

13 March 2023

Our Ref: R/2022/8/A
File No: 2023/119323
Your Ref: SSI 45421960

Sam Kelly
Planning Officer – Transport Assessments
Department of Planning and Environment

Via Major Projects Portal

Dear Sam

Sydney Terminal Building Revitalisation – SSI 45421960 – Advice on EIS

Thank you for your correspondence dated 8 February 2023 inviting the City of Sydney Council (the City) to comment on the proposed State Significant Infrastructure (SSI) application for upgrade works to the Sydney Terminal Building proposed by Transport for NSW (TfNSW). The works are nominated as SSI works as per Section 8 of Schedule 4 of the State Significant Planning Policy (Planning Systems) 2021.

The proposal seeks consent for the restoration and revitalisation of the Sydney Terminal Building at Central Station. The project forms part of the broader Central Precinct Renewal Program and is largely concentrated around the Eddy Avenue frontage of the site, the Central Electric Building, the Western Forecourt, and the western loading dock.

The proposal includes the following works:

- Revitalisation and upgrade of the Sydney Terminal building, Eddy Avenue Colonnade, Eddy Avenue Plaza, and Western Forecourt to improve customer amenity, access and wayfinding
- Reconfiguration and market style retail activation within the western loading dock
- Refurbishment of the Central Electric Building to be repurposed for additional retail space
- Adaptive reuse and improved activation of spaces, including high quality retail, and commercial, cultural, entertainment and community uses, complimentary to the transport interchange's function
- Utility relocation and replacement

The City has reviewed the submitted Environmental Impact Statement (EIS) and supporting documentation and do not raise an objection to the proposal. The City is supportive of the revitalisation of the building and its future contribution to active commercial uses, particularly its potential to contribute to the night time economy.

The proposal would benefit from a more considered approach to the station's role as a place for social and cultural gathering and day-into-night activation that keeps the area active, lively, and safe after dark.

The proposed retail activation of the Eddy Avenue retail spaces is supported but thought must be given to how these spaces will be curated to support nightlife activity. Small bars, restaurants, galleries, or performance spaces will ensure Eddy Avenue has a steady flow of activity and patrons after dark and there is great opportunity for the site to become an entertainment destination, as well as a transport hub.

Whilst the provision of a “multi-purpose space” within the former electrical department is supportable, no detail has been provided on how this will operate and what the multiple purposes would be. The City recommends that this space be a dedicated cultural venue with both day and night time operations, and that a suitable cultural operator or creative business be engaged early in the design process to be involved in the development of a purpose-built cultural facility. A space for exhibitions, events and performances would be well suited to this location and will provide significant value-add to the commercial hospitality and retail tenancies of Eddy Avenue, and diversify the night time offering

The City also encourages TfNSW to include the provision of a barrier-free ‘changing places’ toilet facilities in key transport hubs and interchanges, including at Central Station and other major interchanges in the Sydney CBD.

Changing Places toilets are specialised accessible toilets that include an adult change table and larger circulation space. They are designed to meet the needs of people with profound disabilities and their carers, who currently are often forced on the floor of accessible toilets for changing and cleaning purposes. See specifications and further information at: www.changingplaces.org.au.

Provision of additional changing places facilities in Sydney CBD in the Central, Town Hall and Circular Quay precincts is a high priority. Such facilities would make it possible for people from all over greater Sydney and beyond to visit Sydney and participate in the social and cultural life of our city. The provision of a changing places facility at Central Station would ensure almost everyone using public transport could access an appropriate facility as they enter the City or attend major outdoor public events like Vivid Sydney and Sydney NYE.

Renewal of key public transport interchanges represent a unique opportunity for the NSW government to demonstrate leadership in NSW through the provision of a network of strategically located ‘changing places’ facilities across NSW at key transport hubs and interchanges.

