

Transport for NSW

# Central Precinct Western Gateway Rezoning Proposal

Response to Submissions Report



July 2020 | FINAL

# Contents

1	Introduction .....	17
1.1	Background.....	18
1.1.1	Recent State Infrastructure Projects .....	18
1.1.2	Central Precinct State Significant Precinct Study .....	19
1.1.3	The exhibited Western Gateway Rezoning Proposal .....	21
2	Consultation.....	24
2.1	Community Engagement .....	24
2.2	Government Agency and Stakeholder Engagement.....	24
2.3	Public Exhibition of the Western Gateway Rezoning Proposal.....	25
3	Overview of submissions .....	27
3.1	Key Community Feedback .....	27
3.2	City of Sydney Council .....	28
3.2.1	Issues raised in submission .....	28
3.3	Government Agencies .....	29
3.3.1	Heritage NSW .....	29
3.3.2	Environment, Energy and Sciences Group (Formerly Office of Environment and Heritage).....	30
3.3.3	Sydney Local Health District .....	30
3.4	Non-government agencies .....	30
3.4.1	University of Technology Sydney .....	30
3.4.2	The National Trust.....	30
3.4.3	Property Council NSW .....	31
3.4.4	YHA Australia .....	31
3.5	Project Review Panel .....	31
4	Response to key issues raised .....	35
4.1	Land Use .....	35
4.1.1	Enhance emphasis on technology and innovation.....	35
4.2	Heritage .....	36
4.2.1	Responding to existing heritage.....	36
4.2.2	Integration of heritage values in the public domain strategy.....	39
4.2.3	Aboriginal culture and heritage .....	40
4.2.4	Site-specific conservation management plans.....	41
4.2.5	Physical impacts to heritage items.....	42
4.2.6	Consultation with Heritage Council .....	43
4.3	Movement, access, and public spaces.....	44
4.4	Built form.....	48
4.4.1	Block A and Block B building separation .....	48
4.4.2	Building height and floor space ratio .....	49
4.4.3	Building setbacks .....	51
4.5	Amenity.....	53
4.5.1	Overshadowing .....	53
4.5.2	Wind Impacts.....	54
4.6	Sustainability.....	60
4.7	Design Quality .....	67
4.7.1	Competitive design process .....	67
4.7.2	Active frontages .....	68
4.7.3	Building efficiencies.....	69
4.8	Infrastructure planning and contributions .....	71
4.9	Planning objectives and priorities .....	73

5	The Revised Proposal .....	76
5.1	Revised Concept Proposal for Block A and Block B .....	76
5.1.1	Block A .....	76
5.1.2	Block B .....	76
5.2	Amendments to the rezoning proposal.....	78
5.2.1	Winter Gardens and impact on gross floor area controls .....	78
5.2.2	Statutory weight of the Western Gateway Design Guide.....	81
5.3	Amendments to the Western Gateway Design Guide.....	82
6	Conclusion .....	98
6.1	Next Steps .....	98
7	Response to submissions table.....	99

## List of Figures

Figure 1.	Central Precinct Preliminary Precinct Plan (as revised).....	20
Figure 2.	Central Precinct and Western Gateway sub-precinct (shown in orange) .....	22
Figure 3.	Western Gateway sub-precinct with delineated block ownership .....	23
Figure 4.	Breakdown of submissions received during exhibition period.....	27
Figure 5.	Key public spaces in the Western Gateway sub-precinct .....	46
Figure 6.	Results of wind testing analysis for Block A .....	56
Figure 7.	Results around areas between Blocks A and B with 30 metre spacing between towers (Left), and with localised amelioration measures (Right) .....	57
Figure 8.	Results around south-west corner of existing conditions (Left), with 6 m setback to Lee Street (Centre), and with 6 m setback and amended geometry (Right) .....	57
Figure 9.	Existing wind conditions compared to results around cumulative wind assessment with Blocks A and B .....	58
Figure 10.	Appropriate wind comfort criterion map for the Western Gateway sub-precinct..	59
Figure 11.	Delineation of naturally ventilated space (Zone C), naturally ventilated with mechanical control (Zone B), and innovatively mechanically ventilated space (Zone A) ..	78
Figure 12.	Existing wind conditions compared to results around cumulative wind assessment with Blocks A and B .....	79
Figure 13.	Artist's impression of proposed wintergarden atrium spaces in Block A.....	79

## List of Tables

Table 1.	Response to City of Sydney recommended sustainability targets .....	62
Table 2.	Proposed public works to be delivered in-kind by Block A and Block B .....	71
Table 3.	Response to specific objectives and planning priorities in the Greater Sydney Region Plan and Eastern City District Plan.....	74
Table 4.	Summary of amendments to Western Gateway Design Guide.....	82

## List of Attachments

**Appendix A** – Western Gateway Design Guide

**Appendix B** – Western Gateway Public Domain Strategy

**Appendix C** – Central Precinct Strategic Framework

**Appendix D** – Block A Response to Submissions Package

**Appendix E** – Block B Response to Submissions Package

# Acronyms

ATSI	Aboriginal and Torres Strait Islander
1 percent AEP	Statistical flood event occurring once every 100 years
BBWQIP	Botany Bay and Catchment Water Quality Improvement Plan
BASIX	Building Sustainability Index
CPTED	Crime Prevention Through Environmental Design
DCP	Development Control Plan
DPIE	Department of Planning, Industry and Environment
EPA	Environment Protection Authority
ESD	Ecologically Sustainable Development
FSR	Floor Space Ratio
GSC	Greater Sydney Commission
HTS	Household Travel Survey
JTW	Journey to Work
LEP	Local Environmental Plan
Metro	Sydney Metro
OEH	NSW Office of Environment and Heritage
PMF	Probable Maximum Flood
PRP	Project Review Panel
Proposal	Western Gateway Rezoning Proposal
RMS	Roads and Maritime Services
SEPP	State Environmental Planning Policy
SLHD	Sydney Local Health District
SMCMA	Sydney Metropolitan Catchment Management Authority
SR	Study Requirements
SSD	State Significant Development
SSP	State Significant Precinct
SSA	Social Sustainability Assessment
Sydney	Greater Sydney Metropolitan Area
TOD	Transit Oriented Development
UTS	University of Technology Sydney
WGDG	Western Gateway Design Guide
WSUD	Water Sensitive Urban Design

<b>Author:</b>	Ben Craig (Director), David Attwood (Principal Planner), Prugya Maini (Urbanist)
<b>Date:</b>	17 June 2020
<b>Version:</b>	FINAL
<b>Review date:</b>	10 July 2020

## Executive Summary

Transport for NSW is exploring opportunities to revitalise Central Precinct. The vision for the Central Precinct is for its evolution into a vibrant and exciting place that unites a world-class transport interchange with innovative businesses and public spaces. It will connect the city at its boundaries, celebrate its heritage and become a centre for the jobs of the future and economic growth.

Forming part of this vision for the Central Precinct is the Western Gateway sub-precinct, which has been identified as the first sub-precinct for renewal within the broader Central Precinct State Significant Precinct (Central Precinct SSP). The Western Gateway sub-precinct comprises the Sydney Railway Square YHA site (referred to as Block A), the commercial office block at Lee Street, Haymarket (Henry Deane office block) (referred to as Block B) and the Adina Apartment Hotel and the Henry Deane Plaza (referred to as Block C).

The Western Gateway sub-precinct represents a unique city shaping opportunity to kick-start this renewal initiative and deliver a significant amount of new employment floorspace that will enable Central Sydney to expand to the south and continue to perform its role as the economic powerhouse of NSW and Australia. This will also enable the rethinking of the western interface of Central Station as more than a 'point of transit' to access transport infrastructure, but as a 'place' and 'destination' within Central Sydney.

Central Station will evolve in the near future to integrate Sydney Metro services, the Sydney CBD and South East Light Rail and Central Walk (refer to Figure 2). The proposal for the Western Gateway sub-precinct, in collaboration with these planned and committed transport upgrade projects, presents a rare opportunity to catalyse broader transformational change. This change is needed to reinvigorate the southern edge of the city into a new, vibrant, exciting, socially inclusive and environmentally sustainable place for workers, visitors and the community.

To see out this vision, Transport for NSW has prepared a draft State Environmental Planning Policy (SEPP) report to facilitate the proposed rezoning of the Western Gateway sub precinct (the site), by way of an amending SEPP, in line with Section 3.29 of the Environmental Planning and Assessment Act 1979 (EP&A Act). The proposed rezoning seeks to amend the Sydney Local Environmental Plan 2012 (SLEP 2012) planning controls as they relate to the Western Gateway to facilitate the future redevelopment of the Western Gateway sub-precinct as the first stage of the renewal program for the broader Central Precinct. The proposed amendments seeks to:

- Amend the Sydney LEP 2012 by introducing a site-specific provision for the sub-precinct that:
  - incentivises development for non-residential uses through the provision of greater allowances for building height and gross floor area controls.
  - requires a competitive Design Excellence process that has been approved by the NSW Government Architect, in addition to Council's existing policy; include reference to Design Guidelines to inform future development of the sub-precinct and enable the arrangements for the provision of State infrastructure.
- Amend the Sydney LEP 2012 maps to:
  - apply the B8 Metropolitan Centre zone to the entire Western Gateway sub-precinct;
  - remove the Western Gateway sub-precinct area from the Special Character Areas Map; and



- identify the Western Gateway sub-precinct on the Locality and Site Identification Map Foreshore Building Line Map – including the labelling of Blocks A, B & C within the sub-precinct.

The rezoning proposal is supported by a Draft Design Guide which provides site-specific design objectives and guidelines for the Western Gateway sub-precinct. The Design Guide will be given statutory weight through a new site-specific provision that is proposed to be included in Division 5 of the SLEP 2012, and together with the LEP provision will provide a framework to guide and assess future development applications.

The Department of Planning, Industry and Environment (DPIE) will consider the proposed amendments to the current planning controls for the Western Gateway sub-precinct alongside the exhibited Draft Strategic Vision to ensure that the proposed changes to planning controls are consistent with the overarching vision, themes and principles outlined for the broader Central Precinct and the Western Gateway sub-precinct.

The Western Gateway Rezoning Proposal was publicly exhibited over a six-week period between 17 October 2019 and 27 November 2019. 28 submissions were received in response from community members, State government agencies, the City of Sydney Council and non-government organisations.

The purpose of this report is to respond to the key issues raised by the submissions identified below (detailed responses are provided in Section 4 of this report provides), including:

- Strategic land uses
- Heritage
- Movement, access, and public spaces
- Built form
- Amenity, including wind and overshadowing
- Sustainability
- Design quality
- Infrastructure contributions
- Planning objectives and priorities

## Response to key issues

Consideration of submissions has focussed on providing additional clarity, design guidance, technical assessment and consideration to key concerns raised, including through amendments to the proposed building envelopes, and proposed planning framework.

Importantly, the Western Gateway sub-precinct seeks to achieve the success of a globally recognised innovation and technology-based business hub in addition to providing other strategic land uses within the sub-precinct, whilst ensuring the appropriate protection and celebration of heritage and function of Central Station as the as the busiest transport interchange in NSW. Where considered necessary, responses have been informed by the input of technical experts. This Response to Submissions Report must be read in conjunction with the supporting documentation provided within **Appendices A to E**.

The following provides an overview of how submissions on key issues and key parts of the Western Gateway Design Guide have been addressed.

## Land Use

Overall, submissions reflect strong support for technology and innovation uses within the Western Gateway sub-precinct. The City of Sydney Council noted that the draft SEPP should encourage a strong emphasis on innovation and technology-based businesses and other strategic land uses in future site-specific development proposals in the Western Gateway sub-precinct.

The proposed B8 Metropolitan Centre zoning permits a wide range of employment, innovation and technology business uses, while also allowing for a diversity of compatible land uses characteristic of Sydney's global status that serve the workforce, visitors and wider community. This is considered the most appropriate zoning to deliver innovation and technology-based businesses and other strategic land uses in the Western Gateway sub-precinct.

Furthermore, the Western Gateway Rezoning Proposal intends to implement a site-specific clause for alternate building height and gross floor area controls (despite Clauses 4.3 and 4.4 of the Sydney LEP 2012), where development is for the purposes of non-residential land use only. This will ensure future development in the sub-precinct will have a focus on employment generating uses, such as innovation and technology business uses.

## Heritage

### Responding to heritage

Submissions raised the need for future development to appropriately respond to the heritage significance of Central Station and its surrounds. Technical advice has been sought from heritage specialists by the proponents of both Block A and Block B, to respond to the specific concerns raised in relation to the proposed building envelopes and intended detailed design considerations.

It is considered that the framework for assessment of future DAs in the Western Gateway sub-precinct will provide a robust tool for the future assessment of the built form to manage potential impacts. This framework will include:

- Clause 5.10 of the Sydney LEP 2012
- The guidelines of the Western Gateway Design Guide that relate to heritage
- The site-specific Conservation Management Plan that is being prepared to support the future DA for Block A which will respond to its site specific heritage context to ensure that the heritage values of the place and its individual elements are recognised and respected
- The Heritage Design Guidelines (prepared by GML Heritage) (refer to **Appendix E Annex J** of the exhibited Rezoning Proposal) prepared for Block B which provide guidance on how to respond to the existing heritage context.

