

Robertson & Hindmarsh Pty Ltd comments on “Written Submission to Heritage Advisory Committee regarding 6 Springdale Rd, Killara”, Letter from Mills Oakley dated 20 May 2020

Response prepared by
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Architects
on behalf of
Ku-ring-gai Municipal Council
4 June 2020

Introduction

On 2 June 2020, Robertson & Hindmarsh Pty Ltd was engaged to provide a response to the letter dated 20 May 2020 from Mills Oakley regarding 6 Springdale Road, Killara.

Referenced documents:

This report is to be read in conjunction with the following documents:

- Heritage Assessment Report: Potential Heritage Item: “Eastment House” 6 Springdale Road, Killara prepared by Robertson & Hindmarsh Pty Ltd, dated 16 April 2020 (referred to as the “Robertson Report” in the Mills & Oakley letter and as “R&H report” in this response),

Note, the architectural firm responsible for the design of the Eastment House is **Ancher, Mortlock, Murray & Woolley** (AMMW) and not Archer, Mortlock, Murray & Woolley as referred to in the Mills & Oakley letter (on its unnumbered page 4).

Preamble:

Dr Scott Robertson has been in private practice as an architect since completing his undergraduate architecture course in 1977. He gained a Master’s Degree in Building Conservation from the UNSW, was part-time practice Director of the RAIA (NSW), was a National Councillor of the RAIA and served as Honorary Treasure whilst on the Executive of the RAIA. He has travelled widely and toured many significant works of Modern architecture in Europe, Asia and the USA as well as in Australia. He is the current President of Docomomo Australia, is a member of the Docomomo International Advisory Board and is the English Editor of its Journal. He also organised the Architect Talks in conjunction with the then NSW Historic Houses Trust at Rose Seidler House, which were recorded for posterity.

Dr Scott Robertson has had considerable interaction with Ken Woolley and two of his significant projects. Dr Scott Robertson was involved with the Woolley House I (designed by Ken Woolley and listed on the State Heritage Register as a heritage item of State significance) at Mosman for over a decade, assisting the second owners of the house. During this time Dr Robertson spoke with Ken Woolley a number of times regarding the house. The house is now owned by its third owner, the University of NSW.

More recently, Dr Robertson interviewed Ken Woolley and the project architect, Dr John Cooke, regarding Town Hall House designed by Ancher, Mortlock, Murray & Woolley for the Sydney City Council (opened 1977). The interview was conducted as part of the preparation of the Conservation Management Plan of Town Hall House prepared by Robertson & Hindmarsh Pty Ltd in 2016. Town Hall House was the project listed in the AMMW job list immediately preceding the Eastment House and the Eastment building company was involved with Ken Woolley as the contractor for the Town Hall/St Andrews shopping and public square adjoining the Sydney Town Hall.

Response to Mills & Oakley letter dated 20 May 2020:

In order to respond to the relevant points made in the letter by Mills & Oakley we have tabulated the Mills & Oakley comments in the first column with our response in the second column.

Mills & Oakley letter dated 20 May 2020	Robertson & Hindmarsh Pty Ltd comment
<p>Un-numbered p. 1: <i>Our client provided Council and their heritage consultant with copies of original DA approved plans as well as letters from Mrs Eastment (the original owner of the property who engaged Mr Woolley to design the family house). However, The Robertson Report fails to address or give adequate consideration to a number of important issues which impact on the heritage assessment:</i></p>	<p>Responses to this generalised statement by Mills & Oakley (MO) are given below.</p>
<p>Un-numbered p. 2:</p> <ul style="list-style-type: none"> <i>The Robertson Report does not consider the evidence of Mrs Eastment regarding the involvement of Mr Woolley and various design elements of the house (see further information below). Mrs Eastment was present for the design and building of the house and has firsthand evidence as to the involvement of Mr Woolley;</i> 	<p>The short letter dated 4 March 2020 from Mrs Margaret Eastment was considered in the R&H report of 16 April 2020 as it was included at Appendix A in the referenced letter by Touring the Past dated 6 March 2020.</p> <p>Mrs Eastment's letter of 4 March 2020 confirmed that the house was designed by Ken Woolley, that the construction was by the Eastment's own building company and that, in the absence of Ken Woolley as supervising architect on site, changes were made by the Eastment's during construction.</p> <p>None of these points were ignored or denied in the R&H report dated 16 April 2020.</p>
<p>Un-numbered p. 2:</p> <ul style="list-style-type: none"> <i>The Robertson Report does not properly consider the approved plans for the property. For example, the Robertson Report places importance on the lack of a front street fence in terms of the Woolley design when in fact the original design included a front street fence which was approved by Council (although never constructed);</i> 	<p>This statement by MO is not supported by the facts and the claim is not substantiated by reference to any particular part of the R&H report.</p> <p>The approved plans by Ancher, Mortlock Murray & Woolley were included in the R&H report at Appendix B and were thoroughly examined as part of the preparation of that report. Section 6.2 of the R&H report details the important changes from the approved plans to the built reality. Not all the changes were listed but an explanation for the changes made was included as expressed by a practising architect (Dr Scott Robertson) who is well aware of the architectural design and construction process.</p> <p>At no point in the R&H report of 16 April 2020 does it "place importance on the lack of a front fence in terms of the Woolley design" as stated by MO.</p> <p>The R&H report only mentions the fence in section 8.1 (R&H p.26) in passing and in discussion of the importance of the front boundary trees. Its absence with respect to the original Woolley design is never mentioned.</p> <p>MO are making unsubstantiated claims with regard to the contents of the R&H report.</p>

