

14 August 2015

The General Manager
City of Sydney Council
GPO Box 1591
SYDNEY NSW 2001



**GRAHAM BROOKS
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Dear Sir/Madam

**Statement of Heritage Impact
Proposed New Through Site Link
Grosvenor Place
225 George Street, Sydney
(SSD 7163)**

This Statement of Heritage Impact has been prepared to accompany a State Significant development application for proposed alterations and additions to Grosvenor Place, 225 George Street, Sydney, to establish an alternative Through Site Link.

The report evaluates the proposed development, designed by Harry Seidler & Associates, and illustrated in drawings DA-4 100-109. It also responds to the relevant *Secretary's Environmental Assessment Requirements* (SEARS) for State Significant Development (SSD) 7163.

Report Objectives

The main objective of this Statement of Heritage Impact is to determine the suitability of the design and the heritage impact of the proposal in relation to the provisions established by the City of Sydney Council, the New South Wales Heritage Office (now the Heritage Division of the NSW Office of Environment and Heritage) guidelines, and in accordance with the relevant SEARS.

Methodology and Structure

This Statement of Heritage Impact has been prepared in accordance with guidelines outlined in the *Australia ICOMOS Charter for Places of Cultural Significance*, 2013, known as *The Burra Charter*, and the New South Wales Heritage Office (now the Heritage Division of the NSW Office of Environment and Heritage) publication, *NSW Heritage Manual*.

The Burra Charter provides definitions for terms used in heritage conservation and proposes conservation processes and principles for the conservation of an item. The terminology used, particularly the words *place*, *cultural significance*, *fabric*, and *conservation*, is as defined in Article 1 of *The Burra Charter*. The *NSW Heritage Manual* explains and promotes the standardisation of heritage investigation, assessment and management practices in NSW.

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Site Identification

The subject site is located on the west side of George Street, and is bounded by Essex Street to the north and Harrington Street to the west (Figure 1). It is described by NSW Land and Property Information (LPI) as Part Lot 1, DP 771884.

