



2 November 2018
Our Ref: 288

Ms Carolyn McNally
Secretary Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Attention Cameron Sargent

**Re: Proposed Additions to Longitude Building 36 James Craig Road, Rozelle
Request for Secretary's Environmental Assessment Requirements (SEARs)**

This letter is prepared on behalf of Ozton Pty Limited ABN 56 003 435 130 (Ozton). In accordance clause 3 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) and clause 8 and Schedule 2 (clause 2(a)) of *State Environmental Planning Policy (State and Regional Development 2011)* (SRD SEPP), Ozton requests the issue of Secretary's Environmental Assessment Requirements (SEARs) for the proposed additions and alteration to the existing building known as Longitude at 36 James Craig Road Rozelle.

The proposal qualifies for State Significant Development (SSD) for the purposes of section 4.36 of the *Environmental Planning & Assessment Act 1979* (EP & A Act) as the Capital Investment Value (CIV) of the project is estimated at approximately \$19,360,000 plus GST and in excess of the threshold for SSD of \$10 million as required by Schedule 2 clause 2 of the SRD SEPP relating to the Bays Precinct.

1.0 Background

Ozton is the lessee of the land known as 36 James Craig Road Rozelle. On 22 December 2006 approval was given by the Minister for Planning to Part 3A major project application 05_0187 for the proposal then known as Sydney Slipways Marine Repair Facility. That application included:

- the marine repair facility (now known as Sydney City Marine) which is located on the water's edge at Lot 31 DP1151746 adjacent to the western abutment of the old Glebe Island Bridge, and
- the commercial office space building now known as Longitude (the Site at Lot 34 DP1151746) which is separated from Sydney City Marine by James Craig Road.

Sydney City Marine and Longitude are leased to two unconnected parties by the landholder – the NSW Roads and Maritime Services (RMS).

2.0 The Site

The proposal is at 36 James Craig Road Rozelle, (Lot 34 DP1151746). The Site is bounded by James Craig Road to the south east, and Sommerville Road to the north west. It is a generally oval shaped site of approximately 739.4m², and is adjacent to the western end of the Anzac Bridge.

On the Site is a commercial office building constructed in 2007/2008 of between 4 to 5 levels with underground parking for 49 cars plus at grad parking for a further 31 cars. The four storey element is under the Anzac Bridge deck. The car park entry is at the north east end of the building. There is a small open area with parking for 3 vehicles immediately to the north east of the building but on the Site. Occupants of the building include a gym, café and offices.



James Craig Road looking south-west
Figure 1: Longitude Building



Sommerville Road looking south-west

The Site is on Glebe Island within the Bays Precinct of Sydney Harbour, approximately 2km west of Sydney CBD. Part of the Site is under the Anzac Bridge which connects the Sydney CBD with the inner west suburbs and ultimately the M4 to the west.



Figure 2: The Site in the regional context (Nearmap photo dated 21/8/18)



Figure 3: The Site and its locality looking west (Nearmap photo dated 02/07/16)

The Site has formed part of the Glebe Island maritime district for the majority of Sydney's European settlement. Located at Rozelle, Glebe Island is surrounded by White Bay (north) Johnston Bay (east), and Rozelle Bay (south). It connects to Rozelle to the west. The majority of Glebe Island is owned by the Ports Authority of NSW (NSW Ports) which supports warehouses, manufacturing plants, silos and bulk construction material transportation such as cement, gypsum and sand. Glebe Island has also been used as the temporary convention centre and previously as a car terminal. The Site is on the part of Glebe Island which is owned by RMS.

In the immediate area is Sydney City Marine to the east across James Craig Road, NSW Maritime to the south on the other side of the Anzac Bridge, and the Glebe Island Silos to the north west. Further afield, the Sydney Boathouse and Sydney Superyacht Marina face Rozelle Bay to the south west, the northern side of White Bay hosts The White Bay Cruise Terminal and other port uses occupy the White Bay berths. The heritage White Bay Power Station is at the western end of White Bay.

