SUBJECT: INTERIM HERITAGE ORDER - 14 SUNDERLAND STREET,

MAYFIELD

REPORT BY: PLANNING AND ENVIRONMENT

CONTACT: EXECUTIVE DIRECTOR PLANNING AND ENVIRONMENT /

INTERIM EXECUTIVE MANAGER PLANNING AND

**DEVELOPMENT** 

#### **PURPOSE**

To request that Council place an Interim Heritage Order (IHO) over 14 Sunderland Street, Mayfield.

#### **RECOMMENDATION**

- 1 That Council:
  - a. Make an Interim Heritage Order as set out in **Attachment B** pursuant to sections 25(2) and 27(a) of the *Heritage Act 1977* and in accordance with the Ministerial Order published in the NSW Government Gazette on 12 July 2013 in respect to the land located at 14 Sunderland Street, Mayfield (Lots 27A and Lot 27B in Section D of DP 977626); and
  - b. Initiate further investigations to determine if a Planning Proposal to list the property as an item of local heritage significance within Schedule 5 Environmental Heritage of the Newcastle Local Environmental Plan 2012 is warranted; and
  - c. Commence the Planning Proposal process, including seeking Gateway Approval, to list the property as an item of local heritage significance should it be determined through further detailed investigation that 14 Sunderland Street, Mayfield is an item of local heritage significance.

#### **BACKGROUND**

- A development application (DA2023/00965) was received on 13 October 2023 for the 'demolition of an existing dwelling and erection of a two-storey co-living housing development, comprising 30 individual rooms' at 14 Sunderland Street Mayfield.
- The DA was placed on public notification on two occasions, most recently between 10 November and 24 November 2023, and over 60 submissions were received in response.
- 4 Currently 14 Sunderland Street, Mayfield is not listed as an item of heritage significance under the *Newcastle Local Environmental Plan 2012* (NLEP 2012) and it is not located in a heritage conservation area. However, a concern expressed throughout the submissions

#### Report to Ordinary Council Meeting on 27/02/2024

relates to the heritage significance of the building as the property is subject to a development application that proposes demolition of the building.

- At the Council Meeting on 28 November 2023, Councillors endorsed a Notice of Motion 9.4 Protecting and Valuing Newcastle's Heritage (the NOM, **Attachment D**). The NOM notes that the City of Newcastle values the unique heritage and character of its buildings, streetscapes, and landscapes, and requested an update from staff on several matters including the development application for 14 Sunderland Street, Mayfield.
- On 4 December 2023, Class 1 proceedings in the Land and Environment Court of NSW commenced. The appeal is in response to the deemed refusal of DA2023/00965.
- On 20 February 2024, a local heritage item nomination for 14 Sunderland Street, Mayfield was received, prepared by members of the community. Further, the nomination requests that Council place an IHO over the property.

## **INTERIM HERITAGE ORDER (IHO)**

- An IHO is a temporary heritage protection measure that safeguards a place of potential heritage significance for a period of up to 12 months. An IHO prevents demolition or harm to a building for a temporary period. It enables the Council to undertake a detailed heritage assessment, determine if a place should be listed as a heritage item under the LEP, and prepare a planning proposal if necessary.
- The legal effect of an IHO is made by a local Council is that approval is required for any development for the duration of the order and demolition is prohibited during that time.
- A key requirement for imposing an IHO over a property by Council is that it must have considered a preliminary heritage assessment of the item, prepared by a person with appropriate heritage knowledge, skills and experience, employed or retained by the council, and considered that the item is (or is likely to be found) to be of local heritage significance.
- 11 Council engaged an independent heritage consultant to prepare a Preliminary Heritage Assessment of the site (Attachment A). The Preliminary Heritage Assessment finds the following:
  - a. The dwelling house at 14 Sunderland Street, Mayfield is likely to reach the local significance threshold under the NSW heritage assessment criteria for historical significance, historical association, social significance, rarity, and representativeness.
  - b. The property should be considered for listing as a local heritage item on Schedule 5 of the NLEP 2012.
  - c. That a detailed Heritage Assessment of the property should be undertaken to confirm the integrity of internal fabric and confirm the overall significance of the property.

#### CITY OF NEWCASTLE

Report to Ordinary Council Meeting on 27/02/2024

- Another key requirement for imposing an IHO over a site by Council is that it must consider that the subject property is being or is likely to be harmed. The lodgment of the Class 1 Appeal constitutes a threat of harm, should the appeal be upheld.
- Should Council resolve to make the IHO, it must be published in the Government Gazette. The IHO would apply to the following site (shown in **Attachment A**):
  - a. 14 Sunderland Street, Mayfield (Lots 27A and 27B, DP 977626)
- During the first 6 months of the IHO period, an in-depth heritage assessment must be carried out to determine if it is warranted to list 14 Sunderland Street, Mayfield as an item of local heritage on the NLEP 2012.
- For the remaining six months of the IHO period, should the property be determined to be of local heritage significance, the Council would prepare a Planning Proposal, obtain Gateway Determination, and place the Planning Proposal on public exhibition.

#### FINANCIAL IMPACT

14 The costs associated with this matter are met under the operational budget.

#### **COMMUNITY STRATEGIC PLAN ALIGNMENT**

In acknowledgment of the potential heritage significance of 14 Sunderland Street, Mayfield, the temporary protection of the site is consistent with the following strategic directions of the Newcastle 2030 Community Strategic Plan.

# Vibrant, Safe and Activated Public Places

3.2a Celebrate Newcastle's cultural heritage and diversity.

#### **Livable and Distinctive Built Environment**

- 5.1a Protect and promote our unique built and cultural heritage.
- 5.1b Ensure our suburbs are preserved, enhanced, and promoted, while also creating opportunities for growth.
- 5.1c Facilitate well designed and appropriate scale development that complements Newcastle's unique character.

#### HERITAGE STRATEGY ALIGNMENT

In acknowledgment of the potential heritage significance of 14 Sunderland Street, Mayfield, the temporary protection of the site is consistent with the following objectives of the Newcastle Heritage Strategy 2020–2030.

#### Protecting our heritage

2.1 CN develops and implements policy and guidance based on the principles of the Burra Charter and best practice to ensure there is a strong future for heritage items, heritage conservation areas, archaeological relics and sites, Aboriginal objects and Aboriginal places.

# Supporting our heritage

3.2 CN to lead by example by ensuring that heritage is given due consideration in CN projects and development assessment, with decision-making informed by community engagement and facilitated by CN staff training.

#### **IMPLEMENTATION PLAN/IMPLICATIONS**

Following implementation of the IHO, Council must undertake a detailed heritage assessment of the site, prepare a planning proposal to list the site as a heritage item on Schedule 5 of the NLEP 2012, and forward the planning proposal to the Department of Planning, Housing, and Infrastructure, for gateway determination.

#### **RISK ASSESSMENT AND MITIGATION**

- There is a right of appeal to the Land and Environment Court against the making of an IHO by a local Council.
- 19 Class 1 proceeding in The Land and Environment Court of NSW have commenced. The appeal is in response to the deemed refusal of DA2023/00965

#### **RELATED PREVIOUS DECISIONS**

At the Council Meeting on 28 November 2023, Councillors endorsed Notice of Motion 9.4 Protecting and Valuing Newcastle's Heritage.

