

# STATEMENT OF HERITAGE IMPACT

Proposed development at  
100 South Creek Road,  
CROMER



Job No. 8185  
October 2019

**Heritage 21**  
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:** View to the primary façade of the subject site at 100 South Creek Road, Cromer.  
(Source: Heritage 21, 07 February 2018).

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

Issue	Description	Date	Written by	Reviewed by	Issued by
1	Draft report (D1) issued for comment.	06.05.19	LS	PR	LS
2	Draft report (D2) issued for comment.	15.05.19	LS	-	LS
3	Final report issued (RI).	17.05.19	LS	PR	LS
4	Report (RI2) issued (Job 8438).	011119	LS	--	KM

## 1.0 INTRODUCTION

### 1.1 Background

This Statement of Heritage Impact ('SoHI' or 'report') has been prepared on behalf of EG Funds Management in the context of a development application for modifications to the place, including the construction of 11 warehouses and a basement carpark.

### 1.2 Site Identification

The subject site is located at 100 South Creek Road, Cromer, also referred to in this report as the 'Former Roche Site', '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).



**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/.](http://maps.six.nsw.gov.au/))

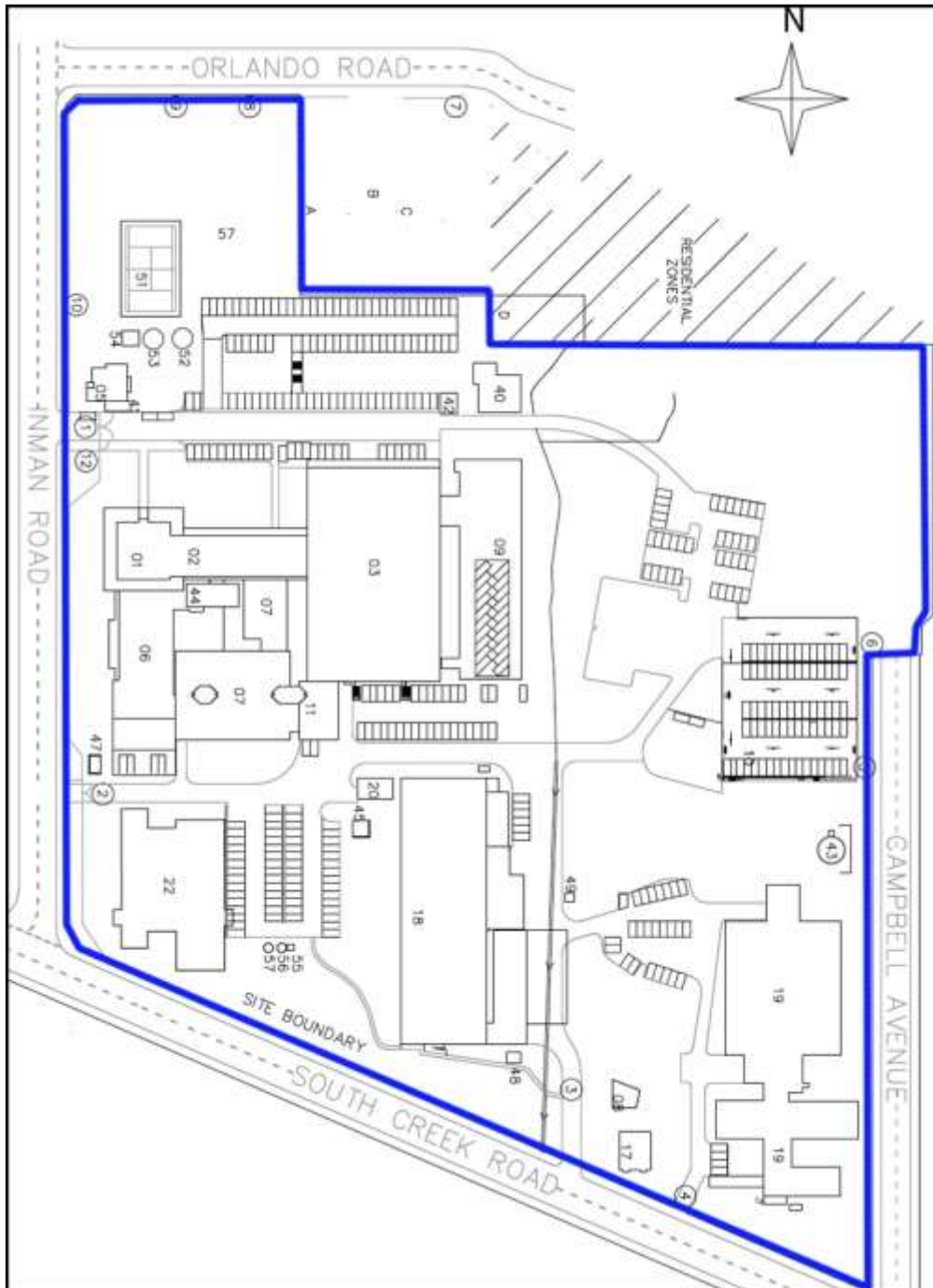


Figure 2. Existing Site Plan, identifying current building numbers.

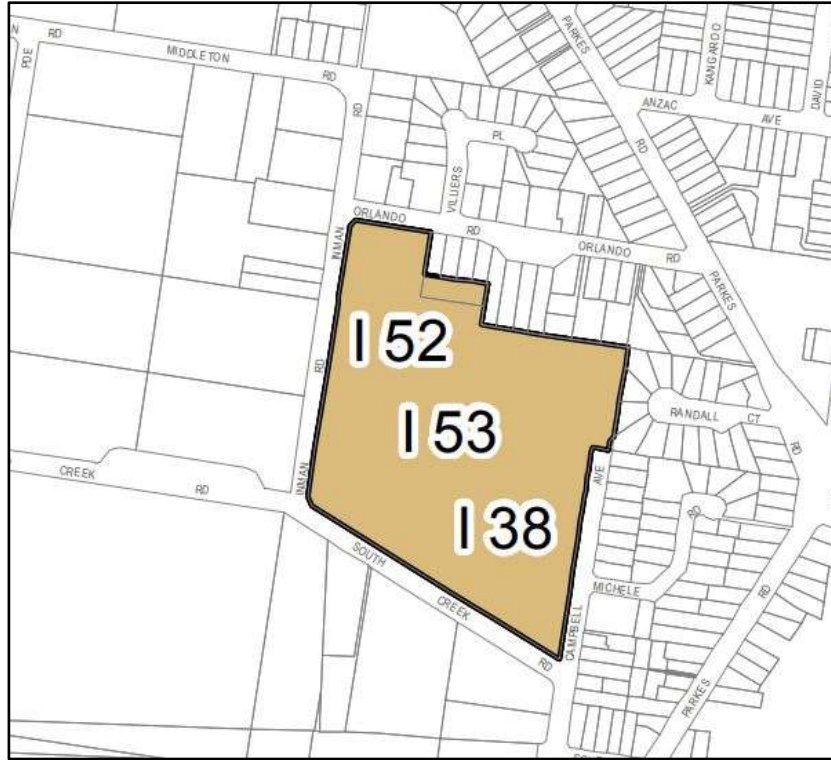
### 1.3 Heritage Context

#### 1.3.1 Heritage Status

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>)

### 1.3.2 Heritage Conservation Areas

As depicted in Figure 2 above, the site is **not** located within the boundaries of any Heritage Conservation Areas (‘HCA’s), listed under Schedule 5 of the WLEP 2011.

### 1.3.3 Heritage Items in the Vicinity

As shown in Figure 2 above, the site is **not** situated within the general vicinity of any items of environmental heritage listed under Schedule 5 of the WLEP 2011.



## 1.4 Purpose

The subject site comprises of three items of environmental heritage, all of which are 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 items and, also, to assess the extent (whether negative, neutral or positive) to which the proposal would impact the heritage significance of those heritage items. 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 Lauren Schutz, Heritage Consultant of Heritage 21. Its findings have been reviewed and endorsed by Paul Rappoport, Director of Heritage 21.

