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SYDNEY NSW 2000**

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19 DECEMBER 2022

Thomas Piovesan
Department of Planning and Environment
Via email: Thomas.Piovesan@dpie.nsw.gov.au.

Dear Thomas,

TOGA CENTRAL (FORMER PARCEL POST BUILDING)– SSD-33258337 - RESPONSE TO SUBMISSIONS (BUILT HERITAGE)

This letter has been prepared in response to the agency comments relevant to SSD – 33258337. This letter specifically responds to the heritage comments provided in the following:

- Advice on Environmental Impact Statement provided by the City of Sydney dated 30 September 2022 (SSD-33258337),
- Referral advice from Heritage NSW dated 16 September 2022 (DOC22/816136-3)

Department of Planning and Environment (EF21/18415)

The following responses to the submissions are the result of consultation between TOGA, Bates Smart, Freeman Ryan Design and Urbis Heritage.

This response accompanies a revised Heritage Impact Statement, Schedule of Conservation Works (Internal) and Conservation Management Plan which reflect agency comments as noted in this response.

Please note that reference should also be made to responses prepared by Apex Diagnostics, Freeman Ryan Design and Urbis Archaeology which respond to specialist heritage issues (interpretation, conservation of fabric and archaeology).

CITY OF SYDNEY COUNCIL

3.1 Demolition of external facades

The proposal involves extensive demolition of the eastern facade beyond that which occurred in 1998-99, which will reduce it to three facades and will have an adverse impact on the heritage significance of the building and is not supported by the City. While the altered section of the eastern facade is graded as being of moderate significance in the Conservation Management Plan (CMP) prepared by Urbis, the south-eastern curved corner is of exceptional significance.

Recommendation:

- ***The City does not support the extent of demolition to the eastern façade and recommends amending the design to allow for the retention of the south-eastern corner of the building, which is of exceptional heritage significance. This may require the eastern pod to be relocated further eastwards and be made parallel to the eastern facade.***

The eastern pod is a structural necessity for the proposed development. It has been appropriately located to the east of the former Parcel Post Building, as the façade of least significance for the reasons outlined in detail in the HIS. Even so, the heritage benefit of interpreting the building in the round despite demolition of some reconstructed and original fabric to the highly modified east façade is acknowledged. Therefore, treatment of the proposed eastern pod and eastern façade ensures a clear legibility of the northeast corner of the building through a substantial return of the east façade to the south.

To achieve the extent of the above return (and achieve the structural requirements) it is required to locate the core to the south of the eastern façade which would result in the loss of the southeast corner. Refer to the accompanying architectural response which explains the necessity of the blade wall which connects the east core, the smaller core within the floorplate of the fPPB and the Y columns above.

No part of the building is identified to be of exceptional significance in the CMP as stated in the submission, however the impact on fabric of high significance is acknowledged. Urbis considers the impact to be an acceptable outcome given the substantial retention of the northeast corner and the lack of contribution that the southeast corner makes to the visual context of the Devonshire Street Tunnel and Henry Deane Plaza.

Notwithstanding Urbis' assessment of impact, the issue raised in the Council submission is acknowledged and the treatment of the southeast corner has been revised following discussions between Bates Smart, TOGA and Urbis Heritage to treat the corner in a logical way that would lead to a more acceptable heritage outcome. It should be noted that this approach was agreed with the Design Integrity Panel at the DIP 3 Session which occurred on the 7th June 2022.

The demolition of the corner and incorporation of the return of the existing quoining and façade detail on the south façade, to the east façade, are retained in the proposed design. This would maintain the appearance of the façade as a rational, finished façade within the context of the development and would maintain the symmetry of the facade. This will create the appearance of the south-eastern corner despite its demolition, thereby contributing to a more sophisticated, interpretive understanding of the original massing and scale of the fPPB.

The DIP also supported maintenance of unrendered brickwork on the inside face of the wall to the point where it intersects the new lift core. This brickwork return would ensure that the southern façade has sufficient depth to be legible as part of the structure behind.

This change is, in Urbis' opinion, a good heritage outcome, sympathetic to the significance of the fPPB and the greater Central Railway Group.

