

**ANGEL PLACE
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SYDNEY NSW 2000**

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10 November 2020

Mr Jim Betts
Secretary
NSW Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Attention: Karl Fetterplace (Senior Planner, Key Sites Assessments)

Dear Karl,

SSD-10454 | INTERCONTINENTAL HOTEL - STAGE 2 | RESPONSE TO SUBMISSIONS

1. INTRODUCTION

This 'Response to Submissions' (RtS) letter has been prepared on behalf of Mulpha (the Applicant) in response to the NSW Department of Planning's (DPIE) request for additional information of 19 October 2020, relating to SSD-10454 Intercontinental Hotel – Stage 2. The application was placed on public exhibition for 28 days (between 10 September 2020 to 7 October 2020). During this time, submissions were received from the following agencies:

- NSW DPIE.
- City of Sydney Council.
- Heritage NSW.
- Transport for NSW.
- EES.
- EPA.
- Royal Botanic Gardens and Domain Trust.

This letter addresses the key issues identified by agencies during the exhibition period. This RtS incorporates additional information and minor amendments to the design to address the issues raised. The amended plans and RtS demonstrate the strong public benefits associated with the project.

The proposal, which involves mostly internal refurbishments to the existing building, seeks to improve the operational capability of the hotel. The primary objective is to improve amenity for guests, ensuring the ongoing economic viability and competitiveness of a world-class international hotel. The refurbishment works will attract tourists (globally) to the Sydney economy, providing local employment and preservation of a State significant heritage asset, with minimal visual, bulk, overshadowing or operational impacts. Accordingly, the project is worthy of support from DPIE and should be approved.

2. OVERVIEW OF AMENDMENTS TO THE PROPOSAL

In response to the submissions received, the project team have provided:

- Additional information regarding the achievement of ‘design excellence’ in accordance with the Sydney LEP 2012.
- Additional information regarding the existing and proposed management of the bar spaces.
- Various minor clarifications, addressing DPIE and Council questions relating to rooftop plant, signage, consultant report assumptions, balustrade heights et cetera; and
- Including additional bicycle parking spaces, addressing the City of Sydney Council’s concern.

2.1. FURTHER ENVIRONMENTAL ASSESSMENT

In accordance with DPIE’s request, the following assessment is made against Sydney LEP 2012, Clause 6.21(4):

Table 1 – Sydney LEP 2012 Clause 6.21(4) Assessment

Provision	Response
<p>In considering whether development to which this clause applies exhibits design excellence, the consent authority must have regard to the following matters—</p>	
<p>(a) whether a high standard of architectural design, materials and detailing appropriate to the building type and location will be achieved,</p>	<p>The built form is within the approved Stage 1 envelope and achieves a high standard of architectural design through the selection of materials and detailing, enabling it to read as a lightweight steel and glass structure that is modest in expression and deliberately recessive. The extension will complement the existing building, while being subtly read within the surrounding CBD context.</p>
<p>(b) whether the form and external appearance of the proposed development will improve the quality and amenity of the public domain,</p>	<p>The proposed façade works at the Phillip/Bridge Street corner will improve the streetscape presentation of the hotel to the public domain.</p> <p>The Level 32 extension has been assessed to be acceptable on urban design and visual impact grounds (refer to the VIA lodged with the EIS for further information).</p>
<p>(c) whether the proposed development detrimentally impacts on view corridors,</p>	<p>The proposal is made in compliance with the Stage 1 envelope which set parameters for acceptable view corridors.</p>