## 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.

- 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 DEVELOPMENT

The following historical analysis of the subject site and the local area is extracted from the Conservation Management Plan produced by Heritage 21 for the subject site, in May 2019.

### 2.1 Local History

The Cromer area is within Gayamaygal land. The Gayamaygal clan were Dharug language speakers and lived in the Manly Cove area. Following European arrival, early land grants in the Dee Why area were made to John Ramsay, William Cossar and James Jenkins. In 1818, Ramsay was granted 410 acres stretching from Long Reef to Narrabeen Lagoon. William Cossar received 500 acres stretching from Collaroy to Dee Why Lagoon in 1819, while James Jenkins was granted 200 acres, stretching from Dee Why Lagoon to Pacific Parade in the 1830's. These three grants comprise the area of land stretching south from Narrabeen Lagoon to Pacific Parade, Dee Why, all of which was eventually acquired by ex-convict James Jenkins.

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

In addition to being a thriving residential and commercial centre, modern Dee Why is also a centre for industrial development in the Warringah district.

Cromer used to be known as 'Dee Why West'. The name Cromer originates from '*Cromer Cottage*', which in the late 1800s was located south-west of what is now the sixth tee on Cromer Golf Course. Cromer Cottage was named after the seaside town of Cromer in Norfolk, England.<sup>1</sup> Warringah Shire Council officially renamed Dee Why West 'Cromer' in 1964.

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<sup>1</sup> Childs J., Cromer, 2008; Hayman H.F., The Early History of Cromer, p1.

## 2.2 History of the Site

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
1980	Construction of B41

Date	Event
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.

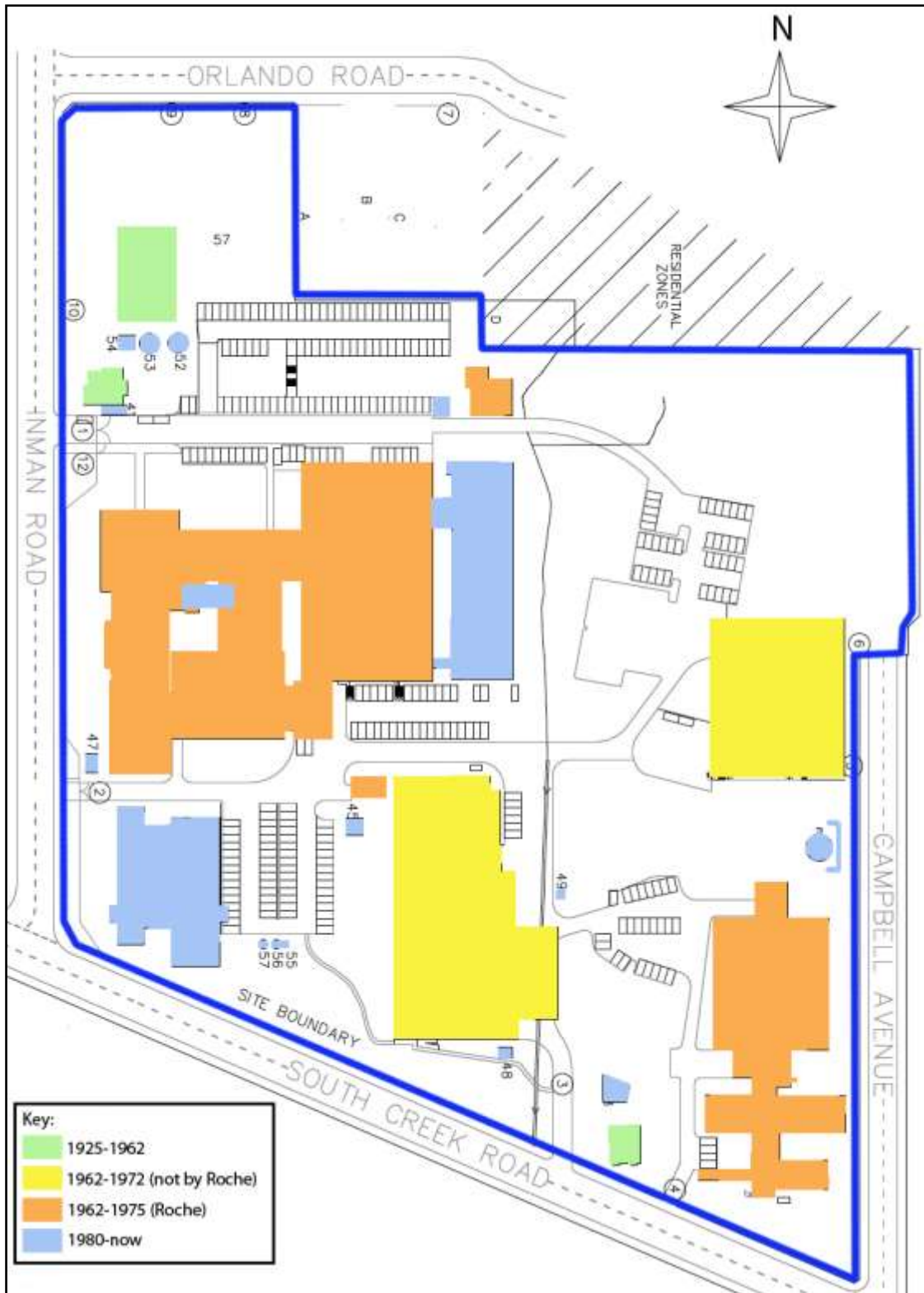


Figure 4: Current site diagram reflecting building phases.

## 3.0 PHYSICAL EVIDENCE

### 3.1 Locality

The suburb of Cromer, located approximately 20 kilometres north-east of the Sydney CBD, is considered part of the Northern Beaches region. It is an industrial area with a population as of the last census of around 7,600.

### 3.2 Streetscape

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).

### 3.3 Views

The principal views – from the public domain – towards the Former Roche Complex are at street level from Inman Road and South Creek Road. Views towards the site are predominately obstructed by mature plantings.

### 3.4 The Existing Site

The site has been significantly developed and includes a variety of buildings and structures. Seventeen buildings exist: B1, B2, B3, B5, B6, B7, B8, B9, B10, B11, B17, B18, B19, B20, B22, B40, and B41. Fourteen structures (including water tanks, tennis court and small structures) exist: B42, B43, B44, B45, B47, B48, B49, B51, B52, B53, B54, B55, B56 & B57.

A variety of buildings occupy the site, ranging in age from the 1920s (B17) through to 2006 (B22) and are constructed in a variety of styles as per their era of construction. Most of the buildings date from the Roche occupation of the site, with the majority of buildings constructed during the 1960s and 1970s. The main Roche complex included Building 1, 2 and 3 (constructed in 1964), Building 6 (constructed in 1969) and Building 7 and 11 (constructed in 1973). Building 7 and 11, originally named the '*Research Institute of Marine Pharmacology*' include two hexagonal towers, with the western tower lower than the eastern tower. The eastern tower is located immediately adjacent Building 11 and incorporated the '*Roche*' advertising sign from its construction until recently, when the site was sold by Roche.<sup>2</sup> The height of Building 11 and the adjacent hexagonal tower provide the site with a landmark aspect. Views to the site are characterised by these features, with the main views to these towers from Inman Road and South Creek Road.

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<sup>2</sup> DA2017/0948 Notice of Determination, Northern Beaches Council, dated 10 January 2018.



**Figure 5:** Looking south from Orlando Road, showing the tower. (Source: *Heritage 21*, September 2018)



**Figure 6:** Looking south-east from Inman Road, showing the tower. (Source: *Heritage 21*, September 2018)



**Figure 7:** Looking north from South Creek Road, showing the tower and B11. (Source: *Heritage 21*, September 2018)



**Figure 8:** Looking west from Campbell Avenue, showing the tower and B11. (Source: *Heritage 21*, September 2018)

The existing buildings on site vary in height, with the majority being single or double storey. The site includes single-storey buildings (e.g. the Interwar dwelling B17), single-storey buildings with a mezzanine (e.g. office building B1), two-storey buildings (e.g. office building B6), a three-storey building (B22), a four-storey building (B7), and a five-storey building (B11).

