

25 October 2019

16009

Emily Dickson
Senior Planning Officer
Department of Planning, Industry and Environment
320 Pitt Street, Sydney NSW 2000

Dear Emily,

SSD 7484 – MODIFICATION 4 RESPONSE TO SUBMISSIONS AND REQUEST FOR FURTHER INFORMATION 23-33 & 35-39 BRIDGE STREET, SYDNEY – THE SANDSTONE PRECINCT

This Response to Submissions and Request for Further Information has been prepared by Ethos Urban on behalf of Pontiac Land Australia (Pontiac) to address submissions received during the notification period of a modification application (Mod 4) to State Significant Development 7484 (SSD 7484) which relates to the development of tourist and visitor accommodation at the Sandstone Precinct, Sydney.

The Section 4.55(2) modification application submitted as Modification 4 was lodged on 28 June 2019 and includes:

- Modifying the internal layout of the Lands Building through removal of 61 guest rooms;
- Introduction of hotel amenities into the Lands Building including:
 - Food and beverage offerings and associated kitchen spaces;
 - Consolidation of bathroom facilities;
 - Business suites;
 - Library and lounge;
 - Event and function rooms; and
 - Activation of the strong room.
- Removal of the previously proposed diagrid at terrace level and extension of existing roof style across new internal walkways, including changes to materials; and
- Creation of publicly accessible terrace spaces and access into the northern dome, including a new mezzanine level.

The application was placed on notification from 18 July 2019 until 7 August 2019.

This letter responds to the submissions made by various agencies and the issues raised by the Department of Planning, Industry and Environment (DPIE) in its letter dated 12 August 2019 requesting a Response to Submissions, and its Request for Further Information dated 16 August 2019 and 3 October 2019. It should be read in conjunction with the following supporting documentation:

- Endorsed Conservation Management Plans for the Lands and Education Buildings (**Attachment A**);
- Design Review Panel Meeting Minutes from 16 April 2019 (**Attachment B**);
- Salvage Methodology prepared by Urbis (**Attachment C**);
- Event Traffic Assessment prepared by Arup (**Attachment D**);
- Operational Waste Management Plan prepared by Foresight Environmental (**Attachment E**);
- Heritage Interpretation Plans prepared by Hassel (**Attachment F**);
- Updated Acoustic Statement prepared by Wood & Grieve Engineers (**Attachment G**); and
- Gross Floor Area Schedule Plan prepared by Hassell (**Attachment H**).

1.0 Request for Further Information and Response to submissions

The DPIE issued Requests for Further Information, which has been responded to in **Table 1** below.

Responses to each of the comments made by agencies during the notification period are provided in **Table 2** below. Agencies which provided comments include:

- Department of Planning, Industry and Environment;
- City of Sydney Council;
- Heritage Council of NSW;
- DPIE Environment, Energy and Science
- Transport for NSW;
- Roads and Maritime Services;
- Sydney Metro;
- Environment Protection Authority; and
- NSW Government Architect.

Each comment has been reviewed by the project team and specialist consultants and the below responses incorporate technical detail as required.

Table 1 Request for Further Information

Department of Planning, Industry and Environment	Response
16 August 2019 Request for Further Information	
Design Review Panel Advice	
Provide the meeting minutes associated with DRP meeting advice 9, dated 16 April 2019, and provide a detailed response to the advice, including where the advice is supported or not supported, and how the modification proposal responds to the advice.	The April DRP meeting minutes are at Attachment B . A response to the DRP advice is provided in Table 3 below.
Northern Terraces	
<p>Provide additional detail in relation to the operation and use of the northern terraces, including:</p> <ul style="list-style-type: none"> • further detail on the proposed use and operation, including hours of operation, noting Condition G1 provides hours of operation for various uses within the hotel • any proposed furniture, landscaping or other structures • any entertainment and music proposed in this area • confirm the potential maximum capacity will be 40 guests on each terrace, with a total of 80 guests, and arrangements to manage guest numbers • confirm any use of the existing terrace on the south side of the building. 	<p>The proposed hours of operation for the northern terraces are 7am to 12 midnight, 7 days a week.</p> <p>A range of furniture will be provided on the terraces, including tables and chairs, benches, deck chairs and other portable features including umbrellas for sun protection as required.</p> <p>Entertainment and music may be utilised in this space, including live musicians and piped music for guest entertainment purposes. Sound levels would be consistent with other similar rooftop facilities in the CBD and would be monitored accordingly. Sound levels would be reduced after 10pm each night, and after 12 midnight activities are to be wholly contained inside the building from midnight. Refer to Attachment G for an updated Acoustic Statement.</p> <p>It is confirmed that patron numbers would be limited to a maximum of 80 across the two terraces, with measures to be outlined within the final Plan of Management (condition F5). No objection is raised to the Department imposing a condition limiting patron numbers.</p> <p>The existing terrace on the south side of the building is not proposed to be used.</p>
Strong Room	
The Design Report indicates that the Strong Room will be returned to its original volume by removing floors and partitions added in the 1950's and be used as a reception, lounge, bar and function arrival space. I note a detailed strategy for demolition and conservation will be developed further, but it's unclear how and when this strategy will be secured and delivered.	The proposed demolition of intrusive infill slabs in order to reinstate the original volume was submitted as part of the Mod 4 drawing package. The schedule of conservation works outlines the strategy for how this will be secured and delivered, as required under condition B44.
Landscaping	

