

31 January 2023
Ref No: 4063-1047

The General Manager
Bellingen Shire Council
Po Box 117
Bellingen NSW 2454

Attention: Mr Michael Coulter

Dear Michael

DA 2022/00130 (PAN-271802) Bellingen Affordable Housing Project Stage 2 – Response to Request for Information

I refer to councils request for additional information on the abovementioned Development Application received via the NSW Planning Portal on the 16 January 2023 which advised that:

The Council's Heritage Adviser is preparing her comments on this development application. She has noted that the Statement of Heritage Impact dated 20 June 2022 prepared by Eco Logical only considers Stage 1 and not Stage 2. Whilst the document references both stages as the "study area" I think it's fair to say that it does not directly address the heritage impacts of stage 2. Can you please provide an updated Statement of Heritage Impact which directly addresses stage 2?

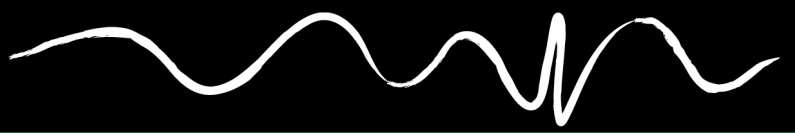
I also refer to the Heritage Referral Report prepared by Council's Heritage Advisor which provides commentary on the designs and five recommendations for design changes.

Please find enclosed a copy of the Statement of Heritage Impact (SoHI) Report for the Stage 2 component of this development. The SoHI:

- Assesses the heritage impacts of the proposal;
- Responds to comments and recommendations made by Council's Heritage Advisor; and
- Recommends changes to the current design in order to mitigate to mitigate the impact of the proposals mass on the surrounding residential area.

The proponent would also like Council to understand implications of some of the recommendations contained in the Heritage Advisors report which will have significant impacts on the viability of the project. The Royal Freemason Benevolent Institute (RFB) has advised that the reduction of the height of the Stage 2 Building from three storeys to two storeys will effectively render the entire project unviable. As outlined in the SoHI, the Project is tied to funding which requires the provision of a minimum yield to comply with conditions of the grant. This is based on having enough residents or beds to make service delivery economically viable and to ensure that residents can develop their own support networks.

The site has been selected as it is within walking distance to the commercial centre of Bellingen including the supermarket and chemist, has access to a range of community spaces for recreation including the tennis courts, swimming pool and Connell Park and is in close proximity to the



Hospital and other government services including the Library and Post Office. A detailed planning analysis and feasibility assessment has demonstrated that social housing is the highest and best use of the site and the total number of beds are required to meet the identified social housing needs in the community.

The design of the building has also been based on various site constraints including the need to build the ground floor at the General Flood Planning Level. The RFBI is willing to make some design changes to the project to address the comments and recommendations and these are outlined in the attached SoH. If these design changes are acceptable to Council, then amended plans will be prepared and submitted to Council. However, the reduction in height of the proposed three-story building to two storeys is not supported by the proponent for the reasons outlined above.

Should you require any further information please contact me on 0419 237 981.

Yours sincerely

GeoLINK

Simon Waterworth

Director / Town Planner



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BELLORANA AFFORDABLE HOUSING PROJECT
(STAGE 2), BELLINGEN, NSW
STATEMENT OF HERITAGE IMPACT

JANUARY 2023

RFBI





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ABBREVIATIONS

BSC	Bellingen Shire Council
CMP	Conservation Management Plan
CP	Conservation Policy
DCP	Development Control Plan
EP&A	Environmental Planning and Assessment Act (1979)
HAAP	Heritage Asset Action Plan
HIA	Heritage Impact Assessment
LEP	Local Environment Plan
LGA	Local Government Area
RFBI	Royal Freemasons Benevolent Institution
SEPP	State Environmental Planning Policy
Site	15 Watson Street (Lot 1 DP863743) and 4 Rawson Street (Lot 4 DP21520) Bellingen NSW
SoHI	Statement of Heritage Impact
SOS	Statement of Significance

1. INTRODUCTION

1.1 Project Background

Heritage Management and Planning Pty Ltd has been commissioned by the Royal Freemasons Benevolent Institute (RFBI) to provide a Statement of Heritage Impact (SoHI) to support the development application for the proposed Bellorana Affordable Housing Project (Stage 2), located at Watson and Rawson Streets, Bellingen NSW (see **Figure 1** and **Figure 2**) (the Site). The Site is located beside the Bellingen General Conservation Area and is adjacent to O'Sullivan's Park which is listed as an item of local heritage significance on the Bellingen Local Environment Plan (2010).

The Bellorana Affordable Housing Project (Stage 1) has been approved by Council (DA 2022/00086) and included a SoHI which concluded that the proposal would not have a significant impact on the heritage values of the Bellingen General Conservation Area (EcoLogical Australia 2022). The current Development Application (DA2022/000130) has been subject to a report by Bellingen Shire Council's Heritage Advisor, Ms Deborah Wray, who has made the following conclusions (Wray 2023: Section 6.0):

A review of the surrounding site context, heritage listings and adjoining Heritage Conservation Area identifies elements which make up this local character has been provided. The area has an established built character with a predominance of single storey traditional dwellings in a leafy landscaped setting. This includes several contributory historical single dwellings on traditional lots, and although most are not formally protected, they are representative of similar historic properties located within the adjoining Conservation Area. With the exception of the adjoining Bellorana two storey development, single storey traditional weatherboard, hipped and gabled cottages and some infill low set brick dwellings are the predominant built form around the subject site.

