



Your heritage partners

08 December 2021

Ben Grant
Council Planner
Byron Shire Council
PO Box 219 Mullumbimby
NSW 2482

Email to: council@byron.nsw.gov.au

Dear Ben,

Re: Heritage Response to RFI – Upgrade of Bangalow Public School, 45 Byron St, Bangalow NSW

Australian Heritage Specialists Pty Ltd (AHS) are pleased to provide you with the following information regarding the Request for Further Information (RFI) for Bangalow Public School (DA No. 10.2021.450.1).

Background

Bangalow Public School is listed as an item of heritage significance under Schedule 5 of the *Byron Local Environmental Plan (LEP) 2014* and is also located within the *Bangalow Heritage Conservation Area*. The school is representative of formal education in Bangalow from 1884 and has special associations with early settler Robert Campbell who owned the land that was acquired by the Government for the establishment of the school.

AHS were recently commissioned by FKG Group to prepare a Heritage Impact Statement (HIS – also referred to as a Statement of Heritage Impact [SOHI]) which assessed the potential impacts to significant heritage elements or features that would be undertaken during the proposed upgrades to the Bangalow Public School. The proposed upgrades generally included the internal refurbishment of Block A (the early 1925 school building), demolition of existing demountable structures, upgrades to non-heritage significant buildings, and the construction of a new teaching building located centrally within the school.

The HIS report was prepared in accordance with the guidelines and principles outlined in the *Australian ICOMOS Burra Charter 1999* (Burra Charter) and the *NSW Assessing Heritage Significance Manual 2001*, as well as in accordance with the *Byron Local Environmental Plan (LEP) 2014*, the *NSW Heritage Act 1977* (Heritage Act), and the *NSW Environmental Planning and Assessment Act 1979*.

The HIS report generally concluded that the proposed works were acceptable from a heritage perspective, and utilised best practice techniques and Burra Charter initiatives to mitigate or minimise impacts to significant heritage fabric where necessary, ensuring the proposed activities were acceptable from a heritage perspective, as they do not propose any detrimental impacts upon the heritage significance of the place. Furthermore, the proposed works are necessary to ensure the ongoing operational use of the school, which is also an integral component of the school's heritage significance as the school must continue to operate in its historical use and context.



The DA Application (DA No. 10.2021.450.1), including HIS report, has recently been reviewed by both Clarence Heritage for Byron Shire Council, and by Byron Shire Council.

A Request for Further Information (RFI) was issued by Byron Shire Council on 19 November 2021 which detailed some concerns surrounding the impacts to Block A and the construction of the new teaching building. A meeting was undertaken with Council officers on 29 November 2021 to discuss the RFI further.

Please see over for Table 1: Response to RFI provided by AHS, in response to the RFI abovementioned.
For a full history and breakdown of significant elements, please see the HIS report (AHS 2021).



Request for Further Information

The following table (Table 1) outlines the matters brought forward in Council’s RFI regarding heritage concerns and AHS’s response to these matters.

Note: There are RFI items regarding non-heritage elements (i.e., proximity to sewer pipeline) which have not been addressed here.

