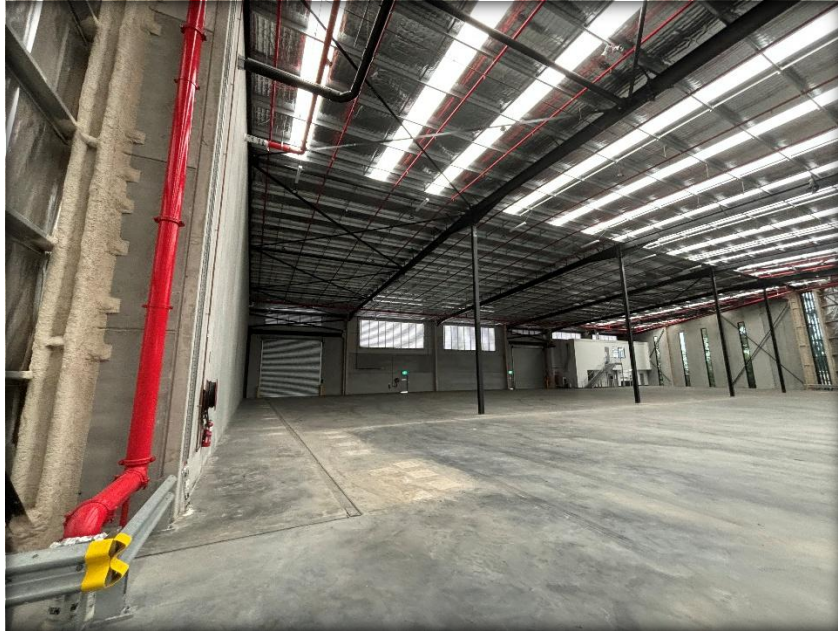


STATEMENT OF HERITAGE IMPACT

**Proposed Fit-out Works at
Warehouse Unit 10, 4-8 Inman Road
CROMER**



Job No. 10556
June 2025

Heritage 21
CULTURAL BUILT HERITAGE IN THE 21ST CENTURY

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CONSERVATION ARCHITECTS AND HERITAGE CONSULTANTS
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Heritage Impact Statements

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Schedules of Conservation Work

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Acknowledgement of Country

Heritage 21 wishes to acknowledge the Traditional Owners of Country throughout Australia and recognise their continuing connection to land, waters and community. We pay our respects to them and their cultures and to Elders both past and present.

Name of the heritage item:

Roche Building

LEP heritage schedule item number and name:

I52 – Warringah Local Environmental Plan 2011

Address and location:

100 South Creek Road, Cromer

Statement of heritage impact for:

Proposed fit-out works for an indoor pickleball arena

Prepared by:

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Prepared for:

BDAI Architects

Cover image: Subject site at Warehouse Unit 10, 4-8 Inman Road, internal view from north-west corner of warehouse.
(Source: Heritage 21, 02 April 2025)

The following table forms part of the quality management control undertaken by Heritage 21 regarding the monitoring of its intellectual property as issued.

Issue	Description	Date	Written by	Reviewed by	Issued by
1	Draft report (D1) issued for comment.	03.06.2025	VK	DJ	VK
2	Draft report (D2) issued for comment.	05.06.2025	VK	DJ	VK
3	Report Issued (RI)	10.06.2025	VK		SR

1.0 INTRODUCTION

1.1 Background

This Statement of Heritage Impact (“SOHI” or “report”) has been prepared on behalf of BDAI Architects who have been engaged by the owner of the site to submit a Development Application for proposed fit-out works at the site.

1.2 Site Identification

The subject site is located at Warehouse Unit 10, 4-8 Inman Road, Cromer, which falls within the boundaries of the Northern Beaches Local Government Area (LGA), and it comprises Lot 1 DP 1282038. As depicted in Figure 1, 4-8 Inman Road is located in between Orlando and South Creek Road, occupying the corner of Inman and South Creek Roads. Unit 10 is part of the complex *Northern Beaches Business Park*, located in its south-western corner (Figure 2). Northern Beaches Business Park is an industrial and office complex comprising of ten units/warehouses and two office buildings. The setting and topography of the site will be more fully described in Section 3.0 below.



Figure 1. Aerial view of 4-8 Inman Road, which is highlighted in yellow and outlined in blue (Source: NSW Spatial Services, “STD Explorer,” accessed 2 April 2025, <https://portal.spatial.nsw.gov.au/explorer/index.html>).

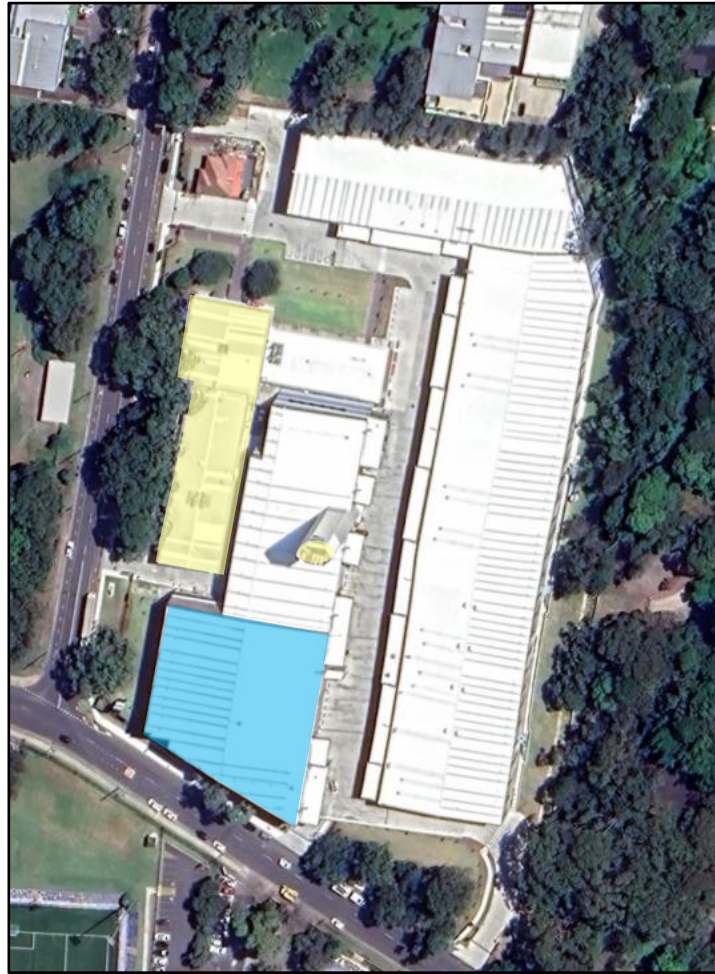


Figure 2. Aerial view of 4-8 Inman Road with proposed work area (Warehouse Unit 10) shaded blue and heritage items shaded yellow (Source: Google, "Google Earth," accessed 02 April 2025, <https://www.google.com.au/earth/>, annotations by Heritage 21).

1.3 Heritage Context

1.3.1 Heritage Listings

The subject site **is listed** as an item of environmental heritage under Schedule 5 of the Warringah Local Environmental Plan 2011 ("WLEP"). It **is not listed** on the NSW State Heritage Register, the National Heritage List, the Commonwealth Heritage List, the National Trust Register (NSW), or the former Register of the National Estate.¹

Statutory List – Legislative Requirements				
List	Item Name	Address	Significance	Item No.
Warringah Local Environmental Plan 2011	Roche Building	100 South Creek Road, Cromer	Local	152

¹ The Register of the National Estate ceased as a statutory heritage list in 2007, but it continues to exist as an inventory of Australian heritage places.

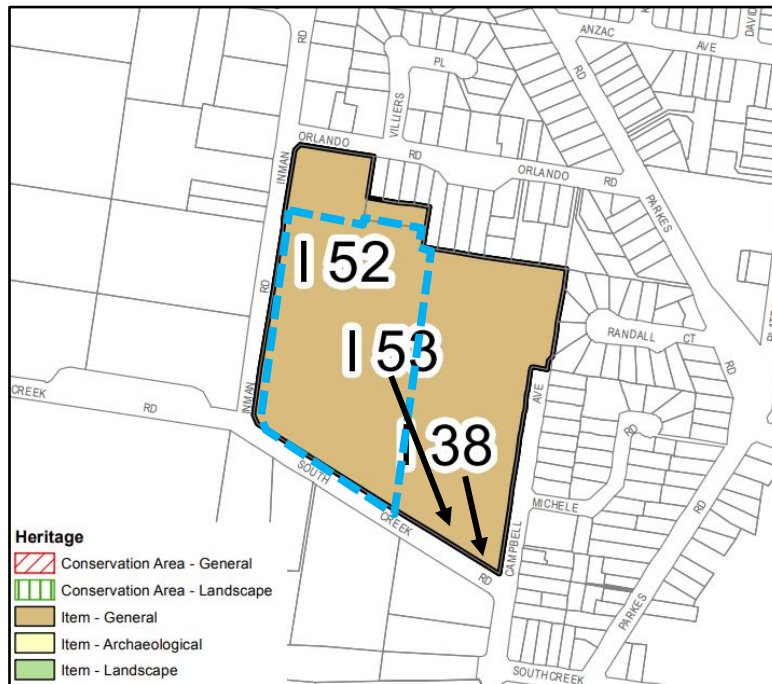


Figure 3. Detail from Heritage Map HER_0029. Approximate location of 4-8 Inman Road is outlined in blue, with heritage items shaded brown. Location of Items I53 and I38 indicated by corresponding black arrow (Source: NSW Legislation Online, <https://www.legislation.nsw.gov.au/maps>, annotated by Heritage 21).

