

24 November 2016

File Number: 2016/617649  
Our Ref: R/2016/26/A

Cameron Sargent, Team Leader, Key Sites Assessments  
NSW Department of Planning and Environment  
Sydney NSW 2000

Attention: Ashley Cheong  
Email: [ashley.cheong@planning.nsw.gov.au](mailto:ashley.cheong@planning.nsw.gov.au)

Dear Ashley,

**State Significant Development 16\_7881 – Sydney Opera House Building  
Renewal Program - Function Centre and Related Works**

I refer to your correspondence dated 18 October 2016 inviting Council to make a submission regarding the State Significant Development Application SSD 7881 for a function centre and related works that form part of the Sydney Opera House Building Renewal Program.

The State Significant Development (SSD) application is seeking consent to expand and adapt the existing function centre. Key components of the works include the removal of the marquee on the northern 'broad walk', minor external alterations, and major internal alterations to expand the function centre - including the conversion of the existing ballet rehearsal room into a kitchen. The rehearsal room is proposed to be relocated on a temporary basis to an area presently used as a meeting room, approximately 150m to the south west of the current location, on the opposite side of the central passage.

The City has reviewed the information provided as part of the public exhibition. The City objects to the proposal on the following grounds:

- future opportunities to reinstate the original Harbourside restaurant complex will be permanently lost;
- the provision of additional function space is contrary to the Utzon Design Principles (UDPs);
- significant fabric will be permanently removed;
- the relocation of the ballet rehearsal room from beneath the Joan Sutherland Theatre (JST) has a significant and unacceptable heritage impact; and
- the proposed location of the ballet rehearsal room will have a negative impact on the primary function of the Opera House as a world class performing arts centre.

It should be noted that this submission refers to the hierarchy of levels of significance within the endorsed Conservation Management Plan - “*Sydney Opera House: A Revised Plan for the Conservation of the Sydney Opera House and its Site*” (3rd edition 2003) (CMP 2003).

The levels of significance identified in the CMP 2003 are as follows:

- (A) items of exceptional significance in a broad context;
- (B) items of considerable significance which would warrant inclusion on any national or state register of places of significance; and
- (C) items that reach the threshold for entry onto such registers.

### **Expansion of the function centre**

The proposed function centre is proposed to be expanded to occupy the whole of the northern frontage of the podium. The eastern part of this area originally accommodated the Harbourside restaurant complex, which is graded in the CMP 2003 as (B).

The formation of an enlarged function room is dependent upon the partial removal of the curved walls of the main corridor that are graded as (B). The extent of removal requires careful consideration as it is an irreversible change. An enlargement of the original opening in the western wall of the eastern podium is also proposed. In our opinion, this will diminish the drama of this elevation with its singular narrow opening, and is therefore not supportable.

Given these modifications are required to facilitate additional function space, this calls into question the suitability of the site to accommodate that expanded use.

In addition, the proposed expansion of the function centre and associated demolition works will prevent any future reinstatement of the original Harbourside restaurant. This is a loss to the community and to the significance of the place.

We note that Jørn Utzon cautioned against introducing additional functions into the Opera House beyond those for which it was designed; precisely the objective of this proposal. The UDPs provide important guidance on the intended role of particular spaces and elements and on how they should be treated in the future. Relevant to this application is the following principle:

### ***Danger in too many functions – building has limited size***

*“But the inherent danger in large buildings, which have become popular, is that there is a tendency to want to fill too many functions and rooms into those buildings.”*

Moreover:

*“It is not a good idea to fit more rooms inside the building... more functions than it can hold. (UDP page 50).*

The proposal is in clear violation of the UDPs and Utzon’s vision for the building.

