



Our ref: DOC19/54708

Mr Cameron Sargent  
Team Leader  
Key Sites Assessment  
Department of Planning & Environment  
GPO Box 39  
SYDNEY NSW 2001

Via email: [karl.fetterplace@planning.nsw.gov.au](mailto:karl.fetterplace@planning.nsw.gov.au)

Dear Mr Sargent

**NOTICE OF EXHIBITION FOR 85 HARRINGTON STREET AND 66-68 AND 70-72 GLOUCESTER STREET, THE ROCKS (SSD 7037 MOD 2)**

I refer to your email dated 21 January 2019 inviting comments on the above State Significant Development modification which includes: minor external and internal alterations to Block 1 and Block 2; alterations to Baker's Terrace; and alterations to access and landscaping, including removal of street trees and replacement planting.

The subject site includes the State Heritage Register item Baker's Terrace, which includes two separately listed buildings: 66-68 Gloucester Street (SHR 01530) and 70-72 Gloucester Street (SHR 01531). Baker's Terrace is significant for its historical, aesthetic, social, research, and rarity values.

The following reports were considered in our assessment:

- *Addendum to Heritage Impact Statement: 85 Harrington Street, The Rocks*, prepared by Urbis, dated 23 November 2018;
- *Section 4.55(2) Modification 2 to SSD 7037/ 75-85 Harrington Street, The Rocks*, prepared by Urbis, dated 20 December 2018; and
- Architectural and landscape drawings, prepared by FJMT.

As delegate of the Heritage Council of NSW, I provide the following comments:

- Generally, the changes to Baker's Terrace are internal and retain more significant fabric than the original proposal. Whilst the changes to the floor level to the two front bedrooms of the northern terrace would have a minor impact on the spatial qualities of the rooms, the floating floor and step would be reversible and would not impact the significant heritage values of the terraces and is acceptable. The retention of fabric of high and exceptional significance in the basement addresses the condition previously recommended for the conservation of this fabric and is supported. The external presentation of the item would be conserved, ensuring the aesthetic values, views and contribution to the character of The Rocks would be retained.
- Division of significant spaces is not desirable. Ideally whole rooms/spaces should be used for providing amenities.
- The works to proposed Blocks 1 and 2 would not generate any further negative heritage impact than the original proposal.
- The proposed landscape works between Baker's Terrace and Block 2 are supported as a modern, sculptural interpretation of the topography of The Rocks, with the differentiation in paving adjacent to Block 2 interpreting Cambridge Street. Consideration should be given to how this interpretation is conveyed to users as part of the interpretation strategy.

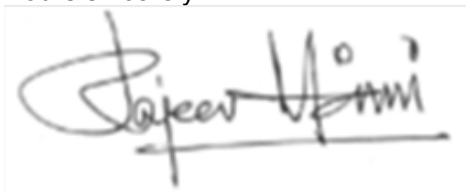
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Being low in height the sculpture would not block important views to Baker's Terrace, or impact significant fabric or other important values and is acceptable. The retention of the Harrington Street ridge bedrock is a positive conservation action that is supported.

- The subject modification does not address the potential archaeological impacts of the proposal. Comments at various stages of the assessment of the previous proposal highlighted this issue. An archaeological assessment is required to be considered and approved prior to the commencement of works. The recommended approach is reiterated:
  - Where the archaeological assessment identifies that, there are likely to be archaeological resources of local or state significance requiring management, the applicant shall submit an Archaeological Research Design and Excavation Methodology undertaken by a suitably qualified and experienced historical archaeologist;
  - The name of a nominated excavation director suitable to satisfy the Excavation Director Criteria of the Heritage Council of NSW for the proposed activity and significance level;
  - The Research Design and Excavation Methodology should clearly state the provision of a final excavation report prepared by the approved Excavation Director is prepared and submitted in accordance with Heritage Council of NSW guidelines within 12 months of the completion of the archaeological activity; and
  - If historical archaeological deposits are discovered unexpectedly during works, work must immediately cease in the affected area(s) and a suitably qualified and experienced archaeologist must be contacted to assess the finds. Additional assessment and approval may be required prior to works continuing in the affected area(s) based on the nature of the discovery.
- Some conditions recommended for the previous scheme are still relevant and are reiterated below:
  - All the proposed wet-areas within the Bakers Terraces must be designed and installed in a manner that is reversible and does not impact original or significant fabric. This may be achieved by installing wet-area capsules inside significant rooms, to allow all services and fixtures to be independent of significant fabric.
  - Submit to the Department of Planning and Environment for assessment and approval the Interpretation Plan, including implementation details in accordance with the report entitled *Interpretation Strategy, 85 Harrington Street, The Rocks*, prepared by Urbis Pty Ltd dated January 2016.

If you have any questions regarding the above advice, please contact Anna London, A/Senior Team Leader, Regional Heritage Assessments, North at the Heritage Division, Office of Environment and Heritage, via e-mail: [anna.london@environment.nsw.gov.au](mailto:anna.london@environment.nsw.gov.au) or on telephone: 9873 8608.

Yours sincerely



**RAJEEV MAINI**

A/ Regional Manager, South  
Heritage Division  
Office of Environment & Heritage  
**As Delegate of the NSW Heritage Council**  
10 February 2019