# CONSULTATION

- An independent heritage consultant has been engaged by Council to prepare a preliminary heritage assessment of the subject site (**Attachment C**) for Councils' consideration.
- Should Council resolve to place an IHO over the subject site, further investigations will be undertaken to inform whether a Planning Proposal should be prepared to list the property as an item of local heritage significance under LEP2012.

# **OPTIONS**

# Option 1

The recommendation as at paragraph 1. This is the recommended option.

# Option 2

Council resolves not to place an Interim Heritage Order on 14 Sunderland Street, Mayfield. This option will not achieve the strategic directions of the CSP, will be inconsistent with the Newcastle Heritage Strategy 2020–2030, and will leave the building in danger of material harm. This is not the recommended option.

# **REFERENCES**

#### **ATTACHMENTS**

Attachment A: Map of 14 Sunderland Street, Mayfield

Attachment B: Interim Heritage Order - 14 Sunderland Street, Mayfield

Attachment C: Preliminary Heritage Assessment—Artefact

Attachment D: Notice of Motion 9.4 Protecting and Valuing Newcastle's Heritage

**28 November 2023** 

# ATTACHMENT A

The nominated IHO curtilage is proposed to apply to Lots 27A and 27B, DP 977626 (shown highlighted below).



# **ATTACHMENT B**

Interim Heritage Order - 14 Sunderland Street, Mayfield

#### **HERITAGE ACT 1977**

#### **INTERIM HERITAGE ORDER NO. 2024/01**

Under Section 25 of the *Heritage Act 1977*, City of Newcastle does by this order:

- i. Make an Interim Heritage Order to cover the item of the environmental heritage specified or described in Schedule 'A'; and
- ii. Declare that the Interim Heritage Order shall apply to the curtilage or site of such item, being the land described in Schedule 'B'.

This Interim Heritage Order will lapse six months from the date that is it made unless the local council has passed a resolution before that date either:

- 1) In the case of an item which, in the council's opinion, is of local significance, to place the item on the heritage schedule of a local environmental plan with appropriate provisions for protecting and managing the item; and
- 2) In the case of an item which in the council's opinion, is of State heritage significance, nominate the item for inclusion on the State Heritage Register.

JEREMY BATH Chief Executive Officer City of Newcastle

Newcastle. Dated: 27/02/2024

#### Schedule 'A'

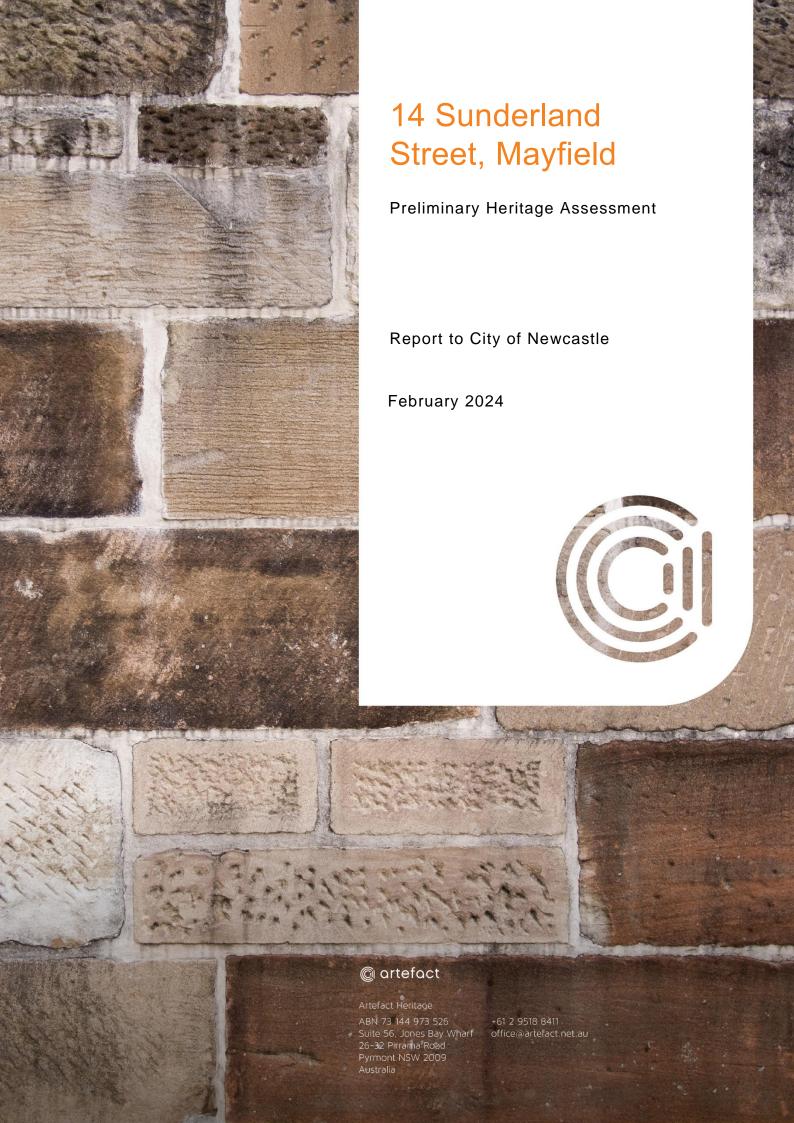
The property situated at 14 Sunderland Street, Mayfield on the land described in Schedule 'B'

# Schedule 'B'

The parcel of land known as Lots 27A and 27B, DP 977626 relating to Newcastle Interim Heritage Order for 14 Sunderland Street, Mayfield.

# ATTACHMENT C

Preliminary Heritage Assessment – *14 Sunderland Street Mayfield* Artefact (February 2024)



# **Document history and status**

Version	Date issued	Reviewed by	Approved by	Date approved	Version type
1	27/02/2024	JW		27/02/2024	Draft
2					
3					
4					

Project name: 14 Sunderland Street, Mayfield – Heritage Assessment

Authors: Kristen Tola, Jennifer Castaldi

Project manager: Jenny Winnett
Project number: 240067

Name of organisation: Artefact Heritage Services

Document version: Draft

#### © Artefact Heritage Services

This document is and shall remain the property of Artefact Heritage Services. This document may only be used for the purposes for which it was commissioned and in accordance with the Terms of the Engagement for the commission. Unauthorised use of this document in any form whatsoever is prohibited.

Disclaimer: Artefact Heritage Services has completed this document in accordance with the relevant federal, state and local legislation and current industry best practice. The company accepts no liability for any damages or loss incurred as a result of reliance placed upon the document content or for any purpose other than that for which it was intended.

