

13th February 2017

Dear Sirs

## REDEVELOPMENT OF HARBOURSIDE SHOPPING CENTRE SSD 16\_7874

I would like to lodge a formal object to this proposal on the grounds that the scale, massing and nature of the development have an unacceptable impact both on the visual setting of the Pyrmont Bridge but, more importantly, will have a deleterious effect on the character and original planning intent of Darling Harbour.

My key concerns in relation to this submission are:

- An inadequate heritage impact assessment which fails to address its own key objectives, omits key historical information and relevant heritage impacts, does not comply with professional best practice as set out in the Burra Charter, and deals with issues such as **community benefit** and **design excellence** (scale, character etc) in a cursory and derisory way
- the **scale of the podium level** which is very much higher than the existing complex and will have a major impact on the character and amenity of Darling Harbour, on the Pyrmont Bridge and on nearby buildings (fig 10).
- the **lack of justification** for a residential tower at all in this area, let alone one of this size and scale, and the long term impact of this on services, public realm, neighbourhood amenity, and by establishing a precedent that will substantially change the character of Pyrmont and this part of Darling Harbour
- the impact on **the vision for Sydney as a global city** - which requires the city to maintain a distinctive identity. In the case of Sydney, the relationship with the harbour is critical to this identity. **By locating tall buildings and dense urban development along the very edges of the most visited part of the harbour there is a real risk that this special relationship will be lost.**
- the failure to comply with the NSW State Government's own best practice guidance in relation to heritage, to urban development and to design, and to SEARS requirements. Whilst SSD need not comply with the State Government's own guidelines, it is appropriate that the State Government should demonstrate best practice through abiding by guidelines that it expects others to follow.

In particular:

### IMPACT ON HISTORIC ENVIRONMENT

1. The proposal will have an unacceptable impact on the setting of the listed Pyrmont Bridge. This is confirmed in the Heritage Impact Assessment which notes that:

*The introduction of a tower adjacent to Pyrmont Bridge will visually impact, in terms of increasing the obstruction of direct views to the bridge from the western boundary of the site, some south-west locations within the site and other surrounding areas (p41)*

The historic environment of Darling Harbour can be rightfully considered to include not just the Pyrmont Bridge and its approaches, but the relationship between the former industrial land and the harbour, and the 20th century concept of Darling Harbour as a place for public enjoyment and tourism. Although 4 buildings have been demolished on this site and another 17 nearby, Pyrmont itself retains a range of historic structures. Darling Harbour both transitions to Pyrmont, but also has a character and distinctiveness of its own as a 20th century precinct.

As the Heritage Council notes on p 38 of its guidance on new development (see below),

*“understanding and being sympathetic to heritage buildings, materials and settings does not prevent good modern architecture. In fact it demands it”*

The bulk and height of the podium development, the existence of the tower in any of the three locations, the scale, materials and massing of the new developments, and in particular the way they crowd and rise up from the already ‘canalised’ harbour, are unworthy of Sydney as a global city and Darling Harbour as an exciting urban precinct of character. They will also diminish the presence and setting of Pyrmont Bridge.

## INADEQUATE HERITAGE IMPACT ASSESSMENT

In relation to the SEARS requirement for a Heritage Impact Assessment, and in accordance with the supplementary Heritage Requirement from the Heritage Council (which can be found in the original SEARS requirement but which was accidentally omitted from the requirements listed on exhibition):

2. Mirvac have not addressed the Secretary’s General Assessment Requirements (SEARS) in relation to the following specific heritage requirement:

The ***Heritage Council Guideline Design in Context - guidelines for infill development in the Historic Environment***, on the ground that the new proposal does not comply with the requirements that:

- *New development...adjacent to a heritage item should aim to maintain and enhance the areas distinctive identity and sense of place.*
- *In particular this should address ...character, scale, form, siting, materials and colour and detailing.*

The proposal also does not comply with the Burra Charter, under whose guidelines heritage professionals operate and which notes that,

*Conservation requires the retention of an appropriate visual setting and other relationships that contribute to the cultural significance of the place. new construction, demolition, intrusions or other changes which would adversely affect the setting or relationships are not appropriate (Article 8)*

