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URBIS

DRAFT SCRA SCHEME VARIATION REQUEST

35-75 Harrington Street, The
Rocks

Prepared for

FAR EAST ROCKS PTY LTD

October 2022

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Project Code	P0031616
Report Number	Final

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1. INTRODUCTION

1.1. BACKGROUND

This Draft SCRA Scheme Variation Request Report has been prepared by Urbis on behalf of Far East Rocks Pty Ltd (**FEO**), and if supported by the Planning Secretary, will accompany an Environmental Impact Statement that seeks approval for the redevelopment of 35-75 Harrington Street, The Rocks (DPE Reference: SSD-32766230).

On 14 December 2021, the Secretary's Environmental Assessment Requirements (**SEARs**) were issued for this project under Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* and the *State Significant Development Guidelines*.

Since receiving SEARs, FEO have undertaken iterative engagement and design review with key stakeholders including Place Management NSW (**PNSW**) (**the landowner**), GA NSW (via the SDRP process), DPE (**the consent authority**) and the City of Sydney Council.

Under the SCRA Scheme, the relevant Building Site Control Drawing for 35-75 Harrington Street, The Rocks is Drawing XXXVI. The current and applicable version is XXXVI(1), endorsed by the Minister on 2 June 1986. The SCRA Scheme building envelopes were developed when the original 'Clocktower' building was approved in 1986 (and largely 'shrink-wraps' the Clocktower building). It is noteworthy that the SCRA envelope on the Rendezvous Hotel contains several anomalies and is smaller than the existing building.

This report seeks to formally vary the SCRA Scheme to facilitate the proposed works under SSD-32766230.

1.2. CONSULTATION

This request has been subject to meaningful and proactive engagement with a variety of key stakeholders, including the landowner (PNSW), the City of Sydney Council, and DPE. This consultation has involved design principles workshoping and initial massing considerations. This ongoing dialogue has informed the design of a preferred option that balances a wide range of design, heritage, commercial and planning items.

This consultation process has included:

- 7 x meetings with PNSW;
- 3 x sessions with State Design Review Panel (**SDRP**);
- 3 x meetings with DPE;
- 3 x meetings with Council; and
- 1 x meeting with Heritage NSW Approval Committee.

Following the most design review session held with the SDRP (on 14 September 2022), the applicant received written advice and recommendations from the SDRP. The advice focused on the proposed massing and permeability to the public realm and on the architectural and urban design qualities of the proposal. The SDRP largely supported the revised massing, subject to further refinement of the envelope.

1.3. PROPOSED DEVELOPMENT

The proposed works under SSD-32766230 broadly involve:

- Demolition of the existing 'Clocktower' building.
- Alterations to the basement car park to upgrade it to code compliance.
- Vehicular access will be maintained via Harrington Street (below the existing Rendezvous Hotel).
- Construction of a new hotel building, with supporting retail uses at lower levels.
- Provision of publicly accessible through site links.
- Various landscaping and public domain improvements.

1.4. PROPOSED VARIATIONS TO SCRA SCHEME

As the proposed works do not comply with the SCRA Scheme Building Site Control Drawing, the EP&A Regulations require a formal variation to the plan prior to the approval of the SSDA.

DPE protocols also require the draft variation to be supported by the Planning Secretary prior to the EIS/SSDA being lodged and publicly exhibited.

The current provisions of the SCRA Scheme limit the maximum height of buildings on the site to RL 35.5m with a lower building height at RL 27.0m (fronting Harrington and Argyle Streets). The proposed building has been designed to have the following maximum RLs:

- Top of Quincy Hotel Rooftop – RL 40.9m.
- Quincy Hotel Parapet – RL37.9m.
- Harrington Street Podium – RL 23.15m and RL 24.7m.
- Argyle Street Podium – RL 26m.

To address existing anomalies with the Rendezvous Hotel envelope, a 'special note' has been added to the SCRA drawing to indicate that PV panels and like-for-like replacement of existing plant equipment are permissible above the SCRA on the Rendezvous Hotel rooftop.

1.5. STATUTORY CONTEXT

This application is made under Clause 4 of the *Environmental Planning and Assessment (Sydney Cove) Savings and Transitional Regulation 1999*. If the Planning Secretary supports the draft variation, it will be exhibited concurrently with the EIS, which seeks consent from the Minister for Planning under Part 4 of the *Environmental Planning and Assessment Act 1979*.

Clause 9(2) of the *Environmental Planning and Assessment (Sydney Cove) Savings and Transitional Regulation 1999* sets out the matters for consideration for any draft variation to the SCRA Scheme. An assessment of the proposed variation against Clause 9(2) has been undertaken as part of this report.

1.6. SUBJECT SITE

The site is located at 35-75 Harrington Street, The Rocks and is legally described as Lot 1 in Deposited Plan 775889. The land, which has an approximate site area of 3,599sqm, is under the freehold ownership of Place Management NSW (PNSW). A Site Location Map is provided below (Figure 1).

Figure 1 – Site Location Plan



Source: Urbis

2. APPLICABLE BUILDING SITE CONTROL DRAWING

The Sydney Cove Redevelopment Authority (SCRA) Scheme was prepared under the former *Sydney Cove Redevelopment Authority Act 1968* and is a deemed SEPP under Schedule 6 of the EP&A Act.

The relevant Building Site Control Drawing for the site at 35-75 Harrington Street is Drawing XXXVI. The current and applicable version is Drawing XXXVI(1) endorsed by the Minister on 2 June 1986 (refer to Figure 2 below).

Building Envelope:

- The maximum permitted building height across the bulk of the site is RL 35.5 metres with a lower building height at RL 27 metres.
- The terraces fronting Harrington Street are noted as being Historic Buildings. Under the SCRA Scheme Historic Buildings are not provided with building envelopes.

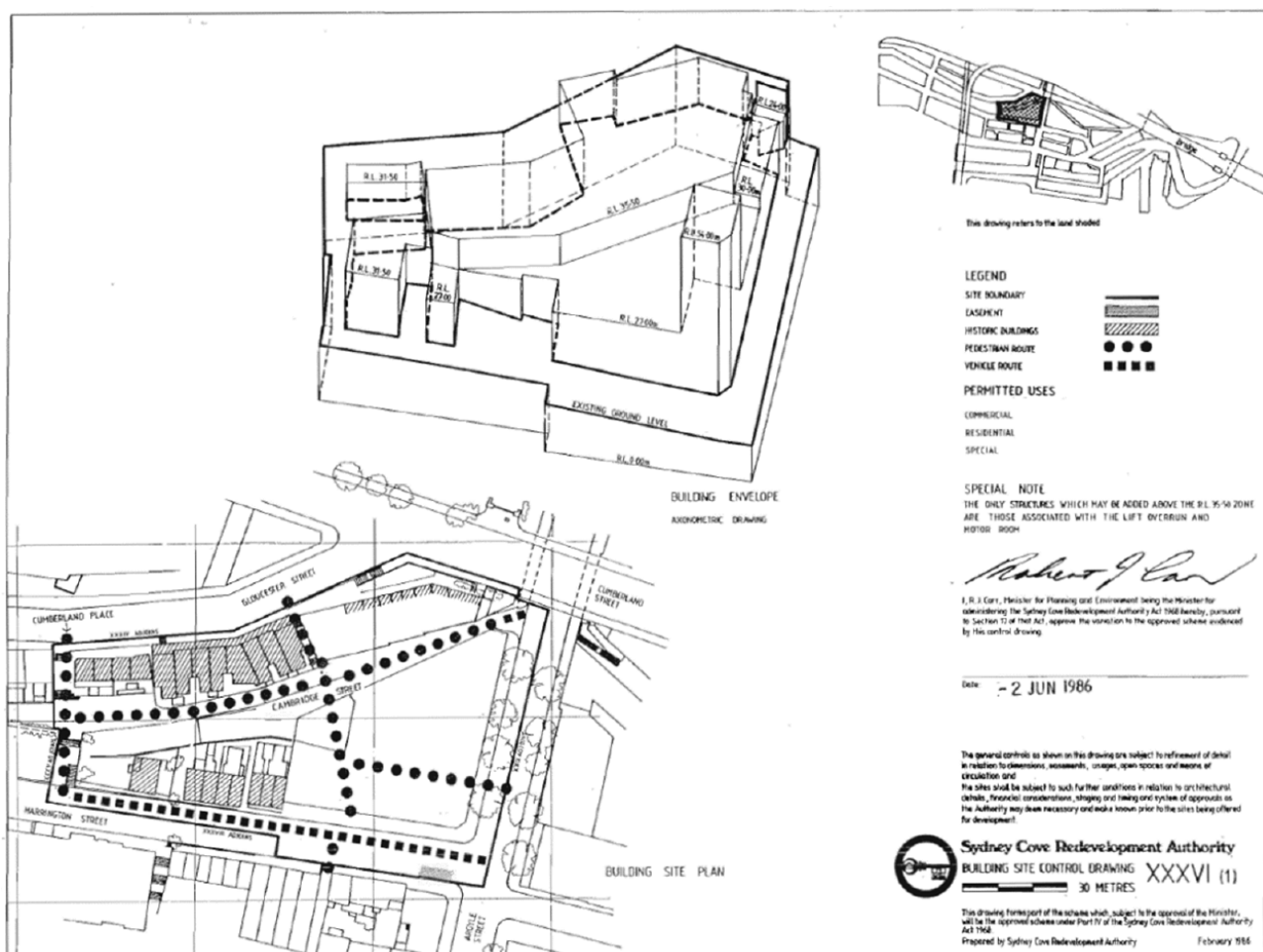
The proposed building envelopes were developed when the original building was approved in 1986.

Permissible Uses:

Building Site Control Drawing XXXVI(1) specifies the following requirements in relation to development of this site:

- Permitted uses are 'Commercial', 'Residential' and 'Special'.
 - 'Commercial' deemed to include Business, Office, Retail and food and beverage facilities.
 - 'Residential' under the SCRA Scheme deemed to include Hotels, Motel and Serviced Apartments.

Figure 2 – SCRA Site Control Drawing XXXVI(1)



Source: SCRA Scheme

3. VARIATION TO SCRA SCHEME

This application is made under Part 2 of *Environmental Planning and Assessment (Sydney Cove) Savings and Transitional Regulation 1999*. A variation is sought to the approved scheme to enable the Minister to grant development consent to the SSD application. This section of the report includes:

- A description of the way in which the proposed development does not comply with the relevant provisions contained within SCRA Scheme;
- Reasons for the variation to the current provisions of the SCRA Scheme; and
- Assessment of the matters listed in Clause 9(2) of the Regulation.

3.1. DESCRIPTION OF THE PROPOSED SCRA VARIATION

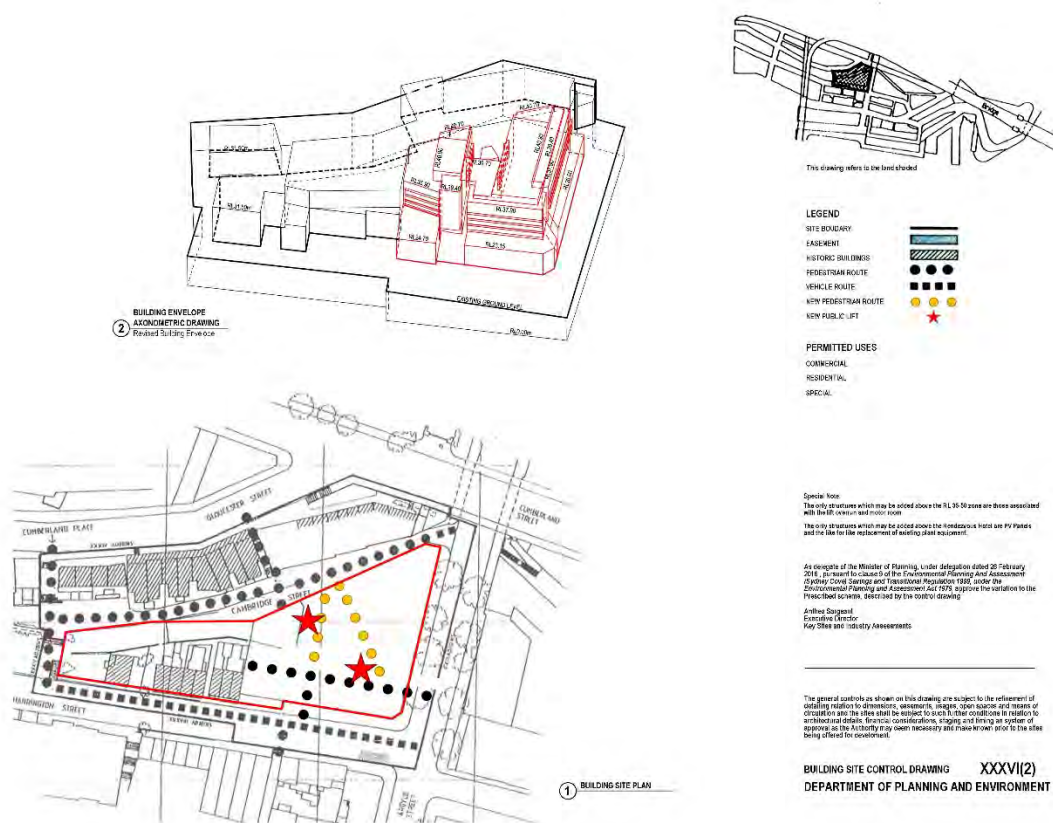
The relevant Building Site Control Drawing for the site at 35-75 Harrington Street is Drawing XXXVI. The current and applicable version is Drawing XXXVI(1) endorsed by the Minister on 2 June 1986 (Figure 2).

The current provisions of the SCRA Scheme limit the maximum height of buildings across the bulk of the site to RL35.5 metres, with a lower building height at RL27 metres at frontages to Harrington and Argyle Streets. The terraces fronting Harrington Street are noted as being Historic Buildings. Under the SCRA Scheme Historic Buildings are not provided with building envelopes. The proposed building has been designed to have the following maximum RLs:

- Top of Quincy Hotel Rooftop – RL 40.9m.
- Quincy Hotel Parapet – RL37.9m.
- Harrington Street Podium – RL 23.15m and RL 24.7m.
- Argyle Street Podium – RL 26m.

To address existing anomalies with the Rendezvous Hotel envelope, a 'special note' has been added to the SCRA drawing to indicate that PV panels (and existing plant) are permissible above the SCRA on the Rendezvous Hotel rooftop. A reduced sized copy of the replacement drawing is provided as **Figure 3**.

Figure 3 – Proposed Variation to the SCRA Scheme



Source: FJMT

The proposed variations assist in delivering the following benefits:

- Elevation to enhance views of the harbour for visitors to the hotel, noting a publicly accessible rooftop bar is proposed on the upper floor of the development.
- Provides new publicly accessible through-site links (informed by desire lines) to the surrounding street network to enhance pedestrian flow and connectivity across the precinct. These links will be compliant with Disability Access provisions, which is currently a major challenge in The Rocks.
- Relates to (and is consistent with) the surrounding built form context. The proposal will enhance activation and vibrancy in the precinct, and along all street frontages.
- Respects the heritage significance of The Rocks through restoration of the heritage streetscape scale and character to all street frontages.
- Avoids detrimental visual impacts or view loss.
- Avoids any additional overshadowing to the Gloucester Street residential terraces.
- Provides a neutral sun access and sky view factor to the surrounding public domain, while increasing daylight amenity to Cambridge Street; and
- Resolves the existing Rendezvous Hotel SCRA envelope discrepancies / anomalies.

Additional detail regarding the design rationale for the proposed development is provided in the Design Statement prepared by FJMT (**Appendix B**). Justification for the proposed variation to the SCRA Scheme is provided in the following section of this report.

3.2. REASONS FOR THE VARIATION

The proposed reasons for the variation to the SCRA Scheme are as follows:

- The existing built form on the site relates very poorly to the surrounding context, is limited in commercial functionality, has minimal pedestrian connectivity, and offers poor street activation.
- The Applicant is seeking to redevelop the existing commercial building, to provide a hotel development that will revitalise the site.
- The proposed massing has been subject of over 12 months of ongoing work and discussions with various stakeholders. In assessing the reasonableness of additional building height, the applicant has liaised closely with the Place Management NSW, the GA NSW (through three SDRP sessions), the City of Sydney and Heritage NSW.
- Through this process, the proposal is considered to represent an appropriate response to the site. The proposal includes through site links, high pedestrian connectivity, retail activation, together with a very well resolved and articulated built form that can deliver a range of public benefits.
- To deliver a range of public benefits, an increase in building height in the central portion of the site is proposed, which transitions down to a pedestrian scale at Harrington Street and Argyle Street.
- While a building height variation to the SCRA Scheme is sought, the design of the envelope will result in a very articulated built form that represents a substantial improvement on the existing condition. The total proposed floor space on the site is neutral compared with the existing building, albeit arranged in a more logical manner.

Overall, it is considered that the variation to the SCRA Scheme will facilitate delivery of an appropriate infill building in a manner that respects its context and minimises potential impacts on the amenity of the locality.

3.3. CLAUSE 9(2) ASSESSMENT

Clause 9 of the *Environmental Planning and Assessment (Sydney Cove) Savings and Transitional Regulation 1999* provides an overview of the key statutory considerations the Minister must consider in determining to grant a variation to SCRA Scheme.

The proposed variation to the approved scheme has been assessed in accordance with the provisions of Clause 9(2) as outlined below:

(a)(i) *Will not permit development that will adversely affect development on adjoining land*

As required by the SEARs, the proposed development (and the variation of the SCRA Scheme) has had to examine a range of potential impacts on the surrounding properties. The proposed building will not result in any adverse impacts on the adjoining development as summarised below:

- **Streetscape and visual impacts:** The proposal relates positively to the streetscape by:
 - Restoring the heritage streetscape scale and character to all street frontages.
 - Greater through site connectivity, informed by desire lines.
 - Increased public domain space via three new publicly accessible spaces and through site links.
 - Enhances retail access and activation to all street frontages.
 - DDA access through the site.
 - Opportunities for implementation of First Nations design framework and public art.
- **Views and vistas:** A Preliminary Visual Impact Assessment (VIA) has been prepared (at **Appendix C**) to assess impacts of the proposed envelope from a selection of public viewpoints. The VIA concludes:
 - Due to the relationship between natural and built factors, topography, the public domain and built form, in the longer range the proposed envelope would be most visible from viewpoints located to the south and east of the site. Given the steeper topography to the west, the envelope also becomes visible from the west in the medium range (along Cahill Expressway for example).
 - The envelope would be visible by a range and large number of people in the immediate public domain, in particular those along the Harrington and Argyle intersection, given the significant corner interface and frontages afforded to these streets.
 - Given the breadth and number of views, the envelope will be visible as a new element in the foreground, midground and background of various views.
 - The proposed building envelope will present overall a more uniform built form that is less visually prominent (due to removal of the existing tower element) and will generally result in a similar or less level of view loss (compared to the SCRA envelope) in the public domain, to iconic elements in the landscape, such as water elements, the Sydney Opera House, and the Sydney Harbour Bridge.
 - Overall, the visual impact of the proposed envelope on the public domain viewpoints ranges from negligible to moderate, with the Argyle Stairs viewpoint being the only one to be given a moderate visual impact ranking. This is largely due to the scale of visual change that the proposal will enable.
 - The envelope will not be visible from significant view locations including Observatory Hill and will have a negligible to low visual impact on long range views. The SCRA envelope, by comparison, is visible and intrudes on views of the horizon from the selected long-range viewpoints.
- **Solar access:** The proposal will result in positive solar access outcomes by:
 - Resulting in no additional overshadowing of the Gloucester Street residential terraces.
 - Neutral sun access and by view factor to surrounding public domain.
 - Increased daylight access to Cambridge Street.

Overall, the proposed variation to the SCRA Scheme will facilitate the construction of a building that is appropriate for the site and its context. The elevation of the building above the ground plane will improve the physical and visual connectivity to the harbour and enhance the public domain.

(a)(ii) *heritage significance of buildings, structures or sites in the locality*

Urbis Heritage has prepared a Preliminary Heritage Assessment Report (**Appendix D**). The report makes the following conclusions in relation to the proposed SCRA Scheme amendment:

- The added height and volume will be of a neutral impact. At ground level, and within the surrounding streetscape, there will be little to no visibility of the configuration from the upper levels (due to the bulk form being moved centrally within the site, behind a podium arrangement on Harrington and Argyle Streets).
- Upon viewing from afar, such as from within Circular Quay, the added visual bulk resulting from the increased SCRA, building height and volume will blend in with surrounding development and would be more in keeping with the surrounding heritage context (vs. the existing Clocktower structure).
- The volume and GFA of the existing clocktower will be repurposed to facilitate better accessible common areas across the breadth of the site. The reconfiguration of these upper storeys in lieu of the existing clocktower would have no adverse impact on heritage items in proximity to the site.
- Shadow analysis demonstrates the proposed SCRA envelope will have a neutral impact on sun accessibility and shading throughout the course of the day, across the year. From a heritage perspective this neutrality is acceptable for the conservation area.
- The proposed variation to the SCRA and future new development will have a generally neutral impact on views to the subject site, from both close pedestrian proximity and from afar. Distant views from the Sydney Opera House and the harbour are improved with a form that is more typical of The Rocks, in its broken-down scale and stepping nature.

In summary, Urbis Heritage provide the following concluding statement:

“Overall, it is considered that the variation to the SCRA Scheme will have a generally neutral or positive impact on the heritage significance of The Rocks Conservation Area. It will facilitate the delivery of an appropriate infill building in a manner which respects its context, improves the current contemporary form on the site and minimises its potential impacts on the amenity of the locality.”

(a)(iii) *quality of the public domain in the locality*

The proposed variation to the building height control in the SCRA Scheme will result in several public benefits, including a significant improvement in the quality of the public domain in the immediate locality.

(b) *impact on the natural or built environment and social or economic impact in the locality*

The proposed development will be sympathetic to the historic character of The Rocks and will contribute positively to the surrounding built environment. The use of the site for hotel and retail purposes aligns with surrounding uses within the precinct. The proposed uses and public domain works will result in improved social and economic impacts through increased activity and vibrancy in this part of The Rocks.

Overall, it is considered the proposed variation to the SCRA Scheme will result in a superior outcome compared to an alternative scheme that could be achieved in accordance with the existing controls.

(c) *general planning and design principles for the Sydney Cove Redevelopment Area*

The planning and design principles for the Sydney Cove Redevelopment Area have been addressed through a comprehensive assessment of the matters for consideration listed within the Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005 (REP). Each of the relevant controls has been summarised below:

- **Biodiversity, ecology and environment protection:** The proposed development includes a range of sustainability initiatives, including a target to achieve a minimum 4-star NABERS Hotel Energy rating and a 3½ star Water Rating. The redevelopment of the site provides a unique opportunity for a much more sustainable built form with enhanced landscaping, green space, water sensitive urban design and ‘greener’ technology compared to the current building on site.

- **Public access to, and use of, foreshores and waterways:** The proposal will maintain and increase public access to and from the foreshore, including improvements to the existing connections from Cambridge Street.
- **Foreshore and waterways scenic quality:** The scale, form, design and siting of the proposed development has been based on a comprehensive analysis of the site and its context. The proposal will make a much more positive contribution to the streetscape and setting of The Rocks compared the existing built form on the site.
- **Maintenance, protection and enhancement of views:** As demonstrated in the preliminary Visual Impact Analysis (Appendix C), the proposal does not disrupt or minimise any iconic views within The Rocks precinct, and more broadly the visual impacts of the proposal are reasonable.

Overall, it is considered that the proposal satisfactorily address each of the relevant provisions contained within the deemed SEPP and accordingly, the proposed development is consistent with the general planning and design principles for the Sydney Cove Redevelopment Area.

4. SUMMARY AND CONCLUSION

This report has been prepared in support of a proposed amendment to the SCRA Scheme and in conjunction with an SSD application for the redevelopment of 35-75 Harrington Street, The Rocks.

The proposed variation is considered reasonable and will result in a positive outcome for the site. It will result in several public benefits, which are detailed above in this request.

Accordingly, it is recommended the Secretary prepare a draft variation to the SCRA Scheme in accordance with the information provided within this report (including the amended Building Site Control Drawing) and the relevant provisions of the *Environmental Planning and Assessment (Sydney Cove) Savings and Transitional Regulation 1999*.

DISCLAIMER

This report is dated 12 October 2022 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of FEO (**Instructing Party**) for the purpose of Draft SCRA Scheme Variation Request (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A

DRAFT SCRA AMENDMENT DRAWING

APPENDIX B

DESIGN PACKAGE

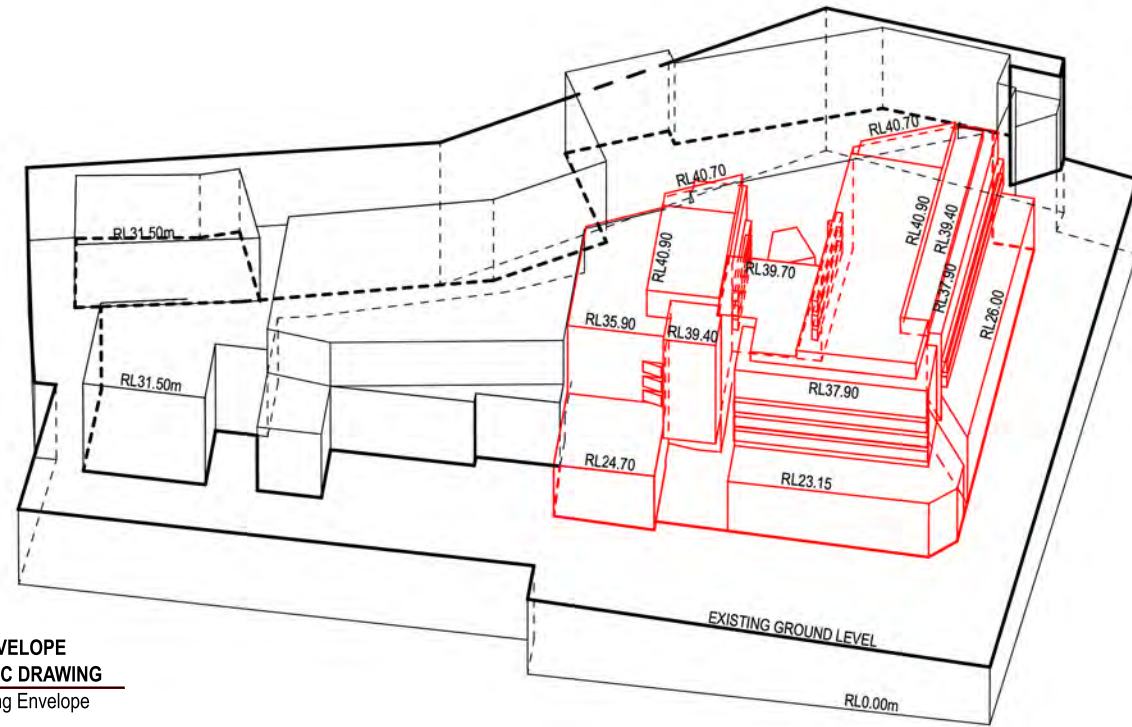
APPENDIX C

PRELIMINARY VISUAL IMPACT ANALYSIS

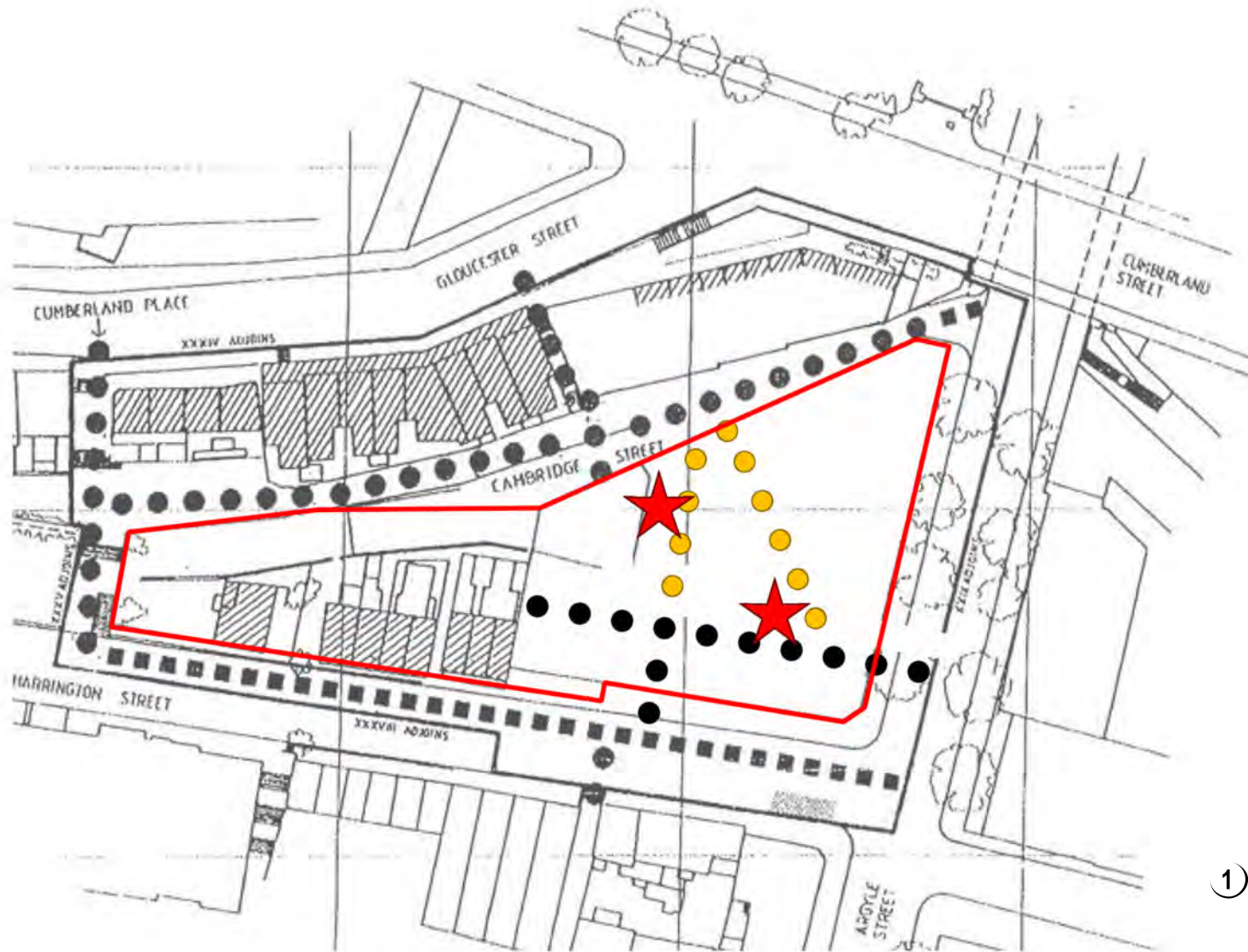
APPENDIX D

PRELIMINARY HERITAGE ANALYSIS

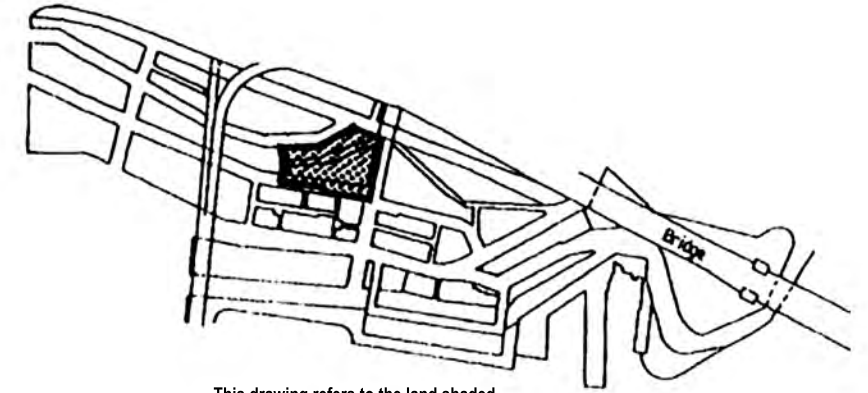




2 BUILDING ENVELOPE
AXONOMETRIC DRAWING
Revised Building Envelope



1 BUILDING SITE PLAN



This drawing refers to the land shaded

LEGEND

SITE BOUDARY

EASEMENT

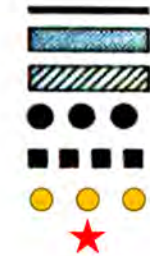
HISTORIC BUILDINGS

PEDESTRIAN ROUTE

VEHICLE ROUTE

NEW PEDESTRIAN ROUTE

NEW PUBLIC LIFT



PERMITTED USES

COMMERCIAL

RESIDENTIAL

SPECIAL

Special Note:

The only structures which may be added above the RL 35-50 zone are those associated with the lift overrun and motor room

The only structures which may be added above the Rendezvous Hotel are PV Panels and the like for like replacement of existing plant equipment.

As delegate of the Minister of Planning, under delegation dated 28 February 2016, pursuant to clause 9 of the *Environmental Planning And Assessment (Sydney Cove) Savings and Transitional Regulation 1999*, under the *Environmental Planning and Assessment Act 1979*, approve the variation to the Prescribed scheme, described by the control drawing

Anthea Sargeant
Executive Director
Key Sites and Industry Assessments

The general controls as shown on this drawing are subject to the refinement of detailing relation to dimensions, easements, usages, open spaces and means of circulation and the sites shall be subject to such further conditions in relation to architectural details, financial considerations, staging and timing an system of approval as the Authority may deem necessary and make known prior to the sites being offered for development.

BUILDING SITE CONTROL DRAWING

XXXVI(2)

DEPARTMENT OF PLANNING AND ENVIRONMENT



35-75 Harrington Street, The Rocks
SCRA Control Envelope Amendment
10/10/2022

Envelope

Statutory Controls

Development of the site is governed by the Sydney Cove Redevelopment Authority Scheme (SCRA), which refers to sites within The Rocks precinct.

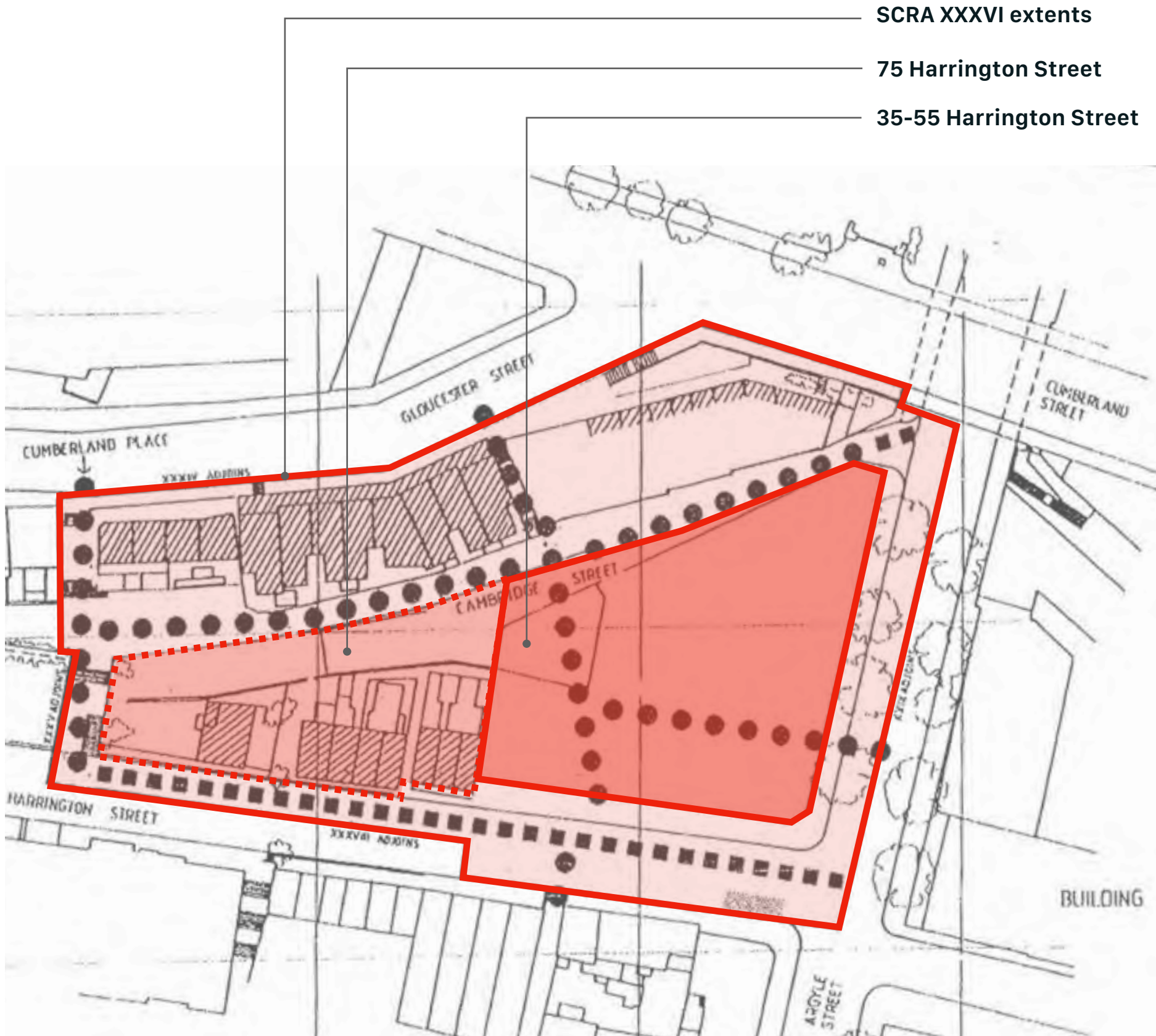
The scheme divides the precinct into blocks in order to provide a detailed building envelope designated for each block. Currently, the SCRA envelope remains the primary control for the site, which is located within the XXXVI (1) Block.

The diagrams below seek to clarify the zones of XXXVI pertinent to the subject sites, namely:

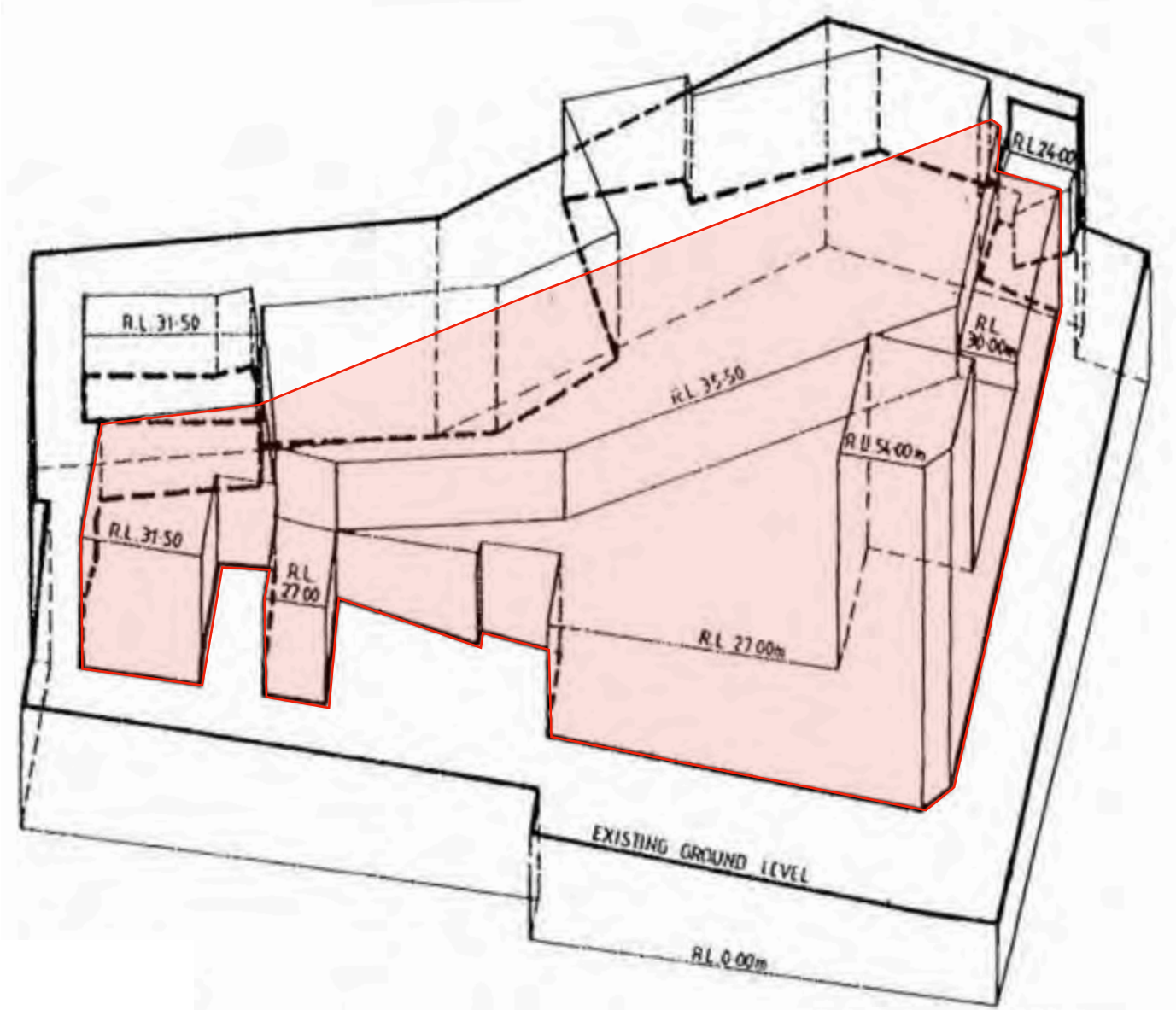
- 75 Harrington Street.** The Rendezvous Hotel including 61 rooms and 7 renovated historically listed cottages.
- 35-55 Harrington Street.** An existing mixed use development 'affectionately' referred to as the Clocktower Square, including 5 levels of commercial over 2 levels of retail and 2 levels of car parking.

This application seeks an amendment to the SCRA envelope to:

- Resolve minor existing discrepancies between the rendezvous hotel and the SCRA envelope, and
- Capture the new building envelope relative to the proposed hotel on the 35-55 mixed-use site.