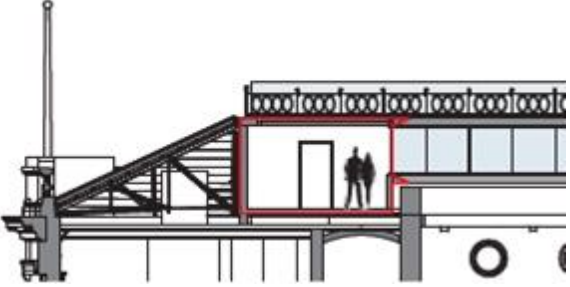
Department of Planning, Industry and Environment	Response
<p>Elaborate on the conceptual landscape approach in the Design Report (pages 84 – 85) by providing an indicative landscape plan for the courtyard and terraces of the Lands Building, including:</p> <ul style="list-style-type: none"> • indicative plant species, noting the comments from EES Group about using native species • changes in paving to identify the historic carriageway • suitable soil depth or pots for planting • further consideration of whether Condition B52 requires any changes. 	<p>The landscape proposal for the courtyards and rooftops include a combination of native and exotic species - a reflection of the local setting and the architectural history. The overall planting palette is inspired by the Gardenesque planting movement which was at its zenith in Sydney at the time of the building’s construction. The style used both local native species in aesthetically pleasing combinations to highlight each species unique form.</p> <p>Proposed species are selected based on their suitability to their unique growing conditions including; solar amenity, wind conditions and soil/ growing media typology. Because the plants are proposed within the building, not all locally endemic species are suitable for the highly modified landscape conditions:</p> <ul style="list-style-type: none"> • Containerised planting - plants selected must suitable for potted conditions. Many local endemic species are not suitable for potted conditions; • Solar access <ul style="list-style-type: none"> - The rooftops receive a high level of solar amenity, some native are species proposed; - The ground floor courtyards receive minimal solar, requiring low-light level planting, some native species are proposed; • Wind - the rooftops are a high wind environment, species suitable to high velocity salt winds are proposed; • Pollinating/ flowering plants - flowering species have been proposed for both spaces, in order to support local pollinating insect birds and insect and to provide seasonal variety and aesthetic interest. <p>The location of the heritage carriageway shall be indicated on the courtyard through variation in paving size, finish and/or format.</p> <p>Planting depths are designed in accordance with City of Sydney planting requirements – 1000mm for the trees, 450mm for shrubs and 200mm for groundcovers.</p> <p>Condition B52 is proposed to be retained.</p>
Building Elements	
<p>Clarify the timing for the proposed updated ceiling condition report identified in the Design Report (page 91)</p>	<p>The updated Ceiling Condition Report will be updated as part of the tender documentation – anticipated to be finalised in November 2019.</p>
<p>Provide further information on the process and timing for selecting the colour for the new roof material, noting the Design Report (page 103) indicates that this will closely reflect the original slate colour of the roof.</p>	<p>Hassell will be working closely with Urbis and Purcell to achieve a sensitive outcome. Hassell will seek endorsement of the colour for the new roof material with Design Review Panel prior to lodgement of the relevant Construction Certificate.</p>

Department of Planning, Industry and Environment	Response
Gross Floor Area	
Clarify the proposed GFA within the Lands Building, as the documentation indicates it is either 10,465 m ² (Modification Report) or 9,790 m ² (GFA schedule in plan set).	The proposed GFA in the Lands Building is 10,465m ² . This is reflected in the GFA schedule in the plan set (Attachment H), noting that the GFA schedule is not an approved plan.
Consistency with conditions of consent	
<p>Confirm whether the proposed modifications impact on:</p> <ul style="list-style-type: none"> Condition B9 requiring further detail being submitted to the Heritage Council, including detail for the strong room (row 2) and roof structures at the Lands Building (row 8). 	<p>The revised design for Lands does impact this condition, more specifically row 8. It is accordingly proposed to amend the wording of row 8 in order to reflect that there is no longer a vertical extension being proposed. e reduced level of impact.</p> <p>There is no change necessary in terms of row 2 (Strong Room) as the level of impacts as the revised design has a similar level of impact to what has already been approved.</p>
<ul style="list-style-type: none"> Condition B14 relating to on site bicycle parking 	Notwithstanding the design changes to Lands and reduction in keys, the provision of 60 bicycle spaces across the precinct is considered to remain appropriate to meet staff and guests needs.
<ul style="list-style-type: none"> Condition B27 which requires a natural ventilation strategy for the Lands and Education Buildings 	It is intended to amend this condition to remove reference to the Lands Building which no longer proposes a diagrid structure (refer to Section 2.1.6). The suitability and application of this condition remaining for the Education Building will be revisited in the future.
<ul style="list-style-type: none"> Condition G1 relating to the hours of operation, and whether this is intended to include the northern terraces 	<p>It is proposed that the terraces are restricted to use between 7am and 12 midnight.</p> <p>A condition being imposed by the Department restricting the hours of operation of the external terraces until midnight.</p>
<ul style="list-style-type: none"> the description of the development, which includes approval for an extension to the Lands Building roof (with a maximum height of RL 38.00), noting that the proposal seeks to remove the diagrid roof on the Lands Building and retain all northern and southern roofs. 	The description of the development has been amended to remove reference to the Lands Building extension. Refer to Section 2 below.
Heritage	
Provide a copy of the endorsed Heritage Council Lands Building Conservation Management Plan, dated May 2017.	Please refer to Attachment A to this response.

Department of Planning, Industry and Environment	Response
3 October 2019 Request for Further Information	
<p>Provide further detail of how the courtyard iron work interpretation is being explored, in response to Council's request that the ironwork (toilet structures and gangways) should be salvaged for interpretation. This could be through a proposed condition or amended interpretation plan.</p>	<p>The majority of the gangways are planned to be removed. Their purpose was to provide access to the toilets, so once the toilets are removed the gangways are effectively redundant. Some of the fabric is in poor structural condition (refer GBA Heritage Conservation Management Plan 2016). The revised design retains a portion of them at each level, using the best original fabric, and allows these elements to be interpreted in their original position. Their removal improves the view through the windows to the stairwells and allows (for the first time) the central Strong Room with its elaborate steel shutters to be clearly seen from the courtyard space. The retained gantry elements are located in the south-west corner of the north courtyard and the north-east corner of the south courtyard.</p> <p>The toilet structure will be reinterpreted in the paving pattern in the courtyard.</p> <p>Refer to Attachment F for further details to strategy for retention and interpretation.</p>
<p>Provide an updated Acoustic assessment to consider the use of the terraces from 6am to 2am.</p> <p>It is noted the acoustic assessment provided as part of the Modification Report considers external noise emission from the terraces between 7am and 12 midnight only.</p>	<p>An updated Acoustic Report has been prepared by WGE and included at Attachment G.</p> <p>WGE advise that use of the terrace between 7am and 12 midnight is acceptable and that after this period activities are required to be wholly contained within the building.</p> <p>Condition G1 is proposed to be amended accordingly to ensure hours of operation of the terraces are limited to 7am to 12 midnight.</p>
<p>Update the GFA schedule plan to reflect the proposed GFA as previously requested.</p>	<p>The GFA Schedule as originally submitted (10,465sqm) remains correct and is attached for information at Attachment H.</p>
<p>Include a copy of the April DRP meeting minutes.</p>	<p>Refer to Attachment B for a copy of April 2019 DRP minutes.</p>

