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6 March 2023

Woollahra Environmental Planning Committee
 Woollahra Council
 536 New South Head Road
 Double Bay NSW 2028

via email: records@woollahra.nsw.gov.au

REFERENCE: SC7214

Dear Panel Members,

LATE CORRO	Item: <u>R2</u>
Previously forwarded to Cirs <u>✓</u> / N	
Meeting:	<u>EP</u>
Date:	<u>6 / 3 / 2023</u>

HERITAGE RESPONSE—Former Vacluse Uniting Church

Touring the Past Pty Ltd (TTP) was engaged by the property owners of 3 Russell Street, Vacluse, referred to as the *Former Vacluse Uniting Church*, to undertake an independent expert peer review of Woollahra Council's proposed listing of the subject place as a local heritage item as part of the *Places of Worship Heritage Study*.

To this end, a *Heritage Assessment* report dated 28 October 2022 was prepared by TTP and submitted to the council.

This response was also submitted to the Woollahra Local Planning Panel (12 December 2022). To date, no substantive response from the council's heritage specialists to the view and/or recommendations raised by TTP in regard to the heritage listing of the subject place appear to have been provided.

Briefly, I note that the agenda documentation [for the WLPP] refers to the TTP *Heritage Assessment* as prepared by a 'representative of the owner' (p17). This categorisation of my

involvement is misleading. I am an independent heritage practitioner who the property owner has engaged to undertake an autonomous review of the council's proposal. The report prepared by TTP, as stated in the methodology, was done according to the *Expert Witness Code of Conduct* in Schedule 7 of the Uniform Civil Procedure Rules 2005 (NSW). It articulates my professional opinion on the heritage significance of the subject place, focusing on the assessment provided in the *Places of Worship Heritage Study* and is not an advocacy/representation document. Such a distinction is essential to recognise.

In summary, my position is somewhat aligned with that of the council, although it differs on key points. I concur that the A-frame Church (1960) at the front of the subject place warrants heritage listing; however, I hold a different view as to the heritage value of its interior and moveable elements. I also disagree with the council's claim that the A-frame Church should be considered aesthetically and socially significant.

The major point of contention between the council and my assessment is the relative significance of the Federation-period church building (1909) at the rear of the subject place. It is my position that this building does not warrant heritage listing.

The council has amended the proposed heritage inventory sheet for the subject place in response to the findings and recommendations of the TTP *Heritage Assessment* report. Such revisions chiefly consist of fixing minor errors and reproducing large sections of the place history and discussion about the A-frame Church typology (without attribution), and the integration of some additional physical analysis from the TTP report. Additional discussion and clarification have also been introduced into the proposed Statement of Significance by the council. Some of the TTP report's recommendations concerning management were also adopted. These revisions have generally augmented the inventory sheeting as a heritage management document.

Nonetheless, differences in expert opinion remain on several fronts, as is typical with heritage significance assessment matters.

The council's contention with the findings and recommendations of the TTP *Heritage Assessment* and my counter-response is outlined in the following table.

NB. The council officer's response (central column) has been reproduced without change; however, their summarisation of the TTP Heritage Assessment findings/recommendations, where arbitrary, has been reworked. The order in which the council raised issues has also been revised for clarity.

TTP Position

Significance of the Rear Church Building

The TTP report agreed with the council that the 1909 church at the rear of the subject place (referred to as the 'old' church') did not embody aesthetic or representative significance, as ecclesiastical buildings generally do at the local level.

However, the TTP report differed from the council's claim that the 'old' church satisfied the minimum requisite threshold for listing Criterion A (Historical) and Criterion D (social).

It is generally accepted that significance is embodied by extant fabric.

The 'old' church has been irrevocably and substantially modified by the effective removal of its façade, which occurred as part of the A-frame Church's development. The loss of its façade has severely compromised the 'old' church's capacity to be interpreted to its original design and character.

Recognising the impaired integrity and low level of intactness of the 'old' church as a Gothic-style Federation-period ecclesiastical design markedly diminishes the potential to ascribe it with historical significance (or any heritage value/s).

The explanation in the draft heritage inventory sheet for why the 'old' church had historical significance was generally lacking. Resting on an inconclusive and ambiguous attestation that it 'demonstrate[s] the pattern of growth of religious

Council's Response

The former 1909 church has significance as part of the overall site and the heritage inventory statement reflects this. To reach the threshold only one criterion has to be met. The former 1901 [1909] church has historical and social significance.

