Heritage Curtilage Zone of Catherine Park House (aka Oran Park House) Stage 6 Subdivision Catherine Park, NSW

Amendment to Building Height Development Standard under State Environment Planning Policy (Sydney Region Growth Centres): HERITAGE ASSESSMENT & EVALUATION REPORT



prepared for Hixon Pty Ltd

23rd February 2021 REF: 1708C: HA&ER Issue 04 FINAL



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Report Register

The following table is a report register tracking the issues of *Heritage Curtilage Zone of Catherine Park House (aka Oran Park House): Stage 6 Subdivision, Catherine Park, NSW, Amendment to Building Height Development Standard under State Environment Planning Policy (Sydney Region Growth Centres): HERITAGE ASSESSMENT & EVALUATION REPORT* prepared by Tropman & Tropman Architects.

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Project Ref No.	lssue No.	Description	Prepared by	Approved by	Issue to	Issue Date
1708C: HA & ER	01	DRAFT Heritage Curtilage Zone of Catherine Park House (aka Oran Park House): Stage 6 Subdivision, Catherine Park, NSW, Amendment to Building Height Development Standard under State Environment Planning Policy (Sydney Region Growth Centres): HERITAGE ASSESSMENT & EVALUATION REPORT	Scott Murray	John Tropman	Trevor Jensen	05.02.21
1708C: HA & ER	02	DRAFT Heritage Curtilage Zone of Catherine Park House (aka Oran Park House): Stage 6 Subdivision, Catherine Park, NSW, Amendment to Building Height Development Standard under State Environment Planning Policy (Sydney Region Growth Centres): HERITAGE ASSESSMENT & EVALUATION REPORT	Scott Murray	John Tropman	Trevor Jensen & Guy Evans	12.02.21
1708C: HA & ER	03	Final Heritage Curtilage Zone of Catherine Park House (aka Oran Park House): Stage 6 Subdivision, Catherine Park, NSW, Amendment to Building Height Development Standard under State Environment Planning Policy (Sydney Region Growth Centres): HERITAGE ASSESSMENT & EVALUATION REPORT	Scott Murray	John Tropman	Trevor Jensen & Guy Evans	22.02.21
1708C: HA & ER	04	Final Heritage Curtilage Zone of Catherine Park House (aka Oran Park House): Stage 6 Subdivision, Catherine Park, NSW, Amendment to Building Height Development Standard under State Environment Planning Policy (Sydney Region Growth Centres): HERITAGE ASSESSMENT & EVALUATION REPORT	Scott Murray	John Tropman	Trevor Jensen & Guy Evans	23.02.21

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INTRODUCTION 1.0

1.1 Brief

Hixson Pty Ltd have requested a heritage assessment and evaluation to support a Planning Proposal to amend the building height development standard for land within and surrounding the Heritage Curtilage Zone of Catherine Park House (AKA Oran Park House) of the Stage 6 Subdivision, Catherine Park, NSW.

In particular, we are to review the numeric height limit that was imposed under the State Environmental Planning Policy associated with the requirement for single storey dwellings to be constructed within and adjacent to the SHR Curtilage of Catherine Park House, (aka Oran Park House - SHR 1695). The relevant Height of Buildings map is included in the State Environmental Planning Policy (Sydney Region Growth Centres) 2006 - (South West Growth Centre Height of Buildings Maps - Sheet HOB_004 and Sheet HOB_009).

The five (5.0) metre maximum building height development standard imposed on land located within and adjacent to state heritage item SHR - adopted in State Environmental Planning Policy (Sydney Region Growth Centres) 2006 - does not fully support the intended design outcomes of enhancing the heritage significance of Catherine Park House. In particular, the five metre limit does not provide sufficient building height for the 'desirable roof forms'; 'flexibility of interior space'; or 'lofts, attics and dormer windows' for the intended 'stately' dwellings located on larger sized lots. The intended design outcomes are identified in Schedule 4 - Catherine Field (Part) Precinct, Sept 2020, NSW Government.

The Planning Proposal proposes to change the maximum building height from five (5.0) metres to eight (8.0) metres to appropriately support the desired built form design outcomes.

1.2 Study Area

For the purposes of this report the place, as defined in the Burra Charter is to be known as the subject site or study area.

The site is located within the Stage 6 Subdivision of the Catherine Park Estate. Catherine Park is the first residential development within the Catherine Fields Part Precinct, which was rezoned for urban development in December 2013.

The land subject to the Planning Proposal is land owned by Hixson Pty Ltd and is identified as Lot 204 in DP1235003 (4 O'Keefe Drive, Oran Park) and Lot 7300 DP1234998 (141 Banfield Drive, Oran Park).

Catherine Park contains a State listed heritage item, an early European settlement homestead, named Catherine Park House (aka Oran Park House) SHR 1695 – refer to Figures 1 - 3. The Precinct Planning for the Catherine Fields Part Precinct implemented special development standards around Catherine Park House to deliver a transition in development between the heritage item and surrounding urban development.



Figure 1: Site Plan (Source: Concept DA | Stage 6 Catherine Park, Urbanco 2021, p.6)

A Concept Development Application (DA) was lodged with Camden Council in January 2021 seeking approval for an eight (8) metre height limit for 66 residential allotments that are subject to five (5) metre height limit under the Growth Centres SEPP. The Concept DA included a SEPP Clause 4.6 Variation request and the subject lots are shown in Figure 1. The Concept DA is an interim solution to addressing the building height for the 66 lots.

The area in the Planning Proposal subject to the proposed change to the building height standard incorporates all land affected by the five (5) metre height limit surrounding Catherine Park House. A portion of this area subject to the five (5) metre height limit is within the Heritage Curtilage Zone.

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Figure 2: Subject Site – SHR 1695, Plan 1927 (Source: *NSW Heritage Office*).



Figure 3: Subject Site - SHR 1695 Curtilage (Source: Concept DA | Stage 6 Catherine Park, Urbanco 2021, p.9)

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1.3 Methodology

The methodology undertaken is this report is consistent with Australia ICOMOS *Charter for the Conservation of Cultural Significance (The Burra Charter)* and *Guidelines to the Burra Charter: Cultural Significance, Conservation Policy, and Undertaking Studies and Reports* as well as Heritage Office Assessing Heritage Significance.

1.4 Limitations

Existing historical information was utilised and no further historical research was undertaken through the course of this project. This report was undertaken within limited time constraints.

1.5 Author Identification

This report has been prepared by:

John Tropman	Director, Architect, Heritage Conservation Architect,
Scott Murray	Senior Project Architect

Note: Unless otherwise stated, all images are by the authors and were taken during the course of this study.

