

Attachment A15

Heritage Impact Assessment

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URBIS

HERITAGE IMPACT STATEMENT

383 Kent Street, Sydney
Gadigal Land

Prepared for
CHARTER HALL HOLDINGS PTY LIMITED
14 December 2023

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Project Code	P42402
Report Number	01 Draft 09.05.2023
	02 For issue 22.05.2023
	03 Revised for issue 07.06.2023
	04 Revised for issue (updated GFA) 26.06.2023
	05 Revised for issue (updated GFA) 12.07.2023
	06 Revised for Issue (updated GFA) 14.12.2023

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EXECUTIVE SUMMARY

This Heritage Impact Statement (HIS) has been prepared by Urbis in support of a Planning Proposal to amend the *Sydney Local Environmental Plan 2012* (LEP). This report has been prepared on behalf of Charter Hall Holdings (the Proponent) and it relates to a single development lot identified as Lot 1 in DP 778342 or 383 Kent Street, Sydney (the site).

The purpose of this Planning Proposal is to amend the site's maximum Height of Building development standard and maximum Floor Space Ratio (FSR) development standard to unlock additional floor space to be used exclusively for employment generating land uses, consistent with the vision and intent of the Central Sydney Planning Strategy (CSPS) for tower cluster sites. This Planning Proposal will also seek to facilitate significant public benefits through additional site activation by way of a new through-site link, shared basement loading dock facility and delivering on sustainable initiatives to contribute to the City of Sydney's vision to achieve net zero energy buildings.

The proposed Sydney LEP amendment is part of the broader redevelopment plan for the site to remove the existing 10 storey car park, and construct a new 42 storey commercial office tower.

The subject site is not a heritage item, nor is it located within a Heritage Conservation Area. It is, however, located adjacent to, and in the vicinity of, a number of heritage items which are listed under Schedule 5 of the Sydney LEP 2012. This HIS has therefore been prepared to assess the potential impacts of the Planning Proposal on the established significance of these nearby heritage items.

The assessment of impact carried out in Section 5 of this report has found that the proposal is supportable on heritage grounds for the following reasons:

- There will be no material impacts on any heritage items.
- There are no identified views of significance to nearby heritage items which would be affected by the proposed planning control changes for the site.
- Development in line with the Planning Proposal facilitates the removal of a multi-storey carpark which demonstrates a poor interface with the streetscape and heritage items in the site's vicinity. New development would allow for more useable / habitable floorplates at the podium, which would allow for an improved streetscape outcome.
- The new development is for commercial purposes, which is consistent with the significance of the surrounding area described in the Sydney DCP 2012.
- The reference scheme shows a 5- and 6-storey podium which responds to the street walls at Kent and Sussex Streets (respectively) and, therefore, will maintain the consistency of built forms with respect to the pedestrian experience within the Special Character Area.
- The new tower form will include setbacks at all sides from the property boundary / podium below, in order to maintain appropriate visual separation from the nearby heritage items and other tall-scale forms in the locality. Extant development, being an amalgam of a lower scale podium building (1976) and tower (1998) is not of heritage significance and proposed demolition is supported on heritage grounds. The proposed envelope responds to the streetscape in the adoption of the lower scale podium and setback tower form.
- The Planning Proposal allows for an intensification of development on a site which is of no heritage significance and has no further impact on the setting of the vicinity heritage items or the Special Character Area.

On the basis of the above, the proposal is therefore recommended for approval on heritage grounds, having regard for the recommendations made at the conclusion of this report.

1. INTRODUCTION

1.1. BACKGROUND

This Heritage Impact Statement (HIS) has been prepared by Urbis in support of a Planning Proposal to amend the *Sydney Local Environmental Plan 2012* (LEP). This report has been prepared on behalf of Charter Hall Holdings (the Proponent) and it relates to a single development lot identified as Lot 1 in DP 778342 or 383 Kent Street, Sydney (the site).

1.2. SITE IDENTIFICATION

1.2.1. Location

383 Kent Street falls in Lot 1 Deposited Plan (DP) 778342 within the City of Sydney LGA. It fronts Kent St to the east and Sussex St to the west.



Figure 1 – Aerial image of locality, with subject site outlined red and highlighted yellow
Source: SIX Maps, 2023

1.2.2. Special Character Area

The eastern half of the site (frontage to Kent Street) is situated within the York St/Clarence St/Kent St Special Character Area, as identified in the Sydney LEP 2012.



Figure 2 – Subject site (outlined grey) within the York St/Clarence St/Kent St Special Character Area
Source: City of Sydney Planning Controls Map, 2023, with Urbis overlay

1.3. HERITAGE CONTEXT

1.3.1. Heritage listing

The site is not identified as a heritage item under any statutory or non-statutory register or list.

1.3.2. Heritage Conservation Area

The site is not located within any identified Heritage Conservation Area (HCA).

1.3.3. Heritage items in the vicinity

The site is located in the vicinity of a number of heritage items which are listed under Schedule 5 of the Sydney LEP. These are listed below:

- *Former maritime building façade 'CMC House', 160–166 Sussex Street (local significance, I1962)*
- *Former commercial building facade 'Metropolitan Business College'/ Former Warehouse Façade (367-371 Kent Street), 367–371 Kent Street (local significance, I1826)*
- *Former commercial building facade 'Seabridge House'/ Former Warehouse Façade (373-377 Kent Street), 373–377 Kent Street (local significance, I1827)*
- *Former commercial building facade 'Waratah House'/ Former Warehouse Façade (365 Kent Street), 365 Kent Street (local significance, I1825)*
- *Former Warehouse/ Former Warehouse (332-334 Kent Street) Including Interiors, 332–334 Kent Street (local significance, I1815)*
- *Former Warehouse/ Former Warehouse Including Interiors, Cartway and Courtyard, 336 Kent Street (local significance, I1816)*
- *Former warehouse 'Royston House'/ Former Warehouse Including Interiors, 342–344 Kent Street (local significance, I1820)*
- *Former commercial building 'Guild House'/ Former Warehouse Including Cartway, Courtyard and Interior (formerly 340 Kent Street), 338 Kent Street (local significance, I1819)*
- *Commercial building 'Letraset House'/ Former Warehouse Including Interiors, Cartway, Courtyard and Interior, 346–348 Kent Street (local significance, I1821)*

- Former commercial building 'Norton House'/ Former Warehouse Including Interiors, 352–358 Kent Street (local significance, I1822)
- Commercial building 'Century House'/ Former "Hordern" Warehouse Including Interiors, 360 – 362 Kent Street (local significance, I1823)



Figure 3 – Heritage map, showing heritage items shaded tan and the subject site outlined red
Source: City of Sydney Planning Controls Map, 2023, with Urbis overlay

1.4. METHODOLOGY

This HIS has been prepared in accordance with the NSW Heritage Division guidelines 'Assessing Heritage Significance', and 'Statements of Heritage Impact'. The philosophy and process adopted is that guided by the Australia ICOMOS *Burra Charter* 1999 (revised 2013).

Site constraints and opportunities have been considered with reference to relevant controls and provisions contained within the Sydney LEP 2012 (LEP) and the Sydney Development Control Plan 2012 (DCP).

1.5. AUTHOR IDENTIFICATION

The following report has been prepared by Oliver Lennon (Heritage Assistant) and Anthony Kilias (Senior Consultant). Fiona Binns (Associate Director) has reviewed and endorsed its content.

Unless otherwise stated, all drawings, illustrations and photographs are the work of Urbis.

1.6. THE PROPOSAL

The purpose of this Planning Proposal is to amend the site's maximum Height of Building development standard and maximum Floor Space Ratio (FSR) development standard to unlock additional floor space to be used exclusively for employment generating land uses, consistent with the vision and intent of the Central Sydney Planning Strategy (CSPS) for tower cluster sites. This Planning Proposal will also seek to facilitate significant public benefits through additional site activation by way of a new pedestrian through-site link, shared loading dock facility and delivering on sustainable initiatives to contribute to the City of Sydney's vision to achieve net zero energy buildings.

The proposed Sydney LEP amendment is part of the broader redevelopment plan for the site to demolish the existing structure on the site (including the existing 10 storey car park), and construct a new 42 storey commercial office tower with a total maximum FSR of 20:1 (circa 73,000m² GFA).

The reference scheme supporting the Planning Proposal and site specific DCP can be described as follows:

- Demolition of the existing building, including removal of the over 800 capacity public car park.
- Construction of the following:

- New 42-storey office tower comprising a total FSR of 20:1, up to a height of RL 189.60 (approximately 170m above Kent Street and 180m above Sussex Street).
- New premium-grade commercial floorspace with an approximate GFA of circa 73,000m².
- New through-site link connecting Kent and Sussex Streets, including public art activation.
- New ground floor activation opportunities, including approximate retail GFA of circa 700m².
- 2 levels of basement, comprising:
 - Basement Level 1 facilitating 70 car parking spaces; and
 - Sussex Street ground level shared loading dock facility including SRV and MRV short term stay bays to service retail tenancies within buildings along Kent Street (located between Market Street and King Street).
- New end of trip facilities below the Kent Street ground level.

The assessment in this HIS is undertaken with reference to the following plans prepared by FJC Studio.

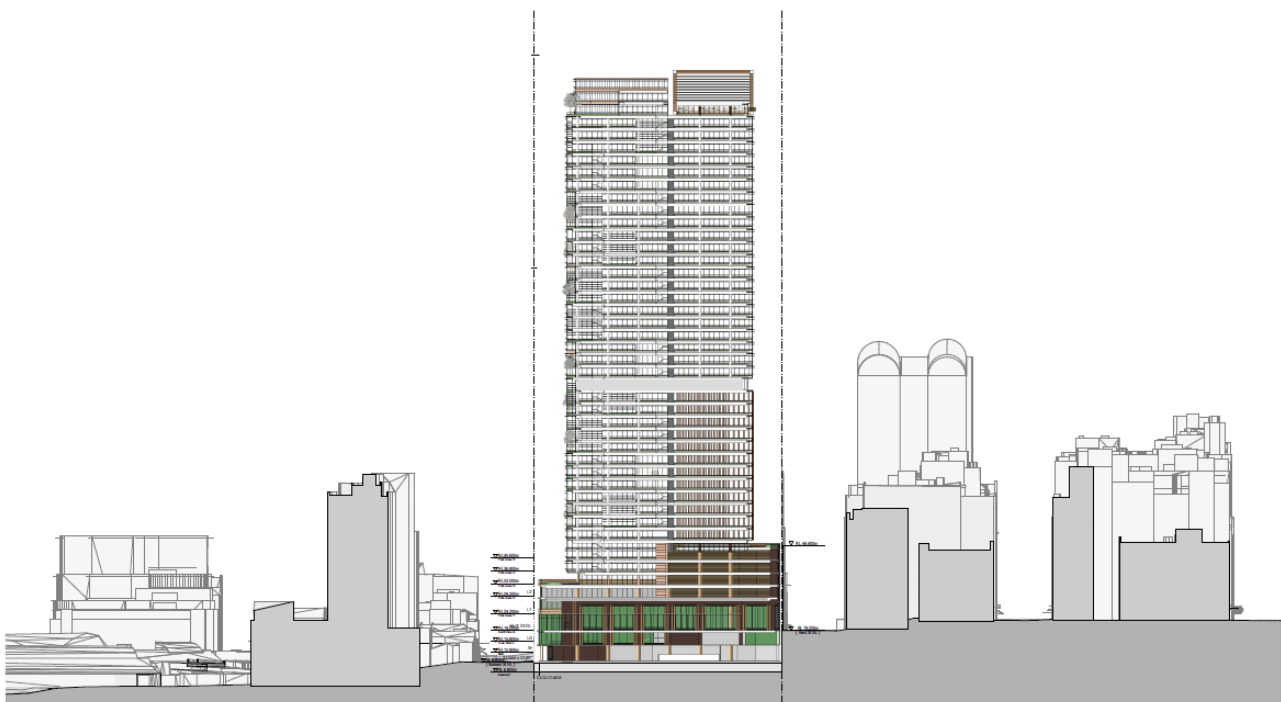


Figure 4 – Reference scheme, showing section east–west
 Source: FJC Studio, May 2023

2. PHYSICAL DESCRIPTION

2.1. SETTING

The block on which 383 Kent St is located is bounded by King St on the north and Market St on the south. With frontages to both Kent Street and Sussex Street, the site is surrounded by a mixture of retail and restaurant tenancies, school and university campuses, and government premises. On the opposite side of Kent Street, buildings are predominately heritage listed and of consistent character and styles, generally being early twentieth-century warehouse and commercial buildings of brick construction. On the western side of Kent Street, there are more modern buildings including larger scale contemporary tower development.

