



**ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000**

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Urbis Pty Ltd
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19 June 2019

Ms Samantha Miller
Principal - Planning
Ethos Urban
173 Sussex Street,
Sydney NSW 2000

Dear Samantha ,

RE: ADAPTIVE REUSE OF THE BREWERY BUILDINGS (SSD-9734) - TEST OF ADEQUACY

The following is provided in response to the Correspondence received from the Department of Planning and Environment, which was in turn, provided in response to the submission for the Test of Adequacy. In that correspondence, the Department notes that:

*"...the proposal exceeds the maximum gross floor area (by 2396m² or 59.9%) and building heights (by 3.68m or 13%) prescribed by the Concept Approval (MP06_0171). While acknowledging arguments have been made within the Environmental Impact Statement to support the exceedances, the Department considers the proposal as currently envisaged to be inconsistent with the Concept Approval and therefore cannot be determined without concurrently modifying the Concept Approval."*¹

Department correspondence reiterated that the original Concept Approval envisaged the retention of the existing building heights of the Brewery Yard buildings and the retention of the existing roof forms to buildings 22 and 26 and further refers to the Special Element Conservation Plan (SECP) prepared by Urbis (2009) and relevant policy therein (namely policy 27 which refers to the retention of the roof of building 22/23). Hence the proposed increase in height and GFA requires a compelling justification for the proposed modification, noting the intent of the original concept approval.

Urbis prepared a Heritage Impact Statement and has assessed the potential heritage impacts of the proposed increase in heights and GFA. We provide the following response:

The proposal maximises the potential floor space of the Brewery Buildings through adaptation of existing spaces and introduction of new levels. This includes provision of an additional mezzanine floor within building 23 and infill of the former void to building 30 with further floors, which has no impact on the external form of the building. In addition, the proposal does include a proposed roof top

¹ Correspondence from David McNamara (Director, Key Sites Assessments), the NSW Department of Planning and Environment (as delegate of the Secretary) to Ethos Urban, Re: *Adaptive Reuse of the Brewery Yard Buildings (SSD-9374) Test of Adequacy*, dated 17/04/2019

addition to building 22/23 which requires the removal of the gabled roof of building 22/23. Consistent with the concept approval, the roof of building 26 is retained.

Although the proposal provides for an increase in GFA and building height, the collective modifications have been designed in such a way to mitigate impacts on the significant fabric of the building, and to prevent visual impacts. The overall design solution has sought to mitigate impacts by locating additional GFA within the building footprint and envelope where possible, and designing additional areas to mitigate visual impacts externally as detailed below:

- The previous approval incorporated a large void at the northern section of building 30, above the first floor. The current proposal partially infills this void, to allow for much needed additional floor space including extension of levels 2 and 3 to the glazed northern façade and provision of a mezzanine floor on level 4 (setback from the glazed northern façade. The proposal necessitates the removal of the central coal hopper however retains the remaining 2 hoppers, and still provides for the interpretation of these elements, arguably in an improved form than the original scheme, as the scheme allows for closer interaction with the heritage fabric. The hoppers also remain able to be viewed from below.
- The proposed additional mezzanine to building 23 is offset from the windows and hence has no visual impact on the exterior of the building. It is similarly offset from the western wall to mitigate impacts on remnant fabric of the silos, to be retained on the wall. As a floating mezzanine within level 2, it is apparent as a contemporary insertion.

With regard to the proposed roof top addition to Buildings 22 and 23, although the proposal necessitates the removal of the gabled roof the proposed roof top addition provides for an additional 2 floors allowing additional required floor space to make this adaptive re-use project financially and practically feasible.

The proposed addition has been designed to mitigate impacts as follows:

- Floor-to-floor heights in building 22 have been reduced to enable an overall reduction in the height of additional floors above, whilst responding to façade elements including window openings. This is achieved through the off-setting of floor slabs to large arched windows instead of altering or bisecting them, thereby preventing intervention to the façade fabric. It is noted that the extant concrete structure to building 22 was replaced and is not of heritage significance. New floor levels are proposed to building 23 in conjunction with the removal of the silos.
- The roof addition has been designed to mitigate visual impacts, with the addition partly obscured behind the parapet and with the form modulated with a splayed roof to limit visibility in principal eastern and southern elevations, such that views to the addition are negligible or nil. Setbacks to the east and west of the addition similarly protect these views and ensure that the addition is obscured by the parapeted facades.
- It is acknowledged that the additional floors will be apparent in views from the north towards the northern elevation of Building 22/23 – however these are secondary, ‘rear’ views and this will not have a detrimental impact on the heritage values of the site. The addition will be distinct from the original masonry form of the building, and will comprise glazing and metal materiality to distinguish between the old and new and also to respond to the contemporary materiality of the trigen plant/

cooling towers. This materiality complements the industrial character of the original Brewery buildings and therefore is considered appropriate. This approach has been taken with all of the proposed additions. Removal of the existing gabled truss roof is unavoidable to facilitate this outcome, however this is mitigated by the retention and conservation of the gabled truss roof at Building 26. Overall the proposed addition is considered reasonable with consideration for the facilitation of future occupiable space, and the design efforts taken to mitigate visual impacts.

The subject proposal has been designed by Tzannes, who are responsible for the design of the tri-generation cooling tower atop Building 30 of the Brewery Buildings. Tzannes were the recipients of the 2016 Chicago Athenaeum International Architecture Award, and the 2016 UNESCO Heritage Award for New Design in Heritage Contexts for this work, as well as the Lachlan Macquarie Award for Heritage at the 2015 National Architecture Awards. This SSSA proposal sees the continuation of high quality architectural design and innovative approaches on the Brewery Building project. Urbis have had extensive involvement in the site, having collaborated with Tzannes on stage 1 and also authoring a number of reports for the site, including the conservation plan.

The proposal is seeking an increase in floor space to deliver a viable future use for the subject Brewery Buildings. The subject site occupies a central location within a thriving urban environment, and modification of the buildings is required to facilitate the practical future use of the buildings.

Overall, the proposed increased floor space is considered acceptable with consideration for the revitalisation of the precinct and the facilitation of future use. Without providing a functional space and viable future use, the subject Brewery Buildings would remain unoccupied, underutilised, and this would likely result in the degradation of significant fabric. It is noted that the buildings have been vacant since the closure of the brewery in 2005. The brewery is the most significant building on site yet also remains the only building still in derelict condition (other than the works for the trigen) and which does not have a defined adaptive reuse. Various proposals have been considered and have not proceeded for economic reasons.

Whilst there is some intervention to heritage elements in the scheme (including the removal of the gabled roof of building 22/23) a careful balance of conservation and modern intervention has been achieved with the current proposal, which seeks to provide a feasible outcome for the use of the space, but also embraces and celebrates the site's history through interpretation and retention of significant fabric and mitigating design. It is considered that the overall design and mitigation of impact has resulted in an acceptable level of heritage impact. Practical solutions to the ongoing occupation of these buildings have been carefully considered with regard to minimising adverse impacts and looking for ways to celebrate and interpret the history of the place.

The above provides a justification for the proposed modification and variances to the concept plan. A Heritage Impact Statement was prepared by Urbis (May 2019) and submitted with the Statement of Environmental Effects (SEE). That document in turn references the Special Element Conservation Plan also prepared by Urbis and further is cognisant of the former concept plan approval. Reference should be made to that document for the full heritage impact assessment.



If you have any questions please don't hesitate to contact me on 02 8233 7610.

Yours sincerely,

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Fiona Binns
Associate Director