

Environmental Impact Statement



THE SANDSTONE PRECINCT 23-33 BRIDGE STREET AND 35-39 BRIDGE STREET, SYDNEY

DECEMBER 2014



Government
Property NSW

urbis

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Signed Declaration

SUBMISSION OF ENVIRONMENTAL IMPACT STATEMENT

The EIS has been prepared in accordance with Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*.

Environmental Assessment prepared by:

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Address	Urbis Pty Ltd Level 23, Darling Park Tower 2, 201 Sussex Street, Sydney, NSW, 2000
In respect of	Sandstone Precinct Stage 1 State Significant Development Application

Applicant and Land Details:

APPLICANT	GOVERNMENT PROPERTY NSW C-/ URBIS
Applicant address	Level 9, 4-6 Bligh Street Sydney GPO Box 5341 Sydney NSW 2001
Land to be developed	23-33 Bridge Street, Sydney (Lands Building), 35-39 Bridge Street, Sydney (Education Building) and road and public reserve(s) at Gresham Street, Loftus Street and Farrer Place.
Project	Sandstone Precinct Stage 1 State Significant Development Application

Declaration

I certify that the contents of the Environmental Impact Assessment to the best of my knowledge, has been prepared as follows:

- In accordance with the requirements of the Schedule 2 of *Environmental Planning and Assessment Regulation 2000*; and *State Environmental Planning Policy (State and Regional Development) 2011*.
- The information contained in this report is true in all material particulars and is not misleading.

NAME

TIM BLYTHE, REGIONAL DIRECTOR

ANDREW HARVEY, ASSOCIATE
DIRECTOR

Signature



Date

27 November 2014

27 November 2014

Executive Summary

- On behalf of Government Property NSW (GPNSW) this is an Environmental Impact Statement (EIS) prepared in response to Secretary's Environmental Assessment Requirements (SEARs) relating to the unique opportunity to adaptively re-use two iconic heritage buildings at 23-33 Bridge Street and 35-39 Bridge Street, Sydney (the 'Sandstone Precinct') for high quality tourism and visitor accommodation.
- The project will provide much needed visitor accommodation in the Sydney CBD, as well as a range public benefits central to City of Sydney Council's aims and objectives of the site's 'Metropolitan Centre' zoning, including increased street activation and revitalisation of the northern end of Sydney CBD which will greatly strengthen the City's role in the global economy. This will encourage a range of new opportunities for workers, visitors and the wider community in a centrally located, highly accessible part of the CBD.
- In response to the State Government's various tourism initiatives, including *NSW 2021 A Plan to Make NSW Number One* and *Visitor Economy Industry Action Plan*, GPNSW has identified the 'Sandstone Precinct' as a preferred location for tourism and visitor accommodation uses and in late 2013 sought 'Registrations of Interest' (ROI) and a recent 'Expression of Interest' (EOI) in October 2014 from developers, investors and hotel operators who have an interest in adaptively re-using the buildings for these purposes.
- GPNSW is seeking approval from The Minister for Planning for a Stage 1 Development Application which establishes a development 'concept', with detailed design elements and physical works to be subject to a later separate (Stage 2) development application.
- The Stage 1 DA will seek approval for the use of the Sandstone Precinct for tourist and visitor accommodation (and ancillary uses) and a building envelope defined by a maximum building height that will facilitate the adaptive re-use, extensions and alterations to the existing buildings.
- It is also intended to use this Stage 1 DA process to establish the potential for subterranean linkage between the two buildings as well as subterranean opportunities for the provision of hotel and associated ancillary services and support infrastructure, including but not limited to such as back of house facilities, loading, access and car parking that could be located under existing road reserves and Farrar Place. The ultimate opportunity for the use of subterranean space will be subject to separate agreement with the City of Sydney.
- This EIS provides a response to the key assessment issues identified in the SEARs and is supported by specialist technical studies which accompany this report. Ongoing consultation with key agencies has been undertaken by these consultants and the applicant in the preparation of the EIS.
- In summary, the project has the following key public benefits and should be supported for the following reasons:
 - The project will provide much needed tourist and visitor accommodation which supports the actions and objectives of the State Government's plan to double the visitor expenditure of NSW by 2020 and address the visitor accommodation shortage in Sydney. This will reinforce and enhance Sydney's position in the global economy.
 - A project of this scale has the potential to create 2,054 full-time jobs (based on multiplier effects) during the construction and operational phases of the project.
 - The proposed development concept and adaptive re-use of the existing heritage items has been designed in a manner which reduces any impacts on the heritage significance of these buildings, and on the surrounding public domain. The Statement of Heritage Impact and Conservation Management Plans (in the process of being updated) provide a framework for the ongoing conservation and assessment of the future, detailed design components by the future long term leaseholder of the site.

- The proposal will provide a high level of pedestrian and street activation in the northern end of Sydney CBD and stimulate the night economy comparative to the current office uses of the existing buildings.
- The proposal responds positively to the strategic and statutory planning framework which relates to the site. The project is consistent with the aims and objectives of a range of State, Regional and Metropolitan planning initiatives, and satisfies the City of Sydney's local objectives and key development standards of Sydney Local Environmental Plan 2012 (SLEP 2012).
- The supporting technical studies which accompany this EIS establish that the environmental impacts of the proposed concept are generally positive, and where appropriate, make recommendations for the detailed design phase of the project which will provide certainty and clarity to guide the Stage 2 DA.
- The proposal has been through ongoing consultation with key government agencies including City of Sydney Council, NSW Department of Planning and Infrastructure (DPI), NSW Heritage Branch, Transport for NSW and the State Transit Authority prior to the lodgement of this application. This has assisted with shaping the SEARS for the project, and providing a response to a range of queries on the project.
- The Stage 1 DA process seeks to provide certainty about the use, key development parameters, and adaptive re-use potential of the existing buildings on the site. This approach provides a framework for a later Stage 2 DA which will seek approval to any physical works required.

1 Introduction

1.1 PURPOSE OF THIS REPORT

This report has been prepared on behalf of Government Property NSW ('the applicant') in support of a Stage 1 State Significant Development Application (SSDA) for the use of 23-33 Bridge Street and 35-39 Bridge Street, Sydney (herein referred to as the 'Sandstone Precinct') for tourist and visitor accommodation (and ancillary uses) and a building envelope consisting of a maximum building height and a subterranean envelope that will facilitate the adaptive re-use, extensions and alterations to the existing buildings on the site.

The EIS provides a response to the Secretary's Environmental Assessment Requirements (SEARs) issued on 14 November 2014, providing commentary on the key issues relevant to the application including compliance with the strategic planning framework, built form and urban design, amenity, heritage, subterranean works, traffic parking and access, infrastructure impacts, ESD and consultation.

This report is structured in the following manner:

- Site details;
- An overview of the proposed development;
- A summary of the existing statutory planning framework;
- A response to the key environmental assessment issues as identified in the SEARs.

The EIS has been prepared in accordance with a range of technical inputs including:

- Architectural Concept Plans, View Impact Analysis and Shadow Analysis – JPW Architects
- Statement of Heritage Impact – Graham Brooks & Associates
- Traffic, Parking and Access - ARUP
- Ecologically Sustainable Development (ESD) - ARUP
- Archaeology - Urbis

1.2 BACKGROUND

'NSW 2021 A Plan to Make NSW Number One' is the State Government's 10 year plan to guide policy and decision making and has a key objective of increasing tourism in NSW by aiming to double the visitor expenditure by 2020.

The establishment of *Destination NSW* and the preparation of the *Visitor Economy Industry Action Plan* are key initiatives which provide specific actions that reinforce the Government's commitment to the visitor economy of the State. One of the specific recommendations from the *Visitor Economy Industry Action Plan* is to demonstrate leadership and focus on the immediate accommodation shortage in Sydney.

In response to the State Government's various tourism initiatives, Government Property NSW (GPNSW) has identified the 'Sandstone Precinct' as a preferred location for tourism and visitor accommodation uses and in late 2013 sought 'Registrations of Interest' (ROI) from developers, investors and hotel operators who had an interest in adaptively re-using the buildings for these purposes.

A central theme from various responses to the ROI was the need for more certainty around the planning approval process, particularly in relation to the future land use of the buildings and their key development standards (principally building height and density).

Therefore, to assist with providing further certainty to potential long term leaseholders, GPNSW is seeking approval from the Minister for Planning for a Stage 1 Development Application which establishes a development 'concept', with detailed design elements and physical works to be subject to later separate stage 2 development applications.

1.3 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS (SEARS)

A request was made to the Minister for the Secretary's Environmental Assessment Requirements (SEARs) under Section 75F of the *Environmental Planning and Assessment Act 1979*, for the preparation of an environmental assessment. The SEARs are addressed within this report and included in full at Appendix A. The table below provides a summary of the Secretary's Requirements and outlines where in the body of the report, or specialist consultants' reports, the SEARs are addressed.

TABLE 1 – SECRETARY'S ENVIRONMENT ASSESSMENT REQUIREMENTS

REQUIREMENT	COMMENT
General Requirements	
The Environmental Impact Statement (EIS) must address the <i>Environmental Planning and Assessment Act 1979</i> and meet the minimum form and content requirements in clauses 6 and 7 of Schedule 2 the <i>Environmental Planning and Assessment Regulation 2000</i> .	This meets the meet the minimum form and content requirements in clauses 6 and 7 of Schedule 2 the <i>Environmental Planning and Assessment Regulation 2000</i> ..
Notwithstanding the key issues specified below, the EIS must include an environmental risk assessment to identify the potential environmental impacts associated with the development. Where relevant, the assessment of the key issues below, and any other significant issues identified in the assessment, must include: - adequate baseline data; - consideration of potential cumulative impacts due to other development in the vicinity; and - measures to avoid, minimise, and if necessary, offset the predicted impacts, including detailed contingency plans for managing any significant risks to the environment.	Refer to Section 6.
The EIS must be accompanied by a report from a qualified quantity surveyor providing: a detailed calculation of the capital investment value (as defined in clause 3 of the <i>Environmental Planning and Assessment Regulation 2000</i>) of the proposal, including details of all assumptions and components from which the CIV calculation is derived	Refer to Capital Investment Value Report included at Appendix B.

REQUIREMENT	COMMENT
an estimate of the jobs that will be created by the development during the construction and operational phases of the development; and	Refer to Capital Investment Value Report included at Appendix B. The project has the potential for 2,054 full time jobs (based on multiplier effects) during the construction and operational phases of the development.
certification that the information provided is accurate at the date of preparation.	Refer to Capital Investment Value Report included at Appendix B.
Key Issues	
1. Relevant EPIs, Policies and Guidelines Address the relevant the planning provisions applying to the site, including, permissibility and the provisions of all plans and polices including:	
<i>Environmental Planning and Assessment Act 1979;</i>	Refer to Section 4.1
<i>State Environmental Planning Policy (State and Regional Development) 2011;</i>	Refer to Section 4.2
<i>State Environmental Planning Policy (Infrastructure) 2007;</i>	Refer to Section 4.3
<i>State Environmental Planning Policy No 55 - Remediation of Land;</i>	Refer to Section 4.4
<i>Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005; and</i>	Refer to Section 4.5
<i>Sydney Local Environmental Planning Plan 2012.</i>	Refer to Section 4.6
Address the relevant planning provisions, goals and strategic planning objectives in the following: <i>NSW 2012;</i>	Refer to Section 5.1
<i>Draft Metropolitan Strategy for Sydney to 2031;</i>	Refer to Section 5.2
<i>Sydney City Draft Sub-Regional Strategy;</i>	Refer to Section 5.3
<i>Sydney Development Control Plan 2012;</i>	Refer to Section 5.5
<i>Planning Guidelines for Walking & Cycling;</i>	Refer to Section 5.7
<i>Sydney City Centre Access Strategy;</i>	Refer to Section 5.8
<i>Sydney's Cycling Future; and</i>	Refer to Section 5.9

REQUIREMENT	COMMENT
▪ <i>Sydney's Walking Future</i>.	Refer to Section 5.10
2. Built form and Urban Design The EIS shall:	Refer to Section 6.3
▪ address the height (including plant), bulk, scale and setbacks of the proposal within the context of the locality, the heritage significance of the site and the Sydney LEP 2012;	Refer to Section 6.3
▪ undertake a view analysis including photomontages and perspectives of each elevation and 3 dimensional images of the proposed vertical additions to the Education Building, addressing: – key elements and views of the development from key locations;	Refer to View Impact Analysis prepared by JPW Architects included at Appendix H.
– key views, vistas and view corridors from the public domain and residential buildings that may be impacted as determined by the view analysis;	Refer to Section 6.3
– planning principles for impacts on private and public domain views; and	Refer to Section 6.3
– potential design considerations aimed at mitigating any impacts.	Refer to Section 6.3
3. Amenity The EIS shall demonstrate how the proposal will achieve a high level of environmental amenity, in particular overshadowing implications on the public realm from the vertical additions to the Education Building.	Refer to Section 6.4
4. Heritage The EIS shall provide a Heritage Impact Assessment which addresses:	Refer to the Statement of Heritage Impact (SHI) prepared by Graham Brooks included at Appendix F .
▪ all heritage items (state and local) including the subject sites and surrounding sites, and why the items and sites are of heritage significance, what impact the proposed use will have on the significance, what measures are proposed to mitigate negative impacts, and why more sympathetic solutions are not viable;	Refer to Section 1.4 and 1.5 of the HIS at Appendix F .
▪ impacts of the proposed use on the visual character of the area and its historical associations with government uses;	Refer to Section 3 of the HIS at Appendix F .

REQUIREMENT	COMMENT
the suitability of the site for the proposed use and its implications on heritage conservation, including discussion on any other uses that have been considered and discounted;	Refer to Section 3 of the HIS at Appendix F.
impacts of potential changes to the public domain, including access and landscaping;	Refer to Section 3 of the HIS at Appendix F.
updated Conservation Management Plan(s) for the two buildings, addressing the proposed use including measures to minimise impacts of future development of the site; and	Refer to Section 6.5
a preliminary archaeological assessment of the potential for Aboriginal cultural heritage, European cultural heritage and other archaeological items on the site, how such archaeology would be impacted by the proposal, and potential mitigation, in-situ conservation and interpretation measures for any archaeological resources uncovered during the works.	Refer to the Archaeological Assessment prepared by Urbis included at Appendix G
5. Subterranean Works The EIS shall:	
provide further detail regarding the proposed substratum space to create a pedestrian connection between the two buildings and the use of the sub terrain below Farrer Place for the provision of hotel and associated ancillary services and support infrastructure, including but not limited to such as back of house facilities, loading, access and car parking; and	Refer to Section 6.6
demonstrate that the proposed development below ground level at Farrer Place (zoned Public Recreation) is consistent with the Sydney LEP 2012 and will not have any adverse impacts on the recreational use of the space.	Refer to Section 6.6
6. Traffic, Parking and Access The EIS must include a Traffic Impact Assessment (TIA) that evaluates:	Refer to the Traffic Impact Assessment prepared by ARUP included at Appendix J
existing transport networks;	Refer to Section 2.1 of the Traffic Impact Assessment at Appendix J
daily and peak traffic movements generated by the project;	Refer to Section 2.3 of the Traffic Impact Assessment at Appendix J
safety and performance of the surrounding road network;	Refer to Section 3.5 of the Traffic Impact Assessment at Appendix J

REQUIREMENT	COMMENT
demonstration of the provision of sufficient car parking in accordance with the relevant guidelines/standards and/or justification for any inconsistencies;	Refer to Section 3.5 of the Traffic Impact Assessment at Appendix J
connections to existing and planned public transport;	Refer to Section 2 & 3 of the Traffic Impact Assessment at Appendix J
pedestrian and cycle access within and to the site;	Refer to Section 2 & 3 of the Traffic Impact Assessment at Appendix J
any proposed temporary or permanent changes to transport and access on surrounding streets;	No changes to transport and access are proposed at Stage 1.
opportunities to provide safe and efficient loading and servicing for the development; and	Refer to Section 3 of the Traffic Impact Assessment at Appendix J
mitigation measures for the impacts identified in the TIA.	Refer to Section 3.9 of the Traffic Impact Assessment at Appendix J
Relevant Policies and Guidelines: <i>Guide to Traffic Generating Development (RMS);</i>	Refer to the Traffic Impact Assessment at Appendix J
<i>EIS Guidelines – Road and Related Facilities;</i>	Refer to the Traffic Impact Assessment at Appendix J
<i>NSW Planning Guidelines for Walking and Cycling;</i>	Refer to Section 5.7
<i>Sydney City Centre Access Strategy; and</i>	Refer to Section 5.8
<i>Sydney Local Environmental Plan 2012 car parking rates.</i>	Refer to the Traffic Impact Assessment at Appendix J
7. Infrastructure Impacts - Interim Rail Corridor The EIS shall detail the likely effect of the proposal in consultation with Transport for NSW on:	Refer to Section 6.8
the maximum extent of in ground works, including submission of detailed sections and elevations which show the RL depth of excavation;	Refer to Section 6.8
the practicability and cost of carrying out rail expansion projects on the land in the future;	Refer to Section 6.8
the structural integrity or safety of, or ability to operate, such rail projects; and	Refer to Section 6.8

REQUIREMENT	COMMENT
the land acquisition costs and costs of construction, operation or maintenance of such projects.	Refer to Section 6.8
8. Ecologically Sustainable Development (ESD) Identify how the development will incorporate ESD principles in the design, construction and ongoing operation phases of the development.	Refer to Section 6.9 and the ESD Report included at Appendix K
9. Consultation During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners. In particular you must consult with City of Sydney Council, Roads and Maritime Services, Heritage Council of NSW, and Transport for NSW.	Refer to Section 6.10
The EIS must describe the consultation process and the issues raised, and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.	Refer to Section 6.10
Further consultation after 2 years If you do not lodge a development application and EIS for the development within 2 years of the issue date of these SEARs, you must consult further with the Secretary in relation to the preparation of the EIS.	This submission of this development application satisfies this.
Plans and Documents	
The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the <i>Environmental Planning and Assessment Regulation 2000</i>. Provide these as part of the EIS rather than as separate documents. In addition, the EIS must include the following:	This EIS is prepared in accordance with the requirements of the Regulations and is submitted with a range of supporting items which are attached at various appendices to this document.
1. An existing site survey plan drawn at an appropriate scale illustrating: - the location of the land, boundary measurements, area (sq.m) and north point; - the existing levels of the land in relation to buildings and roads; - location and height of existing structures on the site; - location and height of adjacent buildings and private open space;	Refer to Appendix C

REQUIREMENT	COMMENT
and ▪ all levels to be to Australian Height Datum (AHD).	
2. A locality/context plan drawn at an appropriate scale should be submitted indicating: ▪ significant local features such as heritage items; ▪ the location and uses of existing buildings, shopping and employment areas; and ▪ traffic and road patterns, pedestrian routes and public transport nodes.	Refer to Appendix C
3. Drawings at an appropriate scale illustrating: ▪ the location of any existing building envelopes or structures on the land in relation to the boundaries of the land and any development on adjoining land; ▪ detailed plans, sections and elevations including all temporary and permanent structures; ▪ the height (AHD) of the proposed development in relation to the land; and ▪ shadows from the Education Building showing solar access to the site and surrounding areas at summer solstice (Dec 21), winter solstice (June 21) and the equinox (March 21 and September 21) at 9.00 am, 12.00 midday and 3.00 pm.	Refer to Appendix C.

