E T H O S U R B A N

Request for Secretary's Environmental Assessment Requirements

Stage 1 Amending Development Application Sydney Metro Martin Place Station Precinct

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

15 May 2018 | 15879



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1.0 Introduction

This report is prepared on behalf of Macquarie Corporate Holdings Pty Limited (Macquarie) in support of a request for the Secretary's Environmental Assessment Requirements (SEARs) relating to a proposed new Concept Development Application (DA) for the Sydney Metro Martin Place Station Precinct. This DA, hereafter referred to as the Stage 1 Amending DA will seek approval for an amended concept for the Precinct.

The Stage 1 Amending DA follows:

- Approval granted by the Minister for Planning on 22 March 2018 for a Concept Proposal for the Sydney Metro Martin Place Station Precinct (the Precinct) involving two OSD commercial towers above the northern (North Site) and southern (South Site) entrances of Martin Place Metro Station (SSD 17_8351), which approved building envelopes, land uses, Gross Floor Areas (GFA) and Design Guidelines with which the detailed design (otherwise known as a Stage 2 DA) must be consistent ('Concept Approval').
- Gazettal on 4 May 2018 of site specific amendments to the Sydney Local Environmental Plan 2012 (Planning Proposal reference: PP_2017_SYDNE_007_00) (the Planning Proposal) permitting greater building height (over a portion of the South Site) and additional floor space (over both the North and South Sites).

The subject Stage 1 Amending DA is a new Concept DA made under Section 4.22 of the *Environmental Planning and Assessment Act 1979* and seeks approval for an amended concept for the Precinct in order to align the South Site's building envelope and FSR with the new planning controls approved under the Planning Proposal.

As the project is within a rail corridor/related to rail infrastructure, involves a commercial premises, and has a capital investment value of more than \$30 million, it is State Significant Development (SSD) for the purposes of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The requested SEARs will inform the preparation of an Environmental Impact Statement (EIS) to accompany the proposed Stage 1 Amending DA.

To support the request for SEARs, this report provides an overview of the proposed development, sets out the statutory context, and identifies the key likely environmental and planning issues associated with the proposal.

1.1 Context

The New South Wales (NSW) Government is implementing Sydney's Rail Future (Transport for NSW, 2012), a plan to transform and modernise Sydney's rail network so that it can grow with the city's population and meet the needs of customers in the future.

Sydney Metro is a new standalone rail network identified in Sydney's Rail Future. The Sydney Metro network consists of Sydney Metro Northwest (Stage 1) and Sydney Metro City & Southwest (Stage 2).

Stage 2 of the Metro entails the construction and operation of a new Metro rail line from Chatswood, under Sydney Harbour through Sydney's CBD to Sydenham and then onto Bankstown through the conversion of the existing line to Metro standards. The project also involves the delivery of seven (7) new Metro stations, including Martin Place. This step-change piece of public transport infrastructure once complete will have the capacity for 30 trains an hour (one every two minutes) through the CBD in each direction catering for an extra 100,000 customers per hour across the Sydney CBD rail lines.

On 9 January 2017 the Minister approved the Stage 2 (Chatswood to Sydenham) Metro application lodged by Transport for NSW (TfNSW) as a Critical State Significant Infrastructure (CSSI) project (reference SSI 15_7400) (the CSSI Consent). Work is well underway under this approval, including demolition of buildings at Martin Place. The Sydney Metro approval has been modified a number of times, including a modification (Mod 3) approved on 22 March 2018 which incorporated Macquarie's proposed scheme for Martin Place.

The OSD development for each of the Metro Stations is subject to separate applications to be lodged under the relevant provisions of the EP&A Act.

1.2 Site Description

The Sydney Metro Martin Place Station Precinct comprises land owned by Macquarie and land acquired by Transport for NSW (TfNSW) for the purposes of delivering the Sydney Martin Place Station.

The Precinct comprises the entire City block bounded by Hunter Street, Elizabeth Street, Martin Place and Castlereagh Street; that portion of Martin Place located between Elizabeth Street and Castlereagh Street; and the northern most property in the block bounded by Martin Place, Elizabeth Street, King Street; and Castlereagh Street.

Together it constitutes an above ground site area of approximately 9,400 square metres, with a dimension from north to south of approximately 210 metres and from east to west of approximately 45 metres. It also incorporates a portion of one of Sydney's most revered public/civic spaces – Martin Place.

