

STATEMENT OF HERITAGE IMPACT

Proposed Development at

4 – 8 Inman Road

Cromer



Job No. 10297

May 2024

Heritage21
CULTURAL BUILT HERITAGE IN THE 21ST CENTURY

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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 and Givaudan-Roure Office

State Heritage Register / LEP heritage schedule item number and name:

I52 and I53

Address and location:

100 South Creek Road, Cromer NSW 2099

96 South Creek Road, Cromer NSW 2099

Statement of heritage impact for:

Fit-out within Unit 5 and Unit 6

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Prepared for:

TMX Transform

Cover image: Subject site at 4 – 8 Inman Road Cromer, looking south-east towards Unit 5 and Unit 6.
(Source: Heritage 21, 15 May 2024)

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.	16.05.2024	NO	PR	MP
2	Final report (R1) issued.	29.05.2024	NO		MP

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1.0 INTRODUCTION

1.1 Background

This Statement of Heritage Impact ("SOHI" or "report") has been prepared on behalf of TMX Transform who have been engaged by the owner of the site to submit a development application for a new development at the site.

1.2 Site Identification

The subject site is located at 4-8 Inman Road, Cromer, also referred to in this report as the "Former Roche Complex," and "the site." As depicted in Figure 1 below, the site is located on the northern side of South Creek Road, its eastern and western boundaries abutting Inman Road and Campbell Avenue. Additionally, it comprises of 3 lots described as Lots 1, 2 and 3 of Deposited Plan (DP) 1282038 which fall within the boundaries of the Northern Beaches Local Government Area.



Figure 1. Aerial view of the site, which is highlighted in yellow. (Source: NSW Spatial Services, "SIX Maps", accessed 15 May 2024, <http://maps.six.nsw.gov.au/>)



Figure 2. Excerpt from Proposed Site Plan, showing the location of Unit 5 and 6 within the proposed development.

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

The details of the listings follow:

Item name	Address	Significance	Item no
Roche Building	100 South Creek Road, Cromer NSW 2099	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.

Givaudan-Roure Office	96 South Creek Road, Cromer NSW 2099	Local	I53
Trees	Campbell Avenue, Cromer NSW 2099	Local	I38

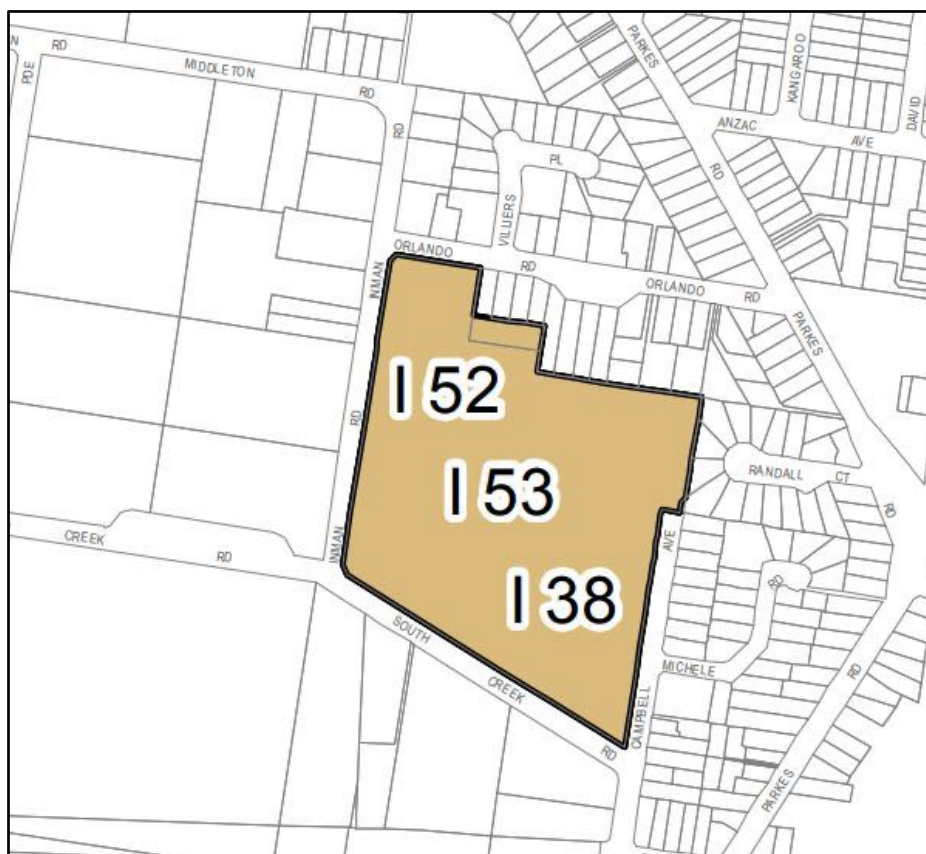


Figure 2. Detail from Heritage Map HER_009. The subject site is outlined in black and heritage items, are marked brown. (Source: NSW Legislation Online, <https://legislation.nsw.gov.au>)

The subject site is **not** located within the boundaries of any heritage conservation area (“HCA”) under the WLEP 2011.

1.3.2 Heritage Conservation Areas (“HCA”)

There are no heritage items or heritage conservation areas that are listed under Schedule 5 of the *Warringah LEP 2011* situated in the vicinity of the subject site.

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 of 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 *Statements of Heritage Impact* (1996) and *Assessing Heritage Significance* (2001) published by the Heritage Division of the NSW Office of Environment and Heritage and has been prepared in accordance with the principles contained in the most recent edition of *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance* (2013).

1.6 Limitations

- This 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 Indigenous 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 Authors

This Statement of Heritage Impact ("SOHI" or "report") has been prepared by Nicole O'Connell and overseen by Paul Rappoport, of Heritage 21.

1.8 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.

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.

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 WW II 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).²

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.³ Warringah Shire Council officially renamed Dee Why West 'Cromer' in 1964.⁴

² Rappoport, Heritage Impact Statement, p5-8.

³ Childs J., Cromer, 2008; Hayman H.F., The Early History of Cromer, p1.

⁴ Heritage 21, Conservation Management Plan – 100 South Creek Road, Cromer (Alexandria: Heritage 21, May 2019).

