



File Ref: SSD-10371

3 June 2020

Department of Planning & Environment  
320 Pitt Street  
Sydney NSW 2000

Dear Mr Gostsis,

**New Request for Advice on EIS – Trinity Grammar School Redevelopment (SSD-10371) (Inner West)**

**Proposal: Trinity Grammar School – Summer Hill Campus The ‘Renewal Project’**

Property: 113 – 119 Prospect Road, Summer Hill Lot 11 DP 1171965

Council has reviewed the submitted information and makes the following comments:

Transport & Accessibility Assessment

Council has undertaken a review of the transport and accessibility assessment and notes that it lacks detail on the proposed infrastructure measures required to ameliorate the impacts on road safety and traffic efficiency of the development as required by the SEARS.

The provided transport and accessibility assessment should be updated to include measures proposed to ameliorate impacts. A list of works that should be considered are:

- I. The upgrading of the existing pedestrian crossing in Prospect Road to a raised pedestrian crossing
- II. Widening of the island at the intersection of Old Canterbury Road and Prospect Road to provide a refuge island so as to improve safety of pedestrians at the intersection.
- III. The relocation of the existing electrical kiosk at the main vehicular access location in Victoria Street as the current location severely impacts sight distance.
- IV. The improvement of the poor sections of asphalt footpaths in Prospect Road, Seaview and Victoria Streets to improve pedestrian and cyclist safety.

Maintenance and Delivery Area

*Victoria Street*

The new maintenance and delivery area will be via the southern driveway in Victoria Street. It is proposed that the “left out only” restriction at this driveway be removed so as to allow for heavy vehicles to turn right when leaving the site. No objection is raised to this measure provided the restriction is removed only for heavy vehicles.

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The other measure proposed at the southern driveway is to remove the adjacent traffic island to allow delivery vehicles to turn left out of Harland Street into Victoria Street and then a quick right into the southern driveway. The traffic island proposed to be removed is in fact a pedestrian refuge and its removal is *not supported*. The removal of this refuge will severely impact pedestrian safety as it is adjacent to the main southern driveway whose use is being intensified and which has poor sight lines for and of pedestrians and vehicles due to the existence of an electrical substation adjacent to the driveway.

Delivery vehicles should only access the driveway by turning left in.

## *Seaview Street*

No objection is raised to the new delivery/ loading bay accessed from Seaview Street, subject to the concerns raised under subheading Seaview Street Streetscape below being addressed and resolved.

## *Delivery Hours*

Both delivery bays should have time restrictions placed upon them, with regards to when delivery trucks are permitted to deliver goods and access the site. The approved hours should be outside the proposed hours of drop off and pick up for students to ensure minimal disruption to the traffic for the locality, but also allow for the amenity of the surrounding residential area.

## Seaview Street Streetscape

The proposal seeks consent for the demolition of at least four (4) existing dwellings along Seaview Street and the construction of a new Maintenance Building and a loading dock for deliveries. The plans fail to provide sufficient details with regards to the development along Seaview Street. Critical information such as detailed elevations and streetscape analysis have not been provided and therefore a comprehensive assessment of the impacts of the proposal on Seaview Street cannot be made. Additional information regarding the proposed maintenance building and streetscape analysis for Seaview Street must be provided to enable a detailed assessment.

Notations outlined on the plans outline that the applicant wishes to construct a 2m high acoustic wall along Seaview Street. While construction of such a wall would improve acoustic amenity for neighbours, it is expected to result in a poor urban design/streetscape outcome and will offend CEPTED principles. The installation of a 2m high wall on along the street is also likely to attract vandalism and graffiti and will diminish the character of the area. Council raises significant concerns with the future passive surveillance to Seaview Street and the resulting streetscape.

## Carparking

The revised car park design has included measures to remove car spaces with access along the main circulation road so as to minimise the likelihood of a vehicle on the circulation road being delayed by a vehicle manoeuvring into or out of a parking space. The loss of car parking is not supported.



A better approach would be to restrict the use of these car spaces during pick up and drop off times while still making them available during other times including after hours and weekends for out of school hours activities such as sporting events. One option would be to make these spaces “staff only” and managed in such a way that they were not used during pick up and drop off times.

### Plan Of Management

The provided Plan of Management should be updated to include details about out of hours activities. This information should cover any concerts or events to be held at night or on weekends. Details such as finishing times, potential patron numbers and material on where to park should be provided.

### Heritage Impacts

The heritage advice prepared to support this SSD does not meet Inner West Council’s requirements for Statements of Heritage Impact and consequently does not meet the LEP aims for conserving the environmental heritage of the LGA.

The supporting heritage and aboriginal heritage assessments have largely been compiled from secondary sources and neither document contains adequate documentary or physical research regarding the original landscape form. The reports do not demonstrate an understanding of the design and character of the sequence of significant buildings and associated landscaping and quadrangles progressively erected to create the school campus. This sequence of development including buildings and landscaping created for four different educational users including the private school, the NSW Department of Public Instruction (later Department of Education) and the Anglican Church is potentially of state significance. The architects of the various phases include the most significant designers of school buildings in the State.

The conclusions of the HIS are not supported by Inner West Council’s Heritage Specialists. Today interwar and post war works of architecture and landscape are also considered to be of cultural significance, and should have been assessed in relation to both the Collegiate Gothic and Tudor Revival tradition in School Architecture in Australia and in terms of the introduction of modern architectural trends in School Architecture (based on criticism of using historic motifs for the chapel in the mid 1950s).

