

STATEMENT OF HERITAGE IMPACT

Proposed Alterations and Additions at
Northern Beaches Business Park
4-10 Inman Road,
Cromer



Job No. 9601
July 2022

Heritage 21
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.

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	Issued by
1	Draft report (D1) issued for comment.	19.07.2022	AP/DN	AP
2	Report (RI) issued.	21.07.2022	AP/DN	AP

1.0 INTRODUCTION

1.1 Background

This Statement of Heritage Impact ('SOHI' or 'report') has been prepared on behalf of Richard Crookes Construction who have been engaged by the owner of the site, in the context of an application to Northern Beaches Council pursuant to Section 4.55 of the *Environmental Planning & Assessment Act* 1979 ('the Act'), to modify an approved Development Application. The current application is regarding approved works at 4-10 Inman Road, Cromer ('the site'), which is subject to approved Development Application (DA2019/1346), for which consent was granted by Northern Beaches Council on 17/08/2020.

1.2 Site Identification

The subject site is located at 4-10 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/>)

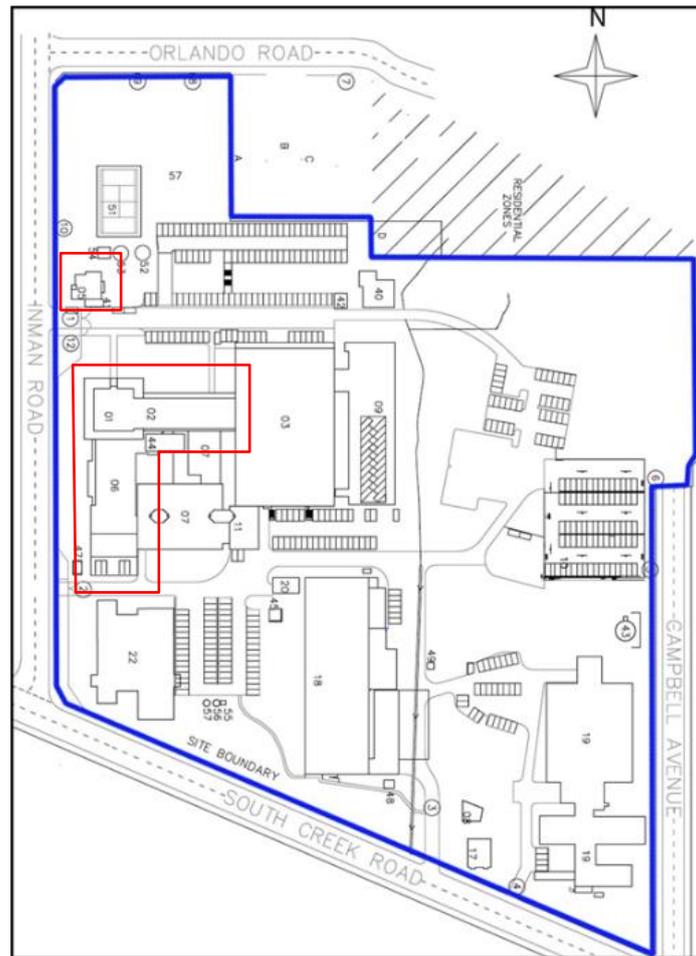


Figure 2. Existing Site Plan, identifying current building numbers. Buildings to be addressed in this report are outlined in red.

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'). However, the site is **not** listed on any other statutory or non-statutory lists or registers.

The details of the site's listings have been provided below:

Item name	Address	Significance	Item no
Roche Building	100 South Creek Road	Local	I52
Givaudan-Roure Office	96 South Creek Road	Local	I53
Trees	Campbell Avenue	Local	I38

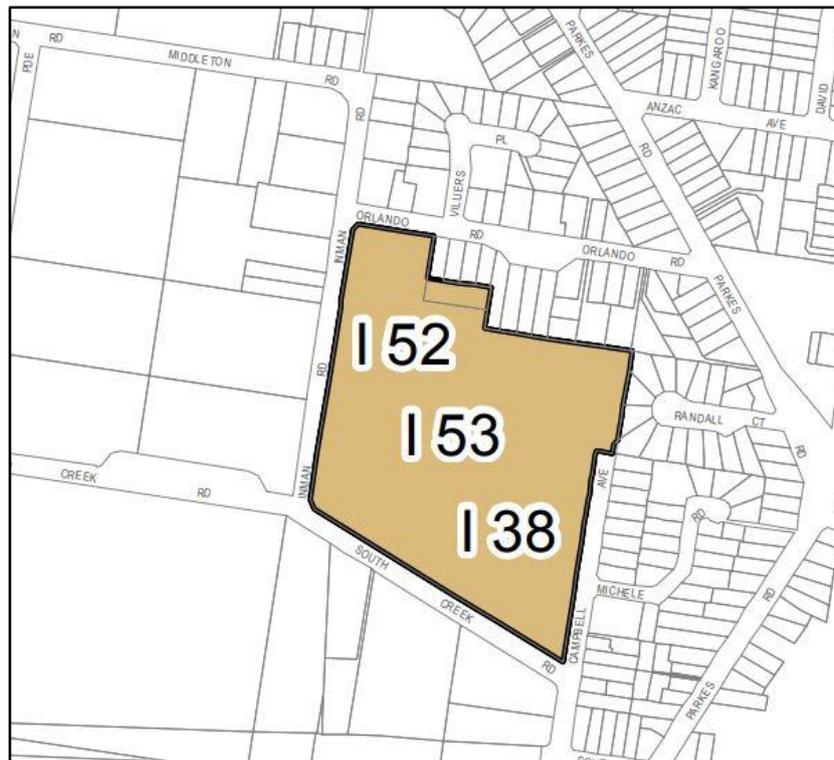


Figure 3. Detail from Heritage Map HER_009. The subject site is outlined in black and heritage items, are marked brown. (Source: NSW Legislation Online, <https://legislation.nsw.gov.au>)

The subject site is **not** located within the boundaries of any Heritage Conservation Area's ('HCA') under the WLEP 2011.

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, 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 ('Burra Charter').

1.6 Authors

This Statement of Heritage Impact ('SOHI' or 'report') has been prepared by Ankita Powale and Daniel Nabb, 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
1978	Warehouse addition to B10

Date	Event
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.

