

planning consultants

# **APPENDIX 6**

## STATEMENT OF HERITAGE IMPACT

Proposed re-development at Gladesville Shopping Village Gladesville NSW



 $\begin{array}{c} \textbf{HERITAGE21}\\ \textbf{CULTURAL BUILT HERITAGE IN THE 21}^{\text{ST}} \textbf{ CENTURY} \end{array}$ 

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Cultural Built Heritage in the 21<sup>st</sup> Century

Rappoport Pty Ltd ABN 76 064 687 592

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The following table forms part of the quality management control undertaken by Heritage21 regarding the monitoring of its intellectual property as issued.

Issue	Notes / Description	Date	Initials
1	Draft report (D1) issued for comment.	19/08/2015	КВ
2	Draft report (D2) issued for comment.	26/08/2015	КВ
3	Final report (R1)	28/08/2015	КВ
4	Final report (R2)	07/10/2015	КВ

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#### **1.0 INTRODUCTION**

#### 1.1 Authors

This Statement of Heritage Impact ('SOHI' or 'report') has been prepared by Paul Rappoport and Kaylie Beasley of Heritage21 (Rappoport Pty Ltd), Heritage Consultants.

#### 1.2 The site

The subject site is Gladesville Shopping Village, which occupies the corner of Cowell and Flagstaff Streets and a section of Massey Street, Gladesville. The subject site falls within the boundaries of the Hunters Hill Council local government area and is shown in Figure 1 below.



**Figure 1**. Map depicting the location of the subject site occupying the corner of Cowell and Flagstaff Streets and a section of Massey Street, Gladesville. The red boundary indicates the approximate extent of the subject site. (Source: Google Maps, www.maps.google.com.au, accessed 13 August 2015).

#### 1.3 Heritage status

#### **Subject Site**

The subject site <u>is not</u> listed as a heritage item under Schedule 5 of the *Hunter's Hill Local Environmental Plan 2012* (HHLEP). However, the Hunter's Hill Council resolved on the 22 June 2015 to include the Cottage at 10 Cowell Street, located in the south eastern corner of the subject site, in Schedule 5 of the LEP (see Figure 2).

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Both, the subject site and 10 Cowell Street <u>are not</u> listed on the State Heritage Register, the National Heritage List, the Commonwealth Heritage List, the Register of the National Estate or the Heritage Register of the National Trust of Australia.



**Figure 2**. Heritage map depicting approximate location of heritage item - 10 Cowell Street (I514), as indicated by the red arrow. (Source: Hunter's Hill Municipal Council, Heritage Map 002A, http://www.huntershill.nsw.gov.au/Page/Page.aspx?Page Id=1121, accessed 18 August 2015).

## **Conservation Areas**

The subject site is adjacent to the Hunter's Hill Conservation Area (C3), as denoted in the HHLEP. The conservation area includes, amongst others, the buildings on the northern side of Massey Street and the lots facing Victoria Road between Pittwater and Junction Street.

The subject site is also in the vicinity of the Gladesville Shopping Centre Heritage Conservation Area (C5) as denoted in the *Ryde Local Environmental Plan 2014* (RLEP). The conservation area includes buildings located on the western side of Victoria Road and Victoria Road.

#### Heritage Items in the Vicinity

Other heritage items listed in the HHLEP which are located in the vicinity of the subject site include the following:

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- House "Dunham House" 2 Massey Street (1480);and
- Bank building 219 Victoria Road (I488).

The Hunter's Hill Conservation Area (C3) and Gladesville Shopping Centre Heritage Conservation Area (C5) are shown in Figures 3 and 4, in addition to the heritage items (I480 and I488) that are located within the vicinity of the subject site.



**Figure 3**. Heritage Map depicting the Gladesville Shopping Centre Heritage Conservation Area (C5), hatched in red and the heritage listed items, indicated in brown. (Source: RLEP Heritage Map 007, http://www.ryde.nsw.gov.au/Business-and-Development/Planning-Controls/Local-Environmental-Plan, accessed 13 August 2015).



**Figure 4**. Heritage map depicting the Hunter's Hill Conservation Area (C3), hatched in red, the heritage items as listed in the HHLEP, indicated in brown and 10 Cowell Street, outlined in green. The approximate location of the subject site is indicated by the red arrow. (Source: HHLEP Heritage Map 002A, http://www.huntershill.nsw.gov.au/Page/Page.aspx?Page\_Id=967, accessed 13 August 2105).

For the purposes of this report the impact of the proposed development (see Section 5) on 10 Cowell Street, the Bank Building (I488), Dunham House (I480), the Hunter's Hill Conservation Area (C3) and the Gladesville Shopping Centre Heritage Conservation Area (C5) will be assessed in Section 6.

#### 1.4 Purpose

This report is provided in support of a Planning Proposal, which seeks to vary the height and floor space ratio development controls of the HHLEP.

This report has been prepared, on behalf of the owner of the subject site, to enable Council to ascertain whether or not the proposal (as described in Section 5) will have a negative, neutral or

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positive impact upon the significance of these heritage items and the Heritage Conservation Areas. This assessment is carried out in Section 6 below.

#### 1.5 Methodology

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

#### 1.6 Limitations

- This SOHI is based upon an assessment of the heritage issues only and does not purport to have reviewed or in any way endorsed decisions or proposals of a planning or compliance nature. It is assumed that compliance with non-heritage aspects of Council's planning instruments, the BCA and any issues related to services, contamination, structural integrity, legal matters or any other non-heritage matter is assessed by others.
- This SOHI relies solely on secondary sources. Primary research has not been included in this report, other than the general assessment of the physical evidence on site.
- It is beyond the scope of this report to address Indigenous associations with the subject site. •
- It is beyond the scope of this report to locate or assess potential or known archaeological • sub-surface deposits on the subject site or elsewhere.
- It is beyond the scope of this report to assess items of movable heritage. •
- Rappoport Pty Ltd has only assessed aspects of the subject building/place that were visually • apparent and not blocked or closed or to which access was barred, obstructed or unsafe on the day of the arranged inspection.
- Rappoport Pty Ltd holds copyright for this report. Any reference to or copying of the report or information contained in it must be referenced and acknowledged, stating the report's name and date and Rappoport's authorship.