There are currently two other development proposals on Glebe Island which affect the visual impact of the proposal, being:

- An SSD application by Hanson Construction Materials Pty Ltd to relocate the concrete batching plant from Blackwattle Bay to Glebe Island. That application is SSD 8544 for which SEARs were issued on 7 July 2017. The Proponent is currently reviewing submissions. It allows for the relocation of the Sydney Fishmarkets to the southern end of Blackwattle Bay; and
- A Multi-User Facility for which a Review of Environmental Factors (REF) was prepared on behalf of the Port Authority of New South Wales in January 2018. It is proposed to receive, store and despatch bulk construction materials and to increase the Glebe Island wharves' capability as an operational port.

If the Multi-User Facility and Hanson's concrete batching plant are approved, the proposed alterations will appear of a minor scale in comparison.



Figure 4: View from Pymont with the proposed concrete batching plant in the centre, multi-user facility to the right and the proposal at the end of the Anzac Bridge



Figure 5: Proposal with proposed concrete batching plant and multi user terminal, looking east

There are several heritage listed items in the vicinity, including the Glebe Island Silos on Sommerville Road, the old Glebe Island Bridge adjacent to Sydney City Marine, and memorials to the Anzac and American soldiers which are both visible from Anzac Bridge.

Road access to the Site is via the City West Link and James Craig Road. The Site does not have any waterfront access.

3.0 Description of Proposed Development

The proposal will add between 5 to 8 storeys to the existing building. Design concepts include:

- Extension of the building to the north east
- A simple full glass façade with a silo influence to reflect the existing Glebe Island Silos, proposed multi user terminal silos and base of the Anzac war memorial
- Green elements on the façade
- Rooftop terrace.

The building is designed to a height of approximately 38 metres above ground level (approximately RL41.5), being approximately the same height as the proposed Hanson's concrete batching plant. This increases the height from the existing RL22.4. The Glebe Island silos will remain visible from the various viewpoints as the proposal is lower than the silos whose top is approximately RL61.0. The view to the advertising on the top of the silos from the Anzac Bridge will remain uninterrupted.

Strengthening of the existing structural pylons would be required.

The current building has a net lettable area of about 3,845m². Approximately 4800m² of additional gross floor area (approximately 4,300m² net lettable area) would be achieved. Possible employment on the Site would increase from about 366 to 775 (an addition of about 409 people). Hours would be 24 hours a day 7 days a week.



Figure 6 Proposal viewed from the south east from James Craig Road



Figure 7 Proposal viewed looking east from the Anzac Bridge on-ramp

4.0 Strategic Context

4.1 The Bays Precinct

Glebe Island forms a part of the wider Bays Precinct area which is earmarked for staged urban renewal. Within the Bays Precinct (set out under the document entitled 'The Transformation Plan: The Bays Precinct, Sydney dated October 2015), the Site is within the Rozelle Bay and Bays Waterways precinct – identified as a medium-term priority destination. Possibilities for future uses include a mix of new land and maritime uses, commercial, open space and other residential uses, with working harbour industries and on-water recreation facilities. Glebe Island (to which it is immediately adjacent) is identified as a long-term destination where work is anticipated to start after 2022.

In 2017 the Bays Growth Centre was declared, and the Site is within the Bays West area. Urban Growth NSW Development Corporation manages growth within the growth centres in metropolitan Sydney under the Growth Centres (Development Corporations) Act 1974. The May 2018¹ update identifies various 10 year projects including the proposed Multi-User Facility at Glebe Island, and transport infrastructure in the vicinity including the Sydney Metro West, the Sydney Metro city and southwest, WestConnex M4-M5 link and the Western Harbour tunnel.

