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24 September 2018

File No: 2018/487955 Our Ref: R/2018/12/A Your Ref: SSD 9347

Annie Leung NSW Department of Planning and Environment GPO Box 39 Sydney NSW 2000

Email: annie.leung@planning.nsw.gov.au

Dear Annie,

RE: Amending Stage 1 Concept Proposal (south site building envelope) Sydney Metro Martin Place (SSD 9347)

Thank you for your correspondence dated 20 August 2018 which invites the City of Sydney ("the City") to provide comment on the proposal.

The City made a submission to the Department regarding Sydney Local Environmental Plan 2012 Amendment No. 42 (submission dated 1 December 2017). The submission objected to the proposal and issues raised included:

- inconsistency with the Martin Place Special Character Area and long term vision for Martin Place;
- inconsistency with the proposed Central Sydney Planning Strategy;
- the reduced setback intruding on Martin Place views including the prominences of the GPO clock tower;
- the lack of side street building setbacks impacting on pedestrian amenity;
- proposed FSRs not being supported by robust analysis; and
- the proposal inappropriately using the 60 Martin Place development consent as a precedent for the South Site setbacks.

These issues remain unresolved within this application and therefore the City **objects** to the proposal in its current form.

In lieu of incorporating the Planning Assessment Commission's (PACs) recommendations regarding street frontage conditions along Elizabeth and Castlereagh Streets as part of the existing concept approval (SSD 8351), it is recommended that in amending the concept envelope and increasing the building mass of the south tower, building returns be incorporated in the southern corners of the envelope as a transition to the adjoining development to the south above the podium height. This would in part assist in achieving the outcome of the PACs' advice of reinforcing the importance of the urban character and integrity of Martin Place and the associated city blocks. A return of 8m x 8m is recommended for each corner for the tower above a nominal 45m podium height.

An attached diagram from the proposed concept envelope illustrates this recommendation.





Pedestrian Amenity

The Wind Environment Study prepared by CPP for the proposal indicates that locations around the site (17-19, 23-26) would experience increased wind speeds as compared to the existing concept envelope. As noted in previous submissions to the existing concept envelope, design options that retain the current comfort ratings (including the consideration of weather protection) should be considered.

Should you wish to speak with a Council officer about the above, please contact Shannon Rickersey, Senior Planner, on 9265 9333 or at srickersey@cityofsydney.nsw.gov.au.

Yours sincerely,

Graham Jahn AM **Director**

City Planning I Development I Transport