# **CONTENTS**

5.4	Preliminary statement of significance	20
6.0	Conclusion and Recommendations	22
6.1	Conclusions	22
6.2	Recommendations	22
7.0	References	23



# LIST OF ABBREVIATIONS

Artefact	Artefact Heritage and Environment
Burra Charter	Burra Charter: The Australian ICOMOS Charter for Places of Cultural Significance (2013) guide to caring for heritage places in Australia, available online from Australia ICOMOS
CMP	Conservation Management Plan
DCP	Development Control Plan (a Council guideline for development which accompanies and elaborates on the Council's Local Environmental Plan)
DP	Deposited Plan
ha	hectare
HCA	Heritage Conservation Area
Heritage NSW	Heritage New South Wales (Office of the Heritage Council of New South Wales, previously also known as the NSW Heritage office, the Heritage Branch, the Heritage Division of the Office of Environment and Heritage—OEH)
ICOMOS	International Council of Monuments and Sites
km	Kilometre
LGA	Local Government Area
LEP	Local Environmental Plan (made by local government Councils)
NSW	New South Wales
S170	Section 170 of the NSW Heritage Act 1977 which requires government agencies to keep a Heritage & Conservation Register of the heritage places they own and manage
SHI	State Heritage Inventory (Heritage NSW's response to requirement to keep a publicly accessible list of all statutory-listed heritage places under NSW Heritage Act 1977)
SHR	State Heritage Register
SoHI	Statement of Heritage Impact



# 1.0 INTRODUCTION

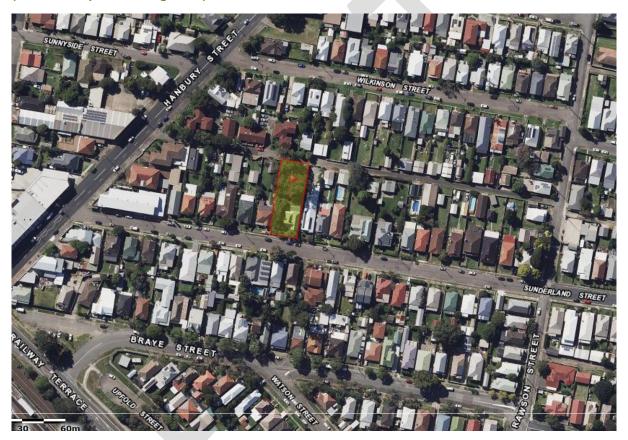
# 1.1 Project background

Artefact Heritage and Environment (Artefact) has been engaged by City of Newcastle (CN) to prepare a Heritage Assessment that provides preliminary heritage advice for the residential building located at 14 Sunderland Street, Mayfield NSW.

# 1.2 Study area

The subject site is located at 14 Sunderland Street, Mayfield NSW (Lots 27A & 27B/D/DP977626), with a lot size of 400 m<sup>2</sup>, and is in the City of Newcastle Local Government Area (LGA).

Figure 1: Location of study area showing 14 Sunderland Street, Mayfield outlined in red (Source: maps.six.nsw.gov.au)



# 1.3 Methodology

This report provides an assessment of the heritage significance of the subject building in Mayfield. It includes a summary history and description of the locality and provides a detailed analysis of the heritage significance of the building. It has been prepared in accordance with the following guidelines:

- The Burra Charter, Australia ICOMOS, 2013.
- Assessing Heritage Significance, Heritage NSW, 2023A.

# 1.4 Limitations

This report assesses historical built heritage only. It does not assess Aboriginal cultural heritage or archaeological remains and their values. It was informed by desktop research, as well as by local history materials obtained through Newcastle Library. A site inspection of the exterior of the building from the street was undertaken by Jennifer Castaldi (Senior Associate, Artefact) on 22 February 2024. The rear yard and building interior was unable to be accessed during preparation of this report.

# 1.5 Authorship

Background research for this report was prepared by Kristen Tola (Heritage Consultant). The heritage assessment has been prepared by Jennifer Castaldi (Senior Associate) with technical review and quality assurance by Scott Macarthur (Principal – Built Environment) and Jenny Winnett (Technical Director), all of Artefact Heritage and Environment.



# 2.0 STATUTORY AND LEGISLATIVE CONTEXT

# 2.1 Heritage Act (NSW) 1977

The NSW Heritage Act 1977 (Heritage Act) is the primary item of State legislation affording protection to items of environmental heritage in NSW. The Heritage Act is designed to protect both listed heritage items, such as standing structures, and potential archaeological remains or relics.

Under the Heritage Act, 'items of environmental heritage' include places, buildings, works, relics, moveable objects and precincts identified as significant based on historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic values. State significant items are listed on the NSW State Heritage Register and are given automatic protection under the Heritage Act against any activities that may damage or affect its heritage significance.

## 2.1.1 State Heritage Register

The State Heritage Register (SHR) was established under Section 22 of the Heritage Act and is a list of places and objects of particular importance to the people of NSW, including archaeological sites.

To carry out activities within the curtilage of an SHR-listed item, approval must be sought under a Section 60 of the Act. In some circumstances where works are minor in nature and assessed to have minimal impact on the heritage significance of the SHR-listed item, they can be undertaken under a Section 57(2) Exemption or in accordance with agency or site-specific exemptions.

There are **no items** listed on the State Heritage Register in or within 200m of the study area.

# 2.1.2 Section 170 registers

Under the Heritage Act all government agencies are required to identify, conserve and manage heritage items in their ownership or control. Section 170 (s170) requires all government agencies to maintain a Heritage and Conservation Register that lists all heritage assets and an assessment of the significance of each asset. They must also ensure that all items inscribed on its list are maintained with due diligence in accordance with State Owned Heritage Management Principles approved by the Government on advice of the NSW Heritage Council. These principles serve to protect and conserve the heritage significance of items and are based on NSW heritage legislation and guidelines.

There are **no items** listed on a s170 Heritage and Conservation Register in or within 200m of the study area. s170 Heritage and Conservation Register.

# 2.2 Environmental Planning and Assessment Act (NSW) 1979

The Environmental Planning and Assessment Act 1979 (NSW) (EP&A Act) establishes the framework for cultural heritage values to be formally assessed in the land use planning and development consent process. The EP&A Act requires that environmental impacts are considered prior to land development; this includes impacts on cultural heritage items and places as well as archaeological sites and deposits. The EP&A Act requires that Local Governments prepare planning instruments (such as Local Environmental Plans [LEPs] and Development Control Plans [DCPs]) in accordance with the Act, to provide guidance on the level of environmental assessment required.

#### 2.2.1 Newcastle Local Environment Plan 2012

Heritage items listed on the Sydney LEP 2012 are managed in accordance with the provisions of Section 5.10 Heritage Conservation of this LEP. Under Clause 5 of this section of the Newcastle LEP 2012:

- (4) 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).
- (5) The consent authority may, before granting consent to any development:
- (a) on land on which a heritage item is located, or
- (b) on land that is within a heritage conservation area, or
- (c) 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.

Schedule 5 of the Newcastle Local Environmental Plan 2012 includes a list of items/places of heritage significance within this LGA.

The following **heritage-listed item** is located within 100 metres of the study area and are listed on Schedule 5 of the Newcastle LEP 2012:

• St. John's Presbyterian Church (LEP Item #I257)

# 2.3 Non-Statutory considerations

# 2.3.1 Register of the National Estate

The Register of the National Estate (RNE) is no longer a statutory list; however, it remains valuable as an archive and sign of community esteem.

There are **no items** in or within 100m of the subject site which are listed on the Register of the National Estate.

