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GMU Reference: 15230

The Secretary  
NSW Department of Planning and  
Environment  
GPO BOX 39  
Sydney NSW 2001

Date: 17/12/2015

**Re: State Significant Development Application and Variation of the Sydney Cove  
Redevelopment Scheme for the 'Remediation, Renewal and Adaptive Re-Use of Campbell's  
Store', The Rocks (SSD 7056).**

GM Urban Design & Architecture (GMU) has been engaged by the owners of 8 Hickson Road, The Rocks to review the State Significant Development Application for Campbell's Stores, The Rocks and provide an independent urban design assessment on the appropriateness of the proposed works. No 8 Hickson Road (our clients' property) is the closest residential building to the proposed extension of Campbell's Stores, referred to as 'Bay 12'.

This review forms part of an objection submitted by the Owners Corporation of 8 Hickson Road, The Rocks (Strata Plan No. 70158) and should be read in conjunction with an objection letter by Sarah Kelly, SAKE Development dated 16 December 2015 and by Clive Lucas, Stapleton & Partners Heritage Consultants.

The opinions and conclusions described in this review have been developed by GMU independently, based on best practice urban design principles and a detailed analysis of the existing context and the proposal.

The assessment of the proposal is based on the following available information:

- The Environmental Impact Statement prepared by Urbis dated October 2015 including Appendices, in particular:
  - Design Statement by Johnson Pilton Walker (JPW)
  - Secretary's Environmental Assessment Requirements
  - Architectural Drawings by JPW dated 16/10/15
  - Heritage Impact Statement
  - Arboricultural Assessment
  - Visual Impact Assessment
  - Detail Survey by Project Surveyors dated 31 July 2015

GMU has also reviewed the following controls:

- Campbell's Stores Conservation Management Plan by GML dated July 2014 endorsed by the Heritage Council on the 15 July 2014
- Sydney Cove Redevelopment Authority Scheme – Building Site Control drawing XVII

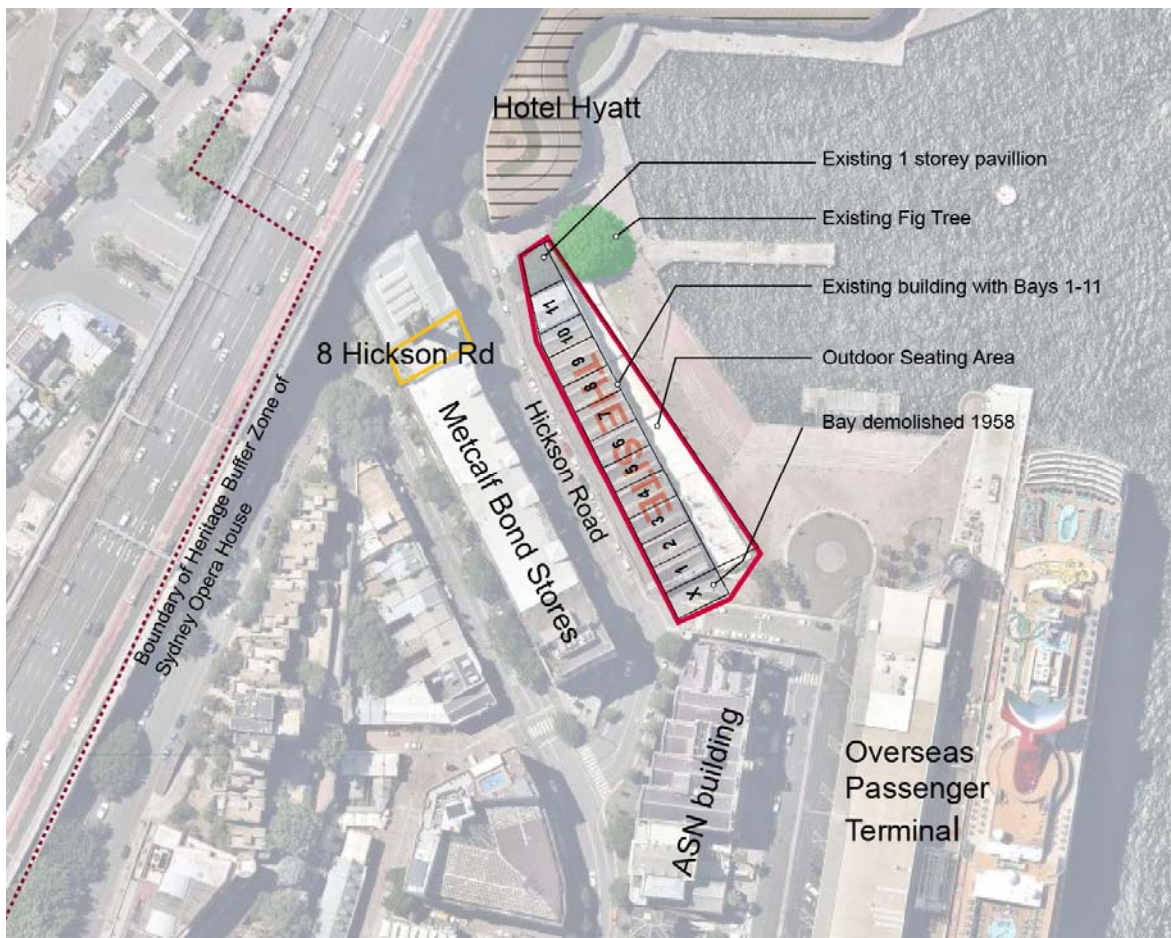
GMU has also undertaken a site visit and viewed the subject site from the owner's properties at level 4 of 8 Hickson Road.

