

**ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000**

URBIS.COM.AU
Urbis Pty Ltd
ABN 50 105 256 228

21 November 2022

Natalie Vaughan
Project Director
Essence Project Management Pty. Ltd.
By email: nvaughan@essencepm.com.au

Dear Ms Vaughan,

RE: PLANNING PROPOSAL - HERITAGE LISTING OF HEADFORT HOUSE, 95 STANHOPE ROAD, KILLARA (REFERENCE NO# S13801-1)

Council has initiated a Planning Proposal (PP) to list Headfort House, at 95 Stanhope Road, Killara as a heritage item and include Headfort House in Schedule 5 of the Ku-ring-gai Local Environmental Plan 2015. The PP was initiated in response to the recent exhibition of Stockland/EQT's Planning Proposal for 95-97 Stanhope Road, Killara (Lourdes Retirement Village), seeking changes to zoning, height and floor space ratio. Council has previously requested the Headfort House listing be included in the proponent-led planning proposal to ensure its ongoing conservation and consideration in any future development of the site, however, the Stockland/EQT Planning Proposal did not include the listing of Headfort House as a heritage item.

The Ku-ring-gai Council PP is on exhibition and the following is provided in response to the PP (reference no. S13801-1). In preparing this response, Urbis has reviewed relevant PP documentation including (but not limited to):

- *Ku-ring-gai Council Planning Proposal to heritage list Headfort House, 95 Stanhope Road, Killara under Schedule 5 of the Ku-ring-gai Local Environmental Plan 2015, September 2022*
- *Headfort House, 95 Stanhope Road, Killara, Heritage Significance Assessment. Report prepared by GML for Stockland, May 2017*
- *Proposed Heritage Listing – Headfort House, Stanhope Road, Killara, Ordinary Meeting of Council, 26 July 2022 Item GB.20*
- *Headfort House Heritage Assessment Review, 95 Stanhope Road, Killara, Claudine Loffi, Ku-ring-gai Council, September 2022*

The following is also informed by a site inspection undertaken by Urbis representatives on 18/11/2022. This was a visual inspection only, for the purposes of determining the buildings integrity and changes that have been undertaken. The inspection was non-invasive. Roof spaces and sub-floors were not inspected. Urbis previously prepared a Heritage Impact Statement that was submitted with the Stockland/EQT Planning Proposal (dated 16/06/2021). That report did not assess the heritage significance of the place but relied upon the previous assessment prepared by GML (2017) referenced above.

The following submission is provided to recommend against the proposed heritage listing.

THE SITE

The subject site is known as 95 Stanhope Road, Killara, and forms part of a larger lot described as - Lot 22, DP 634645. The site is located 1.2km from Killara train station on the border between the suburbs of Killara and Lindfield. The predominant surrounding land-use is low density residential consisting of high value established detached dwellings. The built form on the site comprises mostly 1-2 storey brick buildings, with larger footprint buildings such as the administration centre and aged care facility.



Figure 1 Plan of the Lourdes Retirement Village, with the subject Headfort House shown in pink.

Source: [Lourdes Retirement Village, 95 Stanhope Rd Killara, Urban Design Report to Support Planning Proposal, prepared for Stockland by Plus Architecture 08/06/2021]

The subject site is built over an area of 52,906m and includes an administration centre, chapel, an 83-bed residential aged care facility (RACF), 49 serviced apartments, lodge, parking facility and serviced apartment buildings as well as 108 independent living units. The retirement village is located adjacent to the Garigal National Park and the Seven Little Australians Park (the western part of the former Lindfield Park). Lourdes Retirement Village was constructed in 1983 and much of the development

within the retirement village dates to this period, with the exception of the subject Headfort House, located at the northwest corner of the site and presently used as a chapel and administration building.

The Lourdes Retirement Village has been constructed largely on the former grounds of the Headfort School. Headfort House is the former school building and was constructed c.1917. Although the original form is discernible, the building has been subject to alterations and additions, including conversion of the east wing for the chapel in the 1980s. An administration wing has been added to the rear.

The northern portion of the site is defined by its suburban interface along Stanhope Road with residential development adjoining the site to the north and west. The surrounding area is characterised by large lot residential dwellings with generous garden set backs, and leafy tree-lined streets. Houses on Stanhope Road are single or two storey free standing houses, typically of inter-war construction, with some contemporary overlay. Houses are typically facebrick and set within landscaped gardens. The adjacent HCA is characterised by intact Federation and Inter-war houses, with some examples of mid to late twentieth century development.

Headfort House

The following description is summarised from the Inventory listing prepared by Ku-ring-gai Council.¹

Headfort House is a one-two storey masonry building, with pitched tiled roofs. The two-storey parts of the building comprise the main part of the building the original Headfort schoolhouse constructed 1917-1918 and the present chapel wing constructed between 1918 and 1921 and converted into a chapel in the 1980s. The garage to the west was dates from 1926. The single storey ancillary rooms to the chapel on its south and east sides date from the 1980s.

The architecture of the main part of the building represents the inter-war Old English style, adapted to an institutional building instead of the more common residential examples of this style. It is relatively austere in its construction. Characteristic features of the inter-war Old English style include the domestic scale, asymmetry of the building form and vertical proportions of the projecting gables, the prominent battened gables, textured render walls, casement and multi-paned windows, internal beamed ceilings, fine internal timber joinery and high-waisted panelled doors. External walls of Headfort House are generally masonry with painted stucco finish. The main roofs are pitched with red glazed terracotta tiles and painted metal eaves gutters.

The north elevation of the main part of the building faces Stanhope Road. It has a double roof gable and features an entry porch which provides access to the building's original front door. The framed walls feature expressed vertical timber battens, which are also used on the building's gables. Although the timber battens are currently painted to match the walls, early photographs show that the expressed timber elements and window frames were originally painted or stained to be dark coloured, to contrast with the light-coloured broad walls. The recessed entry porch (north elevation) has two half-height stuccoed masonry piers with smooth rendered pediments and twin timber columns above. The eastern wing, now used as a chapel, has masonry external walls with painted stucco finish, built on sandstone footings (visible on the north elevation). The pitched roof is tiled, and eaves are timber boarded with expressed timber rafters. A comparison of the building's current condition with external photographs indicate that the overall size and form of the wing remains unchanged, although there have been changes to the fenestration.

