

30 April 2020

Mr John Dawson
Deputy Development Director
Frasers Property Australia
Level 2, 1C Homebush Bay Drive
RHODES NSW 2138

John.Dawson@frasersproperty.com.au

Our Ref: 18-0703jdc1

**Re: Central Precinct Western Gateway Rezoning Proposal—Block B
Heritage Response to Submissions**

Dear Mr Dawson,

Background

The Western Gateway sub-precinct rezoning proposal was publicly exhibited by the State Government from 16 October 2019 to 27 November 2019. The rezoning proposal seeks to introduce a new land use and development control framework on land, identified as the Site (Block B), that is owned and controlled by Frasers Property Australia and Dexus Funds Management Limited (the Consortium), via long term lease.

In response to the public exhibition, a total of 94 submissions were received from individuals, community groups, local landowners and government agencies. In addition, the Precinct Review Panel (PRP) which forms part of the established governance arrangements for the rezoning proposal, issued a letter and addendum to Transport for NSW (as lead proponent) identifying the key issues it considered required clarification and further justification.

Several submissions received during the public exhibition process provided feedback in relation to heritage. The Consortium and its consultant team have considered all issues raised in submissions. This letter and attached table respond to the heritage related feedback, specifically regarding the Site, and should be read in conjunction with the Consortium's complete suite of Response to Submissions documentation.

Response to Submissions

We have reviewed the submissions of the Heritage Council of NSW and the National Trust of Australia (NSW) specifically as they relate to the Site (Block B) of the Western Gateway, for which we provided Heritage Design Guidelines and the Block B Heritage Impact Statement.

The Central Precinct (within which the Western Gateway is located) is undergoing rapid change. This change is aligned with the State Government's and the City of Sydney's collective vision for Sydney as articulated in the draft

Sydney Office

Level 6
372 Elizabeth Street
SURRY HILLS NSW Australia 2010
T +61 2 9319 4811
E heritage@gml.com.au

Canberra Office

2A Mugga Way
RED HILL ACT Australia 2603
T +61 2 6273 7540
E heritage@gml.com.au

GML Heritage Pty Ltd

ABN 60 001 179 362

Central Sydney Planning Strategy, Eastern City District Plan and Sydney Innovation and Technology Precinct.

Notwithstanding the above, future development of Block B can appropriately respond to the Western Gateway's heritage context if guided by the Heritage Design Guidelines and recommendations set out in the Heritage Impact Statement for Block B.

The Guidelines were developed by gaining a comprehensive understanding of place informed by site context analysis, primary research and existing conservation management planning of adjacent sites including Central Station Precinct and the former Parcels Post Office. This understanding was placed in the context of existing, draft, and anticipated controls—including the controls for the 'Railway Square/Central Station Special Character Area'. Points raised in the submissions include issues of context and response to the existing character and built form of the precinct. The Guidelines provide expressly for such issues and have been carried through to the Consortium's Urban Design Report which would ultimately inform design competitions and development applications that might follow any amendment of the planning controls. The nine Guidelines are:

1. Set back development on the Site [Block B] from the former Parcels Post Office to respect the heritage item's setting, mindful that the former Parcels Post Office was designed to be viewed in the round.
2. Reference the principal datums and relative scale of the former Parcels Post Office and its components and, particularly, its upper cornice. Development above the datum of the upper cornice should be either set back or have a vertical separation (for example through a recess). Built form on the Site [Block B] from ground to this datum should be expressed solidly, with that above being more lightly expressed.
3. Retain principal public domain views to the clock tower of Central Station from the south and west and consider longer views to the clock tower including those from Redfern Station on Lawson Street, from the intersection of Regent and Cleveland Streets, from Foveaux Street and from Wentworth Avenue.
4. Use high-quality materials that are sympathetic to the historic setting of Railway Square Precinct should be used in new development of contemporary design. These may include materials characteristic of the Railway Square Precinct, such as brick and limited use of sandstone and steel, but may also include contemporary materials.
5. Assess the additional shading on Mortuary Station and its gardens and Prince Alfred Park to ensure the heritage impacts upon them are minimised.
6. Respect the continuity of the ground plane, existing levels and transitions of Lee St and connections to Railway Square and the Precinct.
7. Protect the alignment and spatial envelope of the former Goods Line and explore opportunities to reintegrate it into movement networks.
8. Develop an Interpretation Strategy and incorporate interpretation into redevelopment of the Site [Block B].
9. Integrate these guidelines into site-specific development controls whether by amendment to the Sydney Development Control Plan 2012 or a discrete development control plan for the Site [Block B] and/or its wider Railway Square/Central Station precinct.

