

**ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000**

URBIS.COM.AU
Urbis Pty Ltd
ABN 50 105 256 228

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Toga Development & Construction
Level 5, 45 Jones Street
Ultimo NSW 2007

To whom it may concern,

CENTRAL WESTERN GATEWAY BLOCK REZONING (BLOCK C) – SUPPLEMENTARY HERITAGE REPORT

This letter has been prepared in response to submissions on the proposed rezoning of the Draft Central Western Gateway Block C Rezoning Proposal. This report responds to key comments related to built heritage in submissions from City of Sydney Council and Heritage NSW (as delegate of Heritage Council of NSW) which are summarised in the Department of Planning, Industry and Environment Submissions Summary. The below responses formed Urbis' initial Supplementary Heritage Report and have been updated to respond to the additional advice from the Project Review Panel, provided following their meeting which was convened on 5 May 2021.

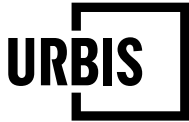
Agency comments have been set out in bold below and Urbis responses set out directly under each.

CITY OF SYDNEY COUNCIL

Engage in an ongoing, meaningful consultation workshop process with the NSW Heritage Council to develop a proposal that will maintain the heritage values of the fPPb.

This process has been subject to an extensive program of stakeholder engagement which will continue through the design competition and Development Application stages. Section 1.7 of the Heritage Impact Statement (HIS) sets out all instances of consultation undertaken prior to the submission of the rezoning application. In summary a series of meetings were undertaken with the Design Review Panel, City of Sydney Council and Heritage NSW. It is noted that involvement in these meetings does not reflect endorsement by any parties however involvement is noted here to confirm where parties have been involved in the development/direction of the proposal.

We note specifically that two presentations were undertaken with the Heritage Council of NSW. Comments from Heritage NSW note that ongoing consultation should be undertaken as part of the competitive design process and Development Application. It is noted that the feedback received from the NSW Heritage Council to date has indicated that further engagement is not required until after the completion of a design competition when an indicative design and design team have been selected for the project. This ongoing consultation is also a recommendation in the HIS and is the intention of the proponent.



Adopt one of the two independently written CMPs (one by the Government Architect's Office and one by TZG for TfNSW).

No site-specific CMP has been adopted at this stage. The draft CMP prepared by Urbis for this process was retracted and adapted into a Conservation Management Strategy comprising a series of conservation principles. The CMS adopts principles established in the previous heritage management documents (including Central Station CMP 2013, Heritage Group State Projects CMO 1997, GML 1998) which remain relevant to the state of the site today and the emergence of the owner's requirements. It is appropriate that the assessment is undertaken against this CMS. This CMS will be used to guide the development of a CMP at detailed DA.

Note that the Project Review Panel recommended to adopt a precinct wide CMP. This recommendation has been reflected in the Design Guide outlined below in this response. This document is being prepared as part of the Central SSP Study.

In relation to the TZG CMP referenced in the comment above we anticipate that the Council reference may instead be related to a Heritage Framework prepared by TZG for TfNSW relating to the broader Central Precinct.

The purpose of the TZG Heritage Framework for the Central Precinct is to identify heritage constraints and opportunities in the Precinct and define heritage objectives and principles for items within the Heritage Framework study area. It is intended that the Heritage Framework will inform the preparation of a precinct-wide CMP, which is required to be prepared by the Draft Western Gateway Design Guide (refer Section 4 of the RtS Report) and addressed in a future Development Application for Block C.

The TZG Heritage Framework does not, and is not intended to, hold any statutory weight. Rather the document has been prepared to provide guidance to TfNSW and its partners on heritage considerations in the context of more extensive change within the Central Precinct than was anticipated by the Draft Central Station Conservation Management Plan, prepared by Rappoport and the Government Architects Office in 2013.

As such, this rezoning proposal does not adopt any current CMP for the precinct as suggested by the City of Sydney in their submission. However, the proponent has committed to the preparation of a precinct-wide CMP as referenced above, the preparation of which has commenced, and will be required to be addressed in a future Development Application for Block C.

Ensure the zone between the fPPb and the base of the tower is predominantly clear of structure to provide an appropriate curtilage to the heritage building.

The Structural Assessment provided by Robert Bird Group (appended to Town Planning Response) provides a full analysis of alternative options considered to structurally support a vertical addition above the former Parcels Post building. As outlined in this assessment, the proposed reference design represents a minimal intervention solution to the significant heritage fabric of the former Parcels Post building.