General views of the site are provided below for reference.

¹ KuRing-gai Council "Headfort House" building, interiors and grounds: State Heritage Inventory (for proposed listing)



Figure 2 The principal northern façade

Source: [Urbis 2022]



Figure 3 The northern façade of the chapel wing and grounds.

Source: [Urbis 2022]



Figure 4 The principal entry /recessed northern verandah

Source: [Urbis 2022]



Figure 5 Eastern elevation of the chapel wing and single storey brick addition (1980s)

Source: [Urbis 2022]



Figure 6 The principal façade and Moreton Bay Fig in front of the building

Source: [Urbis 2022]



Figure 7 Western façade and early garage

Source: [Urbis 2022]

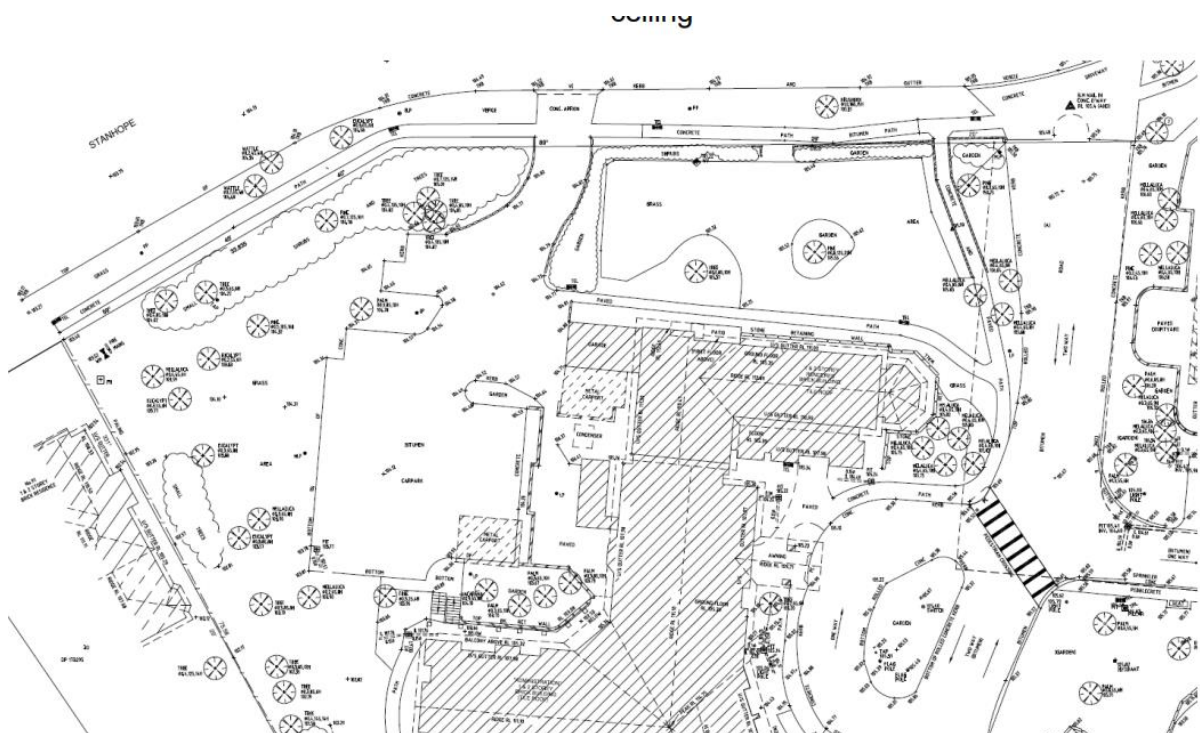


Figure 8 Site survey.

Source: [Existing site survey extract (source: Norton Survey Partners, 2022) as referenced in Ku-ring-gai Council 2022]

The ground floor consists of an entry lobby with stairs to the upper floor, a library, a storeroom for the café, an office and a bathroom. The upper floor is a residential flat, with bedroom, bathroom, large living/kitchen, and hall. The former verandah, now enclosed, is used as a storeroom. There are some original features internally, including the timber stair and decorative joinery in the main entry and ground floor office area, although these reflect typical and unremarkable interiors.



Figure 9 The ground floor entry

Source: [Urbis 2022]



Figure 10 Joinery in the ground floor office adjacent to the main entry.

Source: [Urbis 2022]



Figure 11 Detail of the original stair

Source: [Urbis 2022]



Figure 12 Interior of the chapel wing (1980s)

Source: [Urbis 2022]

STATUTORY LISTINGS

Neither Headfort House nor any part of the LRV site are identified as local heritage items on Schedule 5 of the Ku-ring-gai Local Environmental Plan 2015 (LEP 2015). The northwest corner of the LRV site is located within the Crown Blocks Heritage Conservation Area (C22). The subject site is also in the vicinity of heritage items, being the Seven Little Australians Park (the western part of the former Lindfield Park), which adjoins the subject site to the south and east (see the Heritage Map at Figure 13 below). The site also adjoins the Crown Blocks Heritage Conservation Area (C22).

