

SUBMISSION SUMMARY TABLE – Draft Heritage Strategy –EXHIBITION DATES

MATTERS RAISED IN THE SUBMISSION	COMMENT	RECOMMENDATION
1.0 INTRODUCTION DEFINING HERITAGE		
<p><i>Defining heritage</i></p> <ul style="list-style-type: none"> Heritage should not just be built form, support for defining heritage as also settings, landscapes, views, parks and walking tracks It is important for areas and buildings to be defined and protected from development imposed by the State government via the LEP and DCP The phrase ‘our Heritage list’ needs to be specifically defined The definition of heritage is not referenced The definition of heritage as ‘places identified on our heritage list’ is too narrow. Council’s heritage list is not a closed one, as there are potential heritage items and areas, which do not, or do not yet fall within this definition but have heritage value and are yet to be researched and properly documented. The ‘Ku-ring-gai Municipal Council Heritage Study 1988’ states that <i>‘the inventory cannot ever be considered complete or immutable’</i>. 	<ul style="list-style-type: none"> Comments regarding the definitions of ‘heritage’ are noted. Schedule 5 of the Ku-ring-gai Local Environmental Plan is a statutory register that provides legal protection for heritage items and heritage conservation areas. Some items have protection on the State Heritage Register under the NSW Heritage Act 1977. The basis for the definition used to establish heritage – is sourced on the definition, meaning and assessment of heritage under the Burra Charter . Comments regarding the phrase ‘our Heritage list’ iare noted Council continues to review and consider existing and new heritage items on an individual basis and as part of wider studies. Part 19 of the Ku-ring-gai DCP and considers other heritage elements eg a building, structure, object, landscape or location, 	<ul style="list-style-type: none"> No change to definition of the ‘heritage’ Amend the Strategy to define ‘our Heritage list’ as Schedule 5 in the KLEP2015
2.0 HISTORY OF KU-RING-GAI		
<ul style="list-style-type: none"> The History of Ku-ring-gai section does not do justice to the depth of Ku-ring-gai’s history Inclusion of reference maps on page 5 would be helpful to orient the reader ‘AHO’ needs to be written out in full before using the acronym 	<ul style="list-style-type: none"> The introductory History section of the Strategy intends to provide a simple context for the Strategy. The Historical Society and the Local Studies Research through Library services provides access to a large collection of material related to Ku-ring-gai’s built heritage and local history, with staff and volunteers available to assist exploring and interpretation of the material. The Ku-ring-gai Local Environmental Plan includes Map sheets for Heritage, these are available online at the NSW Legislation website The Strategy has been amended with AHO has been written out in full first. 	<ul style="list-style-type: none"> Amend Strategy to write ‘Aboriginal Heritage Office’ out in full first.
4.0 HERITAGE RESOURCES		
<p>4.1 Heritage Studies</p> <p><i>Priority: Develop and expand Aboriginal heritage resources</i></p> <p><i>Priority: Develop and expand archaeological resources</i></p> <ul style="list-style-type: none"> A suggestion for reference to European Archaeology as well such as Echo Point Farm, Smiths Boatshed, St Ives Showground, Hyndes and Fiddens Wharf, WW1 	<ul style="list-style-type: none"> An archaeological study would consider all forms of archaeology, and would not exclude European archaeology. An exhaustive amount of heritage studies have been conducted. These studies can be acquired through an application for access to information under the <i>Government Information (Public Access) Act 2009</i> (the GIPA Act). 	<ul style="list-style-type: none"> Amend the Strategy to remove Appendix 1 ‘Heritage studies undertaken in Ku-ring-gai’.