The PRP requested the application of metrics in relation to the Vertical Separation Zone. The suggestion for metrics (in the Design Guide) was, as we understand, proposed in response to an earlier proposal to include retail, food and beverage, and/or plant enclosures within the vertical separation zone. As per the revised Design Guide (refer Section 4), there is to be no enclosure other than necessary structural elements within this zone and as such a metric definition of a setback such as that outlined within the previous PRP advice is no longer considered necessary. Further, it is considered more appropriate to require any structural design in a future development application to demonstrate that the structure within this zone has been minimised to the extent reasonably possible, rather than comply with an arbitrary metric.

There is no detailed design at this stage for the resolution of the structure beneath the tower. A potential zone for structure has been identified. We note that wind mitigation was a key factor in defining an appropriate zone for structure. Refer to the Response to Submissions prepared by FJMT for an outline of solutions that were tested and discounted.

It is important that the structure and the relative significance of the area in which it will be inserted is reconciled to a preliminary level at rezoning stage. Therefore, this zone has been considered in the HIS and the response for its potential heritage impact. It is not however practical to undertake a detailed structural assessment or an associated assessment of heritage impact without a clearer understanding of the design response that will be permissible on site. This will be tested and assessed rigorously in the future stages of the project.

It is reasonable that the HIS assesses structural intervention at a preliminary level and details principles to guide the development of structural solutions upon which support of the scheme is contingent. The assessment of the principle of a vertical addition to the building and the structure zone by Urbis notes the following:

- The interiors were historically modest, pedestrian and unremarkable, and it is generally understood that this is by design. It is of note that the architect of the subject building, McCrae also designed the Education Building on Bridge Street on a similarly limited budget, concentrating resources and design flair on the highly significant facades with a public face.
- This building is not intact and is substantially altered. This is detailed in Section 3.8 and 3.9 of the HIS (Urbis November 2020). The continuous and significant previous alterations internally are of note in relation to the potential to insert new structure.
- The interiors of this building historically performed in a functionalist way and the structure was intentionally flexible to allow for the movement of elements within the space. The concept of new insertions is therefore historically precedented and the existing internal configuration does not demand retention.
- There is recognised potential to provide lateral bracing to the highly significant north and west façade through the introduction of new structure. There is also potential to ensure the building meets current codes. This is to be further investigated in future stages. This was one of the justifications for the work currently being carried out at McCrae's Education Building on Bridge Street.

With consideration of the above, there is no specific interior fabric from which additional structure would detract and the principle of inserted additional elements into the floorplates is considered acceptable.

The recommendation in Council's submission to ensure the zone between the building and the base of the new tower is predominantly free of structure can be adopted as an objective in the ongoing design of the development. It should also be noted that the Western Gateway Design Guide is proposed to be updated to ensure that any vertical addition to the building must demonstrate an innovative structural solution. Urbis supports a guiding objective to minimise structure in this area as much as possible to give the greatest prominence and foreground to the heritage structure. However, requirement to cantilever and prohibition of any support structure penetrating the building is not considered to be necessary provided that the retention of a representative area of structure is stipulated and the facades are given the aforementioned prominence.

A study of interventions into highly significant buildings highlights several successful examples. The major redevelopment of the Education Building on Bridge Street has a number of comparable elements. The building was also designed by George McCrae in an Edwardian style however the

Education Building is considered to be of a significantly higher design quality, resolution and social significance. This building is subject to an approved development which includes retention of several key internal spaces, substantial internal demolition, internal modifications, and new roof top addition.

The new addition required the removal of slabs to level 6 and 7 in their entirety (in addition to partial removal of structure throughout) and was visible in views to the surrounding streets. The additional load was supported by some additional columns and slabs and the strengthening of the existing columns with steel plates and encasement in high strength concrete. However, it was endorsed by the NSW Heritage Council and the Design Review Panel on the basis of its high quality execution, maintenance of the visual prominence of the Education Building and the detailing which retained the primacy of the of the historic sandstone facades. The new strengthened and modified structure also protects the exceptionally significant facades in terms of lateral bracing for earthquake protection.

The addition to the David Jones Building at 77 Market Street has Stage 1 and Detail Design DA approval and comprises a mixed-use development over the original Functionalist form. The new form is set back from the primary facades and retains their prominence. The vertical addition required structural strengthening throughout. The structure was planned to be reinforced through the removal of the existing concrete encasement around the existing steel columns and replacement with modern reinforced concrete encasement.

The works at City Tattersalls includes a detailed assessment of the building which identified those elements which make a defining contribution to significance including facades and key internal spaces. Areas of less significance were identified as areas of potential development. This includes improved club facilities, hotel and apartments. The uplift allows the club to continue to function on the site. Social significance is a large part of this site. The economic uplift through the vertical extension allows the funds to preserve the facades and the key internal spaces.

