



# STATEMENT OF HERITAGE IMPACT

## PROPOSED SUBDIVISION 3 GRAHAM AVENUE, PYMBLE 2073

AUGUST 2016

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## STATEMENT OF HERITAGE IMPACT FOR SUBDIVISION AT 3 GRAHAM AVENUE, PYMBLE

## 1.0 INTRODUCTION

This Statement of Heritage Impact has been prepared in accordance with the standard guidelines of the NSW Heritage Division to accompany an application to subdivide the property into two low-density residential allotments with access to Graham Avenue.

Currently located on the subject site are the remains a tennis court and several large trees. The site has an access handle reaching Taunton Street, but there is not vehicular access along this link. Council granted consent to DA 538/13 to construct a large detached dwelling over the site of No. 23 Telegraph Road.

The site is adjacent to an item listed on the State Heritage Register, 'Coppins' located within the Park Estate Heritage Conservation Area identified in the Ku-ring-gai Local Centres LEP 2012. The major part of the land is not associated with the Coppins at the time of its construction.

The assessment of potential heritage impact has been undertaken by Brad Vale, under the direction of Robert Staas, Associate Director / Heritage Consultant of NBRS+PARTNERS Architects. Details of the development proposal have been prepared by Paul Meyer Design Pty Ltd.

## 1.1 Methodology

This Statement of Heritage Impact adopts the format of the NSW Heritage Council publication *Statements of Heritage Impact*. It is prepared responding to the requirements for development affecting a contributory item in a conservation area listed in the *Ku-ring-gai Local Centres Local Environmental Plan 2012*.

## 1.2 Heritage Listings

The bulk of the subject land is not a heritage item, but the driveway handle to Graham Avenue passes across the subdivided southern extremity of the heritage item 'The Coppins' (aka the Eric Pratten House), which is a local heritage item and is listed on the State Heritage Register.

The site is of course otherwise adjacent to two heritage items at 21 and 29 Telegraph Road, and is within the wider vicinity of other heritage items, such as those at 15 and 17 Telegraph Road.

The site is within heritage Conservation Area C7 listed on the *Ku-ring-gai Local Centres LEP 2012.* 



## Heritage



Item - General

Figure 1 — extract from Map 7C of the Ku-ring-gai Local Centres LEP 2012, showing the subject site outlined heavily in blue, and a lighter line showing the alternate non-vehicular access to Taunton Street. The site is adjacent to several heritage items and within Conservation Area C7.

## 1.3 Heritage Significance

## C7 Heritage Conservation Area – Park Estate Pymble

The Ku-ring-gai Local Centres DCP contains specific sections dealing with each Heritage Conservation Area. The Section dealing with C7 Park Estate Pymble, gives the significance of the area as follows:

*Historical Significance:* The Park Estate HCA is of historical significance as a late nineteenth century subdivision which retains largely intact development from the Federation and Inter-war periods.

**Aesthetic Significance:** The Park Estate HCA is considered to be of high aesthetic significance for its fine collection of substantial Federation and Interwar housing, including fine examples of the Federation Queen Anne, Federation Arts & Crafts, Inter-war Old English, Inter-war California Bungalow, Inter-war Functionalist and Inter-war Georgian Revival styles. The topography also adds to the area's aesthetic significance, as the land rises from Robert Pymble Park to the north, resulting in the area's houses

overlooking the park. Houses on the even side of Taunton Street overlook the houses in Park Crescent below.

Based on this assessment of significance, the subject site does not demonstrate the original subdivision patterns from the Federation or Inter War period and contains no development that contributes to the area's identified aesthetic significance. The site was originally excluded from the first listing of the conservation area in the Town Centres LEP which was overturned by the NSW Land & Environment Court, but was subsequently included in the *Kuring-gai Local Environmental Plan (Local Centres) 2012.* 

Given the site's secluded character within the Conservation Area, well outside the public domain, the potential for adverse impact on any significance ascribed to the Conservation Area is very limited.

## 2.0 DOCUMENTARY EVIDENCE

Historical information about the subject site and surrounding properties is presented here, starting with a neighbour, moving to Coppins, and ending at the subject site that was incorporated into the Coppins after the house was built, and later subdivided from it.

