

**ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000**

URBIS.COM.AU
Urbis Pty Ltd
ABN 50 105 256 228

29 October 2021

Department of Planning
4 Parramatta Square
12 Darcy Street
Parramatta NSW 2150

To whom it may concern,

HERITAGE IMPACT STATEMENT – 70 GLENDOWER STREET GILEAD

BACKGROUND AND PROPOSAL

Urbis has been engaged by HT Building to prepare the following Heritage Impact Statement (HIS) to accompany an application to the DPIE for a Site Compatibility Certificate (SCC) in conjunction with the development and masterplan for future seniors housing located at 70 Glendower Road, Gilead (subject site).

The subject site is not identified as heritage item, nor is it located within a Heritage Conservation Area. However, the adjacent lot to the north is identified as having State heritage significance, being 'Sugarloaf Farm' (SHR #101389) and included in *Schedule 5 Environmental Heritage* within the *Campbelltown Local Environmental Plan 2015*. that will form part of the APZ for bushfire protection

There is extensive vegetation within and surrounding the subject site. Therefore, bushfire requirements have been identified for the purpose of the Site Compatibility Certificate. It is anticipated that approximately a 25metre strip of the adjacent SHR listed lot to the north be utilised as part of an Asset Protection Zone (APZ) for bushfire protection that will require ongoing vegetation management, as well as the construction of a 2.5metre metal fence defining the boundary of the APZ.

There are no detailed plans at this stage which identify the exact quantity or species of trees which are required to be removed to facilitate the APZ, however preliminary assessment identifies the site to contain predominantly the weed species African Olive and approximately eight trees that are typical to the Cumberland Plain Woodlands. The APZ is seeking to retain 15% of the existing tree canopy. There are also no detailed plans at this stage of the required fencing. Therefore, this Heritage Impact Statement provides a preliminary assessment of the potential physical and visual impact of the proposal on the State listed heritage item. A detailed Heritage Impact Statement is to be prepared to accompany the Development Application.

SITE LOCATION AND CONTEXT

The subject site is located at 70 Glendower Street, Gilead and is legally described as Lot 21 DP 1000643, and has an area of approximately 5.139ha and is located within the Campbelltown Local Government Area (LGA). The Seniors Housing development is proposed on the eastern portion of Lot 21. A portion of the adjoining site of the State heritage listed Sugarloaf Farm (Lot 3 DP 10007066) to the north is required as part of the bushfire Asset Protection Zone (shown in blue below).



Figure 1 – Proposed development and bushfire APZ shaded pale green. The partial area of the State listed 'Sugarloaf Farm' that forms part of the proposed bushfire APZ is shaded in blue.

Source: Travers Bushfire and Ecology, 2021 with Urbis overlay.

HERITAGE SIGNIFICANCE

The subject site is not identified as heritage item, nor is it located within a Heritage Conservation Area. However, the adjacent lot to the north that will form part of the APZ for bushfire protection is identified as having State heritage significance, being 'Sugarloaf Farm' (SHR #101389) and included in *Schedule 5 Environmental Heritage* within the *Campbelltown Local Environmental Plan 2015*.

