

30 November 2020

2190140

Mr Jim Betts
Secretary
Department of Planning, Industry and Environment
12 Darcy Street
PARRAMATTA NSW 2150

Attention: Amy Watson (Team Leader, Key Sites Assessments)

Dear Amy,

**SECTION 4.55(1A) MODIFICATION APPLICATION
BAYS 5-15, LOCOMOTIVE WORKSHOP, SOUTH EVELEIGH (SSD 8449)**

This application has been prepared by Ethos Urban on behalf of Mirvac Projects Pty Ltd (Mircvac), pursuant to Section 4.55(1A) of the *Environmental Planning and Assessment Act 1979* (EP&A Act) to modify Development Consent SSD 8449 which relates to Bays 5-15 of the Locomotive Workshops, South Eveleigh (the site).

The purpose of this modification request is to seek approval to dismantle and repurpose a timber and steel mezzanine platform located within Bay 15 South.

This application identifies the consent, describes the proposed modifications and provides an assessment of the relevant matters contained in Section 4.55(1A) of the EP&A Act.

It is accompanied by:

- amended Architectural Plans, prepared by Sissons Architects (**Attachment A**);
- a Heritage Impact Statement prepared by Curio Projects (**Attachment B**);
- an extensive assessment of each of the potential development options (**Attachment C**);
- an evaluation of likely leasing implications, prepared by Cook Wish Ellison (**Attachment D**);
- valuation advice prepared by CIVAS (NSW) Pty Ltd (**Attachment E**);
- an Economic Viability Analysis Report, prepared by Mirvac (**Attachment F**); and
- Letter from Post Op the Bay 14 tenant (**Attachment G**).

1.0 Background to the Development Consent

Development Consent (SSD 8517 and SSD 8499) was granted by the Independent Planning Commission (IPC) on 22 February 2019 for the adaptive reuse of the existing Locomotive Workshops at South Eveleigh (formerly known as the Australian Technology Park (ATP)).

SSD 8517 relates to the adaptive reuse of Locomotive Workshops (Bays 1-4a), including:

- a maximum of 11,607m² GFA for uses including retail premises, function centre, educational establishment, information and education facility, artisan food and drink industry, general industrial (retention of the Blacksmith) and recreation facility (indoor);
- a loading dock and travelator;
- associated heritage conservation works; and
- public domain works, external illumination and signage.

SSD 8449, the subject of this application, relates to the adaptive reuse of Locomotive Workshops (Bays 5-15), including:

- a maximum of 27,458m² GFA for commercial premises including 156m² for retail uses;
- associated heritage conservation works; and
- external illumination and signage.

To date, nine (9) modifications to SSD 8449 have been approved since February 2019, which are summarised below in **Table 1**.

Table 1 Modifications to SSD 8449

Modification #	Approved	Description
Modification 1	10/09/2019	Modification to Condition B25 (Stormwater and Drainage).
Modification 2	29/05/2019	Deletion of Condition D6.
Modification 3	02/08/2019	Minor amendments to the location and configuration of service pods (containing lift cores and building services) in Bays 5-13.
Modification 4	19/02/2020	Minor amendments to the internal design and layout of commercial tenancies on the Ground Floor and Level 1 of Bays 5-13 of the Locomotive Workshop.
Modification 5	20/11/2019	Installation of additional skylights above Bays 5-15 of the Locomotive Workshop.
Modification 6	05/02/2020	Modification to the Conditions of Consent (Parts B and E) to enable staged Occupation Certificates to be issued and the use of frosted replacement glazing in existing heritage arched windows.
Modification 7	09/06/2020	Modification for internal design and layout changes of Bay 15 of the Locomotive Workshop.
Modification 8	Withdrawn	-
Modification 9	02/09/2020	Minor amendments to the internal design and layout of commercial tenancies on the Ground Floor and Level 1 of Bays 5-13 of the Locomotive Workshop.
Modification 10	02/09/2020	Installation of photovoltaic panels across the roof of the Locomotive Workshops (Bays 5-15)

2.0 Proposed Modifications to the Consent

The proposed modifications to SSD 8449 are described in the following sections.

2.1 Modifications to the Development

The proposed modifications to Development Consent SSD 8449 comprise:

- the removal of the Bay 15 South mezzanine platform and the use of the removed heritage fabric for interpretation purposes; and
- the insertion of a condition of consent that requires the development of a detailed interpretive design that is consistent with the overarching approved Stage 2 Interpretation Strategy for the Locomotive Workshops.

2.2 Modifications to Approved Plans

The removal of the existing First Floor of Bay 15 of the Locomotive Workshop was approved under the original SSD 8449 (refer to **Figure 1** and **Figure 2**).

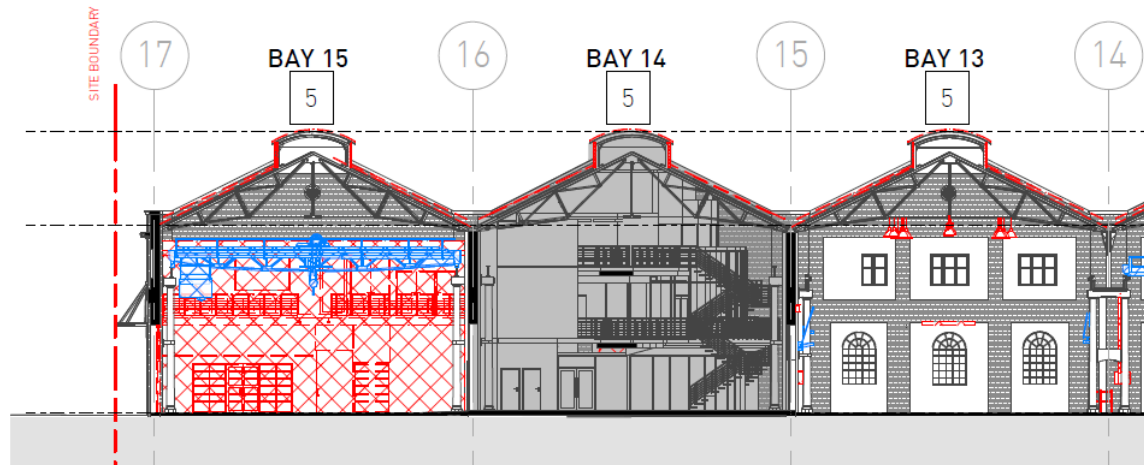


Figure 1 Approved Demolition Sections (SA-AR-DWG-BB-B4-0226 Rev M)

