

8 July 2021

The Rt Hon the Lord Mayor of Sydney,
Councillor Clover Moore,
City of Sydney
GPO Box 1591
Sydney NSW 2001

By email: cmoore@cityofsydney.nsw.gov.au

Dear Lord Mayor,

RE: D/2021/478; 43-45 George Street, 47 George Street THE ROCKS NSW 2000

I write to you to raise some very serious concerns that the National Trust has regarding a proposed development in The Rocks. I hardly need to tell you how valuable The Rocks is as a heritage asset to Sydney, and how important it is to the National Trust. This proposal places decades of previous work in jeopardy, and would set a very dangerous precedent for future development in this precious area.

The proposal for redevelopment of the buildings at 43-45 George Street and 47 George Street, The Rocks, is located in an area of great sensitivity. Situated in a key locality within The Rocks - Atherton Place, leading to Playfair Street - it is a pedestrian space surrounded by historic buildings, including the Harrington Buildings, Metcalfe Bond Store and the Argyle Stores.

The National Trust do not consider the proposed new building to be an appropriate design for this most historic location, and recommend the current design be refused and a more nuanced and contextual approach be employed by the architect.

We urge the City of Sydney to reject this proposal which will have far reaching consequences for The Rocks – an area of the utmost heritage importance. The Trust calls on the City to demand that a more suitable design, which responds to this very important historic context in a sensitive and appropriate way, is instead put forward.

The Trust is not concerned at the loss of the former Westpac Museum building. This structure, while it may have been considered a good “heritage infill” outcome at the time and has served its purpose well, could now feasibly be replaced by a building of superior architectural quality and amenity. Unfortunately, the new proposal does not achieve this.

Nor is the Trust overly concerned by the proposed conservation works to the historic building at 47 George Street, although we note that the *Schedule of Conservation Works* has been written without close inspection of all fabric and is not accompanied by any drawings to actually quantify the works proposed, and that this of course will need to be considered at a later date.

What the Trust is concerned with is ensuring that any new infill is an appropriate response to its setting and context, as has generally been achieved in The Rocks for many years. We outline our detailed concerns with this proposal below.



Working with scale and grain

The *Design Guide for Heritage*, produced by the Government Architect NSW in collaboration with, and on behalf of, the Heritage Council of NSW, outlines a number of key “Better Placed” objectives. The first of these is *Better Fit*, and the document (p.25) makes the following comments:

*Heritage buildings, structures, and conservation areas make strong contributions to the character of a place. **This creates the context into which new additions, infill projects, and urban design must fit.** It is vital to understand existing urban relationships and to ensure that interventions contribute to these positively and sensitively...*

***New design in heritage areas should relate to the predominant scale and grain of the setting. It should respect the height, bulk, density, and grain of the heritage fabric...** New infill buildings should generally be no higher than neighbouring heritage buildings or the predominant scale of the streetscape.*

The proposed design achieves none of these objectives. It is higher than the surrounding buildings; presents monolithic brick walls in place of small regular openings; and creates a building of great bulk and proportion in a setting defined by a variety of shapes, textures and materials. The new building may be a fine and interesting new design – but it is not appropriate for this predominant scale and character of this setting.

The Trust raise the following specific concerns in relation to the inappropriate scale and grain of the proposed development:

- The Union Bond Store (47 George Street) is a building of significant scale and prominence in the context of The Rocks. The bulk and scale of this building reflects the prominence of George Street, and the smaller buildings behind also reflect this urban pattern. The proposed new building justifies its height based on the Union Bond building, yet in fact then increases in height to the rear, having a severe negative effect on the two storey terraces in Atherden and Playfair Streets. Where the existing Westpac Museum building offered a transition down in scale, this new structure does not respond in either way.
- The Heritage Impact Statement argues (p.1) that “*The brick facade is staggered and laid with a slight overhang... This use of face brick in highly crafted and textured application is an honest and thoughtful response to the history of The Rocks and the dominant architectural character of the precinct.*” The use of brick alone is not a justification for this building in heritage terms. All of the surrounding structures are characterised by regular openings, a variety of setbacks, and (above all) for a human-scale in relation to the street. The current Westpac Museum is a poor response to the streetscape in these terms, but the proposed building is of another scale and bulk entirely and makes for a worse outcome.
- The rear elevation of the Union Bond Building is a key element of the historic street character of the place when seen from Playfair Street and Gloucester Walk. (This effect is of course amplified by the oblique nature of Playfair Street.) The proposed new building has been aligned with the very top of the wall of this building, and as a consequence the pedimented roof form is completely obscured.