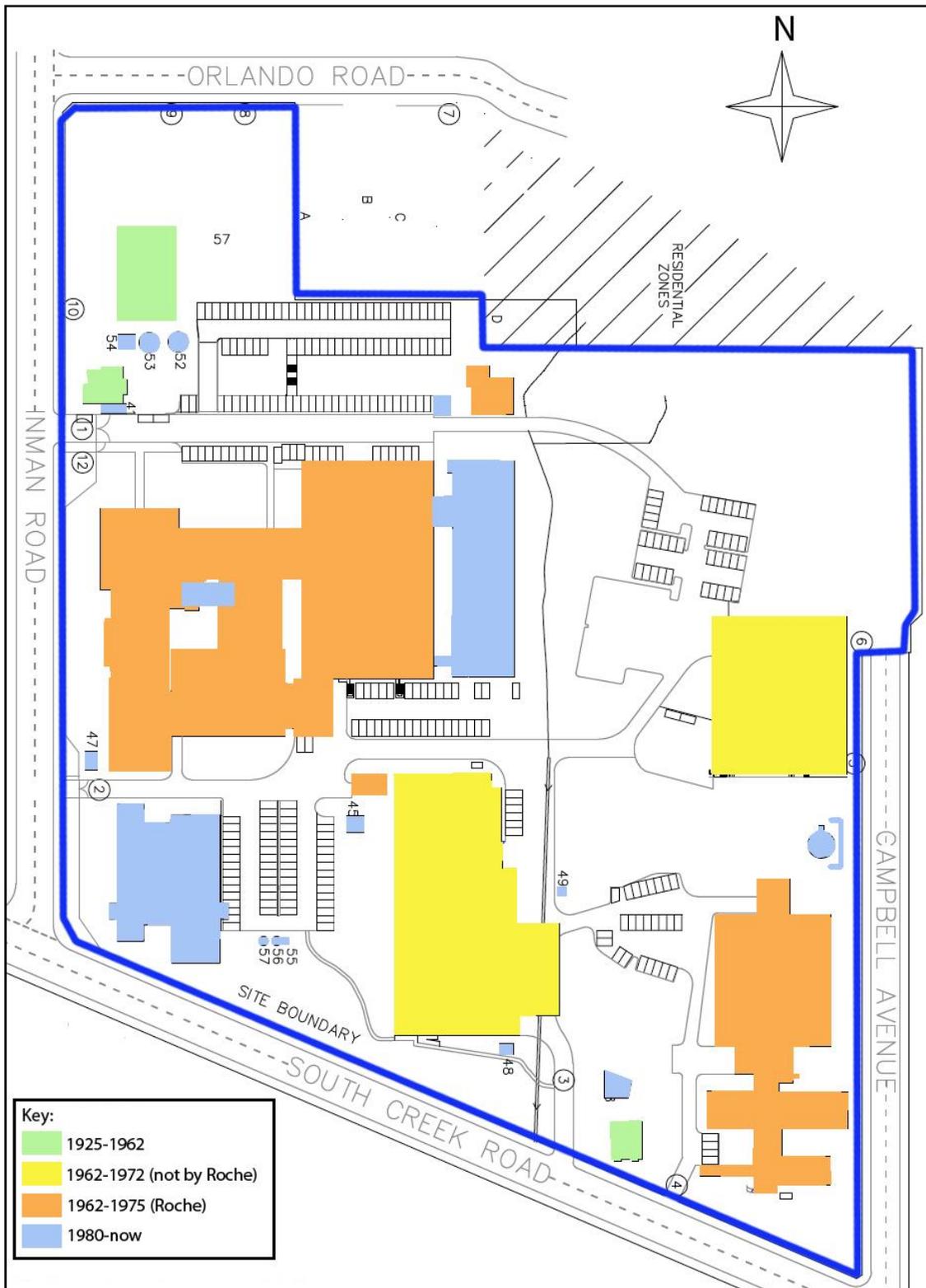


Figure 4: Current site diagram reflecting building phases.

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 bound by South Creek Road to the south and Inman Road to the west. The north-western corner of the site is bound 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 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 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, 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.

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.

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.

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

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

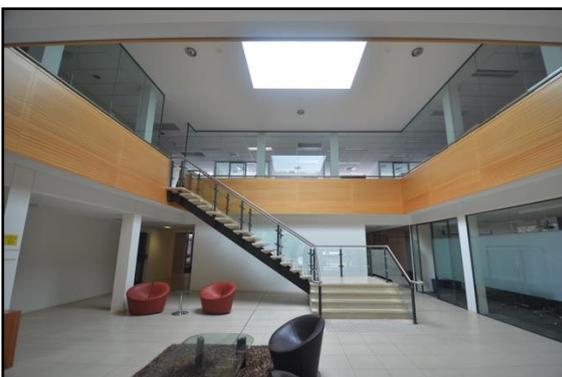


Figure 9. Internal view B1 – Reception area on Level 2 (Ground).²



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

² Level 1 does not exist in B1.



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

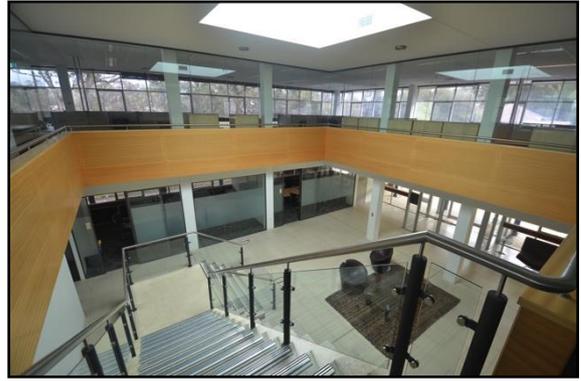


Figure 12. Internal view B1 – Level 3 / Mezzanine Level.



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



Figure 14. Internal view B2.



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

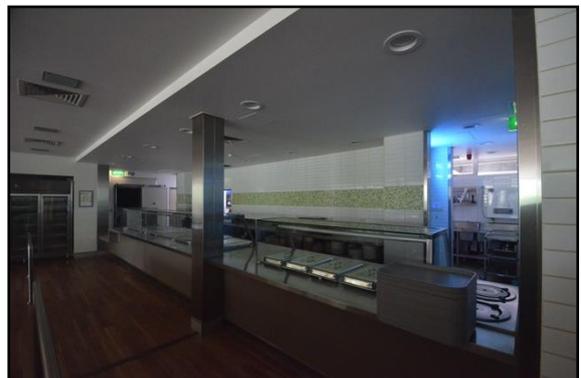


Figure 18. Internal view B6 – Kitchen; Level 1.



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

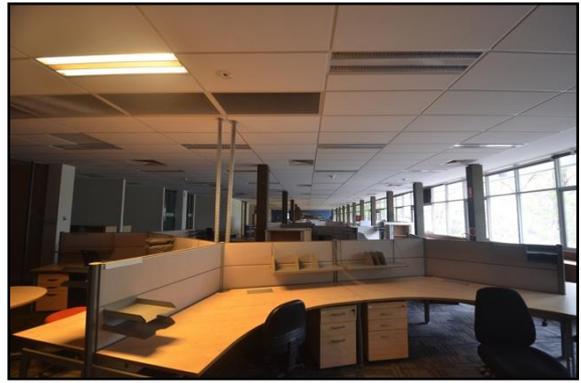


Figure 20. Internal view B6 – Offices; Level 2.

3.3 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 base, the cottage is accessible by a ramp to the eastern elevation and stairs to the western elevation. With a terracotta tile 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. The red arrows indicate the curved masonry walls.

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:

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:

- Alterations and additions within the interiors of cottage (B5) to convert it into a café; and
- Alterations and additions within the interiors of Buildings 01, 02, 06 to convert them into modern office spaces.

5.2 Drawings

Our assessment of the proposal is based on the following drawings by SBA Architects dated 06 July, 2022 and received by Heritage 21 on 08 July, 2022. These are reproduced below for reference only; the full set of drawings accompanying the development application should be referred to for any details.