The City has delivered additional changing places toilets in our local government area, including in Millers Point and the Gunyama park in Zetland, and encourages the NSW Government to ensure these important facilities are provided, and would welcome the opportunity to discuss with TfNSW any future opportunities in our area and ensure an integrated approach to planning the delivery of these facilities.

The following additional comments are provided for your consideration.

1 Heritage

The proposal seeks consent for significant works to the State significant building listed as *Sydney Terminal and Central Railway Stations Group* under the Heritage Act 1977 (Item No 01255) and as *Central Railway Station group including buildings, station yard, viaducts and building interiors* under the Sydney Local Environmental Plan 2012 (Item No 1824). The basic drawings submitted with the application indicate demolition works are to be undertaken to facilitate the development however, the extent of demolition is unknown as demolition plans have not been submitted for consideration. It is difficult to

assess the potential heritage impacts of the proposal without these plans. From a desktop analysis, it appears that sandstone elements of the building such as pillars, windows and arches are being demolished.

The City is limited in providing detailed comments on the impacts of demolition on heritage fabric which raises concern and should be addressed.

Further, the documentation has not been accompanied by drawings of an acceptable scale showing new elements such as stairs and ramps that allows the City to assess the alterations to heritage fabric and any potential impacts. Whilst it is understood that SSI applications are not required to submit detailed drawings for approval, the proposed development involves significant alteration to a heritage item and documentation of more specific detail should be provided for consideration, subject to further development post-consent.

Notwithstanding, the removal of detracting additions and the restoration of the former booking hall and other elements within the Grand Concourse are commended.

In addition to the above, the following comments are provided in regard to heritage.

1.1 Western escalator to the Grand Concourse

A new escalator is planned to fit in a tight area beneath an existing sandstone archway. The City raises concern that part of the archway or side columns may require partial demolition to allow the escalator to fit. This needs to be clearly detailed to clarify that no original sandstone will be removed.

1.2 Pedestrian connection to Eddy Plaza

The proposal includes a pedestrian connection at ground level to Eddy Plaza travelling through existing small archways however, the submitted documentation does not indicate whether the current openings are adequate or if demolition of original fabric (like sandstone pillars, arches and windows) will be required. This is of high concern and should be clarified.

1.3 New building in Eddy Plaza

The application proposes a new two storey building to the western side of Eddy Plaza. The application has not been accompanied by a visual impact analysis and should be undertaken to understand the impact on the passengers' experience while approaching/departing the station.

The current visual appreciated of the western side of Central Station should be preserved and not replaced by a blank brick/concrete wall. The eastern wall of this new structure would require further articulation if the building is to be considered in its current configuration.

1.4 North-eastern pedestrian connection

Similar to consent raised in Section 1.2 above, the level of demolition to allow a new pedestrian connection to Eddy Avenue at the north-eastern corner of the site is unknown and should be clarified.

2 Built form and urban design

In addition to concerns raised regarding heritage impacts as discussed in Section 1 above, the following matters are raised regarding general design issues.

2.1 *Connecting to Country*

The connecting to country framework includes two relevant principles: a connection to Sky Country and connecting to Country to layers of Sandstone. While the connection to Sky Country is specific to the design of the Grand Concourse, the City believes there is a missed opportunity to maintain the connection to Sky Country looking to the building facing west from Foveaux Street.

The proposal seeks to increase the height of the shops along the eastern edge of the Eddy Avenue Plaza to the above the viaduct blocking views of the sandstone facade of the Grand Concourse building and sky. It is likely that the spaces above the height of the viaduct will be subject to the close noise and movement of the trains along the viaduct.

It is recommended that the new building be reconsidered to explore the retention of views west along Foveaux Street to the main concourse building.

2.2 *Eddy Avenue colonnade*

There is an existing colonnade that wraps around the Central Station interface from Pitt Street, along Eddy Avenue and around the eastern side of Eddy Plaza. This provides continuous weather protection for pedestrians.

