

**PEER REVIEW OF A
HERITAGE ASSESSMENT OF
“THE GABLES”
69 KISSING POINT ROAD
TURRAMURRA**



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FEBRUARY 2018

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EXECUTIVE SUMMARY

This report was commissioned as a peer review of a report by Paul Davies Pty. Ltd. which found that the house at 69 Kissing Point Road lacks heritage significance.

For the purposes of this review the house has been assessed against the criteria gazetted by the NSW Heritage Council, using the its guidelines.

It has representative historical significance at local level as one of the few intact surviving houses from the original subdivision as a residential precinct of Boyd's Orchard, one of the original grants along the ridge which form the historic core of Ku-ring-gai. For this reason alone it has heritage significance, and should be listed as an item of environmental heritage in the Ku-ring-gai Local Environmental Plan 2015 ("the LEP").

It also has representative aesthetic significance at local level as an individually designed house built during the First World War with a blend of Federation Arts and Crafts and Inter-war Californian Bungalow characteristics. This is so despite several oddities, of which some are due to its initial staged construction and some to later alterations, while some have no obvious explanation.

The report by Paul Davies includes no meaningful assessment or recognition of the house's historical significance.

The Davies report found that the house lacks aesthetic significance, on the basis of its architectural quality in comparison with a selection of bungalows built between about 1915 and the late 1930s, either in conservation areas or listed in the LEP. The use of such a benchmark for assessing significance is invalid. Aesthetic significance should be assessed against the guidelines promulgated by the Heritage Council. These do not provide for the use of comparative evaluation for that purpose. Hence the particular selection of items used for the comparative evaluation is irrelevant to the assessment of aesthetic significance.

Comparative evaluation should be used to assess the level (state or local) of significance, if the possibility of state significance exists, which it does not in the present case. It may assist in assessing rarity and representativeness, provided that the class of the item is appropriately defined.

The selection of items for the comparative evaluation, and a suggestion that there is a benchmark of architectural excellence for listing in Ku-ring-gai, do raise wider questions about the distribution and significance of listed and potential items across Ku-ring-gai which Council may wish to pursue.

The house is in poor condition as the downpipes discharge on to the ground, causing the reactive foundation material to move, and attracting the roots of a very large tree on the adjacent property. That tree now appears to be dying and in need of removal. Once the roots under the house have been dealt with, which may take some time, the house will be able to be conserved. It could be sympathetically altered and extended, and the site could be further developed, perhaps substantially, perhaps with reliance on the heritage incentive clause 5.10 (10) in the LEP.

It is recommended that the house be listed in Part 1, Schedule 5, of the LEP.

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1 INTRODUCTION

1.1 Purpose

At its meeting of 18 July 2017, Ku-ring-gai Council resolved to place an interim heritage order (Section 25 NSW Heritage Act 1977) on the property known as “The Gables” at 69 Kissing Point Road, Turramurra (Lot 4 DP 31925 & Lot 20 DP206712) to enable full and proper evaluation of its heritage significance to be made and prevent any harm to the place in the interim.

The property was initially identified as a potential heritage item within a heritage assessment undertaken for Council in 2010 (Paul Davies Heritage Architects 2010 Heritage Conservation Area review – North) and recommended for further investigation.

Paul Davies Pty Ltd completed a heritage assessment report for the place in November 2017. The report concluded that the building does not meet the threshold for heritage listing. At its meeting of 12 December 2017, Council resolved, inter alia, to undertake a peer review of the Paul Davies report and report the findings to Council in early 2018.

This report comprises that peer review, and responds to Council’s brief as set out in its Request for Quotation RFQ055-2017.

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1.2 Scope

The scope of the work set out in the RFQ is as follows:

The responsibilities of the consultant will include but are not limited to the following tasks:

- i. Review and assess the existing information on 69 Kissing Point Road, Turramurra.
- ii. Undertake any additional appropriate historical research as required.
- iii. Undertake necessary site inspection (internal access subject to prior approval from owner).
- iv. Undertake a comprehensive review of the final heritage assessment report on 69 Kissing Point Road, Turramurra, completed by Paul Davies Pty Ltd for Ku-ring-gai Council in November 2017.
- v. Critically analyse the Paul Davies heritage assessment report including its heritage assessment, comparative analysis, conclusions and recommendations.
- vi. The review of the Paul Davies comparative analysis must discuss properties located within the northern sections of the Ku-ring-gai local government area, as well as properties in the southern sections of the local government area.
- vii. Consider the implication of the building condition on the retention of original fabric within the building and the likely impacts to the original fabric of required rectification works.
- viii. Consider the implications of the condition of the property from an ongoing management perspective.

- ix. Prepare a report containing the findings of the abovementioned analysis (iv. and viii.); including a reasoned recommendation as to whether the heritage listing of the property should proceed or be discontinued. The report will also address management options for the property. The report is also required to provide advice to Council as to how it should manage its heritage protection process to ensure that protection is afforded to modest buildings as well as substantial architect designed buildings.
- x. Should the recommendation be to proceed with the heritage listing, prepare an updated State Heritage Inventory form for the property.

With reference to (iii) above, the site and building interior were inspected with the consent and in the presence of the owner, Mr. D. Baikie, on 23 January 2018. Mr. A. Fabbro, Manager Urban Planning, Ku-ring-gai Council. With the owner's agreement the author visited the site again, alone, on 25 January and further examined the exterior of the building.

The briefing document includes a copy of the report which is the subject of the peer review, whose full title is *"The Gables" 69 Kissing Point Road, Turramurra, Heritage Assessment, November 2017, prepared for by Paul Davies Pty. Ltd. for Ku-ring-gai Council*. The brief also includes copies of

- a Preliminary Heritage Assessment dated 31 October 2017 prepared by NBRs Architecture for the property owner
- a report by ACOR Consultants, Engineers, dated 19 October 2017 for the property owner
- a report by Shreeji Consultant, structural and civil engineers, prepared for Ku-ring-gai Council.
- Comments by several members of the Ku-ring-Gai Heritage Reference Committee

These documents have also been considered. Other references consulted are listed at the end of this report.

This report is structured to respond to the brief as follows:

Brief	Report	Brief	Report
i	2., 3	vi	6
ii	2, 3	vii	8
iii	(done)	viii	8
iv	7	ix	5
v	7	x	Appendix

1.3 Authorship

The author is Graham Hall, who is registered as an architect by the Architects Registration Board of New South Wales (No. 2600), and listed as a Conservation Architect and Heritage Consultant by the NSW Heritage Division. His CV is at Appendix C.

Photographs and figures are by Graham Hall unless otherwise noted.

1.4 Planning instruments, heritage status and proximity to heritage items

The relevant planning instruments are the Ku-ring-gai Local Environmental Plan 2015 (“the LEP”) and the Ku-ring-gai Development Control Plan 2016 (“the DCP”). The Ku-ring-gai Local Environmental Plan (Local Centres) 2012 applies to part of Kissing Point Road. The subject site remains subject to the Interim Heritage Order referred to in 1.1 above.

It does not lie within a listed, draft or proposed Heritage Conservation Area. The nearest listed items are the following houses:

- “Bapaume,” 51 Kissing Point Road (item 775)
- “Rudyard,” 53 Kissing Point Road (item 776)
- “Kurrawah”, 54 Kissing Point Road (item 779)
- “Ingalara”, 62 Kissing Point Road (item 778)
- “Bellaire,” 28 Kissing Point Road (item 774).

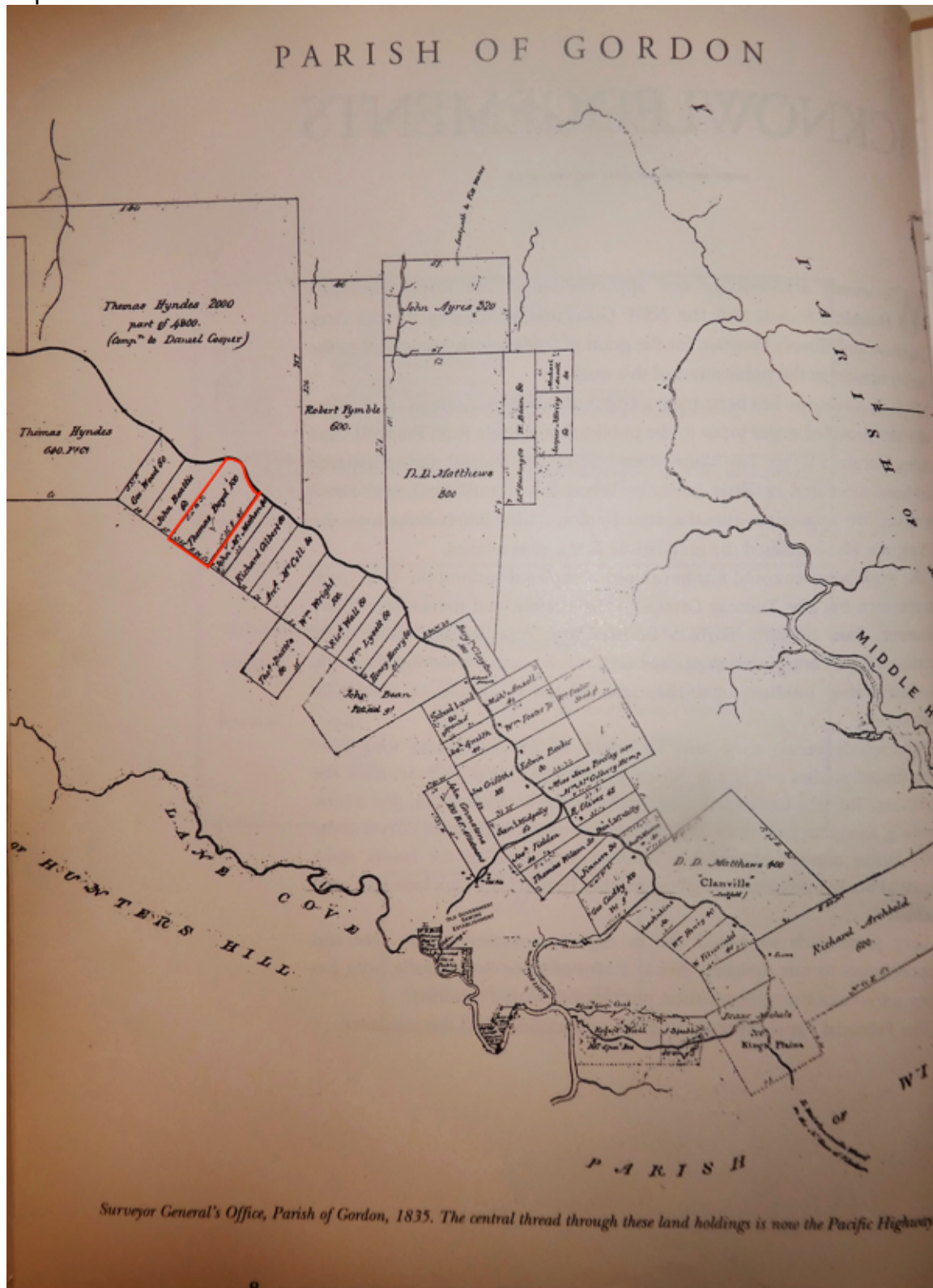


Part of the Ku-ring-gai LEP heritage map, with some items listed in the Ku-ring-gai Local Environmental Plan (Local Centres) 2012 shaded pale beige and 69 Kissing Point Road shaded red. There are very few items to the west and south of the subject house.

2 HISTORY

2.1 Overview of the history of Ku-ring-gai

This chapter does not repeat the details provided in the Davies report or the additional information in the NBRIS report. It expands and comment on certain aspects.

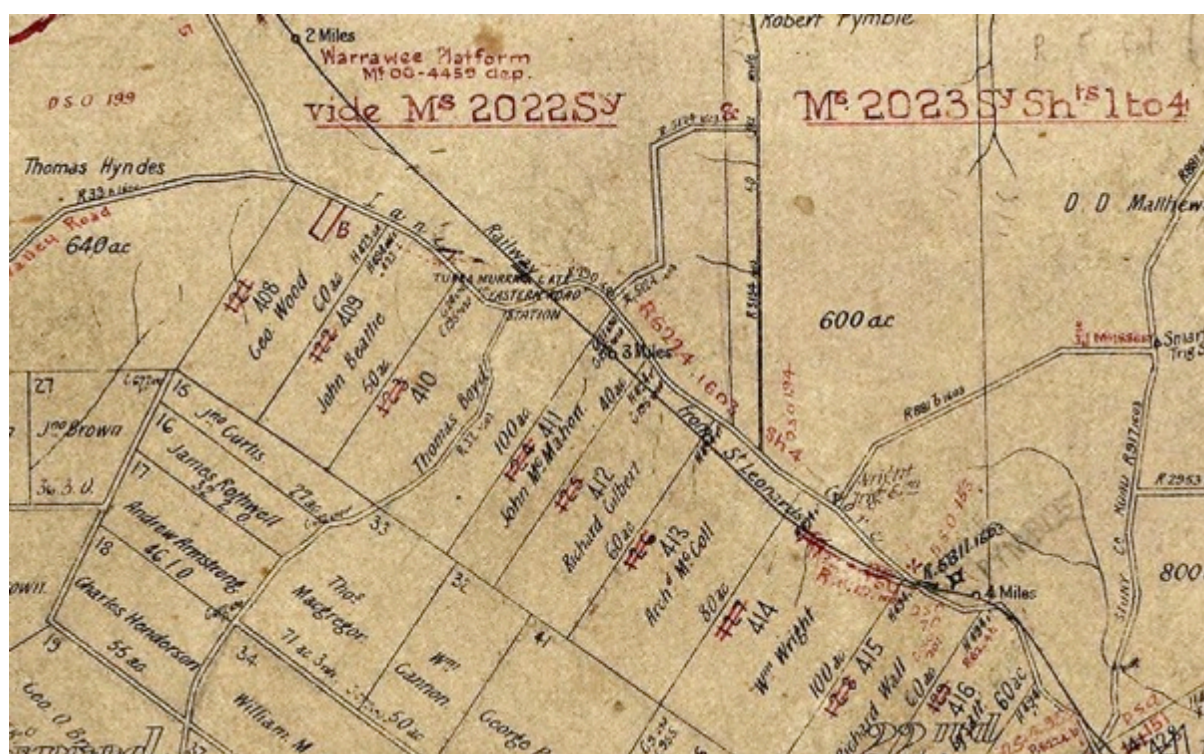


Map of the Parish of Gordon, 1835 Ku-ring-gai Historical Society, *Focus on Ku-ring-gai: the story of Ku-ring-gai's growth and development*, Gordon, 1996. Boyd's grant outlined in red.

The history of Ku-ring-gai may be seen as successive phases: periods of Aboriginal occupation, British settlement, timber-getting, early grants each of the most fertile land along the ridge which became the Pacific Highway, orchards and market gardens, the coming of the railway also following the ridge, early residential development, the rail and road link provided by the Sydney Harbour Bridge, and inter-war suburban growth and post-war rezoning and expansion. The story is well told in *Focus on Ku-ring-gai*.¹

These are common themes in the history and development of the suburbs which comprise Ku-ring-gai. The suburbs nevertheless developed at different rates and times. The key to these differences is the development pattern of the original land grants which form the core of each suburb.

2.2 Suburban development of Ku-ring-gai, Turramurra and Boyd's Orchard



Part of the 1893 map of the Parish of Gordon showing Kissing Point Road

LPI

South Turramurra, centred on the area south-west of the highway which was granted to Thomas Boyd and became his son James' orchard, developed slowly. The soil was poor and the climb to the highway steep.² As elsewhere, the earliest development was on and near the highway. It then extended down Kissing Point Road, the Government Road connecting the ridge to the Lane Cove River. Other streets were laid out when the estate was subdivided, but many were only constructed when the uncleared forests were rezoned in the 1960s. The rates of growth are illustrated in the following table:

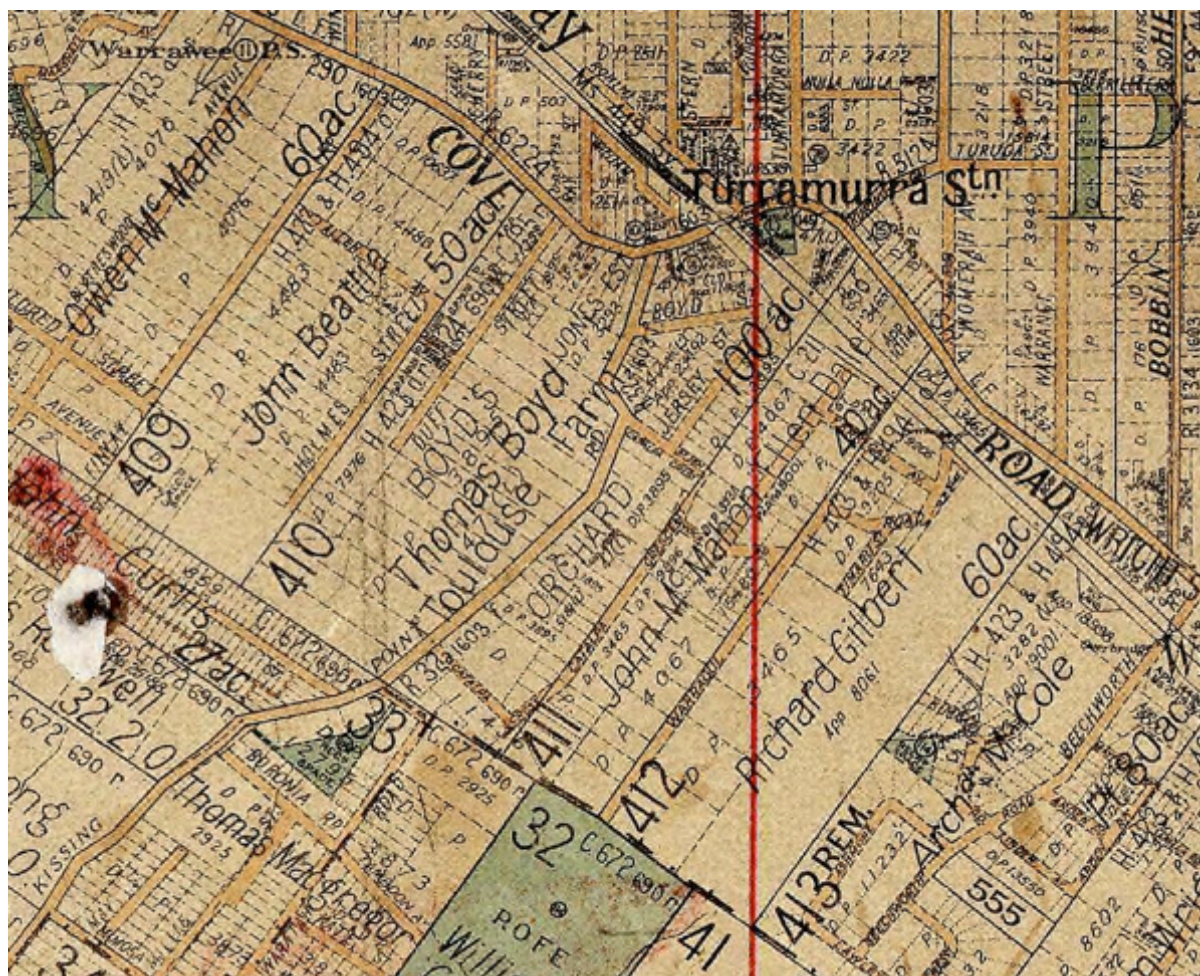
¹ Ku-ring-gai Historical Society, *Focus on Ku-ring-gai: the story of Ku-ring-gai's growth and development*, Gordon, 1996

² Ibid., p. 86.

