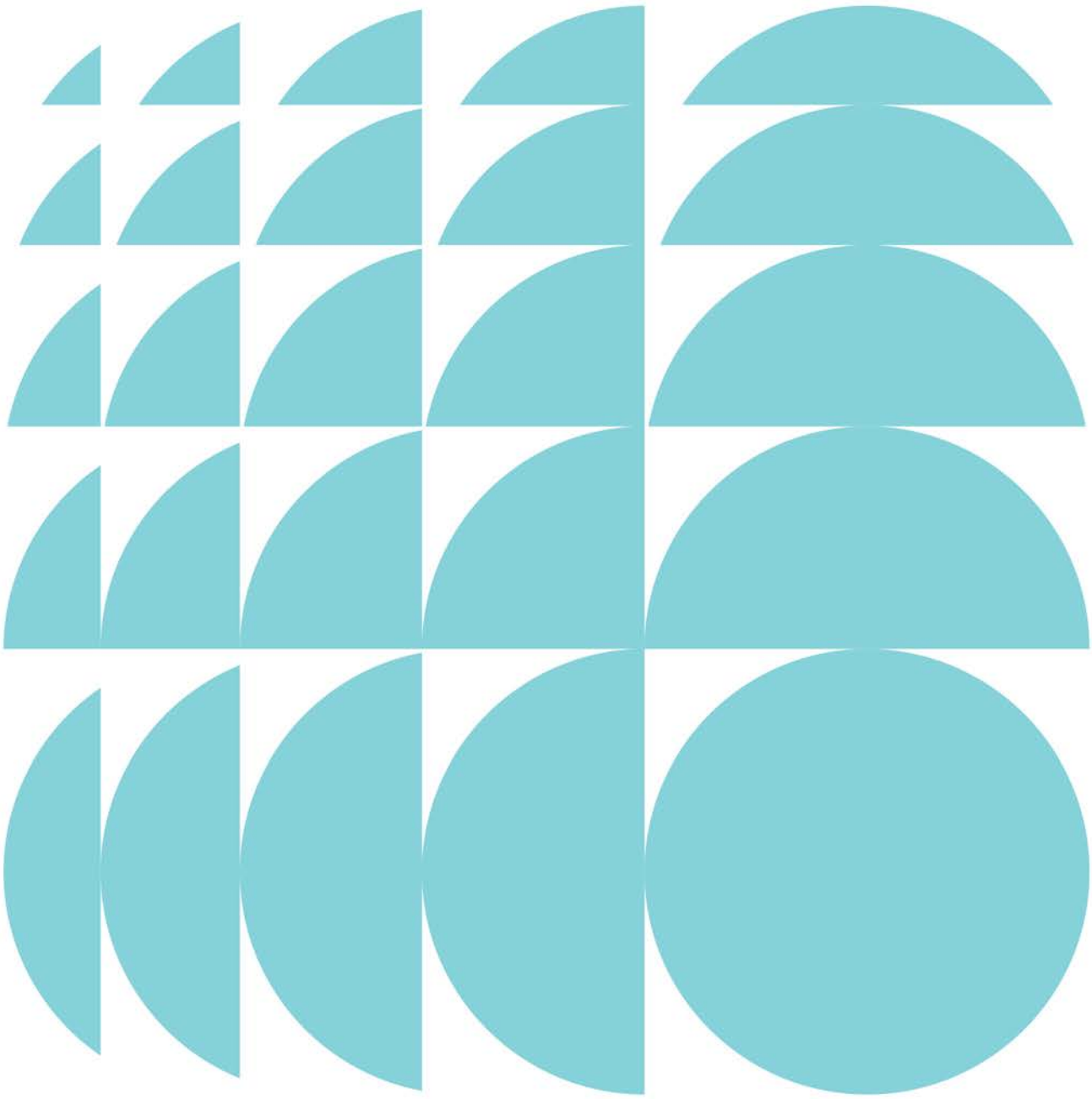
ETHOS URBAN

Response to Submissions
SSD 18_9347

Sydney Metro Martin Place - Integrated Station Development
Stage 1 Amending Development Application (SSD 18_9347)

Submitted to Department of Planning and Environment
On behalf of Macquarie Corporate Holdings Pty Ltd

2 November 2018 | 15879



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1.0 Introduction

An Environmental Impact Statement (EIS) was prepared on behalf of the proponent Macquarie Corporate Holdings Pty Ltd (Macquarie) in support of State Significant Development Application (SSD 18_9347) for a new Concept Development Application (DA) relating to the Sydney Metro Martin Place Station Precinct (Precinct), referred to as the Stage 1 Amending DA. The Stage 1 Amending DA seeks to amend the approved Concept Proposal for the Precinct (SSD 17_8351) in order to align the South Site's building envelope and Floor Space Ratio with the new planning controls approved under a recent amendment to the *Sydney Local Environment Plan 2012* (Sydney LEP).

For clarity, the new Stage 1 Amending DA specifically relates to the approved building envelope for the South Site. No change is proposed to the building envelope for the North Site as approved under the previous Concept Proposal (SSD 17_8351). The EIS and accompanying documents for the Stage 1 Amending DA were placed on public exhibition from 23 August to 19 September 2018. Public exhibition occurred in accordance with the requirements of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

In total, 13 submissions were received in response to the public exhibition of the EIS. These included submissions made by government agencies and authorities, and the general public. Macquarie and its expert consultant team have considered all issues raised in the submissions, and prepared a detailed response in this letter and the accompanying documents, in accordance with Clause 85A of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation).

1.1 Response to Submissions

To address issues raised in submissions, a range of documentation has been prepared. The following consultants' reports and supporting information have been updated and further supplement the material originally submitted in support of the EIS:

- Detailed record and response to submissions table prepared by Ethos Urban (**Appendix A**);
- Supplementary urban design analysis prepared by Tzannes (**Appendix B**);
- Supplementary wind assessment prepared by CPP (**Appendix C**);
- Supplementary shadow analysis prepared by Virtual Ideas (**Appendix D**);
- Floor plate impact assessment prepared by Arup and Grimshaw (**Appendix E**); and
- Supplementary heritage analysis prepared by TKD and Tzannes (**Appendix F**).

The revised supporting documentation will enable the Department of Planning and Environment (the Department) to complete its assessment of the proposal. This report should be read in conjunction with the EIS prepared by Ethos Urban and dated August 2018, as relevant.

1.2 Background

Since lodgement of the Stage 1 Amending DA, the NSW Government and Macquarie have reached a binding agreement (through the Unsolicited Proposal process) in relation to the delivery of the combined new Metro station and Over Station Development at Martin Place. Achievement of this milestone has also enabled Macquarie to progress with the formal submission of the final two planning applications required for the delivery of the OSD, being the Stage 2 DAs for the North and South Site OSD. The Stage 2 DAs for the North Tower and South Tower are on public exhibition until 7 November 2018.

