



artefact

3 September 2021

Mitch Ryan
Project Manager
Next Group

Dear Mr Ryan

Re: Doncaster Avenue Student Accommodation – Heritage Impact and Consistency Assessment for the proposed alteration of the rear addition.

Next Group, on behalf of Accord Property, are proposing to develop student accommodation at the property of 4 – 18 Doncaster Avenue, Kensington (the project). The project was classified as State Significant Development (SSD 9649) and approved on 21 May 2020 under clause 8A of the NSW *State Environmental Planning Policy (State and Regional Development) 2011* (SEPP) and section 4.5(a) of the NSW *Environmental Planning and Assessment Act 1979* for the redevelopment of the site, 4 – 18 Doncaster Avenue, Kensington.

The proposed student accommodation includes the construction of a three storey and basement accommodation and student facility building. The project would also include the retention and adaptive reuse of twin two-storey Victorian terraces at 10-12 Doncaster Avenue, which are listed on the Randwick LEP 2012 as “2 storey terraced pair” (LEP #122), an item of local heritage significance.

Since project determination in May 2020, further design updates have been proposed for the project. Artefact Heritage (Artefact) have been engaged by Next Group to prepare a heritage impact and consistency assessment. This report has been prepared to assess the approved impacts for the project in comparison to potential heritage impacts from the design updates for the rear addition to the heritage item.

Heritage listing

The subject site is listed on the following heritage registers as an item of local heritage significance:

- Randwick City Council LEP 2012 as “2 storey terraced pair”, LEP #122
- Located within the Randwick City Council LEP 2012 Heritage Conservation Area, “Racecourse Precinct Heritage Conservation Area”, LEP # C13

Statement of significance for 10 – 12 Doncaster Avenue

The following Statement of Significance has been extracted from the Heritage Impact Statement for the subject site¹

10-12 Doncaster Avenue demonstrates the Victorian pattern of development of this part of the Kensington area. Its lot boundaries were formed as part of the first subdivision of the 'Model Suburb of Kensington, offered at auction in 1891, with its architectural details clearly showing its period of construction. It is a two-storey semi-detached Victorian Filigree masonry terrace, constructed circa 1896. The main terracotta tiled roof is hipped, with two small gables at each end of the ridgeline and continues down over the two-storey front verandah to the main facade which consists of cast iron columns and decorative cast iron frieze work and brackets. Chimneys are painted.

The building is one of a number of similar Victorian Filigree semi-detached terraces in the local area. As a Victorian Filigree building, it is of a common architectural type and does not have the potential to add to the existing body of knowledge about the development of the local area. 10 Doncaster Avenue has an association with the racing community, with a stable constructed to the rear of the building and connected with the equestrian use of the adjoining Randwick Racecourse through its Kensington riding school.

Heritage items in the vicinity of the site

As outlined in the Heritage Impact Statement² for the subject site, two items of local heritage significance were identified. These items are as follows:

- “Walsworth”, Victorian cottage located at 25 Doncaster Avenue, Kensington (Randwick LEP #I123)
- “T’olle Goes” Federation House located at 2-4 Carlton Street, Kensington (Randwick LEP #I112)

Significant Views

The views and setting of the project area were assessed by GBA Heritage in 2018. The following assessment of the significance of the views was provided:

Views to the site are primarily from the surrounding streets including Doncaster Avenue and Alison Road. Existing vegetation surrounding 4-8 Doncaster Avenue screens much of the dwelling from view along Doncaster Avenue and from Alison Road. The main (western) elevation of the pair of semi-detached terraces is clearly visible from Doncaster Avenue. Views to the back (east) of the subject properties from the Randwick Racecourse are obstructed by a large masonry wall recently constructed as part of the light rail holding yard development. Views from

¹ GBA Heritage, 2018, *Statement of Heritage Impact 4 – 18 Doncaster Avenue, Kensington*. Report prepared for Blue Sky Commercial Asset Management.