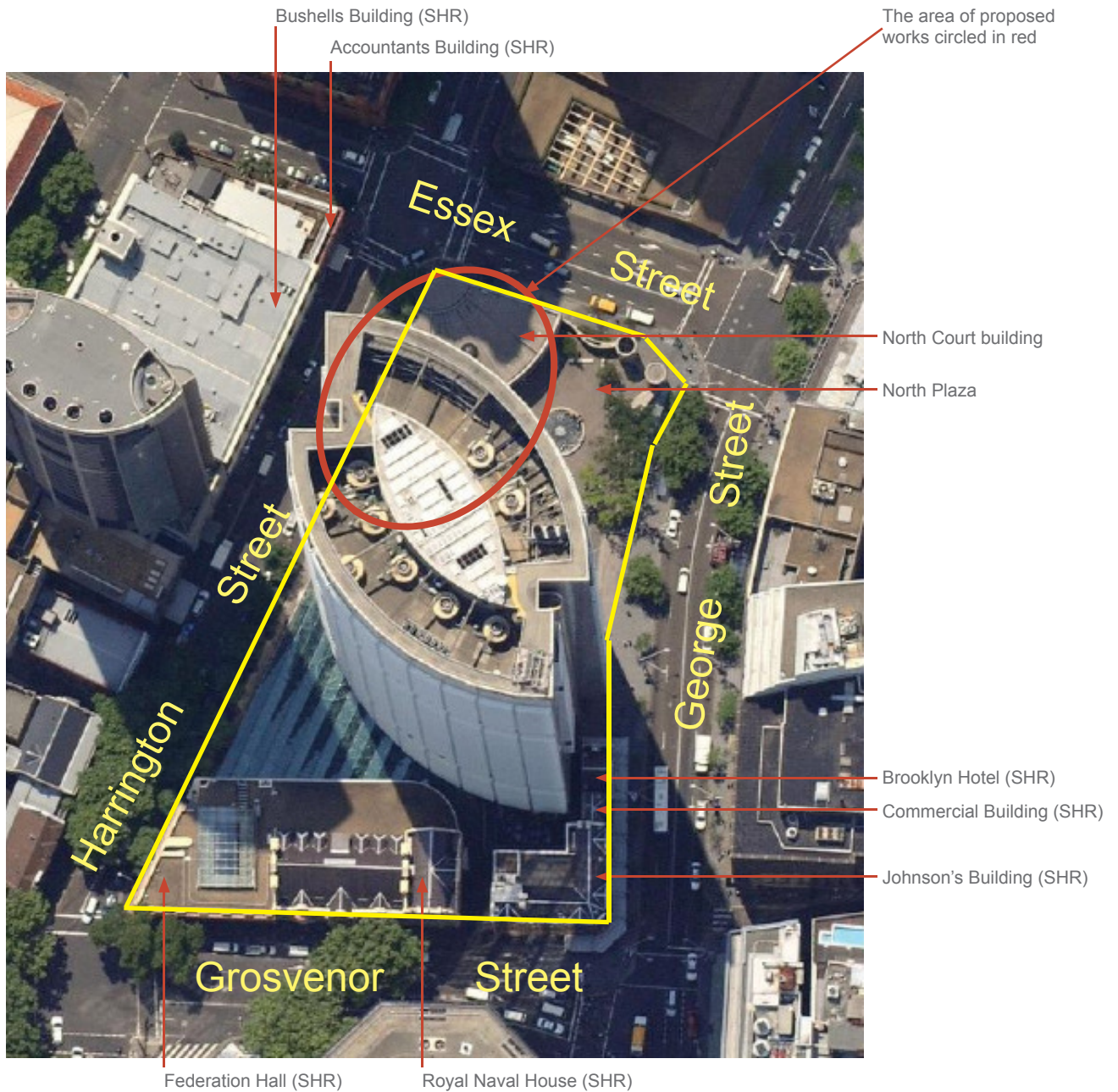


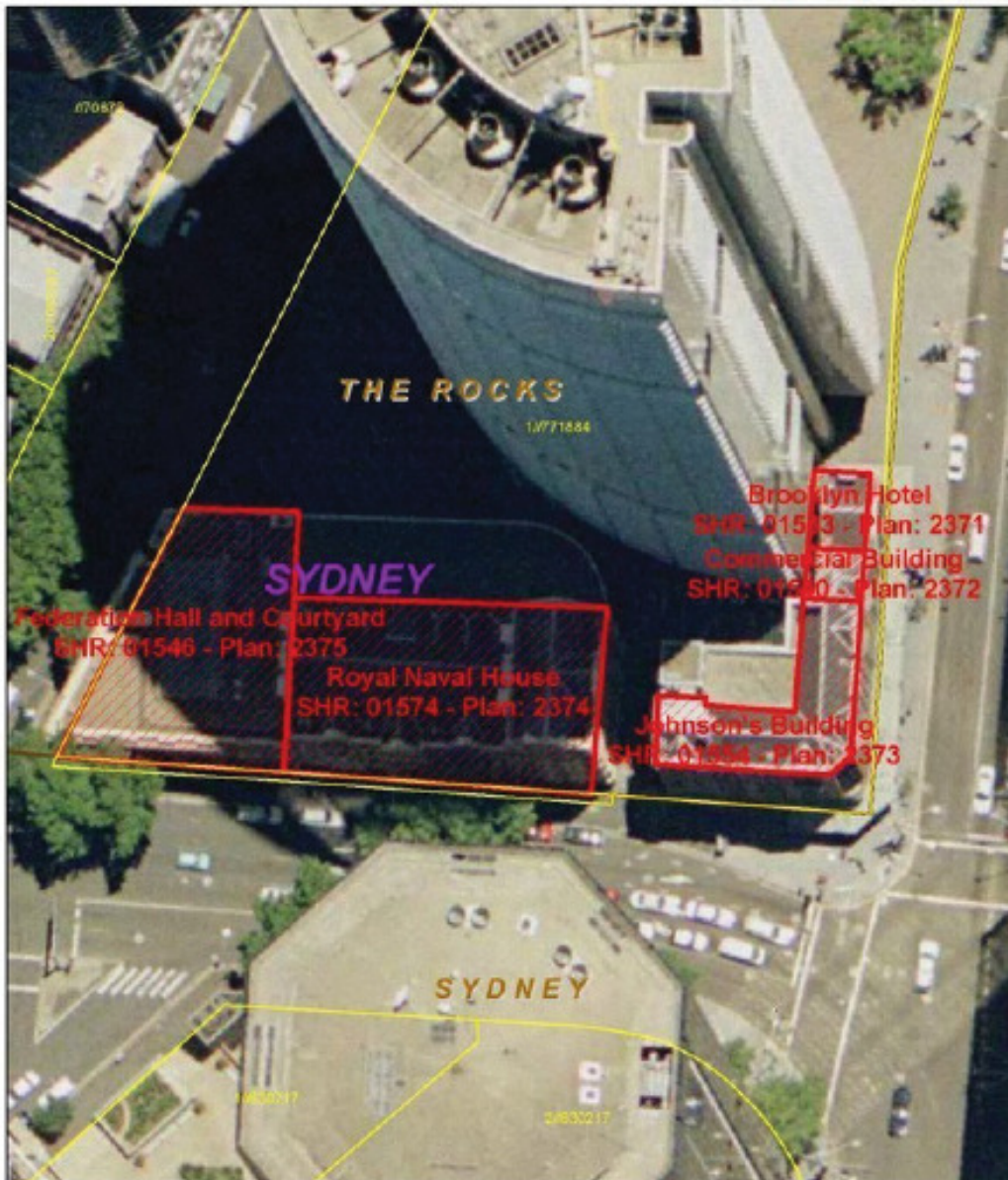
Figure 1: Aerial photograph showing the subject site, outlined with a yellow line, and the area of proposed works circled in red. The State Heritage Register listed items are noted
Source: Nearmap

