



IRF22/3597

## Gateway determination report – PP-2022-3365

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Proposal to list Headfort House, 95 Stanhope Road,  
Killara, as a local heritage item

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# Acknowledgment of Country

The Department of Planning and Environment acknowledges the Traditional Owners and Custodians of the land on which we live and work and pays respect to Elders past, present and future.

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**Table 1 Reports and plans supporting the proposal**

Relevant reports and plans
Planning Proposal – September 2022
Headfort House Heritage Assessment Review, Ku-ring-gai Council – September 2022
Headfort House Heritage Significance Assessment, GML Heritage – May 2017
Ku-ring-gai Council OMC Report – 26 July 2022

# 1 Planning proposal

## 1.1 Overview

Table 2 Planning proposal details

LGA	Ku-ring-gai
PPA	Ku-ring-gai Council
NAME	Local heritage listing of 95 Stanhope Road, Killara, known as 'Headfort House'
NUMBER	PP-2022-3365
LEP TO BE AMENDED	Ku-ring-gai Local Environmental Plan 2015 (KLEP 2015)
ADDRESS	95 Stanhope Road, Killara (Lot 22 DP 634645)
DESCRIPTION	Listing of 95 Stanhope Road, Killara, as a local heritage item and amendment of the Heritage Map to identify the site as a heritage item.
RECEIVED	20/09/2022
FILE NO.	<a href="#">IRF22/3545</a>
POLITICAL DONATIONS	There are no donations or gifts to disclose and a political donation disclosure is not required
LOBBYIST CODE OF CONDUCT	There have been no meetings or communications with registered lobbyists with respect to this proposal

## 1.2 Objectives of planning proposal

The planning proposal contains objectives and intended outcomes that adequately explain the intent of the proposal.

The objectives of the planning proposal are to list the Headfort House Chapel, building, interiors and grounds as a local heritage item, consistent with the findings of the Heritage Assessment Review by Ku-ring-gai Council (**Attachment B**) and Heritage Significance Assessment 2017 by GML Heritage (**Attachment C**).

The objectives of this planning proposal are clear and adequate.

## 1.3 Explanation of provisions

The planning proposal seeks to amend the KLEP 2015 to:

- insert a local heritage listing for 'Headfort House Chapel, building, interiors and grounds' at 95 Stanhope Road, Killara, in Part 1 *Heritage items* of Schedule 5 *Environmental Heritage*
- amend the Heritage Map to identify the land containing 'Headfort House' (Lot 22 DP 634645) as a heritage item.

The planning proposal contains an explanation of provisions that adequately explains how the objectives of the proposal will be achieved.

## 1.4 Site description and surrounding area

The site is located at the north-west corner of 95 Stanhope Road, Killara, within the Lourdes Retirement Village, 95-97 Stanhope Road (subject to planning proposal PP-2022-658) (**Figure 1**). The site is legally described as Lot 22 DP 634645 and contains a two-storey inter-war period style Chapel building, called Headfort House, dating from around 1917-1921.



**Figure 1 Subject site shown in red (source: GML Heritage Significance Assessment)**

Headfort House (north elevation) (**Figure 2**) fronts Stanhope Road, although the former pathway and gate access from Stanhope Road has been removed. The rear (southern elevation) of the building adjoins a two-storey building providing storage for the retirement village.

The site is not listed as a heritage item, although a section of the north-west corner of the Lourdes site is listed in heritage conservation area (HCA) (**Figure 3**).

The building demonstrates inter-war Old-English architecture through its relatively restrained ornamentation, domestic scale and asymmetry of the building form. The north elevation (**Figure 2**) contains a double roof gable and masonry with painted stucco finish external walls, with framed wall panels below the windows. The detailing of the entry porch is shown in a 1920s photograph of the building. The west elevation (**Figure 4**) is similarly stucco and paint finished, with timber-boarded eaves and raking with expressed timber rafters.

