



Sydney2030 Green/Global/Connected



ATTACHMENT A

Millers Point Planning Proposal Urban Landscape Study

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Millers Point Planning Proposal

Urban Landscape Study - Executive Summary

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Background and scope

This study provides evidence to support the Planning Proposal to amend the FSR and building height controls for the Millers Point and heritage conservation area precinct under the Sydney LEP 2012. It considers the implications for the built fabric of the precinct in the event that the current 2:1 FSR and 9.0 m building-height limit were to be fully exploited by future development.

The Millers Point conservation area comprises 297 built sites. A core group of 35 sites was selected for floor space studies. The findings were then applied to an expanded group of 96 related sites, and the data from this was then extrapolated across another 130 sites. 36 sites were excluded from the study.

A visual survey of the precinct identified a number of publicly-accessible vantage points across Millers Point and the harbour, from which the study sites are visible. An assessment was made on the likely impact on the urban landscape that development would have.

Key findings

Results of the floor space studies were grouped into five bands, according to how much additional floor space is permitted as a proportion of existing floor space. The findings are summarised in this table:

Band	Effect	Floor space change	No. sites affected
E	Severe	+91~320%	15% sites
D	Adverse	+49~90%	46% sites
C	Significant	+15~48%	11% sites
B	Moderate	+3~14%	4% sites
A	Minimal	+0~2 %	12% sites
--	not included in study		12% sites

72 percent of the sites studied are predicted to be significantly, adversely or severely affected by an FSR of 2:1. Built form studies (pp. 12-15) show these heritage items would be greatly compromised. Of the ten street groups that comprise the study area, the rear elevations of all but three are visible in close, middle or far proximity.

The urban landscape of the precinct is intricate, diverse and intimately tied to its physical terrain, its social and functional history. The findings show that current FSR and building-height controls are too simplistic, and incapable of effectively managing change to the precinct's unique, highly visible, and largely intact built form in the face of future development. Individual conservation management plans can offer the finer-scale controls that are called for in such a complex and important urban landscape.



Fig. 1: Millers Point viewed from Observatory Hill. Argyle Place, Lower Fort Street and the Garrison Church (at right) are visible in the foreground.



Fig. 2: Millers Point looking west from Harbour Bridge.

Introduction

Precinct significance

Millers Point and Dawes Point Urban Landscape

The precinct of Millers Point and Dawes Point is unique in the urban landscape of Sydney. It is a highly visible part of the city, and occupies a prominent place in its cultural and historical landscape.

The statements of significance attached to the Millers Point Planning Proposal discuss the values of this precinct at length. Its sandstone outcrops and terraces dominate the point, testifying to the city's underlying geology. A terraced network of streets and lanes runs around the peninsula, counterpointed by rock cuttings and stairways set into its topography. Its indigenous significance is evidenced by extensive archaeological resources, historical records and geographical place names.

The fabric of Millers Point illustrates the key phases of Sydney's history from colonial to mid-twentieth-century times. Colonial settlement patterns are reflected in its walking-scale, low-rise village, the central green of Argyle Place and a range of nineteenth-century buildings. The public housing, shops, pubs and infrastructure that developed subsequent to early 20th-century plague remains intact. These stand as testament to the connection between the waterside workers and the harbour industries that characterised this precinct during last century. The area and its individual items have a high degree of integrity owing to government ownership and its heritage status. This level of integrity is rare for an urban precinct and an essential part of its cultural value.

The importance of the Millers Point heritage conservation area is reflected in its three heritage-related listings - two under the Heritage Act, 1977 as part of the State Heritage Register, and a third under the Sydney LEP 2012 as the Millers Point Conservation Area. All but five of the sites are also individually listed items on the State Heritage Register and the Sydney LEP 2012.

This study focuses on the legacy of this built form, in light of future development, processes of change and the appropriate means for its management.

Aim of this study

Under the Sydney LEP 2012, the primary controls to manage changes to built form in this precinct are limited to a floor-space ratio (FSR) of 2:1 and Height-of-Building (HOB) of 9.0 metres. Given the importance attributed to the built fabric of this precinct, this study investigates the possible outcomes for built form and urban landscape, in the event that these controls were to be fully exploited.

The study considers 297 sites contained in the Millers Point Planning Proposal area. It assumes that as a heritage conservation area, any proposed changes would need to leave the street facades unaltered. Consequently, the built form studies focus on the rear elevations of the sites concerned.

Changes to individual built form carry significant implications for the collective grain that is readable at an urban scale. Owing to the topography of the precinct and its prominent position on the harbour, the built fabric (and notably, the rear facades) stands out in the urban landscape from many vantage points across the neighbourhood. It is highly visible in the round, from the opposite shores of North Sydney, Balmain and Darling Harbour, and the numerous ferry routes running west from Circular Quay.

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Findings

The study shows that the potential impacts on the individual items and the landscape is broad-ranging. Almost 75 percent of sites in the precinct would be significantly affected, and 70 percent of the street groups in the precinct are visible from across the point and the harbour surrounds. Given the historical value, complexity, integrity and highly visible nature of this urban landscape, relying simply on FSR and HOB controls is insufficient to manage future changes. A more nuanced approach that accounts for individual site form and aspect is required. Considering the existing built form of individual sites, informed by conservation management plans, can better manage the heritage values of the precinct.

The methodology for site selection, assessment of FSR, built form outcomes, and visual impact appear in the following pages. The floor plans and an inventory of floor space capacity appear in the appendices.



Fig. 3: Observatory Hill (top left), Lower Fort Street above and Hickson Road below (at right).



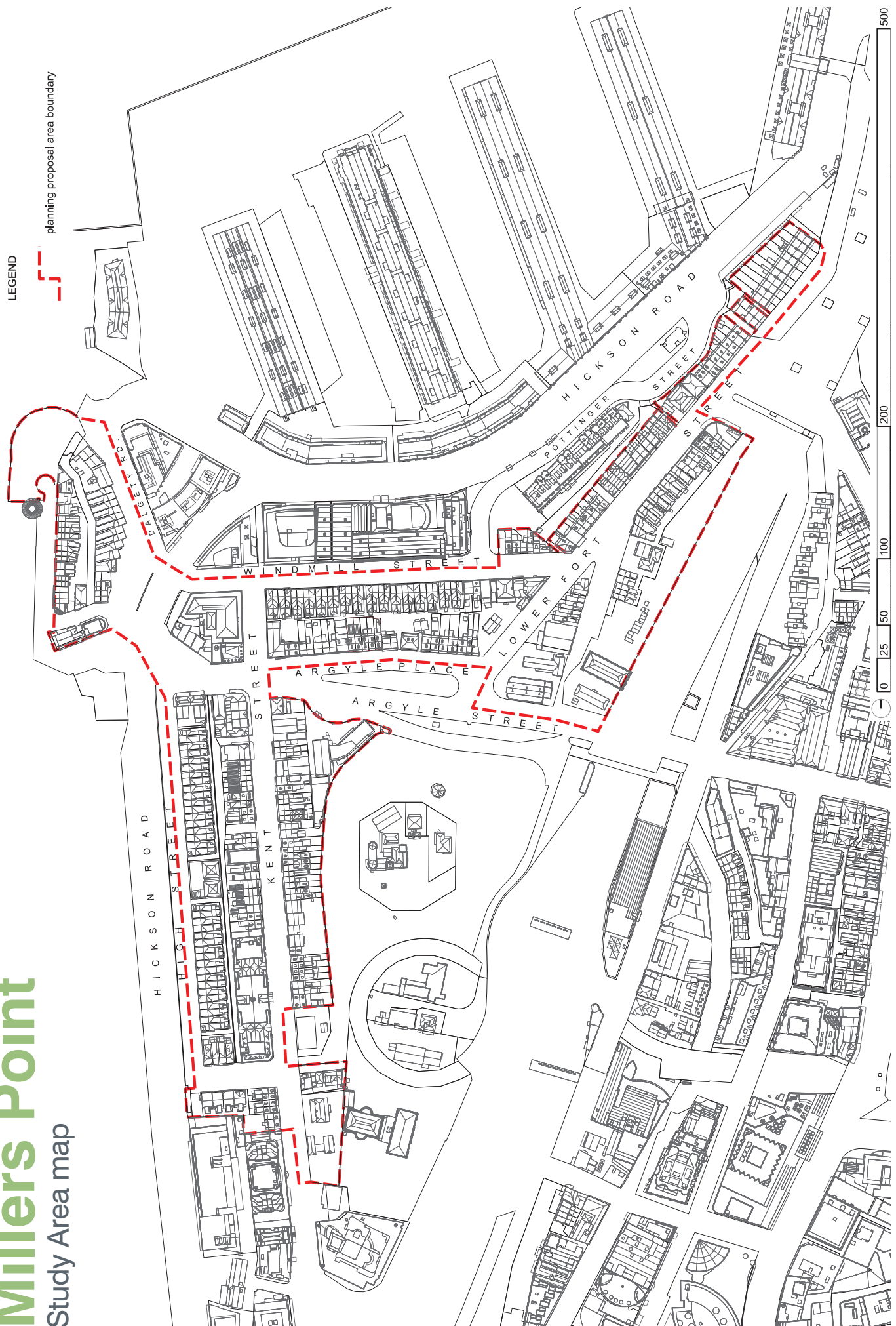
Fig. 4: High Street vertical duplex housing.



