

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

This initial objection is to **PROCESS** on the following grounds:

- The Sydney Harbour Foreshore Authority (SHFA) should not have been able to provide landowner's consent to any State Significant Development once the Government had decided to transfer SHFA's powers to other entities.
 - There should be no decisions made about development of Campbell's Cove until after Premier Baird's proposed review of control and ownership of government-owned lands around Sydney Harbour announced on 28 September 2015: *'the Government is currently examining the most appropriate land use planning, heritage, and management framework for The Rocks precinct in consultation with the Commonwealth Government'*.
 - I also understand that the new Greater Sydney Commission will have oversight of the entire harbour foreshore. Given both these developments, Tallawoladah's proposals are premature and should be incorporated into a holistic review process. This requested delay is particularly important given the heritage significance of the Campbell's Stores building itself.
 - A SSD should not be able to be exhibited until all landowners have provided consent to the leaseholder's proposals. The City of Sydney has yet to provide landowner's consent and it isn't clear whether or not the Police Association is also a landowner which has to grant its consent. Equally, it's unclear just who exactly among various (government or perhaps other) entities do constitute the landowners. This is something the Department needs to ascertain.
 - The one month exhibition time is inadequate for assessment of a **State Significant Development** for which there are about forty-five separate documents to read. It should be two months at least and preferably three. Members of the public, especially those who are working and/or who are not fully *au fait* with related documentation or legislation, just don't have the time otherwise and so are denied a proper voice in the process.
 - The pre-Christmas season is a very busy time for many people. Lodging an application for exhibition in this period seems to be a cynical attempt to sneak under the public radar and so deny people a proper voice in the process. A SSD application on exhibition at this time should require a minimum 2 month exhibition period.
 - The application appears to have been put together hastily/cynically and without adequate information in order to make the last possible exhibition period for 2015. It doesn't comply with the Secretary's Environmental Assessment Requirements (SEARs) related to providing information on:
 - the cumulative impacts of noise,
 - the specifics of proposed landuses and their locations within either Campbell's Stores or the proposed new glass box,
 - the details of patron capacity and hours of operation related to specific uses,
 - the proposed new building's compatibility (or otherwise) with adjoining buildings,
 - a plan of the proposed divisions and usage of the strata lots proposed
- These omissions make it impossible for the Department to assess the application properly. Stakeholders, and the public at large, can only submit responses based on a partial knowledge of what's proposed. At the same time, these omissions seem to represent further evidence of the applicant's attempt to camouflage the real nature of its proposals.

- An application should not go on exhibition unless it has included all the relevant documentation required for its assessment. In this case, the failure to provide the information listed above, means that the application cannot be fully assessed in relation to its impact on the amenity of local residents/workers or on that of guests at the adjacent Park Hyatt Hotel or on the appropriateness of its proposed usage of one of the most important heritage sites in Sydney.
- There are a considerable number of inconsistencies between recommendations/requirements provided in Consultants' reports and the architects' design proposals. Equally, design proposals fail to resolve inconsistencies between Consultants' recommendations. For example:
 - designs fail to make allowance for the wind barriers needed to address noise level requirements in the proposed outdoor eating areas
 - the ventilation report recommends that windows on Hickson Rd need to be **open for most of the year** yet the noise assessment report fails to address the impact of this.
 Again, this seems to point to the haste with which the applicant wanted the application to be put on exhibition.
- The title of the application – 'Remediation, Renewal and Adaptive Re-Use of Campbell's Stores' (SSD 7056) is misleading. It makes no mention of one of its most significant and highly controversial aspects – the applicant's desire to erect a four-storey high contemporary building (effectively a glass box) right next door to the very building whose heritage it's claiming to want to protect. There don't seem to be any remediation works proposed despite this being the first word of the project title.

This would appear to be another cynical attempt to have the application sneak under the public radar. Applications should only be allowed on exhibition if they have a title that reflects all of their key aspects.

- If any further development is to be considered on this section of the Harbour foreshore - right next door to one of the most significant buildings in The Rocks and right opposite the World Heritage-listed Opera House – the public needs to be fully informed of it. The fact that the application is on exhibition does not achieve this, especially as the title is so misleading.
- I don't believe there should be any building obscuring the northern side of Campbell's Stores. If there was to be one, its design should be decided by competition and the development of the site should be open to public tender.
- The Stakeholder consultation process was flawed. Information provided at the two Stakeholders' meetings that I attended was not true - i.e. it was a lie - and as such, a deliberate attempt to mislead Stakeholders. We were told that the intended use of the proposed new building was 'up market retail'. The application does not mention this as an intended use but instead talks (but fails to provide details) of the 'use of existing and proposed building and reconfigured outdoor dining area for restaurant, cafes and bars ...'. Stakeholders were told that there would be no trading beyond midnight but the applicant asks for trade to 2 am.
- The consultation process was selective with regard to the information it included in the EIS. The EIS ignores two issues raised in the Stakeholders' meeting I attended:
 1. The request that the application include photomontages showing views of the proposed new building from the east without the existing fig tree. While the fig tree is very attractive, its roots have already caused considerable damage to the Park Hyatt Hotel and for that reason alone, its long term existence is uncertain. The applicant implies that the fig tree softens the impact of the glass box. Decision makers should be shown pictures indicating the reality of the proposed new building – as the 'stand-

alone' building it would be. If the applicant thinks it needs to be hidden, it shows that the building is clearly one at odds with its setting, as well as unattractive in itself.

2. The request for the specifics of building and development consents for the one-storey pavilion currently attached to Bay 11 of Campbell's Stores. The Campbell's Stores' Conservation Management Plan (CMP) describes this structure as 'intrusive' and states that it should be removed.