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#### 2.0 HISTORICAL CONTEXT

#### 2.1 General history

#### Prehistory

Prior to European settlement, the Gladesville area was known as Wallumetta by the traditional owners of the area, the Wallumatagal. The first recorded European contact with the area was 20 days after the arrival of the First Fleet, when Captain Arthur Phillip landed with an exploration team at Looking Glass Bay. The Bay, was subsequently named after Captain Phillip and his team came into contact with an Aboriginal man there, to whom they then gave a looking glass (mirror) to.<sup>1</sup>

#### **General Historical Development**

Initial European settlement in the Gladseville area, which was known as Eastern Farms, occurred in 1795. A number of Europeans, including John Doody, William House, Anne Benson and Charles Raven, received land grants in the area from 1795 onwards. John Doody's land grant was later purchased by John Glade in 1817, however, Glade was not issued with the deeds until 1836.<sup>2</sup>

Farming and dairy production dominated the Gladesville area with local farms supplying the Sydney market.<sup>3</sup>

While under the ownership of John Glade, John Doody's original land grant was increased in size with Glade expanding his property with numerous adjoining land holdings. After John Glade's death in 1848 the property was sold to William Billyard, a Sydney solicitor. Billyard named the property Gladesville before subdividing and selling it 1855.<sup>4</sup>

Prior to the construction of the Great North Road (now Victoria Road), the Gladesville area was largely isolated with Parramatta River the only access point. The Great North Road was surveyed in 1825 and its subsequent construction played an important role in the development of the Gladesville area. <sup>5</sup> Access to and from the Gladesville area was also improved by the construction of a wharf at the end of Wharf Road. Regular ferry services began operating and a post office was established at the wharf in 1861. The construction of the wharf coincided with the subdivision of the

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<sup>&</sup>lt;sup>1</sup> Margaret Farlow and Anglea Phippen, Gladesville, Dictionary of Sydney, 2008,

http://dictionaryofsydney.org/entry/gladesville, accessed 13 August 2015.

<sup>&</sup>lt;sup>2</sup> Margaret Farlow and Anglea Phippen, Gladesville.

<sup>&</sup>lt;sup>3</sup> Margaret Farlow and Anglea Phippen, Gladesville.

<sup>&</sup>lt;sup>4</sup> Margaret Farlow and Anglea Phippen, Gladesville.

<sup>&</sup>lt;sup>5</sup> Margaret Farlow and Anglea Phippen, Gladesville.

Gladesville estate, with the subdivided lots described as "gentleman villas with ample grounds for gardens, lawns and orchard" (see Figure 5).<sup>6</sup> Resulting increases in population in the Gladesville area lead to the first Gladesville Bridge being opened in 1881. Funds for the construction of the bridge had been raised from petitioning, by Gladesville residents, for improved access into the district.<sup>7</sup>



**Figure 5**. Subdivision map of the Gladesville area c. 1864. (Source: State Library of NSW, http://acms.sl.nsw.gov.au/album/albumView.aspx?itemID=889517&acmsid=0, accessed 13 August 2015.

The village of Gladesville developed from Bedlam Point settlement which was located at the junction of Wharf Road and Great North Road. The settlement gradually developed west becoming known as Gladesville in the 1870s. The post office was relocated from its original location at the wharf to the village in 1867 (see Figure 6).<sup>8</sup>

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<sup>&</sup>lt;sup>6</sup> Margaret Farlow and Anglea Phippen, Gladesville.

<sup>&</sup>lt;sup>7</sup> Margaret Farlow and Anglea Phippen, Gladesville.

<sup>&</sup>lt;sup>8</sup> Margaret Farlow and Anglea Phippen, Gladesville.



Figure 6. Gladesville Post Office c. 1907. (Source: National Library of Australia, http://trove.nla.gov.au/work/191373527?q=gladesville+hotel&c=picture&versionId=208853657, accessed 13 August 2015).

An early landowner in the Gladesville district was John Crotty. On his land Crotty constructed a stone cottage which was later named *Rockend* by Emily Mary Barton (see Figure 7). Emily Barton was the grandmother of Andrew Barton (Banjo) Paterson and was a published and prize-winning poet. Emily Barton lived at *Rockend* between 1866 and 1902.<sup>9</sup>



**Figure 7**. Rockend Cottage with members of the Barton family outside c. 1890. (Source: City of Ryde, http://library.ryde.nsw.gov.au/cgi-bin/spydus.exe/ENQ/PIC/BIBENQ?IRN=12367702&FMT=PA, accessed 13 August 2015).

In addition to the land which John Crotty built *Rockend* cottage on, he also acquired land along the Great North Road. This land was located near to the flagstaff which had been an important communication device during colonial times. Crotty built a weatherboard cottage on this land, which became the Gladesville Hotel in 1864 (see Figure 8).<sup>10</sup>

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<sup>&</sup>lt;sup>9</sup> City of Ryde Council, "Rockend Cottage," http://www.ryde.nsw.gov.au/Library/Local-History/Historic-Ryde/Historic-Buildings/Rockend-Cottage, accessed 13 August 2015.

<sup>&</sup>lt;sup>10</sup> Margaret Farlow and Anglea Phippen, Gladesville, Dictionary of Sydney, 2008,

http://dictionaryofsydney.org/entry/gladesville, accessed 13 August 2015.



**Figure 8**. Gladesville Hotel located on the Great North Road c 1873. (Source: National Library of Australia, http://trove.nla.gov.au/work/191373524?q=gladesville+hotel&c=picture&versionId=208853654, accessed 13 August 2015).

By the early twentieth century the Victoria and Pittwater Roads area in Gladesville was a major commercial and retail centre with a tram service being established in 1910 (see Figure 9 and 10). <sup>11</sup>



**Figure 9**. Looking north along Victoria Road c. 1939. (Source: National Library of Australia, http://trove.nla.gov.au/work/191374185?q=gladesville+hotel&c=picture&versionId=208854388, accessed 13 August 2015.



Figure 10. Tram outside Bayview Hotel on Victoria Road c. 1911. (Source: National Library of Australia, http://trove.nla.gov.au/work/191374986?q=gladesville+hotel&c=picture&versionId=208855322, accessed 13 August 2015).

<sup>11</sup> Paul Davies, "Hunter's Hill Heritage Review," Hunter's Hill Council, 2005, p. 5, http://huntershill.nsw.gov.au, accessed 13 August 2015.