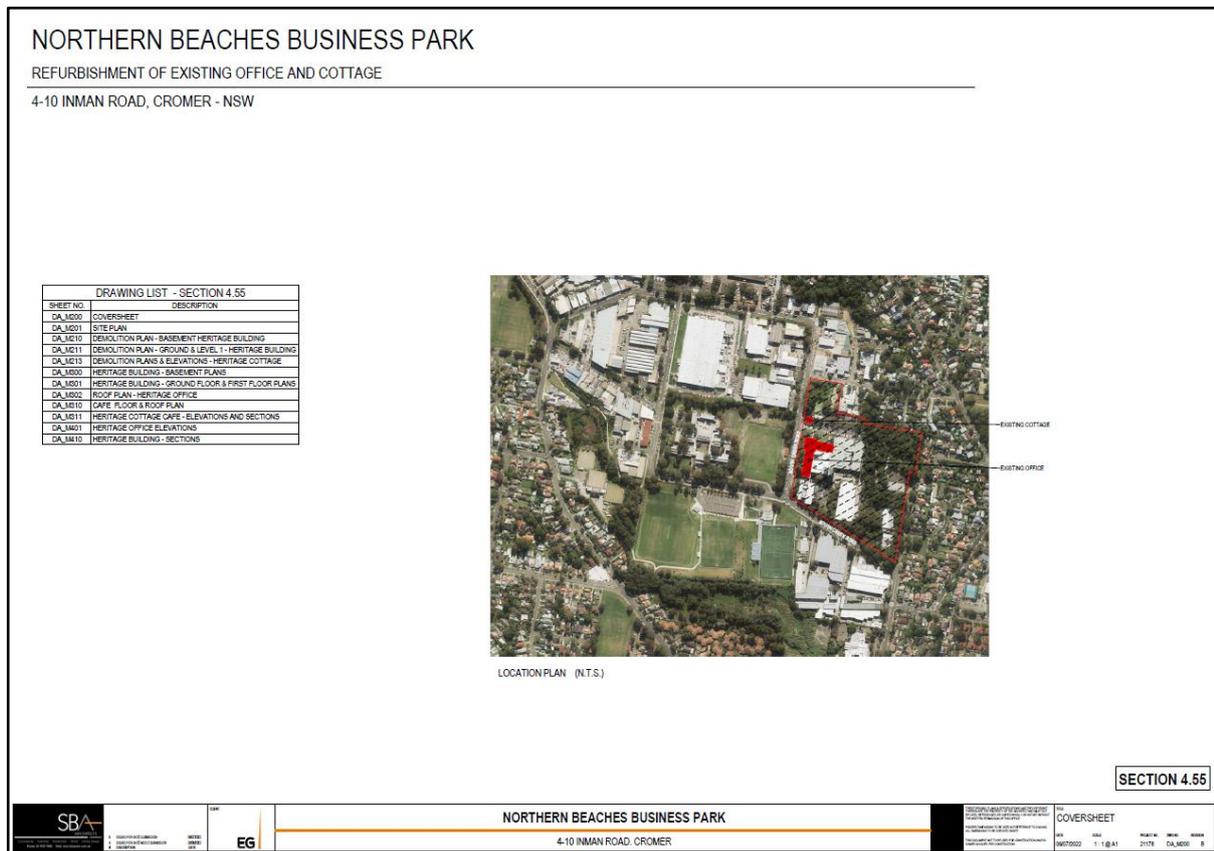


Figure 29. Coversheet

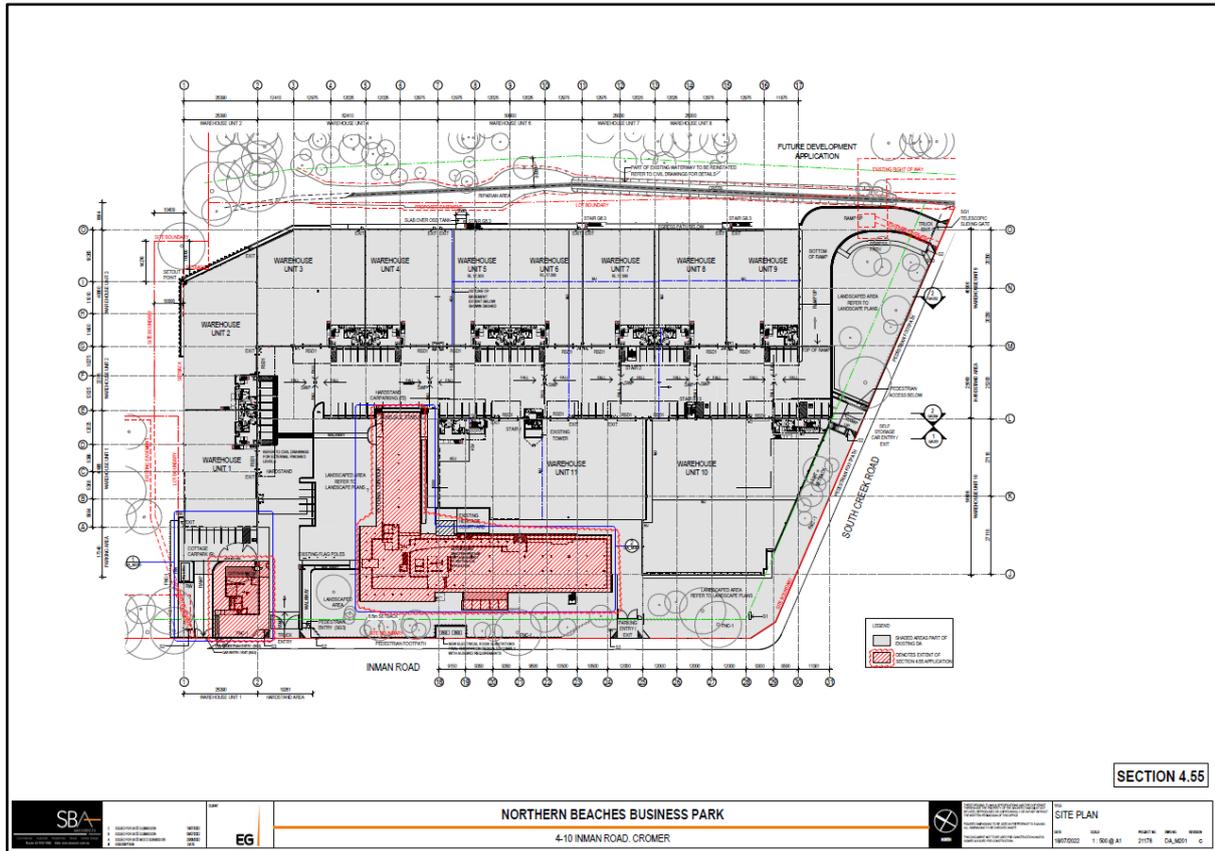


Figure 30. Site Plan

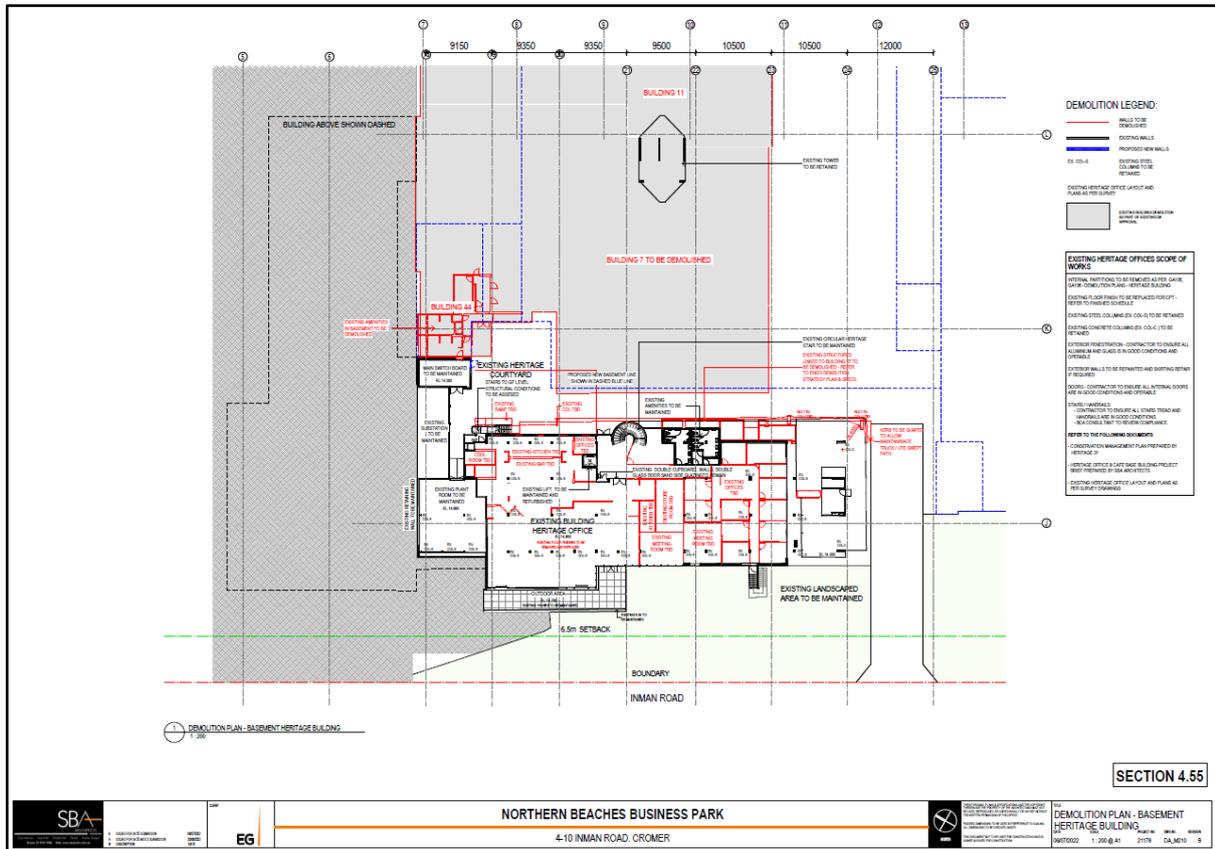


Figure 31. Demolition Plan – Basement Heritage Building

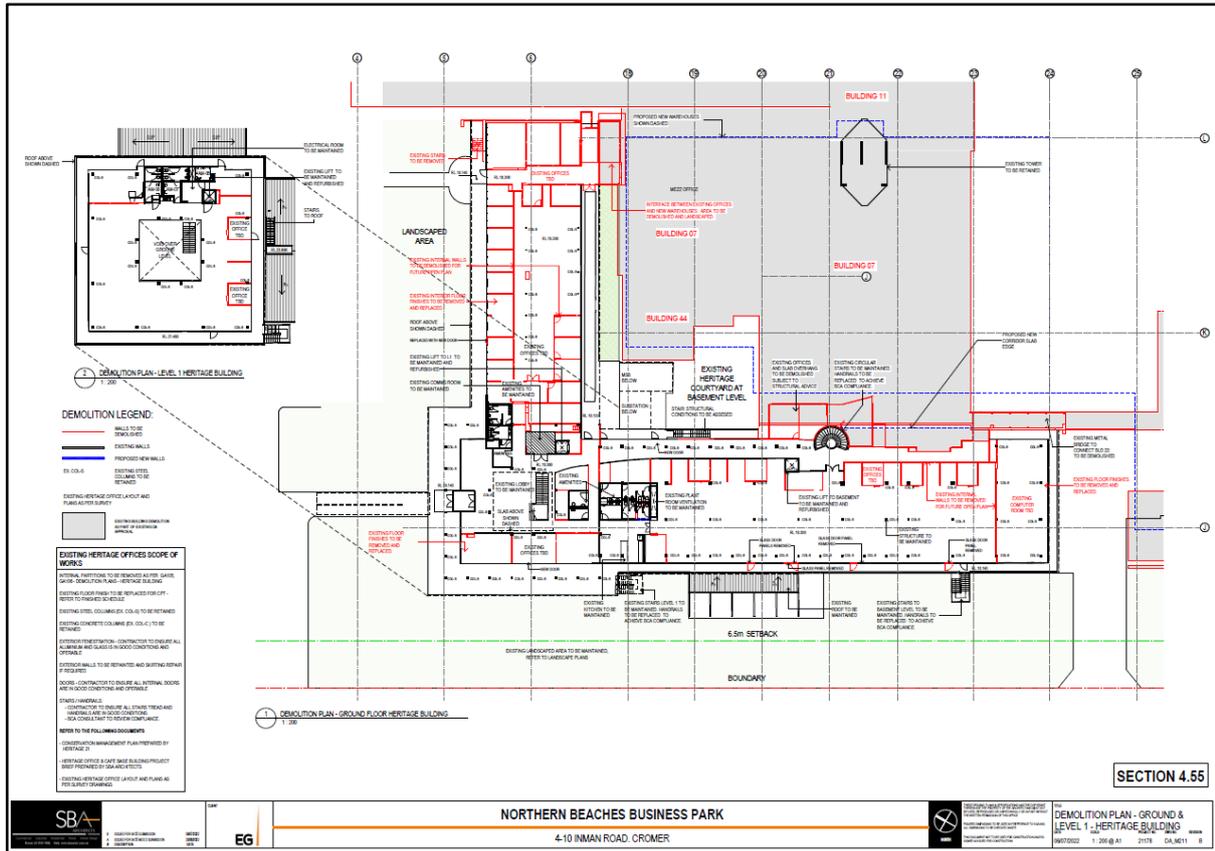


Figure 32. Demolition Plan – Ground & Level 1 Heritage Building

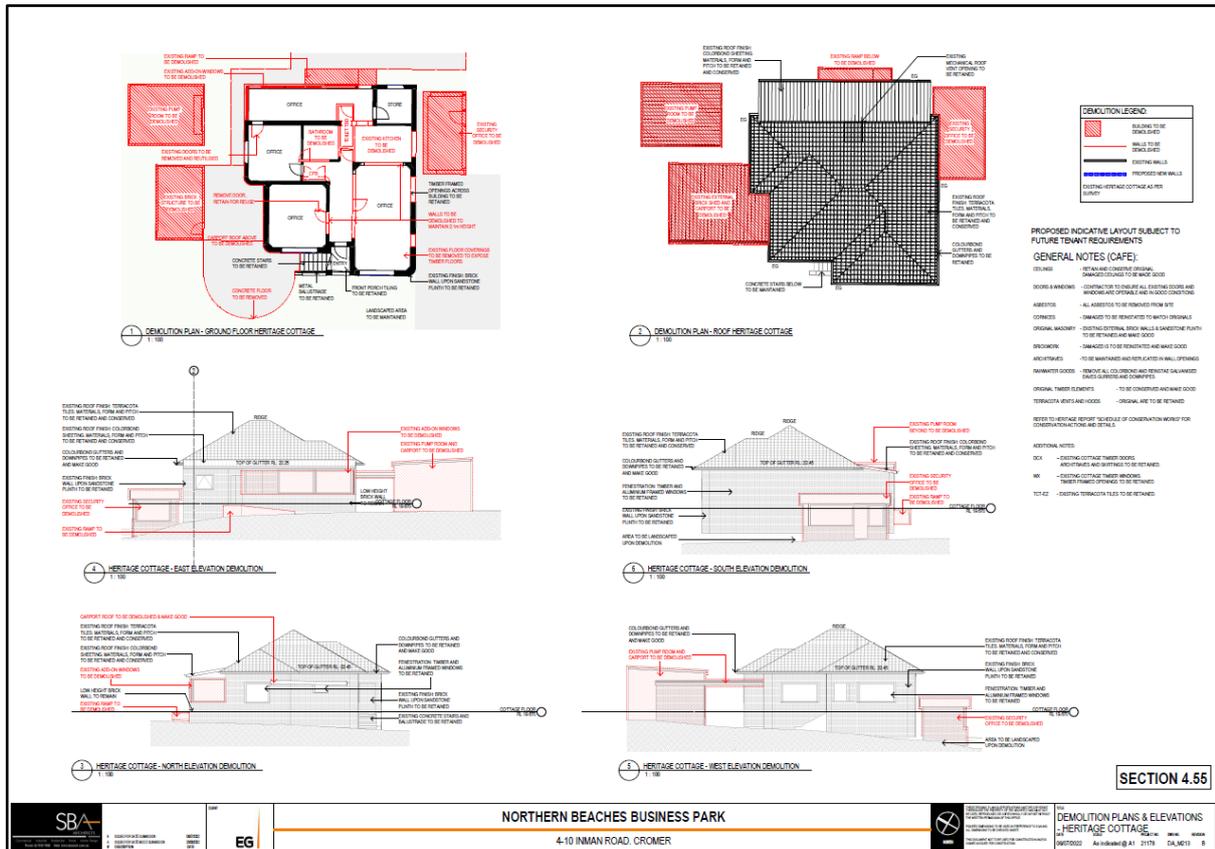


Figure 33. Demolition Plans & Elevations – Heritage Cottage

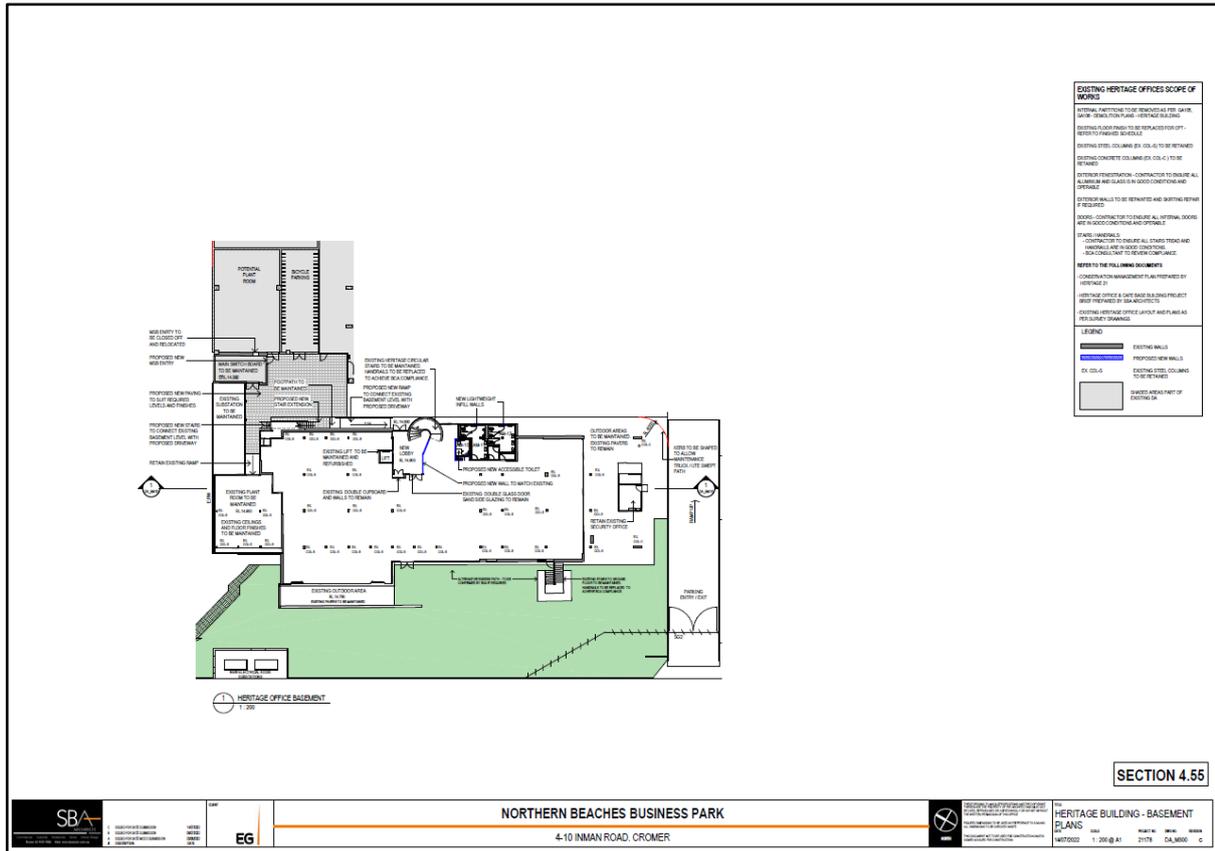


Figure 34. Heritage Cottage Building – Basement Plans

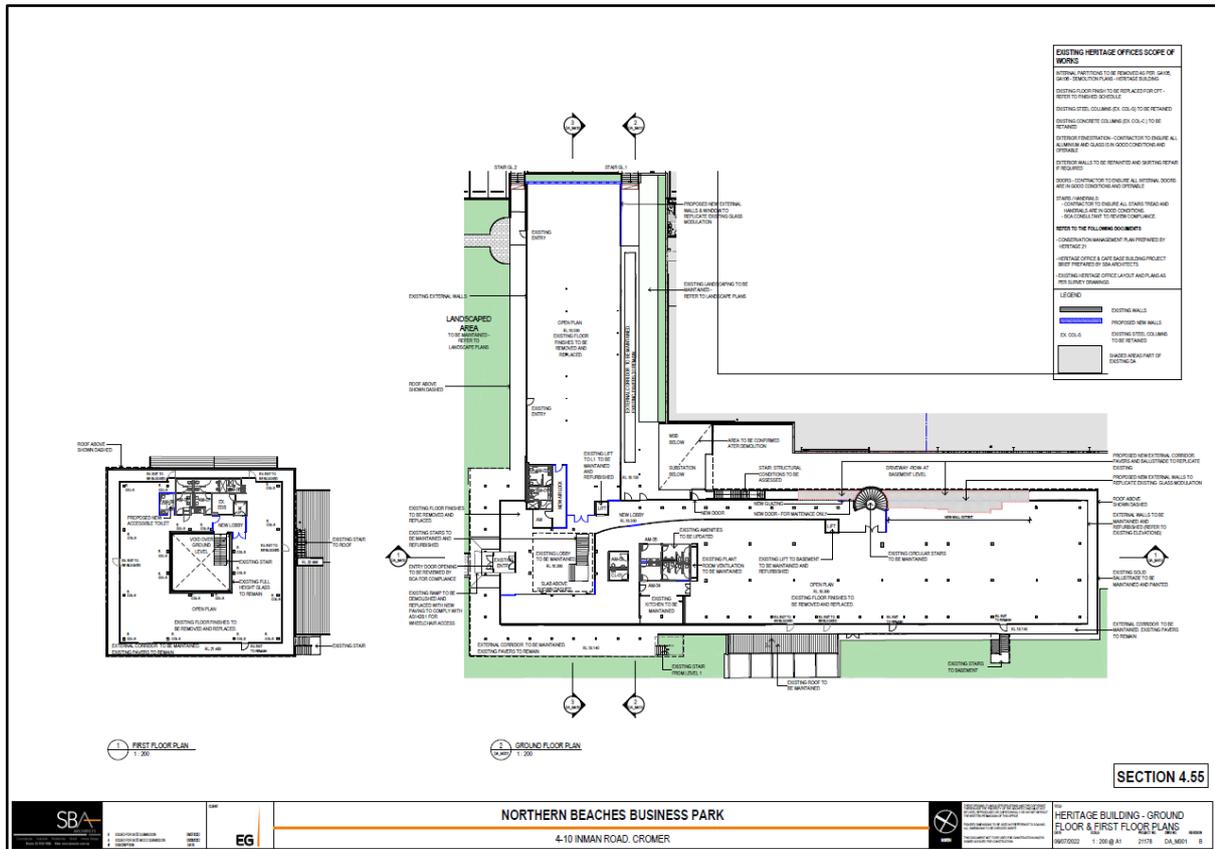


Figure 35. Heritage Building – Ground Floor & First Floor Plans

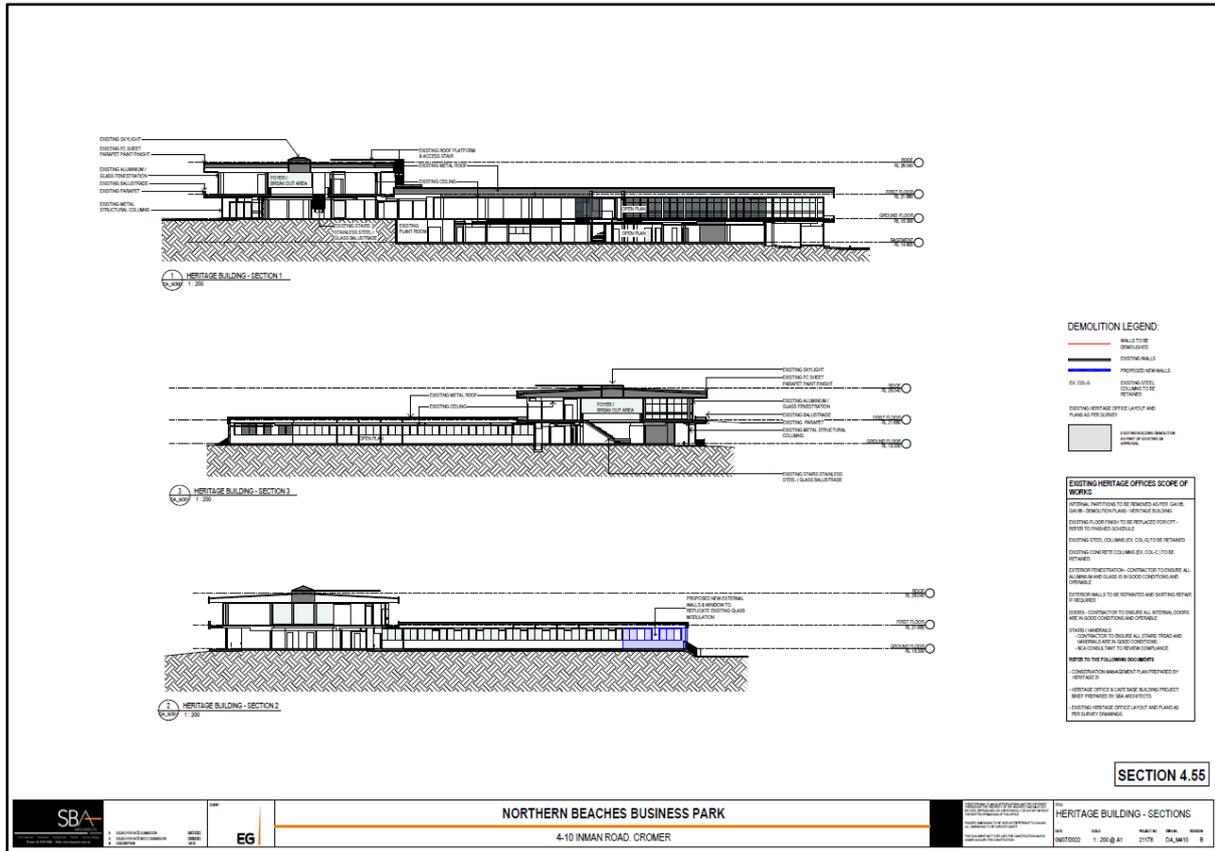


Figure 40. Heritage Building - Sections

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) Heritage conservation management plans