Source: Sissons Architects

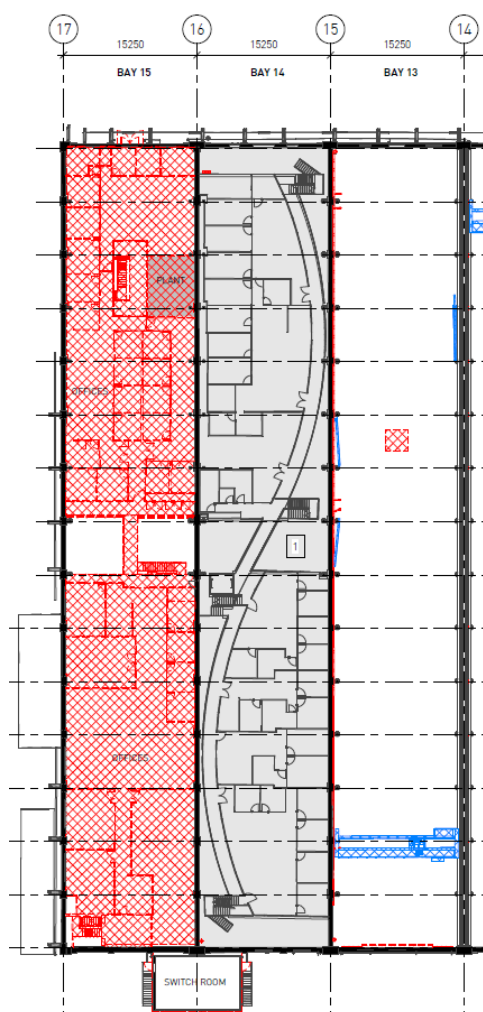


Figure 2 Approved Demolition Plan – First Floor (SA-AR-DWG-BB-B4-0211 Rev N)

Source: Sissons Architects

As discussed in Section 3 and illustrated in the amended demolition plans (Ref: SA-AR-DWG-BB-B4-0210 Rev T and SA-AR-DWG-BB-B4-0211 Rev T) and the additional Bay 15 demolition plans (Ref: SK_0942 Rev A and SK_0943 Rev A) included at **Attachment A, Figure 3** and **Figure 4**, the extent of the Bay 15 mezzanine platform does not go beyond the area that was originally approved to be demolished within Bay 15 South.

The proposed demolition works therefore include:

- dismantling the steel platform columns at Ground Floor level;
- dismantling the steel and timber mezzanine platform at First Floor level;
- dismantling of any other associated fabric.

The southwest corner of Bay 15, including the retained brick wall and potential hoist/lift structure, will remain in-situ and will be celebrated within the new architecture of the building.

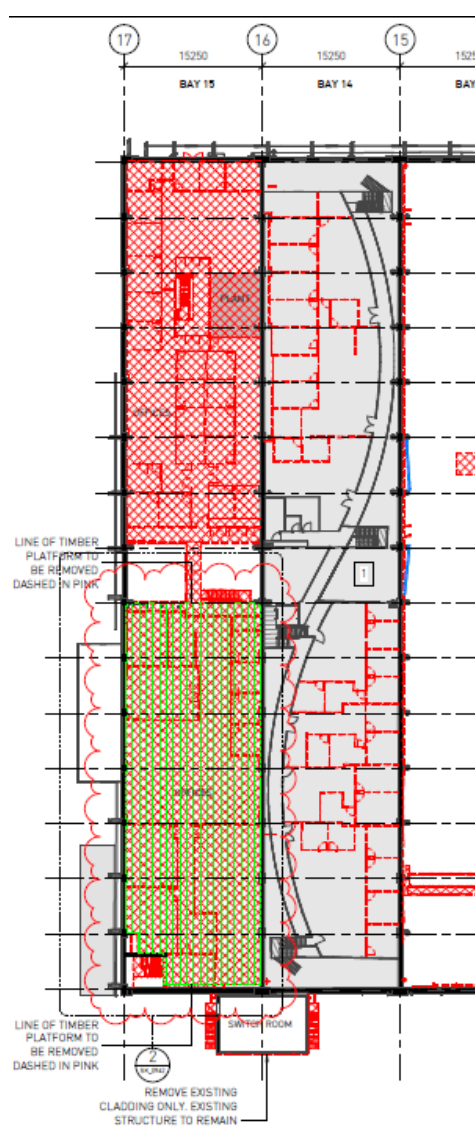


Figure 3 Proposed Demolition Plan – First Floor (SA-AR-DWG-BB-B4-0211 Rev T)

