

LINDFIELD LEARNING VILLAGE

RESPONSE TO SUBMISSIONS - BUILT HERITAGE

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INTRODUCTION

This report has been prepared by Urbis Heritage on behalf of the NSW Department of Education and School Infrastructure NSW (the Applicant). It sets out responses to the agency and public submissions relevant to State Significant Development Application (SSD 16_8114) for Lindfield Learning Village (the site).

The subject site is located on Eton Road in Lindfield and is identified as an item of local heritage significance by Ku-ring-gai Council, item: I422 (Ku-ring-gai Local Environmental Plan 2015). It is also under consideration for listing on the State Heritage Register.

On 24 October 2018 the Minister for Planning granted partial development consent to SSD 8114 for Phase 1 construction and operation of a new school for 350 students. The remainder of SSD 8114 (as originally proposed) has not yet been granted consent and has been subject to further investigation, assessment and engagement with the relevant agencies (DPE, RFS, OEH, RMS, TfNSW) and Council.

The Response to Submissions and supporting documents seek approval for the remainder of SSD 8114, being:

Phase 2(b) of construction:

- Works to accommodate 1,050 students (including the approved 350).
- Repurposing of the Phase 1 area.
- A driveway extension for buses and drop off and pick up vehicles.

Phase 3 of construction:

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

This report is an addendum to both the Heritage Impact Statement (HIS) prepared in June 2017 and the Response to Submissions Report prepared by Urbis in September 2019. Reference should be made to the HIS for an assessment of the impact of the proposed works originally proposed under the SSD. Refer to the Conservation Management Plan prepared by Urbis in November 2018 and updated in April 2020 for a full description, history and assessment of significance for the site.

In additions to the public submissions, submissions from the following agencies have been addressed in this report:

- NSW Heritage Council
- Ku-Ring-Gai Council
- Dunstan Grove Strata

1. METHODOLOGY AND PROPOSED WORKS

This report has considered the issues raised by agencies and the public during the exhibition of SS8114 (Phases 2 and 3).

Key changes to the plans in response to the agency and public submissions which are relevant to heritage are outlined below:

- The previously proposed penetration through the slab in Zone F Level 4 courtyard has been omitted from the design.
- The design of the proposed opening through the concrete wall adjacent to the spiral stairs near Level 4 entrance to Stage 2 has been altered. The extent of the opening has been reduced by 50%. The area immediately adjacent to the staircase would be retained in its entirety and the opening to achieve light penetration through the building would be confined to the area to the north.
- The design of the extended driveway has been altered. After extensive testing by numerous disciplines design 4 has been determined to be the most successful.
- Colour palette for the COLA has been amended to be more contextual.

The below architectural plans have been referenced in the preparation of this report:

- DA-2-000 COVER SHEET D
- DA-2-100 SITE PLAN C
- DA-2-101 INDICATIVE CONSTRUCTION MANAGEMENT PLAN D
- DA-2-102 PHASE 1-3 SITE PLAN C
- DA-2-103 LOT BOUNDARY PLAN B
- DA-2-120 CONSTRUCTION STAGING PLAN - LEVEL 0 B
- DA-2-121 CONSTRUCTION STAGING PLAN - LEVEL 1 C
- DA-2-122 CONSTRUCTION STAGING PLAN - LEVEL 2 C
- DA-2-123 CONSTRUCTION STAGING PLAN - LEVEL 3 C
- DA-2-124 CONSTRUCTION STAGING PLAN - LEVEL 4 C
- DA-2-125 CONSTRUCTION STAGING PLAN - LEVEL 5 C
- DA-2-126 CONSTRUCTION STAGING PLAN - LEVEL 6 C
- DA-2-127 CONSTRUCTION STAGING PLAN - LEVEL 7 C
- DA-2-128 CONSTRUCTION STAGING PLAN - ROOF C
- DA-2-200 PHASE 2 & 3 - PROPOSED FLOOR PLAN LEVEL 0 B
- DA-2-201 PHASE 2 & 3 - PROPOSED FLOOR PLAN LEVEL 1 D
- DA-2-202 PHASE 2 & 3 - PROPOSED FLOOR PLAN LEVEL 2 D
- DA-2-203 PHASE 2 & 3 - PROPOSED FLOOR PLAN LEVEL 3 D
- DA-2-204 PHASE 2 & 3 - PROPOSED FLOOR PLAN LEVEL 4 D

- DA-2-205 PHASE 2 & 3 - PROPOSED FLOOR PLAN LEVEL 5 D
- DA-2-206 PHASE 2 & 3 - PROPOSED FLOOR PLAN LEVEL 6 D
- DA-2-207 PHASE 2 & 3 - PROPOSED ROOF PLAN C
- DA-2-300 NORTH & SOUTH BUILDING ELEVATION C
- DA-2-301 EAST & WEST BUILDING ELEVATION C
- DA-2-400 BUILDING SECTIONS - SHEET 1 B
- DA-2-401 BUILDING SECTIONS - SHEET 2 B
- DA-2-901 BUILDING PERSPECTIVES C

The below landscape plans have been referenced in the preparation of this report:

- LA-2-0000 F NTS TITLE SHEET
- LA-2-0001 F NTS CONTENTS PAGE
- LA-2-0002 F NTS INTRODUCTION
- LA-2-0003 F NTS PRINCIPLES
- LA-2-0004 F NTS SITE PHOTOS
- LA-2-0005 F NTS LANDSCAPE ANALYSIS
- LA-2-0006 F 1:250 LANDSCAPE MASTER PLAN SOUTH
- LA-2-0007 F 1:250 LANDSCAPE MASTER PLAN EAST
- LA-2-0008 F NTS CIRCULATION DIAGRAM
- LA-2-0009 F NTS WSUD DIAGRAM
- LA-2-0010 F 1:100 LANDSCAPE BLOW UP PLAN 1
- LA-2-0011 F 1:100 LANDSCAPE BLOW UP PLAN 2
- LA-2-0012 F 1:100 LANDSCAPE BLOW UP PLAN 3
- LA-2-0013 F 1:100 LANDSCAPE BLOW UP PLAN 4
- LA-2-0014 F 1:100 LANDSCAPE BLOW UP PLAN 5
- LA-2-0015 F 1:100 LANDSCAPE BLOW UP PLAN 6
- LA-2-0016 F 1:100 LANDSCAPE BLOW UP PLAN 7
- LA-2-0017 F 1:100 LANDSCAPE BLOW UP PLAN 8
- LA-2-0018 F NTS SHELTER DESIGN
- LA-2-1000 F 1:1000 SECURITY FENCE MASTER PLAN
- LA-2-1001 F 1:250 SECURITY FENCE PLAN 1
- LA-2-1002 F 1:250 SECURITY FENCE PLAN 2
- LA-2-1003 F 1:250 SECURITY FENCE PLAN 3

- LA-2-1004 F 1:250 SECURITY FENCE PLAN 4
- LA-2-1005 F 1:250 SECURITY FENCE PLAN 5
- LA-2-2000 D AS SHOWN LANDSCAPE DETAILS
- LA-2-3000 D NTS PLANTING PALETTE

2. OVERVIEW OF HERITAGE SIGNIFICANCE

The significance of the subject site and its component elements are set out in the Conservation Management Plan prepared by Urbis (November 2018, interim update April 2020). The Statement of Significance has been reproduced below.

2.1. STATEMENT OF SIGNIFICANCE

Lindfield Learning Village is of state heritage significance for its historic, aesthetic, associative, social and representative values, and for its rarity. It is also of research potential at a local level.

The Lindfield Learning Village is of historic significance at State level, primarily due to the important role of the Campus in the development of Australian Architecture in the second half of the twentieth century, and the role of the Campus in the development of Australian landscape design, and an appreciation for natural bush settings associated with the influential Sydney School. The Campus also influenced the design of educational buildings, with an emphasis on spatial planning to create a social environment. The Campus is also historically significant for its place in the development of teachers' education in NSW, and is representative of the substantial investment by State and Federal Government into Higher Education in the 1960s and 1970s. The Campus also has historical significance at a local level, for the role the Campus has played in education on the North Shore. The alterations to the campus in 2018 responded to a unique new education philosophy and demonstrate the changing nature of education in the 21st century.

The Lindfield Learning Village has significant associations with important government and private practice architects and landscape architects, including David Turner and Peter Stronach. The original associations with Bruce Mackenzie and Alan Correy are particularly important, as the Campus retains the ability to clearly illustrate the landscape design and construction techniques closely associated with the work of these influential landscape designers. The site is a major example of the application of Mackenzie's philosophy of building carefully within a pristine natural environment rather than starting with a cleared site and creating an 'artificial' natural landscape.

The Lindfield Learning Village has a high level of aesthetic significance, arising from the natural bushland setting, the buildings themselves and the landscape design and has won several awards including the Sulman Medal in 1978, a 1972 RAI Merit Award and a Royal Australian Horticultural Society Award for Bush Landscape Design. The Campus is a seminal example of the Neo-Brutalist style in Australia, moderated by the influence of the Sydney School of architecture and the landscape design philosophies of Bruce Mackenzie and Alan Correy. Removal of some of the surrounding vegetation due to bushfire requirements has been undertaken however the integration of the buildings with the natural bushland setting and topography of the site remains particularly significant. The campus was originally influential in the design of educational buildings, with an emphasis on spatial planning to create a social environment for students and staff. The campus has now been adapted to respond to a new model of education in 2018 and represents the changing approaches to education in the 21st century.

Former staff and students of the Lindfield Learning Village, during its time as various tertiary institutions have a special association with the site from working and studying at the unique site. The significance to the community is continued through the ongoing education use of the place facilitated by its reuse as a K-12 school. The entry of the Campus on the Royal Australian Institute of Architects' Register of 20th Century Heritage, and nomination for State Heritage Register listing, indicates an appreciation for the site in terms of its significance for the development of Australian architecture and landscape architecture in the second half of the twentieth century.

The Campus is both a representative example of the design influences present in the building and its landscaped setting, and also rare in the combination of Neo-Brutalist and Sydney School influences on such a scale and with such a high degree of success. The presence of protected, rare, vulnerable and uncommon indigenous plant species in the vegetation of the site and its surroundings adds to the rarity value

3. RESPONSE TO AGENCY SUBMISSIONS

3.1. INTRODUCTION

Following the submission of the application for Phases 2(b) and 3 a number of agency submissions were received. The agency submissions relevant to this response include those from Ku Ring Gai Council and those from the NSW Heritage Council.

Each of the comments have been addressed below in this section. Agency comments are set out in bold and a response by Urbis Heritage directly below each.

3.2. HERITAGE COUNCIL SUBMISSION

The following comments and recommendations were received from Cheryl Brown, as delegate of the NSW Heritage Council (13/12/2019).

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.

Urbis Heritage Response:

Noted.

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 the building within its bushland setting.

Urbis Heritage Response:

Noted. Please however note that an amended design for the extended driveway has been developed which Urbis understands better responds to the traffic constraints associated with the site. This option also does not require any amendment to the significant rock cutting under the Stage 3 link. The proposed driveway design is assessed as having an acceptable heritage impact however please see further discussion under Section 3.4 below.

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.

Urbis Heritage Response:

Noted. Please note however that the option for the extended driveway has been amended (refer Section 3.4) below. The demolition of the link between Stage 1 and 5 is no longer required to accommodate the extended driveway. It is still required to facilitate access by firefighting and emergency vehicles. However, for the reasons outline by the delegate in the agency submission, the heritage impact of the works is assessed to be acceptable.