Fig. 5: Shop-top housing at corner of Kent Street and Argyle Place.

Millers Point

Study Area map



Built form study

Methodology

Selection of study properties

Of the 297 sites considered in the study, the majority are owned by the NSW Land and Housing Corporation (LAHC), a few by other government bodies, and the remainder (25 sites) are under private ownership.

Key study group - 35 sites

Based on a visual survey of street elevations and aerial observation, a core group of 35 sites was identified as representative of the housing typologies and other buildings that comprise the fabric of Millers Point. In the key map on page seven, these properties are indicated in dark red. The study reference number, (05) refers to the page number of the 35 floor space studies in the appendix of this report.

The floor area of each of these properties was calculated from plan information gathered either from the LAHC or the City's building records. These typically included floor plans published in Endorsed Conservation Management Plans, past Rehabilitation Plans and surveys prepared for the Dept. of Public Works and Services, and past DA applications. Where site area information was not available from these sources, site areas were taken from the City's current cadastre plans.

Expanded study group - 96 sites

The findings of the key study sites were then applied to like terrace houses in each row. Where necessary, adjustments were made to account for variations in site width or area. These sites form an expanded study group of 96 properties across the precinct, shown shaded in light red in the key map.

Data extrapolation study group - 130 sites

From this expanded study group of properties, the likely outcomes for built form were then extrapolated across the remaining sites considered in the study. For some of these sites, assumptions in floor space were drawn from sites in the key study group, adapting calculations according to floor plate size or building footprint. Where this was not possible, a simple calculation of floor space was made based on the product of site coverage and number of storeys, observed by street view or aerial view. These properties are shaded in pink in the key map.

The map on page eight explains how each of the key study sites informed the expanded group of sites and the extrapolated study sites.

Study exclusions

Properties that were excluded from this study are shown shaded in light grey. These comprise privately owned buildings, properties in which the existing FSR is higher than the 2:1 FSR limit, building typologies that differ significantly from the terrace housing type, sites associated with public infrastructure, and sites that have no heritage listing.

The map on page 9 identifies those properties not studied, broken down into four groups:

- 1 gov't-owned properties, current FSR < 2:1
- 2 privately-owned properties, current FSR < 2:1
- 3 gov't-owned properties, current FSR > 2:1
- 4 privately-owned properties, current FSR > 2:1

Some of the excluded sites could be substantially affected by a 2:1 FSR provision, such as Richmond Villa at 116 Kent Street, and the shop-top housing at the corner of Kent and Argyle Streets.

Others already exceed the 2:1 FSR, such as the Oswald Bond Free Store (1-17 Kent Street), at 3.85:1.0. Similarly, the Langham Sydney Hotel stands at 4.13:1.0 FSR and is not heritage listed.



Fig. 6: From right to left, 1-11 Lower Fort Street. Outcomes of floor space studies on nos. 9 and 11 were applied across the remaining terraces in the row.



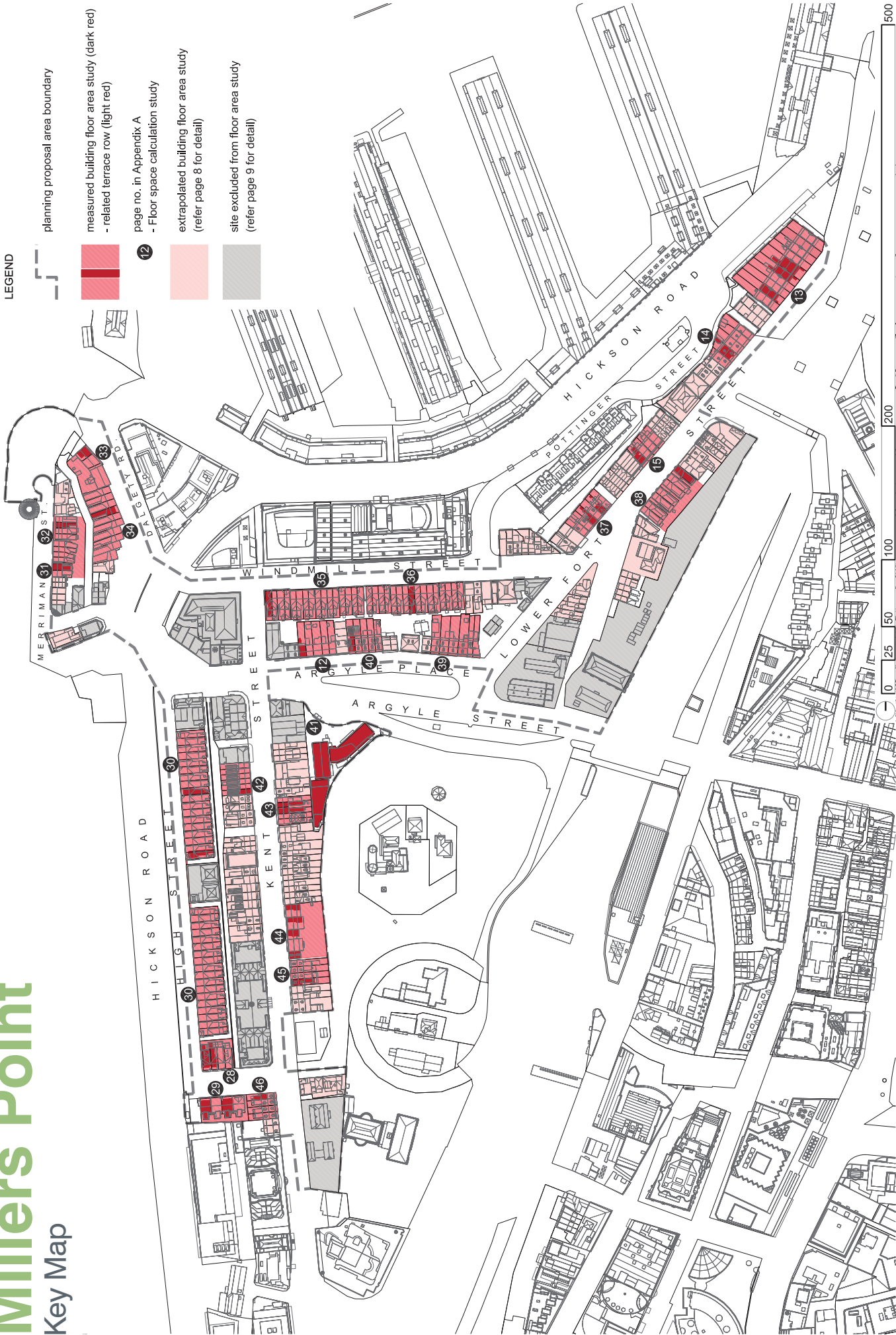
Fig. 7: Richmond Villa



Fig. 8: Langham Sydney Hotel - Kent Street, viewed from Agar Steps.