SUBMISSION SUMMARY TABLE – Draft Heritage Strategy –EXHIBITION DATES

<p>trenches as Roseville Chase, the Two Creeks Track and the Broadway.</p> <p><i>Priority: Continue to use and draw on previous Heritage studies</i></p> <ul style="list-style-type: none"> • A large list of site specific studies are missing • Significant studies conducted in the past have been omitted from the list, including: <ul style="list-style-type: none"> ◦ Godden Mackay Logan Keys Young, June 2000, Ku-ring-gai Heritage and Neighbourhood Character Study – Residential Development Strategy, Draft Report prepared for Ku-ring-gai Municipal Council ◦ Travis McEwen Group Pty, Ltd, Urban Designers and Town Planners, 23 March 2000, Ku-ring-gai Draft Residential Strategy ◦ Conacher Travers Environmental Consultants, December 1999, Ku-ring-gai Residential Development Strategy Environmental Baseline Study. Ku-ring-gai Municipal Council (re; 9095) • The Heritage and Neighbourhood Character Study (Godden Mackay Logan Pty Ltd) in 2000 is arguably the principal heritage study in Ku-ring-gai and should be referenced in Section 2 and Section 5.1 of the Strategy. • The 2000 Heritage and Neighbourhood Character Study should be used as a defining document, this study has already been paid for and this heritage hasn't changed. A 'Broad Local Character Areas' layer over Ku-ring-gai is superfluous 	<p>Council is currently developing a Local Character Study to identify areas of special landscape character relating to views, visual quality, urban forest (including bushland, tree canopy, street trees, gardens) and topography. The Local Character Study will identify the important visual and landscape character elements of the LGA that need to be protected and enhanced.</p> <p>A visual character study prepared by M A Schell and Associates in 1999 has been used to inform Council's planning policies to date. However, it is now over 20 years old. Its assessment was largely based on housing styles and the study only partially covered the Ku-ring-gai LGA. While aspects of that study may still be relevant, a lot has changed in the Ku-ring-gai LGA, particularly in terms of the built environment. Similarly, in the intervening 20 years since this study was prepared, GIS mapping capabilities (i.e. detailed aerial photography, improved mapping of trees and vegetation and the built form) have advanced significantly. Coupled with 'ground-truthing', this detailed suite of information allows us to overlay and compare multiple factors more easily, giving a much richer indication of local character across the LGA.</p> <p>The local character work has a much broader remit than aspects of heritage. The draft Local Character Study has been prepared in accordance with the Department of Planning, Industry and Environment's Local Character and Place Guidelines These character statements will assist the understanding and implementation of Council's adopted Local Strategic Planning Statement - including the series of strategies and studies being prepared for example the Green Grid, Urban forest strategy and Heritage strategy.</p> <p>The heritage values of Ku-ring-gai are protected in the KLEP through individual heritage listings in Schedule 5 and heritage conservation area overlays. The intent of any future local character overlays is not to replace existing heritage overlay, but rather complement them by providing additional protection areas outside of established HCAs.</p>	
<p>4.2 Listing of heritage items and HCAs</p> <p><i>Priority: Review existing and identify new heritage items and HCAs</i></p> <ul style="list-style-type: none"> • Concerns that the areas identified by the National Trust in 1997 that were not gazetted at the time, have still not been granted protection despite heritage consultant recommendations for significant areas of what was original proposed to be protected. It is believed that these areas have been denied heritage protection to allow for future high density and medium density proposals to occur e.g. Heart of Lindfield Estate, Newark Crescent and Middle Harbour Road HCA. 	<ul style="list-style-type: none"> • Noted Individual heritage listings and revisions to the heritage conservation areas are not part of the overall Heritage Strategy • Council is aware of the need to continually review the existing heritage conservation areas as well as those groups of buildings that may warrant protection as part of a potential conservation area. Council will always consider enquiries in relation to specific areas, which are noted by individuals and the community to be of potential significance and encourages contact to be made with the Strategic Planning section in this regard. 	<ul style="list-style-type: none"> • No amendment to the Strategy is recommended.