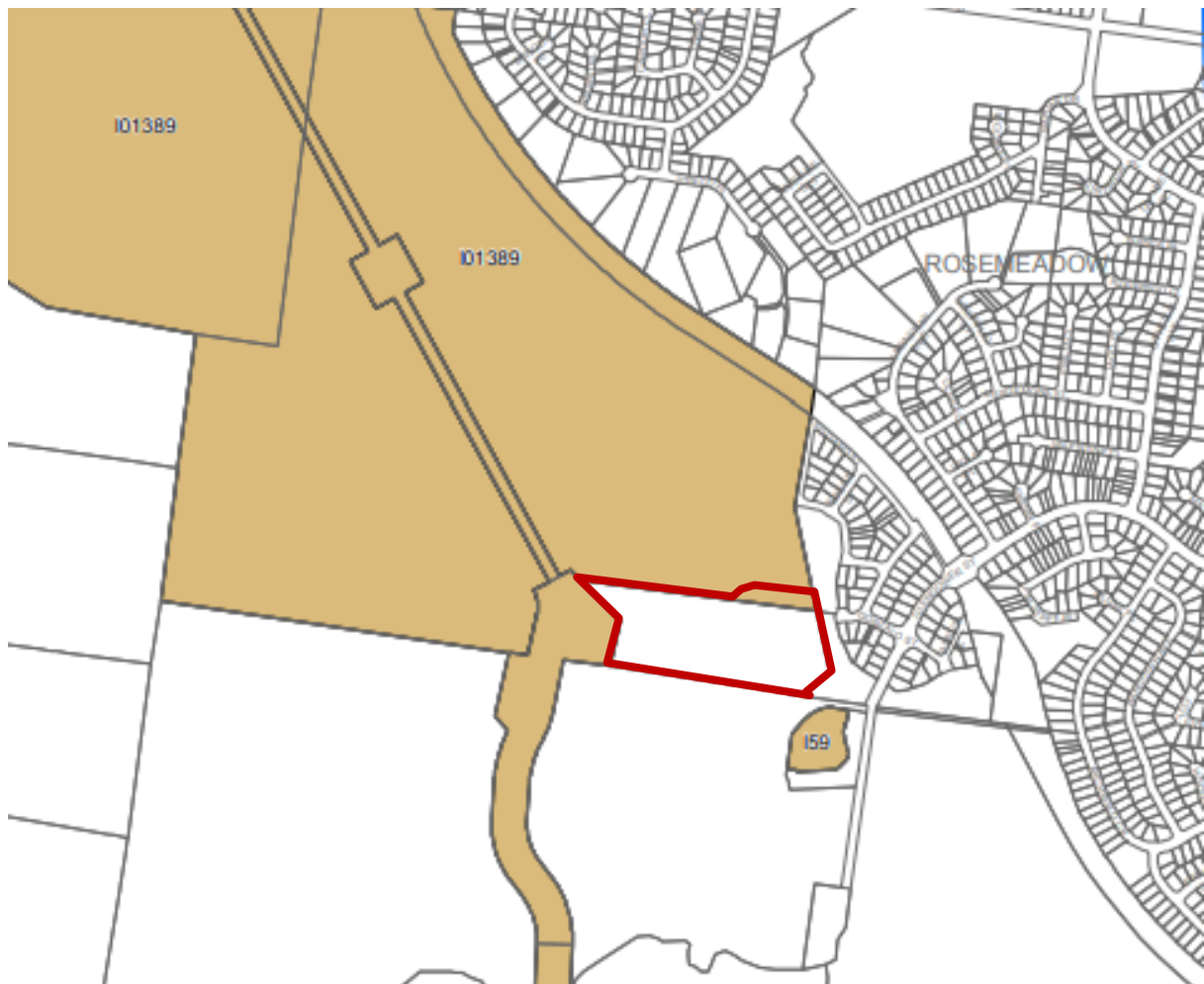


Figure 2 – Extract of heritage map with proposed subject site outlined in red.

Source: Campbelltown LEP 2015, Heritage Map_Sheet HER_003..

STATEMENT OF SIGNIFICANCE – ‘SUGARLOAF FARM’ (SHR NO. IO1389)

The following statement of significance is extracted from the NSW Heritage Inventory for Sugarloaf Farm.¹

Sugarloaf Farm is a largely intact farm complex dating from the 1840s through to the 1940s and demonstrating a range of uses throughout its life. The main homestead represents the first phase of use of the site for cereal cropping and the associated outbuildings represent various changes of use to dairying (1890s), horse and cattle

¹ NSW Heritage Inventory, ‘Sugarloaf Farm’ (SHR NO. IO1389), <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=5045759>

studding (1940s) and riding school (1980s). The site has retained much of its original setting allowing a high degree of interpretation of the historic landscape.

Sugarloaf Farm is of State Significance for its association with the early settlement and development of Menangle as a farming district. The farm has high historical, visual, aesthetic and research value as a remnant of an earlier cultural landscape. The surviving rural landscape setting has cultural significance due to its ability to demonstrate important aspects of the early European occupation such as early plantings, paddocks, fences, early grant areas and some archaeological features and sites.

