



Additional Response to Submission

City of Sydney (R/2016/41/B)

Comments	Response
1b. Public Benefits	
<p>The Draft PPPS specifies that each key site must deliver public benefits that contribute to both peninsula-wide and sub precinct outcomes over and above the necessary infrastructure to support growth. The RTS confirms the following public benefits to be secured by the concept proposal:</p>	<p>The proposed envelope has been designed to ensure flexibility for a future design excellence process.</p>
<p>i. Publicly Accessible Open Space</p> <p>A minimum total area of 8,200sqm of publicly accessible open space is proposed to be provided and upgraded across and adjoining the site. Within this area, the following commitments are made:</p>	<p>Spatial allowance for large scale public domain elements, e.g. Guardian Square and the new Bunn Street bridge, are clearly visible and integrated within the proposed envelope.</p>
<ul style="list-style-type: none">— Guardian Square (1,500sqm)— A widened and upgraded waterfront promenade (4,800sqm)— Bunn Street Bridge— Event Stairs— Ribbon Stairs— Central through-site link— Upgrade of existing northern pedestrian bridge— New paving to Pyrmont Bridge— Activation works	<p>Others have been allowed for within the body of the proposed envelope volume as demonstrated and tested via the illustrative scheme. This approach allows these elements to be refined during the design excellence process to suit the final design proposal. The current application is for a SSDA Stage 1 approval.</p>
	<p>All such public realm commitments have been embedded in the ‘Public Domain and Urban Design Guidelines (Appendix I)’ as prepared by fjmt and the ‘Public Domain and Landscape Design Report (Appendix H)’ prepared by Aspect Studios as part of the Response to Submission in October 2020. These elements will form part of the brief for the future design excellence process.</p>
<p>Such improvements are supported in principle and are considered essential to support the increased and anticipated development intensity of the site. Many are basic requirements that should be delivered as part of any redevelopment.</p>	
<p>However, as proposed some public benefits appear tokenistic as they do not sufficiently integrate and correlate with the existing public domain levels and appear as stand-alone elements made to serve the development. Of greatest concern is that none of the above mentioned public domain elements intended for public benefit are embedded in the building envelope drawings. As such, there is no certainty that these will be delivered and secured.</p>	
<p>In addition to the above, the genuine offering of these spaces for public benefit are challenged with respect to the accessibility, viability, and usability as public open space with landscaping and tree planting. This is discussed in detail later in this submission.</p>	



/ Guardian Square

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Comments	Response
1c. Height	
<p>The increased height of the building envelope is established from the Draft PPPS. There are three special considerations envisioned for the Harbourside site, which include protecting solar access to the harbour foreshore public domain, prioritise the delivery of employment, entertainment and tourism floor space and towers below RL170.</p>	<p>The proposed built form has been considered and demonstrated throughout the RTS documentation to be appropriate for the site.</p>
<p>Of the three above mentioned special considerations, the tower below the height of RL170 is solely delivered as part of this proposal. As previously mentioned, the proposal does not prioritise the provision of employment and tourism floor space. The proposal does not protect solar access to the harbour foreshore public domain (as discussed in the Overshadowing discussion below).</p>	<p>Refer to ‘Architectural Design Report (Appendix D)’ prepared by fjmt and ‘Response to Submissions and Further Amended Concept Proposal’ prepared by Ethos Urban for the Response to Submission in October 2020.</p>
<p>The optimisation of height is to go hand in hand with the delivery of the other special considerations for the Harbourside and must not be considered in isolation. The Draft PPPS is preliminary and no testing or rationale has been provided in the document that justifies the maximum height of RL170. Accordingly, establishing the height of the development in consideration of the draft PPPS is premature. The application must establish an appropriate height of the tower through first principles with community and stakeholder consultation.</p>	<p>The balance of tower height, solar access and the provision of employment and tourism floor space were key elements of the workshop process and subsequent meetings as facilitated by the Department from June 2019 to September 2019. During this process tower height was reviewed and adjusted with consideration of urban design, environmental impacts (including solar access), view sharing and public realm opportunities.</p>
2a. Wind Impacts	
<p>Concern is raised regard the unaccepted wind impacts to some aspects of the development. The submitted Wind Assessment Report describes the wind conditions as exceeding the Lawson distress criterion with an able-bodied rating for both the building envelope and indicative designs. This is not suitable for pedestrians that have mobility impairments, the elderly, or children.</p>	<p>The submitted Wind Assessment Report ‘Wind Tunnel Assessment (Appendix L)’ recommended potential mitigation measures which will be developed during detailed design relative to the identified locations.</p>
<p>The Report also highlights that the envelope creates issues in several instances that must be rectified through detailed architectural and landscape design. For example, the only outdoor communal open space on Level 4 is deemed suitable for ‘business walking’ only and fails the ‘distress criteria’. This is unacceptable, even at this stage. The building envelope and allocation of accessible outdoor space must respond to this. Landscape design and vegetation can be employed to mitigate adverse wind conditions, but the architectural section drawing submitted with the application indicates soil depths are suitable for ground covers only, if at all. This should be amended to again allow for both trees and shrubs at soil depths ranging between 450mm-1000mm.</p>	<p>The proposed building envelope has been developed to allow these measures to be addressed during detailed design in Stage 2 DA as suitable for the outcome of the future design excellence process.</p>
2c. Public Domain Interface	
<p>Insufficient and inconsistent information is for provided for existing ground levels including the foreshore promenade and surrounding streets to adequately understand the relationship of the development and immediate context. Refer to Public Domain discussion below.</p>	<p>A survey drawing is included as part of the submission. Ground levels as indicated on the illustrative deign plans have been developed with consideration of this together with technical requirements as related to flooding (as noted elsewhere within the accompanying technical reports).</p>
	<p>Detail resolution of levels and ground level interfaces will be subject to a future design excellence process and subsequent DA submission. The current application is for a SSDA Stage 1 approval.</p>

