



12 September 2018

Director Key Sites Assessments
Planning Services
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Sir/Madam

Submission in Response to Proposed Pitt Street North Over Station Development (SSD 18_8875)

We act on behalf of the NSW Masonic Club, owners of 169-173 Castlereagh Street, Sydney in response to the proposed Pitt Street North Over Station Development (SSD 18_8875). The site subject to the proposed Over Station Development (OSD) is located on the adjoining southern boundary of the NSW Masonic Club. We have reviewed the exhibited documentation and are generally supportive of the proposal and understand the need for the Sydney Metro project and the associated OSDs. However, there are numerous issues identified in the design of the proposal and as such, the current design would generate significant amenity impacts to the existing Masonic Club and would result in a poor urban design outcome.

We are of the view that for the proposed Pitt Street North Over Station Development to achieve design excellence, there needs to be an increased building separation between the NSW Masonic Club. This will provide improved light, ventilation and outlook from the historically significant Cellos Grand Dining Room and the above hotel rooms.

This submission provides a brief background to the existing uses, operational details and heritage qualities of the existing building at 169 Castlereagh Street, Sydney. This submission also outlines the main concerns associated with the proposed development and provides various recommendations requested to mitigate potential impacts to the NSW Masonic Club. These concerns are summarised below;

- Building separation
- Design excellence
- Heritage
- Acoustic and vibration
- Construction
- Economic impacts

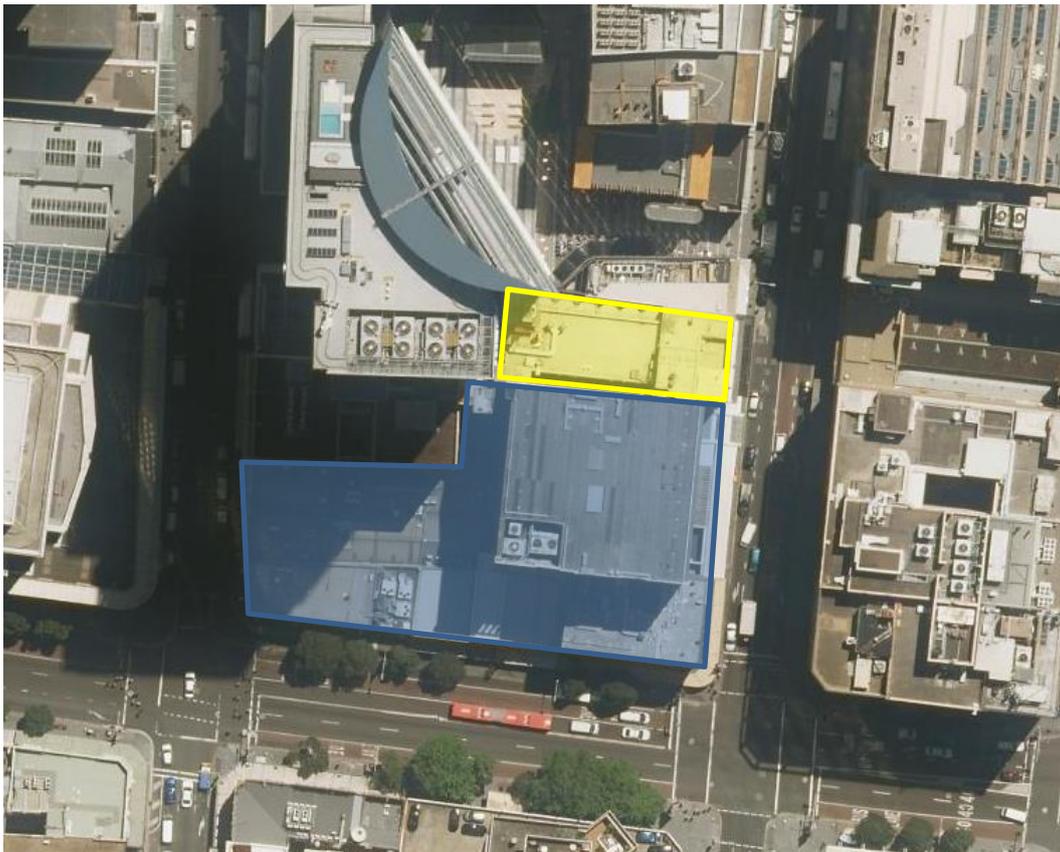


Figure 1: The proposed OSD shown in blue and the NSW Masonic Club shown in yellow

The NSW Masonic Club and Castlereagh Boutique Hotel

The building commenced construction in 1925 and was opened on 12 September 1927 and is located directly north of the proposed OSD. It is comprised by various uses including the NSW Masonic Club, the Castlereagh Boutique Hotel and other commercial and education uses. The NSW Masonic Club is celebrating its 125th year anniversary this year being established in 1893. In detail, the building incorporates the following:

- Basement- services, storage, full laundry operation
- Ground Level- Two retail shops, hotel lobby, The Reagh Bar
- Level 1- Administration, boardroom, conference room
- Level 2- Meeting room, lounge and bar
- Level 3- Conference centre
- Level 4- Cellos Grand Dining Room, function room
- Level 5- Meeting room
- Levels 6 to 11- Hotel comprising 83 rooms and suites

The hotel operates a 24/7 reception with food and beverage offerings, trading daily between 7am and 11pm, subject to functions. 58 people are employed across the site and the building is primarily used by Club Members and for short term accommodation and functions and meetings. The hotel generally has an occupancy rate of 84% and an average of 25,500 night stays per year in the 2017 to 2018 financial year.

The building is identified as a heritage listed item under the Sydney Local Environmental Plan 2012 as I1699, Community building 'Masonic Club' including interior (167-173 Castlereagh Street) and is described as *"A fine example of the Interwar Commercial Palazzo style. It is a twelve storey sandstone building, symmetrical in its massing with three distinct sections that are fundamentally classical in composition."* Refer to the Heritage section later in this submission for further discussion on the heritage implications of the proposed Pitt Street North OSD.

The following is a selection of photographs of the NSW Masonic Club, demonstrating the building's heritage qualities, social significance and its relationship to the adjoining OSD proposal.

Figure 2 below shows the existing NSW Masonic Club exposed following the demolition of the previous buildings. In Figure 3, the larger windows shown in the red arrow relate to the Level 4 Cellos Grand Dining Room. The above windows visible in this photograph are the south-facing hotel rooms.

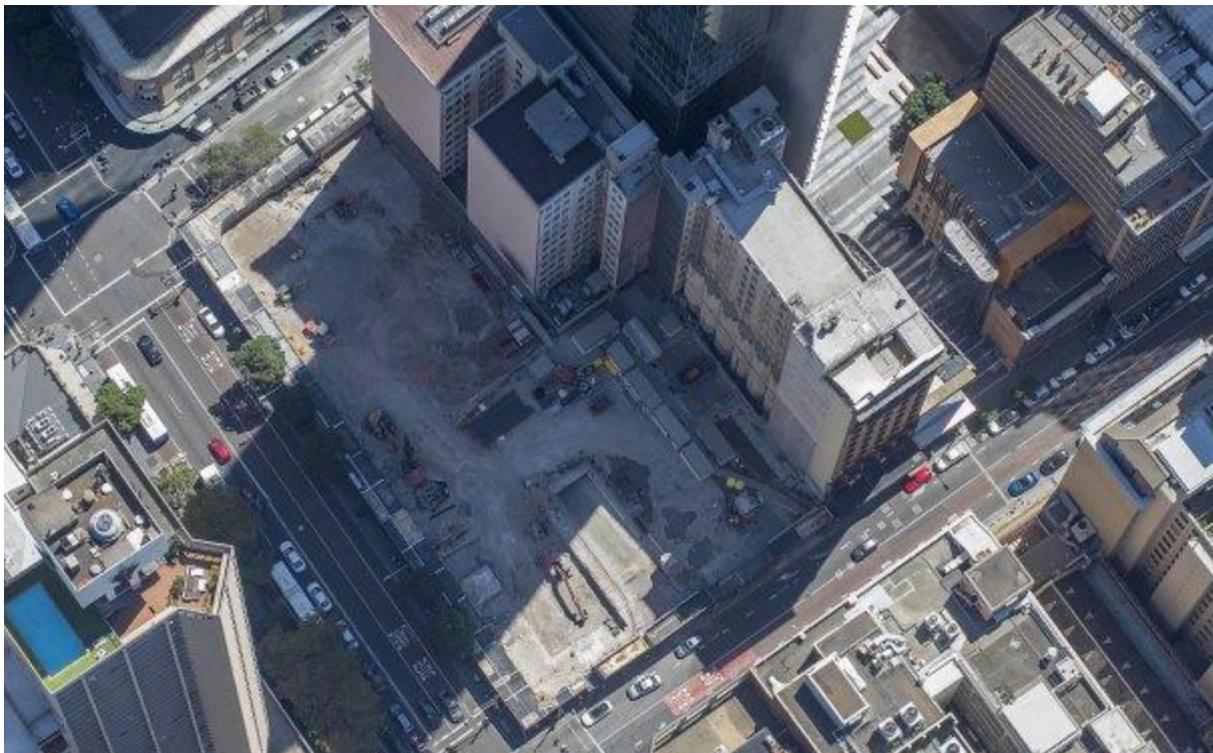


Figure 2: Aerial view of the OSD site in relation to the NSW Masonic Club



Figure 3: View of the existing Masonic Club showing southern facing windows (Sydney Metro)

Figure 4 below shows the NSW Masonic Club in relation to the ANZ Tower, a building of some 42 storeys. This demonstrates the scale sought by the proposed 43 storey building as part of the Pitt Street North OSD.



