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26 October 2021

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To whom it may concern,

RESPONSE TO CITY OF SYDNEY FINAL COMMENTS ON WILKINSON HOUSE CMP

Urbis has been engaged by SCEGGS Darlinghurst to prepare the following letter in response to the comments received from the City of Sydney Council (CoS) following a meeting to discuss the Conservation Management Plan for Wilkinson House (Part 2), dated 22 September 2021, on the 30 September 2021. Written feedback was issued by CoS on 8 October 2021. A copy of these comments is attached at the end of this letter.

This letter has also been prepared to advise the Department of Planning, Industry and Environment (DPIE) on the outcomes of the consultation with CoS to date in relation to the preparation of the Wilkinson House CMP. Feedback from CoS in relation to the SCEGGS Darlinghurst campus CMP (Part 1) had been received previously. No further comments have been received from CoS in relation to the Part 1 CMP for the SCEGGS Darlinghurst campus.

RESPONSE TO FINAL COMMENTS, 8 OCTOBER 2021

Following the meeting with CoS on 30 September and the comments received dated 8 October 2021, CoS acknowledges that there are some areas of disagreement in the opinions of some gradings of significance and therefore associated policies.

Minor modifications have been made to the Part 2 Wilkinson House CMP following these comments from CoS. Other amendments have been made to the Part 2 CMP following DPIE comments on the Part 1 CMP. These changes are largely in relation to the adaptive reuse options for Wilkinson House contain in Sections 7.6 and 7.7 to ensure continuity between to the Part 1 and 2 CMPs.

Many of the comments received from CoS are similar to those received in response to the draft CMP for Wilkinson House dated 22 July 2021. General responses to the comments received from CoS are provided below and are grouped according to general themes of the comments.

Grading of fabric

One ascertain that was raised in the meeting was the implication that the works undertaken to Wilkinson House in its conversion from boarding house to the existing classroom and staff use in 2001

was not in accordance with the 2001 CMP. The works undertaken by SCEGGS Darlinghurst in 2001 were in accordance with the previous CMP and no works have been undertaken to the building that were not in accordance with the policies of that CMP. The interiors of the original flats were graded as being of Moderate significance in the 2001 CMP and allowance was made within the policies for alterations to be undertaken that would allow for the building conversion from boarding house to classroom and staff uses. This involved more intervention on Levels 2 and less on Levels 1 and ground floor. The grading of the interiors of the former flats is not just graded as being of Little significance due to these changes, it is also the acknowledgement that the association and use by SCEGGS Darlinghurst over the past 60 years is an intrinsic part of the significance of the place. The original flats layout and their remaining original fabric are not elements that intrinsically contribute to overall significance of Wilkinson House.

We acknowledge that the approach taken in the grading of significance for the fabric of Wilkinson House is not an orthodox approach where all original fabric is considered to be sacrosanct and must be maintained and conserved in any proposed adaptive reuse of the place. Such an approach would not ensure that the building is viable for use into the future. The approach instead is one that balances the significance of fabric (as designed by Emil Sodersten) against the significance of the building to SCEGGS in terms of its use and associations. The outcome that the CMP for Wilkinson House is striving for is one that balances the tangible and intangible aspects of the building and provides guidelines and policies in order to ensure those elements of the buildings fabric that are most significant are appropriately conserved and those that are of less significance are either conserved or appropriately interpreted and recorded to allow for the adaptive reuse of the place.

It has also been further clarified in the comparative analysis (Section 5.1) that the interiors of the former flats within Wilkinson House are not unique either in the portfolio of Sodersten's work, nor are the details within (ie. timber and plaster detailing) rare or outstanding elements for the Inter War period. Wilkinson House is also the only example of Sodersten's remaining flat buildings that is no longer use as a flat building, a reality that has been the case since 1960.

Elements of the interiors that are recognised being of higher architectural merit and more intact, such as the entrance foyer and lounge hall, and to a lesser degree such as the staircase and balconies are identified as being of High and Moderate significance. The grading of Moderate significance for the balconies and staircase are still considered to be appropriate given that they contribute to the overall significance of Wilkinson House, however are not considered to be key elements of the place's significance.

Policies for fabric

As previously addressed, the CMP provides policies for the approach to fabric of differing significance. Generally, elements of High significance should be retained and conserved, while fabric of lesser significance allow for greater degrees of change. Refer to Policy 11 which outlines the approach to elements of differing significance.

Policies that make specific reference to elements of Moderate significance (see for example Policy 51, 67 and 69) generally encourage these elements be retained in the first instance. However, also allow for a degree of change (whether it be for change of use, for compliance, educational needs etc.) that must be supported by appropriate interpretation, recording and/or salvage of elements in specific policies. Policies are also provided for the interpretation and /or salvage of elements of Little significance such as the original flat layouts and interior decorative elements in Policy 68 and 69.



CONCLUSION

We hope that the above clarifications to CoS comment provide sufficient response to the comments raised in relation to the Part 2 CMP.

We welcome any further discussion on the Part 2 CMP following the lodgement with the Stage 1 for the adaptive reuse of Wilkinson House.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Keira Kucharska".

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Reviewed and endorsed by

A handwritten signature in black ink, appearing to read "Stephen Davies".

Stephen Davies
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ATTACHMENT A

City of Sydney, 165-215 Forbes Street, Darlinghurst – SCEGGS, Wilkinson House revised CMP by Urbis dated 22 September 2021 (8 October 2021)



22 September 2021

Brent Devine
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To whom it may concern,

RESPONSE TO CITY OF SYDNEY COMMENTS ON SCEGGS CONSERVATION MANAGEMENT PLANS – WILKINSON HOUSE CMP

PURPOSE

Urbis has been engaged by SCEGGS Darlinghurst to prepare the following letter in response to comments received from the City of Sydney Council (CoS) following a meeting to discuss the draft Conservation Management Plans (CMPs) for SCEGGS Darlinghurst Campus held on 17 August 2021. This letter has also been prepared to advise the Department of Planning, Industry and Environment (DPIE) on the outcomes of the consultation with CoS to date in relation to the preparation of the SCEGGS Darlinghurst: Wilkinson House CMP Part 2. Comments received directly in relation to the SCEGGS Darlinghurst: Campus CMP Part 1 have been previously addressed in a separate letter dated 8 September 2021 and have been attached at the end of this letter.

As per the Conditions of Consent of the SSDA 8993 Condition B4A requires the preparation of a CMP for Wilkinson House to be submitted prior to or with the future detailed development application for Wilkinson House. A draft version of the Part 2 CMP was issued to Council on 22 July 2021 for review and comment. A meeting to discuss Council's review was held on 17 August 2021.

Urbis prepared the following notes of the meeting as they relate to comments regarding the Part 2 CMP and issued to the participants of the meeting including CoS via email on 18 August 2021:

Both CMPs are to be updated accordingly and re-issued to CoS, prior to formally lodging the Whole Site CMP to DPIE for endorsement.

Wilkinson House CMP:

- Review works undertaken to Wilkinson House post 2002, following conversion from boarding house to existing classrooms and staff facilities and add any additional information*
- Grading of internal layouts to be reviewed as current grading of Little significance was not considered to be appropriate. Differentiations in grading of different levels (ground, Level 1 and Level 2) should be considered given the differing integrity of fabric of the levels.*
- Significance of existing roof tiles to be clarified.*



- *As the criteria of rarity was addressed as part of the CMP, which had not been assessed as part of the previous CMP, and the criteria of rarity was determined to be met, consideration of changing the overall significance of Wilkinson House from High to Exceptional to be considered.*
- *All policies to be reviewed to ensure consistency with Whole Site CMP policies*
- *Policies should be revised and amended having further detail on policies as they relate to fabric. GMLs 2001 CMP to be reviewed to guide this approach.*
- *Policies relating to fabric of moderate significance to be revised, as current policies share similar approaches to fabric of Little, Neutral and Intrusive significance*
- *Policies relating to fabric of High significance to be revised, as concern raised that unacceptable change is provided for by wording of policies*

Following the issue of these meeting notes, CoS issued a document entitled *Heritage comments on CMPs prepared by Urbis dated 22 July 2021 for SCEGGS Darlington* (dated 18 August 2021).

This letter has been prepared to respond to the written comments issued by CoS, particularly surrounding the specific comments raised on the Part 2 CMP. Responses to general comments relating to both CMPs and specific comments relating to the Part 1 CMP have been addressed separately in letters dated 8 September 2021 and have been attached at the end of this letter for reference. References to the Part 2 CMP refer to the updated version of the document, dated 22 September 2021.

As outlined in the letter of response to the general comments relating to both CMPs, the preparation of the CMPs came about as a requirement of the conditions of consent for SSDA 8992. Urbis was engaged in late 2020 to provide heritage consultancy services to SCEGGS Darlington for the preparation of the CMPs for the SCEGGS main campus and for Wilkinson House, which was prior to the commencement of the Stage 1 detailed SSDA. The detailed design development begun with the design competition that spanned from November 2020 to February 2021 which was awarded to Smart Design Studio. The draft CMPs as issued to CoS for comment were the result of the formal development of the analysis and investigations that had been undertaken of both the SCEGGS Darlington campus and Wilkinson House since late 2020 and further drew on previous analysis and investigations by others such as TKD. The resultant assessment of significance, gradings of significance and conservation policies development for Wilkinson House were based on this analysis and investigation. The knowledge that Wilkinson House was to be adaptively reused as part of the 2040 Masterplan for SCEGGS Darlington necessitated that our analysis of the significance of Wilkinson House needed to be critical and thorough to be able to appropriately articulate what is the significance of Wilkinson House and in turn, what are appropriate policies in order to maintain and conserve this significance, while allowing for appropriate future change. The determined significance of Wilkinson House, as articulated in the 2021 CMP, while in some respects different from the 2001 CMP, are a natural result of the reassessment of the significance of the place and are a reflection of the changing nature of its understood significance due to alterations and additions undertaken over the past 20 years and the every growing association SCEGGS Darlington.

RESPONSE TO PART 2 CMP COMMENTS AS PREPARED BY URBIS, 18 AUGUST 2021

The following comments provide responses to the notes as prepared by Urbis following the meeting held with Council on 17 August 2021.

Review works undertaken to Wilkinson House post 2002, following conversion from boarding house to existing classrooms and staff facilities and add any additional information

Section 3.2.5 of the CMP has been reviewed, which directly covers the period of 2001 to the present day. No significant works have been undertaken to the building, other than those already mentioned in

relation to the conversion from a boarding house to the existing classrooms and staff facilities in 2001. However, the interiors of the building have undergone progressive changes in the former of recurrent maintenance, fire upgrades and compliance works over the last 20 years. Additional photographs from 2002 have been included to show the refurbishment of the interiors of Wilkinson House post this conversion.

Grading of internal layouts to be reviewed as current grading of Little significance was not considered to be appropriate. Differentiations in grading of different levels (ground, Level 1 and Level 2) should be considered given the differing integrity of fabric of the levels.

While the internal layouts at ground, Level 1 and Level 2 do differ in terms of the amount of intervention that has occurred and the original elements retained, overall the existing internal layouts of the former flats are still considered to be of Little significance across all three levels as they have been degraded by the alterations and additions that have occurred to the building over its history. Elements such as original decorative plaster ceilings, cornices, and timber skirting boards and architraves that remain, primarily at the ground and Level 1 too have been ranked as being of Little significance.

Significance of existing roof tiles to be clarified.

The roof is assumed to have been clad with terracotta roof tiles, likely in a Spanish or Roman profile based on the original drawings by Emil Sodersten which depict a vertically expressed cladding, which differs from the existing Marseille roof tiles. The existing roof tiles are a later fabric and are considered to be of Little significance.

As the criteria of rarity was addressed as part of the CMP, which had not been assessed as part of the previous CMP, and the criteria of rarity was determined to be met, consideration of changing the overall significance of Wilkinson House from High to Exceptional to be considered.

