



Beecroft Cheltenham  
History Group

c/- 4 Wandeen Avenue  
Beecroft NSW 2119  
19 October 2012

Director, Infrastructure Projects  
Epping to Thornleigh Third Track Project SSI 5132  
NSW Department of Planning and Infrastructure  
GPO Box 39  
SYDNEY NSW 2001



Dear Sir

**Heritage Assessment Report – Environmental Impact Statement  
Report**

Please find attached the submission of the Beecroft Cheltenham History Group in response to the Heritage Assessment Report attached as part of the Environmental Impact Statement for the Epping to Thornleigh Third Track Project.

Please advise if any further assistance is required.

Yours sincerely

Roderick Best  
Chair



Cc Mr M Stove, President Beecroft Cheltenham Civic Trust  
Hon G Smith, Member for Epping  
Hon P Ruddock, Member for Berowra

**Response to the Historic Cultural Heritage Assessment commissioned for the Northern Sydney Freight Corridor: Epping to Thornleigh Third Track Project. This assessment was undertaken by Artefact Heritage is dated September 2012.<sup>1</sup>**

This response is prepared by the Beecroft Cheltenham History Group a sub-group of the Beecroft Cheltenham Civic Trust.

## 1. Introduction

It is noted that there is a separate Aboriginal Cultural Heritage Assessment report also prepared by the same authors that is not commented on in this response.

The Assessment Report is stated to have been prepared in accordance with the NSW Heritage Manual Guidelines and informed by a 'field survey' that took place on 18-19 January 2012.

Three initial general criticisms are made of the report. These are then followed by comments on specific locations covered by the report.

### *Community esteem*

While extensive reference is made within the report to the publications of this group (the Beecroft Cheltenham History Group) no contact was made by the authors with this group. Nor is there any other reference in the report to contact with other relevant members of the community. This appears contrary to the Guidelines quoted as those guidelines require as part of any investigation of heritage significance consideration of "the community's understanding of the item,"<sup>2</sup> together with a consideration of the four main heritage values adopted by that guideline which are "historical, aesthetic, social (contemporary community esteem) and research/technical significance."<sup>3</sup> Neither the community's understanding nor contemporary community esteem are referred to within the report notwithstanding a demonstrated knowledge of how to access such community views. There is no indication that any attempt was made to gauge these elements or to reach an understanding of the impact of this development, in the way in which it is proposed, on the contribution of the heritage conservation area to what the community perceives as the 'village' nature of the two communities of Beecroft and Cheltenham.

The community perception of this locality being a 'village' is a concept that can be shown to exist consistently from the early nineteenth century to the present. This is a

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<sup>1</sup> The report was accessed in September 2012 from [http://majorprojects.planning.nsw.gov.au/index.pl?action=view\\_job&job\\_id=5132](http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=5132)

<sup>2</sup> "Investigating Heritage Significance" p9

<sup>3</sup> "Altering Heritage Assets" p2

consistent strand in understanding the heritage of the locality and yet no discussion occurs in the Assessment Report on how the proposal impacts on the community's appreciation of how individual items contribute, or the heritage conservation area as a whole contributes, to this sense of being a 'village.' This failure demonstrates a lack of appreciation of both how these communities understand heritage in these locations and how contemporary community esteem of certain items establishes significant social heritage value.

#### *Significance in context not isolation*

The guidelines referred to also emphasise the absolute imperative to consider heritage both within its broader context and within broader heritage values rather than solely on aesthetic grounds. This Assessment Report provides little discussion on the heritage conservation area as a whole. Not only is this general approach stressed in the guidelines to which the Assessment Report ascribes importance but the Heritage Development Control Plan in which this proposal is taking place also emphasises the importance of considering the area as a whole. For example, it states:

"The Beecroft Village Precinct demonstrates the layers of all its periods of residential development (one house and one lot) including some of the earliest buildings in the Conservation Area. The Precinct contains intact streetscape groupings of Federation and Inter-War houses and infill Post-War housing, all of which collectively contribute to the heritage value of the Precinct."

This failure to consider the collective contribution of the entire heritage conservation area; the collective impact on individual items when aggregated and the impact of the development on that entire area is a significant deficit which renders the entire report flawed.

