

21 – 25 McIntosh Street & 55 Werona Avenue, Gordon

Heritage Impact Statement

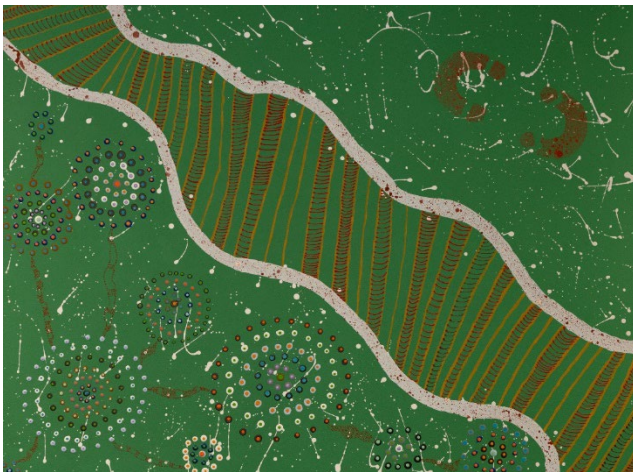
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Executive Summary

Urbis has been engaged by CPDM Pty Ltd on behalf of Werona Ave Residence Holding Pty Ltd to prepare the following Heritage Impact Statement (HIS) to accompany a State Significant Development Application (SSDA – 83478456) for updated proposed works to the properties located at 21-23 McIntosh Street & 55 Werona Avenue, Gordon (hereafter referred to as the 'subject site').

This HIS accompanies an Environmental Impact Statement (EIS) pursuant to Part 4 of the Environmental Planning and Assessment Act 1979 (EP&A Act), in support of a State Significant Development Application (SSDA) for the construction of the proposed residential flat buildings, reference SSD-83478456.

This report addresses the Secretary's Environmental Assessment Requirements (SEARs) issued for the project, notably:

Item	SEARs Requirement	Section of Report where response is provided
22. Environmental Heritage	Where there is potential for direct or indirect impacts on environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (where required), in accordance with the relevant guidelines.	Section 6 in this report.

The subject site is located within a Transport Oriented Development (TOD) Area on the TOD Sites Map in accordance with Chapter 5 of the *State Environmental Planning Policy (Housing) 2021* (Housing SEPP).

The subject site is not listed as a heritage item, but it is partially in a Heritage Conservation Area (HCA) under the *Ku-ring-gai Local Environmental Plan (KLEP) 2015*. 25 McIntosh Street Gordon, at the eastern end of the subject site is located within the Gordon Estate, McIntosh and Ansell Conservation Area (C15), under part 2 of Schedule 5 of the KLEP 2015.

The subject site is also in the vicinity and visual catchment of several items and HCAs listed under Schedule 5 of the KLEP 2015 and one item listed on both the KLEP 2015 and the State Heritage Register (SHR).

The proposal involves the demolition of the existing low-density residential buildings on the subject site and the construction three residential flat buildings with in-fill affordable housing. The new residential buildings would be 8-storeys (including roof level) with two levels of basement carparking, and the development would also include amenities and landscaping. The redevelopment of the subject site is proposed to be submitted as an SSDA under the Housing SEPP. Further details of the proposed works are included in Section 5.

This HIS has been prepared to determine the potential heritage impacts of the development on the heritage significance of the HCA and the heritage items in the vicinity, including State heritage item 'Eryldene' (SHR00019). A detailed impact assessment of the proposed works has been undertaken in Section 6 of this report.

The proposed development has been assessed to have an acceptable impact on the Gordon Park Estate, McIntosh & Ansell Conservation Area (C22) and the listed items in the vicinity. Key aspects of the proposal assessment are listed below:

- All houses which are within the subject site to be demolished are highly altered/pedestrian dwellings of no significance. Notably, the dwelling within the HCA dates from the 2000s and does not contribute to the character of the conservation area.
- The development scheme proposed for the subject site will establish a needed source of high-density residential living opportunities within the vicinity of multiple public transport corridors as per the provisions of Chapter 5 of the TOD SEPP.
- It is noted that the proposed building would be of a different scale and typology than that which currently exists. However, the proposal exists in a legislative context which will facilitate significant uplift of the same type in particular areas. The development would be in line with the planned future character of this area, notably the newly introduced TOD Housing SEPP update which allows for an increase in

density within a greater radius from specified stations and town centres. The framework anticipates increased density and a transition in built form as part of the NSW Government's strategic planning framework. The proposal responds to this planned future character through a carefully moderated built form, incorporating appropriate setbacks, stepped massing and separation between buildings to manage scale, reduce perceived bulk and retain visual permeability

- The design of the proposed scheme is sensitive to the characteristics of the Gordon Park Estate, McIntosh & Ansell Conservation Area (C22) and the extant structures located on the subject lot. Note however that the bulk of the development would be located outside the HCA, with only its north corner extending into the edge of the HCA. The form, massing and materiality of the proposal is informed by the local visual context of the site's intersection location and its sloping topography, additionally the proposal respects the established setback pattern of the McIntosh streetscape.
- The subject site benefits from being a deep block extending south from McIntosh Street, meaning that the most visually impactful part of the development is confined to the shorter boundary of the site (i.e. the north boundary to McIntosh Street). Buildings B and C will be more recessive when viewed in the context of the street.
- The proposal has been developed with key design principles including a solid podium, glazing set deep back behind the line of the façade and substantial vegetation to ensure that its impacts on any adjacent existing property is minimised.
- The State listed heritage item to the west would be separated from the proposed development by the property at 19 McIntosh Street which is outside the subject site and is not identified to be of significance. The proposed development incorporates a podium, massing and materiality that mitigates visual impact on its surrounding however, the site location has the additional benefit of being physically separate from the heritage listed item.
- Eryldene is located towards the centre of its lot and is surrounded by a significant garden. The vegetation within and in front of the heritage listed site already largely screens views towards the subject site. The proposal conserves the setting of the State-listed heritage item Eryldene by maintaining visual separation, protecting important garden views and ensuring the development is read against a backdrop of sky and vegetation rather than as a continuous built form. The additional impact on views, in terms of the visibility of the new development behind (from the southeast) of Eryldene, is minor. There would be sufficient buffer around Eryldene to appreciate it in isolation.
- Overshadowing impacts to the Eryldene gardens are limited in extent and duration, occurring only in the early morning during winter and affecting a small portion of the eastern boundary, with no adverse impact on the viability or sustainability of the internationally significant camellia collection. Hydrology, groundwater and overland flow assessments confirm that the development will not adversely affect drainage patterns, soil conditions or water availability within the Eryldene gardens or surrounding heritage areas.
- A considered approach to vegetation will be included within the scheme to retain street trees where possible and respect the character of the Heritage Conservation Area's streetscape. Large mature tree plantings along McIntosh Street and Werona Avenue will be prioritised to create continuity with the character of surrounding streetscape and to maintain the character of views towards Eryldene. Refer to section Visual Context in Section 5.
- The material palette and façade articulation respond sympathetically to the surrounding heritage context, using predominantly warm, earthy brick tones, timber elements and recessive finishes to ensure the development sits comfortably within its landscaped setting.

Recommendations/Mitigation Measures

- Appropriate vibration management measures are required to be documented in the Construction Management Plan prior to the issue of a Construction Certificate (CC) to mitigate potential dilapidation impacts on nearby significant items.

1 Introduction

1.1 Background & Purpose

Urbis has been engaged by CPDM Pty Ltd on behalf of Werona Ave Residence Holding Pty Ltd to prepare the following Heritage Impact Statement (HIS) to accompany a State Significant Development Application (SSDA – 83478456) for updated proposed works to the properties located at 21-23 McIntosh Street & 55 Werona Avenue, Gordon (hereafter referred to as the ‘subject site’).

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The subject site is not listed as a heritage item, but it is partially in a Heritage Conservation Area (HCA) under the *Ku-ring-gai Local Environmental Plan* (KLEP) 2015. 25 McIntosh Street Gordon, at the eastern end of the subject site is located within the Gordon Estate, McIntosh and Ansell Conservation Area (C15), under part 2 of Schedule 5 of the KLEP 2015.

The subject site is also in the vicinity and visual catchment of several items and HCAs listed under Schedule 5 of the KLEP 2015 and one item listed on both the KLEP 2015 and the State Heritage Register (SHR).

The proposal involves the demolition of the existing low-density residential buildings on the subject site and the construction three residential flat buildings with in-fill affordable housing. The new residential buildings would be 8-storeys (including roof level) with two levels of basement carparking, and the development would also include amenities and landscaping. Further details of the proposed works are included in Section 5.

This HIS has been prepared to determine the potential heritage impacts of the development on the heritage significance of the HCA and the heritage items in the vicinity, including State heritage item ‘Eryldene’ (SHR00019). A detailed impact assessment of the proposed works has been undertaken in Section 6 of this report.

1.2 Methodology

This HIS supersedes the HIS prepared by Urbis and submitted with the original SSDA application in May 2026. This HIS addresses the amended scheme that was development in response to the submissions from the Department of Planning, Housing and Infrastructure (DPHI), Department of Climate Change, Energy, the Environment and Water (DCCEEW) – Heritage Council of NSW, and Ku-ring-gai Council, and peer review comments received from NBRIS (7 May 2026). An outline of the amendments made to the scheme and how each agency comment has been addressed is provided in **Appendix A**.

This HIS has been prepared in accordance with the Heritage NSW guidelines 'Assessing Heritage Significance', and 'Statements of Heritage Impact'. The philosophy and process adopted is that guided by The Burra Charter: the Australia ICOMOS Charter for Places of Cultural Significance, 2013.

Site constraints, opportunities and impacts have been considered with reference to the relevant controls and provisions contained within the Ku-ring-gai Local Environmental Plan 2015 (Ku-ring-gai LEP) and the Ku-ring-gai Development Control Plan 2024 (Ku-ring-gai DCP). This HIS is limited to the assessment of built heritage impacts of the proposal. It is beyond the scope of this report to assess the archaeological potential of the subject site or assess any potential archaeological impacts as a result of the proposal.

1.3 Author Identification

The following report has been prepared by Lisa Flemwell (Consultant). Alexandria Cornish (Director) has reviewed and endorsed its content.

Unless otherwise stated, all drawings, illustrations and photographs are the work of Urbis.

2 Site Description

2.1 Site Location

The subject site is located at 21, 23 and 25 McIntosh Street & 55 Werona Avenue within the Local Government Area (LGA) of Ku-ring-gai. The subject site is legally described as:

- Lot A DP339345 – 21 McIntosh Street;
- Lot 5 on DP651556 – 23 McIntosh Street;
- Lot 1 on DP167505 – 25 McIntosh Street; and
- Lot 11 on DP1078667 – 55 Werona Avenue.

The site is situated on Darramuragal or Durug land.

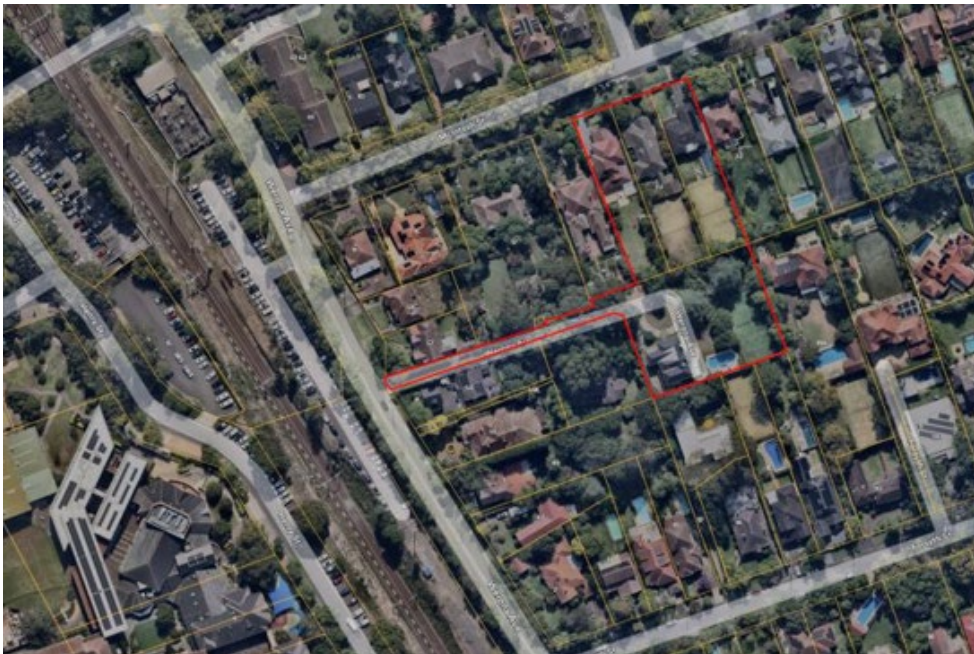


Figure 1 Location map showing the subject site outlined in red.

Source: Nearmap, 2025.

2.2 Setting, Visual Context and Sensitive Interfaces

The subject site is located partly within, and directly adjacent to, the Gordon Park Estate, McIntosh and Ansell Heritage Conservation Area (C22), and is in the immediate vicinity of the Gordon Park Conservation Area (C17). The site is also located directly east of the State-listed heritage item Eryldene (17 McIntosh Street) and in proximity to additional heritage items along McIntosh Street, Werona Avenue and Forsyth Street. This section outlines the existing heritage interfaces and the nature of the site's relationship with these heritage elements.

The subject site comprises a deep allotment extending south from McIntosh Street to Werona Avenue. The primary streetscape interface occurs along the northern boundary to McIntosh Street, where the site has a relatively narrow frontage in comparison to its depth. Existing development along McIntosh Street is characterised by detached dwellings set within established gardens, with mature street trees and private vegetation forming a strong visual buffer between built form and the public domain. These landscape elements shape the streetscape character and partially limit views into the subject site from the street.

The northern portion of the site includes No. 25 McIntosh Street, which is located within the Heritage Conservation Area but is identified by Council as a neutral building. The remaining properties within the subject site are located outside the HCA. Due to extensive alterations to the existing dwellings and the presence of mature vegetation, the existing buildings on the site make a limited contribution to the heritage streetscape character of McIntosh Street and the surrounding conservation areas.

The most sensitive heritage interface occurs along the western boundary of the subject site with the State-listed heritage item Eryldene. Eryldene is located centrally within its allotment and is surrounded by an expansive and mature garden setting, which includes significant canopy trees, hedges and specimen plantings. This vegetation provides substantial visual screening between the subject site and Eryldene, resulting in a filtered and often obscured visual relationship. Views towards the subject site from within the Eryldene gardens are largely screened, with only partial and distant glimpses available through breaks in the canopy. This is partly due to the existing nature of development on the subject site (i.e. a larger building such as that proposed would be less screened).

From the public domain, Eryldene is primarily experienced in isolation, framed by its garden setting rather than in direct visual association with surrounding development. The existing buildings within the subject site are not readily visible from key publicly accessible areas within Eryldene or from McIntosh Street in the same visual context.

The eastern and southern portions of the subject site adjoin established low-density residential development, including properties within the Gordon Park Conservation Area. Similar to McIntosh Street, these areas are characterised by detached dwellings within landscaped gardens, with mature vegetation and boundary planting limiting intervisibility between properties. Existing development on the subject site is largely screened from these adjoining areas and does not currently form a prominent backdrop or defining element within the conservation area.

While the existing visual relationship between the subject site and surrounding heritage items and conservation areas is limited, the proposed development will introduce a larger and more consolidated built form than the existing low-scale dwellings. Accordingly, the following heritage interface matters warrant consideration and are addressed in the impact assessment within this report:

- The potential for the development to form a new built backdrop when viewed from McIntosh Street and from within nearby Heritage Conservation Areas.
- The interface between the western extent of the development and the setting, views and garden context of the State-listed heritage item Eryldene.
- The relationship between the proposed built form and the character, setting and views of the Gordon Park and Gordon Park Estate, McIntosh and Ansell Heritage Conservation Areas as the area transitions to higher density under the TOD planning framework.

Sensitive interfaces include the following:

- The interface between the western façades and massing of Buildings A and B and the Eryldene gardens, particularly at upper levels where built form has the potential to be visible above existing vegetation.
- The presentation of the northern façade of the development to McIntosh Street, where the site is partially located within the Heritage Conservation Area and forms part of the primary public streetscape.



Picture 1 Streetscape of McIntosh Street.

Source: Urbis, 2025.



Picture 2 McIntosh Street, place within the Gordon Park Conservation Area.

Source: Urbis, 2025.



Picture 3 McIntosh Street as seen from outside Eryldene.

Source: Urbis, 2025.



Picture 4 Facing west, showing the McIntosh streetscape of mature trees.

Source: Urbis, 2025.

2.3 Subject Site Description

The subject at 21,23 and 25 McIntosh Street and 55 Werona Avenue, is an irregularly shaped lot with primary access from McIntosh Street, and 55 Werona Avenue accessible via a long narrow driveway off Werona Avenue. 21-25 McIntosh Street are all regular rectangular lots with street frontage facing McIntosh Street. 55 Werona Avenue is a large square lot on an east-west axis, not visible from Werona Avenue.



Figure 2 Aerial diagram showing the subject site outlined in red.

Source: SIX Maps, 2025.

2.3.1 21 McIntosh Street

21 McIntosh Street is a two-storey house with a render finish, with rusticated plinths on the northern elevation. The house may have some early forms (as outlined in the history below in this report) however its predominant character when viewed from the street is contemporary. The northern elevation of the house has a garage extension with a gable roof that was completed in 2004-2005. The core of the house has a hipped roof with extensions over the ground level to the northern and southern elevations. The roof material is red terracotta tile. The house is accessed via a paved driveway from McIntosh Street, with a metal sliding gate.

From McIntosh Street the house is screened by a shoulder high concrete fence with capped pillars that frame the driveway. The front yard is dominated by mature and dense vegetation that also screens the house from the street level.



Picture 5 21 McIntosh as seen from the street.

Source: Urbis, 2025.



Picture 6 View of the concrete fence of 21 McIntosh Street. Note the dense vegetation.

Source: Urbis, 2025.



Picture 7 Facing west, view of the concrete fence of 21 McIntosh Street. Note the vegetation behind and in front of the fence.

Source: Urbis, 2025.



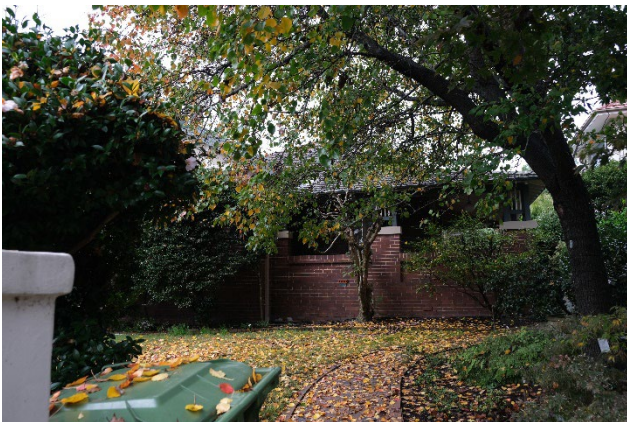
Picture 8 View of 21 McIntosh Street as seen from the opposite side of McIntosh Street.

Source: Urbis, 2025.

2.3.2 23 McIntosh Street

23 McIntosh Street is a single storey brick house of an interwar California bungalow architectural style. The house has a hipped roof and gable street facing end that has been infilled, finished in terracotta tiles. The house has an extension to the rear elevation. Externally the house has tapered pylons with slab cappings and grouped posts.

The majority of the house is screened from the street by dense and mature vegetation. The house is setback from the street level and screened from the street by a high fence that is concrete pillars with decorative metal fencing in between the pillars.



Picture 9 View of the northern elevation of 23 McIntosh, showing interwar features.

Source: Urbis, 2025.



Picture 10 Fence and infilled street facing gable end.

Source: Urbis, 2025.



Picture 11 Fence for 23 McIntosh seen from the street. Note the large tree growing within the property.

Source: Urbis, 2025.



Picture 12 25 and 23 McIntosh separated via the driveway to 23 McIntosh.

Source: Urbis, 2025.

2.3.3 25 McIntosh Street

25 McIntosh Street is a modern two-storey house, accessed via a paved driveway along McIntosh Street, that leads to a garage with roller door. The ground level of the house is obscured from the street view by a high fence that is a mix of concrete block pylons, with lamps on top, and metal or timber screening. The house is finished is a render, with modern sliding windows on the first floor. The hipped roof is a modern terracotta dark tile materiality, the awning roof is finished in the same materiality.

Internally the house has polished timber floorboards, modern sliding windows, modern light fixtures, and curtain hangings, doors and door furniture.



Picture 13 25 McIntosh Street, showing the high fence and modern features.

Source: Urbis, 2025.



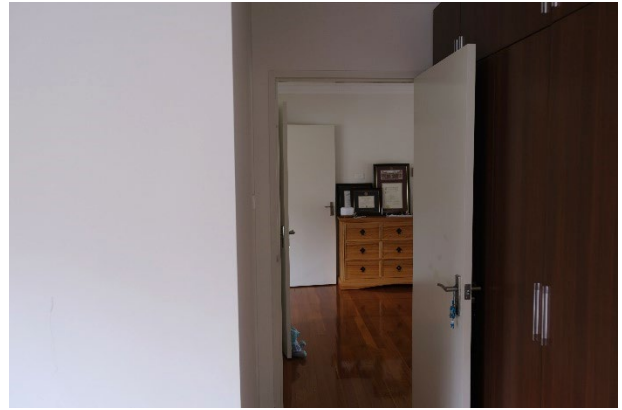
Picture 14 25 McIntosh (left hand side) as seen from Rosedale Road.

Source: Urbis, 2025.



Picture 15 Internal view of 25 McIntosh Street, showing modern sliding windows overlooking McIntosh Street.

Source: Urbis, 2025.



Picture 16 Interior of 25 McIntosh Street

Source: Urbis, 2025.

2.3.4 55 Werona Avenue

55 Werona Avenue is accessed via Werona Avenue via a long narrow driveway obscured from the neighbouring dwellings by high and mature hedges, halfway down the length of the driveway a metal gate supported by concrete pylons prevents people from accessing the residence.

The house is a two-storey house in an inter-war mediterranean style, with a formal entrance treatment, window shutters, balcony with wrought iron detailing balustrades. The house is completed in a render, with modern terracotta tile roof, high vents, French doors on the first floor with door shutters.



Picture 17 Long narrow driveway of 55 Werona Avenue.

Source: Urbis, 2025.



Picture 18 Gated entrance to 55 Werona Avenue.

Source: Urbis, 2025.



Picture 19 External view of 55 Werona Avenue showing the north-west corner.

Source: Urbis, 2025.



Picture 20 Views of the house completely obscured by dense vegetation.

Source: Urbis, 2025.

3 Historical Overview

3.1 Area History

The following area history for the suburb of Gordon has been excerpted from the Dictionary of Sydney:

Gordon is a suburb of Ku-ring-gai, the traditional land of the Aboriginal people who had lived here for thousands of years. Gordon lies in the centre of Ku-ring-gai Municipality and was the earliest settlement in the area. It is 15 kilometres north of Sydney and 379 hectares in area. Formerly known as part of Lane Cove, the name given indiscriminately to the area, the parish of Gordon was gazetted in 1835.

The name Gordon, adopted for the suburb in 1879, is derived from Gordondale Estate, the estate owned by Robert McIntosh and honours Sir James Willoughby Gordon, Quartermaster-General of the Horse Guards in London in the 1830s.

3.1.1 Early Development

A school was built in 1816 by Governor Macquarie on land that is now the grounds of St John's Anglican Church on the Pacific Highway at Gordon. The first land grants were in 1821. Land was used mainly for timber-getting until the 1840s. After 1840, with the clearing of the valuable timber, orchards and farms were established. In the early days of settlement around the Gordon area timber-getters and orchardists built rough slab and bark huts. The area was notorious for smuggling, sly grog and fighting, Geary's Gang of bushrangers were known to be based in the bush and caves near Gordon Creek.