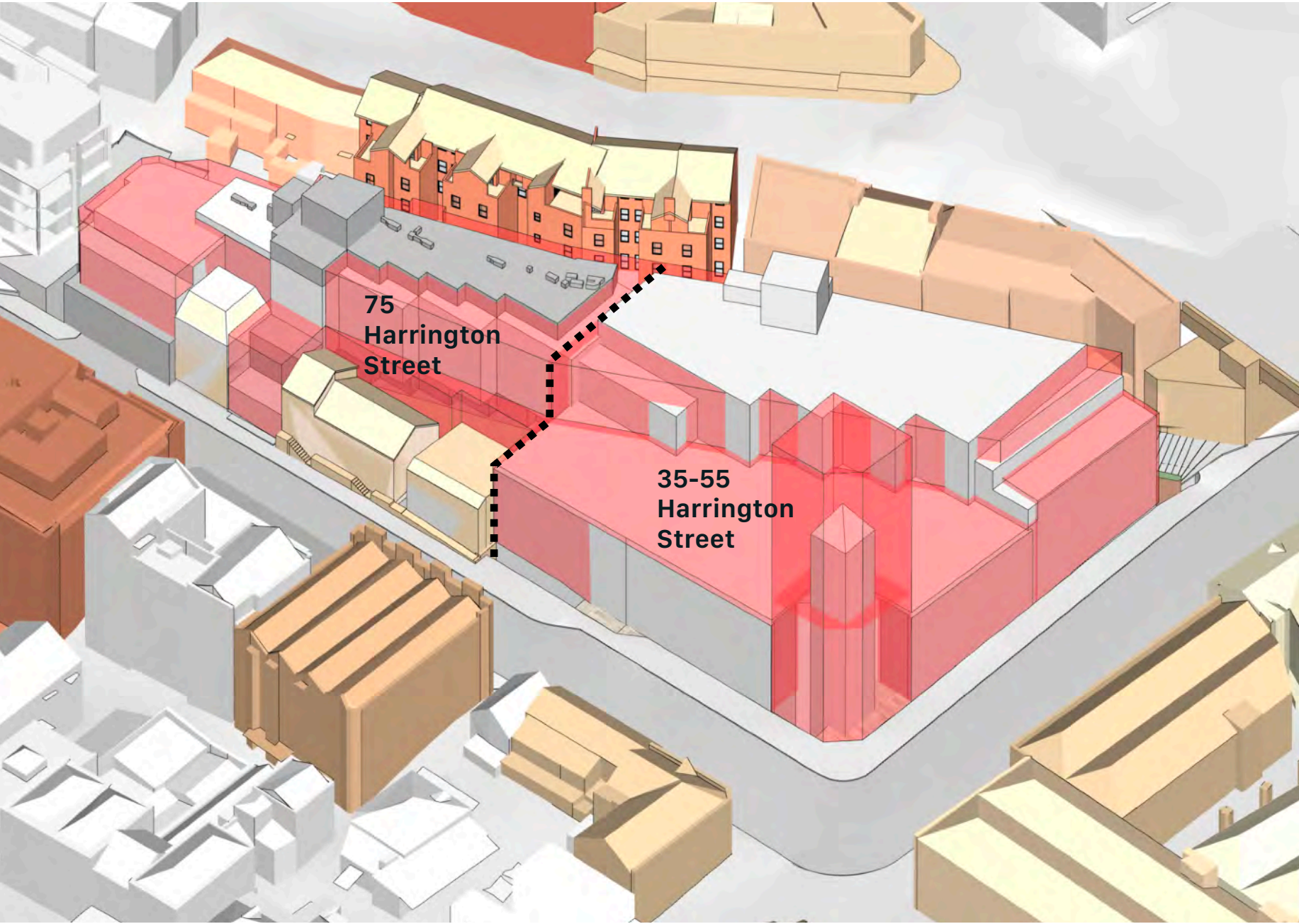
XXXVI(1) excerpt BUILDING SITE PLAN illustrating SCRA block extents and the pertinent envelope amendment sites.



XXXVI(1) excerpt BUILDING ENVELOPE AXONOMETRIC illustrating SCRA block extents and the pertinent envelope amendment sites. Note: the Heritage listed properties are omitted from the envelope.



Northeast aerial perspective identifying 35-55 Harrington and 75 Harrington Street in context.



The transparent red masses are the existing SCRA envelopes for both sites. This diagram is intended to identify some of the discrepancies between the SCRA and the existing buildings. It is noteworthy that the current SCRA controls only permit flagpoles and lift motor rooms above the SCRA control envelope.

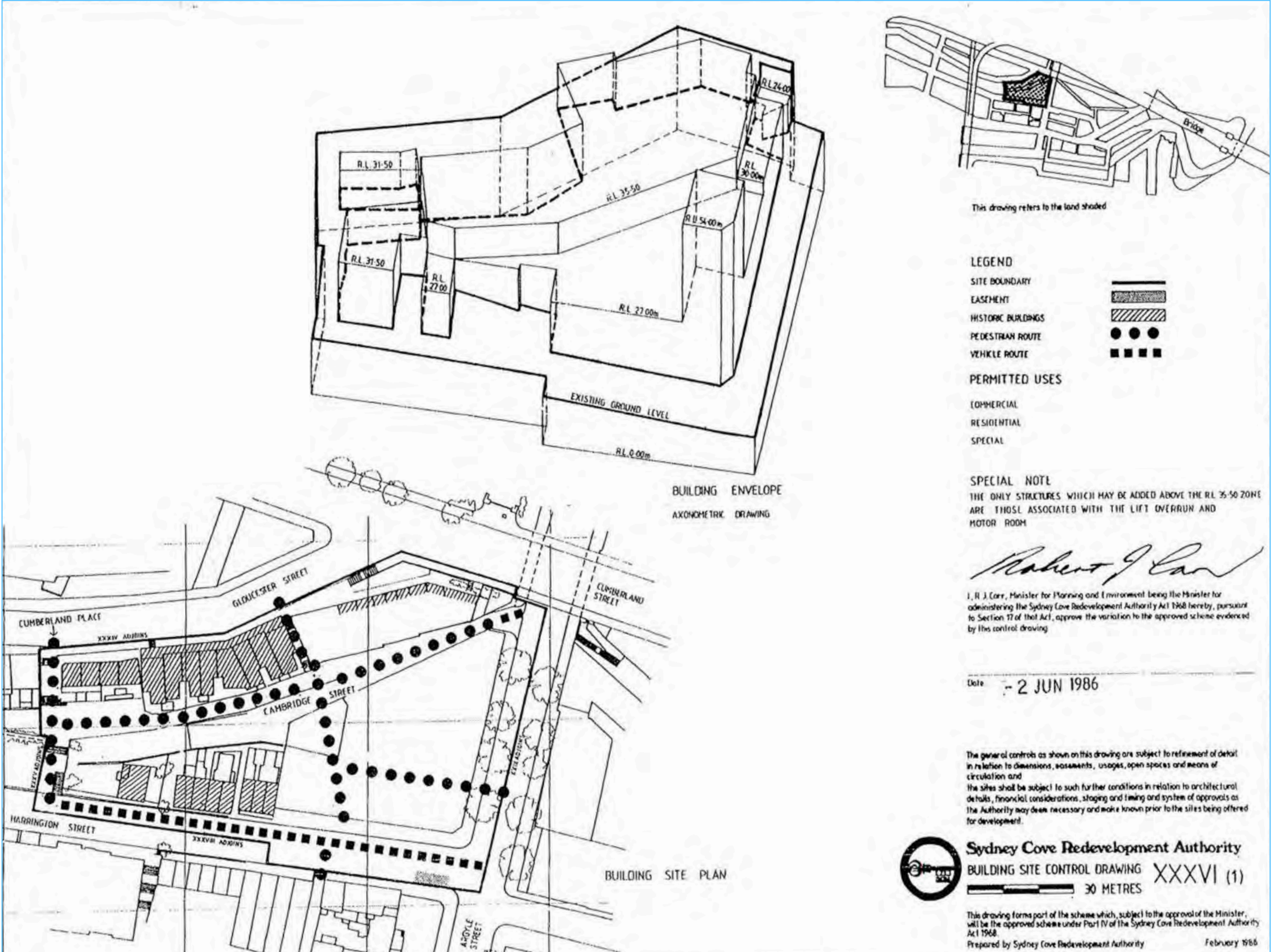
Envelope
Existing Controls
SCRA XXXVI (1)



Perspective from intersection of Argyle and Harrington



Northeast aerial Perspective



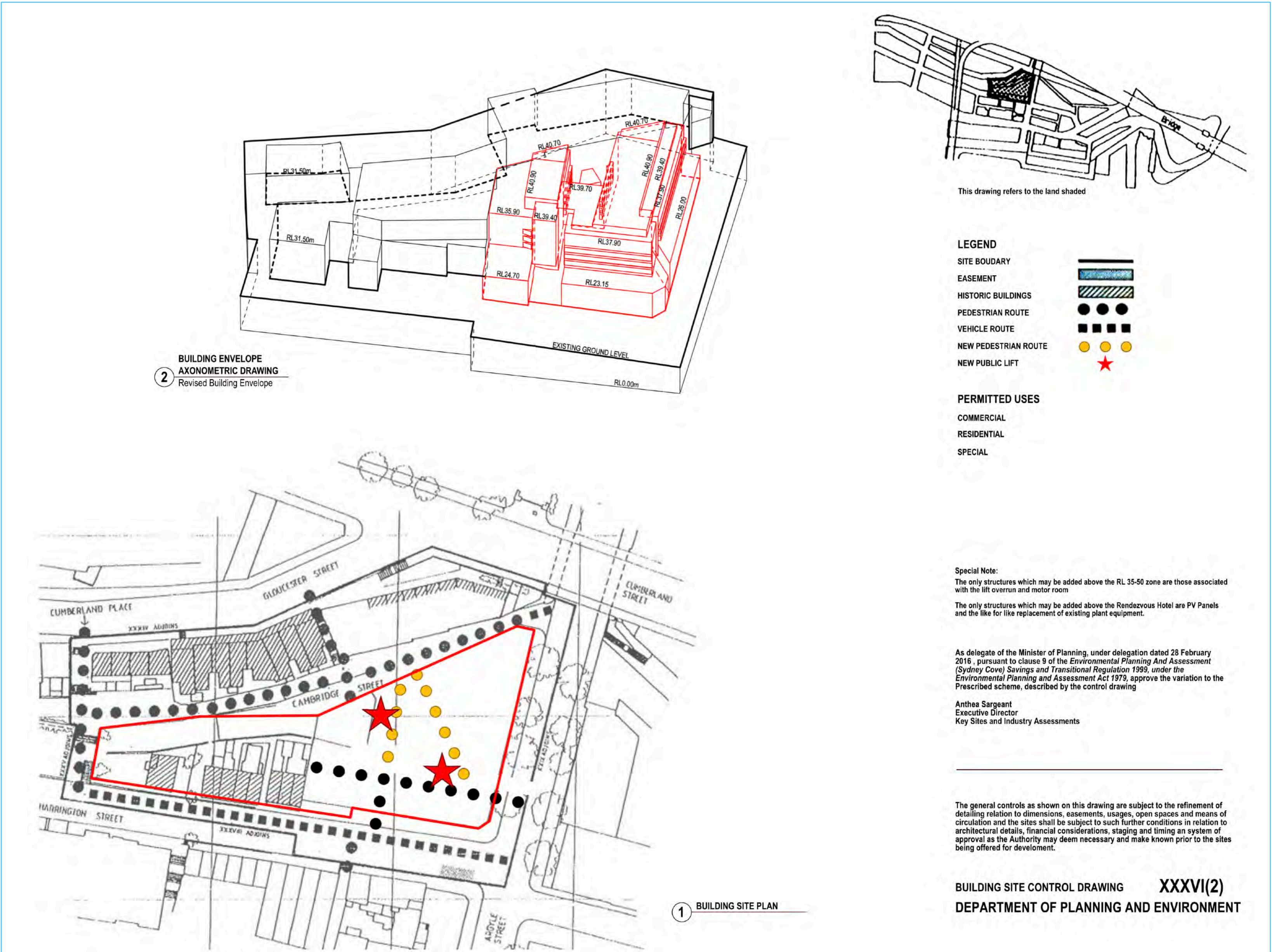
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Proposed Controls
SCRA XXXVI (2)



Perspective from intersection of Argyle and Harrington

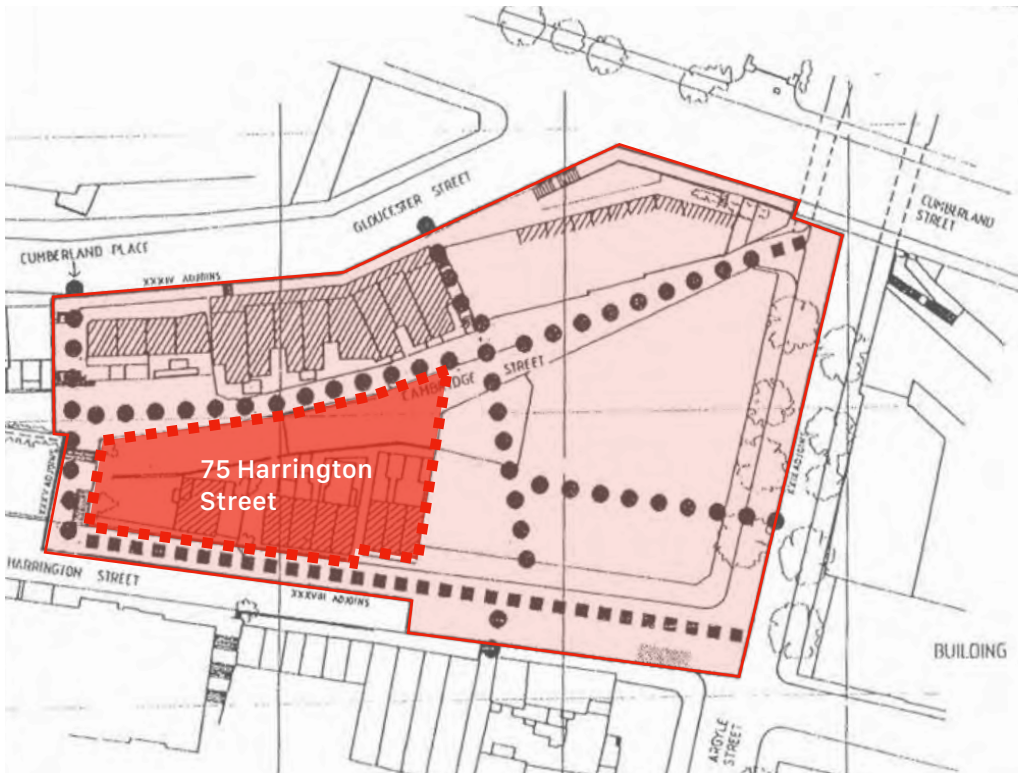


Northeast aerial Perspective



75 Harrington Street

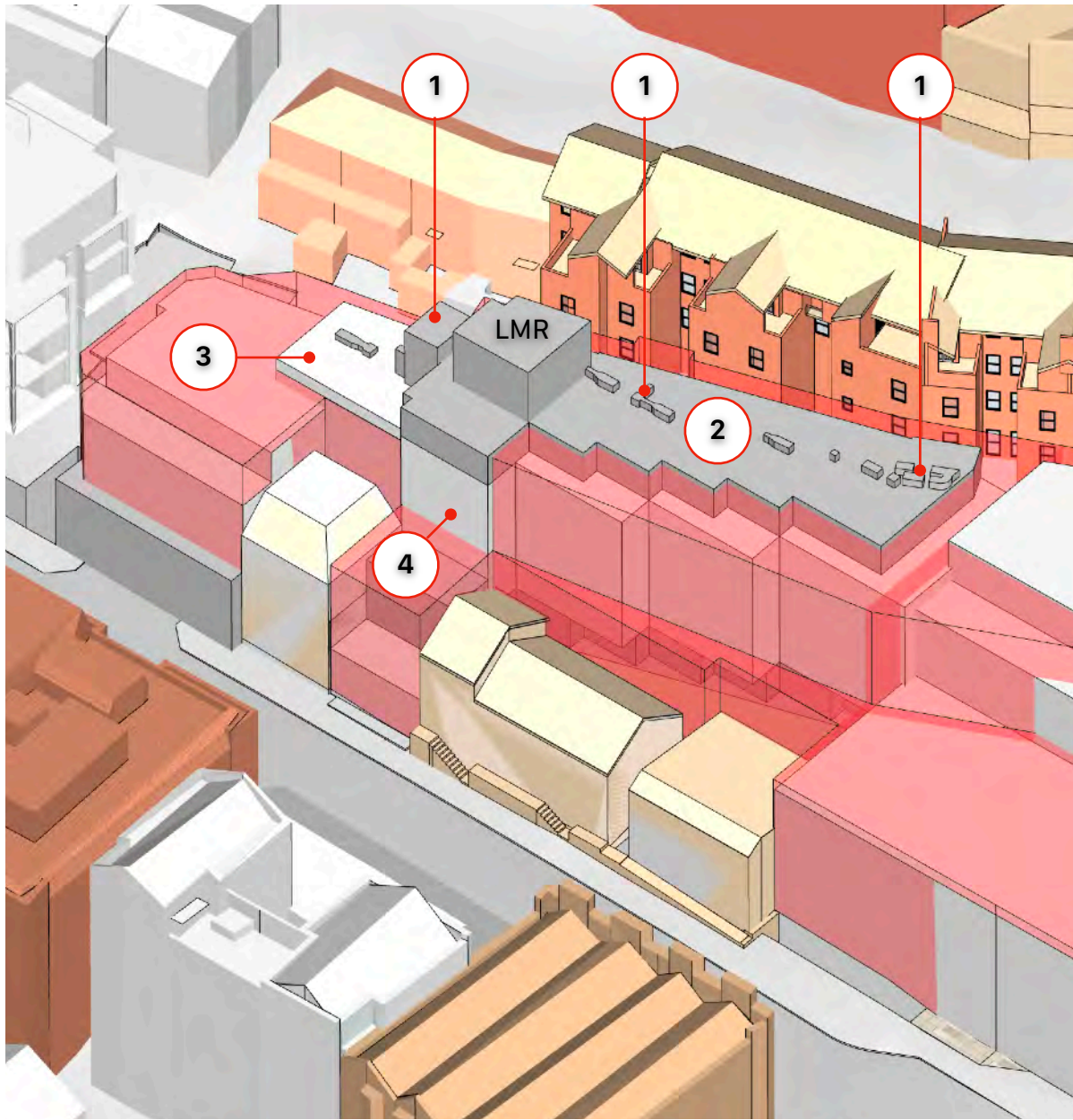
Envelope Anomalies



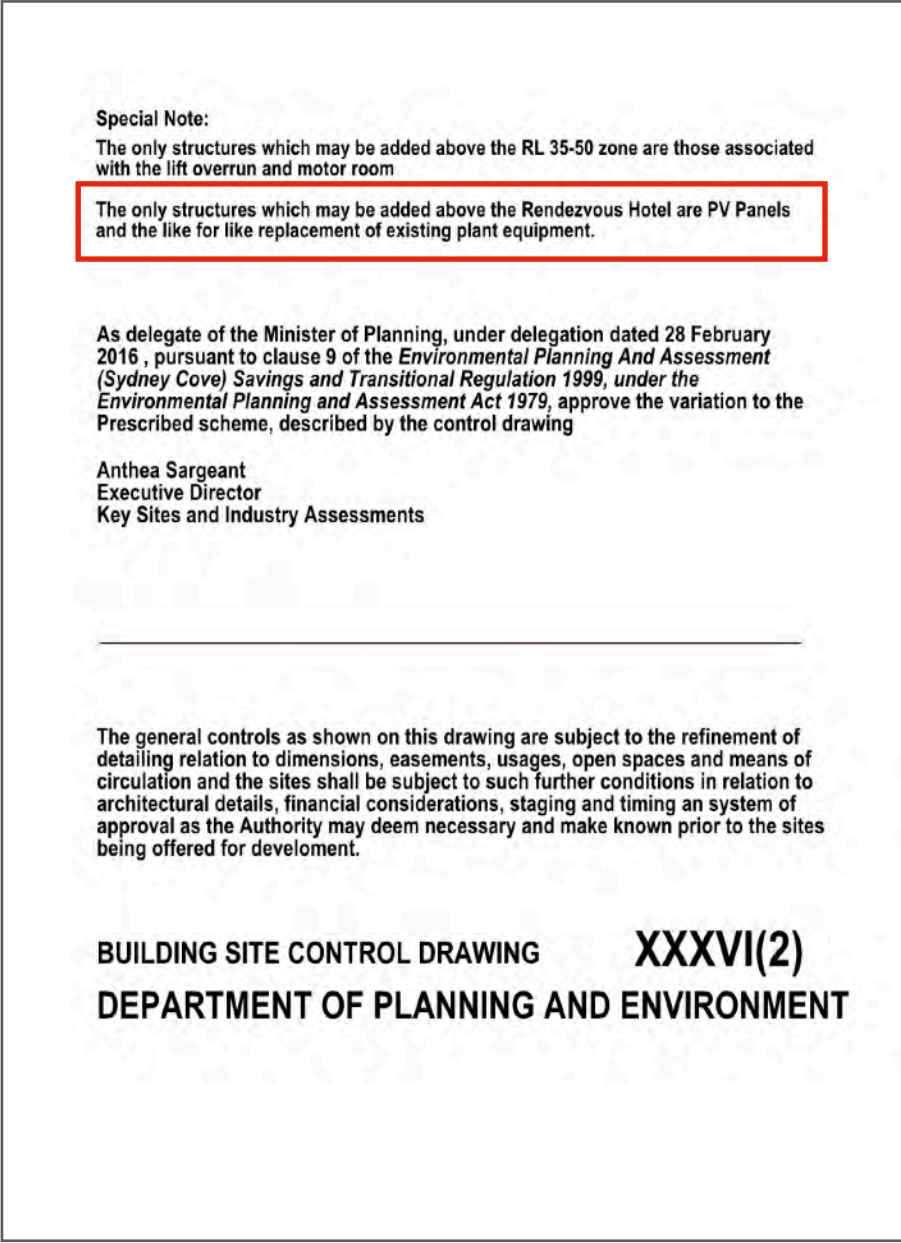
Part of this envelope submission seeks to address a number of existing condition discrepancies between the SCRA envelope and the existing fabric of 75 Harrington Street. Those discrepancies being:

- 1. Various existing mechanical plant equipment enclosures and ducts
- 2. Hotel parapets north of the LMR
- 3. Level 4 slab and parapets south of the LMR
- 4. The east elevation of the central form

* Note: Lift motor rooms are omitted from control envelope consideration.



Discrepancies between existing SCRA control envelope (shown in red) and the existing building (white and grey).



Excerpt of the revised Controls, highlighting additional 'Special Note', referring to those identified elements outside of the Control Envelope.

Satellite aerial

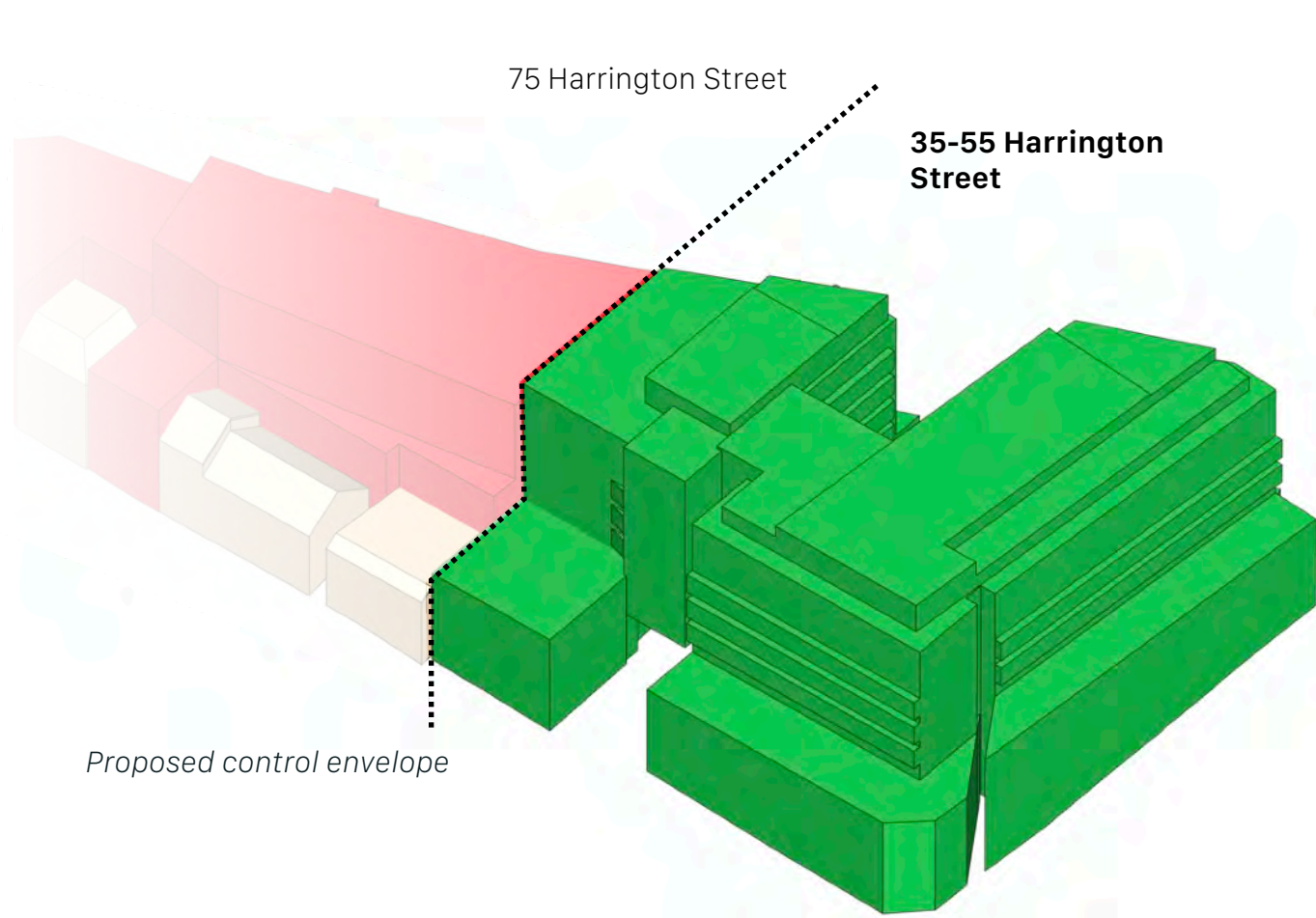
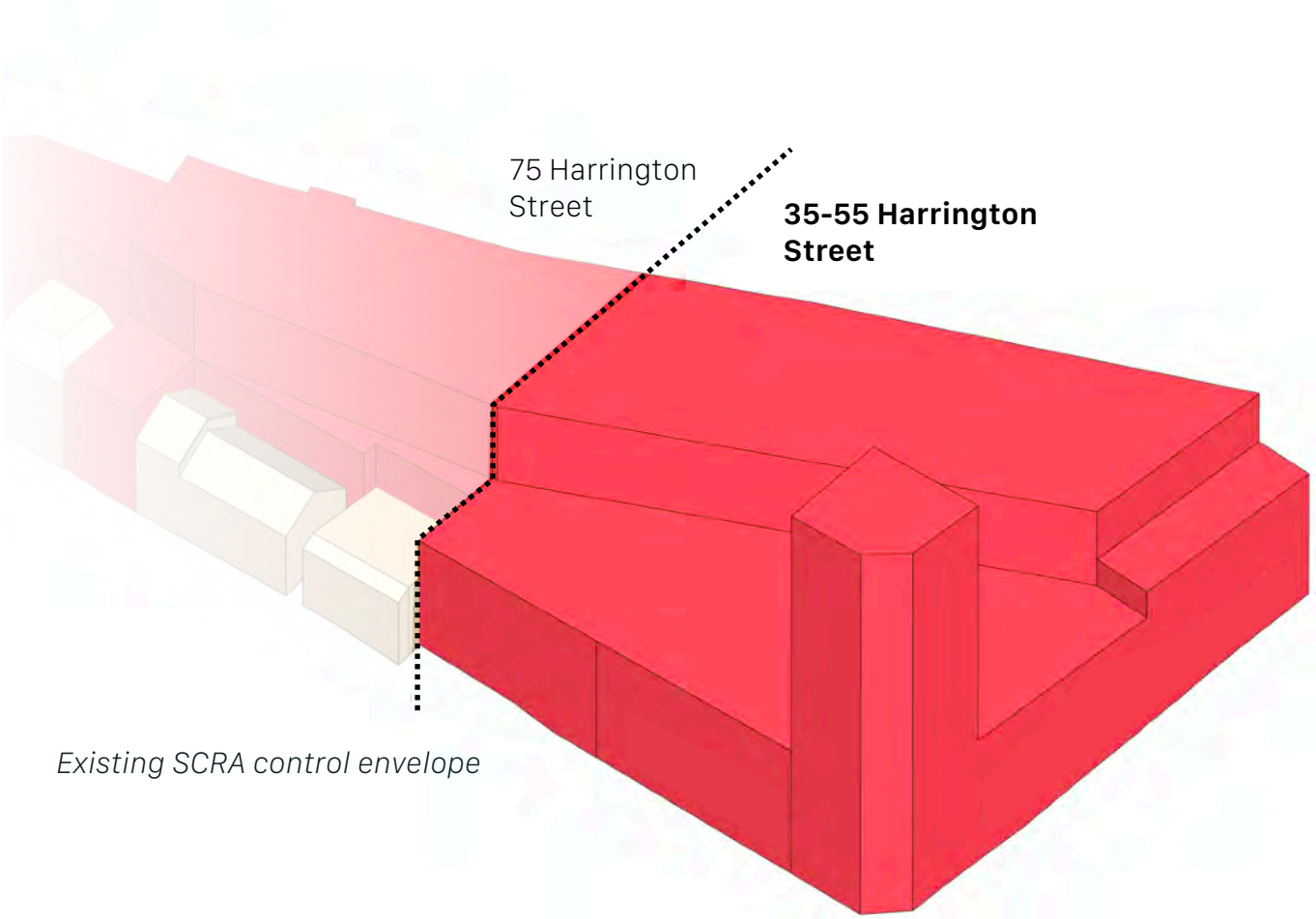


Aerial perspective

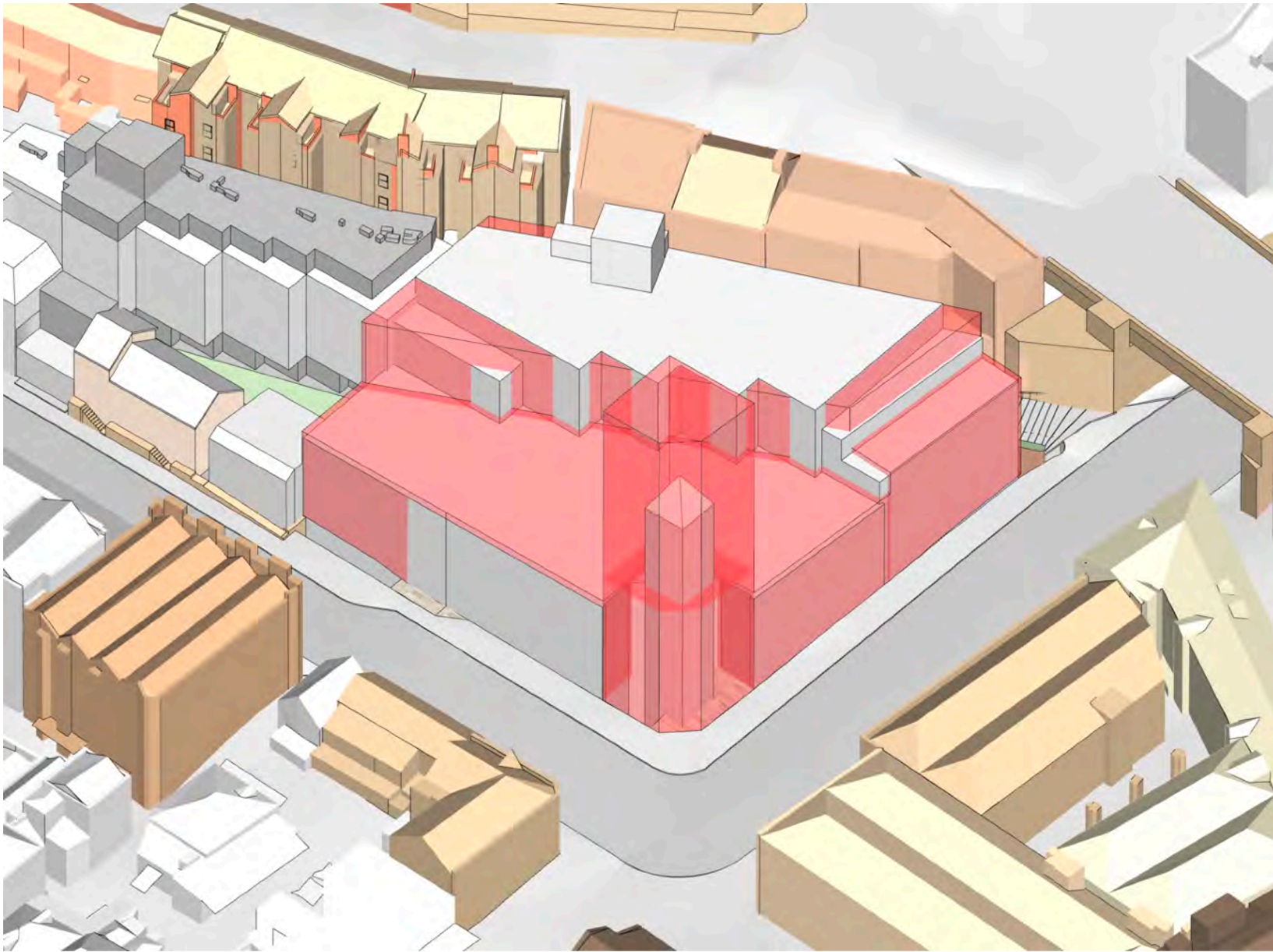


Photograph of additional rooftop plant equipment and parapet above SCRA control envelope





- More significant modifications to the control envelope are proposed for 35-55 Harrington Street. The envelope proposed is effectively shrink-wrapped around the proposed reference building design for The Quincy Hotel; an approximately 200 room, 4 star hotel with retail podium, and rooftop bar.
- The proposed envelope is area and volume neutral with the existing SCRA and seeks to resolve:
- **Activation** A massing that better responds to the sites inherent potential for activation to all street frontages
 - **Reinstated Heritage Morphology** A heritage-morphology-sensitive response to street address forms, reinstating the heritage character and scale of The Rocks streetscape
 - **Setback Podium** A podium form that is recessive and set back from heritage-sensitive Argyle and Harrington streets
 - **Cambridge Street amenity** including the provision of a new large courtyard with improved solar and sky view access
 - **Through-site Links** The provision of intuitive and vibrant through site links, extending the permeable and active ground plane nature of The Rocks further west
 - **Public Spaces** The provision of three new public spaces, located on all street frontages for variety of experience including day and year round solar amenity



Existing SCRA control envelope relative to existing Clocktower Square development.



Proposed control envelope relative to reference building design

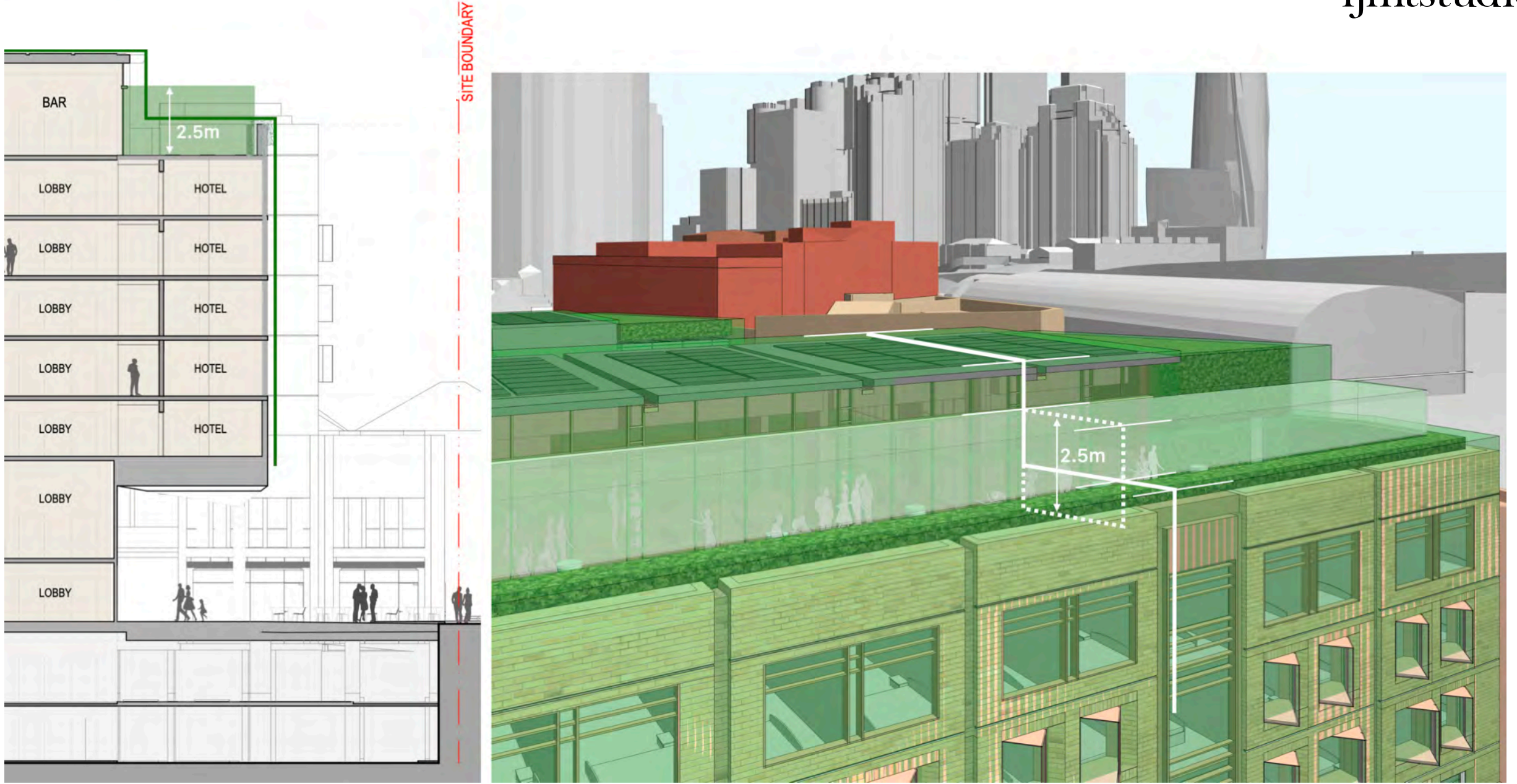
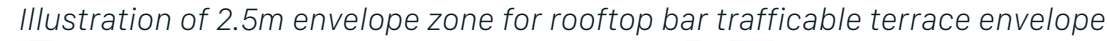
35-55 Harrington Street

The original SCRA was defined in 1986 and seemingly 'shrink-wrapped' around the Rendezvous Hotel and Clocktower Square sites.

The proposed control envelope has been 'shrink-wrapped' around the proposed building design, in a similar protocol to the original SCRA.

The exception is to the rooftop bar external traffic-able terraces. Where the SCRA controls note only lift motor rooms and flagpoles are omitted above the control envelope, any rooftop bar terrace feature (including loose furniture, planting, screens, umbrellas et al) are required to be included within the control envelope.

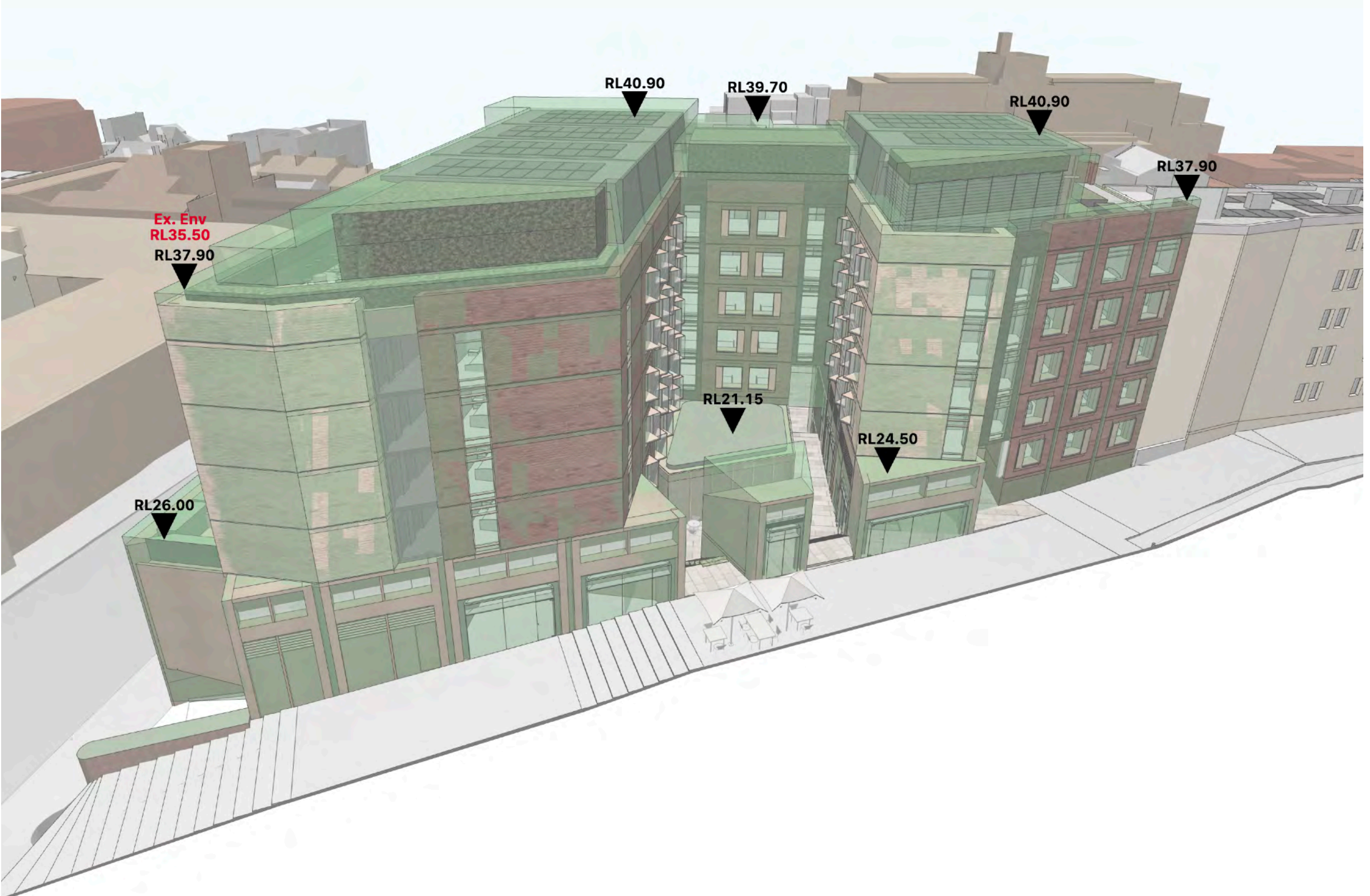
The rooftop bar is a cold shell provision and a detailed fit out strategy is not available. We have therefore made an allowance for 2.5m in the proposed envelope to account for future terrace features. This zone is not intended for any GFA allocation and has been indicated with a different shade of colour in the envelope drawings to reflect this intention.



