

4 October 2022

Transport for NSW
231 Elizabeth Street
Sydney NSW 2000

Submitted online: <https://pp.planningportal.nsw.gov.au/central-ssp>

The National Trust object in the strongest possible terms to the Central State Significant Precinct Rezoning Proposal in its current form. We agree with the Statement of Heritage Impact (p.164) that *“Overall, the proposed masterplan development would have a cumulative major and detrimental impact to the significant cultural landscape of the Central Station Precinct.”*

If this proposal is accepted in its current form, and it is seriously accepted that this NSW Government project achieves its stated heritage principle to *“maintain the State heritage-listing of Central Railway Station Sydney Terminal Group and its individual components,”* then the entire rationale for heritage listing in NSW must seriously be reconsidered.

This proposal will:

- Have a major detrimental impact on the heritage values of the *“Sydney Terminal and Central Railway Stations Group”* (SHR ID 01255), both within its curtilage boundary and its place in the wider city;
- Have a cumulative impact by diminishing numerous individual components that together create a complex system that is a key element of the place’s significance;
- Reduce the prominence of the Central Clock Tower through the proximity of very tall towers and ensure it is not visible from any country and intercity platforms;
- Destroy a key arrival sequence to the City of Sydney through the construction of the *“North OSD”* by building a deck that will make all terminating platforms underground spaces devoid of light and air;
- Likely ensure that steam locomotives can no longer use Central Station terminal platforms;
- Separate Mortuary Station from the wider rail precinct and shade this building from the north;
- Erect a series of buildings that will form an effective wall between Surry Hills and Ultimo/Chippendale, instead of seeking to re-connect these areas in a way that responds to their existing form and scale;
- Propose changes to the Sydney LEP 2012 Height of Buildings Map that will exceed the prescribed airspace limitations, requiring consultation and confirmation from the relevant airspace authority and Commonwealth bodies;
- Inexplicably include alterations to the planning controls for the Goulburn Street Carpark including a *“no height limit”* for that land;
- Fail to address many of the genuine deficiencies that exist at Central Station by creating an elevated plaza (the North OSD) that will be difficult to access and not effectively connected to the surrounding streetscape, particularly to the west.

The National Trust acknowledge that Central Station can and should benefit from comprehensive renewal, and genuinely would support appropriate efforts in this regard. The sheer scale of this proposal however, and its very real impact on arguably the most important railway station in Australia, means that any beneficial aspects of this present scheme will in themselves be compromised by the overall cumulative impact of the proposal.

This submission outlines our concerns.



The need for renewal and the case for change

It is important to note that the National Trust are not opposed to the renewal of Central Station, and there are of course many ways it can and should be improved particularly in relation to the way that it relates to its surrounding context.

When it was built, Sydney's Central Station was by far one of the largest public works ever undertaken in Australia. Described by noted architect Howard Tanner in the National Trust's own 1976 Heritage Register Listing as *"perhaps Walter Liberty Vernon's greatest design,"* it remains certainly the grandest railway station in Australia, and one of the largest sandstone buildings constructed in NSW. Peter-John Cantrill and Philip Thalys described it in their book *Public Sydney* (2013, p.162) as *"a major intervention of unprecedented scale"* and note that the clock tower was *"skillfully placed to align to many nearby streets including Broadway, Wentworth Avenue, and Pitt, Valentine, Albion and Foveaux Streets."*

The State Heritage Listing expands upon this urban dimension and notes that the Sydney Terminal was *"the only major building of this period in Sydney where the urban setting was consciously designed to complement, and provide views of the main structure."*¹ This included a garden and "carriage loop" for traffic approaching from Railway Square that has been described by James Broadbent as *"an integral part of the precinct."*²

From the beginning however, Central Station was not without its deficiencies, and the station was scrutinized in the 1909 *Royal Commission into the Improvement of the City of Sydney and its Suburbs*. Since that time there have been numerous proposals for the precinct, many of which have focused on "healing the scar" by building above portions of the railway tracks to once again link Surry Hills, Redfern, Chippendale, Ultimo and Haymarket, and also addressing the difficult connections it has to the life of the city due to its being surrounded by parks on two sides.

The National Trust has, in our previous presentations regarding this project to Transport for NSW, the City of Sydney, and the Heritage Council of NSW, have highlighted the significant opportunities that exist within this site to re-connect these parts of the city by interpreting historical street patterns (such as Devonshire Street) and by responding to the surrounding urban context (including re-activation of Mortuary Station and what is now known as the Goods Line – two things that have been included in this proposal).

There are also significant opportunities to improve the historic building of Central Station itself, to truly place it at the heart of this precinct, possibly including completing the original intended form of the station through the building of an impressive glass roof over the terminus. This would be a fitting complement to some of the recent, exemplary, heritage restoration works to the building which have been widely praised, including the careful restoration of the former Interstate Booking Office (known as the "Melocco Room") on the Main Concourse, and the insertion of the new Sydney Metro project and its daylight-filled Northern Concourse by Woods Bagot and John McAslan and Partners.

Sydney's Central Station thus presents a significant urban regeneration opportunity for Sydney, and the site is certainly capable of great change, but as was noted by John McAslan himself in his recent visit to Sydney *"it can't be led by development alone, it has to be what is needed."*³ It is the opinion of the National Trust that this proposal is indeed development driven and misses significant opportunities within the precinct, a position apparently supported by Prof Elizabeth Mossop, Dean of Architecture at the University of Technology Sydney, who has said the proposal is *"driven by real estate, economic thinking, rather than city-making thinking"*.⁴

¹ <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=5012230>

² Broadbent, J., "Garden over central Railway Colonnade"- Addendum to National Trust Listing for Central Railway Station, 1981 (original listing by Howard Tanner, 1976)

³ Quoted in Financial Review article by Michael Bleby, "NSW plans to expand Tech Central with \$3bdeck over rail yard", June 22 2022

⁴ Rose, Tamsin, The Guardian online, 01 October 2022 <https://www.theguardian.com/australia-news/2022/oct/01/nsw-redevelopment-plan-poses-very-real-threat-to-sydneys-central-station-national-trust-says>



The issue at stake here is that the many worthy aspects to this proposal unfortunately become lost in the overall negative impact it will have on this State Heritage Listed precinct. Much of the documentation presented with this proposal points to the ways that positive heritage and urban outcomes can be achieved, but this advice has often not been heeded.

