

# Heritage Gap Analysis



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# 1. Introduction

## 1.1 Heritage Conservation in the Woollahra LGA

The Woollahra local government area (LGA) has a rich and diverse history that is represented in Victorian, Federation, Inter-War and post-1950 buildings, precincts and streetscapes. This environmental heritage has local, state and in some instances a nationally recognised level of heritage significance.

Environmental heritage under the *NSW Heritage Act, 1977* 'means those places, buildings, works, relics, moveable objects, and precincts, of State or local heritage significance'.

According to the *Woollahra Local Environmental Plan 2014* (Woollahra LEP 2014), heritage significance 'means historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value'.

Schedule 5 Environmental Heritage (Schedule 5) of the Woollahra LEP 2014 represents Woollahra's statutory list of environmental heritage, being heritage items, heritage conservation areas (HCAs) and archaeological items. All items in Schedule 5 have been listed based on the recommendations of a heritage study or a site-specific heritage assessment consistent with the NSW heritage guidelines. Heritage items and places are shown on the heritage maps that accompany the Woollahra LEP 2014.

Schedule 5 is the result of over 40 years of strategic planning work undertaken collaboratively by Council staff, heritage specialists, Councillors, volunteers and other interested parties to research, identify and protect Woollahra's heritage.

The three main heritage conservation areas of Paddington, Woollahra and Watsons Bay are the result of years of proactive and collaborative work undertaken by local not-for-profit organisations such as the Paddington Society, the Woollahra History & Heritage, but also state-wide conservation organisations such as the National Trust of Australia (NSW).

One of the key results of this collaboration and proactive work are the heritage chapters of the *Woollahra Development Control Plan 2015* (Woollahra DCP 2015) that are now among the most detailed and informative guidelines offered to heritage conservation areas in the state of NSW.

There are over 700 heritage items identified in Schedule 5 of the Woollahra LEP 2014, 15 heritage conservation areas and 6 archaeological items. Accordingly, almost 50% of the Woollahra LGA area is offered some sort of statutory heritage protection.

## 1.2 Heritage Gap Analysis

A Heritage Gap analysis seeks to identify gaps in Schedule 5 and identify opportunities for improvement in Council's planning instruments and heritage management policies. It also aims to advise on best practice heritage management within the NSW legislative framework on a proactive rather than reactive approach to heritage conservation.

This report was initiated in response to a Council's Notice of Motion dated 9 December 2019:

*THAT Council immediately undertakes a Heritage GAP analysis to:*



- *Review and analyse existing heritage items and architectural typologies to identify gaps in Schedule 5 of our Woollahra Heritage LEP;*
- *Develop a strategy for new heritage listings;*
- *Identify priorities and items or areas at risk; and*
- *Develop an action plan to address the gaps.*

The Gap Analysis and Action Plan will inform future heritage studies that will fill the gaps identified in the current listings and management practices. Implementation of the Action Plan will continue to position Woollahra Council as a leader in heritage management at local government level.

### 1.3 Woollahra's Planning Controls

The Woollahra Local Environmental Plan 2014 (Woollahra LEP 2014) is a legal document which regulates land use and development in the Woollahra LGA and has been prepared under the EP&A Act.

Among the objectives of Clause 5.10 of the Woollahra LEP 2014 are:

- (a) to conserve the environmental heritage of Woollahra,*
- (b) to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,*
- (c) to conserve archaeological sites, and*
- (d) to conserve Aboriginal objects and Aboriginal places of heritage significance.*

The protection of Woollahra's heritage conservation areas is afforded by Clause 5.10 Heritage Conservation of the Woollahra LEP 2014 and the guidelines offered by the *Woollahra Development Control Plan 2015* (the Woollahra DCP 2015).

The Woollahra DCP 2015 strives to achieve best heritage practice and is constantly updated and reviewed by Council.



*Figure 1: View of Watsons Bay and Green (Laing) Point (Source: Photoshelter)*

## 2. How did we get here?

This section of the report investigates the evolution of Schedule 5 through a series of heritage studies and assessments undertaken since 1984, the year the first Woollahra Heritage Study was undertaken.

### 2.1 Statutory Heritage Listing

The process of heritage listing today is based on the level of significance of an item and the type of legislation under which it is proposed to list it. The Heritage Council of NSW recognizes four levels of significance for heritage in NSW. Levels of significance indicate the context in which a heritage place is important – within the local area, state-wide, Australia-wide or worldwide. ‘Local’, ‘state’, ‘national’ and ‘world’ significance is not about ranking, it’s about context.<sup>1</sup>

The local and state level of an item is determined by using the Heritage Council criteria to assess its significance, as set out in the 2001 Heritage Office guideline *Assessing Heritage Significance*.

Level of Significance	Legislation	Heritage Register
<b>Local</b>	<i>Local Environmental Plan</i>	Schedule 5
<u>Threshold</u>	An item needs to satisfy one of seven NSW heritage criteria to meet the threshold at local level.	
<b>State</b>	<i>Heritage Act, 1977 (NSW)</i>	State Heritage Register
<u>Threshold</u>	An item needs to satisfy one of seven NSW heritage criteria to meet the threshold at State level.	
<b>National</b>	<i>Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth)</i>	National Heritage List
<u>Threshold</u>	Outstanding heritage value to the Nation by meeting one or more of the National heritage significance criteria.	
<b>World</b>	<i>Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth)</i>	World Heritage List
<u>Threshold</u>	Outstanding universal value by meeting at least one of ten selection criteria.	

Table 1: levels of heritage significance associated with relevant legislation and heritage registers

The majority of heritage items in NSW are local heritage items, which are managed by local governments through environmental planning instruments such as the Woollahra LEP 2014.

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<sup>1</sup> Heritage Council of NSW, *Levels of heritage significance* guideline, 2008, available at <https://www.heritage.nsw.gov.au/assets/Uploads/a-z-publications/j-l/levels-of-heritage-significance-2008.pdf>, viewed November 2020.

A small number of items are of State heritage significance, followed by a small number of National heritage items and World heritage items. A heritage place may have one or more levels of significance.

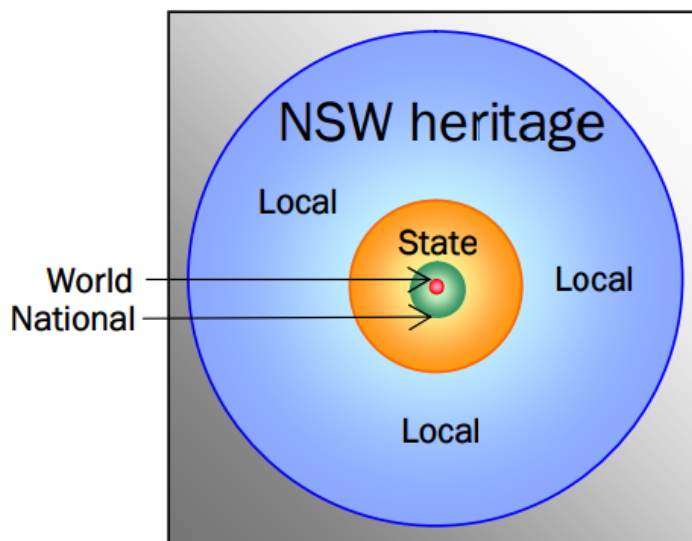


Figure 2: Diagram explaining levels of significance in Australia

### 2.1.1 Aboriginal Heritage

Aboriginal heritage supplements the categorisation at 2.1 by listing Aboriginal objects and Declared Aboriginal Places protected under the *National Parks & Wildlife Act 1974* (NP&W Act 1974).<sup>2</sup> Aboriginal heritage can be of local, State, National and World level of significance and is managed concurrently with additional legislation as per Table 1.

The NPW Act has, among its objects, the 'conservation of places, objects and features of significance to Aboriginal people'.

Aboriginal cultural heritage consists of 'places, traditions, beliefs, customs, values and objects that represent the living history of past Aboriginal generations and are of important cultural and heritage significance to Aboriginal people'.<sup>3</sup>

The relevant register for Aboriginal heritage is the Aboriginal Heritage Management System (AHIMS), which is managed by Heritage NSW. Differing from usual heritage conservation practices, everyone is obliged to record a site with AHIMS when it is discovered, and there is no need to go through a nomination or a planning proposal process.

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<sup>2</sup> Aboriginal Objects mean Aboriginal campsites in rockshelters and in the open, painted and engraved art, places of burial and also artefacts of stone, bone or shell that were used by Aboriginal people in the past. Declared Aboriginal Places are places of special significance for Aboriginal culture in New South Wales that have been gazetted under the NP&W Act.

<sup>3</sup> Heritage NSW, Aboriginal Cultural Heritage definition, available at <https://www.heritage.nsw.gov.au/about-our-heritage/aboriginal-cultural-heritage> .



## 2.2 Key Woollahra Heritage Studies

The earliest 'heritage studies' in the Woollahra LGA were the Paddington field surveys carried out by volunteer residents, historians and architects led by the Paddington Society in 1969 and the National Trust in 1982. Many of the National Trust classification cards produced inventory sheets with photographic surveys which can now be found at the Woollahra Libraries Local History Centre.

In October 1980 Council resolved to submit a grant application to the Heritage Council of NSW under the *National Estate Program 1980/1981*.<sup>4</sup> The resolution aimed to obtain a grant to undertake a study of housing in the already existing conservation zones of Paddington and West Woollahra, convert typed listings into a comprehensive computerised property data base system and undertake a study of the tourist utilisation of the principal historical buildings and places in the Municipality.



Figure 3: detail of a heritage item in Watsons Bay (Source: Photoshelter)

The following table lists the major heritage studies occurred since 1984.

Heritage Studies	Notes
<b>Woollahra Heritage Study (1984)</b>	<p>This was the first heritage study undertaken by heritage consultants in Woollahra. It encompassed the whole of the Municipality and the consultant team were led by Hughes Truman Ludlow.</p> <p>The study produced 800-900 indicative sites for listing. Of the 347 nominated items, 264 were endorsed for listing. Of note is that not only buildings but also streetscapes and open spaces were included.<sup>5</sup></p>

<sup>4</sup> Council Minutes, 27 October 1980 (597.G) (9) a to c, page 1093

<sup>5</sup> Urban Planning Committee, 20 December 1999 (R1)

Heritage Studies	Notes
<b>Register of Significant Trees (1991)</b>	<p>The 1991 Register of Significant Trees (RST) undertaken by LandArc consultants is a Council-wide comprehensive review of trees identified for their historic, botanic and visual dominance.<sup>6</sup></p> <p>For the most part, the trees within the RST are reflected in the list of Environmental Heritage Items of the Woollahra LEP 2014. There has been no new nomination or addition to the register since the development of the original RST document in 1991.</p>
<b>Preliminary Heritage Investigations for the Residential 2(B) Areas of Bellevue Hill, Darling Point and Rose Bay (1997-98, Tanner Study)</b>	<p>In 1997, Council engaged a team of heritage consultants led by Tanner and Associates in collaboration with Hassell to undertake a heritage study aiming to identify items or areas of environmental heritage in areas zoned 2(B) in Bellevue Hill, Darling Point and Rose Bay localities.</p> <p>The study provided a preliminary descriptive survey of buildings and landscape elements on a preliminary inventory sheets, with a “star” ranking for ‘definite’ (potential heritage items), ‘possible’ heritage significance (to be reviewed over time by council’s heritage officer) and ‘inspection required’ sites prior to assessment of heritage significance.</p> <p>While nominating approximately 200 items, only 50 items were subsequently listed and added to the Schedule 3 of the Woollahra LEP 1995.<sup>7</sup> The major legacy of this project was the creation of a list of preliminary assessments to be reviewed during the assessment of development applications by Council’s Heritage Officers.</p>
<b>Thematic Histories (2002)</b>	<p>The objectives of this heritage study was to supplement the preliminary thematic histories contained in the initial 1984 study and progress through the following phases:</p> <ul style="list-style-type: none"> <li>▪ Phase 1: Prepare thematic histories for Woollahra/West Woollahra, Bellevue Hill, Darling Point, Double Bay, Rose Bay and Vaucluse.</li> <li>▪ Phase 2: Identify potential heritage items</li> <li>▪ Phase 3: Mapping of historic settlement on Council’s land information system</li> </ul> <p>Following Council’s endorsement of Phase 1 (thematic histories), phase 2 and phase 3 ‘have never been implemented.</p> <p>The major legacy of this work was the delivery of detailed and comprehensive histories of Woollahra’s suburbs that are still today some of the most useful historic references for the area.</p>
<b>Contemporary Buildings Study (2006)</b>	<p>The Contemporary Heritage Items Project was undertaken by Clive Lucas, Stapleton &amp; Partners a proactive step to address the imbalance in the representation of significant examples of modern and contemporary</p>

<sup>6</sup> Urban Planning Committee, 20 December 1999 (R1)

<sup>7</sup> Urban Planning Committee, 20 October 2003

Heritage Studies	Notes
	<p>Australian architecture in Woollahra LEP 1995 Schedule 3 - heritage items.<sup>8</sup></p> <p>The study recommended the heritage listing of 18 nominated items, with only 10 items receiving Council endorsement.<sup>9</sup></p>
<p><b>Woollahra Aboriginal heritage study (2021)</b></p>	<p>Undertaken by Coast History &amp; Heritage, the main objectives of this study were to research Aboriginal cultural heritage and provide Council with a strategy for managing registered sites and areas with Aboriginal cultural heritage sensitivity.</p>

Table 2: Key heritage studies undertaken between 1984 and 2006



Figure 4: Cover of Thematic Histories (Source: Woollahra Council)

<sup>8</sup> Urban Planning Committee, 30 January 1996

<sup>9</sup> Urban Planning Committee, 13 November 2006, 27 November 2006, 18 December 2006



## 2.3 Other Heritage Studies

In addition to the key heritage studies listed in 2.2, other heritage studies have been developed through the years.

