

Regulatory, Planning and Assessment.SMasia/GMansfield
Reference: SDC2022/0006
Phone:02 4974 2767

8 July 2022

Chris Eldred
Regional Assessments
Department of Planning and Environment
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Reply by NSW Planning Portal: <https://www.planningportal.nsw.gov.au>

Dear Mr Eldred

**CARRINGTON HYDRAULIC ENGINE HOUSE (DA22/6312) 106 BOURKE STREET
CARRINGTON**

I refer to the Department of Planning and Environment's (DPE) email of 31 May 2022 advising a Statement of Environmental Effects (SEE) has been received for a development application (DA22/6312) for alterations and additions to the Carrington Engine House associated with the Stage 3 restoration works. As the SEE is being publicly exhibited the DPE has invited City of Newcastle's (CN) to provide advice on the proposal.

The SEE and plans have been reviewed and the following advice is provided for your consideration:

1. Heritage

The application proposes remediation works to address a significant asbestos hazard present in the subfloor area of the heritage listed building. The SEE states that friable asbestos fibres are stuck to/embedded within the original cast iron floor grates of the engine room and embedded asbestos material is present in the ground surface of the subfloor cavity. The stability of the floor structure of the engine room is also compromised, with significant corrosion having occurred at the base of the steel columns supporting the floor.

It is noted in the application that Heritage NSW requested a detailed options analysis of potential remediation methodologies:

'From previous consultation and from the information you have presented to us, the structural integrity and sub floor asbestos contamination are clearly hazards that need to be addressed to assisting in attracting and securing an end user for the adaptive re-use of the engine house. We agree that remediation works proposed for the sub floor are required and advise that a S60 application for these works is submitted. An options analysis of potential stabilisation and remediation works should also be submitted with your application. This analysis should

demonstrate what options have been considered and discounted and why the actions/works proposed are most appropriate. Where specialist advice (industrial hygienist, structural engineer, etc) has been sought it should be submitted as part of your application.'

The Options Analysis report (prepared by EJE) presents 10 options to address the asbestos and stability issues present within the building. These are ranked with regard to heritage impacts, budgetary constraints, engineering considerations, end user viability etc. The proposed methodology is to encapsulate the asbestos hazard under a floating concrete slab, with interpretive colouring in the slab to mark out the former location of machinery, and glass inserts to provide select views to the subfloor below.

From a heritage perspective, Option 5 (encapsulation within a glass floor) would provide additional heritage benefits to visitors by reducing physical impacts to heritage fabric and illuminating the area below the glass floor surface attractively. However, it is noted that this limits end user practicality which is essential for the long-term management of the building.

Introduction of the floating concrete slab will have a physical and visual impact in relation to heritage fabric associated with the original engine room, including the cast iron floor grates, concrete engine buttress, and other componentry, and the visual/spatial qualities of the room afforded to visitors. Additionally, removal of masonry elements, steel and timber beams in the engine room will impact the integrity of the heritage item. However, it is considered that the approach presented in the Options Analysis Report and assessed in the HIS is reasonable and will ensure longevity of the building, facilitate development of a new adaptive use, and assist with conservation of the building long term which is an overall positive outcome. The proposed interpretive measures will assist in mitigating this impact by communicating the significance of those removed features.

It is recommended that a condition is included on any consent issued ensuring that a heritage architect is engaged to oversee the proposed works and provide ongoing advice, including an induction session to all contractors prior to commencement of works to highlight the heritage significance of the site. A photographic archival record should be undertaken prior to works commencing and periodically during the construction to document the works. Any building fabric to be removed that is capable of reuse within the building should be retained and reused on the guidance of the project heritage consultant.

It is also recommended that detailed design of the proposed accessible ramp is undertaken in such a way that the ramp is an independent structure, fully reversible and minimises any physical intervention to the exterior of the heritage building.

2. Flood Management

According to CN's records the subject land is identified as being flood prone land. This risk has not been addressed in the SEE. It is recommended the Applicant is required to consider the flood risk to the proposal. In this regard, while it is acknowledged that the provisions of the Newcastle Development Control Plan 2012 do not apply to land inside the Port of Newcastle Lease Area under the abovementioned State policy, it has been previously referred to by the Department in its consideration of some development applications on land within the lease area. Accordingly, it is recommended the Applicant is also required to have regard to any relevant requirements of Section 4.01-Flood Management of the DCP.

3. Section 7.12 Development Contribution Plan

CN's Section 7.12 Development Contribution Plan (Commenced Jan 2022) applies to the subject land. A maximum levy of 1% applies to developments having a cost of the development of more than \$200,000. According to the SEE (Pg 5), the '*estimated costs of the works is \$1,500,000.*' It is recommended that the Applicant be required to provide a cost summary report in support of the application. In this regard, it is noted that sub-clause 208(4) of the *Environmental Planning and Assessment Regulation 2021* provides that. '*...the costs of any development that is the adaptive reuse of a heritage item.*' are excluded from any estimate or determination of the proposed cost of carrying out development.

If you have any questions in relation to the matters raised in this letter, please contact Geof Mansfield Principal Development Officer (Planning) on 4974 2767 or by email on gmansfield@ncc.nsw.gov.au .

Yours faithfully



Steve Masia
DEVELOPMENT ASSESSMENT SECTION MANAGER