It is acknowledged that the building's design has some rarity values as an example of Sodersten's early works, however, as expressed in the statement of significance, it is not considered to be an outstanding example of his work as Sodersten is better known for his work in the Art Deco style. Wilkinson House is illustrative of an architect at the beginning of their career before they had established a formative style, and as such does not warrant an Exceptional grading. The grading of High significance given to Wilkinson House is reflective of its assessed significance as being an element that has a high degree of original fabric (particularly externally) and that demonstrates a key element of the places' (being the SCEGGS Darlington main campus) significance.

All policies to be reviewed to ensure consistency with Whole Site CMP policies.

All policies within the CMP have been reviewed to ensure consistency with the Whole Site CMP policies. Some minor modifications have been made where needed.

Policies should be revised and amended having further detail on policies as they relate to fabric. GMLs 2001 CMP to be reviewed to guide this approach.

The 2021 CMP for Wilkinson House has been prepared with reference to the previously prepared 2001 CMP for Wilkinson House. However, the policies that have been developed as part of the 2021 CMP directly relate to the reassessed significance of Wilkinson House and have been developed in light of the future adaptive reuse of Wilkinson House. Similarly to the intent of the 2001 CMP, where it was developed to guide the future adaptive reuse of Wilkinson House from a boarding house to an educational use and was reflective of the needs of School at the time. It is appropriate that the policies contained in the current CMP are different to those of the 2001 CMP, as they reflect the understood heritage significance of the place at this point in time and the continuing adaptive reuse of the site.

A discussed previously under different letter head, it is industry best practice that a CMP should be updated every 5-10 years, or in tandem with any proposed major redevelopment of a place. It is not necessary for a new CMP for a site to be consistent with an old CMP.

Policies relating to fabric of moderate significance to be revised, as current policies share similar approaches to fabric of Little, Neutral and Intrusive significance.

Policies that relate to fabric of moderate significance have been reviewed and adjusted. Refer to comments further in this letter which specifically address each of these policies. Some minor amendments to policy wording have been made to address these concerns.

Policies relating to fabric of High significance to be revised, as concern raised that unacceptable change is provided for by wording of policies

Refer to comments further on in this letter which specifically address each of these policies. Generally, the policies are not considered to endorse unacceptable change to any fabric of high significance.

RESPONSE TO PART 2 CMP COMMENTS FROM COS, 18 AUGUST 2021

The following section provides response to the specific comments issued by CoS in relation to the Part 2 CMP. These responses have been divided into discussion of gradings of significance and policies, as the main questions raised by CoS were in relation to these two matters.

Additional comments for Wilkinson House CMP

- 1. All buildings with any assessed rarity, including Wilkinson House, should have exteriors regraded as exceptional significance, because these meet the Heritage Office definition as a "rare or outstanding element directly contributing to an items local/state significance." This includes the roof, elevations and their details.***

Refer to previous answer in relation to the rarity of Wilkinson House.

- 2. The more intact original building interiors should be re-graded as high as a key part of these buildings, which are not just limited to envelope or facades, because these meet the NSW Heritage Office definition as having a "high degree of original fabric" and facadism is not a supported conservation practice to be encouraged by the CMP.***

The grading of the interiors of Wilkinson House at the ground to Level 2 have generally been divided into three gradings of significance, being High, Moderate and Little. The elements of High significance, which have a high degree of original fabric and demonstrate a key element of the place's significance has been limited to the entrance lobby and lounge hall, as these spaces both retain their integrity, are of high quality and retain their original use.

The balconies, staircase and vestibules which were previously graded as being of High significance in the 2001 GML CMP have now been graded as Moderate significance in this report. This regarding of their significance has been a result of the changes to the building since the preparation of the 2001 CMP and the growing association and significance of Wilkinson House with SCEGGS. The changes in use from flat building to boarding house to its current use as classrooms and staff rooms has reduced the significance of this fabric. Given this change, the staircase and balconies have been regraded.

While some internal elements within the former flats remain intact, such as some decorative plaster ceilings, timber skirting boards and architraves, the overall layout and integrity of the original flat spaces have been degraded and are currently difficult to interpret, resulting in the layout of the former flats and their elements being graded as being of Little significance. The 2001 CMP noted these interiors to be of Moderate significance, however, the changes that have occurred to these spaces since the preparation of the 2001 CMP, including maintenance and compliance, has further diluted the

interpretation of the original flats layouts. The grading within the CMP has had regard to the various heritage values both tangible and intangible which have influenced these gradings.

The basement floor has seen the most amount of change and was originally used for utilitarian purposes such as garages and a shop. No internal elements, other than brick walls have remained intact in these areas. The former shop has been converted into a sprinkler and pump room with no fabric relating to a former shop use being present. Thus, the overall grading of these spaces as being given a Neutral grading as they neither add to nor detract from the significance of Wilkinson House.

3. *Surviving original and rare internal fabric has been graded as having little significance. Altered original building interiors should be re-graded at least as moderate significance, because these meet the NSW Heritage Office definition as "contributing to the overall significance of the item". The CMP has not demonstrated that these have been altered to such a degree that the original can no longer be interpreted and therefore satisfy the definition for this grading, but only shows removal of a minority of internal walls.*

Refer to previous response to the grading of internal elements. None of the internal elements of the building which are graded as being of Moderate or Little significance can be considered to be rare. Instead they are representative of the other similar features that are found in other Inter War flat buildings within the local area and make little contribution to the overall significance of the place. See also specific responses in relation to individual grading of fabric further in this letter.

4. *Many gradings of significance in the CMPs need to be upgraded one step.*

Refer to commentary provided in relation to the gradings of significance further in this letter.

5. *There are no policies for retention of original fabric if it is not assessed as exceptional or high significance in the CMPs.*

The nature of grading fabric on a scale necessitates a different approach to their conservation. Generally, elements of Exceptional and High significance should be retained and conserved, while fabric of lesser significance allow for greater degrees of change. Refer to Policy 11 which outlines the approach to elements of differing significance.

Policies that make specific reference to elements of Moderate significance (see for example Policy 51, 67 and 69) generally encourage these elements retention in the first instance. However, also allow for a degree of change (whether it be for change of use, for compliance, educational needs etc.) that must be supported by appropriate interpretation, recording and/or salvage of elements.

6. *Moderate significance fabric is treated the same as Little and Intrusive fabric.*

Policies that relate to fabric of moderate significance have been reviewed and adjusted. Refer to comments further in this letter which specifically address each of these policies. Some minor amendments to policy wording have been made to address these concerns.

7. *The CMPs should remove reference to conservation policies allowing for damage to features of high significance. This is not the purpose of a policy for conservation.*

It is not considered that any of the policies provided within the CMP makes reference to the allowance of damage to features of high significance. Instead, the policies encourage the retention and conservation of all fabric of high significance. Where allowance for change (not damage) to elements of high significance is noted, such as in Policy 17, 32, 40 and 48, these policies do not allow for damage to elements of high significance, instead, they provide parameters for an allowance of change with an approach of minimal intervention (as much as necessary, as little as possible) that still ensures that elements of high significance as respected and enhanced.

8. Conservation policies that apply to high gradings should also include moderate and exceptional.

As no elements of Wilkinson House have been graded as being of exceptional significance, the policies do not include conservation policies for fabric of exceptional significance, as none exists. Conservation policies that apply to elements of high significance should not also include elements of moderate significance. The conservation approach between elements of moderate and high significance should be different to allow a greater degree of possible change to elements of lesser significance, otherwise, there would be no point to the differences in grading.

9. Policy for limiting alterations should apply to fabric of little and detracting significance only and should omit moderate.

Mention of moderate fabric has been removed from Policy 18 and 33. These were the only policy within the CMP that implied the same approach to moderate fabric with that of little, neutral and intrusive fabric.

10. Section 8.6.3: Internal alteration introductory conclusions need to be reviewed significantly or removed because these conclusions are not supported by the Heritage Office grading definitions. Interiors are a key component that contribute to the significance and have not been demonstrated to have been altered beyond interpretation or restoration to have lost this significance. A CMP should not endorse facadism but provide for conservation of the building as a whole, including retention of original internal features, restoration or interpretation where possible.

Further clarification of the introductory conclusions for internal alterations and additions have been added to clarify that any proposed changes to the interior of Wilkinson House must be guided by a robust investigation of alternative solutions prior to the determination of any extensive intervention to the interiors. Any proposed internal refurbishment must also ensure a high quality design that also includes robust interpretative elements to ensure the ongoing interpretation of the early history of Wilkinson House.

However, Urbis disagrees that the interior layout of the flats are a key component that contribute to the significance of Wilkinson House. Instead, it is considered that the entrance lobby and lounge hall should be conserved and retained. However, greater provision for adaptive reuse should be given to the former internal layouts of the former flats.

As previously addressed, under separate letter, the CMP endorses *adaptive reuse*, not *facadism*. It is the intent that any future adaptive reuse of Wilkinson House will provide for the legacy of the building to be retained, while also continuing to serve SCEGGS Darlington campus for the foreseeable future. The significance of Wilkinson House is not just vested in its tangible fabric, namely those elements which reflect the original building design by Emil Sodersten, but also in the intangible aspects as they relate to the association and ongoing educational use by SCEGGS Darlington since 1960. It is important that a balance between the identified heritage values of the place, both tangible and intangible are acknowledged and met through any future adaptive reuse of the building.

Gradings of Significance

CoS provided comment on a number of elements within the Part 2 CMP in relation to the grading of the elements of Wilkinson House. The below table provides the commentary provided by CoS along with Urbis' response. It should be noted that the elements and spaces of Wilkinson House have been graded according to a different criteria than that used within the GML CMP. As a result of the feedback from CoS, some gradings have been revised and clarified. Refer to Sections 6.5 and 6.6 of the Part 2 CMP which incorporates these changes.

As noted in response to the comments on the Part 1 CMP, minor adjustments have been made to the definitions of each of the gradings of significance to clearly delineate the difference between the gradings.

Council Comments			Urbis Comment
Fabric of Wilkinson House	GML 2001	Urbis 2021	
Exterior			
<i>Roof</i>	<i>High</i>	<i>Moderate</i>	The outer form of the roof is ranked as being of high significance, while the inner face is ranked as being Moderate. It is considered that the outer half hipped roof with sprocketed eaves form is the intrinsic element of significance of the building, not necessarily the fabric itself.
<i>Roof structure</i>	<i>High</i>	<i>Moderate</i>	A grading of Moderate significance for the roof structure and terrace space has been given as they are not considered to be a key element of the place's significance, however, instead they contribute to the overall significance of the place.
<i>Roof terrace space</i>	<i>High</i>	<i>Moderate</i>	
<i>Marseille terracotta roof tiles</i>	<i>Moderate</i>	<i>Little</i>	The existing terracotta tiles are later fabric. The original drawings of Emil Sodersten show a vertically expressed cladding which does not demonstrate the existing Marseille terracotta roof tiles. The original roof tiles were likely Roman or Spanish in profile.
<i>Balconies</i>	<i>High</i>	<i>Moderate</i>	A grading of Moderate significance has been given to the balconies as the spaces themselves are not considered to be a key element of the place's significance, however, instead contributes to the overall significance of the place. The balcony openings, on the other hand, with decorative columns, barley twist arches and lintels are considered to be of High significance as they form part of the overall exterior of the building which is ranked as being of High significance.
<i>Enclosed balconies</i>	<i>High</i>	<i>Little</i>	The spaces of the enclosed balconies at the first floor have been graded as being of Little significance due to the degree of

Council Comments			Urbis Comment
Fabric of Wilkinson House	GML 2001	Urbis 2021	
			change which is one step down from the balconies that remain intact.
<i>West elevation</i>	<i>High</i>	<i>Moderate</i>	The West elevation itself does not receive an individual grading in the GML CMP, instead only the light well and roof profile is specifically noted as being of High significance. Given that the west elevation is a secondary elevation and is not of the high quality design of the other elevations, a Moderate grading of this elevation is appropriate.
<i>Double hung timber sash windows on east half of south elevation, west elevation and in lightwell</i>	<i>High</i>	<i>Moderate</i>	This grading has been amended to not include the windows on the east half of the south elevation, which are now ranked as being of High significance. See comment above regarding West elevation grading of fabric which includes windows on this elevation
<i>Wilkinson House lettering</i>	<i>High</i>	<i>Little</i>	This element has been regraded to be of Moderate significance
<i>SCEGGS school crest</i>	<i>High</i>	<i>Little</i>	This element has been regraded to be of Moderate significance
<i>Rendered columns to basement elevation</i>	<i>High</i>	<i>Moderate</i>	The north elevation of the basement is a simple design in comparison to the upper level facades of the building and hence have been given a Moderate grading.
<i>Original light well structure and form</i>	<i>High</i>	<i>Moderate</i>	The original light well, like the west elevation, is considered to be of lesser significance than the north, east and south elevations, as discussed previously.