Between 1996 and 2003, 11 heritage studies were funded by Council to identify HCAs and provide them with specific provisions in the Woollahra DCP 2015.

Development threats and orders under the Heritage Act 1977 prompted site specific heritage assessments and amendments of the Woollahra LEP 1995 or site-specific controls in the Woollahra DCP.

Other heritage studies affecting the Woollahra area have also been prepared by public authorities, other local government authorities or not-for-profit organisations in conjunction with or independently from Woollahra Council. These are:

- 1983 Bondi Junction, Watsons Bay and West Woollahra Conservation Study (Perimal, Wrathall & Murphy)
- 1987 Bondi Junction Heritage Study (Annette Green)
- 1988 Signs Underfoot Heritage Study (Woollahra History & Heritage Society)
- 1991 Sydney Harbour Foreshore Heritage Study (Godden Mackay)



Figure 5: view of Cliff Street in Watsons Bay (Source: Photoshelter)

## 3. Where are we currently?

### 3.1 Current Heritage Studies

At the time of writing this report, the following heritage studies are being progressed and are yet to be finalised.

Heritage Study	Summary
<b>Places of Worship Heritage Study</b>	A study of Woollahra's places of worship is being undertaken as a result of a Council NOM dated 8 April 2019. The study includes and assessment of significance of nine places of worship that are not heritage listed.
<b>Rose Bay Public School Old School Hall and McAuley Catholic School and Outbuildings Heritage Assessments.</b>	<p>A heritage study on the Rose Bay Public School Old School Hall and McAuley Catholic School and Outbuildings (formerly Christian Brothers College Rose Bay) is currently being undertaken by Council staff as a result of a Council NOM dated 8 April 2019.</p> <p>The study will investigate the potential heritage significance of these educational buildings in order to identify items of heritage significance.</p>
<b>Leslie Wilkinson Heritage Study</b>	<p>The Woollahra Municipality has the largest collection of residential buildings designed by Leslie Wilkinson in Australia. This project initially started in 2008, with a progress report being presented to the EPC on 10 November 2014. On 24 November 2014, Council resolved:</p> <p><i>That Council defer the Study until Council Staff have the capacity to priorities the Study.</i></p>
<b>Inter-War Residential Flat Buildings study, Bungalows study and Arts and Crafts heritage study.</b>	<p>A methodology for undertaking the study was endorsed by Council on 12 March 2012. A progress report was provided to the Urban Planning Committee (UPC) on 12 June 2012. In August 2014, this project was divided into different studies for the following three building typologies:</p> <ul style="list-style-type: none"> <li>• Inter-War Bungalows (comprising but not limited to Californian Bungalows);</li> <li>• Arts and Crafts Buildings (comprising both Inter-War and Federation Bungalows)</li> <li>• Inter-War Residential Flat Buildings.</li> </ul> <p>A report on <b>Inter-War Bungalows</b> was submitted to UPC on 22 June 2015, with inventory sheets for each property. On 22 June 2015 Council resolved:</p> <p><i>THAT Council takes no further action in relation to the listing of Inter-war Bungalows as local heritage items.</i></p> <p>In November 2019, a new NOM effectively restarted this heritage study, which was presented to the EPC and Council in September 2021.</p> <p>It is understood that the fieldwork and analysis of the <b>Inter-War Residential Flat Buildings heritage study</b> has been finalised, with a considerable number of residential flat buildings proposed to proceed with heritage listing either individually or as part of heritage conservation areas.</p>



Heritage Study	Summary
	Heritage inventory sheets however still need to be prepared. This heritage study has not been presented to the Environmental Planning Committee (EPC).
	The <b>Arts and Crafts heritage study</b> remains at a preliminary stage, with a working list of properties for investigation still to be finalised.
<b>Significant Architects heritage study</b>	This heritage study is yet to be completed and will try and capture built and landscape heritage designed by prominent architects.

Table 3: heritage studies currently underway

## 3.2 Council Resolutions yet to be progressed

The following Council resolutions have not yet been progressed by Council staff.

- Bay and Knox Street heritage assessments (Council Resolution 26 April 2021)
- Heritage Assessment of 543-549 Glenmore Road Edgecliff (Council Resolution 15 June 2021)
- 58 – 88-90 Oxford Street Woollahra (Council Resolution 23 August 2021)

These are anticipated to be progressed in 2022.

## 3.3 Draft DCP Amendments

The Woollahra DCP is a key instrument to manage our heritage conservation areas, it therefore needs to be maintained at a high level standard and up-to-date with up-to-date heritage practice.

Whilst a number of DCP amendments have recently been finalised for Paddington HCA and the Neighbourhood HCAs (Chapter C1 and B2 respectively), there has been no recent update to the Woollahra and Watsons Bay HCAs (Chapter C2 and C3 respectively). It is also anticipated that the controls applying to the Double Bay Centre will require amendments based on other strategic planning projects.

In the Woollahra DCP 2015, there is no dedicated chapter to heritage items. It is considered that this could be addressed as a future DCP amendment.

## 3.4 Management of heritage items

Development applications involving heritage items are lodged with Council on a regular basis. Heritage inventory sheets play a key role in providing preliminary heritage advice to Applicants and architects to ensure the heritage significance of properties is considered at design stage. However, some of our heritage inventory sheets have not been completed or are out of date.

The lack of information in certain cases provides uncertainty for owners and perspective buyers during properties sales, which results in numerous contacts with Council's heritage officers to 'know more'.

Staff has been updating heritage inventory sheets on the Office of Environment & Heritage website on an *ad hoc* basis, but there is still a large number of inventory sheets that have no data (classified as blank in the below pie chart) or unsatisfactory information in key parts such as the heritage criteria and a statement of significance (identified as “generic” in the pie chart below).

The following graphic illustrates progress of review of the heritage inventory sheets for existing heritage items.

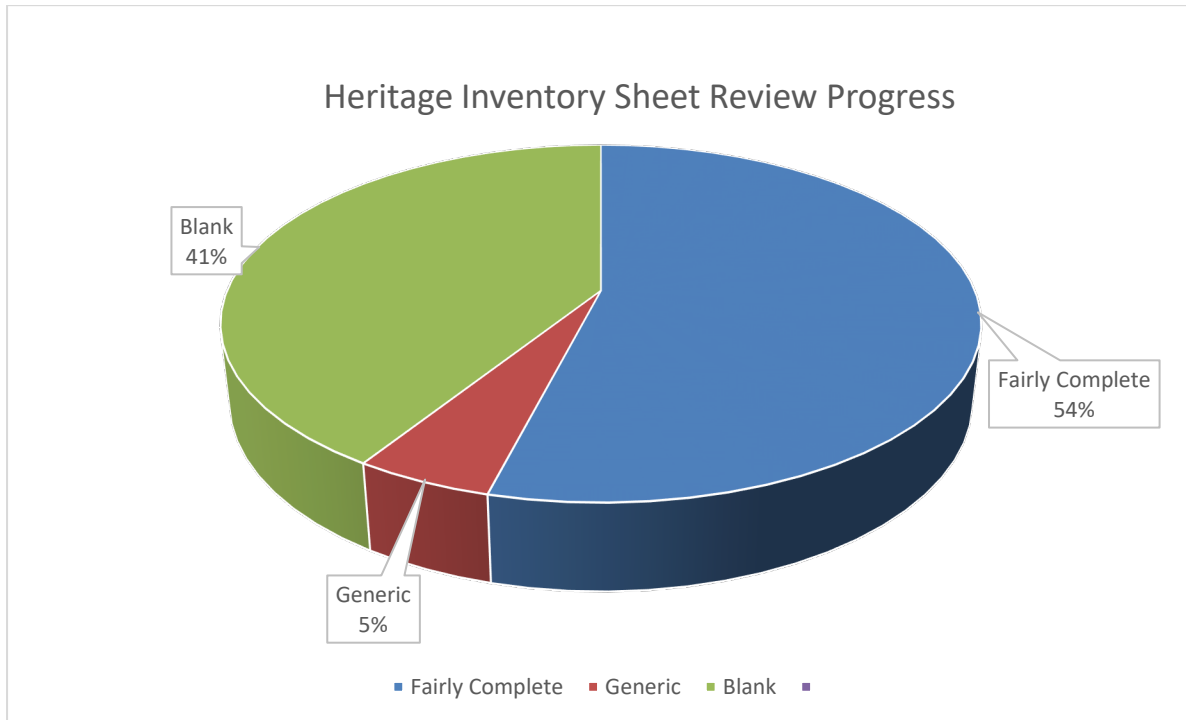


Figure 6: Heritage Inventory Sheet Review Progress as at September 2021

## 4. What is listed in the Woollahra LEP 2014?

### 4.1 Introduction

At the time of preparing this study there are over 700 heritage items, 15 heritage conservation areas and 6 archaeological items listed in Schedule 5 of the Woollahra LEP 2014.

This section of the Gap Analysis analyses the existing composition of Schedule 5 of the Woollahra LEP 2014 based on:

- Composition of environmental heritage
- Eras of development
- Architectural styles
- Architects representation
- Levels of significance

The historical development of Woollahra and the analysis of existing heritage items allow for the identification of potential gaps that could be addressed in future heritage studies. The strategy to fill those gaps is identified in Section 6 and 7 of this report.

### 4.2 Approach and Limitations

Each item listed in Schedule 5 is to be supplemented by a heritage inventory sheet with detailed information on a site's significance available from the state heritage inventory (SHI), which is managed by Heritage NSW based on information provided by each NSW local Council.

Some of the information contained in section 4 of the Gap Analysis derives from data available in the SHI – therefore the quality and completeness of the SHI data has a direct influence on the quality of the data here presented.

Where needed, information has been collated from heritage reports in support of development applications, listing cards from non-statutory heritage registers (the Australian Institute of Architects, the National Trust of Australia (NSW), the Register of the National Estate) or from information available in the Local Studies section of the Woollahra Library.

Information with regards to architects active in the LGA heavily relies on the online Building Index that has been recently digitised and is in the process of being uploaded on the Woollahra Libraries website. This is a key resource for this analysis, but is still a work in progress, hence the need to outline some limitations, especially in the analysis of architects.

In addition to the above, it is noted that heritage listed trees in Schedule 5 have been grouped under “Landscape – Natural”, to showcase the large numbers of heritage trees in Woollahra.