To consider this collective aspect it would be necessary to consider:

- the extent of the reduction to the tree corridor both as a backdrop to vistas throughout the heritage conservation area as well as within individual precincts,
- the impact of noise, other forms of pollution and increased freight traffic on continuing use of community amenities like playgrounds, parks, halls, sporting facilities and guide halls.
- The impact of vibration, noise and other forms of pollution and increased freight traffic on the aesthetic significance of war memorials and other places of public commemoration.
- The impact of increased road traffic during construction, vibrations arising during construction and thereafter during the increased use of the rail corridor, noise and other forms of pollution on the fabric of the heritage items – including mortar, lintels, glass and tiles.

When looking at individual heritage items the sole aspect considered by the Assessment Report in any detail is the potential impact of the proposal on individual heritage item and then only on the visual impact of the proposal on those individual heritage items. Numerous examples of how the report concentrates upon single items and only upon the visual impact of the proposal could be provided. These include:

*Beveren* (110-112 Sutherland Road): "The property is located around 50 metres from the proposed impact area and, as no changes are proposed along the eastern side of the railway corridor, the item will not be impacted by the development"<sup>4</sup>

1 Wandeem Avenue: "The property is located over 50 metres from the proposed impact area and views to the railway line are screened by vegetation. No changes are proposed along the eastern side of the railway corridor and the development will have no impact on the house."

Wandeem (2 Wandeem Avenue): "is located approximately 70 metres from the project boundary and is screened by vegetation in the rail corridor. The development would have no heritage impacts on the house itself, or its views and setting."

These three quotes are chosen to illustrate not just the point being made but also to note how the Assessment Report seeks to adapt its comments on individual properties to ensure that no significant impact is found. In fact, each of these properties are in close proximity as each of these properties has a boundary on Sutherland Road (which runs parallel to the railway line) and yet:

- Care is taken to give each a different distance from the proposed development. This distinction is only relevant for the visual purposes of the individual properties. It gives a false sense of how the precinct is impacted by the proposal by considering individual items rather than the collective sense of the properties;
- none of the descriptions of the impact of the development in these quotes recognises the impact of a third freight line in terms of noise and pollution (but rather each restricts comments to any immediate, solely visual impact);
- none recognises the impact of increased diesel freight carriage (that is the qualitative impact of having such a level of increase in the amount of traffic irrespective of whether noise and other pollution is controlled) on a residential area as fundamentally altering the heritage nature of the entire conservation area.
- none discusses the impact on the heritage nature of the conservation area as a whole where an impact on a large number of properties might amount to a significant impact on the whole – even though it is not a lesser impact on individual items;
- none discuss the impact of maintaining the amenity of the area so that "the socio-economic status" which the report describes as fundamental to the

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<sup>4</sup> p 92

heritage nature<sup>5</sup> is retained ie if the impact of development is to lower the attractiveness of living in close proximity to the development will this in turn impair the capital base of heritage homes of this quality as well as the amenity of their use and so their future maintenance;

### *Selective use of information*

The earlier quotes establish that where a thin strip of vegetation will remain, this is regarded as sufficient to hide the visual impact of the development to such an extent that no heritage impact is acknowledged.

Where this will no longer be the case, such as opposite the Cheltenham Recreation Club, then a 1943 aerial photograph is used to demonstrate that at one point in the history of the area vegetation coverage along the corridor was slight then is sufficient to say that there will be no heritage impact because, in any event, "views from the club are not a vital facet of the item's heritage significance."<sup>6</sup> If material from 40 years earlier was quoted then it would be noted that the entire area along the railway corridor was described as so thickly timbered that it was not possible to determine where (in this case the Village Green but also down through Cheltenham) ended and the bush commenced.<sup>7</sup> The photograph reproduced on page 38 of the tree coverage at Beecroft was typical of the tree coverage at Cheltenham at the same time. Indeed, in 1943 large tracts of Beecroft also appeared sparsely timbered at this time – this being the end of small dairying properties in the locality and so, also the end of large scale clearing for primary industry. To suggest that the removal of vegetation in 2012 is not contrary to the heritage of the area because of a photograph in 1943 or indeed a photograph in the 1880 when the locality was known as Barren Hills because of the ravages of the timber getters, is using selective information from history to make a point. It fails to recognise that it is otherwise indisputable that one of the identified heritage items of all other heritage discussions of this area and one of the values behind classifying this as a conservation area is because of its "mature landscaping and remnant forests."<sup>8</sup>