1.6 Previous reports, available information and background material

This report has been prepared with the use of the following references:

- Clause 4.6 Variation Request: Concept Development Application Residential Dwelling Development Standards & Three (3) New Residential Dwellings: Stage 6 | Catherine Park, Final, 25 January 2021, Urbanco;
- Statement of Environmental Effects: S4.22 Concept Development Application Residential Dwelling Development Standards & Three (3) New Residential Dwellings: Stage 6 | Catherine Park, Final, 25 January 2021, Urbanco;
- State Environmental Planning Policy (Sydney Region Growth Centres) 2006;
- Camden Growth Centre Precincts DCP: Schedule 4 Catherine Field (Part) Precinct;
- Catherine Park Estate: Oran Park House Heritage Exemption Guidelines, Oct 2014, Design + Planning;
- Oran Park (SHR 1695), Also known as Catherine Park, Oran Park Drive, NSW, Conservation Management Plan, Issue 23, May 2019, Tropman & Tropman Architects;
- Catherine Park Oran Park Drive, NSW Heritage Curtilage and Development Guidelines for development surrounding Oran Park House, December 2013, Tropman & Tropman Architects;
- *Catherine Park Heritage Analysis & Review Report,* December 2012, Tropman & Tropman Architects;

1.7 Abbreviations

aka	also known as

- CMP Conservation Management Plan
- DA Development Application
- DCP Development Control Plan
- JMD Registered Surveyor JMD Development Consultants
- LEP Local Environment Plan
- SEE Statement of Environmental Effects
- SEPP State Environmental Planning Policy
- SHR State Heritage Register
- TTA Tropman & Tropman Architects

2.0 HISTORICAL DOCUMENTARY EVIDENCE

3.1 Historical notes & images:

A full history of Oran Park (aka Catherine Park) is contained within the Oran Park (SHR 1695). Also known as Catherine Park, Oran Park Drive, NSW, Conservation Management Plan, May 2019, Tropman & Tropman Architects. The following historical notes and images (Figures 4 - 7) are an extract from the NSW Office of Environment & Heritage website.

The area is home to the Tharawal and Gundungurra people (Robinson, 2008).

Camden & the Cow Pastures:

The area is associated with the early history of the colony of New South Wales. Governor Hunter named it The Cowpastures after cattle which had strayed from the Farm Cove settlement were discovered there in 1795. Due to the early European settlers, namely the Macarthurs, who established flourishing wool, wine and wheat industries here, the area is said to be 'the birthplace of the nation's wealth' (ibid, 2008).

After settling at Sydney Cove in 1788, the First Fleet soon found the soil unsuitable for farming and looked for more fertile soils beyond the established boundaries of the colony. By 1795, the settlers had journeyed to the Cumberland Plain (to the west) and discovered the rich land of the Cowpastures, named after the discovery of a herd of wild cows that had escaped the colony years earlier and wandered west, grazing the land now known as the Camden district.

Following the discovery of the area, the colonial gentry soon regarded it as rich. fertile and suitable land for livestock grazing and pastoral pursuits. The low rambling hills and wide expanses of grass flats were devoid of difficult vegetation and reminded the colonists of the familiar landscape of an English gentleman's park. This environment was considered ideal for the establishment of the wealthy estates so desired by the colonial gentry.

Quickly, the acquisition of land in the district was being sought by private colonists. The newly appointed governor, Lachlan Macquarie, soon had the land surveyed and began granting land allotments to the colonial elite.

In 1815, Governor Macquarie granted a 2000 acre parcel of land to Captain William Douglas Campbell, a member of the British merchant navy, who named the estate Harrington Park. The land on which Oran Park house now resides was, during Campbell's time, open cleared land for pastoral cultivation and livestock grazing.

Upon Campbell's death in 1827, Harrington Park underwent the first of many land subdivisions. One thousand acres was transferred to Campbell's nephew, John Douglas Campbell, who commenced construction of a dwelling house and associated outbuildings (the existing coach house dates from c1837). Although the buildings were incomplete. Campbell leased the property in 1839 to Henry Keck Esq., Governor of Darlinghurst Gaol, who (as an agreement of the lease) was to continue with and finalise the construction of Oran Park house.

In 1842, the lease was transferred to Henry William Johnson who took out two mortgages on the property. It is assumed that the first was to purchase 800 acres of land and the buildings and the second was to finalise the construction of Oran Park house (c1865). Johnson lived at Oran Park until 1867 when he defaulted on his mortgages and was foreclosed on by Thomas Barker who took possession of the property. It is alleged that, following this, the shamed Johnson leapt to his death from the roof of Oran Park house.

In the early 1840s, Camden farmers turned their attention to wheat growing.

Many sowed large areas to cash in on the high prices paid for the local flour which had a good reputation in the Sydney market. Unfortunately rust appeared in the crops in 1861 and 1863 and the industry was ruined along with many farmers (ibid, 2008).

By 1871, when Oran Park was sold to Edward Lomas Moore, the house was in poor condition. A wealthy grazier and one of the largest landowners in the Campbelltown district, Moore lived at Oran Park with his wife Anne and large family (of some 12 or so children) until the construction of the nearby Badgally house was complete. When the family moved in 1882, Moore leased the imposing two-storey Oran Park house (with wrap-around verandahs, rear basement, octagonal tower and established gardens) to Thomas Cadell who operated the property as a dairy farm.

In the 1880s dairy farming became the main industry in the area. GA Porter was the first farmer to send milk to Sydney, from his property Corstorphine, on 6 March 1883. Farms have started to disappear however, due to the pressures of high production costs, milk quotas and competition with dairy companies, and also attractive offers from land developers (ibid, 2008).

Upon Moore's death in 1887, and after years of the contention of his will, the ownership of the Oran Park property finally passed to his younger son Essington Moore in 1907 who initially leased the property before returning from England in the 1930s to make Oran Park his permanent home. Oran Park house underwent some changes during the Moore period (the roof was reconfigured and the lantern removed) but, upon his sudden death in 1937, the property was sold to Hubert Harry Robbins who had grand intentions to develop Oran Park as his family's country retreat. Much of the significant modifications to Oran Park house are attributed to Robbins who converted the Victorian Italianate house into a Georgian Revival style.

After Robbins death in 1945, Oran Park was sold to Daniel James Cleary (who established the Oran Park Raceway, west of the property), sold again to Sydney merchants Arthur Raymond Booth and Robert Leslie Booth later in 1946 and then again to Camden farmer John Thomas Vivian Frost in 1947. Frost continued the farming use of the property until 1960 when it was then sold to Cobbitty Investments Pty Ltd for subdivision into hobby farms. Sold again in 1961, Oran Park became the property of Edward Star, a hotel proprietor from Sydney's eastern suburbs, who developed the property and established a trotting track, 18hole golf course and function centre. During this time, Oran Park house was used as the golf clubhouse.