Council Comments			Urbis Comment
Fabric of Wilkinson House	GML 2001	Urbis 2021	
Interior			
<i>Timber floor structure including bearers and joists</i>	<i>High</i>	<i>Moderate</i>	A grading of Moderate significance has been given as the floor structure is not considered to be a key element of the place's significance, however, instead contributes to the overall significance of the place.
<i>Central staircase, timber balustrade and terrazzo flooring from ground level to level 2</i>	<i>High</i>	<i>Little</i>	Incorrect. These elements were given a Moderate grading.
<i>All balcony elements include concrete floors, stone threshold, timber boarded ceilings</i>	<i>High</i>	<i>Moderate</i>	Refer to previous comment on balconies.
<i>Original decorative plaster ceilings in former lounge rooms and bedrooms</i>	<i>High</i>	<i>Moderate</i>	All of these elements have been regraded as Little significance, following review and recognition of the overall flat layout of each of the three levels being considered of Little significance.
<i>Original decorative plaster cornices</i>	<i>High</i>	<i>Moderate</i>	
<i>All original timber doors (including hardware)</i>	<i>High</i>	<i>Moderate</i>	
<i>All original timber skirtings, architraves and picture rails</i>	<i>High</i>	<i>Moderate</i>	
<i>Original timber floorboards</i>	<i>High</i>	<i>Moderate</i>	



Council Comments			Urbis Comment
Fabric of Wilkinson House	GML 2001	Urbis 2021	
<i>Configuration of original garage spaces and shop</i>	<i>Moderate</i>	<i>Little</i>	Incorrect. The GML CMP ranks the spatial configuration of the garage spaces as being of Low significance. Only the shop is given a Moderate ranking. As noted previously, the shop space no longer bears any resemblance to its original use and hence, has been graded as Neutral.
<i>Staircase vestibule</i>	<i>High</i>	<i>Moderate</i>	The staircase vestibule has been given a Moderate grading as it is not considered to be a key element of the place's significance, however, instead contributes to the overall significance of the place.
<i>Existing floor layout</i>	<i>Moderate</i>	<i>Little</i>	Since the writing of the 2001 GML CMP, the identified significance of Wilkinson House has changed, largely due to changes since 2001 and the passing of 20 years in which the association with SCEGGS Darlinghurst has grown stronger. The existing modified floor layouts are considered to be of Little significance, as the original flat configuration is difficult to interpret in its current form.
<i>Former office and telephone booths</i>	<i>Moderate</i>	<i>Little</i>	The former office and telephone booth spaces have been altered over time and currently only serve a utilitarian purpose as services cabinets and are only considered to be of Little significance. The timber doors and architraves, on the other hand, are of High significance.
<i>Terrazzo stairs in stair vestibule</i>	<i>High</i>	<i>Moderate</i>	The terrazzo stairs have been given a Moderate grading as it is not considered to be a key element of the place's significance, however, instead contributes to the overall significance of the place.

The CoS letter also included a list of fabric that was noted to be extant original internal fabric of Wilkinson House having a grading of little significance. Comments are provided against the list of elements below, however, it should be noted that many of these elements are not listed as being of Little significance, however were individually given a Moderate significance ranking.

Council Comment	Urbis Comment
<p>Common areas</p> <ul style="list-style-type: none"> ▪ Original staircase ▪ Off-white terrazzo for staircase, treads and risers ▪ Timber baluster with timber posts, rails and timber infill panels –potentially walnut ▪ Corridors feature same dentil cornices, timber skirting boards and architraves 	<p>This is incorrect, however, the draft version of the CMP issued for review did contain formatting errors within the Schedule of Significance Elements which made it appear these elements were listed as being of Little significance. The CMP recognises these elements which are contained in the staircase and its vestibules as being of Moderate significance not Little. The error in formatting has been amended so the correct attributed significance is now clear.</p>
<p>Basement</p> <ul style="list-style-type: none"> ▪ Original shop walls 	<p>The basement space of Wilkinson House has been variously altered over its history. The existing basement spaces have been largely altered from their original use as garages and a small shop front.</p> <p>The existing space of the former corner shop has been the location of fire services since at least the early 2000s. The original shop space has not been identified as a key element of the buildings significance. Furthermore, no historical research has not found any reference to the use of the shop.</p>
<p>Ground Floor</p> <ul style="list-style-type: none"> ▪ Original layout and detailing largely retained ▪ Decorative plaster ceilings ▪ Cornices ▪ Timber skirting boards ▪ Picture rails ▪ Architraves ▪ Original lounge room at the southern end ▪ Original hallway layouts 	<p>This list is incorrect.</p> <p>All fabric that is located within the former flats and the secondary corridors are graded as being of little significance as previously discussed.</p> <p>All fabric that relates to the balconies including floor, ceilings, thresholds, doors and highlights are listed as being of Moderate significance.</p>

Council Comment	Urbis Comment
<ul style="list-style-type: none"> ▪ Balconies have retained their original painted concrete floors, timber boarded ceilings and stone thresholds ▪ All balconies retain their original multi-pane timber French doors, with single pane highlights ▪ Timber floors and floor structure 	
<p>Level 1 and Level 2</p> <ul style="list-style-type: none"> ▪ Central layout of hallways and the central staircase ▪ Decorative plasterwork ▪ Nibs and bulkheads retained where internal walls have been demolished ▪ Original balcony spaces ▪ Original windows ▪ Timber floors 	<p>This list is incorrect. The original timber windows are ranked as being of High significance on the north, east and south facades, while those on the west façade are Moderate.</p> <p>The original unaltered balcony spaces, as well as the staircase and vestibules are graded as being Moderate.</p> <p>The decorative plasterwork that remains in the former flats of Level 1 have been graded as Little, due to the reduced integrity of these overall spaces. The existing floor layout of nibs and bulkheads are ranked as being of little significance, as previously discussed.</p>

POLICIES

The document provided by CoS provided a list of policies grouped under two headings:

CMP Policies allowing change, damage, alteration, removal and demolition of high and exceptional significance fabric

and

CMP Policies treating moderate significance fabric the same as little and intrusive fabric

The policies that were noted by CoS under these two categories are provided in the table below with comments provided by Urbis.

Policy		Urbis comment
<i>CMP Policies allowing change, damage, alteration, removal and demolition of high and exceptional significance fabric</i>		
Policy 14	Unless otherwise stated in these policies, surviving original and early elements and	This policy does not allow change, damage or alteration, apart from retention and

Policy		Urbis comment
	fabric identified as having high significance must be retained intact, and conserved	conservation, except where permitted by other specific policies.
Policy 16	Where elements of exceptional and high significance have been damaged, they are to be repaired with sympathetic materials in preference to replacement. Significant elements should be repaired in-situ wherever possible.	This policy too provides guidance for the repair of elements of exceptional and high significance.
Policy 17	If changes to elements of exceptional and high significance are required, they should be carefully considered and the approach should be one of minimal intervention; as much as necessary, as little as possible.	This policy provides for the allowance of change, however, any change would need to be carefully considered and be of minimal intervention. This is a standard approach to fabric of significance. It does not allow change that would be detrimental to the significance of the item and any change would be informed by the other policies within the CMP
Policy 19	Any elements of significance proposed for demolition, removal or alteration, should be subject to archival photographic recording, copies of which should be retained on site and provided to the relevant consent authorities. This should include photography and / or measured drawings as deemed necessary. Archival recordings should be undertaken in accordance with the former NSW OEH Heritage Division's Guidelines for 'Photographic Recording of Heritage Items Using Film or Digital Capture'.	This is a standard policy that applies to any changes proposed to the site. The policy does not specifically allow change, rather it requires that change is recorded.
Policy 23	The future use of the building should be compatible with its conservation and ideally will facilitate its ongoing use for the SCEGGS Darlinghurst campus and for education or related purposes. Changes to the fabric and spaces that arise from pedagogical requirements should be made with due regard to the significance of the existing fabric and spaces.	This policy specifically notes that changes proposed to facilitate a change of use must have regard for the significance of the existing fabric and spaces. It does not promote changes that would be detrimental.

Policy		Urbis comment
Policy 24	Any proposed use of Wilkinson House should be compatible with the identified heritage values and significance of the building. Uses which require an unacceptable degree of intervention for upgrade to building compliance would not be acceptable.	This policy does not endorse changes that would be detrimental to the place, and specifically notes that unacceptable degrees of intervention are not acceptable.
Policy 26	New and future uses should interpret the original division of spaces and levels of the building, such as the incorporation of ceiling or floor inlays.	This policy ensures that if any changes are proposed to the interiors that appropriate interpretation of the original spaces and levels are accounted for.
Policy 27	New internal fit outs to Wilkinson House are acceptable provided the identified heritage values and significance of Wilkinson House are maintained or interpreted.	This policy allows for new internal fitouts of Wilkinson House, which is an acceptable policy given that any change would need to ensure the retention of heritage values and significance of Wilkinson House.
Policy 45	Any original fabric removed from either the south or west elevations should be reused within the building or salvaged for future reinstatement or for use in repairs.	It is noted in the CMP that the west façade is of lesser significance (Moderate) than the other 3 facades of the building and hence, allowance for a greater degree of change. The south elevation, while of High significance, has had the most degree of intervention. Some change is allowed, so long as it does not have a negative heritage impact on the place. This policy further communicates that any elements removed must be salvaged and reused on the site.
Policy 50	...Removal/ infill of balconies is able to be supported, where required to facilitate open plan internal teaching spaces	This policy contains more information than what is extracted here. This policy has been included as there needs to be a degree of flexibility in terms of both retaining the identified heritage values of the place, as they related to the original design of Emil Sodersten, while also balancing the significance of the building to SCEGGS and ensuring that the building retains an ongoing use. This policy makes specific parameters by which the balconies could be removed, interpreted and fabric, such as the French doors, salvaged for reuse within the building, however only after consideration of

Policy		Urbis comment
		other alternatives that would result in their retention.
Policy 51	... The roof should preferably be maintained and conserved. Where a new roof is proposed, new works should maintain the expressed outer roof form, boarded eaves and decorative vent panels	As previously discussed, it is the outer roof form that is considered to be of intrinsic significance to the overall design and significance of the building, not necessarily the fabric itself. This policy allows for change, provided that any new roof ensures the roof form is maintained and interpreted along with the boarded eaves with decorative vent panels.
Policy 66	The original staircase and its associated vestibules should in the first instance be retained. If its removal is required to ensure the ongoing use of the place for educational purposes...	Again, this policy allows for a degree of flexibility, provided that appropriate interpretation and salvage of elements is explored.
Policy 67	... Alterations to the floor layout are acceptable...	This policy also contains further information that is intrinsic to its understanding. The full policy notes that the floor layout has been degraded overtime and is not considered to be an intrinsic component of the significance of Wilkinson House. Any alterations proposed must also incorporate appropriate interpretation of the original floor layout.
Policy 68	If changes are proposed to the interiors that would remove the original skirtings, architraves and picture rails, they should be salvaged...	Again, this policy also states that these elements should be in the first instance reused on the site or sold to a second-hand materials dealer. While these elements are original, they are common elements found within Inter War apartment buildings. These elements are ranked as being Moderate significance, and as such do not demonstrate a key aspect of the significance of the place. Change is allowed to these elements as long as its does not adversely affect the heritage values of the place.