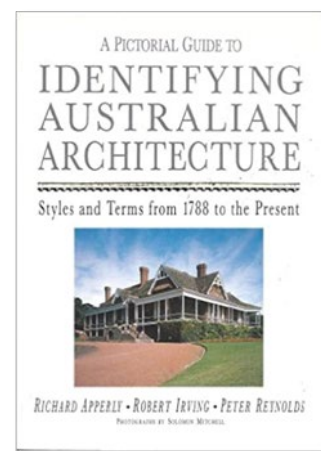
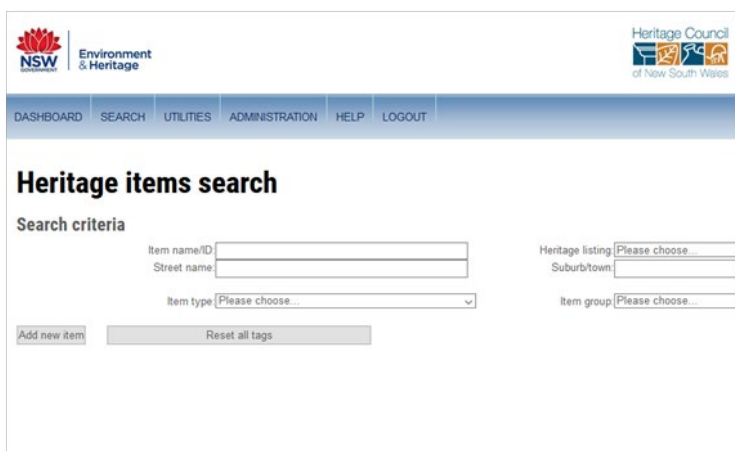
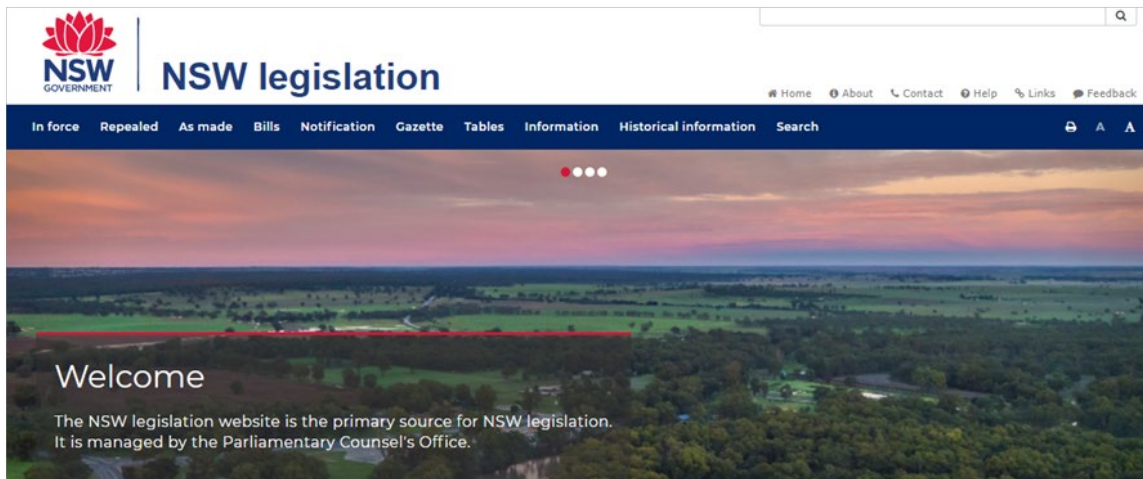


Figure 7: Main sources for this report

### 4.3 Composition of Woollahra’s Environmental Heritage

Heritage NSW categorises environmental heritage items by types, groups and categories, identifying 7 item types, 39 item groups and over 300 categories of items applicable to each heritage item.

Only item types and item groups have been reviewed as part of the Heritage Gap Analysis, however some item groups have been slightly modified to better suit Woollahra. For example, item type ‘residential building (private)’ has been subdivided into House and Residential Flat buildings, given the large number of listed flat buildings available in Woollahra.

Buildings change uses over time. Information on typologies and groups of heritage items in the report heavily relies on the original use of a building, where known. For example, the heritage listed Watsons Bay Scout Hall was the former Watsons Bay Public School and, for the purpose of this report, it is considered an educational building, not a community facility. Similarly, Fairfax House in the Scots College precinct is identified as a house, not an educational building.

### 4.3.1 Item Types

The majority of listed items in Schedule 5 are built items (567), followed by landscape items (134). The smallest number of types is moveable and archaeological – maritime with only 2 types, which is surprising for a Municipality stretching along Sydney Harbour.

Schedule 5 is structured in three parts (A, B and C), while Heritage NSW includes 7 item types. See table 4 for correlation between the distribution of item types in Parts A, B and C of Schedule 5 and Heritage NSW types.

From a review of existing items in Schedule 5, it is noted that some archaeological items are included in Part A Heritage Items instead of Part C Archaeological items. For example, “Remains of Vaucluse Point ferry wharf” (Item 357) is not included in Part C Archaeological items but only in Part A Heritage Items. Any future review of Schedule 5 should address this inconsistency.

Schedule 5	Item Types	In Schedule 5
Heritage Items (Part A)	Built	567
	Landscape	134
	Complex/Group	13
	Moveable	2
	Archaeological	10 - Terrestrial (8) - Maritime (2)
<b>Sub-total</b>		<b>726</b>
Heritage Conservation Areas (Part B)	Area	15
<b>Sub-total</b>		<b>15</b>
Archaeological Items (Part C)	Archaeological – Terrestrial	6
	Archaeological - Maritime	0
Sub-total		<b>6</b>
<b>Total</b>		<b>747</b>

Table 4: Types of listed environmental heritage in Schedule 5

See Figure 8 showing item types in Schedule 5.



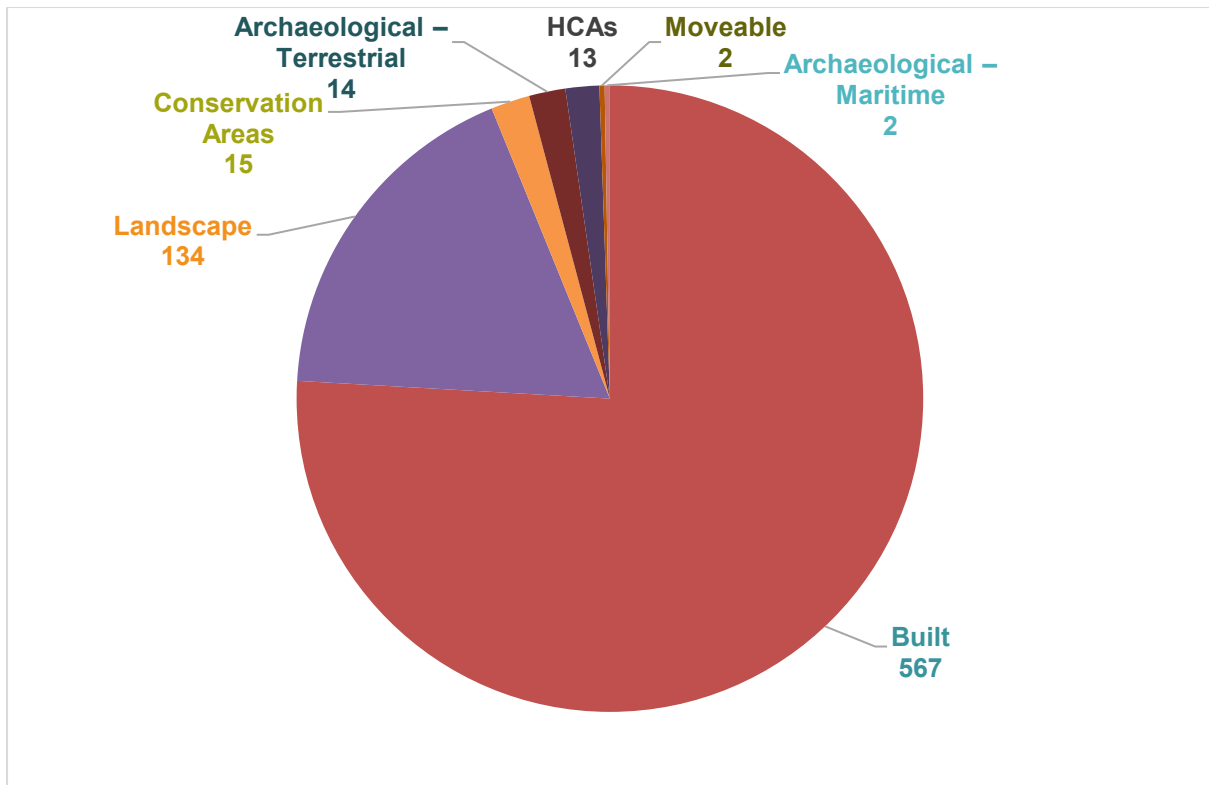


Figure 8: Composition of Schedule 5 of the Woollahra LEP 2014

### 4.3.2 Item Groups

Item groups are subcategories of item types, organised according to the use of a site.

Private residential buildings form the majority of item groups represented in Schedule 5 of the Woollahra LEP 2014, with 421 private homes and 54 listed residential flat buildings.

These numbers are followed by landscape items (both natural and cultural, 82 and 45 respectively) followed by religious buildings (20) and transport – land (15) items, the latter mostly being bus stops.

Surprisingly, there are only 10 item groups related to **transport – water** in the Woollahra LEP 2014.

The number of **commercial** buildings is also surprisingly low (5), given the various commercial centres in Woollahra and the southern boundary following the Oxford Street alignment.



Figure 9: Item groups of environmental heritage in Schedule 5. The star indicates that Residential Building (private) has been purposely separated from House and Flat building to reflect more clearly Woollahra's groups.

If we compare the data in Figure 9 above with the general list of groups available on the Heritage NSW website (copied in Table 5 below), some additional anomalies are evident.

There are no **Aboriginal** groups listed in Schedule 5, however that is due to the deliberate choice to avoid duplication of sites already listed on the statutory AHIMS register.

There are also no **Maritime industry** groups, which is unusual given Watsons Bay's fisherman's village character, however this may be a consequence of previous demolitions.

There are very few **Community facilities** (3), which includes clubs, community halls, Masonic halls and Schools of Arts.

Missing are also **Manufacturing and Processing** facilities. While this could be due to the particular history of this LGA, which has always had a residential character, there are pockets of former industries in Paddington that could be further explored to seek representation of its industrial history in Schedule 5.

General list of Item Groups from the SHI	
<b>Aboriginal</b>	<b>Parks and Gardens</b>
Cemeteries and Burial Sites	Postal and Telecommunications
Collections	<b>Recreation and Entertainment</b>
<b>Community Facilities</b>	Religion
Education	Residential Buildings (private)
Exploration, Survey and Events	Retail and wholesale
Farming and Grazing	Scientific Facilities
Finance	Hotels and pubs <sup>10</sup>
Forestry and Timber Industry	Transport - Air
Government and Administration	Transport - Rail
Health Services	Transport - Road
Landscape - Cultural	<b>Transport - Water</b>
Landscape - Natural	Urban Area
Law Enforcement	Utilities - Drainage
<b>Manufacturing and Processing</b>	Utilities - Electricity
<b>Maritime Industry</b>	Utilities - Gas
Military	Utilities - Sewerage
Mining and Mineral Processing	Utilities - Waste
Monuments and Memorials	Utilities - Water

Table 5: general list of item groups from the State Heritage Inventory. In Bold are the groups with few or no representation in Schedule 5.

Few **Parks and gardens** are individually listed. However, many of them appear shaded on the heritage map due to the presence of a specific listed item such as a tree or sandstone wall or an archaeological feature (see Rushcutters Bay Park, Nielsen Park, McKell Park, Green Point Reserve and Gap Park for example).

It would therefore be more appropriate to say that singular culturally significant items elements of parks are listed on the Woollahra LEP. This approach derives from the philosophy and timing of the 1980-1990s heritage studies, when individual components or items were listed, in spite of their context and relationship to their settings.

For example, Green Reserve in Laings Point, Watsons Bay (also referred to as “Green Point”), is not specifically identified in Schedule 5. However, “Green (Laings) Point Battery” (Item 439) and “Green Point Obelisk” (Item 440) are listed, with the reserve shaded as a heritage item on the relevant heritage map.

This presents some issues in managing these items’ settings and curtilage and dismisses other significant components of this park, such as ground and maritime archaeology

<sup>10</sup> Heritage NSW defines Hotels and Pubs ‘transient accommodation’, but it has been here defined as ‘hotels and pubs’ for clarity.

(remains of military structures above and underwater), views and vistas enjoyed from the reserve, and the significant natural and cultural landscape it forms part (Camp Cove).