# 2.4 Summary of heritage listings

A summary of the heritage listing is provided in Table 1. The subject site can be seen in proximity to the listed heritage items below in Table 1.

Figure 2: Map showing heritage items in the Mayfield Area shaded in brown. The subject site is outlined in red



Table 1: Register search results for heritage items within 100 metres of the study area.

ltem	Address	Significance	Listing	Place ID	Item Type
Study area	14 Sunderland Street, Mayfield	Not assessed	Not heritage listed		Built
St. John's Presbyterian Church	33A Hanbury Street, Mayfield	Local	Newcastle LEP 2012	1257	Built

# 2.4.1 St. John's Presbyterian Church

The following statement of significance has been extracted from the SHI listing for the St. John's Presbyterian Church (LEP #I257).

Allows interpretation into the importance of religion in the social and cultural life of the community. Internal fabric of note.

# 3.0 HISTORICAL CONTEXT

# 3.1 European history of Newcastle

#### 3.1.1 Newcastle in the early 1800s

A convict settlement was established at Newcastle in 1801 and from then until 1821 the area was constrained with development limited to the area east of Church Hill. A government farm was located near Honeysuckle Point and was one of the few developments established outside of the main settlement, its location being approximately 1 ½ miles to the west.

## 3.1.2 Early settlement 1823-1853

In 1819, Governor Macquarie proposed to expand land grant opportunities by allowing free settlers to occupy land in Newcastle and the Hunter Valley, signalling the closure of the Newcastle penal settlement in 1822.<sup>1</sup> In 1823, Henry Dangar produced a new survey of Newcastle and its port with the purpose of creating an improved town plan where previously the convict settlement had been situated.<sup>2</sup> Thereafter, applications to occupy town land commenced.

Until the 1850s, Brown Street was the western-most street of the Newcastle town settlement. The city centre then expanded with the development of commercial buildings and associated activities. Blane Street (later Hunter Street West) was preferred by businessmen, such as butchers, shoemakers and hoteliers, who purchased the lots at higher prices amongst the residences and residential-commercial premises.<sup>3</sup> Land along the harbour and Hunter Street developed slowly as settlers strived to create economic abundance from their land grants. Government owned coalmining dominated Newcastle, and the decline in industries such as lime burning and timber getting fuelled the growth of coal exports and the industries associated with mining.

## 3.1.3 Australian Agricultural Company (A.A.Co.) and the expansion of settlements

The A.A.Co. was established in 1824. In 1825, the British Government granted a 2,000 acre lease to the A.A.Co., incorporating iron and coal mines, immediately west of the town of Newcastle.<sup>4</sup> This grant prohibited sale or subdivision, which restricted any development of the town to the west of Brown Street.<sup>5</sup> However, from 1853, subdivision of the A.A. Co. land was permitted, and the sales boosted the development and expansion of Newcastle's township. With the expansion of land holdings further west along Blane Street, plus its proximity to the harbour, roads and railways, interest in the Newcastle West area grew. When the government approved lease of the mines to private interests, transport systems were developed privately to service these, and the Great Northern Railway between Newcastle and East Maitland was begun in 1894.<sup>6</sup> As the railway network and expansion of Newcastle's coalfields developed, the burgeoning coal industry supported Newcastle's growth throughout the late 19<sup>th</sup> century.

<sup>&</sup>lt;sup>6</sup> Suters Architects, 1997.



.

<sup>&</sup>lt;sup>1</sup> Turner, J. W. 1977. Coalmining and Manufacturing in Newcastle, 1797 - 1900. (Doctor of Philosophy). University of Newcastle, Newcastle.

<sup>&</sup>lt;sup>2</sup> Suters Architects, 1997. Newcastle City Wide Heritage Study 1996-97. Volume 1: Study Report and Recommendations.

<sup>&</sup>lt;sup>3</sup> Higginbotham, 2015. Newcastle Archaeological Management Plan Review.

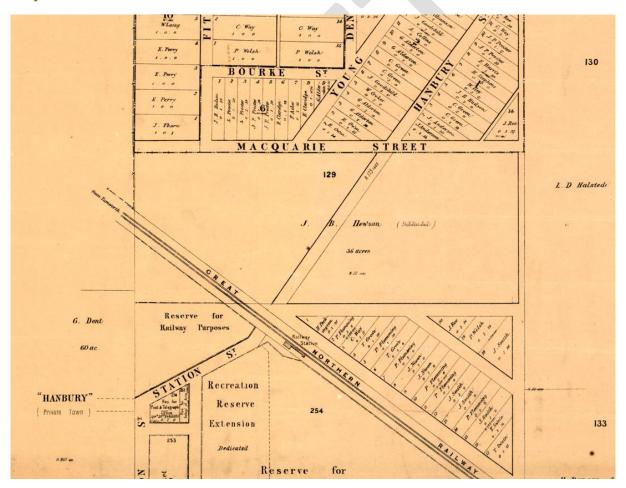
<sup>&</sup>lt;sup>4</sup> Turner, 1977.

<sup>&</sup>lt;sup>5</sup> Higginbotham, 2015.

#### 3.2 The early village of Waratah (Mayfield)

Many villages developed around the expanding coalfields and railway systems of Newcastle. One of the first settlers in the Waratah district was John Laurio Platt, a farmer and coal miner who arrived in Newcastle around 1821. His land was sold for £6000 to the A. A. Co. in 1836 by his son.<sup>7</sup> In 1843 Thomas Grove purchased £200 of land, part of which was bounded by Turton Road, Platt, Bridge and High Streets, and commenced timber-getting and farming there.<sup>8</sup> Around 1857, several other men who were timber-getters for the Great Northern Railway and Wallsend Co. Railway settled in the area near Smart and Bridge Streets. In the 1860s, 36 acres of land in Waratah was granted to J.B. Hewson, which included the subject site (3). In 1862 the first shipment of 24 bags of coal mined from the Waratah Coal Company pit left Newcastle's port.

Figure 3: 1884 Plan of the Village of Waratah, Parish of Newcastle, County of Northumberland showing subdivisions surrounding the land grant held by J.B. Hewson in the location of the subject site.



<sup>&</sup>lt;sup>8</sup> Cudden, M, 2019, A History of Waratah (Mayfield) through The Newcastle Chronicle: 1861-1871, p.7.



<sup>&</sup>lt;sup>7</sup> Newcastle Morning Herald and Miners' Advocate (NSW: 1876-1954), Waratah's First Settlers: Mr. Braye reviews early history. 3 October 1936, p.5.

