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28 June 2011

Sam Haddad  
Director General  
Department of Planning and Infrastructure  
23-33 Bridge Street  
SYDNEY NSW 2000

Attention: Michael Woodland

Dear Michael

**REQUEST FOR DIRECTOR GENERAL'S REQUIREMENTS  
BLOCKS 3B AND 3C, CENTRAL PARK**

We write to you on behalf of Frasers Broadway Pty Ltd requesting that the Director General issue his requirements for the preparation of an Environmental Assessment Report (EAR) to accompany a Project Application (PA) for the proposed development of Block 3B and 3C of Central Park (formerly known as Frasers Broadway).

To support the request for the Director General's requirements relating to the environmental assessment, this letter also forms a Preliminary Environmental Assessment Report (PEAR) relating to the project. The PEAR provides detail on the site location and an outline of the project, its background, and identifies the key likely environmental and planning issues associated with the proposal.

**1.0 SITE DESCRIPTION**

Central Park is located on the southern edge of the Sydney Central Business District (CBD). As shown in **Figure 1**, the site is in close proximity to Central Station, Broadway Shopping Centre and the University of Technology, Sydney.

Block 3B and 3C are located to the east of the Central Park Site and are bounded by Kensington Street to the east, the proposed Kent Road to the West and Block 3A to the north. Block 3B and 3C are located on the northern side of the intersection between Outram Street, Kent Road, Kensington Street, and O'Connor Street. The location of Blocks 3B and 3C on the site are shown in **Figure 2** below.