Gordon had the community's first schools, churches and stores. By 1860 there was a post office known as Lane Cove Post Office. It operated from a private residence called Iolanthe, constructed and occupied by the Edwards family until 1928. Miss Elizabeth (Elisa) Edwards served as postmistress until 1894. Iolanthe was purchased by Ravenswood Girls School in 1955 and has been used as a caretaker's residence. In January 1901 the first Headmistress, Miss Mabel Fidler, commenced classes in a schoolroom erected on the block adjacent to her home, Ravenswood, in Henry Street, Gordon.

Gordon Public School constructed in 1875, is the earliest public building in Gordon. It closed in 1989 and is now the home of the local historical society. The main branch of Ku-ring-gai Library and the police station adjoin the old school building. There are two public schools in Gordon: East Gordon Public School on Rosedale Road and West Gordon Public School on Ryde Road.

3.1.2 Rail and Subdivision

The coming of the railway in the 1890s increased land values. Gordon Station was opened in 1890 and is now listed on the State Heritage Register. Early development in the shire followed the railway lines and ridge tops. The first subdivisions occurred between 1879 and 1900 when paddocks and orchards were sold to real estate agents. The size of the blocks varied. Some were small, meant for cottages or shops. In the Gordon Heights estates, small timber houses were built for tradesmen while sites in other areas were up to two acres (8093 square metres). These usually had fine vistas of the surrounding countryside side with room for tennis courts and stables. The high elevation and clean air attracted business men who wanted family homes in a rural setting with easy access to the city.

The first meeting of Ku-ring-gai Shire Council on 8 December 1906 was held in the Parish Hall of St John's Anglican Church, Gordon. In 1911 a small Shire Council building was built on what is now the Pacific Highway at Gordon with the result that Gordon has become the administrative centre of Ku-ring-gai. A council works department was established in 1924 and in 1928 the original section of the present council chambers opened.

The community's varied recreational interests at this time are suggested by the opening of the Empire Picture Theatre in 1924 and local involvement in the establishment of the Lane Cove National Park, particularly that of Christopher Bowes Thistlethwayte, who was Shire President in the second half of the 1920s.

In the late 1920s, as new subdivisions were made and the population increased, St Johns Avenue, earlier Fox Street, became the first paved road in the municipality. Excellent examples of styles popular during the Federation and interwar periods (single-storey and 1920s and 1930s bungalows) characterise the streetscapes of Gordon and can best be seen in St Johns Avenue and Spencer and Cecil streets. Housing in the area consists predominantly of houses on medium to large lots. Gordon has two houses listed on the State Heritage Register: Erydene in the Colonial Revival style and the Arts and Crafts style Tulkiyan.

Development was rapid in the 1950s, with the opening in 1959 of the Farmer & Company store, which later became Myer department store. In the 1960s Gordon was a bustling centre. The Council building had further extensions and their shops were redeveloped along the Pacific Highway. However, by the 1970s, nearby St Ives was supplanting Gordon as the main business centre in the district.

3.1.3 Twenty first Century Changes

A push for dual-occupancy dwellings in more recent years has led to some higher density housing being constructed around the commercial centre and near the railway station. In 2006, Ku-ring-gai Council submitted a Draft Local Environmental Plan and Draft Ku-ring-gai Development Control Plan for Gordon Town Centre. The plans were prepared in response to a direction from the Minister for Planning to provide more housing in and around key commercial centres and to help increase retail and commercial development to cater for the needs of the local community.

Gordon is home to Sydney's largest flying fox colony and the Council in conjunction with the Heritage Council of NSW acquired land in Gordon in 1986 to preserve the existing colony of grey-headed flying foxes. Recently Ku-ring-gai Council acquired a portion of land adjoining Flying Fox Reserve to further safeguard the flying foxes, which are now listed as a threatened species.

Gordon has a number of small parks and reserves including the Annie Forsyth Wyatt garden which contains a memorial to the Tree Lover's Civic League. The garden itself is a monument to Wyatt as the founder of the National Trust in Australia.

3.2 Subject Site History

3.2.1 Gordon Park Estate, McIntosh and Ansell Conservation Area

Michael Ansell arrived in Sydney Cove in 1802 having been sentenced to seven years transportation. By 1807 Ansell was a free man and appeared to be living in the Ku-ring-gai area prior to his first land grant in 1823. In 1819, he married Elizabeth Hutchinson at St Phillips Church of England, Sydney. Ansell was 40 years old; Elizabeth was 35. On 30 June 1823 Sir Thomas Brisbane granted Ansell 40 acres in the district of Hunters Hill (known today as Gordon). The grant was conditional on Ansell clearing and cultivating twelve acres within five years. The 40-acre grant was Portion 423 that now takes in parts of Nelson, McIntosh, Rosedale, Werona and Henry Streets, and incorporates the entire Gordon Park Estate McIntosh/Ansell Grant Conservation Area. In 1842 Michael Ansell sold the land to William Butler, with a mortgage to Samuel Lyons. When Butler defaulted on the payment, Lyons exercised his right to sell the land in 1843, at which time it was purchased at public auction by Robert McIntosh.¹

Robert McIntosh arrived in Australia from England with his wife, Ellen and their two children in 1814. Their oldest child Robert was then 18 years old and his brother John was 16. Five further children were born in Australia. In 1834 Robert McIntosh (the second), through a process of Lease and Release, purchased 100 acres of land from Benjamin Clayton at Gordon for the sum of £50. McIntosh sold the land to William Pymble in 1836 but bought the land back in 1837 for the consideration of £100. In 1843 Robert McIntosh

¹ NSW State Heritage Inventory (SHI), 2024, Gordon Park Estate, McIntosh and Ansell Conservation Area (C15), <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?id=1882692>.

bought the adjoining 40-acre Ansell grant from Samuel Lyons. The land was located on the eastern side of the Lane Cove Road (Pacific Highway) opposite St John's Church. It extended away from the road and provided the site for Robert's orchard and large weatherboard house.

In 1895, the land grant was subdivided under DP 3267 into five sections with a portion fronting Lane Cove Road. The railway corridor cut through the subdivision and McIntosh Street was formed to service the lower third of the land. Advertised by Richardson and Wrench as Gordon Park Subdivision, the auction sale was held on the grounds on Saturday 29 February 1896. (*The Historian*, 2007, Volume 36.1, pp. 92-94).

The allotments of the Gordon Park Estate were villa size at just under an acre each situated between Nelson Street and a line south of McIntosh Street. Whilst two of the allotments at the eastern end of Nelson Street remain intact, many were later subdivided, typically split down the middle to create two narrower lots still facing either Nelson or McIntosh Streets.

As a result of the later subdivision, the area contains some Interwar housing and some late twentieth century housing.²

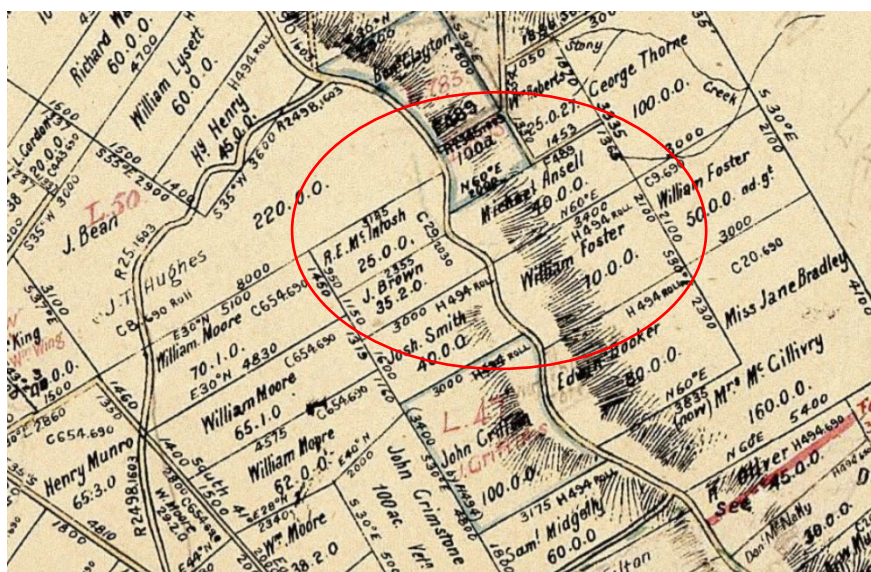


Figure 3 Extract of Parish of Gordon map 1883 showing Lots owned by Ansell and McIntosh (outlined in red).

Source: NSW Historical Land Register Viewer, <https://hlrv.nswlrs.com.au/>.

3.2.2 Gordon Park Conservation Area

The conservation area is located within the 1823 land grant to Michael Ansell of 40 acres. Ansell arrived in Sydney Cove in 1802 having been sentenced to seven years transportation. By 1807 Ansell was a free man and appeared to be living in the Ku-ring-gai area prior to his first land grant in 1823. In 1819 he married Elizabeth Hutchinson at St Phillips Church of England, Sydney. Ansell was 40 years old; Elizabeth was 35. On 30 June 1823 Sir Thomas Brisbane granted Ansell 40 acres in the district of Hunters Hill (known today as Gordon). The grant was conditional on Ansell clearing and cultivating twelve acres within five years. The 40-acre grant was Portion 423 that now takes in parts of Nelson, McIntosh, Rosedale, Werona and Henry Streets, and incorporates the entire Gordon Park Conservation Area.

² Ibid.

In 1842 Michael Ansell sold the land to William Butler, with a mortgage to Samuel Lyons. When Butler defaulted on the payment, Lyons exercised his right to sell the land in 1843, at which time it was purchased at public auction by Robert McIntosh.

In 1852 McIntosh transferred the land to his son George for the sum of £330 (Book 22 No. 543). The land was subsequently transferred to George's mother Hannah McIntosh in 1860. Following the resumption a portion of the land for the construction of the North Shore rail line, a small section of McIntosh's land was transferred to Eliza Edwards. Nos. 57 and 59 Werona Avenue are located within Eliza Edward's parcel of land (Primary App. 10336).

Subdivision of the remainder of McIntosh's land took place in 1895, creating DP 3267. Nos. 11,15 and 17 are located within Section 3 of the subdivision. "Eryldene", No. 17 McIntosh Street, is located on land purchased by Professor Eben Gowrie (EB) Waterhouse in 1913. Waterhouse was a linguist and camellia expert who was living in France when he met Scottish born Janet Frew Kelly, who he married in 1912. Frew's home in Kilmarnock, Scotland was named "Eryldene". Returning to Sydney, Waterhouse taught at Teachers' College, Sydney. Waterhouse was later appointed associate professor of German and comparative literature at the University of Sydney and became professor of German in 1938-45 (The Historian, 2001, pp. 1-3).

The size of land of the site the Waterhouse and his wife purchased in Gordon allowed for a generously sized house and garden to be developed. They commissioned architect William Hardy Wilson to design a house that they named "Eryldene". Over many years Waterhouse enhanced the buildings with a beautiful and complex garden, making extensive use of camellias and azaleas, with other trees and shrubs of pleasing forms. In 1939 he established Camellia Grove Nursery in St Ives and generated a renewed world-wide interest in the flowering plant.

Waterhouse's success with the garden at "Eryldene" led him to influence garden design within the university; he is responsible for the layout of the Quadrangle and the vice-chancellor's courtyard, as well as other areas throughout the university and the adjoining Royal Prince Alfred Hospital. "Eryldene" is listed on the NSW State Heritage Register.³

3.2.3 21 McIntosh Street

In 1891 Hannah McIntosh a spinster from North Shore, was the proprietor of 'eight acres, one rood and five and one quarter perches on the north eastern side of Lane Cove Road at the south western corner of land of Robert E McIntosh and bounded thence on the north west by that land bearing north easterly five chains seventy six links to land of the Railway Commissioners of New South Wales..⁴ The land owned by Hannah McIntosh was listed as being 'vacant', presumably this meant that there was no buildings on the land at the time (Figure 4).

In 1901 a title transfer of 2 roods and 29 ¼ perches was transferred from Hannah McIntosh to a Sydney School Master Arthur Henry Shakespeare Lucas. The land listed as being Lot 4 of Section 3 part of the forty acres originally owned by Michael Ansell (Figure 5). By 1917 Hannah McIntosh's estate had been subdivided into smaller parcels (Figure 6 and Figure 7).

The Lot A DP339345 was subdivided from Lot 4, Section 3 in 1939. Marie Gertrud Pribil wife of Karl Pribil of Vaucluse purchased Lot A (21 McIntosh); the property appears to have stayed in the Pribil family until 1972

³ NSW SHI, 2024, Gordon Park Conservation Area C17, <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=1882691>.

⁴ NSW Historical Land Register Viewer, Vol.1006. Fol. 21. <https://hlrv.nswlrs.com.au/>.

(see Table 1 below). The house remained substantially intact until 2004–2005 when extensions were added the northern and southern elevations of the house. The house was sold in 1998 and again in 2012.⁵

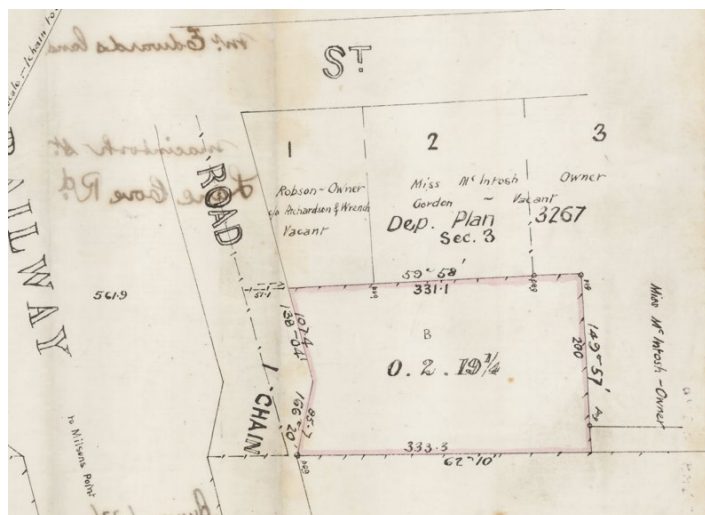


Figure 4 Location of the lot of land owned by Hannah McIntosh.

Source: NSWSL, Z/SP/G8, Copy identifier FL8989081 (web).

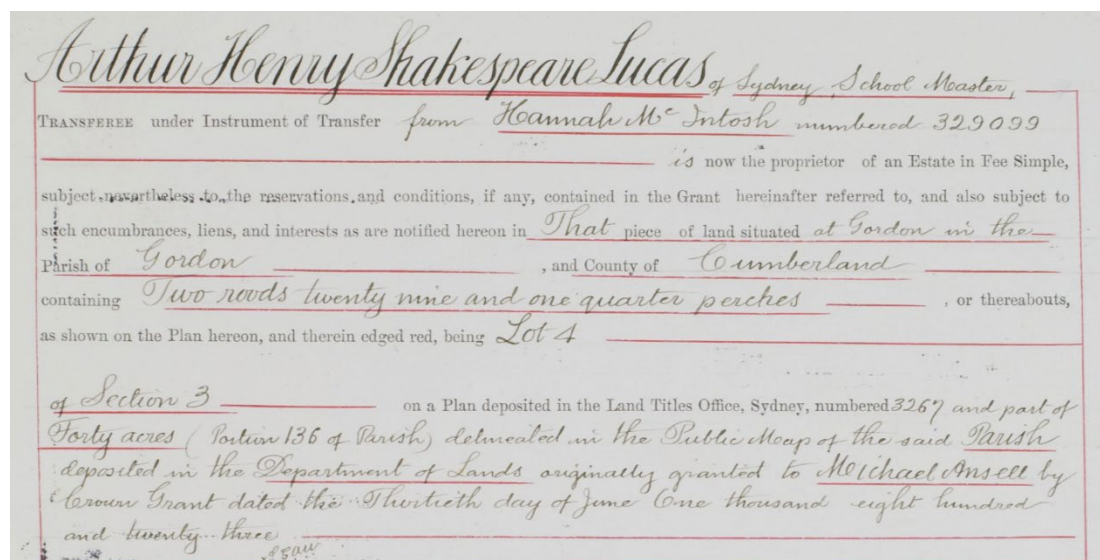


Figure 5 Extract of the Certificate of Title dated 1901, detailing the lot information.

Source: NSW Historical Land Register Viewer, Vol.1372. Fol.72.

⁵ Property, 2025, 21 McIntosh Street, Gordon, <https://www.property.com.au/nsw/gordon-2072/mcintosh-st/21-pid-1107335/>.

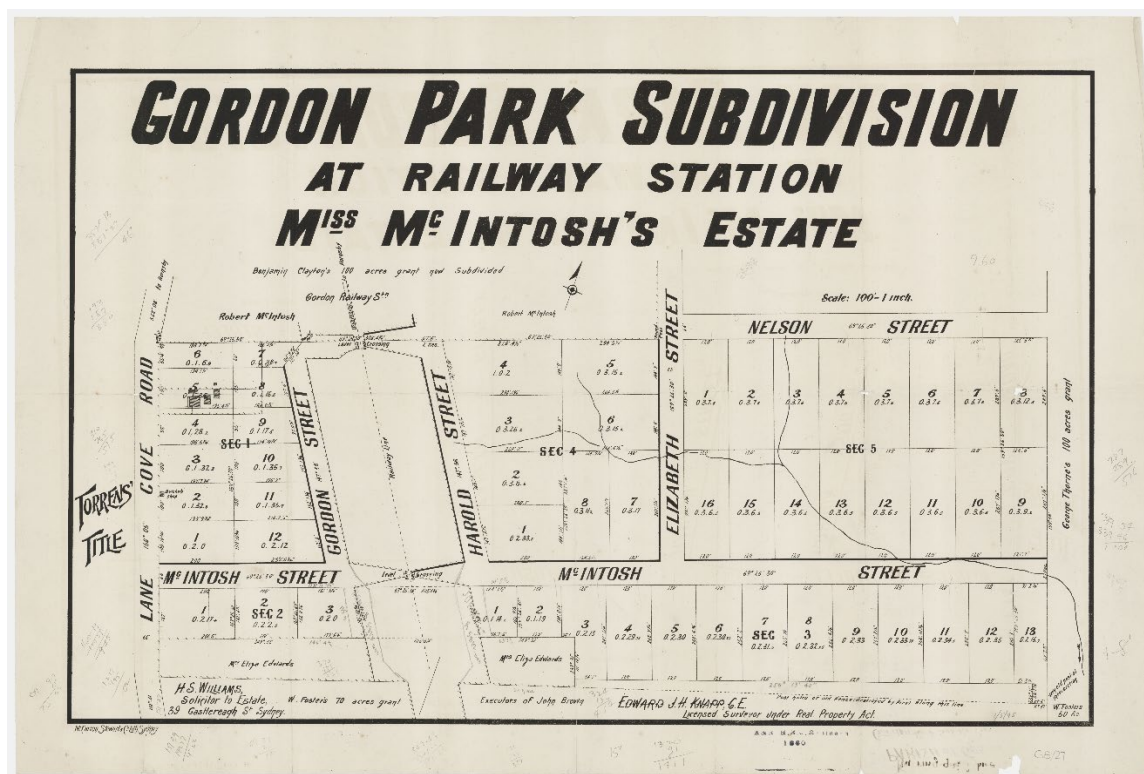


Figure 6 Map showing the lots available as part of the subdivision of Hannah McIntosh's Estate.

Source: NSWSL, Z/SP/G8/27, preservation copy identifier FL8987701 (web).



Figure 7 Extract of 1917 Parish of Gordon map showing the subdivided lots of Ansell's 40 acres.

Source: NSW Historical Land Register Viewer, parish of Gordon sheet 2, edition 7.

3.2.3.1 Property Ownership History

The relevant post European settlement property owners as identified through historical research are outlined below for reference.

Year/Date	Owner	Source
1891	Hannah McIntosh	Vol.1006. Fol.21.

1901	Arthur Henry Shakespeare Lucas, school master from Sydney	Vol. 1374. Fol. 72.
1903 – 1908	Laura Emma Elizabeth Stack, wife of George Stack of Sydney, Esquire. Paid mortgage to Arthur Lucas.	Vol. 1374. Fol. 72.
1924	Herbert Stanley Lettmann a School master from Sydney	Vol. 1374. Fol. 72.
1939	Marie Gertrud Pribil wife of Karl Pribil of Vacluse	Vol. 5023. Fol 78.
1972	Bendemer Trading Company Pty Ltd	Vol. 5023. Fol 78.
1985	Ronald Dennis Buchanan and Della Agnes Buchanan as joint tenants	Vol. 5023. Fol 78.

3.2.3.2 Construction Date

Based on the historical research outlined herein, we have identified the construction date pre-1943. This is substantiated by the historical aerals and Sands owner register. In 1930 a large rectangular structure is discernible, however the image is of low resolution cannot be determined if the structure is a dwelling.

The Sands Sydney, Suburban and Country Commercial Directory, 1931 and 1932 confirms that an occupied dwelling was not registered in 1931.⁶ Historical aerial from 1943 confirms that the house was built sometime before that date. However, due to the significant alterations and additions to the house the present day house functionally dates from 2005.

Date	Image	Commentary
1930		The Imagery is of low resolution, however a rectangular structure at the front of the lot can be seen.

⁶ City of Sydney Archives & History Resources, Sands Sydney, Suburban and Country Commercial Directory, 1931, ID A-001136228.

<https://archives.cityofsydney.nsw.gov.au/nodes/view/1898928?type=all&lsk=62336d9d666fb6703441e6824b796699>.

1943



A low-density residential house has been constructed on the Lot at this time.

A large structure to the rear of the house that encompasses the majority of the rear yard.

A smaller structure is visible immediately to the south of the house.

1965



No changes to the scale or bulk of the house at this time.

Large structure in the rear yard has been removed by this time, replaced by grass and vegetation.

1994



No changes to the scale or bulk of the house at this time. There is also no changes to property at this time.

Vegetation and trees on the Lot are more mature and denser by this time.

2005



To the northern and southern elevations of the house extensions have started to be constructed. The extension have changed the bulk of the house.

2009



The extensions that were added to the northern and southern elevations of the house have been completed by this time.

A paved terrace and matching driveway have been added to the property.

3.2.4 23 McIntosh Street

The 1902 Land Title confirms that the 23 McIntosh was originally apart of Lot 5 Section 3 owned Arthur Henry Shakespeare Lucas and Charlotte Lucas who purchased the lot that was previously part of Hannah McIntosh's estate. The Lot originally started as two roods and thirty perches, however by 1920s the Lot was reduced to one rood and fifteen perches.

Title transfer stamps on the 1902 Land Title for Charlotte Lucas shows that a transfer was made from Arthur Henry Shakespeare Lucas to Robert Wilkinson on 12 December 1921 (Figure 8). The 1931 Sands post office directory confirms that the property at 23 McIntosh Street occupied by Robert Wilkinson and Miss S.M. Wilkinson (Figure 9).

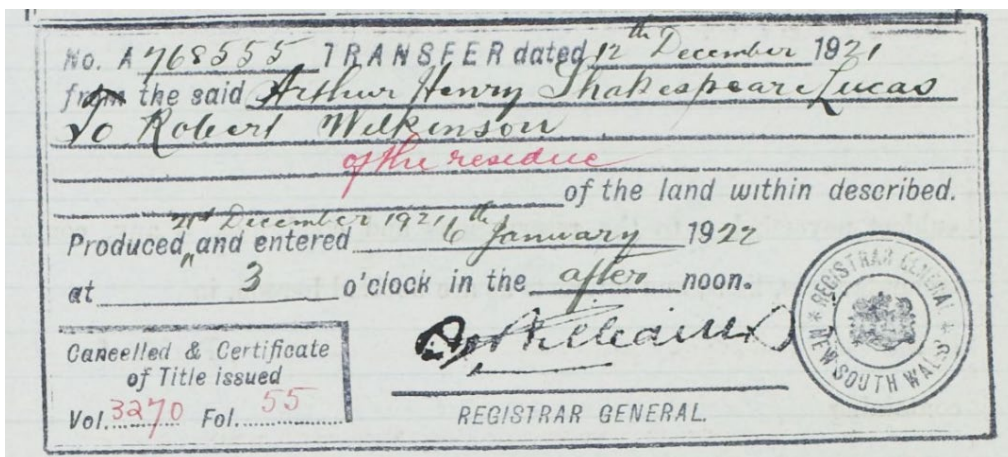


Figure 8 Extract of the 1902 Land Title showing the transfer of land to R. Wilkinson.