The Site is located within the York St/Clarence St/Kent St Special Character Area. The following description of the Special Character Area is reproduced from the Sydney DCP 2012.

York Street and the streets and lanes surrounding it contain evidence of one of the early warehousing areas in Sydney that developed due to its proximity to Darling Harbour and the City Markets. The area is characterised by nineteenth and early twentieth century warehouse development interspersed with a hotels that flourished in association with the wharves as well as a number of banks. The warehouse stock generally comprises masonry buildings, 3-8 stories in height, and robustly articulated. The architectural emphasis of the buildings located at street intersections are a distinctive characteristic of this area. The network of lanes, internal cartways and courtyards, uniform block pattern with narrow frontages and west-east transport links represent the progressive development of the area, past and present commercial and retail character.

Barrack Street, at the northern end of the area, is one of the finest urban places in Sydney being defined on all four sides, for the most part, by heritage items of exceptional quality.

With the completion of the Sydney Harbour Bridge in 1932, York Street became the main arterial road into the City Centre. Its character altered as higher scale development incorporating retail and commercial office uses was constructed on key street corners, such as the Grace building, ACA House and Asbestos House. In the post WWII period, the value of the warehouse stock diminished as the shipping trade at Darling Harbour declined, whilst the land value and the need for commercial office space increased. As a result, a considerable number of warehouses were either demolished or their facades retained as podiums to high rise development, changing the skyline of the area. From the 1970s, the character of the area has continued to be altered through major elevated freeway and motorway construction at its western edge, severing pedestrian and visual links with Darling Harbour.

The Queen Victoria Building is evidence of early markets in the area, the first on the site established by Governor Macquarie. Its conversion to retail arcade in the early 1980s was amongst the first large scale adaptive re uses and conservation programmes in Australia representing a shift in public sentiment. The building forms an important pedestrian link, both at ground level and underground. Its grand scale and rare composition of dominant domes define many views and terminate vistas within the area, such as from Mullins Street. Together with St Andrews Cathedral and Sydney Town Hall, it remains a major landmark in the City Centre despite surrounding high scale tower development. Bicentennial Plaza is an important urban space that complements its landmark surrounds and provide an expansion of vistas to these key buildings. There are also important key east west views through the area between the City and Darling Harbour and the Pyrmont ridge beyond, as well as many significant vistas such as southwards along York Street, which is terminated by the Town Hall, and eastwards along Barrack Street is terminated by the former General Post Office.

General streetscape views are provided below.



Figure 5 – Kent Street facing south, with the subject site at the right of frame
Source: Urbis, March 2023



Figure 6 – Subject site (right, part view only) and neighbouring building on the south side (left)
Source: Urbis, March 2023



Figure 7 – The boundary between the subject site and neighbouring building on the north side
Source: Urbis, March 2023



Figure 8 – Kent Street, general view facing north-west
Source: Urbis, March 2023



Figure 9 – Kent Street, general view facing south-east
Source: Urbis, March 2023



Figure 10 – Kent Street, general view facing south towards the subject site
Source: Urbis, March 2023

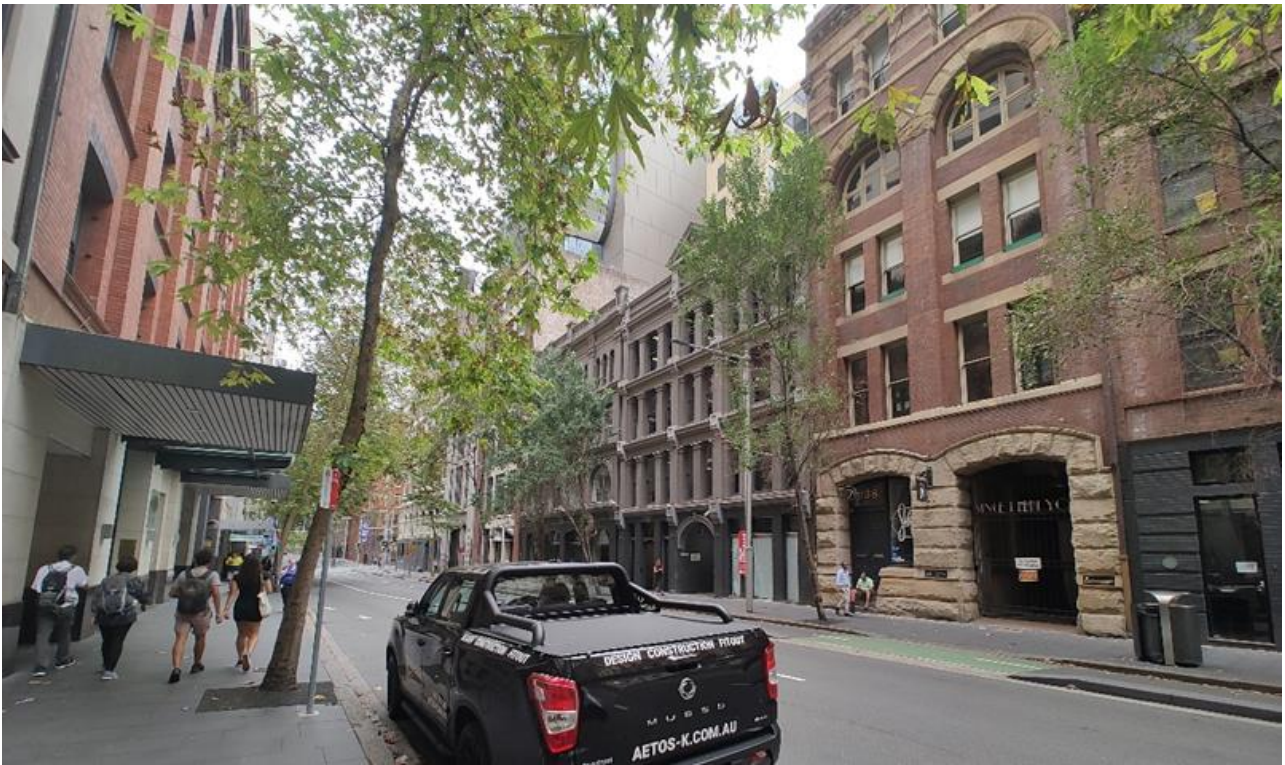


Figure 11 – Kent Street, general view facing north from the subject site
Source: Urbis, March 2023



Figure 12 – Kent Street, general view facing south-east, showing historic warehouse façades
Source: Urbis, March 2023



Figure 13 – Sussex Street, general view facing north with subject site at right of frame
Source: Urbis, March 2023



Figure 14 – Sussex Street, general view facing south-east, showing façade of listed warehouse building at left of frame
Source: Urbis, March 2023



Figure 15 – Sussex Street, general view facing south with subject site at right of frame
Source: Urbis, March 2023

2.2. SUBJECT SITE

383 Kent St is a mixed-use building that extends the full boundaries of the site, consisting of ground level retail tenancies, 10 levels of public car park in the podium, and 11 levels of commercial space above. The topography of the site is steep, falling away from east-to-west, so the elevation of the Kent Street frontage several levels above the Sussex Street frontage. This topography accommodates two partial basement levels beneath the Kent Street frontage, which are accessed via Sussex Street. This has involved excavation to approximately 9.5m depth at the Kent Street frontage to ensure consistent levels across the site and match the ground floor RL at Sussex Street.

The building is a contemporary commercial building. At the Kent Street (east) frontage, the podium (comprising the first four levels) is half-clad with sandstone (at the southern half) with a glazed curtain wall at the northern half. At the Sussex Street (west) frontage, only the ground-floor level is stone clad, while the rest of the eight-storey podium is glazed. The tower form at both frontages is a simple curtain wall structure.



Figure 16 – 383 Kent Street, viewed from the south side of Kent Street
Source: Urbis, March 2023



Figure 17 – View north along Kent Street, showing the awning and ground-floor lobby
Source: Urbis, March 2023



Figure 18 – Front lobby and small retail tenancy at ground-floor level of subject building, at Kent Street
Source: Urbis, March 2023



Figure 19 – Front lobby and small retail tenancy at ground-floor level of subject building, at Kent Street
Source: Urbis, March 2023



Figure 20 – Sussex Street frontage of subject site
Source: Urbis, March 2023

2.3. HERITAGE ITEMS IN THE VICINITY

As noted in Sections 1.3.3 and Section 2.1 above, the site is situated in the vicinity of a number of heritage items which are listed under Schedule 5 of the Sydney LEP 2012. The following table provides a description of these items (as reproduced from the NSW State Heritage Inventory) as well as images of these items to provide additional context.

Table 1 – Physical description – heritage items in the vicinity

Site	Image	Description
Former commercial building facade 'Metropolitan Business College'/ Former Warehouse Façade (367-371 Kent Street) 367-371 Kent Street I1826	 Source: Google Maps, 2023	367-371 Kent Street has a face brick front divided into five bays by substantial piers, united at the top by semicircular arches of three header-soldier rings. Above this is an entablature motif with moulded brick bands for architrave and cornice, and a brick parapet with a moulded-brick coping. The two-light windows have single segmental arch heads laid in three rings of header-soldiers, and a two course sill band of moulded bricks extending from pier to pier. The top windows have round top sashes and arch heads of five rings which, being inside the plane of the pier arches, give the top ensemble an interesting layered-arch character. All the arches are laid in distinctive blue brick. The vehicular entrance has a grooved concrete floor panel indicative of use by horses. The facade at street level is modified. Internally, the building has a conventional timber post and beam structure sheathed over, and suspended plasterboard ceilings. Category:Individual Building. Style:Federation Warehouse. Storeys:5. Facade:Face brick, with blue brick arches; timber windows; render at ground floor level.. Side/Rear Walls:Common bricks. Internal Walls:Painted and plastered brick; plasterboard and stud. Roof Cladding:Corrugated asbestos-cement. Internal Structure:Heavy timber posts; some loadbearing brickwork. Floor:Heavy timber lateral girders, longitudinal joists, herringbone strutting. Roof:Timber trusses and purlins. Ceilings:Modern plasterboard, suspended; exposed floor structure in parts. Stairs:Timber original stair in fire-rated enclosure with sheet metal floor overlay. Sprinkler System:Yes. Lifts:One, modern.

