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### **National Trust objection to TOGA Central (SSD-33258337)**

The National Trust object, in the strongest possible terms, to this proposal which will have an irreversible detrimental impact upon the 1913 Parcels Post Building. Designed by the NSW Government Architect, the Parcels Post Building was intended to be a landmark building to be seen “in the round” as a key component of Sydney’s Central Railway precinct. This proposal involves significant demolition to this building.

The design merits of the new hotel building cannot justify its placement on top of and completely around two sides of what was and must remain a landmark building at the gateway to Sydney.

The proposal is unacceptable because:

- The parcels post office is locally listed by the City of Sydney (Item #I855). It is also included as part of the State Listed Sydney Terminal and Central Railway Stations Group (SHR #01255). This should allow protective measures for the site, however the proposed development does very little to conserve these significant qualities.
- The scale of the proposal overwhelms the historic Parcels Post Building. It removes views to and from the building, overshadows it, and changes its readability from an important element of Central Station and Railway Square to a diminished footnote in the area.
- The proposal involves significant demolition to the Parcels Post Building, with a full two-thirds of the east façade set to be demolished, including the entire south-east corner with its complex concave and convex brick curves.
- The Heritage Impact Statement does not properly assess the negative effects of this development upon the building. It supports large scale demolition when, in the opinion of the National Trust, there is no need for the extent of demolition (particularly to the external elevations) to facilitate a proposed new addition.
- The documentation for this development is inconsistent, with the extent of demolition not accurately shown.
- The Visual Impact Analysis is misleading in its representation of visual impact.

It is inconceivable that a building which remains in public ownership (the proponent has a 99 year lease) can be demolished to such an extent to facilitate a hotel proposal. No other recent example of a similar nature (the Lands and Education Department Buildings) has involved external demolition to such an extent. The Trust outline our objections in detail below.

## Heritage Impact Statement

The National Trust cannot agree with the conclusion of the Heritage Impact Statement (Urbis, August 2022, p.1) that *“the proposed mixed-use redevelopment is suitable and warrants approval subject to the mitigation measures outlined”* because, in our view, those mitigation measures are completely insufficient in conserving the heritage and integrity of this historic landmark architecture.

The Heritage Impact Statement is contradictory in many instances. On the one hand, the document puts forward (p.73) the notion that *“the proposed works provide an opportunity to undertake a faithful reconstruction of the northern portion of the eastern façade”* which will support *“the visual prominence of the building in the context of the development.”* In other words, there is the opportunity and ability to restore key elements of this building.

Yet on the very same page of the Heritage Impact Statement that highlighted the opportunities for faithful reconstruction of missing external elements, the next section notes that *“the south-east corner of the fPPb (Former Parcels Post Building) will be removed to accommodate the lift and core.”* The argument is given that this will provide *“a secondary grand entrance and the opportunity to appreciate the former Parcels Post on approach from this direction.”*

The entire south-east corner of the building, over all floors, will be completely demolished in this application, yet the Heritage Impact Statement (p.73) states that this destruction will provide an *“opportunity to appreciate the former Parcels Post on approach from this direction.”*

How can the demolition of a full two-thirds of an elevation over eight entire floors, including the important historic corner of this building at the very point where there is proposed to be a new entrance from the Devonshire Street Tunnel, be promoted as either logical or an acceptable heritage outcome? How can a building be appreciated from a certain direction when it has been demolished?

Tellingly, the architectural drawings do not show an elevation drawing outlining the extent of this demolition, nor does the Visual Impact Assessment include a view from this key position, despite it being which is unquestionably the view of this building most well-known to the millions of Sydneysiders who use the Devonshire Street Tunnel to access Railway Square each day.

