

7 February 2017

File No: 2017/049179
Your Ref: SSD 7484

Brendon Roberts
Team Leader – Key Sites Assessments
NSW Department of Planning and Environment
PO Box 39, Sydney NSW 2000

Attention: Petra Blumkaitis
Email: petra.blumkaitis@planning.nsw.gov.au

Dear Petra,

RE: Stage 2 DA for tourist and visitor accommodation – The Sandstone Precinct, 23 – 33 & 35 – 39 Bridge Street, Sydney

I refer to your correspondence dated 14 November 2016 and notification of the above mentioned Stage 2 State Significant Development Application.

The application seeks consent for 'Stage 2 DA for tourist and visitor accommodation'. It follows the Stage 1 consent (SSD 6751) determined 25 August 2015 and the subsequent Section 96 modification currently on public exhibition. The Stage 1 consent granted approval for:

- adaptive reuse of the Lands Building and Education Building for tourist and visitor accommodation, and ancillary uses
- a building envelope up to RL 58.69 (approximately 3 additional storeys) above the Education Building
- an indicative subterranean building envelope below the Lands Building and Education Building, under Loftus Street, Farrer Place and Gresham Street.

The Section 96 modification seeks consent for:

- increase in the height of the approved Education Building envelope by 1.34m from RL 58.69 to RL 60.03
- introduction of a building envelope to the roof of the Lands Building
- amendment to the description of the development in Schedule 1 of the Stage 1 Development Consent (i.e. to amend the maximum height of the Education Building roof envelope)
- amendments to conditions A1, A4, B3, B4 and B14 in Schedule 2 of the Stage 1 Development Consent.

A formal objection to the Section 96 modification was submitted to the Department on 23 January 2017.

The proposed Stage 2 Development Application seeks consent for the following works:

- demolition of “existing improvements”
- alterations to the Lands and Education Buildings to facilitate their adaptive reuse
- hotel or motel accommodation with ancillary licensed food and drink premises and retail premises
- excavation and construction of three basement levels below the Education Building
- a subterranean link beneath Loftus Street between the two buildings
- construction of three additional levels above the Education Building to a height of RL 60.03
- removal of existing pitched roof elements and construction of a replacement roof structure on the Lands Building to a height of RL35.50
- provision of an external building illumination system
- associated utilities and infrastructure.

The City **strongly objects** to elements of the proposal. The basis for this objection is outlined in detail below.

Subterranean Tunnel

The application proposes a subterranean tunnel at Basement Level 3 between the Lands and Education Buildings beneath Loftus Street. The primary use of the tunnel is as a service corridor, allowing staff to service hotel suites within the Lands Building from the back of house facilities (i.e. housekeeping and laundry, hotel kitchen etc.) within the Education Building. The link is also proposed to include services infrastructure.

Landowners Consent

The applicant does not have the land owners consent required from the City of Sydney to make a development application in accordance with Clause 50 of the *Environmental Planning and Assessment Regulation 2000* for the part of the development which is located on Council land.

Agreement with The City in regard to Subterranean Tunnel

In its submission to the Department regarding the Stage 1 Concept SSD 6751, the City advised that “any Stage 1 consent granted should be granted on the basis that the development can function and be delivered with or without the use of subterranean space”. Accordingly, the Department imposed the following condition of consent:

Condition B8: “Future Development Applications that involve the development on any subterranean space within the public or road reserve shall include an agreement with the owner of this land for development of that space prior to the determination of the application”.

Despite this condition, the applicant has not entered into an agreement/lease/licence/commercial arrangement with the City of Sydney for development of the land. Consequently, the City **strongly objects** to this element of the proposal. The City notes that it has not entered into an agreement as required by conditions of consent nor given its owners’ consent for the proposal and therefore, to

the extent that it relates to the subterranean tunnel under the City's land, the application has not complied with the requirements of the *Environmental Planning and Assessment Regulation 2000*. It is recommended that the subterranean tunnel is deleted from the proposal at this stage and that amended plans are submitted until such time as Condition B8 is satisfied.

