

Date received: 3/01/2021

Name: Kerstin Buccoliero

Suburb: Surry Hills

Submission content:

Dear Madam, Sir,

I am obviously not an artist nor architect... Just a visionary. As much as I like the renewal submission, I believe it's a prior pandemic design. The pandemic has shown that high rise buildings and hubs are difficult as it has often been a loooong wait to be allowed in the lift-observing social distancing rules! I believe a huge ground floor with lots of entrances and cascading buildings are the future. This allows outdoor escalators from the corners to the next level. Indoor lifts are reserved for wheelchair access, families with prams, diverse disabilities or people working on the small top floors. To make up for the large building at ground level, I love to see roof gardens and hedges. the middle could be used as a water filter from the Hand washing areas and plants like reed could be used.. the recycled water could be used to flush toilets. However, I don't know if such a building would fit the space.. or just one cascading tower?!? The post pandemic world needs total new ideas as the mutations of the virus indicate that there is no going back to how we lived, build and gathered before, including that now working from home is very popular especially in jobs concerned with technology. Please reconsider and may find a new generation of architects and artists.. what a petty I can't send a photo of how amazing this looks in my mind ... kind regards Kerstin

Date received: 1/01/2021

Name: Anonymous

Suburb: Ultimo

Submission content:

Not much comment but I think is good to build up a new environment and new look

Date received: 20/12/2020

Name: Kevin Farmer

Suburb: Surry Hills

Submission content:

As previously discussed, I am generally supportive of redevelopment of the area in question, with my prime concerns relating to environmental aspects - overshadowing, access, wind tunnel creation and open public space.

I note that in the Block C overview, overshadowing rules for Prince Alfred Park only apply up to 1400 on any day. As this development is to the west of the park, any associated over-shadowing would not generally occur until after that time as the sun sets, so I request that this ruling be amended to state that there must NEVER be any over-shadowing of the park as this would seriously affect natural growth (grass, trees, etc), animal life and public enjoyment of the park space.

Another key concern is for any wind-tunnel effect which may be created by the approved height of buildings as shown. I recall this being an issue at Whitlam Square when The Connaught was being built and now that surrounding area is almost entirely uncomfortable for anyone passing through due to the constant wind which can now not be contained. This must not be allowed to happen in the new development around Central.

Date received: 15/01/2021

Name: Andrew Gibbes

Suburb: Huskisson

Submission content:

To whom it may concern,

You must be kidding!

This proposal must not go ahead.

No rezoning, no hideous "development" over this precious building.

It's death by a thousand cuts the way the remaining heritage of Sydney is being destroyed

Date received: 16/01/2021

Name: Kevin Shaw

Suburb: Camperdown

Submission content:

I would be very disappointed if the Adina Hotel were to be replaced by a taller building, even if the Federation facade were to be preserved. I would rather that the scale of buildings in the Railway Square precinct be decided by the Marcus Clark buildings and the present Adina Hotel.

Date received: 20/01/2021

Name: Valerie Le Bihan

Suburb: Surry Hills

Submission content:

I am not against redevelopment of the area covered by the Western gateway planning proposals but as with Block A and B (consultation for which I missed the deadline because it was not advertised properly to property owners on the East side of the railway), I disapprove of the changes to the allowable bulk and height for block C that this rezoning proposal is all about.

The Adina Hotel building is a lovely building, the appearance of which will not be enhanced by the superposition a 40+storey building on top of it.

It will also suffer from the height and bulk of Block A and B and so will Central Station.

The assessments for streetscape views have been conveniently done from points which show the future situation in its best light.

Even though, the Central station buildings viewed from somewhere like Belmore Park, will no doubt appear dwarfed by tower A and C especially since the plan indicates a distance of only 14 to 16 m between the 2 buildings.

I also fail to understand the need for more office or retail or hotel space in the current situation.

One would think Tech hubs do not require various businesses to work in geographical proximity since they have to best of technology available to keep them connected.

Something many other businesses have been achieving during this pandemic.

Date received: 22/01/2021

Name: Anonymous

Suburb: Bellevue Hill

Submission content:

Re

"The public realm is to provide an elegant and functional solution to level changes across the site that support seamless, step free, accessible access suitable for people of all abilities, connections and transitions from Lee Street to the Devonshire Street tunnel as well as the future over-station development within the broader Central Precinct."

The DARLING DIVE railway Tunnel from Mortuary Station to Darling Harbour contains significant historic items such as the original convict sandstone tunnel and the remnants of the Gauntlet track (important to train aficionados) runs under the project near LEE St. There does not appear to be adequate pedestrian connectivity with the whole project (A, B, and C) at surface and subterranean levels,

Date received: 26/01/2021

Name: Anonymous

Suburb: Chippendale

Submission content:

I support the construction of the new Atlassian HQ and the vision for this area to become a tech hub.

Please consider ways in which Chippendale can be better linked to Prince Alfred Park, Central Station and Surry Hills, for example by way of new tunnels or other pedestrian and cycle ways linking Lee Street to Chalmers and Elizabeth Streets.

Please also consider greening this area with new street trees and rain gardens, increasing pedestrian amenity, widening footpaths and reducing traffic. Increasing amenity with density is important to bring the community along in the process.

Please consider expediting the coverage of the train tracks between Central and Redfern, and the conversion of this space into public/community space, green space and commercial space. These tracks currently cut this part of the city down the middle and make getting around this part of town difficult.

Date received: 26/01/2021

Name: Zane Maber

Suburb: Jannali

Submission content:

Why is it that this building is to involve the demolition of heritage and the building over/inside of heritage areas?

The Central/Sydney Terminal section of land including Belmore Park is one of an increasingly fewer number of areas that remains untouched from high-rise buildings and the increasingly dumb property race to the sky in Sydney. The proposed buildings are absolutely horrendous aesthetically, and completely ruin the look of the lovely sandstone buildings that comprise Central station.

The fact that heritage of the area (the 'Central State Significant Precinct') is having to be rezoned tells you exactly how stupid this is. That you are having to be underhanded to even consider this project is beyond belief, and the fact that the building looks so utterly out of place is an even further insult. To use a comment by another person, it looks like a water tank that you'd hide away. Why is it that a monstrosity like this can even be considered next to such an iconic sandstone building? Unless the comments about the Metro being nothing but a property developer's railway are actually quite well founded.

Surely there are other buildings that could be either knocked down and rebuild of much, much less significance and visual impact, or another area of Sydney entirely where this could be considered? Or are you all just blinkered by the old green bills?

This is quite literally Ultimo 2.0

Date received: 29/01/2021

Name: Katia Falcop

Suburb: Bonnet Bay

Submission content:

Stop the fuglification of my city!

Date received: 29/01/2021

Name: Bronwyn Hannah

Suburb: Canterbury

Submission content:

I object to the construction of both high-rise towers at Central Station for three reasons. Firstly, from a heritage perspective, they will overwhelm the historic appearance of this very special place by their oversized scale. Secondly from a sustainability perspective, they represent a huge outlay of building materials and energy to create massive new commercial space that may be unnecessary and even uneconomic in the changed city conditions post-covid. Thirdly from a public interest perspective, they are being constructed on public land without clear compensation to the public purse, and thus appear to be another example of privatisation of public assets without a justifiable business case.

Date received: 29/01/2021

Name: Anonymous

Suburb: Maroubra

Submission content:

I strongly object to raising the height limit for Block C of the Western Gateway sub-precinct of the Central State Significant Precinct. This proposal is due to yet another 'Unsolicited Proposal' by a developer,(TOGA) who frankly only care about profits and nothing about loss of amenity, ambience and lifestyle for those living or visiting this area.

The proposal has troubling negative heritage implications for the State-heritage listed Central Station and its Clock Tower, as well as the former 1906 Inward Parcels building. It seems that the proposal also appears to only provide a 12-metre building separation from Atlassian's proposed tower complex application.

The Community and visitors need more essential green canopy and less Hi Rise Ugly, overpriced, ghetto buildings which reduce the sunlight and over shadow the whole area. This needs to be rejected as the City and Central is already over built and the traffic and noise is strangling our once beautiful City.

Date received: 29/01/2021

Name: Anonymous

Suburb: Sydney

Submission content:

I write as a very concerned citizen of Sydney and a heritage professional of 20 years.

I strongly object to the re-zoning proposal on the following grounds:

There is mention that community consultation shows 'support of this work' however this actually refers to the public desire to activate the precinct suitable to the character and heritage values, and not to build high rise development envisioned by this proposal.

Proposals for 200+ meter towers adjacent and above the state heritage listed Post Office and within the state significant precinct of Central is absurd and reckless.

Technical reports throughout relating to heritage, visual impact assessment etc refer to and assume adjacent Art Deco tower has been built and that further site erosion via Central Square is a 'done deal'. This is not how proposals are assessed under the EP&A Act, otherwise they should be assessed together to understand the full impact.

Visual impacts are extreme and pushes Sydney further into becoming an ugly dark soulless hole. The Urbis assessment of 'acceptable and manageable visual heritage impacts' are totally wrong in my professional opinion. The heritage assessment [REDACTED] I call for an independent peer review of their work.

If the vision is to be world class and internationally comparable with this proposal – unfortunately we will be a laughing stock. London, NYC, Paris even Melbourne wouldn't treat their state significant historic buildings and precincts in this way.

Western Gateway proposals have been fast tracked without a masterplan in place for the heritage precinct and bare no relation to heritage character, setting and values that make up the core reasons for its listing on the SHR.

Urbis [REDACTED] misrepresent heritage values and conservation policies in the Conservation Management Plan for Central Station (Government Architects Office, 2013) and the Parcel Office Conservation Management Plan (Department of Public Works & Services, 1997). They staggeringly advise that the tower proposal is consistent with Central CMP policies which absolutely not true. The parcels post is core to the state heritage listing of Central precinct. The CMP states that a masterplan must be developed prior to major development so that these very buildings can be conserved not destroyed.

The proposal is not consistent with Parcel Post CMP policies which state that (among other things): Alteration of the form or detail of the openings to the three main facades should not be permitted; New works must be reversible and be designed in such a manner

as to complement the neoclassical vocabulary used throughout the Sydney Terminal Complex; The external facades and roofs capes must be conserved with no new openings permitted etc.

Urbis has reassessed the parcel post building as 'local significant' which is, again, grossly erroneous [REDACTED] as per Burra Charter principles, Heritage Council guidelines, Central Station CMP and the SHR heritage listing. This building is 'core' to the state heritage precinct values and listing. I seriously question the rigour of heritage advice on this proposal and call for an independent peer review by ICOCOMOS.

Permitting lift cores and structural zones to be inserted through the Parcel's Post Office (along with new interfaces on the south and east facades) is vandalism and has no regard to the objects of Heritage Act or EP&A Act. This is now unfettered development to the max, a new low for Sydney that will prove to be a stinking hangover in years to come.

The Urbis Heritage Impact Assessment included some notes on the very poor condition of the exterior masonry façade and then offers recommendation of conservations works as 'mitigation' for impacts. What this actually demonstrates is that Adina is a poor manager of state owned heritage assets and their on-going tenancy should be questioned not rewarded.

Covid 19 has been an economic disruptor which has seen a shake-up in how we live, work and use our cities. Commercial and retail space across cities are at record high vacancy levels with major business failures across the board expected throughout 2021 and 2022. Recovery in this space, including tourism, is not expected for years. When a major proposal is put forward for a heritage site the 'justification and need' must be urgent and real. This proposal does not present a real long term economic need other than the short term boost a construction project brings. Empty new tower buildings on top of state heritage items will be the disgraceful result.

The re-zoning to lift height restrictions should, under no circumstances, be approved.

Yours faithfully

Date received: 29/01/2021

Name: Mayling Hargraves

Suburb: Mosman

Submission content:

Submission for proposed railway Square development 29Jan2021

I object to this proposal.

I don't think a sufficiently clear proposal has been submitted for people to make a positive decision.

As it is part of such a big site, I believe the Sydney authority which covers it should produce a plan for the whole area.

The proposal may tick all the Local Authority boxes and others, but fails to show what is proposed visually, fails to show pictures of what is to be destroyed.

On page 69 of 121 there are shown other tall buildings, proposed?

And on page 70 also other tall buildings, proposed?

The developer may want to rethink his proposal, after the pandemic.

What's the point of building a multi storey office block where people have to face away from windows with views, because they cannot see their PC screens against the windows.

It seems that office workers probably only need to go to an office 2 days a week.

A working life is c. 50yrs, ie 20-70, rearing 2 children at home is c. 14 yrs assuming the children can get themselves to and from school once at secondary school.

Build towers (if you want) where people would like to live.

Regards

M M Hargreaves

Western Gateway Sub-precinct Block C

Submissions



Date received: 29/01/2021

Name: Judith Lawson

Suburb: Cooranbong

Submission content:

This proposed rezoning is a blight on our Central Station and historic buildings in its surround. Why must every part of the city accept high rise buildings and many particularly ugly in my view. Our historic buildings and their surround need a welcoming feel as other countries make the effort to do. Its time our state government consult and listen to their constituents. One need only read the book GAME OF MATES to understand what is happening here!

Date received: 29/01/2021

Name: Anonymous

Suburb: Chippendale

Submission content:

No content

Date received: 29/01/2021

Name: Jamie Parker MP

Suburb: Balmain

Submission content:

See attachment

Date received: 29/01/2021

Name: David Burdon on behalf of the National Trust

Suburb: Sydney

Submission content:

See attached.

Date received: 29/01/2021

Name: Alexis Cella on behalf of University of Technology Sydney

Suburb: Sydney

Submission content:

See attached.

Date received: 28/01/2021

Name: NSW Environment Protection Authority (EPA)

Suburb: Sydney

Submission content:

See attached.

Date received: 5/02/2021

Name: Frasers Property and Dexus Funds Management Limited

Suburb: Sydney

Submission content:

See attached.

Date received: 5/02/2021

Name: The City of Sydney

Suburb: Sydney

Submission content:

See attached.

Date received: 11/02/2021

Name: Heritage NSW

Suburb: Parramatta

Submission content:

See attached.



Action for Public Transport (N.S.W.) Inc.

