



PEOPLE
CENTRED
HERITAGE

13 September 2023

Attention: Luke Jacobs
JohnStaff
Level 5, 9 Castlereagh Street
Sydney NSW 2000

Dear Mr Jacobs,

Concord High School – DA2023-0135 Heritage referral response

Extent Heritage Pty Ltd (Extent Heritage) has been commissioned by School Infrastructure NSW (SINSW) to provide a Statement of Heritage Impact (SOHI) for the redevelopment of Concord High School. The purpose of the report is to analyse the potential heritage impacts of the project on the known heritage significance of Concord High School, which is listed on Schedule 5 of the *Canada Bay Local Environmental Plan 2013* (Canada Bay LEP 2013) as Concord High School Grounds – landscape Item no. I421.

The redevelopment intends to cater to increased student capacity and improved amenity at the school. The works consist of the demolition of existing structures, the construction of a new combined facility, the refurbishment of the existing library, landscaping, perimeter fencing, and supporting transport infrastructure. The Development Application (DA) for the works was submitted to City of Canada Bay Council on 20 June 2023 as DA2023-0135.

SINSW received comments with regard to the heritage aspects of the proposal on 2 August 2023. The comments referenced the following aspects of the proposal:

- Removal of trees as part of south-western carpark extension
- Relocation of Modular Block 1 (uniform shop)
- Potential removal of Tree 191
- Potential removal of Trees 7 and 8

This letter intends to clarify the heritage impacts of the above elements of the proposal, and to address concerns around their impacts on the significance of the heritage item.

South-western carpark tree removal

It is proposed to upgrade and extend the south-western staff carpark to offset the loss of existing carparking spaces within the development footprint of new buildings Block X, Block Y and Block Z. The proposed works to the existing staff car park are to achieve a total of 29 spaces.

As part of these works, 11 trees adjacent to the existing carpark are required to be removed (below). The heritage referral response raised concerns that the removal of these trees would adversely affect the landscape qualities of the site and therefore its heritage values.

Note: demolition and landscape plans depict Tree 95 as intended for removal; however, this tree has already been removed (between 19 March 2023 and 1 May 2023).

In developing the proposal multiple options for the extension of the carpark were considered. One design option considered a dog-leg west from the existing carpark. This option was dismissed due to concerns around impacts to Tree 192. The current proposal has been designed to avoid trees considered to be of higher heritage significance, that is trees that are considered more likely to date from significant periods of landscaping at the site – 1940s-1960s or c1978. Options for the construction of new carparking areas on the site were not considered as this would likely require a greater level of construction works and associated vegetation removal and earthworks.

