

Mr David Glasgow
Principal Planning Officer
Key Sites Assessments
Department of Planning, Industry & Environment
4 Parramatta Square
PARRAMATTA NSW 2150

By email: David.Glasgow@planning.nsw.gov.au

Dear David,

RE: Request for Advice - Atlassian Office and Hotel Development (SSD-10405) Central Precinct

Thank you for your invitation requesting advice from the Heritage Council of NSW on the State Significant Development Application for the Atlassian Office and Hotel development, within the Western Gateway Sub-precinct (State Heritage Register (SHR) listed Sydney Terminal Rail and Central Railway Station Group, email received 10 December 2020).

The following comments are provided by Heritage NSW as Delegate of the Heritage Council. We note that this project is central to the NSW Government's transformational vision for the broader Central Precinct and part of the Government's ambitions for a technology precinct at the Western Gateway sub-precinct of Central Railway Station.

We thank you for the continued opportunity to input into planning controls for this development and shape heritage and public realm outcomes.

Heritage NSW has now reviewed the EIS documentation, in particular:

- SEARs for SSD-10405, issued 15 October 2020;
- *Environmental Impact Statement: Atlassian Central 8–10 Lee Street, Haymarket* (EIS) prepared by Urbis, December 2020;
- *Aboriginal Cultural Heritage Assessment: Former Inwards Parcels Office*, (ACHAR) prepared by Urbis, 23 September 2020;
- *Former Inwards Parcels Office Historical Archaeological Assessment and Research Design*, prepared by AMBS Ecology & Heritage, September 2020;
- *Heritage Impact Statement Atlassian Central*, (HIS) prepared by Urbis, 30 September 2020;
- *Atlassian Central Development Architectural and Urban Design Report*, 2 December 2020; and,
- *Conservation Management Plan: Former Inwards Parcels Shed*, (CMP) prepared by Urbis, 30 September 2020.

We provide the following comments specific to the works within Block A of the Western Gateway sub-precinct for the construction of a commercial tower above the former Inwards Parcels Shed. The significance of these key elements is summarised at **Attachment A** to this letter, and previously provided.

General comments

- The Heritage Council has previously stated its recognition and support for appropriate development in and around this sensitive precinct as part of the evolution of the city (Heritage Council's initial response, 19 December 2019).
- The Heritage Council recognises that the determination to uplift this part of the CBD, including the up zoning of planning height controls, has been made by Government. Whilst the scale of developments in and around Central will change the current scale and legibility of the heritage precinct, the Heritage Council recognises the opportunity to ensure measurable heritage outcomes through considered design, materiality, heritage interpretation, and leading-edge storytelling.
- This will ensure the public's interaction with Central and the new spaces resonates with the unique history of the place from First Nations contact and connection, to its evolution as part of the wider Metropolis.
- Where possible, important view lines should be retained and celebrated, and the Heritage Council notes the important view line studies to inform this opportunity.
- Noting the resulting changes required to the vernacular *Former Inwards Parcels Shed* and surrounding elements (including the Upper Carriage Lane and forecourt, retaining wall elements), the Council supports requirements for high-quality and engaging interpretation of this building and its function.

Interpretation

- On this basis, the Heritage Council recommends conditions that ensure heritage interpretation is a critical component of the project. It should communicate and strengthen the strong visual and historic connection between the former Inwards Parcel Shed and the former Parcels Post Office building, as well as the connection and function between the Shed and Platform 1.
- Further, the Heritage Council strongly advocates for the interpretive experience to be considered across whole SHR site, including integration with the two other blocks within the Western Gateway sub-precinct, as well as the broader Central Railway Station SHR site. As previously advised, the Heritage Council requests that there be a coordinated and consistent heritage interpretation approach and design across the whole precinct. This is critical for a seamless and wholistic interpretive experience. We strongly recommend ongoing consultation and input from Heritage NSW.
- It is understood that a heritage interpretation strategy is currently being developed and that this is proposed to occur concurrently with further detailed design development of the project. Whilst we support the integration of interpretation as part of the detailed design, the strategy should be finalised prior to the approval of the project to enable the detailed design to be informed by this document and ensure interpretation is at the core of the development. Again, it also needs to be integrated with the overall interpretation strategy for the entire SHR site.
- In addition, we reiterate the previous recommendation that a program of Aboriginal ceremony be developed to re-awaken the landscape as part of the proposal. It is also recommended that stories are collected from the life of the former Inwards Parcel Shed to 'farewell' the place, and to use the stories as part of the interpretation.

Designing with Country Framework

- We support the inclusion of the *Designing with Country Framework* (BVN, 28 July 2020). This is a useful document to begin setting out the opportunities and specific design

measures to reinforce Aboriginal Cultural Heritage and placemaking. It is acknowledged that this document is still being developed and will be augmented and updated as the project progresses. To assist with this task, the project team are encouraged to also reference the GANSW '*Connecting with Country*' framework released November 2020.