Policy		Urbis comment
Policy 86	Original doors and windows on the north, east and south elevations identified as being of high significance are to be retained and repaired in preference to removal and/or replacement. Where replacement is unavoidable, any new elements should be date stamped.	<p>Amendments have been made to this policy to specify that any new doors and windows need to accord with the original design intent.</p> <p><i>Policy 86 Original doors and windows on the north, east and south elevations identified as being of high significance are to be retained and repaired in preference to removal and/or replacement. Where replacement is unavoidable, any new elements should be date stamped and should accord with the original design intent of Emil Sodersten.</i></p>
Policy 116	Preservation, restoration and reconstruction of key significant elements, areas and fabric are the preferred method of interpreting important attributes and associations of the place. Where adaptation is part of the conservation work, measures should be incorporated to show the location, character and/or role of removed or altered elements, where appropriate.	This policy is not endorsing detrimental change to elements of high significance. Instead it is providing measures for appropriate interpretation which applies to all significant fabric.
<i>CMP Policies treating moderate significance fabric the same as little and intrusive fabric</i>		
Policy 18	Intervention for purposes other than conservation of the fabric is to occur in areas of lower (moderate, little and intrusive) rather than higher (high) significance	This policy has not been altered. As noted in Policy 12 change is allowed to elements of Moderate significance so long as it does not adversely affect values and fabric of high significance. Fabric of moderate significance do contribute to the place's overall heritage significance, but do not represent a key aspect of significance of the place. It is noted that future change will be subject to assessment and is required to be justified via a Development Application and Heritage Impact Statement.
Policy 33	Intervention for purposes other than the conservation of building fabric should occur in areas of Moderate, Little, Neutral or Intrusive significance.	Again, this policy has not been changed, as per comments above.



CONCLUSION

We hope the above clarifications to CoS comments provide sufficient response to the comments raised in relation to the Part 2 CMP.

We welcome any further discussion on the Part 2 CMP following further consultation with CoS and review by DPIE prior to its finalisation and lodgement with the Stage 1 DA for the adaptive reuse of Wilkinson House.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Keira Kucharska". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Keira Kucharska
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Reviewed and endorsed by

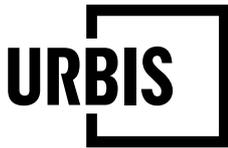
A handwritten signature in black ink, appearing to read "Stephen Davies". The signature is cursive and somewhat stylized, with a long horizontal stroke.

Stephen Davies
Director | Heritage
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ATTACHMENT A

Urbis, *Response to City of Sydney Comments on SCEGGS Conservation Management Plan* (8 September 2021)



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Urbis Pty Ltd
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8 September 2021

Shiraz Ahmed
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Level 17, 4 Parramatta Square, 12 Darcy St
Parramatta NSW 2150

To whom it may concern,

RESPONSE TO CITY OF SYDNEY COMMENTS ON SCEGGS CONSERVATION MANAGEMENT PLANS

PURPOSE

Urbis has been engaged by SCEGGS Darlinghurst to prepare the following letter in response to comments received from the City of Sydney Council (CoS) following a meeting to discuss the draft Conservation Management Plans for SCEGGS Darlinghurst held on 17 August 2021. This letter has also been prepared to advise the Department of Planning, Industry and Environment (DPIE) on the outcomes of the consultation with CoS to date in relation to the preparation of the CMPs.

As per the Conditions of Consent of the SSDA 8993 Conditions A13 and B4A requires the preparation of CMPs for the SCEGGS Darlinghurst main campus and Wilkinson House as part of the Stage 1 detailed SSDA. Both CMPs are required to be prepared in consultation with Council. Draft versions of both CMPs were issued to Council on 22 July 2021 for review and comment. A meeting to discuss Councils review was held on 17 August 2021.

Urbis prepared the following notes of the meeting and issued to the participants of the meeting including CoS via email on 18 August 2021:

Both CMPs are to be updated accordingly and re-issued to CoS, prior to formally lodging the Whole Site CMP to DPIE for endorsement.

Whole Site CMP:

- *Further information required on the Old Gym Building to substantiate the grading of little significance. CMP does not currently provide sufficient information to substantiate the grading of little significance*
- *Further information required to substantiate grading of little significance to the additions to the east of Chapel Building.*
- *Policies relating to fabric of moderate significance to be revised, as current policies share similar approaches to fabric of Little, Neutral and Intrusive significance*
- *Update list of architects to include architects responsible for alterations and additions to buildings.*



Wilkinson House CMP:

- *Review works undertaken to Wilkinson House post 2002, following conversion from boarding house to existing classrooms and staff facilities and add any additional information*
- *Grading of internal layouts to be reviewed as current grading of Little significance was not considered to be appropriate. Differentiations in grading of different levels (ground, Level 1 and Level 2) should be considered given the differing integrity of fabric of the levels.*
- *Significance of existing roof tiles to be clarified.*
- *As the criteria of rarity was addressed as part of the CMP, which had not been assessed as part of the previous CMP, and the criteria of rarity was determined to be met, consideration of changing the overall significance of Wilkinson House from High to Exceptional to be considered.*
- *All policies to be reviewed to ensure consistency with Whole Site CMP policies*
- *Policies should be revised and amended having further detail on policies as they relate to fabric. GMLs 2001 CMP to be reviewed to guide this approach.*
- *Policies relating to fabric of moderate significance to be revised, as current policies share similar approaches to fabric of Little, Neutral and Intrusive significance*
- *Policies relating to fabric of High significance to be revised, as concern raised that unacceptable change is provided for by wording of policies*

Following the issue of these meeting notes, CoS issued a document entitled *Heritage comments on CMPs prepared by Urbis dated 22 July 2021 for SCEGGS Darlinghurst* (dated 18 August 2021). A copy of this letter is attached at the end of this letter. A number of the comments raised by CoS in this letter were not directly discussed during the meeting and were not Urbis' nor the other participants recollection of the discussion held.

Whilst the document dated 18 August 2021 could be considered notes prepared by CoS in preparation for the consultation meeting, CoS requested that the notes be incorporated into the record of consultation and future correspondence with DPIE.

This letter has been prepared in response to the first six (6) written comments issued by CoS, which relate to the methodology and approach to the preparation of both CMPs. The other specific and more detailed comments relating to each of the CMPs will be addressed in tandem with the updated versions of the CMPs of the SCEGGS main campus Part 1 CMP and Wilkinson House Part 2 CMP.

RESPONSE TO FIRST SIX COMMENTS FROM COS, 18 AUGUST 2021

Responses to each of the six comments raised by CoS have been addressed individually below. It is noted that these comments are prefaced by CoS raising objection to the proposed draft CMPs.

- 1. *We are advised by Urbis at our consultation that the CMPs have been guided by the proposal and it is evident in the assessment of significance, grading of significance and the conservation policies***

Urbis does not agree with this statement. It is not a true account of the consultation and Urbis did not advise the CoS in this regard.

The preparation of the CMPs came about following the issue of the development consent for SSDA 8992 dated 22 May 2020. There is no statutory requirement for a CMP to be prepared for a heritage item that is of local heritage significance at the concept approval stage, nor did the SEARS for the SSDA for the concept approval require their preparation. It should also be noted that clause 5.10(6) of



Sydney LEP 2012 does not require the preparation of a CMP prior to submitting a DA. Instead, the clause states the consent authority may require, after considering the heritage significance of a heritage item and the extent of change proposed to it, the submission of a heritage CMP before granting consent. Thereby, the preparation of the CMPs, as prepared, are consistent with the process under Clause 5.10 of the *Sydney LEP 2012*.

Urbis was engaged in late 2020 to provide heritage consultancy services to SCEGGS Darlinghurst for the preparation of the CMPs for the SCEGGS main campus and for Wilkinson House, which was prior to the commencement of the design development for Wilkinson House. Urbis has provided heritage general advisory services during the design competition undertaken between late 2020 and early 2021, which was awarded to Smart Design Studio. Therefore, general heritage guidance was provided for the design competition which resulted in the endorsement of Smart Design Studio as the project architect.

General heritage advice was provided to participants of the design competition to ensure the concept design avoided adverse impacts to the heritage values and significance fabric of Wilkinson House. The designs explored the adaptive reuse of Wilkinson House consistent with the findings of the Independent Planning Commission (IPC) in their *SCEGGS Darlinghurst Concept and Stage 1 (SSD 8993) Statement of Reason for Decision* (22 May 2020).

As acknowledged in the CMPs, the general conservation guidelines and opportunities and constraints were established to guide each of the designs. These general conservation guidelines and opportunities and constraints were developed by Urbis understanding the significance of the place and its fabric, based on our own physical investigations and familiarity with previous heritage documentation prepared for the site, including the 2001 CMP prepared by Godden Mackay Logan and the documentation prepared by TKD Architects as part of the Concept DA.

Prior to Urbis' engagement, heritage advice had been provided TKD architects. While not part of a CMP, TKD architects had undertaken a high level assessment of the significance of the site and its buildings as part of Statement of Heritage Impact (January 2019, Issue B). These gradings were reassessed as part of the CMP, given the additional research and analysis undertaken of the campus and each of the buildings which form part.

The preparation of the draft CMPs represents a formal development of the analysis and investigations that have been undertaken to date, not just by Urbis, but including previous analysis undertaken by TKD Architects as part of the Concept DA and the 2001 CMP.

Given the approval of the Concept DA, Urbis' place in preparing the CMPs for the Whole Site and Wilkinson House needed to acknowledge the determinations that had been made to date regarding the site. The assessment of significance, grading of significance and conservation policies have not been guided by the proposal. The assessment and gradings of significance have been based on additional analysis and research of the buildings including multiple site inspections and review of interventions made throughout the site. The conservation policies were then developed to respect the assessed significance. The policies acknowledge the approved changes to the site, while ensuring the best heritage practice approach. The development of the policies in each of the CMPs are cognisant of the proposal to the site and seek to ensure that both the heritage significance of the site and its buildings are maintained and conserved, while also providing guidance for the appropriate management of heritage significance and development of any proposed future adaptive reuse of the buildings, where appropriate.

2. *The Wilkinson House CMP is inconsistent with the existing 2001 CMP for Wilkinson House by Godden Mackay Logan.*

It is industry best practice that a CMP should be updated every 5-10 years, or in tandem with any proposed major redevelopment of a place. It is not necessary for a new CMP for a site to be consistent with an old CMP. In preparing a CMP, previous CMPs should be referred to and understood. However, any new and/or updated CMP should undertake further analysis and research

to determine if any changes have occurred which alter the previously determined significance of the place and its fabric. It should acknowledge the changes that have occurred to the place's fabric and use and in turn develop conservation policies that are appropriate and relevant in order to conserve and maintain that understood significance.

The CMP prepared in 2001 for Wilkinson House by Godden Mackay Logan was prepared prior to the conversion of Wilkinson House from a boarding house to the current classroom and staff facilities . The 2001 CMP was developed as the result of the proposed change of use of the building, as the boarding house use was no longer viable and a new use needed to be determined for the building. The 2001 CMP was a professional product of its time which informed the development and adaptation to Wilkinson House at that time, however it is now over 20 years old. At the time of writing the 2001 CMP, SCEGGS Darlinghurst had been in possession of the building for 40 years, during which time the building has been used as a boarding house. The Adaptive reuse of the Wilkinson House from boarding house to classrooms and staff facilities was necessary due to the changing needs of the School and the 2001 CMP was developed in light of the need for the adaptive reuse of the building.