It is therefore considered that the proposed development in terms of its three-storey height, bulk, form, high site coverage, reduced setbacks, material finishes and colour palette, is not sympathetic to the character of the local site context.

The report additionally made the following recommendations:

- Graduation and variation of height, stepping back from the street frontages and use of a more complex hipped and gabled roof form which better reflects the building height plane profile,
- Reduction of the height and bulk of the buildings, with a maximum two storey height,
- Variation in the form of the three buildings to provide a less 'barrack like' appearance to the development,
- Retention of the existing mature trees within the front and side setbacks, and detailed design of the landscaping spaces to accommodate adequate canopy space for moderate sized shade trees of 8-10 metres mature size, to enhance and soften the development, commensurate with the landscaped character of the locality, and
- Provision of a revised schedule of external finishes and colours including warm neutrals, timber colours and inclusion of lightweight cladding elements, sympathetic to the character of the surrounding residential locality and adjoining Heritage Conservation Area.

The current assessment is an addendum to the EcoLogical (2022) SoHI and has been commissioned to consider and respond to the matters raised by the Bellingen Shire Council report (Wray 2023). It is noted that some design revisions have been made during this process and final drawings will be developed when matters relating the built heritage are addressed.

1.2 Description of the proposed redevelopment

The following summarises the residential apartments subject to the assessment:

The new affordable housing will consist of a three 3-storey building to accommodate a total of 12 one bedroom units and six two-bedroom units. The buildings are designed in an arrangement with the two bedroom unit building occupying the western part of the site, and the two one-bedroom unit buildings occupying the eastern part of the site (facing north and south).

A central axis runs from north to south, providing pedestrian entry from the Watson Street frontage to the centre of the development. This central spine accommodates a lift that services all levels, a platform stair lift to comply with standards, a services area and a mailbox area on the ground level. A secondary pedestrian axis runs perpendicular to central spine in the east direction, which provides internal access to the one-bedroom buildings.

Ground level

Each one-bedroom dwelling contains the following:

- Bedroom, study, bathroom, laundry, dining, living and kitchen area (56.9m²); and
- A north or south facing balcony area (16.1 - 15.4m²).

Each two-bedroom dwelling contains the following:

- Two bedrooms, one ensuite, one bathroom, laundry, dining, living and kitchen area (76.3m²); and
- A west facing balcony area (16.2m²).

Level One and Two

Each one-bedroom dwelling contains the following:

- Bedroom, study, bathroom, laundry, dining, living and kitchen area (56.9m²); and
- A north or south facing balcony area (8m²).

Each two-bedroom dwelling contains the following:

- Two bedrooms, one ensuite, one bathroom, laundry, dining, living and kitchen area (76.3m²); and
- A west facing balcony area (10.9m²)

1.3 Authorship

The SoHI has been written by Tim Hill (BA Hons. (1998) Archaeology and Paleoanthropology, University of New England).



Figure 1: Location of the Site



Figure 2: Detail of the Site



Figure 3: Bellinghen LEP Heritage Map (Her06BA) showing the Site (Blue)



This drawing is not to be copied, reproduced, altered or disclosed in any unauthorised form without the written consent of Benson McCormack Architects. Drawings show design intent only. It is not intended to be used for construction. All works to comply with the Building Code of Australia (BCA) 2014 + AUSTRALIAN STANDARDS AS/NZS 1170:2009 + AS/NZS 1170:2015.

REV	DATE	DESCRIPTION	CHK
A	OCT 22	ISSUE FOR DA	JSN

LEGEND	CHK
AC Air Conditioning Unit	CEX Carpark Exhaust
ACC Accessible	CWM Cold Water Meter
ADR Adaptable	D Down Pipe
AHD Aust. Height Datum	DPR Diesel Pump Room
BAL Basement	F Fridge
BALC Balcony	FEK Fire Extinguisher
BED Bedroom	FHB Fire Hydrant Booster
BT Bathroom	FFL Finish floor level
COM Comm. Room	FSR Floor Space Ratio
COB Communal Open Space	GBA Gross Building Area

GBC Garbage Chute	POS Private Open Space
GBR Garbage Room	RPT Rainwater Tank
GEX Garbage Exhaust	SCN Screen
GFA Gross Floor Area	SP Sewer
GM Gas Meter	STF Storage
H Hydraulic Services	SD Study
LY Laundry	STP Stormwater Pit
M Room	SW Stormwater
MC Main Switch Board	SW Structural floor level
MSB Motor Vehicle Parking	SW Substation
NGL Natural Ground Level	TOP Top of Fence
OD Onsite Detention Tank	TOW Top of Wall
P Pantry	VIS Visitor Parking

CLIENT	PROJECT DETAILS	DRAWING TITLE	SCALE	APPROVED	NORTH
RFB Suite 2, Level 2, 2 Park Street Sydney NSW 2000	BELLORANA [STAGE 2] 15-23 Watson St Bellingen NSW 2454	ELEVATIONS - NORTH SOUTH ELEVATION	1:200	DB	

STATUS	DA	PROJECT No	DRAWING No	REV
DA	2141A	DA-0200	A	

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BENSON McCORMACK ARCHITECTURE

