

06 December 2019

The Minister for Planning and Public Spaces
NSW Government, Department of Planning, Industry and Environment
320 Pitt Street
SYDNEY NSW 2000

Dear Sir,

**HERITAGE IMPACT STATEMENT
PROPOSED DESIGN MODIFICATIONS - EDUCATION BUILDING
35-39 BRIDGE STREET, SYDNEY
S4.55 APPLICATION TO MODIFY SSD7484**

INTRODUCTION

This concise Heritage Impact Statement has been prepared to assess the impact of the proposed design modifications to the approved proposal for the Department of Education Building (Education Building) located at 35-39 Bridge Street, Sydney. The proposed design modifications, the subject of the S4.55 Application to Modify SSD7484, are required because of:

- Architectural design development;
- Engineering advice;
- Ausgrid requirements; and
- Hotel brief development.

The S4.55 Application is being submitted following approval of State Significant Development (SSD) Stage 2 Application Number SSD 7484, for the adaptive reuse of the Lands Building, located at 23-33 Bridge Street, Sydney, and the Education Building, located at 35-39 Bridge Street, Sydney as hotel facility. Both buildings have been described as the "Sandstone Precinct".

We understand that this Heritage Impact Statement will be submitted to the Department of Planning and Environment. Overall, we consider that the proposed design modifications will have an acceptable heritage impact in the context of the major adaptive reuse works that have been approved.

METHODOLOGY AND STRUCTURE

This Heritage Impact Statement has been prepared in accordance with the guidelines outlined in the *Australia ICOMOS Charter for Places of Cultural Significance*, 2013, known as *The Burra Charter*, and

the New South Wales Heritage Office (now the Heritage Division of the NSW Office of Environment and Heritage) publication, *NSW Heritage Manual*.

The Burra Charter provides definitions for terms used in heritage conservation and proposes conservation processes and principles for the conservation of an item. The terminology used, particularly the words place, cultural significance, fabric, and conservation, is as defined in Article 1 of *The Burra Charter*. The *NSW Heritage Manual* explains and promotes the standardisation of heritage investigation, assessment and management practices in NSW.

SITE IDENTIFICATION

The Education Building (35-39 Bridge Street, Sydney) is located on the south side of Bridge Street and occupies a whole block bounded by Young Street to the east, Loftus Street to the west, and Farrer Place to the south. It is described by NSW Land and Property Information as Lot 56, DP 729620.

HERITAGE MANAGEMENT FRAMEWORK

The statutory heritage management framework of the Education Building is as follows:

- Listed on the NSW State Heritage Register under the NSW Heritage Act 1977 (SHR No. 00726)
- Listed in Schedule 5 of the Sydney Local Environmental Plan 2012 (Item I684) as a State heritage item - Department of Education building including interior.
- Partially included (northern portion) in the Bridge Street/Macquarie Place/Bulletin Place Special Character Area identified in the Sydney Development Control Plan 2012.
- Partially included (southern portion) in the Farrer Place Special Character Area identified in the Sydney Development Control Plan 2012.

REPORT LIMITATIONS

Archaeological assessment of the subject site is outside the scope of this report.

This report only addresses the relevant heritage planning provisions and does not address general planning or environmental management considerations.

This report should be read in conjunction with the Education Building Conservation Management Plans (CMP) prepared by GBA Heritage dated May 2017 and endorsed by the NSW Heritage Council in June 2017.

ESTABLISHED SIGNIFICANCE OF THE SUBJECT SITE

The following Statement of Significance for the Education Building, located at 35-39 Bridge Street, Sydney is drawn from the updated and endorsed CMP for the Education Building prepared by GBA Heritage in 2017, which in turn was drawn from the 2015 CMP:

Statement of Significance:

The Department of Education building has been synonymous with the provision of universal public education in New South Wales since its construction in 1915 and is still used for its original purpose. [As part of the approved lease and adaptive reuse of the building, this association is to imminently cease]. The Department's association with the site dates from its establishment under the Public Instruction Act 1880. The southern half of the building, the former Department of Agriculture offices, demonstrates that Department's importance in the development of scientific agriculture and support for primary production when this was a major industry in the state in the first half of the 20th century.

The architectural style of the building, a restrained form of Federation Free Classical with plain facades highlighted by ornamentation at the entrances and upper floor entablature, is representative of contemporary tastes demonstrating external materiality and scale of the building in its original design by George McRae with Stage 2 (for the Department of Agriculture) being completed by a private firm, John Reid & Son.