#### 3.3 The subject site: 14 Sunderland Street, Mayfield

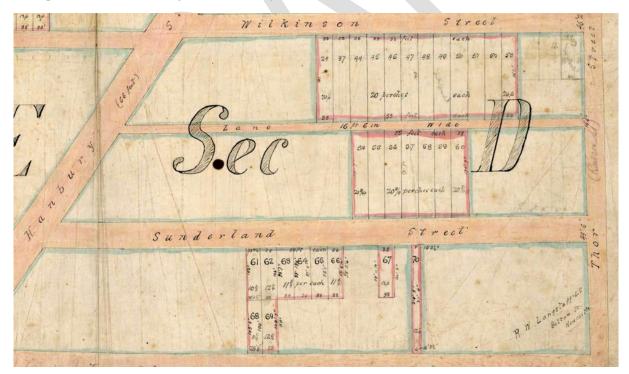
The subject site is thought to be one of the oldest residences that exists in Sunderland Street today.9

#### 3.3.1 Mr. Thomas A. I. Braye

Thomas Alfred Inglis Braye is thought to have lived at the property in Sunderland Street. Hunter District Water Board rates from 1902 to 1904 indicate that the home was owned and occupied by members of the Braye family, with ownership seeming to transfer between Thomas and his wife, Sarah. Neighbouring properties in Sunderland Street were listed as being 'land' rather than 'homes' indicating that the dwelling house at No. 14 is likely to have been one of the earliest occupied properties in the street.

Born 1870 in Waratah, Thomas Alfred Inglis Braye was the son of Thomas Alfred Braye [Snr] whose family settled early in Waratah village. Educated at Waratah Public School, then St. James School (also known as Church of England Grammar School, North Sydney), Braye became a solicitor in 1895.10 In 1899 he established a practice in King Street, and a few years later partnered with H.M.Cohen, moving to a larger office in Bolton Street, where the business still exists today. He held the position of Alderman and Mayor, several times, for Waratah Council. Braye was a bowling enthusiast, a founding member of Waratah Bowling Club, and was also a prominent Freemason. Braye Park was named in honour of his contributions to the Waratah community.

Figure 4: n.d. Subdivision plans of Waratah, M. Roe and Son Hamilton R.W. Langstaff (Source: **Living Histories, University of Newcastle)** 



<sup>&</sup>lt;sup>10</sup> Newcastle Šun (NSW 1918-1954), People we know: popular solicitor, Mr T.A.I. Braye. Monday 19 March 1923, p.4.



<sup>&</sup>lt;sup>9</sup> Local Heritage Item Community Nomination, provided by City of Newcastle. 10/02/2023.

SIDE STREET 10 SEC. D 20 11 Haldud RAWSON 30 29 28 21 31 SUNDERLAND STREET 35 37 34 33 32 43 0 c

Figure 5: 1862 land subdivision, Waratah and Mayfield NSW (Source: Living Histories, University of Newcastle, M3458)

Figure 6: 1971 Charting Map of the village of Waratah and adjoining lands showing Sunderland Street (Source: Historical Land Records Viewer).

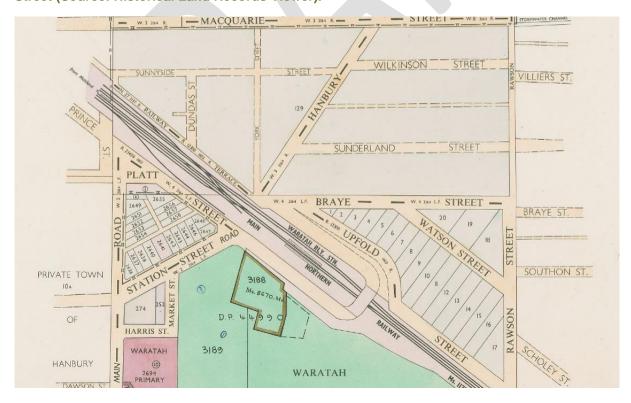


Figure 7: Photograph of the front of 14 Sunderland Street c.1954-1964 (Source Local Heritage Item Community Nomination. 10/02/2023).



# 3.3.2 Comparative analysis

The following provides a comparison of the 14 Sunderland Street building with other similar buildings from the suburb of Mayfield.

**Table 2: Comparative analysis** 

Address

14 Sunderland Street, Mayfield, 2023

Heritage Listing Description and and Significance

No current heritage listing

Former residence of the prominent Mayfield citizen Thomas Braye.

Mid Victorian single storey brick residence with rendered wall finish on the front elevation and decorative quoining on the corners. Windows and sills have decorative mouldings. Original roof form and retained cast iron verandah posts

#### Address

# Heritage Listing Description and and Significance

#### Burrandulla

Newcastle LEP I277

Built for John Ritchie who was the Manager of Hudson Bros.

Single storey stucco wall finish with faceted bay windows facing street frontage. Windows to bay are round arched with decorative mouldings over. The eaves have decorative brackets under a hipped roof structure with slate tiles. Dominant stuccoed chimney tops. Front verandah is supported by low wide arches. Cast-iron fringing and bracketting to verandah. Interiors are also substantially intact.

- Associated with prominent local citizen
- Demonstrating the development of social class and economic growth of the region
- An important element within the streetscape
- Interiors of interest

Current use: Private residence



2 Pitt Street, Mayfield





4 Pitt Street Mayfield

## Burgman House Newcastle LEP I278

Two storey cement rendered building with segmented arches to windows and main entry door. Defined sill projecting and emphasising front main windows. Balcony to upper level supported on slender pots with horizontal timber weatherboards. Roof with corrugated metal sheeting over a simple hipped structure.

- Possibly associated with prominent local citizen
- An important element within the streetscape with interiors of interest

Current use: Affordable student accommodation

#### Address

# Marina Marina

6 Highfield Street, Mayfield

# Heritage Listing Description and and Significance

# **Mayfield House**

Newcastle LEP I262

John Scholey owned much of the land around Mayfield, and the suburb was named after his daughter, May. This house, often referred to simply as Scholey's House, was constructed for him in the late 19th century. He was also at one time an alderman and mayor of Waratah. Bought by Mayfield Baptist Homes Trust in the 1950's and became a hostel for industrial apprentices, named in honour of Essington Lewis, former chairman of BHP.

Substantial two storey building in decorative rendered masonry with tiled hipped roof. Verandahs have been enclosed and modern buildings constructed immediately adjacent to it, which obscure some of it's features. Includes some mature trees in garden.

- Demonstrates the growth and development as an attractive residential area in the late 19<sup>th</sup> and early 20th century
- Internal fabric of note

Current use: Affordable accommodation



21 Highfield Street, Mayfield

#### Winhara

Newcastle LEP I263

Two storey stucco wall finish with two storey bay window facing streets. The windows to the bays have both rounded and segmental arch with decorative label moulds over. The verandahs and balconies have slender cast-iron posts and panels. Steep gabled roofs with decorative "lace-like" bargeboards and slate roofing. Wood turned finials to gable ends.

- Reputably one of the oldest surviving houses in Mayfield
- Internal fabric of note

Current use: Private residence

## Address

# Heritage Listing Description and and Significance



61 Crebert Street, Mayfield

#### Ingall House Newcastle LEP I285

Two storey late Victorian villa of brick with decorative rendering. Iron lace on upper balcony. Extensively renovated inside but still retains cedar doors, staircase, original fireplace and coloured glass fanlights.

- Reputably one of the oldest surviving houses in Mayfield
- Internal fabric of note

Current use: Private residence



143 Crebert Street, Mayfield

#### Wincourt

Newcastle LEP I1249

Built for William Arnott and in 1898 was sold to Issac Winn. In 1921 the building was acquired by the Church of England and used as a Girl's Home. Later it was bought by the Methodists and used as an Old Aged Peoples Home.