Source: Sissions Architects

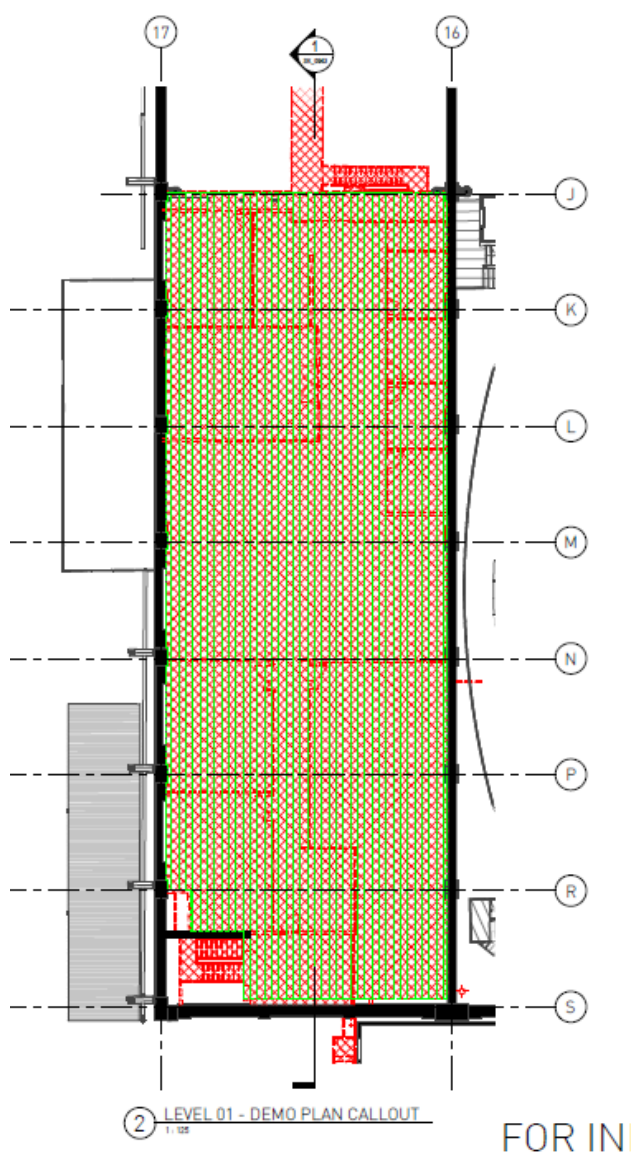


Figure 4 Extract of the Bay 15 demolition plan, illustrating the extent of the heritage platform

Source: Sissons Architects

2.3 Modifications to Conditions

The proposed modifications described above necessitate amendments to the consent conditions which are identified below. Words proposed to be deleted are shown in ~~bold strike through~~ and words to be inserted are shown in ***bold italics***.

2.3.1 Condition A2 – Proposed Amended Condition

A2 Terms of Consent

Drawing No.	Rev	Name of Plan	Date
SA-AR-DWG-BB-B4-0210	N 7	Existing and Demolition Plan – Ground Floor	15/05/18 26/11/20
SA-AR-DWG-BB-B4-0211	N 7	Existing and Demolition Plan – First Floor	15/05/18 26/11/20
<i>SK_0942</i>	<i>A</i>	<i>Bay 15 South Timber Platform – Demolition Plans</i>	<i>26/11/20</i>
<i>SK_0943</i>	<i>A</i>	<i>Bay 15 South Timber Platform – Demolition Section</i>	<i>26/11/20</i>

2.3.2 Heritage Interpretation – Proposed New Condition

As set out within Section 2.1 and 2.2 and justified in Section 3, Mirvac intends to dismantle an existing mezzanine platform within Bay 15 South and adaptively reuse the fabric for interpretation purposes. Until the mezzanine platform has been removed, and the volume of useable fabric is known, Mirvac will not be able to determine the detailed interpretation design.

Accordingly, Mirvac request that the following condition of consent is included within the Instrument of Approval.

HERITAGE INTERPRETATION

B38A Within three months of the removal of the Bay 15 South mezzanine platform, the Applicant shall prepare and submit a detailed interpretive design for the use of the Bay 15 South mezzanine platform fabric to the Planning Secretary. The detailed interpretive design shall be prepared in consultation with the City of Sydney Council and Heritage NSW and in accordance with the Stage 2 Heritage Interpretation Plan and the Heritage Impact Statement, prepared by Curio Projects dated 9 November 2020 that accompanies Modification 11 to SSD 8449.

The detailed interpretive design shall also ensure that southwest corner of Bay 15, including the retained brick wall and potential hoist/lift structure, shall remain in-situ and will be celebrated within the new architecture of the building.

3.0 Justification for the Proposed Amendments

The justification for the proposed amendments to SSD 8449 as set out in Sections 2.1 and 2.3 is provided below.

3.1 Background to the Bay 15 South Mezzanine find

In the initial stages of the demolition works within Bay 15 which included the demolition of the 1990s fit-out fabric, (as approved under SSD 8449 and in accordance with the approved demolition plans), Curio Projects (Curio) and Mirvac identified that there was potential for an historic structure to be present yet encased within the modern fabric, within Bay 15 South.

As outlined in detail within the Heritage Impact Statement prepared by Curio (refer to Section 5) and included at **Attachment B**, following the finding, exploratory works were undertaken to identify the extent and condition of the potential structure.

The exploratory works revealed the presence of an intact timber and steel mezzanine platform in overall good condition which spanned the southern half of Bay 15, along with a brick pit and adjacent brick wall that was located in the south west corner of the Bay, as illustrated in **Figure 5**.

