

20 January 2017

File Number: SSD 6751  
CoS Ref: R/2014/39/E.001

Mr Brendon Roberts  
Team Leader – Key Sites Assessments  
NSW Department of Planning and Environment  
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Sydney NSW 2000

Attention: Petra Blumkaitis  
Email: [petra.blumkaitis@planning.nsw.gov.au](mailto:petra.blumkaitis@planning.nsw.gov.au)

Dear Brendon,

**RE: Modification to Tourism and Visitor Accommodation SSD 6751 – The Sandstone Precinct, 23 – 33 & 35 – 39 Bridge Street, Sydney**

I refer to your correspondence dated 14 November 2016 and notification of the above mentioned Section 96(2) application.

The application seeks to modify the Stage 1 consent for 'The Sandstone Precinct Tourist and Visitor Accommodation' (SSD 6751). The primary purpose of the application is to facilitate detailed design development of the Stage 2 application (SSD 7484). This project is currently on public exhibition. A response to the Stage 2 proposal will be prepared by the City and forwarded to the Department in due course.

The proposed modifications to the Stage 1 development consent are summarised below:

- increase in the height of the approved Education Building envelope by 1.34m from RL 58.69 to RL 60.03
- introduction of a building envelope to the roof of the Lands Building
- amendment to the description of the development in Schedule 1 of the Stage 1 Development Consent (i.e. to amend the maximum height of the Education Building roof envelope)
- amendments to conditions A1, A4, B3, B4 and B14 in Schedule 2 of the Stage 1 Development Consent.

With exception to an increase in height of the Education Building, the City **strongly objects** to the proposal. The application lacks the adequate level of detail necessary to determine the extent of heritage impacts to the Lands Building and Special Character Area. Furthermore, a sufficient justification for amending conditions A1, A4, B3, B4 and B14 including the provision of sub-standard bicycle facilities. Accordingly, the City requests the submission of additional information for consideration as detailed in *Attachment A*.

Should you wish to speak with a Council officer about the above, please contact Michaela Briggs, Specialist Planner, on 9265 9333 or at [mbriggs1@cityofsydney.nsw.gov.au](mailto:mbriggs1@cityofsydney.nsw.gov.au).

