



Response to Submissions

Proposed Outdoor Dining & Intervention (Eastern Wall Opening)

State Significant Development Application: Berrima Hotel (SSD-66876472)

Submission Package Includes:

- Cover Letter (Blue Sox)
- Letter from Matt Moran (AM)
- Letter from Sandall + Co
- Heritage Assessment (Urbis)
- Place Experience Analysis (Right Angle)
- Building Code Compliance (Credwell)
- Key Precinct Factors of Success (Macroplan)
- Alternative Wall Intervention Scenario Studies (Turner)



18 June 2026

NSW Department of Planning, Housing & Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Re: **SSD-66876472 BERRIMA HOTEL** (The Berrima Quarter) - Response to Submissions

Response by: **NSW Department of Planning, Housing & Infrastructure (DPHI)**
NSW Gov.- DCCEEW (Heritage Council of NSW)

Issue Raised: Heritage (Built Form)

Att: Andrew Newman (Principal Planning Officer)

Dear Mr Newman,

In response to item 1 of the Department's submission regarding heritage and built form impacts, we provide the enclosed supplementary assessments for consideration by the Department in finalising its recommendation to the Independent Planning Commission for determining the Blue Sox Group proposal for the adaptive reuse of the former Berrima Correctional Centre and former Berrima Gaol.

This response specifically addresses the proposed opening within the eastern perimeter wall which is driven by the need for an outdoor dining area proposed within the front garden precinct. The additional investigations undertaken examine the proposal from heritage, visitor experience (place making), retail viability, building code compliance and architectural perspectives. We also enclose letters from renowned Australian chef & restaurateur Matt Moran (AM) and chef, restaurateur & hospitality consultant Mr Simon Sandall of Sandall + Co. Running some of the countries most celebrated restaurants Matt Morans career in the food and hospitality industry has spanned over 40 years. His award winning achievements have helped shape the nation's culinary landscape with renowned venues like Aria, Chiswick, and Chophouse.

Sandall + Co. is a hospitality consultancy established and led by Mr Simon Sandall - Simon is an international chef and restaurateur with over 30 years experience in the restaurant, catering & hospitality industry. His international work includes working for The Ritz Club (Ritz Hotel, London), Les Ambassadeurs Club (London), Swallow Royal Hotel (Bristol), The Brownsover Hall Hotel and the Grosvenor House Hotel (Rugby, England). Closer to home Simon has worked in hatted restaurants in Sydney since 1999, including 8 years as the Head Chef of Aria and 17 years as the Executive Chef of The MorSul Group (now Solotel). Simon established ARIA Catering, the resident caterer at The Sydney Opera House. He went on to become Group Executive Chef leading the kitchen teams across Aria Sydney and Brisbane Aria Catering, Chiswick, Chiswick at the Gallery, Opera Bar, River Bar (Brisbane) and North Bondi Fish. In 2018 he opened his own restaurant Boronia Kitchen.

The position of the project team collectively is that the proposed eastern wall opening represents a carefully considered, reversible and proportionate intervention that is necessary to achieve the successful adaptive reuse of the site while maintaining and celebrating its heritage significance. The proposal seeks to strike an appropriate balance between conservation, activation and the long-term viability of the precinct with the ultimate goal of ensuring the survival of one of New South Wales' most significant heritage assets.

The adaptive reuse of the gaol presents a unique opportunity to transform an important heritage place into a vibrant public destination. While the site's imposing perimeter walls and entry gate house are the remaining essence of the sites heritage significance and sense of place, they also create inherent challenges relating to visibility, accessibility and public engagement. Converting a building designed to shut the world out and imprison those within to one that needs to be inviting and welcoming of people and one that needs to actively engage with the community whilst maintaining those very opposing attributes is indeed perhaps the ultimate paradoxical challenge to overcome. For the proposal to succeed as a hospitality, tourism and accommodation destination, it must establish a meaningful relationship between the activities occurring within the precinct and the public realm beyond its walls.

