

26 December 2019

218153

Mr Jim Betts
Secretary
NSW Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2001

Attn: James Groundwater, Senior Planning Officer

Dear James

RE: RESPONSE TO SUBMISSIONS 2 - UNIVERSITY OF NEWCASTLE HONEYSUCKLE CITY CAMPUS DEVELOPMENT (SSD 9262)

Ethos Urban has prepared this letter on behalf of the University of Newcastle in response to your letter dated 27 September 2019 regarding the re-exhibition of the amended Concept Plan (SSD 9262) for the University's Honeysuckle City Campus Development (HCCD).

In total, 9 submissions were received in response to the re-exhibition of the Concept Plan. The submissions were from Government agencies and the general public, including:

- The City of Newcastle Council;
- NSW Government Architect;
- Ausgrid, Newcastle;
- Subsidence Advisory NSW;
- Office of Environment and Heritage;
- Transport for NSW; and
- General public (3 submissions);

Of the 9 submissions, 2 objected to the proposal and 7 provided comments. No objections were received from Government agencies.

This letter provides a response to the key remaining issues identified by the Department and addresses all comments made by other agencies and the public. Where individual issues are not discussed in this letter, a response can be found in the table at **Attachment A**.

This Response to Submissions report is accompanied by:

- Public Domain Strategy and Staging Plan prepared by Oculus (**Attachment B**);
- Public Domain Staging Plan prepared by Oculus (**Attachment C**);
- Wind Study prepared by Windtech (**Attachment D**);
- Addendum Transport Access Strategy prepared by SECA (**Attachment E**); and
- Revised Design Guidelines prepared by Cox (**Attachment F**).

1.0 Public Domain

The Department has requested further detail within the public domain strategy to clearly identify the hierarchy of public domain spaces throughout the university campus and their intended function and character, including desired locations for activation, hard and soft landscaping, public art and water sensitive urban design strategies.

Oculus has prepared a Public Domain Strategy (**Attachment B**) to support the Cox Concept Masterplan which provides additional details on the proposed use and landscaping of the various areas of public domain across the campus. The strategy is informed by the surrounding site context and aims to reinterpret the bushland setting of the Callaghan campus to the west of the city, the harbour to the north, the cultural heritage to the east and urban grid of Newcastle to the south. It has been developed to provide an active ground plane that responds to a variety of site constraints and provide a diversity of spaces for the University staff and students, as well as the broader community.

The Public Domain Strategy includes a distinct hierarchy of spaces which reflect different uses throughout the day and into the evening. Some are associated with the ground floor uses of the buildings while others provide areas for passive recreation that cater for different sized groups. Other areas form transitional spaces for students and staff to pass through but still allow people to occupy and dwell. The Public Domain Strategy is focused around the following key spaces (refer to **Figure 1**):

- **Turntable Plaza:** a celebration of the site's history with reference to the historic rail turntable infrastructure which will be transformed to become the active hub of the campus. Allowing for overland stormwater flows, the adjacent raised building spill-outs create a gentle amphitheatre and plaza space with room for markets, performances and community activities.
- **Honeysuckle Green:** The Green sits adjacent to the Turntable Plaza and takes advantage of its north facing aspect which maintains lunchtime sun throughout winter and summer. Honeysuckle Green provides opportunities for respite, relaxation and outdoor learning and, combined with Turntable Plaza, acts as the main spaces for students and staff.
- **Wrights Walk:** Forms the main east west pedestrian connection through the campus and is planted with native trees, shrubs and grasses with bioswales to encourage water sensitive design and help connect the site to its sister bushland campus at Callahan.
- **University Links:** Referencing the Masterplan's overarching design principles, the University Links provide a connection back to the fabric of Newcastle and Hunter Street; providing a series of smaller scaled spaces with a variety of public amenity, sport and art interventions.
- **Civic Lane:** Comprising service entries, street tree planting and opportunities for existing businesses to front the northern campus district.

An indicative Public Domain Staging Plan (**Attachment C**) has also been prepared as part of the strategy in accordance with a request from the GANSW's submission. This is intended to be a living document that will have the flexibility to inform and respond to the final use and detailed design of future buildings as the campus evolves over the coming years. In this regard, we would request that the strategy be conditioned to require Secretary approval for the initial strategy and subsequent amendments to avoid the need for any unnecessary s4.55 modifications.

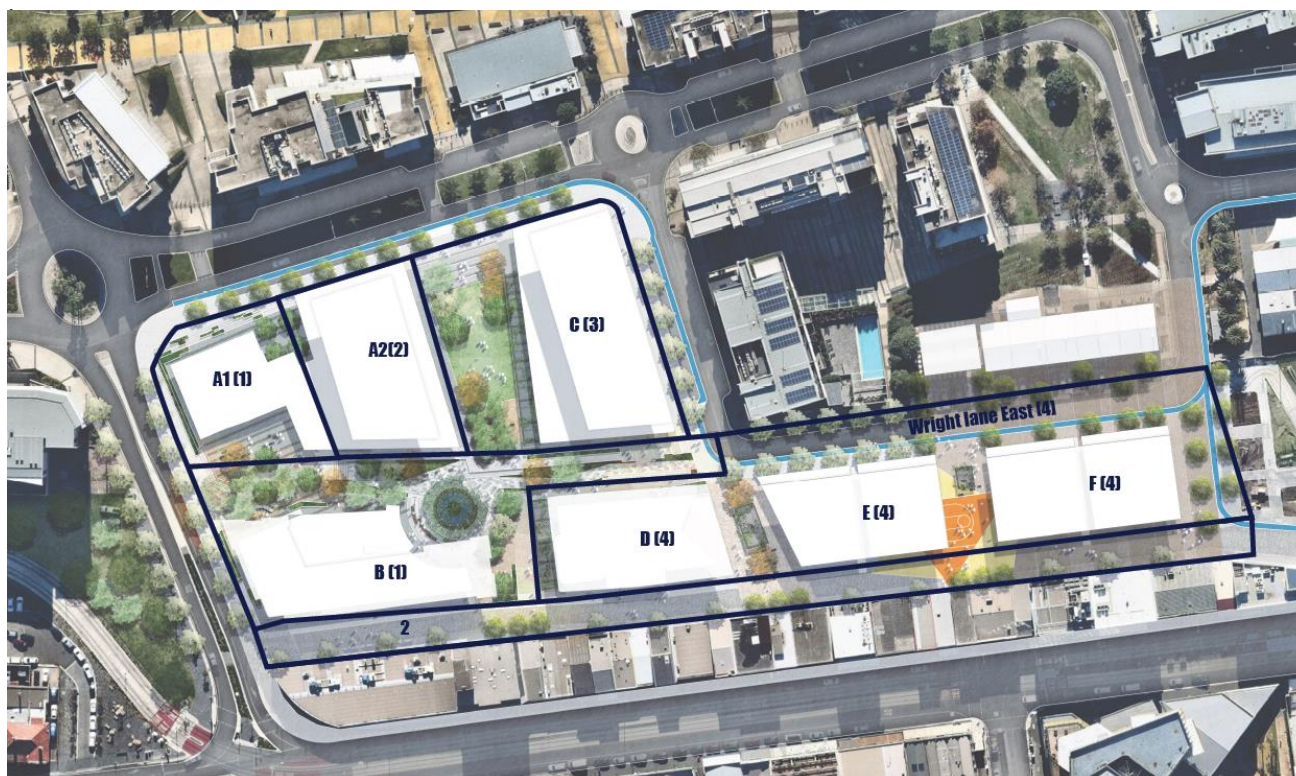


Figure 1 Extract of Public Domain Plan

Source: Oculus

2.0 Building Envelopes

The Department has requested further consideration of refinements to the building envelopes to minimise amenity and heritage impacts as well as reconsideration of building efficiencies to provide flexibility within the envelopes to achieve design quality in future stages.