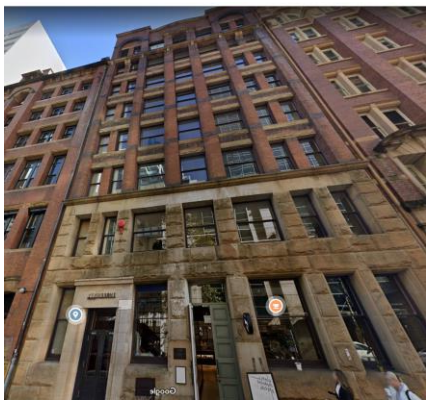
Site	Image	Description
Former commercial building facade 'Seabridge House'/ Former Warehouse Façade (373-377 Kent Street) 373-377 Kent Street I1827	 Source: Google Maps, 2023	The structural frame of Seabridge House is two bays wide, expressed in the facade ambiguously as three pilastrated bays; a wide centre bay flanked by two narrow bays. The centre bay rises from a segmentally arched window at street level to a stripped pediment motif at the top but is divided by a centre pier into two windows. This central pier and the top pilasters are embellished by panels of diamond-point rustication. A moulded cornice crowns the centre bay and the outer piers are also corniced. At street level the render is rusticated. The side bays have entrances; the main doorways have side panels, transom light and terrazzo threshold, and the vehicular entrance has a concrete floor with a grooved centre panel to assist horse traction. A subtle two-storey oriel motif, with bracket supports and an entablature, appears in each of the side bays. Internally the building has an original reinforced concrete structure. The entrance hall has been modified. Category: Individual Building. Style: Inter-War Free Classical/Chicagoesque. Storeys: 5. Facade: Modelled cement rendered concrete, painted; modern aluminium windows. Side/Rear Walls: Cement rendered concrete, off-form concrete. Internal Walls: Plastered concrete, plasterboard studs. Roof Cladding: Corrugated steel. Internal Structure: Reinforced concrete columns; beams and walls. Floor: Reinforced concrete beams and slabs. Roof: Timber Queen-post trusses and purlins. Ceilings: Plasterboard, suspended; plastered concrete; ripple iron on timber furring. Stairs: Concrete (original). Sprinkler System: Yes. Lifts: One, modern.
Former commercial building facade 'Waratah House'/ Former Warehouse Façade (365 Kent Street) 365 Kent Street I1825	 Source: Google Maps, 2023	The ground floor front has sandstone pier bases, cement rendered pilaster piers and a secondary entablature, above which the street facade is articulated in three bays by one-brick thick piers. The main entablature, supported by stone modillions and surmounted by a parapet, comprises a single course of moulded bricks which doubles as both a narrow architrave and a pier cap, a dressed sandstone frieze, and a moulded cornice. In each bay there are deep-set paired windows with stone lintels, rendered sills and moulded brick bands beneath. A cart-way extends from the Kent Street vehicle entrance westwards into the light well. It is at street level, in contrast to the main ground floor which is several steps up from Kent Street. This has allowed the insertion of a low-ceiling store room above the cartway. The

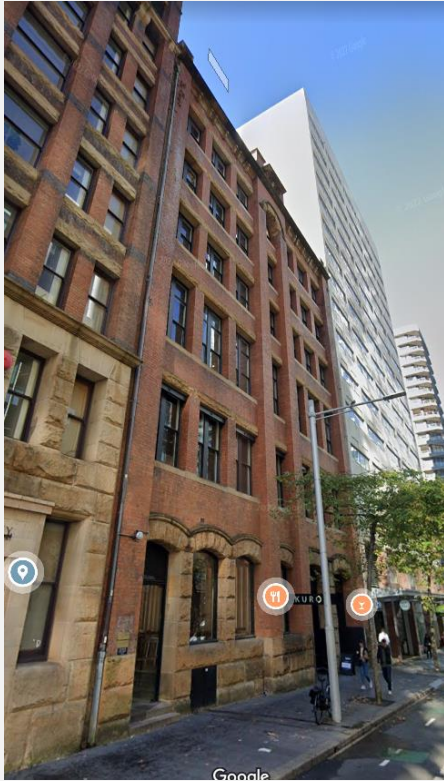
Site	Image	Description
		building structure is a conventional timber post and beam structure sheeted over and modified by removal of one bay of posts. The light well divides the building into two parts, the larger on the east and the smaller on the west, linked by a structure along the north boundary incorporating a connecting corridor and toilets on each of the upper levels. A painted sign at the top reads '2UW fantastic'. The windows facing east and west into the light well are wider than those of the facade and have three-light timber casement frames, deep reveals, squint-brick raking sills and exposed I-beam lintels. Category:Individual Building. Style:Federation Warehouse. Storeys:5 + Basement. Facade:Face brick with sandstone detailing and some cement render; timber windows. Side/Rear Walls:Common bricks, painted. Internal Walls:Painted and plastered brick; plasterboard and stud. Roof Cladding:Corrugated steel. Internal Structure:Heavy timber posts; some loadbearing brickwork. Floor:Heavy timber lateral girders; longitudinal joists, herringbone strutting. Roof:Timber trusses and purlins. Ceilings:Modern plasterboard, suspended; exposed floor structure in parts. Stairs:Concrete, enclosed, modern. Lifts:One, modern.
Former Warehouse/ Former Warehouse (332-334 Kent Street) Including Interiors 332-224 Kent Street 11815	 Source: Google Maps, 2023	The building at 332-334 Kent Street is a four storey structure with load bearing brick walls surmounted by a parapet wall and painted stucco finish and timber structure internally. Windows are grouped together into bays, with the size of individual windows diminishing towards the top of the building. Piers and floors are emphasised on the facade of the building by the use of pilasters and cornices. The building has undergone a series of alterations to allow it to be used as offices, including the replacement of timber windows with steel and the insertion of modern stairs. Category:Individual Building. Style:Victorian Italianate. Storeys:4. Facade:Stucco masonry, steel frame windows. Side/Rear Walls:Face brick. Internal Walls:Face brick. Roof Cladding:Corrugated steel sheet. Internal Structure:Beams not visible; Howells report states timber beams. Floor:Timber joists & boards. Roof:Timber & iron trusses. Ceilings:Plasterbd. , susp. acoustic tiles. Stairs:Refer fire stairs. Fire Stairs:Reinf conc., steel & brass balustrade. Sprinkler System:Yes. Lifts:None. AirConditioned:Yes

Site	Image	Description
Former Warehouse/ Former Warehouse Including Interiors, Cartway and Courtyard 336 Kent Street I1816	 Source: Google Maps, 2023	<i>The Merchant and Partners building No.336-338 (now No.332) is a 4 storey painted brick building with stucco detailing designed in the Victorian Free Classical style. The symmetrical façade is divided vertically by piers into 3 bays. The central bay features a semi-circular vehicular opening at ground level providing evidence of a previous rear loading dock, with simple keystone detailing. The building is crowned at the upper level by a classical pediment rising above the parapet. Levels are defined by cornice string courses. Tall double-hung windows are separated by brick piers. Adjoining the Victorian retail building at 332-334 Kent Street, this building forms part of a cohesive streetscape of late 19th and early 20th century warehouse buildings which are principally grouped along the eastern side of Kent Street, between King and Market Streets, with a large opening to the street level providing evidence of a previous rear loading dock.</i> <i>Category:Individual building. Style:Victorian Free Classical. Storeys:4. Façade:Painted brickwork, stucco detailing, timber framed windows. Side/Rear Walls:Adjoining building. Internal Walls:Original brickwork painted (with internal archways), Plasterbd & stud. Roof Cladding:Minimum pitch corrugated metal sheet.. Internal Structure:Loadbearing brickwork, internal arched openings in masonry. Floor:Contemporary reinf. Conc., timber, carpet (generally). Roof:Timber frame minimum pitch skillion. Ceilings:Contemporary plaster with ceiling roses (bar area), susp. Plasterbd. Ceilings(generally).. Stairs:1970's reinf. Conc. Stair with ceramic tile finish, steel handrail, brick & RC shaft. AirConditioned:Yes FireStairs:1 Lifts:No.</i>

Site	Image	Description
Former warehouse 'Royston House'/ Former Warehouse Including Interiors 342-244 Kent Street I1820	 Source: Google Maps, 2023	<i>Royston House is 4 storey former warehouse which appears to be an early example of the Federation Warehouse style. It has face brick walls with plain dressed sandstone lintels and arches over each bay of a darker coloured brick, and timber framed windows with 9-pane upper sashes. The facade at street level, of face brick with regular courses recessed to give a rusticated appearance, has been painted and has aluminium framed doors and windows. Internally, the building has a conventional timber post and beam structure, and an original late Victorian stair. Category:Individual Building. Style:Federation Warehouse. Storeys:4. Facade:Face brick & sandstone, timber frame windows. Side/Rear Walls:Face brick, arched niches. Internal Walls:Plasterbd. & stud. Roof Cladding:Corrugated steel sheet. Internal Structure:Timber post & beam (sheeted over on 3rd floor). Floor:Timber joists & boards, carpet (1st floor only). Roof:Timber trusses or framing (concealed). Ceilings:Plasterbd. (3rd floor), fibrous plaster (2nd), susp. acoustic tiles (1st), ripple iron (garage). Stairs:Original timber stair with timber balustrade and turned newel posts, ripple iron soffit, in plasterbd. & stud shaft. Fire Stairs:Refer Stairs above. Lifts:1, manual operation. General Details:Although in only fair condition, the building retains a great deal of its early fabric and evocative character. The timber structure is generally exposed internally..</i>
Former commercial building 'Guild House'/ Former Warehouse Including Cartway, Courtyard and Interior (formerly 340 Kent Street) 338 Kent Street I1819	 Source: Google Maps, 2023	<i>The buildings at 197-199 Clarence Street and 340 Kent Street were evidently constructed about the same time and designed by the same hand, and would originally have shared a common rear yard. They are both five storeys high (the Clarence Street building also has a basement) and two bays wide, and have face brick facades with sandstone lintels and arches in the Federation Warehouse style, and timber windows. The top floor of each facade is decorated with horizontal stone banding, and topped with a bracketed stone cornice. The Clarence Street building shows some Romanesque features such as the stub columns supporting arches at the entrances. Internally the buildings have timber floors and structures, with most original features covered by later finishes. Category:Individual Building. Style:Federation Warehouse. Storeys:5. Facade:Face brick & sandstone, timber frame windows. Side/Rear Walls:Face brick. Internal Walls:Face brick to cartway,</i>