By way of example, the Place Strategy (p.29) notes that the renewal opportunities include the ability to “establish a context-responsive design approach that achieves a balanced distribution of height, density and scale,” and that a way to achieve this is to “ensure that future built form sensitively interfaces with key heritage items.” The proposals for the Prince Alfred Sidings, including the adaptation of the substation into office space, and the building of a new stepped structure of nine storeys, is a good example of this.

The same document (p.26) also notes however that heritage opportunities include “maintaining views and sufficient separation to the Sydney Terminal Building and clocktower.” The proposed building of a podium above the Country and Intercity Platforms (the North OSD component of the project) and the building of new towers above this space (including a 39 storey tower) can in no way be considered a sensitive interface, nor does it maintain views or sufficient separation from the clock tower. As the Heritage Impact Statement notes (p.117) “The setback, whilst minimising direct physical impacts to the Main Terminus Building, does not provide an adequate curtilage to the building to minimise the visual impacts of the proposed tower.”



The “heritage context” diagram in the Place Strategy (p.26) notes the importance of maintaining views to the Clock Tower and, through the “Devonshire Street view corridor”, to the Marcus Clark Building on Broadway (left), yet the proposal as shown in the Urban Design Framework (right) shows how the proposed TOGA Tower above the Parcels Post Building will block the identified view from Devonshire Street, while the significant cluster of buildings north of that line and the decision to build a platform over all of the Country and Intercity Platforms of the Terminal will completely block some of the most important views of the Central Clock Tower – from the platforms themselves.

National Trust Recommendation:

Any renewal must ensure that the significant heritage values of Central Station are maintained and in some cases improved at the heart of the principle transport interchange in Sydney.

The National Trust recommend that the assessment of the proposal’s own Heritage Impact Statement be carefully considered and genuine efforts be made to reduce the significant detrimental heritage impact of this proposal. The Trust would argue at a minimum that the entire North OSD component of this project be removed from the proposal, and that Mortuary Station must retain its important place in the wider railway precinct.



Central Station is a major defining element in the city, but also a significant barrier between parts of its immediate surrounds. (Source: Woods Bagot)



The proposal dwarfs its surrounding context and bears little relationship to the scale of the station itself. (Source: Architectus)



Financial Viability and Alternative Schemes

The investment that will be required to facilitate the outcomes of this rezoning proposal will be in the billions of dollars, and the engineering challenges of building over live railway infrastructure will be enormously complex. This project will also take decades to complete and must aim to minimise impact to the station during construction – not turn it into a permanent building site.

It is in this context that the claim in the Precinct Study (p.80) that *“a number of built form typology options... were proposed”* needs to be considered. Options that involved a “warehouse typology” of low built form north of Central Walk and a “courtyard typology” offering a scaled transition to Belmore Park were rejected in favour of a “single tower typology” as the preferred option. One must seriously question whether these were actually ever legitimate options and the National Trust would urge that further options for Central must be seriously considered.

Transport for NSW (TfNSW) is the Proponent for this rezoning proposal, however what has come to be known as Sydney’s “Central Precinct” is owned by the Transport Asset Holding Entity (TAHE) of NSW, which is a State Owned Corporation established in July 2020 and which has since been the subject of significant criticism from the NSW Auditor-General. The TAHE has been reported as being designed to “help the government achieve a budget surplus” and being “required to deliver a certain rate of return.”⁵

The desire to rezone Central Station needs to be viewed in the context of these financial imperatives, and the need to derive significant returns from this state-owned asset. As the Heritage Impact Statement notes (p.165) *“More sympathetic options have been considered and discounted as part of this process, in a balance of achieving good heritage outcomes and viable development at the Precinct.”* Central Station is too important to loose in order to make such an audacious proposal simply financially viable.

National Trust Recommendation:

The Trust agree with the Heritage Impact Assessment (p.157) that *“The proposed masterplan has undergone a number of design iterations which seek to conserve the heritage fabric of Central Station. However the design does not preference options which have minimal impact on heritage areas, views, and archaeology of exceptional or high heritage significance.”*

Heritage must be a key driver for any proposal for Central Station, and the urban design and planning aspects of this proposal must not be driven solely by the need to generate significant financial return from the Central Station precinct.

Other legitimate options for the site must be seriously reconsidered, in particular the decision to build the North OSD, and the impacts on Mortuary Station.

Concerns regarding the State Heritage Listing of Central Station

The Executive Summary (p.14) of the State Significant Precinct Study prepared by Ethos Urban describes the proposal:

Taken together, Central Precinct presents a transformative, city shaping opportunity. To realise this opportunity, this State Significant Precinct Study (the SSP Study) proposes an ambitious plan to renew Central Precinct. At the heart of this plan is a vision to reshape Central Precinct as:

⁵ Raper, A., and Swanston, T., *NSW government's 'poor' accounting leads to extra \$5b in rail payments, auditor-general's report finds*, ABC News online, Wed 9 Feb 2022 <https://www.abc.net.au/news/2022-02-09/nsw-government-criticised-over-accounting-by-auditor-general/100816682>



'a vibrant and exciting place that unites a world-class transport interchange with innovative and diverse businesses and high-quality public spaces. It will embrace design, sustainability and connectivity, celebrate its unique built form and social and cultural heritage and become a centre for the jobs of the future and economic growth.'

(Transport for NSW, 2021)

This vision for Central Precinct is supported by 31 directions and a structure plan. To give effect to this plan, the SSP Study is proposing to rezone Central Precinct, which involves changing planning controls covering matters such as land use zoning, building height and floor space ratio.

Importantly, the existing State heritage listing for all of Central Precinct will be retained.

National Trust Comment:

Simply retaining the State heritage listing for a place does not ensure it is being treated appropriately. This project will severely threaten the heritage values of Central Station, as the proposal's own Statement of Heritage Impact confirms.

It is the Trust's opinion that the proposal, as currently on exhibition, will have a cumulative and serious detrimental heritage impact on a number of the aspects of significance that warranted the original listing of the Sydney Terminal and Central Railway Stations Group on the NSW State Heritage Register in the first instance.