TTP Response

The council's assessment has confounded general historical interest, which the 'old' church undoubtedly comprises as a now peculiar and defaced 'back of site' building with historical significance under Criterion A. The bar for meeting the latter at the individual heritage level is high and should be demonstrated compellingly within the local thematic context, not generically.

The crux of the council's position is that the sequence of development at the place is expressed in built form, with an earlier Federation church at the rear and a postwar church at the front. This evolved sequencing is of dubious interpretive/historical value. That such a development, which by any design measure resulted in a poor visual and functional outcome for the place, is also not acknowledged.

In my opinion, the council's slightly revised claim under Criteria A for the 'old' church remains unconvincing. Further, the TTP assessment did not unearth other more provable/demonstratable historically significant attributes. The fact that there are three other far more intact Federation-period places of worship in the municipality and that the presence of the Congregational/Uniting Church in Woollahra will be reflected in the A-frame Church at the subject place, undercut other arguments for ascribing historical or thematic value to the 'old' church.

It remains my view that any building that has had its façade elevation purposefully removed (not modified, but extinguished) would be a weak candidate for heritage listing unless perhaps it was singular or of outstanding significance in another regard. The loss of the 'old' church's most architecturally accomplished elevation should prove decisive for the finding that it is not of sufficient heritage value for listing at the individual level.

and community organisations that were occurring in this part of Sydney at the time'. Such a sweeping declaration is generic and does not withstand scrutiny (refer to TTP report, section 4.4).

Troublingly, from a methodological viewpoint, the council assessment does not undertake a comparative analysis of other Federation-period churches in the municipality (only postwar churches). The TTP report undertook a brief examination of comparators in Woollahra, noting three: one current (*Rose Bay Uniting Church*, 1683, WLEP) and two proposed in the Study at hand (*Paddington Church of Christ* and *St Andrews Scots Presbyterian Church*).

All three of these Federation-period church buildings are substantively more intact than the 'old' church at the subject place and, as such, far more architecturally distinguished.

Council, in this case, has failed to demonstrate that the 'old' church building is of social significance (refer to TTP report, section 4.4).

The TTP report acknowledged that 'some fine architectural elements' were retained at the 'old' church. Specifically, its coloured glazing, copper belle-cote, leadlighting/coloured glazing, and Pixie O'Harris murals.

Whilst it is noted that the submission is recommending that the 'old' church building is not included as part of the listing, contradictory information contained in the submission highlights that it contains elements of significance. Accordingly, Council staff retain the recommendation that the local heritage listing includes the 'old' 1909 church.

It is also noted that both side brick volumes at the 'old' church are non-original.

Under the *Assessing Heritage Significance* (2001) guidelines, grounds for exclusion include major alterations. It is not at question that the 'old' church building has experienced extensive change.

As examined further below, the attribution of social significance to the 'old' church remains flawed and erroneous.

The comment from the council that 'only one criterion has to be met' is concerning as it suggests a scattergun approach to significance assessment. In my opinion, the broader, more salient question is whether or not the 'old' church should be managed as a significant building from a heritage perspective into perpetuity, given that its original presentation to the public realm of Woollahra has been spoiled and there are better local examples existing that convey the same or similar historical themes (Federation religious design, Congregation/Uniting Church development/presence).

The TTP report is not contradictory in my mind.

The council's officer has not understood the key point advanced in relation to the significance of the 'old' church.

Namely, that while some architectural elements of note survive on the roof, side elevations, and internally, these attributes do not discount the building having been fundamentally altered.

An element can be of architectural interest or attractive without being of heritage significance.

TTP Position

Significance of the A-Frame Church

The TPP report found the postwar A-Frame Church has significance under criterion A (historical), criterion F (rarity), and criterion G (representativeness).

It differed from the council's assessment that the A-Frame Church was also of significance under criterion C (aesthetic) or criterion D (social).

Council's Response

The Heritage Study used the Heritage Manual criteria and found that the church meets both the aesthetic and social significance criteria as summarised below:

Aesthetic significance:
The A-frame church building is a restrained late twentieth century ecclesiastical building. The building has been subject to few alterations and additions since its construction. A-frame churches were designed and built for their striking spatial qualities, and the building is considered to be aesthetically distinctive.

