

Mr Thomas Piovesan
Senior Planning Officer
Industry Key Sites
Department of Planning and Environment
PO BOX 404
PARRAMATTA NSW 2124

By: Major Projects Portal

Dear Mr Piovesan

Western Gateway Block C – TOGA Central – SSD 33258337 – Response to Submissions (RtS) – Referral Advice

Thank you for your referral dated 10 January 2023 inviting comments from the Heritage Council of NSW on the above State Significant Development (SSD) Response to Submissions (RtS). We appreciate the continued opportunity to comment on this development.

The RtS package have sufficiently addressed the Environmental Impact Statement (EIS) comments provided by the Heritage Council of NSW dated 16 September 2022. It is understood the overall project is subject to further detailed design development. We reiterate our recommendation for ongoing consultation and input from the Heritage Council of NSW and Heritage NSW during this process.

We highly encourage TOGA to continue collaboration with the neighbouring stakeholders for Block A, Block B and Central Station in the further development and coordination of the precinct-wide heritage interpretation, ground plane activation and public domain.

Recommended Draft Conditions of Approval have been provided in **Attachment A**. Comments relating to Aboriginal Cultural Heritage regulation matters have been separately provided.

If you have any questions regarding the above advice, please contact Chrisia Ang, Major Projects, Senior Assessments Officer, at Heritage NSW on (02) 8275 1952 or Chrisia.Ang@environment.nsw.gov.au.

Yours sincerely

Rochelle Johnston

Rochelle Johnston
Senior Manager, Major Projects
Heritage NSW
Department of Planning & Environment
As Delegate of the Heritage Council of NSW
24 January 2023

ATTACHMENT A: RECOMMENDED DRAFT CONDITIONS OF APPROVAL

Heritage Consultant

1. A suitably qualified and experienced heritage consultant is to be commissioned in consultation with Heritage NSW to work with the consultant team throughout the design development, contract documentation and construction stages of the project. The heritage consultant is to be involved in the resolution of all matters where existing significant fabric and spaces are to be subject to preservation, restoration, reconstruction, adaptive reuse, recording and demolition (in accordance with the *Burra Charter*). The heritage consultant is to be provided with full access to the site and authorised by the applicant to respond directly to relevant authorities where information or clarification is required regarding the resolution of heritage issues throughout the project.
2. No work, including demolition, shall commence until evidence and details of the commission on the above terms are to be provided to Heritage NSW and Council.
3. Following engagement of the heritage consultant in accordance with Condition 1, throughout the documentation, demolition and construction stages of the approved works the experienced heritage consultant is to:
 - (a) prepare reports as required by this consent;
 - (b) undertake regular site inspections;
 - (c) maintain a diary of site inspections that includes photographs of the works, details of heritage advice and decisions arising out of each inspection and any further physical evidence uncovered during the works;
 - (d) compile a final report, including the diary, verifying how the heritage conditions have been satisfied, and the works completed in accordance with the Conservation Management Plan; and
 - (e) upon completion submit a copy of the final report to Heritage NSW and Council.

Heritage Induction

4. The site induction is to include a heritage component prepared by the nominated heritage consultation. The heritage component is to convey the history, significance and listing of the former Parcels Post Office Building and obligations of all tradespeople working on site.
5. Prior to the issue of a construction certificate, the applicant must submit to Heritage NSW the content of the heritage induction.

Demolition and Dismantling of Heritage Fabric Methodology

6. No work shall commence on the demolition and dismantling of the heritage item, until a final detailed Demolition and Dismantling of Heritage Fabric Methodology (DDHFM) for the demolition and dismantling of the heritage item is prepared by a suitably qualified and experienced heritage practitioner and submitted to and approved by the Planning Secretary. The DDHFM must be prepared in consultation with and endorsed by Heritage NSW prior to works commencing. It must include (but shall not be limited to):
 - (a) detailed engineering and heritage assessment(s) to determine the methodology for the demolition and dismantling process of the existing

eastern façade to the former Parcels Post Office Building and the south-east corner, with input from a suitably qualified and experienced heritage specialist and/or a heritage engineer for sensitive demolition and dismantling works and with reference to the:

- i. 'Heritage Impact Statement Revision A' prepared by Urbis dated 1 August 2022 as amended by the 'Heritage Impact Statement Revision C' prepared by Urbis dated 13 December 2022; and
 - ii. 'Conservation Management Plan 05' prepared by Urbis Pty Ltd and dated 24 November 2022.
- (b) consideration of the heritage fabric to be retained in-situ including method of retention, protection and structural support throughout the construction process;
- (c) detailed consideration of the impact and mitigation measures required to avoid and minimise impacts of the demolition and dismantling process of heritage fabric;
- (d) details regarding the safe storage of the retained fabric identified for salvage; and
- (e) All work to significant fabric, shall be carried out by suitably qualified tradespersons with practical experience in dismantling and conserving similar heritage structures, materials and construction methods.

Temporary Protection Plan

7. No work shall commence on the demolition and dismantling of the heritage item, until a Temporary Heritage Protection Plan (THPP) is prepared by a suitably qualified and experienced heritage practitioner and submitted to and approved by the Planning Secretary. The THPP must:
- (a) be prepared in consultation with, and endorsed by, Heritage NSW;
 - (b) include protection systems to ensure significant historic fabric is not damaged or removed, potential impacts due to vibration are minimised, and traffic is appropriately managed during the works;
 - (c) ensure the monitoring and repair of any damage of significant items as a result of construction and include inspection before, during and after completion of the works;
 - (d) provide a protection strategy for the duration of the construction works detailing how the proposed works will ensure that the heritage building is to be suitably protected and stabilised during the construction process including from any construction waste, dust, damp, water runoff, vibration or structural disturbance or damage, including:
 - i. details of temporary hydraulic drainage works to ensure that all water both in ground and above ground is channelled to the street and that no such water is channelled onto the adjacent property fabric or interiors;
 - ii. construction debris on neighbouring properties, in drainage lines or in cavities between the boundary walls of the adjacent buildings, is to be removed progressively as the works progress;
 - iii. a geotechnical report detailing the investigation of the location and depth of footings of the adjacent buildings. This report should address

details of lateral ground movement, advice of any additional boundary offsets that may be required as a result of the location of footings and on the suitability of structural engineer's proposals for underpinning or other support to adjacent footings; and

- iv. details of the proposed protection of party walls from damp and water ingress during the works.

Photographic Archival Recording

8. A photographic archival recording of the former Parcels Post Office Building and all associated heritage fabric is to be prepared by a suitably qualified and experienced heritage practitioner. The recording is to be in digital form, prepared in accordance with the Heritage NSW's guidelines titled 'Photographic Recording of Heritage Items using Film or Digital Capture'. Copies of the record are to be submitted to Heritage NSW and Council. The record is to be prepared subject to the following procedure:

- (a) the archival documentation, and the number and type of selected enlarged photographs required will be determined by the significance and quality of the building or structure;
- (b) the form of recording is to be a photographic documentation of the site and its context, and the exteriors and interiors of the existing building(s) photographed, where appropriate, using a camera/lens capable of 'perspective correction'.
- (c) the digital form of the recording is to be as follows:
 - i. the Development Application number and the Condition of Consent number must be noted;
 - ii. include a summary report detailing the project description, date and authorship of the photographic record, method of documentation and limitations of the photographic record;
 - iii. the electronic images are to be taken with a minimum 8 megapixel camera, saved as JPEG TIFF or PDF files with a size of approximately 4-6MB, and cross referenced to the digital catalogue sheets and base plans. Choose only images that are necessary to document the process, and avoid duplicate images;
 - iv. include written confirmation, issued with the authority of both the applicant and the photographer that Heritage NSW and Council is granted a perpetual non-exclusive licence to make use of the copyright in all images supplied, including the right to make copies available to third parties as though they were Council images. The signatures of both the applicant and the photographer must be included; and
 - v. the report can be submitted on a USB, or web transfer, in PDF/A format (created directly from the digital original), with a digital catalogue of images with the following data for each: location, image subject/description and data photograph taken.

