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The Minister for Planning  
NSW Government, Department of Planning and Environment  
320 Pitt Street  
SYDNEY NSW 2000

Dear Sir,

**HERITAGE IMPACT STATEMENT  
PROPOSED DESIGN MODIFICATIONS - EDUCATION BUILDING  
35-39 BRIDGE STREET, SYDNEY  
S4.55 APPLICATION TO MODIFY SSD7484**

**INTRODUCTION**

This concise Heritage Impact Statement has been prepared to assess the impact of the proposed design modifications to the approved proposal for the Department of Education Building (Education Building) located at 35-39 Bridge Street, Sydney. The proposed design modifications, the subject of the S4.55 Application to Modify SSD7484, are required because:

- The architectural design has been further developed;
- The hotel brief has been further developed;
- Structural investigations and analysis by TTW have revealed vulnerabilities that must be addressed; and
- The contractor, who is very experienced with working on State listed heritage buildings, has concerns about buildability, protection of heritage fabric during construction and safety during construction.

The S4.55 Application is being submitted following approval of State Significant Development (SSD) Stage 2 Application Number SSD 7484, for the adaptive reuse of the Lands Building, located at 23-33 Bridge Street, Sydney, and the Education Building, located at 35-39 Bridge Street, Sydney as hotel facility. Both buildings have been described as the "Sandstone Precinct".

We understand that this Heritage Impact Statement will be submitted to the Department of Planning and Environment. Overall, we consider that the proposed design modifications will have an acceptable heritage impact in the context of the major adaptive reuse works that have been approved.

## METHODOLOGY AND STRUCTURE

This Heritage Impact Statement has been prepared in accordance with the guidelines outlined in the *Australia ICOMOS Charter for Places of Cultural Significance*, 2013, known as *The Burra Charter*, and the New South Wales Heritage Office (now the Heritage Division of the NSW Office of Environment and Heritage) publication, *NSW Heritage Manual*.

*The Burra Charter* provides definitions for terms used in heritage conservation and proposes conservation processes and principles for the conservation of an item. The terminology used, particularly the words place, cultural significance, fabric, and conservation, is as defined in Article 1 of *The Burra Charter*. The *NSW Heritage Manual* explains and promotes the standardisation of heritage investigation, assessment and management practices in NSW.

## SITE IDENTIFICATION

The Education Building (35-39 Bridge Street, Sydney) is located on the south side of Bridge Street and occupies a whole block bounded by Young Street to the east, Loftus Street to the west, and Farrer Place to the south. It is described by NSW Land and Property Information as Lot 56, DP 729620.

## HERITAGE MANAGEMENT FRAMEWORK

The statutory heritage management framework of the Education Building is as follows:

- Listed on the NSW State Heritage Register under the NSW Heritage Act 1977 (SHR No. 00726)
- Listed in Schedule 5 of the Sydney Local Environmental Plan 2012 (Item I684) as a State heritage item - Department of Education building including interior.
- Partially included (northern portion) in the Bridge Street/Macquarie Place/Bulletin Place Special Character Area identified in the Sydney Development Control Plan 2012.
- Partially included (southern portion) in the Farrer Place Special Character Area identified in the Sydney Development Control Plan 2012.

## REPORT LIMITATIONS

Archaeological assessment of the subject site is outside the scope of this report.

This report only addresses the relevant heritage planning provisions and does not address general planning or environmental management considerations.

This report should be read in conjunction with the Education Building Conservation Management Plans (CMP) prepared by GBA Heritage dated May 2017 and endorsed by the NSW Heritage Council in June 2017.

## ESTABLISHED SIGNIFICANCE OF THE SUBJECT SITE

The following Statement of Significance for the Education Building, located at 35-39 Bridge Street, Sydney is drawn from the updated and endorsed CMP for the Education Building prepared by GBA Heritage in 2017, which in turn was drawn from the 2015 CMP:

### **Statement of Significance:**

*The Department of Education building has been synonymous with the provision of universal public education in New South Wales since its construction in 1915 and is still used for its original purpose. [As part of the approved lease and adaptive reuse of the building, this association is to imminently cease]. The Department's association with the site dates from its establishment under the Public Instruction Act 1880. The southern half of the building, the former Department of Agriculture offices, demonstrates that Department's importance in the development of scientific agriculture and support for primary production when this was a major industry in the state in the first half of the 20th century.*

*The architectural style of the building, a restrained form of Federation Free Classical with plain facades highlighted by ornamentation at the entrances and upper floor entablature, is representative of contemporary tastes demonstrating external materiality and scale of the building in its original design by George McRae with Stage 2 (for the Department of Agriculture) being completed by a private firm, John Reid & Son.*