This itemised approach to heritage listing has consequences and implications to the management of the land. Furthermore the missing information in the associated heritage inventory sheets do not assist us in understanding the significance of the site.

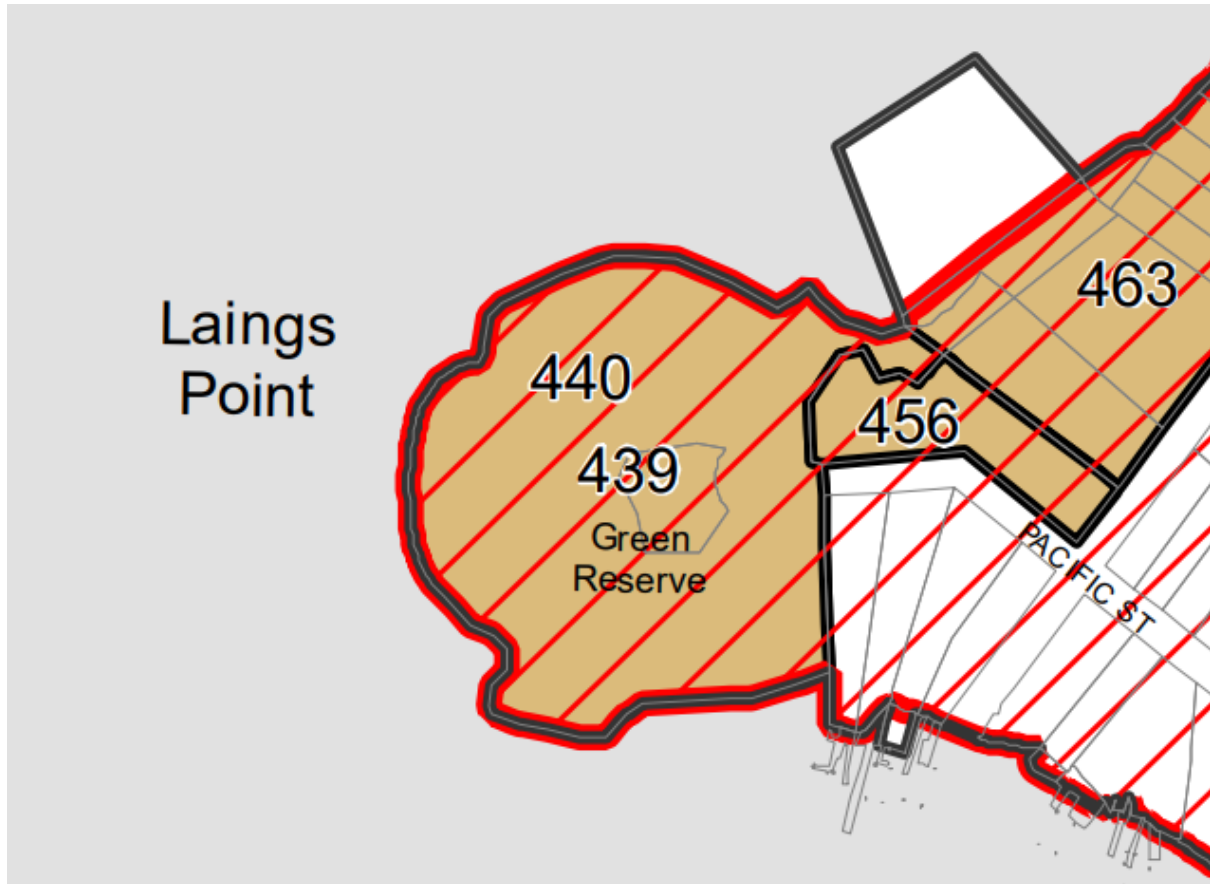


Figure 10: Sheet HER\_004 of the Woollahra LEP 2014 Heritage Map

Since the 1980s, this approach has since evolved in the heritage industry, with the adoption of new guidelines on Cultural Landscapes that put more emphasis on the relationship between the natural environment and culturally significant items and their settings (see Figure 11). It is therefore under this perspective that most of our urban parks and bushland reserves should be re-assessed to verify whether their cultural landscape would meet the threshold for heritage listing.

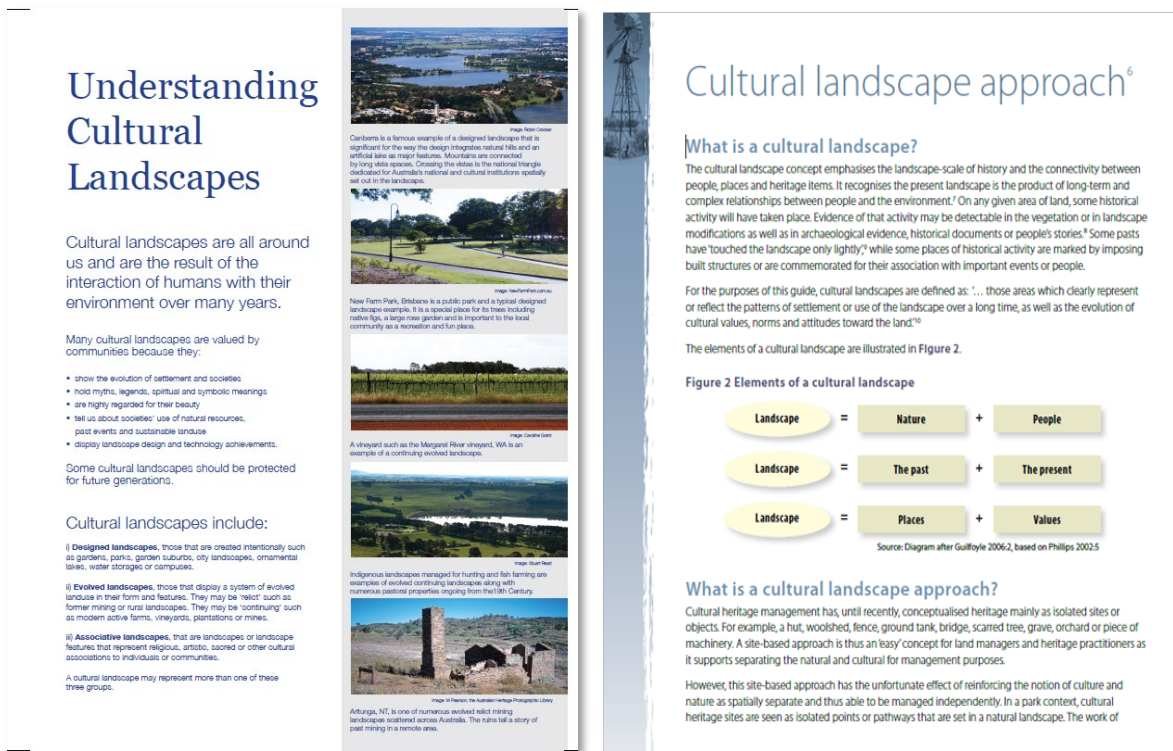


Figure 11: 2010 Australia ICOMOS, Understanding Cultural Landscapes Flyer and 2010 Environment, Climate Change & Water, Cultural Landscapes, p.4

## 4.4 Eras of development

Australian history can be summarised in the following periods:

- |                 |                               |
|-----------------|-------------------------------|
| • Before 1788   | Pre-colonisation              |
| • 1788 – c1840  | Old Colonial Period           |
| • c1840 – c1890 | Victorian Period              |
| • c1890 – c1915 | Federation Period             |
| • c1915 – c1940 | Inter-War Period              |
| • c1940 – 1960  | Post-War Period               |
| • 1960 -        | Late Twentieth Century Period |

Focusing on the Post-Colonial historical phases, and focusing on built heritage items, the Victorian and Federation periods are the most represented eras in Schedule 5 (176 and 174 respectively), followed by the Inter-War period (128) as shown in Figure 12 below.

Most heritage dating from the Old Colonial Period has already been demolished, hence the low number of items dating from this phase of development (6).

Fewer numbers are noted for Late Twentieth Century Period buildings (11) and Post-War Period buildings (3), possibly due to the lack of heritage studies addressing this particular phase of development.



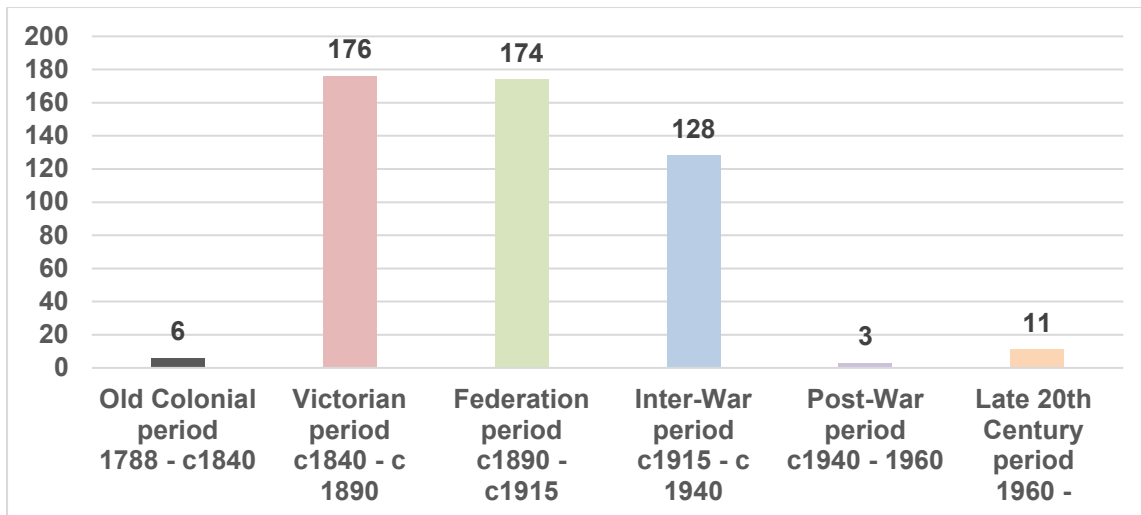


Figure 12: Eras of development of listed items in Schedule 5 organised chronologically (pre-Colonisation phase excluded)

## 4.5 Architectural Styles

Each era of development includes its own styles that can be used to classify Australian architecture. Reference to architectural styles in this report is mostly based on the publication Apperley, Irving and Reynolds, *Identifying Australian Architecture*, 1989, Angus & Robertson, with some exceptions and adaptations to the local area.

See Figure 13 for a classification of architectural styles of Woollahra's built heritage.

The majority of built heritage items present in Schedule 5 are **Federation Queen Anne** style (72), followed by **Victorian Filigree** (45), **Federation Arts & Crafts** (44), and **Inter-War Mediterranean** (38).

Interestingly, other types of Inter-War styles are poorly represented, such as **Inter-War Gothic** (4) and **Inter-War Old English** (5) and **Inter-War Free Classical** (6). This is interesting, given the Inter-War character of Woollahra's streetscapes and the large numbers of development applications being lodged for full demolition of buildings from the Inter-War period.

