

## **ATTACHMENT G(7)**

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# **Response to Heritage Submissions**

City Plan Advice

10 August 2022

**David Ongkili**

Coordinator Strategic Planning  
Randwick City Council  
Administration Building & Customer Service Centre  
30 Frances Street  
RANDWICK NSW 2031  
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Dear David,

**INITIAL HERITAGE ADVICE  
RANDWICK HERITAGE REVIEW - LOCAL ENVIRONMENTAL PLAN HERITAGE SUBMISSIONS**

As discussed please find below our initial heritage advice based on the preliminary review of the Submissions made by the properties whose owners/consultants responded to the Heritage Planning Proposal Exhibition associated with the Planning proposal for heritage listing of several properties as part of the Randwick City Council's comprehensive review of the Randwick LEP 2012 around mid-2021 in order to implement the Randwick Local Strategic Planning Statement (Vision 2040) (LSPS) and give effect to the Eastern City District Plan.

Preliminary comments have also been provided to give basic understanding on the reasons for our recommendations following review of the submitted documentation. We will provide a more detailed responses to the submissions and amended State Heritage Inventory (SHI) forms in line with the below initial comments and heritage advice where applicable.

Address	Submission	Comments/Recommendation
21 Baden Street, Coogee	Objection to proposed listing	We still maintain our recommendation that the subject flat building has been modified significantly from its original form both externally and internally (being originally single-storey residence then converted into a flat building) and does not meet the threshold for heritage listing.  <b>REMOVE FROM THE POTENTIAL ITEMS LIST</b>
41 and 43 Kyogle Street, Maroubra	Objection to proposed listing	These semi-detached houses are one of very few remaining intact Post-War housing in the area. It is acknowledged that the area and streetscape of Kyogle Street has been changed and does not resemble a common characteristics as it was in the Inter-War and Post-War periods. This has removed the setting of the subject semi-detached houses. Although, the property is not considered an eye-sore in relation to heritage aspects and assessing significance criteria, its relatively a simple and unadorned example of its type especially considering the simplicity of the internal elements and

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		<p>finishes seen in the real estate images for 43 Kyogle Street. Based on further consideration and comparison of similar period of development in the area, which is largely developed in the Inter-War period, the heritage listing is not warranted.</p> <p><b>REMOVE FROM THE POTENTIAL ITEMS LIST</b></p>
<p>20 Marcel Avenue, Randwick</p>	<p>Objection to the extent of Moira Crescent HCA boundary.</p>	<p>The listing boundary for the Moira Crescent HCA was based on the four Bishop Estate Subdivisions between 1899 and 1927. We have retained the recommended extension by Extent on the northern side of Marcel Avenue and recommended inclusion of 11A Marcel Avenue on the southern side to capture the extent of the Fourth subdivision from the 1927. Looking at closely to the Forth subdivision plan it appears that number 20 and 22 are outside of the 1927 subdivision. I had to overlay the current HCA map with the 1927 subdivision plan to check the actual boundaries of the Forth subdivision and confirmed this (see attached overlay plan for your reference). This semi-detached houses may be excluded from the listing boundary.</p> <p><b>EXCLUDE NUMBERS 20 AND 22 MARCEL AVENUE FROM THE BOUNDARY EXTENSION OF THE MOIRA CRESCENT HCA. RETAIN ALL OTHER PROPERTIES WITHIN THE BOUNDARY EXTENSION.</b></p>
<p>237-245 Maroubra Road, Maroubra (Lot 3, Lot 6, Lot 12, Lot 13, Lot 14, Lot 15)</p>	<p>A number of owners objecting on the heritage listing</p>	<p>Our assessment based on the <i>Assessing Heritage Significance</i> criteria and heritage best practice. The historical background for the potential heritage items has been undertaken by a professional Historian with considerable experience in heritage field. Use of construction notices is a common historical material in order to establish the date of construction and obtain the name of the architect/builder if available. It is not common in Maroubra to find a flat building that has been designed by an Architect rather than a speculative builder. The building was designed by Mr. Cecil Reynolds Winter, who has been described as being a well-known architect of former years, and was responsible for the design of a number of suburban picture theatres (Attachment 6 of the Submission by Lung S Yeung &amp; L S Xie).</p> <p>It is difficult to understand how the building could be called by a registered architect as "...not qualified to be called a piece of architecture." The assessment undertaken in the submitted objection does not consider the Inclusion and Exclusion guidelines of the <i>Assessing Heritage Significance</i> of the NSW Heritage Manual and base most of its consideration/assessment on the building being a cheap block of flats catering for the low end market. This is not one of the considerations in the</p>