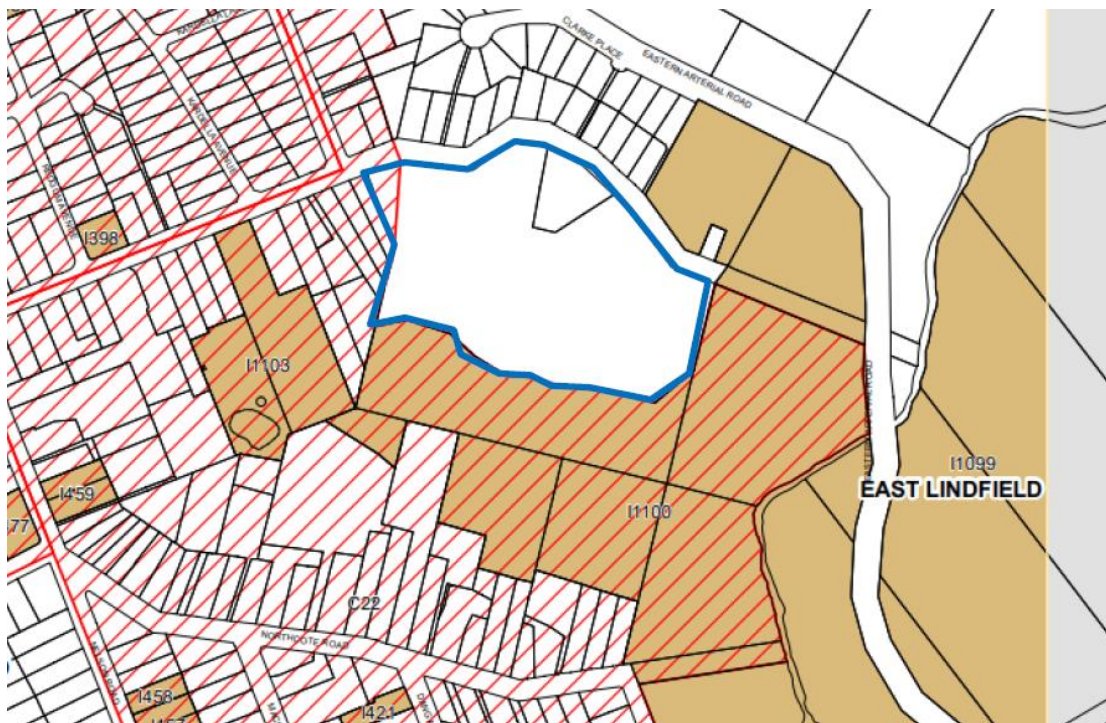


Figure 13 Extract of heritage map with the approximate boundary of the subject site outlined in blue.

Source: [Ku-ring-gai LEP 2015, Heritage Map 14]

HERITAGE SIGNIFICANCE

Statements of heritage significance summarise the heritage values of a place – why it is important and why a statutory listing was made to protect these values. The Heritage Council of NSW recognises four levels of heritage significance in NSW: Local, State, National and World. The level indicates the context in which a heritage place/item is important (e.g. local heritage means it is important to the local area or region). Heritage places that are rare, exceptional or outstanding beyond the local area or region may be of State significance. The NSW heritage assessment criteria encompass the four values in the Australia ICOMOS Burra Charter, which are commonly accepted as generic values by Australian heritage agencies and professional consultants, being historical, aesthetic, scientific and social significance. These values are expressed as seven criteria in a more detailed form.

The NSW Heritage Council establishes seven criteria of local or state significance. These include seven values of local heritage significance: (a) Historic significance (b) Historic associations

significance (c) Aesthetic or technical significance (d) Social or community significance (e) Research significance (f) Rarity (g) Representative significance.

Headfort House has been subject to two Heritage Assessments. *Headfort House, 95 Stanhope Road, Killara, Heritage Significance Assessment* was prepared by GML for Stockland, May 2017. Council then prepared a further Heritage Assessment and/or inventory, taking into account the existing GML heritage report and further investigation, to confirm or determine the significance assessment and listing curtilage for the building and its setting in line with NSW Heritage Council guidelines. *Headfort House Heritage Assessment Review, 95 Stanhope Road, Killara* was completed by Ku-ring-gai Council in 2022.

The following assesses the subject Headfort House against the significance criteria and also considers the assessments undertaken by GML (2017) and Council's further review by Claudine Loffi (2022).

A – Historical Significance

An item is important in the course or pattern of the local area's cultural or natural history.

GML Heritage Assessment (2017):

Headfort House was purpose built as the establishment building of a private school for boys with boarding facilities (Headfort School), c.1918. It is evidence of development in the Killara area at the time, as the suburb expanded and its population grew, and the need for new schools arose.

Later, Headfort House, together with other buildings on the site (now demolished) and adjacent open areas, was used by the Australia Army as a base for housing and training women for the eastern command of the Australian Women's Army Service (AWAS) during World War II.

Following World War II, the building was used as part of Lourdes Hospital and later became part of Lourdes Retirement Village.

The property has local significance under this criterion. Its construction as a school is evidence of the growth and development of Killara. It has further significance for its use by AWAS during World War II. Its later use as a tuberculosis hospital is evidence of the specialised facilities that were required at the time for the treatment of tuberculosis.

KRG Heritage Assessment Review (2022):

In addition to the GML assessment:

The house and grounds are significant as evidence of the state's first training base for the Australian Army for the Australian Women's Army Service (AWAS) during World War II. The AWAS occupied, repaired and trained in the former school buildings and grounds, as documented in available photos from the 1940s. It also demonstrates the post-war adaption of former educational sites into hospitals, to manage the epidemic of tuberculosis, for the Missionary Sisters of the Society of Mary (SMSM) Lourdes Hospital through to 1967. It demonstrates the specialised facilities that were required at the time for the treatment of tuberculosis. The

continuity of the historical process of health care at this site has been demonstrated for more than 75 years, as Mater Misericordia Hospital from 1967 and Lourdes Retirement Village from the 1980s to present.

Urbis Assessment:

Headfort House was established as a school in 1918 but its use in this capacity was relatively short-lived, with numbers diminishing it closed in 1935. Attempts to lease the building failed and it was vacant before being requisitioned by the Australian Army as a base for housing and training women recruited into the Australian Women's Army Service (AWAS). Research indicates it may have been the first such AWAS facility but closed and was converted in 1942 to an AWAS NCO school when the recruit training camp was established at Ingleburn. The facility closed in 1944 and was repurposed for use as a hospital staffed by the Missionary Sisters of the Society of Mary, largely for the treatment of Tuberculosis, and opening in 1946. Finally, it was redeveloped in the 1980s for the Lourdes Retirement Village.

