

13 June 2023

Mr Stephen O'Donoghue
Director Resource Assessment
Department of Planning & Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Via: Planning Portal

Dear Stephen

Re: Albion Park Quarry – Stage 7 (SSD-10369) RFI4 – Relocation of the “Belmont”

I refer to the Department's Request for Information RFI4 dated 5 May 2023 in relation to relocation of the “Belmont” Homestead. The following provides a response to the matters raised.

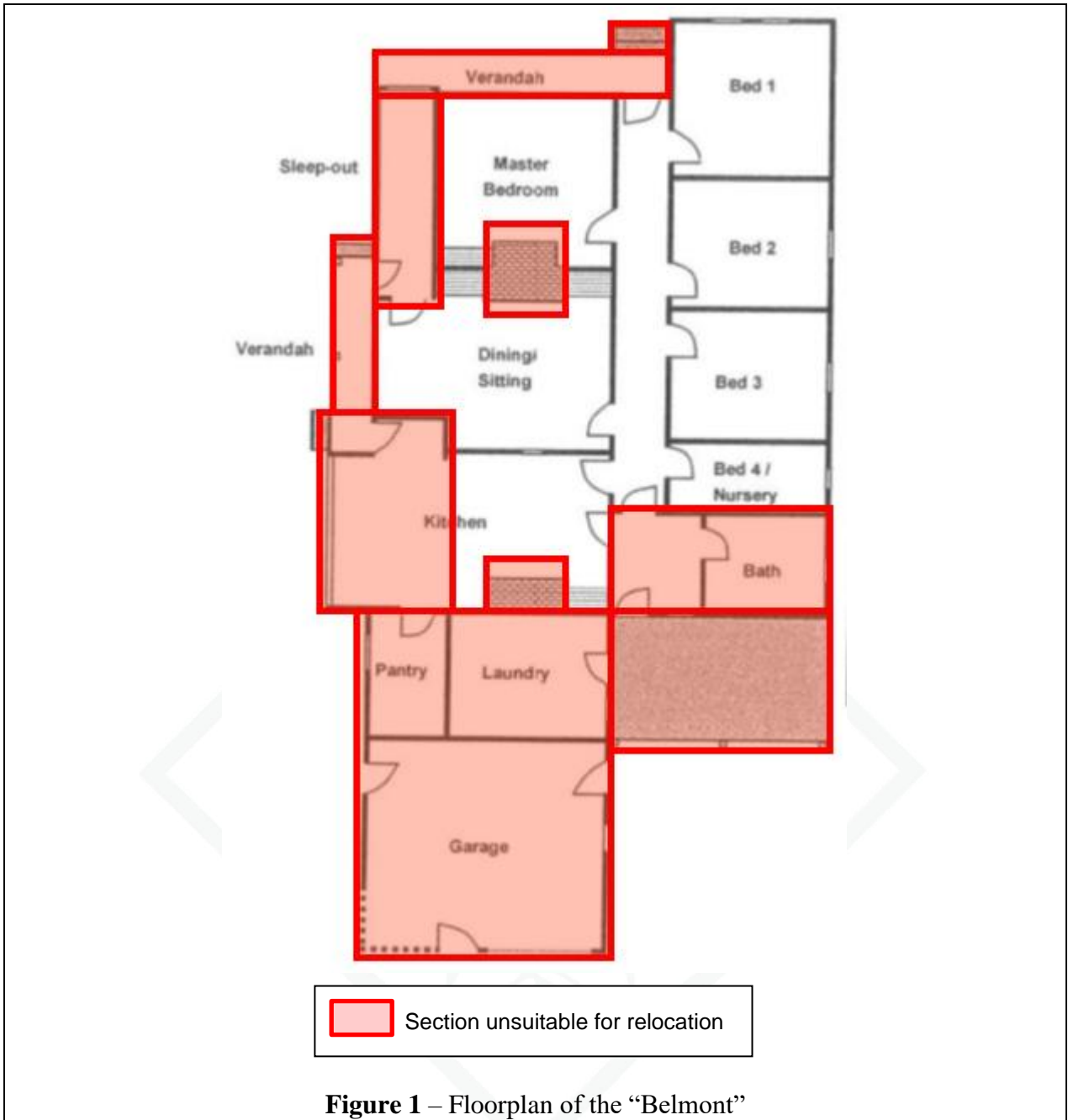
A report from a structural engineer with experience moving heritage buildings;

Assessment of suitable methods of building relocation; and

Response

Clery Bros undertook extensive research to identify a suitable firm to provide advice in relation to the feasibility of relocating heritage listed buildings such as the “Belmont.” Based on that research, only two firms in the greater Sydney area were identified. Both were firms that specialise in relocating residential and other buildings, including experience relocating heritage buildings. Both firms were requested to provide costed proposals to inspect the building and provide report on the feasibility of relocation. One firm, declined to participate. The other firm, McDonald Contracting, inspected the building and potential relocation sites on 1 June 2023. The resulting letter report is presented as **Attachment A**. The principal finding of the report is that the “Belmont” is not suitable for relocation for the following reasons.

