



19 December 2019

Mr Graham Jahn
Director, City Planning, Development & Transport
City of Sydney
Town Hall House
456 Kent Street
Sydney NSW 2000

Dear Graham ,

RE: MODIFICATION OF CENTRAL PARK CONCEPT PLAN (MP06_0171 MOD 16) AND BLOCK 4B CENTRAL PARK ADAPTIVE REUSE (SSD 9374) – RESPONSE TO SUBMISSIONS

Agency and public submissions were received during the exhibition period for the proposed modification to the Central Park Concept Plan and the State Significant Development (SSD) for the adaptive reuse of the Brewery Yard buildings known as Block 4B within the Central Park redevelopment precinct. The following is provided in response to:

- The submission received from the City of Sydney (File No: 2019/572869 – reference R/2014/33/I & R/2018/13/A) dated 15 November 2019.
- The Department of Planning, Industry and Environment
- Heritage NSW

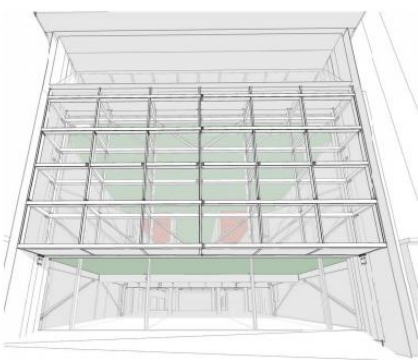
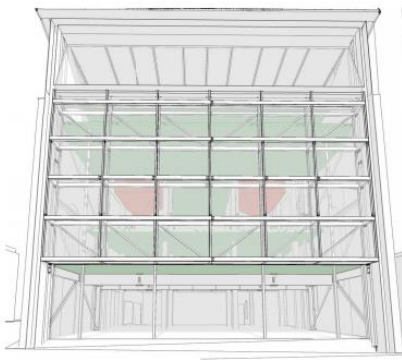
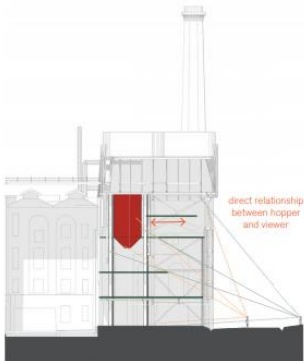
This correspondence addresses the heritage matters raised therein and should be read in conjunction with revised drawings prepared by Tzannes Associates in their Response to Submissions. Responses are provided in Table 1 below. Urbis has also provided heritage advice to the consultant team in preparing the response to submissions.

Table 1 – Response to heritage matters

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<u>City of Sydney Council</u>	
1.1) Rooftop Addition The proposed roof addition provides for an additional 2 floors. The addition is distinct from the original masonry form of the building, it comprises glazing and	1.1) The proposed rooftop addition has been designed in such a way to mitigate visual impacts. through its considered built form. The addition is partly obscured behind the parapet and the form of the upper floor addition is modulated with a splayed roof form to protect principal views from the south to the principal southern and eastern elevations. Setbacks to the east and west

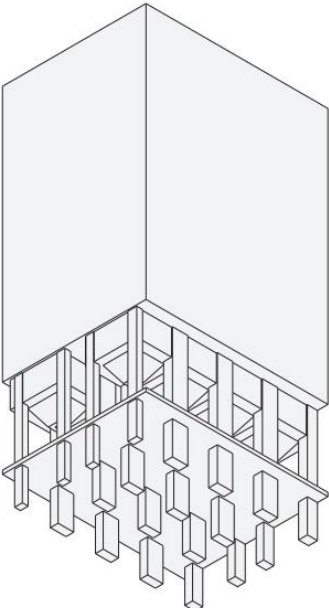
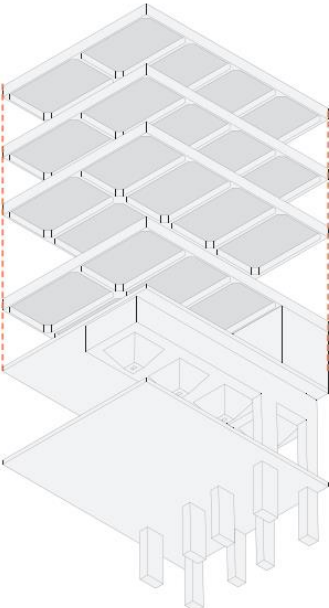