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<p>Un-numbered p. 2:</p> <ul style="list-style-type: none"> <i>The Robertson Report does not acknowledge the large number of changes that have been made to the property by the Eastment family since approved by Council.</i> <p><i>The Robertson Report is premised on the property being intact and in original condition.</i></p> <p><i>However, as outlined in the Touring the Past Report (page 8) a large number of changes were made. These include the replacement of timber roof cladding, alterations to external window locations, updated window framing, alterations to the bathrooms and kitchen, replacement of the rear deck, alterations to level façade and windows, removal of cloak room and conversion to toilet, removal of balustrades and erection of new balustrades in different locations, demolition of internal walls, replacement of feature lighting and loss of all original flooring including parquetry timber flooring.</i></p>	<p>Again, the MO letter is making unsubstantiated claims about what was allegedly stated in the R&H report without making any specific references.</p> <p>As stated above, the R&H report discusses some of the changes in particular and the nature of architectural drawings and the construction process more generally (in R&H section 6.2)</p> <p>The R&H report is not premised on anything but documentary and physical evidence. Inspection of the BA drawings and of the house confirms that Woolley's "primary planning, form, spatial layout and flow all remained intact" and that the changes that were made were made to "secondary elements". It is important to distinguish the essence of the house as expressed in the planning, three-dimensional modelling of space and volumes (both external and internal), the flow of space through split levels and openings, the penetration of daylight and sunlight, and the major details that survived on-site changes during construction (the fireplace mass being the major example).</p> <p>Architectural quality is one of the key considerations in relation to the significance of the Eastment House. However, an analysis of the architectural essence of the Eastment House is totally missing in the Touring the Past assessment of the house as it concentrates on the changes to minor details to the fabric of the building.</p> <p>The MO letter has ignored the tabulation of the significant elements listed in Section 8.0 of the R&H report as well as the Management recommendations. These recommendations include the changing of elements in the house (such as the kitchen and bathrooms) which were listed amongst the divergences from the original Woolley design that could be upgraded to meet modern demands and/or current owner's tastes.</p>
<p>Un-numbered p. 2:</p> <p>a) Criterion (a) An item is important in the course or pattern of NSW's cultural or natural history</p> <p><i>o The Robertson Report concludes that 6 Springdale Rd shows evidence of significant activity and is associated with a significant activity or historical phase (being post WW2 subdivision of the grounds of large suburban houses).</i></p> <p><i>o The design of the Eastment House was initiated in 1970. The house itself was not built until 1977. The decade of the '70s occurred 25 years after the cessation of the Second World War. It is more historically accurate to describe the Eastment House as belonging to the late twentieth century period. Material shortages, which suggest austerity modes of design and construction that this substantial house does not reflect, are far more</i></p>	<p>The subdivision of larger estates into small collections of allotments reflects National Historical Theme: 4. Buildings, settlements, towns and cities, State Historical Theme: Towns, suburbs and villages.</p> <p>The period after WW2 was characterised by a series of economic booms and busts as well as the closer settlement of cities through the subdivision of larger estates. Whilst this process is not unique to any particular period of history, the economic decline of owners of large estates (through one, or a combination, of numerous causes such as financial difficulty, bankruptcy, death, distribution of greater</p>

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<p>associated with building projects of the late 1940s and early '50s.</p> <p><i>o The progressive break-up of larger estates and their intensive development in the municipality is a common/consistent theme across Ku-ring-gai's 20th-century history. The subject place does not exemplify or demonstrate this theme of the areas historical development with any greater clarity than a wide range of already included heritage items and conservation areas.</i></p>	<p>funds to beneficiaries, etc) does result in the subdivision of larger allotments into smaller allotments.</p> <p>It is correct to state that the period under consideration (ie the period of the 20th century after World War 2) was characterised by a series of serious and devastating economic recessions that severely affected the building industry, including the profession of architecture. Whilst the Eastment House was commissioned in 1970 its construction being completed in 1977 followed an extremely severe economic recession (1974-77) that saw many building companies fail and many architects leave the profession. The stripping out of details and changes of materials by the Eastments can be seen in this light as reflecting the economic austerity of this period and the need to reduce costs. Common bricks are a fraction of the price of face bricks.</p> <p>Therefore, it is correct to state that economic austerity was a relevant factor as it applied to a number of time periods in the 20th century after World War 2, not just the period of rationing and austerity immediately after the war.</p>
<p><i>o No evidence has been produced to suggest why the McKee family subdivided their large holding in the early 1960s, creating the subject allotment. Ascribing such a decision to 'economic downturns' is conjecture.</i></p>	<p>The reason for subdivision in 1961 after the McKee Family sold the property is not known.</p> <p>Further research could reveal the reason for the subdivision but the fact remains that the estate was subdivided in a period of economic recession lasting from 1959-1962.</p>
<p><i>o Every single-family residence constructed between the mid-19th century to date speaks to the pronounced cultural preference of Australians for a suburban lifestyle. The Eastment House is not of any historical note for being an example of a late 20th-century freestanding house situated in a suburban context.</i></p>	<p>As stated before, this reflects the National and State Historical Themes and is discussed in the R&H report but it is not included in the R&H Statement of Significance under Criterion (a).</p>
<p><i>o The application of 'brick only' covenants was widespread across 20th-century suburban landscapes. While it was intended to ensure quality houses, historians also recognise the exclusive class undertones of such covenants. In many cases, they were implemented to preserve a middle-class character for certain areas. The absence of any adequate comparative study of the influence, location or effect of 'brick only' areas on the built character municipality makes it difficult to accredit the Eastment House as being of any importance in this regard. It is one of imaginably thousands of detached brick houses built during the municipality's late 20th-century consolidation.</i></p>	<p>The condition from Ku-ring-gai Council regarding the treatment of the exterior woodwork on the house is relevant in that the two large and visually prominent timber roof-top rooms in the Eastment House were permitted to be constructed in timber rather than in brick (although, it should be noted that the south wall of the front roof-top room was originally intended to be constructed in brick).</p> <p>Brick covenants were a severe restriction on design creativity until they were overturned by the planning system's overhaul of planning controls.</p>
<p><i>o The requisite threshold for the Eastment House to meet as an individual heritage item, under Criterion (a), has not been reached.</i></p>	<p>No reason for reaching this conclusion is given in the MO letter.</p> <p>The R&H report gives succinct reasons for the inclusion of each of the criteria (Criterion (a)'s is given on R&H p.18).</p>