Figure 4: North and south (Watson Street) elevations



Figure 5: Revised west (Rawson Street) and eastern elevation

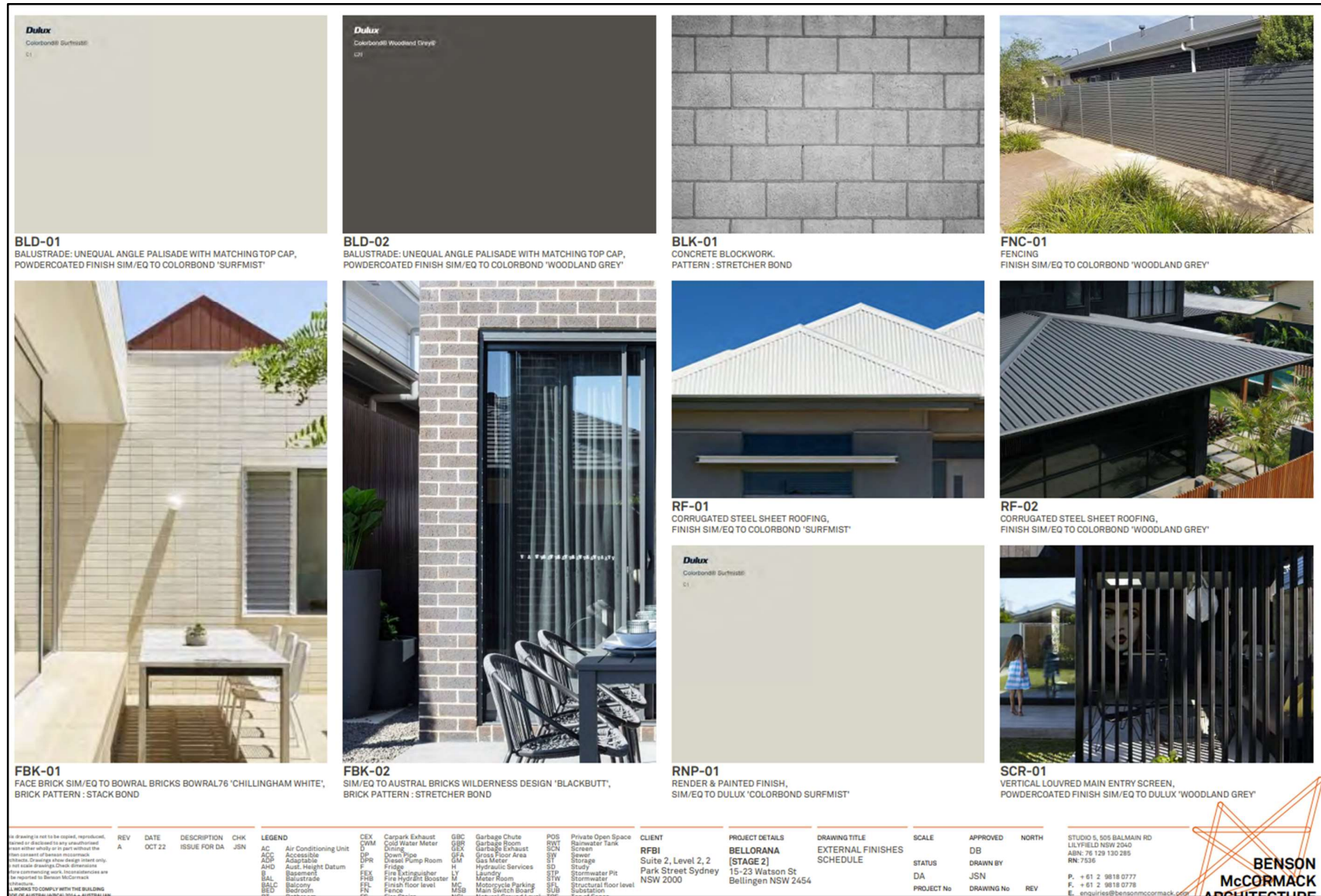


Figure 6: External finish schedule

1.4 Legislative Context

1.4.1 NSW Heritage Act (1977)

The Heritage Act 1977 (NSW) provides protection for the environmental and cultural heritage of the State, which includes places, buildings, works, relics, movable objects, or precincts that are of State or local heritage significance. The legislation focuses on identifying places of either local or state heritage significance and protecting them by registration on heritage registers. Significant historic heritage items are afforded little protection (other than at the discretion of councils) where they are not on a heritage register. Of note are the provisions allowing for interim heritage orders (Part 3), which grants the Minister or the Minister's delegates, (which importantly may include a local government agent) the power to enter a property and provide emergency protection for places that have not yet been put on a heritage register, but that may be of local or State significance.

For the purposes of the management of historic heritage in NSW the Heritage Act sets out the following management and regulation mechanisms:

- the establishment of the NSW Heritage Register which provides regulation and management of state significant items by the NSW Heritage Council where they have been assessed and formally listed on the register
- delegation of the management and regulation of items of local heritage significance to local councils and state Government agencies so long as they are listed on either a LEP or a Government agency heritage list (section 170 register), and
- management and regulation of 'relics' and archaeological sites by the NSW Heritage Council irrespective of whether the relics or archaeological sites are known or listed on a heritage register

The Heritage Act 1977 (NSW) also makes allowances for the protection of archaeological deposits and relics (Part 6). A 'relic' is defined by the Heritage Act as:

Any deposit, object of material evidence which relates to the settlement of the area that comprises NSW, not being Aboriginal settlement, and has local or state significance.

