



STRATHFIELD-HOMEBUSH
DISTRICT HISTORICAL SOCIETY

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Re Comments on draft Heritage Development Control Plan 2025

On behalf of the Strathfield-Homebush District Historical Society, we are writing to provide comments on the draft Heritage Development Control Plan 2025, published on the Council's website.

The Society is a community-based organisation dedicated to conserving, protecting, and promoting the history and heritage of the Strathfield district. The Strathfield-Homebush District Historical Society is an incorporated association under the *Incorporation Act* (NSW).

The Society provided comments to the last review of the draft DCP in September 2024. In a letter dated 11 November 2024 from Council states "Council encourages you to make submissions on future amendments to Part P as part of the comprehensive DCP review", however the Society received no notification from Council of the amended draft DCP. Given that the basis of recognising and conserving Heritage is for community benefit, the community organisations should be notified.

Despite concerns regarding the DCP controls overall, due to time constraints, this submission is mainly focused on the proposed mapping of the Heritage Conservation Area (HCAs).

Criteria for mapping HCAs

The draft DCP includes mapping of the Heritage Conservation Areas (HCAs) and recommendations on the level of contribution of each property to the HCA, using ratings of 'contributory', 'neutral' and 'intrusive'.

The Society does not support with the criteria utilised in the assessment of properties.

The definition for neutral properties is extremely broad, ranging from substantial alteration to original properties, new development and properties requiring only minor works to restore their contributory values. Therefore, significant alterations and additions modifying a historic property virtually beyond possible restoration is defined the same as a property requiring minor works. This means that properties which have had some

modifications, which is not unexpected given the age of many of the properties, can be categorised the same as a new development or one that has been substantially altered.

How is this classification useful to the conservation of heritage?

Properties can improve or deteriorate, a property can be upgraded from neutral to contributory, or a contributory item can also become neutral. A good example is the Council owned 'Halloween' 69 Redmyre Rd. This property was in very poor condition with the front verandah removed and bricked over. Using the definitions in the draft DCP, would likely to be classed as 'neutral' or even intrusive. However, after restoration works, this property is now classed as contributory.

The assessment of each property reflects a moment in time, but the listing in the draft DCP has long term impacts as to its importance and how it is maintained. What incentive is there for a property rated neutral to undertake any works to improve it to contributory level?

Throughout this draft DCP are numerous examples of houses with moderate modifications, but still largely intact and representative of their period, being classed as neutral.

Most properties included in HCA's in Strathfield only date for the 1880s-1930s. Therefore, the majority are well over 100 years old. It would be a rarity that no additions or modifications have occurred given the large span of time and the needs of the residents who have lived in them. The evolution of these properties must be considered in determining their heritage status. Applying a standard for contributory ratings which expects the building to be close or in original form is not realistic. Most local heritage listings have existed for 30 or less years.

Intrusive

The draft DCP uses the term 'intrusive' which clearly means properties that don't belong in the HCA. However, it has inflammatory connotations, where 'infill' is a more relevant term. Given that most of the HCAs are over a centenary in age, some have been altered by the patterns of subdivision, where new lots were created by subdivision of grounds or tennis courts long after the initial subdivision, it is likely there will be properties which are not original located in HCA's. This is part of the subdivision patterns of parts of streets like Redmyre Road and Abbotsford Road.

There are properties which are unsympathetic and detract from the HCA but there are also new developments which have been sympathetically designed to blend into the HCA or not detract from a Heritage Item. However, a term like 'intrusive' implies that all non-original properties are negative to an HCA. The term 'infill' means that it is not contributory or original but doesn't imply that the development is poor standard or damaging to the HCA.

An emphasis in the Heritage DCP should be identifying how infill properties, especially those that detract from the HCA's, can be sympathetically designed to support the HCA. The approval of inappropriate and unsympathetic development in HCAs or those in the vicinity of Heritage items is one of community's main complaints about heritage. Another issue is the obvious violations of the current planning codes such as removal of shopfronts, illegal demolitions and tree vandalism.

The Society does not support how properties have been classified in this DCP, especially identification of contributory and neutral items which in this draft DCP are not consistent throughout the plan. For instance, in some cases a house built in 1940s is neutral in an HCA which contains Victorian or Federation styles, but in other cases a similar house is intrusive. Therefore, these classifications may create more harm than benefit to an HCAs.