Following the issue of the 2001 CMP, alterations and additions were undertaken to Wilkinson House to convert it from a boarding house into the existing classrooms and staff facilities. These works involved removal of internal walls to develop a more open plan layout suitable to classrooms, particularly across Levels 1 and 2 and removal of walls on the ground floor to establish larger offices. Both original and altered bathrooms and kitchens were also removed and new fire services reticulated throughout the building. The resulting internal layout has heavily reduced the interpretation and legibility of Wilkinson House as a former flat building, particularly as it is experienced internally. Minimal modifications occurred to the exterior of the building.

The primary changes to the statement of significance, the grading of elements and in turn the conservation policies for Wilkinson House are due to the reassessment of significance of the place. Since its construction in 1928, Wilkinson House has been used by SCEGGS Darlinghurst and associated with educational use for more than 60 years of its 93 years of existence. The significance of Wilkinson House is not just vested in its tangible fabric, namely those elements which reflect the original building design by Emil Sodersten, but also in the intangible aspects as they relate to the association and ongoing educational use by SCEGGS Darlinghurst since 1960. The heritage significance of Wilkinson House has been determined following a reassessment of the place against the seven criteria for assessing heritage significance, as established by the Heritage Council of NSW. SCEGGS association and ongoing use of the site is recognised as contributing to Wilkinson Houses' historical, associative and social significance, while the association of the place with the architect Emil Sodersten also contributes to the place's historical, aesthetic, associative, rarity and representative values. The approach to how Wilkinson House is conserved and maintained into the future is thus dependant on ensuring the heritage significance of the site is respected and ensuring that any future change is managed appropriately.

The 2001 CMP also acknowledges that the sites significance is vested in associations with Emil Sodersten and its association and ongoing use by SCEGGS. In Section 5.2.2 of the 2001 CMP, a discussion of the conservation options for Wilkinson House was included. The discussion noted that the most appropriate use for the Wilkinson House would be for its originally designed purpose, ie. a residential flat building. However, given the adaptation of the building to boarding house use which has resulted in the removal of a number of internal features and the need to upgrade the building for contemporary needs, this reinstatement of use would require further intervention, although likely to a lesser extent than other uses. However, the significance of Wilkinson House for its ongoing association with SCEGGS Darlinghurst was acknowledged and any proposed use should continue to play a role in the School's future plans and therefore its continued association with the School. It concludes that "Adaptively re-using the building is therefore appropriate provided that the adaptation is respectful of its former use and allows for its interpretation". The significance of Wilkinson House for its ongoing association with SCEGGS Darlinghurst has only strengthened over the last 20 years.

Similar to the change of use catalyst that required the preparation of the 2001 CMP, the 2021 CMP has been prepared in the context of the 2040 Masterplan for SCEGGS Darlinghurst, which provides the long term vision for the staged redevelopment of the main campus over the next 20 years. The adaptive reuse of Wilkinson House forms part of this Masterplan. Wilkinson House does not provide either the current nor projected requirements of the school. The development of the CMP for Wilkinson House thus will be the guiding document for the future adaptive reuse of the building acknowledging its significance in terms of its association with Emil Sodersten and ever growing association with SCEGGS Darlinghurst, and facilitating its ongoing conservation and use.

3. *The CMPs are inconsistent with the best practice conservation principles of the Burra Charter .*

Urbis disagrees with this preparatory note and can confirm that the CMPs are consistent with the best practice conservation principles of the *Burra Charter*.

The *Burra Charter* is a process that takes you on a journey from understanding a places' significance, the development of policy and ultimately the management of the significance of the place in accordance with those policies. The *Burra Charter* is not a rulebook, but a guideline to thinking about the management of a place. In preparing the CMPs, Urbis has have followed the process of the *Burra Charter* to understand the place, assess its cultural significance, identify all factors and issues related to its management and the development of appropriate policies to ensure that the cultural significance of the place is managed into the future. We have inspected documents relating to the item and have undertaken numerous site inspections and detailed assessments. As noted above, the cultural significance of a place is not just vested into its tangible fabric, but also in the intangible aspects of the place.

Of particular note, in relation to the discussion of the adaptive reuse of Wilkinson House, the *Burra Charter* provides principles for the adaptation of places of cultural significance. A places' cultural significance means the aesthetic, historic, scientific, social or spiritual values for past, present and future generations. The cultural significance of Wilkinson House is embodied in its Statement of Cultural Significance. The cultural significance of a place itself is embodied in its fabric, setting, use, associations, meaning, records, related places and related objects.

Any proposed changes or adaptations to a place of cultural significance should always aim to retain and conserve the cultural significance of a place (Article 2). Any changes that are proposed to a place of cultural significance should always understand the places cultural significance first, develop policies for the management of the place and finally manage the place in accordance with these policies (Article 6.1). Policies for the management of the place must be based on an understanding of the places cultural significance (Article 6.1) and should consider other factors affecting the future of the place (ie. owners needs, resources, external constraints and physical condition) (Articles 6.2 and 6.3).

Where a change of use is proposed to a place, any new use should be compatible with the place (Article 7.2) and should involve minimal change to significant fabric, respect associations and meanings and where possible should provide for continuation of activities and practices that contribute to the cultural significance of the place. Adaptation of a place is acceptable only where the adaptive use has minimal impact on the cultural significance of the place (Article 21.1) and should involve minimal change to significant fabric, achieved only after consideration of alternatives (Article 21.2).

The significance of Wilkinson House has been determined through an examination of the places fabric, use, associations and setting when identifying significant aspects of the place and in turn the development of appropriate management policies to guide any future change to the place.

4. *The CMPs are inconsistent with the guidelines for assessing significance in HNSW guiding document.*

Urbis disagrees within this statement. Both CMPs have been developed with reference to the guidelines for assessing significance as defined by the Heritage Council of NSW in their publication

Assessing Heritage Significance (2001). The assessment of significance contained within both CMPs, assess the whole site and Wilkinson House against the set of seven criteria for assessing heritage significance. The grading of fabric has followed the general approach of the gradings of significance as developed by the Heritage Council of NSW, with the addition of a Neutral grading and minor adjustments to the grading justifications (these are discussed under separate cover). It is acknowledged in the *Assessing Heritage Significance* guidelines that the gradings of significance “may be modified to suit its application to each specific item” (p. 11), thereby permitting differing interpretations of what grading of significance an element may fall within and allowing for change to the definitions of the gradings. Urbis will ensure that the updated CMPs clearly define the grading of elements.

5. The CMPs are inconsistent with the 2021 Statement of Best Practice for Conservation Management Plans by Heritage Council of NSW which includes the following:

The Heritage Council of NSW, in consultation with the heritage sector, found that a good CMP:

- is not written with the purpose of justifying a specific project or development, although the plan should not ignore possible projects

Conservation management plans guide the use, management and change of heritage items. They should achieve the best possible conservation of heritage significance within the context of the real-world management circumstances of the item. A plan must not be written:

- with the purpose of justifying a specific project or development

- to exclusively meet the needs of users (e.g. heritage authority, owner/manager, maintenance staff)

It is noted that the 2021 Statement of Best Practice for Conservation Management Plans have not as yet been publicly made available and it is that it may be released publicly following the conclusion of the series of webinars occurring in late August 2021. As of the date of this letter, these documents have not been released. However, Urbis has received a copy of the Best Practice Guidelines and are familiar with their content.

It should be noted that the Best Practice Guidelines were only released during August 2021 (to a limited audience who were able to attend the webinars) and the CMPs for SCEGGS were prepared prior to the development of these guidelines. Despite this, it is Urbis' opinion that both CMPs reflect the best practice guidelines and meet their stated criteria.

It is agreed that a good CMP is not written with the purpose of justifying a specific project or development, however, as the guidelines state, the plan should not ignore possible projects.

The concept approval for SSD 8993 determined by the IPC considered input from the public, from the City of Sydney and the DPIE in great detail before granting consent.

Given the context in which the CMPs for SCEGGS Darlinghurst have been prepared, consideration of the approved Concept DA for the redevelopment of the SCEGGS Darlinghurst main campus needs to be acknowledged. The granting of consent of the Concept DA, included consent for the demolition of a number of buildings and structures across the SCEGGS main campus including the Old Gym Building, additions to Chapel Building and additions to Barham, the Old Science Building and Library Building. This approval for the concept demolition of these buildings and structures is further outlined in the summary statements from the IPC in *SCEGGS Darlinghurst Concept and Stage 1 (SSD 8993) Statement of Reason for Decision* (22 May 2020, p. 21) which stated:

The Commission agrees with the Applicant's submissions and the Department's conclusions with regards to the Old Gym, Old Science Building, Library Building and

addition to the Chapel/Barham House in paragraphs 109 to 113 above and support the component of the concept plan seeking demolition of those buildings. The Commission approves the demolition of these buildings in the Concept Proposal.

Granted, the approval for these buildings demolition does not negate the need for an assessment of significance of them and their contribution to the overall significance of the SCEGGS campus. The SCEGGS whole site CMP does just that and found that these buildings were of varying significance primarily due the substantial alterations and additions that have occurred to these structures over time, their diminished integrity, lesser architectural merit and confusing interpretation.

It is thus considered appropriate that if there was a proposal to remove these buildings and structures, this would be permissible, given the significance of the structures, as outlined in the SCEGGS whole site CMP policies.

6. The CMPs endorse facadism which is not best practice heritage conservation.

The CMPs define the significance, develop policies and provided guidelines for the future management of the site in accordance with established significance and conservation policies. The CMPs do not and should not promote a specific design response for future development and use.

In its most basic definition, *facadism* is the architectural and construction practice where the façade of a building is conserved and a new building is constructed behind the original façade. The practice and definition of facadism is the subject of contemporary debate and is frequently evoked in the context of adaptive reuse projects.

It is assumed that this comment generally applies to Wilkinson House, due to the assessed significance of the majority of the interiors of Wilkinson House being graded of lesser heritage significance than the external elements of the building and the allowance for a degree of change to the interior of the building within the conservation policies.

The gradings of significance and conservation policies do not endorse a facadism approach. Any proposed adaptive reuse of Wilkinson House is still required to ensure that that significant elements of Wilkinson House are either maintained and/or interpreted, while also balancing the need to ensure the ongoing and ever strengthening association with SCEGGS Darlington, which will require modifications to physical fabric. The elements of the building that have been identified as being of highest significance to the place are those that both reflect the architectural merit of Emil Sodersten's design and those that have retained a high degree of integrity.

A purely facadism approach would encourage only maintenance of the facades and would allow for an entirely new building behind, which would not reference the original building that was once contained within. The CMPs do not take that approach and instead encourage maintenance of elements that are of higher significance, while allowing for a degree of change to elements of lesser significance to ensure the interpretation of the former use as a flat building designed by Emil Sodersten is acknowledged. In particular the entrance foyer and lobby is of high significance and should be retained and conserved. Further interpretation devices may be incorporated throughout any future adaptive reuse of the building, whether they be through floor and ceiling inlays, salvage and reuse of elements or material choices for new elements that reference the original material palette.

The CMPs endorse *adaptive reuse*, not facadism, as discussed in response to comment 3. It is the intent that the any future adaptive reuse of Wilkinson House will provide for the legacy of the building to be retained, while also continuing to serve SCEGGS Darlington campus for the foreseeable future. It is important that a balance between the identified heritage values of the place, both tangible and intangible are acknowledged and met through any future adaptive reuse of the building. A significantly unsympathetic reconfigured residential flat building, as is the current situation, has not provided a well resolved school building. This adapted building is not a sustainable solution for the school, nor does it provide an example of a well resolved adaptation in physical heritage terms. At this point in the alteration of the original building it is considered poor practice to leave the building



awkwardly configured and inefficient when a new layer can be applied which has design excellence, including resolved functional design, heritage conservation and interpretation to coexist and will ensure that the associations with SCEGGS Darlinghurst are continued into the future while retaining the significance portions of the building that relate to Emil Soderstens design. Any proposed change to Wilkinson House would also have the ensure compliance with the Building Code of Australia while also ensuring minimal adverse interventions to significance fabric.

