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Your Ref: MP 06_0171 MOD 16 & SSD-9374

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Attention: James Groundwater
By email: james.groundwater@planning.nsw.gov.au

Dear James

Request for advice – Modification of Central Park Concept Plan (MP 06_0171 MOD 16) and Block 4B Central Park Adaptive Reuse (SSD-9374)

Thank you for your correspondence dated 27 September 2019 which invites the City of Sydney Council (the City) to provide comments on the proposed modification to the Central Park Concept Plan and the State Significant Development (SSD) for the adaptive reuse of the Brewery Yard buildings known as Block 4B within the Central Park redevelopment precinct.

The City has reviewed the proposed SSD application and modification of the Concept Plan and raise and **objects** to the proposal. The City raises the following issues for your consideration:

1 Heritage impacts

Whilst The City supports the adaptive reuse of the Brewery Yard buildings for retail and commercial office use, it does not support the increase of commercial GFA within the site at the expense of the demolition of significant heritage fabric. The City stresses that any additional floor space should be awarded as an incentive for conservation and ongoing maintenance works and not to replace removed significant fabric.

The Brewery Building Special Element Conservation Plan approved in the Major Project concept plan for the site identifies the structures of the filtration building, malt silo building and chimney stack as well as internal elements including the malt silos and three coal hoppers as exceptional or high fabric within the building. The removal, relocation or interpretation of such internal fabric is not consistent with many conservation policies within the approved conservation plan or with best practice heritage conservation principles as per the Burra Charter and is not supported.

The City recommends the proponent reconsider the removal of significant fabric, the reduction of the removal of such fabric and more significant interpretation techniques to be implemented in any future base building works.

Specific objections the City raises to the proposal in response to heritage impact are outlined in more detailed below:

1.1 Rooftop Addition

The proposed roof addition provides for an additional 2 floors. The addition is distinct from the original masonry form of the building, it comprises glazing and metal materiality to distinguish. Its construction requires the removal of the existing gabled truss roof and one of the two towers. The additional floors will be apparent in views from the north towards the northern elevation of Building 22/23. Its form is supported but the impact on heritage fabric is high. The form does not draw an objection from the City but notes the impact on the heritage significance of the site is high.

1.2 New external stair tower

The submitted heritage impact statement does not take into consideration this stair new tower. The statement should be revised taking into account the updated proposal.

Penetrations to the existing building seem to coincide with the existing windows. The bulk and visual impact could be reduced, however, if the proposed structure will host the staircase only and reduces the length of the “corridor space” between the staircase and the building. The City notes the visual impact is high but acceptable.

1.3 Removal of one coal hopper in building 30

This hopper is documented to be of exceptional heritage significance and one of the few surviving elements of the brewery. Its position is important allowing its appreciation from street views, through the proposed glazed façade. Its demolition is not supported and careful considerations should be made to avoid building visual interruption between the hopper and street views. The City notes the impact on the heritage significance of the site is high and detrimental.

1.4 Reorganisation of floor levels internally for additional mezzanine floors

The proposed additional floors and mezzanine to building 30 does not have a setback from the glazed large façade. These additional 3 floors stop the visibility of the heritage hoppers from street levels. The large glass façade is an important part of the project that allows the appreciation of the exceptional heritage hoppers from street views.

Further, this area within building 30 is the only remaining space within the whole Central Park redevelopment site that could be retained as an open large space for spatial appreciation of the industrial scale of the historic use. This space, enriched by the 3 hoppers, could become the most significant aspect of the project. No additional floors or any opaque surface that interrupt or diminish this visibility of the hoppers are supported. The City notes the impact of these works on significant heritage fabric is high and is detrimental to the significance of the site.

1.5 Removal of silos in building 23

Building 23 is the only building to have an original internal structure and was the only building to retain its original function as part of the malt silos/ plant. It is of exceptional significance. Previous proposals to the building included the demolition of 6 of the 8 concrete silos, with the 2 easternmost silos being retained, along with the retention of

the pyramidal funnel forms at the base of all 8 silos on the ground floor and the plant equipment on the two easternmost silos. This was supported by City is that the complete structure was retained and the function of the structures were interpreted.

The current proposal seeks to further reduce the extent of the silos, retaining the two concrete silos on the first floor only and removing the silos on the upper floors. The impact on the heritage significance is high and detrimental and is not supported. It is recommended that the original extent of the retention of the silos is maintained.

1.6 Modifications to external windows and doors

The City requests that the replacement of steel framing should be conditioned to be "like for like" in the same material. The proposed aluminium framing is not supported and should be avoided.

2 Impacts on northern façade

The City is concerned that the proposed works will impact the existing design integrity of the northern façade and the northern part of the eastern façade.

The original approved design of the completed cooling towers included a deep, angular 'bird's mouth' recess between the underside of the cooling towers and the top of the glass facade. This was intended to make an emphatic articulation between the old building and the new cooling tower on top and was a key heritage and design justification for the approval of the large and contemporary form of the cooling tower. The pitch angle of the lower surface of the recess was to match that of the original roof that was demolished to make way for the towers and also matches the angle of the surviving east brick and stone parapet. The existing steelwork on site is in place for this but the cladding and glass facade were not constructed.

This strong and desirable approved articulation has been diluted in the current proposal, most likely to provide additional clearance for the proposed, intrusive additional floors in this area. This is an unacceptable change to the original design intent and is not supported. The design should be amended to retain and complete the 'bird's mouth' articulation as originally approved.

I also note that the existing steel work spans the full width of the void under the existing cooling towers. The additional columns proposed to support the new, intrusive floors also dilute the clarity of the originally approved design for this area. The design quality of the first stage of this multi-award winning adaptive design project is less in the current proposal and its heritage impacts are far worse with substantial loss of significant internal and external fabric.

