

4 April 2022

Our Ref: R/2017/28/D & R/2021/5/A
File No: 2022/104817
Your Ref: SSD-8993-Mod-3 & SSD-19989744

Brent Devine
Department of Planning and Environment
via Planning Portal

**Advice on EIS
SCEGGS Darlinghurst – Adaptive re-use of Wilkinson House
Concept SSD-8993 – Modification 3; and
Detailed SSD-19989744**

Dear Brent,

Thank you for your correspondence dated 3 March 2022 inviting the City of Sydney Council (the City) to provide advice on the abovementioned applications relating to the adaptive re-use of Wilkinson House at SCEGGS Darlinghurst.

SSD-8993-Mod-3

SSD-8993 relates to the Concept Approval for the SCEGGS main school campus, conditionally approved on 22 May 2020.

Modification 3 is a Section 4.55(1A) modification that seeks to amend the Wilkinson House building envelope and associated conditions.

No specific objections are raised with regard to the proposed modification to the Concept Approval (SSD-8993-Mod 3).

SSD-19989744

SSD-19989744 is a detailed SSDA that proposes adaptive reuse of Wilkinson House for general school learning areas and sport facilities to support the secondary school, including alterations and additions to the existing Wilkinson House.

The City's comments on the submitted EIS are outlined below:

1. Heritage

The City acknowledges that the retention of Wilkinson House is a positive outcome compared to the scheme that was originally proposed under SSD-8993.

The submitted Architectural Plans prepared by Smart Design Studio include removal of the entire roof and all internal fabric, except for the ground floor entrance lobby and hall. The proposal is not consistent with the conservation policies of the GML CMP 2001 due to the extent of demolition. This proposal was guided by the Urbis CMP 2021 and is

consistent with the intent of this CMP to retain and conserve the high significance facades of Wilkinson House and interpret the roof form.

The City recognises that change to this building is required, however, the extent of change is a point of disagreement. The proposal is driven by the desire to convert each floor into four open place classrooms, which results in removal of all existing internal spaces, elements and rooms including the balconies.

There will be complete loss of fabric and understanding of the original planning and layout of Wilkinson House due to the extent of demolition proposed. This level of internal demolition is generally not supported by the City for local heritage items. The City's general recommendations for this heritage item include:

There shall be no vertical additions to the building and no alterations to the façade of the building other than to reinstate original features.

The principal room layout and planning configuration as well as significant internal original features including ceilings, cornices, joinery, flooring and fireplaces should be retained and conserved.

Any additions and alterations should be confined to the rear in areas of less significance, should not be visibly prominent and shall be in accordance with the relevant planning controls.

The proposal does not include any external additions, except for a minor link and lift shaft on the southern side, which is supported. Removing the detracting security bars from the balconies and replacing them with inset glazing improves the appearance of the balconies and is also supported.

The extent of internal demolition proposed remains an issue for the City. To mitigate some of the loss of heritage values, the City requests that more internal interpretation and use of lost fabric be undertaken. Conditions of consent are therefore recommended, with the aim to partly alleviate the loss of heritage value of Wilkinson House.

Recommendations

The City's recommended conditions of consent are outlined in Attachment A at the end of this letter. The following key issues have been addressed by the recommended conditions:

- **Demountable classrooms** – These are to be removed within 3 months of occupation.
- **Floor levels** - As proposed, the ceiling level sits below the lintel level of the window openings. A condition is recommended that requires the proposed floor levels to match the existing levels, so that the relationship between the existing window and the balcony openings can be maintained.
- **Eave lining to roof** - It is requested that the proposed eave lining of the new roof match the existing in terms of detailing and design.
- **External shading** - The application has not provided details of the design and visual aesthetics of the proposed external shading system to Wilkinson House. These shading devices have potential to have significant visual impact on the appearance of the building and are not supported by the City. A condition is

recommended that allows for the balcony glazing to be setback further if required, to negate the need for shading devices.

- **Structural integrity** - The applicant has not yet provided a structural methodology for the significant demolition and excavation, whilst retaining and protecting the heritage fabric. Preparation of a detailed structural methodology report is recommended.
- **Salvage, reuse and recycling of materials** – It is recommended that any traditional building materials be salvaged and reused on the project.
- Additional standard conditions of consent relating to Conservation Work Schedule requirements, preparation of a Heritage Interpretation Plan, Photographic Archival Documentation, use of a heritage consultant and preparation of a Cyclical Maintenance Plan are also recommended.

