

STATEMENT OF HERITAGE IMPACT

Proposed Development at

Former Roche Facility

4-8 Inman Road,

CROMER



Job No. 9689
September 2022

Heritage21
CULTURAL BUILT HERITAGE IN THE 21ST CENTURY

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CONSERVATION ARCHITECTS AND HERITAGE CONSULTANTS
Suite 48, 20-28 Maddox Street, Alexandria, NSW 2015
(02) 9519 2521
reception@Heritage 21.com.au

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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.

Cover page: Former Roche Facility, facing towards Buildings 02 & 07. (Source: Heritage 21, 02 July 2020)

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 | Report issued (RI) for DA. | 27.09.2022 | KT | EM | KT |

1.0 INTRODUCTION

1.1 Background

This Statement of Heritage Impact ('SOHI' or 'report') has been prepared on behalf of Willowtree Planning 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', 'the site' and 'the subject 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 is legally described as Lot 1, Deposited Plan (DP) 1220196 and falls within the boundaries of the Northern Beaches Local Government Area (LGA).

The setting and topography of the site will be more fully described in Section 3.0 below.



Figure 1. Aerial view of the site, which is highlighted in yellow (Source: NSW Land and Property Information, 'SIX Maps', n.d., <http://maps.six.nsw.gov.au/>).

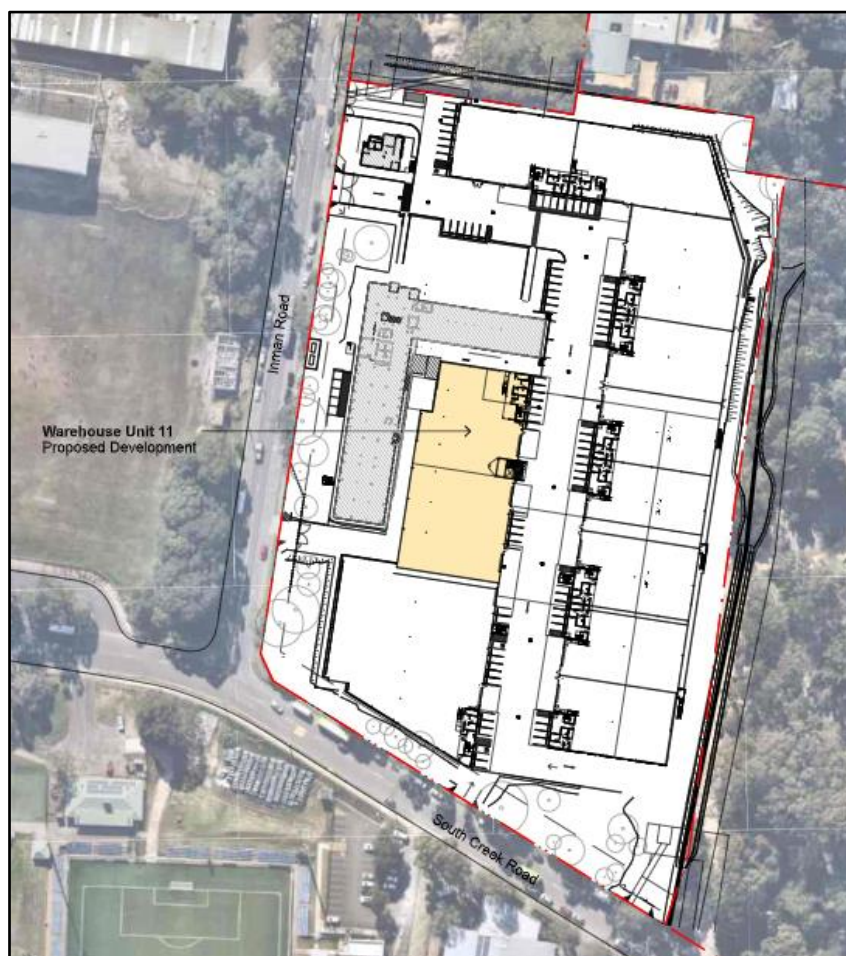


Figure 2. Excerpt from Proposed Site Plan, showing the location of Unit 11 within the proposed development.

1.3 Heritage Context

1.3.1 Heritage Listings

As depicted in Figure 2 below, the subject site **is** listed as an item of environmental heritage in Schedule 5 of the Warringah Local Environmental Plan 2011 ('WLEP'). The site **is not** listed on any other statutory or non-statutory registers.

The details of the site's listings are as follows:

| Statutory List – Legislative Requirements | | | | |
|---|-------------------------|----------------------|--------------|----------|
| List | Item Name | Address | Significance | Item No. |
| Warringah Local Environmental Plan 2011 | Roche Building | 100 South Creek Road | Local | I52 |
| --- | Givaudan-Roure Building | 96 South Creek Road | Local | I53 |
| --- | Trees | Campbell Avenue | Local | I38 |