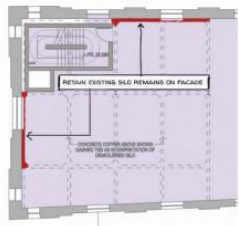
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<p>metal materiality to distinguish. Its construction requires the removal of the existing gabled truss roof and one of the two towers. The additional floors will be apparent in views from the north towards the northern elevation of Building 22/23. Its form is supported but the impact on heritage fabric is high. The form does not draw an objection from the City but notes the impact on the heritage significance of the site is high.</p>	<p>of the addition similarly protect these views and ensure that the addition is obscured by the parapeted facades. Critically, the City’s response acknowledges that the form of the addition is supported and does not draw an objection.</p> <p>Materiality has been designed to distinguish between the old and new and to have regard to the architectural language and character of the triggen plant/ cooling towers. The materiality also complements the industrial character of the original Brewery buildings and therefore is considered appropriate. This approach has been taken with all of the proposed additions.</p> <p>The proposal provides for an additional 2 floors allowing additional required floor space to make this adaptive re-use project financially and practically feasible. As detailed in the Heritage Impact Statement, removal of the existing gabled truss roof is unavoidable to facilitate this outcome, however this is mitigated by the retention and conservation of the gabled truss roof at Building 26. Overall the proposed addition is considered reasonable with consideration for the facilitation of future occupiable space, and the design efforts taken to mitigate visual impacts and to comply with the intent of the Stage 1 design. The new level will also include heritage interpretation zones where retained elements will be placed on display.</p>
<p>1.2) New external stair tower</p> <p>The submitted heritage impact statement does not take into consideration this stair new tower. The statement should be revised taking into account the updated proposal.</p> <p>Penetrations to the existing building seem to coincide with the existing windows. The bulk and visual impact could be reduced, however, if the proposed structure will host the staircase only and</p>	<p>1.2) The proposed external stair is located on the northern (rear) façade and takes advantage of the existing built form elements within the existing Brewery Yard public square by building over the existing plant. The proposed stair core responds to the architectural language, materiality and industrial character of the tri gen plant as well as the proposed roof additions. In terms of its relationship to the brewery building, it is considered sympathetic in that it:</p> <ul style="list-style-type: none"> • is offset from the building, with the linking component being narrower to maintains views to the façade • locates openings within the blind window openings – minimising physical impacts to the façade and allowing

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<p>reduces the length of the “corridor space” between the staircase and the building. The City notes the visual impact is high but acceptable.</p>	<p>the original to be interpreted. Removed brickwork is able to be salvaged for reuse elsewhere on the building</p> <ul style="list-style-type: none"> • considers significant components of the façade – for instance, the external component of the stair moves in and out of the building, servicing levels 1-4. This allows the northern parapet to be retained with no intervention for access to the roof top addition. • enables the northern façade to remain dominant through considered scale (lesser than the parapet height) and materiality (the proposed metal mesh reads as semi-transparent while the heavy masonry façade prominent).
<p>1.3) Removal of one coal hopper in building 30</p> <p>This hopper is documented to be of exceptional heritage significance and one of the few surviving elements of the brewery. Its position is important allowing its appreciation from street views, through the proposed glazed façade. Its demolition is not supported and careful considerations should be made to avoid building visual interruption between the hopper and street views. The City notes the impact on the heritage significance of the site is high and detrimental.</p>	<p>1.3) The central hopper is required to be demolished to enable practical occupation of this space and allow for the adaptive re-use of this building through the provision of additional floor space in building 30. The Heritage Impact Statement acknowledges that the removal of the hopper has a heritage impact but further noted that the remaining two hoppers will be retained in situ and will facilitate the meaningful interpretation of this significant element. Urbis understands that the additional floor space is required to make the adaptive re-use financially and practically feasible and the proposal seeks to balance the heritage aspects with the new commercial use of the building.</p> <p>The proposal incorporates a bridge spanning between building 26 and the new extended floor level within building 30 and running between the two remaining hoppers. The proposed bridge will allow for users of the space to have a close interaction with the remaining hoppers, which does have a heritage benefit and offers a unique interpretation experience.</p> <p>It is acknowledged that the introduction of the floor space reduces the opportunity for external views of the hoppers within the space. In response to the Council feedback Urbis has liaised with project architects to consider design revisions to mitigate and reduce the impact of the mezzanine insertions on views. The intent of the revision is to maintain the interpretive</p>

