



Mr Thomas Piovesan
Department of Planning & Environment
Level 18
12 Darcy Street
PARRAMATTA NSW 2150

By: Major Projects Portal

Dear Mr Piovesan

# Western Gateway Block C - TOGA Central - SSD 33258337 - Heritage Council of NSW Referral Advice

Thank you for your referral dated 26 August 2022 inviting comments from the Heritage Council of NSW on the above State Significant Development (SSD).

It is understood that the Environmental Impact Statement (EIS) proposal seeks consent for the conservation, refurbishment and adaptive reuse of the former Parcels Post Office building, construction of a 45 storey tower above and adjacent to the existing building and public domain improvements across the site (Block C).

The Western Gateway Block C TOGA Central encompasses the former Parcels Post Office (former Adina Hotel) and Henry Deane Plaza. The former Parcels Post Office forms part of the State Heritage Register (SHR) listed Sydney Terminal Rail and Central Railway Stations Group (SHR 01255). The former Parcels Post Office is of historic significance for its association with the development of Central Station and connections with the NSW rail and postal services in the early 1900s.

The Heritage Council of NSW has considered the information on public exhibition and provide the following comments for consideration.

We support the renewal of Central Precinct and Western Gateway sub-precinct to expand and revitalise Central Station to successfully deliver economic, social and environmental benefit to the community. We are supportive of the NSW Government's commitment to deliver Tech Central that will provide up to 250,000 sqm of space for technology companies. This includes 50,000 sqm for start-ups and scaleups in connected locations brimming with heritage, culture and activity.

We acknowledge the context of Block C in the Western Gateway sub-precinct and Central Precinct Renewal Program and find the proposal to be generally acceptable from a heritage perspective given the approved rezoning and the associated changes in height, scale, character and setting within the sub-precinct.

Although our preference is for the new tower to be freestanding and the cantilevered component to be externally supported, we acknowledge the site constraints and structural engineering design limitations have ultimately shaped the design outcome.

We support the interior and exterior schedule of conservation works to the former Parcels Post Office building as detailed in the documents prepared by Urbis and Apex Diagnostics.

### **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.

### **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.

#### 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.

#### **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.

### **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.

## **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.

If you have any queries regarding the above matter, please contact Tim Smith OAM, Director Assessments at Heritage NSW via email <a href="mailto:tim.smith@environment.nsw.gov.au">tim.smith@environment.nsw.gov.au</a>.

Yours sincerely

Frank Howarth AM PSM

**Chair, Heritage Council of NSW** 

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16 September 2022