P O Box K606
Haymarket NSW 1240
29 January 2021

Director, Transport Assessments
Planning and Assessment
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124
Submitted via website

Central Precinct SSP

Western Gateway Block C re-zoning

WHO WE ARE

Action for Public Transport (NSW) Inc. ("APTNSW") is a transport advocacy group active in Sydney since 1974. We promote the interests of beneficiaries of public transport - passengers and the wider community alike.

THE RE-ZONING

- Generally, planning policies such as this should state what assumptions are being made about COVID-19 and should indicate probable effects if those assumptions are inaccurate. We suggest that a section should be added somewhere addressing possible ramifications of the current pandemic that might affect the Precinct. For example, what happens if work-from-home remains as common as it was in 2020?
- It is well-known that the Devonshire St pedestrian tunnel is well patronised, so much so that authorities are reluctant to add to its load at peak periods. That is one reason why the new Sydney Metro platforms being constructed below Central platforms 13 and 14 are not to be connected to the Devonshire St tunnel nor to the Chalmers St concourse. Instead, Central Walk is being constructed to connect the metro platforms to a point in Chalmers St near the tram stop.

Several submissions to Modification 2 of the Chatswood-Sydenham Metro raised the question of extending Central Walk westwards in the context of reducing walking distances between Railway Square and trains. The submissions report discusses those submissions in Chapter 6. The report is available now at <https://majorprojects.accelo.com/public/f3d3d103306c8b426eea1de2ea521106/2017-10-04%20Central%20Walk%20Modification%20Submissions%20Report.pdf>; it may be moved to the Major Projects website later.

A copy of the relevant pages is being submitted with this letter.

The submissions report acknowledges the capacity problems of the Devonshire St tunnel and generally agrees that the proper solution would be to extend Central Walk westwards. Unfortunately, construction of Central Walk West cannot start until platforms 13 and 14 are back in service, currently expected to be late 2022.

We think it would be a mistake to allow further development around the western gateway until there is rail capacity (i.e., the Chatswood-Sydenham metro) and pedestrian capacity to handle the extra people who will use the western gateway area. We suggest that the re-zoning proposal should therefore not proceed immediately unless a reservation can be incorporated into it to ensure that Block C redevelopment cannot open until the Metro is running and adequate capacity exists for pedestrian traffic. Ideally the extra pedestrian capacity would also serve to shorten walking distances for some trips.

Jim Donovan
Secretary
Action for Public Transport (NSW) Inc.

CHATSWOOD TO SYDENHAM
**CENTRAL WALK
MODIFICATION
SUBMISSIONS REPORT**

6 Community submissions

6.1 Andrew Scott

Issue raised

Consider the need for an undercover secure bike storage area at Central Station, similar to ones currently being implemented across other stations in Sydney.

The small amount of outdoor bike racks are insufficient to meet the current demand, and are subject to bike theft and weather. Secure, high capacity bike storage at major trains stations mean that commuting cyclists that use the train can leave the bike at a station rather than bring it on a train with them.

Bike storage is cheap and easy to implement, and can provide for many more people than the equivalent number of car spaces.

Response

Transport for NSW is currently investigating opportunities to provide additional cycle parking at Central Station. As identified in Section 6.4 of the modification report, cycle parking would be provided within 50 metres of the station entries where feasible.

6.2 Julian Foster

Issue raised

The overall concept of Central Walk is excellent. However, it should be extended to go all the way through the station to connect to the Broadway side as well. It is obvious that is needed and adding it in the future will only be more expensive. Platforms 1-12 have a fair bit of spare capacity at the moment so, even if the extended tunnel couldn't be mined and had to be done as cut-and-cover, taking some of those platforms out of service periodically as the tunnel progressed wouldn't affect operations.

Users from the Broadway side accessing the suburban platforms currently have to walk all the way through Devonshire Street Tunnel (which is often very crowded and only going to get worse) or the Grand Concourse. If in future they are accessing the Sydney Metro platforms they will either still have to use the Devonshire Street Tunnel then come half way back through Central Walk - or walk above ground through the Grand concourse and then down to the Sydney Platforms.

Another possibility might be to at least add a link from the Devonshire Street Tunnel down to the southern end of the Sydney Metro platforms.

Response

As identified in the modification report, the design and delivery of Central Walk would allow for a new western entry through the extension of the underground concourse to the west of the metro platforms.

Construction of the extension of the underground concourse to the west of the metro platforms would likely involve cut-and-cover construction, and would be completed in coordination with the renovation of Central Station as part of the Central Precinct Renewal Project. To maintain intercity and regional rail services at Central Station, the construction of a west concourse and western entry cannot commence until platforms 13 and 14 have been reinstated as part of the approved Sydney Metro works. As such, these works are suited to being progressed as a separate project in the future. This would also allow additional time to identify the optimal solution for the west concourse and western entry and proposed pedestrian connections to ensure integration with the surrounding precinct and plans for its revitalisation.

An option of connecting the future metro concourse to the Devonshire Street Tunnel was considered (refer to Section 3.2.3 of the modification report). Although this would provide improved access for customers to and from the west, it would not meet the long term demands of the station.

A future extension of the concourse to the west and a new western entry would better meet the long term demands of the station by providing a wider concourse, a new western entry, a new east-west connection, and interchange opportunities to all above ground platforms.

6.3 Geoff Thiel

Issue raised

Suggest that Central Walk should include a tunnel under Elizabeth Street, with an entry / exit point at Centennial Plaza. During peak hours, there are too many pedestrians queuing in front of Woolworths, with pedestrians sometimes being forced onto the street. A station access point at Centennial Plaza would mean people coming and going from north east Surry Hills could access the tunnel.

Response

Broader pedestrian improvements (beyond the proposed eastern entry) to the precinct to the east of Central Station is not within the scope of this project and is being investigated separately as part of the wider Central Station precinct renewal. The design of the eastern entry allows for a future connection through to Randle Lane and / or Elizabeth Street.

6.4 Roisin Kelly

Issue raised

The eastern entrance proposed at 20-28 Chalmers Street should open onto Randle Lane at the rear of the site as well as Chalmers Street to provide easy access to the area south-east of Central Station.

Response

Randle Lane is currently used for back of house access to properties fronting Chalmers Street, Randle Street and Elizabeth Street. The lane has narrow footpaths and is not currently conducive to supporting pedestrian flows in and out of a station entry.

Notwithstanding, the design of the eastern entry safeguards a future connection of the entry to Randle Lane should this become viable based on future developments or the wider Central Station precinct planning.

6.5 10,000 Friends of Greater Sydney

Issue raised

10,000 Friends of Greater Sydney generally support the proposal. However, there is a need for the new pedestrian walkway to connect to destinations on the western side of Central Station, especially to the major tertiary institutions and the existing bus interchange.

It will also be important to provide clear signage for users to capture the accessibility benefits of the proposal.

Response

As identified in the modification report, the design and delivery of Central Walk would allow for a new western entry through the extension of the underground concourse to the west of the metro platforms.

Construction of the extension of the underground concourse to the west of the metro platforms would likely involve cut-and-cover construction, and would be completed in coordination with the renovation of Central Station as part of the Central Precinct Renewal Project. To maintain intercity and regional rail services at Central Station, the construction of a west concourse and western entry cannot commence until platforms 13 and 14 have been reinstated as part of the approved Sydney Metro works. As such, these works are suited to being progressed as a separate project in the future. This would also allow additional time to identify the optimal solution for the west concourse and western entry and proposed pedestrian connections to ensure integration with the surrounding precinct and plans for its revitalisation.

A future extension of the concourse to the west and a new western entry would better meet the long term demands of the station by providing a wider concourse, a new western entry, a new east-west connection, and interchange opportunities to all above ground platforms.

Effective wayfinding and signage is a critical component of Sydney Metro. Requirements for wayfinding are identified in the Sydney Metro City & Southwest Design Guidelines. The latest version of this document was provided as Appendix B of the modification report and can be found at www.sydneymetro.info.

6.6 Anonymous 1

Issue raised

It is disappointing that this plan will do nothing to alleviate the existing peak hour crowding in the Devonshire Street Tunnel. Indeed, it will probably make crowding worse. This walkway is usually at, and often over, safe capacity during peak hours. There are often examples of ‘pedestrian rage’ and many encounters which could easily head that way. The tunnel is a prime target for people who want to cause trouble.

Response

Operational pedestrian modelling of customer movements was carried out as part of the modification report (refer to Section 10.3.1 of the modification report). This modelling shows that the level of service along the majority of the Devonshire Street Tunnel would not change as a result of the proposed modification. There may be some locations, particularly at the western extent of Devonshire Street Tunnel, which may experience some deterioration in level of service, however this would remain at generally acceptable levels.

As identified in the modification report, the design and delivery of Central Walk would allow for a new western entry through the extension of the underground concourse to the west of the metro platforms. A future west concourse and western entry would alleviate pedestrian congestion and crowding within Devonshire Street Tunnel.

Construction of the extension of the underground concourse to the west of the metro platforms would likely involve cut-and-cover construction, and would be completed in coordination with the renovation of Central Station as part of the Central Precinct Renewal Project. To maintain intercity and regional rail services at Central Station, the construction of a west concourse and western entry cannot commence until platforms 13 and 14 have been reinstated as part of the approved Sydney Metro works. As such, these works are suited to being progressed as a separate project in the future. This would also allow additional time to identify the optimal solution for the west concourse and western entry and proposed pedestrian connections to ensure integration with the surrounding precinct and plans for its revitalisation.

6.7 Anonymous 2

Issue raised

The proposed modification of the approved Sydney Metro project to include a new eastern concourse and entry on Chalmers Street is supported.

As depicted in Figure 2-2 of the modification report, the existing concourse for the Eastern Suburbs railway, as constructed in the 1970s, provides the only north to south accessible flow between Central Station's other concourses, and from the Devonshire Street Tunnel.

This degree of connectivity is not being replicated with the new north to south Sydney Metro concourse indicated in the approved project – namely, there is no reference to a southern entry and exit from the Sydney Metro concourse.

It is appreciated that some 'back of house' infrastructure may be required in association with the concourse level of Sydney Metro. However, it remains a substantial missed opportunity not to contemplate a ticketed entry into the Sydney Metro concourse from the Devonshire Street Tunnel. This would reduce the interchange distance for pedestrians from the Railway Square bus interchange by around 200-250 metres.

Response

An option of connecting the future metro concourse to the Devonshire Street Tunnel was considered (refer to Section 3.2.3 of the modification report). Although this would provide improved access for customers to and from the west, it would not meet the long term demands of the station.

As identified in the modification report, the design and delivery of Central Walk would allow for a new western entry through the extension of the underground concourse to the west of the metro platforms.

Construction of the extension of the underground concourse to the west of the metro platforms would likely involve cut-and-cover construction, and would be completed in coordination with the renovation of Central Station as part of the Central Precinct Renewal Project. To maintain intercity and regional rail services at Central Station, the construction of a west concourse and western entry cannot commence until platforms 13 and 14 have been reinstated as part of the approved Sydney Metro works. As such, these works are suited to being progressed as a separate project in the future. This would also allow additional time to identify the optimal solution for the west concourse and western entry and proposed pedestrian connections to ensure integration with the surrounding precinct and plans for its revitalisation.

A future extension of the concourse to the west and a new western entry would better meet the long term demands of the station by providing a wider concourse, a new western entry, a new east-west connection, and interchange opportunities to all above ground platforms. Any future west concourse and western entry would be fully accessible.

6.8 Ian Hill

Issue raised

This project places the metro platforms in the wrong location. The metro platforms should be located east of the current Central Station platforms 16 to 24. This would:

- Preserve the heritage status of Sydney Terminal consistent with the objective to ‘accentuate Central Station as a grand heritage asset’
- Allow for future expansion of terminating trains at Central Station such as for high speed rail links
- Reduce the congestion at Central Station caused by placing the Sydney Metro platforms inconveniently under platforms 12, 13, 14 and 15, and introducing the associated vertical transport (lifts and escalators).

Public transport use is increasing by 68 per cent on weekends as well as increases yearly for commuter work requirements and general travel. The need for more terminating platforms at Central Station will arise quite quickly in the coming decade requiring a more terminals and maximum space.

By placing the Sydney Metro platforms to the east of Central Station platforms 16 to 24 would help achieve the objectives stated on Page 23 of the modification report as follows:

1. Provide an intuitive and easy to use station environment for customers – the new platforms would be intuitive and easy to access from the east
2. Accentuate Central Station as a grand heritage asset – the heritage nature of the building would be preserved and there would be no damage during any construction phase for the new railway
3. Re-establish Central as an iconic destination within an expanded CBD footprint – Central Station is already one of the leading iconic buildings in Sydney and has been since construction and its opening on 4 August 1906. Placing the new railway to the east would expand its footprint.
4. Develop a highly functional multi-modal transport interchange that accommodates long-term demand – this proposal would make the interchange faster without having to build a further tunnel system under Central Station. The more tunnels the greater the threat of terrorism and loss of safety with underground evacuation and rescue
5. Improve accessibility, permeability and connectivity within and across the station precinct – by placing the new platforms east of platforms 16 to 24 it would be easier to exit the station and congestion would be reduced. This could be achieved by widening the existing northern pedestrian tunnel system.

The Executive Summary also states that the proposed modification would primarily support the objectives regarding the efficient operation of the station, but despite this, a number of adverse environmental impacts would remain including direct and indirect impacts to the State heritage listed Sydney Terminal and Central Railway Station group, and demolition of the locally listed Bounce Hostel (former MGM) building. Building the new platforms east of platforms 16 to 24 would remove this impact.

This suggestion would be quite cost effective saving excessive tunnelling under platforms 16 to 24. It would also save the cost of moving the platforms 1 to further out in to Sydney Yard.

Any further intensification of suburban traffic in or around the terminating platforms of Central Station platforms 1 to 15 is opposed.

Response

The location of the Sydney Metro platforms at Central Station forms part of the approved project and is not within the scope of this proposed modification.

Options for and the justification of the location of the Sydney Metro platforms at Central Station was provided in Section 4.8.2 of the Sydney Metro City & Southwest Chatswood to Sydenham Environmental Impact Statement. This included consideration of the option of constructing the metro platforms to the east of the existing station. A summary is provided below.