9. As significant fabric may remain concealed and only be exposed during works, further archival recording is to be undertaken in stages, as considered appropriate by the conservation architect commissioned for the project, but must include:

- (a) Prior to the removal of any significant building fabric or furnishings from site;

- (b) During the removal of fabric on site that exposes significant building fabric or furnishings; and
- (c) On the completion of works.

The staged and final archival recordings are to be prepared according to the procedure outlined in Condition 8 (a-c) and copies are to be submitted to Heritage NSW and Council.

Heritage Interpretation Plan

10. A comprehensive Heritage Interpretation Plan (HIP) that acknowledges the heritage of the site must be prepared and submitted to and approved by the Planning Secretary. The HIP must:

- (a) be prepared by a suitably qualified and experienced heritage practitioner in consultation with the Heritage Council of NSW (or its delegate) and Council;
- (b) be coordinated with the heritage interpretation approach for the entire Western Gateway Sub-Precinct;
- (c) communicate and strengthen the strong visual and historic connection of the former Parcels Post Office Building and the broader Central Precinct;
- (d) consider opportunities to incorporate the results of any site-specific archaeological finds / outcomes;
- (e) incorporate interpretive information, information on the history and significance of the site, the location, type, making materials and contents of the interpretation being proposed.

Note: The HIP must be implemented prior to the issue of any occupation certificate.

- 11. The recommendations of the HIP are to be implemented in conjunction with the proposed development.
- 12. Prior to occupation and commencement of use, the Applicant must provide evidence to the Certifier that the Heritage Interpretation Plan has been implemented in accordance with Condition 10 and Condition 11.

Designing with Country

13. Prior to the issue of a construction certificate, a final Designing with Country Framework (DCF) that acknowledges Aboriginal cultural heritage must be submitted to and approved by the Planning Secretary. The DCF must:

- (a) be prepared by a suitably qualified and experienced heritage practitioner in consultation with the Heritage Council of NSW (or its delegate), Council, the DIP and registered Aboriginal parties;
- (b) consider GANSW's Connecting with Country Framework November 2020; and
- (c) consider opportunities to incorporate the results of any site specific Aboriginal archaeological finds / outcomes.

Non-Aboriginal Archaeology – Unexpected Finds Protocol

- 14. If any unexpected archaeological relics are uncovered during the work, then all works must cease immediately in that area and the Heritage NSW contacted. Depending on the possible significance of the relics, an archaeological assessment

and management strategy may be required before further works can continue in that area. Works may only recommence with the written approval of the Heritage NSW.

Non-Aboriginal Archaeology – Heritage Induction

15. Prior to the commencement of works, the applicant must ensure that the nominated Excavation Director delivers an archaeological induction to all relevant construction personnel. The archaeological induction should include:
- (a) heritage obligations of all project personnel;
 - (b) how to identify archaeological relics of State or local significance;
 - (c) what to do in the event potential relics are uncovered; and
 - (d) unexpected finds protocol.

Heritage Asset Maintenance Plan

16. Prior to the issue of any occupation certificate, the Applicant must prepare a costed Heritage Asset Maintenance Plan (HAMP) to ensure the continued protection of heritage significance of the heritage item and to guide the future maintenance on heritage fabric. The HAMP must:
- (a) be prepared in consultation with, and be endorsed by, Heritage NSW;
 - (b) be based on Heritage NSW's publication: 'Preparing a maintenance plan', and is to be a guide for the effective, continuous, protective maintenance of all significant heritage fabric for a minimum period of 20 years;
 - (c) include all fabric identified as being of heritage significance, specification notes and methodologies based on the Articles of the Australian ICOMOS Burra Charter 2013 and best conservation practise, and a list of appropriate consultants and suppliers together with the projected costing for each item of work.