Millers Point

Key Map



Millers Point

Site data extrapolation map



Study exclusions map

LEGEND

- planning proposal area boundary
- 1 FSR < 2:1 - gov-owned
- 2 FSR < 2:1 - privately-owned
- 3 FSR > 2:1 - gov-owned
- 4 FSR > 2:1 - privately-owned
- non-listed items

Map Labels: MERRIMAN ST., ARGYLE PLACE, KENT STREET, LOWER FORT STREET, POTTINGER STREET, WINDMILL STREET, ARGYLE, HICKSON ROAD, HIGH STREET, D'ARCY STREET.

Scale: 0 125 150 100 200 1500

Built Form outcomes

Assessment and Study Diagrams

Assessment of built form outcomes

The survey of current floor space across the 297 study sites revealed a broad range of outcomes for increases in built form. These varied from negligible additional floor space at two percent of existing, to a very large increase in floor space, at up to 320 percent in some cases. This range of outcomes is grouped across five bands, summarised in the table adjacent.

The Built Form outcomes map on page 11 illustrates how these five bands are spread across the Millers Point precinct. 72 percent of the properties in the precinct were found to be either severely, adversely, or significantly affected. Four percent were moderately affected, while 12 percent were minimally affected. The remaining 12 percent are the sites excluded from the study.

Study diagrams

For bands B, C, D and E, a property from each band was selected for closer study. These properties were selected on the basis of there being an Endorsed Conservation Management Plan in place that informs how future additions to the existing building should be approached.

A three-dimensional built form study was then drawn to clearly illustrate the building mass that would result if the property were added to with the maximum floor space permitted by a 2:1 FSR. This process assumed certain limitations on the built form envelope allowable for any new work: a minimum of 900mm side setback, a maximum building height of 9.0 metres, and minimisation of site coverage. These studies appear on pages 12 to 15 of this report.

Significantly, for three of these four properties, the endorsed CMP recommended that no further additions to the existing built form be made. The remaining property, at 24 Argyle Place, allowed for a single-storey, ground-level addition to the rear, in keeping with the built forms of the adjacent properties in that terrace row.

BAND	ADDITIONAL FLOOR AREA	No. of sites
E	+91-320% current FSR 0.45 - 1.04	44
D	+49-90% current FSR 1.05 - 1.34	137
C	+15-48% current FSR 1.35 - 1.74	32
B	+3-14% current FSR 1.75 - 1.94	11
A	+0-2% current FSR 1.95 - 2.0	37
--	sites not studied	36

Fig. 9: Outcomes of the study on the impact of additional floor space allowable under an FSR of 2:1.

Observations

Three observations arise from this assessment. Almost three-quarters of the sites in Millers Point would be significantly affected by development allowed by a 2:1 floor space ratio.

Secondly, the range of potential change in floor area relative to existing is exceptionally broad - between two and 320 percent. This shows the enormous variation in site size, coverage and existing building form that characterises this precinct, and demonstrates the inappropriateness of a blanket FSR control.

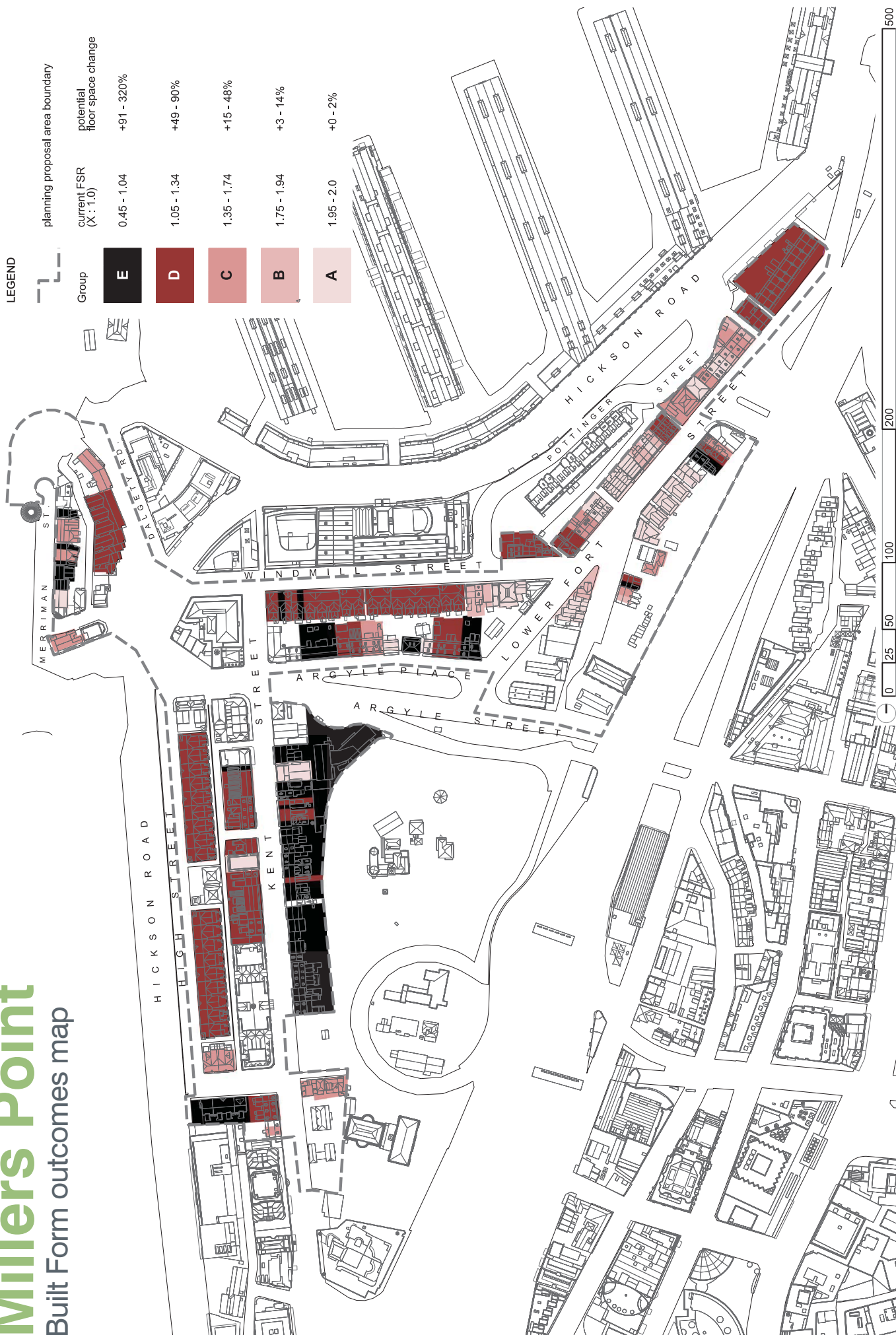
Thirdly, simply relying on FSR and building-height controls in the precinct would be a grossly inadequate means of managing the intricacy, diversity and integrity of the urban landscape of Millers Point. The following study of vantage points and precinct visibility shows the need for a more nuanced approach to this problem.



Fig. 10: Rear facades to Lower Fort Street. Numbers 19-15 are visible at left of image. This row falls into bands B and D of the study.

