

Greenrock Property Pty Ltd

Dear Sirs

Peer Review of Heritage Assessment Report 7 Station Street West, Parramatta

As requested, we have carried out a Peer Review of the report *Heritage Assessment, 7 Station Street West, Parramatta,* August 2015, prepared by NBRS + Partners Heritage Consultants. In preparing this Peer Review, Graham Brooks has inspected the subject site and its streetscape and reviewed the *Heritage Assessment* in detail.

We understand that you will submit this Peer Review to Parramatta Council, with other relevant documentation, at the appropriate time.

Background

The *Heritage Assessment* has been prepared in the context of a future application for the demolition of the subject historic house as part of a redevelopment proposal for the subject and adjoining sites.

Review of Report Methodology

The *Heritage Assessment* report adopted a best conservation management practice approach to its task, researching and reviewing the historical development of the site, the original construction date of the subject house and by comparing the physical evidence, identified subsequent alterations to establish its nature, associations, condition and integrity. The report therefore has established a thorough understanding of the heritage significance of the place.

The Heritage Assessment then set itself two tasks:

- To review the information contained in the Council Heritage Inventory Form that informed the original heritage listing of the site.
- To undertake a new review of the significance of the subject site through the filter of the standard Heritage Council Criteria for Heritage Assessment, in order to test if the site and the house meet the thresholds for local heritage listing contained in that methodology.

It is this approach and its conclusions that will form the basis for this Peer Review.

Integrity of the Historic House

The *Heritage Assessment* reviewed the range of alterations and additions that have been made to the original house. It summarised these on P32.

- Reconstructed front verandah detailing and trims
- Possible addition of bracketed awning to projecting bay
- Modern finials, barges and ventilator details
- Extension of the original plan form to the rear
- Modification of the original roof form as a result of later additions
- Modification of side window size and joinery
- Replacement of original flooring
- Replacement of all internal doors
- Replacement of all ceilings, cornices and ceiling roses
- Painting of face brickwork
- Concreting of the rear yard
- Modification of front yard and front fencing
- Removal of original kitchen fireplace
- Loss of original residential context through redevelopment of surrounding sites

From a review of the analysis of the historical development of the building and a detailed site inspection, I concur with this summary and agree that the original integrity of the subject house has been severely compromised. In particular, the altered roof form with its different ridgeline, combined with the altered front verandah detailing, have changed the presentation of the house to the street. Many of these changes cannot be reversed due to their impact on, or loss of, original fabric. Other changes are unlikely to be reversed in the current socio-economic context of the area.

I also accept that the streetscape context of the house has changed radically over time, particularly with the erection of a series of mid 20th century residential flat buildings to the immediate north. These buildings are set well back from the street frontage in anticipation of a planned road widening that did not eventuate.

Heritage Inventory Statement of Significance

Information contained on the Heritage Inventory sheet for the subject property provides some background to the heritage listing process that resulted in the subject property being listed as a Local Heritage Item in Parramatta City Centre LEP 2007, where it is identified as Item 127.

- Identification of the site (as item 536) for its heritage values was first undertaken by Meredith Walker as part of the 1993 City of Parramatta Heritage Study. She utilised the standard heritage study guidelines then in practice.
- The property was first given statutory protection when it was included as a heritage item in Regional Environmental Plan 28 (Item No 536) in 1999.
- The Statement of Significance was last updated on 1st March 2002.
- The second round of analysis was undertaken by the National Trust (Parramatta Branch) in 2004, when a date for the construction of the residence (1915) was added to the inventory. The National Trust study did not follow any recognised guidelines.

Note that the standard Heritage Council Guidelines known as Assessing Heritage Significance, was first published in 2001.

The official Statement of Heritage Significance contained in the Heritage Inventory states:

House at 7 Station Street West is of significance for the local area for historical and representativeness reasons. Built c.1915, it is readily identifiable as part of historic building stock and is still contributing to the streetscape.

