

STATEMENT OF HERITAGE IMPACT

Proposed Childcare Centre Development at 4-10 Inman Road Cromer



Job No. 9889
June 2023

Heritage21
CULTURAL BUILT HERITAGE IN THE 21ST CENTURY

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Acknowledgement of Country

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

Cover page: Former Roche Facility, facing towards Buildings 02 & 07. (Source: Heritage 21, 2 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.	14.06.2023	AP	AP
2	Report (RI) issued.	19.06.2023	AP	AP

1.0 INTRODUCTION

1.1 Background

This Statement of Heritage Impact ("SOHI" or "report") has been prepared on behalf of ID Fitouts who are the designers of the proposed childcare centre development. They have been engaged by the tenants of the subject site to submit a development application for alterations and additions at the building located at 4-10 Inman Road, Cromer ("the site").

Note: The subject site has an approved Mod 2022/0452 application for the base build works of Building 6 that has been approved on 15 December 2022 which included the removal of the later addition light weight partition, floor finishes as well as the suspended tiled ceilings.

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," and "the site." As depicted in Figure 1 below, the site is located on the northern side of South Creek Road, its eastern and western boundaries abutting Inman Road and Campbell Avenue. Additionally, it comprises of 3 lots described as Lots 1, 2 and 3 of Deposited Plan (DP) 1282038 which fall within the boundaries of the Northern Beaches Local Government Area.



Figure 1. Aerial view of the site, which is highlighted in yellow. (Source: NSW Spatial Services, "SIX Maps", accessed 1 June 2023, <http://maps.six.nsw.gov.au/>)

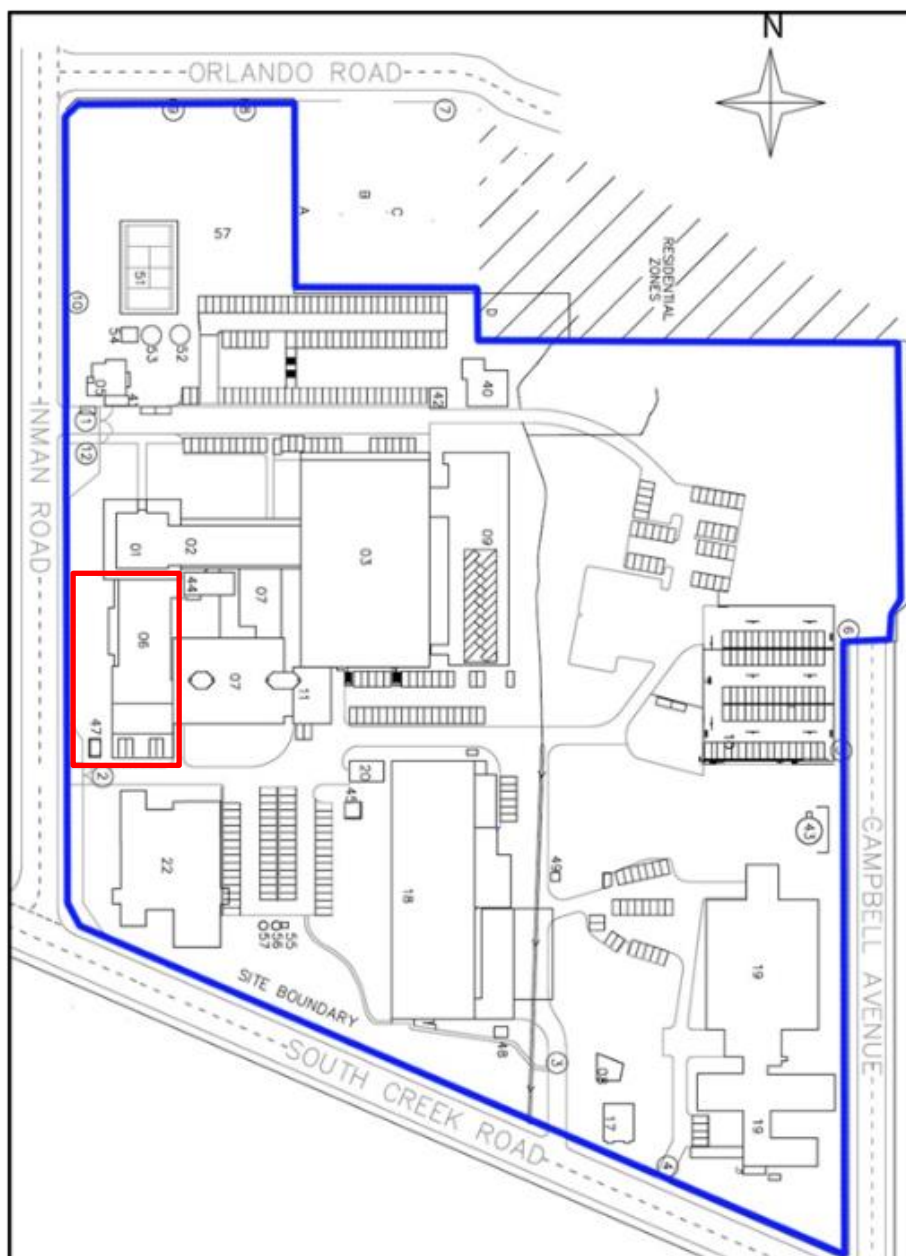


Figure 2. Existing Site Plan, identifying current building numbers. Buildings to be addressed in this report and the proposed location of the childcare centre is outlined in red.

1.3 Heritage Context

1.3.1 Heritage Listings

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

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

The details of the listings follow:

Item name	Address	Significance	Item no
Roche Building	100 South Creek Road, Cromer NSW 2099	Local	152
Givaudan-Roure Office	96 South Creek Road, Cromer NSW 2099	Local	153
Trees	Campbell Avenue, Cromer NSW 2099	Local	138

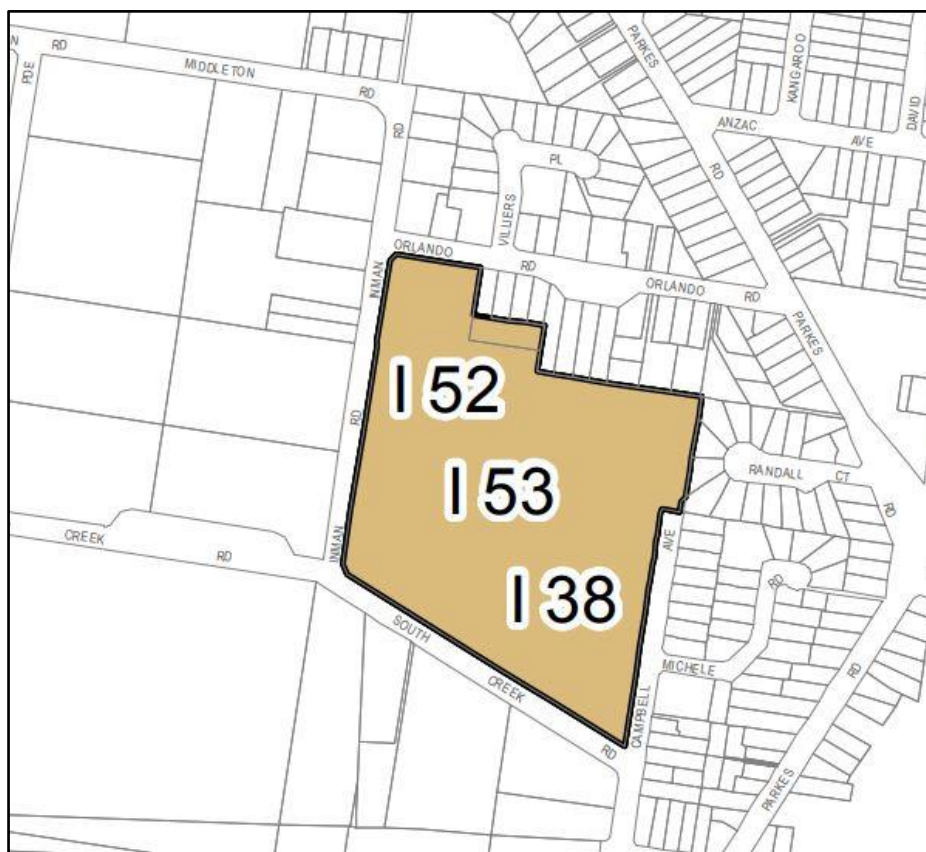


Figure 3. Detail from Heritage Map HER_009. The subject site is outlined in black and heritage items, are marked brown. (Source: NSW Legislation Online, <https://legislation.nsw.gov.au>)

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

1.3.2 Heritage Items and Heritage Conservation Areas in the Vicinity

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

1.4 Purpose

The subject site is a heritage item which is listed under Schedule 5 of the WLEP 2011. Sections 5.10(4) and 5.10(5) of the WLEP 2011 require Northern Beaches Council to assess the potential heritage impact of non-exempt development, such as the proposed works (refer to Section 5.0), on the heritage significance of the abovementioned heritage item and, also, to assess the extent (whether negative, neutral or positive) to which the proposal would impact the heritage significance of that heritage item. This assessment is carried out in Section 6.0 below.

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

1.5 Methodology

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

1.6 Authors

This Statement of Heritage Impact ("SOHI" or "report") has been prepared by Ankita Powale and overseen by Paul Rappoport, 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.
- 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

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

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

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

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

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

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

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

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

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

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

In addition to being a thriving residential and commercial centre, modern Dee Why is also a centre for industrial development in the Warringah district. Under the Cumberland Planning Scheme of the 1950's, Brookvale was designated as the district's main area for industrial zoning. As a consequence, the Warringah Shire Council, in 1956, rezoned 170 acres in Dee Why West for industrial use (including the subject site).²

Cromer used to be known as 'Dee Why West'. The name Cromer originates from 'Cromer Cottage', which in the late 1800s was located south-west of what is now the sixth tee on Cromer Golf Course. Cromer Cottage was named after the seaside town of Cromer in Norfolk, England.³ Warringah Shire Council officially renamed Dee Why West 'Cromer' in 1964.⁴

² Rappoport, Heritage Impact Statement, p5-8.

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

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

2.2 Site Specific History

The earliest Parish Map of the area – dating to the early 1800s – shows the early land grants in the surrounding area, including John Ramsay's 410 acres, granted in 1818, and William Cosser's 500 acres, granted in 1819 (refer to Figure 4).

