

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

URBIS.COM.AU  
Urbis Ltd  
ABN 50 105 256 228

## **TOGA CENTRAL (FORMER PARCEL POST BUILDING)– MODIFICATION TO SSD-20240923 - RESPONSE TO SUBMISSIONS (BUILT HERITAGE)**

This letter has been prepared in response to the agency comments relevant to Modification 2 of SSD – 20240923. This letter specifically responds to the heritage comments provided by City of Sydney, Heritage NSW and the National Trust. Comments are reproduced in bold below with a response in standard text below each.

This letter also sets out an assessment of impact of items of work that have been added since the Modification was submitted.

### **RESPONSE TO COMMENTS - DEPARTMENT OF PLANNING, HOUSING AND INFRASTRUCTURE**

**Noting the concerns of Council and Heritage NSW, provide additional clarification and justification for the removal of part of the southern section of heritage brick retaining wall and consider options for its retention/reinstatement.**

Please see responses below in this letter.

### **RESPONSE TO COMMENTS - CITY OF SYDNEY COUNCIL**

#### **Reorientation of internal stair**

**The City is concerned that the proposed stair and additional planting appears to abut the fPPb. The approved design provided a space, separating old and new, between the stair and the walls of the heritage building. This allowed for the facade to be visible. The proposal obscures the heritage fabric which is not supported. Additionally, it is recommended that the escalator be retained for ease of pedestrian movement.**

The addition does not abut the fPPb. It has a substantial setback from it as shown in the design report. The south façade will be easily visible as viewers move from the west. The planters occupy space that was previously occupied by the approved stairs, they don't encroach further towards the south façade than the stairs.

There is no change proposed to the relationship between the approved stairs and the southern façade as shown in the comparison below.

Pedestrian movement requirements are to be addressed by others.

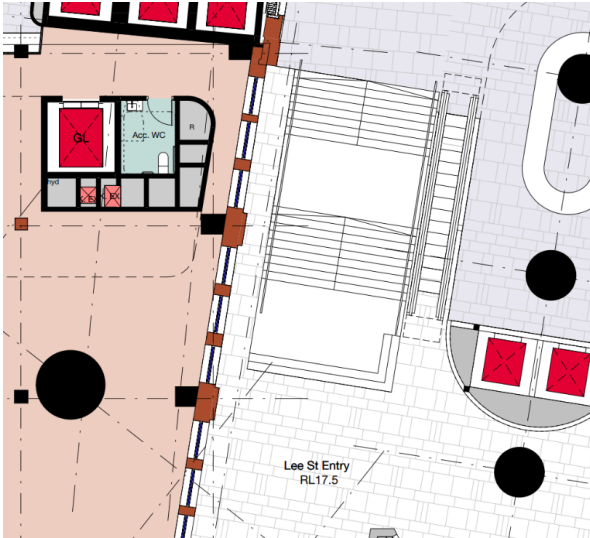


Figure 1 Approved ground floor plan

Source: Bates Smart

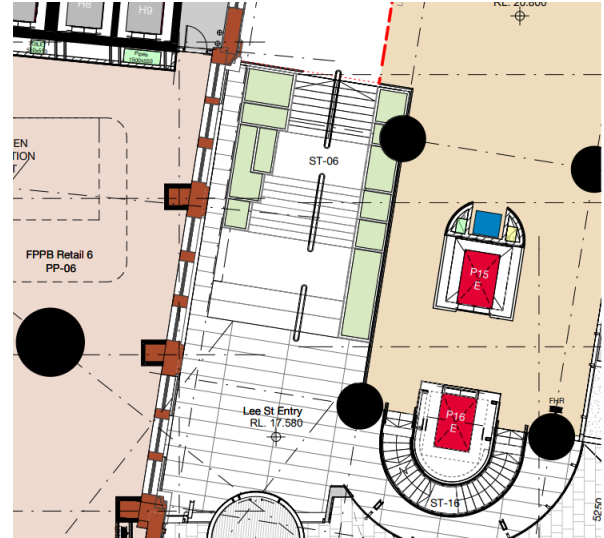


Figure 2 Modified ground floor plan.