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#### 2.2 Specific history of the site

The Gladesville Shopping Village is within the approximate area of a sixty acre land grant made to John Doody and Ann Benson in the 1790s. NSW Land Title records show that the land changed ownership many times with Hannah Miller taking ownership in 1870, after her husband's death. Hannah later changed her name to Cowell after marrying William Cowell and continued to own the land until her death in 1892, after which it was subdivided (see Figure 11). <sup>12</sup>

The timber cottage at 10 Cowell Street, occupying the corner block of Cowell and Flagstaff Streets, was built in 1916 while under the ownership of George Degan.<sup>13</sup> It remained in the Degan family for almost 60 years, before it was transferred to Hunter's Hill Council by Lilian Degan in March 1973.<sup>14</sup>



Figure 11. Subdivision map of Hannah Cowell Estate c. 1893. (Source: National Library of Australia, http://trove.nla.gov.au/work/7782600?q=Gladesville+Hotel&c=map&versionId=45084377, accessed 10 August 2015.

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<sup>&</sup>lt;sup>12</sup> Archrex Designs, Conservation Policy for 10 Cowell Street Gladesville, Hunter's Hill Council, 2000, p. 8,

http://www.huntershill.nsw.gov.au/Page/Download.aspx?c=3728, accessed 13 August 2015.

<sup>&</sup>lt;sup>13</sup> Archrex Designs, Conservation Policy for 10 Cowell Street Gladesville, p. 10.

<sup>&</sup>lt;sup>14</sup> Hunters Hill Municipal Council, Heritage Inventory Sheet (draft), 2002,

http://www.huntershill.nsw.gov.au/Page/Download.aspx?c=3725, accessed 13 August 2015.

Aerial photographs from 1943 of the subject site (Gladesville Shopping Village) demonstrate that the subject site was vacant at this time. It also shows the house at 10 Cowell Street before it was extended at the rear and before the small car port or shed to its east was demolished.



Figure 12. Aerial view showing the Gladesville Town Centre in 1943. (Source: Six Maps, http://maps.six.nsw.gov.au/, accessed 13 August 2015).

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#### 3.0 PHYSICAL EVIDENCE AND SETTING

The subject site is located on Flagstaff Street, Gladesville, approximately nine kilometres northwest of central Sydney. The subject site is located on the eastern side of Victoria Road. Victoria Road is a major road connecting central Sydney and Parramatta. Victoria Road is orientated north south along a ridgeline so is naturally a prominent aspect of the natural environment.

The eastern side of Victoria Road is located within the Hunter's Hill Conservation Area (C3). The conservation area adjacent to the subject site is comprised largely of two storey buildings used predominately for retail. They date from a range of architectural periods, with many retaining their original facades.

The western side of Victoria Road is located within the Gladesville Shopping Centre Heritage Conservation Area (C5). Similarly to the eastern side of Victoria Road the conservation area is comprised largely of two storey buildings used predominately for retail and dating from a range of architectural periods. An open public space (Trim Place) is also located along the western streetscape of Victoria Road.

#### Subject Site - Gladesville Shopping Village

The subject site takes up the eastern half of the block formed by Victoria Road, Massey Street, Flagstaff Street and Cowell Street. It occupies the corner of Cowell and Flagstaff Streets, with a small section to the west presenting to Massey Street. A lane leads from Cowell to Massey Street, dividing the subject site from the houses facing Victoria Road. The postal addresses of the properties situated within the proposed development are 1 Massey Street, 2-10 Cowell Street, and 1-7 Flagstaff Street.

The majority of the site is occupied by the Gladesville Shopping Village (1-7 Flagstaff Street), a multistorey retail building with basement car parking, flat roof and face brick walls. A lane from Flagstaff Street provides access to a loading dock in the northern corner. The lane separates the retail centre from the residential buildings at 5-11 Massey Street, which are not located within the area of the proposed development.

The eastern side of Flagstaff Street is mixed character streetscape. It provides examples of nineteenth century to early mid-twentieth century residential properties combined with contemporary residential flat buildings, with commercial premises located on the ground floor.

#### **10 Cowell Street**

The house located at 10 Cowell Street is set on the south east corner of the subject site. It is an early twentieth century timber cottage with a corrugated steel broken pitch roof and veranda that wraps

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around the house on two sides.<sup>15</sup> An extension has been added to the northern side of the original house at a later date. The house is fronted by a timber picket fence on both Cowell and Flagstaff Streets. Internally, the house has retained Art Nouveau influenced pressed metal ceilings and wall panelling.<sup>16</sup>

#### Bank Building - 219 Victoria Road (I488)

The Bank Building is an elongated two-storey structure situated on the eastern side of Victoria Road, within the Hunter's Hill Conservation Area (C3). It comprises an Art Deco styled front façade fronting Victoria Road, except that the ground level of the façade was modified and currently covered with polished stone cladding. The front section of the building is covered with a hipped corrugated metal roof. The rear section of the building, most probably belonging to a later addition, is a two-storey contemporary flat roof brick building. An open space at the rear serves as car parking area. The building is currently used as a branch of the Commonwealth Bank.

#### House "Dunham House" – 2 Massey Street (1480)

Dunham House is a two-storey sandstone villa situated on the northern side of Massey Street, within the Hunter's Hill Conservation Area (C3). The building has a terracotta tiled hipped roof and the Massey Street façade comprises of a bay window with balcony located above.<sup>17</sup>

The following photographs taken by Heritage21 provide a visual survey of the site and its setting.



**Figure 13**. View north along Victoria Road with the Hunter's Hill Conservation Area (C3) indicated by the red arrow. (Source: Heritage21, March 2013).

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<sup>&</sup>lt;sup>15</sup> Paul Davies, "Hunter's Hill Heritage Review," Hunter's Hill Council, 2005, p. 45, http://huntershill.nsw.gov.au, accessed 13 August 2015.

<sup>&</sup>lt;sup>16</sup> Paul Davies, "Hunter's Hill Heritage Review."

 <sup>&</sup>lt;sup>17</sup> Paul Davies, Inventory Sheets: "Appendix F: The Gladesville Shops Heritage Assessment and Conservation Guidelines",
 2005, http://gladesvillecommunity.com/onewebmedia/Gladesville\_Heritage\_Study\_F\_to\_G.pdf, accessed 13 August 2015.



**Figure 14**. View of the subject site from the south, across Cowell Street, encompassing the car park on the left, Gladesville Shopping Village and 10 Cowell Street on the right (Source: Heritage21, July 2012).



**Figure 15**. The Gladesville Shopping Village viewed from Flagstaff Street, facing north. (Source: Heritage21, July 2012).



**Figure 16**. View along Flagstaff Street towards the south, showing the slope of the area. The residential building at 11 Massey Street is not located within the subject site. (Source: Heritage21, July 2012).



