

Weir Phillips Heritage

22 September, 2017

The Director
Social Infrastructure Assessments
Department of Planning and Environment, Planning Services
GPO Box 39
Sydney NSW 2001

Re: State Significant Development Application for the Inner Sydney High School (SSD 7610)

Dear Sir/Madam

I have been asked by the Department of Education to address a number of heritage issues raised in the following letters prepared in response to the above submission:

- City of Sydney: Development Application for the Inner Sydney High School (SSD 7610). Sydney Council Reference No.: R/2016/15A. Dated 15 August, 2017.
- Heritage Council of NSW: Comment and recommended conditions of consent for the new Inner Sydney High School, No. 242A and 244 Cleveland Street, Surry Hills, Sydney City LGA (SSD 16-7610). Heritage Council Reference: DOC17/332300. Dated 18 August, 2017.

Weir Phillips Heritage prepared a Heritage Impact Statement (HIS) to accompany the initial SSD Application. This statement is hereafter referred to as the HIS May 2017.

FJMT have amended the SSD plans in response to the submissions received. The following takes into account the amendments made. The following should be read in conjunction with the revised HIS dated September 2017. Issues raised with regard to archaeology are addressed by others.

The Issues

City of Sydney

Issue 1: Impact on the Park

The height and bulk of the 14 storey building will impact on the setting of the park.

Issue 2: Impact on the Retained School Buildings of the Tower

The City acknowledged that it is unavoidable that the desired visual curtilage of the heritage buildings is intruded upon. They, however, consider that some aspects of the design could be reconsidered with regard to:

- Impact on views towards the spire of Building 2A and on the north eastern courtyard.
- Impact on the main courtyard.
- Impact of the proximity, massing and scale of the tower.
- Impact of the proposed connections between buildings.

Issue 3: Impact of Reuse and Alterations to the Existing Heritage School Buildings/Grounds

The issues raised can be summarised as follows:

- Impact of the new entrance from Chalmers Street, particularly on Building C.
- Treatment of the openings left by the removal of the links.
- Retention and incorporation of the palisade fence along the southern boundary.

Heritage Council

Issue 1: CMP Summary Statement of Significance

The Heritage Council raise issues with the CMP summary statement of significance and the way in which local and state significance are defined.

Issue 2: Inconsistencies with the CMP Rankings

A number of the proposed works appear to be inconsistent with the CMP rankings of significant elements and either require revision or better justification. The examples given are the removal of mature trees and the proposed raised north western courtyard.

Issue 3: Proposed Tower Height and Design

The proposed tower's height and design are over dominant and intrusive on the school site's sale and setting and also on the adjacent Prince Alfred Park.

Responses

City of Sydney

Issue 1: Impact on the Park

The City acknowledge the following:

- That there are historic links between the park and the school, with the latter using the park for activities and, at one time, acquiring part of the park for expansion.
- That while three low rise complexes define the corners of the park- the two other complexes being Greek Orthodox Church and the Railway Institute- visual connections between them are weak because of physical separation.
- That while the proposed building will obviously be visible from the Greek Orthodox Church, the existing trees will mitigate the impact.
- That from most vantage points within the park, the new building will appear on top of the surrounding trees so that, from the northern section of the park, it will not appear conspicuous.
- That the visual impact on the main north-south running path is acceptable, although reliant on the ongoing existence of mature trees.

The Council concerns relate to the following:

- The visual bulk and height of the new building as seen from the southern part of the park, in particular: from the land on the southern side of the swimming pool; from the south eastern corner

of the park; and east of the mature trees running along the north-south line shown in an attached image.

The Council suggest that:

‘A slender and simpler form of the tower, along with a decrease of the storeys at the podium, would reduce its visual impact to the setting of the park. While the proposed variations of external finishes on the tower and podium help in breaking up their scale, they also create complexity in appearance and a possible visual clutter. The complex form of the building overall may be considered to have certain detracting from the landscaping setting in the vicinity and the simple and solid built environment at the distance.’

