

Attachment B5

**Summary of Submissions –
Town Hall House**

Summary of submissions
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E	Town Hall House, 456 Kent Street, Sydney		
E1	Urbis for landowner	Support and seek reduced listing. Urbis supports the City Projects and Property submission conclusion that the heritage listing be amended to exclude the majority of the internal fabric components, as outlined below.	Support noted and comments responded to below.
E1	Urbis for landowner	<p><u>Significance grading and conservation management plan</u> Urbis reviewed the Conservation Management Plan of 25 August 2016 prepared by Robertson & Hindmarsh Pty Ltd. Urbis questions the grading of exceptional significance attributed to elements of: ribbed vinyl wallpaper, sloped bulkhead and columns, perforated metal acoustic pan suspended ceiling, unperforated metal pan ceilings and egg crate diffuser luminaires (in WCs), egg-crate diffuser type of luminaires, in-line air conditioning ducts; original toilet facilities, recessed ceramic drinking fountains. Whilst these internal finishes and elements are original, in some cases they have been modified. It is debatable that they reach the threshold for grading as exceptional significance. Many of the internal finishes and elements do not compare with exceptional values given to a number of external building elements. Exceptional significance is defined in the CMP as “rare or outstanding element directly contributing to an item’s Local and State significance”. Very few internal elements are assessed as high significance defined as “high degree of original fabric. Demonstrates a key element of the item’s significance. Alterations do not detract from significance”. Elements of exceptional and high significance are treated the same as: “conserve significant fabric with minor alterations to permit continued use as intended. Upgrading to meet code requirements needs careful consideration to ensure that the design intention is retained.” This presents considerable restriction for change. The listing of internal finishes as exceptional will restrict future development within the building. The plan identifies that change is inevitable, but this is restricted by grading internal finishes as exceptional.</p>	<p><u>Significance grading and conservation management plan</u> City staff considered the submitted information, the contested conservation management plan assessment and inspected the building in order to review the extent of listing in accordance with the Heritage Office guide for assessing significance and directions contained in the Standard Instrument (Local Environmental Plans) Order 2006. This order requires the item name to briefly describe significant features including interiors. An item name does not specify a hierarchy of significance; only what is listed as significant. The disputed exceptional significance of components is noted and provided assessment of significance of these features reviewed below. Components of moderate, high or exceptional significance all meet the Heritage Office guidelines for local or state heritage listing. This includes altered original elements that demonstrate a key element of or contribute to the overall significance of the item.</p> <p>Listing interior features does not require retention or direct the form of future development but ensures impacts on significant features are assessed. It is most appropriate to consider and address operational or management issues at the development application stage when a detailed proposal is prepared. The non-prescriptive development assessment process for heritage items enables the form of development to be determined in response to the individual building features and circumstances, while also retaining significance. The views and issues of owners and their consultants are considered through this process.</p> <p>The management recommendations and other information in the inventory provide guidance to landowners on conserving the building's significance. The inventory recommendations for a heritage impact statement and consideration of the 2016 conservation management plan for works affecting listed building features are appropriate. This non-statutory supporting information can continue to be updated, before or after listing, as new information becomes available, such as through review of the conservation management plan.</p>

¹ Submitters are named with permission from the submitter

No.	Submitter ¹	Submission summary	Submission response
E1	Urbis for landowner	<p><u>Ribbed vinyl wallpaper</u> This original finish was selected by the architects as a proprietary item to conceal the uneven surfaces of the off-form concrete walls. It has been altered with painting of the original unpainted surfaces, due to deterioration. This is not recognised in the conservation management plan assessment and grading. Council does not have a supply of the original wallpaper and in the event of the degradation of the vinyl wallpaper, an alternative wallpaper replacement or finish would be required. The plan acknowledges that the building will change for functional requirements, changes in work practices and staff amenities. “It is acknowledged that change will continue to occur, but it is the way that such change is managed that is critical to retain those remaining elements of the building that made it such a special building at the time of its construction.” It is likely the raw concrete surface will remain covered to conceal the uneven surface. It seems possible the ribbed vinyl wallpaper of itself is not so exceptional in its heritage significance that a suitable replacement may need to be considered in the future.</p>	<p><u>Ribbed vinyl wallpaper</u> It is accepted this feature may not meet the Heritage Office definition of exceptional significance as a rare or outstanding element directly contributing to the item's local or state significance, while noting that components of high or moderate significance still meet the Heritage Office threshold for listing. As an applied finish with limited technical or aesthetic merit and shorter lifespan than building materials, it is accepted that this element does not warrant individual identification in the item name, except where fixed to other listed building components. It is noted that the 2019 conservation management plan generally recommends retention of ribbed wallpaper finish to the external walls and bulkheads, as opposed to all remnants. The external walls and bulkheads components recommended for inclusion in the listing.</p> <p>Listing interior features does not require retention or direct the form of future development but ensures impacts on significant features are assessed through the development application process. Minor alterations to listed building components can be achieved through the notification process for ‘heritage works without consent’.</p>

