

7
Andy Nixey

From: system@acelo.com on behalf of Graham Quint <gquint@nationaltrust.com.au>
Sent: Friday, 16 September 2016 10:34 AM
To: Andy Nixey
Subject: Submission Details for company Director - Advocacy (org_object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Graham Quint
Organisation: Director - Advocacy (2001)
Govt. Agency: No
Email: gquint@nationaltrust.com.au

Address:
GPO Box 518

Sydney, NSW
2001

Content:
15 September 2016

Department of Planning and Environment
Attn: Director - Key Sites Assessments
GPO Box 39
SYDNEY NSW 2001

Dear Sir/Madam,

Mixed Use Development, 75-85 Harrington Street, The Rocks (SSD 15_7037)

The National Trust lodges a strong objection to this inappropriate and insensitive development proposal within Australia's most historic heritage urban area.

The Trust deplores the poor consultation and total lack of community engagement generally with regard to State Significant Developments. We also note that the nominated project type for this development is 'State Significant Site' but it is not on the list of gazetted State Significant Sites nor is it on the list of proposed State Significant Sites as published on the Major Projects Website.

With regards to consultation and community engagement the Trust notes the Secretary's Environmental Assessment Requirements regarding Consultation -

"During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners. In particular, you must consult with:

- * City of Sydney Council.
- * Sydney Harbour Foreshore Authority
- * EPA.
- * Office of Heritage and Environment.
- * Sydney Water.
- * Transport for NSW.
- * Roads and Maritime Services.
- * Sydney Trains.
- * Local Aboriginal Land Council and stakeholders, if relevant.
- * Local heritage groups, if relevant.

The EIS must describe the consultation process and the issues raised, and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided." (National Trust bolding)

The National Trust has been based in The Rocks/Millers Point for the past forty years and was the body to first investigate and assess the heritage significance and list on the National Trust Register "The Rocks Conservation Area" in 1978 and 101 individual buildings, spaces and items in this area, most in the period 1973 - 1978.

The Urbis staff indicated as responsible for the preparation of the Heritage Impact Statement should have been well aware of the work and involvement of the National Trust in The Rocks.

"The Rocks" is clearly of State Heritage Significance irrespective of its current statutory listing status.

The National Trust is not aware of any contact from Urbis or the project's proponents or other consultants and certainly no consultation or engagement on this issue, in direct contradiction of the Secretary's Environmental Assessment Requirements regarding Consultation.

Given the failings of the system set out above, this is the first opportunity for the National Trust to put its views on the disturbing and unprecedented development proposal.

The application for a variation to the Sydney Cove Redevelopment Authority Scheme is being made by Urbis. However, Urbis is also the author of the Heritage Impact Statement, and could not seriously be expected to raise concerns or flag adverse impacts which may put the application in jeopardy. There clearly needs to be an independent Heritage Impact Statement to avoid this obvious conflict of interest.

The variation proposal seeks an increase in height from RL 41.0 to RL 49.97, an increase of 9 metres.

The Heritage Impact Statement recognises that the proposal will be a large scale development in Gloucester Street, but fails to acknowledge that the principle of the height controls in the southern zone was to keep heights low north of the Cahill Expressway. This proposal creates a very concerning precedent for building heights north of the Cahill Expressway.

An examination of the elevations of the proposed building show that it is completely out of scale for the area and completely out of context. The variation recognizes that the proposal has "very large east and west elevations."

The variation seeks to claim that the existing built form relates poorly to its surrounding context. However, in the National Trust's view, the existing built form blends remarkably well with the scale and form of The Rocks.

The National Trust strongly disagrees with the claim that the proposal "blends seamlessly with the streetscape" and is a "good contextual fit." It does not and is not.

The variation attempts to claim public benefits when in fact there are no public benefits. The suggested public benefit of opening the existing through site link to the sky will result in the exposure of the huge discrepancy in scale between the existing Gloucester Street terraces and the proposed 10 storey building.

In fact the Heritage Impact Statement makes only passing reference to the proposed new buildings and mostly focuses on the Gloucester Street Terraces. The Statement tries to ignore the "elephant in the room".