Conclusion

We believe these guidelines provide sufficient guidance both to mitigate heritage impacts at the Site (Block B) and to exploit opportunities for the reinforcement of the heritage context and story-telling in the public domain.

We attach a detailed response to the matters raised by the Heritage Council of NSW and the National Trust of Australia (NSW) in relation to the Site. Please contact me or Don Wallace on (02) 9319 4811 should you require additional information or clarifications.

**Yours sincerely,
GML Heritage Pty Ltd**



**David Logan
Partner**

Attachment:

Responses to submissions on Draft Strategic Vision and Western Gateway Rezoning (Heritage—Block B)

RESPONSES TO SUBMISSIONS ON DRAFT STRATEGIC VISION AND WESTERN GATEWAY REZONING (HERITAGE—BLOCK B)

ID	SUBMITTER	RELEVANT ISSUES RAISED	RESPONSES
	Heritage Council of NSW	<ul style="list-style-type: none"> • It is important that a consistent approach is taken in the design of each area to ensure these precincts are still able to be read as part of the one SHR site and its predominant use as a railway station i.e. through the use of form, placement, scale, materials, signage, and interpretation etc. Materials, textures and colour ranges often give a building, site or precinct a consistent character, with common details establishing neighbourly resemblance. • Proposed increases in building heights in Western Gateway represent a significant increase in the allowable height of development. • Proposed heights do not respond to the character of the area and will result in adverse visual impacts to the Central Railway Station site. • Building heights do not relate to the predominant scale, density 	<ul style="list-style-type: none"> • GML Heritage’s Heritage Impact Statement <i>Western Gateway Sub-Precinct Proposal: Block B, 14–30 Lee Street, Haymarket NSW 2000 Heritage Impact Statement</i> (Block B HIS) formed Annex J of Appendix E of the exhibited documents for the Central Precinct Western Gateway Rezoning Proposal. • Section 6.0 of the Block B HIS establishes Heritage Design Guidelines intended to mitigate potential adverse impacts through measures such as setbacks, physical separation of taller components, character and materiality, and interpretation and stories—among others. As Block B does not contain any individually listed building/items (at either local or State level) and has no inherent heritage value, the Heritage Design Guidelines provide guidance to the future Block B development to address issues of setting and protection of adjacent and nearby heritage items. The nine Guidelines are discussed in section 6.0 of the Block BHIS and recommended for implementation in the conclusion of the report in section 9.0. • The Western Gateway Sub-Precinct is comprised of three development blocks and is, itself, part of the broader Central Station precinct. It is appropriate that each sub-precinct within the broader Central Precinct be subject to the same heritage assessment methodology. However, the heritage outcomes will differ for each Sub-Precinct (and within them) as development within each area ought to respect the different settings and interface conditions at each area thus providing a localised response to heritage items and their settings. The guidelines are intended to achieve these