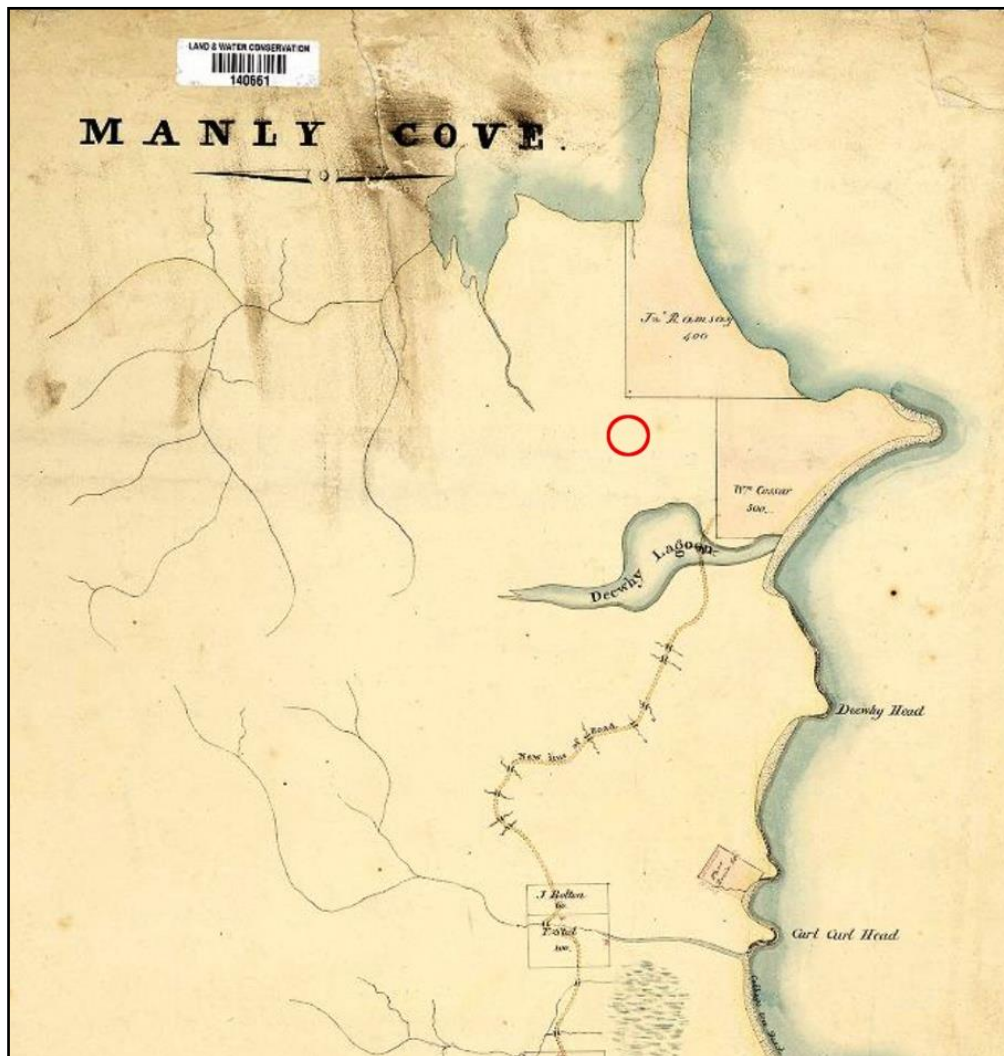


Figure 4. Detail of Parish Map (pre-1830s) of the Manly Cove parish, with the approximate location of the subject site circled. The early land grants are situated to the north of Dee Why lagoon, with two smaller grants near Curl Curl Head. (Source: Manly Cove Regional Charting MapHLRV, Sheet 6)

The land contained within the subject site became part of land grants during the late 1800s and early 1900s. It was part of five different crown grants, as shown in Figure 5 below. In 1890, Portion 639 was granted to Henry Audsley Middleton, while Portion 629 was granted to Charles Oatway. In 1891, Portions 630 and 631 were granted to Miles McRae. In 1892, Portion 632 was granted to Louisa Little. In 1914, Portion 633 was granted to James Robinson Lyell.⁵

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

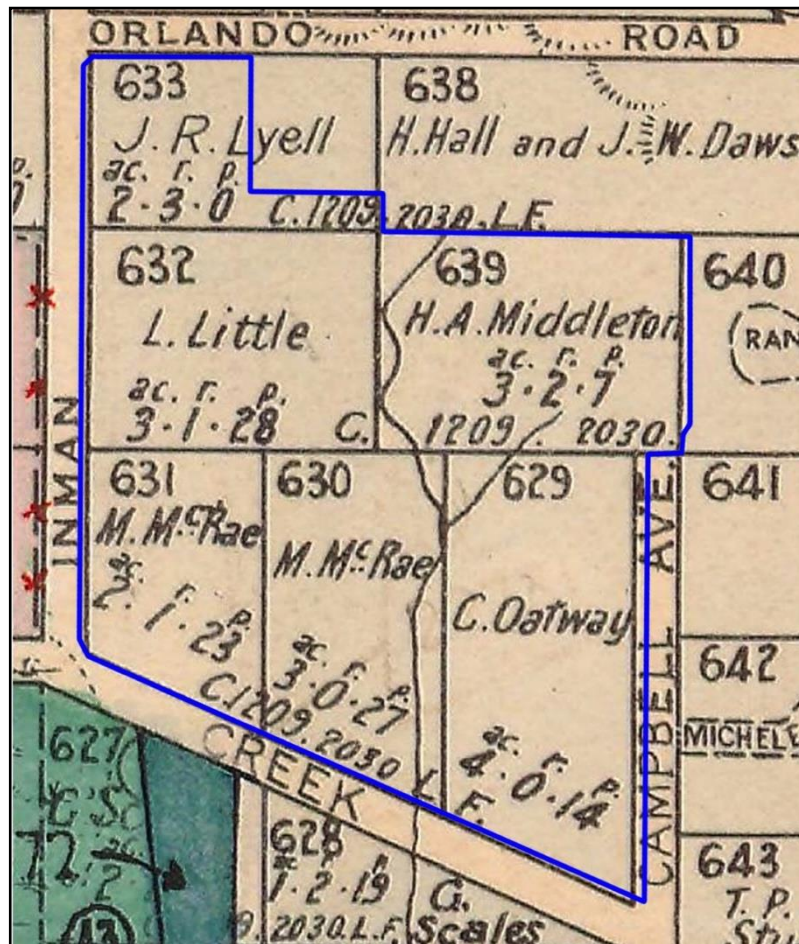


Figure 5. Detail of undated Parish Map, showing the five relevant land grants, with the approximate location of the subject site outlined in blue. (Source: Manly Cove Regional Charting Map, HLRV, Sheet 3b)

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

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

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

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



Figure 6. 1963 photo of Building 1 during construction. (Source: Roche, Corporate Affairs)



Figure 7. 1964 photo of Building 1, 2 and 3 after completion. Note the lack of landscaping. (Source: Roche, Corporate Affairs)



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



Figure 9. 1964 photo of Building 1 after completion. Note: some landscaping has been undertaken. (Source: Roche, Corporate Affairs)



Figure 10. Undated aerial of the site, c.1965. (Source: Macleod and Smith, *People, Precision, Perfection*, 65)



Figure 11. Undated aerial of the site, c. 2006. (Source: Roche, Corporate Affairs)

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

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

Date	Event
1890	Land grant to Middleton (Portion 639)
1890	Land grant to Oatway (Portion 629)
1891	Land grant to McRae (Portion 630 & 631)
1892	Land grant to Little (Portion 632)
1914	Land grant to Lyell (Portion 633)
1925-1930	Construction of B17
1930-1943	Creation of tennis court (B51)
1949-1961	Construction of B5
1962	Roche start of acquisition of site (predominantly western half)
1962-1972	Construction of B10 (by Fibrecell)
1962-1972	Construction of B18 (by Latipac / Capital Wires)
1963	Roche starts marketing Valium
1963-1964	Construction of B1, B2 & B3
1968	Cottage (B5) converted into office
1969	First batch of effervescent vitamin products manufactured
1969	Extension to B3 and construction of B6
1970	Pantene shampoos & hair dyes launched & manufactured
Early 70s	Construction of B8
1972	A/C installed in B3 including in the 'encapsulating room'
1972	Addition constructed to B6
1972-1974	Construction of Givaudan (B19)
1973-1974	Construction of B7 & B11
1974	Research Institute of Marine Pharmacology opened (B7 & 11)
1974	Construction of B20
1974	Renovations & additions to B18
1975	Roche end of acquisition of site (predominantly (eastern half)
1975	Construction of B40
1975	Cottage (B17) converted into office
1975	Extension to B6
1975	Internal alterations to B3
1975	Installation of boundary fence
1976	Lower section of B11 closed in
1977	New reinforced concrete floors in parts of B7 & alterations to L3 & L4 of B7

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

Figure 12 below, provides a visual overview of the historical development of the site and the construction of buildings and structures.

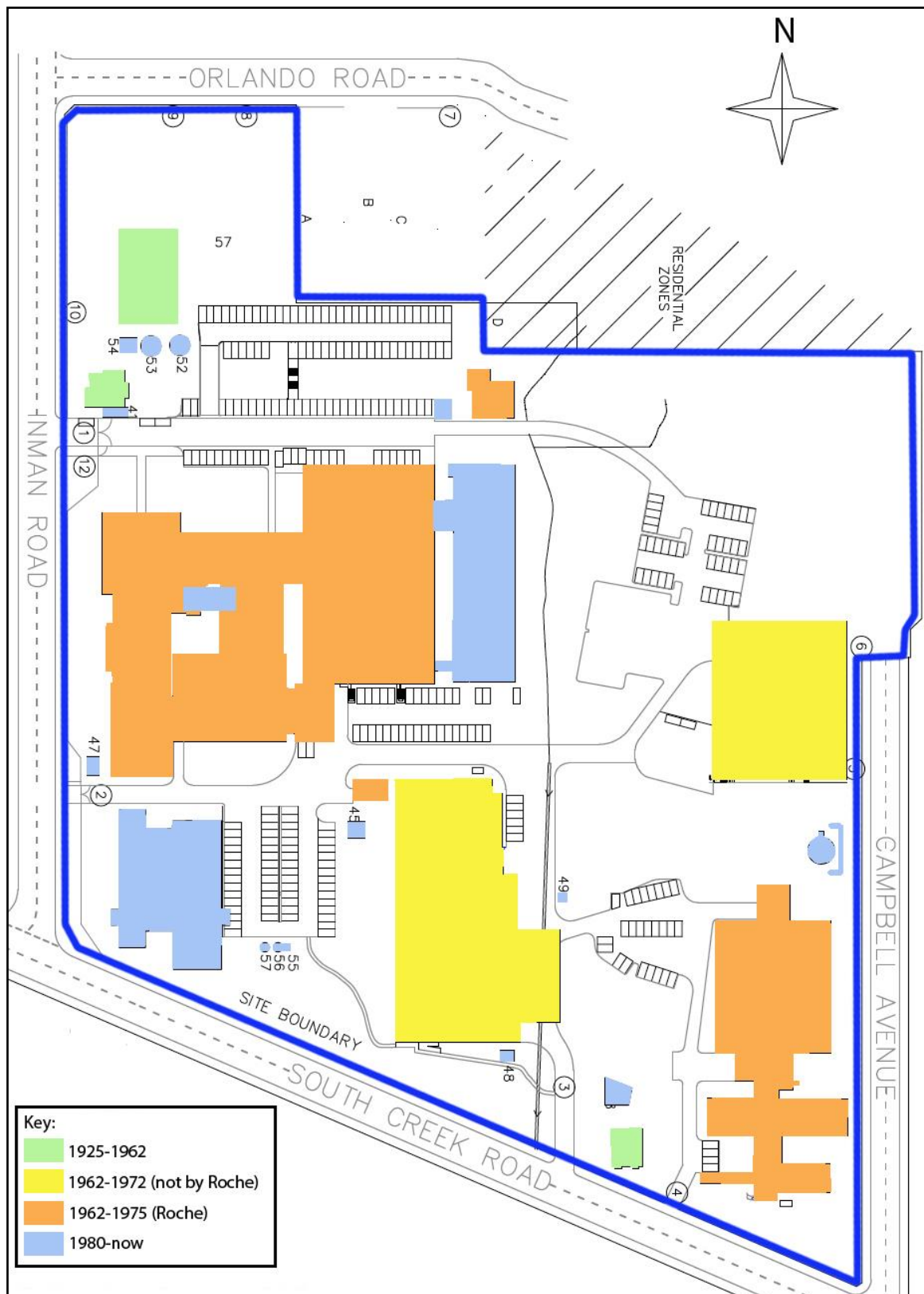


Figure 12. Current site diagram reflecting building phases.



