Heritage impact external

1. Omission of rooftop additions

The rooftop play areas were intended in the original design to reduce the impact on the surrounding bushland. As stated by Urbis the omission of the rooftop COLAs does provide an aesthetic gain to the building in retaining "hillside village" design, stepping down with the topography but there is a clear loss to the immediate surrounding bush setting. Please see Council submission on landscaping for further comments.

2. Loop Road

The loop road is an onsite solution to a traffic challenge created by the queuing of buses at the school site.

After considering numerous options, the design team (ARUP) resolved that:

"a one-way loop road through the site utilising the alignment of the fire access trail would provide an adequate bus facility" p.20.

Urbis in their Response to Submissions 2019 described this as a:

"comprehensive solution to the traffic issues" and is "in line with Policy 124 of the CMP (Urbis, 2018) which allows for the introduction of new roads only where necessary for the school use, fire compliance or emergency vehicle use"

A previous Heritage Impact Assessment and Conservation Strategy for the site prepared by Graham Brooks and Associates (now GBA) in support of the 2008 rezoning stated:

"the introduction of new roads or landscaped road reservations into the bushland should be restricted to those required for emergency and fire fighting vehicles"

The change in policy between the GBA assessment and the Urbis CMP is not explained/justified within the conservation management plan. <u>Note: the Urbis CMP is not endorsed by any</u> <u>independent third party such as Heritage NSW (former Heritage Division).</u>

In terms of heritage impact the loop road is not supported as the preferred solution. While the loss of trees is low, the continued incremental loss, first from the APZ and now to build the road, is creating a denuded space in the landscaped area closest to the southern façade. This will have a detrimental impact on the setting. The relationship between the campus building and the immediate landscape is a key element of the original design. The "brutalism' is moderated by the way in which the College was designed to respond to the topography and bushland setting of the site.

In the LLV CMP one of the guidelines for managing the landscape and setting is "Future development should be cognisant of and seek to retain the native bushland landscaping and setting of the site to the greatest extent feasible (noting the constraints of fire legislation as set out above)" p.281.

The Stage 1 Assessment of Heritage Impact (24 August 2018) prepared by Urbis states:

"In order to minimise and mitigate impacts of the tree removal, the minimum number of trees necessary to ensure appropriate fire protection would be removed. It is appreciated however that this constitutes substantial number of tree plantings within the APZ zone.

It is noted that although the majority of the trees within the immediate context of the school would be removed. The plan below shows that some of the largest trees on the site would be retained. This includes some trees in close proximity to the building."

Figure 2 Proposed tree removal plan showing area for IPA – Parkland (Stage 1 Assessment of Heritage Impact, Urbis, 2018) lists the following tree numbers for removal and retention:

Trees outside existing APZ

Trees to be removed - 538

Trees to be retained - 149

Trees within existing approved APZ

Trees to be removed - 301

Trees to be retained – 112

From the above list only 24% of trees were to be retained. The proposed Loop Road will require an additional 10 trees to be removed. This equates to the removal of 4% of the already meagre number of retained trees.

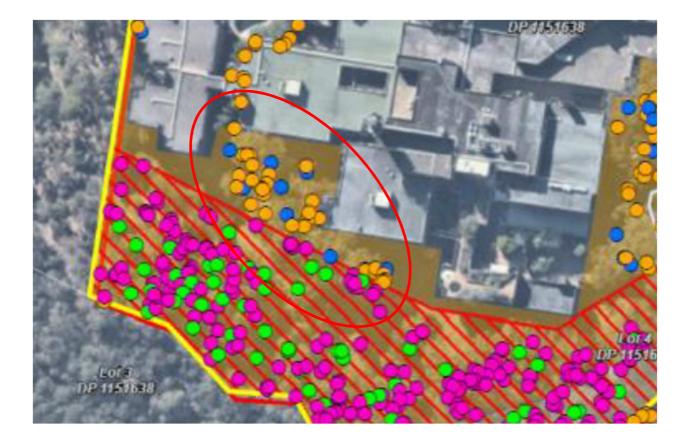
So now of the original 1100 trees identified on the site plan only 251 will remain.

