



Mr George Nehme
Acting Coordinator
Development Assessment
Liverpool City Council
33 Moore Street
LIVERPOOL NSW 2170

Dear Mr Nehme,

277 Bigge Street Liverpool (DA507/2018) — Peer Review — Heritage

I refer to my engagement by Liverpool City Council (LCC) to undertake a peer review of the heritage impacts of the above Development Application (DA) and the adequacy of the associated heritage documentation.

In relation to the heritage impacts of the proposed development, the brief noted two aspects: the mitigation measures of the proposed new tower and the adaptive reuse of the retained heritage building on site, the Commercial Hotel.

In relation to the heritage documentation, I have referred to:

- Conservation Management Plan (CMP): The New Commercial 277 Bigge St Liverpool by Heritage 21 September 2018 (Issue 5, 25.09.18);
- Statement of Heritage Impact (SOHI): Proposed Development at 277 Bigge Street Liverpool by Heritage 21, September 2018 (Issue 3, 25.09.18);
- Fabric Analysis and Conservation Action: The New Commercial, 277 Bigge Street Liverpool by Heritage 21, November 2017 (Issue 2, 29.06.17) (there appears to be a mistake in these dates);
- Estimated Costs of Works Schedule The New Commercial, 277 Bigge Street Liverpool by Heritage 21, November 2017 (Issue 2, 28.06.18); and
- Costed Long Term Maintenance Plan: The New Commercial, 277 Bigge Street Liverpool by Heritage 21, November 2017 (No issue reference, but watermarked Draft for Client Perusal).

In relation to the other DA documents I have referred to:

- Architectural Drawing Set: Liverpool Tower, 9-23 Scott Street and 275-277 Bigge Street Liverpool dated 26 September 2018 (Issue Development Application); and
- Design Report 9-19 Scott Street and 275-277 Bigge Street by Fender

The DA documents are by the project architects are Fender Kastalidis, Victoria and the heritage documents by Heritage 21, Rappoport Pty Ltd, Sydney.

In responding to the heritage documentation provided, I have addressed what usual heritage

practice would expect in relation to contents and methodology and the actual adequacy of the analysis and assessment provided.

This peer review has been prepared on the basis that LCC required a frank professional heritage assessment of the proposal and the supporting documents. LCC have found that the methodology used in this peer review to be both professional and appropriate.

Review of Heritage Documentation

1.0 General Comments

1.1 The CMP and the HIS both include the heritage methodology that would be expected to be included in relation to current heritage practice, although I note the CMP excludes reference to movable heritage and does not identify spaces not accessed which, in my opinion, are omissions. Reference is also made to the appropriate guidelines such as the Australia ICOMOS Burra Charter and those by OEH NSW.

1.2 The key issue that I have with the overall scope of heritage documents is that the SOHI, while titled to address the whole development site, does not address the impacts of the development on the development site as a whole and on heritage items in the vicinity of the development site, apart from the Commercial Hotel site and to some extent the Bigge Park Heritage Conservation Area (HCA).

1.3 Also, although the archaeological assessment that is included as Appendix A in the CMP includes a good assessment of archaeological potential on the Commercial Hotel site (and includes a site analysis missing in the CMP itself), an assessment of the archaeological potential of the development site as a whole should have been required in the SOHI. Similarly, the SOHI is silent about any structures on the development site (apart from stating that they are not heritage items) and on impacts on the three heritage items across the road to the south of the development site, including overshadowing by the tower — see 3.3 below.

2.0 Conservation Management Plan

2.1 The CMP states that the history is based on secondary material with no primary research undertaken. While there is nothing to say that primary sources must be looked at, such primary research may well have assisted in a more accurate dating and description of components, such as the Northern and Western wings and the Stables. In the CMP, adverse assessments of significance have been made against these elements with little hard supporting data.

2.2 There is a disconnect between the history and physical analysis and a relative lack of analysis of what the fabric itself reveals about the history and use of the building. (This is distinct from the condition and significance on the tables in the Fabric Analysis report). An example is that the brick bonding of the Northern Wing shows it to be different to the main building (and the Western Wing for that matter) but the same as the Stables.

2.3 The CMP has a limited use of cross referencing generally and little referencing of documentary evidence when describing or analysing the fabric or its evolution. There are also occasional 'copy and paste' glitch in the CMP, such as recommending 'members of the

congregation' be asked to assist in social values assessment of the hotel.

2.4 While it is reasonable that CMPs are prepared in relation to real world issues and proposals, they are generally meant to proceed and inform the development of actual proposals. At times the CMP puts this concept into question by using drawings from the proposed DA scheme, as is the case in the discussion of curtilage in Section 3.3.1 (p78) and Figure 105, a recommended open space cross section of new work in relation to the heritage item, with a section showing a tower that appears to be very similar, if not identical, to that proposed in the DA.

