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Attention – Ashley Cheong
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Submission to Campbell Stores – Remediation, restoration and adaptive re-use of Campbell's Stores, 7 – 27 Circular Quay West, The Rocks

Thank you for the opportunity to review the proposed State Significant Development (SSD15_7056) being proposed at Campbell's Stores, 7-27 Circular Quay West, The Rocks.

Hawes and Swan Planning Pty Ltd act on behalf of Park Hyatt, the owners of 7 Hickson Road, The Rocks located immediate to the north of the proposed development. Park Hyatt is a luxury Hotel which prides itself on its location, view lines and ability to blend in with iconic views of the harbour Bridge and Sydney Opera House. The proposed development is of significant interest to Park Hyatt given the impacts it may have on the operations of their business.

1.0 Executive Summary

Firstly, it is noted that Park Hyatt have no fundamental objections to the proposed works that are occurring within the building footprint of Campbell Stores and also the public domain works, however significant concerns are raised in relation to the construction of "Bay 12" which is a standalone building on the sites northern corner and its potential future uses.

It is noted that significant consultation occurred during the formulation of this development, however Park Hyatt noted they did not support Bay 12 and noted that they had particular concerns regarding design, height, potential visual impacts, protecting views and privacy, lighting and noise impacts, and the retention of public space and access to the waterfront.

Park Hyatt specifically noted that there preference was that a smaller structure (no higher than what is currently on the site) would be preferred. This would be more in keeping with the character of the Rocks and the current structures, and reduce any potential privacy and visual impact concerns for hotel guests.

This submission details those concerns and outlines the significant impacts that would occur should Bay 12 be endorsed and supported in its current format.

2.0 Proposed Works

The proposed works as described by Urbis within the Environmental Impact Statement include the following:

- Remediation - address deterioration of existing building as per agreed preservation solution including stormwater upgrades, repointing of sandstone and replacing roof slates;
- Restoration - restore/replace sandstone, internal building works to restore heritage fabric, remove existing awnings and non-heritage elements, reconfigure and upgrade outdoor dining area;
- Adaptive re-use - internal building alterations including new amenities and vertical access, improvements to western entries, construction of northern standalone building (Bay 12) and use of existing and proposed building and reconfigured outdoor dining area for restaurants, cafes and bars as per existing trading hours; and
- Subdivision - create separate strata and stratum lots.

As noted, the revitalisation and adaptive re-use of Campbell's Stores is supported given it will increase the vitality and viability of all commercial developments in that precinct. In addition, it will sustain an iconic state heritage item for the benefit of all. It also allows for the activation of Hickson Road which is currently underutilised and it will create a physical and visual connectivity from Hickson Road to the foreshore promenade.

The proposed remediation, restoration and adaptive re-use is considered to be well thought out, compatible with the area it resides in and will ensure the sandstone buildings continue to provide an iconic forefront to The Rocks from Sydney Opera House.

3.0 Concerns raised with the Construction of Bay 12

The addition of Bay 12 raises significant concern for Park Hyatt based on its height, design and view loss. As noted in the EIS submitted in support of the DA, the facade is proposed to be aligned to the Park Hyatt parapet with the top of roof matching the Hyatt fenestrations at RL17.00. At its height point, it reaches RL18.00 due to the requirement to accommodate the lift overrun.

Height

The development is subject to a number of controls, specifically under the Sydney Cove Redevelopment Authority Scheme (SCRAS) which sets permissibility and building envelope controls for The Rocks. The SCRAS sets a specific RL for the Bay 12 area under its Axonometric Building Envelope drawing of RL7.50m (Plan No. XXVII). Therefore the proposed Bay 12 structure exceeds the building envelope limit set by the SCRAS by 10.5m.

The applicant has requested that the Minister for Planning approve a variation to the SCRA Scheme by replacing the axonometric drawing for Site XXVII.

Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005 (REP) also applies to the site and provides a set of planning principles to guide development within the Sydney harbour Catchment area. Its key principles include:

- Natural assets of the catchment are to be maintained
- Development that is visible from the waterways or foreshores is to maintain, protect and enhance the unique visual qualities of Sydney Harbour
- The heritage significance of particular heritage items in and around Sydney Harbour should be recognised and conserved
- Significant fabric, settings, relics and views associated with the heritage significance of heritage items should be conserved

Comment:

- It is considered that the proposed Bay 12 structure represents a significant overdevelopment of the site and significantly breaches the height control that applies to it under the SCRAS.
- It is 10.5m above the height limit set for this specific portion of the site and is not deemed reasonable or suitable given its bulk and scale.
- The increase in height produces a box like structure that appears visually dominant and out of character with the existing heritage fabric of the surrounding buildings.
- The height of the proposed structure will block views to the western elevation of Campbell's Stores when viewed from Hickson Road.
- Based on Figure 7 of the Visual Impact Assessment prepared by Urbis, iconic views from Hickson Road will be potentially impacted by the physical structure due to its height given glimpses of the Opera House can be seen through the existing tree canopy.
- The proposed height of the glass structure detracts from the heritage precinct it sits within thus reduces the unique visual quality currently enjoyed.
- It represents an overdevelopment of the site and no details are provided which justifies its inclusion from a conservation management perspective. It is noted that JPW suggested that the regeneration of Campbell's Stores relied aesthetically and economically on the new building, however no further detail expanding on this was available for review.
- The proposed structure should be modified to acknowledge the building envelope set for the site and should have a building height of no more than RL7.50m. Alternatively, the structure could be removed and used as an informal open space area.

Design

The EIS notes that to differentiate the proposed building from the existing heritage block and surrounding brick buildings, a contemporary glass block façade is proposed. This glass block comprises range of clear, translucent and profiled blocks which are proposed to provide thermal comfort and manage acoustic and visual privacy.

Comment:

- It is considered that the glass block façade will not manage visual privacy specifically for Park Hyatt guests given the proximity of the proposed structure and its height. Urbis have noted that the separation distance between Park Hyatt and the proposed structure is 10-12m.
- The Visual Impact Assessment indicates that the proposal will have a 'moderate' visual impact due to its design and whilst Urbis note that this should not be interpreted as a negative outcome, it is considered negative from Park Hyatt's perspective as guests located on its southern wing will now look directly into this glass structure and vice versa.
- This structure substantially alters the views currently enjoyed by users of Park Hyatt because of its height and design.
- Whilst the proposed variation to SCRAS (Appendix E) notes that the proposal will avoid potential detrimental impacts on privacy and overlooking by the careful selection of materials and finishes, specifically on Park Hyatt, this is not apparent from the Design Statement which states that the building is intended to be as transparent as possible in order to contrast the existing stores building.
- The CMP prepared by Godden Mackay Logan for Campbell's Stores, notes that scope for new development is limited and that new works be confined to less significant areas and should only affect limited amounts of original fabric. Given the 'bookend' location of proposed Bay 12, its location is deemed significant and contrary to the CMP approved for the site.
- The CMP further notes that the glass pavilion at the northern end of the site is intrusive and should be removed.

View Loss

The EIS states that the visibility of the proposed exterior modifications including the new Bay 12 structure, are generally contained within the immediate context of the site (i.e. from Hickson Road, directly to the west, the foreshore promenade, and directly to the east).

The more distant views of the project are either partially obscured or the composition of the proposed modifications blend almost entirely with the surrounding built environment (i.e. close proximity of surrounding buildings, winding alignment of Hickson Road, and the mature Hills Fig tree).

It goes on to state that overall, it is considered that although the project will be a visible element from numerous viewpoints, however, it does not result in a negative or detracting visual impact to the existing streetscapes and the landscape of the setting.

Comment:

- The visual Impact Assessment clearly illustrates that the views on the south western corner of Park Hyatt will change and the western elevation of Campbell's Stores will be predominantly blocked from that view point.
- The Viewpoint shown west of Bay 12 also shows a visual impact as noted previously in that glimpses of the Opera House can be seen through the existing tree canopy, however this will be removed as a result of the Bay 12 addition.