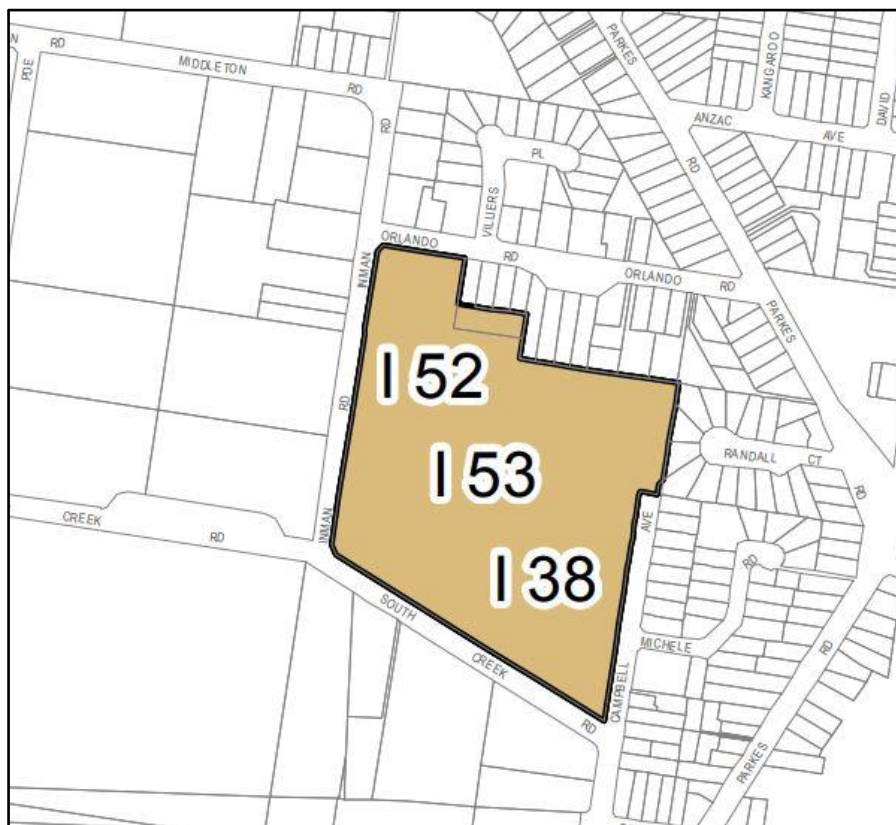


Figure 3. Detail from Heritage Map HER_009. The subject site is outlined in black and heritage items, are marked brown (Source: NSW Legislation Online, <https://legislation.nsw.gov.au>).

1.3.2 Heritage Items in the Vicinity

There are no heritage listed items or heritage conservation areas situated in the vicinity of the subject site.

1.4 Purpose

The subject site is a heritage listed under Schedule 5 of the Warringah LEP 2011 ('WLEP'). 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 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 ('Burra Charter').

1.6 Authors

This Statement of Heritage Impact ('SOHI' or 'report') has been prepared by Kieran Moss, reviewed by Emily McSkimming and overseen by Paul Rappoport, of Heritage 21, Heritage Consultants.

1.7 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.

1.8 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

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 CMP produced by Heritage 21 in May 2019.

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 |
| 1977 | New reinforced concrete floors in parts of B7 & alterations to L3 & L4 of B7 |
| 1977 | Four flagpoles installed at entry to B1 |

| Date | Event |
|------|---|
| 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 4 below provides a visual overview of the historical development of the site and the construction of buildings and structures.