Social significance:
Although social significance was not formally studied for this

TTP Response

In regard to the Pixie O'Harris murals, which are much discussed in the council assessment, it remains my view that:

As the Inventory Sheet acknowledges that the 'old' church building would not meet the threshold for listings under aesthetic or representative significance due to its compromised exterior, it is unbalanced to then suggest—through discussion in the description of the Inventory Sheet—that aspects of its interior are nonetheless significant. (pp30-31)

There is agreement between the parties that the A-frame Church is significant at the local level and highly intact.

Accepting that, the contentions here are not substantial and are advanced chiefly by TTP on the grounds of accuracy.

Fundamentally, it is not good heritage assessment practice to ascribe *both* aesthetic and representative significance to the same building.

It is illogical, in my opinion.

A building should either be considered aesthetically distinctive/distinguished/out of the ordinary or be perceived as a good and indicative example of its typology.

The assessment of the TTP report on this front stand:

It is accepted that no weight should be given to the design of the A-frame church by the practice Booker & Wilson. Other than being an active firm in NSW during the postwar period, no evidence has emerged to substantiate this firm as noteworthy, celebrated, innovative, etc. The involvement of

TTP Position

Council's Response

assessment, it is noted Vaucluse Uniting Church likely has social significance as a centre of worship for the local community for more than a century. The Vaucluse Uniting Church is a place of community memory. The A-frame church building on the site contains memorials and plaques to commemorate individuals associated with the church over time.

Notwithstanding, to qualify for local heritage listing in accordance with the guidelines, the building is only required to meet one of the criteria.

TTP Response

professional architects at the A-frame church has resulted in a good, functional design that conforms with the principal characteristics of the typology. All points that would be a better fit under criterion G.

The A-frame church is professed to have aesthetic significance by virtue of its 'striking spatial qualities' under discussion for criterion C; however, there is no elucidation of this criterion in the Statement of Significance, which emphasises the building's representative value—a point agreed with by this report (see below).

In the opinion of this report, the A-frame Church does not embody aesthetic significance. Its spatial qualities, while eye-catching as intended by the typology, are exceedingly typical for its type, particularly by 1960, and stem entirely from the architect's rendition of a well-established postwar modernist design form. This is not an example of the A-frame church at its postwar finest. The design language is conventional for the type. (p28)

The issue of social significance is examined below.

Social Significance

The subject place is not socially significant under criterion D.

As above.

Neither the 'old' church building nor the A-frame Church should be attributed with social significance.

The council admits that no quantitative or qualitative efforts to measure potential social significance were engaged as part of the Study. Such a failure to seek to move beyond the speculative assignment of social significance to a church building/s may have been understandable several years back

TTP Position

Council's Response

TTP Response

when the concept of social significance was being advanced, but it is now—in my view—undefensible.

At the core of detailing social significance is defining a community. Council determines the group to be the 'local community'. Such a grouping is far too nebulous and variegated to be accepted. For instance, it imaginably includes those whose personal beliefs diverge widely from those of the Congregational/Uniting Church.

Crucially, the council assessment has also fundamentally misconstrued the nature of social significance, which is a 'living' form of heritage value.

For example, this could likely be demonstrated by the parishioners of a church through their regular interactions with the place over a long period.

The above situation is not viable for the subject place as the congregation has dispersed and neither church building is being (or projected to be) utilised for the original use.

What the council are describing under criterion D is a historic community connection—not an enduring/ongoing link with a definable community group. Such claims would be a better fit for the A-frame Church under criterion A.

Again, the compromised intactness/integrity of the 'old' church diminishes its capacity to be attributed with historical significance as a former site of worship should the council follow my recommendation.

It remains my recommendation that neither church building at the subject place should be considered socially significant under criterion D.

TTP Position

Internal Controls—A-frame Church

No assessment (as opposed to a description) was provided in the Draft Heritage Inventory for why the layout of the A-frame Church and original internal elements were considered significant. Other than an inference that if a component was original, it was—without explanation—of heritage value.

