

# **HERITAGE IMPACT STATEMENT**

## **STOCKTON RIFLE RANGE**

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# EXECUTIVE SUMMARY

Urbis has been engaged by Defence Housing Australia (hereafter DHA) to prepare the following Heritage Impact Statement to accompany a Planning Proposal for Stockton Rifle Range

The site has no associated heritage listings. However, it does comprise two items with some heritage significance, being the Links Anti-Aircraft Battery (hereafter Links Battery) which is located near the northern boundary of the site and the remnants of the 1000yd Firing Range which constitutes semi cleared tracks extending south from the central track at 100yd intervals, now largely overgrown. The subject site is also located in the general vicinity of the Stockton Beach Dune System (item 34) as identified in the Port Stephens Local Environmental Plan 2013.

As part of a consultant team appointed to develop a master plan for the subject site, Urbis has been engaged to prepare this Heritage Impact Statement to assess the heritage impact of the planning proposal on the identified heritage values associated with the site.

The planning proposal presents an opportunity to invigorate a presently underutilised site. The area to be rezoned is resultant of extensive and concurrent site investigations which have identified the significant values associated with the site. These values relate to built heritage, Indigenous archaeology and ecology among others. The investigations into sensitive areas comprising these values have facilitated the identification of the most appropriate area for redevelopment on the site. This area constitutes the western portion of the site, not including the area along the northern boundary. It is within this area that rezoning is proposed.

The land use and maximum height of building rezoning would facilitate future development of the area currently occupied by the remnants of the 1000-yard firing range. There is no built fabric remnant from this element (such as the original target mantlets and stop butts) which now presents as a series of semi cleared tracks at 100yd intervals. The element has been identified as having little conservation value (GML 2008) and is in a constantly deteriorating condition as the tracks become more overgrown. It is considered that heritage interpretation in the context of future residential development in this area would be more effective in communicating the sites former use than the retention of the element in its current condition.

It is appreciated that the planning proposal does not facilitate any future development in the area occupied by the Links Battery in addition to that which is permissible under the existing planning controls. As the Links Battery constitutes the only remnant built fabric with a connection to the sites historic use, it is considered that the planning proposal would be sympathetic to the most significant and intact fabric comprised in the site in terms of built heritage.

It is considered that the application of the new zoning across the site and the proposed maximum building heights would be appropriate in ensuring that the new development does not visually dominate or detract from the remnant fabric of the Links Battery. A full assessment of visual impact would be undertaken as part of a future application for the development of the rezoned land.

In accordance with the above and the observations set out in this report, the Planning Proposal is supported from a heritage perspective.

The indicative Master Plan addressed herein has been developed to illustrate a potential product of the planning proposal. It is considered that the indicative Master Plan conserves the heritage significance of the site which is largely vested in the remnant Links Battery and allows for the interpretation of the original firing range markers. Further development of the indicative Master Plan is supported.

## RECOMMENDATIONS

The following recommendations have been set down to guide the next stages of the process including the design development of a proposed master plan:

- Note that at the time of inspection (May 2016) the Links Battery was severely overgrown and essentially inaccessible. The areas accessed indicate that it is in poor condition. Subsequent development applications and works on the site should ensure future repair and maintenance of the Links Battery. Specifically, the item should be stabilised, repaired where necessary and appropriately conserved. Clearing the vegetation will allow for the identification of opportunities to heritage list the item in the future and/or incorporate the item into an Interpretation Plan for the site; and

- An Interpretation Strategy should be prepared in conjunction with the master planning for the site. The site of the battery could be considered for the location of interpretative devices which communicate the historic values associated with the site.

# 1. INTRODUCTION

## 1.1. BACKGROUND

Urbis has been engaged by Defence Housing Australia (hereafter DHA) to prepare the following Heritage Impact Statement to accompany a planning proposal for Stockton Rifle Range which is located on Popplewell Road, Fern Bay.

