

13 June 2019

Mr Jim Betts, Secretary
Department of Planning and Environment
c/o Brendan Glynn, Multiplex Constructions

Our Ref: 16-0011Ncbg1_v2

**Re: One Carrington Street Project Section 4.55 Application (s4.55)—
Beneficial House—proposed new DDA lift and stair and floor changes—
Heritage Impact Assessment**

Dear Mr Betts,

We refer to the current Section 4.55 application (s4.55, formerly s96) to modify the current approval for the proposed One Carrington Street development. The scope of the modifications includes changes to the approved scope of works to Beneficial House at 285 George Street. Beneficial House is listed as a heritage item on Schedule 5 of the *Sydney Local Environmental Plan 2012* (Sydney LEP).

This letter provides an assessment of the potential impacts of the proposed modifications on the heritage significance of the building and any other heritage items in the vicinity. We do not address whether the revised scope of works has the potential to adversely affect the historical and Aboriginal archaeological potential of the development site. The letter also makes recommendations where appropriate for mitigation measures to address any additional heritage impacts arising out of the proposed works comprising the s4.55 application.

The content of this letter is limited to consideration of the potential heritage impacts of the proposed modifications to the April 2014 DA, as amended by the previous s96 applications, approved in August and September 2016.

The assessments and recommendations in regard to these modifications should be read in conjunction with the heritage reports prepared for the previous development approvals. These reports are:

- Beneficial House—Conservation Management Plan, Graham Brooks and Associates, 2004 (2004 CMP);
- One Carrington Street—Heritage Impact Statement, GML Heritage, May 2014 (2014 HIS);
- Beneficial House—Schedule of Conservation Works, GML Heritage, October 2015 (2015 SOCW);
- One Carrington Street Project Section 96 Application—Heritage Impact Assessment, GML Heritage, September 2016 (2016 HIS); and

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- One Carrington Street—Archaeological Assessment and Impact Statement, GML Heritage, March 2014 (2014 AAIS).

GML Heritage Pty Ltd (GML) has reviewed the preliminary documentation new lift and stair prepared by Make + Architectus in March 2019.

Background

In March 2014, GML was commissioned by Sovereign Wynyard Centre Pty Limited and its nominee Brookfield to prepare a Heritage Impact Statement (2014 HIS) for the proposed development known as One Carrington Street, Sydney. The development includes the demolition of the Menzies Hotel, 14 Carrington Street, and 301 George Street (formerly referred to as Thakral House); construction of a new commercial office tower; and works to two heritage buildings—the former Shell House, 2–12 Carrington Street, and Beneficial House, 285 George Street.

The project had received Concept Plan approval (No. MP09_0076) in April 2012, but excluded 285 George Street. The applicant was Thakral Holdings Group. The Concept Plan approval was subsequently modified by the addition of 285 George Street. A HIS (One Carrington Street—Heritage Impact Statement, GML Heritage, May 2014) was prepared to satisfy the DGRs. An archaeological assessment (One Carrington Street—Archaeological Assessment and Impact Statement, GML Heritage, March 2014), including Aboriginal and non-Aboriginal archaeology, was also prepared as a separate report. Conservation Management Plans (CMPs) for Shell House (HBO + EMTB, September 2005) (2005 CMP) and 285–287 George Street (Graham Brooks and Associates, April 2004) had been prepared previously, and provided the conservation policy basis for assessing the heritage impacts of the redevelopment.

A Section 96 application was approved in August 2016, which varied the scope of work to both Shell House and 285 George Street (Beneficial House).

A subsequent S96 application (lodged in September 2016) involved further modifications to the approved scope of work.

Original Building—Beneficial House

Attachment A includes a ground floor plan (Figure 1) and the Wynyard Lane elevation (Figure 2) of Beneficial House dated 1922. These drawings show that there was a stair in this southwest location providing access from the building to Wynyard Lane. Other drawings included in the 2004 CMP show that the building was originally designed with this stair connecting all levels (including the rooftop) to Wynyard Lane.

The existing floor consists of timber floorboards sitting on timber joists which are supported by steel beams and the perimeter masonry wall. The timber floor structure and floorboards are generally original to the 1923 building. There have been a number of later infills and changes to the flooring over time, such as infill of the lightwell in 1954 at Levels 1–2 (CMP, p 12), and later infill of the lightwell on the remaining upper levels in the 1970s. Attachment A includes a plan and section indicating the 1954 infill. Other changes to the floors include concrete slabs at the southern edge of the floors and timber infills of a former stair in the southwest corner.

Attachments B and E include selected current photographs of the building relevant to this application.