		<p>and grain of the existing building fabric and heritage items.</p> <ul style="list-style-type: none"> • Consideration should be given to reducing maximum building height envelopes. • Significant increase in FSR does not respond to the existing bulk and scale of surrounding area. • Removal of the site from the Railway Square/Central Station Special Character Area will allow any new development to bypass principles which seek to: <ul style="list-style-type: none"> ○ Maintain a high level of daylight access to Railway Square and its associated open spaces by restricting building height ○ Maintain and enhance the visual prominence and landmark significance of the clock tower of Central Station in the views and vistas from various points, particularly along Broadway and George 	<p>localised responses. A homogenous approach to materiality would be contrary to the existing diverse character of the precinct.</p> <ul style="list-style-type: none"> • The heritage design guidelines have been integrated into Block B's Urban Design Report as exhibited (Annex A of Appendix E) within section 3.1's Strategic Principles. • The Block B HIS considers building heights and provides guidance on how to respond to the existing context. The proposed height of Block B is consistent with both the City of Sydney's solar access planes and the proposed view access plane for Central Clock Tower defined in the July 2016 Planning Proposal for Central Sydney. • The heritage guidelines make provision for physical and visual separation between development on Block B and the former Parcels Post Office building expressly. The guidelines recommend referencing the 'edges' of Railway Square and characteristic height datums and materiality. • On the issue of the Railway Square and Central Station Special Character Area, it is important to note that Block B is currently explicitly excluded from the Special Character Area listing. Nevertheless, the Block B HIS gives particular consideration to the principles for the area and these have informed the Heritage Design Guidelines and, in turn, the Urban Design Report's Strategic Principles. • The importance of stories and interpretation is emphasised in the Heritage Design Guidelines. The development of an interpretation strategy is recommended as an important first step. The realisation of heritage interpretation will ultimately be a matter for future development applications, consistent with conventional processes. It is understood that Transport for NSW is developing a precinct
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		<p>Street, when approaching or departing the city.</p> <ul style="list-style-type: none"> ○ Maintain and enhance vistas to Central Station <p>New building elements should look to enhance heritage setting, provide for uniform connect.</p> <ul style="list-style-type: none"> ● Consider high-end heritage interpretation. Cumulative impact of development on heritage cultural landscape must be integral to planning decisions. 	<p>based interpretation plan or strategy. A specific Block B interpretation strategy could inform that precinct plan and should be coordinated with it.</p> <ul style="list-style-type: none"> ● Additional floor space and height provisions are consistent with the State Government’s and City of Sydney Council’s strategic vision and objectives to facilitate high-tech employment uses to support the Sydney Innovation and Technology Precinct and the city’s global competitiveness. It is acknowledged that intensification will alter the settings of adjacent heritage buildings. Compliance with the Heritage Design Guidelines and the design objectives in the draft Western Gateway Sub-Precinct Design Guide which supports the rezoning proposal will assist in mitigating these impacts. ● The draft Central Sydney Planning Strategy proposes to position the southern edge of the CBD for floor space and height uplift. Planning for the Central Precinct including the Western Gateway Sub-Precinct—and Block B in particular—considers this changing context. The Heritage Design Guidelines, combined with the draft Western Gateway Sub-Precinct Design Guide, seek to manage change and retain adequate heritage settings within this changing context. ● Finally, Section 8.0 of the Block B HIS considers the impact of the Consortium’s proposal generally and for individual impacts on 11 heritage items in the Central Precinct context. The Block HIS concludes by recommending ongoing impact assessment and testing of designs against the Heritage Design Guidelines.
Organisations			
69086 69091	National Trust of Australia (NSW)	<ul style="list-style-type: none"> ● Concern about impact that WG rezoning will have on the former 	<ul style="list-style-type: none"> ● The National Trust’s submission relates to the Western Gateway Sub-Precinct as a whole, rather than to Block B specifically. It is

		<p>Parcels Post Office, Inward Parcels Shed and Marcus Clarke Building.</p> <ul style="list-style-type: none"> • Any proposal for bulk and height in this area must have an impact on heritage significance of the adjacent items. • Prioritising initial development on this site, rather than in the Rail Yards sub-precinct, would seem short-sighted. • Proposal to remove the WG sub-precinct from the Special Character Areas Map in SLEP 2012 is very disturbing. Special Character Area map should be amended to include all three blocks (i.e.: include Block B which is currently excluded). • Proposed building heights completely out of context with surrounding area, including the Clock Tower and broader Sydney CBD as there are currently only nine towers over 200m. Design controls cannot negate height impact. 	<p>acknowledged that proposals for intensification of bulk and height in this area will have some impact on the settings of adjacent heritage buildings. Potential impacts on the settings of heritage items in the vicinity of Block B are addressed in the Heritage Impact Statement prepared by GML Heritage - <i>Western Gateway Sub-Precinct Proposal: Block B, 14–30 Lee Street, Haymarket NSW 2000 Heritage Impact Statement</i> (Block B HIS). Compliance with the Heritage Design Guidelines contained in the Block B HIS combined with the draft Western Gateway Sub-Precinct Design Guide that supports the Rezoning will assist in mitigating these impacts.</p> <ul style="list-style-type: none"> • Reference should also be made to the specific issues addressed above to respond to the Heritage Council of NSW submission which provides further detail on particular heritage related matters.
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