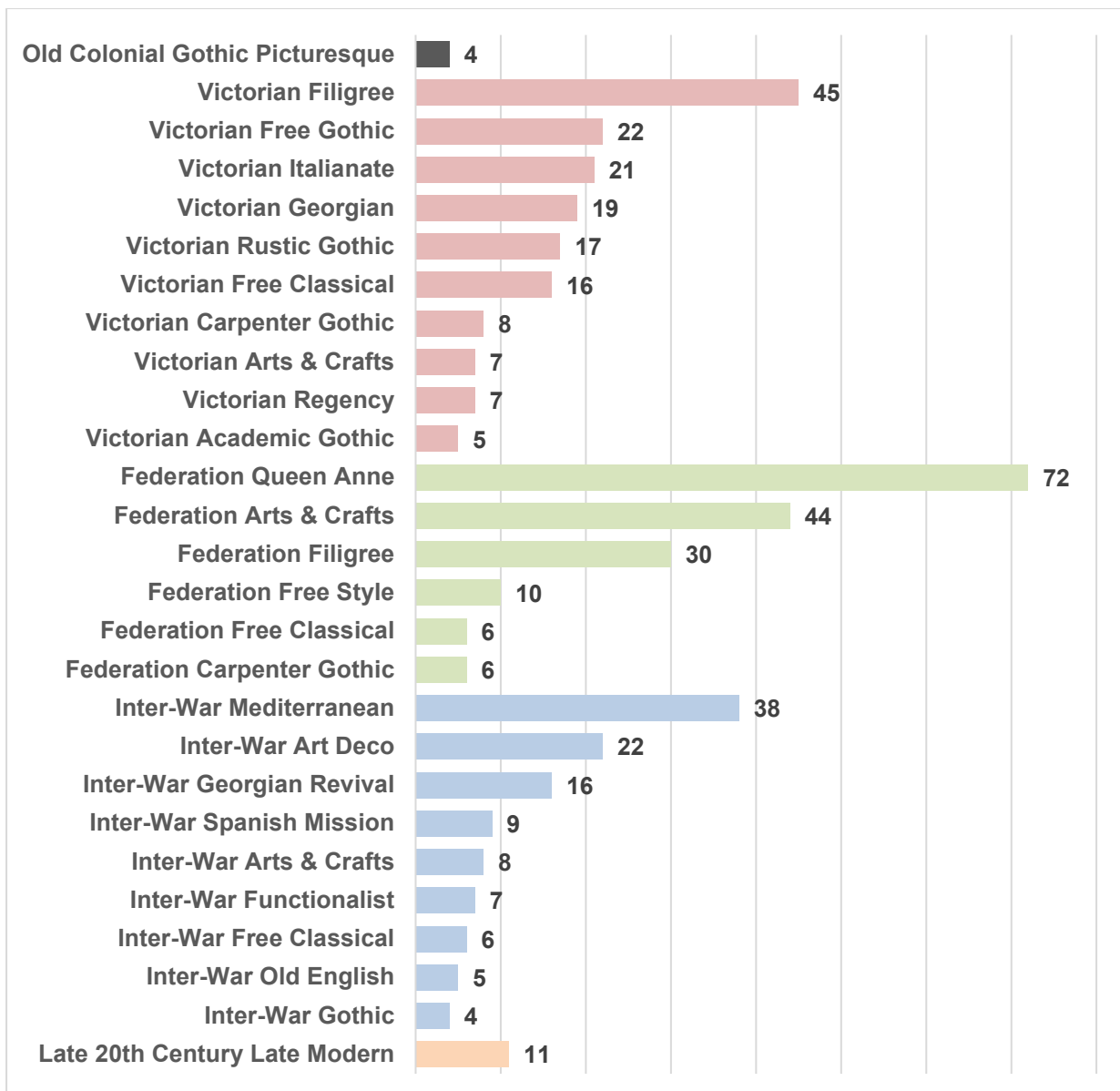


Figure 13: Styles of built items reviewed in Schedule 5. Styles with 3 or less items are not shown in this graphic.

Few numbers are also noted for the **Late 20<sup>th</sup> Century Late Modern (11)**, which is consistent with the similar drop in numbers for Post-War and Late 20<sup>th</sup> Century period eras of development mentioned at 4.5. Given the large extent of architects designed buildings and award winning buildings, this gap is considered significant.

## 4.6 Architects

The most represented architects in Schedule 5 are **Leslie Wilkinson** and **Joseland & Gilling**, with respectively 19 and 11 items. Both L. Wilkinson and Joseland & Gilling were mostly active in the Inter-War period, not the most represented Victorian or Federation period.

Other represented architects are **Edmund Blackett (9)**, **Halligan & Wilton (7)** and **Manson & Pickering (6)**, respectively from the Victorian and Federation period.

Only Leslie Wilkinson and Edmund Blackett have buildings assessed of being of State significance (two and one respectively), while all other buildings are listed as items of local significance.

With the exception of **Ancher, Mortlock & Woolley**, architects from the Post-War and Late 20<sup>th</sup> Century Late Modern eras of development of Woollahra appear to be under-represented (Neville Gruzman, Prevost & Ancher, Samuel Lipson), as evident also from the analysis at 4.5 and 4.6 (see Figure 14).

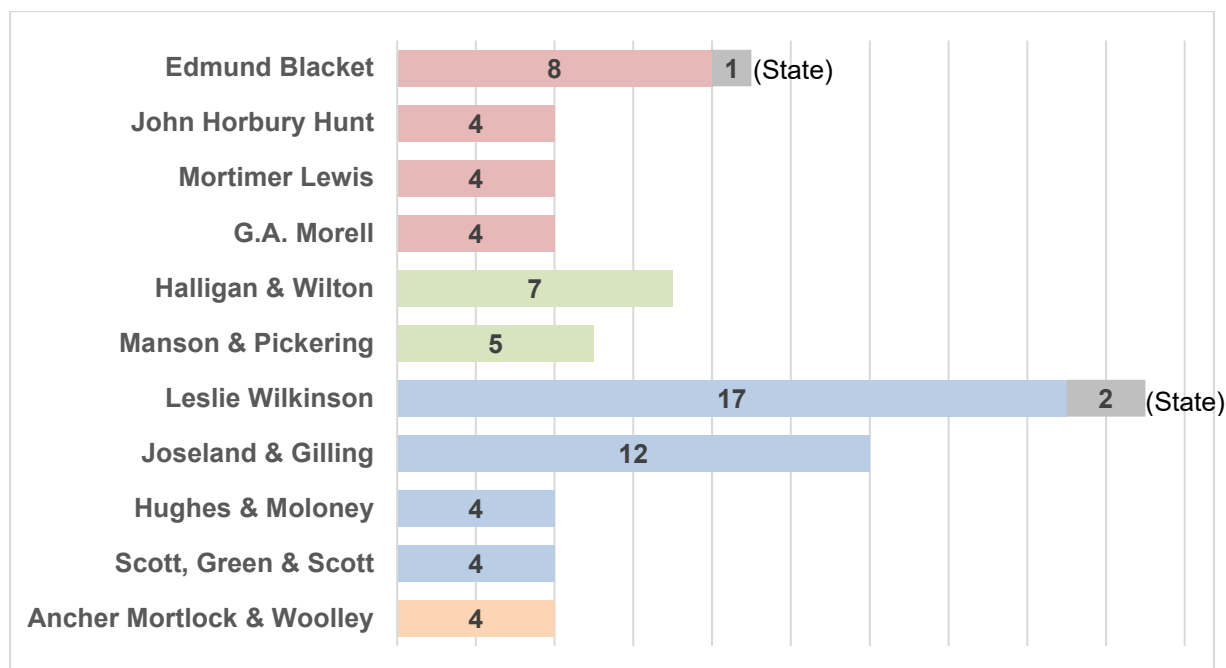


Figure 14: The most representative Architects in Schedule 5 organised by era of development. Items with less than 4 items are not shown on this bar chart.

Other prominent architects and architectural offices appear on the recently digitised Building Index and street cards (see Figure 15), but are not present in Schedule 5.<sup>11</sup>

In addition to this, the Australian Institute of Architects (NSW Chapter) maintains a Register of Significant Architecture (AIA Register) to focus on preserving buildings of merit. It is likely that some of those buildings would fit the heritage threshold.

Award winnings designs could also be reviewed to research, in particular, award-winning buildings. Some of them are in the Woollahra LGA. It is likely that designs of important architects are under-represented in Schedule 5.

<sup>11</sup> The Building Index and the street cards are being uploaded on the Digital Archive of the Local History Centre of Woollahra Libraries.

YEAR	APP. NO.	OWNER	BUILDER	TYPE OF BUILDING	HOUSE NO.	LOT	SEC	
34	234	SMITH, J. & M.	SPRING BROWN, E.	House & gar.		2		
"	153	RHEUBEN, O.	JOSELAND & GILLING	12 flats 4 gar.	Cnr. Longworth Ave 3.	5		
32	96	MACRAL, A.	PITT, E.	5 flats 5 gar.	Cnr. Wolseley Rd	A		
30	166	KLOSTER, C.	H. FRANCIS & Sons	Alts. & Adds.	Mimihau			
"	164	KLOSTER, C.	H. FRANCIS & SON	Conv. to 2 flats		B	6	
"	76	GILCHRIST, S.	JOSELAND & GILLING	7 garages		3-4		
"	32	RYBOK, W.	BARTROP, W.	Garage		4	4	
29	94	KLOSTER, C.	H. FRANCIS & SON	House & gar.		B	6	
28	461	COCKSHOTT, H.	KENT & MASSIE	Alts. & Adds.	7-9 St. Aubyn	5-6	6	
"	346	BARRINGTON, Dr.	FARR, W.	Additions	Wongern			
"	116	CAMERON, Mrs. S.	SCOTT, GREEN & SCOTT	Garage	Plas Isa			
"	114	BINNIE, Miss	BRAILEY, A.	Alts. & Adds.	Seaward			
26	235	CLAYTON, M. & C.	HARPER, T.	Alts. & Adds.		Rawhiti		
"	154	MASSIE, H.	STUART BROS.	House & gar.		13 & 14	4	
WYUNA ROAD, POINT PIPER								-2-

Figure 15: extract from the Yellow Cards (Source: Digital Archive, Local History Centre of the Woollahra Libraries)

## 4.7 Levels of Significance

36 items in Schedule 5 are of State significance, 710 entries are local heritage items and one item is part local, part State (the Wentworth Memorial Church). The majority of State items are in Darling Point, followed by Vaucluse, Double Bay and Paddington.

Two items have been identified of being of National significance (South Head in Watsons Bay and the Macquarie Lighthouse station in Vaucluse by virtue of listing on the National Heritage List, however this is not reflected in Schedule 5 which identifies them as being of State significance. There are no items of World significance in Woollahra.

Given the history of Woollahra and its being one of the earliest settlement in NSW, such low numbers of State significant items is surprising. This gap may be caused by the fact that the two major heritage studies were undertaken before the 1999 amendment of the *Heritage Act, 1977* when the local/State distinction became policy.

A review of the level of significance of items listed prior to 1999 should be considered in any future heritage study review.

## 4.8 Gaps: Summary of findings

Having reviewed the above analysis, the following gaps have been identified:

- Some Items groups are under-represented given Woollahra's history, including:
  - Transport – Water,
  - Archaeological - Maritime,
  - Commercial, manufacturing and processing
  - Recreation and Entertainment/Parks & Gardens,
  - Community Facilities, and
  - Parks and Gardens.
- There is scope to research the work of prominent architects in Woollahra, based on the constant digitisation of Council's Building Index and Minutes.
- Post-war and Late 20<sup>th</sup> century architectural styles appears under-represented, which translates in a gap of styles from these eras of development.
- Item types are not consistent with the LEP Standard Instrument (archaeological items in particular).
- Levels of significance of early listings are not consistent with current practice establishing the local, State and National levels of significance.



Figure 16: View of Kincoppal and Rose Bay (Source: Photoshelter)



## 5. Filling the Gaps

### 5.1 A proactive v a reactive approach to heritage listing

The aim of the Heritage Gap Analysis is to identify gaps in Schedule 5 and plan for future heritage studies in an orderly manner in accordance with a Strategy and an Action Plan. This is considered a **proactive** approach, based on the undertaking of heritage studies and assessments on a regular basis while considering heritage an ever-evolving concept.

On the other hand, a **reactive** approach is based on *ad hoc* heritage assessments arising from development applications, sales advertisements, Interim Heritage Orders and notices of motions. This approach increases litigations (court cases), brings a perception of unfairness for Applicants and ultimately facilitates loss of significant heritage.

In this section are suggestions for a proactive approach to heritage and for new heritage studies, based on consultation from Councillors and staff.

### 5.2 Other Heritage Registers

There are properties in Woollahra that are listed on other statutory heritage registers under the NSW or Commonwealth legislation. These statutory registers must be taken in consideration during development proposals, but Council is not a direct regulator or custodian of these registers, with their management occurring upon State and Commonwealth Agencies.

With the exception of the State Heritage Register, the criteria used to assess these items do not strictly coincide with the NSW heritage criteria. It is likely that these items may meet the threshold for listing in Schedule 5 of the Woollahra LEP 2014.

#### A. 5.2.1 Comparison with other statutory heritage registers

Table 8 is a comparison between items listed on Schedule 5 juxtaposed with those listed on other heritage registers (both statutory and non-statutory).