S96 Approved works—Beneficial House

Attachment C includes four plans showing the basement, Wynyard Lane, ground floor (George Street) and first floor levels (Figures 9–12) and the Wynyard Lane elevation (Figure 13) of Beneficial House, representing s96 approval of 2016. Previously approved voids, stairs and lifts are shown. The need for an accessible lift/stair and structural requirements affecting floor finishes and levels had not been identified previously.

Previous Heritage Advice

2005 CMP

The 2005 CMP identifies that externally the architectural composition of the Wynyard Lane façade, including facebrick work, multi-paned timber framed windows, the proportion of the openings and rhythm of openings to wall, is of high significance.

Internally, original flooring is identified in the CMP as being of high significance. Infill areas of floor structure (such as the floor structure and boarding in the location of the southwest stair removed in the 1970s) are of low significance.

Policies of the CMP allow for some adaptation of the interior, with the overall policy framework including:

Alterations to the internal layout and fabric is acceptable, provided there is no negative impact on elements identified as of high significance, in particular the original building structure and the external fabric and character. [2005 CMP, p 50]

Tenancy partitioning should not interrupt window openings. [2005 CMP, p 51]

The lifts and fire stair should remain in their present location together with the amenities and services block, along the northern boundary wall. [2005 CMP, p 51]

The 2004 CMP indicates the following in relation to significance of the floors as follows:

- The internal spaces were fitted out with Queensland maple stained to look like mahogany whilst the floors were polished jarrah with a neutral pale blue carpet (p 12).
- The floors and floor structure are indicated to be of high significance (p 40).
- The infilled floor areas relating to the lightwell infill are assessed to be of low significance (p 40).

2014 HIS

The 2014 HIS identified that the proposed design at the time, which included a new fire stair in the southwest corner of the building, complied with the above policies of the 2004 CMP, noting that it would be in the same location as the original fire stair, and would not require extensive alteration (p 78).

Recommendations of the 2014 HIS stated that the proposed new fire stairs should not obstruct or require infilling or removal of the original windows to the Wynyard Lane façade (p 88).

There is no reference in the HIS to change in relation to the floorboards.

2015 SOCW

The 2015 SOCW did not give specific conservation guidance for the fire stair in the southwest corner. With regard to the rear lane presentation of the building, the 2015 SOCW scope included the recommendation to:

Remove rendered masonry to create new openings aligned with bays of windows above and install new glazed metal doors (3 sets) and fixed panels.

The SOCW schedules show that work to all floors involves removal of modern coverings such as vinyl and carpet, and the floorboards are to be repaired, re-sanded and refinished.

2016 s96 HIS

In 2016, approval was given for a range of changes across the whole of the One Carrington site, including insertion of a new fire stair in the northwest corner of Beneficial House at all levels. The 2016 HIS assessed that the new fire stair would have some minor adverse impacts. Comment was made that the stair landing would cross behind the north end bay of windows on all levels.

Additional excavation required at the time was indicated to have the potential to impact locally significant historic archaeological features, and some risk to potential Aboriginal objects that may survive within the development site. The 2016 HIS advised that these potential impacts could be mitigated by archaeological monitoring during demolition works.

Flooring changes were not part of the 2016 application.

Current Proposal

Attachment D includes four plans showing the proposed basement, Wynyard Lane, ground floor (George Street) and first floor levels (Figures 14–19) and the Wynyard Lane elevation (Figure 20) of Beneficial House.

GML understands that the proposed modification involves:

- insertion of a new hydraulic lift and wrap-around open stair to the southwest corner of Beneficial House, providing fire access and accessible access to the retail tenancies on the four levels: concourse, George Street, Wynyard Lane and the first floor;
- additional excavation beneath the lift for associated services;
- demolition of significant floor structure on the first floor including a smaller area of infill floor (1970s). No additional demolition is required for levels below the first floor, as removal of one full bay of the Wynyard Lane and George Street levels was previously approved (to create a void). No original ceilings are understood to remain attached to the underside of Level 1 at this location; and
- a new doorway to the Wynyard Lane elevation of the building was previously approved. This doorway will be used for egress from the proposed new lift and stair to Wynyard Lane.

No detail has been provided at this stage for how the proposed new stair would connect to the western wall of the building.

Attachment F shows the original floor structure (section detail) and three options proposed by the structural engineer for providing a lightweight rigid diaphragm to each floor level of the building. Option 2 is proposed and GML understands the work proposed involves:

- existing timber floorboards to all levels to be carefully removed, and salvaged boards set aside for re-use;
- a new layer of ply sheeting to be installed on top of the existing floor joists on all levels;
- Levels 2–3 to be refloored over the ply with salvaged floorboards from these levels and from other levels in the building. This requires a careful approach to conservation of the significant window and door joinery and panelling where the floor level would be increased by approximately 30mm (refer to Attachment F); and
- Levels 4–6 to be refloored over the ply with new floorboards carefully selected to match the original timber type, colour and board profile.