Stakeholders, including the Heritage Council, were told that the structure was erected prior to the current tenancy (i.e. that of Dockside Group, one of the applicants within the newly formed Tallawoladah Pty Ltd). This is not true. There has been significant reconstruction work done since 2002 to enclose what was a pergola and to raise its roof, yet the applicant cannot provide any approvals for this work. I trust the Department will investigate this further so as to prevent the applicant using this existing, and apparently unapproved, structure as justification for erecting a new and even less appropriate building in its place.

- In 2014 SHFA engaged Godden Mackay Logan to prepare the *Campbell's Stores Conservation Management Plan* (CMP). The Heritage Council of NSW subsequently endorsed this plan on 15 July 2014. It is currently the principal guiding document for Campbell's Stores' conservation and development. Despite this, the applicant seems to be relying on a document called *Campbell's Stores Architectural and Public Domain Study* (2012). This document has no statutory weight, has never been formally exhibited or adopted and so should not inform any planning for this State Significant site.
- For reasons of consistency, this application needs to be considered in conjunction with SHFA's separate SSD application (7246) for public domain and foreshore works and not in isolation from it.
- There was a period of time over the weekend of 5-6 November when people couldn't submit their objections online, the Department's preferred means for this. I know of two people who experienced this and spent quite some time in the process. There could have been many more and some may have just given up and not been in the position to lodge their submissions by other means.

HERITAGE

My second submission is an objection on **HERITAGE** grounds in relation to:

1. The Campbell's Stores' building and
2. The proposed four-storey high glass building which the applicant would like to locate immediately alongside it.

The basis for my objections on these grounds is shown below:

1. The Campbell's Stores' building

The project title is 'Remediation, Renewal and Adaptive Re-Use of Campbell's Stores'. The focus is 'adaptive re-use' of Campbell's Stores to create the spaces best-suited to the applicant's restaurant, café and bar related fit-outs - and presumably also strata sub-divisions. The 'renewal' seems to be a re-working of the building to accommodate more effective and/or appealing business enterprises; there seems to be more destruction of the existing fabric of the building than 'remediation'.

The heritage significance of the Campbell's Stores' building

- Campbell's Stores is located within The Rocks' heritage precinct and is one of the most important of its remaining heritage buildings. It is a three level sandstone, brick and slate building of state heritage significance and the only surviving 19th century warehouse still in existence on the foreshores of Sydney Cove. Campbell's Stores is a superb example of buildings of this type and from this period and is all that survives of what was once an important wharf and store complex within Campbell's Cove.
- The Stores' building comprises 11 gabled bays with a regular pattern of window and door openings. The first bays were constructed in stages from the 1850s to the 1880s; Bay 11 was constructed in the 1890s. In keeping with the security needs of bond stores, there were initially no internal connections between them. Then, in the 1880s, the ASN Company constructed a third level, with interconnections between the bays. Over a 120-year period, a succession of different merchant companies conducted their businesses in Campbell's Stores.
- Campbell's Stores is local landmark, important for its location within the heritage streetscape of Hickson Road and for its visibility from the World Heritage Listed Opera House as well as a wide area of Sydney Harbour.
- The Stores are an important historical source of information on Sydney's early maritime activity especially in relation to the change over time related to its building design and layout, warehouse activities, maritime procedures and technology.

Change and its implications

- The adaptive re-use of the Stores from the 1970s to create a series of restaurants has seen the building take on new commercial activities although not always in ways that have respected or enhanced people's appreciation of the Stores' significance. Old openings were closed up and new ones created; the front of the building was largely hidden by outdoor eating areas with fake sails overhead; and c. early 1990s, the northern end was hidden by a pergola, constructed to accommodate patrons of the *Italian Village* restaurant.
- Over a number of years, since 2002, tenants have totally reconstructed this pergola structure, with the inclusion a new and higher roof, the erection of decorative lattice screens, the installation of glass doors and walls behind the screens, and the internal

lining of the roof and glass walls. The applicant has been unable to provide any approvals for these works, which now completely obscure the ground floor level of Campbell's Stores building at its northern end.

- While the project title gives the impression that the applicant proposes to bring about the 'Remediation, Renewal and Adaptive Re-Use of Campbell's Stores', a close reading of the documentation indicates that the focus is on 'adaptive re-use' and that the end result of that would be
 - the creation of new voids (rather than the re-use of existing voids within the Stores or the re-instatement of the original voids). This ignores the opportunity to restore, reconstruct and/or interpret the original internal spaces and so does not address the ongoing conservation of the Stores.
 - the introduction of a series of new openings in the floors (presumably with the existing voids being closed over). Again, this undermines the Stores' ongoing conservation.
 - further incursions into the fabric of the building to facilitate increasing its current 4 tenancies to 'approximately 13' and so further subdivision. This addresses the commercial goals of the applicant at the expense of conserving heritage elements of the building and/or restoring its warehouse configuration. The extent of these is hard to assess as the applicant hasn't provided a sub-division plan or details of the specific usage of the strata lots proposed (reason in itself for this application not to be approved). However, given that the Stores' internal spaces and original internal fabric are ranked as 'Exceptional', the new subdivision of the building will result in further destruction of its original features and materials, further limitation of people's ability to interpret its original warehouse uses and the introduction of materials and features which additionally undermine the Stores' heritage significance.
 - the consolidation of 9 kitchens currently scattered throughout the building into a grouped arrangement (details not provided). Once again, this suggests significant change to the building's current form with resultant negative implications for its 'original fabric and further damage to heritage features and significance (see above).
 - widening of the existing c.1915 openings on the Hickson Rd frontage to create three new and much larger concrete entry portals. Creating these openings will destroy sections of the building's early sandstone brickwork and the end product will encroach upon the City of Sydney's existing pedestrian footpaths. The openings will all have back-lit signs and the centre opening will cut right through the building further damaging its original fabric.
 - the creation of outdoor eating areas, with chairs, tables and umbrellas on Hickson Rd. While this is an appealing image, it would reduce visibility to this (western) side of the Stores and limit people's opportunity to appreciate the building's original form and function. This western elevation is the side that is most in keeping with the original form of Campbell's Stores and the one that most reveals the Stores' 19th century character. To maintain its heritage significance, this façade needs to be kept intact as much as possible.
 - the removal of the existing awnings and canopies adjoining the eastern elevation of the Stores. This is the elevation that faces the foreshore and the Opera House so removing these intrusive elements would reveal the building they currently hide. However, this improvement would be short-lived. The applicant wants to replace the old intrusive elements with new ones - stand-alone canopies that feature perforated precast concrete roofs. These are not transparent and so will prevent the public having clear views of the eastern (foreshore) side of Campbell's Stores.
 - 1.8 metre high vertical wind screens that will further limit people's ability to see and