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 include 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.*

Urbis Heritage Response:

DesignInc have endeavoured to make contact with Bruce Mackenzie for the purpose of workshopping the final landscape plans. Contact was made on the below dates however the offer of a meeting to finalise the Phases 2(b) and 3 landscaping was not accepted.

- 22 October 2018 confirmation from Design Inc that they had called Bruce MacKenzie to explain the RFS requirements and the adjusted design for Partial School.
- 22 October 2018 email from Bruce MacKenzie to Emma Viljoen regarding tree removal.
- 24 October 2018 email from SINSW explaining the tree removal requirement at LLV.
- 23 January 2020 email to Bruce Mackenzie from Designinc (BMD) introducing Landscape Architect Steven Holmes and requesting a meeting asap to provide an update on the project and discuss collaboration moving forward.
- 28 January 2020 Email response from Bruce Mackenzie (BMD) to Designinc on the with images and summation of his experience on the project and a decline to collaborate moving forward.
- 10 February 2020 Response email back to Bruce Mackenzie (BMD) from Designinc with detailed information from Sandeep Amin responding to Bruce's comments.
- No further emails or correspondence

The below key design changes to the landscape plans (including those around the extended driveway) have been made.

East

- The new bus turnaround area is intended to tie in with the existing levels as much as possible while achieving compliant grades.
- The landscape design includes planting pockets on the embankment sufficient to accommodate three new Eucalypt species as part of the proposal.
- The proposal aims to screen the underside of the road / engineering supports to the new cantilevered road with groups of 20 or so tensioned vertical cables at 4-8m centres for climbing plants. To achieve appropriate growing conditions for the climbers, a circular terraced garden bed (or multiple beds) is proposed at the base of the slope and to the radius of the road above.

- Further pockets/groups of planting will be proposed within the void (teardrop shape) in accordance with the bushfire conditions.

South

- The extended driveway and associated footpaths have a wider footprint than the Exhibited Phases 2 and 3 design and there will be an increased drop from road to landscape below. The exhibited scheme involved a change in level of approximately 0.5m to 1.5m and it is now between 1m to 2.5m, increasing the overall height of the sandstone terraced walling that mitigates the change. 'Fire tolerant' native grasses such as Lomandra are proposed between the walls to soften the impact of the road and further prevent the terraces as visual spaces rather than play areas.
- Black powder-coated vertical post fencing is proposed on both sides of the extended driveway, eliminating access to the change in level. Black is considered to be appropriate in the context and has been used elsewhere on the site.
- The new turning head further increases the change in level between the extended driveway and lower play space. Circular sandstone log terracing is proposed with plants in between to prevent access from the road.
- There have been some changes to the WSUD / water movements. Similar to the exhibited scheme there will be a bio swale immediately adjacent to the road, becoming circular at the turning head. Water captured in the swale will be piped to the lower playspace and run through vegetated swales to control ponds on the southern boundary. The peripheral swale system will largely remain intact with little change.
- There is little change to the nature play/parkour trail to the south of the site. This remains to the very south of the area to maximise the open playspace
- Open areas for future activity in the space has been achieved with areas of broken lawns interspersed with rock outcrops where at surface level and retaining some low value native understorey vegetation where feasible. The lawn areas will be framed by loose rough rock, groups of native grasses, areas of deco sandstone and naturalistic vegetated swales with sleeper crossings.
- The shape of the paths and lawn spaces are now more organic in response to the circular turnaround area and agency comments regarding formality of proposed landscape.
- The fire trail to the west of the turning circle will be utilised as a play space, effectively acting as a threshold between the COLA and the lower play space. As a result of the new fencing arrangement children will now be able to move freely between the upper and lower areas. A number of robust surface treatments are proposed including standalone circular coloured concrete with games line-marked and minimal areas of reinforced turf, deco sandstone and boulders to the outside of the core fire trail.
- The playspace to the immediate west of the COLA includes a change to the path orientation and adjustment to the location of the vegetable plots. Trampolines within the deck will remain.
- 3 new trees are proposed to the east of the building to offset some of those being removed as part of the driveway extension.

Please refer to a selection of precedent images below which indicates the intended organic nature of the landscaping (including shade structures).



Figure 1 – Stabilised crushed sandstone for circulation.



Figure 2 – Open lawn/passive recreation



Figure 3 – Natural colour climbing holds.



Figure 4 – Agility trail component.



Figure 5 – Perforated shade structure (Cove Matt Natural colour).

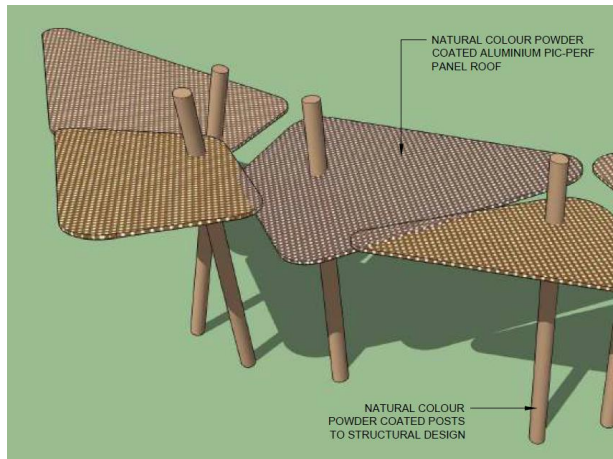


Figure 6 – Shelter design.

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.

Urbis Heritage Response:

Noted. The final state of Phase 1 exemplifies how the fire shutters can be implemented in a sympathetic way. None of the Phase 1 shutters are easily visible from any perspective. Urbis would provide ongoing oversight in relation to the development of shop drawing for all fire shutters.