## Executive Summary

GMU has reviewed the proposal based on the context and the applicable controls and recommends refusal of the addition to the existing heritage listed Campbell's Stores, referred to as Bay 12. Our review shows that the new building is not appropriate as a response to the existing historical context. The new building will be intrusive in the context of the Rocks foreshore area and public domain as well as in relation to the existing heritage stores.

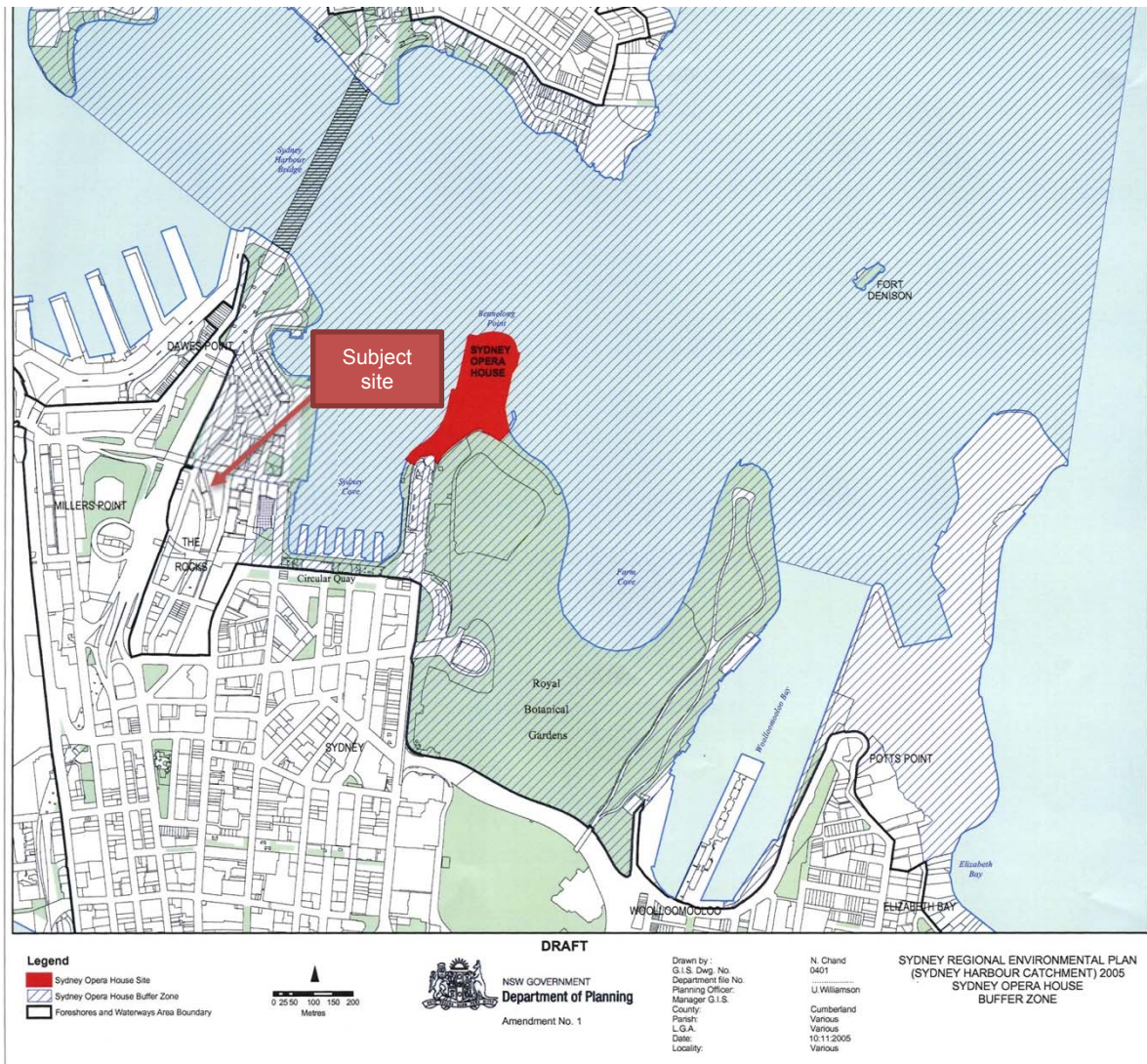
## The site and its context

The Development Application (DA) is for the adaptive re-use of the existing state listed heritage item called Campbell's Stores located to the south of the Hyatt Hotel in The Rocks. The exact address is 7-27 Circular Quay West, The Rocks. The localisation of the site is shown on the map below:



*Map showing the location of 8 Hickson Road (our clients' property), Park Hyatt Hotel, ASN building, passengers terminal, the extent of Opera House Heritage curtilage zone, the fig tree, each bay of Campbell's stores.*





*Map showing the extent of Opera House buffer zone and the location of the subject site.*

The existing building on the subject site is a heritage listed sandstone and brick building, erected in its current form between 1882 – 1915. The first mention of Campbell's Cove and Campbell's store was at the beginning of 19<sup>th</sup> Century when Robert Campbell (1769-1846), a pioneering and leading merchant in the young Colony, started a development of the warehouses in this location (Source: Sydney Historical Notes). The existing Bays 1-10 and Bay X, which no longer exists, were developed in the period 1851 to 1861 as two storey warehouses with roof shapes similar to those of the existing building. Bay 11 and the third storey were added in 1895 to 1915, followed by the demolition of Bay X in 1958 to provide space for the Overseas Passenger Terminal.

Viewed from the foreshore, the existing Stores building currently has an area of outdoor seating covered with shade cloth with timber masts as decorative elements in front of it. The white shade cloth and masts are a reference to 19<sup>th</sup> century sailing ships, but these clutter the appreciation of the heritage stores. The outdoor dining area is separated from the public domain by a low sandstone wall and a change of level between public foreshore and the seating area.