### No. 21 Telegraph Road

This site is significant for the gatehouse/stable close to the northern boundary with Telegraph Road. The State Heritage Inventory lists its significance as, *Reasons for listing; historic, architectural, rarity value, municipal* 

significance Note; gatehouse/ stable only

The State Heritage Inventory also mentions that the site was purchased by Dr Walter William Joseph O'Reilly (1847-1919) in 1882, along a road marked on the early maps as 'Military Road'. At his suggestion the road was renamed Telegraph Road. O'Reilly brought his family to Pymble in 1896 to the house on this site that he had built and where he practised as a doctor. His daughter joined him in his Pymble practice and continued after his death. She was the first woman doctor to qualify for a residential post at Sydney Hospital.

The site is identified as item No. 183 in the Ku-ring-gai Town Centres LEP 2012. The site is occupied by a substantial Federation era house with a shingled stable block on the road frontage. The boundary adjustment between the subject sites and potential future development would not have any significant adverse impact on this item due to its relative location and separation by virtue of substantial tree screening.

### No. 29 Telegraph Road – 'Coppins' (the Eric Pratten House)

No. 29 Telegraph Road is listed as a heritage item in the Ku-ring-gai Town Centres LEP and is entered on the State Heritage Register.

In addition to these statutory listings, the building and its garden curtilage is classified by the National Trust and is identified by the Walter Burley Griffin Association and the Art Deco Society. The house is also entered on the Register of Twentieth-Century Buildings of Significance prepared by the AIA (NSW Chapter).

The listing of the house prepared by the Walter Burley Griffin Society for nomination to the State Heritage Register includes the following statement of significance and description:

The Eric Pratten house is important as Griffin's largest domestic commission in Australia. It was one of his last works before leaving Australia for India and completed by his associate, Nicholls. It is one of three large Griffin houses in Ku-ring-gai. The Eric Pratten house is important as a large intact Griffin designed residence, which includes the house within its garden setting. It is rare, as the majority of his residential commissions in Australia are relatively small houses, typically one storey. The house demonstrates a high level of technical competence and excellence, particularly related to stone construction in Australia during the 1930s.

The house is set within a large corner site of 0.572 Ha/9647 m<sup>2</sup> on two titles. The Telegraph Road section of the site is fairly level, but Graham Avenue falls about 5 m from Telegraph Road. The house is sited near the western boundary on the highest part of the site. It is approached via a long gravel drive. The drive terminates at the stone and tile garage, which has similar detail to the main house. There is a secondary pedestrian entrance from Telegraph Road along a path behind the house to the kitchen and garage. The south-eastern part of the site drops off and a large pool is located there. It is not visually obvious from the house or the entrance. To the west of the pool and behind the garage is a private courtyard area defined by stone walls and largely screened from view due to the fall of the site.

The site contains many large mature trees, believed to be part of Griffin's original planting layout. The site is located behind a high stone wall, which is covered by a vine. The house is almost totally obscured from view due to the number of large mature trees on the site and also on the footpath along Telegraph Road.

The design elements of the house demonstrate some of Steiner's ideas about spirituality and the concepts of anthroposophy. The house is formed from carefully articulated sandstone masses with battered walls, angular prows and deep reveals set beneath a series of sailing roofs in a re-interpretation of the Wrightian Prairie house. The ground floor window reveals, cut into the stone batters, have lintels dressed in a low triangular motif. The effect is somewhat Tudor Gothic, but is also reminiscent of the trapezoidal windows, which characterize Steiner's work. The Eric Pratten house is designed at the high point of Griffin's Steiner phase incorporating some of Steiner's motifs.