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.***

Urbis Heritage Response:

It is appreciated that the fabric that the proposed fenestration will remove is assessed to be significant fabric. However, there is assessed to be sufficient fabric remnant in the expansive southern façade of the building to demonstrate the original character of the building.

The original monolithic design of the building is appreciated and has been retained in the overall design of LLV. However, the building and the surrounding landscape is to be used in parallel on a daily basis in accordance with the new use as a primary and secondary school. Therefore, opportunities to increase the permeability from the surrounding area have been sought in appropriate areas.

The design team is cognisant of the highly significant fenestration pattern throughout the building which is also largely characterised by concrete window hoods. Priority has been given to ensuring that the presentation of this fenestration is almost entirely retained. The south façade of the building at Level 1 conversely comprises no individually distinctive features, rather it comprises one of two materials (brick) which characterises the building overall. The expanses of this retained fabric in all other parts of the building are considered to be sufficient to demonstrate the original and highly significant character of the building. Further, it is not proposed to introduce any materials in this area which are not already present on the site, as such the fundamental palette of materials will be retained.

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.***

Urbis Heritage Response:

This area of demolition has been omitted from the design.

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.

Urbis Heritage Response:

Noted.

9. Refurbish existing planters

The proposed installation of drainage systems and replacement of damaged tiles is consistent with the CMP and can be supported.

Urbis Heritage Response:

Noted.

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.

Urbis Heritage Response:

Noted.

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.

Urbis Heritage Response:

Noted.

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.

Urbis Heritage Response:

The design of the proposed opening through the concrete wall adjacent to the spiral stairs near Level 4 entrance to Stage 2 has been amended. The extent of the opening has been reduced by 50%. The area immediately adjacent to the staircase would be retained in its entirety and the opening to achieve light penetration through the building would be confined to the area to the north.

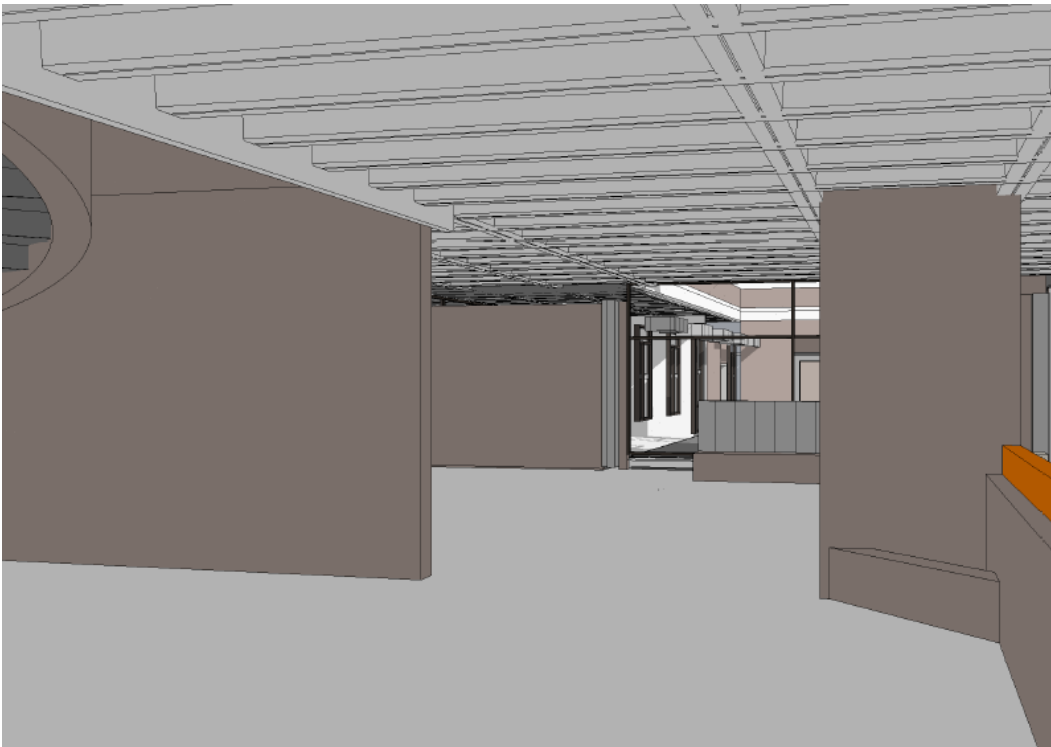


Figure 7 View towards new opening from Level 4 entry showing 50% reduced size of opening.

Source: DesignInc

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

Urbis Heritage Response:

Substantial testing has been undertaken to investigate alternative locations for the reception. Urbis does continue to acknowledge the impact stated above however as per the below this is an operational requirement and the least impactful solution. Please refer to the following statement prepared by DesignInc on behalf of SINSW which outlines the requirement for the reception:

The building is of a large nature and has three main points of entry, one being in Stage 1 where a reception is currently located. The second entry point is to the south where buses will be dropping children off in Zone N and the access will be through Level 2 of Zone N building or the adjacent courtyard to gain entry into the building. The third point of access which was used for the UTS is on Level 4 which has a large feature staircase which leads students, teachers & visitors from the upper or lower car park into the core of the building. This third point of entry will become more popular in Stage 2 as the Homebases and associated classrooms are in closer proximity to this and it is also the closest point of entry to the two lecture theatres which may be used for external events.

Schools have a high level of security requirement which the Department of Education's Security Unit endorse. To have an unoccupied & unmonitored point of access from the public domain would be a huge security risk to the school. The School have outlined the importance of this reception and associated air lock as 'a critical safety issue to have administration staff at this major entry point to the school. This will

be the entry for students and we will be directing the public and parents to the entry on level 5. All other student services will be co-located with the admin at the level 4 entry. It would be extremely problematic from an operational perspective for us not to have admin in this location. The secure entry and air-lock are critical for student safety.'

