To the West

West of Gresham Street is a collection of commercial buildings including the Christie Conference Centre (**Figure 36**) and 56 Pitt Street office tower. A number of cafes and restaurants front Gresham Street and Spring Street opposite the Lands Building. In addition, the Australian Stock Exchange is located on the north-west corner of Bridge and Pitt Street (**Figure 37**).

Figure 36 – Christie Conference Centre building
Source: JBA

Figure 37 – Australian Stock Exchange building
Source: JBA

3.0 Description of the Development

3.1 Overview of Proposal

This application seeks approval for the following:

- demolition of existing improvements and alterations to the Lands and Education Buildings to facilitate their adaptive reuse for the purposes of 'hotel or motel accommodation', with ancillary licensed food and drink premises and retail premises;
- excavation and construction of three basement levels below the Education Building and a subterranean link beneath Loftus Street between the two buildings;
- construction of four additional levels above the Education Building up to a height of RL 60.03;
- removal of existing pitched roof elements and construction of a replacement roof structure on the Lands Building up to a height of RL 35.50;
- provision of an external building illumination system; and
- associated utilities and infrastructure.

The following detailed description of the proposal is based on the Architectural Drawings prepared by MAKE and Ridley (**Appendix A**) and the Architectural Design Statement prepared by MAKE (**Appendix B**). The Architectural Design Statement provides a comprehensive description of the proposed works to the building, the layout, design intent and adaptation of the Buildings.

Photomontages of the proposed development are included at **Figures 38** and **39** with further photomontages located in the Architectural Design Statement.

Figure 38 – Proposed view of both buildings from Bent Street
Source: MAKE

Figure 39 – Proposed view of the Education Building from Bent Street
Source: MAKE

3.2 Numerical Overview

3.2.1 Numerical Summary

Table 2 outlines the key numeric information of the proposal.

Table 2 – Key development information

Component	Proposal
Site area	6,182m^2 comprising: - 3,320m^2 – Lands Building site - 2,762m^2 – Education Building site - 100m^2 – Loftus Street
GFA	Lands Building – 10,918m^2 Education Building – 20,715m^2
FSR	Lands Building – 3.3:1 Education Building – 7.5:1
Maximum Height	RL 60.03
Hotel Rooms	Total - 253 Lands Building – 61 Education Building - 192
Bicycle spaces	60 bicycle spaces

3.3 Development Objectives

The proposed design for the adaptive re-use and conversion of the Lands and Education Buildings has undergone detailed, robust and iterative design development from the project inception. The key themes which have remained constant from the outset and guided the development of the proposed design through the design refinement process are to:

- deliver one of the finest hotels in the world;
- open up the buildings to the public and actively engage with the city; and
- set up a respectful and active dialogue between the two buildings and their heritage.

3.4 Design Objectives

In order to translate the development objectives into a design scheme, MAKE developed a series of overarching objectives for the Sandstone Precinct and then developed further design principles for each building, which are detailed in the Architectural Design Statement. The design objectives and principles for the proposed development are summarised below.

3.4.1 Sandstone Precinct Objectives

The key objective is to set up a positive, engaged dialogue with context, with history, between the two buildings and with the public. In order to achieve this outcome, MAKE has sought to:

- re-engage the Buildings with the life and experience of the city;
- provide a balance of interpretation while retaining people's ability to discover and explore the Buildings for themselves;
- present a new fifth façade or roofscape;
- establish a positive dialogue between the buildings and the city;
- provide public access in a privately run building to redress the inherent conflict of the public administration buildings being closed to the public they serve; and
- ensure that access is equitable to all.

3.4.2 Lands Building

The design approach for the Lands Building has been to seek to secure and safeguard its historic fabric for future generations and open up the building to the public for the first time. The principles established to guide the Lands Building design respond to four key themes:

- Architectural Form.
- Public Engagement.
- Internal Arrangement.
- The Roofscape.

The design principles are summarised as follows:

- secure and enhance the existing street level views;
- facilitate the appreciation of the five roof structures and their relationship to the strong, arcaded sandstone base;
- retain the public uses at ground floor and convert the upper administrative levels to hotel rooms;
- provide interpretation and context for the existing heritage fabric and its history;
- create cultural and exchange spaces for art, information, debate and reflection;
- provide partitions that are drawn directly from the cues of the building fabric;
- review the degraded state of the roofscape and enhance the setting of the towers and domes; and
- utilise the five grand roof structures to provide spaces that will delight with their imagination and unexpected vistas of buildings, the City and the Harbour.

3.4.3 Education Building

The design approach for the Education Building is based upon a detailed understanding of the original design concept and seeks to reconfigure the building in line with the first intent. The Education Building will be a 'Grand Hotel' that will engage with and take part in the life events and traditions of the city. In line with the Lands Building design, the principles established to guide the Education Building design responds to the same four key themes as set out Section 3.4.2. The design principles for the Education Building are summarised as follows:

- reinforce the confident simplicity of the external form;
- draw on the existing language of regular repetitive rhythms, strong horizontals and anchoring corners;
- provide a new extension that is clearly of contemporary provenance, and uses lighter finer materials to contrast with the robust sandstone form of the original building;
- provide a clear visual connection with Farrer Place;
- open the space to the public; and
- establish the principal hotel entrance leading from Farrer Place.

3.5 Site Preparation

3.5.1 Demolition

Demolition plans are provided within the Architectural Drawing set provided at **Appendix A**. As shown, demolition of existing improvements within both the Lands and Education Buildings is required in order to facilitate the proposed works.

A Phase 1 Hazmat Report has been prepared by CETEC (**Appendix BB**) which confirms that the following materials are in existence within both Buildings:

- asbestos fibre cement, insulation, electrical boards and gaskets;
- lead paint, sheet, and dust;
- synthetic mineral fibre cement;
- polychlorinated biphenyl (PCB);
- mercury; and
- ozone depleted substances.

It is proposed that where parts of the Buildings will be demolished or impacted by the proposed works, that all hazardous materials will be removed by suitably licenced contractors in accordance with the relevant legislative requirements, codes and practice guidelines, as recommended in the Hazmat Report.

3.5.2 Excavation

Bulk excavation to a depth of approximately RL-0.23 below both the Lands Building, Education Building and potentially Loftus Street will be undertaken. The exact method of excavation is still to be determined and will be dependent on detailed Geotechnical Investigations, and advice from the appointed excavation contractor, demolition contractor and main building contractor. The extent of the proposed excavation works is shown on the Demolition Drawings included at **Appendix A**.

3.6 Structural Works

The proposed development incorporates structural modifications to both the Lands and Education Buildings. Essentially, the proposed additions above the Education Building will require the steel columns and foundations in the existing building to be strengthened and/or enlarged. Both buildings will be upgraded to meet relevant Australian Standards, where possible and to improve fire rating. Further details of the proposed structural works are set out in the Structural Report prepared by TTW (**Appendix I**).

3.7 Lands Building Design

3.7.1 General Arrangement

The proposed design for the Lands Building is based upon the need to retain, secure and safeguard as much of the existing historic fabric of the building as possible. In this respect it retains the central 'Strong Room' vault, the two central light wells, and the general room and perimeter corridor arrangement. The Architectural Design Statement (**Appendix B**) explains in detail the proposed design for the building, however the following sections summarise the proposed arrangement and works.

A level-by-level description of the proposed arrangement is provided in **Table 3** below.

Table 3 – Land Building Proposed Arrangement

Level	Proposed arrangement
Basement 03	A small back of house area is provided at the lower level which comprises: ▪ a back of house room; ▪ new lift core for two lifts; and ▪ fire stairs The basement back of house area links horizontally with the back of house facilities provided at Basement Level 03 within the Education Building. The two areas are linked by the new subterranean tunnel.
Basement 02	At Basement Level 02, only the lift core and fire stairs will be provided.
Lower Ground	The Lower Ground Level will provide: ▪ entry/exit from Bridge Street; ▪ a perimeter corridor, 3 lifts and stairs; ▪ retail/ restaurant spaces along the Bridge Street frontage which will be serviced by two kitchen areas; ▪ entry/exit from Gresham Street; ▪ retail spaces along the Gresham Street frontage; ▪ a cultural space, public amenities, a kitchen, back of house facilities and plant along the Loftus Street frontage, however due to the sloping nature of the site, this will be below ground, ▪ garbage store and back of house facilities, within the south-eastern corner; and ▪ a new internal public street which will be known as the 'Carriage Route' within the central portion of the building that will link to the two entry/exit points.
Ground Level	The Ground Level will provide: ▪ entry/ exit from Bent Street, modified to include sesame stairs (or equivalent) for equitable access; ▪ reception area/lounge and luggage store adjacent to the Bent Street entrance ▪ a perimeter corridor, 3 lifts and stairs; ▪ 19 guest suites; ▪ back of house facilities; and ▪ a guest lounge within the central 'Strong Room'.
Level 01	Level 01 will provide: ▪ 22 guest suites; ▪ perimeter corridor, 3 lifts, stairs and back of house facilities; and ▪ a guest lounge within the central 'Strong Room'.

Level	Proposed arrangement
Level 02	Level 02 will provide: ▪ 20 guest suites; ▪ perimeter corridor, 3 lifts and back of house facilities; and ▪ a guest lounge within the central 'Strong Room'.
Level 03	Level 03 will provide: ▪ the main hotel reception/ check-in for the Lands Building within the eastern tempietti tower, which connects to a guest arrival room; ▪ a guest lounge/ breakfast area/ bar within the Northern Dome; ▪ a guest lounge/ breakfast area and home kitchen in the north-western corner; ▪ an external terrace area within the north-eastern corner; ▪ gym /spa reception areas within the eastern tempietti tower; ▪ spa treatment rooms; ▪ back of house/ kitchen facilities; ▪ 3 lifts and stairs; and ▪ stairs and a new lift within the Clock Tower.
Level 04 - Roof	The Clock Tower, north and south Domes and East and West tempietti towers will be retained. However, a new roof structure will be provided in place of the existing profiled metal roof, prefabricated metal steel truss, plant, vents, ladders and ad hoc structures. The new roof structure will have a curving form and have a gridshell appearance. The metal grid will be infilled with treated glazing in the north-western corner, curved and ribbed stainless steel panels in the southern portion and an open curved pergola will be provided over the north-eastern external terrace area. The maximum height of the new ancillary roof will be RL 35.50. A photomontage of the proposed roof form is included at Figure 40. On top of the southern portion of the roof structure, an external viewing terrace will also be provided.
Level 05	Level 05 will provide: ▪ a gallery within the Northern Dome; ▪ a gym within the eastern tempietti tower; ▪ a meeting room within the western tempietti tower; and ▪ lift core and stairs within the Clock Tower.
Levels 06-08	Lift core and stairs will be provided within the Clock Tower.

Figure 40 – Photomontage of the proposed roofscape
Source: MAKE

3.7.2 Public Access and Circulation

The proposed design utilises the existing pedestrian access points leading from Bridge Street and Gresham Street into the Lower Ground Level Carriage Route, which is proposed to be provided over the alignment of the original carriage loop. Direct access into the Ground Floor Level will also be provided from Bent Street, which will be modified to include a sesame stair (or equivalent) to ensure equitable access is provided.

The perimeter corridor will also be retained at the Lower Ground, Ground Floor and Levels 1 and 2.

In terms of vertical access:

- the southern, eastern and western stairs will be retained to provide access between Lower Ground Level and Level 3;
- three new lifts will provide access from the Basement Level and Lower Ground Level to Level 03.
- the stairs within the eastern and western tempietti towers will be reconfigured;
- the stairs within the Clock Tower will be retained; and
- a new lift core will be provided within the Clock Tower.

3.7.3 Conservation Works

The proposed works to the heritage fabric of the Lands Building will include:

- conservation of the exterior fabric that makes a defining contribution to the overall heritage significance;
- conservation of the interior fabric that makes a defining contribution to the overall significance;
- interventions to provide publicly accessible facilities at Lower Ground Level;
- interventions to adapt the Ground Level entry from Bent Street;
- interventions that will adapt the Ground Level and Levels 1 and 2 to form the guest accommodation;
- interventions to the Strong Room on all levels to reinstate the original spatial form;
- interventions to the north and south courtyard light wells;
- a new ancillary roof at Level 4;
- conservation of the eastern, southern and western staircases;
- construction of new lift cores;
- interventions to the Northern Dome to create a habitable room;
- interventions into the eastern and western tempietti tower to create habitable spaces;
- interventions to the Clock Tower to include the installation of a lift core and structural works;
- provision of new services;
- new colour schemes;
- new interior and exterior signage;
- heritage interpretation; and
- interventions to address the requirements of new or upgraded fire safety measures, acoustic isolation, utility requirements and modifications to meet the BCA.

3.7.4 Interior Design

The interior design strategy for the Lands Building is driven by its unique history, design and purpose. BAR Studio has prepared an Interior Design Strategy (appended to the Architectural Design Statement at **Appendix B**), that:

- introduces the key themes for the proposed interior design strategy;
- identifies the selected feature spaces within the Lands Building;
- provides the illustrative internal materials and colour palette;
- identifies the interior design principles; and
- illustrative guest suite designs.

3.7.5 Interior Landscaping

As indicatively shown on the Architectural Plans at **Appendix A**, the following areas will include internal landscaping in the following locations:

- the Lower Ground Level Carriage route;
- the gantries, located to the north and south of the central Strong Room guest lounge at Ground Floor Level, Level 1 and Level 2; and
- the external terrace at Level 3.

3.7.6 External Materials and Finishes

The new ancillary roof structure will comprise:

- steel and glass diagrid on the north-west roof;
- open steel pergola above the north-eastern external terrace; and
- curved, ribbed, stainless steel panels on the southern roof.

3.8 Education Building Design

3.8.1 General Arrangement

The proposed design for the Education Building is based upon the intention to provide a 'Grand Hotel'. Many of the original features of the Education Building have been removed or altered overtime, therefore the design approach for the Education Building has been to remove the more contemporary office-related additions and partitions, re-instate the central courtyard and return the layout to an arrangement more in line with the original intent, whilst providing contemporary spaces and uses, retaining and conserving the significant heritage fabric and making it more publicly accessible.

A level-by-level description of the proposed arrangement is provided at **Table 4** below.

Table 4 – Education Building Proposed Arrangement

Level	Proposed arrangement
Basement 03	Basement Level 03 will provide: ▪ housekeeping and laundry facilities, which will service both Buildings; ▪ back of house offices and staff facilities; ▪ two new lift cores which will provide space for four new goods lifts and fire stairs. Basement Level 03 will be linked to the Lands Building via the new subterranean tunnel, which will be constructed beneath Loftus Street.
Basement 02	Basement Level 02 will provide: ▪ plant rooms; ▪ staff facilities; ▪ 4 goods lifts and fire stairs.
Basement 01	Basement Level 01 will provide: ▪ a ballroom and double height pre-function space; ▪ 2 new public lifts; ▪ main hotel kitchen and ballrooms storage area; ▪ amenities; ▪ new grand stair cases; and ▪ 4 goods lifts and fire stairs.
Lower Ground	The Lower Ground Level will provide: ▪ entry/ exit from Bridge Street; ▪ a suite of four functions rooms along the Bridge Street frontage; ▪ pre-function areas and amenities; ▪ a pedestrian entry/ exit from Loftus Street ▪ a shared loading dock entry/ exit and pedestrian entrance from Loftus Street; ▪ a staff/ service pedestrian entry/ exit from Young Street; ▪ cycle store; ▪ loading dock and garbage storage rooms; ▪ back of house facilities; ▪ 4 goods lifts and 2 public lifts; ▪ two grand stair cases leading down to the Ballroom; and ▪ a bar in the south-western corner, fronting the corner of Bent Street , Farrer Place and Loftus Street.
Ground Level	The Ground Level will provide: ▪ the main hotel entrance leading from Farrer Place, modified to include sesame stairs (or equivalent) for equitable access; ▪ a central garden courtyard area (refer to Figure 41); ▪ main hotel reception lobby, lounge and baggage storage area; ▪ 2 bar areas; ▪ restaurant; ▪ kitchen and back of house facilities; ▪ amenities; ▪ 4 main lifts; and 2 goods lifts
Level 01	Level 01 will provide: ▪ 25 guest bedrooms; ▪ 4 public lifts, 2 goods lifts and 2 stair cases.
Level 02	Level 02 will provide: ▪ 31 guest bedrooms; ▪ 4 public lifts and 2 goods lifts; and ▪ a publicly accessible stair and a separate fire stair.
Level 03	Level 03 will provide: ▪ 31 guest bedrooms; ▪ 4 public lifts and 2 goods lifts; and ▪ a publicly accessible stair and a separate fire stair.
Level 04	Level 04 will provide: ▪ 31 guest bedrooms; ▪ 4 lifts; and ▪ a publicly accessible stair and a separate fire stair.

Level	Proposed arrangement
Level 05	Level 05 will provide: ▪ 15 guest bedrooms; ▪ swimming pool; ▪ gym; ▪ changing facilities; ▪ spa treatment rooms; ▪ 4 public lifts and 2 goods lifts; and ▪ a publicly accessible stair and a separate fire stair.
Level 06	As noted in Section 3.8.2, Level 06 is the first level of the new roof extension (refer to Figure 40) and will provide: ▪ 17 guest bedrooms; ▪ a rooftop garden area for guests; ▪ glazed roof over the central courtyard void; ▪ plant and back of house facilities; ▪ 4 public lifts and 2 goods lifts; and ▪ stairs
Level 07	Level 07 will provide: ▪ 17 guest bedrooms; ▪ plant and back of house facilities; ▪ 4 public lifts and 2 goods lifts; and ▪ stairs
Level 08	Level 08 will provide: ▪ 17 guest bedrooms; ▪ plant and back of house facilities; ▪ 4 public lifts and 2 goods lifts; and ▪ stairs
Level 09	Level 09 will provide: ▪ 8 guest bedrooms; ▪ 4 public lifts; stairs; and ▪ plant
Level 10	Level 10 will provide: ▪ two roof terraces linked to bedrooms at Level 09; and ▪ roof.