FJMT have prepared revised plans in response to the concerns raised about the massing and scale of the tower. These changes have reduced the visual impact in the following ways:

- The number of studio levels have been reduced from three to two, reducing the bulk and scale of the lower part of the building.
- The ‘twist’ of the tower has been removed, making it appear slenderer, particularly from the north and south. It is noted that the tower proposed by FJMT was the slenderest tower form of the participating schemes.
- The building form- at podium, studio and tower level- has been simplified and the façade detailing and finishes further resolved to reduce complexity and improve buildability. The interface of the podium with the park, and hence its contribution to the landscape setting, has been improved by straightening the façade junctions to better respond to the park’s geometries; by introducing off-form concrete, which responds to the materiality of the curving pathways in the park; and by further developing the podium edge at each level to mitigate the scale of the building when seen from the park. The studio façade has been further refined to provide a ‘quieter’ background to the heritage buildings. The masonry will now be a panellised terracotta that compliments the brickwork of the heritage buildings, providing a form of differentiation, without overwhelming them.

While the complexity of the detailing is reduced, sufficient variation is retained in detailing to help break up massing and scale.

Issue 2: Impact on the Retained School Buildings of the Tower

Each of the particular impacts identified by the City are addressed below:

- Impact on views towards the spire of Building 2A and on the north eastern courtyard; and impact on the roofscape of the heritage buildings.

It is noted that a view of the heritage buildings with the new building to the rear from Chalmers Street was provided as part of the drawing package. A revised view is also provided as part of the revised submission (Figures 1 and 2 below).

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Figure 1: SSD Scheme.
FJMT.



Figure 2: Amended Scheme.
FJMT.

As stated in the original HIS, the new building has been carefully located on the site in order that Buildings 1, 2 and 3 and the significant courtyards are retained; and in order to manage overshadowing issues. In this location, and given the size constraints of the site, the upper storeys of the podium (i.e. the studio) and the tower will be unavoidably visible in the backdrop of the heritage buildings on approach along Chalmers Street in either direction and when standing directly outside of the site on Chalmers Street. It is also acknowledged that the tower will also appear as a major element on the western side of the north eastern courtyard.

As stated in the original HIS, the impact is mitigated by:

- The setback of the new building 52m from Cleveland Street. This setback is sufficient for the roof line of all the heritage buildings to remain clearly legible on approach along Chalmers Street from the north.

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- The splitting of the tower into two main components. Given that the podium and tower are unavoidably visible, the impact must be managed through design. Splitting the tower into clear vertical and horizontal elements helps to manage massing. The heritage buildings contain strong horizontal and vertical forms, with a vertical emphasis to openings. The highest point is the 'Verandah' element, expressed as a slender finely grained vertical volume, making reference to the steeple of Building 2. Cladding elements are more light weight than for the 'The Studio' below in accordance with Policy 69 of the CMP.

It is further noted that the tower is as far removed from the north eastern courtyard as it is possible to be on this site. The element that relates most directly to the north eastern courtyard is the podium, including the studio. Reducing the height of the studio by a level lessens the impact on the north eastern courtyard. Reducing the height of the studio also opens up more of the skyline directly behind the heritage buildings at the northern end of the site, improving view corridors from opposite the site.

- Impact on the main courtyard.

The City observe that part of the northern façade of Building 1B is partially obscured and that this could be avoided if a minor design change is made.

As acknowledged by the City of Sydney, the architects have endeavoured to maintain views towards Buildings 1 and 2 from the main courtyard by providing a three-storey void in the lower levels of the south eastern corner of the new building. For the school to function efficiently on this very constrained site, there are some areas where there is unavoidable proximity of the new building to the heritage buildings. It is commendable that only one elevation- and in this instance, a lesser elevation- in this courtyard is impacted upon. The part of the northern façade that is partially obscured is the least articulated of the building elevations addressing the main courtyard; the greater part of the ground and first floor levels are unrelieved, blind, brickwork (Figure 3).

The design has been further revised in line with the City's comments. The gap between this elevation and the new building has been increased and the width of the proposed link decreased to improve the legibility of the elevation and the building.



Figure 3: Northern elevation of Building 1B from the main courtyard.
WP Heritage.

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- Impact of the proximity, massing and scale of the tower; and
- Impact of the proposed connections between buildings.

