Savills Level 7, 50 Bridge Street Sydney NSW 2000



# Attention: Holly Rhoades, Project Manager

# Subject: Sydney Metro Martin Place Station Precinct: SSD 18\_9347 Stage 1 Amending Development Application – response to submissions by the National Trust (NSW) and the NSW Heritage Council

Further to your request, we have reviewed the submissions received from the National Trust (NSW) and the NSW Heritage Council in response to the Stage 1 Amending Development Application for the Sydney Metro Martin Place Station Precinct. The Amending DA seeks to approval for a revised building envelope for the South Building at 39 Martin Place to align the envelope with approved City of Sydney Local Environmental Planning controls which permit an increase in building height.

The relevant extracts from the submissions and our responses are outlined in the attached table.

Please contact us if you have any queries.

Yours sincerely TANNER KIBBLE DENTON ARCHITECTS PTY LTD

anyymthi

George Phillips Practice Director NSW Registration No. 7651

Tanner Kibble Denton Architects Pty Ltd | ABN 77 001 209 392 | www.tkda.com.au

Sydney Level 1, 19 Foster Street, Surry Hills NSW 2010 Australia | T+61 2 9281 4399

Brisbane Suite 9A, Level 7, 141 Queen Street, Brisbane QLD 4000 Australia | T+61 7 3087 0160

Principals Alex Kibble, Robert Denton, Megan Jones, John Rose | Practice Directors George Phillips, Jocelyn Jackson, Melanie Mackenzie Senior Associates Ian Burgher, Angelo Casado, David Earp, Anna Harris, Emma Lee, Scott MacArthur, Renata Ratcliffe, Lachlan Rowe Associates Asta Chow, Paul Dyson, Sean Williams

NSW Nominated Architects Robert Denton Registration No 5782 | Alex Kibble Registration No 6015

#### NATIONAL TRUST (NSW) SUBMISSION

#### Comment

In the Trust's view, 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.

# Response

This response is supportive of the podium component of the proposed building envelope.

# Comment

However, the reduction of the tower setback to Martin Place from 25 metres to 8 metres, is contrary to the provisions of the Sydney City Council Development Control Plan for this site and will impact adversely on the maintenance of the "very human, urban space" so vital to the public's use and enjoyment of Sydney's grand civic space.

# Response

The heritage and visual impacts of the proposed modification of the tower component of the envelope are assessed in the 'Statement of Heritage Impact', June 2018. The assessment concluded that the tower element of the proposed envelope is visible predominantly from more distant vantage points from within Martin Place. From close range vantage points, the podium element largely occupies the foreground, reinforcing the historic street wall of Martin Place.

The proposed envelope is consistent with the principles for new development in Martin Place in accordance City of Sydney's 2012 DCP:

Conserve and enhance the significance of Martin Place as one of Central Sydney's grand civic and ceremonial spaces, and as a valued business location.

The proposed envelope for the South Site will:

- provide the potential for future development to conserve and enhance the significance of Martin Place as a grand civic and ceremonial space and as a valued business location; the proposed envelope will allow for the construction development of a new building which better responds to the civic and ceremonial character than the present building in scale, street alignment and height and through the setback of the tower component.
- retain and enhance the urban character, scale and strong linear enclosure of Martin Place by being built to the street alignment, having a street frontage height consistent with the prevailing building height and by setting the tower above the podium back from the street alignment.
- provide the opportunity for a future building to maintain a human scale at street level through the establishment of a
  podium which respects the established historic streetscape scale and alignment. The Heritage Development Guidelines
  included in the HIS provide principles for the detailed design of the building relating to materials and architectural
  expression.

#### NSW HERITAGE COUNCIL SUBMISSION

#### Comment

The HIS [Heritage Impact Statement] assesses that the potential impacts of the enlarged envelope is negligible in comparison to the previously approved envelope; that the impact of a future building on the South Site on the significance of neighbouring heritage items are generally minor or neutral in relation to their streetscape presentation and setting; and that the proposed building has the potential to enhance the significant characteristics of the street through its architectural expression, scale, form and materials. The Heritage Council assessment is that the potential impacts are likely to be noticeable rather than negligible and the proposal will impact the established character of Martin Place by altering the established setback and scale.

# Response

The proposed podium component of the South Site envelope permits the development of a new building on the site which is built to the street alignment and with a street wall height consistent with the height of historic buildings in the street. The alignment and height of the podium element of a future building will relate purposefully to neighbouring buildings including the former Government Savings Bank of NSW building at 48-50 Martin Place, the APA Building at 53-63 Martin Place, the GIO Building at 60-70 Elizabeth Street and the MLC Building at 42-56 Martin Place. Collectively, these buildings, together with a future building on the South Site which will reinforce and enhance the historic Martin Place streetscape and setting. The tower component of the proposed envelope —set back from the street alignment — relates purposefully to the set back established by the historic Reserve Bank Building at 65 Martin Place.