- We reiterate that both frameworks are critical parts of the interpretation of the place and should be an integral part of the overall design. We strongly recommend ongoing consultation and input from Heritage NSW.

Visual changes

- Noting the previous comments around the scale of the new tower and cumulative neighbouring development, opportunities to emphasise the legibility of the existing low scale heritage elements should be ensured through development conditions.
- The proposed multi-storey commercial tower will affect the legibility of the adapted former Inwards Parcels Shed, particularly when viewed from Railway Square. The proposed green roof on the adapted Shed further adds to the reduction in its legibility. Whilst we understand that the concept for the green roof was partly around recognising Aboriginal cultural landscapes, it is again recommended that this element of the design be modified to better reflect the original, unadorned industrial character of the shed (as per Heritage Council letter to the applicant, 16 October 2020).
- It is also noted that the *Heritage Setting View Analysis* Report (Urbis, September 2020) does not include the two other significant multi-storey developments proposed for the Western Gateway sub-precinct. These should be included to ensure the cumulative impacts to the SHR site are clearly understood.

Changes to the former Inwards Parcels Shed

- The former Inwards Parcels Shed is historically important as an integral part of the SHR listed Central Railway Station and contributes to the role of the railway transport system in the delivery of mail. It has historical, representative, archaeological, rarity and associative heritage values. The building itself is a highly bespoke building constructed of expressed internal timber framing with corrugated cladding. It is unique not only in the context of Central Railway Station buildings, but also due to its size, detail, dedicated use and integration with Central Railway Station via direct access to Platform 1.
- The proposed works include demolition and partial rebuild of the Shed utilising some significant original fabric which will have obvious impacts to fabric and setting. The works, described as a reconstruction, do not align with the Burra Charter definition, which states that reconstruction means returning a place to a known earlier state. Therefore, the *Heritage Impact Statement Atlassian Central* should assess the works and resultant impacts, as an 'adaptation' rather than a 'reconstruction'.
- It is recommended that the extent of demolition and removal of fabric is reduced as much as possible to minimise impact to significant/original fabric.
- It is acknowledged that further detail design development will be undertaken on the building and that as much original timber framing as possible will be reused in the building's adaptation. However, it is still unclear how other distinctive elements of the building, including the existing masonry base and chimneys, and sandstone plinths of the building will be meaningfully used as part of the adaptation and interpretation of the building. Further detail is required as per Heritage Council letter to the applicant, 16 October 2020.
- We also suggest that the interface between the adapted Shed and Platform 1 (proposed 10m high masonry wall) sees further resolution. The proposed treatment of this interface removes the physical and historical connection between Platform 1 and the former

Inwards Parcels Shed. There is an opportunity, through architectural expression, to actively interpret the historic functioning of the Shed and the important and unique connection it had with Platform 1 and the broader Central Railway Station itself.

Other Environmental matters

The following comments, particularly around demolition, are in response to details that have not been previously presented in any detail to the Heritage Council and require further resolution.

- The proposed work includes extensive demolition, not only as part of the adaptation of the former Inwards Parcels Shed, but also externally. This includes the removal of large areas of masonry from the Ambulance Avenue (Lower Carriage Lane) retaining wall, sandstone plinths and corbels, and iron vent grates. It is recommended that the extent of demolition is reduced as much as possible to minimise impact to significant/original fabric, including to the size of the new large opening within the heritage retaining wall. Where significant fabric is proposed to be removed, as much fabric as possible should be salvaged for future conservation works or reinstatement.
- In addition, the document notes removed significant fabric will be reused where possible. Further detail is required to understand what elements will be reused and in what application, including interpretive measures.
- The works also include the removal of all awnings along Lower Carriage Lane. Further detail is required to understand what the implications for removal of these functional elements will be on retained fabric, as well as any future use or interpretation of these elements.
- Modification to surface levels to the west of the former Inward's Parcel Shed and along Upper Carriage Way are proposed to occur. It is unclear what impact the change in surface level will have on the adjacent significant retaining walls and the former Parcel Post Office building as well as the sandstone post on Upper Carriage Lane. We suggest additional details be developed to ensure impacts are minimised, including how the use of the former Inwards Parcels Shed including its loading dock function will be interpreted as part of the works.
- Further details of the fire booster proposed to be installed within the heritage retaining wall (Lower Carriage Lane) should be provided to ensure the treatment does not adversely impact on the character of the wall.

Historical Archaeology

The proposal involves the establishment of a new mixed-use development, including a 38-storey tower with basements that would be built over the existing former Inwards Parcels Shed, located on the western boundary of Central Station, which would be adaptively reused.