The Department of Education building is a fine example of early 20th century government offices combining elements of their historic 19th century predecessors, with a concern for contemporary office design. Built in two stages 1912-15 and 1929-30, the building demonstrates rapidly changing methods in building construction of the early 20th century. The 1994-95 refurbishment by noted architect Ken Woolley provided a rational and elegant solution to the historic problems posed by key planning differences between the two stages of construction and resulted in efficient circulation and improved accommodation to contemporary standards.

Although the second stage of the building (1915 and 1930) was designed by a different architect using a different, more technologically advanced form of construction, the external architectural presentation of the two stages is remarkably unified or consistent. Occupying the of the city block bounded by Bridge Street, Loftus Street, Young Street and Farrer Place, the building is a key element in the built landscape of Bridge Street, in the surrounds of Macquarie Place and in Farrer Place to all of which it makes a notable contribution. It is part of an important group of late 19th and early 20th century government offices that represent the continuing association of this area with government and administrative activities since 1788. The site is part of a street plan that reflects the earliest development of the city of Sydney.

The Department's Art Gallery is unique in government offices and its student art collection, William Wilkins Memorial Art Collection, is the oldest in Australia.

The building is associated with key personalities in the history of education in New South Wales including Peter Board and Sir Harold Wyndham. It is also associated with Government Architect George McRae, who is considered as a key practitioner of the Federation Romanesque, Anglo-Dutch and Free Style in Sydney and whose work played a dominant role in the evolution and spread of Federation architecture throughout Australia.

The building has been the symbolic headquarters for generations of teachers and administration staff who have worked in the NSW education system since 1915.

The heritage significance of the Education Building is enhanced by the collection of movable heritage including furniture and war memorials. The movable heritage of the building has an ongoing and continuous association with the government function and demonstrates the building's association with public service. The collections of furniture and fixtures associated with public service and government

administration demonstrate superior quality in local design, manufacturing and materials. The war memorials are of particular social significance for its commemoration of the role of Department of Education employees in war.

The site also has high potential for surviving archaeological remains of State significance including the site of the Judge-Advocate's residence, and gardens, boundaries and setting for the residences of the Judge-Advocate and the Colonial Secretary. These remains may survive below the Loftus Street vehicular entry and the northwest corner of the site.

THE PROPOSAL

- The proposed modifications, the subject of the S4.55 Application to Modify SSD7484, are required because of:
- Architectural design development;
- Engineering advice;
- Ausgrid requirements; and
- Hotel brief development.

The modified works have been designed by Make in association with Webber and have been developed with Urbis' heritage input to minimise adverse heritage impacts while adapting the building into a high quality, functional hotel facility. The following modifications are proposed:

Basement 02- 03

- The basements have been slightly reconfigured.

Lower Ground Level

- The south west external tenancy has been replaced with a substation. Ausgrid require the development's substation to be located within the Education Building.
- The external tenancy has been relocated to the north east corner.
- The north west corner of the building will now accommodate guest rooms.
- Changes to the Loftus Street laneway to accommodate DDA access

Ground Level

- Minor amendments to the interior layout.
- Deletion of Sesame Stair.
- Installation of additional columns in the northern ministerial Suite

Level 01-04

- Amendments to the interior layout including deletion of keys and some re-configuration.

- Changes to the internal courtyard façade treatment.

Level 05

- Amendments to the interior layout including construction of essential structure to the south wall of the gym to provide lateral stability.

Level 06-09

- External colour of blinds to be amended to a darker recessive tone.
- Amendments to the interior layout including additional keys.
- Minor changes to the new roofscape including changes to the cooling towers to accommodate additional loading requirements from the Lands Building.

ASSESSMENT OF HERITAGE IMPACT

Overall the modifications are considered to have a relatively minor impact and are considered acceptable in the context of the major adaptive reuse works.

The modest reconfiguration of the basements will have no heritage impact.

The interior, courtyard façade and cooling tower modifications are largely limited to the reconfiguration of new work that will generally have a neutral heritage impact.

Relocation of the external tenancy will have a neutral heritage impact but will also deliver some significant circulation and access benefits because the new location has the advantage of an existing entrance door on the Young Street façade.

The modifications to the approved proposal are largely limited to impacts on fabric of Moderate significance. The endorsed CMP for the Education Building prepared by GBA Heritage in May 2017 identifies the following policy for fabric of Moderate significance:

Policy 6.9.5 ELEMENTS OF MODERATE SIGNIFICANCE

- In areas of Moderate significance, aim to retain all significant fabric as a first conservation option.
- Any work which affects fabric, spaces or relationships with a Moderate assessed heritage value should be generally confined to preservation, restoration, reconstruction or adaptation as defined in the Burra Charter.
- If adaptation is necessary, minimise extent of change and impact on significance. Some adaptation of elements may be acceptable.
- Work involving the alteration, reduction (or even the removal) of a particular element may be an acceptable option where it is necessary for the effective reuse and proper function of the place and does not reduce the overall significance of the place.
- Undertake all new work in accordance with the policies in this Conservation Management Plan.

