

07 July 2022

Brent Devine
Director Social and Infrastructure Assessments, Planning and Assessment
Department of Planning and Environment,
Locked Bag 5022,
Parramatta NSW 2124

Dear Mr Devine,

SSD-19989744: SCEGGS Darlinghurst - Adaptive re-use of Wilkinson House

In April 2019, the National Trust of Australia (NSW) lodged a strong objection to the proposed demolition of the Emil Sodersten designed Gwydir Flats (Wilkinson House) at 165 Forbes Street, Darlinghurst, which formed part of the State Significant Development Proposal (SSD 8993) for the SCEGGS Darlinghurst Concept Development Application.

The entire SCEGGS site is within the **East Sydney / Darlinghurst Urban Conservation Area** listed on the National Trust Register in April, 1981.

Despite lodging an earlier submission against this proposal, we were unaware of the current proposal and have only just reviewed that documentation. We apologise for the lateness of this submission but feel it is important to respond.

Our initial submission argued that the Concept Design should be seriously re-thought with an emphasis on the recognition, better protection and conservation of the heritage of the site which is an important element of the broader heritage of the Darlinghurst area.

The Trust recognises that the revised proposal does retain elements of the original Gwydir Flats building, but there are a number of points which should be addressed:

- The Conservation Management Plan (CMP) by Urbis contains a number of inconsistencies and there are serious concerns regarding some of the statements contained within it. For example the statement (p.50) that the soffit of this c.1926 building “*featured laser-cut floral motifs*” is clearly factually incorrect, given that lasers were not invented until the 1960s.
- The CMP consistently states that “*Wilkinson House is consistent with the popular styles of this time period, and exemplifies many of the qualities of the Mediterranean and Georgian Revival styles*” and that this included ceramic roof tiles. Pages 17, 20, 50, 105, and 116 reinforce this, yet Policy 53 (p.172) states that “*The existing Marseille roof tiles to Wilkinson House are not original. The roof cladding may be replaced with new materials provided that they are in keeping with the character and overall materiality/ palette of the building.*” There is absolutely no evidence provided elsewhere in this report to support this claim that the roof tiles were not original.
- The claim is also inconsistent with the earlier Statement of Heritage Impact by TKD Architects (January 2019, p.27) that “*The only exterior change (to Gwydir Flats) was in November 1944 with the creation of a new door at the basement level, facing St Peters Street.*”
- There is insufficient justification for the Marseille terracotta roof tiles being graded as “*little*” significance (p.141) and their being replaced with copper. The use of tiles is a key element of the overall architectural style of the building, and should be retained.



Adaptive reuse?

The National Trust would agree with the City of Sydney quoting Commissioner O’Neill in *Cracknell & Lonergan Architects Pty Ltd v Council of the City of Sydney [2016] NSWLEC 1159* that “*adaptively re-using a building means coming to terms with the existing fabric, juggling the constraints and opportunities it presents and using the existing fabric to provide a stimulus for the re-interpretation of the building.*”

It is impossible to then understand how the Heritage Impact Statement (HIS) by Urbis can support the claim that this proposal is for “adaptive re-use” of the building, and their argument (p.55) that they have “*considered that the adaptive reuse of Wilkinson House has come to terms with the existing fabric, and has juggled the constraints and opportunities it presents with the existing fabric providing a stimulus for the re-interpretation of the building.*”

The revised proposal put forward for the Wilkinson House involves:

- the demolition of all internal fabric (excluding the small entrance hall at ground level);
- removal of 22 balconies and their infilling with new windows;
- the insertion of nine large new openings in the west elevation;
- infilling of six original windows;
- demolition and widening of the original lightwell;
- the demolition of the entire roof.

The National Trust acknowledge that the adaptive re-use of new buildings can sometimes require significant intervention, and that some degree of change is often acceptable to allow a future use. This would certainly have been the case for this project should this option have been genuinely explored.

In the opinion of the National Trust however, this proposal is not for the “adaptive re-use” of Wilkinson House. It is for retention of the façade only.