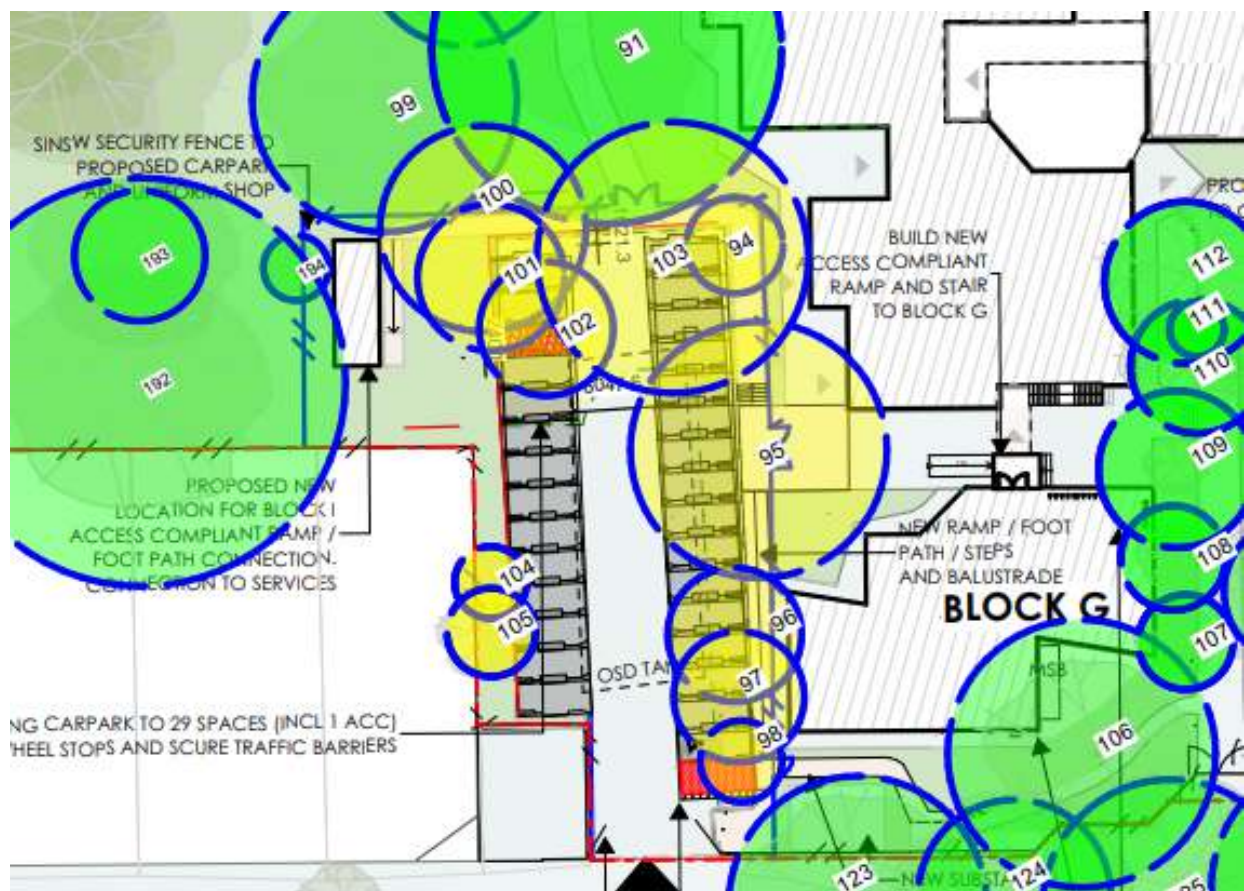


Figure 1. Detail Tree Location Plan, 20 June 2023, Birds Tree Consultancy. Trees proposed for removal shown in yellow.

Table 1. Excerpt, Arboricultural Development Impact Assessment Report, Birds Tree Consultancy, 14 June 2023.

No.	Species	Maturity	Life expectancy	Env. and landscape sig.
94	Toona ciliate	Mature	40 +	Medium
95	Cinnamomum camphora	-Demolished between March and May 2023		
96	Eucalyptus tereticornis	Mature	15-40	High
97	Eucalyptus punctata	Mature	15-40	High
98	Syncarpia glomulifera	Mature	15-40	High
100	Cinnamomum camphora	Mature	15-40	Medium
101	Podocarpus elatus	Mature	15-40	Medium
102	Cinnamomum camphora	Mature	15-40	Medium
103	Cinnamomum camphora	Mature	15-40	Medium
104	Fraxinus griffithii	Mature	15-40	Medium
105	Cinnamomum camphora	Mature	15-40	Medium

Heritage significance of trees to be removed

The heritage significance of Concord High School is associated with remnant landscaping dating from the use of the site by Farleigh Nettheim from c.1940s – 1960s, and with the landscaping works undertaken c.1978 as part of the development of the High School. The Statement of Significance reads:

School grounds conserving former garden trees from c.1930/40 period. Indigenous trees up to c.80 years old and a consciously designed entry landscape from c.1970 enhancing the building group and the general environs and streetscape.

A review of the Arboricultural Development Impact Assessment Report and historic aerial imagery and landscaping plans prepared in c.1977 was used to attempt to determine the age and significance of each of the trees proposed for removal.

The existing carpark was installed between 2005 and 2009, and Trees 96, 97, 98, 104 and 105 appear from aerial imagery to date from this period.



Figure 2. Aerial 2005.



Figure 3. Aerial 2009.

No new plantings that correspond with the species and location of the existing trees are shown on the Landscaping Site Plan and Schedule of Plants prepared by the Government Architect in 1977. As such, Trees 96, 97, 98, 104 and 105 are not considered to be associated with this period. The 1977 Landscaping Site Plan identifies trees located in the location of Trees 100, 101, 102 and 103. It does not appear to indicate a tree in the location of Tree 94. Tree 94 is therefore also assumed to date to after 1978.

