STATEMENT OF HERITAGE IMPACT

Bushells Factory Redevelopment 160 Burwood Road, CONCORD



Job No. 8364 September 2019



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<u>Cover page</u>: Eastern façade of the factory located at 160 Burwood Road, Concord. (Source: Heritage 21, 09 March 2016)

The following table forms part of the quality management control undertaken by Heritage 21 regarding the monitoring of its intellectual property as issued.

Issue	Description	Date	Initials
1	Draft report (D1) issued for comment.	07.06.17	K.B
2	Report Issued (RI) for Planning Proposal.	13.06.17	K.B
3	Draft report (D1) issued for comment.	22.06.18	L.S
4	Report issued (RI).	30.07.18	L.S.
5	Draft report (D2) for Job 8364 issued for comment.	31.01.19	L.S.
6	Report issued (RI) for Job 8364.	06.02.19	L.S.
7	Report Issued (RI2) for Job 8364	100919	MN



1.0 INTRODUCTION

1.1 Background

Heritage 21 was appointed by Colliers International Project Management (formerly NixAnderson), in February 2016, to provide Heritage and Archaeological Consultancy services in relation to the redevelopment of the former Bushells Factory located at 160 Burwood Road, Concord ('subject site').

In November 2017, the City of Canada Bay Council reviewed the planning proposal for the site, raising their concerns and outlining their recommendations for the future redevelopment of the site. The updates made to the proposal have taken these recommendations into consideration and Colliers International has engaged Heritage 21 to update this Statement of Heritage Impact ('SOHI' or 'report') to reflect the changes made to the proposal and to assess the heritage impact of the proposed development.

1.2 Site Identification

The subject site is located at 160 Burwood Road, Concord, which falls within the boundaries of the Canada Bay Local Government Area ('LGA'). The site is approximately 3.9 hectares and is comprised of the following lots:

- Lot 2, DP 230294;
- Lot 398, DP 752023;
- Lot 399, DP 752023; and
- Lot 5, DP 129325.

The location of the site within the Concord local area and a current aerial photograph of the site are presented in Figures 1 and Figure 2.



Figure 1. Map showing the location of the site 160 Burwood Road within the Concord local area, as indicated by the red flag and yellow shading. (Source: NSW Land and Property Information, 'SIX Maps', n.d., http://maps.six.nsw.gov.au/).



Figure 2. Current aerial photograph of the site, outlined in red. (Source: NSW Land and Property Information, 'SIX Maps', n.d., http://maps.six.nsw.gov.au/)

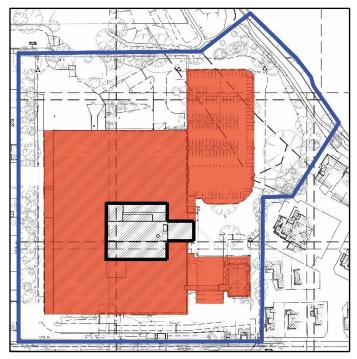


Figure 3. Plan of the existing site, the Former Bushells Factory Building core is outlined in black. (Source: Colliers International)

1.3 Heritage Context

1.3.1 Heritage Listings

The subject site is **not** listed as an item of environmental heritage in the *Canada Bay Local Environmental Plan 2013* (CLEP) nor is it located within the boundaries of a heritage conservation area.

The subject site is also **not** listed in the NSW State Heritage Register, the National Heritage List, the Commonwealth Heritage List or the Register of the National Trust of Australia (NSW).

A Heritage Listing Nomination Report was prepared by Heritage 21 in January 2019 that will be submitted to the City of Canada Bay Council, for the proposed inclusion of the subject building as an item of environmental heritage in the Canada Bay Local Environmental Plan 2013. As the Former Bushells Factory Building is not presently listed as an item of environmental heritage, this report does not treat the subject site as a heritage item. However, an assessment of the cultural significance of the subject site is undertaken in Section 3.0.

1.3.2 Heritage Items in the Vicinity

The subject site is adjacent to or within the vicinity of the following items of environmental heritage as listed in the CLEP 2013:

Name	Address	Significance	Number
Massey Park Golf Course	1 Ian Parade (also known as 1C and 1P Ian	Local	1259
grounds and Sanders Reserve	Parade)		
Street trees	Burwood Road (between Crane Street and	Local	156
	Duke Avenue)		
Bayview Park	166P Burwood Road	Local	I54

The site's proximity to these heritage items are shown in Figure 4 below.

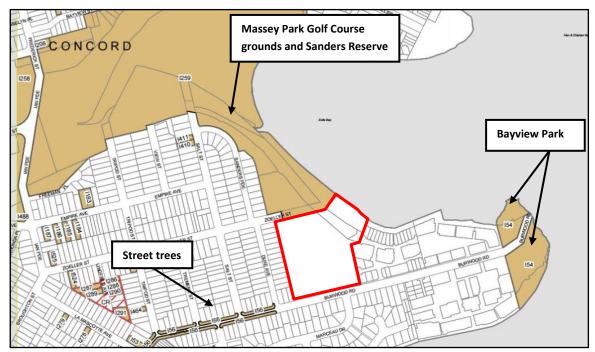


Figure 4. Heritage map HER_004 showing the location of subject site outlined in red and the heritage items located in the vicinity are brown. (Source: City of Canada Bay council, 'Canada Bay Local Environmental Plan,' 2013, https://www.legislation.nsw.gov.au/#/view/EPI/2013/389/maps)

1.4 Purpose

The subject site is located within the vicinity of several heritage items as listed under Schedule 5 of the CLEP 2013. Sections 5.10(4) and 5.10(5) of the CLEP 2013 require Council to assess the potential heritage impact of non-exempt development such as the proposed (refer to Section 4.0) onto the cultural significance of heritage items that are located within the vicinity. This report has been prepared on behalf of the owner of the subject site to enable Canada Bay Council to ascertain whether or not the proposal would have a negative, neutral or positive impact upon the significance of these heritage items.

1.5 Methodology

The methodology used in this SOHI is consistent with *Statements of Heritage Impact* (1996) and *Assessing Heritage Significance* (2001) published by the Heritage Division 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* 2013 ('Burra Charter').

1.6 Authors

This SOHI has been prepared by Paul Rappoport and Kaylie Beasley, of Heritage 21, Heritage Consultants. Further updates to the report have been made by Lauren Schutz, Heritage Consultant of Heritage 21, overseen by Paul Rappoport.

1.7 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 report relies on both primary and secondary sources; however, archival research has been limited to that which could be accessed within the timeframe allowed in order to complete this report.
- It is beyond the scope of this report to address Indigenous associations with the subject site or to locate or assess potential or known archaeological sub-surface deposits on the subject site or elsewhere. Please refer to the *Aboriginal Heritage Due Diligence Assessment* (prepared by Heritage 21, June 2017) for a discussion on the Indigenous associations with the subject site.
- It is beyond the scope of this report to assess items of movable heritage.
- Heritage 21 has only assessed aspects of the subject site that were visually apparent and not blocked or closed or to which access was not given or was barred, obstructed or unsafe on the day of the arranged inspection.

1.8 Copyright

Heritage 21 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, date and Heritage 21's authorship.