Part 6 Division 9 of the Heritage Act protects archaeological 'relics' from being 'exposed, moved, damaged, or destroyed' by the disturbance or excavation of land. This protection extends to the situation where a person has 'reasonable cause to suspect' that archaeological remains may be affected by the disturbance or excavation of the land. It applies to all land in NSW that is not included in the SHR.

Section (s) 139 of the Heritage Act requires any person who knows or has reasonable cause to suspect that their proposed works will expose or disturb a 'relic' to first obtain an Excavation Permit from the Heritage Council of NSW (pursuant to s 140) unless there is an applicable exception (pursuant to s 139(4)). Section 146 of the Heritage Act requires any person who is aware or believes that they have discovered or located a relic must notify the Heritage Council of NSW providing details of the location and other information required.

1.4.2 Environmental Planning and Assessment Act

The NSW Environmental Planning and Assessment Act 1979 (EP&A Act) and its associated regulations provide the framework for determining planning approvals for developments and activities in NSW. Environmental impacts are interpreted as including impacts to cultural heritage. The Environmental Planning and Assessment Act 1979 (NSW) requires that environmental impacts are considered in land-use planning, including impacts on Aboriginal and non-Aboriginal heritage. The EP&A Act requires councils to consider environmental effects when assessing new developments. Heritage is one of the matters for consideration. Sites of environmental heritage (including historic heritage sites and

sometimes Aboriginal heritage sites) are protected by Local Environmental Plans (LEP) and Development Control Plans (DCP) which specify the constraints on development in the vicinity of these sites.

Proposed activities and development are considered under different parts of the EP&A Act, including:

- Major projects (State Significant Development under Part 4.1 and State Significant Infrastructure under Part 5.1) require the approval of the Minister for Planning
- Minor or routine developments requiring local council consent are usually undertaken under Part 4 activities which, in limited circumstances, may require the Minister's consent, and
- Part 5 activities which do not require development consent. These are often infrastructure projects approved by local councils or the State agency undertaking the project.

The Bellorana Affordable Housing Project (Stage 2) is being assessed by under part 4 of the EP&A Act.

1.4.3 Local Environment Plans

Local Environmental Plans (LEPs) are made under the EP&A Act to guide planning decisions by local councils, including development applications. The general objectives of the LEPs are to conserve the heritage of the respective LGAs through the protection of the significance of heritage items, conservation areas, archaeological sites, Aboriginal objects, and 'Aboriginal places of heritage significance'. The LEP is the primary document which sets out the requirement for development consent for works on heritage sites.

Development consent is required for any of the following:

- a) demolishing or moving any of the following or altering the exterior of any of the following (including, in the case of a building, making changes to its detail, fabric, finish or appearance):
 - i. a heritage item
 - ii. an Aboriginal object
 - iii. a building, work, relic, or tree within a heritage conservation area
- b) altering a heritage item that is a building by making structural changes to its interior or by making changes to anything inside the item that is specified in Schedule 5 in relation to the item
- c) disturbing or excavating an archaeological site while knowing, or having reasonable cause to suspect, that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged, or destroyed
- d) disturbing or excavating an Aboriginal place of heritage significance
- e) erecting a building on land
 - i. on which a heritage item is located or that is within a heritage conservation area, or
 - ii. on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance
- f) subdividing land
 - i. on which a heritage item is located or that is within a heritage conservation area, or
 - ii. on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance

The Site is located immediately adjacent to the Bellingen General Conservation Area and is opposite O'Sullivan's Park (see **Section 2** below).

1.4.4 State Environmental Planning Policy (Housing) 2012

The Bellorana Affordable Housing Project (Stage 2) is permissible under the State Environmental Planning Policy (Housing) 2021 (SEPP). The principles of this Policy are as follows—

- a) enabling the development of diverse housing types, including purpose-built rental housing,
- b) encouraging the development of housing that will meet the needs of more vulnerable members of the community, including very low to moderate income households, seniors and people with a disability,
- c) ensuring new housing development provides residents with a reasonable level of amenity,
- d) promoting the planning and delivery of housing in locations where it will make good use of existing and planned infrastructure and services,
- e) minimising adverse climate and environmental impacts of new housing development,
- f) reinforcing the importance of designing housing in a way that reflects and enhances its locality,
- g) supporting short-term rental accommodation as a home-sharing activity and contributor to local economies, while managing the social and environmental impacts from this use,
- h) mitigating the loss of existing affordable rental housing.

The specific considerations relating to the application of the SEPP identified by the Bellingen Shire Council heritage report (Wray 2023: Section 1.0) include:

(3) Development consent must not be granted to development to which this Division applies unless the consent authority has considered whether the design of the residential development is compatible with—

- (a) the desirable elements of the character of the local area, or
- (b) for precincts undergoing transition—the desired future character of the precinct.

The following broad considerations in response to these requirements and will define the heritage assessment:

- the Site sits at the interface of the commercial precinct, the parklands of Cemetery Creek and the residential area and as such the 'local area' is more expansive than just the residential area of south Bellingen
- social housing has been identified as the highest use of the Site from a planning and commercial perspective and that the block has been used for a range of community purposes including the church, hall, school and hostel, and
- while the buildings function as accommodation they will operate as a commercial enterprise and as such have additional engineering and design requirements than residential buildings, including fire safety and thermal performance.