These projects establish compelling precedents for the appropriate interventions to significant buildings to protect those aspects that make a defining contribution to significance, to intervene in those areas that make a lesser contribution with a view to reinvigorating the buildings to continue to be relevant and play a useful role in the urban landscape.



Figure 1 – Approved addition to Education Building on Bridge Street.

Source: MAKE architects



Figure 2 – 65 – 77 Market Street. David Jones store addition.

Source: FJMT



Figure 3 – Addition to City Tattersalls Club, Sydney.

Source: ArchitectureAu

Modify the proposal to avoid intrusions that impact and cause loss of significant façade.

It is important to restate that there is no proposal for any physical works at this stage, and the detailed design development considerations should not prohibit the progression of the rezoning application provided that the overall principle of interventions into this building are acceptable.

Intervention, of the nature that is indicated in the reference scheme, is acceptable in the context of this building as there is a clear hierarchy of elements on the site. The significance is vested almost entirely in the facades (excluding the substantially modified east façade).

The reference scheme has been developed with the explicit intent of avoiding loss of significant fabric, utilising the area to the east of the building for the core and concentrating change to the heavily

modified eastern façade. In addition, the scheme seeks to return significant elements back to the site including the original roof form which was historically visible behind the parapet.

Any structure to the south of the existing southern façade is as far as possible to be designed with transparent materials and with void spaces to ensure a significant portion of the original facades, in particular the southern façade, can be interpreted from the public domain.

The HIS acknowledges that the eastern tower core will partly obscure views to the highly modified eastern façade of the former Parcels Post building from the Inwards Parcels Shed. However, the interventions to this area are assessed to be acceptable for the following reasons:

- The façade has been extensively altered and no original fabric is discernible except at the northern and southern ends of the facade. Further, the eastern façade was originally a simpler façade. Parcel lifts were introduced in c. 1915 and a later extension was constructed c.1969 (and was subsequently removed – refer image below). The majority of the façade therefore has been modified or reconstructed. Some reconstruction works following the removal of the 1969 addition were undertaken inappropriately and are now failing. By 1993 the eastern façade was in a severely dilapidated condition as shown in Figure 7 below. Styrofoam filled vinyl embellishments were installed on the east elevation to replicate the appearance of carved sandstone but have been substantially compromised by local birds. A number of windows to the east façade have been replaced with aluminium windows. With regard for the extent of change to this façade and the relative level of significance it is appropriate that intervention is concentrated to this façade.
- The façade will remain partly visible. Specifically, the reference scheme does not obscure the return at the northern end, that which is most visible from Railway Colonnade Drive. This would ensure that the form of the building overall remains legible and retains a connection with the Inward Parcel Shed through a common early character.
- There is an exciting opportunity in this area between the former Parcel Post Building and the Inwards Parcel Shed to facilitate public congregation between the two through public domain improvements which would be supported through the development of the sub precinct generally. This is an improvement on the current utilitarian condition which does not encourage public access (noting that it is only privately accessible for hotel guests and gym). Interpretation could be considered in this area to celebrate the historic functional connection between the buildings.

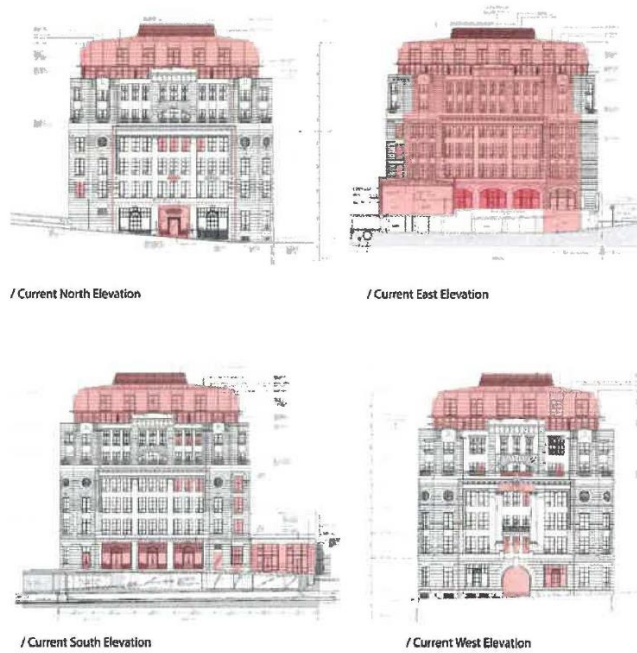


Figure 4 – Previous alterations to the former Parcel Post Building facades shown in red

Source: FJMT



Figure 5 – 1960s Annex to eastern façade.