#### Modifications

1934-5: first land parcel bought, house designed and built. Garden elements likely to have been constructed were: sunken courtyard; driveway including wrought iron entry gates; garden beds and plantings along Telegraph Rd. boundary and driveway; squared off area of lawn adjacent to driveway and front rooms, later to hold the flag pole; garage; stone wall and steps beside garage; windmill; tank stand; 1939: second land parcel with rear access to Taunton St. & Pymble Station purchased. by 1943: driveway, garage, tank stand, windmill, sunken courtyard and front gardens all established; squared off area of lawn adjacent to front rooms bound by hedge established; beginnings of productive garden south of garage: level area of lawn southeast of house (used to corral the daughter's horse); by 1947: terraces along eastern boundary adjacent to Graham Ave. established; productive garden and utility area south of garage well established; informal path from garage to rear entry to site at Taunton St. established; by 1951: gardener's lodge and tennis court established; retaining wall of swimming pool terrace in construction - central apse to wall built (1951 aerial photo); service driveway established from rear of garage; skirting productive garden and tennis court to Taunton Ave. entrance; by 1956: features and layout of garden (as visible in present day (2002) are well established; swimming pool terrace and axial path to house, changing pavilion constructed; by 1961: glasshouse built behind garage (Tropman & Tropman, 2002, 9). 1960s-2000: some of the bathrooms and the kitchen were up-dated. The gardens were also amended somewhat 2002: unapproved works undertaken: - a new (non) boundary fence built (potentially a new boundary fence); - new plants planted and established (altering current boundary structures); - new watering system installed; and - five bathrooms gutted, including the possible removal of original tiling fabric from two of the five bathrooms.

#### Site History

Robert Pymble, a settler and orchardist, was granted 600 acres by the Crown in the parish (as later defined) of Gordon in 1823. Unlike many grantees of his time, Pymble became a permanent resident and pioneer of the region. He retained most of his estate for most of his life. It was not until 1882, when the district was beginning to expand to accommodate upper class dwellers from the city, that large-scale alienation of the Pymble properties took place. The projected building of the North Shore railway (begun in 1887 and opened from St. Leonards to Hornsby in 1890) was a powerful incentive for development.

In 1883, Pymble sold 2 large blocks, totalling 100 acres, on Lane Cove Road and on the junction of a government road (later Telegraph Road). The subject block of 3 acres, on Telegraph Rd., was sold to a medical doctor, Walter O'Reilly, in 1883. Dr O'Reilly and his wife and family heirs retained the land, building on a portion of it, until they began to dispose of it in the 1920s.

In 1922 O'Reilly's widow and sons sold the Graham Avenue portion to James Kebblewhite, merchant. Kebblewhite's widow and son sold it to Eric Herbert Pratten in 1934. The adjacent portion (in respect of its south section) was acquired by Pratten in 1939.

Eric Pratten's father, Frederick was a printer, engineer and politician who had settled in Telegraph Road (Cable in Tropman & Tropman, 2002, 3). Herbert Pratten and his half brother Frederick had migrated from England to Australia and started Pratten Brothers Printing. They were a successful firm, and were also involved in mining and manufacturing. Herbert Pratten became a leading national politician. He built a large house for his family in Telegraph Road.

After Frederick's two sons, Eric and David had married in the early 1930s, their father gave them land in Telegraph Road and funds to build a house to their own design. It is believed that the two brothers were inspired after seeing the Cameron House in Marion Street Killara, designed by Walter Burley Griffin (completed in 1933). Both Eric and David Pratten commissioned Griffin to design their houses.

In 1935, before the second (and final) set of plans for Eric's house were completed, Griffin left Australia for India where, after an extraordinary burst of creativity, he died in 1937. Eric's house, known as Coppins, was finished and construction supervised by Griffin's partner and former assistant, Eric Nicholls. Although a disciple of Griffin and a sharer of his Anthroposophical beliefs, Nicholls was obliged to modify some of Griffin's symbolism for the client. It seems to be accepted opinion that the result is similar to work that Griffin had done in Frank Lloyd Wright's studio in Chicago, reminiscent of the Prairie School (of architecture).

The David Pratten house at the corner of Telegraph Road and Mona Vale Road, opposite his uncle Herbert's family house, was the third Griffin design for the site. Nicholls also supervised the construction of this house after Griffin's departure for India.