2.1 Internal Amenity

Solar Access

The Concept Plan has been developed to optimise solar access to the public domain within the site, particularly around the two main student gathering places of Honeysuckle Green and the Turntable Plaza, whilst providing opportunities for shade in the summer. Unlike street-edge developments, such as the residential/hotel complex to the east of the campus which overshadows its own public spaces, the HCCD Concept Plan has north facing spaces that receive full sun through the middle of the day in mid-winter. The solar access study at **Figure 2** shows that most of this primary open space receives in excess of 3 hours sunlight at mid-winter. The Public Domain Strategy has also been designed to respond to the opportunities and constraints presented by the site's solar access attributes by offering a diverse range of spaces to provide an overall balance of shade and solar access across the campus. Different areas of the campus will receive amenity at different times of the day so whilst the open space at the western end of the site will be shadowed in the morning, it will receive solar access in the afternoon. The subsequent detailed design process will seek to optimise the use of each space in context of its microclimate.

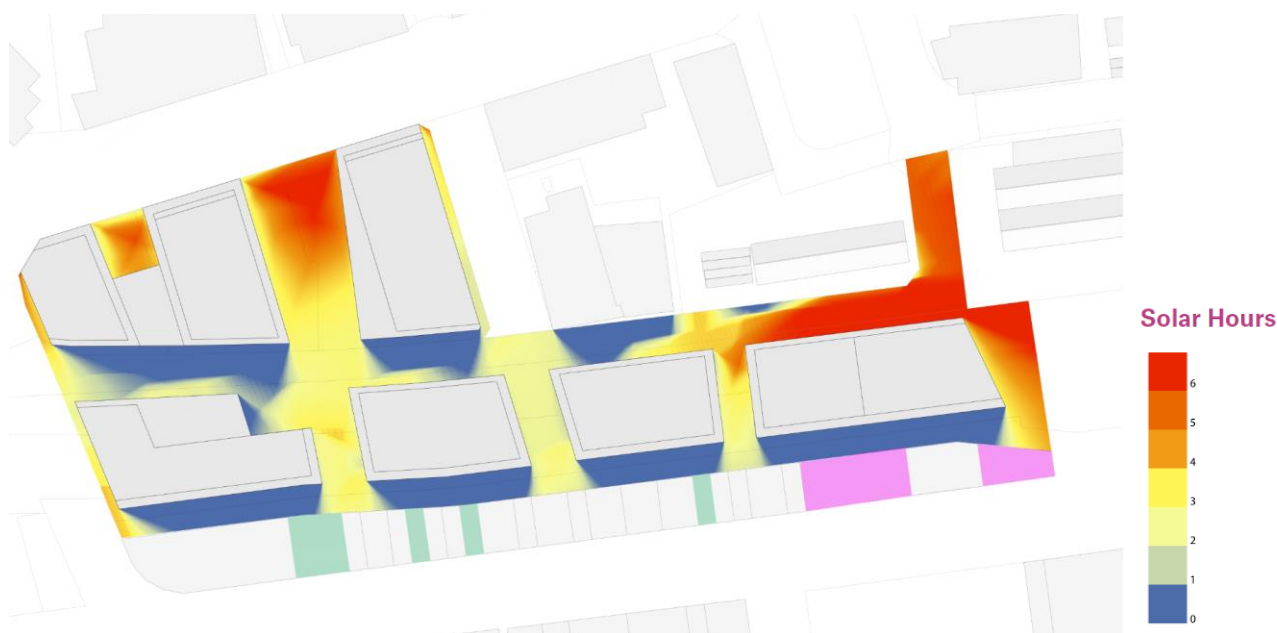


Figure 2 Solar access to public domain

Source: Cox

Wind Impacts

A Wind Impact Assessment has been prepared by Windtech and is provided at **Attachment D**. This assessment has studied the existing wind conditions in the locality and the potential effect of the proposed building envelopes on the public domain. The assessment relies on a visual inspection and analysis of the reference scheme design, with no wind tunnel testing deemed necessary for the exercise.

The assessment found that the site is relatively exposed to prevailing winds due to the low-rise surrounding structures and that certain areas may be prone to adverse wind effects due to the interaction of the prevailing winds with the built form. These potentially adverse conditions include the funnelling of winds between buildings due to the alignment of the built form with respect to the prevailing winds (which is required to maximise solar access to the public domain and provide a connection with the harbour and Newcastle CBD), side-streaming and acceleration of wind around the various corners of the development and downwash.

In response to the wind conditions of the site, the following mitigation measures are recommended for consideration during the detailed design of the buildings:

- *Inclusion of proposed planting and vegetation throughout the site. Undergrowth such as shrubs or hedges are expected to further improve wind conditions;*
- *Inclusion of continuous awnings over trafficable areas below towers or podia of a significant height which are exposed to the prevailing winds;*
- *Inclusion of localised screening where longer duration activities are expected such as cafés, shopfronts and main entryways;*
- *Inclusion of operable screening to be utilised by the various retail tenancy owners for usability of outdoor spaces and patron comfort; and*
- *Inclusion of wind screens or planting within through-site links, and near the corners of buildings.*

With the implementation of appropriate wind mitigation measures at the detailed design phase, Windtech conclude that suitable conditions can be provided for the ground level pedestrian areas of the HCCD. The above wind mitigation measures will be explored as part of the subsequent detailed design applications for each building.

2.2 External Amenity

As identified in the previous RFI Report dated 19 July 2019, the solar impacts of the proposed building envelopes are considered to be acceptable given:

- With the exception of allowance for a lift overrun for Building B, the proposed envelopes comply with the maximum height controls recently established for the site under the Newcastle Urban Transformation and Transport Program Planning Proposal. It is emphasised that the planning controls adopted for the site will always produce overshadowing in this location as the controls have a higher maximum height limit to the north of the adjacent Civic Lane development, however the proposed Concept Plan has a reduced solar access impact on the adjacent Civic Lane properties compared to the Planning Proposal scheme.
- Development of the Civic Lane properties is highly constrained by the narrow depth of the block and the existing planning controls, including a requirement to not overshadow the southern footpath of Hunter Street which restricts the potential built form to under the current LEP height limit (refer to **Figure 3**). Considering that a residential development would require greater setbacks to comply with the DCP/ADG controls, a commercial development is more likely in this location which is a less sensitive land use in regard to potential overshadowing.
- The proposal has provided reasonable setbacks given the site's CBD context and in accordance with the applicable planning controls. Development is also consistent with the future street pattern for this part of the city as established by the recent approval of the subdivision DA which included the widening of Civic Lane and which this application has considered. In this regard, it is noted that the HCCD does not have a minimum setback control to Civic Lane under the DCP and that the proposed setback above the podium level is to meet the building separation distance of 12m under the ADG. Accordingly, the Concept Plan provides a 5m setback above the podium to Civic Lane which will be 7m wide once undertaken (equating to a total 12m separation distance).



Figure 3 Civic Lane Development Potential

Source: Cox

Notwithstanding the above, further design analysis has been undertaken by Cox and revised Design Guidelines have been prepared to improve this interface (refer to **Appendix E**). By increasing the setbacks and further opening the gaps between the proposed building envelopes above the podium levels, solar access can be improved to the neighbouring Civic Lane residential properties in the west. Across the precinct, the original podium planning has been reinforced and the following built form principles have been adopted (refer to **Figure 4**):

- Maintaining two storey podiums along Wright Lane and around Honeysuckle Green and the Turntable Plaza;
- Introducing new setbacks above a two storey podium on Honeysuckle Drive to better manage building scale and wind effects;
- Introducing a two storey podium setback 2m from the widened Civic Lane (which is 7m) on Lots B, D, E and F to improve the articulation and scale of buildings along this frontage and to increase the area and efficiency of education uses on lower levels of these buildings;
- The built form above the podium along Civic Lane will be setback 5m from the new Civic Lane boundary which maintains at least 12m separation to sites on the south of Civic Lane; and
- A new 3m setback above the two storey podium on buildings along Civic Lane (Lots B, D, E and F) improves solar access to buildings south of Civic Lane.