The subject site is **not located** within the boundaries of a Heritage Conservation Area under the WLEP 2011.

1.3.2 Heritage Items in the Vicinity

As depicted in Figure 3 above, the subject site is situated within the general vicinity of the following heritage items listed under Schedule 5 of the WLEP 2011. Details of the listings follow:

Item Name	Address	Significance	Item Number
Givaudan-Roure office	96 South Creek Road	Local	I53
Trees	Campbell Avenue (Eastern part of Roche site)	Local	I38

The proposed development of the site is not located within the visual catchment of heritage items Item I53 and Item I38 nor is it considered to be sufficiently proximate to those places to warrant discussion in the Heritage Impact Assessment contained in Section 6.0 of this SOHI.

1.4 Purpose

The subject site is a heritage item which is listed under Schedule 5 of the WLEP 2011. Sections 5.10(4) and 5.10(5) of the WLEP 2011 require Northern Beaches Council to assess the potential heritage impact of non-exempt development, such as the proposed works (refer to Section 5.0), on

the heritage significance of the abovementioned heritage item and, also, to assess the extent (whether negative, neutral or positive) to which the proposal would impact the heritage significance that heritage item. This assessment is carried out in Section 6.0 below.

Accordingly, this SOHI provides the necessary information for Council to make an assessment of the proposal on heritage grounds.

1.5 Methodology

The methodology used in this SOHI is consistent with *Guidelines for preparing a statement of heritage impact* (2023) and *Assessing heritage significance* (2023) published by the NSW Department of Planning and Environment, and has been prepared in accordance with the principles contained in the 2013 edition of *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance*.

1.6 Limitations

- This Statement of Heritage Impact (“SOHI”) is based upon an assessment of the heritage issues only and does not purport to have reviewed or in any way endorsed decisions or proposals of a planning or compliance nature. It is assumed that compliance with non-heritage aspects of Council's planning instruments, the BCA and any issues related to services, contamination, structural integrity, legal matters or any other non-heritage matter is assessed by others.
- This SOHI essentially relies on secondary sources. Primary research has not necessarily been included in this report, other than the general assessment of the physical evidence on site.
- It is beyond the scope of this report to address Aboriginal or Torres Strait Islander peoples' associations with the subject site.
- It is beyond the scope of this report to locate or assess potential or known archaeological sub-surface deposits on the subject site or elsewhere.
- It is beyond the scope of this report to assess items of movable heritage.
- Any specifics regarding views should be assessed by a view expert. Heritage 21 does not consider itself to be a view expert and any comments in this report are opinion based.
- Heritage 21 has only assessed aspects of the subject site that were visually apparent and not blocked or closed or to which access was not given or was barred, obstructed or unsafe on the day of the arranged inspection.

1.7 Copyright

Heritage 21 holds copyright for this report. Any reference to or copying of the report or information contained in it must be referenced and acknowledged, stating the full name and date of the report as well as Heritage 21's authorship.

2.0 HISTORICAL CONTEXT

2.1 Local History

The following history for the subject site has been extracted from the Conservation Management Plan prepared by Heritage 21 dated May 2019:

The Cromer area is within Gayamaygal land. The Gayamaygal were Dharug language speakers and lived in the Manly Cove area. The land and resources appropriation of the Europeans resulted in Aboriginal people becoming quickly disenfranchised from their traditional territories. The smallpox epidemics of 1789 killed many Aboriginal people of the Sydney region, even those who had not yet come into contact with Europeans.

It was noted by early European settlers that shell middens were present on the southern end of Collaroy beach, while large middens were also located at Narrabeen and Dee Why. These were later mined for lime, but their presence indicates that the ocean and the nearby estuaries provided the Gayamaygal people with a rich and stable food source.²

European exploration of the Warringah area began within the first couple of months of the establishment of a settlement at Port Jackson. In April of 1788 Governor Phillip accompanied by a small party of men made the first of four journeys to Broken Bay, which would have taken him through present Dee Why or along the coastal waters adjacent to it. These initial sorties into the area were followed by visits from Captain Hunter, Lieutenant Bradley and Lieutenant Dawes to map the region.

Early land grants in the Dee Why area were made to John Ramsay, William Cossar and James Jenkins. In 1818 Ramsay was granted 410 acres stretching from Long Reef to Narrabeen Lagoon. William Cossar received 500 acres stretching from Collaroy to Dee Why Lagoon in 1819 and James Jenkins was granted 200 acres, stretching from Dee Why Lagoon to Pacific Parade in the 1830's. These three grants comprise the area of land stretching south from Narrabeen Lagoon to Pacific Parade, Dee Why, all of which was eventually acquired by ex-convict James Jenkins.

Land grants in the Warringah area up until 1830s tended to be large areas of 100 acres lots or more along the coast. After this period, large land grants gave way to grants of smaller blocks comprising 50 or 60 acres. This trend towards small rural blocks continued to the end of the 19th century.

During the nineteenth century, the greater part of the Warringah area was sparsely settled. Small coastal communities developed in the valleys between the headlands. The district's economy was predominantly rural. By the end of the century, the district was producing considerable quantities of fruit and vegetables, maize and wheat, cattle, poultry and dairy products as well as timber and salt.

² Artefact, *Heritage Assessment: Roche Site, 4-10 Inman Road, Cromer*, 3 June 2015, 6.

Warringah, in the early decades of the twentieth century, experienced a large number of subdivisions of rural acreage into small residential blocks. These blocks were generally marketed as investments for weekenders and holiday homes. In the early twentieth century, thanks to the legalisation of swimming in the surf and the establishment of a tramline from Manly to Narrabeen, community interest in the area's beaches for picnics, swimming and surfing significantly increased. Despite this increased activity in residential land speculation, much of the district remained rural with market gardens, orchards and poultry farms.

In the post WWII period, the Warringah district experienced a period of rapid non-rural development. Between the years 1947 and 1954, the population in Warringah nearly doubled, rising from 33, 176 to 60,239. By 1971, the population of the district had risen to 156,873. After 1971, the residential rate of growth in the area continued, be it at a decreased rate. A boom in residential construction accompanied the population increase. While there were 9,427 dwellings in the Warringah district in 1947, by 1954 that number had risen to 17, 568. By 1971, the number of dwellings in the district was 52,676. As urbanisation gained momentum, significant amounts of retail and light industrial development occurred.

Dee Why's residential, commercial and industrial development largely reflects what was occurring in the rest of the district. By 1900, 200 acres of land in Dee Why (the original Jenkins grant) was in the possession of the Salvation Army. The charity converted part of the land into an industrial farm that housed a boys' home and a home for men temporarily in need of help. They also constructed a 'home of rest' for Salvation Army officers, a sanatorium for men, a home for girls and a meeting hall, on the property. The old family homestead was turned into a home for aged men. Circa 1906, the Salvation Army subdivided the area between Pacific and Dee Why Parades at around the same time that the Harper Estate was subdivided. The breaking up of these two estates provided the initial impetus behind the area's development in the 20th century.

In addition to being a thriving residential and commercial centre, modern Dee Why is also a centre for industrial development in the Warringah district. Under the Cumberland Planning Scheme of the 1950's, Brookvale was designated as the district's main area for industrial zoning. As a consequence, the Warringah Shire Council, in 1956, rezoned 170 acres in Dee Why West for industrial use (including the subject site).³

Cromer used to be known as 'Dee Why West'. The name Cromer originates from 'Cromer Cottage', which in the late 1800s was located south-west of what is now the sixth tee on Cromer Golf Course. Cromer Cottage was named after the seaside town of Cromer in Norfolk, England.⁴ Warringah Shire Council officially renamed Dee Why West 'Cromer' in 1964.

³ Rappoport Pty Ltd, *Heritage Impact Statement: 4-10 Inman Road, Dee Why*, August 2004, 5-8.

⁴ Judy Childs, "Cromer," *Dictionary of Sydney*, 2008, <https://dictionaryofsydney.org/entry/cromer>; H.F. Hayman, "The Early History of Cromer," transcript from 1977 tapes by Ann Jarman, 1.

2.2 Site Specific History

Table 1 provides a chronological summary of the historical development of the site and the construction of buildings and structures. For a full history of the subject site, refer to the Conservation Management Plan produced by Heritage 21 in May 2019.