Source: NSW Historic Land Register, Vol.1582. Fol. 149.

McIntosh Street	
South side	
Off Lane Cove road	
1 Webb Joseph	17 Bell Arthur
9 Oahy William	19 Wilson I. S.
Henry st—Railway line—	21 Carter A.
Herona avenue	33 Hancock Alfred
11 Moss Edward A.	39 Holden Ben.
15 Hutterford F. K.	41 Morphet Fredk. W.
17 Waterhouse E. G.	43 Wallace F. S.
19 DeLionun Herbert S.	45 Howarth Milner
23 Wilkinson Robert	47 Williamson George
Wilkinson Miss S. M.,	51 Andrews William H.
massense	Margaret Street
25 Fuller Stanton	Clifford st to Bell st
Blackmore George S.	Matong Street
27 Gustafson O. W.	Nehan st to McIntosh st
31 Wright Miss F.	East side
33 Walker John	Stonphurat Flats—
35 Miller H. W.	2 Harris Castle
37 Fowler Mrs. K. A.	3 Henderson John
41 Cleburne John R.	4 Gibson Morris
43 Hanson Fredk.	West side
45 Titcher John H., J.P.	Ryan Mrs. P. V.
47 Fletcher Robt. H.	Cowan, housebuilding
49 Coombes Archie J.	Donaldson R. O., 'Talana'
51 Spence Gca. H.	Merriwa Street
53 Kingsland J. A.	South side
55 Searle Herbert W.	Off Lane Cove road
57 Scrimage Mrs. M. G.	2 Greenwood Edgar
Arthur street	4 Morris Valentine J.
Ellison A. O., solicitor	10 Stanley Wesley A.
77 Dwyer Alan Haywood	12 Ardill William
81 Durrant Mrs. L. M.	14 Mills Clement B.
	16 Caldwell Mrs. H. M.
	18 Noble Bruce P.
	22 Petersen Hans P.

Figure 9 Extract from Sands directory in 1931, noting a property at 23 McIntosh Street.

Source: City of Sydney Archives & History Resources, Sands Directory A-01136228.

3.2.4.1 Construction Date

The house was constructed on the site likely after the Lot 5 was subdivided, this is confirmed by the Post Office Directory, the historical aerial for the site confirms that a structure is visible on the lot in 1930, however the image is of low resolution, therefore not as clear as the 1943 aerial. Externally the house has not been altered as much as 21 and 25 McIntosh Street. The house has an extension added by 1982 to the south-west corner of the house and potentially a covered path that connects to a small structure in the rear yard of the house.



Figure 10 1930 historical aerial of 23 McIntosh Street (outlined in red).

Source: NSW Historical Imagery, CAC_07_1216.



Figure 11 1943 historical aerial of 23 McIntosh Street (outlined in red).

Source: NSW Historical Imagery, 2025.



Figure 12 1982 historical aerial of the 23 McIntosh Street, showing extension to the south-west and rear of the house.

Source: NSW Historical Imagery, 2025.



Figure 13 23 McIntosh Street as seen in 2025.

Source: Nearmap, 2025.

3.2.5 23 McIntosh Street

In 1902 25 McIntosh Street is listed as being Lot 5 of Section 3 containing 'two roods and thirty perches' (Figure 14). The lot was owned by Charlotte Lucas wife of Arthur Henry Shakespeare who purchased the land during the subdivision sale of Hannah McIntosh's estate.⁷

The Lot purchased by James Alexander Gilroy in 1920 was for 'part of Lot 5 of section 3 containing one rood fifteen perches'.⁸ Based on this information it shows that the original Lot 5 Section 3 had been subdivided, assuming to accommodate number 23 McIntosh.

The Sands Directory in 1931 lists Stanton Fuller and George S Blackmore as joint tenants at 25 McIntosh Street (Figure 9). However, in 1932–1933 Sands Directory lists a Miss N. Pryde at 25 McIntosh and a Miss Lucy Pryde at number 27 McIntosh. The land title was transferred in mid-1931 to Nancy Olive Pryde and Ethel May Pryde to spinsters from Gordon. Nancy appeared to live at the property even after the death of her sister in 1932, Nancy transferred the title to Edwin Ernest Pannell in 1951, made official in 1952.⁹

⁷ NSW Historical Land Register Viewer, Vol. 3097. Fol 65, dated 1920. <https://hlrv.nswlrs.com.au/>.

⁸ Ibid.

⁹ Ibid.

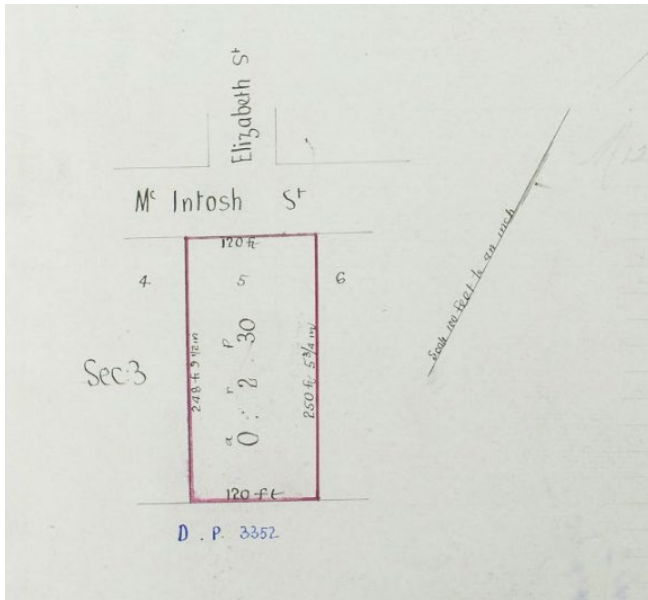


Figure 14 Plan of Lot 5 Section 3 owned by Charlotte Lucas in 1902.

Source: NSW Historic Land Register Viewer, Vol. 1582. Fol. 149.

Mudie Albert D.
McIntosh Street
South side
Off Lane Cove road
1 Sproule Thomas
9 Oxby William
Henry st—Railway line—
Herona avenue
11 Mosa Edward A.
16 Rutherford F. K.
17 Waterhouse E. G.
19 Dettmann Herbert S.
23 Wilkinann Robert
Wilkinson Miss S. M.,
manseura
25 Pryde Miss N.
27 Pryde Miss Lucy
28 Wilson —.

Figure 15 Extract from 1932–33 Sands Directory showing residents along McIntosh Street.

Source: City of Sydney Archives & History Resources, Sands Directory, A-01136227.

In 1952 Edwin Ernest Pannell held the title for Lot 5 of section 3 on DP no.3267, containing one rood and fifteen purchases, the land was previously part of the 40 acres owned by Michael Ansell in 1823. The title was transferred to John and Barbara Willis-Jones in 1958, who owned the property until the death of Barbara Willis-Jones in 1978. The land was transferred Robert Thomas Virgona after Barbara's death. More recent documented sales of the property occurred in 2001 and again in 2007.¹⁰

3.2.5.1 Property Ownership History

The relevant post European settlement property owners as identified through historical research are outlined below for reference.

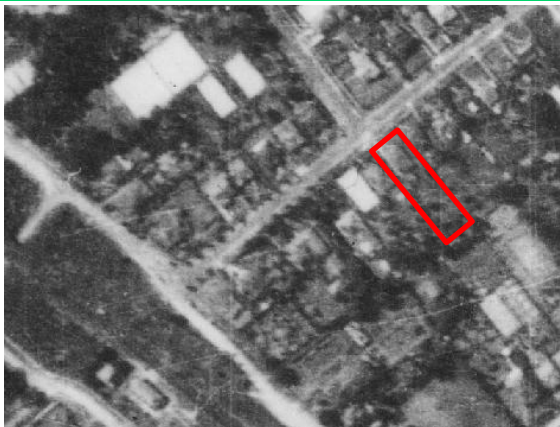
Year/Date	Owner	Source
1891	Hannah McIntosh	Vol.1006. Fol.21.

¹⁰ Realestate.com, 2008, 25 McIntosh Street, Gordon NSW, <https://www.realestate.com.au/property/25-mcintosh-st-gordon-nsw-2072/>.

1905	Charlotte Lucas wife of Arthur Henry Shakespeare Lucas	Vol. 1582. Fol. 149.
1920	James Alexander Gilroy	Vol.3097. Fol.65
1924	Vincent James Walker	Vol.3097. Fol.65
1931	Nancy Olive Pryde and Ethel May Pryde (spinsters)	Vol.3097. Fol.65
1952	Edwin Ernest Pannell	Vol. 6431. Fol. 231
1958	John Willis-Jones and Barbara Willis-Jones	Vol. 7508. Fol.247.
1978	Robert Thomas Virgona of Lindfield Dental Surgeon	Vol. 7508. Fol. 247.

3.2.5.2 Construction Date

Based on the historical research outlined herein, we have identified the construction date of 1930, however it is likely that this house was heavily altered/substantially demolished in 2009. This is substantiated by the historical aerals and Google Street View and represented in the table below.

Date	Image	Commentary
1930		The Imagery is of low resolution, however there is a rectangular structure on the Lot.
1943		A house was at 25 McIntosh was constructed by this time. A smaller structure is visible to the immediate south of the house.

1965



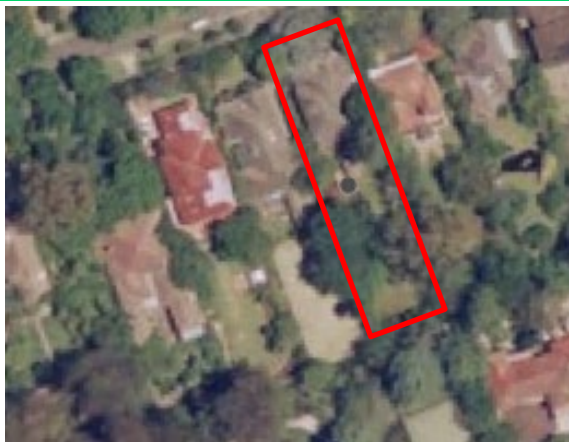
No changes to the form, bulk or scale of the house by this time.

1994



There appears to be no changes to the bulk and scale of the house by this time, however the vegetation around the house and on the lot has become more dense and blocks partial view of the house.

2005



No changes to the bulk and scale to the house, however a mature tree obscures a partial view of the south-east corner of the house.

2008



Primary façade of 25 McIntosh Street (Google Street View).

2009



By this time the house has changed in form, and the primary façade has been substantially altered since 2008 (Google Street View).

The bulk and scale of the house has changed from a single storey to a double storey. The roof form as also been altered.



3.2.6 55 Werona Avenue

Florence Lilian Edwards a Spinster from North Sydney, owned the parcel of land that contained 55 Werona Avenue. The land was listed as being two roods nineteen and one quarter perches, the lot was originally part of the 40 acres owned by Michael Ansell in 1823, and part of the 70 acres owned by William Foster in 1821.¹¹ In 1907 the lot of land of was transferred from Florence Edwards to William Joseph O'Brien, a dental surgeon from Sydney (Figure 16). In 1908 William O'Brien transferred the title to Partick Herbert O'Brien, who held the land until it was transferred to Eben Waterhouse in 1920.

In 1932 a portion of the lot owned by Eben Gowrie Waterhouse was sold to a Spinster from Gordon Miss Doris Adeline Selby (Figure 17). Doris Selb signed the deed in the presence of H.B. Selby, who owned property 'Marley' on Werona Avenue (Figure 18 – Figure 19). Waterhouse started to subdivide his land from 1932, with part of the land being transferred to Myrtle Govers in 1935, and another section to George Mercer Hall in 1936.

There is not a lot of historical information available for the property available between 1936 and 1993. The historical aerals indicate that a smaller structure existed on the lot in 1930, that had been extended and altered by 1943. The house had not been altered much over time, the last sales record for the place was recorded in 1993.¹² The roof materiality had been changed in 2021 to a more modern material.

¹¹ NSW Historical Land Register Viewer, Certificate of Title Vol.1751. No. 36.

¹² Realestate.com, 55 Werona Avenue, Gordon, <https://www.realestate.com.au/property/55-werona-ave-gordon-nsw-2072/>.

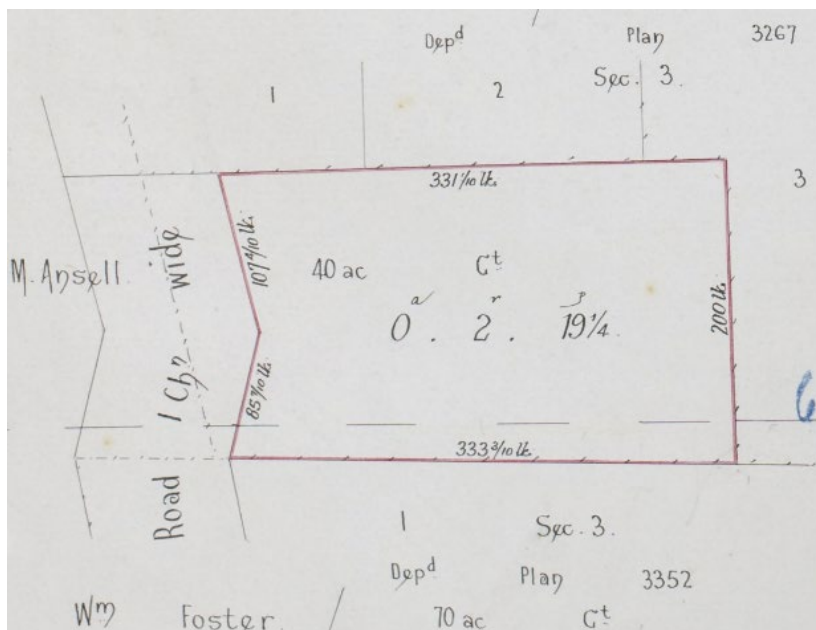


Figure 16 Extract of the land title search showing the extent of land owned by Florence Edwards.

Source: NSW Historical Land Register Viewer, Certificate of Title Vol.1237. No. 18.

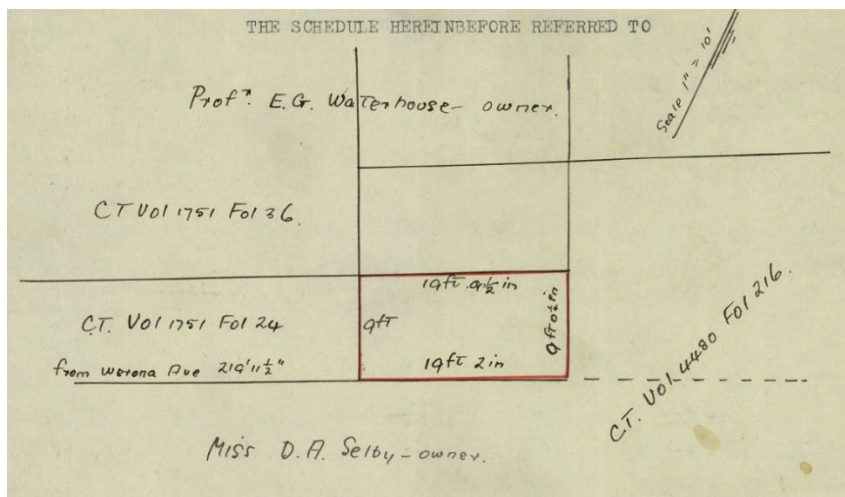


Figure 17 Extract from the land title search showing the lot of land purchased by Doris Selby.

Source: NSW Historic Land Register Viewer, BK 1811, no. 538.

Verona Avenue
 Park avenue to Cecil street
 East side
 Maueock Mrs. B.
 Kharloum avenue
 Herdson H. D., mtr. garage
 Whitehouse Mrs. A., refresh.
 rooms
 Robert street
 Gordon Theatres, Ltd.
 Whitehouse S. confetr
 Gordon Recreation Ground
 Marshall Mrs. I. M.
 Turner F. R., 'Vectis'
 McIntosh street
 Selby H. B., 'Marley'
 Hunt Mrs. M. J., 'Lenaker'
 Thomas street
 Elva avenue

Figure 18 Extract from Sands Directory showing H.B.Selby living in the area in 1932.

Source: City of Sydney Archives & History Resources, Sands Directory, A-01136227.

nt Selby F., 30 Margate st, Sna Sel
 y Selby O. J., 20 Gllgauder rd, N. Bondi
 d Selby Mrs. Gladys, 60 Macleay st
 Selby H. B., **Verona** avo, Gordon
 h Selby H. H., 10 Archer st, C'cord
 e- Selby H. R., 11 Laurel st, W'hby
 k' Selby Mrs. H. R., Raliway st, Holroyd
 Selby H., 28 Lane Cove rd, Ryde

Figure 19 Extract from Sands Directory showing H.B. Selby living at Werona Avenue in 1932.

Source: City of Sydney Archives & History Resources, Sands Directory, A-01136227.

No. C 353253 TRANSFER dated 10th July 1935
 from the said Elen George Waterhouse to
 Myrtle George of part
 of the land within described
 Produced 12th July 1935 and
 entered 23rd August 1935
 at 12 o'clock in the noon.
 As to land in this transfer
 this Certificate is cancelled
 and new Certificate issued
 Vol. 4708 Fol. 57
 REGISTRAR GENERAL
 (Seal of Registrar General, New South Wales)

No. C 418862 TRANSFER dated 13th March 1936
 from the said Elen George Waterhouse to
 George Mercer of part being the
 residue
 of the land within described
 Produced 13th March 1936 and
 entered 15th April 1936
 at 12 o'clock in the noon.
 As to land in this transfer
 this Certificate is cancelled
 and new Certificate issued
 Vol. 4757 Fol. 153
 REGISTRAR GENERAL
 (Seal of Registrar General, New South Wales)

Figure 20 Extract of the land title search showing the title transfer of 'part of' Waterhouse's land.

Source: NSW Historical Land Register Viewer, Certificate of Title Vol.1751. No. 36.

3.2.6.1 Property Ownership Details

Year/Date	Owner	Source
1897	Florence Lilian Edwards	Vol 1237. Fol. 18
1906	William Joseph O'Brien, Dental surgeon	Vol.1751. 36
1908	Patrick Herbert O'Brien	Vol.1751. 36

1920	Eben Gowrie Waterhouse of Gordon lecturer in modern language	Vol.1751. 36.
1932	Doris Adeline Selby of Gordon Spinster	No. 538. Book 1811

3.2.6.2 Construction Date

Based on the historical research outlined herein, we have identified the construction date of c.1930–1943. This is substantiated by the historical aerials sourced from NSW Historical Imagery Viewer and represented in the table below. Note however that substantial additions were undertaken by 1998.

Date	Image	Commentary
1930		The image is of low resolution that makes it difficult to determine if a structure is on the lot or not. However, a small square structure is discernible on the Lot.
1943		By this time the house has been built.
1965		The circular driveway and landscape yard has been added to the lot by this time. The building has no obvious changes to the overall scale and bulk of the place.

1982



No obvious changes to the overall scale and bulk of the house.

No changes to the landscaped yard.

1998



By this time a swimming pool and a tennis court have been added to the lot.

A substantial addition to the south had been constructed by this time.

2025



By late 2020 the roof material had been upgraded to modern materials.

There is no obvious changes to the scale or bulk of the house, and no changes to the landscaping around the lot.

4 Heritage Significance

4.1 What is Heritage Significance

Before undertaking change to a listed heritage item, a property within a heritage conservation area, or a property located in proximity to a listed heritage item, it is important to understand the heritage values of the place and its broader heritage context. This understanding will underpin the approach to any proposed changes and identify what is important and why, and how these values can be protected. Statements of heritage significance summarise the heritage values of a listed heritage item – why it is important and why a statutory listing was made to protect these values.

4.2 Heritage Listings

4.2.1 Subject Site Heritage Listings

21 and 23 McIntosh Street and 55 Werona Avenue are not listed as a heritage item under Schedule 5 of the KLEP 2015, or in the State Heritage Register. However, 25 McIntosh Street is located within the Gordon Park Estate, McIntosh and Ansell Conservation Area (C22) under Part 2 of Schedule 5 of the KLEP 2015.

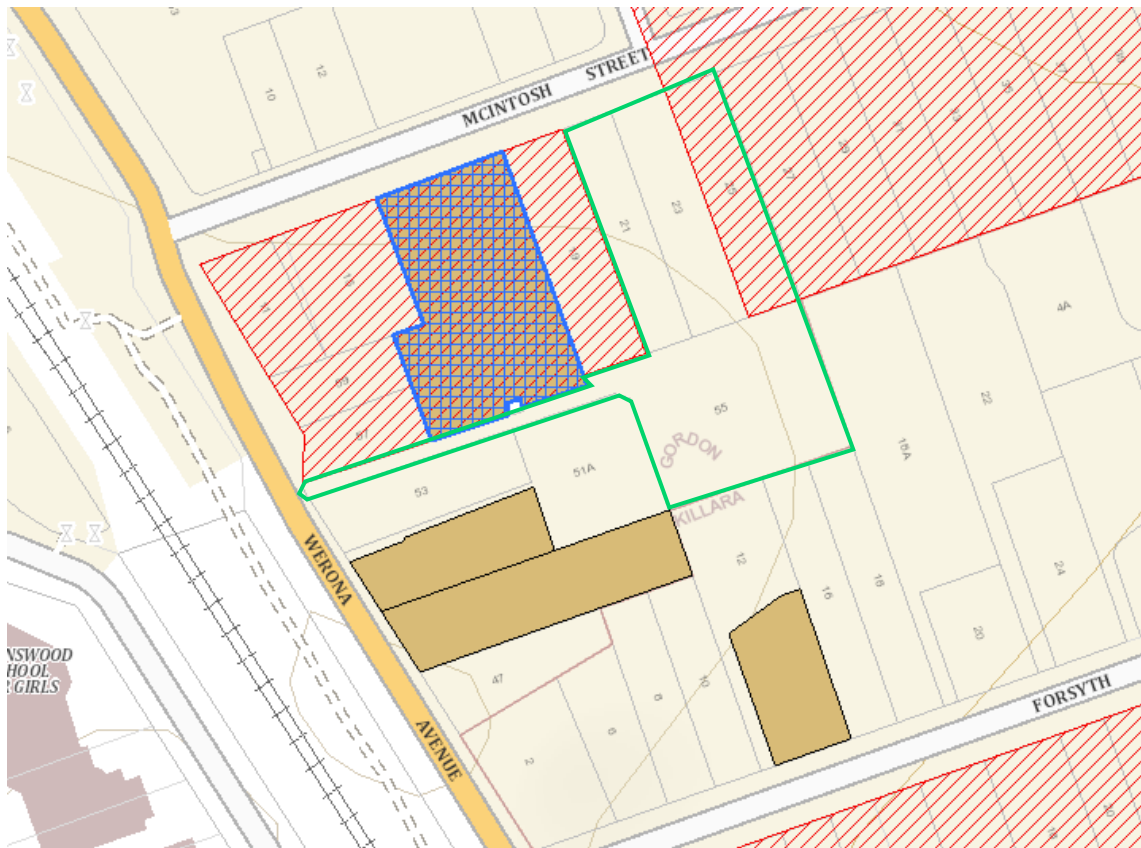


Figure 21 Heritage context map showing the subject site (outlined in green).

