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15th December 2015

The Secretary
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Acting Director – Key Sites

Dear Madam,

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

We write to object on heritage grounds to the above development application (DA) and request to vary the Sydney Cove Redevelopment Authority Scheme (SCRAS) submitted to the Minister for Planning by Tallawolodah Pty Ltd for proposed works to the Campbell's Stores at The Rocks.

This objection has been prepared on behalf of the owners and residents at 8 Hickson Road, The Rocks, located directly opposite the Campbell's Stores. This letter has been prepared for the Owners Corporation (Strata Plan No. 70158).

The current proposal for alterations, additions and adaptation works to Campbell's Stores, a building of Exceptional significance located on the foreshores of Sydney Cove has the potential to negatively impact on the significance of this rare, surviving 19th century warehouse building, and is considered to be inappropriate in relation to the level of significance of the place and its setting, and should not be approved.

The following is an assessment of the potential negative impacts of the principle components of the current proposal for alterations and additions to Campbell's Stores (the Stores):

1. The removal of the existing single storey northern pavilion and the erection of a new four (4) storey glass box to the north of Bay 11, referred to as the “Bay 12 building”.

Comments:

The existing northern pavilion is identified as being ‘Intrusive’ within the endorsed CMP for Campbell's Stores (GML, July 2014) and the proposed demolition of this structure will have a positive impact on the significance of the Stores and provides the opportunity to further reveal and reconstruct the northern elevation of Bay 11 (ranked as being of ‘High’ significance). The removal of this building will also reinstate the Stores building as a stand-alone building that is capable of being viewed in the round, within its maritime context on the foreshores of Sydney Cove.

The proposed construction of a new ‘glass box’ building (Bay 12) to the north of the Stores building to replace a building ranked as being ‘Intrusive’ negates all of the positive attributes of the proposed removal of the existing intrusive structure.

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The proposed construction of a new 'glass box' building (Bay 12) to the north of the Stores building to replace a building ranked as being 'Intrusive' negates all of the positive attributes of the proposed removal of the existing intrusive structure.

The proposed glass box is to be located within the defined heritage curtilage of the place and guidelines for **Policy 13** of the CMP for the place 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)

As a large, glass and steel, contemporary structure, the proposed glass box is not considered to be subservient to the primary architectural features and composition of the Stores building, which is of a strong 19th century industrial character of brick with dominant gabled roof forms. The form, scale, materials and proposed location of the new structure are at odds with the dominant architectural character of the Stores building and its setting and is considered inappropriate.

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 lessen the ability to view Campbell's Stores as a stand-alone warehouse building within its maritime setting, particularly when seen from the north, including from the northern end of Hickson Road and from the pedestrian pathway on the eastern side of the Sydney Harbour Bridge (see Photomontages 6a and 7a).

In addition, the construction of the 'glass box' involves infilling the area that currently holds the intrusive pavilion structure at ground level in order to provide a store, switch room, a lift and WCs. This new ground level structure will adjoin the northern elevation of Bay 11, covering over the ground level openings of Bay 11 on the northern elevation. Bay 11, constructed in 1895 as the Government Printers' Offices, is ranked as being of 'High' significance within the CMP (GML, 2014) and the northern elevation of this building should be reconstructed in accordance with its level of significance and revealed to public view.

The proposed 'glass box' is an ill-considered new addition to the Stores building and as the building appears to have no discernible use, a justification for its construction is unable to be assessed. The proposed new Bay 12 (glass box) does not form part of an approved interpretation strategy, nor does it form part of a re-use or cultural tourism requirement and as such does not comply with Policy 11 of the CMP (refer to below).

The proposal for the construction of Bay 12 will have a negative impact on the significance of the place and does not comply with the following conservation policies:

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 spaces.*

2. Reconfiguration and upgrade of the outdoor dining area, including removal of the awnings and non-heritage elements (e.g. boat masts) and the erection of new stand-alone canopy/shade structure along the forecourt.

Comments:

Campbell's Stores is a former maritime industrial building (warehouse) that is considered as being of 'Exceptional' significance and is a rare, surviving example of mid-nineteenth century warehousing in Sydney and the **only one of its type remaining on the foreshores of Sydney Cove**. As such, the careful and sympathetic treatment of the building's external elevations should be a primary consideration for any new works to the place.

The current proposal involves the removal of the existing awnings and canopies adjoining the eastern elevation of the Stores, the most visually prominent elevation of the place and this will have a positive impact on the significance of the place.

Unfortunately, the proposal also includes replacing these awnings with a new, stand-alone canopy/shade structure along the eastern forecourt and an additional new element: retractable vertical wind screens along the eastern edge of the forecourt. The design for the new canopy/shade structures and the new wind screens do not comply with the following conservation policy or the detailed guidelines for sympathetic, replacement structures:

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.*

Guidelines:

The existing canopy, the non-authentic ship's mast and the glazed pavilion structure in the northern forecourt should be removed. The existing canopy could be replaced with a new canopy that follows the following principles (refer to Figure 7.1):

- the position of the canopy should provide a generous gap between the canopy and building and should provide sun and rain protection from above, but should have no fixed glass or plastic pull-down sides;
- the canopy should be separated into segments to allow views to the building elevation, to allow for a better appreciation of the facade of Campbell's Stores and should be visually permeable, uncluttered and transparent;

The proposed new canopies include perforated precast concrete roofs that are neither visually permeable nor transparent and will interrupt clear views of the whole of the eastern elevation by introducing a solid, built structure running horizontally across the principal elevation of the Stores building.

