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Ben Lusher
Director
Key Sites Assessments
Department of Planning and Environment
GPO Box 39 Sydney NSW 2001

Dear Ben,

MODIFICATION TO CAMPBELL'S STORES, THE ROCKS (SSD 7056 MOD 2) – RESPONSE TO SUBMISSIONS

1. INTRODUCTION

We write on behalf of *Tallawoladah Pty Ltd* (the Proponent) regarding the proposed Modification to SSD 7056, which seeks consent for a number of minor amendments to the approved Architectural Drawings in order to facilitate a more efficient and effective design solution. These minor amendments include:

- Bay 11 plantroom layout and roof openings revised to match new mechanical design;
- New powder-coated louver wall added to the loading dock;
- Bay 6 Ground Level toilet layout updated;
- New air vent within the eastern eave of Bay 6; and
- New internal horizontal penetration at Level 1 Bay 8-9.

The application was publicly exhibited between 17 May 2018 and 30 May 2018. A total of 7 submissions were received during the formal exhibition period from state and local government agencies, including:

- *City of Sydney Council*;
- *Department of Industry*;
- *NSW Environment Protection Authority*;
- *Heritage Council of New South Wales*;
- *NSW Office of Environment and Heritage*;
- *Port Authority of New South Wales*; and

- *Transport for NSW.*

A total of 6 public submissions were received from the residents of 8 Hickson Road, including one late submission.

Correspondence was received on 4 June 2018 from the *NSW Department of Planning and Environment* requesting that the proponent provide a written response to the submissions received. The project team have reviewed the submissions received to date and have provided a response to each of the matters raised in the following sections.

This response to submissions should be read in conjunction with the following supporting documentation appended to this letter:

- Visual Impact Assessment, prepared by Virtual Ideas (**Attachment A**);
- Detailed Design Drawings, prepared by JPW and OCP Architects (**Attachment B**);
- Architectural Design Response, prepared by JPW (**Attachment C**);
- Heritage Response, prepared by GBA Heritage (**Attachment D**); and
- Mechanical Ventilation Response, prepared by Northrop Consulting Engineers (**Attachment E**).

2. RESPONSE TO PUBLIC SUBMISSIONS

The public submissions received from the residents of 8 Hickson Road raise concerns regarding the size of the roof openings and proposed screening / treatment, and the consequent impact on the visual appearance of the Bay 11 roof when viewed from the 6 apartments.

In order to address the concerns raised, the project team have provided further justification regarding the need for the roof openings and proportion of open vs. closed area, the screening / treatment options tested, and the visual impact of the proposal from 8 Hickson Road.

Visual Impact

A Visual Impact Assessment has been prepared by Virtual Ideas and is included at **Attachment A**. In order to assess the impact of the proposal on existing views from the residential properties at 8 Hickson Road the assessment provides photos and photomontages of the existing, approved (under SSD 7056) and modified Bay 11 roof when viewed from Units 1, 2, 3, and 4.

The assessment demonstrates:

- The 6 apartments within 8 Hickson Road currently enjoy 180 degree panoramic views of Sydney Harbour, Campbells Cove, the Opera House, and the Sydney Harbour Bridge. The proposed modification to the Bay 11 roof will have no impact on these existing significant views.
- The floor level of Units 4, 5 and 6 sit well above the height of the Bay 11 roof, meaning the Bay 11 roof can only be viewed from these apartments when standing at the glazing line and looking down.
- No part of the Bay 11 plant, mechanical ventilation system, exhaust or ductwork projects above the existing roof line. Therefore, there is no impact on the existing views from 8 Hickson Road.

- The proposed modification will alter the visual appearance of the Bay 11 roof when viewed from 8 Hickson Road. The proposal is considered to have a positive impact on the visual appearance of the Bay 11 roof when compared to the approved arrangement, particularly when viewed from 8 Hickson Road. Specifically:
 - The roof openings will be less evident visually than the openings previously approved due to the use of a fine mesh covering, the colour of which is to match the roof sheeting.
 - The equipment and roof structures within the Bay 11 roof space will also be less evident visually than the previously approved arrangement, as they are to be painted a recessive colour to match the roof sheeting.