Any proposed changes to road infrastructure in order to facilitate above ground servicing will also require resolutions and approval from Council's Local Pedestrian, Cycling and Traffic Calming Committee (LPCTCC) and the Central Sydney Traffic and Transport Committee (CSTTC). Notwithstanding these requirements and given that this type of operation would occur within the public domain, the applicant shall also adequately demonstrate that the proposal is in the **public interest** pursuant to Section 79C(e) of the *Environmental Planning and Assessment Act 1979*.

Planning Pathway

The City maintains its position that "any future use of subterranean space beneath the public domain of Loftus Street, Gresham Street and Farrer Place is not state significant as it is outside the property boundaries of the Lands and Education Building". It is at variance with the Department's view to date that "the future proposed subterranean space... is directly related to the use of the building for tourist accommodation and therefore it is also deemed to be SSD" as stated within the Secretary's Environmental Assessment Report for the Stage 1 Concept SSD 6751.

Heritage

Inadequate information has been provided to assess the full extent of heritage impacts upon the Lands Building and Education Building. This is detailed below:

Conservation Management Plans

The Conservation Management Plans for Lands and Education buildings (CMPs) dated October 2016 by GBA Heritage need to be further developed prior to approval by the NSW Heritage Council and the City of Sydney:

- The physical survey and analysis of components and spaces is insufficient to fully assess the application or to inform a future schedule of conservation works. The CMPs should include a full physical survey and analysis of all significant spaces and their components. It is suggested that this survey and analysis be compiled into a table format with thumbnail images of each space. A more complex survey to accompany a schedule of conservation works, should be compiled in the form of an inventory sheet for each space. Such an inventory would include a photograph of each surface i.e. floor, ceiling, walls and provide analytic detail (description, date of origin, condition, and grading of significance) of significant components of each space such as joinery, plasterwork, flooring, and fixtures and fittings. The physical analysis should include key plans, sections and elevations of the building and notate key spaces within the actual report rather than just as an appendix.
- Historical analysis: Diagrammatic plans sections and elevations that represent the historical analysis of the buildings should be included, so that the origin of parts of the building are clearly represented.
- The gradings of significance of spaces and components (from the 2015 CMPs) are overly simplified, and are not clearly represented. These should

be re-appraised, and clearly represented diagrammatically on floor and roof plans, sections and elevations, and key spaces notated. These diagrams should be supported by more detailed written grading schedules that itemises important components. The city disputes some of the evaluation gradings.

- The policies need to be developed further and provide guidance for conservation works. Further, be based upon the amended gradings of significance of spaces and components once developed in more detail.
- All building levels nominated in the CMPs should equate to the architectural drawings to avoid the current confusion.

Architectural Drawings

- The RLs of the ridge of the existing original roofs proposed to be demolished are not included on any plans, elevations or sections. The height of the handrail has been included but this is a highly transparent element so that it does not provide a valid comparison with the height of the proposed envelope. The City has relied upon scaling to estimate that the proposed roof envelope is 1.8 to 2 metres higher than the ridge of the original roof.
- There is an insufficient number of sections through the building to understanding the inter-relationship of the proposed roof envelope with the existing roof features to be retained. Further there is no information in the Stage 2 drawings to enable an assessment of the internal heights in the proposed new roofs. Therefore, it is difficult to assess whether the proposed height of the envelope is necessary or whether it could be lowered.

Building Services Report

- There is no information on the height of the proposed exhaust from the rooftop kitchen and whether this projects vertically above the proposed envelope.
- The Building Services report does not verify that no further vertical projections for plant will be required other than for the Lift to RL 38.70.

Structural Report

- The NSW Heritage Council requested conditions requiring the proposed additional building envelope (Education) to be carefully designed and visually subservient, whilst maintaining the legibility of the existing light well as a central element with clear views to the sky.
- The Department is of the view that the precise setback (4m requested by Council) should be resolved at the detailed design stage having regard to the visual quality of the building and its relationship to the existing heritage fabric.