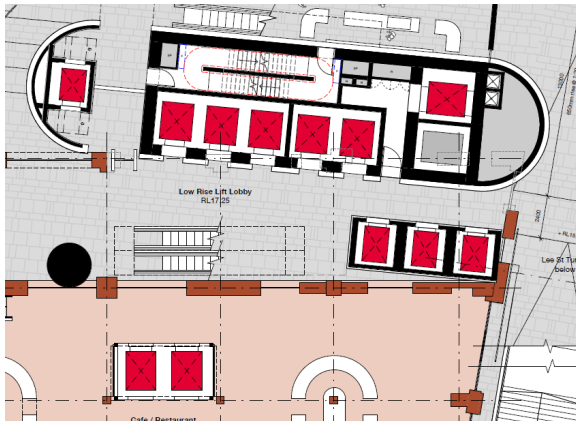


Figure 1 General Arrangement Lower Ground Level, Drawing no. 10GR0000

Source: Bates Smart, SSDA Submitted drawings, 17.06.2022

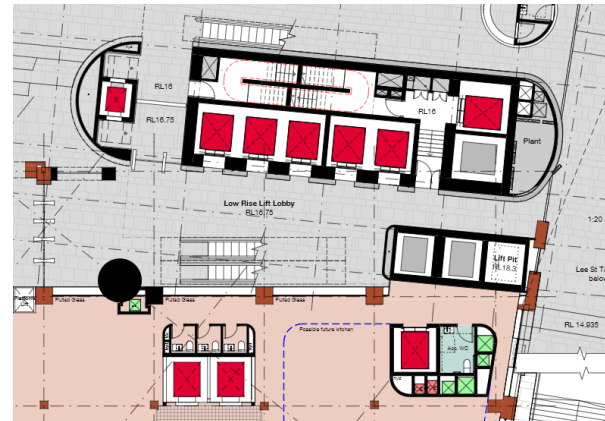


Figure 2 General Arrangement Lower Ground Level, Drawing no. 10GR0000

Source: Bates Smart, Revised drawings, 16.11.2022

3.2 Internal demolition

The proposed internal demolition of floor fabric for the void between Grids A-B and I-K (the eastern-most void) is not supported as it has no historical basis, removes fabric of moderate significance, removes the spatial appreciation of each floor and reduces the useable space of the building. The western-most void is supported as it is reasonably consistent with historic additions that incorporated a central light well.

The demolition of fabric for the internal voids creates potential risk for damage to significant detailing of the stucco of the columns because of the proximity of the edge of the columns to the zone of demolition. A heritage asset construction methodology should be provided to outline mitigation measures to limit potential risks to internal columns and finishes.

Recommendations:

- *The internal demolition of floor fabric for the void located between Grids A-B and I-K is not supported by the City.*
- *A heritage asset construction methodology should be provided to establish mitigation measures to limit any risks to the internal columns and finishes and to avoid adverse impacts. The Heritage Impact Statement should also address this risk.*

The purpose of the void space is to allow for additional natural lighting throughout the building. This will increase the amenity across a deep floorplate. Therefore a void has been retained between grid sections A-B and I-K, however the width of the void between Grids I-K has been reduced to minimise demolition of moderately significant fabric. The modified void would not occupy entire spaces between the structural grid and the void would therefore be discernible as a later insertion.

The retention of a void in this location is acceptable from a heritage perspective as the only elements of significance in the fPPB constitutes the internal grid and associated structural columns. The internal structure and fitout have historically been utilitarian and generic by design in order to better accommodate different uses. The remnant internal fabric, while significant as part of the structure, is therefore of no significant detail. It is structural by nature, and its removal in sections will not change

the character of the internal spaces or have an adverse heritage impact. The legibility of the internal spatial layout, particularly between floor levels, will be retained despite the inclusion of the void space.

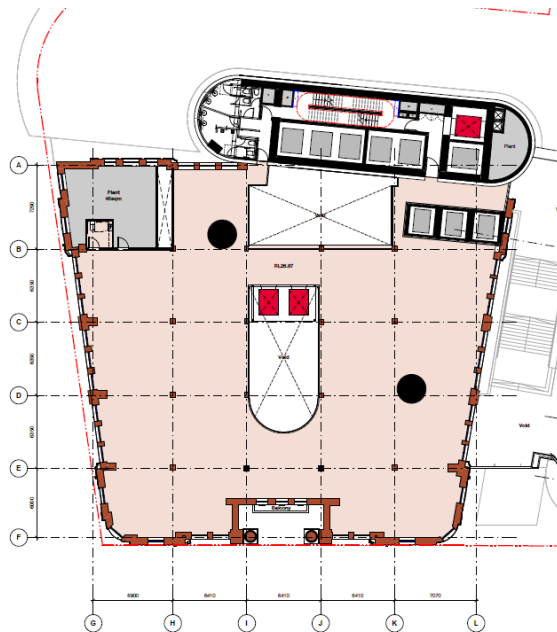


Figure 3 General Arrangement Plan, Level 02, Drawing no. 10L02000

Source: Bates Smart, SSDA Submitted drawings, 17.06.2022

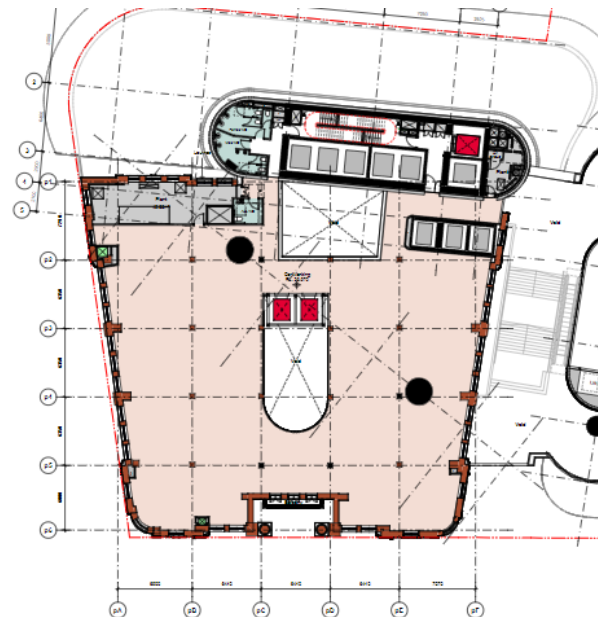


Figure 4 General Arrangement Plan, Level 02, Drawing no. 10L02000

Source: Bates Smart, Revised drawings, 16.11.2022

3.3 Demolition and disruption to interior configurations

The submitted Heritage Interpretation Strategy (HIS) states that the podium strategy is to minimise the intervention into original fabric of the fPPB and to retain as much of its existing structure as possible.

It is acknowledged that the proposed location of the two structural columns within the fPPB has been carefully considered and their introduction will not interrupt the presence of original structural components. However, the quantum of all proposed insertions and voids into the fPPB (in addition to the two columns) results in excessive demolition and fragmentation of the interior spaces and erodes the internal spatial configuration and historic character. The quantum is such that the proposal is inconsistent with CMP Policy 61.