Heritage Management Framework

The subject site at 225 George Street, owned by the Sydney Harbour Foreshore Authority (SHFA), is a parcel of land that contains State Heritage Register (SHR) listed items, however the Grosvenor Place tower and plaza areas have been excluded from the SHR listing curtilage (Figure 2). The property is not subject to the heritage provisions of the *Sydney Local Environment Plan 2012*, although the City of Sydney is the consent authority for development under the *Environmental Planning and Assessment*

Act 1979. The subject site is within the *The Rocks Conservation Area* as listed under the SHFA s.170 agency register. City of Sydney Council, as the consent authority, must take into consideration the potential impact of any proposed development on the heritage significance of the conservation area and the heritage items in the vicinity of the subject site.

The project has been referred to the Department of Planning & Environment as it relocates the pedestrian route, from the corner of Harrington and Essex Streets through the subject site, identified in the Sydney Cove Redevelopment Authority (SCRA) Scheme, and a variation to the scheme is required under the EPA Regulation.



State Heritage Register

Gazettal Date: 10 May 20002

0 2.5 5 10 15 20
Metres

Scale: 1:560

Produced by: Hongwei Lu

Legend

- SHR Curtilage
- Land Parcels
- LGAs
- Suburbs

Figure 2: State Heritage Register Curtilage inventory listing sheet for the items within the 225 George Street parcel of land, Part Lot 1 DP 771884. Note Royal Naval House and Federation Hall face Grosvenor Street

Report Limitations

This report is limited to the analysis of the European significance of the site. Recommendations have been made on the basis of documentary evidence viewed and inspection of the existing fabric. Archaeological assessment of the subject site is outside the scope of this report.

This report only addresses the relevant heritage planning provisions and does not address general planning or environmental management considerations.

Site Description and Context

The site of the proposed works is located at the north end of the Grosvenor Place property, bounded by George, Essex and Harrington Streets (Figures 1 & 5). Essex Street falls from east to west, with a significant drop in the topography from Harrington Street down to George Street. The site forms a part of the forecourt to the Grosvenor Place tower and currently is an open plaza (Figure 6). The North Court building, which contains a restaurant and amenities, lines the north-west corner of Essex and Harrington Streets (Figure 4), and currently provides access with an escalator, from Harrington Street to the lower forecourt of Grosvenor Place. This is the current through site link identified under the SCRA scheme.

To the east of the subject site, George Street is lined with commercial high rise buildings, and to the north is a high rise hotel. The west side of Harrington Street is lined with late 19th and early 20th century buildings, five and seven storeys high (Figure 4).