- The proposal further negates the value of that street view by significantly reducing the view to the promenade/city sky line and sky as it creates a solid wall of glass built form.
- Additionally, Park Hyatt guests on the southern wing of the hotel ordinarily enjoy views from a number of rooms/suites along the restaurants that front Campbell's Stores. The inclusion of Bay 12 will hamper that view and outlook currently enjoyed.
- The loss of views primarily from the south western corner of Park Hyatt is considered to impact not on Park Hyatt but also on the heritage significance of Campbell's Stores due to the loss of views along its western elevation.
- View loss will also occur from the Harbour Bridge on the south western corner of Campbell's Stores which be screened from view.

4.0 Concerns Raised with the Proposed Use associated with Bay 12

The proposed commercial future uses identified in the EIS include restaurants, cafes, bars, offices etc. and all of these uses are permissible with development consent.

The EIS does states that the proposed building could be used for a luxury retail brand, however the final use will be determined at a later date and in accordance with the SCRAS and the Agreement for Lease.

Each of the proposed activities will continue to operate in accordance with the existing trading hours, as follows:

- Monday to Saturday: 6:00am to 2:00am (the following day); and
- Sunday: 6:00am to Midnight.

Comment:

- The use of Bay 12 as a bar which has the potential to operate up until 2am would have significant implications for Park Hyatt given its proximity to the southern wing rooms/suites.
- Whilst it is acknowledged that no uses are proposed as yet, any structure approved within the location of Bay 12 should be used as retail only and not involve a bar/restaurant use to ensure the amenity of surrounding uses is maintained.
- Park Hyatt regularly receive noise complaints from guests from the existing uses within Campbell's Stores and the addition of Bay 12 in its current size and scale has the potential to further exacerbate those issues unless limitations are places on its potential future uses.

5.0 Concerns Raised in relation to Construction Phasing/Timing

It is noted and confirmed by Urbis in the EIS that the more significant impacts regarding noise and construction will relate to the promenade works to be undertaken by Sydney Harbour Foreshore Authority (SHFA). The only external works occurring include the demolition and construction of Bay 12 and work on the foundations.

SHFA is proposing to undertake public domain improvement works, including the lowering of the promenade and realignment of the public foreshore access, in order to avoid the ponding of seawater which has contributed to the deterioration of the foundations and sandstone masonry walls of Campbell's Stores.

Comment:

- Park Hyatt respectfully request that both Campbell's Stores and SHFA engage proactively to discuss the issues of key concern in relation to the timing of these works and how they can be dealt with in the most appropriate way possible so there is no loss of business during those construction works.
- The realignment of the steps from Hickson Road at the southern end of the Stores to further improve pedestrian access to and from the foreshore promenade is welcomed by Park Hyatt, however further details on this and its alignment with Campbell's Stores is requested including details on materials/finishes.

6.0 Recommendation

As noted, Park Hyatt have no fundamental objections to the proposed works that are occurring within the building footprint of Campbell Stores and also the public domain works, however significant concerns are raised in relation to the construction of "Bay 12" which is a standalone building on the sites northern corner and its potential future uses.

It is our professional opinion that the proposal as submitted should not be approved in its current format and should be amended to take in to account the following:

- Proposed Bay 12 should not be supported and removed from the current application. As a minimum, should a structure be demonstrated to be required from a revenue generating conservation perspective, the height of proposed Bay 12 should be reduced to comply with the current building envelope RL7.50m.
- The design of a structure with an RL7.50m should be in keeping with the existing character and should not detract from the heritage significance of the existing building fabric within Campbell's Stores.
- View loss as a result of the height and design along the south western corner of Park Hyatt and the Harbour Bridge are not deemed acceptable and the building should be reduced in height and views maintained.
- Should Bay 12 be progressed on a smaller scale, its uses should be limited to retail only to protect adjacent users of park Hyatt.
- Park Hyatt request the continual consultation occurs in relation to the construction of the proposed works at Campbell's Stores and also the timing of the public domain works to ensure any adverse impacts are minimised.

Thank you for the opportunity to comment on this proposal. Please contact Jeremy Swan on his mobile 0438 398 079 or email at jeremy@hawesandswan.com.au to organise a meeting between parties as soon as possible.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'J.D. Swan'.

Jeremy Swan (B.Ec; Grad Dip Urban & Regional Planning (UNE))

DIRECTOR

Hawes and Swan Planning Pty Ltd