After another failed development attempt and a succession of different owners, Oran Park was purchased in 1969 by the Honourable Lionel John Charles Seymour Dawson-Damer. An engineer and motor racing enthusiast in Australia and internationally, Dawson-Damer was attracted to the property because of its close proximity to the Oran Park Raceway and was said to house his historic car collection in the stables and outbuildings of the Oran Park property.

In a dilapidated state upon the purchase, Dawson-Damer and his wife Ashley set about restoring the house and outbuildings (including coach house), reestablishing the gardens and reinstating the former historic driveway to Cobbitty Road (now Oran Park Drive).

The Hon. Lionel John Dawson-Damer was killed in a racing accident in 2002 and the ownership of Oran Park has since exchanged hands a number of times. Currently owned by Hixson Pty Ltd (as of August 2013), Oran Park is the subject

of the Catherine Fields (Part) Precinct land release area and progressive suburban development.

Source: https://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=5052417





Figure 6: Oran Park House c1938. Source: Moore Family Archives as located in the GML CMP & TTA CMP, 2019, p. 112.



Figure 7: View of front entry to Oran Park House and garden (south elevation), 2013. Source: TTA CMP, 2019 p. 62.

3.2 Statement of Heritage Significance: Oran Park (SHR 1695)

Statement of Significance (prepared by Tropman & Tropman Architects and Casey & Lowe in CMP, 2019, p.146.

Oran Park Estate is of State significance as an exceptional example of a Nineteenth Century homestead complex sited to be a landmark in the Cowpastures landscape. Oran Park House is a fine example of a Victorian Period villa building that has been very competently and successfully adapted externally to appear as a Georgian Revival style Interwar Period residence by the Robbins family in c1940. It has historical significance as part of the original 1815 Campbell grant of Harrington Park. The property has associations with the prominent Campbell, Moore, Robbins, and Dawson-Damer families. Despite never being fully intensively farmed, the property has significance as one of a group of midnineteenth century pastoral properties in the Camden Local Government Area that was mostly used as a Gentleman's Estate or Country Retreat. The House's prominence allows views to and from the property from various distant vantage

points including Oran Park township and the Camden Valley Way. The Coach House is also of state significance, despite modifications, being the early residence on the estate. There appear to be no plantings pre-dating the 1940s at the site, located within the confines of the House gardens. Some native vegetation remains along the riparian corridor of South Creek.

The site of Oran Park House has the potential to contain archaeological evidence relating to its use as a homestead in the 19th and early 20th centuries. These remains are likely to consist of structural remains and subfloor occupation deposits associated with the 19th and early 20th century outbuildings, rubbish pits and backfilled wells, cisterns and/or cesspits, remains of early driveways, and subfloor occupation deposits within the standing house, and in the modified coach house to the southeast. Evidence of early land clearances and cultivation, and structural remains such as sheds are less likely to have survived in the areas outside the immediate vicinity of the house.

The Coach House is probably the earliest European structure on the site, and is most likely a modified version of the original 1830s dwelling house on the property. The later house, now known as Oran Park House, dates to c.1865. Both structures have the ability to illustrate the evolution of a Sydney fringe pastoral estate from small scale dairying, grazing and cropping to stately home and recreational facility. The silage silo c1920 of moderate significance is evidence of dairying as a past use. The relocated Caretaker's Cottage of c1930 has been heavily adapted with an addition to the front in 1976 and further modifications in 1990. Therefore it is of little significance. Archaeological remains also have the ability to provide insight into standards of living, material culture, consumerism, gender relations, and other areas of interest not available from the historic record.

Identified Aboriginal archaeological sites in the study area were of moderate and/or low significance. Sites of moderate significance have the potential to contribute to the holistic understanding of the Aboriginal cultural landscape of Oran Park such as interrelationships between sites, Aboriginal cultural use of the landscape and occupational patterns. Sites of low significance are highly disturbed and are unlikely to provide any such insight.

Substantive European archaeological remains related to the initial use of the property, particularly the coach house if it is the original 1830s residence, and other nineteenth-century remains associated with the homestead or reflecting the use of the property in this period would be of State heritage significance. Later 19th and early 20th-century archaeological remains would be considered to be of local heritage significance.

3.0 PROPOSED SEPP CLAUSE 4.6 VARIATION

The Planning Proposal seeks to change the area surrounding Catherine Park House currently subject to a maximum building height of 5 metres to a maximum building height of 8 metres.

3.1 Planning Context

The subjects site is controlled by the following planning controls:

- Camden Council Local Environment Plan
- State Environmental Planning Policy (Sydney Region Growth Centres) 2006:

Appendix 9 Camden Growth Centre Precinct Plan

Height of Buildings Map;

5.10 Heritage conservation;

Schedule 5 Environmental heritage;

Schedule 5	Environmental I	heritage			(Clause 5 10
Precinct	item name	Address	Property description	Significance	0.2007.00000000
Catherine Fields	Oran Park, including homestead, gardens, outbuildings, old cottage, silo, stable building, carriage house, drive and circular carriage drive	931 Cothiny Road	Part Lot 27, DP 213330 and Part Lot 7, DP 1173813	State	18

- Camden Growth Centre Precinct Plan DCP: Schedule 4 Catherine Field (Part) Precinct
- Heritage Exemption Guidelines attached to the SHR listing (SCHEDULE "C" All works and activities in accordance with 'Catherine Park Estate: Oran Park House Curtilage Exemption Guidelines', prepared by Design & Planning for Hixson Pty Ltd, dated October 2014.)

As indicated in *SEE Concept Development Application*, Jan. 2021, prepared by Urbanco, a key objective of the adopted planning provisions from the initial Precinct Planning was to keep the new residential dwellings surrounding Catherine Park House subservient to the heritage item. These dwellings are to be single story houses on large allotments with greater separation between the dwellings than would typically occur.

The Camden Growth Centres DCP includes site specific controls for the built form by limiting residential dwellings to single storey construction only. In addition, a statutory development standard for a 5 metre building height limit and minimum lots sizes for 700m² and 500m² lots was also imposed in the Growth Centres SEPP.

A prime design objective for the residential dwellings in close proximity of Catherine Park House was to have a minimum and maximum roof pitch of 22.5° and 35° respectively. This would ensure that dwellings surrounding the heritage item would be appropriately designed and not have low pitched roof forms, which was considered detrimental to the heritage significance of Catherine Park House.