### Integration of heritage values in the public domain strategy

A Public Domain Strategy has been prepared for the Western Gateway sub-precinct (refer to **Appendix B**), to ensure a coordinated and comprehensive approach to delivering the public domain. The principles of the Public Domain Strategy, relating to heritage include:

- Strong connectivity with heritage built form
- Robust and finely detailed materials to respond to heritage materiality
- Activate heritage façades
- Heritage interpreted in the public domain

This will ensure heritage values will be integrated into the future public domain.



#### *Celebrating aboriginal heritage*

Heritage interpretation plans will be prepared to ensure that the significance of the Western Gateway sub-precinct and the broader Central Precinct is interpreted and understood. This interpretation strategy and plan will be prepared by an appropriately qualified consultant specialising in the curation of meaningful and successful heritage interpretation media, and will form part of the future DAs for Block A and Block B. This will ensure Aboriginal Heritage will be assessed alongside any future development proposal in the Western Gateway sub-precinct.

#### *Physical impacts to heritage items*

The proposal for Block A seeks to substantially integrate the existing inward parcels shed as part of the new building design. It is proposed that the existing shed building will be carefully dismantled and stored during ground works for the new Atlassian tower, and then reconstructed as part of the development. The shed building will provide key arrival and gathering spaces within the new development maximising the activation and interpretation opportunities for this space.

Block B does not contain any identified heritage items and as such the proposal for this part of the sub-precinct will not result in any physical impacts to known heritage items. The proposal also does not seek any amendments to Block C within the sub-precinct and as such does not involve any proposed controls that would have any physical impacts on the former Parcels Post Office Building

It is noted however that new building mass will affect the visual setting of heritage buildings within and surrounding the sub-precinct. With this in mind the framework proposed for the Western Gateway sub-precinct has been prepared to work together with other existing controls to ensure a robust set of principles to minimise any potential visual impacts to the heritage values of Central Station and its surrounding heritage items.

#### *Consultation with Heritage Council*

A meeting was held with the NSW Heritage Council on 1 April 2020 regarding the Central Precinct Renewal Project. At this meeting, the Heritage Council indicated broad support for the proposed renewal project and acknowledged the need for renewal to occur in the area. The Heritage Council highlighted the importance of taking into account the state heritage management principles during the project and encouraged engagement with the relevant Aboriginal cultural heritage advisers when further developing plans for the precinct. It is noted that this will occur as part of the Stage 2 State Significant Precinct planning process.

Subsequent to this, a further meeting was held with the NSW Heritage Council on 6 May 2020 on the Western Gateway sub-precinct. During this meeting the proponents for Block A and Block B provided an update to the NSW Heritage Council on their respective projects with regards their vision, the proposed massing, and the anticipated program for further detailed planning.

During this meeting both Transport for NSW and the proponents for Blocks A and B outlined the consideration of heritage that had been given to date and made commitments to continued engagement with the NSW Heritage Council throughout the next stages of the redevelopment, including detailed design, development application and staging. In response to this meeting the NSW Heritage Council noted the excellent engagement of both the proponents and resolved to establish a working party so that they could get regular updates on the progress of the projects. The next step in this process is an agreement between the proponents and the Heritage Council to have further design briefing meetings in July, as well as subsequent ongoing consultation.

## **Movement, access and public spaces**

### *Delineation of useable public space from vestigial publicly accessible spaces*

To delineate public spaces within the Western Gateway sub-precinct, a Public Domain Strategy has been prepared which provides a holistic overview of the public domain aspirations for the sub-precinct. The public domain strategy will align with the objectives and guidelines set out within the Western Gateway Design Guide. A copy of the Public Domain Strategy is provided at **Appendix B**.

### *Location of end of trip facilities*

Transport for NSW do not consider it necessary to mandate the need for end of trip facilities to be located adjacent to main foyer entrances within the Western Gateway. These facilities will be more appropriately located where it best serves the functionality of the building and its users, which may or may not be adjacent to foyer entrances. Potential locations for end of trip facilities will be explored during the detailed design development phase.

### *Overarching transport strategy for the Western Gateway sub-precinct*

The exhibited rezoning packages for Block A and B, both contained a Transport, Traffic, Pedestrian and Parking Report, which both outline the approach to managing traffic impacts, servicing, car parking, staging and managing pedestrian and vehicular access. Importantly, the Transport, Traffic, Pedestrian and Parking Report for Block B considers the proposed movement arrangements for both Blocks A and B to ensure there is a consistent approach between both proposals. Transport for NSW consider that these reports appropriately outline the overall approach to traffic management for the purposes of the rezoning stage for the Western Gateway sub-precinct. Further details of traffic management, including the preparation of an overarching transport strategy for the sub-precinct, will be considered at the development application stage.

### *Cyclist and pedestrian access and safety at-grade*

The Western Gateway Rezoning Proposal details significant improvements proposed to pedestrian and cycling connections and facilities as part of the Block B proposal. These improvements align with the controls in the Draft Design Guide which are aimed at ensuring that development in the Western Gateway sub-precinct results in a high quality, integrated, permeable and accessible pedestrian and cycle network that gives priority to future pedestrian and cyclist movement.

## **Built form**

### *Block A and Block B building separation*

Submissions raised that building separation distances and setback requirements are to better address the interface with surrounding heritage buildings and streets and public spaces, maintain view corridors and address wind issues. The panel recommended that the proposals adopt a minimum 30m clear separation between the planning envelopes of Block A and B and specified that the additional separation to achieve the 30m should be accommodated on Block B.

In response to this issue, the draft Design Guide for the Western Gateway has been amended to specify a minimum 30 metre separation Blocks A and B. The proponent for Block B acknowledge and support recommendation to accommodate additional building separation without the loss of GFA. The 30m has been accommodated within Block B.

### *Building height and floor space ratio*

General concerns were raised regarding the proposed maximum building heights and floor space ratios in relation to the surrounding heritage items and overall character of the area.

Renewal of the Western Gateway sub-precinct and the broader Central Precinct will represent a natural extension of the southern CBD and capitalise on the fact that Central Station is the most connected destination in Greater Sydney and strategically positioned to accommodate future job and population growth. This is reflective of the draft Central Sydney Planning Strategy, which proposes to introduce a new planning pathway for height and densities to go beyond the established maximum limits to increase growth opportunities in employment floorspace and deliver innovative design.

Like other parts of Central Sydney, there are a number of sensitive heritage buildings which sit adjacent to and are co-located next to areas of taller building forms. Indeed, this is the case in most global cities which have a rich built heritage. In all these cases, there is an onus on providing an appropriate planning and heritage framework to carefully manage and assess these relationships, and ensure that contemporary developments respond sensitively, and indeed positively to this context. While no specific amendments are proposed to the building envelopes in response to existing heritage items, through the adoption of the Western Gateway Design Guide, and its application in conjunction with existing heritage and planning controls and the rezoning proposal, will ensure that a robust framework to minimise any potential visual impacts to the heritage values of Central Station and its surrounding heritage items.

#### Building Setbacks

The City of Sydney has suggested that setback requirements should better address interface with surrounding heritage buildings and streets and public spaces, maintain view corridors and address wind issues. The Project Review Panel recommended a minimum 6 metre setback above the podium along the Lee Street frontage, to minimise wind impacts through the building envelope design.

In response to this, further testing was undertaken to identify the most effective design solution to improve wind conditions whilst maintaining the tower envelope and keeping within the envelope controls. The outcome of this testing confirmed that the most effective strategy for mitigating wind impacts along Lee Street was to block the southern colonnade of the building on Block B and wrap an awning around the buildings south-west corner to Lee Street. With these amelioration measures, the wind conditions around the south-west corner were improved to be better than the existing conditions and maintained similar conditions along Lee Street.

While the results of the technical analysis confirm that the 6 metre upper level setback is ineffective at improving wind conditions, the proponents for Block B acknowledge the concerns raised by City of Sydney and PRP. It is therefore proposed to introduce a minimum 6 metre upper level setback requirement along Lee Street within the Western Gateway Design Guide, but include design guidance that allows for that 6 metre setback to be reduced to a minimum of 3 metres where it can be demonstrated that:

- the podium is set forward of the tower façade line
- any future building on Block B is designed to visually read in the streetscape as a building of two parts, including a podium structure with a tower above
- the wind environment on the ground plane and in affected public domain areas is appropriate for its intended use
- effective articulation and modulation of the podium design is achieved.

Such an approach will enable setbacks along Lee Street to be tested through the design competition process, and will provide sufficient to facilitate an innovative architectural response, provided the evidence demonstrates that wind impacts at ground level on Lee Street are appropriately managed.

## **Amenity**

### Solar access to Prince Alfred Park

Overshadowing of Prince Alfred Park between 12pm and 2pm is currently prohibited under Clause 6.19 (h) of the SLEP 2012. This provision of the SLEP 2012 aims to protect the amenity of key open space assets within the city. The Western Gateway Rezoning Proposal does not propose to amend Clause 6.19 (h) of the SLEP 2012, which will retain the existing level of sun access protection to Prince Alfred Park.

Notwithstanding this, the City of Sydney's draft Central Sydney Planning Strategy (CSPS) and Planning Proposal proposes to strengthen the sun protection controls for Prince Alfred Park, extending the period of sun access protection to 10.00am - 2.00pm all year round. The proposals for Block A and B have adopted the sun access protection provisions of the Draft CSPS to inform the proposed building envelopes and proposed amendment to building height provisions.

### Solar access to Henry Deane Plaza

As the objectives and intent of the proposed rezoning are to facilitate comprehensive renewal of the Western Gateway sub-precinct, it is likely that Henry Deane Plaza will be affected by some overshadowing under the proposed future developed scenario. Transport for NSW therefore consider that any guideline should appropriately balance the retention of daylight and solar amenity to Henry Deane Plaza with the overarching intention and objectives for the Western Gateway as the first stage in the broader Central Precinct and the catalyst for Tech Central (previously known as the Sydney Innovation and Technology Precinct). The Western Gateway Design Guide has therefore been drafted to include a solar access provision that seeks to ensure that Henry Deane Plaza will continue to receive an appropriate level of solar amenity for its intended use.

### Wind impacts

The City of Sydney raised that wind mapping and appropriate wind mitigation built into the building envelope must be provided. The Project Review Panel recommended that wind impacts generated by the proposals need to be addressed at the rezoning stage through changes to the proposed building envelope massing.

Further detailed cumulative wind testing under a developed scenario for Blocks A and B was undertaken of the proposal in response to the matters raised by the City of Sydney and the Project Review Panel, and confirmed that:

- An acceptable wind environment can be achieved around Block A including the Western Forecourt and the proposed through site link between Blocks A and C.
- Acceptable wind conditions can be achieved at the Lee Street corner of Block B through architectural treatments including closure of the southern colonnade and wrapping an awning around the building's south-west corner.
- A 30m building separation combined with the inclusion of a roofed terrace pavilion between Block A and B, and an awning along the eastern façade of Block B, will deliver a wind environment that supports standing and sitting within the area between Blocks A and B.

Overall, the cumulative impacts of Block A and Block B developments have been assessed and can meet appropriate wind comfort and safety conditions for the intended use of the spaces, without reliance on temporary structures to mitigate wind impacts. Architectural interventions (at DA stage) provide the greatest form of mitigation and ability to achieve acceptable wind comfort and safety criteria for the intended purpose.

In addition, it is noted that the final form of proposed buildings on Blocks A and B will be smaller than and contained within the proposed building envelopes (which have been tested in this scenario) and will also include additional detailed design elements that will

further assist with mitigating wind impacts beyond that modelled for the purpose of this rezoning proposal.

Finally, both proponents are committed to undertaking further detailed wind modelling as part their future detailed DA(s), where detailed testing will be undertaken on resolved scheme designs after completion of the competitive design processes for Blocks A and B. The requirement for this detailed testing is clearly set out and mandated in the Western Gateway Design Guide.

### **Sustainability**

Submissions sought to further the sustainability targets for the sub-precinct, to be more globally competitive, and to act as a benchmark for best practice ESD approach. This includes higher ESD performance targets, commitments to reducing waste and single use plastic in the precinct, achieving a net zero emissions target and sustainable water management.

Both proponents for Block A and Block B are committed to delivering a high benchmark in sustainable development, and generally support additional emphasis on ensuring sustainable development. While not all such commitments can feasibly be made at this early stage of the planning process, additional emphasis has been incorporated within the Western Gateway Design Guide wherever possible in response to submissions received.

### **Design quality**

A number of submissions recommended design guidance, including for building envelope efficiencies, active frontages, and clarifications relating to requirements of the competitive design process.

#### Competitive design process

The Western Gateway Design Guide has been updated to provide greater clarity on design excellence and the competitive design process for new development in the Western Gateway sub-precinct. Specifically, it clarifies that the competitive design process is to be undertaken in accordance with the City of Sydney Competitive Design Policy, where nominated, or in accordance with the relevant guidelines of the Government Architect NSW. Furthermore, the reference to involving no less than four (4) competitors has been amended to now refer to the need for a minimum of five (5) competitors, with no more than 50% being from international practices. Clarity has also been provided that no additional bonus floorspace or height will be awarded for buildings achieving design excellence, as this has already been factored into the maximum gross floor areas for the sub-precinct.

#### Active frontages

Transport for NSW agrees that activation of the public domain is intrinsic to the overall project. However, it should be recognised that portions of ground frontage for Blocks A and B cannot be activated as they perform an access, servicing and maintenance function. To provide greater flexibility the Western Gateway Design Guide has been amended to require active frontages where possible and practicable along the public domain.

