



Level 6, 10 Valentine Avenue
Parramatta NSW 2150
Locked Bag 5020
Parramatta NSW 2124
DX 8225 PARRAMATTA

Telephone: 61 2 9873 8500
Facsimile: 61 2 9873 8599
heritagemailbox@environment.nsw.gov.au
www.heritage.nsw.gov.au

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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 – Response to Submissions

Thank you for your invitation requesting advice from the Heritage Council of NSW on the Response to Submissions (RTS) for the State Significant Development Application 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 1 July 2021).

We have reviewed the RTS documentation, in particular:

- *Response to Submissions: Atlassian Central 8–10 Lee Street, Haymarket* (RTS) prepared by Urbis, June 2021;
- *Appendix B Supplementary Design Report*, prepared by various, 30 June 2021;
- *Appendix D Atlassian Central Response to Submissions – Heritage & Archaeology*, prepared by Urbis, 7 June 2021.

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.

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 fundamentally 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, cohesive heritage interpretation, and leading-edge storytelling (Heritage Council's initial response, 19 December 2019).

Outstanding matters

The RTS documentation still does not clearly articulate how the proposed heritage impacts to the SHR listed site's significance and values have been assessed and clearly understood, and how it has been used to inform the development.

- The Heritage Council notes that the updated *Heritage Setting View Analysis* report better demonstrates the obvious visual changes to the precinct, including to its predominant low height scale and development density as a result of the proposal. The renderings now clearly show the cumulative impacts of the proposed tower cluster within the Western Gateway sub-precinct and the significant impacts to the site's State heritage significance and values, including the erosion of the readability (legibility) of the heritage cultural landscape and its context.
- Due to the proposed changes to the vernacular *Former Inwards Parcels Shed* and surrounding elements (including the Upper Carriage Lane and forecourt, retaining wall elements), it is critical that as much significant fabric as possible is retained to ensure visual clues to the former use and function of the place are maintained, as part of the overall SSD redevelopment outcomes. This is in addition to the need for high-quality and engaging interpretation of this building and its function (*see recommendations below*).

Interpretation

- We generally support the overarching Heritage Interpretation Strategy for interpretive experiences and elements including the key themes. We note that detailed design development is still yet to be undertaken for the further development of stories, and the selection of appropriate experiences, elements and designs. This should be further developed in unison, and work with and complement the Designing with Country Framework, and as part of the overall design development for the building. This includes the development of a heritage interpretation plan.
- The Heritage Interpretation Strategy states ongoing consultation with several groups. However, this does not include Heritage NSW or the City of Sydney. We request that the Heritage Council and these key entities continue to be consulted as part of the detailed design development to ensure there is a consistent and coherent approach for this critical component of the project.
- We also reiterate that interpretation 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.
- In addition, that the interpretive experience is considered across the 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 note that public art, wayfinding and signage will be integrated into the overall detailed design. Whilst we encourage public art to consider heritage interpretation themes and stories, we recommend that public art is used as a supplement to heritage interpretation and not a substitute. Both heritage interpretation and public art have their own role and purpose though work in unison and complement each other.

Recommendation: The Heritage Council, Heritage NSW and City of Sydney are to be consulted as part of the ongoing detailed design development of the project's heritage

interpretation to ensure there is a consistent and coherent approach for this critical component of the project.

Recommendation: The project's heritage interpretation 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. The heritage Interpretation is to be considered across the 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.

Recommendation: The project's heritage interpretation is to be developed to the satisfaction of the Heritage Council or its delegates.

Designing with Country Framework

- We support the inclusion of the *Designing with Country Framework* that has commenced 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 this and the project's heritage interpretation are critical parts of the interpretation of the place and should be an integral part of the overall design work in unison and complement each other. We strongly recommend ongoing consultation and input from Heritage NSW.

Recommendation: The Heritage Council and Heritage NSW are to be consulted as part of the detailed design development of the Designing with Country framework to ensure there is a consistent and coherent approach for this critical component of the project.

Visual changes

- We acknowledge the *Heritage Setting View Analysis* report has been updated to include the two other significant multi-storey developments proposed for the Western Gateway sub-precinct. However, we request that a further visual analysis be undertaken to provide a more holistic analysis of all views including looking from the south (from Broadway) and from the east (from Prince Alfred Park) to the proposed development. This will allow a clearer understanding of the visual impacts of the proposed development.
- Again, we request that the legibility of the adapted former Inwards Parcel Shed be emphasised, further to our previous comments around the insertion and scale of the new tower and cumulative neighbouring developments. This includes the Heritage Council request to remove or significantly re-scale the proposed green roof, sought by Atlassian as part of the proposed adaptation of the former Inwards Parcels Shed. This was a significant element of previous Heritage Council submissions and sought to achieve a better reflection of the original, unadorned industrial character of the shed post the insertion of a multistorey tower through its innards. It is noted that the green roof component is still proposed as part of the works but with limited additional content to demonstrate how heritage impacts have been minimised.
- The provided renderings emphasise that the ability to read the former Inwards Parcel Shed structure within the industrial landscape setting and its aesthetic is still considerably diminished, particularly when viewed from Railway Square. We stress that this is important in the context of the broader Atlassian development, which will result in the complete demolition and partial adaptation of the former Inward's Parcel Shed, including diminishment of its significance, setting, authenticity and historic use.