Figure 13. 1965 historic aerial of the subject site showing that Building 06 was not constructed and the western boundary did not exhibit any landscaping. (Source: NSW Historic Imagery Viewer, available on <https://portal.spatial.nsw.gov.au/portal/apps/webappviewer/index.html?id=f7c215b873864d44bccdda8075238cb>)



Figure 14. 1971 historic aerial of the subject site showing that there was spare landscaping along the western boundary. (Source: NSW Historic Imagery Viewer)

3.0 PHYSICAL EVIDENCE

3.1 The Setting

The subject site is located at 4-10 Inman Road, Cromer (Lots 1, 2 and 3/ DP1282038). The site is bounded by South Creek Road to the south and Inman Road to the west. The north-western corner of the site is bounded by Orlando Road to the north, with the boundary stepping down towards Campbell Avenue, which forms the majority of its eastern boundary.⁷

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

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

The subject childcare centre development proposal would be located within the lower ground floor of Building 6 and the open landscape area fronting Inman Road. Currently, the landscaped area fronting Inman Road has overgrown with trees and bushes and has not been maintained. The subject site also features a tall metal palisade fence.

3.2 Physical Description

3.2.1 The Roche Complex, Buildings 1, 2 and 6

Building 1 and 2

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

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

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

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.

The lower ground floor of Building 6 has the base build works that are currently being undertaken at the subject site which are a part of the Mod 2022/0452 application approved in December 2022. The original glazing wall is located along the southern elevation of the lower ground floor. The glazing wall located along the western façade of the lower ground floor has been altered and is not original. The building also features a later addition awning along the western façade. The landscape area fronting Inman Road, along the western façade feature mature trees and shrubs which have overgrown and the area has not been maintained. The landscaped area also features the sandstone boulders which were most likely a part of the original landscaping of the subject site.

3.3 Established Significance

3.3.1 The Subject Site

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.⁸

3.4 Images

⁸ Heritage 21, Conservation Management Plan – 100 South Creek Road, Cromer.

The following photographs have been taken by Heritage 21 at the site inspection in 2020 before the base build works started at the subject site.



Figure 15. View to Building 1 from within the subject site, facing south-east.



Figure 16. View to Buildings 2, 7 & 11 from within the subject site, facing south-east.



Figure 17. View to the side elevation of Building 6 from Inman Road, facing north-east.



Figure 18. View to the subject site from Inman Road, facing east. Note Building 05 on Inman Road and the landmark qualities of Building 11.

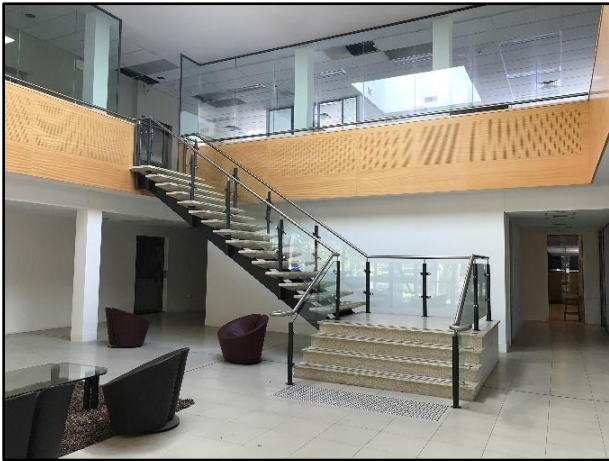


Figure 19. View to the interior of the lobby of Building 1.



Figure 20. View to the interior of office spaces within Building 6.



Figure 21. View to the interior of a meeting space within Building 6.

The following photographs have been taken by Heritage 21 at the site inspection undertaken on 26 April 2023, unless stated otherwise. Note that the base build is currently in progress at the subject site.



Figure 22. Internal view of the lower ground floor of Building 6, facing south showing the base build works in progress. Note the later-addition office fit-out has been removed.



Figure 23. Internal view of the lower ground floor of Building 6, facing west showing the base build works in progress. Note the later-addition office fit-out has been removed.



Figure 24. Internal view of the lower ground floor showing the proposed location of the kitchenette.



Figure 25. Internal view showing the original glazed wall along the southern façade of the lower ground floor.



Figure 26. Detailed view of the original glazed wall along the southern facade.



Figure 27. External view showing the existing site office structure located to the south of the subject building.



Figure 28. Detailed view of the non-original glazed wall along the southern facade.



Figure 29. External view of the later-addition glazing and awning along the western facade.



Figure 30. View of the overgrown landscaped area along the western elevation.



Figure 31. View of the overgrown trees and bushes in the landscaped area to the west.



Figure 32. View of the overgrown landscaped area along the western elevation.

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 this place. Accordingly, a Statement of Significance for the subject site is provided below (refer to Section 4.1.1). The significance of this item, will form part of our considerations in the assessment of heritage impact, undertaken in Section 6.0 below.

4.1 Established Significance

4.1.1 The Subject Site

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.⁹

⁹ Heritage 21, Conservation Management Plan – 100 South Creek Road, Cromer.

5.0 WORKS PROPOSED

5.1 Proposal Description

The proposed development would include:

Demolitions:

- Partial demolition/removal of some sections of the glazing wall along the southern façade for the installation of new doors.
- Partial demolition of some sections of the later-addition glazing wall along the western façade for the installation of new sliding doors.
- Partial demolition of the brick masonry wall along the western façade for a new access door.
- Partial demolition of the brick masonry wall along the northern façade for a new window.
- Demolition of then non-original site office structure located to the south of the subject tenancy.

Construction and fit-out:

- Alterations and additions within the interiors of the lower ground floor of Building 6 for the proposed childcare centre fit-out including installation of light weight partition walls, floor and ceiling finishes.
- Installation of new services and light fittings within the interiors of the tenancy.
- Installation of a new free standing shade structure along the western façade.

Landscaping:

- Removal of ten trees located within the western landscaped area fronting Inman Road.
- New landscaping features along the western area of the site for the new childcare centre consisting of a sand pit, story time space, seating logs, cubby tree branch structure, timber balance beams and raised vegetable beds.
- Plantation of new shrubs and plantings.
- Construction of a sandstone faced block retaining wall in the northern section of the landscaping.
- Removal of the existing non-original metal fence and its replacement with a 1.8m high aluminium blade screen fencing.