Mechanical Engineering Requirements

Northrop Consulting Engineers have provided further information regarding the need for the proposed roof openings, the proportion of open vs. closed area, and the screening / treatment options tested (refer **Attachment E**). In summary:

- Campbell's Stores has insufficient electricity to operate conventional reverse cycle air conditioners.
- A gas powered air conditioning unit was chosen to eliminate the need for electrical infrastructure upgrade (installing a sub-station) on site.
- Natural gas as an alternative energy power source produces significantly lower amounts of harmful emissions, and reduces the operating cost by 1/10th.
- To accommodate the proposed gas powered system the Bay 11 roof openings for the air intake had to be increased to 25m². This is because the gas powered system requires 2.5 times more ventilation when compared to a conventional electrical system.
- The gas powered system is typically designed for outdoor application with only 30Pa external static pressure on the exhaust fan. On indoor installation within a plantroom (such as in Bay 11 plantroom), the air intake and exhaust louvre has to cater for the pressure drop. Bird mesh with over 70% free area is the only product that could satisfy the static pressure requirements.
- The only product that could satisfy the static pressure requirements of the gas powered system and mechanical engineer was a fine mesh with a minimum 70% free area.

JPW Architects have provided further information regarding the proposed modification, including the design development process undertaken, the brief provided by the client, and the mechanical, heritage, aesthetic, and operational requirements considered (refer **Attachment C**). In summary:

- The proposed Bay 11 roof modifications have been derived following a considered process involving PMNSW Heritage, the Client management team, planner and specialist mechanical engineer and heritage architect.
- A range of options have been considered and tested as part of the design process for the roof material to address the project design requirements.
- The proposed modification retains the existing roof form and structure consistent with the heritage requirements for the building.

- Working together with PMNSW Heritage and the wider project team, we have sought to rationalise the roof openings and moderate the visual impact with a screening mesh.
- Openings are maximised as much as possible to the non-visible southern elevation and the (less-visible) southern roof. The openings on the northern side of the roof are rationalised into 3 openings between the existing trusses. The southern roof openings are aligned to these for consistency across the roof.
- Plant equipment is contained within the existing roof form, and painted-out mid-grey to match the metal roof colour. The mechanical equipment is arranged between existing trusses.
- Three material types were tested, including welded mesh, expanded mesh and louvers/grills. The only viable option that satisfies the static pressure performance requirements of the mechanical engineer is 'TYPE A' the 'Boston 705' mesh. This specific mesh has been selected over other types of mesh as it has a thick gauge wire and sectional profile that provides effective visual screening, whilst still achieving 70% free area. Other meshes with slimmer gauge wires and suitable free-area were examined and rejected, as they could not achieve effective visual screening. The mesh is detailed so that it will sit flush to the corrugated metal roof sheet.
- The finish of the material is to be powder-coated to blend with the metal roof sheet. All flashings and trims to the openings and cladding over the timber purlins will blend and match with the metal roof.

Heritage Impact

GBA Heritage have confirmed the proposal is acceptable with regards to heritage and is consistent with the Conservation Management Policies (refer **Attachment D**). With regard to the size of openings, proposed screening material and associated visual impact the assessment confirms:

- Although the modification proposes an increase in the area of the roof opening sizes, this is the preferred option rather than an alternative placement of the plant elsewhere in the building.
- The proposal is an improvement on the currently approved openings, which have no mesh covering and would be more obvious.
- The use of mesh would be less visually evident than a louvre system, which would more likely draw attention to the openings as it would cast striped light/dark shadows across the roof openings. A mesh provides a more even surface without visual 'indentations'. The use of a louvre system would also give a more obvious appearance of 'mechanical plant' than a 'neutral' mesh.
- The mechanical plant is contained entirely within the Bay 11 roof form, and does not protrude above the plane of the roof.
- The physical and visual setting of the Campbell's Stores is retained (Policy 13).
- The necessary upgrade of the mechanical services as proposed, will not have a detrimental impact on the heritage significance of the building (Policy 19).
- The location and methodology of the mechanical plant in Bay 11 is discrete and does not adversely impact on the roofscape of the building (Policy 20).