Millers Point

Built Form outcomes map

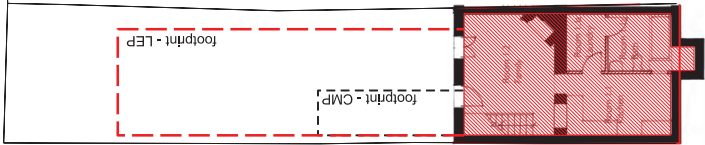


Built Forms outcomes

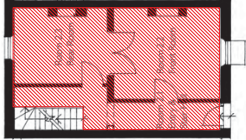
Three-dimensional study



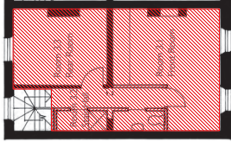
	ACTUAL	LEP2012	CMP	DIFF. - LEP/ACTUAL
Site area	143.48 sq. m.	--	--	--
Total floor area	114.05 sq. m.	286.96 sq. m.	124.65 sq. m.	+172.93 sq. m. (152%)
Floor-Space Ratio	0.79 : 1.0	2.0 : 1.0	0.86 : 1.0	--
Site coverage	40.25 sq. m.	97.75 sq. m.	50.5 sq. m.	+57.5 sq. m. (124%)
Max. height	12.90 m.	9.0 m.	--	--



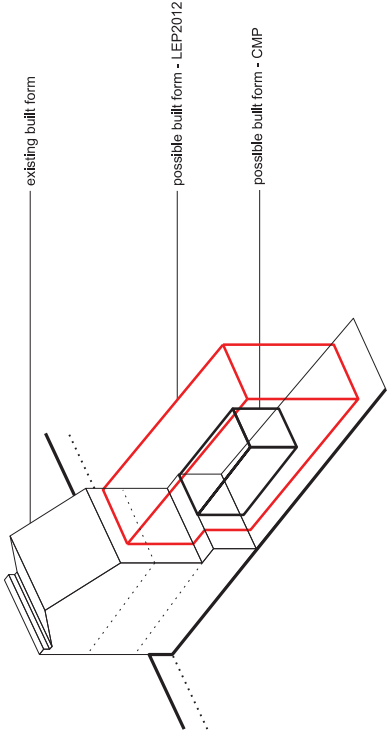
BASEMENT
40.25 sq. m.



GROUND FLOOR
36.90 sq. m.



FIRST FLOOR
36.90 sq. m.



COMPARATIVE BUILDING VOLUMES

24 ARGYLE PLACE

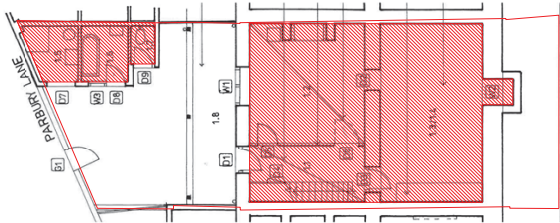
Built Forms outcomes

Three-dimensional study



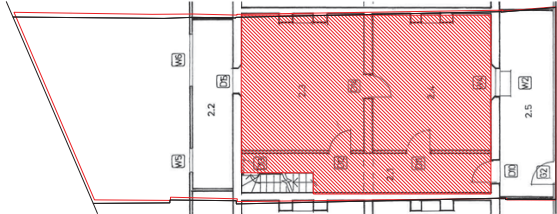
29 LOWER FORT STREET (extrapolated)				
	ACTUAL	LEP2012	CMP	DIFF. - LEP/ACTUAL
Site area	168.55 sq. m.	--	--	--
Total floor area	262.00 sq. m.	337.11 sq. m.	262.00 sq. m.	+75,11 sq. m. (28%)
Floor-Space Ratio	1.55 : 1.0	2.0 : 1.0	1.55 : 1.0	--
Site coverage	77.30 sq. m.	92.20 sq. m.	--	+14.90 sq. m. (19%)
Max. height	~12.70 m.	9.0 m.	--	--

31 LOWER FORT STREET				
Site area	146.50 sq. m.			
Max. allowable area under LEP	294.00 sq. m.			
Max. height of building under LEP	9.0 m.			
Total actual floor area	276.40 sq. m. (1.88 : 1.0)			
Difference	18.00 sq. m.			

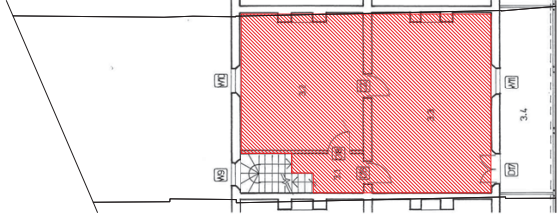


LOWER GROUND
76.90 sq. m.

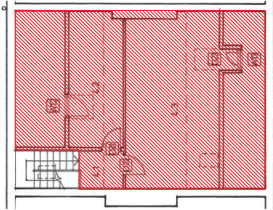
31 LOWER FORT STREET



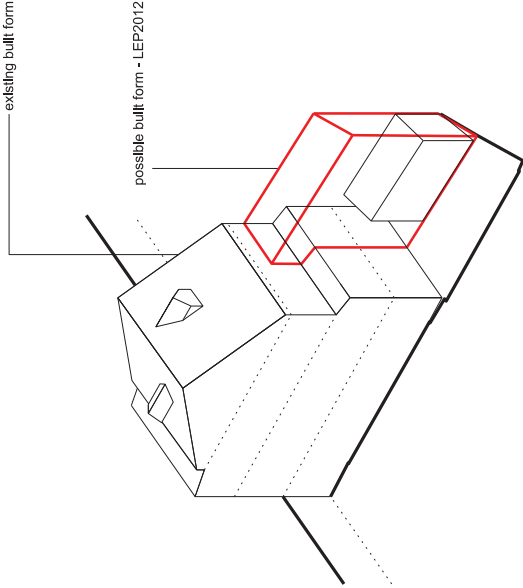
GROUND FLOOR
67.50 sq. m.



FIRST FLOOR
66.00sq. m.



ATTIC
66.00 sq. m.



COMPARATIVE BUILDING VOLUMES
29 Lower Fort Street (floor plan mirror-imaged to 31)

Built Form outcomes

Three-dimensional study

BAND

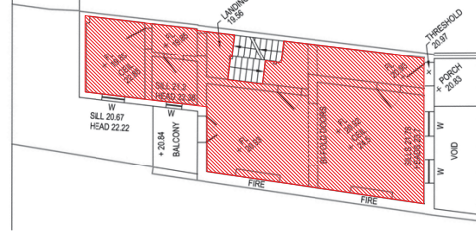


	ACTUAL	LEP2012	CMP	DIFF. - LEP/ACTUAL
Site area	112.80 sq. m.	--	--	--
Total floor area	216.30 sq. m.	225.60 sq. m.	216.30 sq. m.	+9.30 sq. m. (4%)
Floor-Space Ratio	1.92 : 1.0	2.0 : 1.0	--	--
Site coverage	57.10 sq. m.	65.40 sq. m.	--	+8.30 sq. m. (14%)
Max. height	~12.20 m.	9.0 m.	~ 15.90 m.	--

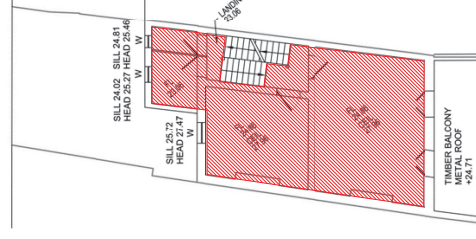


LOWER GROUND
57.10 sq. m.