Table 1: Chronological history of the development of the site 1789-2018

Date	Event
1890	Land grant to Middleton (Portion 639)
1890	Land grant to Oatway (Portion 629)
1891	Land grant to McRae (Portion 630 & 631)
1892	Land grant to Little (Portion 632)
1914	Land grant to Lyell (Portion 633)
1925-1930	Construction of house, 98 South Creek Road
1930-1943	Creation of tennis court
1949-1961	Construction of cottage, 8 Inman Road
1962	Roche start of acquisition of site (predominantly western half)
1962-1972	Construction of Car Park and Gardener's Shed (by Fibrecell)
1962-1972	Construction of Warehouse located to west of site (by Latipac / Capital Wires)
1963	Roche starts marketing Valium
1963-1964	Construction of heritage listed Roche Building
1968	Cottage converted into office
1969	First batch of effervescent vitamin products manufactured
1972-1974	Construction of Givaudan
1981	Institute of Marine Pharmacology shut down
2006	Construction of previous office building located on proposed works site
2006	New carpark to N of site
2007	Roche manufacturing ceased
2017	Roche undertook remediation program
2018	Site sold to EG Funds Management

In 2006, an office building was constructed on the site of the proposed work area (see Figure 5). In 2022, works were then approved to demolish the building and construct a new warehouse and further alterations and additions to the site for the development of *Northern Beaches Business Park* (Figure 7). Warehouse Units 10 and 11 were constructed during this period, alongside the neighbouring warehouses east of the site (Figure 2). Since 2023, Warehouse Units 1, 2, 7, 8 and 11 have been approved for various developments, mainly comprising of fit-outs for indoor recreational facilities.⁵

⁵ Northern Beaches Council, "4-8 Inman Road CROMER NSW 2099," EService Property Search, accessed 7 April 2025, <https://eservices.northernbeaches.nsw.gov.au/ePlanning/live/Public/XC.Track/SearchProperty.aspx>.



Figure 4. 2005 aerial view of site. Approximate location of site outlined in yellow, location of proposed works outlined in blue (Source: Google, "Google Earth," <https://www.google.com.au/earth/>).



Figure 5. 2006 aerial view of site. Approximate location of site outlined in yellow, location of proposed works outlined in blue (Source: Google, "Google Earth," <https://www.google.com.au/earth/>).



Figure 6. 2007 aerial view of site. Approximate location of site outlined in yellow, location of proposed works outlined in blue (Source: Google, "Google Earth," <https://www.google.com.au/earth/>).



Figure 7. 2022 aerial view of site. Approximate location of site outlined in yellow, location of proposed works outlined in blue. (Source: Google, "Google Earth," <https://www.google.com.au/earth/>).

3.0 PHYSICAL EVIDENCE

3.1 The Setting

The subject site is located at Warehouse Unit 10, 4-8 Inman Road Cromer. 4-8 Inman Road, known as *Northern Beaches Business Park*, is bounded by South Creek Road to the south and Inman Road to the west, forming a prominent corner position.

Land to the south, north and north-west of the site includes industrial buildings, while land to the east and north-east includes low-density residential dwellings. Many of the dwellings are post-war period detached houses on relatively large allotments in landscape settings. Land to the west and south-west includes Inman Park (across Inman Road) and Cromer Park (across South Creek Road). Also to the west is the Northern Beaches Secondary College (Cromer Campus).

Northern Beaches Business Park is a mixed-used industrial complex that comprises of a variety of recreational and community facilities. It consists of 11 warehouses/units and three offices, including the heritage listed Roche Complex.

3.2 Physical Description

Warehouse Unit 10 is part of a contemporary industrial building located on the south-western corner of the subject site (4-11 Inman Road). The building was constructed in 2023 and consists of two warehouses (10 and 11). Unit 10 comprises of a two-level office space and a warehouse that spans 2,600 square metres. The office space is located in the south-east corner of the warehouse.

The office consists of two water closets and a large open space on the Mezzanine, which is cantilevered from the warehouse. An internal staircase leads to the Ground Floor, which comprises further amenities and a kitchen located on the outside of the office space in the warehouse building. There is another staircase that connects the Ground Floor of the warehouse to the Mezzanine of the office. In the warehouse, there are two roller doors located on the eastern wing of the warehouse: one next to the office and the other on the opposite end. The interior of the warehouses consists of poured concrete flooring and concrete slab walls, with two louvred windows located on the eastern arm, four horizontal aluminium-framed windows on the southern arm and one segmented vertical window covering the western arm. The exposed ceiling is supported by four posts lined across the centre of the warehouse. The ceiling and some parts of the internal walls have exposed reflective thermal insulation.

Externally, Unit 10 presents as a contemporary industrial building, with aluminium cladding and a large window segmented by aluminium frames on the cantilever office area, supported by three concrete beams. The warehouse building consists of the same aluminium cladding and large concrete slab walls.

3.3 Condition and Integrity

The building is in excellent condition. As it is a relatively new construction, an integrity assessment in relation to its heritage significance is not warranted.

3.4 Images

The following photographs have been taken by Heritage 21 at the site inspection undertaken on 02 April 2025, unless stated otherwise.



Figure 8. External view of subject site, facing south-west, cantilevered office in view.



Figure 9. External view of subject site, facing north-west. Note Hexagonal Tower to the right.

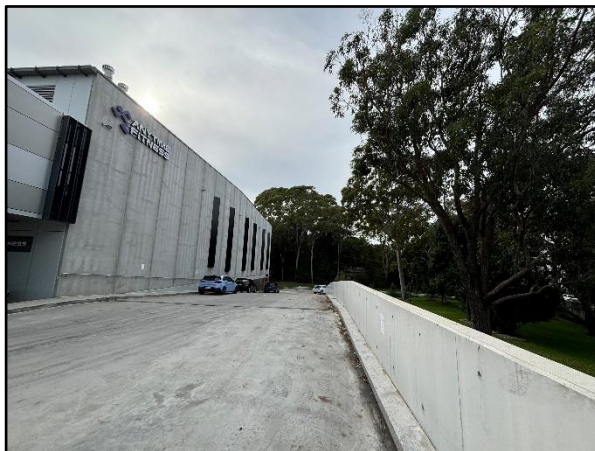


Figure 10. View from front entrance of subject site, facing east, featuring driveway from site to Campbell Road.

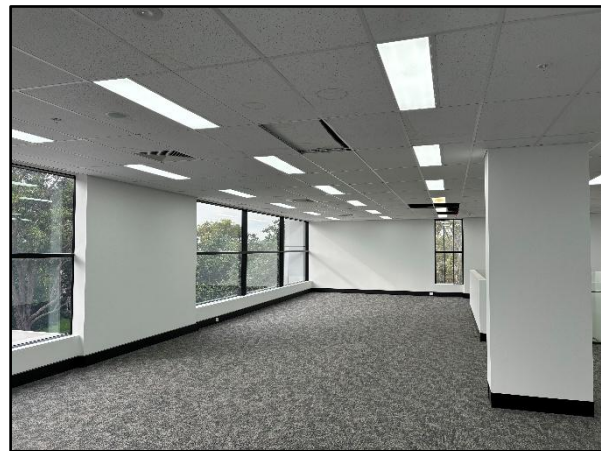


Figure 11. Internal view of Mezzanine office, facing south.

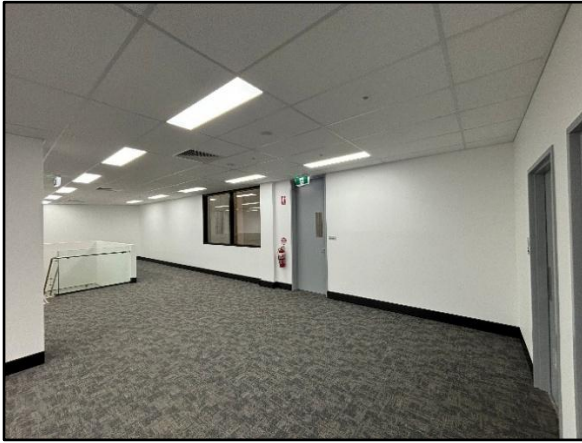


Figure 12. Internal view of Mezzanine office, facing south-west. Internal staircase left of view.

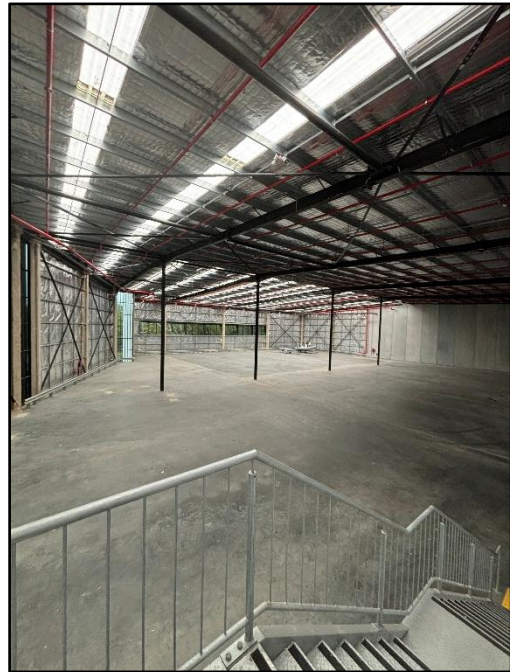


Figure 13. View from Mezzanine towards warehouse, facing west.



Figure 14. Internal view of warehouse, facing north-east towards office area.



Figure 15. Internal view of warehouse from south-east corner, facing east.

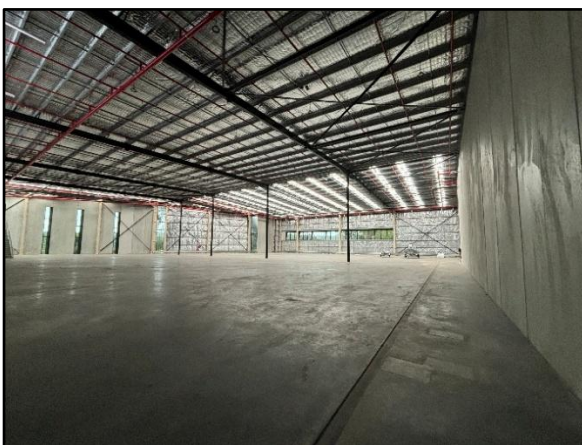


Figure 16. Internal view of warehouse from north-east corner, facing south-east.