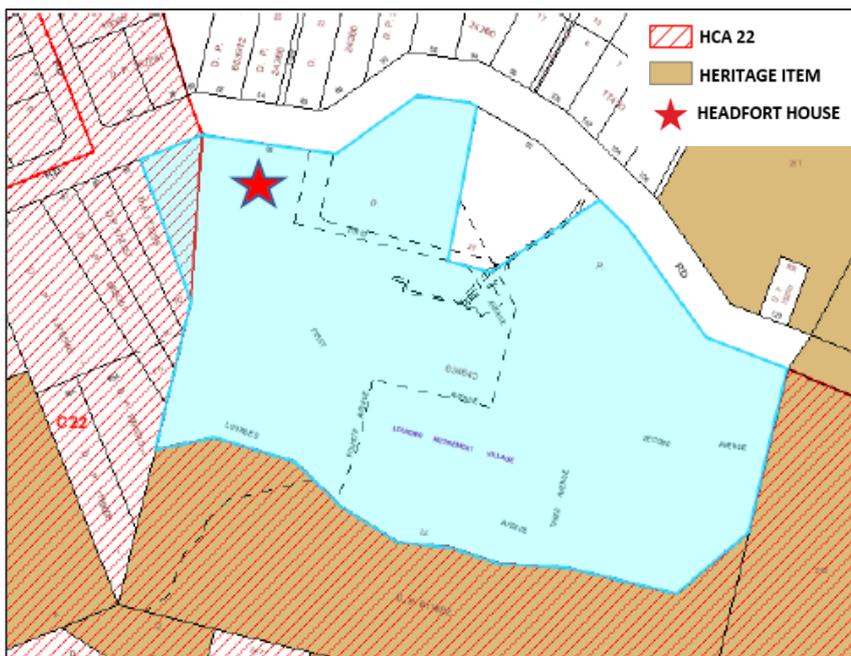


**Figure 2 Front (north) elevation of Headfort House, 95 Stanhope Road (Source: GML 2017)**

The area surrounding the site comprises low-density residential suburban and bushland. The nearest strategic centre is Chatswood (4.7km away) and the closest local centre is Lindfield (2.4km away).

The following heritage items and HCA (**Figure 3**) are located within the surrounding context:

- Item I1100 – Seven Little Australians Park (being the western part of former Lindfield Park)
- Item I1103 – Swain Gardens
- Item C22 – Crown Blocks Conservation Area.



**Figure 3 Heritage map showing nearby Crown Blocks HCA and Heritage items (Source: Planning Proposal)**



**Figure 4 West Elevation of Headfort House, south facing (Source: GML 2017)**



**Figure 5 Entry lobby of Headfort House (Source: GML 2017)**



**Figure 6 Chapel of Headfort House, facing east (Source: GML 2017)**



**Figure 7 Chapel of Headfort House, facing west (Source: GML 2017)**

# 1.5 Mapping

The planning proposal includes mapping (**Figure 8 and 9**) showing the proposed changes to the heritage map, to identify the location of the proposed local heritage item. The proposed mapping in the planning proposal is considered suitable for community consultation.