Source: Bates Smart

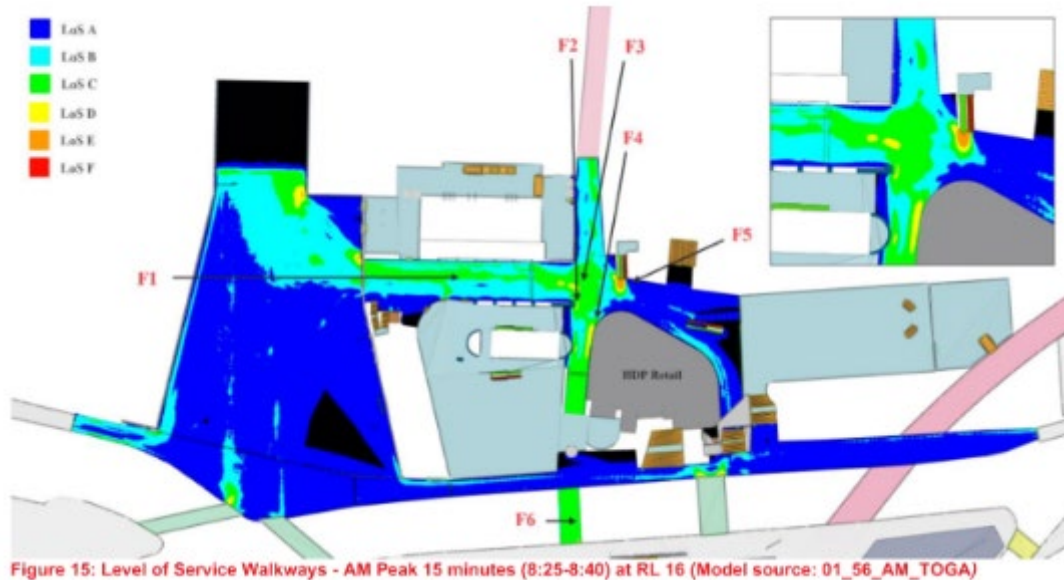
### South junction of brick retaining wall modified

**The City raises concern with the partial removal (and non-reinstatement) of the highly significant brick retaining wall on the site boundary. This would have a negative impact on a significant element of the heritage item**

Some heritage impacts are acknowledged; however, the demolition plans have been updated to indicate the limited extent to which the wall would be demolished and not reinstated. There are opportunities through interpretation to indicate the original extents of the wall.

Note that through investigations associated with the Atlassian site adjacent is has been found that this wall is at least already partly reconstructed. Some sandstone detailing has been replaced with the same foam that exists to the eastern façade of the Parcel Post building. The southern end of the brick wall would be reconstructed on a new alignment. While it would represent a departure from the original design, it would provide an opportunity to reinstate authentic 'noble' materials to the wall.

The below snapshot from the pedestrian modelling report shows the outcome of the pedestrian modelling which highlights the challenges with retaining the southern extend of the wall. The wall is in the vicinity of the area identified as F4 in the modelling. The model indicates that this area is at capacity. The outcome is caused by the use of the Link Zone and increased conflicting, multidirectional movements. The Pedestrian Modelling Report notes that unforeseen circumstances may result in significant delays congestion or performance failure and identified one of the mitigation measures to be planning for where access points and queuing may occur. The southern end of the wall has been identified to impede on pedestrian circulated and is therefore proposed to be removed.



## RESPONSE TO COMMENTS - HERITAGE NEW SOUTH WALES

It is noted that a larger proportion of original internal fabric is proposed for removal, broadly consisting of all structural elements between grids PB and PF. It is understood that the purpose of this amendment is to ensure that concrete structural elements are compliant with current Australian standards and fire safety code. The steel encased structural grid including floors and columns are identified as an element moderate significance in the Conservation Management Plan Adina Hotel (Former Parcels Post), 2 Lee Street, Haymarket (Urbis 2022) (CMP) for the building ...

