

2 September 2024

NSW Department of Planning, Housing and Infrastructure

Submitted online

**Re: TOGA Central Modification 2 (SSD-33258337-Mod-2)**

The National Trust makes the following submission on the modification application for the TOGA Central Development located at 2 and 8A Lee Street, Haymarket – affecting what has historically been known as the Parcels Post Building at Sydney’s Central Station.

The National Trust of Australia (NSW) previously lodged its formal objection to this proposal, based on the severe heritage impact that the proposal would have on a most important building listed on the NSW State Heritage Register. The Trust of course notes that Development consent (SSD 33258337) was granted by the Department of Planning, Housing and Infrastructure (DPHI) on 2 February 2024, yet we remain totally dismayed that such an important building could be demolished to such an extent as has been proposed.

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). We dispute the insinuation in the Design Report (Bates Smart, June 2024, p.3) that the Parcels Post building is “not however listed independently on the State Heritage Register” and is therefore somehow secondary in consideration with Central Station – it is an important part of this precinct.

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 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 opposed the building of a tower over and above this important building. We disagreed with the earlier Heritage Impact Statement (prepared by Urbis, November 2020) which stated (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 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 revised Heritage Impact Statement (Urbis, 2 July 2024) is equally concerning in its assessment in response to the guidelines relevant to heritage matters outlined in the *Design Guide: Western Gateway Sub-precinct* (prepared by Transport for New South Wales in September 2021). **The National Trust cannot in any way support the conclusion in the Heritage Impact Statement (p.12) that “almost all interventions would generate a positive heritage outcome.”**

The initial guidelines were very clear with regard to development on Block C. They stated that any development should:

- minimise adverse impacts to significant heritage fabric;
- be designed to ensure treatment of tower cores and lobbies adjacent to the heritage item are to have regard to the original form and facades, allow for interpretation and minimise intervention to all facades.

Just as the Eastern Canopy in the proposal has been modified to allow for greater visibility of the northeast corner of the Parcels Post Building, the National Trust can see no reason that the proposed tower lift core could not be modified to allow for the retention of the original exterior – particularly the southeast corner.

The argument in the previous 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.

As we noted in our previous submission, 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.”<sup>1</sup> 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:

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<sup>1</sup> Central Precinct Draft Strategic Vision (October 2019), p.15

- “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”<sup>2</sup>

The National Trust is of the opinion that this approved 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.

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.”<sup>3</sup>

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.

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<sup>2</sup> Central Precinct Draft Strategic Vision (October 2019), p.28

<sup>3</sup> Draft Design Guide Version 1 | Western Gateway Sub-precinct, p.17