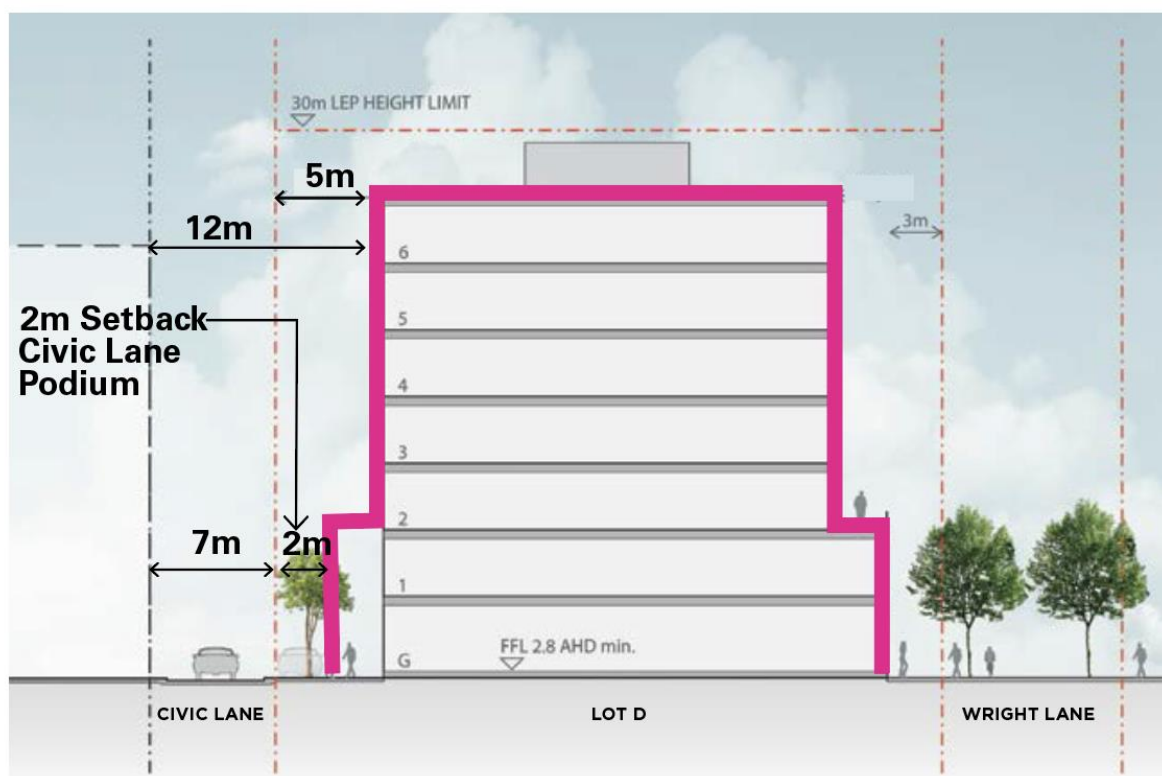


Figure 4 Revised Civic Lane Section

Source: Cox

Solar access to the existing residential properties has been prioritised over the existing commercial buildings in the east where solar access is not a key design consideration. As outlined above, any future development along this part of Civic Lane is more likely to be commercial based on the existing planning controls, site constraints and market conditions.

Figures 5 and 6 identify the solar access improvements resulting from the revised building envelopes. Of note is the increased solar access to the residential flat building at 522-526 Hunter Street which the majority of the north façade will now receive at least 2 hours solar access, mid winter. It is noted that the detailed design of the buildings along Civic Lane will seek to further improve this interface where possible.

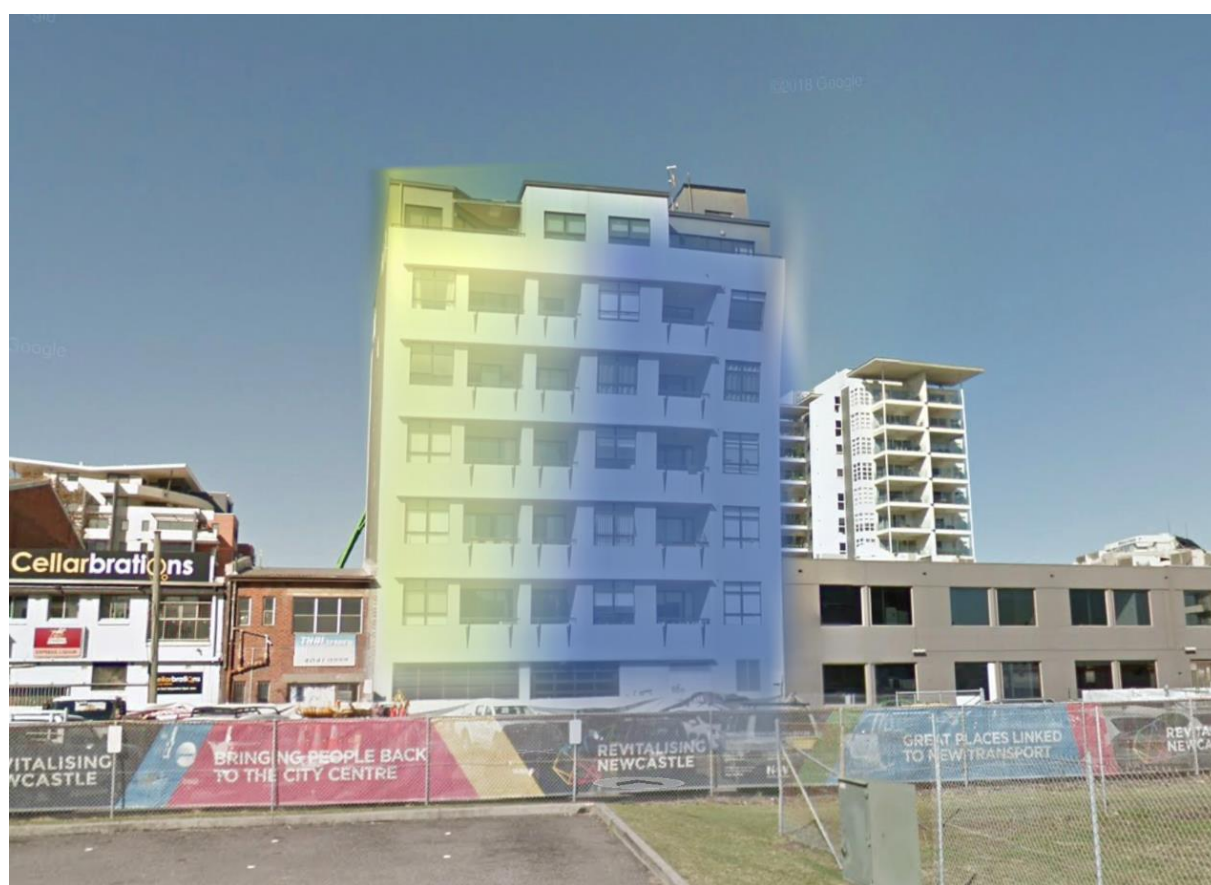
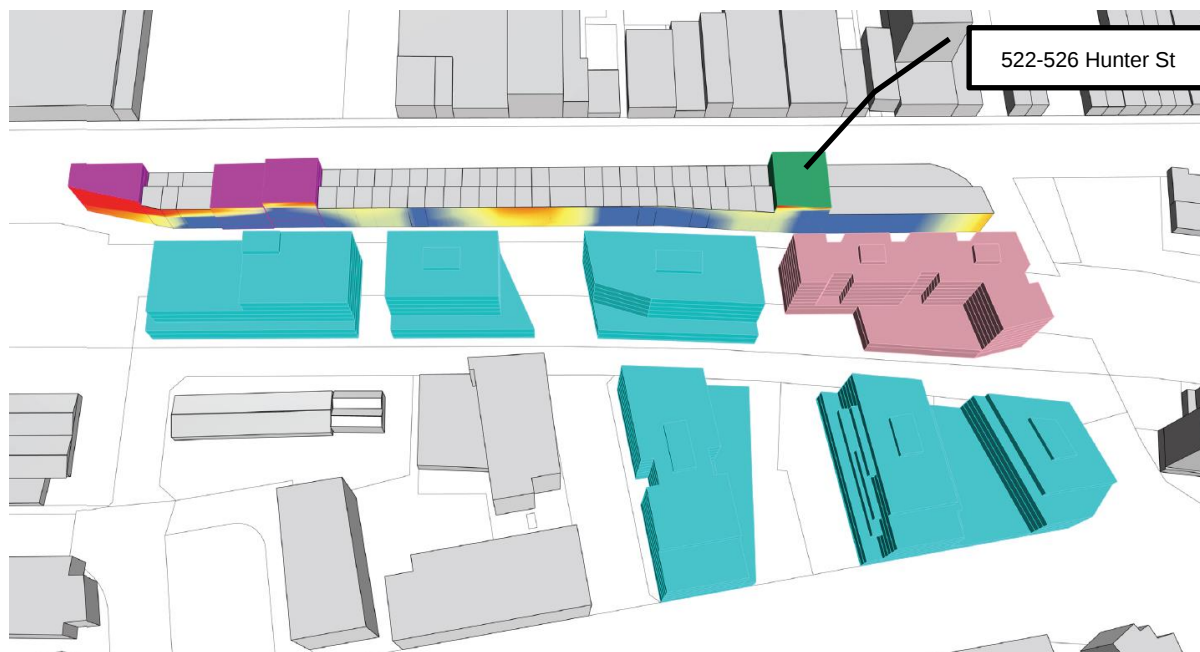