The proposal infills the colonnade at the eastern edge of Eddy Plaza, disrupting the continuous weather protection from Pitt Street to the Central Electric Building and should be reconsidered.

While the redesign of Eddy Plaza rationalises the space and grades by removing the ramp along the viaducts, is it likely to be neutral in the amount of space provided for pedestrians due to the infill of the colonnade. Additionally, the infill removes the brick columns and masonry expression which may contribute to the reduction of space in an existing open urban room of Eddy Plaza.

Further, footpath widening along Eddy Avenue between the existing kerb and light rail corridor is strongly supported. It appears that this initiative is only a consideration however, the City strongly recommend that the colonnade footpath surface be upgraded to match the City's city centre palette/ specifications and continue out to the edge of the light rail corridor.

2.3 *Grand Concourse awning extension*

The proposal seeks to continue the existing awning to the eastern terrace for outdoor seating.

The City is concerned that the awning extension will further impact on views to the sandstone facade of the Grand Concourse from Eddy Plaza as does the existing awning at the southern end of the terrace.

Further, the proposed awning disrupts the view through the porte cochere upon arrival at the top of the escalators looking east, currently providing a vista to Surry Hills along Foveaux Street.

The City recommends that the awning extension be reconsidered and alternatives for weather protection that maintain views to the sandstone facade be explored, such as umbrellas. Further, it is recommended that the vista to Surry Hills from the porte cochere be maintained and unobstructed by any structure including awnings or umbrellas.

2.4 North-west entrance corner and existing vertical transport

A new vertical transport core is being provided in the northwest corner adjacent to the clock tower. Consideration should be given to removing the existing lift that currently pops up in the public domain at the terminal building's northwest corner porte cochere level. The existing lift core has a significant detrimental impact to the heritage fabric of the terminal building and its curtilage. It is noted that the vertical core has recently been refurbished and therefore its removal has not been considered, however the City strongly recommend removal of the existing vertical transport core or at least removal of the lift, considering that a new lift is being provided close to the existing location and better integrated into the heritage fabric.

2.5 Reconfigured porte cochere

The reconfigured light rail alignment to the porte cochere to improve public space, passenger flow and activation opportunities is strongly supported.

2.6 Information kiosk

The proposed information kiosk/concierge located within the Grand Concourse is very close to the western entry where people are likely to gather and wait. Placement of elements within the grand concourse need to be tested and considered further to ensure the concourse does not become overly cluttered, obstructing the movement of commuters and visitors.

2.7 Marketplace in former loading dock and east-west lower concourse connections

The marketplace, internal concourse connections and retail spaces need to be carefully considered to avoid dead ends, but at the same time, not duplicate the function of Eddy Avenue colonnade as the key east-west pedestrian.

2.8 New vertical transport core

A new vertical transport core (lift and stairs) in the north-east corner adjacent to the clocktower appears (in section) to access the roof however, roof plan/details have not been provided. The potential visual and heritage impact of the proposed roof structure/envelope is significant and should be clarified.

3 Transport and Access

Whilst the removal of loading spaces within the site to create new activation spaces for retail are supported, concern is raised regarding the remaining loading functions of the site. The following comments are provided in regard to transport and access.

3.1 Loading

The on-site loading capacity will be reduced to 4xB99 bays and 2x SRV/MRV bays. The submitted transport study notes that this design only accommodates approximately 50% of the peak hour demand under business-as-usual conditions. While this shortfall can be partially offset by relocating some of the loading demand to Sydney Yard and using a

loading dock management system, there is still a major risk that underproviding off-street loading spaces will create congestion issues on adjacent streets and put more stress on nearby on-street loading. Given how constrained the network is around Central, loading overflow would have significant negative impact and should be further explored.

A possible solution is to expand the footprint of the loading dock in a way that could be converted to additional retail space once the centralised loading dock is delivered as part of the over station development.