2 HERITAGE SIGNIFICANCE ASSESSMENT

2.1 Description of adjacent heritage items (NSW Heritage Inventory)

2.1.1 Bellingen General Conservation Area

The following description of the Bellingen General Conservation Area is provided in the NSW Heritage Inventory listing:

A historic township which retains much of its early twentieth century character. There is some early housing surviving from the late nineteenth century but the majority in the main town dates from the early twentieth century. The main street contains the majority of public and commercial buildings which are of one and two storeys. The commercial strip is closely knit with many original shop fronts, awnings and verandahs surviving. The public buildings are set back from the street alignment with green spaces in front. Mature avenues of trees adds to the aesthetic appeal and character of the town.

The historical notes include the following:

Town reserve here from 1870s. Originally known as Boat Harbour. Settlers arrived in 1870s farming small-holdings. Fernmount was originally the main centre on Bellinger River, but was superseded by Bellingen in the early twentieth century. Major land-uses were timber-getting and dairying.

2.1.2 O'Sullivan's Park

The following description of O'Sullivan's Park is provided in the NSW Heritage Inventory listing:

Small area of creek side vegetation including a stand of blue gums to about 25m and some camphor laurels. Also Canary Island palm about 13m high, located prominently on corner. Palm and eucalypt regrowth from about 1930.

2.1.3 Bellingen Park

The following description of Bellingen Park is provided in the NSW Heritage Inventory listing:

This park of almost 4 hectares, dedicated in 1887, has a generally informal layout, on a slightly sloping site, divided by small creek lines (Carratti Creek enters the park from the south before joining with Cemetery Park which enters the park from the west) but with a somewhat formal entrance (with modest brick memorial turnstile from c1950 to local identity Daniel McNally) lined with mature Canary Island (*Phoenix canariensis*) and cabbage tree palms (*Livistona australis*) from possibly the 1920's. The sports oval on the south east with utilitarian brick grandstand from c1950 tends to dominate the park.

The park is notable for its fine period planting on the north east and south east corners including bunya pines (*Araucaria bidwillii*) about 25m high and camphor laurels to 22m high (*Cinnamomum camphora*) (possibly planted c1892, as were the camphor laurels on the Council site in Hyde Street). Along the creek lines are stands of blue gums (*Eucalyptus globulus*) (to 22m) and some unidentified rainforest species. Other trees of some note are the liquidambar (*Liquidambar styraciflua*) (to 13m) and the uncommon native cypress (to about 14m). In the southwest corner is a group of tennis courts and just west is a concrete road bridge with unusual steel railings (for the Shire).

Kouri pines (*Agathis australis*). Tennis courts (2006), park facilities, amenities, mosaics, bus shelter (1996, BSC) music stage (2000, Federal Government Grant), skate facility (1996, BSC), pathways. Recent land care activities along Carroty Creek. George Hewitt Grandstand built in 1967. There was flood damage to courts in 2009.

The following historical notes are provided for Bellingen Park

Bellinghen Park, reserved since 1887, is used for sports, picnics and the monthly district market. It includes a utilitarian brick grandstand from c1950 and tennis courts (in the north-west corner). The park has a generally informal layout, divided by Carrattie and Cemetery Creeks, but with a somewhat formal entrance (with memorial turnstile gateway c1950 dedicated to local identify Daniel McNally). It is lined with mature Canary Island and Cabbage Tree palms, probably from c1930.

The finest trees are located along the northern and south-east corners, being Bunya Pines to almost 30 metres and Camphor laurels to 25 metres, probably planted about 1900. Along the creek lines towards the northern boundary, there is a fine stand of native Bluegum. While the chain wire fencing enforces admission to the oval, it has no heritage value and somewhat spoils the presentation of the park to the public. Just west of the park there is a small bridge with simple but uncommon steel railing, considered to have heritage interest.

The McNallys were a pioneering family settling in Boat Harbour (Bellinghen) in the 1860s. The memorial to Daniel V McNally is likely in memory of DV McNally, former councillor and Bellingen Shire President 1930-31, 1933, 1935, 1938 & 1942-43.

A Don Carratti is recorded as being an early pioneer to the Shire and was a noted road worker for the Shire.

The oldest of the plantings in the north-east and south-east corners (bunya pines, camphor laurels) are recorded as being planted in "1903 on the initiative of Mr & Mrs R Page and Mrs C Vale. Note: R Page was an editor of The Raleigh Sun Charles Edward Vale was born in Balmain (1863) and came to the Bellinger River when he was 17. Married Rose Ann Tyson and resided at No.8(?) William Street (Dr McLachlan's surgery 1980's). In 1902c Charles Vale bought the farm known as Hillcrest on North Bank Road where George Moore built their residence. Member of Board of Directors of the Raleigh Dairying Company he passed away in 1926).

Source: Pioneering in the Bellinger Valley, Bellingen Historical Society 2005

George Hewitt Grandstand erected(?) 1967 in recognition of his work in the beautification of the town and district (plaque on grandstand)

2.1.4 St Mary's Catholic Church Hall

The following description of St Mary's Catholic Church Hall is provided in the NSW Heritage Inventory listing:

Impressive brick church. Dated 1919. Parapet gabled front with buttresses. Square entry vestibule. Limited mouldings over openings. Circular feature window with clover leaf shaped windows either side. Gothic arched windows and doors. Diamond pattern leadlight to all windows. Smooth rendered base. Terra cotta roof tiles. Good frontages to both streets. Parapet gable returns on each side with bay below. All walls buttressed. Brick and roughcast fence with iron pipes. Well planted grounds and street verges.