2. Public domain

Insufficient information has been submitted with the SSDA to allow a complete assessment of the proposal and its impacts on the public domain. The following information is requested:

- A revised Flood Assessment Report which includes recommended flood planning levels that are compliant with the City's Interim Floodplain Management Policy.
- Public Domain survey plans are requested to enable confirmation of levels and grades at Forbes Street entrances and St Peters Street.
- Landscape Plans are required to be submitted to enable an assessment of any landscaping proposed adjacent to, or within, the public domain.
- Detailed calculation of the project cost.

3. Landscape

A Landscape Statement prepared by Context Landscape Architecture has been provided. However, no landscape drawings have been submitted, despite being referred to in the Architectural Plans.

Level 3 tree planter

A single tree (*Melaleuca linarifolia*) is proposed in a low raised planter. As designed, there is insufficient soil depth and volume (approx. <1m³) to support healthy tree growth and meet minimum compliance with the City of Sydney's Landscape Code.

The stormwater report does not provide any information about planter drainage and connections to the stormwater system.

It is unclear if the new Level 3 slab is designed to support the wet soil loads for a tree planter. If there is a new slab, then allowance for an amended design with a 1m high tree planter with adequate soil volume with a wall mounted perimeter seat should be made.

The inclusion of a tree is supported as it increases the urban canopy and amenity of the site. However, as designed there is insufficient information to demonstrate the viability of the tree planter design.

Green roof

The Urban Design Report notes that a green roof was not pursued due to height restrictions. The elevations suggest that this is not an issue on all frontages. An extensive green roof with a shallow green roof profile could be accommodated on roof areas that are clear of solar panels. Additional greening on the roof would increase the biodiversity of the site which would be a positive outcome.

Recommendations

- Landscape Plans are to be submitted for all landscape proposed at grade and upper levels. The plans must include tree planter details including any drainage and watering system and a plant schedule confirming all landscape proposed on the site.
- The tree planter is to be amended to meet compliance with the Landscape Code.
- The City recommends consideration of the inclusion of an extensive green roof to increase biodiversity of the site.

4. Transport and access

Overall, the proposal does not seek to increase the provision of car parking on the site and no changes are proposed to the student and staff numbers that were approved under the Concept SSDA. Therefore, the EIS concludes that traffic generation is expected to remain as previously assessed.

The proposal is generally supported from a transport and traffic perspective, subject to the following being addressed:

- **Transport Access Guide** – The guide is generally acceptable, however the chronology for the travel options to SCEGGS should be in reverse order to emphasise more sustainable transport options (ie. Walking – Bike – Train – Bus – Car).

5. Waste Management

It is unclear whether the Wilkinson House waste storage area will store its own waste separately to the SCEGGS site and therefore if its servicing will be separate.

The WMP mentions that more bins will be stored in the Wilkinson House waste storage room, however, it is not clear how many more bins are proposed and if there is sufficient space to accommodate this.

The following details are requested:

- Clarify whether the waste storage area will be storing waste from only Wilkinson House or both the SCEGGS larger site and Wilkinson House.
- The Architectural Plans should identify the location of the waste storage area and clearly mark the sizes and locations of all bins that will be stored at any given time.
- Bulky waste storage is to be provided in accordance with Council's Guidelines.

- The path of access to the waste storage and bulky waste storage areas is to be clearly indicated. The proposed storage areas are to be within 10m of the collection point.

6. Environmental Sustainability

It is acknowledged that the Roof Plan - DA104 shows the solar PV panels. It is requested that a note be added to this plan to clearly specify the details of the PV panels (eg. *"Photovoltaic panels – approximately 30 kilowatt peak capacity as per the ESD Report prepared by Northrop."*)

The City also requests that the ESD Report prepared by Northrop be referenced in any development consent issued by DPE.

Should you wish to speak with a Council officer about these comments, please contact Samantha Kruize, Senior Planner on 9265 9333 or at skruize@cityofsydney.nsw.gov.au.

Yours sincerely,



Andrew Rees
Area Planning Manager

ATTACHMENT A – RECOMMENDED CONDITIONS OF CONSENT

(1) DEMOUNTABLE CLASSROOMS

The demountable classrooms must be removed within three months of the occupation of Wilkinson House.

(2) RETENTION OF INTERNAL FEATURES

The entrance lobby and hall are to be retained in their entirety including wall, floor and ceiling finishes, fireplaces, timber joinery and carpentry, glazing, doors, windows, architraves, cornices, picture rails, skirtings, fixtures and fittings and moveable items.

(3) FLOOR LEVELS

The proposed floor levels must match existing levels so that the relationship with the existing window and balcony openings is maintained. Details reflecting this must be submitted for approval prior to demolition.