#### Building efficiencies

The City suggest that the Draft 'Western Gateway Design Guide' should be amended to provide stronger guidance on building efficiencies which ensure building massing and envelopes provide flexibility for articulation and other design features in subsequent detailed design stages (i.e. applying 75-80% per cent envelope efficiencies to ensure that building massing and envelopes provide flexibility for articulation and other design features in subsequent detailed design stages).



In response to this the Western Gateway Design Guide has been amended to include a definition of Gross Building Area (GBA) as well as a new control that requires a maximum Gross Floor Area (GFA) to Gross Building Area (GBA) ratio of 80%. This equates to ensuring an envelope efficiency of the level recommended by the City of Sydney. This will address the matters raised in the submissions whilst still providing sufficient allowance to implement articulation and other design features in subsequent detailed design stages.

### **Infrastructure planning and contributions**

The City of Sydney's submission raised that infrastructure needs for the Western Gateway sub-precinct should be determined prior to considering any uplift and changes to the planning controls. A holistic consideration of both State and local infrastructure should include needs assessment and a framework for contributions and timely delivery.

The Western Gateway sub-precinct has been accelerated by the NSW Government, with the Western Gateway identified by the Minister as being appropriate for early assessment and consideration in advance of the broader Central Precinct Renewal Program. The proposal for Blocks A and B will be making a significant contribution to the Western Gateway sub-precinct through a package of public works, including but not limited to new high quality public domain, links to the future over station development and an integrated basement and distribution facility for the broader Central Precinct. Together these works will provide a pivotal catalyst function in delivering the NSW Government's strategic planning outcomes for the Central Precinct.

The above public works for Blocks A and B will be largely delivered via works in kind, and proposed to be formalised through an agreement with the NSW Government. In addition to these works in kind, the Western Gateway Rezoning Proposal will commit to paying monetary contributions to the City of Sydney in accordance with the current Section 61 Contributions Plan and delivering public art as part of any future development consent.

The collective benefit of the works in kind package, Section 61 and public art contributions offers a total value exceeding the local contributions City of Sydney could expect to receive under a traditional development application process by a significant margin.

### **Planning objectives and priorities**

It was recommended that this Response to Submissions report should provide more assessment of the proposal in relation to a list of objectives and planning priorities in the Greater Sydney Region Plan and Eastern City District Plan. Detailed responses to the following objectives and planning priorities have been addressed within this report:

- Consideration of a range of initiatives to address affordable rental housing (Objective 11);
- Consultation with Local Aboriginal Lands Councils (Planning Priority E4);
- Investigation of opportunities for precinct-based provision of adaptable car parking and infrastructure (Objective 12, Planning Priority E6);
- Identification and conservation of heritage (Planning Priority E6);
- Strengthening international competitiveness of the Harbour CBD and growing its vibrancy (Planning Priority E7);
- Delivering integrated land use and transport planning and a 30-minute city (E10); and
- Supporting growth of targeted industry sectors, in particular tourism and visitation and night time economy (Planning Priority E13).



## The revised Proposal

### The revised Concept Proposal

#### Block A

Following the release of the draft planning controls, Atlassian has undertaken a competitive design process which concluded in late December 2019. The design competition winning scheme for Block A has been developed further in close consultation with the climate engineers to create a living and breathing building, with a highly adaptive workspace for future occupants, entirely within the planning envelope exhibited. A critical part of this has been the design of a series of atrium spaces. These spaces are a function of the building's broader natural ventilation strategy which seeks to reduce the reliance on conventional air-conditioning systems and minimise carbon footprint.

Given the building envelope is fixed and the climate engineering is being resolved internally (within the envelope) there is no impact on urban design, structural and spatial requirements or any change in the way the building sits or is perceived in the public realm.

#### Block B

The Consortium has revised its proposal for Block B to respond to feedback received during the public consultation process and ensure stronger alignment with the Architectural Design Competition. The proposed amendments to the Block B Concept Proposal, include:

- **Terrace Pavilion** - prior to the operation of the over station development (OSD) portion of the Central Precinct, the northern edge of Block B risks being an unused and unsafe 'left over space' in the interim, if not appropriately designed and activated. In the longer term, this space could be modified to accommodate the new pedestrian flows and complement the future vertical transport proposed to connect Henry Deane Plaza with the proposed OSD land bridge. The Pavilion is to be designed as a publicly accessible and programmable space that is protected from wind and noise conditions, allowing for enhanced amenity, usability and activation - including retail, commercial and community uses. The Pavilion's roof structure will partially enclose and protect the spaces whilst being a structure that is impressive in its design and shape.
- **Increased building separation of 30 metres** - In response to the issue of inadequate building separation between Block A and Block B, as raised by the City of Sydney and the Project Review Panel, the draft Design Guide for the Western Gateway has been amended to specify a minimum 30 metre separation between Blocks A and B. The proponent for Block B acknowledge the recommendation to accommodate the additional building separation without any loss of GFA. The 30m has been accommodated within Block B.
- **Provided an above podium setback to Lee Street** – In response to the concerns raised about the above podium setback to Lee Street, it is proposed to introduce a minimum 6 metre upper level setback requirement along this frontage within the Western Gateway Design Guide. The design guidance will however allow for this 6 metre setback to be reduced to a minimum of 3 metres where it can be demonstrated that:
  - the podium is set forward of the tower façade line
  - any future building on Block B is designed to visually read in the streetscape as a building of two parts, including a podium structure with a tower above
  - the wind environment on the ground plane and in affected public domain areas is appropriate for its intended use
  - effective articulation and modulation of the podium design is achieved.

- **Adjustment to podium height** – The maximum podium height has been slightly adjusted from RL 63 to RL63.8 as shown in the Western Gateway Design Guide.

The Draft Design Guide has been revised to reflect the amended Block B building envelope (refer to **Appendix A**).

### **The revised Rezoning Proposal**

In response to the revised Concept Proposal, the proposed SEPP amendment has been revised to include some additional amendments, these being:

- inclusion of a new provision that allows for the inclusion of additional floorspace to be used for the purpose of providing wintergarden spaces within the Western Gateway sub-precinct.
- a new provision within the site specific LEP clause that gives statutory weight to the Western Gateway Design Guide in the consideration of future development applications. This amendment is required to ensure that all future development applications, whether they be assessed under Part 4 or Part 5 of the Environmental Planning and Assessment Act 1979, are required to consider and respond to the provisions of the Western Gateway Design Guide.

### **The revised Western Gateway Design Guide**

The key amendments of the Western Gateway Design Guide (refer to **Appendix A**) in response to the submissions received, include:

- Insertions to further emphasise objectives of a technology and innovation focus within the sub-precinct
- Adjustments and insertions have been made to design guidance to clarify matters raised in submissions, such as the competitive design processes, applicability of the Sydney DCP 2012 and pedestrian access and public spaces
- Amendments have been made to provide additional guidance in relation to matters raised in submissions such as vehicular access pre and post construction completion and sustainability standards and targets

## **Next steps**

DPIE will now consider all submissions and community feedback, and this Response to Submissions Report, to finalise its assessment of the Western Gateway Rezoning Proposal. DPIE will then prepare an assessment report in consultation with the City of Sydney Council. The Project Review Panel will also consider the assessment report to determine consistency with its recommendations.

Once the assessment report has been finalised, the Minister for Planning and Public Spaces will consider the assessment report, and any report from the Project Review Panel, to make a determination about the Western Gateway Rezoning Proposal. If approved, the proposed amendments to the planning controls are expected to be adopted into the Sydney LEP 2012, and subsequent development applications may be assessed by the relevant planning authority using the new planning controls.

Community members who have registered for updates on the Department's Central Precinct webpage will be kept up-to-date by email communications.

# 1 Introduction

---

Transport for NSW is exploring opportunities to revitalise Central Precinct. The vision for the Central Precinct is for its evolution into a vibrant and exciting place that unites a world-class transport interchange with innovative businesses and public spaces. It will connect the city at its boundaries, celebrate its heritage and become a centre for the jobs of the future and economic growth.

Forming part of this vision for the Central Precinct is the Western Gateway sub-precinct, which has been identified as the first sub-precinct for renewal within the broader Central Precinct State Significant Precinct (Central Precinct SSP). The Western Gateway sub-precinct comprises the Sydney Railway Square YHA site (referred to as Block A), the commercial office block at Lee Street, Haymarket (Henry Deane office block) (referred to as Block B) and the Adina Apartment Hotel and the Henry Deane Plaza (referred to as Block C).

The Western Gateway sub-precinct represents a unique city shaping opportunity to kick-start this renewal initiative and deliver a significant amount of new employment floorspace that will enable Central Sydney to expand to the south and continue to perform its role as the economic powerhouse of NSW and Australia.

Redevelopment of the Western Gateway sub-precinct will also enable the rethinking of the western interface of Central Station as more than a 'point of transit' to access transport infrastructure, but as a 'place' and 'destination' within Central Sydney. As Central Station evolves in the near future to integrate Sydney Metro services, the Sydney CBD and South East Light Rail and Central Walk (refer to Figure 2), the proposal for the Western Gateway sub-precinct, in collaboration with these planned and committed transport upgrade projects, presents a rare opportunity to catalyse broader transformational change. This change is needed to reinvigorate the southern edge of the city into a new, vibrant, exciting, socially inclusive and environmentally sustainable place for workers, visitors and the community.

To see out this vision, Transport for NSW has prepared a draft State Environmental Planning Policy (SEPP) report to facilitate the proposed rezoning of the Western Gateway sub precinct (the site), by way of an amending SEPP, in line with Section 3.29 of the Environmental Planning and Assessment Act 1979 (EP&A Act). The proposed rezoning seeks to amend the Sydney Local Environmental Plan 2012 (Sydney LEP 2012) planning controls as they relate to the Western Gateway to facilitate the future redevelopment of the Western Gateway sub-precinct as the first stage of the renewal program for the broader Central Precinct. The amendments to the planning controls are proposed via the creation of a new site-specific clause under Division 5 of the SLEP 2012.

The Western Gateway Rezoning Proposal was publicly exhibited over a six-week period between 17 October and 27 November 2019, during which 28 submissions were received on the proposal from community members, State government agencies and the City of Sydney Council.

This Response to Submissions Report provides a response to the key issues raised by submissions during the public exhibition period, and outlines any proposed amendments to the Western Gateway Rezoning Proposal, if necessary. A summary of all submissions and responses can be found within **Appendix A** of this report.

## 1.1 Background

Located within the heart of Sydney City, Central Station is New South Wales' (NSW) largest and busiest transport hub servicing nearly 270,000 customers daily. It is the anchor of NSW's rail network, providing 24 platforms for suburban, intercity and interstate connections. It also caters for light rail, bus, coach and taxi connections, and will provide for new Sydney Metro services once operational.

Central Station also competes on a global scale. Through the T8 Airport Line it provides a direct link to Kingsford Smith Airport – Sydney's main point of arrival for international visitors. The distance (seven kilometres) and average travel time (13 minutes) between Kingsford Smith Airport and Central Station, and by association the Sydney CBD, is superior compared to other global cities such as New York, Paris and Tokyo. Given the importance that high value business places on accessibility, the location of Central Station and its proximity to international gateways provides Sydney with a source of sustainable long-term competitive advantage.

Central Station and its immediate surrounds are also the most highly accessible and well connected of places in NSW. The grandeur of the main terminal building, the concourse and the clock tower along with the historical and social significance of the broader place makes Central Station and its surrounds, a highly unique and important cultural location within Sydney.

On 15 September 2016, the Minister for Transport and Roads announced the Government's intention to revitalise and transform Central Station into a world class transit hub. An opportunity to revive the surrounding areas around Central Station in conjunction with station upgrade projects was also identified.

The Western Gateway sub-precinct is an area of approximately 1.65 hectares that is strategically located on the western edge of Central Station with Haymarket on the southern fringe of the Sydney CBD. It comprises a mix of heritage and more recent buildings that are currently occupied by a mix of tourist accommodation, retail and office uses.

The sub-precinct's proximity to Central Station and the CBD, its location at the entry to the Devonshire Street Tunnel and frontage to the Western Forecourt of Central Station and Railway Square means that it is ideally placed to be the first phase in the future renewal of the broader Central Precinct.

### 1.1.1 Recent State Infrastructure Projects

Over the last decade, there has been significant Government investment to cater for better and more connected transport infrastructure across NSW to support Sydney's population growth and improve accessibility and amenity for its residents and visitors. Many of these projects will greatly improve the accessibility, functionality and useability of the Central Precinct.

Some of these projects (Sydney CBD and south east light rail and Sydney Metro), in particular, are anticipated to reduce demand for road dependent transport modes (such as buses and private vehicles), alleviating traffic congestion on city roads and indirectly improving pedestrian amenity and safety within Central Sydney.

These transformational, city shaping State infrastructure projects include:

- **Sydney CBD and South East Light Rail** - The recently completed Sydney CBD and South East Light Rail between Randwick and Circular Quay and Kingsford.

- **Sydney Metro** - New underground platforms will be provided for Sydney Metro under Platform 13, 15 and 16 at Central Station. Sydney's new metro railway will have a target capacity of about 40,000 customers per hour, similar to other metro systems worldwide.
- **Central Walk** - On 21 December 2017, the Minister for Planning approved a modification to the CSSI Approval (Mod 2 Approval) in relation to Central Walk at Central Station. Central Walk is a new underground pedestrian concourse that will better connect passengers to trains, light rail and Sydney Metro underground platforms. It will include:
  - A new 19-metre wide tunnel from Chalmers Street linking to new Sydney Metro platforms under Central Station
  - New, easy access points to Sydney Trains platforms 16 to 23
  - Escalators linking directly to suburban platforms for the first time.

