

8 May, 2018

Navdeep Shergill
NSW Planning & Environment
GPO Box 39 SYDNEY 2001

Dear Mr Shergill,

Waitara Public School re-development - Nos. 48 – 58 Myra Street, Waitara.

I refer to your letter dated 26 March, 2018 regarding the above matter.

The subject site is zoned R2 Low Density Residential under Hornsby Local Environmental Plan 2013 (HLEP). Educational Establishments are permitted with consent in the subject zone.

Clause 4.3 of HLEP provides for a maximum building height of 8.5 metres on the Height of Buildings Map. Any variation to the maximum height should have regard to the character of the area, visual impacts, privacy and overshadowing to adjoining residences.

Clause 5.10 of HLEP provides for Heritage Conservation, in this regard Waitara Public School is listed as a heritage item (No. 760 – *grounds, excluding buildings*) under Schedule 5 (Environmental Heritage) of the *Hornsby Local Environmental Plan 2013*.

The property is also located within the Wahroonga (North) Heritage Conservation Area (HCA) and within the vicinity of the local heritage item No. 746 (*House*), an early intact example of a Post War period textured brick bungalow constructed in c1947.

Heritage Significance

The heritage listing for the property relates to a prominent stand of indigenous trees and cultural tree planting from c1940/50's conserved within school grounds. The public school also contains contributory buildings to the Wahroonga (North) HCA, a post-1892 subdivision exhibiting a valued collection of Federation, Inter War and Post War development complemented by the landscaped setting that is becoming rare within the Hornsby area.

Buildings of high contributory significance protected under the Wahroonga (North) HCA include Building A, the original the primary school house constructed in 1939 and Building J, the original infants' school house constructed in 1927. Building B (approved for demolition) had a medium level of significance, while the other buildings within the site constructed over the Post War period contain a low level of significance being later ancillary buildings constructed to support the ongoing use and expansion of the primary school.

Assessment

Demolition

The Heritage Impact Statement prepared by Heritage 21 (dated December 2017) fails to provide a detailed fabric list and heritage assessment for all of the individual buildings proposed for demolition. Notwithstanding, to facilitate the requirement for development of the site, no concerns are raised to the demolition of the classrooms and ancillary buildings dating from the late 1950s and 1960s, the Hall (constructed in 1985) and the modern metal demountable classrooms.

Objections are raised on heritage grounds to the demolition of Building A and J, the two primary significant buildings located on the subject site. Both buildings warrant a high degree of heritage value and are prominent historic buildings intrinsic to the history of the site and contribution to the original building forms protected by the Wahroonga (North) HCA. Demolition is inappropriate having regard to Part 9.3.10 of the *Hornsby Development Control Plan 2013* (HDCP) and would have a detrimental impact on the overall contribution of the Waitara Public School to the HCA.

The Heritage Impact Statement has not demonstrated alternative locations for the new building form and landscape features to preserve the built heritage values of the site in conjunction with the ecological values of the heritage listed trees. Building J (the original infants' school house) is constructed of timber as such relocation within the site is a viable opportunity that should be further investigated.

Learning Centre

The following assessment is provided concerning the suitability of the proposed new Learning Centre in accordance with *Section 9.3.1 Heritage Conservation Areas and 9.3.10 Wahroonga North HCA within the HDCP*:

General Design Provisions	Comment
Siting	<p>No concerns are raised to locating a new Learning Centre within the north-western corner of the site. It is the traditional location used for classrooms within the site, it would be located respectfully away from the residential portion of the Wahroonga (North) HCA and provide minimal disturbance to the existing trees on the site to reduce the heritage impact.</p> <p>Objections are raised to the demolition of Building J. The new development should be re-sited and designed to ensure retention of Building J. Alternatively, at a minimum Building J should be relocated to another location within the school site.</p>
Height, Bulk and Scale	<p>The proposed height, bulk and scale do not comply with the heritage provisions for development within the Wahroonga (North) HCA. However, it is acknowledged the future expected student growth for the site requires the need for higher density development rather than continuation of the development of the single and two storey buildings.</p> <p>Further acquisition of adjacent land is preferable from a heritage perspective to retain the characteristic low scale building. This option was not presented within the Analysis of Feasible Alternatives (Part 1.5 of the Environmental Impact Statement) and should be investigated to provide sufficient justification to proceed with the current proposal which is inconsistent with the heritage conservation controls for the site.</p> <p>Should further acquisition of land not be feasible, no objections would be raised to the proposed three (3) to four (4) storey building height on the grounds that it is the only feasible option for future development of the site. In this case, the bulk and scale of the north and west elevations should be reduced by stepping the building in at the top level. This would reduce the level of impact on the visual setting of the new work in the context of the predominantly single storey scale Wahroonga (North) HCA.</p>
Articulation	<p>Further articulation should be introduced to reduce the overt building scale in respect to the surrounding low scale built environment. The sky blue square protruding element is an unsympathetic dominant feature which highlights the excessive bulk of the building and should be deleted.</p>
Materials & Finishes	<p>Part 9.3.1 of the HDCP requires new materials to complement the period and style of the conservation area, be compatible to, by not necessarily matching the existing. Exclusive use of PC cladding and introduction of colour (sky blue) would have an adverse visual impact on the collective visual catchment of the building stock of the Wahroonga (North) HCA. The building would visually dominate the corner site as an obtrusive</p>

General Design Provisions	Comment
	modern architectural expression and provide an inappropriate visual entrance and setting to that of the surrounding HCA which has traditional materials and finishes of early 20 th century character. Red face-brick should be incorporated as the main external finish with PC cladding of neutral colours restricted for use to feature elements only. No concerns are raised to the use of colorbond metal sheet roofing as it permits the low pitch roof design which reduces the overall height of the building.
Fenestration	No concerns are raised on the use or composition of modern fenestration and associated awnings. It reflects the purpose of the building to be a modern educational facility.
Landscaping	No concerns are raised to the proposed landscaping works. The new surface areas and plantings proposed are appropriate for the intended use of the site and complement the existing native landscaping. Retention of the playing fields is also an appropriate low scale use of the south-west corner of the site bordering onto the local heritage item No. 746 (House) and the residential portion of development with the HCA.

Tree Removal

Refer to comments provided by Council's Tree Management Officer for acceptable impact on the landscape features on site to preserve the existing landscape, facilitate the proposed development and requirements to meet Council's Offset Planting Code.

Summary

In summary, heritage concerns are raised to the proposal in its current form. The proposal and supporting documentation fails to demonstrate alternative options to acquire further land around the site to retain the existing low scale character of development, to demonstrate alternative options to preserve the two primary significant buildings (Buildings A and J) located on the subject site which are contributory to the values of the HCA. Aesthetic refinements are also required in relation to the bulk, height, scale, fenestration, materials and finishes to enable the new building to sympathetically respect the visual setting and significant qualities of the Wahroonga (North HCA).

Conclusion

Council raises objections to the proposal on the following heritage grounds:

1. Demolition of Buildings A and J are inappropriate having regard to Part 9.3.10 of the *HDGP* and would have a detrimental impact on the contribution of the Waitara Public School to the HCA. Alternative locations for the New Learning Centre or relocation of Building J should be investigated to preserve the built heritage values of the site in conjunction with the ecological values of the heritage listed trees.
2. The proposed height, bulk and scale of the new Learning Centre is inconsistent with Part 9.3.10 of the *HDGP*. Further acquisition of adjacent land should be investigated to provide sufficient justification to proceed with the current proposal opposed to the heritage conservation controls for the site. Should further acquisition of land prove not to be feasible, the bulk and scale of the north and west elevations should be reduced by stepping the building in at the top level. This would reduce the level of impact on the Wahroonga (North) HCA.
3. Further articulation should be introduced to reduce the overt building scale in respect to the surrounding low scale built environment. The sky blue square protruding element is an unsympathetic dominant feature which highlights the excessive bulk of the building and should be deleted.
4. The proposal is inconsistent with Part 9.3.1 of the *HDGP* requiring new materials to complement the period and style of the conservation area. The proposed use of PC cladding and introduction of

colour (sky blue) would have an adverse visual impact on the collective visual catchment of the building stock of the Wahroonga (North) HCA. Red face-brick should be incorporated as the main external finish with PC cladding of neutral colours restricted for use to feature elements only.