3.3. HERITAGE COUNCIL RECOMMENDED CONDITIONS OF CONSENT

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.

As per Phase 1 Urbis would be engaged throughout the entire design development, tender and construction process.

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.

As per Phase 1 Urbis requests that the condition be further amended as follows:

Changes which have the potential to reduce the cultural significance of the place should be designed to be reversible where possible.

The proposed works facilitate the ongoing use as an education facility and safeguard the significance of the use. It is necessary to carry out interventions to the building in order to reasonably function as an educational facility.

Urbis notes that there is an opportunity to remove additions and reconstruct removed elements if required in the future, however 'reversibility' traditionally implies that the altered element or fabric can be restored to its original condition, for instance removed fabric may be able to be salvaged and can be reused in the building if required. This will not be the case for the removal of non-significant elements of the site or the interventions into to concrete at Level 4 (or as discussed previously, any removed trees). However, both of these proposed elements have undergone rigours testing to appropriately locate the new openings and to reduce the size of the openings where possible. These, as set out in the previous submission will have an impact on fabric which will be irreversible without reconstruction however, both have been deemed as necessary to facilitate the operational requirements of the school.

Urbis therefore requests that consideration for this requirement is reflect in the draft Condition. The revision will ensure the new development is able to adequately and feasibly respond to the condition.

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.

The complete schedule has been prepared by Apex Diagnostics (October 2018). It has been appended to Version 2 of the Conservation Management Plan prepared by Urbis (April 2020).

Proposed maintenance works should be guided by appropriate methods prepared by a qualified heritage consultant.

Urbis will continue to guide the maintenance works throughout the implementation of the LLV in the role as 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).

Noted.

The schedule of conservation works prepared by Apex, dated October 2018, and the Interpretation Strategy prepared by Urbis are listed as consent documents.

Noted.

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.

Noted.

The detailed design of fire protection measures must be reviewed and approved by the nominated heritage consultant.

As per Urbis' engagement as Phase 1 Urbis will review all shop drawings for fire protection measures.

3.4. KU RING GAI COUNCIL SUBMISSION

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.

Urbis Heritage Response:

Noted. Refer discussion below.

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. Note: the Urbis CMP is not endorsed by any independent third party such as Heritage NSW (former Heritage Division).

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:

...

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.

Urbis Heritage Response:

This site has had documented traffic congestion issues since its original development. As documented in the CMP in 1984 Ku Ring Gai Council themselves raised the issue of the volume of traffic on Eton Road which they had documented since 1975. Access from Lady Game Drive has been investigated for decades, a solution which would have seen the removal of a higher number of trees than that proposed herein. The original heritage management document prepared by Graham Brookes labels the traffic issues as impossible to address. This was prepared in the context of a rezoning application rather than in the context of detailed plans for the reuse of the main campus building. It is considered however, that additional substantial impacts on the amenity of the surrounding trees is able to be addressed.

ARUP have been requested to set out the requirement for the driveway extension. In summary ARUP have advised that it is necessary to design drop off and pick up areas within the school to ensure there is no substantial impact on the public roads. It is understood that the site would not be able to function for its intended educational use (and that which is deemed to be appropriate in the heritage management documents) without unreasonably impacting on the surrounding environment without this addition.

The CMP prepared by Urbis was written with the express intent of ensuring this important building has a valid, sustainable ongoing use without which it would inevitably fall into disuse and repair. It would be remiss for the document to preclude an amenity which is necessary to see the building utilised for an appropriate use without having further impact on the amenity of the surrounding community. It should also be noted that as an item which is not yet listed in the SHR there is no facility to have the plan endorsed, Urbis did however seek to present the original CMP to Heritage NSW after its completion.

The site has been subject to numerous concept plans including that which saw the complete proposed removal of Stage 3 supported by Graham Brookes(2004) The proposed mixed use of the greater site was met in 2007 by Barry O'Farrell (member for Ku Ring Gai) with intense opposition. It was stated that a mixed use would see a dramatic increase in traffic and if the place is not used for tertiary education then it should be for primary or secondary education. This is exactly what the LLV project has delivered for the main campus buildings including retention of all five original stages. However, it must be acknowledged that the historic traffic issues (which were also acknowledged by O'Farrell) remain and new ones generated by the education use are required to be mitigated to the greatest extent possible.

Urbis has continually acknowledged that the removal of trees (for bushfire compliance and now for the driveway extension) has an impact on the original character of place. It should be noted however that while the original school saw the retention of natural bushland, it did so insofar as it was compatible with the educational requirements of the period and the substantial scale of the proposed building. Figure 212 in the CMP clearly shows large areas of bushland removed in the 1970s to accommodate tennis courts, and oval and a carpark. This clearing and substantial other clearing was undertaken in order to accommodate the use of the site (including the later clearing of areas to the east to accommodate the lower carpark at part of Stage 6 of development). Further substantial clearing of the landscaping was envisaged by Turner in order to achieve an expansion to the south west. It is acknowledged that further clearing of the bushland to the south constitutes clearing areas that were not originally planned to be cleared and has a heritage impact. However, the proposed further clearing is necessary to ensure that the original site constraints which were never remedied are not exacerbated.

The reuse of the building, its heritage significance and the amenity of the community must be reconciled. This is a substantial task which the project team has undertaken over several months while testing the

options for the driveway extension from the perspective of a myriad of disciplines. The points raised by Council are duly acknowledged however the removal of additional trees to assist with the issues outlined above and provide a sustainable use for the site is considered an acceptable impact even in the context of the bushfire clearing. Please refer below for additional commentary of trees to be removed.