The site has had a variety of institutional uses and may be of interest in particular for its use as the first AWAS training facility, however the historical associations are considered to be diminished by substantial alterations and redevelopment of the site, such that only Headfort House survives (in an altered condition), with the remaining school buildings removed and the grounds and setting compromised. While the AWAS certainly occupied the main part of the building, there is no evidence of specific alterations for the function and there is no surviving evidence of the specific army function on the site. The AWAS only occupied the site as a training ground for 2 years before establishing the main training ground at Ingleburn. The GML report also notes that the facilities on the subject site were sub-standard and not fit for purpose.

The main part of the building does not differ in any substantial way from a residential building and the original floor plan of the chapel wing is no longer intact. As such, it is not considered demonstrative of the various institutional uses.

The property does not have heritage significance under this criterion.

Guidelines for Inclusion

- shows evidence of a significant human activity ☐
- is associated with a significant activity or historical phase ☐
- maintains or shows the continuity of a historical process or activity ☐

Guidelines for Exclusion

- has incidental or unsubstantiated connections with historically important activities or processes ☒
- provides evidence of activities or processes that are of dubious historical importance ☐
- has been so altered that it can no longer provide evidence of a particular association ☒

B – Associative Significance

An item has strong or special associations with the life or works of a person, or group of persons, of importance in the local area's cultural or natural history.

GML Heritage Assessment (2017):

The property has an association with the Reverend Robert Thompson Wade, who founded the Headfort School on the site in 1918, and who commissioned the construction of Headfort House as the establishment building of the school. Wade was the headmaster of Headfort School until 1928. Wade is best known for his work as an ichthyologist and palaeontologist, although he worked extensively in education throughout his career. Wade is considered to be a person of significance with whom Headfort House is associated.

John Gorton, Prime Minister of Australia 1967-1971, was a student at Headfort School for two years, while living in Killara. Although Gorton is a person of importance to NSW, his attendance at the school was short-lived, and he also attended other schools. The site's association with Gorton is therefore considered to be a minor one.

The property has local significance under this criterion, for its association with the Reverend Robert Thomas Wade.

KRG Heritage Assessment Review (2022):

Main points of significance as assessed by GML are accepted with some edits to remove a comment and adding point on the former Prime Minister's association. While the two-year period of the former Prime Minister's attendance is noted as emphasised in the GML assessment, as this was part of the formative schooling years of an Australian Prime Minister, this is not considered an incidental connection to meet the exclusion guidelines. His aptitude and excelling in some fields was recognised by awards at this school.

Urbis Assessment:

Urbis concurs with the GML assessment with regard to the former John Gorton, Prime Minister of Australia 1967-1971. This is considered to demonstrate an incidental connection. Gorton spent only a two-year period at the school. The association is not evident in the physical fabric and the historical record does not demonstrate any specific evidence of achievement (despite awards) that is specifically relevant to Gorton's importance as a former Prime Minister.

Urbis does not concur with the attribution of associative significance with regard to Reverend Robert Thompson Wade. Although Wade established the school in 1918, this association is relatively short-lived, selling the school just 10 years later. Thereafter, Wade returned to teaching at various high-profile institutions including the Kings School. The GML assessment notes that Wade is best known for his work as an ichthyologist and palaeontologist, although he worked extensively in education throughout his career. If Wade is considered a significant person for his contribution to scientific research, which in itself has not been

established, the historical record does not demonstrate any specific evidence of achievement associated with the school, that is specifically relevant to Wade's research and scientific contribution.

The property does not have heritage significance under this criterion.

Guidelines for Inclusion

- shows evidence of a significant human occupation ☐
- is associated with a significant event, person, or group of persons ☐

Guidelines for Exclusion

- has incidental or unsubstantiated connections with historically important people or events ☒
- provides evidence of people or events that are of dubious historical importance ☒
- has been so altered that it can no longer provide evidence of a particular association ☒

C – Aesthetic Significance

An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the local area.

GML Heritage Assessment (2017):

Historical documents suggest that Headfort House was architect designed, but the identity of the designer is unknown.

The materials and building technology used – sandstone, brickwork, stucco and timber – are typical of the period, and were not used in any innovative way. Although it is documented that the building was designed as a school, the floorplan of Headfort House is unremarkable. The main part of the building does not differ in any substantial way from a residential building and the original floor plan of the chapel wing is no longer intact. As such, it is not considered that the building displays any technical or creative innovation or achievement.

Headfort House faces Stanhope Road, setback from the road behind a wide front yard. Although the building has a streetscape presence, it does not have landmark qualities beyond the bounds of the LRV; within the LRV the building is architecturally distinctive as the only early twentieth century building on the site. However, when considered as part of the wider Killara area, the domestic scale of the house, its simple Arts and Crafts style and its typical garden setting mean that the building is unremarkable within its largely residential surroundings.

The north elevation of the building, its main elevation – is the most detailed of the building's elevations. The north elevation of the main part of the building is intact and demonstrates a considered composition and uses timber battens as an architectural feature. The use of expressed timber battens is a common feature of the Arts and Crafts style and has been used here in a simple but effective manner. The use of rough stucco on the walls is most likely original and has been used in contrast with the smooth sheet cladding of the framed wall sections. However, the north elevation of the chapel wing is largely featureless. The original fenestration on

the chapel wing has been removed on all elevations. Overall, beyond the use of the stucco and timber battens, there is little applied decoration, and the building design is perfunctory. Internally, rooms are of a domestic scale, and proportion. There is some interesting detailing – mainly timber- extant in the ground floor entry lobby and office, which are the most intact rooms of the building. However, the interior of the building is generally unremarkable. As such it is not considered that the building exemplifies the Arts and Crafts style.

The original form of the front garden is legible and partly intact: the original garden was simple in design, with lawns surrounded by gardens and hedges, and this concept has been maintained. The original gates have been demolished.

The property does not have heritage significance under this criterion.