There has been no shortage of advice and research into the important heritage values of Sydney's Central Station, and it is because of this that the current proposal is so disappointing. The National Trust were very pleased to read a genuine and well-constructed heritage assessment of the proposal in the documentation provided, and agree completely with the findings of the project's Statement of Heritage Impact by Artefact heritage which states (p.117, with National Trust emphasis in bold) that:

*...there would be a substantial amount of change proposed in and around the state significant precinct. The proposed works would have **a cumulatively negative heritage impact** on the significant heritage values of the Sydney Terminal and Central Railway Stations Group, with **major impacts physically** through the loss of original fabric and spaces including the Country and Intercity platforms, as well as **major impacts visually** through the compromised setting and loss of significant views and vistas to and from the area.*

*Furthermore, works to the Western Gateway which have been approved as part of separate applications have already had and would have major direct and indirect impacts to the heritage item. **The proposed masterplan would be a further cumulative impact on these existing approved impacts** and others which have been occurring as a result of concurrent projects at Central Station in relation to station and track upgrades and new Sydney Metro.*

*Overall, the heritage and cumulative impact to the state significant Sydney Terminal and Central Railway Stations Group would be **major** direct and indirect impacts.*

Heritage Impacts Clearly Identified, and Clearly Ignored

The Heritage Impact Statement (HIS) notes a number of significant heritage impacts that will result from this proposal and its many aspects. The National Trust have reviewed this document closely and against the other information presented in the extensive documentation on exhibition. It is very clear that the detrimental heritage impacts of this proposal have been clearly understood, but that little has been altered in the scheme to minimize these impacts. The Trust feel it is important to reinforce a number of the concerns raised in this document, which we support:



- (p.117) The replacement of the entire grand concourse roof (an element of exceptional significance) with glazed material *“would be a major impact to the significant roof structure and fabric of the Grand Concourse, as well as **detrimentally impacting the overall aesthetic design of the building.**”* This element of the proposal is only made necessary due to the overshadowing caused by the north OSD.
- (p.117) The proposed tower on the North OSD *“would directly impact upon the significant fabric and setting of the Main Terminus Building and significant vistas from the surrounding streetscapes and vantage points. The proposed development scale at 39 storeys above the Grand Concourse ground plane would be **unsympathetic to the small-scale of the Main Terminus Building,** with the potential to create large degrees of overshadowing over the significant structure and negative encroachment on the visual curtilage of the building.”* The HIS also notes this tower will impact views from Belmore Park, George Street, Pitt Street, and Elizabeth Street.
- (p.120) The North OSD component of the project will include towers 21-39 storeys in height, and involve significant demolition of the original platforms. *“As part of the proposed developments in the sub-precinct it is anticipated that **the potential built form would require the removal of the existing significant platform structures** some of which have fabric which dates back to the original construction in 1906, with the original fabric of exceptional significance.”*
- (p.121) The proposed glass-bottom water feature above Platform 1 *“**would not mitigate the major physical and visual impact of the (OSD) development on the platforms.**”*
- (p.121) *“The proposed development would see the introduction of new buildings which would have a **negative heritage impact on the significant visual setting** of the Central Station SSP study area, particularly the visual relationship between the Main Terminus Building and Mortuary Station.”*
- (p.120) *“Subject to confirmation of the methodology for investigative works and project constructability, there is potential for **major impacts to significant archaeological remains.**”* Impacted elements may include significant archaeological remains associated with the Devonshire Street Cemetery, the Benevolent Asylum, Carters Barracks, the Christ Church Parsonage, and other significant archaeological remains associated with the third Sydney Station.
- (p.123) The proposed Eastern Colonnade of the OSD, while an interesting design feature in its own right, *“would have a major visual impact to the Central Electric Building and the Above Ground Platforms, with the OSD ground plane sitting at the height of the Above Ground Platform’s canopies. At platform level the visual development wall which the OSD would create would **impact the cross station views and sense of open space** which has historically been afforded the platforms. The building’s ground plane is also above the Central Electric Station roofline, which, along with the already approved Metro canopy would further deteriorate the building’s presence within the whole Central Station complex, **relegating the building to a mere façade as viewed from Eddy Avenue,** rather than from in the round as it has historically been understood.”*
- (p.127) The proposed South OSD *“would not require the removal of significant built heritage”* and *“The overall bulk and mass of the proposed OSD would be minimised by the masterplan design’s implementation of laneways and mid-block connections to integrate a finer grain development on the western edge and additional open space to the OSD.”* The south OSD would however have a negative impact on visual relationship between the Mortuary Station and the Main Terminal. In particular *“whilst the proposed South OSD is substantially setback from Mortuary Station, the southernmost building presents **a sheer wall and large-scale mass and bulk to Mortuary Station** to its south, and does not respect or take into consideration the low-scale nature of the building. The southernmost tower would further minimise its impact on the exceptionally significant Mortuary Station by implementing setbacks to its southern perimeter which would engage its southern surroundings and respect the existing heritage urban context and scale at this location.”*
- (p.129) The proposal includes building towers of between 36 and 41 storeys on the area known as the Regent Street Sidings. *“Whilst the proposed development includes staggered setbacks to its southern extent to provide a low scale podium adjacent Mortuary Station (which is a positive outcome for Mortuary Station), the overall proposed development scale of **the two towers would be unsympathetic to the small-scale Mortuary Station,** with the potential to create large degrees of overshadowing over the significant structure.”*



- (p.159) In terms of the identified CMP requirements for heritage curtilage, the HIS is clear: ***“The proposed masterplan development does not provide sufficient curtilage around the existing significant buildings, structures and landscapes. The proposed masterplan design physically impacts significant fabric, and has a major detrimental impact on the setting and significant views and vistas to the precinct. The scale of the proposed masterplan development has a major and detrimental cumulative visual impact on Central Station and its environs. The proposed masterplan design is not a sympathetic solution and does not satisfy the recommendations of this CMP policy.”***

National Trust Comment:

It is unclear how the current proposal can be put forward for a State Heritage listed location, when so many major aspects of it are clearly in contravention with the heritage advice for the place. The existing State heritage listing for Central Precinct will be severely impacted by this proposal which will build over approximately 45% of the listing curtilage and have major negative impacts on key components of the site.