The farm is of state significance as it exhibits characteristics typical to Cumberland Plain colonial landscapes and setting, which are becoming increasingly rare in the Sydney region due to the pressure of modern urban development. The farm buildings themselves are amongst a declining number of rural groups surviving in the area, now part of the urban development edge of Campbelltown.

The farmstead complex has high visual and aesthetic value, located in a prominent position and retaining elements of their original setting and a relationship to Menangle Road and the rural setting to the west and south.

The farmhouse is of State significance as a good example of Colonial farmhouse in the Georgian style retaining much of its original form and fabric. The 1880's-1900 additions to the buildings allow interpretation and the changing needs of its occupants.

The late nineteenth century farm buildings, particularly the remnant dairy, allow interpretation of a prosperous rural holding and demonstrate the changing farming practices and land usage of the district over a period of 160 years.

(Conservation Management Plan - Graham Brooks and Associates)

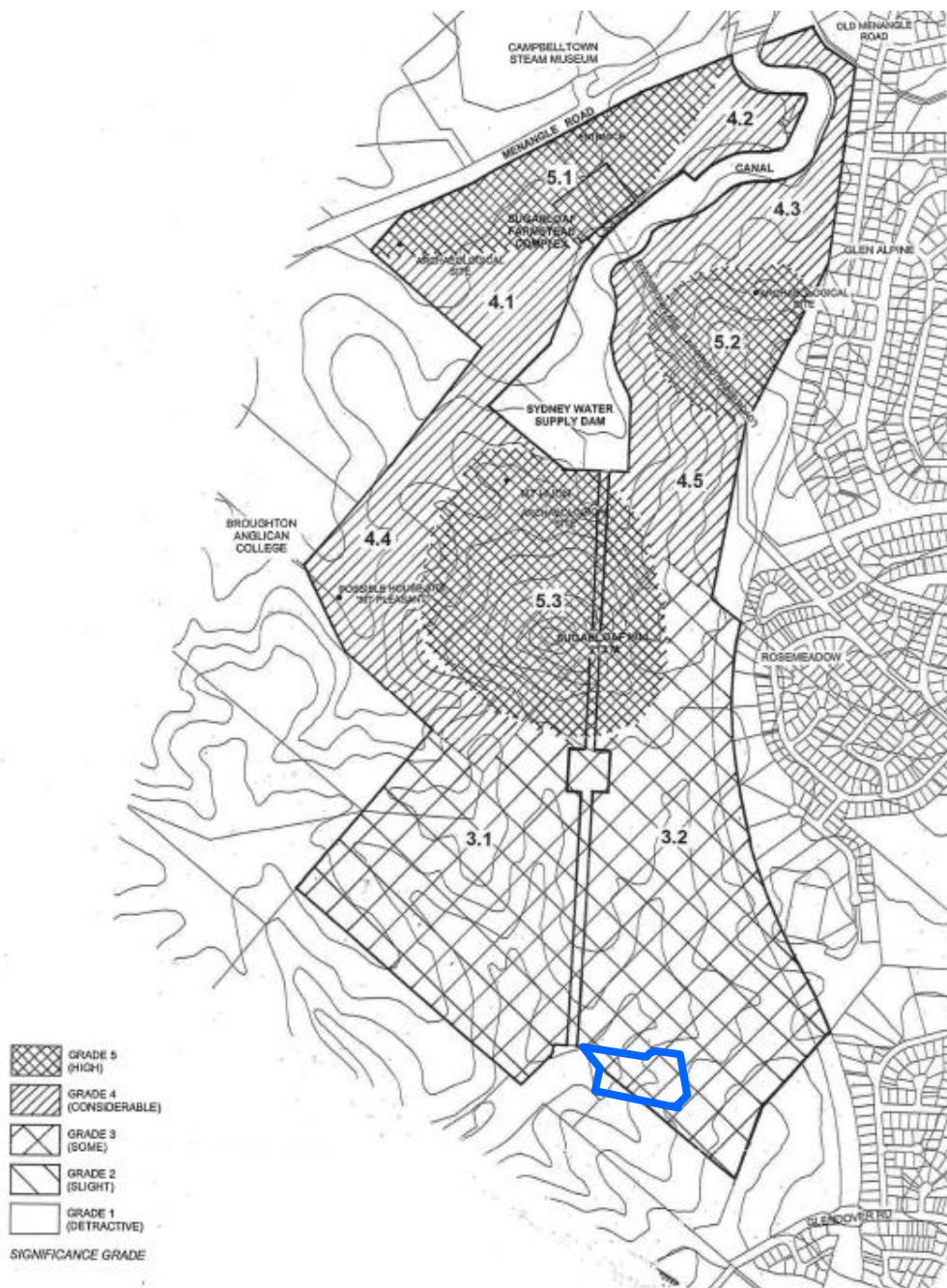


Figure 3 – Extract from CMP showing Grading of Significance of Sugarloaf Farmstead Complex and approximate location of subject site outlined in blue.

Source: Sugarloaf Farm CMP, Graham Brooks, 2001, P. 161.

The CMP identifies the part of the adjacent Sugarloaf Farm that being considered as part of the bushfire APZ as Grade 3 (with some significance) The CMP response to this grading of 'some' significance is as follows:

*Elements assessed as of **some significance** are of significance to the understanding of the place but not of the highest degree. Any work on items in this category should be carried out for category except that work involving the reduction of significance may be acceptable where it is necessary for the adequate and safe functioning of the place or site.²*

VEGETATION AND LANDSCAPE SETTING

The following description of the vegetation pertaining to the Sugarloaf Farm setting is extracted from the Sugarloaf Farm CMP prepared by Graham Brooks in 2001:

The natural indigenous vegetation community characteristic of the Sugarloaf Farm area is represented by Grey Box/ Ironbark Woodland which forms part of the Cumberland Plain Woodland. The clearing of this vegetation during the early years of European settlement of the area, has resulted in the creation of a predominantly open landscape character. The cultivation of crops and pasture grasses required the removal of indigenous trees and shrubs from most areas. However the retention of some trees, I possibly the more inaccessible and unproductive areas, has provided the nucleus of the now regenerating woodland community on parts of the farm.