The Urbis Response to Submissions 2019 states:

"The Link Road would require the removal of an additional 10 trees. It is acknowledged that this proposed in a landscape which has already been denuded of most of its trees. Although 10 trees is a small number in the context of the surrounding National Park some heritage impact must be acknowledged."

This assessment lacks an analysis of where these trees are sited and the localised impact of their loss as opposed to a numerical assessment of the total loss of trees for the total site. The clearance of the inner ring closest to the building has already been severe.

Figure 1: Proposed tree removal plan. Yellow and pink trees to be removed. (Source: Kleinfelder Landscape Management Plan August 2018)



The new use of the site for educational purposes is supported. The need to make the school safe for students and staff by providing an adequate APZ is acknowledged and supported

The ongoing incremental loss of trees and setting for purposes beyond the provision of access for emergency and fire fighting vehicles is not supported. While the loop road is a convenient solution to the traffic issues it will have a detrimental impact on the relationship of the building with its natural setting. Unlike a firetrail, the gated and fenced loop road with its hard surface despite the claimed lack of height will create a strong competing visual element that further disconnects the building from the bushland setting.

3. Partial demolition of link between stages 1 and 5 for link (loop) road

In the absence of a loop road, there is no longer a requirement to demolish fabric of moderate significance. In the event the loop road proceeds, the demolition of moderate fabric and a single planter is preferable to further loss of trees and intrusion into the bushland setting.

4. Landscaping works

Please see Council submission on landscaping for further comments.

5. Proposed bushfire management solutions

Link road

The link (loop) road in the current plan represents a realignment and widening of the former approved fire trail. There is no objection to the fire trail as it is a necessity. The objection is to the wider, realigned loop road (see Point 1).

Building alterations

There is no objection to the options formulated for the fire shutters and replacement steel frame windows and doors.

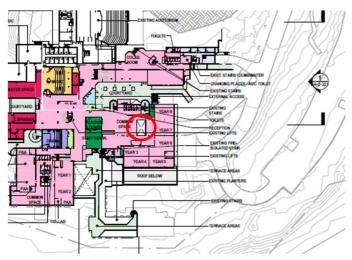
6. Demolition south façade level 1

A proposed new opening for the purpose of an entry to Homebase 2 will require the removal of some original fabric, however sufficient fabric remains to demonstrate the original character of the building. There are no objection to the new opening as an entrance for Homebase 2.

7. Demolition of slab level 4 zone courtyard for light well

The partial demolition of the slab on level 4 and above the former library to improve light penetration will result in the minimal loss of original fabric. The "horizontal window" or glass flooring is the preferred option for the treatment of the new opening.

Figure 2: Level 4, proposed are of slab to be removed circled in red



8. Alterations to COLA

The new COLA is an improvement on the previous design as the roof-form and bright colours were somewhat intrusive. The new COLA is much wider than the previous version and will obscure more of the southern façade. If the supporting panels were minimised as opposed to the large splayed triangles, the impact on views to the southern elevation could be minimised, and improving sightlines to the curved road would also improve student safety.

While the colour palette is something that was approved in Phase 1, the use of such bright colours with no obvious association with the exterior of the building or the bushland setting still remains an ongoing concern. The choice of these colours did not have a heritage rationale. It is referenced in the Built Form and Urban Design report (31 March, 2017).

"In order to make the facades more attractive to younger students, it is proposed to apply prefinished coloured panels to the exterior of the building to break-up the concrete appearance, identify various parts of the building, define home bases and highlight points of entry:".

