



# **Hotham House**

Heritage Documentation Review

August 2022



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# Contents

<b>1</b>	<b>Background</b>	<b>1</b>
1.1	Introduction	1
1.2	The Site and Building	2
1.3	Methodology	2
1.4	Limitations	3
1.5	Authors	3
<b>2</b>	<b>Statutory Heritage Context</b>	<b>5</b>
2.1	Heritage Act 1977	5
2.1.1	Registered Heritage Places	5
2.1.2	Archaeology	5
2.1.3	State Agency Registers	5
2.1.4	Interim Heritage Orders	6
2.2	Environmental Planning and Assessment Act 1979 (NSW)	6
2.2.1	Local Environment Plans	6
2.2.2	State Environmental Planning Policy (Planning Systems) 2021	7
2.2.3	Greater Sydney Commission – South District Plan	7
2.2.4	State Significant Development	8
2.3	Timeline of development applications and heritage listing	8
<b>3</b>	<b>Review of Significance of Hotham House</b>	<b>10</b>
3.1	Background to Assessment	10
3.2	Basis of Review	10
3.3	Background to Listing	11
3.4	Primary Statement of Significance	11
3.5	Comparison of Significance Assessments	13
3.6	Analysis of GBA Arguments	15
3.7	Summation of Analysis	22
3.8	Proposed Updated Assessment of Significance	23
<b>4</b>	<b>Review of Options and Constraints</b>	<b>25</b>
4.1	Background	25
4.2	Imagescape Design Studios Options	25
4.3	GBA Options	25
4.4	BCA Report	26
4.5	Structural Report	28
4.6	Access Report	32
4.7	Summation of Review	33
<b>5</b>	<b>Opportunities for adaptive reuse</b>	<b>34</b>
5.1	What is adaptive reuse?	34
5.2	Why retain places of local heritage significance?	34
5.3	What might successful adaptive reuse look like?	34
5.4	Precedent Images	35
<b>6</b>	<b>Conclusions</b>	<b>38</b>

6.1	Outcomes of Review	38
6.1.1	Significance	38
6.1.2	Structural Issues and BCA Compliance	38
6.1.3	Retention Options	38
6.1.4	Retention Opportunities	38
6.2	Conclusions	38
6.3	Recommendations	39

## Tables

Table 1: Comparison of Assessments against Criteria	13
Table 2: Review of BCA Report Issues	15
Table 3: Review of Structural Report Issues	15
Table 4: Review of BCA Report Issues	26
Table 5: Review of Structural Report Issues	28

## Figures

Figure 1 – Site Location – Lot 24A, DP 26995 is outlined in red. (Source: LPI Sixmaps)	3
Figure 2 – Aerial photograph of Hotham House and its context. (Source: LPI Sixmaps)	4
Figure 3 – Hotham House, viewed from Hotham Road. (Source: Google Streetview)	4
Figure 4 - 94 Acacia Road Kirrawee (Source: GoogleStreetview)	20
Figure 5 - 16 Bellingara Road, Miranda (Source: GoogleStreetview)	21
Figure 6 - 104 Toronto Parade, Sutherland (Source: GoogleStreetview)	21
Figure 7 - 88-90 Toronto Parade, Sutherland (Source: GoogleStreetview)	21
Figure 8 - 89 Woolooware Road South, Woolooware (Source: GoogleStreetview)	22
Figure 9 – Maitland Hospital: streetfront building retained and integrated within the development of the new hospital.	35
Figure 10 – Affordable housing in Parramatta: Family housing and single bed units developed on one site	35
Figure 11 – Multistorey residential development and retained heritage building in Arncliffe	36
Figure 12 – Residential development Point Fderick, NSW	36
Figure 13 – Childcare centre, Airs, NSW: former residence adapted to child care centre.	37
Figure 14 – Mount St Vincent supported housing, Burraneer: house adapted to independent living units and community meeting space.	37
Figure 15 – Porter House, Sydney: former factory and offices adapted to bars and function rooms for hotel.	37

# 1 Background

## 1.1 Introduction

Mott MacDonald have been engaged by the NSW Department of Planning, Industry and Environment (DPIE) to provide an independent review of the documentation provided for *SSD-10320 Alterations and Additions to President Private Hospital, 369-381 President Avenue, 61-65 Hotham Road and 2-4 Bidurgal Street, Kirrawee*. The proposal includes demolition of local heritage item no. I1510 "Hotham House" - house and garden, 65 Hotham Road, Gymea.

The application by Macquarie Health Corporation Limited, being SSD-10320 included in the Request for Secretary's Environmental Assessment Requirements, 24 April 2019, was noted as follows:

*The proposal consists of two precincts, known as North and the South Precincts.*

*In detail, the North Precinct will include:*

- In-patient accommodation over two floors*
- Support areas to provide In- patient programs*
- Ancillary areas as required by the Department of Health*

*In detail, the South Precinct will include:*

- Construction of new 3 storey patient accommodation and support services*
- Construction of new Stage 1 and 2 Recovery rooms*
- New Entry and Reception accessed via Hotham Road*
- New lifts one allowing for patients on stretchers the other being a standard passenger lift.*
- Demolition of existing Hotham House known as 63 - 65 Hotham Road*
- Construction of new carpark for patients, visitors and staff. Access will be from Hotham Road.*

Hotham House is currently under an Interim Heritage Order for consideration as a Heritage Item for inclusion to the Sutherland Local Environment Plan (LEP). The Interim Heritage Order was made in response to a previous development application (DA18/0788) for alterations and additions to the hospital which received 84 submissions objecting to demolition of the house.

"Hotham House" – house and garden, was entered into Schedule 5 of the *Sutherland Local Environment Plan 2011* (LEP) on 3 April 2020.

This report addresses aspects of the proposal as follows:

- Statutory Heritage Context
- Heritage Significance
- Demolition and adaptive reuse proposals

## 1.2 The Site and Building

Hotham House is located at 65 Hotham Road, Kirrawee (nb it sits on the border with the neighbouring suburb 'GyMEA' and is often so addressed). The building is situated on the west side of the street, approximately 60 metres north of the intersection with President Avenue. The land is identified as Lot 24A in DP 26995. It currently forms part of a larger property containing the President Private Hospital, located on the corner of President Avenue, in Kirrawee.

The single storey brick and iron Federation bungalow style house is well setback from the street frontage behind a generous front yard containing a mature pine tree set within a circular path and surrounded by lawn. The site slopes from the rear towards the street with a significant cross-fall to the south. The original portion of the house and early addition (1912-20) are raised above ground level on a continuous brick footing under the main walls and with brick piers to the verandah. It has later additions on the western side and north-western corner. A driveway is constructed to the northern side of the house. Additional buildings are constructed to its southern elevation. The car park constructed at the rear, and up-hill side, of the building, drains towards and under the building.

## 1.3 Methodology

The methodology used in this Report is consistent with the methodologies set out in the guideline publications for Statements of Heritage Impact and Assessing Heritage Significance published by the Office of Environment and Heritage and has been prepared in accordance with the principles of *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance*.

The review has considered the Heritage, Structural, BCA, Access and Options Analysis consultants reports provided in support of the site redevelopment and the proponent's desire to demolish the locally heritage listed building.

The following reports were specifically reviewed for this report:

- Architectural Projects Pty Ltd; *65 Hotham Road, GyMEA Heritage Assessment Review*; Report for Sutherland Shire Council; March 2019
- GBA Heritage; *65 Hotham Road, GyMEA; Statement of Heritage Impact*; Report for Macquarie Health; May 2021
- NSW Department of Planning, Infrastructure and Environment – Planning Services; *Gateway Determination Report IRF/4212; 24/06/2019*
- Imagescape Design Studios "*Design Option for Retention of Hotham House*", Report for Macquarie Health; 12/07/2021.
- MIEngineers; *Structural Inspection Report Hotham House -65 Hotham Road, Kirrawee, NSW*; Report for Macquarie Health; 25 July 2019.
- Assistive Technology Access; *Additions and Alterations to President Private Hospital Access*; Report for Imagescape Design Studios; 16th January 2019.
- Imagescape Design Studios "*Response to Submissions Report*", Report for Macquarie Health; March 2022.

## 1.4 Limitations

This report has been completed through desktop research and assessment. No site visit has been undertaken.

## 1.5 Authors

This report has been compiled by Tony Brassil, Principal Heritage Advisor, and Alice Steedman, Principal Heritage Architect, and approved by Kylie Christian, Technical Director – Heritage.