**Figure 17**. View of the Gladesville Shopping Village from the south, towards the entrance of the basement car park. (Source: Heritage21, July 2012).



**Figure 18**. View of the lane connecting Massey and Cowell Streets, seen from the northwest looking towards the Gladesville Shopping Village. (Source: Heritage21, July 2012).

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**Figure 19**. View from the southern end of the lane towards the apartment buildings located on the opposite side of Cowell Street. (Source: Heritage21, July 2012).



**Figure 21**. View of Cowell Street from the east, showing the ascending slope of the area towards Victoria Road. (Source: Heritage21, July 2012).



Figure 20. View of the properties at 8 and 10 Cowell Street from the south, across Cowell Street. (Source: Heritage21, July 2012).



**Figure 22**. View of the building at 10 Cowell Street, which has been recommended for local heritage listing. The photograph shows the Cowell Street elevation. (Source: Heritage21, July 2012).



**Figure 23**. View of the front veranda of the cottage at 10 Cowell Street, looking east. (Source: Heritage21, July 2012).



**Figure 24**. View of the Flagstaff Street elevation of the cottage at 10 Cowell Street, showing the rear extensions including the garage. (Source: Heritage21, July 2012).

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**Figure 25**. View of the rear extensions to the original timber cottage at 10 Cowell Street, looking south. (Source: Heritage21, July 2012).



**Figure 27**. Internal view of the timber cottage at 10 Cowell Street and its intact pressed metal wall panelling. (Source: Heritage21, July 2012).



**Figure 26**. View of cottage at 10 Cowell Street from the neighbouring property at 8 Cowell Street. (Source: Heritage21, July 2012).



Figure 28. Internal view showing pressed metal ceilings. (Source: Heritage21, July 2012).



Figure 29. Internal view of a room with pressed metal ceilings and wall panelling. (Source: Heritage21, July 2012).



**Figure 30**. Front façade of the heritage item located at 219 Victoria Street, looking across Victoria Road. Note the Art Deco styled façade. (Source: Heritage21, March 2013).

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**Figure 31**. Rear façade and open space of the heritage item located at 219 Victoria Road. (Source: Heritage21, March 2013).



**Figure 32**. View, looking north, of the boundary between the subject site (left) and the heritage item located at 219 Victoria Road (right). (Source: Heritage21, March 2013).

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#### 4.0 ASSESSMENT OF SIGNIFICANCE

#### 4.1 Application of Significance Criteria

In order to make an assessment of whether or not the proposed development at the subject site, would have either a negative, neutral or positive impact upon the following heritage listed items:

- 10 Cowell Street Cottage;
- Bank Building 219 Victoria Road (I488);
- House "Dunham House" 2 Massey Street (1480)
- Hunter's Hill Conservation Area (C3); and
- Gladesville Shopping Centre Heritage Conservation Area (C5),

it is necessary first to ascertain the nature of the significance of these items.

The assessment focuses on the heritage items and conservation area contained within the Hunter's Hill Local Council, in the immediate vicinity of the subject site, however, it should be noted, that the assessment of the Hunter's Hill Heritage Conservation Area (C3) is equally valid for the Gladesville Shopping Centre Heritage Conservation Area (C5), which is located on the opposite side of Victoria Road and governed by the City of Ryde Council.

TABLE 1 : ASSESSMENT AGAINST SIGNIFICANCE CRITERIA		
Criterion	Assessment	
<b>A. Historical Significance</b> An item is important in the course, or pattern, of NSW's cultural or natural history (state significance); OR it is important in the course, or pattern of the local area's cultural or natural history (local significance).	The subject site, including 10 Cowell Street is situated on the original 60 acre land grand made to John Doody and Ann Benson in the 1790s. The timber cottage at 10 Cowell Street has historical significance as it provides evidence of the residential development of the site in the early twentieth century, when the cottage was built for George Degan in 1916.	
	The Bank building (I488) is one of the listed heritage items reflecting and contributing to the commercial development in Gladesville area. In our opinion, the heritage item possesses historical significance at a local level.	

The following assessment (Table 1) is based upon criteria specified by the NSW Heritage Office.<sup>18</sup>.

<sup>18</sup> NSW Heritage Office, Assessing Heritage Significance.

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Criterion	Assessment
	Dunham House (I480), located at 2 Massey Street, has historical significance because "the villa demonstrates a phase in the development of Gladesville which is associated with the popularity of the suburb in the mid and late nineteenth century as a place of residence for the city's professionals and merchants. <sup>19</sup> The Hunter's Hill Heritage Conservation Area (C3) have historical significance, as they provide evidence of the development of Gladesville from the establishment of Great North Road (now Victoria Road) from 1825 and subsequent concentration of the commercial and retail area in Gladesville along this important connection between Sydney Town and Parramatta.
<b>B.</b> Associational Significance An item has strong or special association with the life or works of a person, or group of persons, of importance in NSW's cultural or natural history (state significance); OR it has strong or special association with the life or works of a person, or group of persons, of importance in the cultural or natural history of the local area (local significance).	The cottage located at 10 Cowell Street and the Bank Building (I488) do not have any known associations with any people of prominence or importance. Accordingly, they do not, in our opinion, attain the requisite standard of significance under this criterion. The same applies to the Hunter's Hill Heritage Conservation Area (C3). Dunham House (I480), located at 2 Massey Street is associated with the Makinson family. The Makinson family lived in Gladesville for many generations and Henry Massey Makinson was a prominent figure in Sydney's legal profession. Dunham House, therefore, has associational significance. <sup>20</sup>
C. Aesthetic Significance An item is important in demonstrating aesthetic characteristics and/or high degree of creative or technical achievement in NSW (state significance); OR it is important in demonstrating aesthetic characteristics and/or high degree of creative or technical achievement in the local area (local significance).	The cottage at 10 Cowell Street has aesthetic significance as an example of a simple vernacular cottage of the Edwardian era which has retained its corrugated steel roof with broken pitch, wrap around veranda and its interior pressed metal ceilings and wall panelling. The Bank building (I488) contains some typical and exquisite decorative features of the Art Deco architectural style at the front façade, contributing to the diversified streetscape of Victoria Road. In our opinion, the subject item possesses aesthetic significance at a

<sup>19</sup> Paul Davies, Inventory Sheets: "Appendix F: The Gladesville Shops Heritage Assessment and Conservation Guidelines", 2005, http://gladesvillecommunity.com/onewebmedia/Gladesville\_Heritage\_Study\_F\_to\_G.pdf, accessed 13 August 2015. <sup>20</sup> Paul Davies, Inventory Sheets.

