

2 April 2025

Our Ref: 2025/205939
File No: R/2025/7

Patrick Nash
Senior Planner
Department of Planning, Housing and Infrastructure

via Major Projects Planning Portal

Dear Patrick,

SSD-79316759 – 45-53 Macleay Street – Environmental Impact Assessment

Thank you for your correspondence dated 7 March 2025 inviting the City of Sydney (the City) to comment on the above referenced State Significant Development application.

The application seeks consent for an educational establishment, part of the existing University of Sydney Camperdown campus, comprising a five-storey building with nine formal teaching spaces, informal learning spaces and an ancillary food and beverage offering, and internal public domain and landscaping improvements.

The City has reviewed the submitted documentation and provides the following comments for your consideration:

Heritage

The existing sandstone gate pillars and wrought iron gates of the Ross Street Gates are proposed to be relocated approximately 7m to the north of their current position on Western Avenue. The Ross Street Gates are heritage listed under SLEP 2012 and are identified as being a 'significant sandstone pillar entry and gateway associated with the landscape setting' in the University of Sydney Ground Conservation Management Plan. Relocation was identified as part of the Campus Improvement Plan SSD-6123 and is shown on the stamped approved concept plans.

The gates have previously been reconfigured since their construction in c1910 and their relocation is supported by the City in principle. The pillars and gates should be conserved as part of the relocation works.

Additionally, 40m of the palisade fence with its sandstone block base is proposed to be removed and stored to provide a more permeable access to the building and campus. The palisade fencing, which encircles the Camperdown campus, is heritage listed under SLEP 2012 and is identified as 'Site landscaping, University of Sydney Perimeter Fencing and Gates'. It is also located within the SHR listed University of Sydney Conservation Area.

The extent of removal of the heritage listed palisade fencing will have an adverse impact on the heritage significance of the item and is not supported, noting:

The City of Sydney acknowledges
the Gadigal of the Eora Nation as the
Traditional Custodians of our local area.

- The university is a heritage cultural landscape containing buildings of exceptional individual value set within a designed landscape with large areas enclosed by a historic fence.
- The approved Campus Improvement Plan did not include removal of the fence (whereas the gate pillars were shown to be relocated) – refer to drawings SSD-F011 and F012.
- The proposed mitigation for the loss of the fence by interpreting the alignment of the fence to Parramatta Road, with flush sandstone inlay evoking the sandstone base, and to salvage the sandstone base and ironwork for maintenance and repair of the remainder of the fence, does not adequately mitigate the adverse impact on the significance of the fencing caused by the proposed removal.

It is recommended that only sections of the fencing be removed to create new openings tying in with the new internal paths, rather than removing the whole section of fencing fronting the teaching and learning hub. The removed sections may then be incorporated within the landscape design (refer to additional urban design and landscaping comments below).

Urban Design

Consistent with the position outlined above, the removal of the heritage listed palisade fencing along Parramatta Road is not supported from an urban design perspective.

The proposed development includes a landscaped setback along the Parramatta Road frontage to create a more permeable entry, however, the proposed northern elevation of the building presents as a blank frontage at the ground plane. The removal of the fencing and creation of multiple pathway entries interspersed between landscaping does not improve the access to the proposed building. In doing so the heritage edge and its significance is lost.

The Design Excellence and Review Committee also raised concerns regarding the removal of the fencing as measures would then be required to prevent people running across Parramatta Road. The removal of the fencing also requires the introduction of hostile vehicle defence measures further detracting from the design intent.

The submitted wind report indicates a number of locations failing the relevant comfort and safety criteria. In particular, P10-14 located in front of the main entry, which includes seating areas fails the safety criteria, being likely to experience strong wind gusts. At the north-western corner of the building points P1, 2 and 24 are close to or exceed the safety criteria but no mitigation measures have been detailed.

The wind report outlines that wind mitigation will be dealt with through further design development. This detail should be provided as part of the application to confirm the implications for the design of the building and public domain.

It is noted that the ground level diagram used in the wind report is outdated and entries to the building differ significantly from the submitted architectural plans. This should be updated.