Figure 4: Southern view of the Masonic Club in relation to the ANZ Tower and The National Building (Sydney Metro)

Figure 5 below depicts an appropriate building separation between the site and adjoining ANZ Tower & Liberty Place development. This shows the Cellos Grand Dining Room windows are exposed to the northern sun. This sensitive design approach is contrary to the southern boundary where the proposed OSD will completely block sunlight with negligible setbacks.

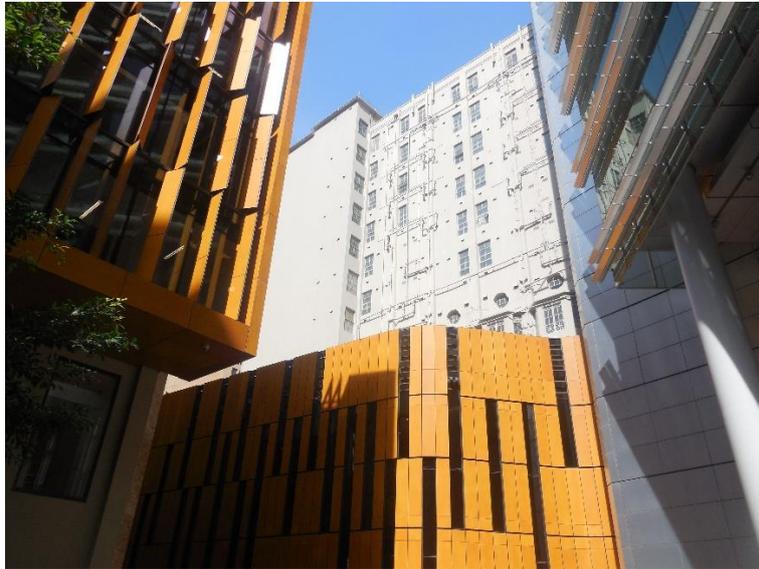


Figure 5: Northern view of the NSW Masonic Club from Liberty Place



Figure 6: Former Social Hall on Level 2, 1934



Figure 7: The Cellos Grand Dining Room prior to demolition of southern buildings
Note the left windows face Liberty Place to the north and show sunlight, but the right windows block sunlight facing the southern buildings.



Figure 8: Photo showing both north (shown on the right) and south windows are exposed, providing ample natural sunlight to the historically significant dining hall

The Proposed Development

The proposal seeks approval for the Pitt Street North Over Station Development (OSD) with a building envelope of up to 43 storeys including a 12 storey podium, a proposed FSR of 15.59:1 (49,120sqm) for the OSD component to form a total of 15.97:1 (50,310sqm) including the station floor space. The proposal incorporates various uses including commercial office space, a hotel, residential accommodation and a car park across five levels of the podium for 50 car spaces.

We note a previous submission was prepared by Urbis on behalf of the NSW Masonic Club, dated 27 June 2016, in response to the Sydney Metro City & Southwest- Chatswood to Sydenham Environmental Impact Statement (SSI 15_7400).

At the time of this submission, there were no building envelopes proposed, although the submission identified various issues including acoustic and vibration, structural engineering, geotechnical, air quality, and operational impacts to the NSW Masonic Club. The submission was accompanied by various consultant reports that provided recommendations to mitigate any potential impacts to the heritage listed building. The submission also recommended *"a 6m setback was required for any above-ground development. Such a setback would enable the preservation and enhancement of the heritage listed building."*

In the current proposal, there appears to be an attempt to provide some setbacks between the OSD and the NSW Masonic Club but at a higher level. This setback does not assist with improving light into the southern facing windows. The architectural plans provided indicate the proposed OSD will be built to the northern boundary up to the top of the NSW Masonic Club building when viewed from Castlereagh Street.

Figures 9 and 10 below show the proposed Pitt Street North OSD in relation to the NSW Masonic Club.