Of particular concern is the quantum of insertions proposed within the building between Grids A and B (see Figure 2 below), which reduces the floor plates to a fragmented series of passageways. The plant room, column, void and lift core result in almost total demolition of the floor plates in this area

In particular, the proposed escalators are not supported as they alter the historic character of the building. Additionally, the demolition of fabric raises concerns of the potential risk of damage to significant internal detailing of the stucco of the internal columns.

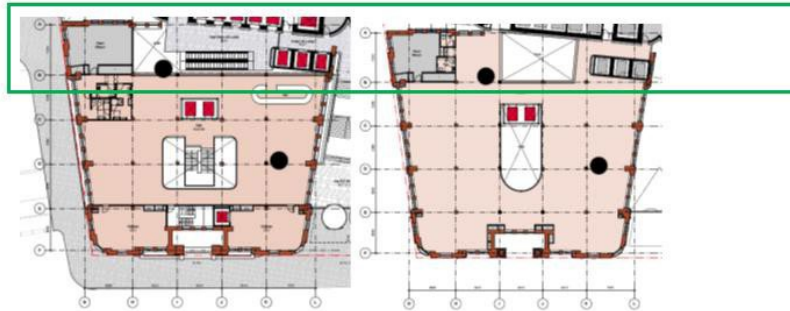


Figure 2: Ground floor plan (left) and Levels above ground level (right) with area of concern outlined in green

Recommendations:

The amount of internal demolition and subsequent fragmentation of each level of the former Parcel Post building should be reduced. To conserve the character and spatial integrity of each floor level, it is recommended that:

- *Consideration should be given to whether the proposed escalators and the lift core comprising three lifts servicing up to Level 19 between Grids K and L would be better relocated into the southern pod from a heritage perspective.*
- *The extent of insertions between Grids A and B should be minimised.*
- *A specific heritage asset construction methodology should be required to review the current proposed construction methodologies and to detail mitigation measures to limit potential risks to the internal columns and finishes.*

The proposed design has been revised to minimise the extent of the internal insertions and voids within the fPPB. It is acknowledged that the same quantum of insertions is proposed however, this revision minimises the scale of the insertions in line with CMP Policy 61.

The proposed relocation of the escalators and lift core between grid section K-L has been investigated however has been discounted from the revised design due to structural and operational feasibility. The presence of escalators and lift cores has been situated in this space as the most practical and logical option, to provide necessary structural stability with as little intervention into heritage fabric as possible. The core occupies an area to a corner of the building and it is not prominent within the floorplate. However, other modifications to the design as noted above will mitigate the impact of locating the escalators and lifts in this space.

The central atrium and stairwell will be reduced at lower ground and ground floor level to be in keeping with the levels above. In its prior design the atrium included a larger void over C-E and H-K from the lower ground level and up, with the overall central stairwell reducing in size to the upper levels. The modifications to this design will reduce the expanse of the stairwell and void above to within the C-E and I-J only. This change will subsequently result in the reduction of internal intervention into existing fabric.

To further reduce the amount of demolition and disruption to interiors, the plant rooms previously proposed to be located adjacent to the interior of the eastern elevation have been setback further away to the west. The legibility of the interior of the north east corner will therefore be somewhat enhanced.

As discussed with regards to the above recommendation, modifications to the design have considered the scale of intervention to fabric between grid section A-B. The scale of internal demolition and intervention in this area has also been reduced overall as seen in the modification to the void space, the plant room and further consideration to the location of the escalators and lift core. In short, the overall amount of internal demolition required has been reduced where possible and will result in a more acceptable use of the space from a heritage perspective.

A significantly less intensive program will be inserted to the interior area adjacent to the western façade at ground floor. The previously proposed kitchens, stairs and lift have been relocated to better enable retention of the original spatial arrangement at ground floor.

A specific heritage asset construction methodology can be prepared as a Condition of Consent which includes a review of the current proposed construction methodologies and details mitigation measures to limit potential risks to the internal columns and finishes.

