

STATEMENT OF HERITAGE IMPACT

Culloden Road, Macquarie University, North Ryde

September 2020 - Issue C



Cover Image: Perspective veiw, Looking to the proposed development from Gymnasium Road. *Source: WMK Architecture.*

| CULLODEN ROAD, MACQUARIE UNIVERSITY, NORTH RYDE | | | | |
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INTRODUCTION

1.1 REPORT OVERVIEW

This report has been prepared on behalf of the Royal Institute for Deaf & Blind Children (RIDBC) for submission to the NSW Department of Planning, Industry, and Environment. This report has been prepared in relation to the construction and operation of the new purpose-built 1-3 storey (including basement level) Centre of Excellence across two interconnected pavilions at the corner of Culloden and Gymnasium Road within the MQU Campus.

This report has been prepared as part of the Environmental Impact Statement (EIS) for State Significant Development (SSD) application number SSD-10451.

In accordance with Schedule 1 (clause 15(1)) of State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP), the development qualifies as State Significant Development (SSD) as it is a development for the purpose of a new school (regardless of the capital investment value).

The Secretary's Environmental Assessment Requirements (SEARs) for the development were issued on 6 May 2020 setting out the documentary and reporting requirements for the preparation of the EIS / DA. This Statement of Heritage Impact addresses the issues relating to European built heritage as per the following:

9. Heritage:

Provide a Statement of Significance and an assessment of the impact on the heritage significance of the heritage items on the site in accordance with the guidelines in the NSW Heritage Manual (Heritage Office and DUAP, 1996).

4. Built Form and Urban Design

Provide a visual impact assessment that identifies any potential impacts on the surrounding built environment and landscape including views to and from the site and any adjoining heritage items.

This report evaluates the proposed development designed by WMK Architecture.



Figure 1.1 Location map showing the approximate location of the subject site shaded in yellow. The heritage listed stone cottage ruins is marked with a pink arrow and circle. Source: NSW LRS SIX Maps website

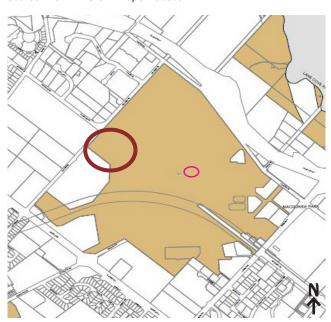


Figure 1.2 Extract from the Ryde LEP Heritage Map 4 showing the general area of the subject site marked with a red circle and the general area of the heritage listed stone cottage ruins marked with a pink circle Source: Ryde LEP 2014

The only actual heritage item on the Macquarie University campus is the ruins of a Stone Cottage, located some distance to the south east from the subject development. However, as the majority of the Macquarie University is located on one title, the whole of that lot is defined as a heritage item as per Figure 1.2.

This report concludes that the proposal will have an acceptable heritage impact.

1.2 DESCRIPTION OF THE CLIENT

The RIDBC is Australia's largest non-government notfor-profit provider of therapy, education and cochlear implant services for children and adults with vision or hearing loss. Established in 1861 as a school with residential facilities, the RIDBC moved to North Rocks in 1961, where the main campus is still located. The RIDBC Mission is to provide quality and innovative services, to achieve the best outcomes for current and future generations of Australians with vision and/or hearing loss.

RIDBC provides a broad range of specialist services which include:

- Early Intervention;
- · Allied Health & Therapy;
- · Cochlear Implant Program;
- Schools (pre-school, primary to secondary programs);
- Research & Professional Education;
- · School support; and
- Paediatric Audiology

The services provided are delivered by a broad group of professionals including: teachers, speech pathologists, occupational therapists, audiologists, orthoptists, psychologists, social workers, technology consultants, physiotherapists, Ear, Nose and Throat (ENT) surgeons and more.

The Centre of Excellence will serve a diverse range of employees, students, users and visitors who will visit the centre for diagnostic services, therapy and rehabilitation, research, education, and co-related services. The centre will provide an intricate design response to the needs of the users, in particular children and adults with vision and hearing loss and other cognitive impairments.