Source: NSW Planning Portal ePlanning Spatial Viewer, 2025.

4.2.2 Gordon Park Estate, McIntosh and Ansell HCA Statement of Significance

Historically, the area represents the fine residential development of Gordon during the nineteenth and twentieth century. The area provides evidence of the 1823 land grant to Michael Ansell and the subsequent subdivision of this grant by Robert McIntosh as the Gordon Park Estate. This subdivision demonstrates the development resulting from the construction of the North Shore rail line at the end of the nineteenth century.

The area largely retains the overall form and layout of the original subdivision pattern with consistent streetscapes of houses in their garden setting. The building stock includes a high proportion of quality houses, representing examples of late federation and inter-war architecture. The buildings survive reasonably intact within mature gardens.

The conservation area is of local heritage significance in terms of its historical, aesthetic and representative values. This satisfies three of the Heritage Council criteria of local heritage significance for local listing.¹³

4.2.3 25 McIntosh Street Revised Statement

Through detailed analysis of 25 McIntosh Street heritage characteristics contained within this report, Urbis believes that the above established statement of significance for C22 regarding to 25 McIntosh Street is not useful in providing an accurate reflection of the Gordon Park Estate, McIntosh and Ansell Conservation Area’s character. The subject dwelling at 25 McIntosh Street, Gordon is not a good, high-quality example of inter-war architecture that is ‘reasonably intact within mature gardens.’ The dwelling features extensive contemporary modifications to its primary street-facing façade along with substantial modern extensions present at the ground floor, and the addition of an extra floor, resulting in the obscurement of its original form and footprint.

A detailed review of the 25 McIntosh Street level of intactness and contextual analysis has found that the dwelling’s contribution to the Heritage Conservation Area has been significantly diminished. Due to the extensive presence of contemporary additions and alterations that occurred between 2008 – 2009, the building is not warranted for inclusion within the Heritage Conservation Area.

21 McIntosh Street is adjoining the Gordon Park Conservation Area (see below). The Gordon Park Conservation Area statement of significance notes that the area ‘retains a grouping of mostly intact Victorian, Federation and inter-war period housing, including the State Heritage Register listed “Eryldene” at 17 McIntosh Street.’ A detailed review of 21 McIntosh Street level of intactness and contextual analysis has found that the dwelling’s contribution to the Gordon Park HCA has been significantly diminished. Due to the alterations and additions that occurred 2004–2005. The dwelling is not an example of an intact Victorian, Federation or Inter-war period house.

4.3 Nearby Heritage Items Statements of Significance

The following list outlines the established statements of significance for relevant heritage items in the vicinity of the subject site sourced from the State Heritage Inventory.

Heritage Item	Statement of Significance
Eryldene	<i>Eryldene is of outstanding cultural significance being the most intact surviving example of the work of William Hardy Wilson, the prominent early twentieth century Australian architect, artist, writer and advocate of the Colonial Revival style. It comprises a residence, complementary outbuildings and garden setting, reflective of the close similarity of interests of both architect and client, Professor E G Waterhouse. The garden was developed by its owner to a remarkable individual character and was the setting for his world-renowned efforts in developing the nomenclature and hybridisation of camellias. It remains a resource for their study. The house, gardens and outbuildings are significantly intact, with some room settings retaining their original furnishings and detail (Moore et.al 1988:17).</i>

¹³ NSW State Heritage Inventory 2024, Gordon Estate, McIntosh and Ansell Conservation Area (C22), <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=1882692>.

	<i>The place is also of considerable aesthetic significance for its demonstration of an exemplary example of a garden as an extension of a house, with a series of open air rooms carefully furnished with trees, shrubs and flowers, superbly proportioned garden structures (temple, garden study, teahouse/tennis pavilion, fountain, pigeon-house)(Read, S., Heritage Office, 2004).¹⁴</i>
Gordon Park Conservation Area	<i>Historically, the area represents the fine residential development of Gordon during the nineteenth and twentieth centuries. The area provides evidence of the 1823 land grant to Michael Ansell and the subsequent subdivision of this grant by the family of Robert McIntosh in 1895. This subdivision demonstrates the development resulting from the construction of the North Shore rail line at the end of the nineteenth century.</i> <i>The area retains a grouping of mostly intact Victorian, Federation and inter-war period housing, including the State Heritage Register listed "Eryldene" at 17 McIntosh Street, which illustrates the subdivision history and development of the area. The area has aesthetic significance for the high proportion of quality houses with established gardens on large allotments. "Eryldene" is a focus for admirers of Professor Waterhouse's life and works, and also a remarkable evocation of a way of life and philosophy of living, increasingly remote from contemporary society. It also reflects cultured, intellectual life in Sydney from the First World War to the Modern period.</i> <i>The camellia collection at Eryldene is of research significance for its potential to reveal further botanical knowledge and understanding of the species.</i> <i>The area is of local heritage significance in terms of its historical, aesthetic and research value. This satisfies three of the Heritage Council criteria of local heritage significance for local listing.¹⁵</i>
Rochester Dwelling House, 51 Werona Avenue	<i>Reasons for listing; architectural, Municipal significance.¹⁶</i>
Dwelling, 49 Werona Avenue	<i>Reasons for listing; architectural, Municipal significance¹⁷</i>
Dwelling, 14 Forsyth Street	There is no recorded statement of significance for this property.

¹⁴ NSW State Heritage Register, Eryldene (SHR#00019), <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=5045350>.

¹⁵ NSW State Heritage Register, Gordon Park Conservation Area (LEP #C17), <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=1882691>.

¹⁶ NSW State Heritage Register, Rochester, dwelling house (LEP#129), <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=1880501>.

¹⁷ NSW State Heritage Register, Dwelling house (LEP#128), <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=1880500>.

5 The Proposal

The subject site is within 380m of Gordon Railway Station and is well-serviced by public amenities such as a supermarket, cafes and destination retail shops. Community facilities such as swimming pools, a library, tennis courts, and active open space are easily accessible.

It is proposed to demolish the existing residences at 21,23 and 25 McIntosh Street and 55 Werona Avenue to accommodate three residential flat buildings with in-fill affordable housing.

Key aspects of the proposal are outlined below.

- Demolition of four buildings in the subject site.
- Removal of ancillary buildings such as garages/sheds.
- Removal of vegetation.
- Construction of three towers (Buildings A, B and C), 8 storeys (including a roof level) that consists of:
 - Increased setbacks to the western boundary and greater separation between buildings to conserve the setting, views and garden context of the State-listed heritage item Eryldene and to reduce visual and overshadowing impacts.
 - A refined façade design incorporating horizontal articulation, recessed glazing and varied massing to break down building scale and avoid the appearance of a continuous built form when viewed from McIntosh Street and nearby heritage areas.
 - A sympathetic material palette dominated by warm, earthy brick tones, timber elements and subdued metal finishes, selected to be recessive within the landscaped setting and responsive to the character of surrounding heritage conservation areas.
 - Basement car parking located beneath the buildings, enabling active frontages, generous setbacks and significant deep soil zones at ground level to support landscaping and tree establishment.
 - Communal open space integrated within the development and landscaped areas, supporting residential amenity while reinforcing the garden character of the site.
- Total of 151 apartments across the three towers.
- Two levels of basement carparking (178 spaces), including 166 bicycle parking spaces and location for waste services.
- Material palette incorporating masonry, glass and lighter metal finishes, and use of brick balustrades up to Level 4.
- Additional landscaping along McIntosh Street, the western boundary, and communal open space areas.
- 10m ground level side setbacks along the western boundary, increasing to 19.35 m at Levels 4–7 of Building A, and up to 12m Levels 4–7 of Building B.
- Partial filled in space between Buildings A and B up to Level 3.

Urbis has been provided with drawing documentation prepared by PMDL. This HIS has relied on these plans for the impact assessment include in Section 6. Extracts of the proposed plans are also provided overleaf. Full size plans should be referred to for detail.

Table 1 List of Architectural Plans

Author	Drawing No.	Drawing Title	Revision	Date
PMDL	DA01.00	Demolition Plan	B	February 2026

PMDL	DA01.01	Site Plan	C	February 2026
PMDL	DA10.00	Basement Plan 2	B	February 2026
PMDL	DA10.01	Basement Plan 1	B	February 2026
PMDL	DA10.02	Ground Floor Plan	C	February 2026
PMDL	DA10.03	Level 1 Plan	B	February 2026
PMDL	DA10.04	Level 2 Plan	B	February 2026
PMDL	DA10.05	Level 3 Plan	B	February 2026
PMDL	DA10.06	Level 4 Plan	B	February 2026
PMDL	DA10.07	Level 5 Plan	B	February 2026
PMDL	DA10.08	Level 6 Plan	B	February 2026
PMDL	DA10.09	Level 7 Plan	B	February 2026
PMDL	DA10.10	Roof Plan & Level 8	C	February 2026
PMDL	DA10.11	Building C Roof Plan	C	February 2026
PMDL	DA20.01	Buildings A & B North and South Elevations	C	February 2026
PMDL	DA20.02	Buildings C North and South Elevations	C	February 2026
PMDL	DA20.03	Building C North and South Elevations	C	February 2026
PMDL	DA20.04	Building C and Front Fence Elevation	C	February 2026
PMDL	DA20.05	East Elevation	C	February 2026
PMDL	DA20.06	West Elevation	C	February 2026
PMDL	DA20.07	Materials and Finishes Schedule	C	February 2026
PMDL	DA30.01	Sections 1	C	February 2026
PMDL	DA30.02	Sections 2	C	February 2026
PMDL	DA30.03	Sections 3	C	February 2026
PMDL	DA30.10	Driveway Details	C	February 2026
PMDL	DA50.00	GFA & Affordable Housing Diagrams 1	C	February 2026

PMDL	DA50.01	GFA & Affordable Housing Diagrams 2	C	February 2026
PMDL	DA50.10	Communal Open Space	C	February 2026
PMDL	DA50.20	Height Plane Diagram 1	C	February 2026
PMDL	DA50.21	Height Plane Diagram 2	C	February 2026
PMDL	DA50.30	Cross Ventilation Diagrams	C	February 2026
PMDL	DA50.50	Storage Calculation Diagram	C	February 2026
PMDL	DA50.51	Storage Calculation Diagram	C	February 2026
PMDL	DA50.60	Solar Access Diagram 1	C	February 2026
PMDL	DA50.61	Solar Access Diagram 2	C	February 2026
PMDL	DA50.62	Solar Access Diagram 3	C	February 2026
PMDL	DA50.63	Solar Access Diagram 4	C	February 2026
PMDL	DA50.64	Solar Access Diagram Plans 1	C	February 2026
PMDL	DA50.65	Solar Access Diagrams Plans 2	C	February 2026
PMDL	DA50.70	Shadow Study – Winter Solstice 9am –12pm	C	February 2026
PMDL	DA50.71	Shadow Study – Winter Solstice – 1pm – 3pm	C	February 2026
PMDL	DA60.00	Livable Unit Layout 1	B	February 2026
PMDL	DA60.01	Livable Unit Layout 2	B	February 2026
PMDL	DA60.05	Deep Soil & Landscape Diagram	C	February 2026
PMDL	DA70.00	3D View	C	February 2026
PMDL	DA70.01	3D View	C	February 2026
PMDL	DA70.02	3D View	A	February 2026

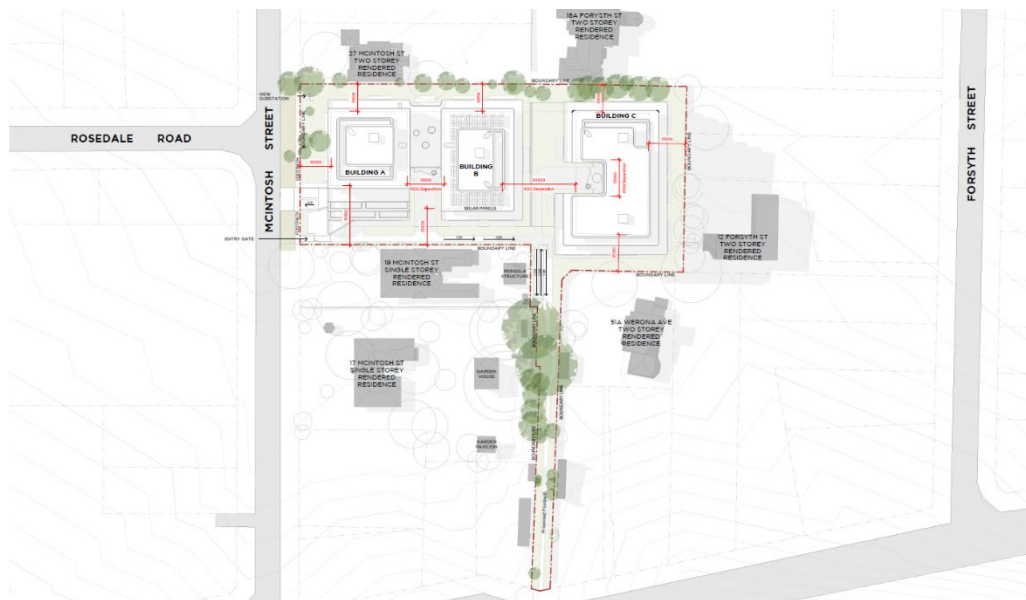


Figure 22 site plan showing the changes in the setbacks.

Source: PMDL, 2026, drawing no. DA01.01.

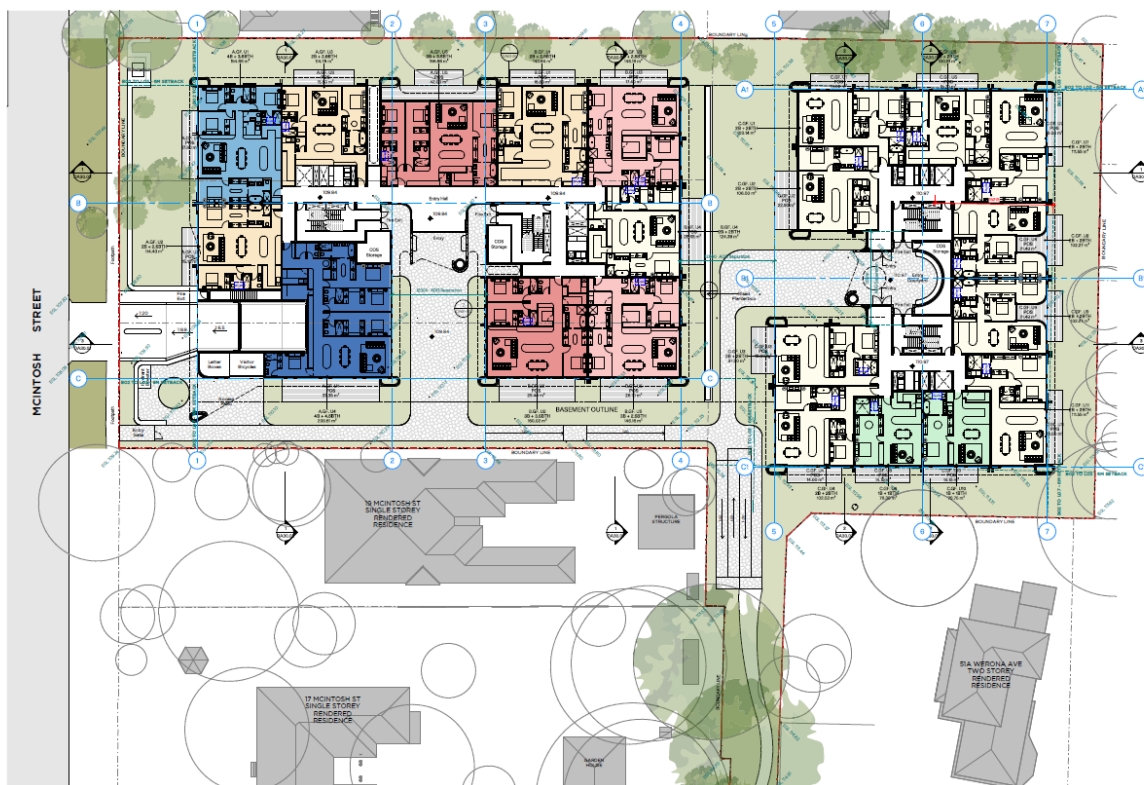


Figure 23 Extract of the site plan showing a greater separation between the subject site and 19 McIntosh Street.

Source: PMDL, 2026, drawing no. DA10.02.

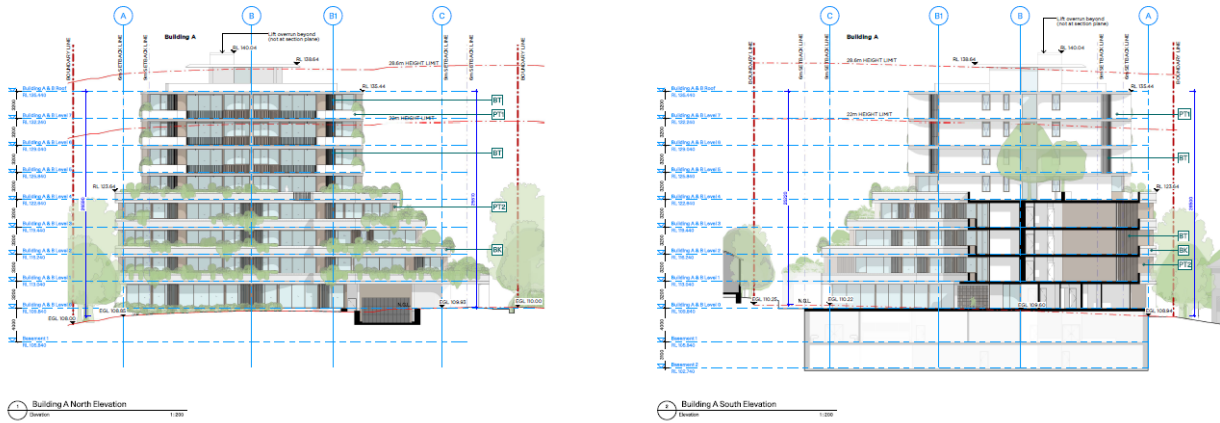


Figure 24 Extract of the north and south elevations of Building A, showing the primary façade fronting McIntosh Street (northern elevation).

Source: PMDL, 2026, drawing no. DA20.01.



Figure 25 Extract of the east elevation, showing a separation between the three buildings and the stepped design.

Source: PMDL, 2026, drawing no. DA20.05.



Figure 26 Extract of the primary façade of Building A, fronting McIntosh Street.

Source: PMDL, 2026, drawing no. DA70.00.

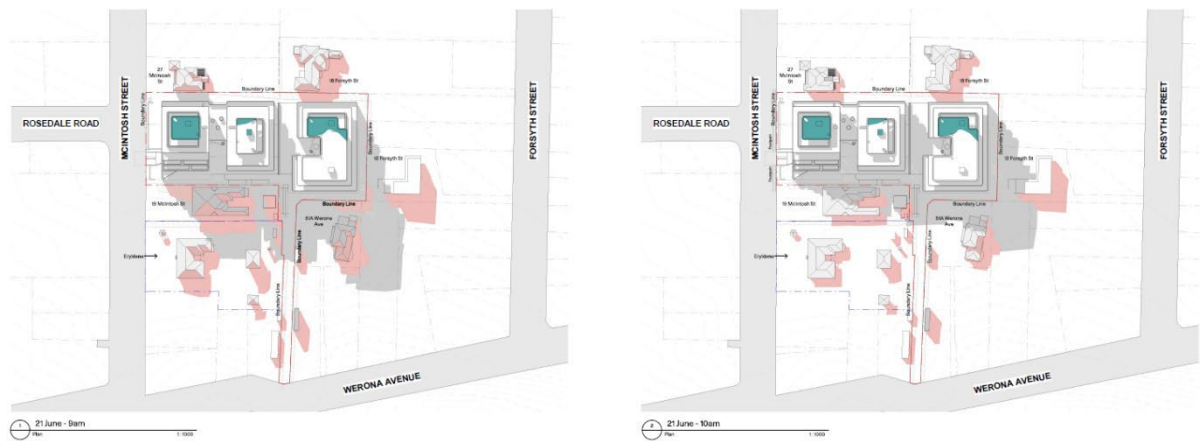


Figure 27 Shadow study – winter solstice showing the shadow impact to Eryldene limited to the eastern corner and only for a small timeframe.

Source: PMDL, 2026, drawing no. DA5070.



Figure 28 Extract of the proposed materials and finishes schedule.

Source: PMDL, 2026, drawing no. DA20.07.

5.1 Visual Context

Gyde has prepared visuals and views which would be effected by the proposed development.¹⁸ The visuals include views from:

- McIntosh Street looking west;
- Rosedale Road looking south;
- McIntosh Street looking south;
- Werona Street looking east; and
- Four views from within the state heritage place 'Eryldene'.



Figure 29 McIntosh Street view looking west.

Source: Gyde, 2026.



Figure 30 McIntosh Street View looking south.

Source: Gyde, 2026.



Figure 31 View from Rosedale Road looking south.

Source: Gyde, 2025.



Figure 32 View from Werona Avenue looking east.

Source: Gyde, 2026.

¹⁸ Gyde 2026, Gyde Draft Visuals, prepared for the SSDA lodgement.

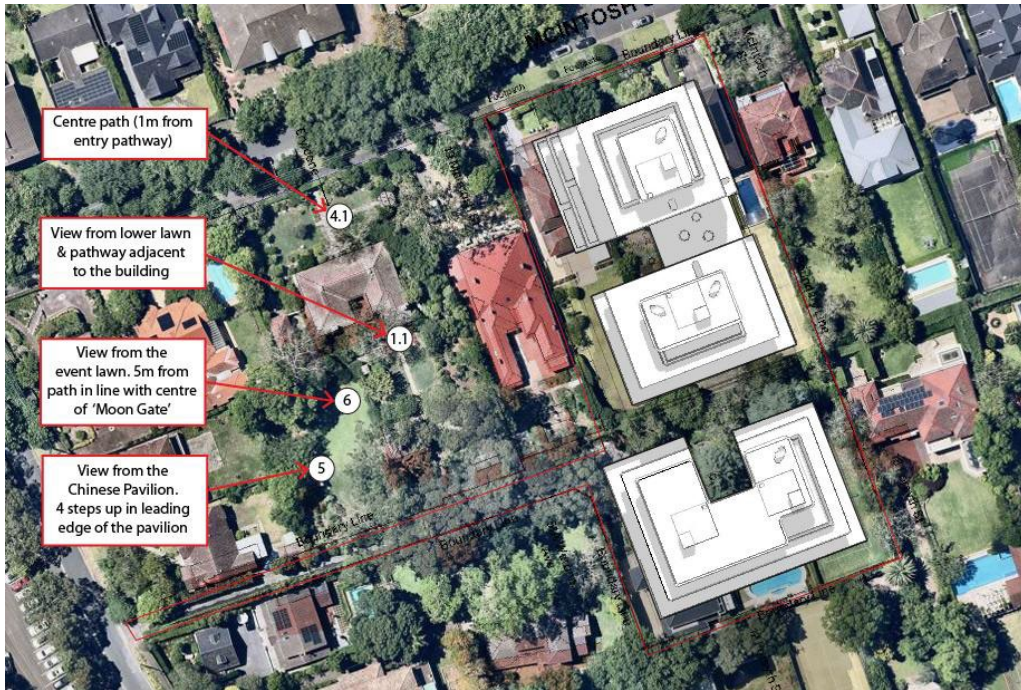


Figure 33 Diagram indicating view points from within Eryldene Estate towards the proposal.

Source: Gyde, 2026.



Figure 34 View 1.1 from lower garden looking east.

Source: Gyde, 2026.



Figure 35 View 4.1 from entry pathway looking east.

Source: Gyde, 2026.



Figure 36 View 5 from the Chinese pavilion.

Source: Gyde, 2026.



Figure 37 View 6 from the upper lawn looking east towards 'Moon Gate'.