2.5 Assessment of the Stables: The documentary and physical analysis and the significance assessment of the Stables building (variously: Little external and Intrusive internal significance) is very poor. My inspection indicated that its gable form, barn style upper door, the same face brickwork and bonding as the northern wing face brick construction, combined with rarity as a pre-motor vehicle horse stables structure, is indicative of at least a Moderate level of significance (see Figure 1 Attachment 1). (The NBRIS CMP 2017 has this as Moderate Significance.) After that assessment the Stables are hardly mentioned in the CMP and SOHI – sometimes being referred to as Stores or Storage. This is compounded by the fact the Site Demolition plan in the DA set (DA020) has, in my opinion, incorrectly interpreted the Survey Drawing (DA015) and does not show the former Stables building at all.

2.6 Analysis of the Northern Wing: The main three level structure has Colonial bonded brickwork (headers every fourth course), whereas the Northern Wing is a version of Flemish Bond (headers in each course but at every fourth brick, whereas true Flemish is every alternate brick). Nevertheless, stylistic elements such as timber joinery are very typically late Victorian that indicate a very early addition. More particularly, the history in the CMP states the hotel was drawn up by Varney Parkes in 1885 and constructed in 1888. The SHI form dates the first image of the hotel to 1888 (Land sale brochure) whereas the same figure in the CMP (Figure 20) says 1889. Either way, the documents show it to be within a year of construction of the main hotel. In my opinion it is possible that it was constructed as part of a staged original construction as a result of staged land purchases. My suggestion is that Lot 18 may have been purchased by Annie Marsden when she had obtained a mortgage and the northern addition and the stables added — they have the same brickwork and bonding. There is also a solid 'party wall' end to the Bigge Street verandah that is part of the hotel, not the addition, suggesting it was conceptualised as potentially allowing another separately owned property adjoining it.

2.7 Assessment and Policy on Relative Significance: In the OEH Significance Assessment Guidelines 'Exceptional' is noted as a rare or outstanding element directly contribution to an item's significance – this relates to the item itself and not against other places or State or local listing. I would argue that the evocative overall late Victorian form of the hotel with the use of unusual and large dormers on the third level is an Exceptional component of significance.

2.8 While the architectural resolution of the Northern Wing addition is perhaps less interesting than the original, it has suffered no more or less to the whole externally. It is a very early addition and likely to be part of the staged construction of original phase of the hotel and

could therefore be seen as High significance, as noted in the NBRIS CMP in 2017.

2.9 While Moderate can be argued as the level of significance of the Northern Wing in relation to the contribution of different components, I do not agree with the policy identified in the CMP. Table 7 in the CMP in relation to significance states that Moderate components 'have historic and aesthetic value that contribute to the overall significance'. In heritage practice generally, policy in relation to Moderate would usually allow significant adaptation but require overall conservation unless there are compelling and unavoidable reasons not to – such a Policy is in the NBRIS CMP 2017. In this case, in policy development a constraint identified is that the owner wishes to demolish this wing. Conservation Policy 20 on Moderate significance elements then includes 'Demolition of such spaces or elements for logistical reasons would be generally permissible to allow the site to continue in its historic use'. I am not convinced that a compelling argument is provided for its removal in the CMP and as below the evaluation of the SOHI lacks of an identification of an adverse heritage impact from this removal.

2.10 Significance of the Western Wing: Based on my inspection showing that the Western Wing end wall having the same Colonial bonding as the main section (and different to the northern wing) I believe that the Western wing is most likely to be an original section and should have been assessed as of High significance.

2.11 Significance of the First and Second Floors: I agree with assessments in the CMP that the interiors of the first and second floor are of High significance, except for recent adaptations to create bathrooms. I also note assessment in the Fabric Analysis – generally High significance, including for the joinery and lathe and plaster ceilings.

Unfortunately, as discussed below, these aspects of High significance are not carried through to the SOHI in relation to the proposed removal of most internal walls and loss of spatial definition – In my opinion this is a significant omission in the SOHI assessment.

2.12 Curtilage Assessment: I do not agree with the curtilage assessment in the CMP. Curtilage is the area of land directly associated with significance and does not necessarily equate to open space. The assessment in my opinion incorrectly takes as a starting point that open space around an item is better *per se*.

3.0 Statement of Heritage Impact

3.1 While the SOHI introduction suggests that it has addressed impacts from the development site on all heritage items in the vicinity of the site it has only addressed the Commercial Hotel (eg on the table in relation to LEP clauses) and to a small extent the Bigge Park HCA, but not other individual items in the vicinity of the site. Nor has it addressed the archaeological potential on the full development site.

3.2 One of the missing considerations in the SOHI is in relation to impacts on the three hotel related items across Scott Street. It could have been argued, for example, that there would also be some positive aspects from a retained 'precinct' of hotels and that the tower will lead to a better 'activation' of these items.

3.3 However, there will also be adverse impacts on these and other items in the vicinity. It

appears that the proposal will result in overshadowing that may impact the heritage items in the vicinity. The June 21 shadows cover the Golden Fleece and the former Golden Fleece outbuilding (I103, and I102) across the road from early morning to late afternoon and will possibly have impacts on any external spaces and the frontages to those buildings. 16 Scott Street (I101) will be overshadowed from noon until after 3pm. The 3pm shadows on 21 June will extend to Light Horse Park across the railway line.