2.2 Site Specific History

The earliest Parish Map of the area – dating to the early 1800s – shows the early land grants in the surrounding area, including John Ramsay's 410 acres, granted in 1818, and William Cosser's 500 acres, granted in 1819 (refer to Figure 3).

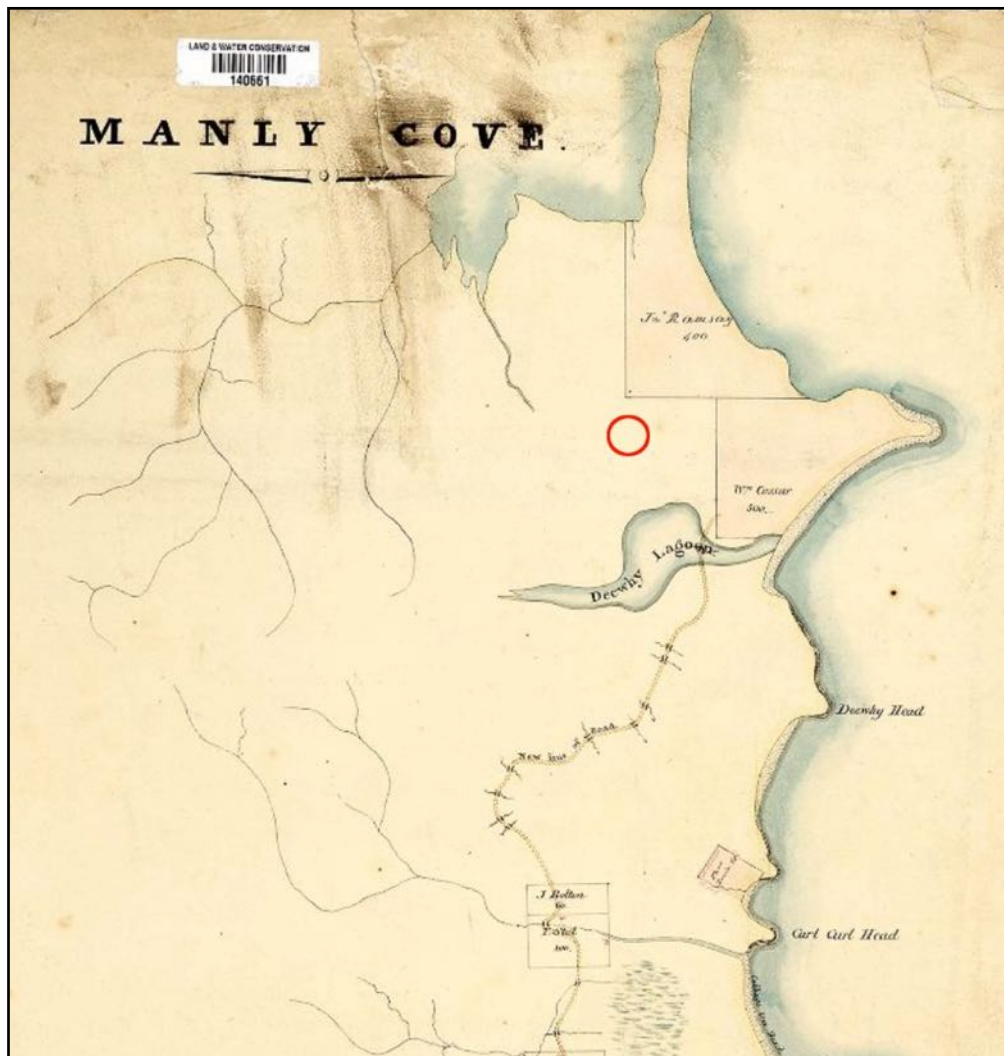


Figure 3. Detail of Parish Map (pre-1830s) of the Manly Cove parish, with the approximate location of the subject site circled. The early land grants are situated to the north of Dee Why lagoon, with two smaller grants near Curl Curl Head. (Source: Manly Cove Regional Charting MapHLRV, Sheet 6)

The land contained within the subject site became part of land grants during the late 1800s and early 1900s. It was part of five different crown grants, as shown in Figure 4 below. In 1890, Portion 639 was granted to Henry Audsley Middleton, while Portion 629 was granted to Charles Oatway. In 1891,

Portions 630 and 631 were granted to Miles McRae. In 1892, Portion 632 was granted to Louisa Little. In 1914, Portion 633 was granted to James Robinson Lyell.⁵

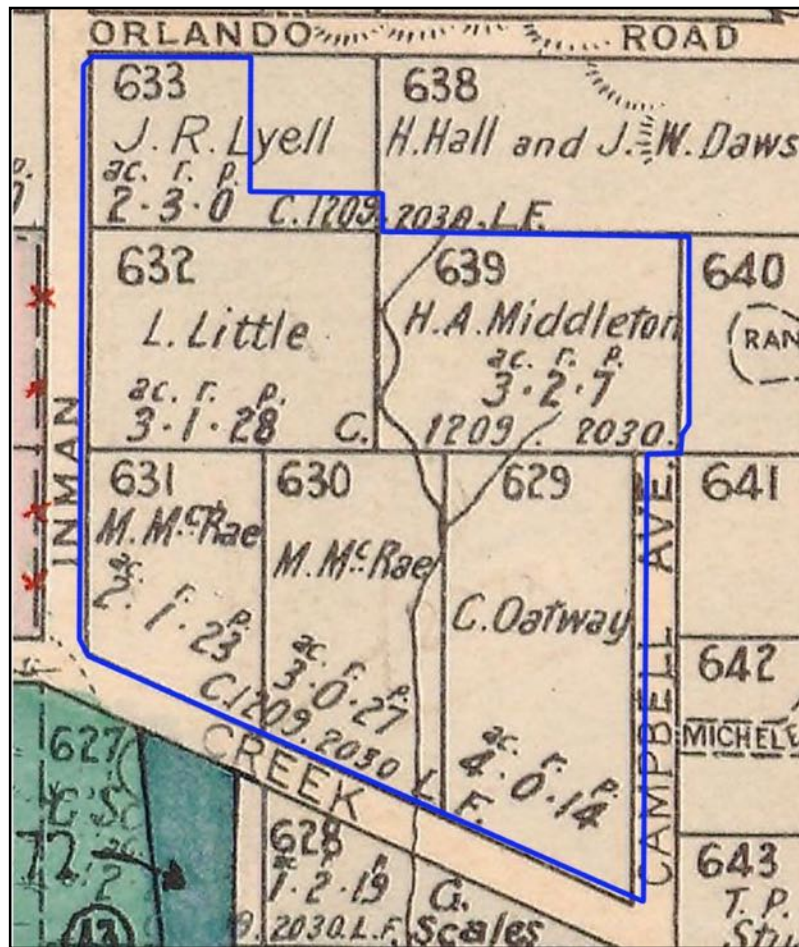


Figure 4. Detail of undated Parish Map, showing the five relevant land grants, with the approximate location of the subject site outlined in blue. (Source: Manly Cove Regional Charting Map, HLRV, Sheet 3b)

