

# Heritage (Decision about Provisional Registration of the Narrabundah Duplexes) Notice 2018

## Notifiable Instrument NI2018–174

made under the

**Heritage Act 2004, s32 (Decision about provisional registration) and s34 (Notice of decision about provisional registration)**

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### 1 Name of instrument

This instrument is the *Heritage (Decision about Provisional Registration of the Narrabundah Duplexes) Notice 2018*.

### 2 Decision about provisional registration

On 5 April 2018, the ACT Heritage Council (the **Heritage Council**) decided not to provisionally register the Narrabundah Duplexes (the **Place**).

### 3 Description of the Place

The description of the Place is in the schedule.

### 4 Reasons for the decision

The Heritage Council is not satisfied on reasonable grounds that the Place is likely to have heritage significance as defined by section 10 of the *Heritage Act 2004*. A detailed statement of reasons, including an assessment against the heritage significance criteria, is provided in the schedule.

### 5 Date decision takes effect

The decision not to provisionally register the Place takes effect on 6 April 2018 (being the day after the Heritage Council made its decision in writing as set out in the schedule).

Jennifer O’Connell  
Secretary (as delegate for)  
ACT Heritage Council  
5 April 2018



## ACT Heritage Council

### **STATEMENT OF REASONS DECISION NOT TO PROVISIONALLY REGISTER Narrabundah Duplexes**

#### **Section 39 Blocks 22-25; Section 40 Blocks 1-4; Section 41 Blocks 1-4; Section 43 Blocks 1-3, 21-25; Section 44 Blocks 34, 35, 38, 39, 51, 52, 55 and 56, Narrabundah IN THE ACT HERITAGE REGISTER**

In accordance with Section 32 of the *Heritage Act 2004*, the ACT Heritage Council has decided not to provisionally register Narrabundah Duplexes, Narrabundah. This Statement of Reasons provides an assessment of Narrabundah Duplexes, Narrabundah and finds that the place does not meet any of the criteria under s.10 of the *Heritage Act 2004*.

In assessing the Narrabundah Duplexes as a precinct, the Council has thoroughly considered the contribution of all of the component parts of the place as well as various combinations that were presented in the different nominations.

In determining heritage significance, the Council must first determine whether a place or object has value in relation to a criterion (applying a basic test), and then apply threshold indicators, to ‘test’ the degree to which the place or object is significant and hence whether it meets a criterion and warrants registration.

Throughout the assessment detailed below, the Council applied threshold indicators, and found that the various attributes of heritage significance considered have not passed the thresholds for any of the significance criteria; however, the Council have also considered all of these attributes as a collective feature and have found that the place still does not meet the threshold for any of the significance criteria.

After careful deliberation, weighing up arguments for and against, and considering the development of the place in history as well as its lasting legacy, the Council has determined that, on balance, the Narrabundah Duplexes does not have sufficient evidence that demonstrates heritage values beyond a local level that would allow it to pass the basic tests or thresholds to meet the heritage significance criteria as set out in s.10 of the *Heritage Act 2004*, which is the test for whether a place has significance for the ACT as a whole as required for registration.

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This statement refers to the location of the place as required in s.34(5)(b)(ii) of the *Heritage Act 2004*.

#### **LOCATION OF THE PLACE**

Narrabundah Duplexes, along Sturt Avenue and Boolimba Crescent, Section 39 Blocks 22-25; Section 40 Blocks 1-4; Section 41 Blocks 1-4; Section 43 Blocks 1-3, 21-25; Section 44 Blocks 34, 35, 38, 39, 51, 52, 55 and 56, Narrabundah.

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This section refers to the description of the place as required in s.34(5)(b)(iii) of the *Heritage Act 2004*. The boundary of the place and extent of features listed below is illustrated at Image 1.

#### **DESCRIPTION OF THE PLACE**

Narrabundah Duplexes, also known as the ‘Old’ Narrabundah Duplexes, consisting of the following attributes:

- The building and landscaping features associated with the blocks listed in “Location of the Place” and the associated streetscapes along Sturt Avenue and Boolimba Crescent.