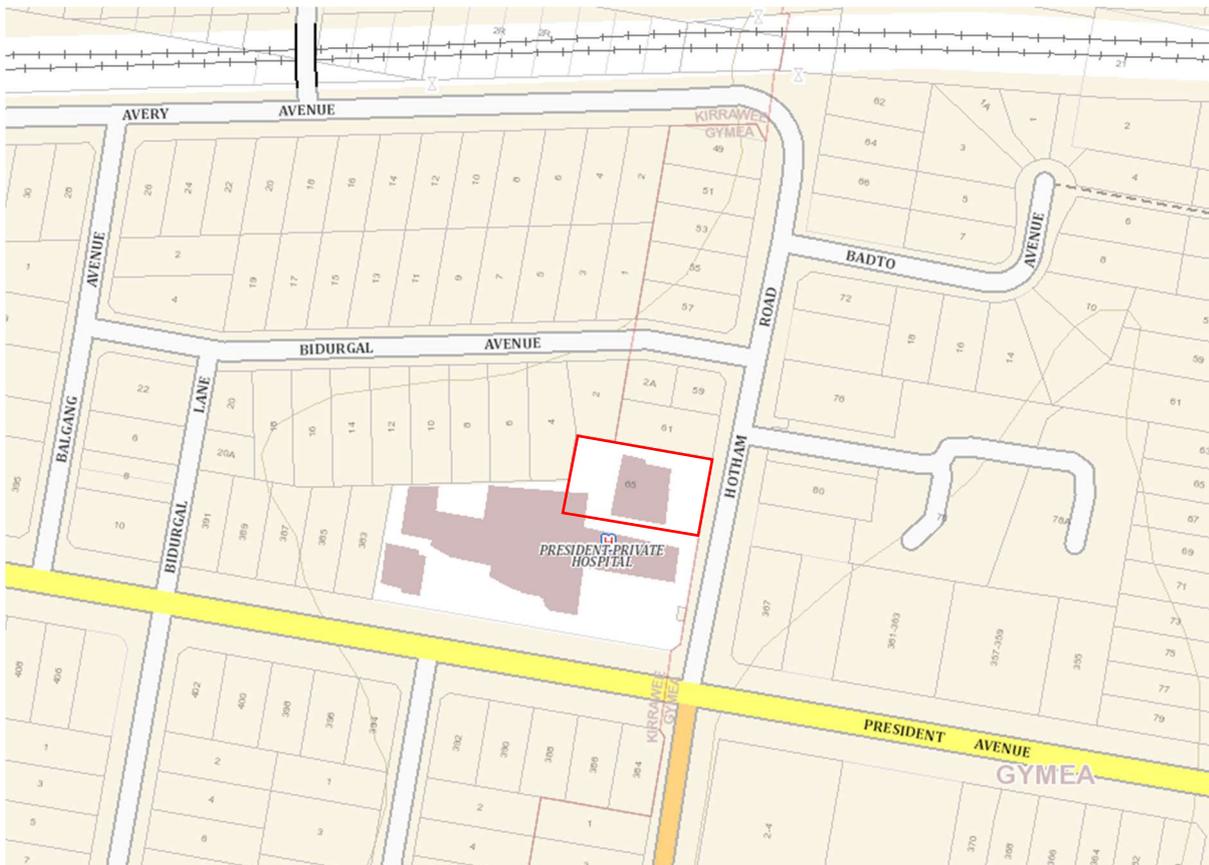
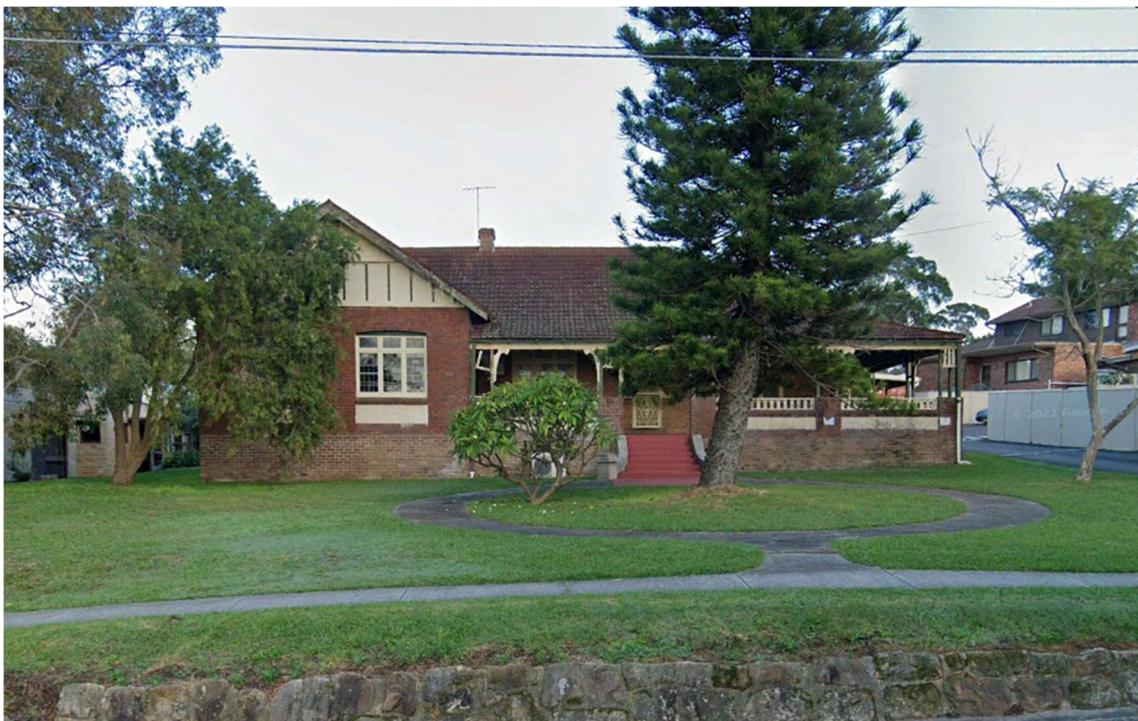


Figure 1 – Site Location – Lot 24A, DP 26995 is outlined in red. (Source: LPI Sixmaps)



**Figure 2 – Aerial photograph of Hotham House and its context. (Source: LPI Sixmaps)**



**Figure 3 – Hotham House, viewed from Hotham Road. (Source: Google Streetview)**

## 2 Statutory Heritage Context

### 2.1 Heritage Act 1977

The *Heritage Act 1977* was established to conserve the environmental heritage of NSW. Section 4 of the Act describes State heritage significance as:

*“In relation to a place, building work, relic, movable object or precinct, means significance to the State in relation to the historic, scientific, cultural, social, archaeological, natural, or aesthetic value of the item.”*

#### 2.1.1 Registered Heritage Places

The Act, inter alia, established the NSW State Heritage Register and the Heritage Council of NSW. Under Section 57(1) of the Heritage Act, approval from the Heritage Council, or its delegates, is required for any works to an item listed on the State Heritage Register. The Heritage Act specifically prohibits the full demolition of an item listed on the State Heritage Register.

The Heritage Council has published a set of Standard Exemptions from the need to seek approval for certain works. The Standard Exemptions allow the majority of routine maintenance and repair works to be undertaken without consent.

Hotham House is not included in the NSW State Heritage Register.

#### 2.1.2 Archaeology

Historical archaeological materials are protected under the ‘relics’ provisions of the *Heritage Act 1977*. A relic is defined as:

*“...any deposit, artefact, object, or material evidence that:*

*-relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement, and ...is of State or local heritage significance.”*

Section 139 of the Act states that:

*(1) A person must not disturb or excavate any land knowing or having reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed unless the disturbance or excavation is carried out in accordance with an excavation permit.*

Any historical archaeological materials found on the President Private Hospital development site will be subject to s139 of the Heritage Act.

#### 2.1.3 State Agency Registers

Section 170 of the Heritage Act requires that Government agencies establish and maintain a Heritage and Conservation Register of their heritage assets. A government instrumentality must give the Heritage Council not less than 14 days written notice before the government instrumentality:

- a. removes any item from its register under section 170, or
- b. transfers ownership of any item entered in its register, or
- c. ceases to occupy or demolishes any place, building or work entered in its register.

Items on the register must be maintained with due diligence in accordance with State-Owned Heritage Management Principles.

Hotham House is not included on any State Agency Heritage and Conservation Registers.

#### 2.1.4 Interim Heritage Orders

Interim Heritage Orders (IHO) are provided for in Part 3 of the *Heritage Act 1977*. Interim Heritage Orders may be made for an item that may, upon further investigation, be a place has local or State heritage.

An IHO was applied to Hotham House on 23 November 2018 following public opposition to the proposed demolition of the building by Macquarie Health (DA18/0788). The development application was withdrawn and Sutherland Council commissioned Architectural Projects to undertake a heritage assessment of the place to determine if it was of local significance and eligible for heritage protection under the provisions of the Local Environment Plan.

The Interim Heritage Order remained active for 12 months and was followed by Sutherland Shire Council's decision to list the building in the LEP Heritage Schedule. This enabled heritage protection to remain while the LEP was amended to include the listing.

## 2.2 Environmental Planning and Assessment Act 1979 (NSW)

The *Environmental Planning and Assessment Act 1979* (NSW) (EP&A Act) provides for environmental planning and protection land use controls in NSW. Inter alia, the EP&A Act allows for creation of Environmental Planning Instruments (EPIs) to govern land use and facilitate the protection of the environment across a broad range of specific objectives, including heritage identification and protection. EPIs include District Plans, State Environmental Planning Policies (SEPPs) and Local Environment Plans (LEPs).

### 2.2.1 Local Environment Plans

LEPs are established under Division 3.4 of the EP&A and make provision for Local Council planning regulations. Most LEPs in NSW are based upon the NSW Government's standard model and include the same provisions for the protection of local heritage. The primary clause in this respect is Clause 5.10 (2), which states:

*(2) Requirement for consent*

*Development consent is required for any of the following—*

*(a) demolishing or moving any of the following or altering the exterior of any of the following (including, in the case of a building, making changes to its detail, fabric, finish or appearance)—*

*(i) a heritage item,*

*(e) erecting a building on land—*

*(i) on which a heritage item is located or that is within a heritage conservation area...*

As stated above, the provisions under 5.10 (2) require development consent for works affecting a Heritage Item identified in the Schedules attached to the LEP (typically Schedule 5) or Aboriginal Places (APs).

Hotham House and garden was listed as an item of local heritage significance in Schedule 5 of the *Sutherland Shire Local Environmental Plan 2015 (LEP)* on 3 April 2020, in accordance with Council's Community Strategic Plan and obligations under the South District Plan. The heritage listing appears to have followed due process including consultation with the owners of the property.