NUMBER OF HOUSES on NORTH SIDE OF KISSING POINT ROAD BETWEEN PACIFIC HIGHWAY AND MONTEITH STREET as RECORDED IN SANDS' DIRECTORY

1910	1914	1915	1916	1917	1918	1925	1930
3	4	4	9	12	15	15	18

There are approximately 40 buildings on the north side today. Of these, six are recognisably pre-war: three near the highway; No. 39; Nos. 51 and 53; and the subject No. 69.(see Physical Evidence, 3.6.)



Part of the 1910 map of the Parish of Gordon showing the first subdivisions

LPI

2.3 “Green Gables”

Frank Lynch purchased the site in 1915, when it was had a 29 metre frontage to Kissing Point Road and was 306 m deep. Lynch is shown as the occupant in Sands’ Sydney Directory for 1916, but the house was not complete. Lynch invited tenders in the Construction and Local Government Journal of 20 January 1919 under the classification “Alterations and Additions,” but the physical evidence (3.2) and the notation on a photograph mentioned in the NBRs report confirm that the work involved completion of the unfinished house, rather than extensions. In brief, the front veranda was added and some rooms were made habitable.

There is no record of the designer or the builder for either stage. Lynch was a “car builder” – a builder of motor vehicle bodies and railway coaches.

While there is no evidence, it is entirely conceivable, and in my opinion likely, that he applied his trade skills to home building, particularly of some fixtures and detailing, with occasional unusual results.

The site was not subdivided until 1961, when the area north-west of the house was released for suburban development.



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The extent of the site in 1961, overlaid on an aerial photo showing that the hinterland to the north of Kissing Point Road had not been opened up in 1943

LPI



The extent of the site in 1961, overlaid on a recent aerial photo showing the subdivision pattern the north of Kissing Point Road

LPI

3 PHYSICAL EVIDENCE

3.1 Original configuration

The house as completed in or about 1919 was of one storey and had a front veranda, and was thus a bungalow. It was asymmetrical, with the front door facing the street but set back, at the side. There was an inset veranda under the main roof at the rear.

The external walls were generally cavity brick on rock-faced squared coursed sandstone dwarf walls. Examination of the roof and wall junction in the space above the laundry shows that it is the outer skin which was loadbearing, as was commonly the case at the time. The brick at the front was red-brown face work in stretcher bond to about sill level, with face brick quoins and roughcast render above. The side and rear walls were also rendered, with bullnosed face brick window sills.

The internal walls behind the transverse corridor were timber-framed, as were the external walls on the three sides of the inset veranda. This has been enclosed, as discussed below, and there is no record of the cladding, doors or windows. However a short length of the end wall of the enclosed veranda is clad with rusticated checked weatherboards to about 900 mm, with battened fibro sheets above. The same cladding is evident on the derelict shed. It is most likely that the walls of the inset veranda were clad in this way, as were some entire houses of the period. There would have been windows, perhaps a continuous run of casements, between the lounge room and veranda, substituted for fibro panels.

The rear wall of the present kitchen is roughcast rendered like the other external walls, and is described by Davies as having been rebuilt. This wall is in fact timber-framed, on the usual sandstone base. In my opinion it is original, clad with fibro to which the roughcast render has been applied, with chicken wire possibly aiding adhesion. One may speculate that a lack of money or a shortage of bricks accounts for this.

Davies(p. 15) refers to “low-pitched ...gables.” The roof pitch was in my opinion moderately steep at about 34 degrees (2 in 3, easily set out by a carpenter). There were three overlapping offset gables facing the street, one facing each side, and a vented gambrel facing the rear. The roof was covered with unglazed red Marseilles pattern terra cotta tiles with finials. There were two low square flat-topped chimneys.

The gables were clad in battened asbestos cement sheets. (They are not “imitation half-timbered gables” as stated by Davies (p. 19): which have much thicker and wider timbering. The nearest example in the report is Addison Avenue, Roseville, but some examples are literally half timber, which is usually stained black.)

The veranda floor was tinted concrete. The flat veranda roof was probably covered with bituminous felt. It was supported on short square section pots on rock-faced coursed sandstone piers.

Both front windows comprise three leadlight casement panes with panelled skirts below sill level, and are fixed on the outer face of the brick walls and protected by a narrow hood. The small pair of front doors is fully glazed with multiple rectangular pieces of obscure glass set in leadlight making up four panes per door leaf.

Side windows are set within the wall thickness, again casements in groups of three, each with two larger panes, the lower having obscure glass, and two small panes of coloured glass above.

The house provides a relatively early example of the use of “Fibro” or asbestos cement sheets, which began to be imported in about 1912. As well as the gables and cladding the rear veranda walls, it appears to have been used for some internal wall linings.

Brick walls were solid plastered internally. The joints in the internal timber framed walls were covered with battens extending between the skirting board and picture rail, which was at door head height and formed the top architrave to the doors. The side architraves were tapered in elevation. The skirting boards, architraves, cover battens and elements of built-in fixtures were simple rectangular sections, and would have been dark stained. The doors were three-panelled, high-waisted and similarly detailed. Ceilings were patterned fibrous plaster, generally in panels, with decorative cornices.

One room finished differently was the entrance lobby, where the external face brick to mid height is continued, separated from the plastered wall above by a picture rail or ornament shelf at an unusually low height.

Face brickwork was also used on the false or unfinished fireplace in the lounge room. The false chimney breast was panelled and battened as described above.

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Typical three-panelled door, tapered architraves, picture rail at door head height and panelling over door. Originally stained



Entrance lobby with face brick continued from outside, glazed double doors and tapered leadlight window

3.2 Staging of construction

The documentary evidence shows that construction of the house commenced in 1916 and tenders were invited to complete it in 1919. Aspects of the physical evidence confirm that the work was completed in two stages, rather extended than in 1919. Notes on the back of a photograph referred to by NBRS (p. 11) state, “four rooms and back verandah were built in 1913 and the front verandah and two more rooms completed in 1917.” I agree with NBRS that the dates are inconsistent with the documentary evidence. It is not easy to identify which rooms are referred to. However the sense of the words is that the house was completed, not extended. An examination of the structure shows that all the structural brick and timber walls must have been erected before the complex roof, with five gables and a gambrel, was built. But it is certainly possible that some of the timber walls were temporarily clad perhaps with fibro. Ceilings may not have been fixed, and even some flooring may not have been laid, until 1919.

The reason for the staging is not known. Possible reasons include a lack of time or money on the part of Frank Lynch, some kind of contractual difficulty, and wartime shortages of tradesmen and materials, especially imported materials.

The staging readily explains the hood over the window of the first bedroom, which remains under the veranda roof (Davies fig. 16). The window is fixed to the external face of the wall, so a hood was required until the veranda was added. While the detail might have been better resolved, I do not agree that “This suggests the random addition of elements to the building without a resolved design.” It is merely evidence of the staged construction of an intended design.

There is no obvious explanation for the oddities Davies has observed in the dining room, notably the thresholds and slightly lower floor level, and the fireplace in a corner but not splayed to face diagonally across the room. The skirting boards are typical for the late Federation period, but differ from the inter-war style rectangular section skirtings used elsewhere in the house. The change in floor level suggests that the space was intended, and possibly used for a time, as a small inset veranda. In that case the window may not have been installed in the opening until later. The fireplace may have housed, or been intended to house, a fuel stove.

3.3 Alterations

The exterior of the front of the house is almost intact. The red terra cotta Marseilles pattern roof tiles were replaced with the same type, in brown, following a storm in recent decades but the red finials were retained.

The flat roof of the veranda is covered with metal pan roofing, probably replacing built-up bituminous felt which is not very durable.

The front fence is shown in a photograph in the NBRS report as medium height capped piers, probably roughcast rendered brick, with a similar base infilled with top and bottom rails, probably timber with woven wire between them. The style suggests that it was the original fence. The present fence is similar in that it has piers and a base course, but is much lower and the piers appear to be more widely spaced. It is rendered brick, not rendered concrete as stated by Davies.

The wall between the lounge room and the back bedroom is timber-framed and has two offsets, providing a built-in cupboard in the back bedroom. It intrudes into the lounge room, where its detailing suggests a chimney breast or a display cabinet, subsequently blanked off. It does not intersect with the pattern of the ceiling in the lounge room but the dimensions suggest that the wall was originally straight. There certainly have been alterations in this area, but there is no obvious explanation or sequence of events.

There is a similarly detailed servery between the present dining and lounge rooms. Behind a modern facing the original stained timber can be seen. All the joinery would have been similarly stained. It is now painted.

The inset rear veranda was enclosed at an unknown time. The wall and windows between it and the lounge room were removed, either then or later, as there is now a wide opening. An undated photograph in the NBRS report (which cannot be earlier than 1964 when the registration number of the car pictured was issued) shows a set of three casement windows and two single casements all matching others still extant, and an inset pair of doors accessed by steps still in place under the house. This suggests that the windows were re-used from the wall between the lounge room and veranda.

The enclosing wall was in turn removed when a flat-roofed garden room was added in 2003. The drawings for the relevant development application are reproduced below. The opening between the dining and lounge rooms has been widened, and all the walls in this area are now lined with plasterboard.

A toilet has been added, next to the laundry. A passage has been created by reducing the size of the back bedroom or the laundry, with an attic ladder leading to a platform above the laundry and thence into the roof space. The bathroom fixtures and fittings date from the early post war period and the door is modern. The kitchen is also mid-late twentieth century.

The original garage has been demolished and a larger garage constructed in the north-east corner of the site.



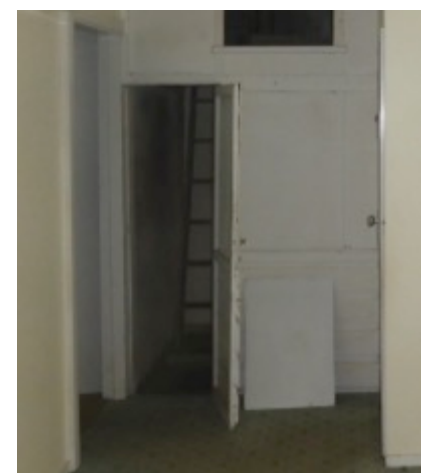
Servery seen from lounge room. Modern panel removed to reveal stained timber joinery. All joinery would have been stained originally.



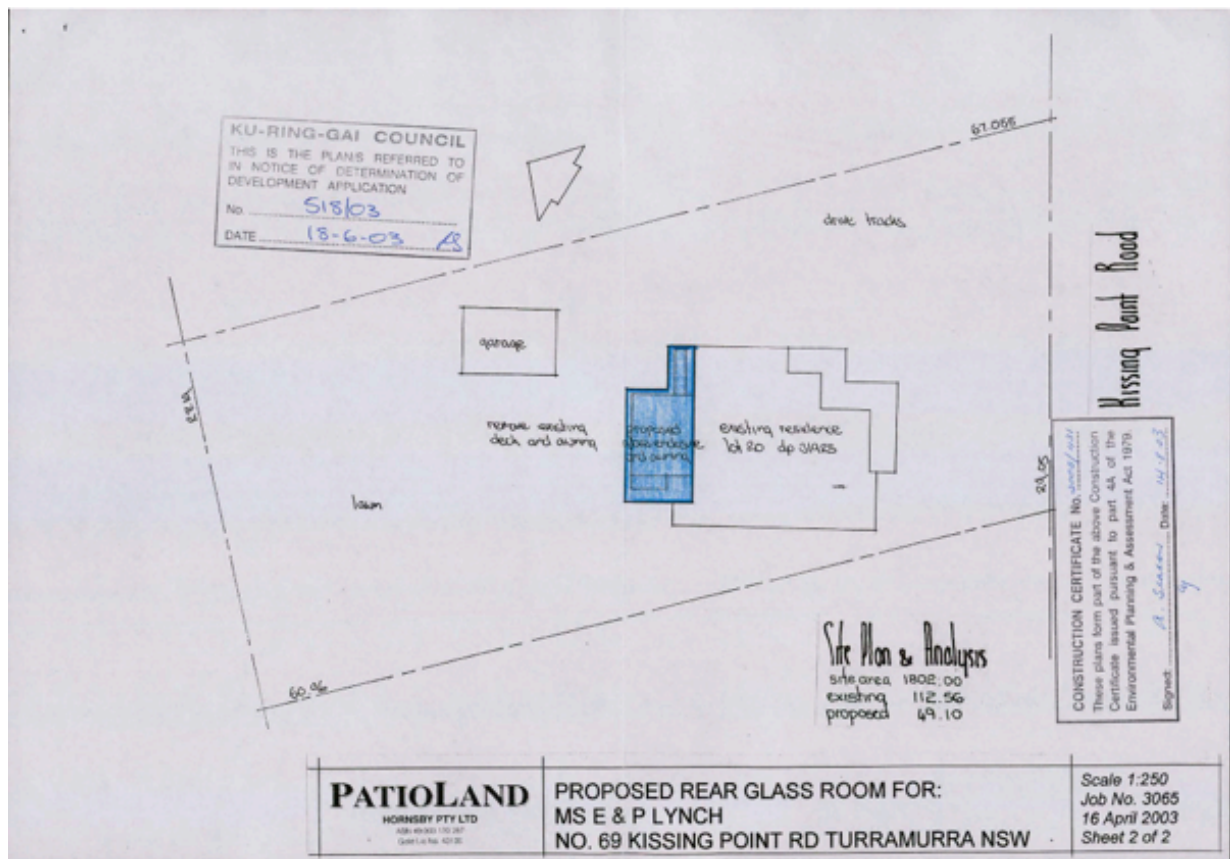
Original steps to veranda just left of centre



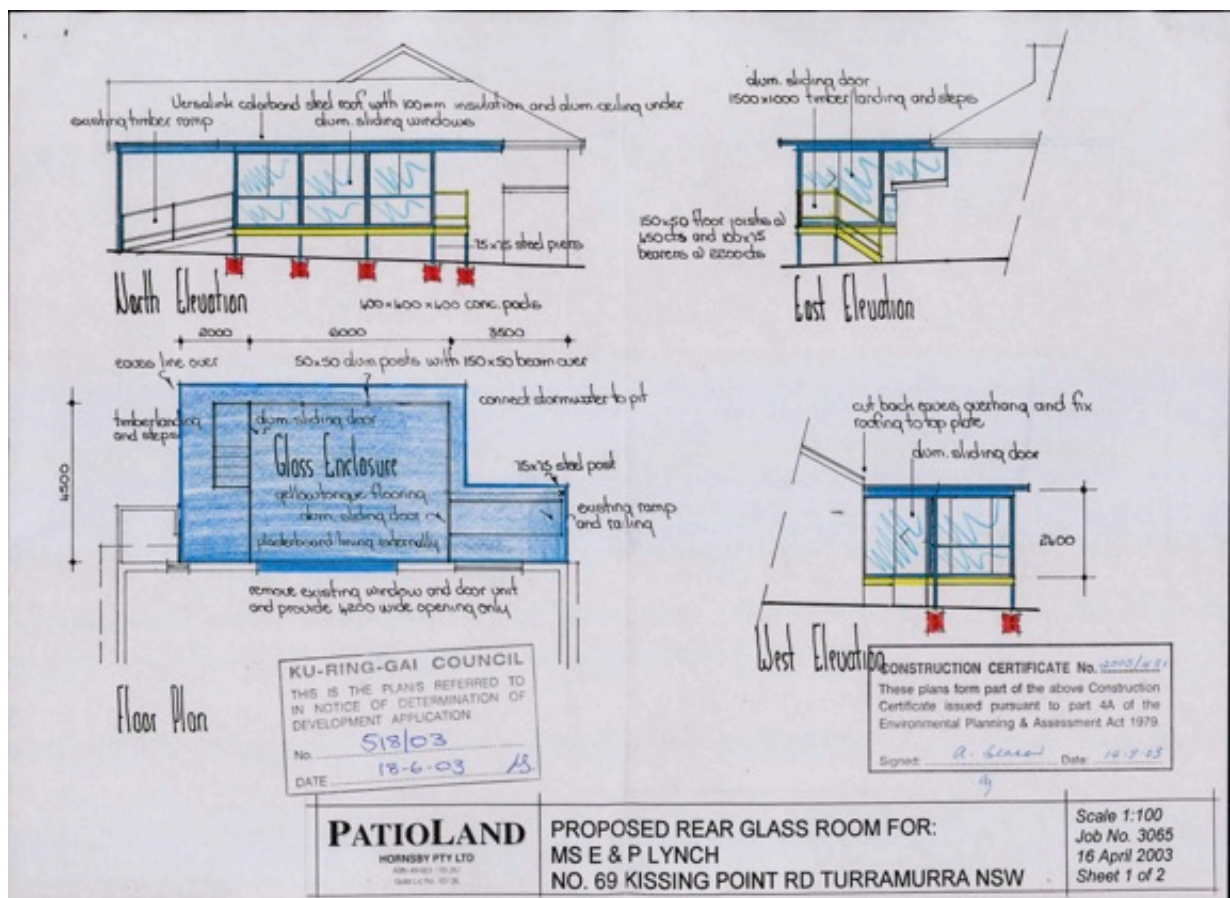
All downpipes discharge on to the ground. No evidence of stormwater drains was found.