Heritage Exemption Guidelines under the *Heritage Act 1977* have also been adopted under the State Heritage Listing. The Guidelines provide a pre-assessment framework for the residential dwellings within the heritage curtilage. If the dwellings designs are consistent with the Heritage Exemption Guidelines, then Integrated Development referrals and approvals under Section 60 of the *Heritage Act 1977* are not required. Two of the essential criteria in the Heritage Exemption Guidelines include:

- Residential dwellings can only be single story, and
- Roof pitch is to be between 22.5° and 35°

There is no maximum building height limit specified in the Heritage Exemption Guidelines.

3.2 Proposed Amendment to Height of Buildings Map

The Planning Proposal seeks to amend the Height of Buildings Map from five (5.0) metre to eight (8.0) metres maximum building height limit (refer to Figures 8 & 9).



Figure 8: Current Maximum Building Height Map (Source: January 2021, DA documents prepared by Urbanco)

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Figure 9: Proposed Height of Buildings Map indicating an eight (8.0) metre maximum building height (Source: Urbanco, 2021)

4.0 EVALUATION OF PLANNING PROPOSAL

4.1 Introduction

The evaluation will discuss separately the heritage impact upon of the current Building Height Limit of five (5.0) metres and the proposed Building Height Limit of eight (8.0) metres against the <u>Camden Growth Centre Precinct DCP: Schedule 4</u>. Careful consideration of the following relevant clauses is provided:

- 4.1.2 Oran Park House outer heritage curtilage principles;
- 4.1.15 Building Height;
- <u>4.1.16 Roofs;</u>
- 4.1.17 Lofts, attics and dormer windows;
- 4.1.13 Corner sites.

A brief evaluation of the Oran Park (SHR 1695), aka Catherine Park, Oran Park Drive, NSW, Conservation Management Plan is provided in APPENDIX A.

4.2 Evaluation of Current Building Height Limit of Five (5.0) metres

Generally, the Oran Park House outer heritage curtilage principles in the DCP were established to ensure that developments in the vicinity of heritage items were designed and sited to protect the significance of that item. The zone surrounding the Heritage Homestead Lot allows for very low residential density, with a maximum height of one storey. As discussed, the current maximum height in the LEP is five (5.0) metres. The relevant clauses are considered as follows:

4.2.1 <u>4.1.2 Oran Park House outer heritage curtilage principles</u>

The objectives of this clause are to preserve the heritage significance of Catherine Park House (AKA Oran Park House) estate, by ensuring developments are designed and sited to minimise their impact. Of particular relevance is the 'Very Low Density Residential' and the protection of the views and vistas. There are four main view corridors to consider and these are indicated in Figure 9 (Figure 4-2 of the DCP) below.



Figure 9. Source: Camden Growth Centre Precinct DCP Schedule 4, p.29,

4.2.2 <u>4.1.15 Building Height</u>

The intention of this control is to provide a transition zone and to reduce the impact of dwellings immediately adjacent to the Heritage Homestead Lot. These dwellings are to be subservient to the heritage item, while maintaining the significant vistas through the curtilage. The relevant extracts are indicated below.

	tives
a)	To ensure development provides an appropriate relationship between heritage items and new subdivisions.
b)	To reinforce the existing heritage character by maintaining significant vistas throughout the heritage curtilage.
c)	To ensure that buildings provide sufficient amenity by allowing solar access to private and public spaces.
ontr	rols
1.	Residential development in the Oran Park House heritage curtilage must comply with the Height of Buildings maps in State Environmental Planning Policy (Sydney Region Growth Centres) 2006.

Source: Growth Centres DCP: Schedule 4 Catherine Field (Part) Precinct, September 2020, pp.40-41.

The Building Height objectives and controls in this document do not provide a numerical value for the maximum permissible building height. The maximum value is currently noted as 1 storey. Refer to clause <u>4.1.24 Development Assessment Table for the very low</u> <u>density area surrounding Oran Park House</u>, p.44. As identified earlier, the numerical value of five metres was imposed via the Height of Buildings maps in the SEPP – refer to Figure 10. It has become apparent that testing of the built form against the five metre height limit was not undertaken.

Understanding the design constraints of the current five metre maximum building height are best understood by reviewing typical building cross sections – refer to Figure 11. As indicated earlier, a simple hipped roof form with a roof pitch of between 22.5 degrees and 35 degrees was considered a critical requirement for a sympathetic roof form and hence maintaining the heritage significance of Catherine Park House.

Design constraints of the five (5.0) metre height restriction are identified as follows:

- a) If the recommended minimum roof pitch of 22.5^o degree is adopted, the roof form will exceed the five (5.0) metre building height. A lower roof pitch will fit under the 5.0m building height, however this is less than the minimum allowable roof pitch of 22.5^o. Similarly, the maximum 35^o roof pitch is unworkable. Refer to Figure 11.
- b) The five (5) metre maximum building height is limiting design options to achieve the desirable variable roof forms that are proportionate and aesthetically acceptable. Further, a roof space height of less than 2.0m will only be achievable.



Figure 11: The recommended minimum roof pitch of 22.5^o and maximum roof pitch of 35^o are unworkable as they both breach the five (5) metre roof height

- c) The five (5.0) metre building height will become both the minimum and maximum with similar roof forms. There will be no potential for a variety of roof forms along the streetscape, as indicated in clause <u>4.1.16 Roofs</u>.
- d) The internal floor-to-ceiling height will generally be limited to 2.4m. There is limited potential to vary wall heights, both internally and externally.
- e) The option to include habitable rooms within the roof space does not exist.
- f) The five (5.0) metre height restriction limits floor design, even with the construction of a concrete slab-on-ground. A floor level set immediately at the existing ground line with no step up is problematic for sloping ground, stormwater runoff and garden design. There is no potential to vary the floor height above the ground line.

4.2.3 <u>4.1.16 Roofs</u>

The primary intention of this control is to reduce the repetition of similar roof forms while ensuring the streetscape enhances the significance of the heritage items. Simple hipped roof forms with a roof pitch of between 22.5 degrees and 35 degrees are considered a critical requirement to maintaining the heritage significance of Catherine Park House and its associated items.

bjec	tives
a)	To ensure that the design of roofs do not detract from the heritage significant of items in the curtilage.
b)	To reduce repetition of similar roof forms on dwellings surrounding Oran Park House.
c)	To promote the use of materials and colours that create attractive and complementary streetscapes within the Oran Park House heritage curtilage.
ontr	ols
1.	Roof pitches are to be between 22.5 degrees and up to 35 degrees.
2.	Roofs are to be of simple design and form with either simple hips or gables. Federation detailing, symbolism and Victorian inspired gables are not permitted.
З.	The minimum eave overhang is 450mm.
4.	Roofs must use neutral colour tones such as greys, greens or browns.

