



**ANGEL PLACE**  
**LEVEL 8, 123 PITT STREET**  
**SYDNEY NSW 2000**

URBIS.COM.AU  
Urbis Pty Ltd  
ABN 50 105 256 228

05 April 2019

NSW Department of Planning and Environment  
Att: Karl Fetterplace

## 85 HARRINGTON STREET, THE ROCKS - RESPONSE TO SUBMISSIONS

The below responses and further information are provided in relation to the response to submissions received by the applicant from the NSW Department of Planning for the project *85 Harrington Street, 66-68 and 80-72 Harrington Street, The Rocks (SSD 7037 MOD 2)*.

The below sets out the comments provided by the NSW department of planning under Schedule 1, Heritage with responses or further information as required.

Comment received (NSW Department of planning)	Urbis response
<b>Heritage</b> <ul style="list-style-type: none"><li>Update the Heritage Impact Statement to reflect the latest drawings (Revision 6) and the comments received from the Heritage Division of the Office of Environment and Heritage.</li><li>Confirm all basement walls assigned a significance of high or exceptional are proposed to be retained as per Condition B2.</li></ul>	Please see attached revised heritage impact statement.  We confirm that all basement walls assigned significance of high or exceptional are proposed to be retained.

The below sets out the comments provided by the Delegate of the Heritage Council of NSW dated 10<sup>th</sup> of February 2019 reference DOC19/54708 and responses or further information.

Comment received (Delegate of the NSW Heritage Council)	Urbis response
<ul style="list-style-type: none"><li>Generally, the changes to Baker's Terrace are internal and retain more significant fabric than the original proposal. Whilst the changes to the floor level to the two front bedrooms of the northern terrace would have a minor impact on the spatial qualities of the rooms, the floating floor and step would be reversible and would not impact the significant heritage values of the terraces and is acceptable. The retention of fabric of high and exceptional significance in the basement addresses the condition previously recommended for the conservation of this fabric and is supported. The external presentation of the item would be conserved, ensuring the aesthetic values, views and contribution to the character of The Rocks would be retained.</li></ul>	Comment only  No response required

<ul style="list-style-type: none"> <li>• Division of significant spaces is not desirable. Ideally whole rooms/spaces should be used for providing amenities.</li> </ul>	<p>This has been carefully reviewed and assessed, especially considering the unusual configuration and amalgamation of these terraces as commercial spaces previously, in particular the basement. whole spaces are retained where possible whilst still providing residential accommodation.</p>
<ul style="list-style-type: none"> <li>• The works to proposed Blocks 1 and 2 would not generate any further negative heritage impact than the original proposal.</li> </ul>	<p>Comment only</p> <p>No response required</p>
<ul style="list-style-type: none"> <li>• The proposed landscape works between Baker's Terrace and Block 2 are supported as a modern, sculptural interpretation of the topography of The Rocks, with the differentiation in paving adjacent to Block 2 interpreting Cambridge Street. Consideration should be given to how this interpretation is conveyed to users as part of the interpretation strategy.</li> </ul> <p>Being low in height the sculpture would not block important views to Baker's Terrace, or impact significant fabric or other important values and is acceptable. The retention of the Harrington Street ridge bedrock is a positive conservation action that is supported.</p>	<p>Comment noted.</p> <p>Consideration will be given as part of the interpretation plan.</p>
<ul style="list-style-type: none"> <li>• The subject modification does not address the potential archaeological impacts of the proposal. Comments at various stages of the assessment of the previous proposal highlighted this issue. An archaeological assessment is required to be considered and approved prior to the commencement of works. The recommended approach is reiterated:             <ul style="list-style-type: none"> <li>◦ Where the archaeological assessment identifies that, there are likely to be archaeological resources of local or state significance requiring management, the applicant shall submit an Archaeological Research Design and Excavation Methodology undertaken by a suitably qualified and experienced historical archaeologist;</li> <li>◦ The name of a nominated excavation director suitable to satisfy the Excavation Director Criteria of the Heritage Council of NSW for the proposed activity and significance level;</li> <li>◦ The Research Design and Excavation Methodology should clearly state the provision of a final excavation report prepared by the approved Excavation Director is prepared and submitted in accordance with Heritage Council of NSW guidelines within 12 months of the completion of the archaeological activity; and</li> <li>◦ If historical archaeological deposits are discovered unexpectedly during works, work must immediately cease in the affected area(s) and a suitably qualified and experienced archaeologist must be contacted to assess the finds. Additional assessment and approval may be required prior to works continuing in the affected area(s) based on the nature of the discovery.</li> </ul> </li> </ul>	<p>The raised points are addressed in the Archaeological Assessment and Research Design and Methodology prepared by AMAC Group and Excavation Director Martin Carney dated 7th March 2019 . The document includes an Archaeological Assessment, Statement of Heritage Impact and Research Design and Methodology as well as Mr Carney's CV</p> <p>This document was sent to</p>

	the NSW Heritage Division on the 7th of March.
<ul style="list-style-type: none"> <li>Some conditions recommended for the previous scheme are still relevant and are reiterated below: <ul style="list-style-type: none"> <li>All the proposed wet-areas within the Bakers Terraces must be designed and installed in a manner that is reversible and does not impact original or significant fabric. This may be achieved by installing wet-area capsules inside significant rooms, to allow all services and fixtures to be independent of significant fabric.</li> <li>Submit to the Department of Planning and Environment for assessment and approval the Interpretation Plan, including implementation details in accordance with the report entitled <i>Interpretation Strategy, 85 Harrington Street, The Rocks</i>, prepared by Urbis Pty Ltd dated January 2016.</li> </ul> </li> </ul>	<p>Proposed wet area detailing is being undertaken in accordance with this requirement.</p> <p>Interpretation plan will be prepared and submitted.</p>

We trust the above satisfies the queries and comments received in relation to this project.

Yours sincerely,



Kate Paterson  
**Director Heritage**

Attached: Revised Heritage Impact statement dated 14<sup>th</sup> March 2019.