² *ibid*

the site are to the north and south along Doncaster Avenue. There are no views between the site and Randwick Racecourse

Approved SSD Designs

SSD Approved Works

The approved SSD works included the construction of a three storey and basement accommodation and student facility building. The new building would surround the existing heritage item (10-12 Doncaster Avenue) to the north, east and south of the dwelling (refer to Figure 1). The heritage item would be converted into student accommodation, depicted in Figure 2. The approved SSD drawings depicted the construction of a rear addition for the introduction of bathroom facilities (four toilets and four combined toilet and shower facilities), with the facilities located across both floors. The rear addition was approved to the height of approximately 5000mm and to extend across the rear of the building at approximately 6500mm in length. The approved works utilised the existing rear openings along the ground floor and first floor landing to provide access to the bathroom facilities (refer to Figure 2 and Figure 3).

Figure 1: Ground floor plan of the approved development. Source: Hayball

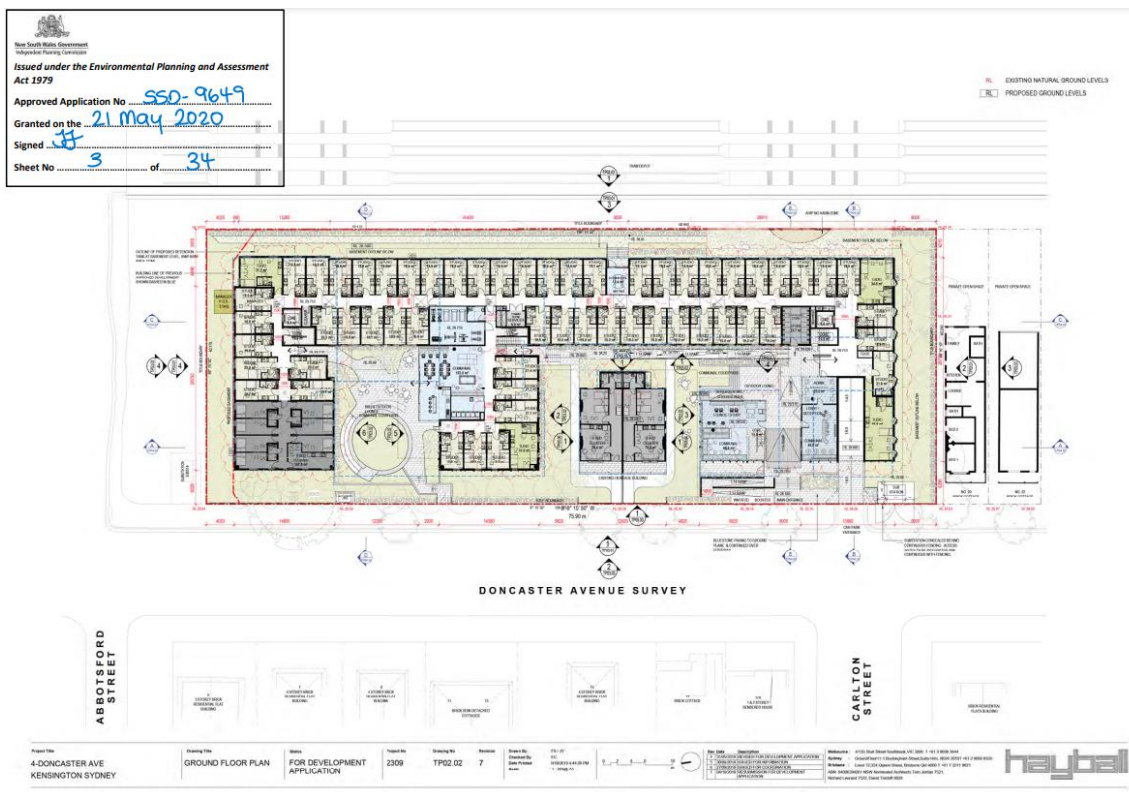


Figure 2. SSD approved floor plans. Source: Hayball

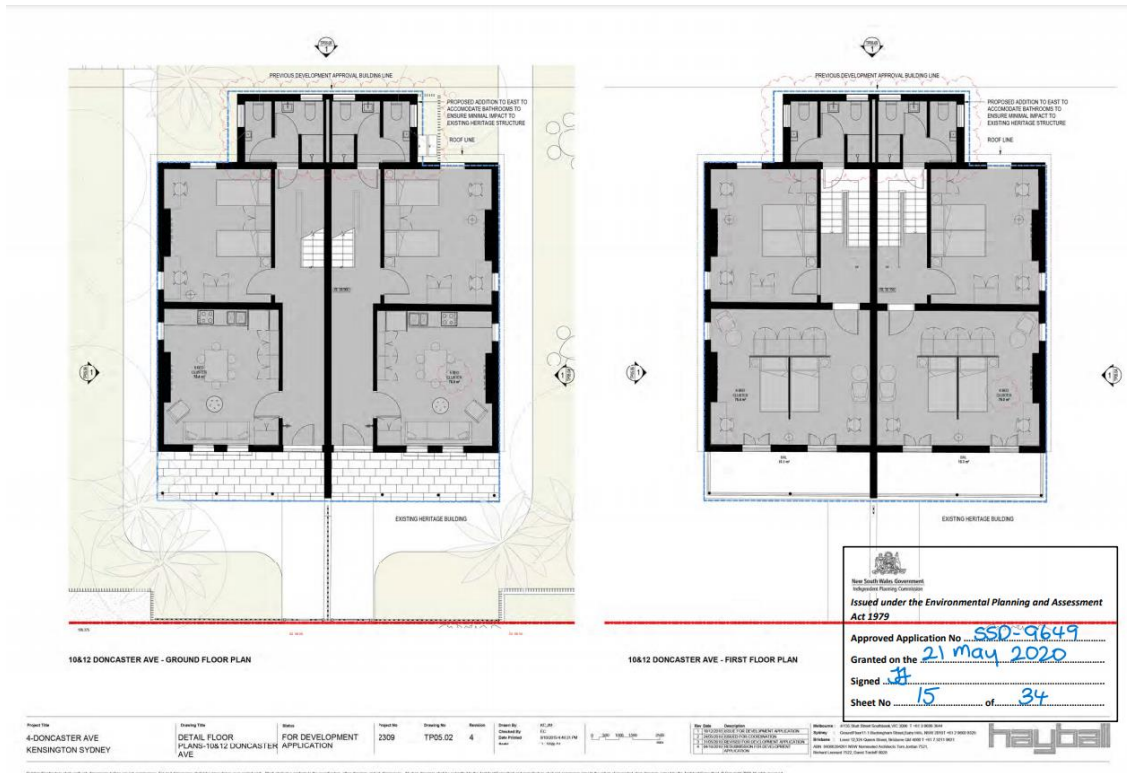
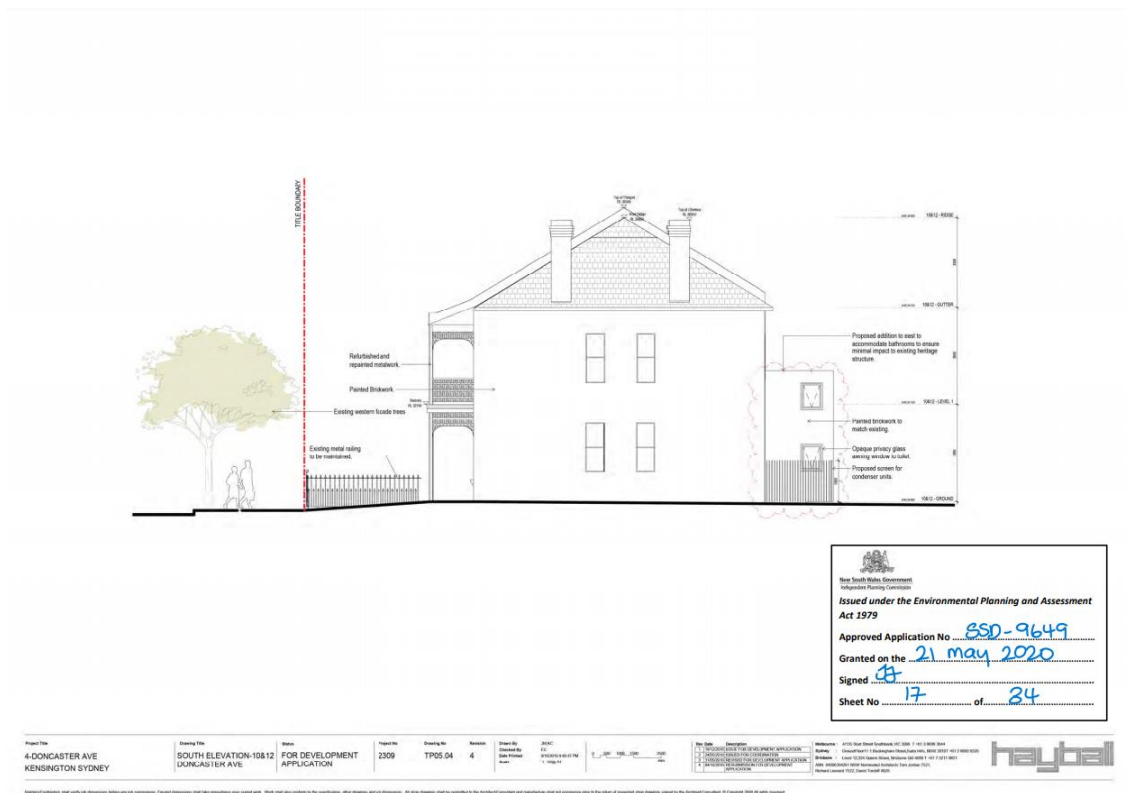