The TPP *Heritage Assessment* found that some internal elements at the A-frame Church were significant on the grounds of their aesthetic distinctiveness and importance to the interpretability and intactness/integrity of the subject place, namely:

- Vestibule,
- Laminated timber beams and ceiling (nave),
- Central uninterrupted and soaring volume of the nave,
- All embedded plaques/memorials, and
- The attached metal crucifix (altar).

The TTP report recommended that these specific internal elements be noted as significant in the Statement of Significance and inventory sheet. Being explicit about what aspects of the interior require consideration from a heritage perspective provides far greater management clarity than 'blanket' coverage—both for the property owner and consent authority.

Council's Response

Including all interiors allows the protection of the entire interior of the church which is deemed to be significant as per Council's heritage study. This is an appropriate and robust approach to heritage conservation in accordance with the Burra Charter.

TTP Response

The *Burra Charter* encourages the adoption of an informed approach to heritage management. At its essence, it advocates for understanding the significance of a place and its various attributes. Such a comprehension of heritage value/s should then influence proposals for change.

Accepting that, only the significant elements of the A-frame Church's interior require management on heritage grounds.

The council's revised inventory sheet sheds no further light onto why the interior of the A-frame Church, in its entirety, is of paramount importance to the significance of the place.

NSW local councils have, over the past few years, increasingly sought to extend the reach of heritage management within the interior of heritage places. Such a shift in practice is not unwelcome.

However, the tendency has been to generically 'list' all aspects of the original interior without exercising discretion or undertaking a rigorous heritage assessment. Such an approach is unsystematic and burdensome in the context of planning for and the assessment of future change.

It is generally accepted that original fabric does not in itself spontaneously equate with cultural significance. An assessment has to be made and an evidenced case made.

The 'blanket' listing approach is also not the only available for the consent authority. The government practice note in Victoria, for instance, in regard to applying internal controls at the local level, states:

TTP Position

Council's Response

TTP Response

Extent of the Heritage Listing

The TTP report recommended that:

Optimally, the extent of the heritage listing would only be applied to the footprint of the A-frame Church and the frontage of the subject property, excluding the rear half of the place, which contains the flat-roofed link and 'old' modified church... In lieu of the above option, it is recommended that should the subject place be listed, its item name be altered to reflect what about the site is of significance; i.e. the Former Vacluse Uniting A-frame Church, including specific internal elements. This name, in combination with the proposed Statement of Significance, would better reflect what the significant elements at the subject place, yielding better management clarity for the property owner and consent authority.

It is agreed that the flat-roofed link is not significant. However, the former 1901 [1909] church was found to reach the threshold for heritage significance as per the Heritage Study.

Heritage Management Documents would provide further guidance on the management of all the buildings with significance on the site.

This provision should be applied sparingly and on a selective basis to special interiors of high significance. The statement of significance for the heritage place should explain what is significant about the interior and why it is important.¹

The TTP finding is in line with this approach. Only elements of demonstrated significance in the interior of the A-frame Church require heritage management. These more notable elements should be clearly outlined in the Statement of Significance and inventory sheet.

For the reasons discussed above, it is the findings of the TTP report that 'old' church building (1909) is not of sufficient historical significance to warrant its heritage listing nor patently of any social heritage value.

It is recommended that the Statement of Significance and the inventory sheet be revised accordingly to reflect this position.

It would be desirable then to exclude the rear 'old' church, effectively the back half of the subject place, from the extent of the heritage curtilage for the A-frame Church, which is deserving.

If that is not possible for mapping reasons, then it the imperative to amend the inventory sheet accordingly to reflect what is and what is not significant.

¹ Victoria Government Environment, Land, Water and Planning, *Applying the Heritage Overlay: Planning Practice Note 1*, August 2018, p4, available online

TTP Position

The TTP report noted that should the WLPP disagree with its findings and decide to include the 'old' church building as a significant part of the subject place; then it should be acknowledged in the inventory sheet that this heavily modified building is of less significance.

Moveable Heritage Items

The TTP report recommends that references to moveable heritage items be deleted from the Statement of Significance and the inventory sheet.

No explanation for why moveable elements identified by the council at the A-frame Church are significant has been offered other than that they may be original.

None of the moveable items at the A-frame Church are significant in my view—i.e., the overall heritage value of this former place of worship would not be adversely impacted should some of its furnishings depart.

The preparation of a moveable heritage inventory, as proposed in the management recommendations of the heritage inventory, is burdensome on the owner and, in the absence of persuasive reasoning why, presents as unnecessary.