The *Sutherland Shire Development Control Plan 2015* does not contain specific objectives and controls for development of, or in the vicinity of, heritage items.

### **2.2.2 State Environmental Planning Policy (Planning Systems) 2021**

SEPPs are established under Division 3.3 of the EP&A.

Introduced last year, the SEPP (Planning Systems) 2021 has incorporated the functions of the former the SEPP (State and Regional Development) 2011 which provided for the declaration of development as State Significant Development (SSD).

The State Significant Development process provides an alternative approval pathway for projects that are deemed to be significant at a state level. President Private Hospital has an estimated capital investment value of \$46million, exceeding the \$30million threshold for consideration of hospital development for SSD.

The provisions of Local Environment Plans can be overridden by a SEPP where the use of land is consistent with the intent of the SEPP and the area is not State heritage listed Item. The use of Hotham House for hospital purposes is permitted with consent within the SP1 zoning defined in the Sutherland LEP 2015.

### **2.2.3 Greater Sydney Commission – South District Plan**

The South District Plan includes a 20-year plan for the area of Canterbury-Bankstown, Georges River and Sutherland. The plan gives effect to the Greater Sydney Region Plan and provides planning priorities and actions under Section 3.4 of the EP&A Act.

The plan provides strategic guidance for the economic, social and environmental development within the district with priorities for transport, infrastructure, land use, housing, health, education, heritage and environment. It identifies planning priorities for the district and actions to achieve those priorities. Relevant planning authorities are required to consider the priorities, objectives and actions set out within the District Plan.

In regard to heritage matters, the following Planning Priority is provided:

*Planning Priority S6. Creating and renewing great places and local centres, and respecting the District's heritage.*

Planning Proposals are required to demonstrate how they give effect to all the relevant priorities and actions of the District Plan. Implementation of the priorities, objectives and actions are the responsibility of Councils, planning authorities, state agencies and State-owned corporations. Relevant heritage objectives and actions for the President Private Hospital development are as follows:

**Objective 18.** *Using a place-based and collaborative approach throughout planning, design, development and management, deliver great places by:*

- d. integrating social infrastructure to support social connections and provide a community hub*
- e. recognising and celebrating the character of a place and its people.*

**Objective 20.** *Identify, conserve and enhance environmental heritage by:*

- a. engaging with the community early in the planning process to understand heritage values and how they contribute to the significance of the place*
- b. applying adaptive re-use and interpreting of heritage to foster distinctive local places*
- c. managing and monitoring the cumulative impact of development on the heritage values and character of places.*

Whilst the EPI does not prohibit the demolition of heritage items, it places the responsibility on approval authorities to consider whether the SSDA for President Private Hospital considers the South District Planning Priority S6 in balance with other priorities for development within the district.

#### 2.2.4 State Significant Development

State Significant Development is defined under Division 4.7 of the EP&A Act. Clauses 4.38(2) and 4.38(3) establish that consent may not be granted for State Significant development if the development is wholly or partly prohibited by an EPI. Such would be the case for an application to demolish a local heritage item where an LEP requires Council approval. Clause 4.38(5), however, provides for the Planning Secretary to provide consent if the relevant EPI preventing the demolition is appropriately amended eg. the heritage listing of Hotham House is removed. The decision to amend the LEP may only be made by the Independent Planning Commission.

### 2.3 Timeline of development applications and heritage listing

Date	Event
1993	Hotham House identified for heritage listing in Sutherland Heritage Study by Perumal Murphy Wu; listing did not proceed at this time.
1994	Purchase of Hotham House by applicant.
August 2013	SSLEP (v2) exhibited with Hotham House as a draft Heritage item.
August 2014	Independent review did not support listing of Hotham House.
23 June 2015	SSLEP 2015 gazetted without Hotham House as a heritage item.
3 July 2018	DA18/0788 lodged with Sutherland Shire Council seeking demolition of Hotham House for construction of a hospital carpark. 84 public submissions were received objecting to the demolition, many on the grounds of heritage significance. DA withdrawn by applicant.
23 November 2018	Interim Heritage Order gazetted allowing Council time to conduct a detailed heritage assessment

Date	Event
15 March 2019	Council receives letter from Macquarie Health advising of plans to substantially redevelop the site offering retention of pine tree and pathway and inclusion of interpretation of site's history.
1 April 2019	Council passes motion to submit planning proposal to amend the LEP to include Hotham House as a heritage item.
28 May 2019	SEARs issued with requirement to consider draft heritage items.
24 June 2019	Gateway Determination of Council's planning proposal with condition to update LEP within 6 months
3 July 2019 – 1 August 2019	Exhibition of draft heritage item
29 July 2019	Meeting held between Sutherland Council and landowner
11 September 2019	State Design Review Panel (SRDP) 1
6 November 2019	SDRP 2
2 December 2019	Council passes motion to proceed with listing and update
10 March 2020	SDRP 3
3 April 2020	Hotham House and garden included in LEP
10 December 2020	SSD lodged to DPE - 10/12/2020
29 January 2021	Council's provides submission on exhibition of SSD10322
21 May 2021 – 2 March 2022	Applicant provides various RtS reporting addressing heritage options

## 3 Review of Significance of Hotham House

### 3.1 Background to Assessment

In NSW, heritage significance is assessed using the eight criteria determined by the NSW Heritage Council and enshrined in the Heritage Act. The guideline document "Assessing Heritage Significance" is published by the NSW Heritage Office (now Heritage NSW) and provides detailed advice and guidance in the Assessment process.

The eight Assessment criteria are:

Criterion (a) – *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)*

Criterion (b) – *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)*

Criterion (c) – *An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (or the local area)*

Criterion (d) – *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*

Criterion (e) – *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)*

Criterion (f) – *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)*

Criterion (g) – *An item is important in demonstrating the principal characteristics of a class of NSW's cultural or natural places; or cultural or natural environments (or a class of the local area's cultural or natural places; or cultural or natural environments)*

The degree of significance is considered qualitatively, with items assigned either a Local or State level of significance. State significance means significance to the people of NSW. Local significance means significance within the local government area. Some items of local significance may have values that extend beyond the local government area, or need a wider contextual consideration. Where this is the case, these values should be identified and included in the statement of heritage significance.

### 3.2 Basis of Review

The primary Heritage Assessment that has provided a basis for listing Hotham House in the Heritage Schedule of *Sutherland Shire Local Environmental Plan 2015* was:

Architectural Projects; *65 Hotham Road, GyMEA Heritage Assessment Review*; March 2019; Report for Sutherland Shire Council.

This report was then reviewed and critiqued by consultants on behalf of the site owners in a second report:

GBA Heritage; *65 Hotham Road, Gymea; Statement of Heritage Impact*; May 2021; report for Macquarie Health

These two reports are compared and considered in the following section.

### 3.3 Background to Listing

In 1993, the first comprehensive heritage study of Sutherland Shire was undertaken by consultants Perumal, Murphy and Wu. In this study, 65 Hotham Road was identified as being of heritage significance as a good example of a large, individually designed, Inter-War brick house. It was recommended that it be listed as a heritage item in the Local Environmental Plan. The heritage amendment was exhibited for public input and the then owner of the property objected to its inclusion as a heritage item. In the absence of a detailed heritage assessment, Council resolved not to pursue the heritage listing of the property at that time.

The first version of the current plan, *Sutherland Shire Local Environmental Plan 2015* was exhibited in March-April 2013. It did not contain any reference to 65 Hotham Road, Gymea. A submission was subsequently received requesting the heritage listing of the property. Officers did not support the inclusion of the building because it was not supported by sufficient information regarding the significance of the item. However, Council resolved to include the building within the draft plan.

Version 2 of the LEP was exhibited in August 2013 and included 65 Hotham Road Gymea as a draft heritage item. An Independent Review completed in August 2014 did not support the inclusion of 65 Hotham Road, Gymea as a heritage item, stating (in part): *"It is not sufficient grounds for listing... that the owner of the property, or a member of the public, has requested it.... The properties at ... 65 Hotham Road, Kirrawee should not be listed as heritage items, unless an expert report nominates the criteria that would justify the listing."* The plan was gazetted without 65 Hotham Road on 23 June 2015.

In September 2018, following receipt of a Development Application for the President Private Hospital which proposed demolition of Hotham House, Sutherland Council sought an Interim Heritage Order (IHO) to stop demolition of Hotham House, to enable Council to undertake a review of the heritage value of the property for possible listing on the LEP and to engage in talks with Macquarie Health to seek preservation and adaptive reuse of the house.

Council commissioned Heritage Consultants to prepare a Heritage Assessment of the property. Architectural Projects Pty Ltd reported to Council on 19 March 2019. They recommended that the property be heritage listed. Council proceeded to enter the *"Hotham House - house and garden"* at 65 Hotham Road, Gymea on Schedule 5 of Sutherland Shire LEP 2015, item No. 1510.