Consideration of submissions made to the Stage 1 Amending DA by Macquarie and its expert project team have therefore had the benefit of being able to consider the implications and impacts on the detailed design, as developed for the Stage 2 DA.

2.0 Key issued and proponent's response

Government agencies and authorities

Ten (10) submissions (inclusive of the Department's letter) were received from government agencies and authorities in response to the exhibition of the EIS. Specifically, responses were received from:

- Department of Planning and Environment;
- City of Sydney Council;
- Government Architect NSW;
- Heritage Council;
- National Trust of Australia;
- Transport for NSW;
- Civil Aviation Safety Authority Company;
- NSW Environmental Protection Agency;
- Fire and Rescue NSW; and
- Water NSW.

A number of these submissions confirm that the relevant agency or authority had no further comment on the application, or simply provided guidance on recommended conditions. These include the submissions from Transport for NSW, the Government Architect NSW, the NSW Environmental Protection Agency, Fire and Rescue NSW, and Water NSW.

Members of the public

Three (3) submissions were received from the general public in response to the public exhibition of the EIS. These submissions concerned development contributions, the interface with Martin Place, and building heights. A response to those submissions is included in **Appendix A**.

The key issues raised in government agency and public submissions are discussed below. Where individual issues have not been discussed in this letter, a detailed response can be found in the table at **Appendix A**.

2.1 South Site – tower form

Issue

The submission from the City of Sydney recommends the inclusion of 8m by 8m recesses (cut-outs) at the southern corners of the South Tower building envelope above the podium. It was suggested that these recesses would provide 'a transition to the adjoining development to the south above the podium height' and reinforce 'the importance of the urban character and integrity of Martin Place and the associated city blocks'.

Proponent's response

The following sections detail the proponent's response to this issue.

2.1.1 Approved Concept Proposal

The Concept Proposal (SSD 17_8351) and consolidated Design Guidelines have already approved the principle of a tower built to the southern boundary along its full extent, as shown in Figure 1 and Figure 2 below.

As part of the approved Concept Proposal application, a robust assessment was undertaken of the environmental impacts associated with a South Tower building form built to the southern boundary and with zero setbacks to Elizabeth Street and Castlereagh Street. This assessment included:

- A full assessment of the visual impacts of the tower form when viewed from Elizabeth Street, Castlereagh Street and Martin Place. The assessment determined that the additional impacts were reasonable and that the tower form did not block any key views.
- An assessment of the overshadowing impacts from the tower form on city streets and Hyde Park. The assessment determined that the additional shadow impacts were reasonable, were within the parameters of the LEP Sun Access Planes and did not reduce the amenity of key CBD lunch time locations.
- An assessment of the wind impacts from the tower form on city streets and pedestrian amenity. This assessment determined that the increase in wind speeds and comfort ratings from existing conditions were minimal and within an acceptable range in the context of the site's redevelopment.
- An analysis of the degree of sky views that will be available from surrounding streets. The results from this analysis revealed that the impacts from the South Tower form (and North Tower form) will not alter the sky view thresholds currently enjoyed from streets surrounding the Precinct.

The assessment of each of these parameters also considered the approved tower form against a tower form which complied with the 8m tower street frontage setback control of the City of Sydney Development Control Plan (DCP - which is not applicable to this SSD application by virtue of Clause 3.43(5) of the EP&A Act). Nonetheless, and in all circumstances, the assessment illustrated that the difference in impact between the two scenarios was negligible and acceptable.

It should also be noted that the proposed amendment to the approved building envelope effectively seeks to align the approved building envelope on the site with the new planning controls for the site which were recently amended through a Planning Proposal (PP_2017_SYDNE_007_00). Notably, the environmental impacts of the proposed amendment to the building envelope were rigorously assessed through the Planning Proposal process and were also determined to be acceptable by the Department of Planning and Environment in its assessment of the proposal.

Accordingly, the scope of the Stage 1 Amending DA is limited to reducing the tower setback to Martin Place from 25m to 8m (consistent with the Site Specific planning controls applying to the land under Sydney LEP 2012). It does not seek to amend the approved eastern, southern or western tower setbacks – which were as considered in detail as part of the original Concept Proposal and deemed to be acceptable.

Overall, the Council's submission should be considered in light of what was previously considered to be acceptable by the Department, was subsequently approved and the scope of changes now being sought to the South Tower form. This is particularly so given the suggested 8m x 8m recesses at the tower corners have been tested, with the assessment (contained in this report and through the supporting information) demonstrating that the suggested recesses:

- will not result in any environmental benefit (refer to **Section 2.1.7**);
- would undermine the creation of a successful transition to the adjoining development to the south (refer to **Section 2.1.2**);
- would undermine the distinct threshold condition being created by the proposed development that reinforces the uniqueness and legibility of Martin Place and the Metro Precinct within the urban fabric of the city (refer to **Section 2.1.3**); and
- would restrict the flexibility of sites to the south in responding to the constraints of the Hyde Park Sun Access Plane in the scenario of their future redevelopment (refer to **Section 2.1.5**).