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		<p>significance assessment criteria. Not all of the heritage items have to be an architectural excellence or designed by an award winning architect. The changes to its window materials and roof tiles and repairs to face brick facades is the nature of old buildings' maintenance that would be expected over the years. The building still maintains its overall streetscape elevations similar to that of the sketch included the 1934 advertisement despite the changes noted in the submissions (Building and Construction, SMH, 23 October 1934, 6). The North Sydney Orpheum Theatre was demolished to make way for the new Warringah Expressway in late 1962. The Lindfield Theatre was largely destroyed by a fire in 1967 and later was demolished in 1969 and was replaced by the Coles supermarket at the corner of Balfour Street and Pacific Highway, which is now under redevelopment, too. Both of these theatres are noted within the documentary of theatres across Sydney suburbs. The Commercial Block at 1-21 Lindfield Avenue in Lindfield was designed by Cecil Reynold Winter in 1934 and is listed as a heritage item under Kuring-gai LEP 2015 (item no. I41). The design of the Commercial block is very similar to "Crossley Court" and has similar modifications to its windows and overall fabric. The Lindfield Masonic Hall has similar (but simpler) detailing to both the Lindfield Commercial Block and "Crossley Court" representing the signature detailing in the architecture of Winter during the Inter-War period.</p> <p>The financial hardship is a consideration for State heritage listing under the NSW <i>Heritage Act</i> due to its mandatory requirements for compliance with Minimum Standards of Maintenance &amp; Repair. This is not the case under the local heritage listing requirements.</p> <p><b>LIST ON PART 1 SCHEDULE 5 OF THE LEP</b> (shopfronts and below awning facades can be excluded from heritage listing, which can be made clear in the SHI form and Statement of Significance)</p>
Unknown Address (Submission by Helen Bekiaris)	Objection to her parents' property's nomination for heritage listing but does not include any address.	<b>N/A</b>
1 Belmore Road, Randwick	Objection to heritage listing	This property was not within the 57 potential items list we have considered and assessed/provided SHI forms in the 2022 peer review. However, an inspection and assessment of the property was undertaken as part of the 2015 Randwick Junction Heritage Conservation Area. Based on the SHI form prepared for the property

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		<p>at the time. The recommendations of the SHI form are still valid and warranted as copied below:</p> <p><i>It is recommended that only the above awning facade and awning are to be listed on Schedule 5 of the Randwick LEP 2012. It is further recommended that the upper level signage on the splayed corner be removed as it obscures much of the significant fabric.</i></p> <p><b>LIST ON PART 1 SCHEDULE 5 OF THE LEP</b></p>
36 Cottenham Avenue, Kensington	Objection to heritage listing	<p>The Weir Phillips objection assessment refers to Criterion B of the SHI form when considering discussion against Criterion A. The SHI form notes the following against Criterion A:</p> <p><i>Constructed in c.1919, the house is representative of urban subdivision and growth within the Kensington local area during the Inter-War years of the 20th century. The Inter-War house was one of the only seven houses on the west side of Cottenham Avenue.</i></p> <p>It is clear that the subject residence is one of the first seven houses built on the western side of Cottenham Avenue and remained largely intact externally. We can amend the SHI form to exclude areas of the interiors that have been modified accordingly.</p> <p><b>LIST ON PART 1 SCHEDULE 5 OF THE LEP</b></p>
11-13 Abbotford Street, Kensington	Objection to heritage listing	<p>We still hold the same opinion that the subject semi-detached Federation houses meet at least two of the Significance Assessment criteria (Criteria A and C) and therefore should be listed as a group heritage item on the LEP. We can amend the SHI form to include the additional historical and descriptive information provided in the submissions by Urbis and GBA Heritage, and exclude the modified parts of the interiors and later additions to the subject semis. The listing was recommended for both 11 and 13 Abbotford Street and not just for no.13 Abbotford Street.</p> <p>Council may wish to consider the recommendation made by GBA Heritage for North Kensington HCA study for a further protection in the locality.</p> <p><b>LIST ON PART 1 SCHEDULE 5 OF THE LEP</b></p>
37 Robey Street, Maroubra	Objecting to the heritage listing	<p>This property was not part of the CPH peer review items. Notwithstanding, I have checked the Google street view and real estate images of the property and note that it has been significantly modified both externally and internally with the face brick exteriors being rendered and painted and all interiors have been refurbished retaining very little Inter-War characteristics hence reducing the integrity of the building. It is noted that the</p>