This application proposes the demolition of a very recent building, a building carefully designed to fit into the Rocks Urban Conservation area. This was a very early Conservation Area and the development proposal flaunts many years of careful planning and previous considerations regarding scale and impact of developments.

The developer is seeking a larger envelope in direct contradiction of the SCRA Scheme's intention for low scale north of the Cahill Expressway. This was the original trade off for development in The Rocks - so that the character of the townscape could be retained.

Two of the oldest surviving blocks of housing in Sydney are in close proximity - Susannah Place (1844) and the Jobbins Building (1850s). The Jobbins building used to have harbour views which have since been blocked. Views to the existing building down Longs Lane etc were all carefully considered in the SCRA scheme.

The developer has commissioned both the Conservation Management Plan and the Statement of Heritage Impact. The Trust would expect that the Sydney Harbour Foreshore Authority should have been extensively consulted in the preparation of these documents.

The existing building at 75-85 Harrington Street is of such recent construction that it could not possibly need replacing. The Trust questions whether the development proponents are aware of the concept of sustainable retrofitting.

The National Trust objects in the strongest possible terms to this development proposal.

Yours sincerely

Graham Quint
Director - Advocacy
The National Trust of Australia (NSW)

IP Address: eth59-167-134-201.static.internode.on.net - 59.167.134.201
Submission: Online Submission from company Director - Advocacy (org_object)
https://majorprojects.affinitylive.com/?action=view_activity&id=162851

Andy Nixey

From: system@acelo.com on behalf of Marcia Chalmers <mprag@bigpond.com>
Sent: Tuesday, 13 September 2016 12:23 PM
To: Andy Nixey
Subject: Submission Details for company Millers Point Resident Action Group (org_object)
Attachments: 85 Harrington Street, The Rocks objection.pdf

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Marcia Chalmers
 Organisation: Millers Point Resident Action Group (Secretary)
 Govt. Agency: No
 Email: mprag@bigpond.com

Address:
 5 Windmill Street

Millers Point, NSW
 2000

Content:

The proposed development's size and scale dwarfs the heritage-listed terraces along Gloucester Street including the much visited Susannah's Place Museum and Shop.

It is important to note The Rocks is Australia's pre-eminent heritage-listed precinct where conserving the historical integrity of the existing streetscape is crucial. The 9/10 storey buildings proposed on both Harrington Street and Gloucester streets are not in keeping with the surrounding streetscape's height and scale and look totally out of character.

These building's height should be reduced to a 6 storey MAXIMUM so they do not dominate the streetscape and surrounding heritage terraces.

The development's height must be reduced so it falls within the approved height limits of the area. These height limits have been set to protect the character and existing streetscape of The Rocks.

The height limits have been set as maximum building height which may be achieved by any proposed development, not as a starting point.

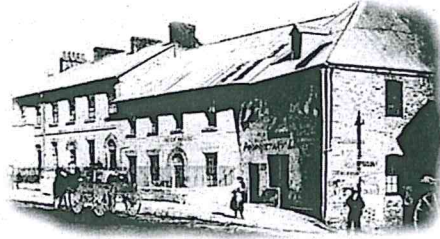
IP Address: - 115.187.246.174

Submission: Online Submission from company Millers Point Resident Action Group (org_object)
https://majorprojects.affinitylive.com/?action=view_activity&id=162516

Submission for Job: #7037 Mixed Use Development, 75-85 Harrington Street, The Rocks
https://majorprojects.affinitylive.com/?action=view_job&id=7037

Site: #3096 75-85 Harrington Street
https://majorprojects.affinitylive.com/?action=view_site&id=3096

Millers Point, Dawes Point, The Rocks and Walsh Bay Resident Action Group



5 Windmill Street
MILLERS POINT
NSW 2000
mprag@bigpond.com

13 September 2016

Department of Planning and Environment
Attn: Director – Key Sites Assessments
GPO Box 39
Sydney NSW 2001

RE: 85 Harrington Street and 68-72 Gloucester Street, The Rocks

The proposed development's size and scale dwarfs the heritage-listed terraces along Gloucester Street including the much visited Susannah's Place Museum and Shop.