1.3 REPORT OBJECTIVES

The main objective of this Statement of Heritage Impact is to analyse the overall heritage impact of the proposed development in relation to the Environmental Planning Instruments (EPIs) specified in the Secretary's Environmental Assessment Requirements (SEARs) and the guidelines endorsed by the NSW Heritage Council.

1.4 METHODOLOGY AND STRUCTURE

This Statement of Heritage Impact has been prepared in accordance with guidelines outlined in the *Australia ICOMOS Charter for Places of Cultural Significance*, 2013, known as *The Burra Charter*, and the Heritage NSW (in the NSW Department of Premier and Cabinet) publication, *NSW Heritage Manual*.

The Burra Charter provides definitions for terms used in heritage conservation and proposes conservation processes and principles for the conservation of an item. The terminology used, particularly the words place, cultural significance, fabric, and conservation, is as defined in Article 1 of The Burra Charter. The NSW Heritage Manual explains and promotes the standardisation of heritage investigation, assessment and management practices in NSW.

1.5 SITE IDENTIFICATION

As part of the RIDBC's 2016-2020 Strategic Intent it will relocate its school and clinical services activities from North Rocks to a purpose-built centre at Macquarie University (MQU). The new Centre of Excellence will further strengthen the relationship between MQU and the RIDBC, benefit the Australian Hearing Hub, and reinforce the cluster of research, audiology, and healthcare which already exists on the campus, which also includes the Cochlear Global headquarters.

The subject site is located within the Macquarie University Campus, bound by Gymnasium Road and Culloden Road. The subject site is in mixed use zone area and is described by NSW Land Registry Services (LRS) as Lot 191, DP 1157041 and part Lot 8, DP 1047085.

1.6 HERITAGE MANAGEMENT **FRAMEWORK**

Ryde Local Environmental Plan 2014

Macquarie University ruins is listed as a heritage item in Schedule 5 of the Ryde Local Environmental Plan (LEP) 2014, as an item of local heritage significance. Although, the majority of the campus is mapped as a heritage item, this listing relates only to the stone cottage ruins of a stone building that is located near the building W11A and is over 200 metres from the subject site, and is visually separated by several small intervening buildings.

Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)

As the subject site is not included on the World Heritage List, National Heritage List or Commonwealth Heritage List there are no heritage approvals required under the EPBC Act.

Australian Heritage Council Act 2003

As the subject site is not included on the World Heritage List, National Heritage List or Commonwealth Heritage List, and the development is not being undertaken by a Commonwealth agency there are no provisions of this Act applicable to the proposed development.

NSW Environmental Planning and Assessment Act 1979 (EP&A Act)

The Secretary's Environmental Assessment Requirements (SEARs) for SSD 10451 note the EIS is to be consistent with the requirements of the Environmental Planning and Assessment Regulation 2000 (Regulations).

Clause 228(2)(e) of the Regulations requires consideration of "any effect on a locality, place building having aesthetic. anthropological. architectural, cultural, historical, archaeological. scientific or social significance or other special value for present or future generations".

As such, assessment of this application must take into consideration the potential impact of the proposed development on the heritage listed stone cottage ruins within the Macquarie University campus.

NSW Heritage Act 1977

As the subject site is not included on the State Heritage Register there are no heritage approvals required under the NSW Heritage Act 1977 other than those that may be applicable to archaeology.

1.7 **AUTHORSHIP**

This report has been prepared by Dr Shabnam Yazdani Mehr, Heritage Consultant, of GBA Heritage and has been reviewed by the Director, Graham Brooks. Unless otherwise noted, all of the photographs and drawings in this report are by GBA Heritage.

1.8 REPORT LIMITATIONS

While this report is limited to the analysis of European cultural heritage values, GBA Heritage recognises that for over forty thousand years or more Aboriginal people occupied the land that was later to be claimed as a European settlement.

Recommendations have been made on the basis of documentary evidence viewed and inspection of the existing fabric.

Aboriginal and archaeological assessments of the subject site are outside the scope of this report.

This report only addresses the relevant heritage planning provisions and does not general planning or environmental management considerations.

1.9 **COPYRIGHT**

Copyright of this report remains with the author, GBA Heritage.