Figure 5 Overshadowing of previously proposed building envelopes

Source: Cox

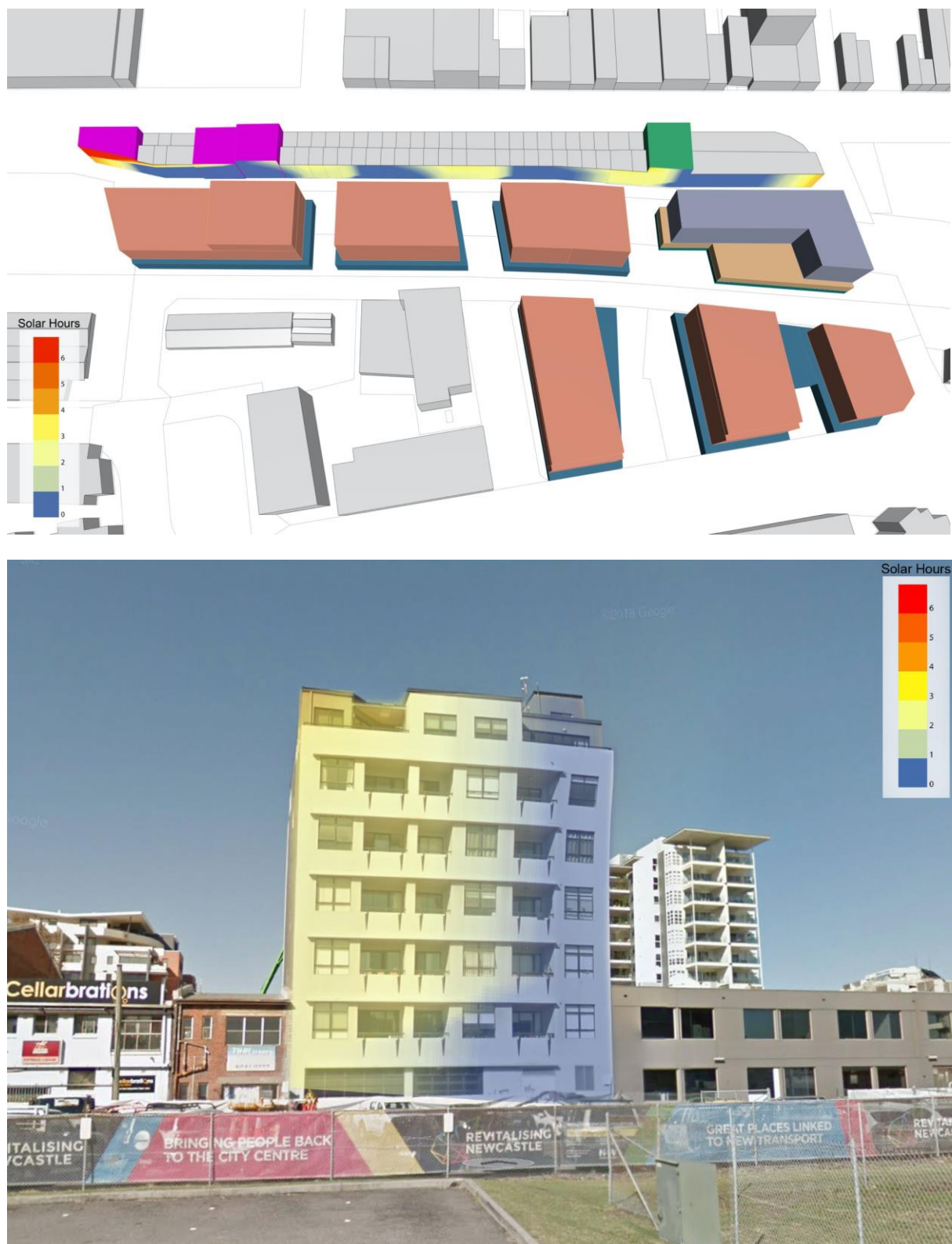


Figure 6 Overshadowing of amended building envelopes

Source: Cox

2.3 Heritage Impacts

The Heritage Council has recommended that the Concept Plan be revised to remove the proposed intrusion into the SHR curtilage to avoid the visual impact and impact on the setting of the Civic Railway Workshops.

The HCCD lies in part on the old Honeysuckle Point Railway Workshops which were constructed on landfill around the southern edge of Newcastle Harbour adjacent to the site. The Civic Railway Workshops is a group of early railway buildings (1874-1886) that are identified as both State and Local Heritage Items, comprising:

- Building A - 5 Workshop Way - The Permanent Way Store (Perway Store) (1881-2)
- Building B - 4 Merewether Street The Boiler Shop (1884-6),
- Building C - 6 Workshop Way - Smiths Shop (1884-6),
- Building D - 1 Wright Lane Boilerhouse and Machine Shop (1874-5),
- Building E - Wright Lane District Engineers Office (1886)

A curtilage is identified in the State Heritage Register for the Civic Railway Workshops. This includes part of the HCCD site north of Civic Lane, as shown at **Figure 7**.