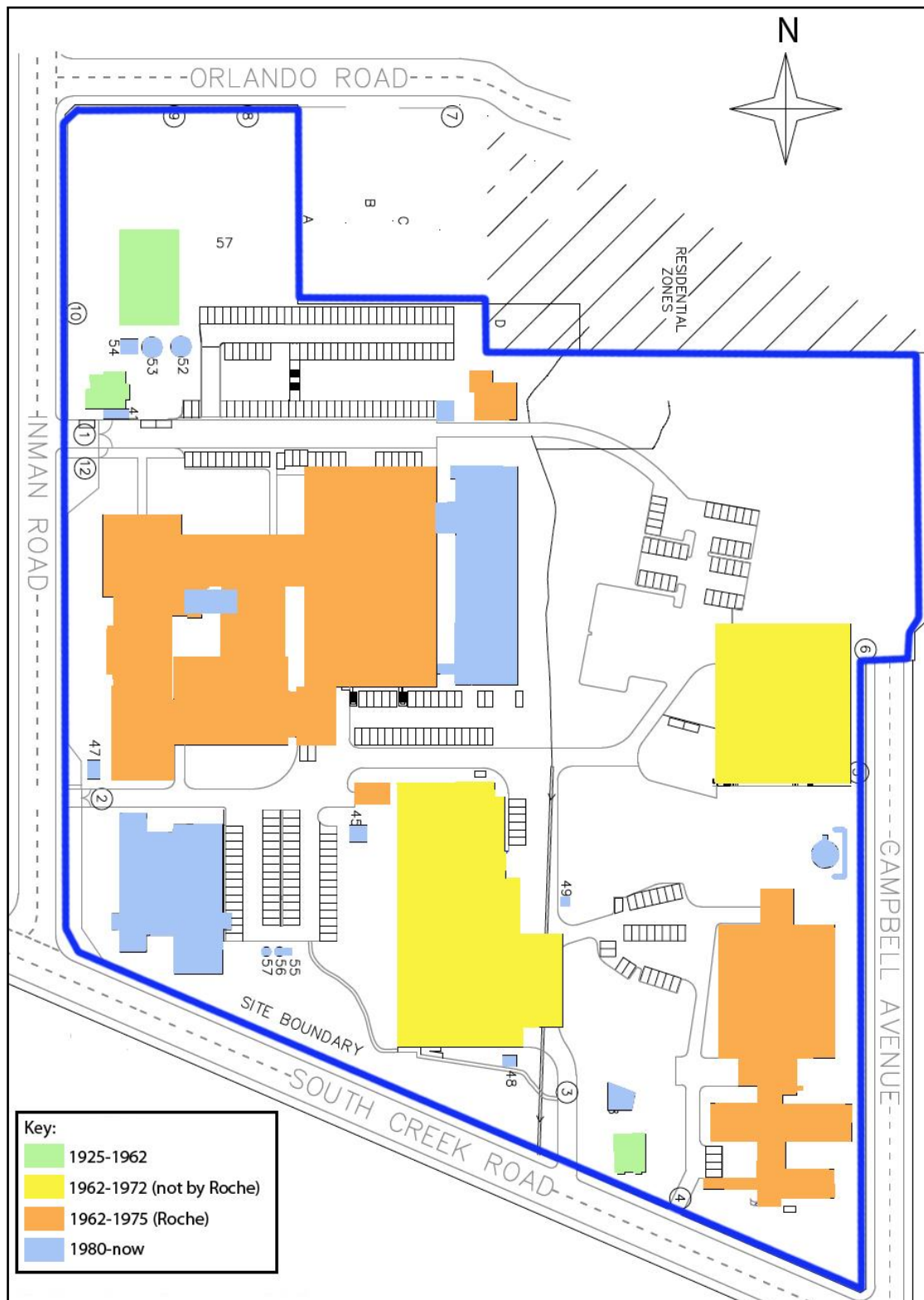


Figure 4. Site diagram reflecting building phases.

3.0 PHYSICAL EVIDENCE

3.1 The Setting

The subject site is located at 100 South Creek Road, Cromer (Lot 1 / DP 1220196). 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.¹

Land to the south, north and north-west of the site include 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).

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 in the Warringah Local Environmental Plan 2011 (L38). 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, 6 & the Hexagonal Tower

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, 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.

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.

¹ Heritage 21, Conservation Management Plan – 100 South Creek Road, Cromer, May 2019.

Constructed in reinforced concrete with flat slab roofing, the five-story tower (Building 11) uses large window bands along its southern elevation to relate to the form and style of adjacent buildings. Along the eastern and western façade large precast concrete sandwich panels create a single minimal box elevation. Internally, exposed services, large open plan rooms and a mix of modern materials echo the industrial use of the facility. The minimal features and naturally illuminated rooms provide an uncluttered feel to the spaces.



Figure 5. View to Building 1 from within the subject site, facing south-east.



Figure 6. View to Buildings 2, 7 & 11 from within the subject site, facing south-east.



Figure 7. View to the side elevation of Building 6 from Inman Road, facing north-east.

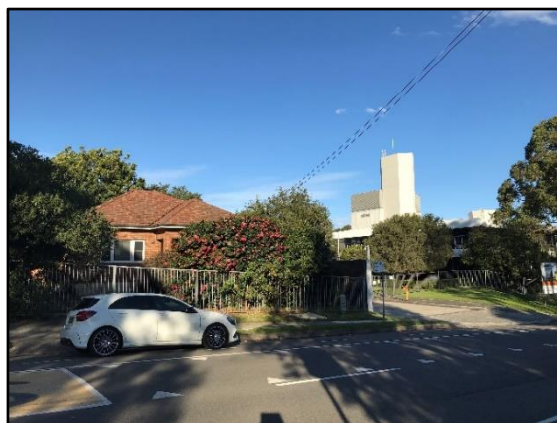


Figure 8. View to the subject site from Inman Road, facing east. Note Building 05 on Inman Road and the landmark qualities of Building 11.

The interiors of the buildings are defined by later addition office fit outs, including partitions and associated services.

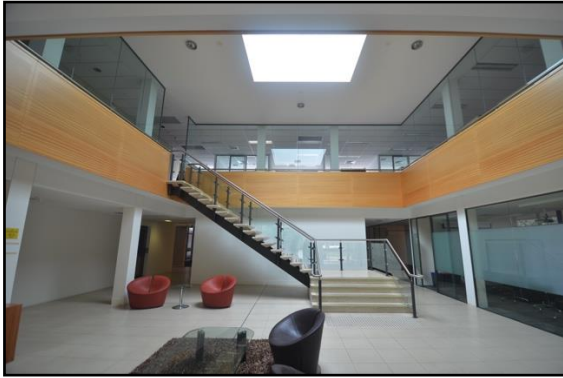


Figure 9. Internal view B1 – Reception area on Level 2 (Ground).²



Figure 10. Internal view B1 – Reception area, Level 2.

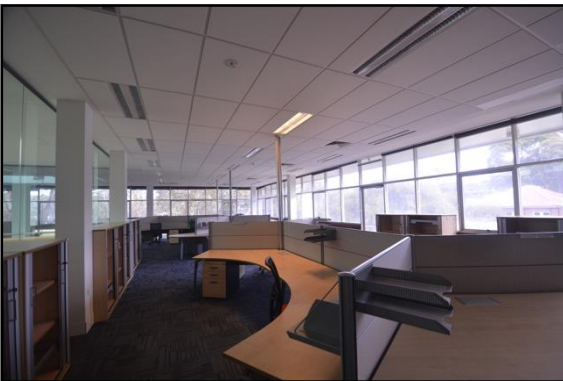


Figure 11. Internal view B1 – Level 3 / Mezzanine Level.

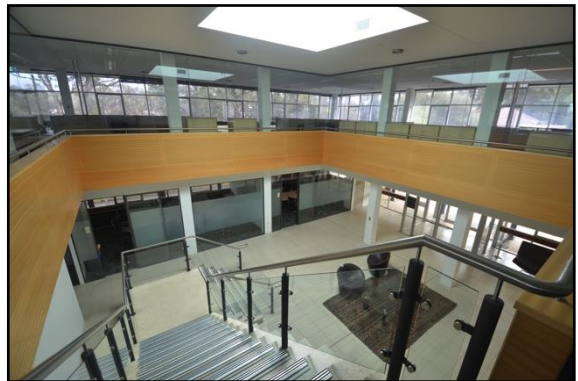


Figure 12. Internal view B1 – Level 3 / Mezzanine Level.