Table 2 Response to Submissions

Agency Comment	Response/Action
Department of Planning, Industry and Environment	
<ul style="list-style-type: none"> respond to issues raised by Transport for NSW regarding passenger pickup and drop off 	See response below.
<ul style="list-style-type: none"> respond to the comments from the Environment, Energy and Science Group of DPIE regarding the landscaping 	See response below.
<ul style="list-style-type: none"> address comments from the City of Sydney Council regarding the amended roof design, courtyard structures and waste. 	See response below.
Heritage Council	
Overall the amended proposal is consistent with the endorsed Conservation Management Plan. It is recognised the proposed modification to the Lands Building proposal will have less heritage impact than the work approved by SSD 7484. We are satisfied that overall the proposed modifications are consistent with the development for which consent was originally granted.	Noted. No action.
City of Sydney	
Heritage	

Agency Comment	Response/Action
<p>Although the external form of the proposed amended roof design to the east and west of the north dome is supported in principle, the structural design requires resolution to ensure that any surviving lath and plaster ceilings supported by existing trusses at the top of the east and west wings are adequately supported. The east-west cross section below (Figure 1) shows the trusses truncated at their mid points. It's not clear whether these trusses are resting on shallow masonry vaults (as in the north wing) or whether they carry the load of both roof and ceilings. In order for the truss to remain more intact, the width of the new east and west corridors could be reduced to that of the original corridors immediately below so that the modified truss could span from the existing corridor wall. Removed truss elements should be recorded in situ, salvaged and stored on site in the roof spaces so that they can be used for future repair and maintenance of retained truss fabric.</p> 	<p>There are no lath and plaster ceilings on the floor below. The roof truss structure is completely independent from the jack arch structure immediately below and only carry the roof load.</p> <p>Reducing the link width to match the existing corridor width below will not achieve clear floor to ceiling height as required under BCA.</p> <p>The link width also accommodates amenities to support the public use of the Tempietti and Northern Dome.</p> <p>Removed truss elements will be recorded in situ, salvaged (two) and stored. According to the Salvage Methodology Report (Attachment C) samples (two) are to be dismantled and stored in the Heritage store or may be used as an interpretative initiative. The Salvage Methodology Report was submitted as part of CC1(a) and has been approved by the Heritage Council.</p>
<p>The courtyard toilet structures and related iron gangways are early fabric and are not without significance. While 'cleaning up' the internal facades acknowledges their proposed public presentation to the court yard circulation network, it should not remove all evidence of historic use. Retention of some ironwork in situ should be considered for interpretation. Substantial elements of the iron gangways, including the brackets should be salvaged for interpretation on site and the toilets should be covered in the revised interpretation plan.</p>	<p>The heritage significance of the toilet structures and iron gangways is acknowledged and it is confirmed that interpretation of these elements including retention of some ironwork in situ and an interpretation of the toilet structure footprint in the paving is being explored. Refer to Attachment F for further details.</p>
Waste	
<p>Council requests that conditions C9 and F17 are amended to reference Council's Guidelines for Waste Management in New Developments 2018 to ensure that demolition, construction and operational waste management is undertaken in accordance with the City's requirements.</p>	<p>It is confirmed that the submitted Operational Waste Management Plan is based on Council's Guidelines for Waste Management in New Developments 2018. It is noted that relevant conditions were amended to reflect 'general' compliance with Council's Waste Guideline. The Operational Waste Management Plan has been updated to ensure it is clear that these Guidelines have been incorporated (Attachment E).</p>

Agency Comment	Response/Action
DPIE Environment, Energy and Science	
<p>The Architectural Design Report indicates the landscape proposal for the courtyard proposes to use a combination of exotic and native species (page 84). EES recommends the landscaping uses a diversity of local provenance native tree, shrub and groundcover species from the native vegetation community (or communities) that once occurred in this locality to improve biodiversity.</p>	<p>The landscape proposal for the courtyards and rooftops include a combination of native and exotic species - a reflection of the local setting and the architectural history. The overall planting palette is inspired by the Gardenesque planting movement which was at its zenith in Sydney at the time of the building's construction. The style used both local native species in aesthetically pleasing combinations to highlight each species unique form.</p> <p>Proposed species are selected based on their suitability to their unique growing conditions including; solar amenity, wind conditions and soil/ growing media typology. Because the plants are proposed within the building, not all locally endemic species are suitable for the highly modified landscape conditions:</p> <ul style="list-style-type: none"> • Containerised planting - plants selected must suitable for potted conditions. Many local endemic species are not suitable for potted conditions; • Solar access <ul style="list-style-type: none"> - The rooftops receive a high level of solar amenity, some native are species proposed; - The ground floor courtyards receive minimal solar, requiring low-light level planting, some native species are proposed; • Wind - the rooftops are a high wind environment, species suitable to high velocity salt winds are proposed; • Pollinating/ flowering plants - flowering species have been proposed for both spaces, in order to support local pollinating insect birds and insect and to provide seasonal variety and aesthetic interest. <p>The location of the heritage carriageway shall be indicated on the courtyard through variation in paving size, finish and/or format.</p> <p>Planting depths are designed in accordance with City of Sydney planting requirements – 1000mm for the trees, 450mm for shrubs and 200mm for groundcovers.</p>
<p>The Architectural Design Report notes the basement and lower ground floor are unchanged by the Mod 4 proposal (page 24). The modification does not appear to propose ground disturbance/any additional excavation outside the area approved by the development consent. If the Mod 4 proposal were to do so, an assessment in accordance with the EES standard SEARs for Aboriginal cultural heritage would be required.</p>	<p>There are no changes to approved extent of excavation.</p>