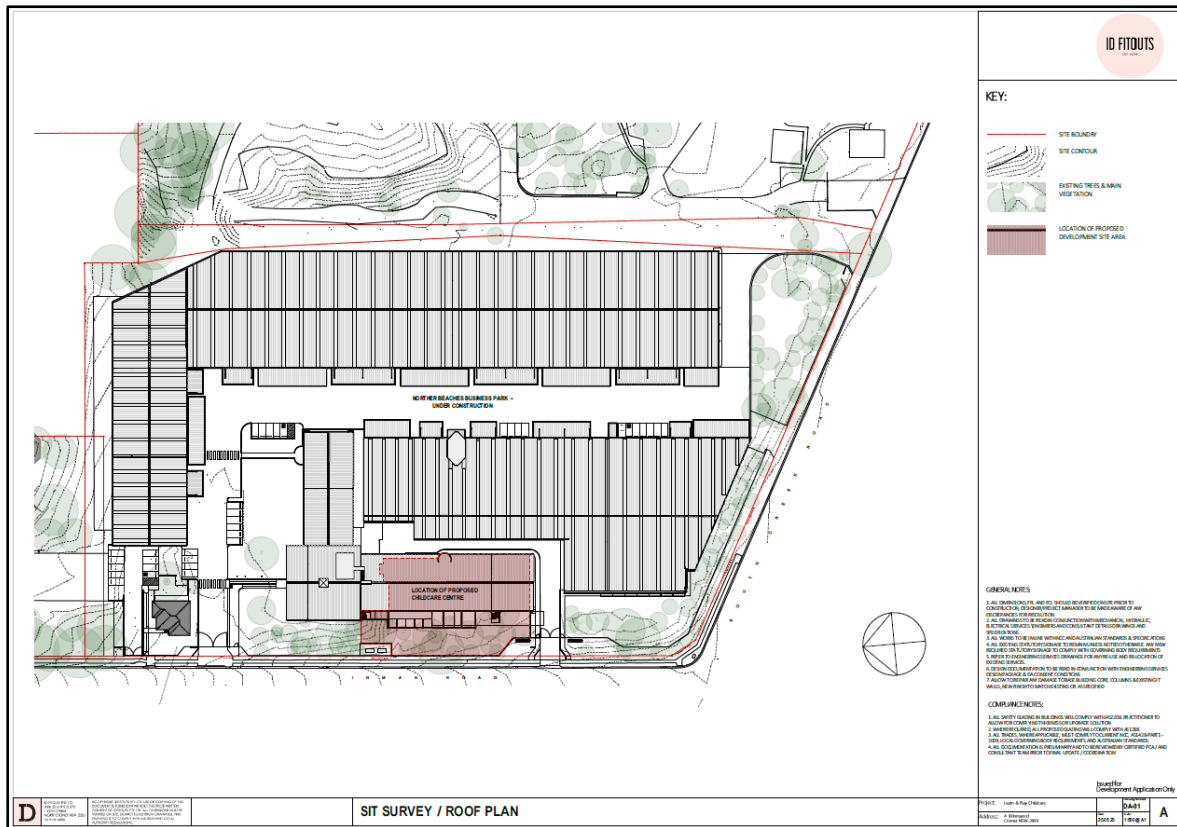


Figure 34. Existing Site Survey/Roof Plan

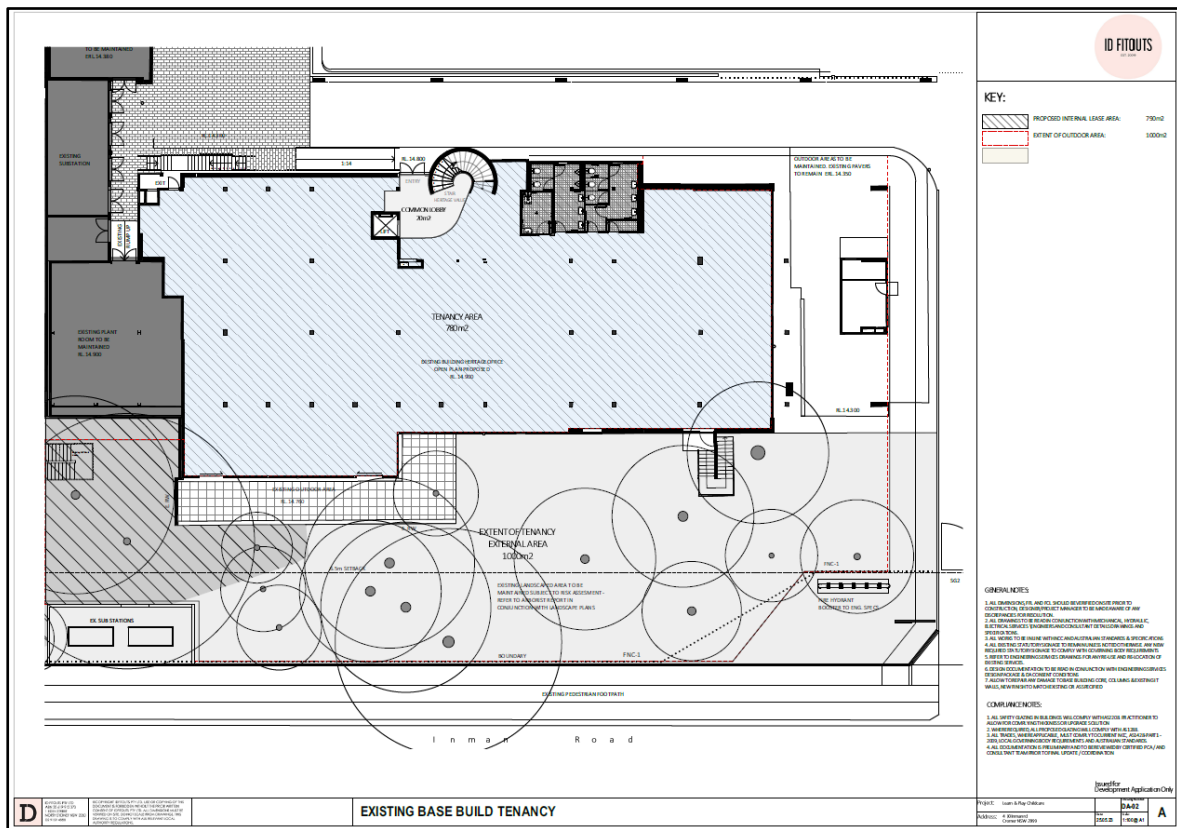


Figure 35. Existing Base Build Tenancy.

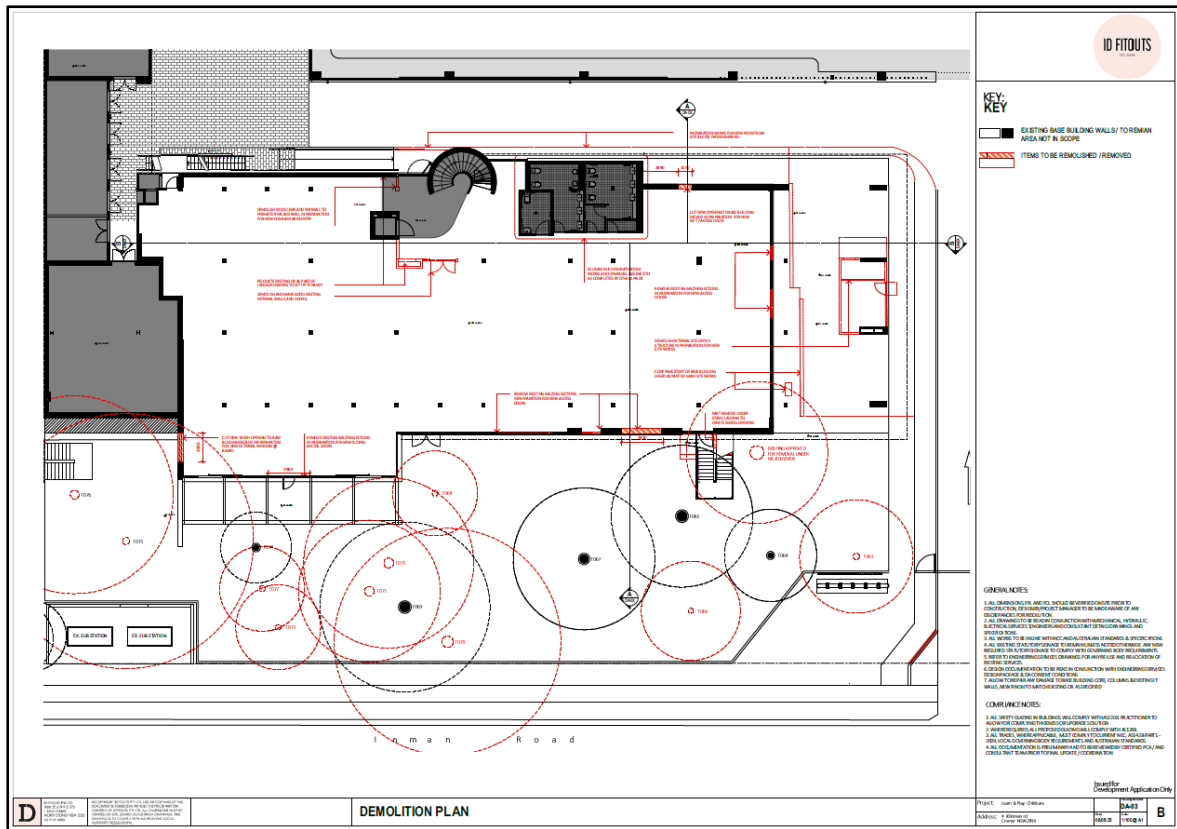


Figure 36. Proposed demolition plan.

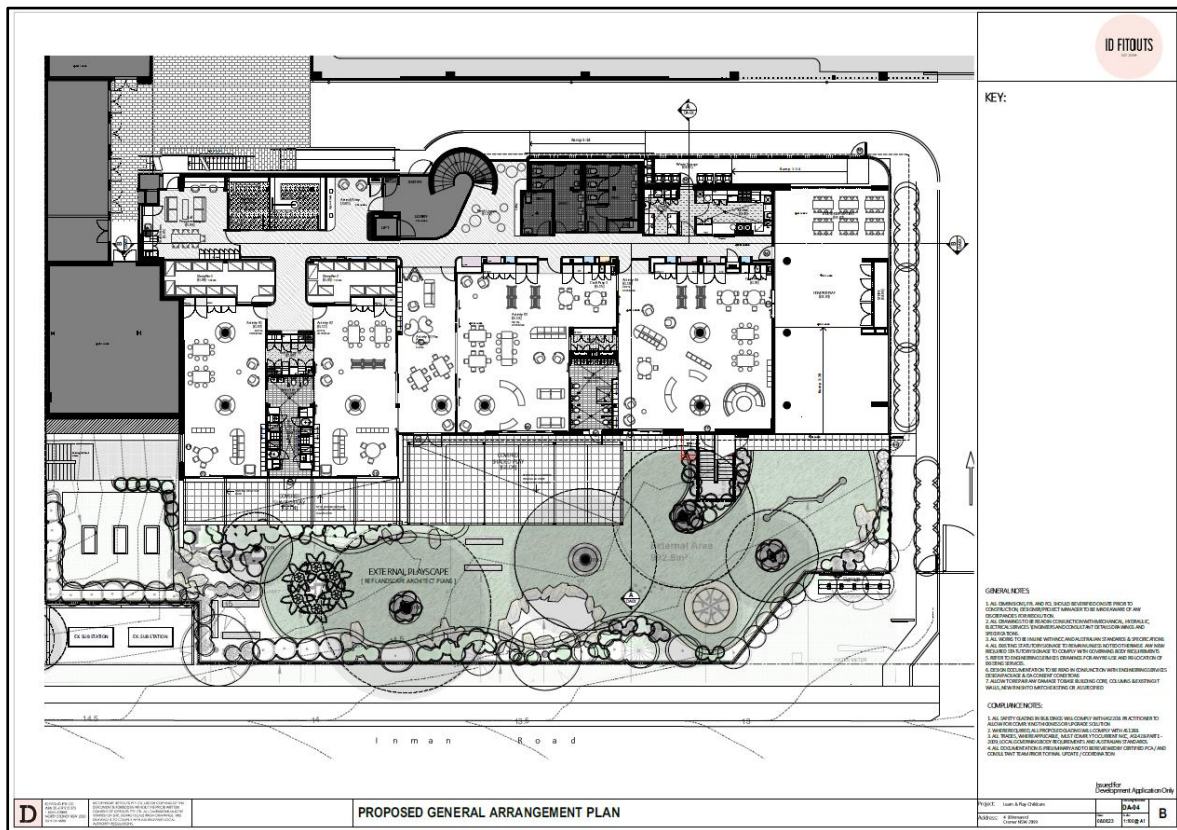


Figure 37. Proposed general arrangement plan.