Consideration will need to be given to conserving window and door joinery, panelling and skirting boards on Levels 2–3, ie where affected by the increase in floor level.

Reason for Design Modification

The current accessible lift and a separate stair design modification arises from the need to provide direct access for the retail tenancies of the lower levels of Beneficial House, to Wynyard Lane. Currently there is no DDA compliant access from Level 1 or the concourse level to Wynyard Lane. Floors above Level 1 are part of the principal tenancy and have access the main lift and stair core of the new development.

In regard to the flooring changes, Taylor Thomson Whitting identified structural requirements for the building in its Floor Option Study prepared in 2018. In summary, a rigid diaphragm is required to 'ensure an even distribution of load to lateral force resisting system and provide out of plane restraint to the perimeter masonry wall' and a lightweight structural design was recommended. This ruled out a structural diaphragm design within the future ceiling void (ie under the floor), which was the initial heritage recommendation. Attachment F shows the three structural design options presented by the structural engineer for providing a lightweight rigid diaphragm to each floor level of the building and impacting the flooring in different ways. These options were reviewed by Multiplex/Brookfield in consultation with GML, to achieve the desired structural result for the building and an acceptable heritage outcome.

Option 2 was selected as it will enable the original distinctive floorboards to be visible on Levels 2–3 within the building and covers the patchy aesthetic of the existing floor finishes and previous repairs / concrete infill (as was important to the client). This approach is a departure from the 2015 SOCW scope of works which was to conserve the all floorboards in situ. Adverse impact of removal of original floorboards will be mitigated by the reinstatement of salvaged floorboards on Levels 2–3 (the most grand spaces) and will enable the most authentic presentation of heritage character on these levels. Levels 4–6 will benefit from new timber boards, a quality finish also in keeping with the heritage character of these less grand spaces which also have significant window joinery. Alternatives considered included:

- Option 1—Retention of all existing timber floors in situ with a layer of structural ply over. New flooring (carpet or boards) would be fixed over the ply layer. Depending on floor finish, this would result in a greater floor level increase than currently proposed. While the original flooring would be retained in situ, it would not be visible.
- Option 3—Removal of timber floorboards and supporting structure, and replacement with a new mass cross-laminated timber (CLT) floor to span between the existing steel beams. While the removed timber floorboards could be reinstated over the CLT, this approach was not supported from a heritage perspective.

Heritage Impacts

The proposed new lift and stair are in the same general location as the original fire stair. Previous approval of a void at the western end of the building (Wynyard Lane and George Street levels), and removal of the remnant original southwest fire stair (lower levels), means that the only additional impact would be removal of timber floors (high significance) at first floor level. Some of this floor is infill structure from the 1970s (low significance). Demolition of the section of floor represents a minor additional adverse impact.

There is potential for the relationship of the proposed new stair to the western wall of the building to impact the timber windows and their joinery, as well a potential impact on the appearance of the building from the rear. Further detail is required to determine the extent of this impact.

The proposed structural rigid diaphragm will result in an additional adverse heritage impact to the building through loss of original flooring of high significance. This loss can be mitigated by the careful removal and reinstatement of salvaged boards to Levels 2–3. The increase in floor level by approximately 30mm will potentially impact the detailed joinery (wall panelling, architraves and skirtings including timber clad columns) on Levels 2–3 which extends to the floor. This impact can be minimised by a careful approach to retaining or modifying this detailed joinery. The removal of the infill floor areas of low significance would not have an adverse heritage impact. The impact of increase of floor level on Levels 4–6 is minimal and is limited to the skirting. Window joinery on these levels does not extend to the floor.

As for the 2016 s96 application, there are potential historical and Aboriginal archaeological impacts arising from additional excavation proposed under this modification.

Impacts on Other Heritage Items in the Vicinity

Heritage items in the vicinity include:

- Wynyard Park;
- Lisgar House; and
- Beneficial House.

The proposed change to Beneficial House is largely internal and will have no visual impact on heritage items in the vicinity.

Summary Conclusion and Recommendations

The revised scope of works under the current s4.55 application is required due to:

- the need to provide direct access, and an accessible lift, from Level 1 and below to Wynyard Lane. The location of the stair / lift is the same as the original fire stair for the building; and
- the structural requirement to provide a rigid diaphragm to all floor levels of the building. Original floor structure will remain, and salvaged floor boards can be reinstated on levels 2–3.