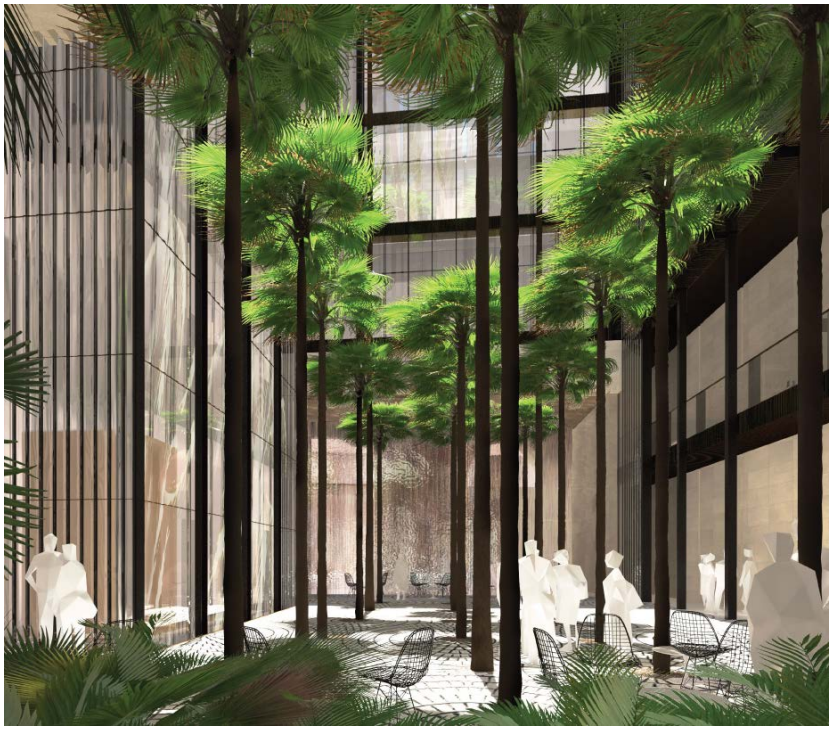

Figure 41 – Garden Courtyard
Source: MAKE

3.8.2 Roof Extension

The proposed design of the Roof Extension is detailed in the Architectural Design Statement at **Appendix B**. In summary, the existing Level 6 southern roof extension will be demolished and then rebuilt to the same alignment to provide a base structure for the new roof extension. The new roof extension will then be provided at Levels 7, 8 and 9.

The fenestration of the Level 6 structure will have a simple repeating rhythm that will act as a mediator between the sandstone form below and the new contemporary roof form above. It has also been designed to provide the optical effect of reducing the visual impact of the roof extension.

As illustrated in the photomontages, Levels 7 and 8 will be set back from the Level 6 base and comprise a series of double height curved glass bays that repeat the bay proportions of the sandstone levels below. Furthermore, the bold sandstone corners of the Education Building will also be repeated by the curved glass on the upper levels. On top of Level 8, a strong cantilevered cornice is provided to visually 'top' the building from street level, as Level 9 will be further setback and therefore will not generally be seen.

Level 9 will comprise eight rooms in total that can be configured such that the entire floor can be taken as a single occupancy, if required, and two of the rooms located to the south will have private roof terraces. The massing of Level 9 on the eastern and western sides will be terminated by a tall element (one located on each side) that is built to the maximum height of the Stage 1 envelope (ie RL 60.03). These elements will act to mark the end of the extension.

3.8.3 Public Access and Circulation

The proposed design retains the existing Bridge Street, Loftus Street and Young Street pedestrian entries into the building at Lower Ground Level. The Bridge Street entry will act as the main entrance for the public visiting the meeting and function areas within the hotel at Lower Ground Level, Basement Level 03 (i.e. the Ballroom) and the Ground Floor Level. The Loftus Street entrance will link directly to a stair case and lift lobby that will provide access to the main hotel reception area at Ground Floor Level.

The Young Street entrance is proposed to be a staff and service entry that will link to the back of house facilities at the Lower Ground Level.

The main hotel entrance will be from Farrer Place which will lead directly into the garden courtyard and main hotel reception and lobby area at Ground Floor Level. The Farrer Place entry is to be modified to include a sesame stair (or equivalent) to provide equitable access.

The vertical access arrangements include:

- the provision of four goods lifts that provide access between the basement levels, Lower Ground Floor and Ground Floor. At Levels 1-9, the location of the goods lifts remain, but only two are provided;
- the provision of two public lifts within the basement levels and at Lower Ground Level, which converts to a bank of 4 lifts at Ground Floor Level, that provide access to Level 9;
- two new grand staircases that lead from the Lower Ground Level to the Ballroom at Basement Level 1; and
- publicly accessible stairs and fire stairs at each level.

3.8.4 Conservation Works

The proposed works to the heritage fabric of the Education Building will include:

- conservation of the exterior fabric that makes a defining contribution to the overall heritage significance;
- conservation of the interior fabric that makes a defining contribution to the overall heritage significance;
- interventions to the subsurface profile of the Building;
- intervention to provide the subterranean link;
- interventions to provide publicly accessible facilities at Lower Ground Level and Ground Level;
- interventions to adapt Levels 1-5 to form guest accommodation;
- interventions to the existing Level 5 gallery into a spa and swimming pool area;
- interventions to the courtyard lightwell;
- conservation and adaptation of the western staircase;
- construction of new lift cores;
- provision of new horizontal circulation routes;
- adaptation of window openings to form door openings;
- new roof top addition;
- provision of new services;
- new colour schemes;
- new interior signage;
- heritage interpretation; and
- interventions to address the requirements of new or upgraded fire safety measures, acoustic isolation, utility requirements and modifications to meet the BCA.

3.8.5 Interior Design

In a similar vein to the Lands Building, the interior design strategy for the Education Building is driven by its unique history, design and purpose. BAR Studio has prepared an Interior Design Strategy (appended to the Architectural Design Statement at **Appendix B**), that:

- introduces the key themes for the proposed interior design strategy;
- identifies the selected feature spaces within the Lands Building;
- provides the illustrative internal materials and colour palette;
- identifies the interior design principles; and
- illustrative guest suite designs.

3.8.6 Interior Landscaping

It is proposed that the following areas will include internal landscaping within the Education Building:

- the courtyard at Ground Floor Level;
- the atrium planters located to the north, east and south of the courtyard void at Levels 2 -5;
- garden area within the northern part of Level 6;
- western terrace area at Level 9; and
- the roof and guest terraces at Roof Level.

3.8.7 Exterior Materials and Finishes

The proposed materials and finishes for the new roof extension are illustrated on the Architectural Plans (**Appendix A**) and detailed in the Architectural Design Statement at **Appendix B.** In summary they include:

- sandstone toned render – on the southern part of Level 6;
- slumped clear glass bays and bead blasted stainless steel mullions – within the northern 'Jewellery Box' area;
- slumped clear glass bays and bead blasted stainless steel mullions – within the southern glass bays;
- clear structural glass and semi-polished stainless steel panels – on the southern water villas; and
- clear structural glass with weathered copped cladding – on the eastern and western towers.

3.9 Subterranean Link

A subterranean link/ tunnel is to be provided at Basement Level 3 between the Lands and Education Buildings beneath Loftus Street. It will have a finished floor level of RL0.77.

The subterranean link will principally be used as a service corridor, whereby staff will be able to service the hotel suites within the Lands Building from the back of house facilities (i.e. housekeeping and laundry, hotel kitchen etc) within the Education Building.

The subterranean link will also include services infrastructure as discussed in Section 3.18.6 below.

3.10 Illumination Strategy

A conceptual Illumination Strategy has been prepared by Point of View and is appended to the Architectural Design Report at **Appendix B**. The general approach that will be adopted for the Lands Building includes:

- uplighting inside sculpture niches and the face of existing sculptures;
- uplighting to column facades to major windows;
- lighting to balustrades;
- uplighting to the underside of arches from spotlights mounted to ledges;
- mounting of linear LEDs to the top side of ledges to uplight cornices;
- provision of cool white illumination to the roof structure;
- mounting of linear LEDs to frieze and top face of ledge;
- provision of low profile linear LED projectors to accent the upper façade;
- provision of low profile line LED projectors to accent the main clock façade within the clock tower;
- uplighting to the mid-level clock tower columns and arches;
- provision of LED s to wash the underside of the tower cap;
- backlit clock fascia; and
- provision of cooler white tower dome to accentuate a change in materiality.

The lighting design for the Education Building includes:

- ground recessed uplights to enhance the entry portal within the rusticated podium;
- provision of in-ground uplights to illuminate the rusticated sandstone façade, which will also provide reflected light to the public domain;
- provision of low profile linear LED projectors to accent the main columns;
- provision of surface mounted accent lights to the underside of the balcony and linear LEDs to uplight the balustrade;
- provision of spot lights mounted to the top side of the balcony to illuminate the decorative carvings on the façade;
- mounting of linear LEDs to the top side of the ledge to uplight the cornice;
- mounting of linear projector LEDs to the top side of the ledge to uplight the façade and indirectly illumine the upper cornice;
- mounting of linear LEDs on the ledge to uplight scrolls;
- provision of cool colour temperature to the new façade;
- provision of surface mounted uplights to new glazed façade;
- provision of uplights to illuminate the façade cladding in between glazing on the new roof;
- integration of linear LEDs to the nose of the new roof canopy, to provide a wash of consistent light;
- provision of reflected lighting and protection of a water ripple to the underside of the upper canopy.

3.11 Conservation Management Plans

Two new Conservation Management Plans (CMPs) have been specifically prepared by GBA Heritage to accompany this Stage 2 SSDA and guide the conservation of the Lands Building and Education Building in the context of their adaptive reuse as hotel facilities. The new CMPs update the two previous CMPs prepared for the Buildings, being:

- the endorsed *Conservation Management Plan, The Lands Building* prepared by the NSW Government Architect's Office, dated March 2015; and
- the endorsed *Conservation Management Plan, Department of Education Building*, prepared by City Plan Heritage, dated March 2015.

The CMPs have been updated in response to the requirement within the NSW Heritage Council endorsement letters dated 11 May 2015 (Lands Building CMP endorsement letter) and 21 May 2015 (Education Building CMP endorsement letter) that states:

> *"Please note that if a change of use is approved, the CMP should be updated to reflect that change of use prior to detailed development applications being lodged."*

The new CMPs provide policies to guide the proposed adaptive reuse works to the buildings and GBA Heritage have been heavily involved with evolution of the proposed design and provided heritage advice throughout the entire process. The CMPs have been submitted for endorsement.

3.12 Heritage Interpretation

Heritage Interpretation Strategies for both the Lands and Education Buildings have been prepared by GBA Heritage and are included at **Appendix F**. The Interpretation Strategies provide a selection of interpretive strategies that may potentially be implemented within each Building. The proposed strategies are not limited to the building fabric, but also include the moveable heritage collection within each Building that forms part of their significance.

3.13 Public Art Strategy

A Public Art Strategy has been prepared and is included at **Appendix J**. The key objective of the Strategy is that any selected art work must not detract from the heritage significance of the Buildings, but rather complement their history and natural beauty, while evoking a sense of place and with early Sydney and its antiquity.

To best integrate art expression into the Buildings, in accordance with the City of Sydney's 'Public Art in Private Developments Guideline' a list of artists will be assembled for consideration in conjunction with the identification of proposed locations within the Buildings. Consultation will then be undertaken with the City of Sydney Council and a detailed public art plan will be prepared that will include detailed information in regard to the public art concepts, including their form, dimensions, location and materials. Lists of artists for specific works and the proposed locations will be assembled by the Art Consultant in conjunction with the Applicant.

3.14 Signage

On either side of the Bent Street entrance to the Lands Building are two signage areas. On the left-hand side, an existing bronze sign stating 'Department of Lands' exists and will be retained. On the right-hand side, there are only four fixings in the wall and no sign.

A new sign is proposed on the right-hand side, which will utilise the existing fixings, match the size, shape and materiality of the 'Department of Lands' sign, but will display the name of the hotel brand. Approval is sought for a signage zone on the

right-hand side of the Bent Street entrance and it is further requested that details of the proposed signage will be able to be submitted for approval to the Department and not require a further separate DA.

3.15 Operational Details

The proposed development incorporates a mix of uses and facilities that serve a variety of different needs and functions, including a hotel, function area, bars, restaurants and retail.

In recognition of this, a Plan of Management (**Appendix K**) sets out the overarching operational management principles and policies intended for the proposed development. Select details of the operational components are provided below.

Hours of Operation

Approval is sought for the following hours of operation:

Hotel

- 24 hours a day, seven days a week

Lands Building Lounge

- Monday to Sunday 6.30am to 10.00pm

Lands Building Lower Ground Floor Restaurants

- Monday – Sunday 7.00am to 1.00am

Lands Building Lower Ground Floor Retail

- Monday – Sunday 9.00am to 10.00pm

Education Building Bar

- Monday to Saturday 5.00pm to 2.00am
- Sunday Closed

Education Building Lounge

- Monday to Sunday 6.30am to 10.00pm

Restaurant and Bar Operation

The restaurant and bar tenancies will be operated by the hotel operator and third party operators. The appointment of third party operators will be subject to Pontiac Land Group's discretion and will be carefully curated to be in line with the positioning of the hotel and the redevelopment of the precinct.

Retail Operation

The retail tenancies will similarly be curated in line with the positioning of the hotel and the redevelopment of the Precinct. The hours of operation depend upon the nature of the retailer however the operation of the retail tenancies will be carried out in accordance with the Plan of Management.

Operational Security

The hotel will be managed by various staff including a dedicated team of security staff, who will be responsible for the security of the premises. CCTV surveillance cameras will be provided throughout all publicly accessible areas including building entry points, reception areas, function areas, bars, restaurants and the hotel corridors. All cameras will operate 24 hours a day. All security operations will be undertaken in accordance with the Security Management Plan contained within the Plan of Management at **Appendix K**.

3.16 Waste Management

Garbage rooms are provided at Lower Ground Level within the Lands Building and within the Loading Bay area at Lower Ground Level within the Education Building. Waste management on the site will be undertaken in accordance with the management and mitigation measures outlined within the Waste Management Plan at **Appendix L**.

3.17 Environmentally Sensitive Development

The proposed design is targeting the equivalent of a 4 Star Green Star Design & As Built, which is considered to be 'Australian Best Practice' however no formal rating will be pursued. Furthermore the proposed development will incorporate a number of ESD initiatives into the detailed design and operation in order to address or exceed the intent of each of the key focus areas of the GPNSW ESD Strategy for the Sandstone Precinct (as outlined in the ESD Report prepared by Arup, dated 27 November 2014 and approved as part of the Stage 1 consent.

The proposed initiatives and compliance with the ecological sustainable design provisions identified within the City of Sydney DCP 2012, the GPNSW ESD Strategy for the Sandstone Precinct and the minimum requirements of the BCA and EP&A Act are addressed in Section 5.23.

3.18 Infrastructure and Services

Wood and Grieve Engineers has prepared an Engineering Infrastructure Report (**Appendix H**) which sets out the current infrastructure available to the site and the requirements for the proposed development.

3.18.1 Electricity

The electrical supply authority is Ausgrid. The two Buildings are currently serviced by separate off-site substations and an existing Ausgrid subterranean easement is located below the Lands Building at depths ranging between RL-25.32 and RL-35.32 where the Lands Building allotment (i.e. Lot 1877 in DP877000) meets Bent Street and RL-24.77 and RL-34.77 where it meets Gresham Street.

Wood and Grieve lodged an application for Load in February 2016 with Ausgrid and Ausgrid have advised that a CBD Triplex substation is required. It is envisaged that a basement chamber substation will be established beneath Farrer Place.

3.18.2 Telecommunications

Cable plan infrastructure located within the vicinity of the site includes, Telstra, Optus, Verizon, Primas, Nextgen, and Arnet. No diversions or relocations are envisaged.

3.18.3 Water

The site is proposed to be connected to the 450mm CICL Sydney Water main which extends down Loftus Street; however this is subject to the Notice of Requirements from Sydney Water. The water connections will be 100mm for drinking water and 150mm for fire services. Whist enquiries have confirmed that water pressure and flow are adequate a 20,000 litre drinking water tank to accommodate peak flows will be provided within the development.

3.18.4 Sewer

A sewer connection is required for each building. Each connection will be 150mm and be commensurate with the fixture unit loadings that will be designed as part of the construction certificate documentation. No upgrade to the existing sewer main is required however a side line connection will be provided in accordance with Sydney Water operating guidelines. Notwithstanding this, the final sewer requirements will be determined through a Section 73 application for the Notice of Requirements, which will be submitted to Sydney Water once development consent is granted.

3.18.5 Gas

The proposed development is to be connected to an existing gas connection located in Loftus Street. Wood and Grieve consider there to be sufficient high pressure gas mains in the area to cater for the expected demand, however this is subject to confirmation from Jemina.

3.18.6 Subterranean Link

The subterranean link between the Lands Building and Education Building will include services infrastructure. A Water Services Coordinator has been appointed who is responsible for the design, negotiation and management of the coordination of Authority mains and services which may be impacted. However, following initial services searches, Wood and Grieve confirm that it will be able to be successfully located beneath the existing Bennelong SWC No 29 asset.

3.19 Construction Hours

The Construction Traffic Management Plan prepared by Sbmg Pty Ltd that is attached to the Construction Management Plan prepared by Built Pty Ltd (**Appendix M**) states that construction hours will accord with the City of Sydney's standard requirements, which restrict all potentially noisy construction activities in the City Centre to between 7.00am and 7.00pm, Mondays to Fridays, and between 7.00am and 5.00pm Saturdays.

3.20 Contributions and Voluntary Planning Agreement

Developer contributions are due pursuant to Section 61 of the *City of Sydney Act 1988*, being 1% of the cost of the proposed development.

However, the Project Team has commenced negotiations with the City of Sydney Council in regard to the level of contributions which will be provided through a Voluntary Planning Agreement. The general terms of agreement have not been finalised to date, however they will include provision for:

- public art in accordance with the City of Sydney Guidelines for Public Art in Private Development and the Public Art Policy;
- conservation of public domain features in the Bridge Street, Farrer Place Special Character Areas as outlined in the Sydney Development Control Plan 2012; and
- works in the public domain surrounding the site and Farrer Place consistent with the City's Public Domain Manual.

We note, that whilst the public domain works do not form part of this Stage 2 SSD application, it is likely that one VPA will be executed which covers the entire extent of Pontiac Land Group's proposed works and all contributions due to Council.

4.0 Consultation

Since September 2015, when Pontiac Land Group was announced as the successful tenderer in the bid to redevelop the Sandstone Precinct, the developer and its project team has undertaken extensive consultation and engagement with a wide range of key stakeholders, community groups and the public.

A consultation and engagement strategy was formulated by KJA Engaging Solutions which set out the following objectives:

- raise awareness about the Stage 2 DA, articulate the proposed quality designs for the site and emphasise the Project Team and Developer's commitment to caring for the buildings;
- ensure stakeholders were provided with accurate, consistent and timely information;
- demonstrate a commitment by the Project Team to open and transparent communication and engagement;
- provide an outline of the assessment process and expected timeframe for development; and
- establish a two-way consultation process and provide an opportunity to identify the key areas of stakeholder and community interest, and consider how potential issues and opportunities could be addressed.

The engagement process comprised two parallel processes:

1. key stakeholder meetings; and
2. broader community consultation.