Further, varying roof pitches enables a variety of the roof aesthetics, proportions and building forms. As discussed in <u>4.1.15 Building Height</u> above and illustrated in Figures 11, a variation in roof pitch is barely discernible with roof proportions controlled by the current five metre maximum building height control. The lack of variable wall height is also limiting the variety of the streetscape.

The roof forms will be over simplified. There are no opportunities to include effective dormer windows as promoted in clause <u>4.1.17 Lofts, attics and dormer windows</u> and <u>4.1.13 Corner sites.</u>

4.2.4 <u>4.1.17 Lofts, attics and dormer windows</u>

This control was intended to promote a varied streetscape complementary to the heritage item, while allowing for the flexibility of habitable spaces to be located within the roof attic space. The resultant roof form would be varied by the inclusion of dormer windows.

The five (5.0) metre maximum building height prevents the inclusion of habitable loft and attic spaces due to the non-complying BCA ceiling heights for habitable rooms within roof spaces. This clause nullifies the opportunities identified in clause <u>4.1.13 Corner sites.</u>

4.1.17 Lofts, attics and dormer windows

Objectives

- a) To promote variety and interest in the streetscape within the Oran Park heritage curtilage.
- b) To provide flexibility in the design and location of floor space within a home.

Controls

- Variations to the building height on corner lots may be appropriate when attic rooms with dormer windows are proposed, and where there will be no impact on the views and vistas to and from Oran Park House and grounds.
- Occasional lofts can go over roof pitch as long as design proportions are in harmony with the overall skyline of development.

Source: Growth Centres DCP: *Schedule 4 Catherine Field (Part) Precinct,* September 2020, pp.40-41

4.2.5 <u>4.1.13 Corner sites</u>

The objectives included for corner sites are similar to and dependent upon those identified in *4.1.15 Building Height; 4.1.16 Roofs;* and *4.1.17 Lofts, attics and dormer windows.*



2020, pp.40-41 In summary, the analysis demonstrates that the heritage design requirements for corner blocks with regard to roof pitch, simple hipped roof forms, and dormer windows cannot be achieved with a five (5.0) metre maximum building height. The analysis also indicates that site drainage, landscape, ground floor and internal spatial design options will be compromised. It is essential that achieving the roof pitch ($22.5^{\circ} - 35^{\circ}$) requirements in

the DCP and Heritage Exemption Guidelines is necessary for an appropriate, sympathetic streetscape design that enhances the heritage precinct and curtilage.

4.3 Evaluation of Proposed Building Height Limit of Eight (8.0) metres

The proposed maximum building height for the LEP is eight (8.0) metres. Evaluation of this proposal will firstly consider the potential impact at the broader scale, specifically the significant views and vistas identified in the DCP clause <u>4.1.2 Oran Park House outer</u> <u>heritage curtilage principles</u>. Secondly, the evaluation will consider the closer scale of streetscape and individual dwellings, specifically the potential impact upon <u>4.1.15 Building</u> Height; 4.1.16 Roofs; 4.1.17 Lofts, attics and dormer windows; and 4.1.13 Corner sites.

4.3.1 <u>4.1.2 Oran Park House outer heritage curtilage principles</u>.

An eight (8.0m) metre maximum building height will increase the portion of the roof that will be above the current five (5.0) metre maximum building height line. This is an increase to the pitched roofscape of three (3.0) metres. The overall impact is likely to be varied and dependent on the viewing location, its topography and dwelling roof design on each lot. Some variables may occur due to differing designs such as building footprints, roof forms, roof pitches and landscaping.

Generally, the Oran Park House outer heritage curtilage principles in the DCP will continue to ensure that developments in the vicinity of heritage items are designed and sited to protect the significance of that item. An increase in the possible roof height to eight (8.0) metres may have some impact upon the designated significant views and vistas. A detailed analysis and drawings by JMD concludes that the adverse impact on views and vistas from Catherine Park House are minimal, as discussed in the *Clause 4.6 Variation* by Urbanco. Refer to Figures 12 & 13.

Catherine Park House is located on an elevated knoll and sits proud of all new residential development surrounding the heritage item. An analysis of four (4) views from Catherine Park House and the surrounds that intersect the site in variation locations. The analysis shows Catherine Park House and illustrates the section detail aligning with each of the four view lines. The section detail annotates the 5 metre and 8 metre building height limits within the site (66 lots) and also shows the adjoining 9 metre building height around the outer edge of the site.

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Figure 12: Plan showing long section aligned with view corridors from Catherine Park House (Source: JMD 22-01-2021 - 10200(6)DA-VIEW – Sheets 1 & 2)



Figure 13: Long sections aligned with view corridors from Catherine Park House Source: JMD 22-01-2021 - 10200(6)DA-VIEW – Sheets 2 & 2

The clauses concerning streetscape and individual dwellings are considered as follows:

4.3.2 <u>4.1.5 Building Height</u>

The impact of the proposed maximum building height of eight (8.0) metres over and above the current five (5.0) metre limit, can be illustrated by superimposing the potential building / roof form. The shaded area in Figures 14 & 15 indicates two examples of additional form.



Figure 14: The shaded roof form indicates the potential increase of building form of the eight (8.0) metre maximum building height over and above the current five (5.0) metre building height @ **22.5⁰ roof pitch**



pitch

The building height will be influenced by the topography and location of viewing points within the SHR Boundary.

An eight (8.0) metre maximum building height provides the following opportunities:

- a) The opportunity to design a building with a roof pitch ranging from 22.5^o to 35^o, as per the current DCP Roof controls.
- b) An increase in variable roof forms, with improved aesthetically acceptable proportions and quality of potential dwelling designs.
- c) A potential for a mixed variety of external wall heights.
- A potential for a mixed variety of internal floor-to-ceiling heights. For example, a
 3.0m ceiling improves spatial quality, particularly for primary spaces such as living rooms.
- e) There is potential for varied locations of spaces internally, such as the attic spaces.
 Refer to Figures 16 and 17.
- f) There is potential to set the floor level off the ground, allowing for greater flexibility for topography (slope across properties), drainage and landscape treatments.
 Refer to Figures 16 and 17.



Figure 16: Eight (8.0) metre maximum building height & **22.5⁰ roof pitch** – enables an increased ceiling height, a 2.4m floor-ceiling loft and an elevated floor level.