The revised scope will result in additional adverse impacts beyond those approved previously in the 2016 s.96 application, including:

- removal of some original floor structure of high significance on the first floor; the potential impact of the new stair on window joinery and on the appearance of the rear elevation of the building when viewed from the rear lane; and.
- removal of original floor boards of high significance on all floors and the potential for some impact on original joinery (wall panelling, architraves and skirtings including timber clad columns). Adverse impact of removal of original floorboards will be mitigated by the reinstatement of salvaged floorboards on Levels 2–3 (the most grand spaces).

It is recommended that specialist heritage advice is incorporated into the detailed design and construction phases to guide design of:

- the new stair and how it connects to the west wall of the building. Advice is anticipated to guide towards some separation of the stair from the wall, in particular where the stair and window coincide, and provide design input in regard to the stair balustrade.
- Removal of original floor boards, salvage process and reinstatement of floorboards generally, and where significant joinery could be impacted through a minor rise in finished floor level.

As for the 2016 s.96 application, the potential historical and Aboriginal archaeological impacts arising from additional excavation proposed under this modification can be mitigated by archaeological monitoring during demolition work, which is in line with the recommendations proposed in the 2014 AAIS.

The revised scope of works is generally acceptable in heritage terms.

We can be contacted if you require further details regarding heritage impact.

Yours sincerely,
GML Heritage



Catherine Macarthur
Associate

Attachments:

- A—Historic Drawings of Beneficial House
- B—Photographs of Beneficial House, Existing
- C—Extract of Documentation (Current s96 Approved Works)
- D—Extract of Documentation (Current Proposed s4.55 Works)
- E— Photographs of Beneficial House, Flooring / Joinery, Existing
- F—Structural Floor Bracing Options (Current Proposed s4.55 Works)

Attachment A—Historic Drawings of Beneficial House

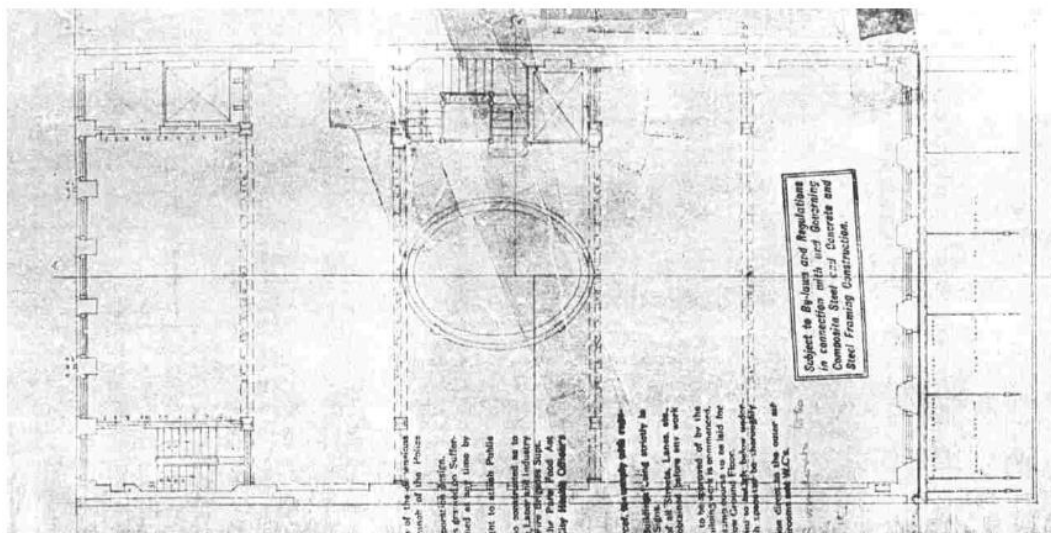


Figure 1 Beneficial House—First Floor Plan as documented in 1922. (Source City of Sydney Archives, BA 74/22, as presented in the Beneficial House CMP, 2004)