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Criterion Assessment		
enterion		
	local level.	
	Dunham House (I480), located at 2 Massey Street has aesthetic significance as it "demonstrates the architectural style and scale of late nineteenth century villa development". <sup>21</sup> The Hunter's Hill Conservation Area (C3) has aesthetic significance as a largely intact row of shops from different periods and styles, the	
	majority of which are two-storey buildings fronted by awnings.	
<b>D. Social Significance</b> An item has a strong or special association with a particular community or cultural group in NSW for social, cultural or spiritual reasons (state significance); OR has strong or special association with a particular community or cultural group in NSW for social, cultural or spiritual reasons (local significance).	The cottage located at 10 Cowell Street and the Bank Building (I488) do not have any special associations with any community or cultural group for social, cultural or spiritual reasons. Accordingly, they do not, in our opinion, attain the requisite standard of significance under this criterion. The same applies to the heritage item located at 2 Massey Street (I480) and the Hunter's Hill Heritage Conservation Area (C3).	
E. Technical/ Research Significance An item has potential to yield information that will contribute to an understanding of NSW's cultural or natural history (state significance); OR has potential to yield information that will contribute to an understanding of the area's cultural or natural history (local significance).	There is no evidence to suggest that the cottage located at 10 Cowell Street, the Bank Building (I488), Dunham House (I480) or the Hunter's Hill Heritage Conservation Area (C3) contain any technical significance beyond that contained in the common building practice of the day. They therefore do not meet this criterion.	
<b>F. Rarity</b> An item possesses uncommon, rare or endangered aspects of NSW's cultural or natural history (state significance); OR possesses uncommon, rare or endangered aspects of the area's cultural or natural history (local significance).	The cottage at 10 Cowell Street is considered rare locally as an example of a vernacular Edwardian building at the periphery of the Gladesville commercial and retail centre. Similarly, Dunham House (I480) is the only extant nineteenth century sandstone villa in the Gladesville Shops precinct. <sup>22</sup> Buildings built in the Art Deco architectural style are not currently rare in Sydney and there are numerous examples along Victoria	

<sup>21</sup> Paul Davies, Inventory Sheets.

<sup>22</sup> Paul Davies, Inventory Sheets.

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Criterion	Assessment
	Road. Accordingly, the Bank building (I488) does not, in our opinion, attain the requisite standard of significance under this criterion. The Hunter's Hill Heritage Conservation Area (C3) also does not attain the requirements for this criterion.
<b>G. Representativeness</b> An item is important in demonstrating the principal characteristics of a class of NSW's cultural or natural places or cultural or natural environments (state	The cottage at 10 Cowell Street is representative of vernacular timber cottages in the Edwardian era which has retained its interior pressed metal ceilings and wall cladding.
significance); OR is important in demonstrating the principal characteristics of a class of the area's	Dunham House "is representative of a class of residential dwellings popular in the latter half of the nineteenth century". <sup>23</sup>
cultural or natural places or cultural and natural environments (local significance).	The Bank building (I488) itself does not meet the requirements for this criterion. However, in our opinion, the Hunters Hill Conservation Area (C3), in which the heritage item is located, is representative of the development of commercial and retail centres along major road connections between the larger centres of Sydney.

## 4.2 Statement of Cultural Significance

The building at 10 Cowell Street has historical and aesthetic significance. It provides evidence of the residential development on the site of the original Doody and Benson grants in the early twentieth century when the simple timber cottage was built. It has retained its corrugated steel roof, wrap around veranda and internal pressed metal ceilings and wall cladding. It is considered rare locally and is representative of vernacular timber cottages in the Edwardian era.

The Bank building (I488) is one of the listed heritage items in the Hunters Hill Conservation Area (C3). The building contributes to demonstrating the development of Gladesville, from the establishment of the Great North Road (now Victoria Road), and subsequent concentration of the commercial and retail area in Gladesville along this important connection between Sydney Town and Parramatta. As one of the buildings fronting Victoria Road, the two-storey building contains some typical and exquisite decorative features of

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<sup>&</sup>lt;sup>23</sup> Paul Davies, Inventory Sheets.

the Art Deco architectural style at the front façade, contributing to the diversified streetscape of Victoria Road. In our opinion the subject item possesses historical and aesthetic significance at a local level.

Dunham House (I480), located at 2 Massey Street, "demonstrates a phase in the development of Gladesville which is associated with the popularity of the suburb in the mid and late nineteenth century as a place of residence for the city's professionals and merchants. The property is associated with the Makinson family who resided at Gladesville for generations. Henry Massey Makinson is noted for his association with the Sydney's legal profession. The property demonstrates the architectural style and scale of late nineteenth century villa development. The villa is the only extant example of its type in the Gladesville Shops precinct".<sup>24</sup>

The Hunter's Hill Conservation Area (C3) has historical and aesthetic significance. It contains an intact row of buildings from various periods, the majority of which are characterised by their two-storey appearance with largely original facades. It provides historical evidence of the development of Gladesville's retail and commercial centre along Victoria Road and is representative of the development of commercial and retail centres along important transport routes between the major centres of Sydney.

It should be noted, that the assessment of the Hunter's Hill Heritage Conservation Area (C3) is equally valid for the Gladesville Shopping Centre Heritage Conservation Area (C5), which is located on the opposite side of Victoria Road and governed by the City of Ryde Council.

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<sup>&</sup>lt;sup>24</sup> Paul Davies, Inventory Sheets.

#### 5.0 DESCRIPTION OF PROPOSED DEVELOPMENT

This report is provided in support of a Planning Proposal, which seeks to vary the requirements of the HHLEP as the proposed development will exceed the maximum building height and floor space ratio for the subject site.

Concept plans of the preferred scheme, which are contained in Section 5.1 Preferred Design Scheme (pp. 48-81) of the Urban Design Report for Gladesville Shopping Village prepared by Robertson + Marks (October 2015), have been used to inform this SOHI. The proposed development would include:

- the construction of a new mixed residential and commercial development consisting of four basement levels, one podium level and three towers;
- three towers located along the western side of the site (from north to south) with a lower and longer building located closer to the eastern podium edge;
- the re-use of the Right of Way located along the western edge of the site, connecting Massey and Cowell Streets;
- a building envelope with low buildings facing the perimeter streets and slender towers set well back towards the middle of the site;
- large setbacks from perimeter roads, including Victoria Road; •
- spatial separation between the three towers to provide view corridors;
- a podium level with landscaping and multiple pedestrian links to perimeter streets; •
- activation of the Flagstaff and Cowell streetscapes through use of shop fronts, multiple level • entry points and new tree lined pedestrian footpath along the western side of Flagstaff Street;
- landscaping of roof tops to provide communal open space, and
- the removal of 10 Cowell Street from its current location with multiple conservation options being considered.