Landscape: Church grounds sited on north facing hillside with prominent row of hoop pine to 25m high, being a focal point throughout the town. Also Norfolk Island pines (20m high), cypress (8m high) and a group of camphor laurels (to 12m high) and a few turpentines (to 12m).

St Mary's Hall: Large weatherboard hall. Simple gabled form. Corrugated iron roof with encircling skillion verandah (enclosed at rear). Roof is high pitched and verandah roof is also deep. Gothic style windows with pointed heads and coloured glass. Arched heads to verandah doors. Decorative timberwork to front gable. Built beside the present church. Hidden from street by more recent school building.

The historical notes include the following:

Building dated 1919.

Hall: Now used as part of school. Would have been an earlier church or church hall originally. Verandahs were added later.

The large weatherboard church was beautifully sited overlooking the town park, and was opened in January, 1911 by Bishop Carroll. The east end had a twin light east window, and was surmounted by a pretty bellcote. After the completion of the new church in 1919, the old was given over entirely to school use until the building of the new school in 1953. Various changes were made over time to give it its present day appearance. The building is still used as St Mary's Hall.

Church of St William: The first church in Bellingen was built by Father William Reade in Hyde Street, and was no doubt named after him. It was a simple weatherboard building. The church served the town until 1911, by which time Bellingen had grown significantly, requiring a larger church and a new site. The site is now part of the historic Hammond and Wheatley's Emporium building.

2.2 Site Photos



Figure 7: Existing residential dwellings looking north-east from Rawson Street



Figure 8: St Marys Church viewed from Rawson Street



Figure 9: Bungalow/ Cottage (4 Rawson Street) showing road verge and powerlines



Figure 10: Residential cottage typical of the original built form of South Belling



Figure 11: O'Sullivan Parks as viewed from the corner of Watson and Rawson Streets



Figure 12: Cemetery Creek and cottage (27 Watson Street) opposite Rawson Street



Figure 13: St Mary's Primary School looking south-west to the Site



Figure 14: St Mary's Church as viewed from Park Street

2.3 Significance assessment

2.3.1 Bellingen General Conservation Area

The following statements are provided by the NSW Heritage Inventory to understand the heritage significance of the Bellingen General Conservation Area (**Table 1**).

Table 1: NSW Heritage Assessment Criteria- Bellingen General Conservation Area (NSW Heritage Inventory).

Criteria		Assessment statement (NSW Heritage Inventory)
A	Historical	This item is assessed as historically significant locally.
C	Aesthetic	This item is assessed as aesthetically significant locally.
D	Social	This item is assessed as socially significant locally.
F	Rarity	This item is assessed as aesthetically rare locally.
G	Representativeness	This item is assessed as aesthetically representative locally.
	Integrity/ Intactness	This item is assessed as socially significant by association locally.

The NSW Heritage Inventory provides the following Statement of Significance for the Bellingen General Conservation Area:

Historic interest as a representative example of a country town established in a dairying district. The town still evokes a way of life which characterised the first decades of this century. Special architectural interest for the extant collection of buildings by George Edward Moore, a prominent designer/builder in the district. General architectural interest for its intact characteristic examples of commercial, public and private buildings. Aesthetic interest as a relatively intact collection of buildings set in an attractive landscape. The settlement contributes to an understanding of the character of an early twentieth century country town.

2.3.2 O'Sullivan's Park

The following statements are provided by the NSW Heritage Inventory to understand the heritage significance of O'Sullivan's Park (**Table 2**).

Table 2: NSW Heritage Assessment Criteria- O'Sullivan's Park (NSW Heritage Inventory).

Criteria		Assessment statement (NSW Heritage Inventory)
A	Historical	This item is assessed as historically significant locally.
C	Aesthetic	This item is assessed as aesthetically significant locally.
G	Representativeness	This item is assessed as aesthetically representative locally.
	Integrity/ Intactness	This item is assessed as historically significant by association locally.

The NSW Heritage Inventory provides the following Statement of Significance for O'Sullivan's Park
Remnant native trees along creek and Canary Island palm from c1930.

2.4 Impact Assessment

The following aspects of the design of the Bellorana Affordable Housing Project (Stage 2) are provided to understand the impacts of the residential apartments on the character of the local area:

The following aspects of the proposal respect or enhance the heritage significance of the item or conservation area for the following reasons:

- the layout includes three separate apartment blocks which are consistent with the size and scale of buildings in the commercial precinct (Hyde Street and Church Street) but retain a curtilage between blocks consistent with the historical pattern of residential development in south Bellingen
- the boundary setbacks provide an opportunity to create a greenspace between the road and the apartments to form a connection to the mature vegetation within O'Sullivan's Park and nearby Bellingen Park, and
- the face brick and glass walls provide a balance between the more traditional early 20th century painted timber cottages which typically have softer pastel / muted colours and the heavier red brick structures of St Mary's Primary School/ Church and Hyde Street which are typical of early to mid-century architecture on the NSW North Coast.