Statements of significance

The Council website states that the Statement of Significance outlines the key reasons for conserving the site, including its historical, aesthetic, social or technical significance. Most of the statements have little or incorrect historical, social or technical information. Most statements are descriptions of aesthetics of the houses and streetscape.

The statements are not consistent. For instance, Birriwa Ave HCA notes that the consistency is due to the same builder, however the Albert Road West HCA also has one builder, but this isn't mentioned in the Statement of Significance. Ditto comments on street trees, garden settings etc.

Also there is a frequency of the word 'modest' throughout the DCP or throwaway references to 'working families' which appears to be a social commentary but not referenced.

Additional controls

The point of additional controls is to set a standard for a feature of a specific HCA, which is not covered by the general guidelines in the DCP. However, despite making comments in the Statement of Significance about something which is a feature of the HCA, there is no consistency in the recommended Additional Controls. Both Vernon St HCA and Woodward Ave HCA are primarily Victorian, however there are few controls in Vernon St compared to Woodward Avenue.

Other comments

The DCP appears to have no controls for heritage listed items that are not buildings eg landscape, parks etc.

There seems to be no controls for development in the vicinity of an HCA.

There seems to be no controls on building of duplexes, which are extraordinarily disruptive to the character and streetscape of an HCA. There are a number of battle axe blocks in HCA with rear housing, which have much less impact on heritage conservation.

Are there any protocols for managing Council owned heritage properties?

Vernon Street conservation area.

Statement of Significance

The Statement of Significance should also recognise that the Vernon Street HCA includes properties with Alviston Street addresses. Note the description of the Woodward Avenue HCA includes reference to the three streets in the HCA.

The Statement of Significance should recognise that this is primarily a Victorian precinct with some Federation.

Despite making comments on the streetscape and established tree planting and garden settings, there are no additional controls to maintain garden settings nor is there any commentary on retaining street trees or redevelopment of intrusive items or replacement with materials.

Mapping errors

3-5 Vernon Street on the map indicates two Heritage items. However, there is only one heritage item on the LEP which is the Russian Orthodox Church. What is the second item?

Mistakes and inconsistencies

The draft DCP features a photo on page 81 as an example of heritage in Vernon Street, yet has classed this same property as a neutral property.

1 Vernon Street is recommended as 'neutral'. This house presents to the street as Federation styled. There was a building application in 1915 for a residence by the owner of this house, which could be new or an overlay and addition to the original Victorian house. Overlaying new styles over older buildings is common in Strathfield. This property has many important local historical associations, which have not been considered in this assessment. Note there is also another Federation house at 12 Vernon Street, which is a contributory item. The Vernon Street HCA is primarily Victorian but not exclusively.

A row of houses at 9, 11 and 13 Vernon Street are all recommended as "neutral". 11 Vernon Street is a red brick 1950s or 1960s house, which is infill. It replaced a Victorian house called 'Allowah'.

9 Vernon Street is a Victorian Italianate house. It should not be 'neutral' as it clearly contributes to the HCA as a Victorian Italianate house. Neutral is defined in the draft DCP as neither contributing or detracting.

13 Vernon Street is a Victorian Italianate villa. It should not be 'neutral' as it clearly contributes to the HCA to a high extent. The draft DCP features a photo of this house on page 81 as an example of heritage in the Vernon Street HCA.

On the east side of Vernon street, the numbering is impossible to follow as it is numbered 2 and then 20. This should be better mapped.

28 Vernon Street is recommended neutral. Agreed as the original house has altered significantly.

32 Vernon Street is recommended as intrusive. It is a new house, c.1950s or 1960s and should be 'infill'.

34 Vernon Street is recommended as 'neutral' but clearly contributes as a Victorian Italianate house. It is unusual being two storey, but it is built on a very narrow block of land, unlike all other properties on Vernon Street which have large lots of land. It has obviously had additions, like many other heritage properties in Strathfield. However, to rate this as neutral, using the DCP definition implies that it makes no contribution to the HCA.

Additional controls

The additional controls for the Woodward Avenue HCA are far more extensive than Vernon Street HCA despite both featuring predominantly Victorian style properties. Why is there a difference in the planning controls?

Churchill Avenue HCA

Statement of Significance

The Statement of Significance should also recognise that the Churchill Avenue HCA includes properties with Homebush Road addresses.

Why have the properties at 42 to 46 Churchill Avenue have been exempted from the mapping of the Churchill Avenue HCA. This is on the south side of Churchill Avenue finishing on Elva Street. 42 Churchill Avenue 'Wychwood' is a heritage item (Federation house, garden and fence) on the LEP. There is no reason why the boundary of this HCA has excluded three properties, when on the north side of Churchill Avenue, the boundary finishes on Elva Street.