The Concept Approval in effect divided the Sydney Metro Martin Place Station Precinct into a series of 'subprecincts' relating to the following properties:

- North Site 50 Martin Place; 9-19 Elizabeth Street; 8-12 Castlereagh Street; 5 Elizabeth Street; 7 Elizabeth Street; and 55 Hunter Street.
- South Site 39-49 Martin Place.
- Martin Place being that part bound by Elizabeth Street and Castlereagh Street (this land was specifically excluded from the Concept Proposal).

This SEARs request whilst encompassing the Precinct, principally relates to the South Site. A separate request for SEARs has been lodged with the Department of Planning and Environment (the Department) to address the Stage 2 detailed development of the North Site, and another request has been lodged for SEARs for the Stage 2 detailed development of the South Site. All works relating to Martin Place and the public domain fall within the CSSI consent and will not be the subject of a future SSD DA.

A context map of the Sydney Metro Martin Place Station Precinct and an aerial photograph indicating the North Site and South Site are included at **Figure 1** and **Figure 2** below.



The Precinct

Figure 1 – Context map of the Precinct Source: Google Maps + Ethos Urban



Figure 2 – Aerial photo of the North Site and South Site in context *Source: Nearmap + Ethos Urban*

2.0 Background

2.1 Sydney Metro Stage 2 Approval (SSI 15_7400)

On 9 January 2017, the Minister approved Stage 2 of the Sydney Metro project, involving the construction and operation of a Metro rail line between Chatswood and Sydenham, including the construction of a tunnel under Sydney Harbour, links with the existing rail network, seven Metro stations (including a station at Martin Place), and associated ancillary infrastructure. The project approves the demolition of existing buildings at Martin Place, excavation and construction of the new station (above and below ground) along with construction of below and above ground structural and other components of the future OSD, although the fit-out and use of such areas are the subject of separate development approval processes.

Modification 3 (approved on 22 March 2018) to the Sydney Metro approval enabled the inclusion of Macquarieowned land at 50 Martin Place and 9-19 Elizabeth Street within the Martin Place Station footprint, and other associated changes (including a new below ground unpaid concourse beneath 50 Martin Place and retention of access to the existing MLC pedestrian link).

2.2 Concept Proposal (SSD 17_8351)

On 22 March 2018, the Minister approved, subject to conditions, a Concept Proposal (SSD 17_8351), relating to the Sydney Metro Martin Place Station Precinct. This Concept Approval established the planning and development framework through which to assess the detailed Stage 2 applications.

Specifically, the Concept Approval encompassed:

- Building envelopes for OSD towers on the North Site and South Site (see Figure 3) comprising:
 - 40+ storey building on the North Site
 - 28+ storey building on the South Site
 - Concept details to integrate the North Site with the existing and retained 50 Martin Place building (the former Government Savings Bank of NSW)
- · Predominantly commercial land uses on both sites, comprising office, business and retail premises
- A maximum total GFA of 125,437m² across both sites (104,240m² on the North Site and 21,617m² on the South Site)
- Consolidated Design Guidelines to guide the built form and design of the future development
- A framework for achieving design excellence
- Strategies for utilities and services provision, managing drainage and flooding, and achieving ecological sustainable development
- Conceptual OSD areas in the approved Martin Place Metro Station structure, above and below ground level¹



Figure 3 - North Site and South Site Approved OSD Building Envelopes

¹ Refers to those components within the Metro CSSI approved station envelope that will contain some OSD elements not approved in the CSSI consent. Those elements include the end of trip facilities, office entries, office space and retail areas, along with other office/retail plant and back of house requirements that are associated with the proposed OSD and not the rail infrastructure.

2.3 Planning Proposal

On 4 May 2018 a site specific amendment to Sydney LEP 2012 relating to the Sydney Metro Martin Place Station Precinct was gazetted. The new site specific provisions that apply to the Precinct under Sydney LEP 2012 allow for a larger South Site envelope setback 8 metres from the Martin Place alignment up as high as the Hyde Park North Sun Access Plane. It also permits an FSR of 22:1 on the South Site. **Figure 4** illustrates the envelopes achievable under the Planning Proposal.