2.0 HISTORICAL RESEARCH

2.1 Local History

2.1.1 Pre-European History

The Canada Bay area was originally occupied by the Wangal clan whose name, it is believed was derived from the word 'wanne', meaning west. According to the City of Canada Bay Historical Society, the earliest recorded contact between the Wangal clan and Europeans occurred on the 5 February 1788 when Captain John Hunter led an exploratory expedition along the Parramatta River. Lieutenant Bradley, RN recorded the following:

At daylight having a guard of marines proceeded to the upper part of the harbour again, passing several natives in the caves as we went up and on the shore near the place we left beads and some other things, who followed us along the rocks calling to us. We landed to cook our breakfast on the opposite shore to them. We made signs for them to come over and waved green boughs. Soon after seven of them came over in two canoes and landed near our boats. They left their spears in the canoes and came to us. We tied beads, etc., about them and left them our fire to dress mussels which they went about as soon as we put off.²

A number of formally recorded Aboriginal places have been identified within the City of Canada Bay, with the majority located in the vicinity of the river foreshores.³

2.2.2 European Settlement and Beyond

The following historical information has been extracted from Section 8 of the *Canada Bay Local Planning Strategy 2010*:

After Parramatta was established as an agricultural district, a rough track between Sydney and Parramatta was created to supplement the use of the river as the main transport link between the two towns. This track, created in 1791, marked the beginning of Parramatta Road. Longbottom Stockade was established at the midpoint of the road as an overnight detention point for the gangs of convicts. This stockade was later to develop into the suburb of Concord. Between 1840 and 1842 it held 58 Canadian exiles after whom the suburb of Canada Bay is named.

Meanwhile, land grants close to the bays and headlands of Parramatta River were being given to settlers such as Surgeon John Harris (Five Dock), Isaac Nichols (Yaralla), Thomas Bishop (between Majors Bay and Kendall Bay).

³ Gregory Blaxell, A Pictorial History of City of Canada Bay (Alexandria: Kingsclear Books, 2010), 3.



¹ City of Canada Bay Heritage Society, 'Aborigines: Original Occupants of the Area', 2016, http://www.concordheritage.asn.au/concordhistory/aborigines accessed 16 March 2016.

² Ibid. accessed 16 March 2016.

Transport continued to focus on Parramatta River and Parramatta Road for some time. In 1829 the construction of [the] Great North Road through the present day Five Dock, Wareemba and Abbotsford was complete. This was a highly significant infrastructure project, providing a land route from Sydney to the Hunter Valley. The road relied on a punt to cross Parramatta River between Abbotsford Point and Kissing Point.

Through most of the nineteenth century, the settlement pattern in the area was a mix of large estates, small holdings and small villages. Towards the end of the nineteenth century, the establishment of industries such as the Australian Gas Light Company at Mortlake and the Dunlop Tyre Factory at Birkenhead Point (Drummoyne) led to increases in the growth of the nearby villages. Access to the river also prompted the re-development of some of the larger waterfront estates for industries such as Phoenix Iron Works. The only nineteenth century estate to remain from this period without substantial redevelopment is the Yaralla Estate of Thomas Walker.

The development of public transport routes including trams along Victoria Road, Great North Road, to Cabarita and Mortlake and the construction of the northern train line through North Strathfield and Rhodes also helped to foster industrial growth. Arnott's Biscuits established a factory at North Strathfield because of its access to the new rail line.

Much of the residential development of the Council area occurred in the late nineteenth century through to the Inter-War period. Many of the development[s] relied on access to transport as well as proximity to industrial places for employment. The influence of the garden suburb movement ensured proximity to parkland and the planting of street trees that continue to add to the amenity of the area.

The late twentieth century has seen the most dramatic change to the Council area with the rehabilitation and redevelopment of many of the large industrial sites. Most of these have been replaced with medium density residential and commercial developments that enjoy the proximity of the sites to Parramatta River.4

2.2 **Site History**

2.2.1 **Development of the Site**

Natural Environment

The subject site is located on the shores of Exile Bay, one of the many bays located along the Parramatta River. Prior to European settlement it has been recorded that the natural vegetation of

⁴ City of Canada Bay Council, 'Canada Bay Local Planning Strategy 2010', 2010, 175–176, http://www.canadabay.nsw.gov.au/futureplanning-local-planning-strategy.html.



Alexandria

the site largely consisted of a mixture of Eucalypt woodland in the inland areas with mangroves distributed along the shoreline waters (see Figure 5).⁵



Figure 5. Detail from map showing the distribution of original natural vegetation within the Concord area including the subject site (indicated).⁶

European Settlement

It is evident from a Parish map, dated from approximately the late 1800s, that the subject site formed part of the Longbottom Stockade land area (see Figure 6). The Longbottom Stockade, as described in Section 0, was originally established to detain convicts transported west to Parramatta as it was located approximately midway between Sydney city and Parramatta. It later became the detention centre for several Canadian exiles that had been transported to Australia. ⁷

By 1915, the subject site and surrounding land had been subdivided with the existing street alignments generally evident in parish maps from this period (see Figure 7). It appears that the site consisted of three different lots with each under the ownership of separate individuals who included Mick O'Toole, Esther Lewis and Thomas Hunter. The foreshore area, which currently forms part of

⁷ City of Canada Bay Council, 'Canada Bay Local Planning Strategy 2010', 175–176.



⁵ Concord Heritage Study: Thematic History (Perumal, Wrathall & Murphy Pty. Ltd., 1986).

⁶ Ibid.

the site, is not included within any of these three allotments, it appears to be designated separately and only identified by a number. It is evident that the existing Burwood Road was known as Wharf Road during this period (see Figure 7). It is unclear when the name was changed, however, a historical map of the area dated c. 1934 uses the existing name of Burwood Road, so it can be surmised that the change occurred sometime within the 1915 – 1934 period (see Figure 8).

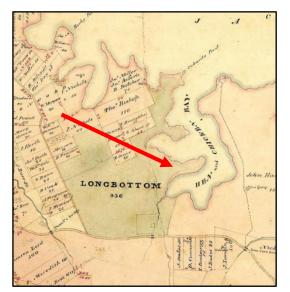


Figure 6. Detail from Concord Parish map (c.1800s) with the approximate location of the subject site indicated.⁸

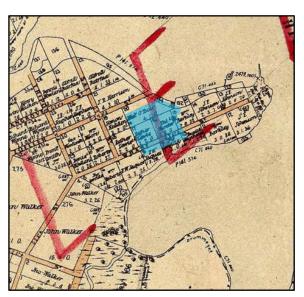


Figure 7. Detail from parish map (c. 1915) with the approximate location of the subject site indicated in blue.⁹

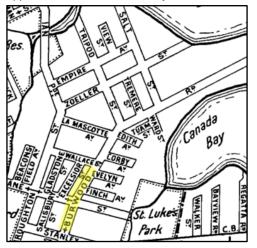


Figure 8. Detail from Gregory's Sydney Directory c.1934 using existing name of Burwood Road.¹⁰

Reclamation of Foreshore Areas

Beginning in the 1920s, the local Council began to undertake a series of reclamation projects in the Hen and Chicken Bay area, including in the vicinity of the subject site at Exile Bay (see Figure 9). The

¹⁰ 'Gregory's Sydney Directory Section 40' (Concord, 1934), http://voommaps.com/historical-maps/1934-gregorys-sydney-street-directory/.



⁸ NSW Land and Property Information, 'Historical Land Records Viewer', n.d., n. ed 0, sheet 3, http://images.maps.nsw.gov.au/pixel.htm accessed 8 March 2016.