Design of fire safety, building services, structural and acoustic upgrades

- Further detail is required as to the fire, building services and structural concept designs.
- Inadequate detail has been provided on the proposed mechanical air conditioning systems, and further detail should be required as part of this assessment.
- The proposed hybrid solution for seismic strengthening adopting AS 3826-1998 as a minimum standard and meeting full compliance to AS 1170.4 for

critical sections of the structure will assist to limit heritage impacts compared to full compliance to AS 1170.4.

- The proposal entails the removal of all timber floors to install services and to perform seismic, fire, building service and acoustic upgrades. This is an irreversible change and is currently objected to and requires further assessment.
- The extent of heritage impacts upon the original timber and concrete floors to perform these upgrades is not fully documented:
 - The extent of the proposed removal of floor boards has not been indicated on plans of the building, this is required to assess the proposal. It is understood that the removal of floorboards is required to reinforce their performance as diaphragms with structural ply, to undertake seismic upgrades by fixing the steel floor beams and the timber joists to the walls, to install fire rating to the structural steel beams and timber joists and to provide set-downs for bathrooms.
 - The set-downs for bathrooms also entails the cutting down the floor joist depth from the top. Whilst potential flooding and trip hazards need to be avoided, alternatives to this were not fully explored. It is also understood that the floors are to be removed to allow the acoustic performance of the floor to be enhanced, by installing a new acoustically isolated floor board system over the ply diaphragm.
- The overall fire safety strategy is outlined in the proposal, and it is acknowledged that the 1 metre deep service voids under all access corridors provide an unusual level of flexibility for horizontal reticulation of main service feeds both for sprinklers and other building services. The following would assist the assessment of heritage impact:
 - Diagrammatic layouts of all the proposed main building services reticulation (sprinkler, mechanical, and sanitary drainage) overlaid on architectural plans and sections would assist to further explain the proposal. All proposed roof level exhaust systems for kitchens and plant need to be both drawn and notated on the plans so that the impact can be assessed. Refer to comments under 'Mechanical Ventilation'.
 - Plans indicating the areas of floors to be removed throughout the building to install services, to undertake seismic, fire and acoustic upgrades and to be lowered for bathrooms, details of their condition and details of the proposed new replacement floors.
 - The proposed methodology and architectural detail for the installation of tie rods to restrain the brick arch of the central corridor.
 - The omission of stair pressurisation to minimise heritage impacts is supported. However the fire safety strategy states that original stair openings within the stairs will be fitted with fire rated glass and original doors to the stairs replaced with fire doors. To assess the impacts, further architectural details of this approach are required.
 - The proposed deemed to satisfy resolution combining the hydrant/sprinkler booster and the Fire Control Centre (FCC) for both buildings at the loading dock entry off Loftus Street is supported.

The City acknowledges that the Lands building project entails substantive ongoing investigation and design resolution and requests future ongoing consultation on the resolution of all details, for instance:

- Further earthquake analysis including the development of the finite element earthquake model of the Lands Building and additional investigation to determine the make-up of the structure, involving the removal of floor boards and non-heritage linings to measure beam and columns sizes.

- Final architectural details of the balustrade upgrades.
- Details of the proposed lift installation within the Bent Street stair.
- Final details of the proposed Sesame lifts including the reinstatement of the original stone treads.
- Details of the resolution of corridors where original marble flooring is currently hidden under hardboard.
- Final resolution of all environmental, fire and acoustic upgrades to all doors and windows.
- Details and samples of the final proposed glazing and louvre panels, and structural stainless steel components of the proposed diagrid roof.