The Concept Proposal (SSD 17_8351) was prepared and determined prior to gazettal of the site-specific Sydney LEP 2012 amendment, and was developed based on the height development standards that applied to the South Site at the time. As a result, the approved Concept Proposal allows for a tower on the South Site that is now inconsistent with the building envelope envisaged through Sydney LEP 2012. The Concept Approval is therefore required to be amended before any Stage 2 Detailed DA for the OSD on the South Site is determined which reflects the new planning controls given effect by the Planning Proposal.



Figure 4 - North Site and South Site Sydney LEP 2012 Envelopes

3.0 The Project

The Stage 1 Amending DA will seek approval for an amended Concept for the Martin Place Metro Station Precinct, specifically a larger OSD building envelope for the South Site compared to the OSD building envelope approved by the Minister through SSD 17_8351. Again for clarity, this Stage 1 Amending DA is a Concept DA made under Section 4.22 of the EP&A Act.

The amended South Site envelope will reflect a building envelope that aligns with the new controls applying to the Precinct under the Sydney LEP 2012, including increased height and FSR limits. It is proposed to amend the South Tower building envelope, through (refer to **Figure 5**):

- a tower setback to Martin Place of 8 metres above the 55m podium height (reduced from 25 metres as per the Concept Approval);
- a tower height that is consistent with the Hyde Park North Sun Access Plane beyond the 8m setback to Martin Place (constituting a generally taller tower than the Concept Approval); and
- an increase in GFA (and FSR) for the South Site from approximately 23,700m² (12.5:1 FSR) up to approximately 41,700m² (22:1 FSR), inclusive of all CSSI Station components.



Approved South Site OSD Envelope

Proposed Amended South Site OSD Envelope (aligning with site specific amendment to Sydney LEP 2012)

Figure 5 – Relationship between the approved and proposed amended South Site building envelope *Source: Grimshaw*

No change is proposed to the Concept Approval as it relates to the North Site.

In summary, the Stage 1 Amending DA will seek approval for a new Concept comprising:

- Building envelopes for OSD towers on the North Site and South Site (see Figure 4) comprising:
 - 40+ storey building on the North Site
 - 28+ storey building on the South Site
 - Concept details to integrate the North Site with the existing and retained 50 Martin Place building (the former Government Savings Bank of NSW)
- Predominantly commercial land uses on both sites, comprising office, business and retail premises

- A maximum total GFA of 18.5:1 on the North Site and 22:1 on the South Site (inclusive of CSSI Station GFA);
- · Consolidated Design Guidelines to guide the built form and design of the future development
- A framework for achieving design excellence
- Strategies for utilities and services provision, managing drainage and flooding, and achieving ecological sustainable development
- Conceptual OSD areas in the approved Martin Place Metro Station structure, above and below ground level²

Whilst the application will relate to the whole Precinct, the only changes compared to the Concept Approval are to the South Site envelopes and GFA/ FSR. The EIS, therefore, will focus on those changes. It will include:

- A full description of the proposed changes to the Concept
- A full list of all drawings that are changed, and copies of all revised drawings
- A full description of any proposed changes to the Concept Approval conditions arising as a result of the amended Concept, and a tracked changes version of the proposed modified conditions of consent, and
- · A comprehensive assessment of the impacts of the proposed changes

It is proposed to request that a condition/s be imposed on any approval of the Stage 1 Amending DA pursuant to Section 4.17(1)(b) of the EP&A Act, requiring the modification of the Concept Approval (SSD 17_8351) upon the commencement of the Stage 1 Amending Development Consent, in accordance with the procedures under Clause 97 of the *Environment Planning and Assessment Regulation 2000* (EP&A Regulation). This condition/s would address any inconsistency between the original Concept Approval and the Stage 1 mending Concept (and any subsequent detailed consents, in particular the Stage 2 DA for the South Site).

Section 4.17(1)(b) of the EP&A Act makes it clear that a condition of a development consent may be imposed requiring the modification (or surrender) of another development consent relating to the same land. Furthermore section 4.17(5) of the EP&A Act provides:

"If a consent authority imposes (as referred to in subsection (1) (b)) a condition requiring the modification or surrender of a consent granted under this Act ... the consent .. may be modified .. subject to and in accordance with the regulations."