The agricultural activities of the last 200 years have also encouraged the proliferation of many exotic plant species which, due mostly to their prolific growth, are classified as weeds. The weeds present on the farm include African Olive, African Boxthorn, Blackberry, Sweet Briar, St Johns Wort, Noogoora Burr, Bridal Creeper and Prickly Pear with Small and Large Leafed Privet in gullies.

The vegetation located within the boundary of Sugarloaf Farm that forms part of the bushfire APZ has been identified as predominantly containing the weed species, African Olive and a thin canopy of trees and vegetation identified as being particular to Cumberland Plain Woodland species.

HERITAGE CURTILAGE – ‘SUGARLOAF FARM’ (SHR NO. I01389)

The following description outlining the curtilage of Sugarloaf Farm is extracted from the Sugarloaf Farm Conservation Management Plan (CMP) prepared by Graham Brooks in 2001.

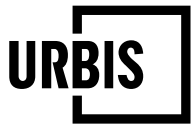
When a heritage item is being considered for listing or management purposes, a decision usually needs to be made about the extent of land around it which should be defined as encompassing its heritage significance. This area of land is known as a "heritage curtilage".³

The heritage curtilage contains all elements contributing to the heritage significance, conservation and interoperation of a heritage item. The curtilage is defined by a line on a map, which will not necessarily coincide with the property boundary.⁴

² Brooks, G. *Sugarloaf Farm CMP*, P.79.

³ Heritage Office, Department of Urban Affairs and Planning, *Heritage Curtilages*, P.1.

⁴ Ibid, P.5.



In this case, the heritage curtilage for the farmstead complex is greater than the property boundary. The factors that helped define the heritage curtilage of the farmstead complex are:

- *visual, physical, historical and functional links with important features in the site*
- *historic land subdivision patterns*
- *potential archaeological sites*
- *setting, views and landmark qualities*

The proposed bushfire APZ is located outside both the historical and visual curtilage of Sugarloaf Farm and Farmstead complex as illustrated in the following diagrams that have been extracted from the Sugarloaf CMP (2001).