Figure 3: Corner of Grosvenor and Harrington Streets with Federation House on the right. The proposed works are beyond Federation House at the junction of Grosvenor Place tower and the Harrington Street alignment



Figure 4: The *Accountants House* and *Bushells Building* in Harrington Street on the right, with the North Court building of the subject site on the left. Note the entrance to the subject site at this point, where the escalators are located down to the forecourt



Figure 5: From Harrington Street with the lift drum on the left, the stairs beyond and glazed roof on the right



Figure 6: From the forecourt with the North Court building and an existing glazed canopy on the left

Established Significance of the Subject Site

The parcel of land at 225 George Street, Part Lot 1, DP 771884, includes the subject forecourt plaza, the tower building and State Heritage Register listed items at the southern end of the site, fronting George, Grosvenor and Harrington Streets (Figure 3). The following table lists the SHR items within the parcel of land of the site (Figure 2):

Heritage Item	Street Address	State Heritage Inventory No
Brooklyn Hotel	229 George Street	01533
Commercial Building	231 George Street	01540
Johnson's Building	233-235 George Street	01554
Royal Naval House	32-34 Grosvenor Street	01574
Federation Hall and courtyard	24-30 Grosvenor Street	01546

Established Significance of The Rocks Conservation Area

The subject site at 225 George Street, The Rocks is located within the boundaries of *The Rocks Conservation Area* which is listed as an item of heritage significance on the s.170 NSW State heritage agency register of the Sydney Harbour Foreshore Authority.

The NSW Heritage Inventory contains the following information for *The Rocks Conservation Area*.

Statement of Significance:

The Rocks, with its complex layering of significant fabric, uses and associations, is a precinct of national cultural significance. The Rocks is valued as a place of major social history, reflecting more than two centuries of significant activity; including European invasion, early contact between Aboriginal people and European settlers, and colonial settlement. The drama of cross-cultural encounters reflects The Rocks' focal location as a place linking continental, colonial, city and maritime histories. The Rocks was saved through fierce battles for its conservation, and by government ownership. Despite ongoing incremental change in The Rocks, continuity and authenticity remain major themes, manifest in increasingly rare and fragile relics of original topography and built fabric, remnants of history and a living community.

The SHR listed items that occupy the southern end of the site form an important southern marker to the conservation area. Together with the buildings further west that line the north side of Grosvenor Street, they represent a significant streetscape reflecting the early history of the colony and the Lang Park precinct.

Established Significance of the Heritage Items in the Vicinity of the Subject Site

There are a number of individually listed heritage items in the vicinity of the subject site. These are listed as items of state heritage significance on the State Heritage Register (Figure 1):

Heritage Item	Street Address	State Heritage Inventory No
Accountants House	117-119 Harrington Street	01521
Bushells Building	121-127 Harrington Street	01534

The Development Proposal

The development application has been prepared by Harry Seidler & Associates. The proposal is detailed in the plans that accompany this application, and include drawings, DA-4, Plans and Elevations numbered 100-109, Issue A.

The scope of works for SSD 7163 can be summarised as alterations and additions to the base of the building which include the following (Figure 7):

- The removal of the escalators within the North Court building and infill within the tenancy space (fitout and use will be the subject of a separate approval)
- The creation of a 24 hour accessible Through Site Link from Harrington Street to George Street
- The installation of directional signage throughout the site
- Minor alterations and additions to the North Court building including stair and lift access, and removal of part of the existing glass awning within the courtyard
- The addition of a new glass canopy to the new Harrington Street entry as a part of the relocated Through Site Link (Figure 8).