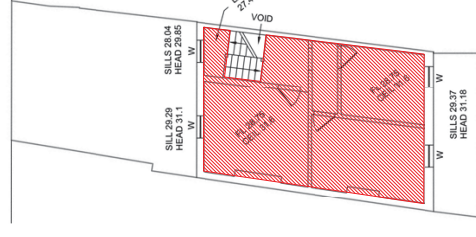
53 LOWER FORT STREET



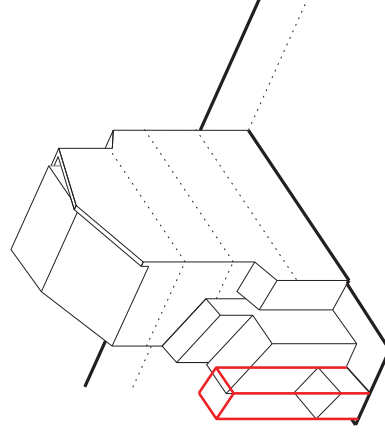
GROUND FLOOR
60.00 sq. m.



FIRST FLOOR
51.20sq. m.



SECOND FLOOR
48.00 sq. m.



COMPARATIVE BUILDING VOLUMES

Visual Impact

Photographic Survey and Assessment

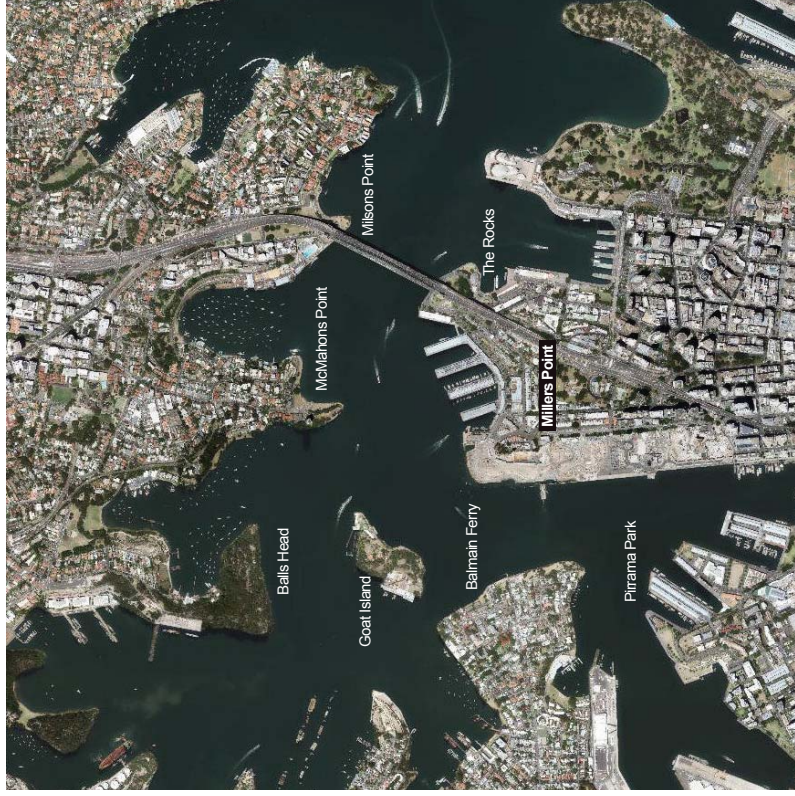


Fig. 11: Millers Point (centre) is clearly visible from public open spaces in the surrounding harbour points.

Visibility of Millers Point and Dawes Point Precinct

Millers Point, along with the Rocks, Dawes Point, Walsh Bay and the Harbour Bridge, comprise a characteristic precinct that is essential to Sydney's iconic harbour landscape. Due to its topography and prominent location, individual features of Millers Point are clearly readable from many points around the harbour - from a series of public open green spaces along the northern shores, and to the west through Balmain and Darling Harbour. There are also four ferry routes running west from Circular Quay that pass close by the point. These offer views of this urban landscape in the round. The complex relationship between land form and built form comes into focus. The map opposite and the following survey of vistas explain in more detail.



Fig. 12: View from Luna Park promenade, Milson's Point.



Fig. 13: Millers Point viewed from Balls Head public bushland reserve.

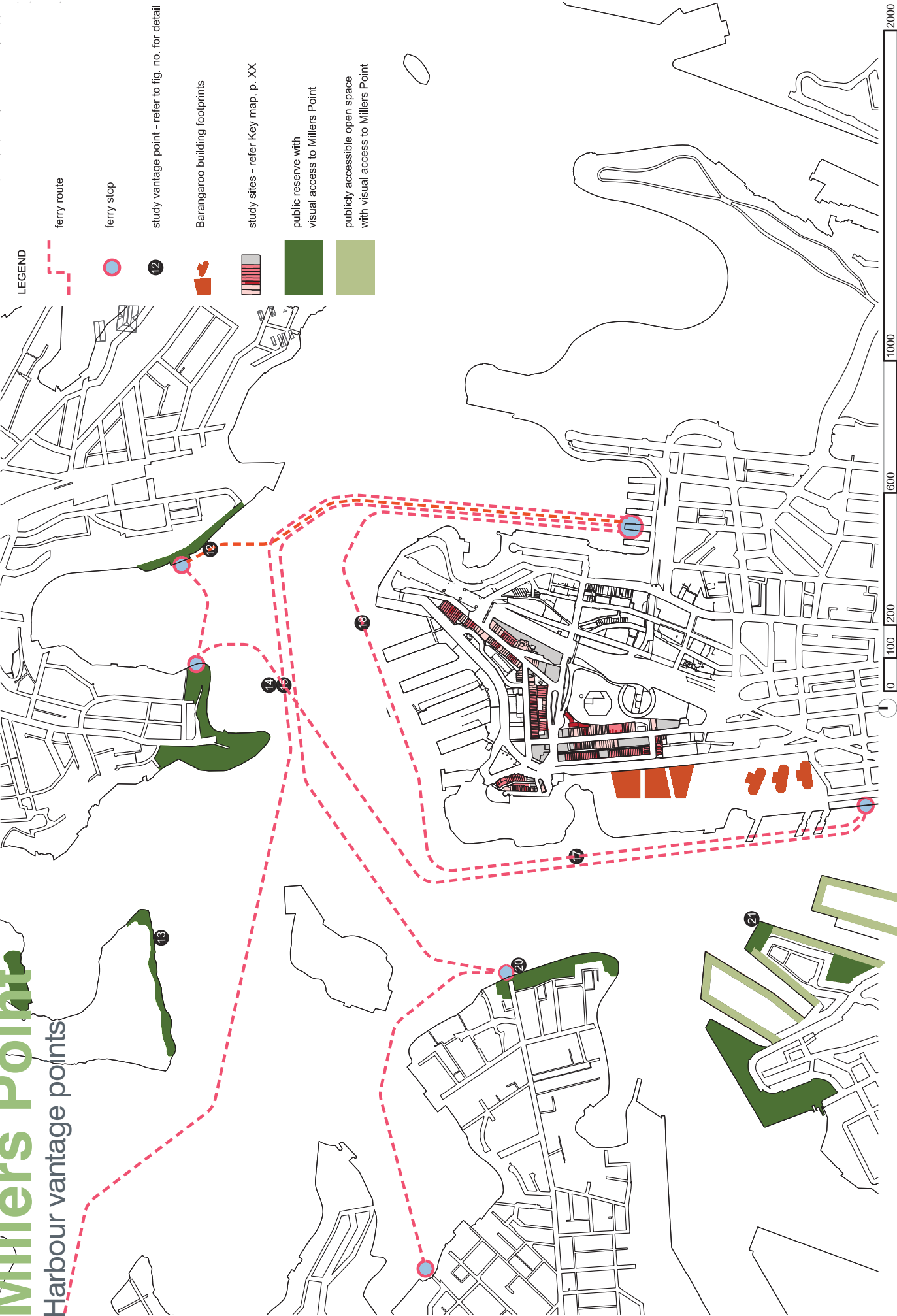
Milsons Point, McMahon's Point and Balls Head

Milsons Point is the site of two significant destinations on Sydney's harbour. Luna Park is a major attraction for Sydneysiders and tourists. North Sydney swimming pool also calls a constant stream of users throughout the year. These sites are bordered by generous harbour-side promenades with clear views across to Walsh Bay and Lower Fort Street behind.