*The Department of Education building is a fine example of early 20th century government offices combining elements of their historic 19th century predecessors, with a concern for contemporary office design. Built in two stages 1912-15 and 1929-30, the building demonstrates rapidly changing methods in building construction of the early 20th century. The 1994-95 refurbishment by noted architect Ken Woolley provided a rational and elegant solution to the historic problems posed by key planning differences between the two stages of construction and resulted in efficient circulation and improved accommodation to contemporary standards.*

*Although the second stage of the building (1915 and 1930) was designed by a different architect using a different, more technologically advanced form of construction, the external architectural presentation of the two stages is remarkably unified or consistent. Occupying the of the city block bounded by Bridge Street, Loftus Street, Young Street and Farrer Place, the building is a key element in the built landscape of Bridge Street, in the surrounds of Macquarie Place and in Farrer Place to all of which it makes a notable contribution. It is part of an important group of late 19th and early 20th century government offices that represent the continuing association of this area with government and administrative activities since 1788. The site is part of a street plan that reflects the earliest development of the city of Sydney.*

*The Department's Art Gallery is unique in government offices and its student art collection, William Wilkins Memorial Art Collection, is the oldest in Australia.*

*The building is associated with key personalities in the history of education in New South Wales including Peter Board and Sir Harold Wyndham. It is also associated with Government Architect George McRae, who is considered as a key practitioner of the Federation Romanesque, Anglo-Dutch and Free Style in Sydney and whose work played a dominant role in the evolution and spread of Federation architecture throughout Australia.*

*The building has been the symbolic headquarters for generations of teachers and administration staff who have worked in the NSW education system since 1915.*

*The heritage significance of the Education Building is enhanced by the collection of movable heritage including furniture and war memorials. The movable heritage of the building has an ongoing and continuous association with the government function and demonstrates the building's association with public service. The collections of furniture and fixtures associated with public service and government administration demonstrate superior quality in local design, manufacturing and materials. The war memorials are of particular social significance for its commemoration of the role of Department of Education employees in war.*

*The site also has high potential for surviving archaeological remains of State significance including the site of the Judge-Advocate's residence, and gardens, boundaries and setting for the residences of the Judge-Advocate and the Colonial Secretary. These remains may survive below the Loftus Street vehicular entry and the northwest corner of the site.*

## THE PROPOSAL

- The proposed modifications, the subject of the S4.55 Application to Modify SSD7484, are required because:
- The architectural design has been further developed;
- The hotel brief has been further developed;
- Structural investigations and analysis by TTW have revealed structural vulnerabilities that must be addressed; and
- The contractor, who is very experienced with working on State listed heritage buildings, has concerns about buildability, protection of heritage fabric during construction and safety during construction.

The modified works have been developed with Urbis' heritage input to minimise adverse heritage impacts while adapting the building into a high quality, functional hotel facility.



The modified proposal is described in the following plans prepared by Make + Ridley:

Drawing Number	Drawing	Issue
SP-DA-G-1500	Proposed Site Plan	02
SP-DA-G-2496	Proposed Plans Education Building - Basement 03	03
SP-DA-G-2497	Proposed Plans Education Building - Basement 02	03
SP-DA-G-2498	Proposed Plans Lands Building – Lower Ground, Education Building - Basement 01	03
SP-DA-G-2499	Proposed Plans Lands Building – Ground, Education Building – Lower Ground	04
SP-DA-G-2500	Proposed Plans Lands Building – Level 01, Education Building – Ground	03
SP-DA-G-2501	Proposed Plans Lands Building – Level 02, Education Building – Level 01	03
SP-DA-G-2502	Proposed Plans Lands Building – Level 03, Education Building – Level 02	03
SP-DA-G-2503	Proposed Plans Lands Building – Level 04, Education Building – Level 03	03
SP-DA-G-2504	Proposed Plans Lands Building – Level 05, Education Building – Level 04	03
SP-DA-G-2505	Proposed Plans Lands Building – Level 06, Education Building – Level 05	04
SP-DA-G-2506	Proposed Plans Lands Building – Level 07, Education Building – Level 06	03
SP-DA-G-2507	Proposed Plans Lands Building – Level 08, Education Building – Level 07	03