Figure 13. Internal view B2 – Level 2 (Ground).



Figure 14. Internal view B2.

² Level 1 does not exist in B1.



Figure 15. View to the interior of a meeting space within Building 2.



Figure 16. View to the interior of office spaces within Building 6.



Figure 17. Internal view B6 – Dining area; Level 1

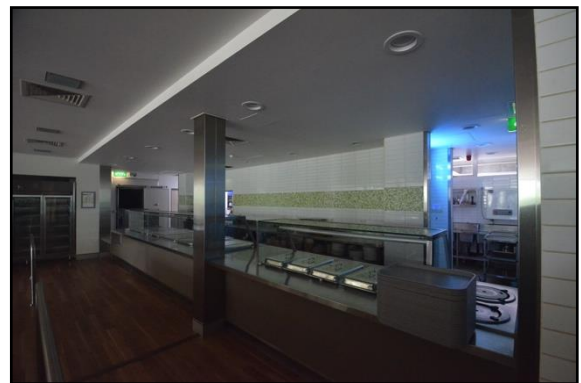


Figure 18. Internal view B6 – Kitchen; Level 1.



Figure 19. Internal view B6 – Spiral staircase; Level 2.

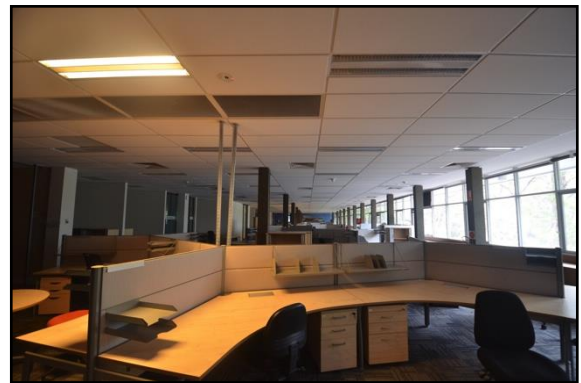


Figure 20. Internal view B6 – Offices; Level 2.

3.2.2 Building 5

Building 5 is a single storey brick cottage, situated on Inman Road and directly adjacent to the Inman Road entrance to the site. With a sandstone masonry base, the cottage is accessible by a ramp to the eastern elevation and stairs to the western elevation. With a terracotta tiled hipped roof, the openings comprise of a combination of timber and aluminium framed windows, and timber doors.



Figure 21. View to the primary elevation of Building 5, facing east.



Figure 22. View to the rear, eastern elevation of Building 5, facing south-west.



Figure 23. Looking south-east towards the northern and western elevations of B5.



Figure 24. Looking south-east towards northern and western elevation of B5.

The interior of the cottage comprises of offices, meeting rooms and bathroom facilities. Remnant features include curved masonry walls, architraves and skirting and timber cabinets.



Figure 25. View to the interior of the enclosed verandah.

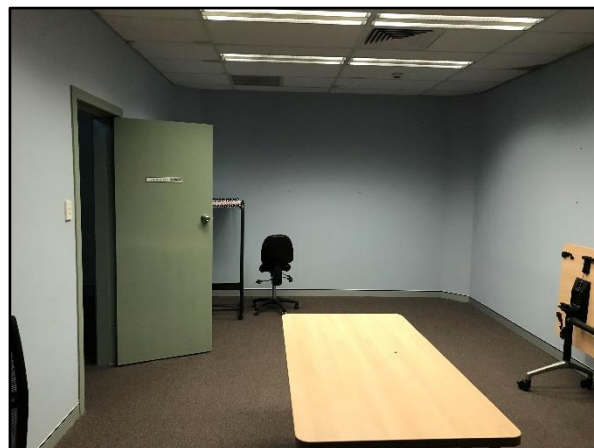


Figure 26. View to the interior of a meeting room.



Figure 27. View to the internal kitchen fit out.

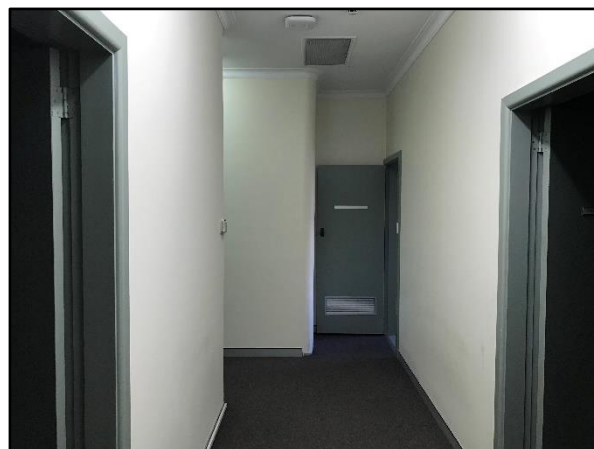


Figure 28. View to the internal corridor.

3.3 Condition and Integrity

The subject site is currently being redeveloped as part of a commercial development. The majority of buildings have been demolished as part of this development. Heritage significant buildings, including Buildings 1, 2, 6, 5 and the Hexagonal Tower have been retained to retain the legibility of the Roche factory's original scale and character.

3.4 Images

The following photographs have been taken by Heritage 21 at the site inspection undertaken on 21 September 2022, unless stated otherwise.



Figure 29. Exterior view of the subject site, taken from the corner of Inman Road and South Creek Road, facing northeast.



Figure 30. Exterior view of the subject site, taken from the corner of Inman Road and South Creek Road, facing east.



Figure 31. Exterior view of the subject site, including the Hexagonal Tower, taken from South Creek Road, facing northeast.



