

19 September 2023

Max Stressmeir
Senior Strategic Planner - Growth
Wollondilly Shire Council
PO Box 21
PICTON NSW 2571

Our Reference: 23-0291msl2

**Re: Maldon Bridge Road and Staff Road, Maldon—Heritage
Peer Review**

Dear Max,

Wollondilly Shire Council (Council) commissioned GML Heritage Pty Ltd (GML) to undertake a peer review of the two heritage reports related to Nos 3 and 10 Staff Road, Maldon as they offer conflicting recommendations on the heritage values of the subject properties. The following review has been prepared by Léonie Masson, Associate and Historian, with strategic input from Julian Siu, Principal.

Scope of Review

This review pertains to the *Staff Road Workers House and Aboriginal Scar Tree(s)* heritage data form completed by City Plan Heritage (May 2023) as part of the Wollondilly Shire-Wide Heritage Study and the *Staff Road Workers Houses Heritage Assessment* prepared by Extent for Boral Recycling Pty Ltd (12 April 2023) to support the Maldon Planning Proposal.

This review has been undertaken in accordance with the procedures set out in the following documents:

- *Peer Review Policy* (NSW Department of Planning and Environment, October 2022);
- *Assessing heritage significance* (NSW Heritage Office, 2001); and
- *Assessing heritage significance – guidelines for assessing places and objects against the Heritage Council of NSW criteria* (NSW Department of Planning and Environment, June 2023).

The scope of this letter form report is:

- Peer review of the consistency and adequacy of the Heritage Data Form by City Plan Heritage;

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- Peer review of the consistency and adequacy of the Heritage Assessment by Extent Heritage;
- Summary of key findings of the peer review; and
- Provision of a conclusion for Council's consideration.

Limitations

This peer review is restricted to consideration of the information only contained within the two heritage documents listed above.

It excludes additional historical research and analysis. No site inspection was undertaken to validate assessments.

The review does not discuss Aboriginal heritage and the Aboriginal Scar Tree(s).

Summary of Key Findings

A summary of key findings is presented below. These matters are further discussed under 'detailed peer review' below.

In relation to the Heritage Data Form by City Plan Heritage:

- In 2022, Wollondilly Shire Council commissioned City Plan Heritage to prepare the Wollondilly Shire-Wide Heritage Study to update the existing heritage items and identify potential new heritage items for listing, including suggestions received from the community. 3 and 10 Staff Road were identified during the process as a potential heritage item for further assessment. It is unclear whether this item was suggested by the community or through historical research and site survey work.
- The assessment is based on solid research, detailed information and analysis and generally followed the appropriate *Assessing heritage significance guidelines* (2001). The assessment also utilised a good range of publicly available information sources available at the time of writing. City Plan Heritage did not have access to information held by the site owner (Boral Recycling Pty Ltd) nor did they have direct access to the properties.
- There is insufficient comparative analysis to support the findings of historical, aesthetic, technical/research, rarity and representativeness values to determine that 3 and 10 Staff Road are items of local heritage significance. The absence of a comparative analysis has adversely affected the assessment and has resulted in unsubstantiated claims.
- The heritage data form is correctly completed and is well-illustrated by historic and contemporary photographs and plans, with a substantial list of information sources cited.





In relation to the Heritage Assessment by Extent Heritage:

- Extent Heritage was commissioned by Boral Recycling Pty Ltd (Boral) to prepare a heritage assessment of 3 and 10 Staff Road which are located on a larger site at 40-45 Maldon Bridge Road and Staff Road owned by Boral. This assessment was requested by Wollondilly Shire Council as part of a Gateway assessment of the Maldon Planning Proposal.
- The heritage assessment report was prepared by qualified heritage practitioners and is in accordance with the principles of the *Burra Charter* (2013) and guidelines outlined in *Assessing heritage significance* (2001).
- The report contains a detailed review of the heritage data form prepared by City Plan Heritage. They found the assessment by City Plan Heritage was based on 'detailed historical research, and follows the appropriate guidelines for the assessment of heritage significance in NSW. The assessment includes a good understanding of the physical features at the site, and a robust discussion of the potential significance based on the information available to the authors at the time'. Extent did note there was an incomplete physical analysis and no apparent comparative analysis to support the determination of heritage values under the criteria.
- Extent Heritage undertook additional historical research with information sources supplied by the client, Boral, to verify (or not) anecdotal evidence used by City Plan Heritage when they prepared the heritage assessment and statement of heritage significance for 3 and 10 Staff Road. This enabled Extent Heritage to determine that some of the research which City Plan used to support the assessment of significance, was based on unverified anecdotal information.
- Extent Heritage prepared a detailed comparative analysis to determine the level of significance pertaining to 3 and 10 Staff Road as workers' housing and heritage listed workers' housing groups in New South Wales. A well-reasoned and sound argument was mounted by Extent Heritage to assert that 3 and 10 Staff Road was unlikely, or does not, meet the threshold for listing at a local level under several criteria, namely, historical, aesthetic, research/technical, rarity and representativeness values.
- Extent Heritage undertook a site visit in December 2022 and provided a well-illustrated and detailed physical analysis (exterior, interior, condition, streetscape and surrounding area and analysis of fabric) of 3 and 10 Staff Road. The consultants have mounted an effective use of their fabric analysis to assert that 3 and 10 Staff Road are not exemplars of their typology, nor designed or associated by a significant architect/builder, and do not have rarity value as workers' housing and consequently do not meet the threshold for listing at the local level under the NSW heritage criteria.
- Following a detailed re-assessment of the heritage values of 3 and 10 Staff Road, Extent Heritage prepared a revised Statement of Significance which is based on new





and additional information and a rigorous and robust heritage assessment process by qualified heritage professionals.

Conclusion

Having reviewed the Heritage Data Form by City Plan Heritage and the Heritage Assessment Report by Extent Heritage, we conclude that:

- GML had access to the heritage data form prepared by City Plan Heritage and were not provided with the whole Heritage Study report. Consequently, we cannot determine the scope and limitations of the brief, especially in regard to historical research, site surveys and physical analysis and comparative analysis.
- City Plan Heritage followed correct guidelines to prepare a solid and well-researched heritage inventory form in accordance with standard process for a LGA heritage study.
- However, Extent Heritage benefited from greater access to the site and documentary resources not publicly available. This allowed Extent to prepare a more detailed heritage assessment which comprised a detailed peer review of the heritage data form by City Plan Heritage, a comprehensive physical analysis, additional historical research, a comparative analysis of buildings of a similar typology and a thorough reassessment of heritage significance under the NSW standard criteria.
- The conclusions of the Extent Heritage report that the Staff Road Workers Houses (3 and 10 Staff Road) does not meet the threshold for local significance is based on a robust and rigorous heritage assessment.
- We concur with Extent's assessment that the 'Staff Road Workers Houses and Aboriginal Scar Tree(s)' (3 and 10 Staff Road, Maldon) does not meet the threshold for heritage listing and would not warrant listing on Schedule 5 of the Wollondilly Shire Local Environmental Plan (LEP).
- We would recommend that Council amend the Heritage Study report to remove the nomination of the 'Staff Road Workers Houses and Aboriginal Scar Tree(s)' in the public exhibition of the Wollondilly Shire-Wide Heritage Study.

Yours sincerely,

Léonie Masson

Associate/Historian

GML Heritage Pty Ltd





Detailed Peer Review

Review of the Heritage Data Form prepared by City Plan Heritage

The following table reviews the adequacy of the information contained in the draft heritage data form prepared by City Plan Heritage in May 2023 in regard to the Staff Road Workers Houses and Aboriginal Scar Tree(s).

This peer review of the heritage data form was taken to determine whether the conclusions are well founded and based upon adherence to procedural steps undertaken when assessing heritage significance.