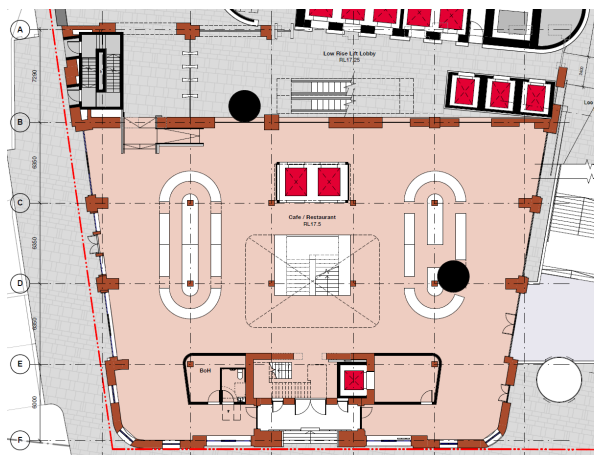


Figure 5 General Arrangement Lower Ground Level, Drawing no. 10GR0000

Source: Bates Smart, SSDA Submitted drawings, 17.06.2022



Figure 6 General Arrangement Lower Ground Level, Drawing no. 10GR0000

Source: Bates Smart, Revised drawings, 16.11.2022

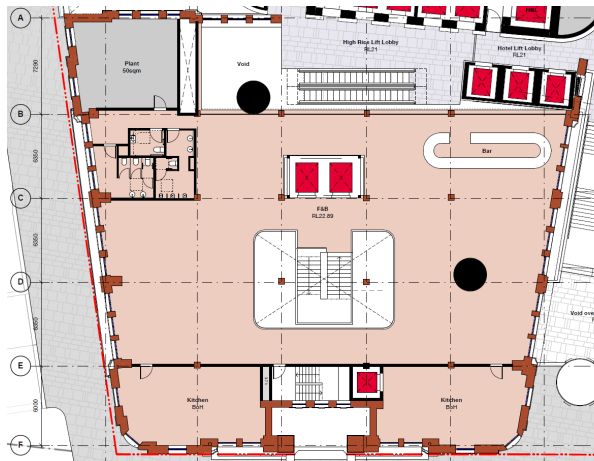


Figure 7 General Arrangement Ground Level, Drawing no. 10GR1000

Source: Bates Smart, SSDA Submitted drawings, 17.06.2022

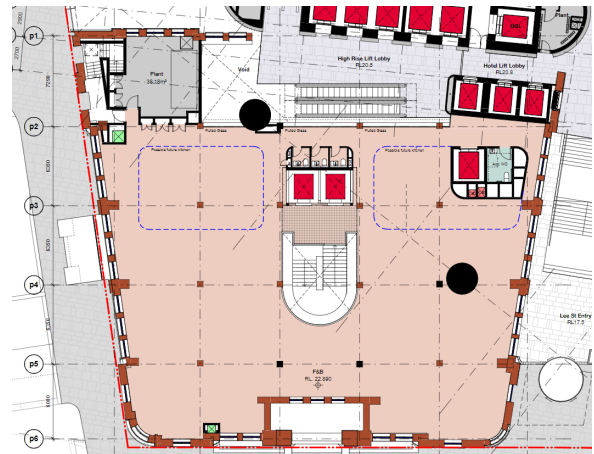


Figure 8 General Arrangement Ground Level, Drawing no. 10GR1000

Source: Bates Smart, Revised drawings, 16.11.2022

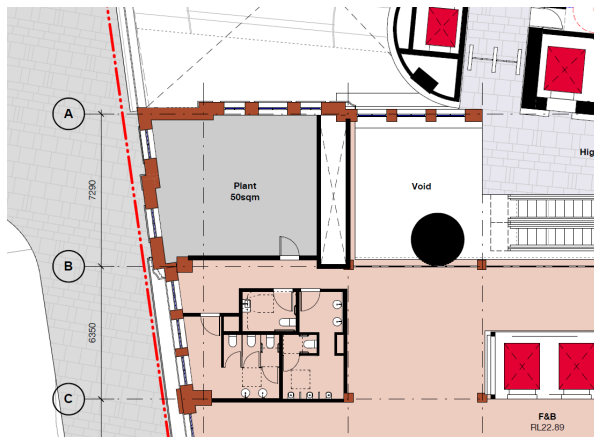


Figure 9 General Arrangement Ground Level, Drawing no. 10GR1000

Source: Bates Smart, SSDA Submitted drawings, 17.06.2022

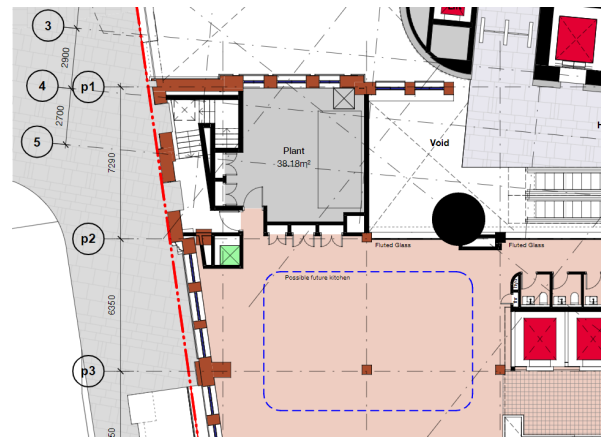


Figure 10 General Arrangement Ground Level, Drawing no. 10GR1000

Source: Bates Smart, Revised drawings, 16.11.2022

3.4 *Demolition of the former rear yard and retaining wall*

The recreation of the historical connection between the fPPB and the former Parcels Shed is supported. However, the quantum and extensive size of openings in the retaining wall of the rear yard is not supported as it would result in the loss of fabric and historic character. The extent of the proposed opening is excessive and beyond that envisaged in CMP Policy 87.

The alterations are too large and numerous to be considered sympathetic. Rather than facilitating connections, the space would become a throughfare, losing its definition, sheltered contained character and ability to interpret its former function and use. The loss of association and

interpretation is contrary to CMP Policy 88. Further, there is no detail as to whether the proposed work is consistent with CMP Policy 89.

The original arched openings to the former vehicle docks on the eastern façade should be retained and conserved or interpreted to the greatest extent feasible as per CMP Policy 40.

Recommendations:

- *The original portions of the retaining wall of the rear yard should be retained and conserved.*
- *The high relief decorative sandstone arch should be retained and conserved.*
- *To retain the heritage significance and historic character of the rear yard and to retain an interpretation of its associations, the number of openings and the size of openings should be substantially reduced.*
- *The Interpretation Strategy should be expanded to include specific interpretation of the former function of the rear yard.*

The retaining wall to the rear yard historically had at least two openings which contributed to the function of the place. The proposed modifications to the retaining wall will be made with consideration for creating a viable link between the subject site and the lower ground link zone with the neighbouring Atlassian building. This permeability will significantly contribute to the quality of this public domain area.

This link will both reinterpret the historical connection between the fPPB and the former Parcels Shed, whilst also contributing to the cohesion of the greater Western Gateway sub-precinct and Central Railway Group. The larger format openings into the wall relate to the proportions of the original openings in the east wall of the fPPB.