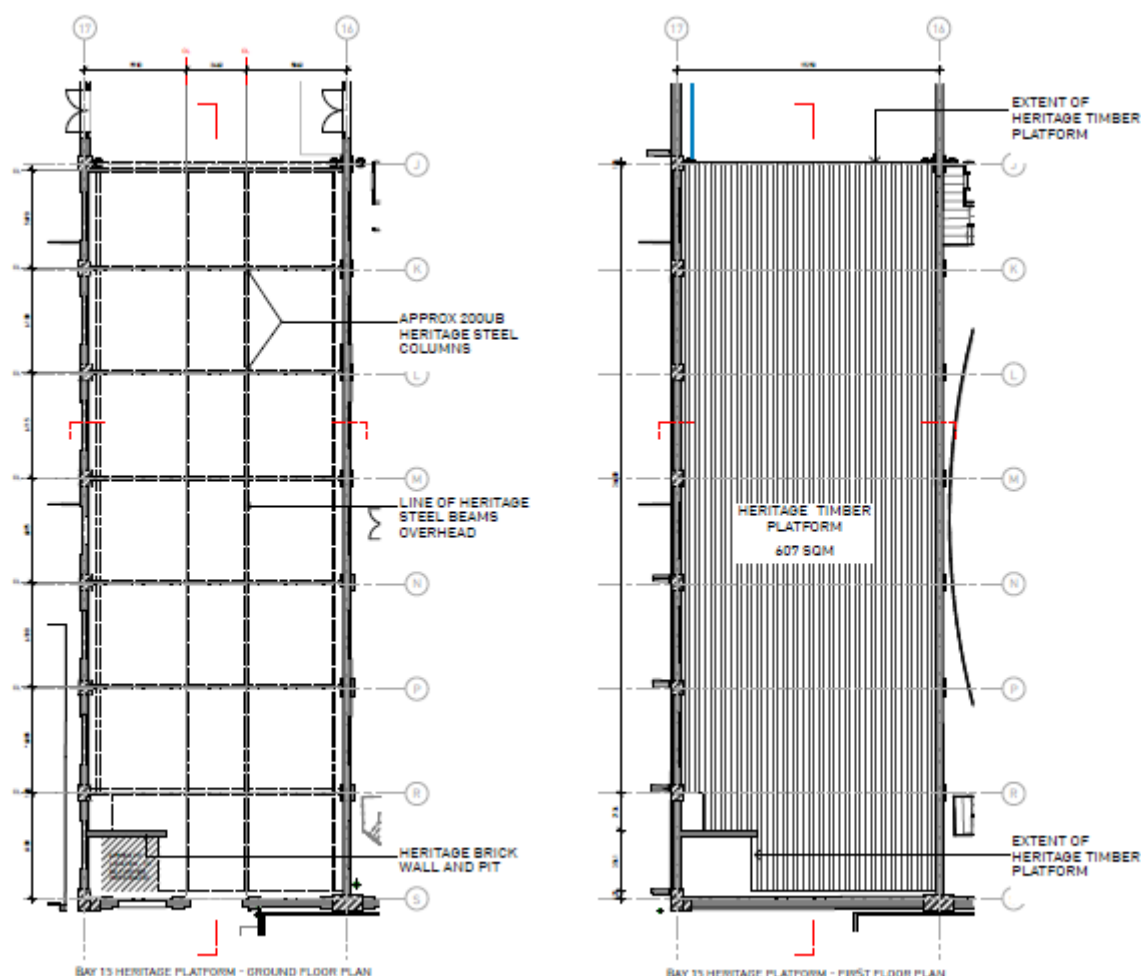


Figure 5 Ground Floor and Level 1 Plans of Bay 15 South illustrating the extent of the mezzanine platform and location of the brick pit and adjacent brick wall

Source: *Sissons Architects*

Following the complete revelation of the structure, the exposed fabric was generally intact with very few modern penetrations along the timber floorboards. The exposed fabric comprised:

- A mezzanine platform mainly composed of typical 1940s building fabric, with minor additional later modifications especially at the south west area. The mezzanine platform is composed of timber floorboards, timber and steel beams and steel supporting columns that divide the Bay 15 south into two levels;
- Large steel supporting columns and steel beams distributed uniformly and visible from the ground floor space. They support the 1940s timber floorboards that compose the floor structure of the mezzanine platform level;
- A brick pit and brick wall in the southwest corner that were potentially used as a lift/ hoist structure;
- A timber and steel structure at the top of the southwest brick wall above the mezzanine platform, also potentially related to the lift/hoist mechanism to lift heavy items for the Locomotive Store;

- Maker's stamps (Kembla and BHP) and dimension marks visible on the steel supporting columns;
- Pipes associated with the Locomotive Workshop use along the east and west brick wall;
- Two exposed steel wing brackets attached to steel columns on a north-south orientation along the central spine supporting steel columns;
- Flat steel plates, steel rods and round steel through bolts against the original brick walls (east and west) sides at various locations;
- Sandstone blocks that sit on top of the brick wall and support the steel trusses on the mezzanine platform level;
- Steel and glass windows along the western wall of Bay 15 South, visible from the ground level and the façade; and
- Timber windows on the western wall of Bay 15 South on the mezzanine platform level.

The existence of the Bay 15 South mezzanine platform was mentioned in the *Eveleigh Railway Yards Locomotive Workshops Conservation Management Plan*, prepared by the Heritage Group, NSW Public Works 1995. However, the latest NSW Heritage Council endorsed Conservation Management Plan (CMP) prepared by GML in 2013, did not identify the Bay 15 South mezzanine platform that was encased within the modern fabric.

As a result, it was not listed in the physical fabric analysis for Bay 15 and was considered to have been removed as part of the 1990s redevelopment for the Site. Accordingly, the three-level proposal for Bay 15 as approved under SSD 8449 did not consider the existence of the 1940's structure hidden by the 1990s office fit out.

Nevertheless, Curio has prepared an Assessment of Significance of the Bay 15 South mezzanine platform based on the principles and definitions previously contained in *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance* and the NSW Heritage Manual, prepared by the former Heritage Branch, NSW Office of Environment and Heritage.