Source: Gyde, 2026.

6 Impact Assessment

The following impact assessment has assessed the proposed works against the relevant provisions and controls of the Council's statutory and non-statutory planning controls as well as the Heritage NSW 'Statement of Heritage Impact' assessment guideline questions.

6.1 Ku-ring-gai Local Environmental Plan 2015

The table below provides an impact assessment of the proposal against the relevant clause for heritage conservation in the Ku-ring-gai LEP 2015.

Table 2 KLEP 2015 Clause 5.10

Clause	Response
(1)Objectives <i>The objectives of this clause are as follows:</i> a. <i>to conserve the environmental heritage of Ku-ring-gai,</i> b. <i>to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,</i> c. <i>to conserve archaeological sites,</i> d. <i>to conserve Aboriginal objects and Aboriginal places of heritage significance.</i>	a. No works to the nearby heritage listed items of significant fabric within the HCA are proposed as per the development scheme. Further, none of the dwellings within the subject site are of heritage significance warranting retention. Therefore, the environmental heritage of the area will not be physically impacted. The subject site is identified within a TOD area, where increased density is anticipated as part of the strategic planning framework. While the proposed development introduces a greater scale than the surrounding low-rise heritage context, it has been designed to ensure that the heritage significance of the Gordon Park HCA (C17), the Gordon Park Estate, McIntosh and Ansell HCA (C22), and nearby heritage items is conserved. The design incorporates appropriate setbacks to the western boundary, stepped building forms and greater separation between buildings to reduce perceived bulk and visual dominance. These measures assist in conserving important views, maintaining visual connections to sky and tree canopies, and providing an appropriate transition in built form to adjacent heritage areas, consistent with the objectives of Clause 5.10. Key findings of the visual impact assessment indicate that views of the proposed development from surrounding heritage items and conservation areas are partly filtered by existing and proposed vegetation. Where the development is visible, it is read as a background element within a landscaped setting rather than as a dominant or intrusive built form. This is detailed further below in this report.

- b. As discussed above, one of the dwellings (25 McIntosh Street) is located within a Heritage Conservation Area under any instrument and therefore the heritage significance of the adjacent Gordon Park Estate, McIntosh & Ansell HCA (C22) will be removed, as it has been shown to make no contribution to the HCA.

The proposal does not involve the removal of heritage items or contributory buildings within the conservation areas, and the Federation and Inter-war dwellings that underpin the heritage significance of the locality are retained. When considered in its updated form, the proposal is not considered to result in an irreversible impact on the heritage significance, setting or views of the surrounding conservation areas or heritage items and is consistent with the heritage conservation objectives of Clause 5.10 of KLEP 2015.

Similarly, no work is proposed to adjacent locally listed items. The proposal integrates several measures such as a considered massing resolution, local context informed material palette and a staggered stepped back form to consider and appropriately respond to the adjacent items.

(2) Requirement for consent

Development consent is required for any of the following:

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

The site is partly located within a HCA, identified as the Gordon Park Estate, McIntosh & Ansell Conservation Area (C22) under part 2 of Schedule 5 of the KLEP 2015. Therefore, approval is required for the proposed works as the proposal involves erecting a building on land that is within a heritage conservation area.

- g. *erecting a building on land:*
 - i. *on which a heritage item is located or that is within a heritage conservation area, or*
 - ii. *on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance,*
- h. *subdividing land:*
 - i. *on which a heritage item is located or that is within a heritage conservation area, or*
 - ii. *on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance.*

4) Effect of proposed development on heritage significance

The consent authority must, before granting consent under this clause in respect of a heritage item or heritage conservation area, consider the effect of the proposed development on the heritage significance of the item or area concerned. This subclause applies regardless of whether a heritage management document is prepared under subclause (5) or a heritage conservation management plan is submitted under subclause (6).

A detailed heritage impact assessment has been undertaken in the following sections of this report. The proposed development has been assessed to have an acceptable impact on the items of environmental significance in the vicinity.

5) Heritage assessment

The consent authority may, before granting consent to any development:

- i. *on land on which a heritage item is located, or*
- j. *on land that is within a heritage conservation area, or*
- k. *on land that is within the vicinity of land referred to in paragraph (a) or (b), require a heritage management document to be prepared that assesses the extent to which the carrying out of the proposed development would affect the heritage significance of the heritage item or heritage conservation area concerned.*

This heritage impact statement has been prepared to assist the consent authority in their determination and to assess the potential heritage impacts of the proposed works. This heritage impact statement satisfies the requirement under this clause.

6.2 Ku-ring-gai Development Control Plan 2024

The table below provides an impact assessment of the proposal against the relevant controls for heritage conservation in the KDCP.

Table 3 KDCP Heritage Conservation Controls

19B.1 Demolition within HCAs

1. *In accordance with the Ku-ring-gai Local environmental plan, development consent is required for demolishing or moving a building, work, relic, or tree within a conservation area.*

This report finds that the building to be removed within the HCA does not make a contribution to the significance of the HCA as the visible fabric to the street dates predominantly from the 2000s. The subject site, including the portion within the HCA is suitable for development.

2. *The demolition of Heritage Items and contributory properties within HCAs is not supported.*

25 McIntosh Street is located within an HCA. However, Council has identified the dwelling as a neutral building within the HCA. The dwelling has been subject to extensive contemporary alterations and additions, particularly to the primary façade, which are not sympathetic to the original style, form, scale or materials. As a result, the building does not contribute to the heritage significance of the HCA.

While it is acknowledged that demolition will result in the loss of an existing residential building and its replacement with a high density building, the result is not considered to necessarily be detracting in the context of the conservation area. The proposed development is of a high quality design and ensures that the heritage significance of the conservation area and nearby heritage items is conserved.

The design incorporates increased setbacks and a reduction in the bulk of Buildings A and B to minimise visual dominance and ensure the development does not detract from the surrounding heritage context. Existing landscaping, including mature vegetation within the grounds of Eryldene and along site boundaries, is retained to further reduce visual impacts when viewed from nearby heritage items and within the HCA.

3. *Whole demolition of buildings, structures and landscape features (including significant trees) is generally not supported unless the applicant can satisfactorily demonstrate:*

- i. *Demolition will not result in any adverse impacts on HCA character or streetscape.*
- ii. *retention and stabilisation of the building or structure is unreasonable;*
- iii. *all alternatives to demolition have been considered with reasons provided why the alternatives are not acceptable.*

i. The demolition of the existing dwellings present on the subject site will not result in adverse impacts to the character of the setting of the HCA or the nearby heritage items. This conclusion was established through contextual analysis and a review of the sites' intactness which identified that the dwellings contribution to the local HCA have been significantly diminished through extensive alterations to the primary street facing façades. The dwellings at 21 and 25 McIntosh Street, in particular which are of contemporary construction and have no aesthetic relationship with the surrounding

- iv. *the replacement building is compatible with the identified significance and character of the streetscape and the HCA as a whole.*

character of the HCA. 55 Werona Avenue and 23 McIntosh Street are not heritage items nor within or adjoining the HCA. 55 Werona Avenue dwelling and grounds have been substantially altered through a series of approved works, resulting in a loss of integrity and heritage fabric.

ii. N/A

iii. N/A

- iv. The replacement building is assessed in the below section of this report. Note that only a small portion of the replacement building would be located within the HCA. The proposed development would be of a substantially different scale to what exists in the HCA however setbacks, massing and materiality are being investigated to mitigate the visual impact of this. It is a recommendation of this report that design resolution prior to the issue of a Construction Certificate involve a heritage consultant to ensure impacts are further mitigated.

19C Development within HCAs– Alterations and Additions and New Buildings

19C.1 Local Character and Streetscape

2. *Where an HCA is characterised by a mix of one and two storey buildings, proposed works to contributory properties are to:*

- i. *retain the original character of a building;*
- ii. *match the scale and forms of the existing buildings within the streetscape (see Figure 19C.1-2).*

The proposed design does not comply due to its large vertical scale and contemporary nature. It is noted that the proposed building would be of a different scale and typology than that which currently exists on the site or in the context of the HCA or nearby heritage items. However, the proposal exists in a legislative context which will facilitate increased uplift of the same type in particular areas. The development would be in line with the planned future character of this area, and others around train stations and transport corridors. The location of this development is appropriate in that it occupies a site which currently comprise highly altered dwellings which as a group do not create a consistent early character.

The scale and form of the proposed development have some relationship with existing buildings within the streetscape through consideration of the established setback pattern and some modulated façade projection.

The development would adopt a podium element which partly breaks down the difference in scale

between the development and the scale of the surrounding area.

The site has its short boundary to McIntosh Street and extends southward. Therefore, only Building A will be prominent in the context of the streetscape, Buildings B and C would be somewhat obscure behind which would reduce that apparent bulk of the development.

4. *The scale and massing of new buildings is to be integrated into the established character of the HCA and respect the scale, form and character of adjacent or nearby development. They are to incorporate design elements such as the roof forms, facade and parapet heights, door, window and verandah proportions of contributory properties in the HCA, particularly neighbouring buildings from the same key development period.*

The proposed design features a podium on the primary façade that provides some response to the datums of the nearby multi-storey dwellings. Increased setbacks to the western site boundary also provide visual relief above the podium when viewed from the public domain and allow for additional landscaping, reinforcing the established leafy streetscape of McIntosh Street. The development also steps down to the southeast, in keeping with the falling topography in that direction and to minimise as much as possible the impact of the scale of the development on westward views towards the State heritage item Eryldene.

5. *The design and character of any new buildings are to be informed by the:*
- i. *Date and style of contributory properties;*
 - ii. *Scale and form of contributory properties;*
 - iii. *Street and subdivision patterns;*
 - iv. *Setbacks of neighbouring contributory properties;*
 - v. *Materials, Building techniques and details used in the HCA;*
 - vi. *Views vistas and skylines.*

- i. A contemporary architectural style is proposed as opposed to the early 20th century styles which characterise the HCA and nearby heritage items. While the style is not a direct reflection of the early building in the vicinity, the material palette has been designed to respond to the predominant materiality of the area. The contemporary architectural approach is in line with the planned future character of the area arising from the updated TOD.
- ii. The proposed horizontal and vertical scale of the proposal is larger than the one-two storey dwellings characterising the HCA, this is in line with planned future higher density character of the area arising from the updated TOD. However, the focus of the design has been to visually break down the bulk of the development through splitting the development into three separate buildings, and the use of a podium element. The building addressing McIntosh Street has been setback and designed with a differentiated façade to reduce its apparent height and ensure that views along the street are retained.
- iii. Most of the site is not within a HCA, therefore, the understanding of the

subdivision layout within the HCA would be largely retained.

- iv. The side setbacks have been increased to limit the potential impact on the neighbouring properties. However, nearby listed items along McIntosh Street and Werona Avenue feature a substantial set back to the street frontage which is reflected within the parallel northern façade of the design.
- v. Contemporary application of traditional building materials has been conveyed through the podium levels of the proposed scheme through brick and timber materiality which is a prevalent materiality throughout the HCA. Light and neutral contemporary colours and materials have been incorporated into the resolution of the upper levels to minimise their visual weight in the streetscape.
- vi. The proposed design incorporates increased setbacks to the west boundary of the subject site and an increased separation between the three buildings, reducing the visual bulk of the development when viewed from Eryldene. Existing vegetation, together with additional proposed landscaping within the western setbacks, further limits visibility and moderates the perceived bulk and scale of the development.

6. *Facades of new buildings are to be modulated to break down the scale of new development*

The proposed design features a modulated street-facing façade. Upper-level recesses and façade articulation break down the building mass and avoid a continuous or sheer wall presentation along the side boundaries and avoid monolithic massing.

The front setback landscaping incorporates a diverse mix of tall canopy trees, layered understory planting, and a combination of evergreen and exotic ornamental species which align with the established garden character and setting of the surrounding area, and enhance the integration between the public and private domain.

7. *The height of new buildings is not to be higher than contributory properties*

The height of the proposal is higher than the height of the surrounding one-two storey contributory dwellings, this is in line with planned future higher density character of the area arising from the updated TOD. Measures outlined above

	in this report have been applied to visually break down the bulk of the development.
8. <i>New building roofs visible from the street are to reflect the size, shape, pitch, eaves and ridge heights, and bulk of contributory properties and roofs. They are to respect the complexity and patterns of predominant roof shapes and skylines of the HCA.</i>	The proposed scheme has a flat roof which is a departure from the more complex pitched roof forms found within the HCA. Similarly, the proposal does not convey the eaves and ridge heights found within the surrounding context. This is appropriate given the proposal is of a different topology compared to the existing context and the HCA will exist in the future in the context of more developments similar to the proposed. However, as discussed elsewhere in this report, other devices have been adopted to reduce impacts on the context.
9. <i>New buildings may be contemporary in design, however, their scale, form and detail is not to detract from the scale, form, unity, cohesion and predominant character of streetscape elements around.</i>	The simplistic design of the proposed scheme's formal arrangement and lower level of façade detail does not detract from contributory items within the area. The building has been designed to be well articulated to break down the visual bulk but to be of a simple materiality to not dominate the context. The materiality chosen for the contemporary design is complimentary to the surrounding buildings and the HCA.
10. <i>Where an HCA is characterised by single-storey development, single-storey development on infill sites is preferred. New two-storey houses will only be permitted where the upper floor is designed within the roof and where the new building is in keeping with the height, mass and proportions of contributory properties in the vicinity.</i>	Two-storey contemporary additions are common in surrounding dwellings within the HCA. The proposed scheme involves the construction of an 8 level (including roof level) structure which is in line with planned future higher density character of the area arising from the updated TOD. Note however that the bulk of the development is located outside of the HCA.

19C.2 Setbacks and Building Separation

1. <i>The siting of alterations, additions and new buildings are to maintain the established streetscape pattern, including principal dwellings, garages, carports and garden structures.</i>	The proposed scheme respects the set back of adjacent contributory building, particularly the state heritage item 'Eryldene' which features a substantial set back in the streetscape and consistent with the HCA streetscape pattern.
2. <i>Where there is a uniform building setback within streets, alterations and additions and new buildings are to respect the established pattern and not be located forward of adjacent buildings. Where variations in setback exist, the larger set back will apply. Side set backs are to be consistent with historic patterns.</i>	The current design for the proposed development of three residential buildings has prioritised the setback along McIntosh Street, and to the western boundary. The setbacks follow the established pattern that already exists on McIntosh Street with dwellings having a generous setback from the street. The proposed development is in line with the existing setback of 21 McIntosh Street. 'Eryldene' has a deeper setback from McIntosh

4. <i>New buildings are not orientated across sites contrary to the established alignment pattern</i>	Street than other dwellings on the street, this is due to the gardens being to focal point of Eryldene. Existing vegetation, together with additional proposed landscaping within the western setbacks, further limits visibility and moderates the perceived bulk and scale of the development. The development is orientated in the established alignment pattern of McIntosh Street, with the buildings being orientated to be street facing. The Visuals prepared by Gyde demonstrate that the design presents more modestly within the Eryldene context, with reduced height and smaller glazing elements contributing to a less visually dominant appearance.
5. <i>The location of new buildings is to ensure that significant views to and from places within the HCA are retained.</i>	The dense vegetation within the immediate vicinity limits the views and vistas around the subject site. The works would be entirely confined within the subject site and appropriate landscaping is proposed. Therefore, the proposed scheme will be somewhat visually softened in views from the public domain and views around the context of the HCA and proximate heritage items. Refer to section 5.2b Visual Context in the PMDL Design Report. The State listed heritage item 'Eryldene' to the west would be separated from the development by an increased setback of the western elevation and the house at 19 McIntosh Street which is outside the subject site and is not identified to be of significance. Further the listed building is located towards the centre of its lot and is surrounded by a garden setting which is both understood to be significant and provides some visual isolation to ensure that Eryldene remains appreciable. Building A is partly visible in the distance through the gap in the canopy. While new fabric introduces increased scale, it does not significantly obstruct the visible sky component, nor does it reduce the significance or character of the gardens. The position behind the existing canopy lessens its potential to become a visually dominant new focal point.

19C.3 Gardens and Landscaping

1. <i>The established landscape character (height of the tree canopy, early gardens, remnant trees, historic tree plantings) that contributes</i>	It is understood that some extant vegetation and mature trees on site are required to be removed as a part of the proposal. The proposal however
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<i>to the significance of the streetscape and the HCA as a whole are to be retained and conserved in any new development. The reinstatement of original planting, where known, is encouraged.</i>	mitigates this impact through the planting of additional supplementary street facing vegetation which will soften the appearance of the development from the street and established continuity with the vegetation in other part of the HCA. Further plantings are proposed for the western boundary to aid in softening the development.
2. <i>Original garden features such as gates, paths, stonework, garden terracing, tiling, cement crazy paving, walling and garden edging are to be retained and conserved.</i>	All extant garden features date from contemporary renovations, consequently the removal of these elements will not detract from the character of the surrounding HCA.
3. <i>New paving and hard surfacing, particularly to front setbacks is to be limited.</i>	The design scheme features minimal intervention of additional hard-paved area to the frontage of McIntosh Street. The setbacks would be landscaped.
4. <i>Front gardens are to avoid screening buildings from the street.</i>	The current context of McIntosh Street is heavily vegetated with trees lining street, many yards also have mature trees and vegetation that screen the buildings. The front setback landscaping incorporates a diverse mix of tall canopy trees, layered understory planting, and a combination of evergreen and exotic ornamental species which better align with the established garden character and setting of the surrounding area, and to enhance the integration between the public and private domain. Therefore, front gardens that screen the building is acceptable within the context of McIntosh Street, Eryldene character.
5. <i>Materials for new garden paving or pathways are to be appropriate to the architectural style for the HCA, such as gravel for Federation style and sandstone flagging for inter-war styles. Plain or stencilled concrete is not acceptable.</i>	The proposed materiality for paving to the front of the site is to be specified to adhere to this provision.
6. <i>New driveways are to provide landscaping on side boundaries.</i>	The proposed driveway scheme features plantings on the western and eastern boundaries of the site to adhere to this provision
7. <i>New, traditionally designed gardens that enhance historic and aesthetic character of the streetscape and the HCA as a whole are encouraged.</i>	The design of the proposed garden has been resolved to adhere to this provision. The proposed plans retains some vegetation along McIntosh Street, and includes new plantings between the buildings to continue the aesthetic of a designed garden. However, the character of the immediate

	context is quite dense with vegetation along the streetscape with majority of places have landscape character that block views to the houses.
19C.4 Access and Parking	
4. <i>New parking areas, garages and driveways are to be designed carefully so that they do not dominate the principal elevations or detract from the immediate streetscape and incorporate provisions for landscaping.</i>	The establishment of underground carparking facilities along the site's northern side boundary will minimise visual obstruction to the street-facing elevation.
5. <i>The siting of new driveways are to be consistent with the established pattern in the immediate streetscape and the HCA as a whole.</i>	The proposed side-access underground driveway scheme will not be visible from the streetscape and is consistent with the driveway arrangement of nearby dwellings along McIntosh Street.
9. <i>Excavation for a driveway is only permitted:</i>	
vii. <i>in the side setback, at a minimum 3m behind the front building line</i>	i. Complies, a queuing space setback of 10m is provided within the scheme.
viii. <i>a minimum 1m from the original building foundation</i>	ii. NA
ix. <i>where side setback requirements in the DCP are met;</i>	iii. Complies.
x. <i>only if a side gate is provided to hide the commencement of the excavated driveway slope.</i>	iv. The provision of a side gate as a part of the proposed scheme is to be confirmed.
19C.5 Building Design	
2. <i>Natural and recessive colour schemes are encouraged for rendered and painted finishes, especially on sites rated as neutral or uncharacteristic.</i>	The chosen materials of light feature face brick, timber soffits and white and bronze finishes present a natural, recessive colour scheme that is complementary to the predominantly Federation and Inter-war character of buildings in the HCA.
3. <i>Contemporary materials are permitted for new work where the detailing, proportions, texture and colour range blend with the existing character of the HCA.</i>	
10. <i>Materials used for new buildings are to be similar to, or compatible with, the original buildings in the HCA.</i>	
11. <i>Development applications for new buildings are to provide a material board and details of colour scheme and finishes.</i>	A material and finishes schedule have been prepared by PMDL and included in Figure 26.
12. <i>New buildings are to incorporate architectural language such as massing, proportions, coursing lines, materials and finishes, which</i>	The use of the podium element visually breaks down the proposed bulk and lessens the visual effect on the streetscape. The upper levels are be recessed to emphasise the human scale of the

are sympathetic to and complement the predominant character of the HCA.

podium level. The design features a modulating façade projection to visually establish the proposal as a small village rather than a singular monolithic build. Building B and majority of Building C will be hidden behind Building A, this reduces the impact of the massing on the surrounding context.

13. *New building colour schemes are not to detract from colour schemes in the streetscape and not to be in visual contrast with the colours of the contributory properties in the HCA. Recessive colours and traditional materials are preferred.*

The material and colour palette of the new building has been designed in a neutral palette, with a feature brick (running bond and soldier) to the primary façade along McIntosh Street. The neutral palette does not detract from the colour schemes in the streetscape. Further the use of brick at the street level is compatible with materials of the dwellings within the HCA.

A material and colour board (digital) was provided within the submission of this Development Application to comply with this provision.

Fencing

5. *New front fencing, pedestrian and vehicular access gates are to match the architectural style of the house and the character of the immediate streetscape*

The proposed design of the front fence, transitioning from a solid wall or fence to a lower-scale, free-standing fence with an approximate height of 1.2 metres. The fence height increases modestly where required to respond to the sloping topography. The front fence is proposed to be finished light colour sandstone to be consistent with the KDCP design objectives and is largely obscured by proposed plantings. The integration between the private and public domain has therefore been enhanced and the established garden character is better respected.

19F Development in the vicinity of Heritage Items or Heritage Conservation Areas (HCAs)

19F.1 Local Character and Streetscape

Built form;

2. Development on sites that either directly adjoin or are in the vicinity of a Heritage Item or an HCA is to have regard to:

- i. i. The form of the existing building or buildings including height, roofline, setbacks and building alignment;
- ii. ii. dominant architectural language such as horizontal lines and vertical segmentation;
- iii. iii. proportions including door and window openings, bays, floor-to ceiling heights and coursing levels;

Eryldene is characterised by a modestly scaled dwelling set centrally within an expansive, landscaped garden, where vegetation rather than built form defines its setting. While the proposed development introduces a taller built form, increased setbacks to the western boundary and stepped upper levels have been incorporated to ensure the development remains visually separated from Eryldene. The massing is arranged so that no single building presents as a continuous backdrop when viewed from within

- iv. iv. materials and colours;
- v. siting and orientation;
- vi. setting and context;
- vii. streetscape patterns.

the gardens, allowing the historic house to continue to be appreciated in relative isolation.

Eryldene and its associated structures display carefully considered proportions, with openings and elements scaled to human experience within the garden. In response, the proposed development incorporates recessed glazing, smaller window groupings and articulated façades, particularly at upper levels visible from Eryldene. These measures ensure the development does not read as a monolithic or visually overwhelming presence in the garden setting.

The material palette has been refined to respond to the subdued and natural tones evident within Eryldene and its garden structures. Warm brickwork, timber elements and muted metal finishes have been selected to sit comfortably within the surrounding vegetation. Brick balustrades and timber soffits further soften the appearance of upper levels, ensuring the development remains recessive when viewed from within the Eryldene gardens.

The siting of the three buildings has been deliberately arranged to increase separation from Eryldene and to maintain view corridors and sky exposure from within the gardens. Orientation and spacing between buildings reduce the perception of bulk and allow the development to be read as a series of discrete forms set behind vegetation, rather than a single dominant mass.

While Eryldene is not primarily experienced as a streetscape item, its approach and visual separation from McIntosh Street are important to its setting. The proposal reinforces the established garden character of McIntosh Street through generous front setbacks, deep soil zones and canopy planting, ensuring that views toward Eryldene remain framed by vegetation rather than built form.