4.2 The Greater Sydney Region Plan

A Metropolis of Three Cities – the Greater Sydney Region Plan released in March 2018 includes district plans. The Site is within the Eastern City District Plan. Effect will be given to these plans by the required introduction of local strategic planning statements to be drafted by councils under the EP & A Act. Planning Priority E9 of the

¹ Urban Growth Development Corporation May 2018 Project Update: Bays West
<file:///S:/Urban%20Perspectives/01%20Projects/288%20Longitude%20Extensions%20Glebe%20Island/04%20Specialist%20Studies%20and%20References/Bays-West-Project-Update-May-2018.pdf> accessed 23/10/2018

Eastern City District Plan identifies Glebe Island port functions as needing to be retained and expanded to meet the needs of the inner city and Harbour-based construction materials supply chain.

5.0 Statutory Planning Context

5.1 Environmental Planning & Assessment Act 1979

The EP & A Act establishes the assessment framework for SSD. Development consent may be granted if development is partly prohibited by an environmental planning instrument (EPI) (s4.38(3)).

Evaluation under section 4.15 applies to SSD subject to various exemptions set out in division 4.5 of the EP & A Act.

Section 4.5(a) states that the Minister is the consent authority for SSD, although under some circumstances the consent authority will be the Independent Planning Commission.

The EP & A Regulations set out the procedures for lodging an EIS which include the request and provision of SEARs.

5.2 State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)

The SRD SEPP clause 8 and Schedule 2 (clause 2(a)) declares development specified in Schedule 2 as SSD. Development with a CIV exceeding \$10 million in the Bays Precinct is SSD. The proposal, with an estimated CIV of \$19,360,000 plus GST falls within this threshold and will therefore be SSD.

Clause 8A(1) makes the Independent Planning Commission the consent authority if the Council objects, there are 25 or more objections or there is a reportable political donation.

Clause 11 makes development control plans not apply to SSD.

5.3 State Environmental Planning Policy No. 55 – Remediation of Land

State Environmental Planning Policy No. 55 – Remediation of Land (SEPP55) provides a State-wide approach to the remediation of contaminated land for the purpose of minimising the risk of harm to the health of humans and the environment. SEPP 55 requires a consent authority to consider whether the land is contaminated, if so whether it is suitable for the development and if the land requires remediation, whether the land would be suitably remediated.

Glebe Island contains reclaimed land. The proposal is to be constructed mostly on the top of an existing building and the extent of excavation would be minimal. It is unlikely that contamination will be a major concern for the proposal.

5.4 Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005

Sydney Regional Environmental Plans are taken to be environmental planning instruments (EPIs) as from 1 July 2009 (see Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017 Schedule 1 clause 120).

The Site is within the Sydney Harbour Catchment and within the Foreshores and Waterways Area, but is not zoned by SREP (Sydney Harbour Catchment). Planning principles apply and there are matters to be taken into consideration. Most importantly these will be matters relating to the scenic quality of Sydney Harbour and the maintenance, protection and enhancement of views (as detailed in clauses 25 and 26 of the SREP). A visual analysis will be required.

5.5 Sydney Regional Environmental Plan No. 26 – City West (SREP 26)

Sydney Regional Environmental Plans are taken to be environmental planning instruments (EPIs) as from 1 July 2009 (see Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017 Schedule 1 clause 120).

Sydney Regional Environmental Plan No 26 – City West (SREP 26) is the zoning instrument applicable to the Site, which zones the part of the Site on which the development is proposed as Ports and Employment. Permissible uses in SREP 26 is objective based as set out in clause 20C. The most relevant objective is *“to encourage a mix of uses which generate employment opportunities, particularly in relation to port and maritime uses”*. The proposed use will continue the current uses of general commercial office space. Given the volume of infrastructure construction proposed in the immediate area over the next decade it is quite possible that these offices may be used as bases for those operations. As the proposal is additions to an existing office building, the proposal will not impede the continued operation of the commercial port uses. With the addition of approximately 4,300m² net lettable area, it is likely that the building will be able to support up to a further approximately 409 workers in the area. The proposed alterations will be consistent with the objectives of the zoning to encourage a mix of uses which generate employment opportunities.