The methodology of the engagement process that was undertaken with each group is provided in the following sections. In addition, greater detail is provided including a detailed account of the issues raised and the Project Team's approach and response in the Consultation Report, prepared by KJA (**Appendix N**), the Aboriginal Community Consultation Report, prepared by Curio Projects (**Appendix Q**), the Traffic Impact Assessment (**Appendix O**) and the endorsed Design Review Panel Meeting Minutes (**Appendix P**).

4.1 Key Stakeholder Meetings

Key stakeholders who should be made aware of the project and/or were likely to have points to contribute to the project were directly contacted and in most cases meetings were held. Meetings were also held with stakeholders who contacted the Project Team prior to the formal implementation of the engagement process.

The key stakeholders included the following agencies/ bodies:

- Roads & Maritime Services (RMS);
- CBD Coordination Office (Transport for NSW);
- Metro (Transport for NSW);
- Heritage Council of NSW;
- Government Property NSW;
- NSW Department of Planning & Environment;
- NSW Office of Environment & Heritage;
- City of Sydney Council;
- Greater Sydney Commission;
- Ausgrid;
- Institute of Surveyors;
- Friends of the Lands Department;
- Sydney Living Museums;
- Aboriginal Community
- National Trust of Australia;
- AMP (owners of 50 Bridge Street); and
- Dexus (co-owners of 1 Bligh Street, Governor Phillip Tower, Governor Macquarie Tower and 56 Pitt Street).

4.1.1 Aboriginal Community Consultation

In accordance with best practice NSW Office of Environment & Heritage guidelines *'Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010'*, Curio Projects undertook a process of Aboriginal community consultation. As detailed in its Aboriginal Community Consultation Report (**Appendix Q**), in line with the guidelines, Curio Projects undertook the following activities:

- placed a newspaper advertisement in the Central Courier local paper on 3 August 2016 inviting registration of local Aboriginal people who hold cultural knowledge relevant to determining the significance of the site;
- emailed a letter to relevant statutory bodies requesting a list of relevant Aboriginal people/ groups who should be consulted with respect to the project;
- compiled of a list of registered Aboriginal groups/ people and issued a letter via email or registered post, inviting their registration in the project;
- identified ten Registered Aboriginal Parties (RAPs);
- prepared a document entitled "Aboriginal Cultural Heritage Methodology and Methodology for Unexpected Aboriginal Archaeology" (**Appendix Q**). This provides general project information, the proposed methodology for the cultural heritage assessment and the proposed methodology for unexpected Aboriginal archaeology. Following its completion, it was provided to all RAPs either by post or email on 28 September 2016; and
- telephoned or emailed all RAPs to discuss the nature of the project and provide an opportunity for all RAPs to ask questions.

Following the issue of the "Aboriginal Cultural Heritage Methodology and Methodology for Unexpected Aboriginal Archaeology" report to the RAPs, RAPs were asked to provide comment and/or response within two weeks. Only two responses were received. The Aboriginal Community Consultation Report (**Appendix Q**) sets out the issues raised and Curio Projects' response. Overall however, the RAPs who made comments generally agreed with the proposed methodology.

It is the intention of the Project Team to continue to involve the RAPs in all relevant future stages of the project where issues relating to Aboriginal archaeology or Aboriginal cultural heritage arise.

4.1.2 Traffic Consultation

The following meetings were held to discuss the proposal in relation to traffic and transport:

- City of Sydney – 12 May 2016 and 6 June 2016; and
- CBD Taskforce - 24 May 2016.

Representatives of Transport for NSW and Roads and Maritime Services were present at the CBD Taskforce meeting. The design of the proposal has incorporated comments and inputs raised during consultation.

4.2 Community Consultation

Three community information sessions were held on Level 7 of the Education Building on:

- Tuesday 23 August 2016 at 8am-9am;
- Tuesday 23 August 2016 at 12pm-1pm; and
- Monday 29 August 2016 at 6pm-7pm.

The sessions were promoted at stakeholder meetings, via public notices in the Sydney Morning Herald and the local Wentworth Courier, and through an invite distributed to approximately 1800 addresses within a defined distribution area, which was agreed prior with the Department of Planning & Environment officers.

Eleven boards were displayed at the session to illustrate the design concept and heritage considerations and the Project Team was available to answer questions, respond to queries and record feedback.

The Project Team at the community consultation sessions included representatives from Sagent, Make Architects, GBA Heritage, JBA, Curio Projects, PEPR and KJA.

In addition, a project email address (sandstones@pontiacland.com) and a 1800 community information line (1800 813 969) were established on 4 August 2016.

As a result of direct requests from participants and attendees, the following was undertaken:

- PDF versions of the project boards were emailed to a number of attendees;
- MAKE Architects' contact details were made available to the attending representative form the National Trust.
- Contact details of a Lands Department security officer interested in conducting tours of the building were passed to Pontiac.
- Contact details of a community member interested in purchasing space or stakes in the hotel were passed to Pontiac Land Group.

- A visit to the third floor of the Education Building was organised for the elderly couple who had met while working in the building.
- Email responses were sent to those providing input via the project email address, thanking them for their input and encouraging them to attend one of the information sessions.

4.3 Ongoing and Future Engagement

This EIS and State Significant Development Application will be placed on public exhibition for 30 days in accordance with clause 83 of the *Environmental Planning and Assessment Regulation 2000*. During the public exhibition period Council, State agencies and the public will have an opportunity to make submissions on the project.

In addition, the project email and 1800 line will remain open and a project website will also be established. The website will include information about the project and the project email address and telephone number. Updates will also be provided to relevant stakeholders throughout the construction period.

4.4 Design Review Panel

In accordance with Condition B2 of the Stage 1 consent, a detailed brief for a Design Review Panel, in line with the requirements of Condition B2 was submitted to the Secretary on 7 June 2016 and approval of the brief was provided by Ben Lusher as the Secretary's nominee on 12 July 2016.

The Design Review Panel that was established was:

- Kerry Clare;
- Peter Mould; and
- Brian Zulaikha

The Design Review Panel met a total for four times and minutes were taken.

In addition Bruce Pettman from the Heritage Council was in attendance at three of the four Design Review Panel meetings.

Endorsed minutes of each of the four meetings are included at **Appendix P**.

5.0 Environmental Assessment

This section of the report assesses and responds to the environmental impacts of the proposed development as described in the preceding chapters of this report. It addresses the matters for consideration set out in the SEARs (refer to Section 1.8).

The mitigation measures at Section 7.0 complement the findings of this section.

5.1 Environmental Planning and Assessment Act 1979

5.1.1 State Significant Development

The EP&A Act establishes a specific assessment system to consider projects classed as State significant development (SSD). SSD is development deemed to be of significance to the State and for example includes projects located in precincts regarded as important by the NSW Government. As noted, the proposed development the subject of this DA is classed as SSD as the development is for the purpose of cultural, recreation and tourist facilities and has a CIV in excess of $100 million.

Section 83B of the EP&A Act relates to staged development applications. A staged DA is one that sets out concept proposals for the development of a site, and for which detailed proposals for separate parts of the site are to be the subject of subsequent development applications. A Stage 1 Concept Proposal was approved for the Sandstone Precinct on 25 August 2015, with consent granted for general development components and parameters.

This DA represents a detailed 'Stage 2' DA, seeking consent for the development of tourist and visitor accommodation.

Section 83D of the EP&A Act provides that while any consent granted on the determination of a staged DA for a site remains in force, the determination of any further DA in respect of that site cannot be inconsistent with that consent. The development the subject of this proposal has been prepared in accordance with the approved Stage 1 Concept Proposal (as modified) and is not inconsistent with the approved Concept Proposal (as modified).

This EIS has examined and taken into account to the fullest extent possible all matters affecting or likely to affect the environment because of the proposed development. **Table 5** provides an assessment of the proposed development against the objects of the EP&A Act. **Table 6** provides an assessment of the proposal against the matters for consideration listed in section 79C of the EP&A Act.

Table 5 – Objects of the EP&A Act 1979

Object	Comment
5(a)(i) To encourage the proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment.	The proposal responds positively to this objective by promoting the adaptive and ongoing use of two significant heritage buildings. This will create a range of broader public benefits, including increased visitor expenditure in the NSW and Sydney economies, which will have flow on benefits to the economic welfare of the community.
5(a)(ii) To encourage the promotion and co-ordination of the orderly economic use and development of land.	The proposed development involves the orderly redevelopment of the Sandstone Precinct for the provision of hotel accommodation. Given the strategic location, the proposal represents and promotes an appropriate economic use and development of the site.
5(a)(iii) To encourage the protection, provision and co-ordination of communication and utility services.	The Hydraulic, Electrical Services Engineering Infrastructure Report (Appendix H) determines that the proposed development would not impact on the provision or coordination of communication and / or utility services. Relevant utility providers have been consulted during the development of the proposal.
5(a)(iv) To encourage the provision of land for public purposes.	The proposal acts as a catalyst for the re-development of Farrer Place and the public spaces surrounding the site, to the benefit of workers and the wider community, which is the subject of a separate DA as discussed in Section 1.2.2. Further, the proposal will open up these Buildings to the public for the first time.
5(a)(v) To encourage the provision and co-ordination of community services and facilities.	The proposal supports the provision of community services and facilities.
5(a)(vi) To encourage the protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats.	The proposal is located in an urban, metropolitan CBD context which doesn't provide for an abundance of native animals and plants. However, this EIS has assessed potential environmental impacts on the surrounding public domain (such as shadow impacts) and confirmed that these are considered reasonable.
5(a)(vii) To encourage ecologically sustainable development.	The proposed development accords with the principles of Ecologically Sustainable Development, as set out in Schedule 2 of the EP&A Regulation 2000. This is further considered in Section 5.23 of this EIS.
5(a)(viii) To encourage the provision and maintenance of affordable housing.	Not applicable to the proposal.
5(b) To promote the sharing of the responsibility for environmental planning between different levels of government in the State.	Extensive consultation has been undertaken with various levels of Government and Government agencies during the preparation of this proposal, and all Government agencies will be afforded the opportunity for further input into the development process during the public exhibition process.
5(c) To provide increased opportunity for public involvement and participation in environmental planning and assessment.	The community consultation carried out assisted the development of the proposal and is detailed in Section 4.0 of this EIS. Further consultation will be carried out prior to the commencement of construction and throughout the construction period.

Table 6 – Assessment of matters for consideration in section 79C

Matter for Consideration	Comment
In determining a development application, a consent authority is to take into consideration such of the following matters as are of relevance to the development the subject of the development application: (a) the provisions of: (i) any environmental planning instrument, and	The proposal is consistent with the relevant environmental planning instruments as set out in Section 5.4.
(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Director-General has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and	The proposal is consistent with all relevant proposed environmental planning instruments which have been the subject of public consultation as set out in Section 5.4 and Section 5.4.1.
(iii) any development control plan, and	The proposal is consistent with the approved Stage 1 Concept Proposal (as modified).
(iii a) any planning agreement that has been entered into under section 93F, or any draft planning agreement that a developer has offered to enter into under section 93F, and	Refer to Section 3.20.
(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph), and	The proposed SSDA is consistent with the relevant regulations, in particular Schedule 2 of the EP&A Regulation.
(v) any coastal zone management plan (within the meaning of the Coastal Protection Act 1979), that apply to the land to which the development application relates,	No coastal zone management plan applies to the site and therefore this matter for consideration is not relevant.
(b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,	The proposal will not have any significant adverse environment, social or economic impacts which cannot be managed or mitigated. A full environmental assessment is provided throughout Section 5.0 and an environmental risk assessment is provided in Section 6.0. A detailed list of mitigation measures is provided in Section 7.0.
(c) the suitability of the site for the development,	The site is suitable for the proposed development as outlined in Section 5.24.
(d) any submissions made in accordance with this Act or the regulations,	The proposal has not yet been publicly exhibited, and therefore no submissions have been made. Consultation has been undertaken and issues raised have been dealt with in the design of the proposal.
(e) the public interest.	The proposal is in the public interest as it will provide significant benefits in regard to social, economic and environmental considerations. Further details of how the proposal is in the public interest are provided at Section 5.25.

5.2 Compliance with Planning Policies

The proposal's consistency with the relevant strategies, policies and guidelines as set out in the SEARs is addressed in **Table 7.**

Table 7 – Consistency with relevant strategies, policies and guidelines

Instrument/Strategy	Comments
Strategic Plans	
NSW State Priorities	'*NSW 2021 A Plan to Make NSW Number One'* is the State Government's 10 year plan to guide policy and decision making across the State. One of the underlying, central themes of the strategy is to improve the performance of the NSW economy, with a 'priority action' being: *"Increase tourism in NSW with double the visitor expenditure by 2020"* The *Visitor Economy Industry Action Plan* (December 2012) is a key initiative from the NSW 2021 Strategy that identifies specific actions for the government to implement over the next few years. Amongst other initiatives, the following actions are recommended to the Government: ▪ "Introduce specific incentives and remove unnecessary regulatory/approval procedures and requirements to encourage adaptive re-use and preservation of heritage buildings" ▪ "Investigate options to provide incentives, such as planning bonuses and tax offsets for tourism investment in new projects, as well as refurbishments and improvements that enhance the visitor experience and quality of existing product offerings" ▪ "Increase the use of planning incentives and land use controls to stimulate tourism development, especially for visitor accommodation and attraction investment" This proposal will provide a new world class luxury hotel that will undoubtedly make a significant contribution to the tourism facilities within Sydney.
A Plan for Growing Sydney	The proposal is consistent with the Plan in that it will: ▪ Support the utilisation of the site for tourist and visitor accommodation and thus strengthen and support the service sector. ▪ Provide employment opportunities during the construction and operation of the proposed development. ▪ Contribute to the strengthening of 'Global Sydney' as a centre for economic, educational, medical, creative and cultural activity. ▪ Provide tourist and visitor accommodation in close proximity to Sydney's prime tourist precinct. ▪ Contribute to the enhancement of Sydney's day and night economy.
NSW Long Term Transport Masterplan	The proposal is consistent with the Masterplan in that it will: ▪ encourage public transport use by providing visitor accommodation in close proximity to light rail, rail, bus and ferry services; and ▪ support a reduced reliance on private vehicles, assisting in improving the modal split between cars and public transport.
Planning Guidelines for Walking and Cycling	The proposal is consistent with the *Planning Guidelines for Walking and Cycling* in that the location is highly accessible to key tourist destinations and will promote tourists and visitors to walk as opposed to reliance on vehicular transport.
Sustainable Sydney 2030	The proposal is generally in accordance with the Strategy in that it will: ▪ contribute to a lively and engaging city centre by making the heritage buildings accessible to the public; ▪ support sustainability objectives through adaptive re-use of heritage buildings; ▪ contribute to the cultural legacy of Sydney with a landmark redevelopment of two iconic heritage buildings; and ▪ encourage public transport use by providing visitor accommodation in close proximity to light rail, rail, bus and ferry services.
City of Sydney City North Public Domain Plan	The proposal is consistent with the Strategy in that the only works proposed in the public domain are restricted to the subterranean levels below Loftus Street. The proposal is not inconsistent with Strategic vision for Loftus Street, Young Street, Gresham Street or Farrer Place.

Instrument/Strategy	Comments
Sydney City Centre Access Strategy	The proposal is consistent with the Sydney City Centre Access Strategy in that it contributes to providing hotel accommodation within walking/cycling distance from services, facilities and key tourist destinations.
Sydney's Cycling Future	The Sandstone Precinct is located within close proximity to the proposed cycleway on Pitt Street and as such will provide the users of the development the opportunity to cycle.
Sydney's Walking Future	The proposal contributes to providing a hotel accommodation use within walking distance from services, facilities and key tourist destinations. The introduction of the light rail project on George Street will provide increased opportunities for an improved pedestrian environment.

5.3 Compliance with Environmental Planning Instruments & Plans

5.3.1 State Environmental Planning Policies

The proposal's consistency and compliance with the relevant State Environmental Planning Policies is summarised in **Table 8**.

Table 8 – Consistency with State Environmental Planning Policies

Instrument	Comments	Consistent
SEPP 55 (Remediation of Land)	Clause 7 of SEPP 55 specifies that a consent authority must not consent to the carrying out of any development on land unless it has considered whether land is contaminated and if the land is contaminated, it is satisfied that the land is/can be suitable for the proposed development. A preliminary contamination assessment was undertaken to inform the Stage 1 consent which concluded that due to the historical use of the site and that the structures on the site have generally unchanged since their original construction, the potential for significant contamination is relatively low. It is proposed that further testing will be undertaken prior to excavation. Overall, it is considered that the site is suitable for the proposed development.	✓
SEPP 64 (Advertising and Signage)	As discussed in Section 3.14 a new sign is proposed on the right hand side of the Bent St entrance into the Lands Building. The new sign will utilise the existing fixings and generally match the size, shape and materiality of the 'Department of Lands' sign that existing on the left hand side. Approval is sought for a signage zone only. Under clause 4 of SEPP 64, a consent authority must not grant consent for any signage application unless the consent authority is satisfied that the proposal is consistent with the aims and objectives of the SEPP and with the assessment criteria contained in Schedule 1. To ensure compliance with the aims and objectives of the SEPP, the finalised design for the sign will ensure that the proposed business identification sign will be compatible with the 'Department of Lands' sign and be of a high quality design and finish. Furthermore, the proposed signage satisfies the assessment criteria in that: ▪ The proposed sign is to be very modest and classical in scale, nature and form and will be compatible with the existing character of the Sandstone Precinct and will simply replace a sign that has in the past been removed. ▪ The proposed sign will not detract from the visual quality of the Lands Building and will be integrated with the existing building in a similar manner to the existing' Department of Lands' sign. ▪ The proposed sign will not be illuminated and will not distract from essential sightlines or create safety risks.	✓

Instrument	Comments	Consistent
Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005 (deemed SEPP)	The site is identified as being within the Sydney Harbour Catchment under the Sydney Harbour Catchment REP. The site is not within the Foreshores and Waterways Area. There are no specific provisions in the REP that apply to the determination of a DA for land that is in the Sydney Harbour Catchment but not the Foreshores and Waterways Area. However, clause 2 of the REP contains a set of aims (clause 2) relating to the Sydney Harbour Catchment. The proposal is consistent with those aims because: - The proposal is unlikely to affect the natural features of the catchment, foreshores, waterways and islands of Sydney Harbour, provided appropriate environmental management measures are implemented (as set out in the Construction Management Plan at Appendix M); - The proposal will address the inherent conflict of the public administration buildings being closed to the public they serve, by facilitating public access to these outstanding assets of State heritage significance; - The proposal has been designed in accordance with the principles of ecologically sustainable development (see the ESD Report at Appendix R); and - The proposal will provide a culturally rich and vibrant place for people.	✓
SEPP (Infrastructure) 2007	Clause 88 of the State Environmental Planning Policy (Infrastructure) 2007 applies to any site that is within or adjacent to an interim rail corridor that involves excavation of 2m or more, or has a capital investment value of more than $200,000 and involves the erection of a structure that is 10 or more metres high or an increase in the height of a structure so that it is more than 10m. The site sits above an interim rail corridor and the proposal will involve the development of a subterranean space below the buildings including adjacent public and road reserves. Further an addition in excess of 10 metres is sought above the Education Building. Clause 88 requires written notice of the application to be given to Transport for NSW.	✓
SEPP (State & Regional Development) 2011	Pursuant to the SEPP development for tourist related purposes will be SSD if it has a capital investment value (CIV) of $100 million or more. The proposed development has a CIV of over $100 million, and is therefore identified as SSD and considered to be development of State and/or Regional Significance. This EIS has accordingly been prepared in support of the DA.	✓

5.3.2 Sydney Local Environmental Plan 2012

Sydney Local Environmental Plan 2012 (the Sydney LEP 2012) is the principal local environmental planning instrument applying to the site. A summary of the proposal in relation to the LEP is provided at **Table 9** below.