Views:

4 New development in the vicinity of a Heritage Item or HCA is to demonstrate that it will not reduce or impair important views to and from the Heritage Item from the public domain.

The proposed development has been assessed in terms of views experienced both from within the gardens and from the surrounding public domain.

The significant garden of Eryldene is primarily appreciated from within its landscaped grounds, where the experience of the historic house, Chinese Pavilion, Moon Gate and associated garden spaces is framed by mature canopy trees,

hedges and layered vegetation. These landscape elements somewhat limit outward views and play a fundamental role in defining the visual setting of the place.

Visual impact testing undertaken from key viewpoints within the Eryldene gardens, including locations nominated by representatives of the Eryldene Trust, demonstrates that the proposed development is partly screened by existing vegetation, with only partial and distant visibility through breaks in the canopy. Where visible, the development is read in the background at a distance of approximately 40 metres and against a mixed backdrop of sky and vegetation, rather than as a continuous or dominant built form.

From the highly valued viewpoints, including views from the Chinese Pavilion, the Moon Gate and locations used for public events and ceremonies, the amended design ensures that the proposed buildings are visually broken up through increased setbacks, greater separation between buildings and a refined façade treatment. These measures increase visible sky between built forms and prevent the development from presenting as a solid backdrop. As a result, the Chinese Pavilion and surrounding garden elements remain the primary visual focus, with the development receding into the background.

Views to Eryldene from the public domain, including from McIntosh Street, are similarly framed by mature vegetation and garden planting, and are not reliant on long-range visibility of the house or garden elements. The proposal does not obstruct or diminish these views, and Eryldene continues to be experienced as a discrete heritage place set within a heavily landscaped setting rather than in direct visual association with new development.

6.3 Heritage NSW Guidelines

The table below provides an impact assessment of the proposal against the relevant questions posed in Heritage NSW's (former Heritage Office/Heritage Division) 'Statement of Heritage Impact' guidelines.

Table 4 Heritage NSW Guidelines

<i>Will the proposed works be the best conservation solution for the heritage item?</i>	The proposed development scheme is an acceptable solution for the subject site considering its proximity to the North Shore railway line and the consequent rising need for higher density residential complexes within the area. The proposed scheme is in line with the planned character of the area arising from Chapter 5 of the TOD SEPP. The significant plantings within the grounds of Eryldene will be conserved. No works are proposed within the heritage-listed garden, and existing mature trees and specimen plantings will be retained. Hydrology, groundwater and overland flow assessments confirm that the proposed development will not adversely affect water movement, drainage or soil moisture conditions within the garden. Together with increased setbacks, landscape buffering and limited overshadowing, these measures ensure the ongoing health, setting and visual prominence of the significant plantings are maintained.
<i>Will the works promote the ongoing use and upkeep of the item?</i>	The extant four dwellings are proposed for demolition as a result of the development. The proposal seeks to construct a residential development with an affordable housing component within the proximity of the local railway corridor as a result of Chapter 5 of the TOD SEPP.
<i>Are the proposed works part of a broader scope of works?</i>	N/A.
<i>Does this proposal relate to any previous or future works? If so, what cumulative impact (positive and/or adverse) will these works have on the heritage significance of the item?</i>	The proposed scheme in addition to further planned residential developments of a similar nature planned within the vicinity will serve to provide in demand residential accommodation solutions that are within the proximity of public transport options such as the North Shore railway corridor.
<i>Works adjacent to a heritage item or within the heritage conservation area (listed on an LEP)</i> <i>Will the proposed works affect the heritage significance of the adjacent heritage item or the heritage conservation area?</i> <i>Will the proposed works affect views to, and from, the Interpretation heritage item? If yes, how will the impact be mitigated?</i>	As assessed above, the proposed works adjacent to the State-listed heritage item Eryldene and in proximity to the Gordon Park and Gordon Park Estate, McIntosh and Ansell Heritage Conservation Areas will not adversely affect heritage significance. No works are proposed to any heritage item or contributory fabric within a heritage conservation area, and the development has been carefully designed to conserve setting, views and streetscape character.

Will the proposed works impact on the integrity or the streetscape of the heritage conservation area?

Views to and from Eryldene, including those experienced from within the gardens and from the public domain, have been tested and are filtered by existing and proposed vegetation, with increased setbacks, stepped building forms and separation between buildings ensuring the development reads as a background element rather than a dominant backdrop. The proposal will not compromise the integrity or streetscape character of the heritage conservation areas, with generous setbacks, a recessive material palette and substantial landscape planting reinforcing the established garden setting and leafy streetscape as the area transitions to higher density development.

7 Conclusion

The proposed development has been assessed to have an acceptable impact on the Gordon Park Estate, McIntosh & Ansell Conservation Area (C22) and the listed items in the vicinity. Key aspects of the proposal assessment are listed below:

- All houses which are within the subject site to be demolished are highly altered/pedestrian dwellings of no significance. Notably, the dwelling within the HCA dates from the 2000s and does not contribute to the character of the conservation area.
- The development scheme proposed for the subject site will establish a needed source of high-density residential living opportunities within the vicinity of multiple public transport corridors as per the provisions of Chapter 5 of the TOD SEPP.
- It is noted that the proposed building would be of a different scale and typology than that which currently exists. However, the proposal exists in a legislative context which will facilitate significant uplift of the same type in particular areas. The development would be in line with the planned future character of this area, notably the newly introduced TOD Housing SEPP update which allows for an increase in density within a greater radius from specified stations and town centres. The framework anticipates increased density and a transition in built form as part of the NSW Government's strategic planning framework. The proposal responds to this planned future character through a carefully moderated built form, incorporating appropriate setbacks, stepped massing and separation between buildings to manage scale, reduce perceived bulk and retain visual permeability
- The design of the proposed scheme is sensitive to the characteristics of the Gordon Park Estate, McIntosh & Ansell Conservation Area (C22) and the extant structures located on the subject lot. Note however that the bulk of the development would be located outside the HCA, with only its north corner extending into the edge of the HCA. The form, massing and materiality of the proposal is informed by the local visual context of the site's intersection location and its sloping topography, additionally the proposal respects the established setback pattern of the McIntosh streetscape.
- The subject site benefits from being a deep block extending south from McIntosh Street, meaning that the most visually impactful part of the development is confined to the shorter boundary of the site (i.e. the north boundary to McIntosh Street). Buildings B and C will be more recessive when viewed in the context of the street.
- The proposal has been developed with key design principles including a solid podium, glazing set deep back behind the line of the façade and substantial vegetation to ensure that its impacts on any adjacent existing property is minimised.
- The State listed heritage item to the west would be separated from the proposed development by the property at 19 McIntosh Street which is outside the subject site and is not identified to be of significance. The proposed development incorporates a podium, massing and materiality that mitigates visual impact on its surrounding however, the site location has the additional benefit of being physically separate from the heritage listed item.
- Eryldene is located towards the centre of its lot and is surrounded by a significant garden. The vegetation within and in front of the heritage listed site already largely screens views towards the subject site. The proposal conserves the setting of the State-listed heritage item Eryldene by maintaining visual separation, protecting important garden views and ensuring the development is read against a backdrop of sky and vegetation rather than as a continuous built form. The additional impact on views, in terms of the visibility of the new development behind (from the southeast) of Eryldene, is minor. There would be sufficient buffer around Eryldene to appreciate it in isolation.
- Overshadowing impacts to the Eryldene gardens are limited in extent and duration, occurring only in the early morning during winter and affecting a small portion of the eastern boundary, with no adverse impact on the viability or sustainability of the internationally significant camellia collection. Hydrology, groundwater and overland flow assessments confirm that the development will not adversely affect drainage patterns, soil conditions or water availability within the Eryldene gardens or surrounding heritage areas.
- A considered approach to vegetation will be included within the scheme to retain street trees where possible and respect the character of the Heritage Conservation Area's streetscape. Large mature tree plantings along McIntosh Street and Werona Avenue will be prioritised to create continuity with the

character of surrounding streetscape and to maintain the character of views towards Eryldene. Refer to section Visual Context in Section 5.

- The material palette and façade articulation respond sympathetically to the surrounding heritage context, using predominantly warm, earthy brick tones, timber elements and recessive finishes to ensure the development sits comfortably within its landscaped setting.

Recommendations/Mitigation Measures

- Appropriate vibration management measures are required to be documented in the Construction Management Plan prior to the issue of a Construction Certificate (CC) to mitigate potential dilapidation impacts on nearby significant site

8 Bibliography & References

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NSW Planning Portal ePlanning Spatial Viewer, available at <https://www.planningportal.nsw.gov.au/spatialviewer/#/find-a-property/address>.

[Note: Some government departments have changed their names over time and the above publications state the name at the time of publication.]

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

Appendix A Urbis Response to Submission

15 May 2026

Nsw Department of Planning, Housing and Infrastructure

Att: Max Tran

Email: max.tran@dpie.nsw.gov.au.

To whom it may concern,

RtS – 21–25 McIntosh Street & Werona Avenue, Gordon – Heritage Impact Statement

1 Introduction

This letter has been prepared as an attachment to the revised Heritage Impact Statement (HIS). This letter explains how heritage-related comments raised in submissions from the Department of Planning, Housing and Infrastructure (DPHI), the Department of Climate Change, Energy, the Environment and Water (DCCEEW) – Heritage Council of NSW, and Ku-ring-gai Council in relation to SSDA Application SSD-83478456 have been addressed.

This letter should be read in conjunction with the HIS which has been updated to respond to the revised scheme. The letter has been finalised to reflect comments received through a peer review of the letter by NBRS Heritage. Updates to the HIS have also been made in response to that review.

The application was lodged by CPMD Pty Ltd on July 2025 seeking development consent for residential development, including in-fill affordable housing at 21,23 & 25 McIntosh Street and 55 Werona Avenue, Gordon, the application included:

- Demolition of four buildings in the subject site.
- Removal of ancillary buildings such as garages/sheds.
- Removal of vegetation within the subject site lots.
- Construction of three towers (Buildings A, B and C) 8 storeys (including a roof level), installation of solar panels on the roof of Building B.
- Two levels of basement carpark.
- Retention of vegetation along the streetscape, new plantings on the roof top levels and at sections of the elevations of Buildings A and B. New plantings between the building spaces and connecting pathways.

2 Design Amendments

In response to the submissions, (in relation to heritage and other disciplines) and in consultation with the Eryldene Trust the design of the new development has been amended. These amendments are listed below and shown in a selection of photomontages, compared with the original proposal.

- Floor layouts within Buildings A and B have been reconfigured at each level to accommodate significantly increased western side setbacks. Building C has also been comprehensively redesigned to achieve compliance while enhancing overall design quality and amenity.
- The space between Buildings A and B has been partially infilled up to Level 3, with additional communal open space (COS) provided on Level 4. Additional 3-bedroom units are proposed within this infill area.
- Further reconfiguration has been undertaken across each floor level to accommodate the additional side setbacks.
- The unit mix has been revised, with 1-bedroom units reduced from 18 to 8, 2-bedroom units reduced from 84 to 68, 3-bedroom units increased from 60 to 63, and 12 new 4-bedroom units introduced.
- Basement layouts have been reconfigured to accommodate updated cores location, additional lifts, resulting in a reduction in total parking from 190 to 178 spaces.
- Bicycle parking has been reduced from 178 to 166 spaces.
- The overall affordable housing component has increased from 3,285 sqm to 3,293.11 sqm.
- Design updates include materials with earthy tones, including brick balustrades up to the fourth floor, with bronze accents and timber ceilings continuing through the upper levels to reinforce and unify the existing character of the area.
- Additional material changes include a revised palette incorporating masonry, glass, and lighter metal finishes.
- Amendments to the unit mix have reduced the total number of dwellings from 162 to 151.
- The landscaping scheme has been revised, with enhanced planting along the McIntosh Street frontage and the western side setback adjacent to 19 McIntosh Street and the Eryldene Historic House heritage item.



Picture 1 Rosedale Road Looking south – Proposal as lodged (May 2025)

Source: Gyde, 2026.



Picture 2 Rosedale Road looking south – Updated proposal (March 2026)

Source: Gyde, 2026.



Picture 3 McIntosh Street looking north – Proposal as lodged (May 2025)

Source: Gyde, 2026.



Picture 4 McIntosh Street looking north – Updated proposal (March 2026)

Source: Gyde, 2026.

3 Overview of Consultation with Eryldene Trust

On 17th October 2025 the Proponent and Gyde met with The Eryldene Trust to discuss the comments they made in their submission and potential next steps. The following matters were raised by Eryldene:

- **Further Architectural Articulation**– Greater articulation is required in the building design to reduce visual bulk, improve legibility of form, and ensure the development sits more comfortably within its setting.
- **Importance of Material Selection** – Materiality was highlighted as a critical consideration, with an emphasis on materials that are appropriate to a heritage-adjacent context. The Trust stressed that all

external materials should be of high quality and durable. The Trust encouraged the use of recessive, muted materials to minimise visual impact and allow Eryldene and surrounding heritage elements to remain prominent. The overall scale of the development and its materials must be carefully considered together to ensure the building does not dominate or detract from the heritage setting.

- **Site Masterplan and Precinct Context** – A broader site masterplan and explanation of how the development relates to the wider precinct is required, including pedestrian movement, landscape structure, and relationship to neighbouring properties.
- **Concept Design Timeframe** – The Trust indicated that a revised or refined concept design should be provided for further consideration.
- **Stormwater and Groundwater Management** – Clear information is required on stormwater strategy, groundwater conditions, and how water impacts will be managed to avoid adverse effects on Eryldene.
- **Review Period for Eryldene** – The Trust requested that a minimum of two weeks be allowed for Eryldene to review any updated plans, reports, or design material once submitted.
- **Replacement of Tree 19** – An Ironbark tree is to be planted as a replacement for Tree 19, reinforcing the importance of appropriate species selection and landscape continuity.
- **Responsiveness to Context** – The proposal should clearly demonstrate how it responds to its immediate and broader context, including heritage, landscape, and neighbourhood character.
- **Vertical Articulation** – Additional vertical articulation is required to break down building height and mass, improving visual permeability and reducing perceived scale.

Following the October meeting, two further meetings were held in February and March with the Eryldene Trust to present the amended scheme and respond to queries. In addition to these meetings, technical documentation and supporting material were provided to the Trust to facilitate feedback. A site visit to Eryldene House was also undertaken with representatives of the Trust to identify appropriate viewpoints for the visual impact assessment and to enable the consultant team to better understand the site context. The Proponent will continue to engage with the Trust as the SSDA progresses.

The matters outlined above are reflected in the agency submissions, which are addressed in the responses set out below.

4 Response to Submissions

Extracts containing heritage feedback from the Heritage Council of NSW approval committee (4 September 2025) and Ku-ring-gai Council Agency Advice letter (11 September 2025) are reproduced below (***italicised and bolded***) and the Urbis Heritage response comments provided below each comment in standard text.

4.1 Heritage Council of NSW Approvals Committee

4.1.1 Response to Comment – Local Character

Note that the proposed design concept for Residential Development 21, 23 & 25 McIntosh Street and 55 Werona Avenue, Gordon – SSD-83478456 does not respond to the local character and there needs to be an alternate and sympathetic design approach.

Urbis Response

The term “character” in this case is interpreted to include heritage values.

It is recognised that as a higher density development, facilitated by planning reforms, the development will not have a direct relationship with the existing character of the area. Instead, the proposal relates to the strategically planned future character of the broader area and more appropriately takes architectural cues from the existing development, applied in a contemporary way to a higher density building. The revised development proposal better responds to the local character of the area. These amendments include:

- The introduction of brick balustrades at the fourth floor and timber ceilings to better complement the existing character of the area.
- Additional material changes and revised palette to incorporate masonry, glass and lighter metal finishes, again complement the existing character of the area.
- Revised landscaping scheme with enhanced planting along McIntosh Street, to retain the leafy streetscape characteristic.
- Additional planting along the western side setback adjacent to 19 McIntosh Street. The plantings will act as an additional buffer between the new development and 19 McIntosh Street and add a level of privacy.
- Floor layouts within Buildings A & B have been reconfigured at each level to accommodate significantly increased western setbacks. The increased western setbacks reduce the impacts of the development on the nearby heritage item Eryldene.

4.1.2 Response to Comment – Impact on Eryldene

Advise DPHI that the proposed SSD will adversely impact the State Heritage Register (SHR) listed Eryldene, which is internationally recognised for the significance of its house and gardens.

Advise that the bulk and scale of the proposed SSD would make it prominent and intrusive from within Eryldene’s garden and diminish the experience of this exceptionally significant garden and its associated structures and buildings. It would also adversely impact on the wider context and setting of the place.

Urbis Response

The amended design incorporates increased setbacks to the west boundary of the subject site and an increased separation between the three buildings, reducing the visual bulk of the development when viewed from Eryldene. Existing vegetation, together with additional proposed landscaping within the western setbacks, further limits visibility and moderates the perceived bulk and scale of the development.

The front setback landscaping has been amended to incorporate a diverse mix of tall canopy trees, layered understory planting, and a combination of evergreen and exotic ornamental species which better align with the established garden character and setting of the surrounding area, and to enhance the integration between the public and private domain.

Changes to the façade of Building A, along with the increased setbacks and the introduction of brick and timber elements, ensure the development responds sympathetically to the surrounding streetscape and its setting. As illustrated in the images below, the revised design presents more modestly within the Eryldene

context, with reduced height and smaller glazing elements contributing to a less visually dominant appearance.



Picture 5 McIntosh Street looking north – Proposal as lodged (May 2025)

Source: Gyde, 2026.



Picture 6 McIntosh Street looking north – Updated Proposal (March 2025)

Source: Gyde, 2026.

In March 2026, Gyde and a professional photographer inspected Eryldene in the company of a representative of the Eryldene Trust, who nominated views and viewing angles known to be valued by members of the public and by guests leasing the venue for private functions. Figure 1, below shows the locations of the key viewing areas identified from within the gardens. The impact on these views was tested and the development revised as outlined above to minimise impacts. And outline of the effects on these views is provided below.

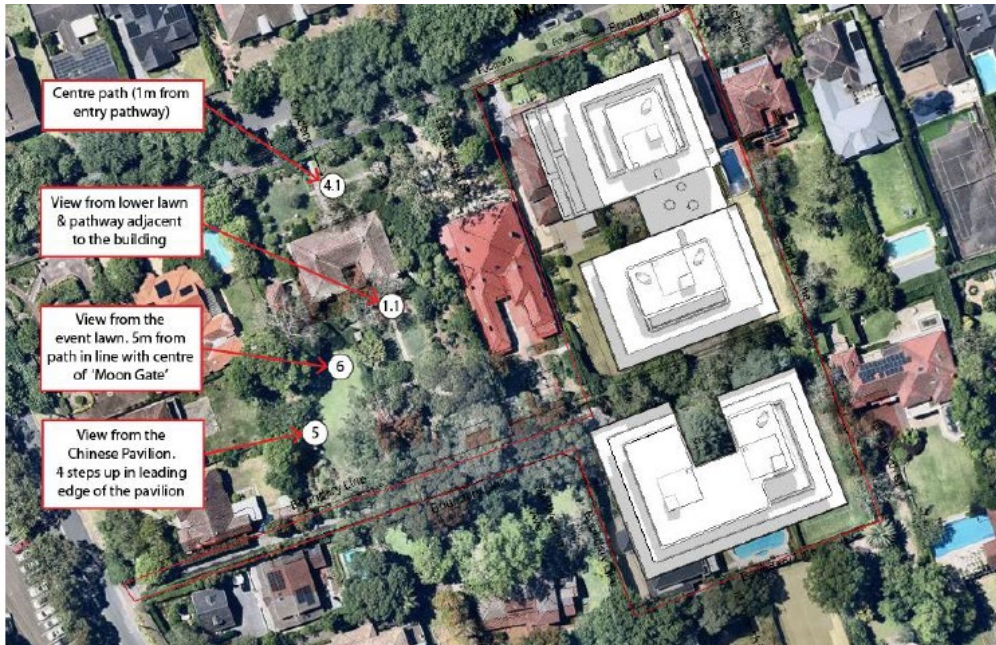


Figure 1 Eryldene Estate views, showing four key viewpoints capture by Gyde.

Source: Gyde, 2026.

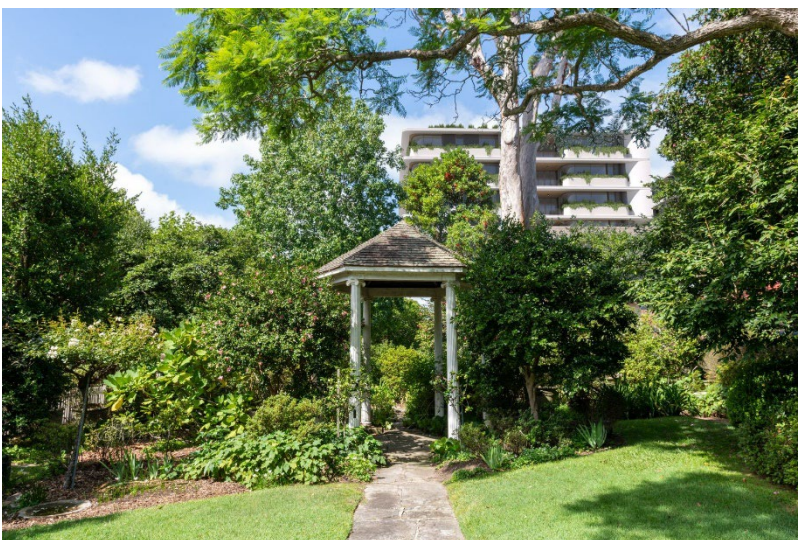
View 1.1 is from a location identified by a Eryldene Trust member as a spot which is leased for private functions, this view faces west towards the proposed development. Mature landscaping defines the eastern boundary of Eryldene, at this spot Building B will be partly visible in the background. View lines to Building A and C are largely concealed by existing landscaping. The amendments to the design ensure the degree of exposure of Building B is mitigated by the viewing distance (approximately 40m) and by the separation between the built forms to maintain a reasonable level of sky exposure.



Picture 7 View 1.1 showing the proposed development (updated proposal) Building B.

Source: Gyde, 2026.

View 4.1 also facing east, Building A is partly visible in the distance through the gap in the canopy. While new fabric introduces increased scale, it does not significantly obstruct the visible sky component, nor does it reduce the significance or character of the gardens. The position behind the existing canopy lessens its potential to become a visually dominant new focal point.



Picture 8 View 4.1 showing the proposed development (updated proposal) largely hidden by landscaping.

Source: Gyde, 2026.

View 5, facing east from the Chinese Pavilion within the Eryldene garden, is identified by Eryldene staff as a highly valued viewpoint and a primary setting for wedding ceremonies. From this location, sections of the three proposed buildings are visible. However, recent design amendments, have broken up the built form and increased sky exposure around the development.

This design response ensures the significant elements are read against a mixed backdrop of sky, mature trees and vegetation, rather than as a continuous wall of built form. The established trees along the eastern boundary continue to dominate the view and obscure parts of the proposed buildings, reducing their visual prominence and ensuring the Chinese Pavilion remains the focal element within this significant garden.



Picture 9 Existing view.

Source: Gyde, 2026.



Picture 10 View showing the proposed development (updated proposal).

Source: Gyde, 2026.

View 6 looking east towards the 'Moon Gate', which is a landscape feature shaped as a circular portal in the hedge plantings separating the two lawn areas. The Moon Gate is commonly used as an entrance for functions. From this viewpoint Building B is partly visible in the distance, while Buildings A and C are visually screened by the landscaping. The changes in the built form, neutral palette and the significant vegetation in the listed curtilage ensures the new development would not be a dominant focal point in the background. The neutral palette and the development are similar in tone to the pavilion.



Figure 2 Existing view looking east towards the 'Moon Gate'.

Source: Gyde, 2026.