- (10) Conservation incentives

6.1.2 Warringah Development Control Plan 2011 ('WDCP')

Our assessment of heritage impact also considers the heritage-related sections of the 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 Conservation Management Plan ('CMP')

The following sections of the Conservation Management Plan 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 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.

Major partial demolition (including internal elements)

- *Is the demolition essential for the heritage item to function?*
- *Are particular features of the item affected by the demolition (e.g. fireplaces in buildings)?*
- *Is the detailing of the partial demolition sympathetic to the heritage significance of the item (e.g. creating large square openings in internal walls rather than removing the wall altogether)?*
- *If the partial demolition is a result of the condition of the fabric, is it certain that the fabric cannot be repaired?*

Major additions (see also major 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 not, why not?*
- *Will the additions tend to visually dominate the heritage item?*
- *Are the additions 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)?*

New services (e.g. air conditioning, plumbing)

- *How has the impact of the new services on the heritage significance of the item been minimised?*
- *Are any of the existing services of heritage significance? In what way? Are they affected by the new work?*
- *Has the advice of a conservation consultant (e.g. architect) been sought? Has the consultant's advice been implemented?*
- *Are any known or potential archaeological deposits (underground and under floor) affected by the proposed new services?*

6.2 Heritage Impact Assessment

Below we assess the impact that the proposed development would have upon the subject site and the heritage items within 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).

6.2.1 Summary

The subject site of the former Rocher Complex located at 4-10 Inman Road, Cromer is a heritage listed site under Schedule 5 of the Warringah Local Environmental 2011. The subject site consists of multiple buildings located within the complex and had a development application – DA2019/1346 for which consent was granted by Northern Beaches Council on 17/08/2020. This application is for a Section 4.55 to modify the approved development consent. The heritage cottage (B5) and Buildings 01, 02 and 06 are the main buildings subject to this application.

