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Mr David Glasgow Principal Planning Officer **Key Sites Assessments** Department of Planning, Industry & Environment 4 Parramatta Square PARRAMATTA NSW 2150

By email: David.Glasgow@planning.nsw.gov.au

Dear David,

RE: New Request for Advice - Atlassian Office and Hotel Development (SSD-10405) **Central Precinct – Response to Submissions** 

Thank you for your request for advice from the Heritage Council of NSW on the Supplementary Response to Submissions (RTS) report for this SSD within the State Heritage Register listed Sydney Terminal Rail and Central Railway Station Group (email 9 August 2021).

Heritage NSW appreciates the opportunity to consult closely with DPIE and the applicant on this major project application collegiately, within the concept of the broader city-shaping Central technology hub activation by Government.

Our response to the latest RTS stage follows, and either reflects or expands on key heritage matters that have been previously raised. We trust this assists the Department finalising its approval to drive available public heritage outcomes.

## General

We are pleased that the following suggestions in our 14 July 2021 response, including heritage interpretation and Designing with Country improvements, have been incorporated.

Recommendation: The Heritage Council, Heritage NSW and City of Sydney are to be consulted as part of the ongoing detailed design development of the project's heritage interpretation to ensure there is a consistent and coherent approach for this critical component of the project.

Recommendation: The project's heritage interpretation should communicate and strengthen the strong visual and historic connection between the former Inwards Parcel Shed and the former Parcels Post Office building, as well as the connection and function between the Shed and Platform 1. The heritage Interpretation is to be considered across the whole SHR site, including integration with the two other blocks within the Western Gateway sub-precinct, as well as the broader Central Railway Station SHR site.

Recommendation: The project's heritage interpretation is to be developed to the satisfaction of the Heritage Council or its delegates.

Recommendation: The Heritage Council and Heritage NSW are to be consulted as part of the detailed design development of the Designing with Country framework to ensure there is a consistent and coherent approach for this critical component of the project.

Recommendation: A Temporary Protection Plan for the site is to be developed to the satisfaction of the Heritage Council or its delegate.

## Former Inwards Parcels Shed

 In terms of legibility of the adapted former Inwards Parcel Shed, we provided a clear and strong recommendation to remove or significantly re-scale the proposed green roof. As stated in the supplementary RTS report, the applicant has suggested this component is subject to further design development in consultation with the Heritage Council/Heritage NSW.

Whilst we support the approach for further design development, this should be undertaken to the satisfaction of the Heritage Council as per the below recommendation. This is to ensure maximum readability of the former Inwards Parcel Shed structure and to mitigate the impacts to its structure, industrial landscape setting and aesthetic appearance from the new tower. Therefore, I reiterate our previous recommendation.

Recommendation: The green roof component of the works to be substantially modified to minimise impacts to the industrial character of the site, its setting and the shed. This is to be undertaken to the satisfaction of the Heritage Council.

As also outlined in our previous response, it is critical that as much of the Shed's significant fabric as possible is retained to ensure visual evidence to the former use and function of the place are maintained, as part of the overall SSD redevelopment outcomes. I reiterate that further detail is still required to clearly demonstrate how the reuse of the demolished fabric will be incorporated and used appropriately. In addition, how it will be determined what significant elements will and will not be salvaged and the reason for their inclusion/exclusion.

The supplementary RTS states that a "comprehensive plan package" is being prepared to identify each item of fabric and the intended work to it (retention, replacement, modification etc). The Heritage Council welcomes this approach and its future review.

Recommendation: Further detail and designs are required to understand what elements will and won't be salvaged, and how this is determined, and how they will be reused. This should be undertaken in consultation with, and to the satisfaction of, the Heritage Council or its delegate.

## Other Environmental matters

- As with the fabric of the former Inwards Parcel Shed, further detail is still required to clearly demonstrate how the reuse of the demolished fabric around the site will be incorporated and used appropriately.
- There is still unresolved detail on the impacts/use to the components below. Therefore, the proposed "comprehensive plan package" should be expanded to include the detailed proposals for the following.
  - Lower Carriage Lane retaining wall for temporary construction access and a new large arched opening
  - All the awnings along Lower Carriage Lane for temporary construction access and a new large arched opening

- Modifications to surface levels to provide a ramp to the Upper Carriage Way
- Sandstone plinths and corbels, iron vent grates

Recommendation: The proposed "comprehensive plan package" is a positive approach and should be expanded to provide further information on the impacts/use of these components, including any significant adverse changes and impacts to its structure, form, industrial landscape setting and aesthetic. This is to be undertaken in consultation with, and to the satisfaction of the Heritage Council or its delegate, and the City of Sydney.