Inner West Council had established the heritage significance of three elements within the complex: the Chapel; the Headmaster’s Residence and the gates in its Ashfield Heritage Study and the listings also mention the quadrangle. This inventory was undertaken in 1991-92 for Council by highly respected heritage consultants however the listing information has not been included in the SSD application (despite being provided by Council’s heritage specialists).

The Heritage Assessment does not contain sufficient documentary or physical evidence to support a change in the level of significance from that ascribed by the leading Australian Architectural Historian and expert on the architectural character of the Inner West, the late Robert Irving in association with Godden Mackay P/L. The inventory sheets which set the

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attributes and levels of significance should have formed the basis of any assessment of the site. The designers have not been identified or their context and influence on the development of collegiate and modern school architecture in Australia identified. The assessment of John Horbury Hunt's work is also not supported as it is not based on the published studies of his work by Peter Reynolds et al.

The opportunities for the retention of the residence in Seaview Street listed as being Contributory 1 in the proposed Trinity School Estate should be investigated (No. 48 Seaview Street).

As no detailed research has been undertaken regarding the development of site, the HIS does not contain sufficient information to assess the heritage impact of the current proposal on the buildings and landscape dating from pre 1965 likely to be of aesthetic and historic significance. Buildings identified as being of cultural significance should be adaptively reused and not demolished. This more sustainable approach to the treatment of the built environment is now being promoted by Australian ICOMOS and there is a new guideline to the Burra Charter that has not been considered by the heritage consultants. Buildings with little or no cultural significance that are not suitable of being adapted can be replaced with new facilities.

It is recommended that a staged approval be given so that selected works can continue to the sections of the site where buildings dating from pre 1965 are proposed for demolition and that that more detailed heritage advice be prepared to more adequately assess the cultural significance of the interwar and post war buildings on this campus, including identifying the architect and date of construction of each block or residence to Seaview Street and its associated landscape features or quadrangles. A more detailed CMP should be prepared that contains historic research and a more detailed physical analysis of the building stock and landscape undertaken. The proposed works to the existing buildings can then be assessed against the findings of this CMP in a revised HIS.

It is also recommended that the character of the landscape prior to any alteration as part of European settlement be undertaken, to determine that nature of 'country', to form part of the Aboriginal Assessment.

## *Heritage Recommendations:*

- Staged Approval

A staged approval should be granted, with works to the post 1965 buildings that are to be replaced approved initially. Works to the pre 1965 buildings and landscaping should be reassessed following the preparation of a more comprehensive Conservation Management Plan that clearly identifies all of the phases of development as the site is potentially of state heritage significance.

- Revised Conservation Planning Documents

As the site is potentially of state significance, additional heritage advice is to be prepared including a CMP and a revised HIS and the final design of the alterations to the pre 1965



buildings is to reflect this additional detailed heritage advice. These documents are to be prepared to the satisfaction of Inner West Council's Heritage Specialists.

The CMP is to include:

1. Phases of development plans are to be prepared, including an analysis of the landscape and quadrangles before any building or levelling work took place. Surveys prepared by the Surveyor Generals' Department and the Public Works Department are to be utilised to determine landscape character.
2. More research is to be undertaken to determine the date of construction and the architect of each building and these are to be identified on the phases of development plan, including demolished buildings.
3. A comparative assessment is to be undertaken that illustrates examples that demonstrate that there are more significant examples of evolution of Collegiate Gothic or Tudor Revival and the transition to modern school architecture than this site. The architects of these buildings are to be identified. The comparative analysis is to include buildings of the same building type: eg chapels and headmaster's residences.
4. A second opinion regarding the significance of the interwar and post war buildings should be sought from an expert on the development and design of educational buildings in Australia.
5. Buildings identified as being of cultural significance should be adaptively reused not demolished as this is a more sustainable approach to the treatment of the built environment. Buildings with little or no cultural significance can be replaced with new facilities.
6. More detailed diagrams are to be prepared showing the levels of significance of the buildings, including contributory buildings in Seaview Street. Buildings identified as being of cultural significance should be retained and adapted, retaining evidence of their layout, significant fabric and spaces.

A revised assessment of heritage impact is to be prepared that can be supported by documentary and physical research and reflects the levels of significance already established in the Ashfield Heritage Study in particular:

7. The levels of significance from the Ashfield Heritage Study listing are to be utilised for the Chapel, Headmaster's Residence and the gates.
8. The draft Trinity Grammar School Estate HCA listing is to be considered in the revised HIS.
9. Additional research is to be undertaken to determine the provenance of the relocated gates.
10. The impact of the proposed development on the surviving twentieth century buildings on the site is to be considered, once their significance has been adequately assessed in the CMP.
11. The impact of the development on views towards Summer Hill from a distance and on distance views from the first floors of adjacent Victorian era villas in Victoria Street that are now heritage items is to be identified.



If you need any further assistance in relation to the above matters please contact Council's Development Assessment Officer Conor Wilson on 9392 5997 or email [conor.wilson@innerwest.nsw.gov.au](mailto:conor.wilson@innerwest.nsw.gov.au).

Yours faithfully

A handwritten signature in black ink, appearing to be "LM" or similar initials, written in a cursive style.

Luke Murtas  
**Manager Development Assessment**