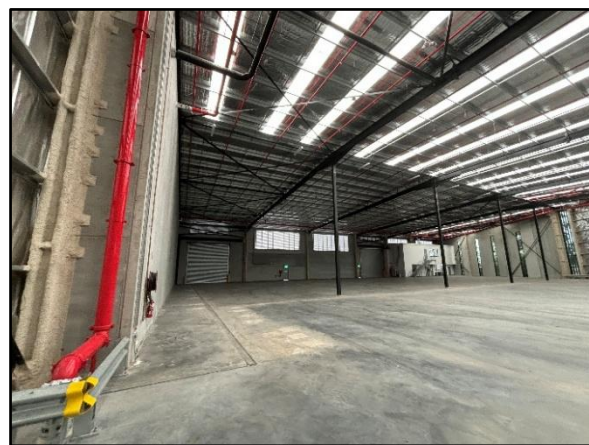


Figure 17. Internal view of warehouse from north-west corner, facing west.

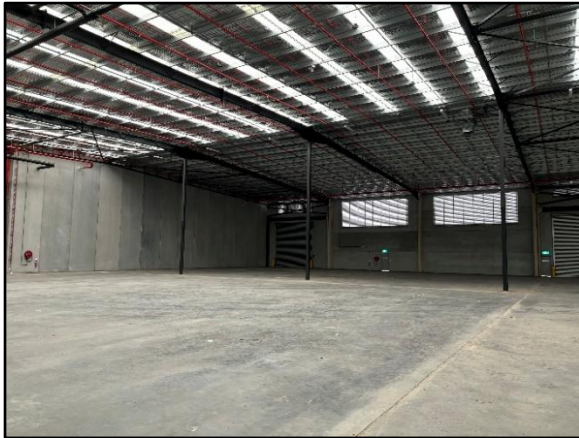


Figure 18. Internal view of warehouse from south-west corner.



Figure 19. Internal view of warehouse from south-west corner, facing north.

4.0 HERITAGE SIGNIFICANCE

In order to assess the impact of the proposed works on the heritage significance of the subject site, it is necessary to first ascertain the heritage significance of these places. Accordingly, Statements of Significance for the heritage item and proposed work area are provided below. The significance of these places will form part of our considerations in the assessment of heritage impact undertaken in Section 6.0 below.

4.1 Established Significance

4.1.1 Roche Building (Item I52)

The following Statement of Significance has been extracted from the State Heritage Inventory:

*A substantial & excellent example of an industrial complex in the late 20th Century international style. Displays high degree of integrity. One of first industrial complexes set in substantial landscaped grounds. Socially significant due to landmark nature.*⁶

The following Statement of Significance has been extracted from the 100 South Creek Road Cromer Conservation Management Plan authored by Heritage 21:

The Roche Complex is a rare and excellent example of an industrial complex in the late twentieth century International Style in a substantial landscaped setting.

It is historically significant reflecting the 1956 industrial rezoning of the Dee Why West area, which combined with the post-war population increase in the area providing a workforce, resulted in the construction of many factories including Roche. The Complex was important in Roche's research, development and distribution of drugs and associated products, with a focus on the pharmacological potential of the Australian marine environment between 1974 and 1981 by Roche's Research Institute of Marine Pharmacology.

The Roche Complex combined with the rest of the buildings within the landscaped setting demonstrate Roche's occupation of the site from 1962 until recently, with an emphasis placed by Roche on the well-being of its workers by providing gardens, trees and recreational areas.

The Roche Complex provides an architecturally and aesthetically significant cluster of buildings, reflecting the talent of its award-winning architects Stafford, Moor and Farrington, who were the architects for the site from 1963 until 1985. These buildings were constructed using a steel framed concrete encased construction method, a technique which is no longer used, providing some degree of research potential. The group of buildings feature strong horizontal and vertical forms, with

⁶ Heritage NSW, "Roche Building," State Heritage Inventory, Heritage Item ID: 2610051.

the two hexagonal towers of Building 7 and the tall glass-walled tower (Building 11) providing landmark quality.

Even though the exterior of most of the Roche Complex is fairly intact, their interiors have been altered extensively by consecutive alterations and refurbishments.⁷

4.1.2 The Proposed Work Area

The proposed works, described below in Section 5.0, are confined to Warehouse Unit 10 of 4-8 Inman Road. The statement of significance for the subject site available on the State Heritage Inventory and the 100 South Creek Road CMP does not mention the particular significance of this element, as it was constructed in 2023. Due to its recent construction, Heritage 21 is of the opinion that the proposed work area is of little heritage significance.

⁷ Heritage 21, Conservation Management Plan, 172.

5.0 WORKS PROPOSED

5.1 Proposal Description

The proposed development would involve fit-out works for an indoor pickleball arena and would include:

- Internal fit-out of warehouse area to accommodate 12 proposed courts.
- Conversion of Mezzanine Office into a Pro shop/café.

5.2 Background

H21 prepared the Conservation Management Plan for the site in April 2019. H21 also prepared a Statement of Heritage Impact for the fit-out works proposed to Warehouse Unit 11, 4-8 Inman Road, Cromer, in 2022.

5.2.1 Considerations of Alternatives

Heritage 21 was not involved in the design process of the proposed development. Notwithstanding, no solutions of greater sympathy with the significance of the subject site are known to us.

5.3 Drawings

Our assessment of the proposal is based on the following drawings by BDAI dated 16 June 2025 and received by Heritage 21 on 04 June 2025. These are reproduced below for reference only; the full set of drawings accompanying the Development Application should be referred to for any details.