- appreciate this heritage building,
- the creation of two new openings in the south elevation and the closure of one of the heritage openings. This will be a missed opportunity to reveal this elevation in its original form and a further blow to the building's heritage significance.
- the contravention of a large number of policies within the Campbell's Stores Conservation Management Plan (CMP), which SHFA commissioned and which the Heritage Council endorsed in July 2014, only 18 months ago. These include:

Policy 1

The future use of Campbell's Stores should be consistent with its outstanding cultural significance, should not impact on significant fabric and spaces, and should provide for public access to the building.

Policy 8

Significant fabric should be conserved using conservation processes appropriate to the assessed level of significance. Restoration and reconstruction should aim to recover or reveal significance.

Policy 11

External alterations or additions should be discouraged; however, if required to meet approved interpretation, re-use or cultural tourism requirements, these should be of a minor nature, and subservient to the primary architectural features and composition of the existing structure. New works should not obscure significance.

Policy 13

An appropriate physical and visual setting should be maintained for Campbell's Stores by allowing no development within the setting that would adversely impact on the place or on views to and from the place.

Policy 18

Any new development must respect the cultural significance of the property and its setting and not destroy or obscure historical associations. The introduction of new fabric should be undertaken in such a manner that it does not result in a lessening of the cultural significance of the place. New work should be identifiable as such and should, wherever possible, be

2. The four-storey high glass building

The affront to heritage that the proposed glass building represents makes me wonder if it's just a ruse to distract attention from the weaknesses in the applicant's supposed heritage-related proposals for the 'Adaptive Re-Use of Campbell's Stores' (see above). However, it's there in the application so I'll state my strong objections to it on the following grounds:

- It is the worst of the applicant's proposals. It would intrude onto Campbell's Stores' heritage curtilage as designated in the Campbell's Stores Conservation Management Plan (CMP) and destroy any sense of the Stores' past nature and significance.
- The glass building would comprise three levels sitting on four columns. It would have the appearance of a tall and bulky glass box on stilts and would obscure all of the Stores' northern elevation. Its minimal 2.5 metre undercroft would be oppressive and tunnel-like and this, along with its intended use for outdoor eating, would serve as a barrier, limiting public access to the foreshore and severely constraining existing views to the Opera House from this location.
- The proposed glass box would be located next to Bay 11 on the northern elevation of Campbell's Stores. When measured from the proposed new ground level, it would be 13.3 metres high with the inclusion of its 1 metre high lift overrun. This exceeds the height restriction on the foreshore frontage by 14.5m, more than 250% and on the Hickson Road elevation by 10.5m, or 140%. This would require a significant spot re-zoning under the

Sydney Cove Re-Development Authority Scheme (SCRAS). One-off variations to this should not be permitted in advance of the Premier's holistic review of planning for the Sydney harbour foreshore.

- Given this height and bulk, the proposed new four-storey glass box would dwarf the heritage-listed Stores, dominate the Campbell's Cove foreshore and be the tallest building on this section of the Hickson Rd streetscape.
- The proposed new ground level would be 1.94 metres higher than the existing one so as to accommodate a basement area. Contrary to claims that there would be a four metre setback between the two buildings, the basement level of the glass box would abut the Stores and effectively bury the ground floor of the Stores' 'Highly Significant' northern façade almost to the tops of its existing windows. This is shown very clearly in the following sections of JPW's Design Statement – the northern elevation profile (p.96,) the Concepts diagram (p.102) and the Bay 12 'adistic imdression' (artistic impression?) listed for the 4th of the series of 'Day 12' (Bay 12?) images. (no page number given). The 5th 'Day 12' image on the following page omits showing the upper section of the windows. It therefore misleads the reader as to the significant extent to which the raised ground level 'buries' the northern elevation of Campbell's Stores.
- The deficiencies in the building's design for this site are evident in the Visual Impact Statement which states that *'The proposed new building at Bay 12 is primarily obscured from view by the adjacent Fig tree thus limiting its degree of intrusion to the character of this zone'*. If the building needs to be hidden from view, it's clearly inappropriate in this location. As to the fig tree, what are its chances of survival? The arborist's report states that 4 metres of its canopy would need to be lopped off to enable construction of the new building. The Architectural Design Statement notes its already negative impact on the adjacent storm water outlet. (Architectural Design Statement, p.36).
- Construction of this building would be at odds with the guidelines for Policy 13 of the CMP: *'The need to retain a suitable setting for Campbell's Stores should be considered when assessing any proposal for new development or alterations within or around the site. No development that would detract from the maritime setting of the property or obscure key views to or from Campbell's Stores should be permitted.'* (CMP, 2014, p.168)
- The application does not state an intended specific use for this building so one can only assume that it falls within the very general description of proposed usage as cafes, bars and restaurants. This fits with suggestions as early as May this year the applicant was canvassing 'expressions of interest' for 16 eating venues on the Campbell's Stores site (see *Hospitality* magazine, May 2015). However in consultation meetings in September, the applicant told stakeholders that the building's intended use was 'up market retailing'. No building should be approved without a clear indication of its specific use, and particularly not one with such negative impact.
- The building would be located within the buffer zone of the World Heritage Listed Sydney Opera House. Objectives for the zone expect *'[recognition] that views and vistas between the Sydney Opera House and other public places within that zone contribute to its world heritage value.'* (Cl. 53(2)(b), *SREP (Sydney Harbour Catchment)* 2005). The glass box would disrupt the view of 19th century Sydney that visitors and locals can currently enjoy from the Opera House.
- The glass box would contravene the Opera House's 2005 Management Plan which requires any development within the buffer zone to maintain, protect and enhance views to The Opera House. The glass box would limit currently available public views of the Opera House from the space between Campbell's Stores and the Park Hyatt Hotel As someone said recently, 'it would be like viewing the Opera House through a slit in a letter

box'. The application does not include any analysis of this impact, although it should have done so.