Between 1962 and 1975, Roche – a pharmaceutical company founded in 1896 – purchased the land that would eventually form the subject site. Roche purchased the majority of the allotments in 1962 from Yugoslavian market gardeners, in particular the Sekulich family, who at the time owned the majority of the western part of the site. Some of the north-eastern allotments were purchased in 1964 and 1971 from Fibrecell Products Pty Ltd, while one of the southern allotments was purchased in 1972 from Latipac Pty Ltd.

The sites purchased from Fibrecell and Latipac contained some of the 645 factories, which in 1966 employed more than eight thousand people in Warringah. Dee Why (including Cromer) was at the time a rapidly growing outer Sydney suburb able to supply potential labour. Factories employed a variety of workers, including production and packaging staff, salespeople, and administration.⁶

⁵ NSW Land Registry Services, Certificates of Title, Vol 993 Fol 168, Vol 993 Fol 177, Vol 1005 Fol 186, Vol 1047 Fol 20, Vol 2454 Fol 212, Historical Land Records Viewer, <https://hlrv.nswlrs.com.au>.

⁶ Roche, "Roche Milestones," www.roche.com/about/history.htm; Macleod V & A Smith, *People, Precision, Perfection*.

Construction of Building 1, 2 and 3 (designed by Stafford, Moor & Farrington) started in 1963 and was completed in 1964. In September 1964, Roche advertised for a gardener to develop and maintain the landscaped grounds.



Figure 5. 1963 photo of Building 1 during construction. (Source: Roche, Corporate Affairs)



Figure 6. 1964 photo of Building 1, 2 and 3 after completion. Note the lack of landscaping. (Source: Roche, Corporate Affairs)



Figure 7. 1964 photo of Building 1 after completion. Note: some landscaping has been undertaken. (Source: Roche, Corporate Affairs)



Figure 8. 1964 photo of Building 1 after completion. Note: some landscaping has been undertaken. (Source: Roche, Corporate Affairs)



Figure 9. Undated aerial of the site, c.1965. (Source: Macleod and Smith, *People, Precision, Perfection*, 65)



Figure 10. Undated aerial of the site, c. 2006. (Source: Roche, Corporate Affairs)

During their ownership of the subject site, Roche constructed and renovated the buildings on the site to suit the needs of the company. The following chronology of the site provides a concise description of the sites development, including the works conducted by Roche:

Table 1: Chronological history of the development of the site 1789-1987

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 B17
1930-1943	Creation of tennis court (B51)
1949-1961	Construction of B5
1962	Roche start of acquisition of site (predominantly western half)
1962-1972	Construction of B10 (by Fibrecell)
1962-1972	Construction of B18 (by Latipac / Capital Wires)
1963	Roche starts marketing Valium
1963-1964	Construction of B1, B2 & B3
1968	Cottage (B5) converted into office
1969	First batch of effervescent vitamin products manufactured
1969	Extension to B3 and construction of B6
1970	Pantene shampoos & hair dyes launched & manufactured
Early 70s	Construction of B8
1972	A/C installed in B3 including in the 'encapsulating room'
1972	Addition constructed to B6
1972-1974	Construction of Givaudan (B19)
1973-1974	Construction of B7 & B11
1974	Research Institute of Marine Pharmacology opened (B7 & 11)
1974	Construction of B20
1974	Renovations & additions to B18
1975	Roche end of acquisition of site (predominantly (eastern half)
1975	Construction of B40
1975	Cottage (B17) converted into office
1975	Extension to B6
1975	Internal alterations to B3
1975	Installation of boundary fence
1976	Lower section of B11 closed in

Date	Event
1977	New reinforced concrete floors in parts of B7 & alterations to L3 & L4 of B7
1977	Four flagpoles installed at entry to B1
1978	Warehouse addition to B10
1980	Construction of B41
1981	Institute of Marine Pharmacology shut down
1983	Alterations to common areas of B7
1983	New cool & cold rooms to B18
1985	External staircases constructed to western elevation of B1 & B6
1990	New carpark to N of B10
1990	Office alterations & additions to B19
1995	Alterations to B1 reception & B6 partitioning
1995	Refurbishment of B17
1995	Alterations to B7
1995	Installation of B44
1996	B8 rebuilt
1996	Alterations to B7 & 11
1998	Alterations to B3 (internal staircase & roof alterations)
1998	Refurbishment & re-partitioning of B1, B2, B6 & B7
1998	Refurbishment of B17 & introduction of ramp & porch
1998	New carpark to S of B3
1998	New awning to loading dock of B18
1998	Installation of B49
1999	Extension to B19
2001	Construction of Centre of Excellence (B9)
2001	Extension to B3
2001	Refurbishment of B19
2005	Alterations to B18
2006	Construction of B22
2006	Renovations to B1 & B6
2006	Upgrade of B2 mechanical plant
2006	Major demolition to B10
2006	New carpark to N of site
2006	B7: conversion of storage to office space & construction of fire stairs & walkway
2007	Roche manufacturing ceased
2017	Roche undertook remediation program
2018	Site sold to EG Funds Management

Figure 11 below, provides a visual overview of the historical development of the site and the construction of buildings and structures.