HISTORICAL SUMMARY

2.1 **BRIEF HISTORY**

The following information is sourced from the NSW Inventory Sheet for the "Macquarie University Ruins", database number 2340186:

The site of Macquarie University and the ruins was originally part of the northern Field of Mars Common established in 1804. From 1874, following an 1861 parliamentary inquiry into the use of the Field of Mars Commons, much of the land was reassumed for settlement; with proceeds of land sales used for the construction of the Gladesville and Figtree bridges. The redevelopment of the "Field of Mars" common commenced in 1885, when the area was subdivided into one to four-acre lots for small orchards, market gardens and farms. The roads in the subdivision were named after famous military battles, including Waterloo (after the 1815 Battle of Waterloo) and Culloden (after the 1746 Battle of Culloden). 270 acres purchased by the wealthy inventor and manufacturer Harry Curzon-Smith (1861-1913), who built Curzon Hall nearby on Agincourt Road, in 1897-1899. This land included the site. The Harry Smith, who was born in Canada, came to Sydney with his father (also an inventor and manufacturer) in 1877.

The Macquarie University ruins stands on allotment 673 of the Field of Mars subdivision, which was purchased by Sarah Jane Wilcock (1848-1929) of St Peters and her 6-year-old daughter Annie Cecilia Wilcock (1888-1971), on the 17th of August 1894. The use of the land by the Wilcocks is unknown, however it is assumed that they leased the land.

Sarah Jane Wilcock sold Lot 673 to Lucia Fampatti Giumelli on 7th October 1909. Luca and her husband Agostino owned the adjacent allotment 683 on the corner of Waterloo and Culloden roads, where they had already built a timber home and timber slab sheds. The 1943 aerial photos of Sydney (NSW Land & Property Information) show a cluster of six buildings on Lot 683 facing Waterloo Road. Agostino is described on the title deeds as an orchardist. The couple, who had four children while living at the Field

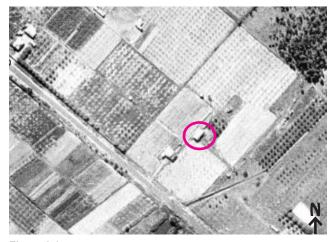


Figure 2.1 1943 aerial showing the heritage listed stone cottage ruin within the agricultural landscape

Source: NSW LPI SIX Maps Website

of Mars, were one of three Italian families to purchase land in the Field of Mars subdivision. An oral history interview in 1999 with Lucy, the Giumelli's youngest daughter, described how the land was originally forest which was cleared by her father, however Lucy only mentions timber buildings built by her father, and a well. Lucy described the property as an orchard with grape vines (for wine), citrus, apple and peach trees. Livestock included one horse, one cow, one pig and some chickens. The Guimellis were shareholders in the Eastwood Co-operative and would take their produce by horse and cart to market at a shed on the corner North and Blaxland Roads and some across the Parramatta River. Agostino Guimelli came to Australia in the 1880s at 16 to the Western Australian goldfields, and later worked as a charcoal burner in Queensland before coming to Marsfield. The Guimelli family continued to farm Lot 683 until the land was resumed in 1965 under the Macquarie University Act.

However, Lot 673, the site, was sold by the Guimellis on 21st February 1930 to Bortolo Ricetti. Bortolo arrived in Australia from Lombardy in Northern Italy in 1909. He worked on the North Coast railways, starting at Wallsend, for two and a half years, then as a farmer as Upper Lansdowne on the mid north coast. Bortolo applied for naturalisation, which was granted on 12th August 1914, when he was listed as living at Upper Lansdowne.

With the outbreak of World War I, Bortolo Ricetti enlisted on 2nd January 1917, his enlistment papers describing him as 30 years old, 5 feet 2 inches in height, dark complexion with brown eyes and hair, and listing his next of kin as his brother Peitro Ricetti, who also lived at Upper Lansdowne. Bortolo developed a vineyard on Lot 673 and eventually produced his own wine and spirits. On Friday 31st August 1934, the Sydney Morning Herald published an article on Bortolo Ricetti regarding operation of an illicit still on the property. Bortolo was fined 100 pounds for having illicit spirits in his possession. Bortolo had stonemasonry skills from his Lombardy background, and was also an experienced farmer able to build his own distillery setup. Consequently, the evidence points to Bortolo Ricetti having built the stone building now in ruins on Lot 673. The 1943 aerial photo (NSW Land & Property Information) clearly shows a small building on Lot 673 at the location of the stone ruin, providing evidence for the construction of the building by Bortolo Ricetti between 1930 and 1942.