- The glass box would destroy the opportunity for people to appreciate Campbell's Stores' significance as a stand-alone industrial building within its maritime setting. It would obscure views of the northern elevation of Bay 11. This would be particularly the case for people trying to view the Stores from the northern end of Hickson Road, from the pedestrian pathway on the eastern side of the Sydney Harbour Bridge and from Dawes Point Park. (see Appendix C2 Photomontages 6a and 7a). Its raised ground level would 'bury' most of the ground floor of the Campbell's Stores northern elevation.
- Campbell's Stores has been a stand-alone building for most of its life and certainly since about 1902. Prior to that only minor structures and a single storey cottage were within the area to the north of Bay 11. The Stores have never been seen as part of a continuous street façade of mixed architectural styles (as the applicant has recently claimed). Rather, the Stores were for most of their existence 19th century waterfront warehouse buildings, of simple utilitarian design, viewed in the whole. To 'fill the gap' between the Stores and the Park Hyatt and treat this part of the site as an 'infill site' as the architects have recently described it, is to irrevocably and detrimentally alter the heritage setting of the Stores and the historical context within which it will be appreciated.
- Retaining Campbell's Stores' historic physical and visual connection to the waterfront is essential. No development should be carried out which has any possibility of compromising this connection. A new public space would provide the opportunity for the thousands of people who visit the Rocks to actually see the Campbell's Stores northern elevation. Importantly, it would deliver the Stores' full heritage curtilage.
- This is a major proposal virtually hidden within a State Significant Development application misleadingly entitled 'Remediation, Renewal and Adaptive Re-Use of Campbell's Stores'. It would be wrong to inflict this glass box on the public, when the project title had not even alerted people to what was proposed.

Conclusion

The applicant's proposals might be suitable if Campbell's Stores was any ordinary building, whose owner/leaseholder was embarking on a program of renovation and refurbishment to attract more customers to an expanding number of restaurants. If that's all it was, and it wasn't in such a sensitive location, I wouldn't be lodging this objection.

But Campbell's Stores isn't any ordinary building. The building is Government-owned and it's situated on Government-owned land. Heritage experts judge it to be of 'Exceptional' significance, other than Bay 11, which they judge to be of 'High' significance.

What the applicant proposes is a poor response to heritage issues affecting Campbell's Stores. Campbell's Stores is too important a building, in too significant a location, to be sacrificed to what is essentially a commercial venture dressed up as 'remediation and renewal'. Placing a four-storey high glass building alongside it would be an even greater travesty.

The Campbell's Stores Building is located on a part of Sydney's foreshore – west Circular Quay - that is as prominent as Bennelong Point and far more prominent than Barangaroo. Campbell's Stores are for Sydney a heritage treasure in a magic location. We should be realising this potential not destroying it.

The architects who designed the glass cube (JPW) claim the pyramid at the Louvre inspired their design. Discussions in this vein must have been highly amusing during breaks for coffee (or whatever substances they were consuming) or perhaps at Friday evening drinks' sessions. It might have helped if they'd had a closer look at I.M. Pei's building and gave more consideration to its function and suitability to the site on which it stands as opposed to their own glass cube and the site on which they'd like to impose it.

The *Pyramide du Louvre* has major functional impact and minimal visual impact. It's the main entry to the Louvre for more than 9 million visitors a year. JPW's cube has zero functional impact and major visual impact. Its proposed use seems to be three levels of restaurants, bars and cafes with outdoor seating that, like the building itself, would restrict existing public access to the foreshore.

While Pei's pyramid is transparent, JPW's glass block cube would not be. Its bulk and the density of its materials would obscure the heritage building next to it and interrupt, rather than expand upon, the public's visual and actual connection to the foreshore beyond. And all that for only 296.2 m² of usable floor space!

It seems to me that the more likely inspiration for this cube was a c.1960s four-storey blond brick office building with undercroft car parking.

The Rocks is the only area of Sydney with a strong association with the early history of European settlement. That heritage is the precinct's main attraction and it should be enhanced not undermined by intrusive and competing elements that would devalue this significance. The glass box would completely dominate the simple 19th century architecture of Campbell's Stores, its foreshore and its streetscape. It would contribute nothing to its functionality. Any notion that it represents 'urban renewal' in this context is an absolute joke.

The proposed development fails to deliver an appropriate and considered response to this historic site on the foreshore of Sydney Harbour and within the buffer zone of the Sydney Opera House. The proposal in its current form should be refused and there should be no development to the north of the Campbell's Stores.

The land proposed for the new building is in public ownership and it should be utilised in its entirety for public access and open space to provide a low key recreation area where people can sit, view, reflect on and enjoy Campbell's Stores, the Opera House and Sydney's Harbour. This would facilitate Campbell's Stores being visible on all four sides as it has been for most of its existence. It would allow the thousands of people who visit the Rocks to actually see the Campbell's Stores northern elevation and it would deliver the full heritage curtilage as described in the CMP. It would increase space for public access to and from the foreshore, especially at celebrations like New Year and Vivid. It would relieve what can be a bottleneck at this very popular entry point to the foreshore.