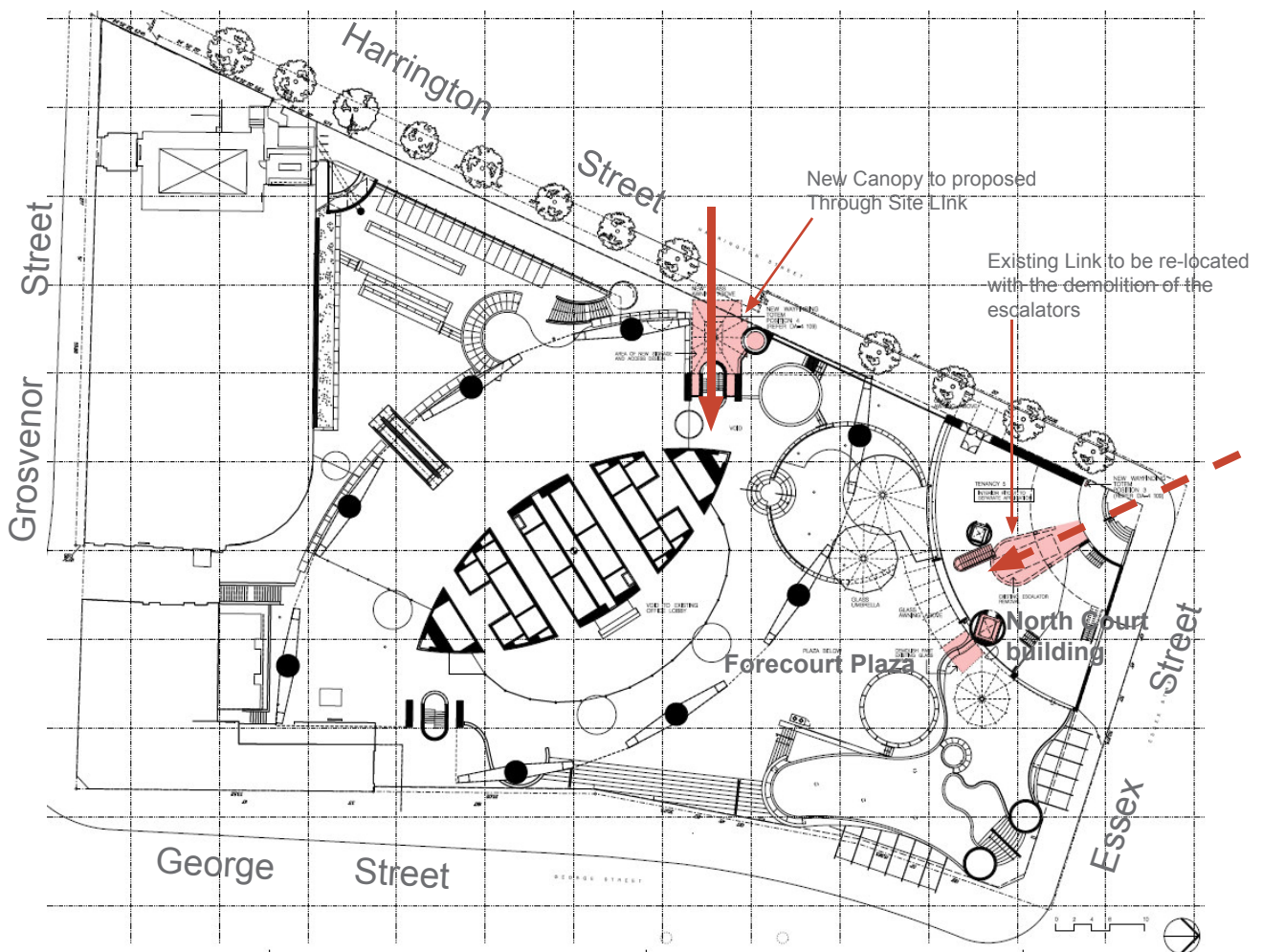


Figure 7: Floor plan at the Harrington Street level with the proposed alterations and additions shaded pink. Note the proposed canopy to provide weather protection to the existing lift and stairs, and the removal of the escalator from the North Court building