Northeast perspective of the proposed control envelope 'shrink-wrapping' the proposed building design



Western perspective of the proposed control envelope 'shrink-wrapping' the proposed building design



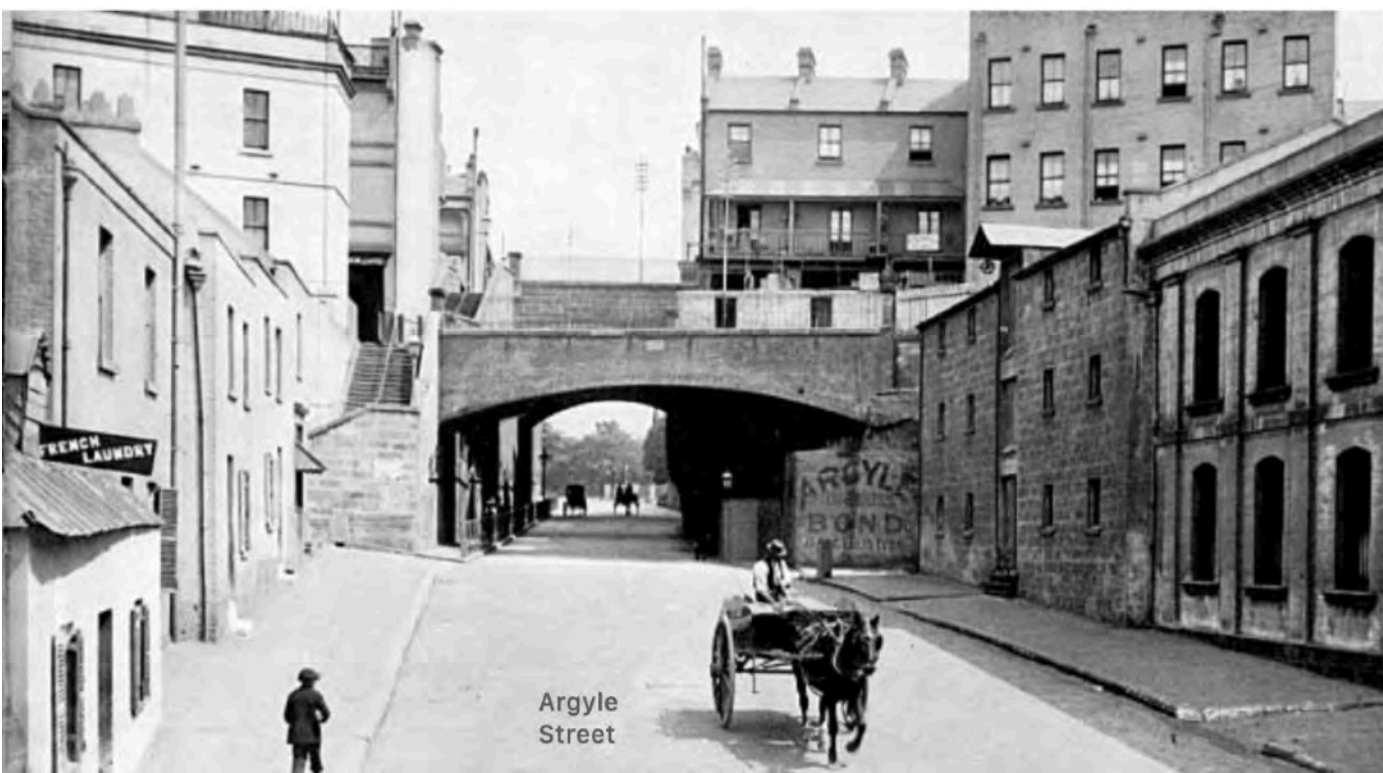
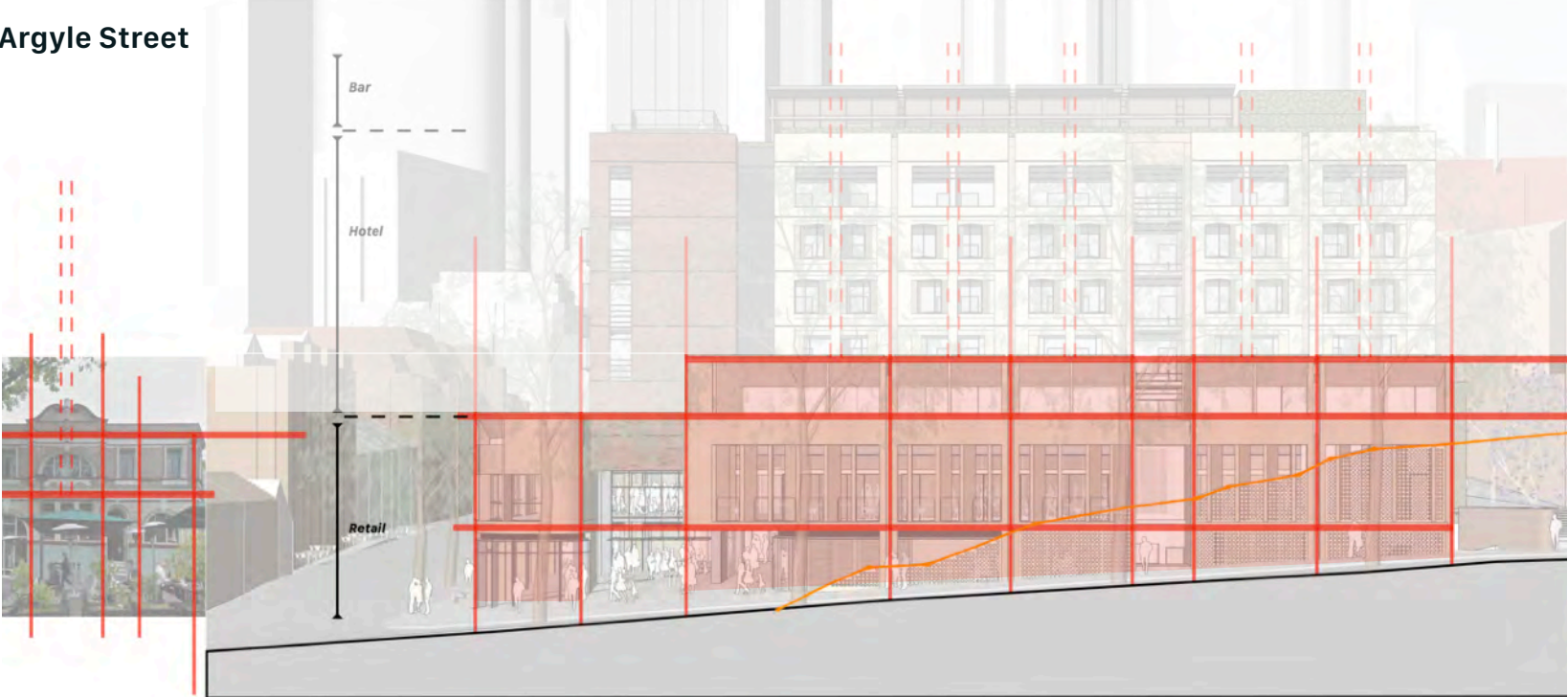
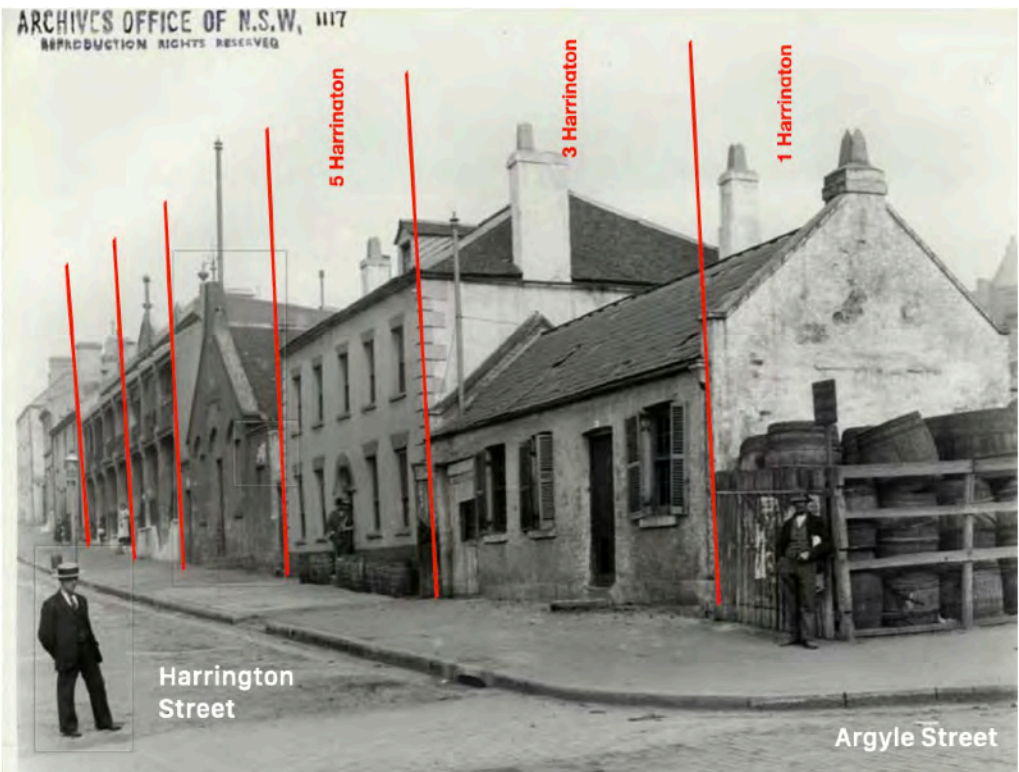
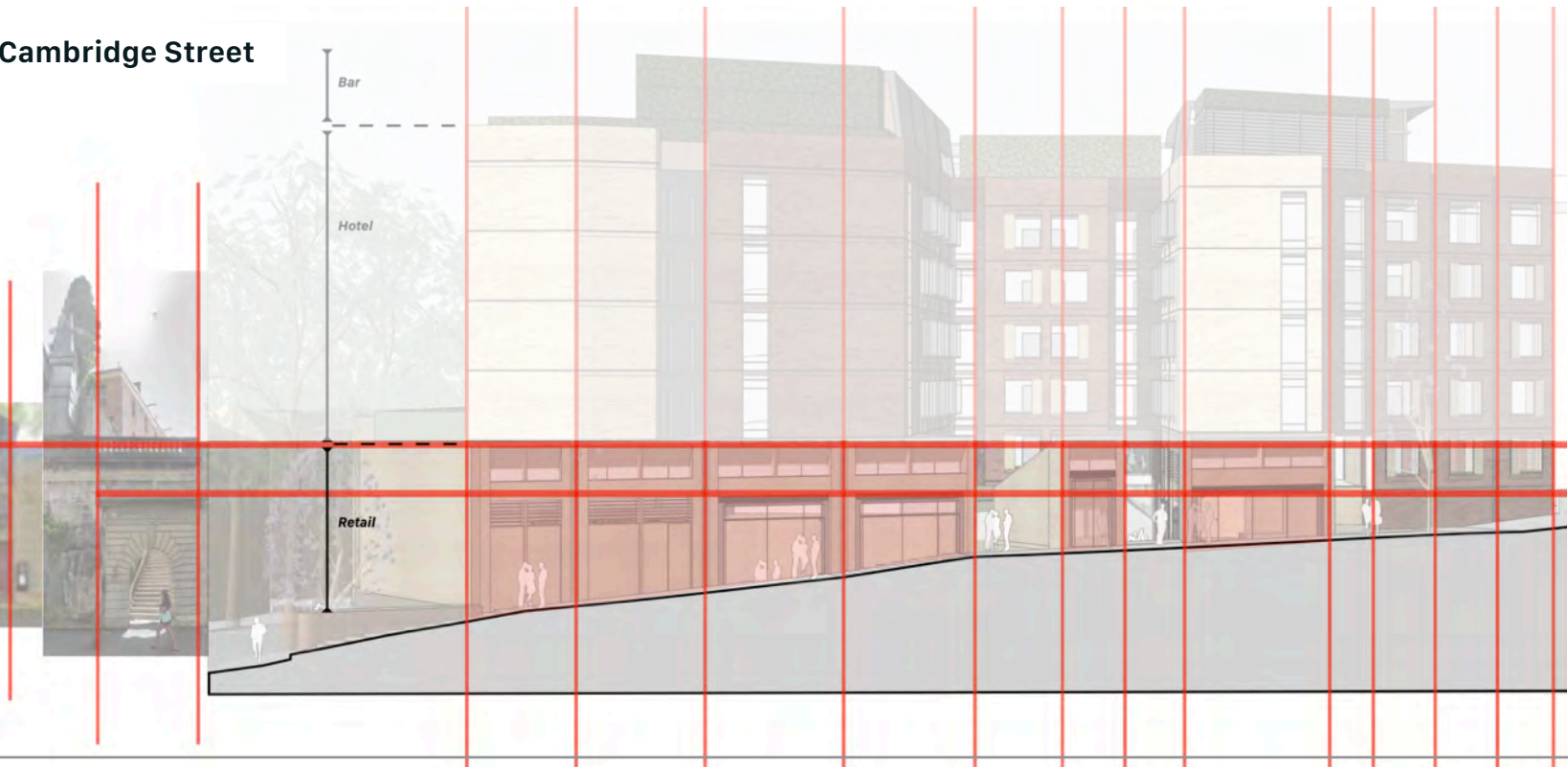
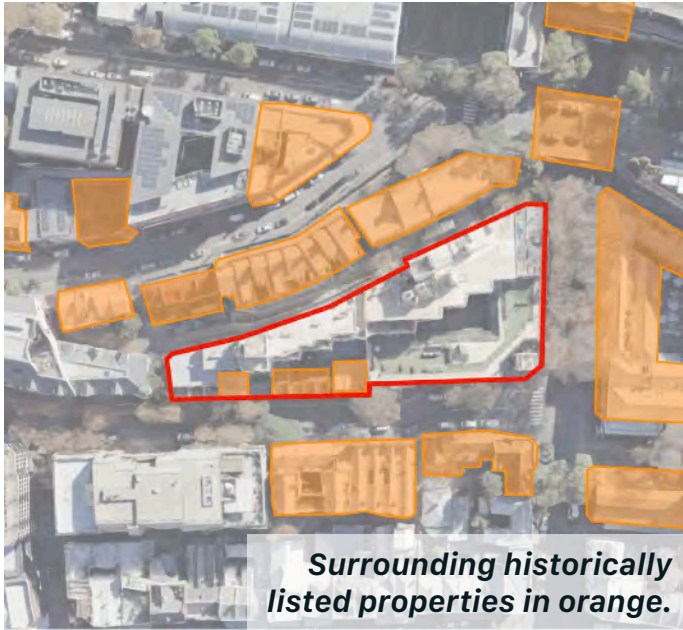
35-55 Harrington Street

Street Wall Elevation Massing: Recalling Heritage Morphology, Scale & Grain

The site is surrounded by historically listed properties, including the Argyle Stores (former NSW town hall) to the north, the Argyle Cut to the north west, the Gloucester terraces to the west and the Harbour Rocks Hotel to the east.

The existing SCRA envelope presents a 4 story massing to these streetscapes, insensitive to the heritage scale and height established by these important surrounding buildings.

The proposed envelopes seek to restore the heritage-scaled streetscape setting, with story heights mimicking both the adjacent heritage developments and recalling the sites own heritage morphology.



35-55 Harrington Street

Podium and Roof Form Genesis

Podium Form

The podium form, housing the hotel rooms, sets back from Argyle and Harrington Streets to accentuate the aforementioned heritage street wall. The street wall in turn also acts as a screening element to reduce the perception of podium bulk when viewed from the streetscape.

To Cambridge street, the podium maintains the zero setback but is divided into slender, vertically proportioned volumes that echo the variety of widths and heights of the Gloucester street heritage terraces immediately opposite. The large courtyard at the thru-link convergence is a feature and increases the amenity of the courtyard, thru-links and Cambridge Street.

The podium heights maintain the prevailing podium height established within The Rocks, including a continuation of the Rendezvous Hotel height.

Protruding bay windows feature in the facades, providing oriented views to key tourism icons from inside the hotel rooms, and on the outside, create a playful composition of varying alternation and character. These bay windows are captured in the proposed control envelopes.

Roof Form

The top floor (L6) is a roof top bar with external traffic-able terraces to the east and north. The form expression is a nod to the prevailing roof-scape within The Rocks of skillion and mansard metal roofs. The jointing featured correlates with, and is an extension of, the hotel room facade modulation. The scale of the modulation reflects the scale of the heritage terrace character within The Rocks.

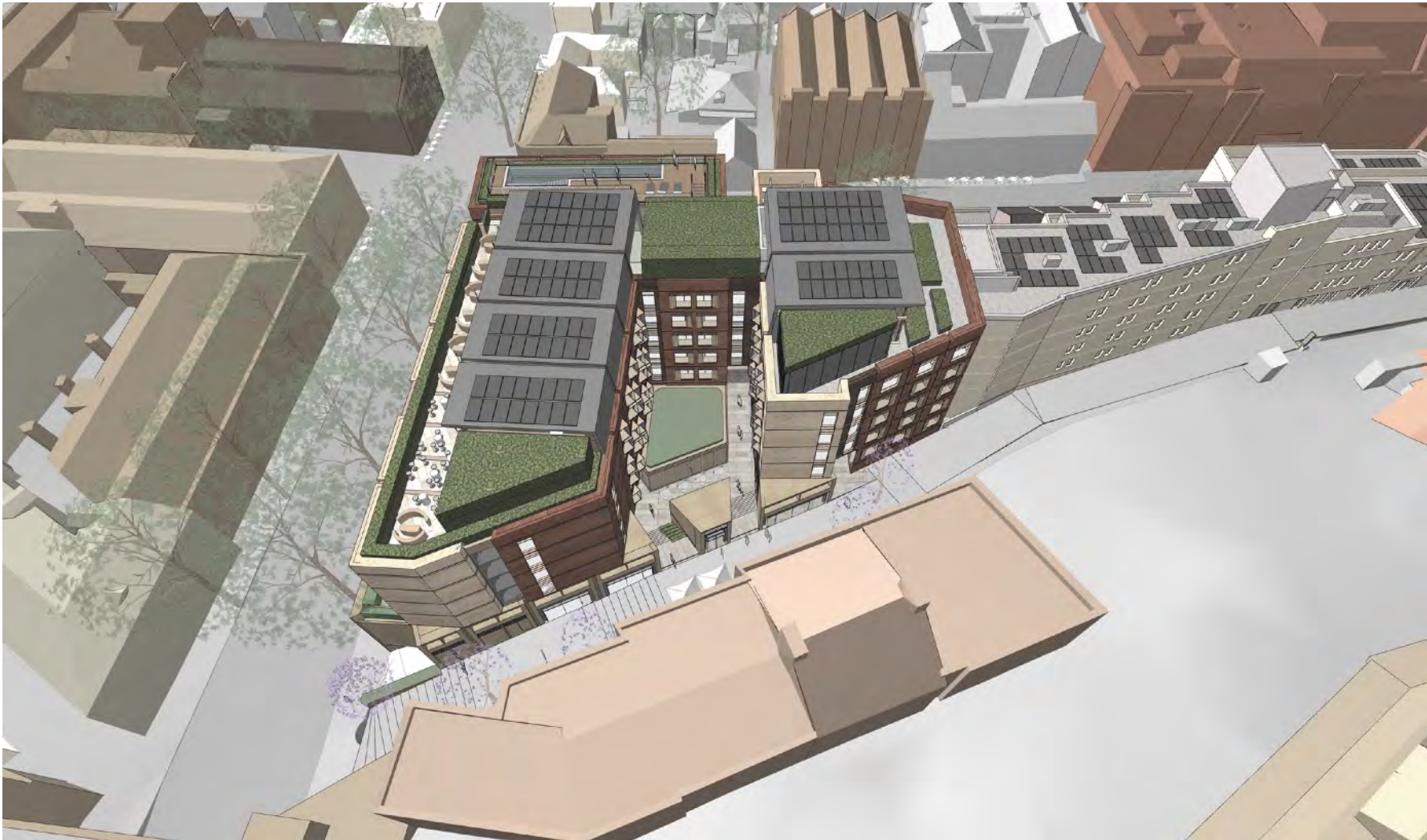
The predominate views of the roof are from the west (Cahill expressway) and distant views from the east around Circular Quay and the Opera House. The linear expression of the rooftop is compact and presents a varied roof level with lower green-planted roof areas. This presents a less continuous and smaller grain roof scape from those predominant views.

The roof massing is also set back from the level 5 east and north parapet such that it's largely hidden from adjacent ground-plane street views.

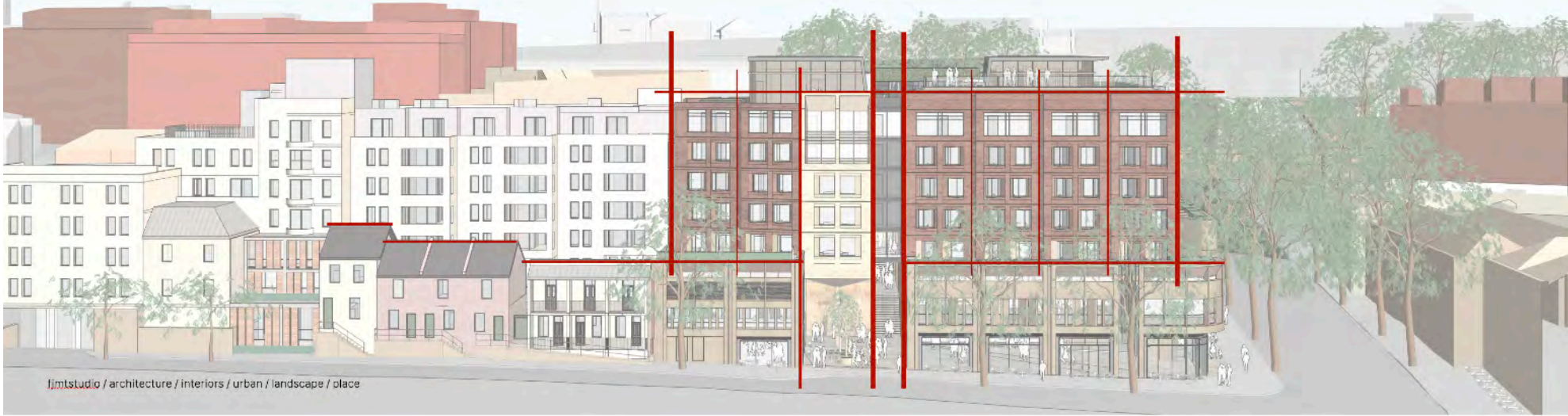
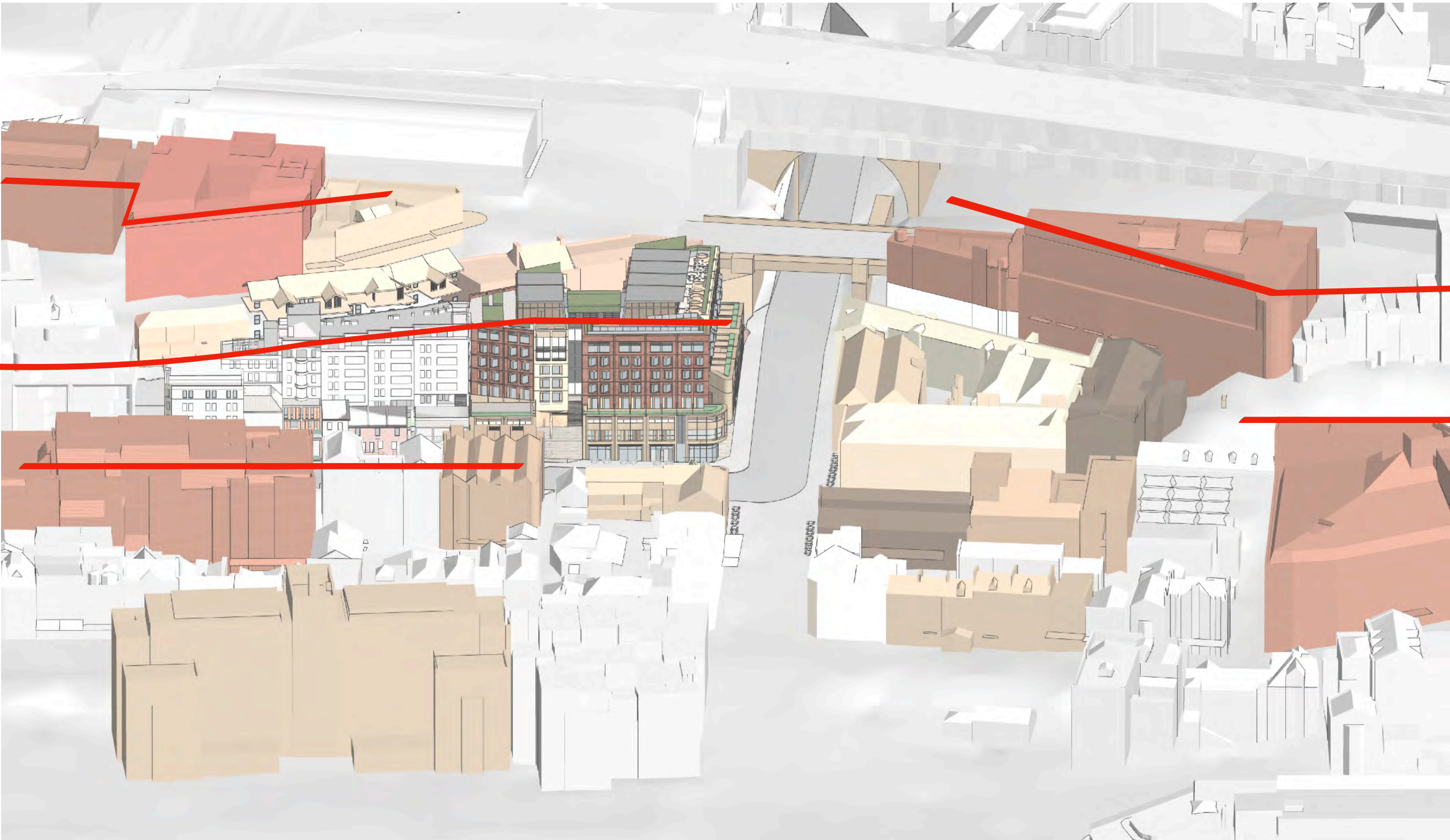
All rooftop plant areas and lift motor rooms have been designed to be wholly integrated within the architecture and proposed control envelope.



Eastern aerial perspective of the proposed roof form, which undulates in height, sensitive to views from the east and west



Western aerial perspective of the proposed reference design roof form with sedum roofs for biophilia and to further break up roof bulk perception



35-55 Harrington Street

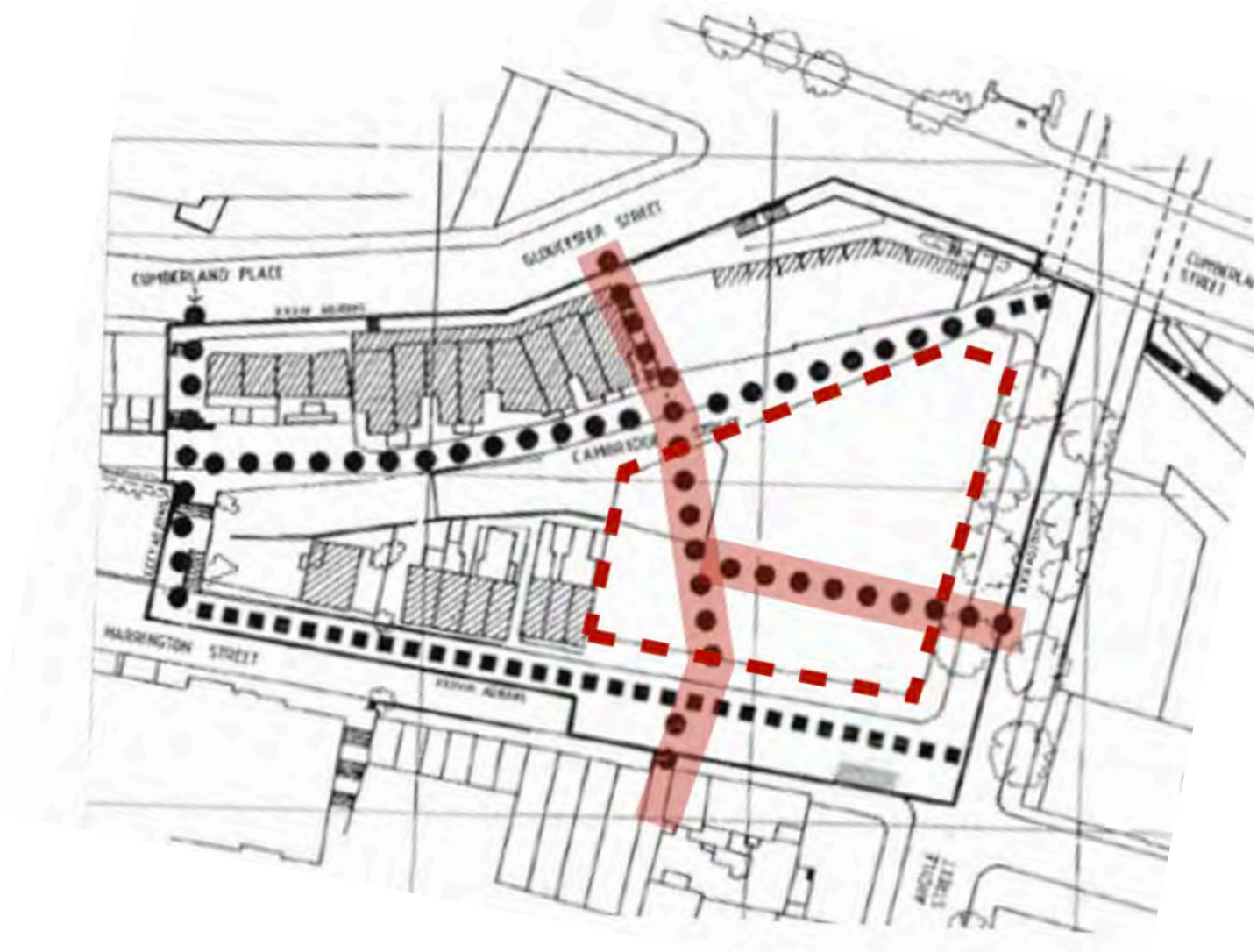
Reference Scheme Through-site Links and Wayfinding

The Reference Scheme ground plane features three through site links, all reflected in the revised control plan diagram. The east-west and north-south links are largely as per the previously nominated SCRA controls, however, there is a new diagonal link connecting Cambridge Street and the high traffic Argyle/Harrington intersection.

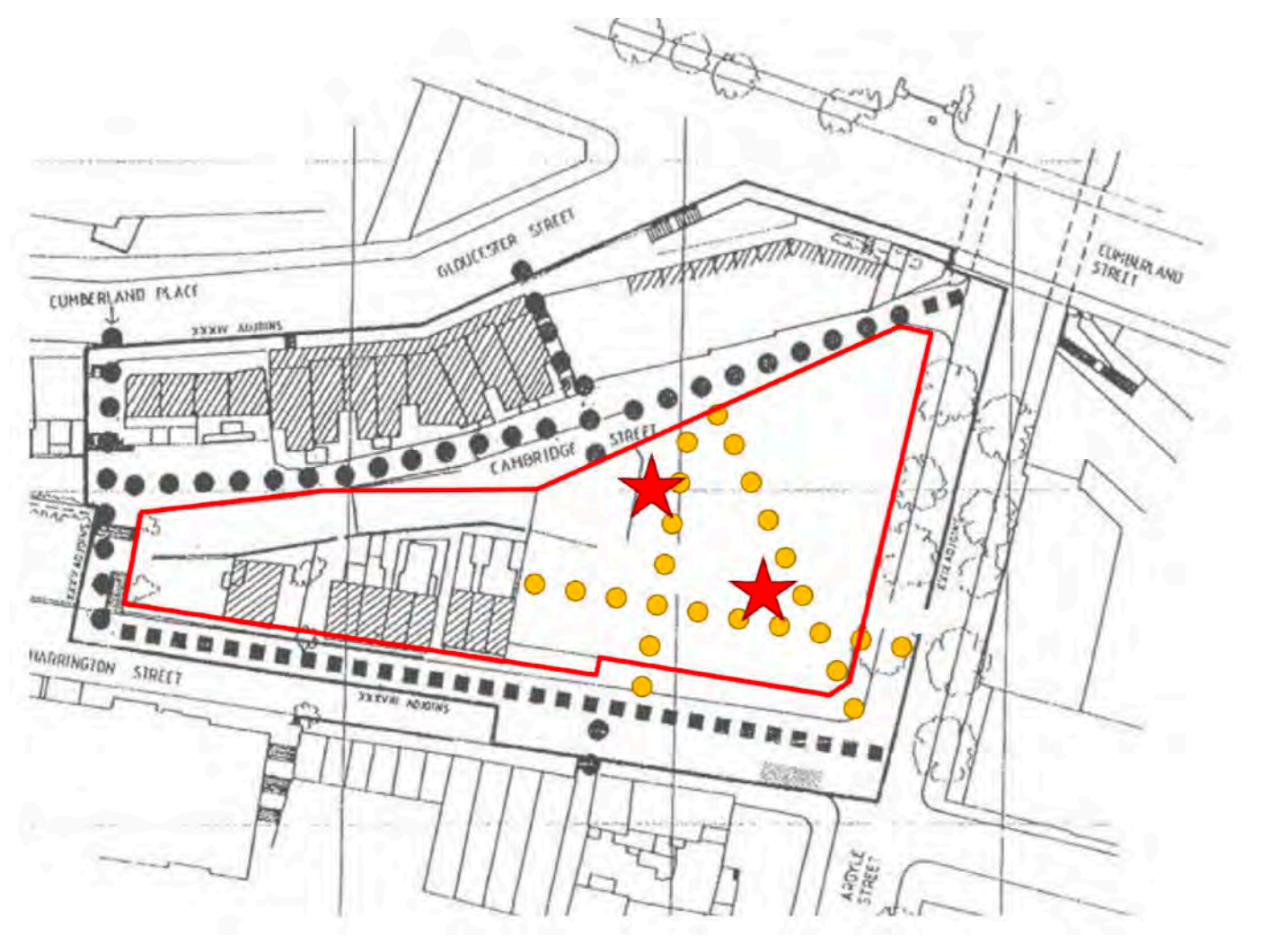
The thru-links converge at each of the three proposed new public spaces; the Meeting Place off Harrington, the Corner Place off the intersection, and Cambridge Place to the west. The public spaces are pushed to the boundary to maximise inherent solar amenity, and compliment the amenity and character of the through-site links.

Each of the through-site links will be vibrant and active links with retail and hotel activation and public spaces with vegetation and seating at either end.

There are 3 levels of cross fall across the site, with the topography rising from the northeast to southwest corners. Acknowledging access is a challenge throughout this part of the The Rocks, DDA through-site access strategies have been carefully considered with specialist input. Two DDA lifts are necessary to traverse the site and they have been located to be intuitively and clearly visible and accessible directly from where thru-links converge.

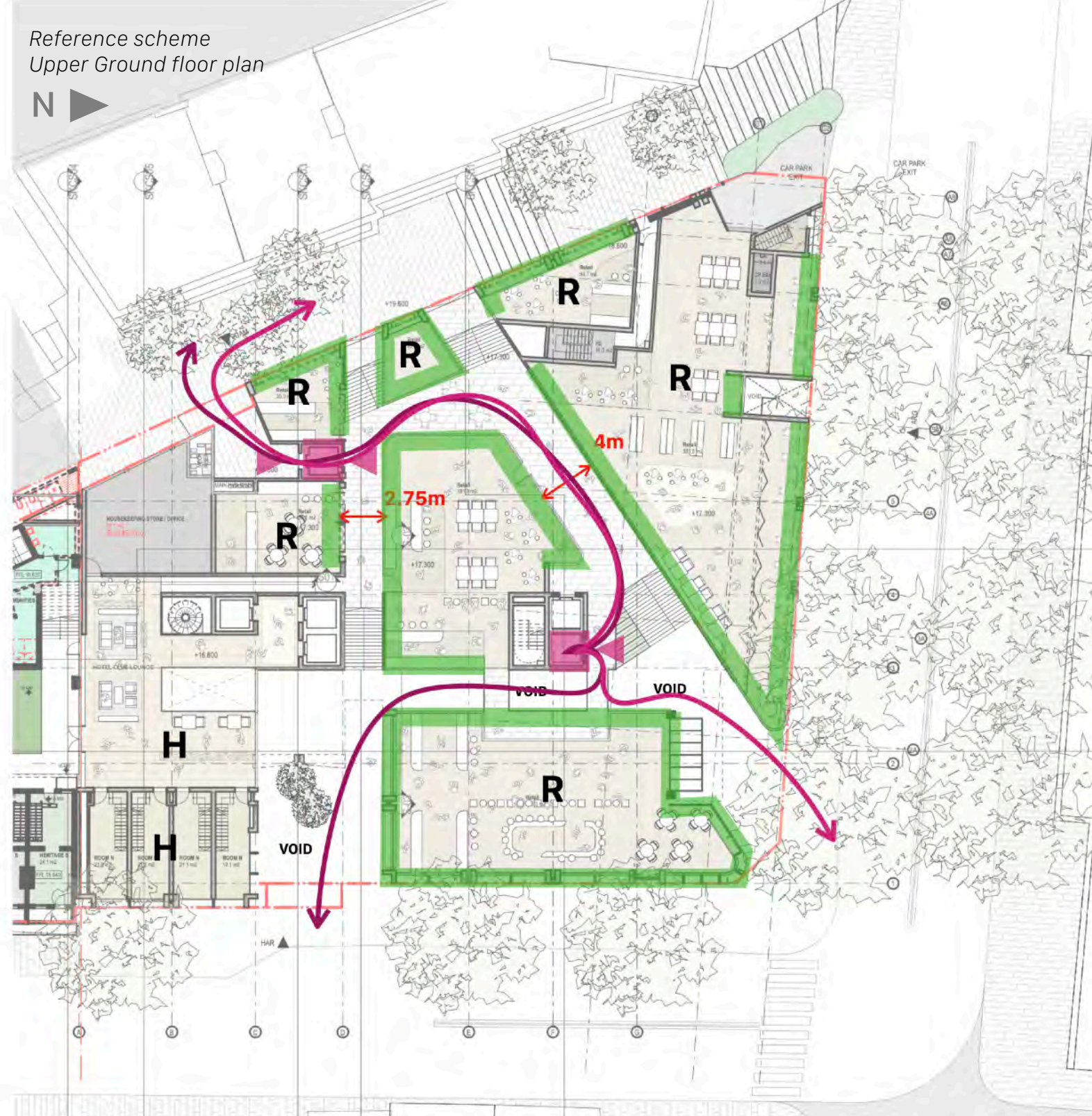
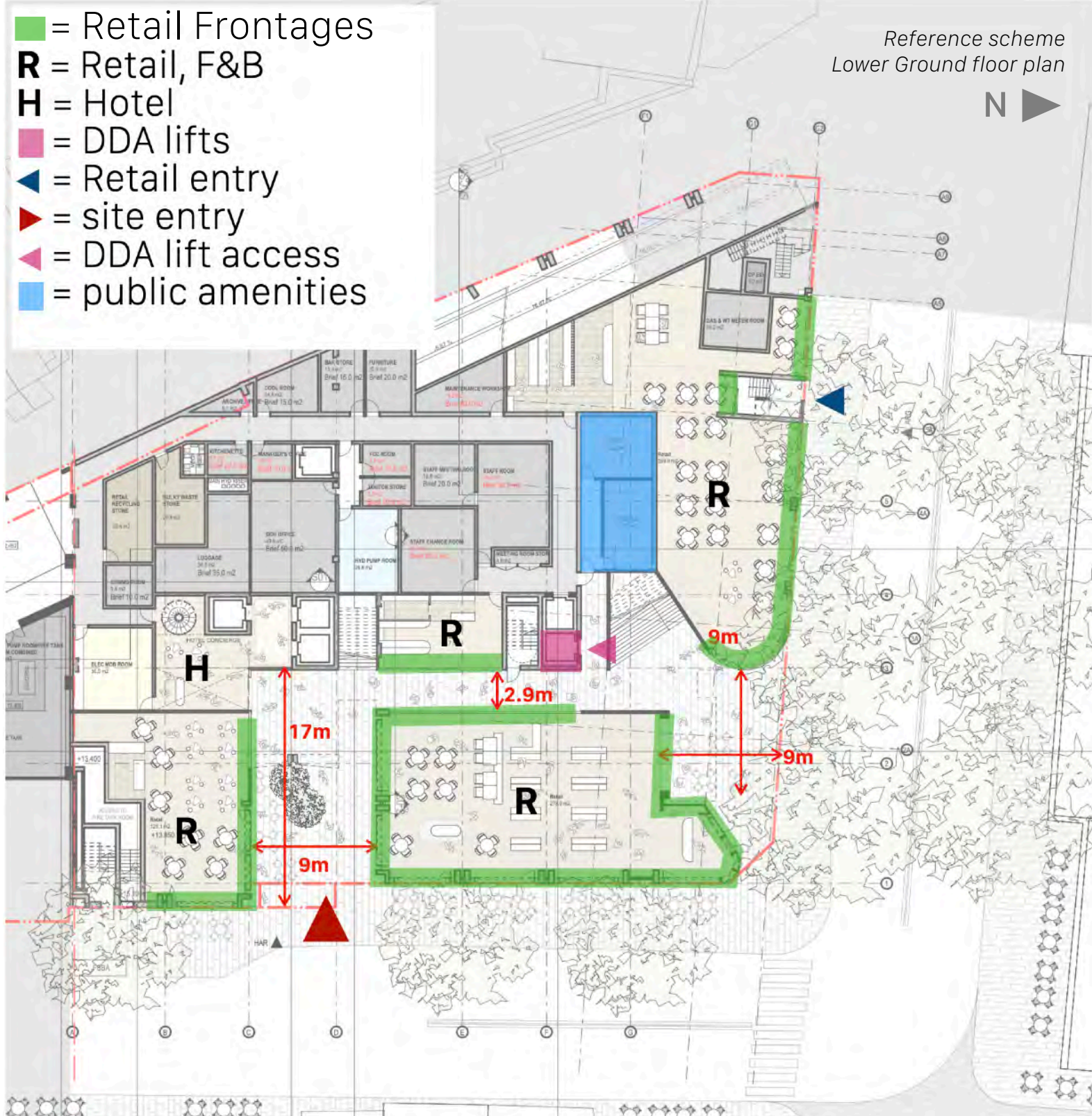
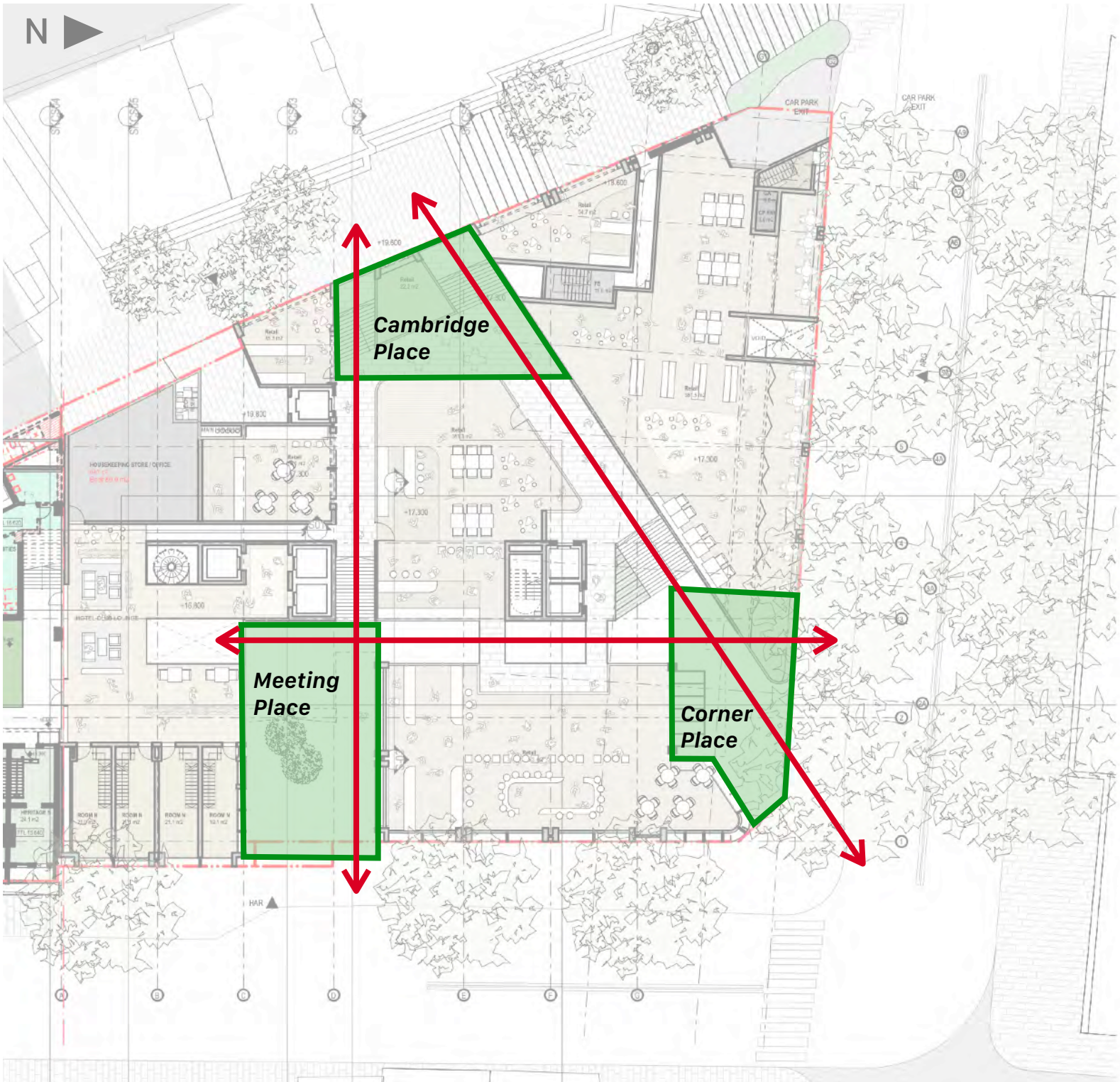