### 1.1.2 Central Precinct State Significant Precinct Study

State Significant Precincts are areas that the Minister for Planning and Public Spaces (the Minister) has determined to be matters of State or regional planning significance. State or regional planning significance relates to social, economic or environmental characteristics that enable a precinct to play a particularly important role in achieving government policy objectives, including increasing the supply of housing and improving housing choice and affordability.

SSPs are declared and planned in accordance with the *State Significant Precinct Guideline 2016 prepared by the then Department of Planning and Environment*. Potential SSPs are assessed against the following criteria to determine their State or regional planning significance:

- be a large area of land within a single ownership or control, typically government owned
- be of state or regional importance in achieving government policy objectives, particularly those relating to increasing delivery of housing and jobs
- be of state or regional importance for environmental or natural resource conservation
- be of state or regional importance for heritage or historical significance.

In July 2019, the Central Precinct was declared a Nominated State Significant Precinct (SSP) by the Minister for Planning and Public Spaces (the Minister) because of its social, economic and environmental importance to the State. This nomination particularly recognised the Precinct's potential to boost investment and deliver new jobs as well as recognise and celebrate the Precinct's heritage significance.

The planning process is currently in Stage 1, with the draft Strategic Vision document being publicly exhibited between 17 October 2019 and 27 November 2019. The Strategic Vision has evolved into a Strategic Framework, incorporating the community and stakeholder feedback received during public exhibition. The Draft Strategic Framework sets out an overarching vision, identifies key themes and priorities, nominates parts of the precinct as sub-precincts, and provides direction on how the vision for the Precinct will be realised over the coming decades (refer the Preliminary Precinct Plan at **Figure 1**). Notably, the Draft Strategic Framework identifies the Western Gateway sub-precinct as a '*gateway to the Sydney CBD, a symbol of Central Precinct and the focal point of the innovation and technology hub*'.



The Central Precinct SSP investigation area has been divided into sub-precincts to facilitate the future renewal in a manner that positively responds to the varying character of the surrounding area, with the Western Gateway sub-precinct identified by the Minister as being appropriate for early assessment and consideration in advance of the broader Central Precinct Renewal Program. Whilst the detailed planning for the Western Gateway sub-precinct will progress separately and in advance to the remainder of Central Precinct, the Draft Strategic Vision will ensure that planning for this sub-precinct remains aligned and integrated with the overall vision of the renewal.



Figure 1. Central Precinct Preliminary Precinct Plan (as revised)



### 1.1.3 The exhibited Western Gateway Rezoning Proposal

The Western Gateway sub-precinct (as shown in **Figure 2**) includes the commercial buildings and public plaza located on the western edge of Central Precinct. Whilst land within this sub-precinct is Government-owned, it is within existing long term leaseholds and is subject to private sector redevelopment proposals (land ownership indicatively shown at **Figure 3**).

The Western Gateway Rezoning Proposal has been designed to align with the desired future character statement for the Western Gateway sub-precinct, as well as the themes and priorities developed for Central Precinct in the Draft Strategic Framework. The proposal will allow for the future delivery of innovative and distinctive buildings that will transform the southern edge of Central Sydney and introduce much needed additional commercial floorspace within this part of the city. Importantly, it aims to support delivery of the first stage of a globally competitive innovation and technology precinct, and will facilitate some of the key moves identified within the Central Precinct 'Preliminary Precinct Plan' by delivering the first stage of the north - south pedestrian link and making other key public domain improvements.

The Western Gateway Rezoning Proposal was publicly exhibited alongside the draft Central Precinct Strategic Vision document between 16 October 2019 and 27 November 2019. It seeks to amend the planning controls of the Sydney Local Environmental Plan 2012 that apply to the Western Gateway area to enable redevelopment for a technology and innovation precinct. The Western Gateway Rezoning Proposal report (on exhibition along with the EIE) was prepared by Transport for NSW to support the proposed amendments to the planning controls to:

- Amend the Sydney LEP 2012 by introducing a site-specific provision for the sub-precinct that:
  - seeks to incentivise development for non-residential uses through the provision of greater building height and gross floor area controls.
  - requires a competitive Design Excellence process that has been approved by the NSW Government Architect, in addition to Council's existing policy; include reference to Design Guidelines to inform future development of the sub-precinct and enable the arrangements for the provision of State infrastructure.
- Amend the Sydney LEP 2012 maps to:
  - apply the B8 Metropolitan Centre zone to the entire Western Gateway sub-precinct;
  - remove the Western Gateway sub-precinct area from the Special Character Areas Map; and
  - identify the Western Gateway sub-precinct on the Locality and Site Identification Map Foreshore Building Line Map – including the labelling of Blocks A, B & C within the sub-precinct.

The rezoning proposal is supported by a Draft Design Guide which provides site-specific design requirements / design guidelines for the Western Gateway sub-precinct. The Design Guide will be given statutory weight through a new site-specific provision that is proposed to be included in Division 5 of the SLEP 2012, and together with the LEP provision will provide a framework to guide and assess future development applications.

The Department of Planning, Industry and Environment (DPIE) will consider the proposed amendments to the current planning controls for the Western Gateway sub-precinct alongside the Draft Strategic Framework to ensure that the proposed changes to planning

controls are consistent with the overarching vision, themes and principles outlined for the broader Central Precinct and the Western Gateway sub-precinct.



Figure 2. Central Precinct and Western Gateway sub-precinct (shown in orange)



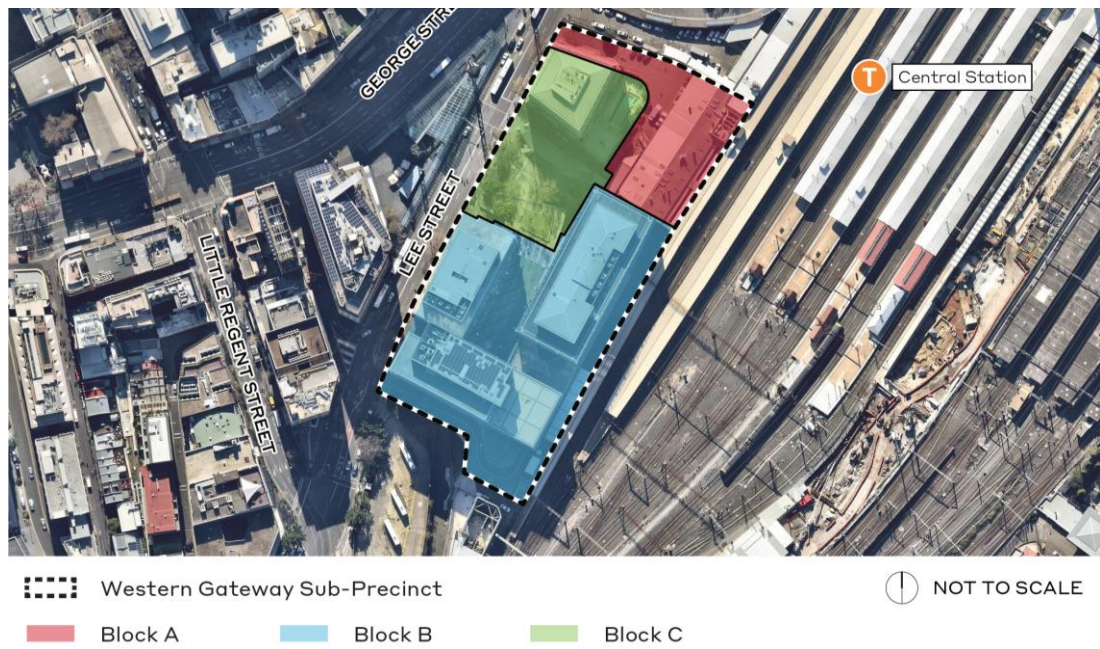


Figure 3. Western Gateway sub-precinct with delineated block ownership

## 2 Consultation

---

### 2.1 Community Engagement

Community engagement has been an important factor in shaping the work that has contributed to the preparation of the Draft Central Precinct Strategic Vision and the Western Gateway Rezoning Proposal. The consultation work undertaken by Transport for NSW to date has included:

- Between September 2016 and November 2016, Transport for NSW surveyed the community, customers and visitors and hosted an online discussion forum with close to 200 people participating in a conversation about the future development of Central Station. We heard that:
  - people thought the highlight of the Central Precinct was its heritage and the architecture of Central Station
  - Central Station was sometimes a disappointing experience and that it needed to be easier to navigate, cleaner, have better lighting and security with more variety of food, shops, cafes and bars
  - there was support for the revitalisation of Central Station with a desire to see more commercial and retail places; improved facilities and more public open spaces that respect the heritage of the area and buildings.
- In 2018 transport customers were asked what they would like to see at Central Station and in the surrounding area. We heard that:
  - people want a vibrant city hub with easy access to transport services
  - the Precinct should be a destination in itself, not just a transport interchange with cultural and leisure opportunities
  - Ongoing engagement with key Government agencies and stakeholders, including the Government Architect NSW, DPIE, Department of Premier and Cabinet, Greater Sydney Commission and City of Sydney Council.

Community and stakeholder engagement will continue to underpin the planning for the Central Precinct, including the Western Gateway sub-precinct to take into consideration the views, ideas and issues raised by stakeholders and the community.

### 2.2 Government Agency and Stakeholder Engagement

In 2017 Transport for NSW initiated early stakeholder engagement with a range of Government department and agencies, the City of Sydney and peak bodies, representative groups and advocacy groups focussed on creating the initial vision and values for the renewal of Central Precinct.

The Western Gateway sub-precinct proposal has also been informed by consultation with numerous Government agencies including the Department of Premier and Cabinet, DPIE, Office of Environment and Heritage, NSW Office of Government Architect and the City of Sydney Council.

The Western Gateway sub-precinct proposal has been a design led process, with the State Design Review Panel (SDRP) commissioned to review and provide expert advice on each of the indicative site-specific proposals.

Each of the indicative proposals for Blocks A and B, as set out by the SEPP Amendment Report, has been subject to an iterative design review and feedback process with the SDRP. The indicative schemes and proposal for the Western Gateway sub-precinct have

been refined in response to guidance received from the SDRP to ensure that the proposal is capable of delivering a high-quality built form and public domain outcomes. Any future proposals for development within the sub-precinct will also be subject to a separate competitive design process under the proposed planning framework which will need to be undertaken prior to the submission of any Development Application (DA) for the respective development proposals. Any future application will also be subject to further community and stakeholder consultation.

### **Heritage Council NSW**

In response to the Project Review Panel's recommendation to consult with Heritage Council of NSW prior to lodgement of this RtS, meetings were held with the Council on 1 April 2020 and the 6 May 2020. At the meeting on the 1<sup>st</sup> April 2020 Transport for NSW presented the proposal for the broader Central Precinct, following this on 6 May 2020 Transport for NSW and the project teams for Blocks A and B presented the proposed changes to the Western Gateway Rezoning Proposal. During these meetings the Heritage Council provided feedback with regard to the Central Precinct, highlighting the importance of heritage in the Central Precinct and also indicating support for the renewal project and recognition of the need for renewal.

In response to the meeting of 1 April 2020, the Heritage Council of NSW indicated broad support for the proposed renewal project and acknowledged the need for renewal to occur in the area. They highlighted the importance of considering the state heritage management principles during the project and encouraged engagement with the relevant Aboriginal cultural heritage advisers when further developing plans for the broader Central Precinct. It is noted that this will occur as part of the Stage 2 State Significant Precinct planning process.

Subsequent to this, a further meeting was held with the NSW Heritage Council on 6 May 2020 on the Western Gateway sub-precinct. During this meeting the proponents for Block A and Block B provided an update to the NSW Heritage Council on their respective projects with regards their vision, the proposed massing, and the anticipated program for further detailed planning. Discussions on the Western Gateway sub-precinct centred around management principles to represent the heritage context as a key asset, measures to ensure appropriate commitment to heritage as a driver for the project, and the requirement for more detailed consideration of some heritage matters that will accompany future Development Applications in the sub-precinct.

In response to the meeting held on 6 May 2020, a working party and forward program for ongoing engagement with the Heritage Council of NSW has been established and will continue to take place with the proponents, until determinations can be made for future development applications for Block A and Block B. This will ensure all heritage matters, particularly in relation to protection of heritage fabric, interpretation, design quality and sensitive adaptive re-use, can be discussed and addressed appropriately. The next step in this process is an agreement between the proponents and the Heritage Council to have further design briefing meetings in the June and July, as well as subsequent ongoing consultation.

Overall the NSW Heritage Council noted the excellent engagement of both the proponents and welcomed the opportunity for ongoing dialogue and engagement to assist with further design development.