As I've already indicated above and in my submission on PROCESS, the applicant has either not provided the necessary documentation to support SSD 7056 or has provided information that is inaccurate or misleading. For that reason alone, the application should not be approved.

Given the Premier's recent announcements regarding a review of government-owned lands around Sydney Harbour and the revitalisation of the entire Sydney Cove foreshore, approving

a new four-storey building in Campbell's Cove, outside that process, would be inappropriate and certainly premature. Government-owned lands, especially along the Sydney Cove foreshore, should be considered as a whole, not bit by bit.

Campbell's Stores and its environs is an 'Exceptional' heritage site. Anyone willing to approve this glass cube, will have her/his place in the history books, remembered, like Joe Cahill, of Cahill Expressway fame, more for what he got wrong than for his achievement in approving the Sydney Opera House.

State Significant Development Application and Variation of the Sydney Cove Redevelopment Scheme for the '*Remediation, Renewal and Adaptive Re-Use of Campbell's Stores*', The Rocks (SSD 7056)

My third submission is an objection on the grounds of **AMENITY**, or more specifically the way in which the proposals outlined in this application would impact negatively on the pleasant and largely tranquil nature of the heritage environment of the Campbell's Cove foreshore, the Hickson Rd streetscape and daily life within that area as experienced by locals and visitors alike.

Devaluation of our heritage environment

While The Rocks' heritage reputation attracts millions of tourists each year, it is also a local neighbourhood and community, whose residents strongly identify with and value its historic past. The proposals in this application suggest that the applicant views Campbell's Stores, a building of 'Exceptional' significance, as an ordinary building, in an extraordinary location, whose potential is waiting to be exploited in the quest of expanding a restaurant empire.

Currently, Campbell's Cove residents and visitors enjoy an environment dominated by largely 19th to early 20th century buildings. There is a sense of their strong historical association with waterfront activities. For locals, especially those at 8 Hickson Rd, the approval of SSD 7056 would cause a major damage to the heritage environment in which they have established their homes and the streetscape and foreshore they value and enjoy.

The Glass Box

- The Hickson Rd streetscape is one of largely heritage buildings from George St all the way to Towns Place. The glass box proposed for the northern side of Campbell's Stores would look as though someone had parachuted it in. It would have no visual or aesthetic relationship with the heritage building on one side of it or the sympathetic, modern lines of the Park Hyatt Hotel on the other.
- The glass building would have the appearance of a tall and bulky glass box on stilts. It is the worst of the applicant's proposals and would substantially contradict the heritage environment of Hickson Rd and the Campbell's Cove foreshore.
- When measured from a new raised ground level, the glass box would be 13.3 metres high with the inclusion of its 1 metre high lift overrun. This exceeds the current height restriction on the foreshore frontage by 14.5m, i.e. by more than 250% and on the Hickson Road elevation by 10.5m, or 140%. It would be a full storey higher than Campbell's Stores' gutter with the lift overrun making it higher again. (Design Statement diagram p.96). It would be higher than the Park Hyatt Hotel alongside it. Building plans suggest that the way has been left open for further expansion in the future.
- Given this height and bulk, the proposed new four-storey glass box would dwarf the heritage-listed Stores, dominate the Campbell's Cove foreshore and be the tallest building on this side of the Hickson Rd streetscape.
- The desire to encroach further on the Stores' heritage curtilage, rather than fully restore it, shows little concern for enhancing the building's historic value. The proposed glass block building is an anathema in this sensitive location. It is contrary to what entices tourists to visit the area and would contribute nothing that would enrich the local community.
- Photomontages showing how the glass box would look make me think of a c.1960s four-storey high, blonde brick, flat roofed office block with undercroft parking. That at least, while not aesthetically pleasing, would have been highly unlikely to have been approved in a foreshore heritage precinct or be located right within an 'Exceptional' heritage site.

Campbell's Cove locals, visitors and tourists would gain no benefit from this intrusion on their landscape and it would do nothing to enhance the source of The Rocks tourist dollar – heritage tourism. It would add another 296 m² of space to someone's restaurant empire but one that would be at huge cost to our city's heritage environment.

- The proposed glass building has no local affinity, uses no local materials and is out of place with the local colour palette. It strikes a discordant note among the harmonious context into which it would be dropped. It's a building that would have as much relevance to the desert as it does to the harbour foreshore.
- While there's a place for this 'international style' modern architecture, it's not appropriate to parachute such a building into a precinct whose principal feature is its heritage architecture, particularly when Sydney and Australian cities generally have so few comparable areas and none as distinctive. As I indicated in my second submission, any comparisons with the Louvre Pyramid are laughable.
- The glass box would intrude Campbell's Stores' heritage curtilage as designated in the Campbell's Stores Conservation Management Plan (CMP) in a far more visually powerful way than the existing pavilion, which while 'intrusive' in heritage terms, does not seek to dominate the space between the Stores and the Park Hyatt. The CMP stated that the existing pavilion attached to Bay 11 of Campbell's Stores should be removed. It did not envisage that it be replaced by a building at least four times as large and immeasurably more dominant and more 'intrusive'. The box contravenes the CMP. Demolishing the apparently unapproved pavilion creates the opportunity to deliver Campbell's Stores full heritage curtilage.
- The Stores have never been seen as part of a continuous street façade of mixed architectural styles (as the applicant has recently claimed). Rather, the Stores were for most of their existence 19th century waterfront warehouse buildings, of simple utilitarian design, viewed in the whole. They have had a large gap at each end. To 'fill the gap' between the Stores and the Park Hyatt and treat this part of the site as an 'infill site' as the architects have recently described it, is to irrevocably and detrimentally alter the heritage setting of the Stores and the historical context within which people can appreciate them.
- There is no building that would suit this space. It should be left alone. To retain our heritage environment, it should be dedicated public space that restores the Stores' historic curtilage and destroys barriers to public access to the foreshore. A new public space will provide the opportunity for the thousands of people who visit The Rocks to actually see the Campbell's Stores' northern elevation and enjoy the space that delivering the Stores' full heritage curtilage, would open up for them.

