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Ms Annie Leung
Team Leader
Key Sites Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

By email: annie.leung@planning.nsw.gov.au

Dear Ms Leung,

RE: Heritage Council comments on Martin Place Station Precinct Stage 2 – North Site (SSD 9270) - Notice of Exhibition

Thank you for your invitation seeking input from the Heritage Council of NSW for the above Over Station Development Environmental Impact Statement (EIS) Exhibition (email 8 October 2018).

We note that this application follows an approval granted by the Minister for Planning on 22 March 2018 for Stage 1 Concept Proposal for an Over Station Development, which included two commercial towers above the northern (North Site) and southern (South Site) entrances of Martin Place Metro Station (SSD 8351).

This Stage 2 application seeks consent for the construction and use of a 39-storey (plus rooftop plant) commercial tower above the northern entrance of the new Martin Place Metro Station providing:

- 75,498m² Gross Floor Area (GFA) including 1,017m² for retail use and 74,481m² for office use.
- New connections between the proposed podium and the existing 50 Martin Place building.
- Signage zones for building identification.
- Vehicle loading, bicycle parking and end-of-trip and service facilities for both over station development at the north and south site.
- Works to integrate with the Station design, including use and fit-out of over station development areas within the station building envelope for plant, services, end of trip facilities, retail and office spaces.

There are a number of heritage items within the vicinity of the Stage 2 Martin Place North development area. Only one State Heritage Register (SHR) item is located within the development area, 50 Martin Place (SHR 01427).

Our comments are based on the Standard Secretary's Environmental Assessment Requirements (SEARs) for SSD 9270 (issued 8 May 2018) and on the review of the following documents.

- Environmental Impact Statement, *North Site Stage 2 - Sydney Metro Martin Place integrated station development (SSD 18_9270)*. Prepared by Ethos Urban, 4 October 2018, Doc Ref: CSWSMP-MAC-SMA-PL-REP-000140
- Heritage Impact Statement, *Sydney Metro and Martin Place Integrated Station Development, Development Application — Stage 2, North Tower*. Prepared by TKD Architects, 31 August 2018, Issue C, Doc Ref: CSWSMP-MAC-SMA-HE-REP-000120

The SEARs required the EIS to include a heritage impact statement (HIS) that assesses the potential impact of the proposal. Generally the HIS adequately covers potential impacts from the proposal and how these have been mitigated through design. However, the SEARs required the EIS/HIS to contain a Heritage Interpretation Plan and consultation statement with the Heritage Council. These requirements should be expanded to properly meet the SEARs.

Heritage Interpretation

The SEARs require a Heritage Interpretation Plan, providing opportunities for the proposal to reflect on the heritage character and significance of the site and surrounding area, including Martin Place.

Section 5.8.5 of the EIS indicates that no heritage interpretation is proposed as part of this proposal. It is concluded that the *Sydney Metro City and Southwest Heritage Interpretation Strategy* (2018) for Sydney Metro CSSI 7400 adequately covers interpretation of the site. However, the Sydney Metro Interpretation Strategy is an overarching strategy which sets out potential themes and approaches to enable interpretation planning during the design and development across the Sydney Metro project area.

The SEARs require an Interpretation Plan to reflect heritage setting of the proposal site, including Martin Place. An Interpretation Plan (as opposed to an Interpretation Strategy) should be a comprehensive document that proposes specific methods to understand, interpret and present the place's heritage significance, both in the short and medium term.

As the current proposal is integrated with the Sydney Metro infrastructure project, there is a unique opportunity for Sydney Metro and Macquarie to work on a collaborative Interpretation Plan for the site. The plan should be comprehensive and incorporate both the Martin Place Metro Station and the Over Station Development.

Consultation with the Heritage Council

The SEARs required a consultation statement with the Heritage Council. The statement was to include the below.

- A description of pre-submission consultation undertaken, including a record of the stakeholders consulted, the issues raised during the consultation and how the proposal responds to those issues.
- An agreed schedule of consultation with the Heritage Council should be included in the EIS.

Consultation information is provided in Appendix F of the EIS. Section 2.2.1 of Appendix F references four separate presentation dates to the Heritage Council. However, the meeting summary table (Table 1) only discusses the results of one of these meetings.

In addition, the table does not clearly identify issues raised during the consultation and how the proposal responds to those issues. The Heritage Council Approval Committee minutes from the 2 May 2018 (published online) indicates that the Committee required more details prior to provision of extensive comment.

A schedule of ongoing consultation has not been provided in Appendix F of the EIS. The Section 2.2.1 of Appendix F indicates that Heritage Council has invited Macquarie to consult further, as matters for discussion arise through the detailed design and construction. However, an overarching schedule of design/construction milestones should be provided in the EIS, to afford the Heritage Council an opportunity to flag issues that require consultation and understand relevant timeframes.

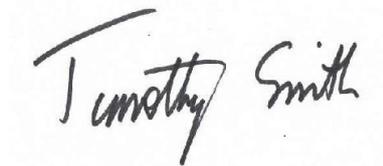
Recommendations

The following advice should be incorporated into the proposal, as part of the Response to Submissions.

- Update the pre-submission consultation statement to include all consultation with the Heritage Council. Details of consultation need to clearly identify issues raised during the consultation and how the proposal responds to those issues.
- Provision of high level design/construction milestones and timeframes, to provide the Heritage Council an opportunity to highlight matters they wish to comment on.
- Develop a Heritage Interpretation Plan in collaboration with Sydney Metro, which reflects on the heritage character and significance of the site and surrounding area, including Martin Place. The site-specific Interpretation Plan should be guided by the Sydney Metro Interpretation Strategy.

If you have any questions regarding our comments please contact Alexander Timms, Senior Heritage Officer at the Heritage Division, Office of Environment and Heritage, on (02) 8837 6067 or at alexander.timms@environment.nsw.gov.au

Yours sincerely

A handwritten signature in black ink that reads "Timothy Smith". The signature is written in a cursive style with a large, sweeping initial 'T'.

TIM SMITH OAM

Director, Operations

Heritage Division

Office of Environment and Heritage

As Delegate of the Heritage Council of NSW

8 November 2018