The State Heritage Listing, the heritage system in NSW generally, and the many and various reports that have identified significant components of this place, need to genuinely inform any proposal of such magnitude. It is the National Trust’s opinion that many of the elements that contribute to the overall significance of the Central Station Precinct, will be severely diminished by the impacts of this proposal and the other separate proposals for the western gateway.

To permit this scale of development at Central Station, within the boundaries of a State Heritage Listed precinct, must surely place at risk other similar items considered by the community to be protected by State Heritage Listing.

Sydney LEP Listing

The CMP notes (Policy 27) that any design must *“Ensure that the urban setting of the Central Station Precinct is treated in an appropriate and sympathetic manner which recognises its exceptional heritage significance and contribution to the character of inner Sydney and Special Area as designated in the Sydney LEP 2012.”*

The National Trust agree with the Heritage Impact Assessment (HIS, p.159) of this Policy that *“The proposed masterplan design does not ensure that the urban setting of the Central Station Precinct is treated in an appropriate and sympathetic manner. The proposed design does not recognise the exceptional heritage significance and contribution of the Precinct to the character of inner Sydney and the Special Area as designated in the Sydney LEP 2012, instead **the masterplan design has a detrimental impact on the urban setting, seeking to develop over the station, increasing the density, mass and scale of the area, which is substantially surrounded by fine-grain.** The proposed masterplan design is not a sympathetic solution and does not satisfy the recommendations of this CMP policy.*

Goulburn Street Carpark

The Trust note that the Precinct Study includes an amendment to the Height of Buildings Map for the SLEP 2012 to include “applying no height limit to Goulburn Street carpark sub-precinct, with the Belmore Park sun access plane setting the maximum allowable building height to this land (refer further below regarding sun access planes)”. The Place Strategy (p.27) also notes the opportunity for “renewal of Goulburn Street car park site above existing rail.”

National Trust Recommendation:

The National Trust would call for any proposals for the Goulburn Street carpark to be specifically excluded from this rezoning proposal. The carpark is not generally considered to be part of the Central Precinct, has its own specific issues, and must be dealt with as a separate proposal.



Inconsistent with “Benchmark Precedents”

The Central Precinct Urban Design Framework (July 2022, p14) outlines a series of “benchmark precedents” from around the world which relate to large scale transformations of significant railway stations.

None of the current proposal for Sydney’s Central Railway could be compared favourably with these truly transformative and inspirational projects. The sheer scale of the Sydney proposal compared to the surrounding areas, the way it blocks rather than celebrates view of the terminus, and the way it diminishes rather than elevates the arrival experience for rail passengers, is a poor and unnecessary outcome for one of the most important historic railway and civic buildings in Australia.



Where London’s King’s Cross Redevelopment has been celebrated for its urban amenity and the way it has been delicately inserted into its surrounding context (left), the Sydney Central Proposal is simply an exercise in maximising built envelopes to create a wall of development with little visual interest, the scale of which is truly unfathomable (right).



Where London’s St Pancras Station platforms are washed in natural light (left), Sydney Central will be transformed into an underground series of platforms with no amenity whatsoever (right).



Where in 2012 all 34,000sqm of glass roofing at Edinburgh Waverley Station was renewed and upgraded (left), in Sydney in 2022 the platforms are proposed to be placed in permanent shade under the North OSD.



Rail Heritage - Devalued and Destroyed

The National Trust recognise the significant efforts of the Heritage Section of Sydney Trains, Transport Heritage NSW, the Australian Railway Historical Society, and many other associated groups for their long and dedicated work across many years in celebrating, activating and promoting the heritage of the railways in NSW. This proposal, to the most significant station at the heart of the railway network in NSW, is in stark contrast to these collective efforts. As the central station of the entire network, and the starting point for all lines in NSW, the detrimental impacts of this proposal to rail heritage in Australia will necessarily spread far beyond just the curtilage of this heritage item.

Recent publications such as the Sydney Trains Moveable Heritage Guidelines; events such as the 2022 Transport Heritage Expo which has just occurred; and works across the network from the revitalisation of Central Station's War Memorial Boards to the recent conservation of Armidale Railway Station, have all been recognised and awarded by the National Trust and other bodies for their excellent work, often with significant volunteer input and involvement.

The current proposal however, by its immense scale and proximity, will significantly reduce the scale, grandeur, authenticity and heritage values of Sydney's Central Station. The most significant rail terminus in Australia will now be a location where all of the terminating platforms are completely covered, and the landmark clock tower reduced to a mere postage stamp.

There are certainly parts of the proposal, including the desire to extend the "Goods Line", which will celebrate the heritage values of the precinct, but in many other aspects it will severely diminish the identified heritage values and miss significant opportunities for heritage engagement, particularly with regard to the main terminal and its role as a significant transport interchange both now and into the future.

The way to achieve good outcomes is clear, and has been identified in the proposal, where the Urban Design Framework (p.67) notes that *"the SSP development is an opportunity to re-establish the civic role of the Sydney Terminal Building. It has the potential to become the centrepiece of the precinct, an important meeting place and iconic entry to the OSD."*

This is absolutely the case, yet instead of making it the centrepiece of the precinct, the new views of the terminal itself from the east-west concourse described as the "Devonshire Link" will be blocked by large towers of up to 39 storeys, and the arrival to the station by train as part of the "iconic entry" with a view of the clock tower will be buried underground with no connection to the actual outside environment at all.

