



Heritage Council

of New South Wales

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Our Ref:
File: 10/12588

Mr Peter Goth – Director
Sydney West Region
Department of Planning
Locked Bag 5020
Parramatta NSW 2124

Dear Mr Goth,

Planning Proposal Old Kings School Site, Parramatta

Thank you for referring the above Planning Proposal to the Heritage Council on 5 December 2011 for comment.

The documents submitted with your referral including the Crown Lands Reserve Trust Planning Proposal Report "Old Kings School transfer of Floor Space Ratio and Revision of Building Height Restrictions" prepared by GHD dated November 2011 and Heritage Impact Statement "Subdivision of NW Corner Proposed Right of Way Former Marsden Hospital" prepared by Government Architect's Office of Department of Public Works dated November 2011 have been reviewed.

The following comments are provided for consideration of the LEP Panel;

The Planning Proposal applies to land known as the Old Kings School Site and or Former Marsden Rehabilitation Centre. The site comprises three separate lots Lot 1 DP 1112822 and Lots 3 and 4 DP 1132683.

Lot 1 DP 1112822 includes the 1836 Old Kings School Main Building and Headmasters Residence.

Lots 3 and 4 DP 1132683 includes other school buildings such as 1910 School Complex and 1934 Dormitory Building, the Oval, open space and river foreshore.

The site in its entirety is listed on the State Heritage Register as the Kings School Group (Item No. 00771) and Marsden Rehabilitation Centre Group (Item No. 00826). The Marsden Rehabilitation Centre and potential archaeological site is listed in Schedule 5 Environmental heritage of Parramatta City Centre Local Environmental Plan 2007.

The Old Kings School site is currently owned by the State and reserved under the Crown Lands Act 1989.

The Planning Proposal seeks to amend the maximum height and floor space ratio controls for the Old Kings School Site in the Parramatta City Centre Local Environmental Plan 2007

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to facilitate subdivision of an "L" shaped portion of the north west of the site ("L" shaped site). The "L" shaped site, approximately 5,874 m² in area, will be purchased and developed for education and community purposes by the Catholic Diocese of Parramatta. The Diocese owns adjoining land to the Old Kings School Site.

Subdivision of the "L" shaped site requires approval of the Heritage Council under the Heritage Act 1977 due to the "L" shaped site being located within the boundary of the State Heritage Register listing for the Kings School Group. The Heritage Branch is currently in receipt of an application for subdivision of the site.

The Planning Proposal also includes creation of a Right of Way from Marist Place across of rear of the Old Kings School Main School Building to provide delivery vehicle access to the rear of the "L" shaped site.

The majority of the Old Kings School site is currently zoned B4 Mixed Use under Parramatta City Centre Local Environmental Plan 2007. A small strip of river foreshore land is zoned RE1 Public Recreation under Parramatta City Centre Local Environmental Plan 2007.

The Old Kings School Site is covered by two building height controls under the Parramatta City Centre Local Environmental Plan 2007. A maximum building height of 18 metres applies to the north west of the site (Area P illustrated in the PLEP 2007 Height of Buildings Map) and a maximum building height of 10 metres applies to the central part of the site (Area K illustrated in PLEP 2007 Height of Buildings Map).

The Planning Proposal proposes revision of the Height of Buildings Boundary on the Parramatta Local Environmental Plan 2007 Height of Buildings Map to ensure a consistent maximum height limit of 18 metres across the "L" shaped site with the remaining Government retained portion of the site subject to a 10 metre height control.

The Old Kings School site in its entirety is covered by a maximum floor space ratio limit of 0.6 :1 under the Parramatta City Centre LEP 2007.

The Planning Proposal proposes amendment of the maximum floor space ratio for the site to transfer of 5,375 m² of surplus gross floor area from the Government retained portion of the Old Kings School site to the "L" shaped site. The transfer will enable the Catholic Diocese to achieve a net gross floor area of 8,900 m² required for proposed development. The Planning Proposal proposes maximum floor space ratio limit of 1.52 :1 for the "L" shaped site and 0.4:1 for the Government retained portion of the site.