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23<sup>rd</sup> November 2018 – *revision A 14<sup>th</sup> March 2018*

Andrew Melhem  
Development Manager  
Time and Place

Dear Andrew,

## **ADDENDUM TO HERITAGE IMPACT STATEMENT: 85 HARRINGTON STREET, THE ROCKS, NOVEMBER 2018**

### **EXECUTIVE SUMMARY**

*This heritage impact statement has been revised to update the issue revision of drawings by the architects FJMT from revision A5 to A6. We confirm that the drawings and assessment have been reviewed and updated. The revised drawings content/design have not changed from the previous issue and therefore the heritage impact assessment has also remain unchanged. Revisions in this HIS are in red italics for ease of identification.*

This letter is provided as an addendum to the original Heritage Impact Statement (HIS) prepared by Urbis in January 2016 for the State Significant redevelopment of the above-mentioned site. This letter addressed proposed amendments to the current approved scheme.

The subject site contains the State Heritage Listed Bakers Terraces, which are separately listed as two buildings on the State Heritage Register as 66-68 Gloucester Street (SHR item 1530) and 70-72 Gloucester Street (SHR item 1531).

The current approved State Significant Development (SSDA) allows for the redevelopment the entire site including demolition of the existing c1988-90 building at 85 Harrington Street (formerly known as Harrington Court); and construction of two new buildings (Block 1 and Block 2) fronting both Gloucester Street and Harrington Street, comprising of high end luxury residential apartments, retail spaces and basement carparking.

Bakers Terraces are proposed to be incorporated into the overall redevelopment of the site, including re-design of the existing courtyard at the rear of the terrace.

Urbis has previously provided (as part of the original lodgement and as per detailed Secretary's Environmental Assessment Requirements (SEARS) the following documentation listed below:

- Conservation Management Plan for Bakers Terraces (dated 16/1/2016);
- Heritage Impact Statement (dated 16/1/2016); and
- Heritage Interpretation Strategy (dated 27/1/2016).

This HIS is an addendum to assess proposed amendments under the modification.

Addendum to Heritage Impact Statement (HIS), 85 Harrington Street, The Rocks.





## LOCATION AND SITE DESCRIPTION

The subject site is comprised of one large allotment located between Gloucester Street and Harrington Street, The Rocks, being Lot 1 DP 777033 (Figure 1) below.

Figure 1 – The subject site located at 85 Harrington Street, The Rocks (Bakers Terrace shown dashed in blue).



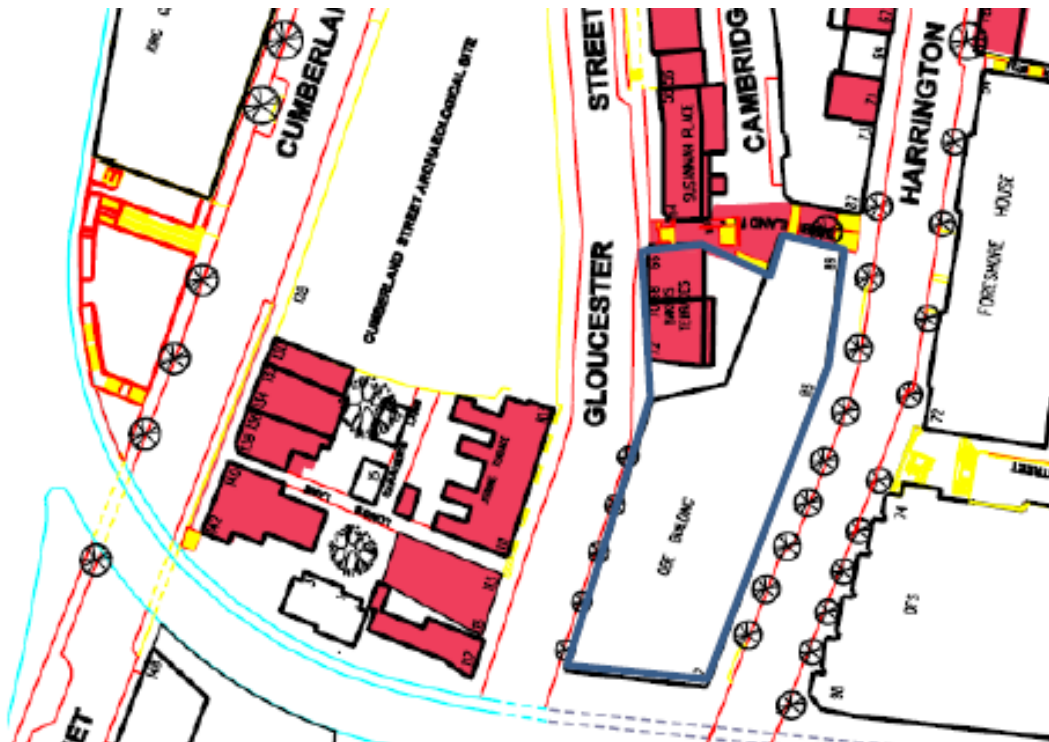
Source: Six Maps with Urbis overlay.

## HERITAGE LISTING

The following heritage listings apply to the site:

- The buildings comprising Bakers Terrace are separately listed as two buildings on the State Heritage Register as 66-68 Gloucester Street (item 1530) and 70-72 Gloucester Street (item 1531).
- In addition, they are separately listed as two buildings on the Sydney Harbour Foreshore Authority S170 Register as 66-68 Gloucester Street (item 4500100) and 70-72 Gloucester Street (item 4500101).
- The site as a whole is also within The Rocks Conservation Area, also listed on the Sydney Harbour Foreshore Authority S170 Register (item 4500458) and is in the vicinity of a number of heritage listed items as shown in Figure 2 below.

Figure 2 – Heritage context of Bakers Terrace showing items of State Heritage significance listed in red and the subject site outlined in blue.