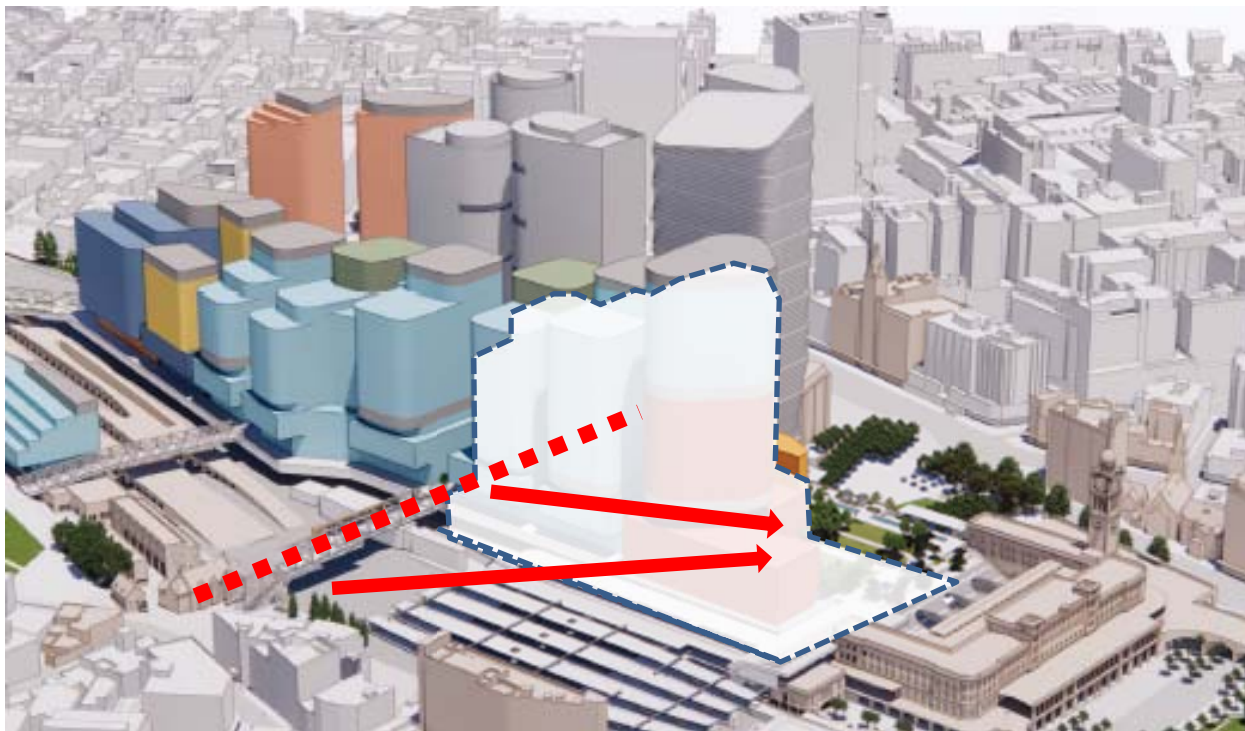
National Trust Comment:

The National Trust agree with the assessment of the Heritage Impact Statement that the proposed open-air cross link above the Devonshire Street Tunnel, known as the "Devonshire Link" would have a generally positive contribution to the precinct by spanning across the Central Yards connecting the OSD and western perimeter to the east, terminating near the Railway Institute Building.

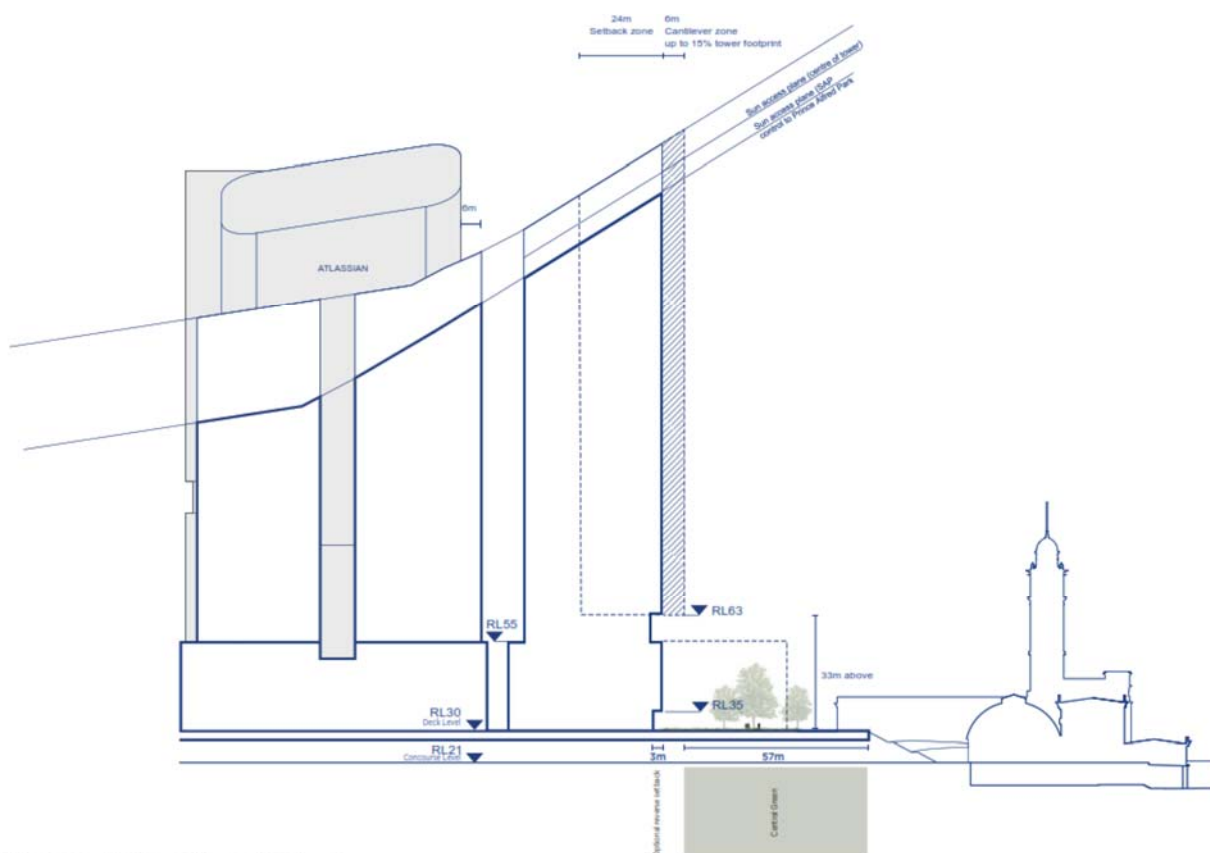
The benefits of this link are however compromised by the North OSD element of the proposal. The Devonshire Link could form an excellent opportunity to access the Country and Intercity platforms from the south whilst reinforcing the civic importance of the Central Terminal Building to those arriving as pedestrians or train passengers.