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		<p>building is listed as a "late modern house' heritage item (item no. I228) while it is evident that it was built in the Inter-War period and was resembling the characteristics of an Inter-War bungalow up until its complete refurbishment and modification.</p> <p>It appears that all changes have been made between 2013 and 2015 (July 2014) as the earlier images show intact Inter-War detailing of the interiors and exterior. The changes in particular to the exterior finishes are irreversible.</p> <p><b>REMOVE FROM PART 1 OF SCHEDULE 5 OF THE LEP</b></p>
5 Severn Street, Randwick	Objection for heritage listing and requires clarification on the nature of the proposed listing whether as a heritage item or as an archaeological item?	<p>As assessed by City Plan Heritage the building does not meet the threshold for listing as a heritage item. We only identified likely potential for archaeological resource but this has further been considered in line with the additional archaeological assessments by Urbis and GML Heritage (during the proceedings of the Land &amp; Environment Court case while finalising the SOFAC, and following the preparation of the SHI form). It appears that the dairy that was noted being located within the subject site was, in fact, at a nearby site which has already a new development on it.</p> <p>Our previous assessment recommended the site to be considered for listing as an archaeological item under Part 3 of Schedule 5 of the Randwick LEP 2012, but it was evident from the additional archaeological studies provided following our assessment, the archaeological potential may not be to a level that would warrant listing of the site as an archaeological item. The only historical interest that would remain on the site is the sandstone boundary wall of which the Council may request to be retained as part of the proposed development. A condition for archaeological monitoring during the demolition of the existing building and excavation of the site can be made to ensure likely finds, if any, are documented appropriately by suitably qualified heritage professional.</p> <p><b>REMOVE FROM THE POTENTIAL ITEMS LIST</b></p>
26 Marcel Avenue, Randwick	Objecting to heritage listing	Enclosure of the front balconies/patios were apparent to us but this does not reduce the historical evidence and aesthetic integrity and quality of the subject flat building, which appears to retain most of its internal Inter-War detailing, too. Happy to undertake a site visit and discuss further with the Owners Corporation representative Terry Dwyer to further clarify the heritage listing criteria.