This power to modify a consent is quite separate from the modification power under section 4.55 of the EP&A Act, as confirmed by the NSW Land & Environment Court (with respect to the previous sections 80A and 96 of the Act) in *Waverly Council v C M Hairis* Architects (2002) NSWLEC 180. (2002) 123 LGERA.

Submitted separately to this Stage 1 Amending DA will be detailed proposals for the South Site (South Site Stage 2 DA) and North Site (North Site Stage 2 DA). The North Site Stage 2 DA will be consistent with the Concept Approval for the Precinct and the proposed Concept.,

The South Site Stage 2 DA on the other hand, is based on a design which is inconsistent with the envelope in the Concept Approval, but consistent with the proposed Concept for the South Site in the subject Stage 1 Amending DA. Accordingly the South Site Stage 2 DA must be determined following approval of the subject Stage 1 Amending DA.

Figure 6 below is a diagrammatic representation of the suite of key planning applications undertaken or proposed by Macquarie and their relationship to the subject Stage 1 Amending DA.

² Refers to those components within the Metro CSSI approved station envelope that will contain some OSD elements not approved in the CSSI consent. Those elements include the end of trip facilities, office entries, office space and retail areas, along with other office/retail plant and back of house requirements that are associated with the proposed OSD and not the rail infrastructure.



Figure 6 – Relationship of key planning applications *Source: Ethos Urban*

4.0 Statutory and Strategic Planning Context

The key planning instruments applying to the Precinct and its development are the *State Environmental Planning Policy (State and Regional Development) 2011* (SEPP SRD) and the *Sydney Local Environment Plan 2012* (Sydney LEP), as discussed in more detail below.

The EP&A Act establishes the assessment framework for State Significant Development. Under Section 4.37 of the EP&A Act, the Minister for Planning is the consent authority for State Significant Development. Section 4.12(8) requires that a development application for SSD is to be accompanied by an Environmental Impact Statement (EIS).

Pursuant to Section 4.22 of the EP&A Act, a Concept DA may be made setting out concept proposals for the development of a site (and may include detailed proposals for the first stage of development), and for which detailed proposals for separate parts of the site are to be the subject of subsequent DAs. This SEARs request relates to a Concept DA, which following any approval will, through the imposition of conditions under Section 4.17(1)(b) of the EP&A Act, amend the original Concept Approval (ensuring consistency as there will then be only one approved Concept for the Precinct).

The project will contribute to the achievement of a number of key State, Regional and Local planning objectives/polices, including *NSW State Priorities*, *The Greater Sydney Region Plan, Eastern City District Plan, Sustainable Sydney 2030, Draft Central Sydney Planning Strategy,* and *Sydney City Centre Access Strategy.*

4.1 State Environmental Planning Policy (State and Regional Development) 2011 (SEPP SRD)

SEPP SRD identifies development which is declared to be State Significant Development (SSD). Under Item 19(2) of Schedule 1 of SEPP SRD, development within a railway corridor or associated with railway infrastructure that has a capital investment value of more than \$30 million and which is for the purposes of commercial premises is declared to be SSD for the purposes of the EP&A Act.

The proposed Stage 1 Amending DA qualifies as SSD and will be assessed under the relevant provisions of Part 4 of the EP&A Act.

SSD applications are treated differently to regular 'local' and 'regional' developments, with a range of other legislation not applying (refer to Section 4.41 and 4.46 of the EP&A Act) and other legislation needing to be applied consistent with the terms of any SSD consent (Section 4.42 of the EP&A Act). Development Control Plans are specifically excluded from being applicable to SSD (Clause 11 SEPP SRD).

The Minister for Planning is the consent authority for SSD (Section 4.37 of the EP&A Act).

4.2 Sydney Local Environment Plan 2012 (Sydney LEP)

Sydney LEP 2012 is the principal local environmental planning instrument applying to the Precinct, It establishes (amongst other things):

- · zoning and permissible land uses;
- development standards (e.g. height, FSR, car parking etc); and
- design excellence requirements

Land Uses

The Precinct is located within the B8 Metropolitan Centre Zone. The objectives of the zone are:

- To recognise and provide for the pre-eminent role of business, office, retail, entertainment and tourist premises in Australia's participation in the global economy.
- To provide opportunities for an intensity of land uses commensurate with Sydney's global status.
- To permit a diversity of compatible land uses characteristic of Sydney's global status and that serve the workforce, visitors and wider community.
- To encourage the use of alternatives to private motor vehicles, such as public transport, walking or cycling.
- To promote uses with active street frontages on main streets and on streets in which buildings are used primarily (at street level) for the purposes of retail premises.