The introduction of underground metro platforms at Central Station would have material impacts to the station irrespective of the option chosen. Decision-making on the placement of the underground metro platforms seeks to balance the substantial benefits with the recognised constraints and challenges associated with its introduction.

Options to locate the metro platforms on the eastern side of Central Station did not maximise the efficiency of interchange for customers between metro and suburban and intercity rail and other transport modes. Other concerns related to potential property impacts, heritage impacts and the required depth of the new platforms, which would affect the quality of the transport experience for customers.

The proposed location for the new underground platforms below platforms 13 to 15 at Central Station has been selected for the following key reasons:

- It provides the most efficient interchange for customers between suburban and intercity platforms (and associated travel time benefits)
- The interchange and travel time benefits result in customer preference for interchange at Central Station rather than at Wynyard or Town Hall stations, providing congestion relief at these stations
- It best encourages the use of Sydney Metro as a service, resulting in a reduction in the use of crowded Central Station suburban platforms such as platforms 16 and 17
- It allows for an efficient construction method (shallow cut-and-cover arrangement) that minimises construction duration and disruption to customers using Central Station.

6.9 YHA Australia

Issue raised

YHA has two properties located directly adjacent to Central Station, being the Sydney Central YHA located at 11 Rawson Place, and the Railway Square YHA located at 8-10 Lee Street. Both properties are popular year round hosting local, interstate and international travellers in budget accommodation.

YHA requests that no demolition works, underground excavation or above ground new construction or related works that impact on YHA guests be permitted after 9pm and before 9am seven days per week.

Response

The proposed construction hours for each element of the proposed modification is provided in Section 7.8.9 of the modification report. The majority of construction work would be carried out during the standard daytime construction hours (7am to 6pm Monday to Friday, 8am to 1 pm Saturday and no work on Sundays or public holidays).

However, substantial construction activities would need to be carried out outside these hours to maintain safety of the public, construction and rail workers, to protect rail assets and to minimise disruptions to the transport network. In particular, any activities requiring rail possessions or that require possession of areas within Central Station would be carried out up to 24 hours per day and seven days per week.

The potential noise impacts of these works are assessed in Chapter 11 of the modification report. In relation to the two YHA properties, the following impacts are predicted during activities outside standard daytime construction hours:

- At the Sydney Central YHA, exceedances of up to 10 dB of the noise management level during enabling works, excavation works and construction works
- At the Railway Square YHA, exceedances of between 10 and 20 dB of the noise management level during enabling works, excavation works and construction works.

These potential impacts would be further refined as part of the Construction Noise and Vibration Impact Statements that are required to be prepared in accordance with Condition E33, as the details of the construction methods are developed. Any potential impacts would be managed through implementation of site-specific mitigation measures identified through consultation with affected sensitive receivers, the Construction Noise and Vibration Strategy and the conditions of approval.

6.10 Eagle Partners

Issue raised

Transport for NSW's Design Guidelines for Sydney Metro require that station designs 'optimise timeliness' and 'reflect pedestrian desire lines'.

Earlier public documents released by Sydney Metro confirmed the need to reduce door-to-door travel times, and not just the on-train travel times. Chapter 6 of the Central Walk Modification Report continues to refer to improving accessibility and connectivity. However, it only promises that 'provision' has been made for extending Central Walk to the west, or to the Pitt Street end of the station at some indeterminate future date.

The report records that, of customers leaving the station in the morning peak, 36 per cent exit to the west. This figure is higher than that for any of the other station exits.

The report's analysis of expected pedestrian movements in the underground passages is noted (Chapter 10). However, that analysis focuses on coping with anticipated congestion. It does not consider minimising passenger walk-up times, or pedestrian desire lines.

If this proposed modification is approved as is, pedestrians from the west of the station must continue to access the station via the northern concourse or the eastern concourse. Both routes are circuitous and therefore time-consuming.

There are at least four major tertiary institutions immediately to the west of Central Station which generate large numbers of public transport trips. There is also a large bus interchange at Railway Square. These significant generators of train and Sydney Metro passengers deserve infrastructure which will minimise walk-up times.

Pedestrian access between the southern end of the Sydney Metro concourse and Railway Square must therefore be improved. One option would be a 150 metre long pedestrian tunnel between the southern end of the Sydney Metro concourse and Henry Deane Plaza. Given the density of current pedestrian flows to and from the west and south-west of the station, and the likelihood that those numbers will increase markedly over time, such a pedestrian tunnel can be justified on cost-benefit grounds and should be in place for the commencement of Sydney Metro services.

It should be a condition of any approval of this application that direct pedestrian access be provided between the Sydney Metro concourse and Henry Deane Plaza.

Response

As identified in the modification report, the design and delivery of Central Walk would allow for a new western entry through the extension of the underground concourse to the west of the metro platforms.

A future extension of the concourse to the west and a new western entry would better meet the long term demands of the station by providing a wider concourse, a new western entry, a new east-west connection, and interchange opportunities to all above ground platforms.

Construction of the extension of the underground concourse to the west of the metro platforms would likely involve cut-and-cover construction, and would be completed in coordination with the renovation of Central Station as part of the Central Precinct Renewal Project. To maintain intercity and regional rail services at Central Station, the construction of a west concourse and western entry cannot commence until platforms 13 and 14 have been reinstated as part of the approved Sydney Metro works. As such, these works are suited to being progressed as a separate project in the future. This would also allow additional time to identify the optimal solution for the west concourse and western entry and proposed pedestrian connections to ensure integration with the surrounding precinct and plans for its revitalisation.

Issue raised

Sydney Metro's 'Central Walk' brochure dated June 2017 states that 'State-of-the-art technology will keep customers connected at all stages of their journey, from smart phone travel apps, to real-time journey information at metro stations and on-board trains'. Incorporation of modern technology is understood and commended, but it should not be at the expense of making life more difficult for those passengers not immediately equipped to take advantage of it.

There is a need for a satisfactory level of 'low-tech', or paper-based Sydney Metro information, required by those in the community who may not have access to hand-held electronic devices.

The Legislative Assembly Committee on Community Services, in its December 2016 Report, said, in Recommendation No. 11, 'That Transport for NSW publish travel information in paper format. It should be in locations where it is easily available to people who do not have access to online information, such as community centres and doctors' surgeries in rural and regional areas.'

The NSW Government, in its response dated April 2017, supported the Committee's recommendations. It is expected that Transport for NSW and Sydney Metro will comply with government policy. Such compliance should be a condition of any approval of this application.

Response

The proposed use of modern technology to provide customer information as part of Sydney Metro will not be at the expense of other forms of customer information. Other forms of information, similar to those currently available for Sydney Trains services would also be available for Sydney Metro, noting that Sydney Metro would provide a turn-up-and-go service without the need for timetables.

Effective wayfinding and signage is a critical component of Sydney Metro. Requirements for wayfinding are identified in the Sydney Metro City & Southwest Design Guidelines. The latest version of this document was provided as Appendix B of the modification report and can be found at www.sydneymetro.info.

Issue raised

At an appropriate time, the ‘Sydney Metro’ branding for this project should cease. So far as the travelling public is concerned, this new railway is just that – a new railway. Retaining the Sydney Metro brand is unnecessary. It will be confusing for the thousands of travellers who will use Sydney’s railway network over the coming years and will complicate the provision of wayfinding and service information. The potential for this confusion is already illustrated by the unnecessarily complex destination signage depicted in the artist’s impressions of Central Walk in the public promotional material. Also, the artist’s impressions in the Central Walk brochure dated June 2017 clearly show Sydney Metro Northwest as part of the Sydney Trains network, which it is not.

Sydney Metro’s ticketing and fares are to be integrated with the other modes of public transport in Sydney; specifically, Sydney Trains. The new railway’s service information, wayfinding, stations and platforms should be similarly integrated. In particular, the Sydney Metro platforms at Central Station should be numbered sequentially to reflect their physical location, and to conform with the platform numbers already in existence at Central, even if some existing platforms would need to be re-numbered. It would help in wayfinding.

Response

The Sydney Metro network is being progressed as a differentiated service to the Sydney Trains network. The reasons for and justification of this decision are summarised in Chapter 4 of the Sydney Metro City & Southwest Chatswood to Sydenham Environmental Impact Statement and in *Sydney’s Rail Future*. The Sydney Metro branding is an important component of this service differentiation.

Notwithstanding, the Sydney Metro network will include interchange capability with the existing Sydney Trains network at strategic locations. This includes Martin Place and Central stations. Interchange would also be available at Epping, Chatswood and Sydenham stations as part of other stages of Sydney Metro.

Effective wayfinding and signage is a critical component of Sydney Metro. Requirements for wayfinding are identified in the Sydney Metro City & Southwest Design Guidelines. The latest version of this document was provided as Appendix B of the modification report and can be found at www.sydneymetro.info. This will provide clear information to customers.

Issue raised

In November 2016 the government announced plans for Sydney Metro West, to be operational some time after 2025. There has been no public announcement as to whether, or where, the two metro lines will intersect. On the assumption that they will intersect, it is important to minimise overall travel times for passengers by minimising transfer times between the two lines. One obvious point of intersection to be considered would be Central Station.

Whilst it is too late for Sydney Metro West to be considered under this Application to modify the approval, the Department of Planning and Environment (or other body) should promptly initiate measures to arrange for the Sydney Metro platforms at Central Station, as currently planned, to be reconfigured into a ‘stacked’ arrangement, one above the other, to leave open the option of having the two Sydney Metro West platforms arranged alongside, for ‘across-the-platform, same-direction’ interchange between the two Sydney Metro lines.

It should be a condition of any approval for this application that a cost / benefit analysis of the reconfigured Sydney Metro platforms at Central Station be investigated.

Response

Early planning work has begun on Sydney Metro West with key precincts to be serviced identified as Parramatta, Sydney Olympic Park, the Bays Precinct and Sydney CBD. The location of a station in the Sydney CBD is currently under investigation.

The Sydney Metro City & Southwest Chatswood to Sydenham Submissions and Preferred Infrastructure Report provided information on how future extensions could be built. This identified that the Sydney Metro network could be extended by:

Direct connections to the tunnels proposed as part of this project. This approach could result in disruption to the metro network during construction, and would need to be considered at the time of any proposed extension. This approach would, however, provide flexibility in determining how and where the network should be extended

Separate independent metro alignments that provide connectivity through strategic interchange points.

These connection options would be considered during the design of Sydney Metro West to provide appropriate and efficient interchange between the metro lines.

6.11 Action for Public Transport NSW

Issue raised

Action for Public Transport NSW is concerned that proper attention has not been given to the thousands of people who use the Devonshire Street Tunnel daily. The modification report provides a discussion regarding the option of connecting to the Devonshire Street Tunnel. This section concludes that due to technical complexities of tunnel widening and the limited customer benefits, this option has not been progressed.

If the tunnel cannot be widened it should be duplicated. This could be done either to the south with a completely new tunnel about 220 metres long or to the north by extending paid area tunnels about 60 metres to Ambulance Avenue. The work should be included in the Sydney Metro Chatswood to Sydenham project and is justified by the expected increase in passenger numbers when Sydney Metro is operational. The work should be arranged so that at least one tunnel between Chalmers Street and Henry Deane Plaza is open at all times. Importantly, the southern end of the Sydney Metro platforms should have direct access to the paid area tunnel under platform 14.

Response

As identified in the modification report, the design and delivery of Central Walk would allow for a new western entry through the extension of the underground concourse to the west of the metro platforms.

Construction of the extension of the underground concourse to the west of the metro platforms would likely involve cut-and-cover construction, and would be completed in coordination with the renovation of Central Station as part of the Central Precinct Renewal Project. To maintain intercity and regional rail services at Central Station, the construction of a west concourse and western entry cannot commence until platforms 13 and 14 have been reinstated as part of the approved Sydney Metro works. As such, these works are suited to being progressed as a separate project in the future. This would also allow additional time to identify the optimal solution for the west concourse and western entry and proposed pedestrian connections to ensure integration with the surrounding precinct and plans for its revitalisation.

An option of connecting the future metro concourse to the Devonshire Street Tunnel was considered (refer to Section 3.2.3 of the modification report). Although this would provide improved access for customers to and from the west, it would not meet the long term demands of the station. Additionally, duplication of the Devonshire Street Tunnel would face similar challenges to tunnel widening (the impacts of which are discussed in Section 3.2 of the modification report).

A future extension of the concourse to the west and a new western entry would better meet the long term demands of the station (including relieving congestion in Devonshire Street Tunnel) by providing a wider concourse, a new western entry, a new east-west connection, and interchange opportunities to all above ground platforms.

6.12 Alex Greenwich MP

Issue raised

Constituents are concerned that the proposed Central Walk does not improve access to the southern end of the train platforms through to Devonshire Street and Railway Square. A significant portion of passengers using both current train services and future Sydney Metro services will use this access and it should be included in the current project rather than being left to possible future proposals.

Response

As identified in the modification report, the design and delivery of Central Walk would allow for a new western entry through the extension of the underground concourse to the west of the metro platforms.

Construction of the extension of the underground concourse to the west of the metro platforms would likely involve cut-and-cover construction, and would be completed in coordination with the renovation of Central Station as part of the Central Precinct Renewal Project. To maintain intercity and regional rail services at Central Station, the construction of a west concourse and western entry cannot commence until platforms 13 and 14 have been reinstated as part of the approved Sydney Metro works. As such, these works are suited to being progressed as a separate project in the future. This would also allow additional time to identify the optimal solution for the west concourse and western entry and proposed pedestrian connections to ensure integration with the surrounding precinct and plans for its revitalisation.

8 February 2021

Our Ref: 2021/037075

File No: S064204.022

Brett Whitworth
Deputy Secretary Greater Sydney, Place and Infrastructure
NSW Department of Planning, Industry and Environment
12 Darcy Street
Parramatta NSW 2150

Attention: Aaron Nangle
Aaron.Nangle@planning.nsw.gov.au

Dear Aaron

City of Sydney submission on the Draft Central Western Gateway Block Rezoning Proposal

The City of Sydney welcomes the opportunity to provide a submission on the Department of Planning, Industry and Environment's proposed rezoning of the Central Station Western Gateway Block C.