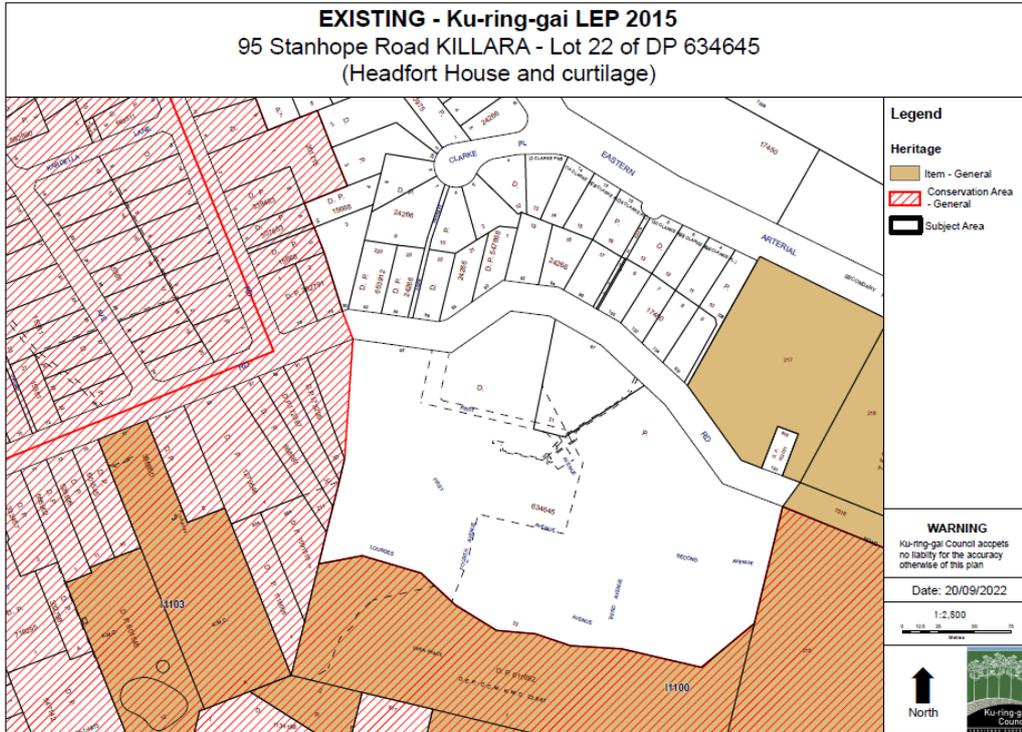


Figure 8 Current Heritage map

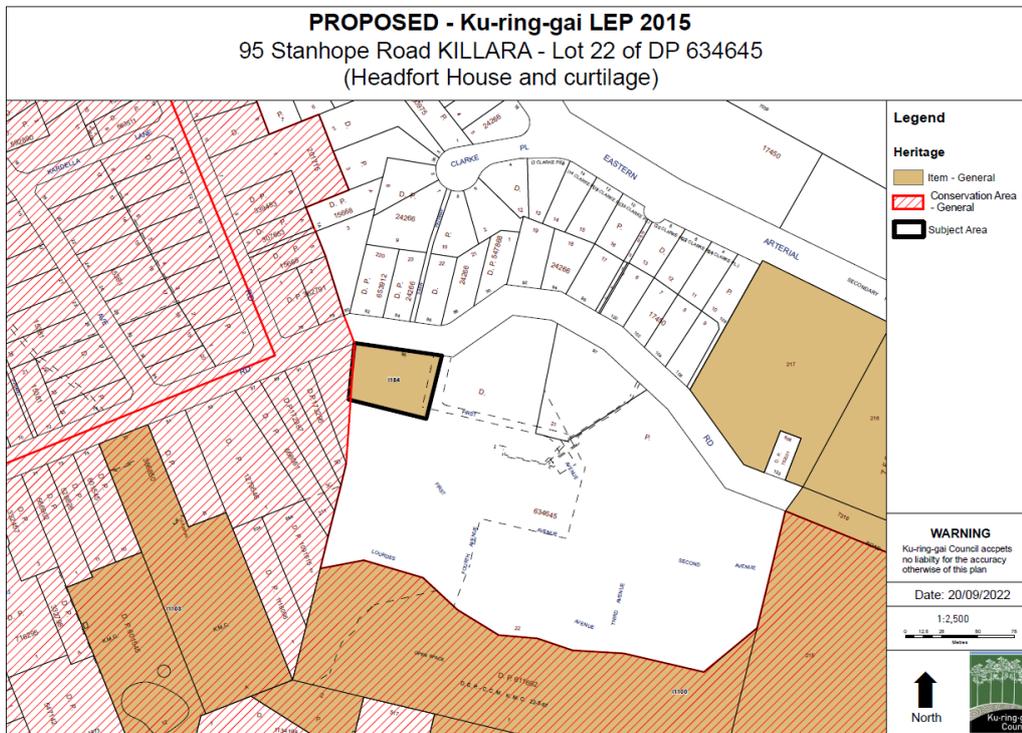


Figure 9 Proposed Heritage map

## 1.6 Background

The following timeline provides the background to the planning proposal:

- 7 December 2016 – At the pre planning proposal meeting for 95-97 Stanhope Road (PP-2022-658), Council recommended the heritage listing of Headfort House
  - 2 February 2018 – While the planning proposal for 95-97 Stanhope Road (PP-2022-658) did not include the Headfort House heritage listing as recommended, it did include the attached Heritage Significance Assessment 2017, prepared by GML (**Attachment D**)
  - 22 May 2018 – Council refused to progress the 95-97 Stanhope Road Planning Proposal (PP-2022-658). However, Council’s Ordinary Meeting of Council (OMC) report recommended to heritage list Headfort House and consider heritage values in any future proposals.
  - 10 May 2022 – The Department issued a Gateway determination for the 95-97 Stanhope Road Planning Proposal (PP-2022-658) to proceed to exhibition, which while not proposing the heritage listing of Headfort House, included exhibition of the Heritage Significance Assessment 2017, prepared by GML.
- 26 July 2022 – Council’s OMC resolved that Council would prepare a planning proposal and heritage assessment report, to amend the KLEP 2015 to list Headfort House as a local heritage item.