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<p>Un-numbered p. 3: Criterion (b) An item has strong or special association with the life or works of a person or group of persons</p> <p><i>o The Robertson Report claims a 'strong association' between the Eastment House and Mr Woolley. This connection—which to attain the threshold for Criterion (b) must be profound [R&H emphasis] or 'special'—has not been sufficiently established.</i></p> <p><i>The evidence does not paint a picture of Mr Woolley having been intimately involved in the design or completion of the Eastment House. Woolley's involvement was limited to the exterior of the house, his plans for which were diluted by the decision of Council to not approve the planned for porte cochere (which appears to have been intended as a defining feature of the façade) and also due to direction from the Eastment building company. The Eastment family were solely responsible for the design of the interior and the construction of the house.</i></p> <p><i>Mr Woolley was also not involved during construction. Mr Woolley is associated with thousands of buildings sites in New South Wales and further afield. Accordingly, for such a connection to be deemed of heritage significance, it should be more than tangential. The case that Mr Woolley's presence at the Eastment House is pronounced or that his constrained involvement in its composition had any meaningful impact on his career, views, or approach has simply not been made.</i></p>	<p>MO have misrepresented the wording of Criterion (b). The wording is "strong or special association". Nowhere in the NSW Heritage Manual is there mention of a "profound" association. This is true for assessment for items at a State level of significance as well as at a Local level.</p> <p>MO have misunderstood the process of architectural design in general and of designing within an architectural practice in particular. Moreover, the MO letter does not seek to acknowledge the passionate involvement of Ken Woolley in all of his designs. As stated in the Preamble to this report, Dr Robertson's interview of Ken Woolley regarding the contemporaneous Town Hall House revealed an architect passionate about the craft of architecture.</p> <p>It is an incredulous statement for MO to state that "Woolley's involvement was limited to the exterior of the house ...". This statement shows a complete lack of understanding of the architectural design process. The house is designed as a whole with the arrangement of the interior spaces and volumes (single height, double height, split level, etc) determining the exterior modulation and amassing of the building which, in turns feeds back into the interior arrangement so that both the interior spaces and the exterior massing are pleasing and satisfying.</p> <p>It is nonsense to state that Woolley designed the exterior and the Eastments designed the interior. This also relates to the involvement of the client in the design process. The client gives a brief of requirements to the architect in terms of accommodation, etc. and one assumes that the aesthetic treatment of that brief and its resolution into a house would have been Woolley's domain and that aesthetic resolution would have been agreeable to the Eastments as evidenced by them commissioning Woolley in the first instance and then by constructing the house he had designed.</p> <p>It is normal practice for clients to be involved in the selection of the interior finishes. This is not unusual. The involvement of the Eastments in such selections is not doubted and the change of documented materials is noted in the R&H report. Inspection of the 24 extant working drawings in the archives of Ancher, Mortlock, Murray & Woolley has revealed that the firm was involved in detailing the construction of the Eastment House and, moreover, detailing the Kitchen, Bathroom & Ensuite. The latter two drawings are dated 1975 which indicates a documented on-going</p>

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	<p>involvement of the firm in the Eastment House during its construction.</p> <p>Woolley's involvement with the Eastment House is not tangential because of his non-involvement on site as supervising architect. As stated in the R&H report of 16 April 2020 (on page 18 and at Appendix A) <u>the Eastment House was one of only a few individual houses undertaken by the firm in this period when large-scale projects were the norm for the practice</u>. Practices only undertake individual commissions for clients or for projects that are of potential interest to the architect. The fact that the Eastment House was designed by Woolley within the firm, was one of only two individual houses designed by the firm in 1970, and had 11 drawings allocated to it is an indication of the importance of the Eastment House to Woolley and, therefore, his association with the house is "strong".</p>
<p>Un-numbered p. 3: <i>o That Mr Woolley's planned formulation for the Eastment House, as articulated by the drawings of his office's draughtsman, were not wholly implemented, as acknowledged by the Robertson Report, is not an insignificant detail. The curtailment of the original plans further weakens the case that the Eastment House has a special/profound connection with Mr Woolley.</i></p>	<p>This matter is addressed fully elsewhere in this report and that such changes are not unusual but, rather, the norm in the architectural design process.</p>
<p>Un-numbered p. 3: <i>o That the Eastment family is of historical importance to the municipality has not been adequately established. Imaginably, there were other local families involved in the construction industry over the 20th century, including the latter part. Many of whom likely adopted the term 'Master Builders' (a common appellation for professional contractors, predominantly utilised in a promotional sense) and were responsible for 'quality work' and 'honesty', qualities which the Robertson Report assigns to Barry Eastment on the basis of an obituary prepared by a colleague. The relevance of the Eastment family wishing to live within 'an existing suburban area' (i.e. Killara) appears immaterial to an assessment of associational significance.</i></p>	<p>The obituary was not written by a "colleague" but by an architect, Mr John James, for whom the Eastments constructed the Readers Digest Building in Surry Hills.</p> <p>The fact that a number of Eastment family members, involved in the industry, lived in Killara is an indication of their long-term association with the area.</p>
<p>Un-numbered p. 3: <i>o The requisite threshold for the Eastment House to meet as an individual heritage item, under Criterion (b), has not been reached.</i></p>	<p>No reason for reaching this conclusion is given in the MO letter.</p> <p>The R&H report gives succinct reasons for the inclusion of each of the criteria (Criterion (b)'s is given on R&H p.18).</p>
<p>Un-numbered p. 3: Criterion (c) An item is important in demonstration aesthetic characteristics and/or a high degree of creative or technical achievement.</p> <p><i>o Planning qualities attributed to the Eastment House (separating spaces on the basis of function, split-level, clerestory windows, solar orientation, long corridor, air</i></p>	<p>MO have misrepresented Criterion (c). The planning of the building with its clear and logical separation of functions, the use of the double-height</p>

