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Department of Planning and Environment
Key Sites Assessments
GPO Box 39
SYDNEY NSW 2001

Sent by email to: Tim Green <tim.green@planning.nsw.gov.au>

Dear Mr Sargent,

RE: Upgrades to ASN Company Building (SSD 8967), The Rocks- Notice of Exhibition

I refer to your letter dated 9 April 2019 inviting comments on the above State Significant Development application including the Environmental Impact Statement (EIS) for the proposal involving the following works:

- Change of use from cinema to office;
- Demolition of two cinemas
- Variation to the Sydney Cove Redevelopment Authority Scheme for roof penetration, a new external access ramp to Bays 4 and 5;
- Internal fit out and updates to hydraulic, electrical and mechanical services in Bays 4 and 5
- External amendments including a new window on the western elevation of level 1 and replacement of brickwork on the northern elevations of levels 1-3;
- Upgrade of fire services in Bays 1-5.

The following documents were reviewed to provide comment on this proposal:

- Statement of Heritage Impact prepared by TKD Architects dated July 2018, Issue A;
- Former ASN Co. Building 1-5 Hickson Road, The Rocks, Conservation Management Plan prepared by City Plan Heritage dated 2009;
- ASN Bay 5 – Ground Floor services trench extension Review of Archaeological Implications prepared by Casey and Lowe dated 15 January 2018;
- Former ASN Co Building 1-3 Hickson Road, The Rocks, Building Fire Safety upgrade Bays 1 to 4, Base Building works for future tenancies, Bays 4 and 5;
- Access Ramp Study by TKD Architects dated 11 August 2014, heritage comments of ramp, sketch with notes, ramp design options, and email correspondence re. design and heritage;
- Fire Engineering report by Wood & Grieve Engineers dated 28 May 2018;
- Environmental Impact Assessment (EIS) by Environet Consultancy Pty Ltd dated November 2018;
- Architectural drawings prepared by TKD Architects

The proposed SSD site includes State Heritage Register (SHR) item ASN Co Building (SHR no. 01526). The subject site is in the vicinity of other SHR items, namely: Campbell's Stores (SHR 01536); Mining Museum (former) (SHR 01555); Metcalfe Bond Stores (SHR 01562). An approval under section 63 of the *Heritage Act 1977* was granted on 16 May 2016 (2016/s60/006) for a similar proposal comprising a change of use to a hospitality school and involving complete internal refurbishment with some external additions and alterations.

Historical Archaeology

The CMP for the site identifies the site contains archaeological potential and archaeological monitoring should be undertaken for any ground disturbance of the site by a suitably qualified archaeologist (2009: p102).

The Casey and Lowe assessment supporting the works provides a short analysis of the proposed ground disturbance works below the ground floor in Bay 5 only, specific to drainage works. This work will involve some minor additional service connections for drainage and a monitoring and recording program is recommended. If remains that are substantive in nature are identified, works may need to adjust to avoid impacting them. The results should be documented in a final report with appropriate artefact analysis. The

As noted, the supporting document by Casey and Lowe dated 15 January 2018 only considered a package of modified drainage works. That document does not assess any other ground disturbance works (e.g. hydraulic, electrical and mechanical services in Bays 4 and 5 for the new fitouts or upgrade of fire services in Bays 1-5). However, review of the SOHI prepared by TKD dated January 2018 indicates the proposed works for this SSD will re-use existing disturbed trenches and confirms the works in Bay 5 will focus on the works assessed by Casey and Lowe. This proposal is consistent with Policy 12 of the CMP (2009).

The Division supports an archaeological monitoring program to ensure significant archaeology, if present, is appropriately managed according to best practice. The following conditions are recommended to support this.