It is important to note The Rocks is Australia's pre-eminent heritage-listed precinct where conserving the historical integrity of the existing streetscape is crucial. The 9/10 storey buildings proposed on both Harrington Street and Gloucester streets are not in keeping with the surrounding streetscape's height and scale and look totally out of character.

These building's height should be reduced to a 6 storey MAXIMUM so they do not dominate the streetscape and surrounding heritage terraces.

The development's height must be reduced so it falls within the approved height limits of the area. These height limits have been set to protect the character and existing streetscape of The Rocks.

The height limits have been set as maximum building height which may be achieved by any proposed development, not as a starting point.

Kind Regards,

John McInerney

Chair

Millers Point, Dawes Point, The Rocks and Walsh Bay Resident Action Group

Andy Nixey

From: system@acelo.com on behalf of Adam Newband <adam.newband@yha.com.au>
Sent: Tuesday, 13 September 2016 11:01 AM
To: Andy Nixey
Subject: Submission Details for company YHA (org_object)
Attachments: YHA Submission_ 75 Harrington Street, The Rocks_ Redevelopment V2.pdf

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Adam Newband
Organisation: YHA (Development Manager)
Govt. Agency: No
Email: adam.newband@yha.com.au

Address:
Level 3 / 9 Castlereagh Street

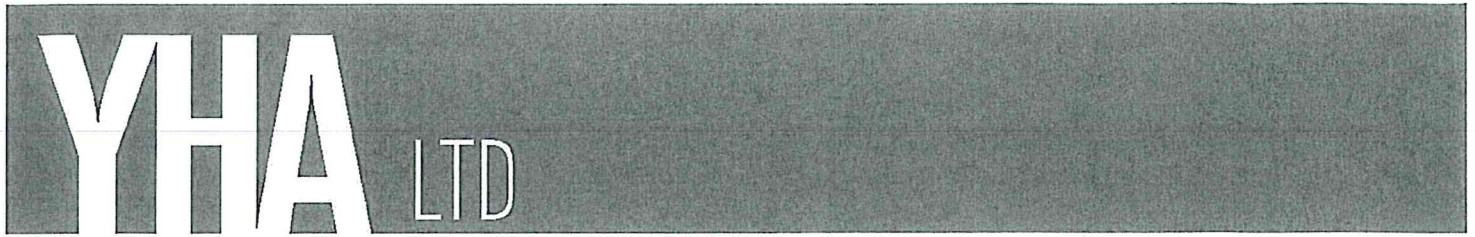
Sydney, NSW
2001

Content:
Please see attached Version 2, which supersedes version 1 dated 5 September 2016.

IP Address: - 125.7.41.160
Submission: Online Submission from company YHA (org_object)
https://majorprojects.affinitylive.com/?action=view_activity&id=162502

Submission for Job: #7037 Mixed Use Development, 75-85 Harrington Street, The Rocks
https://majorprojects.affinitylive.com/?action=view_job&id=7037

Site: #3096 75-85 Harrington Street
https://majorprojects.affinitylive.com/?action=view_site&id=3096



To provide opportunity for all, but especially young people, for education by personal development, fostering friendship and bringing about a better understanding of others and the world around them.

13 September 2016

NSW Government
Planning and Environment Directorate
Customer Service Centre
GPO Box 39
SYDNEY NSW 2001

Dear Madam / Sir

RE: Development Application SSD 15_7037 & 75-85 Harrington Street, Sydney

I refer to the abovementioned Development Application and our previous submission dated 5th September 2016. We would like to withdraw that submission and make this new submission regarding the proposed development

YHA has operated a youth hostel from the property at 110 Cumberland Street, The Rocks for approximately 7 years and writes to note its objection to the development of the abovementioned site for purposes of a 6 storey and 9/10 storey mixed use building for apartments, commercial office space and retail floor area.

YHA acknowledges that the new development will improve site access via the introduction of an improved broad set of stairs extending from Globe Street to Gloucester Street allowing more direct way finding from this part of The Rocks to Circular Quay. The new courtyard around the Bakers Terraces activated by retail tenancies and a public access lift is also commended, although ideally the later should be extended to Gloucester Street to provide accessible access to the upper part of The Rocks (Gloucester and Cumberland Street).

