P R O J E C T S



Fort Street Public School RtS — Heritage

23 June 2020





Fort Street Public School RtS—Heritage (Curio Projects)

1.1.1. Heritage NSW

ITEM NO.	ISSUE	CURIO RESPONSE
60	Site Impacts The Heritage Council notes the prominence of the site, its physical and spatial constraints and the major alterations and additions to the 'exceptionally' significant 1941 Fort Street Public School building and southern part of the school. Accordingly, the Heritage Council supports opportunities to further explore a reduction in the density of the proposed development and cumulative impacts to the cultural significance and legibility of the heritage precinct. The Heritage Council understands that a single	Noted.
	construction phase would contain and minimise disruption.	
64	Conservation Management Plan	The comments by NSW Heritage in relation to the CMP are noted. All comments can be addressed and incorporated in the draft CMP which will be finalised upon completion of the project. A condition of consent should be prepared that requires the CMP to be finalised in consultation with NSW Heritage within twelve months of the issuance of the final occupation certificate for the site. The following responses relate to individual NSW Heritage comments below.



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	The Heritage Council notes that the 2020 CMP no longer includes a diagrammatic guideline for future development on the FSPS site (Figure 154 in the 2016 CMP). They recommend that Policy 25 (Design & construction of new buildings) in the 2020 CMP include more detailed justification and guidelines for where redevelopment could occur and the form, massing and height of new structures, to guide future development.	The diagrammatic guideline for future development was deleted from the draft CMP as a result of the detailed design process that was undertaken in consultation with key stakeholders, including NSW Heritage. The lengthy and detailed stakeholder consultation included a reassessment of the appropriate locations for onsite massing, which differed greatly from that shown in Figure 154 of the draft CMP. Given the level of input from the Heritage Division, key community groups, City of Sydney and other key stakeholders, it is considered that the current proposed massing represents the optimal balance between future school needs and heritage outcomes. Following approval of the SSDA and completion of the project, it would then be appropriate for the project architects/nominated heritage specialists to prepare final diagrammatic guidelines and policies to guide any additional future development at the site. The model prepared by FJMT for the site as part of the current project provides an example of the type of appropriate final modelling that could be included in the finalised CMP.



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		Example Diagramatic Modelling (Source: FJMT)
	The Heritage Council recommends a condition of consent to require further Heritage Impact Assessment of the proposed works to the MET Building once its physical and structural condition is known and that	Noted and Agreed.



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	Heritage NSW be consulted then, to reflect CMP Policy 22.11.	
	Whilst the CMP concludes that Cahill Cut is not considered to contribute to the significance of the actual FSPS Site, the Heritage Council recommends that the significance of Cahill Cut be assessed in its own right to adequately assess reciprocal, mutual and cumulative impacts from the development of the FSPS on its significant heritage value.	Can be reflected in additional discussion within the significance section of the CMP for the final CMP.
	The Heritage Council also considers the Heritage Impact Statement to be inadequate in its assessment of heritage impact of the proposed changes to Rembert's school building (including the new roof and photovoltaics).	Noted In response, Curio considers that the proposed heritage impacts associated with the internal and external changes to the building provide the best on balance outcome between achieving conservation of the key attributes of Rembert's School building, whist still allowing the building to be adapted so that it can, most importantly, be continued to meet the current and future requirements for use as a school.
		Whilst the intervention has been minimised as much as possible and has been designed to allow the removal of fabric to be easily read, and new verses old fabric also able to be easily read, in accordance with best practice Burra Charter principles and NSW Heritage guidelines, there are some unavoidable physical and visual impacts that are required, as part of ensuring that the building can continue to be utilised for its original intended and significant educational and schooling purposes.