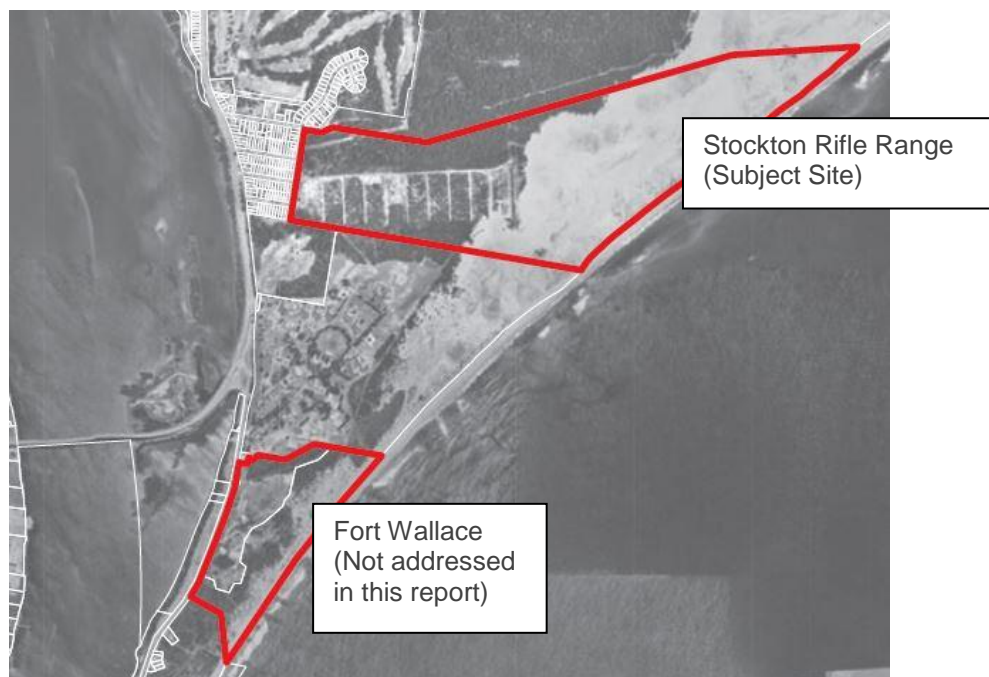
As part of a consultant team appointed to develop a master plan for the subject site, Urbis has been engaged to prepare this Heritage Impact Statement to assess the heritage impact of the planning proposal on the intrinsic heritage values associated with the site.

The site has no associated heritage listings. However, it does comprise two items with some heritage significance, being the Links Anti-Aircraft Battery (hereafter Links Battery) which is located near the northern boundary of the site and the remnants of the 1000yd Firing Range which constitutes semi cleared tracks extending south from the central road at 100yd intervals, now largely overgrown. The subject site is also located in the general vicinity of the Stockton Beach Dune System (item 34) as identified in the Port Stephens Local Environmental Plan 2013.

## 1.2. SITE LOCATION

The entire site which is located on Popplewell Road, Fern Bay (Figure 1) borders Stockton Beach to the east. The site is legally known as Lot 5, DP233358. Stockton Rifle Range is located to the north of Fort Wallace which is also planned for rezoning. Fort Wallace will be assessed in a separate document. For the purposes of this report the “subject site” refers only to Stockton Rifle Range.

Figure 1 – Map indicating the location of the subject site (Stockton Rifle Range) and Fort Wallace to the south.



Source – Architectus Draft Masterplan Report

## 1.3. METHODOLOGY

This Heritage Impact Statement has been prepared in accordance with the NSW Heritage Branch guideline ‘Assessing Heritage Significance’ (2001) and the Commonwealth Heritage Criteria. The philosophy and process adopted is that guided by the *Australia ICOMOS Burra Charter* 1999 (revised 2013).

The planning proposal has been discussed herein with reference to the identified significance of the remnant elements on site.

The indicative master plan has been briefly assessed with reference to the obligations arising from heritage significance set down by Urbis in June 2016. This is a preliminary assessment only to demonstrate how the application of development facilitated by the planning proposal could be sympathetic to the heritage significance of the place.

Stockton Rifle Range is located to the north of Fort Wallace which is also planned for redevelopment. Fort Wallace will be addressed in a separate assessment. For the purposes of this report the “subject site” refers only to the Rifle Range.

## **1.4. LIMITATIONS**

The Heritage Assessment prepared for the Rifle Range site by GML Heritage in January 2008 identified a total of 9 built heritage items. However, during Urbis’ site visit on 22 May 2016 the only items identified as extant at the Rifle Range site were the Links Battery and the 1000yd Firing Range; none of the other nine items were able to be located on site. It appears that all other elements have been removed, have become ruinous and/or have been buried under sand/vegetation.