Recommendation: The green roof component of the works to be substantially modified to minimise impacts to the industrial character of the site, its setting and the shed. This is to be undertaken to the satisfaction of the Heritage Council.

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 contributed to the role of the railway transport system in the delivery of regional mail. As stated above, the proposed works include demolition and a partial rebuild of the Shed which will have obvious impacts to fabric and setting. We previously requested a reduction to the extent of demolition and removal of fabric as much as possible to minimise impact to significant/original fabric.
- It is not clearly demonstrated from the additional information provided how the reuse of the demolished fabric will be incorporated and used appropriately. It is unclear how it will be determined what significant elements will and will not be salvaged and the reason for their inclusion/exclusion. Elements such as the brick chimneys and sandstone plinths of the shed provide evidence of the former use of the area and association with the former Inward's Parcel Shed and its historic function. As noted previously, these elements provide visual clues as to the former use and function of the place and should be meaningfully used as part of the adaptation and interpretation of the building..

Recommendation: Further detail and designs are required to understand what elements will and won't be salvaged, and how this is determined. Then how they will be reused. This should be undertaken in consultation with, and to the satisfaction of the Heritage Council or its delegate.

Other Environmental matters

- In addition to the demolition of the former Inward's Parcel Shed, the proposed works include extensive demolition to elements which have obvious impacts and loss to fabric, context and setting.
 - Lower Carriage Lane retaining wall for temporary construction access and a new large arched opening
 - removal of all awnings along Lower Carriage Lane for temporary construction access and a new large arched opening
 - modifications to surface levels to provide a ramp to the Upper Carriage Way
 - sandstone plinths and corbels, iron vent grates

As noted previously, these elements provide visual and physical evidence of the former use and historic function of the Shed. The visual clues to its former use are even more critical to seek to maintain, as part of the overall SSD redevelopment, due to the substantial impacts.

- The RTS documentation states that the scope of this work has been based on the future broader Western Sub-precinct revitalisation being undertaken by others including TfNSW. However, how this will be manifested from an architectural and urban design perspective is yet to be realised, including its relationship with this proposal.

Recommendation: Further information is to be provided to better demonstrate the rationale for the proposed works and how the demolition and reuse of fabric and structures will be minimised. This is to be undertaken in consultation with, and to the satisfaction of the Heritage Council or its delegate.

- The proposed inclusion of large landscaping along the northern side of the former Parcel's Post Office building (facing the proposed future Third Square) will have visual impacts on the building and its significant façade, as well as the setting of the place. This further compromises the industrial aesthetic of the place and should be removed.

Recommendation: The proposed large landscaping along the northern side of the former Parcel's Post Office building (facing the proposed future Third Square) is to be removed.

- A Temporary Protection Plan for the site is developed to ensure that significant buildings and fabric are adequately protected during the works. Protection systems are to ensure significant historic fabric is not damaged or removed, potential impacts due to vibration are minimised, and traffic is appropriately managed during the works. In addition, the monitoring and repair of any damage of significant items (including the former Parcel's Post Office building) as a result of construction should include inspection before, during and after completion of the works.

Recommendation: A Temporary Protection Plan for the site is to be developed to the satisfaction of the Heritage Council or its delegate.

Historical Archaeology

- We appreciate that previous comments have been responded to in the Urbis RTS report pp.78-80, including advice that further test excavation is anticipated to be undertaken under a separate Section 60 approval pathway. This will be cross-referenced with the surrounding archaeological context.
- Heritage NSW advises DPIE that this is an appropriate strategy and that a prior S57 for initial testing in Ambulance Avenue was approved in October 2020. Should testing identify intact archaeological resources then Conditions of Approval should be placed on the development. This must ensure that management of the historical archaeology is in accordance with an Archaeological Research Design, Work Method Statement, and by an appropriately qualified Excavation Director who meets the Heritage Council Criteria.

Aboriginal Cultural Heritage

- As at 8am, 14 July 2021, an accessible format of the Aboriginal Cultural Heritage Assessment Report (ACHAR) had not been provided to Heritage NSW for its review.

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 the Heritage Council and Heritage NSW during this process.

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



Frank Howarth AM PSM
Chair, Heritage Council of NSW

14 July 2021