Site	Image	Description
		elsewhere plasterbd.. Roof Cladding:Corrugated steel sheet. Internal Structure:Loadbearing walls & timber beams. Floor:Timber joists & boards, carpet. Roof:Timber framing. Ceilings:Plasterbd.. Stairs:Timber stair in plasterbd. enclosure, timber balustrade, ripple iron soffit Internal timber stair in restaurant. Fire Stairs:Refer Stairs above. Lifts:1 modern hydraulic.
Commercial building 'Letraset House'/ Former Warehouse Including Interiors, Cartway, Courtyard and Interior 346-348 Kent Street I1821	 Source: Google Maps, 2023	No 207 Clarence Street is a former warehouse with a face brick and stucco facade in a simplified Victorian Free Classical style, part of the Letraset House group. The interior has been replaced by a modern structure of reinforced concrete beams spanning the full width of the building between the original brick walls, now rendered internally. Windows are aluminium framed in original openings, although the front door case and fanlight above survive (the only examples of these in the group). At the top floor, the stone seatings for former roof trusses are visible on one side only; the roof itself is a modern skillion. Category:Individual Building. Style:Victorian Free Classical. Storeys:4 + basement. Facade:Polychrome brickwork, stucco detailing, timber frame door & fanlights and alumin. frame windows. Side/Rear Walls:Face brick, alumin. frame windows, steel roller shutter. Internal Walls:Plastered brick. Roof Cladding:Corrugated steel sheeting. Internal Structure:Reinf. conc. beams. Floor:Reinf. conc. slab & carpet. Roof:Encased beams. Ceilings:Set plaster on soffit, plasterbd.. Stairs:Reinf. conc., wrought iron balustrade. Fire Stairs:As above. Lifts:None. General Details:This building retains little of its original internal character, but does retain front and rear facades (including original front door joinery). It is in good condition..

Site	Image	Description
Former commercial building 'Norton House'/ Former Warehouse Including Interiors 352-358 Kent Street I1822	 Source: Google Maps, 2023	AME House is an 8 storey former warehouse having features of both the Federation Warehouse and Federation Free styles. It has a face brick and sandstone facade which uses rusticated stone for the street level of the facade and dressed stone for the narrow window mullions, arched pediments, lintels, and the variegated voussoirs in the topmost arches. All the dressed stonework is decoratively carved, giving a delicacy to the facade. The windows are timber framed, with multi-paned top sashes at the 7th floor; the ground floor has modern aluminium framed shopfronts. Internally most original features appear to have been removed or covered. Category:Individual Building. Style:Federation Free Style. Storeys:8. Facade:Face brick & sandstone, timber frame windows, alumin. shopfronts. Side/Rear Walls:Face brick, arched niches. Internal Walls:Plasterbd. & stud. Roof Cladding:Corrugated steel sheet. Internal Structure:Steel column & beam (shown on drawings), oversheeted. Floor:Timber joists & boards, carpet. Roof:Presumably steel framing. Ceilings:Susp. acoustic tiles. Stairs:Timber in fire rated shaft. Fire Stairs:Refer to Stairs. Sprinkler System:Yes. Lifts:1 modern. AirConditioned:Yes.
Commercial building 'Century House'/ Former "Hordern" Warehouse Including Interiors 360-362 Kent Street I1823	 Source: Google Maps, 2023	Century House is an 8 storey former factory and warehouse in the Federation Warehouse style. The facade is polychrome brick with rusticated sandstone used for the ground and first floor, and above for lintels and cornices. The facade has a strong vertical emphasis deriving from the main brick piers which rise several floors, with the remainder of the facade recessed between them. Windows are timber framed, and the front entrance has a later (Interwar) surround and doors. Internally, the original structure has largely been concealed behind later finishes. However, many early (although possibly not original) internal elements survive including a birdcage lift, an early timber stair and a remnant of pressed metal ceiling. Category:Individual Building. Style:Federation Warehouse. Storeys:8. Facade:Polychrome brick & sandstone, timber frame windows, later entrance. Side/Rear Walls:Plastered brick, arched niches. Internal Walls:Plasterbd. & stud.

Site	Image	Description
		<i>Roof Cladding:Waterproof membrane. Internal Structure:Timber post & beam, concealed. Floor:Timber joists & boards, carpet. Roof:Not inspected; presumably as for floors. Ceilings:Susp. acoustic tiles. Stairs:1 timber stair with timber balustrade, elaborate design on ground and first floors, plain above. Fire Stairs:Refer Stairs above. Sprinkler System:Yes. Lifts:1 early birdcage lift, automatic operation; 1 more modern lift. AirConditioned:Yes.</i>
Commercial building 'Kelco House'/ Former Warehouse Including Interiors and Cart Docks 364-372 Kent Street I1824	 Source: Google Maps, 2023	<i>Kelco House is a former 6 storey warehouse in the Federation Warehouse style (a seventh storey was added in 1990). It has a typical face brick facade with sandstone used for the ground level wall, and also for sills, lintels, arches and cornice. Sills and cornice are of dressed stone; other stone elements are rock-faced. The central brick piers extend downwards into the stone base wall, and upwards above the cornice where they form a small pediment; between them on the top storey is the only arched opening of the facade above ground level. Windows generally are timber framed. Openings at ground level have been altered, in particular at the southern end where the former cart docks have become a colonnade to the main entrance. Internally the timber structure and floors survive and are exposed on some levels; elsewhere the original structure is concealed by modern finishes. Category:Individual Building. Style:Federation Warehouse. Storeys:7. Facade:Face brick & sandstone, timber frame windows. Side/Rear Walls:Face brick. Internal Walls:Plasterbd. & stud. Roof Cladding:Corrugated steel sheet. Internal Structure:Timber post & beam. Floor:Timber joists & boards. Roof:Possibly steel frame. Ceilings:Susp. acoustic tiles, plasterbd. (entrance). Stairs:Refer fire stairs. Fire Stairs:Steel frame, precast conc. treads, plasterbd. & stud enclosure. Sprinkler System:Yes. Lifts:1 modern. AirConditioned:Yes FireStairs:Steel frame, precast conc. treads, plasterbd. & stud enclosure.</i>

Site	Image	Description
Former maritime building facade 'CMC House' 160-166 Sussex Street 11962	 Source: Google Maps, 2023	The former CMC house is now a three storey facade attached to the base of a 14 storey office building. The facade is of painted stucco, with aluminium framed windows to the upper storeys, a balustrade at the top, and plain openings at the base forming a colonnade and driveway entrance. The facade of the building above is set back less than one metre behind the old facade, and apart from having similar bay widths bears no relationship with the original. Category:Building Element. Style:Victorian Italianate. Storeys:3. Facade:Rendered brick, stucco detailing. Side/Rear Walls:Reinf. conc. frame, conc. block (1990). Internal Walls:Reinf. conc., conc. block, plasterbd. & stud (1990). Roof Cladding:Corrugated steel street, waterproof membrane (1990). Internal Structure:Reinf. conc. column & beam (1990). Floor:Reinf. conc. slab (1990). Roof:Reinf. conc. slab, steel framing (1990). Ceilings:Susp. acoustic tile, susp. plasterbd. (1990). Stairs:Refer fire stair (1990). Fire Stairs:Reinf. conc. (1990). Sprinkler System:Yes. Lifts:3 (1990). AirConditioned:Yes

3. HISTORICAL OVERVIEW

The following histories are extracted from the history section of Urbis' Historical Archaeological Impact Assessment, submitted under separate cover as part of the Planning Proposal. Full referencing is provided in that report.

3.1. AREA HISTORY

The area was an expansive military precinct in its early history after European settlement. Kent Street itself, initially known as “Soldier’s Back Row”, was likely undeveloped during the early 19th century, and possibly emerged after Lesueur’s 1802 map of Sydney was completed. By 1809, lease agreements were allocated to soldiers, and the street was formalised into Kent Street in 1810. It boomed, and historical mapping from 1821 shows that by this time, the formalised streetscape of modern Sydney had largely developed. The structures assumably were a mixture of residential and commercial premises, with city markets and Cockle Bay wharf nearby.

The area was described by Macle hose in his *Picture of Sydney and Stranger’s Guide in N.S.W. for 1839* as an established commercial hub and chief maritime gateway, which Macle hose describes as:

*the main thoroughfare between the wharfs, warehouses, flour mills, shipbuilding yards and manufactories, which are positioned between it and Darling Harbour- and perhaps for its length, has more valuable merchandise and other property conveyed through it than any other street in Sydney.*¹

Being situated between the local economy of the market district and the international economy of the wharves defines this area’s history. By the 1830s and 40s, the nearby Wynyard Military Barracks were seen as inappropriately located, and so Victoria Barracks took its role in 1848. Civilian land holdings on Kent and Sussex streets increased in this time, and further subdivisions were drawn.

3.2. SITE HISTORY

By 1823, the future site had been formally subdivided into lots and granted to several landowners, such as Thomas Moore, Arthur Little, Samuel Clymm, Mary Bone and William Birch. It was likely used for mostly residential purposes, with workshops and detached structures for the next few decades. It featured mostly brick and stone constructions, being inferred from 1833 City Section Survey Plans and later detail plans. By 1842, Thomas Bowen occupied Bone’s property, and developed the holding significantly so that by 1955, it held two rectangular brick structures with associated fencing that encompass much of the lot’s Kent St frontage. The western boundary of the lot was built-up with three rectangular brick buildings with fenced yard spaces and outbuildings.

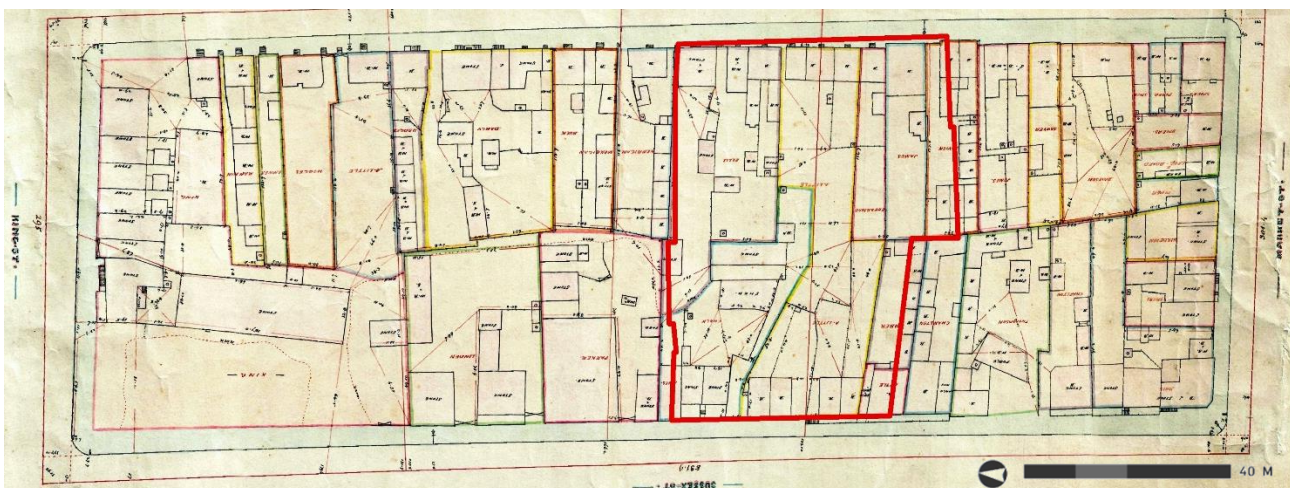


Figure 21 – 1855 Detail Plan of Section 29, showing the extent of development within the subject site at this time (outlined in red), including service connections to outbuildings.