Yours sincerely,

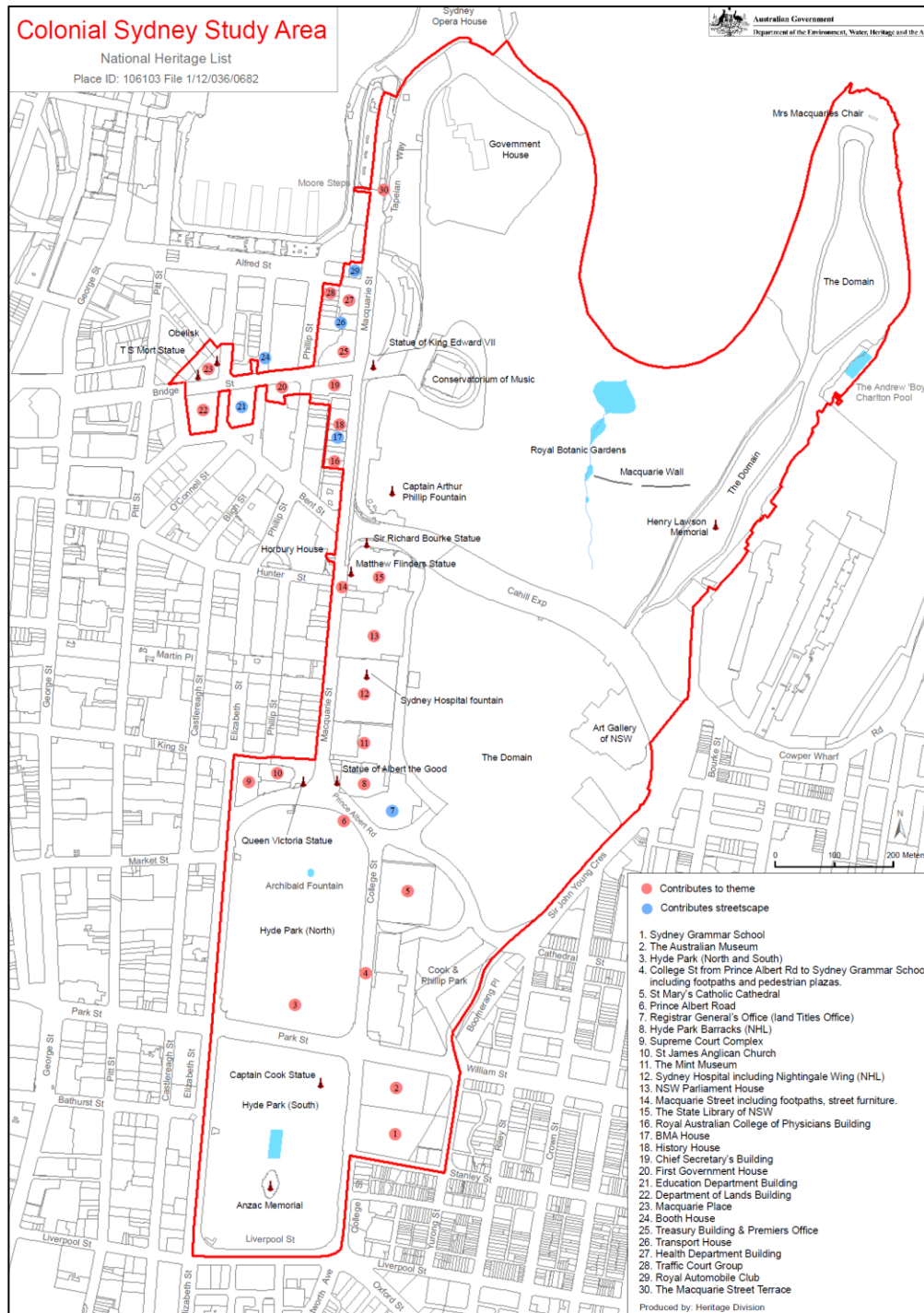
A handwritten signature in black ink, appearing to read 'C. Corradi', with a stylized flourish at the end.

**CHRISTOPHER CORRADI**  
Area Planning Manager

## Heritage Status

The Lands Department Building and the Education Department Building are of State and Local heritage significance. The buildings are in the process of assessment for their National heritage significance. They are also situated within 'Colonial Sydney', an area being reviewed by the Department of Sustainability, Environment, Water, Population and Communities for potential inclusion on the National Heritage List. It is anticipated this assessment will be completed prior to June 2017.

The map of the area under assessment is below. Macquarie Place directly opposite the Lands Department is also included in this area.



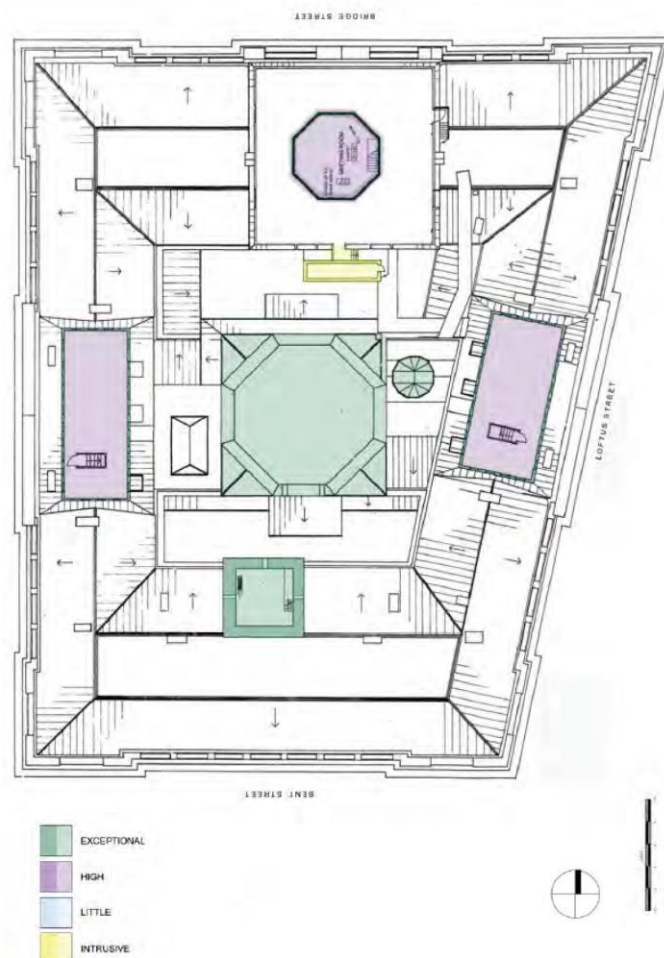
The buildings are situated within the Bridge Street /Macquarie Place/Bulletin Place Special Character Area, as defined in the SLEP 2012. The Character Statement is contained within the SDCP 2012 and should be revered in any development within this area. The buildings are also adjacent to the Farrer Place Special Character Area.