The following conditions of approval related to historical archaeology are recommended:

- a) The proposed ground disturbance works below the ground floor level (not in existing services trenches) shall be subject to a program of archaeological monitoring in accordance with the document: *ASN Bay 5 – Ground Floor services trench extension Review of Archaeological Implications prepared by Casey and Lowe dated 15 January 2018*. Should significant finds be identified during the monitoring project, efforts shall be undertaken to adjust the design to avoid impact and retain State significant archaeology unharmed wherever possible.
- b) The archaeological monitoring program shall be undertaken by a suitably qualified and experienced historical archaeologist who can satisfy the Heritage Council of NSW Excavation Director Criteria 2011 at a state level.
- c) Final Archaeological: The Applicant shall prepare a final excavation report which documents the results of the excavation in accordance with Heritage Council of NSW Guidelines and best practice and submit this report within 12 months of the completion of the archaeological excavation to the Department of Planning and Heritage Council of NSW.

Built heritage

The following comments are provided against the various components of the proposal:

Change of use

The proposed use is generally compatible with the building and does not require alterations that adversely impact the heritage values. The affected areas have been vacant for some time. Therefore, the proposal is considered acceptable.

Removal of existing cinemas and fitout and replacement fitout

The fabric proposed for removal is not significant therefore there will be no adverse impact. New fitout is generally sympathetic. The proposed layout aims to minimise impact on the open warehouse spatial character although some impact is inevitable, particularly from proposed toilets and stairs. Details of the proposed toilets and their impact has not been provided, particularly whether they extend the full height. It is understood that some early elements will be reinstated such as timber columns which partly offsets the impact.

Openings in dividing wall

There will be some physical impact and impact on integrity which is considered acceptable as the works are unavoidable and are relatively modest. Impact will be mitigated by salvaging and reusing or storing the fabric removed.

Timber floors

Timber floor fabric is proposed to be removed to accommodate new stairs. The removed fabric will be relocated on site. Any impact is considered low and is offset by the reinstatement of timber stored off site which will have a considerable positive impact.

Glazed window, glass balustrade and replacement entrance door on front elevation

Removal of later brick infill at level 1 will have a positive impact. Proposed glazing comprises plain modern fixed glass. Being below street level, visibility is low. HIS notes that traditional detailing is not feasible although details and justification have not been provided to fully assess the impact. Impact of glass balustrade and justification has not been provided although impact is likely to be acceptable due to the recessive nature. Removal of entrance door will have some impact which is considered acceptable as the fabric is from mid-20th century and of moderate significance.

Roof level works

The proposed works are minor and will have low visibility therefore the impact is considered acceptable.

Services/fire safety upgrade

It is understood that the services will be surface mounted and reticulate in proposed shafts and new cavities. Generally, the impact is considered to be acceptable. It is not clear whether any significant early service fixtures such as sprinklers will be retained. Overall, the fire safety upgrade works will not have any major adverse impact on significant fabric.

Front equitable access

Options study and other documentation has been provided to address the SEARs and the related condition of consent of the s.60 approval granted on 16 May 2016. The documentation notes that retention of existing balustrade and inserting a new one behind is not feasible due to insufficient space available. However, the deficit appears to be marginal and it appears that this option may be achievable through slight modifications. Overall, there are still concerns regarding the proposed scheme comprising a replacement balustrade

radically different from the existing as it will disturb the consistency across the overall front elevation and have a considerable visual impact on the principal elevation. It is recommended that design improvements to the front ramp and balustrade are explored, including retention of existing balustrade, or further information provided in support of the proposal.

It is further noted the Statement of Heritage Impact does not address impacts of works individually. The proposed changes are not highlighted in the drawings and information is not readily apparent, for example new door openings are not shown in red, proposed glass balustrade not shown on elevations, etc. It is recommended that the documentation is revised to address impacts of the above noted works, particularly where details are not clear.

If you have any questions regarding the above advice, please feel free to contact Rajat Chaudhary, Senior Heritage Assessment Officer, Heritage Division, Office of Environment and Heritage, at email: rajat.chaudhary@environment.nsw.gov.au on telephone: 9873 8521.

Yours sincerely



Steven Meredith
Regional Manager, Southern Assessments
Heritage Division
Office of Environment & Heritage
As Delegate of the NSW Heritage Council

13 May 2019