Agency Comment	Response/Action
Transport for NSW	
Passenger Pick Up and Drop Off	
<p>The Traffic Report prepared to support the modification application states that ballroom previously located in the Education Building is now located in the Lands Building and will increase in size from 210 seats to 350 seats.</p> <p><u>Recommendation</u> It is requested that the applicant provides the following information in relation to the passenger pick up and drop off arrangements for the modified development:</p> <ul style="list-style-type: none"> • Details of pick up and drop off locations noting that the streets adjacent to the Lands Building accommodate bus stops and bus zones; and • Details of the cumulative impact of pick up and drop off arrangements with the hotel component of the development, which is to be located within the Education Building. 	<p>The approved drop-off zone on Bent Street adjacent to Farrer Place will be utilised for the whole precinct. On Bent Street between Gresham Street and Loftus Street there is a taxi queuing area. The original transport assessment proposed a two car bay drop-off zone here to service the Lands Building. Further discussion is required with City of Sydney to determine where taxi zones are being moved to and whether the Bent Street kerb use can be adjusted to suit the Lands Building operation. Refer to Attachment D for further details of anticipated traffic impacts relating to events.</p>
Freight and Servicing	
<p>The Traffic Report states that the loading dock located in the Education Building remains unchanged but does not undertake any assessment of freight and servicing demands associated with the increase in the ballroom capacity.</p> <p><u>Recommendation</u> It is requested that the applicant provide an assessment of the adequacy of the operation of the existing loading dock associated with the potential increase in capacity of the proposed ballroom.</p> <p>If the loading dock cannot provide adequate capacity for any increased operation requirements, the proponent should propose measures in the loading dock management plan.</p>	<p>The increase in ballroom capacity from 210 to 350 seats will not increase the number of truck movements to the loading dock. Speciality deliveries on the day of a function will occur by the same number of trucks holding additional produce.</p> <p>In principle, the Hotel will replenish stocks twice a week for regular operations, however if there is a ballroom function, additional deliveries would be scheduled to occur up to 3 days before in a suitable time slot.</p> <p>Similarly, beverages are delivered at allocated intervals to maintain stock levels on-site.</p>
Construction Pedestrian and Traffic Movement	
<p>It is noted that the Sydney Coordination Office within TfNSW endorsed the Construction Pedestrian and Traffic Management Plan (CPTMP) for the Sandstone Precinct main works in September 2018.</p> <p><u>Recommendation</u> It is requested that the CPTMP be updated to reflect the proposed modification and submit it to the Coordinator General, Transport Coordination for endorsement.</p> <p>TfNSW requests that the applicant consults with the Sydney Coordination Office within TfNSW in relation to the above issues. TfNSW would be pleased to consider any further material forwarded from the applicant.</p>	<p>This recommendation is accepted and will be completed as required.</p>
Sydney Metro	
<p>No concurrence required and no comments.</p>	<p>Noted. No action.</p>

Agency Comment	Response/Action
Government Architect	
Proposed modifications are supported.	Noted. No action.
Roads and Maritime Services	
No objection as unlikely to have significant impact on the classified road network.	Noted. No action.
EPA	
No comments.	Noted. No action

1.1 Design Review Panel Advice 9 Response

Table 3 below outlines the response to the Advice 9 comments provided by the Design Review Panel.

Table 3 **DRP Advice 9 - Response**

DRP Advice	Response
Discussion	
<p>The development of the project with revised uses for the Lands Building has revealed a number of positive outcomes. The previous scheme, which placed hotel rooms within the building, meant that significant impact occurred with the necessary partitioning and intense introduction of services (eg bathroom for each room). The current proposal with dining rooms, bars, wellness facilities and function rooms will allow the existing spaces to be kept more in tact. This allows the grander rooms to be appreciated in their entirety and it means that there are less onerous requirements for fire safety, acoustic treatment and services distribution. It also means that the uses allow the building to be more publicly accessible. The Panel believes that these are all positive outcomes.</p>	<p>Noted. It is agreed that this is a better outcome for the Lands Building and reduces the heritage impacts on the site.</p>
Recommendations	
<p>Strategies The Panel acknowledges and supports the broad strategic moves outlined in the presentation. These include:</p> <ul style="list-style-type: none"> Establishing public access through the building at lower ground level, Retaining and adapting the large volume rooms, Opening up the strong room to appreciate its full (original) volume, Decluttering the courtyards and making them clearer volumes open to the sky, Consolidating vertical circulation to the centre of the building and using the existing stairs. Retaining as much original fabric as possible, and detailing new elements as a contemporary response to the original fabric, subject to further detailed explorations. <p>The Panel also believes that a coherent strategy needs to be developed for the detailing and material palette (finishes, texture, colour, etc) for the new fitout elements to be built into the building. These include fire doors, balustrades, joinery elements, wall finishes, etc.</p>	<ul style="list-style-type: none"> Public access has been ensured through the consolidation of amenity functions of the hotel use through the Lands Building. Changing the intended uses of the building from hotel rooms to larger publicly accessible rooms reduces the needs for partitioning. The Strong Room is being reopened to its original three storey volume. Clearing the courtyards ensures the historic carriageway is returned. Focusing vertical circulation in the centre of the building ensures a strong focus on the heritage stairs within the building. Minimising impacts on heritage fabric is achieved through the retention of the large perimeter rooms. A strategy for the detailing and material palette is being developed noting the intended internal look and feel as described within the Design Report provides a range of visual imagery for consideration.
Detail Issues	
<p>The Panel supports the interpretation strategy throughout the building, but questions whether there is a need for a dedicated cultural “museum” space.</p>	<p>The cultural space is intended to be publicly accessible allowing for the public to enter and develop an understanding of the history of the Sandstone Precinct through the use of moveable heritage into this space, rotated on a curated basis.</p>
<p>It does not support the opening of the floor of the Strongroom to the lower ground floor.</p>	<p>The existing Strong Room ground floor is to be retained. The proposal focuses on returning the Strong Room to its original volume, by removing the intrusive floors that were introduced in the 1950’s. Along with the floors it is proposed that the partitioning, ducting and structure in the centre of the room is to be removed. The high-level proposal is to conserve the mezzanines at Ground and Level 01 and remove the mezzanine at Level 02. The retained mezzanines and stairs will have restricted access.</p>
<p>It supports the strategy for fire egress, noting that the changed use generates lesser impacts on the building fabric.</p>	<p>Noted. The design has considered fire egress as a key factor.</p>