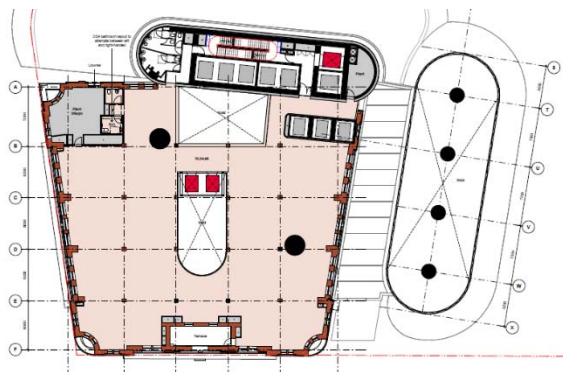


Floorplan indicates the extensive demolition on the eastern side of the existing building, including the highly significant and intact south-east corner.

(Source: Bates Smart, Demolition Plan Level 3)

The Parcels Post Building will also be significantly altered by the insertion of two very large support columns. The Heritage Impact Statement argues (p.1) that because elements have been removed and infilled *“there is therefore an opportunity to introduce supports for the tower without impacting significant fabric including the structural column grid which will be entirely respected.”*

Yet the two large columns each actually intersect with the original structural grid of this building, seemingly cutting through the structural beams that support each floor, as shown in the architectural floor plan below:



The two large columns are located on the structural grid of the original building.

It is unclear how the original building will respond to having original beams cut through, some of which connect to an external wall. Surely more than the “column grid” needs to be responded to in terms of heritage impact to a floor plate.

(Source: Bates Smart, General Arrangement Plan, Level 4)

Although the tower design is not supported in principle by the National Trust, even if it were deemed to be an acceptable heritage impact it is impossible to understand why a proposal to have two giant structural columns placed directly through the centre of the building (an intrusion visible internally as well as externally) is deemed an acceptable heritage impact. These columns appear almost arbitrarily placed in the building and awkwardly with the proposed roof.

The Heritage Impact Statement (p.75) argues that *“The proposed structural system requires two structural columns to extend from the Ground level through the top of the roof of the former Parcels Post building (proposed Level 07) and **provide support for the cantilevered section of the tower addition to proposed Levels 9 and above.**”*

**The whole idea of a cantilever is that it would be a design solution that does not require columns to support it. This building is not a cantilevered solution.**

The National Trust would argue strongly that should a tower be proposed for this site, it must not involve significant external demolition or any supports directed straight through the centre of the original Parcels Post Building. The Heritage Impact Statement (p.75) seemingly supports this position but makes clear that the proposed design is not feasible unless it has this highly intrusive and irreversible heritage impact:

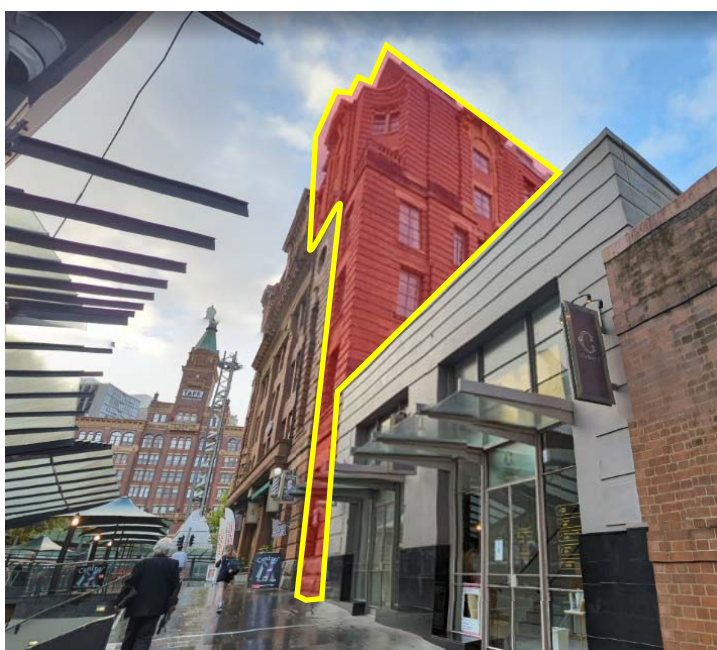
*Substantial investigations were undertaken during the design development phase seeking to avoid penetrations to the roof and interior of the former Parcels Post building. However, the constraints and structural limitations posed by not including the structural support columns will reduce its structural integrity and require minimisation of the overall available floorspace of the upper levels. **Without sufficient structural reinforcements, the projected volume of tower usage will not be possible and result in the need to greatly minimise the potential for optimisation of the subject site.** Thereby the proposed design has been developed with consideration of mitigating adverse heritage impacts throughout the existing former Parcels Post building internally where possible.*