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<p>flow, openness etc.) were not innovative or unusual by the 1970s.</p>	<p>gallery, the use of the subtle cross-fall of the site to introduce a split level (with its consequent spatial interest, visual flow, etc) are handles, in this writer's opinion (informed by over 40 years of architectural practice and experience of other architects' works of different periods ranging from the 1830s to the present), does demonstrate a mastery of architecture and warrants recognition of Woolley's high degree of creative achievement.</p>
<p>Un-numbered p. 3: <i>o That the design of the Eastment House 'merged' with the topography of the subject allotment—formerly part of 4 Springdale Road's lawn with a slight drop in land level—in a symbiotic' relationship has not been substantiated.</i></p>	<p>The R&H report was clear in stating that the house utilised its difficult site that was constrained by boundaries that were not parallel, a pre-existing tennis court and setback from Springdale Road to respond to the topography of the site. The site slopes from the street down to the pre-existing tennis court and it also slopes across the site from south down to the north. It is this cross-fall that Woolley recognised opened up possibilities for the spatial disposition of rooms that could add interior interest as well as afford vistas across the lower spaces out to the garden.</p> <p>In other words it relates to its site sympathetically.</p>
<p>Un-numbered p. 3: <i>o The so-called 'Sydney School' style of architecture (which is a far from accepted idiom that is critiqued by numerous architectural historians) is acutely associated with bushland contexts and settings, not inter-war period suburban streetscapes.</i></p> <p><i>As stated within the heritage report prepared by Touring the Past dated 6 March 2020: 'Particularly telling in this respect is that the split-level nature of the house (hardly pronounced—compared to the Johnson House or Woolley House I) is perpendicular to the slight fall of the subject land. Its siting then is opposed to the remnant natural quality of the topography and not responsive to it at all. Simply, a mid-1970s infill house was situated between the retained tennis court and established suburban street.'</i></p>	<p>MO do not acknowledge that the buildings of the so-called Sydney School (a term which Woolley vehemently rejected for his work and which I prefer to label as Regional Modernism – see R&H report page 20) were predominantly built on suburban blocks.</p> <p>The State Heritage Register-listed Woolley House I is constructed on a similar suburban allotment. On its south side is a large Federation house and close by on its north side is an interwar bungalow. The iconic David Moore photographs of the Woolley House I in a treed bushland setting were taken from the tennis court of the Federation house. Most of the trees in the photographs were located on the two neighbouring blocks of land.</p> <p>This statement is not correct. As stated above (and in the R&H report of 16 April), the Eastment House site falls in two directions, from the street down to the tennis court and across the site from the south down to the north. The fall across the site is less pronounced than the fall down the length of the site. Woolley took advantage of both these falls to create spatial interest within the house and to accommodate a room at the lower level opening onto the tennis court.</p> <p>The Johnson House at Chatswood is organised around the central timber staircase, with each functional area located at half-floor intervals to the north and south of the stair.</p> <p>The Woolley House I at Mosman is arranged on a series of platforms that step down and across the site, as the site there also falls in two directions. The</p>

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	<p>difference in platform floor levels was half-a-floor and the plan was staggered because of the steeply tapering shape of the triangular site. There is no upper level above the platforms.</p> <p>The level difference in the split of the Eastment house is one-third/two-thirds. This permits a person standing on the upper level of the split to look under the floor of the mezzanine study without bending over; a very subtle manipulation of the land-fall to obtain a visual and spatial flow within the house.</p>
<p>Un-numbered p. 4: <i>o The conclusion reached in the Robertson Report that the Eastment House is 'visually recessive' within the Springdale Streetscape is contestable. The relationship formed by its angular/geometric form, mass of uniform common brown brick, brown tiling, brown paint, small setback, large garage door, and lack of fence with surrounding inter-war buildings is stark. This is not a design that fades into the background.</i></p>	<p>We are not sure why our statement: "The palette of unpainted, predominantly brown, brick, Mission Brown coloured timberwork and dark brown roof tiles causes the house to be visually recessive ..." (R&H page 19) is "contestable". The fact is that dark colours are more recessive than light colours.</p> <p>The combination of the house's colours, materials and the front boundary trees do screen the house. It is not something that is noticed without deliberately looking for it.</p>
<p>Un-numbered p. 4: <i>o The Robertson Report does not make plain what the 'hallmarks' of the architectural design mode the subject place is associated with (variously described as the 'so-called Sydney School' and a 'regional form of modernism', both of which are nebulous conceptions). Unpainted external brickwork, weatherboard, clerestory windows, 'complex, broken roof forms' (noting that we contest the description of the roof form as 'complex'), and split-level were all—by the 1970s—too common/conventional across the housing industry to provide any level of distinctiveness for the subject place.</i></p>	<p>The MO out-of-hand dismissal of accepted architectural terms such as "The Sydney School" and "Regional Modernism" as being "nebulous" indicates a lack of understanding. The accepted reference to Australian architectural styles Apperley, Irving & Reynolds' 1999 book, <i>Identifying Australian Architecture</i>, uses "Sydney School" and "Sydney Regionalism" (as well as "Melbourne Regionalism" and "Perth Regionalism" etc for other capital cities' version of regional modernism). "Regional Modernism" is an internationally accepted architectural term whose current meaning was coined by Kenneth Frampton in his 1983 essay <i>Towards a Critical Regionalism: Six Points for an Architecture of Resistance</i>.</p> <p>MO are dismissing the "architectural essence" of the house by reducing it to its constituent materials and finishes and ignoring the mastery of space and light.</p>
<p>Un-numbered p. 4: <i>o The Robertson Report assertion that the palette of the Eastment House, which it acknowledges was downgraded from the intended employment of face brick to an economical common brick, demonstrates the approach of the firm Archer, Mortlock, Murray & Woolley is questionable.</i></p> <p><i>Again, the employment of brown brick in the late 20th-century Sydney/Ku-ring-gai suburbia is not uncommon.</i></p> <p><i>Mr Woolley is also frequently associated with the designs of painted brick and other softer external colour palettes, including a lot of his individual one-off house designs (i.e. not for volume Building clients), such as his own houses in Paddington and Palm Beach.</i></p>	<p>MO are, again, misrepresenting the R&H report. The R&H report never stated that the "palette of the Eastment House ... was downgraded". The R&H report acknowledges that the exterior brickwork was changed and that other changes occurred to the house. "Changed" but not "downgraded". The colour palette, however, remained as broadly intended.</p> <p>A sweeping statement without acknowledgement of how the material was used in each instance.</p> <p>Of course Woolley is associated with the design of the Pettit & Sevitt project homes which primarily were bagged and painted white with dark stained timberwork. As stated elsewhere, face bricks are expensive compared to commons and Woolley</p>