Table 1: Response to RFI

RFI	AHS Response
Byron Council RFI – 19/11/21	
<p><u>1. Impact on Heritage Significance</u></p> <p>Council’s Heritage Advisor has concluded that the proposed development is likely to have an adverse impact on the aesthetic and historical significance of the original 1925 classroom building and the Bangalow Heritage Conservation Area.</p> <p>The following three key issues were identified:</p> <p>A. The southern elevation of the new teaching building introduces design elements such as projecting windows with square proportions and dark metal cladding which depart from the established character, built form, materials and colour palette of the historic school and the Bangalow Heritage Conservation Area context.</p>	<p>AHS disagree with this view that the new teaching building will have a negative impact upon the existing 1925 Building (Block A) or the Bangalow Heritage Conservation Area.</p> <p>As exhibited by photo montages (see below), the new teaching building has been sensitively located within the school site and is appropriately set back from the 1925 building, therefore ensuring that it does not overshadow or dwarf the early building in any way, noting also that it proposes to demolish current buildings which are intrusive to the site currently, such as ‘demountable’ buildings and replacing them with an architectural designed building which is well suited to the continued use and function of the school in an appropriate idiom</p> <p>Prominent visual setting aspects (views and vistas) to the 1925 school building have been maintained and is not impacted by the proposed new building, nor does the new building diminish the context of Block A in relation to the Byron Street streetscape or Bangalow Heritage Conservation Area. The new building is also softened from the Byron Street viewshed by trees and surrounding vegetation.</p> <p>New additions to, or within the vicinity of, heritage assets should be identifiable as such and not aim to ‘mimic’ or replicate heritage features and elements. NSW Heritage <i>State Heritage Asset Management Guidelines</i> expresses that ‘new additions are to include contemporary design elements and materials as appropriate, as well as being sympathetic to identified heritage values. Designs should be executed with appropriate materials and finishes.’ This ethos stems from principles and objectives expressed within the Burra Charter.</p> <p>It is AHS’s view that the new teaching building meets these conservation objectives as the new building follows a similar form, rhythm, and some material aspects of the 1925 building (being long and rectangular in length, a similar height, and utilising face brickwork).</p> <p>According to the Byron Shire Development Control Plan (DCP) for Bangalow, the objectives of the DCP are ‘to maintain and enhance the unique character and amenity of Bangalow as a rural township with strong historical linkages and heritage values; and to encourage new development to complement that special character to support and strengthen the historical context, heritage values, living amenity, and tourist potential of the town.’</p> <p>The DCP says to ‘complement’ not ‘mimic’ special character. Therefore, the use of face-brick on the new teaching building, as well as following a similar form and volume as the 1925 building, meets these objectives.</p>



RFI	AHS Response
1A (cont.)	<p>Furthermore, the DCP also discusses supporting and strengthening ‘historical context’ and ‘living amenity’. Ensuring that the Bangalow Public School has compliant and effective teaching spaces that meets modern codes and future educational requirements is also important and will ensure that the school continues to operate within its historical context (i.e., as a school) into the future and provide additional amenity to the Bangalow community (i.e., providing families and students with quality educational facilities) for years to come.</p> <p>The ‘mimicking’ of historic building fabric is simply not appropriate in this instance. The selection of an appropriate set back, form, and scale of the ‘fit for purpose’ new building must be the key ambition for a development of this nature from a heritage perspective. This approach ensures the cultural significance of the place is appropriately managed, including continued use of the site as a functional school for future generations.</p> <p>In regard to the projecting windows, square proportions, and dark metal cladding:</p> <ul style="list-style-type: none"> • It has been recently discussed that the colouring of the roof initially appeared darker than the specified product in the submitted package of drawings, which is a Shale Grey colouring (please see montages and sample material board below). The Shale Grey product/colouring is regarded as acceptable as it is a non-bright colouring that blends seamlessly into the background and with the surrounding school buildings – consistent with Corrugated Iron and avoids competing with the terracotta roof detailing of the 1925 building (making the new building less dominant along with its substantial setback). • Due to the set back from the 1925 building, the square proportions and projecting windows of the new building will not detract from any heritage features. The new building will sit within other square and rectangular shaped buildings, which form the historical evolution of the school and respect the early form. Furthermore, the rectangular form of the new building is in keeping with the 1925 building and the roof follows a similar/compatible pitch with neighbouring roofs. The projecting windows are square or rectangular in shape, which matches the rectangular shape of existing windows around the school. <p>Furthermore, the existing demountable buildings are much closer to the 1925 heritage building than what the new building would be. With the new building further set back than currently buildings, this is regarded as a positive outcome. As such, we disagree that the new development will have an adverse impact on the aesthetic and historical significance of the original 1925 classroom building and the Bangalow Heritage Conservation Area.</p>