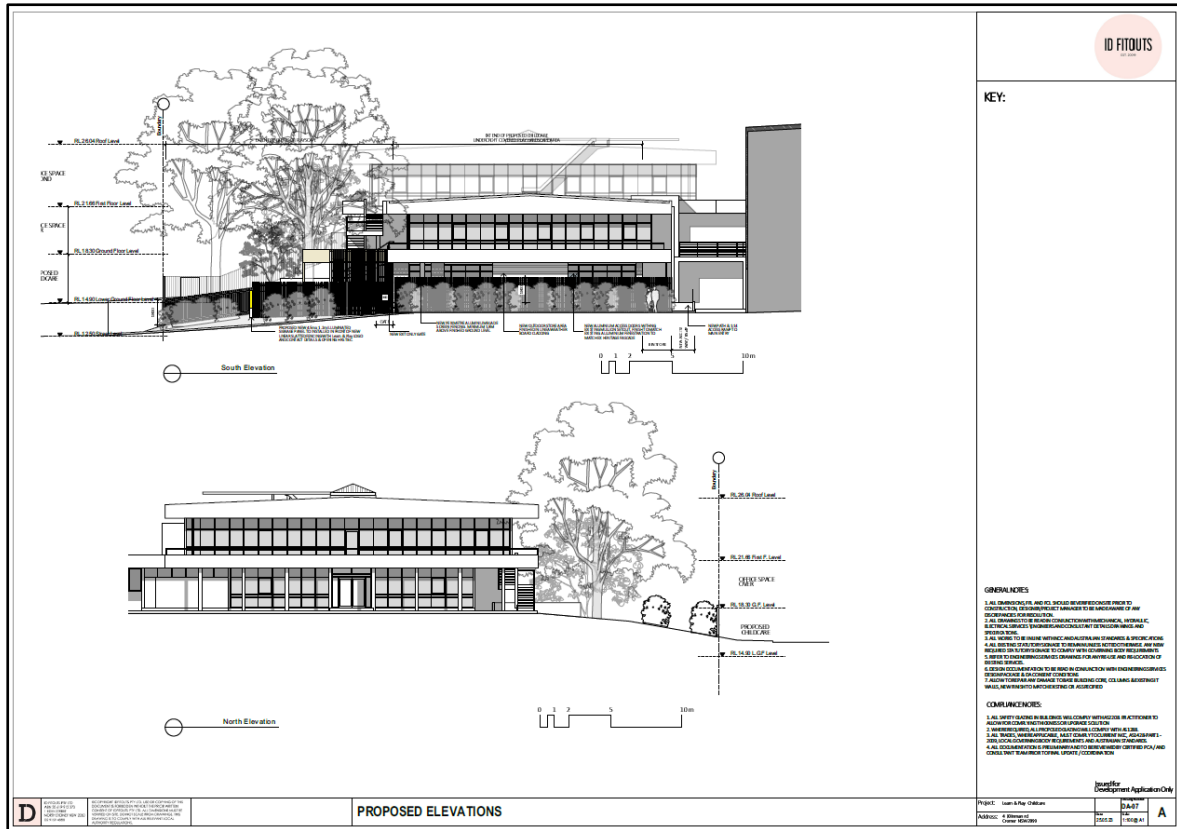


Figure 40. Proposed North and South Elevations.

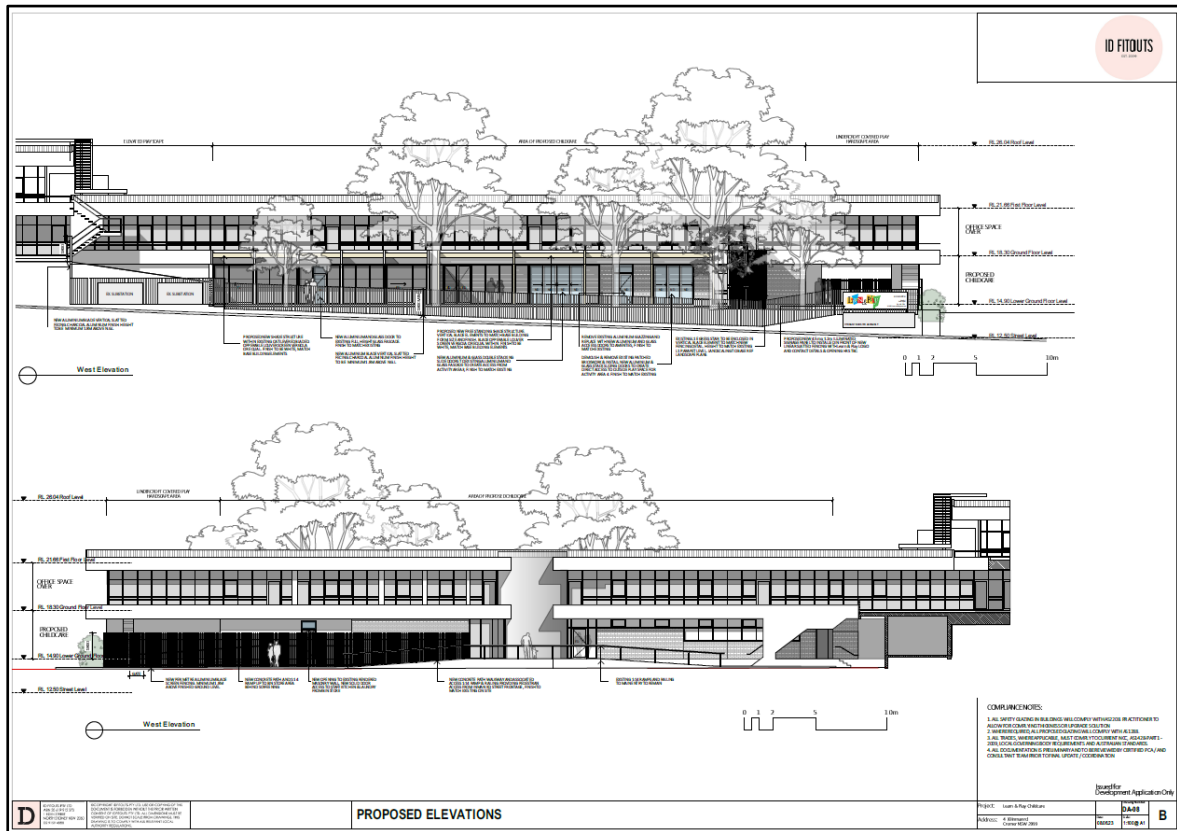


Figure 41. Proposed West Elevations.

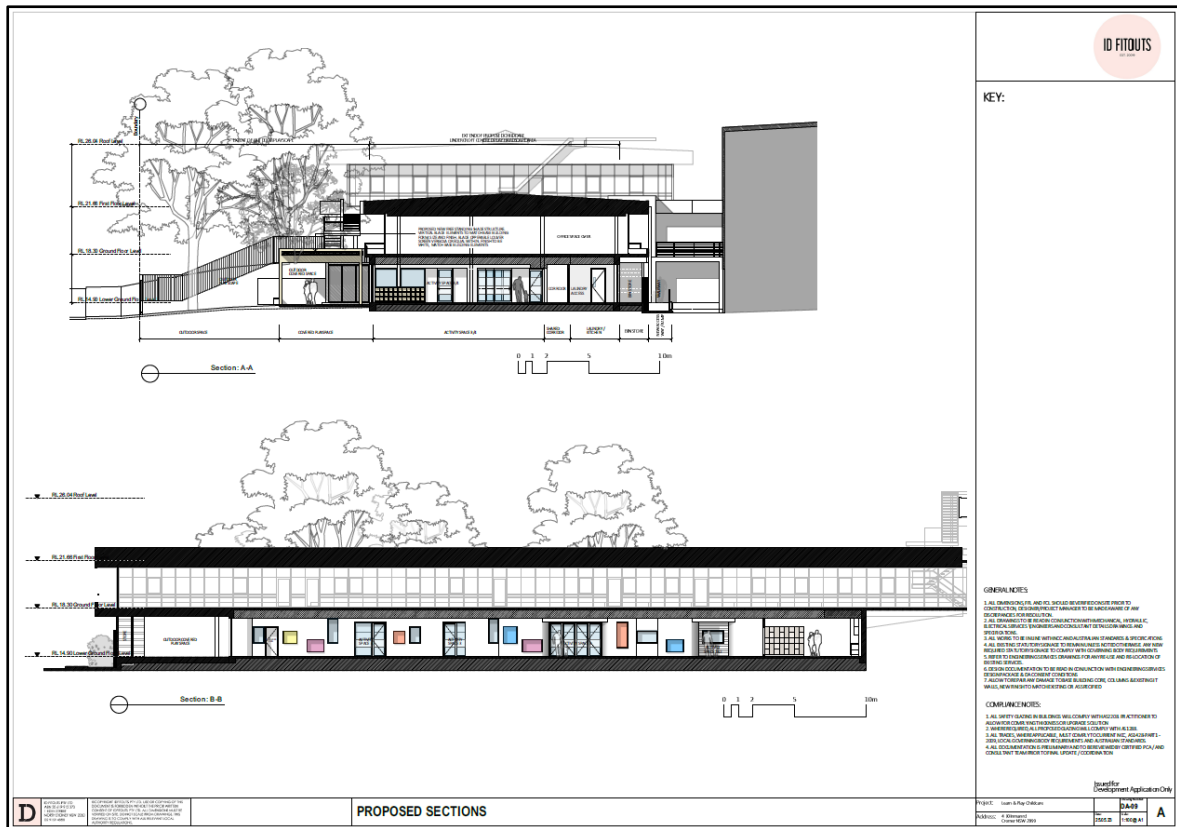


Figure 42. Proposed sections.

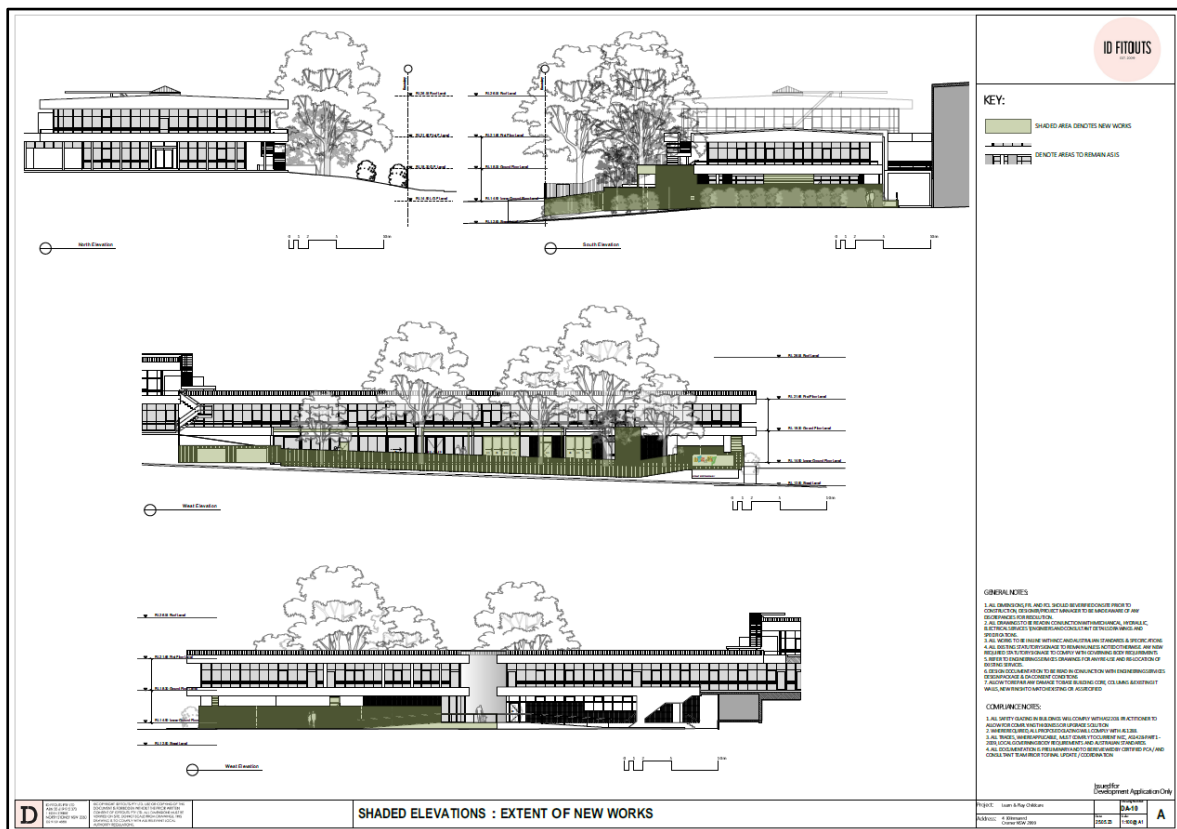


Figure 43. Shaded elevations showing the extent of new works.