McMahon's Point and Balls Head offer more distant views from the public reserves that run along their shorelines. The rear facades of the houses along Lower Fort Street are clearly readable at this distance, and the continuity of built forms reveal the profile of this ridge line against the backdrop of the Harbour Bridge's southern approach viaduct.

Millers Point

Harbour vantage points



Visual Impact

Photographic Survey and Assessment

Ferry routes around Millers Point

There are four ferry routes running west of Circular Quay that pass by Millers Point with varying proximity. Lines to Milsons Point and McMahon's Point serve the northern shore, and continue on to Darling Harbour. Services for Balmain stop directly west of Millers Point at Darling Street Wharf, and continue on to Cockatoo Island.

The rivercat serves several points along the Parramatta River, terminates at Parramatta Wharf, and stops at Darling Harbour on its return journey to Circular Quay.

The passengers on these services are a mix of local residents, people visiting from metropolitan Sydney and tourists visiting points of interest along the shores of Port Jackson and the Parramatta River.

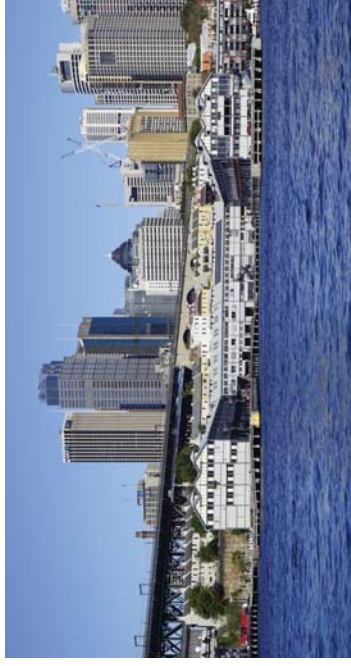


Fig. 14: Walsh Bay Pier complex - Lower Fort Street appears above, directly behind.

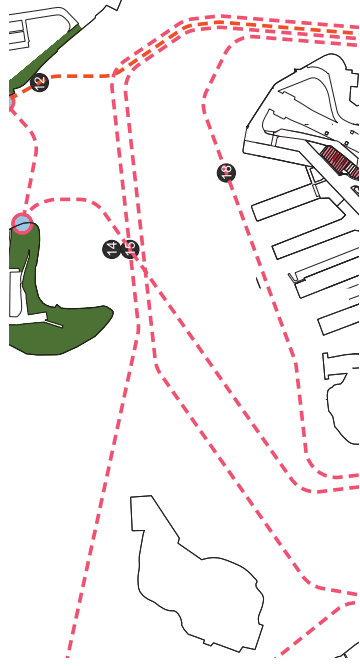


Fig. 16: Vantage points from northern shores and ferry routes.

On the outbound routes of these services, views of all parts of Millers Point in a broader context are possible. Ferries offer a dynamic experience of Millers Point in the round (figs. 14-18). The building lines of Lower Fort Street, Dalgely Road, High Street and Kent Street come into view along these routes.

The inbound routes of all these services ply their way along the southern shore and pass very close to Barangaroo and Walsh Bay. Sections of the point that were seen from afar now become more prominent. The detail and articulation of the house facades that back onto the harbour are clearly readable.



Fig. 15: Dalgely Road clearly readable below Sydney Harbour Control Tower.



Fig. 17: Detail view of High Street with rear of Kent Street behind. Barangaroo Central profile shown dotted in white.

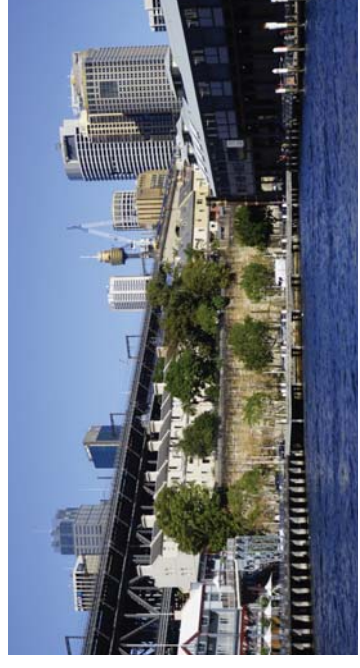


Fig. 18: Detail view, Lower Fort Street rear facades.

Visual Impact

Photographic Survey and Assessment

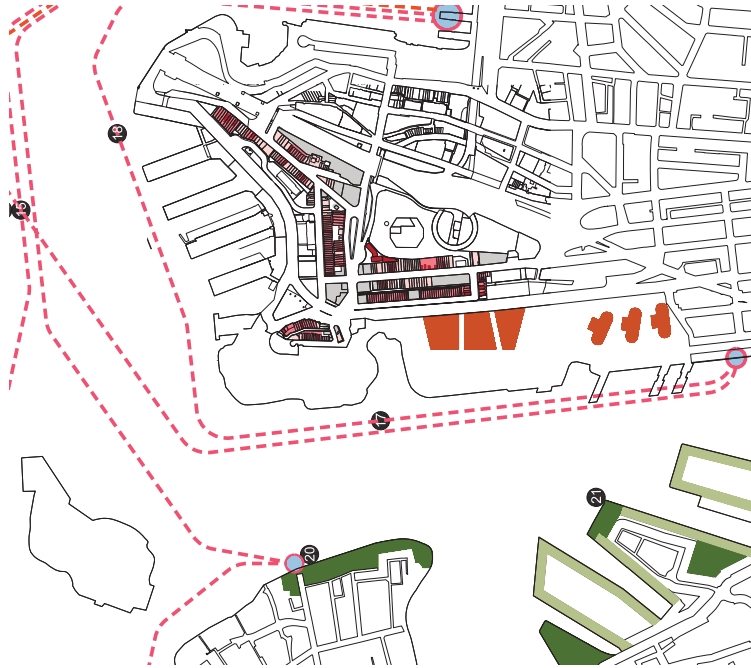


Fig. 19: Vanatage points from Darling Harbour and Jones Bay.

Balmain and Darling Harbour

The western slopes of Millers Point are clearly visible from public reserves along the entrance to Darling Harbour and shorelines of Jones Bay. Illoura Reserve, at the end of Darling Street, is located next to the bus terminus and ferry wharf at East Balmain, looking onto a panorama of Barangaroo and Millers Point (fig. 20).

The proposed Barangaroo Central envelope obscures almost half of High Street, yet the rear elevations of Kent Street north are clearly readable.

Jones Bay offers a series of views of Millers Point. Wharf 10 and Jones Bay Wharf feature long promenades with vistas that terminate at Barangaroo and Millers Point.

There are three public reserves in Jones Bay with similar views - Metcalfe Park, Ballarat Park and Pirrama Park (fig. 21). While Barangaroo Central will obscure two-thirds of High Street, the rear elevations to Kent Street north and the group of shops at the corner of Argyle Street remain visible.