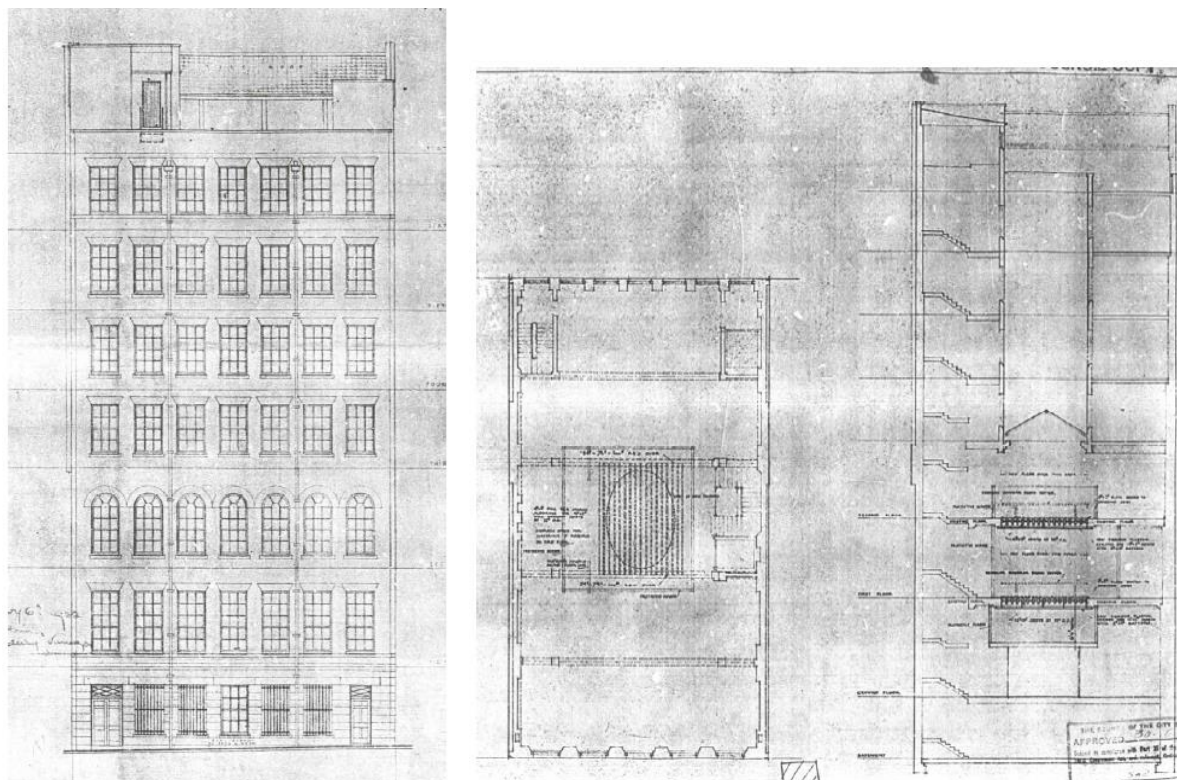


Figure 2 LHS: Beneficial House—Wynyard Lane elevation as documented in 1922. (Source City of Sydney Archives, BA 74/22, as presented in the Beneficial House CMP, 2004)
RHS: Beneficial House—First and second floor plan and section showing infill of the lightwell on the first and second floors, as documented in 1954. (Source City of Sydney Archives, BA 74/22, as presented in the Beneficial House CMP, 2004)

Attachment B—Photographs of Beneficial House, Existing



Figure 3 Beneficial House—Existing rear elevation at the southwest corner. (Source: GML 2015)



Figure 4 Beneficial House—Existing rear elevation viewed from above, showing windows adjacent to the proposed new stair/lift. (Source: GML 2017)

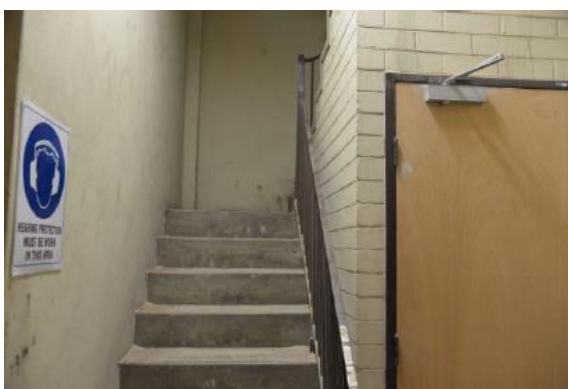


Figure 5 Southwest stair, ground to basement. (Source: GML 2017)

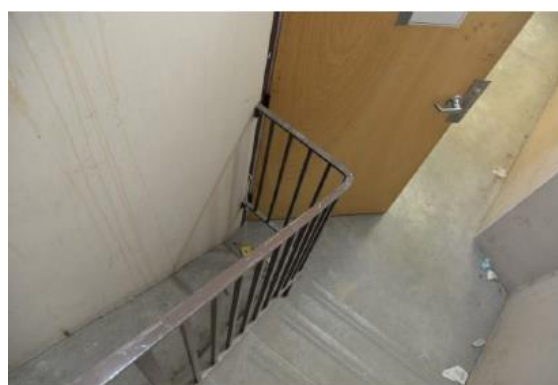


Figure 6 Southwest stair, ground to basement. (Source: GML 2017)