3.2 Cycle facilities

Whilst an additional 50 bicycle parking spaces are supported, these should be delivered within the site boundary and not within the already constrained public domain.

The exhibited Central Precinct Rezoning Proposal Transport Study shows a proposed bike hub within the terminal building. This is an important location for end of trip facilities for people cycling to Central since this is the primary access point to intercity and regional trains. An end-to-end trip hub should also be incorporated into this project.

3.4 Eddy Avenue

As noted in Section 2.2 above, widened footpaths along Eddy Avenue are strongly supported by the City.

The applicant should note that the City is investigating options for improving the cycle connection along Elizabeth Street to connect in to the Castlereagh Street cycleway. This could have impacts on the design of the pedestrian/cyclist interactions around the Eddy Avenue crossing. TfNSW should continue to engage with the City on this issue as design progresses.

Pedestrian modelling undertaken for the Central Precinct Rezoning Proposal has flagged a significant pedestrian crowding and safety issue at the south-western corner of the Pitt Street/Eddy Avenue intersection. The Terminal Building Revitalisation project needs to provide sufficient space to resolve this issue to avoid having to redesign this corner again.

4 Public Domain

The proposal seeks consent for improvements to wayfinding and accessibility to Central Station with new entrances from Eddy Avenue and the corner of Pitt Street. The Eddy Plaza public domain is to be upgraded and regraded with the removal of the existing retaining wall. As the site is flood affected, additional information as noted below is required in addition to comments for your consideration.

4.1 Public domain improvements

The proposal impacts the public domain along Eddy Avenue where the existing public domain adjacent to the eastern plaza is finished in granite and is in reasonable condition. This area is to be retained and protected during construction. To ensure that the proposed changes to levels within the plaza do not impact the public domain along Eddy Avenue, alignment levels are to be submitted to the City for review and approval.

The remaining public domain frontage on Eddy Avenue (Colonnade) and Pitt Street where works are proposed is finished in asphalt and is in poor condition. Due to the

adaptive reuse of the lower concourse areas, new retail and the expected increase of pedestrian footfall, the works to the site are to include addressing the public domain along the Eddy Avenue and Pitt Street frontages and upgrading the finish to the City's standards. It is recommended that a public domain plan condition is included in the consent with consultation with the City during the design development phase.

4.2 Flooding

Groundwater conditions have been considered in the proposal however, groundwater may only be evident during construction works and not part of normal operations. Eddy Plaza is the only area of the project with potential to impact flood conveyance.

The submitted flood report advises flooding of up to 100mm flood depth in the 1% AEP is possible in Eddy Avenue and is confined mainly to the kerb and gutter extents. Given the site is noted as flood affected in Council records, the flood assessment report should advise recommended flood planning levels for all new works in accordance with the City's Interim Floodplain Management Policy including:

- the new Plaza East building
- the east-west concourse entry
- the new Metro egress
- entry to basement retail
- the Central Electric building entry
- new retail areas
- Proposed new entries off Eddy Avenue

It should also provide recommendations regarding protection of existing retail floor levels off the plaza and Eddy Avenue.

4.3 Public domain lighting

No information or details for public domain lighting upgrades of the plaza have been provided. The proposal is to address public domain lighting leading to the site and within the new plaza areas.

5 Tree Management and Landscaping

The proposal seeks to incorporate significant new landscaping in and around the precinct and is supportable, subject to additional information and amendments. The following comments are provided for your consideration.

5.1 Existing tree impacts

An arboricultural impact assessment has not been provided with the EIS and the City is limited in providing comments on the potential impacts on existing trees.

Notwithstanding, the City is supportive of the retention of the existing street trees however, an arboricultural impact assessment and tree protection plan will be required to ensure that the footpath widening, repaving and general construction works will not impact the existing trees.

The City is also supportive of the removal of up to 8 trees in Eddy Plaza to facilitate improved accessibility, legibility and quality of the upgraded plaza in addition to providing opportunity for increased quality and quantity of canopy.