2 Site and Contextual Analysis

2.1 SITE DESCRIPTION

The subject site is known as The Sandstone Precinct and is a strategically significant site, located in a prominent position in the Sydney CBD. The subject site, for the purposes of this SSD application, comprises land known as 23-33 Bridge Street and 35-39 Bridge Street, Sydney and the adjacent road and public reserve areas of Loftus Street, Gresham Street and Farrer Place. The site has an overall area of 9,370m. The title details of the site are set out in the table below:

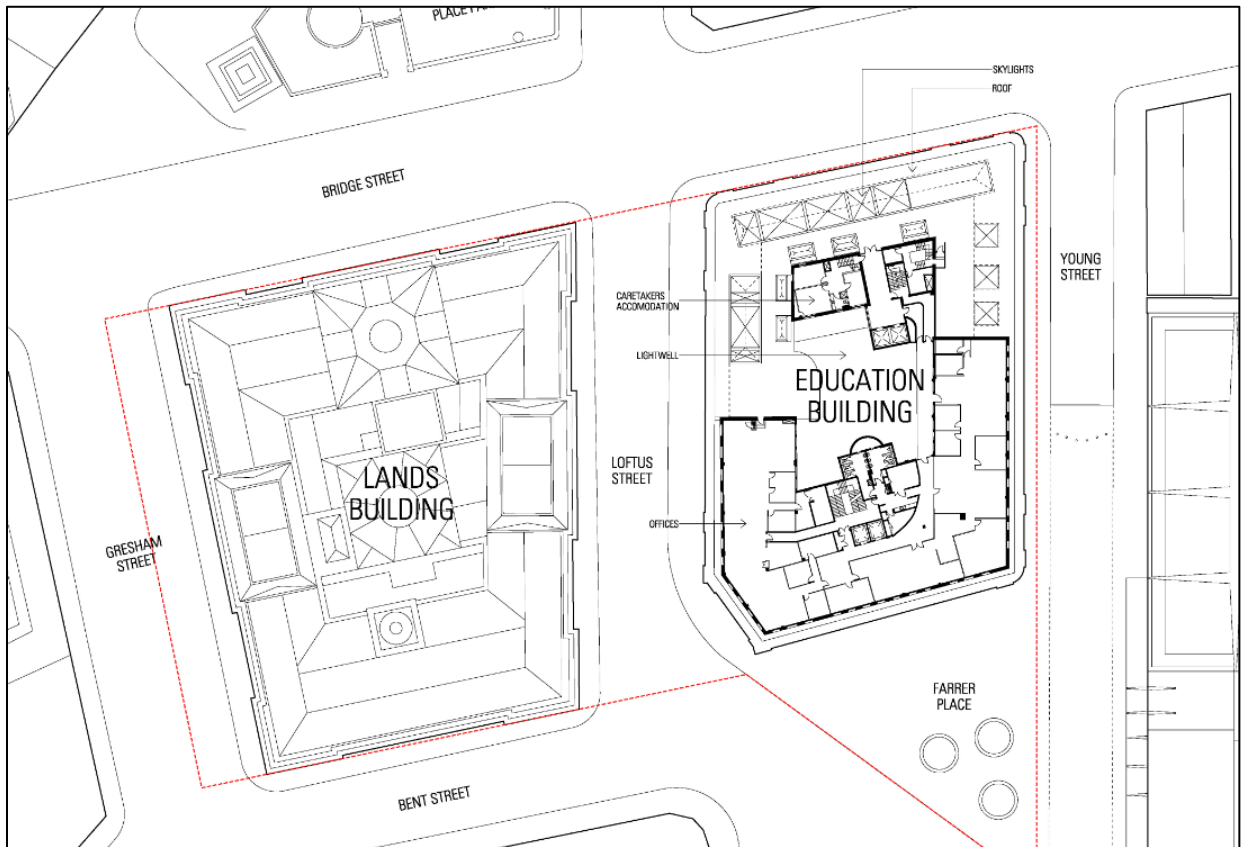
PROPERTY	STREET ADDRESS	LOT	DP	APPROXIMATE SITE AREA
Lands Building	23-33 Bridge Street, Sydney	1877	877000	3,350m ²
Education Building	35-39 Bridge Street, Sydney	56	729620	2,795m ²
Road & Public Reserve (s)	Gresham Street, Loftus Street & Farrer Place	-	-	3,220m ²

FIGURE 1 – AERIAL PHOTOGRAPH OF SITE



Source: Near Map (showing 11 September 2014)

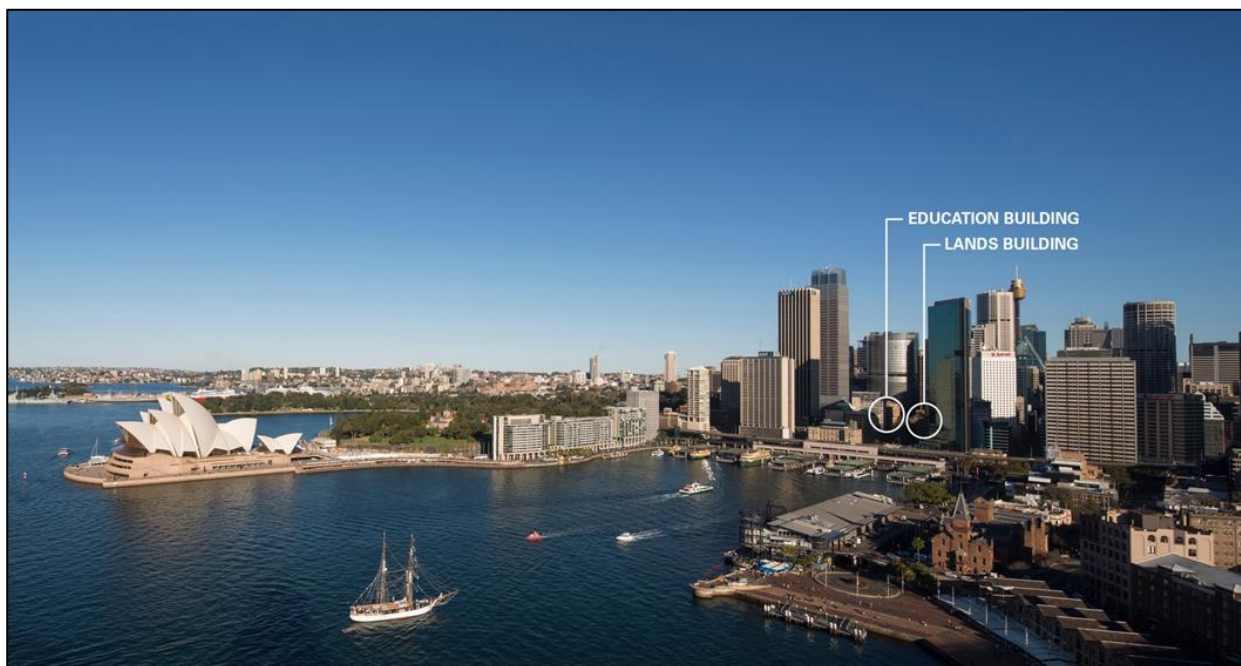
FIGURE 2 – THE SUBJECT SITE



Source: Johnson Pilton Walker 2014

As substantial buildings which occupy entire city blocks, both the Lands and Education Buildings have multiple entrances. The primary street frontage for both buildings is Bridge Street. However, the Education Building also has a pedestrian entrance off Farrer Place, and the Lands Building also has pedestrian entries on Gresham and Loftus Streets. The Education Building has a vehicle entry off Loftus Street whilst the Lands Building has access to a small loading dock on Gresham Street at the corner with Bent Street.

FIGURE 3 – SITE CONTEXT



2.2 EXISTING DEVELOPMENT

The Lands Building

The Lands Building was constructed in two stages between 1876 and 1893 and is listed on the Register of the National Estate, the State Heritage Register and as an item of local environmental heritage under the Sydney LEP 2012, as being one of the few major 19th Century buildings in Australia which remain intact in both fabric and setting.

The building contains 4 storeys (with very large floor to ceiling heights) and contains a domed roof-top feature and clock tower. The current built form provides four wings which surround a central vault with two central courtyards, and contains a loading dock which is accessed from Gresham Street at the western side of the property.

The Lands Building is currently used as office space by the NSW Department of Planning and Environment.

The Education Building

The Education Building was constructed in two stages between 1915 and 1930 and is listed on the Register of the National Estate, the State Heritage Register and as an item of local environmental heritage under the Sydney LEP 2012, for being a fine example of Edwardian institutional architecture.

The building contains seven storeys, with an attic on level 8 and caretaker's accommodation on levels 8 and 9. The built form provides a single rectangular building around a central light well, and has a loading dock and on-site parking for 12 cars accessible from Loftus Street. There is also a prominent Lift Motor Room above these, just to the south of the caretaker's accommodation. During the 1980-1990s the building underwent major renovations to bring the office accommodation up to modern standards and requirements. The Education Building is currently used as office space by the NSW Department of Education.

FIGURE 4 – EDUCATION BUILDING (LEFT) AND LANDS BUILDING (RIGHT) LOOKING SOUTH



FIGURE 5 – LANDS BUILDING LOOKING NORTH WEST



FIGURE 6 – EDUCATION BUILDING LOOKING NORTH



2.3 SURROUNDING LAND USES

The site is bound by Bridge Street in the North, Young Street in the East, Bent Street in the South and Gresham Street in the West. The range of surrounding land uses includes major tourism, retail, office, residential uses and public open space. The surrounding context is described as:

- To the **north**, Sydney Harbour, Circular Quay, Customs House, Macquarie Place and the AMP Precinct.
- To the **south**, Farrar Place, 1 Bligh Street office tower and a range of other commercial office buildings.
- To the **east**, the Museum of Sydney, Governor Phillip Tower, Government Macquarie Tower, the Botanic Gardens, Young Street Terraces and First Government House.
- To the **west**, a commercial office tower (56 Pitt Street) and a range of other commercial office buildings.

FIGURE 7 – SITE CONTEXT PLAN



Source: Johnson Pilton Walker 2014

FIGURE 8 – KEY ELEVATED BUILT FORM SURROUNDING THE SITE



FIGURE 9 – LANDS AND EDUCATION BUILDINGS WITHIN SURROUNDING CONTEXT



3 The Proposal

3.1 OVERVIEW

GPNSW is seeking approval for a staged development application in accordance with Section 83B of the EP&A Act 1979. This Stage 1 development application will seek to secure approval for a concept proposal only with subsequent detailed proposals (and physical works) to be subject to subsequent development applications.

The Stage 1 DA seeks approval for a concept proposal for the use of the Sandstone Precinct for tourist and visitor accommodation, complimentary ancillary uses, including (but not limited to) retail premises and a function centre and a building envelope (including defined by a maximum building height) that will facilitate the adaptive re-use, extensions and alterations to the existing buildings.

The concept proposal the subject of the Stage 1 DA includes the option for subterranean linkages between the two buildings (most likely underneath Loftus Street) as well as subterranean opportunities for the provision of hotel and associated ancillary services and support infrastructure, including but not limited to such as back of house facilities, loading, access and car parking.

The provision of support infrastructure such as back of house facilities and car parking that could be located under the existing buildings and road reserves. At this stage it is unclear whether future long term leaseholders will ultimately pursue this option at the Stage 2 DA phase; however this application explores the technical merits behind this option.

Any future development beneath the road reserves will be subject to a separate agreement with the City of Sydney as the relevant roads authority and landholder.

3.2 LAND USE

In accordance with the NSW Government's objective to adaptively re-use the Sandstone Precinct to address the immediate hotel accommodation shortage in Sydney, the applicant is seeking to secure approval for the use of both the Lands and Education Building as **'tourism and visitor accommodation'** as defined in SLEP 2012 below:

tourist and visitor accommodation means a building or place that provides temporary or short-term accommodation on a commercial basis, and includes any of the following:

- (a) *backpackers' accommodation,*
- (b) *bed and breakfast accommodation,*
- (c) *farm stay accommodation,*
- (d) *hotel or motel accommodation,*
- (e) *serviced apartments,*
- but does not include:*
- (f) *camping grounds, or*
- (g) *caravan parks, or*
- (h) *eco-tourist facilities.*

It is the proponent's express intention to utilise the buildings predominantly for *hotel or motel accommodation* which is defined as follows:

hotel or motel accommodation means a building or place (whether or not licensed premises under the Liquor Act 2007) that provides temporary or short-term accommodation on a commercial basis and that:

(a) comprises rooms or self-contained suites, and

(b) may provide meals to guests or the general public and facilities for the parking of guests' vehicles,

but does not include backpackers' accommodation, a boarding house, bed and breakfast accommodation or farm stay accommodation.

It is also proposed that the following ancillary uses will have the potential for inclusion as part of the proposed use being:

- **Serviced apartments** (but only as a minor proportion to the overall hotel use)
- **Retail Premises** (to allow for ancillary shops, food and drink premises including cafes and restaurants and roof top bars and the like) all of which would support the proposed hotel function.
- **Function Centre** (to support the opportunity if available to hold events, conferences and the like)
- **Other** – (Gym, pool, spa and other ancillary uses relating to the hotel functionality)

3.3 FLOOR SPACE

A maximum floor area for the development has not been established at this time and will be determined based on the approved building envelope for the site, including any subterranean floor space established. The total GFA of the site will be significantly below the maximum permitted under the SLEP 2012 of 14:1.

The existing gross floor area of the site is summarised as follows:

TABLE 2 – EXISTING GROSS FLOOR AREA

SITE	SITE AREA	CURRENT GFA (APPROX)	EXISTING FSR	MAXIMUM FSR AVAILABLE*
Lands Building	3,320m ²	10,076m ²	3.03:1	14:1
Education Building	2,762m ²	13,410m ²	4.85:1	14:1

*Based on hotel use excluding Design Excellence Bonus

3.4 BUILDING ENVELOPE

The building envelope proposed for the site seeks to optimise the development potential having regard to existing constraints in terms of heritage and planning controls.

3.4.1 EDUCATION BUILDING

This Stage 1 development application seeks concept approval for a building envelope for the Education Building that extends approximately 3 levels above the existing parapet to a height that is consistent with the top of the existing lift motor room. It is also proposed to establish a subterranean envelope covering the whole of the site for uses associated with the proposed tourist and visitor accommodation and associated uses, including potential back of house services, access, car parking and loading. The depth of the subterranean link is indicative at this stage, and will be defined during the Stage 2 DA process.

FIGURE 10 – INDICATIVE PROPOSED BUILDING ENVELOPE (LOOKING SOUTH)

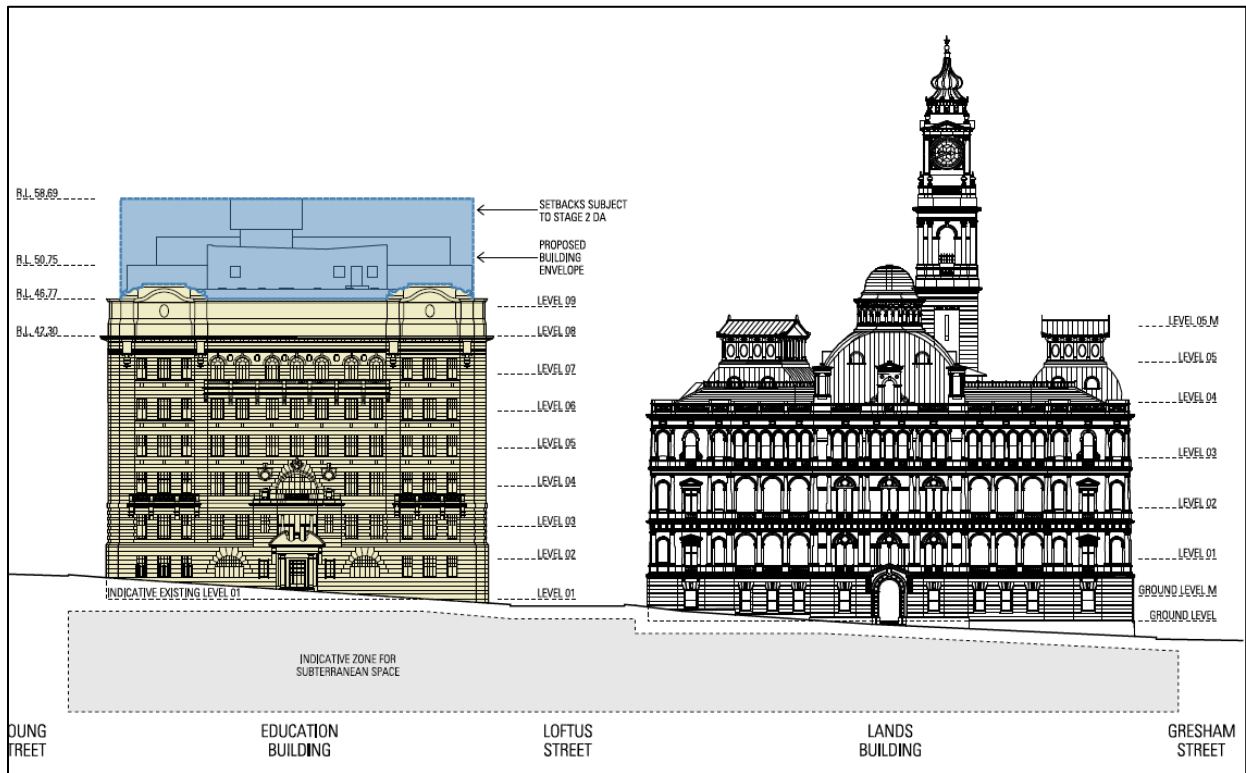


FIGURE 11 – INDICATIVE PROPOSED BUILDING ENVELOPE (LOOKING EAST)