Provision	Response
(d) how the proposed development addresses the following matters— (i) the suitability of the land for development,	The site is suitable for the development as addressed in Section 8 of the EIS.
(ii) the existing and proposed uses and use mix,	The proposed upgrade works to the hotel are classified as tourist and visitor accommodation, which includes hotel or motel accommodation. This is consistent with the existing use of the building.
(iii) any heritage issues and streetscape constraints,	The proposal is made in compliance with the Stage 1 envelope which set parameters for heritage and streetscape matters. It is noted that the application is supported by Heritage Impact Statement, which confirms that the proposal is acceptable on heritage grounds. This is supported by the Heritage NSW submission on the EIS package.
(iv) the location of any tower proposed, having regard to the need to achieve an acceptable relationship with other towers (existing or proposed) on the same site or on neighbouring sites in terms of separation, setbacks, amenity and urban form,	Consistent with the Stage 1 envelope, and as demonstrated in the EIS package, the proposed extension to the Level 32 Club Lounge will not result in any significant adverse visual bulk or overshadowing to the surrounding area. The proposal will not stymie or impinge on the development potential of adjoining sites.
(v) the bulk, massing and modulation of buildings,	The proposal is made in compliance with the Stage 1 envelope which set parameters for heritage and streetscape matters.
(vi) street frontage heights,	The proposal does not impact existing street frontage heights.
(vii) environmental impacts, such as sustainable design, overshadowing and solar access, visual and acoustic privacy, noise, wind and reflectivity,	Environmental impacts have been considered to be acceptable, as discussed in Section 6 of the EIS submitted to DPIE.
(viii) the achievement of the principles of ecologically sustainable development,	The Level 32 extension has been developed using high performing materials. Increased access to natural light, together with increased building insulation, will improve the environmental

Provision	Response
	performance of the building. The ESD Report submitted with the EIS demonstrates how the proposal can achieve the ESD principles and outlines a pathway to providing a suitable sustainability outcome.
(ix) pedestrian, cycle, vehicular and service access and circulation requirements, including the permeability of any pedestrian network,	The proposal does not alter access and/or circulation to the building.
(x) the impact on, and any proposed improvements to, the public domain,	The proposal will not have an adverse impact on the public domain, noting that it does not result in any additional overshadowing of the Royal Botanic Gardens or the Domain.
(xi) the impact on any special character area,	<p>The vertical extensions to the Level 32 club lounge will not be readily visible from Bridge Street and are not considered to detract from its streetscape character.</p> <p>The proposed external works to the Bridge/Phillip St façade and porte-cochere entrance space are considered to maintain and reinforce the streetscape character of Bridge Street.</p> <p>For further commentary on heritage impacts, refer to the Heritage Impact Statement submitted with the EIS.</p>
(xii) achieving appropriate interfaces at ground level between the building and the public domain,	As above, the proposed external works to the Bridge/Phillip St façade and porte-cochere entrance space are considered to maintain and reinforce the streetscape character of Bridge Street.
(xiii) excellence and integration of landscape design.	The proposal does not involve any landscaping, besides minor embellishment works to the porte-cochere involving planter boxes, which is considered acceptable from a design perspective.

3. DETAILED RESPONSE TO SUBMISSIONS

A response to the matters raised in agency submissions is provided in Table 2 below:

Table 2 – Detailed Response to Submissions

Comment	Response
<p>NSW DPIE</p> <p><i>In addition to responding to the issues raised in submissions, the Department requests that you provide:</i></p>	
<p>1. an assessment of the proposal against the design excellence criteria in clause 6.21(4) of Sydney LEP 2012.</p>	<p>Refer to Section 2.1 above.</p>
<p>2. confirmation of the capacity and operating hours of the existing ground floor and rooftop bars and whether these bars are open to the public, and if any amendments are proposed, an assessment of associated impacts.</p>	<p><i>Cortile Space</i></p> <p>The Cortile space currently operates as a casual reception and lounge area for both hotel guests and visitors – providing small meals, including alcohol.</p> <p>This SSDA seeks to refurbish the space so it operates more efficiently. The function (casual dining), operating hours and capacity will remain unchanged. Refer to p. 22 of the Design Report submitted with the EIS which illustrates the extent of changes proposed.</p> <p>On this basis, no additional environmental impacts are required to be assessed for this space.</p> <p><i>Level 32 Space</i></p> <p>The Club Lounge is currently accessed via lift from Ground Level and is only open to guests of the Hotel (or members of the IC Hotel chain). It is proposed that this space will be opened to the public because of the refurbishment works associated with this SSDA. The function of the space (bar/casual dining) will remain unchanged.</p> <p>Because of the refurbishment works, it is intended that the Club Lounge will extend its trading hours, within the bounds of the existing liquor license, as follows:</p>