As a part of the 2019 development application, consent was received from Council for the change of use of the heritage cottage (B5) as a café. The proposed works to the heritage listed cottage would consist of alterations and additions within the interiors of the cottage to convert it into a café. The demolition works would include the removal of later addition fabric which is intrusive or of little heritage significance. The works would include the removal of the later addition suspended ceilings and carpeted flooring. The proposal would retain the original timber flooring below the carpeted flooring. The proposed development would also include the removal of the intrusive aluminium windows of the enclosed lean-to addition along the eastern façade. The aluminium windows would be replaced with timber bi-fold windows. These would be complementary to the original timber windows of the heritage cottage, improving its presentation within the former Roche complex. The internal alterations would also include the partial demolition of the walls to accommodate the contemporary needs of the café. The demolition of the internal walls would be limited to the opening height of 2.1m and would retain nibs of 450mm to ensure that the original layout of the heritage cottage remains legible. The retention of the nibs and spandrels of the original walls would ensure that the cottage retains the legibility of its original plan. The works would retain the existing internal timber doors and architraves and would conserve the timber flooring within the interiors ensuring that the significance of the cottage is maintained. The demolition within the interiors would be limited to later addition kitchen and bathroom ensuring that the works would not impact any heritage fabric. The main alterations within the interiors of the cottage includes the conversion of one of the existing rooms into a toilet. The works would include the removal of the timber floorboards would retain the original timber joists and structure of the flooring. The new tiling of the bathroom would be fixed to 50mm CFC sheeting set on top of the timber joists ensuring the works would be all reversible. As such the works would be limited to the interiors of the cottage and would be minimal. These works would not alter the form, bulk or scale of the cottage and would not engender a negative impact on the heritage significance of the building.

The works to the exteriors of the cottage include the demolition of the intrusive concrete ramp along the eastern façade, demolition of the later addition carport, pump room and security office. These structures are intrusive and negatively impact the presentation of the heritage cottage. The demolition of these structures would aid in improving the landscape surrounding the heritage cottage by the introduction of a timber ramp and stairs and landscaping works. These would improve the general setting of the heritage cottage improving its presentation from the public domain.

The works to the heritage cottage would include demolition works within the interiors of Building 01 and 02 which are the heritage offices. The demolitions work would include the removal of all later addition fabric of little significance including light weight partition walls, suspended ceilings tiles, carpeted and tiled flooring and later addition fixtures and fittings. Buildings 01 and 02 have undergone extensive alterations and additions in 1997 for the internal partitions and were renovated in 2006 and 2008. As such the internal finishes of the building have been altered and are not original. The works would not impact the walls or the concrete structure of the buildings which are of high significance. The works would retain the terrazzo stairs in Building in 01 and the curved staircase in Building 06 of high significance. The proposal would not include any alterations to fabric of high significance, retaining the external walls as well as the curtain wall glazing of the heritage offices. The new wall and windows along the eastern elevation of Building 06 would follow the existing façade modulation of the heritage building and would ensure that the new design fits within heritage context. The works would retain the heritage courtyard and ensure the works would not impact any heritage fabric. As such, the works would not negatively impact the heritage offices and would maintain the original form and scale of the building on site. Heritage 21 is confident that the proposed works would maintain building and areas of high significance within the Roche complex and would not negatively impact the significance of the subject site.

6.2.2 Impact Assessment against the WLEP 2011

The statutory heritage conservation requirements contained in Section 5.10 of the Warringah Council 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 Warringah LWEF 2011. 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 Section 4.55 Application is lodged to Council to gain consent for the works proposed at the subject site which is listed under Schedule 5 of the Warringah LEP 2011.

(4) Effect of proposed development on heritage significance	This Statement of Heritage Impact accompanies the Section 4.55 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 subject site.
(5) Heritage assessment	

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

Heritage 21 prepared a Conservation Management Plan for the subject site in May 2019 to guide any future works at the site.

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"> • <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 proposal would retain the Buildings 05 – heritage cottage and the Buildings 01,02 and 06 – heritage offices. All alterations and additions would be limited to the interiors of the heritage buildings in already altered areas, ensuring that the works would not detract the significance of the subject site.</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 been a part of the design development and provided heritage advice to ensure that the works are limited to fabric of little significance. The advice has ensured that all works are complementary to the significance of the heritage buildings and would retain the fabric of high significance like the staircases in the heritage office and the external walls, structure and curtain wall glazing of the heritage offices.</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 5.1 – Proposed Alterations to Fabric of High and Moderate Significance</i> <i>All fabric of either moderate or high significance ought to be physically retained in situ. However, where such fabric cannot be retained, steps should be taken to</i></p>	<p>The proposed works would retain fabric of high significance within the heritage cottage. The demolition works to the exteriors are limited to intrusive structures and structures of little significance like the car port, security cabin or the pump house.</p>

<p><i>adequately interpret the identified heritage significance of the item by way of an interpretation strategy and plan. All fabric that is to be demolished is to be preceded with a comprehensive photographic archival record in accordance with OEH guidelines. Any new work proposed to these highly significant spaces and elements must be sympathetic to the original fabric and any modifications to such fabric is to be subject to a formal Statement of Heritage Impact in accordance with the Heritage Branch guidelines, and where applicable photographic archival recording.</i></p>	<p>The demolition of these structures of little significance would improve the setting of the heritage cottage ensuring its presentation within the public domain. The partial demolition of internal walls within the cottage would maintain ribs and spandrels ensuring that the original layout of the cottage remains legible. The works to convert one of the rooms into a bathroom would be reversible, ensuring that there is minimal impact on the significance of the heritage cottage.</p> <p>Works to the heritage offices would be limited to removal of all later addition fabric of little significance. The works would retain the terrazzo stairs and curved stairs which are of high significance. The works would not alter the form, scale or bulk of the heritage buildings ensuring that the buildings of high heritage significance is maintained.</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 proposed to such spaces identified as possessing little significance should, wherever possible, be sympathetic to the original fabric and spaces.</i> <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>The buildings 01, 02, 06 - heritage offices have undergone multiple alterations over the years leading to the original internal configurations and finishes. 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>
<p><i>Policy 5.3 – Proposed Alterations to Fabric of Intrusive Significance</i> <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> <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> <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 removal of existing fabric would not detract from the significance of the subject site. Due to the significant modifications that have occurred within the subject site, in Heritage 21’s opinion the proposed development would improve the presentation of the subject site to the public domain and would not detract from the significance of the subject site.</p>

<p><i>Policy 8.1 – External Views</i> Views to the significant buildings from the surrounding streets should be maintained, and enhanced where possible, by the careful management of the design of any new structures and plantings.</p>	<p>The proposal would be limited to alterations to internal areas of the heritage buildings. The works would not alter the bulk or the scale of the buildings. The demolition of the intrusive structures surrounding the heritage cottage and the improvement of the landscaping would rather improve the external views to the heritage buildings from the public domain.</p>
<p><i>Policy 8.2 – Internal Views</i> Views of the significant buildings from within the site should be maintained, and enhanced where possible, by the careful management of the design of any new structures and plantings.</p>	<p>The proposed works would be limited to the interiors of the heritage buildings and the alterations would be to fabric of little significance. 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 6.1.4, 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.