Other Heritage Registers	Listed	Listed in Schedule 5	Not listed in Schedule 5
State Heritage Register (SHR) under the NSW Heritage Act, 1977	31	31	n/a
S170 Heritage and Conservation Registers (Various Government Agencies) under the NSW Heritage Act, 1977	101	55	46 (17 in HCA)
Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005	25	8	17 (2 in HCA)

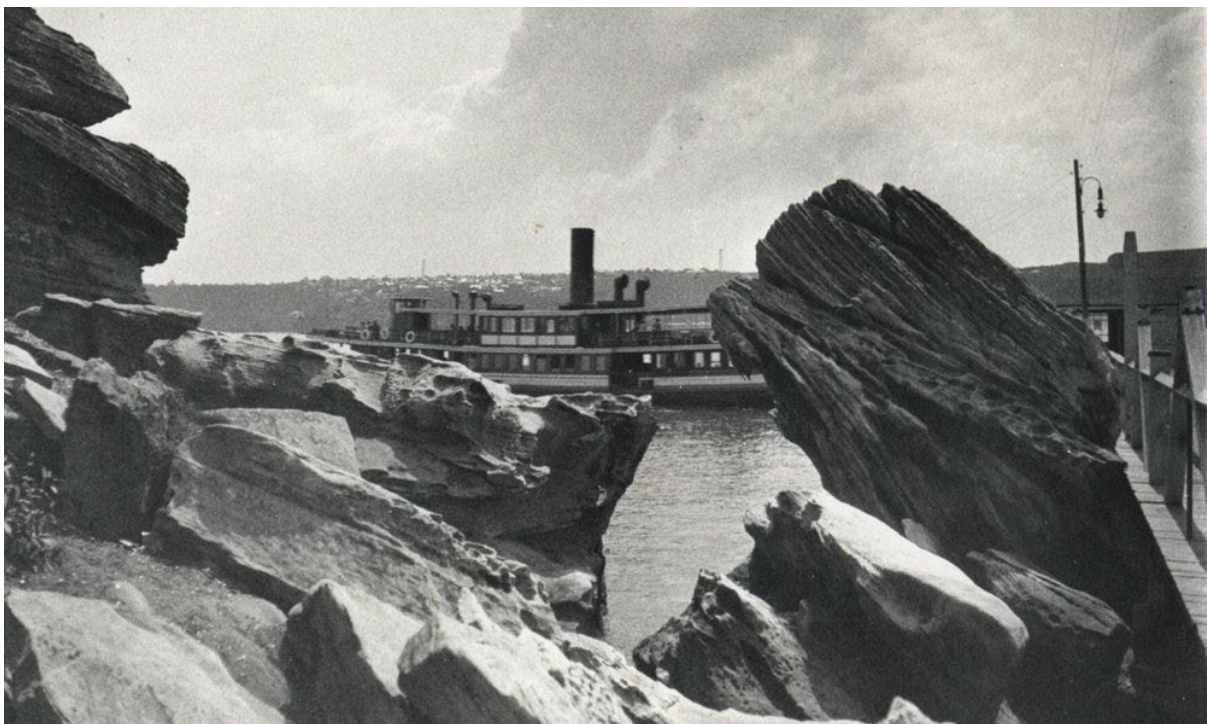
Table 7: Overview of items listed in Woollahra on other statutory and non-statutory heritage registers

It is interesting to note that some of the items listed under S170 heritage registers refer to buildings interface between water and land, which corresponds to a gap identified in section 4 of this report.

For example, the Watsons Bay Pilot Station in Marine Parade, Watsons Bay is listed on the NSW Maritime heritage register, but is not listed in Schedule 5. Similarly, Parsley Bay Ferry Wharf is listed on the Sydney Regional Environmental Plan (Sydney Harbour Catchment 2005) but is not listed in Schedule 5 (see Figure 17).

Other examples are Electricity Substations, Sewage Pumping Stations and the Edgecliff (Rushcutters Bay) Viaduct among others.

For a full list of other statutory and non-statutory heritage registers, refer to **Appendices A and B**.



*Figure 17: Parsley Bay Wharf, Vauclose, undated (Source: City of Sydney Archives, Graeme Andrews)*

### **B. 5.2.2 Comparison with Non-Statutory Heritage Registers**

Non-statutory heritage registers are authoritative guides to heritage significance for their historic and social connection of a community. They are also listed based on criteria, but do not strictly coincide with the NSW Heritage criteria. It is likely that some of the items listed on other statutory and non-statutory heritage registers would meet the criteria for local listing.

From a comparison between architects of buildings in Schedule 5 and architects appearing on the Australian Institute of Architects Register of Significant Architecture (AIA Register), there seems to be scope for filling some of those gaps also identified in Section 4.10.

Non-statutory heritage registers are held by the National Trust of Australia (NSW), the Australian Institute of Architects (NSW), the Australian Government, DoCoMoMo Australia, Engineer Australia and the NSW Office for Veteran Affairs.

Non-Statutory Heritage Registers	Listed	Listed in Schedule 5	Not listed in Schedule 5
National Trust of Australia (NSW)	266	242	24 (4 in HCAs, 7 demolished)
Australian Institute of Architects	92	49	43 (11 HCA, 3 demolished)
Register of the National Estate	2	1	1 (demolished)
DoCoMoMo Register	2	2	n/a
Australian Engineering Heritage Register	None	None	N/A
NSW War Memorial Register	2	1	1 (Memorial in Steyne Park)

Table 8: Overview of items listed in Woollahra on other statutory and non-statutory heritage registers

For a full understanding of other statutory and non-statutory heritage registers, refer to **Appendices A and B**.

### 5.3 Previous Heritage Studies

Some previous heritage studies nominated heritage items that did not eventuate as entries in Schedule 5. For example, the 1984 Woollahra Heritage Study nominated 347 items but 264 got eventually listed. One of these is Rushcutters Bay Park that was subject to an Interim Heritage Order in 2018.

Heritage philosophy and awareness can vary across communities over the years and it is likely that some of Council decisions taken in the past may differ today. The following table compares the number of nominated items, and what is currently represented in Schedule 5.

In conclusion, another way to ‘fill the gaps’ could be to revisit some of those heritage nominations and assess if they still qualify for heritage listing.

Key Studies	Heritage Items created	Listed in Schedule 5	Not recommended for a planning proposal
<b>1984 Woollahra Heritage Study</b>	Completed – 347 Nominated Items	264 listed	83 (30 of these are in HCAs, 14 have since been demolished)
<b>1991-5 Significant Trees Register</b>	Completed	All	See footnote <sup>12</sup>

<sup>12</sup> At the time of writing this report, this research hasn’t been finalised.

Key Studies	Heritage Items created	Listed in Schedule 5	Not recommended for a planning proposal
1997-8 Tanner Study	Completed – 200 Nominated Items	50 listed	150 (32 of these are in HCAs, 37 have since been demolished)
2002-6 Thematic Histories	Incomplete – Phases 2 and 3 never undertaken 1. Concise thematic histories for Woollahra, Bellevue Hill, Darling Point, Double Bay, Rose Bay and Vaucluse 2. Potential heritage items 3. Maps of historic settlement – produced on Council's land information system		
2004-6 Contemporary Buildings Study	Completed – 18 Nominated Items	10 Items listed	8 (3 of these are in HCAs)

Table 9: Overview of items listed in Woollahra on other statutory and non-statutory heritage registers

## 5.4 Consultation

In preparing the Heritage Gap Analysis, a series of internal consultations has taken place between Council's heritage staff, current and former Managers, current and former Directors.

Consultation was also sought with elected members of the Council, presented during a Councillors Briefing occurred on 16 September 2020.

The Councillors expressed great interest in the Heritage Gap Analysis findings and recommendations and generally endorsed the methodology, while proposing fresh ideas to the team, such as:

- Prioritise **heritage interpretation** and promotion (including social media) of Woollahra's heritage,
- Support **revisiting** of previous heritage studies & **finalising** current studies,
- Include the **DCP** amendments into the action plan,
- Highlight the importance to **celebrate** work that has been done so far in the last 40 years, and
- Support undertaking **new heritage studies**.

## 5.5 Proposed New Heritage Studies

In order to follow a proactive approach, and having considered the gaps identified in section 4, below is a proposed list of new heritage studies.

### A. LGA wide studies

In 2002 Council progressed the thematic histories for Woollahra/West Woollahra, Bellevue Hill, Darling Point, Double Bay, Rose Bay and Vaucluse. However, what hasn't been progressed for the LGA since this time are thematic studies for each geographic area based on certain categories. Council staff suggest focusing on areas subject to high development pressure and instigate studies that address and consider the following:

- Significant architecture (various eras and styles)
- Cultural landscapes (including parks, gardens, reserves, beaches, etc.)
- Items listed on other statutory and non-statutory heritage registers
- Commercial, community and recreational buildings
- Water-land interface buildings and maritime archaeology
- Items providing evidence of the area's historic development
- Items associated with local personalities (including women)

### B. Modernism

Woollahra has a rich history of migrant heritage from before and after the Second World War and migrant (émigré) architects were responsible for spreading the seeds of Modernism in Australia.

Exhibitions such as 'Sydney Moderns' held by Sydney Living Museums in 2017 and the Interim Heritage Order on Trelawney Court have highlighted a large gap in having representative Post-War and Modernist representation in Schedule 5.

The main challenges facing Woollahra's Modernist heritage is the lack of heritage recognition afforded by communities, which often remains undervalued until an application for demolition is lodged. An example of this is Gaden House by Neville Gruzman, which prompted a campaign to save this building and provide it with a statutory protection.

Investigation of Modernism in Woollahra is an opportunity to provide insight and understanding of settlement patterns and places of cultural significance for émigré communities within the Municipality, and will also demonstrate the influence of prominent Australian architects from migrant backgrounds.



## 6. Heritage Strategy

### 6.1 Goals of the Heritage Strategy

This Heritage Gap Analysis proposes a strategy to fill the gaps in the current listings and management practices.

The following Heritage Strategy has been prepared based on four overarching goals:

- GOAL 1: Finalise existing heritage studies and assessments
- GOAL 2: Manage Woollahra's Heritage
- GOAL 3: Celebrate Woollahra's Heritage
- GOAL 4: Fill the gaps (new Heritage Studies)

### 6.2 GOAL 1: Finalise existing Heritage Projects

The following heritage studies have not been finalised. It is likely that some of the gaps noted in Chapter 4 of this report may be filled with the finalisation of the current heritage studies.

#### A. Finalise current heritage studies and assessments

The following studies are currently on the Heritage work program and have outstanding Notice of Motions and Council's resolutions:

- Leslie Wilkinson Heritage Study (2008)
- Inter-War Flat Buildings Heritage Study (2011)
- Arts and Crafts Buildings Heritage Study (2011, 2019)
- Places of Worship Heritage Study (2019)
- Significant architects heritage study (2019)
- Rose Bay Public School Old School Hall and McAuley Catholic School and Outbuildings Heritage Assessments (2019)
- Bay and Knox Street, Double Bay heritage assessments (2021)
- 543-549 Glenmore Road, Edgecliff (2021)
- 58 – 88-90 Oxford Street Woollahra (2021)

#### B. Undertake all Council's heritage resolutions

The following heritage assessments have been subject to Council resolutions but have not commenced:

- Significant Architects
- Bay and Knox Street heritage assessments
- 58 – 88-90 Oxford Street Woollahra
- 543-549 Glenmore Road, Edgecliff

**ACTION:** Undertake outstanding Council's heritage resolutions

## 6.3 GOAL 2: Manage Woollahra's Heritage

### A. Maintain a robust DCP

In order to continue a high level assessment of development applications being lodged and good heritage outcomes, the Woollahra DCP 2015 needs to be maintained at a high level and consistent with best heritage practice. The following table lists DCP Amendments that are proposed to strengthen heritage provisions in the Woollahra DCP 2015.

Future DCP Amendment	Notes
Update the Double Bay Centre Chapter of the Woollahra DCP Study	This will be undertaken in accordance with the outcomes of the Bay and Knox Street heritage assessments NOM at 6.2 B.
Update the Woollahra HCA provisions (Chapter C2)	<p>The latest update to Chapter C2 were in 2007 when the parking and garages provisions were included. Clause 2.7 Schedule of Contributory Items needs to be updated and reviewed in light of recent approvals.</p> <p>Other provisions such as the single storey buildings provisions are also due an update.</p> <p>Include provisions to protect contemporary and Post-War buildings in HCAs.</p>
Update the Watsons Bay HCA provisions (Chapter C3)	<p>Review statements of significance to include contemporary and Post-War architecture.</p> <p>Review the grading of significance of each item in each precinct.</p> <p>Introduce provisions to protect contemporary and Post-War buildings in Watsons Bay.</p>

Table 10: Overview of future DCP Amendments

#### **ACTION:** Undertake DCP Amendments

### B. Continue assisting with DAs assessments and Court appeals

Council's heritage officers provide specialist heritage advice as part of the development applications process (heritage referral responses) and provide expert witness services for appeals in the NSW Land and Environment Court.