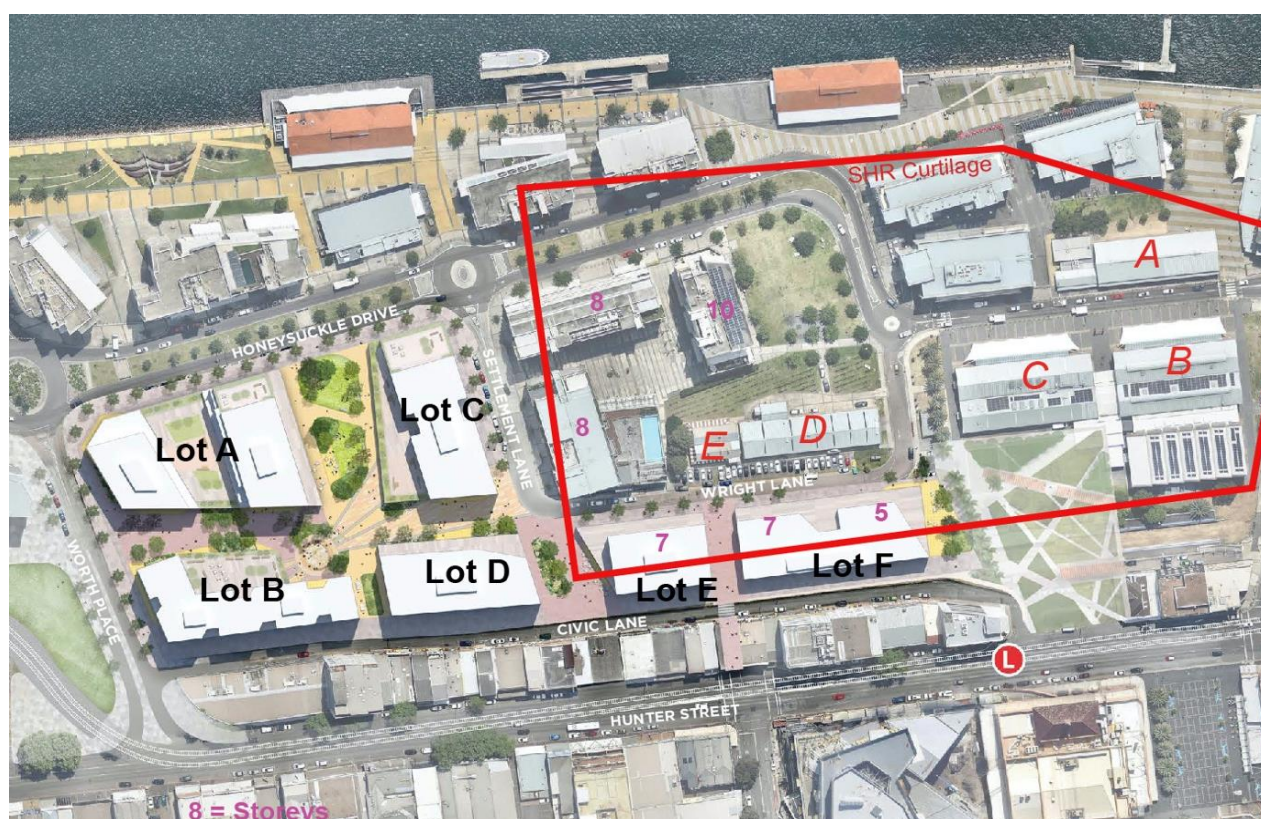


Figure 7 SHR Curtilage and Concept Plan

Source: Cox

Removing the proposed built form from the SHR curtilage would effectively result in the loss of Buildings E and F. This would be an unacceptable outcome for the University and would jeopardise the achievement of core objectives from State and local planning strategies which rely on the delivery of an expanded University campus in this location. The removal of the buildings from the SHR curtilage is also considered unnecessary in context of the existing surrounding built form and the opportunities for the proposed HCCD buildings and public domain to better respond to the Civic Railway Workshops Group.

As shown at **Figure 8**, the wider setting of the Civic Railway Workshops Group has already been impacted and altered by the presence of other existing developments within the SHR curtilage, including a residential and hotel complex to the west of the District Engineers Office which comprises 8-10 storey developments well within the curtilage. The southern curtilage comprises Wright Lane and an at-grade car park which forms part of the HCCD site.



Figure 8 Existing SHR Curtilage

Source: Google Streetview

As noted by Curio in the original RTS report, land located within the curtilage of SHR land does not preclude development. Rather, there are numerous examples of new development within the curtilage of SHR sites where development has been designed to minimise impact on and to the actual heritage items within the SHR curtilage, whilst still delivering positive heritage outcomes. Examples include, the Former Prince Henry Hospital, Randwick; The Mint, Sydney; Australian Technology Park, Eveleigh (former Eveleigh Railway Workshops).

Figures 9 and 10 provide a comparison of the existing and proposed built form massing around the Civic Railway Workshops Group. The building envelopes within the Concept Plan respond to the Civic Railway Workshops Group with reduced building heights in proximity to the SHR curtilage. Building F which is the closest building to the SHR curtilage, proposes a maximum of part seven and part five storeys, with only two storeys fronting Wright Lane. The introduction of a two story podium setback along Wright Lane responds to the scale of the Machine Shop and District Engineers Office. The built form has therefore been designed to transition down to provide a sympathetic scale to the Civic Railway Workshops Group. In addition, the Oculus Public Domain Strategy identifies this area for a fine grain, textural paving share way to present a new opportunity for the heritage building to front the campus and improve the existing character of this frontage.



Figure 9 Perspective of Current Context from North-East

Source: Cox



Figure 10 Perspective of Proposed Envelope Massing from North-East

Source: Cox

In this regard, the potential visual impact to the SHR curtilage can be more appropriately addressed through further detailed building and public domain design, including the use of materials and colour that are sensitive, and respond to, the heritage character of the nearby railway buildings. As discussed in Section 8.2.4 of the HIS submitted with the application, the detailed design of buildings in this location would include the use of neutral tones, and lightweight modern materials such as concrete and timber, avoiding the use of highly reflective surfaces, and bright white finishes. In this regard, the following condition is proposed to ensure due regard is given to this matter for future detailed design applications:

Future development applications for the detailed design of Buildings E and F, and any associated public domain, should demonstrate how the built form appropriately responds to the heritage curtilage of the Civic Railways Workshop Group.

Accordingly, it is considered that development within the SHR curtilage can be designed to minimise visual impact to the Civic Railways Workshops Group built heritage items, while improving the heritage setting and character through sympathetic design and finish, allowing the use and celebration of the space as a University campus.

3.0 Transport

The Department supports the long-term targets for mode sharing, however, has required further consideration on the mechanisms to achieve this and how parking demand will be met during the transition period.

SECA has prepared an addendum to the Transport Access Strategy (**Attachment E**) to outline how the mode share targets will be achieved in the short and long term. As detailed in the previous RTS report, the staged implementation of the HCCD will allow for a progressive shift to non-car modes of travel, along with improved transport and opportunities for city-based trip containment.

To address any short term demand for parking during the transition period, a number of opportunities are available to the University to provide interim parking spaces, including the temporary use of the former at-grade railway parking at the site (approximately 180 parking spaces available) and the utilisation of the existing spare capacity within the Civic West car park (which is currently at 68% occupancy, meaning up to 48 parking spaces are available). The provision of any interim parking would be on the basis of restricted supply and user pays so as not to hinder the achievement of long term mode share targets by encouraging unnecessary vehicle trips. The utilisation of the parking would be monitored and reduced as the mode share targets of the Transport Access Strategy are achieved.

Accordingly, it is proposed that each stage of the HCCD be assessed against the specific transport requirements at the time of the application when the exact use of the building is known and when an up-to-date assessment of the transport system can occur. To facilitate this approach, it is proposed to impose the following condition of consent on the Concept Plan:

Future development applications for the detailed design of buildings should be accompanied by an assessment of the traffic and transport impacts on the surrounding road network. The assessment should detail provisions to promote non-car travel modes in accordance with the long-term mode share targets of the Concept Plan and, where considered necessary, outline opportunities for the provision of limited on and/or off-site interim car parking. Any interim car parking may be relinquished upon satisfaction of the Secretary that the long-term share targets are being achieved.

4.0 Clarification on Wright Lane

The Department has requested clarification as to the extent of works proposed to Wright Lane in the context of Clause 4.5 of the Newcastle LEP 2012.

Wright Lane will form an integral part of the HCCD public domain, forming the primary east-west link through the campus. As detailed in the Public Domain Strategy, and outlined at Section 1.0 above, Wright Lane will be redeveloped for a series of connected areas of open space, including Wrights Walk, Turntable Plaza and a renewed pedestrian/cycle share way. These components of the Concept Plan are 'significant' in that they will involve substantial construction works that are inextricably linked to the delivery of the campus.

Accordingly, the Concept Plan establishes significant development on the Wright Lane lots and therefore may be included within the site area calculation in accordance with Clause 4.5 of the LEP. This will be addressed through the subsequent detailed design applications.

5.0 Conclusion

We trust that the information provided satisfies the requirements of the additional information request. We look forward to the Department progressing the assessment of the application and to receiving a set of draft conditions for consideration in due course.