CONCLUSION

We hope that the above clarifications to the CoS comments dated 18 August 2021 provide clarity and deeper understanding of the approach employed in the preparation of the CMPS for SCEGGS Darlinghurst and Wilkinson House and compliance with the conservation principles of the *Burra Charter*, HNSW Guidelines and the Statement of Best Practice for CMPS by HNSW.

The aim of both of the CMPs are to guide the use, management and future changes to the place to achieve the best possible conservation of all of the assessed aspects of heritage significance within the context of the real-world usage and management of the place. The assessments of significance and policies developed herein recognise both the tangible and intangible heritage values of the SCEGGS Darlinghurst campus and Wilkinson House and provide guidelines for their maintenance and management.

As noted at the beginning of this letter the specific comments relating to each of the CMPs have not been addressed as part of this letter. However, these comments, as well as those noted from Urbis post the meeting with the CoS on the 17 August 2021, will be addressed in tandem with the updated versions of the SCEGGS Main Campus Part 1 CMP and Wilkinson House Part 2 CMP which will be issued in the near future.

We welcome further discussion on the CMPs to ensure that comments and issues raised by CoS are addressed and incorporated where appropriate into the final documentation prior to endorsement by the Planning Secretary and submission of the Detailed State Significant Development Application and CMP for Wilkinson House.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Keira Kucharska".

Keira Kucharska
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Reviewed and endorsed by

A handwritten signature in black ink, appearing to read "Stephen Davies".

Stephen Davies
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CC Brent Devine, Principal Planner, School Infrastructure Assessment, Department of Planning, Industry and Environment



ATTACHMENT A

City of Sydney, *CMPs prepared by Urbis dated 22 July 2021 for SCEGGS Darlinghurst (18 August 2021).*

Heritage comments on CMPs prepared by Urbis dated 22 July 2021 for SCEGGS Darlinghurst

The City raises objection to the proposed draft CMPs for the following reasons:

1. We are advised by Urbis at our consultation that the CMPs have been guided by the proposal and it is evident in the assessment of significance, grading of significance and the conservation policies
2. The Wilkinson House CMP is inconsistent with the existing 2001 CMP for Wilkinson House by Godden Mackay Logan.
3. The CMPs are inconsistent with the guidelines for assessing significance in [HNSW guiding document](#).
4. The CMPs are inconsistent with the best practice conservation principles of the Burra Charter.
5. The CMPs are inconsistent with the 2021 Statement of Best Practice for Conservation Management Plans by Heritage Council of NSW which includes the following:
 - *The Heritage Council of NSW, in consultation with the heritage sector, found that a good CMP:*
 - *is not written with the purpose of justifying a specific project or development, although the plan should not ignore possible projects*
 - *Conservation management plans guide the use, management and change of heritage items. They should achieve the best possible conservation of heritage significance within the context of the real-world management circumstances of the item. A plan must not be written:*
 - *with the purpose of justifying a specific project or development*
 - *to exclusively meet the needs of users (e.g. heritage authority, owner/manager, maintenance staff)*
6. The CMPs endorse facadism which is not best practice heritage conservation.

Additional comments for Wilkinson House CMP

1. All buildings with any assessed rarity, including Wilkinson House, should have exteriors regraded as exceptional significance, because these meet the Heritage Office definition as a "rare or outstanding element directly contributing to an items local/state significance." This includes the roof, elevations and their details.
2. The more intact original building interiors should be re-graded as high as a key part of these buildings, which are not just limited to envelope or facades, because these meet the NSW Heritage Office definition as having a "high degree of original fabric" and facadism is not a supported conservation practice to be encouraged by the CMP.
3. Surviving original and rare internal fabric has been graded as having little significance. Altered original building interiors should be re-graded at least as moderate significance, because these meet the NSW Heritage Office definition as "contributing to the overall significance of the item". The CMP has not demonstrated that these have been altered to such a degree that the original can no longer be interpreted and therefore satisfy the definition for this grading, but only shows removal of a minority of internal walls.
4. Many gradings of significance in the CMPs need to be upgraded one step.
5. There are no policies for retention of original fabric if it is not assessed as exceptional or high significance in the CMPs.
6. Moderate significance fabric is treated the same as Little and Intrusive fabric.
7. The CMPs should remove reference to conservation policies allowing for damage to features of high significance. This is not the purpose of a policy for conservation.

8. Conservation policies that apply to high gradings should also include moderate and exceptional.
9. Policy for limiting alterations should apply to fabric of little and detracting significance only and should omit moderate.
10. Section 8.6.3: Internal alteration introductory conclusions need to be reviewed significantly or removed because these conclusions are not supported by the Heritage Office grading definitions. Interiors are a key component that contribute to the significance and have not been demonstrated to have been altered beyond interpretation or restoration to have lost this significance. A CMP should not endorse facadism but provide for conservation of the building as a whole, including retention of original internal features, restoration or interpretation where possible.

Detailed comparison of grading of significance of fabric of Wilkinson House

Fabric of Wilkinson House	GML 2001	Urbis 2021
Exterior		
Roof	High	Moderate
Roof structure	High	Moderate
Roof terrace space	High	Moderate
Marseille terracotta roof tiles	Moderate	Little
Balconies	High	Moderate
Enclosed balconies	High	Little
West elevation	High	Moderate
Double hung timber sash windows on east half of south elevation, west elevation and in lightwell	High	Moderate
Wilkinson House lettering	High	Little
SCEGGS school crest	High	Little
Rendered columns to basement elevation	High	Moderate
Original light well structure and form	High	Moderate
Interior		
Timber floor structure including bearers and joists	High	Moderate
Central staircase, timber balustrade and terrazzo flooring from ground level to level 2	High	Little
All balcony elements include concrete floors, stone threshold, timber boarded ceilings	High	Moderate
Original decorative plaster ceilings in former lounge rooms and bedrooms	High	Moderate
Original decorative plaster cornices	High	Moderate
All original timber doors (including hardware)	High	Moderate
All original timber skirtings, architraves and picture rails	High	Moderate
Original timber floorboards	High	Moderate
Configuration of original garage spaces and shop	Moderate	Little
Staircase vestibule	High	Moderate
Existing floor layout	Moderate	Little
Former office and telephone booths	Moderate	Little
Terrazzo stairs in stair vestibule	High	Moderate

Downgrading of significance in the Whole site CMP

Whole Site CMP	Urbis 2021	Per Heritage Council Guidelines
Old Gym Building by John Burcham Clamp	Little	Should be at least Moderate
1920s addition to Barham by John Burcham Clamp	Little	Should be at least Moderate if not high
Wilkinson House by Emil Sodersten	High	Should be Exceptional for rarity values
Chapel building by John Burcham Clamp	High	Should be Exceptional for rarity values
Old Gym Building		
Overall form	Little	Should be at least Moderate
West Elevation	Little	Should be at least Moderate
Original windows and doors	Little	Should be at least Moderate
Original internal timber panelled doors	Little	Should be at least Moderate
Remnant original skirting and architraves	Little	Should be at least Moderate
Remnant original room layout	Little	Should be at least Moderate

Whole Site CMP

CMP Policies allowing change, damage, alteration, removal and demolition of high and exceptional significance fabric

Policy 16	Unless otherwise stated in these policies, surviving original and early elements and fabric identified as having high significance must be retained intact, and conserved
Policy 18	Where elements of exceptional and high significance have been damaged, they are to be repaired with sympathetic materials in preference to replacement. Significant elements should be repaired in-situ wherever possible.
Policy 19	If changes to elements of exceptional and high significance are required, they should be carefully considered and the approach should be one of minimal intervention; as much as necessary, as little as possible.
Policy 21	Any elements of significance proposed for demolition, removal or alteration, should be subject to archival photographic recording, copies of which should be retained on site and provided to the relevant consent authorities. This should include photography and / or measured drawings as deemed necessary. Archival recordings should be undertaken in accordance with the former NSW OEH Heritage Division's Guidelines for ' <i>Photographic Recording of Heritage Items Using Film or Digital Capture</i> '.
Policy 26.	Any proposed new uses should be compatible with the identified heritage values and significance of the building, structure or space. Uses which require an unacceptable degree of intervention for upgrade to legislative compliance would not be acceptable.
Policy 27.	Any future adaptation of the interiors of buildings of exceptional and high significance to suit new uses should aim to retain these spaces and fabric...
Policy 34	Any major works to elements of the campus of exceptional and high significance needs to be based on the results of further investigation.....

Policy 38.	Buildings and elements of exceptional and high significance should be retained and conserved where possible. Modification may be permissible subject to heritage assessment and must be subject to a detailed archival recording.
Policy 39	Substantial demolition or removal of building of high significance may in very rare circumstances be permissible subject to heritage assessment, and only if this change is required to facilitate the overall conservation and interpretation of the place in perpetuity. Any major change to these elements should be subject to a detailed options analysis to demonstrate that the proposed change or removal is necessary, and a reasonable and appropriate approach and further that the proposal has sought to mitigate heritage impacts.
Policy 40	Buildings and elements of moderate, little and neutral significance may be altered or removed as required
Policy 44	All major changes and any demolition of buildings or elements identified as, high, moderate or little significance in the CMP, and any works to buildings of exceptional significance must be subject to an archival recording. Copies of a photographic archival recording should be retained on site and issued to the relevant consent authorities. This should include photography and / or measured drawings as deemed necessary. Archival recordings should be undertaken in accordance with Heritage NSW's (former Heritage Division of Office and Environment and Heritage) Guidelines for 'Photographic Recording of Heritage Items Using Film or Digital Capture'. Archival Recording should form part of an archive of changes and development and contribute to the documentation of the school's history
Policy 47	The approved Concept DA proposes development to the east of Barham in place of the existing additions. It is critical that detailed design of this building enables the eastern façade to be retained and interpreted. Barham must remain legible in the round. Lightweight additions/links are acceptable. Any new addition to Barham should be modulated to minimise impacts of scale and bulk. Any new addition should acknowledge and reinstate of oblique views to the north façade from Forbes Street.

CMP Policies treating moderate significance fabric the same as little and intrusive fabric

Policy 20	Intervention for purposes other than conservation of the fabric is to occur in areas of lower (moderate, little and intrusive) rather than higher (high) significance
Policy 33	Intervention for purposes other than the conservation of building fabric should occur in areas of Moderate, Little, Neutral or Intrusive significance.
Policy 55	The Old Gym building overall has little significance due to the substantial alterations and additions that have been undertaken since its original construction in 1923. If the building is required to be demolished, an archival recording should be undertaken prior to its demolition.
Policy 56	The Old Science Building has moderate significance due to its architectural integrity and reflection of the development of SCEGGS during the late 1960s. However, if its demolition is proposed in order to ensure the ongoing use of the campus by SCEGGS, its demolition is acceptable, provided that an archival recording is undertaken prior to its demolition.