Figure 17: Eight (8.0) metre maximum building height & **35⁰ roof pitch** – enables an increased ceiling height, a 2.4m floor-ceiling loft and an elevated floor level.

4.3.3 <u>4.1.16 Roofs</u>

An eight (8.0) metre maximum building height provides opportunities for improved building and roof forms to the streetscape. The potential positive impacts are set out below;

- a) Allowing the adoption of the minimum and maximum roof pitches identified as an essential design requirement.
- b) A greater discernible variety of roof pitches, building proportion and form will be possible.
- c) The higher roof forms will potentially enrich the design quality of buildings adjacent to Catherine Park House, thereby enhancing the heritage significance. Refer to Figures 14 and 15.

4.2.3 4.1.17 Lofts, attics and dormer windows

An eight (8.0) metre maximum building height provides opportunities for the inclusion of lofts, attics and dormer windows. The potential positive impacts are set out below;

- a) Vary ground floor planning to include loft and attic spaces (2.4m ceilings) within in the roof form.
- b) An improved variety of streetscape, particularly at corner lots.

4.2.3 <u>4.1.13 Corner sites</u>

An eight (8.0) metre maximum building height provides opportunities for the inclusion of lofts, attics and dormer windows at corner sites; The potential positive impacts are set out below;

- a) Improved facade articulation that can contribute to the design quality of housing within the Oran Park heritage curtilage;
- b) Increasing the diversity and interest of the streetscape surrounding the Homestead Lot.

4.4 Evaluation of Building Height Limit of eight (8.0) metres against the CMP

Generally, the Planning Proposal to increase the maximum building height to eight (8.0) metres, will potentially have a positive impact upon the character of the precinct, streetscape and heritage significance of Catherine Park House and immediate surrounds. The dominance of the Catherine Park House on the knoll surrounded by landscaped gardens, recreational areas, service buildings and open paddocks will be maintained. The original setting, which relates to the topography, open space towards South Creek and distant views and vistas from various vantage points and approaches to and from the subject site will generally be acceptable, as intended.

The policies regarding New Work, Future Development and Use (Policies 9.1 - 9.10) are largely unaffected by the Planning Proposal. An essential design guideline regarding roof form and pitch will now be achievable as a result of the increase in maximum building height to eight (8.0) metres.

A brief evaluation assessment of the Conservation Policies included in the Oran Park (SHR 1695), Also known as Catherine Park, Oran Park Drive, NSW, Conservation Management Plan is included in APPENDIX A.

5.0 **RECOMMENDATIONS**

We believe that the proposed change in maximum building height from five (5.0) metres to eight (8.0) metres is acceptable and will enhance the heritage significance of the Catherine Park House item (aka Oran Park House).

From the analysis, it is evident that the required minimum 22.50^o roof pitch and the maximum 35^o roof pitch will be achievable for the simple hipped roof forms that are considered critical for the dwellings in the context of the adjacent heritage items.

The increased building height will enable floors to be slightly elevated off the ground to enable sufficient ground drainage and increased landscape design options. A timber floor and structure also becomes a design option.

In addition, the eight (8.0) metre building height will enable ceiling heights of greater than the minimum allowable height of 2.4 metres.

6.0 CONCLUSION

Generally, the proposed Building Height Limit of eight (8.0) metres will have limited adverse impacts upon the Heritage Exemption Design Guidelines of the <u>Camden Growth Centre</u> <u>Precinct DCP Schedule 4</u> and heritages of the Catherine Park House estate.

There will be minimal adverse impact upon the heritage significant views and vistas associated with the heritage items. The eight (8.0) metre maximum height limit will have a positive impact on the intended development outcomes for the subdivision by encouraging designs of an appropriate contempoary aesthetic, bulk and scale. The heritage significance of Catherine Park House (aka Oran Park House) estate will continue to be respected and enhanced with good quality streetscape design. The single storey dwellings on larger allotments will be designed as intended, with improved variety and design quality, upholding the Heritage Exemption Guidelines and key heritage principles of development surrounding Catherine Park House. Further, the enhanced streetscapes and character of dwellings around the heritage lot will contribute positively to the open space areas.

In conclusion, the proposed Building Height Limit of eight 8.0m will generally have minimal adverse impact upon the relevant conservation policies included in the Oran Park (SHR 1695), Also known as Catherine Park, Oran Park Drive, NSW, Conservation Management Plan.

7.0 APPENDIX

7.1 APPENDIX A: CMP EVALUATION ASSESSMENT

The following table is an evaluation of the proposed Building Height Limit of Eight (8.0) metres with regard to the impact upon the Conservation Polices included in *Oran Park (SHR 1695),Also known as Catherine Park, Oran Park Drive, NSW, Conservation Management Plan*, Issue 23, May 2019, p.161, by Tropman & Tropman Architects. A brief assessment against each policy is indicated below.

KEY: C = Complying; CC = Capable of Complying; NC = Non Complying

Conservation Policy		
Policy 1.1	Generally, treat the site as being of cultural heritage significance, and consequently guide works and activities at the site by the provisions of the Australia ICOMOS Burra Charter.	cc
Policy 1.2	The policies outlined in this document should be adopted as the guide to future planning and work at the site.	СС
Policy 1.3	Works must meet the NSW Heritage Office <i>minimum standards of maintenance and</i> <i>repair</i> , and personnel skilled in disciplines of conservation practice, including professionals, skilled building and engineering trades, etc should be engaged as appropriate to advise or implement conservation works at the site. Personnel involved in the documentation and implementation of works at the site should be recorded for future reference.	сс
Policy 1.4	Carry out, catalogue and archive systematic surveys of the site, before, during and after any works in accordance with NSW Heritage Branch and DUAP Guidelines. Any new information that comes to light during and after works at the site shall be recorded in a report, a copy of which shall be held at the archive of the site.	сс
Policy 1.5	Assemble, catalogue and make readily available for public inspection, copies of all known historical drawings, pictorial documents and written records relating to the site in a permanent archive of the site.	сс
Policy 1.6	Document any proposed works to the place in a way that allows scrutiny by others before they are executed and can be retained for posterity. The documentary or physical evidence upon which conservation decisions are made for each part of the element should be cited. A copy of the documentation, including schedules and drawings, shall be held at the archive of the site.	сс
Policy 1.7	Prepare a Photographic Archival Record of the site prior to, during and after undertaking any major works, following applicable guidelines and standards.	сс
Policy 1.8	This Conservation Management Plan should be reviewed no later than every 10 years, or with any major changes or proposed works to the site.	сс