Figure 3. SSD approved elevation drawing. Source: Hayball



The Statement of Heritage Impact report prepared by GBA Heritage assessed the original SSD adaptive reuse of the heritage item and proposed rear addition as follows:

Heritage Impacts to 10 – 12 Doncaster Avenue³

Rear Addition

Any potential impact of the proposed new two-storey addition will be minimised by the small scale of its overall form and location to the rear of the heritage item. The addition will be painted brickwork to complement the heritage item, however, its flat roof form will ensure that it is identifiable as a contemporary addition. The proposed addition will accommodate four bathroom spaces. These services could be located within the main component of the terraces, however, it is desirable they are not in order to retain the spatial integrity of the rooms and significant features. Visually, the proposed addition will be subservient to the terraces due to its form, scale, materiality and siting. Additionally, it will not be visible from Doncaster Avenue. The proposed form, scale, materiality and siting of the proposed rear addition will be sympathetic to the heritage item.

...It is recommended that all new services are to be surface mounted if possible rather than chased into existing walls or structures to minimise impact on heritage fabric. Where new penetrations or fixings are proposed, it is recommended that the Heritage Consultant be advised of exact locations and nature of penetrations/fixings for review and comment prior to works being undertaken.

Currently, the heritage item has a lot boundary curtilage. This will be reduced, however, the proposed curtilage will allow the heritage item to remain interpretable by the public from the public domain.

The most significant elevation of the heritage item at 10-12 Doncaster Avenue is its western elevation, facing Doncaster Avenue. The proposed development will not adversely impact the ability of the public to view this elevation and the significance of the building generally.

Heritage Impacts to Items in the vicinity⁴

The proposal will not obstruct any significant identified views within the HCA, or between the site and the heritage items at 25 Doncaster Street and 2-5 Carlton Street

Proposed new works and justification

The Section 4.55 (1A) modification seeks to modify the Conditions of Approval (CoA), specifically modifications under A1.

Updated designs (Figure 4 and Figure 5) depict a change to the scale, form and layout of the proposed bathroom facilities. The proposed changes would increase the height of the rear addition by approximately 1100mm, resulting in a total height of 6100mm. The approved flat roof design

³ ibid

⁴ ibid

would be retained, and the existing roof of the heritage item would not be impacted by the development. The proposed addition would also not impact upon the eaves of the item. The proposed width of the addition would be slightly increased by approximately 600mm. The proposed extension of the building footprint would not result in any additional impacts then those acknowledged under the approved design. No modifications have been made to the proposed materiality of the addition.

Internally, the modifications to the rear addition would retain the use of the existing ground floor openings (where they are located). The two openings located under the stairwells of both buildings would lead into the two internal bathroom facilities. The existing, non-original entry from number 10 (Figure 6) would lead into the northern bathroom facility. Under the proposal, a new opening would be required from the ground floor rear room of number 12 (Figure 7) into the southern bathroom facility.

At the stair landing for both buildings, the two internal bathroom entryways would utilise a portion of the former (currently infilled) openings (Figure 8 and Figure 9). Under the proposal, two new openings would be required for the northern and southern bathroom facilities. These openings would require the partial removal of the rear brick façade of the building (refer to Figure 10 and Figure 11).