5.2 Canopy cover and species selection

The current proposed design provides a potential of 29% canopy cover (including the existing plan tree on Eddy Avenue). The canopy cover proposed is less than the City's adopted target for Civic Spaces – 50% Canopy Cover, 55% green cover and it is recommended that the proposal incorporates a change in tree species to ensure that the plaza achieves appropriate level of canopy as per the Greening Sydney Strategy targets and in line with the NSW Government's own priority to increase canopy and green cover.

It is recommended that the palms on the north-western side of plaza are replaced with large deciduous canopy trees (or a mixture of large deciduous canopy trees and large evergreen native trees) which will provide improved canopy cover. Spacing can be achieved which allows for the high pedestrian movement to be maintained as well as the maintaining clear sight lines for pedestrian users of the plaza. Large Trees (More than 12 metre canopy diameter at maturity) require a minimum soil volume of 150 cubic metres, minimum soil depth of 1.5 metres and minimum soil area 10 metres x 10 metres.

Further, it is recommended that sufficient volume of soil is provided to support proposed large trees and reference should be made to the requirements in the City of Sydney technical specifications for tree planting.

Additionally, the City is supportive of the specification of *Waterhousea floribunda* as a canopy tree. The variety is to be nominated and must be a variety that provides a minimum 12m canopy width.

Appropriate storage and supply of water is also recommended to be provided for the establishment and ongoing maintenance of the landscaping and that is integrated into the design of the building/plaza, as referenced in the Climate Change Adaptation Plan.

5.3 Green Roof to new retail building

A new green roof is proposed on new building on the east of the plaza. This area is recommended to be maximised to contribute to green cover target. There is, however, absent clarity for the green roof design.

It is requested that additional information is prepared that demonstrates the green roof design, including plan with details for roof profile, species to increase biodiversity of the site, confirmation if rainwater harvesting proposed for irrigation reuse and how the green roof feature will be accessed and maintained.

5.4 Grand Concourse planters

A low planter with seating walls planted with tree ferns is proposed to the eastern edge of the grand concourse to separate commuter foot traffic from a dining area. This gesture helps green and provide respite to a busy concourse. However, the planter design must be robust in a highly trafficked interior environment, and planting design able to withstand the limited light levels.

There is absent clarity for the planter design, soil depth, soil volume, integrated drainage and irrigation design to support the proposed planting.

Further consideration must be given to this design feature to ensure seating to planter walls include back rests, arm rests for comfort of all ages and equitable. Further, any

seating to planter edges is to be designed such that people cannot lean back into the garden bed damaging the plants.

It is requested that additional information is submitted that includes plan drawings, sections and details to demonstrate the design and to resolve these issues.

6 Site contamination

A Preliminary Site Assessment has been submitted as part of the Environmental Impact Statement for the revitalisation of the Sydney Central Terminal Building. The report titled Sydney Terminal Building Revitalisation Soil and Contamination Assessment, dated February 2023, prepared by TfNSW, has been reviewed by the City.

The assessment generally follows the principles of NSW EPA Guideline for Consultants Reporting on Contaminated Sites (2020) however, it is noted that a site walkover and inspection was not undertaken as part of the assessment.

The assessment included data from previous site investigations undertaken as part of the Sydney Metro project which targeted three areas of anticipated works located within the railway corridor directly south/southwest of the Sydney Terminal Building and the site. These investigations identified exceedances of PAH's, presence of asbestos in soils. Based on these investigations and the desktop assessment carried out by TfNSW a number of Contaminants of Potential Concern (CoPC) have been identified. As the extent and location of the CoPC are not known, further investigation and analysis across the anticipated areas of excavation is required in order to evaluate risks to human health and the environment.