The SEARs issued for SSD 6751 required, amongst other things, a thorough assessment of the sites, building and historical associations including a revised CMP. Despite this, the application provides an insufficient amount of information to adequately assess the heritage impacts to the sites.

### **Inadequate Information**

#### *Conservation Management Plan*

- The physical analysis in relation to the perimeter roofs proposed to be demolished is insufficient. Photographs of the iron roof trusses and the roof spaces proposed to be demolished should be provided in the CMP, along with a condition analysis.
- The roof level significance diagram below (CMP Figure 4.15) does not provide a grading of significance for the roofs proposed to be removed. The roof structure, roof form, railings and roof coverings should be assessed under the NSW Heritage Council Criteria and a grading of significance included in the CMP.
- As there is no grading of significance for the perimeter roofs, it is not possible to determine the applicable policies under the heading 'Treatment of fabric of different grades of significance' on pages 132 to 133 of the CMP.



### *Heritage Impact Statement (GBA Heritage – 3 November 2016)*

- The Heritage Impact Statement (S of HI) does not adequately address the SEARS in so far that it does not explain what measures are proposed to mitigate the negative impacts of the proposed roof envelope and inherent demolition.
- There is conflicting information between the Statement of Environmental Effects (SEE) and S of HI. The SEE indicates the roof structure is in poor condition, however, page 12 of the S of HI states the '*internal iron roof structure and Douglas Fir timber lining of the existing ancillary roofs is largely intact with the exception of the area in the south west corner that was burnt in 1984. In this location the timber lining boards have been replaced. The cast iron roof cresting on the traffic cable roofs is intact.*' The structural report does not describe any issues with the existing roof structure proposed to be demolished, and does not outline any defects with the iron trusses.
- The S of HI does not assess the impact of the demolition of the perimeter roofs (inherent in the proposed roof envelope) on the significance of the building. It justifies the demolition on the grounds that they are 'aesthetically disappointing'. This is not a heritage argument. Neither the CMP nor the S of HI provide an assessment of significance of the perimeter roofs under the NSW Heritage Council Assessment Criteria. Such substantive demolition of a building of State and potentially, National significance, should not be approved without such an assessment.

### *Architectural Drawings*

- The RLs of the ridge of the existing original roofs proposed to be demolished are not included on any plans, elevations or sections. The height of the handrail has been included but this is a highly transparent element so that it does not provide a valid comparison with the height of the proposed envelope. The City has relied upon scaling to estimate that the proposed roof envelope is 1.8 to 2 metres higher than the ridge of the original roof.
- There is an insufficient number of sections through the building to understanding the inter-relationship of the proposed roof envelope with the existing roof features to be retained. Further there is no information in the Stage 2 drawings to enable an assessment of the internal heights in the proposed new roofs. Therefore, it is difficult to assess whether the proposed height of the envelope is necessary or whether it could be lowered.