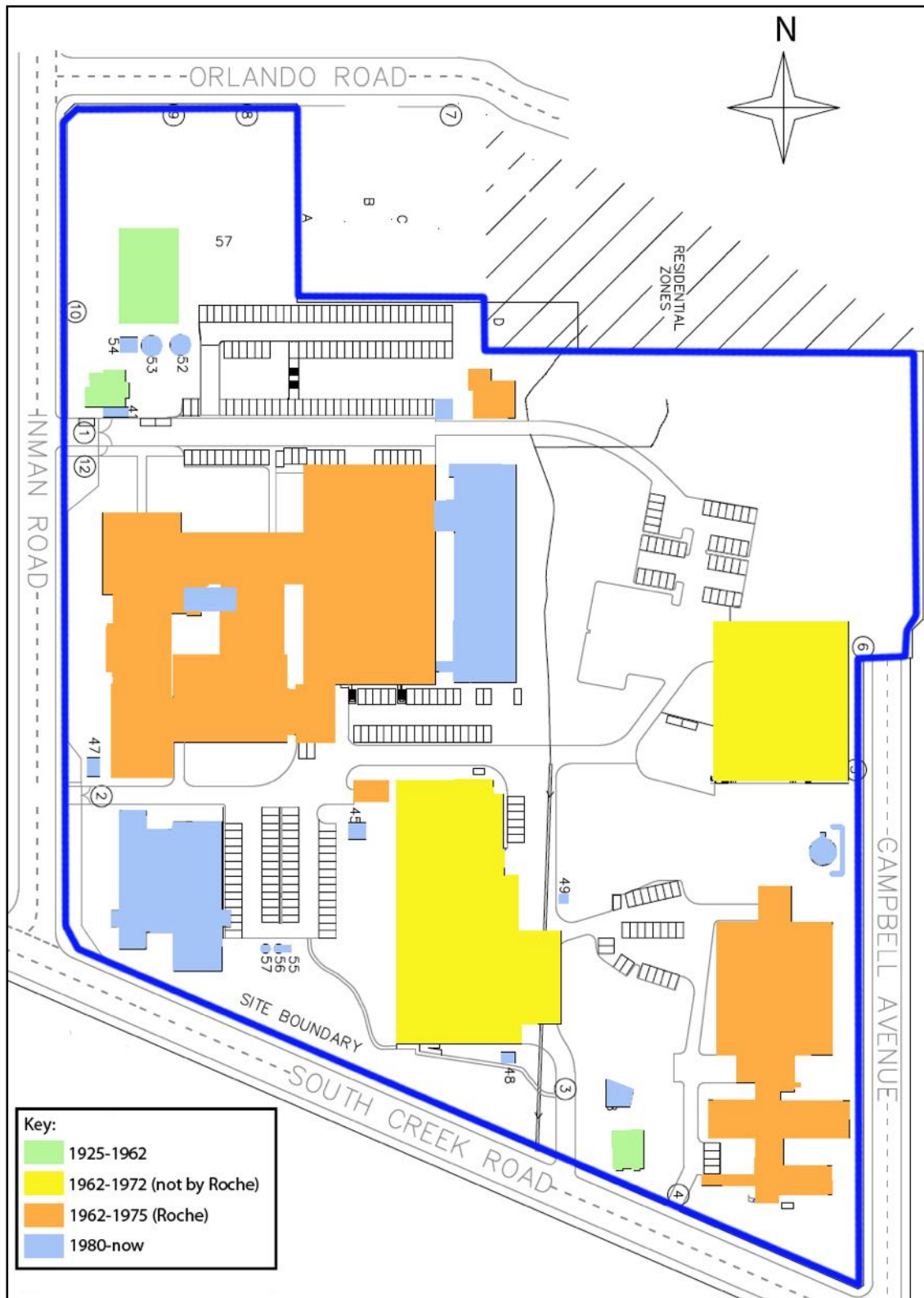


Figure 11. Current site diagram reflecting building phases.



Figure 12. 1965 historic aerial of the subject site showing that Building 06 was not constructed and the western boundary did not exhibit any landscaping. (Source: NSW Historic Imagery Viewer, available on <https://portal.spatial.nsw.gov.au/portal/apps/webappviewer/index.html?id=f7c215b873864d44bccdda8075238cb>)



Figure 13. 1971 historic aerial of the subject site showing that there was sparse landscaping along the western boundary. (Source: NSW Historic Imagery Viewer)

3.0 PHYSICAL EVIDENCE

3.1 The Setting

The subject site is located at 4-8 Inman Road, Cromer (Lots 1, 2 and 3/ DP1282038). The site is bounded by South Creek Road to the south and Inman Road to the west. The north-western corner of the site is bounded by Orlando Road to the north, with the boundary stepping down towards Campbell Avenue, which forms the majority of its eastern boundary.⁷

Land to the south, north and north-west of the site exhibits industrial buildings, while land to the east and north-east is the site of low-density residential dwellings. Many of the dwellings are post-war 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).

The site includes a considerable number of trees, especially in the eastern half of the site, but also along most of the site's boundary. The trees in the eastern section of the site are heritage-listed (as Item I38) in the *Warringah Local Environmental Plan 2011*. The south-eastern section of the site includes the gardens surrounding the heritage-listed cottage (B17), with a majority of non-native species: Figs, Pines, Camphor Laurels, Turpentine, Agonis species, Melaleuca species, Willows, Brush Box, Coral Trees, Elms, Planes, Jacarandas, Magnolias, Tree Ferns and Eucalypts.

3.2 Physical Description

3.2.1 The Roche Complex, Buildings 1, 2 and 6

Building 1 and 2

Building 1 was part of the three buildings constructed first by Roche in 1963-1964. Built to the ideas of the Modern movement and International style, the building uses cubic volume and straight lines set in steel, glass and concrete especially suited to the industrial use of the building. Large curtain walls embedded within overhanging flat-slab roofs, the building retains its austere and minimal visual appearance, so particular to the ideas of corporate modernism popular at the time. Internally, the building utilizes clear and solid lines to reinforce the ideas of rectilinear form with the use of plane surfaces, devoid of any ornamentation. Open plan and fluid spaces are interspaced with functional elements such as staircases. Large curtain windows bring in natural light, creating a harmony between appearance and function.

Building 2 includes a large canopied flat slab roof suspended over glass curtain walls. The single storey off-form concrete building features a large open plan interior.

⁷ Heritage 21, *Conservation Management Plan – 100 South Creek Road, Cromer* (Alexandria: Heritage 21, May 2019).

Building 6

Building 6 is an extension to Building 1 with deep-set ground floor walls, elevating the entire structure off the ground. The flat slab functional roof together with the long horizontal windows create the illusion of volume over mass. Open internal layouts devoid of massive load bearing walls remove movement constraints, thus improving circulation, ventilation and illumination.