*A photo of the existing outdoor dining area with shade cloth and masts which clutter the eastern façade of the heritage stores.*

There is a further addition to the original warehouse building located to the north of Bay 11 between the Campbell's Stores and the Park Hyatt Hotel. This addition is a single storey pavilion, used by the restaurant located in Bay 11 (Italian Village). The pavilion is used as an extended dining and function area. We are not aware of any evidence that there is a formal approval for this pavilion. Based on our clients' research, the pavilion was erected, possibly with approval as a temporary pergola structure c.1991 by the tenant of the restaurant next door. The subsequent erection of the pitched roof, lattice screens, glass wall and doors and the internal lining of the roof and walls seems to have been carried out without any form of approval progressively from 2002 onwards. Historically, this site was part of the public domain with Campbell's Stores able to be seen in the round.



*Photos showing the existing single storey pavilion – seen from the east – the foreshore (left) and from the west – Hickson Rd (right)*

The existing warehouse building is characterized by a sequence of identical pitched roofs, relatively small openings within the façades made of sandstone and brick. Each bay is quite regular other than the northern bay, Bay 11. This bay is slightly taller and designed with slightly different details. This is possibly due to the different lot shape. The architectural differentiation accentuates the end of the sequence, providing the building termination which was historically visible from the north and from the water.

Campbell's Stores are described on the Heritage Council's website as *'a superb example of mid-nineteenth century warehouse buildings, now the only surviving warehouses of their type remaining on the foreshores of Sydney Cove'* (Source: Heritage Council website).