As such Urbis has recommended that an historical archaeologist is engaged to assess the potential for remnants of these items to be present on site, verify their presence or absence, and develop an appropriate methodology for their management and/or treatment with regards to their identified heritage significance.

In accordance with the above this report addresses only potential heritage impacts on the Links Battery and the remnants of the 1000yd Firing Range. No Indigenous or historic archaeology has been considered in the preparation of this report.

Note that at the time of inspection (May 2016) the Links Battery was severely overgrown and essentially inaccessible. The areas accessed indicate that it is in poor condition. Subsequent development applications and works on the site should ensure future repair and maintenance of the Links Battery. Specifically, the item should be stabilised, repaired where necessary and appropriately conserved. Clearing the vegetation will allow for the identification of opportunities to heritage list the item in the future and/or incorporate the item into an Interpretation Plan for the site.

The 1000yd Firing Range is also severely overgrown and not easily apparent from ground level as it essentially constitutes cleared tracks extending south from the central track. The layout of the range is most easily apparent in aerial imagery.

## **1.5. AUTHOR IDENTIFICATION**

The following report has been prepared by Alexandria Barnier (Senior Consultant – Heritage).

Unless otherwise stated, all drawings, illustrations and photographs are the work of Urbis.

The following document has been referenced in the preparation of this document:

- Stockton Rifle Range prepared by Godden Mackay Logan in January 2008.

## **1.6. THE PROPOSAL**

This report provides an assessment of the heritage impact of the planning proposal for the land known as the Rifle Range located on Popplewell Road, Fern Bay. The application proposes to amend the existing land use zoning and maximum height of buildings controls that relate to the site.

The north eastern portion of the site and the area along the northern boundary including the area occupied by the Links Battery is proposed to retain the existing zoning E2 – Environmental Conservation. The zoning of part of the south western portion would be zoned R3 – Medium Density Residential.

The proposed maximum building height in the south western portion of the site varies from 9m to 15m.





## 2. SITE DESCRIPTION

Stockton Rifle Range is located on the Stockton Peninsula, 6 kilometres northeast of the Newcastle CBD and 4 kilometres north of the Stockton Township. It is located within Port Stephens Local Government Area. The site occupies 111 hectares in area and is bounded by Fullerton Road to the west and Stockton Bight to the east. The site is generally flat but is higher to the east. The sand dunes to the east of the site vary in stability in accordance with the level of ground cover.

The site extends from Stockton Beach in the east to Popplewell Road in the west. The topography of the land has been much altered as a result of the construction of the range, WWII weapons testing, post war remediation and sandmining.

The subject site is generally in poor condition and largely void of any built features. It is dominated by sandy tracks, grasses and shrubs. The north and south boundaries of the site have more dense vegetation including trees. There is a clear track down the centre of the site which is now used for access and south from this extends firing markers at 100 yard intervals which were originally part of the 1000yd firing range. These firing markers are not identifiable by anything other than the absence of vegetation which is more obvious in aerial view than from the ground. It is noted that vegetation is beginning to reclaim these clear areas after which the Firing Range will not be visible from the ground or in aerial view.

Figure 3 – General images of the Rifle Range.



Picture 1 – View east from the front gate to Popplewell Road.



Picture 2 – View west across the Rifle Range from the beach.



Picture 3 – View along the eastern boundary of the site.



Figure 4 – General images of the Rifle Range.



Picture 4 – View down one of the overgrown markers associated with the 1000 yard Firing Range.

Built evidence of only one of the nine site elements recorded in 2008 by the GML report appears to remain on site. It appears that all other elements have been removed, have become ruinous and/or have been buried under sand/vegetation. In particular, the GML 2008 report shows that the 20mm Accuracy Range observation hut was largely obscured by sand by that time, it is now completely covered by sand if not removed. The only remnant evidence of occupation identifiable on the site constitutes the Links Anti-Aircraft Battery and the semi clear areas of land which served as the markers for the 1000 yard Firing Range.

Aerial imagery indicates that the remnant Links Battery consists of four concrete gun emplacements and a central command post in a standard layout. The Links Battery is accessed by a now overgrown small ancillary track running north from the central spine. The Links Battery is in a ruinous condition and is surrounded by metal fencing.

The 1000 yard Firing Range is identifiable in aerial imagery. No built remnants of the range were located during the site visit. The range presents as 10 semi clear, partly raised, arms of land which extend from the central road from Popplewell Road to the dune system. The range has been progressively overgrown over time.