Source: TOGA

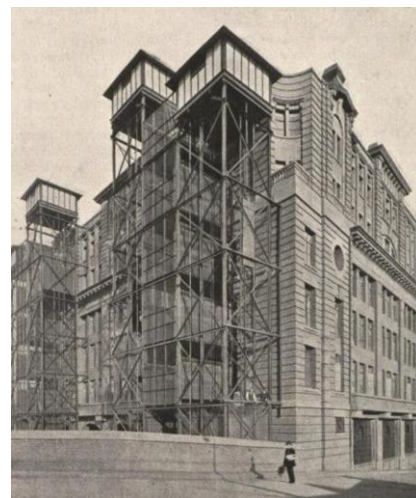


Figure 6 – Architectural Disfigurement, the New Parcels Post Office, at Sydney Railway Station. The above is a glaring example of the inconsistency of Government methods. A public building, having a fine stone façade, costing thousands of pounds, is turned into an eyesore by the addition of shoddy external lift construction

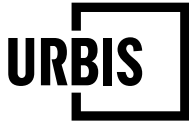
Source: Building, Vol 17 No 98, 12 October 1915, p59
Building, Vol 17 No 98, 12 October 1915, p59



Figure 7 – 1993 Severely dilapidated eastern façade.

Source: TOGA

In accordance with the above, while some impact is acknowledged, the impacts do not compromise an understanding of the original building and the connection between it and the adjacent site. The reference scheme capitalises on the area of least significance on the subject site allowing development to be in line with the anticipated future character established by the previous rezoning while allowing as much visual curtilage around the more intact facades as possible.



As stated throughout, a design excellence competition and the detailed design of an SSDA scheme will provide a continuing opportunity to finesse the public domain treatment, setbacks and interface treatments. This will be subject to ongoing heritage design advice and comprehensive assessment as stipulated in the Heritage NSW response.

HERITAGE NSW

Heritage NSW provided a series of observations regarding the site in its existing state as well as comments/observations on the proposal. A response to only the latter has been included below. Consolidated responses are provided where appropriate.

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 positive evolution of the city. The Council recognises however that the large scale towers will result in adverse visual impacts to the Central Railway Station site, in particular, as it does not relate to the predominant scale, density and grain of the significant built form, the fabric of the SHR-listed building elements, and cultural landscape context.

The proposal will also have obvious impacts to the setting, character and landmark qualities of the former Parcels Post Office building given the scale of change to the Western Gateway sub-precinct site. This underscores the importance that key heritage values, elements, and views and vistas remain central to any redevelopment of the area.

In-principle support of uplift in the precinct is noted.

The change in character in the precinct is noted. However, this proposal must be considered not only in the context of the other two proposals progressing for high density development in Block C but in the context of the renewal of the Central Precinct and more broadly in the context of the tower cluster sites as part of the Central Sydney Planning Strategy, one of which is located directly to the west of the site (noting that it does not include the site). It therefore must be considered that regardless of the subject project, the former Parcels Post building and surrounding fabric of significance will inevitably co-exist in the broad context of density greater than that which exists today.

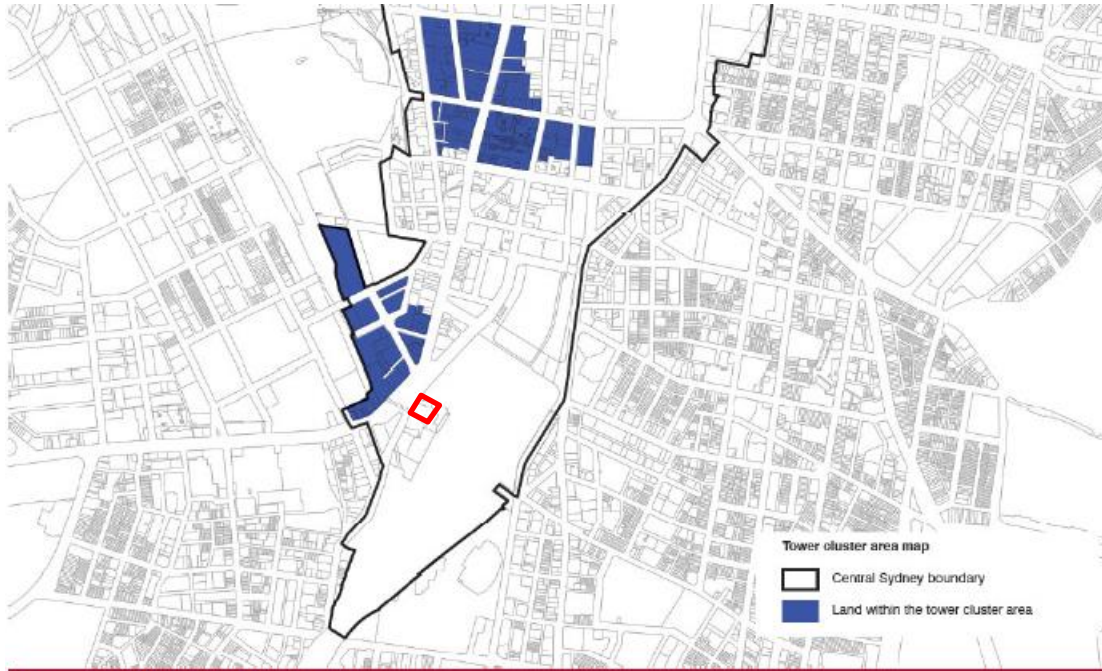


Figure 8: Tower cluster area map

Figure 8 – DCP tower cluster areas map showing subject site outlined red.

