

3 September 2021

Jenny Chu
Planner
Department of Planning, Industry and Environment

By email: dasubmissions@cityofsydney.nsw.gov.au

ATTENTION: BILL MACKAY - Manager Planning Assessment

Dear Ms Chu,

National Trust submission relating to Fort Street Public School Mod 1 - Design and layout changes

The National Trust of Australia (NSW) expresses its strong objections to the major design changes to the Fort Street Public School project – a project which was originally approved by the Department of Planning, Industry and Environment on 7 October 2020.

The Trust has consistently supported the continuing use of the site as a school, and has, to date, been keen to work with the school community with whom we have enjoyed a long and fruitful relationship. The design as approved, while not necessarily the most sensitive heritage outcome for the place, was of a scale deemed appropriate for this very sensitive context in that it at least did not exceed the height of any other pre-existing structures. The proposed changes however make a mockery of the entire planning system, particularly with regard to heritage considerations and community input.

The National Trust do not agree that the proposed changes are “minor in nature or are indeed improvements to the design”¹, but are instead a major redesign with severe detrimental impacts to the setting of the National Trust Centre in particular.

The Trust object to:

- The addition of an additional storey to Building J
- The increased height and bulk of Building J, which directly fronts that National Trust Centre
- The description of the modification as “minor changes” when it involves changes to multiple building heights, forms, floor plans, cladding, roof designs, fences, colonnades (including changes to size, structure and material), mechanical plant, and installation of rainwater tanks.
-

Flawed Design Process

The architect claims that “since the original application, the details of the proposed expansion have been

¹ Executive Summary, FJMT Architectural Design Statement, Revision 4 (15/04/2021), p.5



subject to an increase in the amount of detail available to the project team.”² The National Trust queries why detailed expert input, cost analysis, and even the School infrastructure brief for the project would change *after* a design was put forward and not dealt with as part of the design process. The deletion of the lift from the MET building can be seen as a positive heritage outcome for that building itself, but it must be questioned why this was not considered earlier given the obvious constraints of inserting a lift in a historic building of dubious structural integrity, compared to incorporating a lift in a new building from the outset.

Over-Development of the Site

The SSDA Notice of Decision (7/10/2020) noted that “the proposal would be an over- development of the site” and “the proposed height being below the Meteorology Building is supported.”³ These are valid concerns and the Trust agree with such statements.

Instead of responding to this concern about the scale of the proposed development by reducing building height and bulk, the section 4.55 response has been to **add an additional storey on building J** and increase the envelope and height of that building compared to that shown in the approved SSDA. This proposal,

Visual Amenity

The National Trust has long held concerns over the adequacy and legitimacy of views analysis, particularly where it pertains to heritage. The Visual Impact Assessment (February 2021) by Ethos Urban is another example of why the Trust holds such concerns. The report states that the view from the National Trust Centre is of “Low” sensitivity, simply because it is from the carpark of the National Trust. It does not consider at all the historical importance of the site, and in no way makes reference to the impact on the main front view of one of the oldest public buildings in Australia. The document does however assess entirely meaningless views of the site from the Sydney Opera House!

The report concludes that the magnitude of the view is “high” but that “the magnitude is offset by **the low sensitivity of the viewpoint**, where it is used as a private carpark and no significant elements are present in the background. Therefore, the visual impact at this viewpoint is moderate.”⁴ To argue that the view immediately to the north from the National Trust Centre – an item on the State Heritage Register – is of low sensitivity in relation to this proposal, yet the view from the Sydney Opera House forecourt is “highly sensitive” makes a mockery of this analysis.

² *ibid*

³ Response to Conditions of Consent, FJMT Architectural Design Statement, Revision 4 (15/04/2021), p.7

⁴ Fort Street Public School | Visual Impact Assessment | February 2021, p.32



Viewpoint 3 (existing)



Viewpoint 3 (Modification)

Design in a Heritage Context

In the SSDA Notice of Decision (7/10/2020) "Council noted that the proposal should be sympathetic to the heritage items onsite, including the Fort Street Public School Building, the Meteorology Building and the Messenger's Cottage, the surrounding heritage items, including the Sydney Observatory and the National Trust Centre, and State and locally significant conservation areas." The National Trust agree with this statement.

It has already been noted that the initial approved SSDA scheme was an over-development of the site, and already had a negative heritage impact towards the National Trust Centre. The revised scheme presents a three storey blank wall to the National Trust Centre.



Parking and Traffic

One of the Trust's major initial concerns was with regard to traffic management on the site. The modified design, through its "Phase 1 (Day 1) existing shared path" design will exacerbate traffic management problems on the site by completely removing the ability to have a turning circle associated with the school entry. This will result in cars and delivery vehicles not familiar with the site (a very large number) having no opportunity to turn around, and thus **needing to reverse into an intersection which services the National Trust Centre and Sydney Observatory**. This is an unacceptable traffic management strategy. It is also unclear whether the modification, through such an adaptation, seeks to include the roadway and turning circle in the calculation relating to playground space.



The proposal removes the opportunity for cars to turn around. This will result in cars reversing into an intersection.

proposal for internal and external repair works to the buildings at 82/84 Dixon Street, Haymarket. I understand that an extension of the deadline for submissions to 31 January, 2020 was granted by Council's Mr Derek Smythe in view of the many interested people who may not have been aware of the development proposal and its impacts.

On 25 September, 2019 the Board of the National Trust resolved to place the **Former Kwong War Chong & Company Buildings**, at 82/84 Dixon Street, Haymarket on the National Trust Register. Sydney City Council was formally notified of this Listing. A copy of the National Trust Register Listing Report is attached.

This building is the subject of an Interim Heritage Order (NSW Government Gazette 22 March, 2019) and Sydney City Council proposes the property for listing on the State Heritage Register. The National Trust also understands that the Chinese Australian Historical Society is nominating the building for National Heritage Listing.



The works proposed have the potential to seriously impact upon the intact historic interiors which form a major part of the building's heritage significance. The Heritage Impact Statement which has been prepared to support the Development Application is hopelessly inadequate.

The National Trust is essentially in agreement with the position put by the Chinese Australian Historical Society Inc. on the development proposal. Extreme care needs to be taken with all the interior items in both properties and works are needed, nor should be undertaken until the heritage investigations are completed and a Conservation Management Plan is in place. The Council's Interim Heritage Order Recommended Management should inform any works on this site.

Yours sincerely,

David Burdon
Director, Conservation