The HCA also contains Sydney Water historic infrastructure, which is missing from the statement.

Additional controls

Additional controls do not include any controls regarding retention of gardens, street planting and verges. It is also silent on retention of fencing.

In contrast, the Homebush Road HCA includes additional controls such as the soft landscaping within this front setbacks, retention and reinstatement of period gardens ie. gardens are encouraged. However in the Churchill Avenue HCA this issue is not addressed.

Woodward Avenue conservation area.

Statement of Significance

In the draft DCP, the Woodward Avenue HCA has been renamed the Woodgreen Estate HCA in the draft Statement of Significance. The Society does not support this proposal.

Most other HCAs in the Strathfield LGA are named after the dominant street, where there contained multiple streets. Woodgreen is not a name commonly known in Strathfield. It was also the former name of the street, Torrington Road, which is also located on this estate. It would be unnecessarily confusing to the public to rename this HCA.

The 1880 Woodgreen Estate also includes properties on Alviston Street, which are located in the Vernon Street HCA on the Strathfield LEP.

Additional Controls

Despite making reference to garden settings in the Statement of Significance, there are no additional controls on maintaining garden settings.

Woodward Avenue HCA maps

'Wavertree' 103 The Boulevard Strathfield in the draft DCP is classed as 'intrusive'. 'Wavertree' is an original Victorian house, albeit with alterations and additions. The house has important local historical associations and has been a private home and a nursing home/aged care facility. This building should be classed as neutral rather than intrusive.

2 Woodward Avenue is a 1950s red brick single story dwelling and recommended as neutral. This is not an original building. It would normally be considered 'infill'.

3-5 Albyn Road, 7 Albyn Road, 22 and 24 Woodward Avenue are new developments and classed as intrusive in the draft DCP. They should be 'infill'.

Birriwa Street Conservation Area

Statement of Significance

The Statement of Significance references the "Enfield Township" and then later refers to it as the "Strathfield South Township" which is inconsistent. It is also confusing what the term "township" is supposed to mean.

Generally the term 'township' refers to an early settlement. However, Birriwa Ave was developed in the 1920s. It was located in the west ward of Enfield Council, which was incorporated in 1889.

Additional controls

The recommended Additional Controls recommend the preservation of the street tree planting scheme of *Nerium Oleander*. While this appears to be the species of the current street trees, is there any evidence to support this planting scheme being original? We note that though this species was often used for street plantings, *Nerium Oleander* is also classed as noxious. If so, should consideration be made to replacing the trees with an alternative period appropriate mature planting scheme?

It is refreshing that streetscape plantings is included in additional controls, however this is not consistent in descriptions of other HCAs in the draft DCP. Most of the other HCA's do not include any additional controls for streetscapes and/or plantings.

Pair of Federation Queen Anne style houses (Burlington Road).

Statement of Significance

Queen Anne is missing an 'e' in the header in the draft DCP document. This point was made in our submission on the 2024 review of the draft DCP.

Why has Council not expanded the HCA to include two Victorian villas at 61 Burlington Road (a heritage item) and 57-59 Burlington Road (not protected), as both of these houses were developed in the same period by the same builder.

Albert Road Central conservation area.

Statement of Significance

The Statement of Significance contains incorrect historical information.

The precinct of 67-75 Albert Road is part of a larger subdivision of vacant land owned for a time by the Camden Congregational College. It is not a church, it was a college. This point was made in our submission on the last review of the draft DCP in 2024.

This land had street frontages on Albert Road, Homebush Road and Beresford Road. Houses located at 25-39 Homebush Road are part of this subdivision and are contained in the Homebush Road HCA.

It is noted that no other HCA makes reference to prominent former residents in their Statement of Significance, despite many of the properties in the HCAs are linked to people of historic significance.

The house at 65-69 Albert Road is no longer the Strathfield Education Centre and reference to this should be removed. The house was originally called 'Arnottholme'. It was built for William Arnott, founder of Arnotts Biscuits. The house number is not identified in the Statement of Significance.

If the draft DCP intends to reference prominent former residents in the Statement of Significance, it should include sufficient information to identify their importance other than a name, so that historical associations are meaningful.

The Boulevard Retail Conservation Area

Statement of Significance

29 The Boulevard is recommended in the draft DCP as intrusive. The building appears to be original and one of a set of four connected buildings, located between 25 to 31 The Boulevard. The first floor roof and facade has clearly been altered, however the building in the HCA listing is the shop-top building, not just the facade or first floor.