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<p><i>The submission that the Eastment illustrates the firm's 'construction method' is inaccurate. The Eastment's were solely responsible for the erection of the residence.</i></p>	<p>devised a system of using cheap bricks bagged and painted to enable the houses to be mass produced and affordable. Face bricks were not only expensive, they were often in short supply and, in order to obtain a consistency in a mass-produced product, face bricks were not used.</p> <p>It should be noted that the Palm Beach was not originally painted. Subsequent owners have unsympathetically changed the original aesthetics of the house by painting the stained timberwork.</p> <p>Again, MO are misrepresenting the R&H report. What the R&H report stated on page 22 was: "The surviving architectural drawings and the completed Eastment House demonstrate the palette of materials and construction methods employed by the architectural firm of Ancher, Mortlock, Murray and Woolley that are recognised as forming a distinct regional variation of modern architecture."</p> <p>The drawings, and especially the annotations in pencil, indicate the normal interaction between builder and architect regarding the construction method for the house.</p> <p>Moreover, the numerous drawings produced by the AMMW office indicate an on-going and continuing relationship between the Eastments and Woolley during the house's construction. Within t in the archives of Ancher, Mortlock, Murray & Woolley there are the following:</p> <p>5 large-scale cross sections showing the construction of the building (drawing No 04 and four unnumbered drawings of Section 2, 3, 4 & 5), 6 sheets of numerous construction details (drawings, 06A, 07A, 08A, 09A, 10A & 11A), An undated set-out section giving the builder heights of the building elements so they can be set out and constructed, A 1975 sheet of details regarding the fireplace and chimney construction, An undated plan of floor relative Levels used to set out the house, An undated plan showing the floor structure, An undated plan showing the roof structure, and An undated sheet showing large-scale sections and details of the stairs.</p> <p>In addition to these construction drawings there are three sheets of Kitchen, Bathroom and Ensuite details.</p>
<p>Un-numbered p. 4: <i>o The fireplace is a notable internal element. However, without an adequate comparative study of others of its type, the suggestion that it is anything other than a typical 1970s brick/concrete fireplace is not reasonably makeable.</i></p>	<p>As stated in the Preamble to this report, Dr Robertson has had considerable experience in over 40 years as a practising architect. He has visited hundreds of buildings in Australia and overseas and has never encountered a fireplace design like the one in the Eastment House.</p>

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	<p>Dr Robertson contends that it is not a “typical 1970s brick/concrete fireplace” and MO have not produced any evidence or professional experience to justify that statement.</p> <p>The detailed drawings of the fireplace and chimney indicate its unusual nature in that it is detailed (rather than being a standard element that did not require detailing).</p>
<p>Un-numbered p. 4: <i>o The Robertson Report does not make plain what the 'key hallmarks' of Mr Woolley's approach were or why the Eastment House, compared to the many other residential designs he was involved with, is exemplary.</i></p>	<p>The R&H report on page 16 clearly states in the last paragraph of Section 6.1 the characteristics of this period of Woolley's house designs (of which the Eastment House was the culmination), the characteristic of his other houses of that period and the changing characteristics of his later houses for himself.</p>
<p>Un-numbered p. 4: <i>o The Eastment House was not the recipient of any architectural award or subject to any contemporary architectural coverage, both elements that characterise many of Mr Woolley's designs. It has also never, to our knowledge, featured in any publication concerning the practice of Mr Woolley or general expositions on late 20th century architecture.</i></p>	<p>Many architects have significant projects that are not published. Their non-publication could be for one of any number of different reasons including: Clients not wanting their house publicised, or Architects not wanting to be known to be undertaking such work (eg a firm undertaking large commercial, governmental or other projects might not want to be known as designers of single houses), etc.</p>
<p>Un-numbered p. 4: <i>o That there is a dedicated number of passionate individuals in the current era captivated by the work of Mr Woolley means little to an assessment of the Eastment House's aesthetic significance.</i></p>	<p>This misrepresents the R&H report. The R&H report does not cite “passionate individuals” or “captivated” anywhere in the report. On page 20 of the R&H report under Criterion (d): “The work of Woolley has a strong following within the architectural community of NSW as evidenced by the publications and exhibitions on the firm's work.”</p> <p>It is inaccurate of MO to suggest that the interest in the firm's work by the Art Gallery of NSW, the Australian Institute of Architects and Docomomo Australia means little to the esteem with which the firm's work is held by educated people in the visual arts field.</p>
<p>Un-numbered p. 4: <i>o That the Eastment House illustrates or was the inspiration for a sufficiently high degree 'creative or technical innovation or achievement' for an individual heritage item, as required by Criterion (c) has not been demonstrated.</i></p>	<p>No reason for reaching this conclusion is given in the MO letter.</p> <p>The R&H report gives succinct reasons for the inclusion of each of the criteria (Criterion (c)'s is given on R&H p.20).</p>
<p>Un-numbered p. 4: Criterion (d) An item has strong or special associations with a particular community or cultural group in NSW (or the local area) for social, cultural or spiritual reasons. <i>o The Robertson Report does not provide details of an identifiable concrete group who have formed a special</i></p>	<p>This misrepresents the R&H report.</p>