Figure 5 – Visible part of the Links Anti-Aircraft Battery.



Picture 5 – View towards part of the Anti-Aircraft Battery.



Picture 6 – View towards part of the Anti-Aircraft Battery.



Picture 7 – View towards part of the Anti-Aircraft Battery (image curtesy of client).



Picture 8 – View towards part of the Anti-Aircraft Battery (image curtesy of client).

Figure 6 – 2010 aerial imagery showing the location of the Links Battery and the firing markers of the 1000 yard Rifle Range extending from the central track.



Source – [nearmaps.com.au](http://nearmaps.com.au)

### 3. HISTORICAL OVERVIEW

The below history of Stockton Rifle Range has been summarised from the Stockton Rifle Range Heritage Assessment prepared by Godden Mackay Logan January 2008. Refer to that document for a comprehensive history. Where relevant to the proposed master plan this history has been variously augmented.

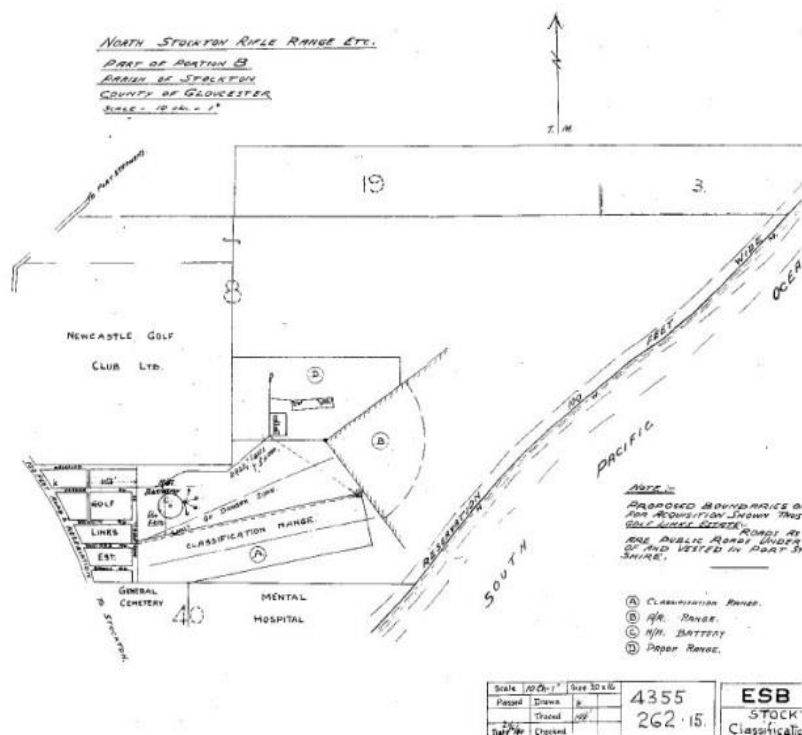
#### 3.1. SITE HISTORY

The Rifle Range is sited on land which was part of James Mitchell's purchase from the Crown in 1837. Mitchell was a local businessman., buying up much of Stockton and the land south of Newcastle CBD. Mitchell established various business in the region including a saltworks and a foundry however the Rifle Range remained undeveloped until it was acquired by the Commonwealth.

The Commonwealth acquired the site in 1942 for the purpose of constructing facilities for a classification range due to the demand for rifle shooting that the Adamstown Rifle Range could not meet. The topography of the site was heavily altered as it was not considered suitable for shooting however it did offer an adequate 'free danger zone' through the sand dunes. The site was used variously by military personal throughout WWII.

The range was constructed as a classification range of 50 targets in a concrete gallery, firing mound at 900 yards, a telephone service, wind flags, storage facilities and workshop. Construction began two years before the site was formally acquired and the range was opened for use in 1941. However by April 1941 funds for continued construction on the site ran out and several buildings were left incomplete. Construction began in 1942 again under the Unemployment Relief Works Program.

A series of upgrades were undertaken from 1942 as a result of the arrival of two new types of fighter planes from Britain which were ordered to oppose the Japanese over Darwin. These planes utilised 20mm Hispano Cannons. New firing ranges were required to test these weapons and in response the Stockton range was equipped with a 20mm Accuracy Range.