3.4 Nowhere in the SOHI is there an objective description of heritage impacts after which a more subjective evaluation is applied. I believe that is important mechanism to assist the consent agency understand both the actual impacts and a project rationale for these where they occur. Here the project team's rationale is very much front and centre to the analysis provided in relation to the LEP and DCP clauses and the OEH SOHI questions. I suggest that part of the problem is the OEH SOHI guidelines that cast the SOHI process as a series of questions that encourage a subjective rather than objective response – which is the case here.

3.5 Section 6.2.3 of the SOHI addresses CMP policy compliance. In relation to CMP Policy 20 on relative significance (p75) it states that 'considerable care has been taken to ensure that limited to no alterations are made to items of high significance' with no reference to the removal of the early or possibly original northern wing because it is of Moderate significance. This creates a significance threshold for impacts that is not referred to in the CMP and just appears in the HIS. Against OEH guidelines on demolition the SOHI states that 'The demolition of the northern wing ensures the success of the public accessibility of the proposed development'. However, it does not acknowledge any heritage impact and that is a significant omission. I do not agree with the statement that follows: 'the northern wing has undergone extensive alterations and limited heritage fabric has been retained' as much of its external form and much fabric is intact, including the three upper windows facing Bigge Steet.

4.0 Other Heritage Documents

I have reviewed the Fabric Analysis, Costed Works Schedule and the Costed Long Term Maintenance Plan.

4.1 The Fabric Analysis is a table-based approach of condition and significance of elements of each space and external elevations. To complement the CMP assessment of the upper two levels of the hotel being High Significance, it includes ceiling and timber joinery as of high significance.

4.2 The Costed Works Schedule is a table-based document with an emphasis on budget estimates for repairs, but with little detailed information of extent and approach. I support the LCC comments provided to me that this report requires more details. My review suggests that the costed works schedule should be revised prior to any determination to include an overall written approach and scope to the demolition, conservation and adaptive reuse works for the building to accompany the table in the document. Further details can be also be required as a condition of consent if considered necessary by the consent authority.

4.3 The Costed Long-Term Maintenance Plan and the estimated costs appear reasonable. I would suggest that a mechanism be identified via a condition of consent that such expenditure

actually happens and can be documented.

5.0 Other Project Documents

I have referred to the Architectural Plans set and the Design Report in preparing this advice.

5.1 Drawing DA020 in the Architectural Plans, a site demolition plan appears to have incorrectly interpreted the Survey Drawing DA015 and does not show the existing Stables building that is proposed for demolition. This should be corrected before any consent is provided.

5.2 I do not agree with the text messages associated with the series of sequenced drawings on pages 16 & 17 in the Design Report under the heading of Heritage that start with the assertion of 'removal of non-original wings' justifies the new two level 'Stables'. As below, I do not accept the idea of the negative podium that is put forward.

5.3 The Design Report includes shadow diagrams on p124 that show the three heritage items across Scott Street will be overshadowed for a good part of the day in mid-winter and that in the late afternoon so will part of Light Horse Park.

Review of the Impacts of the Proposed Development

6.0 Impacts from Proposed Tower

6.1 As an overall urban form, the tower appears to be a reasonably handsome design response with a softened shape and use of brown grey colourings and differentiation at different levels, including the lower eight or so levels having blades to provide a patterning that relates to an adjoining recent office tower. The tower will be located at the edge of the Hoddle Grid and in a way will help define the edge of the grid.

6.2 However, I do not think that the tower responds as well at the lower pedestrian and streetscape levels. I do not accept the 'podium' idea put forward — it's a 'negative' podium that while setting the foyer spaces back from the tower front and from the hotel, does not create a positive form on the streetscape the way the current buildings along Scott Street do and it emphasises the tower foyer space and its open forecourt. The idea of public plaza in the CMP and SOHI is presented as benefiting an increased 'curtilage' both spatially and visually for the hotel, but to me it reads as a typical ground plane forecourt to a tower lobby. As above, in assessment, I do not agree with the analysis that the setting of the hotel will be benefitted by demolishing all around and some of the hotel itself. The hotel may have been a 'public house', however, it had adjoining buildings and a built-up setting and was not a free-standing public building such as you would expect with, say, a court house.

6.3 As noted elsewhere, I believe the tower will have overshadowing impacts on heritage items in the vicinity of the site and this should have been identified in the Heritage Impact Statement. No assessment has been made of potential archaeological impacts on the site as a whole, only on the hotel site.

6.4 While not heritage items, some of the structures proposed for removal are good representative Art Deco Inter-War shopfronts and I believe that the existing streetscape and these structures should be photographically archivally recorded prior to demolition, as a

condition of consent.

6.5 As discussed above (2.11 re the CMP and 5.2 re the Design Report) I question the rationale provided for the 'new civic space' around the heritage item. In my opinion, such an approach in other parts of Sydney such as North Sydney, has created heritage buildings as isolated 'jewels' set in a sea of plazas and towers, without any retained real setting or context. The Liverpool city centre is generally low scale and is framed within the important Hoddle Grid historic street plan. In the light of LCC support for future tower development in the City, LCC should also identify a desired future streetscape character of the Liverpool city centre to retain the consistency and legibility of its historic Hoddle Grid urban form and streetscape scale appropriate at a pedestrian level.