Drawing Number	Drawing	Issue
SP-DA-G-2508	Proposed Plans Lands Building – Level 09, Education Building – Level 08	03
SP-DA-G-2509	Proposed Plans Lands Building – Level 10, Education Building – Level 09	03
SP-DA-G-2510	Proposed Plans Lands Building – Level 11, Education Building – Roof	03
SP-DA-G-2511	Proposed Plans Lands Building – Level 12, Education Building – Roof	03
SP-DA-G-2512	Proposed Plans Lands Building – Roof, Education Building – Roof	03
SP-DA-G-3200	Proposed Elevations Lands Building – South, Education Building - South	04
SP-DA-G-3201	Proposed Elevations Lands Building - West	04
SP-DA-G-3202	Proposed Elevations Lands Building – North, Education Building - North	04
SP-DA-G-3203	Proposed Elevations Education Building - East	04
SP-DA-G-3205	Proposed Elevations Education Building - West	04
SP-DA-G-3210	Proposed Elevations Education Building -Courtyard	04
SP-DA-G-3500	Proposed Sections Lands and Education Building – Section 01	04
SP-DA-G-3502	Proposed Sections Education Building – Section 03	04
SP-DA-G-4100	Façade Details Education Building – Glass Bay	02
SP-DA-G-4102	Façade Details Education Building – Garden Villa	02
SP-DA-G-4103	Façade Details Education Building – East and West Tower	02
SP-DA-G-4104	Façade Details Education Building – Level 9 Infill Cladding	01

Drawing Number	Drawing	Issue
SP-DA-G-4105	Education Building – Cooling Towers	01

### Basement 01- 03

- The basements have been reduced in scope and reconfigured, following geotechnical investigations, to ensure that the exceptionally significant facades are protected.

### Lower Ground Level

- The Lower Ground Level has been reconfigured including a replanned loading bay.
- The south west bar has been enlarged allowing greater public accessibility. Only a single window is now proposed to be adapted into a doorway rather than the approved four windows.
- The historic corridor wall in the north west corridor is being retained as per City of Sydney requirements.

### Ground Level

- Amendments to the interior layout including a replanned reception and concierge zone.
- Enclosing three windows in the public bathrooms.
- Creation of a new opening between Function Room 7 and 8 to provide increased flexibility..
- Deletion of the opening between Function Room 8 and 10 – both Exceptionally significant rooms.
- The historic corridor wall in the north west corridor is being retained as per City of Sydney requirements.

### Level 01-04

- Amendments to the interior layout including additional keys and deletion of winter gardens.

### Level 05

- Amendments to the interior layout including additional keys and deletion of winter gardens.
- The pool has been reduced in length and the 'wet edge' deleted. The corridor to the pool area from reception has now been centralised on the historic timber entrance doors.

### Level 06-09

- Redesign of the exterior of the vertical extension.
- Amendments to the interior layout including additional keys and relocation of plant.

## ASSESSMENT OF HERITAGE IMPACT

Overall the modifications are considered to have a relatively minor impact and are considered acceptable in the context of the imminent adaptive reuse works.

The reduction in the scope of excavation is considered to have a positive heritage impact because it will protect the Exceptionally significant facades.

The retention of the heritage wall in the north west corridor on the Lower Ground Level and Ground Level, as per City of Sydney requirements, will also have a positive, if minor, heritage impact.

The interior modifications are largely limited to the reconfiguration of new work that will generally have a neutral heritage impact. The appearance of the three Ground Level windows, required to be concealed, to provide public toilet facilities will need to be carefully designed to mitigate any potentially adverse visual impacts when seen from the public domain.

The modifications to the approved proposal are largely limited to fabric of Moderate significance. The endorsed CMP for the Education Building prepared by GBA Heritage in May 2017 identifies the following policy for fabric of Moderate significance:

### **Policy 6.9.5 ELEMENTS OF MODERATE SIGNIFICANCE**

- *In areas of Moderate significance, aim to retain all significant fabric as a first conservation option.*
- *Any work which affects fabric, spaces or relationships with a Moderate assessed heritage value should be generally confined to preservation, restoration, reconstruction or adaptation as defined in the Burra Charter.*
- *If adaptation is necessary, minimise extent of change and impact on significance. Some adaptation of elements may be acceptable.*
- *Work involving the alteration, reduction (or even the removal) of a particular element may be an acceptable option where it is necessary for the effective reuse and proper function of the place and does not reduce the overall significance of the place.*
- *Undertake all new work in accordance with the policies in this Conservation Management Plan.*

Some Exceptionally significant fabric is adversely affected to increase the flexibility between Function Room 7 and 8. Function Room 8 is regarded as being Exceptionally significant and the removal of the wall has been mitigated by the retention of nib walls, a line in the flooring and the retention of a bulkhead with operable doors to interpret the original configuration. The impact is also offset by the deletion of the approved opening between Function Room 8 and 10.