No.	Submitter ¹	Submission summary	Submission response
E1	Urbis for landowner	<p><u>Suspended metal pan ceilings</u> The conservation management plan notes there are no more original perforated metal ceiling panels. These survive on levels 5-10, 11-17 and 19-22. The grid pattern reflect the design of the interior of the building. However, the imperial measurements make it difficult to find replacements. The grading of “exceptional” significance is perhaps an overstatement. The perforated ceiling tiles represent both a WHS risk and an onerous cost, requiring frequent inspections to ensure that they remain in place. Tiles have sporadically fallen from the ceiling. This has potential to cause serious injury and risk. A further complication is the City cannot upgrade the interrelated lighting and air conditioning system cost effectively with the imperial ceiling system in place. The exceptional grading of metal ceilings in the bathrooms seem overstated and limits the potential for future change. Numerous egg-crate luminaires have been upgraded or replaced with higher efficiency tubes throughout the building. Urbis believe alternative luminaires could be used in remaining levels. Significant internal features include the timber suspended ceiling with timber triangular prisms on Level 4. This ceiling finish can be readily understood to be have exceptional significance and worthy of retention and conservation.</p>	<p><u>Suspended metal pan ceilings</u> Support the exceptional significance of the level 4 timber ceilings. It is accepted the perforated metal suspended ceiling system, including integrated luminaries and air conditioning ducts, may not meet the Heritage Office definition of exceptional significance as a rare or outstanding element directly contributing to the item's local or state significance. They are more likely to be of high or moderate significance. The ceilings are an original building feature of some technical and historic value, as described in the conservation management plan.</p> <p>It is understood that it is not possible to upgrade or repair these trays to ensure their safety. Replacements trays in metric measurement would not have the same degree of historic or technical significance or reference to the original floor plan. While acknowledging the significance of this perforated metal ceiling system, it is accepted that this metal ceiling feature is not capable of conservation or substitution in a way that retains its significance. Therefore, only the timber ceilings of level 4 are included in the revised item name. It is recommended that the owner seeks advice on appropriate recording or sample retention of these metal ceilings, to document this aspect of its history. This could be informed by the existing or an update to a conservation management plan.</p>
E1	Urbis for landowner	<p><u>Bathrooms and drinking fountains</u> Regarding the toilet facilities, the conservation plan identifies that change is possible providing it is sympathetic. The plan identifies that original toilet facilities on level 4 need to be renovated. In the event of deterioration, replacement would seem inevitable. Assessing the finish as exceptional, seems impractical and limits potential maintenance and upgrade works.</p> <p>Four original Fowler recessed ceramic drinking fountains survive in the lift lobbies of levels 5, 9, 10 and 11. These are assessed as having “exceptional” significance. Some of the drinking fountains are out of service. The conservation management plan recommends they be retained in situ, “refurbished” and retrofitted to enable a mechanism to fill water bottles. Whilst the drinking fountain is original fabric and a representative feature of a 1970s office building, the grading of “exceptional” significance seems to be overstated. Consideration should be given to the potential removal of the four drinking fountains.</p>	<p><u>Bathrooms and drinking fountains</u> On review of the conservation management plan, only the level 4 bathrooms are identified as retaining original configuration, some fixtures and fittings. This plan also recognises their need for refurbishment. The other bathrooms have generally been substantially altered. It is accepted that apart from the more original example at level 4, the bathrooms are not as significant as other building interiors. The drinking fountains in the lobbies of three levels (none noted in the conservation management plan for level 10) are original features, with a recommendation in the conservation management plan for reconnection. It is reasonable to include these as significant internal features. The submission and City review of the contested plan has not provided substantive new information to dispute the assessed significance of the drinking fountains.</p> <p>Listing interior features does not require retention or direct the form of future development but ensures impacts on significant features are assessed through the development application process. It is most appropriate to consider proposals for removal of significant features at the development application stage when a detailed proposal is prepared.</p>