The Roche complex is listed as a heritage item under the Warringah Local Environmental Plan 2011 (I52), while the Givaudan-Roure Office is also listed (I53). The ‘Roche Complex’ in this report refers to the following buildings: B1, B2, B3, B6, B7 and B11.

### 3.5 The Roche Complex

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 3, a two-storey brick warehouse building with glass curtain walls and steel detailing that has undergone significant modification including the subdivision of the formerly open place office space.

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.

Building 7 is a four-storey building using horizontal and vertical linear elements to articulate the essential geometric rhythms particular to the modernist style of architecture. The use of flat, plain bands of white set against the continuous fenestration of glass creates contrast along the external facades. Internally, the building retains its large industrial scale and open plan format.

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.



## 4.0 HERITAGE SIGNIFICANCE

### 4.1 Established Significance

The following Statement of Significance is available for the site on the State Heritage Inventory:

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

### 4.2 Statement of Cultural Significance

The following Statement of Significance 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 19<sup>th</sup>-20<sup>th</sup> 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.*

For the inventory sheets regarding the individual buildings within the subject site, refer to Section 4.0 of the CMP.

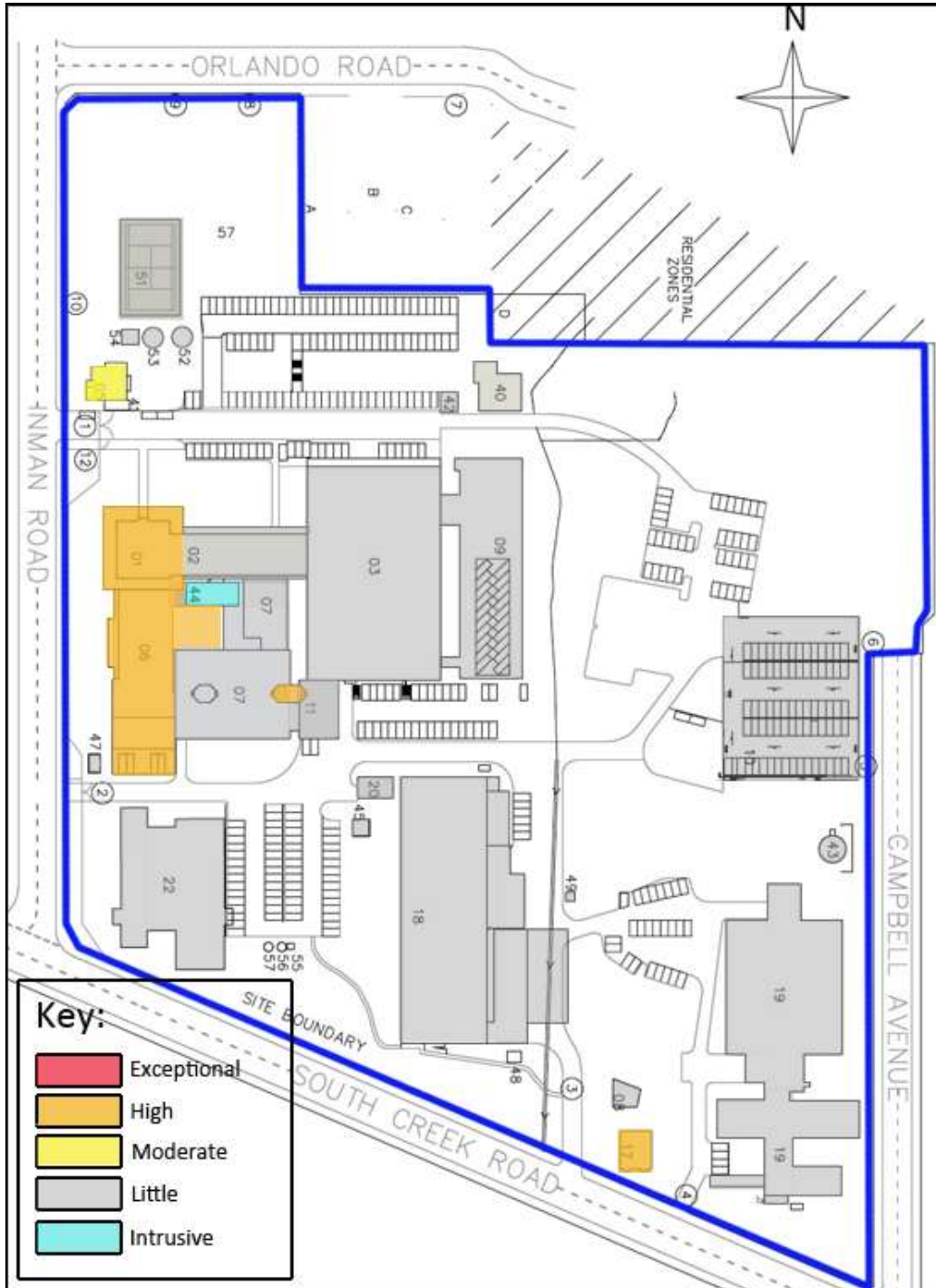


Figure 9. Site plan showing the allocated grading of significance for the buildings and structures on the site.

## 5.0 PROPOSED WORKS

### 5.1 Description of Proposal

From the set of drawings provided by SBA Architects, dated 09 May 2019, it is understood that the proposal would include the following:

- Demolition of Buildings 03, 07, 09, 11, 18, 22, 44 and structures 20, 45, 46, 48;
- The retention of Buildings 01, 02, 06, the hexagonal tower, the internal courtyard and the existing cottage facing Inman Road (05);
- Construction of 11 warehouse units;
- Construction of an underground carpark and self-storage facility;
- Use of the existing cottage (B05) as a café;
- Use of Buildings 02 and 06 for commercial office; and
- Retention of soft landscaping, with the introduction of additional soft landscaping.

### 5.2 Drawings

Specific details of the proposed development are shown in drawings by SBA Architects dated 01 November 2019, received by Heritage 21 on 1 November 2019. These are partly reproduced below at small scale for reference purposes; the full-size drawings accompanying the application should be referred to for any details.



Figure 10. Proposed Site Plan.





Figure 11. Proposed Industrial Development, Ground Floor Plan.