... Heritage NSW recommends that the use of salvaged material from the steel encased structural grid is considered as a part of the Heritage Interpretation Strategy for the project, as this may provide an opportunity to realise the research potential of this element of the structure.

This is appropriate. The proponent is willing to address this comment as part of a revised condition of consent.

The proposed demolition plans identify areas for 're-construction', where parts of the structure are to be reconstructed from salvaged existing brick and stonework, and that there are numerous changes shown from approved plans which are not addressed by the HIS, in particular the eastern retaining wall and western lobby at the lower ground level and basement level 01. Additional commentary on the proposed approach to reuse of salvaged fabric, and justification for changes from the approved plans is requested to assist in understanding the requirement for these changes.

The intention is that salvaged fabric in areas noted for reconstruction is to be catalogued, stored and reinstated in the same location/reused to reconstruct the same element from which it was salvaged. Alternately to be used for necessary repairs elsewhere. The Salvage Plan which is a condition of the consent is under preparation and will include plans which confirm the reuse of the salvaged elements.



The majority of the reconstruction of the eastern retaining wall was part of the original approval. The demolition plans have been updated to indicate the limited extent to which the wall would be demolished and not reinstated. There are opportunities through interpretation to indicate the original extents of the wall.

Note that through investigations associated with the Atlassian site adjacent is has been found that this wall is at least already partly reconstructed. Some sandstone detailing has been replaced with the same foam that exists to the eastern façade of the Parcel Post building. The southern end of the brick wall would be reconstructed on a new alignment. While it would represent a departure from the original design, it would provide an opportunity to reinstate authentic 'noble' materials to the wall.

The below snapshot from the pedestrian modelling report shows the outcome of the pedestrian modelling which highlights the challenges with retaining the southern extend of the wall. The wall is in the vicinity of the area identified as F4 in the modelling. The model indicates that this area is at capacity. The outcome is caused by the use of the Link Zone and increased conflicting, multidirectional movements. The Pedestrian Modelling Report notes that unforeseen circumstances may result in significant delays congestion or performance failure and identified one of the mitigation measures to be planning for where access points and queuing may occur. The southern end of the wall has been identified to impede on pedestrian circulated and is therefore proposed to be removed.

The western entry would be partly reconstructed for buildability purposes. The extent of area for reconstruction is minor. The Temporary Protection Plan will indicate any require support of adjacent significant fabric.

**Archaeological advice provided by Urbis states that the changes to basement levels do not impact on the recommendations of the Historical Archaeological Impact Assessment which informed the original Environmental Impact Statement (EIS) for the project, and that its conclusions are unchanged. As it is understood that no expansion to the footprint of the basements is proposed, the amendments are acceptable from a heritage perspective.**

Noted.

**Numerous changes are proposed to the internal layout, including relocation of the hotel lobby into the fPPb, infill of approved voids in level 2 to level 6, relocation of plant rooms on level 2 to level 6, and relocation and reorientation of stairs and lifts. Generally, the HIS assesses these changes as either neutral or minor positive impacts, and the infill of voids is acknowledged to maintain a larger part of the original layout. Relocation of plant rooms will also make additional windows visible from the interior of the eastern facade, which is a positive impact. There are no additional heritage impacts identified from the proposed amendments to the internal layout.**

Noted.

**The number of columns in the southern pill is proposed to be altered from one row of four columns to three pairs of two columns, taking the total number of columns from four to six. The HIS provides some discussion of this, noting that the increase in spacing between the columns will improve views to the southern facade of the fPPb from some angles, while the introduction of a second row of columns will decrease the visibility of the facade from other angles. It is considered that this change will not significantly alter the visual impact of the project to the southern facade of the fPPb.**

Noted.