No.	Submitter ¹	Submission summary	Submission response
E1	Urbis for landowner (18/2/20, 24/4/20)	<p><u>Commercial tenants, upgrades and sustainability</u> As workplace arrangements change, future levels of this building could be leased out as office space to commercial tenants. This needs flexibility in internal spaces and finishes to allow for new fit-outs. The proposed listing of internal fabric and finishes and grading as exceptional significance would constrain the ability for upgrades and future development of the internal office spaces.</p> <p>Consideration should be given to introducing guidelines and exemptions to allow change to elements that are not performing and will otherwise result in material degradation. This includes the maintenance issues associated with leaking windows identified as having exceptional significance.</p> <p>Council has a commitment to environmental sustainability targets. These aims is to reduce our carbon emissions through green infrastructure to reduce energy, water and waste-water demands. Council has made a commitment to showcase innovative solutions to deliver outstanding environmental performance. Council has pledged to work to raise environmental standards across all sectors of the built environment. This may require retrofitting high water-using properties with water efficient fixtures and fittings. This will result in some change in office spaces, including finishes and fixtures.</p>	<p><u>Commercial tenants and upgrades</u> As a result of the post-exhibition City review, including consideration of these submissions, the listing has been revised to specify significant features in the item name, and the inventory updated. This excludes non-structural office floors, parts of other floors and the basement carpark from the listing. The proposal is amended to enable complying development fit-outs of excluded components. As a result, the development process will be unchanged for most commercial fit-outs. Common tenancy fit-outs or minor repairs affecting listed building features can be achieved through the quick low-cost notification process for 'heritage works without consent', without the need for a development application.</p> <p>Listed buildings can still be repaired and upgraded to meet current standards, improve environmental performance and reduce carbon emissions. Listing interior features does not require retention or direct the form of future development but ensures impacts on significant features are assessed through the development application process.</p> <p>The 2016 conservation management plan provides guidance on upgrades and repairs. Its main recommendations are included in the inventory. This plan can be reviewed to consider changing operational requirements. As non-statutory supporting information, the conservation management plan and inventory do not limit building changes that can be proposed and assessed. Proponents are encouraged to arrange pre-application meetings with City planners to gain greater certainty about development plans.</p>

No.	Submitter ¹	Submission summary	Submission response
E1	Urbis for landowner	<p><u>Conclusions</u> Urbis questions the grading of exceptional significance attributed to each of the internal elements of: ribbed vinyl wallpaper, sloped bulkhead and columns, perforated metal acoustic pan suspended ceiling, unperforated metal pan ceilings and egg crate diffuser luminaires (in WCs), egg-crate diffuser type of luminaires, in-line air conditioning ducts; original toilet facilities, recessed ceramic drinking fountains. Recommend listing for the above-mentioned internal elements be removed from the heritage nomination to allow for greater flexibility and the ongoing viability of the building.</p>	<p><u>Conclusions</u> The building is assessed as state significant as a fine example of the commercial work of the influential architect, Ken Woolley (1933-2015), demonstrating the influence of the Brutalist style, sophisticated use of load-bearing precast concrete, with significant interiors. The 2016 conservation management plan identifies significant original internal fabric in the level 1 and 2 foyers, level 4 and levels 5-23 office levels, as embodying the original design intent based on detailed research and assessment, including an interview with Ken Woolley. City staff considered the submitted information, the contested plan assessment and inspected the building in order to review the extent of listing in accordance with the Heritage Office guide and state policy directions. While it is accepted the disputed internal features may not meet the Heritage Office definition of exceptional significance as directly contributing to the item's significance to the degree of external elements, a number of internal components likely meet the Heritage Office threshold for listing as of high or moderate significance. The submission and City review of the contested plan has not provided substantive new information to dispute the assessed significance of the drinking fountains. It is accepted that the wallpaper finishes to unlisted building elements, metal ceilings and non-original bathrooms are less significant or incapable of conservation. As a result of the post-exhibition review, the proposed item name for "significant interiors and artworks" has been revised to specify these as identified in the significance assessments, confirmed by City review. These are specified as " facade walls and fixtures, structural interiors, level 1 paving and foundation stone, curved stair to level 2, interiors of level 2 southern foyer, levels 4 and 6 links to Sydney Town Hall, level 4 function rooms, foyers, bathrooms and terraces, levels 5-23 bulkheads, levels 5, 9 and 11 lobby drinking fountains, and Marconi sculpture." This excludes non-structural office floors, parts of other floors and the basement carpark from the listing. The inventory has been updated to reflect this post-exhibition review. Listing interior features does not require retention or direct the form of future development but ensures impacts on significant features are assessed through the development application process.</p>
E2	City Projects and Property, City of Sydney	Support and seek reduced listing. As outlined below.	Support noted and comments responded to below.