- The mechanical and architectural design analysis of the proposal represents the least impact on the significant fabric and visual presentation of the building (Policy 29).
- The location of the proposal in Bay 11 is in an area of lesser significance than the other bays, and involves an approved replacement metal roofing material.
- Given the intention to enable a sustainable use of the Campbell's Stores building with a workable mechanical system, the increased size of the covered openings relative to the alternatives, provides mitigation in heritage terms.

Summary

Contrary to the views represented in the public submissions received, the amended Bay 11 plant room and roof structure has been carefully designed to mitigate the potential for adverse impacts on the surrounding area, particularly with regards to heritage, visual impact, and noise, whilst allowing for a more efficient engineering solution that will significantly improve the sustainability and longevity of Campbell's Stores for years to come. As detailed above and within the attached supporting documentation the proposal will have a positive impact on the visual appearance of the Bay 11 roof, particularly when viewed from 8 Hickson Road.

3. RESPONSE TO AGENCY SUBMISSIONS

A review of the agency submissions has been undertaken and a detailed response to the issues is provided in Table 1.

Table 1 – Response to Submissions – Modification 2 to SSD 7056

Submission	Response
NSW Department of Planning and Environment	
<u>Visual impact</u> <i>Provide a visual impact assessment of the existing, approved and proposed development from 8 Hickson Road. This is to show the internal plant equipment and how this will be viewed through the mesh material.</i>	A Visual Impact Assessment has been prepared by Virtual Ideas and is included at Attachment A. The photomontages provide a representation of the existing, approved, and proposed views of the Bay 11 roof when seen from 8 Hickson Road. The VIA demonstrates that the proposed modification will not have a negative impact on the existing significant views from 8 Hickson Road to Sydney Harbour, the Opera House, and the Harbour Bridge. Further, the proposal will have a positive impact on the visual appearance of the Bay 11 roof when compared to the approved arrangement, particularly when viewed from 8 Hickson Road.

Submission	Response
<u>Mechanical Ventilation</u> <i>Provide detailed design drawings for all mechanical ventilation equipment and odour control devices. The equipment is not to protrude above any part of the roof and adhere to the Construction* Management Plan.</i> *Note: This should be Conservation Management Plan.	Detailed design drawings have been prepared by JPW and OCP Architects and are included at Attachment B. The drawings demonstrate that no part of the mechanical ventilation equipment or odour control devices will protrude above any part of the roof. A Heritage Response has been prepared by GBA Heritage and is included at Attachment D. The response confirms that the proposal adheres to the Conservation Management Plan.
City of Sydney Council	
<i>The City has reviewed the modification and is generally <u>supportive</u> of the proposed amendments subject to the following comments made for your consideration:</i> <i>The change from an electrical generated mechanical system to a gas fire system, will result in larger roof openings in Bay 11, but this will be mitigated by the installation of a fine mesh over them, the colour of which will match adjoining roof. As demonstrated in the visual impact assessment, these changes will have a minor but acceptable visual impact, and with the use of a mesh covering, the roof openings will be less evident visually than the openings previously approved. The roof cladding is not original fabric.</i> <i>The other changes are considered to be minor and will have little heritage impact.</i>	Noted. No response required.
Department of Industry	
<i>The department has reviewed the Environmental Assessment and has no comments or objections in relation to the proposed modification.</i>	Noted. No response required.