Should you have any further queries about this matter, please do not hesitate to contact me on 9409 4927 or cforrester@ethosurban.com.

Yours sincerely,



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Attachment A – Response to Submissions

Table 1 Response to Submissions

SSDA Submissions	Response
Newcastle City Council	
Student accommodation categorisation The RtS (Pg13) states that the proposed student accommodation component of the development, previously characterised in the Environmental Impact Statement as a boarding house, would now be characterised as ‘an educational use’. This new characterisation is not supported by a planning argument. The SEPP (ARH) 2009 is considered to apply to the development and it is appropriate some consideration is given to the required planning provisions, including car parking and floor space ratio, as part of the Concept Plan application.	Noted, if a type of student housing that falls within the definition of a boarding house is proposed in the future, the development standards of the Affordable Housing SEPP would be addressed as part of the detailed design application. This would include a requirement for bicycle and motorcycle parking in accordance with Clause 30 of the SEPP, however it is noted that there is no such development standard for the provision of car parking. Clause 29(e) of the SEPP includes a car parking control that, if achieved, cannot be used as grounds to refuse consent, but it does not necessitate the provision of car parking.
Amenity considerations While the likely positive contribution of the development to the revitalisation of the City Centre is recognised, the development should not unreasonably impact on the existing developments or the future development potential of the properties on the opposite side of Civic Lane. As such, consideration should be given to ensuring that these likely impacts have been satisfactorily addressed by the Concept Plan.	Refer to Section 2.0 above.
Car parking rates While the provisions of State Environmental Planning Policy (State and Regional Development) 2011 provide that a development control plan does not apply to State significant developments, in the absence of other appropriate standards the DCP, including the parking rates, has been used by the Department to assess other State significant developments in the Honeysuckle precinct. Therefore, it is considered appropriate that consideration be given to DCP 2012 in respect of the proposed development.	Consideration has been given to the DCP parking rates within the Transport Access Strategy. As detailed throughout the application and RTS documentation, the campus is proposing a sustainable campus travel plan, focused on discouraging private vehicle use, and therefore the DCP parking rates are not considered appropriate to meet this objective. Refer to Section 3.0 above.
State Environmental Planning Policy (Affordable Rental housing) (SEPP) (ARH)2009 The provisions of SEPP(ARH) 2009 apply to State significance development. Therefore, if the student accommodation component (i.e.400 rooms) of the development is being proposed under	As noted above, the 0.5 parking space control under the SEPP is not a development standard. Bicycle and motorcycle parking will be considered at the detailed design phase, in accordance with the SEPP requirements.

SSDA Submissions	Response
this policy consideration should be given to the relevant parking rate of 0.5 parking spaces are provided for each boarding room and the development standard of one parking space for a bicycle and motorcycle for every 5 boarding rooms.	
Alternative modes of transport The RtS acknowledges that the transition from high private vehicle usage to alternative modes could take time and accordingly there could be continued demand in the short term. It therefore suggests that the staged approach to the delivery of the campus over a 10+ year time period will provide opportunity to implement interim parking solutions during this transition period. The approach that each stage be assessed against specific transport requirements at the time (particularly when details of building use are known) is generally supported. The temporary use of the existing 180 space at-grade car park on site to manage the interim general parking demand is also encouraged. It is recommended the Concept Plan is amended to retain this parking facility. If the Concept Plan is to rely on alternative forms of transport in the longer term, then it is recommended this to be future proofed into any earlier stage. For example, it should integrate a generous target for bicycle parking (and possibly motorcycle parking) beyond those currently required under the DCP 2012, even if such facilities were underutilised in the early stages of the development.	Refer to Section 2.0 above. It is intended that the existing at-grade parking is made available as an option to manage any short term parking demand during the transition phase. Noted. This recommendation will be considered as part of the subsequent applications for the detailed design of each building along with any other initiatives to promote non-car modes of travel. A generous target for bicycle parking beyond those currently required under the DCP 2012 will be considered as part of each detailed design application.
Servicing While alternative modes of transport may in the future be able to reasonably cater for general staff and student demand on the campus it is considered that alternative transport cannot cater for the ongoing general servicing requirements for the Concept Plan. In this regard well considered and integrated servicing arrangements need to be considered, planned for and embodied into the Concept Plan design. Each subsequent Stage DA could then leverage off an integrated servicing arrangement approach rather than replicating individual servicing within each new building. In accordance with DCP 2012, service vehicle arrangements need to be accommodated on-site in a manner that is conveniently accessible for all stages of the development. Demand could include but may not be limited to: • Parking - service vehicle parking, disability parking, emergency services and any other servicing parking arrangements that cannot be managed by alternative transport modes. • Appropriate taxi/private vehicle and bus drop off/set down areas. Specifically given the proposal will be heavily reliant on shuttle services to the campus the DCP 2012 requires that bus set down facilities are provided near the main pedestrian access for educational establishments.	Noted. The Public Domain Strategy (Attachment B) includes a servicing plan for the campus which integrates facilities between buildings (i.e buildings A1 and A2) and promotes the use of lanes and side streets for servicing to minimise disruptions to the public domain. Consideration has been given to civil constraints that may impact the short and long term planning for the site servicing, including Settlement Lane's load limit which restricts heavy vehicles being able to circulate through the campus and surrounding sites. Servicing has also been considered in context of the Public Domain Strategy. Servicing will be considered further as part of each subsequent detailed design application and will be delivered in accordance with the principles of the servicing plan contained within the Public Domain Strategy.

SSDA Submissions	Response
Loading/unloading zone/s for largest anticipated heavy vehicle, including waste collection vehicles (consider in conjunction with waste management). The Transport & Parking Response indicates that servicing will occur on-street. The policy position under the DCP 2012 is that all servicing facilities are to be accommodated within the site with forward vehicle entry/exit. On-street servicing is considered on a case by case basis but generally only supported in circumstances where on-site servicing is not possible (e.g. constrained development sites). It is considered appropriate for a development of the scale of the Concept Plan that all servicing would occur within the site, ideally with access from either Civic, Settlement or Wright Lane. While specific parking servicing requirements can be developed to suit the Concept Plan as a general guide the DCP 2012, Section 7.03 Traffic, Parking & Access suggests a general rate of 1 space per 2,000m² of GFA for servicing parking. It is noted that some temporary on-site facilities may be required to service earlier stages until a final solution is implemented.	
Road Network Based on ownership changes, CN have reviewed the current situation and the following is recommended: - A right of public access over Lot 6 (Wright Lane) for both foot and vehicle traffic will be required. This is necessary to enable public access and private access to properties with access from Wright Lane. - CN be granted right of access over Lot 6 (Wright Lane) in favour of Lot 3 DP1111305 (Newcastle Museum) and access to the museum be maintained at all times. - Wright Lane and Settlement Way be restricted to 23 Tonne maximum loading, noting that Settlement Way currently has a load limit of 23 Tonne imposed due to road slab being the car park roof for private underground parking. - Settlement Lane be made one way northbound. - Road and footpath works be undertaken at Settlement Lane/Honeysuckle Drive intersection to enforce one way. - UoN be required to undertake permanent road widening works along Civic Lane as part of this development. This is to establish the widening approved as part of the subdivision to widen Civic lane to create a footpath zone. - Any future proposed dedication of Wright Lane will need to be consulted with CN and road design will need to meet relevant CN requirement. The above matter could be addressed by the imposition of an appropriate condition of consent.	These matters do not affect the current Concept Plan proposal and will be addressed as part of the subsequent detailed design process. In this regard, Council's recommendations are noted and will be further considered by the University as part of a subsequent detailed design application which relates to the delivery of the public domain.
Flood Management There are a number of references within the RtS documentation that indicate flood planning requirements inconsistent with the above-mentioned study. There are also several statements	Finished floor levels for the campus have been set at 2.8m in accordance with the site Flood Certificate. No basements are currently proposed for the campus as they are considered