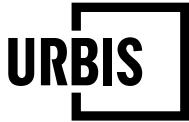
Source: Sydney DCP 2012

It is noted that the abovementioned tower cluster does not contain state heritage items as some Tower Clusters to the north of the City do. However, it does include several locally listed items which like the above will therefore exist in the immediate vicinity of higher density in the future. Further, the latest version (December 2020) of the Draft DCP (Refer Section 5.1.3.1) includes provisions to facilitate the appropriate implementation of further density above heritage items in Tower Cluster Zones. These provisions build on an established precedent of additional bulk above State heritage items including at the Education Building (discussed above) and at the Primus Hotel on Pitt Street.

Thus, is the nature of a developing city, during a phase of transformational growth. Historically, Central Station was once one of the most prominent buildings in the city when this area was more sparsely occupied, the Station is not anymore, even in its immediate context. However, it is still appreciable due to the treatment of the public domain setting and principal view lines retained.

As demonstrated in the analysis undertaken by FJMT the extension has the potential to retain the visual prominence of the building, and the legibility of its composition, architectural style, form and features. The most significant façades of the building are given prominence by the nominated setback and curtilage controls outlined in the building envelopes and as supported through the Draft Western Gateway Design Guide.

It is understood that this draft SEPP Report does not seek consent for the indicative reference scheme and that any future development within Block C will be subject to a competitive design process and subsequent Development Application and assessment process. It is recommended that ongoing consultation and input from Heritage NSW is undertaken as part of this process.



The consultation begun with Heritage NSW as part of this project will be ongoing through the competitive design process and design development for the Development Application.

Building Height

The proposal includes amendment to the maximum building height controls within Block C to a new maximum height of RL 211.9 metres AHD. This represents a significant increase in the allowable height of development of the site.

The Heritage Council understands that the proposed maximum building height amendment for this site will enable development that visually impacts the landmark former Parcels Post Office building. New development is unlikely to retain the predominant scale, density and grain of the existing built environment and context of the SHR-listed sites.

As discussed above, the increase must be contextualised within the Western Gateway sub precinct and the Broader Central Precinct. Both Blocks A and B within the Western Gateway sub precinct are subject to approved rezonings which achieve a similar height to that proposed herein. Blocks A and B have a similar relationship with Central Station as the subject site. Block A in particular, which comprises an item which forms part of the Central Station SHR listing, is located directly adjacent to the station. Block A is located between the station and the subject site. The cumulative impact has been considered by Urbis.

The proposed maximum planning envelope on Block C results in a slender tower on the site that maintains the existing former Parcels Post building as a prominent feature in the public domain. While the proposed planning envelope has a building height comparable to Block A and Block B, it is noted that the maximum GFA proposed for the site will necessitate a smaller building to be delivered on the site.

Significant documentation has been prepared by FJMT regarding the Urban Response in relation to heritage. As set out in the HIS, detailed in the VIA and demonstrated in the response to submissions prepared by FJMT the subject rezoning and tower envelope will have a minimal additional impact on the legibility of the setting or the heritage item when considered in the context of the massing on Blocks A and B. The proposed development is spatially well separated from immediate surrounding heritage items. The proposed development 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 encroach on visually documented public domain. In addition, the juxtaposed vertical scale of the slim, tall, tower form minimises visual impacts on views to and from heritage items within the immediate visual context including the Central Station Clock Tower.

We note that together, with the proposed Block A and B developments within the Western Gateway sub-precinct, the tower cluster will result in cumulative heritage impacts on the designed physical and visual prominence of the Sydney Terminal Rail and Central Railway Stations Group generally, including their landmark heritage qualities. However, the Heritage Council notes that these impacts could be somewhat reduced through high-quality design that puts the significant heritage values of the site at the core of the redevelopment.

Refer above for discussion of cumulative impacts.

The Heritage Council note that impacts could be reduced through high quality design. Urbis believes there is a significant opportunity to create a transformational development which will bring access, congregation and economy to this important heritage precinct.