⁹ Ibid., n. ed. 0, sheet 1 accessed 8 March 2016.

aim of these projects was to turn the swampy foreshore areas into developable spaces. ¹¹ The existing nature of the foreshore areas including Massey Park Golf course¹² and Bayview Park¹³ are the result of reclamation projects. According to research, 48 acres of swampland was reclaimed for the Massey Park Golf course and this took 12 years to "fill the hungry swamp with fill from the municipality". ¹⁴ A three metre concrete sea wall, which currently separates the site from Exile Bay, also appears to have been constructed as part of the reclamation works, however, historical photographs of the subject site indicate that it was constructed during reclamation works carried out post-1943 (see Figure 10).



Figure 9. Reclamation works at Exile Bay, c.1930.¹⁵

Pre-Construction of Factory

It is apparent from 1943 aerials of the subject site that construction on the site had occurred by this period. A timber mill and wharf were located in the northern section of the site with the remaining area largely undeveloped aside from some minor constructions such as access roads to these built structures. Surrounding the site, industrial development was evident towards the east and residential development was located south of Burwood Road. The area to the west of the site, which is currently occupied by residential development, was undeveloped during this period (see Figure 10).

¹⁶ Gregory Blaxell, A Pictorial History of City of Canada Bay, 110.



¹¹ Concord Heritage Study: Thematic History, 5–6.

¹² Ibid.

¹³ NSW Office of Environment and Heritage, 'Bayview Park', *State Heritage Inventory*, accessed 17 March 2016, http://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=2890319.

¹⁴ NSW Office of Environment and Heritage, 'Massey Park Golf Course and Sanders Reserve', accessed 16 March 2016, http://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=2890346.

¹⁵ City of Canada Bay Council, 'Canada Bay Image Library', accessed 16 March 2016,

http://imagelibrary.canadabay.nsw.gov.au/Library/#1458173124818_0.



Figure 10. Detail from 1943 aerial imagery of the subject site. ¹⁷

Construction of Existing Factory

The subject site was purchased by the company Bushells Pty Ltd during the mid-1950s for a reputed sum of 85,000 pounds. The purpose-built factory which currently occupies the site was constructed in two stages (see Figure 11 to Figure 13). The first stage occurred in c.1957-58 and the second stage, which saw the assembly of the chimney stack, occurred during the 1970s. It is not known definitively but historical research suggests that the architects responsible for the initial 1950s factory design were Brewster Murray Architects. 20

Property cards of the various development and building approvals in relation to the former Bushells factory, which were provided to Heritage 21 on the 23 March 2016 by the City of Canada Bay Council, indicate that regular additions and alterations have occurred at the subject site between its construction in the 1950s and the 1990s. In addition to the chimney or metal exhaust stack, various internal additions, installation of new equipment, including a storage silo for spent coffee, and alterations to the site landscaping are suggested. The property cards also indicate that the detached office building, which is currently located east of the factory building, was constructed during the late 1980s period. Since the 1980s, only minor additions and repairs appear to have been made at the site.

²⁰ Tanner Architects, 'Former Bushells Building Conservation Management Plan' 2008, 17.



¹⁷ NSW Land and Property Information, 'SIX Maps' accessed 8 March 2016.

¹⁸ FreshFood, 'Bushells Coffee: Our Story', 2015, http://www.bushellscoffee.com.au/our-story/.

¹⁹ City of Canada Bay Heritage Society, 'Concord's Industrial Development', 2016,

http://www.environment.nsw.gov.au/heritageapp/heritagesearch.aspx accessed 16 March 2016.



Figure 11. Bushells Factory, c. 1966, without chimney.²¹



Figure 12. Massey Park weir with Bushells Factory visible on right side, c.1967.²²



Figure 13. Bushells Factory and surrounding development, c.1970.²³

Prior to the construction of the subject site factory, Bushells was operating from a premises located in Harrington Street, The Rocks, and had been since 1924.²⁴ These premises continued to be used for operations until 1975 by which time all operations have been incrementally transferred to the subject site.²⁵ The printers were the first to be relocated to Concord, followed by packaging and lastly the office staff.²⁶ Reportedly, production commenced at the Concord site in 1958.²⁷

The *Official Newsletter of the Concord Heritage Society* records the following about the Bushells factory in Concord:

Approximately 300 men and women were employed by the company at Concord. Their work consists mainly of the roasting and manufacture of ground and instant coffee, the production of coffee essence, and the blending and packing of tea and teabags.²⁸

Photographs dating from the 1970s show that extensive residential development to the west of the subject site had occurred prior to this period and industrial development was present east of the site (see Figure 13 and Figure 14).

²¹ City of Canada Bay Council, 'Canada Bay Image Library'.

²² Ibid.

²³ Ibid.

²⁴ Tanner Architects, 'Former Bushells Building Conservation Management Plan', 17.

²⁵ Ibid., 18.

²⁶ Ibid.

²⁷ FreshFood, 'Bushells Coffee: Our Story'.

²⁸ Official Newsletter of the Concord Heritage Historical Society, 'More Industries on Exile Bay Bushells Pty.Ltd.', *Nurungi Remembered*, June 2007, 133 edition.



Figure 14. Detail from c.1977 aerial photograph of the subject site (indicated).²⁹



Figure 15. Interior of the factory located at the subject site. c. 1980.³⁰

Bushells Pty Ltd was sold in 1978 to Brook Bond Leibig Ltd who made large investments in the coffee side of the business. According to research, a several pieces of machinery were acquired during the 1980s including a continuous roaster for instant coffee and an instant coffee agglomerator.³¹ In the late 1980s, Brooke Bond Leibig Ltd was acquired by the company, Unilever.³² Unilever went on to further improve and expand the coffee business which incorporated investment in research and the acquisition of other coffee companies including Robert Timms.³³ In April 1998, the coffee brands and business was purchased from Unilever by FreshFood Holdings Sydney Pty Ltd. The Bushells tea brands remained with Unilever.³⁴

The subject site currently remains in the ownership of FreshFood Holdings Sydney Pty Ltd who continue to manufacture coffee at the site for distinguished coffee brands including The House of Robert Timms, Bushells Coffee, Picco, Europa and Café Bar. Since the 1970s, the industrial development which formally adjoined the subject site has gradually declined and has been replaced by residential development.



²⁹ City of Canada Bay Council, 'Canada Bay Image Library'.

³⁰ Fresh Food, 'Our Story', 2015, http://www.roberttimms.com.au/our-story/.

³¹ FreshFood, 'Bushells Coffee: Our Story'.

³² Gregory Blaxell, A Pictorial History of City of Canada Bay, 110.

³³ Fresh Food, 'Our Story'.

³⁴ Gregory Blaxell, A Pictorial History of City of Canada Bay, 110.

³⁵ Fresh Food, 'Our Story'.

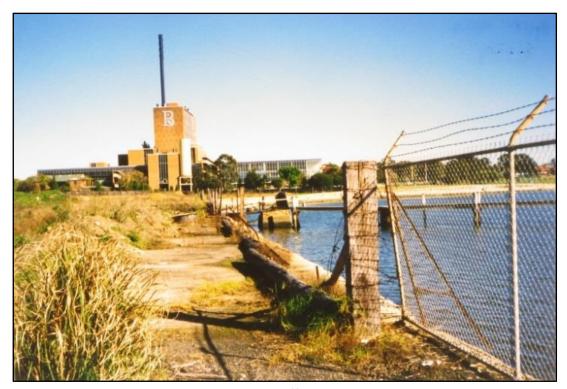


Figure 16. View looking west towards the subject site, c 1991.36



Figure 17. View towards the subject site from the eastern side of Hen and Chicken Bay, c. 1995.37

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 $^{^{\}rm 36}$ City of Canada Bay Council, 'Canada Bay Image Library'.