Council's Response

As above.

Not responded to by the council.

TTP Response

This TTP recommendation deserves further elaboration.

It is my view that should the WLPP disagree with my findings that the 'old' church building is not significant, then the council's proposed Statement of Significance and inventory sheet should be revised to reflect better what fabric and/or attributes of the modified building are significant. Not just physically extant but significant under the claimed criteria.

The assessment/recommendations of the TTP report stand.

It is noted that the council has included information about the organ located in the upper galley in the inventory sheet without providing an indication of its significance.

As noted in the TTP report, this organ was relocated in 1933 and is not intact. It is my opinion that the organ is not significant. The inventory sheet should be revised to make this clear or explicitly discuss what about the organ is considered to be significant.

Measures undertaken to recognise and protect places of cultural heritage value in Woollahra are to be encouraged, as the conservation of important sites is integral for a community's sense of continuity and ability to interpret its multilayered evolution and distinctiveness. However, such measures should be based on *demonstrated* significance, which is only ascertainable from a rigorous analysis of a place from a heritage perspective. In the absence of this, the council runs the risk of adding places of little apparent significance and, counterproductive to the legitimate intent, diminish the value of heritage items in the eyes of the community.

The A-frame Church and some of its internal elements are of demonstrated heritage significance. The 'old' church at the rear of the subject place is not and should not be heritage listed. Despite the minor amendments to the council's proposed Statement of Significance, the version I prepared in the TTP report remains, in my view, a more accurate and actionable articulation of significance at the subject place. I recommend that the WLPP consider its adoption or encourage the council to consult with TTP to develop a mutually agreed-upon Statement of Significance.

The Former Vacluse Uniting A-frame Church, constructed in 1960, is of historical and representative significance. The building was designed by the architectural practice Booker & Wilson, who adopted the then tried-and-true postwar A-frame form. Elements of particular significance are its steeply-pitched triangular form, concrete roof tiles, salmon brick walls, original openings, including unpainted aluminium frames and frosted/coloured glazing, façade composition, and rendered entrance porch with original doors and terrazzo threshold. The significant internal elements are the vestibule, laminated timber beams and ceiling treatment in the nave (battened textured sheeting), along with its central uninterrupted and soaring volume and large attached metal crucifix, the upper gallery, and all embedded/affixed plaques and memorials. The front garden retaining walls/fence and central path are original and complementary to the A-frame Church.

The Former Vacluse A-frame Church is historically significant as an illustration of postwar church-building activity in the municipality by the Congregationalists, later the Uniting Church (from 1977), who had worshipped at the place since 1909.

The A-frame Church is of representative significance as an intact and substantial masonry example of its typology, which surged in international popularity over the 1950s as a cost-effective and flexible solution for postwar ecclesiastical design. Its bold triangular geometry and pared-back character are evocative of modernist architecture. While more traditional symbolic allusions to church design, like the building's verticality, simplified metal crucifixes, and entrance porch, are well-integrated and impart a sense of repose and reverence. It is the singular example of its type in the municipality.

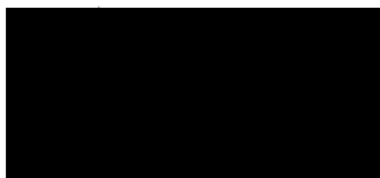
Some internal elements, as specified, are architecturally notable and contribute to the intactness and interpretability of the former worship space as well as the church's original design.

[Either provide in Statement of Significance or include in the Heritage Inventory Sheet]

The modified late Federation Gothic-style church (1909) at the rear of the property, which initially accommodated the Congregationalist, has been severely modified and is not significant. The flat-roofed link between the A-frame and rear churches is also not significant.

Please do not hesitate to contact the undersigned if you have any questions on this matter.