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	<p>potential of close contact with the retained hoppers in different floor levels, with better visual connection from the public domain through the redistribution of floors and voids in this space.</p> <p>Reference should be made to the submitted Response to Submissions prepared by Tzannes. The revised scheme shows improved views from the public domain to the coal hoppers resulting from the redistribution of floor slabs in building 30. The significant view to the bottom of the hoppers is also maximised following the redistribution of floor slabs design, including cutting back level 2. This scheme allows for better interaction between each floor level and the hoppers (see views of the revised scheme below).</p> <p>Fire engineering strategies were considered to remove the glass around the hoppers, however none of the strategies met the minimum fire separation regulations for a space over 3 levels.</p>
 <p data-bbox="268 1624 459 1657">New proposed scheme. View from footpath (4m from facade)</p>	 <p data-bbox="699 1624 890 1657">New proposed scheme. View from footpath (15m from facade)</p>  <p data-bbox="1342 1400 1422 1444">direct relationship between hopper and viewer</p> <p data-bbox="240 1704 1353 1771">View of the hoppers is improved by the redistributed floor slabs. This assists to mitigate visual impacts</p>

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<p>1.4) Reorganisation of floor levels internally for additional mezzanine floors.</p> <p>The proposed additional floors and mezzanine to building 30 does not have a setback from the glazed large façade. These additional 3 floors stop the visibility of the heritage hoppers from street levels. The large glass façade is an important part of the project that allows the appreciation of the exceptional heritage hoppers from street views.</p> <p>Further, this area within building 30 is the only remaining space within the whole Central Park redevelopment site that could be retained as an open large space for spatial appreciation of the industrial scale of the historic use. This space, enriched by the 3 hoppers, could become the most significant aspect of the project. No additional floors or any opaque surface that interrupt or diminish this visibility of the hoppers are supported. The City notes the impact of these works on significant heritage fabric is high and is detrimental to the significance of the site.</p>	<p>1.4) The response addresses only the additions within building 30 noting that the response raises no specific objection to the reorganisation of floor levels within building 22/3.</p> <p>See also comments in section 1.3 above with regard to proposed redistribution of floor levels and the reduction of the extent of the slab to level 2 to mitigate visual impacts and improve views to the hoppers. Redistribution of the floor slabs also allows levels 1-2 to be read as a large double height volume and the top floor mezzanine is also setback from the façade and assists to interpret the larger volume of the original space. This is also assisted by the legibility of the previous rooflines visible in the interior fabric.</p> <p>Reference should be made to the Tzannes response to submission with regard to the glazed façade. Key design principles have driven this design development. The design of the north facade has been developed to better integrate the hoppers with the broader space of the northern rooms. The tripartite design of the facade has been maintained along with the monumental ground floor opening.</p>
<p>1.5) Removal of silos in building 23</p> <p>Building 23 is the only building to have an original internal structure</p>	<p>1.5) Design development as well as structural and construction investigations have revealed that it is extremely challenging to</p>

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<p>and was the only building to retain its original function as part of the malt silos/ plant. It is of exceptional significance. Previous proposals to the building included the demolition of 6 of the 8 concrete silos, with the 2 easternmost silos being retained, along with the retention of the pyramidal funnel forms at the base of all 8 silos on the ground floor and the plant equipment on the two easternmost silos. This was supported by City is that the complete structure was retained and the function of the structures were interpreted.</p> <p>The current proposal seeks to further reduce the extent of the silos, retaining the two concrete silos on the first floor only and removing the silos on the upper floors. The impact on the heritage significance is high and detrimental and is not supported. It is recommended that the original extent of the retention of the silos is maintained.</p>	<p>partially retain the silos as proposed in the previously approved SSDA.</p> <p>A number of options were reviewed prior to submitting the SSDA and again following the feedback from the City. This included review of the previously approved scheme, which was not achievable from a structural perspective, buildability and earthquake standards. Urbis understands that this is extremely difficult having regard for buildability and compliance. The silos rely on each other in part for structural support and demolition has implications for any silos proposed to be retained. The interpretative capacity of the fully retained silo's is also challenging as it is not possible to engage with them beyond the external appreciation of a concrete wall without structural and compliance implications.</p> <p>As such it has been proposed to retain where possible and reconstruct where this is viable. Interpretation as proposed within the SSDA is retained but is complemented by further retention of the fabric of the silos where the concrete engages with the existing brickwork of the external walls (and without clashing with windows). The new concrete coffer ceilings will provide a strong interpretation in the scale and positioning of the silos level by level.</p> <p>Reference should be made to the submitted Response to Submissions prepared by Tzannes (see also reference drawing below).</p>