In other words, this historic building is being compromised by a new addition to support a floor space yield which is greater than it can tolerate in terms of heritage impact. This is not acceptable and highlights that this design is not an acceptable heritage response.

## Façade Demolition

The Trust do not support the proposed demolition of the south-eastern corner of the Parcels Post Office. The demolition of this face of the currently intact building to insert a lift core is wasteful and unnecessary. We note that the lifts in this location do not service the Parcels Post Building and will replace this elevation with a blank concrete wall over 21 floors. Proposed recycling of the demolished brickwork is not an acceptable consolation prize for this overwhelmingly disrespectful design.

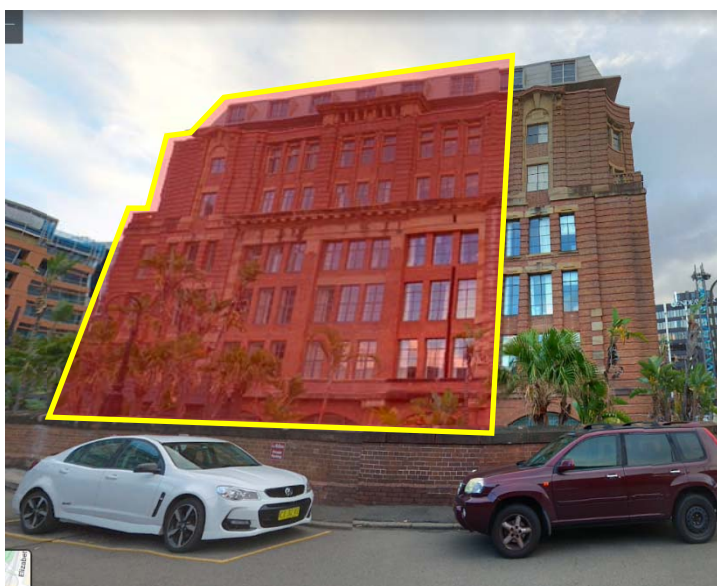
The pictures below outline the extent of the demolition works, which in our opinion are not appropriately indicated in the documentation. In the absence of architectural elevations which clearly show the extent of demolition proposed, the National Trust has prepared the following illustrations:



***The South-East corner of the Parcels Post office from Devonshire Tunnel & Henry Deane Plaza (Google Street View).***

Red shading indicates proposed demolition in this photograph, however it will extend to the basement levels and will be far greater when the intrusive later additions to the right are removed.

Demolition extends around the south-east corner of the building, demolition one of the distinctive concave corners.



***The Eastern face of the Parcels Post office from Devonshire Tunnel (Google Street View).***

Red shading indicates proposed demolition in this photograph, however demolition on the eastern side covers two-thirds of this elevation, and extends all the way to the basement levels.

This is a totally unacceptable heritage outcome for a building of this nature. Keep in mind also that this would have been the historic elevation to this building which would have come to most prominence by the now-approved Atlassian Tower which directly faces this elevation.