RFI	AHS Response
<p>B. The proposed internal alterations to the historic 1925 classroom building are likely to diminish the legibility of the original four-classroom layout and could disturb the historic fabric of the building. It is noted that the new bathroom in the centre of the building will have a permanent impact on the original classroom space making this potentially difficult to reverse in comparison to office spaces. It is further noted that the plans submitted with the application differ from those assessed in the SOHI.</p>	<p>The new Access Shower / Toilet in the centre of the building is required in this location to ensure that it is co-located with the sickbay which meets both compliance obligations and stakeholder requirements.</p> <p>Two out of the four original rooms remain interpretable in full volume, with the third also remaining largely interpretable with a partition wall down the middle. The difference in materiality that will exist between the original walls and new walls will also allow for the interpretation of spaces. The installation of new walls will be fully reversible with no negative impact upon significant heritage fabric (i.e., there is no direct junction between architraves or dado rails etc). Should there be a future desire to revert to the original four classrooms, this can be easily undertaken with no impact to heritage fabric.</p> <p>The classroom spaces within the 1925 building are currently smaller than educational standards require which is why the new teaching building is proposed – to ensure a modern, compliant teaching facility. By adapting the 1925 building into an administration building, it will ensure that the building does not fall into a state of redundancy and disuse, and also allows for the ongoing operational use of the school, which is an integral component of the school’s heritage significance as the school must continue to operate in its historical use and context. The classrooms in their original layout are maintained through adaptation, which is reversible and protects early fabric should reinstatement of these spaces be required in the future, meaning the development is consistent with Burra Charter and ensures no adverse impact on the aesthetic and historical significance of the original 1925 classroom building and the Bangalow Heritage Conservation Area.</p>
<p>C. Partial removal of the original windows and historic brickwork in Classroom 4 to create a new entry vestibule will have an adverse impact on significant heritage fabric. The SOHI has not clearly demonstrated why other options were not investigated and why this solution is the preferred and only option.</p>	<p>Due to the location of the access ramp and connectivity to the school’s main entrance and walkways, the location of the new entrance vestibule and reception area is regarded as the most appropriate and compliant location within the building.</p> <p>Alternative options were considered by the Project Team to convert the doorway into a small counter space for reception instead of the windows; however, this would result in greater negative impacts upon early fabric, as the original doorway would have had to be altered and access into the room would be cut/restricted and result in new openings required. Furthermore, the doorway would not provide the necessary space required to run and effective reception and accessibility requirements, hence the preferred option proposed.</p> <p>The proposal to remove the brickwork below the bottom sash and then store on-site for future re-installation if desired, paired with an Archival Recording by a suitably qualified heritage consultant, has mitigated these negative impacts so that it will only pose a minor impact upon the overall heritage significance of the place as these works are fully reversible if desired (comments surrounding the likelihood of this fabric being reinstated is redundant as there is no way to know what future works and uses may be for the building). The sash windows will remain intact and interpretable, as well as being able to be interpreted alongside the other sash windows across the corridor.</p>



RFI	AHS Response
1C. (cont.)	<p>The reversibility of these works meets Burra Charter initiatives and therefore only constitutes as a minor impact to heritage fabric and significance on this basis, compared with the earlier option which proposed their removal entirely.</p> <p>It is our view that (assuming the recommended measures to manage this impact are administered) the proposed works do not have an adverse impact on the aesthetic and historical significance of the original 1925 classroom building and the Bangalow Heritage Conservation Area.</p>
Council Comments 01/12/2021	
<p><u>1. New Teaching Building</u></p> <p>To help Council and the public understand the visual impact of the proposal, please provide:</p> <p>A. Graphic evidence including photomontages showing views of the new teaching building and the school site from Byron Street.</p>	<p>Please see photomontages below which demonstrates the setback of the building and indicates how key views and vistas from Byron Street toward the 1925 building will not be distorted, nor will the new building overpower or overshadow the 1925 building in its historical context.</p> <p>Please also see abovementioned commentary/response.</p> <p>It is our view that the proposed works do not have an adverse impact on the aesthetic and historical significance of the original 1925 classroom building and the Bangalow Heritage Conservation Area, noting a very careful program has been deployed to locate the new building a substantial distance away from the frontage and significance building and landscape features of heritage significance.</p>
<p>B. A detailed schedule of colours and finishes for the new teaching building. Councils' heritage advisor noted that Surfmist is a reflective light white colour which is out of character with the conservation area. Traditional galvanised roofs tend to weather to a dull-grey, so a mid-grey or brown tone is preferred as a more recessive colour behind the terracotta roof of the old school building. Several photomontages could be provided to illustrate different roof colours and finishes.</p>	<p>Please see material sample boards and photomontages below, noting that the initial submission presented a darker colouring than the Shale Grey that is being proposed. This colouring fits in with the mid-grey colouring suggested by Council which we agree is an appropriate colour for this element.</p>

Please read over page.