Revised Traffic Solution and Arboricultural Impacts

Options to resolve the traffic issues have been workshopped over an extended period. Options for the solution were reviewed by all relevant disciplines within the project team including heritage. It was noted that with each potential option there was a resultant impact on the built fabric/landscape at varying levels.

The proposal has been revised to incorporate a driveway extension (in place of the Loop Road). This option proposes a wider road and turning circle as shown in the image below. It is acknowledged that this is located directly in front of a distinctive façade of the building. While option 1 also requires this separation, it is considered to be more pronounced in option 2 given it would be a two-lane road. It would not however have a detrimental impact on carpark 1 or 2 (note that Carpark 1 is of moderate significance). It would further have no impact on the Dunstan Grove Road Cutting or the form of the main entrance original vehicle drop off.

It is acknowledged that the bus loop to the east of the building would require a substantial cantilevered road. As outlined above it is proposed to screen the underside of the road / engineering supports to the new cantilevered road with groups of 20 or so tensioned vertical cables at 4-8m centres for climbing plants. To achieve appropriate growing conditions for the climbers it is proposed to install a circular terraced garden bed (or multiple beds) at the base of the slope and to the radius of the road above. Further pockets/groups of planting will be proposed within the void (teardrop shape) and in accordance with the bushfire conditions. Although there are no significant views identified from the lower carpark (which was a post 1985 Stage 6 addition to the site) this would assist in visually incorporating the new structures into the landscape.

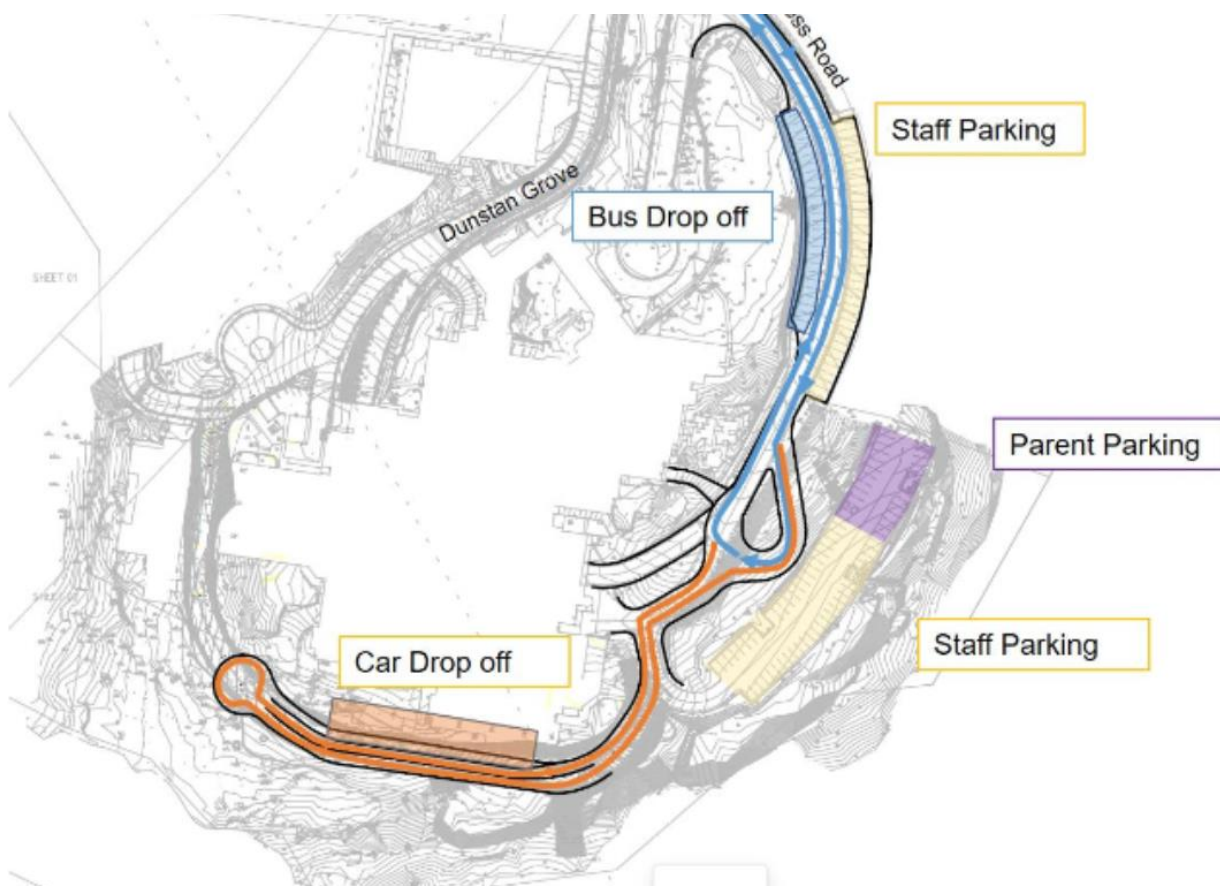


Figure 8 Proposed bus turnaround area.

Source: ARUP

It is acknowledged that the locations and retention value of the 10 trees required to be removed in the previous submission (for Loop Road/landscaping) were not included in the heritage RTS. The number of trees required to be removed in this southern area has been revised to 14 due to the extended driveway design. The relevant mapping from the Arboricultural Report has been appended to this document and further the following Arboricultural retention values are confirmed. Note that the majority of trees required to be removed in this area are those which are in poor health and none of those to be removed due to impacts are of high retention value (most are moderate). The Arboricultural Report has recommended that 10 trees should be replanted on the site to replace these trees. It is a recommendation of this report that there must be further demonstrated investigation into replacing trees on site. It is understood that this will require negotiation with RFS.