SCRA Control Diagram, with nominated thru-links highlighted



Proposed Control Diagram, with revised thru-links highlighted

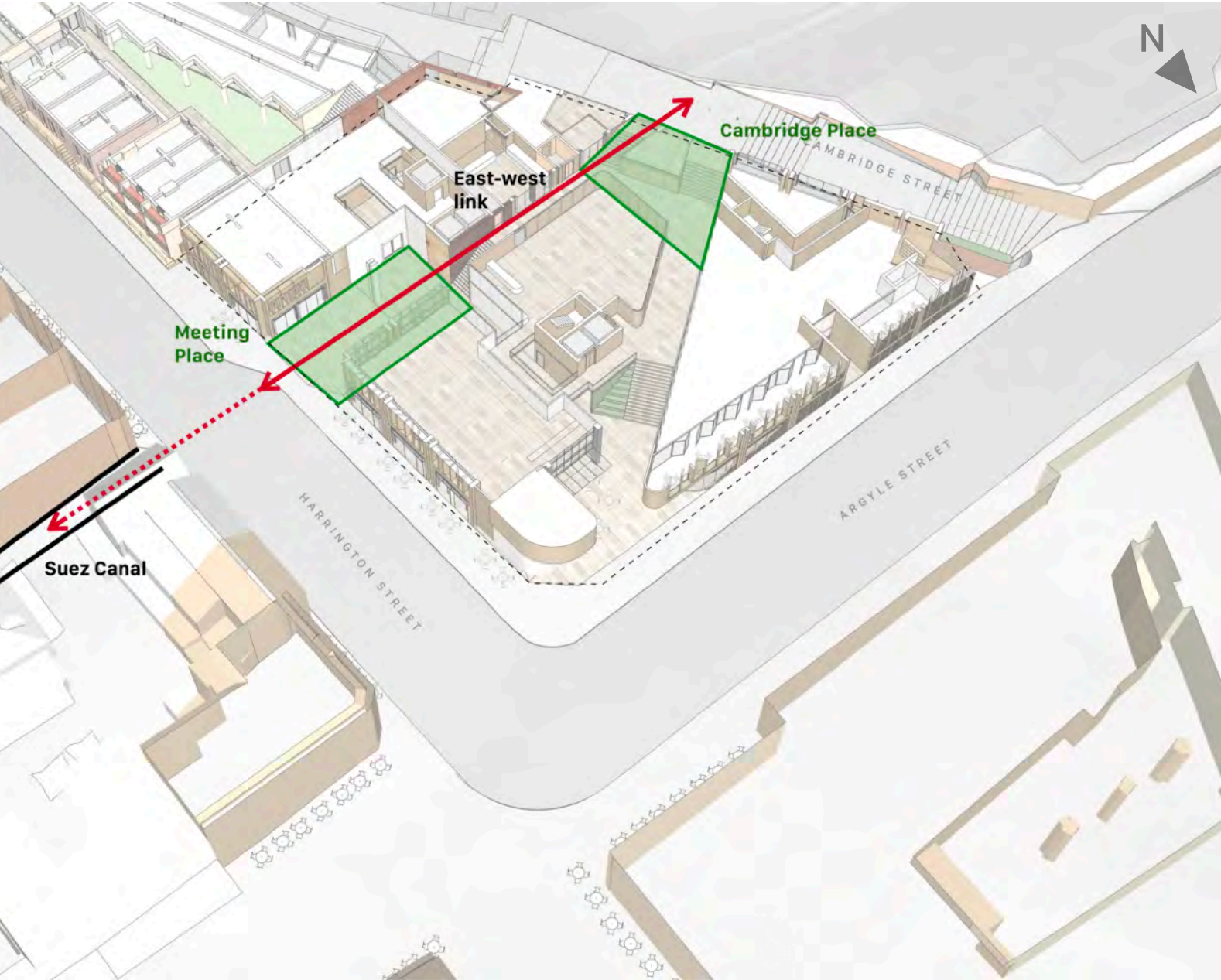
Floor plan diagram identifying the three through links and public spaces



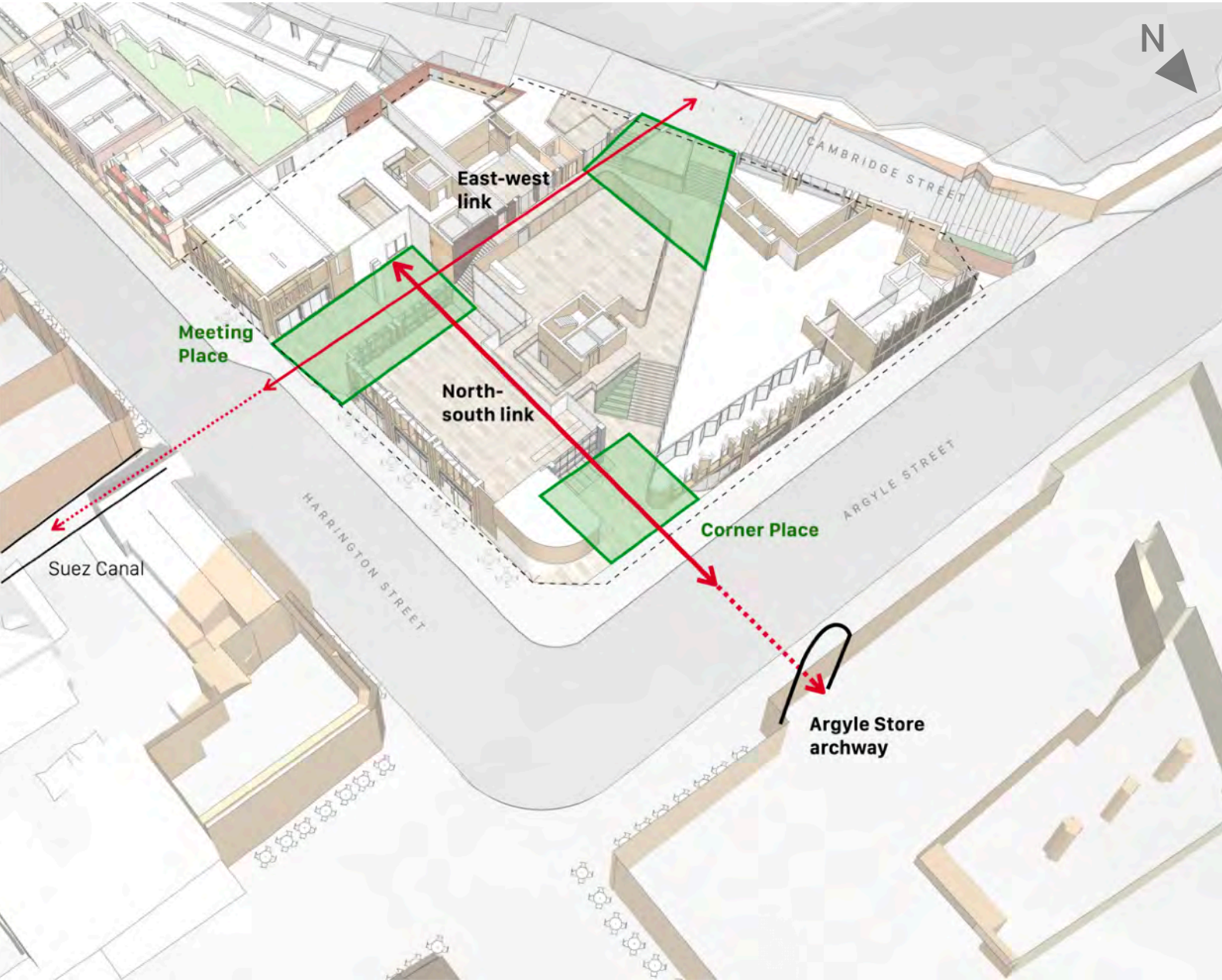
35-55 Harrington Street

Reference Scheme Through-site Links and Wayfinding

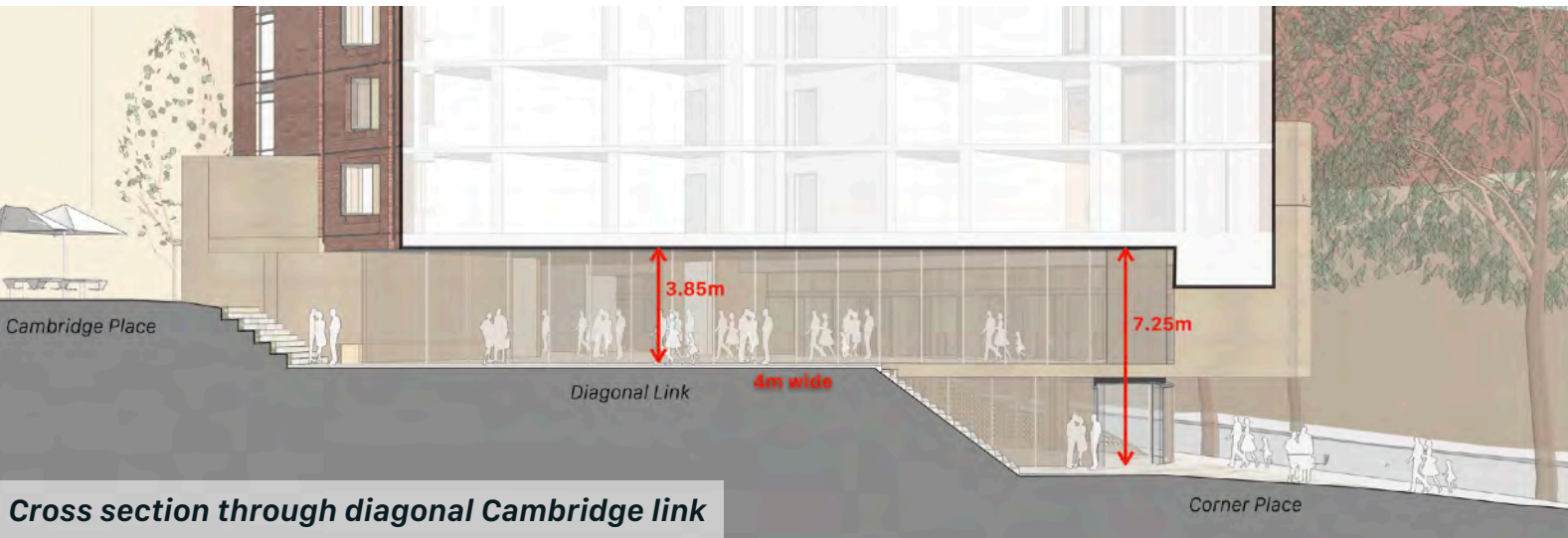
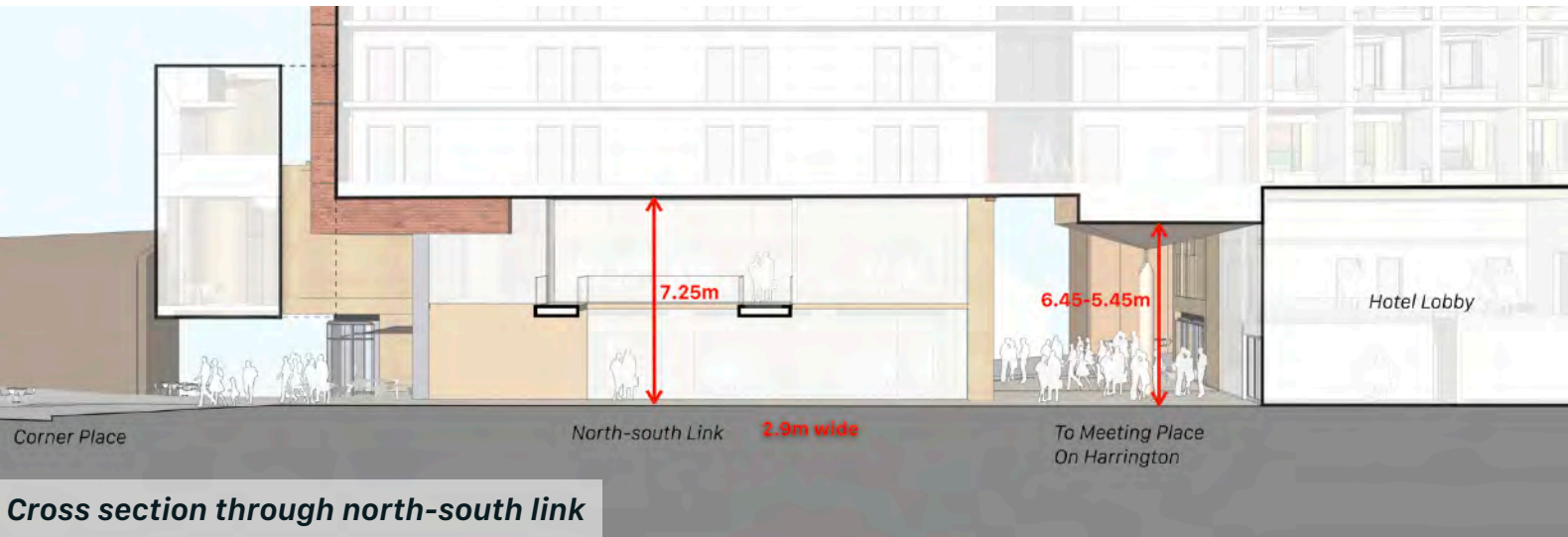
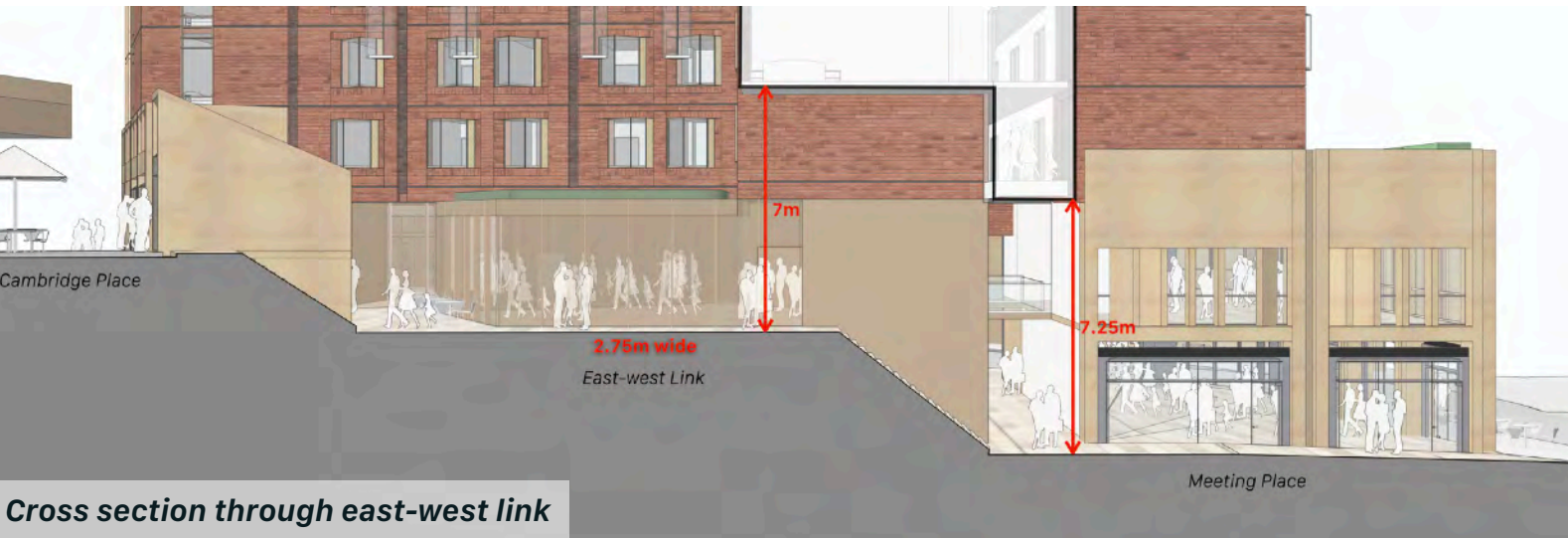
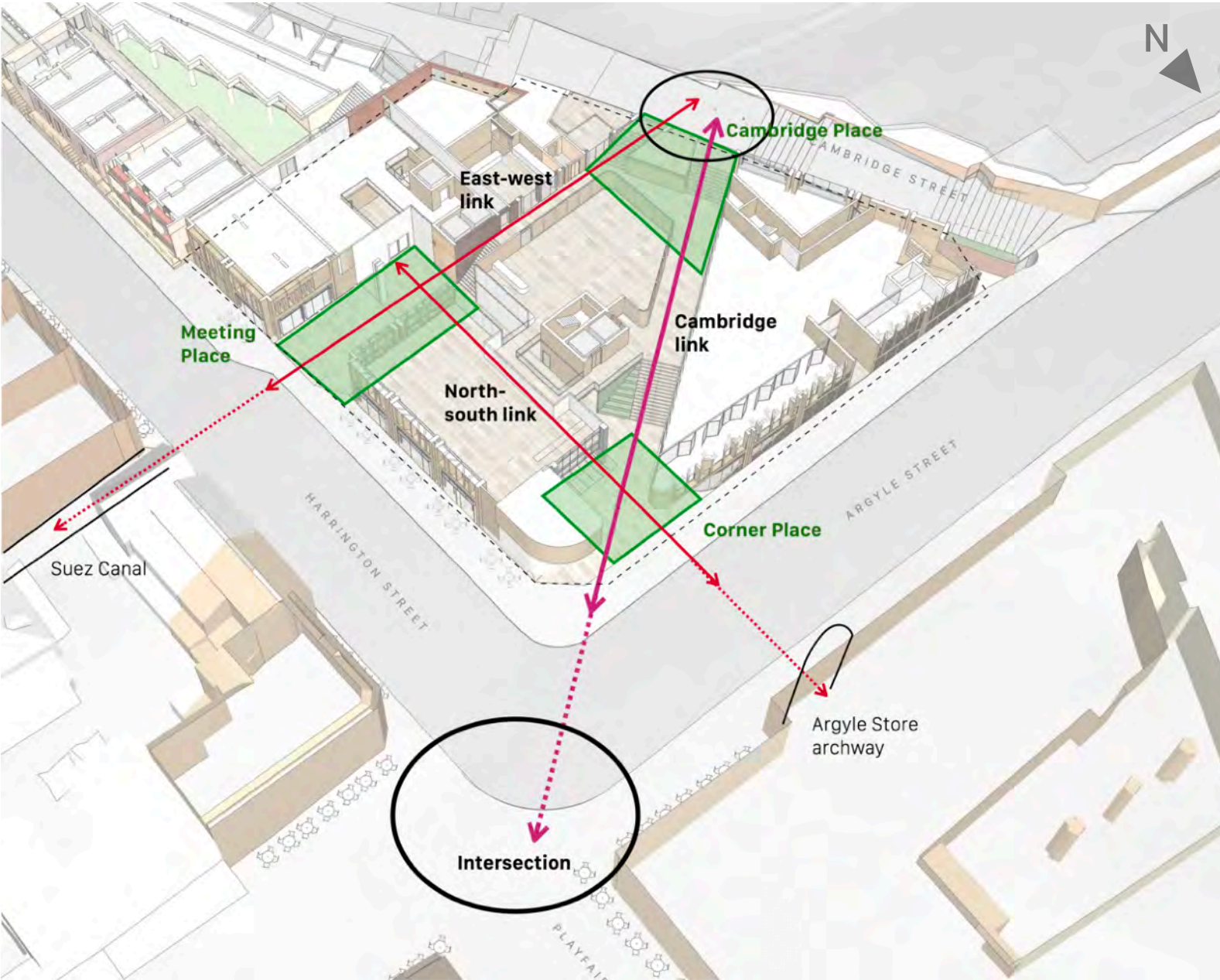
East-West link The alignment of this link is consistent with the SCRA control and aligns with the Suez Canal and nurses walk link between Harrington and George. The heights and open-to-sky amenity established in SDRP2 have been preserved, with the addition of new retail tenancies to the south of the link on upper ground floor providing greater activation and passive surveillance.



North-south link The alignment of this link is also consistent with the SCRA control and aligns with the Argyle Stores arch-way entry to the North, and the Quincy hotel lobby entry to the south. As per the SCRA, a continued southern extension of the thru-link into the existing Rendezvous hotel south is not possible due to the existing structure and significant level changes, and the site tapers to a point at the south anyway.



Diagonal Cambridge Link This new link is intended to reenergise Cambridge Street by revealing it to the pedestrian Argyle and Playfair footfall. As exciting as the east-west link will be, the exposure from the intersection is limited. Pursuing a vibrant ground plane, it is critical the site is permeable, welcoming and active.



35-55 Harrington Street

Reference Scheme Public Space Concept

There are three public spaces featured in the Reference Scheme, implied by the Proposed Control envelope;

Meeting Place; off Harrington Street and at the junction of the east-west and north-south through site links.

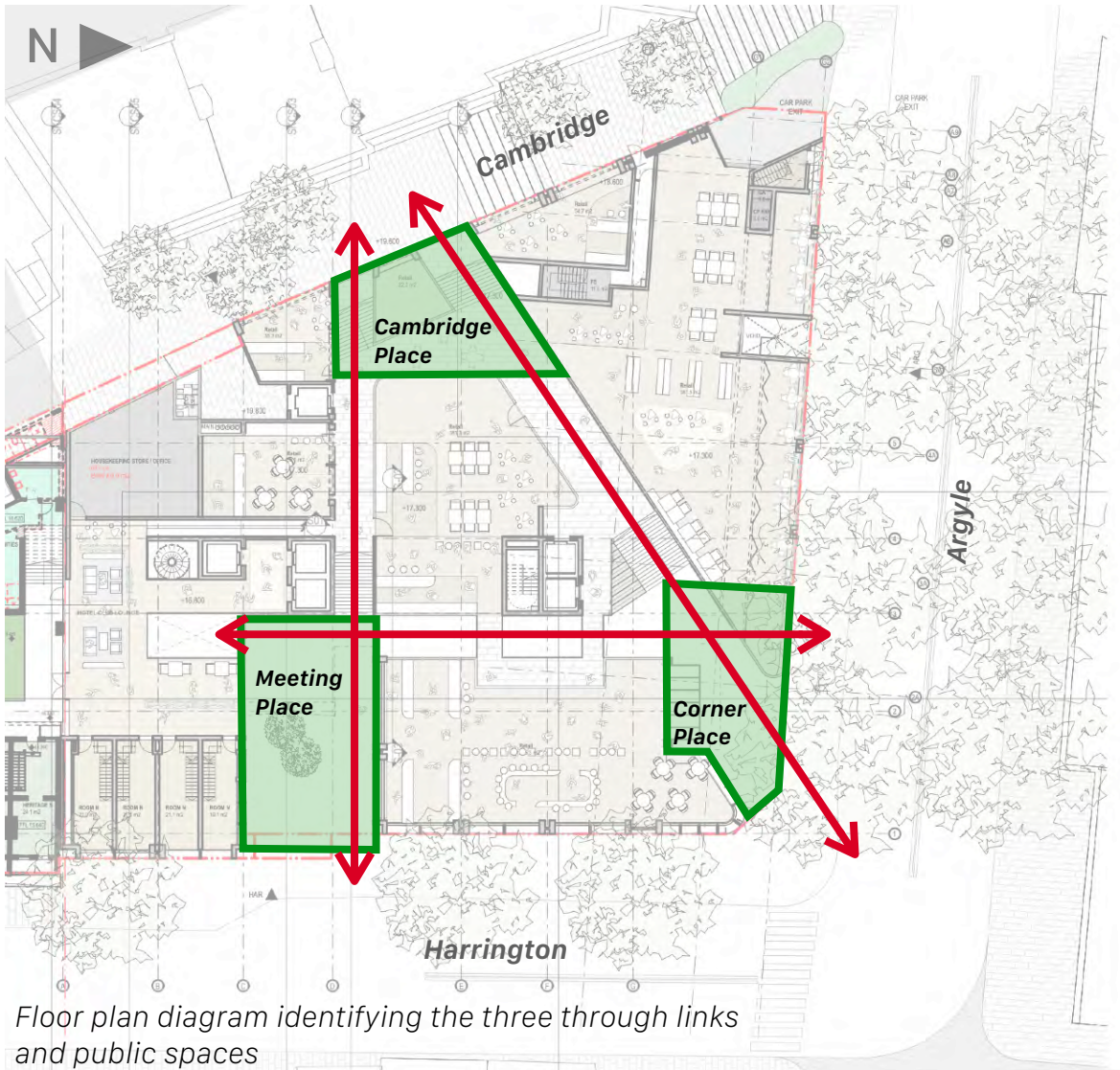
Cambridge Place; off the pedestrian Cambridge Street and at the convergence of the east-west and diagonal links.

Corner Place; at the Harrington and Argyle street intersection and the junction of the north-south and diagonal links.

Together, they provide a variety of spaces on site, each with their own inherent amenity and character.

Arcadia have been appointed as the Landscape Design lead and have outlined 6 design principles that will underpin ongoing design development.

Initial concepts are also illustrated for each space below.



Landscape Design Principles

Connection to Country

Celebrating the traditional use of the site through a narrative of seasonal rhythm. Acknowledging the site's ceremonial function and people of various countries gather seasonally through the song lines

Green Global Connection

Minimising the environmental impact of the design outcome by using sustainable design methodology and materials

Activation of Communal Space

Contribute to the health and identity of the local community by offering accessible communal spaces and point of congregation

Native Vegetation

Showcase of native and indigenous vegetation to promote local character and connection to the local ecology

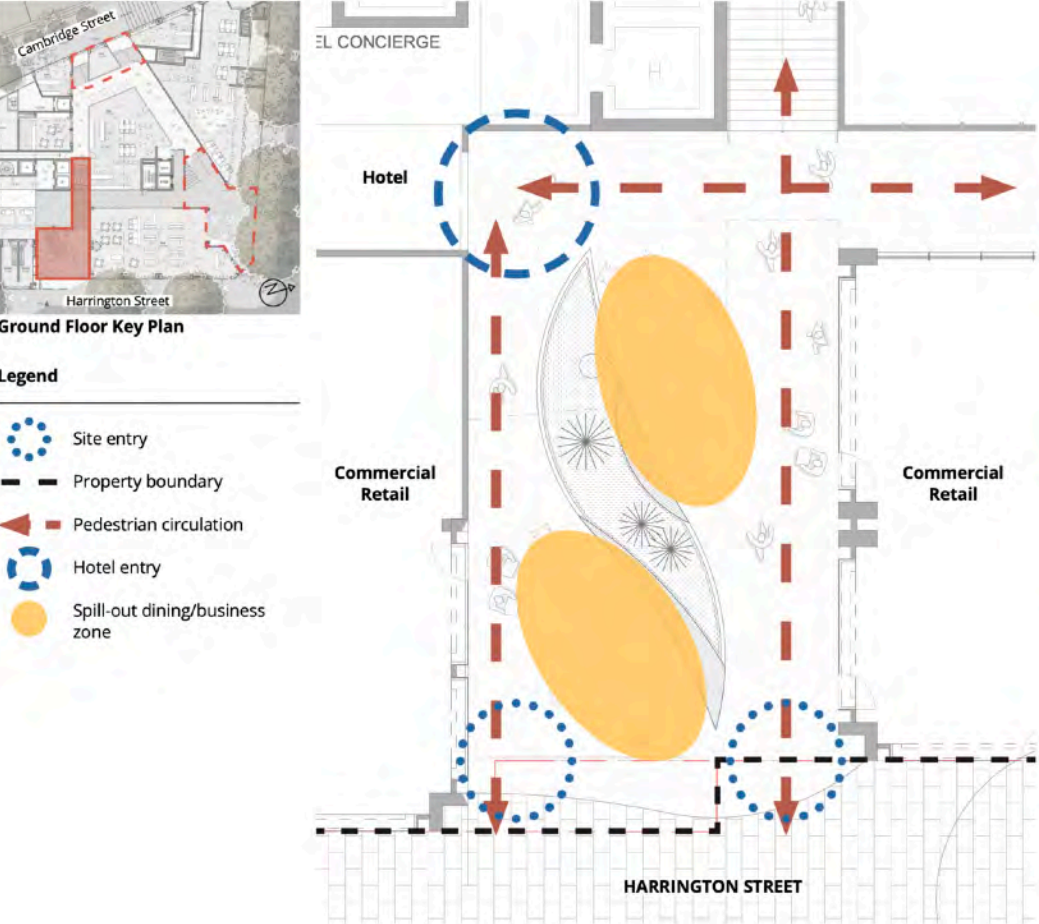
Natural Pattern

Soften the hardscape of the architecture by using natural patterns and design language to promote connection with Country

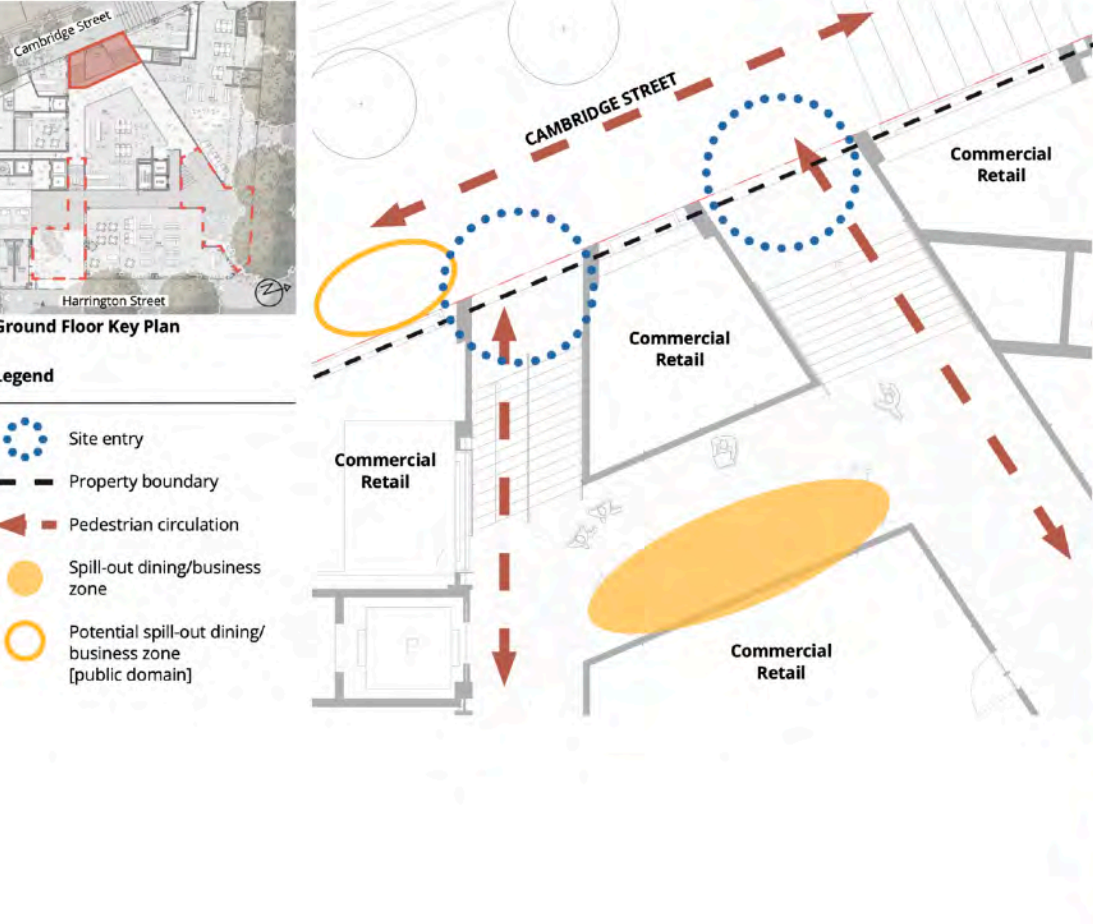
Urban Vernacular

Creating practical, accessible urban spaces to promote usage by the local community, and offer improvement to social and mental health

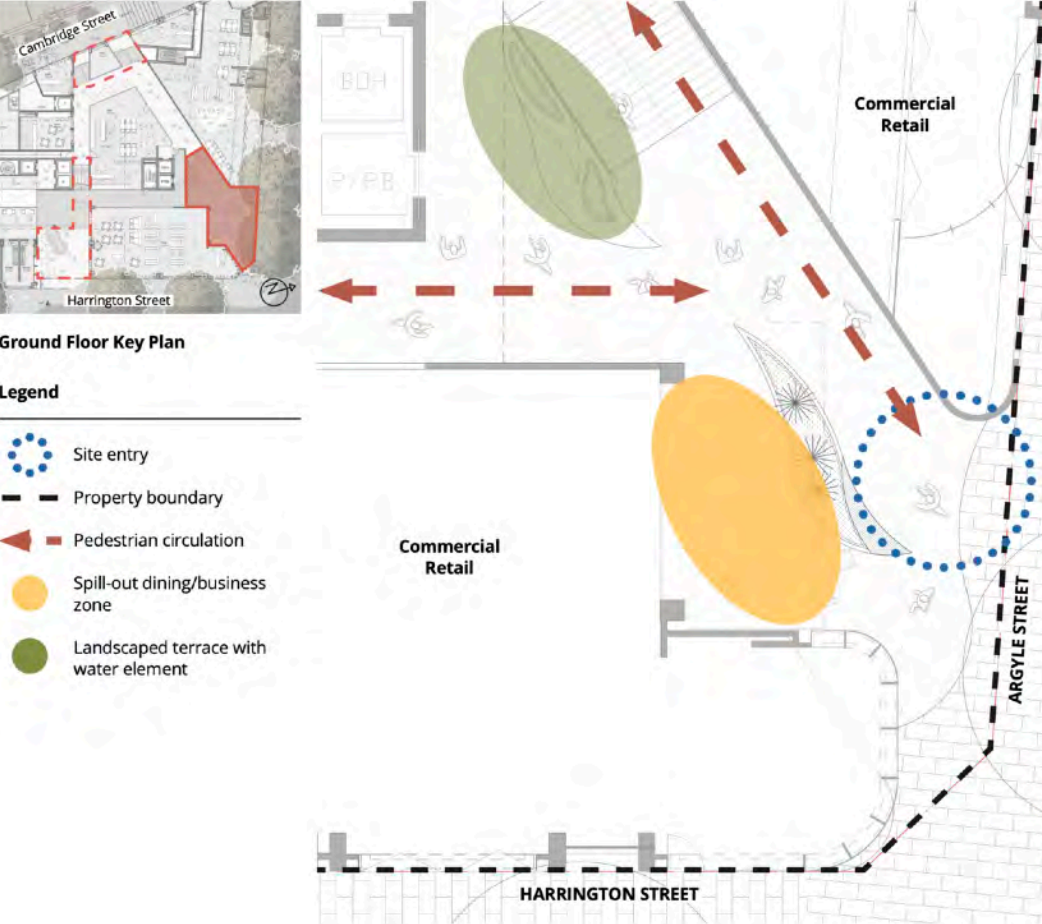
Meeting Place (Harrington Street)



Cambridge Place (Cambridge Street)



Corner Place (Harrington & Argyle intersection)



35-55 Harrington Street

Public Space Sun Access

The three public spaces are distributed to all street frontages to create a variety of experiences, including sun access (and shade) throughout the day and year.

The courtyard to Cambridge street in particular improves sun and daylight access to the streetscape.

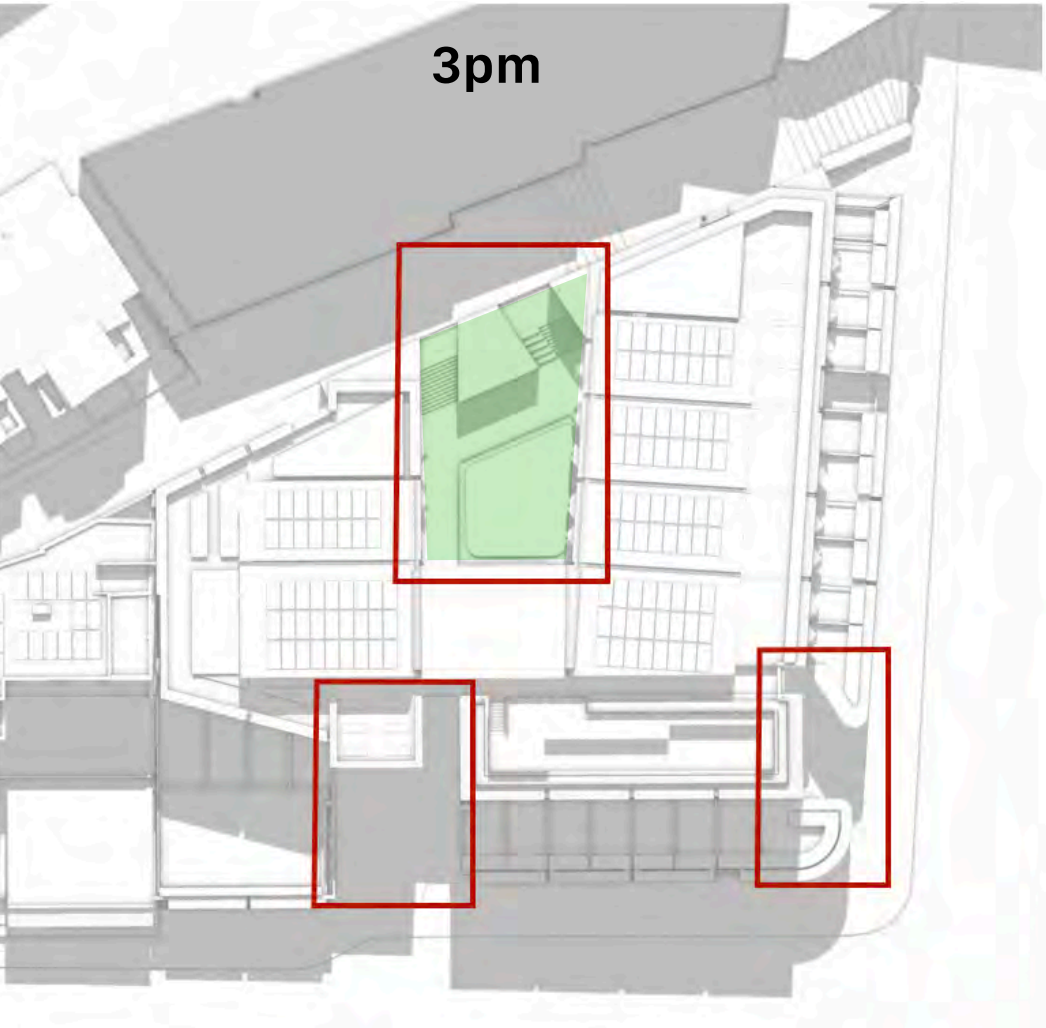
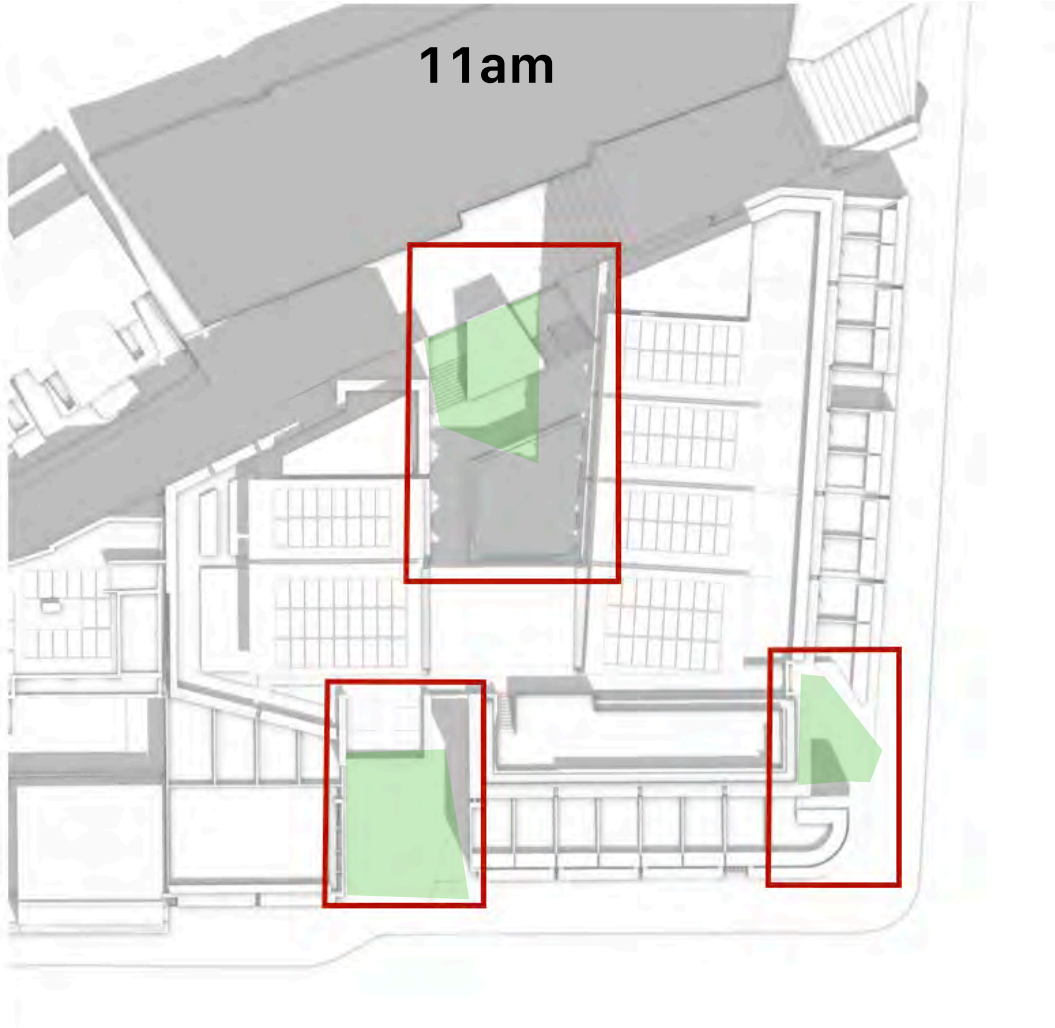
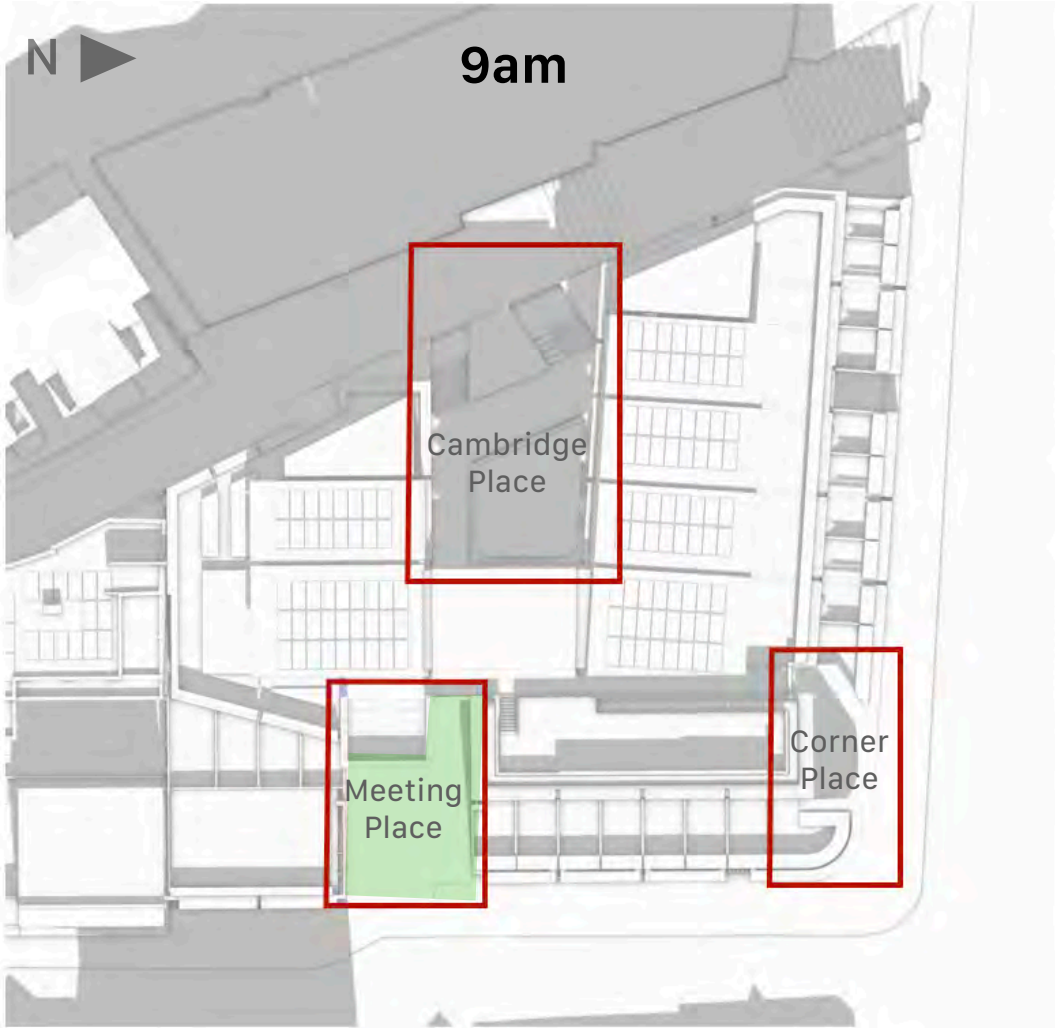
The green shading highlights the public space sun access.