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Comments	Response
2d. Building Envelope	
There is insufficient information submitted for the building envelope. As previously mentioned, the drawings do not show any of the above mentioned public domain elements including Guardian Square, Event Stairs and Ribbon Stairs. These are to be included in the building envelope plans, elevations and sections to ensure delivery.	Refer to comments as provide relative to 1b. Public Benefits.
	The envelope has been documented to allow an appropriate level flexibility for a future design excellence process.
The tower to the west does not have an upper level setback from the podium. The wind report indicates that the building envelope has a poor comfort rating at the base of the tower along Darling Drive and the indicative scheme shows that it is only suitable for walking near the base of the tower along Darling Drive.	The envelope has been refined following the completion of a number of workshops between the Department and Mirvac. The envelope has been developed to ensure that it has capacity to incorporate appropriate wind mitigation measures as appropriate for a future detailed design proposal.
Overall, the building envelope is excessive and extends closer to both the Pyrmont Bridge and the edge of the promenade. The podium needs to be pushed back to the existing lot boundary of Harbourside and the tower setback from both the eastern and western ends above the podium. A greater setback is also required from the Pyrmont Bridge to provide some curtilage from the heritage item. The height of the podium especially adjacent to the Pyrmont Bridge is to be lowered to ensure views to the water from the Bridge.	Refer to 'Architectural Design Report (Appendix D)' prepared by fjmt and 'Response to Submissions and Further Amended Concept Proposal' prepared by Ethos Urban for more information.
	The proposed envelope was subject to a workshop process and subsequent meetings as facilitated by the Department from June 2019 to September 2019. During this process the envelope was reviewed and adjusted with consideration of urban design, environmental impacts (including wind and solar access), view sharing and public realm opportunities.

2e. Overshadowing

The RTS has provided more fine-grained intervals (15 minutes) for overshadowing, the previous submission showed hourly intervals. This demonstrates that overshadowing of the Promenade starts at 12.30pm and continues until 3pm.	The proposed tower position and associated envelope has been developed with an holistic consideration of urban design, environmental impacts (including wind and solar access), view sharing and public realm opportunities.
For at least half of lunch time at mid-winter the Promenade is in full shade. The proponent is proposing a 'regularised waterfront setback'. However, if the existing lot boundary of 29m from the water's edge is maintained, the overshadowing caused by the building envelope will be negligible at 12.30pm and only occupy half the width of the promenade at 12.45pm, three-quarters at 1pm and so on, thus optimising the lunch time sun at mid-winter. Additionally, if the tower was setback 37m from the (29m from the water's edge plus 8m upper level setback), this would further reduce the overshadowing of the promenade at mid-winter at lunch time as the tower building envelope begins to cause overshadowing of the promenade from 1.00pm.	The envelope has been documented to allow an appropriate level flexibility for a future design excellence process. As demonstrated within the RTS documentation, a variety of tower forms may be accommodated with the envelope. This offers opportunity for further refinement and reduction of overshadowing relative to the SSDA1 envelope.
No new lot boundaries have been shown, however, the development area has increased and with it the overshadowing of the promenade appears to have increased. There is insufficient information provided regarding overshadowing of neighbouring buildings. This is to be demonstrated by filling in the City of Sydney 'Solar Access Tally at 15-minute Intervals' spreadsheet.	The City of Sydney 'Solar Access Tally at 15-minute Intervals' spreadsheet or an equivalent would from part of a future DA submission once the outcome of a future design excellence process is known.