RFI	AHS Response
<p><u>2. Historic Classroom Building</u></p> <p>To help explain and justify the proposed changes to the historic classroom building, please provide:</p> <p>A. Detailed internal plans, sections and elevations illustrating how the proposed partition walls and entry vestibule will be located in relation to the historic spaces and internal historic elements of joinery, dado rails and dado mouldings, etc. It is noted that some new walls are located close to existing windows and architraves. Details of all the original doors and joinery are to be shown on the plans.</p>	<p>Please see abovementioned commentary/response surrounding the layout of the 1925 building and connections with original architraves, dado rails etc.</p> <p>Our assessment finds that the proposal is highly developed and has ensured all works are fully reversible and avoids impact upon early fabric such as much as possible – to a high level of rigour.</p>
<p>B. An explanation why there are no alternative options available that would avoid or minimise impacts on original fabric and classroom layout. Also include background information explaining why the original classroom building is being converted to an administration block and not retained for its original use and purpose.</p>	<p>Please see abovementioned commentary/response.</p> <p>The 1925 classroom building is being converted into an administration block as it currently does not meet education standards for classrooms and therefore requires a new teaching block to accommodate contemporary needs and operations.</p> <p>To ensure the 1925 building continues to be utilised and does not become redundant, its use as the administrative centre of the school is regarded as acceptable, especially as it is in an optimal location located close to the school’s main entrance from Byron Street and adjoining to main walkways.</p> <p>no alternative options (e.g. continued use as a classroom) are available that would avoid or minimise impacts on original fabric and classroom layout further than this proposal.</p>



Key Views and Photomontages



Figure 1: Existing primary view toward Bangalow Public School from Byron Street (noting the 1925 Building to the right of the image) (FKG, 2021).



Figure 2: Photomontage One: Proposed new teaching building in relation to 1925 building. Primary view from Byron Street (Williams Architects, 2021).



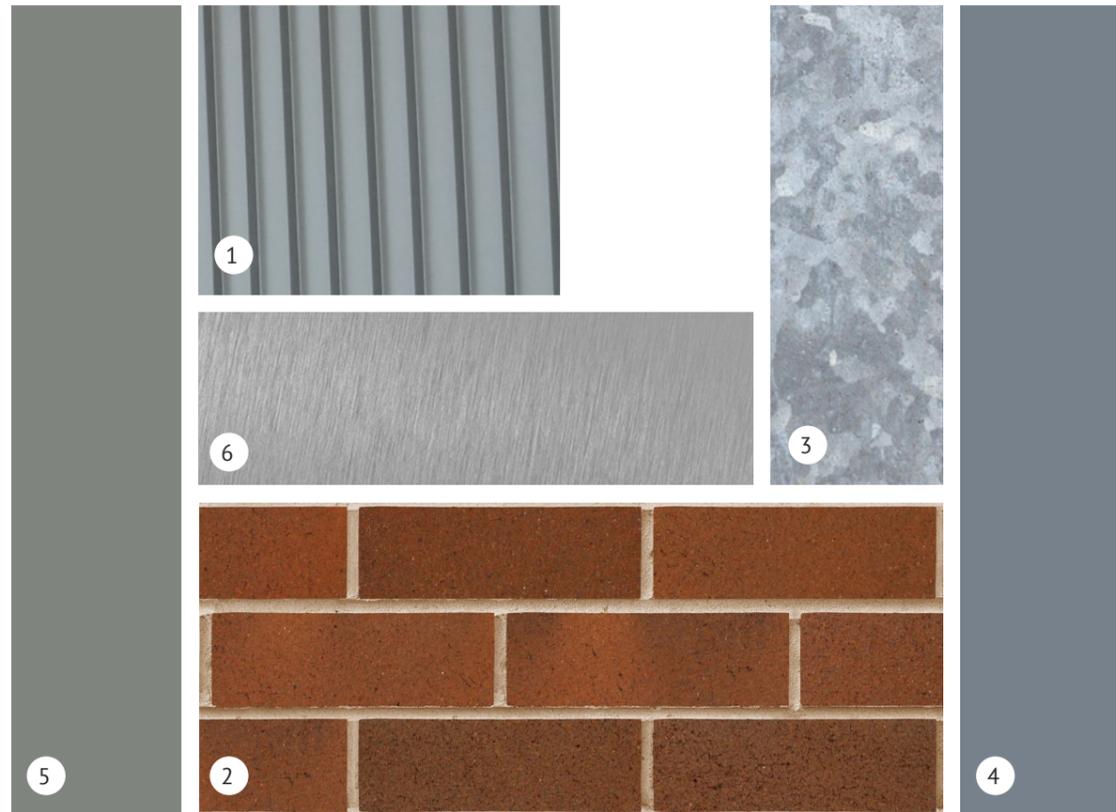
Figure 3: Photomontage Two: Proposed new teaching building. Primary viewshed from Byron Street (Williams Architects, 2021).