### 3.4 Primary Statement of Significance

The following Statement of Significance was provided by Architectural Projects Pty Ltd for the *"Hotham House - house and garden"* and is the same as that in the Sutherland Shire Council Heritage Data Form for the Sutherland Shire LEP 2015:

#### CRITERION A

*The house and site at 65 Hotham Road have historic significance at a local level for their ability to evidence an early poultry farm in the Sutherland Shire. It is significant for its associations with the early development of poultry farming. The site evidences the early leasehold rural development, and occupation of the 5 acre lots on the Holt Sutherland estate between Sutherland and Sylvania. The house was built as the homestead to Hotham Farm, where under Tildesley, Turner and King, significant advances were made in poultry breeding and raising.*

*The house provides a link to the time when poultry farming was the main primary industry in Sutherland Shire. Hotham Farm represents the most successful primary industry in the district, - a landmark business of local and state importance. Hotham House is a reminder of the importance and the relative prosperity of some poultry farmers at this time.*

*The house and its setting reflect the growing affluence of the area during the boom years, the first phase of suburbanisation post 1911. The dwelling, and particularly the ballroom, has historic significance at a local level for its ability to illustrate a way of life, and an aspect of social life in Sutherland at the beginning of WWI. Hotham House was an important social centre for local people in an isolated area. Originally built to host Starr Bowkett Society events and parties (Tildesley Period), the ballroom later accommodated Parish Dances and Balls. (Turner period) The house provides evidence of both the social and economic life of the time prior to the construction of the Sutherland/Cronulla railway branch line.*

#### CRITERION B

*The house has important historic associational significance through the associations with Hotham Farm, and with Arthur Tildesley, and later owners Frederick Turner and Joe King. Tildesley built the house and ballroom and established Hotham Farm, which was at one time the largest poultry farm in the state. Tildesley was well known locally before and after his incarceration. His court case attracted great interest in the press. Subsequent owners Turner and King made significant advances in poultry farming during their time at Hotham House and farm.*

#### CRITERION C

*The house and garden at 65 Hotham Road have aesthetic significance at a local level as a fine and substantial local example of a late Federation period house constructed in the Federation Bungalow style, in a garden setting. The Norfolk Island Pine and circular path contribute to the setting.*

#### CRITERION D

*The house has social significance at a local level, and is remembered well by many older residents, because of its former uses, and rarity. Some community groups have shown interest in the building and site. The history of the building has been recorded in historical society publications. The building was proposed for heritage listing prior to the demolition proposal.*

#### CRITERION F

*The house has rarity significance at a local level. Few original rural homesteads survive in the locality. The ballroom is a rare element on this type of residence and in the LGA.*

#### CRITERION G

*The house and garden setting have representative significance at a local level as a fine example of substantial and intact federation bungalow.*

### 3.5 Comparison of Significance Assessments

In May 2021, GBA Heritage provided a Heritage Impact Assessment of the proposed development (including the demolition of Hotham House) on behalf of Macquarie Health Corporation. This heritage impact assessment is described, in its own content, as a detailed, independent Peer Review of the Architectural Projects Pty Ltd Heritage Assessment. The aim of the Peer Review was “to ensure that Council had as comprehensive an understanding of the place as possible before it came to any conclusions”<sup>1</sup>. The GBA Review found a number of points where its conclusions differed from those in the Heritage Assessment by Architectural Projects and GBA produced an alternative Assessment of Significance against the Criteria in Section 4.3 of the GBA report.

These two assessments are presented alongside each other in the Tables below:

**Table 1: Comparison of Assessments against NSW Significance Criteria**

Architectural Projects Assessment	GBA Heritage Assessment
<i>Criterion (a) – 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)</i>	
<p>The 1912 house and site have historic significance at a local level for their ability to evidence an early poultry farm in the Southland Shire and the early leasehold rural development and occupation of the Holt Sutherland Estate. The report asserts that the Hotham Farm at the subject site represents the most successful primary industry in the district and is a landmark business of local and state importance. In addition, the report considers that the house was an important social centre the local people in an isolates area. For instance, the ballroom was used to host parties and Parish dances and balls.</p>	<p>The House, circular path and driveway location are all that remain of the circa.1913 development of home and poultry farm that occupied 20-acres of land, making it one of the largest poultry farms in the Sutherland area for a short period of time. As discussed in Section 2.0 of this report, the scale of the farm was the result of criminal activity and does not represent successful poultry farming within Sutherland. The remaining House holds no evidence of the previous farm, or the previous leasehold suburban development. The evidence provided regarding the social aspect of the “Ballroom” has been thoroughly questioned for its accuracy within Section 2.0 of this report.</p>
<i>Criterion (b) – 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)</i>	
<p>The house has historic associational significance through association with the Hotham Farm and its owners. Arthur Tildesley built the house and established Hotham Farm in 1912, which was at one time the largest poultry farm in the state. Tildesley was well known locally and was found guilty of</p>	<p>The House, like all, can be associated with its early owners; Albert Tildesley may have drawn much attention to himself via self-advertisements and criminal activities, which funded the establishment of the House and Farm. This does not make him a person of importance in the cultural or natural history of NSW or Sutherland Shire. Frederick</p>

<sup>1</sup> 65 Hotham Road, Gymea; Statement of Heritage Impact; May 2021; GBA Heritage

Architectural Projects Assessment	GBA Heritage Assessment
stealing funds from a building society in a court case which attracted interest in the press. The subsequent owners, Frederick Turner and the Joseph King, made significant advances in the poultry farming industry.	Turner and Joseph King were both admirable men, involved in minor advancements in their selected professions. This does not make them persons of importance in the cultural or natural history of NSW or Sutherland.
<i>Criterion (c) – An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (or the local area)</i>	
The house and garden have local aesthetic significance as a fine and substantial example of a late Federation period house constructed in the Federation Bungalow style in a garden setting to which the circular path contributes.	Hotham House is a pleasant example of late federation bungalow style which may be considered aesthetically pleasing.
<i>Criterion (d) – 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</i>	
The house has local significance because of its former uses and rarity.	The House has some association with previous Poultry Farming community of Sutherland. However, as discussed previously, other social community links have not been adequately proven.
<i>Criterion (e) – 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)</i>	
[No values identified]	Not relevant to the subject house and garden.
<i>Criterion (f) – 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)</i>	
The house has local rarity significance because few original rural homesteads survive in the locality and since the ballroom is a rare element for this type of residence and for the wider LGA.	The House is relatively rare federation home within GyMEA, although as shown in the comparisons in section 4.2 not rare within Sutherland Shire itself.
<i>Criterion (g) – An item is important in demonstrating the principal characteristics of a class of NSW’s cultural or natural places; or cultural or natural environments (or a class of the local area’s cultural or natural places; or cultural or natural environments)</i>	
The house and garden setting have local representative significance for being a fine example of a substantial and intact federation bungalow.	Hotham House integrity may be better defined as relatively intact, as shown in Section 3.0 of this report.

**Table 2: Comparison of Statements of Significance**

Architectural Projects	GBA Heritage
The Assessment of Significance of "Hotham House", 65 Hotham Road, Gynea, confirms that the house and garden meet the threshold for listing as a Heritage Item in the Local Environmental Plan.	Hotham House is a fine and relatively intact example of a federation bungalow, which holds aesthetic significance at a local level. Its front circular pathway and lawn contributing to its streetscape setting. It has associations with the previous Hotham Farm, one of the larger poultry farms located within Sutherland Shire.

### 3.6 Analysis of GBA Arguments

**Table 3: Analysis of GBA Arguments**

Statement	Discussion
<i>Criterion A - Historic Significance</i>	
<i>The House, circular path and driveway location are all that remain of the circa.1913 development of home and poultry farm that occupied 20-acres of land, making it one of the largest poultry farms in the Sutherland area for a short period of time."</i>	GBA makes the point that, even if the Poultry Farm was, as claimed by its then owner, the largest in the State, it was so for only a short time. Secondly, there were other contenders for this claim which, owing to the passage of time, cannot be compared today, hence GBA propose that the ambit of the claim be reduced to: "...one of the largest poultry farms in the Sutherland area"
<b>Conclusion: Both of GBA's assertions in this regard are acceptable.</b>	
<i>As discussed in Section 2.0 of this report, the scale of the farm was the result of criminal activity and does not represent successful poultry farming within Sutherland.</i>	The source of the funds is not relevant to the historical significance of the place. The malfeasance of individuals such as Ben Boyd, Alan Bond and many others throughout Australian history does not lessen the impact of their works and their role in the historical development of the locality or the nation. It is impossible, at this time, to determine whether the success of the farm was directly related to the illegally-derived funds or whether the farm was successful in its own right and any link between the success of the farm and the illegal funds remains unproven.
<b>Conclusion: The land-owner's criminality is not a relevant constraint upon the historical significance of the poultry farm in its context.</b>	
<i>The remaining House holds no evidence of the previous</i>	Whilst this is superficially true in relation to physical material, the house and its history remain as evidence of the farm. The same

Statement	Discussion
<p><i>farm, or the previous leasehold suburban development.</i></p>	<p>qualification could be said of Elizabeth Farm Cottage, Experiment Farm Cottage and many other former homestead buildings now surrounded by urban development. It could be argued, in fact, that the survival of the house increases its significance as evidence of the farm and of the previous leasehold suburban development</p>
<p><b>Conclusion: The disappearance of the farm associated with the house does not lessen the current historical significance of Hotham House. Rather, it increases its significance as the only, or one of the few, surviving buildings in the district that holds associations with these historical phases.</b></p>	
<p><i>The evidence provided regarding the social aspect of the "Ballroom" has been thoroughly questioned for its accuracy within Section 2.0 of this report."</i></p>	<p>Whilst GBA does question the accuracy of the use of the term 'ballroom', particularly in the context of the several references to it being a 'Billiards Room', nonetheless, the report by Architectural Projects refers to the evidence provided by Mick Derrey's "<i>A.H. Tildesley's Hotham Poultry Farm</i>", published in the Sutherland Shire Historical Society Bulletin, November 1984, as the source of this reference. Derrey wrote of how he would never forget hearing Albert Tildesley sing on social evenings and how <i>'his voice would echo down through the gully towards North West Arm.'</i><sup>2</sup></p> <p>Further research identifies a newspaper report in 1937 which describes a Turner family wedding: "<i>The reception was held at Hotham Farm Homestead, the ballroom of which was tastefully decorated with festoons of pink and mauve flowers with streamers of the same shades</i>"<sup>3</sup>. Similarly, in 1932, "<i>Thanks to Mrs. Turner and family, who so generously loaned their home in Hotham Road, and the ladies who worked so unremittingly, the party held by the St. Patrick's Younger Set on Tuesday, 9th February, was a tremendous success.</i>"<sup>4</sup> These two references (the first notably referring to the 'ballroom'), as well as the 'surprise party for Miss Corrie Starr'<sup>5</sup>, referred to by GBA, all included dancing as part of the entertainments. The room may not have been used strictly for 'balls' in the formal sense but this does not lessen its potential importance as a venue for local entertainments at a certain period in its life. Its importance locally was as a focus and symbol of middle-class values amongst a farming community, a colonial expression of the traditions of English society.</p>

<sup>2</sup> Mick Derrey: "*A.H. Tildesley's Hotham Poultry Farm*"; Sutherland Shire Historical Society Bulletin; November 1984; cited in Architectural Projects; *65 Hotham Road, Gynea Heritage Assessment Review*; March 2019

<sup>3</sup> The Propeller; 28 Oct 1937; LOCAL WEDDINGS; via Trove

<sup>4</sup> The Cronulla-Sutherland Advocate; 19 Feb 1932; ST. PATRICK'S YOUNGER SET.