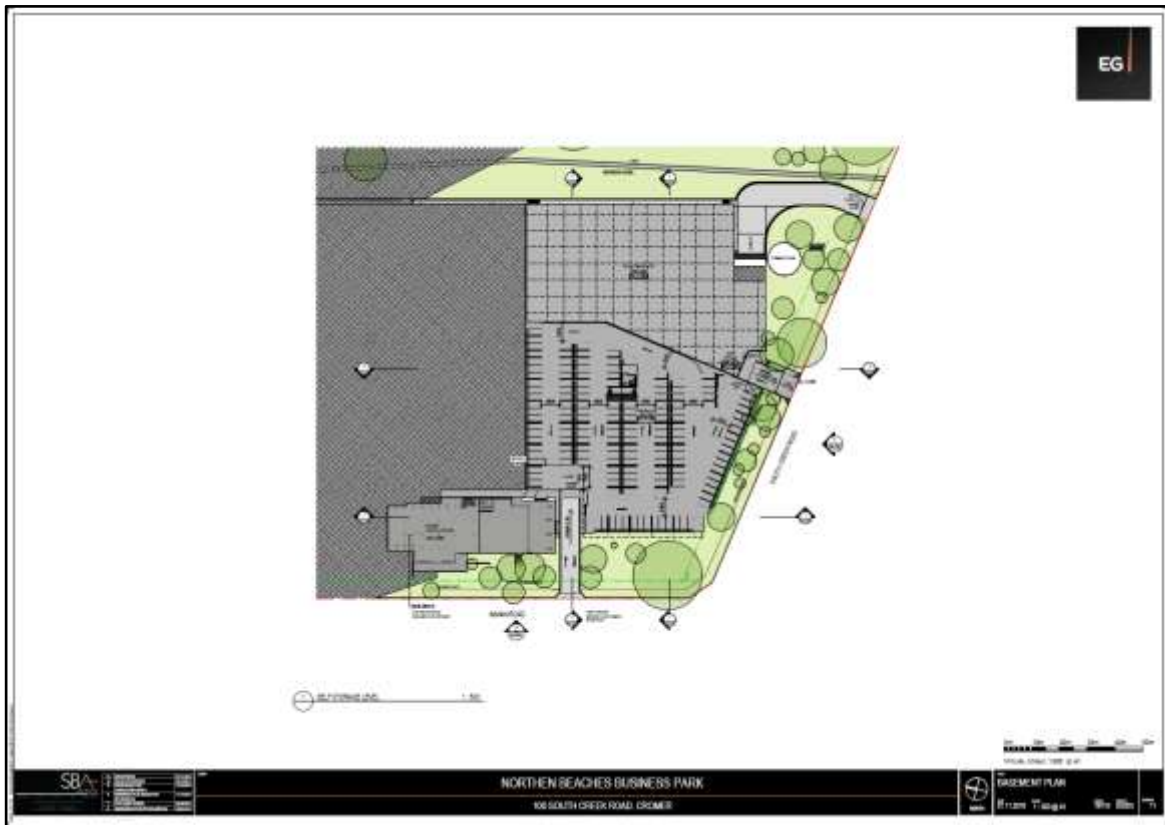


Figure 12. Proposed Industrial Development, Basement Plan.



Figure 13. Proposed Industrial Development, Level 1 Plan.



Figure 14. Proposed Industrial Development, Roof Plan.



Figure 15. Proposed Industrial Development, Demolition Plan



Figure 16. Proposed Industrial Development, Elevations 1



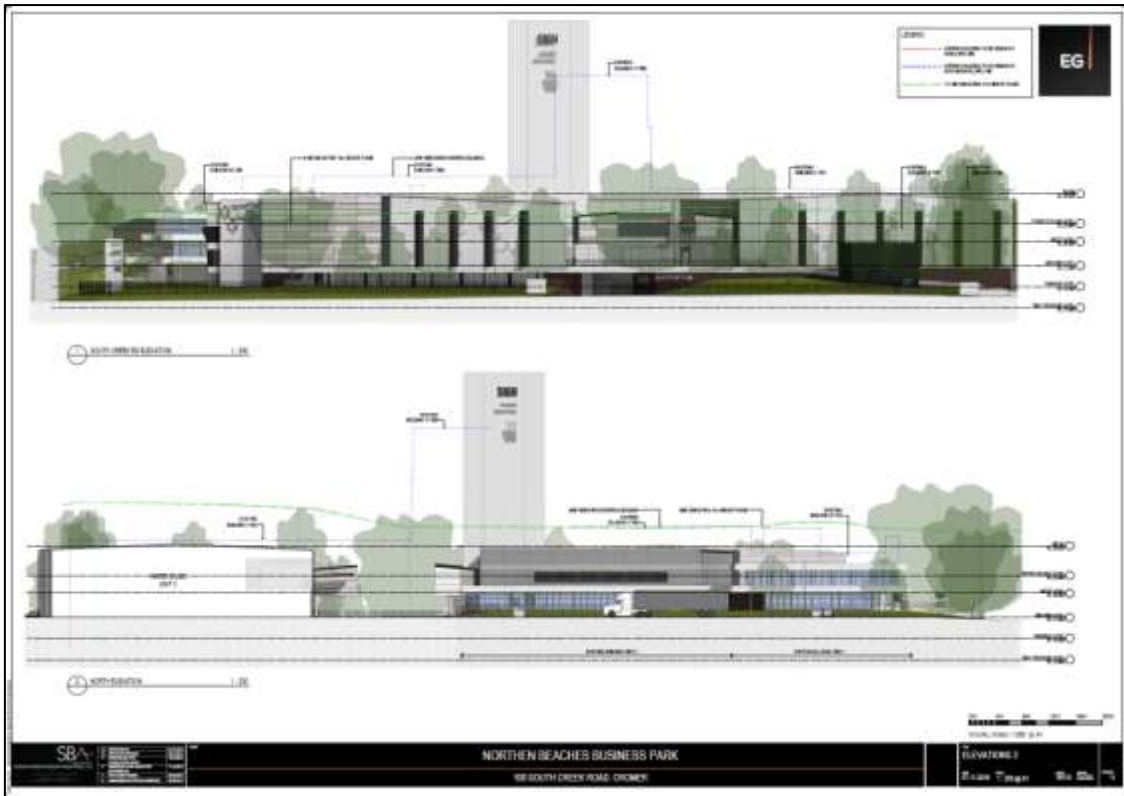


Figure 17. Proposed Industrial Development, Elevations 2



Figure 18. Proposed Industrial Development, Sections 1



Figure 19. Proposed Industrial Development, Sections 2



Figure 20. Proposed Industrial Development, Perspective View 1.



Figure 21. Proposed Industrial Development, Perspective View 1 – External Finishes



Figure 22. Proposed Industrial Development, Perspective Views 2.



Figure 23. Proposed Industrial Development, Perspective Views 2 - Notes.



Figure 24. Proposed Industrial Development, Perspective View 3.



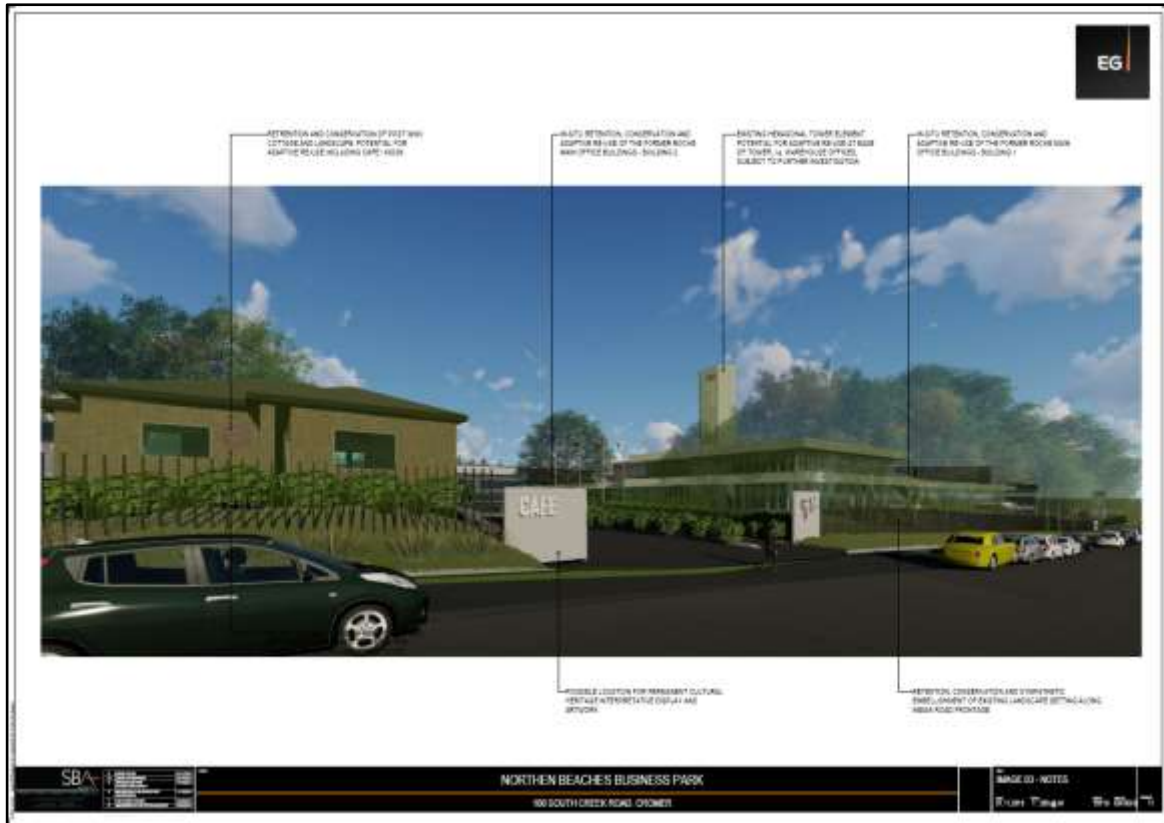


Figure 25. Proposed Industrial Development, Perspective View 3 - Notes.