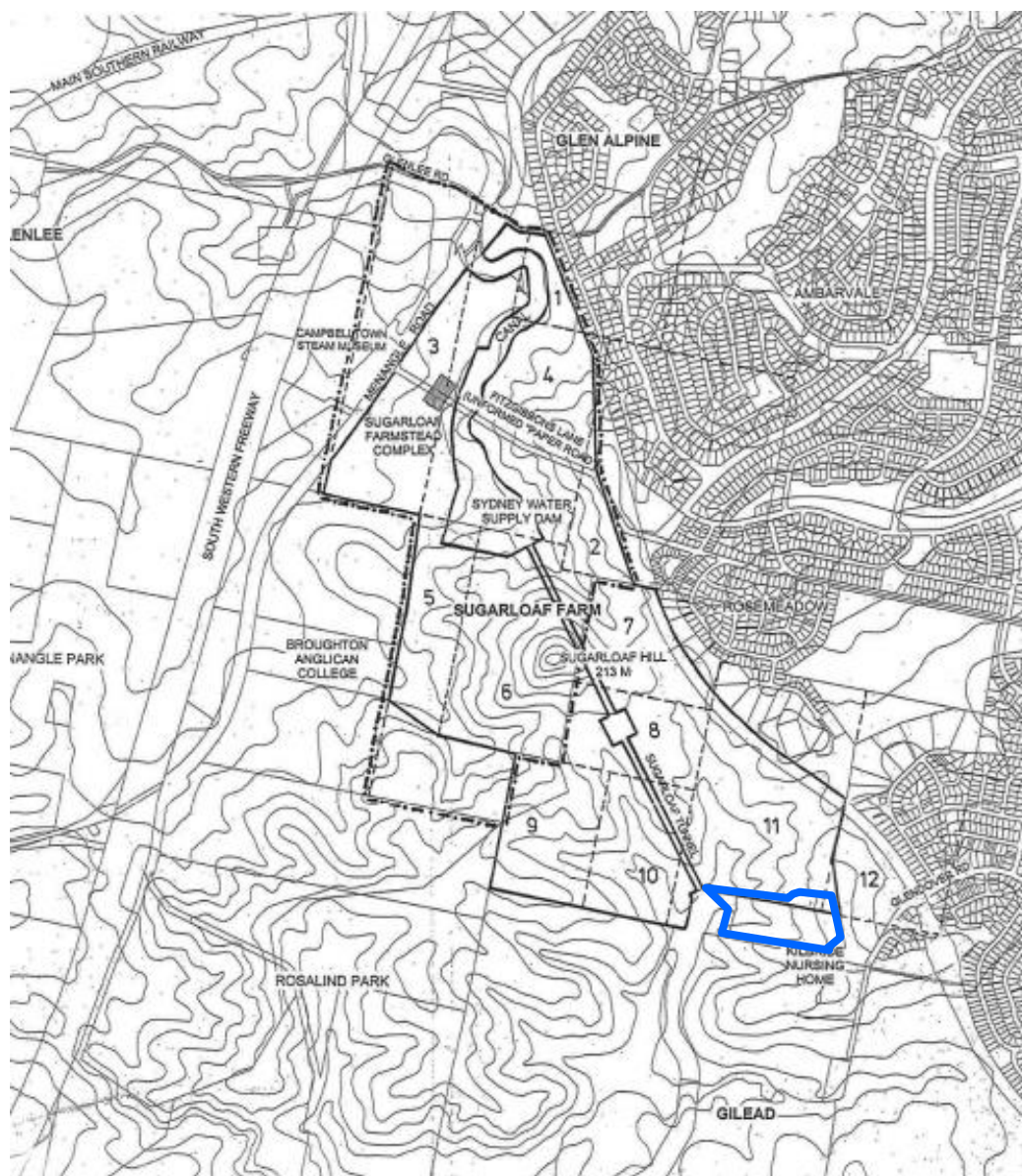


Figure 4 – Extract from CMP showing Historical Curtilage of Sugarloaf Farmstead Complex (dashed line) and approximate location of subject site outlined in blue.