If this building is classed as intrusive, it will incentivise the demolition and redevelopment of the individual site. It would make more sense for Council to add controls supporting restoration of the first floor facade and roof, so that the consistency of the four connected buildings is conserved.

Additional controls

The additional controls are not consistent with the Statement of Significance.

- The additional controls only make reference to Federation shop fronts but not to Victorian style fronts.
- The additional objectives state the purpose is 'to preserve and restate original early Federation shopfront facades where possible'. What about the Victorian style shop fronts and facades?

- They list 'sandstone' as a characteristic material for finishes and colours. Is there any sandstone used as a material in this row of shops? It also instructs the preservation of sandstone.

Are there any guidelines on installation of air conditioning units on front facades in a HCA?

Albert Road West conservation area.

Statement of Significance

The Statement of Significance for Birriwa Avenue HCA commented that the consistency, coherence and significance of the HCA was due to the development from the same builder. However, all properties in this HCA were built by the same builder, but this is not referenced in the Albert Road Statement of Significance. Is this not important to the development of the HCA?

Homebush Road HCA.

Statement of Significance

The Statement of Significance refers to "its genesis from the c.1880 Bushy Hill Estate subdivision", however the Bushy Hill Estate was not located within the boundaries of the Homebush HCA.

The statement about the Church building being inconsistent with the residential character makes little sense as Churches have been permissible development in residential areas in Strathfield LGA, even under the restrictive 1920 Strathfield Residential Proclamation. The HCA also contains a school.

62 and 64 Homebush Road are interwar bungalows, built in 1934 and 1935. 64 Homebush Road is reasonably in-tact and is an original building. 62 Homebush Road has similar history but has had fire damage. Why are they neutral? These two buildings are original, building was delayed on these sites as the land was acquired for another purpose but never built upon.

58-60 Homebush Road is a prominent site and the original house is still evident despite the modifications as a convent. This part of Homebush Road is somewhat eclectic and this property contributes to the overall character of this part of the precinct.

28 and 30-34 Homebush are multi-unit developments and though are not original, clearly have been designed to complement the HCA and the Heritage items in close vicinity. Though these could be considered infill, it does demonstrate that new development can be scaled to not intrude or overshadow the character of the HCA.

Redmyre Road Heritage Conservation Area

25 Redmyre Road has a recommended 'neutral' classification. This is a Federation house that contributes to the HCA.

44 Redmyre Road has a recommended 'neutral' classification. Though this house requires restoration works and is still clearly a Victorian house, which could contribute to the HCA in a positive way.

47 Redmyre Road has a recommended 'neutral' classification despite being a reasonably intact Federation house. This should be contributory.

48 Redmyre Road has a recommended 'neutral' classification, while 46 Redmyre Road is recommended as contributory. Both 46 and 48 were built by the same builder in 1924.

68 Redmyre Road is one of a set of connected Victorian Italianate villas. Despite the front addition of the doctor's surgery which was added in the early 1960s, the house is still recognisably a Victorian villa and contributes the row of four Victorian villas.

78 Redmyre Road has a recommended 'neutral' classification. 72 to 78 Redmyre Road are a row of four federation style villas all built by John Lyon Gardiner. There is no obvious reason why 78 Redmyre Road is not classed as contributory.

73 Redmyre Road has a recommended 'neutral' classification. The house retains form, scale and has historical significance.

83, 85 and 87 Redmyre Road are recommended as intrusive but should be neutral. Most of these houses are not recent developments and pre-date the HCA listing.

93 Redmyre Road is a 1950s red brick house and classed as neutral, but 83-97 are intrusive?

99 Redmyre Road is a 1940s house. This is classed as contributory, why?

103 Redmyre Road is a Victorian Regency house called 'Greystanes'. Yet this is classed as neutral, when it should be contributory.

Additional controls

Note there are two median strip plantings. One near Chalmers Road and the other near Raw Square.

Abbotsford Road HCA

3 Abbotsford Road is an intact original interwar house. This is recommended as 'neutral' despite the house contributing to the HCA.

4 Abbotsford Road is a reasonably in-tact interwar house. Why is this neutral, when buildings with substantial unsympathetic changes are rated also as 'neutral'?

5 Abbotsford Road is recommended as 'contributory' but the house has been significantly modified. Elsewhere in this draft DCP, this would be neutral.