Single storey masonry building with slender cast-iron posts supporting roof over verandah and decorative cast-iron panels and brackets. Segmental arched windows and fanlight to main entry door. Formal path leading to house.

- Associated with prominent local family. Significant as part of the group of substantial and early houses along this section of Crebert Street.
- Internal fabric of note.

Current use: Private residence

# 3.4 Summary of comparative analysis

The above examples of locally listed heritage items and the subject site at 14 Sunderland Street have several common attributes. They were all originally constructed as residential accommodation during various periods of the growth of the suburb of Mayfield as it evolved from largely semi forested scrubs and fields into a working class town, capitalising on its location between the Hunter River and the rail line, which made it attractive to industries that needed to transport goods such as steel and coal.

The comparative examples are generally intact examples of early residential dwellings that were associated with prominent citizens of the Mayfield / Waratah area and have retained the integrity of their built form, making a positive contribution to the streetscape.

Although it was not possible to access the internal rooms of 14 Sunderland Street to inspect the condition of the interior fabric, the preliminary assumption is that the layout of the original four room house is intact and that there is evidence from recent real estate photography that decorative elements in the rooms such as fireplaces and ceiling cornices have been retained.



# 4.0 PHYSICAL CONTEXT

# 4.1 Site Inspection

A site inspection was conducted from the public domain on the 20<sup>th</sup> February 2024 by Artefact Heritage and Environment. No internal inspection was carried out.

# 4.2 Description of 14 Sunderland Street, Mayfield

The single storey dwelling on the site at 14 Sunderland Street Mayfield is a relatively intact example of a mid 19<sup>th</sup> Century house which was built on land which formed part of the Waratah Subdivision released between 1862 and 1937. The house is located at the western end and on the northern side of Sunderland Street. The topography of Sunderland Street and the surrounding streets is flat, and the dwellings are generally single storey and set back from the street frontage with small lawns or gardens behind low brick walls or timber picket fences. The house is located on a lot that is the width of two standard lots with a double street frontage, which is believed to reflect the original subdivision plan. The block is accessible from Sunderland Street to the south and a rear lane to the north.

The house is single fronted with a gabled roof and a transverse gable addressing the street. The original four room plan of the single storey house is believed to be retained internally. The house is constructed of brick masonry which is rendered to resemble sandstone blocks, with articulated quoined corners on the street façade. The brickwork on the eastern and western elevation is painted in the same colour as the render. The window surrounds feature decorative sills and mouldings, however the original double hung windows and timber front door have been removed and replaced with aluminium windows and a more contemporary style timber entrance door.

The roof of the house is corrugated metal sheet painted green, which is not the original roof material. Historic photos indicate that the original roof cladding may have been slate. There is a skillion verandah roofed with the same painted metal sheet as the main roof and one brick chimney which been retained. The verandah profile is not the original bull nosed profile evident in the historic photos, however the cast iron columns appear to be original. The cast iron valence on the verandah is missing as are the decorative barge boards on the roof gables.

The house has undergone modifications at the rear in the form of skillion roofed additions clad in fibro cement sheet with roof sheets that match the main roof. There is a small fibro clad shed at the rear of the site. Significant amount of vegetation has been recently removed from the site with only on tree remaining at the front of the site. The low brick boundary wall on the Sunderland Street frontage is a modification to the earlier timber pocket fence as evidenced by historic photos.

# 4.2.1 Exterior

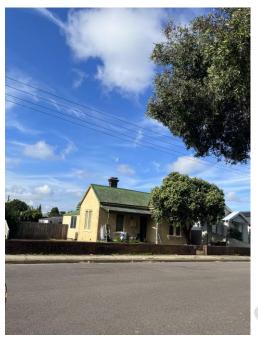


Figure 8.:14 Sunderland Street Mayfield side west elevation viewed from the south side of **Sunderland Street** 



Figure 9. 14 Sunderland Street Mayfield front south elevation viewed from the south side of **Sunderland Street** 



yard and existing brick boundary wall



Figure 10. 14 Sunderland Street Mayfield front Figure 11. 14 Sunderland Street Mayfield front gabled roof and decorative mouldings around the windows

# 5.0 PRELIMINARY SIGNIFICANCE ASSESSMENT

# 5.1 Methodology

#### 5.1.1 Assessing significance

Determining the significance of heritage items is undertaken by utilising a system of assessment centred on the *Burra Charter* (Australia ICOMOS 2013) and the NSW Heritage guidelines *Assessing Heritage Significance* (DPE 2023).

If an item meets one of the seven heritage criteria at the local or state level, as outlined by the Heritage Council of NSW, it can be considered to have heritage significance (see Table 3). If it meets two criteria at the 'state level' it may be considered for listing on the SHR.

'State heritage significance'—'A State Heritage Register listing recognises a place or object as significant for all of NSW. The listing is assessed and recommended by the Heritage Council of NSW and made under the Heritage Act 1977 by the NSW Minister'. 11

'Local heritage significance'—'A local heritage listing recognises the place has significance to a local area and/or community. The listing is included in a local environmental plan or state environmental planning policy and made under the Environmental Planning and Assessment Act 1979'. 12

Table 3. NSW Heritage Council's heritage assessment criteria

Criteria	Description
A – Historical Significance	An item is important in the course or pattern of the local area's cultural or natural history.
B – Associative Significance	An item has strong or special associations with the life or works of a person, or group of persons, of importance in the local area's cultural or natural history.
C – Aesthetic or Technical Significance	An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the local area.
D - Social Significance	An item has strong or special association with a particular community or cultural group in the local area for social, cultural or spiritual reasons.
E - Research Potential	An item has potential to yield information that will contribute to an understanding of the local area's cultural or natural history.
F - Rarity	An item possesses uncommon, rare or endangered aspects of the local area's cultural or natural history.
G - Representativeness	An item is important in demonstrating the principal characteristics of a class of NSW's cultural or natural places of cultural or natural environments (or the cultural or natural history of the local area).

#### 5.1.2 Assessing integrity

Integrity is a measure of the wholeness and intactness of the place and its attributes. Examining the conditions of integrity, therefore requires assessing the extent to which the subject site or element:

a) includes all elements necessary to express its heritage significance,

<sup>&</sup>lt;sup>12</sup> Heritage NSW, 2023A. Assessing Heritage Significance.



\_

<sup>&</sup>lt;sup>11</sup> Heritage NSW, 2023A. Assessing Heritage Significance.

- b) is of adequate size to ensure the complete representation of the features and processes which convey the property's heritage significance,
- c) suffers from adverse effects of development and/or neglect.

**Table 4: Levels of Integrity** 

Grading	Justification	
High	The physical fabric of the property and/or its significant features is in good condition, and the impact of deterioration processes controlled. A significant proportion of the elements necessary to convey the totality of the heritage significance conveyed by the property is included <sup>13</sup> .	
Moderate	The physical fabric of the property and/or its significant features have undergone some modifications. The changes may be reversible.	
Low	The physical fabric of the property and/or its significant features have undergone substantial modifications and the original is irretrievable.	
N/A	Modern and/or intrusive fabric.	
Unknown	Elements that cannot be evaluated (i.e. natural ventilation systems where their continued operation cannot be determined, fabric that cannot be inspected).	