On 15th June 1945 Attilio Pietrobon purchased the land from Bortolo Ricetti. Attilio had migrated to Australia in 1924, working initially as a cane cutter in north Queensland. Attilio was part of a between-the-wars wave of Italian migrants to Australia escaping poverty in the rural areas of Italy. Attilio applied for naturalisation in 1930, when he was recorded as residing at Halifax in north Queensland. By 1945 Attilio had moved in Sydney, first becoming an orchardist at Eastwood and then moving to Marsfield. The sale of the allotment to Attilio, at the time designated "alien" during World War II, required the approval of the Attorney General's office. Attilio continued to farm the land until its resumption in 1965 under the Macquarie University Resumption Act.

During the 1960s, of the 109 properties on the current university site, 59 had belonged to people born in Italy. The Macquarie University Resumption Act allowed for 939 acres to be rezoned to educational, residential and industrial uses (industries related to university activities). The organisational structure of Macquarie University was modelled on Stanford University in San Francisco with the university library using the U.S.A. Library of Congress cataloguing system, to create a world-class educational institution.

In 1999, the University with the surrounding industrial areas and shopping centre were officially renamed from the suburbs Marsfield and North Ryde to Macquarie Park.

SITE DESCRIPTION

3.1 **DESCRIPTION OF THE** HERITAGE LISTED MACQUARIE **UNIVERSITY RUINS**

The following has been taken from the NSW Inventory Sheet for the "Macquarie University Ruins", database number 2340186:

The ruins are situated off the southern end of Gymnasium drive (preciously Waterloo Road) adjacent to the Lighthouse Theatre car park, to the north-east of the Lighthouse Theatre, on sloping ground near a former creek line. The ruins are surrounded on three sides by lawns, with the west wall parallel to the Lighthouse Theatre carpark. A small concrete gutter separates the ruins from the car park. On the southern side is a substantial mature weeping willow tree with some branches and foliage overhanging the ruins.

The ruins are of a stone walled shed, consisting of four walls (no roof, an example of Northern Italian stonemasonry techniques. The walls are constructed of random rubble stonework held together with lime mortar, built from locally sourced stone from the property. Window openings contain hardwood timber head and sill beams. There is a large opening in the wall on the western side adjacent to the car park, and a smaller opening on the eastern side, both of which may have been doorways. There are single window openings in each of the walls, and a small opening, possible a window opening.

There is a modern concrete paving inside the ruins, and concrete drainage associated with an adjacent car park on one side of the building. The walls have had recent sandstone capping. Temporary metal security fencing is located around the building, and the side is marked by a "restricted area" sign.

The ruins are exposed to the weather, however it is clearly evident form their craftsmenship that the structure was built using a high quality technique, as it is presumed that the ruins have remained uninhabited since resumption in 1960s. There is a large vertical crack on the southern wall.

3.2 VIEWS TO AND FROM THE SITE

The proposed development is located on the corner of Culloden and Gymnasium Roads. The south east view to the Sport and Aquatic Centre is identified as a key view to and from the subject site. However, an abundance of flora and vegetation in every direction of the subject site obscure its views.

The subject site is sufficiently separated from the heritage stone cottage ruins. Therefore, there is no visual, physical, or architectural relationship between the subject site and the heritage item. Furthermore, no heritage significant views have been outlined in the statement of significance for the heritage item.



Aerial map showing the relationship between the subject site (shaded in yellow) and the heritage listed item (circled in pink). The map shows the Macquarie University Central Courtyard Development is under construction (circled in red) Source: Near Maps



Figure 3.2 View of the stone cottage ruins, looking south. The Macquarie University Central Courtyard is seen in the background.



Figure 3.3 View of the stone cottage ruins.



Looking to the subject site from the stone cottage ruins.



Looking to the stone cottage ruins from the subject site. The Sport and Aquatic Centre is seen on the right.



Figure 3.6 Looking to the subject site from the corner of Culloden Road and Gymnasium Road.



