

29 January, 2021

NSW Department of Planning, Industry and Environment

Submitted online

***Draft Strategic Vision for the Central State Significant Precinct and
Western Gateway Rezoning Proposal***



Railway Station & Parcels Post Office Central Square Sydney (Source: National Museum of Australia, 1986.0117.5688)

The National Trust makes the following submission on the draft rezoning proposal for Block C of the Western Gateway sub-precinct of the Central State Significant Precinct. The proposal seeks to amend the Sydney LEP 2012 to enable development above the Parcel Post building (the Adina Hotel). It is stated that “the new planning controls would also allow for a new north-south thoroughfare and an improved public plaza linking Railway Square with the new public domain in the Western Gateway.”

Central Station is a building of the highest architectural importance to Sydney, and its construction was directly responsible for the surrounding environment. When the National Trust listed the *Central Station / Haymarket Urban Conservation Area* in June 1981, it noted that:

“(when) the railway terminus shifted from Redfern to Central, and Railway Gates (Railway Square) became a major station for trams and cabs as well. Banks, department stores, theatres, office buildings, public and institutional buildings, and the vast railway structures themselves, imposed on the district the character it

largely retains today. This is in great measure also due to the impact of the railways: the area declined with the building of the city circle and harbour crossing, 1926 to the mid-1930s, which encouraged a shift in business activity northwards.”

Central Precinct Renewal Program’s Draft Strategic Vision for the Central State Significant Precinct and Western Gateway Rezoning Proposal. It is noted that the stated aim of the program is to “create a precinct with a real sense of place, which connects into surrounding neighbourhoods, and draws on the character and heritage of this landmark location.”¹ This is an admirable aim, and it is hoped that measures are put in place to ensure that this is indeed the outcome of this massive project.

There is little doubt that the areas surrounding Central Station can benefit from some renewal projects, and the National Trust supports aims to revitalise this important area of the city. The Trust are however concerned with the way this is done, and encourage that the important and historic existing components of the place are seen as enablers of, rather than barriers to, a place with a unique urban identity.

The Parcels Post Office Building, constructed in 1913 and designed by the NSW Government Architect is a key contributing item to this precinct. It is listed as an item of local heritage significance under Schedule 5 of the Sydney Local Environment Plan 2012, (Item 855) and is also included within the Central Railway Station State heritage listing (Sydney Terminal and Central Railway Stations Group, SHR 01255). The building was individually listed by the NSW National Trust in 1979. The Trust noted in its reasons for listing:

“This uncompromising design results in a building capable of competing with, and enhancing, the formidable area of Railway Square to the west and, to the north, agreeing particularly well in style and scale with Central Railway Station. These two buildings, with the enclosed park, planting and railings and the monumental Pitt Street colonnade beneath, form a particularly good and imposing example of Edwardian urban design.”

The proposal which is currently being put forward, would have a severe negative heritage impact on this building and its wider setting. This “particularly good” example of past urban design is set to be replaced with an excellent example of the worst in current planning practices – where a new tower will literally overhang a unique historic building and overshadow a public area.

The Parcels Post building was specifically designed in response to its location as a building to be seen “in the round”. It is a sophisticated, sculptural, Mannerist design and makes an important contribution to its setting on all sides, and in its current state it responds to the Henry Dean Plaza and Railway Square in particular. These are important elements of its curtilage, and setting. The current proposal will relegate the Parcels Post building to a mere postage stamp at the base of this new tower.

The National Trust is opposed to the building of a tower over and above this important building. We disagree with the Heritage Impact Statement (prepared by Urbis, November 2020) which states (p.1) “the proposed tower envelope is partly built over the heritage item and partly over the plaza to the south... this offset form of separation and suspension creates a physical and visual curtilage for the former Parcels Post building and enables the building and tower to be read independently, with the heritage item maintaining its prominence in the streetscape and views.” It is difficult to understand

¹ <https://www.transport.nsw.gov.au/projects/current-projects/central-precinct-renewal-program>

how an addition of over 200m which overhangs the building creates a positive visual and physical curtilage to this important building or allows it to maintain its prominence in the streetscape.

The argument in the Heritage Impact Statement (p.1) that “the robust nature of the building” allows it to accommodate such an intrusion is not an argument the National Trust would support. It is indeed the robust and dignified qualities of this important building that the Trust seeks to maintain.

Sydney is a city that needs to do better than simply “retain” this heritage building. We need to ask ourselves what are we retaining it for? The broader precinct plans for the Central Station redevelopment present many fantastic opportunities to engage with the heritage qualities of the area. The successful works at Central Park only serve to highlight the positive ways in which heritage conservation and activation can improve the amenity of a redeveloped area and build on (and indeed create) a unique character for a place.