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E2	City Projects and Property, City of Sydney (19/9/19)	<p><u>Interiors listing</u> City Projects and Property acknowledges the significance and contribution that Town Hall House to the City as a representation of Modern Movement architecture. However, the current form of the proposed listing will impact the building's functionality and will need to be sensitively modified. The listing of many elements of the internal building fabric constrains the City's ability to continue to upgrade the building. By listing the internal fabric, much of which has been removed or significantly altered, it will generally make it more restrictive to undertake works, adding additional requirements for documentation and processes to obtain a development consent for minor works to heritage items. Support listing the exterior and internal elements of level 1 cast concrete foundation stone, level 2 coffered ceiling to entry, level 3 council offices view from staff lunchroom into foyer, level 4 diagonal boarded ceilings (some composed of triangular prisms), link to Town Hall and service lift.</p> <p>In order to maintain the buildings functionality, reduce operating costs, and improve environmental performance, it is recommended the listing excludes the majority of internal fabric, other than the above over levels 1 to 4. It is also requested that the listing is worded in a way so exempt and complying development for internal works can continue to be undertaken.</p>	<p><u>Interiors listing</u> As a result of the post-exhibition City review, the extent of the listing in the item name has been revised to identify significant features as identified in the significance assessments and capable of conservation, confirmed by City review. This includes parts of levels 1-4, and facade walls, fixtures, bulkheads and 3 drinking fountains of office levels 5-23. The revised item name provides greater clarity about listed significant interiors, which are identified in more detail in the supporting updated inventory. The revised item name excludes non-structural office floors, parts of other floors and the basement carpark from the listing. The proposal is further amended to enable complying development fit-outs of excluded components. As a result, the development process will be unchanged for most commercial fit-outs. Common tenancy fit-outs or minor repairs affecting listed building features can be achieved through the quick low-cost notification process for 'heritage works without consent'.</p> <p>Listed buildings can still be repaired and upgraded to meet current standards, improve environmental performance and reduce carbon emissions. Listing interior features does not require retention or direct the form of future development but ensures impacts on significant features are assessed. The non-prescriptive development assessment process for heritage items provides the opportunity to consider and address building and development issues for the individual building circumstances in a way that respects significant building features. The views and issues of owners, tenants and their consultants are considered through this process.</p>
E2	City Projects and Property, City of Sydney (19/9/19)	<p><u>Ceiling tiles and light fittings</u> Listing further features may inhibit upgrades to contemporary standards, including Council's key sustainability objectives such as improving the building's NABERS rating. For example, the ceiling tiles and light fittings are in imperial measurements and are no longer manufactured. These constrain the implementation of new energy efficient lighting and air conditioning measures.</p>	<p><u>Ceiling tiles and light fittings</u> The significance of these features are outlined above in response to the Urbis submission. While acknowledging the significance of this metal ceiling system, it is accepted that this metal ceiling feature is not capable of conservation or substitution in a way that retains its significance. Therefore, only the timber ceilings of level 4 are included in the revised item name. It is recommended that Properties seek advice on appropriate recording or sample retention of these metal ceilings, to document this aspect of its history. This could be informed by the existing or an update to a conservation management plan.</p>

No.	Submitter ¹	Submission summary	Submission response
E2	City Projects and Property, City of Sydney (19/9/19)	<p><u>Altered stair, glazed walls and wallpaper</u> Some internal elements are no longer in place or have recently been rebuilt, such as the curved stairway between Levels 1 and 2. The Armour plated glazed walls and doors have been removed. Additionally, the ribbed wallpaper deteriorated quickly, and painting became the only option, over time some areas have deteriorated further.</p>	<p><u>Altered stair, glazed walls and wallpaper</u> The alterations to the curved stair are acknowledged in the conservation management plan. While altered, the conservation management plan identifies this feature as a significant element in the design of the building, "giving it an Expressionist aesthetic not found on many buildings in Australia". The original configuration and design intent can still be appreciated. The revised item name does not individually identify the Armour plated glazed walls, though does include level 4 interiors where these are located. The heritage submission for the landowner does not provide any additional assessment on the significance of the stair or glazing or recommend their exclusion.</p> <p>As noted above in the response to the Urbis submission, it is accepted the wallpaper does not warrant individual identification in the item name, except where fixed to other listed building components.</p>
E3	Anonymous	Support. It has character.	Support noted.
A2	Docomomo Australia Inc	<p>Support. This significant building is by one of Sydney Modernism's most talented and productive architects. Its relationship to and referencing of the nineteenth century Town Hall is an excellent solution to designing a Modernist building in an existing context whilst respecting the earlier buildings of Town Hall and St Andrews Cathedral. The relationship to the physical context of traditional Sydney is also an important part of Ken Woolley's design. The dark grey paving around the building and along the public footpaths mask the original design concept of a sandstone-coloured precinct which expressed the traditional materials of Sydney. Declares interest that the submission author was one of the authors of the Robertson & Hindmarsh 2016 Conservation Management Plan for the building.</p>	Support noted. Development beyond this building currently proposed for listing will need to consider impacts on the significance of this building and adjoining heritage items of Sydney Square and Sydney Town Hall.
A15	Glenn A Harper	<p>Support. Together with the Sydney Masonic Centre, this is an outstanding and rare brutalist period building. Each were impeccably built displaying a high degree of technical achievement. Both have a landmark quality.</p>	Support noted.