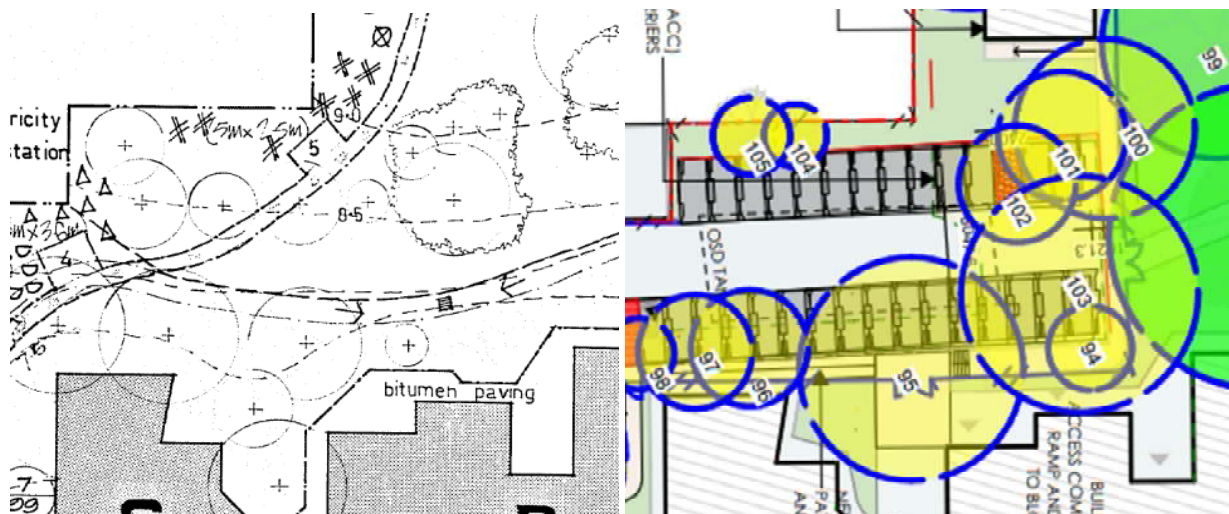


Figure 4. Excerpts, Landscaping and Site Plan, 1977 and Tree Location Plan, 2023.

Trees 100, 101, 102 and 103 are located in the area of landscaping dating from the Farleigh Nettheim use of the site. The definite identification of trees associated with these works is difficult. The Arboricultural Assessment provides maturity and life expectancy, but does not provide more specific aging of trees. It is assumed that the larger and more mature trees are more likely to be associated with the period of Farleigh Nettheim occupation. The State Heritage Inventory sheet for the site, prepared in 1999, identified remnant former garden trees including 'camphor laurel (c.15m, c.1930/40)'. However, on the basis of the analysis we have outlined above, it is considered more likely that the larger camphor laurels in this area (e.g. Tree 192) date from the Farleigh Nettheim use.



Figure 5. Historic aerials from 1943 (left) and 1961 (right). Approximate location of Trees 100, 101, 102 and 103 circled in red.

Given their location, species and relative sizes and ages, Trees 100, 101, 102 and 103 are not considered to date from the c.1930/1940 use of the site by Farleigh Nettheim. They are considered more likely to be later plantings, or self-seeded plantings.

Table 2. Potential significance of individual trees.

No.	Species	Provenance	Significance
94	Toona ciliate	Post-1978	Little
96	Eucalyptus tereticornis	Carpark construction c.2005-2009	Little
97	Eucalyptus punctata	Carpark construction c.2005-2009	Little
98	Syncarpia glomulifera	Carpark construction c.2005-2009	Little
100	Cinnamomum camphora	Unknown – potentially c.1940 to c.1970	Moderate
101	Podocarpus elatus	Unknown – likely post-1977	Little
102	Cinnamomum camphora	Unknown – potentially c.1940 to c.1970	Moderate
103	Cinnamomum camphora	Unknown – potentially c.1940 to c.1970	Moderate
104	Fraxinus griffithii	Carpark construction c.2005-2009	Little
105	Cinnamomum camphora	Carpark construction c.2005-2009	Little

Heritage impact

The extension of the carpark is necessary to accommodate the functional, everyday use of the site by staff and students. The extension of an existing carparking is preferable to the construction of new carparking within the site, which would likely require greater removal of vegetation and impacts to the landscape quality and amenity of the site.

While each tree contributes to the overall landscape quality and heritage significance of the site, the removal of individual trees is not considered to necessarily detract from its overall significance.

None of the trees to be removed are known to be directly associated with significant landscaping at the site; however, the *Cinnamomum camphora* (Trees 100, 102 and 103) may be associated with the Farleigh Nettheim landscaping, either as remnant plantings, later like-for-like plantings, or self-seeded plantings. The proposal retains those trees considered to be of higher significance, that are more likely to be associated with significant periods of landscaping. The proposal also retains the majority of the trees in this area of the site, as well as throughout the school grounds, maintaining its landscaped character and amenity.

The removal of these individual trees is not considered to adversely impact the landscape qualities of the site, nor its heritage significance.

Relocation of Block I (Uniform Shop)

Modular Block I (uniform shop) will be relocated to the west of the staff car park. The heritage referral response raised concerns that the relocation would be a visually intrusive element, and potentially adversely impact the trees.

Heritage impact

The proposed location is behind the existing substation on Stanley Street, which has limited visibility from the public domain. The proposed location is less visible from the public domain than the existing location, and as such this is not considered to have an adverse heritage impact. Block I is a modular, demountable building, and is also not likely to have an adverse impact on the trees in the vicinity.