(4) EAVE LINING TO ROOF

The proposed eave lining to the new roof must match the existing in terms of detailing and design. Archival records should be undertaken to document the eave lining in detail to assist in the exact representation. The details must be submitted for approval prior to demolition.

(5) EXTERNAL SHADING SYSTEMS

Any shading devices have potential to have significant visual impact on the appearance of the building and are not supported. The balcony glazing should be setback further as required to negate the need for shading devices on the Wilkinson House facades. Alternatively, exemption to thermal compliance could be given based on heritage impacts.

(6) STRUCTURAL INTEGRITY OF RETAINED BUILDING ELEMENTS

A detailed structural methodology report prepared by a practicing structural engineer experienced in dealing with heritage buildings must be submitted to and approved by Council prior to the issue of any Construction Certificate.

The report must:

- (a) Include detailed design and large-scale drawings to explain how new concrete slab roof and walls will be constructed without interfering with the external walls of Wilkinson House.
- (b) Explain how the retained building elements, such as building facades, internal walls, foyer and floors are to be retained, supported and not undermined by the proposed development and provide details of any intervention, propping, underpinning or retrofitting required.
- (c) Explain the impact of vibration from excavation and provide mitigation methods where required.

(7) SALVAGE, REUSE AND RECYCLING OF TRADITIONAL BUILDING MATERIALS

Any stone, bricks, joinery, timber balustrade, timber floorboards, and decorative architectural elements to be demolished, which include stairs, windows and doors, architraves, skirtings, picture rails, cornices, fireplaces, chimney pieces and ceiling roses must be salvaged and reused on the project.

Salvaged building materials surplus to the project must either be stored on site for future reuse or transferred to an established second building material dealer for recycling. Existing concrete must be reused or appropriately recycled.

Documentation of the salvage, reuse and recycle methodology must be submitted for approval prior to the commencement of demolition, excavation or construction work.

(8) HERITAGE CONSERVATION WORKS

- (a) Prior to the issue of any Construction Certificate, a conservation work schedule detailing methodologies for implementation of the recommendations of the CMP Part 2 for SCEGGS Darlinghurst Wilkinson House prepared by Urbis dated 17 January 2022 and the Heritage Impact Statement for SCEGGS Darlinghurst Wilkinson House prepared by Urbis dated 17 January 2022 must be submitted to and approved by Council.
- (b) The schedule is to detail the conservation of all fabric identified as having a heritage significance including but not limited to the following stonework, brickwork, door and window joinery, glazing, hardware, pavements, signage and tiling,
- (c) The schedule is to be supported by outline specifications, methodologies and detailed architectural sections, elevations and plans at 1:20 and 1:5 scales. The details should incorporate any structural and/or building services design for the building.
- (d) The proposed works are to be carried out in a manner that minimises demolition, alterations and new penetrations/fixings to the significant fabric of the existing building.
- (e) All conservation and adaptation works are to be in accordance with the Articles of the Australian ICOMOS Burra Charter 2013. Appropriately qualified contractors and tradespersons are to be commissioned who are skilled in traditional building and engineering trades to carry out the proposed scope of works within the heritage building.
- (f) **INSPECTION AND APPROVAL:** The conservation works are to be progressively inspected and implemented to the satisfaction of Council's Area Planning Manager prior to the issue of any Occupation Certificate or commencement of the use, whichever is the earlier.

(9) HERITAGE INTERPRETATION PLAN

- (a) A Heritage Interpretation Plan for Wilkinson House must be submitted to and approved by Council's Area Planning Manager prior to any Construction Certificate being issued. The plan is to be prepared by a suitably qualified and experienced heritage practitioner or historian.

- (b) The original internal terrazzo staircase and timber balustrade must be interpreted in collaboration with an artist as part of the proposal. The details must be included in the interpretation plan and submitted for approval.
- (c) The interpretation plan must include reuse of skirtings, architraves, picture rails, doors, windows and timber floorboards within the proposal.
- (d) Further interpretation of the original planning and room layout must be included on each floor using floor or/and ceiling inlays.
- (e) The interpretation plan must detail how information on the history and significance of the Wilkinson House will be provided for the public and make recommendations regarding public accessibility, signage and lighting. Public art, details of the heritage design, the display of selected artefacts are some of the means that can be used. Future management and maintenance policies must be included as well as time frames for implementation.
- (f) The plan must include detailed design and specify the location, size, type, making materials and contents of the interpretation device being proposed.
- (g) Prior to occupation certificate being issued the approved interpretation plan must be implemented to the satisfaction of Council's Planning Manager.

(10) MATERIALS FOR MAKING GOOD

New materials for making good and repairs, are to match the existing in terms of colours, finishes, sizes, profile and properties.