3. Mirvac have not complied with the policies (which presumably have been endorsed by the State Government) in the ***Conservation Plan for Pyrmont bridge*** which specifies that (future development should):

*Policy 5.4 Ensure that an appropriate visual setting is maintained for the Pyrmont Bridge, and that the bridge itself contributes to the character of Darling Harbour as a whole*

*Policy 10.0 Ensure that new works do not  
\* detract visually from the bridge or its harbour setting*

4. Mirvac have submitted an ***incomplete Heritage Impact Statement***, on the basis that the document provided does not address its own stated first objective (5) - to address the proposed development's impact on

*"the overall significance of Darling Harbour within its broader setting"*

The report did not address the original concept for Darling Harbour, its vision and purposes, or how it has evolved, nor did it address current visions for the precinct.

The original planning consideration and framework was as a precinct for people with open space and highly accessible and varied leisure activities. By omitting the 20th century history of the precinct it makes it impossible to assess the overall significance within its broader setting. As many of the concerns relating to the proposal centre on the impact on the precinct, this is a major omission.

5. SEARS information adequately addressing the issues raised by the Heritage Council of NSW in the **supplementary** email (which was accidentally omitted from the list of SEARS requirements on exhibition).

Specifically this asked for a SOHI that addresses:

- a) Visual impact assessment, noting the general existing scale of development on Darling Harbour's western side;*
- b) Visual impact assessment, noting the generally stepped development on Darling Harbour's western side, particularly close and adjacent to Pyrmont Bridge;*
- c) Scale relative to Pyrmont Bridge's height, such that this heritage item is not dominated by adjacent new development;*
- d) Setback of any new development from Pyrmont Bridge, such that views of the bridge's approaches, span, supporting structure on the western side of Pyrmont Bridge and road / pedestrian approaches are conserved and not dominated by new, close development.*

*The EIS and SOHI should both address the principles in:  
Heritage Council Guideline on Heritage Curtilages, 1996 (Heritage Office, Dept. of Urban Affairs & Planning); and Heritage Council Guideline, Design in Context – guidelines for infill development in the Historic Environment, Heritage Office/RAIA, 2005 (particularly case studies 9 and 10 – Urban contexts).*

The case studies (see fig 11) present a clear example of how new design can work in the historic environment, and a helpful matrix showing how character, scale, form, siting, materials & colours and detailing can be developed so as to respond to and complement the existing character of the place, rather than to diminish existing structures.

5. **Cumulative loss** of historic distinctiveness and character

The HIS helpfully notes that the Pyrmont bridge is the one remaining historic feature in this area, and listed another 4 items in the area that had been demolished, and 17 items nearby that had been demolished. The net result is that Darling Harbour struggles to present what little remains of its maritime character and distinctiveness.

As well as the loss of distinctive historic features, there has been a significant impact on the setting of the few remaining historic buildings. The listed Goldsborough building has

now been completely isolated from Darling Harbour and is no longer visible from the water (see Figs 6 & 7).

The new podium retail development will crowd the waterfront, creating, with the new Convention Centre and other developments, a wall of new build at the waters' edge.

## 6. **Canalisation of Darling Harbour**

A comparison between the 1822 map of Sydney and the present configuration of Darling Harbour demonstrates that there has been extensive encroachment on, and in effect 'canalisation' of the water body.

Whilst the new development does not further extend this, it involves high density development very close to the waters' edge, with no new green space at ground level. The pressure to further make use of pontoons and other floating facilities will be huge, and the construction of very tall buildings in close proximity to the waters' edge

***The revised proposal should include an updated Heritage Impact Statement which adequately addresses the impact on the character of Darling Harbour, includes a more professional assessment of the impact of the development on Pyrmont Bridge and its approaches (as requested) particularly in regard to design issues such as scale, massing, proximity and materials, and also includes an updated more professional community impact statement. It should specifically address the history and intention of the original creation of Darling Harbour and how any revised proposal will address this.***

## **FAILURE TO ADDRESS SEARS REQUIREMENTS**

### 7. Mirvac have not addressed the SEARS requirement to demonstrate **public benefit**

The SEARS requirement is that

*'the EIS shall address the provisions of public benefit, services, infrastructure and any relevant contribution requirements to be agreed with SHFA'*

The inadequate HIS has a note on community benefit but this does not in any way address the wider public benefit or services - nor does it make note of any relevant contribution.