The relevant land uses for the Precinct were established under the Concept Approval, comprising commercial uses including office and retail spaces, which are permitted with consent within the B8 land use zone. The subject Stage 1 Amending DA retains the same consistent permitted land uses as the Concept Approval.

Building Height and Floor Space

The Stage 1 Amending DA will comply with the maximum building height, sun access planes, and maximum floor space controls applying to the Precinct under Sydney LEP 2012.

Design Excellence

An alternative design excellence process (involving a Design Review Panel) was proposed as part of the original Concept Proposal (SSD 17_8351) and supported by the Department and the Office of the Government Architect NSW. The Concept Approval required as a condition of consent that a Martin Place OSD Design Review Panel (DRP) be established by the proponent prior to the lodgement of the Stage 2 DAs (refer Condition A14 of the Concept Approval). This has been done, with the first meeting of the Martin Place OSD DRP held on 1 May 2018.

The Stage 1 Amending DA will retain the same approach to achieving Design Excellence as the Concept Approval.

4.3 Biodiversity Conservation Act 2016

Clause 7.9 of the *Biodiversity Conservation Act 2016* applies to SSD and requires that a Biodiversity Assessment Report accompany such applications. Clause 7.9 states as follows:

7.9 Biodiversity assessment for State significant development or infrastructure

(1) This section applies to:

(a) an application for development consent under Part 4 of the Environmental Planning and Assessment Act 1979 for State significant development, and

(2) Any such application is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.

(our emphasis bold)

As per subclause (2), it is considered that the proposed development is not likely to have any impact on biodiversity values given the site's location in the Sydney CBD and the heavily urbanised nature of the precinct. A request that the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values and that a Biodiversity Development Assessment Report is not required for the project will be made under separate cover.

5.0 Preliminary Key Issues Identified

The following potential impacts and anticipated key issues have been identified and will be addressed in the EIS:

- **Compliance with Strategic and Statutory Plans:** This will include a summary of all National, State, District or Regional, and Local plans and strategies relevant to the proposal, and how the proposal addresses those documents. Of particular importance is how the Stage 1 Amending DA will address the new site-specific provision relating to the Sydney Metro Martin Place Station Precinct within the Sydney LEP 2012.
- **Built Form**: The design response will be a key issue to be addressed. This will include a comprehensive response on how the South Site built form will change to align with the new planning controls that apply under Sydney LEP 2012, and how this change will respond to the surrounding context and other principles for the siting and design, environmental performance, heritage, vistas and connectivity, street activation, pedestrian spaces, building massing, articulation, materials and finishes.
- Floor Space Ratio: The application will include area schedules and plans to clearly demonstrate compliance under Sydney LEP 2012.
- Heritage Impacts: A large number of heritage items are located in the vicinity of the Precinct, as identified in the Sydney LEP 2012. Heritage impacts will therefore be an important consideration, particularly in relation to impacts on the State listed 50 Martin Place, the locally listed Martin Place, and other surrounding heritage items. A Heritage Impact Statement will be lodged with the application.