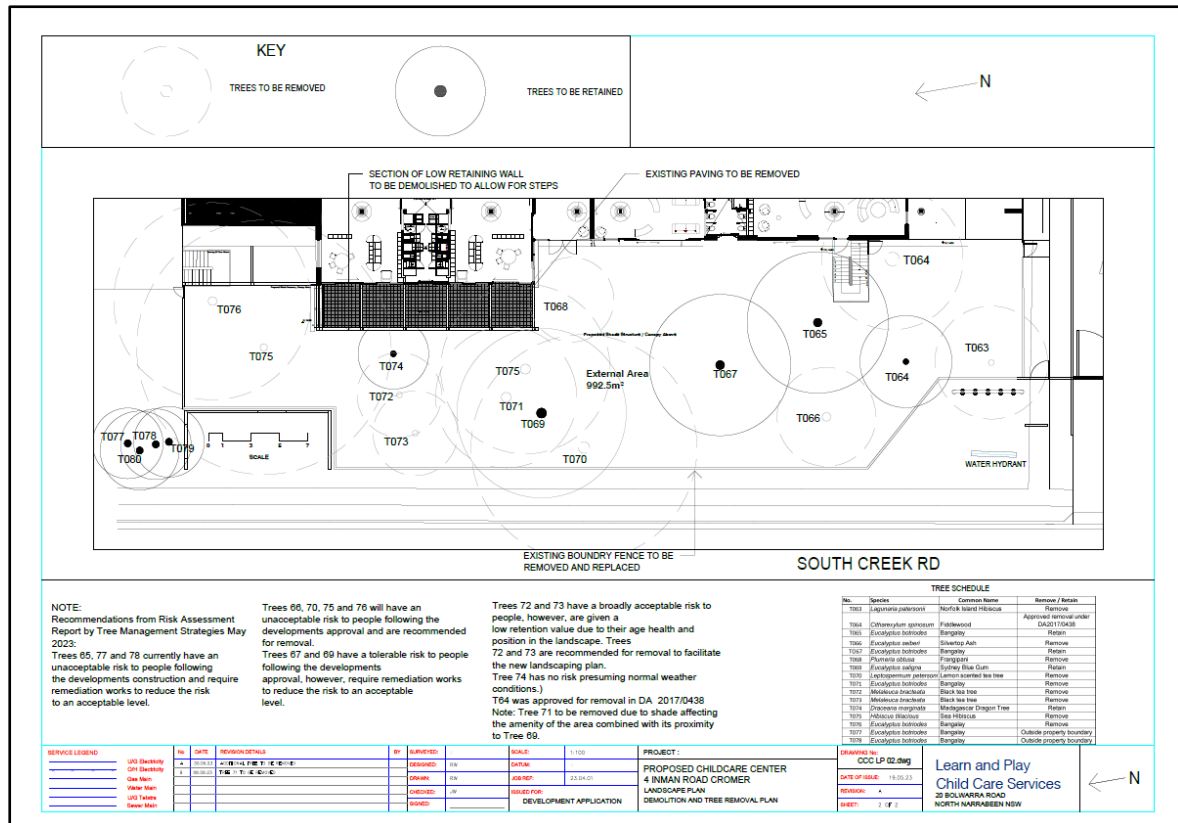


Figure 44. Landscape demolition and tree removal plan.

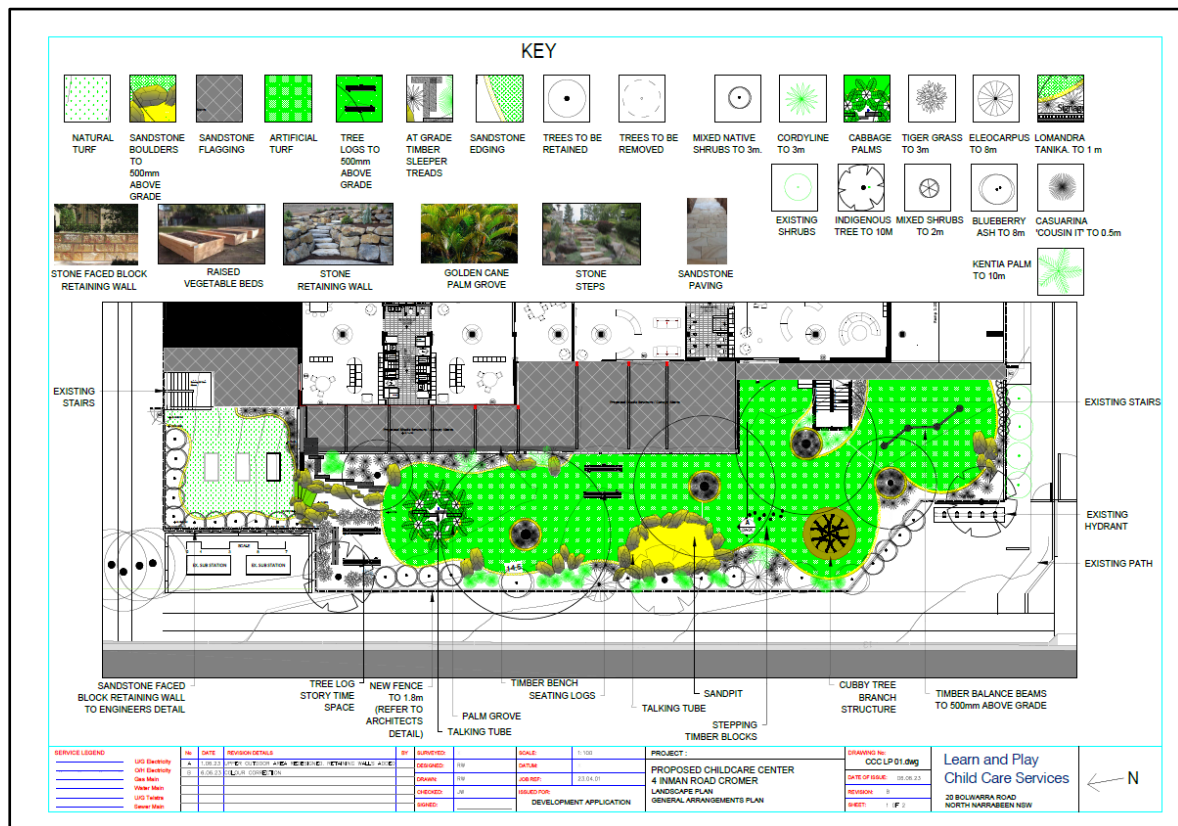


Figure 45. Proposed landscape plan showing the general arrangement.

6.0 ASSESSMENT OF HERITAGE IMPACT

6.1 Heritage Management Framework

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

6.1.1 Warringah Local Environmental Plan 2011

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

- (1) Objectives*
- (2) Requirement for consent*
- (4) Effect of proposed development on heritage significance*
- (5) Heritage assessment*
- (6) Heritage conservation management plans*
- (10) Conservation incentives*

6.1.2 Warringah Development Control Plan 2011

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

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

6.1.3 Conservation Management Plan – 100 South Creek Road, Cromer

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

- Section 7.0** – Constraints and Opportunities
- Section 8.0** – Development of Conservation Policies
- Section 9.0** – Conservation Policies

6.1.4 NSW 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.¹⁰ 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.

Minor partial demolition (including internal elements)

- *Is the demolition essential for the heritage item to function?*
- *Are important features of the item affected by the demolition (e.g. fireplaces in buildings)?*
- *Is the resolution to partially demolish sympathetic to the heritage significance of the item?*
- *If the partial demolition is a result of the condition of the fabric, is it certain that the fabric cannot be repaired?*

Change of use

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

Minor additions (see also minor partial demolition)

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

¹⁰ NSW Heritage Office, "Statements of Heritage Impact," in *NSW Heritage Manual* (Paramatta: Department of Planning and Environment, 1996), <https://www.environment.nsw.gov.au/research-and-publications/publications-search/statements-of-heritage-impact>.

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?*

Tree removal or replacement

- *Does the tree contribute to the heritage significance of the item or landscape?*
- *Why is the tree being removed?*
- *Has the advice of a tree surgeon or horticultural specialist been obtained?*
- *Is the tree being replaced? Why? With the same or a different species?*

6.1.5 Other Heritage Considerations

- Whether the historical use of the site would be maintained and if not, if the proposed new use would be suitable to the heritage significance; and
- Whether the historical setbacks and boundaries of the site would be retained as existing.

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 Impact Summary

The subject site of the former Roche 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 August 2020. A Section 4.55 application (Mod 2022/0452) was approved in December 2022 for alterations and removal of later addition internal fit-out within the heritage cottage (B5) and Buildings 01, 02 and 06.

The subject development application is for modifications to the existing building for a new childcare centre within the tenancy located on the lower ground floor of Building 06. The proposal would also include alterations and additions to the landscaped area located to the west of the subject tenancy, fronting Inman Road.

The proposed development would include minor demolition/removal of some sections of the glazing located along the western and southern façades of the tenancy to install new doors. The installation of these doors would be necessary for access purposes. The alterations to the western façade glazing would all be to later addition fabric and as such would not impact any fabric of high heritage significance. The removal of some sections of the glazing along the southern façade has been limited and most of the original glazing would be retained at the subject site. The southern façade is seen from the within the subject site and is obscured from the public domain. As such, the removal of some sections of the glazing would not alter the presentation of the heritage building from the public domain. The original curtain wall glazing would remain legible at the subject site.

The proposal would include the demolition of a later-addition site office located in the southern external area of the subject tenancy. This site office is a later addition and is of little heritage significance. As such, the demolition of this building would not negatively impact the heritage significance of the subject site. The proposed extension of the awning along the western façade would follow the design of the existing and would not obscure views to the original design detailing of the heritage building.