3.3 Images

The following photographs have been taken by Heritage 21 at the site inspection undertaken on 14 May 2024, unless stated otherwise.



Figure 15. View from Inman Road facing east towards Building 2.



Figure 16. View from within the subject site facing south towards Building 2 and Building 11.



Figure 17. View from within the subject site facing north towards Unit 5 and Unit 6.

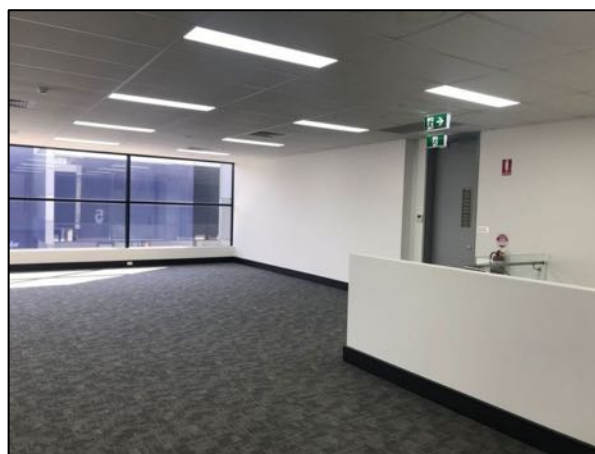


Figure 18. Internal view within Unit 5.

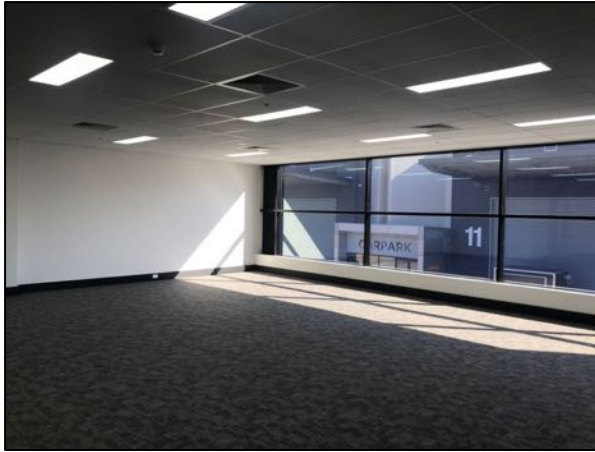


Figure 19. Internal view within Unit 5 facing south towards Building 11.



Figure 20. External view within the subject site 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 subject site (refer to Section 4.1) 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

The following Statement of Significance for the subject site has been extracted from the Conservation Management Plan produced by Heritage 21 in May 2019:

4.1.1 The Subject Site

Parts of the subject site demonstrate heritage significance on a number of levels. The Aboriginal rock art sites on and around the site provide evidence of cultural activities which took place on the land before European occupation. The European occupation of the site includes a mixture of inter-war, post-war and late twentieth century buildings.

The Roche Complex, notably the presentation of Buildings 1, 6 and the hexagonal tower (B11) demonstrate 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 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. This includes the creation of the internal courtyard, which was developed as a common open space with recreational facilities following the construction of additional buildings after 1972.

The hexagonal tower of Building 11 demonstrates landmark qualities, particularly as views to the site are characterised by the towers, with the main views to these towers from Inman Road and South Creek Road.

The interiors of the subject buildings have been altered extensively by consecutive alterations and refurbishments.

The interwar cottage (B17) is a rare survivor of the residential character of the area prior to the industrial rezoning. Together with its garden and the trees in the eastern section of the site, the late 1920s cottage represent the interwar-era occupation of the site. The cottage and garden date back to Stephen Suruvsov's occupation, a gardener from Russian descent, while the trees in the eastern section of the site appear to date back to a 'botanical garden' created by Ronald Smyth King between the 1920s and early 1950s. Even though the cottage exterior is fairly intact, most of its interior was removed during its conversion to offices in 1975 and during a later refurbishment. The building was used as an office for Givaudan (also called Givaudan-Roure), a perfume company owned by Roche.

Some other buildings and structures on the site are of moderate heritage significance. The post-war cottage in the north-western section of the site (Building 5) dates back to the Sekulich family who worked the land as market gardens between 1949 and 1962, reflecting the rural character of the area.

The trees in the eastern section of the site are not individually rare, however this mixed planned collection of trees, the majority of which may have been planted as a botanical garden, in the Dee Why area is rare. The mixed trees in the eastern/south-eastern section of the site are associated with occupation by Smyth King and Suruvsov from the 1920s onwards. The pine trees in the eastern/south-eastern section of the site are associated with occupation by Baylis and/or Hirsch around the turn of the 19th-20th Century. These trees offer a softening effect on the industrial character of the site.

Although it is outside the scope of this report to assess the archaeological potential of the site it is possible that there may be archaeological remnants both of indigenous and non-indigenous nature. For what concerns the historic remnants, these relate to two areas: the north-west corner and the south-east corner of the site.

5.0 WORKS PROPOSED

5.1 Proposal Description

Heritage 21 understand that the proposed development would include:

- Fit-out within Unit 5 and Unit 6

In addition, TMX Transform provided the following summary of works:

Seven Miles Coffee Company are opening a new coffee roasting and production facility in Cromer, NSW. The facility combines units 5 & 6 creating a floor area of 2162m² which will consist of the following:

1. Office space to accommodate 30 staff members.
2. Total quantity of staff members, 50 (30 White Collar + 20 Blue Collar).
3. Enclosed offices & meeting rooms
4. Kitchen/Lunch facilities
5. Storage / racking to accommodate 320x pallets.
6. Space to store and charge 2x MHE
7. Control Room
8. Quality assurance / coffee tasting area.

5.2 Background

5.2.1 Considerations of Alternatives

Heritage 21 was not involved in the design process of the proposed fit-out. 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 Watson Young, dated 23 May 2024 and received by Heritage 21 on 24 May 2024. These are reproduced below for reference only; the full set of drawings accompanying the development application should be referred to for any details.