### 8. Mirvac has not addressed the **SEARS requirement** that the EIS shall provide

*a detailed heritage impact statement (HIS) that identifies and addresses the impacts of the proposal on the heritage significance of the site and adjacent area, including any built and landscape heritage items, conservation areas, views or settings, and in particular the impact on the State heritage listed Pyrmont Bridge*

on the basis that the HIS provided does not adequately address this issue particularly in relation to the Design Guidelines, in relation to character, form, siting, materials, colour and detailing.

### 9. Mirvac have not complied with the original SEARS which referred to an **office tower**

Documentation for the original SEARS referred to an office tower. Objectors suggested that this was a 'shroud' for a residential tower. This has now become apparent.

In the current property market there is likely to be an oversupply of residential property, and it is difficult to see the need or justification for this.

## **URBAN DESIGN ISSUES - context, character, built form, density & landscaping**

9. The proposal does not address the ***Infrastructure NSW SICEEP Urban Design and Public Realm*** guidelines in relation to appropriate building height, alignment, form grain and massing, the local area, and in particular responding to adjacent items of heritage significance, and protecting and reinforcing views of significant heritage buildings.

Nor does it address these guidelines in terms of loss of solar access to the public realm, or preventing loss of privacy.

10. The proposal for a tower does not comply with the **NSW Planning & Environment Apartment Design Guide (2015)** including:

### **Principle 1: Context and Neighbourhood character**

The proposal for a tower and higher shopping precinct does not relate to the context. In particular a 9 storey retail precinct and a 166m tower do not address the character of Darling Harbour as an area for leisure and open air enjoyment, or as a tourist precinct and area for public purposes.

### **Principle 2: Built form and scale**

The scale of both the retail facility and the tower do not achieve scale, bulk or height appropriate to the existing or desired future character of the area.

### **Principle 3: Density**

The huge increase in residential density is not matched by related facilities including community facilities, or green open space.

### **Principle 5: Landscape**

Some roof top planing does not comply with principle 5 in relation to landscaping which should optimise usability, privacy and opportunities for social interaction and should also respect neighbours amenity.

In relation to tower apartments the guidelines note on p 18 that these are *suited to central business districts* - this part of Darling Harbour is separate from the CBD. Tower apartments also need to consider wind, overshadowing and visual impacts on surrounding properties and the public domain.

Darling Harbour Precinct was envisaged as an area for leisure and enjoyment rather than for dense urban development, and there is no requirement for a *strong vertical form or landmark* in this area as set out in the guidelines.

In relation to neighbouring properties, the Design Guide notes that:

*....new development should assist in providing residential amenity including visual and acoustic privacy, natural ventilation, sunlight and daylight access and outlook (p36)*

*...provide suitable areas for communal open spaces, deep soil zones and landscaping*

*...building separation should be increased in proportion to height to achieve amenity and privacy for building occupants and a desirable urban form (37)*

Note also that the figures demonstrate that the concept proposals have been artificially rendered to minimise the visual impact, scale and setting of the buildings. Note the contrast between the new tower by the convention centre as built and the rendering (see figures 3 & 4)

***The revised proposal should demonstrate how the above NSW State Government guidance has been taken into account, through revised design which is more appropriate in terms of context, built form and scale, density and landscaping.***

## **TRAFFIC AND ACOUSTIC PRIVACY**

12. The submission does not address **traffic increases, acoustic privacy and olfactory impact**

This is currently a noisy route used for delivering that brings heavy traffic into residential neighbourhoods. An (equivalent to) almost 9 storey retail facility and 166m apartment block will inevitably result in a massive increase in traffic to this route. This will have a direct impact on the acoustic privacy, natural ventilation and amenity of neighbouring properties.

There is already considerable noise from recycling of glass, and deliveries, and smell from ventilation stacks from food and beverage businesses.