SUBMISSION SUMMARY TABLE – Draft Heritage Strategy –EXHIBITION DATES

<ul style="list-style-type: none"> Need for increased protection for the 'Urban Conservation Areas' along the North Shore Railway Line from Roseville to Wahroonga identified in 1997 by the National Trust. 		
<p>4.3 Focus on conserving significant mid-late c 20th development</p> <p><i>Priority: Conservation of significant 20th century development</i></p> <ul style="list-style-type: none"> Support for the conservation of significant mid-late 20th century development, Ku-ring-gai has been the beneficiary of many respected 20th century architects from Pettit & Sevitt to Glen Murcutt homes. Contemporary architecture needs to be recognised. Need for an Action to deliver Priority 4.3 'Conservation of significant mid-late 20th Century development' 	<ul style="list-style-type: none"> Support for the conservation of significant mid-late 20th Century development and the need for recognition of contemporary architecture is noted. Council has applied for State Government funding to assist in the preparation of a comprehensive Modern Heritage Study. If this funding is not attained, a smaller scale Modern Heritage Study will be prepared in 2021. 	<ul style="list-style-type: none"> Amend the Strategy to include an Action to pursue funding from the State Government to assist in the preparation of a comprehensive Modern Heritage Study and to prepare a smaller scale Modern Heritage Study if State Government funding is not realized.
<p>4.4 Heritage policies – DCP</p> <p><i>Priority: Review and refine existing DCP19 Controls with DA team</i></p> <ul style="list-style-type: none"> Need to include protections for non-listed contributory items and character streetscapes not currently within an HCA Need for tighter controls on development and construction approvals in relation to heritage 	<ul style="list-style-type: none"> It is not the purpose of the Heritage Strategy to identify specific amendments to planning controls relating to heritage. Processes under the EP&A Act govern any amendments to Ku-ring-gai's LEP or Development Control Plan (DCP). Rather, the purpose of the Heritage Strategy is to ensure that reviews of Council's Heritage controls are regularly undertaken. This is covered by Action 2.1 of the Heritage Strategy. 	<ul style="list-style-type: none"> No amendment to the Strategy is recommended
<p>4.5 Focus on the interface between development and heritage assets</p> <p><i>Priority: Focus on areas interfacing with heritage items and HCAs</i></p> <ul style="list-style-type: none"> Need to improve DCP controls to ensure stricter interface and landscape controls to ensure heritage items, areas and curtilages are not impacted If issues of interfaces and development intruding into HCAs are not addressed, Councils ability to protect and preserve the heritage integrity of HCAs will be weakened. Recommendation of a minimum 250m radius 'protection zone' around any heritage item or HCA in which medium or high density is not permissible. The Strategy recognises the importance of 'buffering' around HCAs, this needs to explicitly prohibit up-zoning or any multi-dwelling development of properties in the vicinity of a HCA. 	<ul style="list-style-type: none"> Part 19 'Heritage Items and Heritage Conservation Areas' of the Development Control Plan (DCP) is being reviewed and refined, as outlined in Action 2.1 of the Heritage Strategy. Part 19 of the DCP includes controls specific to development in the vicinity of heritage items and heritage conservation areas, with regard to local character and streetscape, building setbacks, gardens and landscaping, and fencing. Whilst the controls within Part 19 of the DCP are rigorous, certain sites and sites within the vicinity of heritage items and HCA's are subject to State Environmental Planning Policies which may not consider heritage, such as the State Environmental Planning Policy (Infrastructure) 2007, the State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 and the State Environmental Planning Policy (Exempt and Complying Development Codes) 2008. Additionally, development applications refused by Council's Development Assessment team may overturned by the Land and Environment Court. 	<ul style="list-style-type: none"> No amendment to the Strategy is recommended
<p>4.6 Heritage Reference Committee</p> <ul style="list-style-type: none"> Suggestion for the Heritage Reference Committee to include an additional member who is well versed in landscape heritage, curtilage and trees to balance out the focus on built form 	<ul style="list-style-type: none"> The Heritage Reference Committee retains proficient knowledge of all realms of heritage expertise, including landscape heritage. Specialist advice is sought when deemed necessary. 	<ul style="list-style-type: none"> No amendment to the Strategy is recommended.