Picture 9 – Plan showing WWII uses of the site (Source National Archives of Australia GML Heritage Assessment)



The remnant Links Battery was established on the site to the north of the classification range. It comprised four Vickers 3.7 inch anti-aircraft guns and was completed around 1940. The name was drawn from its proximity to the Golf Links. It consisted of four gun emplacements and a central command post in a standard layout. The battery contributed to the Newcastle Fortress coastal defence system against air bombardment and particularly to protect Fort Wallace. A report by Gibson Nominees noting practice shoots (1942 and 1943) indicates that the battery was constructed by 1942.

Both Stockton and Adamstown remain in use after the war. However, the practicality of Adamstown was still questionable and attempts were made to close it down. Post War remediation works at Stockton were complete in 1953 and in the same year Adamstown was finally closed. From 1953 the range was used by military personnel, the police force, the RAAF and civilian rifle clubs.

The site continued as a working rifle range until it became unoccupied in 1997 as it was no longer required by the military.

The site was acquired by Defence Housing Australia in 2015 when it was purchased from the Department of Defence.

## 4. HERITAGE SIGNIFICANCE

### 4.1. WHAT IS HERITAGE SIGNIFICANCE?

Before making decisions to change a heritage item, an item within a heritage conservation area, or an item located in proximity to a heritage listed item, it is important to understand its values and the values of its context. This leads to decisions that will retain these values in the future. Statements of heritage significance summarise a place's heritage values – why it is important, why a statutory listing was made to protect these values.

### 4.2. COMMONWEALTH AND NSW HERITAGE CRITERIA

The Commonwealth Heritage Criteria of the EPBC Regulations and their correlating NSW criteria have been set out below. The following assessments of heritage significance set out below in this section have been prepared with reference to the Commonwealth Heritage Criteria or the Heritage Brand Criteria where relevant.

Commonwealth Heritage Criteria	Equivalent NSW Heritage Branch Criteria
<b>A:</b> The place has significant heritage value because of the place's importance in the course, or pattern, of Australia's natural or cultural history	<b>A – Historical Significance</b> <i>An item is important in the course or pattern of the local area's cultural or natural history.</i>
<b>B:</b> The place has significant heritage value because of the place's possession of uncommon, rare or endangered aspects of Australia's natural or cultural history	<b>F – Rarity</b> <i>An item possesses uncommon, rare or endangered aspects of the local area's cultural or natural history.</i>
<b>C:</b> The place has significant heritage value because of the place's potential to yield information that will contribute to an understanding of Australia's natural or cultural history	<b>E – Research Potential</b> <i>An item has potential to yield information that will contribute to an understanding of the local area's cultural or natural history.</i>
<b>D:</b> The place has significant heritage value because of the place's importance in demonstrating the principal characteristics of:  -a class of Australia's natural or cultural places; or  -a class of Australia's natural or cultural environments;	<b>G – Representative</b> <i>An item is important in demonstrating the principal characteristics of a class of NSWs (or the local area's):  cultural or natural places; or  cultural or natural environments.</i>
<b>E:</b> The place has significant heritage value because of the place's importance in exhibiting particular aesthetic characteristics valued by a community or cultural group	<b>C – Aesthetic Significance</b> <i>An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the local area.</i>



<b>Commonwealth Heritage Criteria</b>	<b>Equivalent NSW Heritage Branch Criteria</b>
<b>F:</b> The place has significant heritage value because of the place's importance in demonstrating a high degree of creative or technical achievement at a particular period	<b>C – Aesthetic Significance</b> <i>An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the local area.</i>
<b>G:</b> The place has significant heritage value because of the place's strong or special association with a particular community or cultural group for social, cultural or spiritual reasons	<b>D – Social Significance</b> <i>An item has strong or special association with a particular community or cultural group in the local area for social, cultural or spiritual reasons.</i>
<b>H:</b> The place has significant heritage value because of the place's special association with the life or works of a person, or group of persons, of importance in Australia's natural or cultural history	<b>B – Associative Significance</b> <i>An item has strong or special associations with the life or works of a person, or group of persons, of importance in the local area's cultural or natural history.</i>
<b>I:</b> The place has significant heritage value because of the place's importance as part of Indigenous tradition	Covered by the NPW Act.