## **2.3 Public Exhibition of the Western Gateway Rezoning Proposal**

DPIE publicly exhibited the Western Gateway Rezoning Proposal for a period of six weeks between 16 October and 27 November 2019. The exhibition was promoted on

DPIE's website and advertisements were placed in the Sydney Morning Herald on 23 October, 30 October and 13 November 2019. During the exhibition period, the following community and stakeholder engagement activities were undertaken:

- meetings were held with key stakeholders including City of Sydney, Camperdown-Ultimo Alliance comprising of University of Sydney, University of Technology Sydney, Notre Dame University, TAFE NSW, Sydney Local Area Health District and Health Infrastructure. Other agencies include Urban Taskforce Australia, The Committee for Sydney, Sydney Business Chambers of Commerce, Tourism and Transport Forum and NSW Property Council.
- 20,500 flyers were distributed to residents and businesses within a 500 metres radius of Central Precinct
- more than 15,000 flyers were distributed to customers at the Central Station during evening peak periods
- over 130,000 views on Central Precinct social media video, with 90 per cent of viewers continuing to watch after 20 seconds
- letters were sent to businesses leasing within the State Significant Precinct boundary with project information and how to have your say
- 93 emails were sent to Central Precinct mailing list subscribers
- over 20 direct emails and phone calls were made targeting local community groups and key neighbours with project and exhibition information
- a Central Precinct Renewal webpage was created with project information and how to have your say via a direct link to DPIE Planning Portal. Exhibition details were also available on Department of Premier & Cabinet Have Your Say website
- four drop-in information sessions were held during the exhibition period at Central Station for community members to meet and speak with the project team.
- static displays were set up at Town Hall, Surry Hills Library and Ultimo Library allowed community members to view copies of Central Precinct Strategic Vision, Western Gateway Rezoning Proposal and project information
- advertisements were placed in the Sydney Morning Herald on 23 October, 30 October and 13 November
- 16 enquiries responded to via Transport for NSW's project infoline and email address.



### 3 Overview of submissions

During the public exhibition period there were 28 submissions received in response to the Western Gateway Rezoning Proposal. The type of respondents commenting on the exhibited Western Gateway Rezoning Proposal, include:

- 16 submissions from the community
- 3 submissions from government agencies
- 1 submission from the City of Sydney Council
- 8 from non-government organisations.

Overall, the submissions received were largely supportive of the exhibited Western Gateway Rezoning Proposal, as shown in the breakdown of submissions in **Figure 4** below.

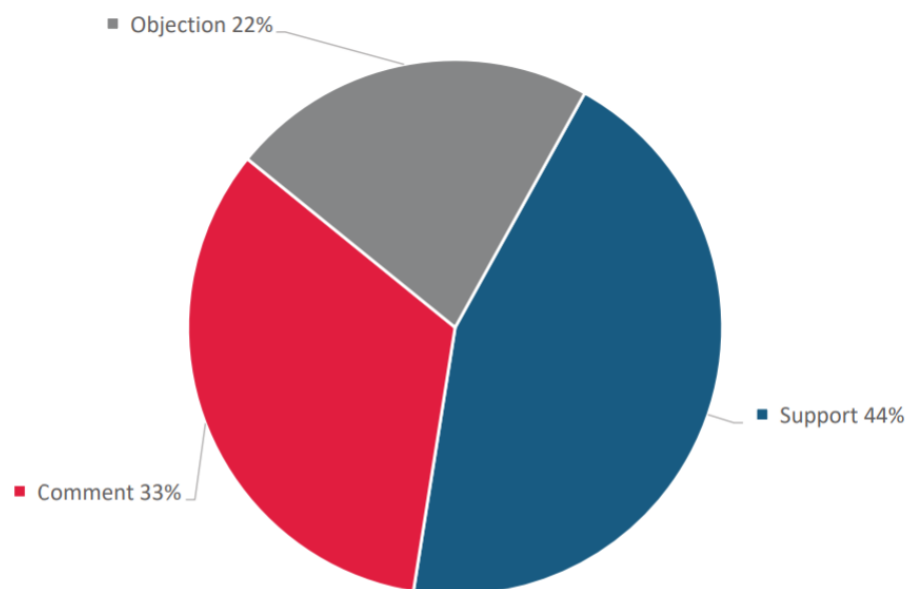


Figure 4. Breakdown of submissions received during exhibition period

Source: Central State Significant Precinct Submissions Summary (DPIE, 2020)

Transport for NSW has tabulated the submissions (refer to **Section 7** of this Response to Submissions Report). The format includes details of each submission, a summary of the key points raised in each submission and responses together with details of further changes (if any) to the exhibited Western Gateway Rezoning Proposal.

Details of the response to key issues raised as part of submissions received from the community, government agencies, non-government organisations are discussed in **Section 4** of this Response to Submissions Report.

#### 3.1 Key Community Feedback

A number of issues were raised frequently or in a large proportion of the submissions received from the community. Key community feedback received related to:

- **Public space** - The provision of public space in the Western Gateway sub-precinct (33% of submissions received) and the introduction of additional or upgraded western access to Central station was viewed as a significant benefit of the proposal (11% of submissions received);

- **Land use** - The proposed land uses considered for the precinct including the technology ecosystem commercial floorspace and proposed retail and entertainment/nightlife active uses are generally supported (19% of submissions received);
- **Built form** - Concern that the density and height proposed would create negative impacts (14% of submissions received);
- **Responding to heritage** - Concern the proposed development may not appropriately respond to heritage significance of Central Station and surrounds (5% of submissions received), in particular submissions noted the concern that proposed development may detract from the prominence and character of the sandstone clock tower and the rail yards;
- **Sustainability** - High sustainability targets should be included to address the increased energy and emissions the proposed density will introduce (14% of submissions received); and
- **Overshadowing** - Ensuring that the proposed planning framework and development of the Western Gateway does not overshadow Prince Alfred Park (7% of submissions received).

## 3.2 City of Sydney Council

### 3.2.1 Issues raised in submission

Overall, the City of Sydney expressed support for the focus on public transport and walking, the provision of detailed design guidance through the draft 'Western Gateway Design Guide' and the requirement for a competitive design process in the Western Gateway rezoning proposal.

#### Infrastructure

State and local infrastructure required to support the proposal and the provision of a definitive contributions framework to ensure the commitment for the timely delivery of infrastructure should be considered and determined prior to finalising the planning controls.

#### Strategic Land Uses

The planning controls need to ensure that the future development applications for Block A and B provide a strong emphasis on innovation and technology-based uses in order to ensure the vision is met.

#### Movement Access and Public Space

The Design Guide should:

- delineate useable public space from vestigial publicly accessible spaces as part of movement corridors;
- ensure that an overarching transport strategy for the entire sub-precinct is provided to ensure consistent approach to managing traffic impacts, servicing, car parking, staging and managing pedestrian and vehicular access for the precinct; and
- ensure cyclist and pedestrian access and safety is prioritised by ensuring future movement corridors are at-grade.

#### Sustainability

The Design Guide should:

- ensure new development in the sub-precinct is to include an ESD Strategy that demonstrates how the following targets will be met:
  - 6-star NABERS Energy Rating for commercial uses with a commitment agreement
  - 4.5-star NABERS Energy Rating for hotel uses with a commitment agreement
  - 4.5-star NABERS Water Rating for commercial uses
  - 4-star NABERS Water Rating for hotel uses
  - Platinum core and shell WELL Rating (version 2) for commercial uses
  - 6-star Green Star Design and As-Built rating (version 1.2)
- ensure that new development achieves net zero emissions by being highly efficient and using a minimum of 100% renewable electricity and employing other strategies such as maximising on-site generation, purchasing renewable electricity generated off-site and purchasing gold class offsets for remaining energy; and
- ensure new development in the precinct includes an Integrated Water management Strategy.

### **Design Quality**

The Draft Design Guide should:

- ensure protection of sun access on existing and future public spaces;
- apply 75-80% envelope efficiencies to ensure flexibility for articulation and design;
- provide appropriate building separation to address interface issues, maintain view corridors and address wind issues, including:
  - providing a minimum 30m separation between Block A and B;
  - ensuring open to sky between Block A and C; and
  - ensuring a minimum 3 metre setback above the podium along Lee Street.
- ensure building envelope design does not generate public domain wind effects (temporary structures are not considered sufficient to adequately mitigate wind impacts);
- provide a wind map identifying critical points in the public domain;
- maximise active building frontage to 80%; and
- specify that architectural design competitions involve no less than five competitors.

## **3.3 Government Agencies**

### **3.3.1 Heritage NSW**

#### **Issues raised in submission**

Heritage NSW notes the sensitive heritage environment, in particular the design, siting, visual connection and dominance of the Main Terminus/Clocktower and the former Parcels Post Office buildings in the precinct. Heritage NSW recommends that detailed consideration of the form of any approved buildings in the precinct respect the heritage values and legibility of these existing items.

Heritage NSW also raised concern with regard to the proposed forms of the Western Gateway rezoning proposal and its response to the predominate heritage items in the

precinct or the streetscape and recommend reducing the maximum building heights to reduce adverse visual impacts to heritage items.

Heritage NSW recommended that any new development contribute to a uniform connected public realm which includes high end heritage interpretation to inform the public of the unique heritage values of the area from the Aboriginal custodianship to nineteenth century urbanism and industrial revolution.

### **3.3.2 Environment, Energy and Sciences Group (Formerly Office of Environment and Heritage)**

#### **Issues raised in submission**

Environment, Energy and Sciences Group noted it is unlikely that the Grey-headed Flying-fox will be impacted by the rezoning.

It was recommended that a microbat survey is undertaken as the sub precinct may provide habitat for threatened and protected microbats.

### **3.3.3 Sydney Local Health District**

#### **Issues raised in submission**

The submission recommends a stronger emphasis on culture and identity of Aboriginal communities should be introduced into the Draft Strategic Vision and any future planning.

## **3.4 Non-government agencies**

### **3.4.1 University of Technology Sydney**

The submission from the University of Technology Sydney (UTS) supports the need for a more holistic approach to unlocking the full potential of the Innovation Corridor. It highlights that fast tracking the delivery of the Central Precinct should not be at the expense of other equally important areas of the Innovation Corridor, such as UTS, Powerhouse Museum, Sydney University and Royal Prince Alfred Hospital.

UTS raise the need for improvements of the Lee Street tunnel and redevelopment of the underground tunnel from the Western Gateway sub-precinct through to Mortuary Station. Further, the submission suggests the Goods Line must be delivered as part of the first stage of works for the overall renewal of Central Station.

UTS have requested involvement in the design phase of the new bus interchange at Railway Square.

### **3.4.2 The National Trust**

#### **Issues raised in submission**

The National Trust Submission considers that there is a disconnect between the stated aims of 'context responsive' design 'reinforcing the iconic architecture' as presented in the draft Strategic Vision and the 'city-scale' commercial proposals for Block A and B of the Western Gateway.

The height and bulk of the proposals is considered to have an impact on the heritage significance of the Parcels Post Office, Central Station Clocktower and Marcus Clarke

Tower. The Rail Yards sub precinct is considered more appropriate for this level of density.

The National Trust submission further states that the clearance between the Block A proposal and the Inwards Parcel Shed is not a good example of celebrating the heritage significance of that item.

### **3.4.3 Property Council NSW**

#### **Issues raised in submission**

The Property Council of Australia note in their submission that the Western Gateway sub-precinct provides the opportunity to better integrate a multifunctional space that can be used for repose, movement, gathering and meeting with key retail, commercial office and mixed use development. The Property Council fully supports the establishment of the Western Gateway as a visual marker for Central Precinct through the creation of city scale building that positively contributes to Sydney's skyline, character and public identity.

### **3.4.4 YHA Australia**

#### **Issues raised in submission**

YHA raised general support, however noted the following issues as important considerations:

- Reconnection of the Central Precinct to surrounding suburbs is important to deliver a connected city for visitors and tourists
- The youth demographic of YHA hostels will benefit from a high quality and 24 hour activated precinct. YHA consider this to ensure the success of the Precinct
- The Central precinct is a unique opportunity to deliver short term tourist accommodation in a high quality and well connected precinct in line with the City of Sydney Council's Sydney 2030 Tourism Activation Plan.

## **3.5 Project Review Panel**

A Central Precinct Project Review Panel was established at the beginning of the project, comprising the NSW DPIE, the City of Sydney Council, the Government Architects Office and the Greater Sydney Commission. The Project Review Panel has provided ongoing guidance and advice during the preparation of the exhibited Central Precinct Strategic Framework and Western Gateway Rezoning Proposal.

A responsibility of the Project Review Panel is to review and consider the submissions received from the community, non-government organisations, City of Sydney and NSW Government agencies for the exhibited Central Precinct Strategic Vision and Western Gateway Rezoning Proposal. This is to confirm the summary of submissions and to advise on issues raised through submissions.

The advice from the Project Review Panel is that the Western Gateway Rezoning Proposal will need to address the recommendations of the Project Review Panel within the following themes:

## Wind impacts

- The panel recognised that areas most impacted by poor wind conditions created by the proposals were the future public spaces of Railway Square, Henry Deane Plaza, Lee Street, the future third square north of the Western Gateway sub-precinct and the key public connection to the OSD deck.
- The panel commented that no evidence or analysis has been presented to date which would demonstrate that the future OSD could ameliorate negative wind impacts generated by the proposed built forms.
- The panel reiterated its previous advice and the advice of the Design Review panel on the issue of wind and additionally recommended that wind impacts generated by the proposals need to be addressed at the rezoning stage through changes to the proposed building envelope massing and not through temporary or secondary/ancillary wind mitigation measures at the development application stage which are considered unacceptable.
- It is recommended that Transport for NSW in its RtS demonstrate that the proposed built forms for Block A and B in the Western Gateway ensure an acceptable wind environment. In particular, sitting in public domain areas, walking throughout the sub-precinct and standing at building entrances should be prioritised.