Another example is in the description of the gardens along The Crescent, Cheltenham.<sup>9</sup> These gardens and their front fences are referred to as being of the 1940's with comment on whether recent landscaping has 'reduced the heritage significance of the item' as a 1940s/1950s garden and fence. As referred to elsewhere it is questionable whether the heritage value of the area is impacted by the nature of the landscape changes in a single property and secondly there is a failure to recognise the fence and significant garden elements as remnants of the original Mount Pleasant Estate of the

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<sup>5</sup> eg p 94

<sup>6</sup> p 65

<sup>7</sup> Beecroft Cheltenham History Group *Beecroft and Cheltenham: The shaping of a Sydney community to 1914* (Beecroft, 1995) p 238

<sup>8</sup> Hornsby Shire *Heritage Development Control Plan* p 30

<sup>9</sup> pp 47-52

Chorley family – the founding family of the suburb. Mount Pleasant was built in the 1890s and demolished in 1938. The stone for this fence was quarried between Day and Cobran Roads in the same suburb.<sup>10</sup> This failure to recognise the history of particular items, the heritage value of those items and the connection of the heritage landscape which crosses the railway corridor all point to significant flaws in this report.

A final example is the description of a fine example of late 1920's design in the form of a stylised sarcophagus which is the memorial to the dead of both World Wars on Copeland Road East, as simply having been "built in 1993."<sup>11</sup> It is of the same school as other constructions of that era, such as the Museum of Contemporary Art in The Rocks. The memorial was unveiled in 1928.

## 2. Specific deficits in the Assessment Report

### 2.1 Hill settlement

Beecroft and Cheltenham were established as dormitory suburbs along the 'hill settlement' model.<sup>12</sup> This means that they were advertised for their altitude, the supposedly healthy qualities of living above the miasma of the urban climate. They had larger, more rural blocks and settings. They retained larger trees and grew other trees of similar size such as the traditional blue spruce or the bunya pine. The houses were set within these pastoral settings with large private gardens and a number of public parks and reserves. The reserves were often privately donated or privately maintained or privately planted when on public land.

Streetscapes which reflect these features will be impacted by this development in the areas of Sutherland and Malton Roads, Wongala Crescent, The Crescent, Cheltenham Road and The Boulevard.

The Assessment Report does not consider how the heritage values deriving from this history are to be maintained by a proposal which concerns increasing in the number of railway lines by a third and using this third railway line to solely carry diesel freight trains with consequent noise and other pollution.

### 2.2 Corridors of remnant forest

From the initial urban settlers preservation of corridors of remnant forest has been an important aspect of the heritage of this area. This importance is not confined to maintaining a backdrop of high trees to heritage houses – as important as that might be. Former residents have included people critical to the establishment of Kosciuszko

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<sup>10</sup> Beecroft Cheltenham History Group, *Beecroft Cheltenham Heritage Walks* (2004, Beecroft) p 14.

<sup>11</sup> p 40

<sup>12</sup> A S Inglis *Summer in the Hills: The Nineteenth century mountain resort in Australia* (2007, Melbourne)

National Park (Baldur Byles) Bouddi National Park (Marie Byles) NSW state flora reserves (George Baur), botany (Joyce Vickery) and other notable contributors to our understanding of the environment. The existence of remnant forest contributes to our understanding of the environment where such a range of diverse people all lived. This context contributes to explain the society which produces people prepared to make contributions to our State wide heritage of preserving and properly utilising our environment.

Reduction of the small number of remaining corridors of remnant forest needs to be considered against the State wide heritage value which these corridors have in Beecroft and Cheltenham. The Assessment Report fails to address this aspect at all.

## 2.2 *Beecroft Railway Station Precinct*

Beecroft Railway Station precinct comprises not just the station but also the neighbouring parkland, children's playground and the heritage plantings. The large pines in this area date from possibly the 1898 planting supplied by the Botanic Gardens. The removal of 2 trees removes one third of these trees and yet despite this being an apparently significant numerical proportion of the trees being removed, the remaining trees are said to "effectively maintain the landscape qualities of the park and the visual connection with the establishment of the gardens in the late 19<sup>th</sup> century."<sup>13</sup> It would not seem unreasonable to conclude that a similar comment would be made if all but two trees were left in the middle of railway tracks constructed on either side of the remaining trees. The approach of leaving the façade of a building as a way of maintaining heritage is strongly criticised in the NSW Heritage Manual Guidelines.<sup>14</sup> Yet while the Assessment Report seeks to uphold these guidelines it says that it is acceptable to leave a much reduced landscape so that only significant trees on the street elevation remain. No arborist's report accompanies the Assessment Report despite the heritage items in question being trees rather than built structures. No mention is made of the removal of at least one replacement pine that has commenced to grow in the area of the remnant platform and has (possibly) 20 years growth.