7.0 Impacts from Adaptive Reuse of the Commercial Hotel Site

7.1 Demolition of the Stables: As noted above, the CMP incorrectly assesses the Stables and this is carried into the SOHI with no reference to what will be an adverse impact from its removal.

7.2 Demolition of Northern Wing: As noted in 2.6 above, my concern is that the significance assessment of this very early element is based on limited information and as noted in 3.5 no reasonable justification has been put forward in the SOHI for the removal of this wing, let alone an identification of heritage impacts. The removal of the Northern Wing will result in an adverse impact on the Bigge Street streetscape within the Bigge Park Conservation Area and will leave the hotel greatly diminished in size and truncated in form.

7.3 Loss of spaces and fabric on the 1st and 2nd floors: The proposed demolition of most of the bedroom walls and spaces to create open plan offices on the upper levels of the hotel is not supported. The spaces are generally of High significance in the CMP and contain a fair degree of High significance fabric (see Fabric Analysis report). This would remove a key element noted in the SHI listing under Criteria G as evidence of a residential hotel: 'the site is representative of a late-Victorian residential hotel'. The residential use of the hotel would have been historically important given its location near a major railway station.

Discussion of Options to Mitigate Heritage Impacts

This section describes my recommendations for changes to the external site and the interior of the Commercial Hotel to mitigate the impacts identified above. Three options are addressed for the site below and shown on Attachment 2. A single suggestion is provided for the interior on the First and Second floors — see Attachment 3.

8.1 Site Option 1: Retain Stable and Northern Wing

I believe the proposed scheme should have considered the retention and adaptive reuse of the Stables (see Attachment 2). I accept that their retention would require a redesign of the tower scheme as currently there is a basement area under the Stables site. If the Stables were retained this would create a far more interesting, intimate and authentic urban space than what is proposed.

8.2 Site Option 2: Remove Stable but retain Northern Wing

While this would see the removal of the Stables, it is recognised that the DA development has progressed over some time without consideration of the retention of the Stable and its retention now would impact the scheme as evolved. Given that, this option is also reasonable as it will retain the early form of the Hotel and its streetscape presence and contribution.

8.3 Site Option 3: Remove Stable and Northern Wing but add verandah to north.

I am of the opinion that the proposed demolition of the Northern Wing will have overall impacts on the form and setting of the hotel. There is already a lot of loss proposed around the hotel. As shown on drawing DA160, with the removal of the northern wing, the Bigge Street elevation of the hotel would look very truncated and the overall building elevation will be left small and insignificant in the important Bigge Street streetscape. The generated view on p18 of the Design report in my opinion shows how truncated the Bigge Street elevation will be and how cut off the northern elevation of the hotel will read as.

I believe that rather than a modern fabric awning attached to the ground level on the northern elevation that if the Northern wing is removed that a two-level verandah should be added on the north elevation to provide a stronger three-dimensional form and streetscape presence and to complement the verandah at the south end. This would mitigate to some extent the impact of the removal of the Northern Wing and avoid the diminishing and truncated frontage to Bigge Street that the proposal provides. While the existing first floor space (FF16) that connects the stair case to the upper level of the northern wing provides a starting model for how a verandah could be added to this elevation (see Attachment 1, Figure 4), I recommend that the wrap around verandah be at the same height as the existing to Bigge Street verandah to provide a more consistent and coherent verandah form.

In preparing the site options I concluded that the proposed New Stable is located too close to the Hotel at its eastern end and should be required as a condition of consent to be 1.2 narrower — this is shown indicatively on Option 3.

8.4 Internal changes to the First and Second Floors

While the proposed changes to the Ground floor appear reasonable, those for the First and Second floors are not reasonable given the extent of removal of significant fabric and spaces and their assessed level of significance and as important evidence of the residential use of the hotel.

It is agreed that residential accommodation in the hotel is not likely to be a viable future use. However, I do not accept that as a retained item on a large commercial tower site that it needs to be gutted on upper levels for an open span use — a more innovative design approach is needed. In this situation the retention of significant spaces and fabric should determine the nature of the new commercial use — not a new commercial ‘norm’ of open space being the determinant. The assumption of large open work spaces is questioned over the opportunity to provide a range of spaces that can be used by sole traders with some shared spaces. A more creative response would be to retain the circulation corridor spaces (including the arches and

walls adjoining the staircases and halls) while removing a few internal walls (including recent bathroom insertions) while retaining nibs of the removed walls. Attachment 4 is a sketch plan I have prepared. The First floor could have three of the larger bedroom spaces retained and three of the Scott Street frontage rooms linked as a space together and with the retained central and east west hall. On the Second floor seven bedrooms can be retained together with both the central and the east-west hall. On both levels the proposed lift and a DDA toilet are provided.

8.5 Ideal and Minimum Heritage Mitigation from above

The ideal heritage outcome would be Option 1, together with the internal changes to the first and second floors noted in 8.4.