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This statement refers to the Council's reasons for its decision as required in s.34(5)(b)(iv) of the *Heritage Act 2004*.

### REASONS FOR DECISION

The Council is not satisfied on reasonable grounds that the place is likely to have heritage significance as defined by s.10 of the *Heritage Act 2004*.

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This statement refers to the Council's assessment of the place against the heritage significance criteria as a part of its reasons for its decision as required in s.34(5)(b)(iv) of the *Heritage Act 2004*.

### ASSESSMENT AGAINST THE HERITAGE SIGNIFICANCE CRITERIA

The Council's assessment against the criteria specified in s.10 of the *Heritage Act 2004* is as follows.

In assessing the heritage significance of Narrabundah Duplexes, Narrabundah, the Council considered:

- the original nomination and documentary evidence supplied by the two separate nominators;
- the Council's *Heritage Assessment Policy* (February 2015);
- information provided by site inspections on 7 September 2015 by ACT Heritage and 1 February 2016 by Council members;
- the report by ACT Heritage titled, *Background Information Narrabundah Duplexes*, February 2018, containing photographs and information on history, description, condition and integrity; and
- Documents provided for ACT Civil and Administrative Tribunal hearing AT 34/2015 - OLD NARRABUNDAH COMMUNITY COUNCIL INC v ACT PLANNING AND LAND AUTHORITY & ORS (Administrative Review) [2016] ACAT 32

Pursuant to s.10 of the *Heritage Act 2004*, a place or object has heritage significance if it satisfies one or more of the following criteria. Future research may alter the findings of this assessment.

**(a) importance to the course or pattern of the ACT's cultural or natural history;**

The Council has assessed Narrabundah Duplexes against criterion (a) and is satisfied that the place does not meet this criterion.

The Narrabundah Duplexes are not considered to be of a high enough importance to the course or pattern of the ACT's cultural history to meet the threshold for inclusion under this criterion. The era in the ACT's history that is represented in the nominated place is important for the post-war transfer of public servants to the seat of government and the need to provide adequate subsidised housing to encourage the move. As this period is marked by a rapid increase in the transfer of personnel and a corresponding rapid increase of housing, it is represented across much of the central Canberra area and early suburbs. Earlier provision of government housing of various types can be found in the registered Garden City Precincts, particularly the Blandfordia 5 and Reid Housing Precinct which include several brick duplexes. The use of duplexes in the government provision of housing continued from 1927 and has always been one of the many different types of housing that was provided to meet the various needs of different occupants.

There was a large number of duplexes, and other medium to high density housing, built in the post-war period, reflecting the changing demands for housing in the ACT and the planning and social policies of the time. This is an important aspect of the ACT's cultural history, however the Council has determined that there are other examples in the ACT that are of a higher importance and consequently the Narrabundah Duplexes do not meet the threshold for this criterion.

**(b) has uncommon, rare or endangered aspects of the ACT's cultural or natural history;**

The Council has assessed Narrabundah Duplexes against criterion (b) and is satisfied that the place does not meet this criterion.

The Narrabundah Duplexes are not, or do not contain, aspects of the ACT's cultural history that are uncommon, rare or endangered.

Duplexes are a standard type of government housing for the time. The designs used for government housing were based on standardised designs with slight variations that were given different design numbers, e.g. the 200-series duplex designs had several models with minor variations that were assigned different numbers such as the 282, 283, 284, and 285 (which are all represented in the nomination). Even though there are differences between different model numbers, these cannot be considered to be a significant factor in defining the kind of place as the addition of such minor qualifiers renders the level of division to be meaningless. There is no evidence before the Council that any of these designs are particularly significant in their own right or are uncommon, rare or endangered. At this time, as a class of place, i.e. post-war government housing duplexes, they are not considered to be uncommon, rare or endangered as there are many examples across the ACT, including those in the heritage registered Reid Housing Precinct, Griffith, Ainslie and Kingston.