Figure 3.7 Looking west to the subject site from Gymnasium Road.

DESCRIPTION OF THE PROPOSAL

The proposed development, designed by WMK Architecture, is detailed in the plans and Environmental Impact Statement (EIS) that accompany this application. The development includes:

- Pre-School and School accommodation for up to 80 pre-school children and up to 120 school children in a single storey pavilion addressing Culloden Road; and
- The main RIDBC building (accommodating approximately 260 staff) of up to three storeys, including basement level:
 - Public areas for staff and visitors;

- RIDBC Renwick Centre classrooms (doubling also as conferencing facilities) and a business hub:
- Medical Facility for various clinical services; and
- RIDBC Renwick Centre resource centre; use between RIDBC Renwick Centre staff, clinicians and pre-school / primary school teaching staff.

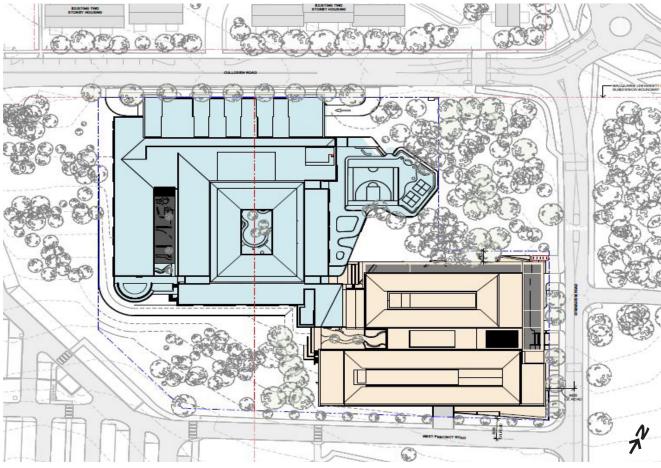


Figure 4.1
The proposed development, site plan.
Source: WMK Architecture.

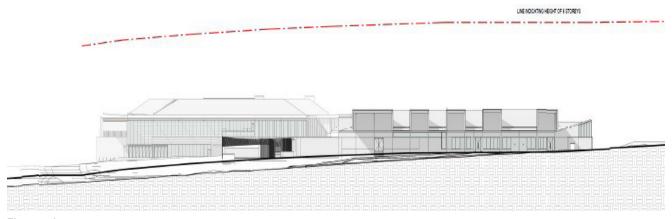


Figure 4.2Looking to the proposed development from Culloden Road. *Source: WMK Architecture.*

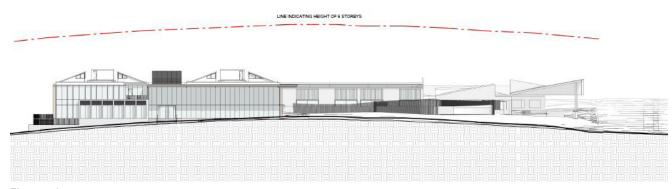


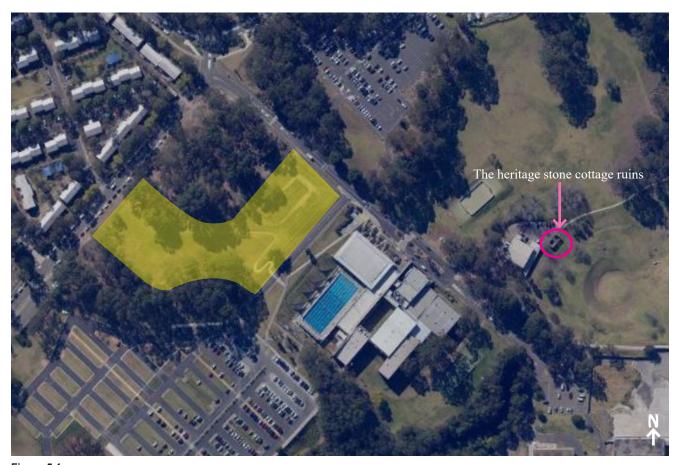
Figure 4.3Looking to the proposed development from Gymnasium Road. *Source: WMK Architecture.*

ASSESSMENT OF HERITAGE IMPACT

5.1 INTRODUCTION

This Statement of Heritage Impact has been prepared in relation to the following impact assessment criteria, the Ryde Local Environmental Plan (LEP) 2014, the Ryde Development Control Plan (DCP) 2014 and Heritage NSW (in the NSW Department of Premier and Cabinet) guidelines, Altering Heritage Assets and Statements of Heritage Impact.