Source: Harry Seidler & Associates, part drawing DA-4, 104

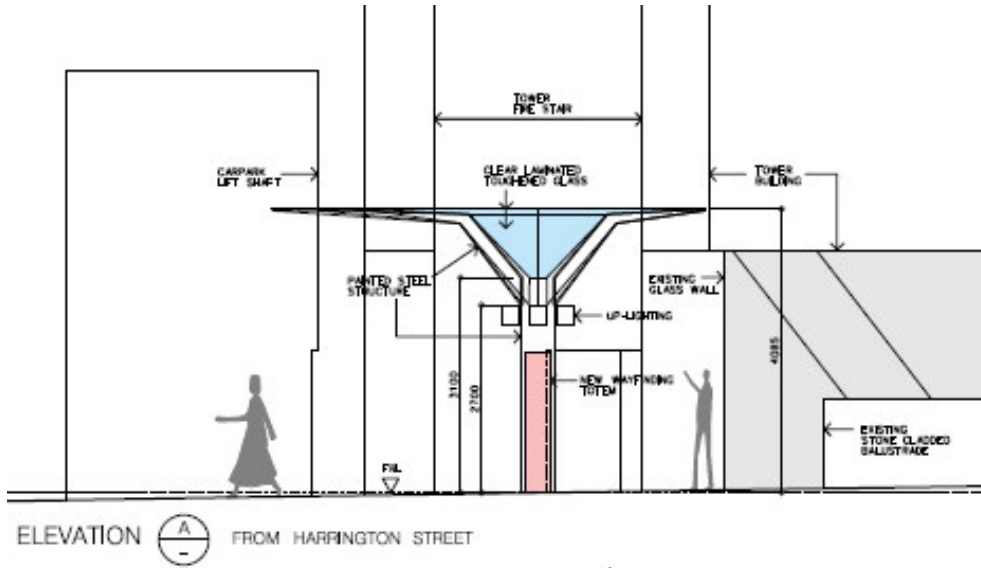


Figure 8: Harrington Street Elevation of the proposed glazed canopy in relation to the existing lift drum on the left, and the stair shaft behind

Source: Harry Seidler & Associates, part drawing DA-4, 107

Assessment of Heritage Impact

Overview of the Potential Heritage Impacts

Although 225 George Street is within a Conservation Area and in the vicinity of SHR listed items, the locations and nature of the proposal and its visual confinement to the site limits its heritage impact on the area. The only item that is likely to join the visual curtilage of nearby heritage items is the new glazed canopy in the centre of the Harrington Street frontage, however this is on the periphery of the curtilage.

Response to SEARS, Item 6 Heritage

The following Table summarises the applicable clause of the SEARS, *Item 6. Heritage*:

SEARS	Comment
<i>The EIS shall include a Heritage Impact Assessment for the proposed works, and is to include:</i>	This report, as a Statement of Heritage Impact, will be included in the EIS
<ul style="list-style-type: none"> <i>an assessment of any potential impacts of the proposal on all heritage items (state and local) in the vicinity of the site, including but not limited to Bushalls Building (SHR 01534), Accounts House (SHR 01521), the Brooklyn Hotel (SHR 01534), and any conservation areas</i> 	The <i>Bushalls Building</i> and <i>Accounts House</i> are on the opposite side of the street to the proposed glass canopy in Harrington Street, and there will be no adverse impact on their significance. The <i>Brooklyn Hotel</i> , <i>Federation Hall</i> and the buildings lining Grosvenor Street are not in the vicinity of the proposal
<ul style="list-style-type: none"> <i>an assessment of any aboriginal and non-aboriginal archaeological impacts</i> 	This report does not address archaeology as the proposal does not involve any excavation
<ul style="list-style-type: none"> <i>detail mitigation measures to offset any potential impacts on heritage values</i> 	There are no potential impacts on heritage values of the heritage items in the vicinity
<ul style="list-style-type: none"> <i>an assessment of the visual impacts of the proposal on the historic streetscapes of Harrington Street</i> 	The proposed glass canopy will not impact on the Harrington Street streetscape, and is consistent with the existing Grosvenor Place detailed design
<i>Consultation</i>	Consultation has been undertaken, to the required extent, by JBA Planning

Evaluation Against the Guidelines of the NSW Heritage Division

The NSW Heritage Office (now the Heritage Division of the NSW Office of Environment and Heritage) has published the following series of criteria for the assessment of heritage impact of new development in the vicinity of a heritage item. These are answered below in relation to the impact on the properties at the southern end of the site fronting Grosvenor Street and the corners of George and Harrington Streets, *The Rocks Conservation Area* and the heritage items in its vicinity at 117-119 and 121-127 Harrington Street.

The following aspects of the proposal respect or enhance the heritage significance of the items or conservation area for the following reasons:

- Retention of a Through Site Link from Harrington Street to George Street, albeit in a different location
- Retention of the building's street presentation along George, Essex and Harrington Streets, with the addition of a new glass canopy designed by the original architectural practice
- The low visibility of the proposed alterations.

Minor Additions

The following minor additions are proposed as part of this development:

- The addition of a new glass canopy to the new Harrington Street entry
- The installation of directional signage throughout the site.