- Significant components of the building would not be able to be relocated, including the fireplaces, chimneys, numerous concrete floors and other brickwork. Those areas that could not be relocated are highlighted red in **Figure 1**.
- Existing horsehair plaster would likely fail during transport and would need to be replaced.
- High pitched gables and damaged ceiling areas would require extensive bracing during relocation.
- The structure is either situated on ground or with only a minor elevation above the ground, such that substantial excavation works would be required to enable the installation of steel beams under the structure for transportation.
- The size, shape, and location of the structure do not allow it to be transported in one piece. As a result, the building would be required to be cut into multiple sections for transportation.



In light of the above, McDonald Contracting, as specialists in building relocation, indicated that in their opinion, the “Belmont” is not suitable for relocation and that they would not submit a quote to undertake the works.

A review of the engineering report by a suitably qualified heritage consultant;

Response

Given that McDonald Contracting determined that the “Belmont” was unsuitable for relocation, Cleary Bros determined that there was limited utility in having the report reviewed by a heritage consultant. Notwithstanding this, Cleary Bros note that even if the building could be relocated, the following would result in a substantial reduction in the heritage value of the structure.

- The building would no longer be in its original context.
- Substantial and iconic sections of the building, including the fireplaces, chimneys, concrete slabs and brick walls, would be lost or would require reconstruction, with the associated loss of heritage value.
- Internal features would be damaged or destroyed, including likely destruction of the original plaster.

As a result, Cleary Bros contend that there would be limited benefit in relocation, even if it were feasible to do so.

Identification of potential relocation sites in consultation with nearby neighbours and Shellharbour Council, including outline of any planning approvals that would be required as part of relocation options;

Response

Cleary Bros contacted the following seeking expressions of interest in taking ownership of the “Belmont” structure which would be relocated at Cleary Bros expense.

- Shellharbour City Council
- The owners of “Figtree Hill” (Property 8), “St Ives” (Property 9), “Rosemont” (Property 11), “Kurrawong (Property 13) and “Bravella” (Property 14), each of which have heritage listings under the Shellharbour Local Environmental Plan (LEP).

Shellharbour City Council advised that no Council-owned land is available, and that Council would be unlikely to accept liability for the “Belmont”.

Cleary Bros received an expression of interest from one of the above two landowners, as well as an unsolicited expression of interest from another landholder. In one case the land is zoned RU1 - Primary Production and in the other, RU2 - Rural Landscape. In both cases, the relevant minimum Lot size under the Shellharbour LEP is 40ha. The respective property holdings are 89ha and 35ha, with the first property having two existing residences and the second having one existing residence. As a result, the Shellharbour LEP does not permit any further dwellings to be constructed on either Lot.

Notwithstanding, the landowners of both prospective properties advised that their expression of interest was contingent on their ability to use the “Belmont” as farm stay accommodation. Recent changes to the *State Environmental Planning Policy (Exempt and Complying Development Codes) 2008* provide pathways for the use of new or existing dwellings as Farm Stay Accommodation on land zoned as rural. However, the dimensions of the “Belmont” do not conform with the complying development requirements for Farm Stay Accommodation under the SEPP, and as such this approval pathway would not be available.

Finally, Section 5.10(10) of the Shellharbour LEP provides an avenue where Council as the consent authority may grant consent for proposed development where it would not normally be allowed by the Plan, provided the Council is satisfied that the proposed development:

- a) facilitates the conservation of the heritage item; and
- b) is in accordance with an approved heritage management document; and
- c) all works identified in the heritage management document are carried out, and
- d) the heritage significance of the item, including its setting, is not adversely impacted, and
- e) there would not be any significant adverse effect on the amenity of the surrounding area.

Cleary Bros note that there is no approved heritage management document in place and that the heritage significance of the “Belmont” would be substantially impacted by any relocation.

As a result, even if it were feasible to do relocate the “Belmont,” it is not clear that it would be permissible to erect the building on the identified Lots for use as farm stay accommodation or a residence.

Assessment of the costs and benefits of relocating the homestead including heritage and social values.

Response

The following presents an assessment of the costs and benefits of relocating the “Belmont” together with those aspects that would remain unchanged irrespective of whether the “Belmont” is removed or relocated.

Costs:

- Loss of heritage value of the “Belmont” as a result of the loss of:
 - the landscape heritage setting of the building ;
 - key components of the original structure, including fireplaces, chimneys, floors, plaster and internal fittings, which would change the external and internal character of the building;
 - reconstruction of the relocated structure to a functional condition would require substantial works which would inevitably detract from the original character of the building; and
- Development Consent may not be approved for use of the “Belmont” on the destination property, particularly given the loss of intrinsic heritage value as part of the relocation.

Benefits:

- Sections of the “Belmont” would be retained and would provide some sense of the previous heritage value of the building.