Whilst acknowledging these improvements, YHA objects to the proposed development on the following grounds.

Building Height

YHA object to the development exceeding the Sydney Cove Redevelopment Authority (SCRA) Scheme height by 8.97m on the southern end of the site and 2.3m on the northern end of the site. YHA believes that the extra height will result in built form that is overly bulky and will dominate the existing topography and streetscapes that it fronts onto.

The new building will be out of character with the scale and height of the existing buildings on Harrington and Gloucester Streets.

YHA strongly believes that the proponent of the development should be requested to redesign their building to comply with Scheme height limits, as we were when designing and constructing Sydney Harbour YHA.



Character of The Rocks

YHA notes that The Rocks currently provides for a diverse mix of accommodation, entertainment, recreational, residential, hospitality, commercial and tourists land uses resulting in a vibrant precinct for tourists and backpackers alike to explore and experience a unique part of Sydney's heritage.

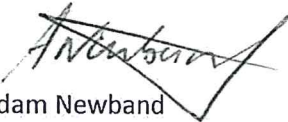
The introduction of more apartments has the possibility to alter the existing fabric and vibrancy of the area i.e. via new residents wanting restrictions on hours of operation of premises etc. and to this end YHA remains opposed to any new land uses that do not support and encourage the longevity of the vibrancy of The Rocks as an accommodation, entertainment and tourism precinct.

State Heritage Listings

The proposal fails to recognise a significant area on the State Heritage Register, the Cumberland Street Archaeology Area (SHR No.1845), which is directly opposite the proposed development. YHA, in conjunction with SHFA, is responsible for managing this State Heritage listed archaeology area. The proposed development and associated excavation has the potential to create changes in the bedrock of the area which may result in movement and damage to the archaeology.

Please contact the undersigned should you want to discuss further.

Yours faithfully,



Adam Newband
Development Manager

13/9/2016



Andy Nixey

From: system@acelo.com on behalf of Evelyne Bonnet <yasmina@ybconsulting.com.au>
Sent: Monday, 12 September 2016 10:26 PM
To: Andy Nixey
Subject: Submission Details for Evelyne Bonnet (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Evelyne Bonnet
 Email: yasmina@ybconsulting.com.au

Address:
 58 Argyle Place

Millers Point, NSW
 2000

Content:
 The proposed development's size and scale dwarfs the heritage-listed terraces along Gloucester Street including the much visited Susannah's Place Museum and Shop.

It is important to note The Rocks is Australia's pre-eminent heritage-listed precinct where keeping the historical integrity of the streetscape is crucial. The 9/10 storey buildings proposed on both Harrington Street and Gloucester streets are not in keeping with the surrounding streetscape's height and scale and look totally out of character.

These buildings's height should be reduced to a 6 storey minimum so they do not dominate the historic streetscape and surrounding heritage terraces.

The development's height must be reduced so it falls within the agreed height limits of the area. These height limits have been set to protect the character and existing streetscape of The Rocks, one of the only heritage listed precincts of Australia.

The height limits have been set as maximum building height which may be achieved by any proposed development, not as a starting point.

IP Address: - 115.187.246.174
 Submission: Online Submission from Evelyne Bonnet (object)
https://majorprojects.affinitylive.com/?action=view_activity&id=162484

Submission for Job: #7037 Mixed Use Development, 75-85 Harrington Street, The Rocks
https://majorprojects.affinitylive.com/?action=view_job&id=7037

Site: #3096 75-85 Harrington Street
https://majorprojects.affinitylive.com/?action=view_site&id=3096

Andy Nixey

From: system@acelo.com on behalf of Francis Chu <chu_francis@hotmail.com>
Sent: Wednesday, 14 September 2016 6:00 PM
To: Andy Nixey
Subject: Submission Details for Francis Chu (support)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Francis Chu
Email: chu_francis@hotmail.com

Address:
25B

The Rocks, NSW
2000

Content:
85 HARRINGTON STREET, THE ROCKS (SSD7037) - LETTER OF SUPPORT

Thank you for the opportunity to provide comments on the abovementioned development application.

