

Pymble Ladies College – Grey House Precinct SSDA Application

HERITAGE IMPACT STATEMENT – ADDENDUM

The State Significant Development Application (SSDA) for the Pymble Ladies' College Grey House Precinct is currently under assessment by the NSW Department of Planning, Industry and Environment (DPIE). The site is not identified as an item of local heritage significance, however, is in the vicinity of the Pymble Avenue heritage conservation area and a number of individually listed items, all of which are included in Schedule 5 of the *Ku ring gai Local Environmental Plan 2015*. For this reason, a Heritage Impact Statement (HIS) was prepared as part of the application submission package.

It is common practice by the DPIE to submit any part of an application to peer review to ensure that the position and conclusions upon which a proposal is based are sound.

A peer review of the HIS was undertaken by GML with the following recommendations (Section 4.2) being made:

As set out in section 4.1 above, the findings of this peer review report are that the proposed development will not result in any substantive impacts on the heritage significance of the Pymble Avenue HCA, the individually listed heritage items within its boundaries, or the (unlisted) significant buildings and specs within the broader PLC complex.

In terms of potential heritage impacts, therefore, there would be no objection to the SSDA being approved. Moreover, given the findings of the peer review, there would be no requirement to impose consent conditions to avoid or mitigate any impacts on heritage significance.

Response to GML Commentary:

The peer review has addressed individual sections of the HIS and the following commentary addresses those comments where relevant.

1.5 Secretary's Environmental Assessment terms of reference.

No response required.

1.6 Statutory and heritage context

No response required.

2.1 Historical Context.

The inclusion of a detailed historical development of the early 20th century subdivision pattern, whilst of interest in the development of the conservation area, is not in our opinion germane to understanding the potential impacts from the proposed development, and as such is not included.

2.2 Site description and setting.

The detailed description of buildings in the vicinity of the site discussed in the GML commentary would add to a deeper understanding of the character of the conservation area, however the statement of significance for the Pymble Avenue Conservation area provides the key information against which the heritage impact of the development is assessed.

The Statement of Significance is included in section 4.2 of the HIS.

2.3 Views.

A separate detailed Visual Impact Analysis Report (VIAR) in parallel to the HIS. This report, prepared by Geoscapes, constitutes a thorough analysis of the potential visual impacts of the proposal. The views identified and discussed in section 3.3 of the HIS does identify the primary and partial views that affect the proposal in sufficient detail to enable the assessment of heritage impacts.

Confirmation: NBRS did not have access to private properties.

2.4 Heritage significance

The GML commentary notes that where the NSW Heritage Inventory listing does not contain a Statement of Significance for an item in the vicinity individual assessments of heritage significance should have been carried out for each property.

We disagree with this comment as the proper process of assessing the significance of a place involves a detailed physical and documentary research process culminating in an assessment against the criteria set out by Heritage NSW. As the impact being assessed is a visual one, a deeper historical and physical appreciation of the place would not have altered our ability to reach an appropriate conclusion as to the potential heritage impact of the proposal.

3.1 Impact on heritage items in the vicinity

The commentary contained in the peer review supports the conclusions contained in the VIAR prepared by Geoscapes, as well as the statements regarding the potential view impacts on items in the vicinity by NBRS, that there are no visual impacts upon the heritage items and Pymble Avenue Conservation Area.

It is noted that the peer review feels that additional graphic evidence would have been useful.

3.3 Compliance with controls and guidelines.

The peer review notes that this section of the report does address the issues as an overview, as the issues are dealt with in more detail earlier in the report. This approach avoids repeating detailed discussion of issues.

Regarding commentary that suggests that further detailed heritage assessment of nearby heritage items is required, we disagree, for the following reason:

- Undertaking a detailed a heritage assessment (physical and documentary research, detailed analysis and assessment against the standard heritage criteria) for each item in the vicinity of the site would not alter the significance of the place established by its being listed as an item of heritage significance Schedule 5 of the *Ku ring gai LEP 2015*. This significance, though not expressed in a statement of significance, has been taken into consideration in assessing the potential view impacts on the item from the proposed development.