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7.2 Con	servation of Heritage Significance	
Policy 2.1	For the House and immediate surrounds, manage the character of the subject site, which is that of a subdivided rural estate, to maintain the dominance of the homestead on the knoll surrounded by landscaped gardens, recreational areas, service buildings and open paddocks punctuated by the straight paddock track from Oran Park Drive. This includes conserving the original setting which relates to the topography, open space towards South Creek and distant views in the vicinity of the house.	C (Refer to Section 4.0 of this report)
Policy 2.2	Maintain an appropriate heritage curtilage to ensure the significance of the setting of Oran Park House, its recreational areas, service zones (back of house) and landscape elements are conserved, maintained and easily interpreted. The SHR curtilage is appropriate and is maintained in the current proposal.	C (Refer Section 4.0 of report)
Policy 2.3	Do not obscure the significant close and distant views and vistas from various vantage points and approaches to and from the subject site. This includes views from Oran Park Township.	C (Refer Section 4.0 of repor)
Policy 2.4	Retain original and early features such as doors, windows, floors, decorative features and walls with appropriate conservation and maintenance.	сс
Policy 2.5	Undertake regular maintenance on the subject buildings, landscape features and site elements to ensure their longevity.	СС
7.3 Inter	pretation	
Policy 3.1	Maintain the interpretation of the subject site as a Gentleman's estate with a house precinct, recreational areas, service buildings and open pasture. Any future uses should assist this interpretation.	сс
Policy 3.2	Undertake and implement an Interpretation Plan and Strategy for the site. Comment: Practical and concrete strategies for interpretation would be included in an Interpretation Plan and Strategy of the site. It is the purpose of an Interpretation Plan and Interpretation Strategy to determine the themes and messages to be interpreted at the site and the best media to accomplish this. This would include Aboriginal association with the site as well as European associations to the site.	сс
7.4 Arcl	naeological Resource Management	
Policy 4.1	Ensure early fabric of the Coach House, being the first residence of the estate, is respected and retained.	Not Applicable
Policy 4.2	All sub-surface areas below and adjacent to the site buildings and features should be considered to have archaeological potential. Carefully design any new interventions to avoid any disturbance of potential archaeological items located within these areas.	
Policy 4.3	Engage a suitable heritage consultant and archaeologist to assess, record and monitor the works in the event of any disturbance having to take place. Archaeologists must meet the current Heritage Council requirements for an Excavation Director and obtain appropriate approvals, exemptions to or excavations	

	permits required under Section 57(1) or sections 139-146 of the Heritage Act 1977 prior to any excavation of areas of identified archaeological potential.	
Policy 4.4	Retain any archaeological evidence uncovered on the site in situ.	
Policy 4.5	Appropriately catalogue any archaeological finds retained in situ for future reference.	
Policy 4.6	Assemble, catalogue and safely house any archaeological finds that have been or are in the future uncovered on the site.	
Policy 4.7	Works in the Stage 6 area, especially those that affect the coach house and the area around it, should be subject to a S60 approval so that any evidence of the nineteenth- century use of the property can be recorded.	
Policy 4.8	A program of archaeological monitoring and inspection needs to be undertaken by an appropriately qualified archaeologist for works within the new proposed homestead boundary fence of Oran Park House and within a c.20m radius of the coach house.	
Policy 4.9	An archaeologist should remain on call to respond to unexpected finds in the areas outside of the proposed homestead boundary fence and the vicinity of the coach house.	
7.5 Univ	ersal Access and Fire Safety	
Policy 5.1	Provide universal access to the House where it will not have adverse impact upon the significant fabric.	Not Applicable
Policy 5.2	Only limited opportunity exists to provide access to Basement and First Floor level from Ground Floor level. Therefore any future use should be chosen in consideration of this potential limitation.	
Policy 5.3	Maintain the fire safety and egress strategy that has been prepared and implemented at the site to provide the least impact to significant fabric whilst still providing for the safe egress of occupants in the event of a fire.	
7.6 Con	servation of Significant Fabric and Spaces	Not
Policy 6.1	Unless otherwise stated in these policies, retain and conserve surviving original and early fabric and spaces, particularly fabric and spaces rated of being of exceptional or high significance (refer section 5.4 of this document).	Applicable
Policy 6.2	Precede all conservation works by thorough investigation of the building fabric and monitor the works to assess their efficacy and accuracy.	
7.7 Inter	rvention in the Fabric	
Policy 7.1	Approach changes to significant fabric with minimal intervention: as much as necessary, as little as possible.	Not Applicable
Policy 7.2	Intervention for purposes other than conservation of the fabric is to occur only in areas of moderate, little or no significance.	, ppilouble
Policy 7.3	Removal of fabric of high significance is to be contemplated only where that fabric has ceased to function and is actively contributing to deterioration in other significant fabric.	
Policy 7.4	Record all works to the subject site and buildings in accordance with NSW Heritage	

7.8 Alter	ations and Additions to Significant Fabric and Spaces	
Policy 8.1	 Confine alterations and additions to original or early fabric of the building to: the removal of intrusive elements, and elements of little significance that interfere with interpretation, where they are no longer needed the removal of elements of little or no significance that are contributing to the deterioration of original or early fabric the reinstatement where appropriate of original or early fabric that has since been 	Not Applicable
	removed and for which good evidence exists	
	 works to conserve the existing significant fabric, and fully reversible works to adapt the buildings for changing uses as required. 	
Policy 8.2	Confine alterations and additions to the house to works that are complementary and subservient to the original and early fabric.	
Policy 8.3	New elements must respect the existing aesthetic significance of the building.	
7.9 New	Work, Future Development and Use	
Policy 9.1	The policies contained within this document must be applied irrespective of the future uses of the site and buildings.	сс
Policy 9.2	Uses and activities at the site must be compatible with the retention and interpretation of the historical residential uses.	сс
Policy 9.3	The most desirable use for the site would include a prestigious residence, hospitality, offices, estate land sales office, restaurant, art gallery, health retreat or medical centre, commercial offices, in keeping with the traditional uses of the site. Refer Section 6.7.	Not Applicable
Policy 9.4	Maintain the character and integrity of the subject site and buildings as a nineteenth century gentleman's estate, modified c1939-40 and c1995, in any future development or enterprise on the site.	сс
Policy 9.5	Strictly limit and control development within and adjoining the Homestead Lot to maintain and continue to enhance the existing functions, landscape character and use.	C (Refer Section 4.0 of report)
Policy 9.6	Any future minor structures within the Homestead Lot must not diminish or overwhelm the house. The heritage significance of the house must continue to be maintained by any proposed scheme.	сс
Policy 9.7	New minor structures on the Homestead Lot must be carefully considered, be sympathetic and subservient to the house and must be easily interpretable as new work and not intrude upon the significance of the site.	Not Applicable
Policy 9.8	Any future minor structures within the Homestead Lot or within the vicinity of the Homestead Lot must be carefully considered by the appropriate authorities so that the setting of the place is maintained.	Not Applicable
Policy 9.9	In developing plans for the future use of the Homestead Lot, the significant external and internal fabric of the subject building and its views and vistas must be conserved to maintain the significance of the site. Refer to Figure 157.	C (Refer Section 4.0 of report)
Policy 9.10	The Heritage Exemption Guidelines prepared for inclusion in the gazettal on the State Heritage Register should apply to development within the curtilage but excluding the Homestead Lot. These developments are exempt from NSW Heritage Council Section 60 approvals. Refer to Figure 157, Appendix C and Appendix D.	C (Refer Sectio 4.0 of report)