**It is noted that the proposed changes include reducing the size of the roof canopy in the north-eastern commercial lobby to create an external forecourt. It is acknowledged that this**

modification will provide greater visibility of this corner of the fPPb and is considered to have a positive visual impact in comparison with the approved proposal.

Noted.

The proposed changes include the removal of the southern section of a brick retaining wall in the eastern section of the site, which is identified as an element of high significance in the CMP. This will be replaced by a new section of wall with a modified shape.

The HIS recommends that in-ground treatment is employed as a part of interpretation to indicate the original location of the wall, and that any bricks from the wall should be salvaged for reuse elsewhere.

Given the significance of this element, Heritage NSW requests additional information regarding the justification for this change to the design and any alternatives considered in design development.

Some heritage impacts are acknowledged. There are opportunities through interpretation to indicate the original extents of the wall.

The below snapshot from the pedestrian modelling report shows the outcome of the pedestrian modelling which highlights the challenges which retaining the southern extend of the wall. The wall is in the vicinity of the area identified as F4 in the modelling. The model indicates that this area is at capacity. The outcome is caused by the use of the Link Zone and increased conflicting, multidirectional movements. The Pedestrian Modelling Report notes that unforeseen circumstances may result in significant delays congestion or performance failure and identified one of the mitigation measures to be planning for where access points and queuing may occur. The southern end of the wall has been identified to impede on pedestrian circulated and is therefore proposed to be removed.

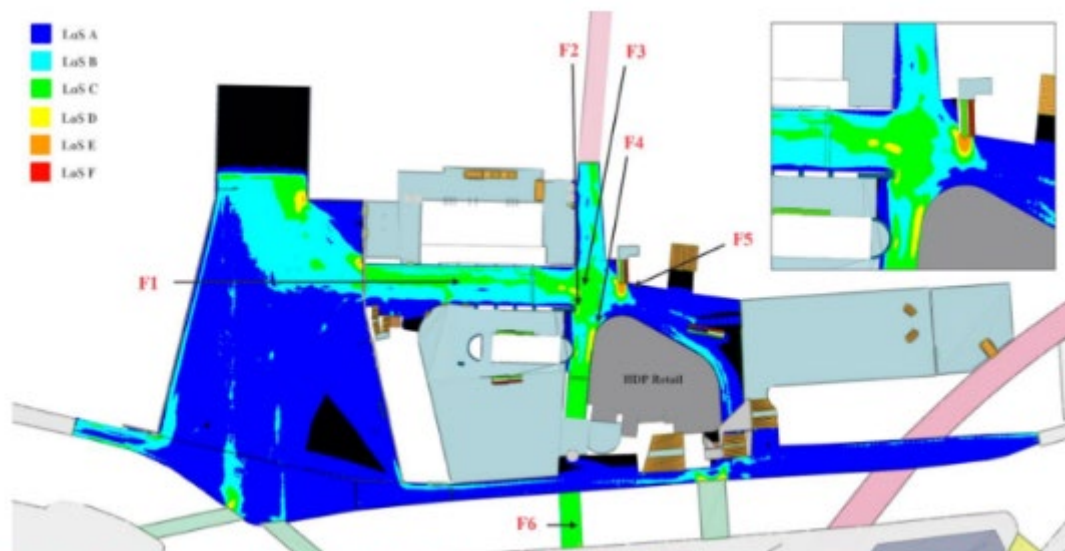
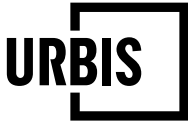


Figure 15: Level of Service Walkways - AM Peak 15 minutes (8:25-8:40) at RL 16 (Model source: 01\_56\_AM\_TOGA)

## RESPONSE TO COMMENTS - NATIONAL TRUST

The National Trust of Australia (NSW) previously lodged its formal objection to this proposal, based on the severe heritage impact that the proposal would have on a most important



building listed on the NSW State Heritage Register. The Trust of course notes that Development consent (SSD 33258337) was granted by the Department of Planning, Housing and Infrastructure (DPHI) on 2 February 2024, yet we remain totally dismayed that such an important building could be demolished to such an extent as has been proposed. Urbis Heritage to note National Trust submission and provide high level response to comments provided within a Heritage Response letter.