I refer to the rationale for changes to facilitate a large new opening within the Lower Carriage Lane wall (Ambulance Avenue), which is based on the proposed "Central Walk" main pedestrian thoroughfare, following Cabinet support. The Heritage Council notes the transport and planning drivers for this opening and supports in principle the necessary changes to the current brick openings. However, we strongly recognise the need to retain the existing heritage character of the setting and the heritage experience for pedestrians.

We note that the scale of the proposed opening has been driven by project requirements and not heritage impacts. Importantly, the justification for the scale of change and intervention on this key heritage element is based on pedestrian modelling that <u>may</u> eventuate in 35 years' time. Whilst we understand the need to build-in future capacity needs for this access, speculative scale responses should not adversely impact the SHR site's existing heritage character, values and the experience of the space.

Noting advice that recovery and re-use of the historic brickwork is limited due to the strong mortar matrix, the Heritage Council would support a design that references the current heritage form and character of the wall. We would support formal consideration by Transport for NSW on compromise options such as a twin-arch/single pillar configuration if safety and industry constraints enable.

Recommendation: DPIE conclude options' discussion for a modified opening form with TforNSW. Any approved changes to facilitate the Central Walk retain design input from the Heritage Council or its delegate, and the City of Sydney, to deliver a better heritage character outcome than the current proposed intervention.

• The supplementary RTS states that the proposed inclusion of large landscaping along the northern side of the former Parcel's Post Office building (facing the proposed future Third Square) will have no visual impacts on the building and its significant façade, or the setting of the place. My positions on this component is unchanged and I disagree with the RTS assessment – it will have a visual impact on the building and its significant façade and its setting. Therefore, I reiterate our previous recommendation to ensure the landscaped design does not further compromise the industrial aesthetic of the place.

Recommendation: The proposed large landscaping along the northern side of the former Parcel's Post Office building (facing the proposed future Third Square) is to be removed.

## Historical Archaeology

The RTS report has advised that early archaeological testing was not undertaken using the S60 approval pathway. It is now anticipated to do testing as part of early works. We note that that the draft ARD by Urbis and supplied with the RTS report has limited methodology for only 2 test trenches and very limited Research Questions. Heritage NSW is also concerned that potential State significant archaeology has been predicted (related the Benevolent Asylum, 1819-1901) yet the ARD states

'The day to day management of the archaeological testing program will be by the Secondary Excavation Director. However, as the potential archaeological resource will meet the threshold

for state significance, the Primary Excavation Director (ED), will attend the site to ensure that the integrity and significance of the archaeological remains are not compromised.' (p28)

This is not in accordance with the Conditions of Heritage Council permits, where the Primary Excavation Director should be responsible for all archaeological works, and would usually be expected to be present at the site for the entirety of the works.

Heritage NSW also notes that the Draft ARD by Urbis is only intended to cover the limited testing proposed and that Urbis has recommended by DPIE that the testing should be Conditioned as part of any approval. We note there is a separate Former Inwards Parcels Office Historical Archaeological Assessment and Research Design for open-area historical archaeological excavation, prepared by AMBS, which includes a detailed research design and excavation strategy for the salvage of State significant archaeology if it survives at the site. We recommend that compliance with both of the Research Designs, and with usual Heritage Council practice, should be Conditioned if the project is approved. We would be happy to provide more advice about CoA if that would assist DPIE.

It is noted that the overall project will be subject to further development of the detailed design. We strongly recommend ongoing consultation and input from the Heritage Council and Heritage NSW during this process.

If you have any queries regarding the above matter, please contact me on 0419 648 933 or tim.smith@environment.nsw.gov.au.

Yours sincerely

Tim Smith OAM

Director Operations Heritage NSW

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20/8/21