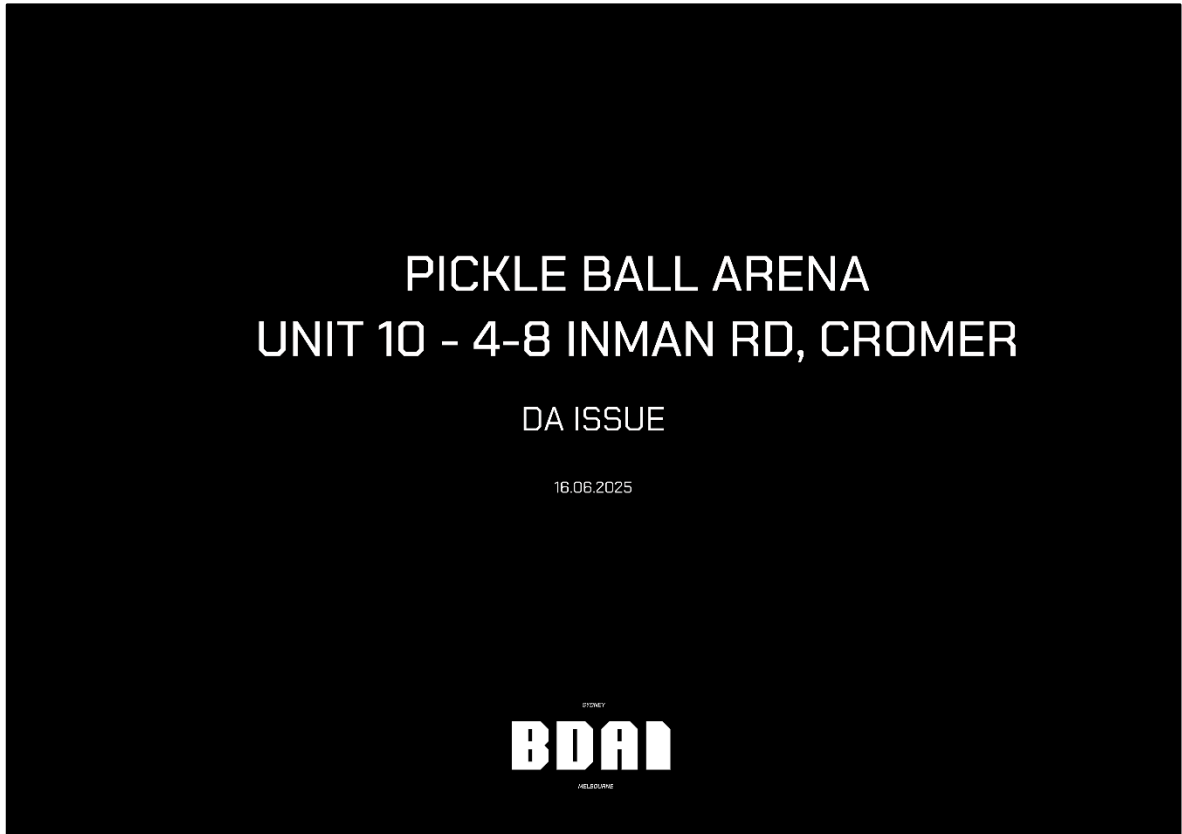


Figure 20. Cover Page

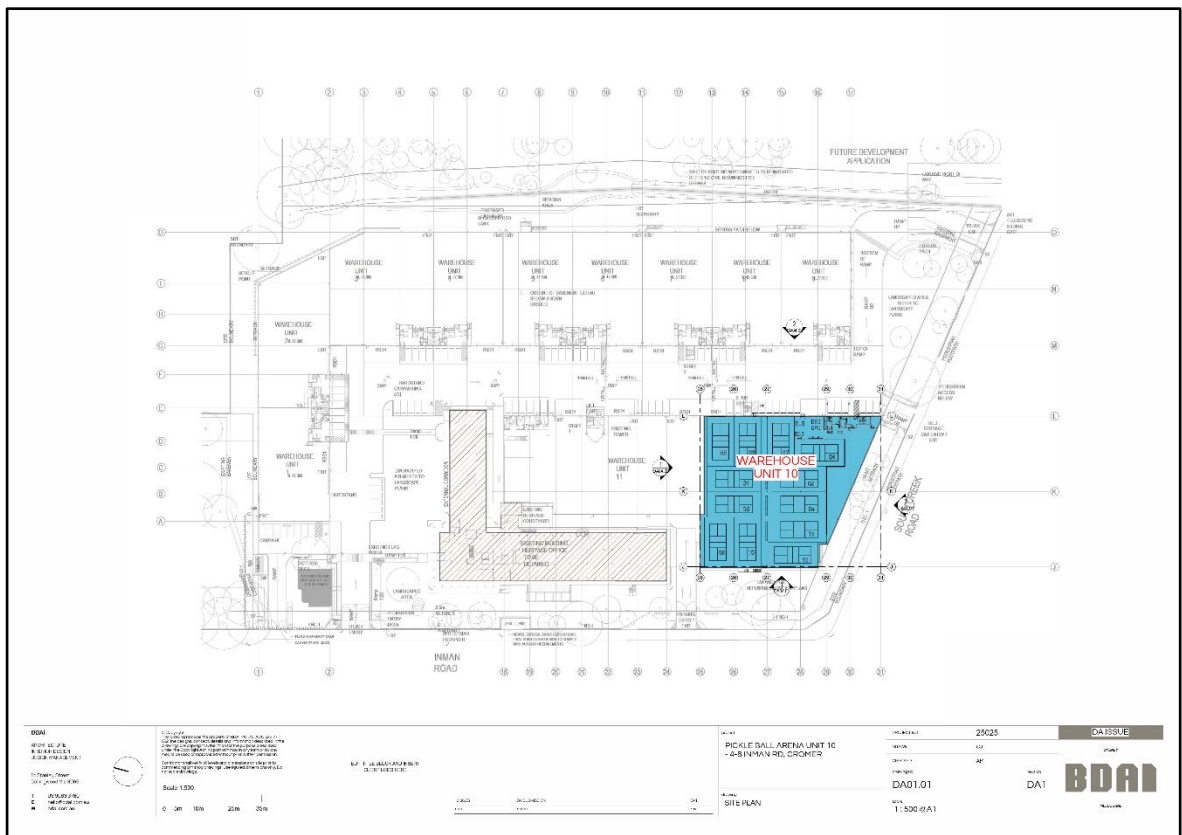


Figure 21. Site Plan



Figure 22. Existing and Demolition Plan – Ground Floor

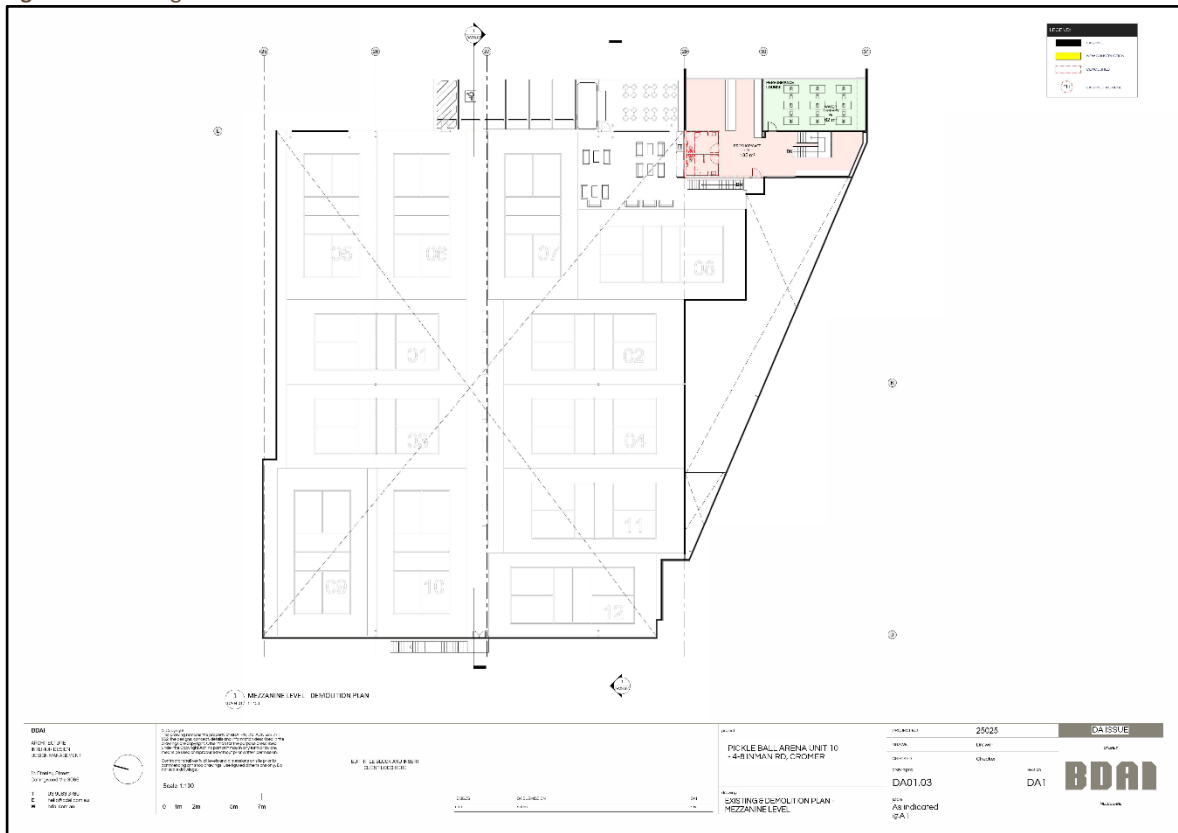
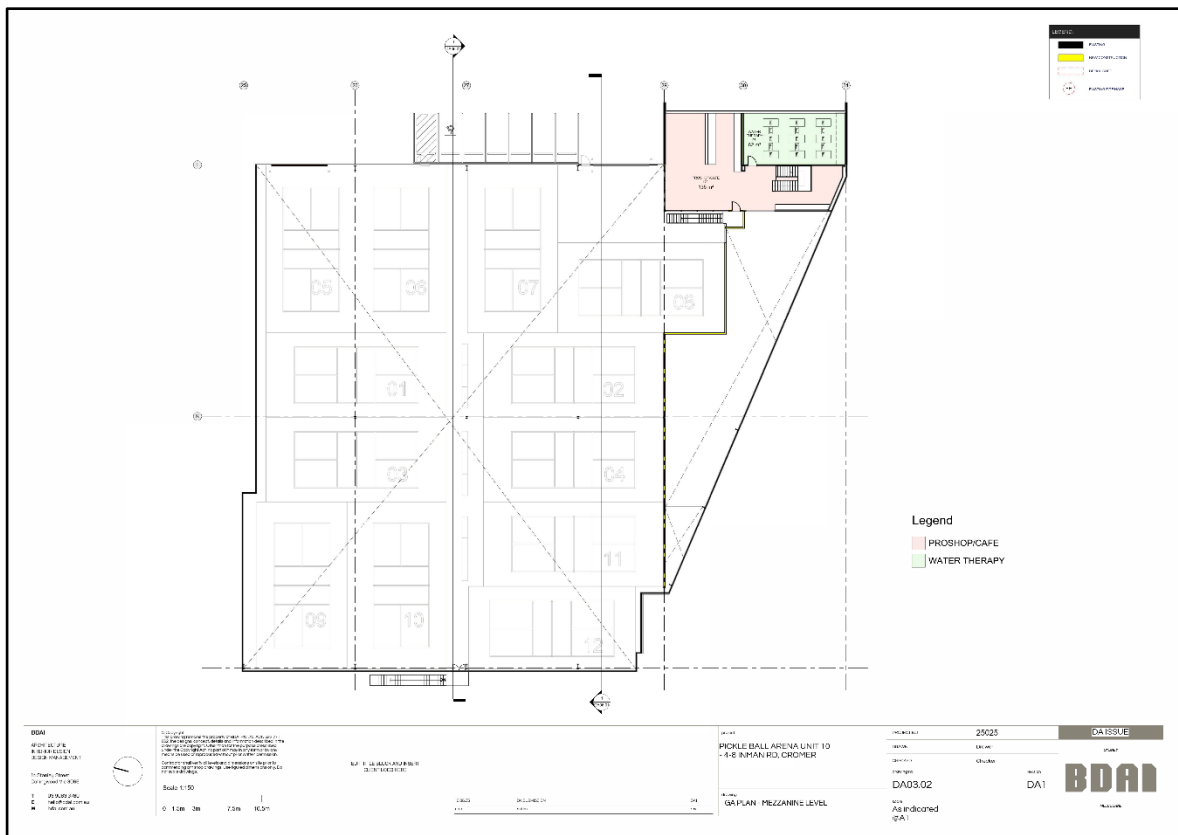