(11) PHOTOGRAPHIC ARCHIVAL DOCUMENTATION

Prior to any Construction Certificate being issued, an archival photographic recording of the Wilkinson House is to be prepared to Council's satisfaction. The recording is to be in digital form, prepared in accordance with the NSW Heritage Division of the Department of Environment and Heritage guidelines titled "Photographic Recording of Heritage Items using Film or Digital Capture". One copy of the record is to be submitted to Council to be lodged with Council's Archives.

Procedure

For buildings or structures with heritage significance, the archival documentation, and the number and type of selected enlarged photographs required will be determined by the significance and quality of the building or structure. For a scope of work, refer to Council's Heritage Specialist to determine the particular architectural/design features of the building/site that may need to be recorded.

For buildings or structures with no heritage significance the archival documentation requirements are less comprehensive and may just be limited to contextual and exterior photographs only. However, this will depend upon the type, complexity and significance of the building, and should be confirmed with Council's Area Planning Manager.

Because significant fabric may remain concealed and only be exposed during construction works, the archival recording is to be undertaken in stages, prior to the removal of any significant building fabric or furnishings from the site, during the removal of fabric on site that exposes significant building fabric or furnishings, and after work has been completed on site, as considered appropriate by the

conservation architect commissioned for the project, and submitted as two parts as follows.

- (a) The first submission of the archival recording of significant building fabric or furnishings is to be prior to the removal of any significant building fabric or furnishings from the site, and must be submitted to and approved by Council prior to the commencement of any work on site and prior to a Construction Certificate being issued.
- (b) The second submission of the archival recording is of significant building fabric or furnishings that is exposed during demolition or construction and after work has been completed on site and must be submitted to Council prior to any Occupation Certificate being issued.

The form of recording is to be a photographic documentation of the site and its context, and the exteriors and interiors of the existing building(s) photographed, where appropriate, using a camera/lens capable of 'perspective correction'.

- (c) For each of the two submissions listed above in (a) and (b), the digital form of the recording is to be as follows:
 - (i) The Application number and the Condition of Consent number must be noted.
 - (ii) Include a summary report detailing the project description, date and authorship of the photographic record, method of documentation and limitations of the photographic record.
 - (iii) The electronic images are to be taken with a minimum 8 megapixel camera, saved as JPEG TIFF or PDF files with a size of approximately 4-6MB, and cross referenced to the digital catalogue sheets and base plans. Choose only images that are necessary to document the process and avoid duplicate images.
 - (iv) Include written confirmation, issued with the authority of both the applicant and the photographer that the City of Sydney is granted a perpetual non-exclusive licence to make use of the copyright in all images supplied, including the right to make copies available to third parties as though they were Council images. The signatures of both the applicant and the photographer must be included.
 - (v) The report can be submitted on a USB, or digital file transfer in PDF/A format (created directly from the digital original), with a digital catalogue of images with the following data for each location, image subject/description and date.

(12) USE OF HERITAGE CONSULTANT - MAJOR DEVELOPMENT

- (a) An experienced heritage consultant is to be commissioned to work with the consultant team throughout the design development, contract documentation and construction stages of the project. The conservation architect is to be involved in the resolution of all matters where existing significant fabric and spaces are to be subject to preservation, restoration, reconstruction, adaptive reuse, recording and demolition. The heritage consultant is to be provided with full access to the site and authorised by the applicant to respond directly to Council where

information or clarification is required regarding the resolution of heritage issues throughout the project.

- (b) Evidence and details of the above commission on the above terms are to be provided to Council prior to the issue of any Construction Certificate or commencement of work on site whichever is the earlier.
- (c) Throughout the documentation and construction stages of the approved works the experienced heritage consultant is to:
 - (i) Undertake site inspections of not less than fortnightly intervals.
 - (ii) Maintain a diary of site inspections that includes photographs of the works, details of heritage advice and decisions arising out of each inspection and any further physical evidence uncovered during the works.
 - (iii) Compile a final report, including the diary, verifying how the heritage conditions have been satisfied, and the works completed in accordance with the Conservation Management Plan.
- (d) Upon completion of the works, the final report is to be submitted for approval by Council's Area Planning Manager prior to the issue of any Occupation Certificate or the commencement of the use, whichever is earlier.

(13) CYCLICAL MAINTENANCE PLAN

A cyclical maintenance plan specifying frequency and methodologies to conduct building inspections and maintenance works to building elements and services must be submitted to and approved by Council's Area Planning Manager prior to the issue of any Occupation Certificate. The maintenance plan is to be prepared by a suitably qualified heritage consultant and endorsed by the building owner.