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SCEGGS DARLINGHURST - RESPONSE TO SUBMISSIONS - HERITAGE COMMENTS

The Department of Planning and Environment (DPE) issued a letter on 8 April 2022 requesting a response to submissions during the public exhibition of the State Significant Development Application (SSDA) 8993 for the adaptive reuse of Wilkinson House at SCEGGS Darlinghurst. This letter has been prepared to provide responses to the heritage issues raised.

Department of Planning and Environment

DPE provided a list of Key Issues as part of their Response to Submissions request. The following was noted in relation to the heritage aspects of the proposal.

The Department notes that the adaptive re-use of Wilkinson House would involve the demolition of all internal floors and associated elements within the building (excluding for the main entrance foyer and lounge hall) and would therefore result in significant loss of internal fabric.

The Department supports the City of Sydney Council's recommendation for the salvage, re-use and recycling of traditional building materials and elements. It is requested that the Response to Submissions Report (RtS) identifies opportunities for any of the existing materials or elements within the building to be salvaged during demolition and either incorporated as part of the adaptive re-use of the building (where possible) or alternatively utilised at other locations across the school campus.

The salvage, re-use and recycling of materials must be considered in consultation with the project's heritage consultant.

As identified in the Heritage Impact Statement prepared by Urbis (dated 17 January 2022), a potential number of elements are proposed to be either salvaged and re-used and/or salvaged and recycled due to the extent of the proposed internal demolition to the building. The staircase balustrades are proposed to be salvaged and reinterpreted as part of a new art piece. Further elements to be salvaged and reused could include cornices, skirtings, architraves, picture rails, doors and windows, where possible. However, it is noted that the majority of these elements are ranked as being of Moderate and/or Little significance to Wilkinson House and are common features throughout Inter War residential flat buildings. Final details of the elements to be salvaged and reused will be determined during the detailed design and construction phases and will be further outlined in the Schedule of

Conservation Works, Salvage Methodology and Heritage Interpretation Strategy which will need to be prepared as part of the response to Conditions of Consent.

As a general principle, any items that cannot be reused within the building would first be identified to be utilised at other locations across the school campus, and if not, use can be found within the campus, would be transferred to a second-hand materials dealer.

City of Sydney

The City of Sydney Council provided their advice on the EIS on 4 April 2022, which included commentary on the heritage aspects of the project and recommended conditions of consent which address the key issues raised by Council. The table below provides comments on each of the conditions that relate to heritage, as well as recommended rewording (where required) or deletion. Generally, where the approval authority had been noted to be Council, Urbis have recommended for the Planning Secretary instead. Recommended changes to proposed conditions are indicated in red.

Council Recommended Condition, including	Urbis Comment
Condition 2: Retention of Internal Features <i>The entrance lobby and hall are to be retained in their entirety including wall, floor and ceiling finishes, fireplaces, timber joinery and carpentry, glazing, doors, windows, architraves, cornices, picture rails, skirtings, fixtures and fittings and moveable items. If during the construction works elements are required to be disassembled, they must be reconstructed to match existing.</i>	Additional wording is recommended in the event that some reconstruction may be necessary during the construction works.
Condition 3: Floor Levels <i>The proposed floor levels must match existing levels so that the relationship with the existing window and balcony openings is maintained. Details reflecting this must be submitted for approval prior to demolition.</i>	Recommend that this condition is deleted as new floor levels are proposed which do not affect the intersection with window and balcony openings. The new floors levels will also ensure that there is equitable access to and from Wilkinson House and adjacent building. Refer also to Smart Design studio response.
Condition 4: Eave Lining to Roof <i>The proposed eave lining to the new roof must match the existing in terms of detailing and design. Archival records should be undertaken to document the eave lining in detail to assist in the exact representation. The details must be submitted for approval prior to demolition.</i>	Recommended that this condition is deleted and instead included as part of Condition 8 and 11 to avoid duplication. The eave lining for the new roof is proposed to match the existing (and will be specified as part of the Schedule of Conservation Works) and an archival record of this element can