The Heritage Inventory sheet records the following assessment against the standard Heritage Assessment Criteria:

- Historic (Criterion A) This item is historically significant
- Representative (Criterion G) This item is representative

There is no further discussion or analysis in the Heritage Inventory to support these conclusions. The Statement of Significance appears to be suitable for an Heritage Inventory, on the assumption that it will subsequently be reviewed at the appropriate time, when a future development opportunity is being considered.

Note, the additional text quoted under the Statement of Significance on pp 3 of the *Heritage Assessment* report was in fact contained in the Physical Description section of the Heritage Inventory sheet for the property.

Upgraded Heritage Assessment against Criteria

Having reviewed this aspect of the analysis in the *Heritage Assessment*, I concur with the conclusion that the subject property does not meet any of the thresholds established by the Heritage Council for entry in a Local Environmental Plan Heritage Schedule.

Those criteria speak of "special", "important" and "significant". The current house has none of these threshold characteristics. In terms of the Heritage Inventory sheet analysis:

- There is nothing to establish that has made any important contribution to the historical course of pattern of the area's cultural history.
- Its degree of representativeness has been severely compromised by subsequent alterations.

Upgraded Assessment of Heritage Significance

The upgraded Assessment of Heritage Significance contained in the *Heritage Assessment* report is as follows:

No 7 Station Street West, Parramatta, is a modified early 20th century residence of a standard form that retains some characteristics of this transitional style of development which is relatively common in the Local Government area. The building has no historic evolutionary or associational values and represents typical residential development of the period in which it was built.

The changes to the building to convert it to commercial use have permanently altered its original appearance and form and have obscured original character and detail. In its current form it does not provide accurate evidence of the historic building stock in this area.

The setting of the building amongst later development does not provide support for the setting or contribution of this site to any significant streetscape in the vicinity of the site.

The site does not reach a reasonable threshold for individual heritage listing.

Demolition of the item will not result in any significant loss of cultural heritage to Harris Park, Parramatta City Centre or the wider Parramatta Local Government Area.

I concur with this upgraded Statement of Heritage Significance.

Conclusion Reached in the Heritage Assessment report

The conclusion reached by the Heritage Assessment report was as follows:

This heritage assessment suggests that the individual heritage listing of the property in Schedule 5 of the Parramatta City Centre LEP was not appropriate at the time of the original heritage study and cannot have included a rigorous assessment or analysis of the building fabric given its high degree of modification which is discernible on inspection without the benefit of documentation.

The very limited heritage value and substantially modified condition of the place suggests that its loss would not result in any substantial diminution of the environmental heritage of Parramatta. Demolition for a conforming development would in my opinion be acceptable in these circumstances.

Comment:

I concur with this conclusion. The Heritage Assessment has succeeded in its primary aims:

It has reviewed the information contained in the Council Heritage Inventory form and found that the depth of original research and analysis (1999) was inadequate as it did not recognise the influence of the many alterations that had taken place on the building in accordance with a 1989 development consent. It is apparent that, for whatever reason, the consultants did not identify the particular circumstances of this property and consider excluding it from their recommended list of potential heritage items for the eventual REP.

It is apparent that once on the REP heritage schedule that no subsequent heritage review has substantially reconsidered the integrity of the property and its continuing suitability for retention on the heritage schedules of successive planning instruments. In my experience it is highly unusual for broad coverage heritage reviews and surveys to delete properties that had been included in earlier listing schedules.

The 2002/2004 addition of comments against criteria A and G, do not in my opinion, reflect a substantial reconsideration.

The detailed analysis of the subject site against the Heritage Council Assessing Heritage criteria contained in the *Heritage Assessment* report rightly concludes that the subject property does not meet the thresholds for LEP listing that were introduced in 2001.

Recommendation

In light of the renewed analysis and conclusions of the Heritage Assessment report, I support its recommendation that, although the site has been heritage listed for some time, demolition of the house at 7 Station Street West, Parramatta is acceptable in the context of a future consent for the redevelopment of the subject site and potentially adjoining sites.

Yours faithfully
GRAHAM BROOKS AND ASSOCIATES

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