## 4.3. ASSESSMENT OF HERITAGE SIGNIFICANCE – COMMONWEALTH VALUES

The below assessment of significance has been partly sourced from the GML Heritage Assessment of the Rifle Range and has been variously altered as necessary.

<b>Criteria</b>	<b>Significance Assessment</b>
<b>A – Processes</b>	<p>The Rifle Range is historically associated with Australia's WWII effort. The previous structures which are now not visible/present on the site were reminders of the training facilities and the opposition of the Japanese on home soil.</p> <p>However, there is little remnant built evidence of this except the Links Battery located near the northern boundary and the 1000yd Firing Range discussed below. These elements are minimally visible and appear to be in poor condition. As such, the historic use of the site as a Rifle Range is no longer easily apparent.</p> <p>While the Links Battery itself is part of a network of related weapons along the east coast built to protect the Newcastle area against attack it is not known to be associated with any particular significant historical event.</p> <p>The 1000yd Firing Range constitutes evidence of the history of rifle shooting on the site and in Newcastle generally. The layout of the Firing Range is evident in aerial imagery however minimally</p>

Criteria	Significance Assessment
	<p>identifiable on ground level given it constitutes lengths of previously cleared land which are now becoming overgrown. Its contribution to an understanding of the site is therefore diminished and it is considered to have little conservation value.</p> <p>Attributes</p> <p>The remains of the Links Anti-Aircraft Battery and the 1000 yard range.</p>
<b>B – Rarity</b>	<p>It is understood that the Firing Range was the only 50 target range of that size by the time it closed in 1996. However, there are ranges known to be of a similar size extant in NSW and Australia today. The range is also not considered to be a good example of the type as there is no apparent associated built fabric remnant (including targets) and the firing markers are badly overgrown in places obscuring the layout of the range.</p> <p>Attributes</p> <p>The remains of the 1000 yard range.</p>
<b>D – Representativeness</b>	<p>The Links Battery and the 1000 yard Firing Range constitute the last visible evidence of the WWII activities on the site and do have some potential to demonstrate its role in the history of the defence of Newcastle. Notwithstanding as they appear to be in poor condition their representative value is diminished.</p> <p>Attributes</p> <p>The remains of the Links Anti-Aircraft Battery and 1000 yard Firing Range.</p>

## 4.4. STATEMENT OF SIGNIFICANCE

It is considered that the subject site does not reach the threshold for Commonwealth listing on built heritage grounds.

The Links Battery constitutes the only significant built element remnant on the site and has a historic association with Australia's WWII effort. Further it is part of a network of defence installation along the coast constructed for the purpose of protecting Newcastle from air attacks. Notwithstanding, the fabric appears to be in very poor condition, likely requiring a range of remediation works and it is understood that the gun emplacements have largely been demolished. Further, the item is not known to be associated with any significant historical event and is one of a number of similar facilities constructed in Newcastle and NSW generally.

The 1000yd Firing Range has some significance as it is associated with the historic use of the site. However, no associated built fabric was identified on site (such as the original target mantlets and stop butts) and the firing markers are badly overgrown in many places obscuring the layout of the range from the ground plane. Accordingly, it is not considered to make a notable contribution to an understanding of the site and does not reach the requisite level of significance for local listing.

## 4.5. CONCLUSION

As above, it is not considered that the item meets the requisite threshold of significance for Commonwealth Heritage listing.

Further, given the very poor condition of the 1000yd Firing Range it is not considered that it reaches the threshold of significance for local listing. It is possible that the Links Battery meets the threshold for local listing. However, it is recommended that the vegetation is completely cleared from the site such that the condition and significance of the site can be properly assessed, and the site can be recommended for local listing in the future if appropriate.

## 5. IMPACT ASSESSMENT

### 5.1. HERITAGE LISTING

Stockton Rifle Range has no heritage listings relevant to built heritage on a local, state or Commonwealth level. As such, there are no pertinent legislative requirements to assess the impact of the proposal against in this report in terms of built heritage.

However, the site comprises two items (Links Battery and remnants of 1000yd Firing Range) which are identified as having some heritage significance given their association with the historic use of the site. Therefore, the planning proposal has been discussed in the section below in relation to any potential heritage impacts on the significance of these items.

The section of the dune system comprised within the subject site is not listed on the Port Stephens Local Environmental Plan 2013 however the subject site is located in the general vicinity of the area defined as the Stockton Beach Dune System (item 34) which is located north of the site.