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	be undertaken as part of Condition 11.
Condition 7: Salvage, Reuse and Recycling of Traditional Building Materials <i>Any stone, bricks, joinery, timber balustrade, timber floorboards, and decorative architectural elements to be demolished, which include stairs, windows and doors, architraves, skirtings, picture rails, cornices, fireplaces, chimney pieces and ceiling roses should must be salvaged and reused on the project, where possible.</i> <i>Salvaged building materials surplus to the project should must either be stored on site for future reuse or transferred to an established second building material dealer for recycling. Existing concrete must be reused or appropriately recycled, where possible.</i> <i>Documentation of the salvage, reuse and recycle methodology must be submitted for approval prior to the commencement of demolition, excavation or construction work.</i>	Recommended to allow for greater flexibility in the wording of this condition as it will not be possible to reuse all elements listed within the adaptive reuse of Wilkinson House. The minor edits to this condition reflect this approach.
Condition 8: Heritage Conservation Works <i>(a) Prior to the issue of any Construction Certificate, a conservation work schedule detailing methodologies for implementation of the recommendations of the CMP Part 2 for SCEGGS Darlinghurst Wilkinson House prepared by Urbis dated 17 January 2022 and the Heritage Impact Statement for SCEGGS Darlinghurst Wilkinson House prepared by Urbis dated 17 January 2022 must be submitted to and approved by Council the Planning Secretary.</i> <i>(b) The schedule is to detail the conservation of all fabric identified as having a heritage significance including but not limited to the following stonework, brickwork, door and window joinery, glazing, hardware, pavements, signage, eaves lining and tiling.</i> <i>(c) The schedule is to be supported by outline specifications, methodologies and detailed architectural sections, elevations and plans at 1:20 and 1:5 scales. The details should</i>	Minor suggested amendments for final sign-off to be undertaken by Planning Secretary and inclusion of details on eaves lining, as per Condition 4.

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<i>incorporate any structural and/or building services design for the building.</i> <i>(d) The proposed works are to be carried out in a manner that minimises demolition, alterations and new penetrations/fixings to the significant fabric of the existing building.</i> <i>(e) All conservation and adaptation works are to be in accordance with the Articles of the Australian ICOMOS Burra Charter 2013. Appropriately qualified contractors and tradespersons are to be commissioned who are skilled in traditional building and engineering trades to carry out the proposed scope of works within the heritage building.</i> <i>(f) INSPECTION AND APPROVAL: The conservation works are to be progressively inspected and implemented to the satisfaction of Council's Area Planning Manager Planning Secretary prior to the issue of any Occupation Certificate or commencement of the use, whichever is the earlier.</i>	
Condition 9: Heritage Interpretation Plan <i>(a) A Heritage Interpretation Plan for Wilkinson House must be submitted to and approved by Council's Area Planning Manager the Planning Secretary prior to any Construction Certificate being issued. The plan is to be prepared by a suitably qualified and experienced heritage practitioner or historian.</i> <i>(b) The original internal terrazzo staircase and timber balustrade must be interpreted in collaboration with an artist as part of the proposal. The details must be included in the interpretation plan and submitted for approval.</i> <i>(c) The interpretation plan must include details on the reuse of skirtings, architraves, picture rails, doors, windows and timber floorboards within the proposal, where proposed.</i> <i>(d) Further interpretation of the original planning and room layout must be included on each floor using floor or/and ceiling inlays.</i> <i>(e) The interpretation plan must detail how information on the history and significance of the Wilkinson House will be</i>	Minor suggested amendments for approval to be undertaken by Planning Secretary instead of Council. Recommended that (b) is altered to allow flexibility in the approach of the interpretation of the original terrazzo staircase and timber balustrade. Recommended that (c) should be amended to allow greater flexibility for the interpretation of retained and salvaged elements. Recommended that (d) has a minor amendment. The extent of interpretation proposed to convey the original planning and room layout will be determined during the detailed design phase. Urbis do not consider it necessary to state that

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<i>provided for the public and make recommendations regarding public accessibility, signage and lighting. Public art, details of the heritage design, the display of selected artefacts are some of the means that can be used. Future management and maintenance policies must be included as well as time frames for implementation.</i> <i>(f) The plan must include detailed design and specify the location, size, type, making materials and contents of the interpretation device being proposed.</i> <i>(g) Prior to occupation certificate being issued the approved interpretation plan must be implemented to the satisfaction of Council's Area Planning Manager the Planning Secretary.</i>	further interpretation of the original planning and room layout, beyond the extent outlined in the HIS is necessary, given the intent if for ceiling and/or floor inlays to be present in some capacity across each of the floors.
Condition 10: Materials for Making Good <i>New materials for making good and repairs, are to match the existing in terms of colours, finishes, sizes, profile and properties.</i>	No comment, retain as stated.
Condition 11: Photographic Archival Documentation <i>Prior to any Construction Certificate being issued, an archival photographic recording of the Wilkinson House is to be prepared to Council's satisfaction. The recording is to be in digital form, prepared in accordance with the NSW Heritage Division of the Department of Environment and Heritage guidelines titled "Photographic Recording of Heritage Items using Film or Digital Capture". One copy of the record is to be submitted to the Planning Secretary and one copy of the record is to be submitted to Council to be lodged with Council's Archives.</i> <i>Procedure</i> <i>For buildings or structures with heritage significance, the archival documentation, and the number and type of selected enlarged photographs required will be determined by the significance and quality of the building or structure. For a scope of work, refer to Council's Heritage Specialist to determine the particular architectural/design features of the building/site that may need to be recorded.</i>	Recommended to remove the portion of the condition that specifies Council's Heritage Specialist should determine the extent of the documentation and minor suggested amendments for approval by Planning Secretary instead of Council. Minor suggested amendment to change 'conservation architect' to 'heritage consultant' for consistency in conditions.