Figure 26. Proposed Industrial Development, Perspective View 4.



Figure 27. Proposed Industrial Development, Perspective View 6.



Figure 28. Proposed Industrial Development, Perspective View 7.



Figure 29. Proposed Industrial Development, Perspective View 8.



## 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 ('WLEP')*

The statutory heritage conservation requirements contained in Section 5.10 of the 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.<sup>3</sup> These are divided in sections to match the different types of proposal 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.

##### ***Demolition of a building or structure***

- *Have all options for retention and adaptive re-use been explored?*
- *Can all of the significant elements of the heritage item be kept and any new development be located elsewhere on the site?*
- *Is demolition essential at this time or can it be postponed in case future circumstances make its retention and conservation more feasible?*
- *Has the advice of a heritage consultant been sought? Have the consultant's recommendations been implemented? If not, why not?*

##### ***New development adjacent to a heritage item (including additional buildings and dual occupancies)***

- *How is the impact of the new development on the heritage significance of the item or area to be minimised?*
- *Why is the new development required to be adjacent to a heritage item?*
- *How does the curtilage allowed around the heritage item contribute to the retention of its heritage significance?*
- *How does the new development affect views to, and from, the heritage item? What has been done to minimise negative effects?*
- *Is the development sited on any known, or potentially significant archaeological deposits? If so, have alternative sites been considered? Why were they rejected?*
- *Is the new development sympathetic to the heritage item? In what way (e.g. form, siting, proportions, design)?*
- *Will the additions visually dominate the heritage item? How has this been minimised?*
- *Will the public, and users of the item, still be able to view and appreciate its significance?*

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<sup>3</sup> Ibid.

***New landscape works and features (including carparks and fences)***

- *How has the impact of the new work on the heritage significance of the existing landscape been minimised?*
- *Has evidence (archival and physical) of previous landscape work been investigated? Are previous works being reinstated?*
- *Has the advice of a consultant skilled in the conservation of heritage landscapes been sought? If so, have their recommendations been implemented?*
- *Are any known or potential archaeological deposits affected by the landscape works? If so, what alternatives have been considered?*
- *How does the work impact on views to, and from, adjacent heritage items?*

## 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 Site Investigation (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 proposed development would not, in Heritage 21's opinion, adversely impact upon the heritage significance of the subject site for the following reasons:

- The proposed development would include the retention of buildings of high significance, including Buildings 01, 06, the hexagonal tower (B11), the cottage facing Inman Road (05) and the house located at 98 South Creek Road (B17);
- The proposal would also include the retention of Building 02, which would maintain the presentation of the Roche complex to the interior of the site;
- The proposed development would maintain the presentation of the Roche complex to Inman Road, notably with the retention of Buildings 01, 02 & 06 and the cottage (05);
- The proposed development would ensure the retention of the landmark qualities of the hexagonal tower (B11);
- The proposed development would include the retention of the industrial park setting, including the retention of the flagpoles and the soft landscaping, particularly around the perimeter of the site where a majority of the soft landscaping occurs. Further, additional soft landscaping would be introduced which would improve views to the subject site;
- Part of the internal courtyard would be retained, a significant feature of the recreational spaces that were created by Roche for the employees;
- The proposed buildings would be setback from the eastern elevation of Building 06, to maintain views to the building from the public domain;
- The proposed form, scale and design of the new warehouses would ensure that the proposed development would not visually dominate the setting of the complex of buildings on the site, particularly due to the proposed scale, the articulation of the new western façade and the additional setback of the new building which would ensure the retention of major views to Buildings 01, 02 and 06 from the public domain;
- The proposed use of the cottage on Inman Road (05) would allow for the continued use of the building, for public access to the site and for the potential to incorporate an extensive interpretation strategy; and
- The proposed introduction of additional soft landscaping around the perimeter of the site would also improve the views to the subject site and minimise the impact upon Buildings 01, 02 & 06, particularly as the landscaped setting of the site is considered to be of historic and aesthetic significance.

6.2.2 Response to the WLEP 2011

5.10	Heritage 21's Response
<p><i>(1) Objectives</i>  <i>The objectives of this clause are as follows:</i>  <i>(a) to conserve the environmental heritage of Warringah,</i>  <i>(b) to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,</i>  <i>(c) to conserve archaeological sites,</i>  <i>(d) to conserve Aboriginal objects and Aboriginal places of heritage significance.</i></p>	<p>The proposal would include the retention of the significant buildings of the Roche Complex, with the proposed alterations and additions to ensure the use of the subject site and to improve views to the site from the surrounding area.</p> <p>Heritage 21 I of the opinion that the proposed form and detailing of the new development, in conjunction with the retention of existing soft landscaping and the introduction of additional soft landscaping would not negatively impact upon the significance on the item. The proposal includes an updated Conservation Management Plan that sets out a grading of significance of the various buildings on site and proposes substantial conservation actions and policies for the long term conservation and maintenance of the subject complex.</p>
<p><i>(2) Requirement for consent</i>  <i>Development consent is required for any of the following:</i>  <i>(a) demolishing or moving any of the following or altering the exterior of any of the following (including, in the case of a building, making changes to its detail, fabric, finish or appearance):</i>  <i>(i) a heritage item,</i>  <i>(ii) an Aboriginal object,</i>  <i>(iii) a building, work, relic or tree within a heritage conservation area,</i>  <i>(b) altering a heritage item that is a building by making structural changes to its interior or by making changes to anything inside the item that is specified in Schedule 5 in relation to the item,</i>  <i>(c) disturbing or excavating an archaeological site while knowing, or having reasonable cause to suspect, that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed,</i>  <i>(d) disturbing or excavating an Aboriginal place of heritage significance,</i>  <i>(e) erecting a building on land:</i>  <i>(i) on which a heritage item is located or that is within a heritage conservation area, or</i>  <i>(ii) on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance,</i>  <i>(f) subdividing land:</i></p>	<p>This Statement of Heritage Impact and attached Conservation Management Plan has been prepared as part of the application to assess the impact of the proposed works upon the heritage significance of the item including its landscaped areas, setting and fabric.</p>