Figure 9: Eastern elevation showing proposed OSD and the NSW Masonic Club in blue

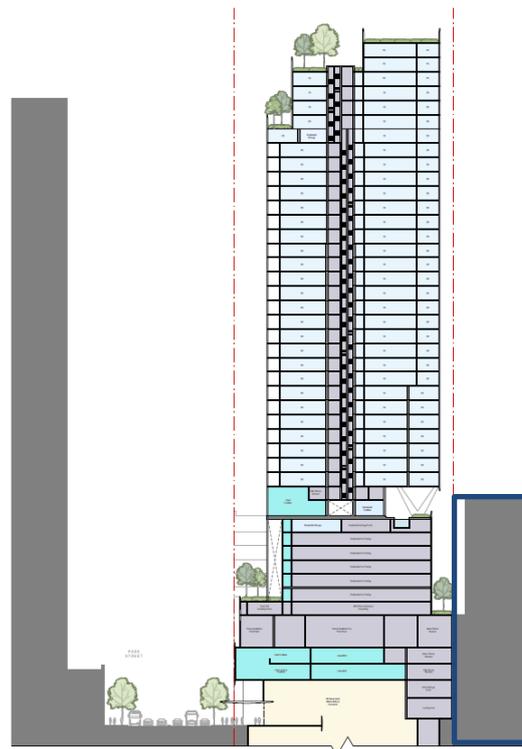


Figure 10: North-South Section showing proposed OSD and the NSW Masonic Club in blue

Building Separation

As discussed above, the NSW Masonic Club acknowledges the need for the proposed OSD adjoining their site subject to a complimentary building envelope. During the design stage there has been a disregard for introducing an adequate setback between the southern walls of the NSW Masonic Club and the proposed five storey podium. When viewing the two properties from Castlereagh Street, the podium adjoins the sandstone façade of the NSW Masonic Club, creating a frontage expected within the high density urban context of the Sydney CBD.

When examining the North-South Cross Section in more detail, Figure 11 below portrays our client's site as having a nil setback up to the fifth/top level of the proposed podium. It also does not show the corresponding uses of the floors of the NSW Masonic Club. As demonstrated in Figures 9 and 10 above, this is not the case as the setback extends down to the basement level of the building. Consequently, the section provided is inaccurate and does not present a true representation of how the proposed OSD interacts with the southern elevation of the NSW Masonic Club.

According to our measurements, the existing setback between the southern alcoves of the NSW Masonic Club and the southern boundary is approximately 1.6m. From windows associated with the hotel on levels 6 and above, the setback is approximately 2.6m. On the proposed level 5 of the OSD, there is an approximate 5m setback to the northern boundary. As such, there is a maximum building separation of approximately 7.6m between the two buildings.