SUBMISSION SUMMARY TABLE – Draft Heritage Strategy –EXHIBITION DATES

4.7 Ku-ring-gai Historical Society <ul style="list-style-type: none"> Support any increase in financial support for the historical society. 	<ul style="list-style-type: none"> Support is noted. 	<ul style="list-style-type: none"> No amendment to the Strategy is recommended.
4.9 Heritage Home Grants <ul style="list-style-type: none"> The heritage home grant program should be issued quarterly, a year is too long to wait when heritage homes need immediate repairs 	<ul style="list-style-type: none"> Whilst it would be desirable, the provision of a quarterly heritage home grant program is not feasible with regard to funding and resourcing. The annual program ensures more meaningful and substantial grants can be provided to assist with suitable projects. The current heritage home grants program corresponds with the annual National Trust Heritage Festival. 	<ul style="list-style-type: none"> No amendment to the Strategy is recommended.
4.9 Architecture, Landscape and Urban Design Awards – Heritage Design <ul style="list-style-type: none"> Suggestions for a Landscape design associated with Heritage gardens category within the Architecture, Landscape and Design awards 	<ul style="list-style-type: none"> This suggestion will be taken into consideration for the next Architecture, Landscape and Urban Design Awards. 	<ul style="list-style-type: none"> No amendment to the Strategy is recommended.
5.0 HERITAGE CHALLENGES AND OPPORTUNITIES		
5.1 Heritage identification and documentation <ul style="list-style-type: none"> Suggestion for the use of volunteers to update heritage database and inventory sheets 	<ul style="list-style-type: none"> The Ku-ring-gai Historical Society suitably utilises volunteers. The heritage database and inventory sheets need to be produced by a qualified staff member to ensure they would prove acceptable or admissible by a judge in a court. 	<ul style="list-style-type: none"> No amendment to the Strategy is recommended.
5.2 Heritage education and promotion <ul style="list-style-type: none"> Increasing public awareness of Ku-ring-gai's heritage assets and local character could be achieved through inclusion in Council newsletters, displays in local libraries, local events and promotion of the Ku-ring-gai historical society activities. Recommendation for a Ku-ring-gai Heritage Festival, collaborating with local community groups and the Ku-ring-gai Historical Society. Real estate agents need to be included within efforts to educate the community, as they are at the front line of buying and selling properties. Concerns regarding the delay of the reopening of Tulkiyan <p><i>Website and App</i></p> <ul style="list-style-type: none"> Need for Councils website to provide a more clear distinction between Heritage Items and HCAs. Need for clarification on the website regarding heritage maintenance and repairs, with a list of actions that are permissible without a minor works assessment. This will help achieve a balance between guiding new development and respecting heritage assets. Councils website should be used as a platform to promote heritage in Ku-ring-gai including Councils heritage assets i.e. Tulkiyan. Support for an interactive history and heritage website, and a heritage app 	<ul style="list-style-type: none"> Suggestions to increase public awareness of Ku-ring-gai heritage assets and local character are noted. Council is currently in the process of improving the website. Council's heritage staff is currently working with the communications team to ensure Ku-ring-gai is a part of the National Trust Heritage Festival in 2021. Council's heritage officers often provide advice to real estate agents, including providing Inventory Sheets for specific properties. Tulkiyan needs to be properly accessible and align with current Australian standards in this regard. This process is currently being undertaken by Council. Council is also seeking State Government funding to assist with the reopening process. Council's website has recently been updated, and the 'Heritage Item' and 'Heritage Conservation Area' information pages have been separated across two different webpages. Council offers a free Duty Planner service to assist residents to understand Council's planning controls and provide preliminary advice on planning-related enquiries associated with properties and development proposals. Advice on mitigating heritage impacts can be sought through the pre-development application process. The Strategy acknowledges that this covers all areas under consideration for the development application, not just heritage conservation. In response to this, Action 3.1 of the Heritage Strategy is to investigate the provision of a heritage advisory 	<ul style="list-style-type: none"> No amendment to the Strategy is recommended.