Figure 23. Existing and Demolition Plan – Mezzanine Floor



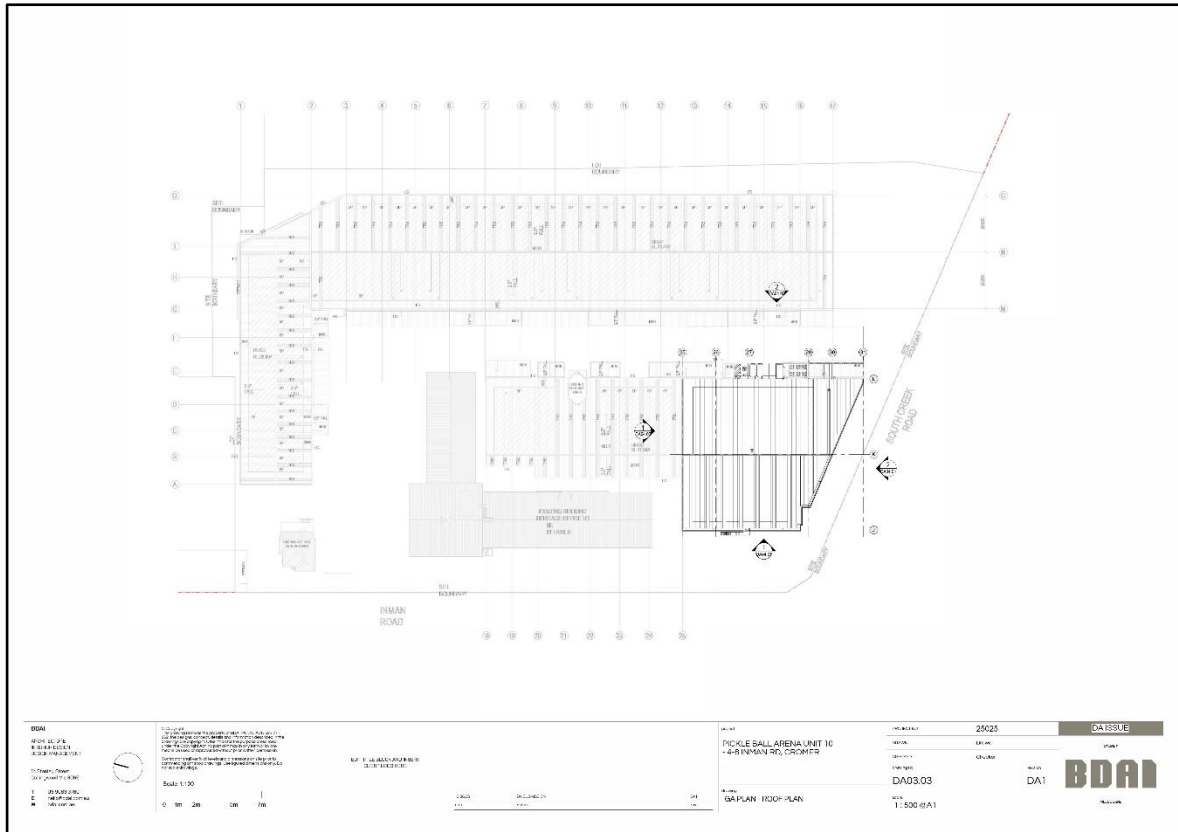


Figure 26. GA Plan - Roof Plan

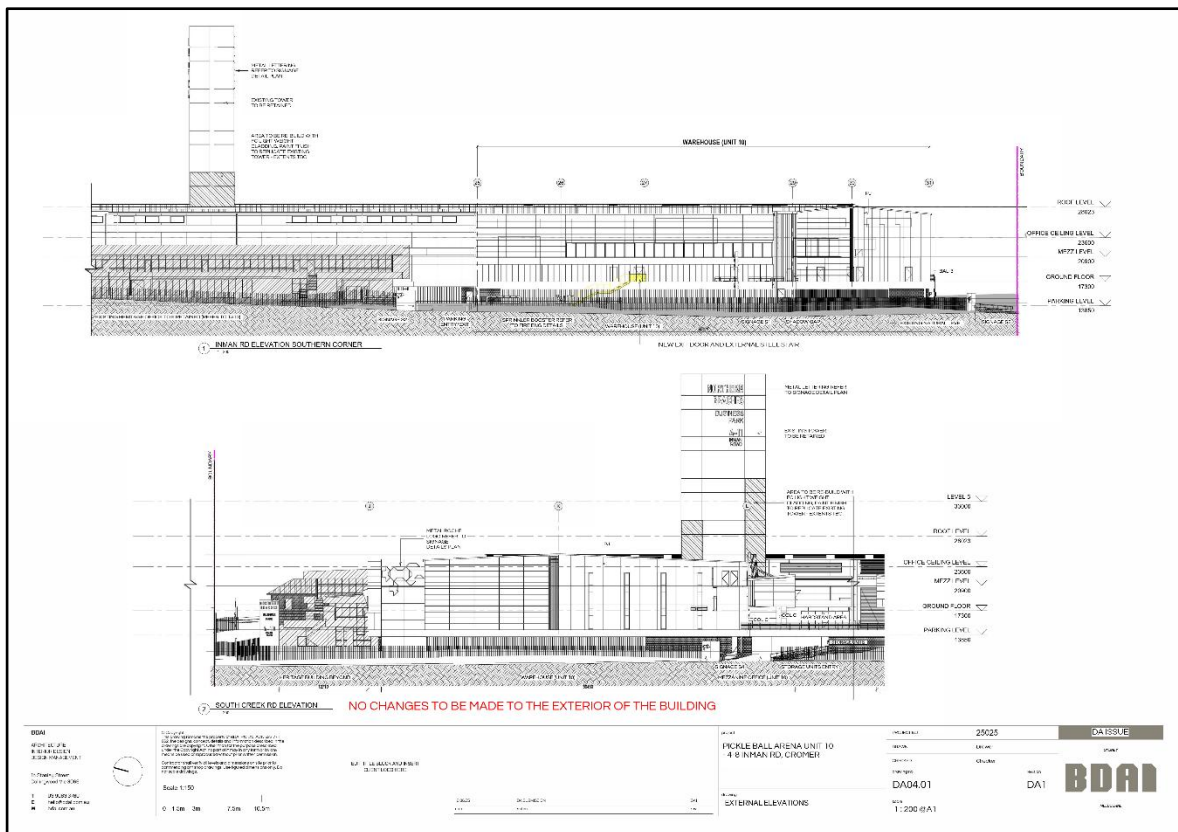


Figure 27. External Elevations

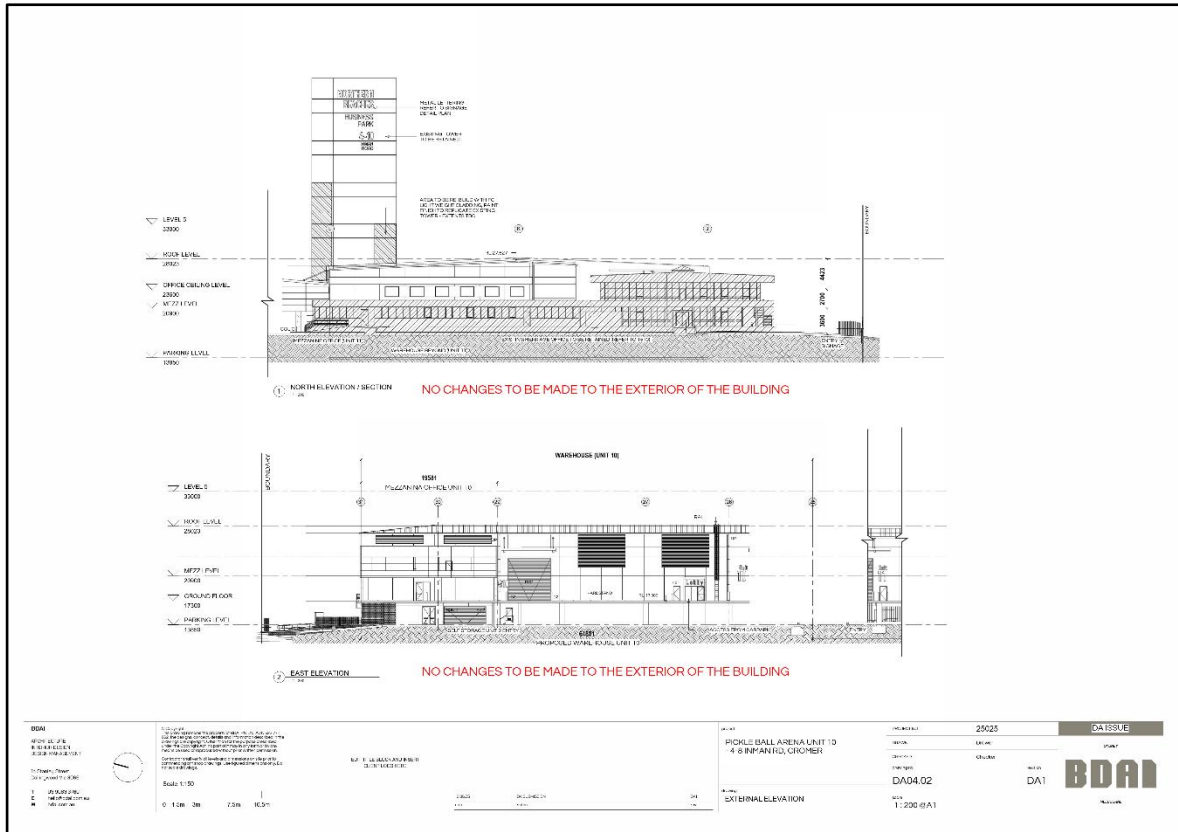


Figure 28. External Elevations

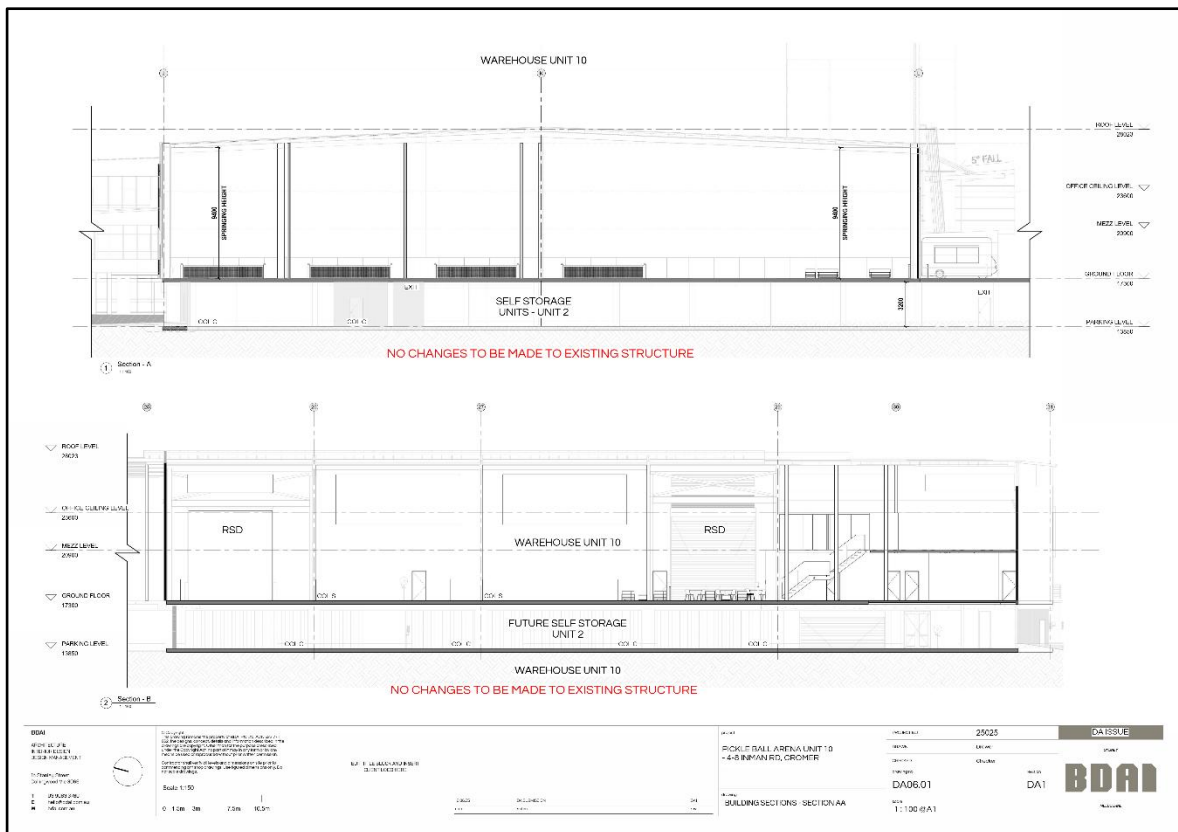


Figure 29. Building Sections – Section AA

6.0 ASSESSMENT OF HERITAGE IMPACT

6.1 Heritage Management Framework

Below we outline the heritage-related statutory and non-statutory constraints applicable to the subject site, including the objectives, controls and considerations which are relevant to the proposed development as described in Section 5.0 above. These constraints and requirements form the basis of this Heritage Impact Assessment.

6.1.1 Warringah Local Environmental Plan 2011

The statutory heritage conservation requirements contained in Section 5.10 of the *Warringah Local Environmental Plan 2011* (“XLEP”) are pertinent to any heritage impact assessment for future development on the subject site. The relevant clauses for the site and proposal are outlined below:

- (1) Objectives
- (2) Requirement for consent
- (4) Effect of proposed development on heritage significance
- (5) Heritage assessment

6.1.2 Warringah Development Control Plan 2011

Our assessment of heritage impact also considers the heritage-related sections of the Warringah Development Control Plan 2011 (“WDCP”) that are pertinent to the subject site and proposed development. These include:

- Part B Built Form Controls*
- Part D Design*

6.1.3 100 South Creek Road, Cromer Conservation Management Plan 2019

Our assessment of heritage impact also considers the relevant sections of the 100 South Creek Road, Cromer Conservation Management Plan (CMP), prepared by Heritage 21 in 2019. These include:

- 9.3 *Managing Change*
- 9.5 *Treatment of Fabric*
- 9.6 *New Structures*
- 9.8 *Views and Setting*

6.1.4 NSW Department of Planning and Environment Guidelines

In its guidelines for the preparation of Statements of Heritage Impact, the NSW Department of Planning and Environment provides a list of considerations in the form of questions aiming at directing and triggering heritage impact assessments. These are divided into sections to match the different types of proposals that may occur on a heritage item, item in a heritage conservation area

or item in the vicinity of heritage. Below are listed the considerations which are most relevant to the proposed development as outlined in Section 5.0 of this report.

Alterations and additions

- *Do the proposed works comply with Article 22 of The Burra Charter, specifically Practice note article 22 — new work (Australia ICOMOS 2013b)?*
- *Are the proposed alterations/additions sympathetic to the heritage item? In what way (e.g. form, proportion, scale, design, materials)?*
- *Will the proposed works impact on the significant fabric, design or layout, significant garden setting, landscape and trees or on the heritage item’s setting or any significant views?*
- *How have the impact of the alterations/additions on the heritage item been minimised?*
- *Are the additions sited on any known or potentially significant archaeological relics? If yes, has specialist advice from archaeologists been sought? How will the impact be avoided or mitigated?*

Change of use

- *Does the existing use contribute to the significance of the heritage item? Why is the change of use proposed?*
- *Will the change of use have an impact on the significance of the heritage item?*
- *Will the change of use require changes to the fabric or significant elements? How does that impact significance of the heritage item?*

Access