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#### 6.0 ASSESSMENT OF HERITAGE IMPACT

As the proposal is to vary the building height and floor space ratio development standards of the HHLEP, we do not consider the proposal's compliance with that document.

The impact of the proposal is therefore considered from the following viewpoints: the Hunter's Hill Consolidated DCP 2013, the Draft Hunter's Hill Consolidated DCP 2015 and the guidelines set down by the Heritage Division of the NSW Office of Environment & Heritage which serves to raise the heritage-related issues normally applying to a development proposal.

This assessment is based upon: the Statement of Cultural Significance (refer to Section 4.2 of this SOHI); the physical inspection of the site and the graphic evidence (refer to Section 3 of this SOHI); and a review of the pertinent planning instruments and sources relating to heritage aspects of the proposal.

The Statement of Cultural Significance in section 4.2 of this report has determined that the building located at 10 Cowell Street (within the subject site) has historical and aesthetic significance. It is also considered representative of vernacular timber cottages in the Edwardian era and to be rare in the local area.

The Statement of Cultural Significance has also determined that the adjacent conservation areas (C5 and C3), and so to, the heritage items I488 (Bank building) and I480 (Dunham House), both located in the vicinity of the subject site, have significance at a local level.

Therefore the assessment of the proposed development will be considered in terms of the impact that it would generate upon the significance of the building located at 10 Cowell Street, the heritage items 1488 (Bank building) and I480 (Dunham House) and the conservation areas (C3 and C5) that are located adjacent to the subject site. To this end, the issues outlined below are addressed.

## 6.1 Development Control Plan: Part A

In the following sections we assess the proposal against the most pertinent sections of the *Hunter's Hill Development Control Plan 2013* (HHDCP).

## 2.4.2 AIMS & OBJECTIVES OF THIS CHAPTER

This chapter has the following aims and objectives:
(a) Conserve and enhance cultural heritage which contributes to character and environmental identity of the Hunters Hill Municipality by the appropriate use and development of land, existing buildings and structures.
(b) Protect the heritage significance of existing buildings and structures, tree covered

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streetscapes and scenically prominent landscape settings which are important elements of this Municipality's character, scenic quality and environmental identity. (c) Retain evidence of this Municipality's thematic development history by conserving significant elements of environmental heritage. (d) Complement heritage conservation provisions of the Hunters Hill LEP 2012 to ensure that future development does not detract from the significance of heritage items and heritage conservation areas which are important elements of this Municipality's character and environmental identity.

#### **Response:**

- The proposed development of the subject site (Gladesville Shopping Village) would perpetuate the historic role of Gladesville Town Centre as a commercial and retail centre. By providing modern retail space and residential units it would seek to ensure the long term economic viability of Gladesville.
- It is proposed that 10 Cowell Street will not be retained in its current location. This proposal is supported by Heritage21 because we are of the opinion that if the heritage item was to be retained in its current location the cottage would be overwhelmed and dwarfed by the bulk and scale of development which would occur immediately adjacent to the cottage.

As a local heritage item two options for conservation are available for consideration. These include:

- Option 1 relocation of the entire building to the podium of the new development; or
- Option 2 interpretation of the heritage values through the incorporation of significant heritage fabric, such as the pressed metal ceilings and walls, into a contemporary structure that would be included in the new development.

#### 2.4.3 GENERAL REQUIREMENTS IN RELATION TO HERITAGE

Applications for the redevelopment of a heritage item, or a property within a heritage conservation area, or a property that has no heritage status but that is located near a heritage item or a heritage conservation area, should address the following requirements: (a) Development proposals must evaluate likely effects in relation to identified values or significance of a heritage item and its setting, or the identified values and significance of a heritage conservation area:

*(i)* Evaluation of likely effects upon heritage significance should address principles of the ICOMOS (Australia) Burra Charter which have been adopted by this Plan.

(ii) In relation to proposed redevelopment of a heritage item, the Burra Charter requires proper research of the heritage item in terms of its form, components, growth and history, together with an assessment of significance in relation to heritage of the Hunters Hill Municipality.
(iii) In relation to a heritage conservation area, any proposed change to a

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building or its surroundings demands proper research of the heritage conservation area in terms of identity, history, character, topography and amenity.

(b) Documents should demonstrate that the proposed development would neither destroy nor detract from qualities which make the heritage item and its setting significant, or detract from qualities which make the heritage conservation area significant.

#### **Response:**

The observations made in this report are consistent with the principles outlined in the ICOMOS Burra Charter. The assessment of heritage impact is based on the identification and understanding of all the heritage values and how these values would be impacted by the proposed development.

#### 2.4.4 DETAILED REQUIREMENTS FOR HERITAGE ITEMS

*Proposals for redevelopment of a heritage item also should address the following requirements:* 

(a) Primary aims are to maintain and enhance qualities that have been documented by a heritage conservation management plan.

(b) Any proposed changes to the existing building should respect the form, scale and materials of the original building, or should be of a very minor extent.
(c) Proposals which involve substantial extensions are more likely to be acceptable if they would not compromise the integrity or character of the original building:
(i) Desirably, extensions should be separated from the original building.
(ii) In general, alterations or additions should respect the original building in terms of form and shape, scale, architectural details, materials and finishes.
(iii) New works should incorporate an architectural style and details that would complement the original building, and should neither imitate nor visually compete with architectural character of the original building.
(iv) Design of alterations or additions should incorporate a simple and unobtrusive architectural style which would neither detract from nor visually dominate the character of the original building.
Note. It is likely that Hunter's Hill Council will not support development proposals

which involve substantial or total demolition of a heritage item.