Summer Solstice

Meeting Place
Morning through lunchtime sun
7:30am-1:30pm

Corner Place
Cantilevered building edges shade recessed areas

Cambridge Place
Sun from 10 to 4:30pm

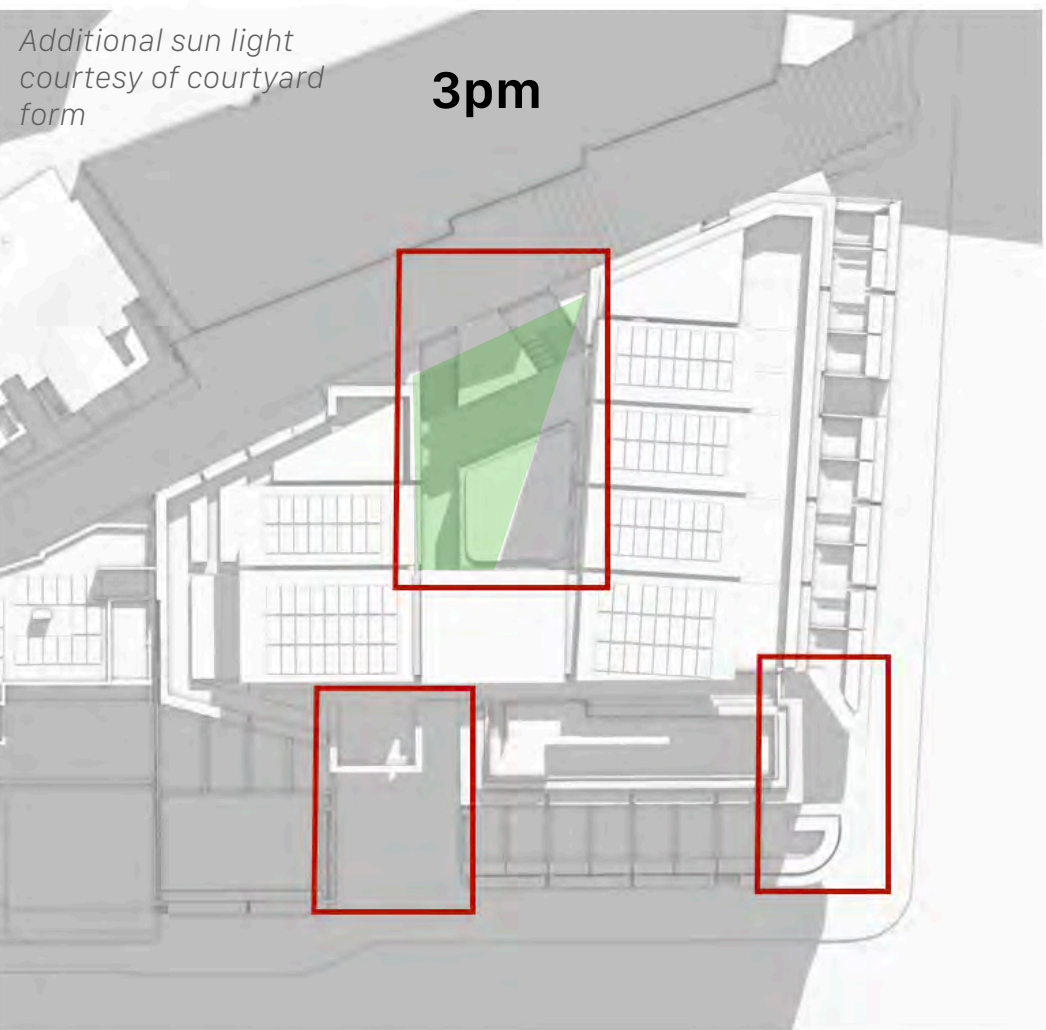
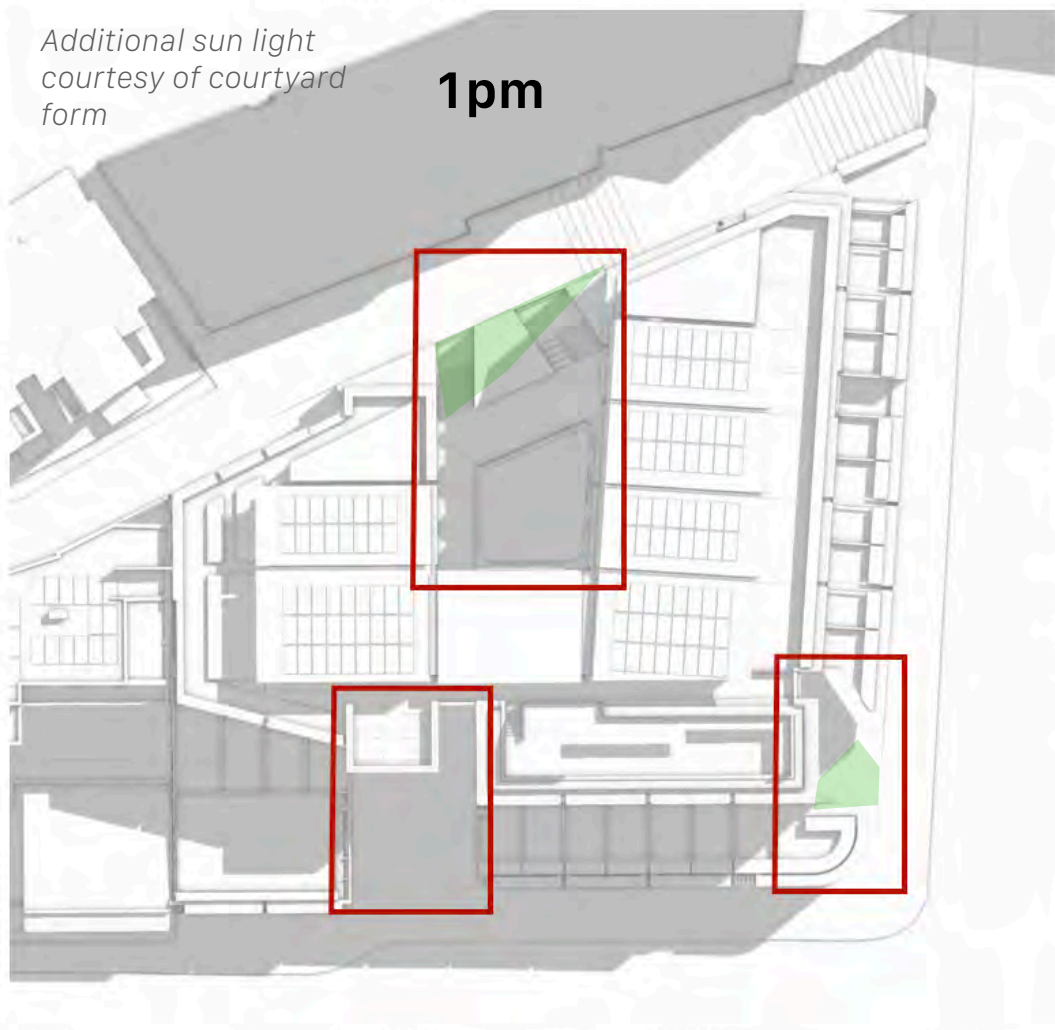
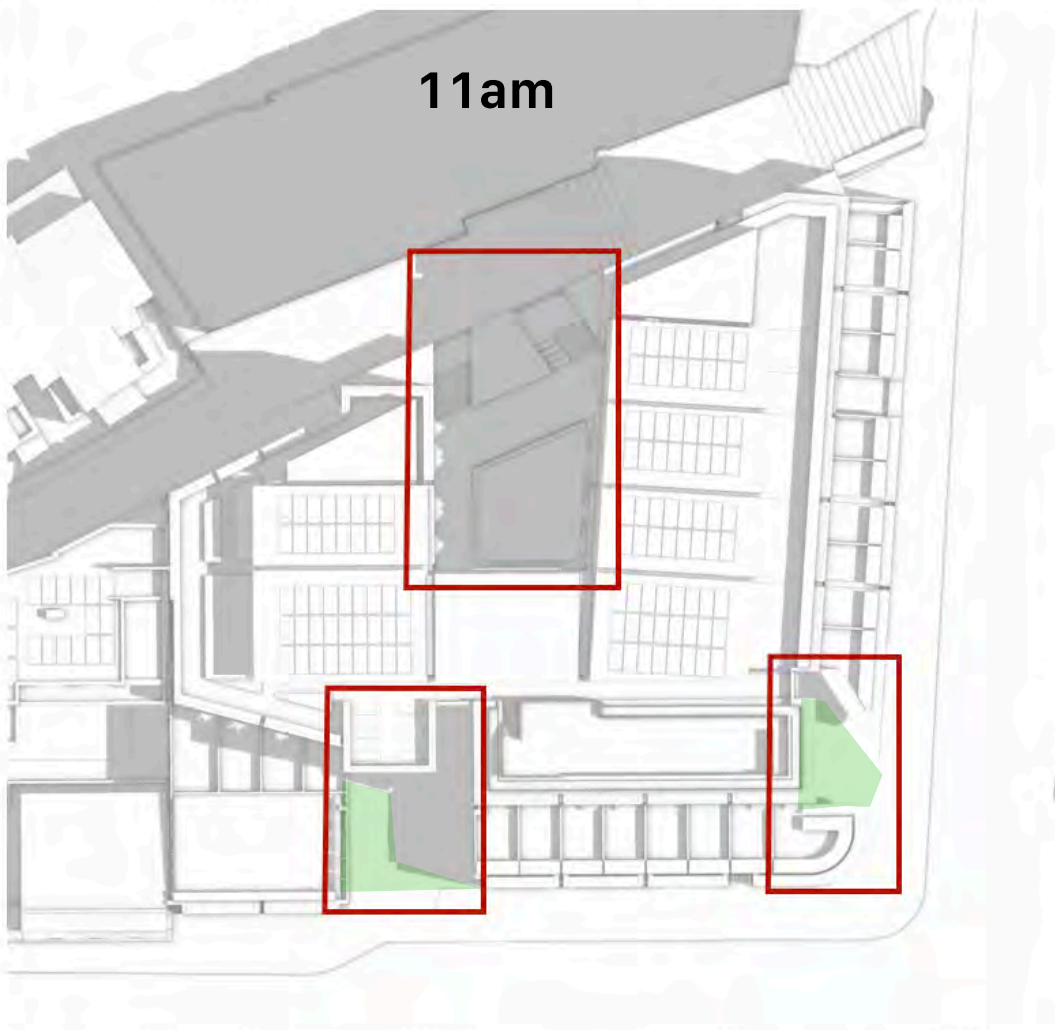
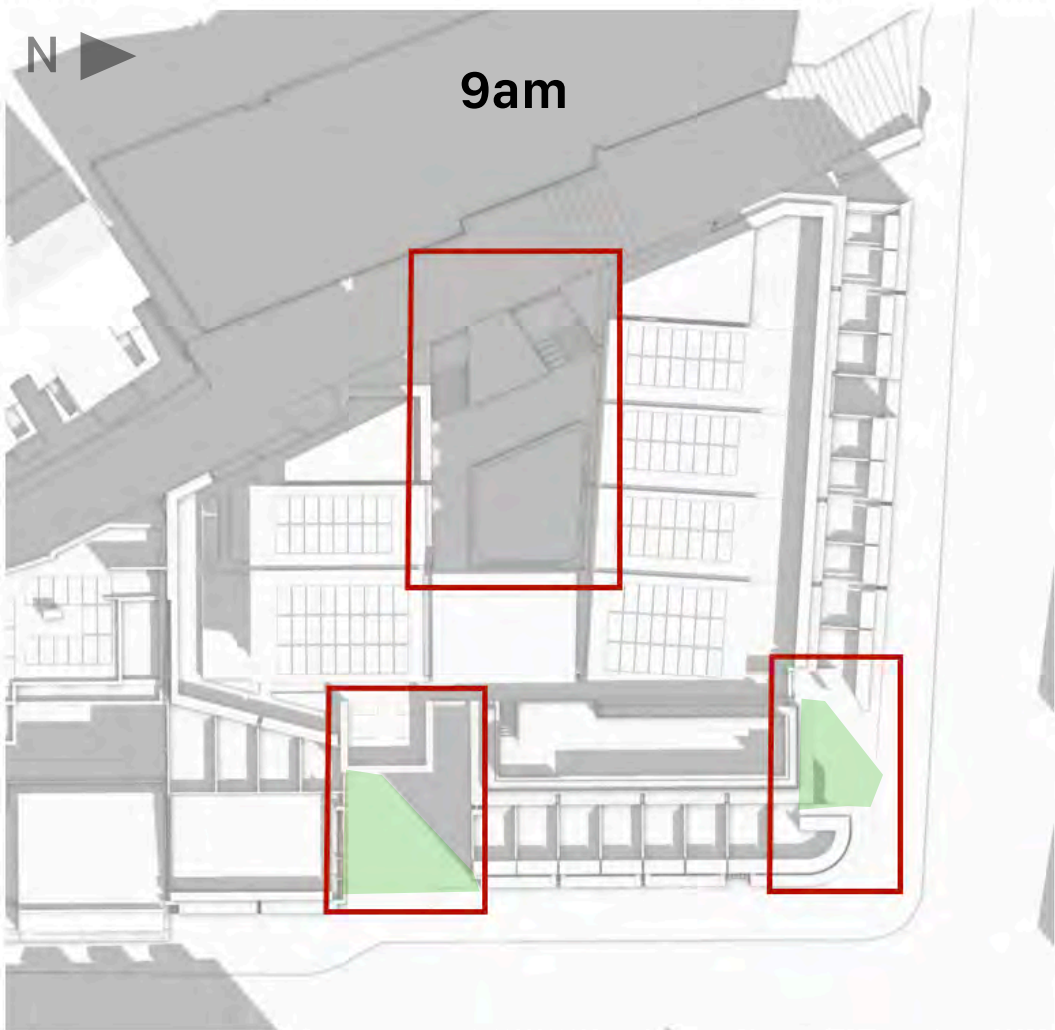


Equinox

Meeting Place
Good morning sun, 7:30-12:00pm

Corner Place
Sun access throughout the day

Cambridge Place
Later sun from 1 to 3:30pm

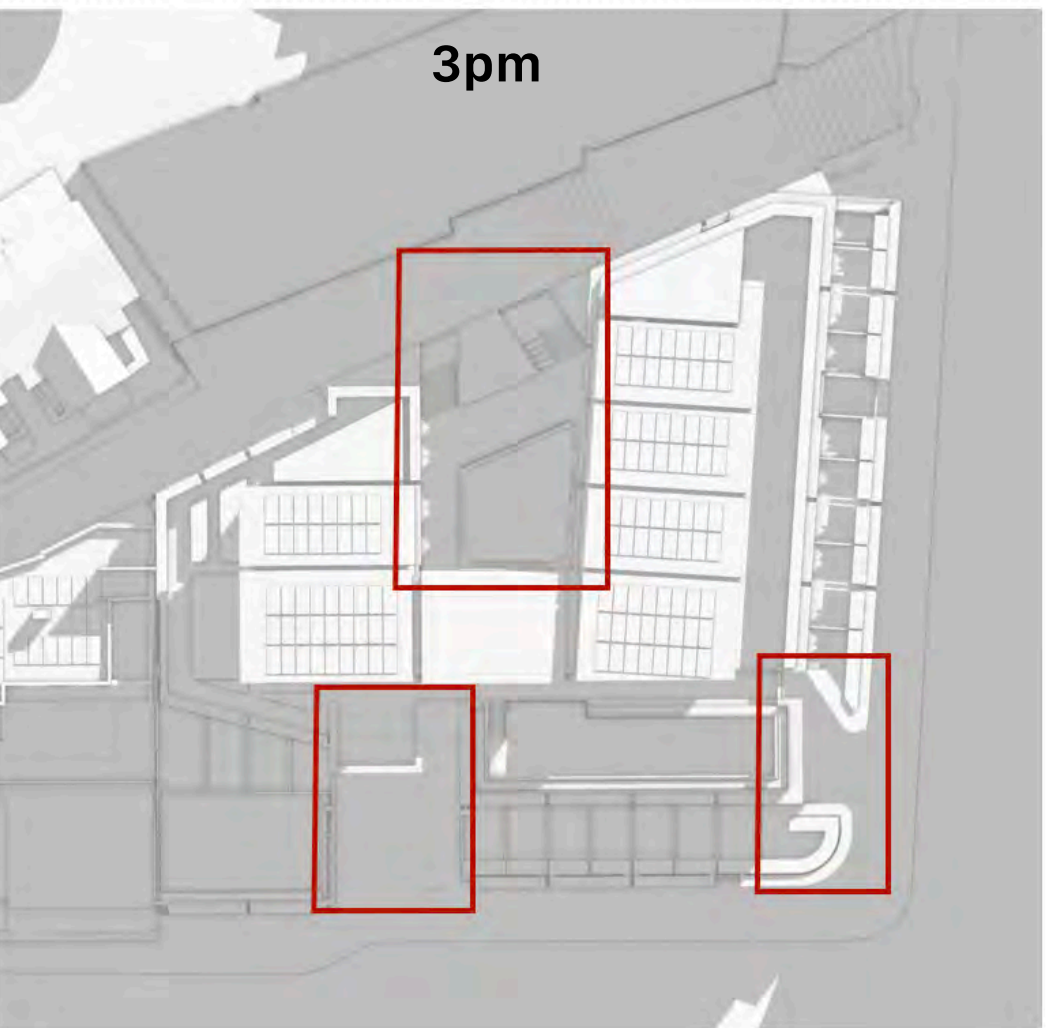
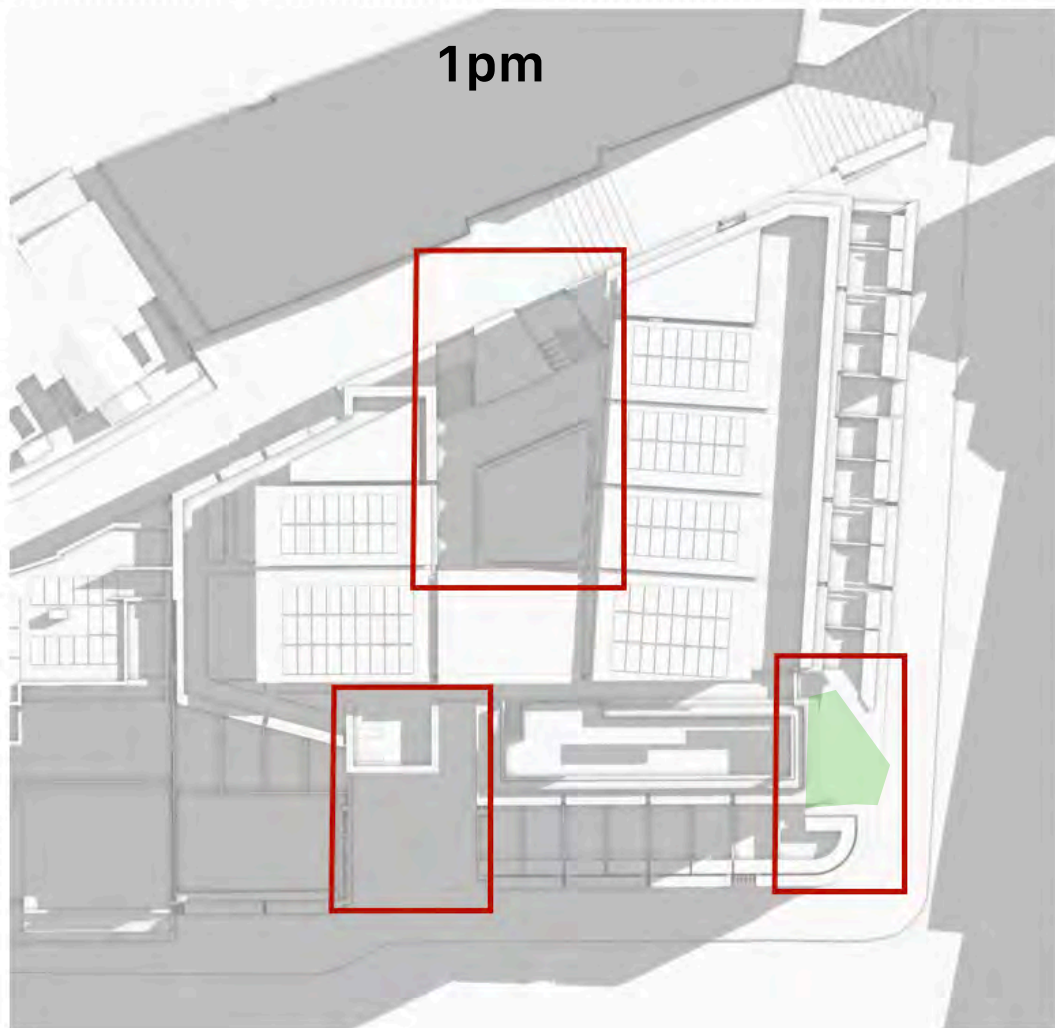
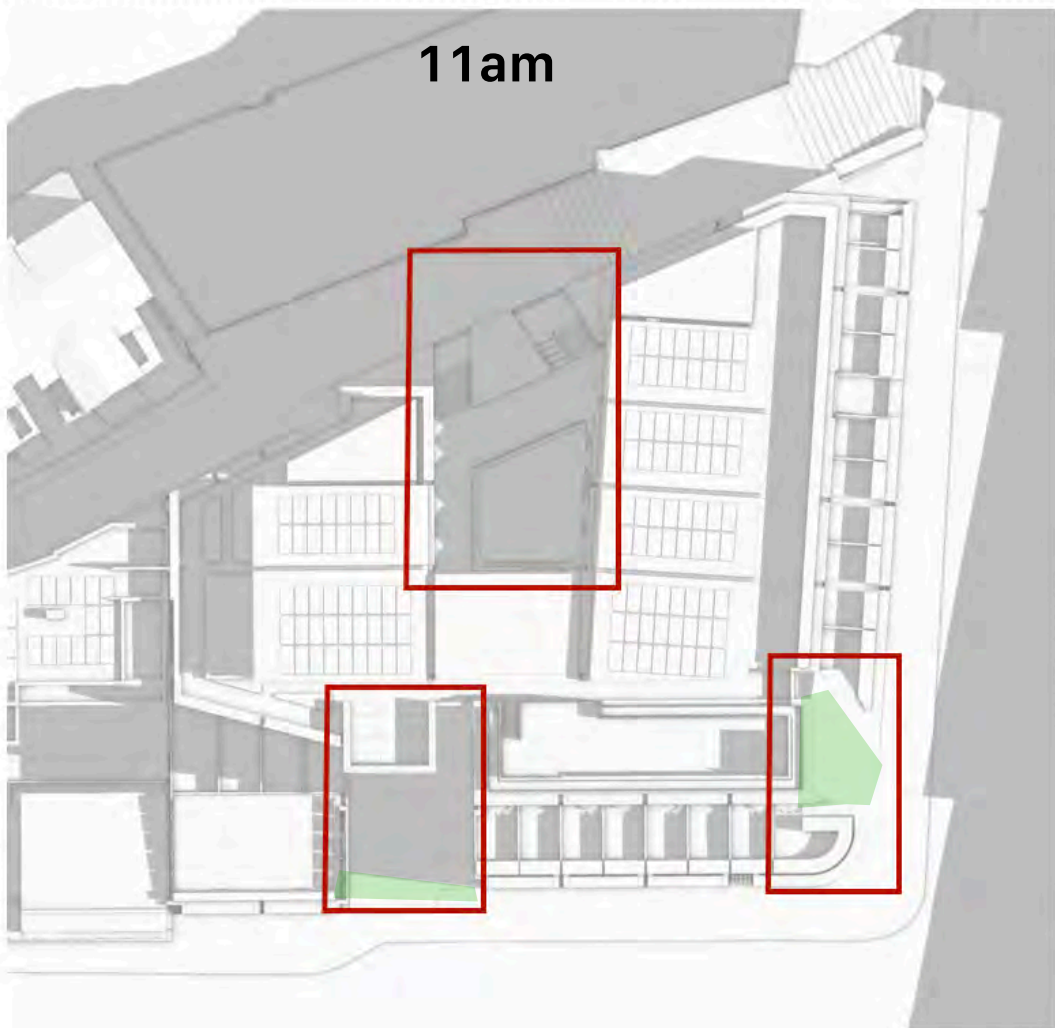
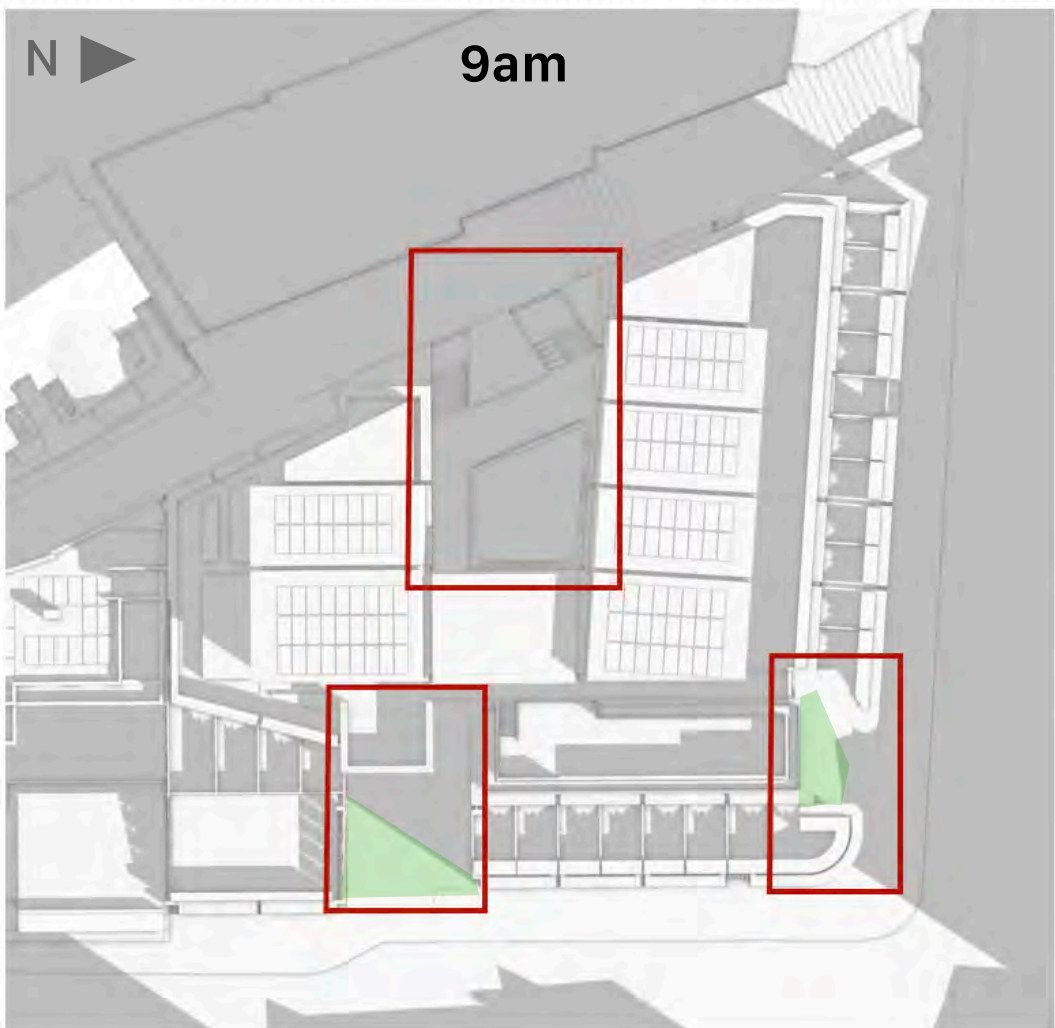


Winter Solstice

Meeting Place
Good morning sun, 8-11:30am

Corner Place
Sun access throughout the day

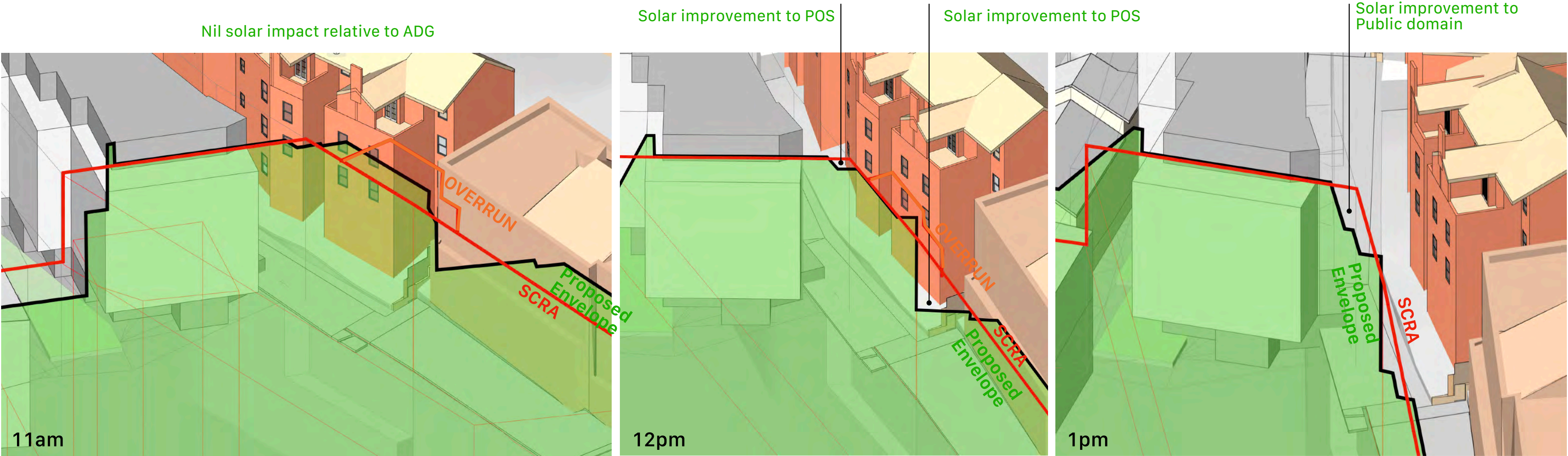
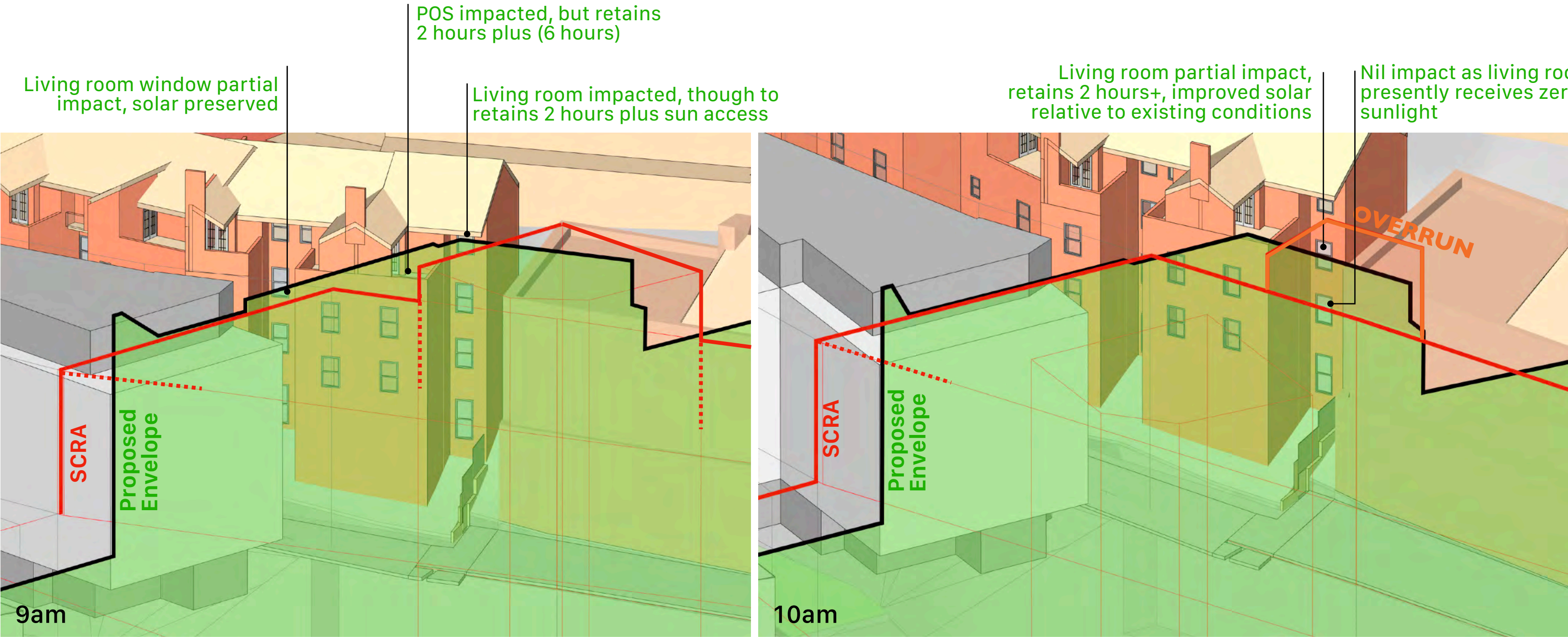
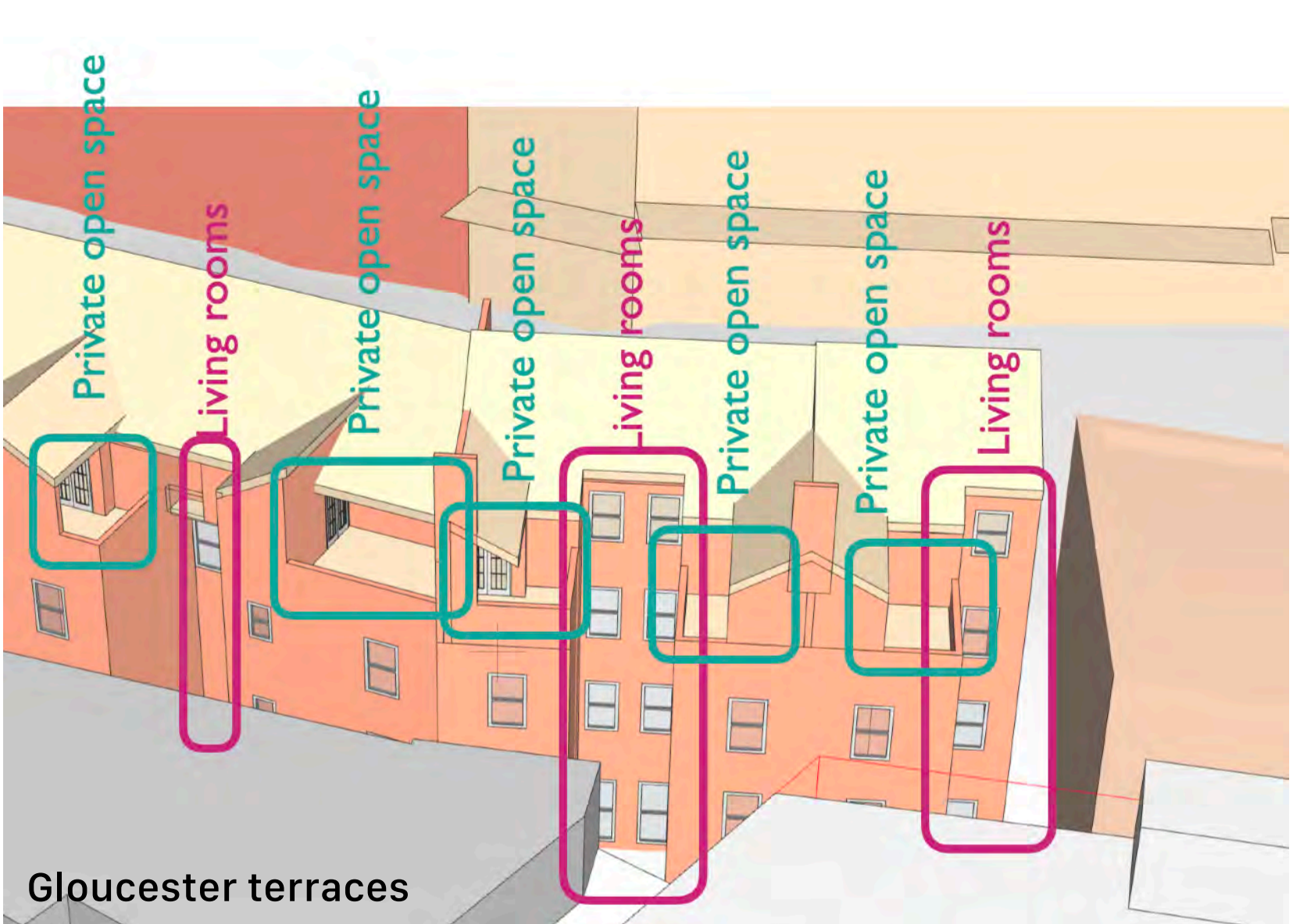
Cambridge Place
1pm sun to street face

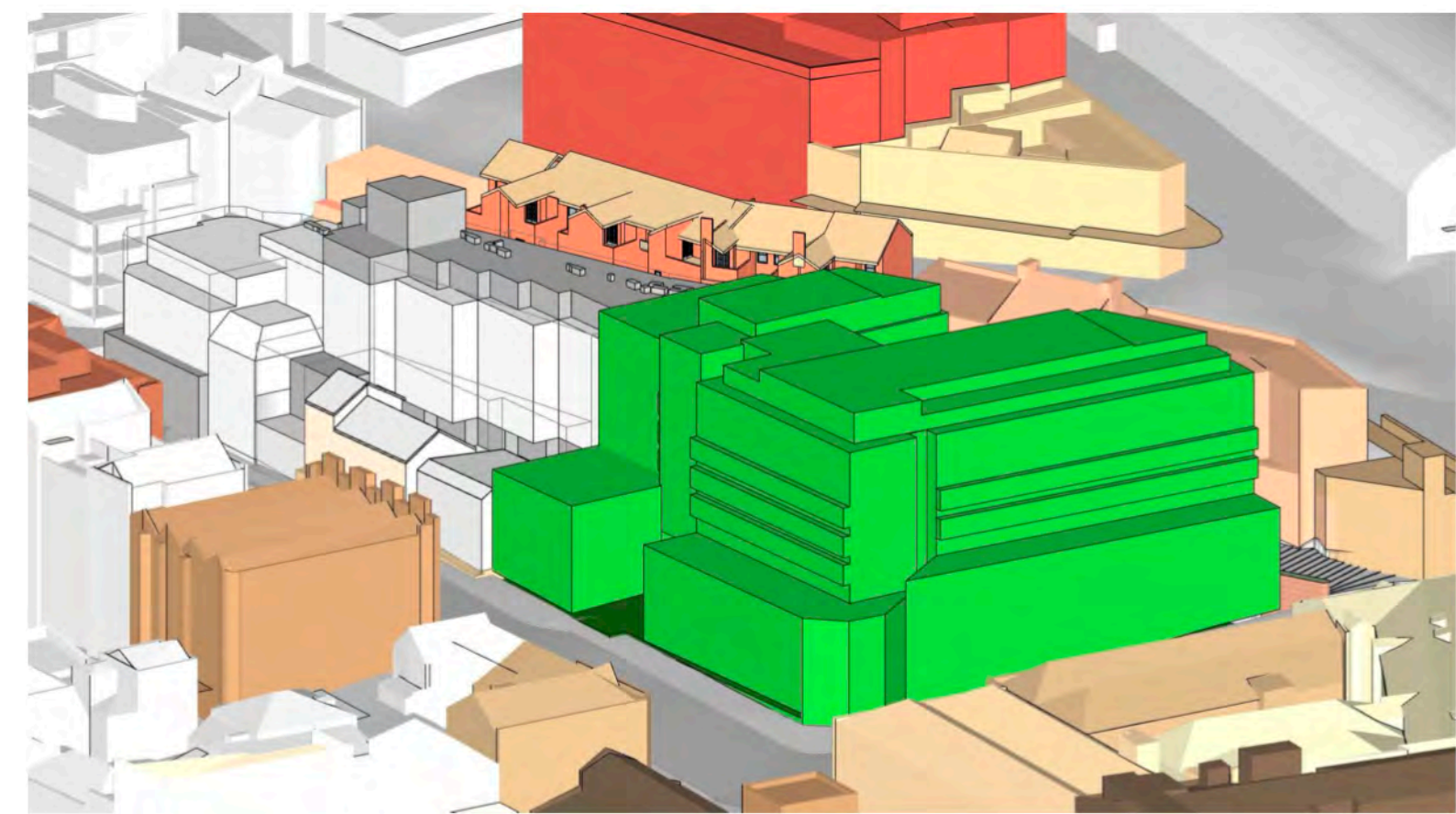


Detailed overshadowing assessment has been conducted to confirm there are nil negative impacts to surrounding residential properties from the proposed control envelope.