Table 9 – Summary of consistency with Sydney LEP

Plan	Comment	Consistent
Clause 2.1 Land Use Zone	The site is zoned B8 Metropolitan Centre (including Loftus Street). The proposed development is for the purpose of tourist and visitor accommodation with ancillary food and drink premises and retail premises. These uses are consistent with the objectives of the zone and are permissible with development consent.	✓
Clause 4.3 Height of Buildings	The maximum permissible building height is the height of the buildings as at the commencement of the Sydney LEP 2012 – i.e. 14 December 2012. This is essentially the current height of the buildings. A building survey confirms the heights of the existing buildings are: - Education Building – RL60.03 to the top of the existing ladder structure; and - Lands Building – RL82.14 to the top of the clock tower. The proposal does not exceed the height of the existing buildings. Building height is further discussed at Section 5.6.1.	✓
Clause 4.4 Floor Space Ratio	The maximum permissible FSR on site is 8:1. The proposal has a floor space ratio (FSR) of: - Lands Building – 3.3:1 - Education Building – 7.5:1	✓
Clause 5.10 Heritage Conservation	The buildings are heritage items listed under Schedule 5. The proposal will conserve the heritage significance, significant fabric and setting of the buildings. A Heritage Impact Assessment (Appendix F) and Conservation Management Plan (Appendix F) have been prepared in support of the proposal. Heritage is further discussed at Section 5.8.	✓
Clause 6.4 Accommodation Floor Space	The proposal does not seek to apply accommodation floor space.	N/A
Clause 6.21 Design Excellence	As the proposal has a capital investment value of more than $100,000,000, a competitive design process is ordinarily required under clause 6.21. Clause 6.21 however provides certain circumstances where a competitive design process may not be warranted, including where it is deemed unreasonable or unnecessary in the circumstances. In assessing the Stage 1 DA, the Department of Planning considered that a formal competitive design process was not warranted for the following reasons: - The internal works to both buildings must be designed in accordance with the endorsed Conservation Management Plans, which provide a high level of guidance; - The proposed addition above the Education Building does not involve any elements above the existing height of the building; - The proposal will not result in a significant increase in GFA in the context of the existing development; - The proposal will not have any significant impacts on adjoining buildings in terms of overshadowing, outlook or privacy; and - The proposed envelope is setback from the edges of the Education Building and subject to detailed design has the potential to introduce a new architectural form that is subservient to the existing sandstone fabric	✓

Plan	Comment	Consistent
	when viewed from public places including Macquarie Place and Farrer Place. However, the Department considered that a Design Review Panel should be established to provide advice and input into the Stage 2 detailed design to ensure that design excellence is achieved. A Design Review Panel has been established and the panel has provided extensive guidance throughout the development of the proposal. Section 4.4 and Section 5.5 of this EIS explains the process for establishing the panel and how the current design has responded to the panel's feedback. The proposal that is now the subject of this Stage 2 DA achieves design excellence, having regard to the matters in clause 6.21(4). This is discussed further in Section 5.5.	
Division 1 Car Parking Ancillary to Development	The proposal does not include on-site car parking.	N/A

5.3.3 Sydney Development Control Plan 2012

It is noted that despite the SEARs, development control plans are not a matter for consideration in the assessment of SSD DAs by virtue of Clause 11 of SEPP SRD, which states that 'Development control plans…do not apply to…State significant development'.

Notwithstanding this, an assessment of the proposed development against the relevant provisions of Sydney DCP 2012 is provided at **Table 10** below.

Table 10 – Relevant provisions of Sydney DCP

Plan	Comment
2.1.5 Bridge Street/Macquarie Place/Bulletin Place Special Character Area	The northern half of the site is within the Bridge Street/Macquarie Place/Bulletin Place Special Character Area. The proposal is consistent with the locality statement and relevant principles for this Character Area as: - The development retains the cohesive group of landmark sandstone buildings currently occupying the site. The important vista to the Conservatorium of Music from Bridge Street is retained; - The proposal recognises the site's historical importance by retaining and/or reinterpreting important heritage features of the site. This is discussed further in the Statement of heritage Impact at Appendix F and Section 5.8 of the EIS. - The proposal maintains the important intersections and corners defined by the existing Lands and Education Buildings; - The proposal will not affect views to the water from public places, and will barely change existing views to the water from the upper levels of 1 Bligh Street due to the existing Bridgeport Apartments to the north of the site. The proposal will also maintain significant vistas to the Lands Building from Loftus Street, Macquarie Place and Bridge Street itself.
2.1.13 Farrer Place Special Character Area	The southern half of the site is within the Farrer Place Special Character Area. The proposal is consistent with the locality statement and relevant principles for this Character Area as: - The development reinforces the urban character and sense of enclosure of Farrer Place as the existing street alignment of the existing buildings will remain unchanged. - The development does not create substantial additional overshadowing of Farrer Place during winter lunchtime hours. Shadowing is addressed further in Section 5.6.2. - The proposal will maintain existing views to the north and vistas to the tower of the Lands Department building from public places. The principles for this Character Area also require development to improve, enhance and activate the public domain. As explained in Section 1.2.2 of this EIS, a separate DA will be lodged with the City of Sydney for the upgrade of the Farrer Place public domain. This principle will be

Plan	Comment
	addressed in that DA.
3.1.5 Public Art	The Public Art strategy is discussed at Section 3.13.
3.2.3 Active Frontages	The DCP requires active frontages along the Bent Street and Farrer Place frontages of the site. While this is difficult to fully achieve given the existing heritage fabric, the proposal will reinforce the sense of vitality and liveliness of the public domain. The Education Building will include a bar and restaurant at the Ground Floor Level that fronts Farrer Place. A hotel entry and reception lounge is located at the Ground Level of the Lands Building at Bent Street. A retail space is proposed on the Lower Ground Level at the corner of Bent and Gresham, that will further activate the frontage.
3.9 Heritage	The Buildings are heritage items under Schedule 5 of the LEP. A Heritage Impact Statement is provided at Appendix F that addresses the heritage significance of the buildings and outlines the impact of the proposal on the heritage significance of the buildings. As the use of the heritage items will change, updated conservation management plans have been prepared for the buildings (Appendix F).
3.15 Late Night Trading	The site falls within the Late Night Management Area under the DCP. The proposed bar is categorised as a Category B - Low Impact Premises as it will have an on-premises licence within the meaning of the Liquor Act 2007. Indoor base trading hours of 7am to 1am are permitted for Category B premises in the Late Night Management Area. As the proposed Education Building Lounge and Lands Building Lounge operates within the permitted base hours under the DCP, no extended trading hours or a trial period are required. The Education Building bar seeks approval to operate between 5pm and 2am Friday and Saturday evenings. Base indoor trading hours are 7am to 1am. Approval for extended trading is therefore sought subject to a trial period. A Plan of Management is attached at Appendix K.
4.4.8 Visitor Accommodation	The proposal is self-contained with a 24 hour a day manager located on site. A Plan of Management is provided at Appendix K. The plan outlines how noise will be managed on site and sets maximum stay requirements for guests. All hotel rooms meet the minimum dimension requirements under this clause.
5.1.2 Building Setbacks	The DCP requires new additions above heritage items to have a setback of at least 10 metres The Stage 1 concept established an envelope for the proposed roof extension to the Education building. Whilst the proposed design does not comply with the 10m setback provision of the DCP, as demonstrated in Section 5.4, the new roof extension does not encroach the boundaries of the approved envelope in terms of setbacks.

5.4 Consistency with Stage 1 Consent

In accordance with Section 83D of the EP&A Act, the determination of any development application in respect of a site that is subject to a Stage 1 DA 'cannot be inconsistent' with the original consent.

Accordingly, the proposed development is consistent with the key development parameters of the Stage 1 consent in that:

- it seeks approval for the conversion and adaptive re-use of the Lands and Education Buildings to provide a world-class luxury hotel;
- the proposed roof extension to the Education Building does not exceed 3 storeys; and
- the proposed subterranean link does not exceed the boundaries of the indicative subterranean building envelope.

Whilst the proposed development has been designed to be generally consistent with the Stage 1 consent, there are a number of minor inconsistencies between the Stage 2 proposal and the Stage 1 consent. As set out in Section 1.2.1, a Section 96(2) modification application is submitted concurrently with this Stage 2 SSDA to rectify this situation.

At the time of lodgement, the Stage 2 proposal is inconsistent with the following development parameters:

- the maximum height of the Education Building envelope; and
- the proposition of a replacement ancillary roof structure on top of the Lands Building.

These inconsistencies are addressed in further detail below.

Height of the Education Building Envelope

The Stage 1 Consent established that the maximum height of the envelope of the Education Building could not exceed the height of the upper most structure of the existing building, which was established to be RL 58.69. During the development of the Stage 2 design, a more detailed building survey revealed that the height of the upper most structure of the existing building is RL60.03 which is the top of the existing ladder structure and it became apparent that the roof structure needed to be designed to this height.

The difference in height is 1.34m and a comparison between the approved Stage 1 envelope, proposed modified Stage 1 envelope and the ultimate Stage 2 form is presented in **Figures 42** and **43**. As set out in the Section 96 modification application, this minor increase in building envelope height is considered acceptable for the following reasons:

- the proposed increase is minor and represents a 2% increase in the overall building height;
- the proposed variation to the maximum height will not give rise to any detrimental visual or overshadowing impacts; and
- the proposed variation in height will facilitate the provision of the proposed refined and sophisticated Stage 2 roof extension design, which:
  - is cleverly articulated and does not take up the full extent of the roof extension envelope;
  - has been endorsed by the Design Review Panel following considerable scrutiny; and
  - demonstrates design excellence.

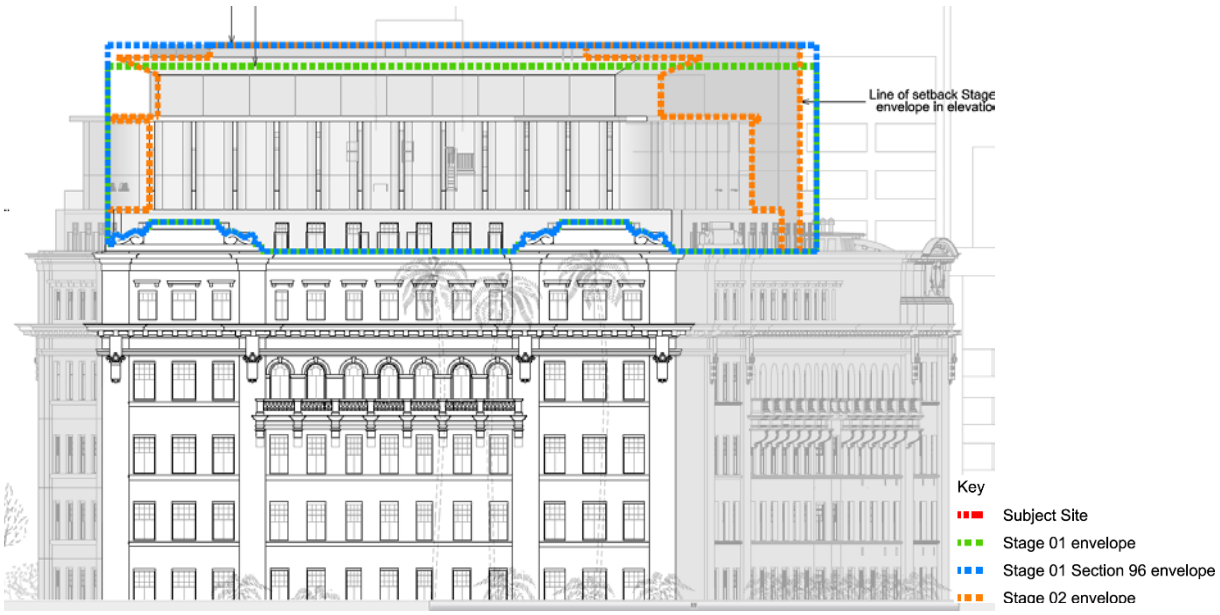

Figure 42 – Education Building Elevation Concept Envelope Assessment
Source: MAKE

Figure 43 – Education Building Plan Concept Envelope Assessment
Source: MAKE Architecture

Provision of a new ancillary roof the Lands Building

The EIS accompanying the Stage 1 concept proposal did not seek to establish a building envelope above the Lands Building, but did propose that opportunities for new building works to enhance the use of the roofscape would be explored.

Given that no particular envelope was established for the roof and to ensure that the proposed works to the roofscape of the Lands Building, as proposed within this SSDA, is consistent with the Stage 1 concept, the Section 96(2) modification application seeks to include an envelope for the new ancillary roof structure. The proposed envelope is depicted in **Figures 44** and **45** below.

Overall, the decluttering of the existing ad hoc additions to the roof of the Lands Building and the provision of a new contemporary roof will provide a better outcome for the Lands Building as discussed in Sections 3.7 and 5.8.

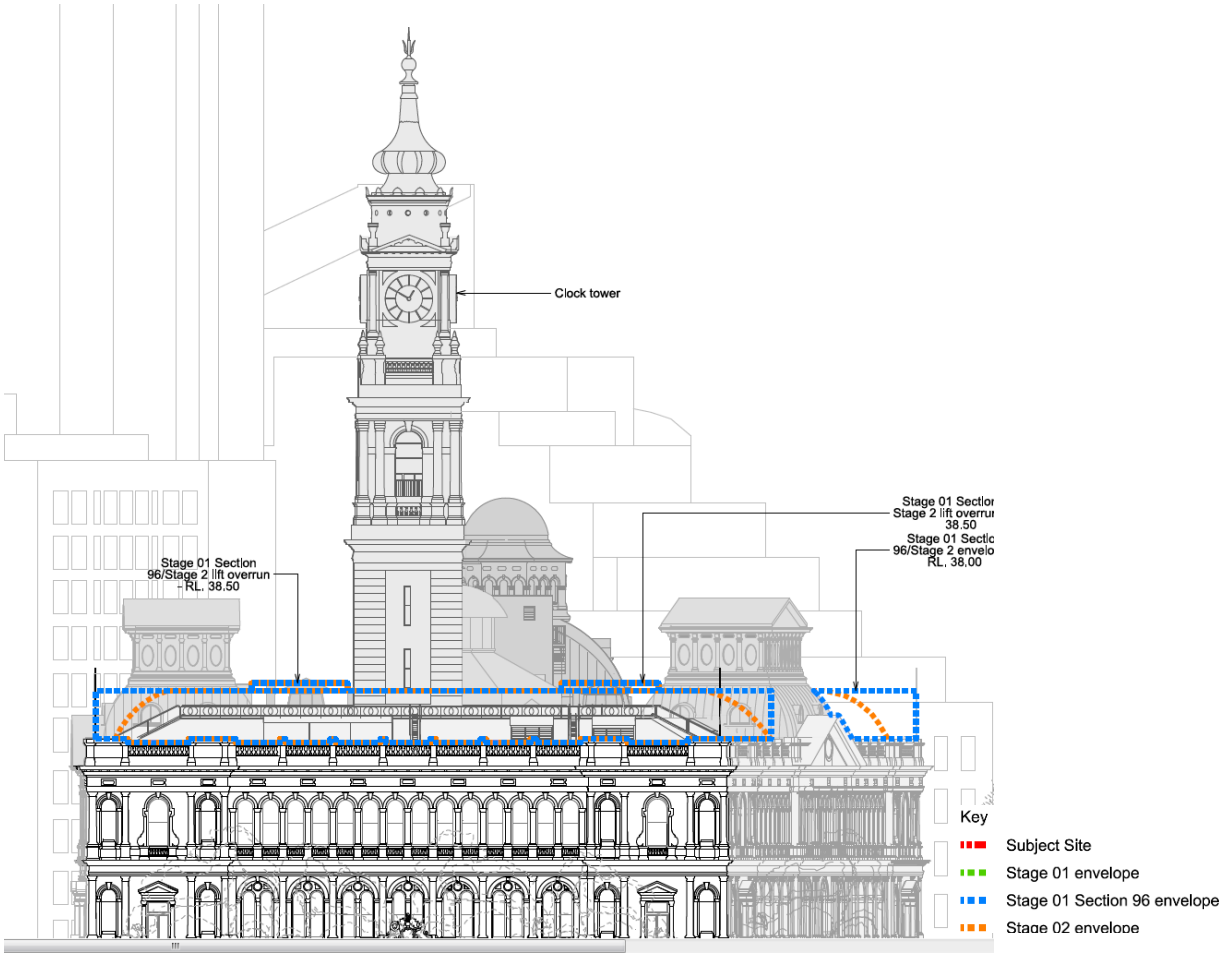

Figure 44 – Lands Building Elevation Concept Envelope Assessment
Source: MAKE Architecture

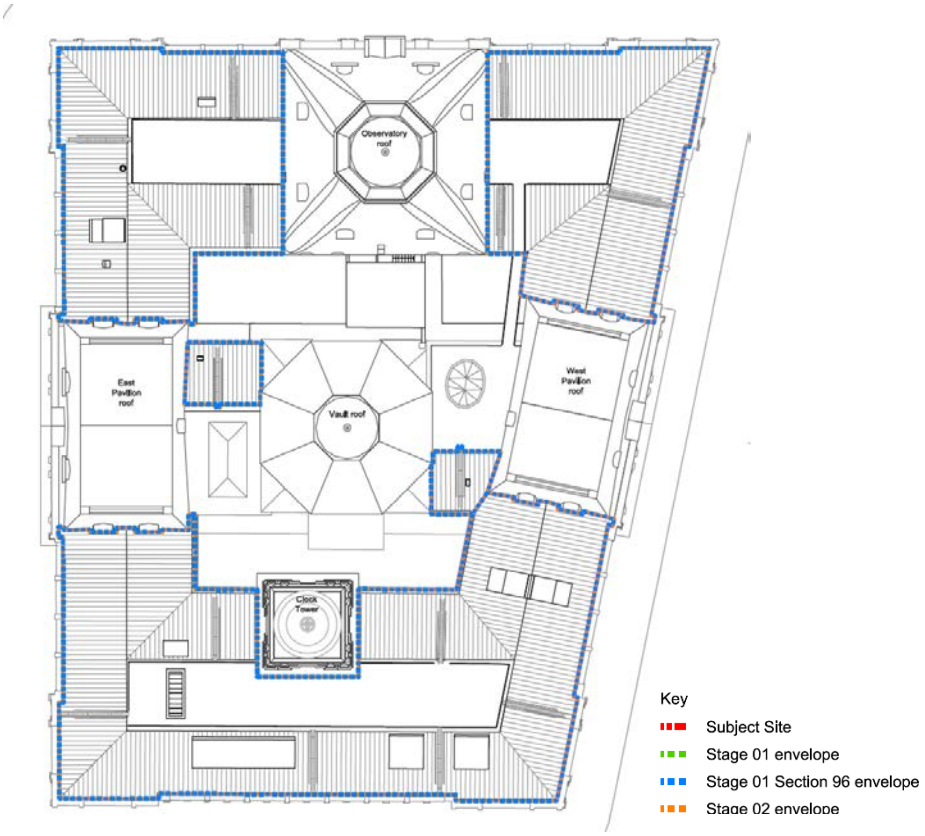

Figure 45 – Lands Building Plan Concept Envelope Assessment
Source: MAKE

Table 11 below identifies where relevant conditions in the Stage 1 consent have been addressed, and demonstrates that the proposal is generally consistent with the Stage 1 consent.