The site is a State Significant Heritage Listed Item located within the buffer zone of the World Heritage listed Sydney Opera House and in direct proximity to a number of other state significant buildings, including:

- Australian Steam Navigation Building (ASN Building), which is located to the south along Hickson Road, characterized by steep pitched roofs and a tower (built in 1884), which is a rare Pre-Federation Anglo Dutch architectural style;





*Photo showing the subject site to the left and the ASN Building to the right with the characteristic tower.*

- The Metcalfe Bond Stores building, located to the west of Hickson Road was constructed in the functionalist tradition. It has a landmark significance as part of the important early 20th century townscape in The Rocks, as described on the Heritage Council's website.



*Photos showing the Metcalfe Bond Stores as a backdrop to the Campbell's stores. (The one to the left is from mid 20th Century)*

A public walk/plaza along Sydney Foreshore is located to the east of the stores and it provides one of the best views of Sydney Harbour including the Opera House across Port Jackson. The northern end of this area is enclosed by the Park Hyatt Hotel which is a 3 storey contemporary building located approximately 26m from the northern end of Bay 11.



*A view from the foreshore in front of the Stores with the Opera House across the water and a view towards the existing Fig tree which is at the end of the public walkway before the Hyatt Hotel.*

The Hyatt Hotel's parapet level is RL 16.4 with additional structure at RL 17.1. It is approximately 1m taller than the ridge of Bay 11, which is at RL 15.4m and 3m over the gutter height which is at RL 13.28. The remaining bays of the stores are at RL 14.7-14.83 and up to RL 15.6 at the southern end.

This subject site is located in a highly sensitive area with extremely high visibility. Any amendment to the existing built form requires careful consideration.

The stores are a major built form elevation creating the edge and enclosure to the harbour. When viewed from the Opera House and the foreshore promenade they provide a notable silhouette against the structure of the Sydney Harbour bridge. They form a significant character element to the foreshore and are appreciated also from any cruise ships in the harbor as well as people within the Passengers Terminal.

This part of the foreshore creates a recessed pocket of 'safe' public space with excellent viewing opportunities. Maximising connectivity into and through this area is important as are the remaining pockets of vegetation seen along the foreshore.

## The Proposal

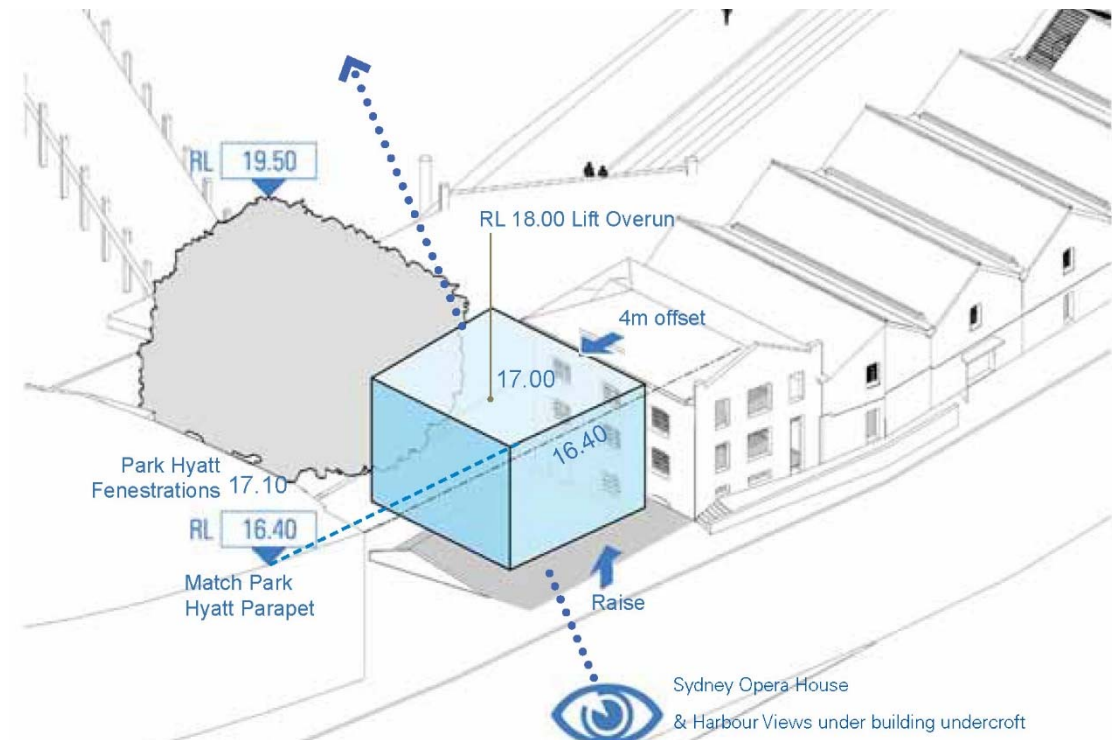
The proposal comprises the following elements:

- Remediation – including solutions to the impacts of the rising damp such as upgrades to the existing stormwater infrastructure and the changes to the ground level of the outdoor dining resulting in improved water collection and run-off;
- Conservation – including replacement of deteriorated sandstone and the replacement of the existing slate roof with tiles;
- Adaptive re-use and revitalization – external and internal building alterations and additions, such as:
  1. Changes to Bays 3,6 and 9 to provide public access to and from Hickson Road and the access to public toilets;
  2. Proposing new voids between second and third level to allow stair connections and visual connections.
  3. Changes to the kitchen locations in an attempt to consolidate kitchen exhaust risers and relocating it in the northern end of Bay 11.
  4. New glass and precast concrete awning structure and an extension of the outdoor dining area towards the east. The proposed awning structure is separated from the building's eastern façade by approximately 3m except for the areas directly above the entries to the individual bays;
  5. Removal of the sandstone wall on the eastern side of the site and replacing with a green hedge and a retractable vertical wind screen;
  6. New entry portals on the western façade providing entries to the restaurants from Hickson Road plus associated outdoor dining areas along Hickson Road with no permanent shading structure;
  7. New ventilation elements on the roof including new louvers for air intake on Bay 11 and areas with new skylights;
  8. Changes to the paving finishes along the eastern outdoor dining area;
  9. New raised pedestrian crossing to the west of Bay 6 and street tree planting along Hickson Road;
  10. Removal of the one storey pavilion and a tree to the north of Bay 11;
  11. Construction of a 4 storey high building to the north of Bay 11 and separated from the heritage building by approximately 4m. It is referred to as Bay 12. The proposed new building has a raised ground level to match the level of the footpath along Hickson Road. The space under the raised ground level is proposed to be used mainly for toilets and storage. The raised ground level is

higher than the ground level of Bay 11 and as such it obstructs the outlook of the existing windows facing north at ground level.

The new building proposes an open undercroft that is 2.5m high above ground level. It is open except for 4 columns and the vertical circulation connecting the 3 levels above. The ground level appears to be intended to provide public access under the building from Hickson Road to the foreshore; however, the architectural drawings indicate potential for some dining within this space, but with no particular function specified for this area.

The building is 12.3m high (plus 1m for the lift overrun) when measured from the proposed new ground level of RL 4.6. This ground level is almost 2m above the existing ground level of the foreshore to the east. The proposed height of the lift overrun for Bay 12 is RL18 and the roof is at RL17. The justification of the height is based on the small decorative fenestration element of Hyatt Hotel building. We do not consider this element forms a suitable reference point. Given Bay 11 is at RL 15.4 (ridge) the roof of the new building will be significantly taller than the ridge and nearly 4m higher than the gutter line of the stores. The proposed structure will be the highest structure in this row of buildings on the eastern edge of Hickson Road.



The other height justification proposed in the application is the height of the existing Fig tree. This tree is located to the east of the proposed Bay 12 building. Its canopy reaches RL 19.5. GMU does not consider that it is appropriate for the building to reference the height of the tree and therefore dominate the built form character.

The proposal has a separation of approximately 10m from the hotel's façade including balconies. This may reduce some views from the hotel rooms. It will also increase the enclosure of the publicly accessible foreshore area and limit visual and special connection to the water from Hickson Road.

The proposed new building is clad in glass blocks and has cubic form. Its character is that of a 'glass box' on stilts. The use of glass blocks as the only material for the building's façade is intended to increase transparency of the building. The building consists of 3 levels and will have services, ceilings as well as concrete slabs and the roof structure. These elements will not be transparent. The proposed glass blocks are also not transparent. As a result, the building will be quite solid.

The use of the four-storey high structure is not detailed in the application. The use is generally described as retail; however, no specific function has been established for the area called 'Bay 12'.