Heritage Data Form Reference	GML Commentary
Items Details	
<ul style="list-style-type: none">• name of item• item/type• item group• item category• street address, LGA, location• ownership• current and former use	Sufficient
Statement of Significance	Insufficient The statement of significance is based upon a heritage assessment with unsubstantiated claims under one or more of the seven criteria.
Level of Significance	No comment
Description	
Designer	N/A
Builder/Maker	Sufficient
Physical Description	Sufficient. Heritage Data Form based on inspection from public domain only.
Physical condition and Archaeological potential	Sufficient
Construction years	No comment
Modifications and dates	Sufficient





Heritage Data Form Reference	GML Commentary
	<p>Does not refer to date range of all workers cottages constructed at the concrete works given all of the houses originally constructed for the company are listed in this section. Would have provided useful contextual information drawn from historical overview.</p> <p>Would recommend additional information to understand the integrity (or otherwise) of the workers' cottage such as date and brief description of works undertaken. Having the additional dates and description supports a more robust assessment of significance and statement of significance.</p>
History	<p>Consultants utilised a good range of documentary resources in preparing a good site history, including primary and secondary sources identified through desktop research and local history repositories.</p> <p>History based on information sources available to the author at time of research and in the public domain. The owner of the property is likely to have information which could have altered the assessment of significance and statement of significance, but this additional research was likely to fall outside the scope of the Shire-Wide Heritage Study.</p>
Themes	No comment
Application of Criteria	
Historical significance	<p>Sufficient but needs additional information outlined in the discussion. Assessment under this criterion is based upon detailed historical research conducted at the time of preparing the assessment and which was readily available to the author(s).</p> <p>Some of the discussion about the builder is more suited to assessment under Criterion B (Historical association significance).</p> <p>Further research is needed to verify if Vern Wrightson and Paddy Glover were workers at the newly built Metropolitan Cement Works rather than 'likely workers'.</p> <p>Recommend discussion of Arthur Miller's contribution to construction of workers cottages under criterion (b) Historical association significance.</p>
Historical association significance	No comment
Aesthetic significance	<p>The assessment provided under this criterion is overall a physical description of the place(s). It does not provide sufficient evidence to support the finding that <i>'the workers cottages at Nos 3 and 10 Staff Road are good examples of post-war fibro-sheeted residences that were widely constructed across New South Wales'</i> and not restricted to workers cottages.</p> <p>There is no discussion of the typology and how this is signalled by the fabric and form. As the inspection of the place was carried out from the public domain there is no supporting evidence for the assertion that <i>'the original floor layout of No 10 has been respected, with very few apparent modifications'</i>. Only one building</p>





Heritage Data Form Reference	GML Commentary
	plan was located during historical research (image 18) which is 'potentially for alterations to 3 Staff Road'.
Social significance	No comment.
Technical/Research significance	No comment. The inventory form makes recommendations on potential archaeological issues.
Rarity	<p>According to <i>Investigating heritage significance</i> (2021) rarity 'relates to the ability of the item to be an exceptional example or rare survivor of its kind'.</p> <p><i>Assessing heritage significance</i> (2001) provides guidelines for determining if an item possesses uncommon, rare or endangered aspects of either NSW's or the local area's cultural or natural history. Guidelines for inclusion are as follows:</p> <ul style="list-style-type: none">• Provides evidence of a defunct custom, way of life or process• Demonstrates a process, custom or other human activity that is in danger of being lost• Shows unusually accurate evidence of a significance human activity• Is the only example of its type• demonstrates designs or techniques of exceptional interest and• Shows rare evidence of a significant human activity important to a community <p>Guidelines for exclusion are:</p> <ul style="list-style-type: none">• Is not rare• Is numerous but under threat <p>City Plan Heritage concluded that the workers' cottages have rarity values for the site as follows: '<i>are the only surviving workers' cottages associated with the Metropolitan (now Maldon) Cement Works as all other dwellings along Staff Road and Park Drive have been demolished</i>'.</p> <p>With regard to the assessment that 'They are rare in the context of Wollondilly Shire associated with workers housing of industrial plants dating from the Post-War period' City Plan has not provided evidence by 'by comparison with other like items or by proving that there is no documentation on similar items'. This is an unsubstantiated claim with no supporting documentation or reference to the thematic history of the LGA.</p>
Representativeness	There is no evidence on the heritage data form that City Plan conducted a comparative assessment used in conjunction with the guidelines for inclusion or exclusion provided for in <i>Assessing heritage significance</i> (2001). To determine if an item has