DRP Advice	Response
<p>The Panel questions the introduction of the multi-story slot in the north courtyard north elevation (where the lifts are removed), noting it is a striking new element but the only element with such strong verticality, and that alternative expressions should be investigated. The Panel notes that the original building is ordered by the strength of its horizontal composition.</p>	<p>The slot is intended to introduce natural light into the northern part of the building through the opening of the multi-storey levels to the courtyard. This also introduces alternative views down into the de-cluttered courtyards. The two lifts and associated fire-egress stair align with the location of the original Northern Stair located opposite the Bridge Street entry. When these works were initially undertaken in the 1950's a portion of the Northern Courtyard facade was demolished and alterations were made to the Southern side of the Northern Dome. In removing this redundant vertical circulation there is a need to address the impact of this earlier demolition and intrusive works. Further articulation will be explored in detail design phases for the façade detailing to strengthen the horizontal expression/ composition.</p>
<p>The Panel supports the strategies outlined for services placement and distribution, understanding that there is much detail resolution to follow.</p>	<p>Detail of services distribution are continuing to be developed and will be provided to the DRP at upcoming meetings.</p>
<p>It supports the new roof strategy for uses and the new links within the height of the existing roof, so they are not seen from the outside. It believes that the links should be pulled back from the edge of the courtyard parapet so that they are not seen from the courtyard, and to increase the sun and light into the courtyard.</p>	<p>Noted. The approach to these required link insertions is to be reversible and to have minimal visual impact. The extent of the insertion is to occur within the height of the existing roof and would not be visible from the surrounding streets. It is proposed to retain as much of the existing roof structure and trusses as possible. The inner half of the pitched roof, including structure and trusses are to be removed to allow the introduction of the linking corridors. The corridors are to have glazed elevations facing into the Northern Courtyard. The link insertions shall be pulled-away from the sides of the Northern Dome & Tempietti.</p>
<p>The Panel supports the roof terraces in the current location, but not the extended terraces to the south as they further interrupt the sun and views from the newly opened courtyards. It questions the use of glass balustrades and the potential for reflections into the major public space of Macquarie Place.</p>	<p>It is proposed to make the Terraces functional extensions of the hospitality activity in the Northern Dome. The terraces shall be accessed through large arched glazed openings. These contemporary opening shall be clearly expressed as new elements. Structural and safety upgrades are required to make the terraces usable. New structural supports are proposed below the Terraces, as the existing roof trusses have not been design to handle large live loads. New stone flooring is to be laid. The existing balustrade is durable cast iron and has some light corrosion, it is to be made good as required. A new balustrade (glazed or vertical bar) shall be installed inside the existing balustrade, at a compliant height and spacings. Careful consideration of the balustrade will be undertaken to ensure the contemporary upgrades are sympathetic to the original balustrade and the potential views to the terraces from the surroundings.</p>
<p>The new roof material should ideally be a noble metal such as copper or zinc, or at least of a colour similar to the original slate roofs.</p>	<p>The roof material proposed is metal panel sheeting of a warm dark grey colour. The pitched roof areas will be either standing seam metal sheeting, coloured to match the existing slate roofing or slate. Slate was the original roofing material.</p>

2.0 Modifications to Conditions

For completeness, the conditions requiring amendment in order to facilitate the proposed design changes (including those made in response to submissions) are outlined below. Words proposed to be deleted are shown in ~~bold strike through~~ and words to be inserted are shown in **bold italics**.

2.1.1 Schedule 1 - Description of Development

The modified description of the development is summarised as follows:

Stage 2 development consent for the adaptive reuse of the Sandstone Precinct for tourist and visitor accommodation, including:

- demolition of existing improvements and alterations to the Lands and Education Buildings
- maximum gross floor area (GFA) of ~~30,683~~ **30,329**m², with ~~10,819~~ **10,465**m² in the Lands Building and 19,864m² in the Education Building
- maximum of ~~290~~ **229** hotel rooms, ~~with 61 in the Lands Building and 229~~ in the Education Building
- fit out of ancillary guest and visitor facilities
- ~~improvements and construction of a roof extension to the Lands Building, with a maximum height of RL 38.00~~
- construction of a roof extension to the Education Building, with a maximum height of RL 60.03
- excavation and construction of three basement levels and a subterranean link beneath Loftus Street, provision of loading bay facilities and 60 bicycle parking spaces

Justification

The amendment to the room numbers and roof description are a result of the proposed modifications to the development.

2.1.2 Condition A3 – Terms of Consent

A3 The Applicant, in acting on this consent, must carry out the development:

- a) in compliance with the conditions of this consent
- b) in accordance with all written directions of the Secretary
- c) generally in accordance with the State significant development application SSD 7484 Environmental Impact Statement prepared by JBA Urban Planning Consultants Pty Ltd, dated November 2016
- d) generally in accordance with the State significant development application SSD 7 484 Response to Submissions report prepared by JBA Urban Planning Consultants Pty Ltd, dated April 2017
- e) generally in accordance with the State significant development application SSD 7484 Response to Request for Further Information prepared by Ethos Urban, dated 6 December 2017
- f) the Section 4.55(1) modification application (SSD 7484 Mod 1) prepared by Ethos Urban Planning Consultants dated 26 and 30 April 2018
- g) the Section 4.55(1A) modification application (SSD 7484 Mod 2) prepared by Ethos Urban Planning Consultants dated 6 August 2018
- h) the Section 4.55(2) modification application (SSD 7484 Mod 3) prepared by Ethos Urban Planning Consultants dated 16 October 2018
- i) the Section 4.55(2) modification application (SSD 7484 Mod 4) prepared by Ethos Urban Planning Consultants dated 10 May 2019 and Response to Submissions dated 25 October 2019***
- ~~i~~ j) generally in accordance with the endorsed conservation management plans, prepared by GBA Heritage dated May 2017 and endorsed by the Heritage Council NSW, June 2017
- ~~j~~ ***k***) remediation in accordance with the Preliminary Remediation Action Plan prepared by Environmental Earth Sciences, dated 14 December 2017 (if required)
- ~~k-l~~) in accordance with the following drawings:

Demolition Drawings prepared by Make + Ridley Architects + Hassell			
Drawing No.	Rev.	Name of Plan	Date
SP-DA-G-1500	02 03	Proposed Site Plan	28.09.18 08.05.19
SP-DA-G-2295	05	Demolition Plans Education Building – Basement Level 03	14.08.18
SP-DA-G-2296	05	Demolition Plans Education Building – Basement Level 02	14.08.18
SP-DA-G-2297	05 06	Demolition Plans Lands Building – Lower Ground Education Building – Basement Level 01	14.08.18 08.05.19
SP-DA-G-2298	05 06	Demolition Plans Lands Building – Lower Ground Mezzanine	14.08.18 08.05.19
SP-DA-G-2299	06 07	Demolition Plans Lands Building –Ground Education Building – Lower Ground	14.08.18 08.05.19
SP-DA-G-2300	06 07	Demolition Plans Lands Building – Level 01 Education Building – Ground	14.08.18 08.05.19
SP-DA-G-2301	06 07	Demolition Plans Lands Building – Level 02 Education Building – Level 01	14.08.18 08.05.19
SP-DA-G-2302	06 07	Demolition Plans Lands Building – Level 03 Education Building – Level 02	14.08.18 08.05.19
SP-DA-G-2303	06 07	Demolition Plans Lands Building – Level 04 Education Building – Level 03	14.08.18 08.05.19
SP-DA-G-2304	06 07	Demolition Plans Lands Building – Level 05 Education Building – Level 04	14.08.18 08.05.19
SP-DA-G-2305	06 07	Demolition Plans Lands Building – Level 06 Education Building – Level 05	14.08.18 08.05.19
SP-DA-G-2306	05 06	Demolition Plans Lands Building – Level 07 Education Building – Level 06	14.08.18 08.05.19
SP-DA-G-2307	05 06	Demolition Plans Lands Building – Level 08 Education Building – Level 07	14.08.18 08.05.19
SP-DA-G-2308	06 07	Demolition Plans Lands Building – Level 09 Education Building – Level 08	21.08.18 08.05.19
SP-DA-G-2309	05 06	Demolition Plans Lands Building – Level 10 Education Building – Roof	14.08.18 08.05.19
SP-DA-G-2310	06 07	Demolition Plans Lands Building – Level 11 Education Building – Roof	21.08.18 08.05.19
SP-DA-G-2311	06 07	Demolition Plans Lands Building – Level 12 Education Building – Roof	21.08.18 08.05.19
SP-DA-G-2312	06 07	Demolition Plans Lands Building – Level 13 Education Building – Roof	21.08.18 08.05.19
SP-DA-G-3100	06 07	Demolition Elevations Lands Building – South Education Building – South	14.08.18 08.05.19
SP-DA-G-3101	06 07	Demolition Elevations Lands Building – West	14.08.18 08.05.19
SP-DA-G-3102	06 07	Demolition Elevations Lands Building – North Education Building – North	14.08.18 08.05.19
SP-DA-G-3103	06	Demolition Elevations Education Building – East	14.08.18
SP-DA-G-3104	06 07	Demolition Elevations Lands Building – East	14.08.18 08.05.19
SP-DA-G-3105	06	Demolition Elevations Education Building – West	14.08.18
SP-DA-G-3400	07 08	Demolition Sections Lands and Education Building – Section 01	14.08.18 08.05.19

SP-DA-G-3401	06 07	Demolition Sections Lands Building – Section 02	14.08.18 08.05.19
SP-DA-G-3402	07	Demolition Sections Education Building – Section 03	08.05.19
SP-DA-G-3150	00	Demolition Courtyard Elevations Lands Building – North Courtyard	08.05.19
SP-DA-G-3151	00	Demolition Courtyard Elevations Lands Building – South Courtyard	08.05.19
Architectural Drawings prepared by Make + Ridley Architects+ Hassell			
SP-DA-G-2496	04	Proposed Plans Education Building – Basement Level 03	06.12.18
SP-DA-G-2947	04	Proposed Plans Education Building – Basement Level 02	06.12.18
SP-DA-G-2498	04 05	Proposed Plans Lands Building – Lower Ground, Education Building – Basement Level 01	06.12.18 08.05.19
SP-DA-G-2498-M	00	Proposed Plans Lands Building – Lower Ground, Mezzanine, Education Building – Basement Level 01 Ground	08.05.19
SP-DA-G-2499	06 07	Proposed Plans Lands Building – Ground, Education Building – Lower Ground	06.12.18 08.05.19
SP-DA-G-2500	06 07	Proposed Plans Lands Building – Level 01, Education Building – Ground	22.02.19 08.05.19
SP-DA-G-2501	04 05	Proposed Plans Lands Building – Level 02, Education Building – Level 01	06.12.18 08.05.19
SP-DA-G-2502	04 05	Proposed Plans Lands Building – Level 03, Education Building – Level 02	06.12.18 08.05.19
SP-DA-G-2503	04 05	Proposed Plans Lands Building – Level 04, Education Building – Level 03	06.12.18 08.05.19
SP-DA-G-2504	04 05	Proposed Plans Lands Building – Level 05, Education Building – Level 04	06.12.18 08.05.19
SP-DA-G-2505	05 06	Proposed Plans Lands Building – Level 06, Education Building – Level 05	06.12.18 08.05.19
SP-DA-G-2506	04 05	Proposed Plans Lands Building – Level 07, Education Building – Level 06	06.12.18 08.05.19
SP-DA-G-2507	04 05	Proposed Plans Lands Building – Level 08, Education Building – Level 07	06.12.18 08.05.19
SP-DA-G-2508	04 05	Proposed Plans Lands Building – Level 09, Education Building – Level 08	06.12.18 08.05.19
SP-DA-G-2509	04 05	Proposed Plans Lands Building – Level 10, Education Building – Level 09	06.12.18 08.05.19
SP-DA-G-2510	03 04	Proposed Plans Lands Building – Level 11, Education Building – Roof	28.09.18 08.05.19
SP-DA-G-2511	03 04	Proposed Plans Lands Building – Level 12, Education Building – Roof	28.09.18 08.05.19
SP-DA-G-2512	03 04	Proposed Plans Lands Building – Roof, Education Building – Roof	28.09.18 08.05.19
SP-DA-G-2830	A	NLA Suite Area Plan	06.12.18
SP-DA-G-3200	05 06	Proposed Elevations Lands Building – South, Education Building – South	22.02.19 08.05.19
SP-DA-G-3201	05 07	Proposed Elevations Lands Building – West	22.02.19 08.05.19
SP-DA-G-3202	05 06	Proposed Elevations, Lands Building – North, Education Building – North	22.02.19 08.05.19
SP-DA-G-3203	05	Proposed Elevations, Education Building – East	22.02.19