The proposal is currently unsatisfactory to the City from a public health stance until the following information is provided for further comment and found to be satisfactory:

A Detailed Environmental Site Investigation (DESI) is to be carried out by a suitably qualified and competent environmental consultant and submitted to the City for further review in accordance with the NSW Government Office of Environment and Heritage, Guidelines for Consultants Reporting on Contaminated Sites, Contaminated Land Management Act 1997 and SEPP (Resilience and Hazards) Remediation of Land confirming that the site is suitable (or will be suitable, after remediation) for the proposed use.

Where the DESI states that the site requires remediation, a Remediation Action Plan (RAP) is to be prepared by a suitably qualified and competent environmental consultant in accordance with the NSW Government Office of Environment and Heritage, Guidelines for Consultants Reporting on Contaminated Sites and the Contaminated Land Management Act 1997 and submitted to the City.

7 Waste Management

The proposed development seeks to service a large area of retail uses in addition to general station functions and it is vital that the waste storage areas are large enough for the waste that will be generated and are able to be serviced for within loading docks able to provide access to large vehicles. At this stage, no information has been provided to address waste management and the City is unable to provide detailed, constructive comments. As such, general comments are provided for your consideration.

7.1 Key issues

The proposal is to include a framework for how the proposed development will reflect national best practice sustainable building principles to improve environmental performance, including energy and water efficient design and technology, use of renewable energy and best practice in waste management including reduction design measures including any opportunity for food scraps/composting strategies.

The proposal must also demonstrate sufficient waste and recycling management facilities storage and holding areas for servicing are provided given the large volume of waste likely to be generated within the site.

7.2 Servicing and waste

The proposal must provide the following information:

- Identify, quantify and classify the likely waste streams to be generated during operation and describe the measures to be implemented to manage, reuse, recycle and safely dispose of this waste.
- Utilise the City of Sydney Guidelines For Waste Management In New Development 2018 as a primary source and the NSW EPA Better Practice Guide For Resource Recovery In New Developments 2019 as a secondary source for waste generation rates and demonstrate how the principles of Circular Economy will be incorporated in the design, construction and operation of the development
- Identify appropriate servicing arrangements (including but not limited to, waste management, loading zones, mechanical plant) for the site.
- Identify the path of access for users and collection vehicles.
- As part of Sustainable Sydney 2030, the City is limiting truck movements to ease road congestion. Truck movements such as waste collections should ideally be no more than three times a week.
- Provide details the ongoing management, storage and collection of waste, including responsibility for cleaning, transfer of bins between storage areas and collection points, implementation and maintenance of signage, and security of storage areas.
- Address the City of Sydney Guidelines For Waste Management In New Developments 2018 setting out the required clearances for collection vehicle access to buildings, and the options for secure internal waste and recycling storage rooms. These requirements will allow standard waste and recycling collection to proceed onsite without obstruction or loss of amenity, improving the quality of the city's public spaces.
- Identify space in the commercial development dedicated for storing bulky waste and problem waste for recycling of at least: 4m² for developments between 100m² and 2,000m². An additional 4m² is required for each retail or entertainment space over 2,000 m² and for every 20,000m² of office space.
- Details of the management of waste from construction and demolition activities to be minimised by avoidance and reduction practices, reuse on-site and the recycling of materials.
- Waste management plans for demolition and construction including material storage areas for reusable materials and recyclables during demolition and construction; vehicle access to material storage areas; estimation of quantities and types of materials to be reused, recycled, or left over for removal from the site are required. A template is available at appendix A and B of the City of Sydney Guidelines For Waste Management In New Developments 2018

To further facilitate circular economy opportunities, it is recommended that the development provides for the reuse and repair of existing fabric where possible, leasing and sharing of facilities, provision of collection points for producer responsibility schemes and the provision for storing and reverse logistics facilities.

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

Yours sincerely,

A handwritten signature in black ink, appearing to read 'GJahn', with a large loop at the end.

Graham Jahn AM LFRAIA Hon FPIA
Director
City Planning | Development | Transport