

I object to the proposed development, particularly the appropriateness and design of a new four-storey glass box to the north of Campbell's Stores. This is an intrusive and ill-conceived structure that will have negative visual impact, diminish the heritage significance of Campbell's Stores and result in the loss of the opportunity for improved public access and landscaping to the foreshore of Campbell's Cove.

The objection is on the grounds of:

- Non-compliance with existing development controls and heritage provisions that apply to the site.
- Detrimental impact on the Hickson Road streetscape and to the character of The Rocks
- Detrimental impact on the heritage significance of Campbell's Stores.
- Detrimental impact on the amenity of residents of 8 Hickson Road and guests of the Park Hyatt Hotel.

Objections on the grounds of non-compliance with existing planning and development controls for Campbell's Stores:

- The proposed new glass building does not comply with the current height limit and the applicant has applied for a "spot rezoning" to increase the height along the waterfront by more than five times the current permissible height limit - from RL3.5 to RL18. Any review of planning or development controls for this historic and strategic site should be undertaken comprehensively and not in isolation. I object to any increase in the height restrictions as set out in the SCRAS document.
- The proposal exceeds the height restriction on the foreshore frontage by 14.5 m, more than 250%, and on the Hickson Road elevation, by 10.5 m, or 140%.
- As shown below, the proposal does not comply with a large number of conservation policies contained within the Campbell's Stores Conservation Management Plan (CMP), which SHFA commissioned and the Heritage Council endorsed in July 2014.

– **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 capable of being removed without damage to significant fabric or space.

Objection on the grounds of detrimental Impact on Hickson Road streetscape and the heritage character of The Rocks due to the construction of the four-storey glass box.

- The eastern streetscape of Hickson Road is a very open streetscape, with significant gaps, 20m or more, between groups of buildings. These provide views to Campbell's Cove, Sydney Cove, the Opera House and the harbour generally. Infilling the gap between Campbell's Stores and the Park Hyatt Hotel is not appropriate to either the existing or historic Hickson Road streetscape. The land to the north of Campbell's Stores should be unbuilt upon. The existing unapproved glass structure should be removed and the space used for public access to the waterfront and landscaping.
- The dominant elements in this section of Campbell's Cove foreshore are, and should remain, Campbell's Stores and the fig tree.
- Even if it was considered appropriate, which it is not, to erect a building within this space the proposed building is an unsympathetic design in terms of proportions, material and overall scale in this highly sensitive area. The height of the building is excessive, and should be restricted to the SCRAS' restriction of one storey. The proposed four-storey glass box has no relationship to Campbell's Stores in respect to height, width, roof shape or materials.
- Restriction and loss of opportunity to restore generous public views to the foreshore area from Hickson Road with the removal of the existing pavilion.
- I object to privatisation of an area that historically was public foreshore and public domain;
- Reliance on an existing tree to screen the proposed building from view serves to highlight the inadequacy of its design and the inappropriateness of its location.
- I am concerned about possible impacts to the existing fig tree due to construction within the root zone and the necessity to lop approximately 4m of the branches so as to facilitate construction.

Objections on the grounds of detrimental impact on the heritage significance of Campbell's Stores

- The proposed new four-storey glass building is out of context, dwarfs the heritage building and will be the tallest built element along the foreshore and Hickson Road promenades. It is located within the buffer zone of the World Heritage-Listed Sydney Opera House and would disrupt the view of 19th century Sydney that can currently be appreciated from that venue
- The proposed glass box is to be located within the defined heritage curtilage of the Campbell's Stores and so is at odds with the guidelines for **Policy 13 of the CMP** which states: "*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, GML 2014, p.168)
- Locating the new glass box in place of the existing intrusive structure to the north of the Stores, will obscure views of the northern elevation of Bay 11 and destroy the opportunity for people to appreciate Campbell's Stores' historic significance as a stand-alone industrial building within its maritime setting. This would be particularly the case when the building was viewed from the north, including from the northern end of Hickson Road, from the pedestrian pathway on the eastern side of the Sydney Harbour Bridge and Dawes Point Park when it is reopened for public use on completion of the Harbour Bridge restoration work (see Photomontages 6a and 7a).