The minimum acceptable heritage outcome (and combined with an acknowledgement by the consent agencies of the heritage impacts of the proposal) would be the addition of a wrap around two level verandah noted in 8.3, together the retention of spaces and fabric to the first and second floors outlined in 8.4.

Findings

9.1 Overall, the heritage documents reviewed for this DA follow a reasonable methodological approach in regard to normal heritage practice, however, shortcomings are identified in the CMP, the SOHI and the Works Schedule in the following aspects:

- The CMP lacks a good analysis linking documentary and physical evidence that results in questionable assessments of significance in relation to the Stables Building and the Northern Wing. This is reflected in a lack of references and primary research;
- The SOHI lacks an objective identification of impacts as well as a subjective evaluation. The SOHI also lacks a reasonable assessment of heritage impacts in the vicinity of the development site including from overshadowing for the proposed tower. The SOHI also lacks an assessment of the archaeological potential of the development site as a whole; and
- The Costed Schedule of Works lacks sufficient detail on the extent and approach to the required conservation works, as advised by LCC and noted in the SOHI.

9.2 In my opinion, the tower design is reasonable at a broader urban scale, however, I question the concept of a 'negative' podium and the 'new civic space' created by the removal of all outbuildings to the hotel, including the Stable and the Northern Wing, on the basis that this will improve the 'curtilage' of the hotel.

9.3 As noted in paragraph 6.5, LCC should address in urban design terms streetscape guidelines for future tower development in Liverpool city centre generally that is currently comprised of low scale streetscapes that act to reinforce the important Hoddle Grid historic street plan.

9.4 My review suggests that the description, analysis and significance assessment of the former Stables building is poor. It is at least of Moderate significance (as identified in the NBRSP CMP 2017) and should have seriously been considered for retention as a real alternative to the ironically named 'New Stables'. If ultimately consented for demolition then, as a minimum, LCC

and the ultimate consent authority should acknowledge in their determination the heritage impacts that will result from its removal.

9.5 The analysis of the Northern wing upon which the assessment of Moderate significance is based is poor. This assessment is then used with a 'low bar' policy on elements of Moderate significance, together with the project client's desire to remove this element to provide open space to support removal without even then identifying heritage impacts. In my opinion, its removal will have adverse impacts on the building and its form and important corner streetscape presence on the Bigge Street. In my opinion the proposal will leave the building greatly reduced in form and stature and requires an addition to mitigate the impact of its removal. As a minimum mitigative option I have suggested a two-level verandah be added on the north elevation picking up on the form of the current link space FF16, however, with the upper level roof at the same height as the existing Bigge Street verandah roof. As above in 9.4, LCC and the ultimate consent authority should acknowledge in their advice and determination the heritage impacts that will result from the removal of the Northern Wing.

9.6 The proposed demolition of most of the circulation halls, bedroom walls and spaces and associated fabric on the upper two levels of the hotel that is identified as High significance in the CMP to create largely open plan offices is not justified in relation to policy in the CMP and the Fabric analysis and the SHI listing that notes the importance of its residential history. As per 8.4, I have prepared indicated sketches as Attachment 4 to show how more spaces and fabric can be retained while providing for a new use.

9.7 In my opinion, taken together, the removal the Northern wing, the Stables and much of interior to first and second floors will have an unacceptable heritage impact on the Commercial Hotel as a heritage item and also on the Bigge Park HCA such that the current DA should not be approved in its current form.

Recommendations

The following recommendations that are based on the above findings are grouped according to agency action and timing in relation to any consent.

10.1 Acknowledgement of Heritage Impacts by the Consent Agencies

In terms of expediting the DA process that has already involved many inputs and iterations, it is recommended that rather than requiring further changes to the DA documentation (apart from 10.2 below) that LCC and the Sydney West Planning Panel as the ultimate consent agency acknowledge the shortcomings identified in this report and the heritage impacts identified here that are not fully identified in the project SOHI, namely:

- Limited impact assessment on heritage items in the vicinity of the site;
- Poor analysis of the Stable Building and a flow on from this in significance and impact assessments;
- The proposed removal without appropriate impact identification of spaces and fabric of High significance of on First and Second floors of the Commercial Hotel; and
- Policy for Moderate elements (such as the Northern Wing) should have required retention unless there is no prudent alternative and, in any case, the proposed removal of the

Northern Wing should have identified an adverse heritage impact.

10.2 Amendment to Proposal Prior to Consent

As per 5.1 above, the site demolition drawing DA020 should be amended to show the correct outline of the Stables building proposed for demolition (but only after considering site options as above).

As per 4.2, the Costed Works Schedule should be revised prior to determination to include an overall written approach and scope to the demolition, conservation and adaptive reuse works for the building to accompany the table in the document.

10.3 Conditions of Consent Prior to Construction Certificate

That the proposal be amended to include a two level verandah addition to the north elevation of the Hotel as a mitigative measure to the impacts on the overall hotel form, its streetscape presence and on Bigge Park Conservation Area that will result from the removal of the Northern Wing. This two-level verandah should respond to the existing in height width and form and fabric of the existing verandah but also be recognisable in close inspection as new work (eg a simplified balustrade cast iron pattern). The verandah should start at a retained dividing wall at the end of the verandah on Bigge street and return along on the northern façade at least up to the curved upper level window above the staircase. The verandah should conform generally to the structure shown on the view on Option 3 Attachment 2. Liverpool City Council and its heritage advisors are to be satisfied as to the design and extent of the proposed verandah addition.