## 2 Need for the planning proposal

This planning proposal is the result of Council’s intension for the potential local heritage listing of the site at 95 Stanhope Road, Killara, which is informed by the findings of the Heritage Significance Assessment (prepared by GML in 2017) and Council’s Heritage Assessment Review.

The planning proposal seeks to list the site, including building, interiors and grounds, as a local heritage item to enable the ongoing conservation of the item and its heritage value.

Further, Council considers that a planning proposal is the only means to alter Part 1 Schedule 5 of the *KLEP* 2015 to provide statutory protection for the site, by listing it as being of local heritage significance.

### Assessment of heritage significance

Council have assessed the proposed heritage item against the NSW Heritage Office Guideline, and notes that the proposed listed meets 6 of the 7 criteria for listing (**Table 3**).

**Table 3 Heritage assessment of site against NSW Heritage Office guideline**

Site	Criterion	Consideration	Consistent
Headfort House, 95 Stanhope Road, Killara	<p><b>(a) Historic Significance</b></p> <p>An item is important in the course, or pattern, of NSW’s cultural or natural history (or the cultural or natural history of the local area);</p>	<ul style="list-style-type: none"> <li>• NSW’s first training base for the Australian Army for the Australian Women’s Army Service (AWAS) during World War II.</li> <li>• Displays post-war transition of educational institutions to hospitals - being for the Missionary Sisters of the Society of Mary (MSSM) Lourdes Hospital.</li> <li>• Depicts the evolution of the site as a health care facility, from the treatment of the tuberculosis epidemic for SMSM, to Mater Misericordia Hospital from 1967, and Lourdes Retirement Village from the 1980s till present.</li> </ul>	

Site	Criterion	Consideration	Consistent
	<p><b>(b) Association Significance</b></p> <p>An item has strong or special association with the life or works of a person, or group of persons, of importance in NSW's cultural or natural history (or the cultural or natural history of the local area)</p>	<ul style="list-style-type: none"> <li>Reverend Robert Thompson Wade was the founder of the Headfort school in 1918 and known for his contributions to Ichthyology, Palaeontology and education.</li> <li>Former Prime Minister John Gorton attended the Headfort School for two years during his schooling years (as such not applicable for exclusion from this criterion due to an incidental connection with historically important people).</li> </ul>	
	<p><b>(c) Aesthetic Significance</b></p> <p>An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (or the local area)</p>	<ul style="list-style-type: none"> <li>Built in the inter-war period (c1915-1940) represents a distinctive adaptation of the inter-war Old English Style as an institutional building in a predominantly residential area.</li> <li>Inter-war old English style shown through its domestic scale, asymmetry of the built form, vertical proportions of the projecting gables, fine internal timber joinery and the high-waisted panelled doors.</li> </ul>	
	<p><b>(d) Social Significance</b></p> <p>An item has strong or special association with a particular community or cultural group in NSW (or the local area) for social, cultural or spiritual reasons</p>	<ul style="list-style-type: none"> <li>Associated with various groups over the years, including the Eastern Command of the AWAS from 1942-1944, the MSSM – who established Lourdes Hospital in 1944, and currently through its association with Ku-ring-gai community's local character as a retirement village.</li> </ul>	
	<p><b>(e) Research Potential</b></p> <p>An item has potential to yield information that will contribute to an understanding of NSW's cultural or natural history (or the cultural or natural history of the local area)</p>	<ul style="list-style-type: none"> <li>KRG and the GML heritage assessments do not identify the site as having research potential - having little archaeological or research potential – particularly due to potential lost through extensive building works associated with the development of the Lourdes Retirement Village.</li> </ul>	
	<p><b>(f) Rarity</b></p> <p>An item possesses uncommon, rare or endangered aspects of NSW's cultural or natural history (or the cultural or natural history of the local area);</p>	<ul style="list-style-type: none"> <li>The property's rarity can be attributed to the site having evidence for being the first Australian Women's Army Service Training site in NSW for WWII. The extant building and grounds used for such purposes, still exist today.</li> <li>Historic photographs dating back to the 1940s - held at the Australian War Memorial and State Library - showcase the women's army training.</li> </ul>	

