

27 September 2016

Mr Michael Rowe  
JBA  
173 Sussex Street  
SYDNEY NSW 2000

Our Ref: 13-0055A mrl3S96

**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 modifications proposed in the recent S96 application (lodged in September, 2016) have also been considered.

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, 10 November 2015)
4. One Carrington Street Project Section 96 Application—Heritage Impact

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**GML Heritage Pty Ltd**

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Assessment (GML Heritage, 15 September 2016)

## **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 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 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.

A subsequent S96 application (lodged in September, 2016) proposes further modifications to the approved scope of work for Shell House. The proposed modifications included the complete demolition of the internal reinforced concrete structure of Shell House at all levels, including the structure supporting the clock tower, as approved under the original Concept Plan approval of April 2014.

## **Scope of Section 96 Modifications**

The scope of modifications proposed for Shell house under the current S96 application comprises:

- The alteration of the existing ground floor window on the splay at the corner of Carrington Street and Margaret Street to create a new entry doorway proposed under the August 2016 Section 96 approval has been deleted.
- New entrances to provide direct at grade access to the lobby space are proposed on the Carrington Street frontage, which will require the alteration of 3 existing and original windows.
- Conversion of an existing basement window at the western end of the Margaret Street frontage into a pair of doors for access to the fire hydrant and booster set.
- On the Carrington Street frontage, the previously proposed individual retail units at the Carrington Street level have been deleted to create a single volume lobby and activated retail space, accessed from the proposed three new entrance doors.
- New floors will be constructed throughout Shell House, but the new levels will not replicate the original Shell House floor levels proposed for removal under the September 2016 S96 application.

The new floors will align more closely with those of the new main tower to provide greater connectivity between the two buildings. The new floor levels will however generally maintain a consistent relationship with the existing window openings, typically with the window head approximately 2.3m above the new floor level, although minor variations to this arrangement will occur on some levels.

- The new main core to Shell House will be relocated closer to the Wynyard Lane frontage to the east, to allow for larger open floorplates when combined with the tower floors. At the typical floor levels, the previously proposed toilets and plant rooms against the Wynyard Lane external wall of Shell House are relocated and replaced with an access corridor.
- The relocation of the new main core to Shell House to the east will allow for the roof terrace below the clock tower on level 12 to be reinstated.
- The original columns supporting the clock tower columns, proposed for removal under the September 2016 S96 application, will be replaced with a transfer beam system at Level 12, as originally proposed. Some demolition and construction of new steel framing within the clock tower is now also required to support and strengthen the clock tower in accordance with contemporary engineering standards.

### **Heritage Impact Assessment**

The scope of external modifications proposed for Shell House under the current S96 application is limited to alterations to the existing ground floor windows on the Carrington Street frontage.

The 3 windows proposed for removal are original steel framed elements with arched top panes, dating from 1938. The windows are separated from the original steel framed basement windows by trachyte voussoirs, which will also need to be removed to create the new door openings into the lobby. The southernmost window has previously been converted into a doorway to access a retail tenancy, but 7 out of the original 8 windows on the main Carrington Street façade are intact.

The removal of these original windows and sections of trachyte will result in some adverse impact on the heritage significance of Shell House, particularly as these elements are highly visible at street level and are key detail elements of the original Spain and Cosh design. However, the 4 original windows to the Carrington Street façade north of the original main entry will be retained and conserved, as will the 6 original windows on the Margaret Street façade. The window on the splay at the corner of Carrington Street and Margaret Street, proposed for removal and conversion as an entry doorway under the September 2016 S96 application, will also now be retained and conserved.

Overall, from a heritage perspective, retention and conservation of all of these original windows and trachyte voussoirs would be the preferred outcome. However, the fact that 11 windows in a continuous line will be retained, and the 3 windows to be removed are (along with the southernmost window already converted into a doorway) grouped to the south of the original main entry and so will appear as a conscious design statement, will mitigate the adverse heritage impact to a level that is acceptable.

It will be important however to ensure that the detail design of the new doorways, including the removal of the original trachyte voussoirs, is undertaken with due consideration of the stylistic and material principles of the original windows. Although the new doorways will inevitably be perceived as new elements, with careful attention to detail they will at least be compatible rather than intrusive in their relationship to the retained original windows.

The existing basement window at the western end of the Margaret Street frontage to be replaced with a pair of doors for access to the fire hydrant and booster set is currently a non-original single pane of glass in an aluminium frame. The new doors will be glazed with a steel frame of a pattern to match the retained original windows. The alteration will not result in any adverse heritage impacts on Shell House.

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.

Although the proposed new floors will not replicate the original Shell House floor levels, they will nevertheless generally maintain a consistent relationship with the existing window openings, with minor variations to this arrangement on some levels. The windows will continue to function as such for the proposed commercial office use of Shell House, and the modification therefore will not result in any adverse heritage impacts on Shell House.

The creation of a large single volume lobby space accessed at grade from Carrington Street, moving the roof terrace to below the clock tower on level 12, the introduction of a transfer beam system at Level 12 and the partial removal and construction of new steel framing within the clock tower will not result in any adverse impacts on the heritage significance of Shell House. The proposed relocation of the new main core to the east will result in a positive heritage outcome as it replaces the previously proposed toilets and plant rooms against the Wynyard Lane external wall of Shell House with an access corridor, allowing for greater activation behind these windows.

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

Except for the alterations to the existing ground floor windows on the Carrington Street frontage, 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 detail design of the new doorways proposed to replace the 3 original steel framed windows dating from 1938 on the Carrington Street frontage (and the southernmost window already converted into a door), including the removal of the original trachyte voussoirs, is carefully undertaken with due consideration of the stylistic and material principles of the original windows. Measures to address these concerns are set out as Recommendation 2.9 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**



**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 of Shell House, including the clock tower, should be fully documented and a detailed scope of work for their repair and (where necessary) replacement prepared and implemented.
- 2.3 A detailed methodology for the monitoring and protection of the retained façade and clock tower should be prepared and implemented to ensure that these elements will not suffer damage during the demolition and construction works.
- 2.4 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.

- 2.5 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.
- 2.6 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.
- 2.7 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.
- 2.8 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.
- 2.9 The detail design of the new doorways proposed to replace the 3 original steel framed windows dating from 1938 on the Carrington Street frontage (and the southernmost window already converted into a door), including the removal of the original trachyte voussoirs, should consider, and be compatible with, the stylistic and material principles of the original windows.