SSDA Submissions	Response
that basement parking is restricted due to required flood levels, however this is not considered to be the case. The documentation appears to be indicating that the basement car park entry needs to be at the highest Probable Maximum Flood (PMF) level. Based upon Section 4.01 Flood Management basement entry can be set at the recommended Flood Planning Level (FPL), which in accordance with the Flood Certificate, is 2.8m Australian Height Datum (AHD). Having regards to existing site levels this would be approximately 0.5m to 0.3m above ground level and would therefore unlikely prevent basement parking being provided on the site. It is recommended that documentation be updated to reflect current flood planning requirements in accordance with the Honeysuckle Redevelopment Area Flood Study (BMT WBM, March 2018) and Section 4.01 Flood Management of DCP 2012. As outlined in CN previous submission the implementation of floodways is an important aspect for the overall flood management within the Honeysuckle Precinct. This is because flood planning levels are based upon an as built scenario including the establishment of appropriate floodways. Accordingly, the floodways identified under the Honeysuckle Redevelopment Area Flood Study (BMT WBM, March 2018) should be implemented as part of the first Stage to ensure adequate flood protection can be achieved.	unnecessary in context of the reduced parking strategy and would further restrict the design of the public domain.
Stormwater Design and Drainage and Infrastructure Management The RtS has 'noted' CN's previous advice regarding these aspects of the development and therefore no further advice is required. It is noted, however, that drainage infrastructure traverses the northern alignment of Wright Lane and consideration should be given to such infrastructure in the subsequent development application for stage of the campus.	Noted, this will be considered as part of the subsequent detailed design applications.
Contamination and Noise and Vibration The RtS agrees with CN's previous advice on consideration of these matters. Therefore, no further advice is necessary.	Noted.
Section 7.12 Development Contribution Plan While CN acknowledges the many likely benefits of the Honeysuckle City Campus and the importance of its location in the City Centre to support continued revitalisation, the payment of a local infrastructure contribution as provided for under the CN's Section 7.12 Newcastle Local Infrastructure Contributions Plan 2019 is important to providing essential community infrastructure that the city campus will also rely on. As noted in CN's previous submission, Circular D6 was last updated in 1995 prior to the introduction of s7.11 to the Environmental Planning and Assessment Act 1979. Local contributions assist CN in the implementation of our Cycling Strategy and the design and	It is noted that contributions will not be levied on the Concept Plan and this will be a matter for subsequent detailed design applications. Notwithstanding, while the revised Circular D6 "Crown Development Applications and Conditions of Consent" was formulated in 1995, it still remains the guiding document in relation to Crown applications and development contributions. Although the circular refers specifically to section 94 (now section 7.11/7.12) contributions, the principles remain relevant to contributions under Section 7.12. Crown activities provide facilities which lead to significant benefits for the public in terms of essential community services and employment opportunities and the activities are not likely to require the provision of public services and amenities in the same way as development

SSDA Submissions	Response
construction of cycleways. The Transport Strategy prepared to support UoN's City Campus relies on a mode share shift away from private vehicle use and towards active and public transport. The Transport Strategy notes that NeW Space Bike Hub usage data shows a significant uptake in 2019 over 2018 figures and the provision of further Bike Hub services in the city as part of the overall HCCD masterplan are planned to support this mode of transport. In order for cycling to be a valid alternative to private vehicle use, the provision of safe cycle ways into the city will be essential, in addition to any bike hub services. Local infrastructure contributions also assist CN to provide public domain works in the City Centre such as urban furniture, street plantings, upgraded footpaths and open space embellishments that will benefit students, staff and visitors to the new campus. Given the above circumstances, it is appropriate for the UoN to pay an appropriate levy to assist CN to provide these public works that will be of considerable benefit to the functioning of the new campus. The Section 7.12 Newcastle Local Infrastructure Contributions Plan 2019 became operational on 9 September 2019 and repeals the Section 94A Development Contribution Plan 2009 (Updated 2017) referred to in CN's previous letter regarding this development. However, the Savings and Transitional provisions of the Plan provide that a development application which has been submitted prior to the adoption of this Plan but not determined shall be determined in accordance with the provisions of the Plan which applied at the date of lodgement of the application. Therefore, the levies applicable under Part B-City Centre of the above s94A Plan apply to the development Night-time economy Since the public exhibition of the development application CN's first specific strategy for guiding the development of the city's night-time economy was adopted. It is requested that both the UoN and Department consider the publication 'Newcastle After Dark 2018-2022'.	undertaken with a commercial objective. Accordingly, the effect of this circular is, that where the applicant is a Crown authority and the development is for Educational Services, no contributions should be collected for open space, community facilities, parking, and general local and main road upgrades. As the proposed development is for the purpose of a new university campus, it is clearly development for the purposes of Educational Services. The exemption from payment of contributions relating to community facilities, public domain and new open space is considered appropriate, as the new campus will provide significant areas of accessible open space for public recreation, as well as a range of community facilities available for the general public. It is recognised that contributions may be levied for stormwater works. The Circular also states that consideration should be given to the Crown's role in providing a community service, the cost of which is accountable to all taxpayers in the State. The university is a not-for-profit public institution which relies on government grants (approximately 65% of funding), donations, and community funding to carry out its important educational role. The future use of the site and the proposed improvements are of an inherently public nature, providing crucial educational, cultural and economic benefits to the State and city of Newcastle. The levying of development contributions on the works would redirect taxpayer and other donated funds to Council. This would deprive the University of scarce funding relied upon, and specifically granted to the University, in order for it to provide an important State and regional service. Therefore, in accordance with the direction provided by Circular D6, an exemption from Council's Section 94A Development Contribution Plan 2009 and Section 7.12 Newcastle Local Infrastructure Contributions Plan 2019 is warranted. The objectives of the Newcastle After Dark strategy are supported and will be achieved through the HCCD. In particular, the future development will transform a large, vacant landholding in the city centre into an activated and vibrant precinct which offers a diverse range of creative uses associated with the University. The Public Domain Strategy has been developed to promote inclusiveness for both University stakeholders and the general public. Safety will be promoted through the implementation of CPTED principles during the detailed design phase.
Government Architect - SDRP	
Public Domain The plans require both more detail and ground-truthing of what is proposed. As a precedent of the level of detail required, see Lachlan Precinct Public Domain Strategy by the City of Sydney,	The Lachlan Precinct Public Domain Strategy is for a precinct of 17.5ha to be delivered by a series of private developers whereas the HCCD site is a 2.4ha site in single ownership and to be develop by the University. Accordingly, the level of detail outlined in the Lachlan Precinct

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which includes active frontage, massing, street types and materials, public art and furniture, pedestrian priority, tree planting and WSUD strategies. The underlying concern is that several spaces seem poorly resolved, particularly Wright and Civic Lanes, and the 'campus heart'. Massing combined with overshadowing and access all pose risks to the lanes' success. Lack of activation and useable pedagogic space pose risks to the campus heart. An overly optimistic activation target overall may detriment both Hunter Street retail and their own success. Consideration of staging is needed. A delivery plan that also considers the staged rollout of key elements like the bike hub (and staged activation) is still absent. As a minimum, we recommend detailed site sections, and a staging plan that includes activation and temporary facilities.	Strategy is not considered necessary for this Concept Plan. Notwithstanding, it is noted that much of the information outlined in the Lachlan Precinct Strategy already appears in the Concept Plan, Design Controls and Public Domain Strategy provided throughout the assessment period to date. Refer to Sections 1.0 and 2.0 above. A more detailed Public Domain Strategy has been prepared by Oculus to address these matters. An indicative staging plan has been provided at Attachment C.
Heritage and Narrative A nuanced response to heritage is required, both existing elements – turntable and nearby buildings, and lost elements such as the foreshore and tracks. The landscape concept is diagrammatic. Building F will dominate the heritage fabric to the north. Consider requiring a campus-wide strategy for both European and Aboriginal heritage (pre and post-contact) to be completed and submitted.	Refer to Section 1.0 above. The Oculus Public Domain Strategy provides further detail in relation to the landscape design and the incorporation of heritage features. Refer to Section 2.3 above. The Public Domain Strategy, Concept Plan and supporting Heritage Impact Study are considered to provide adequate detail to protect and celebrate the site's European and Aboriginal heritage through the detailed design process.
Design Quality - Building Efficiency and Sustainability Building efficiencies higher than 75-80% are unlikely to provide enough flexibility to achieve design quality, particularly university buildings which have specific programmatic needs. This was demonstrated in Stage 1A where the ratio of GFA: GBA (before reallocation) was ~78%. Any further GFA reallocation over time could also further undermine sensitive sites like Building F (see above). Consider refining the proposed built form envelopes to reduce the bulk, scale and overshadowing of the laneways and heritage fabric, and then cap the GFA at an amount equivalent to 80% of those envelopes.	Modelling the overall Gross Building Envelope (GBE) illustrates the maximum envelope available. Key setbacks around Wright Lane, the Honeysuckle Green and Turntable Plaza are excluded from the GBE footprint. This results in a potential maximum GBE of 131,704sqm. Based on the maximum GFA proposed, the ratio of GFA to GBE is approximately 50%. As shown in the diagram below, the proposed design envelope already represents a refinement of the GBE as the following elements have been factored in: • Setbacks at key frontages; • Definition of podium areas; • Includes external walls; • Includes voids; and • Excludes rooftop areas.