***The proposals should include clear evidence for how noise from recycling and deliveries will be reduced.***

## **REAR ELEVATION and ACTIVATION OF DARLING DRIVE**

12. The submission does not adequately address the activation of Darling Drive

As noted, Darling Drive is already a busy through route, with considerable delivery traffic. There is some pedestrian access but it is limited. In effect Darling Drive acts as a barrier between Pyrmont and Darling Harbour, with almost no street level connection. Streets to the west of Darling Harbour are overshadowed by over passes.

High level walkways simply serve to bury the street level even further, making street level in effect a no go area for pedestrians.

***If the proposal is to create any link between Pyrmont and Darling Harbour there should be a conscious activation of Darling Drive, with street level pedestrian access, shops and walkways.***

13. Rear elevation of the new shopping centre is not addressed including requirement for kitchen ventilation and deliveries

The new shopping complex will be nearly 9 stories high. The drawings show some 'greenery' on the top surfaces. No details have been provided of the west elevation facing Darling Drive, nor have details been provided of the location of ventilation fans.

The current shopping centre already has noisy fans, a poor rear elevation, and there is considerable nuisance from kitchen fans which are not always properly serviced.

***The submission should provide further information relating to the rear elevation, and the location of building services in relation to neighbouring properties.***

## **BREACH OF PURPOSES OF THE LEASE**

12. The proposal may possibly breach the requirements of the lease for the Harbourside Shopping Centre

I understand that the original use lease allows for permitted use as follows (6.1)

*used as a harbourside festival market (which shall include) retail, restaurant, tavern, entertainment and refreshment complex*

***In responses could you please confirm the original purposes set out in the Harbourside Shopping Centre lease and whether or not this proposed development complies with them.***

## **ASSURANCES IN REGARD TO POST-APPROVAL VARIATIONS**

14. There is no certainty that (even if acceptable) the current design or even building envelopes will be respected as the development progresses

The Barangaroo Project has demonstrated that concept designs can be and are regularly varied without effective consultation once consent has been granted. Many other projects demonstrate that the architect responsible for the concept design is often not the architect appointed to oversee the new build.

Whilst there is no justification for the tower, and the design is bland and features the 'rounded corners' that are currently seen on other buildings of a similar date, there are some qualities in the FJMT design (particularly if it were to be a smaller structure at a more appropriate scale).

***Mirvac should provide guarantees that FJMT will be retained in the future project, and that there will be no increase in the already unacceptable height and scale of development in the future.***

## **ACQUISITION OF LEASE WITHOUT TENDER & ITS IMPLICATIONS**

13. The proposal appears to allow for the acquisition of the Harbourside lease (and potentially that of 50 Murray St) without public tender or auction.

The lease for Harbourside Shopping Centre and indeed 50 Murray St are both owned by the NSW State Government through Property NSW (Formerly SHFA). I understand that the redevelopment proposal is 'unsolicited' which could suggest that Mirivac would be able to acquire the lease without tender.

It would be immensely helpful if you could clarify whether this is the case, or whether Property NSW will retain the head lease for both properties.

***If the development does proceed, assurances should be given as to the retention of the lease by Property NSW in order to allow for the future careful management of this area.***

There is huge potential for the services (waste, ventilation, recycling) associated with the massive increase in the podium development and the new residential tower, to impact on neighbouring developments. Many of these are dealt with currently by the leaseholder.

***If the development does proceed, assurances should be given that a legally binding management agreement will be developed and subject to consultation, setting out binding management policies for the shopping centre and tower, particularly in relation to smell, noise, ventilation, rubbish removal, traffic, construction and repair and other activities. This should be prepared and agreed by Mirvac prior to the completion of the project. If the lease is to be sold, the management agreement should be prepared and agreed prior to any sale by public tender or at auction.***

The option of choosing between different tower locations appears to be offered as a way of distracting public attention from the lack of justification for a residential tower of this size and scale at all.

That being said, **if there is a demonstrable need and justification for the provision of additional apartments** in an area previously assigned to leisure and tourism, it should be as close as possible to the existing tower (the southern option), in order to minimise the impact of on the rest of the precinct.