The Parcels Post Office Building, constructed in 1913 and designed by the NSW Government Architect is a key contributing item to this precinct. It is listed as an item of local heritage significance under Schedule 5 of the Sydney Local Environment Plan 2012, (Item 855) and is also included within the Central Railway Station State heritage listing (Sydney Terminal and Central Railway Stations Group, SHR 01255). We dispute the insinuation in the Design Report (Bates Smart, June 2024, p.3) that the Parcels Post building is “not however listed independently on the State Heritage Register” and is therefore somehow secondary in consideration with Central Station – it is an important part of this precinct.

The building was individually listed by the NSW National Trust in 1979. The Trust noted in its reasons for listing:

“This uncompromising design results in a building capable of competing with, and enhancing, the formidable area of Railway Square to the west and, to the north, agreeing particularly well in style and scale with Central Railway Station. These two buildings, with the enclosed park, planting and railings and the monumental Pitt Street colonnade beneath, form a particularly good and imposing example of Edwardian urban design.”

The Parcels Post building was specifically designed in response to its location as a building to be seen “in the round”. It is a sophisticated, sculptural, Mannerist design and makes an important contribution to its setting on all sides, and in its current state it responds to the Henry Dean Plaza and Railway Square in particular. These are important elements of its curtilage, and setting. The current proposal will relegate the Parcels Post building to a mere postage stamp at the base of this new tower.

The National Trust opposed the building of a tower over and above this important building. We disagreed with the earlier Heritage Impact Statement (prepared by Urbis, November 2020) which stated (p.1) “the proposed tower envelope is partly built over the heritage item and partly over the plaza to the south... this offset form of separation and suspension creates a physical and visual curtilage for the former Parcels Post building and enables the building and tower to be read independently, with the heritage item maintaining its prominence in the streetscape and views.” It is difficult to understand how an addition of over 200m which overhangs the building creates a positive visual and physical curtilage to this important building or allows it to maintain its prominence in the streetscape.

We note that the National Trust objects to the approved development.

The revised Heritage Impact Statement (Urbis, 2 July 2024) is equally concerning in its assessment in response to the guidelines relevant to heritage matters outlined in the Design Guide: Western Gateway Sub-precinct (prepared by Transport for New South Wales in September 2021). The National Trust cannot in any way support the conclusion in the Heritage Impact Statement (p.12) that “almost all interventions would generate a positive heritage outcome.”

The initial guidelines were very clear with regard to development on Block C. They stated that any development should:

**minimise adverse impacts to significant heritage fabric;**

**be designed to ensure treatment of tower cores and lobbies adjacent to the heritage item are to have regard to the original form and facades, allow for interpretation and minimise intervention to all facades.**

**Just as the Eastern Canopy in the proposal has been modified to allow for greater visibility of the northeast corner of the Parcels Post Building, the National Trust can see no reason that the proposed tower lift core could not be modified to allow for the retention of the original exterior – particularly the southeast corner.**

**The argument in the previous Heritage Impact Statement (p.1) that “the robust nature of the building” allows it to accommodate such an intrusion is not an argument the National Trust would support. It is indeed the robust and dignified qualities of this important building that the Trust seeks to maintain.**

We note that the National Trust objects to the location of the approved tower core. The location and scale of the approved tower core is not the subject of this modification application.

**As we noted in our previous submission, at the time of its construction, Sydney’s Central Station was, in the words of the Draft Strategic Vision, “inspired by the grand classical stations of Europe.”<sup>1</sup> The redevelopment of the site should also be influenced by the best of modern planning strategies and station redevelopments. The massive renewal of London’s Kings Cross St Pancras Station has been achieved without the need for multiple high-rise buildings, and the existing heritage buildings within the precinct have been carefully and thoughtfully remodelled and reinvigorated – without the need to add a tower on top. Even Tokyo Railway Station retains a dignified setting despite the development pressures of that city.**

We note that the National Trust objects to the approved tower. The introduction of a tower on the site is not the subject of this modification application.