Wilkinson House CMPCMP Policies allowing change, damage, alteration, removal and demolition of high and exceptional significance fabric

Policy 14	Unless otherwise stated in these policies, surviving original and early elements and fabric identified as having high significance must be retained intact, and conserved
Policy 16	Where elements of exceptional and high significance have been damaged, they are to be repaired with sympathetic materials in preference to replacement. Significant elements should be repaired in-situ wherever possible.
Policy 17	If changes to elements of exceptional and high significance are required, they should be carefully considered and the approach should be one of minimal intervention; as much as necessary, as little as possible.
Policy 19	Any elements of significance proposed for demolition, removal or alteration, should be subject to archival photographic recording, copies of which should be retained on site and provided to the relevant consent authorities. This should include photography and / or measured drawings as deemed necessary. Archival recordings should be undertaken in accordance with the former NSW OEH Heritage Division's Guidelines for ' <i>Photographic Recording of Heritage Items Using Film or Digital Capture</i> '.
Policy 23	The future use of the building should be compatible with its conservation and ideally will facilitate its ongoing use for the SCEGGS Darlinghurst campus and for education or related purposes. Changes to the fabric and spaces that arise from pedagogical requirements should be made with due regard to the significance of the existing fabric and spaces.
Policy 24	Any proposed use of Wilkinson House should be compatible with the identified heritage values and significance of the building. Uses which require an unacceptable degree of intervention for upgrade to building compliance would not be acceptable.
Policy 26	New and future uses should interpret the original division of spaces and levels of the building, such as the incorporation of ceiling or floor inlays.
Policy 27	New internal fit outs to Wilkinson House are acceptable provided the identified heritage values and significance of Wilkinson House are maintained or interpreted.
Policy 45	Any original fabric removed from either the south or west elevations should be reused within the building or salvaged for future reinstatement or for use in repairs.
Policy 50	...Removal/ infill of balconies is able to be supported, where required to facilitate open plan internal teaching spaces
Policy 51	... The roof should preferably be maintained and conserved. Where a new roof is proposed, new works should maintain the expressed outer roof form, boarded eaves and decorative vent panels
Policy 66	The original staircase and its associated vestibules should in the first instance be retained. If its removal is required to ensure the ongoing use of the place for educational purposes...
Policy 67	... Alterations to the floor layout are acceptable...
Policy 68	If changes are proposed to the interiors that would remove the original skirtings, architraves and picture rails, they should be salvaged...
Policy 86	Original doors and windows on the north, east and south elevations identified as being of high significance are to be retained and repaired in preference to removal and/or replacement. Where replacement is unavoidable, any new elements should be date stamped.
Policy 116	Preservation, restoration and reconstruction of key significant elements, areas and fabric are the preferred method of interpreting important attributes and associations

	of the place. Where adaptation is part of the conservation work, measures should be incorporated to show the location, character and/or role of removed or altered elements, where appropriate.
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CMP Policies treating moderate significance fabric the same as little and intrusive fabric

Policy 18	Intervention for purposes other than conservation of the fabric is to occur in areas of lower (moderate, little and intrusive) rather than higher (high) significance
Policy 33	Intervention for purposes other than the conservation of building fabric should occur in areas of Moderate, Little, Neutral or Intrusive significance.

List of extant original internal fabric of Wilkinson House graded as having Little Significance

Common areas

- Original staircase
- Off-white terrazzo for staircase, treads and risers
- Timber baluster with timber posts, rails and timber infill panels –potentially walnut
- Corridors feature same dentil cornices, timber skirting boards and architraves

Basement

- Original shop walls

Ground Floor

- Original layout and detailing largely retained
- Decorative plaster ceilings
- Cornices
- Timber skirting boards
- Picture rails
- Architraves
- Original lounge room at the southern end
- Original hallway layouts
- Balconies have retained their original painted concrete floors, timber boarded ceilings and stone thresholds
- All balconies retain their original multi-pane timber French doors, with single pane highlights
- Timber floors and floor structure

Level 1 and Level 2

- Central layout of hallways and the central staircase
- Decorative plasterwork
- Nibs and bulkheads retained where internal walls have been demolished
- Original balcony spaces
- Original windows
- Timber floors

Priyanka Misra
Heritage Specialist
City of Sydney



ATTACHMENT B

Urbis, Response to City of Sydney Comments on SCEGGS Conservation Management Plan – Whole Site (8 September 2021)



**ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000**

URBIS.COM.AU
Urbis Pty Ltd
ABN 50 105 256 228

8 September 2021

Shiraz Ahmed
Team Leader Infrastructure Management
Level 17, 4 Parramatta Square, 12 Darcy St
Parramatta NSW 2150

To whom it may concern,

RESPONSE TO CITY OF SYDNEY COMMENTS ON SCEGGS CONSERVATION MANAGEMENT PLANS

PURPOSE

Urbis has been engaged by SCEGGS Darlinghurst to prepare the following letter in response to comments received from the City of Sydney Council (CoS) following a meeting to discuss the draft Conservation Management Plans (CMPs) for SCEGGS Darlinghurst Campus held on 17 August 2021. This letter has also been prepared to advise the Department of Planning, Industry and Environment (DPIE) on the outcomes of the consultation with CoS to date in relation to the preparation of the SCEGGS Darlinghurst Campus CMP Part 1. Comments received directly in relation to the draft Wilkinson House Part 2 CMP are to be addressed in a separate letter.

As per the Conditions of Consent of the SSDA 8993 Condition A13 requires the preparation of a CMP for the SCEGGS Darlinghurst Campus prior to the lodgement of any future development application for subsequent stages. A draft version of the Part 1 CMP was issued to Council on 22 July 2021 for review and comment. A meeting to discuss Councils review was held on 17 August 2021.

Urbis prepared the following notes of the meeting as they relate to comments regarding the Part 1 CMP and issued to the participants of the meeting including CoS via email on 18 August 2021:

Both CMPs are to be updated accordingly and re-issued to CoS, prior to formally lodging the Whole Site CMP to DPIE for endorsement.

Whole Site CMP:

- *Further information required on the Old Gym Building to substantiate the grading of little significance. CMP does not currently provide sufficient information to substantiate the grading of little significance*
- *Further information required to substantiate grading of little significance to the additions to the east [west] of Chapel Building.*
- *Policies relating to fabric of moderate significance to be revised, as current policies share similar approaches to fabric of Little, Neutral and Intrusive significance*
- *Update list of architects to include architects responsible for alterations and additions to buildings.*



Following the issue of these meeting notes, CoS issued a document entitled *Heritage comments on CMPs prepared by Urbis dated 22 July 2021 for SCEGGS Darlington* (dated 18 August 2021).

This letter has been prepared to respond to the written comments issued by CoS, particularly surrounding the specific comments raised on the Part 1 CMP. Responses to general comments relating to both CMPs have been addressed under separate cover and a response to comments relating to the Wilkinson House Part 2 CMP are being prepared separately.

References to the Part 1 CMP refer to the updated version of the document, dated 8 September 2021.

RESPONSE TO PART 1 CMP COMMENTS AS PREPARED BY URBIS, 18 AUGUST 2021

The following comments provide responses to the notes as prepared by Urbis following the meeting held with Council on 17 August 2021.

Further information required on the Old Gym Building to substantiate the grading of little significance. CMP does not currently provide sufficient information to substantiate the grading of little significance.

Given the context in which the CMPs for SCEGGS Darlington have been prepared, consideration of the approved Concept DA for the redevelopment of the SCEGGS Darlington main campus needs to be acknowledged. The granting of consent of the Concept DA, included consent for the demolition of a number of buildings and structures across the SCEGGS main campus including the Old Gym Building, additions to Chapel Building and additions to Barham, the Old Science Building and Library Building. This approval for the concept demolition of these buildings and structures is further outlined in the summary statements from the IPC in *SCEGGS Darlington Concept and Stage 1 (SSD 8993) Statement of Reason for Decision* (22 May 2020, p. 21) which stated:

The Commission agrees with the Applicant's submissions and the Department's conclusions with regards to the Old Gym, Old Science Building, Library Building and addition to the Chapel/Barham House in paragraphs 109 to 113 above and support the component of the concept plan seeking demolition of those buildings. The Commission approves the demolition of these buildings in the Concept Proposal.

Despite this, Urbis have reassessed the significance of the Old Gym Building and have included additional analysis of the building's fabric in Section 2.3.4 of the CMP. While the Old Gym Building was purpose built for the school in 1923 and designed by John Burcham Clamp, the extensive alterations and additions to the building over its almost 100 year history have severely degraded the integrity of the structure and has made the interpretation of the building difficult. As per the updated Gradings of Significance, provided below, it is considered the Old Gym Building still retains this Little grading.

Further information required to substantiate grading of little significance to the additions to the east [west] of Chapel Building.

The Part 1 CMP provides an overview of the history and development of the Chapel Building, Barham and Wilkinson House in the context of the development of the SCEGGS Darlington campus. Further detailed analysis of each of these buildings are included/are to be included in the individual CMPs for these buildings. Despite this, Urbis has reviewed the information provided within the Part 1 CMP relating to the Chapel Building to ensure that the Little grading of significance for the additions to the Chapel Building to the west are substantiated and that the further detailed analysis of this building will not result in a different conclusion in regards to the gradings of these additions.

The overall gradings of significance diagram provided in Section 6.6 of the Part 1 CMP has been updated to correct the mistake in the mapping of the overall built form of the Chapel Building as the diagram did not map the whole of the verandah on the north side of the Chapel Building, or the intact

portion of the Chapel Building at the west as being of High significance, which contains the main timber staircase for the building.

All fabric that is located to the west of the main staircase within the Chapel Building has undergone substantial change over time. The Chapel Building has undergone several major alterations and additions since its construction in 1901. This includes the east extension in 1909, which continued the same overall form and detailing as the original 1901 building. The hipped roof portions of the Chapel Building at the west were originally only two storeys in height. This portion of the building was modified several times from the 1920s onwards, first to link with Barham and then with the Old Gym Building. A third storey was added to the eastern portion of the building within the same decade. Further internal modifications were undertaken from the mid to late twentieth century due to the changes of use of the building which have degraded the overall integrity of this portion of the building over time. Further this portion of the building is generally of little architectural merit and little early fabric remains internally. Having regard for the above it is considered appropriate to retain the significance grading for this portion of the Chapel Building as being of little significance.

Policies relating to fabric of moderate significance to be revised, as current policies share similar approaches to fabric of Little, Neutral and Intrusive significance.

Please refer to comments in below section in relation to this matter.

Update list of architects to include architects responsible for alterations and additions to buildings.

The list of architects, as included in Section 3.9 of the Part 1 CMP has been updated to include, where known, the relevant architects and dates for additions to buildings that were not included previously. This includes the additions to Barham, Chapel Building and the Old Gym Building.

RESPONSE TO PART 1 CMP COMMENTS FROM COS, 18 AUGUST 2021

The following section provides responses to the specific comments issued by CoS in relation to the Part 1 CMP. These responses have been divided into discussions of gradings of significance and policies, as the main questions raised by CoS were in relation to these two matters.

Gradings of Significance

It should be noted that the gradings of significance as per the NSW Heritage Council Guidelines contained in the publication *Assessing Heritage Significance* (2001) are provided as a guide to assist in grading significant fabric and can be adjusted to suit the needs of the buildings and items being assessed (page 11). This is further noted in *The Sixth Edition Conservation Plan* by James Semple Kerr (2004, page 19) that notes:

While the statement of significance sets out in general terms the nature and level of significance of a place, the assessment of individual elements provides flexibility necessary for the management of future change. The hierarchy developed to present the level of significance should therefore be chosen to suit the place and must be explained with clarity.

It is acknowledged that the criteria for the gradings of significance used within both the Part 1 and Part 2 CMPs is somewhat vague in relation to those elements that are identified as being of Little Significance.

In order to rectify this, we have proposed amendments to the wording of the gradings of significance to clearly delineate the difference between the gradings. The updated gradings of significance are as outlined below.



Grading	Justification	Status
Exceptional	Rare or outstanding element directly contributing to the place's overall heritage significance; they retain a high degree of integrity and intactness.	Fulfils criteria for local and state listing.
High	Element has a high degree of original fabric and demonstrates a key element of the place's overall heritage significance.	Fulfils criteria for local and/or state listing.
Moderate	Element is altered or modified; has little heritage value but contributes to the overall significance of the item.	May fulfill criteria for local listing.
Little	Element may be difficult to interpret or may have been substantially modified.	Does not fulfill criteria for local or state listing.
Neutral	Elements do not add or detract from the site's overall heritage significance.	Does not fulfill criteria for local or state listing.
Intrusive	Elements are damaging to the place's overall heritage significance.	Does not fulfill criteria for local or state listing.

CoS provided comment on a number of elements within the Part 1 CMP in relation to the grading of buildings and elements. The below table provides the commentary provided by CoS along with Urbis' response. As a result of the feedback from CoS, some gradings have been revised. Refer to Sections 6.5 and 6.6 of the Part 1 CMP which incorporates these changes.