Weatherboards with battened fibro above on shed, left, and part of wall of former inset veranda, above



17



DRAWINGS FOR ADDITION OF GARDEN ROOM, 2003

3.4 Style

The definitive framework for identifying architectural styles in Australia is that of Apperly, Irving and Reynolds.³ They are mainly concerned with “high” or “contrived” architectural styles rather than “popular” styles, or the vernacular. Ian and Maisy Stapleton focus on house styles. All these authors provide a perceptive account of what a style is, how styles evolve, and how styles relate to society and culture.

These authors and others such as Raworth, Boyd and even some various local councils offer different systems of classification. Apperly, Irving and Reynolds offer the most rigorous framework and that will be mainly used here.

It would be difficult, I suggest, for an informed observer to estimate, at first glance, whether the house is pre- or post- World War 1: a question that arises because there was a reduction in house-building during that time. Simply in terms of the style indicators the authors list, the house has some of the characteristics of the Federation Arts and Crafts style, commonly dated as 1900-1915, and some of the Inter-War Californian bungalow, roughly 1915-1940. There is a hint of Inter-war Old English in the moderately steep roof pitch and battened, if not half-timbered, gables. The knowledge that it was designed during the war answers that particular question.

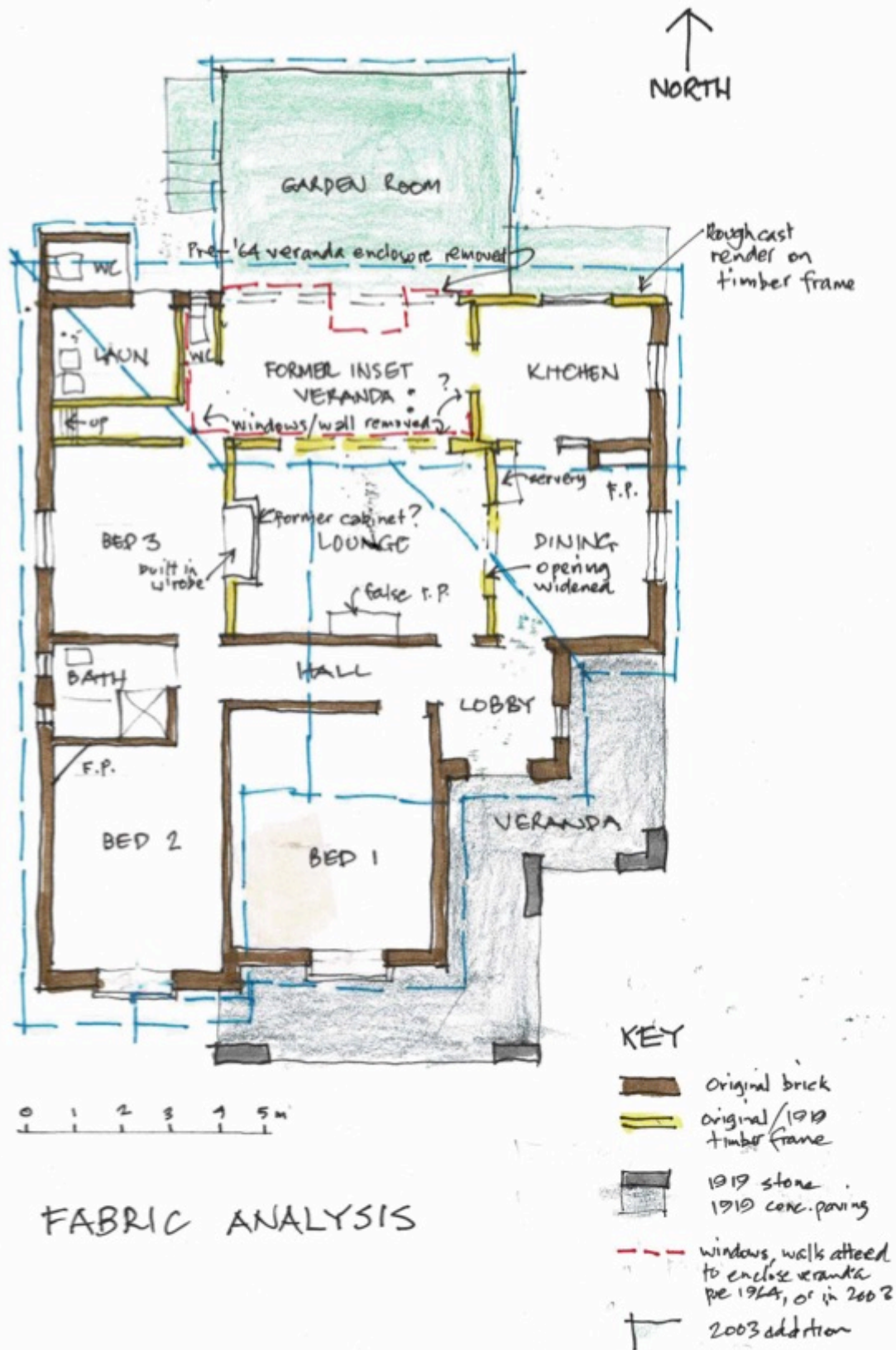
The term “transitional” is sometimes used to describe buildings with the characteristics of more than one style classification. That is not a pejorative term.⁴ Indeed it can be argued that just as the term “Edwardian” is sometimes used for the later flowering of the Federation Queen Anne style, houses of the time and characteristics of the subject one could be given their own style classification.⁵ After all, despite a reduction in building, a number of such houses were built in Ku-ring-gai during the war.

The house is best described as an individually designed small house with the blend of Federation Arts and Crafts and inter-war Californian bungalow characteristics typical of the relatively few houses designed during the First World War.

³ Apperly, Richard, Robert Irving and Peter Reynolds, *A Pictorial Guide to Identifying Australian Architecture*, Angus and Robertson, Sydney, 1994

⁴ The Heritage Conservation Policy of the former Concord Council, later adopted by Canada Bay Council, discusses the prevalence of “hybrid” styles.

⁵ Similarly, Brian McDonald identified the common characteristics of late 1930s brick bungalows in Parramatta, a type subsequently studied by Hall in a review of potential items for Parramatta City Council in 2005.



3.5 Condition

The house is in poor condition. A minor issue is that the paint on the windows, which are original, is bare and powdery. The major problem is that the house suffers from some serious cracking in the brick walls, some floors are out of level, and there is minor rising damp. However there is no suggestion that it presents a danger. The timber-framed walls are not generally subject to cracking.

The owner's engineer (ACOR) attributes the cracking to the presence of roots extending from a very large liquidambar tree on the adjacent property. One large root extends under the front wall of Bedroom 2. Photographs in the ACOR report show several large roots on the surface below the floor.

Council's consultant engineer attributes the cracking to stormwater from the downpipes, all of which discharge directly to the ground, and appear to have done so for a century. The erratic flow of water causes the clay substrate to swell and subside.

Even if the tree were not present, the flow from the downpipes still would induce an unacceptable degree of cracking. With the tree being adjacent, the flow appears to have attracted the roots. In my opinion, both factors have contributed.

The movement of the walls and engaged piers, and possibly in some isolated piers, has caused the floors to move in turn, while fractures in the damp-proof course have resulted in some rising damp.

In terms of future physical management of the issue, the relative contribution of the two factors seems no longer to be relevant. The tree now appears to be dead or dying, and will presumably have to be removed. (An arborist or Council Tree Officer should advise on this matter). Hence, if the house is to be retained, the issue appears to be not whether to remove the tree or to retain and stabilise it while preventing further damage from growing roots. The question is how to deal with the dying roots under the building. This is discussed in 8.1.

3.6 Early houses in the vicinity

Most of the early houses in the area have been replaced or altered beyond all recognition. A small number remain readily recognisable, and some of these appear, from the street, to be reasonably intact. They include "Ingalara", a listed mansion at 62 Kissing Point Road, and a number of small to medium sized house whose photographs are below.

The nearest of these are No. 51, "Bapaume," (listed as item 775) and No. 53, "Rudyard," (item 776). These and No. 49 were built during the First World War and were originally similar or identical, and were relatively small. No.51 retains most of its Federation Arts and Crafts/inter-war Californian bungalow characteristics. No. 53 is considerably altered. The draft inventory form for Nos. 51 and 53 states that No. 49 was demolished, but it remains, unrecognisable, the original structure having been encapsulated in large extensions. Notes on the other nearby houses are in the captions.



51 Kissing Point Road, "Bapaume," was probably named after the town in northern France where a battle took place towards the end of the First World War.



"Rudyard," 53 Kissing Point Road, probably named after Kipling, is only recognisable on close inspection and by reference to No. 51.



39 Kissing Point Road, also on the north side. Late Victorian/early Federation, symmetrical. Appears intact; not listed.



46 Kissing Point Road.
Symmetrical, arguably
Inter-War Georgian Revival,
possibly late 1920s – 1930s.
Appears intact from the
street. Not listed.



48 Kissing Point Road. An
Inter-war Californian
bungalow. Extended on left.
Not listed.



54 Kissing Point Road.
Listed as “Kurrawah”, but
its name plate reads
“Karuah.”

4 HERITAGE CONCEPTS

4.1 Values

Heritage may be defined as *valuable things from the past*. Heritage can be seen broadly as including many aspects of culture – such as art, music, dance, language, literature, philosophy, religion, political institutions – as well as aspects of the physical environment, with which this report is concerned. The physical environment in turn comprises the *natural landscape* – untouched by man – and the *cultural landscape* – any place that has been modified by human activity.

Buildings are the most obvious examples of places in the cultural landscape, but streetscapes, engineering structures, movable items and rural landscapes are other examples. (In practice, the cultural and natural landscapes are not always easily distinguished, at least until a place has been studied in some depth.)

If our environmental heritage comprises *valuable* places or items that remain from the past, it follows that they should be conserved, so that present and future generations may understand and enjoy them. But we all have different *values*. If we did not, there would be no need for heritage controls.

4.2 The Burra Charter

Although values are individual and subjective, there is a rigorous method or framework for considering them: the *Burra Charter*.⁶ This has been developed by Australia ICOMOS (International Council on Monuments and Sites, linked to UNESCO). The key concept is an item's *significance*. What does this item *signify*, what *sign* does it make, what *signal* does it send to us about our past - about why our culture and physical environment are as they are?

The *Burra Charter* gives five bases of significance. An item may be significant in one or more of these ways.⁷

Historical significance arises when an item is important in the course of an area's history or has strong associations with a historical figure or event.

An item can have aesthetic significance if it has visual appeal or demonstrates a particular architectural style.

Scientific value is present if the item yields, or has the potential to yield, technical information useful in research, for example about history, anthropology, construction techniques, or the natural world.

Social significance means that people hold a place in particular esteem: it is a focus of community sentiment, and there would be a sense of loss if it were no longer there.

⁶ Australia ICOMOS, *The Burra Charter (The Australia ICOMOS charter for places of cultural significance)*, 2013.

⁷ Author's wording. The *Burra Charter* itself does not define these terms, but they are explored in Australia ICOMOS, *Practice Note: Understanding and assessing cultural significance*, Nov.2013

Spiritual significance was introduced as a distinct category in the 1999 revision of the Burra Charter. It relates to places that have meaning at a spiritual level.

The above terms define the *nature* of an item's significance. Another dimension, not actually defined in the Burra Charter or related Practice Notes, is the *degree* of significance. On this dimension, an item may be significant because it is rare or representative, or sometimes both.

Rarity means signifying a rare, endangered or unusual aspect of history or the environment. Representativeness means being a fine example of an important class of items.

A third dimension is the *level* of significance. It should be noted that the level is not a hierarchy of importance, but is concerned with the geographical spread of the people to whom an item is significant, e.g. local, state.

Expert studies over the years have relied on this three-dimensional matrix, or variations of it, and it is particularly appropriate for complex items and heterogeneous sets of items.

4.3 The NSW Heritage Assessment Procedure

The *Heritage Act 1977* defines *heritage significance* as the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item. These values are clearly derived from the Burra Charter. The NSW Heritage Council has used its powers under the Act to gazette the following seven *criteria*. An item that satisfies at least one of the criteria is *significant*. It is then assessed to determine whether it is significant at local or at the State level.

Historical significance SHR criteria (a)	An item is important in the course, or pattern, of NSW's or the area's cultural or natural history
Historical association significance SHR criteria (b)	An item has strong or special association with the life or works of a person, or group of persons, of importance in NSW's or the area's cultural or natural history.
Aesthetic significance SHR criteria (c)	An item is important in demonstrating aesthetic characteristics &/or a high degree of creative or technical achievement in NSW or the area
Social significance SHR criteria (d)	An item has strong or special association with a particular community or cultural group in NSW or the area for social, cultural or spiritual reasons.
Technical/Research significance SHR criteria (e)	An item has potential to yield information that will contribute to an understanding of NSW's or the area's cultural or natural history.
Rarity SHR criteria (f)	An item possesses uncommon, rare or endangered aspects of NSW's or the area's cultural or natural history.
Representativeness SHR criteria (g)	An item is important in demonstrating the principal characteristics of a class of NSW's or the area's cultural or natural places or cultural or natural environments.

This framework is the basis of the *NSW heritage assessment procedure*⁸, in which rigorous, though necessarily subjective, *guidelines* for inclusion or exclusion under each criterion are set down.

⁸ NSW Heritage Office, NSW Heritage Manual, *Assessing Heritage Significance*, 2001, p. 6.

4.4 The 1996 version of the NSW Heritage Assessment Procedure

The 1996 version of the NSW Heritage Assessment Procedure did not distinguish between historical and historical association significance. However it did distinguish more explicitly between the *nature* and the *degree* of significance an item might have. An item was required to satisfy at least one criterion for nature of significance, *and* at least one of the degree criteria. The procedure provided for three *levels* of significance (State, regional or local). The relevant level was entered into the table for each criterion against which significance was established.

Findings could be summarised using a framework such as the hypothetical example below:

NATURE of SIGNIFICANCE	DEGREE of SIGNIFICANCE	
	Rare	Representative
Historical	<i>Local level</i>	<i>State level</i>
Aesthetic	----	<i>Local level</i>
Technical/research	---	---
Social	---	<i>Local level</i>

The 1996 framework is arguably more rigorous than the 2001 version in the way it deals with the degree of significance. The current version was written, *inter alia*, “to maintain consistency with the criteria of other Australian heritage agencies.” The guidelines⁹ do explain that *rarity* (criterion (f)) and *representativeness* (criterion (g)) can only be determined by means of comparisons with other items.

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4.4 Gradings of significance

The publication *Assessing Heritage Significance* states on p. 11, *Different components of a place may make a different relative contribution to its heritage value. Loss of integrity or condition may diminish significance. In some cases it may be useful to specify the relative contribution of an item or its components. While it is useful to refer to the following table when assessing this aspect of significance it may need to be modified to suit its application to each specific item.* The emphasis is on alterations and originality – i.e. intactness.

Grading	Justification	Status
EXCEPTIONAL	Rare or outstanding element directly contributing to an item's significance.	Fulfil criteria for local or State listing.
HIGH	High degree of original fabric. Demonstrates a key element of the item's significance. Alterations do not detract from significance.	Fulfil criteria for local or State listing.
MODERATE	Altered or modified elements. Elements with little heritage value, but which contribute to the overall significance of the item.	Fulfil criteria for local or State listing.
LITTLE	Alterations detract from significance. Difficult to interpret.	Does not fulfil criteria for local or State listing.
INTRUSIVE	Damaging to the item's heritage significance	Does not fulfil criteria for local or State listing.

⁹ Ibid., p.8, reproduced in Appendix B.