Vegetation

The vegetation on the site is mapped as Sydney Turpentine Ironbark Forest (STIF) which is listed as Critically Endangered under the *Commonwealth Environment Protection and Biodiversity Conservation Act 1999* and an Endangered Ecological Community under the *NSW Threatened Species Conservation Act 1995*.

Council's Natural Resources Team advise that the proposal is unlikely to have a significant impact upon species, populations and communities listed under the *Biodiversity Conservation Act 2017*. However, it is recommended that the Landscape Plan be amended to include additional plantings of locally indigenous Sydney Turpentine Ironbark Forest EEC species (trees, shrubs and groundcovers) to enhance the habitat corridor where it is considered its passive use is unlikely to contradict future child safety concerns. The area of focus would be the northern and eastern boundaries of the site.

It was observed that some of these areas have native soil seedbank intact, and therefore, could also be regenerated using bush regeneration techniques in addition to supplementary planting.

These landscaping amendments would offset cumulative impacts of previous approved tree removal permits/DAs as well as the impacts of the current proposal.

Setbacks and Open Space

The Hornsby Development Control Plan applies to the site. Part 7 of the DCP provides Desired Outcomes and Prescriptive Measures for Educational Establishments.

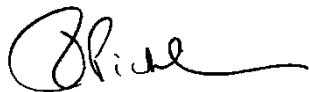
The DCP prescribes that front building setbacks should be 6m to local roads and 9m to designated roads. Edgeworth David Avenue is a designated road and Myra Street a local road. Recreation space should be provided on-site at a minimum rate of 20m² per student. Educational establishments should also incorporate set down / pick-up areas and provision of bus services for students.

Traffic and Parking

- The Traffic Impact Assessment (TIA) prepared by GHD states there will be an increase from 32 full time staff to 42 full time staff. The provision of parking for full time staff is 1 parking space per full time teacher in accordance with Hornsby DCP. The TIA has assessed the parking provision for full time staff with a rate of 1 parking space per 3.5 full time teachers using the ratio of existing number of parking spaces and full time teachers. Council does not accept this method of determining the provision of parking and should be calculated in accordance with Hornsby DCP. Provision for 2-3% of the total number of parking spaces to be accessible parking spaces in accordance with Hornsby DCP *Table 1C.2.1(f) Accessible Car Parking Provision*.
- The TIA suggests, "*The school could benefit from pedestrian crossings that exist outside school entrance/exits, on Myra Street and Edgeworth David Avenue.*" Council has concerns with the traffic flow if a signalised pedestrian crossing is installed at the school gate access on Myra Street due to the close proximity with the existing traffic signal intersection of Edgeworth David Avenue/Myra Street. Council's Traffic and Road Safety Branch suggests a pedestrian crossing facility on Myra Street to be located south towards Park Lane. Any pedestrian crossing facility being proposed in conjunction of the proposed redevelopment of Waitara Public School is subject to relevant RMS warrants.
- Highlands Avenue is currently used as an alternative pickup/drop off operation during school peak periods. Consideration be given to providing formal cul-de-sac bulb at the end of Highlands Avenue (School Staff Car Park Entrance).
- Any classes for students with special needs will require dedicated pick up/drop off parking spaces provided onsite.

Should you wish to discuss this matter further, please contact Council's Manager Assessment Teams, Mr Rod Pickles on telephone 9847 6731.

Yours sincerely



R PICKLES
Manager Assessments
Planning Division

TRIM Reference: D07416305
P2009/00923