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		In particular, it is considered that the value of Rembert's School Building lies not just in the conservation of it's key form and fabric (which is proposed as part of this redevelopment), where possible, but also in its intangible value associated with its continued, long-term use as a school. Less intervention would result in the inability to use the school for educational and teaching purposes, which would then result in a loss of the key intangible values associated with the existing building. In terms of the specific design impacts of the new roof and photovoltaics, it is considered that it would be appropriate to condition the consent to require further detailed design to be prepared in consultation with NSW Heritage prior to construction and installation of the new roof and photovoltaics
66	<u>Recommended Conditions of Consent</u> Heritage NSW concurs generally with the findings made by Curio Projects.	Noted.
	If SSD 10340 were to be approved, Heritage NSW recommends conditions of consent to: establish a steering committee; develop a precinct-wide strategic	All recommended conditions are noted and considered acceptable, with the exception of the proposed peer review.
	framework; ongoing Heritage NSW/Heritage Council consultation in design development; further assess proposed works to the MET Building; organise a peer review of the CMP; nominate a suitably qualified and experienced heritage consultant for the project; ensure archival recording is carried out in accordance with archiving guidelines; develop a Heritage Interpretation	A peer review of CMP is not considered necessary unless SSI are were seeking official endorsement of the CMP from NSW Heritage, at which point, NSW Heritage undertake the peer review of the CMP as part of the endorsement process. It is considered unnecessary to add an additional layering of CMP peer review prior to this.



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NO.		
	Strategy; prepare an Unexpected Heritage Finds	
	procedure; carry out archaeological investigation and	
	mitigation in accordance with Section 6 of the ACHAR,	
	provide Non-Aboriginal heritage induction training to	
	contractors; and manage the investigation and	
	documentation of historical archaeology.	

1.1.2. Public Submissions (Graeme King)

ITEM NO.	ISSUE	CURIO RESPONSE
138	Comment from Planner/Heritage Consultant – The current	The site has a complex and multi-layered heritage significance and values, which require to be addressed not just as individual items, but also as a whole site, requiring a strategic approach to consider the heritage opportunities and impacts presented by the redevelopment of the site.
	proposal proposes additions that overwhelm the existing school heritage building and does not give enough regard to the heritage significance of the	The SI project brief required a design to increase school capacity to 550 students (and corresponding architectural floor space to meet this quota). The FJMT design therefore responds to this requirement, and the HIS assesses the preferred solution reached with respect to this parameter. The strategic decision was made to focus additions and alterations on the 1940s purpose-built school building, reducing physical intervention and impact to other heritage items and State significant archaeology as much as possible. On balance, this was determined to be the best option
	item and its architect. The HIS does not provide independent assessment of heritage impacts. A wholly	of those explored via the master planning process, with the highest ability to reduce the overall impact to the holistic heritage values of the site.



independent and unbiased	As explained on page 201 of the HIS:
heritage assessment of the	"the preferred design for the FSPS Expansion has been reached via an exhaustive process of analysis of all
proposal is requested	possible options for the site- from which the current design has been identified as the option for the site tha
before conditioned	will present the smallest impacts to the heritage fabric, views and wider significance of the site"
approval.	
	Additional justification about selection of the 1940s school building as having greater tolerance for change than
	other heritage items (MET, Messengers Cottage) on the site (page 201):
	"In order to meet the SI brief and EFSG requirements for the development, sensitive modifications and
	additions to the Fort Street Public School building (constructed as a purpose-built public school building) an
	considered to be appropriate and preferential from a heritage perspective - rather than incur additional
	heritage impact to other heritage items not originally constructed as school buildings, or potential sub-sur
	archaeological resources present within the site. The proposed additions and alterations to the FSPS main
	building will facilitate the continuing use of the building for the school, of which adaptation is necessary to
	meet current educational requirements, guidelines and needs."
	And on page 201-202:
	"The proposed modifications and additions to the FSPS Building will retain the readability of its 1940s
	architecture, which, while exemplary at the time of its construction, is suitable for the application of evolvir
	modifications as required by the needs of school. The sensitive adaptation of the school building will in thi
	way serve as a heritage best practice example for ways in which the ongoing improvement and evolution of
	purpose-specific school buildings from this era can be applied to meet with modern educational standards,
	ensuring continuity of use as a public school, with facilities capable of delivery high quality education."



Page 202:
"The final iteration of this design process (as discussed in this HIS) is considered to be the best possible design option to reduce and/or balance heritage impacts, while meeting all of SI requirements to guarantee viability of the development. The identified heritage impacts will be offset and mitigated through careful detailed design (i.e. materiality and colour), heritage interpretation and archaeological investigation."



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