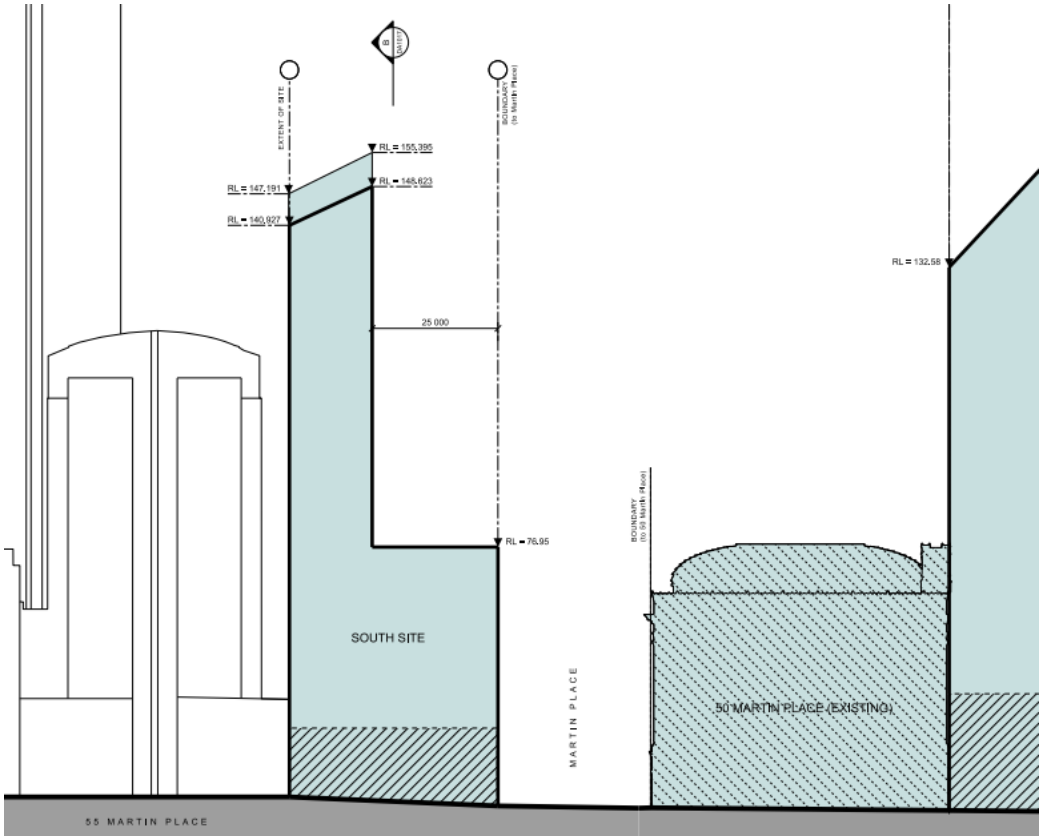


Figure 1 Approved elevation plan showing tower built to the southern boundary

Source: Grimshaw

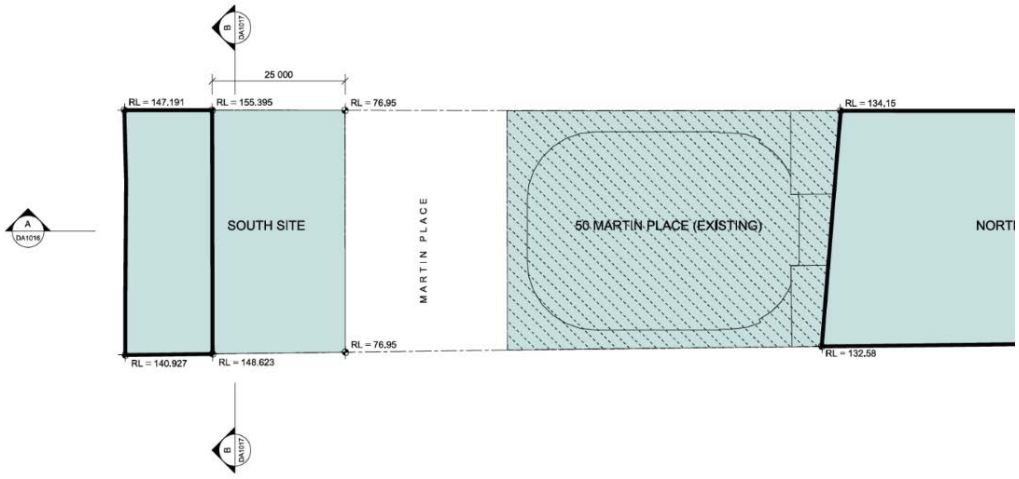


Figure 2 Approved roof plan showing tower built to full extent of southern boundary

Source: Grimshaw

Finally, by virtue of the integrated nature of the project which includes an integrated program to completion in-line with the delivery of the Sydney Metro infrastructure, the detailed design of both the station and OSD has necessarily been developed in parallel[1]. Therefore, the impacts of changing the building envelope on the detailed design of the building (both station and OSD) are quantifiable, given the progression of the detailed design to this point. This is discussed further in **Section 2.1.8** of this report.

[1] The detailed design of the OSD component of the South Site is the subject of a concurrent SSD application (SSD 18_9326)

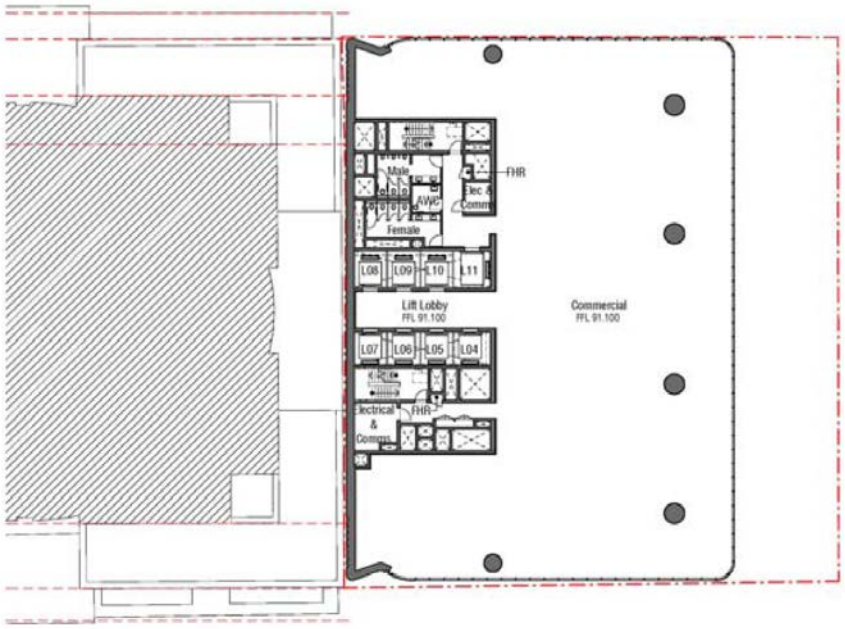
2.1.2 Creating a Transition

It is not agreed that 8m x 8m tower corner recesses would assist in creating a successful transition to the adjoining development to the south. The existing building to the south has a tower setback from Castlereagh Street of approximately 5 metres, a tower setback from Elizabeth Street of approximately 5.5 metres, and a podium height substantially less than the proposed podium height for the South Site. Development further to the south within this city block does not adopt any setback to Castlereagh Street or Elizabeth Street and does not have a podium. This development outcome, while noting is likely to have occurred prior to Council's current built form controls contained within its DCP applying, nonetheless reveals there is no consistent form to the buildings currently in the block to the south of the site.

The introduction of 8m by 8m recesses at a height of 45m will not relate to the existing development to the south, creating a potentially awkward built form relationship between the proposal and the adjoining and adjacent development. It dictates a new tower setback and podium height that is not represented in the existing development to the south, and limits the flexibility to redevelop land to the south with regards to podium height (discussed further in **Section 2.1.5** below).

One of the key purposes of adopting a zero setback to Castlereagh Street and Elizabeth Street for the South Tower was to promote flexibility for the future development of the adjacent site. The zero setback creates the possibility for a variety of podium heights and tower setbacks and ensures a high degree of flexibility for the architectural form of a future redevelopment of 60 Castlereagh Street. The suggested recesses will limit the architectural responses for land to the south, and will reduce the distinctiveness of Martin Place in the context of the streetscape. **Figure 3** illustrates how the proposed approach provides greater flexibility for the redevelopment of sites to the south.

This was discussed in detail at the Design Review Panel meeting associated with the South Site Stage 2 DA (SSD_18_9326), which is discussed further below.