<sup>5</sup> The St George Call; 30 Mar 1923; SURPRISE PARTY

Statement	Discussion
<p><b>Conclusion: Whether used formally for 'balls' or not, the Billiards Room appears to have been a local venue for entertainment and meetings during the ownership of Arthur Tildesley and Frederick Turner.</b></p>	
<p><i>Criterion B - Historic Associations</i></p>	
<p><i>The House, like all, can be associated with its early owners;</i></p>	<p>This is a self-evident statement of no particular weight.</p>
<p><b>Conclusion: Hotham House is like many other houses.</b></p>	
<p><i>Albert Tildesley may have drawn much attention to himself via self-advertisements and criminal activities, which funded the establishment of the House and Farm. This does not make him a person of importance in the cultural or natural history of NSW or Sutherland Shire.</i></p>	<p>This statement belies the importance of the farm as part of the historical development of the area and ex-post-facto belittles the then owner on the basis of his subsequent criminality. Close reading of the charges against Arthur Tildesley indicates that his embezzlement of funds from the Starr Bowkett Building Society occurred in the 1917 – 1927 period, well after the establishment of the farm. Although this does not preclude the possibility that his criminality began much earlier, there is no evidence that this occurred and the suggestion that his '<i>criminal activities... funded the establishment of the House and Farm</i>' is unfounded speculation.</p>
<p><b>Conclusion: Many prominent individuals in business are tireless self-promoters. This, and the subsequent charging of Arthur Tildesley with fraud, are not, in themselves, reasons to suggest that his impact locally was less than 'important'.</b></p>	
<p><i>Frederick Turner and Joseph King were both admirable men, involved in minor advancements in their selected professions. This does not make them persons of importance in the cultural or natural history of NSW or Sutherland.</i></p>	<p>This, again, tends to belittle the contributions of these individuals to the culture and economy of the local area. Clearly, judgements about the historic and social value, or otherwise, of individuals is a matter of great subjectivity and it is open to GBA to assign a lower weight to their significance than may have been given by others. In any case, both were, in their turn, proprietors of a large local poultry farm, one of the largest (if not the largest) in a district in which poultry-raising was the primary local industry. In this regard, they were not insignificant members of the Sutherland community.</p>
<p><b>Conclusion: Frederick Turner and Joseph King were not persons of great significance, however, as proprietors of one of the largest (if not the largest) poultry farms in a district in</b></p>	

Statement	Discussion
<p><b>which poultry-raising was the primary local industry, they were not insignificant members of the local community.</b></p>	
<p><i>Criterion C – Aesthetic Significance</i></p>	
<p><i>Hotham House is a pleasant example of late federation bungalow style which may be considered aesthetically pleasing.</i></p>	<p>GBA has identified that Hotham House has some aesthetic values, which correlates with the assessment by Architectural Projects.</p>
<p><b>Conclusion: The assessments by GBA and Architectural Projects are largely in agreement on this point.</b></p>	
<p><i>Criterion D – Social Significance</i></p>	
<p><i>The House has some association with previous Poultry Farming community of Sutherland. However, as discussed previously, other social community links have not been adequately proven.</i></p>	<p>GBA has identified that Hotham House has some social values but questions the role of the House in local community activities. In coming to this conclusion, GBA appear to have largely discounted the Mick Derrey memoir (see 3.3.1 above) and go on to state that: <i>"No evidence of the 'Ballroom' being utilised for 'Parish Dances and Balls' has been provided or found. Therefore, claims that it represents the social and economic life of the time are completely unjustified."</i> Reference to the article in the Cronulla-Sutherland Advocate of 19 February 1932 entitled "ST. PATRICK'S YOUNGER SET" is evidence, albeit singular, of the use of the house for parish social events. Given the locality and the relatively sparse community in Sutherland in this period, it is unsurprising that there are few public references to such activities.</p> <p>The comments by GBA appear to undervalue the reliability of the Mick Derrey memoir (characterised in the report as <i>"only [a] secondary source"</i>), insofar as GBA's research did not identify any corroborative evidence for the information in the memoir. Research undertaken for this report identified a single reference which immediately contradicts GBA's assertion and, clearly, there is no motivation for the memoir to fabricate such information. Consequently, it is accepted that the house historically had some, unquantified, level of community use.</p> <p>Second, the Architectural Projects statement alludes to an additional dimension not addressed by GBA, which relates to the efforts of the present community to ensure that the significance of</p>

Statement	Discussion
	<p>the house is recognised by its listing as a heritage item<sup>6</sup>. This relies upon the submissions from the community regarding the preparation of the Sutherland LEP 2015 and subsequently, as well as the holdings of the Sutherland Shire Historical Society in relation to the house.</p>
<p><b>Conclusion: GBA’s assertions in relation to the social significance attached to Hotham House are not supported.</b></p>	
<p><b>Criterion F - Rarity</b></p>	
<p><i>The House is relatively rare federation home within Gymea, although as shown in the comparisons in section 4.2, not rare within Sutherland Shire itself.</i></p>	<p>GBA has identified that there are other substantial Federation-period houses in the Sutherland Shire, although none of the scale of Hotham House in its immediate vicinity. GBA cites five comparative examples, although no photographs were provided: 94 Acacia Road Kirrawee; 16 Bellingara Road, Miranda; 104 Toronto Parade, Sutherland; 88-90 Toronto Parade, Sutherland; and 89 Woollooware Road South, Woollooware. Of these, only one, 94 Acacia Road, Kirrawee, is associated with a former rural industry, the others representing the subdivisions of their localities. These are shown in the photos in Figures 4 – 8 below.</p> <p>Overall, it is difficult to conclude otherwise than that Hotham House is relatively rare in its vicinity, both as a substantial Federation Bungalow style residence and as a surviving homestead for a rural industry. Further, if the five buildings identified by GBA are the comparison buildings across the Sutherland Shire, then it is clearly relatively rare within the shire, as two of the examples, while dating from the Federation period, are Late Victorian Georgian in general form and architecture, with some ‘Federation’ details. Two others are ‘suburban block’ buildings which do not express the spatial qualities of the design of Hotham House, designed to sit within a more spacious context.</p> <p>At the same time, the suggestion by Architectural Projects that the <i>“the ballroom is a rare element for this type of residence and for the wider LGA”</i> overstates the importance of this element as part of the house – research undertaken by Architectural Projects, GBA and for this Review all suggest that it was a large room used variously for billiards, parties, dances and general entertainments</p>
<p><b>Conclusion: The assessments by GBA and Architectural Projects are largely in agreement on this point, with minor differences in emphasis.</b></p>	

<sup>6</sup> See also: The St George and Sutherland Shire Leader, AUGUST 9 2018: *“Storm of criticism over plans to demolish Hotham House at Kirrawee so car park can be built”*; and The St George and Sutherland Shire Leader, JANUARY 27 2021; *“Last-ditch appeal to stop demolition of Hotham House”*

Statement	Discussion
<b>Criterion G - Representativeness</b>	
<i>Hotham House integrity may be better defined as relatively intact, as shown in Section 3.0 of this report.</i>	This statement by GBA is a refinement of the original statement by Architectural Projects. Elsewhere, GBA states that: " <i>Hotham House is a fine and relatively intact example of a federation bungalow, which holds aesthetic significance at a local level</i> ". Consequently, except in terms of the degree of intactness of the building, GBA and Architectural Projects are largely in agreement.
<b>Conclusion: The assessments by GBA and Architectural Projects are largely in agreement.</b>	



**Figure 4 - 94 Acacia Road Kirrawee (Source: GoogleStreetview)**



**Figure 5 - 16 Bellingara Road, Miranda (Source: GoogleStreetview)**



**Figure 6 - 104 Toronto Parade, Sutherland (Source: GoogleStreetview)**



**Figure 7 - 88-90 Toronto Parade, Sutherland (Source: GoogleStreetview)**



**Figure 8 - 89 Woollooware Road South, (Source: GoogleStreetview)**

### 3.7 Summation of Analysis

In the first instance, it is important to note that both the assessments by Architectural Projects and GBA conclude that Hotham House has heritage significance at the local level. They are largely in agreement with respect to Criterion C – Aesthetic Significance, Criterion G- Rarity Significance and Criterion G – Representative Significance. It is noted that GBA only gives weight to the Aesthetic Significance in its Heritage Impact Assessment of the proposed development.