Authorities are divided on the place of these last houses designed by Griffin in Australia. To Peter Harrison (1995), they 'did not afford Griffin much satisfaction...far removed from the domestic retreats in which he delighted.' A more sympathetic estimate is in the Powerhouse Museum volume: 'although designed at the highpoint of Griffin's Steiner phase and incorporating some Steiner motifs, [the Eric Pratten House] is in fact a reprise of the central design problem of the Griffins' Chicago years: how to create a radical house for a conservative client.'

#### Landscape:

The gardens of the estate include several formal and informal garden elements that result from a landscape concept for the estate. There is a deliberate and considered relationship between these elements and the design of the main house. The layout of the large garden elements are arranged in response to the house's planning and fenestration. These elements, e.g.: the swimming pool terrace, the rose garden and the sunken courtyard, are aligned along significant axes with the house.

The development and construction of the estate was progressive, with the final large elements, i.e.: the swimming pool, being constructed approximately 15 years after completion of the house.

Following an interview with the original owners, it has since been learnt that the initial garden was done in collaboration with a designer named Campbell from New Zealand. It appears that the garden design and spatial arrangement was worked out with the construction of the house.

The later larger elements were designed by John Suttor of Suttor & Cox. It is very possible that Suttor used design details from Griffin's work on the house, stone wall and entry gate to tie in these later garden elements to the house and the original garden features.

The design of the house is evidence that the initial siting of the house and the planned outlook of the rooms, were designed by Griffin to take command of the site, as well as to focus on the house as the principal feature of the landscape. The house was deliberately located with its back to the west, on a knoll at the corner where the two original lots met. This was the only position allowing the house and the rooms within to interact with all areas of the site, while taking advantage of the views. The location of the house was also likely to have considered the future uses of the various areas of the garden, and catered to the formal/public and private needs of the various users.



*Figure 2* — View of the northern end of the Eric Pratten House facing Telegraph Road showing the original formal gardens in the mid Twentieth Century.



Figure 3 — View of the house and garage in the mid Twentieth Century, from a location near the southern boundary showing the original lawn area before the construction of the formal terrace, pool and pool house.



Figure 4 — View of the house from the entry on the corner of Telegraph Road showing the curvilinear driveway and the formal garden on the right.



Figure 5 — 1943 Aerial view of the subject site outlined in red, showing wartime production of vegetables occupying a small area, while the remainder was either unused or possibly grazing land. The Eric Pratten House is to the top-right. [Spatial Information Exchange Maps]

The place conveys the stylistic cohesiveness notable in Griffin's work, and is particularly significant as the house stands within large formal grounds with a sunken garden, tennis court and pool - even the dog kennel was designed by Griffin. Many mature trees, most considered to be part of the original planting layout, have survived. Griffin scholars believe that the complexity of the garden layout suggests that Marion Mahony, Griffin's wife, may have been responsible for its design.

The house was sold after Eric Pratten died in the mid-1960s and was purchased by the Denning family who occupied it until 2000. During that time little fundamental change was made to the house although some of the bathrooms and the kitchen were up-dated. The gardens were also amended somewhat without changing the main features of the house and its relationship to the garden).

## 2.1 Curtilage

The official heritage curtilage of the Eric Pratten House – 'Coppins' was determined by the NSW Heritage Council in 1999–2000 when the site was subdivided for sale. See Figure 6. The curtilage did not take into consideration the approved access right of way along the south east boundary of the site or the walkway access to Telegraph Road along the south western boundary with the adjoining site at 21 Telegraph Road.



Figure 6 — State Heritage Curtilage Plan – 01443 Plan 2119

The essential setting of the house includes the original lot on which it was built, purchased by Eric Pratten in 1934 and excluded the lot to the west which was part of a later expansion of the site made in 1943. The gardener's lodge and tennis Court were erected by 1951 and are not part of any heritage listing. These structures were largely demolished in early 2016. The pedestrian right-of-way on the western boundary was excluded from the curtilage.

A small reduction of the curtilage was approved in 2002–2003 and 2013 to allow for the construction of new entry gates on Graham Avenue and a new driveway along the southern boundary.