Proposed scenario: Various setbacks can be accommodated to the south

Suggested corner recesses scenario: Dictates an 8m setback for the site to the south, reducing flexibility

Figure 3 Comparison of impact of proposed envelope and City's suggested amendments to the south

Source: Tzannes

2.1.3 Threshold condition to both Martin Place and the Metro Precinct

Introducing recesses at the southern corners of the tower will be detrimental to the creation of a defined threshold to Martin Place and the Metro Precinct; a key principle approved in the Concept Proposal's Consolidated Design Guidelines.

As part of the approved Concept Proposal, Tzannes identified the opportunity to enhance the distinctive character of Martin Place by reinforcing defined street edges along the north/south streets that intersect Martin Place. The effect of this is to produce 'thresholds' – or the differentiation of one space to another – that create a clear sense of arrival to Martin Place by creating a break in the pattern of tower setbacks in the city. This is created through distinct zero setbacks to both Castlereagh Street and Elizabeth Street in the approach to Martin Place. This treatment is supported in the Jahn Gehl study from 2015 that argued for development to prioritise the creation of distinct entries to Martin Place, achieved by creating a narrow entry through Castlereagh Street and Elizabeth Street and other cross-streets when approaching Martin Place.

The same can be said about the legibility of the Metro Precinct. As discussed by Tzannes in the Urban Design Report (EIS Appendix G), the introduction of significant public infrastructure should be legible through the city's built form. Built to boundary tower setbacks and aligning the faces of the South Tower and North Tower creates a distinct building skyline, introduces a sense of hierarchy, and allows the identification of the Metro to be more intuitive.

Including corner recesses at the tower level will undermine this threshold condition and thereby undermine the ability of the development to provide a clear sense of arrival to Martin Place. This will have the effect of diminishing Martin Place's differential or 'specialness' when moving through the city and as a one of Sydney's most important civic spaces.

Figure 4 illustrates the role of the southern wall in creating a threshold to Martin Place, with **Figure 5** modelling the suggested recesses and demonstrating its detrimental effect on the implementation of this principle by weakening the definition of this threshold edge.

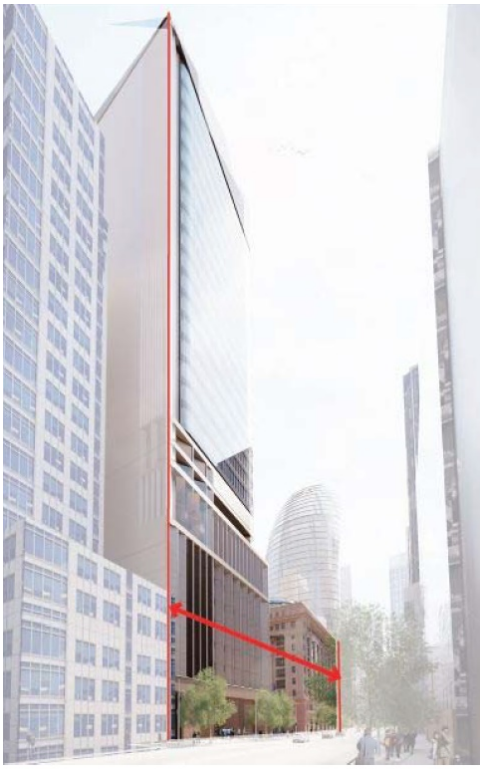


Figure 4 View looking north along Elizabeth Street highlighting the importance of the proposed southern wall to creating a threshold condition to Martin Place and the Metro Precinct

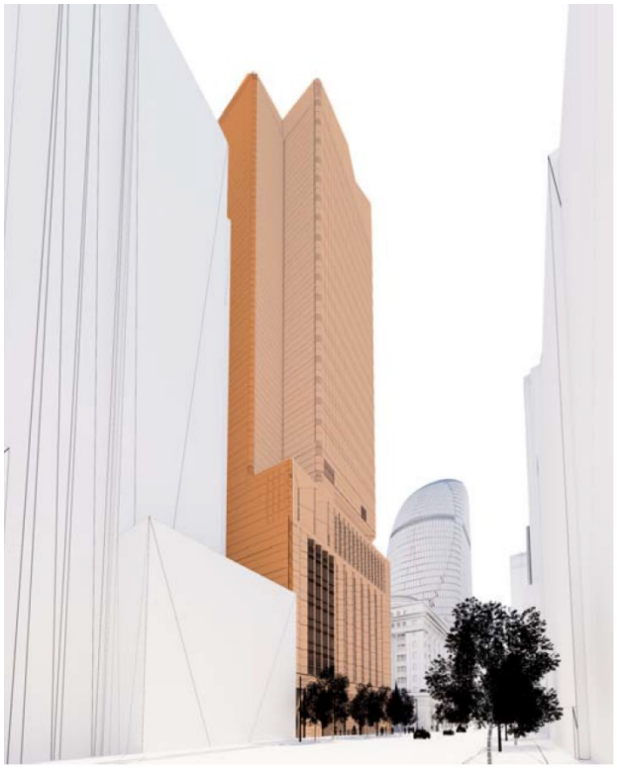
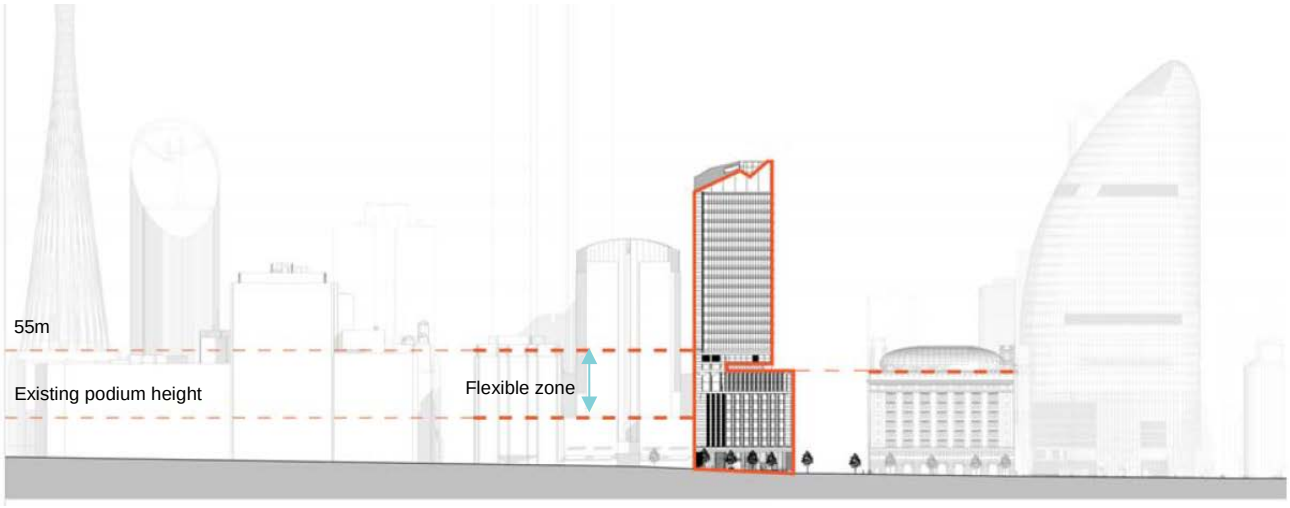


Figure 5 Illustration of the building envelope including the City's suggested amendments having regard to the establishment of a threshold condition to Martin Place and the Metro Precinct

Source: Tzannes

The proposed zero setback scheme also provides flexibility for the height of podium buildings to the south of the South Site, whilst establishing a distinct character for Martin Place. In fact, a change of podium height in future developments to the south, when compared to the defined relationship between the South Tower and 50 Martin Place, enhances the importance and distinctiveness of Martin Place in the context of the streetscapes of both Elizabeth Street and Castlereagh Street.

