

Heritage and Environmental Issues

Heritage

Heritage Local Environmental Plan

- 3.1 The RBA advised the Committee that its Head Office building was not on the Australian Heritage Commission's Register of the National Estate. However, the building formed a part of the Martin Place 'heritage precinct' that was included on the Register.¹
- 3.2 Locally, the RBA Head Office building was listed on the Central Sydney Heritage Local Environmental Plan (CSHLEP). The RBA advised that the CSHLEP described the building as being 'of historical importance for its ability to exemplify a post war cultural shift within the banking industry'.²
- 3.3 The RBA understood that the areas of high significance described in the CSHLEP included:
- the north, east and west façade of the tower;
 - the podium space (the grey and black granite terrace on the Martin Place side);
 - the ground floor foyer;
 - the Banking chamber;
 - the lift lobby; and

1 Evidence, p. 56.

2 Evidence, p. 56.

- the external and entry foyer art.³
- 3.4 According to the RBA, it planned to retain existing finishes and features. It would do this by:
- conserving exterior finishes and features;
 - preserving the existing form, surfaces and façade material; and
 - ensuring that new matching window openings would maintain the existing form and style of the façade.
- 3.5 The RBA noted that major refurbishment work would be primarily limited to office interiors, amenity areas and workshops. These were not listed as being of significance.⁴
- 3.6 The RBA stated that it had notified the Australian Heritage Commission (AHC) in regard to the proposed heritage works. At the time of the preparation of its submission to the Committee, the AHC had not indicated any objections.⁵
- 3.7 In its submission to the Committee, the AHC confirmed that the Head Office of the RBA was included in the Martin Place Conservation Area. The area was entered in the Register of the National Estate. The AHC noted that while not individually mentioned, the RBA building was a 'refined example of the modernist style'.⁶ The AHC also confirmed that the significance of the building relies on the features mentioned by the RBA in its Submission.⁷ (These are outlined in paragraph 3.3 above).
- 3.8 The AHC advised that landmark buildings constructed of quality materials have a significantly longer life than buildings constructed using less durable fabric. The AHC also made the following observation:
- landmark and heritage buildings contribute to the character and significance of urban areas, streetscapes and conservation areas;
 - are usually located in prime locations;
 - provide a sense of tradition and corporate identity to organisations and institutions that can take advantage of these qualities for marketing purposes; and
 - for developing a culture of pride in the organisation.⁸

3 Evidence, p. 56.

4 Evidence, p. 56.

5 Evidence, p. 59.

6 Evidence, p. 99.

7 Evidence, p. 99.

8 Evidence, pp. 99-100.

- 3.9 The AHC emphasised that compliance with the CSHLEP would protect the heritage values of the building. The AHC concluded that for these reasons it supported the RBA's proposal to 'retain ownership and consolidate its accommodation in Martin Place'⁹ The AHC advised the Committee that the proposed Head Office consolidation was 'unlikely to have any adverse affect on national estate values'.¹⁰
- 3.10 A submission from the City of Sydney confirmed the RBA building's listing. It noted that the building appeared on Schedule 1 as item 221 of the CSHLEP 2000. The submission claimed that the City of Sydney considered the building to be of State significance for aesthetic, social and scientific reasons and of national significance for its historic value.¹¹
- 3.11 The submission also noted that as a result of the listing:
- the City of Sydney would normally require a Development Application to be submitted in accordance with Clause 7 of the CSHLEP for 'structural or non-structural alterations to the exterior or interior of a heritage item';
 - the RBA building was marked with an asterisk (*) meaning that any Development Application should be referred to the New South Wales Heritage Council for comment; and
 - a Conservation Management Plan and Heritage Impact statement should accompany the Development Application.¹²
- 3.12 The City of Sydney submission noted, however, that as the RBA building was Commonwealth owned, it was not subject to development consent from local authorities. The Submission forecast that proposed State legislation might alter this procedure.¹³ These points were confirmed at the Public Hearing by Ms Anne Warr, Area Manager, Heritage, City of Sydney.¹⁴
- 3.13 Ms Warr advised that the RBA building was listed on Schedule 1 of the CSHLEP. This came into effect in April 2000. Prior to this date, the building was not previously listed. Ms Warr said that the RBA building was the 'only Commonwealth designed, Commonwealth owned building, high-rise, post World War II building' on the CSHLEP.¹⁵