Yours sincerely

C. Clark MA, FSA, FRGS, MIFA, CIFA.





Figure 1 demonstrates the current scale of developments

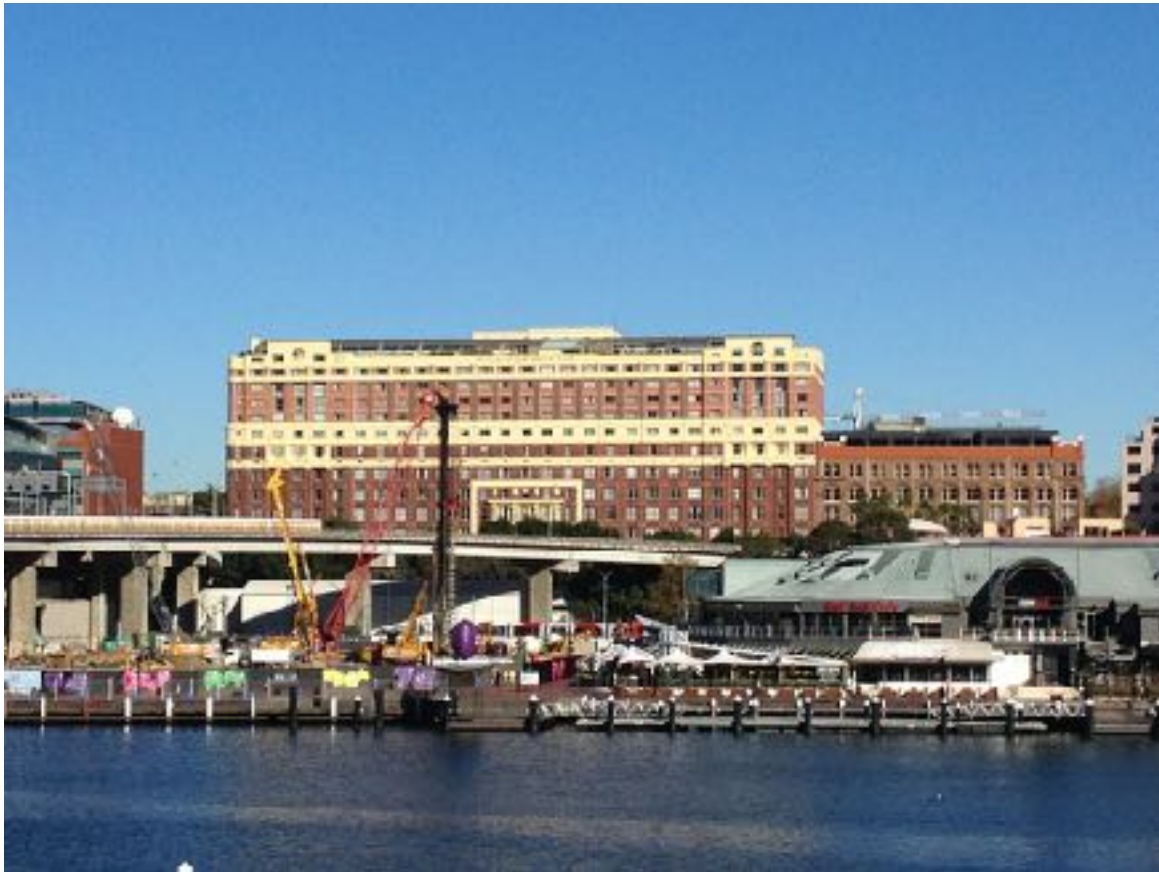
Figure 2 shows that the proposed podium level development stretching all the way along the harbour frontage will create a wall of development along the harbour front. The proposed residential tower is isolated and not in keeping with other structures. It also does not meet the Apartment Guidelines. Because it has been 'lightened' the illustration suggests that the podium and tower are insubstantial. In fact the actual convention centre (shown) and in Figure 6 demonstrates that they will not be.



These illustrations (3 & 4) show how rendering can be used to minimise the appearance of new development. Glass is neither white, nor transparent.







Figures 5 and 6 illustrate the gradual loss of visual relationship between the Goldsbrough building and the current harbour.