Due to these changes, there would be an increase in the removal of original fabric within the item although it is noted that this elevation has undergone various modifications including the introduction of intrusive fenestration and damage to the brick façade (Figure 12).

Figure 4. Proposed floor layout. Source: Hayball



Project Title DONCASTER STUDENT ACCOMMODATION 4-18 DONCASTER AVE, KENSINGTON, NSW	Drawing Title DETAIL FLOOR PLANS-10812 DONCASTER AVE	Author FOR DEVELOPMENT APPLICATION	Project No. 2309	Drawing No. TPOS-02	Revision 6	Drawn By KJ/ML	Checked By KJ/ML	Date 11/11/2024	Scale 1:100	By Date 11/11/2024	1. PRELIMINARY DESIGN 2. DEVELOPMENT APPLICATION 3. APPROVALS 4. CONSTRUCTION	4100 Stock Street, Kensington NSW 1585, 1 800 000 000 Sydney NSW 1585, Australia Level 2, 200 Queen Street, Brisbane QLD 4000, 1 800 000 000 PO Box 999, Brisbane QLD 4000, Australia Tel: 07 3838 8888 Fax: 07 3838 8889 Email: info@hayball.com.au
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Figure 10: View towards the rear elevation of the first-floor bedroom, 10 Doncaster Avenue. Note intrusive window frame.



Figure 11: View towards the rear elevation of the first-floor rear bedroom, 12 Doncaster Avenue.



Figure 12: View towards the rear elevation of the heritage item. Note intrusive fenestration and damage from previous additions and modifications.



Conditions for Approvals

The Determination Report for the project includes the following relevant Conditions of Approval, which declare that:

Part A: Administrative Conditions

(A1) In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to

*the environment that may result from the construction and operation of the development, and any rehabilitation required under this consent.*⁵

The proposed design for the modification of the rear addition could result in additional impacts to the heritage item and thus would prompt a heritage impact assessment under Condition A1 of the Conditions of Approval. This memo has been prepared to fulfill this requirement.

SSD Heritage Impact Assessment

As assessed in the SSD Heritage Impact Statement (HIS) the approved design mitigated any potential direct (physical) impacts through the overall scale and form of the addition, in addition to its proposed materiality. The use of the flat roof was assessed as 'ensur(ing) that it (the addition) is identifiable as a contemporary addition'.⁶ These mitigation measures were found to be a subservient response to the heritage item and its proposed siting would not be visible from Doncaster Avenue.

The HIS assessed that the significant view lines towards the heritage item would not be adversely impacted or obscured by the rear addition.

The SSD HIS assessed that the two heritage items in the vicinity would not be adversely impacted by the new addition.⁷ The HIS noted that views to and from the Randwick Racecourse are obstructed by a large masonry which was constructed as part of the light rail holding yard development.⁸

Updated designs - Heritage Impact Assessment

The updated designs (Figure 4 and Figure 5) depict the proposed rear addition updates to the SSD approved drawings.

External works

The proposed design increases the SSD approved height of the rear addition by 1100mm and the approved width of the structure by 600mm. These works would not impact upon the existing roof form or eaves of the heritage item. The proposed flat roof form, coupled with the proposed (and approved) material scheme would retain the visual characteristics as a modern introduction. Due to the approved surrounding development, the proposed rear addition would not be visible from the primary view towards the item from Doncaster Avenue. As such, the external works would not result in any adverse indirect (visual) impacts.

Internal works

Internally, the proposed works would be located along the rear elevation and would require the localised removal of the existing brickwork for the introduction of three new openings. These works would be located within the first floor opening to the rear bedroom of 10 Doncaster Avenue, and two openings to the rear of the ground and first floor of number 12 Doncaster Avenue. In addition, the infilled openings at the stair landings within both structures would be partially reused for new entrances, with a portion of original brickwork to be removed within these locations.

⁵ NSW Government, 2020. *Development Consent – Key Sites: Doncaster Avenue Student Accommodation (SSD9649)* p. 9.

⁶ GBA Heritage, 2018, *Statement of Heritage Impact 4 – 18 Doncaster Avenue, Kensington*. Report prepared for Blue Sky Commercial Asset Management.