Yours faithfully,



PATRICK WILSON
 Director
 Touring the Past Pty Ltd
 B.A (Hist Hons), M. Cult Heritage
 ICOMOS, Pro Hist PHA (NSW & ACT + VIC),
 SAHANZ, APT, IAIA, Interps Aus, Nat Trust (NSW)



Carolyn Nurmi

From: Ed Vesely [REDACTED]
Sent: Friday, 3 March 2023 12:02 PM
To: Kristy Wellfare
Subject: REPRESENTATIONS MADE ON BEHALF OF SYDNEY CHEVRA KADISHA REGARDING TO THE COUNCIL'S HERITAGE REPORT RELATING TO 172-178 OXFORD STREET, WOOLLAHRA
Attachments: 172-178 Oxford Street Woollahra_Response to Heritage Listing.pdf

Dear Kristy,

Thank you for your email below. Although we will not be attending the Environmental Planning Committee meeting on Monday, 6th instant, we do wish to bring to the Committee's attention the representations made on our client's behalf by Urbis Heritage Consultants in their letter to you of the 10th November 2022, a copy of which is attached.

Would you please keep us informed of further developments.

Yours Faithfully

Ed Vesely
for: **REID & VESELY**

Reid & Vesely Solicitors
Level 2, 35 Spring Street
BONDI JUNCTION NSW 2022
Tel: (02) 9280 0000
Fax: (02) [REDACTED]

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From: Kristy Wellfare <Kristy.Welfare@woollahra.nsw.gov.au>
Sent: Thursday, March 2, 2023 2:14 PM
To: Kristy Wellfare <Kristy.Welfare@woollahra.nsw.gov.au>
Subject: Notification of Environmental Planning Committee meeting of 6 March 2023 - Heritage Study: Places of Worship

Good Afternoon,

I write to advise you that the Woollahra Environmental Planning Committee, starting at **6.30pm on Monday 6 March 2023**, will consider a report on the planning proposal (including the advice of the Woollahra Local Planning Panel) to list the following sites as local heritage items in Schedule 5 and on the Heritage map of the *Woollahra Local Environmental Plan 2014* (Woollahra LEP 2014):

- *Paddington Church of Christ complex and setting, including interiors and moveable heritage at 116-122 Paddington Street, Paddington (Lots 20, 21, 22, Sec 1, DP 180)*

LATE CORRO	Item: <u>R2</u>
Previously forwarded to Cirs Y / N	
Meeting: <u>EP</u>	
Date: <u>6 / 3 / 2023</u>	

- *St Andrews Scots Presbyterian Church complex and setting, including interiors and moveable heritage at 2 Carlisle Street, Rose Bay (Lot 1, DP 724928 & Lot 1, DP 966535)*
- *St George Greek Orthodox Church and War Memorial complex and setting, including interiors and moveable heritage at 90-92 Newcastle Street, Rose Bay (Lots 15 & 16, Sec D, DP 5092)*
- *Sydney Chevra Kadisha, including interiors and moveable heritage at 172-178 Oxford Street, Woollahra (Lot 1, DP 85862)*
- *Vaucluse Uniting Church complex and setting – former 1909 Vaucluse Congregational Church building and former 1960 A-frame church building, including interiors and moveable heritage at 3 Russell Street, Vaucluse (Lot 7, Sec 5, DP 4400)*

The Panel has also provided advice regarding the proposed nomination to the State Heritage Register (SHR) of the *Sydney Chevra Kadisha, including interiors and moveable heritage at 172-178 Oxford Street, Woollahra (Lot 1, DP 85862)*.

Woollahra Council will be holding this Committee meeting as a **hybrid meeting** to be held on site and also accessible using online **conferencing technology**.

The meeting will take place in the Thornton Room at Council Chambers - 536 New South Head Road, Double Bay.

Members of the public and government agencies are invited to watch the meeting live (either in person or via Council's website) and/or register to address the Committee.

- **To register to address the meeting (register by 12 noon, Monday 6 March 2023)**
 - Email your name, mobile number and the item you are interested in to records@woollahra.nsw.gov.au
 - Once registered, we will provide you with a link, phone number and code to enable you to join the meeting via telephone or online. This will be emailed to you on the day of the meeting.
 - There is a limit of three minutes per speaker and each speaker must register individually.
- **To submit late written correspondence (submit by 12 noon, Monday 6 March 2023)**
 - Email your written correspondence to records@woollahra.nsw.gov.au and include reference **SC7214**.
- **To watch the meeting live (from 6.30pm)**
 - Watch the meeting live via the link which will be available from the [Environmental Planning Committee Agendas, Audio Recordings and Minutes](#) page on Council's website.

The Committee's Agenda, including reports and associated annexures, will be available on [Council's website](#) from 3.00pm on **Thursday 2 March 2023**.