That the proposal be amended to reduce the width of the NeW Stables at the eastern end in the vicinity to the Hotel to provide a better spatial setting for the Hotel and a less crowded access way than that shown. (Note that the verandah above will in general terms require no more depth than the new fabric awning shown in the proposal.)

A full photographic archival record should be made of all the structures on the full development site including all structures proposed for removal.

A condition of consent should be that a mechanism be identified in the Long Term Maintenance Plan to ensure its implementation over time.

10.4 New Development Application

It is recommended that any consent for the current proposal exclude approval for the use and changes to the interior of the First and Second floors of the Commercial Hotel and that a further DA be required to be submitted for Liverpool City Council approval for the use and adaptive reuse changes and to be in accordance with the intention of the sketches that form Attachment 4 to this report (see 8.4) to retain existing circulation spaces (including halls and dividing walls and arches) and the spaces of existing bedroom spaces generally while providing for some limited enlarged areas with partial wall removals and also providing for a lift and accessible toilets on both levels, once again generally in accordance with the intent shown on the sketch plans in Attachment 4 to this report.

Any consent for this current DA should include that approval and implementation of

conservation and adaptive reuse works to the Commercial Hotel should be undertaken prior to Occupation Certificate for the tower building.

10.5 Additional Development Guidelines for new towers in LCC CBD

As recommended in 9.3, LCC should develop, separately to this DA, guidelines for future tower development in the Liverpool City centre to ensure that future development respects the urban form of the Hoddle Grid historic town plan and that the scale and the form of new development at a streetscape pedestrian level respects and reinforces that urban form.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'G Ashley', written in a cursive style.

Geoff Ashley
PRINCIPAL

25 January 2019

Attachment 1: Photographs of the Commercial Hotel site relevant to this report

Attachment 2: Three site development options to mitigate heritage impacts

Attachment 3: Sketch plans for the First and Second floors to retain heritage spaces and fabric.

Attachment 1

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Figure 1 View of the gable roof of Stables from space FF16



Figure 2 Looking towards the development site from Light Horse Park. I believe that part of Light Horse Park will be overshadowed in late afternoons in mid June

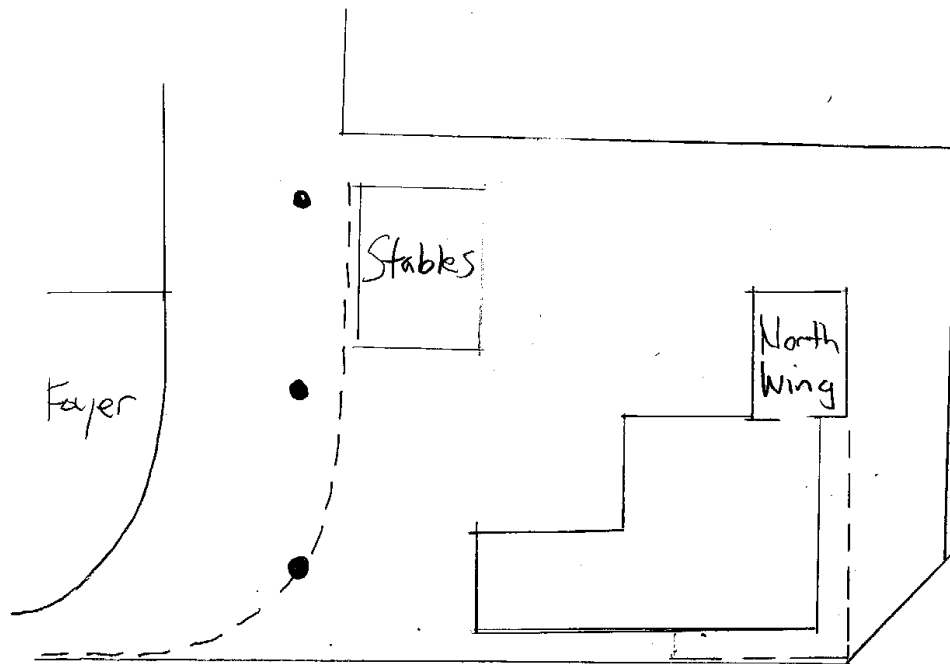


Figure 3 Current building on Scott Street that should be archivally recorded as a condition of consent for any DA approval