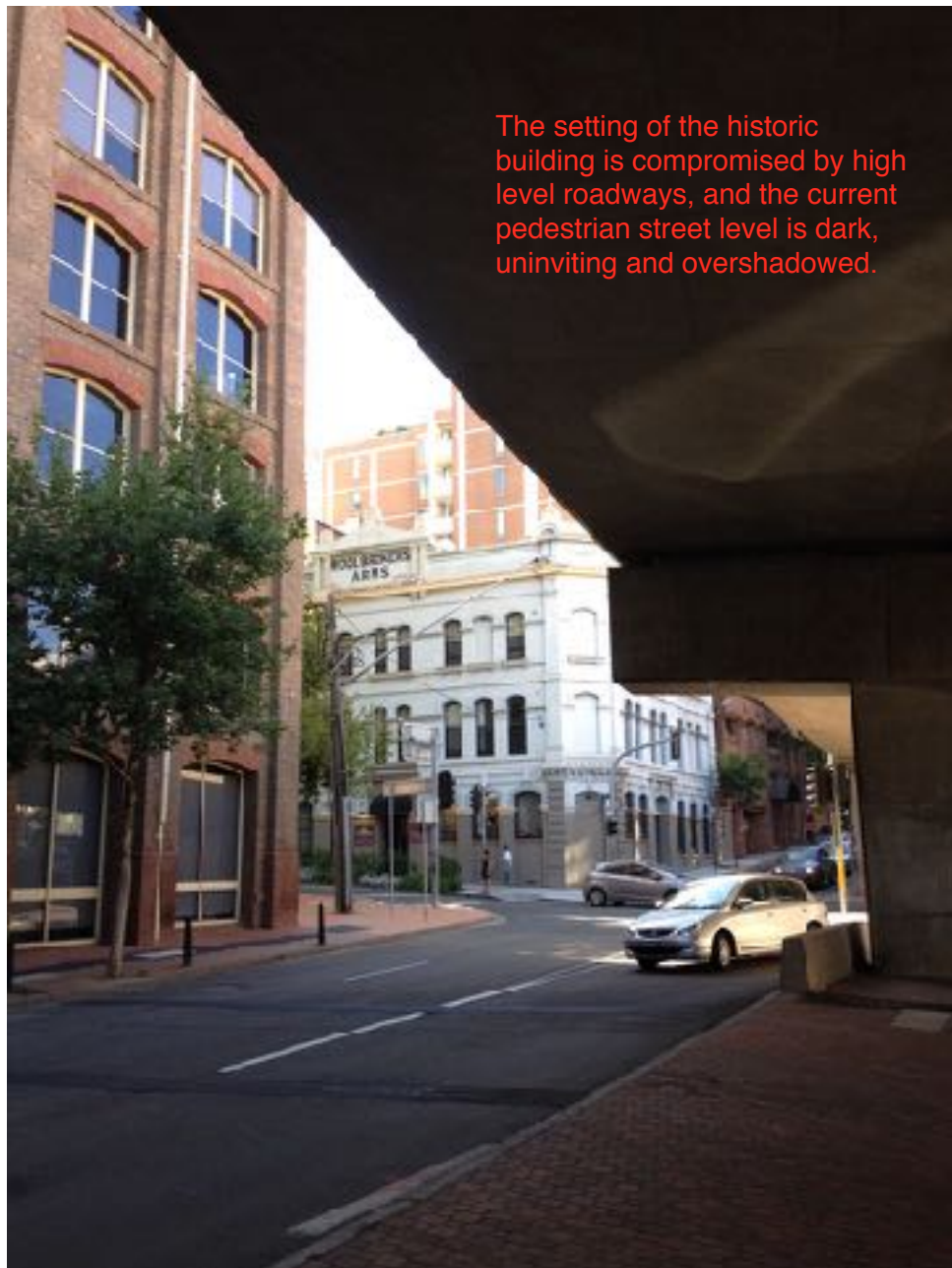


Figure 7 demonstrates how new development can have a deleterious affect on a historic building, through the poor choice of materials, scaling and crowding. Equally if Darling Harbour is to be dominated by a high wall of new development that rises sharply from the water's edge, and does not include brick or sandstone, the Pymont Bridge will in contrast look small and inconsequential.