DAs and appeals have statutory timeframes to meet and this has resources implications for strategic planning.

As an example, in 2019, 891 development applications were lodged (9 of which were S8.2 review applications, 359 of which were S4.55 applications). Of these, 277 required a heritage referral response. 39 appeals in the Land and Environment Court have been lodged for the 2019 calendar year, most of which have required the input of a heritage expert. These figures illustrate the considerable resources required from our heritage officers involved in providing advice to the Development Control team.

#### **ACTION:** Continue providing heritage specialist advice of a high standard for DAs and appeals in the NSW Land and Environment Court.

### **C. Continue updating the Heritage Inventory Sheets**

Updating and reviewing heritage inventory sheets for existing heritage items is necessary to properly manage Woollahra's environmental heritage.

Inventory sheets are currently updated based on a priority list which considered the level of risk of an item. For example, there are areas of the Municipality that have a higher development pressure based on the number of applications lodged in the last financial year.

Since April 2019 (when the priority list was implemented), 112 heritage items have had their inventory sheet updated.

**ACTION:** Review and update all heritage inventory sheets

### **D. Consolidate Schedule 5**

#### ***Combine individual items that are part of the same cultural landscape***

There are a few instances of open spaces in the LGA where an itemised approach to heritage listing in open spaces has led to inconsistencies in heritage management compared with built heritage items.

For example, Green Reserve in Laings Point, Watsons Bay has been explained in 4.3. There are however also other open spaces in Woollahra LGA where the same approach to heritage listing is evident.

Listing the significance of individual items forming part of the same cultural landscape will:

- Identify the heritage significance of an open space "as a whole";
- assist with the management of open spaces; and
- will considerably reduce the number of heritage inventory sheets needing to be reviewed.

**ACTION:** Consolidate Schedule 5

- Undertake a review of Schedule 5 to identify items that could be combined in a single listing, including cultural landscapes and built heritage

#### ***Ensure item types are consistent with the LEP standard instrument***

The Woollahra LEP 1995 listed all heritage items in Schedule 3 Heritage items, with no distinction of item types. Conservation areas were also not included in Schedule 3, being only identified on Heritage Maps.

In 2006, the Department of Planning introduced the Standard Instrument for all local environmental plans. The Woollahra LEP 1995 was subsequently repealed and replaced by the new Woollahra LEP 2014 which is still current and is based on an enforced standard template across all NSW local government areas.

The listing of items can be found in Schedule 5 Environmental Heritage. Schedule 5 Environmental Heritage distinguishes between heritage items (Part A), conservation areas (Part B) and archaeological items (Part C).

From a review of existing items in Schedule 5, some archaeological items are included in Part A Heritage Items instead of Part C Archaeological items. For example, "Remains of Vaucluse Point ferry wharf" (Item 357) is missing from Part C. Any review of Schedule 5 should identify item type inconsistencies and provide recommendations to address this.

This action may be undertaken when the heritage significance of each heritage item becomes evident as we progress with the updating of heritage inventory sheets.

**ACTION: Consolidate Schedule 5**

- Review item type of each item of environmental heritage

**Verify levels of significance of all items in Schedule 5**

The State and local levels of significance were only formally introduced with the amendment of the NSW Heritage Act in 1999, following the undertaking of the two major Woollahra heritage studies (1984 Hughes Trueman Ludlow and 1997-8 Tanner Study). It is likely that some of the items that got listed on the LEP would meet a State level of significance.

It is therefore recommended that, as part and during the review of the heritage inventory sheets, the levels of significance of existing heritage items are also reviewed.

**ACTION: Consolidate Schedule 5**

- Verify levels of significance of listed environmental heritage.

## **6.4 GOAL 3: Celebrate Woollahra's Heritage**

Among the findings of the consultation process, a strong urge to Celebrate Woollahra's heritage has emerged.

### **A. Celebrate Heritage through Exhibitions and Events**

Celebration of heritage will provide opportunities for sharing stories and promote community identity through events such as exhibitions, awards and talks.

During the current Woollahra Aboriginal Heritage Study, Staff organised a series of talks to promote the study and inform the community on the area's aboriginal connections. They were a cross-department project that have proved to be successful in generating interest and participation in the community. Every heritage study should be an opportunity to celebrate our heritage with the community.

The Woollahra Design Excellence Awards highlight and acknowledge examples of buildings and places that make an excellent contribution to the character and heritage of Woollahra.

Another way to celebrate our heritage is to organize heritage-themed exhibitions once a study or an assessment is finalized. Historic photographs of the listed items or panels on the history of a place could be used to generate interest in Woollahra's heritage.

These initiatives allow Council to engage positively with the community. Strategic Planning could provide regular assistance and partnership with the Community and Customer Experience team in planning and creating content for these events. The enhancement of a cross-departmental collaboration will facilitate coordination of projects with similar goals, save duplication of resources forces and will and ultimately enhance the community experience.

**ACTION: Continue celebrating Heritage**

- Promote the Design Excellence Awards on a biannual basis
- Provide assistance and partnership with Community and Customer Experience team for exhibition and events

## **B. Maintain Heritage's online presence**

Maintaining a meaningful web presence in relation to Heritage is essential. Council's heritage officers regularly maintain webpages from Council's website and Your Say Woollahra.

Partnership within Council's divisions should continue to reinforce and spread heritage news such as new DCP Amendments, IHOs, gazettal of new heritage items, and public exhibition documents.

Adopted heritage studies should be made available online on Council's website. Heritage studies are a useful resources to discover and promote the local history, and inform owners and applicants and their consultants of the rationale behind a heritage constraint. Being public documents, they should be readily available without researching the individual EPC Agendas.

A new webpage should also include a formal nomination process to encourage the community to engage and nominate potential heritage items during heritage studies.

**ACTION:** Continue celebrating Woollahra's heritage

- Continue maintaining heritage related webpages on Council's website

## **C. Promote Heritage Interpretation**

Heritage interpretation is a means of sharing culture and history within communities and is an integral part of presenting the significance of an item or a place. It can be achieved through a range of activities and focus on tangible heritage such as be precincts, buildings, open spaces, archaeological relics and underwater archaeology, but also intangible heritage, such as cultural landscapes and socially significant places.

Interpretation can be in the form of activities and events, signs, publications, audio, video, artworks, trails and online activities. With modern technology, interpretation can also be achieved through the promotion of specific mobile applications. Interpretation enhances understanding and enjoyment by appealing to different levels of experience and knowledge, as well as to different learning styles.

Heritage Interpretation can be used to protect and interpret significant remnants of our conservation areas' urban history such as archaeological relics sandstone walls, but also underwater heritage, built heritage and open spaces.

Recent archaeological discoveries have outlined the lack of a coordinated strategy to deal with heritage interpretation. A coordinated approach to all aspects of heritage interpretation improves wayfinding, contributes to placemaking and overall promotes heritage identification and respect from the community.

Placemaking and wayfinding initiatives could be used to revitalise historic main commercial streets in Woollahra.

**ACTION:** Develop a Heritage Interpretation strategy for archaeological findings (both on land and in the water) and built heritage.



## 6.5 GOAL 4: Fill the Gaps in Schedule 5 (new Heritage Studies)

### A. Undertake new heritage studies

There are different ways to ‘fill the gaps’ and identify new heritage listings.

Undertaking all new heritage studies proposed at section 5.5 of this report would have a significant impact on Council’s resources. The identification of a coordinated and integrated approach, the identification of priorities and a timeframe to undertake these projects is essential to establish a sustainable heritage work program for strategic planning over the future years.

Theme	Comments
Modernism architecture heritage study	High redevelopment pressure and perceived lack of recognition.
Cultural landscapes heritage study	Mostly Council’s managed assets subject to regular maintenance and upgrades with limited heritage information. Some open spaces have never been comprehensively heritage assessed.
Commercial Centres heritage study	Some of these areas are already subject to HCA protection.
Water-land interface heritage study	Low development pressure, some already listed on statutory heritage registers.
Community and Recreational Buildings Heritage Study	Low development pressure, some already included in HCAs or managed/owned by Council.
Historical development pattern heritage study	Further research and analysis is required to understand the extent and scope of this heritage study.
Local personalities heritage study, including the place of women in the history of the development of the area.	Further research and analysis is required to understand the extent and scope of this heritage study. Heritage interpretation may suffice.
Manufacturing and processing (industrial heritage study	Most of these building groups are located in Paddington, which already offers a form of protection through a HCA listing.

Table 11: List of proposed new heritage studies

**ACTION:** Undertake new heritage studies based on a Council endorsed heritage program.

### B. Remain vigilant on development threats

Each heritage study project has specific limitations and scope in order to be achievable within a specific timeframe. This inevitably leads to gaps in Schedule 5 that is evident when a development threat occurs.

Accordingly, we do not believe that a reactive approach on heritage conservation can ever be fully prevented. However, it can be significantly reduced.

**ACTION:** Remain vigilant on development and threats to unlisted heritage.

### **C. Review other/previous heritage listings and assessments**

#### ***Review other statutory and non-statutory Heritage Registers***

A review of other statutory and non-statutory heritage registers has potential to identify environmental heritage that meets the NSW heritage criteria and is not currently listed in Schedule 5.

**ACTION:** Review, assess and list items listed on other statutory and non-statutory heritage registers

#### ***Revisit Previous Heritage Studies***

Heritage is a constantly evolving concept, and the heritage industry has changed and evolved since the early 1980s heritage studies. A review of previous heritage studies nominations has potential to identify environmental heritage that meets the NSW heritage criteria and is not currently listed in Schedule 5.

**ACTION:** Review and assess heritage items nominated in previous heritage studies

## **6.6 Summary of Heritage Strategy**

### **GOAL 1: Finalise current heritage projects**

- a. Finalise current heritage studies and assessments
- b. Undertake all Council's heritage resolutions

### **GOAL 2: Manage Woollahra's Heritage**

- a. Maintain a robust DCP
- b. Continue assisting with DAs assessment and court appeals.
- c. Continue updating the Heritage Inventory Sheets
- d. Consolidate Schedule 5

### **GOAL 3: Celebrate Woollahra's Heritage**

- a. Celebrate Heritage through Exhibitions and Events
- b. Maintain Heritage's online presence
- c. Promote Heritage Interpretation

### **GOAL 4: Fill the gaps in Schedule 5 (new Heritage Studies)**

- a. Undertake new heritage studies
- b. Remain vigilant on development threats
- c. Review other/previous heritage listings and assessments

## 7. Action Plan

### 7.1 Timeframes and priorities for actions

Each action identified in Section 6 is provided with a priority and a timeframe.

The identified timeframe is an assumption based on the current level of staff resources and allocated budget. Any change to staff and budget resources has not been considered. It is recommended that an update to the timeframe is undertaken should the staff and budget resources vary.

The indicated timeframe for high priority actions does not include the statutory timeframes, required to undertake a Planning Proposal or a DCP Amendment, only the time required to present the assessments and studies to the Environmental Planning Committee.

Type of Action	Priority	Timeframe
Short term actions	High	Finalised within 18 months
Medium term actions	Medium	Finalised within 3 years
Long term actions	Low	Finalised within 10 years
Ongoing Actions	High	Ongoing

Table 12: Table listing timeframes for actions

### 7.2 High priority actions

#### **ACTION:** Finalise outstanding heritage studies and assessments

Levels of priorities identified below provide an order in the undertaking of each project, with no.1 being the most immediate project and 3 being the least immediate project.