Gross Floor Area

We understand that the proposed amendments to the gross floor area (GFA) will increase the maximum GFA from the current maximum 3:1 to 43,000m². This represents a significant increase in GFA which will be potentially difficult to respond positively to the existing form, bulk and scale of the former Parcel's Post Office building.

As demonstrated in the Response to Submissions prepared by FJMT the envelope has been rigorously tested to ensure that the significant values of the place and the surrounding precinct are able to be conserved in the context of increased GFA.

The reference scheme adopts a diagonal floorplate above the heritage building which creates an easy distinction between the prismatic form below and the vertical addition. The eastern structure/core zone below concentrates the most GFA to the façade that is of substantially lesser quality and intactness than any other façade.

Building Envelope

The proposed large-scale tower envelope over/adjacent this corner building has potential to diminish the identified landmark qualities and the setting of the building. It could also obscure whole facades of the building. Currently the entire building is legible from all sides which further emphasises its importance and prominence in the landscape.

Whilst it is noted that a 5-10 metre minimum setback from the northern and western facades is proposed for the tower structure envelope, to limit impacts to the prominence of the building when viewed from Railway Square and Sydney's potential Third Square, the proposed envelope will obscure the eastern and southern facades. This will impact the building's landmark qualities when viewed from Lee Street. The Heritage Council however feels that visual impacts could be mitigated if the proposed setback is substantially increased behind the northern and western facades and to preserve the integrity of views to the building. We would welcome detailed design to achieve this outcome.

As set out in the VIA and the Response to Submissions by FJMT the retention of the landmark qualities of the former Parcels Post Building has been a driver of the envelope testing. The well-considered massing concentrates mass to areas of less significance. Notwithstanding, there is some recognised impact on the qualities of the building. This project however has its genesis in a broad strategic vision for the precinct which acknowledges the need to reconcile heritage precincts with transformational change.

The setback analysis provided by FJMT provides a comparison of alternative setback controls based on the existing provisions of the Sydney Development Control Plan 2012 and the proposed Design Guide. Additional setbacks behind the full extent of the northern and western facades would undermine the ability for future development to achieve a maximum 1,300sqm floorplate (GBA) which is a threshold issue for the development. This is outlined further in the Town Planning response. The proposed setbacks and planning envelope do not preclude the ability for detailed designs to increase setbacks from these facades where achieving other criteria in the Design Guide and project requirements, given there is a degree of flexibility in the building envelope to achieve design excellence.

For the reasons set out in this report it is considered that the impacts generated by the proposal would be minimal in the context of those generated by the earlier rezoning of the Blocks A and B of the Western Gateway sub-precinct. They would be mitigated by the strategic massing and as acknowledged by the Heritage Council can be further reduced through high quality design that will result from the detailed design phase as noted.

The former Parcels Post Office building is historically significant for its association with the development of the NSW rail and postal services in the early 1900s. The location of the building adjacent to the station reflects the importance of parcel distribution by rail. The building worked in conjunction with the former Inwards Parcels Shed and platforms in the western yard precinct. It is critical that these physical, functional and visual connections are retained and interpreted, and not obscured.

Detailed consideration should be given to the form of any approved building in this sensitive environment, so that it respects the heritage values, character, form, proportions and setting of the existing heritage imp. In our mind, this includes retention of visual and historic connections between the historic building and Central Railway Station and that any new build seeks to minimise, where possible, penetrations and disruption of spaces and historic fabric that talk to the building's former function.

The functional connection between these buildings is no longer possible. However, it is agreed that a Heritage Interpretation Plan (coordinated with Block A) would be of benefit in communicating and celebrating the historic connection between the places.

As described above a visual connection between Central Station and the former Inwards Parcels Shed and former Parcels Post building would be maintained through the retention and conservation of strategic elements.

Similarly, as described above there is ample opportunity to confine interventions to fabric of lesser significance given the extensive alterations that have taken place.

It is noted that the proposed envelope extends 16 metres into Henry Deane plaza. It is unclear how this will impact the prominence of Marcus Clarke tower when viewed from the east/west connection across Central Precinct. Further visual studies should be undertaken to ensure the retention of views to the central tower of the significant Marcus Clark Building.

A view connection will be possible through the implantation of a combination of transparent materials (such as glass) and atrium/void spaces (per the revised Western Gateway Design Guidelines outlined in the section below), to the Marcus Clarke building however some impact on this visual connection is acknowledged.

The requirement for the concentration of mass in this area is derived from the intention and instruction throughout the iterative Design Review Panel process to reduce impacts on Central Station and Railway Square generally. The reference tower form retains a balance between a number of factors and importantly reduces visual impacts as much as possible on the primary north and west façade of the Parcels Post building and the high significance setting to the north.