One of the four central concepts that guided the proposal, in the Design Statement is to *'create an event and after party convention experience that is unforgettably Australian.'* This statement and the fact that the opening hours requested for the site are to 2am in the morning indicate that the uses could reasonably be interpreted to include nightclubs etc. Such a use concerns the residents of 8 Hickson Road, who are only 20m away from the proposed 'glass box'. Such a use can generate significant noise and light spill impacts at night. GMU also notes that it is unusual to design a building where the function is yet unknown.

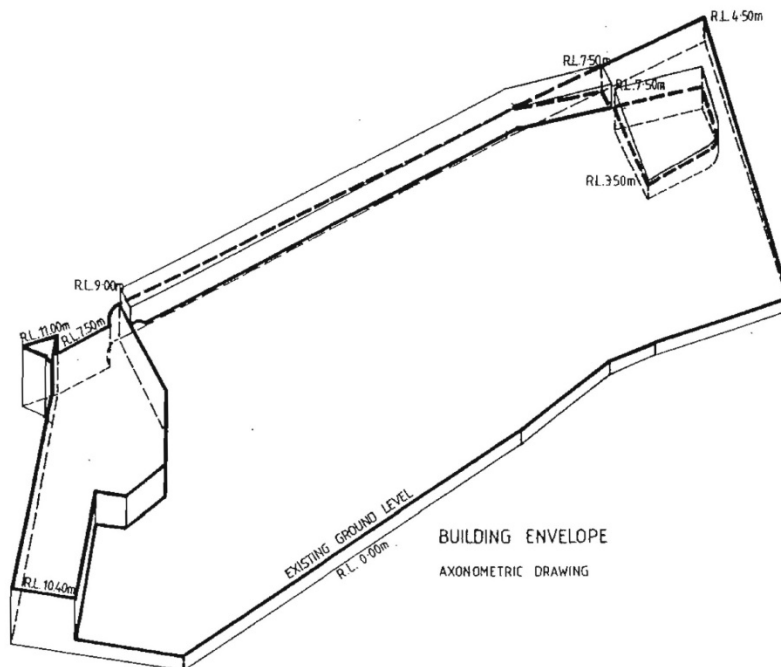
## Controls

### SEPP –

The proposal comes under a provision of SEPP (State and Regional Development) 2011 which requires any proposal that is over the minimum threshold of \$10 million to be considered a State Significant Development (SSD) and determined by the Minister for Planning based on the Secretary's Environmental Assessment Requirements.

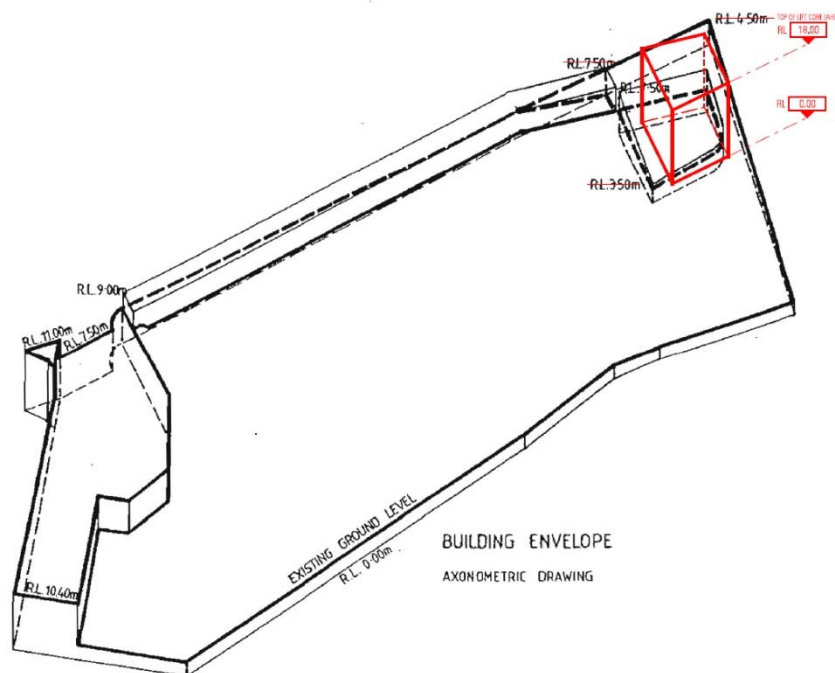
### SCRAS –

The site is affected by a height limit under the Sydney Cove Redevelopment Authority Scheme – Building Site Control drawing XVII. This indicates the maximum height of any structure beyond the heritage building. The diagram is shown below for reference. It illustrates that any structure on the northern end of the site is not to exceed an RL of 7.5m towards the west and RL 3.5 towards the east. These heights only allow for a structure of approximately 3m to the west and 0.5m on the site.