The relevant 'questions to be answered' in the *NSW Heritage Manual* 'Statements of Heritage Impact' guidelines relating to minor additions are:

- *How is the impact of the addition on the heritage significance of the item to be minimised?*
- *Can the additional area be located within an existing structure? If no, why not?*
- *Will the additions tend to visually dominate the heritage item?*
- *Is the addition sited on any known, or potentially significant archaeological deposits? If so, have alternative positions for the additions been considered?*
- *Are the additions sympathetic to the heritage item? In what way (eg form, proportions, design)?*

Comment

The addition of a glazed canopy is located on the opposite side of the Harrington Street heritage items, and on the other side of the site from the Grosvenor Street heritage items. The proposed canopy additions are consistent in design to the existing Grosvenor Place area detailing. The directional signage will not have any impact on heritage items.

An archaeological assessment has not been made as part of this report.

New Development Adjacent to a Heritage Item

The subject site is in the vicinity of *Accountants House* and the *Bushells Building*. The relevant 'questions to be answered' in the *NSW Heritage Manual* 'Statements of Heritage Impact' guidelines relating to development adjacent to a heritage item are:

- *How is the impact of the new development on the heritage significance of the item or area to be minimised?*
- *Why is the new development required to be adjacent to a heritage item?*
- *How does the curtilage allowed around the heritage item contribute to the retention of its heritage significance?*
- *How does the new development affect views to, and from, the heritage item? What has been done to minimise negative effects?*
- *Is the development sited on any known, or potentially significant archaeological deposits? If so, have alternative sites been considered? Why were they rejected?*

- *Is the new development sympathetic to the heritage item? In what way (e.g. form, siting, proportions, design)?*
- *Will the additions visually dominate the heritage item? How has this been minimised?*
- *Will the public, and users of the item, still be able to view and appreciate its significance?*

Comment

The design of the proposed alterations and additions, including the glazed canopy, are consistent with the Grosvenor Place extant plaza area. The location of the proposed glazed canopy in Harrington Street is on the periphery of the visual curtilage of the SHR items opposite. As such, views in and around the heritage items will not be affected by the proposed development.

Evaluation Against Sydney Development Control Plan

Although the site is outside the area covered by the *Sydney DCP 2012*, we note that the proposed development is generally consistent with the guidelines of the *Sydney DCP 2012* that relate to development in conservation areas and that are adjacent to heritage items. In particular:

Under Clause 3.9.5 *Heritage Items*

(f) not reduce or obscure the heritage significance of the item

Comment

The minor nature and location of the proposed alterations and additions will not obscure the identified heritage items in the vicinity, as they are outside the visual sensitivity and curtilage of those items.

Evaluation Against The Rocks Heritage Management Plan (Volume 1), SHFA

The SHFA endorsed document for the management of the heritage significance of The Rocks is *The Rocks Heritage Management Plan*.

Under Clause 4.1.5 *Minimise Heritage Impacts* is the following:

Principle: Activities which have an adverse impact on the heritage value of The Rocks should be actively managed to avoid or minimise such impacts

Comment

The proposed alterations and additions at Grosvenor Place at 225 George Street will not impact on the heritage values of *The Rocks Conservation Area*, nor the listed SHR items in the vicinity, as they do not impact on their visual sensitivity or their curtilage.

Conclusions

- 225 George Street is located within *The Rocks Conservation Area* and is adjacent to the SHR listed heritage items at 117-119 and 121-127 Harrington Street, as well as the SHR items at the southern end of the subject property fronting Grosvenor Street.
- The alternative Through Site Link proposal retains a connection between Harrington Street and George Street, and is to operate for 24 hours, seven days a week.
- The proposed alterations and additions to 225 George Street are limited to within the boundary walls and structures of the existing development, other than the glazed canopy in Harrington Street.
- The proposed alterations and additions to 225 George Street will have no adverse impact on the heritage significance of the adjacent properties in Harrington Street, Grosvenor Street, or *The Rocks Conservation Area*.

- The proposed development is consistent with the heritage requirements and guidelines of *The Rocks Heritage Management Plan*.

Recommendation

Graham Brooks & Associates has no hesitation from a heritage perspective, in recommending this development application to Council for approval.

Yours faithfully
GRAHAM BROOKS AND ASSOCIATES PTY LTD

A handwritten signature in black ink, appearing to read 'Garry McDonald', written in a cursive style.

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