### *Building Services Report*

- There is no information on the height of the proposed exhaust from the rooftop kitchen and whether this projects vertically above the proposed envelope.
- The Building Services report does not verify that no further vertical projections for plant will be required other than for the Lift to RL 38.70.

### *Structural Report*

- The Structural report does not provide any detail on the proposed new steel framed lightweight floor system except that it will comprise steel beams and steel floor joists to be constructed above the existing steel and brick arch ceiling of level 2, and that this new steel floor system will also support the loads imposed by the new steel roof. Such a major alteration to the building should

only be assessed with adequate level of structural detail, showing the depth of structure required and details such as perimeter drainage.

#### *View Analysis*

- The resolution and clarity of the images in the view analysis is poor and it is not possible to zoom in to obtain greater clarity. The images are over exposed such so that the proposed roof merges into the sky background.
- The view point from Macquarie Place is conveniently covered by trees, whereas there are alternate view points in the park without a tree canopy obscuring the building.
- The view analysis is not according to the NSW Land and Environment Court guidelines set out in:  
<http://www.lec.justice.nsw.gov.au/pages/search.aspx?k=photomontages>

The following are the Land and Environment Court's requirements for photomontages:

Any photomontage proposed to be relied on in an expert report or as demonstrating an expert opinion as an accurate depiction of some intended future change to the present physical position concerning an identified location is to be accompanied by:

#### Existing Photograph

- a) A photograph showing the current, unchanged view of the location depicted in the photomontage from the same viewing point as that of the photomontage (the existing photograph);
- b) A copy of the existing photograph with the wire frame lines depicted so as to demonstrate the data from which the photomontage has been constructed. The wire frame overlay represents the existing surveyed elements which correspond with the same elements in the existing photograph; and
- c) A 2D plan showing the location of the camera and target point that corresponds to the same location the existing photograph was taken.

#### Survey data

- d) Confirmation that accurate 2D/3D survey data has been used to prepare the Photomontages. This is to include confirmation that survey data was used:
  - i. for depiction of existing buildings or existing elements as shown in the wire frame; and
  - ii. to establish an accurate camera location and RL of the camera.

Any expert statement or other document demonstrating an expert opinion that proposes to rely on a photomontage is to include details of:

- a) The name and qualifications of the surveyor who prepared the survey information from which the underlying data for the wire frame from which the photomontage was derived was obtained; and
- b) The camera type and field of view of the lens used for the purpose of the photograph in (1)(a) from which the photomontage has been derived.

It is considered appropriate that a significant development of this nature comply with the Court's directions, which represent best practice in this area. The view analysis prepared by the proponent requires further scrutiny in the light of these directions. Additional view-points (consistent with those provided in these comments), greater

clarity and image resolution are required to obtain an accurate depiction of intended future change.

### **Lands Building Envelope**

Inherent in the proposed envelope is the demolition of the roof structure. However, insufficient information has been provided to assess the heritage impacts of the proposed demolition. As stated previously, the S of HI does not assess the impact of the demolition of the perimeter roofs (inherent in the proposed roof envelope) on the significance of the building. It justifies the demolition on the grounds that the perimeter roofs are 'aesthetically disappointing'. Neither the CMP nor the S of HI provide an assessment of significance of the perimeter roofs under the NSW Heritage Council Assessment Criteria. Such substantive demolition of a building of State and potentially, National significance, should not be approved without such an assessment.

The original perimeter roofs of the Lands Building were intentionally designed to be subsidiary in their nature and their scale so as to afford visual prominence and primacy to the major roof features and to the facades. This was a common architectural device of the Victorian Italianate style, of which the Lands Department is one of the most significant examples remaining in Sydney. They are not 'aesthetically disappointing', but rather they form part of a carefully choreographed hierarchy of forms that express the hierarchy of historic functions within the building.

