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The Secretary
NSW Department of Planning and Environment
GPO BOX 39
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Date: 17/06/2016

Re: Supplementary Submission to the State Significant Development Application and Variation of the Sydney Cove Redevelopment Scheme for the 'Remediation, Renewal and Adaptive Re-Use of Campbell's Store', The Rocks (SSD 7056).

GM Urban Design & Architecture (GMU) has been engaged by the owners of 8 Hickson Road, The Rocks to review the proponent's response to submissions regarding the State Significant Development Application for Campbell's Stores, The Rocks. The purpose of this supplementary submission is to assess whether the amendments have addressed the main issues/concerns raised during the exhibition period in relation to the proposed extension of Campbell's Stores, referred to as 'Bay 12', which is under the ownership of the Sydney Harbour Foreshore Authority (SHFA).

To undertake this assessment, GMU has reviewed the Response to Submissions prepared by Urbis and a number of associated appendices including City of Sydney's (CoS) land owner's consent, design response report, revised architectural drawings, material boards, Sydney Cove Redevelopment Authority (SCRA) diagram, heritage response, visual impact assessment, noise impact assessment, wind response, and preliminary plan of management.

It is noted that the revised proposal specifies the use of the Bay 12 building to be a high-end retail only with typical operational hours similar to those of other retail uses throughout the area, and that there will be no proposed food and beverage use on the site. This is to mitigate any potential noise impact and light spill to the residents living at 8 Hickson Road.

According to the architect's (JPW) Design Response – Section 6.5-6.6 (page 24-26), the revised design proposes a minor reduction in the overall height (400mm to the façade and 600mm to the roof and lift overrun) and incorporates 'warm' contemporary materials and colours such as glass block with specially painted edges in 'warm' tones and exposed concrete soffits with *warm coloured aggregates* with the intention to blend Bay 12 building into the heritage context. However, it is GMU's opinion that the proposed modifications do not significantly change the overall massing and essence of the design which will significantly depart from the historic urban fabric. The proposed 'glass box' lifted on stilts with no fenestrations and vertical architectural elements introduces a new fabric and architectural expression into this heritage area. It presents a deliberate contemporary building expression that has a non-symbiotic relationship with the heritage context and historic character of the surrounding buildings.

The visual analysis presented in the response to submissions suggests that there would be no view impacts on the residents at 8 Hickson Road; however, the proposed Bay 12 building silhouetted in white rendering shows that the proposed built form does not sensitively respond to the significant historic setting in Campbell's Cove and the existing foreshore alignment. Taking the proposed façade design and materials into consideration, it appears to be a solid cubic form filling in the open space gap when viewed opposite from Hickson Road. Therefore, the perceived bulk and scale of the proposed Bay 12 building appears to be greater than the Campbell's Stores and visually apparent from numerous viewpoints according to the visual impact assessment.

The applicant's Response to Submissions also states that the proposed undercroft provides opportunity for increased public accessibility and connection from Hickson Road to the foreshore area with open vistas to the

water and Opera House. The Response to Submissions by Urbis (page 30) states that the space “will be activated by a coffee and/or ice cream cart” to invite a broad cross-section of the public. However, from an urban design point of view, the proposed undercroft space with a height of 2.5m does not provide sufficient space to enable open views and to encourage public access. On the contrary, the low ceiling undercroft area on the ground level deactivates the public domain and does not have sufficient height to become an attractive open space or an effective view corridor, which is an undesired outcome.

The Bay 12 building with a vertical core stack for circulation along the northern boundary is 10m south of the Park Hyatt Hotel. It creates a physically defined edge which obstructs visibility to the publicly accessible foreshore area and limits spatial connection to the waterfront. This is contrary to the design concept of *‘creating an uninterrupted public access from Hickson Road to Campbell’s Cove through the subject site’*. The existing separation distance of approximately 26m, as measured from SIX map, reduces to approximately 10m at the eastern end of the opening to the Park Hyatt Hotel, according to JPW’s Design Response- Executive Summary Diagram (page 5). This is representative of a 62% reduction in separation distance which will increase the ‘sense of enclosure’, density and scale and irreversibly alter the rhythm of open space to built form for this section of the precinct. The existing separation distance between Bay 1 and ANSC building is approximately 21m, 90% more than the proposed opening at the other end, which will be reduced to approximately 10m. Therefore, the openings to either side of the existing bays will be unequal and unbalanced. The raised ground level of Bay 12 building will also affect the north façade of Bay 11 where it abuts the existing windows and doors.

Historically, the land area of the proposed Bay 12 formed part of the open space of Sydney’s foreshore. The intrusive 1-storey pavilion erected in the 1990s on the site was intended to be a temporary structure. According to the SCRA Scheme – Building Site Control drawing XVII, the Bay 12 site is restricted to a height of 0.5-3m. It is GMU’s understanding that the intention is to maintain a public view corridor from Hickson Road to Campbell’s Cove and between Campbell’s Stores and other development, whilst reinforcing its heritage significance and the historic settings of the area. The Campbell’s Stores Conservation Management Plan (CMP) recommends the removal or replacement of the pavilion with a more sympathetic structure that is well-designed and *‘consistent with the existing rhythm’* of the bays and *‘could maintain and enhance the distinctive identity of Campbell’s Stores’*. The CMP also mentions the use of appropriate materials, with the existing materials and colours as a point of reference.

According to the assessment, the revised Bay 12 building still exceeds the height restriction to an RL level of 17.4m including lift overrun. Its proposed glass block facades and cubic form presents a new urban fabric and built form that does not sensitively respond to the prominent character of the heritage buildings. This infill development in a contemporary bulky form with a narrow separation distance of 4m to the Campbell’s Stores will detract from the pristine nature of the remarkable heritage buildings. The proposed height and density will also physically increase the enclosure of public open space between the Campbell’s Stores and the Park Hyatt Hotel. The proposed undercroft area with a height of only 2.5m will not successfully form an inviting open space for the use of general public.

GMU’s review of the Response to Submissions and other relevant materials points out the lack of meaningful changes to the original design. The revised design does not add value to the significant historic character of Campbell’s Cove area. It is not considered to be a well-designed addition that is consistent with the existing rhythm of Campbell’s Cove and contributes to the prominent heritage setting. In the principle of preserving and enhancing the intergenerational value of Campbell’s Cove and Campbell’s Stores, GMU strongly recommends that the proposal be amended to exclude the proposed ‘glass box’ Bay 12 building.