Figure 7 General view of the southwest corner of Beneficial House, ground floor level—view to the location of the original stair removed in the 1970s, except from the basement to the mezzanine level. (Source: GML 2017)



Figure 8 Enlargement of previous photograph, showing physical evidence in the ceiling of the former southwest stair at the Level 1 ceiling. Note the original timber window joinery. (Source: GML 2017)

Attachment C—Extract of Documentation (Current S96 Approved Works)

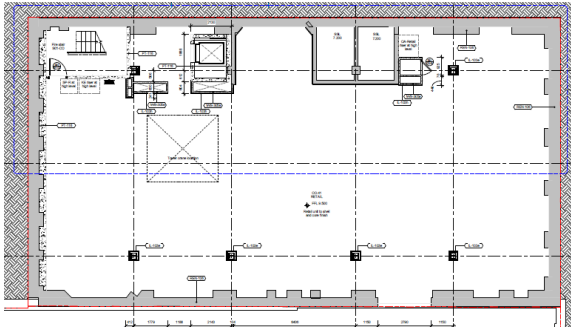


Figure 9 Beneficial House—Floor Plan, concourse level—showing proposed new stair and lift. (Source: Make + Architectus, A-285-11-03-0, 17 April 2019, similar to DA 2005 set issued 14 February 2017)

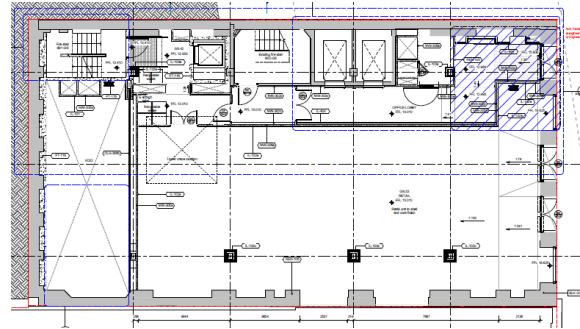


Figure 10 Beneficial House—Floor Plan, George Street level—showing proposed new stair and lift. (Source: Make + Architectus A-285-11-04-0, 17 April 2019, similar to DA 2005 set issued 14 February 2017)

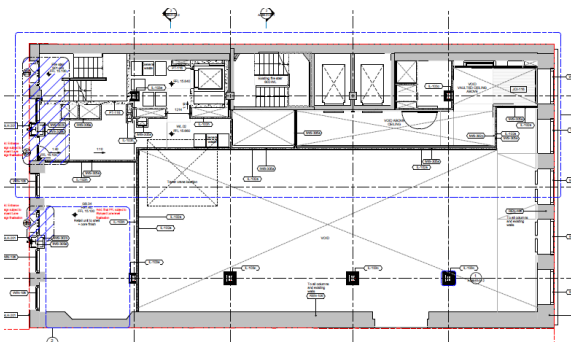


Figure 11 Beneficial House—Floor Plan, Wynyard Lane level—showing proposed new stair and lift. (Source: Make + Architectus, A-285-11-05-0, 17 April 2019, similar to DA 2005 set issued 14 February 2017)

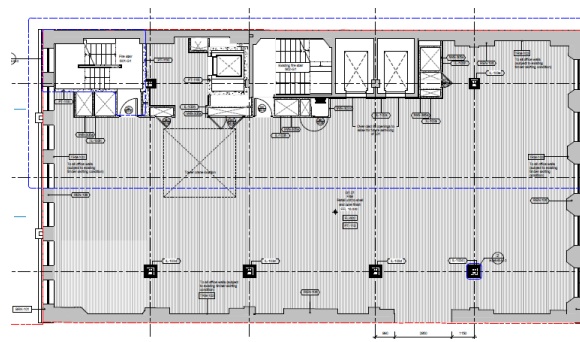


Figure 12 Beneficial House—Floor Plan, Level 1—showing proposed new stair and lift. (Source: Make + Architectus, A-285-12-01-0, 17 April 2019, similar to DA 2005 set issued 14 February 2017)



Figure 13 Beneficial House—Wynyard Lane elevation—showing approved changes to the rear lane façade of the building. (Source: Make + Architectus, A2301 set, 14 February 2017)

Attachment D—Extract of Documentation (Current Proposed S4.55 Works)