5 HERITAGE ASSESSMENT

A close reading of all the guidelines shows that integrity / intactness or the lack of them is a common theme. Just as the 2001 criteria are a combination of the 1996 nature and degree criteria, the 2001 guidelines, reproduced below, are an amalgam of the 1996 criteria in Appendix B.

The 2001 document includes the following caveat:

The inclusion and exclusion guidelines are a checklist only – they do not cancel each other out. The exclusion guidelines should not be applied in isolation from the inclusion guidelines, but should be used to help in reviewing and qualifying the conclusions reached.

5.1 Historical significance

Under the NSW Heritage Assessment Criteria, an item has historical significance if it is *important in the course, or pattern, of the area's cultural or natural history*. The Heritage Manual provides the following guidelines for inclusion or exclusion on the basis of historical significance:

Guidelines for INCLUSION

<i>Shows evidence of a significant human activity</i>	Y
<i>Is associated with a significant activity or historical phase</i>	Y
<i>Maintains or shows the continuity of a historical process or activity</i>	Y

Guidelines for EXCLUSION

<i>Has incidental or unsubstantiated connections with historically important activities or processes</i>	N
<i>Provides evidence of activities or processes that are of dubious historical importance</i>	N
<i>Has been so altered that it can no longer provide evidence of a particular association.</i>	N

Comment:

The relevant national theme identified by the Australian Heritage Commission is *xi: Building settlements, towns and cities*. The relevant NSW historical theme is *Accommodation (bungalow)*

The house clearly has historical significance in Turramurra and the Ku-ring-gai LGA. It was one of the earliest small bungalows built on the north side of Kissing Point Road and has survived largely intact. It shows evidence of, and is associated with a significant human activity in the area: its conversion from an orchard to a residential suburb including relatively modest houses beginning in the late Federation period, during the First World War.

5.2 Historical association significance

There is no evidence of any association between the building and anyone of importance in the history of the area or the State.

5.3 Aesthetic significance

Under the NSW Heritage Assessment Criteria, an item has aesthetic significance if it is *important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW or the area*.

The Heritage Manual provides the following guidelines for inclusion or exclusion on the basis of aesthetic significance:

Guidelines for INCLUSION

<i>Shows or is associated with creative or technical innovation or achievement</i>	N
<i>Is the inspiration for a creative or technical innovation or achievement</i>	N
<i>Is aesthetically distinctive</i>	Y
<i>Has landmark qualities</i>	?
<i>Exemplifies a particular taste, style or technology</i>	Y

Guidelines for EXCLUSION

<i>Is not a major work by an important designer or artist</i>	Y
<i>Has lost its design or technical integrity</i>	N
<i>Its positive or sensory appeal or landmark and scenic qualities have been more than temporarily degraded</i>	N
<i>Has only a loose association with a creative or technical achievement</i>	N/A

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Comment:

An individually designed small house with the blend of Federation Arts and Crafts and inter-war Californian bungalow characteristics typical of the reduced number of houses designed and built during the First World War. When viewed from the street and any direction other than the rear, it presents as an integrated composition, with pleasing proportions, well balanced massing, and a consistent hierarchy of materials. The interior detailing is simple, but consistent with the Arts and Crafts philosophy and style and modest scale of the house, as is the ordinary standard of workmanship.

The interior detailing and planning do have some odd characteristics. These can be largely explained by the house's construction in two stages before 1919, and the enclosure of the inset rear veranda probably before WW2. Other oddities and anomalies in the original spaces, planning, and detailing and workmanship suggest the hand of an amateur, very likely the coachbuilder owner. These include the false (or uncompleted) fireplace and the possibly altered built-in cupboard in the adjoining bedroom.

The oddities do not make the house significant, but they are not so great in this small house as to cancel its significance. They are evidence of the individuality that emerged in design and in society in the Federation period, which contrasts with the conformity of the Victorian era.

On balance, the house is considered aesthetically significant.

5.4 Social significance

There is no evidence that the building is important to the community for social, cultural or spiritual reasons. (The Perumal Murphy Alessi study of 2006 attributed social significance to all the items identified as significant, on the basis that the Kuring-gai community values such items, but it is usually attributed only to individual items of particular social value.)

5.5 Technical/Research significance

There is no evidence or reason to believe that the building has potential to yield information that will contribute to an understanding of the area's cultural or natural history.

5.6 Rarity and representativeness

Under the NSW Heritage Assessment Criteria, an item is rare if it possesses uncommon, rare or endangered aspects of NSW's or the area's cultural or natural history. The Heritage Manual provides the following guidelines for inclusion or exclusion on the basis of rarity:

Guidelines for INCLUSION

<i>Provides evidence of a defunct custom, way of life or process</i>	N
<i>Demonstrates a process, custom or other human activity in danger of being lost</i>	N
<i>Shows unusually accurate evidence of a significant human activity</i>	Y
<i>Is the only example of its type</i>	N
<i>Demonstrates designs or techniques of exceptional interest</i>	N
<i>Shows rare evidence of a significant human activity important to a community</i>	Y

Guidelines for EXCLUSION

<i>Is not rare</i>	N
<i>Is numerous but under threat</i>	N

Under the criteria an item is representative if it is important in demonstrating the principal characteristics of a class of NSW's or the area's cultural or natural places or cultural or natural environments.

Guidelines for INCLUSION

<i>Is a fine example of its type</i>	N
<i>Has the principal characteristics of an important class or group of items</i>	Y
<i>Has attributes typical of a particular way of life, philosophy, custom, significant process, design, technique or activity</i>	Y
<i>Is a significant variation to a class of items</i>	Y
<i>Is part of a group which collectively illustrates a representative type</i>	Y
<i>Is outstanding because of its setting, condition or size</i>	N

Guidelines for EXCLUSION

<i>Is a poor example of its type</i>	<i>N</i>
<i>Does not include or has lost the range of characteristics of a type</i>	<i>N</i>
<i>Does not represent well the characteristics that make up a significant variation of a type</i>	<i>N/A</i>

Comment:

The concepts of rarity and representativeness are only meaningful in relation to the criteria concerned with the nature of significance (a) to (e) and needs to be considered in relation to each applicable one in turn. In the present case, it has been established above that the house is

- historically significant as one of the earliest small houses built on the northern side of Kissing Point Road as part of the development of the former orchard;
- aesthetically significant as an individually designed small house with a blend of Federation Arts and Crafts and inter-war Californian bungalow characteristics.

It is historically rare in the immediate area as the table in 2.2 demonstrates, and is possibly rare in Turrumurra. But it is considered to be representative within the Ku-ring-gai LGA, where similar evidence of the initial wave of suburban development of the original large grants exists.¹⁰

Turning to the question of whether it is rare and/or representative aesthetically, the style of the house is a prime consideration. The numbers and casual observations referred to above again provide some guidance regarding the extent of this style, and it is evident that the smaller, earlier houses have Federation Arts and Crafts and/or inter-war Californian bungalow characteristics.

Unlike the almost standard Italianate houses of the preceding Victorian era and the late 1920s speculative Californian bungalows found elsewhere, most houses of the period in Ku-ring-gai are individually designed (except some small groups where a specific design is repeated). But even amongst this variety the subject house is unusual, with its slightly steeper roof and proliferation of gables. No similar house has been identified in Ku-ring-gai in the course of this exercise, though there may well be several.

If the variety of individual designs were to make every aesthetically significant item rare, then the house is rare. If the variety of forms is regarded as typical of the type, it is representative. Having regard to the pattern of answers to the questions posed in the guidelines, on balance it is aesthetically representative in the Ku-ring-gai LGA.

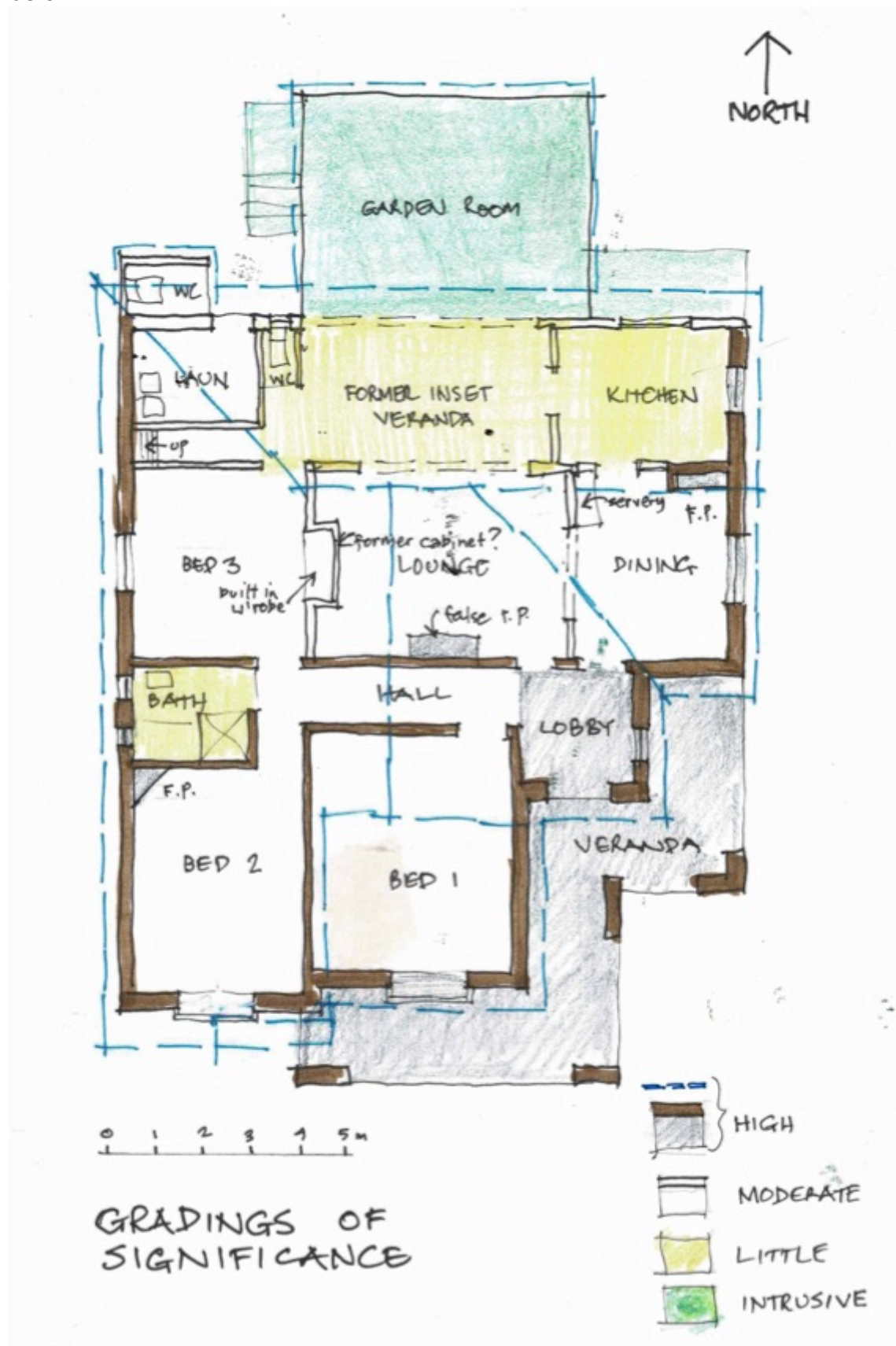
5.7 Level of significance

It has been established above that the house is significant at the local level. There is no suggestion or reason to believe that it may be significant at State level, and no comparative analysis or other additional investigation into its level is warranted.

¹⁰ On the basis of the sample in the Davies report alone, a good number of comparably sized pre-1920 houses survive largely intact across Ku-ring-gai, together with larger houses and houses built in the 1920s and 1930s. Casual observation suggests that there may also be considerable numbers of this type, unlisted and outside conservation areas north of Gordon.

5.8 Gradings of significance of components of the house

There is in this case a correlation between the intactness of the main components and their importance as elements in the design, resulting in the gradings illustrated below.



5.9 Statement of Significance

The house has representative historical significance at the local level in Ku-ring-gai. It was one of the earliest small bungalows built on the north side of Kissing Point Road following the subdivision of the orchard which had been established on Boyd's grant.

It is also considered to have representative aesthetic significance at the local level as an individually designed small house with the blend of Federation Arts and Crafts and inter-war Californian bungalow characteristics typical of the reduced number of houses designed and built during the First World War.

5.10 Recommendation

The house should be listed in Part 1, Schedule 5 of the Ku-ring-gai Local Environmental Plan 2015. The interiors, garden and outbuildings should not be specifically included in the Schedule.

5.11 Inventory form

A State Heritage Inventory Form is at Appendix A.

6 THE PLACE OF COMPARATIVE ANALYSIS IN HERITAGE ASSESSMENT

6.1 Requirements of the brief

The brief includes these requirements:

Critically analyse the Paul Davies heritage assessment report including its heritage assessment, comparative analysis, conclusions and recommendations.

The review of the Paul Davies comparative analysis must discuss properties located within the northern sections of the Ku-ring-gai local government area, as well as properties in the southern sections of the local government area.

This necessitates the following detailed review of the theoretical basis for comparisons in heritage assessments, following on from the concepts outlined in 4 above and of the practicalities of the process as laid down by ICOMOS and the NSW Heritage Office.

6.2 ICOMOS guidance on assessing significance and use of comparisons

The Burra Charter sets out the basic logical and disciplined approach: investigate, assess and manage significance. It identifies, but does not define, its five values: in Article 1.2: *Cultural significance* means aesthetic, historic, scientific, social or spiritual value for past, present or future generations.

The values are defined in the ICOMOS *Practice Note: Understanding and assessing cultural significance*, which describes the assessment process in more detail. While the Note mentions the existence of criteria other than these five, neither it nor the Burra Charter uses the terms *degree criteria*, *rarity* or *representativeness* at all,¹¹ and the Charter makes no mention of *comparative analysis* or *comparative evaluation*.

The Note describes assessment process thus:

The cultural significance of a place is assessed by analysing evidence gathered through the physical investigation of the place, research and consultation. The next step is to evaluate its qualities against a set of criteria that are established for this purpose. The criteria used may be as simple as the five values identified in the Burra Charter, or they may be more complex. Australian heritage agencies generally use eight criteria. A place may be of cultural significance if it satisfies one or more of these criteria. Satisfying more criteria does not mean a place is necessarily more significant.

To help achieve consistency, some heritage agencies use a set of significance indicators to assist in applying each criterion... [gives a Queensland example]..... In addition, threshold indicators may be used to determine the relative significance of a place. Often these rely on comparison of a place with other similar examples within a defined area - across a State for example, a locality or nationally.

¹¹ Except that rarity is mentioned as an aside to an explanation of scientific value, p.5, and a discussion on the importance of condition, p.7.

Threshold indicators are most commonly used to determine if a place can be included on a particular heritage list or register.

The sentence underlined is the only reference in the ICOMOS documents to comparisons of potential items. The term used is *comparison*, not comparative *evaluation* or *analysis*. The Note is very general, and is clearly descriptive, not prescriptive. As will be shown below, the process laid down for NSW does not rely on comparisons to directly *determine if a place can be included on a particular heritage list or register*. Its purpose is simply to determine the significance of an item or potential item.

6.3 The NSW Heritage Assessment Procedure and the use of comparisons

6.3.1 The 1996 and 2001 versions of the procedure

The NSW Heritage Assessment Procedure¹² specifies the process in more detail, step by step. As explained in 4.4, the 1996 version¹³ of the process distinguished more explicitly between the *nature* and the *degree* of significance an item might have. The steps to be followed were very similar to those in the 2001 version, as shown in the table below.

Step	1996	Step	2001
1	Summarise what is known	1	Summarise what is known
		2	Describe uses, associations, meanings
2	<ul style="list-style-type: none"> Assess against criteria for <i>nature</i>; then only if satisfied, Assess against criteria for <i>degree</i> 	3	Assess against criteria (a)-(g) (i.e. nature and degree of significance)
3	Check	4	Check
4	Assess <i>level of significance</i>	5	Assess <i>level of significance</i>
5	Write Statement of Significance	6	Write Statement of Significance
6	Liaise with community	7	Get feedback
7	Complete SHI database form	8	Nominate for listing

For purposes of the current discussion, the relevant steps are concerned with assessing the nature, degree and level of significance (1996: steps 2 and 4; 2001: steps 3 and 5).

6.3.2 The guidelines

To assist in assessing the nature and degree of significance, each document includes *guidelines* for inclusion and exclusion of a potential item under each criterion. There are also some examples and cautions against too rigid an application. These guidelines are what the Practice Note calls *threshold indicators*. Those for historical and aesthetic significance are quoted in 5.1 and 5.3 above.

¹² NSW Heritage Office, NSW Heritage Manual, *Assessing Heritage Significance*, 2001, p. 6.

¹³ NSW Heritage Office and Department of Urban Affairs and Planning, *Heritage Assessments*, 1996

6.3.3 Note on the primacy of historical significance

As the Procedure (p.5) and the Practice Note recognise,¹⁴ historical significance underpins the other values. While it is only necessary to satisfy one criterion, it is hard to imagine an item that was not historically significant being nevertheless aesthetically significant. On the other hand, an item may well have historical significance but lack aesthetic significance. It may never have had aesthetic value, or it may have been too much altered to retain it – but not so much that it lacks historical significance. A good example of the latter is “Rudyard,” 51 Kissing Point Road (see 3.6).