The arches through the retaining wall are proposed to be squared at the top to ensure they are easily identifiable as new, particularly the southern arches which are not original openings. Further, they have been designed to be sympathetic to the new vaulted ceilings within the lower ground link zone.

The decorative sandstone arch to Ambulance Avenue will be retained where possible with additional elements incorporated in the greater Heritage Interpretation Strategy prepared by Freeman Ryan. The future Interpretation Plan can propose devices which interpret the former function of the rear yard, with consideration for the interpretation devices being developed throughout the precinct.

The height of the wall is also to be raised to ensure that the wall which forms the balustrade along the western boundary of the Atlassian site at upper ground level is of a compliant height. This would involve raising the capping stone and construction several additional courses of brick. Urbis recommends that salvaged bricks removed from the openings below are to be used where possible.

3.5 External conservation works

Given the scale of the proposal, the proposed conservation of the building must be to the highest quality. This includes all the actions of conservation as defined by the Australian ICOMOS Burra Charter.

Recommendations:

- ***The proposal should take full advantage of the opportunity to conserve the building to the highest level of excellence. All significant building elements, spaces and fabric, both internally and externally should be retained and conserved in accordance with the CMP, including Policy 13.***
- ***The Schedule of Conservation Works should be expanded to ensure the inclusion of all defective exterior fabric including all sandstone, brick, steel framed windows, timber and bronze work.***
- ***A comprehensive programme of salt analysis of the masonry should be undertaken to identify areas that require desalination, and the Schedule of proposed conservation works expanded accordingly. The recommended processes of desalination should be specified.***
- ***The Schedule of Conservation Works should be expanded to conserve early post office signage on the principal western and northern facades.***
- ***The Schedule of Conservation Works should be expanded to include the reversal of unsympathetic alterations to the facades. Reconstructive works advised by the CMP including the interpretive reinstatement of traditional bronze swing doors, side lights and transom to western entry based on the original drawings and reconstructive works to northern and southern shopfronts should be included.***
- ***The schedule should be accompanied by a Specification of Works to ensure all fabric is carefully conserved in accordance with best practise.***
- ***The schedule should be accompanied by detailed architectural drawings to clearly identify the scope and location of work, and that to ensure that details such as sandstone and brickwork detailing, and bronze and steel window framing, where reconstructed, are accurately replicated.***
- ***A programme of costed heritage asset cyclic maintenance works should be developed alongside the Schedule to capture works that may not be necessary now but will be in the future.***

Refer to the updated Schedule of Conservation Works prepared by Apex Diagnostics for further information regarding all points above. The below responds only to the fifth point which relates to the reversal of unsympathetic alterations.

The Heritage Impact Statement notes the opportunity to reinterpret the original western entry and notes that the original shopfronts would be retained and missing original elements reconstructed. The western entry will be reinstated and the significant original fabric of the shopfronts of the south facade

such as stallboard lights, toplights and steel framing will be retained and conserved. Where the shopfronts are no longer required, the stallboard lights will be reinstated to original detail as per CMP Policy 38. The eastern most bay of the southern façade will be retained and appear as an entrance.

Detailed drawings can be prepared as a Condition of Consent which will ensure the ground floor fenestration matches the original in terms of proportions, profile and materiality. Drawings of the entries and shopfronts will be prepared in line with documentary evidence. Apex, Urbis, Bates Smart and the manufactures, will collaborate prior to the issue of a Construction Certificate to faithfully detail these elements. Shop drawings for reconstructed elements can be available to the consent authorities if requested for comment prior to manufacture.

3.6 Internal conservation works

Recommendations:

- ***It is recommended that the Internal Schedule of Conservation Works be expanded to include the following as a minimum:***
- ***Stucco repairs to the original columns and moulded detailing of the column capitals.***
- ***Investigation to determine whether original fabric remains concealed by later fitouts and finishes. This should include as a minimum:***
 - ***Investigation of the ground floor public space to determine whether the original terrazzo floor with mosaic decoration remains extant beneath the current tiled floor finish.***
 - ***The basement level to determine whether original columns remain extant, currently covered by fitouts.***
 - ***If original fabric remains, the schedule should be expanded to include conservation of such fabric, consistent with CMP Policies 59 and 60.***

The Schedule of Conservation Works for the fPPB interior has been updated by Urbis with regard to the extent of recommended appropriate repairs to known significant heritage fabric. This includes, but is not limited to, undertaking stucco repairs to original columns and moulded detailing to the column capitals. There is minimal significant internal fabric remaining within the fPPB as of 2022.

Further investigation into the potential of additional remnant significant fabric is not being undertaken at this time. However, it is intended that the recommendation for further investigation be carried out as part of the construction process. The Schedule of Conservation Works has been updated to reflect this recommendation and has been submitted with this response.

3.7 Connection between the fPPB and the proposed additions

The proposed atrium connecting the southern pod to the fPPB will have a negative impact on the visual appreciation of the building.

The proposed raised levels of the southern pod that align with the Henry Deane Plaza result in two of the three original significant shopfront openings of the ground floor (between Grids B and D) being visually covered by the stair down to the Lee Street level. A narrow void is provided between the stair and the two shopfronts. This inadequate visual curtilage has negative impacts on the appreciation and setting of the fPPB.