Source: City of Sydney Archives 1855, A/00880278

¹ Macle hose, *Picture of Sydney and Strangers' Guide in N.S.W. for 1839*, 1977, page 61.

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Over the ensuing decades, lots were bought and sold over the site and buildings constructed for business and residential purposes. This included two four-storey symmetrical brick buildings with a bridging archway at 154-156 Sussex Street likely constructed around 1865-1880, and a double-storey building with a fenced garden and two wooden outbuildings at 377 Kent Street that was residential during the 1880s and commercial from the 1890s. Importers, grain merchants, produce agents, blacksmiths and a hotel were some of the uses for lots within the subject site from the late 19th and early 20th centuries.

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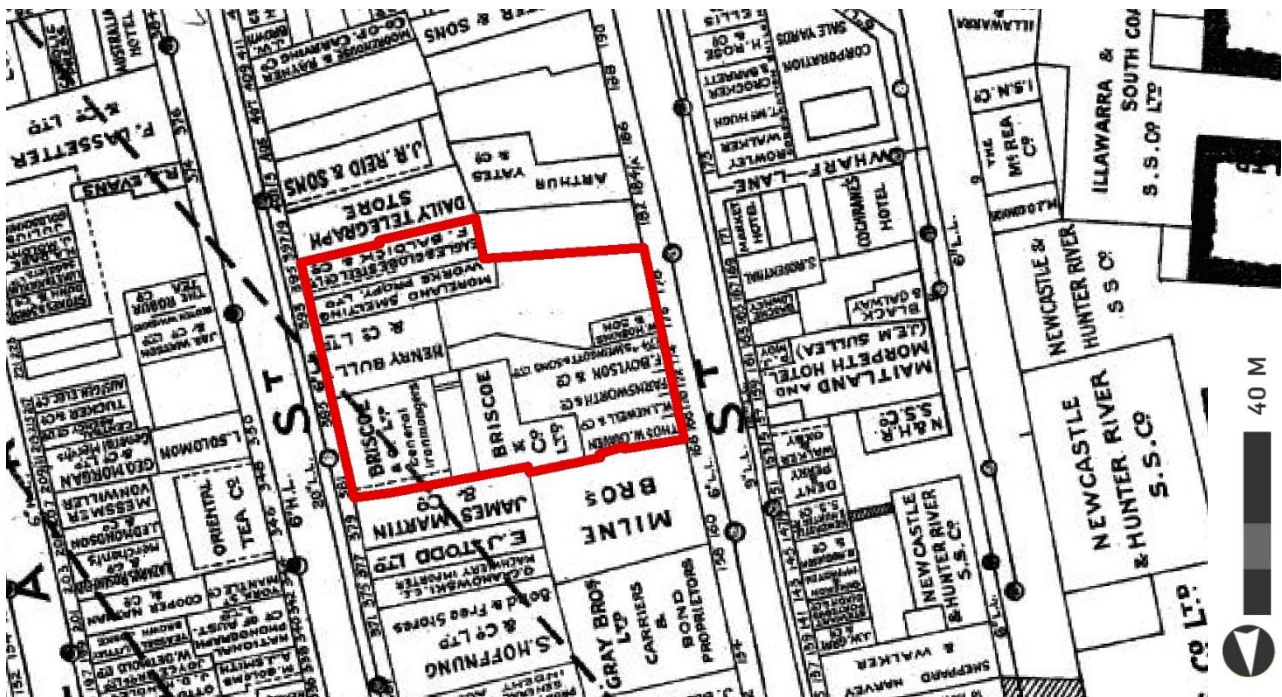


Figure 23 – City of Sydney Plan of Central Sydney from 1910, showing the subject site in red
Source: City of Sydney Archives 1910, A/00880476

In February 1976, when the site was a densely populated mix of warehouses and commercial buildings, a Development Application was lodged to demolish all properties on the site to build a public parking facility holding around 1000 spaces. It was approved in September that year and built shortly after.



Figure 24 – Historic aerial image of Central Sydney from 1986, showing the subject site outlined in red. Note that at this time, the carparking station is now visible, occupying the entire extent of the lot.
Source: NSW Historical Imagery Viewer 1986, ID/ 3528_22_061

In April 1998, the Development Application for the current site was submitted by Leighton Properties Pty Ltd to add a 14-level commercial office tower onto the existing carpark.

3.3. HERITAGE ITEMS IN THE VICINITY

Historical overviews are provided below for the heritage items in the vicinity of the site. These histories have been reproduced from the NSW State Heritage Inventory.

Note that the historical overviews for all items include the following introduction:

The "Eora people" was the name given to the coastal Aborigines around Sydney. Central Sydney is therefore often referred to as "Eora Country". Within the City of Sydney local government area, the traditional owners are the Cadigal and Wangal bands of the Eora. There is no written record of the name of the language spoken and currently there are debates as to whether the coastal peoples spoke a separate language "Eora" or whether this was actually a dialect of the Dharug language. Remnant bushland in places like Blackwattle Bay retain elements of traditional plant, bird and animal life, including fish and rock oysters.

With the invasion of the Sydney region, the Cadigal and Wangal people were decimated but there are descendants still living in Sydney today. All cities include many immigrants in their population. Aboriginal people from across the state have been attracted to suburbs such as Pyrmont, Balmain, Rozelle, Glebe and Redfern since the 1930s. Changes in government legislation in the 1960s provided freedom of movement enabling more Aboriginal people to choose to live in Sydney.

(Information sourced from Anita Heiss, "Aboriginal People and Place", Barani: Indigenous History of Sydney City <http://www.cityofsydney.nsw.gov.au/barani>)

Table 2 – Historical overview – heritage items in the vicinity

Site	History
I1826 367-371 Kent St: Former commercial building facade 'Metropolitan Business College'/ Former Warehouse Façade (367- 371 Kent Street)	The warehouse at 367-371 Kent Street was first occupied in 1903 as the bond and free stores of S Hoffnung & Co Ltd, general importers and merchants of 165-169 Pitt Street and with a wharf in Hoffnung's Wharf Road. The owner of the property was William Moffit. Work was required on the building in 1938 after a fire. There may also have been a replacement of a column or columns in an unspecified area of the ground floor in 1976. Applications to Council for internal changes reflect the way in which the building was adapted to other uses when economic and technological changes reduced the need for warehouses in the centre of the city; the third and fourth floors were used as a showroom and factory for manufacturing ladies dresses, premises for (unspecified) sales, general offices and showrooms.
I1827 373-377 Kent Street: Former commercial building facade 'Seabridge House'/ Former Warehouse Façade (373-377 Kent Street)	New Century Press, both owner and occupier of the property was first recorded at this address in 1923. Prior to that, the Press had functioned from further along Kent Street. The building was constructed of concrete with an iron roof, with five floors and five 'rooms'. The architects were W Kenwood and Son. In 1928 the Press sold the property to Alfred Angel Catts. By the 1930s two of the floors were occupied by advertising agents Catts-Patterson. New Century Press moved to a new building in York Street in the mid-1930s. Council records distinguish in some cases between 373-377 Kent Street and 375-377 Kent Street. In the former case there is the record of a 'fit out' of offices on four floors in 1987 and lesser changes in 1986, in the latter case a number of minor changes. The building has been known as Seabridge House. In December 1995 Meriton Properties Pty Ltd bought No's 365 and 367 Kent Street. In March of the following year the company also acquired Seabridge House. At the time the five storey building was vacant.
I1825 365 Kent Street: Former commercial building facade 'Waratah House'/	The person or company responsible for the construction of the building is not known. The warehouse was most likely constructed in 1901 and by September of that year was the property of William Frederick Lawson. It was of brick construction with an iron roof and consisted of six undivided

Site	History
Former Warehouse Façade (365 Kent Street)	<i>floors. S A Joseph and Rickard Limited, merchants and importers, Rickard's Bond, took occupancy in 1901. Changes to the building occurred in 1937 and again in 1957 when at least a proportion of the building was adapted for use as a broadcasting studio and offices. Tenants included the radio station 2UW. A major refurbishment was undertaken in 1982 at a cost of \$500,000 and in 1986 further changes were made by the Returned Services League for its uses as offices, library and committee rooms. Sydney Cityscope notes its present name is Anzac House.</i>
I1815 332-334 Kent Street: Former Warehouse/ Former Warehouse (332-334 Kent Street) Including Interiors	<i>The building stands on land granted to Anthony Best in 1835. In 1911, by which time the building had presumably been constructed, it was transferred to nine people, mostly member of the Hicks and Jones families (including Sydney Toogood Jones). Their descendants retained the property until 1978. In 1931, the building was reinstated after a fire; this is likely to be the time that the steel windows were installed in the facade. The 1964 alterations appear to have left the building basically as it is at present, apart from the interconnection to 336-338 Kent Street which occurred in 1987 after the building had been bought by Merchant & Partners.</i>
I1816 336 Kent Street: Former Warehouse/ Former Warehouse Including Interiors, Cartway and Courtyard	<i>This building may have been constructed in two parts beginning with 338 Kent Street in 1887 and 336 Kent Street in the following year. The building was initially used by a variety of merchants apparently for warehouse purposes. Throughout the later years of the 19th century and into the 20th century it was occupied by a number of merchants as well as small businesses including printers and book-binders. In addition it served as storage space for the Catholic Press Newspaper and Sydney Cardboard Co. There are no available details with respect to alterations to the building fabric.</i>
I1820 342-344: Former warehouse 'Royston House'/ Former Warehouse Including Interiors	<i>Royston House stands on land originally granted to Henry Hitchcock in 1839. The original title for this property was issued in 1891 to Robert Matcham Pitt, stock & station agent, and shows a different arrangement of buildings on the land. Mr Pitt took out a mortgage in 1891 on which he presumably defaulted, as the London Chartered Bank of Australia resumed the land and transferred it to James Channon in 1901. The likely date of construction of the building lies within this period, suggesting that Robert Pitt may have taken out the mortgage to fund the construction of a new building. The property passed to Ellen Marie Rabone in 1902, and remained with the Rabone family until 1922 when it was sold to Fanny Johnson. Subsequent owners were Cecil Paroissen Johnson (1939) and George Salter & Co (1950).</i>
I1819 338 Kent St: Former commercial building 'Guild House'/ Former Warehouse Including Cartway, Courtyard	<i>The buildings at 197-199 Clarence Street and 340 Kent Street stand on land granted to Anthony Best and Thomas Fuller in 1835 and 1838. The land was a single block running between Kent and Clarence Streets. The buildings were constructed about 1906 to designs by Roberston & Marks, architects, and must have had a yard between them, with deliveries possible only from Kent Street. The Clarence Street building was known</i>

