

Mr Navdeep Singh Shergill
Planning Officer
Major Projects Assessments
Department of Planning Industry and Environment

By email to: navdeep.singhshergill@planning.nsw.gov.au

Dear Mr Singh Shergill

RE: Lindfield Learning Village, 100 Eton Road, Lindfield (SSD-81146) (KU-RING-GAI COUNCIL) – Response to Submissions

I refer to your email dated 20 November 2019 inviting comment on the Response to Submissions (RtS) for the abovementioned State Significant Development application which involves additions and alterations to the former UTS Ku-ring-gai Campus (Lindfield Learning Village).

The former UTS Ku-ring-gai Campus (originally the William Balmain Teachers College) is not currently listed on the SHR. However, the Heritage Council has recommended this site be listed on the State Heritage Register for its potential state significant historic values, architectural and landscape values and historic association values. The recommendation was made under section 32(2) of the Act. The Minister must now decide whether to exercise his discretion and direct listing of the item under section 34 of the Act. The site is listed as a heritage item in the Ku-ring-gai Local Environmental Plan (KLEP) 2015.

This State Significance Development (SSD) application (SSD 8114) sought consent for works to the former UTS Ku-ring-gai Campus to adaptively re-use it as 'Lindfield Learning Village' (a school) that would accommodate approximately 2,100 students from kindergarten to Year 12 and a Childcare Centre. To meet its commitment to open the school on Day 1, Term 1, 2019, Department of Education (DoE) was granted partial consent for Phase 1 which would permit a school for 350 students for Term 1, 2019.

The delegate of the Heritage Council of NSW has previously provided comments to the Phase 1 Response to Submissions of SSD 8114 application. It is noted that this RtS relates to the remainder of the development including the following,

Phase 2(a)

- Minor internal works within the approved Phase 1 area to accommodate an additional 35 students.
- The additional 35 students (a total of 385 enrolled students) is needed for Day 1 Term 1 2020, prior to Phase 2(b) being completed.

Phase 2(b)

- Works to accommodate 1,050 students (including the approved 350 and 35 in Phase 2a).
- Repurposing of the Phase 1 area.

- A loop road around the southern portion of the site for emergency vehicles, buses and drop off and pick up vehicles.

Phase 3

- Works to accommodate an additional 950 students in the western wing of the building.

Updated bushfire measures

- In addition to the above works Phase 2(b) and 3 also require updated bushfire measures that include both works to the building and landscape. These bushfire works are consistent with bushfire works approved under Phase 1 consent conditions.

The RtS documents listed below respond to the heritage conditions for the Phase 1 works as part of the amended application for Phases 2 and 3.

- RtS – Phases 2 and 3 - Lindfield Learning Village (SSD 16_8114) prepared by URBIS, dated 16/09/2019
- Heritage Impact Assessment - Lindfield Learning Village, prepared by URBIS, dated 12/09/2019. This document is prepared as an addendum to the Heritage Impact Statement prepared in June 2017.
- Supplementary RtS - Lindfield Learning Village, prepared by URBIS, dated 30/08/2018
- Traffic and Transport Assessment RtS – Lindfield Learning Village Phase 2 and 3, prepared by Arup, dated 11 September 2019

Heritage Council (HC) comments on the proposed Phase 2 and 3 development SSD 8114– External Works:

1. *The omission of rooftop additions*
The omission of new rooftop structures retains the existing stepped and modulated building form and is consistent with the CMP (Policy 36). The proposed modification retains the significance of the Sydney Style building and its setting and is supported.
2. *Link Road*
The proposed loop road will remove a large area of the surrounding natural setting of the building including vegetation and rock outcrops, however it provides for the operational continuity of the item while preserving the principal northern entrance area as relatively intact. Whilst the link road is introduced between the building and the surrounding landscape it can be supported as it will retain the visual connection and will not significantly detract from the ability to interpret of the building within its bushland setting.
3. *Partial demolition of link between stages 1 and 5 for link road*
The ground floor of the link between Stages 1 and 5 of the building, graded as moderate significance, is proposed to be demolished to enable the new loop road to pass through to the rear of the building. The bulk of the ground floor section to be demolished comprises large areas of anodised glazing that is attributed little significance in the CMP. The removal of the planter box and service area adjacent to the link removes part of the original landscape design recommended to be retained (Policy 44 CMP) however as a service/courtyard area it is assessed as of lesser significance. The partial demolition of the link would have some heritage impact on the

heritage values however it can be supported as the retention of the first floor enables the original configuration to be interpreted and the requires less tree removal than the alternative via the western side of the Stage 5 building.

4. *Landscape works*

The proposed landscape works to the southern section of the site seek to mitigate the intrusion of the link road while introducing a variety of landscape treatments for useable play spaces. Whilst the proposed landscape materials, limited use of turf and retained pockets of indigenous vegetation are sympathetic to the natural bushland setting, the formality of the paths and spaces that extend to the site boundary fail to reflect the forms and features of the natural topography.

This is considered inconsistent with the landscape philosophy of Bruce Mackenzie, the original landscape architect, that maintained, '*existing contours, rocks and trees can be the main determinants of composition*', emphasising the importance of the '*often-subtle juxtapositions between built elements and soft landscaping and remnant bushland on the site*' (CityPlan Heritage 2004).