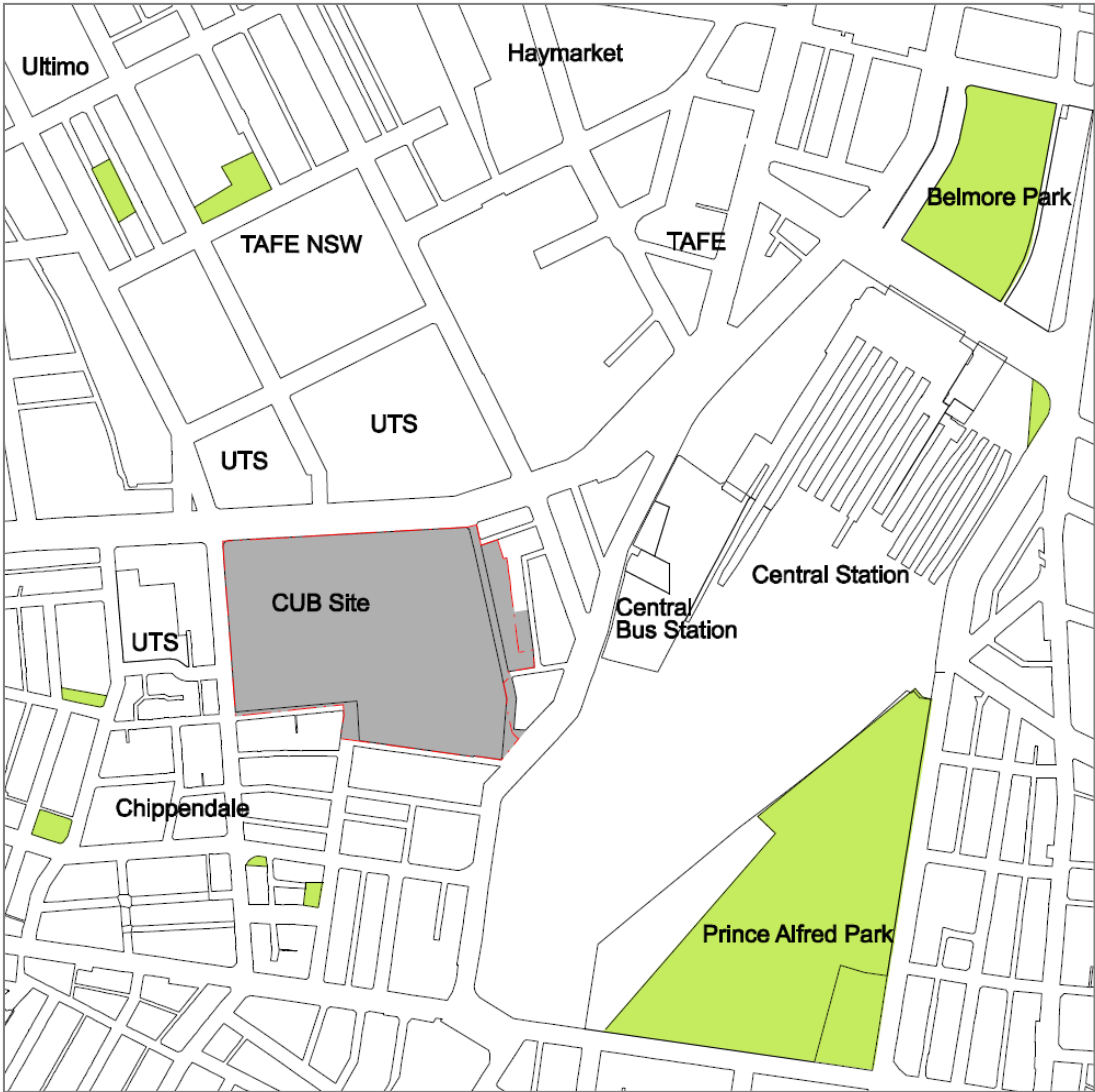


Figure 1 – Location Plan

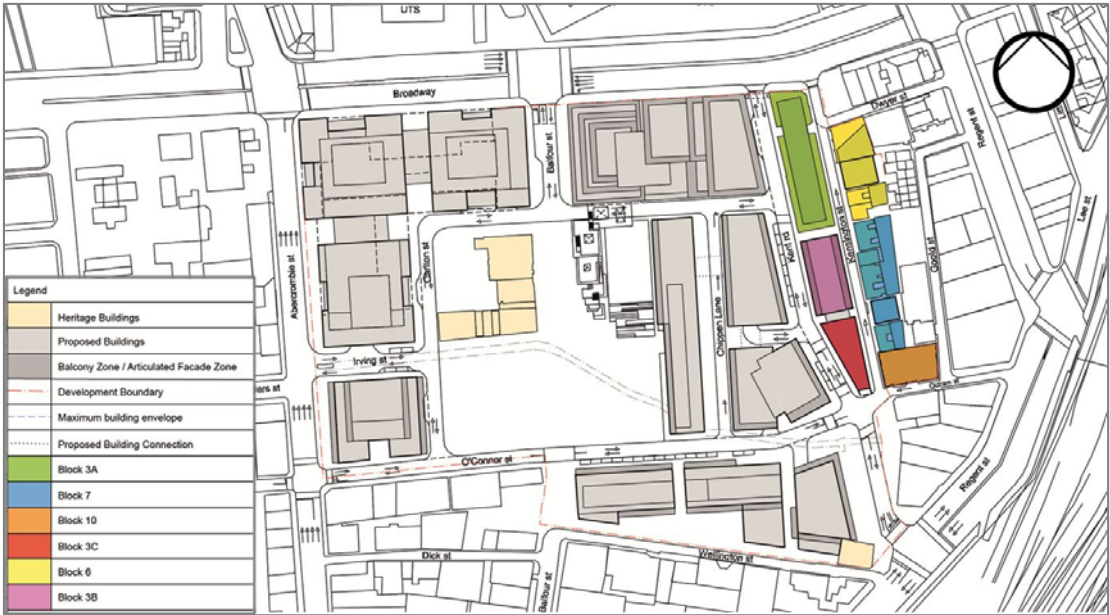


Figure 2 – Location of Blocks 3B and 3C within the Central Park Site.