Figure 9 - the podium level development does not step back from the foreshore in any meaningful way in relation to other buildings and Pyrmont to the west, creating a large new building right on the foreshore. The illustration has been artificially rendered to minimise the appearance of the glass and the solidity of the construction.



The setting of the historic building is compromised by high level roadways, and the current pedestrian street level is dark, uninviting and overshadowed.

Figure 8- high level road access can result in a ground level streetscape that is dark, noisy and devoid of interest or activation. There is a risk that Darling Drive will become even more of a busy traffic through route and barrier between Darling Harbour and Pyrmont.

At the same time high level development close to a historic structure - whilst not actually impinging on the historic fabric - can detract significantly from the amenity and appreciation of the historic building





## A NEW PUBLIC BUILDING IN A CBD HISTORIC CONTEXT



LOCATION PLAN

## THE PROJECT

The project, in the City of Sydney, involved the conservation of the original 1887 fire brigade building, adaptive re-use of the 1912 addition, construction of a covered courtyard behind these buildings, demolition of a factory fronting Castlereagh Street and construction of a new building on this site. The NSW Government Architect with architects Lindsay Clare and Kerry Clare has created a new complex which continues the site's use by the NSW Fire Brigades but accommodates the modern requirements of a fully functional fire station.

## THE SITE

The original three-storey masonry building fronting Castlereagh Street was designed by the Colonial Architect, James Barnet, and completed in 1887. The building was extended by Spain Cosh and Minnet in 1912 following the demolition of two cottages. The 1912 extension is an addition of a similar scale and in the style, materials and detail of the 1887 façade. Various later changes to the site have occurred over time to facilitate the operational needs of the Fire Brigade, including the demolition of the terraces to the rear of the site fronting Bathurst Street.

The site is in the inner CBD, opposite buildings of similar scale and character but surrounded by much later and larger buildings.

The site is listed as a heritage item on the State Heritage Register and the City of Sydney's local environmental plan.

## THE CHALLENGES

The continued use of the site by the NSW Fire Brigade, the buildings' aesthetic and streetscape qualities and the significance of their early fabric were identified as important heritage values. The challenge was to integrate the various components of the site to provide a modern, fully operational and efficient fire station. Conservation works were needed to the 1887 building, and the 1912 building needed adaptation to provide for updated functions.

The new building was required to provide for new operational needs of the Fire Brigade and those functions that could not be provided in the existing buildings without major intervention in the significant fabric.

The original building was designed to accommodate horse-drawn fire trucks. The later addition provided for minor changes in technology that occurred in the 25 years since the original building's construction. In contrast, there was a marked difference between building technologies in 1912 and 2000, and the expectations of a modern, functionally and environmentally efficient fire station. Large span

openings, for example, were not anticipated in either the 1887 or 1912 buildings. The challenge was how to maintain continuity when the function and the city environment have changed so markedly.

The initial response to the proposal by the Heritage Office, Sydney City Council officers and the National Trust was that the contemporary glass façade treatment would contrast too markedly with the solid masonry of the existing buildings. The architects were required to provide detailed documentation of the proposal for assessment purposes at the development application stage.

## THE SOLUTION

The solution was a contemporary glass-clad building, L-shaped in plan, which provided an internal courtyard. The fire appliances are located in the new building, which provides space for higher vehicles; the courtyard facilitates the larger turning circles of the modern fire appliances. The new building was designed to operate effectively with natural light and ventilation within the inner city location. To achieve this, a double-skin façade to Castlereagh Street was devised.

The interrelationship of the 1887 and 1912 structures with the new L-shaped wing is complex, as the latter encloses the rear of the heritage buildings and creates quite a deep plan arrangement for the naturally ventilated spaces.

The solution for this project developed from analysis and examination of the existing infill guidance that recommended that the masonry façade with standard openings be reinterpreted. Detailed presentations to the Heritage Office early in the design process enabled the regulatory authorities to fully understand the architect's environmental response to the new context and why this alternative approach was valid. Following this meeting the proposal was supported as an appropriate interpretation and response to the historic context. Subsequent discussions and negotiations with the National Trust and Sydney City Council's Heritage Department gained their support and the development was approved.