In relation to Criterion A – Historic Significance, GBA’s qualification of the size of the poultry farm to: *“...one of the largest poultry farms in the Sutherland area”* is reasonable and is accepted. However, GBA’s assertion that the criminality of the original owner diminishes the historic significance of the building is not accepted, as this matter has little bearing on the actuality of the farm and the house. Equally, GBA’s assertion that there is no reliable evidence of the use of the house for local (parish) social events has been largely disproved and should be discounted. GBA’s assertion that the loss of the farm negates the house’s association with its origins is also not accepted, on the basis that the house and any documentary evidence relating to the history of the house memorialises the farm to which it was once attached. It has this character in common with many other important heritage places.

In relation to Criterion B – Historical Associations, GBA’s assessment of the relative importance of the individuals associated with the Farm adopts a critical position, especially in relation to the criminality of Arthur Tildesley and the local prominence of the later owners. This is at odds with the position adopted elsewhere that Hotham Farm was *“one of the largest poultry farms in the Sutherland area”*. Consequently, it is concluded that, whilst not the individuals are not of state or national importance, the owners of Hotham Farm were not insignificant in the local context.

In relation to Criterion D – Social Significance, GBA’s assertion that there is no reliable evidence of the use of the house for local (parish) social events has been largely disproved (see Section 3.1.1 above) and should be discounted. GBA do not address the issue of contemporary social significance (which is the focus of this Criterion), as evidenced by local efforts to have the heritage values of Hotham House recognised by inclusion in the LEP.

### 3.8 Proposed Updated Assessment of Significance

As a result of the analysis and comparison of the foregoing assessments and arguments, the following updated Assessment and Statement of Significance is proposed.

*CRITERION A – 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)*

The house and site at 65 Hotham Road have historic significance at a local level as evidence of an early poultry farm in the Sutherland Shire. It is significant for its role in the early development of poultry farming in the vicinity and as evidence of the early leasehold rural development and occupation of the 5 acre lots on the Holt Sutherland estate between Sutherland and Sylvania. The house was built as the homestead to Hotham Farm, one of the largest poultry farms in the Sutherland area for a period.

The house and its setting reflect the growing affluence of the Sutherland area during the first phase of suburbanisation, post 1911. The dwelling, with its billiards/ballroom, hosted local social and fund-raising events and represented a level of gentility in the working-class community, illustrating some aspects of the social patterns and social mores in Sutherland in the early twentieth century, when the area was a remote farming settlement.

*CRITERION B – 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)*

The house is associated with Hotham Farm and with Arthur Tildesley, who was prominent locally and later achieved notoriety for his embezzlement of funds from the Star-Bowkett Building Society. Later owners, Frederick Turner and Joe King, were notable local poultry farmers, in a poultry farming area, during their time at Hotham Farm.

*CRITERION C – An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (or the local area)*

The house and garden at 65 Hotham Road have aesthetic significance at a local level as a substantial local example of a late Federation period house constructed in the Federation Bungalow style. The circular path contributes to the setting.

*CRITERION D – 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*

The house has social significance at a local level, as local community groups have demonstrated interest in the building and its history, which has been recorded in historical society publications. The building was proposed for heritage listing prior to the demolition proposal and local groups have protested its proposed demolition on heritage grounds.

CRITERION E – *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)*

No values identified.

CRITERION F – *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)*

Hotham House is relatively rare in its vicinity, both as a substantial Federation Bungalow style residence and as a surviving homestead from a historically important local rural industry.

CRITERION G – *An item is important in demonstrating the principal characteristics of a class of NSW's cultural or natural places; or cultural or natural environments (or a class of the local area's cultural or natural places; or cultural or natural environments)*

Hotham House is a fine and relatively intact example of a Federation Bungalow style residence.

#### *SUMMARY STATEMENT OF SIGNIFICANCE*

Hotham House is a relic of Hotham Farm, one of the larger poultry farms located within Sutherland area, where poultry farming was a significant local industry in the early twentieth century. The building was, for a time, one of the grander residences in the locality and was notable for its role in local social events and as a symbol of middle-class values in a working-class area. It is a fine and relatively intact example of a Federation Bungalow style residence, a relatively rare surviving building type in its locality.

## 4 Review of Options and Constraints

### 4.1 Background

An exploration of options for the potential retention of Hotham House was requested by NSW Planning, Industry and Environment in letter dated 12/02/2021.

*"Hotham House was only recently listed in Sutherland Local Environmental Plan 2015 as a local heritage item and is highly regarded by the local community. Opportunities for the inclusion/ retention of Hotham House (i.e. adaptive reuse of the building) in the overall design is to be further investigated and presented demonstrating, through revised schemes, that all options have been considered."*<sup>7</sup>

Macquarie Health commissioned Imagescape Design Studios to produce a review of options available in relation to the DPIE request. This was provided in a report titled: *"Design Options for Retention of Hotham House"*, dated 12/07/2021. These Design Options were further elaborated and examined in the Heritage Impact Assessment report by GBA Heritage (op cit).

### 4.2 Imagescape Design Studios Options

The Imagescape Design Studios (IDS) report canvasses two retention options for Hotham House, one within the current proposed layout of the redeveloped hospital and one in which the proposed layout is altered to include retention of the House.

The first option does not change the proposed hospital design, apart from a relocation of an access roadway, and identifies the impacts upon the proposed design caused by the retention of Hotham House. This produces a list of elements of the design that cannot proceed. No adaptive reuse of Hotham House is considered within this option.

The second option is similar, in that it rearranges the current proposal around the need to retain the house. The result is a list of reasons that the proposed new development would be adversely affected. No adaptive reuse of Hotham House is considered within this option.

Both of these Options, as presented, retain Hotham House but do not actively pursue *"the inclusion/ retention of Hotham House (i.e. adaptive reuse of the building) in the overall design"*. Whilst it is acknowledged that the retention of Hotham House would have an adverse impact on the current proposed future design of the hospital, the redesign of the proposed Hospital to include Hotham House as part of the future hospital does not appear to have been contemplated.

### 4.3 GBA Options

The GBA report, in Section 5.0, considers the two options identified by the IDS report and it elaborates on the adverse impacts associated with these two options. It also revives two options from an earlier (2018) redevelopment proposal which considered the retention of Hotham House as part of a smaller (than currently proposed) redevelopment of the Hospital. Again, these options are presented as

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<sup>7</sup> Correspondence – DPIE to Macquarie Health 12/02/2021; cited in GBA op cit

examples of how the retention of Hotham House would adversely affect the proposed future hospital design.

It is noted that, in each case, the one of the constraints upon the proposed redesign of the Hospital cited in the GBA report is that the south-west corner of the site is potentially affected by 'flooding issues' arising from the former watercourse that traverses the site in this area, making it unsuitable for any practical use. However, a western carpark is proposed for this area and the rest of it (currently occupied by the Therapy Gymnasium, which is to be demolished) is shown as a planted area with an overland stormwater flowpath. No information has been provided as to the frequency and severity of such 'flooding issues', nor whether there are alternative approaches to management of the stormwater issues which may allow more extensive use of this area, even for car parking, as part of the operation of the Hospital.

#### 4.4 BCA Report

The BCA report prepared by Blackett Maguire + Goldsmith in July 2019 only examines the use of the building as a Class 9A hospital inpatient unit and thus applies the most unlikely use for the building, with some of the highest constraints on building performance. This limits the applicability of the report in examining more viable options for reuse, such as offices or a medical suite, which could be considered Class 5 although BCA classification is not the sole determinant to finding the most appropriate use for the building.

The following table lists the issues and constraints identified in the Blackett Maguire + Goldsmith report and provides, in the adjacent column, a prima-facie response, based upon a wide experience of heritage architecture, which considers how this issue may be resolved as part of an overall design solution which retains the building.

**Table 4: Review of BCA Report Issues**

Issue noted	Response
Site issues	
Fire and smoke compartmentation if connected to hospital	Compartmentation would be part of new development
Fire separation between buildings	Sprinklers can be installed in new development to achieve required protection of windows to avoid spread of flame.
Building issues	
Exit doors	<p>There is the potential that some doors could be changed to open outwards, although a fire engineered solution could retain the doors in the current format. The size of the building and its suitable use would also vary the requirement for egress as stated in the report.</p> <p>The advice of an experienced heritage architect is recommended.</p>

Issue noted	Response
<p>Accessibility</p>	<p>As a traditional building, it does not meet current AS1428.1 requirements. Modifications to the building are possible to provide compliant access, either as deemed-to-satisfy or by performance solution. These should be examined in determining viable and suitable uses for the place.</p> <p>Access to the building could be provided at the rear or side and a lift could be incorporated in the new design to mitigate the level changes from Hotham House to the proposed hospital floor levels.</p> <p>The advice of an experienced heritage architect is recommended.</p>
<p>Sprinklers including flush mounted sprinkler heads</p>	<p>Sprinklers can be installed in Hotham House if required. These can be sensitively incorporated into decorative ceilings where needed.</p> <p>The advice of an experienced heritage architect is recommended.</p>
<p>Health and amenity</p> <ul style="list-style-type: none"> <li>- Closure of air vents</li> <li>- Bathroom facilities</li> <li>- General safety issues</li> </ul>	<p>The report does not examine a viable or suitable future use for the building. The requirement for closure of air vents and anti-ligature design is not likely to be required by a 'suitable' use option.</p> <p>In any future use, access to toilet facilities will be required. As the building is quite small, a single accessible toilet may suffice for compliance. Toilet facilities may also be able to be provided within the new development or an extension to the building.</p>
<p>Australian Health Facility Guidelines are required for accreditation with NSW Health.</p>	<p>The guidelines are a mechanism to reach a standard and do allow flexibility in design outcomes to achieve a range of uses for heritage buildings in hospital settings.</p> <p>The advice of an experienced heritage architect is recommended in establishing significant fabric and the extent to which the building can be modified to accommodate new uses.</p>

### Discussion:

This option considers use of the building as an inpatient unit. This is likely to be an inefficient and unviable use of the space due to its distance from the hospital in the design presented. It contains only 4 beds and, as such, could not be independently and adequately staffed and it is recommended that the operator provide clinical advice supporting the consideration of this use. The use of building by mental health inpatients as mentioned in the BCA report is also unlikely due to the reasons stated above.