Source: Map of Heritage Listings in The Rocks, The Rocks Heritage Management Plan Volume 1, 2010, Sydney Harbour Foreshore Authority.

Figure 3 – Heritage Curtilage for “Baker’s Terrace” (SHR01530), located at 66-68 Gloucester Street.



Source: Office of Environment and Heritage, Heritage register:  
<https://www.environment.nsw.gov.au/heritageapp/HeritageItemImage.aspx?ID=5053145#ad-image-6>.



Figure 4 - Heritage Curtilage for "Baker's Terrace" (SHR01530), located at 70-72 Gloucester Street.



Source: Office of Environment and Heritage, Heritage register;  
<https://www.environment.nsw.gov.au/heritageapp/HeritageItemImage.aspx?ID=5053146#ad-image-6>.

## PROPOSED MODIFICATIONS AND ASSESSMENT

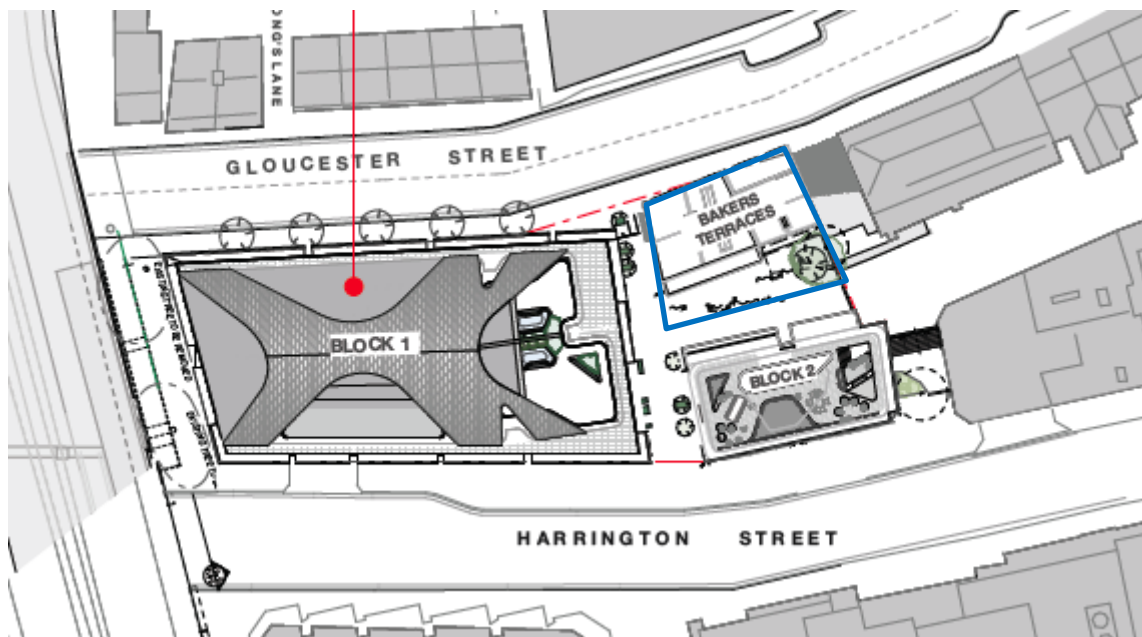
This HIS letter responds to the amendments in the plans package prepared by FJMT

- S4.55 (1a) submission package revision *A6 dated December 2018*
- Landscape architecture design report Rev 6, dated November 2018

The proposal is generally for external modification of the blocks known as block 1 and 2 shown, these are within the existing form and scale and are in the same architectural language. They are generally design development and refinements of facade elements.

There are also internal modifications proposed to the state heritage listed buildings, Bakers Terraces and the rear public courtyard space that forms part of the Cambridge Street Lane to satisfy conditions of consent and are also design development and refinements.

Figure 5 – Location plan of proposal (Bakers Terraces outlined in blue)



Source: FJMT

## BAKERS TERRACE MODIFICATION

The below outlines the proposed modifications for the Bakers Terrace and the rear courtyard

The proposed changes are generally internal layout changes (except for the courtyard) and are due to requirements for design changes as part of the conditions of consent or further detailed internal configuration, layout planning and input from Place Management heritage specialists. The changes to the terraces are all to internal layouts only, and do not involve any external facades and do not remove or alter any fabric of any heritage significance.

### Basement level

The amended plans for the basement level involve (as shown on the below plans)

**1.0 Internal modifications to retain all internal walls** that are likely structural and represent the original layout that are currently enclosed behind a 1990s brick skin internal wall. It is assumed from the layout and the CMP that these concealed walls are original fabric. This modification is a requirement of the conditions of consent. This is a positive heritage impact. (FJMT drawing note reference L1(iii))

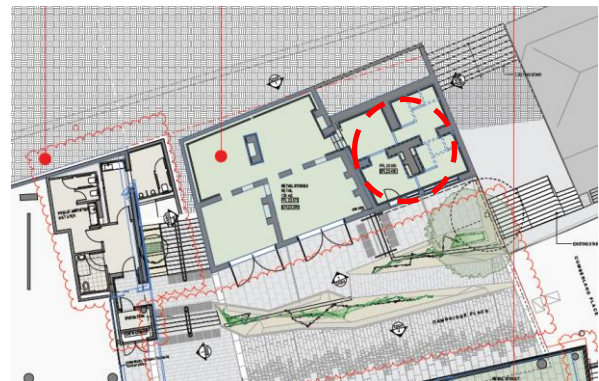
**2.0 Clarification on the original RLs to the basement.**

Further investigation has been completed to clarify the original RLs of the basement and are included in this design update. (FJMT drawing note reference L1(iii))

Figure 6 – Bakers terrace previously approved and proposed basement plans



Picture 1 – Approved SSDA plan



Picture 2 – Proposed modified plan (red dashed line indicates area of change)

Title Plans: Level H1 – C2 Floor Plan, revision **A6**

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- INDICATES BUILDING OUTLINE "AS APPROVED"