I am the owner of 25B 171 Gloucester street, The Rocks. I wanted to provide my full support for this application for the following key reasons:

- * The proposal will enhance the local area by providing new pedestrian linkages and public domain improvements.
- * A range of new job opportunities are provided in the retail and commercial elements of the project
- * The design of the residential apartments are of a very high design quality by a very highly reputable Sydney architect
- * The development is in keeping with the significant heritage setting of The Rocks and the local area.

Based on the above, I recommend that the NSW Department of Planning & Environment approve the application.

IP Address: - 101.164.160.236

Submission: Online Submission from Francis Chu (support)
https://majorprojects.affinitylive.com/?action=view_activity&id=162665

Submission for Job: #7037 Mixed Use Development, 75-85 Harrington Street, The Rocks
https://majorprojects.affinitylive.com/?action=view_job&id=7037

Site: #3096 75-85 Harrington Street
https://majorprojects.affinitylive.com/?action=view_site&id=3096

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New South Wales Government
Department of Planning
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(Name withheld) , of Redfern NSW, made the following submission on the project:

Mixed Use Development, 75-85 Harrington Street, The Rocks



Comments on this project

On the highly prominent location in the city, it would be highly desirable to build an iconic building Sydney will cherish. A building that is unique and will complete the streets and embrace historic fabric of the Rocks precinct. This includes any new residential apartment in this area. The current proposal is just like another apartment I've seen before somewhere.

New South Wales Government
Department of Planning
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(Name withheld) , of Holsworthy NSW, made the following submission on the project:

Mixed Use Development, 75-85 Harrington Street, The Rocks



Objects to this project

I object to the proposed height increase of the new building.
The new building should be at the same height as the current building that stands.

New South Wales Government
 Department of Planning
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(Name withheld) , of Sydney NSW, made the following submission on the project:

Mixed Use Development, 75-85 Harrington Street, The Rocks



Supports this project

16th September 2016

Mr Andy Nixey
 Specialist Planner
 Key Sites Assessments
 NSW Planning & Environment
 GPO Box 39
 SYDNEY NSW 2001

Reference: 85 HARRINGTON STREET, THE ROCKS (SSD7037) - LETTER OF SUPPORT

Dear Mr Nixey,

I am the owner of an apartment at _____, Sydney and have recently examined the plans of the development and know the site well. I wish to offer my support to the proposal, for the reasons outlined below.

- The proposal will enhance the local area by providing new pedestrian linkages and public domain improvements, demonstrating a thorough and well thought through design process
 - Whilst innovation and forward thinking is clearly evident, respect for the heritage setting of the area is maintained. Design of the development will not in my view compromise the existing character of Harrington Street and the broader The Rocks area, and will in fact visually beautify the immediate street frontages as a result of replacing the less than complimentary design of the current building
 - The high end design of the apartments themselves by a respected Sydney architect is complementary to neighboring properties
- Creation of local job opportunities as a result of again, a well thought through combination of retail and commercial elements, that also allows synergies with the residential element

- I thank you for the opportunity to provide my comments and firmly believe the development will overall be a welcome addition to the area. With that in mind, it is my recommendation that the NSW Department of Planning & Environment approve

the application.

Kind Regards

New South Wales Government
Department of Planning
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(Name withheld) , of THE ROCKS NSW, made the following submission on the project:

Mixed Use Development, 75-85 Harrington Street, The Rocks



Objects to this project

Whilst I do not object to the existing buildings being demolished and/ or refurbished... I do object to the suggestion that they will be replaced by a higher building.

Please preserve the " height " of the existing buildings and not allow these new buildings to be any higher than the ones that are being replaced.

This is a sensitive area and the "ambience" will be destroyed if the existing height restriction is allowed to be increased.