Comment	Response
	<ul style="list-style-type: none"> • Monday to Thursday: 6:30am to 12 midnight. • Friday and Saturday: 7am to 1am. • Sunday 6:30am to 10:30pm (liquor trading from 10am to 10pm). <p>Note: the external deck area will shut at 11pm each night, aside from Sunday when it will shut at 10:30pm.</p> <p>The capacity of this space (115 people) is not proposed to change as part of this application.</p> <p>It is noteworthy that the Acoustic Report submitted with the EIS stated that because the capacity and function of the Club Lounge is unchanged, there would be no additional noise emission impacts and that noise emissions from the Club Lounge would be inaudible at the nearest residential receivers.</p> <p>Because there is a minor change associated with the Club Lounge space (i.e. minor increase in operational hours and transition to public access), an Outline Plan of Management has been prepared (Appendix A) in accordance with Sydney DCP 2012 requirements.</p>
<p>3. details about the proposed uses including “boutique offerings” and an assessment of any associated impacts.</p>	<p>The response to the above item outlines the existing and proposed operation of the bar spaces. All other existing uses, including Café Opera and the ground level food and retail outlet tenancies are not proposed to change.</p> <p>Upon clarification, DPIE confirmed that this query related to the anticipated staff increase. In answer to this, the intent of the refurbishment works is to create spaces with greater functionality and appeal, so they are (in turn) used for their desired purpose more frequently. It has been clarified to DPIE that “boutique offerings” is a hospitality term for increased visitor appeal, especially in a group booking setting.</p>

Comment	Response
	<p>Because of the upgrade works, it is expected that the bar spaces will be used at (or near) capacity more frequently. Because of this, hotel management have nominally estimated that up to 50 additional staff will be required to service the hotel.</p>
<p>4. further details of the proposed replacement plant and an assessment of impacts.</p>	<p>Woods Bagot have prepared a drawing (Appendix B) which confirms:</p> <ul style="list-style-type: none"> ▪ Existing FDU ductwork will be retained. ▪ Existing kitchen dishwasher hood to be replaced with two similar fans and relocated slightly northward to suit new kitchen layout. This hood is excluded from the calculation of building height under the standard template LEP definition and therefore, this relocation does not trigger a height or Stage 1 envelope non-compliance. ▪ Existing toilet exhaust fan to be retained or replaced on a like-for-like basis (to be confirmed at CC stage).
<p>5. confirmation that no additional signage is proposed.</p>	<p>We confirm there is no additional signage proposed. The proposal only seeks to refurbish existing signage.</p>
<p>6. confirmation of the current general waste and recycling levels.</p>	<p>The Waste Management Plan has been updated (Appendix C) to reflect a minor clerical error.</p> <ul style="list-style-type: none"> ▪ Existing waste generation: 860,689 litres per month. ▪ Proposed waste generation: 863,908 litres per month.
<p>7. Construction Management Plan Revision C prepared by Built, dated 4 August 2020. The Department notes the version provided with the EIS is Revision B, dated 30 July 2020.</p>	<p>We confirm that the CMP submitted for SSDA is the most current report. The revision noted on the front cover is/was a clerical error.</p>
<p>City of Sydney Council</p>	