Mills & Oakley letter dated 20 May 2020	Robertson & Hindmarsh Pty Ltd comment
<p><i>attachment to the Eastment House prior to the decision of the real estate agent to highlight Mr Woolley's involvement in the design of the place in an effort to boost interest during the 2019 sale.</i></p>	<p>On page 20 of the R&H report under Criterion (d): "The work of Woolley has a strong following within the architectural community of NSW as evidenced by the publications and exhibitions on the firm's work."</p> <p>The architectural community of NSW is a definable group under this criterion. Moreover, the cultural group could easily be expanded to Australia given Ken Woolley's awards by the profession (in 1993) and the Australian community through the Federal Government (in 1988).</p>
<p>Un-numbered p. 4: <i>o Proving that such a group is definable (who belongs to the 'architectural community of NSW') and has an important association with the item—the conditions which must be met in claiming Criterion (d)—would not appear likely.</i></p>	<p>No reason for reaching this conclusion is given in the MO letter.</p> <p>The R&H report gives succinct reasons for the inclusion of each of the criteria (Criterion (d)'s is given in the R&H report on p.20 in the discussion on this criterion).</p>
<p>Un-numbered p. 4: e) 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).</p> <p><i>o That the Eastment House performed as a design 'trial' for project homes he prepared for Pettit & Sevitt (which had been designing since 1962, several years prior to the Eastment House) has not been satisfactorily proven.</i></p>	<p>This misrepresents the R&H report. On R&H report page 21 it is stated that: "... the architect was trialling for his work on the project homes designed for Pettit & Sevitt." The use of the past continuous tense was deliberate as the designs of the Pettit & Sevitt houses evolved over the years.</p> <p>Architectural historians recognise the consistency of Woolley's work and development of details, as stated on R&H page 15.</p>
<p>Un-numbered p. 5: <i>o The appearance of an architect-designed exterior in the suburbs in 1970s Ku-ring-ai is not in itself remarkably, historically or otherwise. Between 1962 and 1977, some 3,5000 project homes designed by Mr Woolley were constructed in Australia, predominantly in New South Wales. The presence of his designs is hardly infrequent.</i></p>	<p>The appearance of the Eastment House in Springdale Road was remarkable as urban infill in an established suburb of earlier houses. It was unlike any of the other Springdale Road houses that were visible from the street. Other houses in established areas of Ku-ring-gai, such as houses by Harry Seidler or Russell Jack were usually located on battle-axe sites and were not visible from the public realm.</p> <p>Many of the "project homes", constructed by Pettit & Sevitt for instance, were based on a small number of prototypes that were designed by notable architects such as Ken Woolley. A key example of this is the <i>Low Line B</i> in St Ives, which is listed as a local heritage item on Schedule 5 of the Ku-ring-gai LEP along with the other Pettit & Sevitt Group Project Homes in Richmond Avenue (items I728-I732 & I734) and as recognised on the RAI Register of Significant 20th Century buildings.</p> <p>The presence of Woolley's one-off houses for individual clients was, indeed, infrequent. Refer to the</p>

Mills & Oakley letter dated 20 May 2020	Robertson & Hindmarsh Pty Ltd comment
<p>Un-numbered p. 5: <i>o Margaret Eastment recalls her husband Barry, who knew Mr Woolley, engaged him on the basis of a 'favour'. This likely indicates that Barry, a professional builder intended to always design/construct his own house and sought the assistance of an architect he knew personally in 'signing off' on the plans. This was a matter of convenience. The Eastments did not engage Mr Woolley or his firm because they sought to make an architectural statement or develop a ground-breaking design</i></p>	<p>list of the firm's houses for individual client in Appendix A of the R&H report of 16 April 2020.</p> <p>This statement by MO is not only conjecture but is preposterous.</p> <p>Nowhere in the two letters by Mrs Eastment are any of these claims supported.</p> <p>I know that Ken Woolley and his fellow partners would have been appalled and outraged at the imputation that the house was designed by Mr Eastment and that Woolley merely "signed the plans off". He was an architect of integrity and was totally involved in the design of his projects.</p> <p>Mrs Eastment's letters clearly state that Woolley "was engaged to prepare concept and detailed design plans and specifications suitable for Building Approval for our home." This contradicts the conjectural statement by MO. Moreover, none of the written documentation produced to date indicates that the Eastments engaged Woolley to not "make an architectural statement or develop a ground-breaking design" as stated by MO. The documents produced indicate that Woolley was engaged to design the house and prepare "detailed design plans". The Eastments would have known the type of house that Woolley would design and would have agreed with the design approach, otherwise they would have engaged another architect or, if Mr Eastment did, in fact, design the house he could have employed a draughtsperson to draw the plans as the use of an architect was (and is) not compulsory.</p> <p>As stated previously in this report, the 24 extant working drawings in the AMMW archives indicate the house was thoroughly detailed by the architect and was not the creation of Mr Eastment that was merely signed off by the architect.</p>
<p>Un-numbered p. 5: <i>o The requisite threshold for the Eastment House to meet as an individual heritage item, under Criterion (e), has not been reached.</i></p>	<p>No reason for reaching this conclusion is given in the MO letter.</p> <p>The R&H report gives succinct reasons for the inclusion of each of the criteria (Criterion (f)'s is given on R&H report p.21).</p>
<p>Un-numbered p. 5: f) Criterion (g) item is important in demonstrating the principle characteristics of a class of the local area's cultural or natural places:</p> <p><i>o Claiming aesthetic and rarity significance (i.e. the place is of 'exceptional interest' and outstanding design merit) would seem to be undercut by pursuing Criterion (g), or vice a versa. It is difficult to reconcile how a potential heritage item can be both unrivalled/special and also broadly representative of a designer's approach.</i></p>	<p>This statement is not correct.</p> <p>A building can be of exceptional interest in its own right and can be representative of an architect's oeuvre. R&H report page 22 states " The Eastment House ... demonstrates the firm's use of similar details in houses at the upper end of the real estate</p>