- 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 public space provides the opportunity for the thousands of people who visit the Rocks to actually see the Campbell's Stores northern elevation and to deliver the full heritage curtilage.
- The basement level of the proposed glass box will abut the ground level of Bay 11 effectively burying the northern elevation of the classified 'Highly Significant' heritage façade to approximately top of door height on the ground floor.
- The CMP notes that better integration from Hickson Road via a pedestrian walkway in front of the Campbell's Stores would provide for increased and improved public access to Sydney Harbour and Campbell's Stores and an increasing value to the site in both community and economic terms.
- 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. Rather, the Stores have always been 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 described it, is to irrevocably and detrimentally alter the heritage setting of the Stores' building and the historical context within which it will be appreciated.
- The proposal does not address the existing voids within the Stores 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. As such rather than utilising existing and sometimes inappropriate modifications carried-out in the past, the application proposes further inappropriate modifications.
- The current proposal involves the introduction of new uses to the Hickson Road frontage. It involves unsympathetic alterations to existing openings including new concrete entry portals with back-lit signs and potentially the introduction of chairs and tables, umbrellas and street trees. The end result will be that the Hickson Road frontage of Campbell's Stores will be cluttered and visually obscured. It will be hard for anyone to understand and appreciate the original form and use of this building. Its 'Exceptional' heritage significance will be undermined. This western elevation of Campbell's Stores is its most original and uncompromised elevation. As such, there should be very minimal work carried out on the Hickson Road elevation of the building.
- The noise, wind and air assessments that accompany this State Significant development application are based on a range of assumptions and suggest further detailed elements to be addressed at the development stage. This is not adequate. They should be addressed at the time of application and clearly shown on the architectural drawings.
- 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.

Objections on the grounds of detrimental impact on the amenity of occupants of 8 Hickson Road and the Park Hyatt Hotel

- Noise impacts on residents as a consequence of late night/early morning trading hours would be significant.

There is no specific detail about number and type of uses, yet the applicant is seeking approval for the hours of operation as follows:

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

The applicant could potentially obtain approval for long hours and turn the proposed glass box building into bars, clubs, restaurants and function centres, with late trading near Hickson Road residents and guests at the Park Hyatt Hotel. This will result in noise disturbance with noise emitted from the premises, including amplified music and the noise from departing patrons in the early hours of the morning.

Without confirmation of land use, of the proposed four-storey glass building, the Department cannot appropriately assess and determine the hours of operation and operational impacts on nearby residents.

- 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 does not provide an overarching Plan of Management that addresses the large number of people patronising disparate restaurants and bars; considers patron management, noise and security; and addresses anti-social behaviour.
- Noise emitted through the proposed 'open window' ventilation design will severely impact residents at 8 Hickson Road and potentially also guests at the Park Hyatt Hotel.

The existing 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 EIS appear to have assessed the impact on residents at 8 Hickson of noise from restaurants and bars, including amplified music, as a consequence of the proposed 'open window' ventilation design.

- **Noise and fumes from the kitchen exhaust system emitted from the roof of Bay 11 will impact on the residents of 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 only resident-occupied buildings within proximity of the site.

The existing kitchen exhaust system, which serves a smaller number of kitchens, already impacts on residents at 8 Hickson Road particularly when the wind is blowing from the north-east. All kitchen exhaust should be directed to the southern end of the building and discharged from there, where noise and fumes will have the least possible impact on existing residents.

- **The stack height and sound barriers erected to mitigate noise and fumes of the kitchen exhaust will substantially impact on my Opera House views.**

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. Both of these mitigating factors 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 views and on our enjoyment of our property. (Air Quality report and kitchen exhaust 9.2.1 Emission Height).

- **Loss of On-Street Parking on Hickson Road.**

There is no detailed description about works to Hickson Road, such as loss of on-street car parking or specific details about outdoor seating and dining. Loss of on-street parking is a concern to residents as it further limits the availability of visitor and tradesmen parking, which is already a substantial problem in this part of Hickson Road. Loss of street parking would also affect visitors to The Rocks Markets on the weekends, when buses cannot service this area due to the closure of George Street.

Conclusion

Land to the north of the Campbell's Stores, where the new building is proposed to be located, should be dedicated as public open space, used solely to facilitate public access to and from the foreshore and to provide landscaping including the retention of the fig tree.

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 Campbell's Stores.

The proposed development is a high risk, no reward, project for the people of Sydney. The proposed four-storey glass box has a very high risk of negatively impacting the 'Exceptional Significant' heritage-classified 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 1,000 m² of commercial floor space just does not warrant the risk to such a heritage-sensitive location.