

24 July 2013



The Director General  
NSW Department of Planning  
GPO Box 39  
Sydney NSW 2001

Dear Sir

**MP 08\_0015 Mod 1 and SSD 5708  
North Eveleigh Affordable Housing Project.  
Response to Submissions – Heritage Commentary**

At the request of our client, City West Housing Pty Ltd, Graham Brooks and Associates Pty Ltd has prepared this response to the heritage related comments in the following submissions made during the exhibition of Major Project MP 08\_0015 Mod 1 and State Significant Development (SSD) 5708, North Eveleigh Affordable Housing Project:

- City of Sydney, dated 3 June 2013
- NSW Heritage Council Delegate, the Heritage Branch, Office of Environment and Heritage, dated 7 June 2013

**Comments from the City of Sydney Council**

Although the City of Sydney Council submission does not have any specific comments in relation to heritage it does include the following comments that relate to those made by the Delegate of the NSW Heritage Council:

*It is noted that the proposed Development Application is not strictly compliant with the building footprints and envelope approved for this building (Building D4) in the North Eveleigh Concept Plan, and proposes a part additional 7th storey and variations to the approved building footprint.*

*Generally, no objection is raised to the modified height as it is considered to be contextually appropriate and maintains transitional building heights that scale up from Wilson Street southwards towards the railway tracks. It is considered that, subject to an appropriate design and materiality, that the additional height can be accommodated on this site without resulting in any additional adverse environmental or amenity impacts beyond that assessed as acceptable in the original Concept Plan.*

71 York Street, Level 1  
Sydney 2000 Australia  
Tel: 61 2 9299 8600  
Fax: 61 2 9299 8711  
gbamain@gbaheritage.com  
www.gbaheritage.com

Graham Brooks and  
Associates Pty Ltd  
Incorporated in NSW  
ACN 073 802 730  
ABN 56 073 802 730  
Nominated Architect Graham Leslie Brooks  
NSW Architects Registration 3836

**Response to Comments from the NSW Heritage Council Delegate**

Comment	Response
<p><b>Proposed modification to concept plan for North Eveleigh (MP08-0015MOD1)</b></p> <p>1. On the whole, revitalisation of the subject site is a positive step provided the overall industrial character of the subject site is retained in the detailed site layout, public domain works and design of individual buildings.</p>	<p>Concept Plan approval for redevelopment of North Eveleigh for residential, commercial and retail and cultural uses was granted as Major Project No. 08_0015.</p> <p>No modifications are proposed to the approved general site layout, or public domain elements, as part of this application.</p> <p>The subject site is currently a vacant parcel of land within the State Heritage Register curtilage of the Eveleigh Railway Workshop and in the vicinity of the former Carriage Workshop and Blacksmith's Shop which epitomise the industrial character of the area.</p> <p>The detailed design of Building D4 has considered the massing of the adjacent industrial buildings and reflects the materiality and rhythmic form of the buildings in its vicinity without mimicking the composition and materials of the heritage items.</p>
<p>2. The Concept Plan envisaged the new development would have a continuity of scale with that of the historic buildings. With this in mind it would be appropriate to retain the height of the proposed building to be similar to the height of the Carriage Works especially on its junction with the affordable housing buildings. It is therefore, considered that the proposed modification is likely to have a detrimental impact on the continuity of scale expected by the Concept Plan and should be avoided, if possible.</p>	<p>The Carriage Workshop and the proposed affordable housing on the site of Building D4 are physically and visually separated by the width of the alignment of Traverser No. 2, (in excess of 20 metres).</p> <p>The approved Concept Plan allows for Building D4 to be slightly higher than the Carriage Workshop, as a transition between the lower scale buildings at the Wilson Street frontage and the taller development adjacent to the rail corridor.</p> <p>The variation proposed to the height of Building D4, to achieve closer conformity with the allowable floor space, retains the conceptual building hierarchy and is consistent with the continuity of scale envisaged in the approved Concept Plan.</p>
<p><b>Proposed state significant development application for affordable housing (SSD 5708)</b></p> <p>1. The proposed building is located in the vicinity of a significant Heritage Building (Carriage Works Building). The concept plan is expected to have a continuity of scale with heritage buildings. The proposed design and increase in height of the building is contrary to this expectation. It is desirable that the height of the proposed building D4, especially on the eastern corner, is reduced to be no more than the height of the Carriage Works building.</p>	<p>As noted above, the approved Concept Plan allows building D4 to be higher than the Carriage Workshop. The variation proposed in the design for the affordable housing building will not impact on views to and from this building, and its intrinsic bulk and scale will ensure it remains the dominant built element in the former rail precinct.</p> <p>Given their different periods, functions and architectural design, it is preferable if the new building does not closely match the height of the Carriage Works.</p>
<p>2. The proposed architectural treatment with deep wrap around recessed balconies is likely to be at odds with the industrial character of the Carriage Works Building and other heritage buildings on site. Deeply recessed balconies from a solid external wall create a built form that has a potential to compete with the heritage buildings in the vicinity</p>	<p>As the proposed development is a new residential building in a former industrial setting, not the adaptive reuse of an existing building, it is considered appropriate that it have a residential character.</p> <p>The strong external wall treatment that results from the recessed balconies is evocative of the former character of the area and is considered to be sympathetic to the heritage buildings in its vicinity.</p>

<p>3. Use of exposed brick finish for the eastern section of the proposed building is desirable. However, the proposed brick colour is not clear. It is recommended that the selected brick colour is sympathetic to the colour of the bricks used in the Carriage Works building</p>	<p>The Carriage Workshop building facade comprises a variety of bricks, including a darker coloured brick similar to the ones proposed for the affordable housing building.</p> <p>A brick sample board has been prepared for submission with the revised plans. The new bricks selected reflect the variations in colour and size found in the adjacent buildings and are considered to be sympathetic to the Carriage Workshop building.</p>
<p>4. A proposed entrance at the eastern edge would be considered more sympathetic with the Carriage Works building if it was designed as a solid wall with an opening for entrance rather than the whole building being recessed with only the columns presenting on the northern façade at ground level. Consideration should be given to this aspect of building D4.</p>	<p>Noted. Amended plans have been prepared and submitted in response this comment.</p>
<p>5. It is considered that increase in the foot print is acceptable and is unlikely to have any detrimental impact on heritage buildings provided the eastern edge of the previously approved building envelope is retained.</p>	<p>Noted and agreed.</p>

### Conclusions

The *Building D4 North Eveleigh Statement of Heritage*, prepared by Graham Brooks and Associates in April 2013, included the following conclusions:

- The heritage impacts of the adaptive reuse of the North Eveleigh site were considered in the approval of the Concept Plan. Impacts were identified and measures for their mitigation were included in the conditions for consent of the approval. No additional mitigation measures are recommended for this application.
- There will be no further heritage impacts resulting from the proposed design for Building D4. The aesthetic, technical and social significance of the adjacent former railway buildings, the Carriage Workshop, Blacksmiths' Shop and Clothing Store, will not be compromised by the proposed development.

Graham Brooks and Associates considers that the minor amendments made to the design, in response to the submissions received, have adequately addressed the heritage considerations. As such the application is recommended for approval.

Yours faithfully  
Graham Brooks and Associates Pty Ltd



Gail Lynch  
Associate Director  
gaillynch@gbaheritage.com