The south-eastern garden which addresses Argyle Street and which fronts the historic gatehouse, provides the site's most prominent, most engaging and most publicly accessible open space. Activating this area through outdoor dining will create a welcoming interface between the precinct and the township, encouraging and capitalising on visitation, increasing public engagement with the heritage asset and reinforcing the site's role as a destination within Berrima and indeed within the greater Southern Highlands region.

To further investigate the matters raised by the Department, the applicant commissioned additional expert assessments. Right Angle, an urban strategy and placemaking company examined the proposal from a place-making and visitor experience perspective, Macroplan, an urban economist, property analyst and town planning consultant assessed the proposal against recognised retail and hospitality success factors, Turner, the project architect explored alternative architectural design solutions, Credwell, the project BCA consultant reviewed building code compliance matters, and the project heritage consultant Urbis separately further considered heritage impacts.

Collectively, these assessments support the conclusion that the proposed eastern wall opening represents the most appropriate and least intrusive means of delivering the activation and commercial outcomes necessary for the successful adaptive reuse of the site. We note also the proposal submitted is consistent with the vision for the site put to the NSW government as part of the EOI sale process and is consistent with the concept design submitted to the Department as part of the SEAR's application.

Building Code Compliance

The additional building code assessment identifies that, based on the maximum permissible population of the gaol (calculated under the National Construction Code), a total emergency egress opening (fire escape) width of 7.0 metres is required through the perimeter walls. The existing 1866 gatehouse entry and western perimeter wall openings provide approximately 4.0 metres of compliant exit width, leaving a shortfall of 3.0 metres that must be accommodated elsewhere within the perimeter walls.

Importantly, this assessment is based on the doors to the historic 1866 gatehouse remaining open during events and functions. The explanation for this is that the existing gatehouse doors, including both the metal gate and timber door assemblies, do not satisfy contemporary emergency exit requirements and therefore would impede emergency egress if left closed during periods of peak occupancy.

While the proposed eastern wall opening is primarily sought to facilitate direct access between the restaurant and outdoor dining area, it also assists in addressing the practical and operational requirements associated with occupant safety and emergency evacuation. The proposal therefore delivers a dual benefit, improving functionality and meeting compliance outcomes while minimising the need for more extensive interventions elsewhere on the site (as demonstrated in the alternative 'southern wall' design options provided by Turner)

Assessment of Alternative Outdoor Dining Locations

Turner Architects have developed a range of alternative design scenarios for locating the outdoor dining area on the southern side of the gaol. These scenarios were carefully considered and tested against heritage, operational, accessibility and visitor experience criteria.

The investigations demonstrate that all southern-side scenarios involve substantially greater intervention than the proposed eastern wall opening. Depending on the design option, these interventions include elevated decks and platforms, extensive ramps and stairs, significant structural works and, in some cases, the removal or alteration of heritage fabric including the former police holding cells.

Several scenarios also present operational difficulties associated with food and beverage service, accessibility and customer circulation. One scenario requires the removal of the existing garage structure, while another raises concerns regarding potential impacts on the integrity of the perimeter wall foundations.

The assessment therefore demonstrates that alternative southern-side solutions would either generate greater heritage impacts (in our view), create inferior visitor outcomes, or require more extensive physical intervention than the proposed eastern wall opening causing significant negative impacts to the functionality and viability of the site overall.

Place-Making, Visitor Experience and Long-Term Viability

The investigations undertaken by Right Angle and Macroplan demonstrate that outdoor dining is not simply an ancillary component of the proposal but a critical element in achieving a successful, viable and vibrant adaptive reuse outcome.

The south-eastern garden is uniquely positioned to support this objective. It benefits from superior solar access, greater protection from the prevailing westerly winds, stronger visual and physical connection to Argyle Street & the retail precinct beyond, having a magnificent backdrop of the historic 1866 gatehouse and direct integration with future activity associated with the Governor's House precinct.

By comparison, the southern side experiences far less favourable environmental conditions, including reduced sunlight, greater exposure to the cold westerly winds and has a generally less inviting setting. Given the climatic conditions of the Southern Highlands, these differences are particularly significant and directly influence the usability of outdoor dining areas throughout the year.