The proposal also include alterations to the landscaped area along the western boundary, fronting Inman Road. The proposal would include the removal of ten trees located within this landscaped area. The removal of these trees has been guided by the Risk Assessment Report prepared by the arborists Tree Management Strategies dated 01 May 2023. This report outlines that the trees proposed for removal have an unacceptable risk of harm due to deadwood, decay and are severely

declined. The trees have overgrown due to poor maintenance and would be a risk to people and the children in the proposed play area following development approval and are therefore recommended for removal. The proposal would retain the mature trees on site, ensuring that the green leafy setting and the landscape character of the subject site along Inman Road is maintained. The proposal also aims to improve the landscaping in this area by introduction of new landscaping features and elements. This would improve the presentation of the heritage building and views to this building from the public domain. The landscape area is cordoned off by a 1.8m high non-original metal fence which would be removed and replaced by an aluminium metal slat fence which would be similar to the existing and would not obscure views to the heritage building.

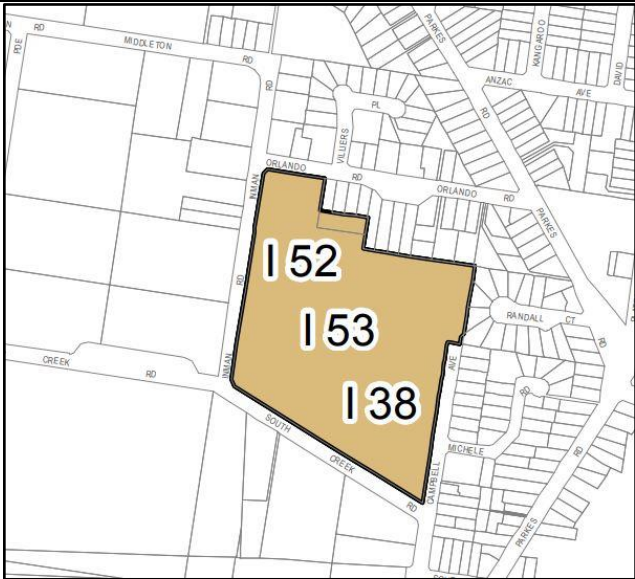
This application seeks to rely on the conservation incentives established by clause 5.10(10) of the *Warringah LEP 2011*. As mentioned above, the proposed development would include alterations and addition to the interiors of the heritage-listed building to accommodate a new childcare centre which would otherwise be prohibited within the current land zoning of the subject site: E4 General Industrial. The proposal would also include alterations to the landscaping. Heritage 21 is of the opinion that the subject proposal must be considered in its entirety on the basis that the heritage Building 06 was primarily constructed as office premises and is not fit for purpose as an industrial or warehouse building. The proposed childcare centre would ensure that heritage building would continue to be used and the changes would all be to fabric of little significance. The adjacent landscaped area would suit the requirements of a play area of a childcare centre. The proposed childcare centre would provide amenity to the users of the subject site as well as the people working in the Cromer industrial area. The provision of this amenity would be in line with the planning principle of the former Roche complex which was one of the first industrial sites that focussed on providing amenity and recreational spaces to its workers.

The proposal would retain the existing form, scale and bulk of Building 06 and would not alter the Modernist architectural style of the building. The works would mostly be located in areas of little significance and would not detract from the heritage significance of the subject site. Heritage 21 is confident that the proposal would have a neutral impact on the heritage significance of the heritage building. It is Heritage 21's opinion that the proposal satisfies the requirements of subclauses (a) to (e) of Clause 5.10(10) of the WLEP 2011 and should be viewed favourably by the Council for approval.

6.2.2 Impact Assessment against the WLEP 2011

The statutory heritage conservation requirements contained in Section 5.10 of the *Warringah LEP 2011* are pertinent to any heritage impact assessment for future development on the subject site. We assess the proposal against the relevant clauses below.

CLAUSE	ASSESSMENT
(1) Objectives	The proposal entails work to sites and places listed as heritage items under Schedule 5 of the <i>Warringah LEP 2011</i> . It is our general assessment that the proposed works are limited within the interiors to fabric of little significance and as such would not alter the height, scale, massing of the existing building. The proposed works (as detailed in Section 5.0 above) would not engender a negative impact on the heritage significance of the subject site and the heritage buildings of high significance located within the subject site, including their contributory fabric and general setting.
(2) Requirement for consent	This Development Application is lodged to Council to gain consent for the works proposed in the vicinity of heritage items listed under Schedule 5 of the <i>Warringah LEP 2011</i> .
(4) Effect of proposed development on heritage significance	This Statement of Heritage Impact accompanies the Development Application in order to enable the Northern Beaches Council, as the consent authority, to ascertain the extent to which the proposal would affect the heritage significance of the heritage items located in the vicinity of the site.
(5) Heritage assessment	
(10) Conservation incentives <i>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—</i>	<p>This application seeks to rely on the Conservation Incentives established by clause 5.10(10) of the WLEP 2011. It is noted that the subject site at 4-10 Inman Road, Cromer contains the Roche Building which is a heritage item listed under Schedule 5 of the WLEP 2011.</p> <p>Clause 5.10(10) of the WLEP 2011 states that consent may be granted by the consent authority to development for any purpose of a building that is a heritage item or of the land on which such a building is erected, even though the purpose would otherwise not be allowed under the WLEP 2011.</p>

CLAUSE	ASSESSMENT
	 <p>Figure 46. Detail from Heritage Map HER_009. The subject site is outlined in black and heritage items, are marked brown. (Source: NSW Legislation Online, accessed 1 June 2023, https://legislation.nsw.gov.au)</p> <p>The proposed development would include alterations and additions to the heritage-listed building to accommodate a new childcare centre which would otherwise be prohibited within the current land zoning of the subject site – E4 General Industrial. However, the proposal must be considered in its entirety on the basis that the subject heritage building 06 was primarily constructed as office premises and is not fit for purpose as an industrial or warehouse building. The proposed childcare centre would ensure that the existing heritage building would retain its existing form and would facilitate the use of the heritage building, ensuring that it would be retained within its existing setting. The proposal would also provide amenity to the workers of the Cromer Industrial area by the provision of a childcare centre.</p> <p>The consent authority can grant consent to the proposed development if it is satisfied that the requirements of subclauses (a) to (e) of clause 5.10(10) have been met.</p> <p>In our view the proposed development satisfies the requirements of subclauses (a) to (e) for the following reasons.</p>
<p><i>(a) the conservation of the heritage item or Aboriginal place of heritage significance is facilitated by the granting of consent, and</i></p>	<p>The proposed development is in accordance with this Statement of Heritage Impact, as a heritage management document. The proposed development also satisfies the conservation policies included in the Conservation Management Plan, prepared by Heritage 21, dated May 2019 and assessed by Council in the context of the previous development application DA2019/1346.</p> <p>As outlined above in Section 6.2.1 of this report, the proposal would not adversely impact the heritage significance of the subject site and would retain the heritage building in its existing form. The proposed changes to the</p>

CLAUSE	ASSESSMENT
	landscape in the western boundary would largely retain the landscape setting of the site and would improve the views and presentation of the heritage building along Inman Road.
<i>(b) the proposed development is in accordance with a heritage management document that has been approved by the consent authority, and</i>	The proposal would be in line with the conservation policies included in the Conservation Management Plan, prepared by Heritage 21, dated May 2019 and assessed by Council in the context of the previous development application DA2019/1346.
<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>	The consent authority may also impose suitable conditions on the development consent of the subject proposal to ensure that the proposed development follows the measures identified within the Conservation Management Plan.
<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>	As outlined above, the proposal would retain the existing form, bulk and scale of the existing building and the works would mostly be limited to the internal areas, consisting of fabric of little significance. The planning principle of the landscaping of the site would be largely retained by enhancing this setback area as a play area for the proposed childcare centre. The proposal would retain the mature trees on site and would only include the removal of the trees posing a threat due to decay and dead wood. As such, the landscape setting of the subject site would be retained. Heritage 21 is of the opinion that the proposal would have a neutral impact on the heritage significance of the subject site.
<i>(e) the proposed development would not have any significant adverse effect on the amenity of the surrounding area.</i>	<p>The proposed development would not have any significant adverse effect on the amenity of the surrounding area.</p> <p>The applicant has prepared an assessment of the proposed development addressing the amenity of the surrounding area, including the impacts associated with traffic and parking assessment. On that basis, the consent authority can be satisfied that the development would not have any significant adverse effect on the amenity of the surrounding area.</p> <p>Please refer to the Statement of Environmental Effects for a full assessment of the proposed development and its impact on the amenity of the surrounding area.</p>

6.2.3 Impact Assessment against the *Conservation Management Plan – 100 South Creek Road, Cromer, 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></p> <p><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 significant heritage buildings on site including Buildings 05, 01, 02 and 06. 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. The works would not alter the existing form, scale or bulk of Building 06 and would retain it within its existing setting as a part of the industrial complex. The proposal would largely retain the landscape setting along the western elevation and would only involve the removal of trees which have been assessed of causing a risk of harm in the Risk Assessment report prepared by the arborists Tree Management Strategies dated 1 May 2023. Minor alterations to the landscaped area would not alter the setting of the heritage building and would retain the heritage significance of the subject site.</p>
<p><i>Policy 4.1 – Expert Heritage and Conservation Advice</i></p> <p><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 within the interiors and the external walls, structure and curtain wall glazing of Building 06. The proposed fit-out for the childcare centre would be limited to the later addition fabric within the interiors of the building, ensuring that the heritage building retains its Modernist architectural style.</p>
<p><i>Policy 4.2 – Tradespeople</i></p> <p><i>All future works undertaken at the site should be carried out by suitably qualified and experienced tradespeople. Reference should be made to the Heritage Branch list of qualified tradespeople for each trade – refer to the Heritage Branch website.</i></p>	<p>Noted.</p>

<p><i>Policy 5.1 – Proposed Alterations to Fabric of High and Moderate Significance</i></p> <p><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 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.</i></p> <p><i>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>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 located within the interiors of Building 01 and 06. The works would not alter the form, scale or bulk of the heritage buildings ensuring that the buildings of high heritage significance are maintained within the former Roche complex. The proposed fit-out for the childcare centre would alter the original glazing walls located along the southern façade. The proposal would include removal of small sections of the curtain wall to install new doors along this façade. The new doors would be installed following the existing rhythm and pattern of the curtain wall, maintaining the heritage significance of the heritage item. The removal of minor sections of the curtain wall would not alter the external presentation of the building as viewed from the streetscape. The proposal would also largely retain the landscape setting along the western boundary.</p> <p>The proposal would limit the removal of the trees to the ones that are essential to be removal for the childcare development to function. Retaining the mature trees on site and improve the landscape setting by introduction of new features and details would improve this area and would retain the main design principle of the landscape design of the subject site.</p>
<p><i>Policy 5.2 – Proposed Alterations to Fabric of Little Significance</i></p> <p><i>Proposed changes to fabric identified in this CMP as being of ‘little significance’ may take place so long as it does not result in a reduction of the significance constituted in the elements and spaces identified in this report as possessing ‘high significance’. Demolition of such spaces or elements is generally permissible where appropriate. Any new work proposed to such spaces identified as possessing little significance should, wherever possible, be sympathetic to the original fabric and spaces.</i></p> <p><i>Any modification to fabric of little significance is to be subject to a formal Statement of Heritage Impact in accordance with the Heritage Branch guidelines.</i></p>	<p>The heritage offices in Buildings 01, 02, 06 have undergone multiple alterations over the years leading to the loss of 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 the heritage 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 proposed alterations to the landscaped area along the western boundary would largely retain the presentation of the subject site along Inman Road.</p> <p>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 tenancy within the lower ground floor of the heritage listed Building 06 and the alterations would mostly 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.

