



Re: DA DA/485/2016

Thank you etc

I'm an Epping based heritage consultant commissioned by the Epping Civic Trust to comment on the heritage aspects of the proposed development and on the reportage associated with it.

I'd like to firstly point out that all the heritage reports I that I have had access to (NBRS, Weir Phillips and Urbis) have been prepared by architectural firms and reflect their professional bias toward the physical fabric and architecture, while neglecting the other six criterion, which have an equal status under the heritage Act. These reports overemphasize and rely on the fact that No. 48 is not significant under **Criterion C – Aesthetic Significance**:

While it is agreed by all consultants that No.48 is a representative example of its type, as a late Victorian suburban development near Epping Railway Station, there is an intense focus on the extent of original fabric, of changes to the form and its setting. Including the following from:

Weir Phillips:

"No. 48 Oxford Street provides an example of the type of suburban development that occurred near suburban railway lines during the late nineteenth and early twentieth centuries."

Who acknowledge that:

"The fact that there is replacement fabric within the building does not, on its own, negate its heritage value."

And that

"Most of the restoration works that have been carried out are appropriate to the building."

NBRS similarly state that :

"As a conserved and adapted house, the front section of the building retains its late Victorian (Filigree) form and is representative of the style."



And that

“The reconstructed fabric contributes to the aesthetic value of the building.

Davies, from Urbis, agrees:

“... that the building still remains a representative example of its type aesthetically
....”

All these statements are qualified, with a litany of modifications including many minor elements, and indeed those expected as part of the normal maintenance of a 100 year old house. Although all changes are reversible it is insisted that these modifications warrant delisting as a heritage item, even while acknowledging, that the original form and design of the building is well known and understood, and therefore restorable.

No 48 was not heritage listed because it was designed by a great architect, or that some important technique was used in its construction. As NBRIS state in their statement of significance:

“The former house is a common type in its plan, materials and construction detailing ...”

We all agree it does not have aesthetic significance.

What is crucial to the significance of the house is that the form of the house as it presents to the streetscape is readable by the community. Other houses of the period are buried in the suburb – lacking the visibility of No.48 and incapable of telling the story of the Epping Commercial area as founded.

Council’s heritage planner concurs, he states “... the heritage item can still be read by the community in terms of its remaining context and setting, residential building form and original fabric. This is evident from review of the public submissions received.” From the non-specialist viewpoint the original form and setting are identifiable by the ordinary Epping citizen as not being contemporary. Many will be able to imagine how it once was and its very existence prompts questions as to the former character of the area. It’s the perfect cultural learning tool, an ambassador from the past to the many new residents of the Epping.

As the other six criteria convey, fabric and design are only part of what contributes to a place’s significance.



Significance also relates to meaning and reflects on the esteem with which a place is held in the community.

Let's turn to the other assessment criteria.

Criterion A – Historic Significance

No.48 is significant for its capacity to provide evidence of the past Epping. A domestic residence in an area that evolved into a commercial precinct. The site was in ownership of the Puckering family from 1895 to 1994. The construction of the house in Epping by an inner-city merchant (Edward Puckering) is reflective of the trend at the time for the middle class to move to healthier climates, away from dense inner city living with its attendant poor air quality. In this way, the house provides physical evidence of such movement. It can also demonstrate the class of resident taking up the then new Epping subdivisions. No.48 is associated with the NSW historic themes of "Towns, suburbs and villages", "Accommodation" and "Persons" and national themes of "Building settlements, towns and cities" and "Marking the phases of life". Thus it has historic significance.

Criterion B – Historic Association

This criterion refers to associations with a significant event, person, or group of persons."

None of the reports document research to establish the role of the Puckering family or their importance in the community, yet all conclude that the site is not significant under this criterion. The Puckering family were associated with Epping for 100 years in which Weir Phillips assert the family were involved in clubs and churches, but that this was 'not ... more than ordinary significance to the local area.' The research findings to support this claim are not provided. But what has emerged from the reports was that No. 48 was an ordinary house, representative of the time, and the ordinary activities of the people who occupied it. Cultural significance is not necessarily about the 'great' and the 'good'. Ordinary and Significance are not incompatible.

Criterion D – Social significance:

None of the reports indicate that any social significance assessment was undertaken to inform their assessment under this criterion. Nevertheless, as with Criterion B, they all report that No.48 has no social significance.



The Heritage Branch guidelines for inclusion lists the types of items that meet the social criterion: These are:

- items which are esteemed by the community for their cultural values;
- items which if damaged or destroyed would cause the community a sense of loss; and/or
- items which contribute to a community's sense of identity.

Nor does an item need to be valued by the entire community to be significant. The important issue is its valuation for “social, cultural or spiritual reasons” by part of the community. Social significance is clearly the “elephant in the room” tonight as demonstrated by the community representation. The Epping Civic Trust alone represents 320 individuals.

Unequivocally, it can be stated that:

No.48 is strongly valued by an identifiable Epping cultural group for cultural reasons related to the history of the development of Epping as a suburb. It contributes to that community's sense of identity and if damaged or destroyed there will be a sense of loss.

Criterion E – Research Potential:

Davies has assessed the site as having archaeological potential.

Criterion F – Rarity:

While this type of dwelling may not be rare in Sydney, it is rare in Epping and more so in the Oxford Street precinct. This is about local significance. It can be included under this criterion because it provides:

- evidence of a defunct custom, way of life or process – residential housing in Epping business district.
- Is the only example of its kind in Epping, and
- Shows rare evidence of a significant human activity important to the Epping community.

Criterion G – Representative:

The residence has been repeatedly described in all reports as representative of the Victorian (Filigree) form.

Yet Davies has excluded it on the basis that has lost the full range of characteristics of its type, albeit restorable.

Because No 48, as viewed from the street retains the form of the original house and much original detail, is representative because it has the principal characteristics of a Victorian residence and, can demonstrate a particular way of life and because of the esteem in which it is held. The significance of No.48, is related to its location in the commercial precinct, in a now prominent location, with its origins to the first urban subdivision to create the Epping suburb, linked with the establishment of the railway station, and its links to the Puckering family and their story of relocation from the inner city.

Conclusion

As Council's heritage advisor states: "Council cannot disregard heritage provisions of the LEP in order to maximize the development outcome, simply because then most (if not all) heritage items could be demolished to make way for the maximal achievement which zoning could permit. If approved, this approach would contradict Council's intentions clearly demonstrated when the item was listed, and it would set a most undesirable precedent for the demolition of other heritage items in the City of Parramatta."

On a state-wide level, that view embraces the concept that wherever there is high rise zoning that heritage items can be demolished to make way for that development.

Numerous dire depictions of the outcome if No 48 was retained – show a boxed in building [see Davies, p.17] This is an unlikely outcome at this site as with 48A out of the proposal, the low density school facilities adjacent to it, the removal of the pavilion from the front garden and the definition of a curtilage appropriate to a domestic setting. With sensitive design of what is a very substantial site No.48 could emerge as part of a cluster of historic buildings (the shop at 30 -42 Oxford Street, the church opposite and the school of arts. It will not be alone, but part of a representative microcosm of early Epping. The changes to the setting make it all the more imperative, for reasons of cultural cohesion, that the residence at No. 48 be retained.

Dr Sue Rosen 3 July 2018