Figure 3 View looking east showing the proposed development (updated proposal) in the background.

Source: Gyde, 2026.

4.1.3 Response to Comment – Overshadowing Erydene's Garden

Advise DPHI that overshadowing of Erydene's garden would have an adverse impact on the viability and sustainability of the vegetation, resulting in an adverse heritage impact, especially on the unique and internationally recognised camelia collection.

Urbis response

The amended design changes with the increased setbacks between the three buildings have reduced the overshadowing impacts on Erydene. The predicted overshadowing impacts to Erydene in the winter months will predominantly be around 9am and only shadow a small portion of the eastern boundary and only for a small window of time.

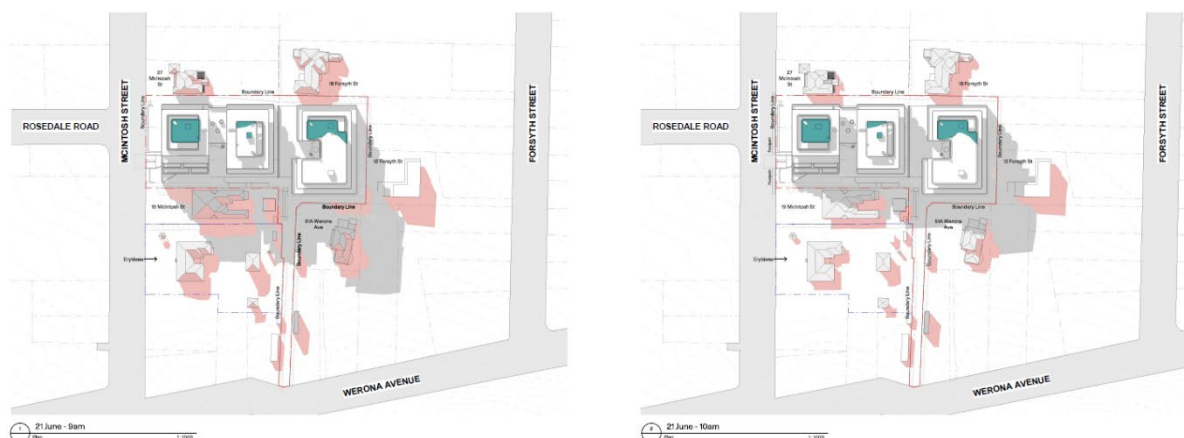


Figure 4 Shadow study (for updated proposal) – winter solstice showing the shadow impact to Eryldene limited to the eastern corner and only for a small timeframe.

Source: PMDL, 2026, sheet no. DA5070, Rev. C.

4.1.4 Response to Comment – Reduction in Height

Recommend that the SSD be re-conceptualised to substantially reduce the height of buildings in locations A and B by at least three stories to reduce the visual impacts of the setting and amenity of Eryldene and alleviate overshadowing.

Urbis Response

The visual impacts and overshadowing from the proposed development on Eryldene and its existing setting have been mitigated through increased setbacks to the western boundary of the subject site, and additional planting along this boundary to provide some visual screening. These measures reduce visual impacts from Eryldene Gardens towards the development. Further, the increased setbacks between the buildings have reduced overshadowing impacts on Eryldene. As noted above, the main overshadowing will occur during the winter months for a limited period of one hour and will be confined to a small section of the garden along the eastern boundary. Refer discussion below regarding impacts on the health of the plantings in the grounds of Eryldene.

4.1.5 Response to Comment – Canopy Replenishment

Recommend that the revised scheme should include large trees for canopy replenishment, particularly along the site's south-western boundary to provide visual screening.

Urbis Response

The amended scheme retains 7 existing large trees positioned along the existing driveway to 55 Werona Avenue, while other large trees to the south-west and north-east are also being retained. The amended landscape design includes 12 large canopy trees within deep soil zones and 30 medium trees within deep soil zones. The enhanced deep soil in the front setback will include a mixture of:

- Syncarpia glomulifera (commonly known as Turpentine tree).

- *Angophora costata* (commonly known as Sydney red gum).
- *Nyssa sylvatica* (commonly known as tupelo).
- *Zelkova serrata* (commonly known as Green vase).
- *Lagerstromias*. (commonly known as Crepe myrtle).
- *Malus*.

Additional planting along the McIntosh Street frontage has been strengthened to reinforce canopy cover and the existing landscape character. In addition, the increased western setback allows for the inclusion of larger deciduous canopy trees, providing effective visual screening between the proposed development and Eryldene Gardens.

4.1.6 Response to Comment – Photomontage Testing

Recommend that any proposal should be tested with photomontages in relation to context, setting, and views within and around Eryldene.

Urbis Response

Gyde and a professional photographer have prepared photomontages of the proposed development, reproduced above in this section. The design amendments, informed by further testing of visual impacts from the Eryldene garden and along McIntosh Street, have improved the presentation of the development and reduced its visual impact when viewed from surrounding public and heritage-sensitive locations as identified by the users of the significant item.

Oblique views along McIntosh Street demonstrate a reduction in perceived bulk as a result of increased setbacks and the retention of mature tree screening. Changes to the lower levels, including the introduction of wide horizontal banding, contribute to a more cohesive and visually ordered built form. When viewed from the west, the increased setbacks maintain views towards Eryldene and preserve the leafy character of the streetscape.

From within Eryldene all viewpoints, mature trees, hedges and specimen plantings play a significant role in screening the development however the design has been revised to increase the amount of visible sky in keys from to the north. Buildings A, B and C are variously partially visible or largely concealed, with Building B most seen and Buildings A and C often screened. Where visible, the new buildings appear at around 40 metres and are seen against open sky rather than dominating the foreground.

While the proposed development represents an increase in scale compared to existing conditions, it primarily remains within permitted height controls. Design amendments have improved sky exposure and visual relief. The built form proportions and façade treatment are described as reading a collection of individual elements rather than continuous bulk.

The assessment also recognises how the estate is used for weddings, performances and other events. Most guests' views are directed towards the Chinese Pavilion, although east-facing views from within the pavilion are valued during ceremonies. Overall, the material concludes that the development does not significantly obstruct key views, interfere with the legibility of heritage elements, or substantially diminish the visual experience of the Eryldene Estate.

4.1.7 Response to Comment – Expert Assessment of Impact on Camellias

In addition the Approvals Committee is concerned that the potential impacts of the SSD on the significant vegetation within the gardens of Eryldene, including its internationally significant collection of camellias, has not been adequately assessed in the EIS, including impacts related to overshadowing and changes to ground water hydrology. We recommend that additional expert assessment be provided in this regard.

Urbis Response

An Overland flow assessment undertaken by Hydracor Consulting Engineers concluded that the proposed development will not have an adverse impact on surface flows over the Eryldene Historic House and Garden.¹ This conclusion is based on the recommendation that the 'axe handle' (Werona Avenue driveway) retain existing levels to maintain the existing overland flow path. The proposed development will not remove or alter the existing driveway; therefore, the overland flow to the gardens will not be impacted by the proposed development.

Further hydrology assessments concluded that the basement excavation associated with the proposed development will not impact the groundwater in the area and is approximately 25 metres from Eryldene Gardens.

Advice received from Studio IZ confirms that camellias have a shallow root system and primarily rely on surface soil moisture from rainfall or irrigation.² They are not dependent on deep groundwater or water tables. As a result, any potential changes to groundwater hydrology arising from the proposed development would not affect the water source for the camellias.

The amended design changes have reduced the predicted overshadowing impacts to Eryldene in the winter months will predominantly be around 9am and only shadow a small portion of the eastern boundary and only for a small window of time.

The increased western setback has been done to accommodate larger deciduous canopy trees which respond to the established garden character of the Eryldene Gardens.

4.2 Ku-ring-gai Council – D Heritage

Heritage Objectives

The heritage provisions of KLEP 2015 under Clause 5.10 set the objective “to conserve the environmental heritage of Ku-ring-gai”. A further objective set by the LEP is “to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views”. These objectives follow the standard instrument established by the NSW Government SEPP.

The Ku-ring-gai Development Control Plan (KDCP) sets further detailed objectives and controls to implement the objects in KLEP 2015 in relation to conserving significance, fabric, setting and views for heritage conservation areas and heritage items.

¹ Hydracor Consulting Engineers 2026, Proposed Residential Development Overland Flow Assessment, prepared for Werona Ave Residence Holdings Pty Ltd.

² IZ 2026, General advice – Camellia Root System and Water Requirements, advice prepared for CPDM c/o Ross Norton.

Urbis Response

The heritage objectives of Clause 5.10 of KLEP 2015 are acknowledged, including the objectives to conserve the environmental heritage of Ku-ring-gai and to conserve the heritage significance of heritage items and heritage conservation areas, including their associated fabric, settings and views. The proposal has been assessed against these objectives and the more detailed controls set out in the KDCP.

The proposed development does not involve the removal of any heritage items or contributory buildings within heritage conservation areas. No significant heritage fabric is proposed to be removed, and the historical significance of surrounding Federation and Inter-war housing within the Gordon Park and Gordon Park Estate, McIntosh and Ansell Heritage Conservation Areas are retained.

The amended design responds to KDCP objectives by conserving the setting and views of nearby heritage items and conservation areas. Increased setbacks, stepped building forms, greater separation between buildings and retention of existing mature vegetation reduce perceived bulk and ensure the development does not visually dominate the heritage context. Key view lines, sky views and the established garden character of McIntosh Street and surrounding heritage areas are maintained.

The landscape strategy reinforces the leafy character of the locality and provides effective buffering to heritage interfaces, consistent with KDCP controls relating to landscape and streetscape character. The refined material palette, comprising predominantly warm, earthy brick tones and timber elements, ensures a recessive and sympathetic response to the surrounding heritage fabric.

Accordingly, the proposal is consistent with the heritage objectives of Clause 5.10 of KLEP 2015 and the detailed heritage provisions of the KDCP, and conserves the heritage significance, fabric, settings and views of nearby heritage items and heritage conservation areas.

4.2.1 Response to Comment – Transport Orientated Development

The Guidance to Transport Oriented Development guide by the NSW Department of Planning, Housing and Infrastructure published May 2024 Page 11 states:

Development applications in heritage conservation areas

Any new apartment buildings proposed in an HCA should be appropriate to the context, and build upon the features of the HCA, whilst delivering increased housing density.

Consent authorities will still be required to assess the application under clause 5.10 of their LEP. The clause 5.10 assessment will determine if the proposed new development satisfactorily addresses the significance of the HCA and any adjoining items and will need to determine that the HCA is not adversely affected by the proposed infill development. It is intended that the consent authority considers the character of the HCA and have regard to aim of increased housing density and change in built form as the area transitions over time.

Design guidance for developments with heritage considerations

...

The guide outlines the steps needed to ensure our heritage places are conserved, maintained and enhanced through good design, while realising good development outcomes.

Urbis Response

This has been noted.

It is acknowledged that the proposed development is mapped as a TOD and is situated within an existing low-rise residential area, which is generally one to two storeys in height. Any new built form of increased height beyond the existing character may be perceived as currently uncharacteristic in relation to the HCA. The challenge for the new development is to increase housing availability within Gordon while best responding to the characteristic elements of the HCA.

The amended design has introduced increased setbacks and reduced the perceived bulk between the three buildings. This ensures open skyline views and provides sufficient setbacks to support an enhanced garden setting and landscape screening. The horizontal banding at the lower levels of Building A creates a more cohesive façade and, when paired with the increased setbacks, results in a development that is less visually intrusive. The overall palette and materiality further support this outcome.

It should also be considered that the street and front boundary landscaping in the LGA and specifically on McIntosh Street substantially contributes to the character and cohesion of the area. This is particularly true on McIntosh Street. As shown in the views reproduced above in this response, the retention of these street trees and proposed supplementary trees ensure that the development on the site, like much of the residential development in the area, is notably obscured by trees which remain the dominant streetscape feature.

4.2.2 Response to Comment – Low and mid-rise policy

The secretary of the Department of Planning, Housing and Infrastructure stated in publicly available correspondence to Members of Parliament that Clause 5.10 of a Standard Instrument LEP continues to apply to development made under the provisions of SEPP (Housing) 2021 and must be considered in the assessment of those applications.

Urbis Response

The proposed development is not within a Low and mid-rise area.

4.2.3 Response to Comment – Contributory Properties

What is a Contributory Property?

KDCP Definition – Section B Part 19

The introduction section of Part 19 states:

This Part of the KDCP identifies various controls that specifically apply to contributory properties. For the purpose of this DCP, Contributory Properties are buildings and sites within a HCA which are deemed to exhibit one or more of the following characteristics:

i) buildings and sites that make an important contribution to the character and significance of the HCA. They can be from a key historical layer, true to an architectural type, style or period, or highly or substantially intact including their garden setting. Where subdivision has occurred, the subdivision is within the key historical period or the area.

ii) buildings and sites which are altered from their original form but are recognisable and could be reasonably reinstated to that condition or the alterations are not considered to be detrimental to the

integrity of the building; for example, a building that has been rendered or painted or where the roof cladding has been replaced but the form is otherwise legible.

iii) buildings and sites with new layers/additions sensitive to the style, form, bulk, scale and materials of the original building.

Note: Contributory buildings do not necessarily need to be high-quality buildings but should represent the key historical period of the HCA. An HCA may also contain high-quality buildings which are not necessarily from the key historical period.

Urbis Response

The above commentary noting the definition of contributory buildings within the KDCP is acknowledged. Further advice provided by Ku-ring-gai Council confirms that 25 McIntosh Street is identified as a neutral building within the HCA. As 25 McIntosh Street is the only property within the subject site that is located in an HCA and is already noted by Council as a neutral building, the definition of a contributory building is not relevant to the proposed development.

4.2.4 Response to Comment – Proposed development

The proposed development will have an unacceptable impact on the Gordon Park Conservation Area (C17) and the Gordon Park Estate, McIntosh and Ansell Conservation Area (C22) as well as heritage items in the vicinity at No. 17 McIntosh Street, Nos. 49 and 51 Werona Avenue and No. 4 Forsyth Street Gordon.

Urbis Response

As noted in this HIS, the design amendments have been developed to mitigate or reduce impacts on the surrounding HCAs and nearby heritage items. The increased setbacks between the buildings create opportunities for open sky views and reduced visual impact when viewed from Eryldene and the Gordon Park CA.

The updated photomontage demonstrates that the development, as viewed from 49 and 51 Werona Avenue, will not be visible due to existing landscape screening (Picture 11).



Picture 11 Photomontage prepare by Gyde showing the proposed development (updated proposal) will be not visible from Werona Avenue.

Source: Gyde, 2026.

4.2.5 Response to Comment – Demolition of Buildings

(1) Demolition of existing buildings at Nos. 21, 23 and 25 McIntosh Street and No. 55 Werona Avenue, Gordon.

The proposed works will result in the demolition of Nos. 21 and 23 McIntosh Street and 55 Werona Avenue which are not located in an HCA but are in the vicinity of HCAs and some heritage items.

No. 21 –23 McIntosh Street

The proposed demolition of this building and garden and the construction of a multi-storey residential flat building does not satisfy the objectives of KLEP 2015 to conserve the heritage significance of the conservation area and heritage items in the vicinity in terms of loss of a residential property and the introduction of a detracting building in close proximity of conservation areas and heritage items.

Urbis Response

The concern regarding the proposed demolition and construction of a multi-storey residential flat building is noted. However, it is considered that the proposal is an acceptable response to the Ku-ring-gai Local Environmental Plan 2015 in relation to the conservation of heritage significance.

21 and 23 McIntosh Street are not heritage items and are not located within a HCA. While 21 McIntosh Street adjoins the Gordon Park Conservation Area, its contribution to the significance of the CA has been substantially diminished due to extensive alterations and additions. Similarly, 23 McIntosh Street has undergone significant modification, resulting in the loss of its original built form and heritage character. As such, the removal of these buildings does not represent the loss of contributory fabric within a conservation area.

It is acknowledged that the demolition of the existing dwellings results in the loss of single residential buildings; however, the site is located within an area identified for increased housing density. The proposed development responds to this strategic context by increasing housing supply while incorporating design measures to minimise heritage impacts. These measures include increased setbacks, reduced perceived bulk, and landscape treatment to provide appropriate separation from nearby heritage items and conservation areas.

4.2.6 Response to Comment – 55 Werona Avenue

The proposed demolition of this potential heritage item and the construction of a multi-storey residential flat building does not satisfy the objectives of KLEP 2015 to conserve the heritage significance of the conservation area and heritage items in the vicinity in terms of loss of a potential heritage item and the introduction of a detracting building in close proximity to conservation areas and heritage items.

The house and grounds have the potential for heritage listing. The proposed demolition of the house and grounds will have an adverse and detrimental impact on the conservation areas and heritage items in the vicinity and is not acceptable from a heritage perspective.

Urbis Response

The heritage concerns raised by Council are acknowledged. However, it is considered that the proposal is consistent with the objectives of KLEP 2015 to conserve the environmental heritage of the area.

55 Werona Avenue is not a listed heritage item and is not located within a HCA. While the site adjoins the Gordon Park HCA, historical assessment demonstrates that the original pre-1930 dwelling and its grounds have been substantially altered through a series of approved works, resulting in a significant loss of integrity and heritage fabric. On this basis, the house and grounds are not considered to meet the threshold for heritage listing, and their demolition will not result in the loss of a heritage item or contributory fabric within a conservation area.

The proposed development has been designed to conserve the heritage significance of nearby conservation areas and heritage items by minimising visual and physical impacts. This is achieved through increased setbacks, retention of existing mature vegetation, and enhanced landscape screening. As a result, the multi-storey building will not be visually dominant or detracting when viewed from adjacent heritage items, including *Eryldene*, or from within the Gordon Park HCA.

Accordingly, the proposal is not considered to have an adverse impact on the heritage significance of conservation areas or heritage items in the vicinity and is consistent with the heritage conservation objectives of KLEP 2015.

Notwithstanding this, and in recognition of Council's concerns, a photographic archival recording of the dwelling and grounds is recommended prior to demolition, in accordance with relevant heritage guidelines.

4.2.7 Response to Comment – No. 25 McIntosh Street

The proposed demolition of No. 25 McIntosh Street, Gordon is located in an HCA and is in the vicinity of HCAs and some heritage items.

Even though this house is neutral in the HCA, its proposed demolition and construction of a multi-storey residential flat building does not satisfy the objectives of KLEP 2015 to conserve the heritage significance of

the conservation area and heritage items in the vicinity in terms of loss of a residential property and the introduction of a detracting building in close proximity to conservation areas and heritage items.

Urbis Response

25 McIntosh Street is located within a HCA; however, Council has identified the dwelling as a neutral building within the HCA. The dwelling has been subject to extensive contemporary alterations and additions, particularly to the primary façade, which are not sympathetic to the original style, form, scale or materials. As a result, the building does not contribute to the heritage significance of the HCA.

While it is acknowledged that demolition will result in the loss of an existing residential building and its replacement with a high density building, the result is not considered to necessarily be detracting in the context of the conservation area. The proposed development is of a high quality design and has been amended to ensure that the heritage significance of the conservation area and nearby heritage items is conserved, consistent with the objectives of KLEP 2015.

The amended design incorporates increased setbacks and a reduction in the bulk of Buildings A and B to minimise visual dominance and ensure the development does not detract from the surrounding heritage context. Existing landscaping, including mature vegetation within the grounds of *Eryldene* and along site boundaries, is retained to further reduce visual impacts when viewed from nearby heritage items and within the HCA.

In addition, the proposed scale, form and material palette have been selected to respond to the established heritage character, with neutral tones and materials that are recessive in the landscape and largely screened by existing tree canopies. When considered in this context, the proposal is not considered to introduce a detracting building in close proximity to conservation areas or heritage items and is consistent with the heritage conservation objectives of KLEP 2015.

4.2.8 Response to Comment – Setting and View Impacts

Clause 5.10 Heritage conservation

The objective under Clause 5.10 of KLEP 2015 states “to conserve the environmental heritage of Ku-ring-gai”. A further objective set by the LEP is “to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views” (emphasis added).

Urbis Response

The proposal is consistent with the objectives of Clause 5.10 of KLEP 2015 to conserve the environmental heritage of Ku-ring-gai and to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views.

The proposed development does not involve the removal of any items of significant heritage fabric within the HCA. None of the buildings proposed for demolition are heritage items or identified as contributory buildings. While 25 McIntosh Street is located within the HCA, Council has identified the dwelling as a neutral building and it does not contribute to the heritage significance of the conservation area.

The amended design has been developed to conserve the setting and important views associated with nearby heritage items, particularly *Eryldene*. Increased setbacks and greater separation between the three buildings reduce perceived bulk and mitigate impacts on key view lines from within the gardens. Increased

setbacks to the western site boundary also provide visual relief above the podium when viewed from the public domain and allow for additional landscaping, reinforcing the established leafy streetscape of McIntosh Street.

No works are proposed to heritage items in the vicinity of the site. Other than the neutral building at 25 McIntosh Street, no properties within the HCA are proposed to be removed. The proposed material palette has been selected to respond sympathetically to the surrounding heritage context, with neutral tones that reflect materials evident within *Eryldene* and remain recessive within the landscaped setting.

Accordingly, the proposal conserves the environmental heritage of Ku-ring-gai and the heritage significance of nearby heritage items and conservation areas, including their associated fabric, settings and views, consistent with Clause 5.10 of KLEP 2015.

4.2.8.1 Response to Comment – Burra Charter

The Burra Charter – the Australia ICOMOS charter for the conservation of places of cultural significance – is the key document guiding conservation practice in Australia. Article 8. Setting of the Burra Charter states:

“Conservation requires the retention of an appropriate setting. This includes retention of the visual and sensory setting, as well as the retention of spiritual and other cultural relationships that contribute to the cultural significance of the place.

New construction, demolition, intrusions or other changes which would adversely affect the setting or relationships are not appropriate.

Urbis Response

The proposal has been assessed against the Burra Charter, including Article 8, which requires the retention of an appropriate visual and sensory setting and seeks to avoid new work that would adversely affect cultural relationships or significance.

The proposal does not involve the removal of any heritage items or contributory heritage fabric. The only building within the HCA proposed for demolition is identified by Council as a neutral building and does not contribute to the cultural significance of the Gordon Estate, McIntosh and Ansell HCA. All heritage items in the vicinity are retained.

The amended design has been developed to retain the visual and sensory setting of the HCA. Increased setbacks, reduced bulk, greater separation between buildings and the retention of existing mature landscaping minimise visual intrusion and ensure the development is recessive when viewed from McIntosh Street, the Gordon Park HCA and nearby heritage items, including *Eryldene*. These measures maintain important views, landscape character and the established leafy streetscape that forms part of the setting of the conservation area.

While the proposal introduces new built form, it does not adversely affect the setting or cultural relationships of the surrounding heritage items and conservation areas. The development is clearly identifiable as new work, yet has been designed to respect and minimise impacts on cultural significance, consistent with Articles 8 and 22.2 of the Burra Charter.

4.2.8.2 Response to Comment – Setting for the HCA

The low-density residential character of the HCA including a number of heritage items contributes to the significance of the locality. The proposed bulk and scale of the 8 storey residential flat building facing the street with two separate 8 storey residential flat buildings behind will result in drastic, adverse and irreversible change to the setting of the Gordon Park Conservation Area (C17) and the Gordon Park Estate, McIntosh and Ansell Conservation Area (C22) and nearby heritage items and is not acceptable. It will visually dominate and detract from the setting of this area.

The overall impact of the proposed development will have a high degree of visual impact to the setting of McIntosh Street due to the notable increase in scale. The setting of McIntosh Street is characterised by a mix of single storey Federation and Interwar housing, many with first floor rear additions and all with large to medium established gardens with trees.

Irreversible impacts to the setting

The over-scaled development does not respect the established built form and landscaped character of the streetscape and will result in the loss of the garden setting which will irreversibly impact the heritage significance of the locality.