## 2.0 THE PROJECT

The PA will seek approval for the redevelopment of Blocks 3B and 3C as student accommodation with associated non-residential uses and retail on the ground floor. The scheme will be designed by the architects and will incorporate an elevated link between the Blocks 3B and 3C as shown in the 3D modelling in **Figure 4** below. Block 3B will be built to a maximum height of 45.6 AHD with Block 3C being built to a maximum height of 39.5 AHD.

Block 3 has a total GFA of 10,500m<sup>2</sup> of which 5,400m<sup>2</sup> is to be used for non-residential purposes and 5,100m<sup>2</sup> is to be used for residential purposes in accordance with the Concept Plan (MP06\_0171\_MOD 2). A total of 5,900m<sup>2</sup> gross floor area (GFA) is proposed for Block 3B and 3C collectively.

The ground floor of the proposed development will be used for retail uses that activate the street frontages of Kensington Street and Kent Street. The use of the upper levels as student housing, classified as residential accommodation, is consistent with the Concept Plan. Indicative plans are attached to this document at **Appendix A**.

## 3.0 DRAFT ENVIRONMENTAL PLANNING AND ASSESSMENT AMENDMENT (PART 3A REPEAL) BILL 2011

Central Park is to be classified as State Significant Development (SSD) under the draft *Environmental Planning and Assessment Amendment (Part 3A Repeal) Bill 2011* where the capital investment value of development is more than \$10 million. As the proposed development of Blocks 3B and 3C will have an estimated capital investment value (CIV) of \$27 million, the proposal is classified as SSD.

## 4.0 PRELIMINARY ENVIRONMENTAL ASSESSMENT

The scope of environmental planning issues proposed to be addressed in an EAR to accompany the Project Application is provided below to assist the Department and Director-General in identifying the Environmental Assessment Requirements for the project.

The key environmental planning considerations associated with the proposed development are as follows:

- Compliance with relevant Environmental Planning Instruments
- Compliance with the Central Park Concept Plan and other Project Applications
- Urban Design and Built Form
- Overshadowing
- Public Domain
- Heritage and Archaeology
- Traffic, Access and Parking
- Waste Management
- Noise
- Accessibility
- Energy Efficiency
- Plans of Management
- Services Plan and Details
- Building Code of Australia (BCA) Report

- Construction Management
- Community Consultation

These are discussed in more detail in the following sections.

#### **4.1 Compliance with relevant Environmental Planning Instruments**

The following Environmental Planning Instruments and policies will be relevant to the assessment of the proposed development:

- NSW State Plan
- Draft Sydney City Subregional Strategy
- State Environmental Planning Policy (Major development) 2005 (unless repealed beforehand)
- State Environmental Planning Policy No. 64 – Advertising and Signage
- Sydney Access Development Control Plan 2004
- The City of Sydney Policy for the Management of Laneways in Central Sydney
- City of Sydney Boarding Houses Development Control Plan.

The EAR will provide an assessment of the proposed development against the above instruments and policies and will provide justification for any variations proposed (if applicable).

It is noted that remediation of the site has been dealt with under a previous application (MP 07\_0163) and as such SEPP 55 – Remediation of Land will not be a matter for consideration in this assessment.

#### **4.2 Compliance with the Central Park Concept Plan and other Relevant project Applications**

The EAR will provide an assessment of the proposed development against the Central Park Concept Plan as amended (MP 06\_0171 MOD 2) conditions of consent and Statement of Commitments. In particular the conditions relating to maximum GFA, building envelope, permissible land use and ground floor uses will be considered. The EAR will also reconcile against other relevant planning approvals that apply to the Site including MP 09\_0042 - combined basement approval.

#### **4.3 Urban Design and Built Form**

The EAR will include an assessment of the proposed building design and will outline how the proposed building achieves design excellence. An architectural design statement prepared by the architects will also be submitted explaining the design principles of the building and design responses to the heritage significance of the surrounding draft heritage items.