<p>(i) on which a heritage item is located or that is within a heritage conservation area, or</p> <p>(ii) on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance.</p>	
<p>(4) Effect of proposed development on heritage significance</p> <p>The consent authority must, before granting consent under this clause in respect of a heritage item or heritage conservation area, consider the effect of the proposed development on the heritage significance of the item or area concerned. This subclause applies regardless of whether a heritage management document is prepared under subclause (5) or a heritage conservation management plan is submitted under subclause (6).</p>	<p>This Statement of Heritage Impact has been prepared to provide the requisite information to the consent authority in order to make a assessment prior to the granting of consent.</p>
<p>(5) Heritage assessment</p> <p>The consent authority may, before granting consent to any development:</p> <p>(a) on land on which a heritage item is located, or</p> <p>(b) on land that is within a heritage conservation area, or</p> <p>(c) on land that is within the vicinity of land referred to in paragraph (a) or (b), require a heritage management document to be prepared that assesses the extent to which the carrying out of the proposed development would affect the heritage significance of the heritage item or heritage conservation area concerned.</p>	<p>A Statement of Heritage Impact and the Conservation Management Plan has been prepared by Heritage 21 to assess the extent to which the proposed development would affect the significance of the item and its surrounding area.</p>
<p>(6) Heritage conservation management plans</p> <p>The consent authority may require, after considering the heritage significance of a heritage item and the extent of change proposed to it, the submission of a heritage conservation management plan before granting consent under this clause</p>	<p>To ensure that the extent of works and the proposed modification to the heritage item are recorded, a Conservation Management Plan has been prepared that outlines the historical narrative of the item, documents its significance and demonstrates the management policies for the conservation and long-term maintenance of the subject item.</p>
<p>(10) Conservation incentives</p> <p>The consent authority may grant consent to development for any purpose of a building that is a heritage item or of the land on which such a building is erected, or for any purpose on an Aboriginal place of heritage significance, even though development for that purpose would otherwise not be allowed by this Plan, if the consent authority is satisfied that:</p> <p>(a) the conservation of the heritage item or Aboriginal place of heritage significance is facilitated by the granting of consent, and</p>	<p>The proposed work includes the change of use of the retained heritage cottage at the north-western edge of the site to a non-permissible use. The change of use proposed would be to a commercial café. This proposed change of use would facilitate a more public use to the said building thus allowing a larger group of people to interact with the subject site.</p> <p>The applicant also foresees the need to continue using the existing significant buildings as office spaces. The use of the heritage buildings would be subject to the occupant or tenant. As the tenant for the subject property is still unknown, it is difficult to assume that any future tenant would occupy both the warehouse buildings and the</p>

<p><i>(b) the proposed development is in accordance with a heritage management document that has been approved by the consent authority, and</i></p> <p><i>(c) the consent to the proposed development would require that all necessary conservation work identified in the heritage management document is carried out, and</i></p> <p><i>(d) the proposed development would not adversely affect the heritage significance of the heritage item, including its setting, or the heritage significance of the Aboriginal place of heritage significance, and</i></p> <p><i>(e) the proposed development would not have any significant adverse effect on the amenity of the surrounding area.</i></p>	<p>original office spaces of the heritage item. It is proposed that Council facilitate the change of use of the subject heritage buildings to ensure that the significant historic sections of the site, that are commensurate to a commercial function, continue to be utilised into the future along with the warehouse facility.</p> <p>The proposed change of use would not only increase public awareness but would also ensure the long term use of the subject building. The use of the buildings as a café and offices would be beneficial to the local community as well.</p> <p>In the case of the five part test, Heritage 21 is of the opinion that:</p> <ol style="list-style-type: none"> <li>a. While the proposal includes demolition of certain sections of the subject item, buildings of high significance are being retained a conserved along with the landscape setting and retention of a substantial segment of the curtilage.</li> <li>b. A detailed Conservation Management Plan has been prepared for the subject item and the proposal seeks to ensure that the objectives and conservation polices of the document are positively satisfied to ensure that there is minimal impact upon the subject item and its setting.</li> <li>c. The applicant would ensure that all works to the significant sections of the subject item would be conserved and retained as outlined in the Conservation Management Plan submitted as part of this proposal. The applicant has also engaged with Council in several meetings to ensure that the proposal would have a positive heritage outcome.</li> <li>d. The impacts upon the amenity of the surrounding area have been minimised by the retention of significant sections of the heritage item. Retention of a low lying form and utilisation of sympathetic materials that would not dominate the surrounding streetscape are some of the design tools used to reduce impact to the surrounding area.</li> </ol>
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6.2.3 100 South Creek Road, Cromer CMP

Policy	Heritage 21's Response
<p><i>Policy 1.1 – Conservation Approach</i>  <i>The ongoing conservation and development of the place should be carried out in accordance with the principles of the Australia ICOMOS Charter for the Conservation of Places of Cultural Significance 2013 ('the Burra Charter').</i></p>	<p>Complies. The Conservation Management Plan submitted as part of this application is based on the guiding principles of the Burra Charter.</p>
<p><i>Policy 1.2 – Relationship to Significance</i>  <i>The Statement of Significance and assessments of the significance of individual elements set out in this report should guide all planning for and carrying out of work on the site.</i></p>	<p>The proposed design has undergone significant modification, in direct consideration of the conservation policies and the gradings of significance of all elements within the subject site, as outlined in the CMP.</p>
<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 permitted where:</i></p> <ul style="list-style-type: none"> <li>•<i>The work makes possible the recovery of aspects of greater significance;</i></li> <li>•<i>The work helps ensure the security and viability of the place;</i></li> <li>•<i>There is no feasible alternative (e.g. to meet safety requirements);</i></li> <li>•<i>The area, element, or fabric is adequately recorded and, where appropriate, interpreted; and</i></li> <li>•<i>Full assessment of alternative options has been undertaken to minimise adverse impacts.</i></li> </ul>	<p>Noted.</p>
<p><i>Policy 2.1 – Adoption and Endorsement</i>  <i>The conservation policies set out in this document should be adopted and endorsed as a guide to future conservation, management and development of the place.</i></p>	<p>Noted.</p>
<p><i>Policy 2.2 – Review of CMP</i>  <i>This CMP should be reviewed at five yearly intervals or alternatively at such a time that major changes are proposed for the site.</i></p>	<p>Noted.</p>
<p><i>Policy 3.1 – Coordinated Planning</i>  <i>Proposed changes to use or fabric and/or development of any part of the site should always be considered as part of a coordinated and documented plan for the whole.</i></p>	<p>The proposed design of the redevelopment considers the conservation policies and gradings of significance outlined within the CMP. Heritage 21 have been largely involved in the design process, in ensuring that the proposed development does not generate a negative heritage impact upon the heritage significance of the subject site.</p>
<p><i>Policy 3.2 – Responsible Approach</i>  <i>A responsible approach to design, planning and maintenance should be developed within the guidelines of</i></p>	<p>Noted.</p>

<p><i>this plan. The objective should be to make appropriate, efficient and safe use of the place having regard to its amenity, character and cultural significance.</i></p>	
<p><i>Policy 3.3 – Change of Use of the Place If a change of use of the place is proposed, this CMP should be reviewed by experience heritage professionals. The suitability of the proposed use should be investigated to avoid negative impact upon heritage significance.</i></p>	<p>Noted.</p>
<p><i>Policy 4.1 – Expert Heritage and Conservation Advice 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 have been engaged to provide heritage design advice to ensure that the proposal would not detract from the heritage significance of the Former Roche Facility and the subject site.</p>
<p><i>Policy 4.2 – Tradespeople 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 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 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>Heritage 21 have been engaged to produce a heritage interpretation strategy to mitigate the proposed loss of fabric of moderate significance. The proposal would ensure the retention of fabric of high significance including the hexagonal tower, Buildings 01, 02 &amp; 06 and the landscaped setting.</p>
<p><i>Policy 5.2 – Proposed Alterations to Fabric of Little Significance Proposed changes to fabric identified in this CMP as being of ‘little significance’ may take place so long as it does not result in a reduction of the significance constituted in the elements and spaces identified in this report as possessing ‘high significance’. Demolition of such spaces or elements is generally permissible where appropriate. Any new work proposed to such spaces identified as possessing little significance</i></p>	<p>The proposed alterations to fabric of little significance have been assessed in consideration of the gradings of significance outlined in the CMP. The proposed introduction of a substantial interpretation strategy would, in Heritage 21’s opinion, mitigate the proposed loss of fabric of little significance and would not detract from the significance of highly significant fabric and buildings.</p>