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  - ✂ INDICATES CHANGES FORMING THIS APPLICATION

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Figure 7 – CMP significance map basement level (proposed area of change shown in red)



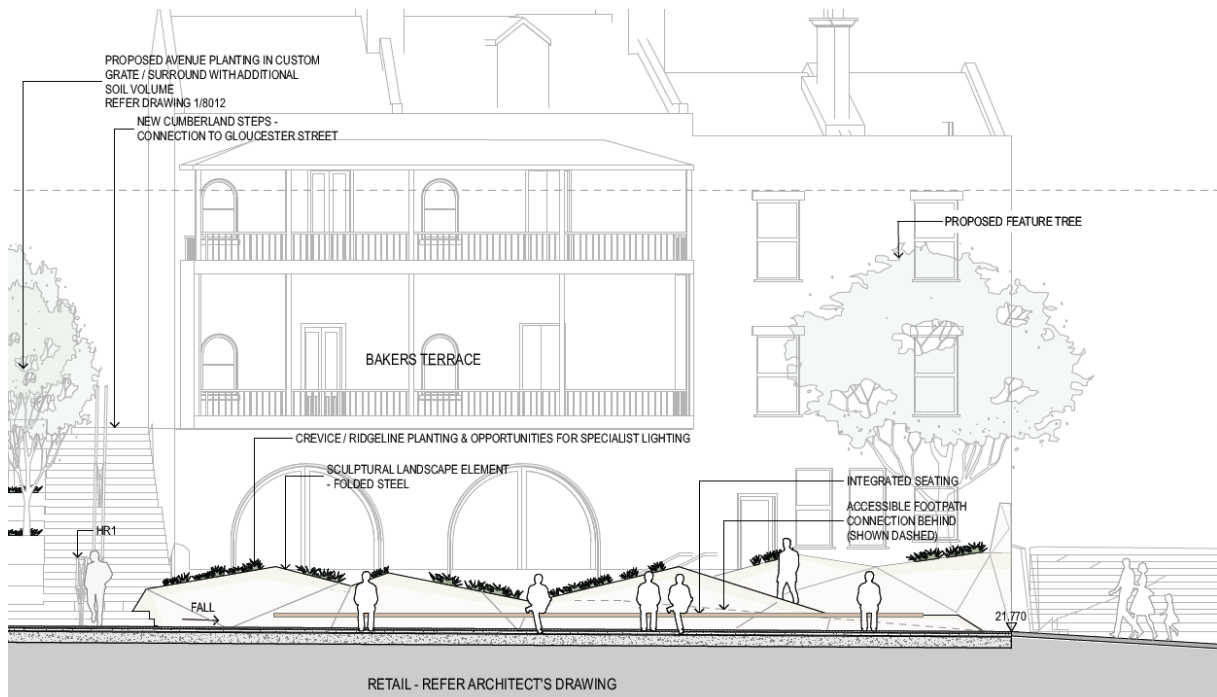
Source: Urbis CMP 2017

### 3.0 Landscape modifications

The landscape modification is a result of further design development and understanding of the complex level changes in this zone. The revised layout and levels is driven principally to provide a more integrated less intrusive equitable access to the basement and courtyard / laneway areas.

The major aesthetic change is the sculptural form that encases the access ramp and provides seating, planting and interpretation areas. This sculptural form has been designed in conjunction with artisans to provide a site-specific response to the courtyard that is contemporary. The design uses this regeneration opportunity to interpret the heritage context in a contemporary way in this highly public and unique space that is typical of The Rocks. The revised paving further defines the design to interpret the approximate location (exact locations to be confirmed) of the former Cumberland Place alignment.

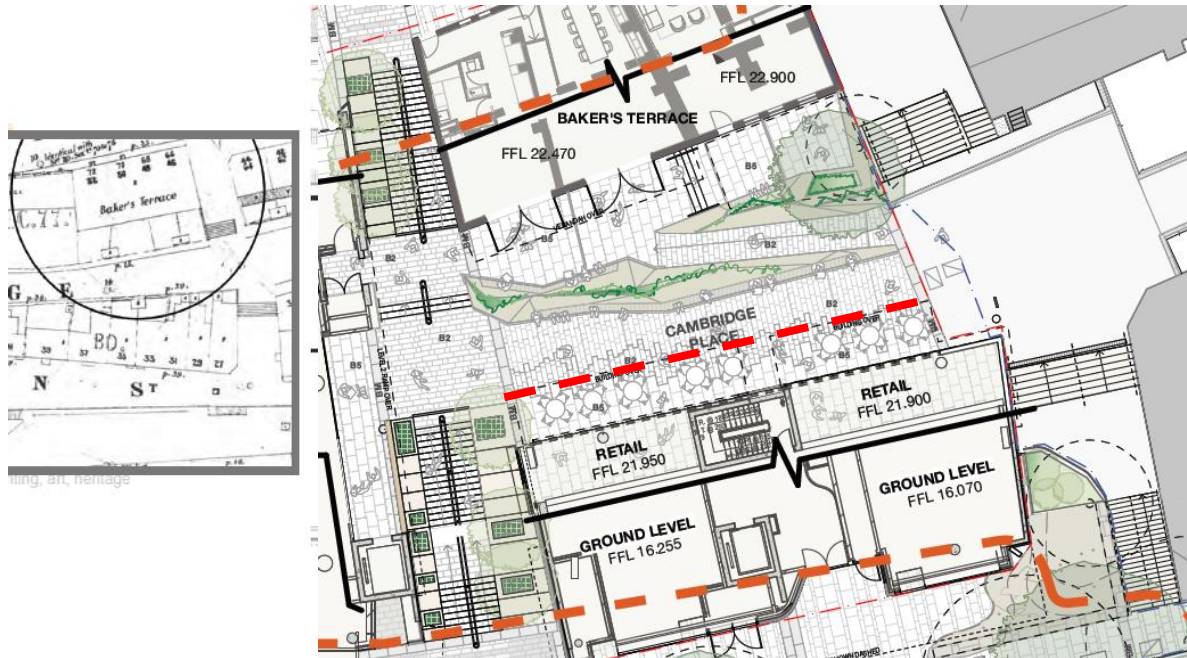
Figure 8 – Rear courtyard elevation showing sculptural element.