Campbell's Stores

- The proposed changes destroy or obscure many of Campbell's Stores heritage features. The glass box would destroy any sense of Campbell's Stores' as a stand-alone industrial building within its maritime setting. It would obscure views of the northern elevation of Bay 11. This would be particularly the case for people trying to view the Stores from the northern end of Hickson Road, from the pedestrian pathway on the eastern side of the Sydney Harbour Bridge and from Dawes Point Park. (see Appendix C2 Photomontages 6a and 7a).
- The western, most historically intact side of Campbell's Stores would have three wide openings cut into its original sandstone bricks and the centre opening will cut right through the building. This will facilitate outdoor dining or coffee shops. With no shortage of eateries in The Rocks, for locals, this heritage loss is a high cost to pay for yet another dining area. Perhaps Campbell's Stores should not be used for restaurants at all.

- The CMP calls for a ‘*generous public walkway*’ along the Stores’ eastern façade to provide increased and improved public access to Campbell’s Stores from Hickson Road and sees this as adding value to the site in both community and economic terms.

The applicant proposes a 3 m walkway between the building and the vastly expanded outdoor dining area. This is supposed to encourage the general public to come closer to the building. That’s just nonsense. People could only access it via the restaurant seating area. It would be a service area for restaurant staff and ultimately also provide space for additional diners. It would increase the visual barriers to the building and restrict people’s views of the outside of Campbell’s Stores.

Loss of Views and Visual Amenity

When I look out my living room window, what I see first, immediately across the road is Campbell’s Stores, with its gabled bays, saw-toothed roofline, repetition of door and window openings and its simple, warehouse functional, 19th century architecture.

In the distance, the dominant view is the Opera House. It’s a magic view and I’m extraordinarily lucky to have the enjoyment of it. It’s a view that other residents in our building also enjoy and one to be preserved for future lucky residents to enjoy as well. Our guests agree. I imagine guests at the Park Hyatt Hotel would feel the same way.

The glass box would create a distracting visual barrier to this view. My attention would firstly be drawn to its lift overrun; its glass blocks would make me feel that the privacy of our home had been invaded; its bulk, excessive height and general inappropriateness to its surroundings would promote a ‘look at me!’ attitude that would be hard to ignore. It would dominate the Hickson Rd streetscape, be the tallest building on its eastern side and dwarf Campbell’s Stores’ significance, which Park Hyatt guests would no longer be able to see. They’d be facing a wall of glass blocks and thinking ‘How could anyone have allowed that to happen?’

- Currently, when walking south along Hickson Rd, we can see the upper two storeys of Campbell’s Stores’ northern end. The box would hide the entire building and ‘bury’ its ground floor under a new, nearly 2 metre higher, ground level so as to accommodate a basement area for the glass box.
- The glass building’s minimal 2.5 metre undercroft would feel oppressive and tunnel-like. This, along with its intended use as an outdoor eating area, would serve as a barrier that locals and visitors would have to pass through before any views of the Opera house would emerge. As someone said recently, this 2.5 metre high undercroft would make existing views of the Opera House seem like ‘looking at it through the slit of a letter box’.
- This building, almost opposite the home where I’ve lived for the past thirteen plus years, would be an eyesore and one that residents, hotel guests or anyone who once enjoyed the local heritage landscape, couldn’t escape.
- Even the applicant’s consultants think it doesn’t fit in with our heritage streetscape and foreshore. As the Visual Impact Statement indicates, they think it should be hidden: ‘*The proposed new building at Bay 12 is primarily obscured from view by the adjacent Fig tree thus limiting its degree of intrusion to the character of this zone*’. This is my street they’re talking about. It’s a street Sydneysiders, visitors and tourists all appreciate for its heritage significance. But, if the building needs to be hidden from view, it’s clearly inappropriate in this location (and perhaps better suited to a site across the road from where its architects themselves live). The tree would be lucky to survive its construction.

- Currently there is a regular sequence of spaces between groups of buildings along the foreshore with an average 20-25m distance separating them. The proposed glass box would decrease the distance in this location to approximately 10m. This will not only disturb the outlook from Hyatt Hotel's balconies but also create an impression of density and scale that is not in keeping with character of the area. It will create an impression of overdevelopment by restricting the rhythm of space to built form.
- Instead of being able to stroll to the foreshore via a relatively open pathway, we would be confronted by the height and bulk of a building at least 4 times as high, many more times as intrusive as the existing pavilion, and one which would create a visual and a physical barrier to foreshore access.
- The 1.8 metre high vertical wind screens proposed for Campbell's Stores will further limit people's ability to see and appreciate this heritage building,
- The applicant wants to replace the Stores' old intrusive elements with new ones - stand-alone canopies that feature perforated precast concrete roofs. These aren't transparent and so will obstruct views of the eastern (foreshore) side of Campbell's Stores.

Noise Impact

- **Increased noise**

While the applicant doesn't supply a subdivision plan to clarify the specific allocation of strata lots within the two buildings, cafes, bars, restaurants and function centres seems to be the intention. The applicant also requests 'flexibility to **periodically** provide for cocktail party capacity and dinner gala space for **2,000 guests**' (Architectural Design Statement, Section 3.1.2, p.31). 'Periodically' is not defined, nor is it clear whether the 2000 guests would be indoors or outdoors. Both need to be clarified before this application could be determined and stakeholders and the public need to have the opportunity to respond to the additional information when it is divulged.