Figure 6 compares the two approaches and demonstrates how the proposal ensures a unique podium height to Martin Place.



Proposed scenario: Ensures the uniqueness of the Martin Place podium height

Suggested corner recesses scenario: Dictates a podium height for sites to the south commensurate with the Metro Precinct

Figure 6 Comparison of proposed envelope and City's suggested amendments having regard to the establishment of a unique podium height to Martin Place

Source: Tzannes

2.1.4 Application of Setback Controls on Sites to the South

As the current design reinforces the distinctiveness of Martin Place, it does not lead to an erosion of the application of setback requirements in current planning controls elsewhere in the city. The Consolidated Design Guideline requirements for the Martin Place Station Precinct, distinguish Martin Place as a threshold in the CBD, and encourage the application of the current City of Sydney controls elsewhere in the city. The departure from the typical city controls and formulation of a new set of built form controls were developed (and have since been approved) for the Precinct following an extensive urban design study led by Tzannes.

Options for recesses at the south east and south western corners as illustrated in **Figure 5** were presented to the DRP during the development of the South Site Stage 2 DA. Having considered the options, the DRP determined the recesses were not supported and has provided advice to Macquarie that it should continue to develop its current proposal to articulate the southern façade of the building, having regard to views from both Castlereagh Street and Elizabeth Street. The resolution of this façade through an appropriate design treatment rather than 8m recesses presents opportunities to create an interesting vista and importantly ensure its design does not prematurely pre-empt the future redevelopment of sites to the south by establishing arbitrary tower setback controls. The DRP process and outcomes to date is further discussed in **Section 2.1.9**.

2.1.5 Sun Access Plane (SAP) Constraint

Neither the approved Concept Proposal envelope, nor the proposed amendment, dictate or infer a podium height and/or street frontage setback for buildings to the south of the site. This situation allows greater flexibility and redevelopment options for these sites to the south, especially when considering they are already significantly constrained in terms of redevelopment potential given the Hyde Park Sun Access Plane.

The redevelopment potential of sites south of the South Tower would be substantially limited if they were required to conform to the podium and street frontage height datum suggested by Council as well as the Hyde Park SAP and would result in short, squat building envelopes; an arguably undesirable urban design and planning outcome for Elizabeth Street as an edge condition to Hyde Park. Defining the podium height could also have a potentially limiting effect on the flexibility of sites to the south to respond to the proportional relationship between the podium and the tower (as the height of the tower above the podium would be significantly reduced). This impact is shown in **Figure 7** below.

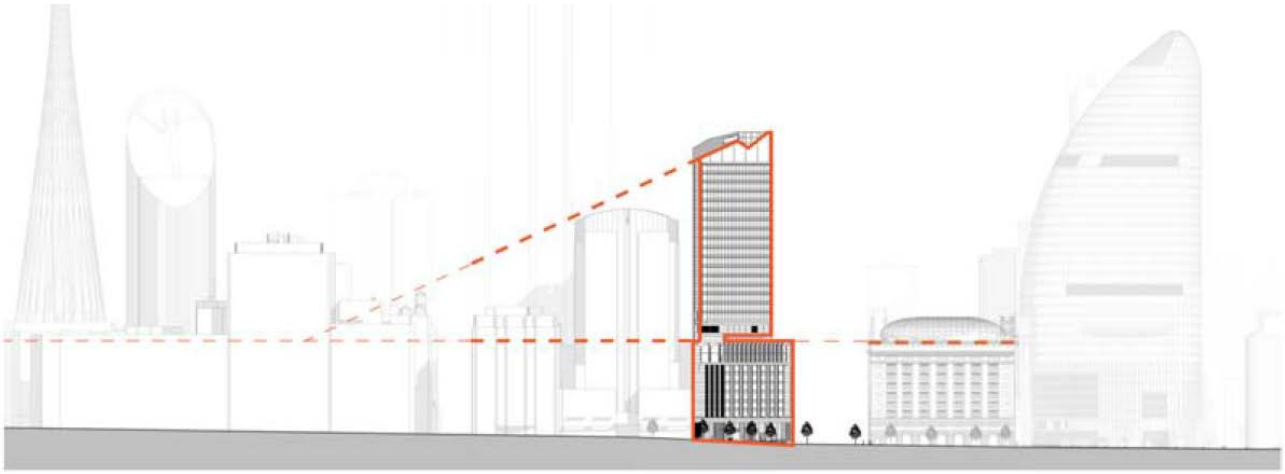


Figure 7 Elizabeth Street elevation illustrating the impact of 8x8m recesses as proposed by the City of Sydney

Source: Tzannes

2.1.6 Floor plates

Commercial premises and floor plates that meet market needs and expectations are an essential part of building a competitive Global City. The floor plates desired by major tenants fall in a range between 1,500-2,000m² Net Lettable Area (NLA). This is reiterated by the PCA's Premium Grade applying to a commercial building, with a floor plate of 1,200 m² NLA or above. The South Tower building envelope under the Stage 1 Amending DA offers 1,200m^2 of NLA for the podium levels and approximately 1,100m^2 of NLA for the tower levels above.

The introduction of 8m x 8m recesses above the podium will reduce the area of usable floor space to below 1,000m^2 of NLA (approximately 972m^2). This reduced floorplate impacts the ability of the South Tower to attract and accommodate premium multi-floor tenants and premium global businesses, which impacts the significance of Martin Place as a commercial centre in the CBD.

A reduction in the commercial floor plate will also fail to meet the unique strategic potential of the site or attract premium tenants. The proposed development is located above two intersecting rail lines/stations with immediate access to both the Metro and heavy rail networks. The site is uniquely and ideally placed to link high-quality commercial space with a major investment in public transport infrastructure.