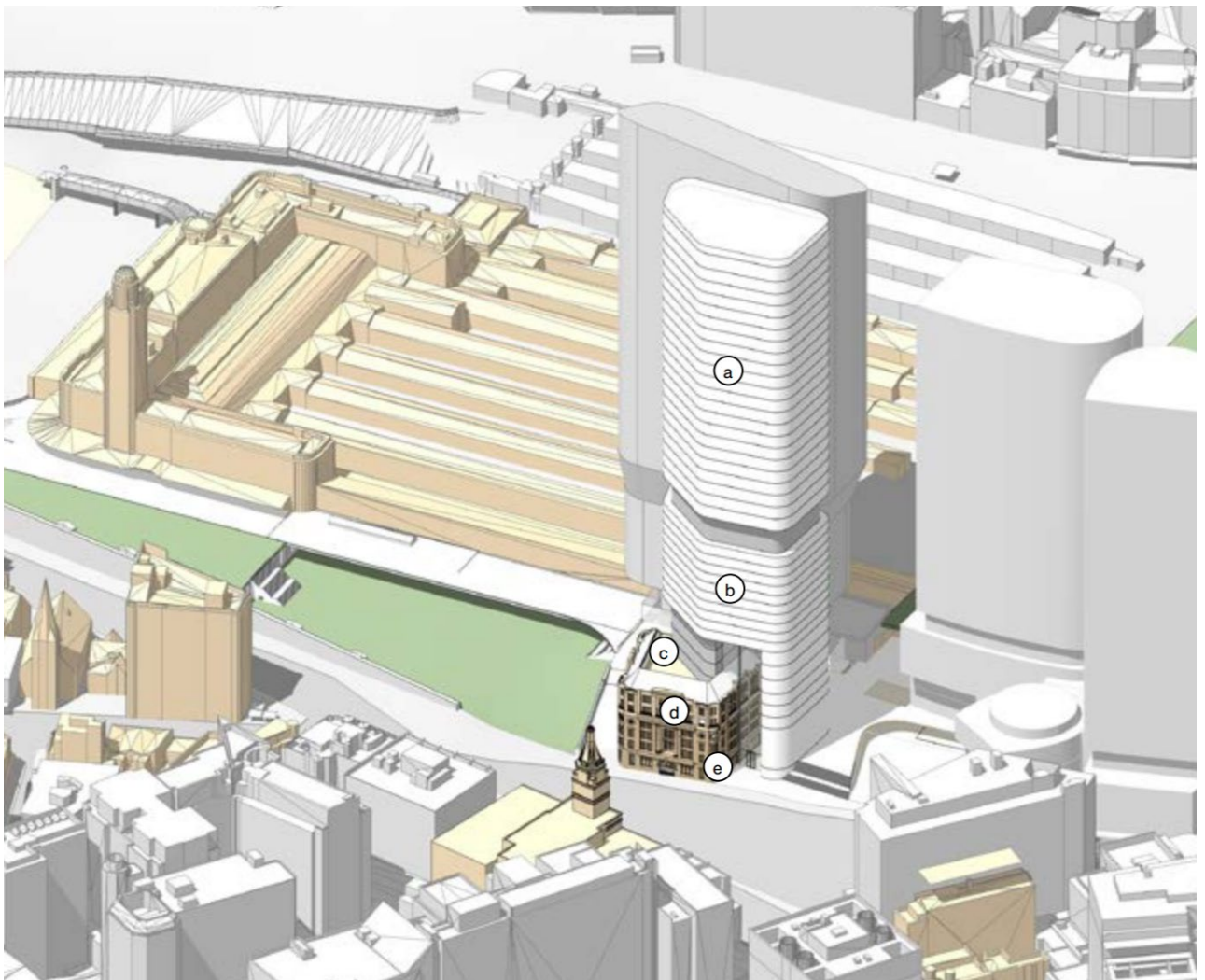
Should you wish to speak with a council officer about the above, please contact Jesse McNicoll, Urban Design Coordinator on 9265 9098 or at jmnicoll@cityofsydney.nsw.gov.au

Yours sincerely,



Graham Jahn AM LFRAIA Hon FPIA
Director
City Planning | Development | Transport

Submission on Draft Central Western Gateway Block C Rezoning Proposal



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Introduction

The City of Sydney welcomes the opportunity to provide a submission on the Department of Planning, Industry and Environment's proposed rezoning of the Central Station Western Gateway Block C.

At the outset, the City of Sydney **does not regard the State Heritage listed former Parcel Post building site as a suitable development site for a tower** due to its heritage status and due to its proximity to future critical open space.

Regardless, **the proposed design approach must cantilever high above and separated from the existing building without infill or support structure passing through the heritage building.**

The City raises significant concerns with the proposed rezoning as per the exhibited documents and has structured this submission by identifying the following key issues:

1. Heritage
2. Designing with Country
3. Open space
4. Pedestrian movement
5. Microclimate
6. ESD
7. Transport

Each section includes a series of recommendations to be considered.

It is noted that this development forms part of the Western Gateway sub-precinct as identified in the Central Station State Significant Precinct boundary (SSP). The Western Gateway includes three private development sites, each with a proposed tower development. The site is adjacent to the future proposed Over Station Development (OSD), and the proposed new Central Square, Sydney's 'Third Square'. The proposed location of the tower is particularly sensitive given its inclusion within the *Sydney Terminal and Central Railway Stations Group* listed on the State Heritage Register, general proximity to the main terminal building (including the clock tower) and the former Parcel Post building.

The assessment of this proposal cannot be undertaken without a comprehensive analysis of the proposed tower in relation to its context. For a sub-precinct of this scale, this level of contextual work should have informed the Design Guide for the sub-precinct. The Design Guide should set the benchmarking performance targets for amenity for the sub-precinct from which to assess each individual development proposal.

The City notes that the Design Guide has not been updated in response to the submissions raised when it was exhibited with the Western Gateway Blocks A and B. The City's previous comments on the Design Guide stand. This document must be publicly released to guide the heritage response (European and Aboriginal), open space, pedestrian movement, microclimate response (wind, solar), environmental and sustainability impacts and general transport response.

Recommendations

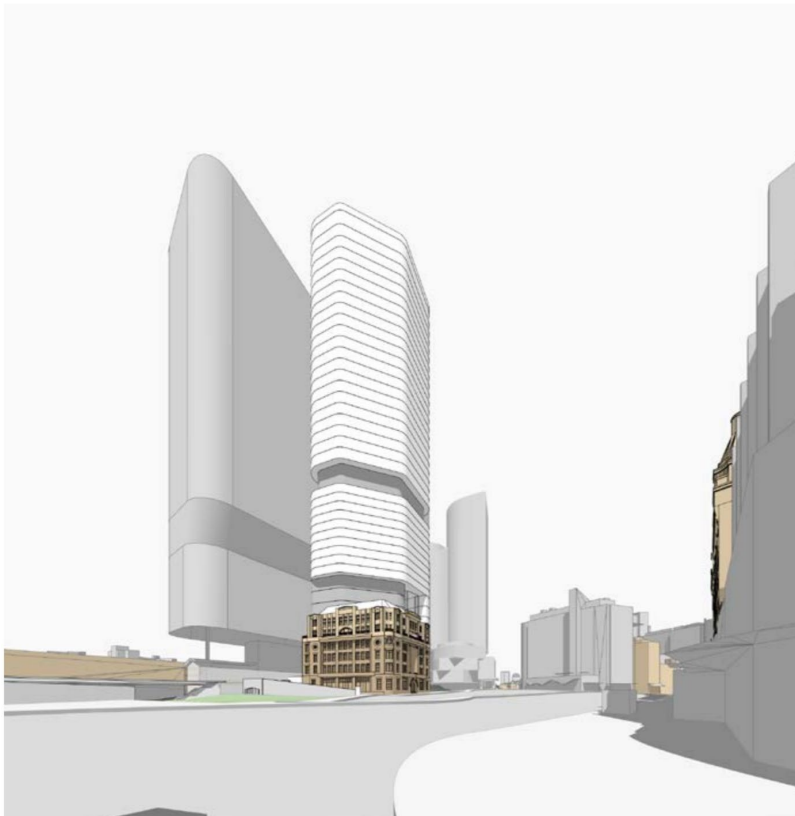
- 1. Update and publicly release the Western Gateway Design Guide based on the feedback given when previously exhibited with measurable criteria, the heritage response (European and Aboriginal), open space, pedestrian movement, microclimate response (wind, solar), environmental and sustainability impacts and general transport response.**

Heritage

The proposed tower sits partially over the State Heritage listed former Parcel Post building (fPPb). The City is concerned about a lack of appropriate consultation with the NSW Heritage Council, the lack of an independent Conservation Management Plan (CMP) and the general impact of the proposed tower on the State Heritage items within and adjacent to the Western Gateway sub-precinct, and specifically on the conservation of the fPPb and its appropriate curtilage.

These issues are detailed below:

- No summary of appropriate and meaningful consultation with the Heritage Council is provided in the documentation. The City sees this as essential to guide the process to achieve a holistic outcome for heritage that can celebrate the important heritage of this precinct.
- The site-specific CMP and visual assessment written for each site separately and issued concurrently with DA documentation will not provide an independent assessment in relation to the holistic heritage setting. The City recommends adopting one of the two independently written CMPs (one by the Government Architect's Office and one by TZG for TfNSW). This is essential for development of the site to be considered appropriately.
- The CMP seems to be tailored for a future development that anticipates a tower to be built or partially built on the former Parcel Post building. One part of the CMP seems adequate to guide the conservation of the item, another part seems specifically written to justify a future tower development.
- The current Heritage Impact Statement (HIS) does not assess any proposed form or envelope, structural intervention or views and vistas to and from the building. Consequently, the HIS is too general and lacks specific detail.
- The reference design shows the zone between the fPPb and the base of the tower as enclosed. This does not result in appropriate curtilage to the heritage building (see below).



/ George Street from North Design competition winning scheme massing shown for Block A and Block B

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- The Structural Viability Report (SVR) comments on a tower that partially penetrates the fPPb. This is not a study to evaluate a possible additional envelope but seems to analyse and establish the future development itself. It does not explore and assess possibilities and/or general proposals and fails to justify the proposed alteration.

The following specific comments are provided:

- Policy 25 of the CMP does not allow for any development to the facades unless to reinstate original details. The proposal is to largely demolish the eastern facade to connect the new tower.
- Justification is sought with Policy 28, pointing to the reconstruction of this facade. This is unsatisfactory, as the facade should be retained and conserved in its entirety not altered with a large demolition and obscuration.
- Policy 31 also recommends the retention and restoration of all facades. The HIS argues that this proposal is only for a general envelope and not physical works. As development with the proposed envelope will result in physical works that demolish eastern facade, the proposal is inconsistent with the policy.
- Policy 55 intends to retain and strengthen existing columns and warns of structural damage with any removal. The proposal seems to have a substantial intervention on existing structure with enormous consequences. The HIS does not justify this intervention with any real argument. The current structure of the fPPb has no issues and it should not be modified or allow any structural intrusions.
- Policy 67 explores the possibility of cantilevered structure or addition on top of the existing building relying on the current structure and large separation. The proposed addition is not cantilevered, will have major visual and physical impacts and relies on significant structural modification.
- Policy 73 recommends considering vistas and views of the fPPb and relationship with Central Station. There is no analysis made in the HIS, graphics or studies to support the proposal.
- Policy 85 recommend that visual prominence of the fPPb to be maintained. The proposal does not maintain the visual prominence.
- Policy 89 highlights the necessity to maintain the landmark qualities and visibility of the fBBb's facades. The proposal fails to comply.
- Policy 90 recommends retaining views and vistas. The proposal is inconsistent with the policy as it obscures the eastern views and vistas and the general relationship with the fPPb.

It is noted that an assessment was prepared to investigate the presence or absence of Aboriginal objects that may exist within the subject area, which concluded that deeper, undisturbed soils under existing structures and below existing disturbance associated with historical land use has moderate archaeological potential regarding Aboriginal heritage objects. As such, the assessment recommends that an Aboriginal Cultural Heritage Assessment be included in any application. The City is concerned that this has not been included, and request that it be included.

Recommendations

- 1. Engage in an ongoing, meaningful consultation workshop process with the NSW Heritage Council to develop a proposal that will maintain the heritage values of the fPPb.**
- 2. Adopt one of the two independently written CMPs (one by the Government Architect's Office and one by TZG for TfNSW).**
- 3. Ensure the zone between the fPPb and the base of the tower is predominantly clear of structure to provide an appropriate curtilage to the heritage building.**
- 4. Modify the proposal to avoid intrusions that impact and loss of significant façade.**

Designing with Country

The City raises concern around the lack of evidence of significant and meaningful consultation with the City's Aboriginal and Torres Strait Islander Advisory Group and the Government Architect's Aboriginal Liaison Officer.

Recommendations

- 1. Engage in an ongoing, meaningful consultation workshop process with City's Aboriginal and Torres Strait Islander Advisory Group and the Government Architect's Aboriginal Liaison Officer.**

Open Space

While consultation is ongoing with the City on the broader SSP, no collaboration has been attempted for a coordinated urban design strategy for the whole precinct, including the Western Gateway. This is most concerning given the City's vision for a significant new public square at Central is adjacent to two frontages of the Block C site. The City recommends that the open space planning within the Western gateway be developed in collaboration with the City.

Notwithstanding the above the City notes the following specific concerns regarding the publicly accessible open space exhibited:

- The relationship between the development and the future square to its north and west is unresolved.
- The use of the term "public realm" (Planning and Justification Report) is confusing. It was noted in the City's previous commentary on the Draft Design Guide that the Western Gateway did not include any public domain, it includes publicly accessible private open space. It was recommended that "Public Domain" be replaced with "Open Space." It is noted that the current version uses "Public Realm", and Realm is a synonym of domain. Incorrect definitions of public domain may result in confusion for Development Assessment.
- The exhibited Planning and Justification Report includes assumptions about land outside the Western Gateway that will be determined as part of the next stage of works (e.g. RL 21 north-south link).
- It is acknowledged that a coordinated Public Realm Strategy will be prepared post exhibition and will be informed by the Design Guide. For a development of this size, the Design Guide should set the measurable criteria, including comfort and safety criteria for microclimate, to inform the development of the open space planning, not the other way around. This is a result of poor site planning and no coordination between the development sites and affected adjacent spaces, and likely to lead to poor outcomes.

