



Ms Karen Harragon
Director, Social and Other Infrastructure Assessments
Department of Planning & Environment
Level 22, 320 Pitt Street
SYDNEY NSW 2000

By email: andrew.beattie@planning.nsw.gov.au

Dear Ms Harragon

Response to Submissions report - SSD 7610 New Inner Sydney High School at 242A and 244 Cleveland Street, Surry Hills

Thank you for your email of 10 October 2017 inviting comment on the Response to Submissions Reports prepared on behalf of the Department of Education, for submissions received during exhibition of the Environmental Impact Statement for SSD 7610 for the Inner Sydney High School, 242A and 244 Cleveland Street, Surry Hills.

The following table sets out the comments made on behalf of the Heritage Council of NSW on 18 August 2017 for the then proposal and includes comments on amended proposal as well as the relevant Response to Submissions reports listed below:

- Urbis. Response to Submissions Report. 9 October 2017;
- Weir Phillips Heritage. Response to Submissions letter. 22 September 2017;
- Francis-Jones Morehen Thorp. Response to Submissions - Architecture. 4 October 2017.

Heritage Council submission 18 August 2017 commenting on the environmental impact statement.	Heritage Council comments on the Response to Submissions reports and amended design.
<i>Proposed tower's height and design are considered to be over-dominant, i.e. intrusive on the school site's scale and setting and also on the adjacent Prince Alfred Park. The tower as proposed will have major adverse visual impact on both, as seen primarily from Chalmers Street and from the Park to the west and north-west.</i>	<p>Despite the amendments to the design, to remove the tower's twist, remove one floor and simplify the composition, the tower's height and design are still over-dominant, and visually intrusive. The amendments are not sufficient to reduce the adverse impact on the setting and view to the significant buildings of the Former Cleveland Street Public School.</p> <p>The proposed tower is over-dominant and visually intrusive because its composition is over scaled and overly complex for this site. The tower comprises strong over scaled elements, stacked glazed boxes on pilotis, a glazed vertical shaft and a random battened glazed box. The tower's large-scale elements are almost indifferent to the existing historic buildings' smaller scale and picturesque composition. The arrangement is too busy and the large scale will upstage the visual prominence of the historic</p>

school buildings seen from the street, the park and in the round.

The tower's composition and its variety of materials should be simplified much further, so it does not upstage the historic buildings. The tower's level of simplicity should be guided by the success in the simplicity of Charles Perkins Centre at the University of Sydney also by FJMT which is placed alongside, but has not upstaged the sandstone clad St John's College, its historic neighbour. Refer Figure 1 below.



Figure 1 Source: Francis-Jones Morehen Thorp.

Also, the simplicity of the exterior of the new building's studio floors is successful. In contrast to the tower's busyness, the studio floors, with their precast cladding, are more uniform, simpler and quieter, but no less contemporary. The studios are a more respectful backdrop to the historic school buildings, Figure 2, with visual variety worked into the smaller details not into the large-scale composition.



Figure 2. Part of Diagram 2b, Francis-Jones Morehen Thorp. Response to Submissions - Architecture. 4 October 2017.

City of Sydney's 15 August 2017 comments for the environmental impact statement, that the variations in the tower's in external finishes may help to break up the scale, but they create complexity in appearance and possible visual clutter is supported.

<p><i>Proposed removal of trees in the main courtyard appears inconsistent with conservation policy 25, Existing Mature Trees.</i></p> <ul style="list-style-type: none"> • <i>Two Moreton Bay fig trees (south west courtyard);</i> • <i>Three London plane trees (main courtyard); and</i> • <i>Moreton bay fig tree and Queensland Kauri pine tree (north west courtyard).</i> 	<p>The amended proposal meets the intention of the EIA comment. The trees identified as being of historic significance in the CMP 2016, Tree 1 (Queensland Kauri), Tree 17 (Morten Bay Fig) and Tree 18 (Morten Bay Fig) will be retained and protected.</p>
<p><i>Proposed raised new north-east courtyard at street level above the north-east courtyard, 're-interpreting' this at street level- and constructing several small rooms below appears inconsistent with conservation policy 21 – Courtyard Setting to Existing Buildings which states 'no new development' in this courtyard.</i></p>	<p>The amendments to the proposal have reduced the impact and meet the intention of the EIA comment.</p>