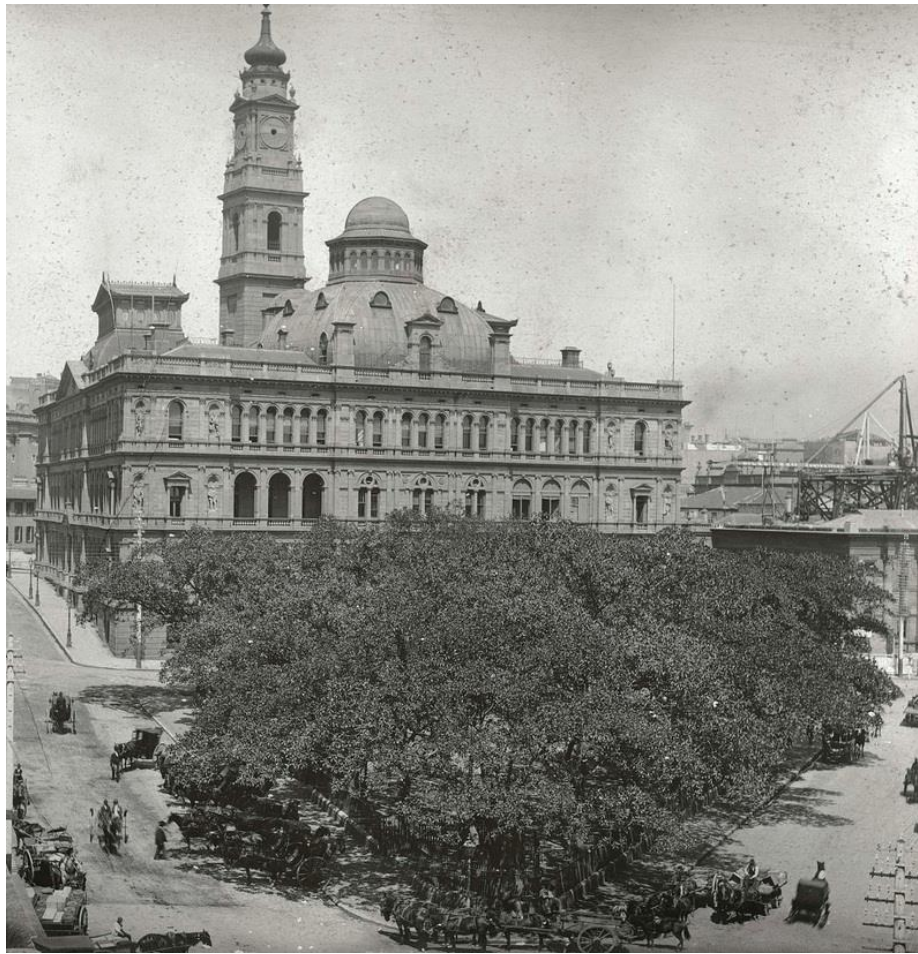
The City disagrees that 'the subject buildings were originally designed to only be seen from low level but views of their roofscapes are now readily available from the surrounding development' (S of HI, Page 6) The steeply rising land levels of Bridge and Bent Streets have always provided level views to the roofscape of the Lands Department building and these have always been significant views within the streetscapes of Bridge Street, Macquarie Place, Farrer Place, and Bent Street and Spring Street, as well as from Sydney Harbour, the Macquarie St ridge and the Rocks Ridge, particularly prior to the construction of the Education as evident in the image below from Bridge Street, and in the image from Loftus Street further below of the building above a reduced tree canopy in 1928.







The image below of an elevated view from a warehouse at the Quay in 1900 shows the primacy of the facades, the towers and the domes:



### *Visual Impact Statement*

The SEE states that 'the images within the Visual Impact Statement demonstrate that the proposed modifications to the roof envelopes retain the existing important views from the public domain at street level to the most significant and highly utilised public domain spaces in close proximity to the site; and retain and do not affect existing public domain views to key places'.