The following aspects of the proposal could detrimentally impact on heritage significance. The reasons are explained as well as the measures to be taken to minimise impacts:

Roof height and form- The roof is taller than the surrounding residential dwellings but is consistent with the buildings in St Mary's Primary School, the commercial buildings along Hyde Street and the mature vegetation within O'Sullivan's Park and Bellingen Park. The maximum roof height could have been lowered to be equivalent to a double story residential dwelling, however this would require a skillion roof that would be inconsistent with the surrounding residential and commercial area. Reconfiguring the building layout into a single large double story building would also be inconsistent with the built form of the adjacent residential area. The ridge and gable form contributes to the mass of the roof and extends above the brick walls creating vertical lines which make the buildings appear taller.

Materials and exterior palette- With the exception of timber weatherboards and hardwood fences, the apartments utilise materials which are dominant within the commercial and residential precincts and Bellingen/ South Bellingen. This includes corrugated roofing, glass (both as windows and sliding doors) and face brick walls. A important design consideration has been to reduce the visual impact of the walls when viewed from the street which has been achieved by placing the patios and glass sliding doors so that the solid brick walls form two separate tall rectangles towards the edge of the buildings. The face brick walls have been selected to absorb afternoon sunlight into the bedrooms and additionally contribute to fire protection and safety in the buildings.

Design complexity- The use of three separate blocks connected by under covered concrete walkways has significantly reduced the mass of the building when viewed from the street when compared to a lower but wider single building. As the three buildings occupy two standard residential Lots each building has a curtilage equivalent to the space between residential dwellings. This additionally serves to increase fire safety as fires can be more easily contained and residents can move more safely away from fires. The apartment blocks have a relatively austere and geometric design that are symmetrical- with the sliding glass doors breaking up the visual impact of each block. The tall rectangular geometry of the buildings is supported by the use of narrow windows and street trees that will partially cover the brick walls. The overall aesthetic of the buildings is austere which is consistent with the commercial

buildings along Hyde Street which typically utilise the basic structural elements of the building to create an architectural statement.

The following sympathetic solutions have been considered and discounted for the following reasons:

Removal of the upper (second) floor- The Bellorana Affordable Housing Project (Stages 1 and 2) is funded to provide social housing and the upper (second) floor is required to achieve the required yield to comply with conditions of the grant. This is based on having enough residents or beds to make service delivery economically viable and to ensure that residents can develop their own support networks. A key factor for the project is that the Site is within walking distance to the commercial centre of Bellingen including the supermarket and chemist, has access to a range of community spaces for recreation including the tennis courts, swimming pool and Connell Park and is in close proximity to the Hospital and other government services including the Library and Post Office. A detailed planning analysis and feasibility assessments has demonstrated that social housing is the highest use of the Site and the total number of beds are required to meet the identified social housing needs.

An important design consideration is the construction of three separate blocks of 6 residential units connected by undercover walkways as opposed to construction of a single 18-unit structure. This decision significantly reduces the amount of wall space fronting the street, the height of the roof and the mass of the roof when viewed from the street. The scale of each block is equivalent to the commercial buildings along Hyde Street and the spaces between the blocks are consistent with the curtilage between residential buildings. This setback of the building will allow for landscaping which will connect these design elements to the adjacent creek and parklands which contribute to the character of the local area. Achieving the required housing yields as a double story design would require converting the open space between the blocks to internal space which would reduce safety and amenity or reducing the boundary setbacks which would compromise opportunities for landscaping and connection to the surrounding parkland.

Skillion roof- Reducing the building height using a skillion roof has been considered and discounted as it is not consistent with either the commercial or residential buildings in Bellingen, which typically have steep to moderately steep roof pitches. St Mary's Church and Hall both have steep to very steep roof pitches and the residential dwelling at 24 Watson Street has a double ridge which has a very steep roof pitch.

Traditional and lightweight materials- The use of bricks as the dominant wall material is primarily a response to the commercial function of the buildings. The physical demands on social housing are significantly greater than residential dwellings and the choice of materials is determined by the building requirements for social housing. This includes the need for fire suppression between the units and removal of unnecessary materials which may create fire hazards. The dominant materials of residential dwellings in south Bellingen, being timber weatherboards and fibro-cement sheet, are not appropriate for social housing projects. The choice of Chillingham White face brick for levels 1 and 2 provides a balance between the heavy red bricks of St Mary's Church and Primary School and the softer muted tones of older residential dwellings. The overall design does include significant amounts of glass which reduce the impact of each block when viewed from the street and connects the buildings to the residential area.

3 STATEMENT OF HERITAGE IMPACT AND MITIGATION MEASURES

3.1 Determining an appropriate level of assessment

The NSW Heritage Office Guidelines for Statement of Heritage Impact (NSW Heritage Office 2002) includes test questions to assist in the determination of an appropriate level of assessment and supporting information. These include:

- Statement of Heritage Impact (SoHI)/ Statement of Significance (SOS)
- Conservation Policy (CP)/ Heritage Asset Action Plan (HAAP), and
- Conservation Management Plan (CMP)

The following statements are provided in response to the test questions in the SoHI guidelines.

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

The following design strategies have been adopted to reduce the impact of the Bellorana Affordable Housing Project (Stage 2) on the character of South Bellingen and the Bellingen General Conservation Area:

- identifying and responding to the main elements of the local areas, including the commercial precinct, the parklands along Cemetery Creek and the residential area of South Bellingen which includes older and more recent single and double story buildings
- utilising three separate blocks which are equivalent in scale with the commercial buildings but have a curtilage similar to residential dwellings and are tied to the parklands and creek by a mix of trees and palms which further break up the mass of the building, and
- utilising materials which meet the functional requirements of social housing but are sympathetic to the adjacent residential area and rely on the geometry of the design to create an architectural statement consistent with commercial buildings along Hyde Street and Church Street.