The Heritage Council does not support a consistent maximum 18 metre height limit over the whole of the "L" shaped site. The Heritage Council believes that the "tail" of Area P illustrated in the Height of Buildings Map of the Parramatta City Centre LEP 2007 Map should be amended to a maximum height limit of 10 metres in order to provide an appropriate transition between new development on the "L" shaped site and the buildings of heritage significance on the central part of the Old Kings School Site (Main School Building, School Complex and Dormitory Building). Areas currently illustrated in the Map as having a maximum height limit of 10 metres should remain at this limit. The Heritage Council further believes that a maximum 10 metre height limit is necessary in the tail of the "L" to protect the heritage significance and setting of these buildings.

The Heritage Council supports the proposed increase in floor space ratio limit from 0.6 :1 to 1.52:1 on the "L" shaped site on the basis that the Conservation Management Plan, prepared by Godden Mackay Logan in 1994 and updated in 2005, foreshadows potential for new development on the "L" shaped site. The Conservation Management Plan was endorsed by the Heritage Council in 2005.

The Heritage Council believes that new development that occurs on the "L" shaped site should, however, be guided by the policies within the Conservation Management Plan to protect the heritage significance and setting of the Old Kings School Site.

The Heritage Council considers the following excerpts of Policy 3.2.1 and 3.2.2 for the L shaped area at the north west corner of the site of the 2005 Conservation Management Plan to be relevant for new development ;

- *building placement and height does not adversely impact on the significant views of the site from The Crescent and Parramatta Park*
- *development along the Victoria Road frontage is sited to create courtyard and garden spaces which reflect the built form and land scapes area relationships of the existing development in the vicinity , in particular, Our Lady of Mercy College and the existing spaces around large buildings within the site eg to the south of the Dormitory Building*
- *building widths should relate to those of the north south wing of the Dormitory Building*
- *building lengths should not be greater than the length of the north south wing of the Dormitory Building*
- *the minimum separation between new buildings should be approximately equal to the height of the two buildings to eaves level or, where one building is higher than the other, the height to the eaves of the higher of the two buildings*

The Heritage Council believes that the policies of the Conservation Management Plan, particularly where they relate to new development on the "L" shaped site, should be transcribed into a Development Control Plan that is prepared for the Old Kings School Site to ensure that new development does not adversely impact the overall heritage significance of the Old Kings School Site and in particular the heritage significance and setting of the Main School Building, School Complex and Dormitory Building. The development control plan should be placed on exhibition together with the local environmental plan in order to provide opportunity for public comment.

The Heritage Council does not support the proposed Right-of-Way from Marist Place to the rear of the "L" shaped site and associated turning bay because this will adversely impact the heritage significance and setting of the Headmasters Cottage, Main School Building and School Complex.

The proposed Right-of-Way will also affect potential future "community" use of these buildings as their presentation and setting will be changed by the provision of the Right of Way and turning area. It will impose restrictions on future adaptability of car parking arrangements for the Main School Building and School Complex.

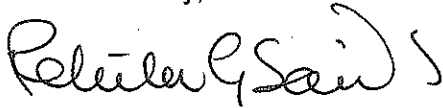
The Heritage Council considers the proposed Right-of-Way to be unnecessary as delivery vehicle access points to the "L" shaped site is currently available on both Lot 1 DP 1034092 and Lot 3 DP 1132683. These existing delivery vehicle access points should be used for access to the "L" shaped site.

The Heritage Council further considers that any turning bay required by development on the "L" shaped site should be wholly provided within the L" shaped site to avoid alienation of

Government retained lands. Sufficient area for provision of a turning bay exists on the "L" shaped site.

For further information please contact Alice Brandjes on (02) 9873 8560.

Yours sincerely,



Petula Samios

Director

Heritage Branch

Office of Environment & Heritage

13.12.11

AS DELEGATE OF THE NSW HERITAGE COUNCIL



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