Site	Criterion	Consideration	Consistent
	<p><b>(g) Representativeness</b></p> <p>An item is important in demonstrating the principal characteristics of a class of NSW's or a local area's cultural or natural places or cultural or natural environments.</p>	<ul style="list-style-type: none"> <li>Representative of groups such as purpose-built inter-war school buildings, buildings constructed during/around wartime, buildings converted for wartime training, and hospital conversions of buildings post-war.</li> <li>Evidence exists through photographs of women's wartime training on site.</li> <li>The building's restrained ornamentation reflects its school use and wartime construction era.</li> </ul>	

## 3 Strategic assessment

### 3.1 Regional Plan

The following table provides an assessment of the planning proposal against relevant aspects of the Greater Sydney Regional Plan: *A Metropolis of Three Cities*.

**Table 4 Regional Plan assessment**

Regional Plan Objectives	Justification
13: Environmental heritage is identified, conserved, and enhanced	<p>The Regional Plan emphasises the need to conserve items of heritage significance. Environmental heritage should be protected for its social, aesthetic, economic, historic, and environmental values.</p> <p>The heritage assessments by GML and KRG note the site has local heritage values in accordance with the NSW Heritage Office Guidelines.</p> <p>The proposal is consistent with the objectives of the Regional Plan, as it seeks to recognise the heritage significance and facilitate ongoing protection of the site.</p>

### 3.2 District Plan

The site is within the North District and the former Greater Sydney Commission (now the Greater City Commission) released the North District Plan on 18 March 2018. The plan contains planning priorities and actions to guide the growth of the district while improving its social, economic and environmental assets.

The planning proposal is consistent with the priorities for liveability in the plan as outlined below.

The Department is satisfied the planning proposal gives effect to the District Plan in accordance with section 3.8 of the *Environmental Planning and Assessment Act 1979*. The following table includes an assessment of the planning proposal against relevant directions and actions.

**Table 5 District Plan assessment**

District Plan Priorities	Justification
N6: Creating and renewing great places and local centres, and respecting the District's heritage  Objective 13: Environmental heritage is identified, conserved, and enhanced.	This priority seeks to identify, conserve, interpret, and celebrate Greater Sydney's heritage values.  The proposal seeks to protect the district's heritage by local heritage listing the site in the KLEP, thus providing greater certainty for the building's conservation and management into the future.  The proposal is considered to be consistent with the District Plan.

### 3.3 Local

The proposal states that it is consistent with the following local plans and endorsed strategies. It is also consistent with the strategic direction and objectives, as stated in the table below:

**Table 6 Local strategic planning assessment**

Local Strategies	Justification
Ku-ring-gai Local Strategic Planning Statement (LSPS)	Planning Priority K13: Identifying and conserving Ku-ring-gai's environmental heritage.  The planning proposal is consistent with this priority as the proposal seeks to conserve an item of environmental heritage significance within the Ku-ring-gai LGA.  The proposal is consistent with the objectives of the LSPS.
Ku-ring-gai Heritage Strategy 2021	Priority 4.2: Review existing and identify new heritage items and HCAs  The planning proposal is consistent with this priority as it seeks to assess and identify Headfort House as a new heritage item, to ensure the environmental, social, end economic benefits of this asset is realised into the future.  The proposal is consistent with the priorities of the Ku-ring-gai Heritage Strategy.

### 3.4 Section 9.1 Ministerial Directions

The planning proposal's consistency with relevant section 9.1 Directions is discussed below:

**Table 7 9.1 Ministerial Direction assessment**

Directions	Consistent / Not Applicable	Reasons for Consistency or Inconsistency
1.1 Implementation of Regional Plans	Yes	This Direction is relevant to the proposal as it seeks to give effect to the directions of the North District Plan.  As the proposal is consistent with the North District Plan, the proposal is consistent with this Direction.