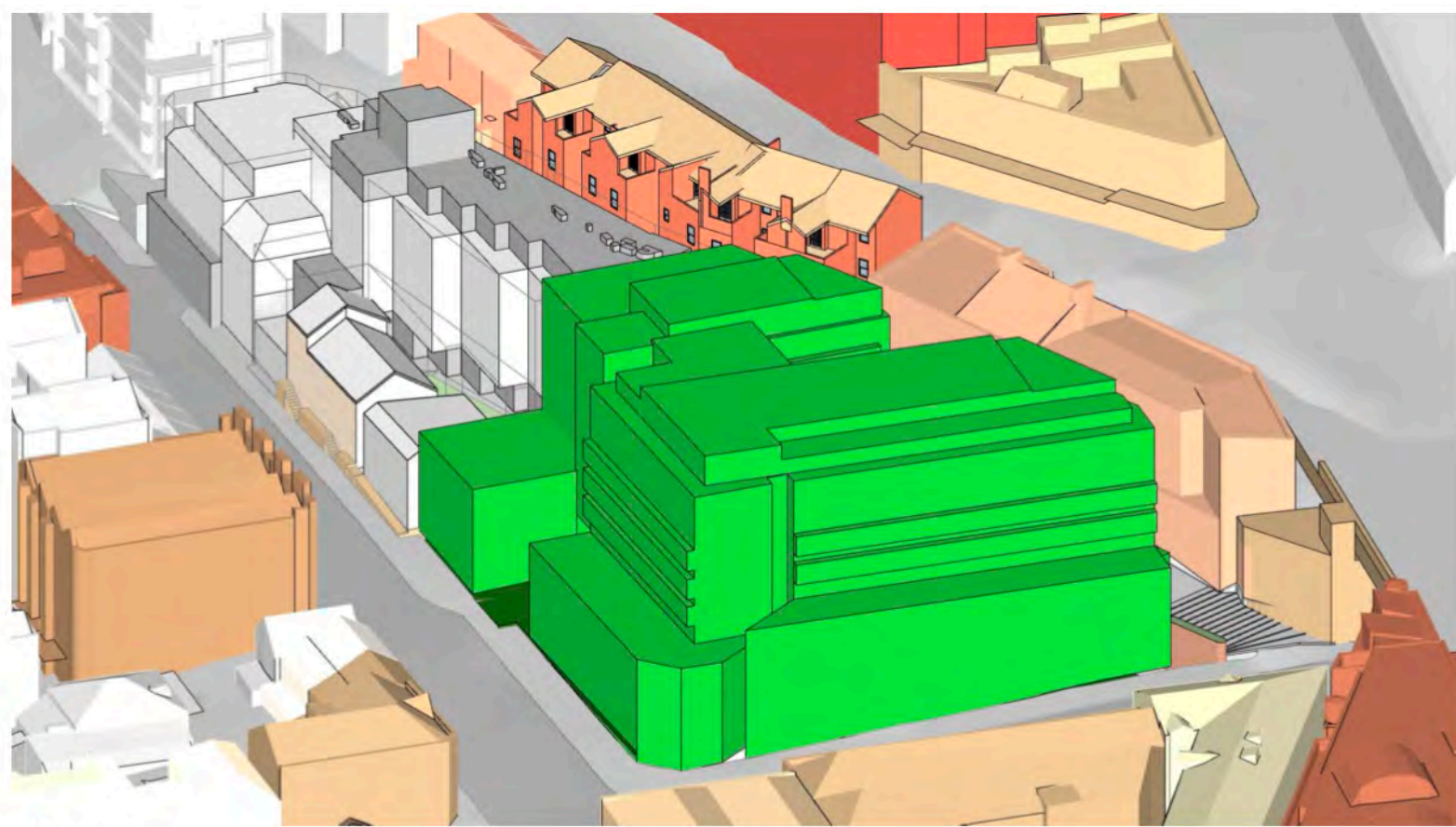
There is only one stretch of residential neighbours, namely the Gloucester Street terraces to the south west. We have reviewed solar impacts on June 21st from 9am to 3pm and have assessed those impacts relative to the ADG. The summary detailed in images adjacent, however, there are nil adverse ADG impacts, with a net increase in solar access amenity.

Legend:
Green with black outline is proposed envelope
Red outline is '86 SCRA envelope
Orange outline is the existing lift overrun
(Note: from 1pm onwards there is no shadow to these terraces)

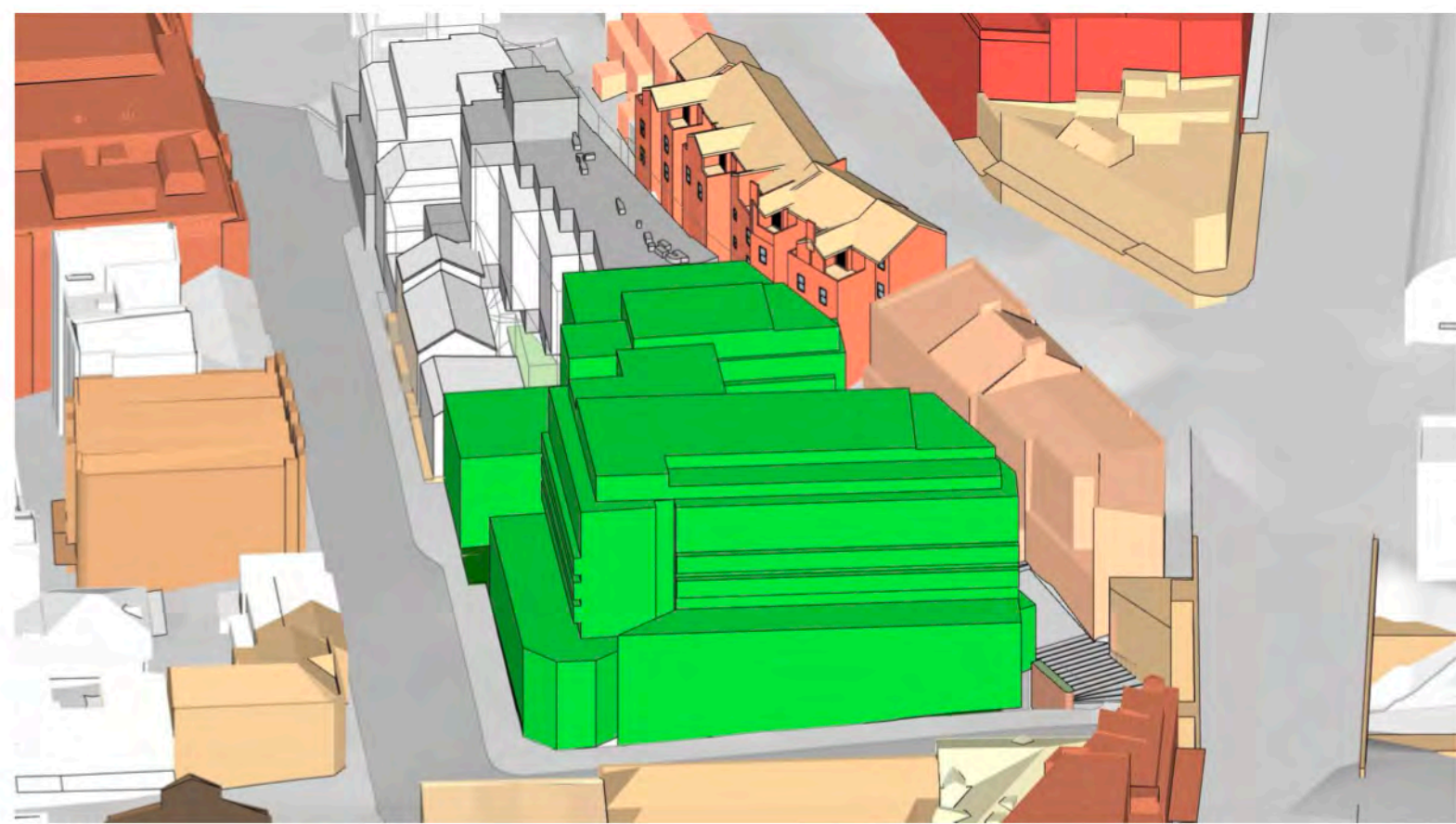




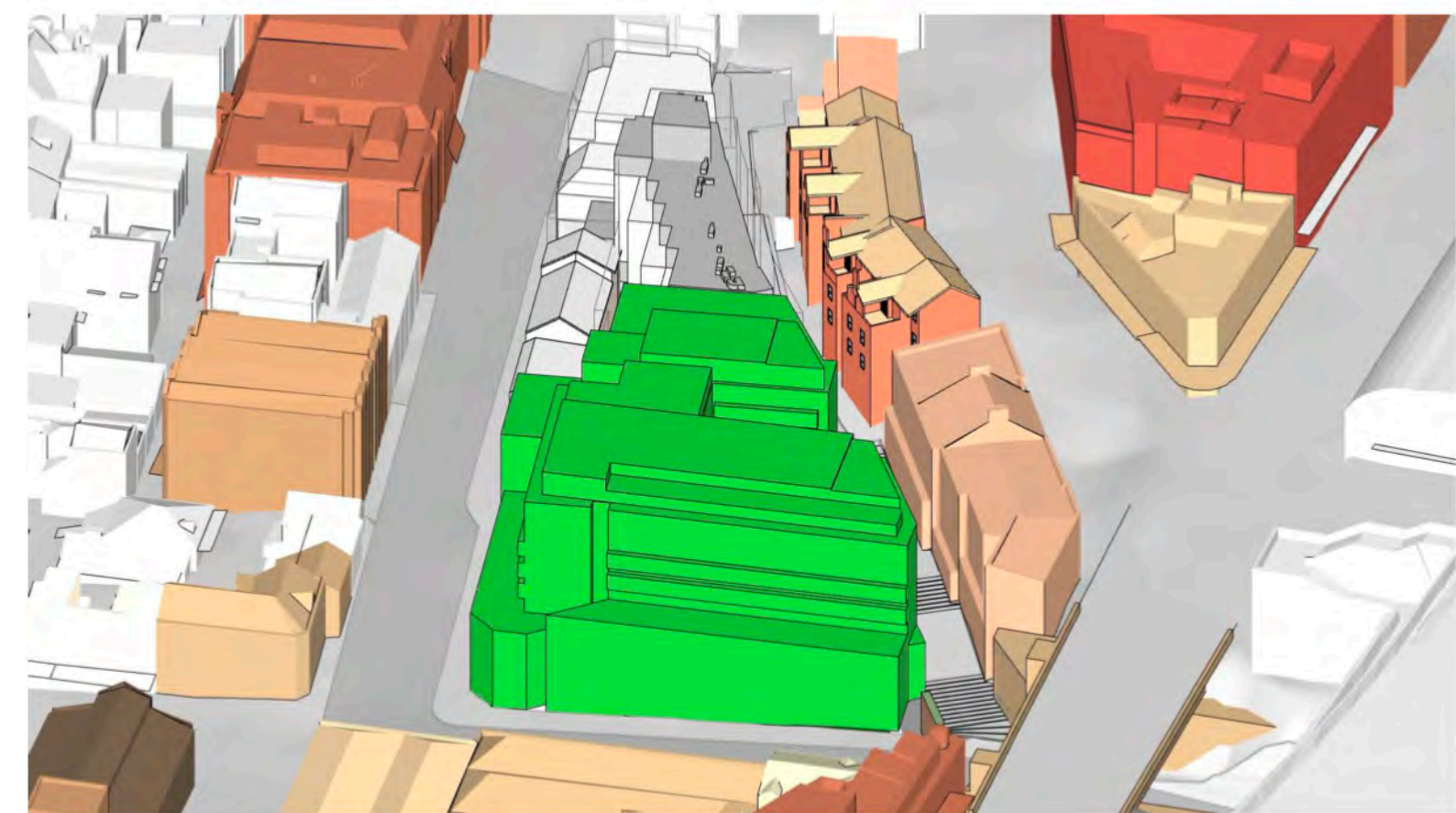
9am



10am



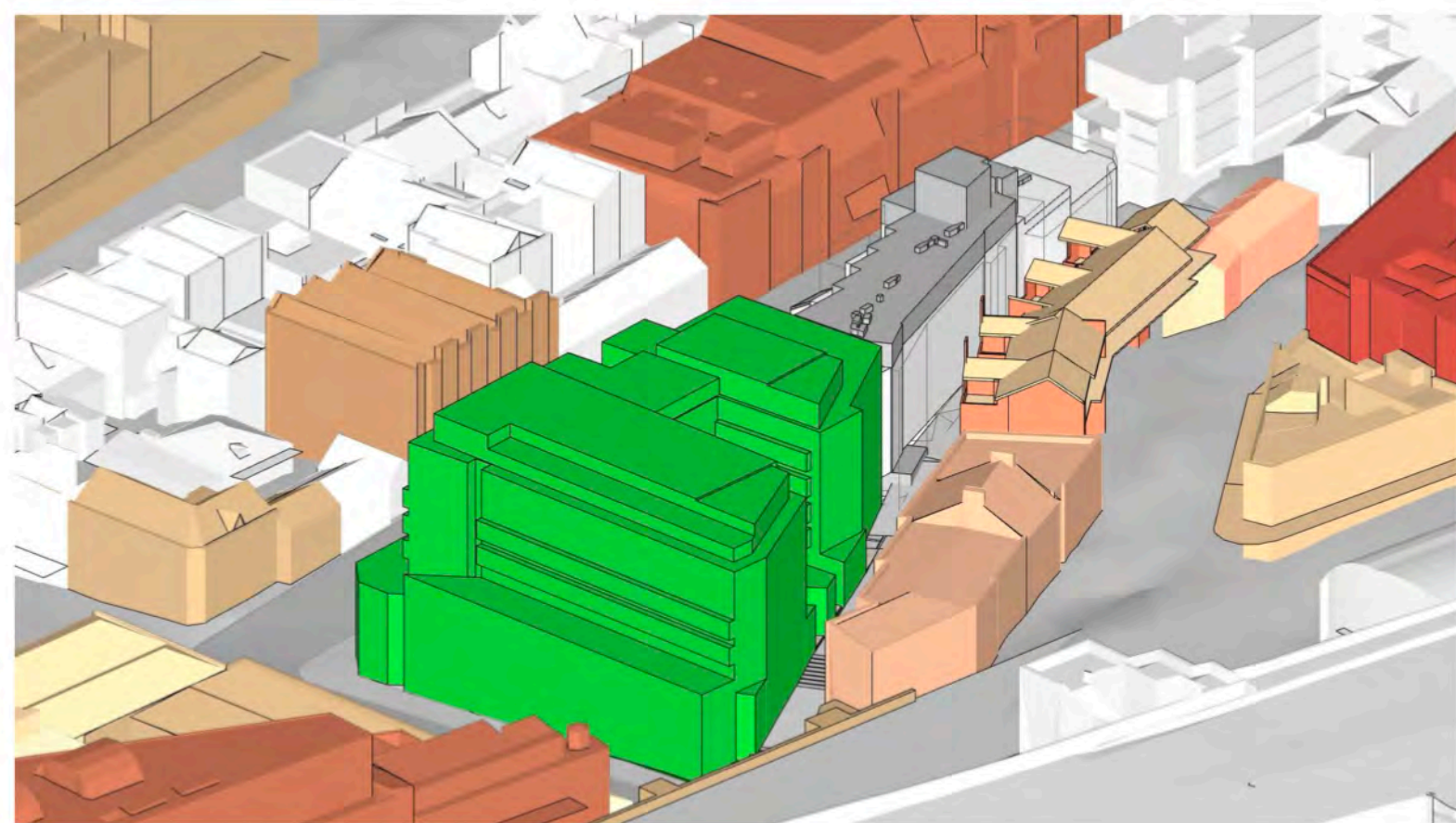
11am



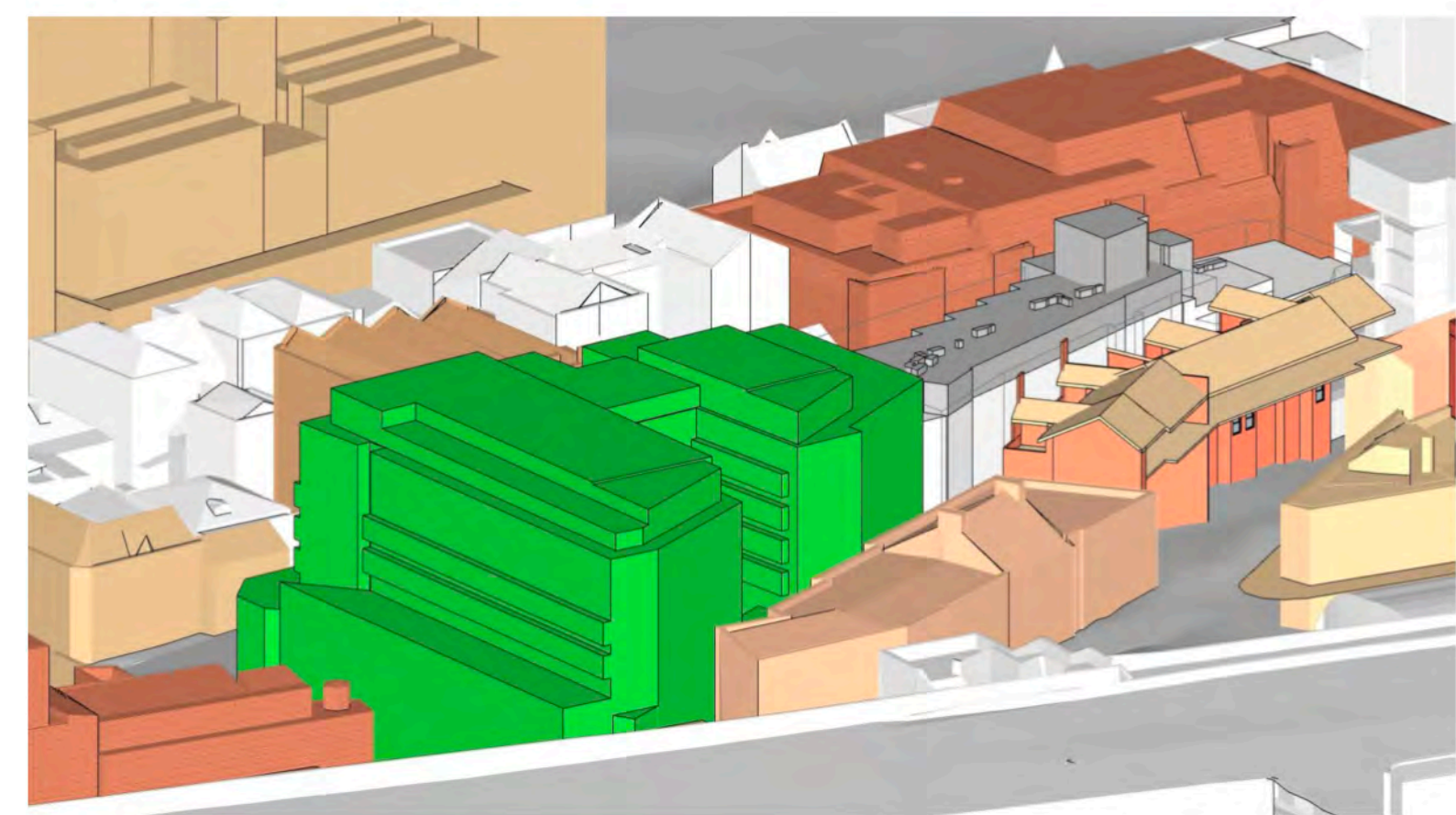
12pm



1pm



2pm

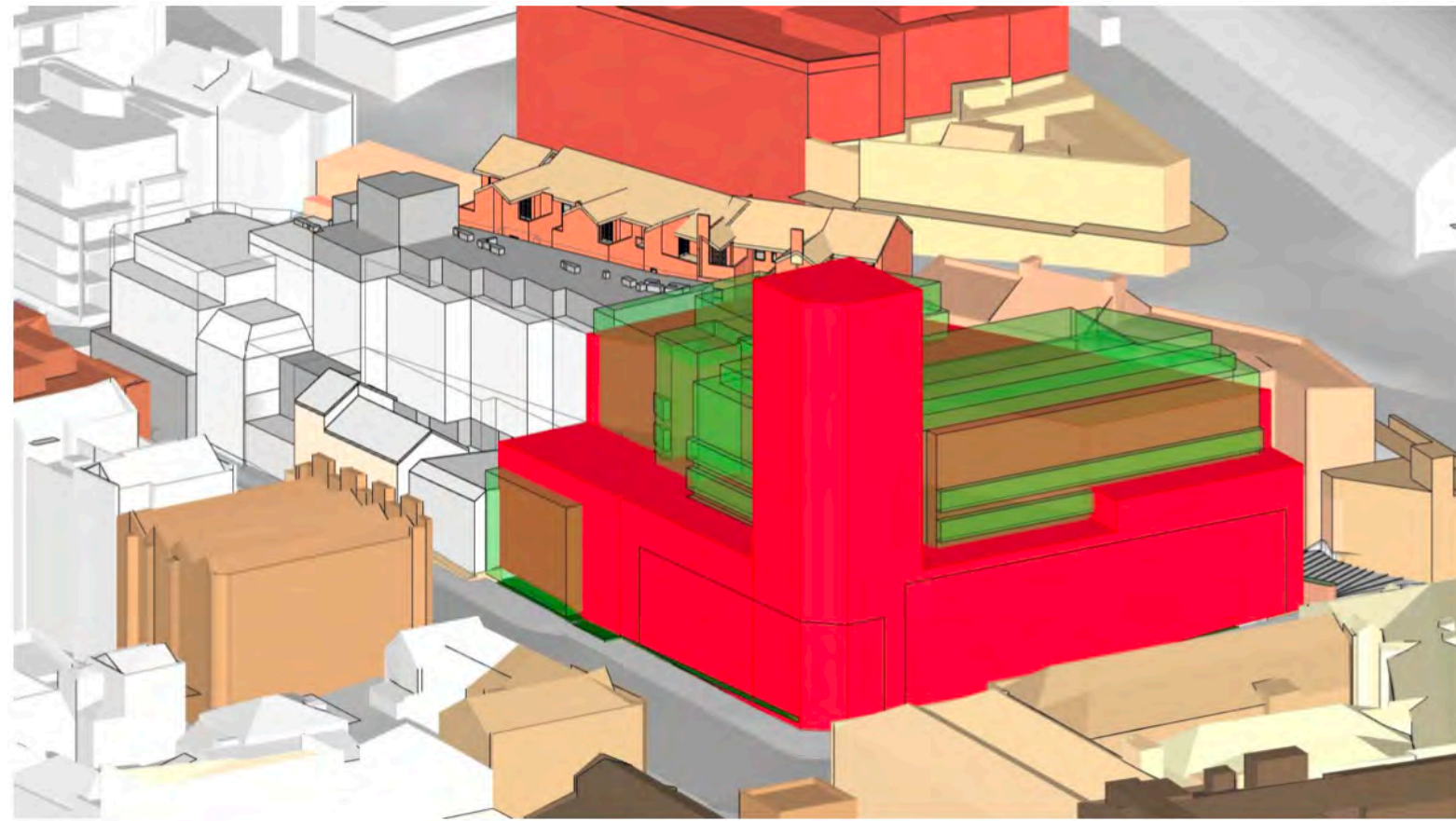


3pm

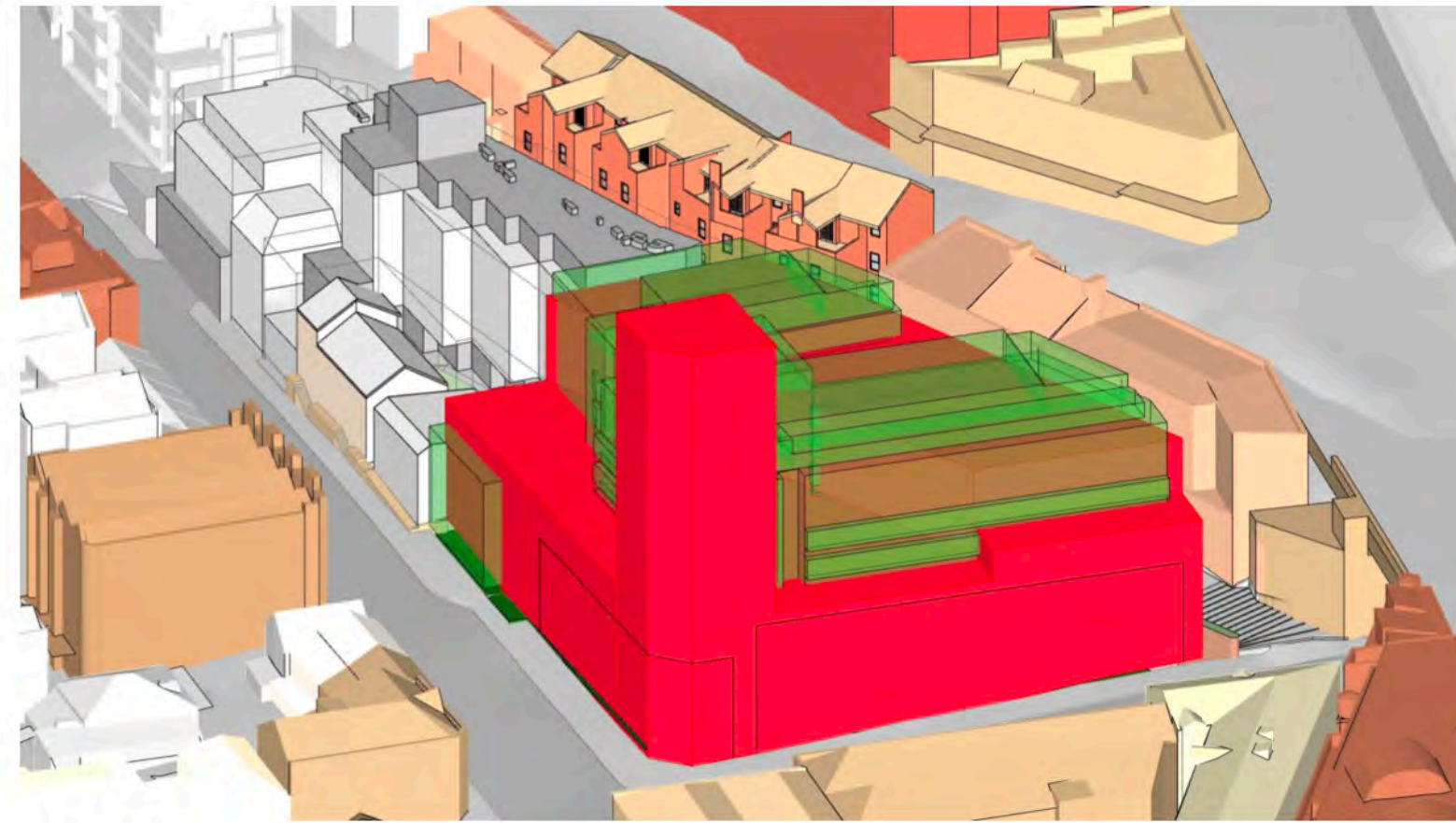
Legend
Green with black outline is proposed 35-55 control envelope
Orange outline is the existing lift overrun and additional envelope mass above 75 Harrington Street.

Overshadowing - Sun's Eye Views

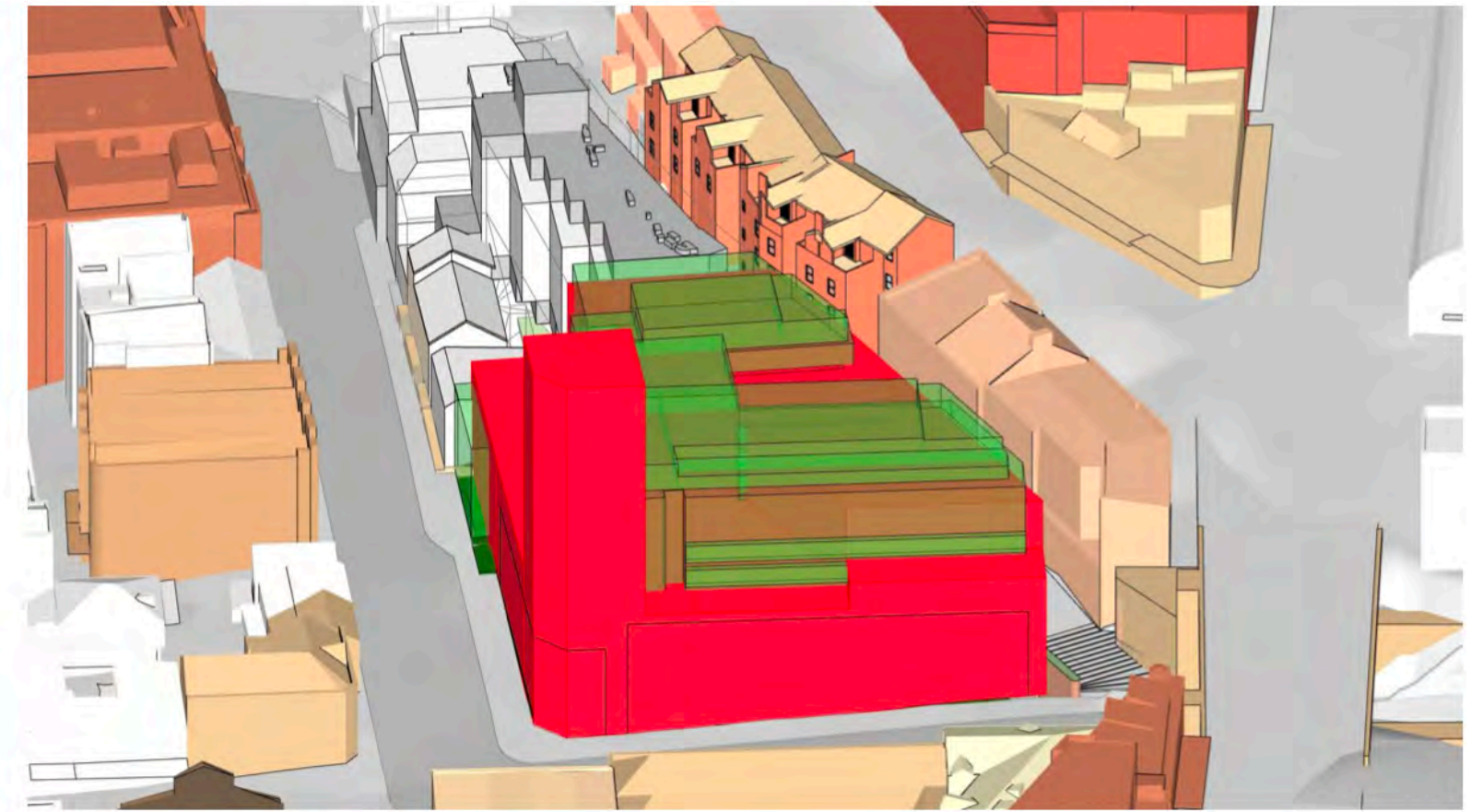
June 21st 9am-3pm: Proposed Envelope relative to Existing Control Envelope