	Figure 157 Figure	
7.10 Oran F Policy 10.1	The house can be adapted and upgraded to today's living standards provided the early configuration is conserved and clearly interpreted, and new interventions are	Not Applicable
Policy 10.2	sympathetic to the existing site and context. Retain the character of the house as it was renovated in the 1930s – c1940 during	
	the Robbins Period and as it still exists today.	
Policy 10.3	the Robbins Period and as it still exists today. Carefully design any new works to the house so as not to interfere with the significance of the subject building and to limit impact on significant fabric.	
Policy 10.3 Policy 10.4	Carefully design any new works to the house so as not to interfere with the	
	Carefully design any new works to the house so as not to interfere with the significance of the subject building and to limit impact on significant fabric. Retain and conserve extant significant external and internal building fabric in accordance with the levels of significance identified in Section 5.4 Grading of	
Policy 10.4	Carefully design any new works to the house so as not to interfere with the significance of the subject building and to limit impact on significant fabric. Retain and conserve extant significant external and internal building fabric in accordance with the levels of significance identified in Section 5.4 Grading of Significance of this CMP. Retain the Georgian Revival character of the house. No conservation, maintenance or new work shall alter or negatively impact on the external character	
Policy 10.4 Policy 10.5	Carefully design any new works to the house so as not to interfere with the significance of the subject building and to limit impact on significant fabric. Retain and conserve extant significant external and internal building fabric in accordance with the levels of significance identified in Section 5.4 Grading of Significance of this CMP. Retain the Georgian Revival character of the house. No conservation, maintenance or new work shall alter or negatively impact on the external character of the house. Organise any proposed new services or service upgrades related to any new uses of the house to provide minimal interference with the existing significant fabric.	
Policy 10.4 Policy 10.5 Policy 10.6	Carefully design any new works to the house so as not to interfere with the significance of the subject building and to limit impact on significant fabric. Retain and conserve extant significant external and internal building fabric in accordance with the levels of significance identified in Section 5.4 Grading of Significance of this CMP. Retain the Georgian Revival character of the house. No conservation, maintenance or new work shall alter or negatively impact on the external character of the house. Organise any proposed new services or service upgrades related to any new uses of the house to provide minimal interference with the existing significant fabric. Wherever possible, new services shall follow existing lines to minimise impact upon significant fabric and spaces.	
Policy 10.4 Policy 10.5 Policy 10.6 Policy 10.7	Carefully design any new works to the house so as not to interfere with the significance of the subject building and to limit impact on significant fabric. Retain and conserve extant significant external and internal building fabric in accordance with the levels of significance identified in Section 5.4 Grading of Significance of this CMP. Retain the Georgian Revival character of the house. No conservation, maintenance or new work shall alter or negatively impact on the external character of the house. Organise any proposed new services or service upgrades related to any new uses of the house to provide minimal interference with the existing significant fabric. Wherever possible, new services shall follow existing lines to minimise impact upon significant fabric and spaces. Install any required new services in areas and spaces of lower significance. Any new interventions to the subject building should be reversible and clearly interpreted – by means of introduced interpretive devices or by method of style of	

Policy 11.1	Undertake new plantings in accordance with currently acceptable horticultural	Not
	practices to have minimum impact on extant fabric and surrounding areas.	Applicable
Policy 11.2	Wherever possible, propagate new plant stock from existing site plantings.	
Policy 11.3	Ensure species planted on the site are in keeping with those known to have existed in the past on the site or those appropriate to the period and soils.	
Policy 11.4	Significant views and vistas should be retained. Any new plantings or structures should not obscure the cultural, historic or aesthetic significance of the place in a physical or visual way.	C Refer Section 4.0 of report
Policy 11.5	Maintain visual link between the House and South Creek.	СС
Policy 11.6	Reconstruct painted timber garden fencing – arris top rail, strand and wire netting (for rabbit proofing) and gates to inner house lot. Plant with selected hedging.	
Policy 11.7	Reconstruct rose gardens to eastern and western areas of garden.	
Policy 11.8	Any new plating's should be in accordance with available historical information refer to Figure 7.	Not Applicable
Policy 11.9	Maintain eastern paved garden adjacent to the House.	
Policy 11.10	Maintain rose gardens, pond, terrace garden design and carriage loop.	
Policy 11.11	Maintain architectural garden design features.	
Policy 11.12	Adapt south-east driveway and reinforce planting.	
Policy 11.13	Adapt southern driveway as a lane extending from the house garden.	
Policy 11.14	Maintain recreational features of the garden including swimming pool and tennis court.	
Policy 11.15	Reconstruct Tecoma arbour by removing central growth stems and keeping overarching effect.	
Policy 11.16	Allow productive garden including herb garden, orchard and olive grove.	
Policy 11.17	Subservient ancillary structures to northern back of house area could be considered to allow adaptive its re-use.	
7.12 Coact	n House	
Policy 12.1	Ensure early fabric is respected and retained in any development.	Not
Policy 12.2	The Coach House and surrounding area could be adaptively re-used to allow long- term sustainable use. Re-use in accordance with the Heritage Exemption Guidelines is exempted from approvals for appropriate works (Refer to Catherine Park Estate, Oran Park House Heritage Exemption Guidelines dated October 2014 contained in Appendix C and Catherine Park House Heritage Curtilage Public Domain Strategy dated March 2017 contained in Appendix D). Any re-use and future development that that does not meet the requirements of the Heritage Exemption Guidelines is to address the CMP and will be subject to approvals under the Heritage Act.	Applicable & CC
Policy 12.3	Allow rebuilt sections to be adapted for new uses.	
Policy 12.4	Retain and conserve early sections of Coach House brickwork and openings.	
7.13 Silo		
7.13 Silo Policy 13.1	Retain, conserve and allow adaptive reuse of the Silo for modern functions.	Not Applicable