An audio recording of the meeting will be available on Council's website by 5.00pm the day following the Committee meeting.

Please note, by addressing the Committee meeting, members of the public consent to their voice and personal information (including name and address) being recorded and publicly available on Council's website. Members of the public are advised that meeting are being lived streamed, accessible via a link from Council's website. Accordingly, please ensure your address to Council is respectful and that you use appropriate language and refrain from making any defamatory statements or discriminatory comments. Woollahra Council does not accept any liability for statements, comments or actions taken by individuals during a Council or Committee meeting.

For any technical assistance, please contact Council's governance team on (02) 9391 7001.



Kristy Welfare
Senior Strategic Heritage Officer

Woollahra Municipal Council
 536 New South Head Road, Double Bay NSW 2028

t: 02 9391 7925

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Our Values: Respect for People | Integrity and Excellent Performance | Professional Quality Service | Open Accountable Communication

We acknowledge the Gadigal and Birrabirragal people as the traditional custodians of the land in our local area.





**ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000**

URBIS.COM.AU
Urbis Pty Ltd
ABN 50 105 256 228

10 November 2022

Shona Lindsay
Woollahra Council
536 New South Head Road
Double Bay NSW 2028

Dear Shona,

RESPONSE TO PROPOSED HERITAGE LISTING OF 172-178 OXFORD STREET, WOOLLAHRA, SYDNEY CHEVRA KADISHA

INTRODUCTION AND BACKGROUND

Urbis have been engaged by Reid & Vesley to prepare the following response to the proposed heritage listing of the site owned by Sydney Chevra Kadisha, 172-178 Oxford Street Woollahra (herein referred to as the subject site).

Urbis was engaged by the owners of the subject site in 2014 and 2018 for works approved to the site including (but not limited to) the demolition of the western wing and the construction of new office spaces. These works were approved under Development Application (DA) 541/2014. Urbis prepared the Heritage Impact Statement (HIS) that accompanied the original DA in addition to a number of HISs for additional Modifications in 2018. Urbis is therefore familiar with the subject site.

In 2014, Urbis prepared a Heritage Assessment that also concluded that the subject site met the criteria for Heritage Listing and therefore, Urbis agrees with the proposed heritage listing in principle. However, we have prepared this letter to request that additional information and detail be included in the inventory sheet for the site. This additional information has been outlined below.

RESPONSE AND RECOMMENDATIONS TO PROPOSED INVENTORY SHEET

Urbis have reviewed the proposed inventory sheet for the subject site and agree with the proposed heritage listing for the site in principle, however this is contingent on the following comments and recommendations.

- While the Recommended Management does state, *Elements of high significance should be retained, maintained and conserved. Elements identified as intrusive should be removed when possible*, the inventory sheet does not go on to specify the gradings of significance across the site. Therefore, the Recommended Management should be updated to include a recommendation for a Conservation Management Plan (CMP), or Conservation Management Schedule (CMS) be prepared to clearly identify the gradings of significance across the site.



- In addition, as the western wing was constructed in c.1981 and has been approved for demolition. The inventory sheet should be clear that this structure is an item of neutral significance and therefore, future proposals (outside of the approved DA 541/2014) that may seek the demolition or alterations to this structure would be acceptable.
- In addition, the Recommended Management should be updated to acknowledge development potential to the western end of the site, as currently approved under DA 541/2014.
- The Recommended Management should be updated to clearly state the works currently approved to the site under DA 541/2014 are able to be undertaken regardless of the proposed heritage listing. While these works are acknowledged on the inventory sheet in "Modification and Dates", the Recommended Management should clarify that these works are expected to be undertaken.
- The Inventory sheet does not itemise all items of moveable heritage. Therefore, it is recommended that a Schedule of Significant Moveable Heritage is also included in the Recommended Management. This will ensure clarity on the items considered to contribute to the heritage significance of the site.
- State Heritage Listing should not be pursued until a more detailed heritage assessment of the building, including significance mapping and moveable heritage schedule has been completed.

CONCLUSION

In principle, Urbis agree with the proposed heritage listing on the site. However, the Inventory Sheet should be updated to ensure the significance of the elements and wings are clearly identified and the development potential of the site is acknowledged.

Please contact the undersigned with any questions regarding the information above.

Kind regards,



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