- *Will the heritage item be accessed by the public? If so, has the advice of an access consultant been sought to investigate options of Disability Discrimination Act compliant access that may have least impact on the heritage item?⁸*

⁸ Department of Planning and Environment, *Guidelines for preparing a statement of heritage impact* (Paramatta: Department of Planning and Environment, NSW Government, 2023), <https://www.environment.nsw.gov.au/research-and-publications/publications-search/statements-of-heritage-impact>.

6.2 Heritage Impact Assessment

Below we assess the impact that the proposed development would have upon the heritage item. This assessment is based upon the Historical Context (refer to Section 2.0), Physical Evidence (refer to Section 3.0), Heritage Significance (refer to Section 4.0) and the Proposal (refer to Section 5.0), as well as a review of the Heritage Management Framework (refer to Section 6.1) and the impact of the proposal on the relevant heritage item (refer to Sections 1.3).

6.2.1 Summary

The proposed internal fit-out works are located within an existing warehouse space situated adjacent to the listed heritage Roche Factory Building at 4–8 Inman Road, Cromer. The fit-out is designed to accommodate twelve playing courts, a pro shop, and a café, forming a new use for the currently vacant and inactive warehouse. The scope of works would also include installation of an external evacuation staircase on the southwestern façade of the warehouse, as per the BCA requirements. This intervention supports the principles of adaptive reuse by reactivating the space while maintaining the heritage significance of the surrounding context.

The works are non-structural in nature and involve the installation of lightweight, modular elements. These primarily comprise internal partitions, services, and floor finishes, all of which are fully reversible to ensure no permanent alteration or damage to the existing building fabric. Crucially, the fit-out has been designed to avoid any impact on significant heritage fabric and respects the existing building envelope and character. All proposed changes are mostly confined within the internal volume of the warehouse and do not involve any modification to its external form, roofline. The only external addition proposed to the contemporary building fabric would be the metal staircase, which will be sited far from the heritage listed building and due to its simple and recessive design and nature it would have a minimal impact to the subject site and some secondary view lines. As such, there will be no change to the visual prominence or setting of the heritage item within its curtilage, nor will any significant view lines to or from the heritage item be obstructed or altered. The proposal does not affect the scale, massing, or form of the warehouse or the heritage item, thereby preserving its relationship with the surrounding built environment.

Accordingly, no adverse impact is anticipated on the significance, interpretation, or appreciation of the Roche Factory Building as a result of the proposed works. In summary, the fit-out has been carefully designed to respect the site's heritage values. It meets functional requirements for its intended use while preserving the visual, spatial, and material integrity of the adjacent heritage item. In our view, the proposed works would have a negligible heritage impact and would be consistent with established conservation objectives.

6.2.2 Impact Assessment Against the WLEP 2011

The statutory heritage conservation requirements contained in Section 5.10 of the *Warringah LEP 2010* are pertinent to any heritage impact assessment for future development on the subject site. We assess the proposal against the relevant clauses below.