The south-eastern garden also benefits from its relationship to the public realm. Positioned adjacent to the primary arrival sequence and visible from Argyle Street, it creates an opportunity to showcase activity within the precinct and invite public engagement with the site. In contrast, the southern side functions more as a service-oriented or secondary 'back of house' area, disconnected from the primary visitor experience and broader township activity.

Importantly, the objective of the outdoor dining offer is not simply to provide additional seating capacity but to create an active and welcoming destination that encourages visitation, supports tourism, is engaging with the community and strengthens the site's role within Berrima and the region more broadly. These outcomes are fundamental to achieving a sustainable adaptive reuse model capable of supporting the long-term care and conservation of the heritage asset.

Precedent and Adaptive Reuse Outcomes

The additional material submitted includes case studies of adaptive reuse heritage projects and regional hospitality destinations that successfully integrate outdoor dining within heritage settings. Not included in the additional material but worthy of mentioning here are several examples in Australia of adaptively reused gaols which involved considerable new works and significant interventions; Bendigo Gaol was adapted into a theatre and college campus facility and Pentridge Prison was adapted into a multi-venue F&B, retail and hotel precinct. Closer to home Maitland Gaol had an adaptive reuse master plan developed and proposed by Maitland City Council which also involved developing the site and the gaol into a multi-venue precinct including an intervention in the main perimeter wall to service a proposed F&B venue.

These examples and the case studies presented demonstrate that carefully designed interventions within heritage fabric are often necessary to facilitate contemporary uses and improve public access. They also illustrate that heritage conservation and functional adaptation are not competing objectives but complementary outcomes when managed appropriately.

We firmly believe that the proposal before the Department is not without precedent. Rather, the proposal is consistent with a recognised body of adaptive reuse projects where modest and respectful interventions have not only enabled heritage places to remain relevant, accessible and economically sustainable but have made possible their conservation and survival for generations to come.

Final Remarks

We acknowledge that the proposal will alter the existing presentation of the eastern perimeter wall. However, the necessity of this has been thoroughly considered, with the required intervention dutifully designed to be respectful, reversible and subordinate to the broader significance of the place.

The additional investigations now completed & submitted here along with the real world critique by Sandall+Co demonstrate that:

- Outdoor dining is a critical component of the adaptive reuse strategy;
- The eastern garden is clearly by far the most suitable location for outdoor dining from operational, environmental, place-making and visitor experience perspectives;
- Alternative southern-side solutions require greater intervention, create inferior outcomes and/or result in increased impacts on heritage fabric;
- The proposed opening contributes to both operational functionality and building compliance requirements; and
- Having an outdoor dining experience within the existing front garden and convenient access from the outdoor space to the restaurant is critical for the commercial viability of the precinct
- The intervention supports the long-term viability of the precinct, which in turn supports the ongoing conservation of the heritage asset

Ultimately, the conservation of the former Berrima Gaol depends not only on protecting the entirety of its physical fabric but also on establishing a sustainable future use that ensures the place remains active, valued and financially capable of supporting ongoing maintenance and conservation works.

For these reasons, we respectfully submit that the proposed eastern wall opening represents an appropriate, balanced and justified intervention and should be supported as part of the overall adaptive reuse proposal.

The Blue Sox Group

16 June 2026

To Whom It May Concern,

I write to provide independent advice in support of the proposed outdoor dining area and eastern wall opening at The Berrima Quarter. Over a career spanning more than 40 years as a chef and restaurateur in Australia, I have opened and operated numerous venues across a range of settings, and I offer this assessment based on that experience.

Street presence and visibility are fundamental to the commercial viability of any hospitality venue. A restaurant that cannot be seen from the street is, in practical terms, unknown to the passing public, and an unknown venue cannot build the patronage required to sustain itself. The front garden, visible from Argyle Street, is the only aspect of this site that provides a genuine public interface. An activated outdoor dining terrace in this location would signal to visitors that the precinct is open and operating, drawing in the casual and passing trade that regional hospitality businesses depend upon. No alternative configuration on the southern side of the site can replicate this.