No height or floor space ratio restrictions are set out in SREP26. SREP26 provides for masterplans to be adopted.

5.6 Draft State Environmental Planning Policy (Environment)

The Draft Environment SEPP has been exhibited which will repeal and replace SEPP (Sydney Harbour Catchment) 2005 if made. The Site is within the Sydney Harbour Foreshore Lands under the draft SEPP Environment maps. The explanation of intended effects does not indicate that there will be any great variation to relevant controls to the existing SREP (Sydney Harbour Catchment) 2005.

5.7 State Environmental Planning Policy (Coastal Management) 2018

Under this SEPP the Site is:

- In the Coastal Use Area, and

- In the Coastal Environment Area.

Whilst these clauses require consideration of various matters including access to foreshores, overshadowing, wind funnelling, loss of view from public places to foreshores, visual amenity and scenic qualities, heritage, water quality, and the biophysical, ecological and hydrological processes, they are of no effect if the land is in the Foreshores and Waterways Area under SREP (Sydney Harbour Catchment) 2005 (see cl 13 and 14 of the Coastal SEPP).

5.8 Rozelle and Blackwattle Bays Maritime Precincts Master Plan

Master Plans made under EPIs are taken to be development control plans (DCPs) (see Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017 Schedule 1 clause 120).

As noted above, clause 11 of the SRD SEPP states that DCPs do not apply to SSD.

The Rozelle and Blackwattle Bays Maritime Precincts Master Plan (the Master Plan), was drafted by the landholder at the time (the Waterways Authority) pursuant to SREP26. It was adopted in 2002. The Site is identified as site R2b where the preferred land uses are:

- Charter vessels
- General mixed marine
- Commercial marine offices
- Layover berths
- Food & retail outlet ancillary to the main use
- Waterways operations

Under the Master Plan, the building height of the Site is RL23.0 (building height of 20 metres) with a site coverage of 50%. A 5 metre setback to James Craig Road (and also Sommerville Road) is shown. There are no viewpoints or view corridors identified in the Master Plan which are affected by the proposal. The Master Plan also requires sufficient onsite parking to be onsite to meet expected demands.

The proposal will exceed the height limit of the Master Plan, and the building already exceeds the site coverage. Whilst the proposed commercial offices may not comply with the preferred land uses under the Master Plan they do comply with the zoning objective of encouraging employment generating opportunities under SREP26.

5.9 Sydney Harbour Foreshores and Waterways Area Development Control Plan 2005

The Sydney Harbour Foreshores and Waterways Area Development Control Plan 2005 applies to all land within the Foreshores and Waterways Area identified in SREP (Sydney Harbour Catchment) 2005. Subject to clause 11 of the SRD SEPP, it would otherwise have applied to the Site. Map 8 of the DCP does not identify any ecological communities in the area or landscape character types. Design guidelines for land-based developments are set out, the most relevant being:

- Buildings should not obstruct views and vistas from public places to the waterway, nor obstruct views of landmarks and features identified on the maps accompanying the DCP (no landmarks are identified in the area) (section 5.3); and
- Have a built form which is sympathetic to their surroundings (section 5.4).

5.10 Leichardt Development Control Plan (Leichardt DCP)

The Site is within the Inner West Council area. Leichardt DCP (which applied to the former Leichardt Council LGA) has some relevance to the Site, however, as above, DCPs are not taken into consideration for SSD projects. The Leichardt DCP contains parking provisions in Part C1.11 which includes maximum and minimum rates for commercial space. No additional car spaces are proposed.