Recommendations

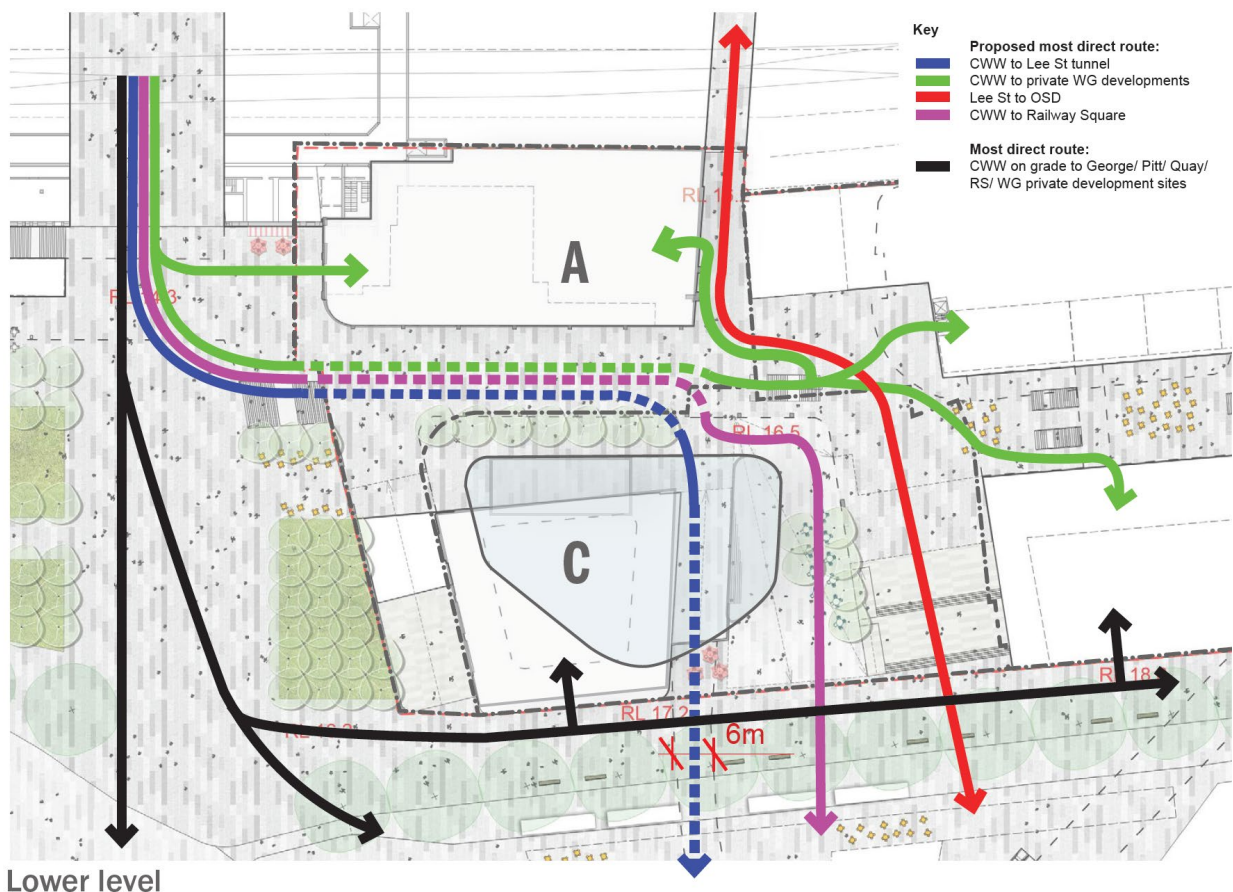
- **Engage in an ongoing, meaningful consultation between the City and State government to develop an open space strategy for the precinct.**
- **Replace reference to "public realm" with "open space".**
- **Remove all references in the Design Guide and supporting documentation to assumptions for land outside the Western Gateway that will be determined as part of the next stage of works including the north-south link connecting the Western Gateway to the Grand Concourse at RL 21 and reference the City's submission on the Design Guide from April 2020.**

Pedestrian Movement

The pedestrian modelling used to inform the open space and urban design responses have not been exhibited with the package. This information is critical to understanding the Western Gateway design responses for the sub-precinct.

Notwithstanding the above, it is understood that more than 10,000 people per day will exit Central Walk West in peak hour and move towards the at-grade crossing at the intersection of George St, Pitt St and Quay St. The City notes the following specific concerns regarding the proposed pedestrian movement as exhibited:

- A pedestrian movement analysis has not been provided as part of the exhibition package; however, reference is made to improving and prioritising the pedestrian experience within the Western Gateway. The proposed primary pedestrian paths are considered to be convoluted and of poor amenity, requiring paths of travel that are primarily underground and using bridges, and returning to street level within narrow escalators.
- Pedestrian connections at ground level, open to the sky, must be prioritised over underground and above ground connections. The below overlay highlights the pedestrian routes proposed in red, blue, green and purple, and in black what the City understands will be the most direct route, with highest pedestrian amenity.



Pedestrian connection overlay

The City challenges assumptions made in the exhibition documents that a major north-south pedestrian movement path will be required linking the Grand Concourse at RL 21 to Mortuary Station passing through the Dexu Frasers site. The City understands that the north-south pedestrian path will be a secondary link for workers exiting Central Walk West (CWW) employed in

one of the three development sites within the Western Gateway. The City understands from internal testing, that the primary movement of pedestrians exiting CWW will be west towards the intersection of George St, Pitt St and Quay St and not in a north south direction.

It is concerning that the focus on the RL 21 link to improve pedestrian connectivity appears to justify an additional 2,000sqm GFA under HDP and the lower levels of the hotel.

Recommendations

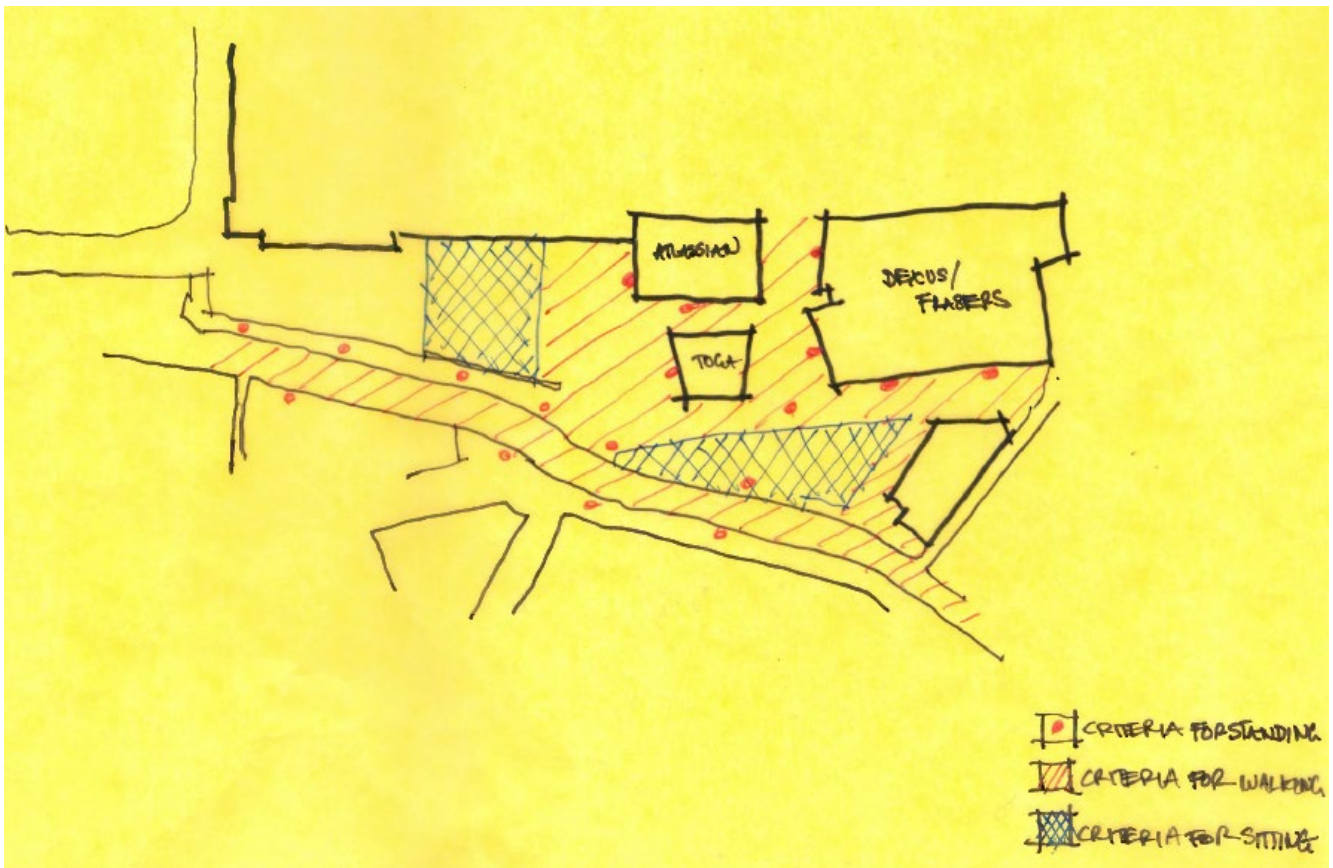
- **Make the pedestrian modelling used to inform the design of the Western Gateway public.**
- **Prioritise pedestrian connections at ground level, open to the sky preferred over convoluted, underground and above ground connections**
- **Remove all references to the north-south link connecting the Western Gateway to the Grand Concourse at RL 21 from the Design Guide and supporting documentation.**

Microclimate

The concept of a major new square at Central Station has been on the known for many years, and its structuring principles endorsed by the Council in 2020. The potential impact of the proposed tower on the microclimate in the adjacent future square is a significant concern for the City. There is no reference in the exhibited material to the microclimate conditions identified in the City's previous submission on the Draft Design Guideline. Specifically, there is no criteria established for wind comfort, or cross referenced with the Design Guide.

Notwithstanding the above, the City notes the following specific concerns regarding the impacts of the proposed tower on the microclimate within and adjacent to the Block C development:

- The wind comfort standards (exceeded 5% of all hours) should be the following as per the locations identified in the following map:
 - walking through the OSD connection and footpaths - 8 m/s
 - standing at building entrances, bus stops - 6 m/s
 - sitting in future public spaces - 4 m/s



Proposed wind comfort standards

- It is noted that advice in the City's previous submission on the Western Gateway Blocks A and B was that the impact of wind should be mitigated through envelope and not canopy structures. It is noted that this is not achievable for a tower of 41,000sqm. The uncomfortable and unsafe wind conditions between Blocks A and C and Blocks A and B will have to be addressed through canopies etc.
- The wind modelling appears to have been prepared based on the refined, anticipated building form and not the envelope. Including wind standards in the Design Guide would ensure that there is consistency between the wind modelling report and the envelope- i.e. rounded corners and flat top must be consistent with envelope as these will affect the wind comfort.

The wind modelling should be assessed against the comfort criteria stipulated in the Design Guideline criteria and the recently approved Central Sydney Development Control Plan clause which states that if the existing condition is uncomfortable or unsafe then it must not be made worse. Locations where the modelling shows worse conditions with the addition of the TOGA tower include:

- Locations 9 and 10 (North eastern corner HDP)
- Locations 13 and 14 (Between Blocks A and C)
- Locations 29 and 30 (Devonshire St bridge and stair to OSD)

Recommendations

- **Adopt wind comfort standards in the Design Guide and supporting documents with locations as per the above map for land within the Western Gateway and adjacent affected land.**
- **Undertake wind tunnel testing on the proposed envelope and not the reference design since the final design could fill the proposed envelope.**

ADDITIONAL RECOMMENDATIONS

Ecological Sustainable Development (ESD)

The City is concerned about the lack of an integrated, precinct-based approach to ESD measures for all three developments within the Western Gateway sub-precinct.

The ESD report does not discuss the most recent Green Star tools, does not specify mechanisms for implementation and requires more detail to prove assumptions.

The City has the following specific comments on the ESD commitments outlined in the exhibition documents:

Rating targets and benchmarks

NABERS

- The proposed Energy Target of NABERS 5.5 (office) and 4.5 (Hotel component) are acceptable for an existing building context compared to new.
- It is acknowledged that separate NABERS Rating Targets for different parts of a building (hotel / office) can be a challenge.
- The ESD report and any consents from Department of Planning Industry and Environment (DPIE) should require a “NABERS Energy Commitment Agreement” as the mechanism to ensure the Targets are delivered once building completed and occupied

Greenstar

- The proposed target of 6 Star is appropriate.
- Credits are to be maximised in the most important and urgent theme areas of Energy/Carbon and Water Conservation
- It is important to seek the proponent’s awareness of revised GreenStar tools and not reference version 1.2 specifically in case this is not the most contemporary version of the tool at time of lodgement

Zero carbon building

- The City strongly supports this initiative, but more detail is needed about the commitment to “Minimise combustion in building systems to enable zero-carbon operations through renewable power purchase” (page 4 ESD Report).
- A proposal for off-site renewable power purchase is supported to achieve Zero Carbon. Mechanisms (for example, a power purchase agreement with contract for 10 years) are to be established to ensure this ‘commitment’ (net zero) will be delivered.

Precinct based energy supply options

- The City supports the commitment to: “4.2.6 Explore options for shared utility supply across the precinct, including:
 - Central district thermal energy plant (chilled water and hot water)
 - Central emergency power supply
 - Central thermal and electrical storage facility
 - Embedded network to enable energy sharing or trading between different buildings and end users”

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- If the benefits of precinct scale solutions are to be realised, the NSW government needs to proactively require precinct thermal energy plant connectivity, energy storage and inter-building energy exchange and actively facilitate options discussion between adjoining developments.