We also note that the Statement of Heritage Impact (SOHI) does not describe the options considered for this space, and why they were discarded as per the NSW

Heritage Council Guidelines. The SOHI states that a public restaurant in this location has limited viability due to *'the availability of other food offerings in Circular Quay and along the Lower Concourse, whereas a function centre is viable here'*; however this is not a valid heritage consideration. In our view, the existence of the marquee since 2003 has inhibited and discouraged visitors to the northern 'broad walk'. If the area were to be reinvigorated by the removal of the marquee and the reinstatement of the outdoor seating area, this may improve the viability of a public restaurant or café.

In light of the above, the City is unable to support the expanded function centre as proposed. In particular:

- it is in direct contradiction with Jørn Utzon's vision for the Opera House;
- it will result in the removal of significant fabric; and
- it will diminish any future potential to re-establish the former restaurant.

The impacts are significant and unacceptable.

### **Relocation of the ballet rehearsal room**

In order to expand the function centre, it is proposed to convert the existing ballet rehearsal room into a kitchen. The rehearsal room is proposed to be relocated on a temporary basis to an area presently used as a meeting room, approximately 150m to the south west of the current location.

Jørn Utzon's concept was to group rehearsal and preparation spaces beneath their related auditorium, which resulted in four rehearsal rooms being located beneath the minor hall (now JST), and a much larger rehearsal hall beneath the major hall (now Concert Hall). This proposal removes the last remaining rehearsal room from beneath the JST, relocating it to a distant location on the other side of the central passage.

The removal of the existing ballet rehearsal room to an alternate location in order to accommodate the function centre kitchen is an adverse heritage impact. Worse, it prioritises the function centre use over of the performing arts. This is particularly unacceptable in consideration of Utzon's specific warning against expanding functions, and in the context of the Opera House's World Heritage Status as an architectural monument and world class state of the art performing arts centre. The authenticity of its primary use and function must not be diminished.

The proposed new location for the ballet rehearsal room is approximately two minutes' walk from the auditorium. It is also remote from the performers' dressing room and other facilities and requires performers to cross the central passage to access it. This arrangement is incompatible with the Opera House's status as a world class state of the art performing centre. While the application states this arrangement is temporary, there is no plan in place for a more suitable permanent location. Accordingly the Consent Authority must consider this arrangement as potentially permanent.

The SOHI identifies that the works to create the new ballet rehearsal room will impact fabric of 'little' significance. This is incorrect, as it will affect fabric and spaces graded as (C). In addition, the proposed openings for a door and window on the east

side will affect the central passage, which is ranked as (B). Accordingly the heritage impacts of this component of the proposal have been understated.

Notwithstanding the above, the salvage and re-use of the white birch moulded plywood 'wobbly' panels is supported.

### **Removal of the marquee and use of the outdoor area**

The CMP grades the marquee as being intrusive as it obscures the northern exterior of the podium. Its removal is consistent with the CMP Policy 11.1 and is therefore supported.

We note that the area is proposed to be used in conjunction with the adjacent function centre although through temporary and less intrusive measures such as umbrellas and demountable bollards. Relevant to this component of the proposal is the following principle:

### ***Keep the approach, the openness and fluidity of movement***

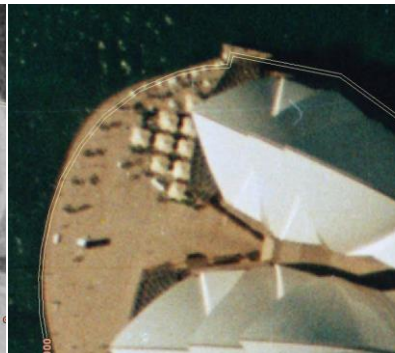
*"One of the great features of the Opera House is the approach, the openness, the fluidity of people's movements through the house, and once you clutter this you have a problem."* (UDP page 49)

The proposed outdoor area must be managed to ensure the retention of free public movement around the 'broad walk'.