- **Design Excellence:** The endorsed regime for achieving Design Excellence under the existing Concept Approval will be adopted for the Stage 1 Amending DA..
- **Connectivity and Integration with the Metro Station:** Macquarie's proposal will be a strong contributor for growing and sustaining Sydney's role as a global centre for business. This growth and enhancement of the CBD is in large part due to the Metro, and the arrival experience on entering the City through this new transport portal, the grand public spaces that will be created, and the place making architecture and urban design. The EIS will provide a description and assessment of the interface between the OSD and the Station.
- Solar Access: The Hyde Park North Sun Access Plane (relevant to the South Site) and Martin Place Sun Access Plane (relevant to the North Site) will be complied with under this proposal, with a full shadow study assessment submitted to demonstrate compliance.
- Wind Impacts: Wind tunnel testing of the built form will be undertaken as part of this application. It will identify any mitigation measures required for the detailed design of the OSD. The detailed design of the OSD will aim to deliver improvements to comfort and safety ratings for pedestrians.
- Ecologically Sustainable Development: The proposal will confirm how it will continue to achieve the relevant targets established under the Concept Approval and explore opportunities to achieve stretch targets in ecologically sustainable design. An ESD Strategy will be included as part of the EIS.
- Traffic, Access and Public Transport: The Sydney Metro represents a monumental uplift in sustainable public transport for the Sydney Metropolitan Region. The Macquarie proposal builds on this by offering integrated office and related land uses to create an inspiring and transformative transport hub that welcomes workers and visitors alike. It supports transit-oriented development, with no on-site car parking proposed to be located on the South Site. The Macquarie proposal will also provide generous bike parking and end of trip facilities for all workers in the development. Various assessments will accompany the EIS, addressing the following:
 - Pedestrian movements and capacity;
 - Integration with the proposed Metro and other rail infrastructure;
 - Provisions for service vehicle access and loadings;
 - Traffic generation;
 - Construction management;
 - Accessibility to other public transport; and
 - Initiatives to encourage sustainable transport options.
- Noise and Vibration: In view of the integrated nature of the proposal, it is important that the application provide an assessment of the main noise generating sources and activities, including a consideration of noise and vibration impacts associated with the trains running beneath the commercial development.
- Crime Prevention and Security: The proposed development forms part of a new transport node and significant destination within the Sydney CBD. Safety and security will be a key issue in determining the functionality and usability of the Martin Place Metro Station and associated OSD and will be the subject of separate Crime Prevention Through Environmental Design (CPTED) and Security assessments.

6.0 Expected Deliverables

To assist in confirming the SEARs, the following are the expected deliverables to support the EIS. These will focus on the differences between the Approved Concept and the proposed Concept:

- DA Form and DA fees.
- QS/CIV Certificate.
- Site Survey Plan.
- Architectural Design Statement/Report.
- Architectural Plans for approval (and indicative plans of possible future North and South Towers).
- Urban Design Report and Design Guidelines
- Flood Assessment/Stormwater Management Plan.
- Utilities Infrastructure Analysis.

- Heritage Impact Assessment.
- Shadow Studies and Verification.
- Wind Assessment.
- Traffic, Access and Parking Report.
- Noise and Vibration Report.
- DDA/Access Assessment.
- CPTED/Security Assessment.
- ESD Strategy.
- Waste Management Plan.
- Construction Management Plan.
- Air Quality Assessment.
- Airspace Assessment
- View Impact Analysis
- Skyview Assessment.
- Consultation Report.
- Physical Model.
- · Amended Concept Approval conditions of consent

7.0 Consultation

The EIS will include a detailed analysis and summary of the consultation undertaken previously and up to the lodgement of the application. It is anticipated that the following key agencies and stakeholders will be consulted at appropriate stages in the process:

- Department of Planning and Environment (as the assessment agency).
- Transport for NSW (especially the Sydney Metro team).
- Sydney Trains.
- Sydney Buses.
- Heritage Council of NSW.
- Utilities and Service providers.
- City of Sydney Council.
- Surrounding landowners / occupiers.
- The broader community.

8.0 Conclusion

The purpose of this report is to request the SEARs for the preparation of an EIS relating to a new Concept DA (Stage 1 Amending DA) for Sydney Metro Martin Place Station Precinct. The proposal comprises a unique opportunity to contribute to the legacy of the Sydney Metro program and constitutes an important component of the overall Martin Place Metro Station Precinct.

The Stage 1 Amending DA follows on from the issue of the Concept Approval Development Consent (SSD 17_8351) issued by the Minister for Planning on 22 March 2018, and the gazettal of the new LEP controls on 4 May 2018. It is one of three new development applications necessary to realise the vision for the Martin Place Metro Station Precinct.

The Stage 1 Amending DA has the effect of aligning the South Site building envelope and FSR with the new planning controls secured under the Planning Proposal.

The overall scheme for the Precinct seeks to achieve an exceptional single integrated development outcome, delivering efficiencies gained from combining the land holdings and releasing associated constraints on this complex site. The integrated OSD and Station proposal optimises the functionality of the development opportunity, the connectivity between Station entrances, public spaces and the OSD, with leading commercial office design.

The information detailed in this report is considered sufficient to enable the Secretary to issue the SEARs for the preparation of the EIS.