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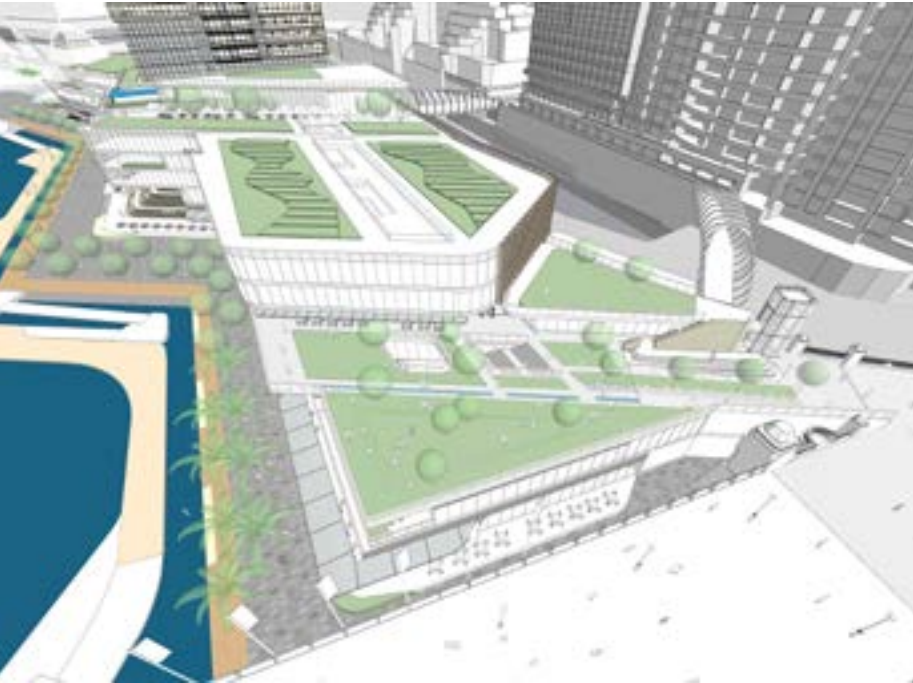
Comments	Response
3. Heritage	
It is acknowledged that the amended building envelope responds to the City's recommendation for a lowered podium height to the north of the development. It is also noted that the lowered podium follows a 30-degree angle sightline and separation from the Pyrmont Bridge.	The proposed built form has been developed following the completion of a number of workshops between the Department of Planning and Mirvac. The outcome of which included proposed further refinements to the built form of the podium and tower, with the refinements considered to be positive.
However, the amended envelope demonstrates a tiered podium to the north with varying levels of RL 25 and RL13.25. The RL 13.25 lower tier is still considered excessive and blocks sightlines from the Bridge. To enable clear site lines and uninterrupted views from the west, the lower tier is recommended to be further reduced to be no higher than the Bridge surface, at approximately RL 11.5.	One of the key refinements following the workshops with the Department is the reduction of height and bulk of the northern part of the podium. It has been reduced by 1 to 3 storeys, from RL 25m to part RL 17.6m and part RL 13.75m. The rooftop of this section of the podium will instead comprise a new public space; 'Guardian Square'.
Further, the improve the relationship of the development with surrounding buildings, the north-east corner of the podium should replicate the slanted building alignment of the Maritime Museum so as to increase the openness of the underbridge public open space.	The height of the envelope adjacent to the Pyrmont Bridge at RL13.75 seeks to allow for balustrades and varying soil depths to support a diversity of planting while maintaining clear sight lines from the west and the adjacent Pyrmont Bridge.
	Refer to 'Architectural Design Report (Appendix D)' prepared by fjmt and 'Response to Submissions and Further Amended Concept Proposal' prepared by Ethos Urban for more information.