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		<b>LIST ON PART 1 SCHEDULE 5 OF THE LEP</b>
36, 38, 40 and 42 Cook Street, Randwick	Objecting to heritage listing and noting why number 34 Cook Street is not part of the listing nomination	<p>Federation period for architectural styles is considered to be between 1890 and 1915 while Victorian period is being between 1840 and 1890. Since the subject terraces were constructed c1893 they are considered to be Federation Filigree terraces. Our scope for the peer review was to review the nominated potential heritage items and not to add new nominations. Hence we have not reviewed no. 34 Cook Street, which is part of the same terrace group as seen in the 1943 aerial but was not part of the nomination. The reason for its exclusion is unknown as it appears relatively similar to that of nominated group.</p> <p>Having numerous terraces listed within the LGA or wider Sydney is not an exclusion criteria under the Significance Assessment criteria. As stated in the <i>Assessing Heritage Significance</i> publication of the NSW <i>Heritage Manual</i> "A heritage item is not to be excluded on the ground that items with similar characteristics have already been entered on a statutory list."</p> <p><b>LIST ON PART 1 SCHEDULE 5 OF THE LEP</b></p>
3 Bishops Avenue, Randwick	Objection to heritage listing	<p>Based on the information provided within the submission by Zoltan Kovacs, it is evident that the external façade visible from the public domain of the house is not original. Although the original 1890's villa, which is constructed at the beginning of the Federation period, is encompassed within the current building envelope and detailing, the conjecture balconies and façade confuses the building's origins and integrity hence the evaluation in the SHI form. It does not meet the threshold for heritage listing in this case.</p> <p><b>REMOVE FROM THE POTENTIAL ITEMS LIST</b></p>
24 Eastern Avenue, Kensington	Objection to heritage listing	<p>The assessment of 24 Eastern Avenue in Kensington was based on the historical research undertaken by a Professional Historian with considerable experience in heritage field who has established that the property was noted as being called 'Floret' on the Sands Directory and may not be registered under this name on the Certificate of Title. Association with Price Family is secondary to its primary historical significance under Criterion A. The property meets the threshold under at least three criteria (A, C and G) for nomination of heritage listing.</p> <p><b>LIST ON PART 1 SCHEDULE 5 OF THE LEP</b></p>
69 Darley Road, Randwick	Request to amend parts of the SHI	The submission suggests that the SHI form was prepared without a site inspection and based on

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	form to reflect the current condition of the property. Object for listing.	<p>desktop study only. As previously noted to the Council, all 57 nominated properties and the Moira Crescent HCA properties were inspected by me on foot from the public domain. Due to the landscaping visibility of the subject house was limited but I could see most of the front elevation and the front garden to a level that I could form a view on its integrity and the Federation Queen Anne style detailing.</p> <p>I have reviewed the submission and the Heritage Impact Statement by Zoltan Kovacs, which confirms the house being "... one of the earliest surviving examples of residential construction in the immediate locality."</p> <p>Based on our previous assessment and historical research as well as the additional information provided, it is evident that 69 Darley Road In Randwick meets the threshold for heritage listing. As noted in other cases condition of fabric is not a consideration under the Significance Assessment Criteria. We acknowledge the information and request for modifications to the SHI form by the owners and will amend the descriptions in the SHI form accordingly where applicable/agreed and include additional physical description from the HIS. The only conflict we have is the date of construction of which our Historian found the house built in 1907 as it was noted on the Sands Directory but the HIS refers to it 1910 construction and most of its aesthetic significance assessment based on this.</p> <p><b>LIST ON PART 1 SCHEDULE 5 OF THE LEP</b></p>
9 Carlton Street, Kensington (Request to List)	Request for inclusion in heritage listing	<p>Following the brief review of the property and SIX maps 1943 aerial it is clear that the house at 9 Carlton Street is one of few intact remaining two-storey houses dating from the early 20th century in the area. It appears that originally was painted brick on the first floor and side elevations, which the paint finish has recently been removed. The property has potential to meet the threshold for heritage listing.</p> <p><b>FURTHER ASSESSMENT AND INSPECTION IS REQUIRED TO PREPARE THE SHI FORM FOR ITS HERITAGE LISTING NOMINATION</b></p>
1 Berwick Street, Coogee (Request to List)	Request for inclusion in heritage listing	<p>The information and documentary evidence submitted suggests that the subject properties will meet the threshold for heritage listing.</p> <p>The submission makes note of an Urbis report, which would need to be provided for a further consideration during the detailed assessment and preparation of the SHI form.</p>



Address	Submission	Comments/Recommendation
		<b>POTENTIAL FOR LISTING ON PART 1 SCHEDULE 5 OF THE LEP</b>

I trust the above initial heritage advice will assist the Randwick City Council on its finalisation of the heritage listing nominations. As discussed, further detailed responses will be provided in due course. Please do not hesitate to let me know if you have any questions on the above comments and advice.