³⁷ Ibid.

3.0 PHYSICAL DESCRIPTION

Locality and Setting

The subject site is located in the Inner West suburb of Concord, which is located approximately 12 kilometres west of the Sydney CBD.

The site is located in a predominately residential area with one and two storeys detached and semidetached dwellings located along the western boundary and also to the south of Burwood Road, which demarcates the site's southern boundary. Similarly, medium density residential developments are located to the east and south east. The Massey Park Golf Course and Sanders Reserve (heritage item I259) adjoins the subject site to the north with Exile Bay marking the north-eastern boundary of the site.

3.2 **Site Layout and Structures**

3.2.1 **Former Bushells Factory Building**

A multi-storey brick and concrete factory with its imposing chimney stack is the main structure located on the subject site. The factory is orientated north-south and sited in the western portion of the site with a generous setback from all four site boundaries. The eastern and southern facades of the factory largely consist of brick and glazed areas with the northern and western facades incorporating large areas of precast concrete panels. The main façade of the factory, the eastern façade which contains a large B for Bushells in addition to a tea leaf and coffee bean, overlooks Exile Bay (see Figure 24). In addition to the Former Roasting Hall core tower (see Figure 3), the building also includes later additions that were constructed to incorporate warehouse areas and the new blending tower.

3.2.2 Administration Building

A two-storey administration building is located on the eastern side of the factory with a covered walkway joining the two structures. The administration building which was constructed in the late 1980s period is largely brick with timber features such as half-timbered gables and timber balconies which is reminiscent of an earlier architectural style (see Figure 26). A security booth/gatehouse and accompanying boom gates are located at the Burwood Street entrance into the site and a metal gas storage shed is also evident to the north of the factory.

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Figure 18. Detail of site plan drawn by G.J.Svehla, 11.03.94 with major structures and approximate boundaries of major landscaped areas indicated.

3.3 **Exterior**

The remainder of the site comprises of a combination of open area bitumen car parks, concrete and bitumen driveways and landscaped areas. A memorial plaque, commemorating a previous supervisor of the factory, is situated at the base of a tree which is located in the north-eastern section of the site. The site legally extends to the Exile Bay foreshore area, however at present, a chain link fence separates the site from the foreshore area. This foreshore area is currently occupied by a public walking path and concrete sea wall.

3.4 Setting

The overall nature of the subject site, the large industrial building set amidst soft landscaping on the water's edge, creates a pleasing juxtaposition enabling a physically loud structure to sit quietly within its surrounding environment. It displays characteristics of the 'Factory Garden Movement' which was developed around the ideology that situating factories within pleasant landscaped spaces which employees could enjoy would not only improve the aesthetics of the factory but so to the health of the workforce which in turn would lead to increased profits.³⁸

3.5 Views

Due to the scale of the factory, namely its chimney stack, the site has a high visibility from a number of vantage points in the local area (see Figure 19 to Figure 22)The factory's eastern façade is distinctive due to the 'B' signage that is located on the upper storeys of the factory wall (see Figure

³⁸ Helena Chance, "Consulting the Genius of the Plant" n.d., http://eprints.bucks.ac.uk/1424/1/Chance,%20Helena%20Consulting%20the%20genius%20of%20the%20plant.pdf.



24). The signage can be seen for some distance and contributes to the views of the factory, particularly from Hen and Chicken Bay and further east.

Due to the scale of the factory in comparison with the surrounding smaller scale development, views between the site and the neighbouring heritage items (I259, I54 and I56) are evident (see Figure 19 to Figure 22). These existing views are largely limited to the upper storeys of the factory and chimney stack. The adjacent Massey Park Golf Course grounds and Sanders Reserve (I259) is the only heritage item which is highly visible from within the subject site.



Figure 19. View of subject site from Hen and Chicken Bay, c. 2007.³⁹



Figure 21.View towards the subject site from heritage item I259: Massey Park Golf Course and Sanders Reserve, c.2015.⁴⁰



Figure 20. View towards the subject site from heritage item I54: Bayview Park (I54). (Heritage 21, 30.03.16)



Figure 22. View towards the subject site from heritage item I56: Street Trees. (Heritage 21, 30.03.16)

3.6 Interiors

Internally, the factory is divided into seven storeys. The lower storeys (lower ground floor – first floor) are divided into a series of large spaces which appear to be used for later stages of the manufacturing process such as packing, quality control and distribution. The storeys above contain the equipment required to undertake the initial manufacturing processes such as roasting and drying.



³⁹ City of Canada Bay Council, 'Canada Bay Image Library'.

⁴⁰ Ibid.

The fourth storey and above is one large vertical space in which plants involved in vertical production processes are located. A series of levels to access the plants from different heights are created by open steel mesh platforms. The space is naturally illuminated as glazing covers the entire span of the northern and southern walls of this space. This area is referred to as the translucent roasting hall.41

The interiors of the detached office building and the security booth/guardhouse were not inspected.

Condition 3.7

The subject site, specifically the purpose-built factory is still currently in operation for the manufacturing of coffee products. When Heritage 21 inspected the site on the 9 March 2016 the subject site appeared to be well maintained and generally in good condition. The factory itself did not present any obvious signs of poor condition aside from the expected deterioration related to its regular use.

3.8 **Photographic Survey**

The following photographs, taken by Heritage 21 on 09 March 2016, provide a visual survey of the site, its setting and notable fabric.



Figure 23. View of the covered walkway joining the eastern façade of the factory to the administration building.



Figure 24. View of the distinctive 'B' signage with tea leaf and coffee bean within the spaces of the letter.



Figure 25. View towards the eastern boundary with the security booth/guardhouse on the right.



Figure 26. Eastern façade of administration building with half-timbered gables shown.



Figure 27. View south-west encompassing the northern facade of the administration building and a detail of the eastern façade of the factory.



Figure 28. View north-east encompassing a large lawn area and the foreshore boundary of the site.



Figure 29. View west encompassing a detail of the factory's eastern façade and open-air car park.



Figure 30. View north towards Massey Park Golf Course and Sanders Reserve (1259).



Figure 31. Detail of northern façade of factory with precast concrete panels.



Figure 32. Western façade of the factory with landscaped area located along the western boundary evident on the right.



Figure 33. Memorial plaque located at tree base in the north-eastern section of the site.



Figure 34. Detail of the southern façade of factory and landscaping along southern boundary is evident on the left.



Figure 35. Detail of space located on the lower ground floor.



Figure 36. Detail of space located on the second floor.



Figure 37. Roof space located on second floor.

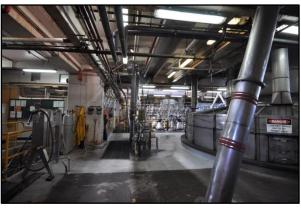


Figure 38. Detail of space located on the third floor.



Figure 39. View looking down of the roasting hall from fifth floor platform.



Figure 40. View looking down of the roasting hall from fifth floor platform.



Figure 41. View of clerestory aluminium glazing as viewed from the second-floor roof space.



Figure 42. Curved steel handrails located in stairwell located between floor five and floor three.

4.0 HERITAGE SIGNIFICANCE

4.1 Heritage items in the Vicinity

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 significance of the heritage items which are located within the vicinity of the subject site, it is necessary to first ascertain the significance of these pertinent heritage assets.

The following Statements of Cultural Significance for the relevant heritage listed items have been extracted in full from the relevant site cards provided on the NSW State Heritage Inventory.