Figure 32. Exterior view of the site, showing where building 11 is to be constructed, facing north.



Figure 33. Exterior view of the site, showing the retained Hexagonal Tower and where Building 11 is to be constructed.



Figure 34. Exterior view of the site, showing the retained heritage significant buildings.



Figure 35. Exterior view of the site, showing the driveway access to Building 11 and the retained heritage significant building.



Figure 36. Exterior view of the site, showing the existing demolition works.

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

The proposed development would include:

- Internal fit-out of Warehouse Unit 11, including:
 - Reception
 - Putting Lab
 - Bathrooms
 - Kitchen
 - Retail space
 - Party rooms
 - Mini Golf course
 - Club Fitting Facility
 - Simulator Bays
 - Gold Driving range
 - Gold Pitching Range
 - Saunas
 - Physio space
 - Office.
- Construction of parking spaces.

5.2 Drawings

Our assessment of the proposal is based on the following drawings by SBA Architects Pty Ltd, dated 10 August 2022 and received by Heritage 21 on 31 August 2022. These are reproduced below for reference only; the full set of drawings accompanying the development application should be referred to for any details.

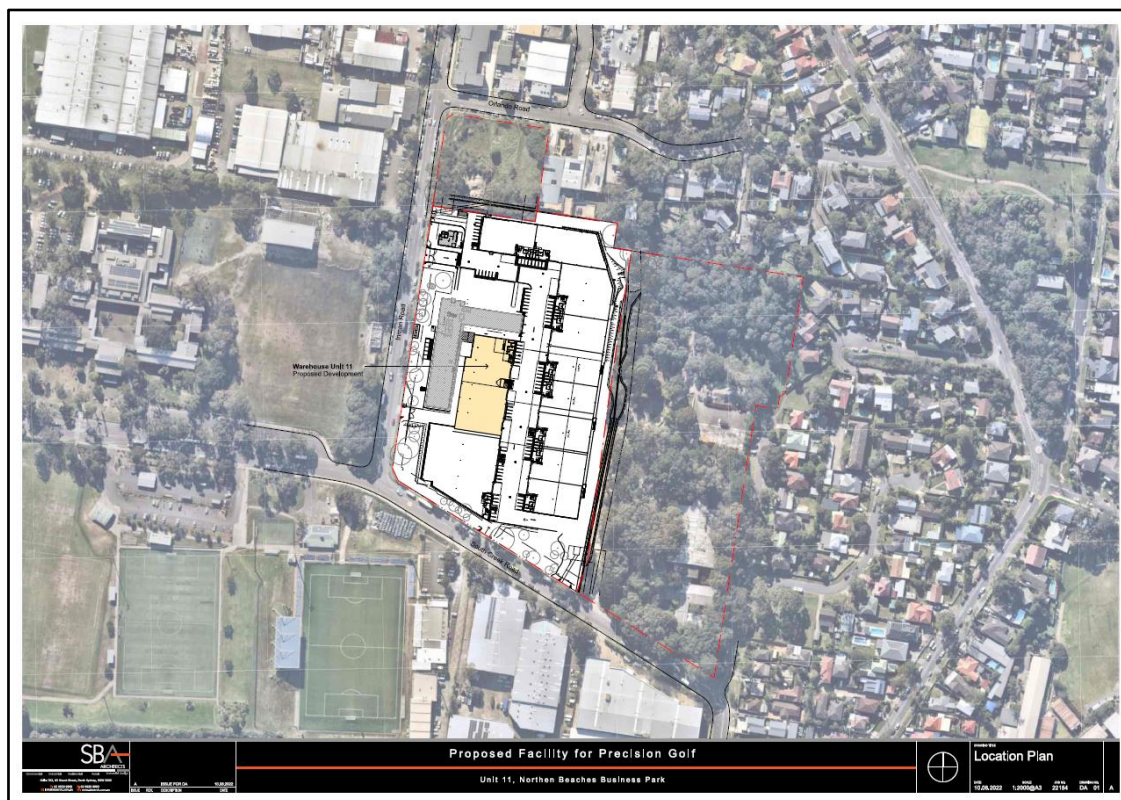


Figure 37. Proposed Location Plan.