Yours sincerely,

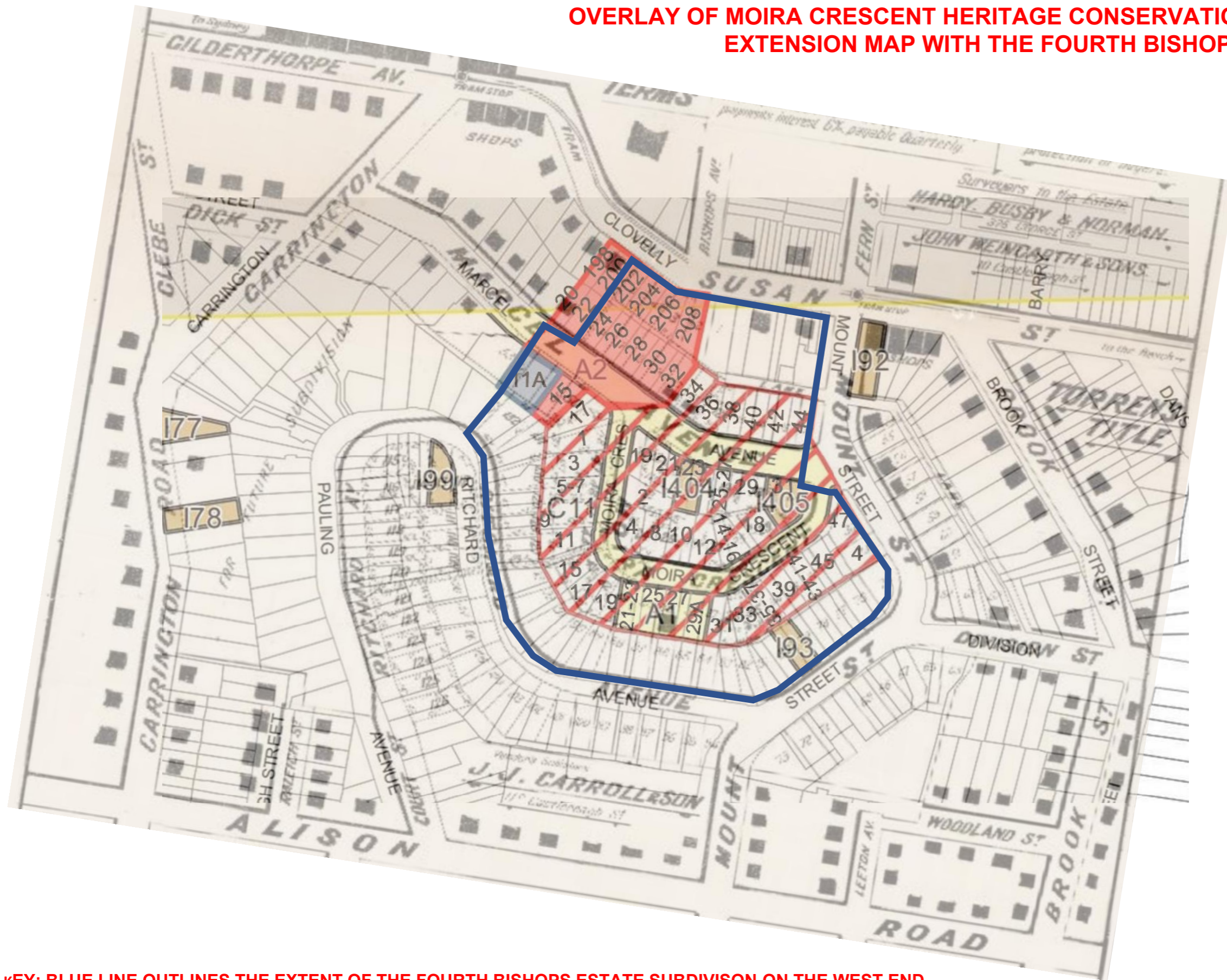


**Kerime Danis**  
 Director - Heritage

**Enclosed:**

*Overlay plan of Moira Crescent Heritage Conservation Area  
 (for 20 Marcel Avenue, Randwick submission)*

**OVERLAY OF MOIRA CRESCENT HERITAGE CONSERVATION AREA BOUNDARY  
EXTENSION MAP WITH THE FOURTH BISHOPS SUBDIVISION PLAN**



**KEY: BLUE LINE OUTLINES THE EXTENT OF THE FOURTH BISHOPS ESTATE SUBDIVISION ON THE WEST END**