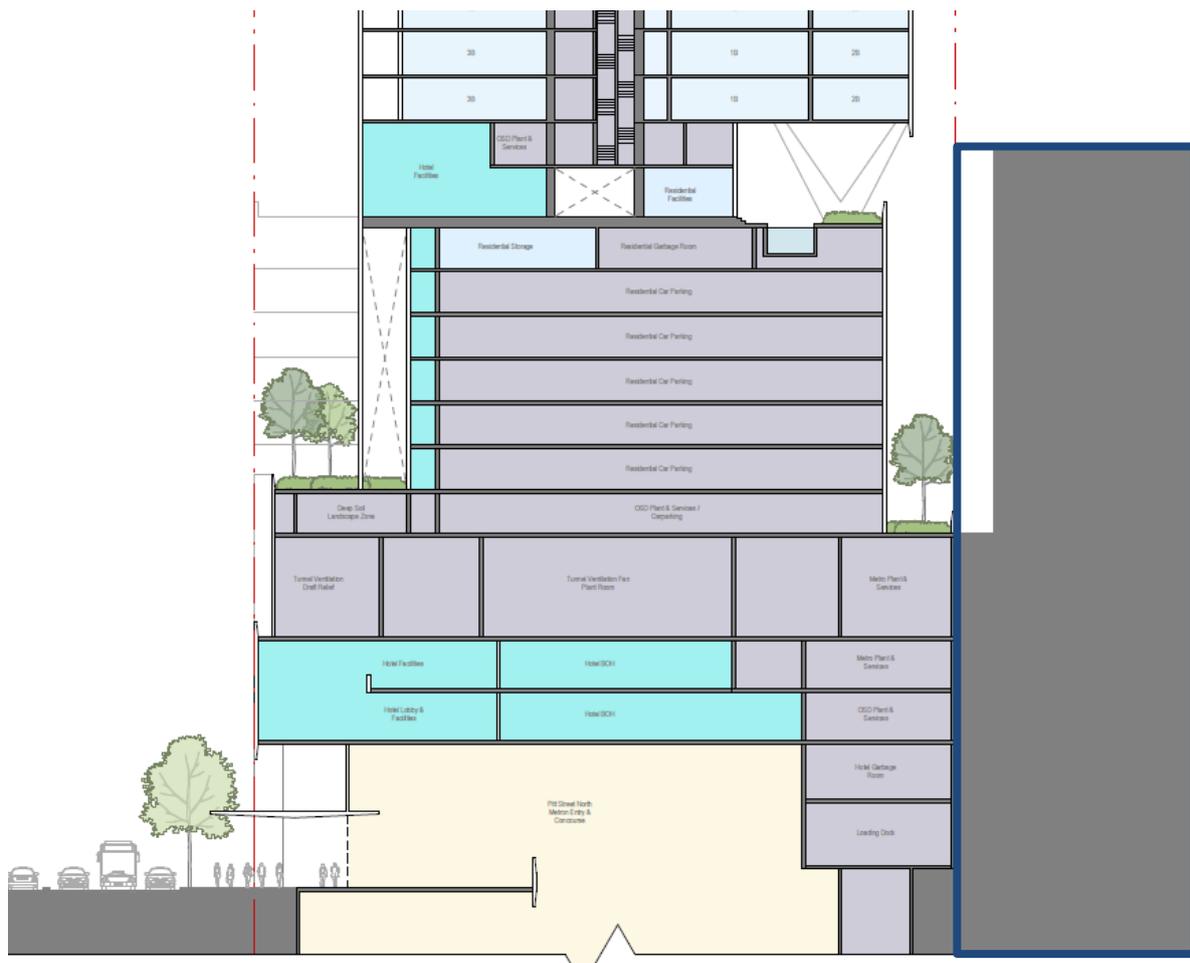


Figure 11: Closer North-South Section showing inaccurate relationship between NSW Masonic Club

In the applicant's documentation, an assessment of the proposal against the NSW Apartment Design Guide (ADG) is provided. Relevant to the NSW Masonic Club is the required building separation to ensure there is a lightwell provided between the proposed OSD and the southern facing windows.

Objective 3F-1 states; *Adequate building separation distances are shared equitably between neighbouring sites, to achieve reasonable levels of external and internal visual privacy*

Under the ADG, residential buildings which are higher than nine storeys are subject to the following minimum separation distances:

- 12m between habitable rooms / balconies
- 9m between habitable and non-habitable rooms
- 6m between non-habitable rooms

The design guidance in the ADG also specifies the following;

For residential buildings next to commercial buildings, separation distances should be measured as follows:

- *for retail, office spaces and commercial balconies use the habitable room distances*
- *for service and plant areas use the non-habitable room distances*

As such, the proposed Pitt Street North OSD adjoins a commercial building and a building separation of between 6m and 9m should be adopted. The levels of the podium correlating to approximately half the height of the NSW Masonic Club are being identified for car parking and not for residential use under this design. However, there is no certainty that a future application will not propose residential use within this podium level. Additionally, the requirement to install two car lifts to access the car parking levels is highly restrictive and whether car parking is proposed at all for the site will be up to the developer selected for the project. The proposed parking would create noise and visual impacts from the southern facing windows of the NSW Masonic Club.

The current design provides a setback of approximately 5m to the northern boundary from podium level 5 up to level 12. The existing building setback between the NSW Masonic Club and the southern windows associated with the hotel is approximately 2.6m. Subsequently, the total building separation will be 7.6m, considered to be a suitable distance to achieve improved amenity for the Cellos Grand Dining Room and above hotel rooms. The minor encroachment recommended to the current building envelope is insignificant in relation to the site's size of 3,151sqm and overall scale of the 43 storey development.

The EIS also provides the following recommendation in response to the ADG amenity requirements.

9.6.1 Recommendations

The future detailed SSD Application would need to provide a detailed assessment and justification of the level of amenity provided within future residential apartments, including a more detailed assessment of the proposal against the relevant provisions of the SEPP 65 and the ADG.

In addition to assessment of internal amenity for the future residential apartments, consideration of the amenity of the Cellos Grand Dining Room and hotel rooms above, needs to be incorporated in the future SSD Application.

We understand there were four development options considered for the site as detailed in Appendix F: Built Form and Urban Design Report. However, none of the four options have incorporated any building separation on the five podium levels between the OSD site and the Masonic Club. The focus of the design is evidently on the building's presentation to Pitt Street, Park Street and Castlereagh Street. **Unfortunately, the OSD's most affected neighbour at 169-173 Castlereagh Street was not adequately considered in the selected development option.**

Within the Built Form and Urban Design Report it identifies site constraints and opportunities in relation to the NSW Masonic Club as follows:

The site is surrounded by a number of heritage items, particularly adjoining the site to the north (NSW Masonic Club and Ashington Place) and the Consolidated Press facade, Great Synagogue and St James Trust group to the east. These heritage items influence street wall heights and treatments to their interface. Opportunities may exist to vary tower setback planning controls adjoining these northern heritage items with no resultant loss of amenity.