Table 11 – Assessment of consistency with Stage 1 consent approval

	Instrument of Approval	Consistency
PART B – CONDITIONS TO BE MET IN FUTURE DEVELOPMENT APPLICATIONS FOR STAGE 2		
B1	Built form and design quality Future Development Applications shall ensure that development above the existing parapet of the Education Building achieves a high quality design and:	✓ Refer to Section 5.5 And Appendix B
a)	gives consideration to increased setbacks and articulation within the building envelope, particularly from the southern façade to minimise visual impacts of the addition from Farrer Place and maintain the visual prominence of the existing building, and the legibility of its composition, architectural style, form and features;	
b)	minimises potential overshadowing of the 1 Bligh Street steps during the core lunch period of 12 noon to 2 pm in mid winter;	
c)	presents as a contemporary projection of the existing building and be visually subservient to the existing building;	
d)	uses materials and detailing that respect and are submissive to the heritage sandstone facades of the Education Building; and	
e)	maintains the legibility of the existing light well as a central element with clear views to the sky	
B2	A Design Review Panel shall be established by the applicant prior to the lodgement of any Future Development Application. Prior to the establishment of the Design Review Panel the applicant shall prepare and submit the following for the Secretary's approval:	✓ Refer to Section 4.4 and Section 5.5

	Instrument of Approval	Consistency
a)	a detailed brief for the Design Review Panel which clearly outlines: ▪ the project details including design objectives and requirements as outlined in the endorsed Conservation Management Plans and conditions of approval; and ▪ the purpose and role of the Design Review Panel which includes reviewing and providing input and feedback to the detailed design to ensure achievement of the design objectives and requirements.	
b)	the members selected for the Design Review Panel which shall comprise a minimum of three independent design advisors that have appropriate experience with adaptive re-use and heritage conservation projects, and also an understanding of the functionality and commerciality of tourism accommodation projects.	
	Any future Stage 2 Development Application proposal shall be endorsed by the Design Review Panel.	✓ Refer to Section 5.5 and Appendix P
B3.	Internal works Detailed guidelines for necessary upgrades to comply with the National Construction Code shall be developed in consultation with the NSW Heritage Council prior to submission of any Future Development Application.	x This condition is to be modified under the Section 96 application, as it is too premature to be able to establish how every element within the Buildings will be upgraded to comply. Refer also to Section 5.16 for the strategy.
B4	Heritage and Archaeology Future Development Applications shall comply with the endorsed Conservation Management Plans for the Department of Education Building prepared by City Plan Heritage dated March 2015 and the Lands Building prepared by the NSW Government Architect's Office dated March 2015.	x This condition is to be modified under the Section 96 application as the endorsed CMPs are now out of date and have been replaced by the new GBA Heritage CMPs which are included in this SSDA at Appendix H.
B5	Future Development Applications shall include a detailed Heritage Impact Assessment and a Heritage Interpretation Strategy for the proposed works.	✓ Refer to Section 5.8 and Appendix F
B6	Future Development Applications involving any excavation shall include a detailed aboriginal and historical archaeology assessment which includes an assessment of the urban archaeological site, impact assessment, proposed mitigation measures and proposed preservation processes. This shall be undertaken in close consultation with the local Aboriginal community group.	✓ Refer to Section 5.9 and Appendix Q
B7	Prior to lodgement of Future Development Applications, the Applicant shall consult closely with City of Sydney Council and NSW Heritage Council to ensure the proposal is appropriately designed to minimise heritage impacts.	✓ Refer to Section 5.8 Appendix F Appendix N
B8	Subterranean Space Future Development Applications that involve the development of any subterranean space within the public or road reserve shall include an agreement with the owner of this land for development of that space prior to the determination of the application.	Discussions are on-going with the City of Sydney in regard to achieving an agreement.
B9.	Future Development Applications involving any excavation shall include detailed geotechnical and structural investigations to ensure the development does not impact on future rail tunnels.	✓ Refer to Section 5.20 and Appendix I

	Instrument of Approval	Consistency
B10	Utilities Future Development Applications shall include detailed investigations and assessment of the impact on utilities.	✓ Refer to Section 5.21 and Appendix H
B11	Noise and Management Future Development Applications shall address potential operational noise and construction noise impacts, and soil, water and waste management.	✓ Refer to Section 5.12.1, Section 5.12.2, Section 5.13 and Section 5.18
B12	Flooding and stormwater Future Development Applications shall include a Flood Impact Assessment report including a flood hazard management plan	✓ Refer to Section 5.13.2 and Appendix U
B13	Environmental Performance Future Development Applications will demonstrate the incorporation of Ecological Sustainable Development principles in the design, construction and ongoing operation phases of the development as per the ESD report prepared by ARUP dated 27 November 2014.	✓ Refer to Section 3.17, Section 5.23 and Appendix R
B14	Traffic and Transport Future Development Applications shall provide bicycle access and servicing in accordance with Sydney Development Control Plan 2012.	× This condition is to be modified under Section 96 application.
B15	Future Development Applications shall include a loading dock management plan that will detail servicing requirements.	✓ Refer to Section 5.10 and Appendix O
B16	Construction Future Development Applications shall provide analysis and assessment of the impacts of construction and include:	✓ Refer to Section 5.22 and Appendix M
a)	Construction Transport Management Plan, addressing traffic and transport impacts during construction;	
b)	Cumulative Construction Impact Assessment (i.e. arising from concurrent construction activity);	
c)	Noise and Vibration Impact Assessments, addressing noise and vibration impacts during construction;	
d)	Community Consultation and Engagement Plans, addressing complaints during construction;	
e)	Construction Waste Management Plan, addressing waste during construction;	
f)	Air Quality Management Plan, addressing air quality during construction;	✓ Refer to Section 5.19 Appendix H and Appendix AA
g)	Water Quality Impact Assessments and an Erosion and Sediment Control Plan (including water discharge considerations) in accordance with 'Managing urban stormwater, soils and construction (Landcom 2005)'; and	✓ Refer to Section 5.13.1 and Appendix U
h)	Acid Sulphate Soil Assessment and Management Plan.	✓ Refer to Section 5.22 and Appendix M
	The plans referred to above may be prepared as part of a construction environmental management plan which is prepared and implemented under the conditions of any consent granted by Future Development Applications.	

5.5 Design Excellence

Under Clause 6.21 of Sydney LEP 2012, development with a CIV over $100 million is required to undertake a competitive design process. However, clause 6.21(6) provides certain circumstances where a design competition may not be required. The criteria include:

- where a proposal involves alterations or additions to an existing building, and
- does not significantly increase the height or gross floor area of the building, and
- does not have any significant adverse impacts on adjoining buildings and the public domain, and
- does not significantly alter any aspect of the building when viewed from public places a competitive design process.

Within the State Significant Development Assessment Report for the Stage 1 consent, the Department considered that it would be unreasonable and unnecessary to require a formal a design excellence process to be undertaken for the internal works to the buildings given the high level of guidance provided by the Conservation Management Plans (CMPs) and the requirement to undertake any works in accordance with those CMPs.

Notwithstanding this, the Department considered that a design excellence process should be carried out as part of the Stage 2 design for the proposed additional envelope above the Education Building, but considered that a formal competitive process was not necessary and that instead design excellence could be ensured by the establishment of a Design Review Panel by the applicant.

As noted in Section 4.4, in accordance with Condition B2 of the Stage 1 consent, a detailed brief for a Design Review Panel was submitted to the Secretary on 7 June 2016 and approval of the brief was provided by Ben Lusher as the Secretary's nominee on 12 July 2016.

Design Review Panel members comprised Kerry Clare, Peter Mould and Brian Zulaikha. In addition, Bruce Pettman, Principal Heritage Architect for the Government Architect's Office, in his role as a member of the NSW Heritage Council's approvals sub-committee was in attendance.

A total of four Design Review Panel meetings were held, whereby highly detailed and comprehensive presentations of the proposed designs to the Lands Building, Education Building and Farrer Place were made by MAKE. Throughout the presentations the Design Review Panel members asked questions, discussed and suggested alternative treatments to certain elements of the design. Meeting minutes were taken and circulated following the meetings and the Panel responded with written advice. The comments and suggestions made by the Design Review Panel at each of the meetings were then reviewed and considered in the evolution of the detailed design. By the end of the process, the Design Review Panel confirmed that they were comfortable and very supportive of the direction of the proposed design for the buildings and Farrer Place.

The endorsed minutes of each meeting are included at **Appendix P**.

Furthermore, Sydney LEP 2012 requires a consent authority to have regard to certain matters in forming their view that a development exhibits design excellence. For completeness **Table 12** demonstrates that the proposed development has addressed all these matters.

Table 12 – Compliance with Clause 6.21(4) of SLEP 2012

Requirement		Response
(a)	whether a high standard of architectural design, materials and detailing appropriate to the building type and location will be achieved.	The Architectural Design Statement at Appendix B, demonstrates that a high standard of architectural design, materials and detailing will be delivered.
(b)	Whether the form and external appearance of the proposed development will improve the quality and amenity of the public domain.	The proposed modifications to the roofscape of both the Lands and Education Buildings will provide a 'fifth' façade to the appearance of the Buildings from the taller surrounding buildings. The Visual Impact Assessment (Appendix B) confirms that the proposed glazed roof structure on the Lands Building will generally not be visible from the streetscape or surrounding public domain areas such as Farrer Place, however where it will be seen it will improve the appearance of the Building. Furthermore, the Education Building roof extension presents a high quality, light weight, articulated structure which is subservient to the solid massing of the sandstone base, which will clearly identify the Building as a new luxury hotel.
c) whether the proposed development detrimentally impacts on view corridors.		As demonstrated in the Visual Impact Assessment (Appendix B), and addressed in Section 5.7 of the EIS, the proposed development will not detrimentally impact upon any view corridors.
d) how the proposed development addresses the following matters:		
i)	The suitability of the land for development.	The site is suitable for the development as discussed at Section 5.24.
ii)	The existing and proposed uses and use mix.	The existing use of the building as office accommodation is outdated and underutilised. The proposed use meets an identified need for tourist and visitor accommodation as recognised by the approval of a Stage 1 concept development application which established that the proposed adaptive re-use of the building is appropriate.
iii)	Any heritage issues and streetscape constraints.	Heritage impacts are addressed in Section 5.8. The proposed development does not give rise to any adverse streetscape impacts as proposed modifications to the roof of the Lands Buildings will largely not be visible from the street, and the additional levels above the Education Building have been designed to be subservient to the existing sandstone base and complementary to the contemporary architecture of the adjacent Governor Philip Tower and 1 Bligh Street.
iv)	The location of any tower proposed, having regard to the need to achieve an acceptable relationship with other towers (existing or proposed) on the same site or on neighbouring sites in terms of separation, setbacks, amenity and urban form.	No tower is proposed as part of the development application. Any potential impacts upon the amenity of nearby residents are addressed within Section 5.6.
v)	The bulk, massing and modulation of buildings.	Refer to Section 5.6.
vi)	Street frontage heights.	The street frontage height of both Buildings is not being amended by the proposed development.
vii)	Environmental impacts, such as sustainable design, overshadowing and solar access, visual and acoustic privacy, noise, wind and reflectivity.	All potential impacts are addressed within Section 5 of this EIS. No adverse impacts that cannot be effectively mitigated will arise.

viii)	The achievement of the principles of ecologically sustainable development.	Section 5.23 demonstrates that the proposed development achieves ecologically sustainable development.
ix)	Pedestrian, cycle, vehicular and service access and circulation requirements, including the permeability of any pedestrian network.	The proposed development does not propose any amendments to the pedestrian, cycle or public transport network. Furthermore, while the existing vehicular access into the loading dock within the Lands Building is proposed to be removed, no car parking is proposed within the development and due to the provision of the subterranean tunnel both buildings will be able to be serviced from the retained loading dock within the Education Building. Refer to Section 5.10.
x)	The impact on and any proposed improvements to the public domain.	As part of the overall package of works being undertaken within the Sandstone Precinct, public domain improvement works will be undertaken to Farrer Place and the pavements on Loftus Street, Gresham Street, and Young Street. Approval of these works will however be part of a separate DA which is to be submitted to the City of Sydney Council.
xi)	The impact on any special character area.	As set out in Section 5.3.2, the proposed works will not adversely impact upon any special character area.
xii)	Achieving appropriate interfaces at ground level between the building and the public domain.	The designs for the Buildings and Farrer Place have evolved together to ensure that there is an appropriate interface between and integration of the public and private domain areas. In addition, this was a key issue which arose when the designs were presented to the Design Review Panel, which lead to significant alterations to the proposed design for Farrer Place. As stated above, a separate DA is to be submitted to the City of Sydney for works to Farrer Place.
xiii)	Excellence and integration of landscape design.	

5.6 Built Form

The external built form of both the Lands and Education Buildings will largely be retained and only the roofscapes of both Buildings will be altered by the three storey extension to the Education Building and the replacement curved gridshell roof elements to the Lands Building.

Both roofscapes exhibit a high architectural and design quality, as demonstrated in the Architectural Design Report (**Appendix B**), that not only will provide the sought-after 'fifth façade' to each Building to the benefit of surrounding developments, but also enables the Buildings to provide additional habitable space and display the fact that they have been revitalised.

Internally, the design carefully converts the Lands Building from an office building, to a luxury hotel, whilst retaining a significant amount of existing heritage fabric and celebrating feature spaces, such as the Carriage Route, Strong Room vault, central light wells, Clock Tower, Domes and tempietti towers on the roof.

The Education Building design also carefully converts it into the 'Grand Hotel' vision established at the beginning of the project and delivers a development that fully complies with the provisions set out in Condition B1 of the Stage 1 consent.

5.6.1 Height and Bulk

As demonstrated in **Figures 42** and **43** (refer to Section 5.4) and the photomontages, the Education Building roof structure generally complies with the approved massing and setbacks approved within the Stage 1 envelope and provides a highly articulated and contemporary, but subservient structure that utilises finer grained and lightweight materials to contrast with the sandstone base of the original Building.

Furthermore, the replacement roof on the Lands Buildings will declutter the roof and act to celebrate the significant features of the roof, being the clock tower, domes, and towers.

In the event that the roofscapes of the Buildings are able to be viewed from the streetscape of surrounding developments, it is considered that due to the high quality architectural design that the proposed roofscapes will provide beneficial views, rather than detrimental view impacts.

Overall it is considered that the proposed height and bulk of the roof additions is acceptable and will not give rise to any adverse impacts.

5.6.2 Overshadowing

Shadow studies are included in the Architectural Design Statement at **Appendix B,** which illustrate the proposed shadows cast by the Buildings post development and the potential impact to the surrounding public domain areas. The shadow studies indicate the following:

- the proposed replacement roof on the Lands Building will not give rise to any significant shadow impacts to the public realm during the summer and winter solstice or during the equinox periods; and
- the proposed Education Building roof structure improves on the level of impact that was generated by the Stage 1 envelope and will not give rise to any additional overshadowing impacts.

5.7 Visual Impacts

A Visual Impact Statement has been prepared by MAKE in support of the proposal and is included at **Appendix B**. The analysis builds on and provides further detail on the Visual and View Impact analysis prepared in support of the approved Stage 1 Consent.

To support the visual analysis, key public domain views, view corridors and public vantage points surrounding the site, consistent with those used for the Stage 1 Consent were identified. Photomontages have been prepared for a total of 16 public domain views and vantage points in the locations shown at **Figure 46**.

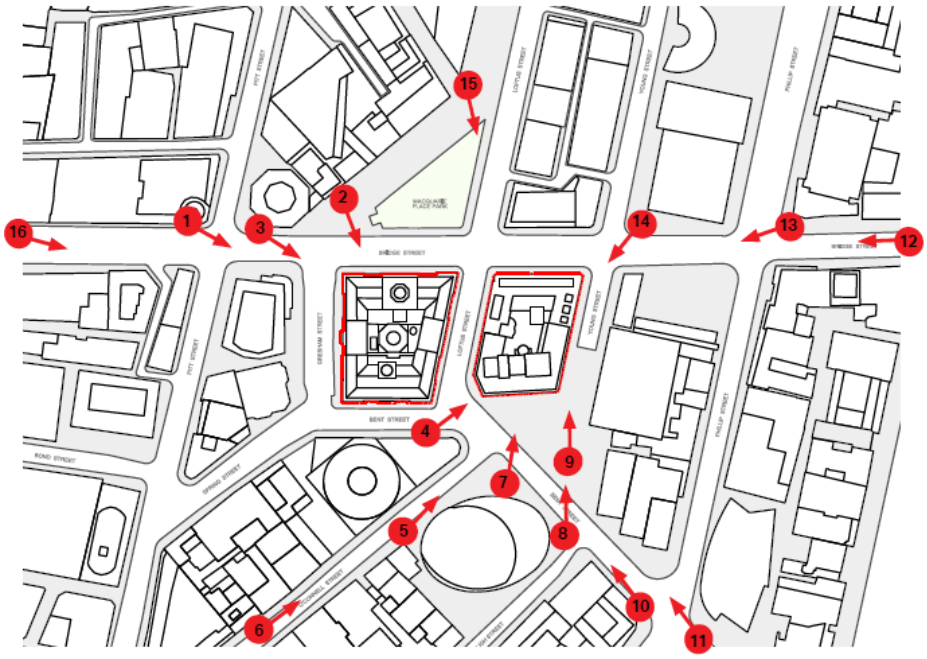

Figure 46 – Visual analysis – photomontage locations
Source: MAKE

The proposal is generally consistent with the approved Stage 1 Consent envelope (aside from a minor height variation to the Education Building). The modifications to the Lands Building roof will be discrete and largely not visible from the public domain. The proposed extension to the Education Building will present massing to the south that is generally consistent with the approved building envelope and visual impacts identified in the Stage 1 DA. Overall:

- existing important views from the public domain at street level to the most significant and highly utilised public domain spaces in close proximity to the site will be retained;
- existing public domain views to key places will be retained or unaffected by the proposal, including views to Sydney Harbour;
- visual connectivity to other buildings and heritage items in the vicinity are generally unaffected by the proposed new built form; and
- the proposed new built form will frame existing public domain views and enclose Farrer Place consistent with the urban locality.