KRG Heritage Assessment Review (2022):

Dating from 1917-21, it is agreed that Headfort House does not represent a good example of the Federation Arts and Craft style (c1890-c1915) because it was built in the inter-war period and most represents the Old English style of this period (c1915- c1940).

The building in its setting is considered to meet the inclusion guidelines for its aesthetic distinctiveness as a former school building in a predominantly residential setting on Stanhope Road. It is also distinctive locally as an adaptation of the interwar Old English style to an institutional building instead of the more common residential examples of this style in the area. Headfort House demonstrates a good example of the inter-war Old English style with characteristic features of the style. Its more restrained ornamentation reflects its school use and the period of construction during wartime of World War I and the few years following. Characteristic features demonstrated of the inter-war Old English style include the domestic scale, asymmetry of the building form, vertical proportions of the projecting gables, the prominent battened gables, textured render walls, casement and multi-paned windows, internal beamed ceilings, fine internal timber joinery and high-waisted panelled doors. The garden setting and layout complements the period of architecture with mature trees and contemporary materials.

The building and its landscaped grounds contribute to the streetscape of Stanhope Road. Its sensory appeal as a building in a landscaped setting within large institutional complex has been maintained with no new building forward of the front building line, a maintained relationship to Stanhope Road, eastern entrance drive and turning circle, and its land that has remained unsubdivided since the early twentieth century. Alterations have only temporarily degraded this appeal through the neglected and uniform painting of external timberwork including the gable battens and placement or growth of the vegetation. This can be readily rectified with routine maintenance through re-painting the timberwork, pruning or moving the fig tree.

The 1980s alterations to the eastern wing for conversion to a chapel have made minimal change to the original building form, which can still be recognised. The 1980s alterations are easily discernible as such through the materials, evidence of the infilled first floor windows and retained original ceiling above the chapel ceiling. While representing a different architectural period than the inter-war building, these alterations also have some historic and social significance in their own right due to the chapel use.

Early records indicate that the extant building represents the work of an architect experienced in school design, however the name of the architect has yet to be identified.

Urbis Assessment:

The GML and KRG assessments disagree on the style of the building. The GML report attributes the style as Federation Arts and Crafts, while the KRG report identifies the building to be an adaptation of the interwar Old English style, as applied to an institutional building. Urbis concurs with the KRG report in terms of the stylistic analysis but does not agree with the attribution of local heritage significance under this criterion.

The materials and building technology used – sandstone, brickwork, stucco and timber – are typical of the period, and were not used in any innovative way. The building incorporates typical details and features, notably the use of stucco and timber battens as applied decoration however it does not demonstrate the full range of characteristics or complexity typical of the style. Rather, the building reflects a restrained and pedestrian example of the period and typology and as such, does not demonstrate creative innovation or achievement. The building has been considerably altered, including changes to fenestration on the chapel wing which are regarded as intrusive and detracting from the streetscape. Internally, rooms are of a domestic scale, and proportion. There is some interesting detailing – mainly timber- extant in the ground floor entry lobby and office, which are the most intact rooms of the building. However, the interior of the building is generally unremarkable.

The Old English style was more commonly applied to residential than institutional buildings, however the main part of the building does not differ in any substantial way from a residential building, and thus is not considered to reflect a significant departure in the application of the style.

Aspects of the garden setting complement the building, specifically the setback from the street and mature tree plantings, including the two Norfolk Island pines and Moreton Bay fig however these are later additions (c.1940s) and the garden, setbacks and layout largely reflects the later 20th century redevelopment for the LRV.

Research has not determined the designer of the building, although the GML report has indicated that it was architect designed.

The KRG Assessment has suggested that the chapel wing demonstrates social significance due to its use. Specific uses, such as religious functions, do not automatically infer social significance and this claim is unsubstantiated. Any proposed listing should acknowledge that the building has the potential to be improved by restoration, based on documentation and the historical record. This may include via the restoration of façade fenestration, which may alter the use of the chapel.

The property does not have heritage significance under this criterion.

Guidelines for Inclusion

- shows or is associated with, creative or technical innovation or achievement ☐
- is the inspiration for a creative or technical innovation or achievement ☐
- is aesthetically distinctive ☐
- has landmark qualities ☐
- exemplifies a particular taste, style or technology ☐

Guidelines for Exclusion

- is not a major work by an important designer or artist ☐
- has lost its design or technical integrity ☒
- its positive visual or sensory appeal or landmark and scenic qualities have been more than temporarily degraded ☒
- has only a loose association with a creative or technical achievement ☒

D – Social Significance

An item has strong or special association with a particular community or cultural group in the local area for social, cultural or spiritual reasons.

GML Heritage Assessment (2017):

Headfort House is the last building remaining on site from the time prior to the retirement village. As such, it has an association with groups that had prior use of the site. Headfort House has a special association with the Eastern Command of the Australian Women's Army Service (AWAS), who occupied the site between 1942 and 1944. Headfort House also has a special association with the Missionary Sisters of the Society of Mary, who established the Lourdes Hospital on the site in 1944. It also has a special association with former patients and staff of Lourdes Hospital.

Headfort House, through its various historical uses and current use as a retirement village, is important to the Ku-ring-gai community's sense of place.

The property has local significance under this criterion.

KRG Heritage Assessment Review (2022):

Updated without substantive changes. Some further indicators of social significance may be gathered during the public consultation for the listing.

Urbis Assessment:

Urbis does not concur with the attribution of social significance. The assessment identifies previous groups that have been associated with the site historically, notably the Missionary Sisters of the Society of Mary (SMSM) and the Eastern Command of the Australian Women's Army Service (AWAS), but simple identification of

relevant historical groups does not automatically infer that those associations are significant. Neither the GML nor KRG Council assessment has demonstrated specific importance of the place to the identified groups, over and above the value provided by the amenity. It is not clear what methodology has been used to determine this social significance, and community consultation is ideally required to establish such significance.