- It is recommended that as for Phase 1, a condition of consent be included requiring that the landscape works in the southern section of the site be finalised in consultation with Bruce Mackenzie to ensure a sympathetic approach in accordance with the landscape philosophy.

5. *Proposed bushfire management solutions*

The introduction of the shutters will have a moderate heritage impact however as the same principles were applied in the delivery of the Phase 1 School it can be supported with the application of a similar condition regarding the fire protection measures to that provided for Phase 1.

6. *Demolition South Façade Level 1*

The removal of an area of louvres and a small section of brick wall to the south façade, graded high significance, is proposed. The anodised windows are graded of little significance and as they are not part of a fenestration pattern, their removal is consistent with the CMP fenestration policy. However, the removal of brickwork to slightly enlarge the opening is irreversible and will remove significant fabric.

- It is recommended that a condition of consent be included requiring that an alternative fenestration design is recommended for the South Façade Level 1 to ensure that the existing masonry wall is preserved intact.

7. *Demolition of slab Level 4 Zone F Courtyard for lightwell*

The proposed removal of a section of floor slab including a section of original tiles proposed to achieve a light access to the space below is irreversible and will impact on a space that is graded as of high significance. It is inconsistent with CMP Policies and will have an irreversible physical and visual impact on the significance of the item.

- It is recommended that a condition of consent be included requiring that an alternative light source is designed to ensure that the highly significant Courtyard is preserved intact.

8. *Alterations to COLA*
The proposed COLA has been reduced in length and is wider than the original design. The height remains below the exposed slab of Level 3 and there is no impact on the spiral stairs to the east of the COLA, consistent with the original design. The design is consistent with the CMP and can be supported.
9. *Refurbish existing planters*
The proposed installation of drainage systems and replacement of damaged tiles is consistent with the CMP and can be supported.
10. *Wood and metal elevation – dust extraction*
External additions are proposed to the wood and metal workshops including a steel roof for an external learning area. The additions have been designed so not to detract from the original façade and have been located to avoid any fixtures on the south façade and are supported.
11. *Spiral stairs*
The spiral stairs through the building are proposed to be modified for compliance. Modifications to the handrail position and the insertion of a riser ensure the treads and risers are compliant. The proposed pink handrails and orange risers are in keeping with the original contemporary overlay applied in Phase 1 and can be supported.

HC comments on the proposed Phase 2 and 3 development – Internal Works

12. *Removal of concrete wall adjacent to spiral stair*
The proposed removal of two portions of concrete wall (3853mm wide and 3376mm wide x 2700mm high) for increased light penetration will require the removal of a substantial amount of original fabric, identified in the CMP as of high significance. The removal of a substantial area of the existing concrete wall adjacent to the spiral stair will have an irreversible physical and visual impact on the significance of the item.
 - It is recommended that a condition of consent be included requiring that an alternative light source is designed to ensure significant fabric and views are preserved intact.
13. *Removal of concrete on level 4 to allow for reception window*
The proposed creation of an opening within the concrete element of the of the Level 4 Main Entry for the reception will require the removal of visually prominent original fabric, identified in the CMP as of high significance. None of the five options provided avoid the demolition of a section of this visually prominent concrete wall. This is inconsistent with the CMP (Policy 27) and with a previous condition of consent (B34) that require new works to be designed as reversible. The removal of a section of the concrete wall adjacent to the Level 4 entry, will have an irreversible physical and visual impact on the significance of the item.
 - It is recommended that a condition of consent be included requiring that an alternative location for the reception is found to ensure that the Stage 1 and 2 off form concrete walls and the existing visual connections between floors, are preserved intact

Further recommended conditions of consent for SSD 8114 Phase 2 and 3 works:

- A suitably qualified and experienced heritage consultant should be nominated for this project. The nominated heritage consultant should provide input into the detailed design resolution and conservation methodologies adopted to minimise impacts to heritage values.
- New works should be designed to be reversible in the future. Methodologies are to be prepared for all proposed internal and external works to the building to avoid irreversible impacts on the significant fabric.
- A schedule of conservation works prepared for the remainder of the site is to be prepared for the existing building and implemented as part of the project.
- Proposed maintenance works should be guided by appropriate methods prepared by a qualified heritage consultant.
- The Unexpected Finds Protocol (UFP) be prepared for Phase 1 remain in place for the duration of the construction works for Phase 2 and 3 (C32 and C33).
- The schedule of conservation works prepared by Apex, dated October 2018, and the Interpretation Strategy prepared by Urbis are listed as consent documents.
- The methodology for the cleaning of the concrete prepared by Waterstone Concrete and the methodology for the removal, salvage and reinstatement of the extant timber ceiling of the existing library area, prepared by DesignInc, are listed as consent documents.
- The detailed design of fire protection measures must be reviewed and approved by the nominated heritage consultant.

If you have any questions regarding the above, please contact Tempe Beaven, Senior Heritage Assessment Officer at the Heritage NSW, Community Engagement, Department of Premier and Cabinet, on 9873 8629 or Tempe.Beaven@environment.nsw.gov.au.

Yours sincerely



Cheryl Brown
Manager, North Region
Heritage NSW, Community Engagement, Department of Premier and Cabinet
As Delegate of the NSW Heritage Council
13/12/2019