The proposal is of such a large bulk and scale which is entirely disproportionate, unsympathetic, and out of character to the surrounding HCAs and heritage items in the vicinity which will be especially visually dominated by this proposal.

Urbis Response

The comments regarding the scale and setting of the proposed development are acknowledged and it is accepted that the proposal will result in a departure from the currently existing scale of development on the site. However, it is considered that the proposal will not result in an adverse impact on the setting or heritage significance of the Gordon Park Conservation Area (C17), the Gordon Park Estate, McIntosh and Ansell Conservation Area (C22), or nearby heritage items.

While the development represents an increase in scale compared to surrounding low-density residential development, its perceived bulk has been carefully moderated through increased setbacks between the three buildings and articulation of built form. These measures reduce visual dominance when viewed from McIntosh Street and surrounding heritage areas. The building addressing McIntosh Street has been setback and designed with a differentiated façade to reduce its apparent height and ensure that views along the street are retained.

The setting of McIntosh Street, characterised by detached dwellings within landscaped gardens, is further conserved through the retention of existing mature vegetation and the provision of substantial additional landscaping. This landscape strategy has enhanced the canopy provisions and landscape character. The western setback increase has allowed for additional buffer planting and improved conditions to tree establishment which reinforces the established streetscape.

The front setback has been revised to adopt a more informal setting, with a lawn integrated though planted areas that support layered planting and small groupings, and provide improved integration between public and private domain. The planting palette has been updated to incorporate a diverse mix of tall canopy trees,

layered understory planting, and a combination of evergreen and exotic ornamental species, which all align with the established garden character.

Photomontages prepared for the proposal demonstrate that views from key heritage locations, including *Eryldene* and nearby properties at 49 and 51 Werona Avenue, are substantially screened by existing vegetation, with only limited and filtered views of the development. As a result, the development does not visually dominate these heritage items or their settings.

When considered in its amended form, the proposal respects the established built form and landscaped character of the locality and does not result in an irreversible impact on the setting or heritage significance of the surrounding heritage conservation areas and heritage items.

4.2.8.3 Response to Comment – Setting for No. 19 McIntosh Street (adjacent property in the HCA)

No. 19 McIntosh Street is a contributory building in the HCA as a single storey Victorian style bungalow that has historic and aesthetic significance. It will have direct views to the development on its western side which will overshadow and adversely impact on its setting as there will be a backdrop of a large 8 storey high building.

Urbis Response

The heritage significance of No. 19 McIntosh Street as a contributory building within the Heritage Conservation Area is acknowledged. The potential impacts on its setting, including visual dominance and overshadowing, have been carefully considered in the amended design.

The proposal has incorporated an increased setback to the western boundary between Buildings A and B, which has reduced the scale and visual presence of the development when viewed from No. 19 McIntosh Street. These changes lessen the perception of a continuous built backdrop and mitigate the potential for the development to visually dominate the contributory dwelling.

Overshadowing impacts have also been reduced as a result of these amendments. Shadow analysis demonstrates that winter overshadowing of No. 19 McIntosh Street is limited to a brief period of the day and does not result in a substantial loss of sunlight to the dwelling or its primary private open space.

In addition, retained and proposed landscaping along the western boundary provides further visual softening through buffer planting and assists in maintaining the garden setting of No. 19 McIntosh Street. When considered together, these measures ensure that the setting of the contributory dwelling is respected and that the proposal does not result in an unacceptable adverse impact on its heritage significance.

4.2.8.4 Response to Comment – Setting for the Heritage Items in the Vicinity

No. 17 McIntosh Street, Gordon – Eryldene (State Heritage Item)

Inadequate Landscape Buffer

No. 17 McIntosh Street, Gordon (Eryldene Historic House and Garden) will be adversely impacted by the proposal as it fails to provide an adequate landscape buffer to protect the setting and significance of the heritage item.

Urbis Response

The concern regarding landscape buffering is acknowledged. The amended design provides increased setbacks and substantial landscaped areas along the eastern interface with Eryldene, reinforcing the garden setting and maintaining an appropriate visual and spatial buffer between the proposed development and the heritage item. Existing mature vegetation within the Eryldene gardens is retained and continues to provide effective screening. Additional landscaping within the subject site further strengthens this buffer and protects the setting of the heritage item.

4.2.8.5 Response to Comment – Loss of trees to the street frontage of Eryldene

Some mature trees and open spaces that are currently home to native birds and animals will be destroyed.

Urbis Response

No street trees or trees within the frontage or grounds of *Eryldene* are proposed to be removed. Trees proposed for removal are limited to the rear of the subject site and do not form part of the *Eryldene* landscape or its immediate setting. Existing vegetation and the retained 7 existing large trees that contributes to habitat value, and the visual character of the area is retained where feasible, and replacement planting is proposed to enhance landscape outcomes.

The updated landscape proposal includes the planting of 12 large canopy trees within deep soil zones which are a mix of evergreen and ornamental species, and 30 medium trees within deep soil zones, in addition to the retained trees provides the potential for habitat for birds and animals.

However, please note that it is beyond the scope of this heritage response to address impacts on fauna.

4.2.8.6 Response to Comment – Loss of Significant Plants of Eryldene

The museum is owned by The Eryldene Trust and houses an internationally significant Camellia collection of over 500 plants – many of them rare and endangered. These plants rely on adequate and appropriate light – particularly in the morning, clean rainwater, stable soil pH and good drainage. The proposed development would overshadow parts of the garden and would potentially damage and destroy many of these valuable plants through development contamination, changes to light and hydrology.

Urbis Response

The significance of the Camellia collection and broader garden setting is acknowledged. Overshadowing analysis prepared for the winter solstice demonstrates that overshadowing of the *Eryldene* gardens is limited to approximately one hour in the early morning and affects only a small portion of the eastern boundary of the gardens. This level of overshadowing is understood to not be sufficient to adversely affect the health or viability of the Camellia collection.

Hydrology, groundwater and overland flow assessments have been undertaken and conclude that the proposed development will not adversely affect drainage, soil conditions or water quality within the *Eryldene* gardens. Accordingly, the proposal is not expected to result in contamination, changes to hydrology, or other impacts that would damage or destroy significant plants.

Advice from Studio IZ advised that Camellia plants have shallow root systems. As such the plants rely on surface moisture derived from rainfall and/or supplementary irrigation, and not typically reliant on deep

ground water. The proposed development will not impact the gardens availability to rainwater or impact the assumed internal irrigation system within Eryldene.

4.2.8.7 Response to Comment – Access to Eryldene via Werona Avenue

Eryldene frequently uses the laneway off Werona Avenue that leads to No. 55 Werona Avenue, Gordon for deliveries at the rear of the property for bulk products required to manage this historic garden which is open to the public. This laneway is proposed as an access way to the proposed development and would prevent access to Eryldene via the laneway thus preventing proper care and maintenance of the historic garden.

Urbis Response

The use of the laneway off Werona Avenue for servicing and deliveries to *Eryldene* is acknowledged. The proposal retains the laneway and does not preclude ongoing access for deliveries required for the maintenance and operation of the historic garden. Access arrangements will continue to allow for the functional needs of *Eryldene* to be met.

4.2.8.8 Response to Comment – Loss of Privacy to Adjoining Properties

The scale of the proposed buildings results in direct overlooking into adjoining properties, with particular concern raised regarding views into the heritage listed gardens. This will adversely impact the nature of the space and limit its ongoing use for public access and cultural events.

Urbis Response

Potential privacy impacts have been addressed through increased setbacks, façade articulation and landscape screening to the west side setbacks. These measures minimise direct overlooking into adjoining properties, including views into the *Eryldene* gardens. As demonstrated in the photomontages and design response, the proposal does not compromise the privacy, use or cultural function of the heritage-listed gardens.

4.2.8.9 Response to Comment – Setting for Nos. 49 and 51 Werona Avenue, Gordon and No. 14 Forsyth Street Gordon

Views from these heritage items will drastically change from low rise to high rise with loss of trees as they will be obscured by three large scaled 8 storey buildings.

Urbis Response

The concern regarding changes to setting and views from Nos. 49 and 51 Werona Avenue, Gordon and No. 14 Forsyth Street, Gordon is acknowledged. However, photomontages prepared for the site demonstrate that the proposed development is concealed by existing landscape screening when viewed from these properties.

Existing mature vegetation is retained and continues to provide effective visual screening, ensuring that the proposed buildings do not present as a dominant or visually intrusive element in views from these heritage items. The increased separation between the three buildings further reduces the perception of scale and prevents the development from appearing as a continuous built form.

Accordingly, the proposal does not result in a drastic or unacceptable change to the setting of Nos. 49 and 51 Werona Avenue or No. 14 Forsyth Street and is consistent with the heritage conservation objectives of KLEP 2015 and the principles of the Burra Charter.

4.2.9 Response to Comment – Setbacks

Side setbacks from Nos.19 and 27 McIntosh Street, Gordon and No. 18A Forsyth Street, Gordon

The proposed 8 storey buildings will be located on the adjacent western side boundary to No. 19 McIntosh Street, Gordon and eastern side boundary of No. 27 McIntosh Street, Gordon with minimal separation.

The proposed residential flat building has a four-storey rectilinear sheer high podium wall with four floors above slightly set in which is notably different in scale and contrast to the two-storey buildings in the conservation areas and is not acceptable.

The proposed western side building setback to No. 19 McIntosh Street, Gordon will combine a pedestrian entry and circulation path, which will limit the opportunity to establish tall trees along this interface. This results in poor amenity and reduced privacy to No 19 McIntosh Street, Gordon.

Urbis Response

The concerns regarding side setbacks to Nos. 19 and 27 McIntosh Street, Gordon and No. 18A Forsyth Street, Gordon are acknowledged. The amended design has increased the western setbacks and the separation between Buildings A and B to respond to the setback objectives of the Apartment Design Guide (ADG), which seek to provide adequate building separation, protect residential amenity and ensure an appropriate transition in scale to adjoining properties within heritage conservation areas.

The podium element has been designed to comply with the intent of the ADG by providing greater setbacks at upper levels, reducing the perceived height and bulk when viewed from adjoining properties. Upper-level recesses and façade articulation break down the building mass and avoid a continuous or sheer wall presentation along the side boundaries, consistent with KDCP objectives for modulation and articulation.

Along the western boundary adjoining No. 19 McIntosh Street, the setback accommodates pedestrian access while maintaining sufficient width to enable landscaping in accordance with the KDCP. Select existing trees are retained and additional planting along the western side setback is proposed to support visual screening, protect privacy and maintain residential amenity.

Similarly, the eastern setback adjoining No. 27 McIntosh Street provides for retained vegetation and supplementary landscaping to soften the built form and maintain separation, consistent with the KDCP objectives for side setbacks. Overall, the proposal achieves the intent of the KDCP setback controls by balancing access, landscaping and building separation to minimise impacts on adjoining properties and the heritage conservation area.

4.2.10 Response to Comment – Bulk-massing Scale and Form

Inconsistent bulk

The proposal massing of the residential flat buildings will adversely affect views from the Gordon Park Conservation Area (C17) and the Gordon Park Estate, McIntosh and Ansell Conservation Area (C22) and heritage items in the vicinity, including views to the sky, tree canopies and terracotta roof tops.

The proposed 3x8 storey development does not relate to the predominant scale (height, bulk, density) of the setting around it and will have an adverse impact on the surrounding HCAs and heritage items in the vicinity.

Urbis Response

The amended plans incorporate increased separation between the three buildings and a stepped building form, which breaks down the overall massing and avoids the appearance of a single continuous built form. This design approach allows for sky views between buildings and maintains visual permeability, reducing the perceived bulk when viewed from surrounding conservation areas and heritage items.

Views to tree canopies and the broader landscape setting are largely retained due to existing mature vegetation and additional landscape planting, which continue to frame views and soften the built form. Photomontages prepared from key viewpoints demonstrate that the development is read within a layered landscape context rather than as a dominant built element.

While the proposal introduces buildings of greater height than the immediate low-rise context, the scale and form have been carefully modulated through setbacks, articulation and landscape integration to provide an appropriate transition to surrounding HCAs. When considered in its amended form, the proposal is not considered to result in an adverse impact on the heritage significance or setting of the surrounding conservation areas and heritage items.

4.2.10.1 Response to Comment – Increased Density

The proposed increased density will irreversibly degrade the heritage significance of the Gordon Park Conservation Area (C17) and the Gordon Park Estate, McIntosh and Ansell Conservation Area (C22) and heritage items in the vicinity because of the inconsistency with the existing low scale historic built form. At a height of 8 storeys, this will be one of the tallest structures in the Gordon area with a disproportionate and overbearing impact on the Conservation Areas in the vicinity including inappropriate transition in built form, destroying sightlines, and obliterating the privacy of numerous residences adjacent and proximate to the site.

Urbis Response

The concerns regarding increased density are acknowledged. Clause 5.10 of KLEP 2015 seeks to conserve the environmental heritage of Ku-ring-gai and to conserve the heritage significance of heritage items and heritage conservation areas, including their associated fabric, settings and views.

The subject site is identified within a TOD area, where increased density is anticipated as part of the strategic planning framework. While the proposed development introduces a greater scale than the surrounding low-rise heritage context, it has been designed to ensure that the heritage significance of the Gordon Park Conservation Area (C17), the Gordon Park Estate, McIntosh and Ansell Conservation Area (C22), and nearby heritage items is conserved.

The amended design incorporates increased setbacks, stepped building forms and greater separation between buildings to reduce perceived bulk and visual dominance. These measures assist in conserving important views, maintaining visual connections to sky and tree canopies, and providing an appropriate transition in built form to adjacent heritage areas, consistent with the objectives of Clause 5.10.

The proposal does not involve the removal of heritage items or contributory buildings within the conservation areas, and the Federation and Inter-war dwellings that underpin the heritage significance of the locality are retained. When considered in its amended form, the proposal is not considered to result in an irreversible impact on the heritage significance, setting or views of the surrounding conservation areas or heritage items and is consistent with the heritage conservation objectives of Clause 5.10 of KLEP 2015.

4.2.11 Response to Comment – Landscape Loss

Absence of tall trees

The proposed McIntosh Street frontage will have an absence of tall tree plantings and large deep soil zones that adequately contribute to the leafy and green landscape character of the streetscape and neighbourhood.

The proposed entry path along the western side building setback to No. 19 McIntosh Street will reduce available deep soil and diminishing opportunities for buffer planting and tall tree establishment.

Urbis Response

The comments regarding the provision of tall trees and deep soil zones along the McIntosh Street frontage and the western side setback are acknowledged. The amended landscape proposal has been developed to reinforce the established leafy streetscape character of McIntosh Street. The addition of 12 large canopy trees and 30 medium trees within deep soil zones, provides the opportunities for increased buffer planting and contributes to the leafy streetscape.

The increased western setback along the shared boundary with No. 19 McIntosh Street has additional planting to improve the conditions for tree establishment and additional landscape buffering which increases privacy for No. 19 McIntosh Street.

The amended proposal delivers a considered landscape response that reinforces the established garden character of the neighbourhood and appropriately manages potential impacts on the landscape setting and amenity of the adjoining heritage listed property.

4.2.11.1 Response to Comment – Loss of garden to Eryldene

The proximity of the proposed building to a State Heritage item, which includes a significant winter flowering garden with one of Australia’s most important collections of camellias, is of enormous concern. The Eryldene garden houses one of Australia’s most important collections of camellias and is highly regarded by both the national and international camellia fraternity. The camellia collection comprises some whose origins date back to early colonial times – now very rare and irreplaceable. There are also many camellias which are now commercially unavailable. Also of value are the camellias raised and developed by Professor Waterhouse who was regarded internationally as a camellia expert.

There is adequate shade in the garden due to the very large trees surrounding Eryldene. The proposed development will increase the extent of this shade in the morning to some of the camellias, azaleas and acers on the east side which will be detrimental to their survival.

Urbis Response

The cultural, horticultural and scientific significance of the *Eryldene* gardens, including the internationally significant camellia collection, is acknowledged. The proposal has been carefully assessed to ensure that the setting and ongoing viability of this State Heritage item are conserved.

Overshadowing analysis prepared for the winter solstice demonstrates that any additional shadow cast by the proposed development onto the *Eryldene* gardens is limited in extent and duration. Shadowing is confined to approximately one hour in the early morning and affects only a small portion of the eastern edge of the gardens. The majority of the camellia collection and associated garden areas remain unaffected.

The existing garden at *Eryldene* already functions within a shaded environment created by mature trees, which form an integral part of its historic character and growing conditions. The limited additional morning shade resulting from the proposal is understood to not be sufficient to adversely affect the health or survival of camellias, azaleas or acers within the garden. Further Camellias have shallow root system, as such they are reliant on soil moisture through rainwater and/or irrigation. The proposed development will not impact the water supply to the plants.

Hydrology, groundwater and overland flow assessments have also been undertaken and confirm that the proposed development will not adversely affect drainage patterns, soil conditions or water quality within the *Eryldene* gardens. Accordingly, the proposal is not expected to result in changes to growing conditions that would threaten the viability of the camellia collection.

When considered in conjunction with increased setbacks, retained vegetation and additional landscape buffering, the proposal is not considered to result in the loss of garden area or an adverse impact on the heritage significance or ongoing horticultural value of the *Eryldene* gardens.

4.2.12 Response to Comment – Form, details, materials and colours

4.2.12.1 Inconsistent colours

Concern is raised that the proposed materials and finishes consisting of minimal brickwork and large areas of painted render in light colours will be visually dominating and obtrusive in the streetscape, when viewed from the surrounding heritage conservation areas and heritage items in the vicinity.

It is recommended that the external materials and finishes be amended to comprise primarily bricks of warm, earthy tones and secondary material such as sandstone or timber to present a more recessive building that responds more appropriately to the aesthetic of the surrounding heritage items and conservation areas. Render and grey colours should be avoided.

Urbis Response

The concerns regarding form, materials, colours and visual dominance are acknowledged. In response, the amended design significantly increases the use of brickwork and reduces the extent of light-coloured rendered surfaces. The primary façade material now comprises feature brickwork in warm, earthy tones, including running bond and soldier course detailing, which provides texture and depth and responds to the material character of surrounding heritage conservation areas.

Darker brick tones, bronze-finished elements, bronze aluminium window frames and dark timber soffits are incorporated from ground level to Level 3, establishing a recessive palette that sits comfortably within the landscaped setting. The amended design also introduces brick balustrades at Level 4 and timber-lined

ceilings, further reducing the visual prominence of upper levels and avoiding large expanses of light or grey finishes.

Render is used only as a secondary material and is limited in extent, with colours selected to complement the dominant brickwork and landscape context. Grey finishes have been avoided. Overall, the revised material palette presents a more subdued and recessive building form that responds appropriately to the aesthetic qualities of nearby heritage items and heritage conservation areas, consistent with heritage and KDCP design objectives.



Figure 5 Extract of the updated proposed materials and finishes schedule.

Source: PMDL, 2026, sheet no. DA20.07, Rev C.

4.2.12.2 Solid front fence

The proposed front fence elevation suggests a solid fence with a height range from approximately 1.2m to 3.0m along the frontage. It is recommended the front fence be 1.2 m high and is to be partially transparent such as a low hob brick or sandstone base with palisades above.

Urbis Response

The amendments include a redesign of the front fence, transitioning from a solid wall or fence to a lower-scale, free-standing fence with an approximate height of 1.2 metres. The fence height increases

modestly where required to respond to the sloping topography. The front fence is proposed to be finished light colour sandstone to be consistent with the KDCP design objectives and is largely obscured by proposed plantings. The integration between the private and public domain has therefore been enhanced and the established garden character is better respected.

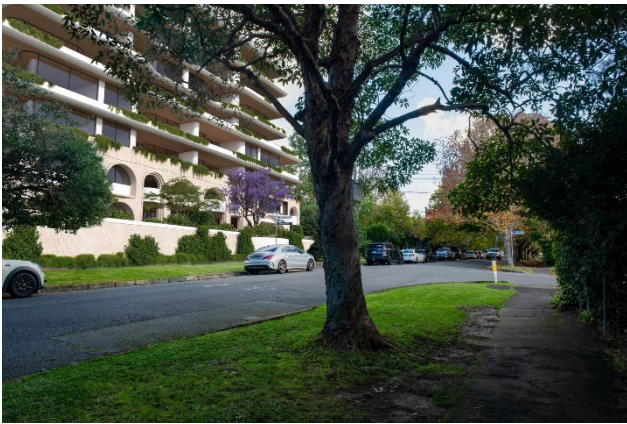


Figure 6 McIntosh Street looking west – Proposal as lodged (May 2025)

Source: Gyde, 2026.

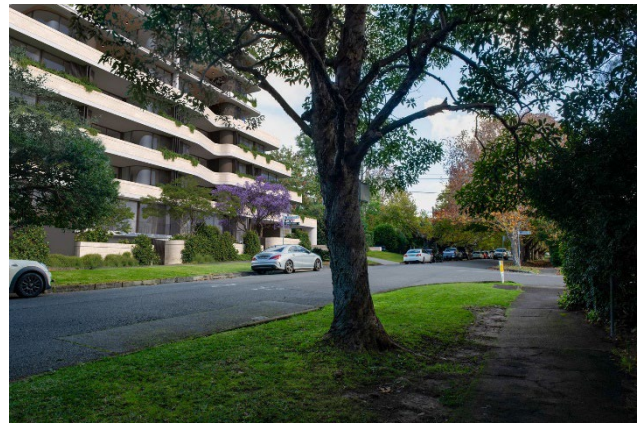


Figure 7 McIntosh Street looking west – Proposal as lodged (March 2026)

Source: Gyde, 2026.

5 Conclusion

This Heritage Impact Statement has assessed the potential impacts of the amendments of the proposed development on nearby heritage items and Heritage Conservation Areas, including the Gordon Park Conservation Area (C17), the Gordon Park Estate, McIntosh and Ansell Conservation Area (C22), and the State-listed heritage item Eryldene at 17 McIntosh Street.

The proposal does not involve the removal of any heritage items or contributory buildings within the identified conservation areas. The only building located within an HCA, 25 McIntosh Street, is identified by Council as a neutral building and does not contribute to the heritage significance of the conservation area. As such, no significant heritage fabric is proposed to be removed.

The site is located within a TOD area, where increased density is anticipated as part of the strategic planning framework. While the proposal introduces a larger-scale development than the surrounding low-rise context, extensive design amendments have been incorporated to conserve the heritage significance, setting and views of nearby heritage items and conservation areas. These amendments include increased setbacks, greater separation between buildings, stepped building forms, and a refined material palette, all of which reduce perceived bulk and visual dominance.

Visual impact assessments, including verified photomontages, demonstrate that views from key heritage locations are largely screened by existing and proposed vegetation. Important sightlines, sky views and the established leafy garden character of McIntosh Street and surrounding areas are retained. Overshadowing analysis confirms that impacts to the Eryldene gardens are limited, occurring for a brief period in the early

morning and affecting only a small portion of the eastern boundary, with no adverse effect on the health or viability of the significant camellia collection.

Hydrology, groundwater and overland flow assessments confirm that the proposed development will not adversely affect soil conditions, drainage or water quality within the Eryldene gardens or surrounding heritage areas. Existing access arrangements to Eryldene are maintained, and privacy impacts have been mitigated through setbacks, articulation and landscape buffering.

The amended landscape strategy reinforces the established garden setting and leafy character of the locality, with enhanced planting along McIntosh Street and additional buffering adjacent to heritage interfaces. The refined material palette, dominated by warm, earthy brick tones, timber elements and subdued finishes, ensures the development is recessive in the landscape and responsive to the aesthetic character of surrounding heritage items and conservation areas.

When considered in its amended form, the proposal is an acceptable response to Clause 5.10 of KLEP 2015, KDCP and the principles of the Burra Charter.

Kind regards,

A handwritten signature in dark ink, appearing to read "Allie Cornish". The signature is fluid and cursive, with a large initial 'A'.

Allie Cornish
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