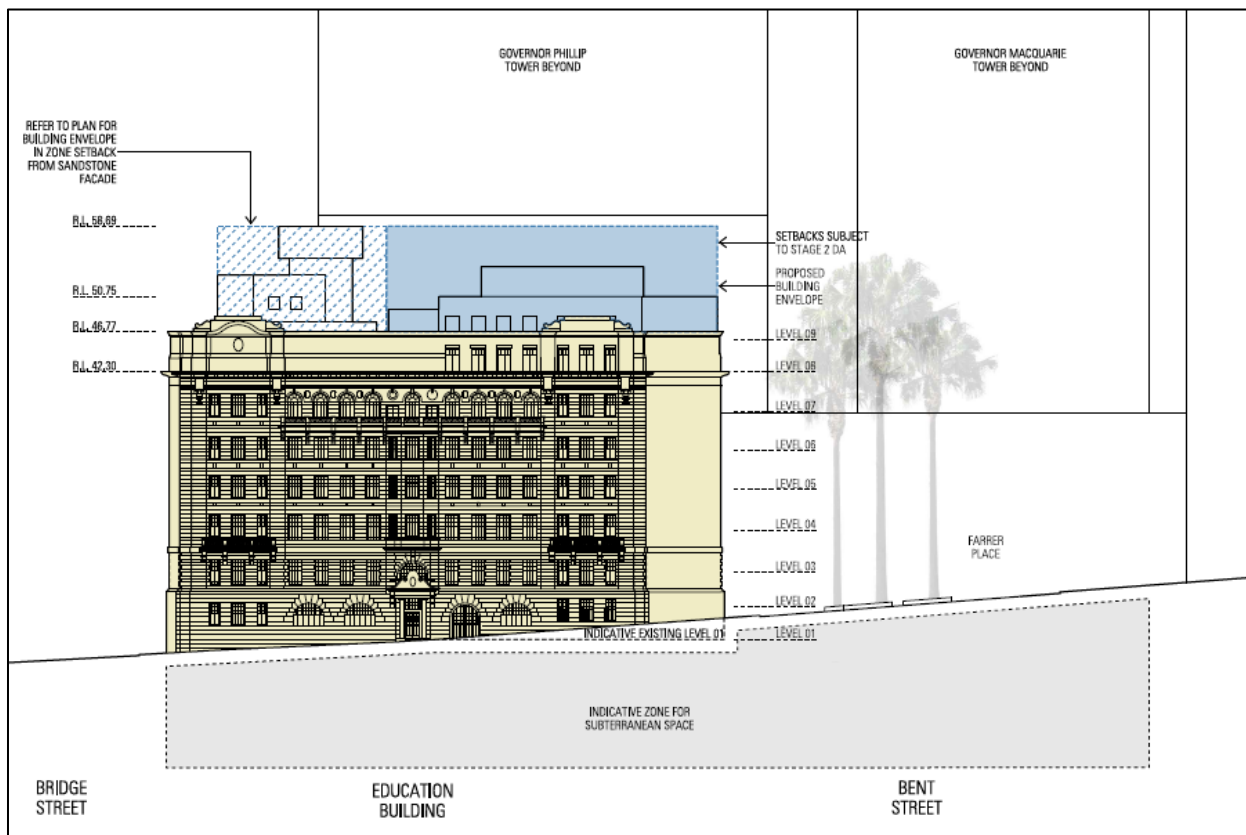


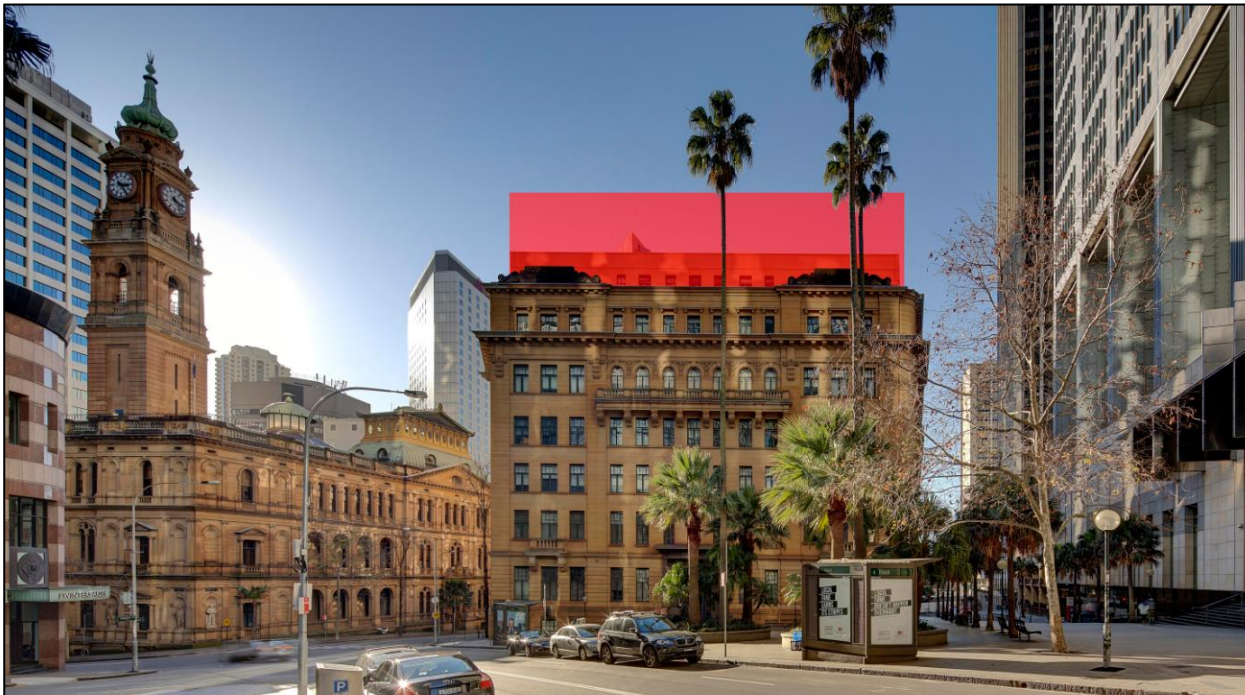
Figure 12 shows the existing envelope of the Education Building. Figure 13 shows the proposed building height envelope for the Education Building. This is further illustrated in the concept plans prepared by JPW Architects included at Appendix C.

The proposed subterranean envelope covering the whole of the site is shown in Figures 10, 11 and 14. The depth of the subterranean link is indicative at this stage, and will be defined during the Stage 2 DA process.

FIGURE 12 – EXISTING EDUCATION BUILDING



FIGURE 13 – PROPOSED BUILDING HEIGHT ENVELOPE OF EDUCATION BUILDING

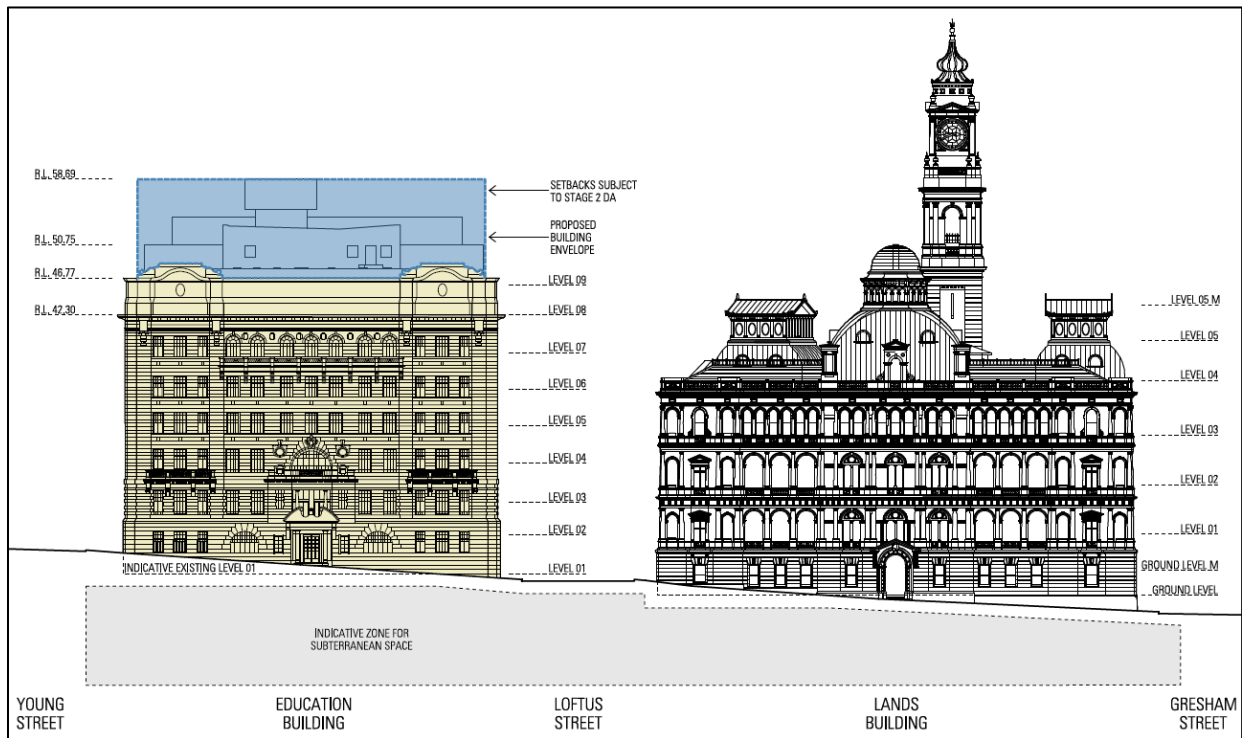


3.4.2 LANDS BUILDING

The Lands Building has a highly complex roofscape, incorporating towers, domes and other features. As a consequence, it is not proposed to establish a specific building envelope above this particular building. Nevertheless, it is proposed to explore opportunities for new building works to enhance the use of the roofscape for uses associated with the proposed tourist and visitor accommodation and associated uses, including roof top bars, restaurants, urban garden spaces, meeting rooms and high end space.

It is proposed to establish a subterranean building envelope to accommodate uses associated with the proposed tourist and visitor accommodation and associated uses, including ancillary uses, services, back of house activities, pedestrian connection with the Education Building and car parking, loading docks and access.

FIGURE 14 – INDICATIVE BUILDING HEIGHT ENVELOPE CONCEPT FOR LANDS BUILDING



The proposed subterranean envelope covering the whole of the site is not shown in Figure 14.

3.4.3 SUBTERRANEAN PUBLIC DOMAIN OPPORTUNITIES

To facilitate the proposed adaptive re-use of the Lands and Education Buildings, the proponent is seeking to explore opportunities within the public domain across the entire subject site to provide:

- pedestrian connection between the two buildings under Loftus Street; and
- The use of the sub terrain below Farrer Place and Gresham Street for the provision of hotel and associated ancillary services and support infrastructure, including but not limited to such as back of house facilities, loading, access and car parking.

In particular, the ability to create a pedestrian connection between the two buildings is considered to be a critical success factor in the proposed adaptive re-use of the buildings for hotel use. Similarly, the potential for uses associated with the proposed tourist and visitor accommodation and associated uses such as services and back of house of facilities to be isolated from the significant heritage fabric is also seen as fundamental to the preservation of the intrinsic significance of the heritage items.

4 Statutory Context

In accordance with the SEARs, the following statutory planning policies have been considered in the assessment of the proposal:

- *Environmental Planning and Assessment Act 1979*;
- *State Environmental Planning Policy (State and Regional Development) 2011*;
- *State Environmental Planning Policy (Infrastructure) 2007*;
- *State Environmental Planning Policy No 55 - Remediation of Land*;
- *Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005*; and
- *Sydney Local Environmental Planning Plan 2012*.

4.1 ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979

The *Environmental Planning and Assessment Act 1979* (the EP&A Act) created the assessment system for projects classified as State significant development (SSD). SSD is development considered to be of significance to the State.

Section 83B of the EP&A Act applies to staged development applications. A staged development application sets out concept proposals for the development of a site, with detailed proposals for separate parts of the site to be the subject of subsequent development applications. This SSDA represents the 'Stage 1' DA and seeks consent for a concept proposal for the use of the Sandstone Precinct for tourist and visitor accommodation, retail premises and a function centre and a building envelope (including defined by a maximum building height) that will facilitate the adaptive re-use, extensions and alterations to the existing buildings.

Table 3 provides an assessment of the proposal against the objects of the EP&A Act.

Table 4 provides an assessment of the proposal against the matters for consideration pursuant to Section 79C of the EP&A Act.

TABLE 3 – OBJECTS OF THE EP&A ACT 1979

OBJECT	COMMENT
5(a)(i) to encourage the proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment,	The proposal responds positively to this objective by promoting the adaptive and ongoing use of two significant heritage buildings. This will create a range of broader public benefits, including increased visitor expenditure in the NSW and Sydney economies, which will have flow on benefits to the economic welfare of the community.
5(a)(ii) to encourage the promotion and co-ordination of the orderly and economic use and development of land,	The proposed development involves the orderly redevelopment of the Sandstone Precinct for the provision of hotel accommodation. Given the strategic location, the proposal represents and promotes an appropriate economic use and development of the site.

OBJECT	COMMENT
5(a)(iii) to encourage the protection, provision and co-ordination of communication and utility services,	The proposal only involves the establishment of building envelopes and use, and therefore the provision of communication and utility services will be considered and assessed at Stage 2.
5(a)(iv) to encourage the provision of land for public purposes,	The proposal does not alter the provision of public land on and surrounding the development site. The proposal provides better street activation in the surrounding precinct which is a key objective of the B8 zone under Sydney LEP 2012. The adaptive re-use will also increase public access to these iconic heritage buildings.
5(a)(v) to encourage the provision and co-ordination of community services and facilities,	The proposal supports the provision of community services and facilities.
5(a)(vi) to encourage the protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats,	The proposal is located in an urban, metropolitan CBD context which doesn't provide for an abundance of native animals and plants. However, this EIS has assessed potential environmental impacts on the surrounding public domain (such as shadow impacts) and confirmed that these are considered reasonable.
5(a)(vii) to encourage ecologically sustainable development, and	The proposal seeks to adaptively re-use two significant heritage buildings in a central and highly accessible location. An ESD Report has been prepared with this application to set a framework for the future ESD principles to be implement at the detailed design stage.
5(a)(viii) to encourage the provision and maintenance of affordable housing, and	Not applicable to the proposal.
5(b) to promote the sharing of the responsibility for environmental planning between the different levels of government in the State, and	Ongoing consultation has been undertaken with regard to the proposed development, as outlined in Section 6.10 of this report. All Government agencies will also have the opportunity to provide submissions and feedback during the public exhibition process.
5(c) to provide increased opportunity for public involvement and participation in environmental planning and assessment.	The exhibition process will provide opportunity for public involvement, participation and comment.

TABLE 4 –SECTION 79C MATTERS FOR CONSIDERATION

MATTER	COMMENT
In determining a development application, a consent authority is to take into consideration such of the following matters as are of relevance to the development the subject of the development application: (a) the provisions of: (i) any environmental planning instrument, and	The proposal is consistent with the relevant environmental planning instruments (refer to Section 4).
(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Director-General has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and	There are no publicly exhibited draft instruments relevant to the proposal.
(iii) any development control plan, and	The proposal is consistent with the <i>Sydney Development Control Plan 2012</i> (refer to Section 5.5)
(iiia) any planning agreement that has been entered into under section 93F, or any draft planning agreement that a developer has offered to enter into under section 93F, and	No planning agreement or draft planning agreement has been entered into and therefore this matter for consideration is not relevant.
(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph), and	The proposal is consistent with the relevant regulations, namely Schedules 1 and 2 of the <i>Environmental Planning and Assessment Regulation 2000</i> which sets out the requirements and provisions of Environmental Impact Statements.
(v) any coastal zone management plan (within the meaning of the <i>Coastal Protection Act 1979</i>), that apply to the land to which the development application relates,	No coastal zone management plan applies to the proposal and therefore this matter for consideration is not relevant.
(b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,	This EIS assesses the impacts of the proposal and concludes that it will provide for a range of positive environmental, social and economic impacts as discussed throughout this report.
(c) the suitability of the site for the development,	The site is suitable for the development given the proposal implements conservation principles and sensitive adaptive re-use of both existing buildings.

MATTER	COMMENT
(d) any submissions made in accordance with this Act or the regulations,	The proposal is yet to be publically exhibited and therefore no public submissions have been made. These will be considered by the applicant following the public exhibition period.
(e) the public interest.	The proposal is in the public interest as it will provide conservation and sensitive adaptive re-use of a significant cultural precinct and provide a range of public benefits discussed in Section 5 of this report.

4.2 STATE ENVIRONMENTAL PLANNING POLICY (STATE AND REGIONAL DEVELOPMENT) 2011

State Environmental Planning Policy (State and Regional Development) 2011 (SEPP SRD) relevantly identifies various types of development as Stage Significant Development (SSD).

In particular, clause 8(1) of SEPP SRD provides that the development specified in Schedule 1 of the SEPP SRD is SSD. Clause 13(2) of Schedule 1 provides for the following:

13 Cultural, recreation and tourist facilities

(2) Development for other tourist related purposes (but not including any commercial premises, residential accommodation and serviced apartments whether separate or ancillary to the tourist related component) that:

(a) has a capital investment value of more than \$100 million, or

(b) has a capital investment value of more than \$10 million and is located in an environmentally sensitive area of State significance or a sensitive coastal location.

The proposal is development listed in Clause 13(2) of Schedule 1 as it is:

- Development for tourist related purposes;
- Located in an environmentally sensitive area of State Significance, which is defined to include buildings on the State Heritage Register; and
- Has a Capital Investment Value (CIV) of more than \$10 million.

A statement provided by a qualified Quantity Surveyor is provided at Appendix B and confirms the CIV is in excess of \$10 million.

Under Section 89D of the EP&A Act, the Minister for Planning and Infrastructure is the consent authority for SSD.

Section 78A(8A) of the EP&A Act requires that all development applications for SSD be accompanied by an EIS prepared by or on behalf of the applicant in the form prescribed by the regulations. Schedule 2 of the EP&A Regulation contemplates that environmental assessment requirements will be issued by the Secretary with respect to the proposed EIS. This EIS has been prepared to address the requirements of Schedule 2 of the EP&A Regulation and the SEARs.