Views towards Devonshire Street are identified to be of less importance and therefore the devices to retain visibility such as the glass atrium are appropriate in retaining the value of these views. Opportunities for retention/celebration of these views will be further investigated at detailed design stage.

Draft Design Guidelines

Urbis has reviewed the proposed amendments to the Draft Design Guidelines Western Gateway Sub-Precinct and included any notes below.

Heritage NSW Proposed Amendments	Response
<p>2.1 Desired future character</p> <p>The Western Gateway sub-precinct will:</p> <p>(a) Create a new and exciting ‘destination’ at the southern end of Central Sydney</p> <p>(b) Form an important sub-precinct to the broader Central Precinct, including an entrance to the planned future Over Station Development</p> <p>....</p> <p>(h) Be characterised by a built form that embraces and celebrates the area’s historical significance, responds sympathetically to the existing visual, spatial, and physical character of the place and enables the retention and adaptive re-use of key heritage items.</p> <p>....</p> <p><i>(n) Embeds the Aboriginal and Non-Aboriginal historical and cultural values of the place (including intangible values) in a holistic and integrated way through a Heritage Interpretation strategy for the entire precinct identifying key themes, stories, social values, interpretive opportunities, measures and locations as an integral component of creating a unique and exciting destination. To assist with this task, the project team for Block C are encouraged to reference the GANSW ‘Connecting with Country’ framework released November 2020.</i></p>	<p>The existing visual, spatial and physical character of the place is changing significantly as a result of the proposed changes to the Central Precinct and the CBD more broadly. Assessment against a point in time ‘existing’ context is not considered appropriate in this changing, and dynamic context.</p> <p>The Developer for Block C agrees with this suggestion; however it is noted that the proposed development for Blocks A and B affected by the Draft Guide may be impacted by this proposed change. Additional consultation requirements proposed in accordance with the response to the PRP comments.</p>
<p>3.2.1 Heritage Objectives</p>	<p>No comments.</p>

Heritage NSW Proposed Amendments	Response
<p>(a) Development should demonstrate an understanding of, and appropriately respond to the visual, physical and spatial character of the place including items of heritage significance within the sub-precinct (and the broader Central Precinct) and ensure items of heritage significance and their heritage values (including intangible values) are maintained and celebrated to create a unique and exciting destination wherever possible.</p> <p>(b) Development should retain and re-use any assessed heritage significant heritage items, features, specific spaces and fabric of significance.</p> <p>(c) Development should enable the sensitive adaptive re-use of any assessed heritage significant heritage items, features, specific spaces and fabric of significance.</p> <p>(d) Development should respect as much as practicable the context, character and setting of heritage items, including connections with surrounding items, views and vistas.</p>	<p>As per the comment on the existing character of the place, the introduction of this objective places significant weight on the existing context, character and setting of the heritage item. Given the significantly changing nature of the precinct, this inclusion of this objective may undermine the achievement of the broader sub-precinct objectives.</p>
<p>Design guidance</p> <p>(1) A Statement of Heritage Impact is to accompany any future DA for new buildings within the sub-precinct and is to be prepared in accordance with the NSW Heritage Manual 'Statement of Heritage Impact.' It should demonstrate an understanding of the heritage and cultural values of the place and include consideration of the Western Gateway sub-precinct as a whole, and the wider Central Precinct.</p> <p>(2) Any future DA for new buildings within the sub-precinct is to be accompanied by an integrated Western Gateway sub-precinct Heritage Interpretation Strategy (co-ordinated with across the entire Central Precinct), that identifies opportunities for the presentation of the history of the site and surrounds. It is recommended that a program of Aboriginal ceremony be developed to re-awaken the landscape as part of the proposal. This should include Aboriginal and non-</p>	<p>No comments.</p> <p>While the Developer for Block C would agree with this suggestion, it is noted that DAs for development in the sub-precinct have already been lodged with DPIE and the City of Sydney. As such the application of this suggestion may not be possible.</p>