Little detailed information has been provided in relation to the retractable vertical wind screens, however they are proposed to be approximately 1.8 metres in height and will therefore introduce a further element into the significant view catchment of the Stores building, cluttering the setting and obscuring views of the place.

3. Alterations to existing external openings and the introduction of new external openings.

Comments:

As stated above, Campbell's Stores is of 'Exceptional' significance and **Policy 1** of the CMP (GML, 2014) states: *The future use of Campbell's Stores should be consistent with its outstanding cultural significance, should not impact on significant fabric and spaces, and should provide for public access to the building.*

The current proposal involves alterations to three existing openings on the west elevation (Hickson Road façade) and the introduction of new openings to the original south elevation of Bay 1 and the covering over of the ground level openings to the north elevation of Bay 11 (as discussed above). The proposed works to the Hickson Road façade not only will result in widening the existing openings they will also introduce new, concrete entry portals incorporating back-lit signage (Campbell's Stores- Design Statement, JPW, p. 61).

These works should not be approved as they will have a major impact on the significance of the place, dramatically altering the character of the western elevation of the Stores building and introducing non-reversible intrusive elements into a building of 'Exceptional' significance.

As a former, maritime industrial building (warehouse), the west elevation of Campbell's Stores is a simply detailed, functional elevation that still retains its 19th century industrial character. The form, detailing and remnant original features of the west elevation of Campbell's Stores as seen from George Street and Hickson Road provides a clear understanding that this building is a former warehouse building on the foreshores of Sydney Cove.

The Hickson Road façade is the only elevation at the place that is not cluttered or obscured by later additions and features related to the current uses of the place (i.e. restaurant signage, canopy structures, the intrusive pavilion and the southern brick wall). As such, the retention and maintenance of this elevation as a simply detailed, functional elevation with no further alterations or additions is critical to the conservation of the significance of the place as a whole.

The proposal also includes the removal of the later addition brick wall adjoining the original south elevation of Bay 1, an element ranked as being of Little significance. The removal of this later addition wall will have a positive impact on the significance of the place. However, the proposal also involves the introduction of two new openings into the revealed original south elevation and the closing over of an original/early opening. This work will have a negative impact on the significance of the place, resulting in the further loss of significant, original fabric and is considered to be an unnecessary intrusion into the significant fabric of the place.

The opportunity to reconstruct the revealed original south elevation of Bay 1 has not been adopted as part of this proposal and this is considered to be an inappropriate approach to the adaptation of this building of Exceptional significance.

Likewise, although the existing, intrusive pavilion structure is to be removed, the proposal involves replacing this structure with the new Bay 12 building (glass box) with ground level amenities and services. The ground level construction will result in the covering over of the existing openings at this level on the northern elevation of Bay 11 and prohibits the reconstruction of the northern façade of this significant building.

The proposed alterations to the existing Hickson Road opening, the introduction of the new openings to the south elevation of Bay 1 and the covering over of existing openings on the north elevation of Bay 11 do not comply with the following conservation policies and guidelines:

Policy 8 *Significant fabric should be conserved using conservation processes appropriate to the assessed level of significance. Restoration and reconstruction should aim to recover or reveal significance.*

Guidelines

- Fabric identified as being of Exceptional significance (fabric up to 1885); High significance (up to 1915), and Moderate significance (1970s conservation works) should be retained and conserved.
- No conservation or maintenance work should alter or negatively impact on the elements of the external facades or internal fabric/space that have been identified as elements of high or exceptional level of significance
- The existing building fabric of Campbell's Store both internally and externally, is highly significant and in reasonable condition given the building's age and original and current function. All original and early sandstone and brickwork should be retained and appropriately conserved. No new openings or alterations should be made to the walls. Where possible the openings in the sandstone walls created in the 1970s should be blocked up to allow interpretation of the way in which the Stores originally functioned.

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.*

Guidelines

- No new openings or alterations should be made to the walls and when the opportunity arises existing, not original doorways, particularly between the Stores, should be infilled to reinstate the original spatial qualities of the Stores

Policy 22: *Signage and external lighting should have no adverse impact on significant heritage fabric and the overall character of the place.*

4. Internal alterations including forming new openings, introduction of new voids and closing over of existing openings, introduction of a new lift and stairs.