Strict compliance with the ADG building separation design criteria is not proposed beyond podium level 5. Prior to the demolition of the building at the OSD site, the amenity to the Cellos Grand Dining Room and hotel rooms was restricted due to the lack of building separation. Given that the proposed OSD is being designed based on a Design Excellence Strategy and the current State and Council planning controls, there is now a once in a lifetime opportunity to improve the amenity and establish a sensitive setback for the heritage listed NSW Masonic Club.

The current setbacks between levels 5 and 12 (Roof level) on the podium already exhibit a variation to the ADG separation criteria, although the club is prepared to maintain the proposed 7.6m building separation between the common boundary across the length of the southern facing windows. The proposed nexus of the façade of the buildings is generally acceptable from a streetscape and heritage perspective.

In relation to hotel integration the report reads:

Along the northern boundary, the form is set back to provide relief and respond to the adjacent Ashington Place and NSW Masonic Club. This creates large layered landscaped courtyards between guest rooms.

As discussed above, there will be a nil setback to the northern boundary from the ground level up to podium level 5. The proposed development incorporates five levels of car parking corresponding to the hotel rooms of the NSW Masonic Club/Castlereagh Boutique Hotel. The outdoor area associated with the podium level is in line with the top two levels of the hotel rooms. We understand the intention of this outdoor area is to provide amenity for the future residents/hotel guests, although further details are required to be provided demonstrating the potential overlooking impacts between the proposed building and the NSW Masonic Club. Details such as privacy screens and landscaping should be incorporated in any future application to allow our clients the opportunity to ascertain whether the privacy of the hotel guests can be preserved.

In relation to building separation, constructive discussions between the NSW Masonic Club and the ANZ Tower took place in order to achieve a suitable balance between the two buildings. Liberty Place is a high quality urban design outcome which maintained reasonable setbacks and preserved the heritage character of the NSW Masonic Club. Refer to Figure 5 above showing Liberty Place. As such, the NSW Masonic Club would welcome the opportunity to discuss the design of the OSD in more detail to ensure amenity and heritage impacts can be mitigated, and opportunities for increased setbacks can be adopted in the design. Furthermore, an increased building separation of 7.6m would certainly improve amenity to the NSW Masonic Club as well as maintain the heritage significance of the 91 year old building.

Within the SEPP 65 Compliance Analysis provided, the applicant provides an assessment of the proposal in relation to the nine principles.

Principle 1: Context and neighbourhood character

Good design responds and contributes to its context. Context is the key natural and built features of an area, their relationship and the character they create when combined. It also includes social, economic, health and environmental conditions. Responding to context involves identifying the desirable elements of an area's existing or future character. Well-designed buildings respond to and

enhance the qualities and identity of the area including the adjacent sites, streetscape and neighbourhood. Consideration of local context is important for all sites, including sites in established areas, those undergoing change or identified for change.

Response: The OSD projects being rolled out by Sydney Metro are confronted by the challenge of integrating tall residential and commercial towers adjoining heritage listed buildings. This is evident in relation to the proposed Victoria Cross (North Sydney), Pitt Street South and Martin Place North and South projects. With regards to the Pitt Street North OSD, there has been an attempt to articulate the proposed buildings using a podium and tower above in response to the NSW Masonic Club. However, the building separation does not extend between the ground level and level 5 of the podium.

As far as the streetscape is concerned, continuation of the horizontal building elements of the NSW Masonic Club to the proposed building and sandstone should be further considered in any future application. Accordingly, the design fails to achieve this principle.

Principle 2: Built form and scale

Good design achieves a scale, bulk and height appropriate to the existing or desired future character of the street and surrounding buildings. Good design also achieves an appropriate built form for a site and the building's purpose in terms of building alignments, proportions, building type, articulation and the manipulation of building elements. Appropriate built form defines the public domain, contributes to the character of streetscapes and parks, including their views and vistas, and provides internal amenity and outlook.

Response: Similar to our concerns with how the proposed OSD can achieve the context and neighbourhood character principle, the design and publicly exhibited documentation focus on the building's presentation to all three streetscapes, however disregards the interface between the northern boundary between then NSW Masonic Club. Further details should be provided demonstrating how the proposal can achieve a 7.6m building separation across the length of the south facing windows (approximately 21m), incorporating proportionate building elements and articulation.