Associations may be less relevant as time progresses or with a change of use. For instance, any potential social significance attached to the use of the site for a hospital and for its association with the Missionary Sisters of the Society of Mary is likely to be diminished by the discontinuation of the use and occupation of the site, noting that the site has been occupied for the retirement village for almost 40 years. This does not demonstrate a contemporary association for SMSM and importance to the group is not demonstrated. Similarly, the assertion of special association to past patients or staff of the Lourdes Hospital, and further that its current use as a retirement village, is important to the Ku-ring-gai community's sense of place, are vague and unsubstantiated. It is certainly an important amenity to provide a retirement village where the community is able to age in place, but there is no evidence of importance attached specifically to the LRV – especially where an improved facility may be of equal or greater value to the community.

Potential social values are also diminished by the integrity of the place, noting that Headfort House is the only remnant of the pre-LRV landscape, the broader site being substantially redeveloped in the latter 20th century.

The property does not have heritage significance under this criterion.

<ul style="list-style-type: none"> ▪ <u>Guidelines for Inclusion</u> 	<ul style="list-style-type: none"> ▪ <u>Guidelines for Exclusion</u>
<ul style="list-style-type: none"> ▪ is important for its associations with an identifiable group <input type="checkbox"/> 	<ul style="list-style-type: none"> ▪ is only important to the community for amenity reasons <input checked="" type="checkbox"/>
<ul style="list-style-type: none"> ▪ is important to a community's sense of place <input type="checkbox"/> 	<ul style="list-style-type: none"> ▪ is retained only in preference to a proposed alternative <input checked="" type="checkbox"/>

E – Research Potential

An item has potential to yield information that will contribute to an understanding of the local area's cultural or natural history.

GML Heritage Assessment (2017):

Historic photographs show that a single storey building was located to the west of Headfort House, now partly occupied by the carpark. The building was demolished after 1943. There is some archaeological potential in the part of this site where the building was located. Elsewhere extensive building works associated with the development of the LRV means that there is little archaeological potential elsewhere in the vicinity of Headfort House.

The property does not have heritage significance under this criterion.

KRG Heritage Assessment Review (2022):

While it is agreed that this research significance is not yet confirmed, the building and site has potential to represent an important benchmark or reference site of an early Australian Women's Army Service (AWAS) training site from World War II.

Urbis Assessment:

Urbis concurs with the findings of the GML report that the site does not meet criteria for heritage significance under this criterion, however it should be noted that we have not undertaken a detailed archaeological assessment.

Headfort House may be of some limited interest as the site of the first Australian Women's Army Service (AWAS) training site from World War II. The AWAS only occupied the site as a training ground for 2 years before establishing the main training ground at Ingleburn. While the AWAS certainly occupied the main part of Headfort House, there is no evidence of specific alterations for the function and due to the redevelopment (and the transitory nature of the use) there is no specific evidence of the army function on the site, which limits the research potential and contribution.

The property does not have heritage significance under this criterion.

Guidelines for Inclusion

- has the potential to yield new or further substantial scientific and/or archaeological information ☐
- is an important benchmark or reference site or type ☐
- provides evidence of past human cultures that is unavailable elsewhere ☐

Guidelines for Exclusion

- the knowledge gained would be irrelevant to research on science, human history or culture ☐
- has little archaeological or research potential ☒
- only contains information that is readily available from other resources or archaeological sites ☐

F – Rarity

An item possesses uncommon, rare or endangered aspects of the local area's cultural or natural history.

GML Heritage Assessment (2017):

Stylistically, Headfort House at 95 Stanhope Road exhibits Arts and Crafts style features that are common to many houses in Ku-ring-gai, both large and small. It is considered that the Arts and Crafts style of architecture is better represented by other properties in the Ku-ring-gai local government area.

As an early 20th century building adapted for use as a hospital, Headfort House is not rare. The original house at Neringah Hospital, Wahroonga (1912) was converted for use as part of a convalescent hospital in 1939, and now exists as part of a larger health-care facility.

The property does not have heritage significance under this criterion.

KRG Heritage Assessment Review (2022):

The comparative analysis included in the GML Heritage report does not compare this site with directly comparable or relevant examples to support the given conclusions on rarity. The only comparative examples given are for a different architectural style and period (Federation Arts and Crafts), rather than the inter-war period and style of this building, and hospital conversions of buildings also of earlier periods than this building. It does not include comparisons with other more relevant types and groups that this place represents of: inter-war private school buildings, the work of the undetermined architect (noted as experienced in designing schools in early records), other buildings constructed during wartime or shortly following World War I, buildings converted for World War II training, other buildings adapted for and associated with the WWII Australian Women's Army Service, or hospital conversions of inter-war buildings.

The property is considered rare as surviving evidence of the first Australian Women's Army Service training site in NSW for the World War II war effort. As such, this site represents significant changes for the role of women in Australian society and military during the mid-twentieth century, of importance to the community. The extant building and grounds, that were adapted in 1940s for this use, survive from this period. While the grounds have been substantially altered since this use, this significance is enhanced by the collection of historic photographs that document the World War II women's army training at this site, held by the Australian War Memorial and State Library.

It is agreed that the building is unlikely to be rare in the upper north shore as a school pr architecture of its period and style or a hospital conversion generally.

Urbis Assessment:

Urbis concurs with the findings of the GML report that the site does not meet criteria for heritage significance under this criterion.

The KRG report has questioned the relevance of the comparative analysis prepared in the GML report (2017), noting that the style was incorrectly attributed to Federation Arts and Crafts typology, while Headfort House demonstrates typical characteristics of the inter-war period and Old English typology. Although built as a school, the main building is stylistically consistent with residential buildings in the LGA, and there are listed dwellings in the LGA of this period and typology. The KRG report agrees that the building is unlikely to be rare in the upper north shore as an example of school architecture or a hospital conversion generally.

The KRG assessment considers the site to be rare as the first Australian Women's Army Service training site in NSW for World War II, however there is limited evidence of the function on the site, with only the main building remaining extant, and this building pre-dates the army function. While the AWAS certainly occupied

the main part of the building, there is no evidence of specific alterations and there is no surviving evidence of the army use on the broader site.