Figure 7 – Heritage map indicating the approximate boundaries of the subject site (blue).



Source: Ports Stephens LEP 2013 Heritage Map sheet 004A

## 5.2. HERITAGE IMPACT ASSESSMENT

The following observations have been set down in regards to the potential heritage impact of the planning proposal on the values associated with the remnant elements on the site.

### Land Use Rezoning

The entire site is currently zoned E2 – Environmental Conservation. However, the subject site presents an opportunity for redevelopment given it is underutilised and comprises only one built heritage feature. The south and west sections of the site are therefore proposed to be zoned R3 – Medium Density Residential.

The land use rezoning would facilitate future development of the area currently occupied by the remnants of the 1000-yard firing range. It should be noted that this element does not comprise any built elements, it essentially constitutes ten sandy tracks extending from the central road that are becoming overgrown and are increasingly indiscernible from the ground plane. All associated fabric such as the original targets appear to have been removed. Therefore, although there is some historic significance associated with the use of the site as a rifle range, the remnants of the Firing Range does little to contribute to an understanding of this historic use. The element has been identified as having little conservation value (GML 2008) and is only easily appreciable in aerial imagery. It is considered that heritage interpretation in the context of new residential development would be more effective in communicating the sites former use than the retention of the element in its current condition.

Further to the above, in addition to the built heritage values comprised within the site, it is appreciated that there is also a number of highly significant ecological and Indigenous values. All elements of environmental significance comprised within the site have been concurrently considered in the preparation of the planning proposal and master plan. It is understood that as the area occupied by the firing range is previously disturbed it has the least potential for comprising highly significant ecological or archaeological fabric. The subject area is therefore presented by the respective consultants as the most opportune area for sympathetic development on the site. Given the low integrity of the Firing Range and the comparatively high values identified by other consultants across the remainder of the site it is appreciated that the nominated area is the most appropriate area for redevelopment such that the holistic environmental significance of the place retained. The rezoning of the proposed area for medium density residential is therefore supported from a heritage perspective.

The significance of the Links Battery has not been categorically stated in Section 4 of this report as it was not accessible or easily visible during the site inspection and appears to be in poor condition. However, as the last remnant built fabric on the site with an association with the significant historic use, it has the most conservation value. Cognisant of the conservation value of the battery it is proposed to retain the existing land use zoning (E2 – Environmental Conservation) in the area it occupies. This would ensure that the areas of value (heritage and ecological) remain undisturbed.

Residential development to the south and west of the Links Battery which would be facilitated by the proposed residential zoning would be appropriately set back as the E2 zoning extends past the identifiable curtilage of the Links Battery. This would retain a curtilage around the item, ensure legibility of its original setting and encourage appreciation of it.

The residential development facilitated by this planning proposal would not notably alter the character of the setting of the heritage listed section of the Stockton Dune system to the north as there is a substantial separation between the subject site and the latter, and it is anticipated that the development would be largely screened by dense mature vegetation and the dunes along the eastern boundary of the subject site. Further, the residential development would be confined to the western part of the subject site and therefore is unlikely to notably alter the form of the Dune System along the eastern boundary of the subject site which contributes to the setting of the listed item to the north.

### Maximum Height

Under the current LEP, the subject site is not affected by a maximum height of buildings control. However, given the proposed residential zoning it is considered appropriate that the height of future development is managed such that it does not unduly dominate the remnant early fabric on the site.

There is a part 9-metre, part 15-metre maximum height proposed to the west and south of the remnant Links Battery. This zoning would facilitate 2-5 storey development. It is considered that this maximum height is appropriate in the context of the early fabric as it is modest and given the separation from the early fabric maintained by the land use zoning, it would not visually dominate the fabric.

The proposed maximum height zoning will facilitate development which would alter the existing density on the site and the original character of the setting of the early fabric. However, it is acknowledged that without ongoing use the site is likely to remain in a vacant, underutilised state and there will be no opportunity for the public to appreciate the Links Battery. The increase in density on parts of the site, with a buffer established by the appropriate application of a residential zoning and sympathetic design development of dwellings, is the preferred option in comparison to the retention of the site in its existing state.

There are no significant views to the Links Battery at present given the amount of surrounding vegetation. However, as the areas to the east and to the immediate south of the battery would remain unzoned in terms of height, the fabric item, if cleared of vegetation may be appreciable from a wide area including from the main central circulation corridor.