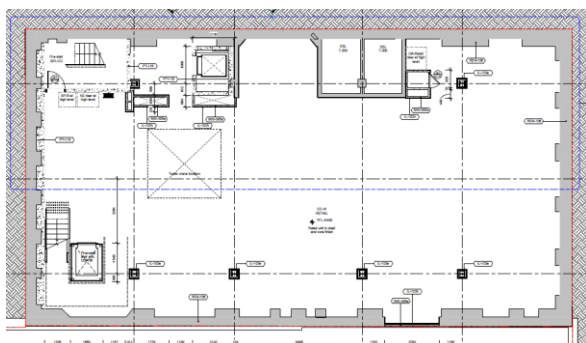


Figure 14 Beneficial House—Floor Plan, concourse level—showing proposed new stair and lift. (Source: Make + Architectus, A-285-11-03-0, 28 March 2019)

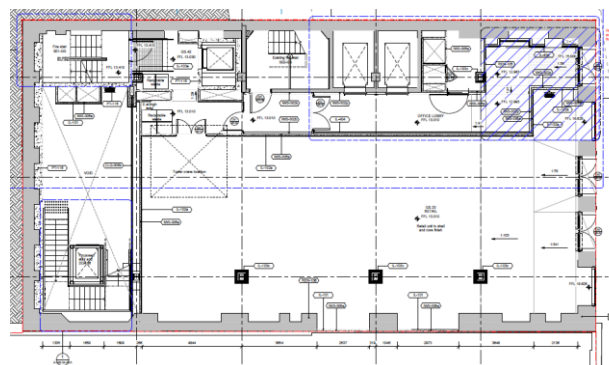


Figure 15 Beneficial House—Floor Plan, George Street level—showing proposed new stair and lift. (Source: Make + Architectus A-285-11-04-0, 17 April 2019)

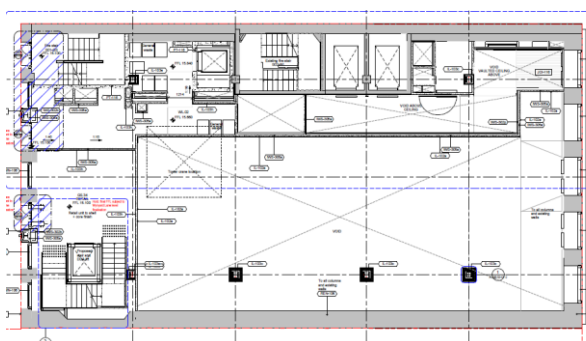


Figure 16 Beneficial House—Floor Plan, Wynyard Lane level—showing proposed new stair and lift. (Source: Make + Architectus, A-285-11-05-0, 17 April 2019)

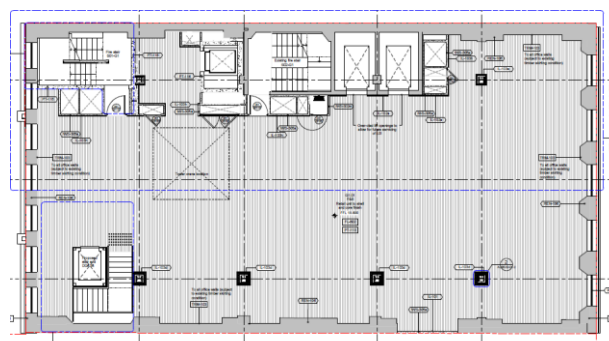


Figure 17 Beneficial House—Floor Plan, Level 1—showing proposed new stair and lift. (Source: Make + Architectus, A-285-12-01-0, 17 April 2019)



Figure 18 Beneficial House—Wynyard Lane elevation—showing proposed changes to the rear lane façade associated with the new stair and lift. (Source: Make + Architectus, A-285-20-32-1, 17 May 2019)

Attachment E—Photographs of Beneficial House Flooring / Joinery, Existing



Figure 19 Typical flooring detail at underside showing original timber floor structure and, at LHS of image, previous infill in the location of the southwest stair. (Source: GML 2017)



Figure 20 Typical flooring detail at underside showing concrete slab at south wall and 1970s infill of lightwell. (Source: GML 2017)

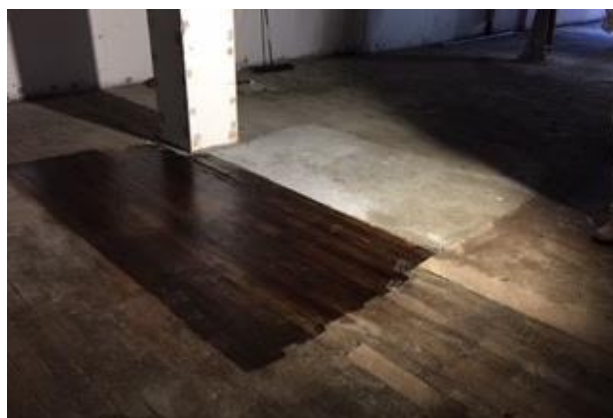


Figure 21 General view of polished floor, flush level concrete slab and sheet boarding over lightwell infill flooring at typical floor. (Source: GML 2017)