The endorsed CMP for the Education Building prepared by GBA Heritage in May 2017 identifies the following policy for fabric of Exceptional significance:

### **Policy 6.9.3 ELEMENTS OF EXCEPTIONAL SIGNIFICANCE**

- *In areas of Exceptional significance, aim to retain all significant fabric as a first conservation option.*

- *Any work which affects fabric, spaces or relationships with an Exceptional assessed heritage value should be generally confined to preservation, restoration, or reconstruction.*
- *Work involving the alteration or reduction of a particular element may be an acceptable option where it is necessary for the effective reuse and proper function of the place and does not reduce the overall significance of the place.*
- *Give preference to changes that are reversible.*
- *Undertake all new work in accordance with the policies in this Conservation Management Plan.*
- *Prior to any change, full archival recording is essential.*

The vertical extension has been redesigned and, in our opinion, is an appropriate, high quality design response that will have an acceptable heritage impact. The restrained structure sits within the approved and modified Stage 1 envelope. The redesigned structure maintains the visual prominence of the existing building, and the legibility of its composition, architectural style, form and features and defers to the existing form. The Level 06 masonry structure effectively reduces the visual scale of the vertical extension. The proposed articulation, materiality, finish and regular structural grid of the façade of Level 07-09 responds appropriately to the materiality and classical design language of the historic sandstone structure. The central bookends on the east and west façade respond appropriately to the historic building's central canted bay windows in a finely detailed, sensitive, contemporary manner.

Views of the modified vertical extension will be visible when seen from the surrounding streets. However, given the high quality of the proposed design it will have an acceptable impact on views of the Education Building. The modified addition will not lessen the contribution that the building makes to the surrounding area, while elegantly providing considerable additional accommodation.

The CGI views of the proposed changes to the roofscape from various ground level, public domain viewpoints within nearby streetscapes provides the necessary visual evidence of this outcome. The endorsed CMP for the Education Building prepared by GBA Heritage in May 2017 identifies the following policy for fabric of Exceptional significance:

The modified proposal is also in accordance with the following policies identified in the endorsed CMP for the Education Building for vertical extensions:

***Policy 6.11.1 BUILDING FORM***

*Retain the existing sandstone-clad component of the historic building when seen from the public domain.*

***Policy 6.11.2 VERTICAL EXTENSION***

*Vertical extensions up to the height identified in the Stage 1 Approval SSD 6751 (or its approved modifications) approved envelope are permissible.*

***Policy 6.11.3***

*Any roof top additions must be designed in a well articulated manner, and to be scaled and sited such that they do not challenge the architectural scale, power and dominance of the main building volume.*

**Policy 6.11.4**

*Any vertical additions should be designed to be setback from the stone parapet in a manner that respects and complements the building's significant architectural style, features, form and significant views.*

**Policy 6.11.5**

*Additions involving any adverse intervention to the roof top sky lanterns, located over the Gallery, Annex and eastern spaces, should not be permitted.*

**Policy 6.11.6**

*Any roof top additions must be of contemporary design, be of design excellence and must employ superior construction materials that are sympathetic to the significance and appearance of the historic building and its significant views.*

Overall the modifications will have an acceptable material impact on the historic fabric of the building in the context of the approved major adaptive reuse works.

## CONCLUSIONS

The design modifications will have an acceptable material impact on the historic fabric of the building in the context of the major adaptive reuse works. The proposed modifications, the subject of the S4.55 Application to Modify SSD7484, are required because:

- The architectural design has been further developed;
- The hotel brief has been further developed;
- Structural investigations and analysis by TTW have revealed structural vulnerabilities that must be addressed; and
- The contractor, who is very experienced with working on State listed heritage buildings, has concerns about buildability, protection of heritage fabric during construction and safety during construction.

The modifications have been developed with Urbis' heritage input to minimise adverse heritage impacts while providing reasonable amenity as the building is converted to hotel use. In particular:

- The reduction in the scope of excavation is considered to have a positive heritage impact because it will protect the Exceptionally significant facades;
- The interior modifications are largely limited to the reconfiguration of new work that will generally have a neutral heritage impact; and
- The vertical extension has been redesigned and, in our opinion, is an appropriate, high quality design response that will have an acceptable heritage impact. The redesigned structure maintains

the visual prominence of the existing building, and the legibility of its composition, architectural style, form and features and defers to the existing form.

The modified proposal is in accordance with the intent of the endorsed CMP prepared by GBA Heritage. The proposal is also considered to be in accordance with the relevant heritage requirements of the *Sydney Local Environmental Plan 2012* and the guidelines of the *Sydney Development Control Plan 2012*.

Overall the proposal is considered to have an acceptable heritage impact on the significance of the Education Building in the context of the major adaptive reuse work.

## RECOMMENDATION

The proposed modifications will have an acceptable impact in the context of the major adaptive reuse works approved by SSD7484 to adapt the building to hotel use. On this basis we recommend that the Department should have no hesitation, on heritage grounds, and approve the S4.55 Application to Modify SSD7484.

We recommend that the appearance of the three Ground Level windows, required to be concealed, to provide public toilet facilities will need to be carefully designed to mitigate any potentially adverse visual impacts when seen from the public domain.

Should additional information be required, please do not hesitate to contact the undersigned.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Jonathan Bryant".

Jonathan Bryant  
**Director Heritage**