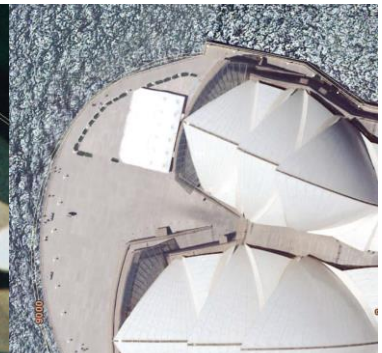
Below is a series of aerial images from 1973 to the present, which show how the outdoor eating area in the north-east corner of the 'broad walk' was activated for public outdoor seating between 1979 and 2003.



**Figure 1:** 1973-c1989 showing tables and chairs and planters associated with the cafe



**Figure 2:** c1989-2002 showing tables and chairs and umbrellas associated with the café



**Figure 3:** 2003-present showing marquee

The above images demonstrate how the original design intent has been diminished over the years. This application presents an opportunity to re-establish the north-eastern corner of the 'broad walk' for general public access and for free public use as an outdoor seating area. The City would be highly supportive of such a proposal.

If the Consent Authority was to consider granting development consent for the outdoor area for the proposed function centre, it is recommended that those uses should only be occasional and temporary. Access to the public should be maintained whenever the area is not in use. If the area was to be barricaded or privatised on

a more permanent basis, the fluidity of movement would be lost, contravening the UDPs.

Furthermore, the presentation of the 'broad walk' must be consistent with the CMP 2003:

*"In order to preserve the stark and dramatic presentation of the Opera House, the unnecessary should be resisted and the necessary kept to an absolute minimum"*

And with the CMP Policy 3.3:

*"Objects should only be permitted on the forecourt, lower forecourt sea wall path, broad walk, podium deck and steps if they do not interrupt or intrude upon the open and uncluttered character of the place, or if they are absolutely necessary for the safety of visitors."*

In this regard, further detail should be provided to demonstrate the suitability of the proposed outdoor furniture, including umbrellas and bollards, and any proposed mechanisms to affix these elements to the 'broad walk'.

### **Cumulative impacts**

The cumulative impact of the proposed alterations arising out of this application, combined with other recent and forthcoming applications relating to the 'Sydney Opera House Building Renewal Programme' need to be assessed as a whole. The division of this programme of works into discreet applications serves a practical purpose, however it does not permit a comprehensive overview and assessment of the final outcome. Accordingly there is a risk that the building's significance will be diminished by an accumulation of adverse impacts, that in isolation appear to be less consequential.

### **Documentation**

The CMP 2003 and the drawings appear to use differing descriptions for the levels of the building, making it difficult to cross reference. For example, it is assumed that Level +30 in the CMP 2003 is the Ground Floor Plan (+12) in the drawings.

If there is an inconsistency, it is recommended that the drawings be amended to use the same naming convention as the CMP 2003.

### **Third Party Consultation**

It is noted that minutes of discussions with, or advice from, the Eminent Architects Panel and Conservation Council have not been provided as part of this application. It is not known to what extent the project has their support.

If the project was to proceed in its current format, which we do not support, further design resolution and detailing on the project should be carried out in close consultation with the Opera House's heritage architect, Eminent Architects Panel, and Conservation Council. Any proposal should have their full support before development consent is granted.

Further consultation should also be conducted with other major stakeholders including the NSW Heritage Office and the City of Sydney. Design excellence and

adherence to the UDPs and the policies within the CMP 2003 should be paramount considerations.

### **Conclusion**

The City does not support the proposal in its current format and is unable to provide recommended conditions of consent.

The City recommends that the application be amended to address the above concerns, and we look forward to providing comments on the amended proposal.

Should you wish to speak with a Council officer about the above, please contact Christopher Ashworth, Senior Planner, on 9246 7757 or at [cashworth@cityofsydney.nsw.gov.au](mailto:cashworth@cityofsydney.nsw.gov.au).

Yours sincerely,

A handwritten signature in black ink, appearing to be 'GJahn', with a large loop at the end.

**Graham Jahn AM**  
**Director**

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