SP-DA-G-3204	05 06	Proposed Elevations, Lands Building – East	22.02.19 08.05.19
SP-DA-G-3205	05	Proposed Elevations, Education Building – West	22.02.19
SP-DA-G-3210	04	Proposed Elevations, Education Building – Courtyard	28.09.18
SP-DA-G-3250	00	Proposed Courtyard Elevations Lands Building – North Courtyard	08.05.19
SP-DA-G-3251	00	Proposed Courtyard Elevations Lands Building – South Courtyard	08.05.19
SP-DA-G-3500	04 05	Proposed Sections, Lands and Education Building – Section 01	28.09.18 08.05.19
SP-DA-G-3501	02 03	Proposed Sections Lands Building – Section 02	11.10.16 08.05.19
SP-DA-G-3502	04	Proposed Sections Education Building – Section 03	28.09.18
SP-DA-G-4000	00	Façade Details Lands Building – NW Glass Roof and NE Pergola	17.10.16
SP-DA-G-4001	00	Façade Details Lands Building – Southern Metal Roof	17.10.16
SP-DA-G-4100	02	Façade Details Education Building – Glass Bay	28.09.18
SP-DA-G-4101	00	Façade Details Education Building – Glass Bay Corner	17.10.16
SP-DA-G-4102	02	Façade Details Education Building – Garden Villa	28.09.18
SP-DA-G-4103	02	Façade Details Education Building – East and West Tower	28.09.18
SP-DA-G-4104	01	Façade Details Education Building – Level 9 Infill Cladding	28.09.18
SP-DA-G-6000	05 06	Materials and Finishes Schedule	27.02.19 08.05.19

Justification

The amendments to plans are to reflect those changes proposed as part of this modification application.

2.1.3 Condition B9 – Heritage Interpretation Plan

The following information shall be submitted to the Heritage Council NSW or its delegate prior to the issue of the nominated Construction Certificate:

Documentation	Construction Certificate
Detailed drawings for all new, prominent elements, such as staircases and elevators, throughout both buildings	CC4 Structure
Further details regarding the proposed adaptation of the 'Strong Room' for use as a guest lounge in the Lands Building	CC4 Structure
Diagrams showing the method of reticulating new services throughout both buildings	CC5 Services
Details showing the proposed modifications to significant balustrades in both buildings	CC4 Structure
Further detailed design information, with input from a structural engineer, clearly indicating the impacts and implications of proposed works associated with the pool and spa in the Education Building on the place's heritage significance and fabric	CC4 Structure
Further detailed design information, with input from a structural engineer, clearly indicating the impacts and implications of proposed works associated with the rooftop water "villa" in the Education building	CC4 Structure
Details of junction between the exceptionally significant roof structures and the replacement roof	CC4 Structure

Documentation	Construction Certificate
<p>Elevations showing proposed alterations to exceptionally significant roof structures at the Lands Building. It is recommended that alterations to significant fabric are minimised and that the new roof is designed so that it can be removed without permanent damage to the significant structures.</p> <p><i>Details showing the rooftop link insertions to the Lands Building, along with details and specifications of the finish material and clean-up of preserved roof.</i></p>	<p>CC4 Structure</p>

Justification

Condition B9 is proposed to be amended in relation to the Lands Building in order to reflect the revised design and associated (reduced) impacts to the rooftop.

2.1.4 Condition B22 – Storage and Handling of Waste

The building plans and specifications accompanying the Construction Certificate 4 – Structure (CC4) shall demonstrate that an appropriate area will be provided within the premises for the storage of garbage bins and recycling containers and all waste and recyclable material generated by this premises will meet the requirements of the Waste Management Plan, dated 11 December 2018 and prepared by the Mack Group **and the Operational Waste Management Plan for the Lands Building dated 12 September 2019 and prepared by Foresight Environmental** to the satisfaction of the PCA.

Justification

Reference to the Operational Waste Management Plan which applies to the Lands Building is to be incorporated into this condition, with the updated date reflected based on the changes made to clarify its inclusion of the City of Sydney’s Guidelines.

2.1.5 Condition B23 – Storage and Handling of Waste

The Waste Management Plan, dated 11 December 2018 and prepared by the Mack Group **and the Operational Waste Management Plan for the Lands Building dated 12 September 2019 and prepared by Foresight Environmental** is to be finalised and approved by the PCA prior to the first Construction Certificate for Foundations/In Ground Structure (CC3) being issued. The Plan shall be generally in accordance with Council’s *Policy for Waste Minimisation in New Development 2005* and include areas for back of house waste separation and collection. All requirements of the approved Waste Management Plan must be implemented during construction of the development.

Justification

Reference to the Operational Waste Management Plan which applies to the Lands Building is to be incorporated into this condition to reflect its application to the development with the updated date reflected based on the changes made to clarify its inclusion of the City of Sydney’s Guidelines.

2.1.6 Condition B27 – Environmental Performance

B27 Prior to the issue of the first Construction Certificate 4 - Structure, the Applicant is to provide a natural ventilation strategy to the satisfaction of the Secretary, prepared in consultation with the Government Architect NSW. This strategy is to demonstrate that the spaces created by the roof extensions to the ~~Lands and~~ Education Buildings will be comfortable for the intended use throughout the year, by exploring and implementing all reasonable opportunities to maximise the use of natural ventilation rather than mechanical ventilation and having regard to industry best practice.