The submission provided by the National Trust (NSW) is supportive of the podium element of the proposed building envelope.

# Comment

The HIS 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. The HIS, CDG [Consolidated Design Guidelines] and Environmental Impact Statement do not assess the consistency of the amended concept design with the Heritage Development Guidelines (SOHI, Section 6) and the guidelines of the CDG, in particular Section 2.3 Built Form (Guidelines nos. 8, 12, 13, 14 and 15).

# Response

Sections 5 and 6 of the Statement of Heritage Impact address the impact of the proposed amended building envelope on neighbouring heritage items, namely:

- The former Government Savings Bank of NSW Building at 48-50 Martin Place
- The APA Building at 53-63 Martin Place
- The GIO Building at 60-70 Elizabeth Street
- The MLC Building at 42-56 Martin Place

The assessment concludes that proposed envelope has the potential for a new building which will relate purposefully to neighbouring heritage items through the scale, height and alignment of the podium element and through the set back of the tower component.

The visual analysis of the amended enveloped included in the Statement of Heritage Impact concludes that the tower component will be visible predominantly from more distant vantage points from within Martin Place. From close range vantage points, the podium element largely occupies the foreground, reinforcing the historic street wall of Martin Place.

The Built Form Guidelines contained in section 2.3 of the Consolidated Design Guidelines (Tzannes, July 2018) are consistent with the Heritage Development Guidelines contained in section 6 of the Heritage Impact Statement. The proposed amended envelope is consistent with the guidelines as follows:

6 Heritage Development Guidelines	2.3 Built Form Guidelines	Comment
<ul> <li>(Heritage Impact Statement)</li> <li>Retain and enhance the setting and streetscape presence of neighbouring heritage buildings.</li> <li>Retain and enhance the urban character, scale and strong linear enclosure of Martin Place.</li> </ul>	<ul> <li>(Consolidated Design Guidelines)</li> <li>1. Retain and enhance Martin Place as one of the city's grand civic and ceremonial spaces through the retention and enhancement of its urban character, scale and strong linear enclosure.</li> <li>2. Reinforce the streetwall and distinctive attributes of this block on Martin Place.</li> </ul>	<ul> <li>The proposed South Site building</li> <li>envelope will permit the development of</li> <li>a new building in Martin Place which</li> <li>aligns with the historic street wall height</li> <li>is consistent with the street alignment of historic buildings</li> <li>is consistent with the scale of the historic buildings</li> <li>reinforces the strong linear enclosure of the street</li> <li>has a tower component set back from the street alignment above the podium, consistent with historic and more recent development in Martin Place .</li> </ul>
Retain and enhance the setting and streetscape presence of neighbouring heritage buildings.	<ul> <li>11. Retain and enhance the setting and streetscape presence of neighbouring heritage buildings.</li> <li>12. Podium streetwalls The buildings are to have zero setbacks for their podiums to match the predominant street alignment</li> </ul>	The podium element of the proposed envelope is consistent in scale, alignment and height of the neighbouring historic buildings at - 53-63 Martin Place - 60-70 Elizabeth Street - 42-56 Martin Place The set back of the tower element of the proposed building envelope is consistent with the set back established by the historic Reserve Bank Building.



161035 181016 SMMPS Amending DA - Response To Heritage Submissions.Docx

# Comment

The HIS states that "replacement of the present building on the South Site at 39 Martin Place provides an opportunity for a new podium which better reinforces the strong lineal character and spatial enclosure of the street in its height, scale, materiality and architectural expression.

The Heritage Council considers that the future detailed design for 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.

# Response

The assessment of the detailed design of the building on the South Site is provided in the 'State Significant Development Application — Stage 2, Statement of Heritage Impact', August 2018, prepared by Tanner Kibble Denton Architects. The assessment concludes that the design of the building been carefully and purposefully considered to minimise potential impacts on 50 Martin Place, on the Elizabeth Street and Castlereagh Street streetscapes and on adjacent heritage items as follows:

- The podium reflects the height datum set by the parapet of 50 Martin Place to ensure that the streetwall on Martin Place, Elizabeth Street and Castlereagh Street are reinforced;
- The podium interprets the architecture of the highly significant building at 50 Martin Place and relates it to other significant buildings along the street;
- The architectural expression of the podium maintains the monumental civic character of the street and minimises impacts on heritage items in the vicinity of the South Site;
- Impacts of the tower component are minimised by its setback from the Martin Place frontage of the South Site, the visual separation of the tower from the podium, and an external cladding of reflective materials that minimise its visual bulk.