*The existing height diagram from SCRAS*





*Proposed amendment to the height diagram*

This application seeks to amend the building envelope diagram over the site to a proposed maximum height of RL 18. This is an increase in height of 10.5m to the west and 14.5m to the east.

Campbell's Stores Conservation Management Plan CMP –

The heritage guideline for development of Campbell's Stores is the Conservation Management Plan prepared by Godden Mackay Logan for Heritage Council and adopted in July 2014. The CMP recognises that the existing recent additions to Campbell's Stores (such as the covered outdoor area and the one storey pavilion) are intrusive and recommends removal or replacement with a more sympathetic structure.

The recommendation for the outdoor area is to move outdoor dining area away from the eastern façade closer to the edge of the water, to allow viewing of the eastern façade of the Campbell's Stores in its entirety.

The one storey pavilion is seen as an intrusive element and is referred to as a temporary structure. The CMP considers replacement of the temporary pavilion structure with a '*contemporary, well designed addition*' that can '*be consistent with the existing rhythm*' of the bays and could '*maintain and enhance the distinctive identity of Campbell's Stores*' recognising the established scale, and responding sympathetically to the heritage surroundings. It also mentions the use of appropriate materials, with the existing materials and colours as a point of reference.

Based on the Conservation Plan some form of a contemporary structure in place of the single storey pavilion could be acceptable; however, the CMP does not contemplate a separate building of a greater scale than the heritage building itself. Therefore, in our opinion the proposal does not meet the requirements of the Conservation Management Plan.

The proposed 'glass box' is not sympathetic to the existing materials or the established rhythm of the stores. It is a rectangular form with horizontal emphasis whereas the other bays have a vertical emphasis. Bay 12 has a flat roof that is not in keeping with the characteristic pitched roof forms along Campbell's Stores. The use of glass blocks is also uncharacteristic in the area.

The proposed building form makes a strong architectural statement next to a number of significant and already distinctive buildings. However, a new building should not seek to compete, but should be less distinctive in order to meet the guidelines of CMP.

The proposed outdoor dining area with the new awning structure only partially meets the CMP's guidelines with regards to the removal of the existing shading and masts. However, the proposed area is only 3m away from the eastern façade, which would not provide the '*generous public walkway*' which was recommended along the eastern

façade in the Conservation Management Plan. The dining area has been increased in comparison to the existing space. There is also a new dining space on the Hickson Road frontage. It is considered that the new area to Hickson Road should facilitate a reduction to the dining on the waterside to allow greater separation and additional pedestrian space and so to comply with the guidelines of the CMP.

## Urban design comments

GMU has reviewed the submitted documentation, the relevant controls and inspected the site and the surrounding area. Based on our analysis, the understanding of the desired character for the area and the urban design principles, we consider that the proposed changes to the eastern façade of Campbell's Stores are appropriate. From our urban design perspective, the only change to this part of the scheme we would suggest would be an increase to the distance between the new awning structure of the dining area and the eastern façade.

Based on our review we consider that the proposed 13m structure on the northern end of the heritage building referred to as Bay 12 is not appropriate and recommend that the structure be deleted from this proposal.

Our views on the proposed building at Bay 12 are as follows:

- Inappropriate architectural reference:

The inspiration shown in the design statement is the glass pyramid at the Louvre in Paris. However the function of this glass box and that of the *Pyramide du Louvre* are totally different. The *Pyramide du Louvre*, whilst large, is not a dominant element in comparison with the totality of the forecourt for the historic buildings. It is visually separate but at the same time, as its entry, an essential function to the Museum itself.

The proposed glass box has no direct link in terms of use or of facilitating entry to the Stores. It is an add on structure in close proximity to the Stores and it blocks and fills in one of the public domain gaps from Hickson Road to the foreshore. It should not sit alongside the heritage-listed Stores.

Further, the *Pyramide du Louvre* has real translucency at a close distance as the glass is transparent. The cube proposed here is not transparent and is made of glass blocks. It will not allow visual connection to the public domain and built form around it. It will in fact obscure the Stores and public vistas due to the density of its structure and materials.