A 4-bed inpatient unit would only be justified for high acuity patients but it is even more unlikely to suit the building type and location away from other staff and hospital facilities. The options presented are the most unlikely to ever be feasibly implemented and this work should therefore be entirely discounted.

The options analysis did not examine the potential for changes to the building fabric internally, such as partial removal of walls or widening of doors. Larger spaces could be feasibly produced which would accommodate meeting rooms, offices, education and training, community and volunteer services.

**Conclusion:**

Under professional guidance from a heritage architect, it would be possible to allow for modification to doorways and achieve partial removal of walls to achieve required flexibility of use. Sprinklers can be installed and door furniture modified for compliance with the BCA. These actions are not precluded through heritage listing.

**4.5 Structural Report**

The structural report was prepared by MIEngineers in July 2019. The report is limited to a non-intrusive inspection of the exterior and portions of the interior, subfloor and roof-space. Internal inspection is limited to the current gymnasium (billiard room) and dirty utility (small room at southwest corner of the building).

The report provided a detailed inspection schedule with generally clear photographs, which allow for the reader to obtain a good understanding of the condition of the building insofar as it was inspected.

The following table provides a response, based upon a wide experience of heritage architecture, which considers how this issue may be resolved as part of an overall design solution which retains the building.

**Table 5: Review of Structural Report Issues**

<b>Noted structural issues</b>	<b>Response</b>
<b>Sub Floor and Footing</b>	
Drainage channel Water pooling in the sub-floor Brick pier missing Missing ant caps Debris Efflorescence	<p>There is evidence of recent works to the subfloor. These include the insertion of a concrete strip footing around the building and concrete pad footings to the piers in the area below the gymnasium (billiard room). The drainage channel may have been constructed after these works. The structural report correctly notes that a brick pier has been removed during recent works. Reconstruction of the pier is a minor task and the area is fully accessible</p> <p>The works appear to have included removal of sandstone footings, as earth and sandstone debris is piled in the subfloor area.</p> <p>Properly executed works would have included the installation of ant caps, removal of debris and resolution of drainage from the rear carpark. It may not have been necessary to install concrete footings and remove original fabric, if the advice of an experienced heritage practitioner had been sought prior to execution of the works.</p> <p>The installation of the concrete strip footing appears to have resulted in efflorescence on the lower courses of brickwork around the building. This can be due to a high calcium carbonate content in the recent footing, in</p>

Noted structural issues	Response
	<p>combination with damp in the lower level of the brick footing resulting from poor site drainage. Efflorescence can be unsightly but can be treated through resolution of site drainage and removal of mineral salt deposits. If the efflorescence is entirely as a result of the new concrete, the degree to which salts appear will reduce over time. It may be prudent to first clean the brickwork and if necessary, the brickwork can be desalinated. There is no obvious brickwork spalling in the photographs of the footings.</p>
<p>Old tree root growth</p>	<p>Tree growth and removal of trees adjacent to buildings can cause changes in ground conditions that cause masonry cracking. Whilst large trees can cause the soil around them to dry out, surface roots can also cause upward pressure on traditional shallow brick footings. Removal of trees will cause an increase in soil moisture.</p>
<p>Some piers have subsided or tilted</p>	<p>The subsided pier illustrated in the report is at the edge of the timber verandah floor and can easily be reconstructed or re-aligned. This is not an unusual occurrence where water is dispersed from the roof or surrounding area to around the perimeter piers.</p> <p>This is similarly the case with the minor subsidence of the front entry steps.</p> <p>Brick piers in the gymnasium subfloor have been subject to recent poorly executed works.</p> <p>Settlement of piers due to unstable ground conditions appears to be a result of the construction of the rear carpark, poor stormwater management generally and vegetation around the building.</p>
<p>Storage</p>	<p>Operational issue - not a building defect</p>
<p>Low clearance / Poor subfloor ventilation</p>	<p>Clearance below the floor of the building is per traditional construction. As noted, it does not meet code. There are no noted issues with damp inside the building due to poor air flow, however, this can be easily remedied with the installation of sub-floor fans and additional floor vents to the basement. The removal of the rear addition and resolution of site drainage would also assist.</p> <p>The construction of a ramp and garden bed adjacent to the building is not an inherent building defect but should be rectified prior to causing damage.</p>
<p><b>Comment:</b></p> <p>Whilst the subfloor and footings demonstrate some structural issues, there are few that are inherent ongoing failures of the building structure itself but, instead, demonstrate poorly executed works. Minor areas of failure such as the verandah pier are not unusual for a building of this age and can be easily remedied.</p> <p>Most issues are the result of cumulative site conditions resulting in minor settlement cracking and do not demonstrate any major structural defects that would warrant demolition of the building.</p>	

Noted structural issues	Response
<b>Exterior</b>	
Masonry cracking / Brickwork repairs	<p>The report illustrates masonry repair rather than extant cracking. This is generally highly visible due to the use of mortar repair products and or cementitious mortars which are not matched to the original colour.</p> <p>All cracking illustrated appears in mortar joints and not through brickwork. The width of the crack (or area of fill) is not significantly more than the width of the joint, indicating the movement is slight and the cracks are aesthetic (less than 5mm) rather than structural.</p> <p>Cracking appears to be the result of settlement and of lintel corrosion. Lintel replacement would not generally be required unless cracking was greater than 5mm and there was noted distortion in the header bricks. The current repairs could be removed and better executed to improve appearance.</p>
Damp in brickwork	<p>There are areas of excessive damp noted in the brickwork. This is generally evident around downpipes and on exposed walling where there has been failure of downpipes, gutters and flashing. Roof and site drainage should be remedied.</p>
Corroded roof sheeting	<p>The house has a corrugated metal roof with an overlay of pressed metal tile roof ("Decramastic"). It appears both roof layers are at the end of their life. The roof should be replaced with corrugated steel sheet.</p> <p>This is not an unusual, nor structural, defect.</p>
Gutters and downpipes	<p>Whilst gutter and downpipe dilapidation is not clearly illustrated, recent work has connected the downpipes to a stormwater drainage system, as evident by the PVC pipes at the base. Gutters and downpipes would generally have a 20 year life span and would be due for replacement.</p>
Cavity ties missing	<p>Cavity ties corrode over time, especially in locations where walls are exposed to driving rain or excessive damp. Excessive bowing out of walls is generally observed where there is failure of cavity ties, however, none is illustrated in the report.</p>
Verandah timber connection	<p>There is no demonstrated failure of the connection of the verandah roof. Strengthening of roof connections could occur during roof replacement.</p>
<p><b>Comment:</b></p> <p>Whilst Hotham House requires a roof replacement, there are no other major defects visible that demonstrate the need to demolish the house. Maintenance such as roof and gutter replacement should occur. A major renovation could occur in the future re-use of the house that would involve the removal of the intrusive addition and covered walkways to the rear and possible replacement with a better conceived solution.</p>	

Noted structural issues	Response
<b>Roof Space</b>	
Roof structure repairs and defects	The report notes only minor and isolated failures within the roof structure. These are noted over the gymnasium roof and may have been a result of the fire in the 1925 or additional suspended loads on the ceiling from the current use of the room.
<p><b>Comment:</b></p> <p>The roof space photographs do not illustrate any major structural defects that would warrant demolition of the building.</p>	
<b>Interior</b>	
Beam deflection (gymnasium)	The beam over the gymnasium has gymnasium equipment suspended from it, which could have substantially overloaded the bearing capacity of the beam.
Possible asbestos containing materials (ACM) in ceiling lining and vinyl floor covering	<p>As a house of this age with various additions, it is likely that there will be some ACM present. The photograph illustrated shows a fibrous plaster ceiling which is highly unlikely contain ACM.</p> <p>The vinyl floor covering is contemporary welded sheet vinyl and is highly unlikely to contain ACM.</p>
Damp ingress	Damp ingress is noted in the dirty utility at the southwestern corner of the building. This was part of the rear verandah, which traditionally would have housed a laundry and perhaps WC and may have only been single brick construction. Additionally, the skillion does not have eaves to protect the brickwork from the rain. External photographs illustrate damp in this wall may be due to failed or poorly constructed gutters and downpipes from the house and attached walkways.
<p><b>Comment:</b></p> <p>The interior photographs do not illustrate any major structural defects that would warrant demolition of the building.</p>	

**Discussion:**

Whilst the engineer’s report concludes that the house is structurally unstable and will require substantial maintenance, the photographs of the building do not provide adequate evidence of this instability, although they illustrate that it does require external maintenance. None of the maintenance required is unusual for a building of its age.

It provides three options for the building including:

Option 1: Ongoing maintenance as currently provided but upgrade with better methods of repair.

*Ongoing maintenance comprises only that work which is essential for structural stability and safety. This option assumes that the existing metal roof remains and is remediated as needed, and the existing ceiling remains intact.*

- i. *Roof drainage management.*
- ii. *Site stormwater water management.*
- iii. *Brickwork remediation*
- iv. *Window and door steel lintels*

*Estimated total ongoing maintenance repair costs, say \$100,000. The items listed above will be additional work covered by the general Hotham House maintenance.*

Option 2: Remedial repairs, involving repair of damaged brickwork and replacement using accepted repair techniques, as well as repair of other structural elements.