Climate and operational efficiency are equally important considerations. The eastern garden benefits from morning and midday sun and is sheltered from prevailing winds, making it suitable for outdoor dining throughout much of the year. The southern side of the site does not offer these conditions. Furthermore, the viability of any outdoor dining area is directly linked to its proximity and connection to the kitchen. Food service requires a direct, level connection to maintain quality, speed and staff safety. A southern entry would necessitate significant level changes, introducing operational inefficiencies, increased labour costs and a materially diminished guest experience.

I am mindful of the heritage sensitivity of this site and support any intervention being undertaken with appropriate care. However, it is my view that the eastern wall opening need not be in conflict with the heritage values of The Berrima Quarter, it is the configuration that makes those values economically sustainable. Without it, securing and retaining a credible operator will be considerably more difficult, and without a strong operator, the long-term conservation of the precinct is itself at risk. The eastern wall opening is, in my assessment, the only option that gives this project a genuine prospect of lasting success.

Yours sincerely,



Matt Moran

Chef & Restaurateur

matt@mattmoran.com.au

mattmoran.com.au

12th June 2026

To Whom it May Concern,

I have been asked to provide independent advice on the proposed outdoor dining area to the front (eastern) garden and its direct connection through to the restaurant. My assessment is drawn from thirty-five years operating fine-dining and hospitality venues. Having reviewed the Blue Sox proposal and in particular the additional Response to Submission materials regarding the proposed eastern wall opening my conclusion is unequivocal: front-garden activation, connected directly to the kitchen, is the single configuration in which this restaurant can succeed commercially. The southern alternatives do not make operational sense and pursuing them would materially compromise the viability of the entire precinct.

A restaurant lives or dies on three things: visibility, atmosphere and service efficiency. The front garden delivers all three; the southern side delivers none.

Visibility. A venue concealed behind eight-metre-high walls has no street presence. Hospitality is a confidence business, guests, and the quality operators a precinct must attract, need to see that a place is alive and open. The front garden, adjacent the 1866 gate house and visible from Argyle Street, is the only frontage that advertises the offer to passing trade and to the wider visiting public. An outdoor dining scene here is the precinct's "open for business" sign. Without it, the restaurant is invisible and, in practice, unknown and an offer nobody knows exists cannot trade its way to sustainability.

Atmosphere and climate. This is the Southern Highlands. The eastern garden enjoys morning and midday sun and shelter from the prevailing winds; the southern side is cold, wind-exposed and overshadowed by the wall for much of the day. An outdoor area that is unusable through the colder months is not an asset-it is dead capital. No operator will model revenue against seating that closes for half the year, and a terrace that sits cold and empty drags down the perception, and the patronage, of the indoor room beside it.

SANDALL + CO

Service efficiency. This is the point most easily overlooked from outside the trade, and it is decisive. Outdoor dining is only viable when it connects directly and at grade to the kitchen pass. Food must reach the table hot, in seconds, carried by staff who are not negotiating stairs, ramps or elevated decks. Every southern option presented requires substantial structural works and extensive stairs to bridge the level change. That is not a minor inconvenience; it is a permanent operational handicap, slower service, higher labour cost, compromised food quality, and a genuine safety risk for staff carrying plates and glassware. A direct connection from the restaurant to the front garden removes all of it. It is the difference between a service that flows and one that fails nightly.

Operator and commercial reality. Securing a credible operator for a venue hidden inside a heritage gaol is already difficult. Strip out the one configuration that offers visibility, a usable climate and efficient service, and that task becomes harder still, while a precinct without a strong operator cannot generate the income that funds the site's ongoing conservation. The front garden is not a "nice to have." It is the commercial engine that underwrites the heritage outcome and activates the whole precinct for day visitors and overnight guests alike.

I am conscious of the heritage sensitivity of any intervention, and I support the proposed opening being fully reversible and executed with the utmost care. But the choice here is not between heritage and commerce, it is between a precinct that thrives and one that sits dormant. A dormant gaol serves neither the public nor its conservation.

In my professional view, front-garden dining connected through to the restaurant is not merely preferred. It is the only option that gives The Berrima Quarter a genuine chance of lasting success.

With gratitude,

A stylized, handwritten signature in dark ink, appearing to be 'S.S.' with a flourish underneath.

Simon Sandall (ph 0410 518 939)
Director
simon@simonsandall.com