

Consultant:

Clive Lucas, O.B.E., B.Arch., D.Sc.(Arch.) (*honoris causa*), Sydney,
L.F.R.A.I.A.

Registered Architect No. 2502

Partners:

Ian Stapleton, B.Sc.(Arch.), B.Arch., Grad.Dip.Env.Law, F.R.A.I.A.
Registered Architect No. 4032

Nominated Architect

Sean Johnson, B.A., Dip.Arch., M.Sc.(Arch.Cons.), R.A.I.A.

Registered Architect No. 4728

Associate:

Kate Denny, B.A., M.Herit. Cons.

KD:kd

17th June 2016

The Secretary

NSW Department of Planning and Environment

GPO Box 39

SYDNEY NSW 2001

Dear Madam,

**Re: Supplementary Submission to the State Significant Development Application and Variation of the Sydney Cove Redevelopment Scheme:
'Remediation, Renewal and Adaptive Reuse of Campbell's Stores, The Rocks' (SSD 7056)**

We write to provide further comment on the potential impacts on the heritage values of Campbell's Stores, The Rocks, as a result of the proposed works outlined in the above project.

This supplementary submission has been prepared on behalf of the owners and residents at 8 Hickson Road, The Rocks, located directly opposite the Campbell's Stores. This letter has been prepared for the Owners Corporation (Strata Plan No. 70158).

To undertake this further assessment, we have reviewed the following documents:

- *SSD 7056: Response to Submissions Campbell's Stores, The Rocks*, prepared by Urbis, May 2016
- *Response to Submissions, Campbell's Stores, 7-27 Circular Quay West, The Rocks*, prepared by GBA Heritage, 12th May 2016
- *Response to Submissions, Appendix B2- Architectural Drawings Parts 1 -3*, prepared by JPW, May 2016

1. The removal of the existing single storey northern pavilion and the erection of a new four (4) storey glass box to the north of Bay 11, referred to as the "Bay 12 building".

Comments:

Our previous objection in relation to replacing an 'Intrusive' element with a new structure still stands. The proposed construction of a new 'glass box' (Bay 12 building) to the north of the Stores building to replace a building ranked as being 'Intrusive' (within the CMP for the place) negates all of the positive effects of the removal of the existing structure.

In addition, our comments in relation to the overall form and scale of the proposed new building also still stand. Although it is noted that the overall height of the proposed 'Bay 12 building' has been reduced by approximately 0.4 metres, this is such a minor reduction that the visual impacts of the new building will not be mitigated.

**CLIVE LUCAS
STAPLETON
& PARTNERS**

Architects & Heritage Consultants

A.C.N. 002 584 189

A.B.N. 60 763 960 154

Clive Lucas, Stapleton & Partners Pty Ltd
155 Brougham Street, Kings Cross,
Sydney, 2011 Australia

Telephone: 61 (02) 9357 4811

Facsimile: 61 (02) 9357 4603

mailbox@clsparchitects.com

www.clsparchitects.com

www.traditionalaustralianhouses.com

As a large, flat roofed, glass box, the proposed 'Bay 12 building' is not considered to be subservient to the primary architectural features and composition of the Stores building, which is of a strong 19th century industrial character of brick with dominant gabled roof forms.

It is acknowledged that infill development in the Campbell Cove area should not be a heritage pastiche and that the design approach for any new building requires imagination and sensitivity to the context. As such, the form, scale and materials of the locality need to be taken into consideration and in our opinion, the new structure is at odds with the dominant 19th century architectural character of the Stores building, the Metcalf Bond Stores, the ANSC Building and the former Mining Museum (Australia Council building).

2. Reconfiguration and upgrade of the outdoor dining area, including removal of the awnings and non-heritage elements (e.g. boat masts) and the erection of new stand-alone canopy/shade structure along the forecourt.

Comments:

Following our review of the amended architectural plans (Section Bay 3- EA-A-3003/B), our previous objection to the form and details of the proposed new eastern awnings still stands. Specifically, the potential impacts of the retractable vertical wind screens along the eastern edge of the forecourt have not been addressed within the 'Response to Submissions' documentation. Based on our assessment, the design for the new canopy/shade structures and the new wind screens do not comply with CMP Policy 13 or the detailed guidelines for sympathetic, replacement structures (contained within the CMP):

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.*

Guidelines:

The existing canopy, the non-authentic ship's mast and the glazed pavilion structure in the northern forecourt should be removed. The existing canopy could be replaced with a new canopy that follows the following principles (refer to Figure 7.1):

- the position of the canopy should provide a generous gap between the canopy and building and should provide sun and rain protection from above, **but should have no fixed glass or plastic pull-down sides;**
- the canopy should be separated into segments to allow views to the building elevation, to allow for a better appreciation of the facade of Campbell's Stores and should be visually permeable, uncluttered and transparent;

The proposed new canopies also retain perforated precast concrete roofs that are neither visually permeable nor transparent and will interrupt clear views of the whole of the eastern elevation by introducing a solid, built structure running horizontally across the principal elevation of the Stores building.