The property does not have heritage significance under this criterion.

Guidelines for Inclusion

- provides evidence of a defunct custom, way of life or process ☐
- demonstrates a process, custom or other human activity that is in danger of being lost ☐
- shows unusually accurate evidence of a significant human activity ☐
- is the only example of its type ☐
- demonstrates designs or techniques of exceptional interest ☐
- shows rare evidence of a significant human activity important to a community ☐

Guidelines for Exclusion

- is not rare ☒
- is numerous but under threat ☐

G – Representative

An item is important in demonstrating the principal characteristics of a class of NSWs (or the local area's):

- *cultural or natural places; or*
- *cultural or natural environments.*

GML Heritage Assessment (2017):

The building has some interest as being purpose-built as the Headfort School. However, the chapel wing has lost much of its integrity with little of the original design intact beyond its external form. In addition, the second large building which was a part of the school – built soon after Headfort House - has been demolished, as have other smaller buildings and facilities that were part of the school. In this sense, little integrity remains of the site as a school.

The property does not have heritage significance under this criterion.

KRG Heritage Assessment Review (2022):

The comparative analysis included in the GML Heritage report does not compare this site with directly comparable or relevant examples to support the given conclusions on representative significance. The only comparative examples given are for a different architectural style and period (Federation Arts and Crafts), rather than the inter-war period and style of this building, and hospital conversions of buildings also of earlier periods than this building. It does not identify or compare this with relevant other examples of the work of the undetermined architect (noted as experienced in designing schools in early records) or other inter-war school buildings, amongst further relevant types and groups that this place represents.

The building and its site is considered representative of the following types and groups within the local context of the upper north shore: purpose-built inter-war school buildings, buildings constructed during wartime or shortly following World War I, buildings converted for World War II training, other buildings adapted for and associated with the WWII Australian Women's Army Service and hospital conversions of inter-war buildings. The WWII types are supported by documentary evidence of photos of the women's army training on this site.

It is agreed the architecture does not represent a good example of the Federation Arts and Crafts style because it represents inter-war architecture. The building demonstrates the more robust features of the inter-war period, more so than Federation ornamentation. Its relatively restrained ornamentation, compared to other examples of the Federation or inter-war periods, also reflects its school use and period of construction during wartime and the few years following.

Urbis Assessment:

Urbis concurs with the findings of the GML report that the site does not meet criteria for heritage significance under this criterion.

Headfort House presents an unremarkable and restrained example of the inter-war Old English typology and does not demonstrate the full range of characteristics of the style. The building and the site have been substantially altered, the second large building which was a part of the school – built soon after Headfort House - has been demolished, as have other smaller buildings, associated structures and facilities that were part of the school or subsequent army occupation. The main building has been variously altered including works to convert the former dormitory to a chapel, which has resulted in unsympathetic changes to the façade including the removal of fenestration and detailing. In this context, little integrity remains of the site, and the building is not considered to be representative of any of its various institutional functions, either as a school, or converted for military and hospital uses. The building likely fulfilled administrative and/ or residential functions for each of the respective uses and is not distinctive.

The property does not have heritage significance under this criterion.

Guidelines for Inclusion

- is a fine example of its type ☐

Guidelines for Exclusion

- is a poor example of its type ☒

<ul style="list-style-type: none"> ▪ has the principal characteristics of an important class or group of items <input type="checkbox"/> ▪ has attributes typical of a particular way of life, philosophy, custom, significant process, design, technique, or activity <input type="checkbox"/> ▪ is a significant variation to a class of items <input type="checkbox"/> ▪ is part of a group which collectively illustrates a representative type <input type="checkbox"/> ▪ is outstanding because of its setting, condition or size <input type="checkbox"/> ▪ is outstanding because of its integrity or the esteem in which it is held <input type="checkbox"/> 	<ul style="list-style-type: none"> ▪ does not include or has lost the range of characteristics of a type <input checked="" type="checkbox"/> ▪ does not represent well the characteristics that make up a significant variation of a type <input checked="" type="checkbox"/>
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CONCLUSION/ REVISED STATEMENT OF SIGNIFICANCE

The building has been assessed and doesn't meet the criteria for heritage listing as an item of local heritage significance under any of the seven (7) criteria.

Headfort House is a remnant of the Inter-war development of the site for a school and is of some historical interest as the first training facility in the state for the Australian Women's Army Service (AWAS). However, the building and the site have been substantially altered as part of the redevelopment for the LRV, such that it is considered compromised. The second large building which was a part of the school – built soon after Headfort House - has been demolished, as have other smaller buildings, associated structures, and facilities that were part of the school or subsequent army occupation. Headfort House was at best a pedestrian example of the period and has been variously altered including works to convert the former dormitory to a chapel, which has resulted in unsympathetic changes to the façade including the removal of fenestration and detailing.

While there are some elements of the setting that complement Headfort House, specifically the retained street front setback and mature tree plantings (Norfolk Island Pine x 2 and the Moreton Bay Fig) the current setting is the result of the redevelopment of the Lourdes Retirement Village and does not reflect its historical subdivision or setting. The former school building sits within a pleasant but contemporary landscape.

In this context, little integrity remains of the site.

HERITAGE CURTILAGE

KRG Heritage Assessment Review (2022) has recommended a reduced lot curtilage for the proposed heritage item. This is considered appropriate in the absence of relevant historical lot boundaries. The curtilage provided for the proposed heritage item in the Council report was intended to capture:

- an appropriate curtilage for the setting of Headfort House, historically and currently, viewed in the round from the larger non-residential complex
- Headfort House in full including interiors, garage and chapel additions
- Visual and physical connection of Headfort House to Stanhope Road, the main entrance drive and turning circle,
- Garden setting and former tennis court near Headfort House and mature early trees within the vicinity of Headfort House

A setback of 12m is proposed to the east, south and west, aligning with Council's established policy for 12m setbacks for new development of heritage items in the Development Control Plan



Figure 14 Heritage curtilage as identified in the KRG Heritage Assessment Review (2022)

Source: [KRG Heritage Assessment Review (2022)]

An alternative curtilage was also provided that captured a broader landscape setting and included the full width of the entrance road, the full turning circle, and the avenue of palm trees to the east of this road, and grotto to the south-east of Headfort House.