- 66 – Moderate
- 68 – Moderate
- 71 – Moderate – High
- 75 – Moderate
- 96 – Moderate – High
- 99 – Low
- 126 – Low – Moderate
- 128 – Moderate
- 139 – Low – Moderate
- 159 – Moderate – High
- 162 – Moderate
- 192 – Low
- 537 – Moderate
- 581 – Moderate – High

In addition to the above the proposed bus turning bay associated with the revised driveway extension will have anticipated impacts on twenty-four (24) trees and will require the removal of twelve (12) trees in addition to those required to be removed in the southern area. It should be acknowledged that this removal would be concentrated in an area which was previously subject to clearing to allow for infrastructure including the two carparks to the east of the building. Further, the trees noted in the plan below closest to the building will be retained and subject to tree protection measures during construction. However, as with all removal of bushland on the site a cumulative detrimental heritage impact is acknowledged in an already denuded landscape.

Refer to the image below which indicates the locations and Arboricultural retention value of the trees to be removed. Note that of the 12 trees in this area to be removed 10 have moderate or lower retention value. Even so, the accompanying Arboricultural Impact Assessment has advised that replenishment is required for twelve (12) trees being removed due to the impacts proposed. The recommended replenishment species include *Eucalyptus saligna* Sydney Blue Gum, *Eucalyptus grandis* Flooded Gum, *Eucalyptus haemastoma* Scribbly Gum, *Corymbia gummifera* Red Bloodwood, *Casuarina glauca* She Oak and *Elaeocarpus reticulatus* Blueberry Ash. DesignInc Landscape has investigated the potential to introduce replacement trees and have confirmed at this stage that at least 3 replacement trees of an appropriate species will be introduced in this area during the works. It is a recommendation of this report that the following Condition of Consent is included in the approval:

Within six weeks of occupation of Stages 2(b) and 3, evidence must be provided to DPIE of further investigation undertaken by the Applicant for replacement tree planting within the site (in addition to the three trees proposed under this application). Where investigations conclude that additional tree planting can be accommodated subject to RFS requirements this is to be undertaken as part of the project.

The retained trees of Moderate-High retention value will be subject to Tree Trunk Protection or Protection fencing. As stated within the Arboricultural Impact Assessment all work within the Tree Protection Zone (TPZ) of retained trees must be under the supervision of an AQF level 5 Arborist and no roots greater than 50mm are to be cut unless given consent. The excavations required for the bus turning bay are to be excavated by hand within the TPZ of retained trees under this supervision.

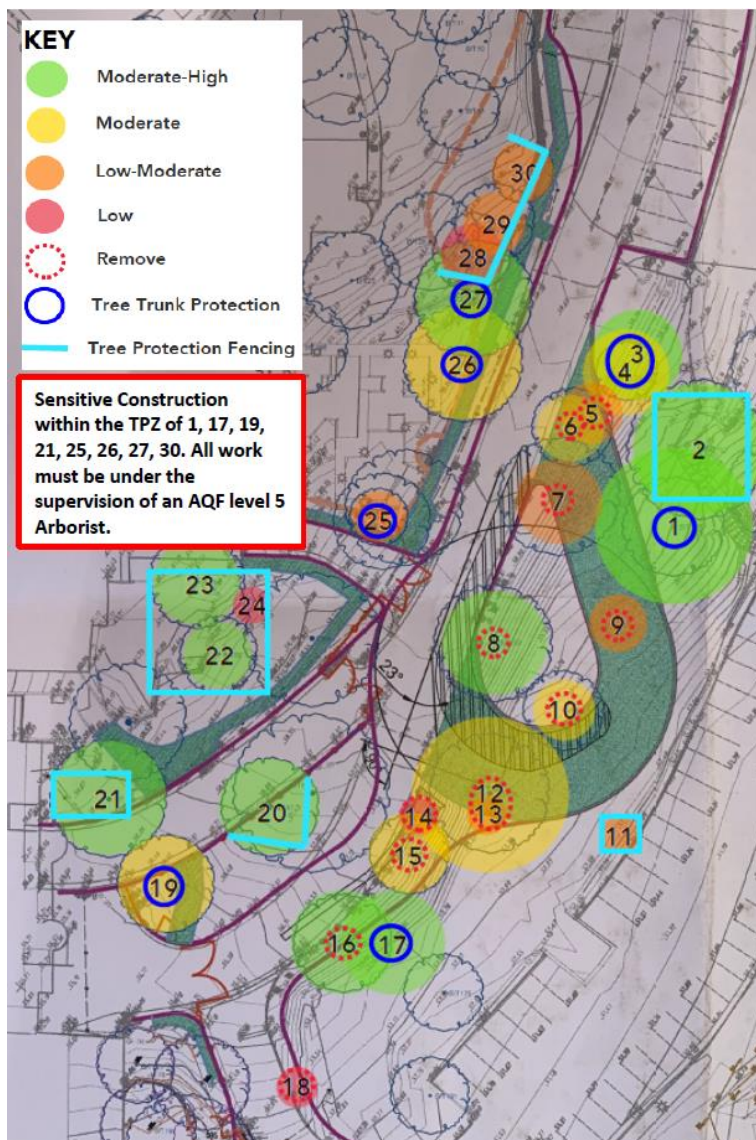


Figure 9 Tree protection zone and management plan.

Source: McArdle Aboricultural Consultancy

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.

Urbis Heritage Response:

The Loop Road is no longer required to pass through the Link Between Stages 1 and 5 given the revised design for a driveway extension. However, this opening is still required for the access of bushfire and emergency vehicles. For the reasons outlined by Heritage NSW above and by Urbis previously this is considered an acceptable intervention given the relative significance of the impacted fabric.

4. Landscaping works

Please see Council submission on landscaping for further comments.

Urbis Heritage Response:

Refer discussion on landscaping at Section 3.2 above.

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).