4.3 STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE) 2007

State Environmental Planning Policy (Infrastructure) 2007 (SEPP Infrastructure) applies to the proposed development as the site is identified on Map 6 of the accompanying maps as 'Interim Rail Corridor – CBD Rail Link and CBD Metro' for 'CBD Rail Link (Zone B – Tunnel)' (refer to Figure 15).

Clause 88(3) of SEPP Infrastructure states that prior to determining a development application to which Clause 88 applies, the consent authority must give written notice of the application to the rail authority for the interim rail corridor in which the development is to be carried out (**the relevant rail authority**) within 7 days after the application is made.

Clause 88(4) states that concurrence from RailCorp will be required prior to determination of a development application to which clause 88 applies. Further, Clause 88(5) states that in determining whether to provide concurrence, Railcorp is to take into account the likely effect of the development on (a) the practicability and cost of carrying out rail expansion projects on the land in the future, and (b) without limiting paragraph (a), the structural integrity or safety of, or ability to operate, such a project, and (c) without limiting paragraph (a), the land acquisition costs and the costs of construction, operation or maintenance of such a project.

Clause 88 of SEPP Infrastructure relevantly applies to:

development that is:

...

(b) *in the area marked "Zone B" on a rail corridors map and:*

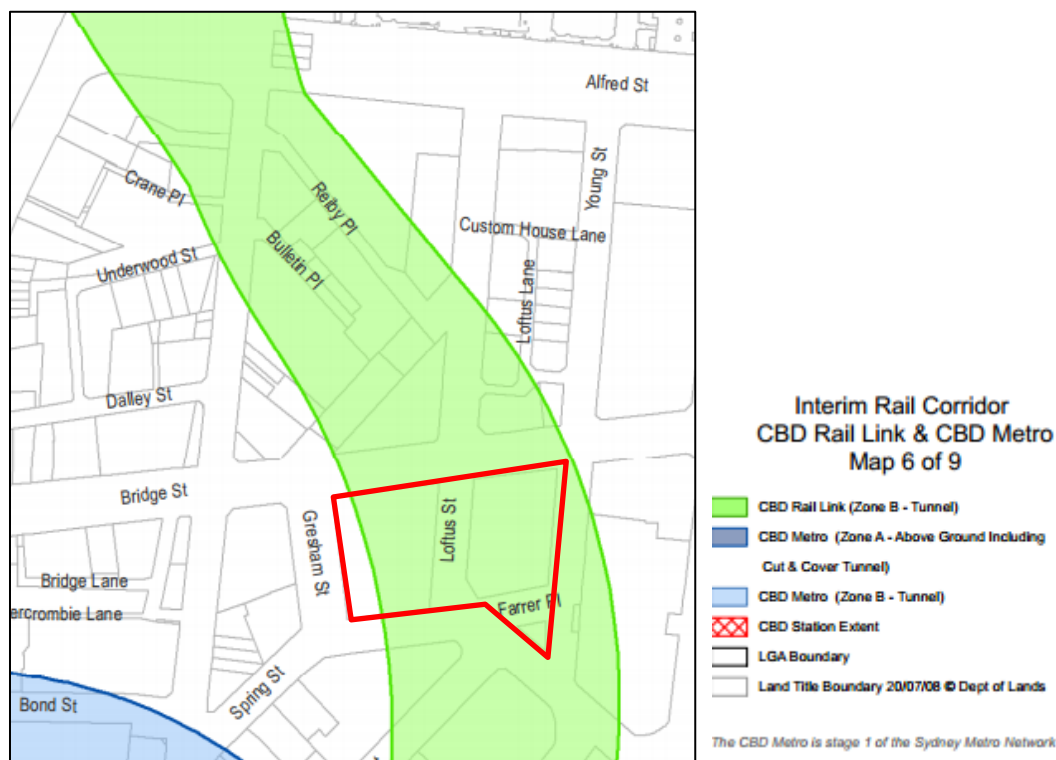
- (i) *involves the penetration of ground to a depth of at least 2m below ground level (existing), or*
- (ii) *has a capital investment value of more than \$200,000 and involves the erection of a structure that is 10 or more metres high or an increase in the height of a structure so that it is more than 10m.*

This Stage 1 development application will seek to secure approval for a concept proposal only with subsequent detailed proposals (and physical works, including any penetration of the ground or erection of structures) to be subject to subsequent development applications. Accordingly, it is not development of a kind to which clause 88 of SEPP Infrastructure applies.

Despite this, as discussed in Section 6 of this report, the applicant's structural engineer, TTW Engineers, have consulted with Transport for NSW in relation to the Interim Rail Corridor that is in close proximity to the site. A letter was sent to TNSW on 11 November 2014 which provided a package of information outlining the extent of excavation proposed (see Appendix F) and a letter of in-principle support is expected to be issued in late November 2014.

In summary, the potential excavation contemplated by the conceptual building envelope proposed in this application is significantly distanced/separated from the future rail tunnels (which are approximately 60 metres below the buildings). The applicant will continue to liaise with TNSW during the assessment of this application, and subsequently when any Stage 2 DA is being assessed.

FIGURE 15 – INTERIM RAIL CORRIDOR MAP (SOURCE: SEPP (INFRASTRUCTURE) 2007)



4.4 STATE ENVIRONMENT PLANNING POLICY NO. 55 – REMEDIATION OF LAND

State Environmental Planning Policy No.55 Remediation of Land (SEPP 55) requires the consent authority to take into consideration contamination and remediation of land in determining development applications. The authority must be satisfied that land that is contaminated is suitable for the proposed use or will be suitable following remediation of the land.

The site is not known to be affected by any contamination. A preliminary contamination assessment has been undertaken (see Appendix L). This provides that based on a historical use of the site, with the structures remaining generally unchanged since their original construction, the potential for significant contamination is relatively low. A site inspection was undertaken indicated that housekeeping at the site was generally good and the current site activities were unlikely to represent a source of significant environmental contamination. The preliminary assessment identified that there is no visible evidence to indicate the presence of underground storage tanks or aboveground storage tanks.

4.5 SYDNEY REGIONAL ENVIRONMENTAL PLAN (SYDNEY HARBOUR CATCHMENT) 2005

Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005 (SREP SHC) provides planning principles for development within the Sydney Harbour catchment. The Sandstone Precinct falls within the Sydney Harbour Catchment area. Planning principles for land within the Sydney Harbour Catchment, of relevance to the proposed development of the site, include:

- Decisions with respect to the development of land are to take account of the cumulative environmental impact of development within the catchment.
- The heritage significance of particular heritage items in and around Sydney Harbour should be recognised and conserved.
- Significant fabric, settings, relics and views associated with the heritage significance of heritage items should be conserved.

The proposal is consistent with the relevant Planning Principals of the *Sydney Harbour Catchment SEPP* and will not have any significant adverse impact on the Sydney Harbour Catchment. The Stage 1 proposal recognises and aids to conserve the heritage value, fabric, setting and views associated with the Education and Lands Buildings. As stated in the Statement of Heritage Impact prepared by Graham Brooks and Associates, the proposal 'is highly likely to have a very positive outcome on the long term continuity and evolution of the heritage significance, architectural character and public accessibility of these two fine and distinctive heritage buildings and their surrounding public domain'.

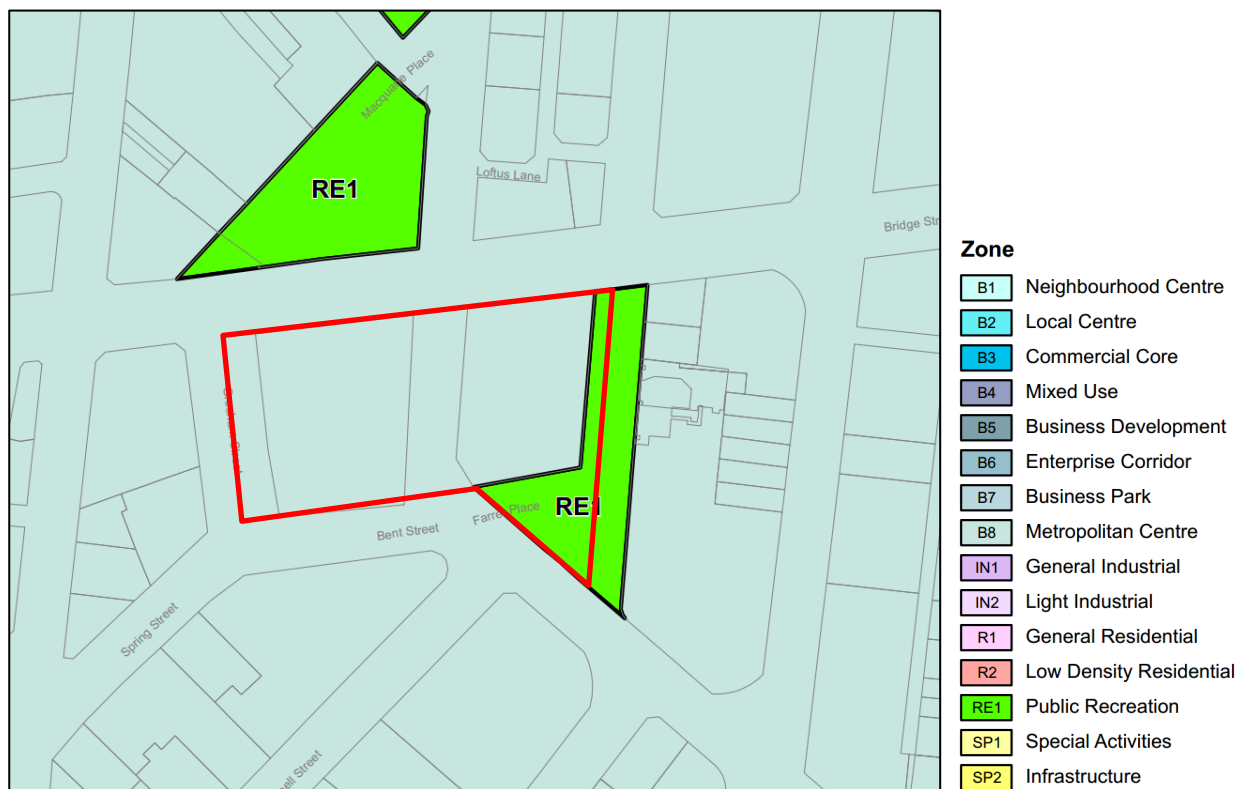
4.6 SYDNEY LOCAL ENVIRONMENTAL PLAN 2012

Sydney Local Environmental Plan 2012 (SLEP) is the principle local environmental planning instrument applying to the site.

4.6.1 LAND USE PERMISSIBILITY

The subject site, with the exception of Farrer Place, is zoned 'B8 Metropolitan Centre' under the SLEP. 'Tourist and Visitor Accommodation', Retail Premises and Function Centre are all permissible uses with consent in this zone, and one of the key zone objectives is to promote the role of tourism within the Sydney CBD that contributes to the global economy.

FIGURE 16 – LAND ZONING MAP – SHEET 014



Farrer Place is zoned RE1 – Public Recreation under the SLEP. Clause 5.3A of the SLEP is relevant to the potential use of the sub-terrain areas of Farrer Place for back of house servicing and car parking as follows:

5.3A Development below ground level in Zone RE1

(1) This clause applies to development:

- (a) that is entirely below ground level (existing) on land in Zone RE1 Public Recreation (the **Public Recreation Zone**), and
- (b) that is for a purpose that may be carried out in a zone that adjoins the Public Recreation Zone.

- (2) Despite any other provision of this Plan relating to the purposes for which development may be carried out, development consent may be granted to development to which this clause applies if the consent authority is satisfied that:
- (a) the carrying out of the development is desirable due to compatible land use planning, infrastructure capacity and other planning principles relating to the efficient and timely development of land, and
 - (b) the development will not have any significant adverse effects on the environment and will not prevent any land within the Public Recreation Zone being used for recreational purposes.

Based on the provisions of Clause 5.3A of the SLEP, the proposed uses within the RE1 zone are permissible with consent.

4.6.2 HERITAGE ITEMS

Both the Lands Building and Education Building and Farrer Place are identified on the Heritage Map forming part of SLEP. Schedule 5 of SLEP identifies both of the Lands Building and the Education Building as being of 'State' significance and the palm trees in Farrer Place as being of local heritage significance.

The subject site is surrounded by a range of local and State listed heritage items (refer to Figure 17 below).

FIGURE 17 – HERITAGE MAP – SHEET 014



4.6.3 BUILDING HEIGHT

Clause 4.3 of SLEP prescribes height limits for the subject site. The maximum height of buildings permitted on site is limited to "the height of the building on the land as at the commencement of this Plan" (i.e. the current height of the assets) (refer to Figure 19 – Height of Buildings Map).

Under SLEP 'building height' is defined as:

Building height (or height of building) means the vertical distance between ground level (existing) and the highest point of the building, including plant and lift overruns, but excluding communication devices, antennae, satellite dishes, masts, flagpoles, chimneys, flues and the like.

The existing height of the Education Building is RL 58.69 when measured from the existing lift motor room (refer to Figure 18). The proposed concept building height for the Education Building is RL 58.69, representing no additional height over the existing 'building height' and is accordingly consistent with clause 4.3 of SLEP.

FIGURE 18 – EXISTING HEIGHT OF EDUCATION BUILDING

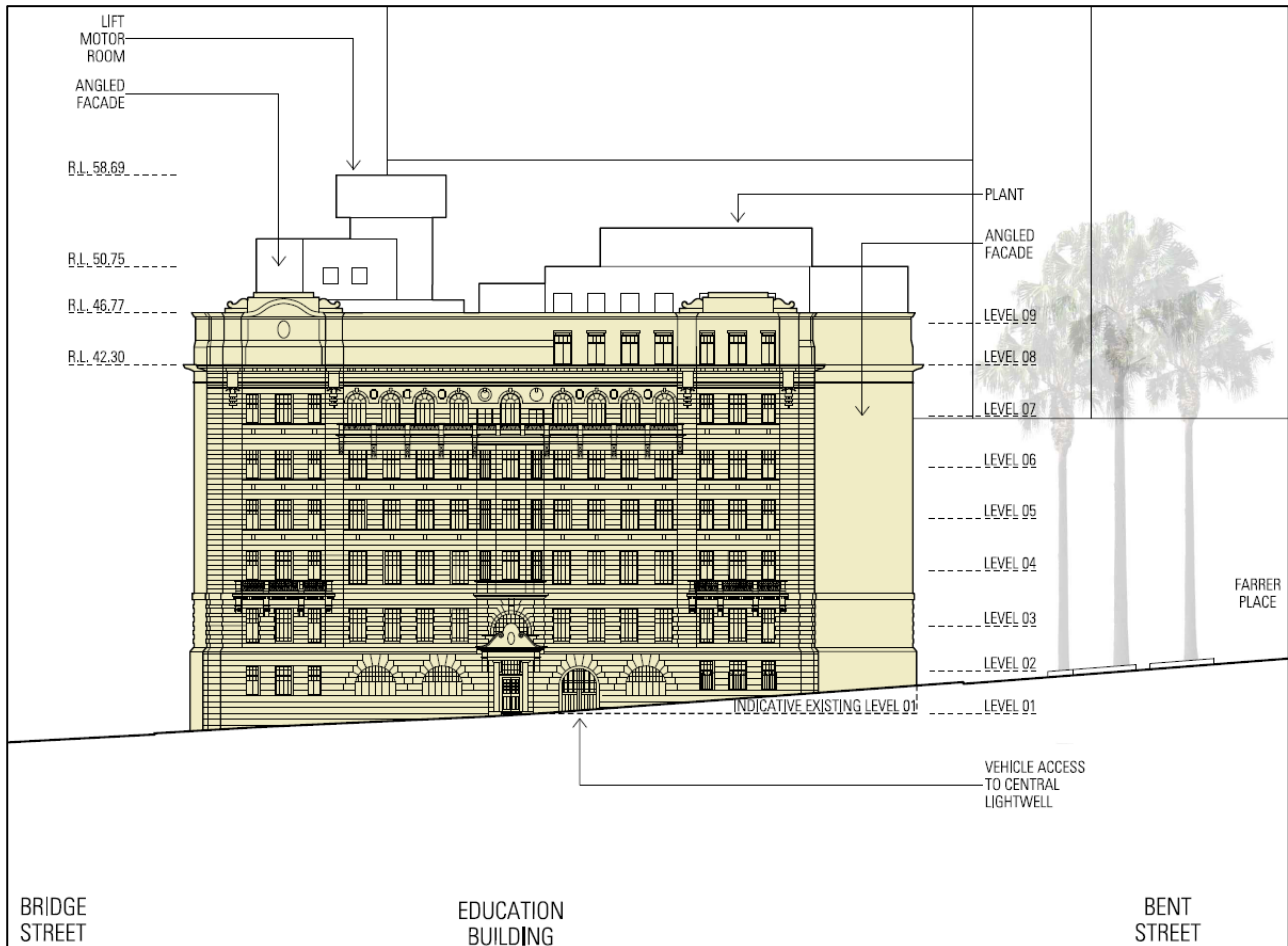
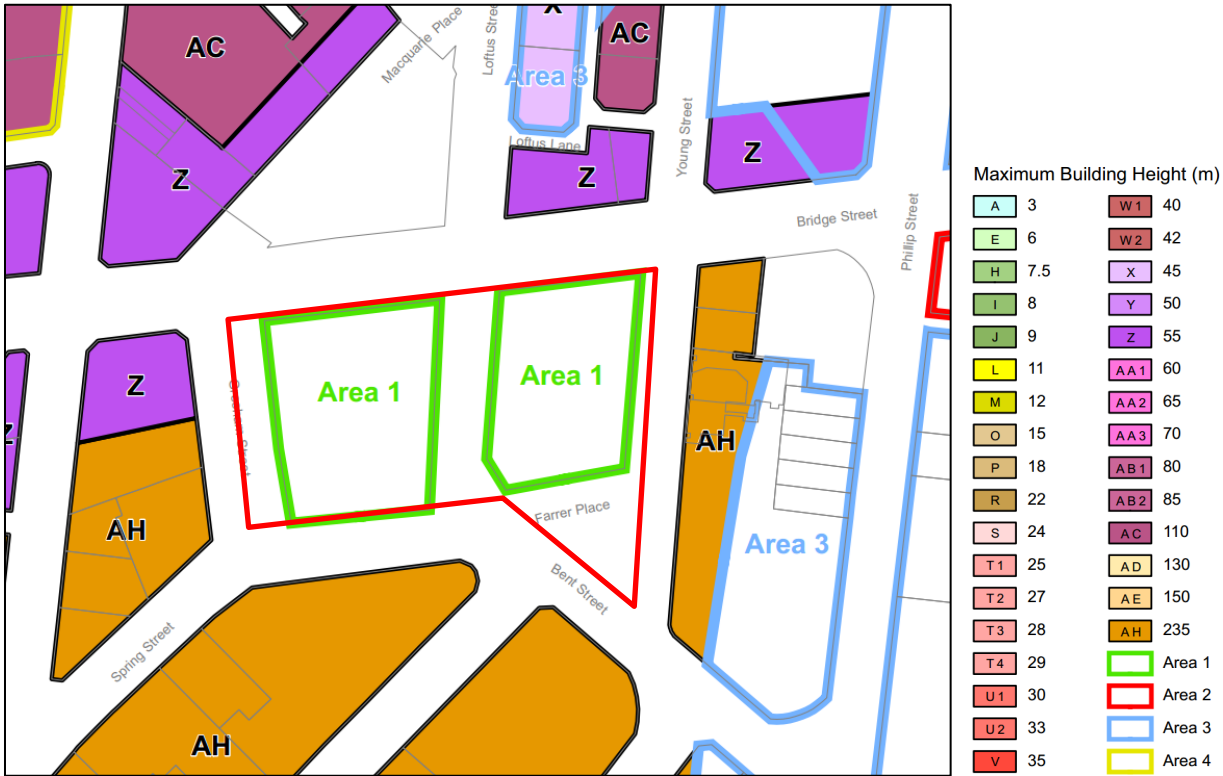