Figure 4: Photomontage Four: Proposed new teaching building. Secondary viewed from corner of Byron Street and Station Lane (Williams Architects, 2021).



Figure 5: Photomontage Four showing proposed new teaching building. Secondary viewshed from corner of Byron Street and Station Lane (Williams Architects, 2021).



Roofing

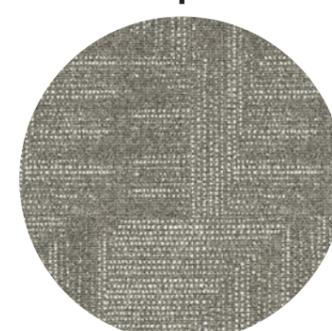
1. Roof Sheetting MRSC-LL -
Lysaght Longline 305 Shale Grey

Walls & Posts

2. Face Brick BRF -
Bowral 76 Series Gertrudis Brown
- 3 Steel Posts & Balustrades -
Hot Dipped Galvanised

Doors & Windows

4. Solid Core Doors -
Dulux Wash & Wear Gloss Tinker (PT-125)
5. Gates & Screens -
Powdercoated Aluminium Colorbond
Windspray
6. Aluminium Door & Window Frames -
Natural Anodised



In summary, the proposed works are considered appropriate from a heritage perspective and appropriate within the Bangalow Public School and Bangalow Conservation Area.

No major detrimental impacts to heritage fabric within the overall site or the 1925 building (A Block) are being undertaken, with all works within the 1925 building avoiding connection to heritage fabric and/or being fully reversible in nature. Other heritage buildings are not affected by the proposed works, including relevant landscape and setting attributes outlined within the LEP.

The new teaching building utilises an appropriate form, volume, and scale and is set back an adequate distance from the school and Byron Street Streetscape. It's materiality and colouring blend with its surrounds and is not obstructive to viewsheds, nor does it detract from the 1925 heritage building.

These proposed works are necessary to ensure the Bangalow Public School continues to operate efficiently and meets the requirements of contemporary educational standards for classrooms and teaching spaces, as well as DDA access compliance. By providing a new teaching building for students and staff, as well as ensuring the 1925 building continues to be utilised in a productive manner, the proposed works will enhance the school as a community asset and ensure that it continues to operate within its historical use – as a functioning school now and for future generations.

It is our view that (assuming the recommended management measures are undertaken in accordance with the SOHI report) that the proposed development will not have an adverse impact on the aesthetic and historical significance of the original 1925 classroom building and the Bangalow Heritage Conservation Area.

Thank you for the opportunity to provide this response. Your further enquiries would be welcomed.

Yours sincerely,



Benjamin Gall

Managing Director

ABN: 51 605 153 419

P: 07-3221 0000 | M: 0476 272 273

E: ben@ahspecialists.com.au

Level 8, Brisbane North Point, 231 North Quay BRISBANE QLD 4000