The demolition of the southern two-thirds of the east façade of the original building cannot be supported, particularly the south-east corner of the building. As the Design Competition Report (Version 4, Urbis, November 2021, p.20) notes:

*The relationship between the south-eastern corner of the existing fPPb and the tower addition requires further resolution. **It is noted that the corners of the fPPb are intact and original** whereas the central section of the eastern façade has been reconstructed, **and as such the Jury strongly recommends the scheme review the integration of new fabric at the south-eastern corner to enable a more sensitive integration and a clear retention of the old building's corner.***

**The present scheme does not address this concern, and the south-eastern corner with its unique concave and convex brick detailing will be demolished in this proposal only to create room for plant rooms for the new building.**

The Trust once again notes section 3.2.1 Heritage of the Draft Design Guide for the Western Gateway Sub-precinct which has the following objective:

*“Development should appropriately respond to items of heritage significance within the sub-precinct and **ensure items of heritage significance are maintained and celebrated wherever possible.**”*

Such excessive demolition cannot be described in any way as maintaining and celebrating heritage significance. The Parcels Post Building remains in public ownership. When in 75 years it is returned to the people of NSW it will be with a substantial portion of the original building façade demolished. This is unlike the recent hotel proposals and conversions for the Education, Lands and GPO Buildings in Sydney, which involved relatively minor interventions by comparison and no façade demolition.

## New Design Response

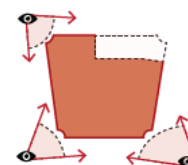
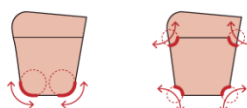
The demolition of the very corner where the Devonshire Street Tunnel exit is located and where the intersection of old and new is most apparent is not an appropriate design response. Indeed the Urban Design Report produced by Bates Smart (p.12 and 26) highlights the very importance of the concave and convex curve elements which have helped to drive the new design, but which will be demolished by this new tower. The National Trust does not accept the argument in the Urban Design Report (p.30) that the original building only has three primary corners and that the south east corner has “the least original fabric.”

The Parcels Post Office is an intricate masonry building intimately linked with the history & operations of Central Station. With the development of the Western Gateway Precinct it will be surrounded by monumental & futuristic curvaceous glass buildings, which bear little relationship to Sydney or its history.

The design challenge is to add a tower to the Parcels Post Office without being overbearing or diminishing its characteristics. Our design strategy is to employ the geometric devices used in the Parcels Post Building such as the concave and convex curves to reconcile the envelope's non-Euclidean geometry.



The Parcels Post Office is an integral part of the historic Central Precinct. Designed in Georgian style the original four storey design had an addition of two levels.



### 2. Primary Corners

We have removed the southern two-thirds of the east façade of the Parcels Post Office, being the façade with the least original fabric and the south-east corner, while retaining the other three highly visible corners.

Excerpts from the Urban Design Report highlighting the importance of the corners (left) then supporting their removal (right). (Source: Bates Smart)

## Inconsistent Documentation

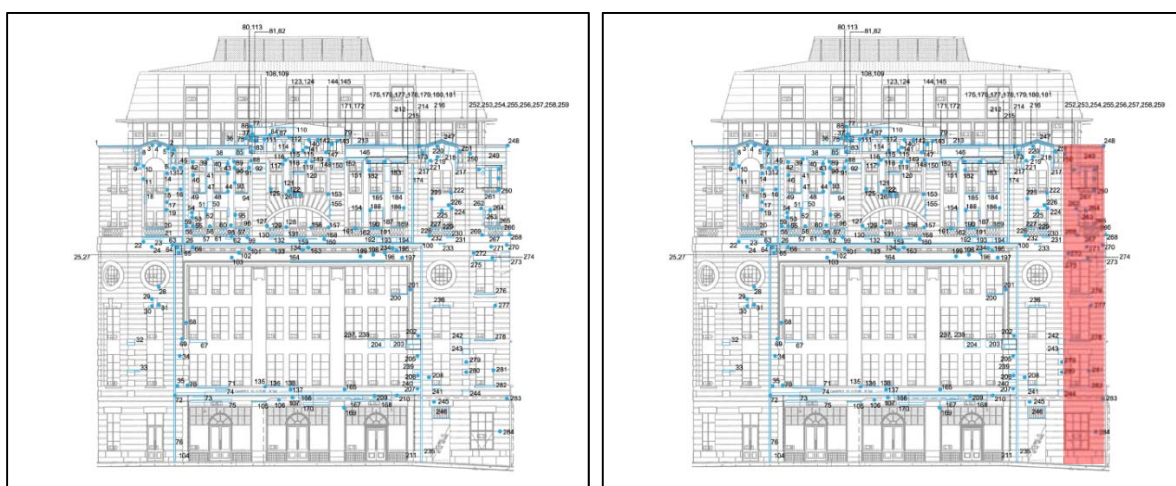
The Trust has noted that the documentation for the proposal does not accurately represent the extent of the works. The following inconsistencies have been noted:

- There is no eastern elevation outlining the demolition works in the architectural drawings, despite two-thirds of it being demolished.
- The schedule of conservation works does not indicate the whole of the intended demolition.

Bizarrely, the Heritage Conservation Schedule describes and documents repairs to the south-eastern corner of the building which is, according to the architectural plans, set to be demolished. Consequently, this proposal cannot be seen as a considered heritage response where the new design has been informed by proposed heritage works.



East Elevation showing demolition works in red hatching (left) and highlighted by National Trust for clarity (right).  
(Source: Heritage Conservation Schedule, Apex Diagnostics, p.280)



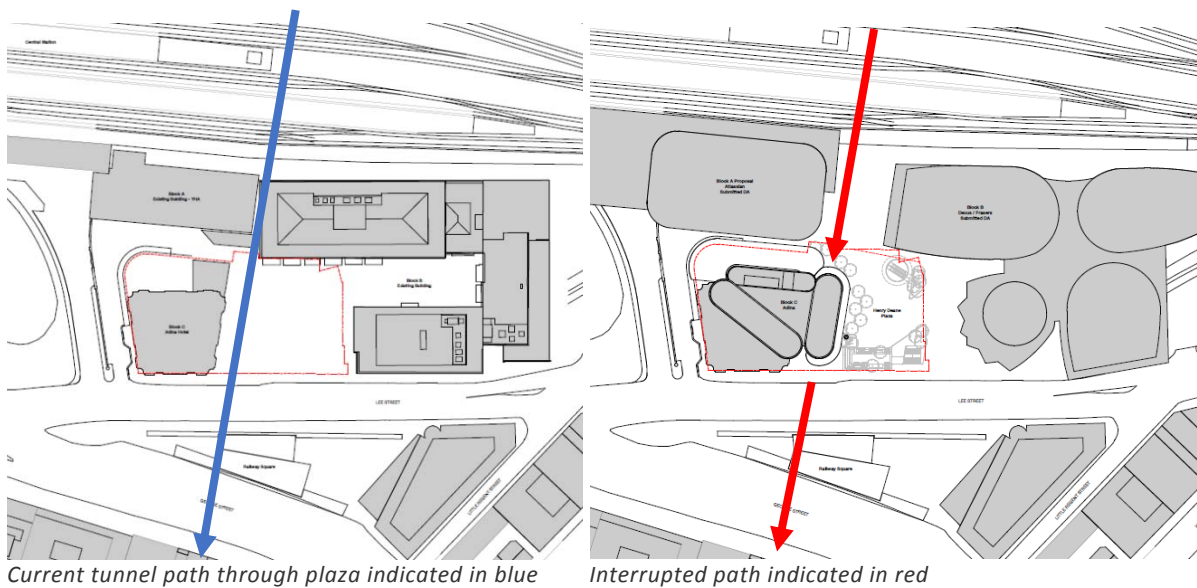
South Elevation as shown in the Conservation Schedule (left), indicating no demolition and actually showing conservation repairs to the SE corner of the building. The picture on the right indicates demolition works (in red as interpreted by National Trust).

(Source: Heritage Conservation Schedule, Apex Diagnostics, p.139)

## Blocking of the Devonshire Street Tunnel

The Trust note that the proposed design will change the public interface of the Devonshire Street Tunnel, and will not allow it to actually connect to Railway Square at street level. The tunnel, which is part of the State Heritage Listed Sydney Terminal and Central Railway Stations Group, currently exits onto Henry Deane Plaza. This exit allows fresh air and a break for pedestrian traffic in the area, and terminates with the important view of the tower of the former Marcus Clarke building.