Source: FJMT landscape design presentation - rev 6

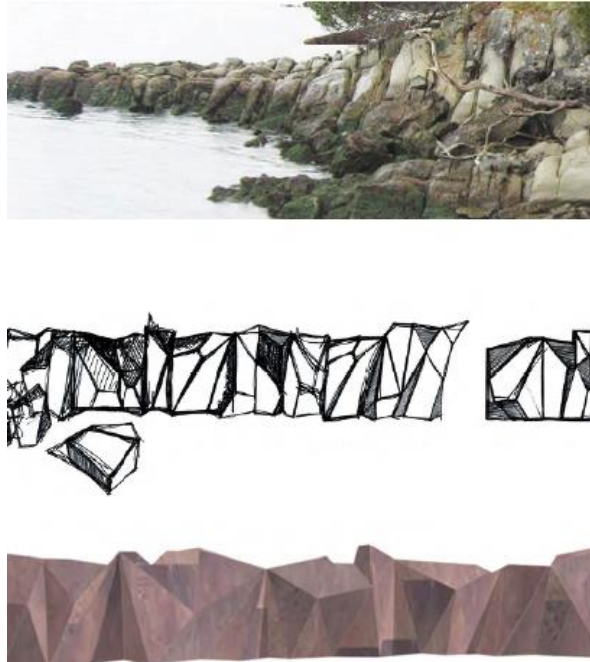


Figure 9 - Rear courtyard plan showing sculptural element, and approximate location of Cambridge St alignment



Source: FJMT landscape design set

Figure 10 – Design development inspiration for courtyard sculptural element.



Picture 3 – Design inspiration sketch for courtyard  
Source: FJMT



Picture 4 –The rocks historic photographs  
Source: Urbis CMP

Figure 11 – Sculptural design inspiration from the rocks



Picture 5 – The rocks historic photographs  
Source: Urbis CMP



Picture 6 – The rocks historic photographs  
Source: Urbis CMP

## Ground level

The amendments to the ground floor plans are internal and are the result of more detailed internal planning layouts from the initial design and feedback from Place Managements heritage specialists. This includes detailed review of special configurations, services and retention of significant fabric.

### 4.0 Internal stair to southern (right side) terraces relocated to front portion of the terrace.

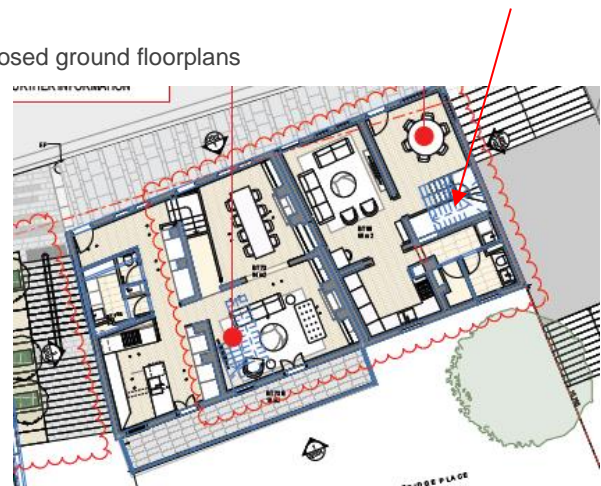
The change of location of the stair presents no change or alteration to significant fabric and is proposed by the architects to achieve a more functional internal layout. This alteration has no effect on heritage significance and is therefore supported on heritage grounds.  
(FJMT drawing note reference L2(i))

### 5.0 Relocation of dining room and bathrooms. Relocated to satisfy conditions of consent and the request from PMNSW, Strategic Planning and Heritage Division. This relocation is a positive heritage outcome as the new dining room more closely reflects the larger room layout to the front of the terrace. (FJMT drawing note reference L2(i))

Figure 12 – Bakers terrace previously approved and proposed ground floorplans



Picture 7 – Approved SSDA plan



Picture 8 – Proposed modified plan (red dashed line indicates area of change)

Title Plan: Level H2– C3 Floor Plan (Gloucester Street), revision **A6**



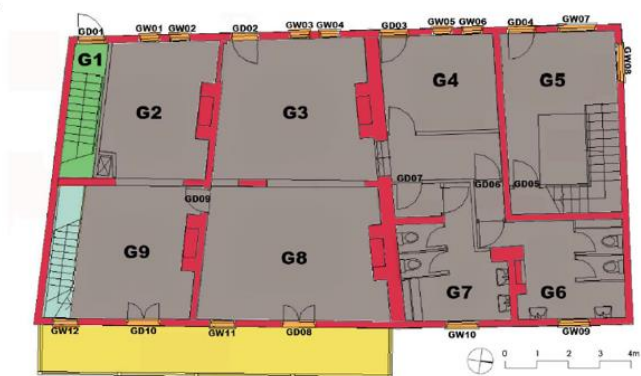
-  INDICATES BUILDING OUTLINE "AS APPROVED"
-  INDICATES CHANGES FORMING THIS APPLICATION

Figure 13 - CMP significance map ground level



Source: Urbis CMP 2017

## **First floor**

The amendments to the first-floor plans are internal and are the result of moving the stair to retain the central original wall identified of exceptional significance in the CMP. The amendments are internal and are the result of more detailed internal planning layouts from the initial design and feedback from Place Managements heritage specialists. This includes detailed review of spatial configurations, services and retention of significant fabric.