Recommendations:

- *The stair within the atrium adjacent to the southern pod should be offset from the southern facade of the fPPB by a considerable distance to allow for greater visual curtilage around the two former bronze framed shopfronts maintaining visibility to them and their ability to function.*
- *The plaza levels could be modified to be lower to reduce the overall length of the stair. The extent of the proposed atrium westwards along the southern facade could then be reduced.*
- *The architectural detailing of the new atrium and its connection to the facade of fPPB will need to be carefully considered to limit interference into heritage fabric including the horizontal sandstone cornice and vertical faces of the building. As the podium will limit views to the southern facade of the fPPB, the type of glazing within the atrium will also need to be carefully considered to achieve a high level of clarity whilst satisfying Section J of the BCA.*
- *Significant original fabric of the shopfronts of the south facade such as stallboard lights, toplights and steel framing should be retained and conserved. Where the shopfronts are no longer required, the stallboard lights should be reinstated to original detail as per CMP Policy 38. The eastern most bay of the southern facade should be retained as (or appear as) an entrance in accordance with the original design intent as per CMP Policy 39.*

The stair within the atrium adjacent to the southern pod has been further offset from the southern facade of the fPPB. It would be 900mm offset from the façade and the head height constraints in the tunnel below would be limited. The stair would therefore be entirely separate to the southern façade.

The floor level for the hotel arrival space has been reduced in height from RL 21 to RL 20.8 to further reduce the overall length and height of the stairwell in order to minimise this visual impact.

Construction drawings for interface between the new atrium and the southern façade of the building will be reviewed by Urbis prior to CC. These are to include overall location of interface in relation to significant sandstone detailing and window levels, flashings, fixings (type, number and location), and samples for the proposed glass.

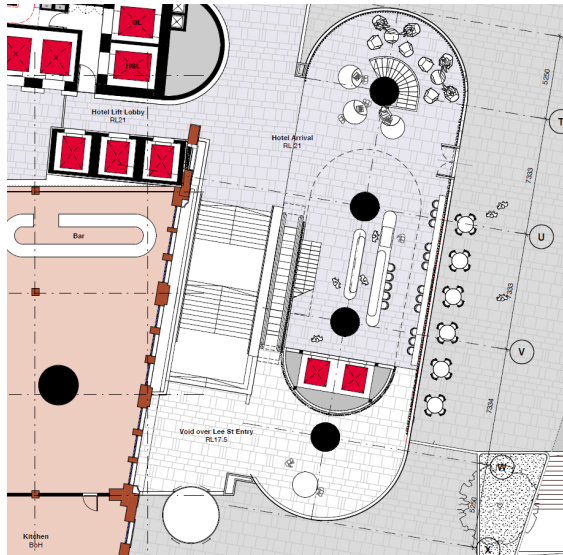


Figure 11 General Arrangement Ground Level, Drawing no. 10GR1000

Source: Bates Smart, SSDA Submitted drawings, 17.06.2022

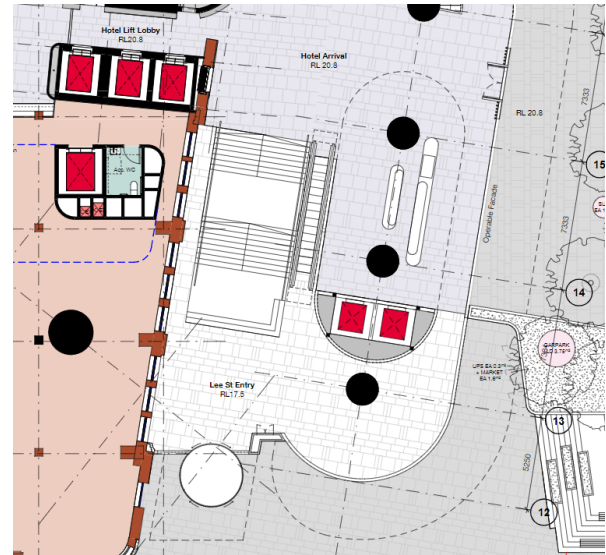


Figure 12 General Arrangement Ground Level, Drawing no. 10GR1000

Source: Bates Smart, Revised drawings, 16.11.2022

3.8 Heritage interpretation

The HIS identifies four key themes for interpretation. A key theme that has not been included is the role and function of the building as the former Parcel Post building and its relationship with the whole of the Central Railway Group.

The HIS fails to identify key actions related to the retention, conservation and restoration of significant fabric, spaces and relationships within the site. As noted in CMP Policy 99, this is the highest form of interpretation.

Recommendations:

- *The HIS should be revised to consider the role and function of the building as the former Parcel Post building and its relationship with the whole of the Central Railway Group.*
- *The interpretation strategies within the HIS should include more pertinent locations relating to the building itself. Interpretation should be located on each facade, within the building on each level and in the more frequented space such as lift lobbies.*
- *The HIS should acknowledge significant elements to be retained, exposed and interpreted in accordance with the CMP. Where development or works are proposed, there is a significant opportunity to reinterpret the original character of the place by stripping back the contemporary fitout and retrieving the open character of the spaces. There is also an opportunity to reinterpret known original finishes in a contemporary manner.*

The Heritage Interpretation Strategy prepared by Freeman Ryan will be updated to clarify the key actions proposed with regards to retention, conservation and restoration related to the fPPB. Notwithstanding, the development will incorporate the implementation of heritage interpretation, a public art strategy and the restoration and conservation of internal and external significant fabric. Examples of the key actions intended to facilitate this outcome include:

- Significant elements to be retained will include the general form and scale of the fPPB, the north, south and western elevations, and the retaining wall to the rear yard. Fabric associated with these elements will be retained except for where they are damaged and required to be replaced in line with the recommendations of the Schedules of Conservation Works prepared by Apex Diagnostics (external) and Urbis (internal).
- The roofscape, which has been modified since initial construction, will involve interpretive new mansard styling as part of the development evocative of its original aesthetic and dually visually separate the fPPB from the cantilevered additions above.
- The retention of the quoining detail to the south-east corner of the fPPB will create the aesthetic appearance of the south-eastern corner despite its demolition, thereby contributing to a more sophisticated, interpretive understanding of the original massing and scale of the fPPB.
- Additional public artwork and interpretive detailing as outlined in the Public Artwork Strategy prepared by Tilt and the Heritage Interpretation Strategy prepared by Freeman Ryan will form a significant part of the design development. It is recommended that these be developed as a Public Artwork Plan and Heritage Interpretation Plan with implementation to be undertaken as per the plans per the plan prior to obtaining an Occupation Certificate.