Mills & Oakley letter dated 20 May 2020	Robertson & Hindmarsh Pty Ltd comment
	market as were then modified and used in the firm's work for the project home market."
<p><i>o The link between the Eastment House and Mr Woolley's design work on project homes has not been clearly established.</i></p>	<p>No reason for reaching this conclusion is given in the MO letter.</p> <p>The R&H report gives succinct reasons for the inclusion of each of the criteria (Criterion (g)'s is given on R&H report p.22 in the discussion).</p>
<p>Un-numbered p. 5:</p> <p>Evidence from Original Owner <i>The Robertson Report contains a number of factual errors regarding the original design and Woolley's involvement. This is confirmed in a document signed by Mrs Eastment, who for clarity was the original owner, original client and original builder. Mrs Eastment was intimately involved in the design and construction of the home and her evidence should be given significant weight. Please see the attached letter (subsequent to previous letters) and detail file notes from two recent phone calls between Mrs Eastment and Mr Leahy confirming Mrs Eastment's view. In summary, Mrs Eastment's comments include the following:</i></p>	<p>For clarity's sake, Mrs Eastment's letter of 20 March 2020 does not confirm that the Robertson Report contains a number of factual errors. This is a misrepresentation.</p> <p>Mrs Eastment's second letter of 19 May 2020 also does not mention, or refer to, the R&H report of 16 April 2020.</p>
<p>Un-numbered p. 5:</p> <p><i>a) There is no connection between the existing brown roof tiles, mission-brown timber and common bricks. To say it was Mr Woolley's aesthetic desire and design intent is factually incorrect.</i></p>	<p>The MO letter misrepresents what the R&H report of 16 April stated.</p> <p>On page 15 of the R&H report we quote an excerpt from a catalogue of the exhibition at the Art Gallery of NSW which refers to "Some of the individual houses and most of the project houses shared brown bricks, brown tiles and particular sharp-pointed forms". (Saunders & Burke, p.6)</p> <p>On page 17 of the R&H report we state: "On the exterior, the change from face bricks to unpainted select commons maintained the original aesthetic desired by Woolley and the Mission Brown windows and brown roof tiles continued that aesthetic." It is a statement of fact that unpainted brown common bricks maintained the aesthetic of unpainted face bricks. Brown coloured exterior woodwork, regardless of who made the final colour selection, is also within Ken Woolley's colour palette for houses of that period.</p> <p>On page 19 of the R&H report we again acknowledge the substitution of common bricks for the specified face bricks. We also state how this achieves what Woolley intended for the exterior of the house in terms of a recessive colour palette.</p> <p>It is not incorrect to state that face bricks and brown stained/painted exterior woodwork was desired by Woolley at that time as they were common finishes for the few houses that the firm undertook for individual clients.</p>

Mills & Oakley letter dated 20 May 2020	Robertson & Hindmarsh Pty Ltd comment
<p>Un-numbered p. 5: <i>b) The common brick façade was chosen by the Eastment's at the time because it was cheaper to build. The Eastment's always intended to paint the bricks white.</i></p>	<p>Our previous comments that the house was constructed at the end of a very severe economic recession are relevant here, with regard to the change of materials in order to reduce costs.</p> <p>In addition, whilst I do not doubt Mrs Eastment's statement that their intention was to paint the house white, it never was painted and we must assess this against the original architect's design intent to have the house clad in face bricks (ie unpainted bricks).</p>
<p>Un-numbered p. 5: <i>c) The street fence was designed and approved and to build in-line with the height of the neighbouring properties.</i></p>	<p>We do not deny that the fence was and the porte-cochere were designed by Woolley to be constructed. However, the porte cochere was refused by Council and the front fence was never built.</p> <p>Again, the existing situation is that the house, which is within a Heritage Conservation Area, does not have a front fence and has not had a front fence since the date of the house's construction.</p>
<p>Un-numbered p. 5: <i>d) Mrs Eastment's view is that the design of the house was not significant to Mr Woolley &/or his firm. Mrs Eastment notes that Mr Woolley took the initial job and was partially involved as a "favour" as a "mate" of Mr Eastment. Whilst Mrs Eastment obviously enjoyed her house, in her view the design of the house was predominantly dictated by the Eastment building company and is in no way close to Mr Woolley's best work.</i></p>	<p>The MO letter is twisting the actual wording of Mrs Eastment's letter dated 19 May 2020 which states: "My husband was the managing director of a construction and joinery company FT Eastment & Sons. He knew Mr Woolley through their association in the construction industry. It was through this connection that Mr Woolley was engaged to prepare concept and detailed design plans and specifications suitable for Building Approval for our home. We did not engage Mr Woolley for site supervision services and he did not attend the site during the construction phase. We had our own project manager and my husband supervised construction on a daily basis."</p> <p>There is no mention in any written documentation presented by Mrs Eastment of the house being designed by Woolley as a "favour" as a "mate". Mrs Eastment clearly states that Woolley was "engaged to prepare concept and detailed design plans and specifications suitable for Building Approval". This is a formal arrangement that every architect understands as a commission to design the house.</p> <p>The R&H report did state (at page 23 and at Appendix A on p.36) that, as so few houses were undertaken by the firm at that time, because the firm primarily undertook large commercial and education commissions, each house that was designed was considered to be a major commission. To downplay the importance of the house to the firm is not correct.</p> <p>What is the basis for the MO statement that the house "is in no way close to Mr Woolley's best work"? Where is the comparative analysis? Where are the better houses within the Ku-ring-gai Local Government Area? The MO statement is simply an unsubstantiated personal opinion.</p>

Mills & Oakley letter dated 20 May 2020	Robertson & Hindmarsh Pty Ltd comment
	<p>At no time has the R&H report of 16 April 2020 stated that the Eastment House is Woolley's best work. What we have stated is that the house is a significant house at a Local level within the context of the Ku-ring-gai Local Government Area.</p>
<p>Un-numbered p. 5: <i>e) Mrs Eastment disagrees with the statement in the Robertson Report that the commissioning of Mr Woolley (or the firm) by the Eastment family demonstrates a design of exceptional interest as it embodies the Client's brief.</i></p>	<p>The MO letter is again twisting the actual words of the R&H report.</p> <p>On page 21 of the R&H report we state: "As a house commissioned by an individual client it demonstrates a design of exceptional interest as it embodies the client's brief to the architect whilst also embodying design elements that the architect was trialling for his work on the project homes designed for Pettit & Sevitt." As stated previously, Ken Woolley's firm was undertaking large-scale projects and so individual houses for individual clients is of interest and importance within the architect's oeuvre. Our statement reflects this duality of the architect's work, ie accepting individual briefs from clients for a large house whilst also undertaking mass housing for the middle class through his project homes. On the one hand a brief for individual requirements and on the other, designs without an individual brief.</p>
<p>Un-numbered p. 5: <i>f) The exterior materials and colour palette were chosen by Mr and Mrs Eastment, not Mr Woolley.</i></p>	<p>This is not contradicted by the R&H report. The palette of materials chosen by the Eastments reflected those detailed by the architect (ie unpainted bricks and stained/painted timber).</p>
<p>Un-numbered p. 5: <i>g) The interior of the property was fully designed by the owners and not Mr Woolley. Mr Woolley was not involved in selecting any finishes, colour palettes, products or interior design elements.</i></p>	<p>The MO letter ignores the importance of the architect's contribution to the design of the house. At the top of page 17 in our report we clearly discuss the primary importance of the design of the house undertaken by Woolley: "...the primary planning, form, spatial layout and flow all remained intact. The major design elements of the front entry, the double-height clerestory-lit Gallery (corridor), the split level Living/Dining/Sunroom areas and the double chimneyed fireplaces all remained intact in the final built building." The architecture of the Eastment House is undoubtedly Ken Woolley's. On the same page of our report we acknowledge the changes made during construction (with regard to materials and finishes, etc) but none of these changes alter the essential architectural creation of the house by Woolley.</p>
<p>Un-numbered p. 6: <i>h) Mrs Eastment has expressed deep concern at Council's actions, it's unfounded consultant report that dismisses her in depth involvement in the project, Mr Eastment personal relationship with Mr Woolley and the way that her property was accessed without her consent during an open house inspection.</i></p>	<p>At no point in either of Mrs Eastment's two letters does she "express deep concern at Council's actions, it's unfounded consultant report that dismisses her in depth involvement ..."</p> <p>Perhaps MO could be specific as to where the R&H report is "unfounded".</p>