However, the proposed development will situate its “Southern Pod” and foyer entry directly in front of the existing Devonshire Street Tunnel exit and consequently there will be no view of the actual sky upon exiting the tunnel. The Trust note that alternative design submissions seemingly allowed the tunnel exit to be into open space.



*The Devonshire Street Tunnel entry would no longer end with a view of Railway Square and its environs.  
(Source: Urban Design Report, p.71)*



## Visual Analysis

The Heritage Impact Statement (p.2) notes:

*The Urbis visual analysis has demonstrated an acceptable visual impact on the wider Central Station Precinct. It concludes that the proposed development is spatially well separated from immediate surrounding heritage items and **is spatially set back and well separated from the Sydney Terminal building and Clock Tower so that it does not dominate or block views to those items.** The location and form of the proposed tower does not significantly encroach on or visually documented public domain views as mapped.*

The Trust note that View 14 in the Visual impact Assessment (below left) involves the notable historic outline sky view of the Sydney Central Station Clocktower being completely blocked by the proposed tower when viewed from Belmore Park. The National Trust would completely dispute the claim in the Visual impact Assessment (p.31) that such visual changes “do not compete with or dominate the visual prominence of the Clock Tower or detract from its uniqueness.” For over 100 years this clocktower has been a defining element in the Sydney skyline. The claim (p.20) that “no documented historic views were discovered during our desktop review or fieldwork” is extraordinary given the Parcels Post Building’s setting in the Central Station and Railway Square precincts. This is a building that has for over 100 years been visible from every platform at Central Station, and a defining termination point to the end of George Street.



*The proposed tower completely blocks the view of the sky as backdrop to the Central Station Clocktower (left), yet its impact is noted as “medium”. Instead of this view of the Parcels Post Building (right) from the end of George Street as it enters Railway Square, the Visual impact Assessment takes a view from a further 500m to the north and claims the overall impact will be “low”, when the proposed tower will completely dwarf the original building in this view. (Source: Visual impact Report, p.30; Google Maps)*

The Visual Impact Assessment (View 11) is once again misleading in terms of the view of this proposal as seen from Broadway when approached from the south. The National Trust are again extremely disappointed that a view has been chosen from the eastern side of the street which obscures the proposed tower with light poles, flags and shop awnings. This view can in no way be seen to be representative of the visual impact from this key approach, and cannot be described as being of “low” impact.





*View 11 in the Visual Impact Assessment showing the proposed tower viewed from Broadway (before left, and after, right). This view conveniently obscures the impact of this proposal. (Source: Visual impact Report)*



*The actual view of the proposed building when seen from Broadway (before, left, and after, right) is far more prominent and completely dominates the termination of this main road to Sydney. (Source: Google Maps with National Trust overlay)*

## Conclusion

The lack of a masterplan for the “Western Gateway” has led to an agglomeration of towers, sitting atop historic buildings, within the boundary of the State Heritage Register listing of Central Station. In the right setting, these contemporary towers could be considered good examples of modern Australian architecture, yet as they stand they represent some of the worst contemporary built outcomes for our cities. This is more than regrettable, and could have been so easily avoided had there been a considered plan for this place.

Built on top of historic buildings, their design involves significant and unnecessary demolition of historic material. Built on the northern side of a plaza, they will cover a public place in shade. They are compromised in themselves by their clumsy interaction with the heritage buildings they mount, and leave unharmed such mediocre buildings such as the Mercure Hotel to the south of Railway Square. We have to question our priorities, and regret our legacy.

The National Trust maintain that, at the very least, this proposal must not be approved in its current form which involves such significant and totally unnecessary demolition to the State heritage listed Parcels Post Building. This simply cannot occur – to do so would make a mockery of the whole heritage process in NSW.

David Burdon, Conservation Director