Andy Nixey

From: system@acelo.com on behalf of Michael Gaston
<michael.gaston@kannfinch.com>
Sent: Friday, 16 September 2016 3:01 PM
To: Andy Nixey
Subject: Submission Details for Michael Gaston of kannfinch (support)
Attachments: 16.09.16_SSD 15 7037.pdf

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Michael Gaston
Organisation: kannfinch (2000)
Email: michael.gaston@kannfinch.com

Address:
Level 9, 50 Carrington Street

SYDNEY, NSW
2000

Content:
Confirmed

IP Address: - 180.214.90.34
Submission: Online Submission from Michael Gaston of kannfinch (support)
https://majorprojects.affinitylive.com/?action=view_activity&id=162987

Submission for Job: #7037 Mixed Use Development, 75-85 Harrington Street, The Rocks
https://majorprojects.affinitylive.com/?action=view_job&id=7037

Site: #3096 75-85 Harrington Street
https://majorprojects.affinitylive.com/?action=view_site&id=3096

12 September 2016

Mr Andy Nixey
Specialist Planner
Key Sites Assessments
NSW Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Andy,

RE: 85 HARRINGTON STREET, THE ROCKS - DA LETTER OF SUPPORT
REFERENCE: (SSD7037)

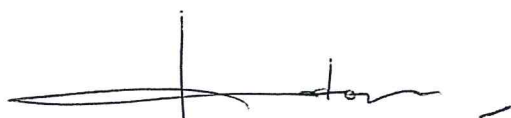
I welcome the opportunity to provide comments on the abovementioned development application.

I am the owners of Unit 31, 161 Kent Street, Sydney and wish to provide support for application number SSD 15_7037. I am a local resident, and support the application for the following reasons.

- The design of the residential apartments are of a high level of design quality.
- Improved local amenity through the provision of new pedestrian linkages and public domain improvements.
- The development respects the significant heritage setting of The Rocks.
- New commercial job opportunities will emerge keeping the area vibrant and safe.

I support the above application and suggest that the NSW Department of Planning & Environment approve the application.

Yours sincerely,



Michael Gaston

Andy Nixey

From: system@acelo.com on behalf of Noni Boyd <noni.kay.boyd@gmail.com>
Sent: Friday, 16 September 2016 1:11 PM
To: Andy Nixey
Subject: Submission Details for Noni Boyd of Noni K Boyd Architectural Historian (object)
Attachments: 75_85 Harrington BOYD.pdf

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Noni Boyd
 Organisation: Noni K Boyd Architectural Historian (principal)
 Email: noni.kay.boyd@gmail.com

Address:
 GPO Box 1334

SYDNEY, NSW
 2000

Content:

The proposal to demolish a 1980s building that was carefully designed to fit into the streetscape , in the vicinity of two important state heritage listed items - The Jobbins Terrace and Susannah Place, and the proposed replacement of the building with a larger building is contrary to the overalls aims for The Rocks Conservation Area. New buildings within the historic area to the north of the Cahill Expressway have set building envelopes designed to complement the nineteenth century townscape. This proposal seeks a larger envelope but does not demonstrate that it contributes to the long term conservation of the historic area. Adapting the current building for a new use would be a more sustainable solution.

IP Address: rds.architecture.com.au - 203.31.255.38

Submission: Online Submission from Noni Boyd of Noni K Boyd Architectural Historian (object)
https://majorprojects.affinitylive.com/?action=view_activity&id=162905

Submission for Job: #7037 Mixed Use Development, 75-85 Harrington Street, The Rocks
https://majorprojects.affinitylive.com/?action=view_job&id=7037

Site: #3096 75-85 Harrington Street
https://majorprojects.affinitylive.com/?action=view_site&id=3096

Dr Noni K. Boyd
Architectural Historian
GPO Box 1334
Sydney 2001
Australia
Mobile: 0412 737 921
ABN 71 376 540 977

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

By online submission
16 September 2016
Attention: Andy Nixey

Dear Sir,

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

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

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

.../2

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

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

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

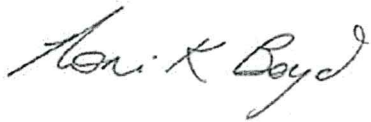
The analysis undertaken in the CMP prepared for the proponent is a general one for housing stock of this age, and does not demonstrate a particular understanding of this building group. Detailed archival material held by SHFA was largely not utilized; the majority of the information was simply drawn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

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

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

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

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

A handwritten signature in cursive script that reads "Noni K Boyd". The signature is written in dark ink and is positioned above the printed name and qualifications.

Dr Noni Boyd
B Arch, MSc (Arch. Cons), PhD
Architectural Historian