The Lands Building: Heritage Impacts

The proposed adaptive reuse of the main levels of the Lands department (Lower ground to Level 5) has been carefully resolved and is considered of high quality. The proposed full open public access to the Ground Floor of the Lands building is supported as is the proposed reduction in the footprint of the excavation approved in Stage 1. The proposed adaptive and conservation design details in the Design Report by MAKE are supported and should be developed into architectural design details, the final resolution of which should be approved by NSW Heritage Council and the City of Sydney prior to the issue of a Construction Certificate.

Notwithstanding the concerns itemised below, the City is supportive of a means of providing habitable spaces in a series of contemporary roof forms (such as that proposed) which link the significant rooftop structures and invigorate these structures for use as hotel function spaces. However, this is provided that the hierarchy of the roof scape is maintained and the perimeter roofs remain visually subservient.

Aspects of the proposal and/or documentation provided that is **not supported** is detailed below as follows:

- Insufficient analysis and heritage assessment has been provided to assess the heritage impacts of the proposed demolition. The Statement of Heritage Impact (S o HI) does not assess the impact of the demolition of the perimeter roofs (inherent in the proposed roof envelope) on the significance of the building. It justifies demolition on the basis that perimeter roofs are 'aesthetically disappointing'. Neither the CMP nor the S of HI provide an assessment of significance of the perimeter roofs (roof structure, form and cladding) under the NSW Heritage Council Assessment Criteria. Such substantive demolition of a building of State (and potentially, National significance), should not be approved without such an assessment.
- From views to the building in Bent Street and Farrer Place, the proposed 'gridshell' roof structure will obscure views of the octagonal base of the central dome and the southern mansard roof of the eastern tempietti dome, and reduce the visual prominence of the southern clock tower. The original perimeter roofs of the Lands Building were intentionally designed to be subsidiary in their nature and their scale so as to afford visual prominence and primacy to the major roof features and to the facades, part of a carefully choreographed hierarchy of forms that express the hierarchy of historic functions within the building. Further, the proposed roof structure will require abutments flashings to be chased into the exceptionally significant stonework of the clocktower. Whilst the architect's intention to provide a visual link between the two buildings through the use of stainless steel rooftop structures is acknowledged, it is recommended that the proposed roofs in the

southeastern corner of the building require further consideration to ameliorate adverse impacts on views to the building from the public domain of Bent Street and Farrer Place and enhance significant views to the Lands Department consistent with the SDCP 2012 objectives for the Farrer Place Special Character Area. More consideration should be given to retaining the original roofs in the southern half of the building.



Figure 1: View Analysis: Bent Street and Farrer Place. From views in Bent Street and Farrer Place, the proposal will obscure views of the octagonal base of the central dome and the southern mansard roof of the eastern tempietti dome, and reduce the visual prominence of the southern clock tower.

- There are insufficient RLs and sections through the building to understand the inter-relationship of the proposed roof envelope with the existing roof features to be retained or to enable an assessment of the internal heights in the proposed new roofs. These heights and interfaces need to be understood in order to undertake a full assessment.
- *Reflectivity:* Further analysis of the reflectivity of the 'diagrid' shell roof is required including the impact from higher levels within surrounding buildings.

Education Building: Heritage Impacts

The proposed adaptive reuse of the main levels of the Education Building from Lower ground to Level 5 has been carefully resolved and is supported. However, except in as far as the extent of demolition within the 1915 section of the building, and the roof top addition envelope that has been approved by the Department of Planning under the Stage 1 SSD 6751.

Notwithstanding the current objection to the proposal; the proposed design details in the Design Report by Make are supported and should be developed into architectural design details, the final resolution of which should be approved by NSW Heritage Council and the City of Sydney prior to the issue of the Construction Certificate.

Aspects of the proposal and/or documentation provided that is not supported is detailed below as follows:

- The level of demolition of original 1915 loadbearing masonry walls and the resultant loss of original room and configurations in the 1915 portions of the building is not supported. The demolition includes all original 1915 perimeter walls on the northern, eastern and western perimeters of the 1915 portion of the courtyard/light-well from Lower Ground to 5 (CMP levels 1 to 7). The extent of change to the original 1915 portion is considered unnecessary, and to the point that no original loadbearing walls that formed the light-well will remain to interpret the past. This demolition results in adverse impacts upon the character of the courtyard because the entirety of the original perimeter masonry walls with their fine steel framed window fenestration will be lost, compounding upon previous demolition and accretions undertaken over the past decades.