Comment	Response
<p>8. While the proposal includes minimal new reflective glass, there is an opportunity for the addition to include a treatment or finish of glass that will reduce the likelihood of bird strikes. This can either be placing glass behind some type of screening or using glass with inherent properties that reduce collisions. Generally options include but are not limited to:</p> <ul style="list-style-type: none"> • Installing opaque glass or etched, stained, frosted glass and glass blocks. • Angled glass (popular in Europe and Asia), although reflectivity effects are more pronounced and require careful consideration. • Awning hoods and overhangs over windows to reduce reflectivity. • Patterns on glass (ceramic dots, “frits” with a specific 2 x 4 design). • Screens, shutters, exterior shades. <p>Ideally, the City recommends that all reflective glass within the development include treatments as the reflection of sky and/or vegetation increases the risk of impact as there is a clear line of sight.</p>	<p>We have undertaken due diligence / analysis on this matter using Birdlife Australia's 'Birds in Backyard Program' and do not consider the incorporation of specific glazing treatments (to mitigate bird strike) necessary for this project.</p> <p>Birdlife Australia outline a series of characteristics that place building features and facades ‘at risk’ of bird strike. These are summarised below in italic text:</p> <ul style="list-style-type: none"> • <i>Buildings with large areas of uninterrupted glass. (more than 80% glass coverage).</i> • <i>Transparent glazing which would allow clear views through to the other side of the building.</i> • <i>Glazing and/or surfaces that reflect sky or vegetation may be confused as an available flight path or habitat.</i> • <i>Landscaping features, such as resource-rich or fruit bearing trees, plants and water features bring birds closer to windows and increase the risk of collision.</i> • <i>Buildings close to abundant urban greenspaces with complex vegetation are hotspots for window collisions.</i> • <i>Abundant interior greenery which is visible from the outside of the building.</i> <p>While we note Council have recorded instances of birds striking CBD buildings, we do not believe the Intercontinental Hotel (which is characterised by heavy concrete facades, punctuated by half height windows) is an ‘at risk’ building using the criteria noted above.</p> <p>It is noteworthy that the Level 32 extension is located high above the ground level and will not reflect vegetation or sky.</p>

Comment	Response
	<p>Applying the principle of reasonableness and noting that the primary design objective of the Level 32 extension is to maximise uninterrupted views toward Sydney Harbour and the city skyline, the proposed glazing solution is considered appropriate for the development.</p>
<p>9. It is also noted that the architectural drawings show a 1m high balustrade along the terrace, however, the submitted wind report recommends a 1.4m high balustrade. It is recommended that the architectural drawings include this design change.</p>	<p>Upon re-checking the drawings, Woods Bagot have confirmed that the balustrade height measures 1.3m. The contention from Council that the balustrade height is 1m may be because the floor level is actually lower than where the glass element of the balustrade ends and the precast concrete upstand continues. For avoidance of doubt, a dimension has been added to the Woods Bagot drawings (Appendix D).</p> <p>It is noted that the submitted wind report mistakenly required a 1.4m balustrade. This has been corrected in a revision (Appendix E), which confirms that wind impacts can be successfully ameliorated through a 1.3m high balustrade.</p>
<p>10. It is recommended that at minimum, bicycle parking be increased to accommodate additional spaces reflecting the projected staff member increase. This will result in a total of 18 bicycle spaces being the 5 existing spaces plus 13 in accordance with the staff bicycle parking rates in the Sydney DCP 2012. The location of the additional bicycle spaces should be in close proximity to existing spaces and end of trip facilities. It is recommended that existing car spaces can be utilised for bicycle storage if they cannot be accommodated elsewhere.</p> <p>Ideally, the City would recommend a further increase in bicycle spaces to be more consistent with the recommended rates in the Sydney DCP 2012 and the Stage 1 consent. It is noted that there is further opportunity for an increase in on-</p>	<p>In light of Council's comment, we have undertaken further inspection of the basement area, which can viably accommodate an increase to the bicycle parking provision of 10 spaces (bicycle racks), equalling a total of 15 spaces.</p> <p>These racks will be located adjacent to the car park driveway from Bridge Street in Basement Level 1 (also known as Level 3) (refer to Appendix D).</p> <p>The 15 wall mounted racks will be provided with 500mm spacing between each rack, in accordance with the requirements of AS 2890.3. This arrangement has been reviewed by the traffic engineer to be both suitable and compliant with the relevant Australian Standards (refer to Appendix F).</p> <p>Any additional spaces to meet the numerical standard would be only accessible in Basement Level 2</p>