#### **4.4 Overshadowing**

The EAR will include shadow diagrams which show the shadowing impacts of the proposed building. The EAR will also provide an analysis of the shadows of the proposed development and that of the approved concept plan envelope.

#### **4.5 Public Domain and Landscaping**

A Public Domain Plan will be submitted with the PA providing details of publicly accessible areas and finishes. The plan will be consistent with the overarching Public Domain Strategy approved as part of the Concept Plan.

#### **4.6 Heritage and Archaeology**

The Clare Hotel and the Administration Building which are located north of the site at Block 3A are both identified as draft items of heritage significance. The EAR will include a Heritage Impact Assessment which will confirm that the proposed building works to Blocks 3B and 3C are consistent with the management recommendations made as part of the Concept Plan and will not impact on the heritage significance of these draft items.

Archaeology will also be considered as part of the Heritage Impact Assessment. The Archaeological Assessment will be completed and managed under the relevant legislation and the Archaeological Assessment and Research Design Report prepared by Godden Mackay Logan as per the Concept Plan.

#### **4.7 Traffic, Access and Parking**

A Traffic and Parking Statement will accompany the application which will confirm compliance with the MP 09\_0042 and that sufficient parking and servicing facilities are available for the proposed development.

#### **4.8 Waste Management**

A Waste Management Plan (WMP) will be prepared as part of the EAR. The plan will indicate the collection points and method of removal for Block 3B and 3C as well as the different uses. The report will include details of the waste storage and collection arrangements for the retail uses and student accommodation.

#### **4.9 Noise**

A Noise Management Plan will be prepared as part of the EAR. Consideration of the noise impacts from the proposed hotel to the north on Block 3A and traffic noise from the intersection to the south of the Site will be taken into account. The potential noise impacts created by the proposed development will also be considered in the EAR in particular the management of outdoor communal areas.

#### **4.10 Accessibility**

The proposed development will be designed to provide universal access to all publicly accessible areas and will provide accessible accommodation in accordance with the City of Sydney Access DCP. An access statement prepared by a qualified accessibility consultant will accompany the EAR.

#### **4.11 Energy Efficiency**

An ESD report will accompany the application which will confirm that the proposal is consistent with the overarching ESD strategy for the Site and that the buildings will achieve a minimum 5 star Green Star rating.

#### **4.12 Plans of Management**

An Operational Plan of Management (POM) will be completed for the operation of the student accommodation. This POM will form part of the EAR and will provide details in relation to maximum occupancy onsite management, use of communal areas, facilities and the like.

#### **4.13 Services Plan and Details**

Information on the proposed site services will be provided which will confirm that the existing site services can be suitably augmented to accommodate the proposed development.

#### 4.14 BCA Report

The EAR will include a BCA Report for the existing buildings on the site with regards to the alterations and additions proposed, confirming that they can or do comply with the relevant provisions of the BCA.

#### 4.15 Construction Management

A preliminary Construction and Environmental Management Plan will be submitted with the application outlining the key management measures to be implemented during construction of the proposed development.

#### 4.16 Community Consultation

The EAR will document consultation undertaken during the preparation of the application.

### 5.0 CONCLUSION

The purpose of this letter is to seek the Director General's Requirements for the preparation of an Environmental Assessment Report for the proposed student accommodation and ground floor retail uses on Blocks 3B and 3C, Central Park. It includes a description of the proposed development and an outline of what are considered to be the key issues for the assessment of the Project Application.

We trust that this Preliminary Environmental Assessment is sufficient for Director General to issue his requirements for the preparation of the necessary Environmental Assessment. Should you have any queries about this matter, please do not hesitate to contact me on 99566962 or [jbuchanan@jbaplanning.com.au](mailto:jbuchanan@jbaplanning.com.au).

Yours faithfully



Jennie Buchanan  
*Principal Planner*