SUBMISSION SUMMARY TABLE – Draft Heritage Strategy –EXHIBITION DATES

<p><i>Heritage walks</i></p> <ul style="list-style-type: none"> Strong support for heritage education and promotion, suggestion for Council to work with FOKE when developing heritage walks as they have conducted these in the past. 	<p>service in the short term.</p> <ul style="list-style-type: none"> Council's website includes a page dedicated to development controls and approvals specifically for heritage properties, and outlines the pre-DA consultation services and the minor heritage works application process. Council is in the process of promoting State listed items on the Council website, as well as through the National Trust Heritage Festival Support for an interactive heritage website and a Heritage App is noted. Support for heritage education and promotion is noted. Heritage walks will form part of the National Trust Heritage Festival, Council is open to liaising with community groups for this purpose. 	
6.0 STRATEGY ACTION PLAN		
<ul style="list-style-type: none"> Action 1.1 needs to include an action to conduct an additional heritage study across the various eras, with more categories such as settings and landscapes Support for Action 1.2, 1.3 and 1.4 Under Action 1.4, the Archaeological study could include European heritage sites as well, such as the rubbish midden at Echo Point and the 1917 army trenches at Roseville Chase Support for Action 2.1 Under Action 2.3 there needs to be references to how the regular maintenance of Council's heritage assets will be funded into the future Under Action 2.3, existing CMPs should be utilised, such as for the KWG Pavilion Need for an Action to deliver Priority 4.2 'To identify new heritage items and HCAs' Need for an Action to deliver Priority 4.3 'Conservation of significant mid-late 20th Century development' Need for an Action to deliver Priority 4.5 'Focus on areas interfacing with Heritage Items and HCAs'. 	<ul style="list-style-type: none"> Settings and landscapes are integral to the existing heritage conservation areas and heritage items in Ku-ring-gai. The consideration of landscape and setting form a large part of the ongoing monitoring and consideration of heritage items and conservation areas. Council has applied for State Government funding to assist in the preparation of a comprehensive Modern Heritage Study. If this funding is not attained, a smaller scale Modern Heritage Study will be prepared in 2021. Support for Action 1.2, 1.3, 1.4 and 2.1 is noted An archaeological study would consider all forms of archaeology, and would not exclude European archaeology. European heritage sites are noted. Council's integrated planning and reporting framework ensures transparency regarding funding of Council's heritage assets. The Delivery Program and Operational Plan includes an indicative capital works program. The Resourcing Strategy 2020 – 2030 includes a 10-year Long Term Financial Plan and a 10-year Asset Management Strategy. Conservation Management Plans ('CMPs') begin to become redundant within 10 years of being prepared and require regular updating in accordance with current or changed conditions. Where appropriate, existing CMP's will be referenced and utilised. Council has applied for State Government funding to assist in the preparation of a comprehensive Modern Heritage Study. If this funding is not attained, a smaller scale Modern Heritage Study will be prepared in 2021. 	<ul style="list-style-type: none"> No amendment to the Strategy is recommended.
SUPPORT FOR AND CONCERNS FOR HERITAGE PROTECTION		
<p><i>Support for heritage protection</i></p> <ul style="list-style-type: none"> General support for the objectives and priorities outlined in the Draft Heritage 	<ul style="list-style-type: none"> Support for the objectives and priorities in the Strategy is noted Support for Ku-ring-gai's heritage conservation efforts is noted Support for a longer term Heritage Strategy (25+ years) is noted. 	<ul style="list-style-type: none"> No amendment to the Strategy is recommended

SUBMISSION SUMMARY TABLE – Draft Heritage Strategy –EXHIBITION DATES

<p>Strategy</p> <ul style="list-style-type: none"> Support for the heritage conservation efforts by Ku-ring-gai Council Support for a longer term policy (25+ years) to preserve heritage <p><i>Concerns for heritage protection</i></p> <ul style="list-style-type: none"> Heritage items and HCAs are most at risk within 800m of rail stations due to State Government strategies to target these areas for additional medium and high-density development. These early subdivision areas of Ku-ring-gai are where most of the intact contributory and heritage items are located. The protection of heritage and increasing density near transport are two competing objectives that are not compatible. Need to include protections for Ku-ring-gai's unique heritage natural environment and its habitat, the canopy, remnant Blue Gum High Forest that are entwined with archaeological and Aboriginal heritage A likely obstacle to heritage protection and appropriate development is clarity, time and cost of the process. Council should provide a heritage advisory service for owners of heritage properties and provide a clear information on the website in respect to what works require what approvals. Council should remove minor works and DA fees for heritage items, it is noted this has been done for minor works applications required to carry out development associated with heritage grants. Publishing minor works and DA assessment times for heritage items would foster confidence in the efficiency of the system and contribute to education. 	<ul style="list-style-type: none"> The Heritage Strategy will be reviewed over time with changing of planning legislation and priorities of the Council. Schedule 5 of the Ku-ring-gai Local Environmental Plan is a statutory register that provides legal protection for heritage items and heritage conservation areas. Some items have protection on the State Heritage Register under the NSW Heritage Act 1977. Heritage items and heritage conservation areas are always considered when future strategic planning is undertaken. The existing Riparian, Biodiversity and Greenweb protection zones provide relatively extensive protection of species of vegetation. It is anticipated that a future Aboriginal heritage and archaeological studies will identify areas or significance in this regard. Action 3.1 of the Heritage Strategy is to investigate the provision of a heritage advisory service in the short term. Council offers a free Duty Planner service to assist residents to understand Council's planning controls and provide preliminary advice on planning-related enquiries associated with properties and development proposals. Council's website includes a page dedicated to development controls and approvals specifically for heritage properties, and outlines the pre-DA consultation services and the minor heritage works application process. Monetary considerations such as fees and charges are not within the scope of the Heritage Strategy. The purpose of the Heritage Strategy is to provide direction for heritage management and link heritage to wider strategic planning. Details regarding development assessment submission and determination dates are available via the DA tracker on Council's website. 	
SITE SPECIFIC ISSUES		
<p>Middle Harbour Road HCA</p> <ul style="list-style-type: none"> Concerns regarding the exclusion of the southern section of Middle Harbour Road, Lindfield between Capper Street and Trafalgar Avenue from the Middle Harbour Heritage Conservation Area. This area contains some of Lindfield's oldest federation homes and warrants a review in the context of the heritage study. 	<ul style="list-style-type: none"> Noted Individual heritage listings and revisions to the heritage conservation areas are not part of the overall Heritage Strategy 	<ul style="list-style-type: none"> No amendment to the Strategy is recommended
<p>Ku-ring-gai Wildflower Garden Pavilion</p> <ul style="list-style-type: none"> Need to include the Ku-ring-gai Wildflower Garden Pavilion as a local heritage item 	<ul style="list-style-type: none"> Noted Individual heritage listings and revisions to the heritage conservation areas are not part of the overall Heritage Strategy 	<ul style="list-style-type: none"> No amendment to the Strategy is recommended