Site	History
and Interior (formerly 340 Kent Street)	as the W Horace Friend Warehouse. In the 1920s, the property was owned by members of the Hinton family, and tenants of the buildings included Jackson & Spring (197 Clarence), Burgin Electric Co (340 Kent), and Bedgood & Co (199 Clarence). In 1954 the property was divided, the Clarence Street building being transferred to Hazel Shay Hugo, and the Kent Street property to J & W Stuart.
I1821 346-348 Kent St: Commercial building 'Letraset House'/ Former Warehouse Including Interiors, Cartway, Courtyard and Interior	207 Clarence Street was constructed in about 1885 on land formerly occupied by housing, and granted to James Spears in 1835. The land was purchased in 1881 by William Henry Paling, and later that year was transferred to the Anglo-Australian Investment, Finance and Land Company, Limited (of which Paling was a director), together with the other allotments on which Letraset House (346-348 Kent St) and 201-205 Clarence St now stand. The whole group is believed to have been constructed at about the same time and designed by the same person. Early occupants included Hickham & Martin and Messmer Vonwiller & Co. In 1893, the properties were transferred to William Henry Hinton and John See (later Sir John See, premier of NSW), and to John See alone in 1896.
I1822 352-358 Kent St: Former commercial building 'Norton House'/ Former Warehouse Including Interiors	The land on which AME House stands was part of a grant to Allan Barbour Michie in 1838. In 1909 the land was transferred to Alexander and Robert Amos, who sold it in 1910 to John Frederick Utz, merchant. It was for Utz that Spain Cosh & Minett prepared drawings for the new warehouse in 1911, and the building was presumably constructed shortly afterwards. In 1913 the property was transferred to the Perpetual Trustee Co Ltd which held it until 1950. The building was converted to offices in 1970 and extensively refurbished and strata titled in 1985.
I1823 360-362 Kent St: Commercial building 'Century House'/ Former "Hordern" Warehouse Including Interiors	Century House stands on land first granted to James McKay in 1842. In 1909 the property was transferred from Alexander and Robert Amos to Eva Connell Hordern, wife of Cecil Hordern, gentleman. In the same year, plans for the present building were prepared by John B Spencer architect, and construction was probably completed later that year. The property then passed to Esther Balkind (1922), members of the Jackson & McDonald families (1926 and 1948) and to Howard F Hudson Pty Ltd (1953). In 1926 and again in 1941 applications were lodged to reinstate the building after fire. The latest refurbishment was completed in 1985.
I1824 Commercial building 'Kelco House'/ Former Warehouse Including Interiors and Cart Docks	J A D Gibson and Co took a lease on the property in 1934, and continued in occupation until 1977. The property then passed to Bushells Pty Ltd and a number of subsequent owners. It was fully refurbished in 1990.
I1962:160-166 Sussex St: Former maritime building facade 'CMC House	The land on which this building stands was part of a Crown grant to Thomas Norton James and John Riddell. The earliest title for the property dates from 1939, when the AMP Society acquired the site. The building appears from physical evidence to have been constructed around 1890. The building was demolished except for the facade in 1990.

4. HERITAGE SIGNIFICANCE

4.1. WHAT IS HERITAGE SIGNIFICANCE?

Before making decisions to change a heritage item, an item within a heritage conservation area, or an item located in proximity to a heritage listed item, it is important to understand its values and the values of its context. This leads to decisions that will retain these values in the future. Statements of heritage significance summarise the heritage values of a place – why it is important and why a statutory listing was made to protect these values.

For this development, the significance of the heritage items in the vicinity is being considered, for reference to how the development will relate to these. The statements of significance for these items (presented below) have been reproduced from NSW State Heritage Inventory

4.2. STATEMENTS OF SIGNIFICANCE

Table 3 – Heritage significance – heritage items in the vicinity

Site	Significance
Former commercial building facade 'Metropolitan Business College'/ Former Warehouse Façade (367-371 Kent Street) 367-371 Kent Street I1826 Local significance	<i>367-371 Kent Street has aesthetic significance as an intact example of the Federation warehouse style and as part of the 'Kent Street Wall' group, of modestly-scaled buildings in traditional construction ranging in architectural style from Victorian Free Classical through Federation Warehouse to Inter-War Free Classical. The irregular but similar height of buildings in this warehouse group contributes to their streetscape value which is also enhanced by the traditional nature of their forms, textures, colours and details. The facade and timber structure are representative of the Federation Warehouse style. It has historic significance as part of a cohesive collection of former warehouses in an area of Sydney which once abounded with buildings of this kind.</i>
Former commercial building facade 'Seabridge House'/ Former Warehouse Façade (373-377 Kent Street) 373-377 Kent Street I1827 Local significance	<i>373-377 Kent Street has aesthetic significance as an intact example of the Inter-War Free Classical/Chicagoesque warehouse style and as part of the 'Kent Street Wall' group, moderately-scaled buildings ranging in architectural style from Victorian Free Classical, through Federation Warehouse to Inter-War Free Classical. The irregular but similar height of buildings in this warehouse group contributes to their streetscape value which is also enhanced by the nature of their forms, textures, colours and details. It has historic significance as part of a cohesive collection of former warehouses in an area of Sydney which once abounded with buildings of this kind. The building has scientific significance as a comparatively intact example of an Inter-War concrete frame building exhibiting tentative Chicagoesque stylistic expression. It is possibly an early surviving example of a concrete-framed warehouse.</i>
Former commercial building facade 'Waratah House'/ Former Warehouse Façade (365 Kent Street) 365 Kent Street	<i>365 Kent Street has aesthetic significance as an intact example of the Federation warehouse style and as part of the 'Kent Street Wall' group, moderately-scaled buildings in traditional construction ranging in architectural style from Victorian Free Classical through Federation Warehouse to Inter-War Free Classical. The irregular but similar height of buildings in this warehouse group contributes to their</i>

Site	Significance
I1825 Local significance	<i>streetscape value which is also enhanced by the traditional nature of their forms, textures, colours and details. The facade and timber structure are representative of the Federation Warehouse style. It has historic significance as part of a cohesive collection of former warehouses in an area of Sydney which once abounded with buildings of this kind. The cartway provides evidence of how these warehouse buildings were once serviced.</i>
Former Warehouse/ Former Warehouse (332-334 Kent Street) Including Interiors 332-334 Kent Street I1815 Local significance	<i>The Merchant & Partners building at 332-334 Kent Street has historic significance as apparently one of the earlier buildings in the Kent Street warehouse precinct which developed as an adjunct to Darling Harbour. It has aesthetic significance as a well detailed composition in the Victorian Italianate style which contributes to the character of the warehouse precinct.</i>
Former Warehouse/ Former Warehouse Including Interiors, Cartway and Courtyard 336 Kent Street I1816 Local significance	<i>332 (previously 336-338) Kent Street reflects the association of this part of the city with concentrated warehousing throughout the 19th century and up to the Inter-War period. It also documents the major redevelopment of the city during the later decades of the nineteenth century, and is considered of local significance.</i> <i>The building represents a restrained use of Classical detailing for a utilitarian building which contributes to the townscape character of Kent Street. The apparent lightness of the façade reflects the simple internal framed structure however its original architectural quality has been diminished by the painting of the external face brickwork. It has aesthetic significance as having an intact cartway and courtyard, one of the few remaining in Sydney.</i> <i>Together with the adjoining building at 332-334 Kent Street, the scale, form and detailing of the Merchant and Partners building contribute to the townscape quality of Kent Street.</i>
Former warehouse 'Royston House'/ Former Warehouse Including Interiors 342-344 Kent Street I1820 Local significance	<i>Royston House has aesthetic significance as a good and substantially intact example on a small scale of the early Federation Warehouse style, with echoes of the earlier Queen Anne style. The building contributes to the streetscape of Kent Street as part of a cohesive group of late 19th and early 20th century former warehouses between King and Market Street. It has historic significance as a physical reminder of the demand for warehouses following the 1890s depression which led to the redevelopment of the western side of Sydney as a warehouse precinct. High Significance: Face brick and sandstone façade and other walls, timber floor and roof structures, stairs and windows, ripple iron ceilings.</i>
Former commercial building 'Guild House'/ Former Warehouse	<i>The former warehouse building at 340 (now 338) Kent Street, together with the former warehouse building at 197-199 Clarence Street, has aesthetic significance as a fine example of the</i>

Site	Significance
Including Cartway, Courtyard and Interior (formerly 340 Kent Street) 338 Kent Street I1819 Local significance	<i>Federation Warehouse style with bold Romanesque detailing. The two buildings contribute to the streetscape of Clarence and Kent Streets. They have historic and scientific significance as physical reminders of a once common pattern of development in Sydney, involving the construction of two warehouses facing parallel streets, with a yard between, and of the proliferation of warehouse construction in the western precinct of Sydney during the late 19th and early 20th century. The pair is one of about three such groups remaining, the best example being the Letraset House group. The buildings are also associated with the well-known Sydney architects Robertson & Marks.</i>
Commercial building 'Letraset House'/ Former Warehouse Including Interiors, Cartway, Courtyard and Interior 346-348 Kent Street I1821 Local significance	<i>207 Clarence Street, together with the internal courtyard at the rear and the neighbouring buildings at 346-348 Kent Street and 201-205 Clarence Street (referred to as the Letraset House group), has historic, aesthetic and scientific significance deriving from its unique ability to evoke the character of, and demonstrate in one place the type of construction, pattern of development and use of commercial buildings in Sydney in the late 19th century. This group is the best example in Sydney of this pattern of development which was once common. The Letraset House group has aesthetic significance deriving from the architectural composition of the polychrome face brick and render facades.</i> <i>The Evaluation of Significance below refers to the Letraset House group of buildings including the courtyard.</i> <i>High Significance: Configuration of building (with 346-348 Kent Street and 205-207 Clarence St) and courtyard</i> <i>Street façade, especially timber door case and fanlights, and courtyard façade (excluding windows). Low Significance: Basement, ground, first, second and third floor spaces</i> <i>Street entrances and lobbies.</i> <i>Concrete structure and stairs, and aluminium windows.</i>
Former commercial building 'Norton House'/ Former Warehouse Including Interiors 352-358 Kent Street I1822 Local significance	<i>AME House has aesthetic significance as a good and substantially intact example of the transition from the Federation Warehouse to Federation Free style in warehouse design. The building contributes to the streetscape of Kent Street as part of a cohesive group of late 19th and early 20th century former warehouses between King and Market Street. It has historic significance as a physical reminder of the proliferation of warehouse construction in the western precinct of Sydney during the late 19th and early 20th century, and is associated with the well-known Sydney architects Spain, Cosh & Minett.</i>
Commercial building 'Century House'/ Former "Hordern" Warehouse Including Interiors	<i>Century House has aesthetic significance as a good and substantially intact example of the Federation Warehouse style which contributes to the streetscape of Kent Street as part of a cohesive group of late 19th and early 20th century former warehouses</i>

Site	Significance
360-362 Kent Street I1823 Local significance	<i>between King and Market Street. It has historic significance as a physical reminder of the proliferation of warehouse construction in the western precinct of Sydney during the late 19th and early 20th century, and is associated with Sydney architect John Spencer who designed a number of buildings in this area.</i>
Commercial building 'Kelco House'/ Former Warehouse Including Interiors and Cart Docks 364-372 Kent Street I1824 Local significance	<i>Kelco House has aesthetic significance as a good and substantially intact example of the Federation Warehouse style. The building contributes to the streetscape of Kent Street as part of a cohesive group of late 19th and early 20th century former warehouses between King and Market Street. It has historic significance as a physical reminder of the proliferation of warehouse construction in the western precinct of Sydney during the late 19th and early 20th century.</i>
Former maritime building facade 'CMC House 160-166 Sussex Street I1962 Local significance	<i>The facade of the former CMC House has historic significance as a physical reminder of the former warehouse on this site. The facade is typical of a small warehouse of the late nineteenth century.</i>

5. IMPACT ASSESSMENT

Below, the potential impact of the proposal is assessed against the applicable heritage-related statutory and non-statutory planning controls which relate to the site and the Planning Proposal.