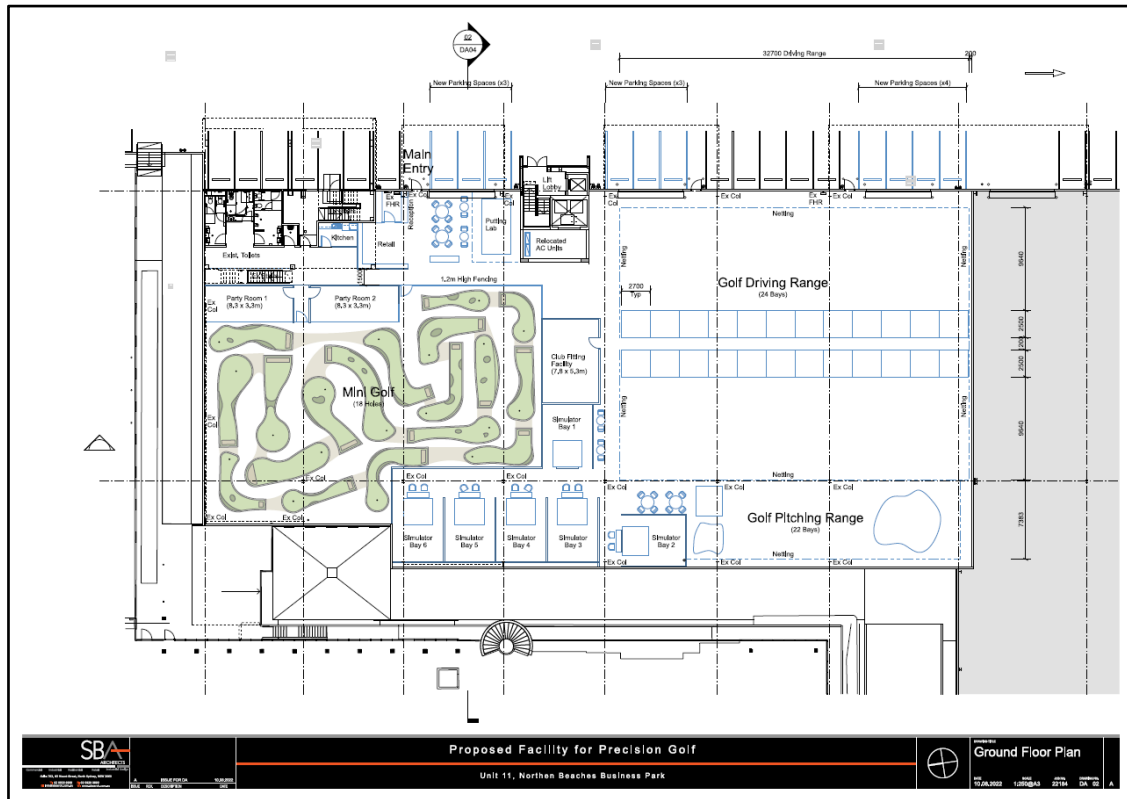


Figure 38. Proposed Ground Floor Plan.

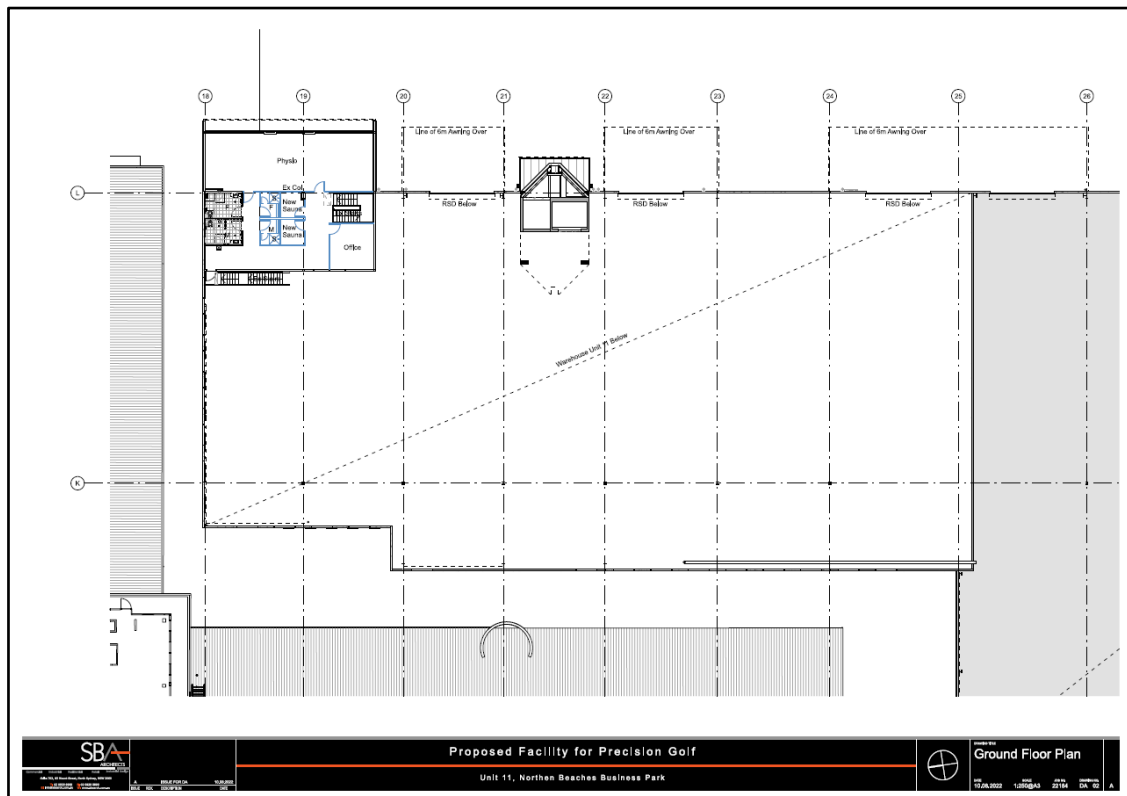


Figure 39. Proposed Ground Floor Plan.

