

14 November 2018

File No: 2018/560945

Our Ref: R/2018/9/A

Annie Leung  
NSW Department of Planning and Environment  
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Sydney NSW 2000  
By email: [annie.leung@planning.nsw.gov.au](mailto:annie.leung@planning.nsw.gov.au)

Dear Annie,

## **Stage 2 – Martin Place North (SSD 9270) and South Sites (SSD 9326) Over Station Developments**

Thank you for your correspondence dated 8 October 2018 which invites the City of Sydney ("the City") to provide comment on State Significant Development (SSD) Applications 9270 and 9326.

The City has reviewed the stage 2 detailed applications for over station tower developments and based on the submitted information **objects** to the proposals in their current forms.

Comments are provided in terms of particular aspects of the proposals and unless otherwise specified, relate to both proposals as follows.

### **Amending Concept Application**

It is noted that the separate amending application (SSD 9347) to modify the approved concept building envelope to the south site (SSD 9351) is as of the date of writing yet to be determined. Prior to the determination of that amending application it is pre-emptive to further the assessment of the current south site application.

### **South Site**

The City remains convinced that an 8 metre tower setback to Martin Place is insufficient and reiterates the City's and Heritage Council's concern that the heritage values of the place will be reduced by the proposed form. The City recommends that the southern tower be set back by at least 25m from Martin Place above the podium height of 50 Martin Place.

Issues previously raised by the City in terms of reduced or not provided setbacks to Castlereagh and Elizabeth Streets include:

- inconsistency with the Martin Place Special Character Area and long term vision for Martin Place;
- inconsistency with the proposed draft Central Sydney Planning Strategy setback requirements and sustainability targets;
- the reduced setback intruding on the Martin Place views including the prominences of the GPO clock tower;
- the lack of building setbacks impacting on pedestrian amenity at both Castlereagh and Elizabeth Streets and negatively affecting the site immediately to the south;
- the proposed FSRs are not 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 in this proposal and the City objects to the proposed building form. The tower form remains insufficiently separated from the podium given the lack of side street setbacks to Castlereagh and Elizabeth Streets.

In spite of the wind study the City remains concerned about the potential for adverse wind environmental effects.

As previously recommended by the City in response to amending concept application SSD 9347, in lieu of requiring these setbacks and ignoring the Planning Assessment Commission's (PACs) recommendations regarding street frontage conditions along Elizabeth and Castlereagh Streets, building returns should be incorporated in the southern street corners of the building 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 PAC's 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.

### **North Site**

The proposed building form of the north tower is incongruous to the character of central Sydney and the Martin Place Special Character area. The City recommends that the northern tower be setback by at least 8m from all street frontages above the podium height of 50 Martin Place. In particular a setback above the podium is essential for Elizabeth Street frontage to address overshadowing of Martin Place which is avoidable.

The City is concerned that the northern tower has been designed to create internal amenity within the tower (in the form of voids and linking stairs) at the expense of the amenity of the public streets which are faced by services, lifts and ducts.

### **Design Excellence**

The City has previously commented on the importance of incorporating competitive design processes as part of proposals in accordance with Sydney Local Environmental Plan 2012 and the 'City of Sydney Competitive Design Policy'.

The City maintains that a competitive design process would achieve a superior outcome in terms of design excellence as compared to the design development of the schemes within the alternative design process as a design review panel.

### **Public Domain Interface**

Both applications note that public domain works within and surrounding the station precinct form part of the Metro CSSI approval (SSI 7400), and an "Interchange Access Plan" and "Station Design and Precinct Plan" (Conditions E92 and E101 respectively) are required as part of that approval. The applications also notes that a holistic approach to the CSSI/Station and OSD integration is an important consideration.

The "Interchange Access Plan" is required to inform the final design of transport and access facilities and services, including footpaths, traffic and road changes and integration with the public domain. The "Station Design and Precinct Plan" is to provide an integrated urban and place making outcome. Both are required to be approved by the Secretary. There is no clear program of when these plans will be finalised.

The finalisation of the public domain details including services and utilities around both of the stations are recognised by all parties as being an important

considerations in terms of the current proposals. These important public domain details should either form part of this application, or be required to be addressed and resolved concurrently with this application to ensure that this important integration is achieved.

The City is concerned that separation of the consideration of the public domain and services to the OSD applications will result in significant compromises to the public domain delivery in Martin Place and the surrounding public domain.

The City is concerned that the structural design and spatial coordination will not allow the realisation of all planned for trees in Martin Place. The City recommends that the station spatial/structural design be reviewed to confirm that all trees indicated on the plans can be provided to the City's standards, particularly within Martin Place.

The Elizabeth Street frontages of both buildings are seriously compromised by services and predominance of steps and ungainly ramps (at the intersections with Martin Place and Hunter Street). The City recommends that the floor levels be reviewed to provide grade entry from Elizabeth Street to station lifts and building lobbies.

Alternative options are to be presented in the flooding assessment to justify the use of flood gates.

### **Shared Facilities**

The applications include the provision of bicycle parking, loading and end of trip facilities for the south site within the basement of the north site (literally an entire street block away).

The provision of the bicycle parking and end of trip facilities in a different building a block away is not supported. The City recommends that the southern basement be redesigned to fully accommodate the required parking and facilities. Bicycle parking and end of trip facilities should be provided in accordance with Sydney DCP 2012.

In regards to the sharing of the loading dock, this arrangement could potentially be supported subject to the provision of a dedicated service corridor directly connecting the north and south basements, and subject to the creation of the appropriate easements to benefit the south site.

Otherwise, it is noted that the small loading dock on the south site does not appear to have sufficient clearance heights.

### **Landscaping**

The proposed landscaping to terraces is a small gesture which should be improved given the scale and important location of the developments. The developments could also incorporate green walls or landscaping within the lobby, mezzanine and retail areas and include a required design deliverable for the fitout of commercial floors.

### **Public Art**

Proposals of this scale should incorporate a public art contribution including the submission of a public art plan. The City's 'Interim Guidelines for Public Art in Private Developments' provides details in terms of what should be provided in a public art plan.

### **Signage**

Top of building signage zones should be limited to a maximum of two zones in accordance with Sydney Development Control Plan 2012. Sufficient details should be included in this application to ensure integration and compatibility with the

architectural design, materials, finishes and colours of the building. The City strongly objects to the approval of the use of more than two top of building signage zones per building.

**Customer Outcomes**

The path of travel from the north and south station entries to metro platforms is unnecessarily circuitous and indirect providing poor customer experience. The circulation has been designed to maximise the value of retail spaces below ground. Wynyard Park is an existing example of this type of poor form of circulation. It is also prevalent in shopping centre design and is specifically used to increase path length and retail frontage value rather than efficiency of travel. The City recommends that the circulation be made more direct with aligned and/or switchback escalator arrangements that minimise path length.

**Contribution**

A condition requiring the payment of an s61 contribution in accordance with the City of Sydney Act for the cost of works should be contained in any approval conditions.

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,

A handwritten signature in black ink, appearing to be 'GJahn', written in a cursive style.

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

City Planning | Development | Transport