## Block A and Block B Building Separation

- The panel noted the exhibited Draft Western Gateway Design Guide proposes building envelope controls allowing a building/tower separation ranging from 24m – 30m between Block A and Block B, allowing the reduced 24m separation if criteria including achieving design excellence and mitigating wind impacts can be demonstrated.
- In response to public submissions, the previous advice of the DRP and Project Review Panel and the panel's advice regarding the wind impacts, the panel recommended that the proposals adopt a minimum 30m clear separation between the planning envelopes of Block A and B and specified that the additional separation required to achieve 30m should be accommodated within Block B.
- The panel considers that there is sufficient scope for the building envelopes to accommodate a 30-metre separation distance and that this can be best achieved through reallocation of the built form on Block B, without any loss to potential GFA.

## Sustainability

- The Project Review Panel noted community submissions raising the need for a more resilient and sustainable city and for new development to increase environmentally sustainable design (ESD) targets to a higher level to match those of other countries. The Project Review Panel additionally recognised the public sentiment expressed in submissions to improve the commitment to reducing waste and single use plastic in the precinct.
- In response to the issues raised by the community and City of Sydney submissions, the panel reiterated its previous advice that the ESD performance targets should achieve a high benchmark, and confirmed that Transport for NSW in its response to submissions should improve the focus and commitment to sustainability in the Western Gateway and the Central SSP as a precinct wide approach with individual projects connecting into the precinct strategy.

## Infrastructure contributions

- The panel noted the City of Sydney's submission raising the need for the Central Precinct and Western Gateway rezoning to consider State and local infrastructure



needs and for a framework for the contributions and delivery of infrastructure to be developed.

- The panel recommended Transport for NSW in its RtS provide an infrastructure needs assessment, a framework for contributions and a schedule for the potential delivery of State and local infrastructure.

### **Western Gateway developments**

- The panel noted the City of Sydney's submission raising the need to ensure the site-specific developments for the Western Gateway and across the broader precinct deliver the strategic land uses of innovation and technology-based businesses, to achieve the shared vision for the precinct.
- The panel recommended that Transport for NSW in its RtS introduce strategic statements in the proposed planning framework for the Western Gateway to ensure technology and innovation uses are achieved in the future developments.

### **Western Gateway Draft Design Guide – Block B Lee Street Setback**

- The panel noted the City of Sydney's submission requesting the Western Gateway Design Guide be amended to ensure a minimum setback above the podium along Lee Street to ensure design quality and improve the relationship of the tower to surrounding buildings and the public domain.
- The panel noted that the exhibited Western Gateway Draft Design Guide considers a potential zero-metre setback above the podium street wall height along the Lee Street frontage adjacent to Railway Square.
- In consideration of the City of Sydney's submission, the previous Project Review Panel advice on the issue and the advice on minimising negative wind impacts through the building envelope design, the panel reiterated the recommendation to provide a minimum 6 metre setback above the podium along the Lee Street frontage and should amend the Western Gateway Design Guide accordingly.

### **Heritage**

- The panel additionally recommended that Transport for NSW commence consultation with the Heritage Council or their Approvals Committee, prior to any Western Gateway SEPP finalisation, and prior to any further consideration of the proposal for the redevelopment of Block C. Transport for NSW's response should demonstrate that appropriate consultation has taken place.
- The panel also noted that the process to date has not articulated how it will address the conservation management documents relevant to the Western Gateway. These should be addressed in collaboration with Heritage NSW as part of Transport for NSW's response.
- In light of the Heritage NSW submission and the panel recommendations on the other matters raised in submissions (wind, building separation, urban tree canopy) the panel additionally noted the need for a coordinated public domain strategy for the Western Gateway and more broadly for the Central SSP. The panel recommended that Transport for NSW's response should include a coordinated public domain strategy that considers integration of heritage values for the Western Gateway, which is appropriately addressed in the Strategic Vision/Framework.

### **Urban Tree Canopy**

- The panel noted the Environment, Energy and Science Group's submission provided for the Western Gateway Rezoning Proposal that recommended to undertake a survey for threatened and protected species including microbats.

- The panel considered this issue as relevant to the provision of urban tree canopy in the precinct to enhance amenity and biodiversity and further noted this as an opportunity to address the Premier's priorities for 'Greener Public Spaces' and 'Greening our City' which target the increase of tree canopy in Greater Sydney.
- The panel recommended Transport for NSW emphasise in the Central Precinct Strategic Framework a commitment to the Premier's priority to increase tree canopy and to outline how the precinct can contribute to the target of planting 1 million trees in Greater Sydney by 2022.

### **Objectives and planning priorities in the Greater Sydney Region Plan and Eastern City District Plan**

Further to the panel's previous advice, it noted the exhibited materials do not appropriately address the objectives and planning priorities in the Greater Sydney Region Plan and Eastern City District Plan. In particular:

- Consideration of a range of initiatives to address affordable rental housing (Objective 11);
- Consultation with Local Aboriginal Lands Councils (Planning Priority E4);
- Investigation of opportunities for precinct-based provision of adaptable car parking and infrastructure (Objective 12, Planning Priority E6);
- Identification and conservation of heritage (Planning Priority E6);
- Strengthening international competitiveness of the Harbour CBD and growing its vibrancy (Planning Priority E7);
- Delivering integrated land use and transport planning and a 30-minute city (E10); and
- Supporting growth of targeted industry sectors, in particular tourism and visitation and night time economy (Planning Priority E13).

With consideration of the recommendations of the Project Review Panel, amendments have been made to Western Gateway Rezoning Proposal, as detailed in **Section 5** of this Response to Submissions Report.

## 4 Response to key issues raised

### 4.1 Land Use

#### 4.1.1 Enhance emphasis on technology and innovation

##### Parties which raised this issue:

The City of Sydney

University of Technology Sydney (UTS)

Members of the public

##### Issues raised in submissions

The City of Sydney noted that the draft SEPP should encourage a strong emphasis on innovation and technology-based businesses and other strategic land uses in future site-specific development proposals in the Western Gateway sub-precinct.

In particular, future site-specific development proposals for the Western Gateway sub-precinct should address the future and desired role of the sub-precinct in the tech start-up sector and ecosystem and how the development in Blocks A and B would be suitable for knowledge-based businesses and tech start-ups.

- the role of the sub-precinct in the Camperdown-Ultimo Health and Education Precinct, consistent with the actions and recommendations of the Greater Sydney Commission's Camperdown-Ultimo Place Strategy,
- the future and desired role of the sub-precinct in the tech start-up sector and ecosystem and how the development in Blocks A and B would be suitable for knowledge-based businesses and tech start-ups,
- the retail needs and provision of other urban services, cultural and enterprise uses to attract and retain skilled workers and also cater to the needs of future and current transit users, visitors and surrounding local community.

UTS additionally recommended that the proposed technology and innovation strategic land uses should be ensured by restricting residential land uses.

##### Project Review Panel recommendations

The Project Review Panel recommended that TfNSW in its RtS introduce strategic statements in the proposed planning framework for the Western Gateway to ensure technology and innovation uses are achieved in the future developments.

##### Discussion and response

The NSW Government is committed to supporting the success of innovation and technology-based businesses and other strategic land uses in the Western Gateway sub-precinct and the broader Central Precinct. Likewise, the proponents for both Block A and Block B are committed to supporting the delivery of a technology and innovation employment precinct including start-ups, educational uses, technology-based businesses and supporting uses, as noted within their response to submissions letters included at **Appendix D** (Block A) and **Appendix E** (Block B).

The proposed B8 Metropolitan Centre zoning permits a wide range of employment, innovation and technology business uses, while also permitting a diversity of compatible land uses characteristic of Sydney's global status that serve the workforce, visitors and

wider community. The B8 Metropolitan Centre zone is the broadest land use zone under the Sydney LEP 2012 and is considered the most appropriate to deliver innovation and technology-based businesses and other strategic land uses in the Western Gateway sub-precinct.

Furthermore, the desired future character outlined in the exhibited draft Western Gateway Design Guide outlines:

*“It will catalyse emerging innovation, employment and business by providing places for workers in innovative industries, and their associated support industries.”*

In response to the issue raised and the Project Review Panel’s recommendation, the draft Western Gateway Design Guide has been refined to further emphasise the Western Gateway sub-precinct’s function as a catalyst for a technology and innovation hub.

### Outcome

The desired future character for the Western Gateway sub-precinct under Section 2.1 of the Western Gateway Design Guide (refer to **Appendix A**) has been amended to further emphasise innovation and technology-based businesses and strategic land uses. This specifically includes:

*(c) Provide a density and critical mass of employment floorspace that will anchor the future innovation and technology precinct and contribute to realising the Camperdown-Ultimo Place Strategy*

*(d) Be a smart precinct supported by technology and innovation with spaces and an environment that supports knowledge-based businesses and tech start-ups, and which has strong links to the Camperdown Ultimo Collaboration Area and its users*

*(e) Incorporate other town centre uses such as retail and service-based businesses that are important to ensuring a well-functioning town centre environment that services the needs of its users*

## 4.2 Heritage

### 4.2.1 Responding to existing heritage

#### Parties which raised this issue:

Heritage Council of NSW

The National Trust

Members of the public

#### Issues raised in submissions

The National Trust Submission suggests that there is a disconnect, in terms of proposed height, bulk and density, between the stated aims of ‘context responsive’ design ‘reinforcing the iconic architecture’ as presented in the draft Strategic Vision and the ‘city-scale’ commercial proposals for Block A and B of the Western Gateway.

The National Trust and Heritage Council submissions note the sensitive heritage environment within and surrounding the Western Gateway sub-precinct, in particular the design, siting, visual connection and dominance of the Parcels Post Office, Central Station Clocktower and Marcus Clarke Tower. It notes that detailed consideration should be given to the form of any approved buildings in the precinct to ensure they respect the heritage values and legibility of these existing items.

## Discussion and response

Like other parts of Central Sydney, there are a number of sensitive heritage buildings which sit adjacent to and are co-located next to areas of taller building forms. Indeed, this is the case in most global cities which have a rich cultural heritage. In all these cases, there is an onus on providing an appropriate planning and heritage framework to carefully manage and assess these relationships, and ensure that contemporary developments respond sensitively, and indeed positively to their context. The framework proposed for the Western Gateway sub-precinct, together with other existing controls, provides a robust set of principles to minimise any potential visual impacts to the heritage values of Central Station and its surrounding heritage items.

City of Sydney's Local Strategic Planning Statement recognises the area around Central Station with Ultimo, Haymarket and parts of Surry Hills as the future southern extension of the Central Sydney CBD. It provides an overarching vision of growth and renewal in this area and in doing so, established a reasonable expectation for change to occur. This change is focussed on creating new spaces for jobs in knowledge-based industries, and is balanced with the delivery of cultural, social and essential infrastructure and new public spaces to commensurate this growth.

While change may occur, this will not undermine the importance of ensuring a future development outcome that responds to the sub-precinct's heritage significance. As part of the exhibited Western Gateway Rezoning Proposal, heritage impact statements for Block A and Block B were prepared to support the proposal for the Western Gateway sub-precinct. These heritage impact statements provided a detailed analysis of the heritage context and demonstrated the proposals for Block A and Block B were suitable, subject to the recommendations and guidelines made.

Importantly, the Western Gateway Design Guideline has been drafted to highlight the importance of heritage in the sub-precinct, and to ensure that new development compliments existing heritage buildings. This includes the requirement for appropriate building separation as well as the need for new buildings to comprise of forms and design treatments that positively respond to scale and materiality of these existing buildings.

Whilst it is acknowledged that the proposed building massing and scale will have an impact upon the smaller adjacent heritage items, measures have been identified to ensure future buildings appropriately respond to these items taking into consideration Central Sydney context within which they exist and the overarching Government aspiration to see renewal occur in this area.

### Block A

The Atlassian Block A proposal for the YHA Railway Square site is substantially distanced from the Main Terminus/Clocktower building and the detailed design of the building will have consideration for potential visual impacts. A detailed heritage views analysis and view impact assessment will be prepared to identify and analyse potential visual impacts of the Atlassian proposal. The view analysis will be prepared as part of the site specific Conservation Management Plan, and form part of the Atlassian State Significant Development Application (SSDA) package. The detailed proposal will respond to its site specific heritage context to ensure that the heritage values of the place and its individual elements are recognised and respected.

In addition, the proposed draft planning controls have been informed by a detailed set of heritage principles to specifically guide the relationship of the Inwards Parcels Shed with any new development on the Block A site. These principles have been reflected in the draft Western Gateway Design Guide and will be considered as part of the assessment for any future development application.



It is considered that the framework for assessment of future DAs in the Western Gateway sub-precinct and the draft Design Guidelines provide a robust tool for the future assessment of the built form to manage potential impacts. This includes specific clarity on the curtilage of the Inward's Parcels Shed, managing key heritage views, guidance on tower separation and other initiatives which will complement other heritage requirements for future development typical for any adaptive re-use such as a new Conservation Management Plan, Heritage Impact Statement, Interpretation Strategy and Visual Impact Assessment.

### Block B

As part of the exhibited Western Gateway Rezoning Proposal, GML Heritage prepared a Heritage Impact Statement for Block B. The Heritage Impact Statement provided a detailed analysis of the heritage context and demonstrated that the proposal for Block B was suitable, subject to implementation of the recommended Heritage Design Guidelines prepared by GML Heritage as part of the exhibited rezoning package.

