



Our Ref: DOC18/276144

Mr Andy Nixey
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Dear Mr Nixey

RE: Concept Development Application (Staged Development) for alterations and additions to the Intercontinental Hotel and Transport House – Response to Submissions (SSD 7693)

Thank you for your invitation dated 4 May 2018 to comment on the Response to Submissions (RtS) Report for State Significant Development SSD 7693 for the Concept Development Application (Staged Development) for alterations and additions to the Intercontinental Hotel and Transport House.

The proposal impacts on two heritage listed properties including the Intercontinental Hotel located at 115-119 Macquarie Street, Sydney, which contains the former Treasury Building identified as a *State Heritage Register* (SHR) listed item under *NSW Heritage Act 1977* (Item 00355), and Transport House located at 99 Macquarie Street, Sydney, which is locally listed under Schedule 5 of the *Sydney Local Environmental Plan (LEP) 2012*. Transport House has also been nominated for listing on the *State Heritage Register*.

The proposal is in the vicinity of several SHR listed items, including First Government House at 41 Bridge Street, Sydney (SHR No 01309), Conservatorium of Music, Macquarie Street, Sydney (SHR No 01849), Justice and Police Museum at 4-8 Phillip Street, Sydney (SHR no 00673), Former Chief Secretary's Building at 121 Macquarie Street, Sydney (SHR No 00766), Royal Botanic Gardens and Domain (SHR No 01070). The proposal impacts on the *Governors Domain and Civic Precinct*, a draft Study Area under assessment for National heritage listing that includes all these sites.

The RtS Report, prepared by BBC Consulting planners, dated May 2018, including the following appendices, has been reviewed:

- Appendix 2: Response to heritage issues prepared by URBIS
- Appendix 4: Drawings prepared by Hassell, dated March 2018
- Appendix 5A: Visual Impact Assessment, prepared by Hassell
- Appendix 6A: Structural Engineer's Assessment prepared by Arup
- Appendix 6C: Peer Review of Arup's Structural Engineers' Assessment prepared by Mott MacDonald.
- Appendix 9: Updated Photomontages

Based on this, the following comments are provided:

- It is noted that the current proposal is based on a CMP which has not been endorsed by the Heritage Council. The CMP (issue Draft 3 dated 16 January 2017) prepared by Urbis, is being reviewed by the Heritage Division for Heritage Council endorsement concurrently to the SSD application assessment. The Heritage Division has reviewed the Draft CMP and provided comments in the form of a CMP review checklist to URBIS in December 2017. The Heritage Division is not in receipt of a revised CMP that adequately addresses the checklist comments.

The CMP checklist has identified a number of issues and policies that need to be addressed satisfactorily to guide any future development on site. In addition to the revision of significance gradings, additional analysis on the cortile spaces and its views and changes to relevant policies relating to the 1980s fabric and the policies on interpretation, the CMP is required to include an appropriate policy and a plan to illustrate the non-development roof zones that protects the former Treasury Buildings in appreciation of its significant roof configuration.

It is preferable that the CMP be endorsed by the Heritage Council prior to the determination of the Stage 1 SSD application and the overall concept and the final detail design proposal be formulated in accordance with the policies and guidelines of the endorsed CMP. If that is not possible due to the SSD timeframe, the concept proposal should be formulated in accordance with the draft CMP policies as amended by the comments made in the CMP checklist to ensure that the state significant values of the Treasury Buildings are protected and its contribution to the significant streetscapes of Macquarie and Bridge Streets and adjacent precincts is maintained and enhanced.

- The Heritage Division's submission dated 27 October 2017 had raised concerns regarding the visual impacts posed by the scale and form of the rooftop additions to the 1980s podium building and advised further reconsideration and reduction of these additions.

The RtS report states that the proposal has been amended to address these impacts, and the proposed plant enclosure on top of the Bridge Street portion of the former Treasury buildings has been removed and relocated to the east side. These amendments are supported as they would maintain the subject site's relationship with Bridge Street and First Government House. The amendments would maintain the 10m setback from the Bridge Street frontage which would also comply with the Sydney Development Control Plan (SDCP) 2012 setback controls along Bridge Street.

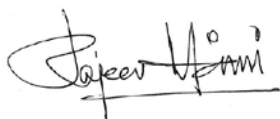
It is, however, noted that the bulk of proposed rooftop addition behind the 1890s Treasury Building northern wing extension (Strong Room Building and Link Building) remains unchanged in the revised proposal. These additions would have a major adverse impact on significant views to the site (as identified in the Draft CMP) from several State Heritage items in the vicinity including Royal Botanic Gardens, the Sydney Conservatorium of Music and First Government House Site. Furthermore, these additions would not meet the SDCP 2012 minimum upper setback requirements from the Macquarie Street frontage of 30m and would encroach onto the existing setback between the later 1980s hotel development and 1890s Treasury Building northern wing extension, also impacting on the northern view above from the cortile spaces and the former Treasury Building Atrium.

It is, therefore, reiterated that the scale and bulk of the above noted rooftop addition be reconsidered and reduced to minimise visual impacts. These additions should be amended to comply with the SDCP 2012 setback requirements from Macquarie Street frontage to protect the heritage values and setting of the Treasury Buildings and the Macquarie Streetscape within the low-scale historic precinct.

- The Heritage Division's submission had advised that documentary evidence be provided by a Structural Engineer, with experience in heritage buildings, confirming that the existing Transport House building is capable of withstanding the proposed works. The RtS report includes a *Structural Engineer's Assessment* prepared by Arup and a *Peer Review of Arup's Structural Engineers' Assessment* prepared by Mott MacDonald. It is noted that the building would require strengthening in terms of *full-height bracing* to minimise risk associated with the proposed extension work which could potentially have an adverse impact on significant heritage fabric and spaces and views to the building. Any amended application must be accompanied by a rigorous analysis and heritage assessment supporting a preferred option for strengthening the building.
- The Heritage Division's submission had recommended close consultation with City of Sydney council to mitigate impacts to local heritage items, urban design and visual amenities associated with the proposal. It is noted the Council has raised significant concerns regarding the major adverse impacts posed by the proposal on items of National, State and Local heritage significance that remain unaddressed by the revised proposal. Major issues raised by the Council including, but not limited to, inadequate setbacks, heights and treatment of the rooftop additions should be resolved and optimal outcomes negotiated.

The Heritage Division would be happy to review any amended proposal and documentation that may address the likely heritage impacts posed by the Stage 1 SSD application. If you have any questions regarding the above advice, please contact Shikha Jhaldiyal, Senior Heritage Assessment Officer at the Heritage Division, Office of Environment and Heritage, via email shikha.jhaldiyal@environment.nsw.gov.au or by telephone: on 02 9873 8545.

Yours sincerely



Rajeev Maini
Acting Director, Heritage Operations
Heritage Division
Office of Environment and Heritage
AS A DELEGATE OF NSW HERITAGE COUNCIL
24 May 2018