6.3.4 Intactness and integrity

When the item in question is a building, particularly when considering historical and aesthetic criteria, the key question is *integrity/intactness*. Under the guidelines, an item cannot have either historical or aesthetic significance *if it has been so altered that it can no longer provide evidence of a particular association*. The reason, of course, is that as the Burra Charter states, *Cultural significance is embodied in the place itself, its fabric, setting, use, associations, meanings, records, related places and related objects*. In the case of a building, the emphasis will be on the place itself and its fabric. Indeed the standard SHI form includes integrity/intactness along with the gazetted seven criteria, while the 1996 document includes intactness as one of three other criteria which can be used to qualify the nature of significance¹⁵.

6.3.5 Assessments against nature-and-degree criteria

Under the 1996 procedure, an item was explicitly required to satisfy at least one criterion for nature of significance, *and* only if did so, to satisfy at least one of the degree criteria.¹⁶ The guidelines for inclusion and exclusion under each nature-based criterion are set out together with guidelines for inclusion and exclusion under rarity and representativeness.

The 2001 procedure is less explicit. It requires only one of the seven criteria to be satisfied. Nevertheless the notes following the guidelines for inclusion and exclusion under *each* nature-based criterion state, *The attributes described for criteria (f) and (g) can assist in the determination of significance*.

Indeed the guidelines for rarity and representativeness have no real meaning except in the context of the criteria for the nature of significance. An item having heritage significance could not simply be rare, or representative; and an item that did satisfy at least one nature-related criterion would certainly be rare, representative or both.

There is no mention in the guidelines laid down in either version of the use of comparisons or comparative analysis or evaluation for assessing historical, historical association, aesthetic, social or technical/research significance. Whether an item meets any of them is independent of whether others in the area do, and are known to do.

¹⁴ ICOMOS Practice Note: Understanding and assessing cultural significance p.3.

¹⁵ Appendix B, p. 13. The others are [being] seminal or climactic [works].

¹⁶ Ibid.

Of course a knowledge of other examples, near or far, will certainly inform a judgement about the importance of an item, for example in demonstrating an aspect of history, or the strength of an associations, or an architectural style. But a formal process of ranking potential items is not called for.

6.3.6 *The use of comparisons in determining the degree of significance*

There is similarly no explicit mention, in either version of the procedure, of the use of comparisons or comparative analysis or evaluation to assess rarity or representativeness. However the terms can be loosely used to refer to this step.

The reason is that the questions posed in the guidelines do require judgements that involve quantitative and qualitative comparisons: e.g. the only example, shows rare evidence, a fine example, has the principal characteristics of a group. But the starting point is the already established historical, aesthetic etc. value of the item. The purpose is to establish the extent to which each of those values, in turn, is also present in other items in the area. These need to be like the subject one in some way (e.g. period, style, use, size).

One task for the assessor is to identify other possible items. This can be logistically difficult, depending on available information, geography, and the time and funds at hand. An existing inventory can be useful.

There is no definition of “class” or “type” (a term used in the guidelines.) Too narrow a definition would make every item rare; too broad a definition would include all as representative. There is no definition of “local area.” This could mean the precinct, suburb, rural shire, or metropolitan LGA (possibly a large, amalgamated one.) This situation is necessarily so; but the concept is a robust one. With a careful selection of the type of item and of the extent of the area, rarity and/or representativeness can be meaningfully expressed in the context of the area.

6.3.7 *The use of comparisons in assessing the level of significance*

Assessing an item’s level of significance is a subsequent, separate step which is only undertaken once the nature of its significance has been established and determined to be rare or representative against each criterion, at least in a local geographical context. The purpose of this step is to assess whether the item is important to the entire state.

The 1996 process provided for local, regional and state levels; the 2001 version only for local and state levels. The documents provide very little detail on the process for this step (though various separate documents are available to assist). The 2001 Procedure does state, in the notes under the guidelines for each criterion, *the level of heritage significance under each criterion at state or local level can only be determined by comparison with other like items.*

This is the only explicit mention of comparisons in the entire document. It is reinforced by the statement *In using these criteria it is important to assess the values first, then the context in which they are significant. Decide the appropriate context by considering similar items of local and state significance in each of these contexts*¹⁷. (This is worded somewhat obscurely, but *values* here refers to the criteria; *context* means the local and state geographic context.)

¹⁷ NSW Heritage Office, NSW Heritage Manual, *Assessing Heritage Significance*, 2001, p. 5

This would only need to be done if there were grounds to believe that an item might indeed be state-significant. (Most frequently, there are not, and the item is simply assessed as being locally significant against one or more of the criteria.)

6.3.8 Conclusions on the use of comparisons

1. A potential item must be sufficiently intact or otherwise retain sufficient integrity to satisfy at least one of the nature-of-significance criteria. Of these, historical significance underpins the others.
2. Nature-of-significance criteria are assessed against the guidelines without reliance on comparisons.
3. Assessment of rarity and/or representativeness does involve comparisons. The starting point is the already established historical, aesthetic etc. value of the item. The purpose is to establish the extent to which each of those values, in turn, is also present in other items in the area. The Heritage Manual does not term this step *comparison*, *comparative analysis* or *comparative evaluation*, but the terms are sometimes loosely used to describe it.
4. The Heritage Manual briefly refers to *comparisons* across the area and State as being necessary for establishing an item's level of significance against already established criteria, but many cases the likelihood of State significance does not arise and the item is assessed as locally significant.

6.4 Summary of the process and comparisons used in this report

The process was completed in accordance with the 2001 procedure, which is in practice the same as the 1996 version, as summarised below.

Step	2001 (as in previous table)	This report (5.1- 5.7)
1	Summarise what is known	Historical research and fabric analysis undertaken. It was established that the item is substantially intact.
2	Describe uses, associations, meanings	
3	Assess against criteria (a)-(g) (i.e. nature and degree of significance)	Assessed against criteria (a)-(e). Found to satisfy guidelines (a), (c) for historical and aesthetic significance. Then considered against guidelines (f), (g) for rarity, representativeness using a carefully considered definition of its type. In terms of distribution of the type, initial attention was paid to the immediate vicinity. Use was then made of relevant examples from the Davies report and casual observation. Found to be historically and aesthetically representative.
4	Check	
5	Assess <i>level</i> of significance	Self evidently significant at local but not state level. Comparative evaluation not required for this step.
6	Write Statement of Significance	Written.
7	Get feedback	Report to be submitted to Council with recommendation for listing.
8	Nominate for listing	

7 PEER REVIEW OF HERITAGE ASSESSMENT BY PAUL DAVIES

7.1 Framework of the Davies report

The order of presentation of material does not follow the sequence for the assessment process promulgated in the Burra Charter, the Practice Note and the Heritage Manual and used in this peer review (see 6.4). The introductory material (1.0) and History (2.0) are followed by 3.0, Physical description and Analysis. This includes the following::

The internal inspection has reinforced our assessment that the place is not of heritage significance at the level of a heritage item. The building fails on all criteria to achieve a satisfactory threshold, and even though it looks quite attractive from the street, this is actually not an attribute of significance. If aesthetic value is to be used as the sole reason for listing, the place would need to achieve a quite high level of value and well above other similar buildings, and it does not achieve this (as demonstrated in the comparative analysis in this report).

This foreshadowing of the report's conclusion is followed by 4.0, Comparative Analysis; 5.0, Assessment of Heritage Significance (against the criteria) and the Conclusion (6.0).

While the order of presentation does not necessarily reflect the reasoning underlying the conclusions, there are

- concerns with the validity of the process and hence the analysis, and
- professional differences of opinion on whether the house satisfies the guidelines and the criteria,

A central issue to both matters is the comparative evaluation which occupies much of the Davies report.

7.2 Key extracts from the comparative analysis

For convenience, large extracts of the analysis are reproduced below in italics. The underlining has been added for later reference. The report states at 4.1:

The basis of the comparative analysis is to compare the subject house, a freestanding single storey brick house in the Inter-war California Bungalow style in the Ku-ring-gai Council area, with other similar houses of similar architectural style from the Inter-war period within the Council area that are:

- *already locally heritage listed in an LEP or*
- *within a heritage conservation area listed in an LEP.*

This comparative analysis therefore determines the rarity or representativeness of this house, and how it compares to other similar houses which are already heritage listed or within heritage conservation areas.

Some 26 of the houses considered are individually listed in Schedule 5 of the LEP while 12 are in heritage conservation areas. They range from small to quite

substantial homes, some of which were architect-designed, built during the First World War or later, up to the late 1930s and best classified either as Californian bungalows or having both Federation Arts and Crafts and Californian bungalow characteristics.

The report continues:

The comparison is necessarily limited to these two groups of places as they are the only readily searchable schedules of places and are the only places that have been listed for heritage values. There may be other Inter-war residences that are not listed or within heritage areas that may compare but as they are not heritage listed and cannot easily be identified they are not considered.

The analysis concludes at 4.2,

The majority of comparable heritage listed houses in the Ku-ring-gai Council area (detailed in Attachment 1) were found to be:

- *substantial dwellings, that is larger and of individual design in contrast to more standard and representative dwellings*
- *known to be architect designed or attributed to a particular architect, and*
- *of a demonstrably higher quality than the residences that are contributory buildings within precincts.*

The subject house is a relatively modest dwelling that is not architect designed or attributed. It does have the triple gable front with verandah that is different to very modest residences from the period but the building is not of the same quality or design as the examples from this period that are heritage listed.

Details of these houses are then provided, and the report continues,

Comparative houses - modest Inter-war California Bungalows - are also represented in a number of heritage conservation areas With regard to the comparative houses the following observations are made:

- *The subject house at 69 Kissing Point Road has greater similarity to the comparative houses within HCAs than to the comparative houses in Attachment 1 which are locally heritage listed.*
- *Some of these comparative houses within HCAs are substantial dwellings which are also fine examples of their style (for example in Wolseley Road Lindfield), and yet were not individually listed as heritage items. This suggests that the threshold for listing of this type of dwelling is well-established.*

In undertaking the comparative analysis of the house at 69 Kissing Point Road and examining how it relates to comparable heritage items and contributory houses within HCAs, it is understood that:

- *A local (Ku-ring-gai) heritage listing hierarchy and threshold for heritage listing has been established by existing heritage item listings for similar houses; and*

- How the subject house compares to locally heritage listed and non-heritage listed comparative houses within HCAs places the subject house within the local heritage listing hierarchy.

This analysis has revealed that:

- *Comparative houses which are locally heritage listed are clearly of a higher level of heritage significance than the subject house, and*
- *If houses within Ku-ring-gai HCAs which are aesthetically of a higher level of significance than the subject house in Kissing Point Road have not been heritage listed, in the absence of the ability to satisfy the threshold for heritage listing in relation to other significance criteria (for example in relation to historical, historical association or social significance), then the house at 69 Kissing Point Road clearly does not reach the threshold for heritage listing in the Ku-ring-gai Local Government Area.*

7.3 Research and fabric analysis

The report is based on solid documentary research into the item. I found it relevant to examine the development of the local area after 1918 in more detail.

A prime purpose of examining the physical evidence is to determine the intactness or integrity of a potential item, as noted in 6.3.4 above. Intactness is particularly relevant to historical significance, which underpins the other values, and to aesthetic significance. The report does not include a prominent comment on the house's integrity/intactness, though it is acknowledged in the assessment of aesthetic significance against specific guidelines.

The house presents several anomalies, which the report identifies. I found it useful to obtain a copy of the DA drawings for the rear extension, and to prepare a fabric analysis plan (3.3) which identifies the extent of original timber-framed walls, differentiates the false and working fireplaces, locates the original rear veranda steps, indicates the possible extent of weatherboard cladding, suggests the likely phases of construction and alterations, and in my opinion resolves some – but not all – of the anomalies. (My analysis was assisted by photographs of the rear of the house provided by the original owner's family to the author of the NBRS report which were presumably not available to Paul Davies.)

7.4 Historical significance

The issue under this criterion is whether the house is important in the history of the area. The Davies report finds the house not to be historically significant.

7.4.1 Process issues

The Davies report provides considerable detail on the subdivision of the estate and the construction of the house. However there is no discussion of whether this information is important. The assessment at 5.2 simply lists each of the guidelines for inclusion and exclusion, together with the list of "Types of items which satisfy this criterion." Against each point is the remark "Not applicable."

There is no explanation for this assertion. The absence of discussion on this fundamental issue is unfortunate.

7.4.2 Matters of judgement

The house is largely intact and dates from the earliest period of the development of the former orchard as a residential suburb. As detailed in 5.1 above, and having regard to the guidelines, it is in my opinion clearly historically significant.

I therefore strongly disagree with the Davies report's finding. Regardless of possibly differing opinions about the other criteria, the house satisfies at least one criterion, and is therefore significant and should be listed.

7.5 Aesthetic significance

The issue under this criterion is whether the house is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the area. The Davies report finds the house not to be aesthetically significant.

7.5.1 Process issues

The Davies report states:

The building fails on all criteria to achieve a satisfactory threshold, and even though it looks quite attractive from the street, this is actually not an attribute of significance. If aesthetic value is to be used as the sole reason for listing, the place would need to achieve a quite high level of value and well above other similar buildings, and it does not achieve this (as demonstrated in the comparative analysis in this report

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This use of a comparative analysis to inform the assessment of aesthetic significance is simply invalid. The ICOMOS Burra Charter and Practice Note and the NSW Heritage Procedure do not suggest or even mention this approach for this purpose. The threshold for significance is set by the gazetted criteria and supporting guidelines, not by comparison with other items using a threshold based on local criteria. Table 4 in the report, comprising aspects on which the comparison is made, amounts to a set of criteria compiled on the basis of attributes identified in the particular selection of items for comparison. The threshold set by the criteria and guidelines in the NSW Heritage Procedure is not a lower standard, but a different one.

A separate but related issue is that the Davies report explicitly equates significance to whether a particular local authority has seen fit to list, or declined to list, any particular set of items. (The question of whether present or past listing practice in Ku-ring-gai is appropriate is explored in 9.2.)

As noted in 6.3.3, historical significance underpins the other values, so is hard to imagine an item that was not historically significant being nevertheless aesthetically significant. It is in my view inconceivable that an extraordinary aesthetic value could exist in a place lacking historical significance. Even if it could, significance must be evaluated against each criterion in turn. Failure to satisfy one criterion cannot raise the threshold for another criterion.

7.5.2 *Matters of judgement*

Whether an item satisfies any of the criteria is of course a matter for professional judgement on which views will sometimes differ. The complete assessment undertaken for this review is in 5.1 to 5.7. The differences with the Davies report are discussed below.

The report does acknowledge the house's relative intactness and stylistic characteristics. It astutely observes deficiencies in layout, detail and workmanship. The report finds a degree of pretension in the concentration of features on the exterior at the front. It observes that the house *looks quite attractive from the street*, while noting, *this is actually not an attribute of significance*.

I agree that the house is attractive from the street. The view from the street is not a criterion, but is a consideration when assessing aesthetic significance, as the guidelines make clear. If the house does not have "landmark qualities," it certainly is "aesthetically distinctive" and "its positive visual or sensory appeal or landmark and scenic qualities" have not "been more than temporarily degraded." In my opinion the view from the street is attractive because the composition is well resolved.

The report states, "the interior inspection reinforces the idea that this is a house cobbled together from a range of sources without any great understanding of design form for function." (p. 21). The style, of course, is characterised by the use of materials which contract in colour and texture, and of forms chosen not on the basis of function, but for a picturesque effect. In my opinion, the design is successful, despite infelicities in planning.

The report states, "There has been an obvious attempt to aggrandise what is a modest house by the front external form and a few internal elements." This is in my opinion an overstatement. It was almost universally the case that the principal view and principal rooms of a house received the most attention, until perhaps recent times when there is an emphasis on entertaining areas at the rear.

The detailing, said to be simple, is indeed so: that is characteristic of the style. The rectangular joinery sections are entirely typical. The workmanship is generally of a typical standards, slightly rustic in the Arts and Crafts tradition, and perhaps evidence of the original owner's involvement.

The Davies report observes that the oddities do not make the house significant. I agree, but neither do they rule out any significance, being mainly minor, internal and in some cases the result of reversible changes.

While the use of and conclusions drawn from the comparative analysis are invalid, the views in the Davies report which are based on direct observation above are reasonably held. Nevertheless in my opinion, on balance the house satisfies the guidelines and is aesthetically significant.

7.6 Historical association, social and technical/research significance

I concur with the report's findings that the house is not significant in these ways.

7.7 Rarity and representativeness

The report finds the house to be neither rare nor representative. The discussion is concerned entirely with aesthetics, and relies very largely on the comparative analysis.

7.7.1 *Process issues*

The degree criteria, rarity and representativeness, should be assessed in terms of those nature-of-significance criteria on which the item has been found to be significant, and with regard to the Heritage Office guidelines. But the findings in the report are not expressly related to its findings on historical and aesthetic significance. This is perhaps understandable as the report states earlier that the house does not satisfy the historical or aesthetic nature-of-significance criteria. In such a case, the rarity and representativeness issue should logically not have arisen, but in this instance they were assessed as if they were independent issues.

The comparative analysis was used to assess rarity and representativeness (as well as aesthetic value) and for this purpose the technique is appropriate, as discussed in 6.3.6.

It was entirely appropriate to use the LEP listings as a prime source for identifying similar items. However the selection was not of similar items. It included a good proportion of houses which are more recent, larger, and in many cases clearly Californian bungalows, or 1930s bungalows, with few Federation Arts and Crafts characteristics. They were found to be unlike the subject house in those respects. This somewhat circular argument may be informative with regard to the typical characteristics of listed items, but is largely wasted in terms of ascertaining the distribution of realistically comparable items.