9 Evidence, p. 100.

10 Evidence, p. 100.

11 Evidence, p. 80.

12 Evidence, p. 80.

13 Evidence, p. 81.

14 Evidence, p. 27.

15 Evidence, p. 24.

Heritage Database

- 3.14 Ms Warr referred to the City Council's heritage database explaining that it held information about the significance of the RBA building and that information had been made available to the RBA and to their consultants.¹⁶ Ms Warr noted that there was no link between the CSHLEP and the database.¹⁷
- 3.15 The Committee drew to Ms Warr's attention the RBA's version of the heritage database. It was noted that the RBA's version, agreed to between the RBA and the City of Sydney in December 1999, differed from that attached to the City of Sydney submission.
- 3.16 Ms Warr agreed that a discrepancy existed. She said that the City of Sydney had received information from the RBA about the listing and the listing was modified accordingly. The points made by the RBA were of a minor nature. The City of Sydney agreed to some and accordingly, amendments were made to the database and a copy sent to the RBA. There had been no correspondence between them after that action had been taken.¹⁸
- 3.17 The Committee sought clarification from Ms Warr about the status and significance of the Heritage Database.
- 3.18 Ms Warr explained that the database was not used to ascertain heritage significance. It was provided by the City of Sydney Council as a courtesy to building owners.¹⁹ The database was established in 1994 by the Sydney City Council to explain to building owners why their building had attracted a heritage listing. The database was accessible to members of the public at the City Council's Library located at Town Hall House.²⁰
- 3.19 Ms Warr further advised that many of the listed buildings have nothing on the database. She said that it was the responsibility of a building owner to do a Conservation Management Plan to determine themselves the heritage values of their building. Ms Warr added that it was not the city council's job to do that job for them.²¹
- 3.20 In reply to questions from the Committee regarding legal obligation on building owners in relation to the database. Ms Warr indicated that the database had no legal basis and no legal implications for organisations whose buildings are listed on it. The Register of the National Estate had no
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16 Evidence, p. 24.

17 Evidence, p. 33.

18 Evidence, p. 25.

19 Evidence, pp. 28, 30.

20 Evidence, p. 30.

21 Evidence, p. 28.

legal binding for other than Commonwealth owned properties.²² However, the CSHLEP had no legal binding for Commonwealth-owned properties.²³

- 3.21 Ms Warr advised that the RBA was not legally bound to produce a Heritage Impact Statement or a Conservation plan. She also added that there was no legal obligation on the RBA to produce a Development Application to the City of Sydney Council.²⁴
- 3.22 Ms Warr was asked to comment about the extent of discussions the Sydney City Council undertook with the AHC in relation to heritage listed buildings. Ms Warr replied that there was no legislative basis for such discussions to take place. The only discussions that take place are on a colleague-to-colleague basis.²⁵

Conservation Management Plan

- 3.23 A submission from the National Trust of Australia (New South Wales) pointed out that alterations made to heritage buildings, especially if they are heritage listed, should be guided by a Conservation Plan. The National Trust had some concern that the preparation of a Conservation Plan was not mentioned by the RBA in its main submission to the Committee. Of further concern to the National Trust was the need for contract documentation and administration to be undertaken by an appropriately qualified conservation architect.²⁶
- 3.24 In relation to the building works being considered for the RBA building the Conservation Management Plan and the guidance of a conservation architect for the period would determine:
- whether any of the interior spaces proposed for alteration were of heritage significance (for example, the auditorium); and
 - guide changes to the fenestration [windows] and cladding on the north, south and west façade.²⁷
- 3.25 The RBA did not accept the criticisms made by the National Trust and made the following points in reply:

22 Evidence, pp. 31, 103.

23 Evidence, p. 103.

24 Evidence, p. 32.

25 Evidence, p. 31.

26 Evidence, pp. 76-77.

27 Evidence, p. 76.

- the National Trust's Submission was made without receiving a copy of the Heritage Impact Statement prepared for the project by the RBA's architects, Woodhead International;
- Woodhead International is registered with the New South Wales Public Works and Services Department. In particular, Woodhead personnel engaged on the project had extensive heritage experience and had undertaken many significant heritage conservation projects in Sydney;
- it was agreed with Sydney City Council in late July 2000 that a Conservation Management Plan would not be necessary and that a Statement of Heritage Impact would suffice, given the time frames associated with obtaining Parliamentary Public Works Committee approval;
- the Heritage Impact Statement, together with Sydney City Council's Heritage Datasheet and RBA's additional research formed the basis for the project's direction in relation to heritage issues;
- the RBA's architects did not believe that a Conservation Management Plan would provide any additional major information regarding the affect of the proposal on the heritage significance of the building;
- Woodhead International would be responsible for documentation and supervision; and
- Woodhead International's conservation architect would be an active member of the contract documentation and project supervision team.²⁸

- 3.26 At the public hearing, Professor Peter Johnson, Board Director and Treasurer of the National Trust of Australia (New South Wales), emphasised the need for a Conservation Management Plan for the project. He rejected the adequacy for the project of the Heritage Impact Statement noting that it was a relatively 'lightweight document'.²⁹ Professor Johnson was highly critical of the RBA for not emphasising in its main Submission the heritage importance of the building.³⁰
- 3.27 The Committee asked Professor Johnson to indicate his level of satisfaction with Woodhead International as appropriate conservation architects for RBA building.
- 3.28 Professor Johnson replied that he had not had sufficient time to examine the curriculum vitae of the architects. He assumed that the RBA would take adequate measures to ensure that the architects possessed the

28 Evidence, pp. 78-79.

29 Evidence, p. 17.

30 Evidence, pp. 17-18.

credentials and skills to undertake work on a building of that period.³¹ His concern related to the question of conservation and knowledge of the period.³²

- 3.29 Despite his criticism, Professor Johnson acknowledged that there had been changes made to the building since its construction in 1964. These he noted had occurred in 1980 and 1992 and that as a result, the building differed 'very much' from its original design.³³
- 3.30 Professor Johnson was asked to comment on the public's impression of the heritage value of the RBA building. He observed that what the general public may say now would be quite different from what they would say in 20 years' time.³⁴
- 3.31 The Committee drew Professor Johnson's attention to the comments made by the AHC in their submission to the Committee and asked Professor Johnson whether discussions had taken place between the AHC and the National Trust.
- 3.32 Professor Johnson replied that on some occasions both organisations considered projects of this nature. However, discussions had not taken place on the project under discussion. He believed that, in part, that was due to shortage of time because of the Olympic period.
- 3.33 Professor Johnson stated that the National Trust and the AHC did not necessarily share the same view on particular projects. He stressed that the National Trust believed it was important that they maintained an independent view that was not necessarily the view of a government organisation.³⁵
- 3.34 The Committee asked professor Johnson's to examine 'before' and 'after' photographs of the building on display in the hearing room and asked whether he had any problems with the current and proposed façade.³⁶
- 3.35 Professor Johnson replied that he was interested in the detail of the windows and of the finishes generally. He suggested that when one is concerned with heritage values one is concerned not just with the overall appearance, as seen in a photograph, but with the particular detail.³⁷

31 Evidence, p. 18.

32 Evidence, p. 19.

33 Evidence, p. 17.

34 Evidence, p. 21.

35 Evidence, p. 23.

36 See Appendices, 13, 14, pp. C-14, C-15.

37 Evidence, p. 21.

Professor Johnson emphasised that a Conservation Management Plan would point out what changes would or would not be appropriate.³⁸

