



22 April 2020

Independent Planning Commission NSW  
Level 3  
201 Elizabeth Street  
Sydney NSW 2000

ipcn@ipcn.nsw.gov.au

Dear Madam/Sir

**Written Objection – SSD-8993- Concept and Stage 1 Development SCEGGS Darlinghurst**

Thank you for the opportunity to provide comment on the assessment undertaken by Planning NSW of the Masterplan developed by SCEGGS for its Darlinghurst campus.

I wish to lodge the following objections to the Planning NSW Assessment:

**Demolition of Wilkinson House**

I believe the assessment gives inadequate recognition of the building's significance in the wider development of residential apartment buildings in Sydney in the inter-war years.

Wilkinson House was the first building designed by Emil Sodersten following the establishment of his architecture practice in 1924. It was originally designed as a residential apartment building, and Sodersten went on to design some of the most significant residential flat buildings in Sydney's eastern suburbs. These include *Werrington* and *Cheddington* in Potts Point and *Birtley Towers* and *Marlborough Hall* in Elizabeth Bay.

Sodersten also designed some of the city's most significant office buildings of the inter-war years, including the City Mutual Life Building at the corner of Hunter and Bligh Streets and the QBE Building at 80 Pitt Street. The highly significant 7 Elizabeth Street apartment building, designed in conjunction with Marion Hall-Best has recently been lost to make way for the Sydney Metro project.

It would be a tragedy to demolish the first building designed by an architect who made such a significant contribution to the architecture of Sydney in the inter-war period.

A condition of consent should require the adaptive re-use of the Wilkinson Building.

I note that the Royal Australian Institute of Architects recognises the significance of the work of Emil Sodersten through the annual award of the *Emil Sodersten Prize for Interior Architecture*.

The Planning NSW assessment does not give adequate recognition of the building in the context of other adjacent developments which took place in the mid 1920's. The widening of William Street at this time led to the construction of a series of buildings on the southern side of the street, which remain intact and are recognised as having heritage significance. Wilkinson House is located immediately behind this collection of buildings, and should be preserved as part of this inter-war heritage townscape.

The site forms part of the City of Sydney's East Sydney Special Character and Conservation Area, and Wilkinson House acts as a 'cornerstone' at the northern end of this precinct.

The adjacent William Street buildings form part of the East Sydney Heritage Conservation Area designated by Environment NSW. The precinct is listed on the State Heritage Register. Its Statement of Significance notes:

*The East Sydney Conservation Area has historic and aesthetic significance for its ability to demonstrate the development of an inner city suburb during the mid to late nineteenth century, with later overlay. ....development related to institutions as well as residential flat development during the inter-war period (c.1919-1940) is also demonstrated.*

The Environment NSW assessment notes the significance of buildings such as Grenville House and the Chard Building, both in close proximity to Wilkinson House.

The Planning NSW assessment does not give adequate consideration of possible alternate uses for Wilkinson House. SCEGGS claims the building is no longer 'fit for purpose' and does not satisfy contemporary learning requirements. There is little evidence to suggest that options for alternate future use of the building have been adequately explored.

The Masterplan includes the redevelopment of the school's administration building as Stage 2 of the Masterplan's implementation. The new building is proposed for a site adjacent the historic Barham House, facing Forbes Street. The option for this building to be designed to satisfy contemporary learning requirements, and for Wilkinson House to be adapted to meet the school's administration and other facilities requirements has not been adequately addressed.

The current GFA provided by Wilkinson House is 1,161.9sq metres. The GFA of the proposed administration building is 821sq metres. A refurbished Wilkinson House could meet the future administration requirements of the school, whilst a reconfigured administration building could provide fit for purpose education spaces, albeit on a slightly smaller scale than currently achieved at Wilkinson House. The contemporary use of 821sq metres for contemporary learning could deliver efficiencies not currently available in the 1.160sq metre learning environment of Wilkinson House

This outcome could be achieved by an adjustment to the Masterplan's staging, providing for the current Stage 2 to precede the current proposed Stage 1 works.

A condition of consent should require adaptation of Wilkinson House for school administration, and the current proposed administration building reconfigured for learning. This will require a re-staging of the proposed works.

### **Traffic Management**

The Traffic Management study commissioned by SCEGGS monitored traffic flows at key intersections. It failed to give due recognition to the impact of traffic at peak school drop off and collection times at the lower end of Forbes Street, and opposite the Horizon apartments. Vehicles are consistently backed up and double parked, and the situation compounded when large buses – often two or three at a time, and on occasions double parked – coincide with these peak traffic periods.

Despite claims made by SCEGGS, there is no active, consistent and effective management of traffic at peak drop off and collection times. The SCEGGS staff presence is limited to a warden controlling student movements at a pedestrian crossing.

A condition of consent should require SCEGG to provide a permanent traffic controller at the Forbes Street entrance over school drop off and collection times.

A condition of consent should require SCEGGS to schedule bus collection and drop off times to ensure that only one bus at any time parks at the lower end of Forbes Street to collect and return students from physical education programs.

The Planning NSW assessment, nor the SCEGGS engaged traffic management study make no mention of the highly unusual current arrangement which has ceded control of St Peters Street between Forbes and Bourke Streets to the school. SCEGGS only permits vehicular access during school drop off and collection times. It remains closed at nights, weekends and school holidays, requiring vehicles to u-turn in Forbes Street and exacerbate traffic in this narrow suburban street. A requirement of the development consent should include the return of St Peters Street for public access at all times.

A condition of consent should require SCEGGS to provide vehicular access to St Peters Street at all times.

The Traffic Management study does not factor in the impact of additional traffic movements that will result from the proposed 45 place childcare centre. It can be assumed the majority of parents using this centre will travel by car, with the added requirement to park and take their child into the centre.

The provision of a child care centre should not be included in the consent for the Concept Masterplan.

It cannot be claimed that the implementation of the Masterplan will not lead to an increase in vehicle movements. Whilst the school claims the Masterplan will not result in an increase in student numbers, the presence of a childcare centre will indeed lead to an increase, and the school has within its discretion to increase student numbers by up to 10 percent above the current 950 places.

It is difficult to imagine the school embarking on a development of the scale proposed, without the potential to achieve a satisfactory return on investment.

### **Design Excellence**

The assessment undertaken by Planning NSW provides no details of the Capital Investment Study (CIV) commissioned by the department, nor the alternative and significantly reduced CIV provided by SCEGGS.

Given the discrepancy in the figures, and the lack of evidence provided to demonstrate independence and transparency in this assessment, it is a matter of concern that the revised CIV figure now sits just below the \$50 million requirement for a Competitive Design Excellence process to be undertaken.

If the demolition of Wilkinson House is to proceed, the importance of design excellence on this prominent, corner position of the East Sydney Special Character and Conservation Area is even more critical.

If Stage 1 of the Masterplan is approved, a condition of consent should require SCEGGS to undertake a competitive design excellence process.

Finally, I commend the commitment to restore the highly significant John Verge designed *Barham*, one of the last remaining mansions built as the result of land grants made to wealthy and influential members of the colony in the 1830's.

I appreciate your consideration of the objections to the SCEGGS Masterplan, and I look forward to their independent consideration by the Panel.

Yours sincerely

Peter Morton