In commenting on the precinct, the Assessment Report does not discuss the connection between this precinct and the retail area of the Village. The history of the area shows that the retail area was initially scattered from the original Higgins store opposite the Village Green to a number of stores near the railway station. The retail area was therefore traditionally interspersed with open space. The concentration of stores near the railway precinct did not occur until the 1970s and this concentration will continue to occur as a consequence of recent planning changes by Hornsby Shire Council.

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<sup>13</sup> p 43

<sup>14</sup> "Altering Heritage Assets" p 2: "Nineteenth century commercial buildings lose significance if only the street elevations are maintained."

What the Assessment Report fails to comment on is the cumulative impact of this proposal and the core element of the heritage nature of this development as always incorporating actively used open space as part of the Village nature of the suburb. The image of a children's party near the station is included as a quaint image<sup>15</sup> without any recognition that the bringing of a third line closer into the shopping precinct, the destruction of the vegetation barrier between the line and the children's playground significantly impairs the heritage nature and amenity of this precinct. The heritage idea so beautifully encapsulated in the image from 1896 (and which has continued until the present day) is of children playing within a village environ. That concept, that core heritage feature, will be lost through the destruction of this vegetation and the bringing of a freight line right to the boundary of the playground without any commensurate amelioration of the impact of this intrusion. This is a destruction not just of the amenity of the playground, but also of the unbroken heritage that gardens, trees and open space have played in the maintenance of the village atmosphere of the Beecroft retail area. This impact needs to be particularly addressed in a Statement of Heritage Impact.

Similarly, the Willis<sup>16</sup> memorial dating from the Boer War<sup>17</sup> will, under the development, be located on the precipice of the embankment for the new third freight line. This creation of an encroaching<sup>18</sup> cutting is remarkably said not to have any impact at all.

The co-location of war memorials in this site is unique in this State. The fact that there is a memorial for an individual soldier who died in the Boer War in a bushland setting as it has been since co-location in the 1930's to form part of a larger memorial complex does not rate a mention in the Assessment Report. This is a matter of State heritage significance that will be impacted without any mention, consideration or deliberation. In particular no mention is made of the impact of vibrations on this monument.

The memorial for The Great War is stated by the report to have been built in 1993.<sup>19</sup> It was in fact unveiled on 11 November 1928.<sup>20</sup> This is a notable error in describing this collection of war memorials. The Assessment Report states that this collection of memorials, unique in this State, "would not be impacted by the proposal."<sup>21</sup> This is despite the railway corridor being increased by one third within 10 metres of the site of these memorials and the commensurate increase in noise, other pollution and the increase in freight traffic travelling through this corridor. The change in the value of this site will be significantly changed by having the new line encroaching physically as well as aesthetically. It is difficult to accept that such a statement could be made in the Assessment Report.

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<sup>15</sup> p 38

<sup>16</sup> Misdescribed as the "Wallis" memorial on p 33 of the report.

<sup>17</sup> T McCaskill *One Great Hour* (Beecroft, 2000)

<sup>18</sup> p 43

<sup>19</sup> p 40

<sup>20</sup> *Sydney Morning Herald* 12 November 1928

<sup>21</sup> p 43



### 2.3 *Beecroft Tennis Club*

Lawn tennis commenced in 1872 in England and the rules of the modern game were formalised in 1877 when the first 'Wimbledon' competition was held. The Beecroft tennis complex was constructed on the Village Green in 1898, making it one of the very early tennis clubs established in Australia and still operating continuously on the same location. It does not gain separate mention in the Assessment Report which refers collectively to the Village Green. The edge of the tennis complex abuts the rail boundary. The heritage nature of these courts resides in the rural setting of the village green and in having tennis played locally, at a high competitive level within a setting established during Edwardian times. There are few tennis courts such as this which have been maintained in their original setting anywhere in the world. Their heritage significance is of the utmost importance. This importance is to be found not just in the value of their visual impact but also their contribution to the community and as part of the concept of a 'village green.'