#### **Response:**

Firstly, it must be noted that a conservation management plan has not been produced. Thus, Heritage 21 has relied upon its own assessment of potential impacts. In relation to the shops along Victoria Road, including 219 Victoria Road (former Commonwealth Bank building), the proposed development would not generate negative impacts for the following reasons:

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- Development is predominately occurring on the western edge of the subject site with a separation between the site and the adjacent conservation area (C3) and even further away, C5;
- The existing building height controls on Victoria Road will create a transition from the conservation area (C3) to the development site stepping up from 2 storey shopfronts to multi-storey development that would sit behind the shops as an articulated screen. Visually, the two (shops along Victoria Street and the proposed development) would be separate and be appreciated differently. The reasons for this are contained in the RLA report dated 26<sup>th</sup> August 2015;
- Spatial separation between the three towers allows for site permeability and visual corridors which connect the heritage conservation areas with the new development;
- The proposed re-use of the right of way, located along the western boundary of the subject site, would allow buildings in the heritage conservation area to be appreciated in the round and not just from the front façade.

In relation to 10 Cowell Street, the development would generate a negative impact due to the close proximity of the development site to it, the difference in heights and materiality. It is therefore recommended to remove 10 Cowell Street from its present location and either reinterpret its pressed metal materials or relocate it on to the podium level of the new development.

- Both conservation options (relocation and interpretation) would retain significant fabric of the building; and
- interpretation would allow the heritage values to be appreciated by visitors and users of the future site.

In relation to the heritage item located at 2 Massey Street, the impact of the proposed new development would be mitigated by the separation of some 55 metres between the heritage item and the multi-storey tower components.

## 2.4.6 ASSESSMENT PROCEDURES FOR HERITAGE CONSERVATION

The Hunters Hill LEP 2012 specifies that heritage management documents may need to be provided by certain development applications:

(a) Where the proposed development would demolish, alter or affect a heritage item or a property that is located within a heritage conservation area.

(b) For redevelopment of a property that has no formal heritage status, but that is located near a heritage item or a heritage conservation area.

Heritage management documents should be prepared by a qualified heritage architect or heritage planner, and should provide the following information which addresses principles of theICOMOS (Australia) Burra Charter:

(a) Proposed redevelopment of a heritage item requires a heritage conservation management plan which documents the following:

(i) Significance of the heritage item; and

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(ii) Conservation policies and management techniques which are necessary to maintain significance of that item.

(b) Proposed redevelopment within a heritage conservation area or in proximity to a heritage item or a heritage conservation area requires a heritage impact statement which documents the following:

(i) Significance of the item or area that would be affected; and (ii) Evaluates the likely impact of the proposed development in relation to significance of the item or area that would be affected; and

(iii) Techniques which would minimise impacts.

(c) All development proposals that would affect a heritage item or a heritage conservation area (including any property that is located near a heritage item or a heritage conservation area) must provide detailed responses to matters for consideration and principles which are specified by the Hunters Hill LEP 2012 and this Plan.

Development applications which are submitted to Hunter's Hill Council, and which involve proposals for development that are likely to affect heritage values, will be reviewed by the Council's Conservation Advisory Panel (CAP):

(a) The CAP primarily provides recommendations to the Council in relation to likely heritage impact of development proposals, but also provides heritage conservation advice to landowners, applicants and architects.

(b) The CAP meets monthly, and its recommendations are considered by the Council prior to the determination of development applications which are likely to affect heritage values.

Before lodging an application for development which would be likely to affect the value of a heritage item or a heritage conservation area that are listed by the Hunters Hill LEP 2012, applicants are encouraged to consult Council's Planning Officers:

(a) As the basis for effective discussion with the Council's heritage adviser or the CAP, preliminary sketches should be guided by a heritage conservation management plan or a heritage impact statement, and should incorporate sufficient detail to address heritage values that have been identified.

(b) Preliminary sketch plans should not provide final details and, at the very least, should include a locality plan which describes adjoining properties and buildings (in particular, any heritage items) together with a site plan, plus elevations and sections which describe the intent of proposed building works.

#### **Response:**

At this early stage the fate of 10 Cowell Street within the future proposal is still to be determined following Council's preliminary feedback, however, it would appear that in either scenario a Schedule of Conservation Works would be required and it would be appropriate to include such with DA documentation.

#### 6.2 **Development Control Plan: Part B**

In the following section we assess the proposal against the most pertinent sections of the Draft Hunter's Hill Consolidated DCP 2015. We address these in Table 2 below.

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TABLE 2 : ASSESSMENT AGAINST Draft Hunter's Hill Consolidated DCP 2015		
Question	Assessment	
2.1 Desired Character b) Engaging – For the community, 'engaging captures the desire for an exciting, interactive and pleasant street level experience that incorporates warm, natural materials such as timber, brick and sandstone; user-friendly paths; respect for heritage; heritage interpretation; and artistic elements.	<ul> <li>In relation to the heritage items (2 Massey Street and 219</li> <li>Victoria Road), the proposed development would not generate negative impacts to the surrounding heritage conservation areas and heritage items for the following reasons: <ul> <li>The design of the building through the spatial separation of the towers attempts to mitigate the potential negative impact of its increased scale and bulk compared to the structures currently located on the subject site;</li> <li>The removal of 10 Cowell Street and consideration of interpretation or relocation would prevent the heritage item from being overwhelmed and dwarfed by new development. Both option 1 and 2 would ensure that significant fabric would be retained and also allow greater appreciation of the item's heritage values then would be allowed if the item retained in situ.</li> </ul> </li> </ul>	
2.2 Development Priorities 4) Respond respectfully to the scale, bulk and height transitions across streets, between precincts, land zones, Heritage Conservation Areas and Items.	Measures have been introduced into the design to respect the scale of the heritage items except at 10 Cowell Street which would be somewhat overwhelmed in scale due its proximity to the podium and tower components of the development. 10 Cowell Street will need to be moved and either interpreted (pressed metal ceilings and internal walls) or relocated. The method employed by the architects to manage the height and scale is to break up the tower component into parts with visual access between and to introduce a podium level as a scale transition between the two storey shops (219 Victoria Road) and the two storey house (2 Massey Street) as well as the Heritage Conservation Area C3 and C5, and that of the proposed development.	

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3.1.1 Commercial Core Precinct d) Delivers buildings that, above the street level, complement the rhythm of the existing built fabric of the centre	The proposed development will be visible above the street level of Victoria Road and therefore will create visual change. However, as Richard Lamb and Associates details in the visual impact assessment, the setback of the proposed development will ensure that the Heritage Conservation Area and new development remain visually separate and thus will not detract from the existing rhythm and existing built fabric along Victoria Road. We share this view.
3.1.2 Key Site b) Address the impact of the scale, bulk and intensity of future development on adjacent public domain and buildings by transitions to the scale and materiality of the heritage main street and surrounding residential neighbourhoods.	As discussed in our responses to DCP clauses 2.2 and 3.1.1 above.
4.0 Built Form c) Ensure that the proportions, form and scale of new buildings respond to and positively re-interpret the built form of the tradition main street and/or heritage assets of the area.	Ibid.