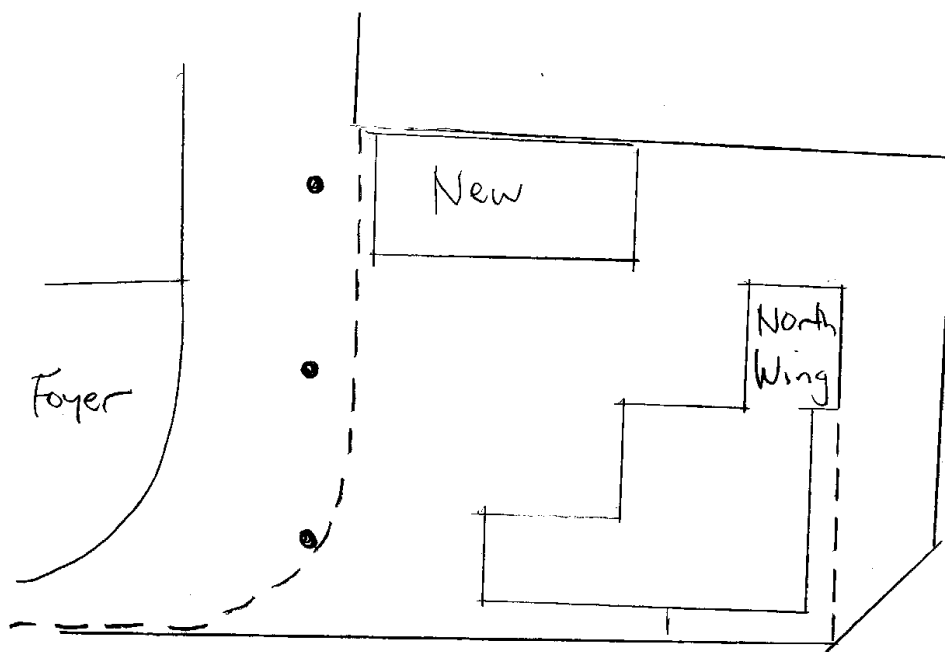


Figure 4 Space FF16 (pink colour) that could form the model of a two level verandah on this elevation to reduce impacts from the loss of overall form if the Northern wing was approved for removal.

Attachment 2



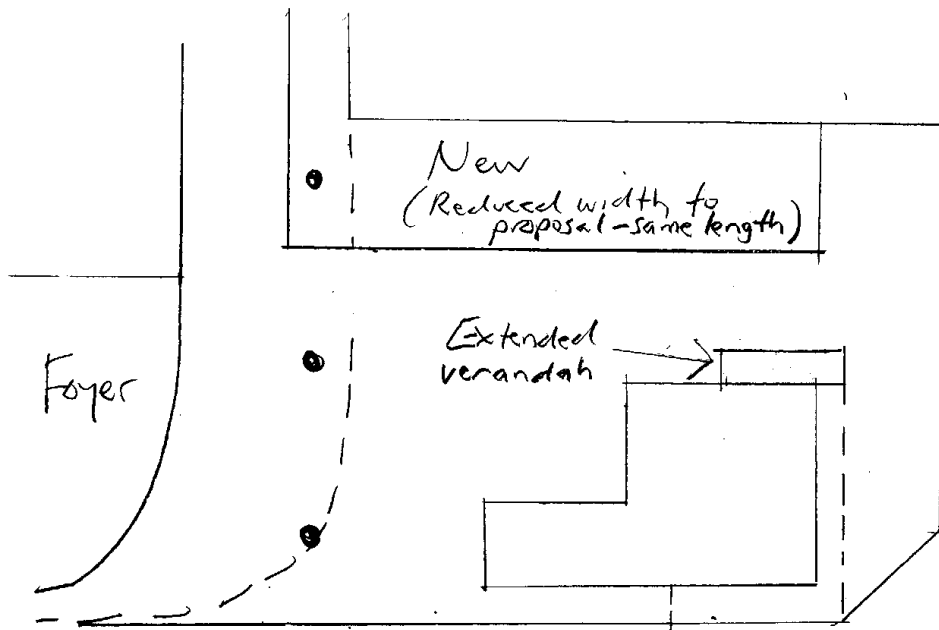
Option 1: Retain stables & north wing



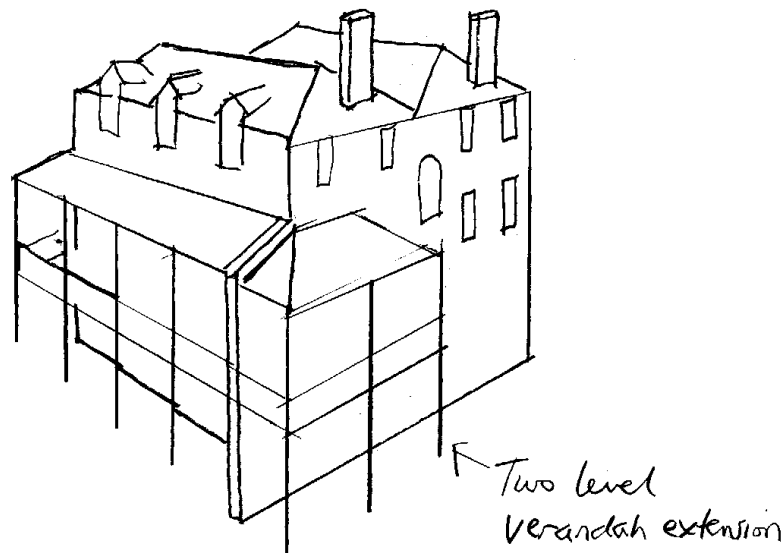
Option 2: Retain North Wing

Commercial Hotel site development options to retain heritage values: Option 1 is the ideal heritage outcome and retains both the Stables and the Northern Wing. Option 2 retains some heritage values with the retention of the Northern Wing but the significant Stables is removed.