Heritage Data Form Reference	GML Commentary
	<p>representativeness values at State or local levels can only be determined by comparison with other like items.</p> <p>City Plan Heritage have made unsubstantiated claims under this criterion that the workers' cottages '<i>are good surviving examples of post-war fibro-cement houses constructed for workers at the Metropolitan Cement Works in 1950, and across the State</i>', but have not provided evidence to support the assertion that they have representative values 'across the State'.</p> <p>The absence of a comparative analysis weakens the claims asserted under this criterion.</p>
Integrity	<p>City Plan have assessed the workers' cottages as 'substantially intact regardless of the later additions which are sympathetic to the original form and materials'. This is an unsubstantiated claim not supported by documentary or physical evidence from the inspection.</p> <p>It is not possible to assert integrity values solely based on the visual inspection of the exterior from the public domain.</p>
Heritage Listings	No comment
Information Sources	Extensive list and good variety of documentary sources consulted in preparation of the Heritage Data Form.
Recommendations	Satisfactory based upon the assessment findings.
Source of this information	Satisfactory
Images	<p>Appropriate selection of contemporary photographs of the buildings in question and historical maps and photographs of the site demonstration the history and evolution of the site.</p> <p>Includes contextual photographs of other staff workers houses on the broader site of the present Boral Recycling Pty Ltd site.</p> <p>Caption does not indicate specific address of cottage in image 10. Similarly, image 21 does not have full address noted in caption.</p> <p>Image 19 needs to have similar boundaries as shown in image 17 for improved comparison of development of workers cottages on wider study site.</p>





Review of the Consistency and Adequacy of the Extent Heritage Assessment

The following table reviews the adequacy of the information contained in the Heritage Assessment prepared by Extent Heritage in April 2023 in regard to the Staff Road Workers Cottages.

The Heritage Assessment report by Extent Heritage was assessed against the previous edition of *Assessing Heritage Significance* (Heritage Office and Department of Urban Affairs and Planning 2002).

The aim of the table is to identify any gaps in the information contained in the Extent Heritage report, and to determine whether the conclusions are well founded and based upon adherence to procedural steps undertaken when assessing heritage significance.

Section	Peer Review of the Heritage Assessment	
	Status	GML Commentary
Step 1 – Summarise what is known about the place of object		
Essential information includes:		
First-hand knowledge of the place or object, including its form and fabric	Sufficient	A site visit was undertaken by the author(s) of the report on 15 December 2022. Report prepared for owner of the site (including 3 and 10 Staff Road) - Boral Recycling Pty Ltd.
Description of the place or object and its setting	Sufficient information provided	Detailed exterior and interior description based on site visit to 3 and 10 Staff Road on 15 December 2022. Author(s) notes in Limitations 1.5 that 'the interior of 10 Staff Road was only partially inspected. The second bedroom, bathroom and laundry and rear yard were not inspected'. No 3 Staff described in detail in Section 2.1, exterior 2.1.1, Interior 2.1.2, condition 2.1.3 and photographs 2.1.4. 10 Staff Road described in detail in Section 2.2, exterior 2.2.1, Interior 2.2.2, condition 2.2.3 and photographs 2.2.4. Report notes rear of the house not accessible during site inspection. Streetscape and surrounding area 2.3 plus photographs 2.3.1. Report provides analysis of fabric at 2.4. Acknowledges that 3 Staff Road retains a 'moderate degree of integrity', while 10 Staff Road retains a 'high degree of integrity'.
Its historical and physical context	Sufficient	Additional targeted historical research undertaken by Extent Heritage, particularly to rebut some historical information and unsubstantiated claims made by City Plan, are