From what we know so far, the proposals for how these dining venues would operate, indicates very negative consequences for guests at the Park Hyatt Hotel, located next door to the proposed four-storey high glass box and for those at 8 Hickson Rd, immediately opposite Campbell's Stores:

- **The proposed hours of operation are excessive**

The applicant is seeking approval for the following hours of operation:

- Monday to Saturday 6.00 am to 2.00 am (the following day) and
- Sunday from 6.00 am to midnight

These hours vastly exceed the current operating hours of the restaurants located in Campbell's Stores. These generally don't open until 10 am at the earliest and close by 12 am at the latest. The proposed changed operating hours would **increase trading hours by a minimum of 6 hours/day Monday to Saturday and a minimum of 4 hours/day on Sundays**. Trading beginning at 6 am seven days/week and not finishing until 2 am six days/week, would have an unreasonable negative impact on the residents living immediately across the road and guests staying at the 5 star Park Hyatt Hotel next door.

If these very long trading hours were approved and the applicant was operating two buildings, incorporating 16 areas of cafes, bars, restaurants and function centre, guests of the Park Hyatt and local residents, especially at 8 Hickson Rd would be **denied the quiet enjoyment** of their homes and hotel suites. Their peace and quiet would be threatened by noise disturbance with noise, including amplified music, emitted from the premises, and the noise of boisterous departing patrons in the early hours of the morning.

The application doesn't clarify the opening hours of outdoor dining in the proposed largely increased (double the existing) dining areas on the eastern side of Campbell's Stores, nor that in the proposed undercoft area of the glass box, nor in the area of the western side of Campbell's Stores,

During the first of two Stakeholders' consultation groups I attended, the applicant, in answer to a specific question on operating hours, said they would not exceed those currently applied. This is clearly not the case and is yet another example of the misleading and inaccurate information supplied to stakeholders. Noise impacts on residents as a consequence of late night/early morning trading hours would be significant.

Residents have had a number of negative experiences from Dockside Group (one of the partners in Tallawoladah Pty Ltd – i.e. the applicant). In the past, excessive noise not contained within the *Italian Village* restaurant has meant we haven't been able to open our windows on hot summer nights or just to enjoy fresh air. Our attempts to complain directly to the Manager on duty have been largely unsuccessful. This only changed for the better when the operation of the *Italian Village* as a function centre was curtailed in the build up to the lodging of this application. There should be no function centre at the northern end of Campbell's Stores.

The application fails to provide any details about the various uses within the existing Campbell's Stores, the increase in tenancies from the current four (4) to thirteen (13), and it seems an additional three (3) in the glass box. It fails to provide an overarching Plan of Management that

- addresses the large number of people that might patronise potentially sixteen (16) disparate restaurants, cafes, bars and function centres;
- considers patron management, noise and security; and
- addresses anti-social behaviour.

The application cannot be assessed on trust that the applicant would address these issues. The applicant must supply the detail. Residents must be given the opportunity to respond.

- **Noise emitted through the proposed 'open window' ventilation design** will severely impact residents at 8 Hickson Road and guests at the Park Hyatt Hotel.

The current operation of the restaurants in Campbell's Stores impacts on residents at 8 Hickson Road when the doors that front Hickson Road are left open. This currently occurs only occasionally when guests leave these open.

The ventilation design for the renovated Stores proposes a passive/natural ventilation system which will necessitate the windows facing Hickson Road being left open for much of the year. Part 5 of the JPW Design Statement states,

'... For much of the year it will be possible to take advantage of moderate ambient conditions and operate the building in passive/natural ventilation mode... Thanks to the inherent passive features of the building ... building occupants will be able to enjoy the space with the windows open and air conditioning systems turned off. There is opportunity for cross flow natural ventilation from East to West on the first and second floors and, as described below, the kitchen exhaust systems will help to draw air through the building even on still days. Text provided by Northrop Engineering '

Neither the Noise and Vibration Impact Statement nor the Environmental Impact Statement (EIS) appear to have assessed the impact on residents at 8 Hickson and guests at the Park Hyatt Hotel of noise, including amplified music, from restaurants and bars, as a consequence of the proposed 'open window' ventilation design.

- **Information provided is inadequate**

The noise, wind and air assessments that accompany this application are based on a range of assumptions and suggest that further detailed elements would be addressed at the development stage. This is inadequate. It is normal practice to address these at the time of application. Given the misleading and inaccurate information already supplied, nothing should be taken on trust. No determination can be made without applicant supplying the facts of what is proposed and residents having the opportunity to respond to them.

- **Noise and fumes from the kitchen exhaust system emitted from the roof of Bay 11 will impact negatively on the local residents, especially those at 8 Hickson Road and guests at The Park Hyatt Hotel**

The proposed kitchen exhaust system intends to direct all kitchen exhaust through the roof of Bay 11. This is the location likely to have the greatest noise and fumes impact on occupants of both 8 Hickson Road and the Park Hyatt Hotel.

The existing kitchen exhaust system, which serves a smaller number of kitchens, already emits unpleasant fumes at all hours of the day and night. These affect people working in local businesses, people walking in the street and residents at 8 Hickson Road. This is especially a problem when the wind is blowing from the north-east. All kitchen exhaust should be directed to the southern end of the building where noise and fumes will have the least possible impact on residents and hotel guests.

- **Further assessment needs to be undertaken** to assess noise impacts and address any acoustic and screening measures as part of this application, so that appropriate heritage and visual impact assessments can be prepared. Once again, this should have been included in the application.

The stack height and sound barriers erected to mitigate noise and fumes of the kitchen exhaust will substantially impact on our Opera House views and the enjoyment of our home

It is suggested that the kitchen exhaust stack should be increased in height and sound barriers constructed around the exhaust system so as to mitigate potential noise and fumes impact from the kitchen exhaust system. (Air Quality report and kitchen exhaust 9.2.1 Emission Height).