Any renewal project for Central Station must have at its heart the renewal of the place as a landmark transport interchange which can, just as the original station has done, service the people of NSW and their growing need for efficient public transport and connections to the rest of Australia for the next 100 years.

How depressing will it be when, hopefully in the future, a very fast train system is finally delivered in this country, only to arrive in a dark underground platform, not into the greatest rail terminal in Australia.



The very real opportunity to “re-establish the civic role of the Sydney Terminal Building” and let it “become the centrepiece of the precinct” will be prevented by building a series of towers of 21-39 storeys to the north of the proposed Central Walk as part of the North OSD. (Source: Architectus, with National Trust overlay)



253 North-south section - Central Green and A1 tower development parameters

The scale of the proposed North OSD and its towers is almost beyond belief, and does not respect the Central terminal or its clock tower at all. The towers are so large and so elevated, that even their podium at RL 63m is almost as tall as the clock tower. (Source: HIS, p.124)



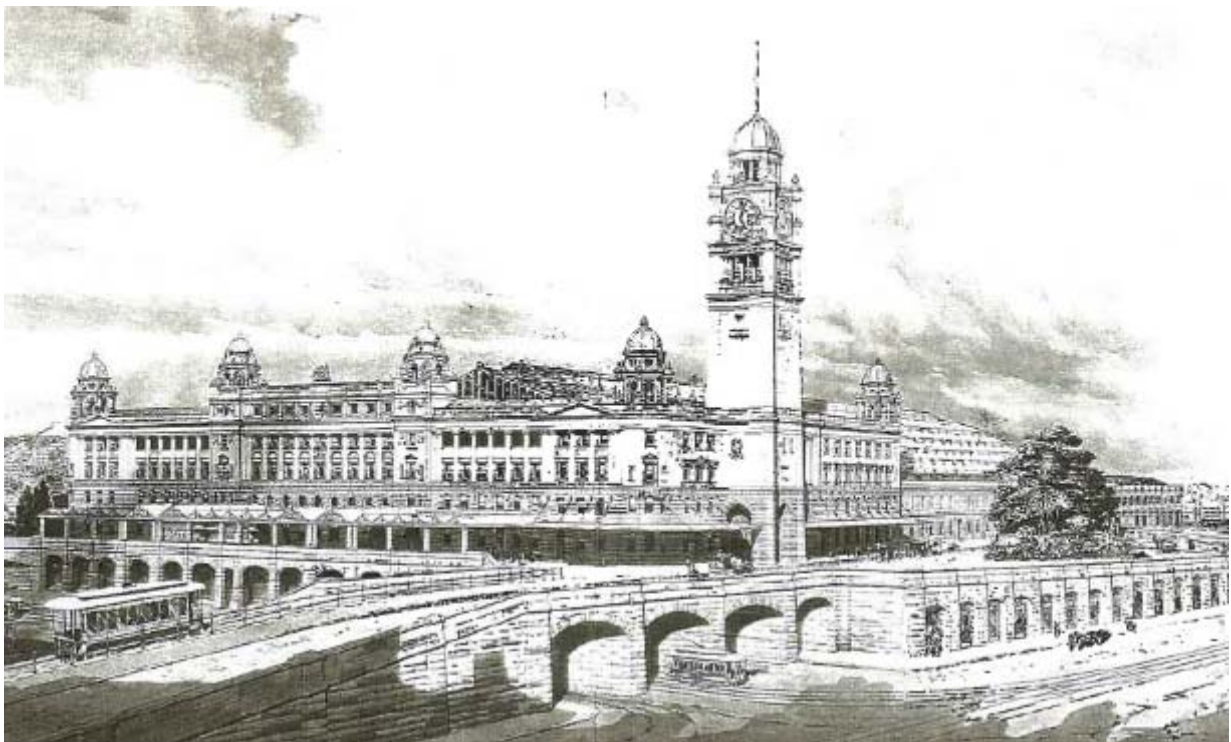
Covering of the platforms

Central Station has long played an important role as a defining feature and arrival point for Sydney, as was originally intended by NSW Government Architects Walter Liberty Vernon and George McRae who were responsible for its design. The former NSW Government Architect Chris Johnson describes Central as Vernon's "principle contribution to Sydney's civic domain" and noted that its design "marked a gateway at the southern end of the city."⁶ Peter Webber, another former NSW Government Architect, also notes the station as a key arrival element in the city, where "the clock tower of the Central Railway Station, symbolizing the arrival point for long distance trains to the city, serves also as a marker for those arriving by road along the principle arteries."⁷

Vernon's original design for the station (seen below) of course included a very large glazed canopy above all of the terminating platforms, but this was never completed. Such a design is of course entirely consistent with the design approach to large railway terminals all over the world – both historically and in contemporary station design and renewal, providing a large, light-filled public space befitting a major transport terminal.

The current proposal for Central Station totally ignores this historic precedent, demotes the arrival sequence to a less than suburban quality, and prevents forever the opportunity for a marvellous contemporary architectural glazed roof being erected at Central Station to facilitate a truly magnificent arrival sequence.

As Yale Professor and architectural historian Vincent Scully Jr. reflected on the 1963 demolition of New York's Pennsylvania Street Station and its replacement with a charmless subterranean shopping mall: "*one entered the city like a god... one scuttles in now like a rat.*" Sydney risks joining this illustrious club should the North OSD eventuate.



Vernon's original design included a significant glazed canopy over all terminal platforms. This design feature could readily be incorporated into any Central Station Revitalisation. The current proposal will instead bury the platforms to create a dark cavern. The clocktower was been described by Professor Philip Goad in *The Encyclopaedia of Australian Architecture* (2012, p.583) as a "masterpiece of civic design."

⁶ Johnson, C., *Shaping Sydney*, 1999, p.89

⁷ Webber, P., *The Design of Sydney*, 1988, p.2



Contemporary station designs such as Melbourne's Southern Cross Station (left) elevate the importance of the platforms in a unique way, while London's St Pancras Station (right) has retained and celebrated its original roof and reinterpreted its platforms.