The Heritage Impact Statement (2017) states:

"It is considered the proposed colouring of various elements enhances the application of bright feature colours in various areas whilst serving to highlight contemporary elements and ensure they are readily identifiable as such"

This statement in the HIS 2017 is a misinterpretation of Article 22 of the Burra Charter.

The *Burra Charter Practice Note Article 22 – New Work* (2013) amends the previous article "New work should be readily identifiable as such" with the addendum "but must respect and have minimal impact on the cultural significance of the place" p.1.

While new work should be readily identifiable, it should also:

- Not adversely affect the setting of the place (Article 8)
- Have minimal impact on the significance of the place (Article 21.1)
- Not distort or obscure the cultural significance of the place, or detract from its interpretation and appreciation (Article 22.1)
- Respect and have minimal impact on the cultural significance of the place (Article 22.2)

"New work should respect the context...and not overpower it" p.2

While the use of colour elements in the interior is considered appropriate, there is no precedent for the vibrant colour scheme proposed on some new elements to the exterior. It is acknowledged that colour is necessary for way-finding for new and earlier stage students such as Early and Late Stage 1.

An alternative to the vibrant colours selected could be a contextual colour palette taking inspiration from the surrounding flora. The vegetation community is described as Sydney Sandstone Ridgetop Woodland; Sydney Sandstone Gully Forest and other vegetation. The colours found in the environment are still variable, including yellows, reds, greens, blues, pinks and purples but the tonal variation is more muted much like the eucalypt green of the House of Representatives and shades of ochre red in the Senate at the Parliament House of Australia.

It is preferable for the use of colour to be restricted to wayfinding purposes and its application be minimal. The use of RGB primary and secondary colours should be avoided. Instead tonal variants that reflect the natural colours in the bushland setting are preferred.

9. Refurbish existing planters

As stated the planters are graded as having exceptional significance. Any works which conserve these planters while improving their function is supported. The use of native plants is encouraged.

10. Spiral stairs

The spiral stairs have a high level of significance. Their retention and use is supported. The use of the orange stair riser is appropriate give the use of colour in the interior.

Impact on interiors

The current building is unsuitable in many respects for the proposed new educational establishment and will require the demolition of many interior walls. This will remove built form that demonstrates the original design, however the proposal reflects the original design in that both respond to contemporary educational needs.

1. Removal of concrete wall adjacent to spiral stair

The removal or "penetration" of this wall is not supported. From the images it appears to be offform an concrete wall. The concrete walls are original fabric of exceptional significance. Much of the interior is being removed to allow the site to function as primary and secondary educational facility. The unnecessary and seemingly optional removal of this wall so close to such a significant element being the spiral staircase cannot be supported. Alternative solutions to provide light should be explored and the wall retained. A secondary option would be the use of a high-light window which will allow light but keep most of the wall intact as opposed to such an excessive and generous opening.

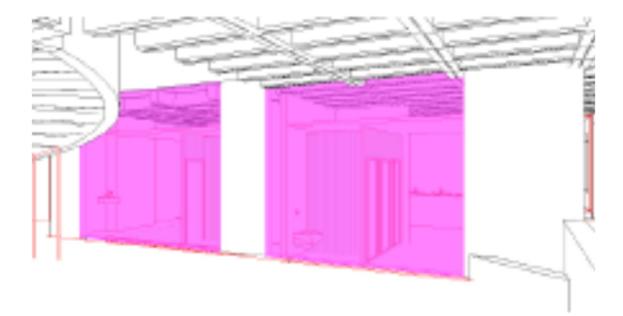


Figure 3: section of concrete wall to be removed (Source: Lacoste Stevenson)

2. Removal of concrete on level 4 for reception window

The removal of highly significant fabric for essential needs where suitable alternatives cannot be found is unfortunate but can be accepted in the greater scheme. To create a reception area at the Level 4 main entry is considered as essential. Of the options option 3 has the least impact and is supported.

Figure 4: section of concrete wall to be removed (Source: Lacoste Stevenson)

