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Dear Amy,

### **Concept Proposal for the Over Station Development at Martin Place Metro Station (SSD 8351) – Response to Submissions**

Thank you for your correspondence dated 19 September 2017 which invites the City of Sydney (“the City”) to review the Response to Submission (“RTS”) provided by Macquarie Corporate Holdings Pty Ltd in respect of SDD 8351 and to provide final comments on the proposal.

It is noted that the proposal has not been revised but that further information has been included to refine the illustrative scheme.

The City has reviewed the RTS provided and continues to **maintain its objection** to the application in its current form. The City maintains its objections raised previously in the letter dated 29 June 2017 and in particular identifies the following matters to be of key significance in the assessment of the proposal:

#### **Overshadowing**

It is noted that the RTS indicates that the proposal will comply with both the Martin Place and Hyde Park Sun Access Planes.

The RTS has also provided further shadowing plans that illustrate the impacts of the proposal with comparison between existing shadows, the proposed scheme, and an LEP and DCP compliant scheme. The plans demonstrate that there would be an increase in overshadowing when compared to an LEP and DCP compliant scheme.

The City objects to any additional overshadowing of Martin Place and to adjoining road reserves, beyond that of an LEP and DCP compliant scheme. This is an issue which demonstrates that the requirement to comply with the LEP standards in particular is not unreasonable or unnecessary.

#### **Pedestrian Amenity and Capacity**

The application needs to consider options for providing improved public pedestrian access on and around Hunter Street in coordination with SSI 7400 Mod 3. Widening of the footpath to Hunter Street to address capacity and amenity outcomes for the public, particularly station users, must be addressed.

The issues previously raised by the City in consideration of SSI 7400 Mod 3 to the northern entry are applicable to the reference scheme provided within the RTS as follows:

- the frontages to Castlereagh and Elizabeth Streets should be sleeved with retail to activate the street, with services located behind;
- the sloping frontage to Hunter Street must not be resolved with an awkward and/or unusable stair/seating structure.

Weather protection should also be provided at ground level station entry/exit points as part of an integrated design option. Daylight access to the public pedestrian areas should be outlined and assessed.

The Wind Environment Study provided within the RTS indicates that at station exit points wind speed would be increased compared to the existing wind environment. Design options that retain the current comfort ratings (including the consideration of weather protection) should be considered. This is caused by ignoring the setback requirements in the City's controls which are intended to address this issue.

### **Northern Tower - Interface with 48-50 Martin Place**

The north tower interface with the heritage building at 48-50 Martin Place requires further development to ensure an appropriate fit. The supplementary design report provided with the RTS continues to show large building mass directly adjacent to 48-50 Martin Place within the proposed building envelope.

The illustrative scheme through site link 'interlude' provided within the RTS design report requires further development and detailing regarding its relationship to 48-50 Martin Place and the public amenity it provides.

### **Southern Tower**

It is noted that the colonnade to Martin Place has been removed from the illustrative scheme. The refined illustrative scheme does not resolve concerns regarding the creation of ground floor setback spaces. A more defined street edge should be provided.

The 25m setback above 55m at the Martin Place boundary is essential to deliver the desired future character of the pedestrianised Martin Place. When the control was introduced it was not reflecting what was there, but was intended. Pedestrianisation of Martin Place commenced in 1971 on Block 1.

The provided 'Key Public View' and Shadow Analysis provided with the RTS do not provide adequate justification for the variation to the east and west tower setbacks required in Sydney DCP 2012.

Given that the response to submissions has failed to adequately address the concerns previously raised, the City objects to the proposal in its current form.

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](mailto:srickersey@cityofsydney.nsw.gov.au).

Yours sincerely,



**Graham Jahn AM**  
**Director**

City Planning | Development | Transport