The role and function of the fPPB and its relationship with the surrounding Central Railway Group will be incorporated into the general historic significance theme of the fPPB (called 'Lines of Communication') with specific references to its individual history and greater cultural relevance to be developed in the later phases of design development. This will in turn be expanded to capture the greater significance of Western Gateway sub-precinct.

It is disagreed that interpretation should be increased to the extent noted in the recommendations. It is intended that heritage interpretation will be a major focus in the design and has been given consideration to date, however it is not the intention of the proposed development to over-utilise heritage interpretation in lieu of the retention and conservation of significant fabric where possible. It is noted that an over-use of interpretation, beyond what is deemed appropriate, sympathetic and logical, would dilute the positive impact of the inclusion of heritage interpretation devices.

More detailed heritage interpretation design and methods will be outlined in the subsequent Heritage Interpretation Plan for implementation recommended for development during the design development phase prior to the receipt of a construction certificate.

3.9 *Mitigation measures*

Recommendation

- ***The mitigation measures relating to Built Heritage should include heritage interpretation and informing the Public Art on the site.***

Noted. Refer to mitigation measures in updated HIS.

HERITAGE COUNCIL

Ground Plane Considerations and Public Realm Integration

We have consistently emphasised the critical relationship between the former Parcels Post Office and the broader landscape should be strengthened by the ground plane considerations and public realm integration. The EIS proposal has sufficiently detailed how these has been addressed to encourage pedestrian access and foster public engagement across the Western Gateway sub-precinct and broader area.

The EIS proposal identifies the future potential to reinterpret the original western entry from early architectural plans. We support this initiative because it will enhance the setting and actively engage with the community.

We strongly advocate for ground plane considerations and public realm integration to result in a design outcome that maximises open public access complemented by heritage sympathetically designed food and beverage concepts to invite the public in. This approach should maintain all original entrances where possible.

The revised design will retain original entrances to the north, south and west with consideration for activating the ground planes. As detailed above in this response, reconstruction of previously removed original shopfronts and the western entrance is proposed.

Further, links and relationships across the greater Western Gateway sub-precinct have also been considered to encourage pedestrian access and public engagement. Collaboration with the neighbouring Atlassian site has also been a significant part of the design development. Please refer to the accompanying architectural responses which details public domain integration.

Any further development of ground plane activation and public realm integration will be subject to consultation with Urbis, the established heritage principles supported by HNSW and further approvals if required.

Conservation Management Plan (CMP)

We understand that this CMP should be read in conjunction with the Central Precinct Renewal CMP (August 2022) prepared by Artefact Heritage and have separately provided comments as part of our public submission to the Central State Significant Precinct rezoning proposal that was on public exhibition from 22 August to 4 October 2022.

We find the 2022 CMP prepared by Urbis to generally satisfy the Secretary's Environmental Assessments Requirements (SEARs). However, we do recommend that the original internal spatial layout and configuration be recognised for its heritage significance and a corresponding policy be included to reinstate these, where feasible.

There is little evidence of the original internal layout. The interiors of the building were intentionally open plan to ensure the utility of the building. The Conservation Management Plan has been updated to acknowledge that the original open plan spatial quality has some significance. The CMP includes a new policy which acknowledges the significant of the spatial quality however allows sympathetic interventions to facilitate the reasonable use of the building subject to heritage advice.

Interpretation

We understand that the Heritage Interpretation Strategy is preliminary and will be further developed in consultation with the relevant stakeholders. The heritage interpretation should cohesively integrate with the former Parcels Post Office building, Western Gateway sub-precinct and the broader Central Station precinct.

We have requested TOGA to work with the neighbouring stakeholders, Atlassian and Dexus Frasers to jointly present on the precinct wide heritage interpretation strategy. We commend TOGA's efforts to date and look forward to the scheduled presentation at our 5 October 2022 Heritage Council meeting.

We strongly encourage continued engagement with Western Gateway Sub-precinct and Central Precinct stakeholders in the development and progress of the precinct-wide heritage interpretation.

Noted.

Historical Archaeology

To achieve good heritage outcomes, we recommend that the Historical Archaeological Impact Assessment could benefit from further consideration of the management of State significant archaeology.

For example, in the event that remains of the Benevolent Asylum were uncovered, such options could include archaeological preservation in situ (avoidance/ redesign), appropriate mitigation measures and interpretation opportunities.

The recommendations outline that 'Heritage NSW should be notified if the find is identified as a relic, through the submission of a Section 146 notification'. Under Section 146 of the Heritage Act 1977 (the Act), Heritage Council of NSW should be notified if either known or likely/possible relic(s) are discovered. Section 146 of the Act is not switched off by the Environmental Planning & Assessment Act 1979. In addition, the definition of a relic provided in Section 2.1.1 has been superseded and the document should be updated to reflect this.

Noted.

Aboriginal Cultural Heritage

Heritage NSW has separately provided advice relating to Aboriginal Cultural Heritage. The referral advice should be read in conjunction with this referral advice.

Noted.