/ View of Guardian Square from Pyrmont Bridge

Additional Response to Submission City of Sydney (R/2016/41/B)

Comments	Response
6c. Guardian Square	
<p>The introduction of Guardian Square is a positive element. However, it is located over 2 levels, which do not relate to the surrounding existing public domain levels. One level (+17.6) appears to be aligned with the Murray Street bridge and the lower level (+13.75) with the existing levels at the western end of the Pyrmont Bridge. The levels of the upper and lower levels of Guardian Square appear to be determined by the retail levels in the podium, connecting with the retail rather than seamlessly connecting with the adjacent public domain. A photomontage from the western end of the Pyrmont Bridge would be helpful in describing the relationship of Guardian Square with the Pyrmont and Murray Street Bridges as wells as the levels relative to the existing structures. It may also inform if the alignment of the building is appropriate to the context, especially in relation to the heritage elements of the Pyrmont Bridge. The existing arrangement tries to fit the built form between the two alignments of the Bridge's balustrade.</p> <p>However, more information is required for the levels and gradients as this is not clearly documented. The levels provided for the Murray Street bridge includes only the RL for the underside (+15.5) and for the top of the structure (+21.75). Assuming that the existing top of slab of the bridge is approximately 450-500mm above the underside, this results in a level for the existing bridge of approximately +16.0 and is 1.6m lower than the proposed upper level of Guardian Square.</p> <p>The area between Murray Street and the Pyrmont Bridge is graded, It is not clear if at the interface of the Pyrmont Bridge and the site, if the RL is +13.75 at the lower level of Guardian Square. However, the photomontages show that the lower part of Guardian Square is approximately one storey higher than the Pyrmont Bridge with a ramp up to this level of +13.75.</p> <p>There is a lack of equitable access demonstrated. There appears to be a lift at the end of the Murray Street Bridge in the photomontages and the indicative plan, but this is not shown in the building envelope drawings and it is not clear if this is a new or the existing lift. Stair access only will be limiting for those that are movement impaired or with prams and requires them to enter the shopping centre to access escalators and other lifts.</p>	<p>The proposed envelope has been developed to allow for an appropriate transition between Pyrmont Bridge, the adjacent Guardian Square and the proposed built form. The envelope allows for balustrades and varying soil depths to support a diversity of planting while maintaining flexibility for a future design excellence process.</p> <p>The lower level of Guardian Square is level to Pyrmont Bridge at RL11 and it ramps up to RL12.50 on the eastern waterfront edge, while the upper level relates directly to the Murray St Bridge and L2 at RL16.3. A multi level approach to Guardian Square is required if a connection to Murray Street is to be provided across Darling Drive. A footbridge has been retained in response to community and adjacent resident feedback.</p> <p>Within the illustrative scheme, a lift providing equitable access is provided at the end of the Murray Street Bridge and embedded in the proposed envelope drawings. See 'Appendix D - Architectural Drawings.' The final design proposal relative to equitable access will be subject to a future design excellence process, and will be subject to the normal statutory requirements.</p> <p>The building envelope drawings do not describe detailed elements as these are subject to a future design excellence process.</p>



/ Guardian Square with equitable access



/ Guardian Square adjacent to Pymont Bridge

Additional Response to Submission City of Sydney (R/2016/41/B)

