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Department of Planning &
Environment
23-33 Bridge Street
Sydney
NSW 2000

By online submission
16 September 2016
Attention: Andy Nixey

Dear Sir,

**Re: Proposed Redevelopment of 75-85 Harrington Street,
The Rocks, SSD 15/3037**

I write in regard to the proposal to demolish the modern office building at 75-85 Harrington Street and replace it with a larger building. No. 75-85 Harrington Street is one of the modern infill buildings specifically designed to be erected within The Rocks Conservation Area. The building envelope was developed so as to not dominate the surrounding significant State Heritage Register listed items such as the 1840s Susannah Place (SHR 01310) and the 1850s Jobbins Terrace (SHR 01553). The design was carefully conceived to sit well in views from the early surviving laneways such as Longs Lane. In the past these infill developments were undertaken in such a manner that the income received could then be utilised by SCRA (now SHFA) to undertake the conservation of buildings within The Rocks Conservation Area. The success of the conservation of this area of townscape has resulted in the area remaining a tourist drawcard

The current proposal seeks a larger envelope within the section of The Rocks that was to remain of a scale complimentary to the surviving nineteenth and early twentieth century building stock within the conservation area. Larger scale buildings were to be constructed in the sacrificial area to the south of the Cahill Expressway. This was the basis of the SCRA planning scheme and provided for the retention of the character of the conservation area by only permitting infill of a similar scale. The buildings were to step down the hillside as the nineteenth century buildings built 'on the rocks' did. The current building envelope has been developed to protect the attributes of the conservation area. The proposal to add additional space is of benefit to the proponent but does not provide any long term benefits to this significant precinct. The historic buildings on this site have already been conserved and are merely to be reworked so there is no conservation benefit beyond what has already occurred.

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In addition the proposal to replace a recent building, a building capable of being retrofitted, will result in the generation of so much waste that no matter how energy efficient the proposal is, its construction will still add to the problem of energy emission rather than attempting to lessen them. Rapid building replacement cycles of buildings are adding to Australia's emissions problem.

The Conservation Management Plan (CMP) and Statement of Heritage Impact for this property have been prepared for the proponent. These studies are based on previous reports and did not include the findings of the recent study commissioned by SHFA regarding the significance of the terrace houses in its portfolio. This study was entitled *Terrace Houses in The Rocks, A Comparative Analysis and Assessment* and was prepared by Jean Rice Architect in 2014 (of which I was one of the authors).

This study has found that the extent, range and date of types and authenticity of surviving terrace house stock in The Rocks is of very high cultural significance and is unique in Australia. The surviving terraces in The Rocks are potentially of national historical and aesthetic significance as the area contains rare and intact early examples. The conserved terraces in The Rocks, particularly when viewed in the context of the very early examples in Millers Point, form a unique library where the detail of the range of housing types, from the 1820s on, can be traced in the physical and documentary record. This historic character continues to attract numerous visitors to the area.

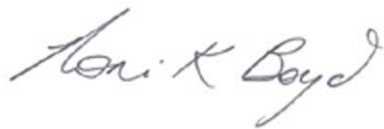
The analysis undertaken in the CMP prepared for the proponent is a general one for housing stock of this age, and does not demonstrate a particular understanding of this building group. Detailed archival material held by SHFA was largely not utilized; the majority of the information was simply drawn repeated from a previous report. Detailed material available at the City Council Archives also has not been consulted. The methodology for the preparation of a Conservation Management Plan (CMP) requires that a study of documentary evidence as to the changing configuration of the building be undertaken. This has not been adequately undertaken in this case.

The 2014 Terrace House study found that the previous buildings on the site were condemned following inspections by the Lord Mayor of Sydney and the City Building Inspector, as were other properties in the area between Argyle Street and Little Essex Street. As such Bakers Terrace represent an important phase in the sequence of urban renewal of The Rocks but as this phase of development is missing from the CMP Analysis, the buildings have only been assessed as being historically significant at a local level.

The proposal as it stands to increase the building envelope does not provide a benefit to the long-term conservation of The Rocks, one of the most important conservation areas in Australia. Rethinking the proposal could achieve a solution that allows the use of the site to be altered whilst retaining the permissible building envelope, including a more responsible approach to the treatment of the existing building, an approach that maintains elements that were designed for a much longer life span, such as the concrete floor slabs.

NSW should have a more highly developed sense of responsibility towards the conservation of the built environment than to permit the replacement of substantial buildings carefully designed to sit well within their historic context erected during the 1980s.

If you should have any queries regarding this submission, I can be contacted on noni.kay.boyd@gmail.com or 0412 737 921

A handwritten signature in dark ink, reading "Noni K Boyd". The signature is written in a cursive, flowing style with a large initial 'N' and a stylized 'K'.

Dr Noni Boyd
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