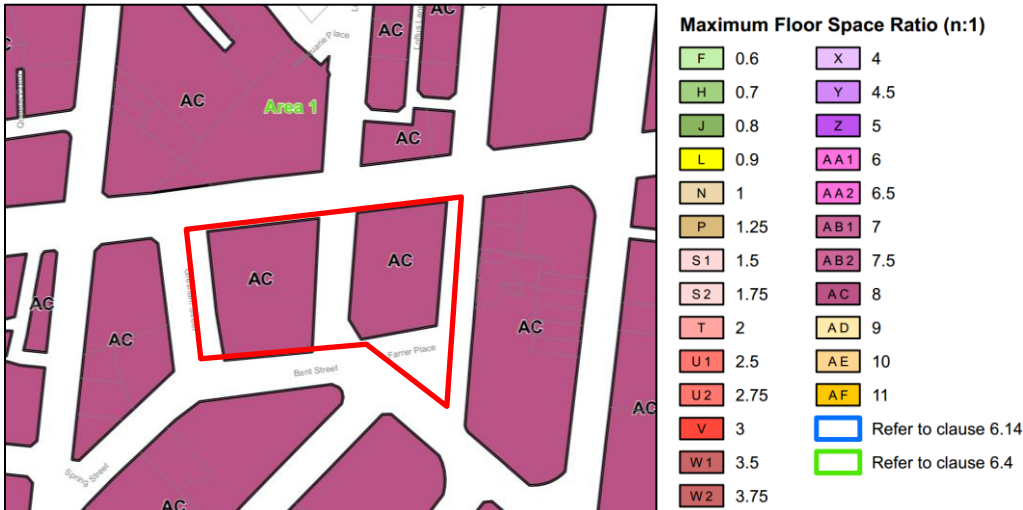
FIGURE 19 – HEIGHT OF BUILDINGS MAP – SHEET 014



4.6.4 FLOOR SPACE RATIO

Clause 4.4 of SLEP prescribes a FSR of 8:1 across both sites (refer to Figure 20) with the potential for an additional 6:1 as ‘accommodation floor space’ pursuant to Clause 6.4(a). This equates to a total FSR of 14:1. The existing FSR of 3.03:1 for the Lands Building and 4.85:1 for the Education Building represents a significant underutilisation of floor space when compared to the prescribed floor space on site.

FIGURE 20 – FLOOR SPACE RATIO MAP – SHEET 014



4.7 DESIGN EXCELLENCE

Sydney LEP 2012 has a key objective to deliver the highest standard of architectural, urban and landscape design, and applies to the erection of a new building or external alterations to an existing

building. Clause 6.21 (4) of the LEP clarifies that in considering whether a development exhibits design excellence, the consent authority must have regard to the following matters:

- (a) whether a high standard of architectural design, materials and detailing appropriate to the building type and location will be achieved,*
- (b) whether the form and external appearance of the proposed development will improve the quality and amenity of the public domain,*
- (c) whether the proposed development detrimentally impacts on view corridors,*
- (d) how the proposed development addresses the following matters:*
 - (i) the suitability of the land for development,*
 - (ii) the existing and proposed uses and use mix,*
 - (iii) any heritage issues and streetscape constraints,*
 - (iv) the location of any tower proposed, having regard to the need to achieve an acceptable relationship with other towers (existing or proposed) on the same site or on neighbouring sites in terms of separation, setbacks, amenity and urban form,*
 - (v) the bulk, massing and modulation of buildings,*
 - (vi) street frontage heights,*
 - (vii) environmental impacts, such as sustainable design, overshadowing and solar access, visual and acoustic privacy, noise, wind and reflectivity,*
 - (viii) the achievement of the principles of ecologically sustainable development,*
 - (ix) pedestrian, cycle, vehicular and service access and circulation requirements, including the permeability of any pedestrian network,*
 - (x) the impact on, and any proposed improvements to, the public domain,*
 - (xi) the impact on any special character area,*
 - (xii) achieving appropriate interfaces at ground level between the building and the public domain,*
 - (xiii) excellence and integration of landscape design.*

This Stage 1 DA responds positively to a number of the above criteria, as described below:

- This application provides a framework for a high standard of future architectural design, materials and detailing, with the Statement of Heritage Impact (SHI) and Conservation Management Plans (CMPs) providing relevant guidance on this.
- The proposal does not detrimentally impact on view corridors as demonstrated in the view analysis report by JPW Architects.
- The proposal is supported on heritage grounds as discussed in Section 6.5 of this report and in the Statement of Heritage Impact.
- The environmental impacts of the proposal, including shadow impacts on the surrounding precinct are reasonable, as discussed in Section 6 of this report.
- The proposal provides a range of positive ESD benefits and provides a framework for their future implementation subject to later Stage 2 DAs.

On this basis, the proposed Stage 1 DA is consistent with the key elements of achieving 'design excellence'.

Clause 6.21 (5) of the LEP provides criteria for when design competitions may be required to achieve design excellence based on a range of items such as building height, site area and capital investment value of a project. However, clause 6.21 (6) of SLEP 2012 provides that a competitive design is not required if the consent authority is satisfied that such a process would be unreasonable or unnecessary:

A competitive design process is not required under subclause (5) if the consent authority is satisfied that such a process would be unreasonable or unnecessary in the circumstances or that the development:

- (a) involves only alterations or additions to an existing building, and*
- (b) does not significantly increase the height or gross floor area of the building, and*
- (c) does not have significant adverse impacts on adjoining buildings and the public domain, and*
- (d) does not significantly alter any aspect of the building when viewed from public places.*

The current project is not seeking approval for detailed design at this stage, however it is expected that a competitive design process would be unreasonable and unnecessary for any subsequent Stage 2 development application the following reasons:

- The Stage 2 proposal may involve an up to a three storey addition to the Education Building which is consistent with the existing maximum height of the building, and does not rely on achieving any additional height as part of the competition process.
- The Stage 2 proposal would necessarily be significantly under the FSR potential of the site and would not relying on any additional floor space as part of a competition process.
- This EIS demonstrates that no unreasonable impacts from the additional height will affect adjoining buildings and the public domain.
- This EIS demonstrates that the Stage 2 proposal will not have any unreasonable impacts on views from public spaces as demonstrated in the visual impact analysis which accompanies this EIS.

5 Strategic and Policy Context

In accordance with the SEARs, the following strategic planning policies and guidelines have been considered in the assessment of the proposal:

- *NSW 2021*;
- *Draft Metropolitan Strategy for Sydney to 2031*;
- *Sydney City Draft Sub-Regional Strategy*;
- *Metropolitan Plan for Sydney 2036*;
- *Sydney 2030 Strategy*
- *Sydney Development Control Plan 2012*;
- *Planning Guidelines for Walking & Cycling*;
- *Sydney City Centre Access Strategy*;
- *Sydney's Cycling Future*; and
- *Sydney's Walking Future*.

5.1 NSW 2021 – A PLAN TO MAKE NSW NUMBER ONE

'*NSW 2021 A Plan to Make NSW Number One*' is the State Government's 10 year plan to guide policy and decision making across the State. One of the underlying, central themes of the strategy is to improve the performance of the NSW economy, with a 'priority action' being:

"Increase tourism in NSW with double the visitor expenditure by 2020"

The *Visitor Economy Industry Action Plan* (December 2012) is a key initiative from the NSW 2021 Strategy that identifies specific actions for the government to implement over the next few years. Amongst other initiatives, the following actions are recommended to the Government:

*"Introduce specific incentives and remove unnecessary regulatory/approval procedures and requirements to **encourage adaptive re-use and preservation of heritage buildings**"*

*"Investigate options to provide incentives, such as planning bonuses and tax offsets for tourism investment in new projects, as well as **refurbishments and improvements that enhance the visitor experience and quality of existing product offerings**"*

*"Increase the use of planning incentives and land use controls to **stimulate tourism development, especially for visitor accommodation and attraction investment**"*
(our emphasis)

In response to the above actions, GPNSW is seeking approval for the use of the Sandstone Precinct for tourism and visitor accommodation uses, to provide the private market with confidence and certainty that this use is specifically being promoted by the State.

5.2 DRAFT METROPOLITAN STRATEGY FOR SYDNEY 2031

The proposal is consistent with the *Draft Metropolitan Plan for Sydney 2031* as it will:

- Support the utilisation of the site for tourist and visitor accommodation and thus strengthen and support the service sector.

- Provide employment opportunities during the construction and operation of the proposed development.
- Contribute to the strengthening of 'Global Sydney' as a centre for economic, educational, medical, creative and cultural activity.
- Provide tourist and visitor accommodation in close proximity to Sydney's prime tourist precinct.
- Contribute to the enhancement of Sydney's day and night economy.

5.3 SYDNEY CITY DRAFT SUB-REGIONAL STRATEGY

The proposal is consistent with the *Sydney City Draft Sub-Regional Strategy* as it will:

- Contribute to providing sufficient visitor accommodation capacity for the projected increase in visitor numbers.
- Contribute to the increased supply of high quality function space in Sydney City.
- Support the promotion of NSW tourism.
- Incorporates sensitive design measures that recognises and enhances Sydney's cultural significance.

5.4 METROPOLITAN PLAN FOR SYDNEY 2036

The proposal is consistent with the *Metropolitan Plan for Sydney 2036* as it will:

- Contribute to strengthening Sydney's economic competitiveness by providing high quality tourist and visitor accommodation within a heritage context high in cultural value.
- Ensure adequate capacity for new visitor accommodation and enhancement of tourist opportunities in Sydney CBD.
- Contribute to making Sydney further connected and compact by increasing the hotel capacity within Sydney CBD.

5.5 SYDNEY 2030 STRATEGY

The Sydney 2030 Strategy is a strategic vision document which responds to the community's ideas for creating a better Sydney.

The 2030 vision focuses on 10 strategic directions, which include:

A globally competitive and innovative City

A leading environmental performer

Integrated transport for a connected City

A City for pedestrians and cyclists

A lively, engaging City Centre

Vibrant local communities and economies

A cultural and creative City

Housing for a diverse population

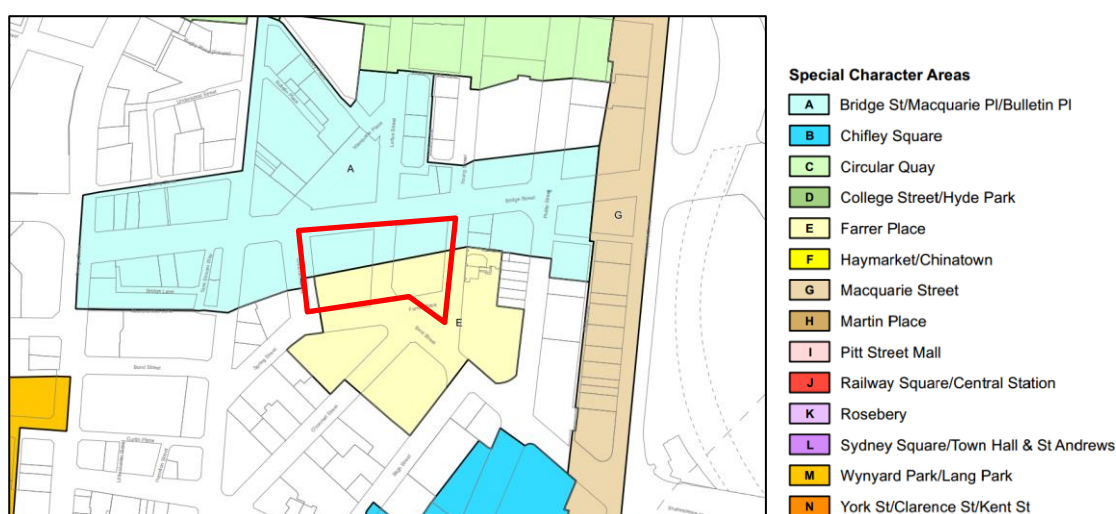
The proposal responds positively to a number of these objectives (and the targets which embed these) by providing high quality tourist and visitor accommodation space in a highly accessible location in a sustainable, adaptive re-use manner. The proposal importantly provides the opportunity for an additional 2,000+ jobs which provides a big contribution to their target of an additional 97,000 jobs by 2030.

5.6 SYDNEY DEVELOPMENT CONTROL PLAN 2012

5.6.1 SPECIAL CHARACTER AREA CONTROLS

The subject site sits within two special character precincts within Central Sydney. Specific development principles have been established to inform development and are listed below.

FIGURE 21 – SPECIAL CHARACTER AREA PRECINCT CONTROL AREAS – SHEET 014



Bridge Street/Macquarie Place/Bulletin Place Special Character Area

TABLE 5 – SYDNEY DCP 2012 SPECIAL CHARACTER RESPONSE

PRINCIPLE	COMMENT
(a) <i>Development must achieve and satisfy the outcomes expressed in the character statement and supporting principles.</i>	The proposal is consistent with the character statement, particularly the requirement to maintain the views and vistas of predominate sandstone buildings (refer to View Impact Assessment at Appendix H). See commentary below regarding satisfaction of principles.
(b) <i>Recognise and enhance Bridge Street as one of Sydney's pre-eminent urban spaces and as the locality of heritage items which have housed activities of State and National significance.</i>	The proposal provides a unique opportunity to adaptively re-use iconic heritage items which has a range of positive impacts on the surrounding precinct, including enhanced street activation and pedestrian movement in the northern end of the Sydney CBD.
(c) <i>Protect and extend morning sun access to Macquarie Place, Bridge Street and First Government House</i>	As shown in the Shadow Impact Analysis at Appendix I, the proposed development does not significantly alter

PRINCIPLE	COMMENT
<i>Place.</i>	the morning sun access to Macquarie Place, Bridge Street and First Government House.
<i>(d) Conserve the existing significant laneways in the area and encourage active uses, where compatible with their significance.</i>	The proposed development does not alter the existing pathways in the locality.
<i>(e) Maintain and reinforce existing important public spaces, intersections and corners, in particular those crowned by significant buildings, such as the Lands Department and the Chief Secretary's Department Building.</i>	The proposal will enhance the surrounding public spaces by providing increased street activation and revitalisation of the northern end of the Sydney CBD.
<i>(f) Maintain and enhance existing views to the water, and also significant vistas to the Lands Department Building from Loftus Street, Macquarie Place and Bridge Street itself, in addition to the vista along Bridge Street to the Conservatorium of Music.</i>	As detailed in the View Impact Analysis at Appendix H, the significant vistas of the Lands Building will not be significantly interrupted from the proposed building envelope when viewed from Loftus Street, Bridge Street and Macquarie Place. The view corridor along Bridge Street will not be altered when viewed from street level.
<i>(g) Maintain and reinforce the cohesive and rare streetscape character of Bridge Street and Macquarie Place by requiring new buildings to be built to the street alignment and with building heights that reinforce the existing predominant street frontage height.</i>	The proposed building envelope is consistent with the current 'building height' on site.
<i>(h) Protect vistas that terminate at significant heritage buildings, including nineteenth and twentieth century public and commercial buildings.</i>	The proposed building envelope will not significantly impact on the vistas that terminate on the subject buildings or surrounding heritage buildings (refer to Appendix H).

Farrer Place Special Character Area

TABLE 6 – FARRAR PLACE SPECIAL CHARACTER AREA RESPONSE

PRINCIPLE	COMMENT
<i>(a) Development must achieve and satisfy the outcomes expressed in the character statement and supporting principles.</i>	The proposal is consistent with the character statement, particularly the requirement to maintain the views to the Lands Building (refer to View Impact Assessment at Appendix H). See commentary below regarding satisfaction of principles.
<i>(b) Reinforce the urban character and sense of enclosure of Farrer Place by requiring new buildings to:</i> <i>i. be built to the street alignment; and</i> <i>ii. have adequate setbacks above the street alignment.</i>	The existing buildings are built to the street alignment and the proposed building envelope respects the built form characteristics of both buildings.

PRINCIPLE	COMMENT
(c) <i>Restrain the building bulk and scale of new development, particularly to the east and south of the place.</i>	The proposed building height envelope is relatively minor in scale when compared to surrounding buildings and only involves the addition of building mass to a height already established on site by the lift motor room. The subterranean building envelope will not impact on the bulk and scale of the buildings.
(d) <i>Protect and extend winter sun access to the place, particularly during lunchtime.</i>	The proposal provides some additional shadow impacts to the stairs and ground plane adjacent to 1 Bligh Street during the midday period in mid-winter. Refer to Section 6.3 for further discussion.
(e) <i>Interpret the history of the place and its evolution in the design of new buildings and elements within the public domain and give it its own sense of place.</i>	The proposed development will implement sensitive adaptive re-use principles in order to retain the culturally significant fabric of the buildings and thus provide a continuation of the locality's sense of place. The proposal will provide for better public access to these important heritage assets compared to the current office use.
(f) <i>Improve, enhance and activate the public domain within the place.</i>	The proposed hotel use may enhance and activate the public domain by enabling permeable activity between the public domain and building.
(g) <i>Maintain and enhance existing views to Sydney Harbour and the Harbour Bridge to the north and vistas to the tower of the Lands Department building to the west.</i>	As detailed in the View Impact Analysis at Appendix I, the proposed building envelope will not alter the existing views to Sydney Harbour and the Harbour Bridge or the vistas to the Lands Building when viewed from Farrer Place.