<p><i>should, wherever possible, be sympathetic to the original fabric and spaces.</i></p> <p><i>Any modification to fabric of little significance is to be subject to a formal Statement of Heritage Impact in accordance with the Heritage Branch guidelines.</i></p>	
<p><b>Policy 5.3 – Proposed Alterations to Fabric of Intrusive Significance</b></p> <p><i>Proposed changes to fabric identified in this CMP as being ‘intrusive’ may take place so long as it does not result in a reduction of the significance constituted in the elements and spaces identified in this report as possessing ‘high significance’.</i></p> <p><i>Such intrusive spaces and elements should be removed or modified so as to eliminate or minimise their detrimental impact on the significance of the site.</i></p> <p><i>Any removal of intrusive fabric is to be subject to a formal Statement of Heritage Impact in accordance with the Heritage Branch guidelines.</i></p>	<p>The proposal has been designed in consideration of the CMP, to ensure that the proposed 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 redevelopment 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><b>Policy 6.1 – Addition of New Buildings / Structures</b></p> <p><i>Guidelines should address the design of new buildings or structures. Additions should be defined in location, form, height, bulk and the effect they have on existing fabric. New buildings and features might be detrimental to the place and its setting and should also be defined in terms of their location, form, height, bulk and their effect on views to and from the place.</i></p> <p><i>Any introduction of new buildings or elements is to be subject to a formal Statement of Heritage Impact in accordance with the Heritage Branch guidelines.</i></p>	<p>Heritage 21 have been involved within the design process, to ensure that the proposed form, scale, design, materials and finishes of the proposed new buildings would not detract from the significance of the heritage item. In particular, the proposed design of the new buildings have been developed to ensure the retention of significant fabric and landmark qualities, such as the hexagonal tower. Further, the proposed design of the new buildings have been reduced in scale, setback from Buildings 1 &amp; 6 to ensure the retention of views to the building from the public domain and the proposed colours would minimise the visual impact of the proposed on the significance of the site. The proposed introduction of additional soft landscaping would also improve the views to the site and minimise the visual impact of the proposed works.</p>
<p><b>Policy 6.2 – Coordinated Design and Planning</b></p> <p><i>Additional buildings or elements should not be planned in isolation but in the context of the whole site, its layout and use.</i></p>	<p>The proposal considers the entire site, including the retention of the significant vegetation located within the north-eastern section of the site, and the proposed introduction of additional soft landscaping within the south-eastern section of the site that would undergo redevelopment.</p>
<p><b>Policy 6.3 – Scale, Form and Fabric of New Structures</b></p> <p><i>The scale and massing of new elements should not dominate the significant elements of the site. New additions should also respect the form and fabric of the existing structures.</i></p>	<p>The proposed scale of the new structures would ensure that they would not visually dominate the buildings to be retained. This would include the retention of the hexagonal tower and maintaining its landmark qualities. In addition, the proposed siting of the new structures would ensure the retention of views from the public domain to the</p>

	existing buildings, particularly with the proposed setback of the new buildings and the opportunity to improve the existing soft landscaping.
<i>Policy 7.1 – Reinstatement of Missing Elements Reinstatement or reconstruction of missing elements should be considered if there is sufficient physical and documentary evidence to justify its reconstruction and it does not involve changes to or removal of fabric of high significance.</i>	Noted.
<i>Policy 8.1 – External Views 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>	The proposed siting and scale of the new buildings would ensure the retention of views from the public domain towards the subject site and the Former Roche Facility complex, notably from Inman and South Creek Roads. The proposed redevelopment and reactivation of the site would also offer the opportunity to improve the soft landscaping within the subject site, and in turn the views.
<i>Policy 8.2 – Internal Views 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>	The proposed retention of the flagpoles and internal courtyard would ensure the retention of significant views and spaces from within the subject site and allow for the introduction of additional soft landscaping. The proposal would maintain the industrial park setting, a significant feature of the development of the site.
<i>Policy 8.3 – Landscaped Setting The site landscaped setting should be maintained. The significance of the landscaping is predominantly contained within the landscaping as a whole, rather than specific trees or other plantings as stand-alone items.</i>	The proposal would include the retention of the entry landscaped setting and the potential for additional substantial soft landscaping to be introduced throughout the site.
<i>Policy 8.4 – Landscape CMP A Landscape Conservation Management Plan should be prepared by a suitably qualified heritage landscape expert, to assess the heritage significance of the site’s trees and plantings.</i>	Noted.
<i>Policy 9.1 – Archaeological Zoning and Management Plan An Archaeological Zoning and Management Plan for the site should be prepared.</i>	Noted.
<i>Policy 9.2 – Due Diligence Assessment An Aboriginal Archaeological Due Diligence Assessment must be carried out by a suitably qualified archaeologist, as part of the assessment process prior to approval of any works that may disturb indigenous archaeological relics.</i>	Noted.
<i>Policy 9.3 – Archaeological Assessment A historical archaeological assessment must be carried out by a suitably qualified archaeologist, as part of the assessment process prior to approval of any works that may disturb historical archaeological relics.</i>	Noted.

<p><i>Policy 10.1 – Interpretation Strategy</i>  <i>An Interpretation Strategy should be developed for the site by a suitably qualified heritage professional.</i></p>	<p>Heritage 21 have created a preliminary heritage interpretation strategy that would be developed further in conjunction with the proposal.</p>
<p><i>9.11 Review of Heritage Inventory Sheets</i>  <i>The site includes three heritage listed items as discussed in Section 7.3: ‘Roche Building’ (I52), ‘Givaudan-Roure Office’ (I53) and ‘Trees’ (I38).</i></p>	<p>Noted.</p>

#### 6.2.4 Response to the relevant OEH questions

##### ***Demolition of a building or structure***

- *Have all options for retention and adaptive re-use been explored?*

**Response** – Yes, however due to the changing needs of the surrounding area and the desired future use of the subject site it has not been deemed possible to retain the complex in its existing form.

- *Can all of the significant elements of the heritage item be kept and any new development be located elsewhere on the site?*

**Response** – Yes, the proposed development has undergone a significant design process to ensure the retention of highly significant elements of the heritage item. The proposed design has also been assessed in conjunction with the CMP for the subject site, see above.

- *Is demolition essential at this time or can it be postponed in case future circumstances make its retention and conservation more feasible?*

**Response** – The proposed demolition is not due to the condition of the fabric.

- *Has the advice of a heritage consultant been sought? Have the consultant’s recommendations been implemented? If not, why not?*

**Response** – Yes, Heritage 21 have been engaged to ensure the retention of significant fabric and to ensure that the proposed design, form and scale would not generate a negative heritage impact upon the existing heritage item. The retention of the Buildings 01, 02, 06 and the hexagonal tower have been integrated into the design, based upon Heritage 21’s advice.

##### ***New development adjacent to a heritage item (including additional buildings and dual occupancies)***

- *How is the impact of the new development on the heritage significance of the item or area to be minimised?*

**Response** – The proposed development would include the retention of significant fabric and buildings, including the hexagonal tower. The proposed siting, scale and form of the new development would ensure that the proposed addition would not visually dominate the setting but would be sufficiently setback from Buildings 01, 02 & 06 and would maintain the presentation of the subject site to Inman Road. Further, the proposal would include the retention of soft landscaping and the introduction of additional soft landscaping.

- *Why is the new development required to be adjacent to a heritage item?*

**Response** – Due to the vacancy and desired future use of the subject site it has been deemed necessary for the redevelopment of the subject site.

- *How does the curtilage allowed around the heritage item contribute to the retention of its heritage significance?*

**Response** – The proposed development has undergone a significant design process to ensure that the curtilage is retained, this includes the retention of the soft landscaping and the introduction of additional soft landscaping. The proposed retention of Buildings 01, 02 & 06 would ensure that the proposed development would not impact upon the existing setback from Inman Road. In addition, the proposed setback of the new warehouses from Buildings 01, 02 & 06 would further minimise the impact of the proposed development on the views to the subject site.

- *How does the new development affect views to, and from, the heritage item? What has been done to minimise negative effects?*

**Response** – The proposed additional setback of the new warehouses from Buildings 01, 02 & 06 and the retention of the hexagonal tower has been incorporated into the proposed design to further minimise potential negative heritage impacts of the proposed development on the views to/from the heritage item. Further, the proposed scale of the warehouse units has also been designed to minimise the visual impact upon Buildings 01, 02 & 06 and to ensure the retention of the landmark qualities of the hexagonal tower.