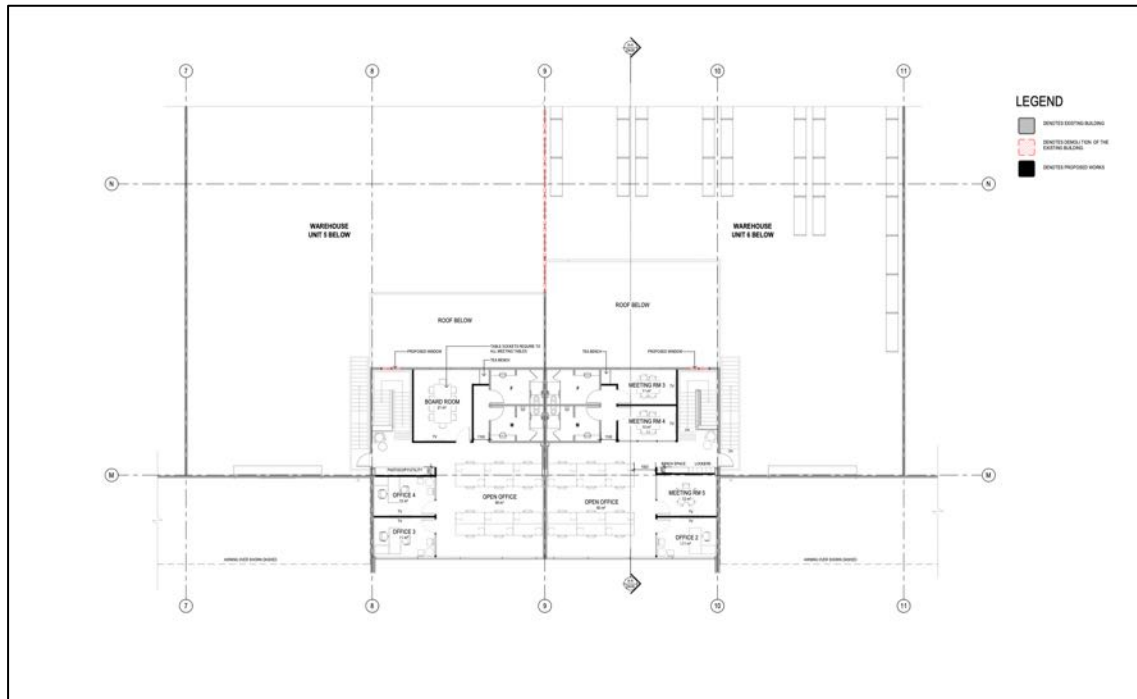


Figure 23. Mezzanine Floor Plan

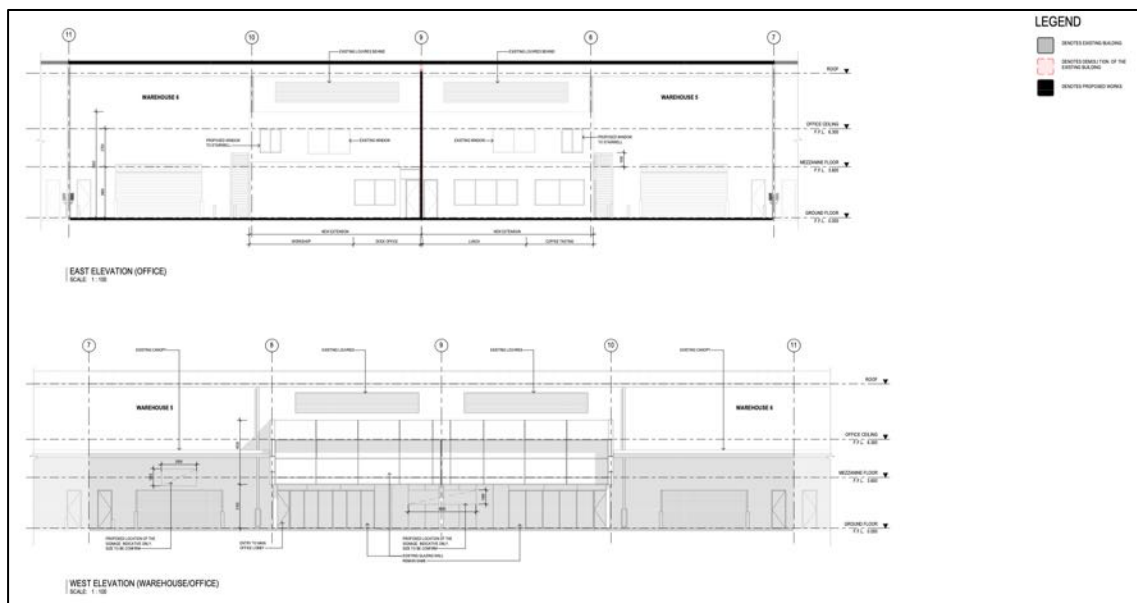


Figure 24. East and West Elevation

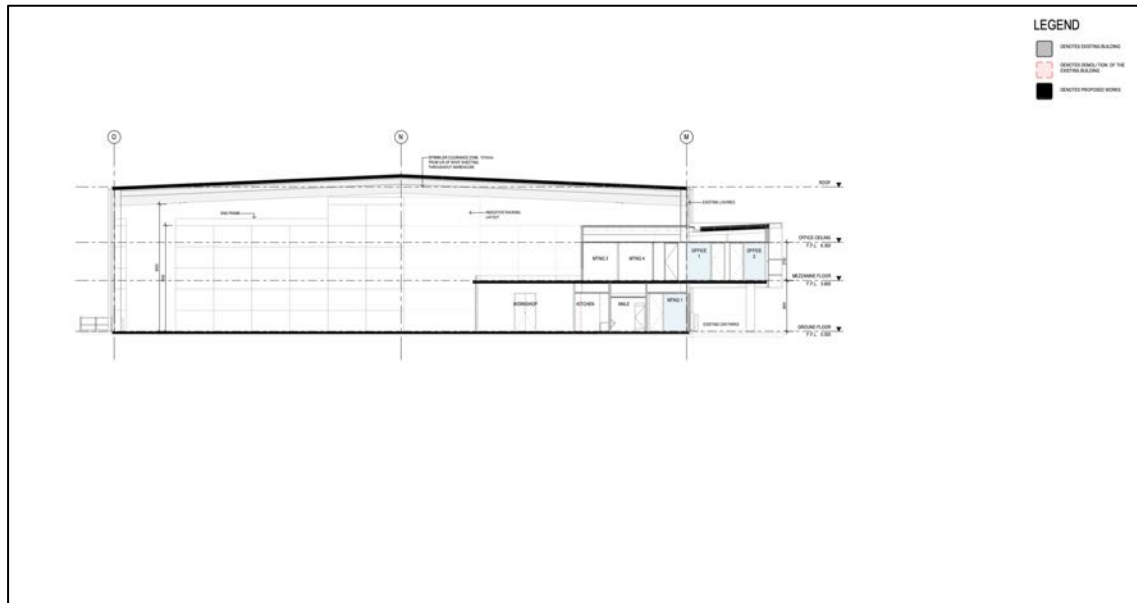


Figure 25. Section AA

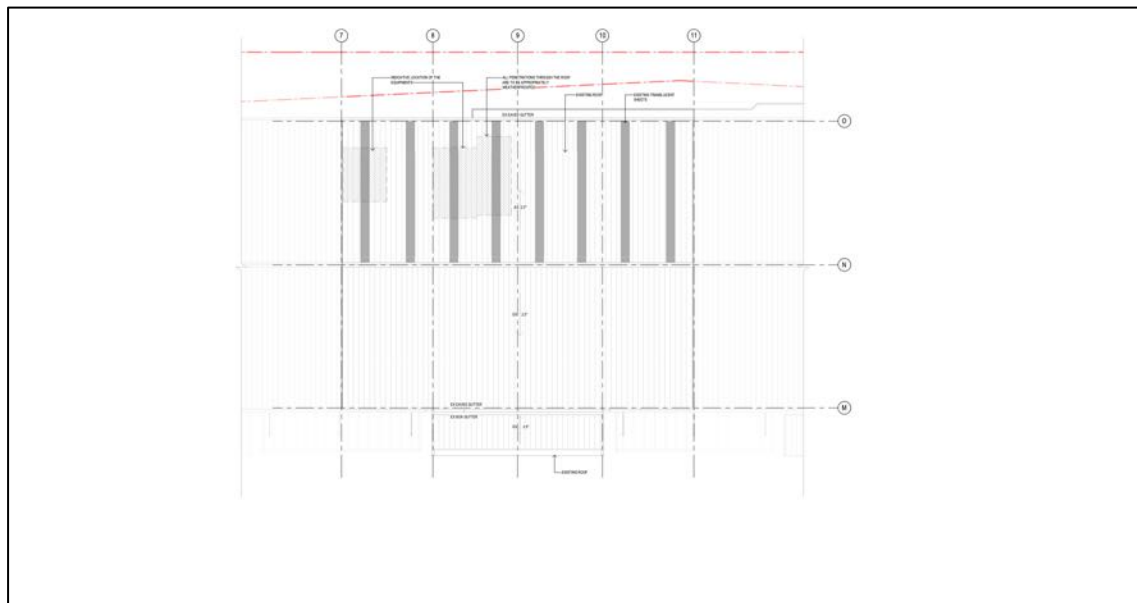


Figure 26. Roof Plan

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* ("WLEP") 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) Heritage conservation management plans*

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 Conservation Management Plan – 100 South Creek Road, Cromer

The following sections of the Conservation Management Plan ("CMP") produced by Heritage 21 in May 2019 for the subject site, are relevant to the proposed development. These include:

Section 7.0 – Constraints and Opportunities

Section 8.0 – Development of Conservation Policies

Section 9.0 – Conservation Policies

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.⁸ 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 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?*

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 subject site. This assessment is based upon the Historical Context (refer to Section 2.0), the Physical Evidence (refer to Section 3.0), Heritage Significance (refer to Section 4.0) the Proposal (refer to Section 5.0) and a review of the Heritage Management Framework (refer to Section 6.1).

6.2.1 Impact Assessment against the WLEP 2011

The statutory heritage conservation requirements contained in Section 5.10 of the *Warringah LEP 2011* 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	The proposal entails work to sites and places listed as heritage items under Schedule 5 of the <i>Warringah LEP 2011</i> . It is our general assessment that the proposed works are limited within the interiors to fabric of little significance and as such would not alter the height, scale, massing of