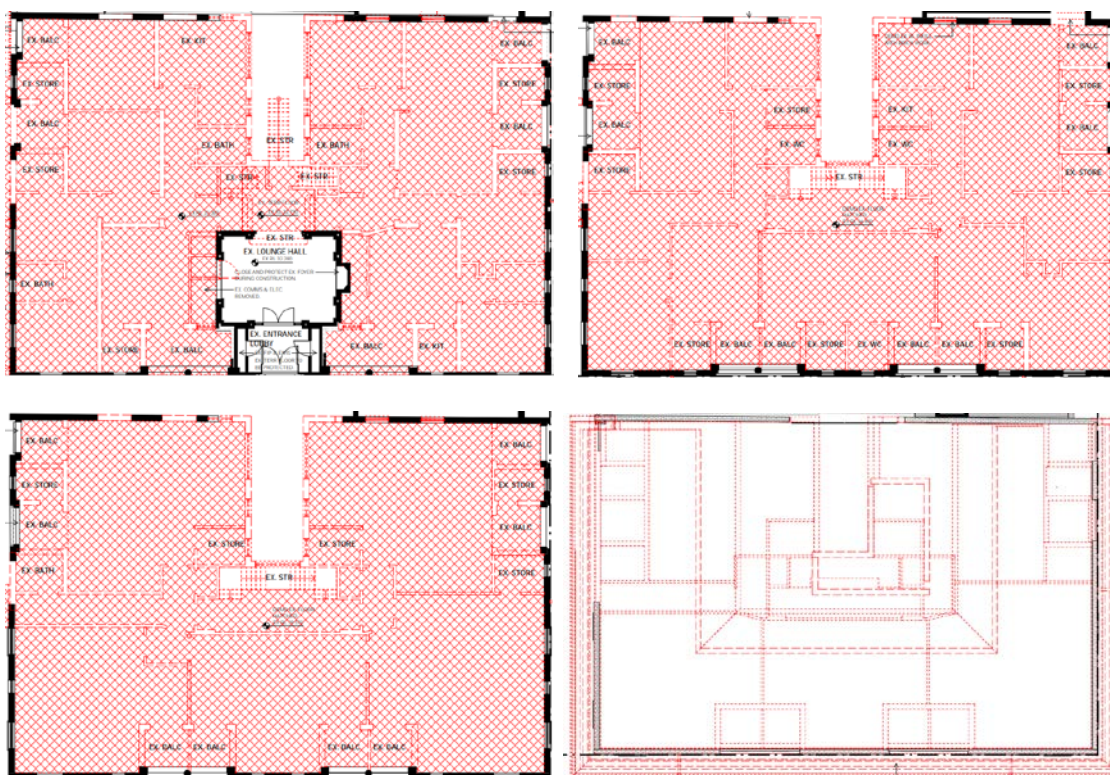


Fig. 1: Demolition Plans of ground, first, second and roof plans of Wilkinson House showing the complete and total demolition of all elements of the original building except for parts of the brick façade. (Source: Smart Design Studio)



Conclusion

In the November 2018 *Wilkinson House Options Analysis* prepared by TKD Architects for the SCEGGS Darlinghurst Stage 1 Detailed Design Proposal (SSD 893), three broad options were developed for redeveloping Wilkinson House in accordance with the School's requirements for flexible learning spaces:

- a) refurbishing of the building;
- b) redeveloping the building with the principal facades retained; and
- c) replacing Wilkinson House with a new building.

In their options analysis summary it was noted that *"From a heritage perspective, (Option B) maintains the building's contribution to the streetscape and conservation area through the retention of its principal facades. The streetscape and urban context of the building will remain largely unchanged. This option will result in the loss of the original internal fabric and plan form."*

Although perhaps not the best heritage outcome in terms of loss of original fabric, this was at the very least an honest appraisal of that particular option.

The current heritage impacts to the Wilkinson House building cannot be viewed in the context of "adaptive re-use", but instead as an option which retains the principle facades – although with the removal of the tiled roof this is not strictly the case either.

The National Trust are disappointed that this proposal has been promoted in this way, as it undermines all of the other significant (and often award winning) genuine, inventive, adaptive re-use projects which are occurring throughout NSW and which bring sustainable as well as heritage benefits from the re-use of old buildings.

We would argue that for this project to genuinely meet the agreed community perceptions of adaptive re-use, a far more inventive proposal is required which retains and responds to the existing fabric and plan of the Wilkinson House building.

Yours sincerely,

David Burdon
Conservation Director

Cc:

Shikha Jhaldiyal, Acting Manager Assessments, Heritage NSW

Marie Burge, A/Area Planning Manager, City of Sydney