5.1. SYDNEY LEP 2012

The table below provides an assessment of the proposal against the relevant provisions for heritage conservation as found in the Sydney LEP 2012.

Table 4 – Assessment against Sydney LEP, part 5.10

Clause	Response
(1) Objectives	The Planning Proposal would not generate any material or physical impacts on any site which is identified as a heritage item under the Sydney LEP 2012. Descriptions and assessments of the significance of items in the vicinity of the site have been reproduced from the NSW State Heritage Inventory in Sections 2 and 4 of this HIS. These heritage items are evidence of the progressive development of the area for commercial purposes, especially warehousing, in the early 20th century. The Planning Proposal is considered to not affect the fabric, setting of views of the heritage significance of the area including the identified heritage items in the site's vicinity, noting that the reference scheme maintains a podium at the existing 6 storey scale. Continuing to use the space for commercial purposes is consistent with the historic character of the locality as a commercial area that connected the maritime economy at Darling Harbour with the local economy of Sydney CBD.
(2) Requirement for consent	The subject site is not a listed heritage item; however, consent is required for works in the vicinity of heritage items. The subject site is in the vicinity of numerous heritage items, as set out in section 1.3, comprising predominantly Federation warehouse development. This HIS assesses the potential impact of the Planning Proposal on the heritage items in the vicinity of the site. It is found that there would be no material or physical impacts on the vicinity items, and that their setting and context would not be adversely impacted by the proposed development. The established setting of these items is a dense urban area in a designated tower cluster zone, with surrounding high-rise buildings, and the proposed scheme would not obscure or interrupt this context. The Planning Proposal replaces a late 20th century high-rise building, of no heritage significance and the Planning Proposal envelope similarly responds to the immediate setting in the adoption of a similarly scaled podium and setback tower form.
(4) Effect of proposed development on heritage significance	This HIS has been prepared to assist the consent authority in its determination of the Planning Proposal on heritage grounds. This HIS has been prepared due to the location of the subject site in the vicinity of several listed heritage items. It is found that there would be no material or physical impacts on the vicinity items, and that their setting and

Clause	Response
	context would not be adversely impacted by the changes sought by the Planning Proposal. Extant development, being an amalgam of a lower scale podium building (1976) and tower (1998) is not of heritage significance and proposed demolition is supported on heritage grounds. The proposed envelope responds to the streetscape in the adoption of the lower scale podium and setback tower form. The below assessment considers heritage items in the immediate context, principally the former maritime building façade 'CMC House', 160–166 Sussex Street (local significance, I1962) which is immediately adjacent to the subject site and the former commercial building facade 'Seabridge House'/ Former Warehouse Façade (373-377 Kent Street), 373–377 Kent Street (local significance, I1827). The proposal also considers the Special Character Area, see DCP discussion below) and the general character of 19th and early 20th century warehouse development. In general, the proposal responds by adopting a lower scale podium and setback tower form. The scale of development on the Sussex Street frontage is more varied and the proposed podium envelope is generally consistent with the existing podium height and responds to the scale of extant development at 154 Sussex Street. It is acknowledged that the heritage listed façade to the north is a lower scale item (3 storeys) however only the façade is retained, and the building has been redeveloped with a contemporary tower with a minimal setback. The Kent Street frontage is more consistent in terms of scale and development, and generally comprises lower scale Federation warehouse development with some contemporary overlay. The PP podium aligns with contemporary development to the south and is not inconsistent with the scale of the group of heritage listed facades to the north of the site at 365-377 Kent Street including Seabridge House. The Planning Proposal allows for an intensification of development on a site which is of no heritage significance and has no further impact on the setting of the vicinity heritage items or the Character Area.

5.2. SYDNEY DCP 2012

5.2.1. Section 2 (Locality Statements)

The table below assesses the proposal against the relevant principles for the York Street Special Character Area including Clarence Street and Kent Street as found in Section 2 of the Sydney DCP 2012.

Table 5 – Assessment against Sydney DCP 2012, Section 2.1.1

Principle	Response
(a) <i>Development must achieve and satisfy the outcomes expressed in the locality statement and supporting</i>	Extant development is not of heritage significance and does not contribute to the character area.

Principle	Response
<i>general objectives for special character areas, in addition to the principles below.</i>	The proposed development in line with the Planning Proposal will not affect the ability of the area to attest to the development of the streets between Darling Harbour and the City Markets. The heritage listed warehouses and commercial buildings will not be materially or visually affected. The reference scheme shows a face brick podium which is consistent with the 3-8 storey range of heights associated with the surrounding buildings, in accordance with the locality statement. Any works are subject to a further Development Application and future development should consider an appropriate design response having regard for proximate heritage items, the York St/Clarence St/Kent St Special Character Area, podium scale, form and articulation as well as the predominance of face brick materiality. The proposal keeps the subject site in commercial and retail use, which is consistent with the character statement. The subject site does not include any evidence of internal cartways or courtyards, narrow frontages or other features that the character statement specifically seeks to preserve.
(b) <i>Maintain and reinforce the urban character and scale of the area by requiring development to:</i> i. <i>Have street frontage heights and building setbacks above street frontage heights, consistent with the prevailing scale and form of heritage items.</i> ii. <i>Respond to the historic warehouse and commercial typologies and materiality in the area.</i> iii. <i>Ensure new development is designed and sited to enhance the views and settings of heritage items within the area.</i> iv. <i>Maintain and enhance the historic fine grain subdivision pattern.</i>	The proposal replaces a late 20th century development (podium 1976/ tower 1998) and incorporates a similar podium envelope of 6 storeys, with the tower setback 8m from both frontages. The podium envelope is consistent with and responds to neighbouring development, specifically contemporary development to the immediate south of the site and the heritage item group to the north of the site at 365-377 Kent Street including Seabridge House. The podium is also generally consistent with the lower scale of warehouse development within the York St/Clarence St/Kent St Special Character Area which is typically between 3-8 storeys. Consistent with the streetscape, development is built to the Kent and Sussex Street frontages. As such the Planning Proposal meets the provisions with regard to sympathetic scale. There will therefore be no impact on the views to, and setting of, nearby heritage items as a result of the proposal. There are however opportunities to improve the contribution of the site to the streetscape and the Character Area, through a sympathetic podium design, having regard for form, scale and materiality. No further changes are proposed to the historic subdivision pattern. The site was consolidated for the 1976 carpark development.

5.2.2. Section 3 (General Provisions)

The table below assesses the proposal against the relevant objectives and provisions as found in Section 3 of the Sydney DCP 2012.

Table 6 – Assessment against Sydney DCP 2012, Section 3

Control	Response
3.9.5 Heritage items	
Objective	
(a) <i>Ensure that development in the vicinity of heritage items is designed and sited to protect the heritage significance of the item.</i>	There will be no material impacts on adjacent or nearby heritage items as a result of the Planning Proposal. The Planning Proposal seeks to replace the building on the subject site with a larger skyscraper occupying more floor space and reaching 42 storeys. By keeping a six-storey podium with setback tower, it does not alter the established setting and respects the scale and proportions of the surrounding heritage items and other historical buildings, noting that significant warehouse development in the Special Character Area typically varies between 3 and 8 storeys. While detailed design of a new built form on the site will be subject to a separate, future application, it is noted that the reference scheme shows a sympathetic approach to new development in the vicinity of heritage items owing to an appropriate podium treatment (with respect to scale, proportions, and materials).
Provisions	
(3) <i>Alterations and additions to buildings and structures and new development of sites in the vicinity of a heritage item are to be designed to respect and complement the heritage item in terms of the:</i> (a) <i>building envelope;</i> (b) <i>proportions;</i> (c) <i>materials, colours and finishes; and</i> (d) <i>building and street alignment.</i>	The new building will be taller than the present, but this will not alter the existing setting of the heritage items at the pedestrian level and will form part of an identified tower cluster zone. No changes are proposed to the street alignment, with the reference scheme showing a nil-setback from the Sussex and Kent Street frontages in keeping with surrounding development. The materials, colours and finishes of the final design will be subject to a future, separate development application following gazettal of the LEP amendments, however the treatment of the new building will be required to be complementary to the surrounding historical built forms and proximate heritage items. As detailed above, the massing is broken into a lower scale podium (6 storeys to Kent Street) with a setback tower form (setback 8m from both the Kent and Sussex Street frontages). Proposed podium scale is consistent with the varied scale of significant warehouse development.
(4) <i>Development in the vicinity of a heritage item is to minimise the impact on the setting of the item by:</i>	Future development on the property will replace an existing building that occupies the entirety of the lot. It does not encroach upon the surrounding heritage items, either physically or visually.

Control	Response
(a) <i>providing an adequate area around the building to allow interpretation of the heritage item;</i>	Established views to and from nearby heritage items will not be obscured, interrupted, or otherwise adversely impacted by the proposed development, noting that the proposed podium and setback tower form is consistent with the extant late 20 th century development.
(b) <i>retaining original or significant landscaping (including plantings with direct links or association with the heritage item);</i>	Detailed archaeological assessments have been prepared by Urbis and are provided under separate cover.
(c) <i>protecting, where possible and allowing the interpretation of archaeological features; and</i>	The site does not include significant site landscaping and development is sited over the whole of the lot.
(d) <i>Retaining and respecting significant views to and from the heritage item.</i>	

5.2.3. Section 5 (Specific Areas)

The table below assesses the Planning Proposal against the relevant objectives and provisions as found in Section 5 of the Sydney DCP 2012.