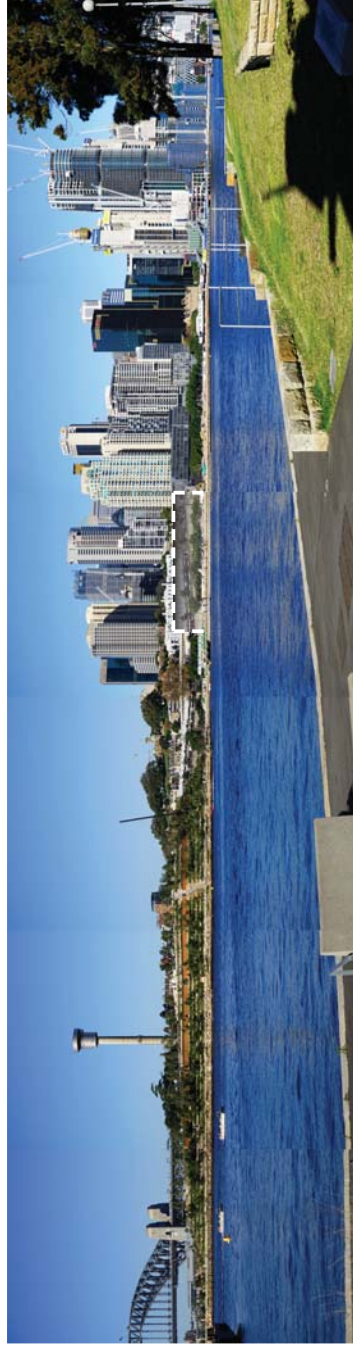


Fig. 20: View from Illoura Reserve, Darling St. Wharf, Balmain. Barangaroo Central profile shown dotted in white.



Fig. 21: View from Ballarat Park, Jones Bay. Barangaroo Central profile shown dotted in white. Rear of Kent Street north and shop-top housing on Argyle Street visible immediately to left.

Visual Impact

Photographic Survey and Assessment

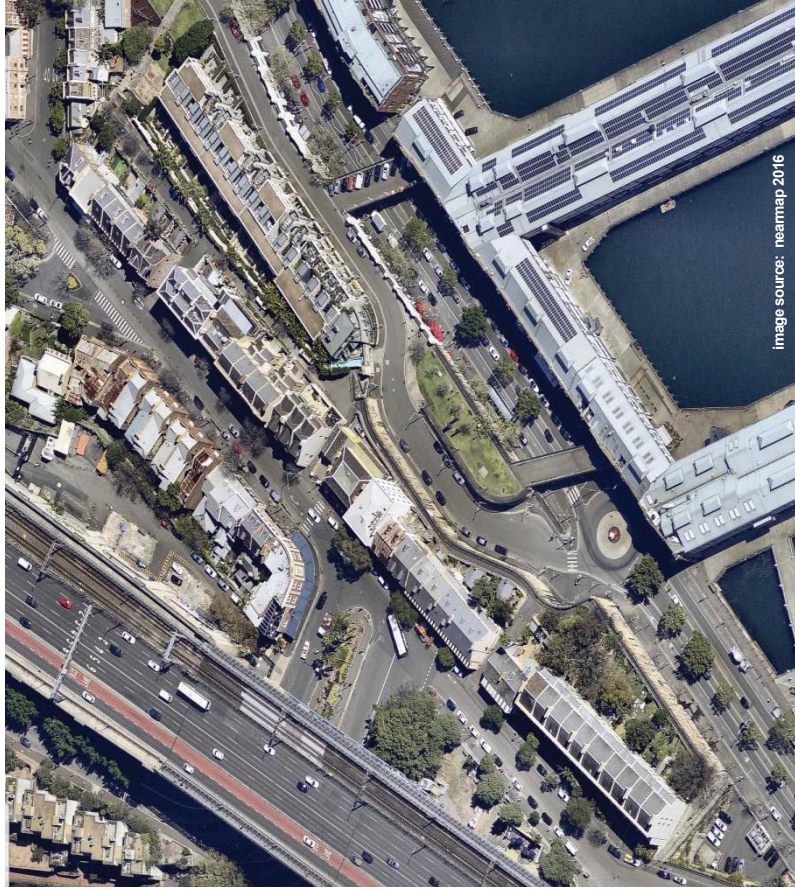


Fig. 22: View looking south onto rear of Lower Fort Street.

Neighbourhood vistas

Millers Point also affords diverse views from many publicly accessible vantage points within the precinct. The complex relationship between built form and topography becomes clearer when observed at close quarters.

Lower Fort Street is significantly elevated above Hickson Road. The rear facades of the houses along its northern side form a prominent backdrop to the urban landscape when viewed from the pedestrian areas of Walsh Bay Pier complex (fig. 22).



Fig. 23: Aerial view onto Kent Street, with High Street at lower edge of the image.



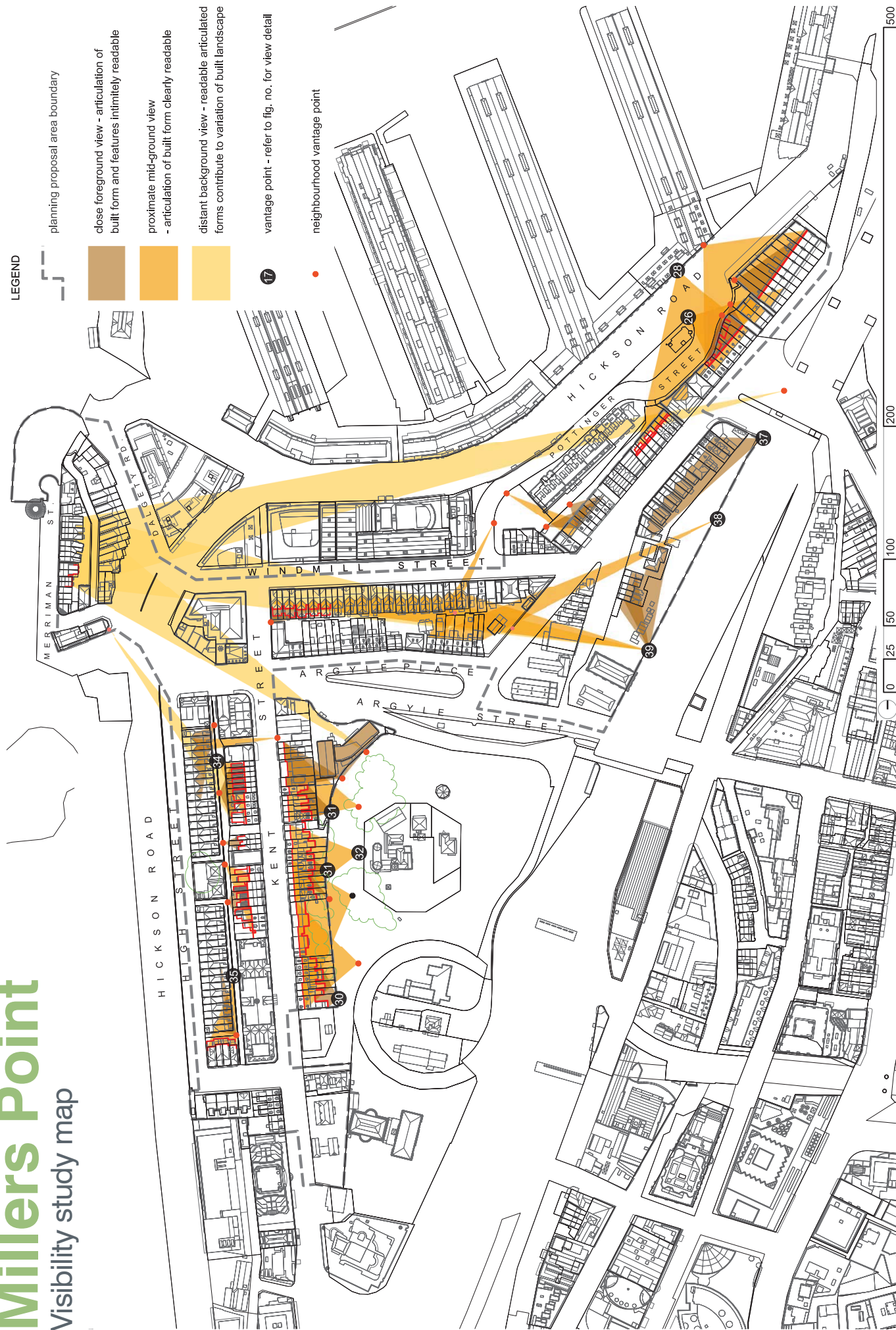
Fig. 24: From Observatory Hill at top of image, the western slope of the point steps down through Kent Street, High Lane, Hickson Road.