Proving that the best in contemporary design can respond to the unique heritage qualities of railway terminals, London's Kings Cross Station (left) elevates the arrival experience, and Stuttgart's "Stuttgart 21" project (right) involves over 4700sqm of glazed skylights in a large plaza with no high-rise buildings.

Steam Locomotives – no longer part of Central's Rail heritage

We note that Transport for NSW has denied in the media the claim made by the National Trust that steam locomotives will no longer be able to arrive Central Station.⁸ Our assertion was made on the assumption that the North OSD component of the project in particular will trap the fumes from these locomotives at the platforms where they currently arrive.

A simple word search of the Design Guide, Planning Report, and Explanation of Intended Effect documents for the proposal shows no mention of steam locomotives in these key documents.

The Urban Design Framework (p.95) however notes that there will of course be a smoke exhaust system in case of fire, but it also states that ***"The station operating policy will prevent Steam and Diesel locomotives (eg excursion trains and Indian Pacific) from operating under the deck due to the smoke and fumes that would be generated."*** It is unclear if this is a general policy, or a policy in the event of fire – we have interpreted it to be the former.

This conclusion is also supported by the "Evidence of Consultation" in Appendix B (p.43) of the Pollution Study by Arcadis. This document contains minutes from a meeting from April 2022 which states that ***"Constructing a deck over the rail corridor may constrain exhaust from diesel locomotives, also expecting electrification over time. Disembarking location may change."***

⁸ <https://www.theguardian.com/australia-news/2022/oct/01/nsw-redevelopment-plan-poses-very-real-threat-to-sydneys-central-station-national-trust-says>



In the minutes of that meeting it goes on to note that this important issue had not been resolved:

PS – Confirm if coal steam trains have been considered.

*PR – Has been discussed, **likely that those trains would have to depart somewhere else.** No firm plans currently made.*

The actual Pollution Report (July 2022) does not address this issue or indicate that it has been resolved. It is thus the conclusion of the National Trust that steam locomotives will no longer be able to use Central Station as a result of the North OSD and its complete covering of all Country and Intercity platforms.



On the morning of 12 March 2021, the Governor of NSW, as Patron of Transport Heritage NSW, officially relaunched the 3801 Locomotive at Platform 2, Central Station, Sydney. The steam locomotive, itself listed as a heritage item, had returned to service following an extensive restoration. Steam locomotives would not be able to use Central Station under this rezoning proposal, and the view of 3801 in the context of the city as shown above would of course be impossible with all platforms made underground. (Source: Transport Heritage NSW)

National Trust Recommendation:

Central must not become an underground terminal.

Any major proposal for Central Station must not involve construction over its country platforms (the North OSD), particularly to the north of the line established by Devonshire Street. Major platforms need a connection to light, air and the outside world.

Instead of the current proposal, consideration should be given to the opportunity to complete the station design and respect its function as a major arrival point to the city. This may be through the construction of a large contemporary glazed roof that integrates with its historic setting.

Steam locomotives, particularly the Transport NSW Heritage Fleet, are a vital part of the history and heritage of railways in Australia, and they must be able to arrive and depart Central from Central Station.



Prominence of the Clock Tower

The views of the clock tower at Central Station are a key feature of the place and were noted in extensive publicity in March 2021 for the 100th anniversary of its construction. As the then Minister for Roads and Transport, Andrew Constance, noted at the time:

“At 85 metres high, the clock tower was designed to dominate the surroundings as a beacon, and it remains one of our most recognisable landmarks,” Mr Constance said. “Sydney Trains has done a wonderful job preserving and celebrating this important part of our state’s history... over the last 100 years.”⁹

Although the tower has a significant relationship to the surrounding environment, which has been extensively documented, it is also important to the station itself. As the Non-Aboriginal Heritage Study notes (p.76, with National Trust emphasis in bold):

*“Internal views from the Country and Interstate platforms to the Clocktower and Main Terminus Building are key significant historic views which have been visible since the opening of the Terminus and platforms in 1906. **Maintenance of these historic and significant view lines is necessary to retain the visual connection between the elements at Central.**”*

The merits of this assessment were noted by Sydney Trains Acting Chief Executive Suzanne Holden as part of the 2021 celebrations: *“In the days before smartphones and digital watches, the clock tower was the sole source of the accurate time for commuters and railway workers, who set their pocket watches to the time displayed on the clock tower face.”¹⁰*

Due to the building of the North OSD as outlined in this proposal the important views of Central’s Clock Tower, particularly from the platforms, will be lost forever.



Locomotive 3801 at Sydney’s Central Station in 1954 (left) and in 2021 (right). Views of the clocktower from the platforms, along with steam locomotives, will be lost under this proposal. (Source: NSW State Archives, Transport Heritage NSW)

⁹ <https://www.transport.nsw.gov.au/news-and-events/media-releases/central-station-clock-tower-strikes-100>

¹⁰ *ibid*



Visual Impact Assessment

The National Trust feel compelled once again for a major proposal in Sydney to comment on the Visual Impact Assessment (VIA) that has been prepared to accompany the proposal. We seriously question the value of such an assessment as the one that has been provided. The report is said to be based on relevant criteria and analysis to satisfy planning requirements. If this is the case then such criteria must be reviewed as a matter of urgency, for only one view has been analysed as being of “high” impact.

Unlike the majority of other extensive documentation and reports that have been placed on exhibition as part of this proposal, the authorship of this report is not identified. The report simply notes (p.10) that *“This VIA has been prepared by appropriately qualified and experienced experts, including surveyors, photographers, software specialists, architects, urban designers and urban planners.”*

Given such expert authorship, the report should be less confusing. It notes, for example (p.20) that in terms of the way people will view and respond to a place, *“while people typically have a high level of interest or attention in views from parkland settings, there are few such public places in the visual catchment. The notable exceptions are Prince Alfred Park and Belmore Park.”* How can a report state there are few parkland settings where people will have a high level of interest or attention in the visual catchment of Central Station, only to call Belmore Park and Prince Alfred Park “exceptions” in the next sentence?