Urbis Heritage Response:

Refer above.

- **Building alterations**

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

Urbis Heritage Response:

Noted.

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.

Urbis Heritage Response:

Noted.

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.

Urbis Heritage Response:

Noted. However, please note that the demolition of the slab to Level 4 in the courtyard has been omitted from the design.

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”

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.

Urbis Heritage Response:

The supports of the COLA roof have been designed with a certain mass which ensures that it does not look too insubstantial in front of the robust brutalist building. The triangular walls are detached from the existing building and do not permanently obscure any fabric (all fabric can be seen from some angle).

For legibility, the geometry of the walls is in keeping with the language of the other new interventions. The “origami” geometry of folded planes is contrasting with the architecture of mass of the existing fabric.

Please see the revised colour palette proposed for the COLA below. This palette demonstrates more natural tones than those original proposed but remain varied as per council’s advice.



Figure 10 Proposed colour palette for COLA.

Source: Lacoste Stevenson

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.

Urbis Heritage Response:

Noted.

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 given the use of colour in the interior.

Urbis Heritage Response:

Noted.

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.

Urbis Heritage Response:

Noted.

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 off form and 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.

Urbis Heritage Response:

The design of the proposed opening through the concrete wall adjacent to the spiral stairs near Level 4 entrance to Stage 2 has been altered. The extent of the opening has been reduced by 50%. The area immediately adjacent to the staircase would be retained in its entirety and the opening to achieve light penetration through the building would be confined to the area to the north.

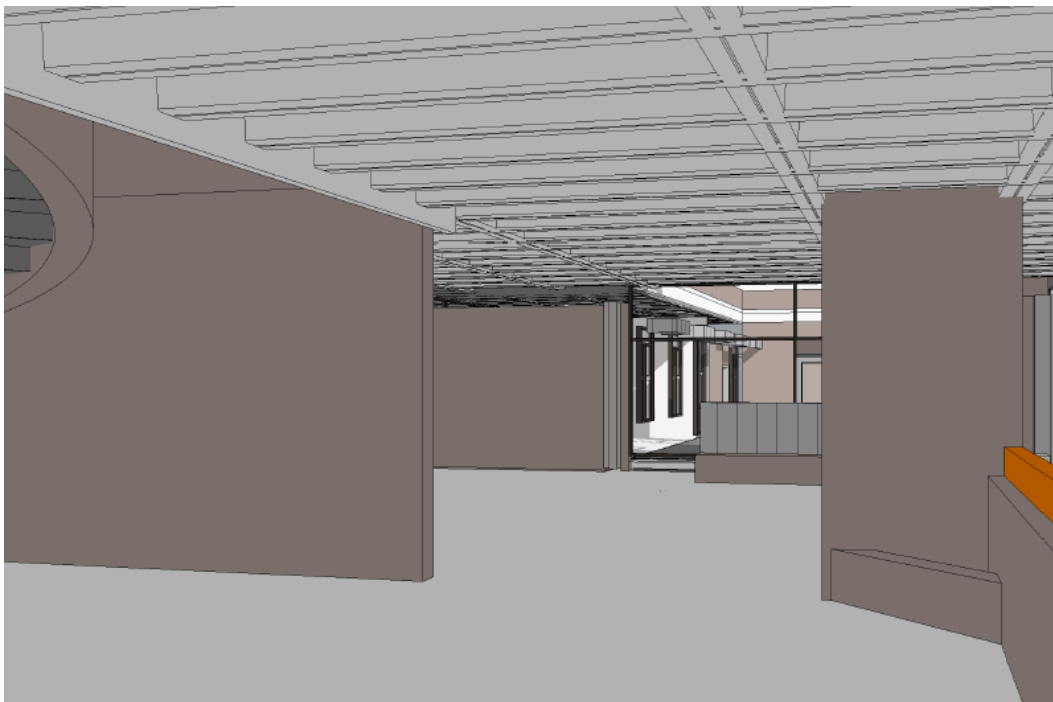


Figure 11 View towards new opening from Level 4 entry showing 50% reduced size of opening.

Source: DesignInc

3.5. DUNSTAN GROVE STRATA

The Heritage Impact Statement makes reference to specific conservation policies or strategies that do not appear to be on the public record. Notwithstanding this, we note that the HIS is clear that the proposed demolition of heritage building fabric to facilitate the Loop Road is of some impact. The HIS attempts to justify these impacts by positing that this is necessary to achieve suitable traffic arrangements, however, this is not borne out by the complete absence of any analysis of potential alternatives to the current configuration.

Urbis Heritage Response:

The Conservation Management Plan prepared by Urbis is available on the Department of Planning's Planning Portal.

The options for the implementation of the Link Road have been rigorously tested over several months. It has been determined that the most utilitarian option from the perspective of all disciplines involved is Option 4 (below). Please note that the options analysis completed by Urbis from a heritage perspective acknowledged a heritage impact as a result of all options. The selection of Option 4 was driven by consideration of a number of disciplines.



Figure 12 Proposed bus turnaround area.

Source: ARUP

4. RESPONSE TO PUBLIC SUBMISSIONS

Demolition of parts of the building to accommodate loop road has no consideration of heritage value of building.

The previous submission demonstrated the impact of the demolition of part of the building on its significant. In summary, it was considered to be appropriate for the following reasons:

- The ground floor of the link between Stages 1 and 5 of the building is graded only as being of moderate significance, meaning this element can accept a degree of change without impacting the overall significance of the item.
- 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 however as a service/courtyard area it is assessed as of lesser significance.
- The principal forms of either Stage 4 or 5 will not be impacted (only the link between them will be impacted).
- The concrete balustrade to the south of the link and to the west of the proposed link road will not be impacted.
- Level 2 slab which is visible as exposed concrete will not be impacted.

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