The deletion of the Sesame Stair in the Farrar Place entrance, in response to the developed access strategy, will have a positive heritage impact. The marble clad entrance stairs will no longer need to be adapted.

Some Exceptionally significant fabric is adversely affected to accommodate the substation required by Ausgrid. Numerous options have been explored and the current proposal considered to have the least heritage impact while delivering Ausgrid's requirements. Impacts on sandstone façade fabric, where an existing window needs to be extended to provide a substation equipment door, has been minimised and the new reveals will be appropriately detailed. The other doors and vents have been designed to be as sympathetic as possible while addressing Ausgrid's requirements. The DRP agree that this is a suitable outcome.

Construction of essential structure to the south wall of the gym is required on Level 5 to provide lateral stability. The existing cornice has had moulds taken and has been recorded to allow for reconstruction of the concrete cornice once the new wall is constructed. This is likely to have only a negligible impact on the presentation of this large room. This structure and the proposed raising of the floor in this zone will have an impact on the adjacent original timber door, sidelights and highlights. To mitigate this impact, we have advised that the affected original timber door is relocated several metres to the north and have its highlight altered to become the main entrance to the gym area. This is a potentially positive heritage impact as, until now, this door was going to lead into a back of house storage area. This door will now be celebrated in a similar manner to the historic door to the pool area. The DRP agree that this is a suitable outcome.

Additional columns are required in the northern Ground Level Ministerial Suite. The additional columns have been designed to ensure we won't have to strengthen the decorative pilasters in the Board Room and have been located in the thickness of existing walls in surrounding rooms of less sensitivity, thereby also eliminating the previously approved requirement to strengthen the marble clad columns in the Bridge Street foyer below.

The endorsed CMP for the Education Building prepared by GBA Heritage in May 2017 identifies the following policy for fabric of Exceptional significance:

Policy 6.9.3 ELEMENTS OF EXCEPTIONAL SIGNIFICANCE

- In areas of Exceptional significance, aim to retain all significant fabric as a first conservation option.
- Any work which affects fabric, spaces or relationships with an Exceptional assessed heritage value should be generally confined to preservation, restoration, or reconstruction.
- Work involving the alteration or reduction of a particular element may be an acceptable option where it is necessary for the effective reuse and proper function of the place and does not reduce the overall significance of the place.
- Give preference to changes that are reversible.
- Undertake all new work in accordance with the policies in this Conservation Management Plan.
- Prior to any change, full archival recording is essential.

The proposed work to the historic facades to accommodate the Ausgrid substation and the Level 5 gym has already been archivally recorded in accordance with this policy.

The modified substation proposal is also in accordance with the following policies identified in the endorsed CMP for the Education Building:

Policy 6.10.4

Any interventions for essential services compliance or operational requirements such as fire egress, Fire Brigade requirements, Ausgrid requirements, DDA or BCA compliance etc. should be carefully managed with the input of a conservation architect or heritage consultant. Dispensation options must be explored prior to any intervention.

Overall the modifications will have an acceptable material impact on the historic fabric of the building in the context of the approved major adaptive reuse works.

CONCLUSIONS

The design modifications will have an acceptable material impact on the historic fabric of the building in the context of the major adaptive reuse works. The proposed modifications, the subject of the S4.55 Application to Modify SSD7484, are required because:

- Architectural design development;
- Engineering advice;
- Ausgrid requirements; and
- Hotel brief development.

The modifications have been developed with Urbis' heritage input to minimise adverse heritage impacts while responding to engineering advice and utility requirements and providing reasonable amenity as the building is converted to hotel use.

The modified proposal is in accordance with the intent of the endorsed CMP prepared by GBA Heritage. The proposal is also considered to be in accordance with the relevant heritage requirements of the *Sydney Local Environmental Plan 2012* and the guidelines of the *Sydney Development Control Plan 2012*.

Overall the proposal is considered to have an acceptable heritage impact on the significance of the Education Building in the context of the major adaptive reuse work.



RECOMMENDATION

The proposed modifications will have an acceptable impact in the context of the major adaptive reuse works approved by SSD7484 to adapt the building to hotel use. On this basis we recommend that the Department should have no hesitation, on heritage grounds, and approve the S4.55 Application to Modify SSD7484.

We recommend that the sandstone façade fabric, required to be removed to provide access to the substation equipment, is salvaged.

Should additional information be required, please do not hesitate to contact the undersigned.

Yours sincerely,

A handwritten signature in black ink, appearing to be "Jonathan Bryant", written in a cursive style.

Jonathan Bryant
Director Heritage