CLAUSE	ASSESSMENT
(1) Objectives	Unit 10, 4–8 Inman Road, Cromer—the subject building—is a contemporary structure located within the curtilage of a heritage item listed under Schedule 5 of the Warringah Local Environmental Plan (WLEP) 2011. The proposed internal fit-out works to a tenancy located within a 2023 warehouse unit would not result in any negative impacts on the heritage significance of the heritage-listed site. It is noted that all proposed works are confined to the interior and would not affect the existing scale, massing, or visual bulk of the contemporary structure. Furthermore, the proposed materials, finishes, and overall configuration of the new elements have been designed to respond to the building’s existing contemporary character and subdued aesthetic. As such, they are considered to be sympathetic to the heritage context in which the building is situated.
(2) Requirement for consent	This Development Application is lodged to Northern Beaches Council to gain consent for the works proposed in the vicinity of heritage items listed under Schedule 5 of the Warringah LEP 2011.
(4) Effect of proposed development on heritage significance	This Statement of Heritage Impact accompanies the Development Application in order to enable the Northern Beaches Council, as the consent authority, to ascertain the extent to which the proposal would affect the heritage significance of the heritage item.
(5) Heritage assessment	

6.2.3 Impact Assessment Against the WDCP 2011

The proposed development involves an internal fit-out of a contemporary building (Warehouse Unit 10) and installation of a metal staircase to the south western façade of the building located within the subject site. The works would not entail the modification or removal of any heritage-significant fabric, given the physical separation between the proposed works and identified areas of heritage significance. The proposed internal fit-out and minor external works would have a minimal impact on the Warehouse Unit 10. These works would not have any impact to nearby heritage-significant structures. All proposed works are confined to the contemporary building fabric of Warehouse Unit 10 and relate mostly to the internal areas which have limited or no heritage significance. The proposal does not include any external additions that would alter the form, bulk, or scale of adjacent heritage buildings.

Accordingly, Heritage 21 is of the opinion that the proposed works to accommodate an indoor pickleball arena and associated works would not have a detrimental impact on the heritage significance of the site, or on any identified heritage-significant structures in the vicinity of the subject building, including their contributory fabric or broader setting.

6.2.4 Impact Assessment Against the 100 South Creek Road, Cromer Conservation Management Plan 2019

Conservation Policies	
9.3 Managing Change	
Policy	Assessment
<p>3.3 – Change of Use of the Place <i>If a change of use of the place is proposed, this CMP should be reviewed by experienced heritage professionals. The suitability of the proposed use should be investigated to avoid negative impact upon heritage significance.</i></p>	<p>The proposed works are confined to the internal areas of the contemporary (2023) warehouse structure. As the subject building does not contain any heritage-significant fabric, the proposed works would not have an adverse impact on the heritage significance of the site. The proposed change of use of a warehouse to a pickleball arena is considered appropriate and compatible with the character of the subject building.</p>
9.5 Treatment of Fabric	
<p>5.2 – Proposed Alterations to Fabric of Little Significance <i>Proposed changes to fabric identified in this CMP as being of 'little significance' may take place so long as it does not result in a reduction of the significance constituted in the elements and spaces identified in this report as possessing 'high significance'. Demolition of such spaces or elements is generally permissible where appropriate. Any new work proposed to such spaces identified as possessing little significance should, wherever possible, be sympathetic to the original fabric and spaces.</i></p>	<p>The works proposed as part of this development would be limited to later addition fabric of minimal significance, thereby ensuring that they do not detract from the heritage significance of the overall subject site.</p>
9.8 Views and Setting	
<p>8.1 – External Views <i>Views to the significant buildings from the surrounding streets should be maintained, and enhanced where possible, by the careful management of the design of any new structures and plantings.</i></p>	<p>The proposed works are confined to the internal areas of Unit 10 and would not alter the scale, bulk, or form of the structure. As such, the fit-out would not result in any change to, or impact upon, external views to or from the subject site.</p>
<p>8.2 Internal Views <i>Views of the significant buildings from within the site should be maintained, and enhanced where possible, by the careful management of the design of any new structures and plantings.</i></p>	<p>The works would be confined to the internal areas of Unit 10 and would not alter the external appearance of the building. Accordingly, all internal views and vistas within the site would be maintained and preserved.</p>

6.2.5 Impact Assessment Against the NSW Department of Planning and Environment Guidelines

As acknowledged in Section 6.1.4, the NSW Department of Planning and Environment has identified a list of considerations in the form of questions aimed at directing and triggering heritage impact assessments. Below, we assess the proposal against the most pertinent of these questions.

Question	Assessment
Alterations and additions	
<i>Do the proposed works comply with Article 22 of The Burra Charter, specifically Practice note article 22 — new work (Australia ICOMOS 2013b)?</i>	The proposed works are limited to the interiors of a contemporary warehouse building added to the heritage-listed site in 2023, thereby limiting the new works to an area of little significance. The proposed works would not alter the exteriors of the subject warehouse and would maintain the existing setting and views of the heritage item. As such, the proposal is assessed to be in accordance with the principles of The Burra Charter.
<i>Are the proposed alterations/additions sympathetic to the heritage item? In what way (e.g. form, proportion, scale, design, materials)?</i>	The proposed additions would be sympathetic to the subject building through the use of appropriate lightweight materials and finishes. The works are located entirely within the internal areas of a recently constructed building and seek to reconfigure the internal spaces to accommodate contemporary user requirements. As the proposal is limited to interior alterations of a c.2023 building, it would respect the heritage significance of the site and ensure that the setting and views to the heritage item would be preserved.
<i>Will the proposed works impact on the significant fabric, design or layout, significant garden setting, landscape and trees or on the heritage item's setting or any significant views?</i>	The works would be confined to the internal spaces of the warehouse building and would neither impact the streetscape nor obstruct any views from Inman Road. Furthermore, the proposed modifications would not alter the bulk or scale of the site. The finishes and materials, combining modern and muted tones, would serve to highlight significant features.
<i>How have the impact of the alterations/additions on the heritage item been minimised?</i>	The scope of the proposed works is confined to the internal spaces of the site, specifically within contemporary fabric situated at a sufficient distance from the significant heritage fabric within the subject site. Therefore, the proposed works would have a neutral impact on the site. No alterations to highly significant fabric are included in the scope of work, ensuring that the heritage significance and integrity of the building fabric remain intact.
<i>Are the additions sited on any known or potentially significant archaeological relics? If yes, has specialist advice from archaeologists been sought? How will the impact be avoided or mitigated?</i>	An assessment of archaeological potential is outside the remit of this report. In saying so, the works would be limited to internal fit-out works and would not include any subsurface excavation at the subject site.
Change of use	
<i>Does the existing use contribute to the significance of the heritage item? Why is the change of use proposed?</i>	The CMP prepared by Heritage 21 in 2019 suggests that the change of use is supported and, since the works are limited to the interior of a c.2023 building, these works would not have any negative impacts. Moreover, Unit 10 is currently unused. Consequently, its transformation into an event space would make a positive contribution to the heritage significance of the subject site.

Question	Assessment
<i>Will the change of use have an impact on the significance of the heritage item?</i>	The proposed works are confined to the internal areas of a contemporary building situated within the curtilage of a heritage-listed item. As these works relate to a portion of the subject site that has previously been altered, they would not impact the heritage significance of either the listed item or the broader subject site.
<i>Will the change of use require changes to the fabric or significant elements? How does that impact significance of the heritage item?</i>	The proposed internal fit-out works would be entirely contemporary and reversible, and would be located within previously altered areas of the subject site. Therefore, no impact would be imposed upon any significant fabric or elements of the site.
Access	
<i>Will the heritage item be accessed by the public? If so, has the advice of an access consultant been sought to investigate options of Disability Discrimination Act compliant access that may have least impact on the heritage item?</i>	<p>The subject building would be publicly accessible. To ensure universal access, an internal lift and an external metal exit staircase would be installed. However, none of these works would affect the heritage-listed building.</p> <p>In our opinion, the heritage guidelines do not apply to the proposed scope of works.</p>

7.0 CONCLUSION & RECOMMENDATIONS

7.1 Impact Summary

The NSW Department of Planning and Environment's guidelines require the following aspects of the proposal to be summarised.⁹

7.1.1 Aspects of the proposal which respect or enhance heritage significance

In our view, the following aspects of the proposal would respect the heritage significance of the subject building and subject site:

- The proposed works would only involve alterations and modifications to internal spaces of Warehouse Unit 10, which is a building constructed in 2023.
- The proposal would not alter or impact the heritage listed building located within the subject site.
- The proposed works would ensure that the space continues to serve as a commercial space thereby improving public engagement within the heritage-listed site.

7.1.2 Aspects of the proposal which could have a detrimental impact on heritage significance

In our view, there are no aspects of the proposal which could be detrimental to the significance of the subject building, the subject site, or heritage items in the vicinity. The neutral impacts of the proposal have been addressed above in Section 7.1.1.

7.2 General Conclusion

Heritage 21 is confident that the proposed development complies with pertinent heritage controls and would not engender a negative impact on the heritage significance of the subject site. We therefore recommend that Northern Beaches Council view the application favourably on heritage grounds.

⁹ Department of Planning and Environment, *Guidelines for preparing a statement of heritage impact*.

8.0 SOURCES

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