11 Abbotsford Road is recommended as contributory but is an infill 1950s redbrick house and is infill.

13 Abbotsford Road is recommended as intrusive but is a contributory Interwar Bungalow.

15 Abbotsford Road is recommended as neutral but is an infill 1950s redbrick house.

38 and 40 Abbotsford Road are recommended as neutral, despite both houses being original buildings. They should be contributory. We note 40 Abbotsford Road, which was illegally demolished, should be restored back to its original state.

59-61 Abbotsford Road is recommended as intrusive. This house was built in 1911 and though it has been modified, it is hardly intrusive and should be at least neutral.

100 Abbotsford Road is recommended as neutral but is a recognisably a Victorian Italianate villa. Should be contributory

102 Abbotsford Road is recommended as neutral but is a recognisably Victorian Italianate villa. Should be contributory

Village of Homebush retail conservation area

Statement of Significance

The conservation area is titled 'Village of Homebush' retail conservation area, but it is referred to as Homebush Retail HCA in the Statement. This should be consistent.

3 Rochester Street is infill. The original building burnt down and was replaced.

31-35 Rochester Street was suffered a fire in 1958 and was rebuilt. The shopfronts are at least consistent with the rest of the HCA. Support neutral listing.

Merley Road HCA

2 Merley Road has a recommended 'neutral' classification. This is reasonably in-tact and should be reassessed.

4 Merley Road has a recommended 'intrusive' classification. This appears to be an original house but with unsympathetic modifications. Is it infill or neutral using the definitions in the draft DCP?

10 Merley Road has a recommended 'neutral' classification. The original building is evident despite the first floor addition. Should be reassessed.

33 Merley Road has a recommended 'neutral' classification. This should be contributory. The house is similar scale, form etc to the HCA.

53 Merley Road has a recommended 'intrusive' classification. This is a new development but obviously designed to fit into the HCA. Using the draft DCP definitions, shouldn't this be neutral?

Additional controls

Could the controls on street plantings be rewritten?

Marion Street HCA

Statement of Significance

The Statement of Significance does not refer to the 1923 Crown of Strathfield estate on which the HCA is located. Given the estate plan sets out the street layout and includes a park, which for some reason is excluded from the HCA, a reference to its historical context would support the Statement of Significance.

It states that the later construction of dwellings from the mid-to-late 1930s evidences the impact of the Great Depression and the 'subsequent period of economic hardship'. This implies that the economic conditions following the Great Depression were worse than the Great Depression. It would be difficult to find evidence to support this assertion.

The statement 'working families of the era' in their modest built form houses seems to be making a statement about the class of the owners or occupiers of these houses. On what basis is this comment made and what is the relevance?

3 Marion Street has a recommended 'neutral' classification in the draft DCP. This is not supported. It is recognisably an Old English style house, with some modifications.

5 Marion Street has a recommended 'neutral' classification. This is not supported. The house is an Inter-War Moderne Bungalow, which is largely intact.

11 Marion Street has a recommended 'neutral' classification. This is not supported. This house has been extended and was larger than many other properties in Marion Street but still retains most of its original features and appears to have originally been a two-storey house.

18 Marion Street has a recommended 'neutral' classification. This house has a first floor addition, which is increasing not rare in this HCA but retains the original bungalow ground floor. It is a prominent house on the corner of Edgar Street and should be contributory. It is also the first house built in the HCA in 1929 for a former Mayor William Cosgrove.

16 Marion Street has a recommended 'neutral' classification. This is an interwar Spanish Mission House, which is rare in this HCA. It has been rendered for several decades and the rendering may be original. If so, it probably should be contributory. Needs research.

14 Marion Street has a recommended 'neutral' classification. This property has had first floor additions, but many elements of the original design have been preserved including use of brick work, brick fencing etc. It may not be highly contributory but the additions are consistent with the many of the elements that define the character of this HCA.

50B Marion Street has a recommended 'intrusive' classification. This is new development but using the draft DCP criteria of neither adding or detracting, it is probably neutral.

Additional controls

The controls on tree plantings could be better expressed.

Meredith Street conservation area Victorian Villa style group.

Statement of Significance

Support recommendations.

Welfare Street conservation area.

Statement of Significance and Additional Controls

If this HCA is retained in the Strathfield LEP, the additional controls and Statement of Significance are supported.

The Society can be contacted by email: strathfieldhistory@gmail.com

Yours faithfully

Management Committee
Strathfield-Homebush District Historical Society