We currently look out directly at the Opera House from both our living area and the main bedroom. We are very lucky. This is a stunning, unique and highly prized view. The proposed noise and fume mitigation mechanisms will impact on the wonderful views currently enjoyed from our living area and main bedroom and would create a major, negative visual impact on our enjoyment of our home.

Loss of on-street parking on Hickson Rd

- As with many other areas, the application is short on detail here and it's up to the reader to infer/interpret what's proposed.

- The applicant wants to create outdoor dining spaces in the centre of the Hickson Rd (western) side of Campbell's Stores. The intention is to narrow the road (where exactly and for what distance is hard to find in the documentation) and widen the footpath (by how much we don't know). This is likely to result in the loss of on-street parking along Hickson Road, although again, to what extent is not clear.
- Any loss of on-street parking would have a have a negative impact on residents (especially at 8 Hickson Rd) and visitors alike. Tradespeople, delivery services and our guests all need access to street parking in Hickson Rd. This is already a considerable problem in Hickson Road and not one for which people should be further inconvenienced.
- Visitors also are attracted to The Rocks because there is the possibility of on-street parking. This is especially important at weekends when thousands of people come to The Rocks market that runs from George St (just around the corner from Hickson Rd) to Argyll Street and when George St itself is not available for parking.

Conclusion

The application should be refused because of its negative impact on the heritage amenity of the area and on the amenity of local residents and because of its failure to provide the specific details essential to its proposals being fully clarified and capable of informed assessment.

State Significant Development Application 7056 expects us to take a lot on trust. Despite providing a mountain of documents for people to read and respond to in the immediate pre-Christmas period, it remains very vague on the specifics of proposed strata lots and their uses, the areas they would occupy, detailed hours of operation for specific operators and the incorporation of consultants' recommendations into architectural plans. In today's Sydney Morning Herald, a spokesperson for the applicant said the glass box might be used for 'upmarket retail'. Local residents were told the same thing last September, yet this doesn't feature in any of the applicant's allusions to the building's uses. Even if that were the case, and that's unlikely, it would be a fairly trivial use for which to undermine the value of our heritage buildings. But what are we to think, with only inadequate and conflicting information to go by?

The Campbell's Stores Building is located in a highly sensitive area with extremely high visibility. Any amendment to the existing built form requires careful consideration. The applicant expects to be allowed spot re-zonings, huge variations to existing conservation plans and controls to facilitate one group's personal financial goals.

There is a good deal of inaccurate, inadequate and misleading information in the application. The project title itself doesn't even mention one of its key and most controversial proposals – a whole new building. It begs more questions than it addresses. The Government should not contemplate any alteration to existing controls before the applicant addresses the inadequacies and the responses are on public exhibition.

In granting landowner's consent, SHFA claimed it would be saving taxpayer's money by having a private development group fund the work needed on the long neglected Campbell's Stores. Considering the deterioration occurred under SHFA's stewardship, it would be more appropriate for the funds to come from its rent revenues. With SHFA abolished, there might be a better chance of having Campbell's Stores heritage enhanced rather than just allowing the building to serve the needs of entrepreneurial restaurateurs. The only heritage work they seem to envisage is what's essential to keeping it operational – addressing rising damp issues,

upgrading the stormwater infrastructure, replacing deteriorated sandstone and replacing roofing tiles.

The glass box proposal negates any claims that the applicant cares about the Stores' heritage significance. Once the intrusive pavilion goes, the area to the north of Bay 11 should have its open space restored and with the existing 'laneway' down to the foreshore, should become passive recreation space, where what people see is its existing fig tree, grassed and paved areas, perhaps some seating. This would be worth looking at. It wouldn't dominate. It could just be enjoyed for restoring the full heritage curtilage of Campbell's Stores, enhancing the visual amenity of Campbell's Cove and increasing public access to the foreshore.

The proposed development is a high risk, no reward, project for the people of Sydney. The four-storey glass box has a very high risk of negatively impacting the 'Exceptional Significant' heritage classification of Campbell's Stores for no justifiable visual, functional or heritage benefit, either to Campbell's Stores or to The Rocks heritage village. The potential addition of less than 300m² of commercial floor space, packaged in a dominant, intrusive and unsympathetic building form, just does not warrant the risk to such a heritage sensitive location.

Joe Cahill described the Cahill Expressway as 'a striking symbol of Sydney's growth and maturity'. No one thinks that anymore but at least it's functional. The glass box serves no function important enough to threaten our heritage. Compared to other cities in the world, Sydney has few buildings of 'Exceptional' heritage significance. We should be enhancing not undermining the value of those that have survived.

I strongly object to the proposed development, particularly the proposed new four (4) storey glass building to the north of Bay 11. There is insufficient detail in the application to appropriately assess the proposed works affecting a State-listed heritage item or residents and guests in the local area.

Ashley Cheong

From: Maureen Anderson <andersonmaureen088@gmail.com>
Sent: Monday, 11 January 2016 12:19 PM
To: Ashley Cheong
Subject: SSD 7056 'Remediation, Renewal and Adaptive Re-Use of Campbell's Stores', The Rocks
Attachments: Change.org petition.docx

Dear Ashley,

I have already submitted the results for the [change.org](https://www.change.org/p/the-honourable-robert-rob-stokes-minister-for-planning-nsw-government-act-now-stop-the-box-save-the-rocks?recruiter=442398518&utm_source=share_for_starters&utm_medium=copyLink) petition which I launched on 6 December 2015. In the following 12 days, 175 people signed it and so expressed their objections to this DA. Attached is the word document outlining the petition. The petition itself can be accessed at

https://www.change.org/p/the-honourable-robert-rob-stokes-minister-for-planning-nsw-government-act-now-stop-the-box-save-the-rocks?recruiter=442398518&utm_source=share_for_starters&utm_medium=copyLink

regards,

Maureen Anderson (Sidoti)