We concur with the comments made by the Heritage Council of NSW submission letter (dated 10th February 2015) which states that "Detailed design of the forecourt should maintain the visual connection between the Stores and the waterfront by avoiding any permanent, delineating elements" (Item 6).

3. Alterations to existing external openings and the introduction of new external openings to the western elevation of the Stores building.

Comments:

Our previous objection in relation to proposed changes to the western elevation of the Campbell Stores building still stands. Campbell's Stores is of 'Exceptional' significance and Policy 1 of the CMP (GML, 2014) states: *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.

The proposed works to the Hickson Road façade not only will result in widening the existing openings they will also introduce new, concrete entry portals incorporating signage. These works should not be approved as they will have a major impact on the significance of the place, dramatically altering the character of the western elevation of the Stores building and introducing non-reversible intrusive elements into a building of 'Exceptional' significance.

The Hickson Road façade is the only elevation at the place that is not cluttered or obscured by later additions and features related to the current uses of the place (i.e. restaurant signage, canopy structures, the intrusive pavilion and the southern brick wall). As such, the retention and maintenance of this elevation as a simply detailed, functional elevation with no further alterations or additions is critical to the conservation of the significance of the place as a whole.

Given that door openings that are capable of providing for public access as required by the current proposal already exist in this western elevation, further alterations and loss of original fabric as proposed, does not appear to be justified.

The proposed alterations to the existing Hickson Road elevation do not comply with the following conservation policy and guideline:

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.*

Guidelines

- The existing building fabric of Campbell's Store both internally and externally, is highly significant and in reasonable condition given the building's age and original and current function. **All original and early sandstone and brickwork should be retained and appropriately conserved. No new openings or alterations should be made to the walls.** Where possible the openings in the sandstone walls created in the 1970s should be blocked up to allow interpretation of the way in which the Stores originally functioned.

We concur with the comments made by the Heritage Council of NSW submission letter (dated 10th February 2015) which states that: "The new doorways in Bays 3, 6 and 9 of the west façade propose the removal of significant fabric and addition of new contemporary awnings in three locations that would diminish the architectural character of the west façade from Hickson Road to an unacceptable level" (Item No. 1).

4. Internal alterations including forming new openings, introduction of new voids and closing over of existing openings, introduction of a new lift and stairs.

Comments

Our previous objection to the proposed internal works still stands as the details in relation to these works do not acknowledge the existing voids and stairs already located within the building. Based on the significance diagrams provided within the CMP for the place (GML, 2014, pgs. 138-139) a number of openings in the floors already exist within Bays 2, 3, 5, 7, 8 and 10. The proposal does not address these existing voids or provide for their reuse. Instead the proposal involves the introduction of a series of new openings in the floors and it is assumed that the existing voids are to be closed over. Again the opportunity to restore, reconstruct and/or interpret the original internal spaces has not been adopted within this proposal and this is considered an inappropriate approach to the ongoing conservation of the place.

As the original internal spaces and original internal fabric are ranked as being of 'Exceptional' significance, introducing new openings and voids into the building has the potential to negatively impact on the significance of the place through the further loss of significant original fabric, by

confusing or obscuring the original/early internal configurations of the warehouse spaces and via the introduction of unsympathetic materials and elements.

Conclusion

Based on our analysis of the proposal, it is considered that the proposed remediation, renewal and adaptation works to Campbell's Stores are incompatible with the heritage values and level of significance of the place and its setting.

Campbell's Stores is a former maritime industrial building (warehouse) that is considered as being of 'Exceptional' significance and is a rare, surviving example of mid-nineteenth century warehousing in Sydney and the **only one of its type remaining on the foreshores of Sydney Cove**. As such, the careful and sympathetic treatment of the building's surviving original fabric (internal and external) should be a primary consideration for any new works to the place. Opportunities should be sought for the restoration and reconstruction of missing elements and the interpretation of the original details and functions of the building.

In addition, the Stores building is situated in a locality with a strong 19th century industrial character, being surrounded by the Metcalf Stores, the ANSC Building and the former Mining Museum (Australia Council building). Together this group of buildings clearly relate to Sydney's maritime past and the locality has significant historic links with the colonial development of the city of Sydney. As such, development within and adjacent to Campbell Cove should account for the historic character of the place and ensure that any new structures are subservient to and do not visually detract from the surrounding heritage items.

We acknowledge that some minor adjustments have been made to the overall proposal for Campbell's Stores, notably the deletion of the canopies from the Hickson Road frontage and the minor reduction to the overall height of the 'Bay 12 building'. However, our objections to the non-compliance with conservation policies as contained within the CMP for the place and to the unjustified and seemingly unnecessary loss of significant fabric of the Stores building, in the main, still stand.

Yours faithfully,



Kate Denny
Clive Lucas, Stapleton & Partners Pty. Ltd.
Architects and Heritage Consultants