- 3.36 Ms Warr agreed and said she understood that the RBA would commission a Conservation Management Plan. She was concerned, however, that the Conservation Management Plan had not formed part of forward planning for the project. Had it been, decisions may have been made to retain the squash court and leave the cafeteria in its current location.
- 3.37 Ms Warr was concerned that the heritage significance of the interiors were not fully understood.³⁹ She added that she was not satisfied that the Heritage Impact Statement produced by the RBA sufficiently indicated the heritage values of some of the buildings features.⁴⁰
- 3.38 The Committee asked Ms Warr to confirm the RBA's understanding that all parties had agreed that the production of a Heritage Impact Statement was sufficient.
- 3.39 Ms Warr replied that it was her understanding that a Heritage Impact Statement would be prepared for the Public Works Committee's Public Hearing. It was a shorted version of a Conservation Management Plan.
- 3.40 She stated that all parties had acknowledged that a Conservation Management Plan was necessary.⁴¹ Ms Warr added that she had some reservations as to the extent the RBA would modify its project as a result of the Conservation Management Plan.⁴²
- 3.41 The Committee asked the RBA to comment on the issues raised by Professor Johnson and Ms Warr in relation to a Conservation Management Plan.
- 3.42 Mr Austin confirmed that the Sydney City Council had recommended the preparation of a Conservation Management Plan and the National Trust believed it was a good idea. On that basis, the RBA had agreed to its preparation. Mr Austin noted that preparing a Conservation Management Plan as part of the project would cost between \$15,000 to \$20,000.⁴³
- 3.43 Mr Austin further noted that, that a Conservation Management Plan was unlikely to have a significant impact on the project. For example, it was unlikely that a recommendation would ensure the retention of the squash courts. Mr Austin advised that in 1998 a heritage expert, Robert Staas of

38 Evidence, p. 21.

39 Evidence, p. 25.

40 Evidence, p. 28.

41 Evidence, p. 26.

42 Evidence, p. 27.

43 Evidence, p. 37.

the firm Noel Bell Ridley Smith, prepared a heritage assessment. It was in that context that the Sydney City Council had originally listed the building on its Schedule 1.⁴⁴

Squash Courts

- 3.44 The Committee asked Professor Johnson and Ms Warr to comment on the heritage significance of the squash courts.
- 3.45 Professor Johnson observed that the had some historical significance in terms of the general way the RBA had conducted its business and its relationship with its staff.⁴⁵
- 3.46 Ms Warr commented that it was probable the squash courts were the only high-rise squash courts in Sydney. She also noted that the reason they did not appear on the CSHLEP was perhaps due to the City of Sydney consultants not visiting them.⁴⁶ However, Ms War did not suggest that they should remain.⁴⁷
- 3.47 Mr Austin replied that in broad terms, the RBA was very conscious of its history and of the heritage significance of the building. However, a quick estimate of the annual rental indicated that for the space currently occupied by the squash courts, the RBA would be able to receive \$420,000 per annum – slightly more than \$1,000 a day.⁴⁸
- 3.48 Mr Austin said that the RBA could not responsibly keep the squash courts for heritage purposes when they were substantially under used. He believed that a balance must be struck. He stressed that the RBA was obliged to manage its asset to ensure that recognition was paid to the broader interest of the community.⁴⁹

Lift Motor Room

- 3.49 A further point drawn to the Committee's attention by the National Trust related to the new lift motor room. In its submission, the National Trust observed that the new lift motor room might be greater in height than that shown on the drawings attached to the RBA's Submission. The National

44 Evidence, p. 37.

45 Evidence, p. 20.

46 Evidence, p. 34.

47 Evidence, pp. 29, 33.

48 Evidence, p. 37.

49 Evidence, pp. 36-37.

Trust suggested that the height of the lift motor room should be kept down as far as possible.⁵⁰

- 3.50 In its reply to the National Trust's concern, the RBA advised that their consulting lift engineers, Norman Disney Young Pty Ltd, could undertake some modifications. The motor rooms for the new lifts could be located on Level 18 rather than above the lifts themselves. As a result, the lifts would require an over run of 1.2 metres height above the existing roof line.⁵¹
- 3.51 Professor Johnson was asked whether the adjustments proposed by the RBA's consulting lift engineers met the concerns of the National Trust. He indicated that the change 'could be appropriate'.⁵²