The Davies report did identify a small number of items with similar characteristics, sufficient for the present report to conclude that the item is not rare but representative.

It also identified, but did not include in the comparative analysis, two listed items at 51 and 53 Kissing Point Road. They were, like the subject No. 69, built during the First World War on subdivisions of Boyd's Orchard Estate, and are quite small. No.51 retains most of its Federation Arts and Crafts and inter-war Californian bungalow characteristics while No. 53 is considerably altered. It would have been useful to include them in the comparative analysis.

7.7.2 *Matters of judgement*

The 2001 guidelines for assessing rarity and representativeness are an amalgam of the separate guidelines against the historical, aesthetic and other nature of significance criteria used in 1996. The wording does not include "historical" or "aesthetic," but the questions raised can only be answered in those terms.

The Davies report simply asserts that the house has no historical significance. This view is reflected in its responses to the guidelines, with which I disagree. The responses are based entirely on the assessment that the house lacks aesthetic significance, with which I also disagree for the reasons given in 0.

Curiously the Davies report in the conclusion (6.0) states. "We would recommend that the owner retain the building... as despite not being of heritage item status, [it] remains a good representative building of the first wave of subdivision for the locality."

7.8 Summary of the overall process used for the Davies report:

The process used differs from that advocated in the NSW Heritage Procedure.

1. The process does not commence with an assessment of the house against the nature-of-significance criteria.
2. It does not give due consideration to the question of historical significance.
3. It entertains the (theoretical) possibility of its having aesthetic significance in its absence.
4. It proceeds to assess the house's aesthetic significance by means of a comparative analysis, comparing its aesthetic value to that of listed and contributory inter-war Californian bungalows in the LGA but outside Turramurra.
5. In doing so it recognises a threshold operating in Ku-ring-gai, whereby the fact of heritage listing is the standard for aesthetic significance.
6. It concludes that the house is aesthetically inferior to those examined, and that in the absence of significance against other criteria, does not reach this threshold, and is therefore is not worthy of listing.
7. The comparison with a series of inter-war Californian bungalows finds the house neither representative nor rare, and this informs the assessment that is made using the guidelines.

7.9 Critique of the overall process

A comparison of this sequence with that summarised in 6.4 above raises a mix of process and judgement issues which are discussed in order below

1. The item should be first assessed against the nature-of-significance criteria, commencing with historical significance which underpins the other criteria.
2. The house does have historical significance.
3. If the assessor thought it did not, the exercise could have concluded at that point. But as the current procedure does theoretically contemplate significance on any one or more of the criteria, it could be considered valid to pursue the question.
4. A comparative analysis can be used to assess rarity and representativeness once the item has been found to meet at least one (which would need to be historical) criteria. A comparative analysis should be used to assess the level of significance, if the possibility of State significance exists, but that is not the case here. It is not valid to use comparative analysis to assess or grade significance. The threshold for significance is set by the guidelines, not by whether a particular local authority has seen fit to list, or declined to list, any particular set of items.
5. It would be unfortunate for the future of Ku-ring-gai's significant items if the author's understanding were correct. The brief for this report certainly does not suggest that it is. Nor does the listing of 53 Kissing Point Road, or even of the intact but simple No. 51. But such an understanding would certainly explain the exhaustive approach that has been taken.

6. The house may indeed be inferior, as architecture, to those with which it has been compared. However, it may not. Although listed or in HCAs, some of them might well, on close examination, be found to have awkward massing, awkward layouts, altered interiors (for which consent is not necessarily required) or other defects. Alternatively, a different selection of houses might have produced a different conclusion.

But these possibilities are irrelevant to assessing the subject house's aesthetic significance. The particular selection is entirely irrelevant because the process is invalid for this purpose. Under the guidelines which should be used, the house is aesthetically significant, as well as historically significant.

7. The use of the comparison to assess aesthetic significance is not valid, as discussed immediately above. The use of the process for assessing rarity and representativeness, one of its stated purposes (undeline passage, bottom of p. 37 above) , is valid, but not essential. This review has concerns with the selection of items and the conclusions, as discussed in 7.7 above.

8 THE FUTURE OF THE HOUSE

8.1 The liquidambar tree

Before any work can be done on the house (even if that were to be its demolition) the issue of the tree roots on the subject site must be resolved. It appears that the tree is dying and will have to be removed, in which case the roots can be dealt with without affecting its stability. The following comments are based on that assumption, but professional advice on that matter should be sought from an appropriately qualified arborist. The cost and responsibility issues are outside the scope of this review.

8.2 Conservation

Condition is not a criterion for assessing significance, but is a major issue in managing significance. Since the house is significant, and since despite its condition there is no suggestion that it poses a danger, it should be conserved, as long as that is physically feasible. The appropriate combination of the techniques defined in the Burra Charter (maintenance, preservation, restoration and reconstruction) should be employed to conserve the significant fabric.

Such conservation is feasible. A detailed schedule of conservation works will assist, but broadly, the recommendations in the report by Shreeji Consultant should be followed. The process will be simplified if the tree has been removed and the roots are therefore not growing, but revised engineering advice should be obtained. The following is simply an outline of the process typically recommended in such cases.

Lengths of root which pass under masonry walls will need to be removed. They should not simply be left to decay as the soil would not stabilise, at least within a practical time frame. Much of this work can be done from outside, but some flooring will have to be taken up. Some lengths of root which are simply on the surface should be easily removed. The timber framed walls are supported on piers and appear to be little affected.

Stormwater drains should be laid as soon as possible, ensuring that gutters are sound and falls are sufficient to ensure that all roof water is captured. It will then be necessary to allow the foundation material time to stabilise. At least a year is frequently required. That time could perhaps be used to investigate options for any alterations, additions or new development that may be of interest. This will guide subsequent conservation, which could be undertaken concurrently with any approved development.

Regard should be had to the gradings of significance. These will not become part of any listing, but are intended to guide any applicant in proposing either conservation or development, and Council in assessing any applications. It is not necessary to conserve fabric that is intrusive or of little significance, though consent will be required to demolish such fabric as well as for any development.

Once the site has stabilised, it will likely be necessary to dismantle some stone walling and some brickwork, and to carry out brick stitching as recommended in the Shreeji report. It should be easy for a skilled operator to patch the roughcast render. Internally, some floor framing will need to be packed to ensure it is level and some walls will need to be re-plastered. The external timber should be painted as soon as possible.

The introduction of new fabric to the extent necessary will affect the intactness, but not the integrity, of the item.

8.3 Development potential

The SEPP (Exempt and Complying Development) 2008 applies to heritage items only to a limited extent. Some work which would be exempt if the subject were not an item may be approved under the LEP Clause 5.10 (3). However most of the alterations likely to be contemplated will require consent.

The guiding principle for applicants and Council is that intrusive components and those of little significance may be removed or altered, while those of high significance should be retained. In practice this will mean that any alterations should be internal or at the rear. The roof space may be used, but no changes to roof planes visible from the street, such as dormers, should be permitted. It may be possible to insert subtly detailed windows into the side-facing gables or the rear-facing gambrel. The house can be extended to the rear or linked to a pavilion. This should be single storey, or perhaps a higher element, as long as it does not impinge on the silhouette of the item as seen from the street.

The garage and the derelict early outbuilding can be demolished.

The asbestos cement sheets should not present a hazard if they are not damaged. However if any damage is observed or occurs, appropriate advice should be obtained. If required, the material may be replaced with modern fibre cement sheets without any heritage implications.

The site is quite large and may be capable of subdivision. Subject to the relevant controls, and if necessary relying on the LEP heritage incentive clause 5.10 (10), possible uses the site of the item and/or any battle-axe subdivision could include a new house, secondary dwelling, town houses, professional rooms, or a child care centre.

The design of any alterations, extensions or new development will need to respect the significance of the item. This can be achieved using various approaches, and the process would be best guided by engaging a conservation architect at the outset.

8.4 Demolition controls, cost and equity issues

The Ku-ring-gai Development Control Plan provides as follows:

19B.2 DEMOLITION RELATED TO A HERITAGE ITEM

Objectives

1 To ensure that Heritage Items and all significant elements of Heritage Items are retained and conserved.

Controls

Demolition of a Heritage Item

1 The demolition of a Heritage Item, including buildings, other structures, trees and landscape features, is not supported.

2 Council will only consider the demolition of a Heritage Item where an applicant can satisfactorily demonstrate:

i) retention and stabilisation of the building or structure is unreasonable, taking into consideration the following:

- the heritage significance of the property;*
- whether the building constitutes a danger to the public.*

ii) all alternatives to demolition have been considered with reasons provided as to why the alternatives are not acceptable.

If the house is to be conserved, the structural faults will need to be corrected. The cost will be substantial, but this would not justify demolition under the above provisions, for the following reason.

The condition of the house is largely due to the failure of the original and subsequent owners to install stormwater drains. The IHO was made prior to the recent sale. The sale price presumably reflected the condition of the house, the possibility that it would be listed, and the likely cost and time delays involved in conserving it, including dealing with the tree as it was at the time.

The cost could be reduced if undertaken in conjunction with sympathetic alterations and additions, and possibly offset through development under the LEP clause 5.10 (10).

9 SELECTION OF ITEMS FOR COMPARATIVE ANALYSIS

9.1 Concerns

The requirements of the brief regarding the comparative evaluation are restated here:

- (v) Critically analyse the Paul Davies heritage assessment report including its heritage assessment, comparative analysis, conclusions and recommendations.
- (vi) The review of the Paul Davies comparative analysis must discuss properties located within the northern sections of the Ku-ring-gai local government area, as well as properties in the southern sections of the local government area.

9.2 Findings

The report compared houses which it identified as Inter-war Californian bungalows. Their distribution was as follows:

Suburb	Roseville	Lindfield	Killara	Gordon	Pymble	T'murra	W'r'ngah
Listed	4	5	12	2		1	2
In HCAs	3	2	1	5	1		

In respect of requirement (v) of the brief it has been shown that the selection of items

- was irrelevant for the purpose of assessing the subject house's aesthetic significance, because the use of the comparative evaluation process is simply invalid for that purpose
- was of limited use for purposes of assessing the item's rarity or representativeness, because the sample included mainly items which are not sufficiently similar to assist the comparison, and did not include the nearest reasonably similar items, 51 and 53 Kissing Point Road
- nevertheless included a small number of reasonably comparable items, so that with the inclusion of 51 and 53 Kissing Point Road, it was possible for this peer review to conclude that the subject house is representative, and not rare.

9.3 Distribution and significance of items in the sample

Requirement (vi) of the brief reflects wider concerns about the nature and distribution of listed items and items in HCAs in Ku-ring-gai, some of which are actually raised in the report itself. It states in 4.2,

The majority of comparable heritage listed houses in the Ku-ring-gai Council area (detailed in Attachment 1) were found to be:

- *substantial dwellings, that is larger and of individual design in contrast to more standard and representative dwellings*
- *known to be architect designed or attributed to a particular architect, and*
- *of a demonstrably higher quality than the residences that are contributory buildings within precincts.*

The report continues,

With regard to the comparative houses in Attachment 2, the following observations are made:

- *The subject house at 69 Kissing Point Road has greater similarity to the comparative houses within HCAs than to the comparative houses in Attachment 1 which are locally heritage listed.*
- *Some of these comparative houses within HCAs are substantial dwellings which are also fine examples of their style (for example in Wolseley Road Lindfield), and yet were not individually listed as heritage items. This suggests that the threshold for listing of this type of dwelling is well-established.*

The foregoing material raises a number of questions to which this review offers the answers which follow.

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Q: (Regardless of the validity of the process) does the sample reflect the distribution of listed Californian bungalows across Ku-ring-gai ? Of significant ones?

A: Presumably the distribution of significant listed Californian bungalows across Ku-ring-gai is reflected in the selection, which appears to be thorough. Whether that in turn reflects the actual distribution of these or other significant items is difficult to say. The suburbs within the LGA developed in different ways in different periods.

Q: What about the distribution of items generally, and of HCAs, across Ku-ring-gai?

A This question is so wide that the present review can shed no light on it.

Q: Historically, has there been a particularly high threshold for listing in Ku-ring-gai, with a particular requirement for a level of architectural excellence?

A: The SHI sheets show that all of the listed items in the sample were identified in the 1987 study. This was a pioneering study undertaken before the Heritage Council formally promulgated a 1 procedure in 1996.. The Study states (5.1): *The criteria used in the Ku-ring-gai study are based on those use by the Australian Heritage Commission, the National Trust of Australia and evident in the work of the Heritage Council.*

They were: historic, scientific, cultural, social, architectural or technical, natural, and aesthetic significance. The levels of significance used were municipal (or local,) and state.

Of 688 items, 617 are shown as having architectural significance, as well as historic significance, mostly at municipal level. Of these, 111 of 115 in Killara, and 74 of 87 in Turramurra, are shown as having architectural significance. (Three of those not having it are noted as having unsympathetic alterations.)

All the listed houses chosen for the comparative evaluation have it. All the houses listed from the Perumal Murphy Alessi study of 2006 have aesthetic significance.

This is hardly surprising: intact period houses are often aesthetically significant, or have streetscape appeal. The study states in 6.3 , *the most outstanding aspect of Ku-ring-gai's environmental significance is the quantity, quality and diversity of its 20th century domestic architecture.*

There does appear to be a historic pattern of listing only items which appeared to be of high architectural quality.

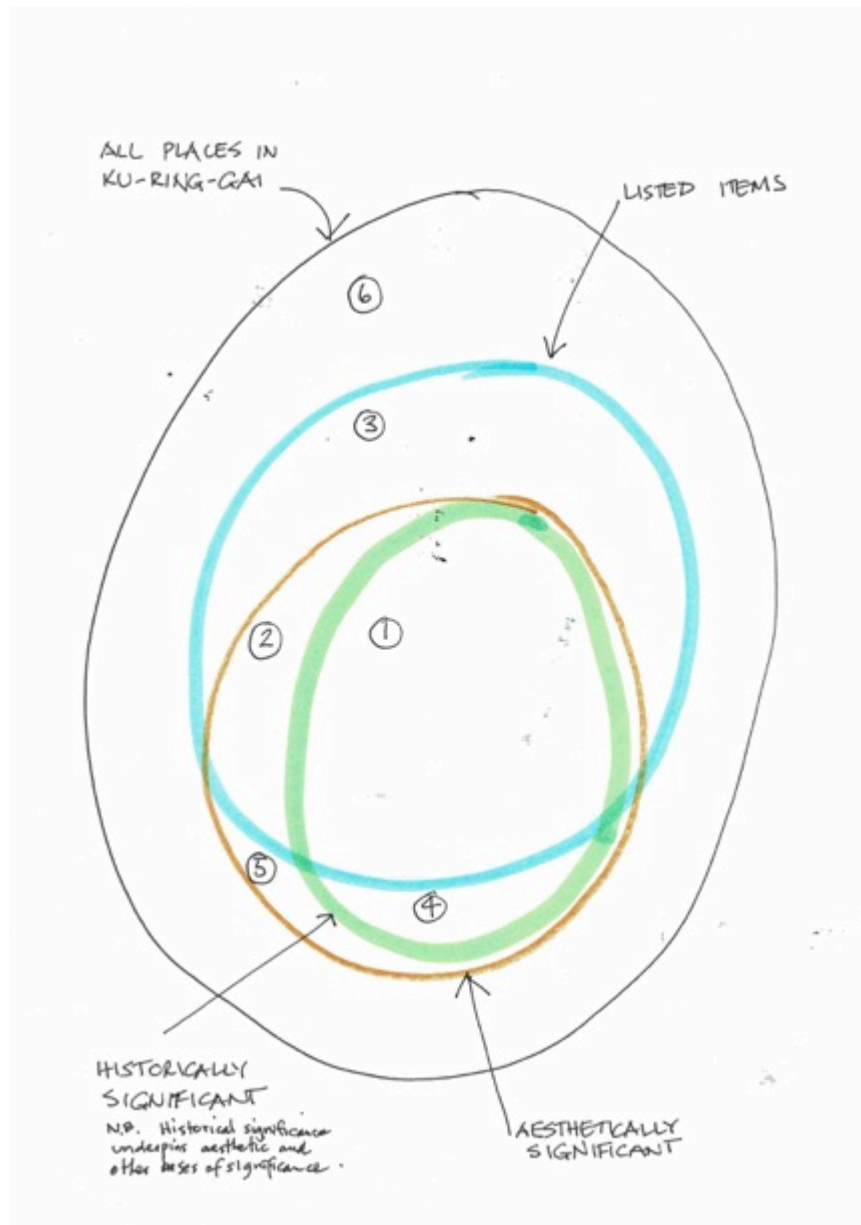
Q: Does this mean that less obviously aesthetically significant items or items with historic but no aesthetic significance, have not been listed?

A: This seems possible, but the present review cannot assist with the answer. The "Pymble cottages" on the Pacific Highway, are reasonably only shown as historic, but they could hardly have been ignored.

Q: Is there currently a threshold of architectural excellence for listing?

A: If there were, it would be contrary to the Heritage Council's gazetted criteria and guidelines, and potential items which are significant for other reasons would remain at risk. Council's planning staff advise that there is no such threshold.

The community and indeed the heritage profession's understanding and appreciation of heritage continues to evolve. Council appears to aware of possible gaps in its Schedule. The diagram and notes below may be of use in analysing the need.