5.7 PLANNING GUIDELINES OR WALKING AND CYCLING

The proposal is consistent with the *Planning Guidelines for Walking and Cycling* in that the location is highly accessible to key tourist destinations and will promote tourists and visitors to walk as opposed to reliance on vehicular transport. As detailed in the Traffic Impact Assessment at Appendix J, the removal of the bus layover areas on Loftus Street will improve accessibility for hotel patrons travelling between the Sandstone Precinct and Circular Quay transport interchange.

5.8 SYDNEY CITY CENTRE ACCESS STRATEGY

The proposal is consistent with the *Sydney City Centre Access Strategy* in that it contributes to providing a hotel accommodation use within walking/cycling distance from services, facilities and key tourist destinations.

5.9 SYDNEY'S CYCLING FUTURE

The Sandstone Precinct is located within close proximity to the proposed cycleway on Pitt Street and as such will provide the users of the development the opportunity to cycle.

5.10 SYDNEYS WALKING FUTURE

The proposal contributes to providing a hotel accommodation use within walking distance from services, facilities and key tourist destinations. The introduction of the light rail project on George Street will provide increased opportunities for an improved pedestrian environment. Further, as detailed in the Traffic Impact Assessment at Appendix J, the removal of the bus layover areas on Loftus Street will improve accessibility for hotel patrons travelling between the Sandstone Precinct and Circular Quay transport interchange.

6 Key Assessment Issues

6.1 OVERVIEW

The SEARs clarify that the following environmental assessment matters need to be addressed within the EIS:

- Compliance with relevant EPIs, Policies and Guidelines;
- Built form and design;
- Amenity;
- Heritage;
- Subterranean works ;
- Traffic, parking and access;
- Infrastructure impacts – Interim Rail Corridor;
- Ecologically Sustainable Development; and
- Consultation.

Each of these key assessment matters is discussed under the sub-headings below.

6.2 COMPLIANCE WITH RELEVANT EPI'S, POLICIES AND GUIDELINES

Section 5 of this EIS provides an overview of the project's compliance with the relevant Environmental Planning Instruments, policies and guidelines. This overview establishes that the proposed development concept the subject of this Stage 1 development application is consistent with a wide range of state, regional and local planning instruments, policies and guidelines.

In summary, the proposal:

- Responds to a number of key state government tourism initiatives, in particular the objective to double the visitor expenditure of NSW by 2020, and to address the immediate accommodation shortage in Sydney.
- Is specifically identified as a class of development in the SEPP (State and Regional Development) 2011 that is of 'state significance' because of its tourism input to the NSW economy.
- Is a permissible use in the 'B8 Metropolitan Zone' of SLEP 2012 and responds positively to the zone objectives by providing tourism uses that will strengthen the global economy of Sydney in close proximity to excellent public transport.
- Complies with the key development standards under SLEP 2012 including the maximum building height and floor space ratio.
- Is consistent with the Special Character Area provisions of Sydney DCP 2012.

Therefore, the proposal provides a framework for a Stage 2 development application which will also be consistent with the underlying strategic planning policy for the site.

6.3 BUILT FORM AND URBAN DESIGN

The SEARs state that the EIS shall:

Address the height (including plant), bulk, scale and setbacks of the proposal within the context of the locality, the heritage significance of the site and the Sydney LEP 2012;

Undertake a view analysis including photomontages and perspectives of each elevation and 3 dimensional images of the proposed vertical additions to the Education Building, addressing:

- *Key elements and views of the development from key locations;*
- *Key views, vistas and view corridors from the public domain and residential buildings that may be impacted as determined by the view analysis*
- *Planning principles for impacts on private and public domain views; and*
- *Potential design considerations aimed at mitigating any impacts.*

The applicant is seeking approval for a building envelope as opposed to detailed design or any physical works at this stage. The intent is to allow interested parties in the Sandstone Precinct to have certainty about key development parameters, without resolving the detailed internal and external design. In particular, the Stage 1 envelope the conditions imposed on any approval granted to this proposal will set parameters for the future design, and will seek to positively respond and contribute to the site's unique heritage and surrounding local context. This will be essential in achieving the best outcome on the site.

Visual Impacts

In response to the above SEARs, JPW Architects have prepared architectural plans that provide an indication of the conceptual built form arrangement, as well as a view impact analysis to evaluate the proposed vertical additions to the Education Building. This demonstrates the following:

- The building height of the Land's Building is unchanged by the proposal, and will therefore not have any additional visual impact on the surrounding context.
- A building envelope for a vertical addition to the Education Building is proposed, with the height of the addition consistent with the top RL of the lift motor room or existing highest point of the building. This is consistent with the controls contained in Clause 4.3 (2A) of SLEP.
- A subterranean building envelope is proposed but, as this is subterranean it will not have any visual impacts.
- The proposed building envelope for a vertical addition to the Education Building has been located and scaled to be subservient to the architectural expression of the existing building, is distinguishable from the existing volume and expression of that building, and is setback appropriately from key street interfaces, and respects the notable roof features and architectural detailing of the Lands Building.
- As discussed in Section 6.5, Graham Brooks and Associates consider that this proposed building envelope for a vertical addition responds positively to the character and heritage significance of the existing buildings and the significance of the Bridge Street/Macquarie Place/Bulletin Place Special Character Area.
- The visual impact analysis by JPW Architects indicates that there are a variety of viewpoints from the public domain that will perceive the proposed building envelope for a vertical addition to the Education Building. As the proposal is set back generously from Bridge Street, the visual impact along this street according to JPW is "minimal within the Bridge Street streetscape, and the prominence of the north facing sandstone facades to the street is not challenged". Therefore, the setback of the proposed building mass from Bridge Street is an important design initiative which reduces the visual impact at this interface.

FIGURE 22 – VISUAL IMPACTS IN BRIDGE STREET (SOURCE: JPW ARCHITECTS)



PICTURE 1 – EXISTING



PICTURE 2 – PROPOSED



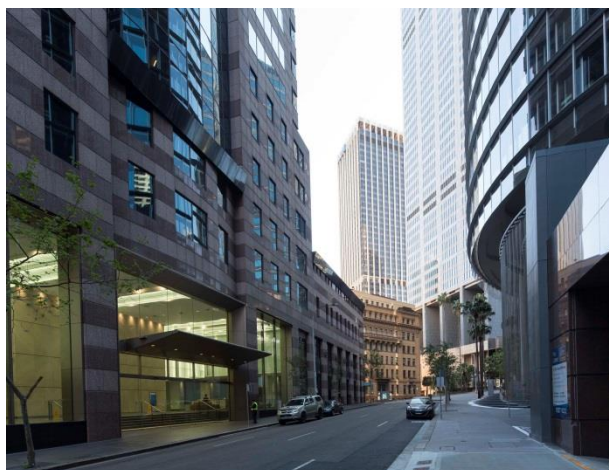
PICTURE 3 – EXISTING



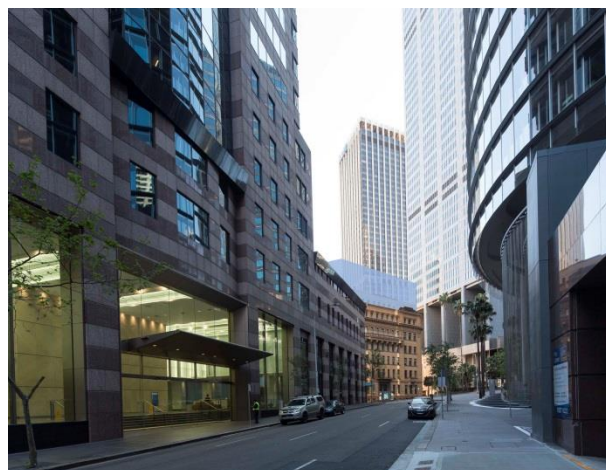
PICTURE 4 – PROPOSED

- The visual impact analysis indicates that the building envelope for a vertical addition on the Education Building will be visible from some elements of the public domain and streets to the south and west of the Education Building. The proposed additional built form is most visible from Farrer Place and the forecourt of No. 1 Bligh Street, and looking north along Bent Street. However, JPW's analysis is that the proposed massing reinforces the symmetry of the Education Building's Bent Street façade, and the top of the proposed volume relates to the reverse podium levels of Governor Phillip Tower to the north. While any additional built form constructed within this building envelope would be visible from Macquarie and Philip Street this is only from a distance, and does not obscure any of the views of the Lands Building when looking from the east.

FIGURE 23 – VIEW IMPACTS FROM O'CONNELL STREET AND BENT STREET (SOURCE: JPW ARCHITECTS)



PICTURE 5 – EXISTING



PICTURE 6 – PROPOSED



PICTURE 7 – EXISTING



PICTURE 8 – PROPOSED

- In summary, the proposed building envelope for a vertical addition to the Education Building will be visible from some existing view corridors and the public domain. However, the proposed envelope (in particular the setbacks from Bridge Street) assist with reducing the apparent scale at the Bridge Street frontage, and any interruption of views or unreasonable visual impacts on the Lands Building. While any additional built form constructed within this envelope will be perceived more to the south of the site, the Statement of Heritage Impact identifies that there will be no adverse impacts on the character or significance of either the Education or Lands Building or any other listed buildings in the vicinity of the site, including the Bridge Street/Macquarie Place/Bulletin Place Special Character Area.
- The SHI reinforces that the addition of new architectural components to the upper levels of historic buildings is a relatively mainstream approach to their enhancement, with the acceptability of such an approach dependent on a range of design criteria. The HIS clarifies that these design criteria have been adopted with regard to the positioning of the additional form on the Education Building, which they consider is evident from the visual impact analysis. Indeed, the detailed design at Stage 2 provides an opportunity for an innovative treatment of the facade of this vertical addition.

View Sharing

- With regard to the impacts of the proposed addition on the Education Building on 'private' views we have undertaken a high level evaluation of the view sharing principles established in the NSW Land and Environment Court in the matter of *Tenacity Consulting v Warringah* [2004] NSWLEC 140. We have also considered the planning principle regarding 'impact on public domain views' in *Rose Bay Marina Pty Limited v Woollahra Municipal Council anor* [2013] NSW LEC 1046.
- The following points are raised in this regard:

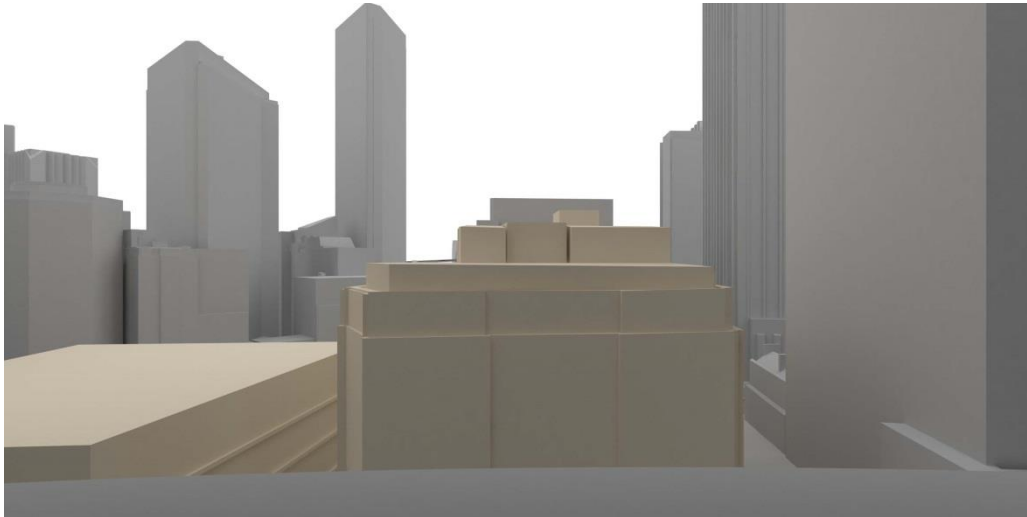
Private Domain Views

- Firstly, it is important to highlight that there are no directly affected residential views currently enjoyed across the Education Building. The proposed building envelope for the additional built form on the Education Building only potentially affects views from surrounding commercial office buildings.
- The most highly valued views within the local context are the views of Sydney Harbour and the Sydney Harbour Bridge. These are currently enjoyed by a range of commercial towers in the immediate vicinity of the site such as Governor Phillip Tower and 1 Bligh Street, which also enjoy iconic views to the east over the Botanic Gardens and Sydney Harbour. No part of the additional building envelope will completely obscure these views, noting that views to the north are available above Young and Loftus Street.
- Directly to the north of the Education Building is a 13-14 storey tower (Bridgepoint Apartments) which obstructs views to Sydney Harbour from the lower levels of 1 Bligh Street. As demonstrated in the visual impact assessment by JPW, the proposed building envelope for the Education Building has no discernible impact on the iconic views from 1 Bligh Street. The images below provide an indication of these views.
- As the proposed building envelope complies with the maximum building height standard (and other key development standards) under SLEP 2012 and has been designed so as to not create any additional impacts on the iconic views from surrounding commercial properties (and indeed no sensitive residential properties) the proposal is considered to be reasonable in accordance with the key view sharing principles established by the NSW LEC.

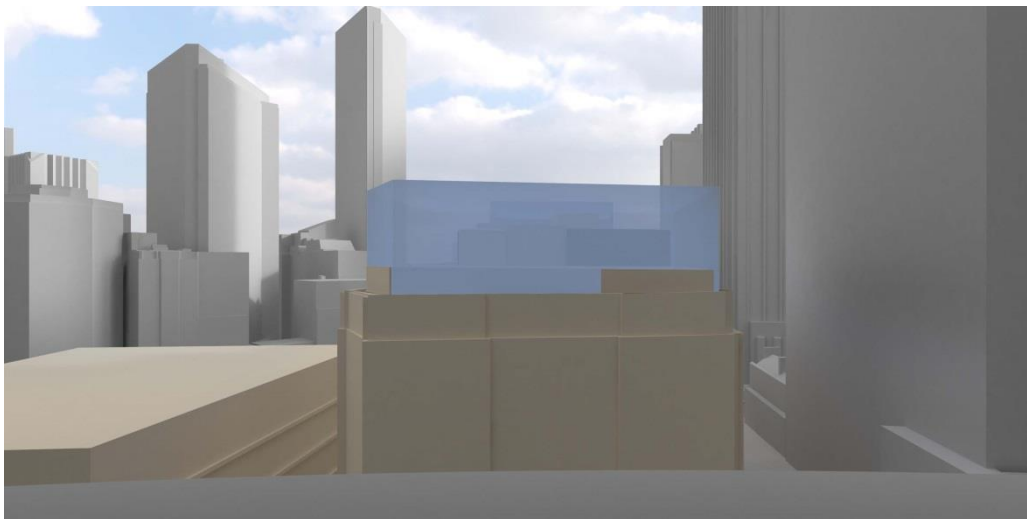
Public Domain Views

- In accordance with *Rose Bay Marina Pty Limited v Woollahra Municipal Council anor [2013] NSW LEC 1046* the framework for a planning principle concerning impacts on views enjoyed from the public domain is broadly consistent with (but not identical to) the matters raised for consideration in *Tenacity*. The process must account for reasonable development expectations as well as the enjoyment of members of the public of outlooks from public places.
- As discussed in the 'visual impact' section, the additional built form above the Education Building will be visible from the surrounding streets and public domain. However, as the additional built form is located above an existing building and is setback from the Bridge Street frontage, it will not have an impact on any iconic views enjoyed from the street to Sydney Harbour, or other notable views from the public domain in the precinct.