Heritage Item	Address	Heritage Number	Statement of Cultural Significance
Massey Golf Course and Sanders Reserve	1 Ian Parade (also known as 1C and 1P Ian Parade)	1259	Park originating from drainage and filling works from 1930s Depression period. Displays planting character from the Post-war period, dating from after the layout of the golf course fairways and roughs in 1953, to recent periods, reflecting a shift in community values and increasing environmental awareness after the 1970s and 80s period. Visually significant from the bay. 42
Bayview Park	Burwood Road (between Crane Street and Duke Avenue)	156	Foreshore park in prominent location conserving mangroves and notable for monument to the Canadian exiles who were discharged at this point in 1840 and held at the nearby Longbottom Stockade. Replanting from c.1980 forms an important focal point in the riverscape. ⁴³
Street Trees	166P Burwood Road	154	Characteristic street trees from c.1940. Notable as streetscape element. ⁴⁴

http://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=2890321.



⁴² NSW Office of Environment and Heritage, 'Massey Park Golf Course and Sanders Reserve'.

⁴³ NSW Office of Environment and Heritage, 'Bayview Park'.

⁴⁴ NSW Office of Environment and Heritage, 'Street Trees', n.d.,

4.2 Subject Site

In assessing the appropriateness of nominating the site for heritage listing, it is crucial to understand the cultural heritage value of a place. This understanding of significance then informs and guides decision-making so as to retain values into the future. The assessment to ascertain the significance of a place is carried out below, based upon criteria specified by NSW OEH.

Criterion	Assessment
A. Historical Significance	The subject site is associated with the historical development of the
An item is important in the course, or	Concord area, emerging from a convict detention settlement into a heavily
pattern, of NSW's or the local area's	industrialised area. Developing during the second phase of industrialisation
cultural or natural history (state/local	of Concord, the subject site was continuously used for the production of
significance).	coffee and tea for over 60 years. The reduced operations at the subject site
	reflects the overall reduction of industrial operations within the surrounding
	area, and the redevelopment of Concord into a residential area.
	The development of the subject site is also closely associated with the
	broader development of the "Factory Garden Movement." Encouraging the
	establishment of landscaped gardens to both improve the aesthetic of the
	subject site, alongside promoting the health of employees, the evolution of
	the subject site reflects the concepts associated with the movement.
	Accordingly, the subject site demonstrates historical significance at a local
	level due to its association with the development of Concord and the
	Factory Garden Movement.
B. Associative Significance	The subject site was acquired in the 1950s by the Bushells Company. The
An item has strong or special	Bushells brand has manufactured in Sydney for over 90 years and is part of
association with the life or works of a	the collective public consciousness as an iconic Australian brand. The
person, or group of persons, of	subject site is also associated with coffee entrepreneur Robert Timms Junior
importance in NSW's or the local area's	who during the 1970s owned the largest privately-owned tea and coffee
cultural or natural history (state/local	company in Australia.
significance).	
	Accordingly, due to the connection between the subject site and the
	Bushells and Robert Timms companies, the subject site attains the requisite
	standards of associational significance at the local level.
C. Aesthetic Significance	The scale of the factory is significantly greater compared to the surrounding
An item is important in demonstrating	development and therefore, is a recognisable landmark in the local area due
aesthetic characteristics and/or high	to its high visibility. Its distinctive chimney stack and 'B' signage also
degree of creative or technical	contribute to its landmark qualities.
achievement in NSW or the local area	
(state/local significance).	The factory also demonstrates characteristics specific to multi-storey
	industrial buildings. These include the large glazed northern and southern
	walls of the roasting hall which utilises clerestory aluminium framed glazing.

Criterion	Assessment
	The overall nature of the subject site with the large industrial building set amidst soft landscaping on the water's edge, creates a pleasing juxtaposition enabling a physically loud structure to sit quietly within its surrounding environment.
	As a landmark, the former Bushells Factory building attains the requisite standard of aesthetic significance at a local level. While the subject site has undergone significant modification since construction, particularly through the construction of additional buildings and additions to the existing, the aesthetic significance of the subject site can be attributed to the factory building, notably the tower, and the landscaped setting.
D. Social Significance An item has a strong or special association with a particular community or cultural group in NSW or the local area for social, cultural or spiritual reasons (state/local significance).	Throughout the operational history of the subject site a large contingent of people would have been employed. As such, the site would be important for its special association with the local community as well as for engendering that sense of place within the wider Sydney community. A plaque commemorating the employment of a supervisor was observed at the subject site which suggests that there was a great deal of respect between employer and employees.
	The factory with its 'B' signage would have and continues to be widely known within the local Concord area.
	Additionally, the subject site incorporates key characteristics of the 'Factory Garden Movement' which was developed around the ideology that by situating factories within pleasant landscaped spaces which employees could enjoy, not only would the spaces enhance the aesthetics of the factory but also the health of employees. This awareness of the wellbeing of employees would have enhanced the sense of identity and belonging for employees, their families and the wider community.
	Accordingly, the subject site attains the requisite standards of social significance at a local level.
E. Technical/Research Significance An item has potential to yield information that will contribute to an understanding of NSW's or the local area's cultural or natural history (state/local significance).	The brick and concrete factory building is important for its ability to demonstrate technical aspects with regard to multi-storey industrial building construction. In particular, the large glazed northern and southern walls of the roasting hall which utilises clerestory aluminium framed glazing. However, the building has undergone significant modification, particularly through the replacement of the machinery and the construction of later additions. The later addition buildings were constructed in materials and with techniques still commonly used today and do not offer the potential to further our understanding of technical knowledge.

Criterion	Assessment
	Although the subject site does not offer the potential to yield further
	technical or research information as a whole, the Former Bushells factory
	building demonstrates technical significance at a local level.
F. Rarity	The subject site is a rare extant example of an industrial site operating
An item possesses uncommon, rare or	during the twentieth century in the Concord local area. Other industrial
endangered aspects of NSW's or the	sites which were operating in the Concord area during the twentieth
local area's cultural or natural history	century, such as the Farleigh, Nettheim & Company Tannery and the Austral
(state/local significance).	Bronze Factory, have since their closure, been demolished and undergone
	redevelopment to serve other non-industrial purposes.
	It is also apparent that the subject site is rare in that the whole
	manufacturing process is confined to one large building rather than
	separated between numerous smaller buildings. As such, the significance of
	the manufacturing process is attributed to the one building, particularly as
	the other buildings were constructed during later periods and are largely
	considered to be intrusive.
	Accordingly, the factory building demonstrates rarity at a local level, as a
	single building that has been continuously used as a factory since
	construction and demonstrates landmark qualities.
G. Representativeness	The brick and concrete factory is an intact example of a purpose-built
An item is important in demonstrating	factory displaying key characteristics of multi-storey industrial building
the principal characteristics of a class of	construction. The subject site also exhibits characteristics of the 'Factory
NSW's or the local area's cultural or	Garden Movement' on a modest scale.
natural places or cultural or natural	
environments (state/local significance).	Accordingly, the factory building and the landscaping setting demonstrates
	representativeness at the local level.

4.3 Statement of Cultural Significance

The Former Bushells Factory building located at 160 Burwood Road, Concord demonstrates aesthetic, historical, associative, social, technical and research significance at a local level, also displaying rare and representative qualities. As a landmark within the surrounding area, the Former Factory Building can be viewed throughout Concord, particularly due to the largely low-scale residential development that has emerged in the surrounding area. Although the building has undergone significant modification, including the removal of original machinery, significant features such as the chimney stack, 'B' façade and the aluminium clerestory window frames have been retained and are not only socially significant but also offer the potential to further our technical knowledge.

