

SSD 6751 – Sandstone Precinct Stage 1 SSDA - City of Sydney comments on Response to Submissions Report

Issued raised in City submission	Applicant response	Issue addressed?	City's contention
Support land use and extension of buildings to height of structures above Education Building.	Response to Submission discusses alternative land uses that have been considered. However, the Applicant reinforces the desire for hotel accommodation.	Yes	The City continues to support the proposed land use.
<p>Align planning and approvals processes at the Stage 2 DA phase for the SSD components and the non-SSD components. Development beyond the property boundaries of the buildings is not SSD.</p> <p>The Minister should delegate the assessment of the Stage 2 DA to the City of Sydney. The City can deal with the development application and subterranean use concurrently.</p>	<p>The Stage 2 DA will qualify as SSD as it will have a capital investment value of more than \$10million on land which includes items on the State Heritage Register.</p> <p>The Minister can delegate the Stage 2 DA to the City of Sydney.</p> <p>However, the Applicant believes it is appropriate for the assessment and determination of the Stage 2 DA given the State heritage significance of the buildings.</p>	No	<p>The City of Sydney and Central Sydney Planning Committee (CSPC) has extensive expertise and past experience assessing adaptive re-use of buildings with high heritage significance. Prominent adaptive re-use projects include the Westin Hotel within the former GPO and the Radisson Hotel on O'Connell Street.</p> <p>The Applicant's EIS argues, and the City agrees, that a subterranean pedestrian connection between the buildings is critical to the success of the project and the use of subterranean space for services and back-of-house is fundamental to the preservation of the significance of the heritage items.</p> <p>The City has subsequently had enquiries regarding aboveground use of the road reserves and Farrer Place for ancillary and associated hotel uses. This is speculative and is subject to further discussions with the City. However, it is indicative of the perceived importance (to project risk and feasibility) of connecting the hotel use to the</p>

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			<p>surrounding public domain.</p> <p>Given the importance being placed on opportunities beyond the boundaries of the buildings, the aspirations of the development may only be fully realisable with the City of Sydney Council's support.</p> <p>A Stage 2 DA reliant upon land under the care and control of the City of Sydney, or others, in circumstances where the City of Sydney has no role in the assessment and determination, is an avoidable scenario.</p> <p>Currently the planning approvals process and the acquisition of any rights to use land beyond the boundaries are not aligned. The City of Sydney is best placed to work through both processes. The City of Sydney, and by extension the CSPC exercising the City's determinations, should logically be the consent authority for the Stage 2 DA.</p>
<p>Prior to lodgement, the Stage 2 detailed design should be subject to a competitive design process.</p>	<p>Subservient additions to the buildings are required and "transformational architectural statements" are to be avoided.</p> <p>A competitive design process is unreasonable and unnecessary for any Stage 2 DA. The project does not rely on additional height or FSR arising from a design competition. The building envelope will not have</p>	<p>No</p>	<p>The City rejects the contention that subservient additions preclude architectural expression. A subservient addition is one with relative bulk and scale compared to the host building. Any addition to a heritage item should have the ability to be read as a contemporary projection from the host. A competitive design process facilitates the achievement of design excellence by testing assumptions, offering alternative points-of-view and generating a creative tension</p>

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	<p>any adverse impacts on views from public spaces or impacts on adjoining buildings and the public domain.</p> <p>Government Properties are seeking a long term lease of the buildings. Proponents have been shortlisted and are committed to delivering particular design outcomes to inform their feasibility and offer to government. Requiring a design competition would replicate the work already done by shortlisted parties who have been working closely with chosen architects and chosen heritage specialists.</p> <p>Government Properties disagrees that a design competition is the best mechanism to achieve the desired design outcomes for the Stage 2 DA. Ongoing design consultation between the future applicant, City of Sydney and Heritage Council will be required prior to the Stage 2 DA.</p> <p>Government Properties would be willing to appoint a "carefully selected" design review panel to "provide feedback" prior to the Stage 2 DA.</p>		<p>between commercial objectives and design objectives.</p> <p>The achievement of design excellence is relevant in the planning assessment process. The bid price to government, based on a particular future design, is not a relevant consideration. Linking commercial objectives to the planning assessment process is an undesirable precedent.</p> <p>The Applicant's offer to appoint a design review panel is noted. However, the City encourages the successful bidder to run a competitive design process containing at least 3 architectural practices with an experienced jury / design review panel and transparency of process.</p>