The internal demolition includes original 1915 internal masonry walls and spaces graded as being of exceptional significance including:

- The northern wall enclosing the Farrer Place entrance lobby, and the corridor extending north from this space, where portions of the original could configuration readily be retained, and
- The eastern wall enclosing the Loftus Street entrance lobby, where portions of the original could configuration readily be retained.

The Statement of Heritage impact should specifically address this demolition of fabric and spaces which is nominated as being of exceptional significance.

The internal demolition includes the original 1915 internal masonry walls and room configurations graded as being of moderate significance including:

- The splayed wall and the north south wall immediately to the west of the Bridge Street stair on the Lower Ground Floor (CMP level 1) (Bridge Street entrance level) where the original configuration could readily be retained alongside the proposed stair
- Walls and rooms on the northern, eastern and western perimeter of the 1915 portion of the courtyard/lightwell from Lower Ground to Level 5 (CMP Levels 1-7)
- The proposal demolishes the walls that formed the Bridge Street staircase through all levels of the building above Level 1. These wall should be graded as being of **high** significance whereas the CMP grades them as moderate.

The City advises that a far greater extent of these original 1915 masonry walls should be retained so as to interpret the original room configuration and to retain a portion of the original perimeter walls of the building exposed to view within the courtyard, interpreting its former character and proving a counterpoint between original and contemporary architecture. Where demolition of these walls is generated by the proposed excavation, the footprint of excavation should be reduced.

If this level of proposed demolition is approved and undertaken the original building becomes a shell supported by internal perimeter floor structures, with only a few of the original interior spaces remaining fully intact. The City describes the building in the SLEP 2012 Schedule 5 as 'Education building *including interior*'. Proper consideration has not been given in regard to the significance of the interior.

- The proposals for the Ministerial Boardroom (CMP Level 2, Ground floor in the architectural set) are not clear. This room has not been identified on plan, and

is not located on any plan in the CMP. There is insufficient detail in the CMP to clarify the existence of significant components within this space.

- Consideration should be given to the opportunity to interpret the original extent of the Bridge Street staircase up through the building above where it was formerly truncated at Level 2. Such an interpretation could include the re-introduction of a staircase which would re-establish the dramatic sense of space and re-establish daylight down through the space. Although less dramatic, it could also be reinterpreted as hotel rooms. It is noted on the preceding page that the proposed demolition of the walls that formed the Bridge Street staircase through all levels of the building above Level 1 is not supported. These walls should be graded as being of high significance whereas the CMP grades them as moderate. The spatial configuration should be retained and conserved and the staircase interpreted.
- The proposed reconfiguration of the courtyard, a space that is substantially graded as being of high significance, is not supported. The demolition of all perimeter walls of the 1915 building and the adjustment of the geometry of the entirety of the courtyard from a parallelogram to a rectilinear plan form is an unacceptable level of change. Whilst the geometry of the southern half of the courtyard could be adjusted, the northern half of the courtyard should closely interpret the 1915 geometry. Further, the proposed intrusion into the courtyard of hotel rooms on level 2, and all levels above, diminishes the footprint of the northeastern portion of the courtyard and has the potential to diminish the daylight levels within the courtyard. The overhang of these rooms will also inhibit light levels into the original Bridge Street staircase remaining up to Level 1. This aspect of the proposal requires further assessment based upon daylight studies of the courtyard and stair.
- Further detail is required as to the fire, building services and structural concept designs.
- The impacts of the proposed shear walls either side of the Loftus Street stair can only be assessed if architectural details of the integration of the shear wall with the original significant fabric are provided.
- Inadequate detail has been provided on the proposed mechanical air conditioning systems, and further detail should be required as part of this assessment.
- The proposed addition has been set back to enable the retention of the significant roof structures, and has been modelled into a grouping of rooftop structures. It appears to be thoughtfully and carefully designed. However there are a number of concerns as follows:
 - The strong verticality of the proportions established by the slumped glass bays of the southern extension requires greater horizontal relief to reflect the balance of horizontal and vertical proportions of the original facades below.
 - The height of the glazed bays of the southern extension is considerably higher than the 'entablature' of the palazzo form below, being Level 5, so appears to over scale the building beneath.
 - The scale of the slumped glass bays of the southern extension over-scales the bays and openings of the original facades below.
 - Further analysis of the reflectivity of the southern extension, and its impact on Farrer Place and surrounding areas is required.

