

12 October 2010

Mr Sam Haddad
Director-General
Department of Planning
22 – 33 Bridge Street
Sydney NSW 2000

Attention: Andrew Smith

Dear Andrew

**SECTION 75W APPLICATION – MP08_0238
1 DENISON STREET, NORTH SYDNEY**

We write to you in response to your email dated 6 October 2010 which requests further information regarding the proposed plant for the approved commercial development at 1 Denison Street, North Sydney (formerly known as 77 – 81 Berry Street). Specifically, you would like to know why, notwithstanding a proposed reduction in levels and reduction in GFA, the same size plant is required.

Attached to this letter is advice from Norman Disney Young (NDY) (**Attachment A**) which further explains the space required for the plant equipment at 1 Denison Street. NDY note that the actual net lettable floorspace lost in the development is approximately 2,000m². This represents a loss of approximately 4.2% of the total area that is serviced by the plant equipment. This is a small reduction and due to the fact that all plant and equipment come in discrete sizes, NDY advise that the reduction is not sufficient to enable the next smaller size of plant to be selected.

NDY also advise that notwithstanding if smaller plant could be selected, the clearance around the machinery would most likely remain constant and it is the clearance space which constitutes a significant proportion of the plant space required.

Relocating the plant to lower levels of the building is also not an option. The commercial building is already accommodating plant, not only for the commercial building but also the hotel and Beau Monde within the ground plane / podium of the new commercial building. Rice Daubney has undertaken significant effort to design a building which has activity at every frontage due to the site being an island site. An example of this is the location of the substations above ground, something which required special permission from Energy Australia. A requirement to relocate rooftop plant within the lower levels of the building would have a direct impact on the façade of the building at the public interface and most certainly a loss of activity at ground level.

There are also logical reasons why plant equipment tends to be located at the top of the building rather than underground. It would be most inefficient to have flues and the like travelling the length of the building from the basement or podium level.

We also reiterate that the proposed modification is actually seeking to increase the amount of plant area in the basement of the building so as to accommodate sustainable plant features such as a tri-generation in the future. Cundall support the proposed design of the plant areas within the building and note the building allows sufficient space and flexibility for the ever increasing demands to upgrade plant equipment within buildings as technology improves (see letter at **Attachment B**), in particular the increasing trend towards decentralisation of services.

We believe that Condition B1(4) was originally imposed so as to preserve views from the upper levels of Beau Monde. However, since approval was granted for the subject site, approval has been granted by the Department for a taller commercial building at 100 Mount Street (MP08_0241). As such any reduction in plant area on the eastern side of the building would only permit views of the building beyond and not of the harbour as was originally envisaged (see the section prepared by Rice Daubney provided at **Attachment C**). The section shows that the finished floor level of the topmost habitable floor of Beau Monde is located at RL168.765 is lower than the height of the commercial building (RL 170) and thus views beyond the building, even no plant was present would be severely compromised.

Rice Daubney has also prepared view analysis documents (**Attachment D**) which demonstrate that a reduction of plant area on the western side of the building would also have limited effect on the views from the upper levels of Beau Monde. A reduction of plant area would only reveal views towards the Optus Tower and not the harbour or CBD views.

Reducing the plant to the north or south would not have any benefit in terms of the views obtained from Beau Monde. Further, due to the location of the lift core on the eastern side of the building, a reduction in the width on the eastern side of the roof is not possible.

NDY have chosen the plant for the building following a range of considerations including:

- Environmentally Sustainable Design (now and in the future);
- Stability of operation;
- Indoor Environment Quality;
- Ease of construction and maintenance;
- Occupational Health and Safety;
- Life expectancy;
- Tenant's requirements; and
- Capital Cost.

As outlined in this letter the optimum sustainable solution is not possible without adequate plant space provisions and a reduction in the plant area will not result in any significant benefit in relation to the views obtained from the upper levels of Beau Monde. On this basis we request that Department delete condition B1(4) and retain the plant area as was originally proposed.

Should you have any queries about this matter, please do not hesitate to contact me on jbuchanan@jbaplanning.com.au or on 9956 6962.

Yours faithfully



Jennie Buchanan
Principle Planner