3 Ecologically Sustainable Development

The City expects the office component to be designed to achieve at least NABERS Energy 5.5 Stars and for the proponent to demonstrate this by entering into a formal commitment agreement with the NSW Government.

The City also seeks confirmation that this component of the precinct redevelopment will connect to both the trigeneration energy system and the precinct scale water recycling system. The City also recommends that innovation in energy efficiency for services / fit out of any retail components be implemented.

Clarification is also requested as to whether the development will take up any on-site renewable energy opportunities – namely photovoltaic systems / solar thermal and/or heat-pump technology all of which would align with the precinct's espoused focus on ESD / environmental best practice.

4 Transport and Access

4.1 Parking bay and loading and servicing

The proposal includes the provision of a loading bay placed over the public footway and is not supported.

The current property boundary alignment does not allow for an indented bay in this location. It would prevent provision of a continuous footway along publicly owned land, irrespective of whether a path of travel can be provided on private land. Utilising public land in this way, when parking is available on the other side of the road does not represent good use of public assets.

Being private land, the City cannot control accessibility or complete blockage of the pedestrian path. At minimum the land would need to be subdivided and dedicated to the City. However, this is not favoured as a pathway on public land already exists.

Further, the Sydney DCP 2012 suggests 5 loading and service vehicle spaces are required for a development of this size. Given that the proposed loading bay is not supported in its current form, additional information is required to ascertain how the loading and servicing for the proposed development will be achieved.

4.2 Bicycle parking and end of trip facilities

The submitted traffic report has proposed 65 bicycle spaces. This would be acceptable however, no bicycle parking plans have been submitted for review. Council's transport planners recommends that the minimum number of bicycle parking spaces and end of trip facilities to be provided for the development comply with the following table:

User	Number of bicycles to be accommodated	Requirements
Retail /office Staff and employees	40	Class B bicycle parking facility in accordance with AS2890.3
Visitor /Customer	25	Class C bicycle parking facility in accordance with AS2890.3 at grade location close to the main entry for easy identification and convenience.
End of Trip Facility Type	Number	
Showers with change area	4	
Personal lockers	65	

4.3 Green Travel Plan and Transport Access Guide

The Green Travel plan submitted does not meet council's requirements in its current form. It must be updated to include clear and time bound targets, actions, measurements and monitoring framework. As a live document it should be periodically updated. The revised GTP must be developed in consultation with the relevant stakeholders including the Council.

A Transport Access Guide (TAG) has not been submitted as part of this application. It is recommended that a TAG be implemented and maintained by the operator/s of the premises to inform patrons about accessing the site by sustainable transport options including walking and cycling, public transport, taxis or a combination of these modes.

5 Access within the site

The combination of the new foyer and the location of the through site link results in a pedestrian connection that lacks a clear view into or from the central square. A direct visual connection from one space to another is critical in the success and safety of this pedestrian route. It is recommended one of the following amendments be made to the layout to resolve this issue:

- Remove the new foyer addition to 'un-block' the view.
- Reconfigure the foyer to remove the southern protrusion, and enable a direct but oblique view of the through site link from the square.
- Reposition the through site link to the adjacent carriageway bay (to the west), enabling both the retention of the foyer and a clear view through the pedestrian connection.



Figure 1 Options to consider for through-site link

In addition, it is recommended that a detailed plan be submitted showing how an AS 1428.1 compliant landing will marry with existing footpath levels to the southern end of the through site link where the landing will protrude beyond the building line.

6 Public Art

The application has not been accompanied by a public art strategy or public art details and it is difficult to provide comments regarding the installation of public artworks within the development.

A note on the landscape drawing states: *'public art to be installed in courtyard. Artwork by others. Final location to be determined in consultation with City of Sydney, client and artist.'* Given there is no indication at all of the size, extent, or scope of this public art piece, this could have a significant impact on the success of the space. It is strongly recommended that details of the artwork be provided, confirming that it has been designed in consultation with the landscape architects and has no adverse impact on the potential function of the square.

7 Tree planters

The two large tree planter boxes are located above a basement however, the level of the SSL and subsequent depth/volume of the planters is unclear. It is requested that detailed sections through both planters clarifying soil depth, detailed build up and drainage to confirm the planters will provide sufficient soil volume for the intended planting be provided for review.

8 Waste Management

An insufficiently detailed waste management plan has been provided as part of the application documents. The waste management plan must clearly address the following:

- a) Waste generation calculations to support proposed number and configuration of bins, detailed by proposed type of use and total space allocated using the Guidelines for Waste Management in New Developments 2018.
- b) Plans and drawings of the proposed development that show location and space allocated to the waste and recycling storage area(s).
- c) Nomination of the waste collection point(s) for the site and identification of the path of access to be used by collection vehicles. As per the provisions of the Sydney DCP 2012 waste collection should preferably be accommodated wholly within the new development and within the buildings' basement. Alternatives must be discussed if this option is not possible.
- d) Details of the ongoing management of the storage and collection of waste, including responsibility for cleaning, transfer of bins between storage areas and collection points, maintenance of signage and security of storage areas.
- e) A demolition and construction waste and recycling management plan is required to be submitted, the template can be found in Appendix section of the Guidelines.

9 Public domain and building lighting

A public lighting strategy should be considered either during the assessment or as a condition of consent.

Should you wish to speak with a Council officer about the above, please contact Marie Burge, Planner, on 9265 9333 or at mburge@cityofsydney.nsw.gov.au.

Yours sincerely,



Graham Jahn AM
Director
 City Planning, Development & Transport