Section	Peer Review of the Heritage Assessment	
	Status	GML Commentary
		<p>detailed in Chapter 4 of the report. The report includes detailed review of information sources referenced on City Plan's heritage data form and statements made in that assessment based on desktop historical research.</p> <p>This report provides additional historical images not included in Heritage Data Form which Extent acknowledges 'do not add any additional information relevant to 3 and 10 Staff Road' apart from showing the broader site development. Images supplied by the client, not available to City Plan Heritage when they prepared the Heritage Data Form for the Wollondilly Council.</p>
Historical themes relevant to the place or object	Sufficient	
Maps, plans, photos and other documents	Sufficient	
Step 2 – Describe the evolution and details of the place or object, its previous and current uses, its associations with individuals or groups and its meaning for those people		
Archaeological potential	No comment	Archaeological assessment is outside the scope of the report.
Community and/or key stakeholder values (including associations and connections) of the place or object over time	Sufficient	
Oral histories of the people associated with the place or object	Sufficient	Author(s) of the report interviewed the site owner and former staff of the cement works to rebut claims made in the Heritage Data Form prepared by City Plan Heritage.
Documentation and analysis of the physical material/fabric of the place or object (where it has physical attributes rather than intangible values)	Sufficient	
Step 3 – Conduct a comparative analysis of the place or object against similar ones		
Identify which criteria are relevant to the place or object and which are not	Sufficient	





Section	Peer Review of the Heritage Assessment	
	Status	GML Commentary
Record and explain why the place or object is important under each criterion	Sufficient	
Step 4 - Assess significance using the criteria		
Identify which criteria are relevant to the place or object and which are not Record and explain why the place of object is important under each criterion	Sufficient	The level of significance of the site was identified against the criteria established in <i>Assessing Heritage Significance</i> (2022). The report clearly states, through an analysis of significance of the site against each of the criteria, that the sites do not meet the threshold for listing at a local level.
Step 5 – Consider the integrity and condition of the place or object		
Significance can be affected by: <ul style="list-style-type: none">the integrity, nature and/or condition of a place or object, the authenticity of a place or object, and the sources of information associated with it (UNESCO 2021)the extent to which alterations, demolition of fabric and additions have impacted on readability of a place or object, including level of intrusiveness and reversibility of such alterationsthe extent to which the alterations or additions have contributed to the significance of the place (for example, expanding its historic use or adaptation to a new use)the existing context of the place or object, including	Sufficient	The report considers the condition of 3 and 10 Staff Road in Sections 2.1.3 and 2.2.3 based upon a site inspection undertaken on 15 December 2022. The physical description identifies alterations and additions to the two houses. The text is supported by a sufficient and appropriate number and location of photographs of the exterior and interior views. The existing context of the place(s) is detailed in 'Streetscape and surrounding area' in Section 2.3 and supported by suitable photography.





Section	Peer Review of the Heritage Assessment	
	Status	GML Commentary
whether it remains within its original context, for example, its original environment, use or collection.		
Step 6 – Determine the place or object’s level of heritage significance		
State significance means significance for NSW. Local significance means significance within a local context, or for the local area or local community.	Sufficient	Extent Heritage carried out a detailed comparative analysis in Section 5 for heritage listed post-war staff housing groups and heritage listed staff housing groups to understand the significance of the subject buildings in the local or state context. The extensive comparative analysis disproves the rarity and representative values attributed to the workers’ cottages by City Plan.
Step 7 - Prepare a succinct statement of heritage significance.		
The statement of heritage significance summarise and distils the important values of the place of object.	Sufficient	The author(s) have prepared a revised statement of significance in accordance with the procedures outlined as steps 1-6 of Assessing Heritage Significance.
Step 8 – Get feedback		
Check the views of the owner or manager of the place or object.	Sufficient	Report had two iterations (draft and final) reviewed by the client, Boral Recycling Pty Ltd.
Seek comments from the individuals, groups and institutions that have provided information for your assessment.	Sufficient	Final report presented to Wollondilly Shire Council for consideration as part of the Maldon Rezoning Planning Proposal.
Determine what feedback is appropriate and accurate to include in your significance assessment.	Unclear	
Step 9 – Write up all your information		
If you are preparing a nomination for listing complete a nomination form or inventory sheet for the item.	N/A	