Recommended Conditions

We welcome the appropriate opportunity to recommend conditions to mitigate the potential heritage impacts by the proposal at the Response to Submissions (RtS) stage.

We appreciate TOGA's engagement with us to date and strongly encourage consultation and engagement with both the Heritage Council and the Heritage NSW (as our delegate) during the continued development of the proposal and associated documentation for the RtS stage.

It is our opinion that the EIS proposal has sufficiently taken account of the site's heritage significance and has demonstrated how the design development has taken this in consideration

Noted.

DEPARTMENT OF PLANNING AND ENVIRONMENT

3. The Department notes Council's concern about the heritage impact of the demolition of the south-east corner of the fPPb. Provide additional information on the option analysis that informed the design of the proposal, including consideration of the amenity, built form and setback and visual implications of an option to retain the south-east corner of the fPPb.

4. The Department notes the concerns raised by Council about the extent of proposed internal demolition and reconfiguration and the number, size and proportion of new openings within the rear yard retaining wall. In addition, the Heritage Council has stated the internal spatial layout and configuration of the fPPb has heritage significance and should be reinstated where possible. The Department recommends the proposal is further refined/amended to address the above key comments raised by Council and the Heritage Council to ensure heritage impacts are minimised.

5. Consider options to relocate/redesign the stair case within the atrium between the fPPb and the southern pill to improve the visibility former bronze frames shopfronts (fPPb southern façade). Options could include relocating the stair case further eastwards, narrowing the width of the stair case or another suitable alternative.

These revisions have been discussed in our responses to the City of Sydney.

NATIONAL TRUST

The National Trust object, in the strongest possible terms, to this proposal which will have an irreversible detrimental impact upon the 1913 Parcels Post Building. Designed by the NSW Government Architect, the Parcels Post Building was intended to be a landmark building to be seen "in the round" as a key component of Sydney's Central Railway precinct. This proposal involves significant demolition to this building.

The design merits of the new hotel building cannot justify its placement on top of and completely around two sides of what was and must remain a landmark building at the gateway to Sydney.

The proposal is unacceptable because:

- **The parcels post office is locally listed by the City of Sydney (Item #1855). It is also included as part of the State Listed Sydney Terminal and Central Railway Stations Group (SHR #01255). This should allow protective measures for the site, however the proposed development does very little to conserve these significant qualities.**

The retention of the landmark qualities of the former Parcels Post Building has been a key driver of all stages of design development for the previous Planning Proposal and this SSDA. The well-considered massing which has been the subject of substantial consultation, a Planning Proposal and concept envelope, and a Design Guideline concentrates mass to areas of less significance. The previously approved envelope was designed in consultation with the Design Review Panel as well as the City of Sydney Council and Heritage NSW. The current proposal is the result of an intensive design excellence process involving several iterations of revisions to the plans following consultation with the Design Integrity Panel.

There is some impact on the qualities of the building which has been recognised through the process however, this project however has its genesis in a broad strategic vision for the precinct which acknowledges the need to reconcile heritage precincts with transformational change. The building will

remain prominent, it will be utilised, and it will at the centre of an exciting new precinct which will revitalise the Central Station Precinct into the future. This is a positive heritage outcome despite the loss of some fabric.

- ***The scale of the proposal overwhelms the historic Parcels Post Building. It removes views to and from the building, overshadows it, and changes its readability from an important element of Central Station and Railway Square to a diminished footnote in the area.***

The scale of the development is the result of one previous Planning panel. The scale of the development must be contextualised within the Western Gateway sub precinct and the Broader Central Precinct. Both Blocks A and B within the Western Gateway sub precinct are subject to approval which will result in a tower of a similar height to that proposed. Blocks A and B have a similar relationship with Central Station as the subject site. Block A in particular, which comprises an item which forms part of the Central Station SHR listing, is located directly adjacent to the station. Block A is located between the station and the subject site.

The proposal on Block C includes a slender tower on the site that maintains the existing former Parcels Post building as a prominent feature in the public domain. The tower will have a minimal additional impact on the legibility of the setting or the heritage item when considered in the context of the massing on Blocks A and B in views around the area.

- ***The proposal involves significant demolition to the Parcels Post Building, with a full two-thirds of the east façade set to be demolished, including the entire south-east corner with its complex concave and convex brick curves.***

The majority of the façade referenced in this comment is reconstructed fabric of less significant. It is appropriate that the changes are concentrated to this façade. The demolition of the south eastern corner has been further explained above in this response and the response has been resolved in conjunction with the Design Integrity Panel.

- ***The Heritage Impact Statement does not properly assess the negative effects of this development upon the building. It supports large scale demolition when, in the opinion of the National Trust, there is no need for the extent of demolition (particularly to the external elevations) to facilitate a proposed new addition.***

Noted. Updates to the HIS have been made where relevant.

- ***The documentation for this development is inconsistent, with the extent of demolition not accurately shown.***

Refer other responses.

- ***The Visual Impact Analysis is misleading in its representation of visual impact.***

Refer VIA response provided under separate cover.

CONCLUSION

Urbis Heritage has considered all submission responses in our ongoing consultation and contribution to the design modifications developed with TOGA and Bates Smart. The revised design has taken recommendations made by all parties onboard with considerations made for the best heritage outcome to both preserve the significance of the fPPB and incorporate it into the new, revitalised Western Gateway sub-precinct through the use of high-high level heritage interpretation.



Should you require anything further, please do not hesitate to contact the undersigned.

Kind regards,

A handwritten signature in black ink, appearing to read "Stephen Davies". The signature is fluid and cursive, with a small dot at the end.

Stephen Davies
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