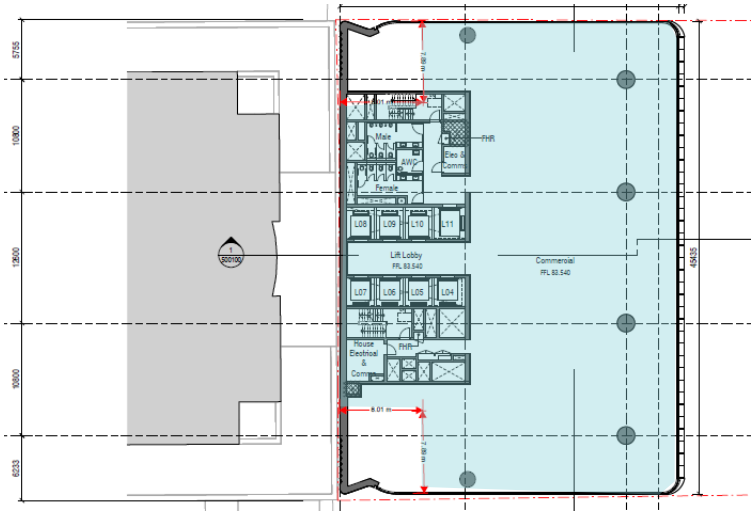


Figure 8 Indicative reduction in NLA for the tower and resultant floor plate

Source: Grimshaw / Ethos

2.1.7 Environmental Considerations

Introducing recesses in the proposed South Tower building façade will not result in any meaningful environmental benefit. The detailed technical studies that accompanied the EIS and approved Concept Proposal each considered the relative impact of the South Tower building envelope and compared it to a DCP compliant building envelope with 8m tower setbacks to Elizabeth Street and Castlereagh Street.

A summary of these assessments is provided below, with relevant comments included regarding the negligible environmental benefit of the City's suggested tower recesses:

- **Wind:** A supplementary wind assessment has been prepared by CPP (**Appendix C**) which confirms that the City's suggested 8m x 8m recesses at the tower corners of the South Tower would be a less significant change to the building massing than the tested 8m tower setback arrangement to Castlereagh Street and Elizabeth Street, which identified a negligible change to wind conditions. Hence, such recesses are not expected to have any impact on pedestrian wind amenity around the building.

  As demonstrated in Section 5.11 of the EIS, the proposed building envelope will not result in a substantially different wind environment than will otherwise be expected if the South Site contained 8m tower setbacks to all three street frontages (Martin Place, Castlereagh Street and Elizabeth Street). At street level, the existing wind environment near the Precinct is generally suitable for pedestrian standing and walking. These wind conditions are expected to improve with future detailed designs, and for station entrances, are anticipated to comply with the 'Pedestrian Standing' aspiration included in the Consolidated Design Guidelines endorsed as part of the Stage 1 Consent.
- **Overshadowing:** As part of the assessment of the approved Concept Proposal, a comprehensive overshadowing analysis of the (now approved) building envelope for the South Site was assessed, and considered reasonable, despite some minor additional overshadowing compared to the shadow cast by the existing building (prior to demolition works) on site.

  The proposed amendment to the approved building envelope seeks to align the tower envelope with the recent amendment to the LEP controls for the site, following the proponent-led Planning Proposal for the site (PP_2017_SYDNE_007_00). As discussed in Section 5.9 of the EIS, the shadow impacts of this amended envelope were tested as part of the Planning Proposal, which were determined as acceptable by the Department in its assessment. The amended envelope proposed with the subject application does not differ from the envelope assessed and deemed acceptable with the Planning Proposal.

  As discussed in Section 5.9 of the EIS, the proposed envelope amendment was also tested against a tower envelope which was set back 8 metres from all street frontages (Martin Place, Castlereagh Street and Elizabeth Street) – refer to Appendix O of the EIS. The testing demonstrated that the amended envelope will result in minor additional overshadowing of a small section of Hyde Park North at the "worst case" period of the year (i.e. midwinter) between 1:30pm and 3:00pm.

This impact is considered reasonable given the additional overshadowing occurs largely outside the Sun Access Plane's design period (12:00 – 2:00pm) and the ground level of this section of Hyde Park is already largely in shadow from the trees located in the affected area.

The assessment included in the EIS also noted that Condition B2 of the approved Concept Proposal (and the Consolidated Design Guidelines at Built Form 2.2) requires that the detailed building design not result in additional overshadowing of Hyde Park between the hours of 12 and 2 pm at mid-winter (21 June), when compared to the shadow cast by existing buildings, approved buildings and a LEP/DCP compliant envelope (8m tower setbacks to Elizabeth and Castlereagh Streets and 25m to Martin Place).

As part of this application, Condition B2 is proposed to be retained, but modified to reflect the updated LEP/DCP compliant envelope discussed above (8m tower setbacks to all street frontages) in line with the new LEP controls. Therefore, any future detailed design for the site will not overshadow this portion of Hyde, with the detailed design the subject of the concurrent Stage 2 DA achieving this 'reduction' in overshadowing (refer to SSD 18_9326).

In any event, a supplementary shadow analysis has been prepared by Virtual Ideas and is included in **Appendix D**, which tests the benefit of the City's suggested recesses at the tower corners. The analysis shows that, compared to the proposed tower envelope, the recesses result in an extremely negligible reduction in shadowing at various times throughout the year, primarily along Elizabeth Street and Castlereagh Street for a brief period, and a reduction in overshadowing of a minor portion of Hyde Park at approximately 2pm. **However, the proposed amendment to, and implementation of, Condition B2 of the approved Concept Proposal, will ensure this benefit is realised with the detailed design, to a greater degree.**

In summary, and as demonstrated in Section 5.9 of the EIS:

- The proposed amendment to the South Site building envelope will result in negligible additional overshadowing to surrounding streets and public spaces, especially Hyde Park North, when compared against the approved Concept Proposal;
- The Stage 1 Amending DA is fully compliant with the Sydney LEP 2012 Sun Access Planes and these will continue to be met, protecting pedestrian amenity derived from sunlight to important civic spaces such as Martin Place and Hyde Park; and
- The operation of Condition B2 (as proposed to be amended) will ensure the detailed design of the South Site tower will not result in additional overshadowing of Hyde Park compared to a development which complied with the 8m tower setback controls of the Sydney DCP and a development which incorporates the City of Sydney's suggested 8m x 8m recesses.

- **Views:** No material benefit from a visual impact perspective will be expected by the introduction of recesses at the corners of the tower, particularly as the proposed building envelope does not block any important views.

  As demonstrated in Section 5.7 of the EIS, while the Amending Stage 1 DA building envelope has an increased visual impact due to the increase in the bulk of the South Tower when compared to the South Site envelope in the approved Concept Proposal, this impact is minor in extent, with the built form playing an important role in enhancing the commercial significance of the CBD and the definition of Martin Place. The increase in both extent and importance of the built form of the proposed South Tower is an appropriate response to the importance the new transport interchange and development will have in the city.

Having regard to the above, the suggested recesses will not result in any notable or worthwhile environmental or public amenity benefits.

2.1.8 Building and Station Structural Considerations

Arup and Grimshaw have detailed the impact of the recesses on the structure of the building, and the potential flow-on effects to the station beneath, through a series of diagrams included in **Appendix E**.