The triangular pediment of the Union Bond Store (and its alignment with George Street) is completely obscured by the new building, and is reduced to a two-dimensional plane. The blank facades of the new building take no inspiration at all from the surrounding context and their fine grain. (Source: Google Maps, above, and Heritage Impact Statement by Urbis, below)



Previous concerns raised, and ignored

The Heritage Impact Statement makes clear a number of key concerns raised by Place Management NSW in relation to the proposed design.

The National Trust strongly agree with the feedback from Place Management NSW that the bulk and scale in relation to the view from Gloucester Walk and the impact of the upper level structures on the views of Merchants House and 47 George Street is of great concern. There appear to have been no subsequent efforts made by the architect or heritage consultant to address this key issue.



Existing views from Gloucester Walk showing the variety of orthogonal forms and general visual character of The Rocks when seen from this key viewpoint (above); and the overwhelming, monolithic design of the new structure (below). The rear elevations of the Merchants House and the Union Bond Store are completely obscured by a form that is completely foreign to this sensitive context.. (Source: Smart Design Studio)

Merchant's House Setting

As you are no doubt aware, the Merchant's House (43 George Street) is listed on the NSW State Heritage Register. The Statement of Significance for that building, amongst other things, states that:

"The Merchant's House is of outstanding significance on a State level as a rare example of an archetypal townhouse/store building of the pre-gold rush era. It makes an important contribution to the historical character of SHFA's George Street North Metcalfe Heritage Precinct and provides evidence of commercial development in George Street, Sydney's first street and the centre of colonial activity for the greater part of the 19th century."

The proposed development will have a very significant negative impact on the Merchant's House (43 George Street) to the rear.

The plans indicate a new "Merchant's House Courtyard" , which will in fact be a place with a four storey, windowless brick wall - taller than the Merchant's House itself and limiting any views to and/or from the rear of that property and severely limiting daylight at the lower levels which include a basement.



Conclusion

Whilst the Trust appreciates that the primary focus of this development application is the demolition and replacement of the relatively modern building, the former Westpac Museum building, located at the rear of the Merchants House, the Trust is very concerned that the scale and bulk of the proposed new building is entirely unsympathetic with its context and will have a seriously deleterious effect upon the character of the buildings directly affected by the proposed works and will serve to degrade the historic character of the Rocks Precinct as a historic area and as a tourist destination.

In another context, this architectural design may well be laudable but, in this case, it is simply inappropriate. The building replaces a fairly recessive infill building in an area of predominantly rectangular Victorian masonry buildings with an attention-seeking modern design that features circular corners, a prominent circular tower, extensive walls of glazing, and monolithic windowless brick walls. The building would certainly have some degree of 'design excellence' in isolation but, as a design in response to context – surely the most important consideration for infill buildings in Sydney's precious Rocks precinct – it fails on all levels.

We note also that the design appears to suggest that the rear courtyard will become a major circulation space where, in fact, the rear yard is very small and abuts the rear yards of the neighbouring buildings. As it is not suggested that the neighbouring yards will be incorporated into this development, the renderings provided are therefore quite misleading.

The Rocks is an area of supreme historic importance to Sydney, and indeed Australia, and the basic principles of good design in a heritage context have certainly been refined and better understood since the days of the original Westpac Museum infill this proposal seeks to replace. Indeed, there are numerous very good examples of sensitive contemporary design within The Rocks already. It seems surprising, therefore, that we should be considering such a proposal at this point in time.

The National Trust is very concerned about the long-term impact that this development will have, creating a precedent that will lead to the gradual erosion of the heritage values of the whole precinct. We believe that a far more responsive, yet equally contemporary, design can readily be achieved in this location.

The Trust urges the Council to reject this proposed development in the clearest terms.

Yours faithfully,

Neil Wykes OAM
President

C.c: Deputy Lord Mayor Cllr Jess Scully,
Cllr Philip Thalys,
Tony Smith, and
Alex Greenwich MP