- No purpose for the proposed new building:

A strong element such as the proposed 'glass box' needs to provide a linked purpose in terms of use. Such a significant uplift in the controls and impact to the heritage listed stores should not be contemplated for a non-essential or unknown use.

- Bay 12 should be returned to public:

The heritage material reviewed for this submission indicates that the existing heritage building was historically appreciated in the round. An addition to the northern edge was never envisaged. This space was never occupied until the construction of the temporary structure in the 1990s. This element is acknowledged as an intrusive element. There is a genuine question therefore as to whether any building should be allowed in this location, given that historically it was always part of the open space of Sydney's foreshore. In our opinion, the design principle by the applicant that the space to the north of Bay 11 should be for public use is correct. However, we do not consider that this principle is satisfied by an open undercroft. The visual connection to the foreshore from Hickson Road is going to be permanently privatized by the building and dining in the undercroft other than a small 4m gap between Bay 11 and new 'Bay 12'. The design statement claims that the undercroft of Bay 12 will provide additional visual and pedestrian connection to the foreshore area and allow for the views to the Opera House. As shown in the following photomontage, the 2.5m does not provide sufficient height to enable open views sufficient to encourage public access.

- The proposed form is intrusive:

The heritage character surrounding the site means that any new structures should not detract from the heritage significance of the foreshore or the appreciation of its heritage items. The form of the proposed building detracts from the character of the area due to its excessive height and unsympathetic proportions. The proposed height is greater than Bay 11 and the hotel, making the proposed structure the most significant building on the eastern edge of Hickson Road. The impact of the ground level undercroft to the windows of the heritage stores is also unsympathetic in terms of alignment, volume and outlook as can be also seen in the photomontage.

- Overdevelopment and limited setback to the north:

Currently the existing sequence of spaces between the buildings along the foreshore is regular with an average 20-25m separation distance. The proposed building will decrease the distance in this location to approximately 10m to the north. It will not only disturb the outlook from the Park Hyatt Hotel's balconies but also create an impression of density and scale that is not in keeping with character of the area. It will create an impression of overdevelopment by restricting the rhythm of space to built form.

- Opening of the northern façade is not successful:

It is unclear how the proposed increased ground level of the area at Bay 12 is going to be detailed at its junction with the northern façade of Bay 11. It appears to abut the existing windows and doors as is also shown in following photomontage.



*Photomontage showing the northern façade of the existing heritage building and the ground floor level abutting the windows. The image also shows that the extent of the view connection is not enough to enjoy the full view to the Opera House.*

- The impact to the existing tree:

The proposal seeks to increase the allowable height to the north of Bay 11 and construct a new building of unknown use. The applicant justifies the additional built form on the basis that it will not be seen from the water due to a large existing Fig tree.

The arborist report as part of the application indicates a Tree Protection Zone (TPZ) area requirement with a 12.8m radius. The proposed structure needs to be setback from the alignment with the eastern edge of Bay 11 by approximately 2m. It is also understood that some pruning of tree branches will be required to allow for construction of the building. The existing East West canopy spread indicated in the arborist's report is 28m diameter (14m radius). This suggests at least 4m of the tree would require pruning, significantly impacting the girth of the tree.

A detailed analysis is required to ensure that such pruning and built form proximity will not result in the loss of this tree. In our opinion any impact which could be a threat to the tree's longevity should be avoided.





*Indication of the area of the tree that will require pruning during the construction of Bay 12.*

## **Conclusion and recommendation**

GMU has reviewed the proposed SSD 7056 for the 'Remediation, Renewal and Adaptive Re-Use of Campbell's Stores'. GMU supports the proposed upgrades to the interior of the heritage building, as well as the proposed upgrades to the external dining area (with a condition to extend the public walk along the eastern façade). GMU also supports the removal of the intrusive one storey pavilion structure on the northern end of the site. However, GMU does not support the proposed additional building referred to as 'Bay 12' due to its:

- Non-compliance with the height restriction from the SCRAS;
- Unsympathetic design in terms of proportions, material and overall scale in this highly sensitive area;
- Restriction and loss of opportunity to restore generous public views to the foreshore area from Hickson Road with the removal of the existing pavilion;
- Privatisation of an area that historically was public foreshore and public domain;
- Reliance on an existing tree to screen the building from the view; and
- Possible impacts to the existing Fig tree.

GMU recommends the proposal is amended to exclude the 'glass box'.