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13 January 2023

Matthew Spooner
Project Director
RP Infrastructure

By email: Matthew.Spooner@rpinfrastructure.com.au

Dear Mr Spooner,

Re: Fort Street Public School: SSD 10340, Section 4.55 Modification 2

The National Trust has reviewed the documents associated with the above and are naturally disappointed that yet another change, involving an increase in height, has been proposed for the Fort Street Public School project which is currently under construction on Observatory Hill.

The Trust has had a continuing interest in this design. While we are more than aware that certain elements of any construction project can only be resolved during construction and that unforeseen circumstances always arise when dealing with historic buildings, it is unclear how issues arising from a *new* building on this site were not previously understood and correctly documented.

The changes proposed may indeed be considered minor in some respects, and are certainly less than the first modification which was refused, however the issue here must be to ask why this change is necessary at all?

We note in the Modification Report by Ethos Urban (November 2022, p.5) that *"The proposal has been presented to the State Design Review Panel and received its support"* and so it is unclear how much impact this exhibition period will actually have on the outcome. Nonetheless, we make the following comments and raise the following questions:

The need for a compliant design

The Modification Report (p.6) states *"the proposed modifications are the result of emergent factors during construction that require necessary modifications to achieve a compliant design that meets the functional and equitable needs of the school."*

Does this mean that the design as previously submitted, placed on public exhibition, and currently under construction, is non-compliant and does not meet the functional needs of the school? The fact that a further series of design changes and consultant reports have again needed to be produced is not strictly a heritage matter of course, but it does once again raise serious concerns about the way this project has been designed and managed in one of the most heritage-sensitive sites in Sydney.

When working with a heritage building, the MET Building in this case, it is of course logical to understand the floor levels of the original building as a starting point when designing new structures (including a lift) that will interact with it. This should have been the very first step in any design, but this appears not to have been the case.

The Modification Report (p.6) claims that "*If the internal floor level amendments to Buildings F G, H and J were not proposed, then those buildings' relationship with existing heritage fabric especially the MET Building, and surrounding finished ground levels would remain suboptimal. Moreover, the opportunity would be lost to reduce soil fill in some instances to reduce the risk of exposing the site to potential contamination risks from off-site backfill materials. "*

This raises a number of concerns. Was there previously a contamination risk from proposed backfill? Did the previous design not consider the existing floor levels of the MET building? Were the existing ground levels not properly understood? How could a project of over $50m in value not consider such matters?

The Lift and Stairs

The National Trust has continually raised the issues of overall building height, and how the access to the MET rooftop can be achieved in terms of fire compliance. This design has now been evolving for a number of years and naturally it is disappointing that at this late stage (when the building is actually under construction!) the design has still not been resolved.

The heritage impacts of this project are well defined and of course one of the most important has been the sensitivity regarding overall building height to ensure that the former Bureau of Meteorology Building remain the most dominant. The other has been to protect archaeology.

The Modification Report (p.13) notes, when considering heritage impact, that *"the minor height increase to the Stair 4 lobby driven by the introduction of spandrels is supported by Curio from a heritage perspective as it is an essential design change to achieve fire safety compliance."* Again, did the original stair design not in fact meet the necessary fire compliance standards? If not, why was it placed on exhibition, approved, and construction commenced?

The installation of a lift has similarly been one of the major considerations in terms of access and compliance, and presumably has been subject to much design and engineering consideration. To alter this proposal at this stage to increase the building height by 610mm (not an insignificant amount) is extraordinary.

On 7 October 2020, the plans for this project were approved. The stamped plans show a new lift in Building M, and the footings of Building J specifically designed to avoid significant archaeology:

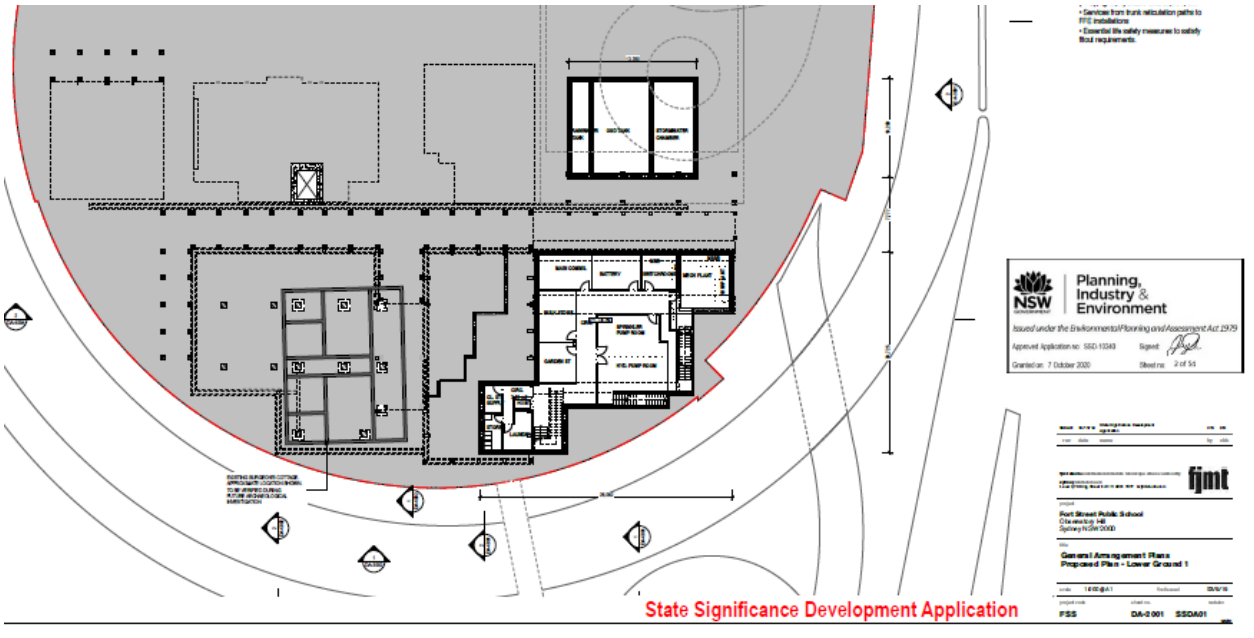

Figure 1: Lift location in Building M, as per approved Design stamped 7 October 2020.

The Modification 1 design involved taking the lift out of Building M, and instead locating it within Building J. One of the main reasons given for this was to reduce the heritage impact on Building M. The lift shaft was also carefully positioned so as to avoid archaeological impact:

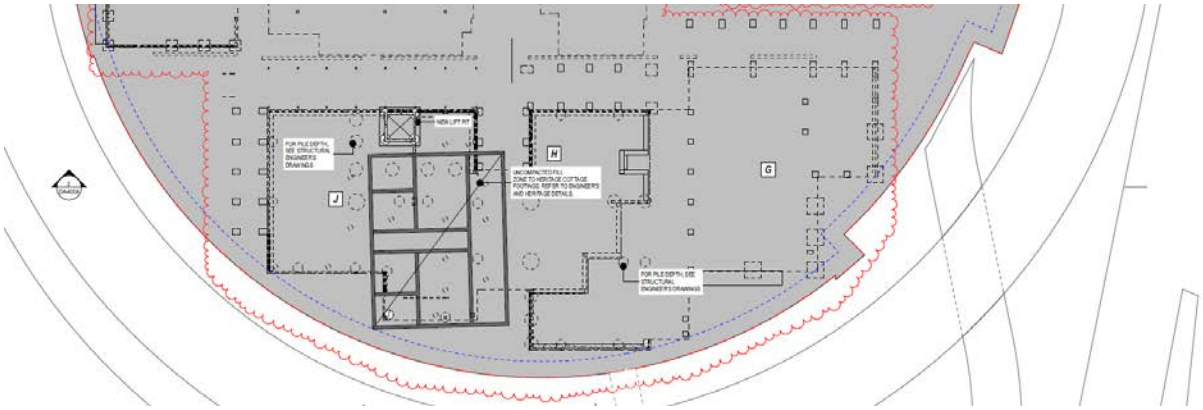

Figure 2: Lift location in previous modification – now moved to be within Building J.

Modification 1 was submitted as an SSDA Modification, placed before the State Design Review Panel for interrogation, and subject to much (negative) community feedback. The final approved design was then substantially revised based on this feedback, with a key change being that the new lift location would have less heritage impact, particularly on Building M. There is nothing in the documentation associated with this Modification to show why this lift, as originally proposed, could not be executed as designed.

Conclusion

As per our initial feedback to this proposed modification following a consultation session on 14 October 2022, the Trust would once again ask:

- How can it be claimed that the floor levels of Building M have only been "discovered" in recent times following remediation, when they have all been clearly shown on public documentation dating back as far as 2019? When integrating a new design with a historic building this is the starting point for any new work.
- How can it possibly be the case that a design that was not achievable was placed on public exhibition?
- How can all of the original consultants who developed the original lift, structural, architectural, and mechanical concepts be wrong?
- How can a *lowering* of the floor levels of Buildings G, H, J and F by between 172mm and 260mm result in the *raising* of the overall building height by 610mm?
- How can a claim be made that the lift shaft cannot be lowered due to impacts on archaeology when it has previously (Mod 1) been specifically located to avoid such conflicts, and its position remains unchanged?

Building height has always been and will remain the major issue on this sensitive sight. I would strongly urge all involved to review this design once again to ensure that there is no significant increase in height. The design that was exhibited previously must have been buildable and compliant.

Yours sincerely,

David Burdon
Director, Conservation