Recommendations:

- Provision of a 7.6m building separation on the proposed ground level up to the podium terrace on level 12, consistent with the ADG design criteria. This should apply only to the central part of the building with a length of approximately 21m along the south facing windows.
- Along the northern elevation of the proposed podium, reflective material is to be incorporated in the design to maximise indirect light into the Cellos Grand Dining Room and hotel rooms above. This will create a lightwell.
- More details are to be provided in the architectural plans of any future application showing the relationship of the NSW Masonic Club and the horizontal elements of the proposed OSD building. 3D perspectives will also assist with refining the design to ensure our recommended setback can be maintained.
- Corresponding floor plans, elevations and sections (including RLs) of the NSW Masonic Hall will assist in establishing a suitable nexus between the two buildings.

- Details such as privacy screens and landscaping should be incorporated in any future application to understand whether the privacy of the Castlereagh Boutique Hotel guests can be preserved.

Design Excellence

Throughout the documentation exhibited to the public, the focus of the Pitt Street North OSD is to ensure design excellence can be achieved. There are various policies that have been considered in the design, including the Design Excellence Strategy prepared by the applicant, the Better Placed design policy published by the NSW Government Architect in September 2017, the draft Design Excellence Competition Guidelines, and the design excellence provisions under Clause 6.21 of the Sydney Local Environmental Plan 2012.

Clause 6.21 of the Sydney Local Environmental Plan 2012 appears below;

(4) In considering whether development to which this clause applies 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.*

Recommendation:

- Design excellence should be achieved through previous recommendations mentioned above and specifically in relation to the following provisions under Clause 6.21 of the Sydney LEP 2012;

(4)(d)(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,

(vii) environmental impacts, such as sustainable design, overshadowing and solar access, visual and acoustic privacy, noise, wind and reflectivity,

Heritage

The site owned by the NSW Masonic Club is identified in the Sydney Local Environmental Plan 2012 as I1699, Community building 'Masonic Club' including interior (167-173 Castlereagh Street) and is described as "A fine example of the Interwar Commercial Palazzo style. It is a twelve storey sandstone building, symmetrical in its massing with three distinct sections that are fundamentally classical in composition."

The building's statement of significance reads as follows:

The Masonic Club is significant as a fine example of the Inter-war Commercial Palazzo style. It is a twelve storey sandstone building, symmetrical in its massing with three distinct sections that are fundamentally classical in composition. Designed and built by the Masonic Lodge in 1925, it is socially and historically significant for its continued associations with this nationally influential social organisation. Its skilfully designed sandstone façade is an important contributor to the streetscape and reflects an important period of urban growth during the 1920s. Its interiors are both aesthetically and historically significant. The double volume main Dining Room is a fine example of a classically derived interior pertaining to the Gentleman's Club and features large recessed arched windows and a plaster ceiling with a deep, elaborate cornice incorporating classical dentils. The conversion of the upper levels to hotel type rooms reflects a growing need in the city during the later decades of the twentieth century.

The NSW Masonic Club is only two interwar Gentlemen's Clubs remaining in Sydney. As such, the building conveys significance importance to the club members. It should be recognised that the building does not just hold social significance for members, it is also used as the Castlereagh Boutique Hotel for over 25,000 international guests and hosts various functions for thousands more people.

In accordance with the building's Conservation Management Plan, there are plans to open the lower southern windows from Ground Level up to Level 3 in order to restore light into the main function areas of the building. Management are considering installing shields to the southern windows to direct morning sunlight into the hotel rooms. There are also plans by the building's management to acoustically treat the hotel room windows in anticipation of the proposed construction work associated

with the station development. Other long-term plans include concealing the pipes running down the northern and southern elevations to improve the building's heritage character.

In the applicant's submitted Heritage Impact Statement, it discussed the proposal's heritage impact to the Masonic Club. In response to the guideline of "Will the public, and users of the item, still be able to view and appreciate its significance?" the response from the applicant reads:

"As anticipated in the original design of the early twentieth century adjacent heritage items, the side walls of the National Building and Masonic Club will be hidden and side views lost. Significant views to the facades of these buildings will be retained for public appreciation."

As discussed above, the preservation of the heritage character of the building and suitable building separation were achieved through the ANZ Tower and Liberty Place development. The previous building on the OSD site was built to the boundary, however we are of the view that now is a once in a lifetime opportunity to improve amenity by providing a 7.6m wide building separation.

As part of the proposal's heritage mitigation measures, we agree with the following recommendation in the submitted Heritage Impact Statement:

Future development application(s) should include detailed streetscape elevations that extend to the heritage items on Pitt Street and Castlereagh Street to ensure contextual impacts of the development can be assessed and understood. The Castlereagh Street frontage of the podium should respond to major horizontal and vertical elements of the former Masonic Club. This should include, in particular, the second and third floor cornices of the former Masonic Club as well as the upper cornices.