Heritage NSW Proposed Amendments	Response
<p>Aboriginal themes <i>such as living cultural practices, stories (including Stolen generation stories) , social values, interpretive opportunities, measures and locations</i> and present the findings of any desktop analysis of the likely archaeological significance of the site and the immediate surrounds. All documentation should be prepared in accordance with Interpreting Heritage Places and Items Guidelines.</p>	
<p>(3) Development should comprise of building forms and design treatments that give consideration and positively responds to heritage items within and immediately surrounding the sub-precinct <i>with specific consideration to the bulk, height and scale of the existing significant elements of the site, including its setting, context, streetscape, and visual and physical character of the locality.</i> The Statement of Heritage Impact that accompanies a development application should identify and assess any direct and/ or indirect impacts (including cumulative impacts) to the heritage significance of the buildings and elements within the precinct. <i>It should also provide an understanding of the place's heritage values and assess opportunities that arise from these.</i></p>	<p>As stated in earlier comments, the weight of existing context and character it problematic given the evolving nature of the precinct.</p>
<p>(4) Buildings should be constructed of durable and robust materials.</p>	<p>While the Developer for Block C would accept the deletion of this provision, it is understood that this provision is proposed to be retained in the Design Guide by TfNSW.</p>
<p>(5) Architectural detailing should provide a higher order of priority to the levels interfacing with the heritage items and adjacent public domain. <i>It should take an informed and strategic approach to form, colour, materials, and details and respond to the immediate context and character.</i></p>	<p>No comments.</p>
<p>(6) Development on Block A is to:</p> <p>a. provide a minimum clearance of 10.8m between the topmost point of the roof of the Former Inwards Parcel Shed and the underside of any tower generally in accordance with Figure 6: Separation Distances and Setbacks</p>	<p>N/A – not relevant to Block C.</p>

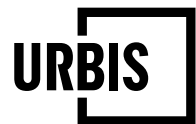
Heritage NSW Proposed Amendments	Response
<p>b. retain the simple form of the Former Inwards Parcel Shed, including the form and shape of the roof, an understanding of the bolted timber post and truss system</p> <p>c. incorporate a building design and materiality that appropriately responds to the Inwards Parcel Shed, the Former Parcels Post Office and Central Station</p>	
<p>(7) Development on Block B is to</p> <p>a. ensure the materiality and design of the podium responds to the scale and materiality of the surrounding built form character (e.g. Central Station, Mortuary Railway Station, Marcus Clarke Building and the Former Parcels Post Office, railway lines) and is designed to be visually distinguished from the towers above.</p>	N/A – not relevant to Block C.

Response to PWG Comments

The table below outlines each of the PWG Comments and where these are addressed in this letter.

PWG Comment	Response Reference
<p>The RTS notes the proposal is appropriate as it is consistent with the nearby tower cluster: The City’s most southern located Tower Cluster Area does not include Central SSP. In addition, this tower cluster area does not contain state heritage items and ensures no built form can occur in the airspace above local heritage items. Therefore, the City’s approach to heritage in tower cluster areas is different to what is proposed in this proposal.</p>	Page 10
<p>The City’s representation on the SDRP does not reflect an endorsement by the City</p>	Page 1
<p>The RTS notes the proposal is appropriate in the context of Block A and B. The fPPB proposal has a very different relationship to Railway Square and its context compared to the Atlassian and Dexus sites. As such the heritage considerations should be considered separately.</p>	This has been previously discussed on Page 11 of this document and further in Section 3.1.1 of the planning response.
<p>Overall, there is a lack of a strategic heritage approach to this precinct. The draft TZG Centre Precinct Heritage Framework</p>	Page 2

PWG Comment	Response Reference
<p>does not say that development in this precinct is appropriate and doesn't recommend any specific changes.</p>	
<p>The HIS does not assess any proposed form or envelope, no structural intervention or views and vistas from/to the building. Consequently, the Assessment of Impact is too general and not concrete.</p>	<p>The reasons why a more detailed structural assessment has not been undertaken at this stage are outlined at Page 3.</p> <p>The HIS has assessed views and vistas at Section 6.4. These will be further assessed at DA stage. This is further supported by the VIA.</p> <p>This HIS includes reference to the impact of the envelope facilitated by the Planning Proposal throughout Section 6.</p>
<p>The RTS does not appropriately address consistency with the draft Strategic Vision Principle 6 to 'establish a context-responsive built form approach that achieves a balanced distribution of height, density and scale'. The RTS should demonstrate how it is consistent with the is principle.</p>	<p>Discussed in Section 3.1.1 of the planning response.</p>
<p>Setback analysis is limited and does not appropriately respond to the issue raised by the Heritage NSW Submission which seeks greater setbacks. While the alternative approach tested allows for greater setbacks toward the north-eastern and south-western corners of the fPPb (increased from 5m to 10m) it has drastically reduced the setback from the north-western corner (21m to 14m). The RTS assumes that HNSW seeks a consistent 10m setback to the northern and western frontages (hence reduction from 21 to 14m at the NW corner). The RTS does not demonstrate that the exhibition issues relating to setbacks have been appropriately addressed.</p>	<p>Page 10</p>



CONCLUSION

We trust these responses assist in the assessment of the rezoning application. Please do not hesitate to contact the undersigned if you require any additional information.

Kind regards,

A handwritten signature in black ink, appearing to read "Stephen Davies". The signature is fluid and cursive, with a small dot at the end.

Stephen Davies
Director