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Accordingly, the efficiency assumptions of the Concept Plan (85% for education and 80% for student housing) are already based on a refined GBE and therefore provide sufficient flexibility for the future detailed design.



Campus-wide sustainability can also contribute to design quality, particularly in an education context. Consider requiring a sustainability strategy.

A campus-wide Sustainability Masterplan has been submitted with the Concept Plan. In addition, the University has recently launched its Environmental Sustainability Plan 2019-2025 (<https://www.newcastle.edu.au/about-uon/our-university/sustainability>) which sets out the University's commitment to leading by example; and developing and maintaining its operations as sustainable communities. The Environmental Sustainability Plan is led by the need for tangible sustainable outcomes, including in the planning, design and operations of its facilities.

The University is committed to embedding Environmental Sustainable Design (ESD) principles through all its capital projects, with a particular focus on energy and CO2 reduction. This commitment will be applied to the Honeysuckle campus to deliver facilities that align with the University's environmental and social responsibilities.

The architectural expression could also be strengthened with typologies that better reflect university buildings and spaces – this is unlikely to be resolved except by redesign.

The WSU Parramatta Square model of flexible education/office floors has been identified as a potential model for Honeysuckle. Rather than developing purpose-built education-only spaces, the flexible floor plates allow the possibility of providing different mixes of education, office and start-up spaces.

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Relationship to Context The edge condition of the campus to its surrounds remains a concern, and relationship of street level to flood-free has evidently been a challenge for Stage 1A. The relationship to the heritage buildings to the north of Building F remains a concern. There are other missed opportunities – using foreshore / topography / railway track lines, for example (even if just to guide articulation). The sense of arrival has already been flagged – arrival from light rail stops could be better understood (and this would in turn inform the Stage 1A proposal, as the panel previously remarked). As a minimum, consider detailed site sections (proposed in 1) that show adjacent context, and specific design requirements for the arrival points. A better response to site may again require a redesign. Concern remains on the effect of wind on the campus layout, particularly the 'campus heart'. Consider requiring a wind study to be undertaken.	A Public Domain Strategy has been prepared in response to these matters which provides a framework for the delivery of an integrated campus with due consideration of the site's opportunities and constraints such as topography, flooding and heritage. The strategy incorporates opportunities to interpret the historic foreshore, topography and former rail line infrastructure. Refer to Section 2.1 and the corresponding wind study prepared by Windtech (Attachment D).
Subsidence Advisory	
SA NSW issued a Notice of Determination dated 18 January 2019 for a concept design at the site. The key conditions imposed in the determination included: • Remediation of the underlying mine workings via the emplacement of grout with a post grouting verification report to be supplied to SA NSW. • Remediation of previously drilled boreholes at the site. • Structures be designed to accommodate post-grouting residual mine subsidence parameters. • Establishment of survey marks to monitor any building movement due to subsidence. • Works-as-executed certification. Based on the changes to the concept design, should an amended building application be submitted, SA NSW will likely reach the conclusion that the previous conditions imposed in our Notice of Determination dated 18 January 2019 will remain appropriate.	Noted.
Transport for NSW	
The supporting documentation provided in the response to submissions and amended concept development application has been reviewed, and no further comment is provided.	Noted.
NSW Heritage Council	
It is noted that the amended concept plan proposes a maximum seven storey building envelope within the curtilage of the Civic Railway Workshops. Whilst the Heritage Council's recommended conditions relating to archaeology and external finishing and materiality of the	Refer to Section 2.3 above.

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proposed development have been noted by the applicant, concerns regarding the adverse impact of the proposed development due to its intrusion into the SHR curtilage of the 'Civic Railway Workshops' remain unaddressed. The 'Civic Railway Workshops' is significant as one of the 'outstanding industrial workshop sites in the State' and proposed development within the curtilage of the heritage item will have adverse heritage impact on the setting and character of the heritage item and on the views, as advised earlier. Therefore, the recommendation previously provided and listed below, remains valid and needs to be addressed before the proposal has irreversible damage to the setting of this State Heritage listed item: 1. It is recommended that the concept plan be revised to remove the proposed intrusion into the SHR curtilage to avoid the visual impact and impact on the setting of the Civic Railway Workshops.	
Public	
As an owner of a residential unit at 489 Hunter St Worth Place Apartments (looking in a Northerly direction at the development site), I object to the proposal in its current form for the following reasons. Unfortunately available drawings and documentation on the Major Projects Planning web site and at Newcastle City Council was poor regarding the Honeysuckle City Campus Concept Plan Proposal. I am assuming the proposal does not exceed maximum building heights on any of the buildings and is compliant with the Newcastle Local Environment Plan (NLEP) 2012. Being a key site close to Newcastle Harbour waterfront, it is imperative that the height limits in the NLEP are adhered to as the visual impact on neighbouring properties. I am hoping that consideration for ample car parking onsite is being incorporated in the Honeysuckle City Campus Concept Plan as parking around the area is limited now.	The majority of the built form complies with the height controls of the NLEP 2012. It is noted that localised, minor variations to the maximum building height are proposed to allow for lift overruns for Buildings A2 and B, and as such a written clause 4.6 variation request has been prepared and submitted with the application. Notwithstanding, the proposed variations will not exacerbate any visual impacts from surrounding properties beyond what would result from a complying development. The proposed variations will also be further considered and minimised through the subsequent detailed design process. Transport and parking have been key considerations of the HCCD and a strategy has been prepared to promote non-car modes of travel. This matter has been addressed at Section 3.0 above.
The applicant's response to submissions has failed to adequately address the severe lack of parking within the development. The development will remove two large car parks at the rear of the site when construction commences, and those car parks are currently fully utilized by workers and visitors in Honeysuckle during the week and on weekends. In addition to removing this existing valuable public parking, the development has virtually no parking despite being a major development which will be utilized by thousands of students and academic staff, including	Transport and parking have been key considerations of the HCCD and a strategy has been prepared to promote non-car modes of travel. This matter has been addressed at Section 3.0 above.

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student residents within the proposed student accommodation building. A residential tower would never be approved with zero parking for residents, so the student accommodation tower should not be approved with zero parking for residents. The severe lack of parking in the immediate area has resulted in a large number of businesses in Honeysuckle closing down as visitors have no where to park and no longer visit the area.	
The height of the student accommodation building significantly exceeds the LEP and the height is inappropriate for the site. It will impact the view corridor from Hunter St and impact property values.	The student accommodation building largely complies with the LEP height limit with only a minor variation to accommodate lift overruns. No significant view corridors will be impacted, and the matter will be further addressed as part of the detailed design.
General support for the project.	Noted.