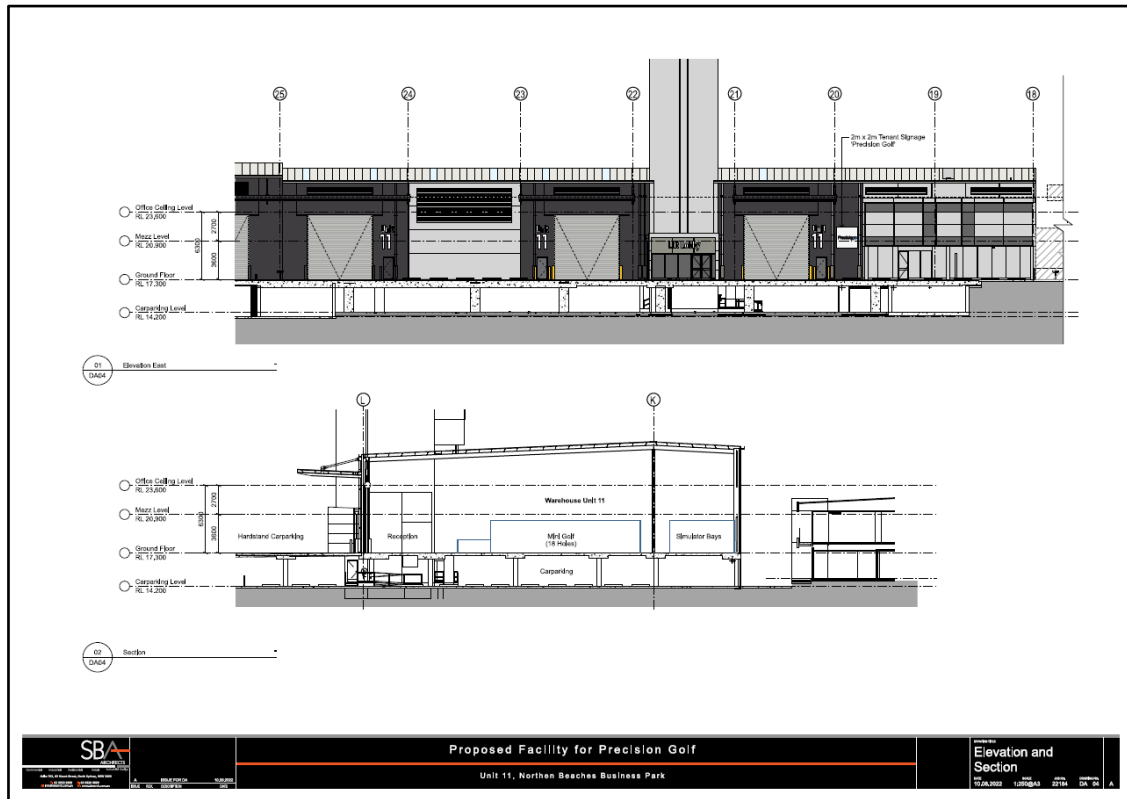


Figure 40. Proposed East Elevation and Section.

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 (WLEP) 2011 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 (WDCP) 2011 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 NSW – Conservation Management Plan 2019

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

Section 7.0 Constraints and Opportunities

Section 9.0 Conservation Policies

6.1.4 NSW Office of Environment & Heritage guidelines

In its guidelines for the preparation of Statements of Heritage Impact, the NSW Office of Environment & Heritage provides a list of considerations in the form of questions aiming at directing and triggering heritage impact assessments. These are divided in 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.

Change of use

- *Has the advice of a heritage consultant or structural engineer been sought? Has the consultant's advice been implemented? If not, why not?*
- *Does the existing use contribute to the significance of the heritage item?*
- *Why does the use need to be changed?*
- *What changes to the fabric are required as a result of the change of use?*
- *What changes to the site are required as a result of the change of use?*

Minor additions (see also minor partial demolition)

- *How is the impact of the addition on the heritage significance of the item to be minimised?*
- *Can the additional area be located within an existing structure? If no, why not?*
- *Will the additions visually dominate the heritage item?*
- *Is the addition sited on any known, or potentially significant archaeological deposits? If so, have alternative positions for the additions been considered?*
- *Are the additions sympathetic to the heritage item? In what way (e.g. form, proportions, design)?*

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), a review of the Heritage Management Framework (refer to Section 6.1) and the impact of the proposal on the relevant heritage item.

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 |
|---|---|
| <i>(1) Objectives</i> | The proposal does not entail any work to sites and places listed as heritage items under Schedule 5 of the Warringah LEP 2011. It is our general assessment that the proposed internal fit-out to Warehouse Unit 11 within the subject site would result in no impact to the heritage significance of the Former Roche Factory. The proposed works would be sited inside a contemporary development and would not involve modification or alterations to the heritage significant Hexagonal Tower. The proposed internal fit-out would also not involve exterior modifications to the façade of Warehouse Unit 11 or to the nearby heritage significant structures. The proposed exterior modifications would be limited to additional parking spaces. These parking spaces would be sited on contemporary fabric and would not involve the modification or alteration of existing heritage fabric. As such, Heritage 21 is of the opinion that the proposed internal fit-out to necessitate the Precision Golf facility 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. |
| <i>(2) Requirement for consent</i> | 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. |
| <i>(4) Effect of proposed development on heritage significance</i> | 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. |
| <i>(5) Heritage assessment</i> | |

6.2.2 Impact Assessment Against the WDCP 2011

The proposed development would involve the internal fit-out of a contemporary building (Warehouse Unit 11) 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 Warehouse Unit 11 or to the nearby heritage significant structures. The proposed exterior modifications would be limited to additional parking spaces and would not involve the modification or alteration of existing heritage fabric. The proposed interior works would also be limited to the interiors of Warehouse Unit 11 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 to necessitate the Precision Golf facility 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 |
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| <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"> • <i>The work makes possible the recovery of aspects of greater significance;</i> • <i>The work helps ensure the security and viability of the place;</i> • <i>There is no feasible alternative (e.g. to meet safety requirements);</i> • <i>The area, element, or fabric is adequately recorded and, where appropriate, interpreted; and</i> • <i>Full assessment of alternative options has been undertaken to minimise adverse impacts.</i> | <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 Warehouse Unit 11, which is a contemporary addition to the site and does not contribute to the site's 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</p> |