SUBMISSION SUMMARY TABLE – Draft Heritage Strategy –EXHIBITION DATES

<p>11, 15, 17, 19 and 21 Beaconsfield Parade, Lindfield</p> <ul style="list-style-type: none"> • Submission from the property owners of 11, 15 and 21 Beaconsfield Parade, Lindfield • The inclusion of these properties within the Lindfield West Heritage Conservation Area was imposed on the properties without any notification or opportunity for comment. • Request for the properties at 11, 15, 17, 19 and 21 Beaconsfield Parade, Lindfield be removed from the heritage conservation area. • The street has drastically changed in recent years, with multi-dwelling developments occurring in the street. • Contradictory information on Council's website regarding the inclusion of 15A Beaconsfield Parade within the HCA. 	<p>Noted Individual heritage listings and revisions to the heritage conservation areas are not part of the overall Heritage Strategy</p> <ul style="list-style-type: none"> • Landholders have the option to seek the amend the boundary of the Heritage Conservation Area through the submission of a private planning proposal. 	<ul style="list-style-type: none"> • No amendment to the Strategy is recommended
<p>11, 15, 17, 19 and 21 Beaconsfield Parade, Lindfield</p> <ul style="list-style-type: none"> • Submission from the property owners of 17 and 19 Beaconsfield Parade, Lindfield • Not in favour of the removal of number 11, 15, 17, 19 and 21 Beaconsfield Parade from the Frances Street / West Lindfield Heritage Conservation Area • Support for maintaining the current Heritage Conservation Area 	<ul style="list-style-type: none"> • Objection to the de-listing of 11-21 Beaconsfield Parade, Lindfield is noted. Landholders have the option to seek to amend the boundary of the Heritage Conservation Area through the submission of a private planning proposal. The removal of properties from Heritage Conservation Areas is not a consideration of the Heritage Strategy. 	<ul style="list-style-type: none"> • No amendment to the Strategy is recommended
<p>71 Douglas Street, St Ives</p> <ul style="list-style-type: none"> • A heritage study of mid-century heritage should include 71 Douglas Street, St Ives. • The property was designed and built by internationally regarded architect Dino Burratini as his own home, and is a wonderful example of mid century design. 	<ul style="list-style-type: none"> • Noted Individual heritage listings and revisions to the heritage conservation areas are not part of the overall Heritage Strategy • Council has applied for State Government funding to assist in the preparation of a comprehensive Modern Heritage Study. If this funding is not attained, a smaller scale Modern Heritage Study will be prepared in 2021. 	<ul style="list-style-type: none"> • No amendment to the Strategy is recommended