In summary Curio has considered that:

"The Bay 15 Mezzanine Platform is considered to meet the threshold of having local significance for its historical, aesthetic and representative values, but does not meet the threshold for significance at the State level. The platform was constructed at a later date (c1940s) for general utilitarian purposes (i.e. additional storage) using the standard materials and construction techniques for industrial mezzanines of the time. After consultation with key stakeholders, including the Australian Historical Railway Association, the local community and Former Workers, the Bay 15 South Mezzanine Platform has not been identified as having any specific intangible heritage values, in terms of social and associative significance at either a local or State level."

3.2 Assessment of development options

In response to finding the Bay 15 South mezzanine platform and the other associated structures, Mirvac undertook an exercise to analyse different architectural and engineering solutions in order to assess the best option in terms of viability of the project, heritage impacts and functionality for future tenants. Given the mezzanine platform was located between the proposed levels 1 and 2, as illustrated in **Figure 6**, the following four options were then assessed in terms of positives and negatives:

- Option 1 - Retain the platform in its original location
- Option 2 - Partially remove a portion of the mezzanine
- Option 3 - Relocate the mezzanine platform (raise it or lower it)
- Option 4 - Dismantle and repurpose fabric for interpretation

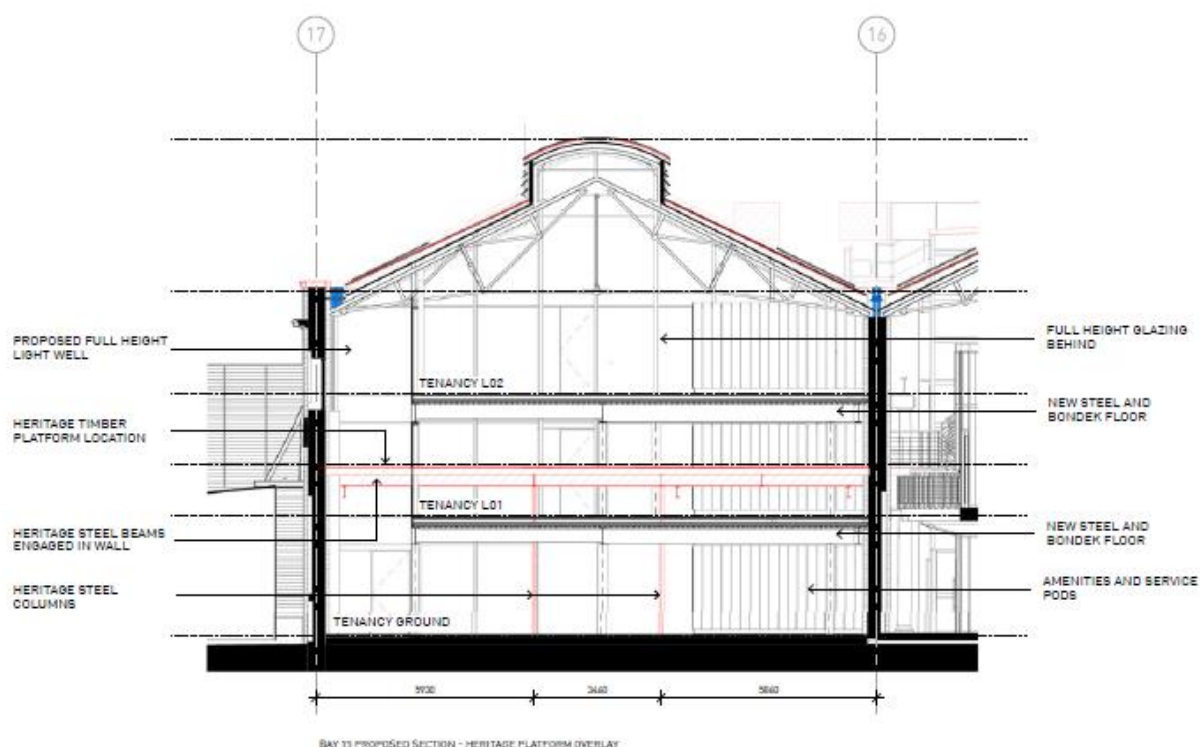


Figure 6 Section plan through Bay 15 South illustrating the location of the mezzanine platform in the context of the proposed floor levels that have been approved

Source: Sisson Architects

The extensive assessment of each of the options are included at **Attachment C**, which is supplemented by an evaluation of likely leasing implications if either whole or part of the mezzanine platform is retained, prepared by Cook Wish Ellison (**Attachment D**) and valuation advice prepared by CIVAS (NSW) Pty Ltd (**Attachment E**). The key findings of the assessments and advice confirm that:

- The mezzanine platform as it currently exists does not comply with the current BCA or Fire Engineering requirements. As Bay 15 is one fire compartment and more than 2 storeys in height, in order to comply with the BCA and Fire Engineering requirements, a two-hour fire rated wall would need to be constructed between the north and south of Bay 15. Alternatively, all the structural elements of the existing mezzanine platform (columns and beams) would need to be fire rated with thick intumescent paint if a firewall does not separate the north and south.
- If the mezzanine platform is to be retained, structural analysis and testing of materials would need to be undertaken to ensure that the existing structure is viable according to current standards. Preliminary investigations have indicated that the existing footings will not take an additional 2 levels, and therefore if the mezzanine platform is to be relocated as per Option 3 and additional floors are to be inserted as approved, additional footings and columns will also be required to be inserted, which may create significant physical and visual impacts.
- The retention of the mezzanine platform in its current location or relocated position would mean that it can be retained in its original location from a heritage perspective, but in order to fire rate the floor and top of the steel beams and columns, it would need to be disassembled and up to 30% of the material is estimated to be lost.