Comments

The current proposal involves the introduction of a number of new openings into the floors of the building at Level 02 within Bays 3, 5, 6, 9 and 11 and the introduction of new internal stairs and lifts into Bays 3, 6, 9 and 11. The details in relation to these works are unclear and do not acknowledge the existing voids and stairs already located within the building. Based on the significance diagrams provided within the CMP for the place (GML, 2014, pgs. 138-139) a number of openings in the floors already exist within Bays 2, 3, 5, 7, 8 and 10 and all have been ranked as being Intrusive.

The proposal does not address these existing voids 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. Again the opportunity to restore, reconstruct and/or interpret the original internal spaces has not been adopted within this proposal and this is considered an inappropriate approach to the ongoing conservation of the place.

As the original internal spaces and original internal fabric are ranked as being of 'Exceptional' significance, these works have the potential to negatively impact on the significance of the place through the further loss of significant original fabric, by confusing or obscuring the original/early internal configurations of the warehouse spaces and via the introduction of unsympathetic materials and elements.

The proposal does not comply with the following conservation policies and guidelines:

Policy 1: *The future use of Campbell's Stores should be consistent with its outstanding cultural significance, should not impact on significant fabric and spaces, and should provide for public access to the building.*

Guidelines

- Adaptation of the building's interior should ensure that the original fabric or significant architectural and spatial features are retained and interpreted as far as possible.
- The detailed requirements of the new uses should not generate undue changes to the existing fabric that cannot be reversed in the long term, or which do not respect and work within the existing architectural framework

Policy 8: *Significant fabric should be conserved using conservation processes appropriate to the assessed level of significance. Restoration and reconstruction should aim to recover or reveal significance.*

Guidelines

- Fabric identified as being of Exceptional significance (fabric up to 1885); High significance (up to 1915), and Moderate significance (1970s conservation works) should be retained and conserved.
- No conservation or maintenance work should alter or negatively impact on the elements of the external facades or internal fabric/space that have been identified as elements of high or exceptional level of significance

5. Introduction of new uses and landscaping works to the western elevation of the Stores Building (activation of Hickson Road frontage)

Comments

As discussed above, the Hickson Road frontage of Campbell's Stores is the only elevation at the place that remains visually uncluttered and relatively unaltered, retaining its simply detailed 19th century industrial character and is an important component of the overall significance of the place.

The current proposal involves the introduction of new restaurant uses to the Hickson Road façade with the aim of 'activating' the Hickson Road frontage. The proposal involves unsympathetic alterations to existing openings including new concrete entry portals with back-lit signs (as discussed above) and the introduction of chairs and tables, umbrellas and street trees. The end result will be that the Hickson Road frontage will be cluttered, visually obscured and the ability understand the original form and use of this building of 'Exceptional' significance will be further reduced. This component of the proposal for Campbell's Stores has the potential to further erode the character of the place and will negatively impact on the significance of the place as a whole.

The proposal does not comply with the following conservation policy:

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 spaces.*

6. The Sydney Opera House Buffer Zone

Comments

The new 'glass box' proposed to be constructed to the north of Campbell's Stores is to be located within the defined 'Buffer Zone' for the World Heritage Listed Sydney Opera House. As per the Management Plan for the Sydney Opera House (2005), the buffer zone is in place to ensure that any development within the buffer zone minimize the impact on views and vistas to and from the Sydney Opera House and maintains, protects and enhances views to the Sydney Opera House (Management Plan for Sydney Opera House, 2005, p. 9).

This buffer zone has been formalized within the *Sydney Regional Environmental Plan (Sydney Harbour Catchment)*, 2005 and the objectives for the zone include: "to recognise that views and vistas between the Sydney Opera House and other public places within that zone contribute to its world heritage value." (Cl. 53(2)(b), *SREP (Sydney Harbour Catchment)* 2005).

The proposed new 'glass box' will diminish available public views of the Sydney Opera House from the open space currently located between the northern end of Campbell's Stores and the southern end of the Hyatt Hotel. The documentation included with the proposal does not provide an analysis of existing views from this public space to the Sydney Opera House and what impacts there may be on these views as result of the proposed new structure in this locality.

Conclusion

Based on the our analysis of the proposal, it is considered that the proposed remediation, renewal and adaptation works to Campbell's Stores are incompatible with the heritage values and level of significance of the place and its setting.

Further, the Campbell's Stores proposal is considered to be deficient in the follow areas:

- The proposal does not comply with a large number of conservation policies contained within the Campbell's Stores Conservation Management Plan (GML, 2014)
- There is a lack of information contained within the proposal in relation to the architectural detailing proposed for the alterations to the interiors and exteriors of Campbell's Stores including the closing over of existing openings, the introduction of new openings (internal and external), the closing over of existing internal voids and the introduction of new voids, alterations to windows on the east elevation.
- There is an absence of any detailed fabric survey of the place including dating the fabric, assessing its condition and ranking all components of the place for their level of significance. Without this level of detail, a clear understanding of the potential impacts that altering the existing fabric may have on the significance of the place as a whole is unable to be gained.
- There is an absence of a views analysis with respect to the new 'glass box' addition and what impacts this will have on existing views to the Sydney Opera House from the western side of Sydney Cove.



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