Precinct based non-potable water supply options

- The City supports the commitment to: “6.2.7 Explore options for shared precinct water recycling plant, including:
 - Wastewater capture and treatment to tertiary standards
 - Precinct-wide recycled water supply
 - Sewer mining capability to stabilize flows, and to support municipal water system as needed”
- If the benefits of precinct scale solutions are to be realised the NSW government needs to proactively require connectivity (i.e. future proof buildings by installing dual plumbing networks) and actively facilitate options discussion between adjoining developments.

Thermal envelope performance insulation

- Insulating existing walls in heritage buildings requires sophisticated design and construction methods. The planning framework should require the solution to be developed early. If the issue is left unresolved until National Construction Code (NCC) Section J (Energy Efficiency) at Construction Certificate stage, the improved thermal performance of external walls may be compromised. This is a building resilience matter given increased number of extreme heat days and extended heatwaves.
- The City recommends the design solution of insulating existing walls also addresses condensations risks.

On site renewable energy generation via photovoltaics

- Opportunities for using the roof should be explored as it has good middle of day solar exposure and this is protected into the future by Railway Square.

Transport

The City identifies the following key issues regarding transport:

- The study has not estimated service vehicle number, size and coach/bus and drop off /pick up vehicles number. It has not provided traffic impact from this development to the adjacent network. The planning framework must include measures to service the developments with shared loading onsite without impact the public domain and pedestrian movements.
- The following documents need to be consulted and implemented to any future proposal on this site (in addition to the documents that are listed in GTA’s report).
 - City of Sydney Cycling Strategy and Action Plan [2018-2030](#).
 - City of Sydney Walking Strategy and Action Plan [2015-2030](#).
 - Relevant Internal studies such as (some studies could be confidential; please check before you send those to the applicant)
 - Pentelic Advisory’s Preliminary Transport Context Analysis provides a basis of current and future access needs of the site.
 - Camperdown Ultimo Collaboration Precinct
 - Camperdown-Ultimo Place Strategy
- The City does not support the proposal to use the proposed carparking rates in this location, which has the highest level of access to public transport. The City recommends zero commuter car parking on site.

Submission on Draft Central Western Gateway Block C Rezoning Proposal

- The City's interest in Central Station is for the long term, and the design and planning for the precincts needs to reflect this long horizon. The proposal must therefore not be limited to only guiding the development's direct footprint in the short-term but also its wider impact on the precinct in the long-term.
- TfNSW and City of Sydney have been doing significant work to understand the future opportunities and vision for the Central Precinct.
 - The future layout of Lee Street is likely to deprioritise or be closed to vehicle movement
 - The future layout of Parramatta Road is likely to reallocate several lanes from vehicles to people and place
- The proposal suggests the bus/taxi drop off will be on Lee Street in front of the site which does not align with the above vision. Moreover, Sydney DCP requires drop/off pick up locations to be located within the site. Any future proposal will have to comply with these requirements.
- Vehicle access and associated traffic modelling should include all future potential road closures.
- The proposal is to strictly comply with section 7.8 of DCP 2012 for loading and service vehicle parking spaces and to include this in the Design Guide.
- The proposal is to meet Council's requirements of section 3.11.13 of the DCP for waste collection. Note that, waste collection vehicles are usually larger than an MRV.
- Any future proposal to this site must comply with Council DCP 2012 Clause 3.11.3 and relevant Australian Standard AS 2890.6:2015 and provide adequate bicycle parking and end of trip facilities.



5 February 2021

Aaron Nangle
Department of Planning, Industry and Environment
Issued by email

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Ref: GW20031706

Re: Draft Central Western Gateway Block C Rezoning Proposal – Submission

This submission has been prepared on behalf of Frasers Property Australia and Dexus Funds Management Limited (the Consortium) in response to the exhibition of the draft Central Western Gateway Block C Rezoning Proposal prepared by Transport for NSW (TfNSW) (November 2020).

The Western Gateway sub-precinct is to be delivered by multiple proponents across the sub-precinct, with separate proponents for Blocks A, B and C. As the major leaseholder and developer for Block B within the Western Gateway sub-precinct (herein referred to as Central Place Sydney), the Consortium welcomes the opportunity to comment on the Block C Rezoning Proposal.

Introduction

The Western Gateway presents an opportunity to catalyse change in the broader Central Precinct and create new dynamic civic spaces and workplace. Central Place Sydney and the wider precinct is key to ensuring Sydney remains globally competitive and a city that continues to attract talent, investment and business partnership opportunities.

Central Place Sydney's strategic location allows it to unlock the future potential of Blocks A and C, as well as future over station development, by providing essential above and below ground services which will benefit the entire Precinct. The proposed access and servicing arrangements (including potentially the Integrated Distribution Facility) will service all development in the Western Gateway.

An essential success factor for Tech Central, and more specifically the Western Gateway sub-precinct, will be the achievement of the highest quality publicly accessible spaces, public domain, and architectural design solutions. The coordinated access, servicing and basement arrangements are pivotal to the delivery of a holistic and functional public realm outcome, that is vibrant, pleasurable and can be enjoyed by public transport customers, residents, students, workers and visitors.

The Consortium supports the redevelopment of Block C and the opportunities and benefits it will contribute to the Central Precinct and Tech Central. We also acknowledge the revitalisation will complement Central Place Sydney and vice versa by providing a variety of business, retail, and recreational experiences. This submission highlights the key matters that require further resolution and clarity to ensure the delivery of a high-quality sub-precinct for the benefit of all future tenants and visitors, through the provision of a cohesive public domain, and an access, movement and circulation framework that fulfills TfNSW operational and technical requirements and provides intuitive connections to public transport and other key destinations within and adjoining the sub-precinct and Tech Central.

This submission highlights several technical considerations for the DPIE to consider as part of its assessment to ensure orderly coordination of precinct outcomes. These are primarily focused on following two areas:

Building mass on the southern face of Adina Hotel

1. The Consortium is of the view that any built form landing on the plaza should be limited to lightweight structural elements only (i.e., not building core such as lifts, stairs or services) and that Section 3.1 and 3.3 of the draft Design Guide should be amended to reflect this.
2. The inclusion of appropriate controls in the draft Design Guide to address the treatment of the southern façade of the proposed tower and prioritise pedestrian circulation and activation at the ground plane.

Technical clarifications

3. Consideration of the titling arrangements in the Precinct insofar as they may impact on the delivery and staging of the proposal.
4. Clarification of the proposed building envelope at lower levels within Henry Deane Plaza – with reference to applicable RLs and site boundaries.
5. Note that the wind modelling was completed on the indicative scheme for Block B and future wind studies will need to incorporate the final Block B Development Application built form to ensure the established wind comfort criteria for Blocks A and B are not compromised.
6. Complete traffic assessment of the additional proposed traffic load, noting that the proposed servicing arrangements via Block B remain subject to the proponent reaching commercial agreement with the Consortium.

Building mass on southern face of Adina Hotel

Henry Deane Plaza is one of the busiest public areas in Sydney. Whilst the configuration of the plaza will evolve following the introduction of the Western Walk, it will continue to be a crucial functional and visual link between Railway Square and the future over station deck. It will also contribute to the hierarchy of public realm spaces and links framing and modulating the journey across the precinct. Intrusive built form elements (such as the proposed southern core, including lift core) would significantly impact on building separation and impede visual links between Railway Square and the future OSD steps. Whilst the design is at concept stage only, it is suggested that Sections 3.1 and 3.3 of the Western Gateway Design Guide limit built form adjacent to the southern face of the Adina to architectural light weight columns only. This will be critical to pedestrian movement and circulation and will also reinforce Henry Deane Plaza's unique identity as an urban public realm and transition space between the built form and experiences on offer through the sub-precinct.

Developments such as 8 Chifley Square and 200 George Street are useful examples (see below) that demonstrate sympathetic placement of structure into and above the public realm and heritage buildings that could inform design guidance for Block C and contribute to ensuring the public realm and movement character of Henry Deane Plaza is prioritised.



The design and development of Henry Deane Plaza needs to be subject to ongoing coordination and collaboration between the multiple proponents to ensure a cohesive outcome and delivery of the highest quality public realm. The Consortium requests the DPIE require the Block C building envelope to be explicitly defined as RLs at the Henry Deane Plaza along all site boundaries. Further, the Block C Rezoning Proposal should demonstrate that it will not hamper access arrangements to Block B, particularly while Henry Deane Plaza remains in its current state. Detail should consequently be sought in relation to existing and future levels under different development scenarios.

Technical Clarifications

Titling

The Consortium's ownership across Central Place Sydney is extensive. The arrangement of the lots varies in shape and area between the upper and lower levels. The lots held by the Consortium are summarised as follows:

- Lot 12 DP 1062447 – Dexu CPA Pty Ltd
- Lot 14 DP 1062447 – Henry Deane Building Nominees Pty Ltd (subsidiary of Frasers Property Australia)
- Lot 15 DP 1062447 – Gateway Building Nominees Pty Ltd (subsidiary of Frasers Property Australia)

The Consortium also benefits from easement rights over Block C (Lot 13 and Lot 30), the extinguishment of which is currently subject to commercial negotiations with the proponent.

The diagrams below illustrate the ownership structure and property boundaries:

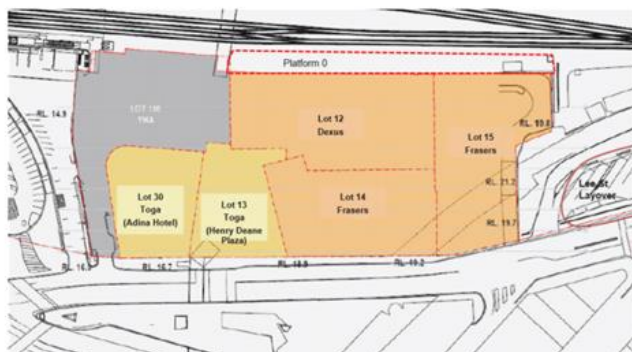


Figure 2.1 Ownership Above Ground
 LOT 12 Dixie CPA Pty. Ltd.
 LOT 14 Henry Deane Building Nominees Pty. Ltd. (Fraser's Property)
 LOT 15 Gateway Building Pty. Ltd. (Fraser's Property)

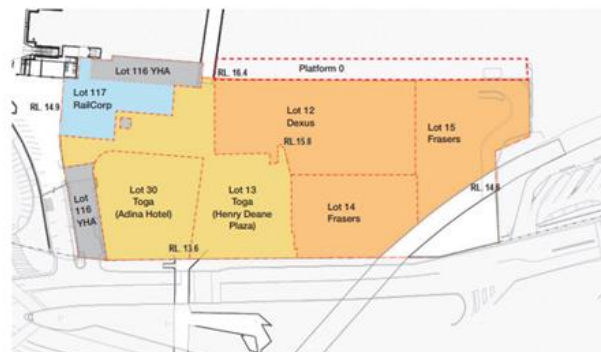


Figure 2.2 Ownership Below Ground
 LOT 12 Dixie CPA Pty. Ltd.
 LOT 14 Henry Deane Building Nominees Pty. Ltd. (Fraser's Property)
 LOT 15 Gateway Building Pty. Ltd. (Fraser's Property)



Wind

The Consortium has worked constructively with the DPIE, Transport for NSW and Atlassian (Block A proponent) over the past 6 months to establish suitable wind comfort criteria for the intended purpose across Blocks A and B. This has entailed modelling of individual blocks, cumulative impacts and developing a sub-precinct wind comfort map that will be included in the Western Gateway Design Guide (once adopted).

Pedestrian wind comfort has consistently been a key concern raised by the DPIE and City of Sydney, and accordingly the Consortium contends that Block C should be required to complete wind modelling and assessment in the same manner as Blocks A and B to ensure the established wind comfort criteria for Blocks A and B are not compromised.

The Block C wind assessment is based on the reference scheme for Block B, and consequently the expected wind conditions may vary. Ultimately a revised wind modelling and assessment should be undertaken, informed by the future Development Application for Block B, to confirm that the criteria are correct for the intended purposes across Henry Deane Plaza and the public realm.

Traffic, Transport & Parking

The Consortium notes the Block C Rezoning Proposal will ultimately be reliant on vehicle access through the Central Place Sydney ramp to Lee Street. This is consistent with the TfNSW Transport Requirements and is necessary to unlock the optimal pedestrian outcome for the reinvigorated Western Walk entrance to Central Station. Whilst the Consortium agrees with the principle of ultimately providing access through the Central Place Sydney site, we note that:

- a) limited assessment of the traffic implications of this arrangement has been undertaken; and
- b) the design and access arrangements remain subject to commercial negotiations currently underway between the two parties.

The Block C Rezoning Proposal has not considered the traffic implications of having a primary access via Block B, which could potentially lead to vehicles queuing on Lee Street. The Consortium accordingly recommends the Block C Transport Assessment be revised to consider the potential impacts of introducing new land uses, more GFA and the consequential need for alternative access and servicing requirements.

The Consortium notes that access to the Block C basement through Block B's ramp and driveway system and via a direct connection from either the Block B basement or the Block A basement is subject to separate commercial negotiations.

Specifically, we suggest the following matters be addressed in any future revision to ensure appropriate access and servicing arrangements can be achieved:

- Consider the cumulative impacts of proposed Block C servicing on the existing vehicle traffic which will be facilitated by Central Place Sydney (c.430,000sqm).
- In advance/lieu of this service arrangement being provided, demonstrate that access and servicing can be provided to Block C without reliance on Block B, should that latter not be delivered or suitable arrangements between the two parties cannot be reached.
- Stronger justification for the proposed Lee Street pick-up/drop off zone Lee Street, and careful consideration of, and implications on, pedestrian travel paths and the public domain.

Conclusion

The Consortium would welcome the opportunity to discuss the Block C Rezoning Proposal and matters outlined above with DPIE and TfNSW. Please contact the undersigned on 0412 775 365 should you have any questions.