This section of the report provides a detailed analysis of the statutory controls applying to this site, with regard to heritage.



Aerial photograph showing the approximate location of the subject site, shaded in yellow, and the listed heritage item circled in pink Source: maps.au.nearmap.com

5.2 **ESTABLISHED SIGNIFICANCE** OF THE HERITAGE ITEMS IN THE **VICINITY OF THE SUBJECT SITE**

The Macquarie University ruins is a locally listed heritage item in accordance with Schedule 5 of the Ryde LEP, 'Macquarie University Ruins'. Although, based on the Ryde LEP 2014 protocol the majority of the campus is mapped as a heritage item, the listing only relates to the stone ruin building that is positioned near the building W11A, which is over 200 metres from the subject site. These stone cottage ruins are a reminder of the agricultural past of the existing University grounds.

The NSW State Inventory listing includes the following Statement of Significance for the Macquarie University Ruins:

The ruins of the stone building built between 1930 and 1943 are of historical significance as a representative of the highpoint of market gardens, orchards and poultry farms located on the Macquarie University site from the 'Field of Mars' subdivision of 1885 to the resumption of the land in 1965 under the Macquarie University Resumption Act. The 'Field of Mars' subdivision was created as a rural subdivision to encourage small allotment farming in the late 1880s, with importance placed on the cultivation of produce for the Sydney Market. The ruin is the only remaining building on the Macquarie University site representing its immigrants and agricultural past. The Macquarie University Ruin has historical association with Italian immigrants and agricultural life in the Sydney Basin in the early to mid 20th century. By the 1960s on the Macquarie University site of the 109 properties 59 were owned by Italians. Many Italian immigrants were skilled in farming, stonework and carpentry before they arrived in Australia. The stone ruin illustrates the influence of local property owners of Italian heritage on architecture and agricultural practices. The Macquarie University ruin is of aesthetic significance as the ruins of an agricultural building built from locally sourced stone from the property, with random rubble stonework held together with lime mortar, being an example of northern Italian stonemasonry techniques. The ruin is of social significance for the descendants of Italian stonemasonry techniques. The ruin is of social significance for the descendents of Italian immigrants to the Ryde area in the early to mid 20th century. The site has potential research significance for the possible remains of an underground distillery.

Other listed heritage items in the wider locality are separated from the subject site by intervening development, distance, and public domain, and have no direct visual connection to the site. Therefore, they are not considered in this report.

CONSIDERATION OF THE 5.3 **GUIDELINES OF THE NSW** HERITAGE DIVISION

Heritage NSW (in the NSW Department of Premier and Cabinet) has published a series of criteria for the assessment of heritage impact. The relevant 'questions to be answered' in the NSW Heritage Manual 'Statements of Heritage Impact' guidelines relating to development adjacent to a heritage item have been considered in the preparation of the following commentary; they are:

New Development Adjacent to a Heritage Item

- How is the impact of the new development on the heritage significance of the item or area to be minimised?
- Why is the new development required to be adjacent to a heritage item?
- How does the curtilage allowed around the heritage item contribute to the retention of its heritage significance?
- How does the new development affect views to, and from, the heritage item? What has been done to minimise negative effects?
- Is the new development sympathetic to the heritage item? In what way (e.g. form, siting, proportions, design)?
- Will the public, and users of the item, still be able to view and appreciate its significance?

Comment

The proposed development is not located immediately adjacent to the listed heritage item. It is set well back from the heritage listed stone cottage ruins. As such, there is no relationship between the subject site and the heritage item, having no physical or architectural impact on the heritage item.

There are no heritage significant views outlined in the statement of significance for the heritage item. Furthermore, an appropriate separation distance between the proposed development and the heritage item, makes a minimal visual impact on the heritage item.