### **6.0 Relocation of the stair within the northern most terrace.**

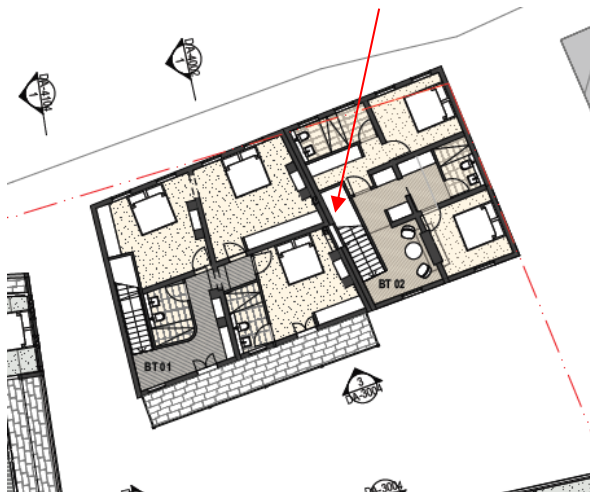
This is to retain the section of wall identified on the CMP as original / exceptional significance. This stair relocation also involves the relocation of bathrooms to accommodate its new position. This relocation has a positive heritage outcome as it is more appropriate to not have a bathroom on the front façade and retain this as a habitable room and locate the bathroom in the new central position.

### **7.0 Split Level bedroom to first floor of 68-70 Gloucester Street**

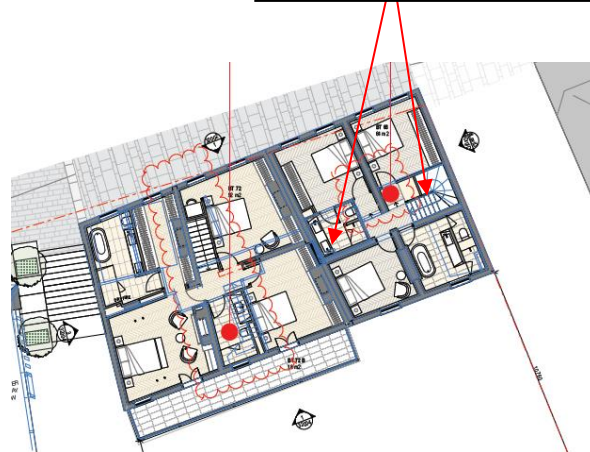
Changes to the floor level to the norther pair of terraces (68) are proposed such that the FFL of level 1 is 29.650 to the two front bedrooms via a new floor frame on top of the existing structure. The front façade of the building is presented to the streetscape to match the windows aesthetically across the row of four. Due to this the site typography internal levels of the front bedrooms of the northern pair (to Gloucester St) have very high-level windows to bedrooms that are difficult to see out if and therefore provide reduced amenity to those rooms. This new level will involve the inclusion of two steps in the hallway to a new raised floor level to provide outlook from the bedroom windows. This new step and floor structure will sit on top of the existing as a new fame and will be completely reversible in the future if desired. Therefore, it is assessed that this element has no negative heritage impact from a heritage perspective. It enhances the amenity to make this a desirable space for residential occupation as per the original historic use.



Figure 14 – Bakers terrace previously approved and proposed first floor plans



Picture 9 – Approved SSDA plan



Picture 10 – Proposed modified plan (red dashed line indicates area of change)

Title Plans: Level H3– C5 Floor Plan (Gloucester Street), revision **A6**

□ INDICATES BUILDING OUTLINE "AS APPROVED"

✂ INDICATES CHANGES FORMING THIS APPLICATION

Figure 15 – Elevations of Bakers terraces (please see note on last page referring to East Elevation outer and correction advice on basement doors)



Picture 11 – West elevation Bakers Terrace

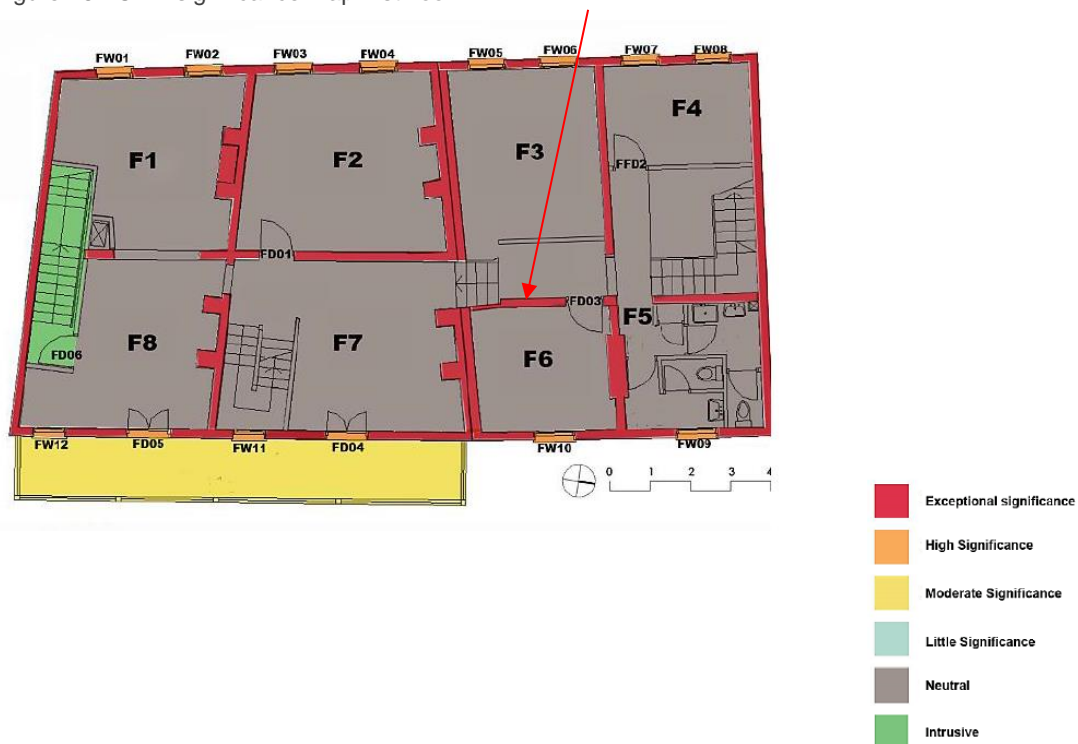
Source: FJMT



Picture 12 – East elevation Bakers Terrace

Relocation of stair and bathroom shown on prior plan to retain central wall shown here