Comparison of components of heritage assessments

The following table provides a comparison of the relative components of the two heritage assessments using the Peer Review Checklist.

Component	Heritage Data Form - City Plan Heritage (May 2023, p 122)	Staff Road Workers Houses Heritage Assessment - Extent Heritage (12 April 2023)
Structure	<p>Heritage assessment conforms to the heritage data form format for public exhibition in conjunction with the Wollondilly Shire-Wide Heritage Study.</p> <p>All fields on the form completed as required and based upon the procedures laid out for a heritage study commissioned by a local council.</p>	<p>The report was prepared in accordance with the guidelines set out in <i>Assessing heritage significance</i> (DPE 2023) and the principles and definitions set out in the guidelines to <i>The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance</i> (the <i>Burra Charter</i>) (Australia ICOMOS 2013).</p>
Content	<p>The heritage data form has been prepared by appropriately qualified experts, namely Kerime Danis and Asmita Bhasin of City Plan Heritage.</p>	<p>The heritage assessment was prepared by Lisa Trueman, Principal Heritage Adviser and Gabrielle Harrington, Heritage Advisor, both of Extent Heritage, qualified experts..</p>
Documentary evidence	<p>City Plan Heritage undertook detailed historical research including primary and secondary sources such as land titles, aerial and contemporary photographs, newspapers, books and publications.</p> <p>The historical notes section provides a good history of the development of the site commencing in 1949 by Metropolitan Portland Cement and provides important historical context and site specific history of 3 and 10 Staff Road. The narrative contained in this field of the data form includes quotes and source citations.</p> <p>The heritage data form also contains a lengthy list of information sources.</p>	<p>During preparation of the heritage assessment, Extent Heritage were able to review the information sources used by City Plan to prepare the Heritage Data Form.</p> <p>With the benefit of an existing history and list of sources, Extent undertook additional historical research building 'on the historical notes provided in Council's draft heritage assessment'. Accordingly the author(s) were able to locate additional information on the overall site history including photographs and documents supplied to them by the owner of the property, Boral Cement Ltd.</p> <p>One such source, not publicly available, is <i>1948 Onwards-The History of Blue Circle Southern Cement, Maldon NSW</i>.</p> <p>Extent acknowledges that the additional images 'do not add any additional information relevant to 3 and 10 Staff Road', but rather the extra graphics illustrate the historical context of the site and add to the existing historical</p>





