

## **39 Dudley Street, Coogee**

### **Peer Review of the John Oultram Heritage Assessment Report**

**Stephen Davies, Director Urbis**

I have been engaged by Adam Touma, owner of the subject property, to prepare a peer review of the subject report and to provide feed-back on the heritage significance of the subject property.

I inspected the interior and exterior property on the 29<sup>th</sup> January 2019 and walked the neighbourhood to particularly familiarise myself with the local heritage items and buildings of the inter-war period.

The report by John Oultram is a very professional document, is well researched and well argued. It makes a very clear assessment of the contribution the building makes to the local government area.

John Oultram is a trusted heritage advisor to Council's, including the eastern suburb's Councils, and has a very informed knowledge of the comparative value of this property.

#### **Background**

I agree with the conclusion that:

- 39 Dudley Street is a modest and typical example of a builder built, Californian style bungalow
- The property does not meet the Heritage Manual criteria for identification as a place of local significance
- There are no heritage considerations that would preclude its demolition

39 Dudley Street is not a heritage item, is not within or near a heritage precinct, does not reach the threshold for heritage listing as an item when compared with heritage listed buildings from the same period in the suburb and is in a noticeable location where it cannot be argued that it has been overlooked in earlier studies. Perhaps the difficulty of this site is that it is an attractive inter-war period house that was not significant enough to heritage list but when threatened with removal upsets the local community as they do not wish to see change or a new development.

Council should, if they wish to lower the threshold for heritage listing, review the former studies and add a wide range of buildings to the heritage lists. I would suggest this could extend into many hundreds of buildings. However, if the intent of heritage listing is to retain significant buildings and precincts based on the established thresholds and criteria, the IHO fails.

Any review should have a full Council area focus and be advertised and be debated as an approach to planning in the area. The current zonings have regard for the current heritage status of properties and these would have to be reviewed in a more comprehensive manner after the heritage review was undertaken.



## 2.0 HISTORICAL BACKGROUND

The John Oultram report has researched the property and has provided the professional information for the conclusions reached.

## 4.0 STATEMENT OF POTENTIAL SIGNIFICANCE

The research has clearly shown that the building does not have historic, associational, social, aesthetic or technical significance to meet the threshold for individual listing. It is not socially significant as no one has expressed interest in this building until it was the subject of a higher density development. The tendency is now for the attachment to come to a place through the fear or dislike of change. I ponder if it was proposed to be replaced by a single dwelling whether it would have been subject to an IHO or a potential listing.

## 5.0 COUNCILS HERITAGE ASSESSMENT

Irrespective of the history and accuracy or otherwise of the council reasons for listing, the IHO raises a very fundamental and important issue that we would suggest threatens the basis of heritage planning in Randwick.

If Council intends to randomly list properties (that is outside undertaking a comprehensive heritage study), through the IHO process, as a response to a DA that may be submitted for a site with an older building, what is the purpose of heritage listing at all? If there is not a reasonable level of certainty about whether a place is heritage listed or not, the LEP heritage schedule must be considered of little value to owners and at unreliable to the point where it should not have status.

Randwick has undertaken numerous and comprehensive heritage studies. The IHO process as it is being implemented, we suggest undermines the sound heritage base of Randwick and places at risk the properly assessed and listed places.

Even if a place of some heritage value has been overlooked in a study process, if the LEP listings cannot be relied on at the point of lodging an application, the Council has failed to act in accordance with the provisions of its LEP and it must be assumed that any property is capable of heritage listing outside the usual LEP review process.

39 Dudley Street is not a heritage item, is not within or near a heritage precinct, does not reach the threshold for heritage listing as an item when compared with heritage listed buildings from the same period in the suburb, is in a noticeable location where it cannot be argued that it has been overlooked in earlier studies and does not have the significance or history that council attribute to it. Council has determined that there are heritage sites in other streets in the vicinity so there has been a professional review of the area in the past.

If this building were to be heritage listed as a result of this process, I would suggest there would be hundreds of similar unlisted buildings that then must be immediately heritage listed simply on the basis of fairness and the listing threshold that has been established. The random listing of a typical and non-distinctive building undermines the credibility and process of listing in the Council area.



Perhaps the difficulty of this site is that it is an attractive interwar period house that was not significant enough to heritage list but when threatened with removal upsets the local community as they do not wish to see change or a new development.

Council should, if they wish to lower the threshold for heritage listing, review the former studies and add a wide range of buildings to the heritage lists. I would suggest this could extend into many hundreds of buildings. However, if the intent of heritage listing is to retain significant buildings and precincts based on the established thresholds and criteria, the IHO fails.

The heritage study in support of the IHO does not stand up to scrutiny and if this is the basis of the listing it should not proceed.

The conclusion from the study appears to be that every typical bungalow in Sydney should be individually listed. This requires a more comprehensive philosophical debate before these dwellings are listed.

For a study of this kind it should be assumed that the study would be wider and provide a more comparative analysis of the Municipality and even further. There has been a review of interwar houses over Sydney and the dwelling at 39 Dudley Street certainly does not reach the threshold for individual significance and is not in a cohesive area that warrants a contributory status. Two adjoining typical dwellings does not make a conservation area. The dwelling at 41 appears to have some unusual interiors, based on interior photos, and it may have to be individually assessed in more detail however the interiors at 39 do not reach the threshold.

There is no acknowledged author of the study.

## Conclusion

I support the following conclusion of the John Oultram Heritage Assessment.

- 39 Dudley Street is a modest and typical example of a builder built, Californian style bungalow
- The property does not meet the Heritage Manual criteria for identification as a place of local significance

A handwritten signature in black ink, appearing to read "Stephen Davies".

Stephen Davies  
Director

07/02/2019



# STEPHEN DAVIES

DIRECTOR HERITAGE

## SERVICE

Heritage

## SECTORS

Commercial  
Government  
Health and Aged Care  
Residential  
Retail

## QUALIFICATIONS

Dip. Cons. Studies, York University, UK Institute of Advanced Architectural Studies

Dip. T&CP, University of Sydney

Accredited Environmental Mediation

## AFFILIATIONS

Chair – Heritage Council NSW (2016 – current)

Member – ICOMOS

Affiliate Member – RAI. (2004)

Member – SEPP 65 Randwick/Waverley Design Review Panel (2004–2006)

Member – NSW Government Sydney Harbour Reference Group (1998–2000)

Councillor – Woollahra Municipal Council (1995–1999)

Stephen Davies is one of the country's most experienced and respected heritage consultants. He is Chair of the NSW Heritage Council, and a skilled negotiator who has a keen understanding of the political and administrative processes surrounding heritage matters.

Stephen joined Urbis in 2007 and is the foundation of our heritage consultancy. He leads a team that provide independent development and conservation advice as part of Urbis' preparation of conservation management plans, heritage impact statements and demolition reports.

Stephen is particularly proud of his work resolving the heritage issues for One Central Park in Sydney's Chippendale, and for Quay Quarter Sydney. He is an accredited environmental mediator and a member of the International Council on Monuments and Sites. He has also been an expert member of many government committees and boards.

## PROJECTS

Quay Quarter Sydney (2012–Present)

Government Property NSW, various sites (2013–Present)

Varroville Estate (2013–Present)

Ascham School Adaptive Reuse, Darling Point (2010–14)

Centennial Park Cottages (2014)

St Vincent's Private Hospital, Darlinghurst (2012)

Paragon Hotel, Circular Quay (2010–12)

## CONTACT

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