Directions	Consistent / Not Applicable	Reasons for Consistency or Inconsistency
3.3 Heritage Conservation	Yes	<p>This Direction is relevant as it seeks to conserve items of environmental heritage significance. It ensures that a proposal contains provisions to facilitate the conservation of items assessed to be of heritage significance.</p> <p>The planning proposal has identified the site's environmental heritage significance through an assessment in accordance with the NSW Heritage Office guidelines (<b>Table 3</b>). The proposal aims to ensure the ongoing protection of the site through a local heritage listing in the KLEP.</p> <p>Therefore, the proposal is consistent with this Direction.</p>
6.1 Residential Zones	Yes	<p>This Direction is relevant as the site is situated within an existing residential zone (R2).</p> <p>The proposal does not seek to alter the existing residential zoning or development standards applying to the site.</p> <p>Listing the site as a local heritage item would enable any future development application for the site to be assessed against the provisions of Clause 5.10 <i>Heritage Conservation</i> per the Ku-ring-gai LEP 2015.</p> <p>The proposal is consistent with this Direction.</p>

### 3.5 State environmental planning policies (SEPPs)

The planning proposal is consistent with all relevant SEPPs.

## 4 Site-specific assessment

### 4.1 Environmental

The planning proposal seeks to facilitate the statutory protection and conservation through a local heritage listing, which is informed by heritage assessments by Ku-ring-gai Council and GML. The proposed heritage item has also been assessed against the criteria for listing in the NSW Heritage Office Guidelines (**Table 3**).

Based on the above, the Department is satisfied that the proposal will not have any adverse effects on any critical habitat, species, ecological communities or their populations.

### 4.2 Social and economic

The following table provides an assessment of the potential social and economic impacts associated with the proposal.

**Table 10 Social and economic impact assessment**

Social and Economic Impact	Assessment
Social	<p>The planning proposal is unlikely to have any significant or adverse social impacts. Listing the site as a heritage item will provide increased certainty regarding the ongoing protection of a historically significant item. The site has shown to possess social significance to a variety of groups and for various educational and health purposes over the years (<b>Table 3</b>).</p> <p>Through community consultation, the wider community will have an opportunity to voice their views regarding the appropriateness of the site as a local heritage item.</p>
Economic	<p>The proposal is not expected to generate any notable economic impacts. Any future development application will need to consider the heritage context of the building and its curtilage, pursuant to Clause 5.10 of <i>the Ku-ring-gai LEP 2015</i>. The proposal does not seek to alter existing zoning or development standards.</p> <p>The economic impact is considered reasonable for the given proposal.</p>

## 4.3 Infrastructure

The planning proposal does not require any changes to existing infrastructure, or further infrastructure provision. The proposal will neither generate additional demand for infrastructure nor does it facilitate intensified development on the subject site, as there are no changes to zoning or other development standards.

## 5 Consultation

### 5.1 Community

Council proposes a community consultation period of 14 days.

This timeframe is consistent with the Department's *Local Environmental Plan Making Guideline 2021* (LEP Making Guideline) timeframe of 10 working days for a basic planning proposal. A Gateway condition has been included to require the planning proposal be exhibited for 10 working days, consistent with the benchmark timeframes in the Guideline.

### 5.2 Agencies

It is not recommended that any agencies be consulted on the planning proposal.

## 6 Timeframe

Council proposes a six month time frame to complete the LEP.

The Department supports this request as it will ensure the planning proposal is completed in line with its commitment to reduce processing times.

A condition to the above effect is recommended in the Gateway determination.

## 7 Local plan-making authority

Council has requested delegation to be the Local Plan-Making authority.

The Department supports this request as it relates to a site of local heritage significance.

## 8 Assessment summary

The planning proposal is supported to proceed with conditions for the following reasons:

- It is supported by two heritage assessment reports (by Council and GML) that identify the site as satisfying the criteria for being of local heritage significance (In Accordance with NSW Heritage Office Guidelines).
- The proposal is consistent with the directions and aims of the strategic planning framework on a regional, district and local level, as well as Section 9.1 Ministerial Directions.
- The proposal has strategic merit as it provides ongoing protection for an environmental heritage asset.

## 9 Recommendation

It is recommended the delegate of the Minister determine that the planning proposal should proceed subject to the following conditions:

1. The planning proposal should be made available for community consultation for a minimum of 10 working days.
2. The timeframe for completing the LEP is six months from the date of the Gateway determination.
3. Council should be authorised to be the local plan-making authority.



19/10/2022

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