Why is the new development required to be adjacent to a heritage item? The Site has been subject to extensive feasibility studies and is a redevelopment of the current hostel type accommodation at the Site (Stage 1). The site provides easy access to the Hyde Street, sporting/recreational facilities and parkland and the essential Government services.

How does the curtilage allowed around the heritage item contribute to the retention of its heritage significance? The Site is immediately adjacent to the Bellingen General Conservation Area however the adjacent buildings include the old Bellorana Hostel and St Marys' Primary School which are not listed as items of local heritage significance. These buildings are consistent in scale, form, and materials with the proposed Stage 2 of the Bellorana Affordable Housing Project (Stage 2).

How does the new development affect views to, and from, the heritage item? What has been done to minimise negative effects? The roofline will be partially visible behind St Mary's School when viewed from the southern entrance of Bellingen Park (Park Street entrance) but will not obstruct views of St Marys' Church from Park Street. The roofline will be partially visible above the tree line of O'Sullivan's Park and Bellingen Park when viewed from Church Street (looking south from Williams Street intersection) and from the entrance to Bellingen Park. However, the mature canopy of the parkland is equivalent or greater in height than the roof.

Is the development sited on any known, or potentially significant archaeological deposits? If so, have alternative sites been considered? Why were they rejected? There are no known or potentially significant archaeological deposits in the vicinity of Stage 2 of the Bellorana Affordable Housing Project. The nearest known archaeological site is the old Bellingen Cemetery which is west of Church Street.

Is the new development sympathetic to the heritage item? In what way (e.g. form, siting, proportions, design)? The design of the Bellorana Affordable Housing Project (Stage 2) considered the character of the local area which includes the commercial precinct of Hyde Street, St Marys Church and Hall, the green space of O’Sullivans and Bellingin Park and the overall character of the residential area south of the Site. Design considerations include the choice of materials, the dimensions of each block and the use of landscaping to connect the three buildings to the adjacent parklands.

Will the additions visually dominate the heritage item? How has this been minimised? Stage 2 of the Bellorana Affordable Housing Project will not dominate the Bellingin General Conservation Area as it will be only partially visible from Church Street and will not be visible from Hyde Street. Views will primarily include the roofline sitting above the canopy of the trees. The surrounding area is an established residential precinct with existing buildings and as such the increment of change to south Bellingin will not be significant.

Will the public, and users of the item, still be able to view and appreciate its significance? The primary views in this portion of the Bellingin Conservation Area include Bellingin Park and St Mary’s Church. The roofline will be partially visible above the tree line of Bellingin Park when viewed south and will not impact views of St Mary’s Church from Park Street.

As the Site is not located within the Bellingin Conservation Area and is not a listed heritage item a Statement of Heritage Impact is considered an appropriate level of assessment for the Bellorana Affordable Housing project (Stage 2).

3.2 Statement of Heritage Impact

Stage 2 of the Bellorana Affordable Housing project is located outside the Bellingin General Conservation Area but is located within an area of South Bellingin which has a unique local character that includes elements of the commercial precinct, the parklands along Cemetery Creek and established residential pattern of development that dates to the late 1800’s. The Bellorana Affordable Housing Project (Stages 1 and 2) have been identified as the highest use of the Site as it is one of the very few available properties that provide walking access to Hyde Street, recreational facilities along Cemetery Creek and medical facilities at the Bellinger Valley Hospital. This is important for people who do not have access to cars and have mobility impairments. The layout of the three residential blocks, which provide supported accommodation across three levels, is a design solution that meets the yield requirements of the affordable housing grant program, complies with building safety regulations and meets the needs of the local community for social housing.

However, the following design amendments are recommended to mitigate the impact of the building mass on the surrounding residential area:

- replacement of the gable roof form with a hip and ridge form equivalent to Stage 1 to remove the long ridge and vertical lines extending above the walls (see **Figure 15**)
- articulation of the patios forward to add depth to the front facade of the buildings and provide for decorative gable roofs above each patio which will break up the horizontal line of the fascia and gutter (see **Figure 15** and **Figure 16**)
- installation of tall and narrow windows on the bedroom walls to break up the rectangular brick wall visible on each side of the apartment blocks (see **Figure 15**)
- planting taller native palm trees that will extend up to the first and second floors to partially obscure the face brick bedroom walls (see **Figure 15**), and
- Use of a darker grey mortar to break up the monotone color of the ‘Chillingham White’ face brick walls (**Figure 17**).



Figure 15: Revised design (Rawson Street)



Figure 16: Revised design (Watson Street)



Figure 17: Chillingham White Brick with darker mortar (source Pinterest)

4 REFERENCES

Australia ICOMOS

1999, *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance*, Australia ICOMOS, Burwood (revised 2013).

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2010 *Local Environmental Plan*

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2001, *Assessing Heritage Significance*, Heritage Office, Parramatta.

2002, *Statements of Heritage Impact*, Heritage Office, Parramatta.

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NSW Heritage Inventory

Bellingen General Conservation Area

<<https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=1110027>>

Bellingen Park

< <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=1110292>>

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Pinterest

Bowral Bricks in Chillingham White

<<https://www.pinterest.com.au/pin/457256168417942069/>>