## 2.2 The Subject Site

Having purchased the Coppins site for the Eric Pratten House in 1934, and had the house built by the following year, Pratten purchased the land of the subject site in 1939 for additional recreational facilities. The right-of-way to Taunton Street may have been an arrangement that saved time for some members of the household in walking to Pymble Railway Station.

By 1943, the site had been largely cleared, leaving a stand of remnant blue gum high forest along the western boundary. A driveway path is evident near the south-eastern boundary on similar locations to the existing concrete path. A large vegetable garden is apparent in the 1943 aerial photograph, straddling the current north-eastern boundary. This garden was probably set up for wartime production, but continued in use into the 1950s. The remaining land may have been used as grazing land, since a daughter of Eric Pratten kept a horse at home for a time. The exotic trees on the site would have been planted after this time, long after Eric Nicholls and the Griffins had finished their work on this site. The ground is moist and fertile so trees can grow quickly here.

The subject site was being developed for the pleasure and recreation of the family by the 1950s. The gardener's cottage and tennis court were constructed by 1951. They were designed by John Suttor of Suttor & Cox. It appears that Suttor designed them to be compatible with Griffin's work on the house. The stone of the tennis court matches the coursing and texture of the sandstone on the house and boundary fencing. A glasshouse was built behind garage by 1961. While the gardens around the main house at No. 29 Telegraph Road are sophisticated and remarkable, incorporating the design of Campbell from New Zealand (and debatably a landscape concept by Marion Mahoney), the landscape on the subject site does not contain sophisticated planting or evident landscape design.

The Coppins site was sold after Eric Pratten died in the mid-1960s and was purchased by the Denning family who occupied it until 2000. During that time little fundamental change was made to the site and its structures. The subject site was subdivided from Coppins in 2012. The structures on the subject site were demolished in 2016.



Figure 10 - 2011 aerial view of the subject site showing the tennis court in the lower central part of the image, and the house Coppins with the green roof, the adjoining heritage item at 21 Telegraph Road.

## 3.0 PHYSICAL DESCRIPTION

The subject site is a battle-axe shaped residential block of land containing several structures that were built to serve a later stage of No. 29 Telegraph Road (the Eric Pratten House). These structures include a small cottage built for the gardener close to the southern corner, a tennis court constructed with cut and fill retaining walls clad with sandstone, other retaining walls, small sheds and a concrete driveway curving in proximity to the south-eastern driveway.

The natural ground line falls across 90m from a high point in the northern corner to the southern corner that is approximately 12m lower. Groves of remnant and regrown Blue Gum High forest trees grow along the western and part of the south-eastern boundaries. The under-storey is far from intact. Two exotic deciduous trees grow on the east side of the tennis court.

The gardener's cottage was constructed in the post-war era c1951 in the lower part of the former larger estate, set lower down than the tennis court, where the occupants would be least likely to compromise the privacy of the family in the main house. The house is a single storey, constructed of rendered brickwork with a broad hip roof with a relatively low pitch and casement windows that make some simple references to the design style of the Eric Pratten house, though it was designed much later by John Sutton. The tennis court was constructed on this site by 1951 with rock-faced sandstone retaining walls that match the textures at the Eric Pratten house.



Figure 7 — view looking north from the site's southern corner looking towards the post-war cottage that was demolished in 2016. NBRS+PARTNERS, July 2014



Figure 8 — north-eastern façade of the cottage, seen from the tennis court. It was damaged by falling timbers in early 2014. NBRS+PARTNERS



Figure 9 — view along south-western boundary showing the brick driveway built in recent decades, and showing Sydney blue gum trees. NBRS+PARTNERS, 2014



Figure 10 — view along the south-eastern boundary. The bananas will be cleared to enable the approved right-of-way to Graham Avenue. NBRS+PARTNERS, 2014



Figure 11 — north-western view up past the side of the tennis court looking towards the hoop pine, and on to the rear of No. 21 Telegraph Road. The tennis court was largely demolished in 2016. NBRS+PARTNERS, July 2014.