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For buildings or structures with no heritage significance the archival documentation requirements are less comprehensive and may just be limited to contextual and exterior photographs only. However, this will depend upon the type, complexity and significance of the building, and should be confirmed with Council's Area Planning Manager. Because significant fabric may remain concealed and only be exposed during construction works, the archival recording is to be undertaken in stages, prior to the removal of any significant building fabric or furnishings from the site, during the removal of fabric on site that exposes significant building fabric or furnishings, and after work has been completed on site, as considered appropriate by the conservation architect <i>heritage consultant</i> commissioned for the project, and submitted as two parts as follows. (a) The first submission of the archival recording of significant building fabric or furnishings is to be prior to the removal of any significant building fabric or furnishings from the site, and must be submitted to and approved by the Planning Secretary Council prior to the commencement of any work on site and prior to a Construction Certificate being issued. (b) The second submission of the archival recording is of significant building fabric or furnishings that is exposed during demolition or construction and after work has been completed on site and must be submitted to the Planning Secretary Council prior to any Occupation Certificate being issued. The form of recording is to be a photographic documentation of the site and its context, and the exteriors and interiors of the existing building(s) photographed, where appropriate, using a camera/lens capable of 'perspective correction'. (c) For each of the two submissions listed above in (a) and (b), the digital form of the recording is to be as follows: (i) The Application number and the Condition of Consent number must be noted.	

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(ii) Include a summary report detailing the project description, date and authorship of the photographic record, method of documentation and limitations of the photographic record. (iii) The electronic images are to be taken with a minimum 8 megapixel camera, saved as JPEG TIFF or PDF files with a size of approximately 4-6MB, and cross referenced to the digital catalogue sheets and base plans. Choose only images that are necessary to document the process and avoid duplicate images. (iv) Include written confirmation, issued with the authority of both the applicant and the photographer that the City of Sydney is granted a perpetual non-exclusive licence to make use of the copyright in all images supplied, including the right to make copies available to third parties as though they were Council images. The signatures of both the applicant and the photographer must be included. (v) The report can be submitted on a USB, or digital file transfer in PDF/A format (created directly from the digital original), with a digital catalogue of images with the following data for each location, image subject/description and date.	
Condition 12: Use of Heritage Consultant (a) An experienced heritage consultant is to be commissioned to work with the consultant team throughout the design development, contract documentation and construction stages of the project. The heritage consultant conservation architect is to be involved in the resolution of all matters where existing significant fabric and spaces are to be subject to preservation, restoration, reconstruction, adaptive reuse, recording and demolition. The heritage consultant is to be provided with full access to the site and authorised by the applicant to respond directly to the Planning Secretary Council where information or clarification is required regarding the resolution of heritage issues throughout the project.	Minor suggested amendment to change 'conservation architect' to 'heritage consultant' for consistency in conditions and change from Council to Planning Secretary.
Condition 13: Cyclical Maintenance Plan A cyclical maintenance plan specifying frequency and methodologies to conduct building inspections and	A Cyclical Maintenance Plan already formed part of the Part 2 CMP for Wilkinson House. However, an updated version of



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<i>maintenance works to building elements and services must be submitted to and approved by Council's Area Planning Manager the Planning Secretary prior to the issue of any Occupation Certificate. The maintenance plan is to be prepared by a suitably qualified heritage consultant and endorsed by the building owner.</i>	this plan can be prepared to address this condition. Minor suggested amendments for approval to be undertaken by Planning Secretary instead of Council.

We trust that this letter provides clarity to DPE surrounding the heritage issues raised as part of the response to submissions for the SSDA 8993 for the adaptive reuse of Wilkinson House.

Yours sincerely,

A handwritten signature in black ink, consisting of a stylized 'K' followed by a horizontal line.

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