In the City's opinion, the proximity of the new building to the heritage items is the main contributor to its 'imposing impact.' It is further noted that the proposed connections between the new building and the heritage buildings are 'not duly respectful to the heritage buildings. The following recommendations are provided:

- Increase the gaps between the old and new, weakening the links between the buildings. A larger gap and reduced links would expose the heritage facades which are otherwise obscured and maintain the intact forms and appearance of the heritage buildings from the western courtyards.
- Connections between new buildings and adjacent buildings should be discreet bridges, as opposed to continuous walkways.

The degree to which the gaps can be increased and the links reduced in width whilst still allowing for the school to function safely and efficiently is limited. The revised design, however, does achieve an increase in the gaps between buildings and a reduction in the width of links.

Issue 3: Impact of Reuse and Alterations to the Existing Heritage School Buildings/Grounds

Each of the particular impacts identified by the City are addressed below:

- The impact of the lower level rooms beneath the new entrance off Chalmers Street.

The City acknowledge the opportunity to provide better circulation within the school and support the location of the proposed main entrance, with the exception of the impact of the proposed new rooms at lower ground floor level on the intactness of the courtyard and the integrity of Building C. The suggestion is made that the entry and walkway be constructed in a reversible manner and that the courtyard be largely retained.

The plans have been amended as follows:

- The area to be enclosed beneath the raised courtyard is significantly reduced. The majority of the north eastern courtyard at lower ground floor level is now retained as open space, reflecting its historic and aesthetic significance as an courtyard. The proposed infill is moved away from the southern elevation of Building 3, significantly lessening the impact on the southern elevation of Building 3.
- At street/ground level, the gap between the courtyard and the southern elevation of Building 3 is improved. It was previously proposed to glaze this gap; it will now be left open, improving the legibility of the building.
- At street/ground level, the gap between the courtyard and the northern elevation of Building 1 is reconfigured, improving the gap between the courtyard and the eastern end of the northern elevation of Building 1, which includes an original flight of stairs. While the gap is improved, the stairs will still not be as visible as they currently are. The impact is mitigated by the fact that stairs will remain visible from within the site at lower ground floor level and from the edges of the new courtyard. While visible in view corridors towards Building 1A from outside of the site and on approach along Chalmers Street from the north, the stairs are not a critical architectural element in being able to understand and appreciate the overall form and architectural style of the building.
- At street/ground level, the bridge between the street and the new building has been reshaped. This, combined with the reduction in the number of new rooms at lower ground floor level, improves the understanding of the open spaces of the original courtyard below.

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View corridors down into the site towards the lower level of the existing buildings are improved but remain less than the existing. In mitigation, it is noted that these view corridors are less significant than view corridors at and above street level. Views into the courtyard have not always been open. Historic photographs clearly show a solid paling fence across this part of the boundary, blocking views into the lower part of the site.

- The contemporary infills to the openings left by the removed walkways are not supported.

The initial SSD design proposed contemporary infills to the opening where the existing walkways will be removed. The City request that the original openings and joinery be reinstated. It is not proposed to amend the plans to comply with this recommendation.

There are two main accepted approaches to reconstruction work:

- Reconstruction to match a previously known state.
- Contemporary infill that acknowledges the change as part of the history of the site.

FJMT have been engaged to provide a stimulating environment. Areas of past works provide opportunities for adaptive works. The existing links, while visually intrusive, are part of the history of the way in which the site has been used. The proposed treatment is an acknowledgement of the Post World War II phase of the site history, the other fabric of which, being Building 4, is being completely removed from the site. The Interpretation Strategy for the site will use these new elements to help explain this phase of the site's history. An award-winning precedent is provided by FJMT's work at the Mint Building, in Macquarie Street. Refer to Figure 4.



Figure 4: Modern treatment of earlier window openings at The Mint, Sydney.
<http://sydneylivingmusems.com.au>

- The southern boundary fence.

It is confirmed that the existing palisade fence along the southern boundary will be retained.

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Heritage Council

In responding to the comments from the Heritage Council, it is noted that the site is not currently listed on the State Heritage Register.