In response to the submissions received from the Heritage Council and National Trust, GML Heritage has undertaken a review of the issues raised. The review confirms the matters raised by the Heritage Council and National Trust were addressed in the publicly exhibited Heritage Impact Statement and accompanying Heritage Design Guidelines for Block B. The request by the City of Sydney Council to strengthen the draft Design Guide heritage provisions is also addressed through GML Heritage's response, as follows:

- The proposed Block B building height is consistent with both the City of Sydney Council's solar access planes and the proposed view access plane for Central Clock Tower defined in the Planning Proposal for Central Sydney.
- The building separation between Block A and Block B and the proposed podium height (RL 63.8 excluding balustrades and hand rails) respectively facilitate views from the east to Marcus Clarke Tower and seek to respect the scale of the Former Parcel's Post Office (Adina Hotel).
- The Heritage Design Guidelines identified in Section 6.0 of the Block B HIS provide appropriate guidance on how to respond to the existing heritage context. The implementation of the Heritage Design Guidelines will support mitigation of potentially adverse heritage impacts through setbacks, physical separation of taller components, character and materiality, and interpretation and stories among other initiatives.
- The Heritage Design Guidelines also emphasise the importance of stories and interpretation. The development of an interpretation strategy is recommended as an important first step. However, the realisation of heritage interpretation will ultimately be a matter for future Development Applications, consistent with conventional processes. The Block B interpretation strategy would be coordinated with any Central-wide interpretation plan or strategy prepared by Transport for NSW.

Given the anticipated change in context of this part of Central Sydney, the Heritage Design Guidelines combined with the draft Western Gateway Design Guide and existing heritage provisions are considered to provide an appropriate framework to manage change and retain adequate heritage settings within this changing context.

### **Outcome**

Given the above considerations, no change is proposed. Future development applications for Block A and Block B will include further detailed view impact analysis as part of detailed heritage assessment, heritage guidelines and a Conservation Management Plan for Block A, ensuring an outcome and assessment approach that is consistent with current practices in NSW.

## 4.2.2 Integration of heritage values in the public domain strategy

### Parties which raised this issue:

Heritage Council

Project Review Panel

The Heritage Council highlighted that any new building elements should not be considered in isolation but look to enhance the setting and provide for uniform connected inspired public realm spaces (place making). These areas should be considered for high-end heritage interpretation outcomes that seek to inform the public of the unique heritage values of the broader precinct.

### Project Review Panel recommendations

The Project Review Panel noted that the Response to Submissions report should include a coordinated public domain strategy that considers integration of heritage values for the Western Gateway.

### Discussion and response

It is recognised that understanding the significance of the individual components of the place and their contributing value to the whole Central Station site is important to retain a sense of place and character across the whole State heritage item. A Public Domain Strategy has been prepared for the Western Gateway sub-precinct (refer to **Appendix B**), to ensure a coordinated and comprehensive approach to delivering the public domain and will:

- prioritise the intuitive movement of people, creating clear and comfortable connections to train, bus and light rail connections
- consider the relationship of the historic built fabric, through the creation of unique and complimentary public space
- integrate heritage elements into the public domain.

The principles of the Public Domain Strategy, relating to heritage include:

- Strong connectivity with heritage built form
- Robust and finely detailed materials to respond to heritage materiality
- Activate heritage façades
- Heritage interpreted in the public domain

This will ensure heritage values will be integrated into the future public domain.

### Outcome

A Public Domain Strategy (refer to **Appendix B**) has been prepared and will guide the future design of the public domain within the Western Gateway sub-precinct.

### 4.2.3 Aboriginal culture and heritage

#### Parties which raised this issue:

Heritage Council of NSW

Project Review Panel

#### Issues raised in submissions

Submissions noted that any new building elements should be considered holistically in its broader setting for high-end heritage interpretation outcomes that seek to inform the public of the unique heritage values of the broader precinct, from Aboriginal custodianship and traditional practices, to nineteenth and twentieth century urbanism and changes driven by the Industrial revolution.

Furthermore, submissions noted that a stronger emphasis should be placed on the culture and identity of Aboriginal communities, and Central Precinct should be a place which celebrates the connection to Aboriginal heritage, lands and cultural assets.

#### Discussion and response

This recommendation is supported and both proponents of Block A and Block B have adopted this sentiment in their design approach.

The Western Gateway Design Guide requires a Heritage Impact Statement and a Heritage Interpretation Strategy to accompany any future development application for a new building. These requirements are intended to work with existing heritage controls to ensure the significance of the Western Gateway sub-precinct and the broader Central Precinct is interpreted and understood in its redeveloped state. All heritage reports and documentation will need to be prepared by consultants with the necessary qualifications and expertise, and consultation will need to be held with key stakeholders, including relevant Indigenous groups, land councils and advisors, as well as the Heritage Council of NSW. This process will ensure Aboriginal and Indigenous Heritage is assessed and taken into account as part of any future development proposal in the Western Gateway sub-precinct.

#### Outcome

Heritage Interpretation Plans will be prepared by a consultant specialising in the curation of meaningful and successful heritage interpretation media, and will form part of the future DAs for Block A and Block B. The interpretation strategies will identify opportunities for robust interpretation approaches to be integrated into the design of the Western Gateway sub-precinct that reflect the Aboriginal cultural heritage of the place. Aboriginal and Indigenous groups, associations and representatives will also be consulted as part of any future development application process in accordance with the relevant provisions and requirements.

#### 4.2.4 Site-specific conservation management plans

##### Parties which raised this issue:

City of Sydney

Project Review Panel

##### Issues raised in submissions

The City of Sydney noted that the rezoning proposal must ensure new structures and development adequately responds to the heritage characteristics of the Precinct and surrounding areas. In particular, future development proposals on Blocks A and B must include a site-specific Conservation Management Plan that ensures:

- retention of three-dimensional features of the former Inwards Parcels Post Shed and former Parcels Post Office heritage buildings;
- architectural detail of new elements read as a contemporary structure; and
- proportion and detailing of new development references and address heritage buildings through bulk, articulation, form and quality of materials used.

##### Project Review Panel recommendations

The process to date has not articulated how it will address the conservation management documents relevant to the site. These should be addressed in collaboration with Heritage NSW as part of TfNSW's response.

##### Discussion and response

A site-specific Conservation Management Plan will be prepared as part of the future development application for Block A. The Conservation Management Plan will provide recommendations regarding the conservation of the former Inwards Parcels Post Shed and former Parcels Post Office heritage buildings, architectural details to ensure sympathetic development through consideration of proportion, materiality, articulation, and contemporary design quality.

This Conservation Management Plan for Block A will recommend that a robust heritage interpretation plan is prepared to ensure that the significance of the broader parcels precinct is interpreted and understood. Understanding the significance of the individual components and their contributing value to the whole Central Station site is important to retain a sense of place and character across the whole State heritage item.

Block B does not accommodate any locally or State heritage listed building/items and does not have any inherent heritage value as evidenced by the findings of the Heritage Impact Statement prepared for Block B. It is considered that the preparation of a Conservation Management Plan is not warranted for Block B given it is a highly disturbed site, does not contain any heritage items and otherwise has little heritage value.

##### Outcome

Given the above, no changes are proposed for this rezoning application. These recommendations are supported and will be addressed during the future development application stage for Block A, which is considered to be the appropriate time for a site specific Conservation Management Plan to be prepared.

## 4.2.5 Physical impacts to heritage items

### Parties which raised this issue:

The National Trust

### Issues raised in submissions

The National Trust submission notes in regard to potential physical impacts to heritage items, that detailed consideration should be given to the form of any approved building(s) in this sensitive environment so that they respect the heritage values and legibility of existing structures and seek to minimise penetrations and disruption of spaces and historic fabric.

### Discussion and response

The proposal for Block A has had regard to the principles developed for future development on the site to ensure that the significance of the Former Inward Parcels Shed is retained and conserved. These principles were outlined in Weir Phillips Heritage's Heritage Impact Statement prepared as part of the Western Gateway Rezoning Proposal, and include the following key guidelines:

- The preservation of the view to the Shed from the north, along with an understanding of the interrelation of the Shed with the Central Station buildings and the Parcels Post Office.
- Sufficient height between the roof of the former Inwards Parcels Shed and the underside of a tower in order provided to maintain a visual separation between the two.
- An understanding of the simple form of the former Inwards Parcels Shed is maintained.

The proposal for Block A seeks to substantially integrate the existing inward parcels shed as part of the new building design. It is proposed that the existing shed building will be carefully dismantled and stored during ground works for the new Atlassian tower, and then reconstructed as part of the development. The shed building will provide key arrival and gathering spaces within the new development maximising the activation and interpretation opportunities for this space.

Sufficient vertical clearance between the Former Inwards Parcel Shed and the soffit of the proposed tower has been provided so that the overall form and setting of the shed can be understood and interpreted. This vertical separation provides the shed with breathing room above the roofline so that the important roof form of the building is retained. This separation is also providing opportunities to explore activation and interpretation utilising this space, to integrate more broadly with the remainder of the Western Gateway sub-precinct.

As Block B does not contain any individually listed building/items (at either local or State level) and has no inherent heritage value, the Heritage Design Guidelines provide guidance to the future Block B development to address issues of setting and protection of adjacent and nearby heritage items.

### Outcome

Given the above considerations, no change is proposed.



## 4.2.6 Consultation with Heritage Council

### Parties which raised this issue:

Project Review Panel

### Project Review Panel recommendations

The panel recommended that TfNSW commence consultation with the Heritage Council of NSW or their Approvals Committee, prior to any Western Gateway SEPP finalisation, and prior to any further consideration of the proposal for the redevelopment of Block C.

### Discussion and response

In response to the Project Review Panel's recommendation to consult with Heritage Council NSW prior to lodgement of this RtS, meetings were held with the Council on 1 April 2020 and the 6 May 2020. At the meeting on the 1<sup>st</sup> April 2020 Transport for NSW presented the proposal for the broader Central Precinct, following this on 6 May 2020 Transport for NSW and the project teams for Blocks A and B presented the proposed changes to the Western Gateway Rezoning Proposal.

In response to the meeting of 1 April 2020, the Heritage Council of NSW indicated broad support for the proposed renewal project and acknowledged the need for renewal to occur in the area. They highlighted the importance of considering the state heritage management principles during the project and encouraged engagement with the relevant Aboriginal cultural heritage advisers when further developing plans for the broader Central Precinct. It is noted that this will occur as part of the Stage 2 State Significant Precinct planning process.

In response to the meeting held on 6 May 2020, a working party and forward program for ongoing engagement with the Heritage Council of NSW has been established and will continue to take place with the proponents, until determinations can be made for future development applications for Block A and Block B. This will ensure all heritage matters, particularly in relation to protection of heritage fabric, interpretation, design quality and sensitive adaptive re-use, can be discussed and addressed appropriately. The next step in this process is an agreement between the proponents and the Heritage Council to have further design briefing meetings in the June and July, as well as subsequent ongoing consultation.

Overall the NSW Heritage Council noted the excellent engagement of both the proponents and welcomed the opportunity for ongoing dialogue and engagement to assist with further design development.

### Outcome

A forward program for ongoing engagement with Heritage Council NSW has been established and will continue to take place with the proponents, until determinations can be made for future development applications for Block A and Block B. This will ensure all heritage matters, particularly in relation to protection of heritage fabric, interpretation, design quality and sensitive adaptive re-use, can be discussed and addressed appropriately.

## 4.3 Movement, access, and public spaces

### Parties which raised this issue:

The City of Sydney

Members of the Public

### Issues raised in submissions

The City of Sydney notes that the rezoning proposal needs to ensure that future site-specific development proposals for the sub-precinct prioritise pedestrian and cyclist access, comfort and safety and adequately address existing and future public spaces and movement corridors. The City of Sydney recommends to:

- delineate useable public space from vestigial publicly accessible spaces as part of movement corridors;
- ensuring that end of trip facilities are provided adjacent to foyer entrances.
- prepare an overarching transport strategy for the Western Gateway sub-precinct to provide a consistent approach to:
  - managing traffic impacts
  - staging and managing pedestrian and vehicular access
  - providing appropriate car parking and vehicular and loading and servicing access arrangements, including:
    - ensuring that temporary vehicular access and servicing arrangements prioritise pedestrian safety and future development of Central Walk West; and
    - ensuring that vehicular access on Lee Street north (Upper Carriage Laneway) will be closed once the consolidated basement is delivered
    - providing a car parking strategy that ensures it is limited to service vehicles and mobility parking.
- ensure cyclist and pedestrian access and safety is prioritised by ensuring future movement corridors are at-grade.

Community submissions also highlighted that the proposal should focus on pedestrian and cycling networks in the sub-precinct, in particular:

- including and prioritising active transport, including walking and cycling and minimise access for cars.
- maintaining safe, easy movement for all, including people with specific mobility requirements.
- cycling access should better connect the Central transport interchange with surrounding local areas, as well as local and regional cycling routes.

### Discussion and response

#### Delineation of useable public space from vestigial publicly accessible spaces

To delineate public spaces within the Western Gateway sub-precinct, a Public Domain Strategy has been prepared which provides a holistic overview of the public domain aspirations for the sub-precinct. The public domain strategy will align with the objectives and guidelines set out within the draft Western Gateway Design Guide and will guide the future design of the public domain within the Western Gateway sub-precinct. A copy of the Public Domain Strategy is provided at **Appendix B**.

The Public Domain Strategy has been prepared to ensure that future redevelopment of the sub-precinct is supported by a high quality, activated public domain that creates opportunities for conversation and collaboration, transit and relaxation. Along with a series of public domain design principles to guide the future design of the public domain, the Public Domain Strategy provides high level design direction on key publicly accessible spaces within the Western Gateway as described below and shown in **Figure 5**.