The analysis confirms that the introduction of 8m by 8m recesses to the building envelope will potentially require a range of associated changes to the building and integrated station, including (but not limited to):

- moving the structural core wall that will require enhancements to the structure of the building, and revising the structure over the Eastern Suburbs Line (ESL) Rail tunnel to mitigate the increased stresses and associated risks;

- reducing the width of the through-block pedestrian connection;
- reconfiguring the loading bay that will reduce the available turning circle to an unfeasible size/configuration and render it unworkable;
- reducing the length of the core face which reduces the ability to spread out connections; and
- removing plant space on Levels 10, 11, 28 and 29 that will need to be re-accommodated elsewhere in the building.

As discussed in the introduction to this response, by virtue of the integrated nature of the project, including the integrated program to completion in line with the delivery of the Sydney Metro infrastructure, the detailed design of the project (station and OSD) has been developed in parallel[2]. Therefore, the structural impacts which any change to the building envelope will have on the detailed design (both station and OSD) are quantifiable (and summarised above), given the progression of the detailed design to this point.

With this information at hand, the impact to the detailed design of the project that will ensue from the introduction of building envelope recesses as suggested by the City, (in terms of structure and integration of the OSD and station components), would necessitate a redesign of the OSD.

Likewise with the design of the station, given the constraints of the Eastern Suburbs Line (ESL) Rail tunnels and the Metro Tunnel and Station Excavation (TSE) works, a re-evaluation of the southern section of the station would be required to accommodate the City's suggested envelope changes, given the highly integrated vertical nature of the design from the OSD down to the station.

These changes will not be achievable within the timeframe to deliver the integrated project. Any changes that put in jeopardy the design and delivery of the Sydney Metro project, which these suggested recesses would potentially do, are not considered to be reasonable, especially when considering there is proven (as detailed above) to be little to no benefit if implemented.

Figure 9 illustrates the current process and timeframe agreed between Sydney Metro and the TSE contractor for the design and construction of the Martin Place Station (South) and ESL interface (noting that the TSE station construction, south shaft piling design and south shaft excavation design are currently in progress).

Figure 9 Current Sydney Metro TSE Martin Place South Site program

[2] The detailed design of the OSD is the subject of a concurrent SSD application for the OSD component (SSD 18_9326).

2.1.9 Design Review Panels

The introduction of recesses in the South Tower was considered and reviewed by the site-specific Martin Place Over Station Development Design Review Panel (DRP) established to review the detailed design of the Sydney Martin Place Metro Precinct. The DRP considered three potential options and determined that setbacks above podium level at the south east and south west corners were not supported as the desired or ultimate outcome for the South Site. This determination was formerly documented in the DRP advice for DRP Meeting #6. An extract from the advice is included below:

> *"We support the current approach to podium expression which presents a positive outcome for Martin Place. We also support the architecture of the podium as it relates to Castlereagh and Elizabeth Streets.*
>
> *We note and support the emphasis of the structural elements between the tower and the podium. We support the proposed articulation of the roofline to address sun access to Hyde Park.*
>
> *…*
>
> *We note proposals to increase the setbacks at the south east and south west corners of the tower to improve architectural expression and urban design outcomes for the block,* ***however these are not supported****. In particular, the proposal for windows on the southern façade should not be pursued."*
>
> (our emphasis in **bold**)

It is noted however that the design of the southern façade of the tower included as part of the Stage 2 DA (SSD 18_9326) is an articulated response to the building and streetscape to the south. The southern façade is proposed to be constructed from ceramic panels with patterns, textures and finishes along the edges to visually wrap-around the eastern and western facades. The thorough attention and design focus on this southern elevation has been influenced by comments provided by the Design Review Panel and ensures that a holistic and integrated design approach to the building is adopted.

The proposed building envelope for the South Site under the Stage 1 Amending DA is the best possible outcome for the site. It has been consistently supported by Tzannes in their Consolidated Design Guidelines, and is discussed further in the analysis prepared by Tzannes (**Appendix B**).

In addition, Macquarie has also frequently engaged with Sydney Metro's program-wide Design Review Panel, the Sydney Metro DRP to seek advice on the design aspects of the station. The Sydney Metro DRP is distinct from the Martin Place OSD DRP and is responsible for providing independent advice to Sydney Metro for all station elements at Martin Place. The Sydney Metro DRP has been presented with, and supports, the current station design configuration which is predicated on a built to boundary tower solution.

2.2 Wind

Issue

The Council's submission also noted that the amended building envelope for the South Site will result in increased wind speeds in specific locations when compared to the approved Concept Proposal (locations 17-19 and 23-26) and recommended that design options which retain the current comfort ratings be considered.

Proponent's response

A response letter has been prepared by CPP, which is included in **Appendix C**.

Whilst wind speeds in the majority of the locations nominated by the Council have increased slightly as a result of the amended building envelope compared to the approved building envelope, other locations experience a decrease.

In any event, the majority of these changes do not change the comfort rating at that location as approved with the Concept Proposal. Locations 18 and 25 are the exception, where the comfort rating has changed from 'pedestrian

standing' to 'pedestrian walking', as addressed in Section 5.11 of the EIS. The change in the comfort rating at these two specific locations is considered to be acceptable for the following reasons:

- The increase in wind speeds in these locations is minor;
- The degradation in comfort category also occurs under the LEP/DCP Compliant scheme;
- The measured 5% exceedance in wind speeds at Location 25 is close to the boundary between two comfort categories; and
- The results relate to sheer envelopes with no mitigation measures proposed. These wind conditions are expected to improve with future detailed designs, and for station entrances, are anticipated to comply with the 'Pedestrian Standing' aspiration included in the Consolidated Design Guidelines endorsed as part of the Stage 1 Consent.

Importantly, the assessment demonstrated that the proposed building envelopes will not result in a substantially different wind environment than would otherwise be expected if the Precinct was developed with envelopes which contained 8m tower setbacks to all three street frontages (Martin Place, Castlereagh Street and Elizabeth Street). The Council also recommend that design options which retain the current comfort ratings be considered. In response, it is considered that the approved concept building envelope for the South Site is the relevant benchmark for measuring the wind performance for the proposal, as the impacts of the approved envelope were considered acceptable, subject to achieving the 'Pedestrian Standing' comfort rating at pedestrian entrances (which is achieved by the amended envelope).

As a separate point, it is noted that wind conditions are improved in the detailed design of the South Tower, as outlined in the Pedestrian Wind Environment Study accompanying the Stage 2 DA for the South Site (SSD 18_9326). This detailed analysis accompanying the Stage 2 DA confirms that the surrounding pedestrian environment complies with the relevant safety criteria, and that pedestrian comfort has been improved at every location when compared to the building envelope (other than one location, which still meets the desired 'pedestrian standing' criterion). Accordingly, the detailed design of the South Tower already largely achieves the objective of retaining or improving comfort ratings.

In view of the above, it has been demonstrated that the proposed building envelope is capable of providing an acceptable pedestrian environment and does not warrant further review or amendment.