Equally confusing, the report (p.73) concludes that *“The proposal will not block any significant views from public places identified in the SDCP2012”* before going on to note that the proposal will block visibility of the identified views of the clock tower from Prince Alfred Park and also that *“the approved Western Gateway sub-precinct will block views from the Cleveland Street and Regent Street viewpoints, which is also identified in the SDCP2012 as a significant view from a public place.”*

Even more bizarrely, the report notes that each of the views 1 (whether impacted or not), for the entire Central Station rezoning proposal is “capable of being reversed.” Are we now to believe that a 200m tall tower blocking a view of a historic building is now simply “reversible” and this makes it have less impact? We would certainly dispute the claim that this rezoning proposal that will result in billions of dollars worth of construction at Central Station is in any way “reversible” in the generally accepted use of the term – if this argument is accepted then the whole built fabric of the city must be considered reversible.

The National Trust also cannot agree with the conclusion of the Visual Impact Assessment (p.78) that:

“the proposal does not result in significant, unacceptable visual impact that cannot be justified on environmental planning grounds or adequately mitigated through the new planning framework and development assessment process, including the design excellence process and any conditions of development consent.”

The National Trust would argue that the impacts of this proposal cannot be dealt with by design excellence processes or conditions of consent.

As the Heritage Impact Statement (p.159) for the proposal states, we would argue instead that this massive proposal has *“a major detrimental impact on the setting and significant views and vistas to the precinct,”* and that the scale of the proposed masterplan development has a major and detrimental cumulative visual impact on Central Station and its environs.



This iconic view of Central Station (identified as being of “medium” cultural value), will be completely obscured by this proposal, yet its visual impact has only been described as “moderate” and “capable of being reversed”.
(Source: Visual Impact Assessment, p.30)



The view to the west from Prince Alfred Park, encompassing the entire city skyline beyond, will be completely altered under this proposal, however the significance of the visual impact is ranked as “moderate”. Again, the entire Central Rezoning proposal is noted as “capable of being reversed.”
(Source: Visual Impact Assessment, pp.34-35)



The important view of Mortuary Station from Regent Street is to have its roofline obscured by the southernmost tower of the South OSD, and the overall visual impact has been, in the National Trust’s opinion, correctly identified as “high”, however it is still noted as being “capable of being reversed.”
(Source: Visual Impact Assessment, p.63)

National Trust Recommendation:

This proposal cannot in any way be described as “reversible.”

An accurate and objective Visual Impact Assessment, formed on the basis that this rezoning proposal will result in a permanent alteration of not just Central Station but the entire southern end of the Sydney CBD, must be prepared by an identified consultant.



Mortuary Station

The Trust also agree with the Heritage Impact Statement (pp.129 -130) regarding its concerns for Mortuary Station. The documentation states (p.130) that the proposed function of the building “is to be confirmed in detailed design stages” yet this is simply leaving the vital use of this highly significant building and its major contribution to the site unanswered.

The context in which Mortuary Station now sits, in particular since the creation of the new Central Park precinct in Chippendale, has changed dramatically in recent years. Now is the opportunity for this building to be given a use and to engage with this new part of the city.

The current proposal however is to:

- adapt the building into a public park by removing its railway platform,
- build large towers to the north which overshadow it, and
- extend the southernmost building of the South OSD to present a sheer wall in front of it, disconnecting it from the wider railway precinct.

This is not an acceptable heritage outcome for what many consider to be James Barnet’s finest building.



The renewal of Central finally presents an opportunity for Mortuary Station to once again play a role in the city, however the proposal, particularly through the extension of the southernmost tower of the South OSD, reduces its visual prominence from Regent Street and cuts it off from its surroundings. New pedestrian pathways appear to bypass it and it appears in isolation, with a use still not defined. (Source: Tyrell Studios)

National Trust Recommendation:

Mortuary Station must retain a meaningful connection to the wider Central railway precinct. It could form an ideal entry to the precinct from the south, and respond to the Darling Harbour Line extension.

Mortuary Station must have a defined use, and this use must influence the overall planning proposal, not come after it. It must be seen as a part of the Central Railway Precinct, not a small little sandstone building in isolation.



Conclusion

Central Station is one of the most important heritage landmarks in Australia. It is an entire precinct that is composed of multiple, interrelated parts that together form a unique urban landscape. Its historic importance and ongoing civic value is without question, however many aspects of this proposal will have a serious and cumulative detrimental impact on the cultural landscape of this place.

Although the station precinct warrants renewal and the way of achieving this is complex, the way forward, at least from a heritage perspective, is clear. The components of the proposal which encourage the sensitive adaptive re-use of structures such as the Railway Institute Building, Electric Sub-station and Mortuary Station are to be commended, as are the efforts to forge new connections within and across the precinct including the activation and extension of the Goods Line to Darling Harbour.

What this masterplan proposal and the separate proposals for the Western Gateway risk however is destroying many of those elements which the project's own vision statement seeks to achieve. The building of the North OSD and attendant construction of very tall towers immediately adjacent to the landmark clock tower can in no way be described as "celebrating its heritage values." The complete covering of all Country and Intercity Platforms to limit access to light and air and prevent use by steam locomotives cannot be described as "a world-class transport interchange." Elevated plazas with no connection to ground level or surrounding streets cannot be described as "high quality public spaces," while the deficiencies of Belmore Park go unresolved.

The efforts and proposals to "resolve" Central Station are as old as the station itself. Despite its current inadequacies, these efforts over 150 years have left the City of Sydney with a remarkable public building and a unique series of public spaces. The public benefit of much of the current proposal has however appeared to come as a secondary consideration to the maximisation of saleable floorplate.

The negative heritage impacts of this proposal are clear and must be heeded.

The State Heritage Listing of an entire precinct must stand for something.

Despite (or perhaps because of) the scale of this proposal, it risks destroying more than it will create. When it was built, Central Station was comparable by world standards. Any renewal must have the same benchmark, and we simply must do so much better than this for Sydney.

The National Trust urge proper and serious consideration of the lasting impacts of this proposal, and call for significant reduction in its scope as the only way of alleviating many of the identified concerns.

David Burdon
Conservation Director