the existing building. The proposed works (as detailed in Section 5.0 above) would not engender a negative impact on the heritage significance of the subject site and the heritage buildings of high significance located within the subject site, including their contributory fabric and general setting.
(2) Requirement for consent	This Development Application is lodged to Council to gain consent for the works proposed in the vicinity of heritage items listed under Schedule 5 of the <i>Warringah LEP 2011</i> .
(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 items located in the vicinity of the site.
(5) Heritage assessment	

6.2.2 Impact Assessment Against the WDCP 2011

The proposed development would involve the internal fit-out of Building 2 (Unit 5 and Unit 6) within the subject site. The proposed works would not involve the modification or removal of heritage significant fabric such as the Hexagonal Tower which is integrated into Warehouse Unit 11. The proposed internal fit-out would also not involve modifications to the façade of Building 2 or to the nearby heritage significant structures. The proposed interior works would be limited to the interiors of Unit 5 and Unit 6, and the alterations would be to contemporary fabric of little heritage significance. The proposal would not entail any additions to the building which would alter the form, bulk, or scale of the heritage buildings.

As such, Heritage 21 is of the opinion that the proposed internal fit-out would not engender a negative impact on the heritage significance of the site nor identified heritage significant structures located in the vicinity of the subject building, including their contributory fabric and general setting.

The proposed fit-out has been designed to minimise potential impacts on the nearby Hexagonal Tower and would not overwhelm or detract from its visual prominence within the site.