Lands and Education buildings- Heritage interpretation and movable heritage collections:

Space or spaces for a rotating display of movable heritage items should be provided for within the buildings, in collaboration with the state government departments. The State Government Departments should retain an appropriate portion of their movable heritage collection within the buildings in accordance with the recommendations of the Movable Heritage Review, and an experienced movable heritage curator should be engaged to update the Musecape report into a Movable Heritage Collections Management Plan, preferably extending the list of items identified for retention and display within the building. The Movable Heritage Collections Management Plan should provide detailed recommendations on the future conservation management, display conditions, security and locations of each identified moveable heritage item. An experienced movable heritage curator should be engaged by the lessee and hotel operator to manage the collection and advise the lessee about its obligations regarding the heritage management framework and care of the movable heritage items. Alternatively the responsible State Government departments could provide for a curatorial position to curate these exhibitions, which should form part of a broader concept incorporating the Chief Secretary's building and its movable heritage. Ongoing consultation between the proponent and the State Government Departments is necessary to resolve the above matters.

Overshadowing

The shadow diagrams are unclear in defining the existing, approved (Stage 1) and proposed (Stage 2) overshadowing to adjacent sites, specifically 1 Bligh Street. Condition B1(b) of the Stage 1 consent (SSD 6751) requires that future development of the Education Building minimises potential overshadowing of the 1 Bligh Street steps during the core lunch period of 12 noon to 2pm in mid-winter.

The shadow studies fail to demonstrate how the proposal complies with the Stage 1 condition or clearly illustrate any further overshadowing caused by the additional height as sought by the Stage 1 Section 96 modification application.

Competitive Design Process

The Department's decision to waive a formal competitive design process under Clause 6.21 of the Sydney LEP 2012 did not incorporate an additional height increase to the Education Building or new addition to the Lands Building currently sought in the Stage 1 Section 96 Modification. The cumulative impacts of these additions, coupled with the building's heritage sensitivities, warrant the requirement for a competitive design process. As illustrated in the below pictures, the proposals will impact upon the public domain and will significantly alter the aspect of the buildings when viewed from public places.

It should be noted, the City maintains its objection to the Stage 1 Section S96 modification.



Figure 2: Education Building existing



Figure 3: Proposed Stage 1 S96



Figure 4: Proposed Stage 2



Figure 5: Lands Building existing



Figure 6: Proposed Stage 1 S96



Figure 7: Proposed Stage 2

Signage

Approval is sought for a signage zone on the right hand side of the Bent Street entrance. It is further requested that details of the proposed signage are submitted for approval to the Department and not require a further separate DA.

The City objects to any request to submit signage to the Department of Planning for “approval”. In addition to the proposed signage zone, the EIS makes several references to internal and external signage as part of conservation works. However, fails to specify the total number of signs visible from the public domain. Accordingly, it is recommended that a separate Signage Strategy is prepared for the sites. Furthermore, that all externally proposed signs are assessed by way of a Development Application to the City as per the proponent’s current application D/2016/1641.

VPA

No agreement with The City has been reached in regard to this matter. In addition, a development contribution is payable under Section 61 of the *City of Sydney Act 1988*.