Outstanding heritage studies and assessments	Timeframe required	Level of priority
Places of Worship Heritage Study	12 months (remaining)	1 (Current project)
Significant architects heritage study	18 months	1 (Current project)
Rose Bay Public School Old School Hall and McAuley Catholic School and Outbuildings Heritage Assessments	6-12 months	2
Leslie Wilkinson Heritage Study	12 months remaining	2
Arts and Crafts Buildings Heritage Study	18 months remaining	3
Inter-War Flat Buildings Heritage Study	12 months remaining	3

Table 13: Table outlining level of priority and timeframe required for each outstanding project

**ACTION:** Undertake outstanding Council’s heritage resolutions not commenced

Outstanding heritage studies and assessments	Timeframe required	Level of priority
Bay and Knox Street heritage assessments (Double Bay)	6 months	1
Moderne heritage study <sup>13</sup>	18 months	2
543-549 Glenmore Road, Edgecliff	6 months	3

Table 14: Table outlining level of priority and timeframe required for each outstanding Council resolution

### 7.3 Medium priority actions

Actions with medium priority are expected to be finalised within the next three years.

**ACTION:** Undertake new heritage studies, based on a Council endorsed heritage program

1. LGA wide review

- Cultural landscapes (including parks, gardens, reserves, beaches, etc.)
- Items listed on other statutory and non-statutory heritage registers
- Commercial, community and recreational buildings
- Water-land interface buildings and maritime archaeology
- Items providing evidence of the area’s historic development
- Items associated with local personalities (including women)
- Review and assess heritage items nominated in previous heritage studies

The focus of the LGA wide review will be on specific suburbs priorities, subject but not limited to their development pressure.

- Vaucluse
- Bellevue Hill
- Rose Bay
- Double Bay

2. Heritage Assessment of 58 – 88-90 Oxford Street Woollahra

3. Heritage Assessment of Bi-Centennial Flats at 2A Queen Street Woollahra

**ACTION:** Undertake new DCP Amendments:

- a. Update the Double Bay Centre Chapter of the Woollahra DCP 2015 (pending the recommendations of the Bay and Knox Street heritage assessments NOM).

**ACTION:** Develop a Heritage Interpretation strategy for archaeological findings (both on land and in the water) and built heritage.

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<sup>13</sup> On 11 April 2022, Woollahra Council considered the advice from the Woollahra Local Planning and resolved: “THAT consistent with the adopted Woollahra Heritage Gap Analysis, Council progress the heritage program with a proactive approach to heritage identification and conservation including a Modern Heritage study.”

## 7.4 Low priority actions

Actions with medium priority are expected to be finalised within the next 10 years, as per Table 15.

**ACTION:** Undertake new DCP Amendments:

- a. Update the Watsons Bay HCA Chapter of the Woollahra DCP 2015
- b. Update the Woollahra HCA Chapter of the Woollahra DCP 2015

**ACTION:** Consolidate Schedule 5

- a. Undertake a review of Schedule 5 to identify items that could be combined in a single listing, including cultural landscapes and built heritage
- b. Review item type of each item of environmental heritage
- c. Verify levels of significance of listed environmental heritage

## 7.5 Ongoing actions

**ACTION:** Continue providing heritage specialist advice for DAs and appeals in the NSW Land and Environment Court.

Maintain current resources to provide specialist advices in the assessment of development applications and providing expert witness services.

**ACTION:** Remain vigilant on development and threats to unlisted heritage.

Continue reviewing development applications and complying development certificates to minimize loss of unlisted heritage and issue Interim Heritage Orders under S25 of the *NSW Heritage Act, 1977*.

Ensure there are resources to undertake *ad hoc* heritage assessments in the event of a threat.

**ACTION:** Review and update all heritage inventory sheets

This is an ongoing project undertaken by Council's heritage officers in accordance with a priority list based on items' risk.

**ACTION:** Continue celebrating Woollahra's heritage

- a. Promote the Design Excellence Awards
- b. Provide assistance and partnership with Community and Customer Experience team for exhibition and events
- c. Continue maintaining heritage related webpages on Council's website

## 8. Conclusions and Recommendations

### 8.1 Summary

Woollahra has a rich and diverse history and natural setting that is represented in Victorian, Federation, Inter-War and post-1950 buildings, precincts and streetscapes. This environmental heritage has a local, state and, in many instances, a nationally recognised level of significance.

Schedule 5 Environmental Heritage of the Woollahra LEP 2014 is the result of over 40 years of strategic planning work undertaken collaboratively by Council staff, heritage specialists, Councillors and relentless volunteers and interested parties to research and identify Woollahra's heritage.

The Woollahra DCP 2015 complements and supports heritage protection through the constant update and review undertaken by Staff.

This Heritage Gap Analysis has identified opportunities for improvement of Schedule 5 of the Woollahra LEP 2014, has provided an analysis of the current heritage work program and gives a vision for the future heritage program.

### 8.2 Endorsing the Heritage Strategy and the Action Plan

The Heritage Strategy aims to propose a 10 year strategy to undertake new heritage studies in order to fill identified gaps in a time efficient way and based on a Council endorsed Action Plan at section 7 of this report. It is recommended that Council endorses the strategy and the priorities identified in the report.



## Appendix A: Other Statutory Heritage Registers

List of Other Statutory Heritage Register	
<b>World Heritage List</b>	<p>World Heritage sites are places that are important to and belong to everyone, irrespective of where they are located. They have universal value that transcends the value they hold for a particular nation.</p> <p>These qualities are expressed in the <i>Convention concerning the Protection of the World Cultural and Natural Heritage</i> (the World Heritage Convention).</p> <p>Australia is a member of the UNESCO World Heritage Committee.</p> <p>There are no items listed in the Woollahra local government area that are on the World Heritage List.</p> <p>No further action is required.</p>
<b>Commonwealth Heritage Register</b>	<p>The Commonwealth Heritage List is a list of Indigenous, historic and natural heritage places owned or controlled by the Australian Government.</p> <p>These include places connected to defence, maritime safety, communications, customs and other government activities that also reflect Australia's development as a nation.</p> <p>There are currently 10 items listed on the CHL for Woollahra and they are all listed in Schedule 5.</p> <p>No Further action is required.</p>
<b>National Heritage List</b>	<p>The National Heritage List is Australia's list of natural, historic and Indigenous places of outstanding significance to the nation.</p> <p>There are no items listed on the NHL for Woollahra.</p> <p>No further action is required.</p>
<b>State Heritage Register</b>	<p>The State Heritage Register (SHR) is a collection of places, buildings, works, relics, moveable objects or precincts significant to the State of NSW in relation to their historical, scientific, cultural, social, archaeological, architectural, natural and/or aesthetic values. Items listed on the SHR are listed under the <i>NSW Heritage Act, 1977</i> (the Heritage Act).</p> <p>There are 31 items listed on the SHR in Woollahra under the Heritage Act. Missing items will need to be included in Schedule 5 of the Woollahra LEP 2014.</p> <p>The SHR has 4 items that are only partially listed in Schedule 5.</p> <p>No further action is required.</p>
<b>Section 170 Heritage and Conservation Registers</b>	<p>Under Section 170 of the Heritage Act, each Government Agency has a statutory obligation to maintain a Heritage Conservation Register of the properties they own.</p> <p>Within the Woollahra government area are items listed under Section 170 of the Heritage Act owned by different Government Agencies, as identified in the following list:</p>

**List of Other Statutory Heritage Register**

	<b>Government Agency</b>	<b>Number of Items in Woollahra</b>
	National Parks & Wildlife Services	51
	Ausgrid	20
	Sydney Water	10
	NSW Maritime	8
	NSW Schools	4
	Roads and Maritime Services	3
	Sydney Ports Corporation	3
	RailCorp	2
	Health SNW	1
	Fire Brigades	1
	NSW Police Service	1
	<b>Grand Total</b>	<b>104</b>
	<p>Overall there are 103 items listed under Section 170 of the Heritage Act 1977 in Woollahra. Of these, only 59 are listed on Schedule 5 of the Woollahra LEP.</p> <p>It is likely that some of the items listed under Section 170 of the Heritage Act fit the criteria for local listing.</p>	
<b>Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005</b>	<p>The Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005, (Harbour REP), covers all the waterways of the Harbour, the foreshores and entire catchment. It establishes a set of planning principles to be used by councils for the preparation of planning instruments. Schedule 4 Heritage Items lists all items listed under this instrument.</p> <p>There are 25 items listed in the Woollahra local government area. Only 8 of them are listed in Schedule 5.</p> <p>It is likely that some of the items listed under the Harbour REP fit the criteria for local listing.</p>	

## Appendix B: Non-Statutory Heritage Registers

List of Non Statutory Heritage Register	
<b>National Trust of Australia (NSW)</b>	<p>The National Trust of Australia (NSW) maintains a Register of landscapes, townscapes, buildings, industrial sites, cemeteries and other items or places which the Trust determines have cultural significance and are worthy of conservation.</p> <p>The National Trust of Australia is the Australian national peak body for community-based, non-government non-profit organisations committed to promoting and conserving Australia's indigenous, natural and historic heritage. The National Trust has assembled a Register of heritage items and urban areas and is an advocate to influence local, State and Federal heritage strategies and policies.</p> <p>There are 266 items listed in the Trust Register, including natural, built and urban areas located in the Woollahra government area. 242 items are listed in Schedule 5 of the Woollahra LEP 2014. In addition to this, 3 items are in heritage conservation areas and 7 have been demolished.</p>
<b>Australian Institute of Architects (NSW)</b>	<p>In 2012, the Australian Institute of Architects NSW Chapter has renamed its Register of 20th Century Buildings of Significance to The Australian Institute of Architects Register of Significant Architecture (AIA Register) to focus on preserving buildings of merit, in particular, award-winning buildings.</p> <p>There are 92 buildings in the AIA Register located in the Woollahra government area. 49 of these are listed in Schedule 5 of the Woollahra LEP 2014. In addition to this, 11 items are in a heritage conservation area and 3 have been demolished.</p>
<b>Register of the National Estate</b>	<p>The Register of the National Estate (RNE) was originally established under the Australian Heritage Commission Act 1975. It is a list of natural, Indigenous and historic heritage places throughout Australia. In 2004, the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (the EPBC Act) introduced the National Heritage List and the Commonwealth Heritage List.</p> <p>From 19 February 2007 the Register has been frozen, meaning that no places can be added or removed. Since 2012, the RNE is no longer a statutory list but it acts as a repository of information and educational resource.</p> <p>There are 122 registered items in the RNE, including natural, built and urban areas located in the Woollahra government area. 120 items are listed in Schedule 5 of the Woollahra LEP 2014. One item missing from Schedule 5 but listed on the RNE been demolished.</p> <p>There are also 19 sites that have an Indicative status (meaning that was for those items was entered into the RNE database however a decision on whether the place should be entered in the RNE itself was not made before the RNE was closed in 2007). 4 of these are not listed in Schedule 5.</p>
<b>DoCoMoMo Register</b>	<p>The Australian working party for documentation and conservation of buildings, sites and neighborhoods of the modern movement (DoCoMoMo) aims to protect, educate and promote the significance of modern buildings and sites. DoCoMoMo maintains an online database of buildings, sites and neighbourhoods of the modern movement in Australia. It is one of the most</p>

<b>List of Non Statutory Heritage Register</b>	
	<p>comprehensive record of modern movement resources of the built environment in Australia.</p> <p>There are only two items documented by DoCoMoMo Australia in the Woollahra Municipality. These are Prevost House at 65 Kambala Road Bellevue Hill by Prevost and Ancher and the Wentworth Memorial Chapel by Clarke, Gazzard &amp; Yeomans in Fitzwilliam Street, Vaucluse. They are both listed in Schedule 5 of the Woollahra LEP 2014.</p> <p>No further action is required.</p>
<b>Australian Engineering Heritage Register</b>	<p>Engineers Australia (EA) established the Australian Historic Engineering Plaquing Program in 1984 as a means of bringing public recognition to engineering works of historic or heritage significance and to the engineers who created them.</p> <p>The program includes three categories of heritage significance at local, National and International level, and promotes heritage interpretation through the installation of markers and panels.</p> <p>The Eastern Suburbs Railway is the only item in Woollahra listed on this Register, with its marker being located in Martin Place, Sydney.</p>
<b>NSW War Memorial Register</b>	<p>The NSW War Memorials Register is a database of war memorials in New South Wales. It currently holds more than 3000 war memorial records, and more than 200,000 veteran records.</p> <p>The NSW War Memorials Register was launched by the Premier and the President of the Returned and Services League of New South Wales (RSL NSW) on 22 April 2002 as a joint initiative.</p> <p>There are currently two items in the Woollahra local government area and only one is listed in the Schedule 5.</p>