Figure 16 - CMP significance map first floor



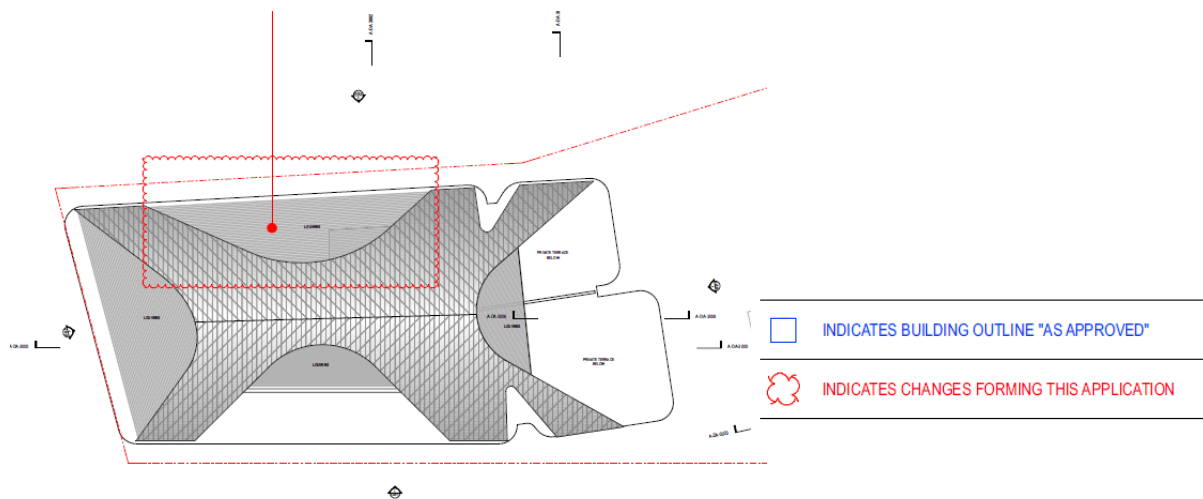
Source: Urbis CMP 2017

## Main building amendments (Block 1 & 2) (new buildings)

### 8.0 Additional louvred opening to roof on western side to provide ventilation for plant

The proposed changes to the roof do not alter the overall form, scale or presentation of a solid roof form and therefore have no change to the impact assessment on heritage grounds.

Figure 17 – Proposed changes in plan to roof (area shown in red amendment bubble)

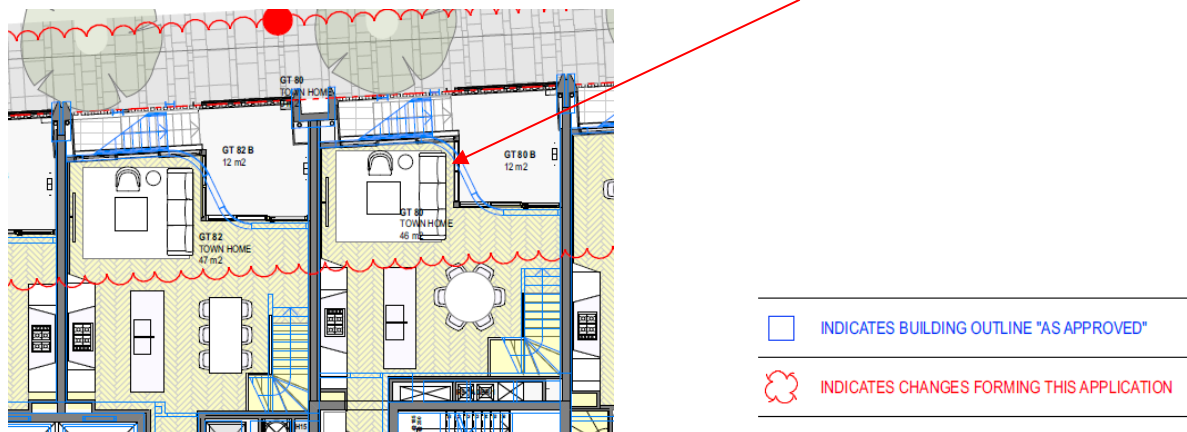


Title Plans: Roof Plan DA - 2010, revision **A6**

### 9.0 Minor alterations to terrace facade break up on Gloucester Street to provide greater design amenity to living rooms.