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| | ensure that the heritage significance of the site would be retained. |
| <p><i>Policy 4.2 – Tradespeople</i></p> <p><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> | Noted. |
| <p><i>Policy 5.2 – Proposed Alterations to Fabric of Little Significance</i></p> <p><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></p> <p><i>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><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> | 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 of the significance of the subject site. |
| <p><i>Policy 5.3 – Proposed Alterations to Fabric of Intrusive Significance</i></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> | The proposal has been designed in consideration of the CMP, to ensure that the proposed internal fit-out of Warehouse Unit 11 would not detract from the significance of the subject site. The proposed works would be sited within a contemporary addition 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><i>Policy 8.1 – External Views</i></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> | The proposal would be limited to alterations to internal areas of Warehouse Unit 11, which is a contemporary addition to the site. The works would not alter the bulk or the scale of the buildings and would not be visible from the exterior. The proposed exterior modifications would be limited to the construction of additional parking spaces which, in Heritage 21’s opinion, would not visually dominate or |

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| | detract from views to nearby heritage buildings and the Hexagonal Tower. |
| <p><i>Policy 8.2 – Internal Views</i></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 Warehouse Unit 11 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 Office of Environment & Heritage guidelines

As acknowledged in Section 6.1, the NSW Office of Environment & Heritage 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 |
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| Change of use | |
| <i>Has the advice of a heritage consultant or structural engineer been sought? Has the consultant's advice been implemented? If not, why not?</i> | Heritage 21 is of the opinion that the proposed fit-out of Warehouse Unit 11 would not engender a negative impact on the heritage significance of the subject site and associated heritage fabric. The proposed works would be sited within a contemporary addition and would not result in modifications or alterations to heritage significant fabric. |
| <i>Does the existing use contribute to the significance of the heritage item?</i> | The proposed fit-out would be located within Warehouse Unit 11, which is a contemporary addition to the site and does not contribute to the site's 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. |
| <i>Why does the use need to be changed?</i> | The change of use would be necessary to facilitate the proposed construction of the Precision Golf facility. The proposed works would be sited within a contemporary addition to the heritage item and would not engender a negative impact to the heritage significance of the site. As such, Heritage 21 is of the opinion that the change of use would not engender a negative heritage impact. |

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| <i>What changes to the fabric are required as a result of the change of use?</i> | The proposed works would be sited inside a contemporary development and would not involve modification or alterations to the heritage significant Hexagonal Tower. The proposed internal fit-out would also not involve exterior modifications to the façade of Warehouse Unit 11 or to the nearby heritage significant structures. The proposed exterior modifications would be limited to additional parking spaces. These parking spaces would be sited on contemporary fabric and would not involve the modification or alteration of existing heritage fabric. |
| <i>What changes to the site are required as a result of the change of use?</i> | The proposal would require additional parking spaces adjacent to the primary façade of Warehouse Unit 11 in order to facilitate the proposed Precision Golf fit-out. The proposed new parking spaces would not involve the modification or alteration of the heritage significant Hexagonal Tower partially contained within Warehouse Unit 11 and would not involve alterations and additions which would not detract from or overwhelm view lines from the site to the Hexagonal Tower or nearby heritage fabric. The proposed internal fit-out would not involve alterations and additions to heritage significant fabric. The proposed alterations have been designed to be limited to contemporary fabric. |
| Minor additions (see also minor partial demolition) | |
| <i>How is the impact of the addition on the heritage significance of the item to be minimised?</i> | The proposed works would be sited inside a contemporary development and would not involve modification or alterations to the heritage significant Hexagonal Tower. The proposed internal fit-out would also not involve exterior modifications to the façade of Warehouse Unit 11 or to the nearby heritage significant structures. The proposed exterior modifications would be limited to additional parking spaces. These parking spaces would be sited on contemporary fabric and would not involve the modification or alteration of existing heritage fabric. As such, Heritage 21 is of the opinion that the proposed internal fit-out to necessitate the Precision Golf facility 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. |
| <i>Can the additional area be located within an existing structure? If no, why not?</i> | The proposed works would be located within Warehouse Unit 11 which is currently under construction. The proposed development would be sited within a contemporary structure, which would minimise any potential impact of the proposed development on the heritage significance of the site. |

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| <i>Will the additions visually dominate the heritage item?</i> | The proposed works would be largely limited to an internal fit-out of a contemporary addition to the Former Roche Factory. 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. Similarly, the proposed exterior parking spaces would not visually dominate the site and would be limited to later addition fabric. As such, Heritage 21 is of the opinion that the proposed works would not visually dominate the heritage item. |
| <i>Is the addition sited on any known, or potentially significant archaeological deposits? If so, have alternative positions for the additions been considered?</i> | An archaeological assessment is beyond the scope of this report. |
| <i>Are the additions sympathetic to the heritage item? In what way (e.g. form, proportions, design)?</i> | The proposed fit-out would be located within Warehouse Unit 11, which is a contemporary addition to the site and does not contribute to the site's heritage significance. The proposed works would be sited within a contemporary addition and would not result in modifications or alterations to nearby heritage significant fabric such as the Hexagonal Tower. As such, Heritage 21 is of the opinion that the proposed works would be sympathetic to the heritage significance of the subject site and identified heritage significant buildings. |

7.0 CONCLUSION & RECOMMENDATIONS

7.1 Impact Summary

The NSW Office of Environment & Heritage's guidelines require the following aspects of the proposal to be summarised.³

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 a contemporary addition;
- The proposed works would retain the Hexagonal Tower and would not impact its presentation to Inman Road and the immediate area; and
- The proposed additional car spaces would not overwhelm views afforded to the Hexagonal Tower.

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.

³ NSW Office of Environment and Heritage, 'Statements of Heritage Impact' (Heritage Office and Department of Urban Affairs & Planning, 1996), <http://www.environment.nsw.gov.au/resources/heritagebranch/heritage/hmstatementsofhi.pdf>.

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