Source: Sugarloaf Farm CMP, Graham Brooks, 2001, P. 158.



Figure 5 – Extract from CMP showing Visual Curtilage of Sugarloaf Farmstead Complex (dashed line) and approximate location of subject site outlined in blue.

Source: Sugarloaf Farm CMP, Graham Brooks, 2001, P. 159.

PRELIMINARY HERITAGE IMPACT ASSESSMENT

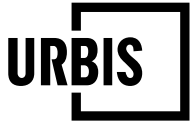
The proposed extension of the bushfire Asset Protection Zone (APZ) within the boundary of the State heritage listed Sugarloaf Farm is supported in principle for the following reasons:

- The proposed bushfire APZ is both physically and visually separate from the Sugarloaf Farmstead complex (as identified in the Sugarloaf CMP 2001) and makes minimal contribution to the overall cultural heritage significance of the site and its association with the early settlement and development of the area as a farming district.
- Since the 1970s the Sugarloaf Farm and property has been used as a Horse Riding School, with the property currently used for grazing, recreational horse riding and stabling. The 2011 CMP for Sugarloaf Farm prepared by Graham Brooks and Associates observed that the property was considerably degraded due to the activities associated with the riding school and grazing of horses on the property. Further assessment is required to substantiate whether the damage from horses extends to the southern boundary of the property.
- The proposed area for bushfire APZ is identified as being Grade 3 – ‘some significance’ and is recognised to contribute to the understanding of the place, however is not considered to be of the highest degree. The CMP provides provision for necessary change within Grade 3 areas for adequate and safe functioning to take place.
- The vegetation within the proposed bushfire APZ is identified as being predominantly the weed species African Olive with a small percentage of Cumberland Plain Woodland species. The proposed clearing and management of vegetation within the bushfire APZ is supported in principle. However design development should demonstrate that priority is given to retaining vegetation particular to the Cumberland Plain species to maintain the landscape character of the SHR item.
- The proposed boundary 2.5 metre fence located partially within the site identified as part of the Sugarloaf Farm is supported in principle, provided it is sensitively resolved during future design development so as to have minimal impact on the heritage significance and landscape setting of the area.
- Whilst a preliminary view is that the southern boundary of the Sugarloaf Farm is not significant as it would have been substantially altered for the subject site. Further design development should allow for continued legibility of that part of the site as part of the SHR item. We recommend further investigation be completed of the southern boundary as part of any future DA.
- The proposal maintains the Sugarloaf farmstead complex along with its significant historical and visual curtilage including all associated structures, site features, landscaping and other heritage resources.

CONCLUSION AND RECOMMENDATIONS

A preliminary heritage impact assessment of the proposal has been undertaken above. Overall, the proposed bushfire APZ and required fencing is supported in principle, subject to:

- Future detailed design in consultation with a Heritage Consultant
- View analysis demonstrating that the works would not have detrimental impacts on significant views from within the SHR curtilage.
- Specific landscape analysis identifying Cumberland Plain Woodland Species.



- Archaeological Assessment (if determined to be required by a suitably qualified archaeologist).
- Assessment of future applications in a detailed Heritage Impact Statement. Applications will be subject to approval under the *Heritage Act 1977*.

Further design detail and investigations of quantities of existing vegetation to be retained within the bushfire APZ is recommended, with the view of retaining as much existing vegetation as possible (preference is to be given to clearing weed species as opposed to Cumberland Plain Woodland Species) in order to maintain the landscape character and setting. Further design detail of the proposed 2.5 metre fence should be considered and sensitively resolved to mitigate any potential impact on the visual setting and heritage character of the site.

The proposal is supported in principle from a heritage perspective.

Kind regards,

A handwritten signature in black ink, appearing to read "Rebecca Zulaikha". The signature is fluid and cursive, with a long horizontal stroke at the end.

Rebecca Zulaikha
Consultant
+61 2 8233 7611
rzulaikha@urbis.com.au