Landscaping and Tree Canopy

The proposed tree removal and replacement canopy tree plantings is generally supported. The recommendations of the submitted AIA must be adhered to. In particular, sensitive construction methodologies are required to be undertaken to ensure the

retention of trees 765 and 782 *Lophostemon confertus* (Brush Box) when undertaking the footpath works and relocation of the existing palisade fencing and gate pillars.

The proposed replacement canopy tree plantings are listed within the City's recommended Tree Species List except for *Acacia implexa* (Hickory Wattle). It is recommended the site arborist review this species to confirm its tolerance (under changing climate) for the planting sites they are nominated.

Deep soil should be shown on the plans to ensure the proposed tree planting locations have adequate soil volumes to support these trees for the long term.

Public Design

Stormwater quality

A MUSIC link report is required to be submitted accompanying a stormwater quality assessment report prior to determination of the application. The City of Sydney (City) has adopted a MUSIClink 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 MUSIClink.

The proposed WSUD shall align with the latest submitted architectural, stormwater and landscape design and shall be supported by a schematic representation of a treatment train and the relevant catchment areas used for design.

Footpath

It is recommended that a continuous footpath treatment (CFT) be provided along the Parramatta Road frontage. The proponent should seek support and approval from TfNSW for a CFT with traffic lights to the Parramatta Road at the site. The City would only be able to support the proposed deletion of the refuge island if a CFT can be included in the scope of works. If a CFT will not be supported by TfNSW then the traffic design must include a refuge island extension for pedestrian when crossing Western Avenue along the Parramatta Road footpath. The lantern controlled pedestrian crossing must comply with accessibility requirements.

Notwithstanding the issues raised above (refer to heritage heading), the proposed removal of the palisade fencing along the boundary would damage the existing footpath along Parramatta Road. The proponent must be required to resurface the footpath to City standards and requirements as part of the public domain works. Existing levels, particularly around the bus stop require improvements to achieve compliant grades.

Levels and Gradients

Public domain levels and gradients of the new interface with Parramatta Road are to be submitted for review. Sections through the centre line of each proposed connection with the public domain/footpath along the Parramatta Road frontage are required.

The sections must include the existing and proposed boundary levels, top of the kerb and invert of gutter levels and be extended for a minimum of 2.0 m internally or up to the required FPL (flood planning level). If a continuous footpath treatment (CFT) at the entry to Western Avenue is accepted by TfNSW, a long section through CFT is required and shall be taken from the proposed path (fronting the new building) to the footpath across Western Avenue.

Flooding

It is noted that the site is subject to flooding. The proposed flood planning levels have been reviewed and are supported. The submitted Flood Impact and Risk Assessment prepared by GRC Hydro is required to be complied with and must be referenced in the conditions of consent should consent be granted.

Access and Transport

It is acknowledged that the university takes a campus wide approach to providing bicycle parking and end-of-trip facilities for staff and students. The proposed teaching and learning spaces, with ancillary food and beverage offering, does not provide dedicated bicycle parking and end-of-trip facilities within the building. Further analysis should be provided to demonstrate that sufficient bicycle parking and end-of-trip facilities are provided on campus, and within accessible locations to the teaching and learning hub. Access to bicycle parking and end-of-trip facilities should be simplified to encourage usership.

Improvements to pedestrian and cyclist access through the site are supported. The introduction of a bicycle lane and bicycle box on Western Avenue approaching the intersection of Parramatta Road are supported notwithstanding these works are proposed to be subject to a separate Part 5 approval process.

Cleansing and Waste

The proposed waste storage room is undersized for the amount of waste calculated to be generated by the teaching and learning hub and would not allow for sufficient manoeuvrability. The waste storage room should be redesigned to provide sufficient space.

Contributions

The proposed development is subject to the City of Sydney Development Contributions Plan 2015. The plan has been approved by the NSW Government and does not exempt crown development from the requirement to pay contributions. The City notes that the contributions payable may be reduced in accordance with Planning Circular 6 whereby the contributions for drainage and local roads remain relevant.

Should you wish to speak with a Council officer about the above, please contact Michael Stephens, Senior Planner, on 9265 9040 or at mstephens@cityofsydney.nsw.gov.au

Yours sincerely,



Graham Jahn AM LFRAIA Hon FPIA
Chief Planner / Executive Director
 City Planning | Development | Transport