The delegated Heritage Council submission dated 18 August 2017 requested that the Archaeological Assessment by Casey and Lowe Pty Ltd (July 2016) include more information. However, the July 2016 Archaeological Assessment does not appear to have been updated. Therefore, the July 2016 assessment should be revised in light of previous comments, re-stated below, before it is suitable to inform the assessment of the proposal and guide any work on site, if the proposal is approved:

- The assessment should address whether extra historical research is warranted for this site, additional to the research outlined in the Perumal Murphy Alessi Heritage Consultants Heritage Assessment;
- The assessment should include a comparative analysis, consideration of the site against the relevant NSW Historical Themes and how the themes might be reflected in the archaeological record at this site;
- The research framework proposed in the Archaeological Assessment Section 7 needs to consider relevant comparative information and the NSW Historical Themes in forming questions to be addressed during archaeological works;
- The Archaeological Assessment needs to provide more information to support the argument for limited research potential;
- In the archaeological assessment's proposed mitigation strategy, clearly describe when and why an archaeologist is required for monitoring and/or the discovery of unexpected finds;
- The management strategy should be guided by what is likely to be found and where impacts will occur. Some of the anticipated impacts are likely to be refined or expanded in detailed design.

The following consent conditions were recommended in the 18 August 2017 submission. The conditions are re-stated below and should be appended to any approval of the proposal:

Historic Heritage

- 1. A heritage consultant must be involved in detailed design and construction phases, consistent with conservation policies 11 and 12 of the 2016 Conservation Management Plan.**
- 2. The 2016 Conservation Management Plan should continue to guide the detailed design phase.**
- 3. An archival recording of the site, with particular focus on areas of proposed works, must be undertaken prior to commencement of works. This recording is to be carried out in accordance with current, published NSW Heritage Division guidelines and Policy 9 of the**

2016 Conservation Management Plan. Copies of the recording shall be provided to the Heritage Council of NSW and to the Council of the City of Sydney.

4. A record of proposed works should be maintained consistent with conservation policy 8 of the 2016 Conservation Management Plan.
5. All significant or original fabric identified by the 2016 Conservation Management Plan to be removed during proposed works (most notably doors and windows) should be stored on site for possible reinstatement at a future date or used in repairs where appropriate.
6. Where storage or future reinstatement is not possible, they should be offered to a reputable storage yard.
7. A Schedule of Conservation Works should be prepared and its recommendations implemented.
8. An Interpretation Strategy should be prepared and its recommendations implemented. This plan should include opportunities to reinstate, use and display moveable heritage items and should enable public access to interpretive elements on the site when opportunity arises, for example on heritage open days.
9. Noting that the HIS's scope omits demolition of Building 4, the covered walkways between this building and Buildings 1, 2 and 3 and the removal of existing landscape elements and selected trees, the Heritage Council of NSW would welcome the opportunity to comment on an HIS covering these works, given these are parts of the same heritage item, although subject to separate approvals.
10. The recommendations made by the Arborist regarding tree no's 1, 17-25 should be included as conditions of consent to ensure adequate protection of significant trees prior to, during and after completion of works.
11. The area of proposed paving over the root zones of both tree 1, Moreton Bay fig (*Ficus macrophylla*) in the site's south-west and the area of proposed 'suspended slab' paving around tree 17, Queensland kauri tree (*Agathis robusta*) near Building 3 should be reduced to ensure the non-compaction of the root zones of these significant trees, to the satisfaction of a qualified and experienced arborist.
12. The 2016 Conservation Management Plan summary statement of significance should be revised to include the reference to 'local' and 'potential state' heritage values of significance within the site, to guide the appropriate management of the site's identified heritage values.
13. A State Heritage Register nomination to the Heritage Council of NSW should be prepared and submitted for the site, given that the 2016 Conservation Management Plan identifies that the site potentially meets several of the criteria for listing on the State Heritage Register.
14. Better justification for departures from the 2016 Conservation Management Plan's recommendations (e.g. conservation policy 25 – mature trees, and policy 21 – no new development in the north-east courtyard) regarding all significant layout, built and landscape elements should be provided in a revised Statement of Heritage Impact.