Photographic Record

- 3.52 The Committee asked the RBA whether documented records, such as photographs and written material were kept. In particular, the Committee was interested in facilities such as the squash courts and the shooting gallery.
- 3.53 Mr Austin replied that the RBA had an extensive photographic collection of most facilities. He thought that the proposed Conservation Management Plan might help to fill in any gaps. Mr Austin said that the RBA was committed to maintaining a comprehensive record of the amenities and facilities that were part of the original building.⁵³

Environmental

Asbestos Removal

- 3.54 In their main submission, the RBA noted that the proposed works would require the removal of 'a small amount of residual asbestos'. This would be done in accordance with a recently undertaken Asbestos and Hazardous Materials Audit.⁵⁴
- 3.55 At the Public Hearing, Mr Mayes explained that a substantial amount of asbestos had been removed when the building was refurbished in the early 1990s. However, isolated pockets remained. These were difficult to

50 Evidence, p. 76.

51 Evidence, pp. 11, 79.

52 Evidence, p. 22.

53 Evidence, p. 38.

54 Evidence, p. 57.

access and were therefore sealed. The current project was likely to expose areas that might contain asbestos, for example, on Level 19, where some new windows would be created. Mr Mayes stressed that the removal of asbestos would be monitored independently by an asbestos monitoring consultant and contractor.⁵⁵

Energy Management

- 3.56 The RBA noted in its principal submission that engineering services would be reconfigured. Such a proposal would ensure these services became energy efficient and produced less greenhouse gases. The existing Building Automation System would be supplemented with additional energy management software. That would provide increased floor by floor control and minimise energy consumption.⁵⁶
- 3.57 The submission outlined existing energy management systems that would be retained and extended into newly occupied areas. They were:
- photo electric movement detectors for control of meeting room lighting;
 - low brightness high energy efficient fluorescent light fittings;
 - air conditioning systems with outside air and economy cycles; and
 - after hours-on-demand air conditioning systems.⁵⁷
- 3.58 At the Public Hearing, Mr Mayes advised that as part of the 1990s refurbishment of the building a substantial amount of work was undertaken to upgrade the building's systems and services. In particular work was undertaken on the basic engineering design to ensure that it was energy efficient.⁵⁸
- 3.59 One of the major components of that work was the introduction of an automated building management and control system. The facility monitored airconditioning performance and lighting throughout the building. It was intended that the current work proposal would extend the control system to all floors. In addition, the current works would include specifications for high efficiency fittings that already existed in the rest of the building.⁵⁹
- 3.60 Mr Mayes indicated that for a number of years the RBA had completed an energy management plan. One of the components of the plan was the

55 Evidence, p. 10.

56 Evidence, p. 57.

57 Evidence, p. 57.

58 Evidence, p. 11.

59 Evidence, p. 11.

completion of regular energy audits. From that energy audit, the RBA had identified opportunities for savings. Mr Mayes advised that on the floors that would be opened up for tenants, the proposal was to introduce separate meters in order to get a precise picture of energy consumption.⁶⁰

- 3.61 The Committee noted that in the 1990-1994 refurbishment program, it was estimated that the savings from improved energy efficiency would be in the order of \$340,000 per annum. At the public hearing Mr Mayes advised that the savings were \$600,000 per year.⁶¹

Fire Services

- 3.62 The Committee asked the RBA to comment on the provisions made for adequate fire services in the refurbishment and environmental considerations.
- 3.63 Mr Mayes advised that given the substantial amount of work that was done to the fire services as part of the 1990-1994 project, it was proposed to extend the systems to the office areas in the current project. All levels to be converted to leased office space would have the same level of fire protection as the rest of the building.⁶²

60 Evidence, p. 11.

61 Evidence, p. 14.

62 Evidence, p. 10.