Comment	Response
<p>site bicycle storage and end of trip facilities with the future works to Transport House.</p>	<p>through the car park boom gate, and due to operational and security requirements would need to be restricted to staff only.</p> <p>From an operational perspective, it would be optimal for the 15 spaces to be accessible in front of the boom gate (for staff and guests), so as not to interfere with existing car park operations.</p> <p>Current usage indicates that only one (of the existing five) bicycle racks is occupied on occasions and the proposed threefold increase to 15 spaces represents a significant initiative toward meeting Council's objective to encourage more sustainable transport and bicycle use.</p> <p>It is also noteworthy that the Green Travel Plan identifies bicycles as one component of the overall sustainable transport mix available for staff and guests – which include buses, trains/metro, light rail, ferry and walking to the site.</p> <p>This SSDA seeks the refurbishment of the hotel and represents only part of the planned works covered by the Stage 1 approval. Bicycle provision and end-of-trip facilities will need to be reviewed with a future DA, in compliance with the conditions of the Stage 1 approval.</p>
<p>11. To ensure that the existing condition of public assets is maintained on Macquarie, Bridge and Phillip Streets, the City recommends that the developer ensure that all items within the site streetscapes are retained, protected and preserved during construction. Items included, but are not limited to footpaths, kerbs and gutters, signage, survey marks, street furniture, utility pit lids, lighting, street trees and adjacent carriageways.</p> <p>The City recommends all proposed works to the entry on the corner of Bridge and Phillip Streets be contained within the site and not impact the</p>	<p>Noted. The condition proposed by Council is acceptable to the Applicant.</p>

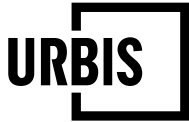
Comment	Response
<p>public domain. Any rectification works are recommended to be undertaken in accordance with Council standards and the recommended conditions of consent as provided in Appendix A attached to this letter.</p>	
<p>Heritage NSW</p>	
<p>12. The proposed retention and enhancement of the central cortile space is considered a positive heritage outcome. The design indicates a reasonable balance between the old and the new.</p>	<p>Noted.</p>
<p>13. The 1980s philosophy of conservation forms part of the significance of the item and retaining evidence of these works such as the elliptical stair and lift would enhance these values.</p>	<p>Noted.</p>
<p>14. Removal of intrusive elements installed during the 1980s development such as partition walls in the Strong Room, restaurant fitout on Level 6, later addition floor and wall finishes, etc. improve the general condition of the subject building and enhance its heritage significance.</p>	<p>Noted.</p>
<p>15. The design of the handrail located on Level 7 should be reconsidered to be more recessive. While the handrail may have limited visibility from the cortile space below, the extended use of the handrail along the voids may have a high visual impact. The proposed section of the handrail includes a heavy base that may dominate the visual aesthetic of the sandstone coping.</p>	<p>These new balustrade elements have been designed by Woods Bagot to be minimal in appearance and respond to the overall design intent of the refurbishment works by utilising a dark bronze material finish. No intervention to significant fabric is proposed, with the new balustrade elements to be fixed to the sandstone coping utilising the existing fixing points for the existing balustrade elements. No further penetrations will occur.</p> <p>These elements are entirely reversible/replaceable and will allow the building to continue to operate as a hotel whilst also meeting code compliance. The proposed elements are beautifully restrained in their detailing and are readily apparent as new work. They</p>