The heritage listed stone cottage ruins is located at the lowest topographical point, surrounded by trees and a recent development on the south side. The heritage item is not well visible from the subject site and the public. Therefore, the proposed development will not have an adverse impact on the views to the heritage item, while the public and users of Macquarie University will still be able to view and appreciate its significance as the agricultural history of the site.

The proposed development is in keeping with the general scale and character of the Macquarie University Campus and the surrounding neighbourhood, thus is considered appropriate from a heritage perspective.

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

- The proposed development is well separated from the heritage item, having no architectural, physical, or historical relationship with the heritage item. Therefore, the proposed development retains the established heritage significance of the stone cottage ruins.
- The proposed development retains and respects the curtilage of the heritage item.
- The proposed development is set well back from the heritage listed item, having minimal impact on views to and from the heritage listed stone cottage ruins.

HERITAGE OBJECTIVES OF THE 5.4 **RYDE LEP 2014**

The proposed development is considered to be acceptable, from a heritage perspective, for the following reasons:

- Retains views to and from the adjacent heritage item
- There will be no adverse impact on the established heritage significance of the listed heritage item in the vicinity of the site.

The proposal is, therefore, considered to be consistent with the relevant heritage objectives of the Ryde LEP 2014, which are:

4.3 Height of buildings

- (1) The objectives of this clause are as follows:
- (a) to ensure that street frontages of development are in proportion with and in keeping with the character of nearby development,

- (b) to minimise overshadowing and to ensure that development is generally compatible with or improves the appearance of the area,
- (c) to encourage a consolidation pattern and sustainable integrated land use and transport around key public transport development infrastructure,
- (d) to minimise the impact of development on the amenity of surrounding properties,
- (e) to emphasise road frontages along road corridors.

5.10 Heritage conservation

(1) Objectives

The objectives of this clause are as follows:

- (a) to conserve the environmental heritage of Ryde.
- to conserve the heritage significance of (b) heritage items and heritage conservation areas, including associated fabric, settings and views,

Comment

The proposed development is 1-3 storey (including basement level). As such, it is consistent with the development along the Culloden and Gymnasium Roads. The proposed development is set well back from Culloden and Gymnasium Roads, retaining and enhancing the appearance of the area. Furthermore, the proposed development is well separated from the Macquarie University Ruins, conserving the heritage significance of the heritage item, as well as its associated views. Accordingly, the proposed development is consistent with the heritage objectives of the Ryde LEP 2014 in terms of 'Height of Buildings' and 'Heritage Conservation'.

HERITAGE OBJECTIVES OF THE 5.5 RYDE DCP 2014

As there is no Heritage Objectives in the Ryde DCP 2014 in relation to a new development in the vicinity of a heritage item, this report only evaluates the proposed development against the Heritage Objectives of the Ryde LEP 2014.

CONCLUSIONS AND RECOMMENDATIONS

6.1 CONCLUSIONS

- The site at Culloden Road, Macquarie University is **not** specifically listed as an item of heritage significance in any statutory instrument.
- It is located on the outer edge of the Macquarie University property, all of which is mapped as a heritage item due to the presence of the historic stone cottage ruins, "Macquarie University Ruins".
- Other listed heritage items in the wider locality are separated from the subject site by intervening development, distance, and public domain, and have no direct visual connection to the site.
- The proposed development is consistent with the existing form of development within the Macquarie University Campus.
- The proposed development is well separated from the heritage listed stone cottage ruins, and will have no adverse impact on the heritage significance of the heritage listed stone cottage ruins.
- There are no views between the subject site and the historic stone cottage ruins in the vicinity that have been identified as contributing factors to the cultural heritage significance of the ruins.
- The proposed development at Culloden Road, Macquarie University does not generate any adverse impact, as existing views and the setting of the heritage listed stone cottage ruins is retained.
- The proposed development at Culloden Road, Macquarie University will have no adverse impact on the heritage significance of the historic stone cottage ruins.
- The proposed development is consistent with the heritage requirements and guidelines of the Ryde LEP 2014.
- Should any unexpected relics be disturbed during excavation of the site, they must be managed under the statutory Archaeological provisions of the NSW Heritage Act.

6.2 RECOMMENDATIONS

 Council should have no hesitation, from a heritage perspective, in approving the application.

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