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Emily Dickson
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By email: emily.dickson@planning.nsw.gov.au

Dear Emily

SSD 9571 – UTS Blackfriars Precinct Research Building Stage 2

Thank you for your correspondence dated 7 November 2019 requesting for the City of Sydney Council (“the City”) to comment on the State Significant Development (SSD) Stage 2 detailed proposal for the UTS Blackfriars Precinct Research Building.

It is acknowledged that the proposed design has undergone a rigorous design excellence competition process. The Design Jury selected the non-conforming scheme from Tonkin Zulaikha Greer Architects (TZG) to be further developed. This additional process enabled the non-conforming scheme to be refined and address the concerns the City raised at the concept proposal stage, notably issues of flooding, access and servicing the substation, solar access, heritage, built form and massing as well as other design issues. The subject application is the product of this extensive consultation and design refinement.

The City has reviewed the supporting information provided with the SSD. The proposal is consistent with the envelope and development standards approved under the Stage 1 Concept Proposal. The developed scheme has also incorporated the recommendations of the Design Jury arising from the design competition process.

Accordingly, ***the proposal is generally supported*** and the following matters are highlighted to the Department of Planning, Industry and Environment (DPIE) for further consideration:

1. Development Contributions

The Environmental Impact Statement (EIS), prepared by Urban AC, provides reasoning for nil or a reduced Section 7.11 Development Contribution to be paid for the development as required under the City of Sydney Development Contributions Plan 2015. The justification provided relies on *Circular D6 – Crown Development Applications and Conditions of Consent* as well as the statement detailed in the EIS on the nexus between the proposed development and the demonstrated need for additional public facilities and infrastructure arising from the development.

The Circular states that “*Crown activities providing a public service lead to significant benefits for the public in terms of essential community services and employment opportunities... and these activities are not likely to require the provision of public services and amenities in the same way as developments undertaken with a*

commercial objective". To supplement this, the EIS details that the nominated new facilities and infrastructure for which the contributions will be typically levied for will not be utilised by workers employed at the proposed development and the increase in workers will not contribute to the need for the nominated infrastructure. Therefore, the physical nexus between the proposed development and the demand for services, notably open space, community facilities, traffic and transport and storm water drainage, does not warrant the full Section 7.11 development contributions to be payable.

Whilst the proposal is a Crown development for a tertiary institution, the development will significantly intensify the site and result in a net population increase of visitors and workers and require infrastructure and services to be provided. University development generates significant demand on City infrastructure, despite the university providing facilities on campus. Accordingly, the City does not support any exemption or reduction to the Section 7.11 Development Contributions.

2. Heritage and Urban Design

The Heritage Impact Statement (HIS), prepared by Paul Davies Pty Ltd, makes reference to a Conservation Management Plan (CMP). However, this was not submitted with the application and should be made available to assist in determining the heritage impact and conservation measures of the proposal. It is recommended that special consideration be made to the modifications to the heritage fence and the relocation of the sandstone pillars and gates. The stone appears to be in a fragile and delaminated condition. Pressured cleaning of the stone should be avoided to prevent loss of patina and prevent disturbance of the water absorption balance of the sandstone with the environment. Chemical stripping of the stone would be less evasive. Therefore, methodologies of sandstone cleaning must be indicated in the CMP.

The proposal's heritage interpretation design is to incorporate the outcomes of the archaeological excavation. It is requested that the additional details of the proposed interpretation items described in the heritage interpretation strategy be provided.

Having regard to the heritage context of the site and surrounding area, it is recommended that the height of the proposed totem signs (Type 2) be reduced from 4m to a maximum of 1.8m. Further, the main business identification signage on the west elevation (Type 1) should not be illuminated.

3. Contamination

Analytical results of previous investigations of the site indicate that the majority of contaminants are located at concentrations across the site. Therefore, consideration must be made to *State Environmental Planning Policy No. 55 – Remediation of Land*, which stipulate demonstration that the land is suitable for the proposed use.

A Remediation Action Plan (RAP), prepared by Douglas Partners, was submitted with the application. However, to ascertain that the subject site is suitable for development, The City requires that the RAP be peer reviewed by a NSW EPA Accredited Site Auditor and include a Section B Site Audit Statement or a letter of Interim advice from the Site Auditor certifying that the RAP is practical and the site will be suitable after remediation for the proposed use. This should be provided prior to the granting of any development consent for the proposal.

4. Public Domain

4.1. Stormwater Quality Assessment

The City has adopted the MUSIC (Model for Urban Stormwater Improvement Conceptualisation) Link to demonstrate compliance with water quality requirement. The stormwater quality design and report for the proposed development must comply with the City's MUSIC Link model. The certificate and report from the MUSIC Link model and the electronic copy of MUSIC Model must also be submitted prior to any approval of the development.

4.2. Public Domain Plan

There is an existing, and recently installed, concrete footpath along the length of the Buckland Street frontage which includes verge planting, kerbside parking and Ausgrid light poles. Additionally, the Blackfriars Street frontage comprises of a patchy asphaltic concrete footpath with large Plane trees and a redundant concrete driveway.

It is recommended that the Stage 2 development include public domain works to the Blackfriars Street frontage to emulate the upgraded public domain of Buckland Street, including asphaltic footpath works and the installation of a footpath at the redundant driveway in accordance with the *City of Sydney Public Domain Manual*. Further, public domain lighting must also be shown to comply with the *City of Sydney Public Domain Design Codes: Sydney Lights*.

5. Landscape and Tree Management

The submitted Landscape Plans and Landscape Report, prepared by JMD Design, have been reviewed. Whilst the landscape concept is supported in principal, the City recommends that the proposed landscape works should consider and encompass the entire Blackfriars precinct and not just the curtilage of the new research building.