Comment	Response
	<p>will not detract from the traditional character of the masonry arcades.</p> <p>This proposed change is minimal and will have no adverse or material impact on the significance of the place. The proposed balustrade is a reasonable approach for a minimal contemporary intervention. The sandstone coping and all original masonry elements will be retained and conserved and will remain visible. Urbis Heritage are confident that the proposed balustrades are acceptable from a heritage perspective and we do not recommend changes to the current design.</p> <p>For further information, refer to Section 6.4 of the submitted Heritage Impact Statement.</p>
<p>16. It is recommended that the works outlined in the Schedule of Conservation Works be prioritized and be completed as part of the development. The works should be undertaken under the guidance of a suitably qualified heritage consultant.</p>	<p>Noted.</p>
<p>17. The interpretation Strategy generally aligns with the Conservation Management Plan.</p>	<p>Noted.</p>
<p>18. Detailed design of the interpretation as outlined in the Heritage Interpretation Strategy should be undertake as part of the construction stage of the project, including preparation and sourcing of archival content, confirmation of interpretation devices designs, locations, materials and manufacturing. All interpretation works shall be guided by a suitably qualified heritage consultant. Any salvageable materials should be marked prior to demolition and stored securely either on-site or at an off-site storage location.</p>	<p>Noted.</p>

Comment	Response
<p>19. All conservation and interpretation works shall be undertaken prior to the issue of an occupation certificate.</p>	<p>Noted.</p>
Transport for NSW	
<p>20. It is requested that the applicant be conditioned to prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with the Sydney Coordination Office within TfNSW and submit a copy of the final CPTMP plan to the Coordinator General, Transport Coordination for endorsement, prior to the issue of any construction certificate or any preparatory, demolition or excavation works, whichever is the earlier.</p>	<p>Noted. The condition proposed by TfNSW is acceptable to the Applicant.</p>
<p>21. It is requested the applicant be conditioned to prepare a Green Travel Plan in consultation with the Sydney Coordination Office within TfNSW.</p> <p>The plan shall be approved by the Coordinator General, Transport Coordination, within Transport for NSW, at least 6 months prior to receiving the Occupation Certificate.</p> <p>The plan shall be reviewed and updated annually in consultation with the aforementioned stakeholders and provide an Implementation Strategy that commits to specific management actions, including operational procedures to be implemented along with timeframes.</p> <p>The plan (as reviewed and updated annually) shall be implemented by the applicant for the life of the development.</p>	<p>Noted. The condition proposed by TfNSW is acceptable to the Applicant.</p>
<p>22. A Transport Access Guide (TAG) must be implemented and maintained by the operators of the premises and be made available to staff, clients, customers and visitors at all times. The TAG should provide information to staff, guests</p>	<p>Noted. The condition proposed by TfNSW is acceptable to the Applicant.</p>

Comment	Response
<p>and visitors about how to travel to the site by sustainable transport modes. This should include information about public transport connectivity, end of trip facilities, and local pedestrian and cycling connections submitting a copy of the final plan to Transport for NSW for endorsement, prior to the issue of the occupation certificate.</p> <p>The Transport Access Guide is to include (but not be limited to) the following:</p> <ul style="list-style-type: none"> (i) Information regarding lack of off-street car parking and passenger pick-up and set-down areas at the development site (ii) Suitable nearby drop-off/pick-up locations (iii) Identify areas where drop-off/pick-up is prohibited and instruct visitors to avoid use of these areas (iv) Suitable nearby Taxi Zones 	
<p>23. Bicycle facilities should be located in secure, convenient, accessible areas close to the main entries incorporating adequate lighting and passive surveillance and in accordance with Austroads guidelines.</p>	<p>Noted.</p>
<p>EES</p>	
<p>24. Biodiversity</p> <p>A Biodiversity Development Assessment Report Waiver was approved 13 August 2020.</p> <p>25. Flooding</p> <p>EES makes no further flooding comments.</p>	<p>Noted.</p>
<p>EPA</p>	
<p>26. In its letter dated 7 May 2020 (ref DOC20/322538) the EPA stated that it has no</p>	<p>Noted.</p>