The peer review includes the following commentary, page 15, stating that the report in some respects contains 'fundamental flaws and omissions' and that the report is 'not compliant' to the key guidelines used to prepare Heritage Impact Statements.

However, despite the validity of the findings of the HIS, the report itself has a number of fundamental flaws and omissions. As pointed out in Sections 2.1, 2.2, 2.3 and 2.4 of this peer review report, the research and analysis utilised to formulate these conclusions is in some respects (especially the historical and physical analysis, and the assessment of heritage significance) inadequate and not compliant with that required by the guideline Statements of Heritage Impact, and by other widely utilised and accepted guidelines such as the Burra Charter.

To this opinion we would make the following clarifications:

- Regarding the adequacy of the historical and physical analysis:
NBRS have prepared a history of the site and the surrounding Pymble area (Section 2.0) to a level of detail which allows the reader to understand the history of the development site sufficient to understand the context of the development. Section 3.0 of the report describes through words and images the physical character of the subject area of campus and neighbouring conservation area.

The historical and physical analysis has been prepared in line with the Heritage NSW Heritage Manual publication *Assessing Heritage Significance* (<https://www.heritage.nsw.gov.au/assets/Uploads/a-z-publications/a-c/Assessing-Heritage-Significance.pdf>).

- Regarding the adequacy of the assessment of heritage significance:

As noted elsewhere in this addendum, the peer review maintains the position that individual assessments of significance should have been carried out on any heritage items in the vicinity of the development where a Statement of Significance was not publically available. We acknowledge that in the opinion of the reviewer individual heritage assessments of each heritage item in the vicinity without a statement of significance may provide a greater degree of understanding of each property, however we contend that as any potential impact will be to views of each item, this additional and considerable body of work was not warranted as reasonable in this instance.

- Regarding the 'non compliance' with the 'Statements of Heritage Impact' guidelines and the Burra Charter.

Section 1.2 identifies the methodology and best practice guidelines upon which the report was prepared – included here below for reference:

This Heritage Impact Statement has been prepared in accordance with the guidelines set out in the Australia ICOMOS Charter for Places of Cultural Significance, 2013, known as The Burra Charter, and the New South Wales Heritage Office (now the Heritage Division of the NSW Office of Environment and Heritage) publication, NSW Heritage Manual.

The Burra Charter provides definitions for terms used in heritage conservation and proposes conservation processes and principles for the conservation of an item. The terminology used, particularly the words place, cultural significance, fabric, and conservation, is as defined in Article 1 of The Burra Charter. The NSW Heritage Manual explains and promotes the standardisation of heritage investigation, assessment and management practices in NSW.

The specific issues required to be addressed in the NSW Heritage Manual (Statements of Heritage Impacts <https://www.heritage.nsw.gov.au/assets/Uploads/a-z-publications/s-u/Statements-of-Heritage-Impact.pdf>) can be found in Section 6.0 of the HIS.

Furthermore, it is not typical to assess any proposal against the Burra Charter per se, rather it is incumbent on the heritage consultant to bring an understanding of these principles to any assessment of a proposal. The Burra Charter sets out both a vocabulary as well as a set of principles that establish a shared understanding of 'best practice' when managing change that may affect a heritage Place.

We would also add that should these issues actually constitute a 'fundamental flaw and/or omission' in the report, then the conclusions of the peer review are similarly flawed, unless additional research and assessment of significance of the heritage items in the vicinity has been carried out as part of this independent review. The peer review report does not reference any additional research to underpin their conclusions.

CONCLUSION

We confirm that this report has been prepared in line with the best practice reference documents published by Heritage NSW, in the Heritage Manual publication, including:

- *Assessing Heritage Significance*, and
- *Statements of Heritage Impacts*

We further confirm that NBRS heritage are familiar with and are guided by the principles of the *Australia ICOMOS Charter for Places of Cultural Significance, 2013*, known as The Burra Charter.

In conclusion we note that the peer review has determined that the findings of the HIS are valid.

Yours Faithfully,
NBRS

A handwritten signature in black ink that reads "S. Polkinghorne". The signature is fluid and cursive, with a large initial 'S' and a long, sweeping underline.

SAMANTHA POLKINGHORNE
Director