Question	Assessment
Minor partial demolition (including internal elements)	
<i>Is the demolition essential for the heritage item to function?</i>	The proposed demolition is not essential for the subject heritage building to function. However, the proposed partial demolition of the later-addition site office structure and removal of some sections of the curtain wall glazing wall would improve the amenity of the subject building and would facilitate the adaptive reuse of the space for the proposed childcare centre. The proposed demolition would not remove any heritage significant fabric and would have a neutral impact on the heritage significance of the subject site.
<i>Are important features of the item affected by the demolition (e.g. fireplaces in buildings)?</i>	The proposal would not impact any important features of the heritage building. The removal of some sections of the curtain wall glazing along the southern façade would still retain most of the original glazing, retaining the original presentation of the subject site. Minor openings within the walls for doors and windows would not alter the form or the design of Building 06.

<i>Is the resolution to partially demolish sympathetic to the heritage significance of the item?</i>	The proposed removal of sections of curtain wall glazing along the western façade would all be to later-addition fabric and as such would not impact the heritage significance of the site. The proposed removal of small sections of the glazing along the southern façade would be limited to one panel and as such would retain the fenestrations pattern of the original curtain wall glazing. Most of the works would be within the interiors in areas consisting of fabric of little significance. The proposal would retain the original curved stairs and as such would have a neutral impact on the heritage significance of the subject site.
<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 proposed partial demolition within the interiors of the tenancy is not a result of the condition of the fabric. The proposed alterations within the interiors of the space would aid in improving the amenity of the subject building ensuring that its adaptively reused as a childcare centre.
Change of use	
<i>Has the advice of a heritage consultant or structural engineer been sought? Has the consultant's advice been implemented? If not, why not?</i>	Heritage 21 has been a part of the consultant team since the beginning of the proposed childcare development project. They have provided heritage design to the design team which has been implemented within the proposal to ensure that the proposed development does not detract the heritage significance of the subject site and retains all heritage significant fabric. The proposal would retain the heritage significance of the subject site and would engender a neutral impact on its significance.
<i>Does the existing use contribute to the significance of the heritage item?</i>	Building 06 was originally designed as an office premises within the former Roche complex. The subject site has been a part of the major redevelopment project which has been approved and the subject site is currently being developed a business park consisting of various different tenancies and uses. The subject building ceased its original use as an office building when the former Roche factory stopped its functioning. The interiors of Building 06 are of an open plan and can accommodate different uses. The building is significant for its form, scale and Modernist architectural style rather than its use.
<i>Why does the use need to be changed?</i>	The subject site has had a development application approved for redevelopment of the site as a business park. The subject site consists of different tenancies with different uses. The subject tenancy of the proposed childcare centre is of an open plan within the interiors and also consists of the landscaped area along the western boundary. This would make is suitable for a childcare centre. Therefore, the use of the subject tenancy needs to be changed as it would be suitable for a childcare centre and would increase the amenity of the site.

<i>What changes to the fabric are required as a result of the change of use?</i>	As outlined above, the proposal would mostly be limited to later-addition fabric within the interiors of little significance. Minor alterations to the external glazing would allow for the installation of new doors and windows to the tenancy. The proposal would not negatively impact any heritage significant fabric.
<i>What changes to the site are required as a result of the change of use?</i>	The proposal aims to improve the condition of the poorly maintained landscape area along the western boundary which consists of overgrown trees with deadwood and failure due to decay. The proposed development would improve the condition of this landscaped area by the introduction of open play area. This would improve the setting of the site and improve its presentation along Inman Road.
Minor additions (see also minor partial demolition)	
<i>How is the impact of the addition on the heritage significance of the item to be minimised?</i>	The proposed alterations and additions would all be limited within the interiors of the tenancy and would not alter the existing form or scale of the heritage building. The subject building would retain its external presentation within the Inman Road streetscape and would continue to be recognised as the office building built within the former Roche Complex in the Modernist architectural style.
<i>Can the additional area be located within an existing structure? If no, why not?</i>	The proposed childcare centre would be limited within the interiors of the heritage building and would not include any additions that would alter the presentation of the existing structure. The existing landscape would continue to be retained as it would be used a play area for the childcare centre. The proposal would not include any additional area outside the existing boundaries of the subject tenancy.
<i>Will the additions visually dominate the heritage item?</i>	The proposed childcare centre would be limited within the boundaries of the subject tenancy located on the lower ground floor of Building 06. The works would all be within the interiors of the site and would not visually dominate the heritage item.
<i>Is the addition sited on any known, or potentially significant archaeological deposits? If so, have alternative positions for the additions been considered?</i>	An archaeological assessment is beyond the scope of this report. In saying so, the proposal would be limited to alterations and additions within the interiors of the lower ground floor of Building 06 and upgradation to the landscaped area along the western boundary. These works would not involve any subsurface excavation and as such would not impact any archaeology at the subject site.
<i>Are the additions sympathetic to the heritage item? In what way (e.g. form, proportions, design)?</i>	As mentioned above the proposal would not alter the external presentation of the heritage building. The building would retain its existing form, scale and detailing and as such would maintain its existing setting and significance within the subject site.

New landscape works and features (including carparks and fences)	
<i>How has the impact of the new work on the heritage significance of the existing landscape been minimised?</i>	The proposed works would all be located within the existing landscaped area along the western boundary which has not been maintained and is currently in a poor condition. The trees are overgrown. The trees have been assessed by the arborists for the project for the risk assessment in the report prepared by Tree Management Strategies dated 01 May 2023. Only the trees posing a risk to the proposal have been proposed to be removed. The proposal would retain the mature trees on site and would improve the setting of the subject site by introducing the landscape features along the western boundary.
<i>Has evidence (archival and physical) of previous landscape work been investigated? Are previous works being reinstated?</i>	Evidence of previous landscape has not been investigated. The historic aerials of the subject site do not provide concrete evidence that the area along the western boundary consisted of a specific landscaping design or strategy. Therefore, it would be difficult to reinstate historical landscape. The proposal would retain the sandstone boulders located at the subject site which might have been a part of the original landscape design. Heritage 21 is confident that the proposal would improve the setting of the subject site and would not engender a negative impact on the significance of the subject site.
<i>Has the advice of a consultant skilled in the conservation of heritage landscapes been sought? If so, have their recommendations been implemented?</i>	Heritage 21 does not purport to be an expert in heritage landscapes. However, Heritage 21 has provided advice for the proposed childcare development for the retention of the landscaped area along the western boundary. The proposal would retain the landscape setting of along the western boundary and would majorly alter the presentation of the subject site.
<i>Are any known or potential archaeological deposits affected by the landscape works? If so, what alternatives have been considered?</i>	An archaeological assessment is beyond the scope of this report. In saying so, the proposal would be limited to alterations and additions within the interiors of the lower ground floor of Building 06 and upgradation to the landscaped area along the western boundary. These works would not involve any subsurface excavation and as such would not impact any archaeology at the subject site.
Tree removal or replacement	
<i>Does the tree contribute to the heritage significance of the item or landscape?</i>	The trees located within the landscaped area along the western boundary were planted mostly likely as the industrial complex of Roche grew between 1965 and 1972. The area would be retained as a landscaped area in the proposal and as such would retain the design principle of the subject site. The trees do not appear to be a part of a specific historic plantation strategy.

<i>Why is the tree being removed?</i>	As mentioned above, the trees proposed for removal pose a risk to due to the decay and decline in their health due to poor maintenance. They would pose a risk to the proposed development and hence they are proposed to be removed.
<i>Has the advice of a tree surgeon or horticultural specialist been obtained?</i>	<p>Currently the landscaped area located along the western boundary of the subject site, fronting Inman Road is highly overgrown and has not been maintained.</p> <p>The proposed development has developed the new landscape plan after the careful consideration and recommendations provided in the Risk Assessment Report prepared by the arborists Tree Management Strategies dated 01 May 2023. This report outlines the trees that would cause significant risk to the proposed development due to severe decline in the tree conditions leading to deadwood, decay. The trees proposed for removal would have unacceptable risk of harm to the proposed childcare centre and would not be suitable within the landscaping of the proposed development. The proposal would aim to retain the landscape setting of the subject site fronting Inman Road.</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.¹¹

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 not alter the historic subdivision pattern in the Cromer locality.
- 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 building and would not alter the form, scale or bulk of the heritage building.
- The proposed retention of 06 would maintain the existing presentation of the Former Roche Facility to Inman Road and the immediate area.
- The proposed retention of majority of the 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. The neutral/positive impacts of the proposal have been addressed above in Section 7.1.1. Recommendations are provided in Section 7.2 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:

- Limiting the works pertaining to the childcare centre within the interiors of the tenancy and not altering the external form of the building. The original design of the proposed kitchenette which was extending beyond the southern façade of the building has been altered to ensure that the significant curtain wall glazing is retained.
- Retention of the original form of Building 06 and not altering the external presentation of the subject building.

¹¹ NSW Heritage Office, "Statements of Heritage Impact."

- Retention the significant sandstone boulders within the proposed landscaping as they might have been a part of the original landscaping of the subject site.

No solutions of greater sympathy with the significance of the subject site have been discounted to our knowledge.

7.2 General Conclusion

The proposal seeks to make use of the conservation incentives clause 5.10(10) as outlined in the *Warringah LEP 2011* in order to introduce a childcare centre at the subject site which would otherwise be prohibited within the current land zoning of the subject site: E4 General Industrial. The proposed development would aid in improving the existing condition and facilitate conservation works of the significant fabric of Building 06 and would retain the building in its existing bulk, scale and form. The assessment carried out in this report has found that the 5-part test of the conservation incentives clause has been satisfied and the proposal would not engender any negative impact on the heritage significance of the subject site.

The new development would comprise of a sympathetic design, scale, form and materiality. Heritage 21 has been actively involved in the design process to minimise the visual impact of the proposed development and to ensure that it would not detract the significance of the subject site. Heritage 21 is therefore confident that the proposed development complies with pertinent heritage controls and would not engender a negative heritage impact on its heritage significance. We therefore recommend that the Northern Beaches Council view the application favourably on heritage grounds.

8.0 SOURCES

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