The submitted landscape documents do not provide a sufficient level of detail and coordination. The landscape plans do not identify tree numbers for existing trees to be retained or removed as specified in the submitted Arboricultural Impact Assessment (AIA) Report, prepared by Earthscape Horticultural Services. The location of new trees is unclear and the indicative plant schedule nominates a larger number of trees measuring 2000L rather than the required 400L size.

The landscape concept includes new raised timber decking and seating works at the base of a highly significant Camphor Laurel (Tree 1) and within the structural root zone (SRZ) and tree protection zone (TPZ) that may result in significant impacts on the tree. Additional information is required to demonstrate the design and location of footings to mitigate tree impacts. This is to include root mapping investigation, detailed design and construction details.

Further, the landscape concept includes a number of different green walls and climbing trellis and raingardens located on existing and new structures, including heritage fabric. However, no details are provided. No information has also been provided for the works near the heritage items and walls. The condition of the heritage fabric should be identified with an acceptable drainage design to be implemented to ensure there is no water damage to the heritage fabric. Sections of the heritage palisade fence are proposed to be moved including relocation of entry pillars, new palisade fence sections near the booster. The extent and design of these

changes is not documented by the landscape architect. Also, the proposed materials and finishes include a number of options under consideration and should be definitive prior to any approval being granted.

5.1. Tree Removal and Tree Planting

The AIA identifies 82 existing trees within the Blackfriars precinct and adjoining public domain. Of these, 15 trees are proposed to be removed to accommodate the new building and 6 new trees will be planted. Specifically, one tree is proposed for removal between Trees 33 and 34, but this is not identified in the AIA.

It is acknowledged that the removal of Trees 33, 35, 45 and 50 is to necessitate the building footprint of the development that would encroach on the SRZ of these trees. However, the AIA does not adequately demonstrate the degree of encroachment on the SRZ to warrant the removal of these trees to facilitate the development. Therefore, it is recommended that methods of canopy modification pruning be explored to retain the trees.

The proposed planting of 2 advanced tree specimens to compensate for the removal of Trees 33, 34 and 35 with 2 advanced specimens is unsatisfactory. It is recommended that Tree 34 be replaced with a super advanced specimen of a medium-sized tree species. Also, if it is demonstrated that Tree 33 and 35 must be removed, they must be replaced with a super advanced specimen of a medium-sized tree species.

6. Transport and Access

The Parking and Traffic Assessment Report, prepared by PTC, indicates that the existing vehicle access on Buckland Street allows for SRV size vehicles to service the site in a 3.5m x 10m loading area. The provided swept paths confirm that SRV vehicles achieve a forward in and forward out motion to and from the site. The Report also indicates that large vehicles will require reverse manoeuvring within the site from Buckland Street that will be controlled by a traffic controller to ensure safety during sporadic and infrequent heavy vehicle movement. In consideration of these matters, suitable conditions of consent should be imposed to any approval for a Loading and Service Management Plan to be submitted to include the servicing requirements for the site. Further, the applicant should be requested to provide a Construction, Traffic and Parking Management Plan (CTPMP) to the City for assessment and confirmation.

Condition No. B13 of the Concept Approval requires the development to provide adequate bicycle parking and end of trip facilities within the building in accordance with Sydney Development Control Plan 2012. Accordingly for the case of the development, 60 Class B bicycle spaces that are secure and weather protected must be provided in accordance with Australian Standards 2890.3:2015 with 60 lockers and associated end of trip facilities containing 6 showers and change rooms. To support the provision of bicycle parking and zero car parking on the site, a Green Travel Plan (GTP) should be prepared to manage and achieve sustainable transport usage for the users of the building.

7. Sustainability

The City considers there is an opportunity to expand on the proposed rain water harvesting for use not only to the façade and evaporative air cooling of the building

but also for non-potable water usage and grey water harvesting for internal facilities. The Design Report, prepared by TZG, provides details of the hydraulic design of the southern glazed façade and water collection. It is encouraged that the technical details of this system be provided to demonstrate certainty that the recycled water for the cooling effect of the building can be achieved.

Further, the Design Report makes reference to the photovoltaics on the roof of the development for energy security and battery storage to achieve carbon neutral energy performance. The City recommends that evidence must be provided to support this claim to the building's sustainability and resilience.

8. Waste

The submitted Waste Management Plan, prepared by SMEC, must be amended to consider the waste generation calculations in accordance with the Guidelines for Managing Waste in New Developments 2018 as well as nomination of the waste collection points for the site. The architectural plans must also be amended to include locations and spaces allocated to the waste and recycling storage areas including bulky waste. Specifically, a minimum of 4sqm space is required for bulky waste. A dedicated space is required for the storage and recycling of food waste for collection as well as separate space for the collection of beverage containers that can be redeemed under the NSW Container Deposit Scheme. Commercial waste service collection and storage arrangements must be carried out in accordance with the City's *Waste Policy – Local Approvals Policy for Managing Waste in Public Places (2017)* by commercial waste contractors prior to the commencement of the use.

9. Public Art

The Public Art Report for the 'Rain Falls' water art work, prepared by Studio TCS, provides two options for the sequencing water flow of the art work. The City recommends that 'Option 1 – Multiple sequences with solenoids' be pursued given the reasonable cost and the scale of the development.

Should an approval be granted for the development, it is requested that The City be given the opportunity to provide input on any conditions that should be imposed to any consent.

If you wish to speak with a Council officer about the above, please contact Reinah Urqueza, Specialist Planner, on 9265 9333 or at rurqueza@cityofsydney.nsw.gov.au.

Yours sincerely,



Graham Jahn AM
Director
 City Planning | Development | Transport