The palette of materials and form evident in the construction of the duplexes (i.e. the Canberra red bricks, hipped tiled rooves and timber door and window frames) is widespread throughout Canberra and typical of the approach to housing of the era/early Canberra. Further, the use of a limited number of floor plans or house types with subtle or slight variations is also typical of the approach to government housing. Other examples demonstrating this approach include the Riley Newsoms, particularly in Ainslie, O'Connor and Narrabundah; the Tocumwals in O'Connor and the Federal Capital Commission (FCC) and Department of Interior (DOI) houses in Ainslie, Barton, Braddon, Reid, Griffith, Forrest and Kingston. Unity was achieved by the limited palette of materials whilst some interest and variation was achieved by slight differences in floor plans/types.

The planning evident in the layout of the Narrabundah Duplexes that forms an entry portal to that part of Narrabundah is an interesting aspect of the place, but there is no evidence that it has made a noticeable or influential contribution to the ACT's development. As noted in the *Heritage Assessment Policy* being uncommon, rare or endangered is a basic test for applying this criterion, but the aspect also needs to be significant or important to the ACT to reach the threshold for meeting the criterion, otherwise application of this criterion would be untenable. A significant portion of the suburb of Narrabundah was developed as government housing at the same time, and it is not unusual that a unified design was developed; this was a concept that had been used from the first suburbs to be developed utilising Garden City planning principles. On the northern side of Boolimba Crescent the 'portal' concept has been compromised by the construction of single storey dwellings. The two main dwellings that act as the gateway, Section 43 Block 1 and Section 44 Block 55 (i.e. the corner blocks flanking the Boolimba Crescent entrance from Sturt Avenue), have unsympathetic additions that disrupt the visual harmony that may have been achieved by having otherwise identical buildings. Other extant and more intact examples of government housing with higher level planning exist in the Red Hill Public Housing Precinct and the Northbourne Housing Precinct. Additionally, the use of duplexes as a transition between different areas within and between suburbs is a common theme in their use from 1927 when the Blandfordia 5 duplexes were located between the Manuka Shopping Precinct and the lower density residential parts of Blandfordia, through to post-war and modern times where they are placed along major roads and edges of suburbs.

**(c) potential to yield important information that will contribute to an understanding of the ACT's cultural or natural history;**

The Council has assessed Narrabundah Duplexes against criterion (c) and is satisfied that the place does not meet this criterion.

The Narrabundah Duplexes are based on standard designs that have been conserved in the National Archives of Australia and Archives ACT. Additionally the planning of the place, layout designs and discussions contained in meeting minutes, are also conserved in various archives. As these records are adequately conserved in archival records, the Council does not consider that the Narrabundah Duplexes have the potential to yield any more important information that will contribute to an understanding of the ACT's cultural history.

**(d) importance in demonstrating the principal characteristics of a class of cultural or natural places or objects;**

The Council has assessed Narrabundah Duplexes against criterion (d) and is satisfied that the place does not meet this criterion.

The Narrabundah Duplexes exhibit characteristics of post-war government housing duplexes, however the Council does not consider them important in demonstrating these characteristics for this class of place. The main reason this criterion is not considered to be met is that the importance of this class of place in the ACT's cultural history, and the Narrabundah Duplexes ability to represent this very common class, is not considered to have made a strong, noticeable or influential contribution as noted in the *Heritage Assessment Policy*.

Additionally, the overall two-storey form and face brick appearance of the duplexes remains; however, overall integrity and sense of entity has been diminished through alterations to the original design intent. The alterations include the addition of retractable awnings to windows; solar panels to the roof; air conditioning units; the addition of garages and carports at locations visible from the street; mesh panel, brush, timber paling and slat and Colorbond fencing visible from the street; courtyard walls visible from the street; and mixed landscaping treatment to each half of a duplex. The presence of these elements is reflective of the changing needs of residents over time but has had the effect of a loss of symmetry between the entrance portal blocks, neighbouring duplexes and in some case between the two houses making a single duplex. The visual harmony that may have been achieved by a consistent and unified approach to landscape treatment has also been compromised, particularly where existing landscaping obscures the view of the duplex from the immediate streetscape and equally where the absence of any landscaping provides a stark contrast. Significantly more intact examples of duplexes from the same period exist in Throsby Court.