Yours sincerely



Stephanie Ballango

Director, NSW Property Consultancy (Planner)

cc: John Dawson, Frasers Property Australia
Stuart Carr, Dexus Funds Management Limited



DOC21/38501

Planning and Assessment Division
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124
Email: Aaron.nangle@planning.nsw.gov.au

27 January 2021

No Comment to Planning Advice Request

Thank you for the request for advice from the NSW Environment Protection Authority (EPA) on the rezoning application for the proposed Central State Significant Precinct – Western Gateway Sub-Precinct.

The proposal is for:

- Keeping the existing B8 Metropolitan Centre zone, which enables the delivery of commercial, retail, business and hotel premises on the site.
- A site-specific provision for Block C that will:
 - Allow an additional 43,000 square meters of gross floor for non-residential purposes;
 - Increase building height control up to RL211.9 (or about 42 storeys); and
 - Ensure high-quality design.

Based on the information provided, the proposal does not appear to require an environment protection licence under the *Protection of the Environment Operations Act 1997*. Furthermore, the EPA understands that the proposal is not being undertaken by or on behalf of a NSW Public Authority nor are the proposed activities other activities for which the EPA is the appropriate regulatory authority.

In view of these factors, the EPA has no comments to provide on this project and no follow-up consultation is required. Council of the City of Sydney should be consulted as the appropriate regulatory authority for the *Protection of the Environment Operations Act 1997* in relation to the proposal.

If you have any questions about this request, please contact Environment Line on 131 555 and quote the reference number.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Steve Beaman', written over a light blue horizontal line.

STEVE BEAMAN PSM
Executive Director Regulatory Operations
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By email: Aaron.Nangle@planning.nsw.gov.au

Dear Aaron

RE: Proposed amendments to the planning controls for Block C (Adina Hotel) within the Western Gateway sub precinct

Thank you for your invitation seeking comment from the Heritage Council of NSW on the proposed amendments to the planning controls (draft SEPP Report) for the Western Gateway sub-precinct Block C (email received 11 January 2021).

Heritage NSW is providing these comments as delegate of the Heritage Council. I note that this project is part of the NSW Government's transformational vision for the Western Gateway sub-precinct of Central Railway Station, and for the Central Precinct more broadly.

We note also that the proposed amendments to the planning controls for the Western Gateway sub-precinct Block C include:

- Changes to the Sydney LEP 2012
 - Amendment to maximum building height and gross floor area controls
 - Exclusion of Clause 6.21(5)-(7) – removal of eligibility to additional height or floor space that is the result of a competitive design process

Based on our review we provide the following comments on the proposed planning control amendments to Block C (Adina Hotel) within the Western Gateway sub-precinct.

Heritage context of the proposed development

- The development involved development within and adjacent to the State Heritage Register (SHR) listed Sydney Terminal Rail and Central Railway Stations Group, recognised as of exceptional significance as Australia's largest transport interchange. The site was the first major terminus to be constructed in Australia and the only example of a high-level terminus in the country. It is also significant for its continuity of railway use since 1855 and as the largest formally planned addition to the urban fabric of Sydney prior to World War 1, intended to form a gateway to the city.
- The proposed Western Gateway sub-precinct development is part of the broader Central State Significant Precinct (CSSP), which encompasses the entire SHR-listed Sydney Terminal Rail and Central Railway Stations Group (SHR 01255) and Mortuary Railway Station (SHR 01869) sites. The Western Gateway sub-precinct contains the former Parcels Post Office building (now Adina Hotel), the former Inwards Parcels Shed (now

YHA), and the portals to the Devonshire Street tunnel. This sub-precinct comprises three allotments - Block A (Railway Square YHA Shed), Block B (Henry Deane office block), and Block C (Adina Apartment Hotel).

- The Block C development area contains the former Parcels Post Office Building and the adjacent Henry Deane Plaza. The former Parcels Post Office (1910-13) is of heritage significance for its historic, associative, aesthetic and representative values, as well as its rarity. The building is a key significant element within the Central Railway Station landscape and has strong visual and historic connections to the Central Station northern concourse and clock tower, the adjacent former Inwards Parcel Shed, as well as the broader Central Railway Station context.

General comments

- The Heritage Council has previously stated its recognition and support for appropriate development in and around this sensitive precinct as part of the positive evolution of the city. The Council recognises however that the large scale towers will result in adverse visual impacts to the Central Railway Station site, in particular, as it does not relate to the predominant scale, density and grain of the significant built form, the fabric of the SHR-listed building elements, and cultural landscape context.
- The proposal will also have obvious impacts to the setting, character and landmark qualities of the former Parcels Post Office building given the scale of change to the Western Gateway sub-precinct site. This underscores the importance that key heritage values, elements, and views and vistas remain central to any redevelopment of the area.
- It is understood that this draft SEPP Report does not seek consent for the indicative reference scheme and that any future development within Block C will be subject to a competitive design process and subsequent Development Application and assessment process. It is recommended that ongoing consultation and input from Heritage NSW is undertaken as part of this process.

Building Height

- The proposal includes amendment to the maximum building height controls within Block C to a new maximum height of RL 211.9 metres AHD. This represents a significant increase in the allowable height of development of the site.
- The Heritage Council understands that the proposed maximum building height amendment for this site will enable development that visually impacts the landmark former Parcels Post Office building. New development is unlikely to retain the predominant scale, density and grain of the existing built environment and context of the SHR-listed sites.
- We note that together, with the proposed Block A and B developments within the Western Gateway sub-precinct, the tower cluster will result in cumulative heritage impacts on the designed physical and visual prominence of the Sydney Terminal Rail and Central Railway Stations Group generally, including their landmark heritage qualities. However, the Heritage Council notes that these impacts could be somewhat reduced through high-quality design that puts the significant heritage values of the site at the core of the redevelopment.

Gross Floor Area

- We understand that the proposed amendments to the gross floor area (GFA) will increase the maximum GFA from the current maximum 3:1 to 43,000m². This represents

a significant increase in GFA which will be potentially difficult to respond positively to the existing form, bulk and scale of the former Parcel's Post Office building.

Building envelope

- We note the proposed amendments to the planning controls for Block C of the Western Gateway sub-precinct identify the development envelope of a future commercial tower above/adjacent to the former Parcels Post Office building. We also understand the development for the Block C building will be subject to the future detailed design, including the form, architectural detailing and materials.
- The former Parcels Post Office is an iconic landmark within the Central Railway Station context, which was originally located to dominate its surroundings. Its context and setting are identified as being of exceptional significance (CMP, 2013), and the building is an intrinsic part of the main railway buildings that make up the Central Railway Station Group.
- The distinctive building contains fine brickwork and sandstone detailed facades and features high quality design, materials and construction also seen in other built elements within the Central Railway Station site including the main terminus building, Railway Institute, Chalmers Street entrance and the Central Electric Station main façade. This shared characteristic provides a unifying feature of the site's built environment.
- The proposed large-scale tower envelope over/adjacent this corner building has potential to diminish the identified landmark qualities and the setting of the building. It could also obscure whole facades of the building. Currently the entire building is legible from all sides which further emphasises its importance and prominence in the landscape.
- Whilst it is noted that a 5-10 metre minimum setback from the northern and western facades is proposed for the tower structure envelope, to limit impacts to the prominence of the building when viewed from Railway Square and Sydney's potential Third Square, the proposed envelope will obscure the eastern and southern facades. This will impact the building's landmark qualities when viewed from Lee Street. The Heritage Council however feels that visual impacts could be mitigated if the proposed setback is substantially increased behind the northern and western facades and to preserve the integrity of views to the building. We would welcome detailed design to achieve this outcome.
- The former Parcels Post Office building is historically significant for its association with the development of the NSW rail and postal services in the early 1900s. The location of the building adjacent to the station reflects the importance of parcel distribution by rail. The building worked in conjunction with the former Inwards Parcels Shed and platforms in the western yard precinct. It is critical that these physical, functional and visual connections are retained and interpreted, and not obscured.
- Detailed consideration should be given to the form of any approved building in this sensitive environment, so that it respects the heritage values, character, form, proportions and setting of the existing structure. In our mind, this includes retention of visual and historic connections between the historic building and Central Railway Station and that any new build seeks to minimise, where possible, penetrations and disruption of spaces and historic fabric that talk to the building's former function.
- It is noted that the proposed envelope extends 16 metres into Henry Deane plaza. It is unclear how this will impact the prominence of Marcus Clarke tower when viewed from

the east/west connection across Central Precinct. Further visual studies should be undertaken to ensure the retention of views to the central tower of the significant Marcus Clark Building.

Draft Design Guidelines

Considering the above, the Heritage Council recommends that the following amendments to the *Draft Design Guide Western Gateway Sub-precinct* are made to better respond to the significant heritage values of the Central Railway Station site. Suggested amendments to your draft document are shown in **bold italics**.

2.1 Desired future character

The Western Gateway sub-precinct will:

(a) Create a new and exciting 'destination' at the southern end of Central Sydney

(b) Form an important sub-precinct to the broader Central Precinct, including an entrance to the planned future Over Station Development

....

(h) Be characterised by a built form that embraces and celebrates the area's historical significance, **responds sympathetically to the existing visual, spatial, and physical character of the place** and enables the retention and adaptive re-use of key heritage items.

....

(n) Embeds the Aboriginal and Non-Aboriginal historical and cultural values of the place (including intangible values) in a holistic and integrated way through a Heritage Interpretation strategy for the entire precinct identifying key themes, stories, social values, interpretive opportunities, measures and locations as an integral component of creating a unique and exciting destination. To assist with this task, the project team are encouraged to reference the GANSW 'Connecting with Country' framework released November 2020.

3.2.1 Heritage

Objectives

(a) Development should **demonstrate an understanding of, and** appropriately respond to **the visual, physical and spatial character of the place including** items of heritage significance within the sub-precinct **(and the broader Central Precinct)** and ensure items of heritage significance **and their heritage values (including intangible values)** are maintained and celebrated **to create a unique and exciting destination** wherever possible.

(b) Development should retain and re-use any assessed heritage significant **heritage items**, features, specific spaces and fabric of significance.

(c) Development should enable the sensitive adaptive re-use of any assessed heritage significant **heritage items**, features, specific spaces and fabric of significance.

(d) Development should respect as much as practicable the context, character and setting of heritage items, including connections with surrounding items, views and vistas.

Design guidance

(1) A Statement of Heritage Impact is to accompany any future DA for new buildings within the sub-precinct and is to be prepared in accordance with the NSW Heritage Manual 'Statement of Heritage Impact.' **It should demonstrate an understanding of**

the heritage and cultural values of the place and include consideration of the Western Gateway sub-precinct as a whole, and the wider Central Precinct.

(2) Any future DA for new buildings within the sub-precinct is to be accompanied by an ***integrated Western Gateway sub-precinct*** Heritage Interpretation Strategy (***co-ordinated with across the entire Central Precinct***), that identifies opportunities for the presentation of the history of the site and surrounds. ***It is recommended that a program of Aboriginal ceremony be developed to re-awaken the landscape as part of the proposal.*** This should include Aboriginal and non-Aboriginal themes ***such as living cultural practices, stories (including Stolen generation stories), social values, interpretive opportunities, measures and locations*** and present the findings of any desktop analysis of the likely archaeological significance of the site and the immediate surrounds. All documentation should be prepared in accordance with Interpreting Heritage Places and Items Guidelines.

(3) Development should comprise ***of*** building forms and design treatments that give consideration and positively responds to heritage items within and immediately surrounding the sub-precinct ***with specific consideration to the bulk, height and scale of the existing significant elements of the site, including its setting, context, streetscape, and visual and physical character of the locality.*** The Statement of Heritage Impact that accompanies a development application should identify and assess any direct and/ or indirect impacts (including cumulative impacts) to the heritage significance of the buildings and elements within the precinct. ***It should also provide an understanding of the place's heritage values and assess opportunities that arise from these.***

~~(4) Buildings should be constructed of durable and robust materials.~~

(5) Architectural detailing should provide a higher order of priority to the levels interfacing with the heritage items and adjacent public domain. ***It should take an informed and strategic approach to form, colour, materials, and details and respond to the immediate context and character.***

(6) Development on Block A is to:

- a. provide a minimum clearance of 10.8m between the topmost point of the roof of the Former Inwards Parcel Shed and the underside of any tower generally in accordance with Figure 6: Separation Distances and Setbacks
- b. retain the simple form of the Former Inwards Parcel Shed, including the form and shape of the roof, an understanding of the bolted timber post and truss system
- c. incorporate a building design and materiality that appropriately responds to the Inwards Parcel Shed, the Former Parcels Post Office and Central Station

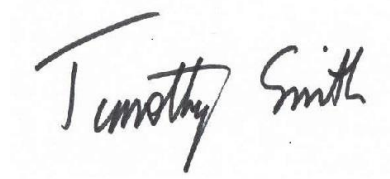
(7) Development on Block B is to

- a. ensure the materiality and design of the podium responds to the scale and materiality of the surrounding built form character (e.g. Central Station, ***Mortuary Railway Station***, Marcus Clarke Building and the Former Parcels Post Office, ***railway lines***) and is designed to be visually distinguished from the towers above.

Thank you again for this critical opportunity to comment on the proposed amendments to the planning controls for Block C to ensure balanced heritage outcomes. If you have any queries regarding the above matter, please contact Tim Smith OAM, Director Operations at Heritage NSW, Department of Premier and Cabinet on 0419 648 933 or by email at tim.smith@environment.nsw.gov.au.

The Heritage Council of NSW signals its desire to drive positive heritage outcomes within this bold city-shaping Western Gateway Precinct uplift.

Yours sincerely

A handwritten signature in black ink that reads "Timothy Smith". The signature is written in a cursive style with a large, sweeping initial 'T'.

Tim Smith OAM
Director Heritage operations
Heritage NSW, Community Engagement
Department of Premier and Cabinet
As Delegate of the Heritage Council of NSW
10/2/2021



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JAMIE PARKER MP
Member for Balmain



The Hon. Rob Stokes
Minister for Planning
GPO Box 5341
Sydney NSW 2001

Friday, 29 January 2020

Objection to Central Precinct Western Gateway Block C rezoning proposal

Dear Minister,

I am writing in my capacity as the NSW Greens spokesperson on Heritage to make a submission on the proposed rezoning of Central Precinct, Western Gateway Block C.