**We hope that the redevelopment of Sydney’s Central Station can be a model of successful renewal on a scale that aligns with the important heritage buildings and connections of the place. The Trust supports the Preliminary Precinct Plan aims regarding Built Form and Heritage that the precinct should:**

**“Establish a context-responsive built form approach that achieves a balanced distribution of height, density and scale”**

**“Reinforce the iconic architecture of the Sydney Terminal building, former Parcels Post Office and Mortuary Station as important and defining character elements in the streetscape”**

**“Establish a sensitive built form response to heritage interfaces, including retaining a sufficient heritage curtilage and separation to potential future development and visual connections to key heritage items.”**

**“Ensure that any proposed built form does not reduce the amenity of existing public open space, particularly Prince Alfred Park”**

Noted. The fundamental scale and form of the development is not the subject of this modification application. This application is for minor alterations to the approved scheme which would generally result in a positive or neutral outcome, except as addressed in this document.

**The National Trust is of the opinion that this approved proposal is at odds with most of the expressed visions for the Central Precinct, in particular the aims to “establish a context-**

**responsive built form approach that achieves a balanced distribution of height, density and scale” and “reinforce the iconic architecture of the Sydney Terminal building, former Parcels Post Office and Mortuary Station as important and defining character elements in the streetscape.” Maintaining the view of the Parcels Post Building from the east by simply floating another building above it is not a good heritage outcome.**

We note that the National Trust objects to the approved development. The approved scheme is clearly in line with the Government’s ambitions for the Tech Central Precinct, has been subject to an extensive consultation process and multistage approval process which has resulted in an appropriate response to significant fabric. This application is for minor alterations to the approved scheme which would generally result in a positive or neutral outcome, except as addressed in this document.

## **HERITAGE IMPACT ASSESSMENT – ADDITIONAL WORKS**

None of the items at Basement 05-Basement Level 1 have any potential to have a heritage impact.

The additional elements proposed to change at lower ground floor within the fPPB are minor and within the WC areas. These minor changes would not have a detrimental heritage impact.

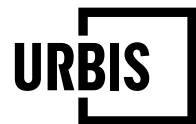
The changes at ground floor within the fPPB include the reconfiguration of the northeast plant room. The extents of the plant room would not change. The changes would be confined to the partition walls within the plantroom. This item would not have a detrimental heritage impact.

The changes at ground floor also includes changes to the risers around the western entry. These risers continue through the fPPB. The risers were included as part of the original modification application however the risers would be increased in depth.

This riser location was subject to significant workshopping to determine how the services could be effectively carried through the building while avoiding long ceiling mounted service runs. The amended modification drawings leave more of the eastern walls of the western entry (and the walls above this on the upper floor) when viewed from inside the main volume of each floor. The original presentation and volume would be retained from inside the western entry.

Some impact is acknowledged due to the removal of some understanding of the western entry vestibule from the ground floor and obscuring from original walls on the upper floor. However, it is appreciated that this solution best allows for minimising visual impacts arising from long runs of ceiling mounted services (which would further be operationally inefficient) which would be necessary given the required venting of the services behind the western façade at roof level. Alternate solutions such as running services through the central atrium were investigated however these would have a more notable visual impact on the quality of the space. This approach was agreed to be the preferred from a heritage and operational perspective.

None of the amendments above the fPPB or within the new pill structures have potential to have any detrimental heritage impacts.



## **CONCLUSION**

Please do not hesitate to contact the below if you require any additional information.

Kind regards,

A handwritten signature in black ink that reads "Allie Cornish". The signature is written in a cursive, flowing style.

Allie Cornish  
Associate Director  
+61 2 8233 7624  
acornish@urbis.com.au