Figure 22 Level 3—door to juliette balcony, George Street wall. (Source: GML 2017)



Figure 23 Level 3—detail of timber panelling below window, Wynyard Lane wall. (Source: GML 2017)

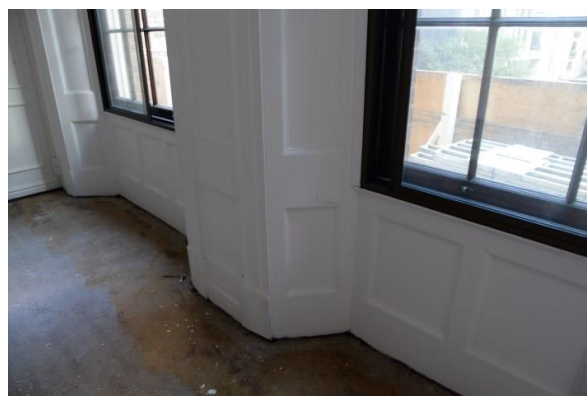


Figure 24 Level 2—detail of timber panelling, George Street wall. (Source: GML 2017)

Attachment F—Structural Floor Bracing Options (Current Proposed S4.55 Works)

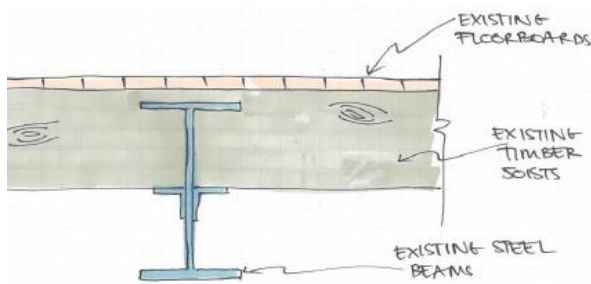


Figure 3: Section of existing floor build up (not to scale)

Figure 25 Existing floor detail (section). (Source: Floor Options Study, Taylor Thomson Whitting Pty Ltd, 2018)

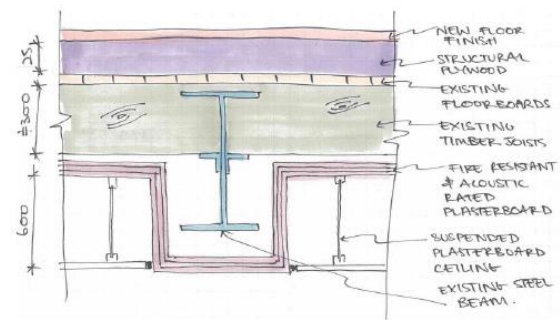


Figure 5: Section of plywood over timber floor option (not to scale)

Figure 26 Plywood over existing floor—structural detail option 1. (Source: Floor Options Study, Taylor Thomson Whitting Pty Ltd, 2018)

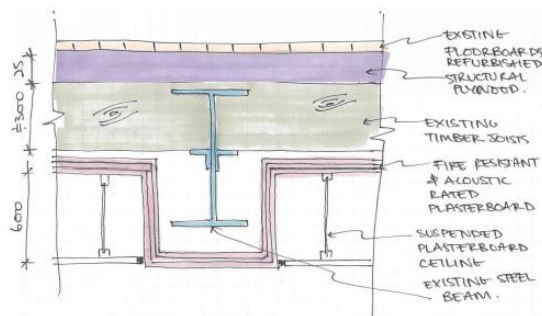


Figure 7: Section of plywood on existing timber joist option (not to scale)

Figure 27 Plywood on existing timber joists—structural detail option 2. (Source: Floor Options Study, Taylor Thomson Whitting Pty Ltd, 2018)

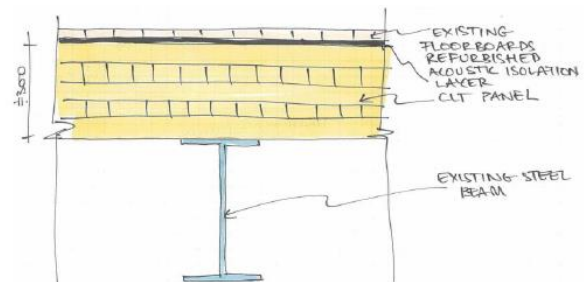


Figure 9: Section of CLT panel option (not to scale)

Figure 28 Mass timber flooring on existing steel beams—structural detail option 3. (Source: Floor Options Study, Taylor Thomson Whitting Pty Ltd, 2018)