Comments	Response
6. Public Domain	
<p>The comments raised in the City's previous response regarding the public domain remain unchanged. It is reiterated that the selection of external finishes to the public domain must be coordinated with those existing and proposed under the current Darling Harbour upgrade works. The use of Austral Verde for paving is not recommended due to the limits of supply of the stone. The City prefers Austral Black as a paving material in the CBD area as per the City of Sydney Streets Design Code.</p> <p>The following comments are made regarding the proposed public spaces:</p> <p>a. The Boulevard</p> <p>The existing harbour foreshore contains a variety of spaces of differing widths and characters along the harbour foreshore that reads as part of Darling Harbour and not part of Harbourside. The proposed upgrades to this space, referred to as 'The Boulevard', will remove this by creating a consistent width walkway that lays the current spaces, particularly the widened multifunctional space that faces east. This existing space addresses the need for hosting gatherings of people and events while providing key views that take in all of Darling Harbour.</p>	<p>Refer to 'Public Domain and Landscape Design Report (Appendix H)' prepared by Aspect Studios as part of the Response to Submission in October 2020.</p> <p>This has been addressed in 'Public Domain and Landscape Design Report (Appendix H)' prepared by Aspect Studios as part of the Response to Submission in October 2020.</p>
b. The Stairs	
<p>There are two east-west stairs proposed: The Ribbon Stairs, located at the northern end of the site, and the Event Stairs. The existing stairs located between the Pyrmont Bridge and Harbourside appear to be demolished as part of this proposal.</p> <p>The Ribbon Stairs appear to be a substitute for the existing stairs that run alongside the Pyrmont Bridge. These existing stairs offer independent access from the development and should be retained in addition to any new stairs incorporated as part of the development. The existing stairs also provide a purpose to the area between the bridge and the development. It is imperative that these stairs have a civic grade.</p> <p>The indicative design illustrates that the path to the 'Ribbon Stairs', and therefore down to the harbour from Pyrmont Bridge, is not directly aligned. This may result in difficult wayfinding and may make the connection less public in nature. A clear, direct path and line of sight should be formed between Pyrmont Bridge, the Ribbon Stairs, and the harbour. This may require a realignment of the steps.</p>	<p>The proposed envelope allows for flexibility in design as part of the Design Excellence process. This will be addressed as part of a Stage 2 DA.</p> <p>The requirement for these connections is embedded into the 'Public Domain and Urban Design Guidelines (Appendix I)' as prepared by fjmt and the 'Public Domain and Landscape Design Report (Appendix H)' prepared by Aspect Studios as part of the Response to Submission in October 2020. These elements will form part of the brief for the future design excellence process.</p> <p>The final alignment of the stairs form part of the brief for the future design excellence process and will be subject to a future DA approval. The current application is for a SSDA Stage 1 approval.</p>

Additional Response to Submission -
City Plan Strategy & Development P/L (P-20107 DR/CD)

Comments	Response
...It is noted that a small portion of the proposed podium's northern section has been reduced by approximately 1 – 2 storeys. Despite this amendment, view impacts from communal restaurants in both the Novotel and Ibis Hotel's towards the city skyline will remain severely impacted. In some cases, Darling Harbour water views will also be impacted. This is demonstrated by the proponent's photomontage analysis submitted as part of the revised scheme, extracts of which are in Tables 1 and 2 below. It should be noted that in some cases, the impacts are, in fact, greater than demonstrated below as several photomontages are depicted from at least 1 level above the restaurant floor levels (i.e. the restaurants are located on the ground floor whilst most photomontages are from levels 1 or higher).	<p>The proposed tower position and associated envelope has been positioned with an holistic consideration of urban design, environmental impacts (including wind and solar access), view sharing and public realm opportunities.</p> <p>View sharing improvements been addressed in 'Response to Submissions and Further Amended Concept Proposal' prepared by Ethos Urban for the Response to Submission in October 2020. Detail commentary on view sharing is included in the 'Visual and View Impact Analysis' as provided by Ethos Urban.</p>

Additional Response to Submission -
Goldsborough (P-20107 DR/CD)

Comments	Response
Views from the CBD: One of the reasons for visiting Pyrmont is its historic role in the development of Sydney. The position of the tower will further prevent tourists and others from seeing the one building visible and linked to this past: the Goldsbrough.	The proposed built form has been developed following the completion of a number of workshops between the Department and Mirvac. The outcome of which included proposed further refinements to the built form of the podium and tower. These refinements have accommodated improved view sharing from adjacent buildings, and has sought to retain an appropriate level of water, Pyrmont Bridge, and CBD skyline views by the positioning of the building footprints and configuration of the public domain spaces and connections through the site.
Depth of the Building: The depth of the tower is the major cause of loss of harbour views. We strongly recommend a depth of 40 m.	Refer to 'Further Amended Concept Proposal' prepared by Ethos Urban. Detail commentary on view sharing is included in the 'Visual and View Impact Analysis' as provided by Ethos Urban
Height of the Podium: The increased height of the podium destroys much of the water views of many of the 'mid-rise' units contrary to the statements made on page 24 of the JBA report. Included is a photograph taken from unit 1009. Please view Appendix A.	Sun eye analysis as prepared by fjmt illustrates that shadow impacts are limited to between 9.00am and 10.30am on June 21 and that affected apartments continue to receive well in excess of ADG requirements. Refer to 'Architectural Design Report (Appendix D)' page 62.
Overshadowing: The change in the location of the tower has had the most effect on the one building with historical significance, The Goldsbrough. The Ethos Urban report from Mirvac, 12/10/20states,“fjmt have taken a detailed sun eye view analysis of the potentially most affected residential building, being the Goldsbrough...”	

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