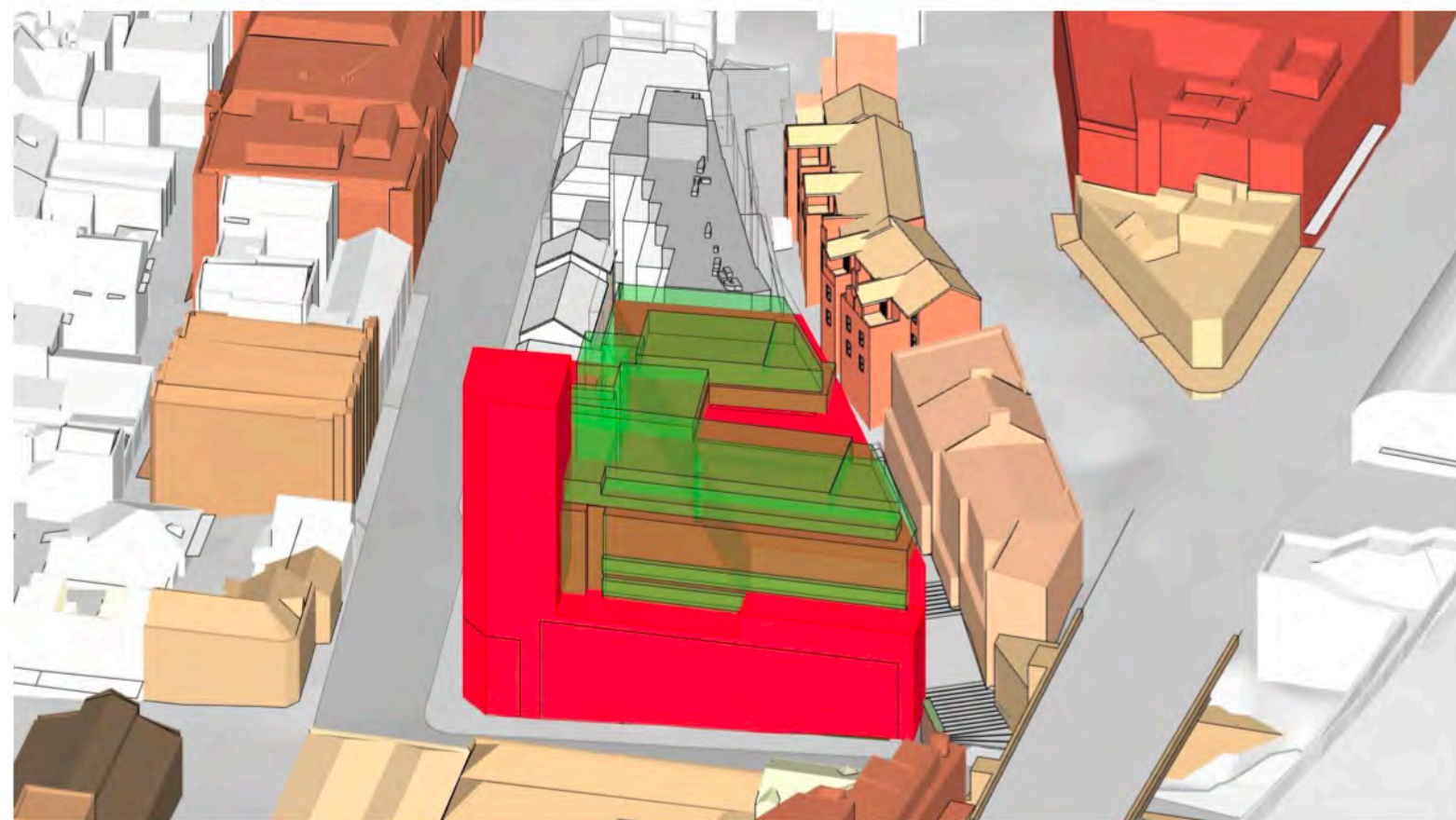
9am



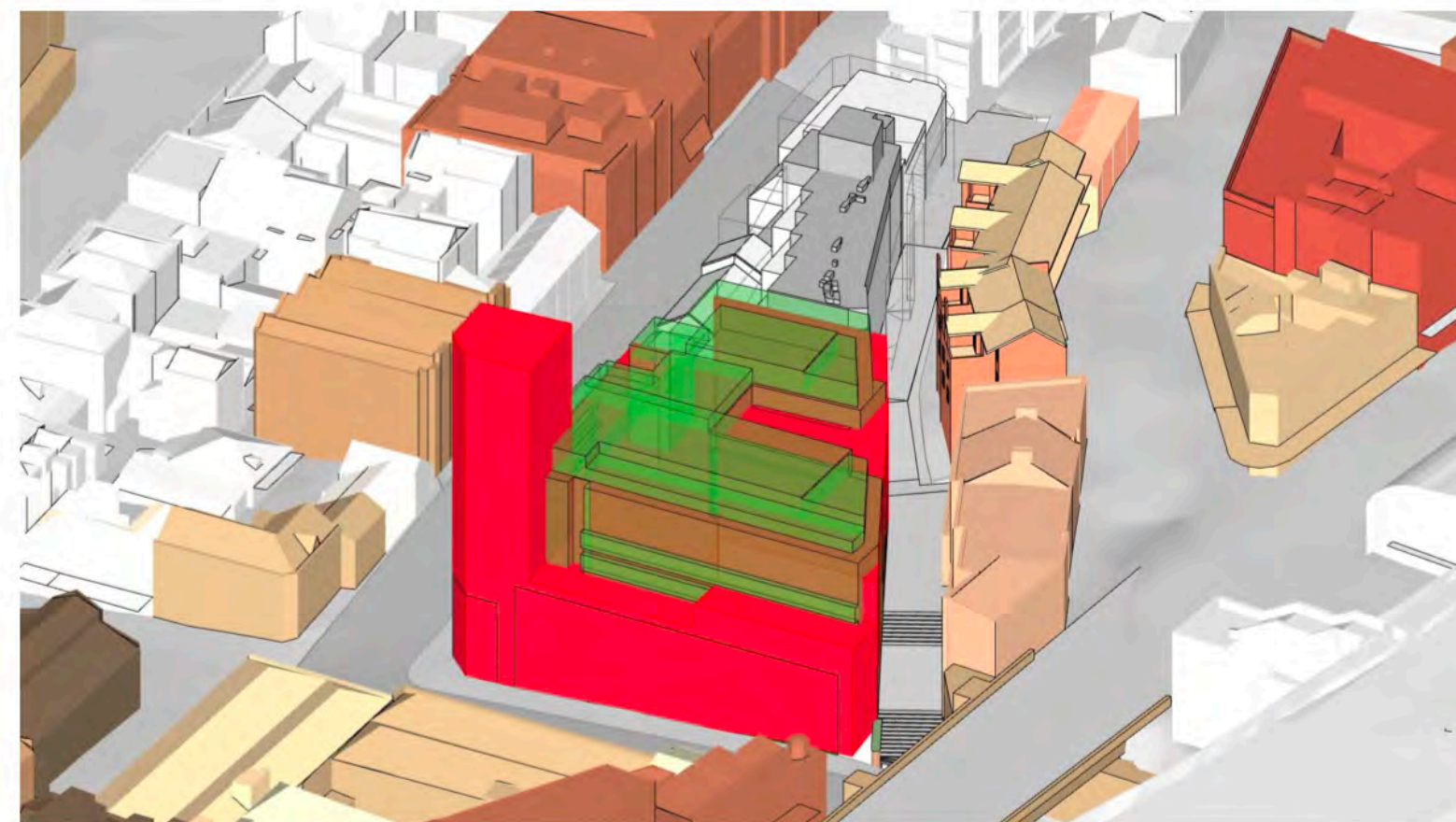
10am



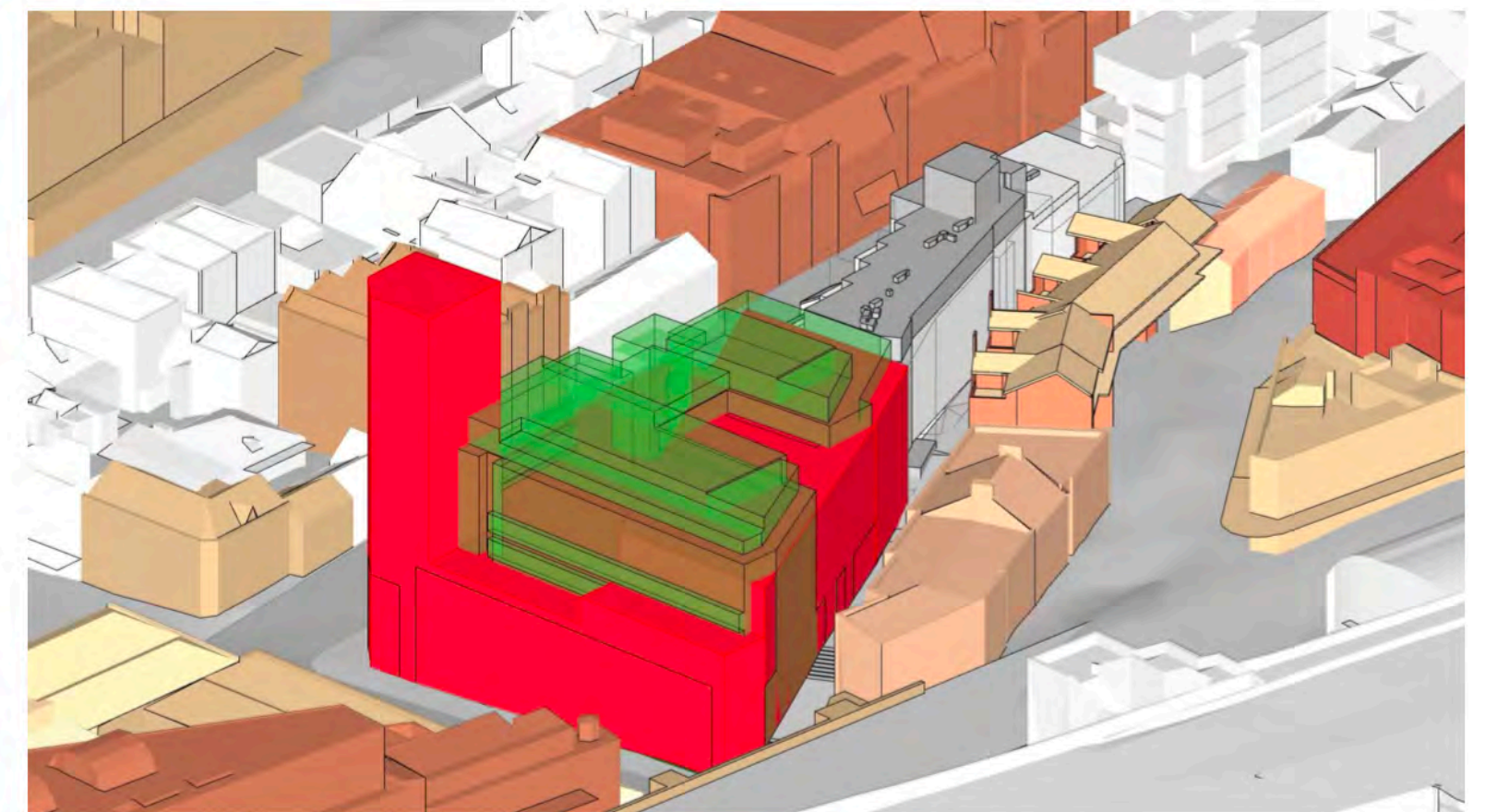
11am



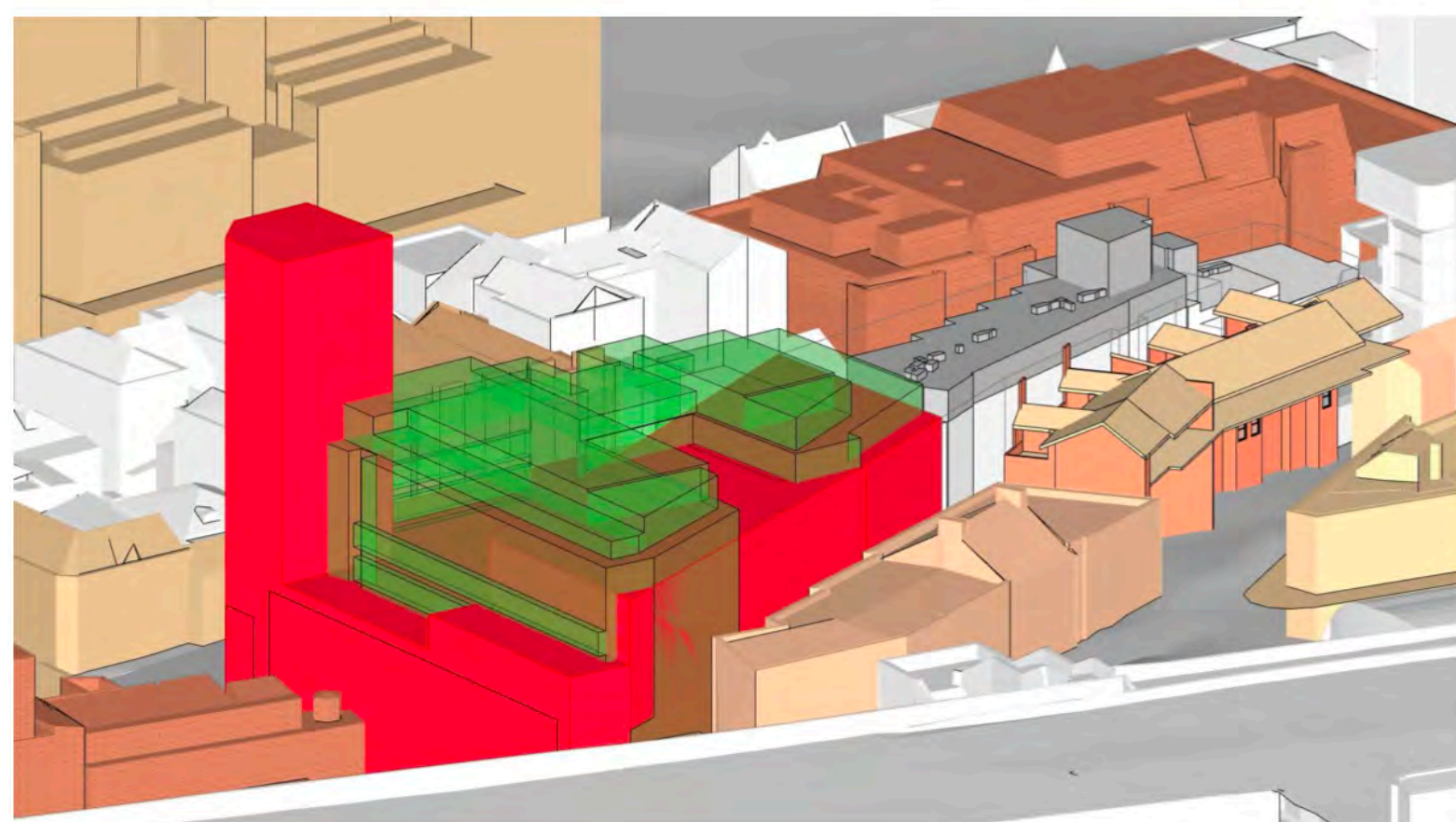
12pm



1pm



2pm



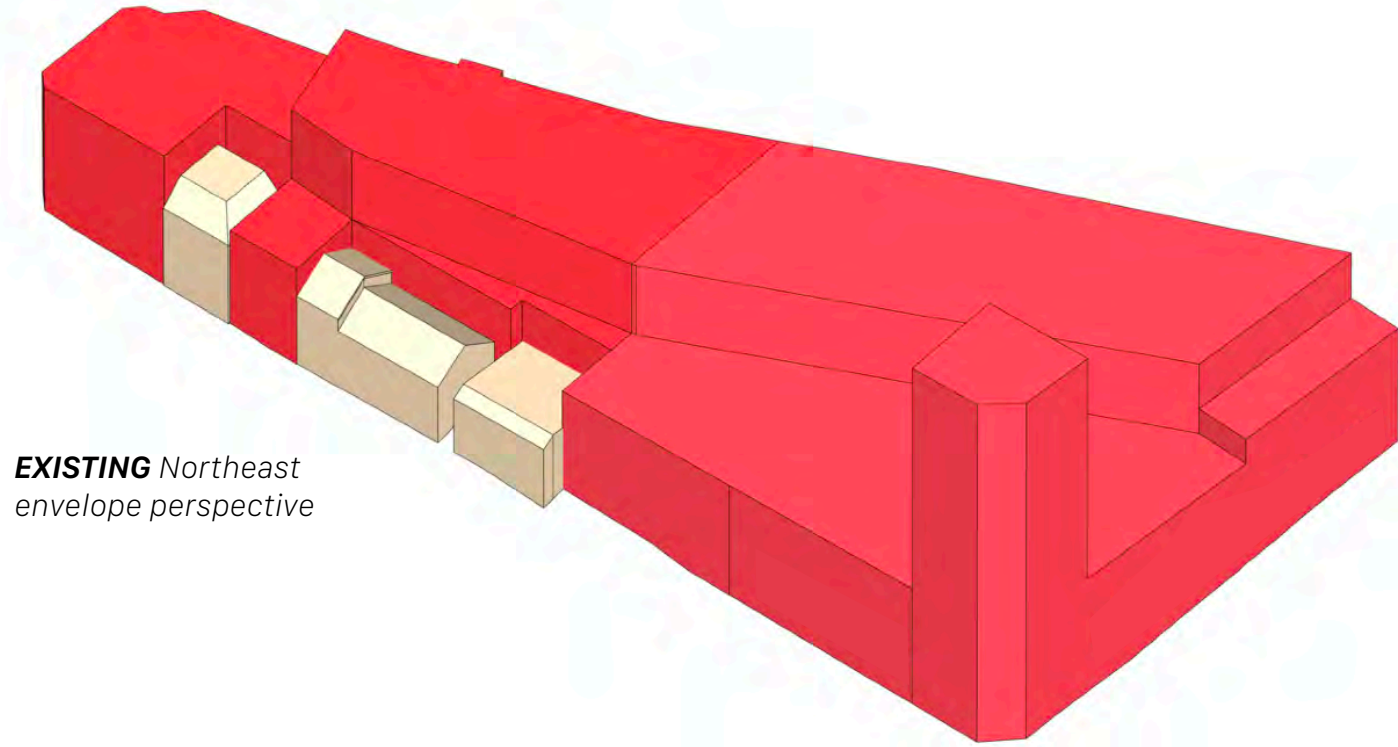
3pm

Envelope
Summary

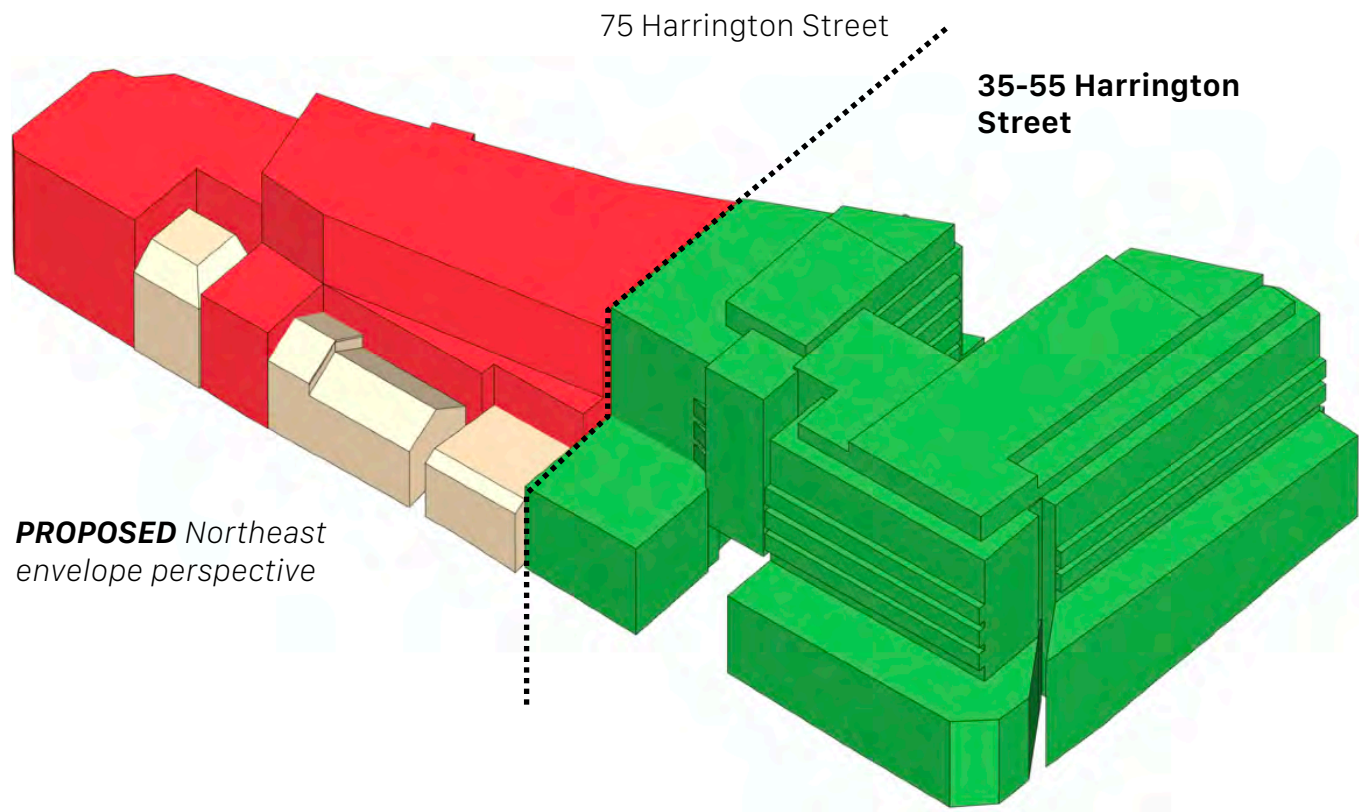
The proposed control envelopes key comparisons relative to the existing envelope controls;

- A Volume and GFA neutral envelope
- Nil adverse additional overshadowing to the Gloucester Street residential terraces
- Restoration of the heritage streetscape scale and character to all street frontages
- Greater though-site connectivity, informed by desire lines
- Increased inside-boundary public domain space via 3 new publicly accessible spaces and the through-site links
- Neutral sun access and sky view factor to surrounding public domain

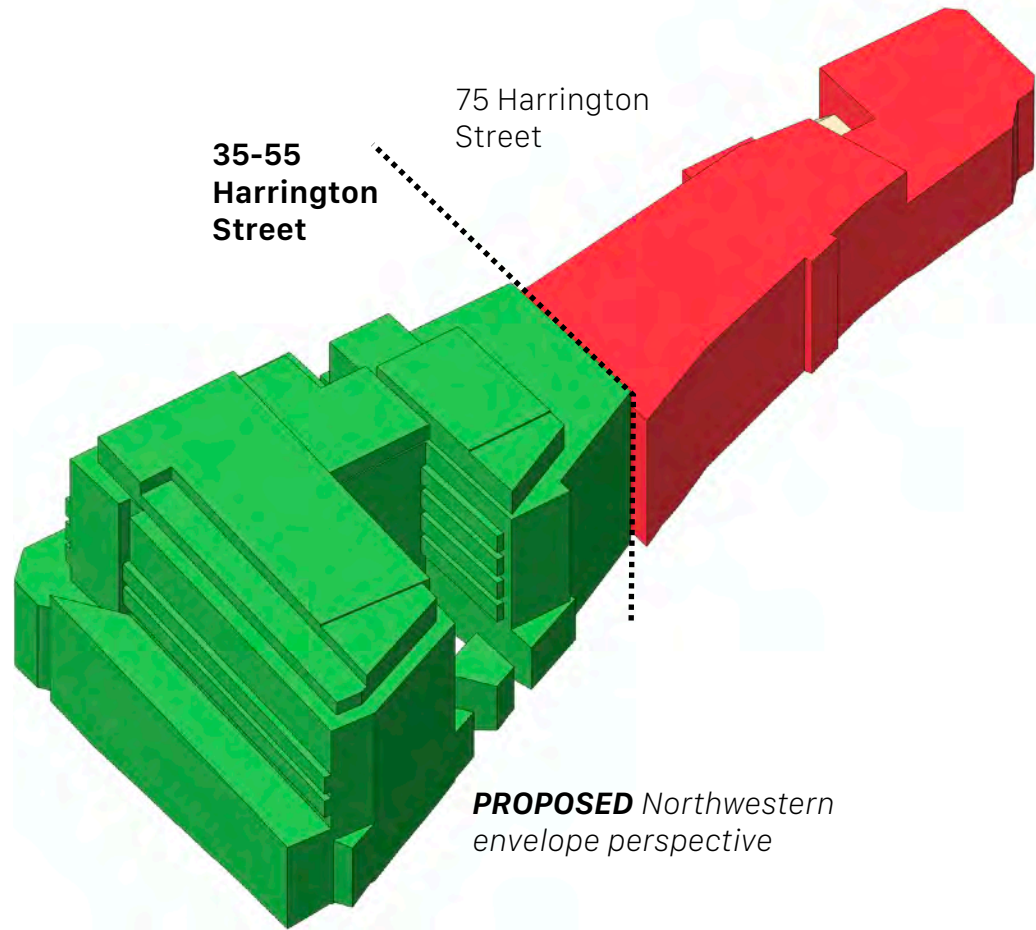
- Increased daylight amenity to Cambridge street
- Enhanced retail access and activation to all street fronts including Cambridge street
- DDA access through the site
- Opportunities to continue the exciting public art walk within The Rocks
- Opportunities for First Nation design framework and narrative exploration, beyond those already embedded in the reference scheme design
- Resolution of envelope discrepancies in 75 Harrington Street



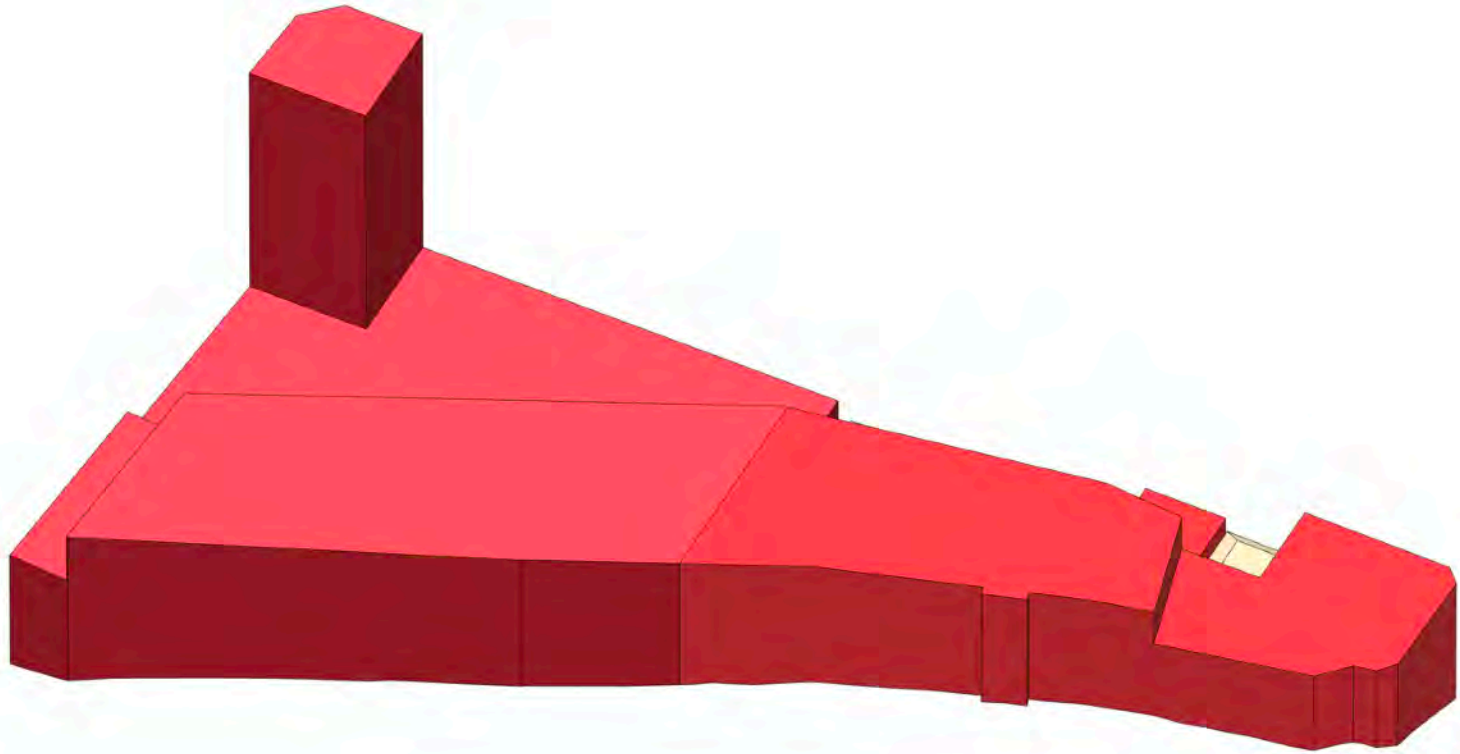
EXISTING Northeast envelope perspective



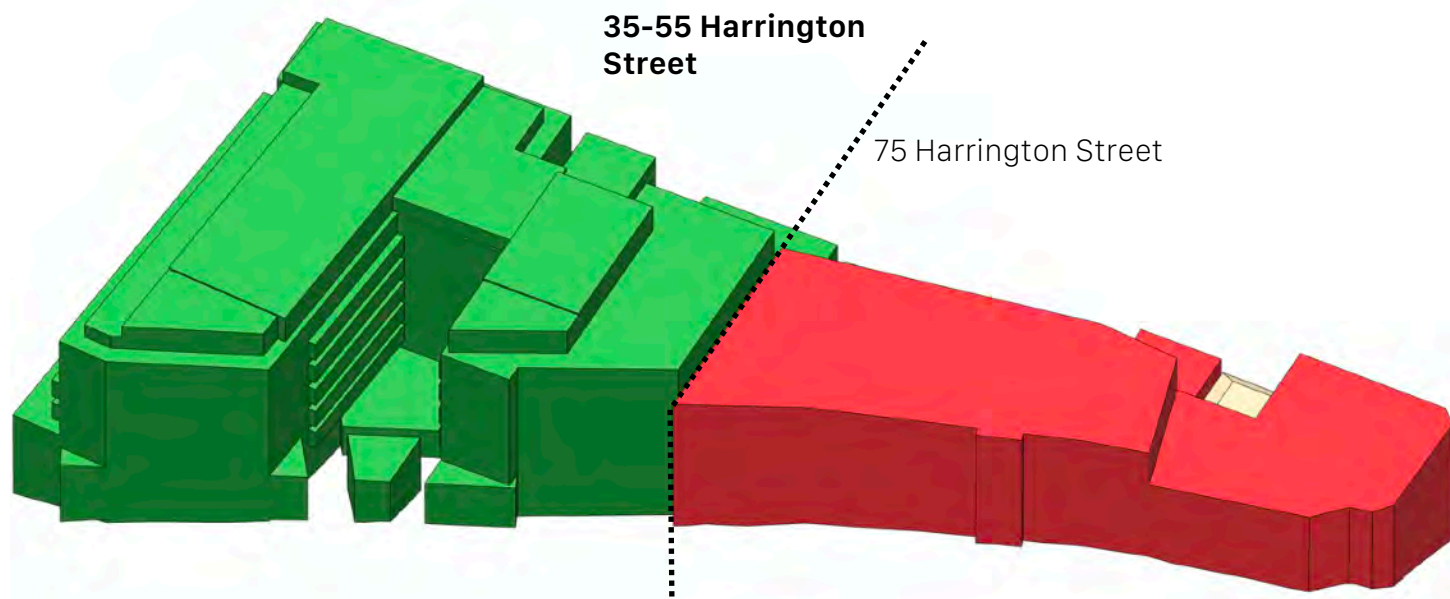
PROPOSED Northeast envelope perspective



PROPOSED Northwestern envelope perspective



EXISTING Western (Cambridge Street) envelope perspective



PROPOSED Western (Cambridge Street) envelope perspective



The through-site links and public spaces



The "Meeting Place" off Harrington Street



Harrington Street perspective



Argyle-Harrington Street intersection perspective



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12 October 2022

2210847

Minoshi Weerasinghe
Senior Planning Officer
Key Sites Assessments
Department of Planning and Environment
4 Parramatta Square,
12 Darcy Street
PARRAMATTA NSW 2150

Dear Ms Weerasinghe

**RE: PRELIMINARY VISUAL IMPACT ASSESSMENT TO SUPPORT SCRA AMENDMENT
35 – 55 HARRINGTON STREET, THE ROCKS**

This preliminary Visual Impact Assessment (**VIA**) has been prepared on behalf of Far East Rocks Pty Ltd in support of a proposal to amend the existing building envelope on land at 35-55 Harrington Street, The Rocks (**the site**) under the *Sydney Cove Redevelopment Authority Scheme (SCRA)*. The SCRA amendment is proposed to facilitate the future redevelopment of the site for a new hotel development.

This preliminary VIA accompanies the SCRA envelope amendment. It is intended to identify whether the proposed envelope results in a significant, unacceptable visual impact, considering impact on views overall. Photomontages showing the proposed envelope from a selection of public viewpoints has informed this preliminary assessment (refer to **Attachment A**).

A comprehensive VIA will accompany the Environmental Impact Statement that will seek consent for the detailed design of the proposed hotel development.

1.0 Background

1.1 Site Description

The site is located at 35-55 Harrington Street, The Rocks and is legally described as Lot 1 in Deposited Plan 775889. It is located in the City of Sydney local government area (**LGA**).

The site has an area of 2,350 square metres and is trapezoidal in shape, having frontage of approximately 50m to Harrington Street, approximately 50m to Argyle Street, approximately 55m to Cambridge Street and approximately 28m to its southern boundary.



Figure 1: Site aerial

Source: Ethos Urban and Nearmaps

The site is occupied by a seven (7) storey mixed use building comprising 2,195 square metres of retail premises over two (2) storeys (ground and first storeys) and 5,614 square metres of office premises over five (5) storeys. 138 car parking spaces are provided over two (2) basement levels (beneath the building and the adjacent Rendezvous Hotel). The building was completed in 1989.

The building has a perimeter block form, being built to each of its street alignments and southern boundary. The centre of the building is an open to the sky courtyard. Due to the lack of gradient change in this location, the Harrington Street frontage has a consistent 4 storey height. Conversely, due to its slope, the Argyle Street frontage is 3 storeys at its eastern end and 4 storeys at its western end. The Cambridge Street frontage is 4-5 storeys. Its form along the northern end of Cambridge Street steps down in response to slope.

The clocktower structure at its Argyle Street and Harrington Street corner is a distinct departure from its generally restrained form and style, is visually prominent and a landmark in The Rocks. The clocktower structure marks the entrance to the retail part of the building, which comprises an internally focussed food-court with a 2 storey void above and a mezzanine level.

The site rises by approximately three (3) storeys from the lowest point in the northeast corner of the Argyle Street and Harrington Street intersection to the southwest corner of Cambridge Street (FJMT, 2022).

1.2 VIA Relevant planning framework

Relevant parts of the planning framework for visual impact are identified below.

- legislation and regulations
- environmental planning instruments
- development control plans
- Land and Environment Court planning principles.

1.2.1 Legislation and regulations

Environmental Planning and Assessment Act 1979

Relevant to VIA, object (g) of the EP&A Act is 'to promote good design and amenity of the built environment'.

This requires address of amenity. DPE defines amenity as 'the pleasantness, attractiveness, desirability or utility of a place, facility, building or feature' (DPE, 2022).

Visual amenity is a sub-set of amenity. The GLVIA3 defines visual amenity as 'the overall pleasantness of the views people enjoy of their surroundings, which provides an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating, visiting or travelling through an area'.

Under clause 4.15 (1) of the EP&A Act, the following matters must be taken into consideration where relevant when determining a development application:

- (b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality
- (e) the public interest.

Heritage Act 1977

Of relevance for visual impact, through its objects and other provisions, the Heritage Act 1977 requires particular consideration of heritage items and heritage conservation areas.

Environmental Planning and Assessment (Sydney Cove) Savings and Transitional Regulation 1999

The Environmental Planning and Assessment (Sydney Cove) Savings and Transitional Regulation 1999 requires a range of matters to be addressed when proposing to amend the existing planning controls for land in The Rocks. Relevant for VIA, these include ensuring development will not adversely affect a range of matters, including heritage significance and quality of the public domain, and is consistent with the general planning and design principles for the area.

1.2.2 Strategic plans

As the proposal involves amendment to the SCRA, which is a deemed SEPP, strategic plans under the EP&A Act are relevant considerations.

The relevant strategic plans are:

- **Region Plan:** The Greater Sydney Region Plan – A Metropolis of Three Cities (the Region Plan)
- **District Plan:** The Eastern City District Plan (the District Plan)
- **Local strategic planning statement:** City Plan 2036.

While not a strategic plan under the EP&A Act, the Central Sydney Planning Strategy is also relevant. It provides a more Central Sydney specific address of key strategic planning matters, and arguably can be regarded as the 'true' LSPS for Central Sydney. It has also informed recent amendment to the Central Sydney planning framework, comprising the Sydney Local Environmental Plan 2012 (**SLEP2012**) and the Sydney Development Control Plan 2012 (**SDCP2012**).

1.2.3 Environmental planning instruments

Biodiversity and Conservation SEPP 2021

Chapter 10 of the Biodiversity and Conservation SEPP 2021 covers Sydney Harbour and its waterways, foreshores and catchment.

Under this SEPP, the site is included in:

- the Foreshores and Waterways Area
- the City Foreshores Area (a Strategic Foreshore Site).

Of note, the western boundary of the Foreshores and Waterways Area extends to the eastern edge of Cahill Walk.

In terms of visual impact, the SEEP requires consideration of a small number of matters, including:

- ensuring development that is visible from the waterways or foreshores maintain, protect and enhance the unique visual qualities of Sydney Harbour
- increasing the number of publicly accessible vantage points for viewing Sydney Harbour
- ensuring development does not detract from the character of waterways and adjoining foreshores
- minimising adverse impacts on views and vistas to and from public places, landmarks and heritage items.

Sydney Cove Redevelopment Authority Scheme (SCRA)

The Sydney Cove Redevelopment Authority (**SCRA**) Scheme was prepared under the former Sydney Cove Redevelopment Authority Act 1968. It is a deemed SEPP under schedule 6 of the EP&A Act (Urbis, 2021).

The SCRA Scheme contains a number of building site control drawings (**BSCD**). The relevant BSCD for the site is Drawing XXXVI (1) (refer **Figure 2**). Consistent with that for many other sites in The Rocks, the BSCD limits site coverage, height and provides for two (2) pedestrian through site links. As can be seen, site cover and building height largely aligns with the existing building. Maximum building height across most of the site is RL35.5 metres, while part of the site has a lower maximum building height of RL27 metres. The north-south through-site link is provided through the retail arcade, and the east-west through site link is provided under the Rendezvous Hotel.

As there are no aims or objectives supporting the building site control drawings, or other supporting material, the intent of the BSCDs cannot be confirmed.

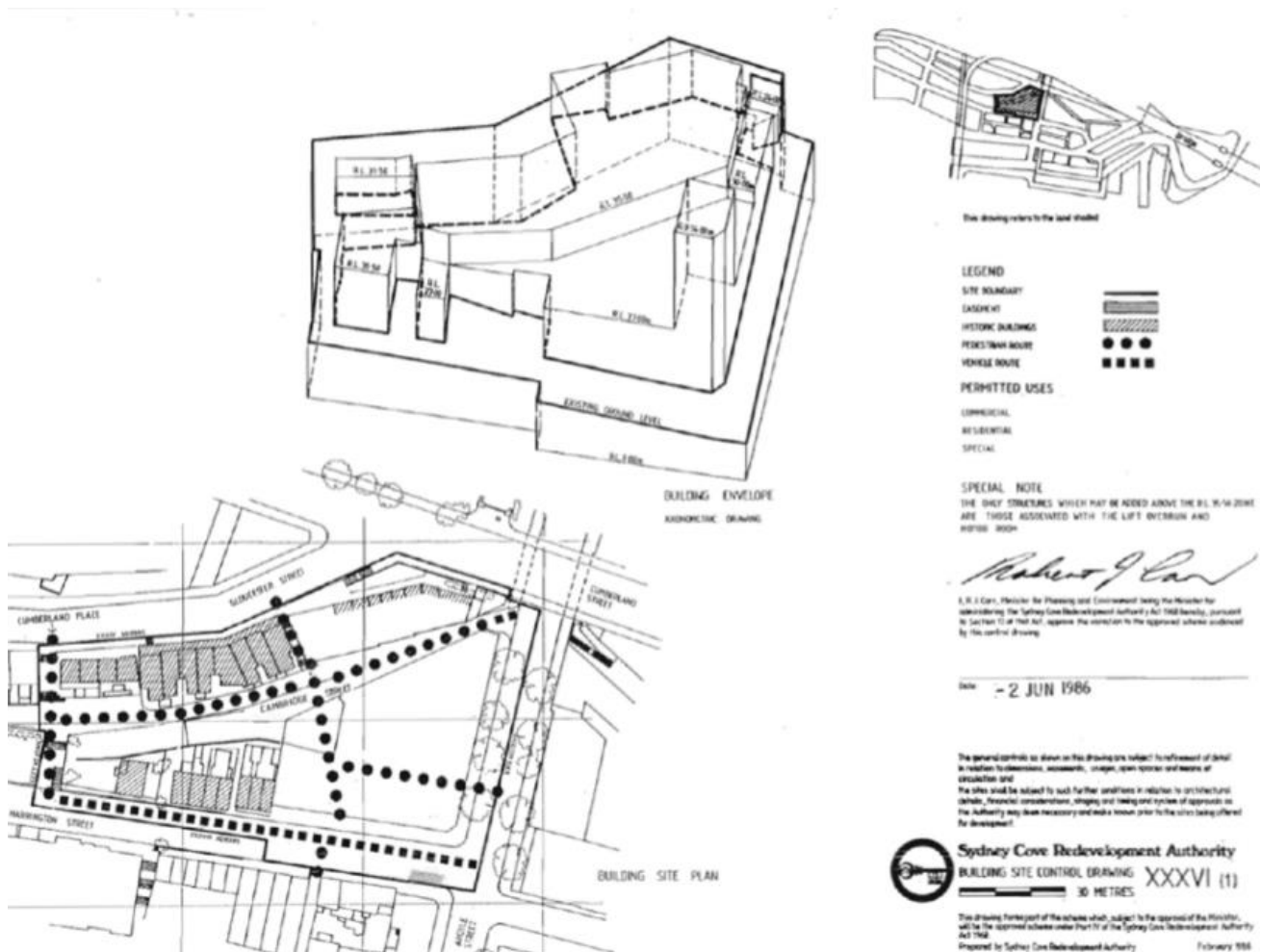


Figure 2 – Sydney Cove Redevelopment Authority Scheme envelope controls

Source: FJMT and Sydney Cove Redevelopment Authority Scheme

Sydney Local Environmental Plan 2012

While the Sydney Local Environmental Plan 2012 (**SLEP2012**) does not apply to the site or The Rocks, it is nonetheless of interest as it implements the intent of the Central Sydney Planning Strategy with regard to views.

Clause 4.3 (1)(c) implements the CSPA intent to avoid protecting existing private views:

- ‘to promote the sharing of views outside Central Sydney’.

6.16 (1) (d) requires that tall buildings (those over 55m in height) ‘provide adequate outlook for occupants of new buildings’.

Section 6.19 implements protection of key views from public places. Its objectives are:

- (a) to preserve significant views from public places
- (b) to ensure development does not obstruct public views.

Development consent must not be granted to a building intruding within a number of ‘view planes’, including the Sydney Observatory view to Macquarie Lighthouse at Vaucluse view protection plane.

Section 6.19 (A) protects views to the north and west of Sydney Harbour from:

- the Observatory Hill Rotunda
- a point in the north west quadrant of Observatory Hill, east of the fig trees

- a point west of the Cahill Expressway corkscrew off ramp.

Sydney Harbour Foreshores and Waterways Area Development Control Plan

The Sydney Harbour Foreshores and Waterways Area Development Control Plan (the **SDCP**) applies to the Foreshores and Waterways Area as identified by the SREP.

Its aims are:

- protecting ecological communities within the area covered by SREP (Sydney Harbour Catchment) 2005
- ensuring that the scenic quality of the area is protected or enhanced
- providing siting and design principles for new buildings and waterside structures within the area
- identifying potential foreshore access locations in the area.

It seeks to achieve this aim by establishing performance-based criteria and guidelines relating to matters such as foreshore access, visual and natural environments, recreation and maritime industrial uses.

Under section 1.4 iv, an EIS must address 'visual impact having regard to the landscape character of the area and nature of the proposal'.

Section 3.1 identifies that the visual impact of a development will vary depending on:

- the nature of the proposal – its height, width, siting, scale, colour, reflectivity and function
- the landscape setting in which it is proposed
- the degree of change created – whether it will be minimal or not
- the ability of the proposal to integrate with the landscape character.

As the site and The Rocks are not included in a Landscape Character Type, the general aims of section 3.2 apply. These are as follows:

All development should aim to:

- minimise any significant impact on views and vistas from and to:
 - public places,
 - landmarks identified on the maps accompanying the DCP, and
 - heritage items;
- ensure it complements the scenic character of the area;
- protect the integrity of foreshores with rock outcrops, dramatic topography or distinctive visual features;
- provide a high quality of built and landscape design; and
- contribute to the diverse character of the landscape.

Section 5.4 – Built form of Part 5 Design Guidelines for Land-Based Developments is also applicable. These are as follows:

- where buildings would be of a contrasting scale or design to existing buildings, care will be needed to ensure that this contrast would enhance the setting;
- where undeveloped ridgelines occur, buildings should not break these unless they have a backdrop of trees;
- while no shapes are intrinsically unacceptable, rectangular boxy shapes with flat or skillion roofs usually do not harmonise with their surroundings. It is preferable to break up facades and roof lines into smaller elements and to use pitched roofs;
- walls and fences should be kept low enough to allow views of private gardens from the waterway;
- bright lighting and especially floodlighting which reflects on the water, can cause problems with night navigation and should be avoided. External lights should be directed downward, away from the water.

Australian Standards AS/NZ1158.3: 1999 Pedestrian Area (Category P) Lighting and AS4282: 1997 Control of the Obtrusive Effects of Outdoor Lighting should be observed;

- use of reflective materials is minimised and the relevant provisions of the Building Code of Australia are satisfied;
- colours should be sympathetic with their surrounds and consistent with the colour criteria, where specified, for particular landscape character types in Part 3 of this DCP;
- the cumulative visual impact of a number of built elements on a single lot should be mitigated through bands of vegetation and by articulating walls and using smaller elements; and
- the cumulative impact of development along the foreshore is considered having regard to preserving views of special natural features, landmarks or heritage items.

Sydney Development Control Plan 2012

As with the SLEP2012, while the SDCP2012 does not apply to the site or The Rocks, it is nonetheless of interest as it also implements the intent of the Central Sydney Planning Strategy with regard to views.

While amendments to the SDCP2012 to give effect to the CSPS have as yet not been published, based on the planning proposal for the CSPS (City of Sydney, 2021), relevant objectives are likely to be:

- (a) to identify and preserve significant public views from public places
- (b) to ensure the silhouette created by existing clock towers, turrets and roof features on heritage listed items are clearly visible against the sky
- (c) to require development to respond to public views to Sydney Harbour by improving the view through building modulation
- (d) to require development to respond to significant public views from public places by enhancing views through, building modulation and/or high-quality materials, finishes and design excellence

It is also understood that the SDCP2012 also seeks to protect views from the Sydney Observatory to Fort Denison (refer **Figure 3**).



Figure 3: Excerpt of Sydney DCP's Public Views Protection Map 2

Source: SDCP2012

1.3 Relevant planning decisions

85 Harrington Street

Under former section 89H of the EP&A Act, on 12 January 2018 the Independent Planning Commission granted consent to a mixed use development comprising residential and commercial uses (SSD-7037) on land located at 85 Harrington Street and 68-72 Gloucester Street (including a variation to the Sydney Harbour Redevelopment Authority Scheme) located approximately 55m to the south of the site. The approved allowed two (2) buildings, one of six (6) storeys (north building) and one of eight (8) storeys (south building) (refer **Figure 4**).

Visual impact on its immediate surrounds and wider context was identified as a key issue. In particular, 'the key issue is whether the proposed building heights and design are visually compatible with the historic character of neighbouring buildings and surrounding streetscapes'.

The Department considered visual impact on its immediate surrounds acceptable:

- 'The Department considers the proposed built form of the development, as revised through the assessment process, will sit comfortably within the surrounding heritage context and will provide an attractive and visually interesting built form that is sympathetic to the overall character of The Rocks. Although the proposal will have some impacts on existing views from commercial uses and hotels, the Department considers the impacts to be acceptable'.

In respect of visual impact on its wider context, the City of Sydney contended that impacts would be unacceptable, particularly when seen from the Sydney Opera House and East Circular Quay. The Department did not support this concern:

- 'While the Department acknowledges the upper levels of the proposed buildings will be visible to varying degrees from these locations, the visual impacts are considered negligible given the distances involved and the relationship of the proposed development to surrounding buildings. In particular, the Department notes views of the development from East Circular Quay and the SOH will be substantially obscured by the Museum of Contemporary Art and the DFS Galleria Building'.



Figure 4 – 85 Harrington Street

Source: Golden Age

Museum of Contemporary Art

Under the former Part 3A of the EP&A Act, on 26 June 2009 the Minister for Planning granted consent to the upgrade of the Museum of Contemporary Art (Application Number MP08_0064) on land located at 140 George Street, The Rocks approximately 90m to the southeast of the site. The proposal involved a contemporary addition to the existing older building (refer **Figure 5**).

The proposal impacted public views obtained from the Circular Quay promenade to the Sydney Harbour Bridge.

The DPE assessment concluded:

- 'the views and vistas resulting from the proposed addition to the MCA are typical to the locality, that is, views enjoyed through layers of streets, thoroughfares and buildings. The...justification for view impacts is considered reasonable'.

The proposal also impacted private views obtained from all rooms in the Harbour Rocks Hotel. This included obscuring views to the Sydney Opera House from over half of these rooms. While DPE recommended further detailed design work be undertaken 'to result in an improvement to the level of view loss identified', it was also 'accepted that there will be a degree of view loss as a result of the proposal'. It was concluded that 'through further consultation with the Harbour Rocks Hotel and the consideration of view sharing principles any view loss would be acceptable'.



Figure 5 – Museum of Contemporary Art

Source: Museum of Contemporary Art

Sirius site

Under part of the EP&A Act, on 18 June 2021 DPE granted consent to alterations, restoration and additions to the Sirius building (SSD-10384) on land located at 2-60 Cumberland Street located approximately 110m to the north of the site. The approval enabled an additional 1,881.38 square meters of GFA and an addition 5.4 metres of building height. Of note, the approved building height is inconsistent with the relevant schedule of State Environmental Planning Policy (State Significant Precincts) 2005 (the relevant environmental planning instrument for the site).

DPE concluded the proposal is satisfactory for the following reasons:

- 'while the proposal exceeds the height controls in State Environmental Planning Policy (State Significant Precincts) 2005, the Department is satisfied the proposed height is acceptable as it would only result in a minor (1-3 storey) increase above the existing building, retains the existing architectural character of the building and protects significant views to the Sydney Opera House'

- 'the restoration and refurbishment works respect the heritage significance of the existing Sirius building and the surrounding heritage items and the proposal would have negligible visual impacts on the Sydney Opera House and Sydney Harbour Bridge'
- 'it provides a high level of residential amenity for apartments in accordance with the ADG, and would not result in any unreasonable impacts to surrounding properties in terms of view loss'.



Figure 6 – Sirius redevelopment

Source: BVN

2.0 Proposed SCRA Amendment

The proposed envelope is shown in **Figure 7**. It seeks maximum podium height ranging from RL 23.15 to RL 23.70 and a maximum RL of 40.70. The proposed envelope amendment is intended to facilitate redevelopment of the site for a 285-room international standard hotel.

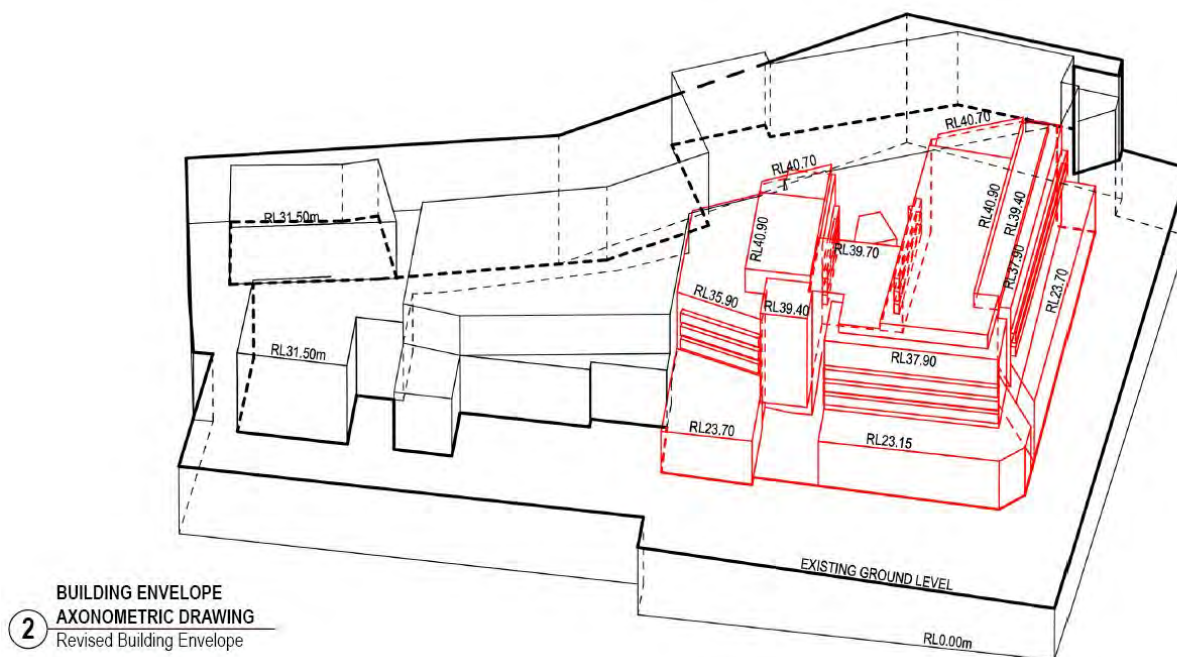


Figure 7 – Proposed envelope amendment

Source: FJMT

3.0 Methodology

The purpose of this preliminary VIA is to identify whether the proposed envelope results in a significant, unacceptable visual impact, considering impact on views overall.

Consideration of visual impact is inherently subjective, and involves professional value judgements. As noted by the Land and Environment Court of New South Wales (the LEC) in *Rose Bay Marina Pty Limited v Woollahra Municipal Council* and anor [2013] NSWLEC 1046 (**Rose Bay**), the key to addressing this challenge is to adopt a rigorous methodology.

For impact on views obtained from the public domain, the methodology used by this VIA is derived from the international standard 'Guidelines for Landscape and Visual Impact Assessment' version 3 (**GLVIA3**), the NSW Land and Environment Court (**LEC**) planning principle for 'impact on public domain views' established in *Rose Bay Marina Pty Limited v Woollahra Municipal Council* and anor [2013] NSWLEC 1046 (**Rose Bay**).

Under this methodology, VIA is undertaken in three (3) main stages:

1. preparation of the evidence base
2. identification, description and assessment of visual impact
3. assessment of visual impact against relevant matters in the planning framework.

Significance of visual impact has been determined through analysis of photomontages considering the factors of sensitivity and magnitude. These factors have informed this preliminary assessment of visual impacts and will be set out in detail in the detailed VIA.

4.0 Viewpoints

Sixteen viewpoints in the public domain were selected for an assessment of visual impacts arising from the proposed envelope amendment. **Table 1** identifies their location and provides an outline of key, relevant attributes. **Figure 7** and **Figure 8** below shows the location of these viewpoints.

