

15 September 2016

Mr Michael Rowe  
JBA  
173 Sussex Street  
SYDNEY NSW 2000

Our Ref: 13-0055A mrl2S96

**Re: One Carrington Street Project Section 96 Application—Heritage Impact Assessment**

Dear Mr Rowe

We refer to the current Section 96 application to modify the current Development Application (DA) for the proposed One Carrington Street development. The scope of the modifications includes changes to the approved scope of works to Shell House at 2-12 Carrington Street. Shell House is listed as a heritage item on Schedule 5 of Sydney Local Environmental Plan 2012 (Sydney LEP 2012).

This letter provides an assessment of the potential impacts of the proposed modifications on the heritage significance of the building, any other heritage items in the vicinity, and considers whether the revised works could adversely affect the historical and Aboriginal archaeological potential of the development site. The letter also makes recommendations where appropriate for mitigation measures to address any additional heritage impacts arising out of the proposed works comprising the Section 96 application.

The content of this letter is limited to consideration of the of the potential heritage impacts of the proposed modifications to the April 2014 DA, as amended by the previous Section 96 application, approved in August 2016. The assessments and recommendations in regard to these modifications should be read in conjunction with the heritage reports prepared for the previous development approvals. These reports are:

1. One Carrington Street—Heritage Impact Statement (HIS) (GML Heritage, May 2014); and,
2. One Carrington Street—Archaeological Assessment and Impact Statement (AAIS) (GML Heritage, March 2014).
3. One Carrington Street Project Section 96 Application—Heritage Impact Assessment (GML Heritage, November 2015)

**Background**

In March 2014 GML Heritage Pty Ltd (GML) was commissioned by Sovereign Wynyard Centre Pty Limited and its nominee 'Brookfield' to prepare a Heritage

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Impact Statement (HIS) for the proposed development known as One Carrington Street, Sydney. The development includes the demolition of the Menzies Hotel, 14 Carrington Street, and 301 George Street (formerly referred to as Thakral House); construction of a new commercial office tower; and works to two heritage buildings—the former Shell House, 2–12 Carrington Street, and Beneficial House, 285 George Street.

The project had received Concept Plan approval (No. MP09\_0076) in April 2012, but excluded 285 George Street. The applicant was Thakral Holdings Group. The Concept Plan approval was subsequently modified by the addition of 285 George Street. A HIS (One Carrington Street–Heritage Impact Statement, GML Heritage, May 2014) was prepared to satisfy the DGRs. An archaeological assessment (One Carrington Street–Archaeological Assessment and Impact Statement, GML Heritage, March 2014), including Aboriginal and non-Aboriginal archaeology, was also prepared as a separate report. Conservation Management Plans (CMPs) for Shell House (HBO + EMTB, September 2005) and 285–287 George Street (Graham Brooks and Associates, April 2004) had been prepared previously, and provided the conservation policy basis for assessing the heritage impacts of the redevelopment.

A subsequent Section 96 application was approved in August 2016, which varied the scope of work to both Shell House and 285 George Street (Beneficial House), which is also listed as a heritage item on Schedule 5 of Sydney LEP 2012.

### **Scope of Section 96 Modifications**

The original Concept Plan approval of April 2014 allowed for the complete demolition of the internal reinforced concrete structure of Shell House at all levels, including the structure supporting the clock tower. The previous Section 96 approval of reduced the extent of demolition, retaining one structural bay of the internal structure behind the Carrington Street, Margaret Street and Wynyard Lane facades, as well as the structure supporting the clock tower.

The revised scope of works proposed under the current Section 96 application reverts to that proposed under the original approved Concept Plan i.e. complete demolition of the internal structure of Shell House at all levels, including the structure supporting the clock tower. It is understood that detailed analysis of the existing structure, including coring and material testing, has confirmed that the structural integrity of the reinforced concrete floors has been seriously affected by chlorides leaching from the magnesite toppings. It is proposed therefore to demolish and replace the existing internal structure. Temporary bracing and scaffolding will need to be introduced to support the Shell House facades and clock tower throughout the demolition and reconstruction phases.

### **Heritage Impact Assessment**

The interiors of Shell House are highly modified, with little original fabric remaining, and consequently they do not contribute greatly to its heritage significance. The structure was assessed as being of Moderate significance in the 2010 Conservation Management Plan.

Removing the original structure of Shell House would have some adverse impact on the building's heritage significance, as it will be reduced to a facade. However, given that the interior structure is of only Moderate significance, and new internal structure will be inserted which will approximate the existing floor to floor levels and retain a functional relationship to the original window openings, this impact would be acceptable.

The demolition of the internal reinforced concrete structure of Shell House will pose some risks for the retained glazed terra cotta façades and clock tower, and temporary new structure will need to be introduced to support these elements during the demolition phase of the project. To mitigate these risks, it is critical that the condition of the facade be fully understood and the methodology for its retention and protection be worked out in detail to ensure that it will not suffer damage during the demolition and construction works.