**(e) importance in exhibiting particular aesthetic characteristics valued by the ACT community or a cultural group in the ACT;**

The Council has assessed Narrabundah Duplexes against criterion (e) and is satisfied that the place does not meet this criterion.

There is insufficient evidence before the Council, to demonstrate that the Narrabundah Duplexes exhibit particular aesthetic characteristics which are valued by the ACT community or a cultural group.

The Council recognises that the social significance assessment provided by the nominator indicates that several people, particularly past and present residents of the Narrabundah Duplexes and surrounding houses, value the place for aesthetic and other reasons. However, it is unclear how much this value is held by those without an immediate association with the place. While valued by the 'Old' Narrabundah Community Council Inc. (ONCC), and some current and previous tenants, the Council's *Heritage Assessment Policy* interprets a cultural group as a 'group of people within a society with a shared ethnic or cultural background' or 'a group of people connected through the same way of living, which has been transmitted from one generation to another'. The Council therefore does not consider the ONCC to be a cultural group for the purposes of the criterion. Additionally, as a local Narrabundah community organisation, including past and current tenants, they do they represent the broader ACT community.

Boolimba Crescent was identified as one of approximately 125 significant streetscapes across Canberra (and one of 10 within Narrabundah) by the ACT planning and land authority for their existing mature street trees and general landscape character. The list of significant streetscapes was established in the early 2000's, however it has no statutory role. Further, since that time the streetscape has changed markedly. Whilst the Council acknowledges the amenity of the streetscape and that the form and materials of the duplexes may contribute to the streetscape and landscape character of the area, the value of this aesthetic to the broader ACT community has not been established as required by the *Heritage Assessment Policy*.

**(f) importance in demonstrating a high degree of creative or technical achievement for a particular period;**

The Council has assessed Narrabundah Duplexes against criterion (f) and is satisfied that the place does not meet this criterion.

As noted in criterion (b), the Narrabundah Duplexes are based on standard designs that have been repeated throughout the ACT and the planning of the place does not demonstrate a high degree of creative or technical achievement in the siting of the buildings and the creation of a 'portal' into the suburb.

**(g) has a strong or special association with the ACT community, or a cultural group in the ACT for social, cultural or spiritual reasons;**

The Council has assessed Narrabundah Duplexes against criterion (g) and is satisfied that the place does not meet this criterion.

No evidence has been presented for the Narrabundah Duplexes that demonstrates a strong or special association with the ACT community, or a cultural group in the ACT for social, cultural or spiritual reasons.

While valued by the ONCC and some current and previous tenants, the Council's *Heritage Assessment Policy* interprets a cultural group as a 'group of people within a society with a shared ethnic or cultural background' or 'a group of people connected through the same way of living, which has been transmitted from one generation to another'. The Council therefore does not consider the ONCC to be a cultural group for the purposes of the criterion. As a local community organisation, including past and current tenants, they do not represent the ACT community. The social values attributed to the duplexes have not been established within the broader context of the ACT community as required by the *Heritage Assessment Policy*.

**(h) has a special association with the life or work of a person, or people, important to the history of the ACT.**

The Council has assessed Narrabundah Duplexes against criterion (h) and is satisfied that the place does not meet this criterion.

While a number of people have been involved in the planning, design and construction of the Narrabundah Duplexes and many more have lived in them, no associations have been demonstrated between the place and people important to the ACT that may be considered to be special. The National Capital Planning and Development Committee (NCPDC) was responsible for the planning of the area and noted that special treatment was required for several points in the suburb, including the Narrabundah Duplexes along the entry junction to the principal access road as accented two-storey pairs. While this was called 'special treatment', it is considered to be minor in the overall planning of the ACT and it is not considered to be sufficient for a special association between the place and the NCPDC. There is no evidence that the Narrabundah Duplexes have a special association with the life or work of a person, or people, important to the history of the ACT.

# SITE PLAN



**Image 1** Narrabundah Duplexes nominated blocks, incorporating all variations of the place included in nominations (note: the boundary includes the associated streetscapes along Sturt Avenue and Boolimba Crescent)