Aspects unchanged irrespective of relocation:

- An interactive three-dimensional virtual model of the “Belmont” and surrounds will be developed, to capture and share the site with the community into perpetuity. This will be provided to the Shellharbour Museum and ensure that the community are able to experience and explore the “Belmont” as part of the *Wentworth Hills and Dunmore Valley Dairy Farming Landscape*.
- An archaeologist will be involved in the removal process, with works guided by an Archaeological Research Design which would follow the intent of the *Heritage Act 1977*. The resulting report would add to the knowledge of past farming practices in the surrounding areas and would be available to future generations.

Proposed Way Forward

As the specialist house removalists McDonald Contracting have identified that the “Belmont” is not suitable for relocation, Cleary Bros reiterate its previous commitment to undertake the following steps to digitally capture the heritage value of the “Belmont” in its current setting, and recover items of interest to the community.

1. Cleary Bros will develop an interactive three-dimensional virtual model of the “Belmont” and surrounds, to capture and share the site with the community into perpetuity. The model would include an interactive walkthrough of the internal and external features of the “Belmont” Main house, as well as an animated re-creation of the locality as it would have appeared in the first half of the 20th century. The model would be shared with Council and made available for inclusion in the Shellharbour Museum, ensuring access to the wider community.
2. Cleary Bros would invite community members to express their interest in recovering materials or items of interest from the “Belmont” as part of its deconstruction. This would allow community members to retain physical artefacts from the “Belmont” and allow it to live on throughout the community.
3. Demolition works would be overseen by a suitably qualified heritage consultant guided by an Archaeological Research Design, such that any residual heritage value would be captured as part of the demolition.

These works would be undertaken as outlined as Action Items 1, 3, and 4 of Appendix 6 of the Amendment Report.

Yours sincerely



Mitchell Bland
Managing Director/Principal

Encls: Attachment A – Letter Report – Relocation of the “Belmont” (McDonald Contracting, 2023)

Attachment A

Advice in relation to
relocation of the "Belmont"

prepared by

McDonald Contracting

(Total No. of pages including blank pages = 4)

1st June 2023

Cleary Bros

Attention: Mark Hammond

Phone: 0407 061 905

Email: markhammond@clearybros.com.au

Subject: House Move

Our Ref#MCDCON010623-1

Dear Mark

Thanks for allowing us to come to site and view the house currently located at 207 Dunsters Lane Croom.

It is in our opinion that the house we have inspected is not suitable for a relocation, nor will McDonald Contracting Pty Ltd quote on the relocation process of this house, we foresee far too many issues arising from the house being heritage. Please see the details below;

As the house is heritage listed there will be many items and regulations that will need to be complied to. The house will, even though staying within the same parcel of land and not entering main roads, still needs to be cut to be transported.

All fireplaces and chimney's will be demolished, they cannot be transported. McDonald Contracting demolish by way of using machinery and or lump hammer, not by hand. Therefore, if for heritage reasons you required to recycle the brick work from the chimneys and fireplaces you would need to engage a third party to remove these items by hand prior to McDonald Contracting being on site. We do not reconstruct these items at the new location.

There are numerous concrete slabs within the building, kitchen, laundry, pantry, bathroom and the front, side, and back patio areas. These concrete slabs are likely to not transport with the original house and would be removed and demolished on site. We do not reconstruct these items at the new location.

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The kitchen area has a brick wall in it, this would not be transported and would be demolished prior to transporting, we don't replace this at the new end. Brick work cannot be transported at all.

At the rear of the house there are extension areas, add ons, that have been added on later. These would not be transported and demolished from the house.

There is a lot of damaged ceiling areas, the gables are high pitched at 5.5m in height, so to move gables with this height would require extensive bracing to support the structure in transport.

Some of the rooms had an old type of horsehair plaster, this does not transport well and is not guaranteed to transport and may need to be replaced with an alternate type of plaster upon arrival to the new site by others.

The perimeter of the building is on the ground therefore extensive cosmetic excavation would be required for around the perimeter to allow us to install the steel carry beams that the house would sit on to transport it. We would recommend using a third party for this work.

An asbestos report would be required as there are notes that the header beam in the kitchen area may contain asbestos related materials, this would be required regardless prior to us arriving on site and is a requirement for any building being relocated regardless of age.

For both routes, we require access width of 7.0m wide for where the building would have to be cut, however with both routes there are particular notes;

Route to the South; would require extensive grading and tree trimming to the width of 7.0m as a minimum, however we are of the understanding that many of the trees and vegetation are not allowed to be touched. Which will impend the house being able to be moved down this path. There are also areas along this path that requires the top of some ridges to have excavation works to make them flatter for the access of the long load.

Route to the North; the route itself is OK, however the noted site where the house would go is on a significant hill and would require excavation works to get the truck on the site with the load etc. Path and pad to be installed.

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If you required any further clarification on the abovementioned letter, please advise and I will attend to this for you asap.

Kind regards

Chantel McDonald

Chantel McDonald
Administrations

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