### **Heritage Items in the Vicinity**

The scope of works to Shell House proposed under the Section 96 application is restricted to the internal fabric of Shell House. There will be no additional impacts on any other heritage items in the vicinity, including Wynyard Station, Wynyard Park and Lisgar House.

### **Historical Archaeology**

The 2014 AAIS identified that the sites of the former Shell House and Beneficial House have the potential to contain deep subsurface historical archaeological features from the second phase of the site occupation (1850–1920s). The scope of works to Shell House proposed under the Section 96 application will not result in any additional impacts on the historical archaeological potential of the site.

### **Aboriginal Heritage**

The 2014 AAIS identified that the site has low potential to contain evidence of Aboriginal occupation of the site, in the form of stone objects. The scope of works to Shell House proposed under the Section 96 application would not result in additional impacts on any evidence of Aboriginal occupation extant within the site.

### **Conclusions and Recommendations**

In summary, the revised scope of works proposed under the current Section 96 application is acceptable in heritage terms, but it will be necessary to apply a range of mitigation measures to manage those adverse impacts that will result from the modifications, and to implement the opportunities for enhanced heritage outcomes, particularly in regard to interpretation and the conservation of significant/original fabric. These measures are derived from those included in the 2014 HIS, amended as required to address the proposed modified scope of works (refer to Attachment A).

In particular, it is essential that the risks of adverse impacts to the retained terra cotta façade and clock tower of Shell House are appropriately managed to ensure that these elements it will not suffer damage during the demolition and construction works. Measures to address these concerns are set out as Recommendations 2.2 and 2.5 in Attachment A.

The potential historical and Aboriginal archaeological impacts arising from the scope of works proposed under the Section 96 application are unchanged from the current approved Section 96 DA. These can be mitigated by archaeological monitoring during demolition works, which is in line with the recommendations proposed in the 2014 AAIS.

Please do not hesitate to contact me if you have any queries about the above.

**Yours sincerely**  
**GML Heritage Pty Ltd**

A handwritten signature in black ink, appearing to read 'Peter Romey', written in a cursive style.

**Peter Romey**  
**Partner**

## ATTACHMENT A

### Recommendations

#### 1.0 Generally

- 1.1 Detailed design of the One Carrington Street development should ensure that relevant heritage conditions of the Concept Plan Approval Schedule 3, as well as any heritage requirements of subsequent approvals are met.
- 1.2 A photographic archival recording should be prepared of the former Shell House, Beneficial House and the Wynyard Station pedestrian tunnels (including the Hunter Connection) prior to works commencing. The archival recording should be prepared in accordance with the NSW Heritage Council guidelines *Photographic Recording Of Heritage Items Using Film or Digital Capture*, 2006. The archival recording should be updated following demolition of the Menzies Hotel and 301 George Street, as well as the interiors of the former Shell House and Beneficial House, to record any original fabric or details revealed during the works.
- 1.3 Interpretation of the history of the subject site should be incorporated into the proposed development. The interpretation should include the history of the site as part of the military parade ground and subsequent subdivision, the development of Shell House as the Shell Oil Company's Australian headquarters, the planning and construction of Wynyard Station and arcades, and the development of Beneficial House as Peapes Menswear store. Recommendations for interpretation are provided below.
- 1.4 Specialist heritage advice should be incorporated into the detailed design and construction phases to guide works to the former Shell House (in accordance with Policy 5 of the 2005 CMP) and Beneficial House.
- 1.5 Construction works should avoid physical impacts on heritage items in the vicinity, including Lisgar House and Wynyard Park. Lisgar House should be protected during construction works and its condition monitored.

#### 2.0 Former Shell House

- 2.1 The conservation policies in the 2005 CMP should be used to guide the detailed design of works to the former Shell House.
- 2.2 Prior to the commencement of works, the condition of the glazed terra cotta facade should be fully documented and a detailed methodology for its monitoring and protection during construction be developed to ensure that it will not suffer damage during the demolition and construction works.
- 2.3 Detailed design for the reinstated Carrington Street entrance should be undertaken during the design development stage. Advice from a heritage specialist with expertise in working with glazed terracotta should be sought in designing or selecting the new entry door and framing.

- 2.4 The conservation and repair of the original steel framed windows in the former Shell House proposed for retention, and the fabrication of identical windows to replace missing ones, should be supervised by experienced conservation specialists. Advice from a heritage specialist with expertise in working with glazed terracotta should be sought in detailing the insertion of the new windows.
- 2.5 A detailed condition assessment and schedule of conservation works should be prepared for the glazed terracotta facade of the former Shell House, including the clock tower, in accordance with Policy 14 of the 2005 CMP. The assessment and schedule should be prepared by a suitably qualified materials expert with extensive experience in the repair and conservation of this material. Conservation works to the glazed terracotta facade should also be guided by this expertise.
- 2.6 Expert advice sought for the clock in the former Shell House should be retained to guide the conservation and repair works to the clock. The clock should be put back in working order and adaptation to a digital master clock would be appropriate. The original mechanism should be retained, conserved and interpreted.
- 2.7 The photographic archival recording of the former Shell House should include the turntable in the basement and the early truck lift in the Menzies Hotel building.