Comment	Response
<p>further interest in the proposal and no further consultation is required.</p> <p>Based on the information provided, the proposal does not require an Environment Protection Licence under the Protection of the Environment Operations Act 1997. The proposal is not being undertaken by or on behalf of a NSW public authority, and the EPA is not the appropriate regulatory authority for the proposal.</p> <p>The EPA has no further comments on the proposal or the EIS provided in relation to the proposal. No further consultation with the EPA is required in relation to the proposal.</p>	
Royal Botanic Gardens and Domain Trust	
<p>27. Potential overshadowing is the greatest and ongoing concern to the Trust with any development of this site as the loss of sunlight can have a significant impact on the health and appearance of the Garden, its botanical displays and individual specimens. We note in this regard that the proposed alterations and refurbishments would be contained within the solar access planes that were incorporated in the approved Concept Plan for Stage 1 of the proposal and the Draft SEARs require the proponent to demonstrate how solar access to key public open spaces and the surrounding public domain will be protected.</p> <p>No other potential issues for the Trust were apparent from the plans so we have no major comments and are happy for the EIS to proceed. Moreover, we look forward to reviewing the development application for Transport House once the Conservation Management Plan (CMP) is endorsed by the City of Sydney (May 2020) and the Heritage Council.</p>	<p>Noted.</p>



4. CONCLUSION

This RtS has considered the submissions received from NSW DPIE and government agencies during the exhibition of SSD-10454 Intercontinental Hotel – Stage 2. The proposal has been refined, where appropriate, to respond to comments raised by all stakeholders. The EIS and RtS confirm that there are no significant adverse environmental impacts and the proposal should be approved.

The proposal is considered suitable for the site and worthy of support by the Minister for the following reasons:

- The development facilities upgrade works to an internationally rated hotel, close to high profile tourist destinations and public transport in Sydney CBD. The works will provide an injection of some 35-40 construction jobs and 50 operational jobs, which will make a positive contribution to the NSW economy.
- The proposal satisfies the key strategic and statutory policies and guidelines, including the City of Sydney Council's strategic planning documents, which support the provision of visitor accommodation in the CBD. The project will contribute to the role of Sydney CBD as a global tourism destination with high-quality accommodation – attracting people, business and investment.
- The architectural design of the refurbishment works has been subject of detailed and ongoing collaboration/liaison between specialist consultants and NSW Government agencies. The proposal is considered to achieve design excellence, while respecting and preserving the significant heritage characteristics of the site.
- Considering the high level of compliance with the design parameters set out in the Concept approval, together with the scheme's consistency with the built form provisions contained within the relevant EPIs, the proposal is considered suitable for the site and its context.
- The location of the site provides significant access to existing and planned transport infrastructure, together with compatible services, facilities and uses. As such, the site is considered wholly suitable for the proposal.

The proposal will not create any adverse significant social, economic or amenity impacts which cannot be mitigated via the proposed mitigation measures outlined in the EIS. In summary, the proposal can be supported on environmental planning grounds and warrants the support of the Minister. We therefore recommend that approval be granted, subject to appropriate conditions.

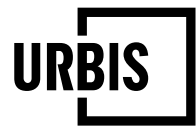
If you have any questions, please do not hesitate to contact me.

Yours sincerely,

Edward Green

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CC: Michael Watt (Planning Manager, Development – Mulpha)



Enclosed: Appendix A Outline Plan of Management for the Club Lounge prepared by Mulpha
 Appendix B Rooftop Services Drawing prepared by Woods Bagot
 Appendix C Revised Waste Management Plan prepared by Waste Audit
 Appendix D Revised Architectural Plans prepared by Woods Bagot
 Appendix E Revised Wind Report prepared by Windtech
 Appendix F Bicycle Parking Statement prepared by JMT Consulting