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- 1 Aesthetically and historically significant, and listed: no problem.
- 2 Historically significant and listed: no problem (though inventory may claim unwarranted aesthetic significance)
- 3 Neither historically nor aesthetically significant, yet listed. Either poorly assessed, or altered, possibly without consent. IN practice, will be resolved when a DA is assessed.
- 4 Historically but not aesthetically significant, and not listed – perhaps for that very reason. Unprotected and at risk, particularly as significance may not be obvious, unless in HCA.
- 5 Both aesthetically and historically significant, yet not listed. At risk, unless in HCA, as many are.
- 6 Not significant, not listed: no problem.

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APPENDIX A: STATE HERITAGE INVENTORY FORM

ITEM DETAILS						
Name of Item	"The Gables"					
Other Name/s Former Name/s						
Item type (if known)	Built					
Item group (if known)						
Item category (if known)	House					
Area, Group, or Collection Name						
Street number	69					
Street name	Kissing Point					
Suburb/town	Turramurra				Postcode	2074
Local Government Area/s	Ku-ring-gai					
Property description	Lot 4 DP 31925					
Location - Lat/long	Latitude				Longitude	
Location - AMG (if no street address)	Zone		Easting		Northing	
Owner	Private					
Current use	Residential					
Former Use	Residential					
Statement of significance	<p>The house has representative historical significance at the local level in Ku-ring-gai. It was one of the earliest small bungalows built on the north side of Kissing Point Road following the subdivision of the orchard which had been established on Boyd's grant.</p> <p>It has representative aesthetic significance at the local level as an individually designed small house with the blend of Federation Arts and Crafts and inter-war Californian bungalow characteristics typical of the reduced number of houses designed and built during the First World War.</p>					
Level of Significance	State <input type="checkbox"/>			Local <input checked="" type="checkbox"/>		

DESCRIPTION	
Designer	Unknown
Builder/ maker	Unknown
Physical Description	<p>The house was completed in or about 1919. It was of one storey and had a front veranda, and was thus a bungalow. It was asymmetrical, with the front door facing the street but set back, at the side. There was an inset veranda under the main roof at the rear.</p> <p>The external walls were generally cavity brick on rock-faced squared coursed sandstone dwarf walls. Examination of the roof and wall junction in the space above the laundry shows that it is the outer skin which was loadbearing, as was commonly the case at the time. The brick at the front was red-brown face work in stretcher bond to about sill level, with face brick quoins and roughcast render above. The side and rear walls were also rendered, with bullnosed face brick window sills.</p> <p>The internal walls behind the transverse corridor were timber-framed, as were the external walls on the three sides of the inset veranda. This has been enclosed, as discussed below, and there is no record of the cladding, doors or windows. However a short length of the end wall of the enclosed veranda is clad with rusticated checked weatherboards to about 900 mm, with battened fibro sheets above. The same cladding is evident on the derelict shed. It is most likely that the walls of the inset veranda were clad in this way, as were some entire houses of the period. There would have been windows, perhaps a continuous run of casements, between the lounge room and veranda, substituted for fibro panels.</p> <p>The rear wall of the present kitchen is roughcast rendered like the other external walls, but it is timber-framed, on the usual sandstone base. It appears to be original, clad with fibro to which the roughcast render has been applied, with chicken wire possibly aiding adhesion. One may speculate that a lack of money or a shortage of bricks accounts for this.</p> <p>The gables were clad in battened asbestos cement sheets. The veranda floor was tinted concrete. The flat veranda roof was probably covered with bituminous felt. It was supported on short square section posts on rock-faced coursed sandstone piers.</p> <p>Both front windows comprise three leadlight casement panes with panelled skirts below sill level, and are fixed on the outer face of the brick walls and protected by a narrow hood. The small pair of front doors is fully glazed with multiple rectangular pieces of obscure glass set in leadlight making up four panes per door leaf.</p> <p>Side windows are set within the wall thickness, again casements in groups of three, each with two larger panes, the lower having obscure glass, and two small panes of coloured glass above.</p> <p>The house provides a relatively early example of the use of "Fibro" or asbestos cement sheets, which began to be imported in about 1912. As well as the gables and cladding the rear veranda walls, it appears to have been used for some internal wall linings.</p>

	<p>Brick walls were solid plastered internally. The joints in the internal timber framed walls were covered with battens extending between the skirting board and picture rail, which was at door head height and formed the top architrave to the doors. The side architraves were tapered in elevation. The skirting boards, architraves, cover battens and elements of built-in fixtures were simple rectangular sections, and would have been dark stained. The doors were three-panelled, high-waisted and similarly detailed. Ceilings were patterned fibrous plaster, generally in panels, with decorative cornices.</p> <p>One room finished differently was the entrance lobby, where the external face brick to mid height is continued, separated from the plastered wall above by a picture rail or ornament shelf at an unusually low height.</p> <p>Face brickwork was also used on the false or unfinished fireplace in the lounge room. The false chimney breast was panelled and battened as described above.</p>					
Physical condition and Archaeological potential	<p>The building is showing signs of internal and external cracking and movement. Evidence of damp penetration can also be found internally. A structural engineering report was commissioned in 2017 which has concluded that the damage can be repaired and made recommendations as to how this can be achieved.</p>					
Construction years	Start year	1915	Finish year	1919	Circa	X
Modifications and dates	<p>The exterior of the front of the house is almost intact. The red terra cotta Marseilles pattern roof tiles were replaced with the same type, in brown, following a storm in recent decades but the red finials were retained.</p> <p>The flat roof of the veranda is covered with metal pan roofing, probably replacing built-up bituminous felt which is not very durable.</p> <p>The front fence is shown in a photograph in the NBRs report as medium height capped piers, probably roughcast rendered brick, with a similar base infilled with top and bottom rails, probably timber with woven wire between them. The style suggests that it was the original fence. The present fence is similar in that it has piers and a base course, but is much lower and the piers appear to be more widely spaced. It is rendered brick, not rendered concrete as stated by Davies.</p> <p>The wall between the lounge room and the back bedroom is timber-framed and has two offsets, providing a built-in cupboard in the back bedroom. It intrudes into the lounge room, where its detailing suggests a chimney breast or a display cabinet, subsequently blanked off. It does not intersect with the pattern of the ceiling in the lounge room but the dimensions suggest that the wall was originally straight. There certainly have been alterations in this area, but there is no obvious explanation or sequence of events.</p> <p>There is a similarly detailed servery between the present dining and lounge rooms. Behind a modern facing the original stained timber can be seen. All the joinery would have been similarly stained. It is now painted.</p> <p>The inset rear veranda was enclosed at an unknown time. The wall and windows between it and the lounge room were removed, either then or later, as there is now a wide opening.</p>					

	<p>The enclosing wall was in turn removed when a flat-roofed garden room was added in 2003. The drawings for the relevant development application are reproduced below. The opening between the dining and lounge rooms has been widened, and all the walls in this area are now lined with plasterboard.</p> <p>A toilet has been added, next to the laundry. A passage has been created by reducing the size of the back bedroom or the laundry, with an attic ladder leading to a platform above the laundry and thence into the roof space. The bathroom fixtures and fittings date from the early post war period and the door is modern. The kitchen is also mid-late twentieth century.</p> <p>The original garage has been demolished and a larger garage constructed in the north-east corner of the site.</p>
Further comments	<p>Site was initially identified in the Paul Davies Architects Heritage Review – North (2010) as a potential Heritage Item requiring further investigation. An Interim Heritage Order applying to the property was gazetted on 19 July 2017.</p>

HISTORY	
Historical notes	<p>The area north of Sydney Harbour was occupied for thousands of years by people speaking the Kuringgai (Guringgai) language. Clans of this language group lived as far north as Brisbane Water, and several clans gave their names to localities including Turramurra, derived from the <i>Terramerragal</i> clan which lived in the wooded heights east of the Lane Cove River. Many of this clan perished in the smallpox epidemic which followed European settlement in 1788; surviving generations were progressively alienated from their land.</p> <p>Due to its distance from Sydney and poor road access, Turramurra's European population was small prior to the construction of the North Shore railway. In 1826 former soldier and veteran of the Napoleonic Wars, Thomas Boyd, was granted 100 acres of land at Turramurra, where he planted an orchard and built a residence. Boyd lived on his grant which was named Toulouseville or Toulisville and was appointed a constable and pound keeper.</p> <p>Boyd's son James purchased his father's land in 1856, extended the orchard and in 1878 offered the district's first subdivision (the Toulouseville Estate), 'consisting of over ONE HUNDRED ACRES subdivided into convenient-sized FARM ALLOTMENTS' (<i>Sydney Morning Herald</i>, 15 January 1878, p.9) The land, comprising 18 lots, was described as well-timbered aside from the twelve acres that had been cleared and planted as an orchard and that came with the farm cottage (<i>Sydney Morning Herald</i>, 12 January 1878).</p> <p>Sales must have been slow as a few years later, in 1882, the land was renamed Boyd's Orchard Estate and re-offered for sale (<i>Sydney Morning Herald</i>, 16 October 1882). Centred on Kissing Point Road, a government road constructed during the 1850s from Lane Cove River, the Estate was purchased in 1885 by the Port Jackson Land and Investment Company, formed that year for the purpose with a capital of £50,000 (<i>Sydney Morning Herald</i>, 19 October 1885, p.9).</p>

However the 'dullness' of the market and slow construction of the last part of the North Shore Line from St Leonards to Milsons Point saw the Company halt land auctions until the 'Milsons Point Railway' opened during 1893 (*Daily Telegraph*, 1 February 1887, p.3, 1 April 1893, p.1). At that time the Estate was redrawn to increase the number of residential sites, although many of the blocks were still large enough for the orchards and poultry farms common in the district: 'This Estate...has been divided into allotments and blocks to suit all classes of purchasers and as the Railway Extension to Milson's Point opens on MONDAY, the Auctioneers invite buyers to attend this sale, and secure a site in the Estate' (*Daily Telegraph*, 29 April, 1893, p. 3).

During 1902 more residential lots were added and the estate was redrawn as Deposited Plan 3895 (LPI Vol. 1386, Folio 82, 6 January 1902). In 1915 Francis James Lynch purchased the western half of Lot 77, Section 5. This half lot was still large enough for a 29 metre frontage to Kissing Point Road, and was 306 metres deep (LPI Vol. 2628 Folio 121, 3 December 1915). At this time the north side of Kissing Point Road to what is now Monteith Street was occupied by just five residences, although this number increased to fifteen by 1918.

The pattern of subdivision resulting from the various sales was different, the major change in the latter offerings being the increased number of residential blocks. In the 1893 subdivision the Boyd/Jersey Road loop was formed and the surrounding lots divided into smaller landholdings. This doubled the number of lots from 50 in 1882 to 102 in 1893.

The Boyd's family cottage was purchased in 1893 and was redeveloped by Ivan Au Prince in 1894 into a property named Hillview (now 1334 Pacific Highway) and enlarged in several stages.

Frank Lynch purchased the site in 1915, when it was had a 29 metre frontage to Kissing Point Road and was 306 m deep. Lynch is shown as the occupant in Sands' Sydney Directory for 1916, but the house was not complete. Lynch invited tenders in the Construction and Local Government Journal of 20 January 1919 under the classification "Alterations and Additions," but the physical evidence and the notation on a photograph mentioned in the NBRs report confirm that the work involved completion of the unfinished house, rather than extensions. In brief, the front veranda was added and some rooms were made habitable. There is no record of the designer or the builder for either stage. Lynch was a "car builder" – a builder of motor vehicle bodies and railway coaches. While there is no evidence, it is entirely conceivable that he applied his trade skills to home building, particularly of some fixtures and detailing, with occasional unusual results.

Following Frank Lynch's death in 1942, the house passed to his widow Annie and later to her two sons Geoffrey and Francis. During 1961 Lot 77 and neighbouring lots were retitled as Deposited Plan 32925; 69 Kissing Point Road is Lot 4 (LPI Vol.9092, Folio 62, 15 December 1961). Shortly afterwards a narrow strip of land was added to the rear of the block, Lot 20 of neighbouring Deposited Plan 206712 (LPI Vol. 9124, Folio 146, 22 February 1962).

It is not clear when 69 Kissing Point Road acquired the name "The Gables." No name is listed for the house prior to Sands' demise in 1933 nor in the Kuring-Gai council records.

THEMES	
National historical theme	4. Building Settlements, town and cities
State historical theme	6. Land Tenure 10. Townships 24. Housing

APPLICATION OF CRITERIA	
Historical significance SHR criteria (a)	The house has historical significance in Turramurra and the Ku-ring-gai LGA. It was one of the earliest small bungalows built on the north side of Kissing Point Road and has survived largely intact. It shows evidence of, and is associated with a significant human activity in the area: its conversion from an orchard to a residential suburb including relatively modest houses beginning in the late Federation period, during the First World War.
Historical association significance SHR criteria (b)	
Aesthetic significance SHR criteria (c)	An individually designed small house with the blend of Federation Arts and Crafts and inter-war Californian bungalow characteristics typical of the reduced number of houses designed and built during the First World War. When viewed from the street and any direction other than the rear, it presents as an integrated composition, with pleasing proportions, well balanced massing, and a consistent hierarchy of materials. The interior detailing is simple, but consistent with the Arts and Crafts philosophy and style and modest scale of the house, as is the ordinary standard of workmanship.
Social significance SHR criteria (d)	
Technical/Research significance SHR criteria (e)	
Rarity SHR criteria (f)	
Representativeness SHR criteria (g)	The house has representative historical significance. It is one of the earliest small bungalows built on the north side of Kissing Point Road following the subdivision of the orchard which had been established on Boyd's grant. It is one of the few intact surviving houses from that subdivision, but it is representative in the Ku-ring-gai LGA as it demonstrates the typical process of subdivision of the early large grants along the ridge (Pacific Highway) which had been used for timber-getting and agriculture. It has representative aesthetic significance as a largely intact individually designed small house with the blend of Federation Arts and Crafts and inter-war Californian bungalow characteristics typical of the reduced number of houses designed and built during the First World War.

HERITAGE LISTINGS	
Heritage listing/s	

INFORMATION SOURCES				
Include conservation and/or management plans and other heritage studies.				
Type	Author/Client	Title	Year	Repository
Written	Paul Davies Architects	Historical Assessment: 69 Kissing Point Road, Turrumurra	2017	Ku-ring-gai Council
Written	Shreeji Consultants	Structural Inspection: 69 Kissing Point Road, Turrumurra	2017	Ku-ring-gai Council
Written	Paul Davies Architects	HCA Review – North	2010	Ku-ring-gai Council
Written	Ku-ring-gai Council	Historic BA Registers and Indexes		Ku-ring-gai Council
Written	Sands	Street Directory		Ku-ring-gai Library

RECOMMENDATIONS	
Recommendations	Include as a Heritage Item within Schedule 5 of the Ku-ring-gai Local Environment Plan 2015.

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SOURCE OF THIS INFORMATION			
Name of study or report	Peer Review of a Heritage Assessment of “The Gables”, 69 Kissing Point Road, Turrumurra	Year of study or report	2018
Item number in study or report			
Author of study or report	Graham Hall		
Inspected by	Graham Hall		
NSW Heritage Manual guidelines used?		Yes X	No <input type="checkbox"/>
This form completed by	Maxine Bayley and Graham Hall	Date	March 2018

IMAGES - 1 per page

Image caption	Boyd's Orchard Estate, 1902				
Image year	1902	Image by		Image copyright holder	NLA

BOYD'S ORCHARD TURRAMURRA

OPPOSITE THE STATION
Choice Building & Residential Sites
FOR AUCTION SALE ON THE GROUND
SATURDAY THE 12TH APRIL 1902 AT 3.30 P.M.
BATT, RODD & PURVES L^{TD}
AUCTIONEERS.

553 FT Height above Sea Level Turramurra Station 553 FT

TERMS:-
DEPOSIT - 20 per cent.
Balance on completion
or in Six Half yearly
Instalments with Interest
added at 5% per annum
on the Unpaid Balance.
No Interest will be charged
if paid within Six Months
from date of Sale.

ATCHISON & SCHLEICHER
Civil Engineers & Surveyors
Licensed Surveyors
92 PITT ST
SYDNEY.

VENDORS
The Jackson Land & Investment Co L^{TD}
FRANCIS W. KING
Manager
84 PITT ST SYDNEY.

SOLICITORS TO VENDORS
Osborne & Wilkinson
18 Castlereagh St
Sydney.

All Streets & Roads in the Estate 66 FT Wide.
Shaded Lots are sold. All Dimensions subject to Deposited Plan.

TORRENS TITLE.