Lands Building

The proposed glazed roof structure is largely not visible from the streetscape in proximity to the building. The assessment confirms the structure is not visible from the Loftus Street, Young Street, O'Connell Street and Macquarie Street viewpoints. The new structure is visible when viewed from certain longer distances along Bridge Street, Bent Street and Philip Street, and is also visible from Farrer Place due to the elevated nature of the landscape. Nonetheless, where visible the proposed new roof adds rather than detracts from the building, tidying up the ad hoc existing roof arrangement.

Education Building

The Education Building extension is set back from the building edge at Bridge Street, ensuring the prominence of the northern façade remains unchanged. The extension is visible from the south however the project designers have sought to break down and articulate the envelope to present a series of distinct volumes with setbacks that soften the structure's relationship with the existing building. Also, the volume of the envelope when viewed from the south is less visually prominent compared to the approved Stage 1 DA envelope.

Before and after photomontages of the proposal in relation to existing and the Stage 1 approval is provided at **Figure 47** – **52** below.

Education Building

Figure 47 – Existing Development

Lands Building

Figure 48 – Existing Development

Figure 49 – Stage 1 Amended Section 96

Figure 50 – Stage 1 Amended Section 96

Figure 51 – This application

Figure 52 – This application

5.8 Heritage

A detailed Statement of Heritage Impact (SHI) (**Appendix F**) has been prepared by GBA Heritage. It addresses all relevant requirements, heritage management objectives and controls set out in the following documents:

- conditions of the Stage 1 consent;
- SEARs;
- Sydney Local Environmental Plan 2012;
- Sydney Development Control Plan 2012; and
- NSW Office of Environment & Heritage, Heritage Division guidelines.

Further, it assesses the proposed works against the principal conservation policies contained within the updated Conservation Management Plans prepared by GBA Heritage, as submitted to the NSW Heritage Council for endorsement but also included at **Appendix F.**

GBA Heritage also confirms that the SHI has been prepared in accordance with the guidelines outlined in the *Australia ICOMOS Charter for Places of Cultural Significance, 2013*, known as the *Burra Charter*, and the NSW Heritage Office (now the Heritage Division of the NSW Office of Environment & Heritage) publication, *NSW Heritage Manual.*

Overall, GBA Heritage considers that the proposed works to the Lands and Education Buildings are carefully considered, of extremely high design quality and of superior materiality. Furthermore, the key conclusions are as follows:

- The aspects of each building that make a defining contribution to the overall significance are being retained, conserved and celebrated.
- The proposed interior design fitout is high quality, restrained and sympathetic to the presentation and significance of the buildings. The quality and design language are contemporary yet classic and will equip the buildings to perform their new role without a major interior refit for the foreseeable future.
- The proposal will enable public access to large areas of the historically secure government buildings. It will integrate with and activate the surrounding locale socially, culturally and economically and also provide opportunities to interpret the cultural significance of the buildings, and their connections to other heritage items in the vicinity, to present and future generations.
- The proposed Stage 2 vertical extension is of an extremely high quality architectural design and features increased setbacks and articulation. The extension presents clearly as a subservient, contemporary projection of the existing building.
- The vertical extension will have an acceptable impact on the Education Building and will not adversely affect the contribution that the building makes to the surrounding locale.
- The existing Lands Building ancillary roofs are aesthetically disappointing. The proposed replacement roof structures have been designed to allow Level 3 and above to be accessible and habitable and protect the primacy of the major roof features and to be unobtrusive when viewed from the public domain.
- The new Lands Building roofs are of an extremely high quality architectural design and will have a positive impact on the Lands Building.
- It is recognised that there will be some adverse heritage impacts on fabric within the Lands and Education Buildings, however, these are outweighed by:

- the opportunities to adapt the buildings by adding a contemporary layer of high quality architecture and design, thereby ensuring they are well suited to effectively and usefully operating in the future;
- the opportunities for on-going conservation of historic fabric;
- the opportunities to provide employment to specialist conservation trades;
- the opportunities to remove later obtrusive interventions;
- the opportunities to analyse the construction of the Lands and Education Buildings;
- the opportunities to better interpret the significance of the buildings to the public;
- the opportunities to socially, culturally and economically activate the Sandstone Precinct;
- the benefit to the City in terms of the provision of a hotel and ancillary facilities that will be available to tourists and local citizens;
- the opportunities for public access to historic, former government buildings that have historically been secure facilities;
- the opportunities to carry out seismic upgrade works to the buildings and to upgrade them generally to address the BCA;
- the opportunities for equitable and dignified access into and throughout the buildings; and
- the opportunities for access to the areas within the Buildings that have never had appropriate access.

Furthermore, GBA Heritage consider that the adaptive re-use interventions will equip the Buildings to appropriately function in their new role as a luxury world-class hotel, while protecting and celebrating their heritage significance.

Notwithstanding the above, GBA Heritage make the following recommendations:

- Once the buildings are vacated, and non-significant linings have been removed, a Conservation Schedule of Works for both buildings should be prepared to guide the appropriate conservation of historic exterior and interior fabric.
- Once conservation works have been successfully completed, a long-term maintenance plan should be prepared to guide the long-term care of the building.
- A photographic archival recording, carried out in accordance with the NSW Heritage Office publication: *Photographic Recordings of Heritage Items Using Film or Digital Capture*, of both buildings should be carried out before any work commences.
- Consideration should be given to salvaging and storing strategic examples of historic fabric that is proposed to be demolished.
- Any potential adverse material impacts should be addressed in the final Construction Management Plan to ensure that potential damage to the buildings is avoided during construction.
- The *Lands Building Moveable Heritage Management Strategy*, prepared by Musecape, dated August 2013 should be reviewed and updated by an experienced moveable heritage curator into a Moveable Heritage Management Plan that should provide detailed recommendations on the future conservation, management, display conditions, security and location of each identified moveable heritage item that remains in the building.
- The *Moveable Heritage Review of the Former Department of Education Building, 35 Bridge Street, Sydney*, prepared by Musecape, dated June 2016 should be reviewed and updated by an experienced moveable heritage curator into a Moveable Heritage Management Plan that should provide detailed recommendations on the future conservation, management, display conditions, security and location of each identified moveable heritage item that remains in the building.

- Should any unexpected relics be disturbed during excavation of the site, they must be managed under the Archaeological provisions of the *NSW Heritage Act.*
- A heritage consultant experienced in heritage conservation works should work with the consultant team throughout the continuing design development, contract documentation and construction stages of the project. The heritage consultant should be involved in the resolution of all matters where existing significant fabric and spaces are to be subject to preservation, restoration, reconstruction, adaptive reuse, recording and demolition. The heritage consultant should be provided with full access to the site.

5.9 Archaeological Assessment

An Aboriginal and Historical Archaeological Assessment (AHAA) has been prepared by Curio Projects (**Appendix Q**). The assessment establishes a framework for investigation and management of Aboriginal and historical archaeological heritage values of the site prior to, during and following construction of the proposal. The assessment has been prepared in accordance with all relevant NSW Heritage Division, OEH and DPE guidelines and policies.

5.9.1 Aboriginal Archaeology

The AHAA identifies the site's potential to possess Aboriginal heritage sites, places or objects and/or values in accordance with the Office of Environment and Heritage (OEH) guidelines for due diligence.

A search of the Aboriginal Heritage Information Management System (AHIMS) database was undertaken on 22 January 2016 which found there were no recorded Aboriginal heritage sites within the site and 25 recorded Aboriginal sites within 2km. The most common type registered in the area is potential archaeological deposit sites, followed by artefact and shell midden.

The site is located on land that would have been a focus for Aboriginal occupation prior to the establishment of European settlement. The site would have continued to be a point of interaction between early settlers and Aboriginal peoples. Curio observe that due to the extent of development it is unlikely that natural soil profiles have remained intact within the site and predictive modelling suggests that there is low likelihood of intact, insitu Aboriginal archaeological deposits to remain. However, if present, any remaining deposits would be considered of high cultural and social significance to the Aboriginal people.

To mitigate impacts arising from the proposal on Aboriginal remains that may be encountered on site, Curio have developed an *Aboriginal Cultural Heritage Methodology and Methodology for Unexpected Aboriginal Archaeology* for subsequent management and excavation methodologies to be referred to for the proposal (refer to **Appendix Q**). The report has been prepared in consultation with registered Aboriginal parties and includes the need to stop work and notify OEH of the discovery of unexpected Aboriginal place or objects, if encountered.

Further, the following recommendations are proposed by Curio:

- While the discovery of an Aboriginal archaeological deposit is not expected within the subject site, in the unlikely event that natural soil profiles with the potential to retain Aboriginal archaeological deposits are encountered during site works, the document entitled 'Aboriginal Cultural Heritage Methodology and Methodology for Unexpected Aboriginal Archaeology' should be referred to for subsequent management and excavation methodologies.

- In order to maintain best practice methodologies for any subsequent Aboriginal cultural heritage investigation and assessment within the study area, the following guidelines should continue to be adhered to:
  - *Aboriginal cultural heritage consultation requirements for proponents 2010. Part 6 National Parks and Wildlife Act 1974* (April 2010);
  - *Code of Practice for the Archaeological Investigation of Aboriginal Objects in New South Wales* (September 2010); and
  - *Guide to Investigating, Assessing, and Reporting on Aboriginal cultural heritage in NSW* (April 2011).

5.9.2 Historical Archaeology

The AHAA evaluates the site's potential to contain historical archaeological objects and the potential impact of the proposal on these.

As there have been no archaeological excavations undertaken at the site, the Assessment has analysed the archaeological potential of the site including a comparison of the outcomes of previous archaeological investigations within the general vicinity of the site and a review of the previous archaeological assessment undertaken in support of the Stage 1 application.

The assessment found that archaeological assessments undertaken at other development sites within the CBD suggest it is unlikely that archaeological resources from early settlement would remain on site due to subsequent redevelopments of the site over the years. Curio note that the predictive modelling suggests that as the natural sandstone topography is quite close to the ground level in key CBD areas, it is unlikely substantial archaeological profiles have survived.

Nevertheless, an assessment of historical archaeological potential suggests the site has the potential to contain State significant archaeological relics associated with all phases of development at the site. Curio notes that it is likely that any relics found would have been subject to various levels of disturbance as a result of historic development patterns. In summary, potential archaeological evidence may include:

- evidence of pre-settlement planting and farming on site;
- evidence relating to the establishment of the colony including buildings, fence lines and gardens that are thought to be located in the area;
- evidence such as wells, cesspits, rubbish dumps and early infrastructure that may have survived the cutting down of modern construction;
- the Bennelong Stormwater Channel no. 29 which runs below Loftus Street, and along Gresham and Young Street;
- evidence of the Lands building moat (which is insitu) and its construction;
- evidence of the former original carriageway and carriage loop within the Lands building, including paving and associated features; and
- evidence of building footings, drainage features and other underground services.

There is moderate and high potential for the above resources to exist the site. **Figure 53** and **54** present the general archaeological potential across the site along with the likely location of historical structures that may remain within the site.

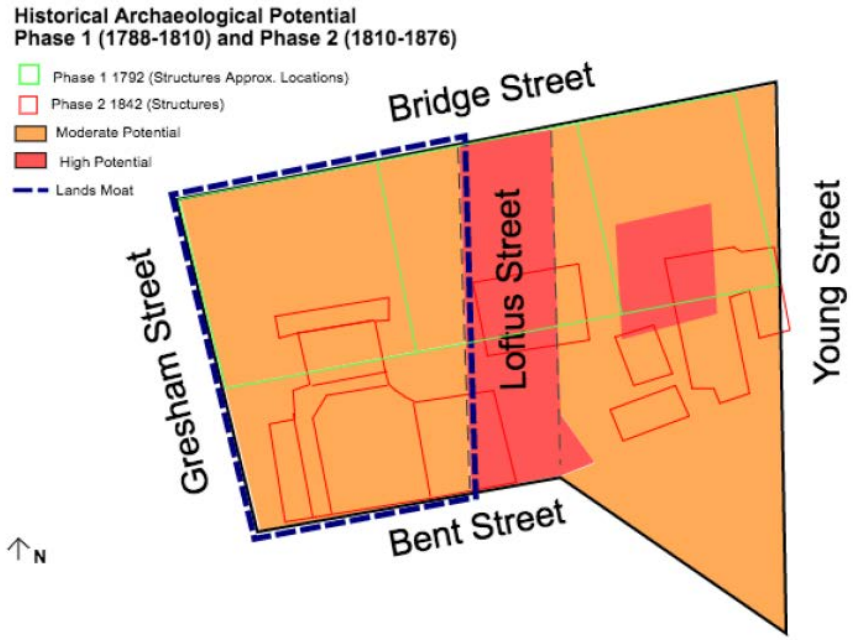

Figure 53 – Historical archaeological potential and indicative base structures 1788-1876
Source: Curio

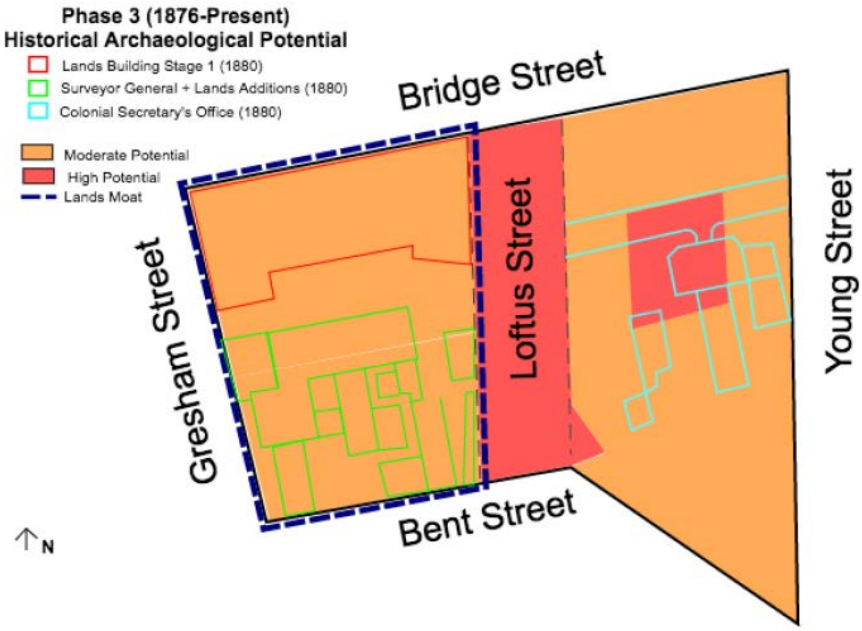

Figure 54 – Historical archaeological potential and indicative base structures 1876 - present
Source: Curio

The AHAA identifies that the principal impact of the proposal on potential archaeological resources would be from the excavation of the basement beneath the Education Building and the subterranean works between the Education and Lands Buildings. In order to mitigate impacts on potential archaeological remains the following measures are recommended:

- prior to commencement of excavation on site, an Archaeological Research Design and Excavation Methodology will be required to be prepared and submitted to the NSW Heritage Division and DPE for approval;
- an Archaeological Interpretation Strategy that provides detailed interpretative options for significant archaeological resources, once found, will be required to be prepared prior to the issuance of the occupation certificate. (An overarching Heritage Interpretation Strategy, which includes provisions for archaeology, has been prepared for the Sandstone Precinct by GBA. Following archaeological investigation, an Interpretation Strategy specific to the archaeological resource (if found) for the site would be prepared);
- due to the potential significance of the site, the archaeological investigation in areas proposed to be excavated, should be managed by an Excavation Director that meets the State Significant Excavation Director Criteria issued by the NSW Heritage Division;
- should unexpected, potential historical archaeological 'relics', skeletal remains or Aboriginal objects be discovered during the works program, then works must cease in the immediate area and the project archaeologist contacted for advice;
- depending on the nature, extent and significance of the find, further consultation with the NSW Heritage Division and/or OEH and archaeological investigation may be required, prior to works recommencing on site.;
- the Bennelong Stormwater Channel no. 29 runs below Loftus Street, and along Gresham and Young Street. The channel is of State significance and will need to be protected during construction; and
- the Lands Building is surrounded by a subterranean moat that is located around the exterior of the building. The moat forms part of the state significant fabric of the building and will need to be protected during construction.

5.10 Traffic, Parking and Access

A Traffic Impact Assessment report has been prepared by ARUP to determine the potential impacts of the proposal on the existing transport network (see **Appendix O**). The key components of the Traffic Impact Assessment are outlined below.

It is noted that a new indented drop off facility is expected to be introduced to Farrer Place as the primary vehicle drop off/pick up point for the hotel. This will be the subject of a separate development application and is not part of the scope of this EIS (refer to **Section 1.2.2**).

5.10.1 Operation

Car Parking

Due to the heritage constraints of the site the proposal will not provide on-site parking. The car parking provisions of Sydney LEP 2012 set a maximum number of car parking spaces that may be provided for the development, with no minimum requirement. Accordingly, the proposal complies with the requirements of the LEP.

It is expected that hotel guests will typically utilise taxi or public transport options when arriving at the hotel. The car mode proportion is expected to be approximately 10 percent of guests, which equates to 25 cars requiring overnight parking.

As is typical for hotel operators in the CBD, car parking needs can be met through shared parking arrangements with commercial buildings or CBD car park operators. The assessment has identified 12 car parks near the site that would be able to accommodate requirements for off-site car parking for hotel guests as shown at Figure 14 of the Traffic Impact Assessment (**Appendix O**).

Motorcycle Parking

Due to the heritage constraints of the site the proposal will not provide on-site parking, this includes parking for motorcycles. Off-site parking for motorcycles would be managed in accordance with parking for vehicles as outlined above.