# 5.1.3 Levels of significance for site components

Individual areas and elements of the subject site have been assessed and a level of significance has been applied. This detailed assessment is provided to enable decisions on the future conservation and development of the place.

Five levels of cultural significance have been used in the assessment of the residential building on the subject site. These categories have been developed based on *Assessing Heritage Significance*, <sup>14</sup> prepared by Heritage NSW, and the categories provide a framework for conservation policies, interpretation and recommended treatment of the fabric.

**Table 5: Gradings of cultural significance** 

Level	Justification	Status
Exceptional	Where an individual element is assessed as making a rare or outstanding contribution to the overall significance of the place [and exhibits] a high degree of intactness and quality. Minor alterations or degradation may be evident but does not detract from the overall significance of the place. Demolition/removal of the element would diminish the heritage significance of the place.	Fulfills criteria for local or state listings
High	Where an individual element is assessed as making considerable contribution to the overall significance of the place and exhibits] a considerable degree of intactness and [was] originally of substantial quality. Considerable alteration may have been undertaken, which may alter the presentation and completeness, but does not detract substantially from the overall significance of the place. Demolition/removal of the element would diminish the heritage significance of the place.	Fulfills criteria for local or state listings

<sup>&</sup>lt;sup>14</sup> Heritage NSW, 2023A. Assessing Heritage Significance.



\_

<sup>&</sup>lt;sup>13</sup>. Sheridan Burke, The long and winding road: a challenge to ICOMOS members, in *Changing World, Changing Views of Heritage: heritage and social change* ICOMOS, 2010

Level	Justification	Status
Moderate	Where an individual element is assessed as making a moderate contribution to the overall significance of the place [and exhibits] considerable alteration and/or degradation which detracts from the overall significance of the place. Elements which were of some intrinsic quality but are relatively intact may be included. Elements with little heritage value but contribute to the overall cumulative significance of the place may also be included. New elements of high-quality design and aesthetic value may be considered to contribute to the significance of the place. Demolition/removal of the element may diminish the heritage significance of the place. Elements or spaces can be altered or adaptively reused.	local or state
Little	Where an individual element is assessed as making a minor contribution to the overall significance of the place, particularly compared with other elements [and exhibits] extensive alterations or degradations which impact their significance and ability to interpret. New elements of little intrinsic quality or aesthetic value may be considered in this category. Demolition/removal of the element would not diminish the heritage significance of the place. Elements or spaces can be altered or adaptively reused.	Does not fulfill criteria for local or state listings
Intrusive	Where an individual element is assessed as detracting from the appreciation and overall significance of a place. The element may be adversely affecting or obscuring other significant areas, elements, or items. Demolition/removal of the element is recommended.	Does not fulfill criteria for local or state listings

The below analysis integrates the historical analysis with the physical condition and integrity of the remaining building fabric to provide a significance assessment in accordance with the NSW Heritage Criteria.

# 5.2 Preliminary Significance Assessment

A preliminary assessment of the heritage significance of 14 Sunderland Street is included in Table 4 below.

Table 6. Significance assessment for 14 Sunderland Street, Mayfield.

Criteria	Assessment
A – Historical Significance	The house is significant as one of the earliest houses constructed in the Mayfield/ Waratah area c.1880. It has largely retained its original built form including the original four room layout. There have been some minor additions and modifications over time.
	The dwelling is likely to reach the local significance threshold under this criterion.
B – Historical Association	The dwelling is the former residence of Thomas Braye, a prominent figure in civic affairs in the Mayfield area.
	The dwelling is likely to reach the local significance threshold under this criterion.
C – Aesthetic, Creative or Technical Achievement	The Mid Victorian residential dwelling is an early, but not outstanding, example of the architectural design or technical achievement. The house has undergone modifications resulting in the loss of some original fabric and features.
	The dwelling is unlikely to reach the local significance threshold under this criterion.

Criteria	Assessment
D – Social, Cultural and Spiritual Significance	Braye was a practicing solicitor with the firm Braye, Cragg Cohen, and Chapman, as well as being a former mayor of Waratah, leader in the freemasons and author of the book <i>The History of Waratah</i> (1936). Braye was a founding member of the Waratah Bowling Club, and also a prominent Freemason. Braye Park was named in honour of his contributions to the Waratah community.  The dwelling is likely to reach the local significance threshold under this criterion.
E – Research Potential	The subject site is considered to have low research as the land appears to have been used as a residence since the subdivisions were released in the mid 19th century.  The dwelling is unlikely to reach the local significance threshold under this criterion.
F – Rare	The house represents one of the earliest residential structures in the Mayfield Waratah subdivision.  The dwelling is likely to reach the local significance threshold under this criterion.
G - Representative	The house is representative of the evolution of the suburbs of Mayfield and Waratah from agricultural to industrial settlements and is a relatively intact example of the style of mid Victorian architecture.  The dwelling is likely to reach the local significance threshold under this criterion.

# 5.3 Integrity

Integrity relates to whether all the attributes that convey heritage significance are extant within the subject site and not eroded or under threat.<sup>15</sup> Summary gradings of Significance and Integrity

A summary of the significance and integrity of 14 Sunderland Street is included in Table 7.

Table 7: Gradings of Significance and Integrity for 14 Sunderland Street, Mayfield

Component	Significance	Integrity
Structural form and intactness	High	Moderate
Contribution to streetscape	High	High

# 5.4 Preliminary statement of significance

The house at 14 Sunderland Street Mayfield is significant as potentially being one of the earliest houses constructed in the Mayfield/ Waratah area, c.1880. It has largely retained its original setting in the street as well as the built form including the original four room layout. There have been some minor additions and modifications over time.

The house was formerly occupied by Thomas Braye, a prominent figure in civic affairs in the Mayfield area. Braye was a practicing solicitor with the firm Braye, Cragg Cohen, and Chapman, as well as being a former mayor of Waratah, leader in the freemasons and author of the book *The History of* 

<sup>&</sup>lt;sup>15</sup> Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, ICOMOS 2011, p10.



1

*Waratah* (1936). Braye was also a founding member of Waratah Bowling Club, and a prominent Freemason. Braye Park was named in honour of his contributions to the Waratah community.

The dwelling house at 14 Sunderland Street is likely to reach the local significance threshold under Criteria (a), (b), (d), (f) and (g).



# 6.0 CONCLUSION AND RECOMMENDATIONS

#### 6.1 Conclusions

This preliminary assessment has identified the following:

- 14 Sunderland Street has historical significance as one of the earliest residences constructed on the Mayfield/ Waratah subdivision and is associated with a former mayor of Waratah and prominent citizen of the area - Thomas Braye
- Although the individual structure may not represent an outstanding example of the Mid
  Victorian architectural style, the house represents an early example of one of the core
  architectural phases of Newcastle and the early development of the suburbs of Mayfield and
  Waratah. It represents an example of the growth and development of Mayfield as an attractive
  residential area in the late 19th and early 20th centuries
- The integrity of the structure, form and setting of the house and its curtilage have been generally retained and it contributes to the visual connections between houses along of Sunderland Street, which are largely examples of early 20<sup>th</sup> century design and construction
- The physical fabric of the property at 14 Sunderland Street and its original significant features have undergone some modifications, however the changes may be reversible (pending internal inspection).