We provide the following comments concerning historical archaeology:

- The EIS references the Historical Archaeological Assessment by AMBS in addressing SEARs Item 11 'Heritage & Archaeology', which requires the preparation of an historical archaeological assessment to address the potential, significance and impact of the proposed development on relics. The EIS states that the archaeological recommendations presented in the Assessment should be implemented to suitably manage the potential archaeological resource on site.
- The Assessment includes a succinct historical background of the site, as well as useful comparative analysis of relevant archaeological investigations and sites in the locality of the proposed development.

- The assessment of archaeological potential in the Assessment determines, principally from overlaying historical maps and aerals, that the Benevolent Asylum was partially located on the site. Heritage NSW concurs with this conclusion.
- The Assessment concludes the potential archaeological resource is likely “to be of good integrity”, and therefore (some) evidence uncovered associated with the Benevolent Asylum could meet the threshold for State significance, with the site overall considered of high research potential. Findings from archaeological investigations undertaken in proximity to the site are cited as supporting evidence for these conclusions, notably excavations by Casey & Lowe in the Western Forecourt of Central Station in which archaeological evidence of the Asylum was identified c. 1m below ground level. The Assessment contends that, as the ground level of the proposed development site has likely not been built up nor levelled during the construction of Ambulance Avenue (located between the site and the Western Forecourt), then “...it can be assumed that the basement level of the Site largely retains the topography of the nineteenth century landscape.”
- Heritage NSW observes that no levels reduced to Australian Height Datum (AHD) have been included in the analyses leading to these conclusions, whether from the site basement/s, other areas of the site, the Western Forecourt archaeological investigations or additional relevant areas adjacent to the site. The argument appears to be that topographic levels across the site and vicinity are broadly consistent and that potential archaeology on site will likely be at depths comparable to the Asylum remains in the Western Forecourt, none of which is supported by references to reduced levels. Further, there is minimal consideration of the likelihood of disturbance to potential archaeological deposits on site. The Assessment contends that the degree of disturbance to the site cannot be quantified at this stage– which is reasonable– however it does not include discussion, for example, of the probability for modern services to run beneath the site, which may be likely, given its central city location. Such truncation could impact the potential and integrity of the archaeological resource, including the expected levels at which it may be encountered. The approach to topographical analysis has also had some bearing on the assessment of archaeological significance and the Archaeological Research Design presented in the Assessment. This means that the archaeological potential and integrity of the site may be less than assessed by the AMBS Assessment report.
- THE AMBS Assessment report has also provided a basic research design (Section 7) and a recommended archaeological program including heritage induction, archaeological testing and monitoring to be followed by open area stratigraphic excavation where warranted by the significance of the archaeological remains. Heritage NSW concurs with these recommendations.

It is noted that the overall project will be subject to further development of the detailed design. We strongly recommend ongoing consultation and input from Heritage NSW during this process.

I wish to again acknowledge the critical engagement by all parties, including the proponent, with Heritage NSW and the Heritage Council of NSW in the planning and design phases of this development. Whilst the impacts to the setting and heritage character of the area are significant, the engagement has sought to mitigate impacts wherever possible, and to deliver public heritage opportunities across this critically significant cultural landscape.

If you have any queries regarding the above matter, please contact Tim Smith OAM at Heritage NSW on 0419 648 933 or via email, tim.smith@environment.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Frank Howarth', with a stylized flourish at the end.

Frank Howarth AO
Chair
Heritage Council of NSW
24 February 2021

ATTACHMENT A

Development Context

The proposed development is part of the broader Central State Significant Precinct (CSSP), which encompasses the entire State Heritage Register (SHR) listed Sydney Terminal Rail and Central Railway Stations Group (SHR 01255) and Mortuary Railway Station (SHR 01869) sites. The SSP is divided into ten distinct sub-precincts. The Atlassian development is located within an area identified as the Western Gateway sub-precinct. This area contains the former Parcels Post Office building, the former Inwards Parcels Shed, and the portals to the Devonshire Street tunnel. This sub-precinct comprises three allotments - Block A (Railway Square YHA Shed), Block B (Henry Deane office block, and Block C (Adina Apartment Hotel).

Site significance and description

Sydney Terminal Rail and Central Railway Stations Group

- The SHR listed Sydney Terminal Rail and Central Railway Stations Group is of exceptional significance as Australia's largest transport interchange. It is the first major terminus to be constructed in Australia and the only example of a high-level terminus in the country. It is also significant for its continuity of railway use since 1855 and as the largest formally planned addition to the urban fabric of Sydney prior to World War 1, intended to form a gateway to the city.

The former 1906 Inwards Parcels Shed

- The former 1906 Inwards Parcels Shed (now YHA Railway Square) is important for demonstrating the role of the Central Railway Station site, and NSW Railways generally, in the development of postal services in NSW. It retains its original scale and form. Further, and as noted in the Heritage Impact Statement, it is a unique version of its type within NSW due to its size, detail, dedicated use and integration with Central Railway Station via direct access to Platform 1 and linkages via a series of conveyor belts, lifts and tunnels to deliver parcels to other platforms across Central Station.