FIGURE 24 – VIEW IMPACTS FROM LEVEL 5 OF 1 Blich STREET (SOURCE: JPW ARCHITECTS)

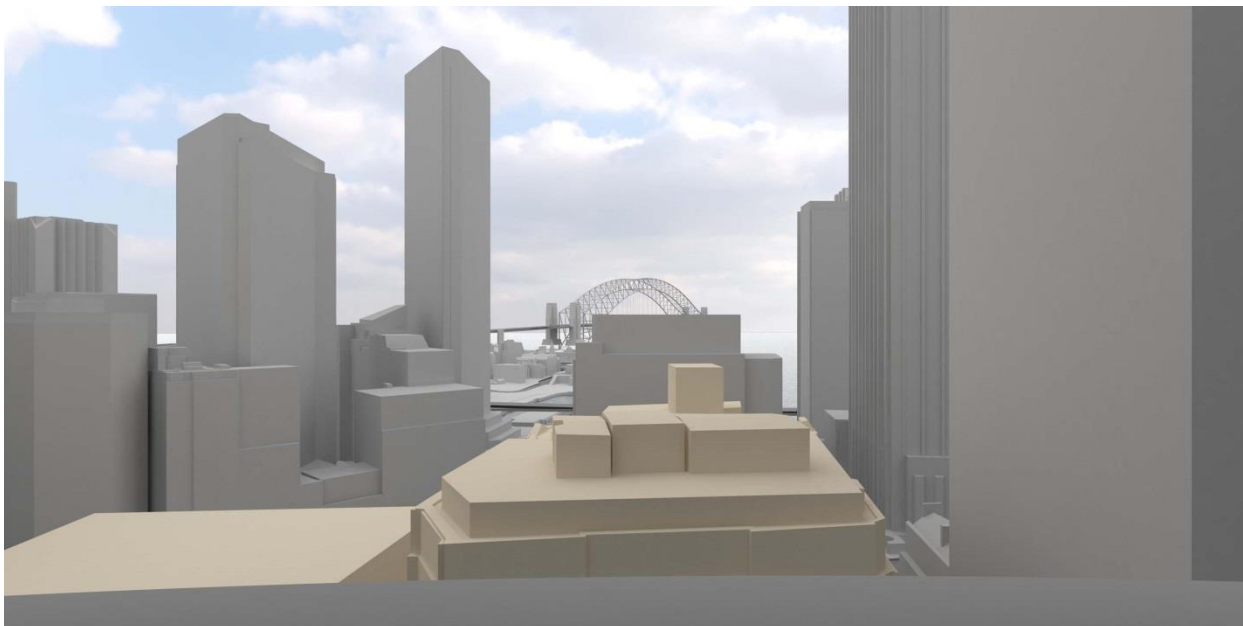


PICTURE 9 – EXISTING VIEW

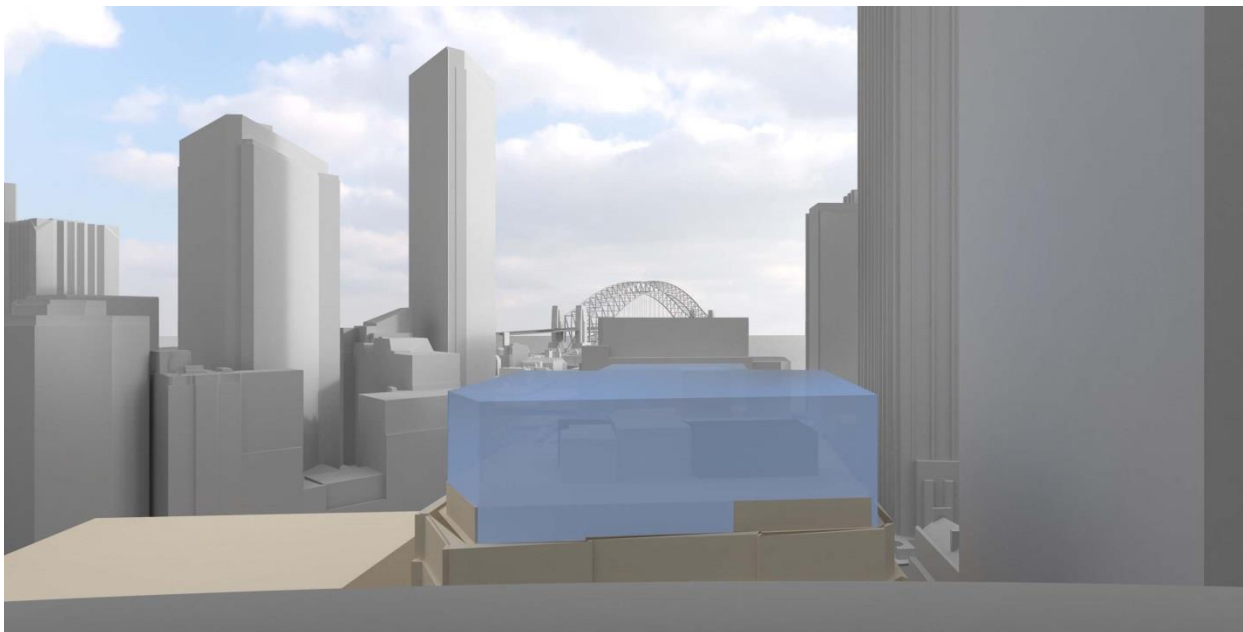


PICTURE 10 – PROPOSED VIEW

FIGURE 25 – VIEW IMPACTS FROM LEVEL 9 OF 1 BLIGH STREET (SOURCE: JPW ARCHITECTS)



PICTURE 11 – EXISTING VIEW



PICTURE 12 – PROPOSED VIEW

In response to the SEARs, the building envelope proposed as part of the Stage 1 development concept is of an appropriate height, built form and scale within the local context and complies with the underlying planning controls under the SLEP. A visual impact analysis has demonstrated that the proposed building envelope for additional built form to the Education Building will be visible predominantly from the south of the site, with a more defined setback at Bridge Street to ensure no unreasonable obstruction of views to the Lands Building occurs from this streetscape. This visual impact is supported on heritage grounds. Any iconic, private views from adjacent commercial buildings to Sydney Harbour will be negligible given the taller built form directly to the north of the Education Building.

6.4 AMENITY

The SEARs require the EIS to:

Demonstrate how the proposal will achieve a high level of environmental amenity, in particular overshadowing implications on the public realm from the vertical additions to the Education Building.

In response to the above SEAR, JPW Architects have prepared shadow diagrams (refer to Appendix I) which assess the potential shadow impacts on the surrounding public domain from the proposed building envelope for additions to the Education Building. These shadow diagrams assess various parts of the year, and in particular mid-winter (i.e. the worst case).

The key public domain areas of relevance to this assessment include Farrer Place, The Museum of Sydney and the forecourt/stair area of 1 Bligh Street.

The shadow diagrams indicate the following:

- During the summer solstice (December 21) and equinox periods (March 21 & September 21) the proposal will have a negligible degree of shadowing on the surrounding public domain.
- During mid-winter (June 21) a large portion of the precinct to the south of Bridge Street is already shadowed by virtue of the existing built form in the area (and taller buildings to the north of Bridge Street). In particular, Farrer Place, The Museum of Sydney and 1 Bligh Street are shadowed for extended periods of the day by existing built form during this period.
- In the morning period between 9.00am to 11.00am during mid-winter, the proposed building envelope for a vertical addition to the Education Building will cast a very minor additional shadow to the road verge in Connell Street which will be almost undiscernible when compare to the existing shadow situation.

FIGURE 26 – SHADOW IMPACT DIAGRAMS (SOURCE: JPW ARCHITECTS)

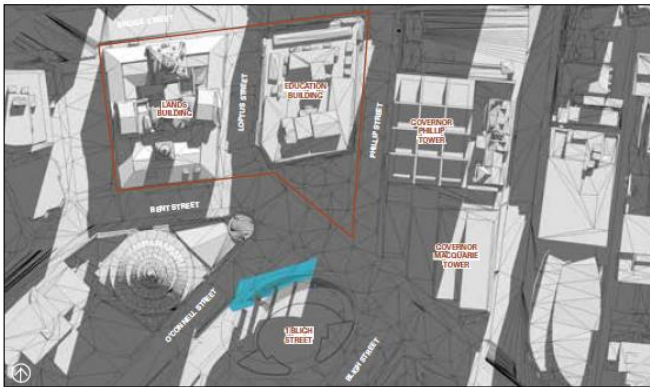


PICTURE 13 – SHADOW DIAGRAMS AT 9.00AM IN MID-WINTER

- From 11.00am through to 1.30pm during mid-winter there will be some additional shadows cast on the steps and space immediately in front of the steps adjacent to 1 Bligh Street. However, the degree of shadowing to the useability of this space varies considerably during this time period. At 11.00am the additional shadow is cast over the lower steps, with the mid and top steps not affected. By 11.30am there is some minor additional shadowing to the lower steps, and some middle steps remain in full sun. Between 12.00pm and 12.30pm there will be shadowing to the eastern steps, but no change to the shadowing at the western end. By 1-1.30pm there is very minor additional shadowing to the eastern steps, with the majority of the other steps retaining existing sun access. During this

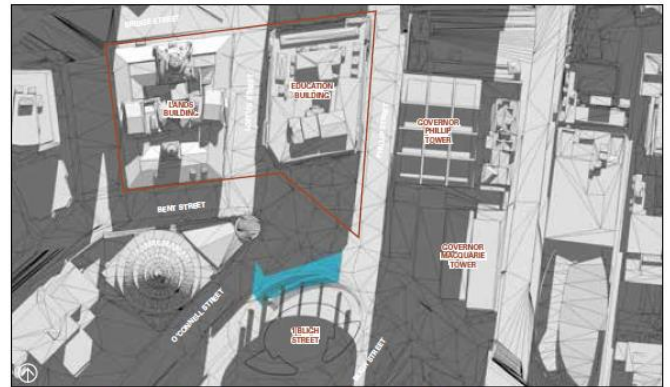
whole period, the café at the ground floor of 1 Bligh Street will not be affected by additional overshadowing.

FIGURE 27 – SHADOW DIAGRAMS 11AM TO 1.30PM (SOURCE: JPW ARCHITECTS)



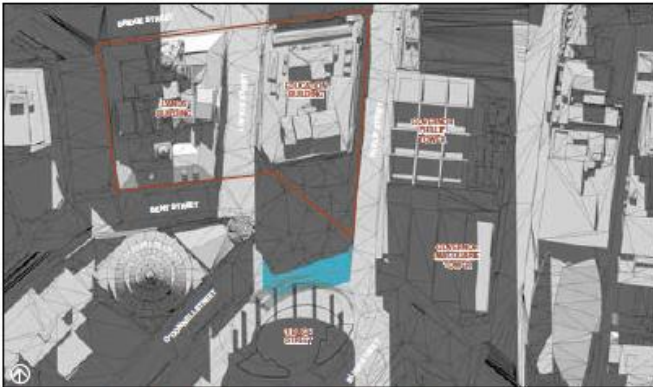
Comparison Shadows June 21, 11AM

Minor additional shadowing to lower steps, mid and top steps remain in full sun. Cafe sun access not affected.



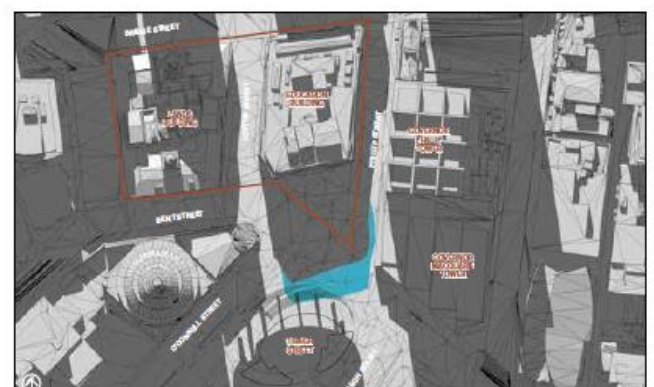
Comparison Shadows June 21, 11:30AM

Minor additional shadowing to lower and some middle steps, top steps remain in full sun. Cafe sun access not affected.



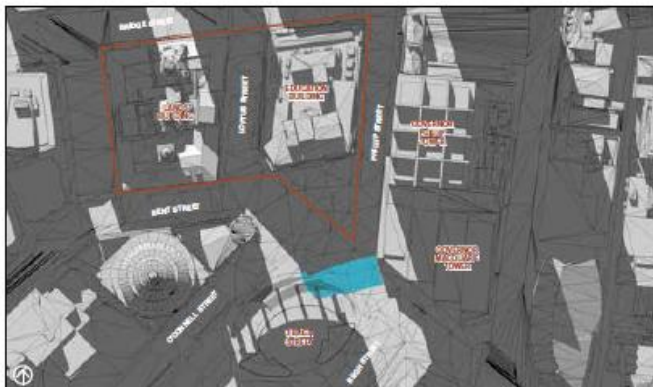
Comparison Shadows June 21, 12 Noon

Additional shadowing to eastern steps, no change to shadowing of steps at western end. Cafe sun access not affected.



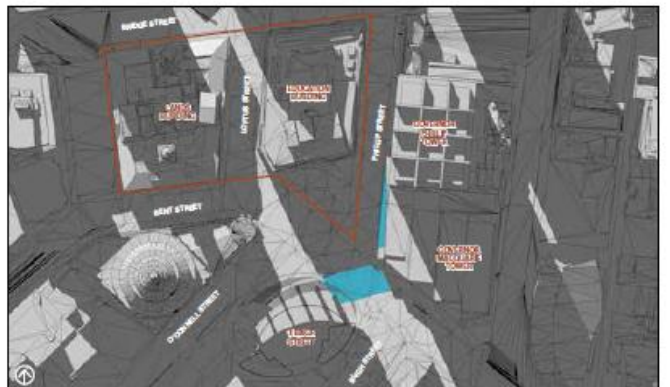
Comparison Shadows June 21, 12:30 PM

Additional shadowing to eastern steps, no change to shadowing of steps at western end. Cafe sun access not affected.



Comparison Shadows June, 1 PM

Minor additional shadowing to eastern steps, majority of steps retain existing sun access. Cafe sun access not affected.



Comparison Shadows June 21, 1:30 PM

Very minor shadowing of far eastern steps. Cafe sun access not affected.

- By late afternoon during mid-winter, the existing built form heavily shadows the surrounding public domain, with the only minor additional shadows on the road verge in Bent Street. See image over below.



PICTURE 14 – SHADOW DIAGRAMS AT 3PM IN MID WINTER

In summary, there is a very limited degree of additional shadowing to the stairs and forecourt of 1 Bligh Street around the midday period in mid-winter resulting from the proposed building envelope for additions to the Education Building. However, in terms of the useability and amenity of this space, the proposal is supported for a number of reasons, including:

- The stairs in front of 1 Bligh Street are a curved, elliptical shape with a large rise and depth which means that these are never entirely overshadowed during the full lunch-time period when the space may be used.
- The sun access to the café at the ground floor of 1 Bligh Street is not affected at all by the proposed additional bulk.
- Outside of mid-winter such as the equinox, the shadow impacts are substantially reduced.

In light of the above, the proposed building envelope for additions to the Education Building is considered reasonable with regard to the shadow impacts on the surrounding public domain.

6.5 HERITAGE

The Sandstone Precinct has significant heritage value with the Lands and Education Building both State Heritage Listed Items and the palm trees in Farrer Place local heritage items under SLEP. The site is also in the immediate vicinity of a number of other heritage items. The SEARs state that the EIS shall:

Provide a Heritage Impact Assessment which addresses:

All heritage items (state and local) including the subject sites and surrounding sites, and why the items and sites are of heritage significance, what impact the proposed use will have on the significance, what measures are proposed to mitigate negative impacts, and why more sympathetic solutions are not viable;

Impacts of the proposed use on the visual character of the area and its historical associations with government uses;

The suitability of the site for the proposed use and its implications on heritage conservation, including discussion on any other uses that have been considered and discounted;

Impacts of potential changes to the public domain, including access and landscaping;

Updated Conservation Management Plan(s) for the two buildings, addressing the proposed use including measures to minimise impacts of future development of the site; and

A preliminary archaeological assessment of the potential for Aboriginal cultural heritage, European cultural heritage and other archaeological items on the site, how such archaeology would be impacted by the proposal, and potential mitigation, in-situ conservation and interpretation measures for any archaeological resources uncovered during the works.

It is important to clarify that the applicant has been in ongoing consultation with the NSW Heritage Branch regarding the proposed development. This is discussed in more detail in the 'consultation' section of this report at Section 5.10.

In response to the SEARs a Statement of Heritage Impact (SHI) has been prepared by Graham Brooks & Associates in support of the proposal (see Appendix F). In summary, this provides the following key observations about the proposal:

- **All heritage items (state and local) including the subject sites and surrounding sites, and why the items and sites are of heritage significance, what impact the proposed use will have on the significance, what measures are proposed to mitigate negative impacts, and why more sympathetic solutions are not viable:** The SHI provides a detailed commentary and an explanation of how the proposed adaptive re-use of the site is supportable on heritage grounds. Both the buildings are of State Heritage Significance with their individual qualities enshrined within their 'Statement of Heritage Significance', and their ongoing management through the Conservation Management Plans for the sites. The SHI confirms that the proposed future use of the buildings for tourist and visitor accommodation can have a positive outcome on the long term continuity and evolution of the sites heritage significance.
- **Impacts of the proposed use on the visual character of the area and its historical associations with government uses:** The SHI provides that the impacts of the proposal on the visual character is supported, albeit that this is still yet to go through a detailed design review process. The SHI provides the following commentary on the historic association with government uses:

There will be a loss of that aspect of significance related to their current, traditional use and occupancy by state government administrative departments. However the foregoing analysis indicates that any change of use will effectively have the same degree of impact on that aspect of heritage significance of each of the two historic buildings related to the current, traditional occupancy by large scale state government administrative departments. There will be no adverse impacts arising from the change of land use of the "Sandstone Precinct" on the character or significance of the listed heritage items in the vicinity, nor on the significance of the Bridge Street/Macquarie Place/Bulletin Place Special Character Area.

- **The suitability of the site for the proposed use and its implications on heritage conservation, including discussion on any other uses that have been considered and discounted:** The SHI assesses a range of other uses that have been considered on the site, including occupation by another commercial user, residential conversion, cultural institution re-use and tourism relation uses. Overall, the SHI concludes that there is a strong potential for the project to mobilise extensive private sector financial resources and for their application to the retention, conservation and sensitive adaptive re-use for tourism related purposes of the Lands and Education Department Buildings. This is highly likely to have a very positive outcome on the long term continuity and evolution of the heritage significance, architectural character and public accessibility of these two fine and distinctive heritage buildings and their surrounding public domain.

- **Impacts of potential changes to the public domain, including access and landscaping:** The SHI provides that there is little or no risk of any adverse impacts on the surrounding public domain and existing landscaping in proximity to the site.
- **Updated Conservation Management Plan(s) for the two buildings, addressing the proposed use including measures to minimise impacts of future development of the site:** In consultation with the NSW Heritage Branch, Conservation Management Plans (CMPs) for the Lands and Education Building have recently been updated to take account of the current initiatives in relation to the disposal of these properties. These are included at Appendix F.

The updated CMPs take account of the proposed use of the Sandstone Precinct for commercial use (which would include tourism related uses), but the documents are not specifically limited to discussion of that use in isolation. Both CMPs were peer reviewed by the Heritage Division of the Office of Environment and Heritage in early October 2014. Comments that have arisen during this review process have been responded to by the authors of these documents.

The two CMPs establish the heritage management framework and contain a series of conservation policies against which the current proposal anticipated within the Stage 1 SSDA would be assessed in terms of potential heritage impacts. At the time of writing, the Draft CMPs were under review for potential endorsement by the NSW Heritage Council. It is envisaged that the timetable for potential endorsement will be concurrent with the Heritage Council's review of the Statement of Heritage Impact. Subject to potential endorsement by the Heritage Council it is envisaged that the updated CMPs will form the basis of assessing future Stage 2 development applications.

- **A preliminary archaeological assessment of the potential for Aboriginal cultural heritage, European cultural heritage and other archaeological items on the site, how such archaeology would be impacted by the proposal, and potential mitigation, in-situ conservation and interpretation measures for any archaeological resources uncovered during the works:** A preliminary archaeological assessment has been undertaken by Urbis in response to this requirement (see Appendix G). This provides that there is potential for European archaeological items to be present at the site given the heritage significance of the existing built form and surrounding historical context. A range of recommendations for future stages of the project are suggested in the archaeological assessment, which could form part of the Stage 2 DA conditions of development consent when the detailed design of the project is assessed.

In addition to the above, while not specifically identified in the SEARs, the SHI has provided a high level response to a number of other matters raised in the Heritage Branch's submission on the draft SEAR issued by the Department of Planning.

In summary, both the SHI and Archaeological Assessment support the proposed Stage 1 DA in the absence of any adverse or unacceptable impacts, with appropriate recommendations suggested for the future stages of the development when the detailed design is assessed.