I am concerned that the proposal fails to uphold the important heritage principle of "designing in context" and would contravene the current Conservation Management Plan for the precinct.

In particular the proposal, along with adjacent proposals on top of the 1906 parcel shed (Block A) and the City of Sydney's "garden square" plaza will remove the original elevated approaches to the station and significant colonial architecture, and pave the way for further detrimental alterations across the precinct. Towers on top of and beside historic buildings will be detrimental to views, landscape and the sense of space within the precinct.

I object to this proposal.

If you have further questions about this submission, please do not hesitate to contact me on 9660 7586 or jamie.parker@parliament.nsw.gov.au

Yours sincerely,

Jamie Parker MP
Member for Balmain

29 January, 2021

NSW Department of Planning, Industry and Environment

Submitted online

***Draft Strategic Vision for the Central State Significant Precinct and
Western Gateway Rezoning Proposal***



Railway Station & Parcels Post Office Central Square Sydney (Source: National Museum of Australia, 1986.0117.5688)

The National Trust makes the following submission on the draft rezoning proposal for Block C of the Western Gateway sub-precinct of the Central State Significant Precinct. The proposal seeks to amend the Sydney LEP 2012 to enable development above the Parcel Post building (the Adina Hotel). It is stated that “the new planning controls would also allow for a new north-south thoroughfare and an improved public plaza linking Railway Square with the new public domain in the Western Gateway.”

Central Station is a building of the highest architectural importance to Sydney, and its construction was directly responsible for the surrounding environment. When the National Trust listed the *Central Station / Haymarket Urban Conservation Area* in June 1981, it noted that:

“(when) the railway terminus shifted from Redfern to Central, and Railway Gates (Railway Square) became a major station for trams and cabs as well. Banks, department stores, theatres, office buildings, public and institutional buildings, and the vast railway structures themselves, imposed on the district the character it

largely retains today. This is in great measure also due to the impact of the railways: the area declined with the building of the city circle and harbour crossing, 1926 to the mid-1930s, which encouraged a shift in business activity northwards.”

Central Precinct Renewal Program’s Draft Strategic Vision for the Central State Significant Precinct and Western Gateway Rezoning Proposal. It is noted that the stated aim of the program is to “create a precinct with a real sense of place, which connects into surrounding neighbourhoods, and draws on the character and heritage of this landmark location.”¹ This is an admirable aim, and it is hoped that measures are put in place to ensure that this is indeed the outcome of this massive project.

There is little doubt that the areas surrounding Central Station can benefit from some renewal projects, and the National Trust supports aims to revitalise this important area of the city. The Trust are however concerned with the way this is done, and encourage that the important and historic existing components of the place are seen as enablers of, rather than barriers to, a place with a unique urban identity.

The Parcels Post Office Building, constructed in 1913 and designed by the NSW Government Architect is a key contributing item to this precinct. It is listed as an item of local heritage significance under Schedule 5 of the Sydney Local Environment Plan 2012, (Item 855) and is also included within the Central Railway Station State heritage listing (Sydney Terminal and Central Railway Stations Group, SHR 01255). The building was individually listed by the NSW National Trust in 1979. The Trust noted in its reasons for listing:

“This uncompromising design results in a building capable of competing with, and enhancing, the formidable area of Railway Square to the west and, to the north, agreeing particularly well in style and scale with Central Railway Station. These two buildings, with the enclosed park, planting and railings and the monumental Pitt Street colonnade beneath, form a particularly good and imposing example of Edwardian urban design.”

The proposal which is currently being put forward, would have a severe negative heritage impact on this building and its wider setting. This “particularly good” example of past urban design is set to be replaced with an excellent example of the worst in current planning practices – where a new tower will literally overhang a unique historic building and overshadow a public area.

The Parcels Post building was specifically designed in response to its location as a building to be seen “in the round”. It is a sophisticated, sculptural, Mannerist design and makes an important contribution to its setting on all sides, and in its current state it responds to the Henry Dean Plaza and Railway Square in particular. These are important elements of its curtilage, and setting. The current proposal will relegate the Parcels Post building to a mere postage stamp at the base of this new tower.

The National Trust is opposed to the building of a tower over and above this important building. We disagree with the Heritage Impact Statement (prepared by Urbis, November 2020) which states (p.1) “the proposed tower envelope is partly built over the heritage item and partly over the plaza to the south... this offset form of separation and suspension creates a physical and visual curtilage for the former Parcels Post building and enables the building and tower to be read independently, with the heritage item maintaining its prominence in the streetscape and views.” It is difficult to understand

¹ <https://www.transport.nsw.gov.au/projects/current-projects/central-precinct-renewal-program>

how an addition of over 200m which overhangs the building creates a positive visual and physical curtilage to this important building or allows it to maintain its prominence in the streetscape.

The argument in the Heritage Impact Statement (p.1) that “the robust nature of the building” allows it to accommodate such an intrusion is not an argument the National Trust would support. It is indeed the robust and dignified qualities of this important building that the Trust seeks to maintain.

Sydney is a city that needs to do better than simply “retain” this heritage building. We need to ask ourselves what are we retaining it for? The broader precinct plans for the Central Station redevelopment present many fantastic opportunities to engage with the heritage qualities of the area. The successful works at Central Park only serve to highlight the positive ways in which heritage conservation and activation can improve the amenity of a redeveloped area and build on (and indeed create) a unique character for a place.

At the time of its construction, Sydney’s Central Station was, in the words of the Draft Strategic Vision, “inspired by the grand classical stations of Europe.”² The redevelopment of the site should also be influenced by the best of modern planning strategies and station redevelopments. The massive renewal of London’s Kings Cross St Pancras Station has been achieved without the need for multiple high-rise buildings, and the existing heritage buildings within the precinct have been carefully and thoughtfully remodelled and reinvigorated – without the need to add a tower on top. Even Tokyo Railway Station retains a dignified setting despite the development pressures of that city. We hope that the redevelopment of Sydney’s Central Station can be a model of successful renewal on a scale that aligns with the important heritage buildings and connections of the place. The Trust supports the Preliminary Precinct Plan aims regarding Built Form and Heritage that the precinct should:

- “Establish a context-responsive built form approach that achieves a balanced distribution of height, density and scale”
- “Reinforce the iconic architecture of the Sydney Terminal building, former Parcels Post Office and Mortuary Station as important and defining character elements in the streetscape”
- “Establish a sensitive built form response to heritage interfaces, including retaining a sufficient heritage curtilage and separation to potential future development and visual connections to key heritage items.”
- “Ensure that any proposed built form does not reduce the amenity of existing public open space, particularly Prince Alfred Park”³

The proposal is at odds with most of the expressed visions for the Central Precinct, in particular the aims to “establish a **context-responsive built form approach** that achieves a balanced distribution of height, density and scale” and “reinforce the iconic architecture of the Sydney Terminal building, former **Parcels Post Office** and Mortuary Station as **important and defining character elements in the streetscape.**” Maintaining the view of the Parcels Post Building from the east by simply floating another building above it is not a good heritage outcome.

² Central Precinct Draft Strategic Vision (October 2019), p.15

³ Central Precinct Draft Strategic Vision (October 2019), p.28

The visual montages provided do not demonstrate the true impact of the proposal on this building:

ANALYSIS OF PHOTOMONTAGES

VIEW 13 VIEW FROM LEE STREET SOUTH OF RAILWAY SQUARE (ADDITIONAL VIEW REQUESTED BY THE CITY OF SYDNEY)

EXISTING VIEW

The view is an axial view from Lee Street south of Railway Square approximately 100m south of the site. The view is predominantly constrained to the road corridor and includes the Railway Square shade structure on the left hand side, Adma building and parts of Henry Deane Plaza. The existing view composition includes the subject site and is terminated by the former literary office and the commercial buildings beyond.

PROPOSED VIEW INCLUDING THE REFERENCE DESIGN AS MODELLED

The Reference Design introduces a new tall, slim tower form into the mid-ground/view composition. The slim tower form proposed as indicated by the Reference Design is spatially separated from existing buildings and approved tower envelopes that are clustered within the Central Precinct. The existing built form blocks all views to Central Station and the Clock Tower as such the proposed tower envelopes have no impact on views to these items. Taller built form located in the Central Precinct will be visible in the context of the Central Precinct Tower cluster and as such will contribute to the contemporary visual landmark that is intended for Haymarket and the wider visual setting.

The proposed Reference Design sits within the proposed Tower Envelope and if constructed will not block views to or between heritage items, does not block access to scenic features or resources beyond the site and will predominantly block areas of open sky.

Table 14 Table of Visual Effects

EXISTING RATING OF VISUAL CONTEXT	VISUAL EFFECTS OF THE REFERENCE DESIGN ON THE EXISTING VIEW
Scenic quality and visual character - Low-medium	Low - medium
View Place Sensitivity and Viewer sensitivity - Low-medium	Low
View composition - Low-medium	Medium

EXISTING VIEW



Existing view looking north from Railway Square along Lee Street

PROPOSED VIEW



Proposed view view looking north from Railway Square along Lee Street

KEY PLAN

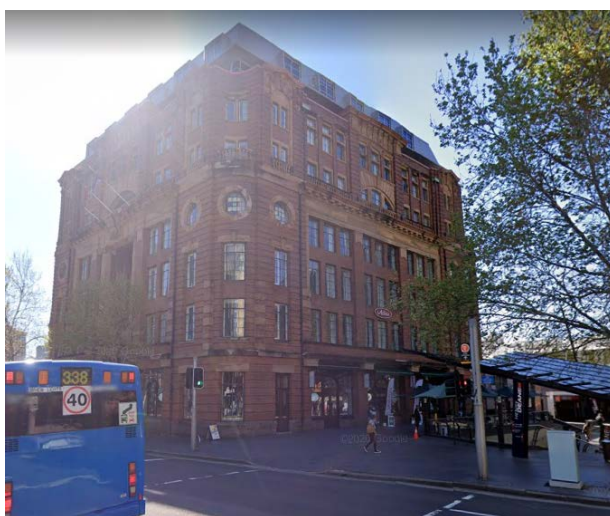


LEGEND

- Neighbouring Proposed & Approved Development Envelopes
- Proposed Reference Design

View analysis as presented, not indicating the true visual impact on the actual subject building facade (Source: Visual Assessment Report, Urbis, November 2020, p.24)

The above illustration shows the building already obscured by trees. A more useful view assessment would be from Railway Square itself, or from the Devonshire Street tunnel entry. The actual visual impact that the proposal will have can be garnered from the contrasting images below. Such studies should form part of this assessment, not specifically selected views of the building already obscured by trees and other structures.



Actual view of the Parcels Post Building (left) and the actual impact on the building indicating that the entire southern elevation will essentially be obscured (Source: Google Maps with National Trust overlay (left) and Visual Assessment Report, Urbis, November 2020, p.24 (right))

The Trust notes section 3.2.1 Heritage of the Draft Design Guide has the following objective:

“Development should appropriately respond to items of heritage significance within the sub-precinct and ensure items of heritage significance are maintained and celebrated wherever possible.”⁴

The Trust does not accept that this proposal is a good example of maintaining and celebrating the heritage significance of the Parcels Post building, at one of the great historic railway stations of the world.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'David Burdon', with a long horizontal flourish underneath.

David Burdon
Director, Conservation

⁴ Draft Design Guide Version 1 | Western Gateway Sub-precinct, p.17

David McNamara
Director - Eastern Harbour City
NSW Department of Planning, Industry and Environment
4 Parramatta Square
12 Darcy Street, Parramatta NSW 2150

28 January 2021

Dear Mr McNamara,

Draft Central Western Gateway Block C Rezoning Proposal | UTS Submission

This submission is made by the University of Technology Sydney (UTS) in relation to the rezoning proposal for Block C of the Western Gateway sub-precinct of the Central State Significant Precinct.

As a major landowner and stakeholder in the adjoining Innovation Corridor, UTS thanks the Department of Planning, Industry and Environment (DPIE) for the opportunity to comment on this latest proposal.

This submission builds on the earlier submission made by UTS on 27 November 2019 where it provided comments and feedback on both the then draft Strategic Vision for the Central Station Precinct and the Stage 1 rezoning proposal for the Western Gateway.

It is exciting to see the NSW Government's vision for Tech Central taking shape and UTS remains a strong advocate and supporter for the renewal of Central Station, including broadly the latest plans by Toga for Block C of the Western Gateway. While supportive, UTS wishes to reinforce previous detailed comments made in terms of pedestrian movement.

The unlocking of significant additional development capacity on the Block C site needs to ensure there is also the delivery of significant public benefits. Improved pedestrian connectivity and capacity both within and surrounding the Western Gateway precinct is considered to be a key outcome and public benefit that should be secured and delivered. Based on the Department's response to UTS's previous submission and the rezoning proposal for Block C, UTS has no certainty that such critical public benefits will be realised. The reference design in support of the Block C rezoning proposal for example simply retains and extends the existing Lee Street tunnel connection (i.e. status quo).

The significant increase in floor space in the Western Gateway, broader precinct and the provision of a vastly expanded and improved east-west connection across Central Station will significantly increase pedestrian movements through the Lee Street Tunnel. Without expansion and augmentation, the Lee Street Tunnel is likely to become a bottleneck and will serve to inhibit the free flow of pedestrians from Surry Hills through to Ultimo and beyond. UTS submits that commitments to improving or augmenting the Lee Street Tunnel must be required as a condition precedent to the rezoning of Block C and should be delivered as part of development of Block C.

UTS also reiterates previous comments around the need to commit and deliver early on an improvement to the current unsatisfactory termination of the Goods Line through its extension to Mortuary Station. Such a move will significantly improve legibility and the overall pedestrian experience while also opening up a continuous public domain link from Darling Harbour through Ultimo and beyond to Redfern and Surry Hills.

UTS thanks DPIE for the opportunity to comment on the rezoning proposal for Block C of the Western Gateway. UTS once again congratulates DPIE and Transport for NSW on the progress it has made on realising the exciting vision for Central Station and welcomes future opportunities to participate in the planning process for the precinct and the broader area.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Kara Krason', with a long horizontal flourish extending to the right.

Kara Krason

Head of Campus Planning and Design