Attachment 2

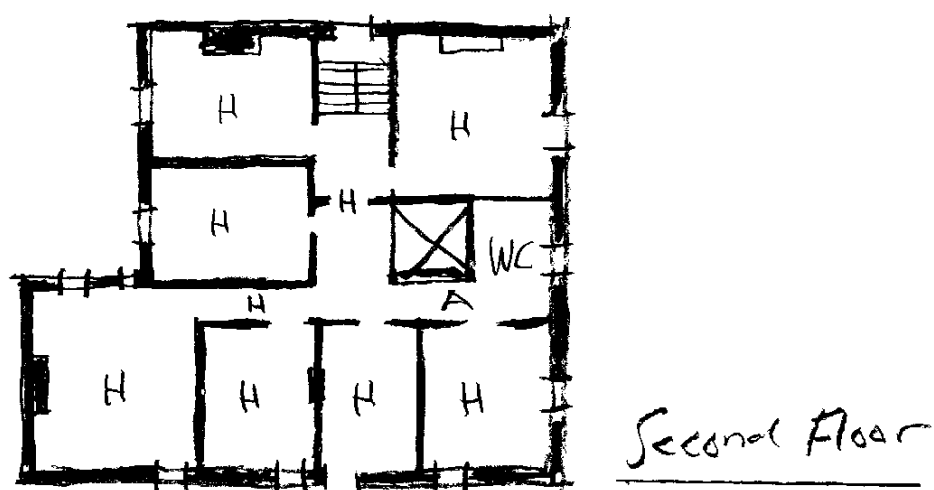
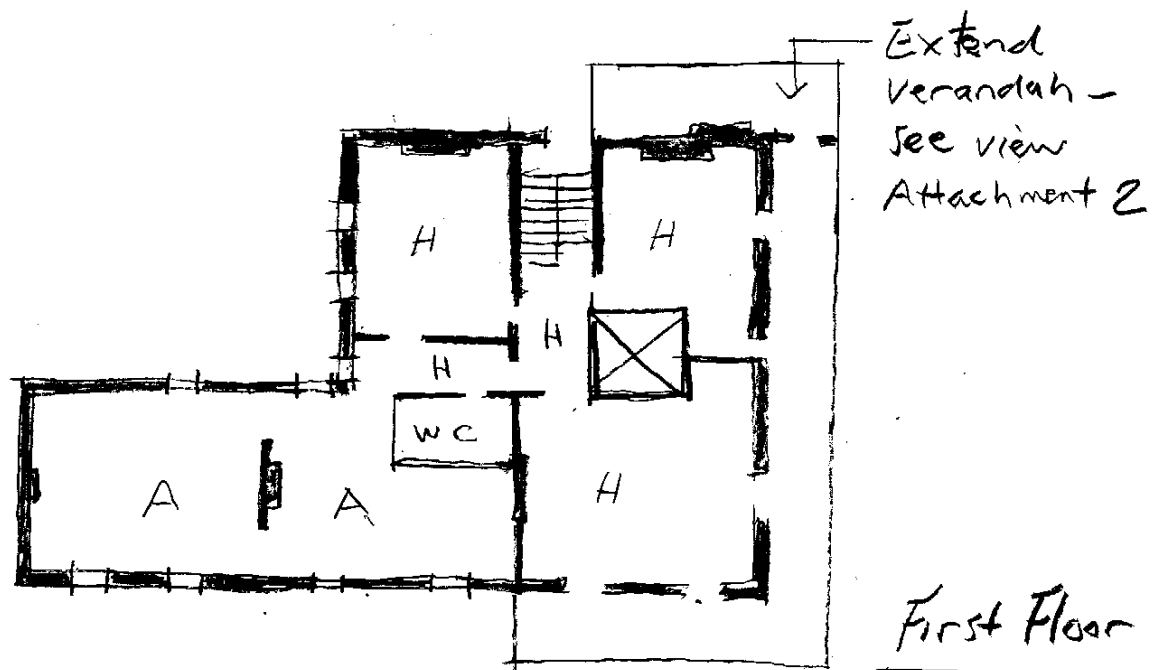


Option 3: Extend two level verandah
- see view below.



Option 3: Minimum heritage outcome to mitigate the impacts from the removal of the Northern Wing on the form and streetscape presence of the Commercial Hotel. This includes a reduction in the width of the new structure to the north to that shown on the proposal (by 1.2m) to provide an improved spatial setting for the Hotel.

Attachment 3



H = Heritage Space retained
A = Heritage space adapted
Not to Scale

Sketches showing alternative designs to the proposal to indicate how heritage spaces and fabric can be retained on the first and Second floors of the Commercial Hotel while providing for new uses. On the first-floor circulation halls and arches are retained along with three former bedroom spaces and with a larger shared space on Scott Street. The second floor has all circulation spaces and arches and all except one-bedroom space retained. On both levels a lift and accessible toilet is provided.