Overall, this preliminary assessment has concluded that the dwelling house at 14 Sunderland Street be considered for listing as a local heritage item on Schedule 5 Environmental Heritage on the Newcastle LEP 2012.

#### 6.2 Recommendations

- It is recommended that a Heritage Assessment of the property be undertaken to confirm the integrity of internal fabric and confirm the overall significance of the property.
- If listed as an item of local heritage significance the street frontage and original four room area
  of the house should be retained, allowing for sensitively designed alterations and additions at
  the rear of the site. It is foreseeable that a heritage listing would still allow for more lenient
  parameters for new architectural design at the rear of the site, in the form of extension or
  additions.

# 7.0 REFERENCES

Apperly, R., Irving, R., Reynolds, R. (1989) *A pictorial guide to identifying Australian architecture:* styles and terms from 1788 to the present. Angus & Robrtson, North Ryde.

Awabakal LALC (2022) https://www.awabakallalc.com.au/.

Cary. H. (2010) Threlkeld, Biraban and the Colonial Bible, University of Newcastle.

City of Newcastle (2018) Aboriginal Heritage Management Strategy 2018-2021. Considering Country

City of Newcastle (2020) Newcastle Heritage Strategy 2020-2030.

Cudden, M (2019) A History of Waratah (Mayfield) through The Newcastle Chronicle: 1861-1871, with brief history from 1827. Compiled for Cultural Collections, University of Newcastle.

Dangar, H. (1828) Index and directory to map of the country bordering upon the River Hunter, London.

Department of Planning and Environment (2023) Assessing Heritage Significance: guidelines for assessing places and objects against the Heritage Council of NSW criteria.

Fawcett, (1898) Customs of the Wonnah-Ruah Tribe, and their Dialect or Vocabulary. Accessed <a href="https://livinghistories.newcastle.edu.au/nodes/view/57508">https://livinghistories.newcastle.edu.au/nodes/view/57508</a>.

Higginbotham, E. (2015) Newcastle Archaeological Management Plan Review.

Hunter Living Histories (nd) *Dreaming*. https://hunterlivinghistories.com/dreaming/.

Maynard, J., Gilbert, J., Fielding, S., and Kelly Jnr, R. (2021) Lower Hunter Freight Corridor Investigation. Report to Transport NSW.

Miromaa Aboriginal Language & Technology Centre (2020) "Awabakal Dictionary: Community Edition."

'Mulubinba - Place of Sea Ferns';

http://www.theuniversitygallerynewcastle.com.au/uploads/2/3/9/6/23967429/full exhibition inf o mulubinba web.pdf.

Ray, G. (2020, 2019) Robert Sneesby's eyewitness account of old Newcastle. Retrieved from https://www.phototimetunnel.com/robert-sneesbys-eyewitness-account-of-old-newcastle.

Reedman, L (2008) Early Architects of the Hunter Region: a hundred years to 1940.

SixMaps (2024).

Suters Architects, (1997) Newcastle City Wide Heritage Study 1996-97. Volume 1: Study Report and Recommendations.

Turner, J. W. (1977) Coalmining and Manufacturing in Newcastle, 1797 - 1900. (Doctor of Philosophy). University of Newcastle, Newcastle.

University of Newcastle Special Collections (2013) "The many names of Newcastle – Mulubinba." Hunter Living Histories, accessed on 8 July 2022 via https://hunterlivinghistories.com/2013/08/30/the-many-names-of-newcastle-mulubinba/

Wilkes, C. (1845) Narrative of the United States Exploring Expedition, Lea & Blanchard, Philadelphia, US.

Worimi Conservation Lands (nd.) https://worimiconservationlands.com/





Artefact Heritage
ABN 73 144 973 526
Suite 56, Jones Bay Wharf
26-32 Pirrama Road
Pyrmont NSW 2009 Australia
+61 2 9518 8411
office@artefact.net.au
www.artefact.net.au

# ATTACHMENT D

Notice of Motion 9.4 Protecting and Valuing Newcastle's Heritage City of Newcastle 28 November 2023

#### 9.4. PROTECTING AND VALUING NEWCASTLE'S HERITAGE

COUNCILLORS: E ADAMCZYK, D CLAUSEN, N NELMES,

D RICHARDSON, P WINNEY-BAARTZ AND M WOOD

#### **PURPOSE**

The following Notice of Motion was received on Wednesday 15 November 2023 from the abovementioned Councillors.

# **MOTION**

#### Part A

That the City of Newcastle values the unique heritage and character of its buildings, streetscapes and landscapes, noting that:-

- Schedule 5 of the Newcastle Local Environment Plan 2012 identifies certain areas of townscape and landscape that collectively have special heritage qualities, as Heritage Conservation Areas (HCAs);
- Each HCA is described at Part E of the City of Newcastle Development Control Plan and includes a Statement of Heritage Significance and a desired Future Character Statement. These Statements identify the existing urban fabric and the key character elements of each HCA which are to be preserved and will act as a guide as to how future development may achieve contextual fit, enhancing the existing qualities of each area;
- In addition, Character Statements for the suburbs of Tighes Hill and Kotara have been included at Part E of the City of Newcastle Development Control Plan. These sections describe the current and future desired character of each suburb. The objective of the Character Statements is to ensure that the design of new buildings, structures, additions and alterations reflects and complements existing and future local character;
- Further, Part F of the City of Newcastle DCP includes specific controls for Places and Precincts, including Wickham (consistent with the adopted Wickham Masterplan), the renewal corridors (Mayfield, Adamstown, Broadmeadow, Hamilton, and Islington), and Minmi precincts, noting unique heritage aspects of each of these precincts.
- The Newcastle City Centre Heritage Conservation Area is the subject of a review with the draft report of the proposed changes on public exhibition from 6 November to 18 December 2023.

## Part B

It is noted that the City of Newcastle is undergoing a growth in its population and a diversification and densification of its housing types. Consistent with our adopted Heritage Strategy and accompanying Heritage Policy, further work needs to be done to protect the heritage and character of the city's buildings, streetscapes and

landscapes by identifying Heritage Conservation Items, Heritage Conservation Areas and preparing Character Statements of suburbs.

Council requests a Memo and Workshop from Officers which:

- 1 Explore the heritage significance of the item at 14 Sunderland Street, Mayfield. Priority should be given to the investigation and assessment noting that a Development Application was lodged last month which proposes its demolition.
- Outline the intended work plan for the remainder of 2023/24 and 2024/25 of investigations and assessment of significant heritage buildings and streetscapes, noting Council's commitment to explore Cameron's Hill (meeting of April 2023) and recently raised matters at Carrington
- Outline the intended work plan for the remainder of 2023/24 and 2024/25 of development of further Character Statements, including options to develop bespoke character statements for Wallsend and New Lambton

	٩C	V C	20	$\sim$		חוי
$\mathbf{D}^{\mu}$	16	NU	7	u	JI.	VU

Nil.

## **ATTACHMENTS**

Nil.