2.3 Heritage

Issue

Submissions received from the Heritage Council and the National Trust of Australia (National Trust) raised the following concerns:

- The proposal will impact the established character of Martin Place by altering the established setback and scale, and as such the potential impacts are likely to be noticeable rather than negligible.
- The podium of the proposed building *does* meet the "well-enclosed and largely continuous building line combining to form a grand and imposing urban space" for Martin Place.
- The Heritage Impact Statement does not adequately address the greater impacts arising from the reduced setback and enlarged building envelope on surrounding heritage items and the character of Martin Place. It does not assess the consistency of the amended concept design with the Heritage Development Guidelines and the Consolidated Design Guidelines (in particular Section 2.3, no's 8, 12, 13, 14 and 15).
- The Heritage Council considers that the future detailed design of the tower building and the podium will need to be articulated to ensure the podium is predominant and contributes to achieving the opportunity described in the HIS to reinforce the character of Martin Place, and in particular the relationship with 50 Martin Place.

Proponent's response

The following sections detail the proponent's response to this issue.

2.3.1 Established scale and character of Martin Place

The proposed Stage 1 Amending DA envelope in no way detrimentally impacts the distinctive qualities of Martin Place. The proposed envelope has been developed from a site-specific study of the spatial qualities and built form of Martin Place, as well as extensive research into the history of its design and development. As outlined in the supplementary urban design analysis prepared by Tzannes (**Appendix B**), the proposed development responds to the scale and character of Martin Place as follows:

- The South Tower podium follows the street alignment and matches the established street setback to Martin Place. This is consistent with the LEP controls, approved Concept Proposal and the Consolidated Design Guidelines.
- The proposed building envelope enables the delivery of a podium that is consistent with the streetwall height datum of 50 Martin Place, creating a uniform streetwall in this part of Martin Place.
- The podium can be distinguished from the tower through a building recess that contributes to the legibility of the podium and the definition of the street, as described in the approved Consolidated Design Guidelines.
- The building envelope complies with the Sun Access Plane, which defines the maximum height of the building on the site.
- The tower setback responds to the setback of the adjacent Reserve Bank of Australia building, the rhythm of tower setbacks on the southern side of Martin Place, and the changing character of Martin Place at the commercial eastern end. Towers to the west of MLC tend to have deeper setbacks while the towers to the east have lesser ones. There is no established or defined tower setback from Martin Place, and as such the proposed building envelope has been developed as a response to a deep understanding of its context. The tower setback is consistent with the Sydney LEP.

The proposed building envelope responds to the context of the site and will deliver a development that addresses the scale and character of Martin Place.

2.3.2 Building line and urban space

As detailed in the supplementary heritage analysis prepared by Tzannes (**Appendix F**), the proposed development is capable of delivering a building that contributes to the “well-enclosed and largely continuous building line combining to form a grand and imposing urban space” for Martin Place. The following site-specific strategies create the opportunity for a building that is tailored to its particular position in Martin Place and helps form a grand human, urban space and suitably scaled ‘urban room’:

- The building envelope responds to the dominate building line and street alignment of development fronting Martin Place.
- The podium will be scaled to match the height and proportions of the existing 50 Martin Place building, creating a well-defined and enclosed ‘urban room’ between the buildings.
- The podium will relate to the dominate height of 50 Martin Place, which is consistent with the historic building height in this section of Martin Place.
- The articulation and materiality of the podium, and the introduction of active ground floor uses with individual entries, will contribute to creating a more human scale.

2.3.3 Consistency with the Guidelines

The Heritage Impact Statement (HIS) prepared by TKD contains Heritage Development Guidelines that have been amended to reflect the Stage 1 Amending DA and to be consistent with the Consolidated Design Guidelines prepared by Tzannes. The HIS therefore responds to, and outlines, the amended heritage and built form guidelines and the impacts arising from the amended building envelope. The HIS and the supplementary letter prepared by TKD (**Appendix F**) confirms that the amended building envelope will permit the development of a new building that responds to its context and respects Martin Place, and that is consistent in scale, alignment and height of the neighbouring historic buildings.

2.3.4 Podium design

The replacement of the existing building on the South Site creates the opportunity for the new building to better respond to the strong liner character, spatial enclose, materiality and architectural expression of Martin Place and surrounding development. This opportunity has been achieved in the detailed design of the South Tower and its podium, as outlined in the HIS that accompanies the Stage 2 DA for the South Site (SSD 18_9326) and discussed as follows:

- The South Tower reintroduces the dominant building form alignment of buildings in the area, reinforcing the strong linear character and spatial enclosure of Martin Place.
- The podium reflects the height, composition, materiality and form of the 50 Martin Place building, to retain the landmark qualities and civic presence of the building within Martin Place and its environs.
- The South Tower adopts the prevailing street frontage height established by 50 Martin Place, Qantas House, and Chifley Square, continuing this key height datum through the Precinct.
- The tower is setback from Martin Place above the podium and protects views of the GPO Clock Tower along Martin Place.
- The podium is divided into a base, shaft and termination that is similar to the composition of the facades of 50 Martin Place, retaining a human scale at the street as established by the 50 Martin Place building.

3.0 Amendments to the application

The details provided in this assessment demonstrate that the amended building envelope can achieve the site-specific design principles and that no change is required or warranted to the proposal as exhibited. No change is therefore proposed to what originally was sought for approval as detailed within the Stage 1 Amending DA EIS.

4.0 Final mitigation measures

The collective measures required to mitigate the impacts associated with the proposed works are detailed in Section 8.0 of the EIS. These measures have been derived from the assessment undertaken to date, as relevant, and those measures and recommendations detailed in consultants' reports, and are not required to change on the basis that no additional environmental impacts have been identified through the RTS process.

5.0 Conclusion

The proponent, Macquarie, and its expert project team have considered all submissions made in relation to the public exhibition of the proposed Stage 1 Amending DA.

A considered and detailed response to all submissions made has been provided with this report and the accompanying documentation.

In responding to and addressing the range of matters raised by government agencies and authorities, independent bodies, and the general public, Macquarie has commissioned supplementary modelling and assessment to support the amended Concept Proposal application, and to confirm the cumulative and relative impacts of the proposal and appropriate mitigation measures.

Any suggested envelope/design changes need to be closely and seriously considered in the context of the project being one of Australia's first truly integrated transport, commercial, retail and dining precincts. With this innovation in project delivery comes a deep responsibility to first and foremost protect the design integrity of the Metro Martin Place station, which has already passed significant design, contractual, and approval milestones.

It has been demonstrated that the proposal on-balance will provide significant benefits to the future of the Precinct and external benefits more broadly for the city. The 8m by 8m recesses do not deliver meaningful benefits to amenity, and were not supported in the approved Consolidated Design Guidelines or endorsed through the DRP design excellence process.

The continued design development, testing, and refinement of the building envelope through to Stage 2 will address a number of detailed matters considered in the submissions and yield the best possible outcome for the site and surrounds that appropriately minimise or mitigate environmental impacts.