6.6 SUBTERRENEAN WORKS

The SEARs clarify that the EIS shall:

Provide further detail regarding the proposed substratum space to create a pedestrian connection between the two buildings and the use of the sub terrain below Farrer Place for the potential back of house facilities, loading dock facilities, to support a hotel use and for potential car parking; and

Demonstrate that the proposed development below ground level at Farrer Place (zoned Public Recreation) is consistent with the Sydney LEP 2012 and will not have any adverse impacts on the recreational use of the space.

The concept proposal includes the potential for subterranean linkages between the two buildings (most likely underneath Loftus Street) for the provision of hotel and associated ancillary services and support infrastructure, including but not limited to such as back of house facilities, loading, access and car parking. However, at this stage there is no degree of certainty as to whether the proposed subterranean works are ultimately required by future long term leaseholders of the site.

Accordingly, the Stage 2 development application will clarify whether or not any works are proposed within the subterranean envelope the subject of this Stage 1 development application.

Ultimately, any future development beneath the road reserves will be subject to separate agreement with the City of Sydney as the relevant roads authority and landholder. This arrangement will be explored during the Stage 2 DA phase when there is more certainty regarding the extent, if any, of subterranean works proposed within the subterranean envelope.

However, it is equally important for those parties who see the importance of the subterranean works to have some degree of certainty that this option has conceptual merit. Therefore, the proposed architectural drawings and technical inputs (such as the heritage, archaeology and structural reports) support that this initiative. In particular:

- The Statement of Heritage Impact clarifies that the concept of underground connectivity with heritage items has received universal acceptance from public agencies, specialist heritage practitioners and the general public. Examples include The Louvre in Paris and The Rijksmuseum in Amsterdam.
- The Desktop Archaeological Report states that while there is potential for excavation and construction of future subterranean connections to disturb archaeological relics and foundation material of each building, the detailed design and potential impacts can be managed in the final project through the preparation of a detailed Archaeological Assessment and award of a future Excavation Permit for the works.
- The Traffic Assessment clarifies that there are numerous public car parking opportunities in the surrounding CBD context which can be used by potential hotel operators to satisfy car parking demands of future occupants rather than underground parking. Accordingly, LEP adopts maximum parking requirements (rather than minimums) and future proponents are not required to provide any additional car parking spaces in this highly accessible location.
- Preliminary structural advice and liaison with TNSW/Railcorp indicates that minor excavation to accommodate subterranean works will not have any impacts on the Interim Rail Corridor in proximity to the site which is located 60 metres below ground.

Therefore, in light of the above, GPNSW would request that the Department of Planning & Infrastructure support the a conceptual envelope for subterranean works, including a proposed link.

With regard to potential impacts of the subterranean works on the public domain of Farrar Place, JPW Architects have advised that these works must not create any projections (such as ventilation stacks or elements for servicing) or items within the public domain. Any of these services will need to be concealed below ground so as not to cause any potential visual impacts or cluttering of this space. Ultimately this will need to be resolved once the servicing arrangements for the site are explored by potential long term leaseholders at Stage 2.

6.7 TRAFFIC AND ACCESS

The SEARS state that the EIS:

Must include a Traffic Impact Assessment (TIA) that evaluates:

- *Existing transport networks;*
- *Daily and peak traffic movements generated by the project;*
- *Safety and performance of the surrounding road network;*
- *Demonstration of the provision of sufficient car parking in accordance with the relevant guidelines/standards and/or justification for any inconsistencies;*
- *Connections to existing and planned public transport;*

- *Pedestrian and cycle access within and to the site;*
- *Any proposed temporary or permanent changes to transport and access on surrounding streets;*
- *Opportunities to provide safe and efficient loading and servicing for the development; and*
- *Mitigation measures for the impacts identified in the TIA.*
- *Relevant Policies and Guidelines:*
- *Guide to Traffic Generating Development (RMS);*
- *EIS Guidelines – Road and Related Facilities;*
- *NSW Planning Guidelines for Walking and Cycling;*
- *Sydney City Centre Access Strategy; and*
- *Sydney Local Environmental Plan 2012 car parking rates.*

A Traffic Impact Assessment has been prepared by ARUP (see Appendix J) in support of the application and in response to the above SEARs. In summary, the report demonstrates that:

- **Existing Transport Networks:** The site is highly accessible to public transport, with the significant majority workers in the precinct relying on non-car modes of transport, with the proportion of car usage less than 20%. The existing traffic volumes (based on survey analysis) indicate that Bridge Street carries the majority of traffic in the precinct, with Loftus and Gresham Streets utilised only by a minor number of vehicles.
- **Daily and Peak traffic movements generated by the project:** The hotel will generate a small number of private vehicular movements, with a demand of only 27 vehicles to be parked overnight.
- **Safety and performance of the surrounding road network:** The traffic modelling demonstrates the small increase in traffic will have a negligible impact on the operation of nearby intersections, with no upgrades or improvements required at these locations to facilitate the development.
- **Demonstration of the provision of sufficient car parking in accordance with the relevant guidelines/standards and/or justification for any inconsistencies:** The final number of parking bays will ultimately be determined during the Stage 2 DA, however based on an indicative hotel yield of 271 rooms, this would permit a maximum of 27.1 car parking spaces under the SLEP. The Traffic Report clarifies that it is likely that many hotel guests will utilise taxis and public transport to transfer from the airport of wider Sydney region and that a low car parking mode of 10% could be applied to the site. As the existing site provides for up to 12 car parking bays, the residual spaces would be easily available to be accommodated in surrounding commercial car parks (via a concierge service).
- **Connections to existing and planned public transport:** The site is in close proximity to existing heavy rail (Circular Quay, Wynyard, Martin Place), bus routes and the planning Sydney Light Rail as discussed in the Traffic Report in more detail.
- **Pedestrian and cycle access within and to the site:** The Traffic Report indicates that the proposed Light Rail will improve surrounding pedestrian links, and cycle access will be enhanced by the proposed bi-directional cycleway on Pitt Street as part of the Sydney City Centre Access Strategy.
- **Any proposed temporary or permanent changes to transport and access on surrounding streets:** No temporary or permanent changes to transport and access on surrounding streets are proposed as part of this application. Any amendments would be subject to the Stage 2 DA process when the detailed design of the buildings is resolved.
- **Opportunities to provide safe and efficient loading and servicing for the development:** The proposal does not seek to change the existing vehicular access, loading and servicing components of

this application. Any amendments would be subject to the Stage 2 DA process when the detailed design of the buildings is resolved.

- **Mitigation measures for the impacts identified in the TIA:** No unreasonable traffic impacts are envisaged at this stage. ARUP provide that the implementation of Travel Plan would contribute to reducing traffic demands and encourage other forms of transport to the Sandstone Precinct. This could form part of a condition of consent for the Stage 2 DA.
- **Relevant Policies and Guidelines:** ARUP have considered the various policies and guidelines in the Traffic Report.

Overall, the Traffic Report clarifies that the transport impacts arising from the proposed development application are acceptable and can be appropriately managed.

6.8 INFRASTRUCTURE IMPACTS – INTERIM RAIL CORRIDOR

The SEAR clarifies that the EIS:

Shall detail the likely effect of the proposal in consultation with Transport for NSW on:

- *The maximum extent of in ground works, including submission of detailed sections and elevations which show the RL depth of excavation;*
- *The practicability and cost of carrying out rail expansion projects on the land in the future;*
- *The structural integrity or safety of, or ability to operate, such rail projects; and*
- *The land acquisition costs and costs of construction, operation or maintenance of such projects.*

The applicant's structural engineer, TTW Engineers, have consulted with Transport for NSW in relation to the Interim Rail Corridor that is in close proximity to the site. A letter was sent to TNSW on 11 November 2014 which provided a package of information outlining the extent of excavation proposed (see Appendix E) and a letter of in-principle support will be issued by late November.

In summary, the potential excavation required is significantly distanced/separated from the future rail tunnels (which are approximately 60 metres below the buildings).

The applicant will continue to liaise with TNSW during the assessment of the application, and subsequently when the Stage 2 DA is being assessed.

6.9 ECOLOGICALLY SUSTAINABLE DEVELOPMENT

The SEARs clarify that the EIS shall:

Identify how the development will incorporate ESD principles in the design, construction and ongoing operation phases of the development.

In response to this requirement, the applicant engaged ARUP to prepare an ESD Report (see Appendix K) which provides a number of high-level ESD focus areas for the next phases of the project. In summary, this includes the following key initiatives:

- **Energy** – The existing heritage buildings on the site perform well from a NABERs energy rating perspective, and the through retention of the heritage façade elements it is expected that the new development should attain similar benefits from the low window-to-wall ratio and high thermal mass. At the Stage 2 DA phase, the provision of newer, more efficient plant will allow for energy efficiency opportunities to be explored. ARUP consider that a range of initiatives such as load reduction, passive systems, active systems, energy recovery, renewables and offsets could also be reviewed at the Stage 2 DA stage.

- **Water** – ARUP recommend that a range of initiatives could be explored to reduce water utilisation in the project including fixture savings, irrigation savings, mechanical savings, low-impact sources, typical supply and offsets.
- **Transport** – From a sustainability perspective the site is in close proximity to a variety of public transport options. Similar to the recommendations of the Traffic Plan, initiatives to encourage further use of public transport (such as a Travel Plan) could be explored in further detail at Stage 2.
- **Materials** – ARUP stipulate that the embodied energy and carbon associated with the existing heritage buildings is substantial and that the adaptive re-use of the buildings is a significant step in material usage. The detailed design will need to consider additional opportunities to maximise the reclaim of material to improve the overall material efficiency of the development.
- **Societal** – The preservation of the existing buildings is considered to provide a strong contribution to the social sustainability of the local Sydney city community according to ARUP.

Overall, the ESD Strategy for the site (at this stage) is focused on providing appropriate frameworks for implementing ESD initiatives to provide flexibility for both the applicant and future developer of the site. ARUP consider that the proposal is inherently underpinned by strong ESD underpinnings which can be explored further during the Stage 2 DA process.

6.10 CONSULTATION

The SEARs clarify the following consultation requirements to be addressed in the EIS:

During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners. In particular you must consult with City of Sydney Council, Roads and Maritime Services, Heritage Council of NSW, and Transport for NSW.

Consultation with key government agencies including City of Sydney Council and the NSW Heritage Branch has taken place in advance of this request. We trust that this initial consultation has assisted these agencies in familiarising themselves with the proposal, and will provide context when the Department of Planning and Environment formally request their feedback as part of preparing the SEARs.

The applicant has engaged extensively with relevant stakeholders at a local and state level including City of Sydney Council, Heritage Council of NSW, Transport for NSW, State Transit, and the NSW Department of Planning and Infrastructure. This has assisted with the preparation of the application, and has shaped the SEARs have been addressed in this EIS.

The table below provides a summary of various types of correspondence that have taken place between key agencies and stakeholders prior to the lodgement of the application. This includes meetings, phone discussions, emails and briefings over the last 6-12 months.

TABLE 7 – CONSULTATION SUMMARY

STAKEHOLDERS	DATE OF CORRESPONDENCE	KEY MATTERS DISCUSSED
NSW Department of Planning & Environment	8 July 2014	Key discussions with the Department have related to clarity around the SSDA process, and confirmation of timing and procedural aspects of the preferred Stage 1 DA process.
	5 August 2014	
	15 October 2014	
	17 November 2014	It was confirmed that based on the SSDA criteria that the project was of 'state and regional significance' and that SEARs would need to be requested.
		Officers at the Department advised that the applicant

STAKEHOLDERS	DATE OF CORRESPONDENCE	KEY MATTERS DISCUSSED
		should consult with the City of Sydney Council, NSW Heritage Branch, STA and TNSW. They advised that draft CMPs that have been through a revision process would be beneficial to review once the SEARs Request was made. The Department have provided ongoing assistance with the applicant's interpretation of the environmental assessment requirements and also clarified their interpretation of the maximum height standard under SLEP. GPNSW will work closely with the Department during the assessment of the application, and respond to queries as they arise.
Heritage Council of NSW	4 August 2014 20 August 2014 25 August 2014 11 September 2014 24 September 2014 2 October 2014 7 October 2014 13 October 2014 15 October 2014 19 November 2014 August – November – Various phone discussions	The applicant has had ongoing discussions with senior officers from the NSW Heritage Branch given the obvious heritage significance of the Lands and Education Buildings. The NSW Heritage Branch agreed to undertake a peer review of updated CMPs prior to the submission of the SEARs Request. This accorded with advice from the Department of Planning. Comments from the peer review process were issued to GPNSW on 24 September 2014. Following updates to the CMPs, these were re-submitted to the Heritage Branch on 13 October 2014. On the 19th of November, GPNSW and Consultants met with the Heritage Division to discuss the CMP comments. Ongoing negotiation with the Heritage Council will be critical following the submission of the DA to clarify any queries and to deal with these proactively.
City of Sydney Council	21 July 2014 14 October 2014 15 October 2014 August-November – Various phone discussions	GPNSW met with the Director of Planning at City of Sydney Council on 21 July 2014 to provide a formal briefing on the project and to confirm the planning approval process. It was clarified that the project was of state and regional significance in accordance with the State and Regional Development SEPP, with the Minister for Planning being the relevant approval authority. Council identified that the use of subterranean space in

STAKEHOLDERS	DATE OF CORRESPONDENCE	KEY MATTERS DISCUSSED
		Council-owned spaces, such as under Loftus Street, would require further resolution and that an agreement would need to be in place relating to this. GPNSW clarified that this arrangement ultimately wouldn't be resolved until a potential long term leaseholders confirmed whether the use of this subterranean was absolutely necessary to them, which would be at the Stage 2 DA phase of the project. Following this meeting, Council were advised that GPNSW were submitting a request for SEARS, but identified that there would be additional opportunities for further consultation with Council throughout the Stage 1 DA process. Council provided GPNSW with a relevant contact person during the EOI phase of the project, to ensure that there was consistency in relation to queries from potential long term leaseholders. Ongoing consultation with the City of Sydney will take place during the Stage 1 DA process, and GPNSW will be in regular contact with Council over the coming months.
Transport for NSW	11 November 2014	The applicant's structural engineers, TTW Engineers, have had liaison with TNSW in relation to the interim rail corridor which is in close proximity to the site.
State Transit Authority	28 July 2014 12 September 2014 8 October 2014	GPNSW has had meetings with the STA to discuss the Review of Environmental Factors in relation to the bus networks in proximity of the site. The REF that proposed new layovers and bus only lanes on Loftus Street. However, STA confirmed that the final REF will not include any new layovers or bus only lanes on Loftus Street

Further consultation will take place with these agencies following the lodgement of the Stage 1 DA.

In accordance with the Regulations, this EIS will be placed on formal public exhibition during which time any person may make a submission on the proposal. Following this exhibition period, the applicant will respond to matters raised in submissions, and if necessary, undertake more extensive consultation.

7 Conclusions

This project represents a unique strategic opportunity to promote the adaptive re-use of tourism and visitor accommodation in an iconic precinct in the heart of Sydney's CBD. This accords with the State, Regional and Local strategic initiatives to promote tourism and ultimately contribute to doubling the visitor expenditure of NSW by 2020.

The Stage 1 DA process seeks approval for a concept proposal for the use of the Sandstone Precinct for tourist and visitor accommodation, complimentary ancillary uses, including (but not limited to) retail premises and a function centre and a building envelope (including defined by a maximum building height) that will facilitate the adaptive re-use, extensions and alterations to the existing buildings. This concept proposal will, if approved, provide certainty about key development parameters central to the Government's future vision for this important site. This ensures that the adaptive re-use of the site for tourist and visitor accommodation is clearly conveyed to prospective long term leaseholders, and there is a reasonable expectation regarding the achievable building height, particularly in relation to the Education Building. However, flexibility with the parameters of this Stage 1 proposal is critical to ensure that a great design outcome is achieved during the Stage 2 DA phase of the project.

This EIS and supporting technical inputs assess the impacts of the proposal and provide justification for the proposed development, and respond to the various environmental assessment requirements which have been prepared in consultation with relevant agencies and stakeholders of the project. Overall, this evaluation supports the proposed development and provides that the environmental impacts are reasonable.

In summary, the project has the following key public benefits and should be supported for the following reasons:

- The project will provide much needed tourist and visitor accommodation which supports the actions and objectives of the State Government's plan to double the visitor expenditure of NSW by 2020 and address the visitor accommodation shortage in Sydney. This will reinforce and enhance Sydney's position in the global economy.
- The project has the potential for 2,054 full time jobs (based on multiplier effects) during the construction and operational phases of the development.
- The proposed development concept and adaptive re-use of the existing heritage items has been designed in a manner which reduces any unreasonable impacts on the heritage significance of these buildings, and on the surrounding public domain. The Statement of Heritage Impact and Conservation Management Plans (in the process of being updated) provide a framework for the ongoing conservation and assessment of the future, detailed design components by the future long term leaseholders of the site.
- The proposal responds positively to the strategic and statutory planning framework which relates to the site. The project is consistent with the aims and objectives of a range of State, Regional and Metropolitan planning initiatives, and satisfies the local objectives and key development standards of Sydney Local Environmental Plan 2012 (SLEP 2012).
- The supporting technical studies which accompany this EIS establish that the environmental impacts of the proposed concept are generally positive, and where appropriate, make recommendations for the detailed design phase of the project which will provide certainty and clarity during the assessment of the Stage 2 DA.
- The proposal has been through ongoing consultation with key government agencies including City of Sydney Council, NSW Department of Planning and Infrastructure (DPI), NSW Heritage Branch, Transport for NSW and the State Transit Authority prior to the lodgement of this application. This has assisted with shaping the SEARS for the project, and providing a response to a range of queries on the project.
- This Stage 1 DA seeks to provide certainty about the use, key development parameters, and adaptive re-use potential of the existing buildings on the site. This approach provides ultimate flexibility to the

potential long term leaseholders of the site, while demonstrating that the environmental impacts are reasonable and acceptable at a conceptual level.

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

Appendix A

Secretary's Environmental Assessment Requirements

Appendix B

Capital Investment Value Report

Appendix C

Site Survey

Appendix D

Architectural Drawings

Appendix E

Structural Assessment

Appendix F

Statement of Heritage Impact

Appendix G

Archaeological Assessment

Appendix H

View Impact Analysis

Appendix I

Shadow Impact Analysis

Appendix J

Traffic Impact Assessment

Appendix K

ESD Report

Appendix L

Preliminary Environmental and Hazardous Materials Assessment

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