Figure 15 Alternate heritage curtilage as identified in the KRG Heritage Assessment Review (2022)

Source: [KRG Heritage Assessment Review (2022)]

RECOMMENDATIONS

Having regard for the above assessment, the following recommendations are provided in response to the PP (reference no. S13801-1).

1) Heritage Listing

It is assessed that Headfort House does not meet the criteria for heritage listing as an item of local heritage significance under any of the criteria. Headfort House is a remnant of the Inter-war development of the site for a school and is of some historical interest as the first training facility in the state for the Australian Women's Army Service (AWAS). However, the building and the site have been substantially altered as part of the redevelopment for the LRV, such that it is considered compromised. **In this context, little integrity remains of the site and therefore it is recommended that the proposed heritage listing does not proceed.**

In the event that Council proceeds with the listing, it is requested that the inventory sheet, in particular the significance assessment and recommended management be reviewed in conjunction with the proponent and their Heritage Consultant. The significance assessment is the basis for understanding the heritage values of the place and its future management and it is imperative that it is an accurate reflection of the site's values. For instance, the aesthetic values (criterion c) in the KRG assessment are considered inflated. Having regard for the extensive changes to Headfort House and its setting, and the fact that it is an unremarkable example of the period, it should be recognised that the building has further tolerance for change to facilitate its ongoing use and further that there are opportunities for the presentation of the building to be improved based on restoration in line with historical documentation. This would include the reinstatement of fenestration to the chapel wing which the KRG assessment has suggested has social significance. Any assertion of social significance or archaeological potential requires further investigation and justification.

2) Curtilage

The proposed curtilage and certainly the alternate curtilage nominated by Council are considered excessive and should be reduced. Whilst a physical and visual curtilage is important for heritage items, it must be recognised that the building sits within an almost entirely contemporary landscape, (albeit a sympathetic one) that is the product of the redevelopment for the Lourdes Retirement Village and does not reflect its historical subdivision or setting. The curtilage as nominated captures fabric and features that are not of heritage significance such as driveways and hardstand parking areas as well as part of the 1980s additions to the rear. This may unreasonably limit works and otherwise sympathetic change within these areas. In a practical capacity it may also necessitate consent for otherwise minor works, such as roadworks or interior fitout of the 1980s additions.

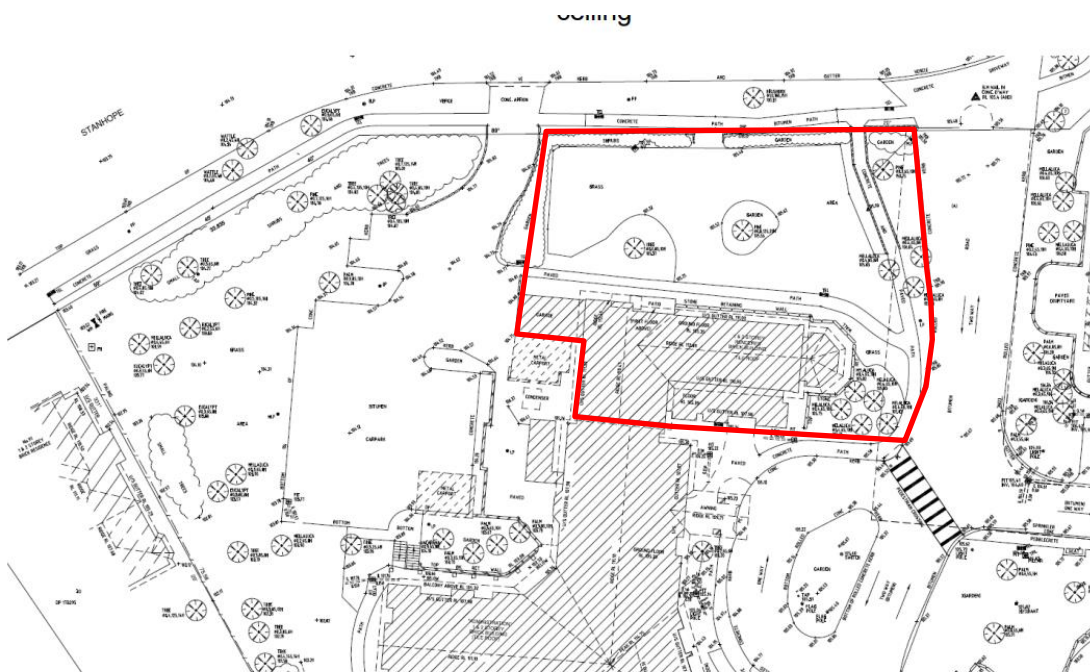
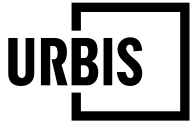


Figure 16 Site survey with Urbis recommended reduced curtilage.

Source: [Existing site survey extract (source: Norton Survey Partners, 2022) as referenced in Ku-ring-gai Council 2022]



While the heritage listing is not recommended to proceed (see point 1 above), a reduced curtilage is provided above and captures those physical and historical aspects of the site which are considered to complement Headfort House and its setting, being the building itself, the retained street front setback and inter-war tree plantings, (the Moreton Bay Fig and two Norfolk Island Pine trees), while also recognising the broader contemporary landscape setting. It is noted that consent is required for works in the vicinity of a heritage item and therefore it is considered that the increased curtilage recommended by the KRG assessment offers no additional protection to the building, while also limiting practical works in these areas.

We trust the above will assist with the consideration of the Planning Proposal, however, should you have any queries regarding the submission, please feel free to contact the undersigned as detailed below.

Kind regards,

A handwritten signature in black ink, consisting of a stylized, cursive 'F' followed by a horizontal line extending to the right.

Fiona Binns
Associate Director
+61 2 8233 7610
fbinns@urbis.com.au