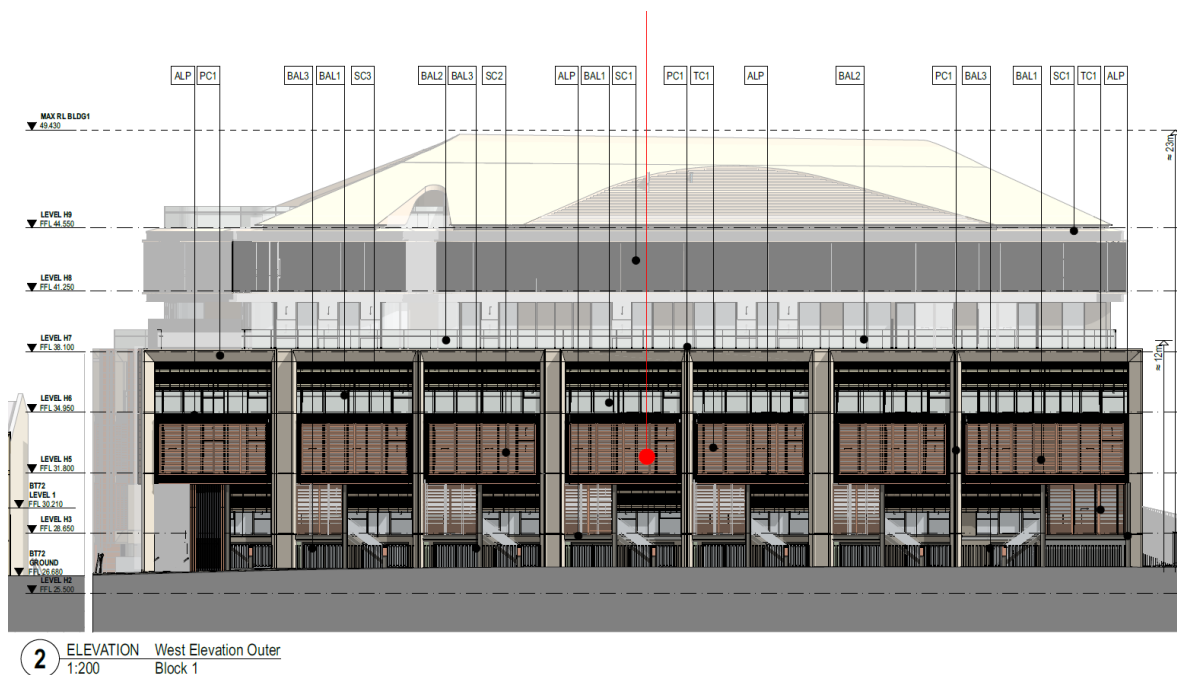
The proposed minor change to the plan layout to the living room of the new terraces do not change the overall form scale or presentation of the contemporary terrace form. Nor do they alter the resolved proportion and scaling of these architectural elements and their presentation and cohesion to the heritage streetscape.

Figure 18 – Proposed changes in plan to new terraces fronting Gloucester Street



Title Plans: Plans, level H3 – C5 Floor Plan DA-2004 revision **A6**

Figure 19 – Proposed changes in elevation to new terraces fronting Gloucester Street



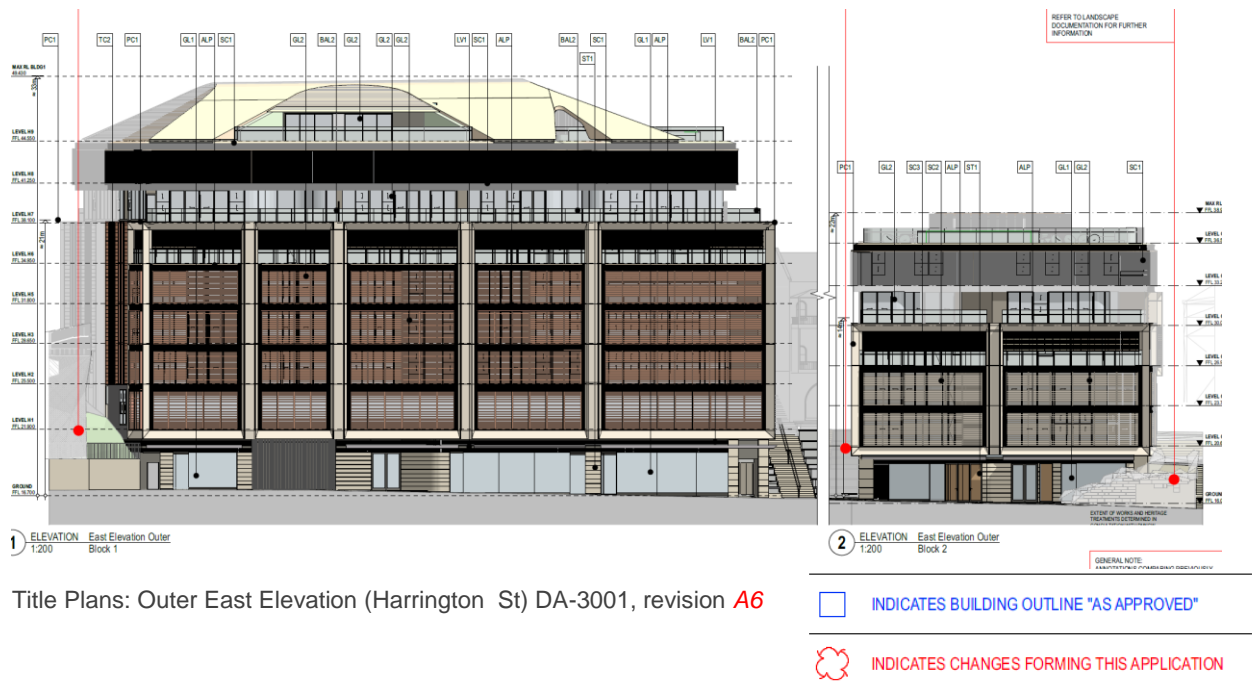
Title Plans: Outer West Elevation (Gloucester St) DA-3002, revision **A6**

## 10.0 Minor alterations Harrington Street facades, and outer north

The changes are minor and related to internal planning and facade detail design layouts. They do not alter the design intent or architectural language response to the heritage context.

We also note the sandstone blockwork and bedrock to the northern corner at the stair junction is being retained in situ, the contemporary building wraps in behind.

Figure 20 – Harrington Street facades.



Title Plans: Outer East Elevation (Harrington St) DA-3001, revision A6

In addition to the above, we also advise for reference that the current drawing set has been updated to correct a previous minor error in the original submission. The basement doors to Bakers Terraces that front Cumberland Place are to be retained as the existing opening. The previous drawing set showed this opening incorrectly. This detail is located on drawing DA-3004, detail 1 East Elevation Outer.

Due to the above discussed the proposed works are considered minor generally and where more substantial around the courtyard are supported on heritage grounds as a well resolved contemporary response embracing the heritage character and are recommended for approval.

If you have any questions please don't hesitate to contact me at 0404035520 ,  
kpaterson@urbis.com.au.

Yours sincerely,





A handwritten signature in black ink, appearing to read "Kate Paterson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kate Paterson  
**Director Heritage**