Submission	Response
NSW Environment Protection Authority	
<i>The EPA does not consider that the proposal will require an Environment Protection Licence (EPL) under the POEO Act. The EPA understands that the proposal is not being undertaken by or on behalf of a public authority. The EPA maintains that it is not the appropriate regulatory authority for the proposal and has no further interest in this proposal.</i>	Noted. No response required.
Heritage Council of New South Wales	
<i>Following a review of the documentation, it is considered that most of proposed modifications will not substantially alter the design, and would not result in any further impact on the heritage values of the site.</i> <i>However, the modifications to provide additional openings and enlarge the approved roof openings in Bay 11, has the potential to have adverse visual impacts. It is understood that a mesh, coloured to match the roof sheeting, is proposed to cover the openings to minimise the visual impact. This is an <u>improvement</u> over the approved roof openings, which were un-covered. It is also noted that the significant structural roof elements will not be affected as a result of the proposed ventilation openings.</i> <i>To ensure the design of the mesh screening is not visually intrusive, it is recommended the following condition be included in any approval.</i> <i>Prior to the issue of the relevant Construction Certificate, the Applicant shall provide a detailed design of the proposed mesh screening including water proofing and framing & fixing, to ensure the elements are not intrusive physically or visually. This should be prepared to the satisfaction of the Heritage Council of NSW.</i>	Detailed design drawings have been prepared by JPW and OCP Architects and are included at Attachment B. The drawings demonstrate that the proposed mesh screening including water proofing, framing and fixing are not physically or visually intrusive. These detailed design drawings are submitted to DPE and the Heritage Council to avoid any potential delays post approval and prior to the issue of a Construction Certificate.

Submission	Response
<i>In addition, the architectural drawings EA-A-2000 & EA-A-3011 appear to highlight works to the eastern façade of Bay 11. However, these works have not been listed within the proposed scope of works and have not been assessed within the Statement of Heritage Impact. As it is unclear what is proposed, it is recommended that works to the eastern façade of Bay 11 are not approved at this stage.</i>	The Modification proposes to replace the existing dilapidated louvres and FC panel on the eastern elevation of Bay 11 with new alluvium louvres, powder-coated charcoal. The louvre is required to facilitate natural ventilation of the Bay 11 roof, whilst also protecting the building and brickwork from rain. The louvre design is consistent with the existing louvres found on the Hickson Road façade. The louvre replacement has been assessed by GBA Heritage (refer Attachment D). The assessment confirms the proposed replacement of the Bay 11, east Dutch gable front face with a new louvre will have an <u>acceptable heritage impact</u>. Specifically, the assessment states: • <i>Originally the Bay 11 roof was hipped, but altered to a Dutch gable, possibly after WWI.</i> • <i>The CMP Policy 8 guideline indicates that the Dutch gable can be altered to a hip if considered appropriate.</i> • <i>The Dutch gable has an existing flat sheet panel with what appears to be a later metal louvre.</i> • <i>The proposal is not to alter the form of the gable or barge boards, but to only replace the front face panel and louvre with a charcoal coloured aluminium louvre, thus improving air flow to the plant room.</i> • <i>The proposed modification of the gable front to a full louvre system, is therefore acceptable in heritage terms and a visual improvement.</i> Therefore, it is requested that the Department provide approval for these works, as detailed on the Architectural Drawings submitted with the application.

Submission	Response
NSW Office of Environment and Heritage	
After reviewing the relevant documents, OEH's Greater Sydney Planning Team has concluded that the matter does not contain biodiversity, natural hazards or Aboriginal Cultural Heritage issues that require a formal OEH response. We have no further need to be involved in the assessment of this project.	Noted. No response required.
Port Authority of New South Wales	
I reviewed Modification 2 and the Port Authority will not be making a submission.	Noted. No response required.
Transport for NSW.	
TfNSW has reviewed the above modification proposal and advises that it has no further comment on the above development application.	Noted. No response required.

4. CONCLUSION

We trust this letter provides an adequate response to the submissions received regarding the proposed Modification to SSD 7056. Please do not hesitate to contact me on 02 8233 7621 should you require anything further.

Yours sincerely,



Samantha Wilson
Associate Director – Urban Planning