At the time of its construction, Sydney’s Central Station was, in the words of the Draft Strategic Vision, “inspired by the grand classical stations of Europe.”² The redevelopment of the site should also be influenced by the best of modern planning strategies and station redevelopments. The massive renewal of London’s Kings Cross St Pancras Station has been achieved without the need for multiple high-rise buildings, and the existing heritage buildings within the precinct have been carefully and thoughtfully remodelled and reinvigorated – without the need to add a tower on top. Even Tokyo Railway Station retains a dignified setting despite the development pressures of that city. We hope that the redevelopment of Sydney’s Central Station can be a model of successful renewal on a scale that aligns with the important heritage buildings and connections of the place. The Trust supports the Preliminary Precinct Plan aims regarding Built Form and Heritage that the precinct should:

- “Establish a context-responsive built form approach that achieves a balanced distribution of height, density and scale”
- “Reinforce the iconic architecture of the Sydney Terminal building, former Parcels Post Office and Mortuary Station as important and defining character elements in the streetscape”
- “Establish a sensitive built form response to heritage interfaces, including retaining a sufficient heritage curtilage and separation to potential future development and visual connections to key heritage items.”
- “Ensure that any proposed built form does not reduce the amenity of existing public open space, particularly Prince Alfred Park”³

The proposal is at odds with most of the expressed visions for the Central Precinct, in particular the aims to “establish a **context-responsive built form approach** that achieves a balanced distribution of height, density and scale” and “reinforce the iconic architecture of the Sydney Terminal building, former **Parcels Post Office** and Mortuary Station as **important and defining character elements in the streetscape.**” Maintaining the view of the Parcels Post Building from the east by simply floating another building above it is not a good heritage outcome.

² Central Precinct Draft Strategic Vision (October 2019), p.15

³ Central Precinct Draft Strategic Vision (October 2019), p.28

The visual montages provided do not demonstrate the true impact of the proposal on this building:

ANALYSIS OF PHOTOMONTAGES

VIEW 13 VIEW FROM LEE STREET SOUTH OF RAILWAY SQUARE (ADDITIONAL VIEW REQUESTED BY THE CITY OF SYDNEY)

EXISTING VIEW

The view is an axial view from Lee Street south of Railway Square approximately 100m south of the site. The view is predominantly constrained to the road corridor and includes the Railway Square shade structure on the left hand side, Adma building and parts of Henry Deane Plaza. The existing view composition includes the subject site and is terminated by the former literary office and the commercial buildings beyond.

PROPOSED VIEW INCLUDING THE REFERENCE DESIGN AS MODELLED

The Reference Design introduces a new tall, slim tower form into the mid-ground/view composition. The slim tower form proposed as indicated by the Reference Design is spatially separated from existing buildings and approved tower envelopes that are clustered within the Central Precinct. The existing built form blocks all views to Central Station and the Clock Tower as such the proposed tower envelopes have no impact on views to these items. Taller built form located in the Central Precinct will be visible in the context of the Central Precinct Tower cluster and as such will contribute to the contemporary visual landmark that is intended for Haymarket and the wider visual setting.

The proposed Reference Design sits within the proposed Tower Envelope and if constructed will not block views to or between heritage items, does not block access to scenic features or resources beyond the site and will predominantly block areas of open sky.

Table 14 Table of Visual Effects

EXISTING RATING OF VISUAL CONTEXT	VISUAL EFFECTS OF THE REFERENCE DESIGN ON THE EXISTING VIEW
Scenic quality and visual character - Low-medium	Low - medium
View Place Sensitivity and Viewer sensitivity - Low-medium	Low
View composition - Low-medium	Medium

EXISTING VIEW



Existing view looking north from Railway Square along Lee Street

PROPOSED VIEW



Proposed view view looking north from Railway Square along Lee Street

KEY PLAN

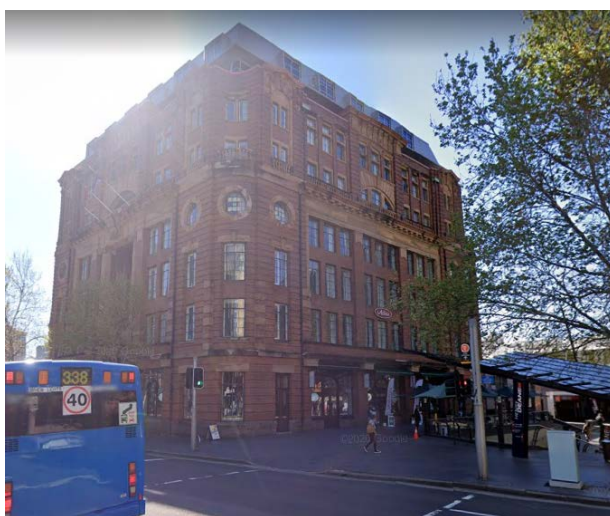


LEGEND

- Neighbouring Proposed & Approved Development Envelopes
- Proposed Reference Design

View analysis as presented, not indicating the true visual impact on the actual subject building facade (Source: Visual Assessment Report, Urbis, November 2020, p.24)

The above illustration shows the building already obscured by trees. A more useful view assessment would be from Railway Square itself, or from the Devonshire Street tunnel entry. The actual visual impact that the proposal will have can be garnered from the contrasting images below. Such studies should form part of this assessment, not specifically selected views of the building already obscured by trees and other structures.



Actual view of the Parcels Post Building (left) and the actual impact on the building indicating that the entire southern elevation will essentially be obscured (Source: Google Maps with National Trust overlay (left) and Visual Assessment Report, Urbis, November 2020, p.24 (right))

The Trust notes section 3.2.1 Heritage of the Draft Design Guide has the following objective:

“Development should appropriately respond to items of heritage significance within the sub-precinct and ensure items of heritage significance are maintained and celebrated wherever possible.”⁴

The Trust does not accept that this proposal is a good example of maintaining and celebrating the heritage significance of the Parcels Post building, at one of the great historic railway stations of the world.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'David Burdon', with a long horizontal flourish underneath.

David Burdon
Director, Conservation

⁴ Draft Design Guide Version 1 | Western Gateway Sub-precinct, p.17