In addition to the significance attributed to the factory building, and in particular the chimney stack, the landscaped setting is also a significant part of the historical, social and representative qualities associated with the development of the subject site. Associated with the 'Factory Garden

Movement' ideology, the site developed as a space to promote the health of employees and the aesthetic qualities of the subject site.

Although the subject site does have an association with Bushells and Robert Timms Junior, the significance of the subject site derives from the landmark qualities and production of coffee and tea within the factory building, including the chimney stack with the 'B' façade and the landscaped setting. This is due to both its aesthetic qualities and the association with the "Factory Garden Movement" and promoting the health of employees.

5.0 IDENTIFICATION & ASSESSMENT OF IMPACT

5.1 **Proposed Works**

The Proposed Masterplan includes the following proposed works:

- The Former Bushells Factory Building would be retained;
- Numerous buildings are to be constructed on the site including three 6-storey buildings, five 5-storey buildings, one 4-storey buildings, six 3-storey buildings, a single 2-storey building, and a single 9-storey building;
- The proposed buildings would be constructed to ensure that the buildings located along Burwood Road would match the existing scale located along the street;
- The proposed buildings to be constructed closer to the waterfront would also be lower with the higher buildings to be constructed within the centre of the redevelopment to minimise the impact of the proposed development on the public views to the subject site and the heritage items in the vicinity;
- The significant landscape boundaries would be retained;
- A public park would be created on the foreshore;
- The proposed buildings would be used for a mixture of residential and recreational uses, including the existing factory building which would be adaptively reused for residential, retail and sporting facilities; and
- A new public street network would be created in addition to the existing grid.

5.2 **Drawings**

Specific details of the proposed development are shown in plans prepared by BVN Architects Issue F, dated 06 September 2019, received by Heritage 21 on 10 September 2019. These are partly reproduced below at small scale for reference purposes; the full-size drawings accompanying the application should be referred to for any details.

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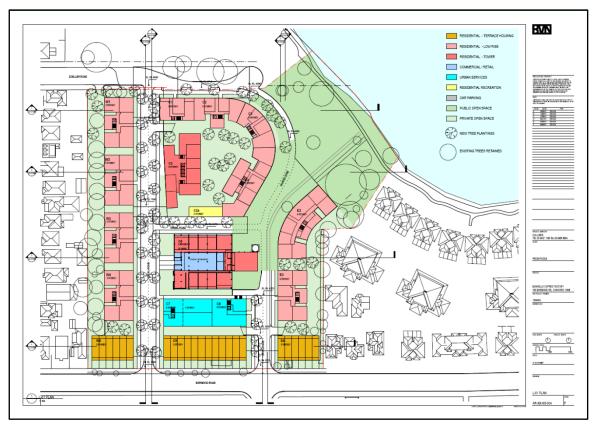


Figure 43. Roof Plan, 002.

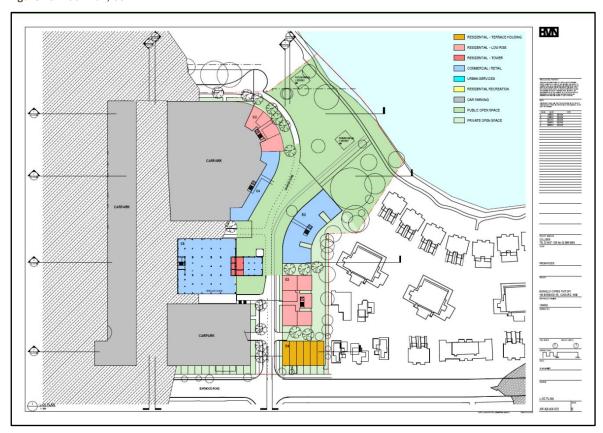


Figure 44. Level 01 Plan, 003.

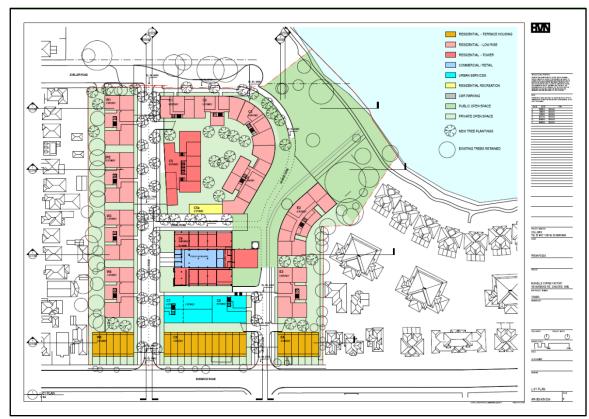


Figure 45. L-01 Plan, 004.

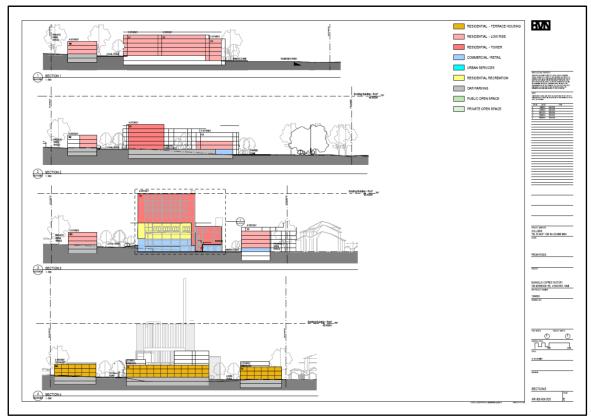


Figure 46. Long Sections, 005.

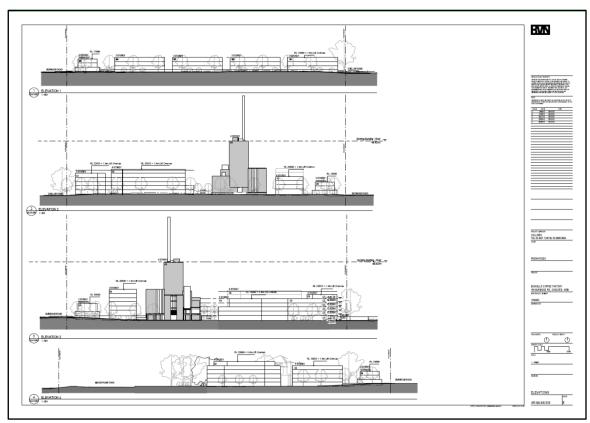


Figure 47. Elevations, 006.

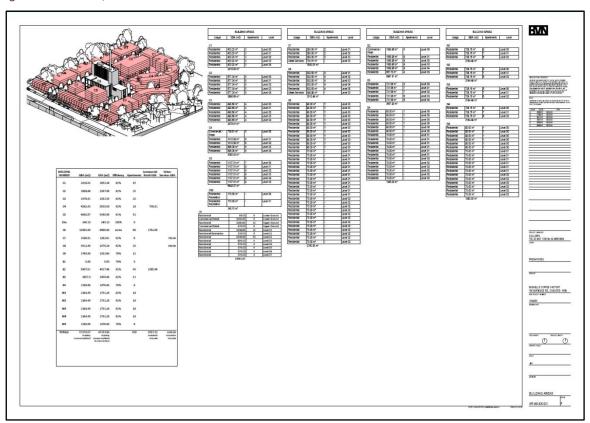


Figure 48. Building Mass, 001.