HFS

The Sydney LEP 2012 includes an incentive to conserve and maintain whole buildings in Central Sydney which are heritage items within Schedule 5 of the Sydney LEP 2012. This includes The Lands Building and Education Building.

The incentive is an award of Heritage Floor Space (HFS), equal to a portion of unused development potential from the site (FSR) that can be transferred to other developments. A strict eligibility criteria applies. The beneficial land owner may be subject to a HFS award should they meet the relevant criteria.

Acid Sulphate Soils

The north/west corner of 23 – 33 Bridge is located in a Class 2 Acid sulphate soils area. As more than 1 tonne of earth will be removed from the site it is plausible that the site is affected by acid sulphate soils.

An Acid Sulfate Soils Management Plan (ASSMP) is required for the site. The ASSMP must be prepared in accordance with the NSW Acid Sulfate Soils Management Advisory Committee, Acid Sulfate Soils Assessment Guidelines 1998 that are classified as being in an Acid Sulfate Soils zone Class 2 or Class 5. The ASSMP must be prepared by a person or company who is qualified and competent in relevant geotechnical expertise in relation to the assessment and remediation of Acid Sulfate Soil risks. The ASSMP must be submitted to Council for assessment prior to any determination of the application.

Mechanical Ventilation

The location of the kitchen exhaust air discharge point is to be submitted to Council for review. The discharge point should be from the roof top, discharging air vertically. Any new penetrations required to the roof to accommodate mechanical ventilation should be reviewed by the nominated heritage consultant prior to submission of amended plans.

Food and Drink Venues

The site is situated within a City Living Late Night Trading Area. Accordingly, any indoor or outdoor trading beyond the base hours should be subject to a trial period in accordance with Section 3.15 of the Sydney DCP 2012.

Transport

Further information is required regarding the following key issues:

1. **Access / Servicing:** Clarity as to how the vertical clearance reduction (ie. less than the Australian Standard) will enable appropriate servicing of the site given the scale of development proposed.
2. **Pick-up/drop-off:** Alternative options (or design) for pick-up and drop-off must be explored *beyond* the zone nominated within D/2016/1641.
3. **Bicycle Facilities:** The provision of bicycle parking and end of trip facilities for the site are inadequate and thus are not supported. The facilities are inadequate in both quantity and quality.

It should be noted that any changes to address kerb side parking restrictions to accommodate a pick up and set down area or coach zones cannot be approved. A separate application is needed to the Central Sydney Traffic and Transport Committee and the Local Pedestrian, Cycling and Traffic Calming Committee for approval of any changes to on-street parking arrangements.

Lighting Strategy

Inadequate information has been provided to assess compliance of the lighting proposal. Detailed lighting designs certified by a practicing lighting consultant as well as prototypes of the proposed external lighting and its lighting levels should be submitted to Council and assessed prior to any determination.

It is strongly recommended that the Lighting Strategy is referred to Sydney Observatory for comment and any concerns. This must be addressed in the final design of the lighting scheme to Council's satisfaction.

Waste

Further information is required regarding the waste room size, location, method for transporting waste between collection point and storage area and the distance from the main store room to the kerb.

The City also has concerns regarding the management of garbage and recycling upon sensitive noise receivers. Accordingly, the Waste Management Plan (WMP) should be amended to ensure consistency with the City's Waste Policy – Local Approvals Policy for Managing Waste in Public Places. A copy of the amended WMP should be submitted to Council for review prior to determination.

Public Art

The Public Art Strategy is yet to be endorsed by Council. It is recommended that the proponent commence discussions with The City's Public Art Advisory Panel prior to determination.

Should you wish to speak with a Council officer about the above, please contact Michaela Briggs, Specialist Planner, on 9265 9333 or at mbriggs1@cityofsydney.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'GJahn', with a large loop on the left and a horizontal stroke on the right.

Graham Jahn AM
Director
City Planning | Development | Transport