## 6.3 Heritage Division questions

We are also required to address specific issues raised in the Heritage Division guidelines for the preparation of Statements of Heritage Impact. We address these in Table 3 below.

TABLE 3 : ASSESSMENT AGAINST HERITAGE DIVISION QUESTIONS		
Question	Assessment	
New development adjacent to a heritage item (including additional buildings and dual occupancies)		
How is the impact of the new development on the heritage significance of the item or area to be minimised?	Through the introduction of a podium level as a transition between the multi-storey components and the existing single and two storey fabric of the conservation areas, including the heritage items located at 2 Massey and 219 Victoria Road. However, the design is unable to resolve the scale transition between 10 Cowell Street and the new podium and tower	

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Question	Assessment
Why is the new development required to be adjacent to a heritage item?	<ul> <li>components especially due to the proximity of the new buildings to 10 Cowell Street. Accordingly, it is encouraged to remove 10 Cowell Street and either relocate it or interpret its pressed metal materials.</li> <li>The subject site is identified as a Key Site within Chapter 4.4 of the Hunters Hill Consolidated DCP Draft 2013 and, through its</li> </ul>
	development it is expected to become the commercial and community heart of the Gladesville Village Centre.
How does the curtilage allowed around the heritage item contribute to the retention of its heritage significance?	The curtilage around 219 Victoria Rd is at the front of the building i.e. the manner in which people view and enjoy the Art Deco façade of the bank building from Victoria Road will remain unaffected by the new design. Similarly, the curtilage belonging to 2 Massey Street would be retained as the building is generally viewed and enjoyed from the vantage of Massey Street. In the case of 10 Cowell Street, its curtilage and setting would be negatively affected by the design hence the suggestion to relocate or interpret as discussed above.
How does the new development affect views to, and from, the heritage item? What has been done to minimise negative effects?	Discussed above – see responses to: (How is the impact of the new development on the heritage significance of the item or area to be minimised?).
Is the development sited on any known, or potentially significant archaeological deposits? If so, have alternative sites been considered? Why were they rejected?	The proposed development is, not to our knowledge, sited on any known or potentially significance archaeological deposits. However, it is beyond the scope of this SOHI to discuss the probability of sub-surface deposits.
Is the new development sympathetic to the heritage item? In what way (e.g. form, siting, proportions, design)?	The proposed development would be sympathetic to the Heritage Conservation Areas (C3 and C5) for the following reasons:
	• The spatial separation between the three towers reduces their bulk and allows for visual corridors to be created between the Conservation Area and the new proposed development.
	The proposed development would not be sympathetic to the heritage item located at 10 Cowell Street and therefore, its removal or interpretation is encouraged. Both options would ensure that significant fabric would be retained and also allow greater appreciation of the item's heritage values than would



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TABLE 3 : ASSESSMENT AGAINST HERITAGE DIVISION QUESTIONS		
Question	Assessment	
	be allowed if the item were to be retained in situ.	
Will the additions visually dominate the heritage item? How has this been minimised?	In the case of 10 Cowell Street, yes. This is discussed and amplified above.	
Will the public and users of the item, still be able to view and appreciate its significance?	The impact of the proposal on the ability for the public and users to view and appreciate the heritage conservation area will be minimal. The spatial separation between the three towers allows for site corridors between the Heritage Conservation Areas (C3 and C5) and the new development. This allows visual permeability into the site and cohesion between the subject site and the Heritage Conservation Areas (C3 and C5). Any increased bulk and scale of the new development would have is mitigated by the proposed design. The impact of the proposal on 10 Cowell Street and so to the ability for the public and users to view and appreciate its heritage values will be negative and it is our opinion that 10 Cowell Street could either be relocated or could be interpreted as discussed above.	

#### 6.4 Summary

The NSW Heritage Office's 'Statement of Heritage Impact' guidelines require the following aspects of the proposal to be addressed (see Table 4).

TABLE 4 : ASSESSMENT OF GENERAL IMPACT	
Aspect	Assessment
Aspects of the proposal which respect or enhance the heritage significance of the item or conservation areas.	<ul> <li>The proposed development would respect the heritage significance of the Heritage Conservation Areas (C3 and C5) in the following ways:</li> <li>The design of the building through the introduction of a podium as a scale transitioning device and the spatial separation of the towers are attempts to mitigate the potential negative impact of the developments increased scale and bulk compared to the structures currently located on the subject site.</li> <li>10 Cowell Street would not in our opinion be respected</li> </ul>

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TABLE 4 : ASSESSMENT OF GENERAL IMPACT	
Aspect	Assessment
	and enhanced, hence our suggestion for interpretation or
	relocation as discussed above.
Aspects of the proposal which could have detrimental impact on heritage significance.	There will be a negative impact on 10 Cowell Street – see our suggestions above.
Sympathetic alternative solutions which have been considered and discounted.	Heritage21 was not involved in the design process.

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#### 7.0 CONCLUSION & RECOMMENDATIONS

#### 7.1 Conclusion

In accordance with the observations made in Section 6 of this report, Heritage21 is of the opinion that the proposed re-development of Gladesville Shopping Centre would have a neutral impact on the heritage items located at 2 Massey Street and 219 Victoria Road and also the Heritage Conservation Areas (C3 and C5). The design of the new development, through the introduction of a podium as a scale transitioning device and the spatial separation of the towers, attempts to mitigate the potential negative impact of its increased scale and bulk compared to the structures currently located on the subject site. As a result, the proposed development would not, in our opinion, detract from the identified cultural significance of the heritage items and heritage conservation areas.

The heritage item located at 10 Cowell Street would not, in our opinion, be respected and enhanced by the proposed development. Therefore, we suggest the following:

- 10 Cowell Street be either relocated; or
- the heritage values of 10 Cowell Street should be conserved through interpretation and the incorporation of significant heritage fabric (ie. pressed metal ceilings and walls) into a contemporary structure that would be incorporated into the new development.

Both options (relocation and interpretation) would retain significant fabric of the building and would continue to allow the heritage values to be appreciated by visitors and users of the future site. Either of these options would be supported by Heritage21 as a positive outcome for the conservation of the heritage values of 10 Cowell Street, based on the observations made in this report.

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