⁷ *ibid*

⁸ *ibid*

The proposed works would result in localised direct (physical) impacts to original fabric including the brick elevation of the building and limited, localised removal of timber skirting boards. However these impacts have been minimised by the use of existing openings across the elevation, in addition to localising the impacts to the rear of the building and retaining the original form and function of the internal spaces of the structure. Additionally, the removal of the brickwork of the fabric is reversible if the rear addition was to be demolished in the future. As such, the proposed introduction of these new openings along the rear elevation of the item would result in a **negligible** direct (physical) impact to the building.

Heritage considerations for the proposal

Heritage guidelines⁹ prepared by the NSW Heritage Office (now the Heritage Division of the OEH) outline design considerations for projects that involve minor demolition to a heritage item. These considerations are discussed in Table 1 below.

Table 1: Heritage considerations for minor partial demolition to a heritage item

Heritage consideration	Discussion
<ul style="list-style-type: none"> Is the demolition essential for the heritage item to function? 	<p>The proposed minor demolition works would allow the item to be adaptively reused for the purposes of student accommodation with attached bathroom facilities for each individual room. By introducing an addition to the rear of the building, the item can retain the original floor layout of both dwellings.</p>
<ul style="list-style-type: none"> Are important features of the item affected by the demolition (e.g. fireplaces in buildings)? 	<p>The minor, localised demolition works would require the partial removal of the buildings rear brickwork and localised removal of existing internal timber skirting boards to install the openings. Recommendations have been provided below in order to mitigate these impacts and retain as much of the original fabric within the structure as possible.</p>
<ul style="list-style-type: none"> Is the resolution to partially demolish sympathetic to the heritage significance of the item? 	<p>The minor removal of the rear brick elevation of the item is considered a sympathetic response to the overall significance of the structure. By retaining the floor layout and moving the intrusive works to the rear of the building, the proposed works promotes the conservation and longevity of the building through the adaptive reuse of the space.</p>
<ul style="list-style-type: none"> If the partial demolition is a result of the condition of the fabric, is it certain that the fabric cannot be repaired? 	<p>The proposed works are not in response to the adaptive reuse of the space.</p>

Consistency Assessment

The proposed works would result in a negligible direct (physical) and neutral indirect (visual) impacts to the overall heritage item. The approved level of impact to heritage items within the Statement of Heritage Impact was not directly addressed as a magnitude of the project's direct, indirect or potentially direct impacts on heritage items as produced by the International Council on Monuments and Sites (ICOMOS). However, the impact assessment determined that 'any potential impact of the proposed new two-storey addition will be minimised by the small scale of its overall form and location to the rear of the heritage item'. This statement, and the general overall impacts to the building assessed under the previous approved works, is consistent with a negligible level of impact

⁹ 'Statements of Heritage Impact', Heritage Office and Department of Urban Affairs and Planning 2002

to a heritage item. As such, the proposed works are consistent with the SSD approved works to the heritage item.

Conclusions

This heritage impact assessment has found that:

- The proposed works would result in a **negligible** adverse direct (physical) impact to the heritage item , 10 – 12 Doncaster Avenue
- The proposed works would result in a **neutral** indirect (visual) impact
- The proposed works would not result in any adverse direct (physical) or indirect (visual) impact to the heritage items in the vicinity
- The proposed works have aimed to minimise direct (physical) and indirect (visual) impacts through the use of localised impacts to existing fabric and limit the scale and form of the new structure to the rear of the heritage item.
- The proposed works are consistent with the approved SSD heritage impacts

Recommendations

The proposed works would result in a negligible direct (physical) impact to the heritage item. The following recommendations are provided in order to mitigate the impacts to the heritage item and surrounding streetscape.

- The approved materiality for the rear addition should not be amended
- Where possible, salvage any timber skirting boards for reuse within the building; this includes repurposing the timber for the proposed opening architraves
- Where possible, salvage brickwork for reuse with the item, particularly where evidence of external damage is apparent or missing bricks are required for infill
- The removal of the brickwork should be conducted using hand tools to avoid inadvertent direct (physical) impacts
- Protect original timber flooring elements before demolition works using protective sheeting

Regards,



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