Major partial demolition (including internal elements)	
<p><i>Is the demolition essential for the heritage item to function?</i></p>	<p>The proposed demolition is not essential for the heritage buildings to function. However, the demolition would be limited to the later addition fabric and would not impact any significance fabric. The internal demolition within the heritage buildings would ensure the upgradation of the buildings for contemporary needs and requirements ensuring that the heritage buildings are retained as a part of the new development.</p>
<p><i>Are particular features of the item affected by the demolition (e.g. fireplaces in buildings)?</i></p>	<p>The demolition within the interiors of the heritage offices would not impact any heritage fabric. The works would be limited to later addition suspended ceiling tiles, light weight partition walls and carpeted and tiled flooring, all of which are not original. As such the proposed demolition would retain the external walls, curtain wall glazing and concrete structure of buildings 01,02 and 06. The demolition within the heritage cottage is limited to partial demolition of the internal walls which would retain the nibs and spandrels, ensuring that the original layout of the cottage remains legible. The introduction of the new bathroom within the cottage would retain the timber joists of the floor structure and the new finishes would be fixed to CFC sheeting, ensuring the works are all reversible and the cottage may be reinstated back to</p>

	its original form at a later stage. As such, the proposed works would not engender a negative impact on the significance of the subject site.
<i>Is the detailing of the partial demolition sympathetic to the heritage significance of the item (e.g. creating large square openings in internal walls rather than removing the wall altogether)?</i>	As mentioned above to mitigate the demolition of the internal walls in the cottage, the demolition would introduce large square openings in the walls to a height of 2.1m only. The demolition works would maintain nibs and spandrels ensuring that the original room layout of the cottage remains legible.
<i>If the partial demolition is a result of the condition of the fabric, is it certain that the fabric cannot be repaired?</i>	The partial demolition within the interiors of the heritage cottage (B5) and Buildings 01, 02 and 06 is not a condition of the fabric. The demolition is limited to later addition fabric of little significance, and it is required to upgrade these buildings for the adaptive reuse and to suit the contemporary needs. The removal of later addition fabric or fabric of little significance would engender a neutral impact on the significance of the heritage buildings.
Major additions (see also major partial demolition)	
<i>How is the impact of the addition on the heritage significance of the item to be minimised?</i>	<p>The proposed additions are limited within the existing envelopes of the heritage buildings. The works would not involve additions which would alter the scale or bulk of the existing buildings ensuring that the views to the buildings from the public domain are maintained. The works to the eastern façade of the heritage cottage include the demolition of the intrusive concrete ramp and stairs and the removal of the intrusive aluminium windows. The works would replace the ramp with a timber deck and stairs and the windows would be replaced with timber bi-fold windows, improving the presentation of the heritage cottage.</p> <p>The works to the heritage offices would maintain the buildings and the additions to the eastern façade of Building 06 would include the introduction of windows following the existing façade modulation, ensuring that the new works are complementary to the heritage buildings and would not engender a negative impact on the significance of the subject site.</p>
<i>Can the additional area be located within an existing structure? If not, why not?</i>	All the works would be limited to the existing building envelope of the heritage cottage and the heritage offices. The works would not alter the existing form, bulk or scale of the heritage buildings. The works do not include addition of any additional new areas.
<i>Will the additions tend to visually dominate the heritage item?</i>	The alterations and additions would be largely limited to the interiors of the heritage buildings. The works would include the demolition of intrusive structures and structures of little significance and additions would not overwhelm the existing heritage buildings. The proposed works would rather improve the presentation of the heritage buildings within the complex and the external streetscapes.

<p><i>Are the additions sited on any known, or potentially significant archaeological deposits? If so, have alternative positions for the additions been considered?</i></p>	<p>An archaeological assessment is beyond the scope of this report. In saying so, the works are limited to alterations and additions within the interiors of the building consisting fabric of little significance and would not involve any excavations.</p>
<p>New services (e.g. air condition, plumbing)</p>	
<p><i>How has the impact of the new services on the heritage significance of the item been minimised?</i></p>	<p>The proposal would include the introduction of a new toilet within the interiors of the heritage cottage. The works would involve the removal of the timber floorboards but would retain the original timber joists of the floor structure. In order to mitigate the instruction of this new bathroom Heritage 21 has recommended that the new finishes be installed against CFC sheeting ensuring that the works are all reversible and the cottage may be reinstated back to its original form at a later stage. As such, Heritage 21 is confident that the proposed works would not engender a negative impact on the significance of the heritage cottage.</p>
<p><i>Are any of the existing services of heritage significance? In what way? Are they affected by the new work?</i></p>	<p>The existing services within the heritage buildings have been altered over the years and are not original. The proposed works would not impact any heritage significant fabric or services.</p>
<p><i>Has the advice of a conservation consultant (e.g. architect) been sought? Has the consultant's advice been implemented?</i></p>	<p>Heritage 21 has been a part of the design development and provided advice in terms of ensuring that the fabric of high heritage significance within the interiors of the heritage buildings is retained. The introduction of new services in the heritage cottage have been designed in such a way that all works are reversible and would not engender a negative impact on the heritage significance of the subject site.</p>
<p><i>Are any known or potential archaeological deposits (underground and under floor) affected by the proposed new services?</i></p>	<p>An archaeological assessment is beyond the scope of this report. In saying so, the works are limited to alterations and additions within the interiors of the building and would not involve any excavations.</p>

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 subject site for industrial and office purposes;
- The proposed development would not alter the historic subdivision pattern in the Cromer locality;
- The proposal would require and result in the conservation of the most significant buildings on-site, being Buildings 01, 02, 06 and the hexagonal tower;
- The proposed works would be limited to later addition fabric of little significance and would not impact any heritage significant fabric;
- The proposed works would be limited to the interiors of the heritage buildings and would not alter the form, scale or bulk of the heritage buildings;
- The proposed works would demolish the intrusive structures surrounding the heritage cottage and improve the setting and presentation of the cottage;
- The proposed retention of Buildings 01, 02, 06 and the hexagonal tower would maintain the existing presentation of the Former Roche Facility to Inman Road and the immediate area; and
- The proposed retention of existing soft landscaping and the introduction of additional soft landscaping would maintain the industrial park setting and improve the existing views to the subject site.

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 the buildings of high heritage significance including Building 01, 02, 06 and the heritage cottage within the former Roche complex. The neutral impacts of the proposal have been addressed above in Section 7.1.1.

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>.

7.1.3 Sympathetic alternative solutions which have been considered and discounted

Heritage 21 provided heritage advice to the applicant which has been incorporated in the final proposal as described in Section 5.0 and which includes:

- The retention of fabric of high heritage significance within the interiors of the heritage offices – Buildings 1, 02 and 06 including the retention of terrazzo stairs, curved stairs along the eastern elevation, external walls, concrete structure of the buildings and the original curtain all glazing;
- The works have been limited to the internal areas of little significance which have been previously altered/ modified;
- The demolition of the internal walls within the heritage cottage would retain nibs and spandrels at 2.1m height level to ensure that the original room layout of the cottage remains legible; and
- The finishes of the new bathroom in the cottage would be fixed to CFC sheeting ensuring that all the works are reversible and would not impact any heritage significant fabric.

No solutions of greater sympathy with the significance of the subject site, heritage conservation area or heritage items in the vicinity have been discounted to our knowledge.

7.2 General Conclusion

Heritage 21 is therefore confident that the proposed development complies with pertinent heritage controls and would engender a neutral impact on the heritage significance of the subject site, the XX heritage conservation area and/or heritage items in the vicinity. We therefore recommend that Northern Beaches Council view the application favourably on heritage grounds.

8.0 SOURCES

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