Justification

Reference to the Lands Building is proposed to be removed as there is no longer any roof extension proposed.

2.1.7 Condition C7 – Construction Pedestrian and Traffic Management Plan (CPTMP)

C7. Prior to the commencement of any works on site the Applicant shall prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with the CBD Coordination Office and the Sydney Light Rail Team within TfNSW. The CPTMP needs to specify, but not limited to, the following:

- a) location of the proposed work zone
- b) haulage routes
- c) construction vehicle access arrangements
- d) proposed construction hours
- e) estimated number of construction vehicle movements
- f) construction program
- g) consultation strategy for liaison with surrounding stakeholders
- h) any potential impacts to general traffic, cyclists, pedestrians and bus services within the vicinity of the site from construction vehicles during the construction of the proposed works
- i) cumulative construction impacts of projects including Sydney Light Rail Project and Sydney Metro. Existing CPTMPs for developments within or around the development site should be referenced in the CPTMP to ensure that coordination of work activities are managed to minimise impacts on the road network
- j) should any impact be identified, the duration of the impacts and measures proposed to mitigate any associated general traffic, public transport, pedestrian and cyclist impacts should be clearly identified and included in the CPTMP.

The CPTMP is to be updated to reflect the approved MOD ~~3~~ **4** and submitted to the Coordinator General, Transport Coordinator for endorsement, prior to the issue of construction certificate ~~3~~ **4**.

Prior to the commencement of work, the Applicant shall submit a copy of the CBD Coordination Office endorsed CPTMP to the PCA and the Secretary.

Justification

This condition is to be updated to reflect this modification.

2.1.8 Condition F7 – GFA and Height Certification

A Registered Surveyor is to certify that:

- a) the development does not exceed the approved gross floor areas of the:
 - i) Education Building (19,864m² GFA)
 - ii) Lands Building (~~10,819~~ **10,465**m² GFA)
- b) the development (excluding satellite dishes and balustrades) does not exceed the approved extension heights of the:
 - i) Education Building (RL 60.03)
 - ii) Lands Building (RL 38.00).

Details shall be provided to the PCA demonstrating compliance with this condition prior to the issue of the final Occupation Certificate.

Justification

This condition is required to be amended to reflect the new GFA of the buildings.

2.1.9 Condition G1 – Hours of Operation

G1. The hotel and ancillary guest and visitor facilities uses within the hotel shall not operate outside the following hours:

Use	Proposed hours of operation
Hotel	24 hours / 7 days a week
Ballroom / event spaces / meeting rooms	6am – 2am / 7 days a week
Bars	6.30am – 2am / 7 days a week
Restaurants	6.30am – 10.30pm / 7 days a week
Gyms / pool / spas	6.30am – 10pm / 7 days a week
Guest lounges	24 hours / 7 days a week
Lands Building - Northern Terraces	7am – 12 midnight / 7 days a week

Justification

In line with the recommendations of WGE, it is proposed to limit hours of use for the external terraces on the Lands Building.

2.1.10 Condition G6 – Waste Collection

G6. Prior to an Occupation Certificate being issued and/or commencement of the use, whichever is earlier, the building owner must ensure that there is a contract with a licensed contractor for the removal of all waste. No garbage is to be placed on the public way, e.g. footpaths, roadways, plazas, reserves, at any time. In addition:

- a) garbage and recycling must not be placed on the street for collection more than half an hour before the scheduled collection time. Bins and containers are to be removed from the street within half an hour of collection
- b) the collection of waste and recycling must only occur between 7.00am and 8.00pm weekdays and 9.00am and 5.00pm weekends and public holidays, to avoid noise disruption to the surrounding area
- c) the storage and handling of waste associated with the premises must comply with the approved Waste Management Plan, dated 11 December 2018 and prepared by the Mack Group, **and the Operational Waste Management Plan for the Lands Building dated 12 September 2019 and prepared by Foresight Environmental**, and be generally in accordance with Council's *Policy for Waste Minimisation in New Developments 2005*.

Justification

Reference to the Operational Waste Management Plan which applies to the Lands Building is to be incorporated into this condition to reflect its application to the development with the updated date reflected based on the changes made to clarify its inclusion of the City of Sydney's Guidelines.

3.0 Conclusion

The proposed modification seeks approval for amendments to the design of the Sandstone Precinct:

- Modifying the internal layout of the Lands Building through removal of 61 guest rooms;
- Introduction of hotel amenities into the Lands Building including:
 - Food and beverage offerings and associated kitchen spaces;
 - Consolidation of bathroom facilities;
 - Business suites;
 - Library and lounge;
 - Event and function rooms; and
 - Activation of the strong room.
- Removal of the previously proposed diagrid at terrace level and extension of existing roof style across new internal walkways, including changes to materials; and
- Creation of publicly accessible terrace spaces and access into the northern dome, including a new mezzanine level.

Submissions were received from the DPIE, City of Sydney Council, Heritage Council of NSW, DPIE Environment, Energy and Science, Transport for NSW, Roads and Maritime Services, Sydney Metro, Environment Protection Authority and the NSW Government Architect. Responses to each of the issues raised in the submissions have been provided above.

The nature of the additional design changes made in response to submissions does not affect the conclusions of the original technical reports/statements prepared in support of Mod 4, covering BCA, access, heritage, fire engineering, traffic, waste management, acoustic and structural.

In accordance with section 4.55(2) of the EP&A Act, the Department may modify the consent as the proposed modification is substantially the same development to that approved under the original consent.

The nature of the proposed modifications represent further enhancements to the overall design and continue to ensure the project's original objectives are maintained.

In light of its merits and in the absence of significant environmental impact, we recommend that the proposed modification be supported by DPE. We trust that this additional information in response to each submission received is sufficient to enable a prompt assessment of the proposed modification. Should you have any queries regarding the above do not hesitate to contact Alexis or Chris on 9956 6962.

Yours sincerely,



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