Bus/Coach Parking

There are multiple set down and pick up areas proximate to the site, along Bent Street, Gresham Street and Loftus Street. On-street designation is described at Section 4.1 of the Traffic Impact Assessment at **Appendix O**.

Bicycle Parking

A dedicated cycle store room is proposed on the lower ground floor of the Education Building. The store room will have capacity for 60 bicycles. Staff self-park their bicycles, while guest bicycles will be valet parked.

An assessment of the proposal's compliance with the Sydney DCP 2012 is provided at **Table 13**. Where possible, the design has sought to meet DCP requirements for bicycle parking, however due to the heritage constraints of the buildings, this has not been possible. The hotel will provide staff with access to change and shower facilities, the details of which will be finalised during detailed design. Guests would not require access to end of trip facilities as these are provided within hotel suites and the spa/ fitness facilities.

Condition B14 of the Stage 1 DA consent requires the Stage 2 DA to provide bicycle access and servicing in accordance with the Sydney DCP 2012. In light of the non-compliances discussed above, a modification to Condition B14 is being sought in the section 96 application to be submitted concurrently with this application.

Table 13 – Bicycle parking assessment

Hotel Component	Number	DCP Bicycle Parking Rate	Proposal
Staff (at any one time)	150	1 space per staff	45
Hotel rooms	253	1 space per 20 rooms	13
Total			58

Servicing

A loading bay will be provided within the Education Building that is accessed from Loftus Street via the existing vehicle entry point. The existing opening within the heritage sandstone façade is limited to a width of 3.0m and height of 3.0m which limits delivery vehicles able to access the loading bay.

The loading bay accommodates one small ridged vehicle and two vans at the same time. Deliveries for the Lands Building would also utilise the loading bay with goods to be transferred via elevators and the subterranean link.

An outline loading dock management strategy has been prepared by ARUP at Section 3.6.1 of **Appendix O**. The outline strategy establishes principles for the management of vehicle movements including:

- engagement of a loading dock supervisor;
- management of deliveries and waste collection via a booking system; and

- further consultation with Council and waste contractors to determine estimate truck movements.

A Loading Dock Management Plan will be prepared prior to occupation of the building to ensure adequate management of deliveries and waste collection. Operational requirements for waste collection is discussed at Section 5.14.

5.10.2 Traffic Impact Assessment

Trip Generation

As discussed in Section 5.10.1 the proposal will not provide any on-site parking, while hotel guests may generate demand for 25 vehicles to be parked overnight in the vicinity of the site. The assessment has considered the worst case scenario which assumes that 100 percent of vehicles depart the site during the AM peak (8am – 9am) and arrive during the PM peak (5pm – 6pm). It is more likely vehicle arrival and departures would be dispersed across the day, reducing the impact on the road network.

A large number of taxis currently operate throughout the CBD. Accordingly, the arrival and departure of guests is not expected to increase traffic levels in the precinct.

Assessment

The traffic modelling results are presented at Table 2 of the Traffic Impact Assessment (**Appendix O**). The results show that while there is a negligible increase to the degree of saturation, all intersections will continue to operate with the same level of service following completion of the proposal compared to the existing scenario.

Accordingly, no mitigation measures are proposed.

5.10.3 Travel Plan

In order to reduce traffic demands and to encourage use of sustainable forms of transport to the site a Travel Plan would be prepared by the hotel operator. The travel plan would be applicable to both staff and hotel guests with the following key objectives:

- reduce the need to travel;
- improve non-car travel methods; and
- ensure the most efficient use of car parking spaces.

Framework objectives and measures for the preparation of a travel plan for the future hotel include:

- easily accessible transport information for hotel guests prior to their arrival and during their stay;
- increase of travel choices for employees, with an emphasis on improving access by sustainable modes of transport;
- encouragement of high mode share to sustainable modes from private vehicle usage; and
- raising awareness of sustainable transport amongst staff and guests with travel guides.

5.11 Accessibility

An Access Report prepared by Morris Goding Accessibility Consulting (MGAC) is included at **Appendix S**, which provides advice and strategies to maximise reasonable provisions of access for people with disability in response to the relevant provisions within the AS 1428 series, Building Code of Australia (BCA), DDA Access to Premises Standards (including DDA Access Code) and the Commonwealth Disability Discrimination Act (DDA).

The Access Report confirms that in general and in consideration of the heritage significance of the Buildings and their environmental constraints that:

- the proposed development will improve access provisions for people with a disability and can achieve continuous accessible paths of travel; and
- the Architectural drawings indicate compliance with the statutory requirements, pertaining to site access, building entry, common area access, accessible accommodation and accessible sanitary facilities can be achieved by adopting an access strategy that combines prescriptive and performance based solutions.

MGAC also provide a list of recommendations which are required to be taken into consideration in the ongoing design development and confirmed prior to Construction Certificate stage.

5.12 Noise and Vibration

An assessment of Noise and Vibration has been prepared by Wood and Grieve Engineers (**Appendix T**) that assesses the potential noise impacts associated with the proposed development. The noise assessment identifies environmental noise sources which may impact on the site and recommends acoustic treatments to reduce these impacts to acceptable levels.

The closest sensitive receivers are residential apartments located at 38 Bridge Street, north of the Education Building. Commercial receivers are located east of Young Street, south of Bent Street and west of Gresham Street.

Unattended noise measurements were conducted between 10 June 2016 and 24 June 2016 with four unattended loggers positioned on site to determine the level of ambient noise at the site. Attended noise measurements of 15-minute duration were also conducted on site to characterise the acoustic environment for noise intrusion into the development and to determine any noise impact on surrounding sensitive receivers (refer to **Figure 55)**.

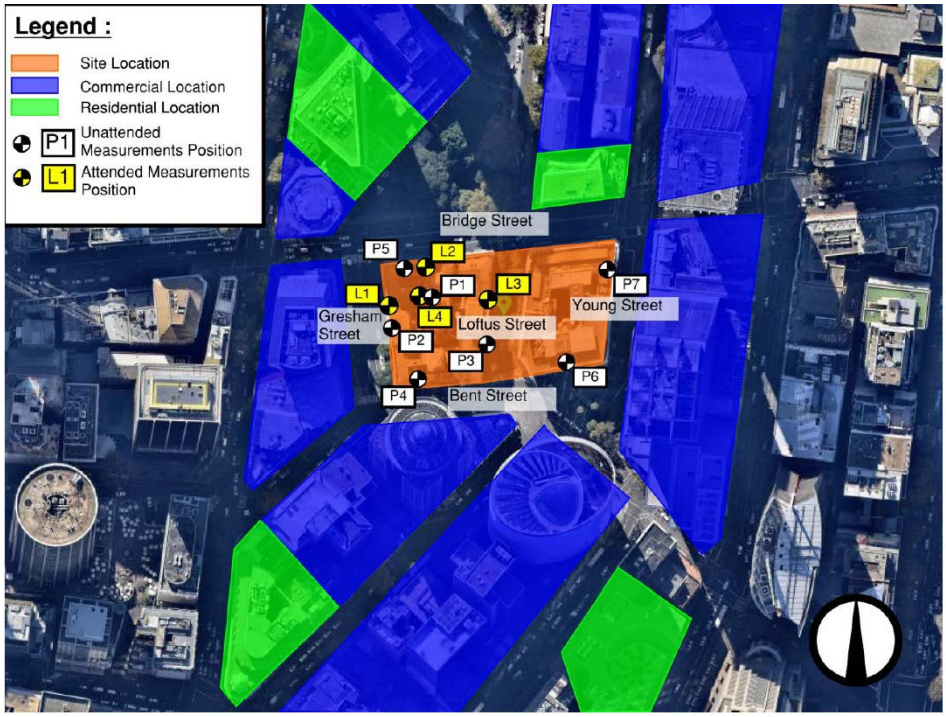

Figure 55 – Surrounding receivers and noise measurement locations
Source: Wood and Grieve

5.12.1 Construction Noise and Vibration

The construction program has yet to be fully established as the proposal is still at the planning phase of development. A detailed assessment of noise and vibration impacts resulting from the proposal cannot be predicted; however, Wood and Grieve has established detailed noise and vibration criteria for construction of the proposal in line with general requirements and State policy guidelines.

Construction Noise

The relevant construction noise criteria have been established in accordance with the NSW EPA Interim Construction Noise Guideline and are provided at Section 5.1 of the Noise and Vibration assessment at **Appendix T**. At this early stage of the development, details of the construction program are yet to be finalised. Accordingly, further detailed testing is to be undertaken in relation to construction noise impact modelling. A Construction Noise and Vibration Management Plan will be developed to manage construction noise.

Construction Vibration

The relevant construction vibration criteria have been established by Wood and Grieve and are provided at Section 5.2 of the Noise and Vibration assessment. At this early stage of the development, details on the construction program have yet to be finalised. Accordingly, further detailed testing is to be undertaken in relation to construction vibration impact modelling. A Construction Noise and Vibration Management Plan will also be developed to manage construction vibration.

5.12.2 Operational Noise

Hotel Glazing

Appropriate noise levels for the hotel have been drawn from the City of Sydney DCP and the City of Sydney Standard Condition of Development Consent 2012 – Internal Noise Level Criteria.

Based on these standards, internal noise objectives for the hotel development have been established, as provided at **Table 14**. In order to achieve the recommended internal noise criterion Wood and Grieve have provided detailed recommended minimum glazing requirements at Table 18 of the Noise and Vibration assessment.

Table 14 – Project specific internal noise criteria

Type	Descriptor	Closed Window PSNL dB(A)	Open Window PSNL dB(A)
Sleeping area	$L_{Aeq,\ 15min}$	35 (10pm-7am)	45 (10pm-7am)
Living Area	$L_{Aeq,\ 15min}$	45 (24 hours)	55 (24 hours)

Acoustic Intrusion

The NSW Environment Protection Authority (EPA) sets out noise criteria in its Industrial Noise Policy (INP) to control the noise emission from industrial noise sources or continuous steady state noise. Based on the results of the ambient and background noise monitoring the intrusiveness criteria for the closest residential receivers are provided at **Table 15**.

Table 15 – EPA INP Intrusiveness Criteria

Period	Noise Descriptor – dB(A)	Noise Criteria – All residential receivers
Daytime 7am – 6pm	LAeq,15min ≤ L90,15min + 5	66.5
Evening 6pm-10pm	LAeq,15min ≤ L90,15min + 5	65.5
Night 10pm – 7am	LAeq,15min ≤ L90,15min + 5	58.9

Acoustic Amenity

To limit continuing increases in noise levels, the maximum ambient noise level within an area from industrial noise sources should not normally exceed the relevant acceptable noise levels specified in the INP. The relevant amenity criteria for external noise levels is provided at **Table 16**.

Table 16 – Amenity criteria for external noise levels

Period	Noise Descriptor – dB(A)	Noise Criteria – All residential receivers
Daytime 7am – 6pm	LAeq,15min ≤ L90,15min + 5	66.5
Evening 6pm-10pm	LAeq,15min ≤ L90,15min + 5	65.5
Night 10pm – 7am	LAeq,15min ≤ L90,15min + 5	58.9

Noise emission criteria from mechanical plant and other noise sources from the hotel was also established according to the EPA Industrial Noise Policy. The assessment also identifies noise criteria set by the NSW Road Noise Policy and NSW Liquor Administration Board.

Noise Emissions

The mechanical plant responsible for noise emissions during operation include:

- Level 8 cooling towers - Education Building;
- Level 9 to rooftop mechanical exhausts such as garbage exhaust fan, kitchen exhaust and bathroom exhaust - Education Building; and
- Level 3 (rooftop) plant room – Lands Building.

To assesses the impact of mechanical plant the worst case scenario has assumed that air conditioning units, exhausts and supply fans run at any time throughout a 24hr period. The night time is the most stringent period for noise generated by the operation of mechanical plant and as such this criterion has been used as the noise target at the boundary of the nearest sensitive receivers for the project. Wood and Grieve conclude the combined sound power level of all plant equipment can be a maximum 98 dB(A) when measured at the façade of the closest sensitive receiver.

At this early stage specific mechanical plant has yet to be selected. However, Wood and Grieve have undertaken assessment of typical mechanical plant units as summarised at **Table 17**.

Table 17 – Indicative noise emission of individual mechanical units

Item	Overall dB(A)
Toilet Exhaust Fans	39
Kitchen Exhaust Fans	110
Cooling Towers	89
Stairs Pressurised Fans	107

The assessment confirms that with the inclusion of standard acoustic treatment such as acoustic attenuators, acoustic louvres and internal lining of duct work project specific noise levels at the boundary of surrounding receivers can be met.

Further assessment of noise will be undertaken during detailed design of the proposal.

Road Traffic Noise

As the proposal does not include provision for on-site parking the operational traffic noise impact of the proposal is not relevant. Wood and Grieve conclude that the proposal is expected to comply with the requirements of the NSW Road Noise Policy.

Retail and Commercial Noise

Each of the retail / commercial tenancies will be subject to separate future approvals for their fitout, and a noise assessment will be required to be submitted with the future separate application(s). Each retailer will be subject to City of Sydney noise guidelines and NSW Liquor Act noise criteria.

Wood and Grieve have undertaken an indicative assessment of the designated Bar, a Licensed Restaurant with Dining Area, and a Bistro Dining space within the Lands Building. With an assumed maximum capacity of 200 persons the assessment concludes the proposal would meet the licenced premises noise criteria for octave band frequencies.

5.13 Water Cycle

A Stormwater Management Plan and Assessment has been prepared by Wood and Grieve (**Appendix U**). Key aspects of the assessment are described below.

5.13.1 Stormwater

The proposed stormwater system has been informed by the requirements of the Sydney DCP 2012. The drainage system would reticulate via a new connection for each building to the existing stormwater infrastructure adjacent to each building as shown in the Civil Design Plan prepared by Wood and Grieve at **Appendix U**.

The Lands Building would connect to an existing Sydney Water stormwater kerb inlet pit on the corner of Bridge Street and Gresham Street. The connection will be a 375mm diameter RC pipe connection.

The Education Building would require the construction of a new stormwater kerb inlet pit on Loftus Street that breaks into the existing Sydney Water stormwater line running under the kerb and gutter. This connection will also be a 375mm diameter RC pipe connection.

Stormwater drainage would pass through water quality treatment devices prior to discharge to Council infrastructure. To achieve Council targets for stormwater quality it is proposed to install Stormwater 360 Storm filter systems.

Council's mapping indicates that no on-site detention will be required.

5.13.2 Flooding

Wood and Grieve confirm the site is not affected by the 100-year design flood event. Accordingly, there is no flood planning level requirement for the commercial floors (retail and accommodation) of the proposal.

The probable maximum flood (PMF) extent would impact on parts of Bent Street, Loftus Street, Gresham Street and Bridge Street. Flood modelling indicates that during a PMF flood event the flood depths would range between 0.1 to 0.25m on all street frontages. In accordance with Council's draft flood management guidelines the crest of the Loftus Street loading dock is to be set 0.25m above the adjacent gutter level to mitigate risks of PMF flood waters entering the loading dock.

The key elements of the proposal in relation to the flood planning levels outlined in Council's Interim Floodplain Management Policy 2014 are provided at **Appendix U**.

5.14 Wind Impacts

An Environmental Wind Tunnel Test Report has been prepared by CPP Wind Engineering and Air Quality Consultants (**Appendix V**), which assesses the impact of the proposed development on the local wind environment. The report assesses the proposal against the relevant criteria in the Sydney Development Control Plan 2012, namely that wind effects should not exceed 10 m/s along Farrer Place and Spring Street and 16 m/s in all other neighbouring streets. The report concludes that wind conditions around the site as a result of the proposed development are expected to remain similar to existing conditions. While the ground level pedestrian environment surrounding the site would not meet the DCP criteria (either the existing or proposed situations), all locations meet the relevant distress criterion and pedestrian walking comfort criterion with improved wind conditions along Farrer Place. Locations on the roof level of both buildings will be suitable for pedestrian sitting activities.

5.15 Reflectivity

A Solar Reflectivity Assessment has been prepared by CPP Wind Engineering and Air Quality Consultants (**Appendix W**), which analyses the potential for solar reflectivity glare impacts of the proposed development on surrounding public roadways. The report assesses the proposal against the relevant criterion in the Sydney Development Control Plan 2012, which requires that light reflectivity from building materials used on facades must not exceed 20%. Separate analyses are carried out for the Education Building and Lands Building.

5.15.1 Education Building

The Solar Reflectivity Assessment found that the additional three storeys proposed above the Education Building would generally produce reflectivity levels below the maximum required 20%. At certain locations and times of the year/day when the sun's altitude is low, reflectivity would be higher than 20%, however solar rays would be blocked by existing surrounding buildings meaning that solar rays are not expected to reach the site at those times. Therefore, the report concludes that the three additional

levels proposed above the building are not expected to produce significant disability glare onto motor vehicles travelling toward the site along the adjacent roadways.

5.15.2 Lands Building

The Solar Reflectivity Assessment states that the proposed rooftop glazing for the Lands Building has the potential to produce diffuse reflections that may cause discomfort for drivers. Accordingly, the report recommends that an exterior reflectance coefficient of less than 20% is adopted for this material. The report also recommends that non-glazed building elements (such as metallic framing and supports) adopt low lustre, matte finished surfaces. These recommendations could be incorporated into appropriate conditions of development consent.

5.16 Building Code of Australia

McKenzie Group have prepared a BCA Report for the proposal (**Appendix X**) which has assessed the proposal's compliance with the Building Code of Australia 2016.

McKenzie Group concludes that whilst some elements of the proposal will comply, it is not possible to achieve full compliance as this would have an adverse impact on the heritage significance of the buildings.

Given the buildings are of State heritage significance it falls within the discretion of a consent authority under Clause 94 of the *Environmental Planning and Assessment Regulation 2000* (EPAR) to allow partial or total compliance in upgrading to current standards. It is considered acceptable to compromise on compliance with certain aspects of the BCA in order to preserve the significance of the State heritage items.

The strategy for compliance includes:

- In accordance with Clause 145 of the EPAR, where possible all new works will comply with the BCA.
- In accordance with Clause 143(1) of the EPAR, a combination of prescriptive design compliance and performance based solutions are proposed to demonstrate that the design is capable of achieving compliance with provisions of the BCA.
- In accordance with Clause 94 of the EPAR, where necessary, existing features will have a reduced requirement to comply with the BCA.

Wood and Grieve have prepared a Section J Report (**Appendix Y**) which assesses the proposal against the relevant provisions of Section J (Energy Efficiency) of the BCA. The requirements are designed to reduce the use of artificial heating and cooling, improve the energy performance of lighting, conditioning and ventilation, and reduce energy loss through air leakage. The Report confirms that if minimum glazing thermal properties for the Lands and Education Building are met, the estimated energy consumption for the proposal is in accordance with Section J of the BCA.