Tree 191

Tree 191 is a high retention endemic tree species, *Eucalyptus tereticornis*. It has a 'major encroachment' of 30%, however due to the retention value of the tree it is recommended that root mapping is undertaken before the tree is determined non-viable with the design.

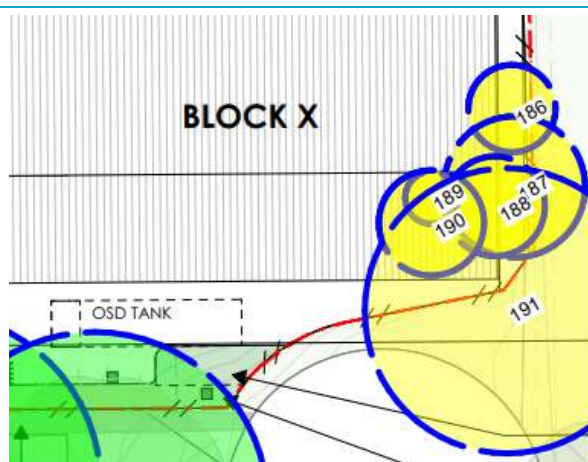


Figure 6. Detail, Tree Location Plan, 20 June 2023, Birds Tree Consultancy.



Figure 7. View to Tree 191.

Heritage significance of Tree 191

The location and species of Tree 191 corresponds with a planting depicted on the 1977 Landscaping Site Plan and Schedule of Plants. It is considered likely that Tree 191 was planted as part of this significant period of landscaping, and therefore is of high significance.

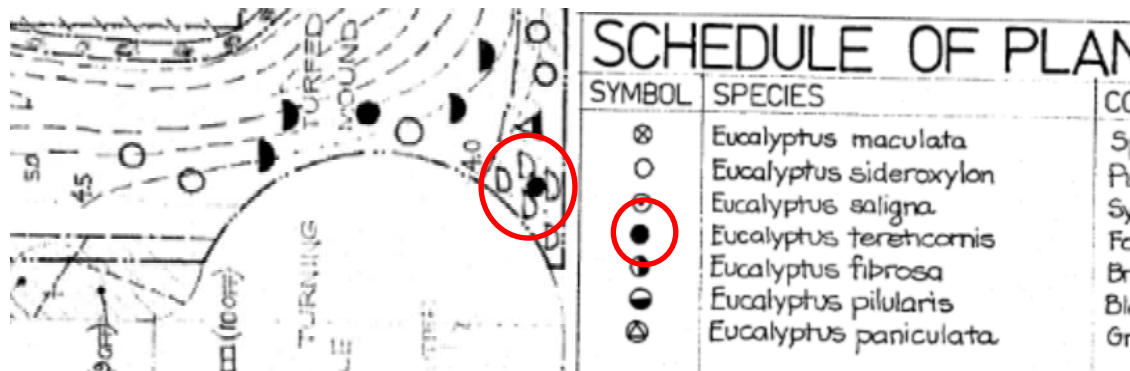


Figure 8. Detail, SB2577/96, Concord High School Landscaping Site Plan, 1977.

Heritage impact of potential removal

Tree 191 is considered to be of high heritage significance as a result of its association with the 1978 landscaping works. In addition, it makes a strong contribution to the landscape character of the site and streetscape. Its retention is strongly encouraged.

Trees 7-8

It appears that Trees 7-8 are considered not viable with the design due to the location of the OSD Tank. Shifting the location of this OSD could retain these (2) trees. The subterranean stormwater pipe will be running through the TPZ of trees 7-19. Directional drilling the pipe through this location will mitigate the development impacts.

Heritage significance of Trees 7 and 8

Tree 7 (*Casuarina* spp.) and Tree 8 (*Eucalyptus microcorys*) are not identified on the 1977 Landscaping Site Plan and Schedule of Plants. They are not considered to be of individual significance.

Heritage impact of potential removal

Trees 7 and 8 are located in a highly vegetated area of the site and are not considered to be of individual heritage significance. While their retention is encouraged, their removal is not considered to adversely impact the landscape quality or heritage significance of the site.

Conclusion

This letter has looked at specific elements of the proposed redevelopment of Concord High School in regards to impacts to individual trees at the site, and the potential impacts to the landscape quality and heritage significance of the heritage item.



The works overall intend to cater to increased student capacity and improved amenity at the school, and have been designed to avoid adverse impacts to vegetation and significant fabric at the site. Both as individual elements and cumulatively, the above works are not considered to adversely impact the heritage significance of the item.

Kind regards,

Hayley Edmonds

Heritage Advisor | Extent Heritage