- If the mezzanine platform is to be retained as per Option 1, there would be a lack of natural daylight provided to the Ground Floor level and there would be lost opportunities for scale and volume appreciation at the Bay 15 entry as well as views through the tenancy. The northern and southern floor levels would also be on different levels, and a redesign of the stairs and bridge would need to be undertaken. Additional columns that may be required in Options 1, 2 and 3 would also impact the floor layout and visually complicate the views from the Bay 15 entrance and central spine and therefore the architectural vision for Bay 15 would be compromised.
- If the mezzanine platform is retained in its current position, the potential lack of natural light penetrating to the ground level other than two windows on the western wall, would render the ground floor level unleaseable for commercial office purposes. If there was interest in this area, the space would likely take longer (up to 24 months) to lease and be more ancillary than core office space, which would therefore equate to a lower market rent.
- The current location of the mezzanine platform is not contiguous with office levels in Bay 14 and therefore would prevent the two bays from being co-joined into one interconnected space in the future.
- The reuse and interpretation of the mezzanine platform fabric within the common areas of the space will have appeal in the marketplace.
- If Mirvac are required to retain the entire mezzanine platform or partially retain it, this would result in a loss of the total capitalised value and would incur additional design and construction costs equating to a total loss of between \$9.3 and \$10.7 million.

Accordingly, as set out clearly within the Economic Viability Analysis Report (**Attachment F**), Mirvac determined that in considering all of the potential impacts, constraints and opportunities, determined that Option 4 was its preferred and most viable option for the future of Bay 15 South.

3.3 Consultation with Heritage NSW and City of Sydney Council

The four assessed options for the Bay 15 South mezzanine platform were presented and issued to Heritage NSW and the City of Sydney Council on 23rd July 2020. At the meeting, Mirvac outlined that its preferred option was Option 4 – the removal and repurpose of the fabric for interpretation. A dismantling methodology (as explained within Section 7.2 of the Heritage Impact Assessment at **Attachment A**) was also presented.

On 20th August 2020 the Heritage NSW officer provided preliminary support via email for the dismantling the platform, conditioning its approval to the development of a detailed interpretive design solution consistent with the overarching interpretation strategy (refer to Appendix A of the Heritage Impact Assessment).

In addition, the City of Sydney Council also confirmed (via email on 18th August 2020) that it did not have any objections to Option 4 (refer to Appendix B of the Heritage Impact Assessment).

3.4 Consultation with neighbouring tenants

Mirvac has consulted with Post Op Group, the tenant situated within Bay 14. Post Op Group has not raised any issues with the proposed removal of the mezzanine platform, but has provided a letter (**Attachment G**) which requests that the Department assess and resolve the proposed modification application in a timely manner to ensure that the construction works can be completed as soon as possible.

3.5 Conclusion

In conclusion, the proposed amendments to SSD 8449 which seek approval for the removal of the Bay 15 South mezzanine platform and the use of the removed heritage fabric to be used for interpretation purposes are justified on the basis that:

- the Bay 15 South Mezzanine Platform has not been identified as having any specific intangible heritage values, in terms of social and associative significance at either a local or State level;
- the assessment of four options has determined that Option 4 – the removal and repurpose of the fabric for interpretation is the most viable option; and
- preliminary support has been provided by Heritage NSW and the City of Sydney Council and neighbouring tenants.

4.0 Substantially the Same Development

Section 4.55(1A) of the EP&A Act states that a consent authority may modify a development consent if *“it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all)”*.

The development, as proposed to be modified, is substantially the same development as that originally approved in that it:

- will not substantially alter the approved use or the external structure of the Locomotive Workshop, with the proposed modifications limited to the dismantling and repurposing of the Bay 15 south mezzanine platform fabric;
- will not substantially alter the internal heritage character of the Locomotive Workshop, with the detailed interpretive design to be prepared in consultation with the City of Sydney Council and the Heritage NSW and in accordance with the Stage 2 Heritage Interpretation Plan and the Heritage Impact Statement included at **Attachment B**;
- will not alter the approved gross floor area of the development;
- will not alter the key benefits of the adaptive reuse of the Locomotive Workshop, namely the creation of employment opportunities near the CBD and public transport, provision of heritage interpretation experiences, improved public access to a state listed heritage building and an enhanced public domain;
- does not alter the approved development's compliance with the applicable environmental planning instruments and policies; and
- does not result in any significant environmental impacts beyond those considered and determined to be acceptable by granting Development Consent to SSD 8449, as discussed further in **Section 5** below.

The Department of Planning, Industry and Environment may therefore be satisfied that the development consent, as proposed to be modified, will remain substantially the same as the original development consent, with the proposed modifications representing only a minor amendment to the scope of the already approved development. The proposed modification of Development Consent SSD 8449 may therefore be lawfully approved under Section 4.55(1A) of the EP&A Act.

5.0 Environmental Assessment

Section 4.55(1A) of the EP&A Act states that a consent authority may modify a development consent if “*it is satisfied that the proposed modification is of minimal environmental impact*”. Under Section 4.55(3) the consent Authority must also take into consideration the relevant matters to the application referred to in Section 4.15(1) of the EP&A Act and the reasons given by the consent authority for the grant of the original consent.

The following assessment considers the relevant matters under Section 4.15(1) and demonstrates that the development, as proposed to be modified, will be of minimal environmental impact.

5.1 Reasons Given for Granting Consent

The Statement of Reasons for Decision issued by the IPC noted that “*the impacts of the development are acceptable and can be appropriately mitigated through the implementation of the recommended conditions of consent*”. The Commission also recognised that the approved development was in the public interest, as it will result in a range of public benefits, including:

- employment opportunities near the CBD and public transport;
- improved public access to a State listed heritage building;
- heritage interpretations experiences; and
- an improved public domain which will benefit workers, visitors and the local community.

The proposed modifications will not alter the public benefits identified by the IPC in granting Development Consent to SSD 8449 and will also extend the heritage interpretation possibilities.