Issue 1: CMP Summary Statement of Significance

Weir Phillips Heritage did not prepare the CMP for this site. Given that this CMP was very recently prepared, Weir Phillips have not been engaged to update it. If it is proposed to nominate the site for listing on the State Heritage Register, then the summary statement of significance provided by the CMP should be amended to accompany the nomination.

Issue 2: Inconsistencies with the CMP Rankings

The Heritage Council note that some of the proposed works are inconsistent with the rankings of the CMP. The specific examples raised are the removal of trees in the main courtyard (being contrary to Policy 25, which relates to the retention of mature trees) and the changes to the north eastern courtyard (being contrary to Policy 21, which states that no new development should occur in this courtyard).

The significance rankings provided in the CMP are generally agreed with. The CMP acknowledges that a larger building may need to be built upon the site and also the desirability of retaining an educational use. A number of the CMP policies, however, make little concession to the constraints arising out of the size of the site and the requirements of a modern school expected to accommodate 1,000 students. While it would be desirable to always comply with the policies of the CMP, some non-compliances are the inevitable result. The amended plans and HIS resolve some of the non-compliances presented by the original proposal and/or to provide additional justification for the action taken.

For example, with regard to the specific examples cited:

While the removal of trees is subject to other approvals (not this SSD), the following is noted:

A comparison between historic aerial photographs and current aerial photographs reveals the extent of changing patterns of vegetation on the site over time. For much of its history, the central courtyard was an open, bitumen-surfaced space in which, during some periods, ancillary buildings were located. There were few, if any, substantial trees in this area. Only two trees/groups of trees are identified as being of historic significance by the *CMP 2016*, being Tree 1 (Queensland Kauri), Tree 17 (Morten Bay Fig) and Tree 18 (Morten Bay Fig) in the above table. These trees are retained and protected by the proposal in accordance with Policy 25 above. The London Plane Trees and eucalypts in and around the central courtyard (Trees 11, 13, 15 and 16) and the Fig Tree (Tree 9) in the north western courtyard are identified as having moderate significance by the *CMP 2016* for the amenity that they provide. It is for this reason that these trees are included in Policy 25. While it would be desirable to retain these trees, the design constraints on the site are such that their retention is not possible. The site is small and the numbers of students that are required to be accommodated high. London Plane trees also cause known problems with asthma, which is of concern to the Department of Education. It is not possible to retain these trees and achieve a reasonable outcome for the new school. The impact is mitigated by:

- The fact that these trees are clearly identified by the *CMP 2016* in relation to the amenity they provide. They are not of historic significance and were most likely planted after the works carried out in the late 1960s. Their growth to maturity has fundamentally changed the historic character of the courtyard.

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- The impact of removing these trees and other trees not ranked by the *CMP 2016* is mitigated by the proposed new landscaping that will be carried out on the site.
- The significant trees immediately adjacent to the site, which help express some of the historic relationships that exist between the school and Prince Alfred Park – notably those to the north and south west of the site's boundary- are retained.

The other example raised is the development in the north eastern courtyard. The proposal has been amended to significantly reduce the impacts on the north eastern courtyard as discussed above.

Issue 3: Proposed Tower Height and Design

The issues raised by the Heritage Council are similar to those raised by the City of Sydney. Refer to the responses above.

Additional Comments

The Heritage Council recommend the following conditions of consent with regard to historic heritage:

- 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. The 2016 Conservation Management Plan should continue to guide the detailed design phase.
- 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.
- A record of proposed works should be maintained consistent with conservation policy 8 of the 2016 Conservation Management Plan.
- 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.
- Where storage or future reinstatement is not possible, they should be offered to a reputable storage yard.
- A Schedule of Conservation Works should be prepared and its recommendations implemented.
- 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.
- 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.
- 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.
- 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

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reduced to ensure the non-compaction of the root zones of these significant trees, to the satisfaction of a qualified and experienced arborist.

- 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.
- 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.
- 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.

All the above conditions, with the exception of the last condition, are appropriate. Once approval is obtained, there is no provision to provide further justification for proposed works. Consultation with the Heritage Division is not mandatory, given that the site is not listed on the State Heritage Register, and is at the discretion of the Department of Education.

Please do not hesitate to contact me on 8076 5317 if you have any questions,

Yours faithfully,



James Phillips (Director)