Whilst the City agrees that the proposed envelope will have only minimal impact upon views of the roof features from Bridge Street, Loftus Street and Macquarie Place, the same is not the case in views from Bent Street and Farrer Place. In these views, the proposal will obscure views of the octagonal base of the central dome and the southern mansard roof of the eastern tempietti dome, and reduce the apparent height of the southern clock tower. This is more apparent in our view analysis from Bent Street and Farrer Place over page, which uses higher resolution image than the Visual Impact Statement. The proposed envelope requires further consideration in the south-eastern corner to ameliorate adverse impacts on views to the building from the public domain of Bent Street and Farrer Place and enhance significant views to the Lands Department consistent with the SDGP 2012 objectives for the Farrer Place Special Character Area (Clause 2.1.13(g)).



**View Analysis:** Bent Street and Farrer Place. From views in Bent Street and Farrer Place, the proposal will obscure views of the octagonal base of the central dome and the southern mansard roof of the eastern tempietti dome, and reduce the visual prominence of the southern clock tower.

### *Stage 1 and Stage 2 building envelopes*

Concern is raised that the proposed envelope comprises rectangular cubic forms that are greater in bulk than the proposed Stage 2 design. The Stage 1 cubic forms have a brutal juxtaposition with the curved forms of the rooftop towers and domes whereas the Stage 2 design provides a more sympathetic juxtaposition that carefully visually separates the original and the proposed forms. The Stage 1 cubic forms also potentially permit substantive service projections for which further modifications to the original consent should be required. It is therefore suggested that the Stage 1 envelope should be aligned to the Stage 2 design, closely reflecting both the form of the Stage 2 design as well as the level of transparency, such as the northeast terrace.

Notwithstanding the above concerns the City is supportive of a means of providing habitable spaces in a series of contemporary roof forms that link the significant rooftop structures and invigorate these structures for use as hotel function spaces, provided that the hierarchy of the roof scape is maintained and the perimeter roofs remain visually subservient.

### **Education building**

The proposed modifications to the Stage 1 Development Consent for the Education Building comprise an increase in the height of the approved Education Building envelope by 1.34m from RL 58.69 to RL 60.03, being the existing height of the uppermost structure of the building;

The height increase to the Education Building Envelope is marginal and unlikely to cause any noticeable difference to the appearance of the proposed addition in terms of its composition, architectural style, form and features. The scale relationship with the base building which was established by the original approval will be also unaffected.

### **Condition B3 – Internal Works**

Given the potential National heritage listing of the Lands and Education Building, the proposal to diminish the requirements of Condition B3 is not supported. Consultation with the NSW Heritage Council is imperative in ensuring any necessary upgrades are undertaken in a manner that minimises impacts to significant heritage fabric.

### **Condition B4 – Heritage and Archaeology**

The proposed wording of Condition B4 technically absolves the proponent from complying with the updated CMP at Stage 2 or obtaining endorsement for the CMP from the NSW Heritage Council and City of Sydney. In this regard, the extent of amendment supported by the City is as follows:

***The future Stage 2 development applications for the Department of Education and the Lands Building ~~shall comply with the endorsed~~ are to be accompanied by updated*** Conservation Management Plans for the Department of Education Building ~~prepared by City Plan Heritage dated March 2015~~ and the Lands Building ~~prepared by the NSW Government Architect's Office dated March 2015~~ ***that have been principally prepared to guide the adaptive reuse of the buildings. These updated Conservation Management Plans are to be endorsed by NSW Heritage Council, or delegate, and by the City of Sydney prior to any approval of the Stage 2 consent for these buildings.***

**Condition B14 – Traffic and Transport**

The EIS provides an inadequate justification as to why the site cannot achieve compliance with Section 3.11.3 of the DCP and how the proponent arrived at a maximum provision of 60 bicycle spaces. The City has undertaken a preliminary calculation consistent with the requirements of the DCP, which indicates a further 42 spaces are necessary to adequately service the site.

In order to accurately determine bicycle parking and EOTF requirements, further information should be provided detailing the distribution of GFA across the various land uses and clarification as to whether the estimated staff numbers are inclusive of the retail, hotel and ballroom areas.

Notwithstanding the above request, Council objects to the modification of Condition B14 as it cannot endorse the provision of a sub-standard bicycle facility that fails to adhere to Council's DCP requirements and Australian Standards.