- i. *Roof replacement /management.*
- ii. *Site stormwater water management.*
- iii. *Brickwork remediation*
- iv. *Partial underpinning*

*Estimated total ongoing maintenance repair costs, say \$450,000. The items listed above will be additional work covered by the general Hotham House maintenance*

Option 3: Demolish and repair

*Totally demolish, site remediation and replace to replicate original historical fabric of Hotham House. Estimated cost, say \$ 1,200,000 to \$1,600,000.*

## **Conclusion:**

Option 1 and 2 cover the required works to Hotham House. It appears that remedial work to most of the brickwork has been completed, albeit in a less than sympathetic manner for a heritage item, and that underpinning is not necessary, due to the already existing concrete footing that has been installed, and that there is no substantial structural failure evident in the building. Roof, gutter, downpipe and flashing replacement is required in the short term.

Site stormwater management would be rectified as part of site redevelopment, as would removal of intrusive additions at the rear of the building.

*Helou v Strathfield Council [2006]* provides comparable legal precedent that the cost of repair of a heritage building is not a justification for demolition and does not impose undue financial burden. In addition, the cost of rectification is trivial compared to the Capital Investment Value of the development at \$46million.

## **4.6 Access Report**

The access report prepared by Assistive Technology Australia in January 2019 does not address the adaptive reuse of Hotham House. It is noted that the 1970s constructed hospital had:

- no compliant access from the property boundary to the hospital entrances;
- no compliant accessible parking bays within any carparks; and
- no compliant access from carparks to hospital entrances.

It is advised that the 2019 proposal provides:

- Relocation of Principal Pedestrian Entrance (PPE) to northern side of site;
- Provision of compliant access from property boundary on Hotham Street to PPE;
- Provision of compliant lift access to west wing (rehab/OT);
- Provision of compliant Accessible toilet (AWC) to outpatient gym (west wing?); and
- Works to western carpark to provide compliant accessible car parking bays and compliant access from carpark to outpatients.

The report does not contribute to the presentation of any viable options for reuse of Hotham House, as it is assumed by the proponent in 2019 that the building would be demolished.

#### 4.7 Summation of Review

It is accepted, in the first place, that hospital design is a complex balance of operational objectives and functional constraints, in a highly regulated context. Ideally, any hospital is designed to the best available understanding of these elements. Macquarie Health embarked on its redevelopment program with the knowledge that Hotham House was in the process of being listed as a Heritage Item and it would be required to seek approval for demolition of the building and redevelopment of the site.

This site is not a greenfield site and the proposed new hospital is a significant development in what is otherwise a largely residential area. Consequently, it is self-evident that the proposed new design must be tempered by what is achievable within the constraints of the site. The options provided in the IDS and GBA report for the potential retention of Hotham House, however, do not respond to the constraint posed by Hotham House except insofar as to express how it prevents the current plans from proceeding as preferred by the proponent. Similarly, the Structural and BCA reports focus upon the negative aspects of the building and do not analyse how these could be addressed through remedial and alternative approaches.

It is not the task of this report to provide solutions to the constraints of the site, nor to make suggestions as to which parts of the proposed future hospital can be rearranged, reconfigured or replaced. However, it is apparent that a more developed design or a modified proposal which includes the retention and adaptive reuse of Hotham House may well be able to be achieved. In other contexts, such buildings have been utilised, for example, as child-care facilities, natural birthing centres and doctors' consulting rooms and are valued by the public for their human-scale and organic materials in contrast to the scale and severity of the full hospital. The best use of Hotham House as part of the President Private Hospital can only be determined by the Hospital itself, as part of its potential redevelopment.

## 5 Opportunities for adaptive reuse

### 5.1 What is adaptive reuse?

Adaptive reuse refers to the process and action of retaining and reusing a heritage place for a new purpose. It involves techniques which preserve the significant values of the place while accommodating changes to support a new use or change in technology and building codes.

### 5.2 Why retain places of local heritage significance?

Heritage places are crucial in terms of transferring the cultural identity for future generations. The local community, through the high number of submissions in opposition to the demolition, have demonstrated the place has a high social value and is important to the cultural identity of the community.

The sense of place and belonging attached to the retention of heritage places has been proven to positively impact the mental health and resilience of communities, contributing to long-term social sustainability. Where substantial new development is proposed which changes the setting of an area, the retention of familiar landmarks increases legibility of neighbourhoods and increases community support of, and engagement with, new development.

Retention of heritage places also contributes to environmental sustainability through recognition of the embodied energy contained in the existing structure.

### 5.3 What might successful adaptive reuse look like?

The successful adaptive reuse of Hotham House would retain the local character and identity of the former residence whilst providing a use within the building that supports or is allied to the expanded use of the site by the hospital. These uses might include community, allied health, hospital volunteer, outpatient social support, specialist study centre, childcare, offices, café or such uses as can be reasonably accommodated within the structure.

The existing structure has the potential to be altered internally and the more recent rear addition could be removed, providing opportunities for new architectural intervention. It is possible, given appropriate design solutions, that the former residence could be completely integrated with the new hospital development, providing efficiencies in site usage. Development incentives arising from the retention of heritage items can include increases in development height as compensation for a reduction in development potential around heritage buildings.

Partial retention, such as the retention of a façade or verandah, should be avoided as this does not retain an understanding of the form and decoration of the place, which contribute to an understanding of its significance. The pine tree and circular pathway are an important component of the setting of the place.

Further advice from an experienced heritage architect will assist the applicant and their designers to find appropriate adaptive uses and to integrate Hotham House and its garden to improve the amenity

of the proposed development. Adaptive reuse may also require advice from BCA and Access consultants and a Fire Engineer experienced in adaptive reuse, to explore opportunities and constraints provided by location, structure and construction.

## 5.4 Precedent Images

The following illustrations are all recent examples where a retained heritage building has been adaptively reused within a large redevelopment in NSW.



**Figure 9 – Maitland Hospital: streetfront building retained and integrated within the development of the new hospital.**



**Figure 10 – Affordable housing in Parramatta: Family housing and single bed units developed on one site**



**Figure 11 – Multistorey residential development and retained heritage building in Arncliffe**



**Figure 12 – Residential development Point Frederick, NSW**



**Figure 13 – Childcare centre, Airds, NSW: former residence adapted to child care centre.**



**Figure 14 – Mount St Vincent supported housing, Burraneer: house adapted to independent living units and community meeting space.**



**Figure 15 – Porter House, Sydney: former factory and offices adapted to bars and function rooms for hotel.**

## 6 Conclusions

### 6.1 Outcomes of Review

#### 6.1.1 Significance

The Assessment of Heritage Significance of Hotham House has been expressed by two reports, one of which adopts the widest possible expression of potential significance (Architectural Projects), the other of which (GBA) critiques the first, producing a much narrower result.

Review of these two reports has identified that, although some of the critique provided by GBA is justified, other elements are not supported by the evidence or are judgements based upon extraneous values. Both reports produce an outcome that, in any case, identifies that Hotham House has heritage significance at a local level only.

Local heritage listing does not preclude well-conceived modification of the building as part of an adaptive reuse. Nor does it mandate the retention of the building, if removal is warranted for reasons other than heritage significance.

#### 6.1.2 Structural Issues and BCA Compliance

Review of the Structural and BCA reports determines that they identify the structural and BCA problems of the building; they do not, however, pursue how these problems could be reasonably overcome or managed as part of a positive retention strategy.

#### 6.1.3 Retention Options

Review of the retention options contained in the IDS and GBA reports identifies that, while the impact of the retention of Hotham House upon the current proposed redevelopment design of the Hospital has been well analysed and expressed, neither report has considered in any depth how the design of the hospital could be altered, reduced or rearranged to accommodate and reuse Hotham House within the new hospital.

#### 6.1.4 Retention Opportunities

Review of the opportunities for retention of the existing structure of Hotham House identifies that it has the potential to be altered and adapted whilst retaining its significance. It is possible, given appropriate design solutions, that the former residence could be integrated into an alternate hospital design. Uses might include community, allied health, hospital volunteer, outpatient social support, specialist study centre, childcare, offices, café or other such uses as can be reasonably accommodated within the structure.

### 6.2 Conclusions

The conclusions arising from this review include that the identification of Hotham House as a Local Heritage Item is soundly based and that retention and adaptation of the building are possible. Notwithstanding these conclusions, Macquarie Health clearly have a preferred redevelopment scheme for the hospital that does not include retention and reuse of Hotham House. This is not to suggest that

Macquarie Health have not considered this option but, for reasons other than heritage, it is not an option that they wish to adopt and implement.

Local Heritage listing does not preclude the demolition of the building, if the opinion of the consent authority is that the health benefits provided by the hospital outweigh the value of the retention of this locally listed heritage building.

It is up to the approval authorities to make a determination as to the merits of Macquarie Health's preferred hospital scheme.

### 6.3 Recommendations

The following recommendations should be considered.

1. If Hotham House is to be retained, the proponent should engage an experienced heritage architect to assist in identifying how Hotham House can be adapted to meet the Hospital's requirements.
2. If Hotham House is not retained, a photographic archival record should be prepared and lodged with the Local History section of the Local Library (or another suitable repository).
3. Consideration should be given to the implementation of an interpretation strategy, to record and memorialise the history of the site, in the absence of the building itself.
4. Both of the above heritage management processes should be in accordance with best practice as established by the Australia ICOMOS Burra Charter and the relevant NSW Heritage Guidelines for adaptive reuse, archival recording and/or interpretation.