6.2.3 Impact Assessment against the 100 South Creek Road, Cromer NSW – Conservation Management Plan 2019

Policy	Heritage 21's Response
<p><i>Policy 1.3 – Damage to Significant Aspects</i> <i>Works that would adversely impact on significant areas, elements or fabric of the place should only be permitted where:</i></p> <ul style="list-style-type: none"> •The work makes possible the recovery of aspects of greater significance; •The work helps ensure the security and viability of the place; •There is no feasible alternative (e.g. to meet safety requirements); •The area, element, or fabric is adequately recorded and, where appropriate, interpreted; and •Full assessment of alternative options has been undertaken to minimise adverse impacts. 	<p>The works would be limited to areas of little significance and would retain all fabric of high significance. The proposed fit-out would be located within the internal areas of Unit 5 and Unit 6 of Building 2. The proposed works would be limited to the interiors of Unit 5 and Unit 6, and the alterations would be to contemporary fabric of little heritage significance. As such, Heritage 21 is of the opinion that the proposed modifications would not engender a negative impact on the heritage significance of the site and associated heritage fabric.</p>
<p><i>Policy 4.1 – Expert Heritage and Conservation Advice</i> <i>Persons with relevant expertise and experience in heritage and conservation projects should be involved in the consistent interpretation of this CMP and the resolution of conservation issues.</i></p>	<p>Heritage 21 has visited the site and is of the opinion that the proposed development would be limited to contemporary fabric and would not involve the modification or alteration of identified heritage significant fabric. As such, Heritage 21 is of the opinion that the proposed development has been designed to ensure that the heritage significance of the site would be retained.</p>
<p><i>Policy 4.2 – Tradespeople</i> <i>All future works undertaken at the site should be carried out by suitably qualified and experienced tradespeople. Reference should be made to the Heritage Branch list of qualified tradespeople for each trade – refer to the Heritage Branch website.</i></p>	<p>Noted.</p>
<p><i>Policy 5.2 – Proposed Alterations to Fabric of Little Significance</i> <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'.</i> <i>Demolition of such spaces or elements is generally permissible where appropriate. Any new work</i></p>	<p>The works that would be a part of this proposal would be limited to later addition fabric of little significance ensuring that the works would not detract from the significance of the subject building and site.</p>

<p><i>proposed to such spaces identified as possessing little significance should, wherever possible, be sympathetic to the original fabric and spaces.</i></p> <p><i>Any modification to fabric of little significance is to be subject to a formal Statement of Heritage Impact in accordance with the Heritage Branch guidelines.</i></p>	
<p>Policy 5.3 – Proposed Alterations to Fabric of Intrusive Significance</p> <p><i>Proposed changes to fabric identified in this CMP as being ‘intrusive’ 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’.</i></p> <p><i>Such intrusive spaces and elements should be removed or modified so as to eliminate or minimise their detrimental impact on the significance of the site.</i></p> <p><i>Any removal of intrusive fabric is to be subject to a formal Statement of Heritage Impact in accordance with the Heritage Branch guidelines.</i></p>	<p>The proposal has been designed in consideration of the CMP, to ensure that the proposed internal fit-out of Unit 5 and Unit 6 of Building 2 would not detract from the significance of the subject building and site. The proposed works would be sited within the internal areas of Unit 5 and Unit 6 and would thus not be visible from the public domain. The proposed fit-out would also not involve modification or removal of heritage significant fabric and would thus, not detract from the significance of the subject site.</p>
<p>Policy 8.1 – External Views</p> <p><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 proposal would be limited to alterations to internal areas of Unit 5 and Unit 6. The works would not alter the bulk or the scale of the building and would not be visible from the exterior.</p>
<p>Policy 8.2 – Internal Views</p> <p><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 proposed works would be limited to the interiors of Unit 5 and Unit 6 and the alterations would be to contemporary fabric. The proposal would not entail any additions to the buildings which would alter the form, bulk, or scale of the heritage buildings. The proposal would maintain the building envelope of the heritage buildings and would not alter their external presentation. As such, the views to the heritage listed buildings of high significance would be maintained within the complex.</p>

6.2.4 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 aiming at directing and triggering heritage impact assessment. 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,</i>	As shown in Section 5.0 above, the proposed internal fit-out would incorporate clearly contemporary form and detail. It is our

Question	Assessment
<i>specifically Practice note article 22 – new work (Australia ICOMOS 2013b)?</i>	opinion that that this would comply with Article 22. <i>New Works of the Burra Charter</i> which states that <i>New work should be readily identifiable as such, but must respect and have minimal impact on the cultural significance of the place.</i>
<i>Are the proposed alterations/additions sympathetic to the heritage item? In what way (e.g. form, proportion, scale, design, materials)?</i>	The works would be limited to areas of little significance and would retain all fabric of high significance. The proposed fit-out would be located within the internal areas of Unit 5 and Unit 6 of Building 2. As such, Heritage 21 is of the opinion that the proposed internal modifications would not engender a negative impact on the heritage significance of the site and associated heritage fabric.
<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 proposed works would be limited to the interiors of Unit 5 and Unit 6 and the alterations would be to contemporary fabric. The proposal would not entail any additions to the buildings which would alter the form, bulk, or scale of the heritage buildings. The proposal would maintain the building envelope of the heritage buildings and would not alter their external presentation. As such, it is our assessment that the views to the heritage listed buildings of high significance would be maintained within the complex.
<i>How have the impact of the alterations/additions on the heritage item been minimised?</i>	These proposed modifications would not be visible from the exterior and would not visually dominate view lines to the Hexagonal Tower or nearby heritage significant fabric. As such, Heritage 21 is of the opinion that the proposed works would not visually dominate the heritage item.
<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>	Unknown, it is beyond the scope of this report.
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 subject site has been approved for use as a business park, facilitating office, commercial and industrial usage. The subject site consists of a number of different tenancies, with different uses. Unit 5 and Unit 6 are currently vacant. The proposal involves an internal fit-out related to the use of Unit 5 and 6 by Seven Miles Coffee Company. It is the opinion of Heritage 21 that the proposed works would facilitate the continued mixed use of the tenancy.
<i>Will the change of use have an impact on the significance of the heritage item?</i>	It is the assessment of Heritage 21 that the proposed use of Unit 5 and Unit 6 would be compatible with the heritage significance of the site.
<i>Will the change of use require changes to the fabric or significant elements?</i>	The proposed works would be sited within Unit 5 and 6 of Building 2 and would not involve modification or alterations to the heritage significant Hexagonal Tower. The proposed internal fit-out would

Question	Assessment
<i>How does that impact significance of the heritage item?</i>	also not involve exterior modifications to the façade of Building 2 or to the nearby heritage significant structures.

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 site:

- The proposed development would ensure the continued use of the site for industrial and office purposes.
- The proposed development would not alter the historic subdivision pattern in the Cromer locality.
- The proposal would not result in the modification or alteration of the Hexagonal Tower located on site, which contributes to the heritage significance of the site.
- The proposed works would be limited to later addition fabric of little heritage significance and would be largely limited to the interior of Unit 5 and Unit 6.
- The proposed works would retain the Hexagonal Tower and would not impact its presentation to Inman Road and the immediate area.

7.1.2 Aspects of the proposal which could have 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 site and 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 therefore confident that the proposed development complies with pertinent heritage controls and would engender no negative impact on the heritage significance of the subject site, the 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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