This proposal clearly removes vegetation bordering the courts which frames vista and blocks distracting activity and noise. The proposal locates a diesel freight line in between the narrow corridor between the courts and the existing rail lines. The proposal increases the amount of freight traffic. The maintenance of the amenity of the courts will be impaired.

### 2.4 *Cheltenham Railway station precinct*

Along the Crescent (and especially opposite the station) there are a number of individually listed heritage properties. The Assessment Report acknowledges that the proposal will "impact on views from the house."<sup>22</sup> The proposal is for a two storey development increasing railway lines by a third, increasing the amount of diesel freight traffic, with significant parking alteration and the removal of almost all existing vegetation within a residential part of a heritage conservation area. Of this impact on the heritage significance of this precinct the Assessment Report states that "while not ideal would not have a significant negative impact."<sup>23</sup> This assertion is difficult to reconcile with the physical change being wrought.

The bulk and size of the proposed development, especially in the absence of any other building of a non-residential nature in the locality demonstrably and detrimentally impacts on the heritage of not just the conservation area (of which the railway station forms part) but of the individual items that will now be denuded of their garden and bush land settings.

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<sup>22</sup> p 59

<sup>23</sup> p 59

The building of a platform at Cheltenham had not originally even been contemplated. The surveyors ruled out a platform because of the steep grade on the lines. It was not until 1898 that prominent Cheltenham resident William Chorley lobbied for the construction of a railway station. Mr Chorley and another Cheltenham resident Mr George Rattray each personally contributed one hundred pounds (almost fifty percent of the total cost) to the construction of the platforms. Not only did Mr Chorley desire a platform to avoid a horse and buggy ride to the nearest platform but it also permitted him to more readily market residential blocks on the eastern side of the railway.<sup>24</sup> The essential heritage elements of the station precinct are therefore of a small, later considered, site entirely intended as an adjunct to a purely local clientele. When opened "Mrs Chorley decorated the platform with the Union Jack and Australian flags, ferns and native flowers" not as a commercial interchange but as a personal, intimate residential siding. This is the heritage nature of this railway precinct. The images of the size and complexity of the proposed new station are entirely contrary to these heritage values. No Statement of Heritage Impact is provided to discuss any way in which the size might be modified, the design made more compatible with the heritage precinct in which it is located nor the footprint confined to its historical roots.

The report almost gives greater consideration to recent sympathetic additions to 1 and 2 Wandeen Avenue (which have no relevance to the heritage impact of the proposed development) than it does to the significant and detrimental impact on the heritage values of this precinct.

## 2.5 Cheltenham Recreation Club

The area between the Crescent and the Railway line which is currently vegetated will become a car park. Mention has previously been made of the selective use of information concerning this site. As with the Beecroft Lawn Tennis Club, the setting of these sporting facilities as an extension of the Harris family property 'Edensor' need to be considered holistically to properly address the significance of the heritage of this area. This aspect of the recreational setting is not considered by the report at all.

Within an area noted for its open space, trees and vegetation, what is proposed is a hard surface car park with minimal landscaping relief. This is not recognised as having any heritage impact. This is another significant flaw of great consequence when considering this Assessment Report.

The impact of increasing the number of railway lines by a third and increasing the quantity of diesel freight traffic on the line closest to the recreational facilities is not considered by this Assessment Report.

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<sup>24</sup> Beecroft and Cheltenham History Group *Beecroft and Cheltenham: The shaping of a Sydney community to 1914* (1995, Beecroft) p101-2

## 2.6 *Impact of the fabric of the Heritage Conservation Area*

As this report has sought to set out the Assessment Report considers the visual impact of the proposals but does not give any due consideration to other impacts, importantly vibrations and pollutants, that the proposal might have on the fabric of the heritage items and of the conservation area generally.

This impact is particularly important on sandstone monuments and houses with sandstone foundations, soft mortar and bricks, lintels and tiles, designed for a hill style settlement and not close proximity to a freight line with this degree of traffic.

This is considered to be a significant defect of the Assessment report.

This response seeks to identify some of the major thematic and individual deficiencies of the Assessment Report.



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18 October 2012

