

Dr. Rupert Leong  
19 Griffin Place  
Glebe NSW 2037

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

Attn: Acting Director – Key Sites

Dear Madam,

**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)**

I write in response 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.

I am a owner of an apartment on 8 Hickson Road and would like to express my concerns about the proposed works at Campbell’s Stores. The Campbell’s Stores is a superb example of a mid-nineteenth century warehouse building, something now very rare on the foreshores of Sydney harbour. It exemplifies Sydney’s maritime history and its built heritage.

As soon as I heard about the plans to change the heritage landscape of Campbell’s Stores, I felt obliged to object to the plans to build a modern four story glass brick building. 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 new 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 Campbell’s Stores is a *State Listed Heritage item*, prominently located between the Sydney Harbour Bridge to the north, the Sydney Opera House to the east and the Bond Metcalf building to the west. It is located within the buffer zone of the Sydney Opera House, which was listed by UNESCO on 28 June 2007 as a World Heritage site under the World Heritage Convention.

The Heritage Council of NSW endorsed a Conservation Management Plan (CMP) for the Campbell’s Stores in July 2014, which is the principal guiding document for future development.

I object to the proposed development, particularly the appropriateness and design of a new four storey glass box to the north of the Campbell’s Stores. This is an intrusive and ill-conceived structure that will have negative visual impact and result in the loss of public open space. The proposed new four storey glass building is out of context, dwarfs the heritage building and will be the tallest built element along this promenade. It is located within the buffer zone of the World Heritage Listed Sydney Opera House.

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, a beautiful grassed public space with

retention of the fig tree to provide a low key recreation space for sitting, reflection and the opportunity to view the Campbell's Stores, Sydney Harbour, and history.

Besides the historical significance of Campbell's Stores I object to the proposal based on unclear, incorrect, and misleading application of the project.

- 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.
- The proposal exceeds the height restriction on the foreshore **frontage by 14.5m, more than 250% and on the Hickson Road elevation by 10.5m, or 140%.**
- The project description is misleading and confusing. It does not mention a four storey new building. Any review of planning or development controls for this historic and strategic site should be undertaken comprehensively and not in isolation.
- 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. The proposal does not comply with a large number of conservation policies contained within the endorsed Campbell's Stores CMP.
- 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 space into bars, clubs and function centres, and with late trading near residents and The Park Hyatt. 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. It will potentially cause light spill and anti-social behavior.

- Without confirmation of proposed land use, the Department cannot appropriately assess and determine the hours of operation.
- The application fails to provide any details about the various uses with the increase in tenancies from the current four (4) to thirteen (13), and does not provide an overarching Plan of Management addressing the large number of people patronising disparate restaurants and bars that considers patron management, noise and security and addresses anti-social behaviour.
- 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. The Hickson Road frontage of Campbell's Stores is the only elevation that remains visually uncluttered and relatively unaltered, retaining its simply detailed, 19th century industrial character and is an important component of the overall heritage significance of the place.
- 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 will be cluttered, visually obscured and the ability understand the original form and use of this building of 'Exceptional' heritage significance will be reduced.

- It is considered that 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.
- 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.

### **Conclusion**

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, that there should be no development to the north of the Campbell's Stores and this area dedicated as public open space for the use and enjoyment of all.

Therefore, **I object to the proposed development**, particularly the proposed new four (4) storey glass building to the north of Bay 11 and the lack of detail in the application to appropriately assess the proposed works to a State listed heritage item.

Yours sincerely,  
Dr. Rupert Leong