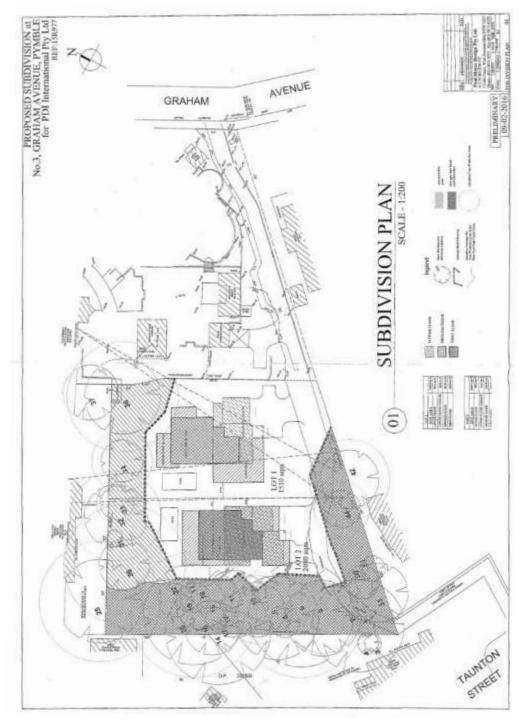
Figure 12 — easterly view from the tennis court (now partly demolished), showing the liquidambar tree on the left and the pin oak tree on the right. NBRS+PARTNERS, July 2014.



Figure 13 — southwards view from near the northern boundary across the land that falls towards the southern corner. NBRS+PARTNERS, 2014

## 4.0 THE PROPOSAL

The proposal in this application involves a subdivision of the existing single allotment into two low-density residential allotments for detached houses. The western allotment would have an area of 2080m<sup>2</sup> and the eastern allotment would have an area of 1510<sup>2</sup>. Access to both houses is via the approved driveway to Graham Avenue. The houses shown below are indicative only for the purpose of this subdivision, to show that appropriate houses could be designed for future applications when construction is proposed.



*Figure 14* — the proposed subdivision pattern forming this application is shown in this subdivision plan by Paul Meyer Design.

## 5.0 PREVIOUS APPROVALS

In April 1999, Ku-ring-gai Council granted consent to a Development Application No. 48/99 for a boundary adjustment between Lot 1 and Lot B in DP 303397 and DP304623 affecting the curtilage of Coppins at 29 Telegraph Road, in accordance with plans prepared by B.K.Bennett & O'Donnell surveyors. This approval was granted prior to the place being entered on the State Heritage Register.

In 2003 an approval under Section 60 of the *NSW Heritage Act* was granted by the Heritage Council for the creation of a driveway along the southern boundary of the State Heritage item Coppins, and located within the defined heritage curtilage of the item. The proposed driveway and associated drainage and retaining walls were prepared by AFCE Environment & Building. The new driveway was to have been constructed within the right of carriage way over No. 29 Telegraph Road in favour of No. 23 Telegraph Road at the rear of the State Heritage site. The finish on the concrete driveway was a stencilled stone pattern. The required retaining walls were to be constructed of stone.

A further approval under Section 60 of the Act was granted for the construction of new stone gate piers and steel gates on the Graham Avenue frontage matching the original estate gates on the corner of Telegraph Road designed by Griffin and Nicholls. This work has now been constructed.

In 2003 an exemption was granted by the Heritage Council for paving repair works in association with the area between the house and the garage that was formerly brick paved, and was proposed to be restored to sandstone paving.

In 2003 Ku-ring-gai Council sought to include No.23 Telegraph Road (largely the subject site) as a heritage item in the Ku-ring-gai Planning Scheme Ordinance. The proposal did not receive support at a Council meeting and the site has no statutory heritage listing.

In 2010 Ku-ring-gai Council prepared detailed planning controls for the area in the Ku-ring-gai Town Centres LEP. No. 23 Telegraph Road was not included in that document as a heritage item and was not included within the surrounding C7 heritage conservation area. In 2011 The Ku-ring-gai Town Centres LEP 2010 was overturned by the NSW Land & Environment Court.

In 2012 The Ku-ring-gai Local Centres LEP 2012 was adopted including the heritage listing of 29 Telegraph Road and the identification of C7 Heritage Conservation Area encompassing the subject site.

Council granted consent to DA 538/13 for a large single dwelling on the allotment at No. 23 Telegraph Road.

