

Mr Dimitri Gotsis  
Senior Planning Officer  
Social Other Infra Assessments  
Department of Planning, Industry and Environment  
GPO Box 39  
SYDNEY NSW 2000

By email: Dimitri.Gotsis@planning.nsw.gov.au

Dear Mr Gotsis

**RE: RESPONSE TO EIS - INTERNATIONAL CHINESE SCHOOL (SSD-10260) (WILLOUGHBY CITY)**

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I refer to your email dated 27 September 2019 regarding abovementioned state significant development application. The proposed development seeks change of use for 211 Pacific Highway (the Site) from an office premises to a school and associated works, including:

- Provision of a new vehicular access point for drop off and pick up of students;
- New security fencing surrounding the site;
- A single free-standing sign at the main pedestrian entrance facing the Pacific Highway; and
- Associated landscaping works.

Part of the subject site where the change of use is proposed (office premises) is located within the SHR curtilage of the 'Gore Hill Memorial Cemetery'. The whole of the site is listed as an item of state heritage significance on Schedule 5 of the Willoughby Local Environmental Plan (LEP) 2012 as 'Gore Hill Cemetery' (I148).

The following documents have been reviewed in preparing this response:

- *Environmental Impact Statement, 211 Pacific Highway, St Leonards, International Chinese School*, prepared by Ethos Urban dated 29 August 2019.
- *Heritage Impact Statement (HIS), 211 Pacific Highway St Leonards*, prepared by NBRS Architecture, dated 25 June 2019
- *211 Pacific Highway, St Leonards, Historical Archaeological Assessment and Impact Statement*, prepared by Extent Heritage Advisors.
- *Architectural Plans* prepared by Stanton Dahl Architects, dated June 2019
- *Landscape Plans*, prepared by Inview Design Pty Ltd, dated June 2019

Based on the above the following comments are provided:

**Built Heritage**

Use

The proposal seeks to change the use of the site of the former Sexton Cottage within Gore Hill Cemetery from 'office premises' to 'school'. The HIS argues that the proposed use of 'school' supports the ongoing active use of the place and provides for the increased public interface with the heritage item and the ongoing management and maintenance of heritage fabric within the lease area. Whilst it is acknowledged that the proposed use will lead to the ongoing use of the area, the proposed use is not conducive to the nature, character and the setting of the heritage item.

The proposed use will introduce changes to built-up spaces within the areas of heritage value both within and outside the State listed curtilage. With the use of the subject site as the primary school, the volume of traffic, both vehicular and pedestrian, will substantially increase and will adversely impact the heritage item whose inherent character and significance lies in the tranquillity and the peaceful nature of the site and not on the numbers of people visiting it.

The proposed use will also require associated works within the subject site which will have adverse impact on the heritage values of the site as discussed in the section below.

#### Associated works

The central avenue, historically known as The Carriageway, which runs from Westbourne Street in the north to the Pacific Highway in the south provides a distinctive character to the Gore Hill Cemetery. Proposed works that include 'kiss and drop' area within The Avenue/ Carriageway, which will be demarcated by the removable bollards and new ground finishing, will have an unacceptable impact on both the physical and visual character of the heritage item.

The new use will also require an installation of a new security fencing inset from the boundary of the subject site. It is noted that information provided in the architectural drawings and the landscape plans show discrepancy between the type of fencing proposed, however it is understood that the fencing will be 2.1m high. Whilst the dense vegetation along the Pacific Way will mitigate the visual impact from the extra fencing, the views to the heritage site from The Avenue, along The Avenue and the views out from the subject site will be adversely affected by the proposed fencing.

In addition, the proposed regular daily use of the public playground across The Avenue by the school children will mean increased pedestrian traffic from the subject site through the Avenue which will have adverse impact on the heritage values of the site.

Based on the above, the proposed use of the subject site as the primary school is considered to have significant adverse impact on the State Heritage Listed values of the site and is therefore not supported on heritage grounds. If the development application is approved by the Department of Planning, Industry & Environment, a condition is recommended to relocate the proposed 'Kiss and Drop' facility from The Avenue to the lesser significant area to the north east towards the Council's carpark.

#### **Archaeology**

It is noted that the application would not affect any of the areas of the cemetery previously used for burials. Therefore, the disturbance of any archaeological 'relics' within the meaning of the NSW Heritage Act, 1977, is unlikely. It is noted that if 'relics' were to be found that notification of the Heritage Council of NSW would be required under s146 of the Heritage Act, 1977, which is not suspended by the operation of the SSD provisions of the EPA Act.

If you have any questions regarding the above matter please contact Vibha Upadhyay, Senior Heritage Assessment Officer, at Heritage, Department of Premier and Cabinet on 9873 8587 or at [vibha.upadhyay@environment.nsw.gov.au](mailto:vibha.upadhyay@environment.nsw.gov.au).

Yours sincerely



#### **Cheryl Brown**

Manager, Regional Heritage Assessments - North  
Heritage, Community Engagement  
Department of Premier and Cabinet

**As Delegate of the NSW Heritage Council**

[\[day/month/year\]](#)