

8 December 2020

File No: R/2017/23/C & /2019/16/B
Our Ref: 2020/545943
Your Ref: SSD-8875 MOD 1 & SSD-10375

James Groundwater
Key Sites Assessment
Department of Planning, Industry and Environment

Uploaded to Major Projects portal

Dear James

Request for advice – SSD 8875 MOD 1 Envelope Amendments and GFA Increase & SSD 10375 (Pitt St North) Stage 2 Development Application – Advice on RTS

Thank you for your correspondence dated 20 November 2020 seeking the City of Sydney's (the City) comments on the Response to Submissions (RtS) for the proposed amendments to the concept approval and the above detailed design for the Pitt Street North OSD at 175-183 Castlereagh St, Sydney.

The City's previous correspondence dated 12 August 2020, noted no objections raised to the proposed amendments to the concept application (SSD 8875 MOD 1) and no additional comments are provided. Further, as discussed in the City's previous comments, the detailed design proposal is generally supported, however, a number of issues still stand regarding public domain works and transport and access. The City have reviewed the submitted RtS and provide comments as follows.

1 Public Domain

The submitted RtS has failed to adequately respond to the City's issues raised in previous correspondence regarding stormwater and flood impacts. Please see the matters discussed in further detail below.

1.1 Stormwater Quality Assessment

The submitted RtS notes that a MUSIC Model was already submitted as part of previous considerations, however, as requested previously, the City requires a MUSIC Link report to be submitted for review and approval.

The City has adopted MUSIC-link for assessing Water Sensitive Urban Design (WSUD) compliance for developments. A stormwater quality assessment for the proposed development must comply with the City's specific modelling parameters as adopted in MUSIC-link. A certificate and/or report from MUSIC-link and the electronic copy of the MUSIC Model must be submitted for review and approval with the stormwater quality assessment report. For more information, please refer to <https://ewater.org.au/products/music/music-link/>

1.2 Flood Planning Levels and Flood Impact Assessment

As the City has advised and requested previously, the 1% AEP flood planning levels must be determined in AHD (Australian Height Datum) and must be shown on all relevant drawings/plans.

The submitted flood impact assessment report prepared by Aurecon accompanying the application has only summarised the flood planning level requirements without determining the actual 1% AEP flood levels in AHD. Accordingly, the City are unable to accept or approve any floor levels and subsequently the proposed footpath level assessment cannot be carried out.

2 Vehicle access and queuing arrangements

Overall there is still some concern regarding the access arrangements. The current proposed access arrangements require vehicles waiting for the lifts (and entering and exiting the lift) to use the shared space and impact on access to the loading areas. Access to the site for loading and servicing should be prioritised. A queuing assessment is also recommended to use the Australian Standard 98th percentile for access to mechanical parking installations. This site is in a busy city centre location, on a road with bus priority lanes and high use from people walking, people cycling, public transport and vehicles.

Further, any safety measures that impact negatively on the public domain are not supported. Pedestrians using the footpath must have priority over vehicles entering and exiting the site and the site should be designed safely and so that this priority is maintained and clear. Castlereagh Street footpath is busy and will become busier with the opening of the station.

3 Loading and servicing

Loading and servicing rates should be provided as per the Sydney DCP 2012. The development is a new development and loading and servicing needs should be accommodated on site. The access arrangements, including proposed management arrangements, and parking provision should prioritise loading and servicing. As per previous comments, the rates specified in the Sydney DCP 2012 allow for a mix of courier and other bays.

The City notes the applicant's responses regarding courier access to the car stacker and the use of the northern and southern sections of the loading dock.

4 Car parking

The City notes and accepts the applicant's response regarding car parking within the site.

5 Bike parking

The City notes the proposed 200 bicycle parking spaces provided within the site. There is, however, still the potential for a shortfall in bicycle parking. Bike parking and end of trip facilities are to be provided as per the Sydney DCP 2012 recommendations and the good design of end of trip facilities should not be underestimated.

Further, the conversion of the car stacker to bike parking is still queried.

6 Environmentally Sustainable Design (ESD)

The RtS includes a response from Cundall Johnston and Partners regarding ESD issues raised by the City in previous correspondence. The response notes the development is committed to achieving a NABERS 5.5 Star Base Building Energy rating for the commercial office spaces. It is recommended that a condition of consent be issued that required the applicant to enter into a formal Commitment Agreement with the Office of Environment and Heritage (OEH). A copy of the completed Commitment

Agreement and a copy of an independent energy assessment in accordance with current OEH guidelines must be submitted with any Construction Certificate application.

Further, the RtS notes the tower is to include PV panels on the roof to address on-site renewables. No further issue is raised.

7 Waste Management

The City notes the submission of a draft construction waste management plan. It is recommended that a final version be approved prior to the issue of any Construction Certificate.

8 Urban Ecology

The City notes the applicant's response to issues regarding increasing instances of bird strikes to buildings within the city centre. The submitted RtS provides a response that outlines the design measures within the development that reduce the risk of bird strikes including the use of solid spandrels, vertical fins, glazing of low reflectivity, translucent glazing treatments on some floors within the building and careful landscape planning. The City is satisfied with the applicant's response to this issue.

Please note the City maintains our recommended Conditions of Consent as per previous correspondence dated 17 August 2020.

Should you wish to speak with a Council officer about the above, please contact Marie Burge, Planner, on 9265 9333 or at mburge@cityofsydney.nsw.gov.au.

Yours sincerely,



Andrew Rees
Area Planning Manager