Recommendations:

- Adopt the recommendations provided in the submitted Heritage Impact Statement prepared by GML Heritage
- Refer to the attached submission prepared by Weir Phillips Heritage for further analysis of the site's heritage significant and the proposal's heritage implications to the NSW Masonic Club.

Noise and Vibration

The proposed development incorporates parking for approximately 50 spaces located across five levels of the podium. These car spaces will be approximately 7.6m from the Castlereagh Boutique Hotel windows and this could give rise to unacceptable levels of noise from cars manoeuvring throughout the car park on steel float concrete. The proposal also incorporates plant rooms in close proximity to the hotel rooms which could give rise to noise impacts for guests.

Recommendations:

- Construction noise and vibration impacting the NSW Masonic Club is to be controlled by the various conditions of consent.

- On-going noise generated by the nearby aboveground car park should be minimised through acoustically treating the proposed car park.

Economic Impacts

There are two stages envisaged when there will be economic impacts to the Club; during the construction of the proposed OSD and the on-going impacts. In relation to the adjoining ANZ Tower, completed in 2013, the club experienced a 20% reduction in patronage during the construction stage. While the Club recognises the need for the proposed OSD and the overall Sydney Metro project, there will be significant economic impacts to the NSW Masonic Club. There will also be a delayed loss of business due to social media and online reviews. It is acknowledged that a recent class action was filed in the NSW Supreme Court for businesses affected by the light rail construction, situated approximately 200m from the site.

In relation to the on-going use of the OSD, the proposal incorporates an indicative layout of approximately 200 hotel rooms, which we understand will be further refined during the next stage of the public exhibition for this project. Competing interests will likely impact the patronage to the Castlereagh Boutique Hotel. Refer to the attached letter from the NSW Masonic Club including statistics over the 2017-2018 financial year, demonstrating the proposal's potential economic impacts.

The building currently comprises some 83 rooms and suites, most with northerly and southerly aspects. We therefore request that to ensure the continued viability of the Club and its services, that existing access for patrons and staff is maintained throughout the construction process of the OSD.

Recommendations:

- Economic impacts of the proposed OSD on the viability of the hotel and club uses need to be taken into consideration.
- Transparent and on-going consultation with the management of the hotel is necessary to ensure the existing businesses supporting the NSW Masonic Club can remain viable and relevant during the construction stage and post-construction.
- Due to the extent of the direct impacts to the NSW Masonic Club, including loss of sunlight, noise and loss of income, the Sydney Metro should consider some form of compensation to the club, including improving the southern façade.

Construction

The submitted Preliminary Construction Management Statement details three possible staging scenarios for the construction of the metro station and OSD. We understand the construction traffic management principles outlined in the City and Southwest Metro Construction Traffic Management Framework (CTMF) are those that will apply to Integrated Station Development (ISD) construction. As such, any measures to mitigate any potential impacts to the NSW Masonic Club during the construction stage need to be adopted. Further consideration of construction related impacts would occur as part of the detailed State Significant Development (SSD) Application.

Recommendation:

- The proposed development is to ensure compliance with the relevant construction traffic management principles and other relevant requirements in association with the Pitt Street OSD.

Conclusion

Based on the above, the NSW Masonic Club, owners of the adjoining building at 169-173 Castlereagh Street, Sydney, are generally supportive of the proposed Pitt Street North Over Station Development. There are however various concerns, primarily relating to the proposed building separation, which we believe is inadequate.

Four development options considered for the site, however none of the four options have incorporated any building separation on the five podium levels between the OSD site and the Masonic Club. The proposal represents a design inconsistent with the heritage objectives to preserve the significance of heritage listed buildings, such as the 91 year old NSW Masonic Club building. The proposed building is also not considered to achieve design excellence and will create an undesirable amenity impacts towards the historically significant Cellos Grand Dining Room and the above hotel rooms.

The key recommendation to provide a 7.6m building separation between the proposed podium and NSW Masonic Club is central to the design. Such a minor encroachment recommended to the current building envelope is insignificant in relation to the site's size of 3,151sqm and overall scale of the 43 storey development.

On this basis, we do not support the proposed OSD in its current form and object to it. In assessing this application, the Department of Planning and Environment is requested to further consider the impacts to the NSW Masonic Club including the issues and recommendations described above. We would welcome the opportunity to discuss our concerns with the relevant officers to ensure our above concerns and recommendations can be accommodated. Should you have any questions, please do not hesitate to contact either Mr Paul Brasch, General Manager of the NSW Masonic Club on 9284 1000 or myself on 8355 7108.

Regards



Eli Gescheit
Director