6.0 Overview of Likely Environmental Impacts

Based on the preliminary environmental assessment, the following are the key environmental assessment issues likely to be considered as part of the future EIS:

- Visual Impacts (particularly from Pymont and the Anzac Bridge)
 - A view analysis will be provided. The proposal has been kept below the existing silos so as not to block views of the advertising. The glazed shape allows for some view through to the existing silos.
 - View analysis from Pymont will be provided. The preliminary view from Pymont (figure 4 above) illustrates that when seen in conjunction with the proposed Multi-User Facility and the Hanson's Concrete Batching Plant, the visual impact will be relatively modest.
- Traffic and transport
 - No additional parking is proposed for the Site. It is envisaged that a travel plan will likely be required to assist with transport until such time as public transport to the immediate area is facilitated.
 - The EIS will include traffic modelling and an assessment to consider the impact on traffic in the immediate area.
- Heritage
 - The Site is located on highly impacted and reclaimed land with the majority of the construction on the top of an existing building. Assessment of Aboriginal Heritage is likely to be limited to a due diligence assessment.
 - Glebe Island contains a number of heritage items, including:
 - Glebe Island Bridge approach
 - Glebe Island Dyke exposures
 - Glebe Island Silos
 - Glebe Island World War II Monument
 - Glebe Island Plaque – Opening of the Container Terminal
 - Only the Glebe Island Silos are listed as of state significance. The proposal is not expected to impact directly on any heritage items, although will be in close proximity to the silos and World War II monument. A Statement of Heritage Impact will be prepared to accompany the EIS.
- Waste Management

- A construction waste management plan will accompany the EIS. Waste from operations will be managed in a similar manner to the way in which waste is currently managed from the building.
- Acoustic
 - The building will be within a port environment. Acoustic treatments of the building are likely to be necessary as guided by an acoustic assessment to be provided with the EIS.
- Other matters:
 - Social - the proposal will provide additional employment in the area
 - Air Quality – the two major proposals of the Multi-User Facility and the Hansons Concrete Batching Plant have assessed the impacts of their proposed uses. It is not considered likely that any substantial air quality analysis will be required, given that the office use is already present on Site and considered as part of the assessment for those proposals.
 - Contamination and Remediation – the Site is not undergoing a change in land use or introducing a more sensitive land use. The only excavation required will be for the installation of piles and footings. It is expected to be considered suitable for the continuation of a commercial use without remediation.
 - Biodiversity – The Site is already mostly covered by the existing building, with the small remainder as hardstand. The Site contains no vegetation or habitat. No further ecological assessment is considered necessary.
 - Sustainability – the sustainable features of the proposed additions will be set out in the EIS.

7.0 Justification

The proposal will increase the amount of commercial office space in an area which is about to undergo a period of growth. It will be ideally located to provide a base for offices seeking to operate within the declared growth centre. The proposal will not have any impact on the possible use of the area under the Bays Precinct Urban Growth vision, as it simply builds upon the existing building footprint (with a very small addition).

If the Site has a net lettable area of about 8000m², it becomes of a size which large companies can consider leasing, particularly given the close location to the City.

8.0 Consultation

Ozton Pty Limited has consulted with the RMS. Consultation will also need to be undertaken with the following stakeholders as part of the preparation of the EIS:

- Urban Growth – regarding future development within the immediate area
- RMS – as both land holder and in relation to traffic and parking impacts
- Inner West Council
- Port Authority of NSW
- Office of Heritage and Environment – NSW Heritage

9.0 Conclusion

Being development which will exceed \$10 million in CIV and within the Bays Precinct, the proposal is identified as state significant development by the SRD SEPP. This letter is to request the SEARs for the preparation of an EIS for the alterations and additions to the existing commercial building on Glebe Island. If the information detailed in this letter is insufficient please do not hesitate to contact me on 8071 4588 or ros@urbanperspectives.com.au.

Yours sincerely

A handwritten signature in black ink that reads "Rosalind Read". The signature is written in a cursive, flowing style.

Rosalind Read
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