Table 7 – Assessment against Sydney DCP 2012, Section 5

Control	Response
5.1.1.2 Street frontage heights and street setbacks in Special Character Areas	
(a) <i>To ensure appropriate height transitions between development, heritage items and buildings in Special Character Areas as required by Clause 4.3 of Sydney LEP 2012.</i>	The Planning Proposal envelope shows RLs of 40.6m to Sussex Street and 44.4m to Kent Street. This is consistent with adjoining development to the south and the varied scale of lower scale warehouse development, which typically scaled between 3 and 8 storeys in the character area. The reference scheme presented with the Planning Proposal shows a 6-storey podium form at Sussex Street and a 5-storey podium form at Kent Street, consistent with the street wall comprising the listed early-20 th century warehouse buildings, and a setback tower form above. This will complement the nearby heritage items and form part of a lower scale podium of development, providing a more pedestrian scale to the street.
(c) <i>To ensure development is compatible with distinctive character and significance of each Special Character Area.</i>	The proposal has been discussed above in relation to the established character and significance of the Special Character Area, and is found to comply with the relevant objectives and controls.
(d) <i>To enhance the heritage significance of heritage items and their settings.</i>	The proposed changes to the LEP will not generate adverse heritage impacts and will maintain the established high-density character of the area. Nearby heritage items will remain visually distinct as important streetscape elements and will form part of a more pedestrian scaled podium of development

Control	Response
	in the streetscape The Planning Proposal is generally consistent with extant development, in terms of the podium although it allows for an increase in density to the tower form. This will not considerably alter the current setting of the streetscape and proximate heritage items. Importantly, redevelopment in line with the Planning Proposal (subject to a future DA) enables an improved streetscape contribution, with any proposed redevelopment being required to respond to the proximate heritage items and Character Area context.
<i>(e) To enhance existing public views and public vistas to heritage items and places of historic and aesthetic significance.</i>	No established significant views to heritage items will be impacted, noting that the new tower form will be set back from the site boundaries and the podium envelope is consistent with existing development. Views to the heritage items on Kent and Sussex Streets are available from the streets themselves and not from surrounding areas. There is no impact to these general streetscape views.
<i>(f) To ensure development has regard to the fabric and qualities of heritage items within Special Character Areas in respect of scale, form, modulation, articulation, proportion, street alignment, materials and finishes.</i>	The Planning Proposal envelope and reference scheme presents a 5- and 6-storey podium form with a set-back tower. This will respect the established scale of the pedestrian-level streetscape (especially with respect to nearby heritage items) while meeting the objectives of the tower cluster zone in which the site is located. A detailed design will follow as part of a future development application, in which built form, articulation, materiality and detailing will be considered. As outlined above, proposed future redevelopment has the potential to greatly improve the current streetscape contribution.
5.1.3 Heritage items, warehouses and special character areas	
<u>Objectives</u>	
<i>(a) To conserve heritage items in their entirety.</i>	The subject building is not a listed heritage item, and the proposal replaces a late 20 th century building of no heritage significance. The proposal will not generate any material or adverse visual impacts on nearby heritage items.
<i>(d) To ensure appropriate height transitions between development and heritage items as required by Clause 6.16 of Sydney LEP 2012.</i>	The Planning Proposal envelope and reference scheme shows a 6-storey podium form at Sussex Street and a 5-storey podium form at Kent Street, consistent with the street wall comprising the listed early-20th century warehouse buildings, and a set-back tower form above. This will provide sufficient visual separation between new development on the site and nearby heritage items. The heritage items will form part of a podium of more pedestrian scaled development.
<i>(f) To conserve the setting of heritage items by ensuring that new development</i>	The proposed changes to the LEP will not generate adverse heritage impacts and will maintain the established high-density

Control	Response
<i>respects and reinforces the significant scale, form, modulation, articulation, proportions, street alignment, materials and finishes of heritage items in the vicinity.</i>	character of the area. Nearby heritage items will remain visually distinct as important streetscape elements. A detailed design will follow as part of a future development application, in which built form, articulation, and detailing will be considered, however the envelope as proposed is consistent in terms of form, scale, height, street alignment and setbacks. .

5.1.3.2 Development adjacent to heritage items

<i>(1) New development adjacent to a heritage item should respect and reinforce the historic scale, form, modulation, articulation, proportions, street alignment, materials and finishes that contribute to the heritage significance of the adjacent heritage item.</i>	The reference scheme presented with the Planning Proposal shows a 6-storey podium form at Sussex Street and a 5-storey podium form at Kent Street, consistent with the street wall comprising the listed early-20th century warehouse buildings. It is noted that the immediately adjacent heritage listed façade to Sussex Street (CMC House) is only three storeys, however that site has been redeveloped and forms part of a contemporary high-rise development which has altered the scale of the building. The proposed envelope is consistent with significant development in the Character Area which varies between 3 and 8 storeys.
<i>(2) Consideration must be given to the impact of adjacent development on the significance, setting, curtilage, landmark values and ability to view and appreciate the heritage item from Public Places.</i>	No established significant views to heritage items will be impacted, noting that the new tower form will be set back from the site boundaries. Views to the heritage items on Kent and Sussex Streets are available from the streets themselves and not from surrounding areas and are not altered by the subject proposal. As detailed above, the proposed envelope incorporates a lower scaled podium consistent with the streetscape and more pedestrian in scale.

5.3. HERITAGE NSW GUIDELINES

The proposed works are addressed in relation to relevant questions posed in Heritage NSW's 'Statement of Heritage Impact' guidelines.

Table 8 – Assessment against Heritage NSW guidelines

Question	Discussion
<i>The following aspects of the proposal respect or enhance the heritage significance of the item or conservation area for the following reasons:</i>	The Planning Proposal facilitates the removal of a multi-storey carpark which demonstrates a poor interface with the streetscape and heritage items in the site's vicinity. New development would allow for more useable / habitable floorplates at the podium, which would allow for an improved streetscape outcome. The new development is for commercial purposes, which is consistent with the significance of the surrounding area described in the Sydney DCP 2012. Extant development, being an amalgam of a lower scale podium building (1976)

Question	Discussion
	and tower (1998) is not of heritage significance and proposed demolition is supported on heritage grounds. The proposed PP envelope responds to the streetscape in the adoption of the lower scale podium and setback tower form. The proposal will not generate any material or adverse visual impacts on nearby heritage items. No established significant views to heritage items will be impacted, noting that the new tower form will be set back from the site boundaries. Views to the heritage items on Kent and Sussex Streets are made from the streets themselves and not from surrounding areas. The 5- and 6-storey podium form, at Kent and Sussex Streets respectively, is sympathetic to the street walls which comprise the listed heritage items early-20th century warehouse buildings. The setback tower form will maintain adequate visual and physical separation from nearby heritage items while demonstrating consistency with other contemporary developments in the locality. Importantly, redevelopment in line with the PP (subject to a future DA) enables an improved streetscape contribution, with any proposed redevelopment being required to respond to the proximate heritage items and Special Character Area context.
<i>The following aspects of the proposal could detrimentally impact on heritage significance.</i> <i>The reasons are explained as well as the measures to be taken to minimise impacts:</i>	No aspects of the Planning Proposal or future development facilitated by the planning control changes will generate adverse heritage impacts with respect to fabric, setting, or views.
<i>The following sympathetic solutions have been considered and discounted for the following reasons:</i>	None known. The proposal will not generate any adverse heritage impacts with respect to fabric, setting, or views. Importantly, redevelopment in line with the Planning Proposal (subject to a future DA) enables an improved streetscape contribution, with any proposed redevelopment being required to respond to the proximate heritage items and Special Character Area context.
<i>New development adjacent to a heritage item (including additional buildings and dual occupancies)</i> ▪ <i>How is the impact of the new development on the heritage</i>	The changes sought by the Planning Proposal will have no adverse or unreasonable impacts on adjacent or nearby heritage items, including on their fabric, settings, or views. This is as a result of the appropriately-scaled podium which will be consistent with the street wall of heritage items, as well as the setback tower form which will provide sufficient physical and visual separation above. However, this will also be contingent

Question	Discussion
<i>significance of the item or area to be minimised?</i> ▪ <i>Why is the new development required to be adjacent to a heritage item?</i> ▪ <i>How does the curtilage allowed around the heritage item contribute to the retention of its heritage significance?</i> ▪ <i>How does the new development affect views to, and from, the heritage item? What has been done to minimise negative effects?</i> ▪ <i>Is the development sited on any known, or potentially significant archaeological deposits? If so, have alternative sites been considered? Why were they rejected?</i> ▪ <i>Is the new development sympathetic to the heritage item? In what way (e.g. form, siting, proportions, design)?</i> ▪ <i>Will the additions visually dominate the heritage item? How has this been minimised?</i> ▪ <i>Will the public, and users of the item, still be able to view and appreciate its significance?</i>	upon a future development application and detailed design of the tower. A detailed design will follow as part of a future development application, in which built form, articulation, materiality and detailing will be considered. As outlined above, proposed future redevelopment has the potential to greatly improve the current streetscape contribution. Archaeological assessment is subject to a separate report prepared by Urbis.

6. CONCLUSION & RECOMMENDATIONS

6.1. GENERAL CONCLUSION

This HIS has been prepared to accompany a Planning Proposal which seeks to amend the site's maximum Height of Building development standard and maximum Floor Space Ratio (FSR) development standard to unlock additional floor space to be used exclusively for employment generating land uses, consistent with the vision and intent of the Central Sydney Planning Strategy (CSPS) for tower cluster sites. This Planning Proposal will also seek to facilitate significant public benefits through additional site activation by way of a new through-site link, shared basement loading dock facility and delivering on sustainable initiatives to contribute to the City of Sydney's vision to achieve net zero energy buildings. The HIS is required as the site is located in the vicinity of a number of heritage items which are listed under Schedule 5 of the Sydney LEP 2012. The assessment of impact carried out in Section 5 of this report has found that the proposal is supportable on heritage grounds for the following reasons:

- There will be no material impacts on any heritage items.
- There are no identified views of significance to nearby heritage items which would be affected by the proposed planning control changes for the site.
- Development in line with the Planning Proposal facilitates the removal of a multi-storey carpark which demonstrates a poor interface with the streetscape and heritage items in the site's vicinity. New development would allow for more useable / habitable floorplates at the podium, which would allow for an improved streetscape outcome.
- The new development is for commercial purposes, which is consistent with the significance of the surrounding area described in the Sydney DCP 2012.
- The reference scheme shows a 5- and 6-storey podium which responds to the street walls at Kent and Sussex Streets (respectively) and, therefore, will maintain the consistency of built forms with respect to the pedestrian experience within the Special Character Area.
- The new tower form will include setbacks at all sides from the property boundary / podium below, in order to maintain appropriate visual separation from the nearby heritage items and other tall-scale forms in the locality. Extant development, being an amalgam of a lower scale podium building (1976) and tower (1998) is not of heritage significance and proposed demolition is supported on heritage grounds. The proposed new envelope responds to the streetscape in the adoption of the lower scale podium and setback tower form.
- The Planning Proposal allows for an intensification of development on a site which is of no heritage significance and has no further impact on the setting of the vicinity heritage items or the Special Character Area.

On the basis of the above, the proposal is therefore recommended for approval on heritage grounds, having regard for the recommendations made below.

6.2. RECOMMENDATIONS

Notwithstanding the positive assessment made in this HIS, the following is recommended to be incorporated into a future detailed design in order to best respond to the site's surrounding heritage context:

- Any works are subject to a further Development Application and future development should consider an appropriate design response having regard for proximate heritage items, the York St/Clarence St/Kent St Special Character Area and the predominance of face brick materiality.
- Future development on the site should be designed in a manner which responds to the predominant characteristics and detailing of surrounding heritage items, with particular reference to the podium scale and materiality. This includes the use of sympathetic materials, introduction of a solid-to-void ratio which responds to traditional detailing, and a general response to the historic fine-grain subdivision pattern of the locality.

DISCLAIMER

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