Similarly, the public open green space of Observatory Hill is significantly elevated above the houses lining Kent Street. From the upper vantage points close to the observatory buildings, the ridge lines of these houses lie in the foreground, and closer vantage points along the base of the hill offer intimate views over the built forms to the rear of these houses (figs. 23+24).

In addition, there are a number of vantage points from along the Harbour Bridge approaches and Dalgely Road with far-reaching views to the rear facades of almost every street group in the precinct.

Millers Point

Visibility study map



Visual Impact

Photographic Survey and Assessment

Lower Fort Street

The terrace rows along the north-western side of Lower Fort Street form a prominent backdrop to views from Hickson Road and the pedestrian precincts of the Walsh Bay Pier complex. The stepped topography of sandstone cutting and three-storey rear facades articulate an edge to the city. Robust built forms sit along the top of the sandstone cliff and are characterised by their dormers, rear balconies and gable-ended outhouses.

Recalling the possible outcomes for built form illustrated earlier, the majority of these terraces fall into band C and D (page 11). The built form diagrams on pages 13 and 14 indicate the possible development potential that could result from fully exploiting a 2:1 FSR on these sites. The interest of the layered building forms along this cliff-top would be lost.



Fig. 25: Vantage points to Lower Fort Street from above Walsh Bay Pier 2/3.



Fig. 26: Detail view, Lower Fort Street rear facades.

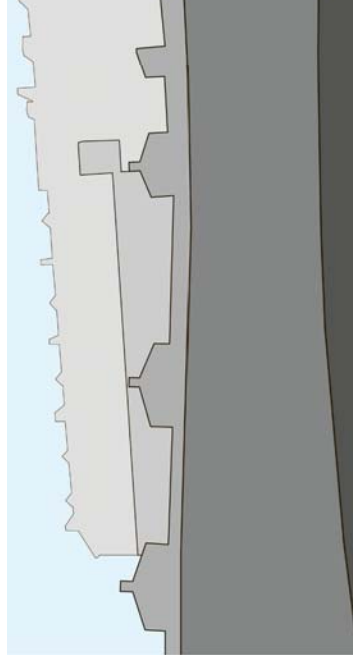


Fig. 27: Layered structure to built landscape.



Fig. 28: Panorama of Lower Fort Street, viewed from Walsh Bay Pier 2/3.

Visual Impact

Photographic Survey and Assessment

Kent Street and High Street

Kent Street runs parallel to the ridge of Observatory Hill and the rear facades of both sides of the street are easily visible from above and below. Bands D and E in the built form study characterise the development potential for these sites, as shown in the diagrams on pages 12 and 13. There is also some visibility onto the rear facades of High Street from High Lane, at either end where the landform rises up. These sites are characterised as band D capacity.

These views are characterised by roof tops and rear wings punctuated by dormers, chimneys, balconies and drying areas, that have a common rhythm and pattern with moments of interest created through difference.

Much of the variation in these built landscapes would be lost should the full 2:1 floor space capacity be taken advantage of.



Fig. 30: Views onto rear facades, Kent Street east.



Fig. 31: Views onto rear facades, Kent Street east.



Fig. 32: Ridge lines to Kent Street, viewed from Observatory Hill.



Fig. 29: Map showing vantage points toward High Lane and Kent Street east.



Fig. 34: Rear facades to Kent Street west, viewed from High Lane.



Fig. 35: Rear facades to High Street, viewed from High Lane.

Visual Impact

Photographic Survey and Assessment



Fig. 36: Long-range vantage points from the Harbour Bridge over Millers Point.

Long-range views across Millers Point

Views from the cycleway and rail corridor along the western side of the Harbour Bridge reinforce that Millers Point is a uniquely public built landscape. The rear of Lower Fort Street east is prominent in the foreground (fig. 37). The northern facades to Argyle Place stand out clearly in the mid-ground, and the repeated roofscapes to the rear of Windmill Street animate this intermediate landscape (fig. 38 and 39). Further to the western edge, the rear facades of the Merriman Street row sit at the base of the Maritime Services Board tower (fig. 39).

Referring back to the built form outcomes study the Lower Fort Street east houses are permitted a minimal new floor space.



Fig. 37: Views onto the rear of Lower Fort Street east, Harbour View Hotel at lower right.

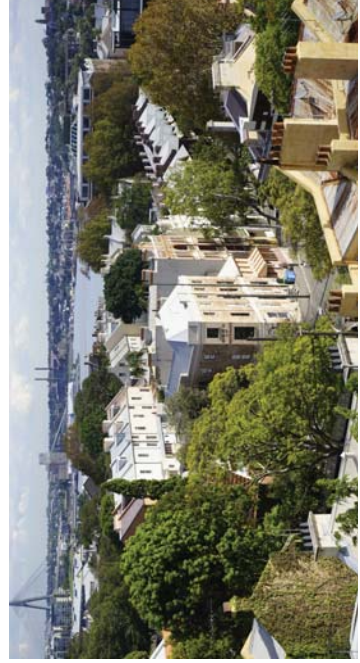


Fig. 38: View across the Hero of Waterloo to the rear of Argyle Place.

However most of the sites along Argyle Place, Windmill Street and Merriman Street fall into bands E, D or C. If development across all these sites were intensified to the full potential illustrated on pages 12 to 14, the fine grain in this urban landscape would be lost.

ATTACHMENT A



Fig. 39: Repetition of form at the rear of Windmill Street is clearly visible at centre-right. The rear of Merriman Street next to the Maritime Control Tower is visible in the distance.

Conclusion

The uniquely important character of Millers Point is reflected in its numerous heritage listings both at state and local government level. It is one of only a few neighbourhoods in the City's LGA that evidence the historically significant relationship between Sydney's topography, its maritime industrial past and its communities. The density and walkable scale of its streets testify to its origins as an industrial-age settlement. It comprises a diverse and highly intact range of building types spanning across key periods in Sydney's history - from the colonial era, through Sydney's industrialisation and its emergence as a modern city. It is arguably the most visible conservation area in the city, with many unique and publicly accessible views over, across, and through the precinct from multiple vantage points.

It is the subject of several heritage listings at State and Local level, and the City's vision seeks to preserve this unique environment as a valuable part of Sydney's living memory of early urbanisation.

This study shows the complex, varied and significantly intact development patterns and their relationship to topography are highly visible and essential to the place's significance.

The current provisions of a 2:1 FSR and 9.0 m. building height control are too simplistic for the complexity of this precinct. They are incapable of responding appropriately to the diverse composition of this neighbourhood, and will not facilitate NSW and local government intentions to conserve the heritage values of this place.

Over 72 percent of the sites considered would be significantly, adversely or severely affected by such a provision. 70 percent of the street groups in this precinct are clearly visible from numerous points around the district and harbour.

Millers Point contributes to the internationally iconic Sydney harbour landscape, and its heritage value and highly visible location call for a more tailored approach to development management that can account for the particular characteristics of each site. The findings of this report present a strong argument for the need to manage change over the long-term by conservation management plans rather than through a blanket application of FSR and building-height controls.



Fig. 26: View of Millers Point from the observation deck of the Maritime Services harbour control tower. The stepped topography of the point is clearly apparent. The rear facades of much of the housing stock are visible from the public domain areas of the lower streets.

ATTACHMENT A