5.16.1 Fire Engineering

CORE Engineering Group has provided a fire safety strategy report (**Appendix Z**) which outlines the fire engineering principles and construction and management requirements to achieve an acceptable level of life safety within the buildings, to ensure that the prescriptive Deemed-to-Satisfy (DtS) non-compliances are capable of being addressed with an alternate solution.

As outlined in Section 5.13, in accordance with Clause 143(1) of the EPAR a combination of prescriptive and performance based solutions will form a single fire safety strategy to ensure that fire protection for the new use is appropriate. A Fire Engineering Report will accompany the Construction Certificate documentation that will demonstrate this.

5.17 Geotechnical

The geotechnical conditions of the site are summarised at Section 2.3.6 of this EIS, and outlined in the Geotechnical Desktop Study undertaken by Pells Sullivan Meynink (PSM) (**Appendix G**).

The Study found that the site is not typical of those found in the CBD from a geotechnical perspective due to a range of unfavourable and variable conditions underlying the site, including:

- water inflow;
- instability of overburden;
- unstable rock wedges within excavation faces; and
- ground movement due to adjacent roads, buildings and tunnels.

The PSM Study recommends that further detailed site investigation be undertaken including:

- Site drilling to confirm the presence of the Pittman LIV Dyke;
- Site drilling to confirm the extent and nature of of the G.F.O. Fault Zone; and
- Site drilling at the peremiter of proposed excavation to provide input for shoring design, depth of rock, nature of soil to be retained and rock conditions at foundation level.

Further testing can be undertaken, prior to the commencement of construction and can be made a condition of consent.

5.18 Operational Waste Management

The Mack Group has prepared a Waste Management Plan (WMP) to ensure waste generated by the proposal is appropriately managed (refer to **Appendix L**). Based on Council's waste generation guidelines, the WMP identifies the potential types and volumes of waste expected to be generated in the operation of the proposed development and suggests systems and design recommendations to appropriately manage waste.

Mack Group has estimated the general and recyclable waste that would be generated by each component of the Lands and Education Buildings. Based on these calculations the waste storage requirements can be inferred. **Table 18** summarises the proposed waste generation amounts and the waste storage requirements based on a 3 x weekly collection.

Table 18 – Waste generation and storage requirements

	Bin Quantity and Volume	Total Waste Generation (L/week)	Collection
Education Building			
General Waste	4 x 1,100L	13,379L	3 x week
Recyclable Waste	4 x 1,100L	13,379L	3 x week
Lands Building			
General Waste	2 x 1,100L	5,155L	3 x week
Recyclable Waste	2 x 1,100L	5,155L	3 x week

A cleaning contractor will be responsible for collecting and transferring waste to the main waste storage area of each building respectively.

The main waste store room for the Education Building will be located on the Lower Ground Level, close to the loading dock and on street level. Due to the heritage nature of the building, the low ceiling will require the private waste collector to park on Loftus Street and collect bins from the store room.

The main waste store room for the Lands Building is on the Lower Ground Floor which is on street level. Due to the heritage constraints of the building a loading dock cannot be provided. The private waste contractor will be required to park on Gresham Street and collect bins from the waste store room.

The Lands Building contains a retail component that would have dedicated retail waste bins and storage space within the main waste store room. The retail operator will be responsible for management and collection of waste by their own private waste contractor.

5.19 Air Quality

A Preliminary Air Quality Management Plan has been prepared by CETEC (**Appendix AA**) to provide recommendations to manage air quality during demolition and construction of the proposal.

The dominant impacts expected because of the construction program include:

- demolition and construction dust;
- hazardous dusts and fibres;
- exhaust emissions from machinery and vehicles; and
- ozone depleting gas emissions.

The CBD location will result in construction of the proposal being near a high number of people and private and public buildings. Further, Sydney Harbour and the Royal Botanic Gardens are located approximately 250m to the north and east respectively.

CETEC outline a range of measures to be implemented to mitigate impacts to air quality because of the proposal including, but not limited to:

- develop and implement a detailed Construction Air Quality Management Plan specific to the site and the proposed demolition and construction work in consultation with relevant stakeholders;
- carry out regular inspections and audits to ensure compliance with the Construction Air Quality Management Plan;
- identify activities that are likely to generate dust and implement appropriate dust control measures for dust generating activities to minimise dust emissions from the site boundaries; and
- delineate dust generating activities to specific areas where possible.

These mitigation measures can be included as part of the Construction Management Plan to be prepared and submitted prior to the issue of a Construction Certificate.

5.20 Impact on the Interim Rail Corridor

An assessment of the proposal in relation to the Metro rail alignment that runs directly beneath the Lands and Education Buildings is included within the Structural Assessment Report prepared by Taylor Thompson Whitting (TTW). As shown in **Figure 56** the eastern tunnel runs beneath the south-west corner of the Education building and north-east corner of the Lands Building. The western tunnel lies directly beneath the south-west corner of the Lands Building.

TTW have held discussions with Metro who confirm that there is a separation of 7m between the lowest level of excavation required for the Education building and subterranean link (RL -0.23) and the Metro tunnels below. Early discussions indicate that the clearance should be acceptable, however ongoing consultation will be carried out once the construction methodology is finalised.

Figure 56 – Sydney Metro tunnel alignment
Source: Taylor Thompson Whitting

Figure 57 – Sydney Metro Tunnel Cross Section
Source: Taylor Thompson Whitting

5.21 Utilities and Services

Wood and Grieve Engineers confirm in their Engineering Infrastructure Report (**Appendix H**) and as outlined in Section 3.16 that the utilities and services can be provided to adequately service the proposed development.

5.22 Crime Prevention through Environmental Design

A Crime Prevention through Environmental Design (CPTED) assessment has been undertaken by JBA (**Appendix CC**). This report assesses the elements of crime, and the fear of crime that may be associated with the adaptive reuse and conversion of the Lands and Education Buildings to a luxury hotel which includes ancillary retail, restaurant and food and drink uses.

The following tasks were undertaken in the preparation of this assessment:

- review of key literature on CPTED by the Department of Attorney General and Justice Crime Prevention:
- collection and analysis of local and NSW State crime statistics from the Bureau of Crime Statistics and Research (BOSCAR); and
- a crime risk assessment in accordance with the current NSW policy and practice, of the following regulation and assessment principles:
    1. Surveillance
    2. Lighting/ technical supervision
    3. Territorial reinforcement
    4. Environmental maintenance
    5. Activity and space management
    6. Access control
    7. Design, definition and delegation

In consideration of the proposed operational management and security measures as set out within the Plan of Management and the assessment of the physical environment, the assessment finds the proposal suitable with regard to crime prevention and public safety, subject to recommendations. These recommendations relate to specific detailed design components to mitigate the potential impacts of crime and ensure patrons of the hotel and ancillary uses are accommodated in a safe and positive environment.

Mitigation Measures

- Provide way finding signage within the Buildings to reinforce visitors and employees/ patron's perception of safety and legibility.
- Provide secure electronic access (card/ key controlled entries and lifts) to prevent unauthorised access.
- Where CCTV will be provided, coverage should be provided in conjunction with suitable lighting to ensure clear CCTV footage can be captured.
- Ensure mechanisms are in place for on-going maintenance of the Buildings, include:
    - Rapid removal policy for vandalism repair and the removal of graffiti;
    - Maintenance of the surrounding public spaces; and
    - Litter removal and the provision of rubbish bins.
- Use high quality materials for construction to lessen the likelihood of damage and help reduce maintenance costs.

5.23 Construction Management

A Construction Management Plan (CMP) has been prepared by Built Pty Ltd (**Appendix M**) which details the site construction and environmental management principles for the proposed development, including construction traffic and waste management. The CMP anticipates construction duration of 2.5 to 3 years from site commencement.

The CMP addresses the following:

- Demolition and excavation management;
- Public amenity, safety and pedestrian management;
- Materials handling;
- Construction traffic management including public transport interface;
- Noise and vibration management;
- Heritage conservation and protection;
- Workplace health and safety;
- Environmental management;
- Construction waste management and recycling;
- Dust management;
- Acid sulfate soils management; and
- Stormwater and sediment control.

Also, a Construction Traffic Management Plan prepared by Sbmg Pty Ltd is attached to the CMP. It outlines measures to manage construction vehicles including vehicle approach and departure routes, road closures and detour signage as well as construction hours. The report also sets out the City of Sydney's standard requirements for construction traffic management, which should be implemented by imposing appropriate conditions of consent.

In order to mitigate against any adverse impacts during the construction phase of the proposal, the management measures provided in the CMP should be implemented. Furthermore, a detailed final CMP should be prepared and submitted prior to the issue of the relevant Construction Certificate.

5.24 Ecologically Sustainable Development

There are five accepted ESD principles:

(a) *decision-making processes should effectively integrate both long-term and short-term economic, environmental, social and equitable considerations (**the integration principle**);*

(b) *if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation **(the precautionary principle)**;*

(c) *the principle of inter-generational equity - that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations **(the inter-generational principle)**;*

(d) *the conservation of biological diversity and ecological integrity should be a fundamental consideration in decision-making **(the biodiversity principle)**; and*

(e) *improved valuation, pricing and incentive mechanisms should be promoted **(the valuation principle)**.*

Having regard to the above ESD principles, we have made the following conclusions:

- The proposal has social, environmental and economic benefits for Sydney as a whole as it reuses two existing State Heritage listed buildings and provides the opportunity to prolong their life.
- The environmental impacts of the proposed works can be appropriately mitigated as discussed elsewhere in this EIS.
- The potential impacts of the proposal on the heritage fabric of the Buildings have been thoroughly assessed and considered to be acceptable.
- The site does not contain any threatened or vulnerable species, populations, communities or significant habitats.
- No significant climate change risks are identified because of this proposal.
- The proposed development represents a sustainable use of the site.
- The proposal does not impact upon biological diversity or ecological integrity.

Furthermore, the ESD features and initiatives included in the design of the development are specified in the Environmental Sustainability Management Plan, prepared by Wood & Grieve (**Appendix R**). The implementation of the initiatives will ensure that the Lands and Education Buildings will reduce the ecological damage commonly associated with construction and design and achieve 'Australian Best Practice'.

5.25 Site Suitability

Having regard to the characteristics of the site and its location, the proposal is considered suitable for the site as it will:

- revitalise two State significant heritage buildings to provide a world class luxury hotel within an iconic precinct in the heart of Sydney's CBD;
- be capable of being developed in a manner that will minimise impacts to the historical, natural, artificial, and environmental qualities of the site;
- will result in only minor environmental impacts that can be appropriately managed and mitigated; and
- will facilitate the renewal of the heritage buildings with considerable benefits to the local community.

The site is considered suitable for the proposed development in that:

- the location at the northern Sydney CBD is near existing transport, tourism and business infrastructure and is an appropriate location for a major hotel;
- it is capable of being appropriately serviced to accommodate future development;
- it has excellent access to a wide range of services and facilities that will support the hotel guests and staff; and
- it is well served by public transport.

5.26 Public Interest

The proposed tourist and visitor accommodation is in the public interest as it will:

- facilitate the delivery of a new world-class hotel that caters for domestic and international tourists, can host events, and can address the significant shortfall in high quality hotel accommodation;
- provide opportunities for public activity and will be a catalyst for significant public domain improvements to Farrer Place, Young Street, Gresham Street and Loftus Street;
- create new jobs during construction, with the proposed hotel providing ongoing employment opportunities during the operational phase; and
- result in a wide range of positive social and economic benefits to Sydney, New South Wales and Australia.

6.0 Environmental Risk Assessment

The Environmental Risk Assessment (ERA) establishes a residual risk by reviewing the significance of environmental impacts and the ability to manage those impacts. The ERA for the proposal has been adapted from Australian Standard AS4369.1999 Risk Management and Environmental Risk Tools.

In accordance with the SEARs, the ERA addresses the following significant risk issues:

- the adequacy of baseline data;
- the potential cumulative impacts arising from other developments near the Site; and
- measures to avoid, minimise, offset the predicted impacts where necessary involving the preparation of detailed contingency plans for managing any significant risk to the environment.

Figure 58 indicates the significance of environmental impacts and assigns a value between 1 and 10 based on:

- the receiving environment;
- the level of understanding of the type and extent of impacts; and
- the likely community response to the environmental consequence of the project;

The manageability of environmental impact is assigned a value between 1 and 5 based on:

- the complexity of mitigation measures;
- the known level of performance of the safeguards proposed; and
- the opportunity for adaptive management.

The sum of the values assigned provides an indicative ranking of potential residual impacts after the mitigation measures are implemented.

Significance of impact	Manageability of impact				
	5 Complex	4 Substantial	3 Elementary	2 Standard	1 Simple
1 – Low	6 (Medium)	5 (Low/Medium)	4 (Low/Medium)	3 (Low)	2 (Low)
2 – Minor	7 (High/Medium)	6 (Medium)	5 (Low/Medium)	4 (Low/Medium)	3 (Low)
3 – Moderate	8 (High/Medium)	7 (High/Medium)	6 (Medium)	5 (Low/Medium)	4 (Low/Medium)
4 – High	9 (High)	8 (High/Medium)	7 (High/Medium)	6 (Medium)	5 (Low/Medium)
5 – Extreme	10 (High)	9 (High)	8 (High/Medium)	7 (High/Medium)	6 (Medium)

Figure 58 – Risk Assessment Matrix

–				Risk Assessment		
Item	Phase	Potential Environmental Impact	Proposed Mitigation Measures and / or Comment	Significance of Impact	Manageability of Impact	Residual Impact
Aboriginal and Historical Archaeology	C	– Impacts to archaeological items of significance.	▪ Investigations into Aboriginal and historical archaeology and the potential for such items to be on the site was carried out by Curio Projects. The analysis found there is potential for the site to contain items of state significance. ▪ Mitigation measures, including the development of an Archaeological Research Design and Excavation Methodology are proposed as outlined in Section 7.0.	3	2	5 Low/Medium
Noise and Vibration	C + O	– Increase in noise levels during construction – Increase in noise resulting from operational plant	▪ Carry out construction during approved construction times only and in accordance with an approved Construction Management Plan. ▪ Install hotel glazing to the requirements of the Noise and Vibration Assessment. ▪ Install standard acoustic treatment such as acoustic attenuators, acoustic louvres and internal lining of ducts to ensure project specific noise levels at the boundary of surrounding receivers can be met	2	2	4 Low/Medium
Reflectivity	O	– Adverse solar reflectivity glare to motorists and pedestrians	▪ Glazing to ensure light reflectivity from building materials used on facades must not exceed 20%.	2	1	3 Low
Waste Management	C + O	– Generation of waste	▪ Manage construction waste in accordance with the Construction Management Plan which seeks to maximise the recycling of construction waste streams ▪ Bins, storage locations and collection to be in accordance with the submitted Operational Waste Management Plan.	1	1	2 Low
Air Quality	C	– Decrease in air quality	▪ Implement dust suppression and air quality control measures during construction in accordance with an approved Construction Management Plan.	1	1	2 Low
Heritage	C + O	– Impacts on heritage items	▪ Implement the recommendations of the Statement of Heritage Impact prepared by GBA ▪ Undertake works consistent with the Conservation Management Plan	4	2	6 Medium

7.0 Mitigation Measures

The collective measures required to mitigate the impacts associated with the proposed works are detailed in **Table 19** below. These measures have been derived from the previous assessment in Section 5.0 and those detailed in appended consultants' reports.

Table 19 – Mitigation Measures

Mitigation Measures
Archaeology ▪ The recommendations within the Aboriginal and Historical Archaeological Assessment prepared by Curio Projects dated October 2016 will be taken into consideration in the ongoing design development and confirmed prior to Construction Certificate Stage.
Accessibility ▪ The recommendations within the Access Report prepared by Morris Goding Access Consultants dated 14 October 2016 will be taken into consideration in the ongoing design development and confirmed prior to Construction Certificate Stage.
Building Code of Australia ▪ The recommendations within the BCA Assessment Report dated 14 October 2016 and Fire Safety Strategy dated 14 October 2016 will be taken into consideration in the ongoing design development and confirmed prior to Construction Certificate Stage.
Geotechnical ▪ The recommendations within the Geotechnical Desktop Study prepared by Pells Sullivan Maynink dated 21 March 2014 will be taken into consideration in the ongoing design development and confirmed prior to Construction Certificate Stage.
Construction Management ▪ The recommendations within the Construction Management Plan, prepared by Built Pty ltd, dated 24 October 2016 will be taken into consideration in the preparation of a detailed Construction Management Plan and confirmed prior to construction certificate stage.
Heritage ▪ The recommendations within the Statement of Heritage Impact, prepared by GBA Heritage, dated October 2016 will be taken into consideration in the ongoing design development of the proposal.
Hazards ▪ The recommendations within the Phase 1 Hazmat Report, prepared by CETEC, dated 23 September 2016 will be undertaken in the ongoing development of the proposal.

8.0 Conclusion

The Environmental Impact Statement has been prepared to consider the environmental, social and economic impacts of the proposed adaptive re-use and conversion of the Sandstone Precinct into a world class luxury hotel. The EIS has addressed the issues outlined in the Secretary's Environmental Assessment Requirements (**Appendix C**), the conditions of the Stage 1 consent and accords with Schedule 2 of the EP&A Regulation with regards to requirements of an EIS.

Having regard to biophysical, economic and social considerations, including the principles of ecologically sustainable development, the carrying out of the project is justified for the following reasons:

- there is a strategic need to revitalise two State significant heritage buildings to provide a world class luxury hotel within an iconic precinct in the heart of Sydney's CBD;
- the proposal will facilitate the delivery of a new world-class hotel that caters for domestic and international tourists, can host events, and can address the significant shortfall in high quality hotel accommodation;
- the proposal provides a catalyst for significant public domain improvements to Farrer Place, Young Street, Gresham Street and Loftus Street;
- the proposal displays design excellence, a high quality architectural form and does not give rise to any adverse visual impacts;
- the development is consistent with and complies with all the relevant strategic policies, environmental planning instruments, and plans and guidelines, including general compliance with the Concept Plan;
- the development will have some adverse heritage impacts on fabric but these are outweighed by a significant number of positives;
- the development will result in a wide range of positive social and economic benefits to Sydney, New South Wales and Australia;
- the development will help to reactivate and renew the out of date and underutilised heritage buildings and will better activate the streetscape;
- the development will be exemplar in its architectural design and appearance and will deliver modern elements that are respectful to the two buildings and their heritage; and
- there are no adverse environmental impacts that cannot be appropriately managed by the mitigation measures set out in this EIS.

Given the merits described above it is requested that the application be approved.