Image caption	Deposited Plan 3895 (detail)				
Image year	1902	Image by		Image copyright holder	LPI

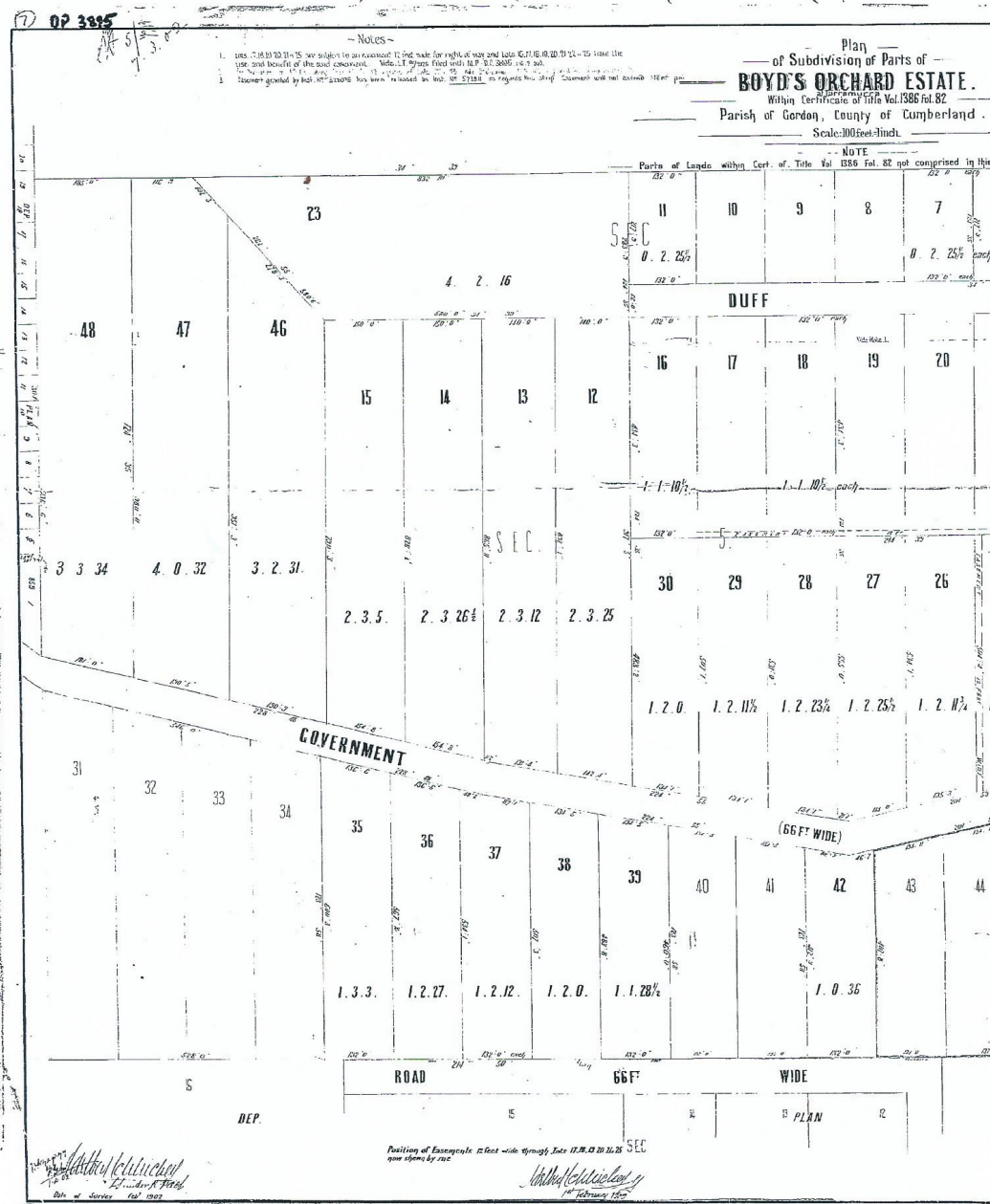


Image caption	LPI Vol.2628, Folio 121, 1915 (detail)				
Image year	1915	Image by		Image copyright holder	LPI

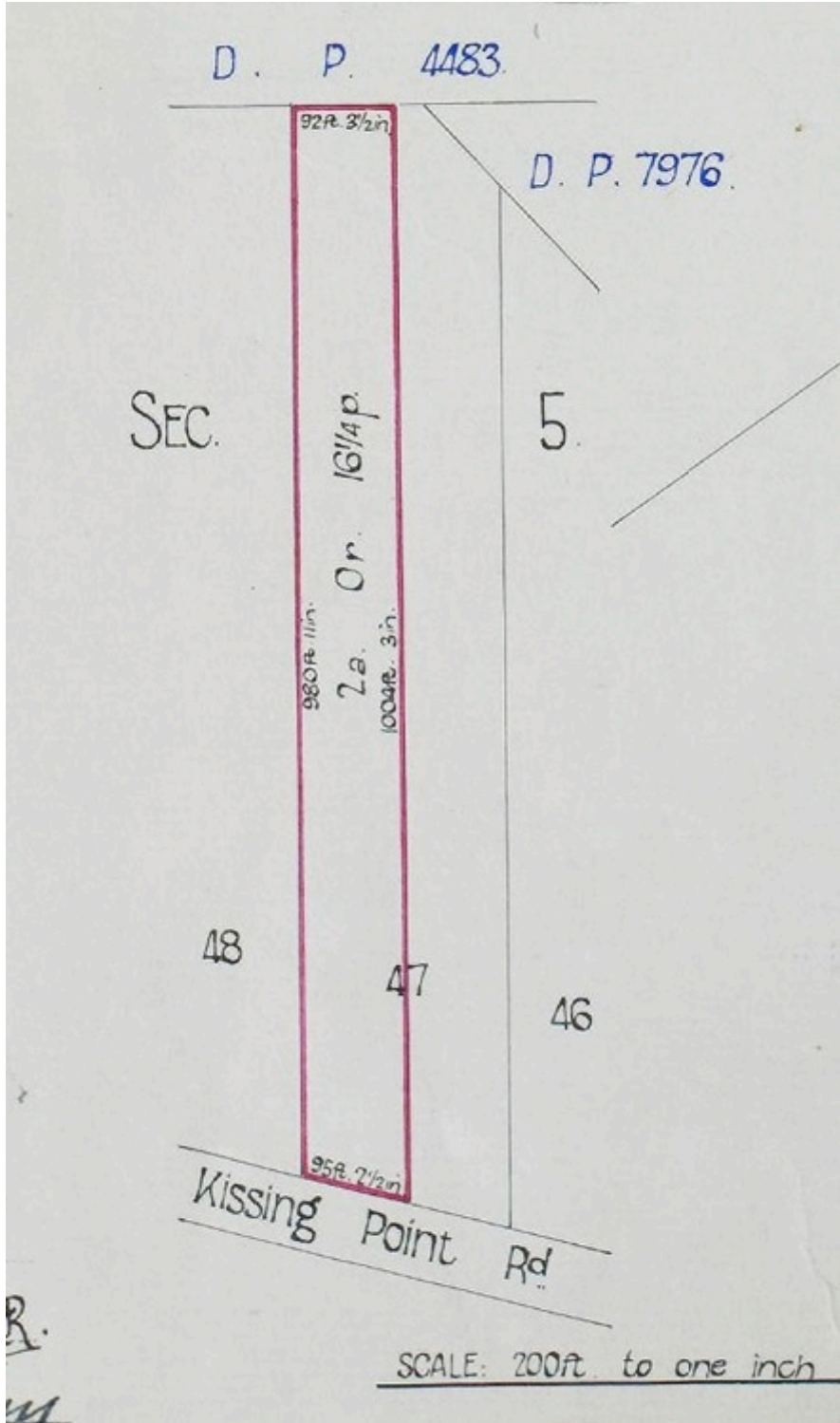


Image caption	"The Gables" – 69 Kissing Point Road, Turrumurra				
Image year	2018	Image by	Graham Hall	Image copyright holder	Graham Hall / Ku-ring-gai Council



Image caption	"The Gables" – 69 Kissing Point Road, Turramurra: view from the front garden				
Image year	2018	Image by	Graham Hall	Image copyright Image copyright holder	Graham Hall / Ku-ring-gai Council



Image caption	“The Gables” – 69 Kissing Point Road, Turramurra, eastern elevation showing gable with timber battens, gable vent, taper-cut bargeboard, roughcast stucco and sandstone foundations				
Image year	2017	Image by	Shreeji Consultants	Image copyright holder	Shreeji Consultants / Ku-ring-gai Council



Image caption	Building eastern elevation and rear elevation showing sunroom addition, rear gablet and roughcast chimney				
Image year	2017	Image by	Shreeji Consultants	Image copyright holder	Shreeji Consultants / Ku-ring-gai Council



Image caption	Living Room showing original detailing including picture rails, decorative ceilings, decorative cornices dark brick fireplace				
Image year	2017	Image by	Realestate.com.au	Image copyright holder	Realestate.com.au



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Image caption	Dining room featuring fire place, coloured window, picture rail, skirting board				
Image year	2017	Image by	Realestate.com.au	Image copyright holder	Realestate.com.au



Image caption	Ceiling detail				
Image year	2017	Image by	Maxine Bayley	Image copyright holder	Ku-ring-gai Council



APPENDIX B: 1996 ASSESSMENT CRITERIA AND GUIDELINES



HERITAGE ASSESSMENTS

HISTORICAL SIGNIFICANCE (evolution and association)

Historical Significance

Significant because of the importance of an association with, or position in, the evolving pattern of our cultural history — with phases, activities or people.

Include

- shows evidence of a significant human occupation or activity
- is associated with a significant activity, event, historical phase or person
- maintains or shows the continuity of a historical process or activity

Exclude

- has incidental or unsubstantiated connections with historically important people, events, activities or processes
- provides evidence of people, events, activities or processes that are of dubious historical importance
- has been so altered that it can no longer provide evidence of a particular association

Representativeness

Significant because they represent well, an important class of items or environments that have historical/associative significance.

Include

- has the principal characteristics of an important class or group of items
- has attributes typical of a particular way of life, philosophy, custom, process, design, technique or activity
- is a significant variation to a class of items
- is part of a group which collectively illustrates a representative type
- is outstanding because of its setting, condition or size

Exclude

- is a poor example of its type
- does not include or has lost the range of characteristics of a type
- does not represent well the characteristics that make up a significant variation of a type

Rarity

Significant because it represents a rare, endangered or unusual aspect of our history or cultural environment.

Include

- provides evidence of a defunct custom, way of life or process
- demonstrates a process, custom or other human activity that is in danger of being lost
- is a scarce example of a particular style, custom or activity
- shows unusually accurate evidence of a significant human activity
- is the only example of its type

Exclude

- is not rare
- is numerous but under threat
- is rare in a local context but numerous or abundant nearby



HERITAGE ASSESSMENTS

AESTHETIC/CREATIVE SIGNIFICANCE (scenic/architectural qualities/creative accomplishment)

Aesthetic Significance

Significant for strong visual, or sensory appeal or cohesion; landmark qualities; creative and/or technical (including architectural excellence) qualities; creative and/or technical (including architectural) excellence.

Include

- shows or is associated with, creative or technical innovation or achievement
- is the inspiration for a creative or technical innovation or achievement
- is aesthetically distinctive
- has landmark qualities
- exemplifies a particular taste, style or technology

Exclude

- is not a major work by an important designer or artist
- has lost its design or technical integrity
- its positive visual or sensory appeal or landmark and scenic qualities have been more than temporarily degraded
- has only a loose association with a creative or technical achievement

Representativeness

Significant because it represents an important class of significant items or environments.

Include

- is a fine example of its type
- has attributes typical of a significant process, design or technique
- is a significant variation to a class of items
- is part of a group which collectively illustrates a representative type
- is outstanding because of its, setting, condition or size

Exclude

- is a poor example of its type
- does not include or has lost the range of characteristics of a type
- does not represent well the characteristics that make up a significant variation of a type

Rarity

Significant because it represents a rare, endangered or unusual aspect of our history or cultural environment.

Include

- provides evidence of a defunct custom, way of life or process
- demonstrates designs or techniques of exceptional interest
- is a scarce example of a particular style, custom or activity
- shows unusually accurate evidence of a significant human activity
- is the only example of its type

Exclude

- is not rare
- is numerous but under threat
- is rare in a local context but numerous or abundant nearby



HERITAGE ASSESSMENTS

TECHNICAL/RESEARCH SIGNIFICANCE

(archaeological, industrial, educational, research potential and scientific values)

Technical/Research Significance

Significant because of its contribution or potential contribution to an understanding of our cultural history or environment.

Include

- is yielding, or has the potential to yield new or further substantial scientific, historical, cultural, technical and/or archaeological information
- is an important benchmark or reference site or type
- provides evidence of past technologies or cultures or human behaviour patterns that is unavailable elsewhere

Exclude

- has little research and/or educational potential
- only contains information that is already well researched or documented or is readily available from another site or resource
- the knowledge gained would be irrelevant to research and education on science, human history, technology or culture

Representativeness

Significant because it represents an important class of significant items or environments.

Include

- is a fine example of its type
- has attributes typical of a particular way of life, philosophy, custom, process, design, technique or activity
- is a significant variation to a class of items
- is part of a group which collectively illustrates a significant type
- is outstanding because of its setting, condition or size

Exclude

- is a poor example of its type
- does not include or has lost the range of characteristics of a type
- does not represent well the characteristics that make up a significant variation of a type

Rarity

Significant because it represents a rare, endangered or unusual aspect of our history or cultural environment.

Include

- provides evidence of a defunct custom, way of life or process
- demonstrates designs or techniques of exceptional interest
- demonstrates a process, custom or other human activity that is in danger of being lost
- is a scarce example of a particular style, custom or activity
- shows unusually accurate evidence of a significant human activity
- is the only example of its type

Exclude

- is not rare
- is numerous but under threat
- is rare in a local context but numerous or abundant nearby



HERITAGE ASSESSMENTS

SOCIAL SIGNIFICANCE (contemporary community esteem)

Social Significance

Significant through association with a contemporary community for social, spiritual or other reasons.

Include

- is important for its associations with an identifiable group
- is crucial to a community's sense of place

Exclude

- is only important to the community for amenity reasons

Representativeness

Significant because it represents an important class of significant items or environments.

Include

- has the principal characteristics of an important class or group of items valued by a community
- is a seminal or optimal example of a class of items valued by a community
- is outstanding because of its integrity of the esteem in which it is held

Exclude

- is a poor example of its type
- does not include or has lost the range of characteristics of a type
- does not represent well the characteristics that make up a significant variation of a type

Social Significance and Rarity

Significant because it represents a rare, endangered or unusual aspect of our history or cultural environment.

Include

- is a scarce example of a particular style, custom or activity esteemed by a community
- shows rare evidence of a significant human activity important to a community

Exclude

- is not rare
- is numerous but under threat
- is rare in the immediate vicinity but numerous or abundant nearby

APPENDIX C: CURRICULUM VITAE OF GRAHAM ALLEN HALL

POSITION

Partner, Graham Hall and Partners, Architects and Heritage Consultants, providing

- architectural design, documentation and contract administration for heritage projects;
- heritage and urban design advisory services to councils;
- design advice to other architects and building designers, Statements of Heritage Impact for DAs and planning proposals, and Conservation Management Plans / work schedules.
- Expert witness, Land and Environment Court.

QUALIFICATIONS

- Bachelor of Architecture, University of New South Wales, 1965
- Master of Building Science, University of Sydney, 1968
(RAIA prize for original research Thesis)
- Master of Business Administration, Macquarie University, 1980
- Graduate Certificate in Heritage Conservation, University of Sydney, 2000
(Dean's Honour List - Distinction average)
- Fellow of the Royal Australian Institute of Architects
- Registered as an Architect in NSW in 1966 (No. 2600)
- Listed as a conservation architect by the NSW Office of Environment and Heritage
- WorkCover OH&S General Induction for Construction Work in NSW card
- National Teaching and Learning Certificate.

CAREER BACKGROUND

Student and architect, NSW Government Architect's Office, 1960-71. Then five years with private firms in London, one in Sydney and the NSW Housing Commission. Next, several years in NSW Govt. asset management and policy positions including advising Premier on natural resources and infrastructure policy; Planning Manager, Police Properties; assisting Mr. John Mant with a review of the Dept. of Housing; and 7 years advising successive Ministers for Police/Emergency Services on finance and resource allocation. Since leaving the Public Service in 1999, have worked exclusively as a conservation architect and heritage consultant.

Part time teacher of Management, TAFE; lecturer, Strategic Business Policy, UTS, 1990s.

SUMMARY OF HERITAGE-BASED EXPERIENCE

Currently Heritage Adviser to Dubbo Regional (previously Dubbo City and Wellington) and Forbes Shire Councils since 2010; Mid-Western Regional Council from 2016. Relieved at Marrickville Council replacing full time staff position two days/week in 2006, 2009, 2013, 2014, 2015 and April 2016- Sept 2017 and currently on ad hoc basis (now incorporated into Inner West Council.)

Services include pre-DA advice to applicants, assessment of DAs and planning proposals, administration of heritage grants, undertaking heritage studies, drafting DCPs and policies, advice on conservation of privately owned and council heritage assets; participation in heritage committee meetings; talks, heritage awards and staff training, reviewing/writing inventory sheets.

Was Heritage and Urban Design Adviser to Fairfield City Council 2002-2013, Walgett Shire 2002-2008, Coonamble Shire 2004-2008, Moree Plains Shire 2004-06, Narromine Shire 2009-13. Relieved at Hunter's Hill Council in 2005 and 2010.

Wrote heritage chapter of DCP for Fairfield, Dubbo and Narromine; and standard heritage-based DA conditions for Marrickville Council.

Co-ordinated community-based heritage studies in Walgett, Moree and Fairfield (the first such study undertaken in the metropolitan area). Assessed 97 proposed additions to or deletions from heritage schedules in the City of Parramatta. Reviewed 23 potential items in north-west NSW for National Parks and Wildlife Service. Recently completed an independent review of objections to proposed new listings and conservation areas in Marrickville LEP (similar review in Dubbo 2013).

Conservation Management Plans attracted major government grants for Coonamble Museum and State-listed Old Dubbo Gaol. Conservation of Forbes Town Hall: project came second in 2014 Property Institute awards for heritage conservation.