Component	Heritage Data Form - City Plan Heritage (May 2023, p 122)	Staff Road Workers Houses Heritage Assessment - Extent Heritage (12 April 2023)
		notes provided in the heritage data form prepared by City Plan. The documentary evidence was used to understand the history and development of 3 and 10 Staff Road and support physical analysis, comparative assessment and assessment under the seven criteria. 6
Physical evidence	<p>The author(s) of the heritage data form inspected the two houses from the public domain in 2022. There was no access to the interiors and the external spaces not visible from the public domain.</p> <p>The physical description provides a satisfactory examination of the facades visible from the public domain including the building materials used in foundations, exterior walls and roof, and the visible building elements such as fenestration, steps, stair railings and pathways.</p> <p>The physical description provided, while sufficient to describe the main principal elements of the exterior appearance from the public domain, is not adequate for a robust assessment of significance under the <i>Assessing Heritage Significance</i> guidelines as it excludes an analysis of the interior of the two buildings to understand their condition, intactness and integrity.</p>	<p>The author(s) conducted a site visit to 3 and 10 Staff Road on 15 December 2022.</p> <p>This chapter of the report contains a detailed description of the exterior and interior of the two houses with the exception of the second bedroom, bathroom and laundry and rear yard of 10 Staff Road.</p> <p>The detailed description of each house is detailed under the subheadings 'exterior', 'interior' and 'condition' supported by numerous photographs documenting the site visit.</p> <p>The physical analysis also describes the streetscape and surrounding area and concludes with an analysis of fabric of the two buildings.</p> <p>The physical analysis undertaken by Extent Heritage concluded that 3 Staff Road retains a moderate degree of integrity and 10 Staff Road retains a high degree of integrity through the retention of much of its original fabric and form. These findings are supported by the evidence provided.</p>
Assessment of significance	<p>The assessment of significance generally follows the procedures laid out in <i>Assessing heritage significance</i> (2001), the guidelines endorsed by the Department of Planning and Environment at the date of preparation of the heritage data form and shire heritage study.</p>	<p>Extent Heritage has undertaken a thorough review of the heritage assessment prepared by City Plan in the form of a heritage inventory form.</p> <p>In preparing the new heritage assessment Extent undertook a detailed exterior and interior physical analysis of 3 and 10 Staff</p>





Component	Heritage Data Form - City Plan Heritage (May 2023, p 122)	Staff Road Workers Houses Heritage Assessment - Extent Heritage (12 April 2023)
	<p>There is no evidence on the heritage data form prepared by City Plan that 3 and 10 Staff Road have been assessed using the guidelines for inclusion and exclusion which entails a comparative analysis, an important step in determining if an item meets the threshold for listing under the criteria.</p> <p>Consequently there are unsubstantiated claims in more than one of the SHR criteria, including historical (a), aesthetic (c), technical/research (e), rarity (f) and representativeness (g).</p> <p>3 and 10 Staff Road <i>could</i> have some significance under criterion (a) to assert that the workers' cottages are 'important in the course, or pattern of the local area's cultural or natural history', but this has not been proven by comparison with other like items (comparative analysis).</p> <p>Assessment of value under aesthetic significance (c) is based upon a site inspection from the public domain only in conjunction with documentary research of information readily available in public sources. The assessment appears to have not used the guidelines for inclusion and exclusion and has not been determined by comparison with other like items. At a minimum the assessment of 3 and 10 Staff Road could 'exemplify a particular taste, style or technology' but equally there is no evidence provided to rebut the four guidelines for exclusion. For instance, that the item 'is not a major work by an important designer or artist', 'has lost its design or technical integrity', 'its positive visual or sensory appeal or landmark and scenic qualities have been more than temporarily degraded' and lastly 'has only a</p>	<p>Road, carried out additional historical research including material supplied by the owner of the site and carried out a comparative analysis of purpose-built workers housing in the Sydney region and wider NSW listed in local environmental plans.</p> <p>Section 6.3 of the report comprises a thorough assessment of significance of 3 and 10 staff Road using the standard criteria in accordance with the <i>Assessing heritage significance guidelines</i> (2001) which were current at the time.</p> <p>For each of the seven standard criterion, Extent have reproduced the City Plan assessment prefaced by the reasons for inclusion and exclusion followed by a revised assessment explaining in detail why 3 and 10 Staff Road do not reach the threshold for listing.</p> <p>Criterion (a) – Extent justifies their position fully under this criterion whilst acknowledging 3 and 10 Staff Road have <i>some</i> historic value. The commentary clearly articulates the reasons the two cottages do not meet the threshold for listing.</p> <p>Criterion (b) – Extent concurs with City Plan heritage assessment that there is no specific historical association significance.</p> <p>Criterion (c) – asserts that the 3 and 10 Staff Road are 'typical surviving examples of post-war fibro-sheeted residences' built especially for workers across New South Wales. Extent have used the exclusion guidelines to provide a robust argument that the two houses do not meet the threshold for listing for the following reasons: they are standard designs; they are not designed by a notable architect or</p>