Council Comments			Urbis Comment
Whole Site CMP	Urbis 2021	Per Heritage Council Guidelines	
Old Gym Building by John Burcham Clamp	Little	Should be at least Moderate	As noted above, further analysis has been included in Section 2.3.4 of the CMP that highlights the extent of changes to the building and the loss of integrity. The grading of the Old Gym Building as Little is therefore justified and has been retained.



Council Comments			Urbis Comment
Whole Site CMP	Urbis 2021	Per Heritage Council Guidelines	
1920s addition to Barham by John Burcham Clamp	Little	Should be at least Moderate if not high	The additions to the east of Barham have undergone many changes since their erection in 1901. The existing eastern extension reflects various layers of change dating from 1901 to the late twentieth century. The 1920s works by John Burcham Clamp were limited to a small scale two storey addition located at the north-east of Barham to the south of the verandah. This addition is not considered to be of architectural merit and served a utilitarian purpose for the addition of a scullery and sick bay. The remainder of the east additions to Barham are of little heritage value to the overall site and are not of any particular architectural merit. The overall integrity of the additions is low due to the multiple modifications undertaken to them since the original 1901 extension was constructed. Given the significance of Barham itself, these east additions in comparison are of little heritage value and are not considered to significantly contribute to the overall value of Barham.
Wilkinson House by Emil Sodersten	High	Should be Exceptional for rarity values	It is acknowledged that the building has rarity values as an example of Sodersten's early works, but does not reflect an exceptional example of his body of work. It is illustrative of an architect at the beginning of their career before they had established his formative style, and as such does not warrant an exceptional grading. The gradings are also considered in the context of the overall site as a whole. Further discussion on this matter will be incorporated in response to the specific questions relating



Council Comments			Urbis Comment
Whole Site CMP	Urbis 2021	Per Heritage Council Guidelines	
			to the Wilkinson House CMP, to be provided at a later date.
Chapel building by John Burcham Clamp	High	Should be Exceptional for rarity values	<p>The Chapel Building was not originally designed by John Burcham Clamp. However, the chapel contained within the Chapel Building, added in 1926 was designed by Clamp, as well as some minor additions to the west during the same decade.</p> <p>We have reviewed the mention of the Chapel Building in terms of its rarity value within the context of the SCEGGS Darlington campus and we have retracted the statement that the building contributes to the sites rarity values as this is not considered to be substantiated in the document.</p> <p>Further detailed assessments of significance for Chapel Building will be undertaken as part of the Part 4 CMP that is to be prepared at a later date. Further assessment at this stage is not predicted to change this ranking.</p>
Old Gym Building			
Overall form	Little	Should be at least Moderate	See previous note on significance grading.
West Elevation	Little	Should be at least Moderate	Of the four main elevations of the Old Gym Building, the west, along with the north elevation have undergone the highest degree of change. The west elevation has had original service wings demolished and two of the four windows infilled with brick. The integrity of this elevation is low and



Council Comments			Urbis Comment
Whole Site CMP	Urbis 2021	Per Heritage Council Guidelines	
			hence it is considered appropriate to be ranked of little significance.
Original windows and doors	Little	Should be at least Moderate	The reference to original windows and doors in relation to the interior fabric has been removed and is now incorporated as part of the Exterior portion of the schedule. Original windows and doors that remain have been noted, as well as where windows and doors have been replaced and/or infilled. We have acknowledged that original windows and doors are of Moderate significance.
Original internal timber panelled doors	Little	Should be at least Moderate	A few original timber panelled doors remain off the hallway within the first floor of the Old Gym Building. As these doors remain intact, we have updated their significance to Moderate.
Remnant original skirting and architraves	Little	Should be at least Moderate	The remnant original skirting boards and architraves are sporadically located throughout the first floor of the Old Gym Building. As only sections of the skirting boards and architraves remain, it is considered that their overall integrity is diminished and hence the allotted little significance attributed remains. In addition, the remnant skirtings reflect typical interiors of the period and are not aesthetically distinctive.
Remnant original room layout	Little	Should be at least Moderate	Further analysis of the original room configuration has now been included in Section 2.3.4 of the CMP. The original room layout of the Old Gym Building has undergone substantial changes since its original erection in 1923. The remnant original room layout at the first floor is very difficult to interpret and hence has a little



Council Comments			Urbis Comment
Whole Site CMP	Urbis 2021	Per Heritage Council Guidelines	
			significance ranking attributed. It is noted that the gym layout and space is ranked as being of Moderate significance.

Policies

The document provided by CoS provided a list of policies grouped under two headings:

CMP Policies allowing change, damage, alteration, removal and demolition of high and exceptional significance fabric

and

CMP Policies treating moderate significance fabric the same as little and intrusive fabric

The policies that were noted by CoS under these two categories are provided in the table below with comments provided by Urbis.

Policy		Urbis comment
<i>CMP Policies allowing change, damage, alteration, removal and demolition of high and exceptional significance fabric</i>		
Policy 16	Unless otherwise stated in these policies, surviving original and early elements and fabric identified as having exceptional and high significance must be retained intact, and conserved.	This policy does not allow change, damage or alteration, apart from retention and conservation, except where permitted by other specific policies.
Policy 18	Where elements of exceptional and high significance have been damaged, they are to be repaired with sympathetic materials in preference to replacement. Significant elements should be repaired in-situ wherever possible.	This policy too provides guidance for the repair of elements of exceptional and high significance.
Policy 19	If changes to elements of exceptional and high significance are required, they should be carefully considered and the approach should be one of minimal intervention; as much as necessary, as little as possible.	This policy provides for the allowance of change, however, any change would need to be carefully considered and be of minimal intervention. This is a standard approach to fabric of significance. It does not allow change that would be detrimental to the significance of the item

Policy		Urbis comment
		and any change would be informed by the other policies within the CMP
Policy 21	Any elements of significance proposed for demolition, removal or alteration, should be subject to archival photographic recording, copies of which should be retained on site and provided to the relevant consent authorities. This should include photography and / or measured drawings as deemed necessary. Archival recordings should be undertaken in accordance with the former NSW OEH Heritage Division's Guidelines for ' <i>Photographic Recording of Heritage Items Using Film or Digital Capture</i> '.	This is a standard policy that applies to any changes proposed to the site. The policy does not specifically allow change, rather it requires that change is recorded.
Policy 26.	Any proposed new uses should be compatible with the identified heritage values and significance of the buildings, structures or space. Uses which require an unacceptable degree of intervention for upgrade to legislative compliance would not be acceptable.	This policy specifically notes that changes proposed to facilitate a change of use must not have a detrimental effect on the identified heritage values and significance of the place.
Policy 27.	Any future adaptation of the interiors of buildings of exceptional and high significance to suit new uses should aim to retain these spaces and fabric.	This policy encourages the retention of spaces and fabric of exceptional and high significance.
Policy 34	Any major works to elements of the campus of exceptional and high significance needs to be based on the results of further investigation.	This is a standard policy to ensure that any future works are guided by detailed analysis of fabric. This will also be addressed as part of the Parts 2, 3 and 4 CMPs which will/do provide further detailed analysis of fabric of Wilkinson House, Barham and Chapel Buildings.
Policy 38.	Buildings and elements of exceptional and high significance should be retained and conserved where possible. Modification may be permissible subject to heritage assessment and must be subject to a detailed archival recording.	This policy has been amended as follows: Policy 38. Buildings and elements of exceptional and high significance should be retained and conserved. Modification may be permissible provided that interventions are minimal, and any changes ensure the retention of the heritage values of the overall site and the

Policy		Urbis comment
		subject elements. Any changes must be subject to a detailed archival recording.
Policy 39	Substantial demolition or removal of building of high significance may in very rare circumstances be permissible subject to heritage assessment, and only if this change is required to facilitate the overall conservation and interpretation of the place in perpetuity. Any major change to these elements should be subject to a detailed options analysis to demonstrate that the proposed change or removal is necessary, and a reasonable and appropriate approach and further that the proposal has sought to mitigate heritage impacts.	<p>This policy has been amended as follows, and no longer makes any mention of demolition of elements identified as being of high significance.</p> <p>Policy 39. Substantial modifications to buildings of high significance may in very rare circumstances be permissible subject to heritage assessment, and only if this change is required to facilitate the overall conservation, interpretation and use of the place in perpetuity. Any major change to these elements should be subject to a detailed options analysis to demonstrate that the proposed change or removal is necessary, and a reasonable and appropriate approach has sought to mitigate heritage impacts. .</p>
Policy 40	Buildings and elements of moderate, little and neutral significance may be altered or removed as required	<p>This policy has been amended as follows, to remove moderate graded buildings from this statement:</p> <p>Policy 40. Buildings and elements of little and neutral significance may be altered or removed as required provided their removal does not degrade the heritage values of the campus or impact elements of exceptional or high significance.</p>
Policy 44	All major changes and any demolition of buildings or elements identified as, high, moderate or little significance in the CMP, and any works to buildings of exceptional significance must be subject to an archival recording. Copies of a photographic archival recording should be retained on site and issued to the relevant consent authorities. This should include photography and / or measured drawings as deemed necessary. Archival recordings should be undertaken in accordance with Heritage NSW's (former Heritage	This policy has been removed as the intent of this policy is already covered as part of Policy 21.

Policy		Urbis comment
	Division of Office and Environment and Heritage) Guidelines for 'Photographic Recording of Heritage Items Using Film or Digital Capture'. Archival Recording should form part of an archive of changes and development and contribute to the documentation of the school's history	
Policy 47	The approved Concept DA proposes development to the east of Barham in place of the existing additions. It is critical that detailed design of this building enables the eastern façade to be retained and interpreted. Barham must remain legible in the round. Lightweight additions/links are acceptable. Any new addition to Barham should be modulated to minimise impacts of scale and bulk. Any new addition should acknowledge and reinstate of oblique views to the north façade from Forbes Street.	This policy does not endorse changes to the elements of Barham that are of exceptional and high significance. This policy relates to the east additions of Barham which are graded as being of little significance.
<i>CMP Policies treating moderate significance fabric the same as little and intrusive fabric</i>		
Policy 20	Intervention for purposes other than conservation of the fabric is to occur in areas of lower (moderate, little and intrusive) rather than higher (high) significance	This policy has not been altered. As noted in Policy 12 change is allowed to elements of Moderate significance so long as it does not adversely affect values and fabric of exceptional of high significance. Fabric of moderate significance do contribute to the place's overall heritage significance, but do not represent a key aspect of significance of the place. It is noted that future change will be subject to assessment and is required to be justified via a Development Application and Heritage Impact Statement.
Policy 33	Intervention for purposes other than the conservation of building fabric should occur in areas of Moderate, Little, Neutral or Intrusive significance.	Again, this policy has not been changed, as per comments above.
Policy 55	The Old Gym building overall has little significance due to the substantial alterations and additions that have been undertaken since its original construction in 1923. If the building is required to be demolished,	Further information has been provided in the CMP outlining the extent of changes to the Old Gym building.

Policy		Urbis comment
	an archival recording should be undertaken prior to its demolition.	<p>The significance of the Old Gym, as previously discussed has remained as being of Little significance overall.</p> <p>As noted previously, approval has been granted by the IPC for the demolition of the Old Gym Building, along with a number of other buildings located on the campus.</p>
Policy 56	<p>The Old Science Building has moderate significance due to its architectural integrity and reflection of the development of SCEGGS during the late 1960s. However, if its demolition is proposed in order to ensure the ongoing use of the campus by SCEGGS, its demolition is acceptable, provided that an archival recording is undertaken prior to its demolition.</p>	<p>This policy is considered to be acceptable. The removal of the Old Science Building, while substantially intact and being of Moderate significance, is acceptable if it is required to ensure the ongoing use of the site by SCEGGS and having regard for the limitations of the site.</p>

CONCLUSION

We hope the above clarifications to CoS comments provide sufficient response to the comments raised in relation to the Part 1 CMP.

We welcome any further discussion on the Part 1 CMP following review by DPIE prior to finalisation and endorsement by the Planning Secretary.

Yours sincerely,



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