Table 1: Viewpoints

Number	Viewpoint	Distance	Type	Significance	Key notes
1.	Overseas Passenger Terminal Forecourt	Medium range	Townscape	Not significant	Highly visited location
2.	Argyle & George Street	Medium range	Streetscape	Not significant	Threshold entry to The Rocks from east
3.	Playfair Markets	Close range	Streetscape	Not significant	Key gathering and social interaction area
4.	Argyle & Playfair Streets	Close range	Streetscape	Not significant	Impact on heritage streetscape
5.	Glenmore Rooftop	Close range	Townscape	Not significant	Views to CBD towers in background. Level of screening by street canopy in foreground.
6.	Argyle Bridge	Close range	Streetscape	Not significant	Level of screening by street tree canopy
7.	Bridge Stairs	Medium range	Townscape	Moderate significance	View to Sydney Opera House and harbour.
8.	Cahill Walk (north)	Medium range	View line or corridor	Not significant	The Sydney Harbour YHA conceals views to the Sydney Opera House and harbour
9.	Cahill Walk (south)	Medium range	View line or corridor	Moderate significance	View to Sydney Opera House
10.	Cambridge Street	Medium range	Townscape	Not significant	Laneway that is currently in average - poor condition
11.	Harrington Street	Close range	Streetscape	Not significant	Impact on heritage streetscape

Number	Viewpoint	Distance	Type	Significance	Key notes
12.	Argyle & Cambridge Streets	Close range	Streetscape	Not significant	Laneway that is currently in average - poor condition
13.	Observatory Hill	Long range	View line or corridor	Not significant	Moderately visited location for recreational purposes
14.	Cahill Walk (west)	Long range	View line or corridor	Not significant	Laneway that is currently in average - poor condition
15.	Cahill Walk (east)	Long range	View line or corridor	Moderate significance	Potential impact on Observatory Hill
16.	Sydney Opera House Forecourt	Long range	Townscape	Exceptional significance	Impact on Sydney Opera House setting

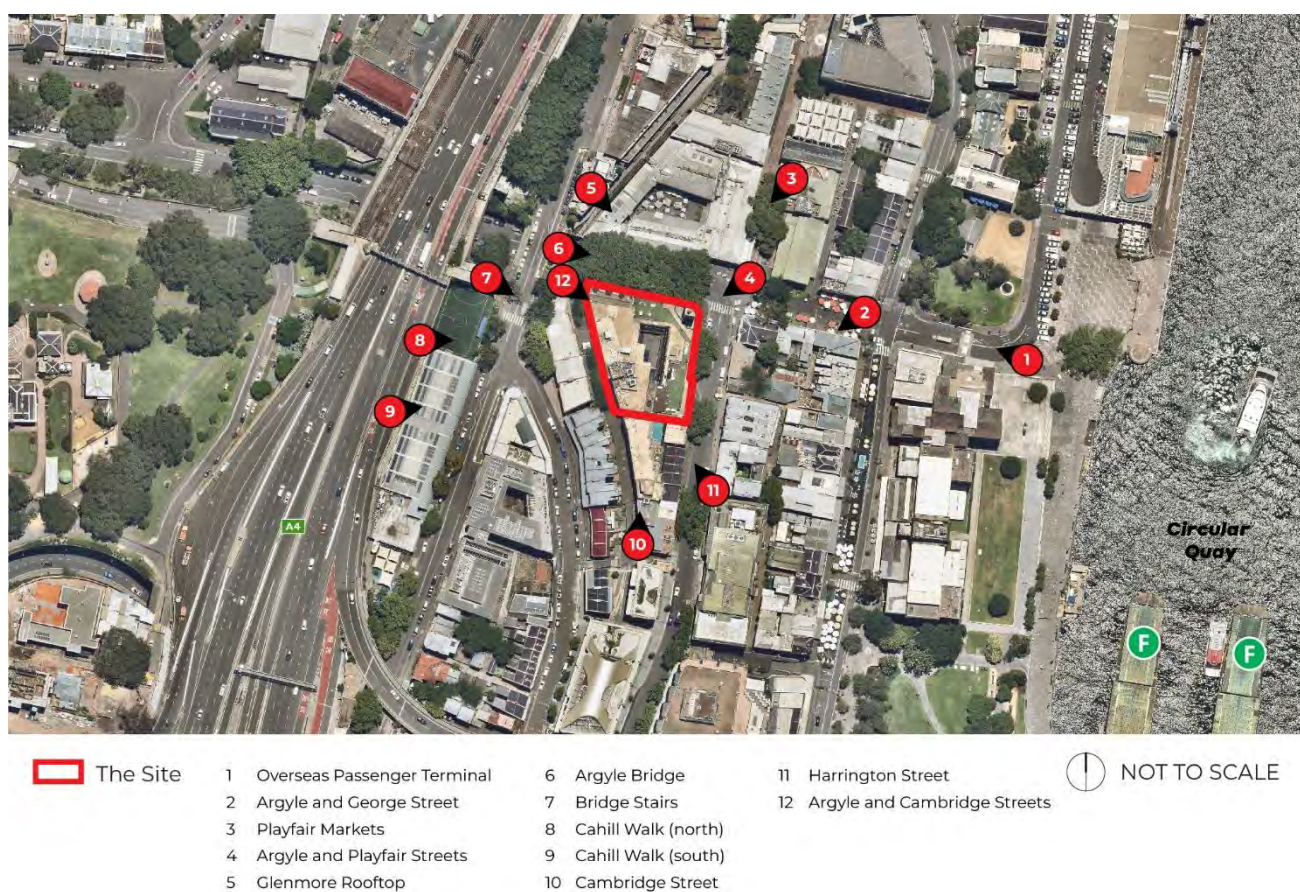


Figure 8: Viewpoints in the close and medium ranges

Source: Ethos Urban and Nearmaps



Figure 9: Viewpoints in the long range

Source: Ethos Urban and Nearmaps

5.0 Summary of Key Findings

Photomontages which show both the existing SCRA envelope and the proposed envelope from each of the viewpoints set out in **Section 4.0** of this preliminary VIA are provided in **Attachment A** and **Attachment B**. These photomontages have been assessed in accordance with the methodology set out in **Section 3.0** of this preliminary VIA. The key findings of this assessment are:

- Due to the relationship between natural and built factors, topography, the public domain and built form, in the longer range the proposed envelope would be most visible from viewpoints located to the south and east of the site. Given the steeper topography to the west, the envelope also becomes visible from the west in the medium range (along Cahill Expressway for example).
- The envelope would be visible by a range and large number of people in the immediate public domain, in particular those along the Harrington and Argyle intersection, given the significant corner interface and frontages afforded to these streets.
- Given the breadth and number of views, the envelope will be visible as a new element in the foreground, midground and background of various views.
- The proposed building envelope, when compared to the existing SCRA envelope, will present overall a more uniform built form that is less visually prominent (due to removal of the existing tower element) and will generally result in a similar or less level of view loss (compared to the SCRA envelope) in the public domain, to iconic elements in the landscape, such as water elements, the Sydney Opera House and the Sydney Harbour Bridge. Overall, the visual impact of the proposed envelope on the public domain viewpoints ranges from negligible to moderate, with the Argyle Stairs viewpoint being the only one to be given a moderate visual impact ranking. This is largely due to the scale of visual change that the proposed building envelope will enable. However, this is considered reasonable and acceptable for the following reasons:

- Visual change from this viewpoint is inevitable as a result of redevelopment of the site and does not automatically constitute an adverse visual impact.
- Any visual impacts can be adequately mitigated through the detailed design of the future building for the site (to be assessed at detailed DA stage).
- The degree of any view loss is minimal, and importantly the views of iconic landscapes (i.e the Sydney Opera House) obtained from this viewpoint will be retained.
- The envelope will not be visible from significant view locations including Observatory Hill, and will have a negligible to low visual impact on long range views. The SCRA envelope, by comparison, is visible and intrudes on views of the horizon from the selected long-range viewpoints.
- Additionally, key views from Observatory Hill to Macquarie Lighthouse, Vaucluse, and Fort Denison are not obstructed.
- The proposed envelope remains consistent with the broader strategic and statutory planning framework.

6.0 Conclusion and Next Steps

Based on these findings, it is considered that the visual impacts and view loss experienced from the public domain as a result of the proposed envelope are reasonable taking into account all relevant considerations. As such, it is the conclusion of this preliminary VIA that the proposed envelope amendment can be supported on the grounds of visual impact and view loss.

A detailed VIA which will assess the visual impacts from the public and private domain against the detailed building design within the proposed envelope will be undertaken and accompany Environmental Impact Statement seeking detailed approval for the proposed hotel development.

Yours sincerely,



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Attachment A – Public Domain Visual Impact Evidence

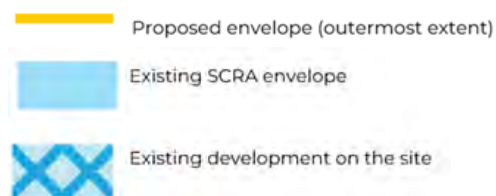


Figure 1 Overseas Passenger Terminal forecourt (Viewpoint 1) – existing SCRA envelope and proposed envelope

Source: Virtual Ideas

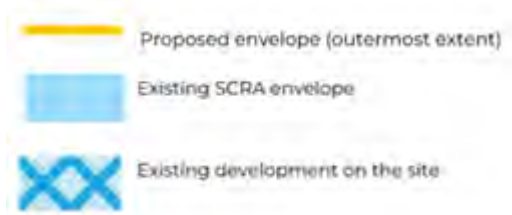


Figure 2 *Argyle & George Streets (Viewpoint 2) – existing SCRA envelope and proposed envelope*

Source: Virtual Ideas

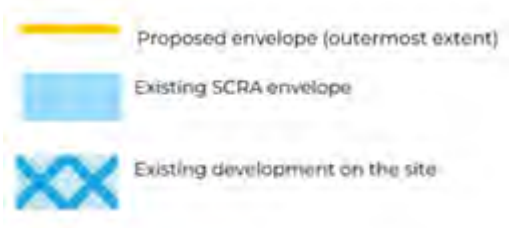


Figure 3 *Playfair Markets (Viewpoint 3) – existing SCRA envelope and proposed envelope*

Source: Virtual Ideas

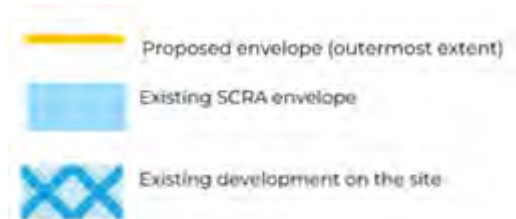


Figure 4 *Argyle and Playfair Streets (Viewpoint 4) – existing SCRA envelope and proposed envelope*

Source: Virtual Ideas

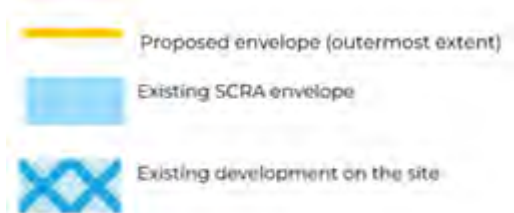


Figure 5 *Glenmore Rooftop (Viewpoint 5) – existing SCRA envelope and proposed envelope*

Source: Virtual Ideas

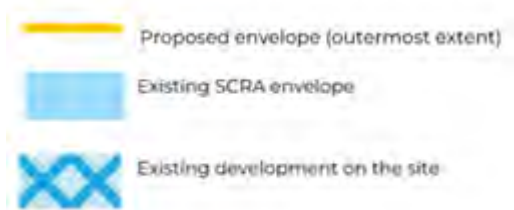


Figure 6 *Argyle Bridge (Viewpoint 6) – existing SCRA envelope and proposed envelope*

Source: Virtual Ideas

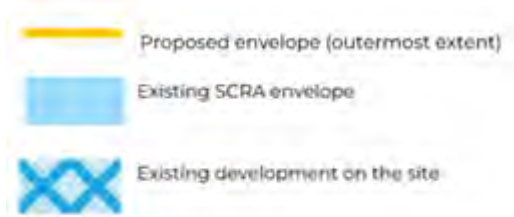
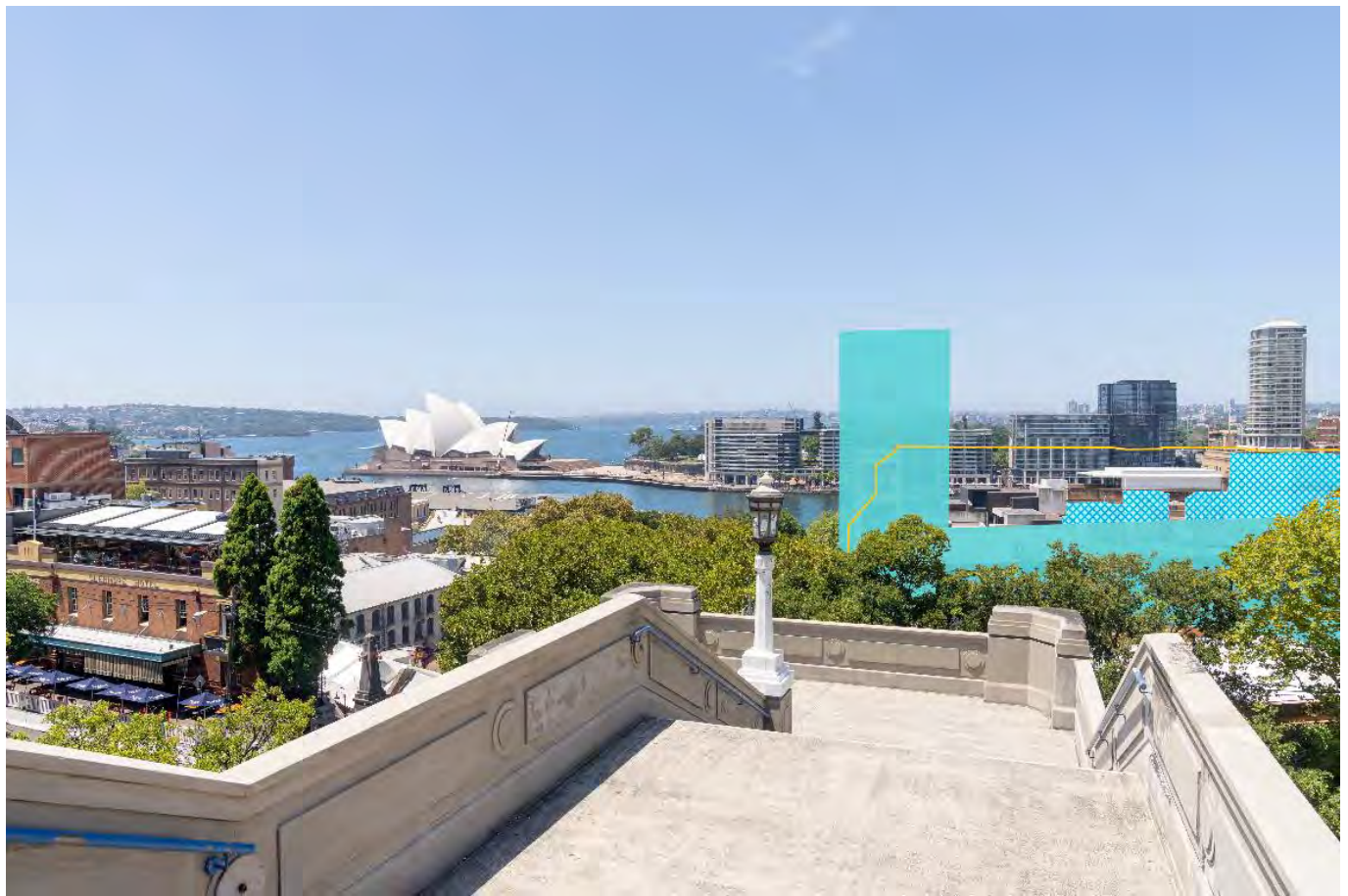


Figure 7 *Bridge Stairs (Viewpoint 7) – existing SCRA envelope and proposed envelope*

Source: Virtual Ideas

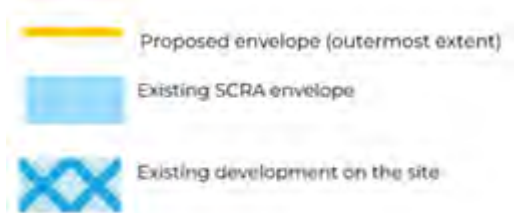


Figure 8 Cahill Walk (north) (Viewpoint 8) – existing SCRA envelope and proposed envelope

Source: Virtual Ideas

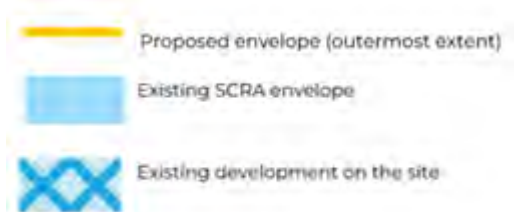


Figure 9 Cahill Walk (south) (Viewpoint 9) – existing SCRA envelope and proposed envelope

Source: Virtual Ideas

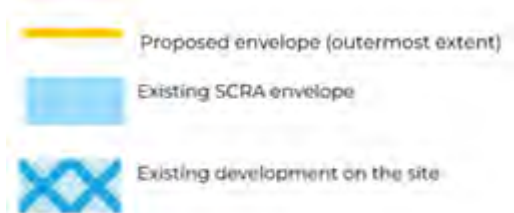


Figure 10 Cambridge Street (Viewpoint 10) – existing SCRA envelope and proposed envelope

Source: Virtual Ideas

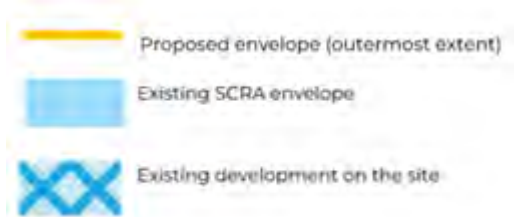


Figure 11 *Harrington Street (Viewpoint 11) – existing SCRA envelope and proposed envelope*

Source: Virtual Ideas

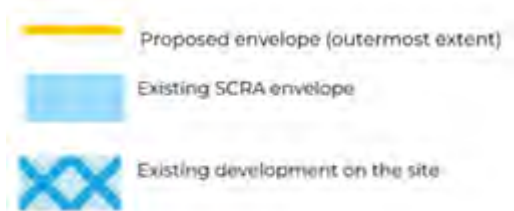


Figure 12 *Argyle & Cambridge Streets (Viewpoint 12) – existing SCRA envelope and proposed envelope*

Source: Virtual Ideas

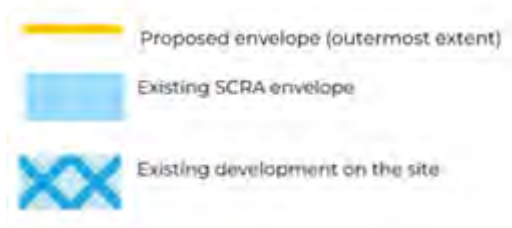


Figure 13 *Observatory Hill (Viewpoint 13) – existing SCRA envelope and proposed envelope*

Source: Virtual Ideas

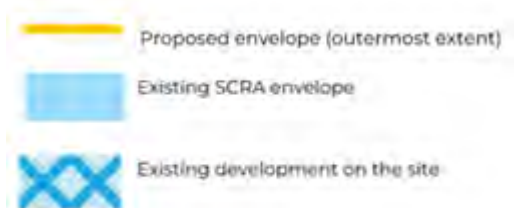


Figure 14 Cahill Walk (west) (Viewpoint 14) – existing SCRA envelope and proposed envelope

Source: Virtual Ideas

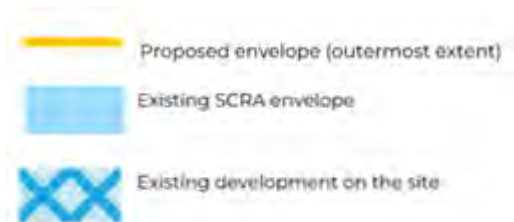


Figure 15 Cahill Walk (east) (Viewpoint 15) – existing SCRA envelope and proposed envelope

Source: Virtual Ideas

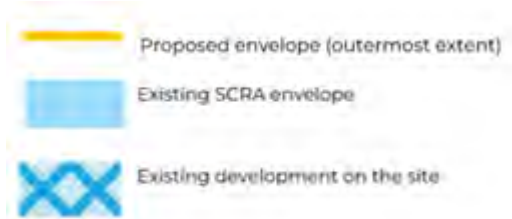
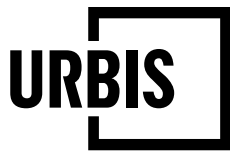


Figure 16 Sydney Opera House forecourt (Viewpoint 16) – existing SCRA envelope and proposed envelope

Source: Virtual Ideas



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5 October 2022

NSW Department of Planning and Environment
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Dear Sir/Madam,

DRAFT SCRA VARIATION REQUEST - HERITAGE SUMMARY REPORT

This brief heritage advice letter has been prepared as a supplementary element to the Draft Sydney Cove Redevelopment Authority (SCRA) Variation Request prepared by Urbis on behalf of Far East Rocks Pty Ltd (FEO). If supported by the Planning Secretary, the Draft SCRA Variation Request will accompany an Environmental Impact Statement that seeks approval for the redevelopment of 35-55 Harrington Street, The Rocks (DPE Reference: SSD-32766230).

Under the SCRA Scheme, the relevant Building Site Control Drawing for 35-55 Harrington Street, The Rocks is Drawing XXXVI. The current and applicable version is XXXVI(1), endorsed by the Minister on 2 June 1986. The SCRA Scheme building envelopes were developed when the original 'Clocktower' building was approved in 1986 (and largely 'shrink-wraps' the building).

The aim of the Draft SCRA Variation request is to formally vary the SCRA Scheme to facilitate the proposed works under SSD-32766230. This advice letter provides a summary analysis of the benefits and appropriateness of the proposed envelope from a heritage perspective in the context of the surrounding significance of The Rocks and the Sydney central business district (CBD).

1. THE SITE

The site is located at 35-55 Harrington Street, The Rocks and is legally described as Lot 1 in Deposited Plan 775889. The land, which has an approximate site area of 2,350sqm, is under the freehold ownership of Place Management NSW (PNSW). A Site Location Map is provided below (Figure 1).

- ▲ EXISTING CAR PARK ACCESS AND EGRESS LOCATIONS
- ▲ EXISTING LOADING DOCK ACCESS (VIA RENDEZVOUS HOTEL)



Figure 1 Site Location Plan
Source: FJMT

2. HERITAGE CONTEXT

The subject site is located within The Rocks Conservation Area, listed on the Sydney Harbour Foreshore Authority (SHFA) Section 170 Heritage and Conservation Register and is managed by Placemaking NSW (formerly Place Management).

The subject site is also in proximity to the following **statutory** heritage listings:

- 55-59 Harrington Street, listed as 'Terraces' on the SHR (Item 01610) and 'Terraces – Stafford Terrace' on the SHFA s170 Register (SHI 4500083)
- 61-65 Harrington Street, listed as 'Terrace' on the SHR (Item 01602) and the SHFA s170 Register (SHI 4500084)
- 67 Harrington Street, listed as 'Terrace' on the SHR (Item 01603) and the SHFA s170 Register (SHI 4500085)
- 71 Harrington Street, listed as 'House' on the SHR (Item 01551) and the SHFA s170 Register (SHI 4500086).

- 26-30 Gloucester Street, listed as 'View Terrace N and W Facades' on the SHR (01614) and SHFA s170 Register (4500067)
- 32-36 Gloucester Street, listed as 'Terrace' on the SHR (01604) and SHFA s170 Register (4500104)
- 38-40 Gloucester Street, listed as 'Terrace' on the SHR (01605) and SHFA s170 Register (4500105)
- 46-56 Gloucester Street, listed as 'Terraces' on the SHR (01609) and SHFA s170 Register (4500068)
- 58-64 Gloucester Street, listed as 'Susannah Place' on the SHR (01310) and the SHFA s170 Register (4500069)
- 39-43 Argyle Street, listed as the 'British Seamen's Hotel (former)' on the SHR (01532) and the SHFA s170 Register (4500002)
- 42-52 Harrington Street, listed as the 'Terraces/Harbour Rocks Hotel' on the SHR (01611) and the SHFA s170 Register (4500082)

In addition, the subject site is in proximity to the following **non-statutory** listings:

- The Rocks Conservation Area, classified on the National Trust Register and the Register of the National Estate
- Harrington Argyle Precinct, listed on the Register of the National Estate
- 55-59 Harrington Street, listed on the National Trust Register and the Register of the National Estate
- 61-65 Harrington Street, listed on the National Trust Register and the Register of the National Estate
- 67 Harrington Street, listed on the National Trust Register
- 71 Harrington Street, listed on the National Trust Register.

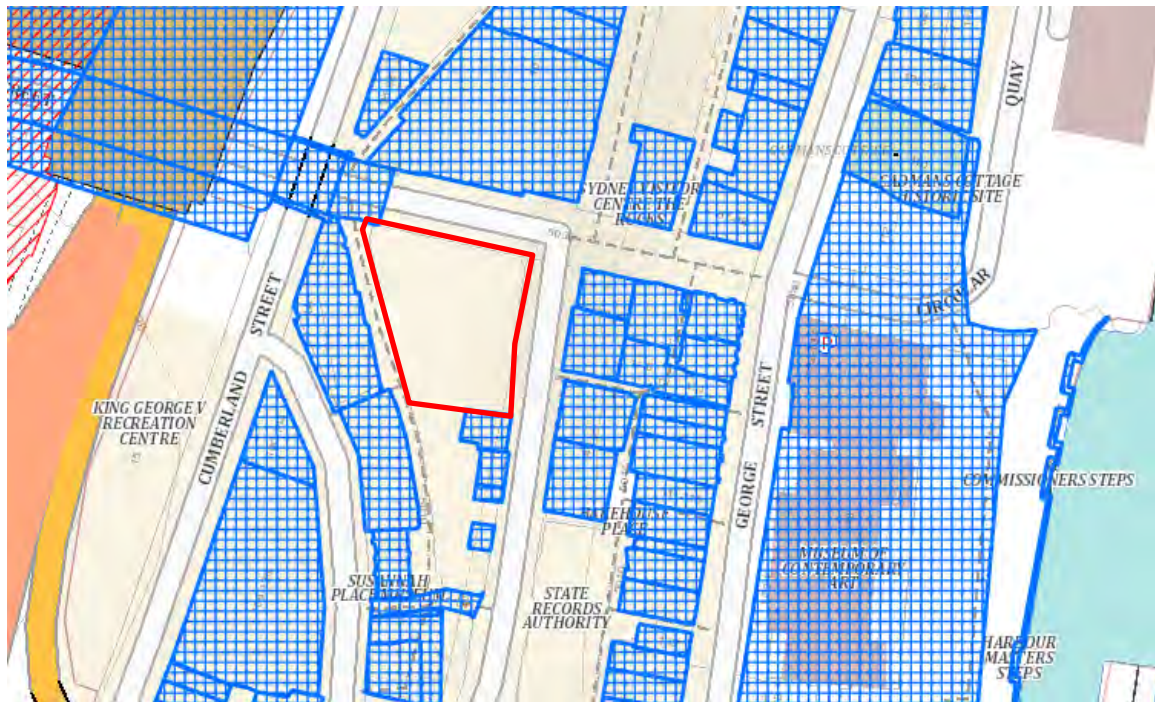


Figure 2 Cadastral map showing the full extent of the subject site and relevant SCRA variation area outlined in red.

Source: NSW eplanning Portal

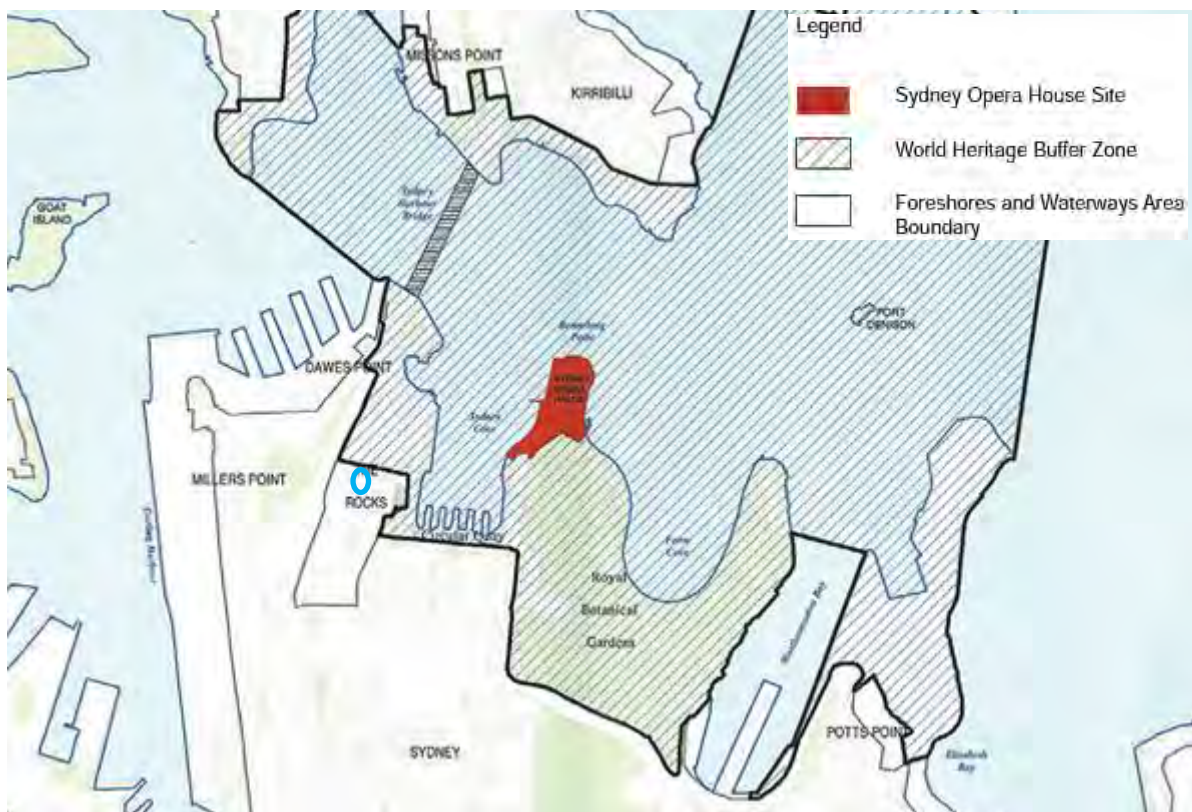


Figure 3 World Heritage Buffer Zone for the Sydney Opera House, the approximate location of the subject site circled in blue.

Source: Sydney Opera House – a Conservation Management Plan, Fourth Addition, prepared by Alan Croker, July 2017

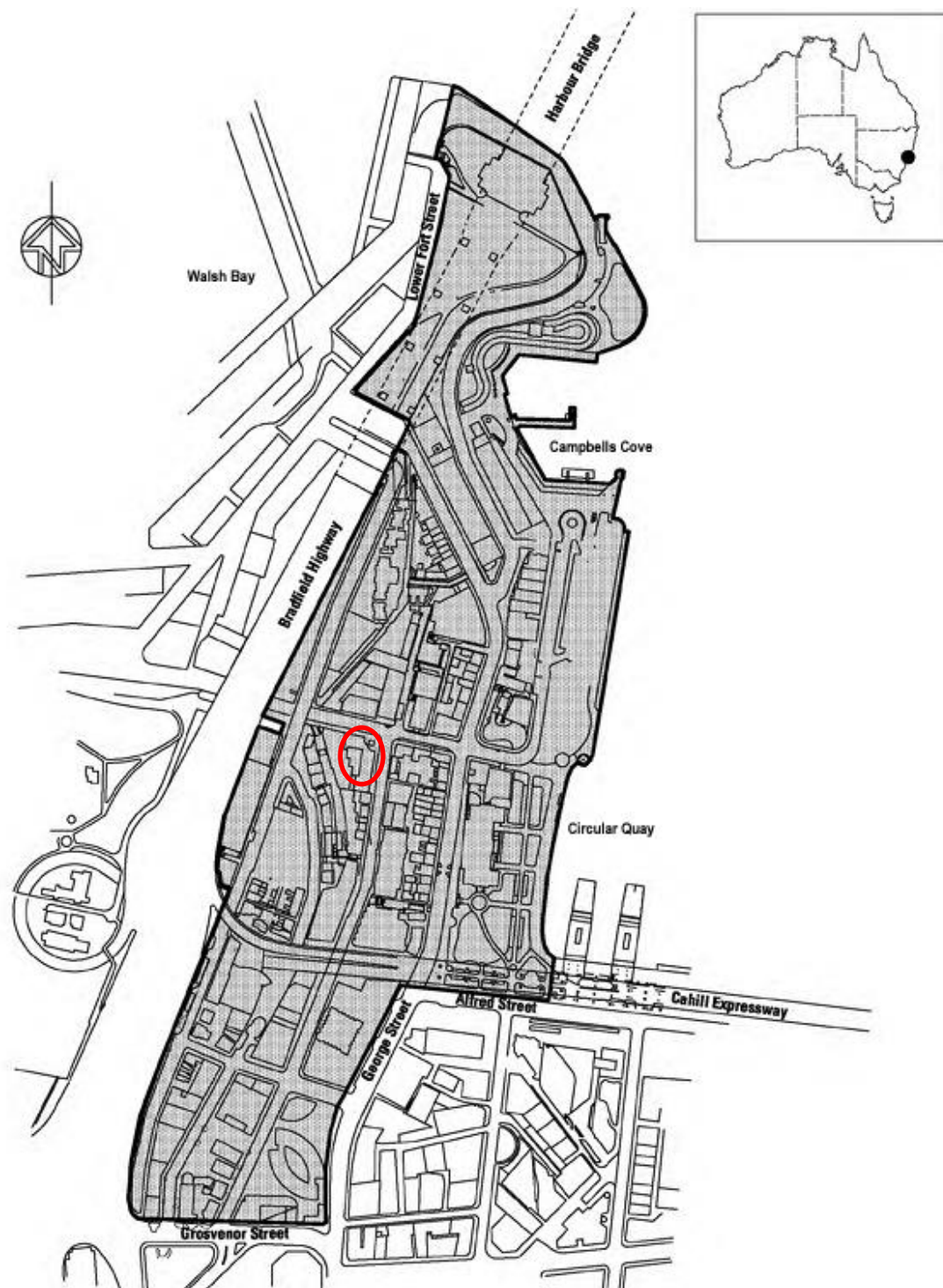


Figure 4 Extract showing the extent of The Rocks Conservation Area with the location of the subject site circled in red.

Source: *The Rocks Heritage Management Plan, April 2010*

Further, it is noted that whilst the subject site is situated outside of the UNESCO World Heritage Buffer Zone for the Sydney Opera House, views to and from the subject site have also been considered for posterity.

3. EXISTING SCRA SCHEME

The relevant SCRA Building Site Control Drawing for the site at 35-75 Harrington Street is Drawing XXXVI. The current and applicable version is Drawing XXXVI(1) endorsed by the Minister on 2 June 1986.

Building Envelope:

- The maximum permitted building height across the bulk of the site is RL35.5 metres with a lower building height at RL27 metres.
- The terraces fronting Harrington Street are noted as being Historic Buildings. Under the SCRA Scheme Historic Buildings are not provided with building envelopes.

The proposed building envelopes were developed when the original building was approved in 1986.

Permissible Uses:

Building Site Control Drawing XXXVI(1) specifies the following requirements in relation to development of this site:

- Permitted uses are 'Commercial', 'Residential' and 'Special'.
 - 'Commercial' deemed to include Business, Office, Retail and food and beverage facilities.
 - 'Residential' under the SCRA Scheme deemed to include Hotels, Motel and Serviced Apartments.

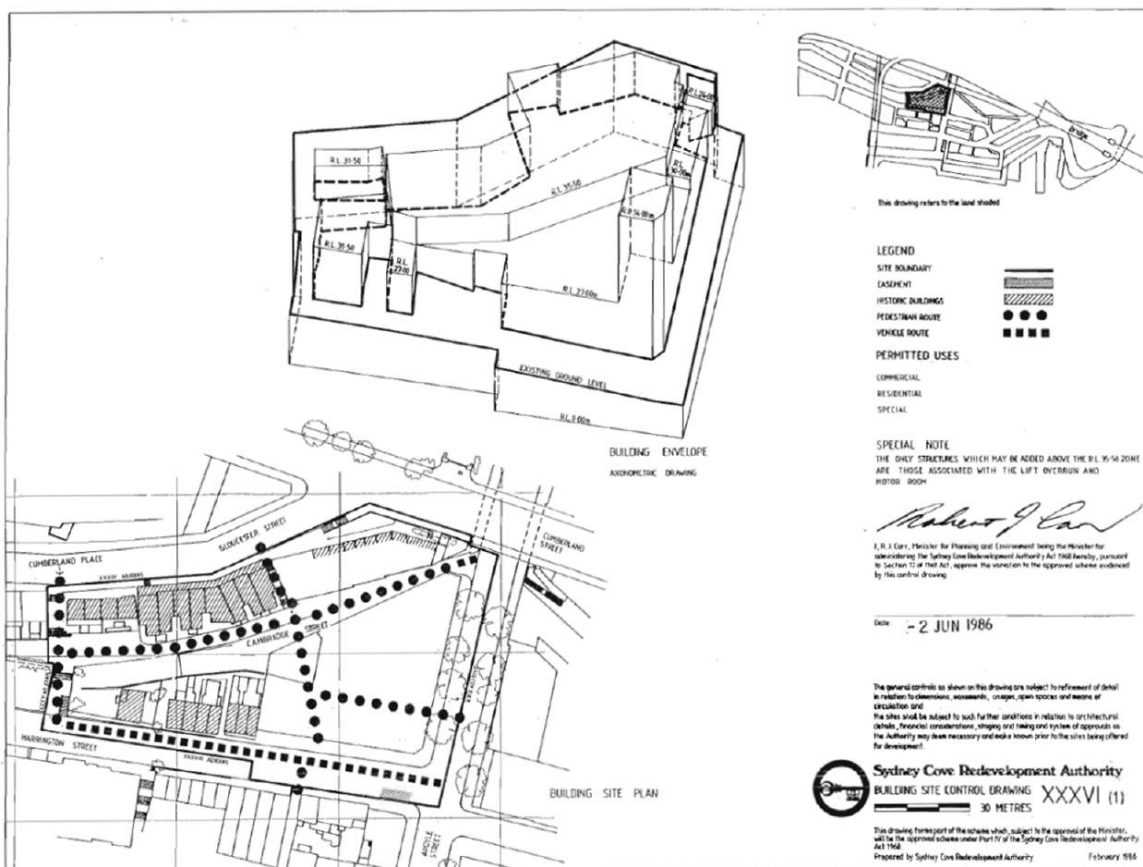


Figure 5 SCRA Site Control Drawing XXXVI(1)
Source: SCRA Scheme

4. PROPOSED VARIATIONS TO THE SCRA SCHEME

As the proposed works do not comply with the SCRA Scheme Building Site Control Drawing, the EP&A Regulations require a formal variation to the plan prior to the approval of the SSDA.

DPE protocols also require the draft variation to be supported by the Planning Secretary prior to the EIS/SSDA being lodged and publicly exhibited.

The current provisions of the SCRA Scheme limit the maximum height of buildings on the site to RL 35.5m with a lower building height at RL 27.0m (fronting Harrington and Argyle Streets). The proposed building has been designed to have the following maximum RLs:

- Top of Quincy Hotel Rooftop – RL 40.9m.
- Quincy Hotel Parapet – 37.9m.
- Harrington Street Podium – RL 23.15m.
- Argyle Street Podium – RL 26m.

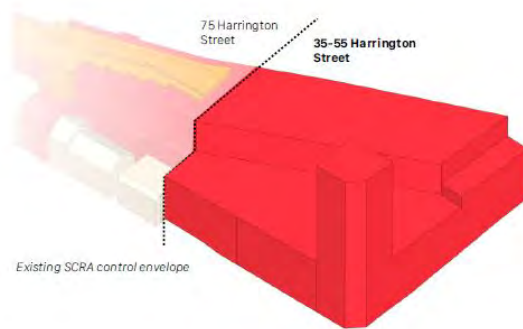


Figure 6 Existing SCRA control envelope

Source: FJMT Studio, October 2022

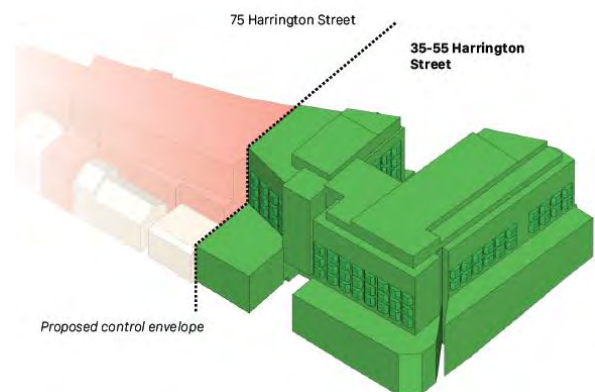


Figure 7 Proposed control envelope

Source: FJMT Studio, October 2022



Figure 8 Overview of the proposed envelope viewed from north-east perspective
Source: FJMT, October 2022

5. HERITAGE COMMENTARY ON PROPOSED SCRA VARIATIONS

The heritage implications of the proposed SCRA variation have been assessed in accordance with the provisions of Clause 9 of the *Environmental Planning and Assessment (Sydney Cove) Savings and Transitional Regulation 1999*. Clause 9(2) states the following:

9 Variation of approved scheme

(1) *The Minister is to consider all submissions concerning a draft variation to the approved scheme made during the period of public exhibition of the draft variation.*

(2) *If, after considering those submissions, the Minister is of the opinion that the draft variation, if made:*

(a) *will not permit development that will adversely affect:*

...(ii) *the heritage significance of buildings, structures or sites in the locality...*

(b) *will not permit development that will have an adverse impact on the natural or built environment or an adverse social or economic impact in the locality, and*

(c) *will conform with the general planning and design principles for the Sydney Cove Redevelopment Area, the Minister may make the variation to the approved scheme in accordance with the draft variation or make the draft variation with such alterations as the Minister thinks fit.*

(3) *The Minister may make a variation to the approved scheme in accordance with this clause, whether or not development consent is granted to the application in relation to which the variation was submitted.*

Analysis of the items of heritage significance within proximity to the subject site and the surrounding The Rocks Conservation Area finds that the variation of the existing SCRA will have a neutral overall

heritage impact. The proposed revised envelope will maintain the following key comparisons relative to the existing building:

Volume

Firstly, from a close proximity, as within Harrington, Argyle or Cambridge Streets, the added height and volume resulting from the proposed SCRA variation and future new development will be of a neutral impact. At ground floor level and within the surrounding streetscape, there will be little to no visibility of the configuration from the upper levels.

In addition, upon viewing from afar, such as from within Circular Quay, the added visual bulk resulting from the increased SCRA, building height and volume will blend in with surrounding development. The clocktower at the north-eastern corner of the existing building is of a significantly greater maximum height than the proposed future development. The proposed new development would in turn provide a more 'spread-out' view of the site from afar that does not 'draw the eye' in the same way, which is more in keeping with the surrounding heritage context.

The impact of the change in volume to the subject site's upper storeys will be neutral from a heritage perspective.

The architects FJMT have followed Urbis' advice that the existing bulk and scale at the street frontage is out of context with the adjacent and surrounding heritage buildings and have moved the bulk from the street frontages to the set back podium form whilst carefully analysing view lines from significant vantage points providing at a pedestrian scale a reduced visual bulk.

GFA

Similarly, to above, the proposed variation to the SCRA and future new development will have a neutral impact on gross floor area. The volume and GFA of the existing clocktower will be repurposed to facilitate better accessible common areas across the breadth of the site including rooftop bar, pool and green spaces.

The reconfiguration of these upper storeys in lieu of the existing clocktower would have no adverse impact on heritage items in proximity to the site, nor would the proposed variation to the SCRA impact on the existing site setbacks and GFA of the lower levels. This is explored in greater detail in the assessment provided by Urbis Planning and the architects.

Overshadowing and Sun Access

Shadow analysis undertaken by FJMT demonstrates that the new dimensions proposed by the future development will have a neutral impact on sun accessibility and shading throughout the course of the day across the year. From a heritage perspective this neutrality is acceptable for the conservation area.

Views

The proposed variation to the SCRA and future new development will have a generally neutral impact on views to the subject site, from both close pedestrian proximity and from afar. There are currently minimal views toward the site from public domain spaces including Circular Quay and the Sydney Opera House.

The architects FJMT have followed Urbis' advice that the existing bulk and scale at the street frontage is out of context with the adjacent and surrounding heritage buildings and have moved the bulk from the street frontages to the set back podium form whilst carefully analysing view lines from significant vantage points providing at a pedestrian scale a reduced visual bulk.

Distant views from the Sydney Opera House and the harbour are improved with a form that is more typical of the rocks in its broken down scale and stepping nature.

Appreciation of The Rocks and views to/from harbour

- The elevation of the proposal provides enhanced and iconic views of the harbour for visitors to the hotel, noting a publicly accessible rooftop bar is proposed on the upper floor of the development. This appreciation of views to the Rocks and the harbour is demonstrated with other properties such as the Glenmore hotel to be highly valued by the public and is positive to be able to provide especially within a new development that can provide amenities and spaces required within the precinct but with no impact to heritage buildings.
- Avoids detrimental visual impacts or view loss due to the careful consideration of bulk and scale outlined above and also demonstrated in the architectural pack and view analysis documentation.

New Public Domain Spaces

New public domain and through sight links are significantly increased with the proposal providing gathering spaces and links that are in keeping with the Rocks heritage characteristics and typologies.

6. CONCLUSION

Overall, it is considered that the variation to the SCRA Scheme will have a generally neutral or positive impact on the heritage significance of the surrounding The Rocks Conservation, it will facilitate the delivery of an appropriate infill building in a manner which respects its context, improves the current contemporary form on the site and minimises its potential impacts on the amenity of the locality.

Should you require any further information or have any additional queries, please do not hesitate to contact the undersigned on the below information

Kind regards,



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