## 6.0 HERITAGE IMPACT ASSESSMENT

## 6.1 Introduction

The following assessment is based on the guidelines set out by the NSW Heritage Office publication 'Statements of Heritage Impact', 2002.

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

- The large trees on the site can be retained. The subdivision plan shows the area of retained blue gum high forest to the western and southern sectors of the site. An additional area to the north of the site is a dedicated tree protection zone for a grove of trees that are mostly exotic o Ku-ring-gai. The canopy of these trees is visible from the public domain and contributes to the character of the conservation area;
- There is potential for one house to be constructed on each of the two allotments that is unlikely to be visible from the public domain in the conservation area. (note that the footprints of houses on the subdivision plan are indicative for subdivision purposes; permission is not being sought for construction in this application);
- Consideration has been given to locating the subdivision line so that a house can be located on each allotment that allows the long views filtered through the blue gums from the houses at 21 and 29 Telegraph Road to continue.

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:

• Subdivision of the land at the rear of a heritage item will have no adverse heritage impact on the adjoining heritage listed sites.

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

The location of the proposed subdivision of No.3 Graham Avenue has no impact on the heritage curtilage or the significance of the adjoining heritage items; alternatives for this work are not required because the resulting lots are in compliance with Council controls.

## 6.2 Subdivision

The proposal includes the subdivision of an existing allotment separated from nearby heritage items. The areas do not affect the heritage significance of either the State heritage item or the adjoining Local heritage item at 21 Telegraph Road. There is no impact on the adjoining conservation area as a result of this application.

• How is the proposed curtilage allowed around the heritage item appropriate?

The curtilage of the heritage item has been determined by the NSW Heritage Council and is defined by the gazetted diagram. The creation of an access handle at the south of No 29 Telegraph Road did not alienate land with cultural value from the property.

• Could future development that results from this subdivision compromise the significance of the heritage item? How has this been minimised?

Future development of the two allotments would be for a detached house on each allotment. Houses could be constructed here that are not visible, or scarcely visible from the public domain.

• Could future development that results from this subdivision affect views to and from, the heritage item? How are negative impacts to be minimised?

The houses would be designed with due consideration for the retention of significant views from the heritage items.

## 6.3 New landscape works and features

• How has the impact of the new work on the heritage significance of the existing landscape been minimised?

The subdivision plan shows that the blue gum high forest and a grove of other significant trees on the north of the site can be protected with a house being built on each allotment. The remaining grass and sites of the demolished tennis court and gardener's cottage do not have significant landscape or research value.

• Has evidence (archival and physical) of previous landscape work been investigated? Are previous works being reinstated?

The proposed work is not part of any reinstatement of earlier works. The 1943 aerial photograph shows an access track across the proposed right-ofway and boundary planting in the vicinity. The remnant blue gum high forest is the only other feature remaining on the site that can be traced to the 1943 aerial photo.

• Has the advice of a consultant skilled in the conservation of heritage landscapes been sought? If so, have their recommendations been implemented?

The advice of a heritage consultant was sought both for the original approvals which were approved by Council. The conclusion has been that there are no significant adverse heritage impacts that would arise from the proposed subdivision.

• Are any known or potential archaeological deposits affected by the landscape works? If so, what alternatives have been considered?

There are no known or anticipated archaeological deposits in the location of the proposed subdivision and no impact in this regard should arise as a result of the subdivision.

How does the work impact on views to, and from, adjacent heritage items?

The proposal subdivision would have no adverse impacts on views to and from the adjacent heritage items.

## 7.0 CONCLUSION

The proposed works in this development application do not adversely affect the identified heritage significance of any of the heritage listed properties that adjoin the subject site, and in particular the State Heritage Item, 'Coppins', or the role of those places as contributing elements in the identified C7 Urban Conservation Area. The application is similar to DA 538/13 for a large single dwelling on the allotment, previously approved by Ku-ring-gai Council as having an acceptable impact. I would therefore recommend the heritage aspects of this application be approved.

Brad Vale Senior Heritage Consultant NBRS+PARTNERS ARCHITECTS