### **Lot Size**

The site is currently affected by a minimum lot size of AB3 which restricts any lot to a minimum of 40 hectares in area.

It is proposed to retain the minimum lot size across the majority of the site such that the existing density in the vicinity of the Links Battery and the listed Stockton Dunes to the north is retained and their settings are respected.

It is proposed to reduce the minimum lot size in the south west corner of the site to 500sqm with a small area of 200sqm. As discussed above, while this would facilitate a change in the character of the setting of the early fabric remnant on the site it is appreciated that a separation would be maintained as a result of the application of the residential zoning and considered that increased density on the site is preferable to its continued disuse.

It is not considered that the increased density on the subject site as facilitated by the planning proposal would have any negative impacts on the heritage listed section of the Stockton dunes as there is a significant distance between the developable part of the subject site and the item. Further, the increased density would not impact on the ability of the dunes along the eastern boundary of the subject site to contribute to the setting of the listed item.

The proposed changes to the minimum lot size are therefore supported from a heritage perspective.

The following observations have been set down in regards to the potential heritage impact of the indicative Master Plan:

- There are no works proposed in the vicinity of the Links Battery. This would ensure that the historic associations of the site are maintained. It is recommended that a schedule of conservation works be completed as part of any master planning process to ensure the integrity of the item and facilitate identification of options for adaptive reuse;
- It is appreciated that the circulation has been designed such that the original axis' of some of the firing markers associated with the 1000yd Firing Range have been interpreted. It is considered that this could be supplemented by interpretation devices to communicate the values associated with the site; and

## 6. CONCLUSION AND RECOMMENDATIONS

The planning proposal presents an opportunity to invigorate a presently underutilised site. The area to be rezoned is resultant of extensive and concurrent site investigations which have identified the significant values associated with the site. These values relate to built heritage, Indigenous archaeology and ecology among others. The investigations into sensitive areas comprising these values have facilitated the identification of the most appropriate area for redevelopment on the site. This area constitutes the western portion of the site, not including the area along the northern boundary. It is within this area that rezoning is proposed.

The land use and maximum height of building rezoning would facilitate future development of the area currently occupied by the remnants of the 1000-yard firing range. There is no built fabric remnant from this element (such as the original target mantlets and stop butts) which now presents as a series of semi cleared tracks at 100yd intervals. The element has been identified as having little conservation value (GML 2008) and is in a constantly deteriorating condition as the tracks become more overgrown. It is considered that heritage interpretation in the context of future residential development in this area would be more effective in communicating the sites former use than the retention of the element in its current condition.

It is appreciated that the planning proposal does not facilitate any future development in the area occupied by the Links Battery in addition to that which is permissible under the existing planning controls. As the Links Battery constitutes the only remnant built fabric with a connection to the sites historic use, it is considered that the planning proposal would be sympathetic to the most significant and intact fabric comprised in the site in terms of built heritage.

It is considered that the application of the new zoning across the site and the proposed maximum building heights would be appropriate in ensuring that the new development does not visually dominate or detract from the remnant fabric of the Links Battery.

In accordance with the above and the observations set out in this report, the Planning Proposal is supported from a heritage perspective.

The indicative Master Plan addressed herein has been developed to illustrate a potential product of the planning proposal. It is considered that the indicative Master Plan conserves the heritage significance of the site which is largely vested in the remnant Links Battery and allows for the interpretation of the original firing range markers. Further development of the indicative Master Plan is supported.

## RECOMMENDATIONS

The following recommendations have been set down to guide the next stages of the process including the design development of a proposed master plan:

- Note that at the time of inspection (May 2016) the Links Battery was severely overgrown and essentially inaccessible. The areas accessed indicate that it is in poor condition. Subsequent development applications and works on the site should ensure future repair and maintenance of the Links Battery. Specifically, the item should be stabilised, repaired where necessary and appropriately conserved. Clearing the vegetation will allow for the identification of opportunities to heritage list the item in the future and/or incorporate the item into an Interpretation Plan for the site; and
- An interpretation strategy should be prepared in conjunction with the master planning for the site. The site of the battery could be considered for the location of interpretative devices which communicate the historic values associated with the site.

## 7. BIBLIOGRAPHY AND REFERENCES

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*[Note: Some government departments have changed their names over time and the above publications state the name at the time of publication.]*



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