Historic Archaeology

15. An Excavation Director shall be nominated to direct the archaeological program for this project. The consultant shall have appropriate qualifications and experience commensurate with the scope of the Major Project works. This person shall demonstrate a response to the Heritage Council of NSW's Excavation Director Assessment Criteria for the significance and archaeological activity for approval of the Department of Planning and Environment prior to commencement of works. The nominated Excavation Director shall revise the assessment of significance supporting the archaeological assessment to include comparative analysis and against the NSW Historical Themes to guide the research questions relevant to support archaeological investigation of this site.
16. All construction contractors, subcontractors and personnel are to be inducted and informed by the Department of Planning and Environment Approved Excavation Director prior to commencing work on site as to their obligations and requirements in relation to historical archaeological sites and 'relics'.
17. All affected historical archaeological 'relics' and/or deposits of Local heritage significance are to be subject to professional archaeological excavation and/or recording before construction works commence which would impact those 'relics'. A Research

Design including an Archaeological Excavation Methodology must be prepared in accordance with Heritage Council guidelines by the Department of Planning and Environment Approved Excavation Director. Those documents should be prepared for the approval of the Secretary, Department of Planning & Environment upon receipt of advice from the Heritage Division of the Office of Environment & Heritage prior to works commencing on site.

18. After any archaeological works have been undertaken, a copy of the final excavation report(s) shall be prepared and lodged with the Heritage Council of NSW, the City of Sydney and the Department of Planning & Environment. The proponent shall also be required to nominate a repository for the relics salvaged from any historical archaeological excavations.
19. The information within the final excavation report shall be required to include the following:
 - i. An executive summary of the archaeological programme;
 - ii. Due credit to the client paying for the excavation, on the title page;
 - iii. An accurate site location and site plan (with scale and north arrow);
 - iv. Historical research, references, and bibliography;
 - v. Detailed information on the excavation including the aim, the context for the excavation, procedures, treatment of artefacts (cleaning, conserving, sorting, cataloguing, labelling, scale photographs and/or drawings, location of repository) and analysis of the information retrieved;
 - vi. Nominated repository for the items;
 - vii. Detailed response to research questions (at minimum those stated in the Department of Planning & Environment approved Research Design);
 - viii. Conclusions from the archaeological programme. This information must include a reassessment of the site's heritage significance, statement(s) on how archaeological investigations at this site have contributed to the community's understanding of the Site and other Comparative Site Types and recommendations for the future management of the site;
 - ix. Details of how this information about the excavations have been publicly disseminated (for example, include copies of press releases, public brochures and information signs produced to explain the archaeological significance of the sites).
20. The results of the archaeological fieldwork and the history of the site should be used to inform an Interpretation Plan for the site. This should be used to guide the future incorporation of the findings from the works in communicating the significance of the site to future students and visitors. The Interpretation Plan should be prepared in accordance with the Guidelines issued by the Heritage Council of NSW. The Interpretation Plan should be prepared for the approval of the Department of Planning & Environment.

If you have any questions regarding the above matter, please contact Ed Beebe, Senior Heritage Assessment Officer, at the Heritage Division, Office of Environment and Heritage on telephone 02 9585 6045 or by email at ed.beebe@environment.nsw.gov.au.

Yours sincerely



Rochelle Johnston
Manager, Conservation
Heritage Division
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As Delegate of the Heritage Council of NSW

14 November 2017