Component	Heritage Data Form - City Plan Heritage (May 2023, p 122)	Staff Road Workers Houses Heritage Assessment - Extent Heritage (12 April 2023)
	<p>loose association with a creative or technical achievement’.</p> <p>The assessment under Criterion (d) is irrelevant as it refers to archaeological potential on the site of the demolished houses in Staff Road and Park Drive. 3 and 10 Staff Road are not mentioned.</p> <p>City Plan Heritage concluded in critierion (f) that the workers’ cottages have rarity values for the site as follows: <i>‘are the only surviving workers’ cottages associated with the Metropolitan (now Maldon) Cement Works as all other dwellings along Staff Road and Park Drive have been demolished’</i>. With regard to the assessment that ‘They are rare in the context of Wollondilly Shire associated with workers housing of industrial plants dating from the Post-War period’ City Plan has not provided evidence by ‘by comparison with other like items or by proving that there is no documentation on similar items’.</p> <p>The assessment under critierion (g) likewise suffers from a lack of supporting documentation and comparative analysis. This is an unsubstantiated claim of representativeness values, especially in regard to being good surviving examples of post-war fibro-cement houses ‘across the State’.</p> <p>Integrity – City Plan asserts that 3 and 10 Staff Road are ‘substantially intact’ and does note that the houses have been subject to alterations. The assessment is based upon a site inspection from the public domain only. The integrity and condition of the buildings and their curtilage cannot be judged solely on a visual assessment of the principal street facing facade.</p>	<p>erected by a notable builder; have lost their integrity as part of a much larger group of staff houses on the site; do not demonstrate a high degree of creative or technical achievement; and lastly are located on private property and are not visible from the public domain.</p> <p>Criterion (d) – Extent concurs that 3 and 10 Staff Road are unlikely to meet the threshold for listing under this criterion.</p> <p>Criterion (e) – Extent provide two well-reasoned justifications under the guidelines for exclusion why 3 and 10 Staff Road are unlikely to meet the threshold for listing under this criterion. For instance they are typical fibro cottages from the post-war period and as a group ‘unlikely to yield any new construction or technical information not already well documented’. As no historical archaeological assessment has been undertaken there is evidence there is no potential on the site of the demolished houses on Staff Road and Park Road to yield substantial archaeological information.</p> <p>Criterion (f) – Extent gives a well-reasoned argument that 3 and 10 Staff Road do not meet the threshold for listing. The report asserts that the two houses are not rare in design or construction technique, and that demolition of 3 and 10 were historically significant as part of the group of staff houses with integrity lost due to demolition and loss of integrity of the group. The revised assessment is also rightly based on a comparative analysis that found staff housing groups is not rare in NSW, and located numerous examples of staff cottages and groups that are heritage listed.</p>





Component	Heritage Data Form - City Plan Heritage (May 2023, p 122)	Staff Road Workers Houses Heritage Assessment - Extent Heritage (12 April 2023)
		Criterion (g) – Revised assessment uses a comparative analysis of similar examples to argue that 3 and 10 Staff Road are not ‘good’ surviving examples of post-war fibro-cement houses constructed for workers at the Metropolitan Cement Works in 1950’.
Statement of Significance	<p>The Statement of Significance (SOS) was based on solid research and detailed information and analysis and followed the appropriate Assessing heritage significance guidelines (2001).</p> <p>The SOS, a succinct statement of the item(s) heritage significance, relied on publicly available information sources that were available at the time of writing and which may have not been correct or accurate.</p> <p>The assessment is also missing a comparative analysis that ‘considers the set of similar items’ to determine heritage significance. Consequently the SOS contains unsubstantiated claims respecting the finding of local heritage significance of 3 and 10 Staff Road.</p>	Following a rigorous significance assessment of 3 and 10 Staff Road, and a peer review of the SOS prepared by City Plan, Extent has provided a revised SOS based on a robust and well—reasoned argument and determined that the two cottages do not meet the threshold for listing at the local level under and of the standard NSW heritage criteria.