5.2 Compliance with Environmental Planning Instruments

5.2.1 State Environmental Planning Policy (State Significant Precincts) 2005

The South Eveleigh Precinct (formerly the Australian Technology Park) is located within the Redfern-Waterloo Authority ‘specified site’ and therefore *State Environmental Planning Policy (State Significant Precincts) 2005* (SEPP SSP 2005) is the principal planning instrument that applies to the ATP.

The proposed modifications will not alter the approved land uses, gross floor area or external heritage fabric of the Locomotive Workshop. Furthermore, the proposed amendments are considered to:

- enable the long-term leasing strategy of Bay 14 and Bay 15 as a three-levelled space that can be connected upon the vacancy of Bay 14, as originally envisaged;
- maintain the Bay 15 South leasing attributes, including natural daylight, efficient floor layout, best functionality and connection to Bay 15 North (end-of trip facilities) as currently approved;
- retain the financial value in leasing Bay 15 and the associated valuation uplift;
- ensure that Bay 15 will be compliant with the relevant BCA provisions and Fire Engineering requirements; and
- maintain the high-quality architectural design as approved.

Therefore, the proposed modifications do not alter the original assessment of SSD 8449 against the provisions of SEPP SSP 2005, which will remain consistent with the objectives of the Business Zone – Business Park zone.

5.3 Environmental Impacts

The EIS submitted with the original State Significant Development Application (SSDA) addressed the likely impacts of the development, including:

- Built form;
- Design excellence;
- Heritage impacts;
- Traffic, parking and access;
- Waste management;
- Contamination;
- Noise and vibration;
- Accessibility;
- Building Code of Australia;
- Services and utilities;
- Water cycle management;
- Railway infrastructure;
- Social and economic benefits;
- Construction management;
- Ecologically sustainable development
- Development contributions;
- Site suitability; and
- Public interest.

The proposed modifications to the approved development do not give rise to any material change to the assessment of impacts that were considered and determined to be acceptable in the granting of Development Consent SSD 8449.

The relevant matters that require specific detailed assessment in relation to this modification application is discussed below.

5.3.1 Heritage

Under the NSW State Heritage Register and the Australian Technology Park S170 Heritage Conservation Register (ATP S170 Register), the Locomotive Workshops are listed as a Stage Heritage Item. In addition, the Locomotive Workshops, along with the remainder of the South Eveleigh Precinct, North Eveleigh west precinct, Carriageworks and the Operational Rail precinct is included under the Eveleigh Railway Workshops listing on the State Heritage Register (SHR Listing No. 01140).

Accordingly, Curio Projects has prepared a Heritage Impact Statement (**Attachment B**) in response to the finding of unexpected building fabric in Bay 15 South of the Locomotive Workshop during the structural investigation of the 1990s fit-out structures as part of the demolition process. The Heritage Impact Assessment provides:

- a summary of the site history of both the Locomotive Workshops Building and Bay 15;
- a detailed description of the investigative works undertaken and its findings;
- a heritage significance assessment of the mezzanine platform in accordance with the principles and definitions previously contained in *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance* and the NSW Heritage Manual, prepared by the former Heritage Branch, NSW Office of Environment and Heritage;
- a detailed explanation of the proposed works (including the proposed dismantling methodology) and the basis for the selection of the preferred option of dismantling the platform and repurposing the fabric;
- an assessment of the proposed physical and visual impacts; and
- recommendations to support the proposed works within Bay 15 South.

In assessing the physical and visual impacts of the proposed removal and interpretation of the Bay 15 mezzanine platform fabric, Curio provides the following considerations and conclusions:

- The possibility of dismantling the mezzanine platform has been considered due to the major economic impacts that its retention would mean for the overall redevelopment and revitalisation of the Locomotive Workshops as demonstrated in CIVAS (NSW) valuation report (at **Attachment E**). As a result, the analysis of the Bay 15 South mezzanine platform has been contrasted to the Bay 5 Canteen structure which was also uncovered during the demolition process. The Bay 15 South mezzanine platform is considered to have less impact on the heritage significance of the site, and importantly, on the intangible values of the site because the canteen mezzanine structure is far more significant to the overall historical, associative and social background of the Locomotive Workshops.
- The Bay 5 Canteen Platform has a clear and strong association with the workers of the ERW as it represented an area of social gathering, art, competitions, movie exhibitions, etc. In contrast to that, the Bay 15 South Mezzanine Platform **does not** have a specific associative or social significance, as it primarily performed a utilitarian function as additional storage.
- Any option that involved full or partial retention of the 1940s structure (i.e. Options 1, 2 and 3) would require the structural elements of the mezzanine platform to be removed and fire-rated with thick intumescent paint. This process could physically damage the steel and timber elements, especially the floorboards during the removal, which could then result in a negative visual impact due to the necessity of adding new materials to patch and replace any flooring damaged during the removal/dismantling process which would impact on the existing aesthetic of the platform.
- In addition, the structural engineers note that extensive further analysis and tests of the existing materials would be necessary to ensure the existing structure would remain viable for continued use according to current BCA, DDA and fire standards, above and beyond the key issues, constraints and limitations already identified.
- The structural engineers have also indicated that the footings would not support the weight of another two levels, thus requiring modern footing and columns to be installed. Therefore, Option 3, which considers dismantling and relocating the platform and the addition of a third level to achieve Mirvac's viable economic parameters would have a negative physical and visual impact on the current grid, creating additional complexity and interference between heritage and the modern fabric.
- Whilst the proposed works will have a physical and visual impact on the c.1940s fabric of the Locomotive Workshop, fabric graded as having moderate significance, as the structure will not exist in the physical form to represent the evolution of Bay 15, it will still allow for the original fabric of the workshops to be retained in-situ (fabric of exceptional significance) and will allow for the development of a historic interpretation of the c.1940s platform. In contrast, the removal of the platform will allow for each level of Bay 15 to present efficient levels of natural light and accessible solutions to be installed, which will ensure the continued, adaptive reuse and evolution of Bay 15 for many years to come.
- As a mitigatory measure, the possibility of the removed 1940's fabric to be incorporated and transformed into an interpretative design solution creates an opportunity for the story and history of the platform to still be celebrated and appreciated by visitors and users. As a result, the future design should consist of a combination of innovative interpretation ideas and the adaptive reuse of materials, creating an engaging storytelling visual narrative that celebrates the history and significance of the platform. The heritage interpretation products will be developed by Curio and the design team in close consultation with Heritage NSW and City of Sydney Council to ensure the proper outcome is achieved. In addition, the materials reutilised will be carefully dismantled according to the methodology developed by Mirvac described in this report in order to preserve the integrity of the elements to the maximum.
- The area including the brickpit and adjacent brick wall is the location of a former 1940s hoist/lift structure is located. The brick wall and potential hoist/lift structure are proposed to be the only 1940s elements to be fully retained during the proposed works; therefore, during the dismantling of the platform process, it will be crucial that their integrity and good condition is protected. This process aims to not only minimise any potential physical impact on the structure but also to retain the view lines towards the wall.
- The brick pit is currently covered by modern steel plates in order to level it up with the Ground Floor and to avoid any trip hazard. As a result, Mirvac proposes to protect the brickwork with a layer of construction plastic and backfill the pit with stabilised sand to even out the level. This strategy will ensure minimal physical impact to the 1940s pit brickwork whilst maintaining the functionality of the space. Visually, the pit itself does not highly contribute to the overall understanding of the platform structure, especially when contrasted with the retained