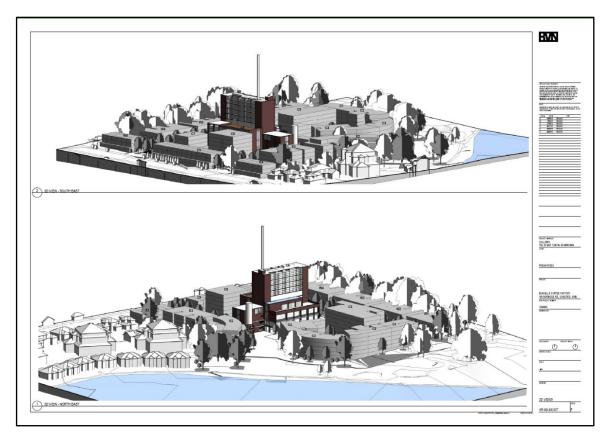


Figure 49. 3D Views, 007.

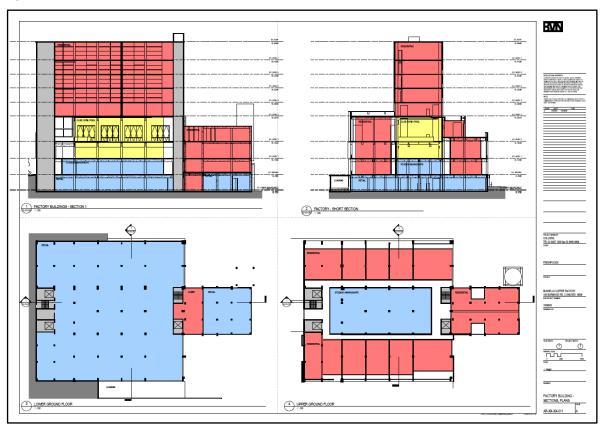


Figure 50. Factory Building – Sections, Plans, 011.

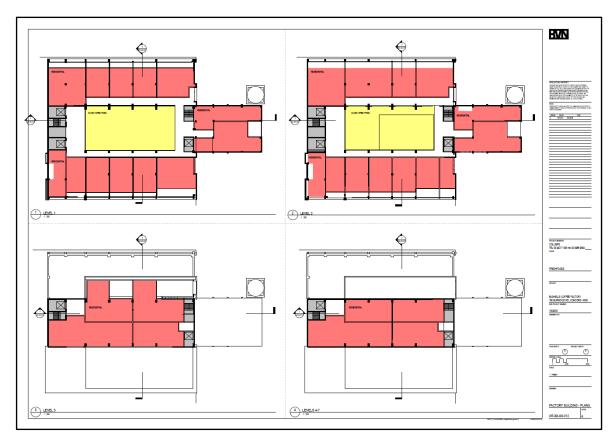


Figure 51. Factory Building – Plans, 012.

Heritage Management Framework 5.3

Below we outline the heritage-related statutory and non-statutory constraints applicable to the subject site including the objectives, controls and considerations which are relevant to the proposed development as described in Section 4.0 above. These constraints and requirements form the basis of our Heritage Impact Assessment in Section 5.4 of this report.

4.3.1 Canada Bay Local Environment Plan 2013

The statutory heritage conservation requirements contained in Section 5.10 of the CLEP 2013 are pertinent to any heritage impact assessment for future development on the subject site. The relevant clauses for the site and proposal are outlined below:

- (1) Objectives
- (2) Requirement for Consent
- (4) Effect of proposed development on heritage significance
- (5) Heritage assessment

4.3.2 Canada Bay Development Control Plan

Our assessment of heritage impact also considers the heritage-related sections of the Canada Bay Development Control Plan (CDCP) that are pertinent to the subject site and the proposed development. These include:

Part D - Heritage

D3 Development in the vicinity of heritage items

- D3.1 Setting
- D3.2 Scale
- D3.3 Siting
- D3.4 Materials and Colours

4.3.3 **NSW Office of Environment & Heritage guidelines**

In its guidelines for the preparation of Statements of Heritage Impact, the NSW Office of Environment & Heritage provides a list of considerations in the form of questions aimed at directing and triggering heritage impact assessments. ⁴⁵ These are divided into sections to match the different types of proposal that may occur on a heritage item, item in a heritage conservation area or in the

⁴⁵ NSW Office of Environment and Heritage, 'Statements of Heritage Impact' (Heritage Office and Department of Urban Affairs & Planning, 1996), NSW Heritage Manual, http://www.environment.nsw.gov.au/resources/heritagebranch/heritage/hmstatementsofhi.pdf.



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vicinity of heritage. Below are listed the considerations which are most relevant to the proposed development as outlined in Section 4.1 of this report.

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?
- Why is the new development required to be adjacent to a heritage item?
- How does the curtilage allowed around the heritage item contribute to the retention of its heritage significance?
- How does the new development affect views to, and from, the heritage item? What has been done to minimise negative effects?
- Is the development sited on any known, or potentially significant archaeological deposits? If so, have alternative sites been considered? Why were they rejected?
- Is the new development sympathetic to the heritage item? In what way (e.g. form, siting, proportions, design)?
- Will the additions visually dominate the heritage item? How has this been minimised?
- Will the public, and users of the item, still be able to view and appreciate its significance?

5.4 Heritage Impact Assessment

Below we assess the impact that the proposed works would have upon the heritage items in the vicinity. This assessment is based upon the Site Investigation (refer to Section 2.3), the Heritage Significance (refer to Section 3.1), the Proposed Works (refer to Section 4.0) and a review of the Heritage Management Framework (refer to Section 4.3).

4.4.1 Character and Social Use

The proposed redevelopment of the site, in accordance with the Masterplan, would have no impact on the curtilage or the physical fabric of the heritage items located within the vicinity as all works would be located within the boundaries of the subject site.

In terms of character, the proposed redevelopment of the site would differ from the existing nature of the subject site. The site is currently an oddity, both in terms of its character and scale within its immediate surrounds, as it is the last remaining site that maintains a link with the industrial history of the Concord area. The proposed redevelopment would be a reinterpretation of the site's distinctiveness and through this continue to provide an important link with the industrial history of the Concord area. In terms of the potential impact that this increased scale and bulk would have on the heritage items located within the vicinity, it is Heritage 21's opinion that the impact generated would not be substantially different to the neutral impact that the existing site currently has on the surrounding heritage items. The legibility of the surrounding heritage items would not be disturbed and through the redevelopment, and the maintenance of Concord's industrial history, the site would act as an important link in the understanding of the significance of the surrounding heritage items.

Additionally, the proposed redevelopment of the site would not interrupt the existing social use of these heritage items. The proposed redevelopment would create a site which encourages people to use the area, particularly with the recreational spaces that would be created. The site would provide a link between the site and the heritage items both visually and historically, demonstrating the history of the local area, the relationship between the heritage items and the continued use of the heritage items.

The inclusion of landscaped areas as part of the proposed redevelopment, including a public park, would provide a link with the surrounding heritage items and would respect the significance of the subject site, which is in part attributed to the contribution of the site to the Factory Garden Movement.

4.4.2 Views to and from heritage items

Views between the heritage items I54 (Bayview Park) and I56 (Street trees) and the subject site currently exist, although these existing views are largely limited to the upper storeys of the factory and its chimney stack. These views of the site would remain consistent particularly as the proposed development would include the construction of higher forms in the centre of the site, located within the site and away from the nearby heritage items and the waterfront. This would minimise the visual

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impact of the proposed development on the existing views, particularly as the scale and layout of the proposed buildings has been carefully considered with the topography of the site and the existing Bushells Factory building in mind. The layout would minimise the visual impact that the proposed development would have on the Massey Park Golf Course and the waterfront particularly as the primary existing views to the factory and its chimney stack would be retained with lower forms constructed around it. It is also noted that the proposed development would be consistent with the scale of the existing adjacent residential development.