Mills & Oakley letter dated 20 May 2020	Robertson & Hindmarsh Pty Ltd comment
<p data-bbox="193 237 794 271">Un-numbered p. 6:</p> <p data-bbox="193 271 794 304">Original DA Approved Plans & Conditions:</p> <p data-bbox="193 304 794 495"><i>It should be noted that Mrs Eastment provided what appears to be the only existing and original DA approved plans and stamped conditions to the new owners to assist them in carrying out any appropriate renovations as discussed at the time of purchase. The DA plans and conditions clearly demonstrate a number of key items that also contradict The Robertson Report:</i></p> <ul data-bbox="256 741 794 1010" style="list-style-type: none"> <li data-bbox="256 741 794 887">• <i>External Timber Colour: If the weatherboards are not western red cedar or Canadian redwood, treated with a heavy body stain, they are to be painted with a pigmented paint and not oiled, stained, varnished or similarly treated.</i> <li data-bbox="256 920 794 1010">• <i>Street Fence: The height of the brick street fence on the front boundary is not to exceed 6'0" above footpath level.</i> <p data-bbox="193 1043 794 1189"><i>There is no notation &/or condition anywhere in the original documentation provided by Mrs Eastment that specifies any particular external &/or internal colouring, other than the previous condition of Consent above, being a heavy natural stain &/or any pigment paint.</i></p>	<p data-bbox="802 282 1399 495">Conrad Gargett Architects, the successor firm to Ancher, Mortlock & Woolley were contacted on 3 April 2020 by R&H regarding accessing the complete set of extant drawings for the Eastment House. The extant drawings have now been made available (4 April 2020) to R&H and they comprise a set of 24 drawings.</p> <p data-bbox="802 528 1399 707">The statement by MO that the following points contradict the R&H report is unclear. It is arguable that the BA drawings contradict what is stated in the R&H report. [Please note that the approved drawings are BA drawings and not DA drawings as DAs were not required at that time].</p> <p data-bbox="802 741 1399 1458">The BA notation regarding treatment of the external woodwork refers to the protection of the timberwork from rot as well as for aesthetic reasons. Western Red Cedar (WRC) and Canadian Redwood are considered to be durable timbers that do not require a paint film for protection and they were usually stained (with Cabot's or similar stains) for aesthetic reasons (ie no raw timber). The range of colours in the 1970s comprised various shades of brown and black; Mission Brown being the most common. The reference to timbers other than WRC or Redwood having to be painted with a pigmented paint has a two-fold meaning. Firstly, other timbers require protection because they are less durable. Oils and stains do not provide the same level of protection as "pigmented paint" (ie an oil-based paint as plastic-based paints were not then readily available for use on timber). The prohibition on varnish is interesting in that varnishes would provide adequate protection (for approximately 12 months before requiring renewal) but, because varnish is a clear finish the natural colour and grain of the timber would be visible. So, the intention of BA condition 4 was primarily an aesthetic condition.</p> <p data-bbox="802 1491 1399 1615">Regarding the front fence, the R&H report states clearly in Section 8.1 (R&H p. 26) that the fence was approved but never constructed. This is not a contradiction of the BA drawings.</p> <p data-bbox="802 1648 1399 1749">The MO letter makes such generalised statements that the R&H report errs in its facts and yet the MO letter fails to pinpoint the precise location of such errors, primarily because they do not exist.</p>

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APPENDIX I

List of extant working drawings in the archives of Ancher, Mortlock Murray & Woolley.

Numbered drawings:

7017-01	Eastment House, 6 Springdale Road, Killara	Plan Level 1
7017-02	Eastment House, 6 Springdale Road, Killara	Plan Level 2
7017-03	Eastment House, 6 Springdale Road, Killara	Plan Level 3
7017-04	Eastment House, 6 Springdale Road, Killara	Section
7017-05	Eastment House, 6 Springdale Road, Killara	Elevations
7017-06A	Eastment House, [un-named but depicting large-scale roof details]	
7017-07A	Eastment House, [un-named but depicting large-scale roof details]	
7017-08A	Eastment House, [un-named but depicting large-scale roof details]	
7017-09A	Eastment House, [un-named but depicting large-scale roof details]	
7017-10A	Eastment House, [un-named but depicting large-scale construction details]	
7017-11A	Eastment House, [un-named but depicting large-scale construction details]	

Un-numbered drawings:

7017	Eastment House, Section 2-2	
7017	Eastment House, Section 3-3	
7017	Eastment House, Section 4-4	
7017	Eastment House, Section 5-5	
7017	Eastment House, Stair Details	
7017	Eastment House, Set-Out Section	
7017	Eastment House, [un-named but depicting Ground Floor set-out plan]	
7017	Eastment House, [un-named but depicting Basement floor structure]	
7017	Eastment House, Roof Framing Plan	
7017	Eastment House, 6 Springdale Road, Killara	Fireplace and Chimney Details, 20.5.1975
7017	Eastment House, 6 Springdale Road, Killara	Kitchen & Laundry Layout
7017	Eastment House, 6 Springdale Road, Killara	Bathroom, 10.10.1975
7017	Eastment House, 6 Springdale Road, Killara	Ensuite, 10.10.1975