The solution challenges the normal pre-conception that a glass façade would not be acceptable within a historic context that is predominantly masonry with punched openings. The glass screen, with the pattern of openings behind, provides a level of decorative detail appropriate to the original building and reminiscent of the masonry building's rhythm of solid to void. The base and top section of the new structure relate to the scale of its neighbour. Contemporary details and markers were used to create new relationships with the key architectural elements of the heritage building.

**65A :**  
The building sits in a mixed context of nineteenth-century to late twentieth-century buildings.

**65B :**  
The new building with the existing fire station adjacent.



65A



65B

Case Study 10 from the Heritage Council guidance on new design in a historic context - whilst the example is different to Darling Harbour, the case study illustrates the principles of designing in context.





66A : Elevation to Castlereagh Street.



66B :  
Section through the site.



67 :  
The model of the site illustrates how the new building works in relation to the interior court.



68 :  
The interior court.

### THE LESSONS

The extension to the fire station in Castlereagh Street is exemplary in its use of a glazed façade and its subtle treatment of bays that relates to the consistent historic context of Castlereagh Street buildings.

Early consultation with the approval authorities and thorough explanation of the issues meant that a non-standard solution could be fully understood before the development application was submitted. The architect's re-interpretation of the existing building in a contemporary

manner was refined during this process through open discussion between the architect and the authorities.

The new complex of buildings retains the continued use of the site by the NSW Fire Brigade but provides for the significant technological changes to its operational requirements that have occurred since the late nineteenth-century. The evolution of the site over the last 125 years to meet these needs has also retained the two heritage buildings. It has also added a new, high-quality building

to the ensemble, reinforcing the scale and character of the existing buildings and the streetscape. It provides for modern functional requirements in a way that does not diminish the significance of the heritage buildings.

This case study shows that it is possible to achieve a highly contemporary, non-standard solution that meets the broader aims and objectives of the criteria for good design in an historic context.

DESIGN CRITERIA	EXISTING CONTEXT	INFILL BUILDING
CHARACTER	<ul style="list-style-type: none"> <li>Highly mixed CBD varying between nineteenth-century commercial buildings and twentieth-century office buildings</li> </ul>	<ul style="list-style-type: none"> <li>Contemporary new building with its own character that responds to existing context and skilfully sits quietly within it</li> </ul>
SCALE	<ul style="list-style-type: none"> <li>Mixed scale from four to five- storied adjacent buildings to nearby high-rise</li> </ul>	<ul style="list-style-type: none"> <li>Follows scale of adjacent building to street although is deeper in plan</li> </ul>
FORM	<ul style="list-style-type: none"> <li>Adjacent existing fire station of robust simple rectilinear form with parapeted roofline</li> <li>Solid façade with wide openings to street level and smaller punched regular openings above</li> </ul>	<ul style="list-style-type: none"> <li>Continues existing fire station form following parapet line and solid wall with large street level openings</li> <li>Glass screen reiterates solid form to street but proportions of openings behind relate to those of the existing buildings</li> </ul>
SITING	<ul style="list-style-type: none"> <li>Buildings to street frontage with courtyard behind</li> </ul>	<ul style="list-style-type: none"> <li>Follows siting to streetscape of existing buildings</li> </ul>
MATERIALS AND COLOURS	<ul style="list-style-type: none"> <li>Rendered masonry, mixed colour palette</li> </ul>	<ul style="list-style-type: none"> <li>Inverts solid walling by use of glass screen with openings behind</li> <li>Steel used as detailing element exposing structure</li> </ul>
DETAILING	<ul style="list-style-type: none"> <li>Nineteenth-century rich detailing with articulated parapet, decorated window surrounds and emphasised cornice lines</li> <li>Vertical emphasis provided through articulated structure</li> </ul>	<ul style="list-style-type: none"> <li>Pared down detailing that responds to level of detailing of existing buildings using contemporary means and materials</li> <li>Cornice lines responded in articulation of floor plates through the glass screen</li> </ul>

Case Study 10 (cont) The matrix demonstrates how the existing character of an area can be identified and taken into account in new design