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 <p data-bbox="316 1214 566 1249">Existing concrete silos and associated structure [Isometric view from below]</p> <p data-bbox="256 1256 507 1288">Proposed SSDA 3d diagrams showing proposed interpretation</p>	 <p data-bbox="758 1214 1061 1249">Proposed concrete coffer ceilings as interpretation of silos [Isometric view from below]</p>  <p data-bbox="1181 795 1244 806">Ground Floor</p>  <p data-bbox="1129 1214 1332 1249">Proposed reinterpretation of silos and extent of retention in plan view</p>
<p data-bbox="225 1332 877 1366">View of the proposed and amended silo interpretation</p>	
<p data-bbox="225 1388 590 1467">1.6) Modifications to external windows and doors</p> <p data-bbox="225 1489 662 1713">The City requests that the replacement of steel framing should be conditioned to be “like for like” in the same material. The proposed aluminium framing is not supported and should be avoided.</p>	<p data-bbox="662 1388 1444 1579">1.6) It is understood that the majority of the windows are in poor condition and are not able to be repaired. In addition, the hazardous material consultant and subcontractor identified ACM contamination in the mastic of all of the windows which must be removed.</p> <p data-bbox="662 1601 1444 1792">Having regard for the extent of necessary replacement and projected costings for like for like replacement in bronze or steel, it was proposed to incorporate new aluminium windows that had regard for the original window typologies and their hierarchy.</p> <p data-bbox="662 1814 1444 1960">As set out in the Tzannes response to submissions, it is intended that new windows will be contemporary bespoke aluminium window frames with high performance glazing. The new glazing is defined by a shadow detail separating the</p>

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	<p>window from the surrounding brickwork and an expressed fine aluminium edge, referring to the existing steel window system.</p> <p>The new windows will be apparent as new and part of the contemporary overlay of the commercial building. If the windows are to be new and in a new materiality, it was determined that a new approach was preferred to attempting to replicate the breakup and details of the original windows.</p>
<p><u>Department of Planning, Industry, and Environment</u></p>	
<p>Please provide further justification for the extent of modifications to the Brewery Yard building and removal of significant building fabric, having regard to the issues raised by Council and Heritage NSW. You should also consider mitigation measures to minimise the impact on the heritage significance of the building and site.</p>	<p>The proposal seeks to balance the demands of the proposed commercial functions as well as the architectural logic and heritage constraints and opportunities of the building.</p> <p>The submitted Heritage Impact Statement acknowledged that the proposed works had the potential to impact on significant heritage fabric through intervention to components such as the silos and the coal hopper, as well as proposed façade works, notably the proposed replacement of window fenestration. Impacts have been mitigated where possible. With regard to the silos, the proposed reconstruction comes about as a result of structural feasibility as we understand that the silos are not able to be retained in part. Interventions to the silos for interpretation or adaptive functions also has structural implications for compliance and hence is not considered by the project engineers to be feasible. With regard to the removal of the central hopper, whilst there is an impact in the loss of the fabric, the scheme has a heritage benefit in that it allows for closer interaction with the silos.</p> <p>Refer also to detailed responses above and below with regard to matters raised by City of Sydney Council and Heritage NSW.</p>
<p><u>Heritage NSW</u></p>	
<p>The proposal involves a high degree of intervention to the building fabric which may have adverse impact on the heritage</p>	<p>Consultation was undertaken with City of Sydney on 5 December 2019. A response to heritage impacts has been provided by Urbis as detailed above.</p>

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<p>values of the site. The extensive reorganisation of the internal structure to provide for additional levels and mezzanines, as well as the proposed additions including a new roof top have the potential to irreversibly alter significant fabric. While the 2019 HIS states that the internal structure is generally modified or later fabric, the building remains an intact remnant of the site's significant brewing history. Further intervention to the site, including the removal of the silos and coal hoppers which inform the early layout and historical use of the site, may continue to erode the heritage values of the precinct. It is recommended that the City of Sydney be consulted in relation to these issues</p>	

We trust that the above assists in the further assessment of the proposal and the amended proposals. If you have any questions please don't hesitate to contact me on 02 82337610.

Yours sincerely,



Fiona Binns
Associate Director