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<p>Further discussions with the City of Sydney regarding the proposed subterranean use.</p> <p>The subterranean space is outside the SSD boundaries.</p> <p>The Stage 1 consent cannot provide any entitlement for the subterranean space. The current application will need to be assessed on the basis that the subterranean space is not included.</p> <p>Council resolutions would be necessary for any lease or stratum entitlement, following negotiation on terms.</p>	<p>There are mixed messages within the Response to Submissions.</p> <p>Page 2 infers that the Stage 1 DA seeks consent only for (a) the use of the buildings for tourist and visitor accommodation and (b) a building envelope for an extension that is defined by a maximum height. This does not mention the use of the subterranean space below the road reserves.</p> <p>Generally though, the Response to Submissions reads as though the subterranean links are part of the proposal and argues that the use should not be excised from the DA.</p>	<p>No</p>	<p>There is no ability to gain an approved building envelope within the subterranean space in the absence of agreement with the City of Sydney through Council resolutions and approvals. Any reference in the Stage 1 consent to use of subterranean space will not provide any entitlement. The indicative use can only remain conceptual at this stage. Approvals are required under the EP&A Act, Roads Act, Local Government Act and possibly also the City of Sydney Act in the case of the Central Sydney Traffic and Transport Committee having to review aboveground proposals in road reserves.</p> <p>Any Stage 1 consent granted should be granted on the basis that the development can function and be delivered with or without use of subterranean space.</p> <p>The Applicant has rejected the delegation of the Stage 2 DA assessment to the City of Sydney.</p>
<p>Rationalise the building extension above the Education Building, subject to Heritage Council advice. Provide a further 2m setback from the existing building footprint on the southern, eastern and western sides.</p>	<p>Increasing the setbacks is inappropriate. The proposed envelopes provide a degree of flexibility.</p> <p>The envelope is setback from Bridge Street, the primary street address and area of significance in the streetscape.</p> <p>The setbacks on the south, east</p>	<p>Yes</p>	<p>The setbacks and composition of the extension are to be resolved at the Stage 2 DA phase.</p> <p>However, the Heritage Council's recommended requirements should not be read as a lack of recommendations on setbacks. The Heritage Council's intent appears to be to establish broader principles about dominant and subservient</p>

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	<p>and west elevations are generally consistent with the existing structures.</p> <p>The Heritage Council has recommended detailed design conditions regarding the roof top extension. This includes articulation with setbacks and stepped roof heights to maintain the visual prominence, architectural style, form and features.</p> <p>Increasing the setback before the detailed design has been carried out is premature and could prevent a great design outcome or prevent an economically viable outcome prior to the Stage 2 DA.</p> <p>.</p>		<p>relationship between old and new. That may ultimately lead to increased setbacks from the leading edge of the building, stepped roof heights and other mitigation measures.</p> <p>The existing structures on the roof, including less significant caretakers accommodation, roof over Level 10 and plant/lift motor rooms do not create an entitlement when the new additions will be significantly larger and more visible.</p> <p>Tensions between economic viability and heritage conservation should be addressed earlier in the approvals process to provide realistic expectations.</p> <p>The City remains of the view that the roof extension is too large and should probably be rationalised. At this stage, it is not yet resolved whether the proposed setbacks are appropriate.</p> <p>The City, reluctantly, defers further commentary at this stage in order to review how successfully visual subservience can be achieved following the Stage 1 DA.</p>
Approach the roof of the Education Building as a fifth architectural elevation.	Not mentioned.	N/A	The City's desire to approach the roof of the extension as a fifth elevation remains important and should be captured in conditions of consent.

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<p>Support the provision of minimal car parking on site. Any kerb-side parking or drop off must be integrated with long term transport planning.</p>	<p>The Applicant notes that pick-up and drop-off areas will depend on the detailed design and developer/hotel operator preferences which will need to be resolved as part of the Stage 2 DA. This can be resolved with appropriate conditions of consent specifying the further assessment requirements for Stage 2.</p>	<p>No</p>	<p>Conditions on the Stage 1 consent cannot fetter property rights beyond the boundaries of the buildings. The SSD component is limited to the re-use of the buildings.</p> <p>Pick-up and drop-off arrangements are subject to agreement with the City on land under the care and control of the City. The Stage 2 DA assessment should be delegated to the City and determined by the CSPC. Without this, the realisation of the project may be constrained.</p>
<p>Upgrading of the public domain will be necessary.</p>	<p>Not mentioned.</p>	<p>N/A</p>	<p>The City expects that the surrounding public domain will be upgraded upon redevelopment, as is the expectation on all significant development.</p>