- *Is the development sited on any known, or potentially significant archaeological deposits? If so, have alternative sites been considered? Why were they rejected?*

**Response** – It is beyond the scope of this report; an archaeological assessment has been conducted by Artefact.

- *Is the new development sympathetic to the heritage item? In what way (e.g. form, siting, proportions, design)?*

**Response** – Yes, the proposed siting, form, scale and design of the new development has been designed to further minimise the impact of the proposed development on the complex. The proposed setback would ensure that views to the complex are maintained, the proposed scale would ensure that the proposed addition would not visually dominate the setting and the proposed introduction of additional soft landscaping would also further minimise the impact of the proposed development, particularly as the landscaped setting is of high heritage significance. The selection of materials and finishes would also offer the opportunity to ensure that the proposed development would be sympathetic to the existing. The proposed colours have been chosen to further minimise the visual impact of the proposed warehouse units.

- *Will the additions visually dominate the heritage item? How has this been minimised?*

**Response** – No, the proposal has undergone a significant design process to further minimise the potential heritage impact of the proposed development on the complex and subject site, particularly with the introduction of an additional setback, form, scale and the retention of the hexagonal tower and Buildings 01, 02 & 06. The introduction of additional soft landscaping would also further minimise the visual impact of the proposed additions on the heritage item. The



proposed articulation of the warehouse units would also assist with the separation of bulk and minimising the visual impact upon the existing building. Further, details of the elevation design and articulation treatment will evolve as the DA progresses.

- *Will the public, and users of the item, still be able to view and appreciate its significance?*

**Response** – Yes, the proposed siting and scale of the proposed buildings would ensure that the proposed development would not generate a negative heritage impact upon views to the subject site from the public domain. The proposed setback and scale of the warehouse units has also been chosen to further minimise the visual impact of the proposed structures on Buildings 1, 6 and the hexagonal tower, and in ensuring that the form and scale would not detract from the heritage significance of the buildings. In addition, the proposed introduction of additional soft landscaping would further minimise the visual impact of the proposed additions. The views to the subject site from Inman Road, towards the significant built elements, including Buildings 01, 02, 06 and the hexagonal tower would also be retained per the proposed design and setback.

***New landscape works and features (including carparks and fences)***

- *How has the impact of the new work on the heritage significance of the existing landscape been minimised?*

**Response** – The impact of the new work has been minimised through the proposed introduction of additional soft landscaping, and the retention of the existing landscaping.

- *Has evidence (archival and physical) of previous landscape work been investigated? Are previous works being reinstated?*

**Response** – Yes, historical research has indicated the development of landscape work within the subject site. Due to the preliminary stages of the design, additional discussions will be required regarding the proposed landscaping.

- *Has the advice of a consultant skilled in the conservation of heritage landscapes been sought? If so, have their recommendations been implemented?*

**Response** – Not at this preliminary stage.

- *Are any known or potential archaeological deposits affected by the landscape works? If so, what alternatives have been considered?*

**Response** – It is beyond the scope of this report, consideration of the Artefact Report produced in 2015 would be required.



## 7.0 CONCLUSION & RECOMMENDATIONS

### 7.1 Impact Summary

The NSW OEH's guidelines (1996) require the following aspects of the proposal to be summarised. This is based on the assessment of impact provided in Section 6.0 of this SoHI.

#### 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 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;
- 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;
- The proposed form, scale and design of the new warehouses would minimise the visual impact of the proposed development on the existing setting and would not detract from the significance of the subject site. Notably, the proposed introduction of an additional setback of the proposed buildings from Buildings 01, 02 & 06 would ensure the retention of views to the buildings from the public domain, and the proposed articulation and colours of the new buildings would minimise the visual impact of the proposed buildings on the significance of the subject site; and
- The proposal offers the potential to incorporate an extensive interpretive strategy that would convey to the users of the subject site the historical significance of the 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. The neutral/positive impacts of the proposal have been addressed above in Section 7.1.1. Recommendations are provided in Section 7.3 below as further mitigation measures.

#### 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 the hexagonal tower, due to the landmark qualities of the tower;
- The retention of Buildings 01, 02 & 06, to maintain the presentation of the Former Roche Facility to Inman Road;
- The introduction of additional soft landscaping; and
- The adaptive re-use of the cottage located on Inman Road (05).

Mitigation measures are provided for consideration in Section 7.3 of this report which are based on our initial recommendations.

## 7.2 General Conclusion

The proposed redevelopment of the Former Roche Facility would, in Heritage 21's opinion, ensure the continued historic use of the subject site and would notably include the retention of Buildings 01, 02, 06, the hexagonal tower and the internal courtyard. The proposal would also include the retention of the soft landscaping setting and the opportunity would exist to introduce additional soft landscaping. The proposed design, form and scale of the new warehouse units would also further minimise the visual impact of the proposed structures on Buildings 01, 02 & 06, particularly as the setback of the proposed warehouses would not impact upon views to the site and the proposed articulation and colours of the warehouse façade would not detract from the significance of the subject site.

Heritage 21 is therefore confident that the proposed development complies with pertinent heritage controls and would have minimal impact on the heritage significance of the subject site.

## 7.3 Mitigation Measures

To ensure maximum conservation of significance of the subject site, Heritage 21 also recommends the following:

### 7.3.1 Photographic Archival Recording

A Photographic Archival Recording (PAR) should be prepared by a suitably qualified Heritage Consultant prior to any development being carried out on the site.

The report must consist of an archival standard photographic record of the site and buildings externally including the existing character of the streetscape and the views to and from the subject site and exteriors and interiors, landscape and curtilage area and general views to and from the site.

The recording shall be undertaken in accordance with the guidelines for Photographic Recording of Heritage Items Using Film or Digital Capture (2006) prepared by the NSW Office of Environment & Heritage and copies should be retained in Council's Archives and Local Studies collection.

### 7.3.2 Temporary Protection Measures

Prior to the commencement of any work, consideration shall be given to the development of temporary protection measures that would identify potential risks and outline methodologies to negate any physical impact on significant fabric located in the vicinity of the area of works on the subject site. This is to be prepared by a suitably qualified contractor and implemented prior to the works to be monitored by the architect and followed by all tradespeople involved.

### 7.3.3 Interpretation Strategy

An Interpretation Strategy should be prepared by a heritage professional. This would identify key users of the site, develop themes and key messages for the identified audience, and propose options for communication of heritage values to visitors and users of the site. This may be in the form of permanent graphic displays, art installations, design features or other interpretive media.

### 7.3.4 Interpretation Plan

An Interpretation Plan should be prepared to develop content, installation strategy and/or a maintenance plan for the proposed interpretive media. The focus of this exercise is not for passive historical instruction but for interactive engagement between a site and the community.

## 8.0 SOURCES

- Apperley, Richard, Robert Irving, and Peter Reynolds. *A Pictorial Guide to Identifying Australian Architecture Styles and Terms from 1788 to the Present*. Sydney: Angus & Robertson, 1994.
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- Northern Beaches Council. 'Warringah Development Control Plan', 2011. <https://eservices.northernbeaches.nsw.gov.au/ePlanning/live/pages/plan/book.aspx?exhibit=DCP>
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- . 'Statements of Heritage Impact'. Heritage Office and Department of Urban Affairs & Planning, 1996. NSW Heritage Manual. <http://www.environment.nsw.gov.au/resources/heritagebranch/heritage/hmstatementsofhi.pdf>.
- Pollon, Frances, ed. *The Book of Sydney Suburbs*. Sydney: Cornstalk, 1996.
- 'Sydney Subdivision Plans'. State Library of NSW, n.d. Mitchell Map Collection. <http://www.sl.nsw.gov.au/>.