brick wall and potential hoist/lift. Therefore, the infill will have a minor visual impact on the significance of Bay 15.

Overall, Curio concludes that whilst the proposed works will have both physical and visual negative impacts on the Bay 15 South mezzanine platform, the alternative options involving retaining the platform would have similar physical impacts on the 1940s fabric. The visual impacts related to the removal of the mezzanine platform is proposed to be mitigated by archival recording, 3-d digital records and heritage interpretation strategies. Furthermore, the retention of the southwest corner elements, such as the brick wall and potential lift/hoist structure, will allow for their association with the area's previous use as a storeroom to still be maintained and identified. These elements, along with the other retained elements within the space such as the sandstone details, roof trusses and western and eastern brick walls, will enhance the historical background and aesthetic significance of the bay.

Furthermore, Curio also includes the following recommendations to off-set the physical and visual impacts:

- Ensure that the updated Conservation Management Plan includes a summary archival record of the rediscovery of the Bay 15 South mezzanine platform;
- Ensure that a careful dismantling process of the mezzanine platform along Bay 15 South is undertaken, with this process following the proposed dismantling methodology presented in the Heritage Impact Statement and being closely monitored by a nominated heritage consultant;
- Undertake a full archival recording of the platform structure, including photogrammetry and 3-d scanning;
- Ensure that the removed mezzanine fabric is reutilised, where possible, for heritage interpretation purposes; however, the refinement and details of the final interpretative product can be developed in close consultation with the regulatory bodies and Mirvac's appointed heritage consultant;
- Ensure that the southwest corner of Bay 15, including the retained brick wall and potential hoist/lift structure, shall remain in-situ and will be celebrated within the new architecture of the building.

5.4 Suitability of the Site

Under SSD 8449, Bays 5-15 of the Locomotive Workshop have already been approved for commercial uses. The proposed modifications will not alter the suitability of the site for these commercial uses and will ensure that Bay 15 of the Locomotive Workshop will:

- be developed in accordance with the design originally proposed and approved under SSD 8449;
- result in physical and visual impacts to the mezzanine floor, but are adequately mitigated through the provision of additional heritage interpretation features, that include archival recording, 3-d digital recording and the provision of an interpretive design that is creative and innovative which will encourage users to appreciate and engage with the actual stories of the site, including stories of Bay 15 and its former uses;
- enable the long-term leasing strategy of Bay 14 and Bay 15 as a three-levelled space that can be connected upon the vacancy of Bay 14, as originally envisaged;
- maintain the Bay 15 South leasing attributes, including natural daylight, efficient floor layout, best functionality and connection to Bay 15 North (end-of trip facilities) as currently approved;
- retain the financial value in leasing Bay 15 and the associated valuation uplift; and
- ensure that Bay 15 will be compliant with the relevant BCA provisions and Fire Engineering requirements.

5.5 Public Interest

The proposed modifications to the approved development are in the public interest, as the amendments continue to:

- facilitate the delivery of revitalised and vibrant new commercial development, set within a State Significant heritage building that will provide a range of tenancies to support start-up, small scale and large-scale enterprises;
- provide opportunities to increase the public activation of the Locomotive Workshop and appreciation of the importance of the Site;
- create new jobs and facilitate entrepreneurial innovations; and
- demonstrate excellence in design and environmental sustainability within a State heritage setting.

6.0 Conclusion

This Modification Application seeks approval to dismantle and repurpose a timber and steel mezzanine platform located within Bay 15 South and insertion of a condition into the Instrument of Approval to ensure that an interpretive design that is creative and innovative details is designed in consultation with Heritage NSW and the City of Sydney Council.

In accordance with Section 4.55(1A) of the EP&A Act, the Department of Planning, Industry and Environment, as delegate for the Minister for Planning may modify the consent as:

- the proposed modification is of minimal environmental impact within the context of the entire Locomotive Workshops development; and
- the development, as proposed to be modified is substantially the same development as development for which the consent was originally granted.

We trust that this information is sufficient to enable a prompt assessment of the proposal.

Sincerely,



Claire Burdett
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