Views between heritage item I259 (Massey Park Golf Course), which is located adjacent to the northern boundary of the site, would be further enhanced by the landscape works proposed by the proposed development.

Although the redevelopment of the site would potentially introduce new views between the subject site and the nearby heritage items, Heritage 21 would argue that these view lines would not detract from the significance of these heritage items.

4.4.3 Additional Considerations

The construction of lower buildings along the perimeter of the site would be consistent with the existing scale of Concord Road, per the recommendation of the City of Canada Bay Council. The scale of the buildings that would be constructed throughout the site have additionally been considered, with the lower forms to be placed along the boundaries and near the waterfront, to ensure that the impact upon the existing views to the site would be minimal. The highest form to be placed on the site would be located within the centre of the site and the scale has considered that of the existing factory building.

It is also important to note that aside from the consideration of the scale of the buildings that the proposed development would incorporate the creation of a public park on the foreshore and the introduction of additional recreational spaces. The proposed works would ensure the continued use of the site through the creation of an active village centre and open public spaces.

The proposed adaptive re-use of the Former Bushells Factory building is considered in depth in the Heritage Nomination Listing Report produced by Heritage 21 in February 2019. However, Heritage 21 is confident that in conjunction with a Salvage Schedule, a Conservation Management Strategy and an appropriate Interpretation Strategy that the significance of the subject building can be respected despite the proposed change of use of the subject site. A clear interpretation strategy would offer the potential to highlight the history of the subject site to all visitors, residents and employees on the subject site.

4.4.4 Relevant OEH Questions

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?

Response – The lower forms of the proposed development would be located adjacent to the heritage items to minimise the impact that the proposed development would generate upon the views to and from the heritage items.

Why is the new development required to be adjacent to a heritage item?

Response – The existing site is largely vacant; the proposed development would improve the contribution that the site is presently making to the local area and would strengthen the connection between the local site and the heritage items in the vicinity.

• How does the curtilage allowed around the heritage item contribute to the retention of its heritage significance?

Response – The proposed development would be located within the Bushells site and the higher forms would be setback from the golf course, ensuring that the proposed development would have a minimal impact upon the views to the Former Bushells Factory building from the golf course which is the basis of the relationship between the golf course and the existing site.

 How does the new development affect views to, and from, the heritage item? What has been done to minimise negative effects?

Response – The layout of the proposed development has sought to minimise the effects on views from both the heritage items in the vicinity and the waterfront through the proposed construction of higher forms in the centre of the site, with lower buildings to be constructed in addition, to minimise the impact of the public views upon the heritage item.

• Is the new development sympathetic to the heritage item? In what way (e.g. form, siting, proportions, design)?

Response – Yes, predominately through the siting of the buildings, as the lower forms would be constructed along the boundaries of the site and would minimise the visual impact upon the heritage items.

• Will the public, and users of the item, still be able to view and appreciate its significance?

Response – Yes, the proposed development would not impact upon the significance of the heritage items, nor minimise their significance. The proposed development would in fact include a number of open public spaces which would reinvigorate the area and would create greater links between the heritage items and the site.

6.0 CONCLUSION & RECOMMENDATIONS

6.1 Impact Summary

The NSW Office of Environment & Heritage's guidelines require the following aspects of the Architectural Concept Plan to be summarised.⁴⁶ This is based on the assessment of impact provided in Section 4.4 of this report.

5.1.1 Aspects of the proposal which respect or enhance heritage significance

In our view, the following aspects respect the heritage significance of the items in the vicinity:

- The redevelopment does not propose to alter the curtilage or the physical fabric of the surrounding heritage items;
- The site, through its scale and bulk, would be an interpretation of the site's distinct character within the local area;
- The views between the subject site and the heritage items would remain largely consistent with views from the heritage items dominated by the highest elements of the subject site;
- The proposed higher forms would be located in the centre of the site which would minimise the visual impact of the proposed buildings on existing views, particularly from Concord Road, the waterfront and the Massey Park Golf Course;
- The redevelopment would encourage and facilitate ongoing social use of the heritage items;
- The existing Former Bushells Factory Building would be retained; and
- Landscaping elements make reference to the nature of the surrounding heritage items and would reinvigorate the local area, particularly through the creation of a large public park on the foreshore.

5.1.2 Aspects of the proposal which could have detrimental impact on heritage significance

In our view, there are no aspects of the proposal which could be detrimental to the significance of heritage items in the vicinity. The positive impacts of the proposal have been addressed above in Section 5.1.1.

Mitigation Measures have been included in Section 5.3 below.

5.1.3 Sympathetic alternative solutions which have been considered and discounted

Heritage 21 was not involved in the design process of the proposed development. However, the previous proposal for the site did not take the heritage items or the existing Bushells Factory building into consideration. Additional changes have been made to the proposal, including the reduction in the scale of the proposed buildings, which has reduced the visual impact of the proposed works on the heritage items in the vicinity and the subject site.



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6.2 General Conclusion

In Heritage 21's opinion, the proposed redevelopment would positively contribute to the surrounding heritage items by encouraging and facilitating their ongoing use and appreciation. By locating the higher forms of the proposed development in the centre of the site, it would minimise the visual impact that the proposed works would have on the nearby heritage items, the waterfront and the streetscape. Locating the smaller forms next to the waterfront and the boundaries of the site would also minimise the impact of the proposed development upon the views to the former Bushells Factory building.

Heritage 21 is confident that the proposed development complies with the pertinent heritage framework and that the proposed character, scale and bulk of the proposed redevelopment would have a neutral impact on the significance of the heritage items located within the vicinity.

6.3 Mitigation Measures

To ensure maximum conservation of significance of the subject site Heritage 21 recommends the following:

- The listing of the Former Bushells Factory building as an item of environmental heritage in Schedule 5 of the Burwood Local Environmental Plan 2012. Heritage 21 have produced a Heritage Listing Nomination Report to be submitted to the City of Canada Bay Council for listing consideration.
- Due to historical evidence suggesting that a wharf was located in the subject site's foreshore
 area, Heritage 21 recommends that a marine archaeological potential assessment is carried
 out prior to any redevelopment of the foreshore area as remnant footings or similar which
 relate to this historical structure would be highly significant.
- An Interpretation Strategy should be prepared by a heritage professional for the subject site.
 This strategy should address the interpretation of the site's history and incorporate discussion on its relationship with the industrial development of Concord and the surrounding heritage items. This interpretation may include but should not be limited to the use of interpretive naming conventions, public signage and public art work.
- A Photographic Archival Recording (PAR) should be prepared by a suitably qualified Heritage Consultant prior to any development being carried out on the site. The report must consist of an archival standard photographic record of the site and buildings externally including the existing character of the streetscape and the views to and from the subject site and heritage items in the vicinity and general views to and from the site. The recording shall be undertaken in accordance with the guidelines for Photographic Recording of Heritage Items Using Film or Digital Capture (2006) prepared by the NSW Office of Environment & Heritage and copies should be retained in Council's Archives and Local Studies collection.

• Salvage Schedule. A Salvage Schedule should be prepared by a suitably qualified heritage consultant, to ensure the retention of significant fabric.

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