- **The Terrace Pavilion** - The long term vision for Block B is to provide the Devonshire Street Link within Block B, connecting Lee St and Henry Deane Plaza through to the Over Station Development (OSD) deck on to Devonshire Street in Surry Hills.

The connection from Block B will comprise lifts, escalators and a series of steps and landings from RL 16 to the OSD deck at RL 30, largely to be utilised as a pedestrian access way, accompanied with a series of green public terraced spaces that integrate with the adjacent building on Block B.

In the initial term, prior to the completion of the OSD, the stairs and landings are to be completed up to a Terrace Pavilion located at RL 21, as part of the Block B development. The Terrace Pavilion is to be designed as a publicly accessible and programmable space, allowing for enhanced amenity, usability and activation – including retail, commercial and community uses. The Pavilion's structure will enclose and protect the spaces whilst being a structure that is impressive in its design and shape. The design and use of the Pavilion can be a contributor to the heritage interpretation of the precinct, and can assist to achieve the ESD objectives for Block B, contributing to a reduction in the heat island effect, whilst supporting climate change resilience by providing shade during elevated heat events.

- **The Link** - Lower link zone provides an intuitive and safe pedestrian connection from Central Walk West to Henry Deane Place and in the initial condition, Devonshire St Tunnel. The upper link zone becomes a raised boulevard linking Block B lobbies to Block A upper ground level and through to Central Station country platforms. The lower link zone is envisaged to be an activated corridor edged by retail and spillout while the upper link zone will be an urban veranda full of moments to dwell and overlook the city. Both the upper and lower links will be connected by large public stairs that provide an urban amenity for users and visitors of the area.
- **The Market Place** - The Market Place will provide a vibrant arrival experience for tenants and visitors to Block B, integrated with curated retail and dining tenancies. Lower levels are envisaged to include a distinctive food hall providing workday amenity to occupants and extended day destinations offer for all users. The food hall will be underpinned by retail that provides, amongst other things, a convenient location for groceries. Upper levels will serve as a gathering and arrival space, with complementary retail and curated experiences. Envisaged as the 'town square' for the building, the upper levels of the market place will facilitate community connectivity and knowledge sharing.
- **Henry Deane Plaza** - Henry Deane Place will be a place to dwell in or pass through, a key element of which will be pedestrian access up to the deck along the Devonshire Street Link. Level changes will be dealt with to ensure the space is fit for purpose as a place for people, active and inhabitable.
  - Clear commuter routes through lush landscape
  - Engaging and diverse planting
  - Robust and high-quality paving referencing materiality of heritage built form

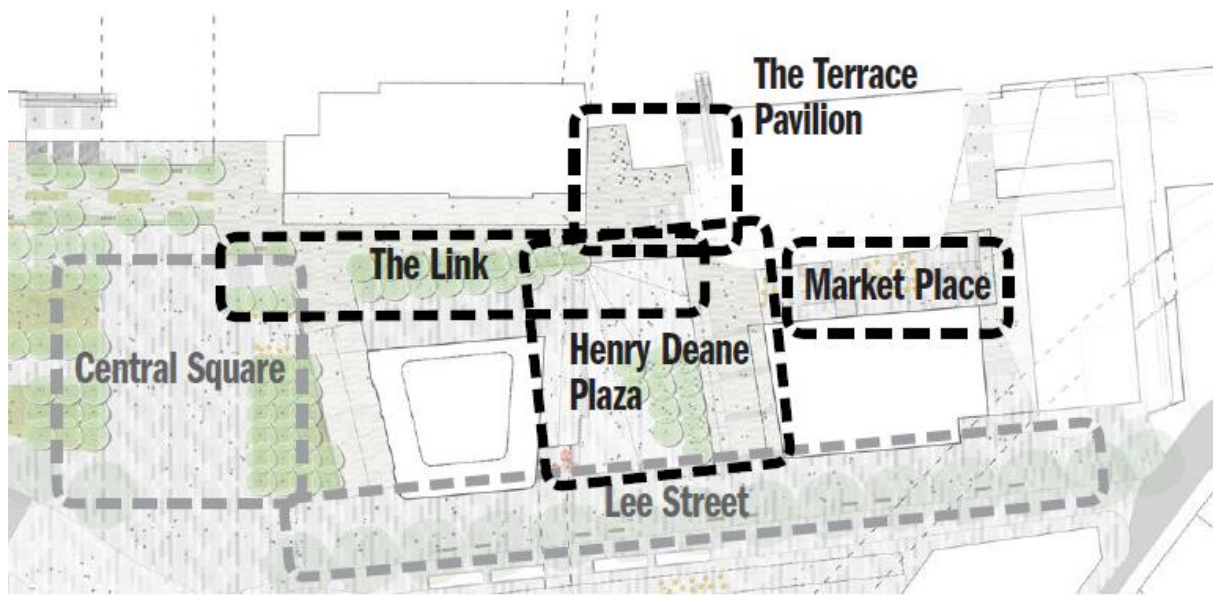


Figure 5. Key public spaces in the Western Gateway sub-precinct

Source: Hassell + Aspect Studios

As demonstrated by the Public Domain Strategy, redevelopment of the Western Gateway sub-precinct is capable of delivering a high quality public domain that will make a significant contribution to the quality of the public realm within the Central Precinct and broader Central Sydney.

#### Location of end of trip facilities

It is further noted that locating end of trip facilities directly adjacent to foyer entrances within the Western Forecourt are not considered essential, and would be more appropriately located where it best serves the functionality of the building and its users, which may or may not be adjacent to foyer entrances. Potential locations for end of trip facilities will be explored during the detailed design development phase and it is not considered necessary or appropriate to mandate such a requirement for end of trip facilities within the Design Guide. Provided the entrances to end of trip facilities are clear, accessible and legible from the public domain, this is considered to be an acceptable outcome.

#### Overarching transport strategy for the Western Gateway sub-precinct

The exhibited rezoning packages for Blocks A and B, both contained a Transport, Traffic, Pedestrian and Parking Report, which outline the approach to managing traffic impacts, servicing, car parking, staging and managing pedestrian and vehicular access. Importantly, the Transport, Traffic, Pedestrian and Parking Report for Block B considers the proposed movement arrangements for both Blocks A and B to ensure there is a consistent approach between both proposals. Transport for NSW consider that these reports appropriately outline the overall approach to traffic management for the purposes of the rezoning stage for the Western Gateway sub-precinct. Further details of traffic management, including the preparation of an overarching transport strategy for the sub-precinct, will be considered at the development application stage.

It is also noted that the future transport arrangements within the Western Gateway sub-precinct will be further detailed as part of any future detailed Development Application for Block A and Block B. In order to strengthen the consideration of the on how traffic impacts and pedestrian and vehicular access will be managed, the following amendments have been made to the draft Western Gateway Design Guide (refer to **Appendix A**):

- Insertion of a new objective to prioritise pedestrian safety during construction and operation of the sub-precinct, and ensure that the Lee Street (north) vehicular access is to be permanently closed once alternate options for basement entry and servicing are provided to Block A and Block C.
- Insertion of a new guideline requiring future DA's to be supported by a traffic management plan that sets out the measures on how traffic impacts and pedestrian and vehicular access will be managed.
- Insertion of a new guideline requiring that vehicular access on Lee Street north (Upper Carriage Laneway) will be closed once the consolidated basement access via Lee Street south is delivered on Block B

#### Cyclist and pedestrian access and safety at-grade

The Western Gateway Rezoning Proposal details significant improvements proposed to be made to pedestrian and cycling connectivity and facilities as part of the Block B proposal. These improvements align with the controls in the Draft Design Guide which are aimed at ensuring that development in the Western Gateway sub-precinct results in a high quality, integrated, permeable and accessible pedestrian and cycle network that gives priority to future pedestrian and cyclist movement.

The Block B proposal will improve transport connectivity with better pedestrian amenity, integrating with the redeveloped Henry Deane Plaza to accommodate increased movement from existing and future pedestrian connections (including Central Station's new Central Walk pedestrian link) to various modes of transport. More specifically, pedestrian connections will be improved by providing:

- A north-south pedestrian connection from RL 17.7 to RL 19.2, linking Block B to any future Central Walk extension exit via the ground plane
- A north-south pedestrian connection at RL 21
- An east-west pedestrian link between Blocks A and B to future Over Station Development
- Enhancing pedestrian access along Lee Street.

An additional guideline within the Western Gateway Design Guide has been inserted to facilitate pedestrian 'at-grade' access where possible, particularly links to surrounding areas. The subclause notes that a separate upper level public domain area designed to approximately RL21 is also considered appropriate to provide activated public domain area with weather protection.

We note that as the Western Gateway doesn't apply to land within the Western Forecourt sub-precinct, the proponents have no control in the provision of at grade foyer entrance to Central Walk. This will be further investigated as part of the Central Precinct SSP Study, which will detail movement arrangements for the Western Forecourt sub-precinct.

#### **Outcome**

A number of the amendments have been made to the Western Gateway Design Guide (refer to **Appendix A**), to address the issues raised above, specifically:

- Design Guidance 3.3.1(3), (5), (6), (9) and (12) have been updated as follows:  
 (3) A ~~secondary~~ pedestrian link should be created linking north-south through the ~~site~~ *sub-precinct*. This link will facilitate the internal circulation of workers, visitors and pedestrians in comfort from the *Western Forecourt to Henry Deane Plaza and the Devonshire Street Tunnel* to buildings in Block A and from the north to buildings in Blocks A and B. ~~This link should also support future pedestrian connections beyond~~



(5) Pedestrian access through the precinct, particularly links from surrounding areas, should be designed to be at grade where possible.

(6) An upper level public domain area designed to approximately RL21 is also to be provided.

(9) Pedestrian connections from Lee Street to the Over Station Development will be accessible, intuitive, easy to navigate with no interrupting structures to enable future flexibility *and ensure it is suitable for people of all abilities.*

(12) End of trip facilities of a sufficient scale and design, *and must be provided in a location that is clearly visible and which supports* ~~adjacent to foyer entrances, with clear,~~ direct and intuitive access to be provided for its users, including cycle parking for visitors and employees.

- Design Guidance 3.3.3(7)(b) and 3.3.3(8) have been updated as follows:

(7) The final arrangement of site access should be provided as follows:

a. Lee Street (south) site access is to be the primary vehicular access point for the Western Gateway sub-precinct,

b. Lee Street (north) access is to be provided as until both Block A and C are provided with alternate options for basement entry and servicing. *This access is to be closed permanently once alternate options for basement entry and servicing are provided.*

(8) Development applications for redevelopment of any Block within the sub-precinct is to be accompanied by a traffic management plan that sets out:

a. *proposed measures for managing the effective and safe movement of pedestrians around the site during the construction process,*

b. *how traffic impacts on the surrounding road network will be managed during construction and once the development is operational.*

## 4.4 Built form

### 4.4.1 Block A and Block B building separation

#### Parties which raised this issue:

The City of Sydney

Project Review Panel

#### Issues raised in submission

Building separation distances and setback requirements are to better address interface with surrounding heritage buildings and streets and public spaces, maintain view corridors and address wind issues. The Draft 'Western Gateway Design Guide' should also be amended to provide stronger guidance on the following issues:

- ensuring appropriate building separation distances and setbacks are provided to better address interface with surrounding heritage buildings and streets and public spaces, maintain view corridors and address wind issues. This includes:
  - providing an absolute minimum 30 metre separation with no obstructing cantilevered elements between Blocks A and B. This is consistent with separation distances for a typical Sydney street and will ensure that the view corridor to Marcus Clarke building is maintained,
  - providing a clear lane way that is open to the sky between Blocks A and C (former Parcels Post Office building),

### Project Review Panel recommendations

Due to potential wind impacts, the panel recommended that the proposals adopt a minimum 30m clear separation between the planning envelopes of Block A and B and specified that the additional separation required to achieve 30m should be accommodated within Block B.

### Discussion and response

Transport for NSW recognises the value of retaining adequate building separation distances to maintain important view corridors and address wind issues. In response to this issue, the draft Design Guide for the Western Gateway has been amended to require a minimum 30 metre separation between the tower forms on Blocks A and B. The proponent for Block B acknowledges the PRP's recommendation for additional building separation without any loss of GFA. The 30m has been accommodated within Block B.

Transport for NSW is supportive of the recommendation to provide a clear lane way between Block A and Block C, and this is reflected in the proposed building envelopes and Public Domain Strategy included at **Appendix B**. It is however noted that as Block C does not form part of this application for rezoning, the timing for delivery and design of the Block C component of the pedestrian link will be the subject of a separate planning process for that part of the sub-precinct.

The most optimum architectural design solution for building separation between the tower forms is currently being explored through the Architectural Design Competition.

### Outcome

The revised draft Design Guide (refer to **Appendix A**) has been updated to adopt an increased tower separation of 30 metres between Block A and Block B to enhance view lines to the Marcus Clarke Building and minimise wind impacts.

## 4.4.2 Building height and floor space ratio

### Parties which raised this issue:

Members of the Public

### Issues raised in submissions

Submissions raised a number of considerations in relation to the increases in height being excessive and will increase canyoning, sky-exposure and visual impacts.

### Discussion and response

Central Station Precinct has been earmarked to become a new destination for the local, metropolitan, regional and global community, and will foster the future and economic growth through a new technology and innovation precinct. In stating the above it is also noted that intensification of the Western Gateway sub-precinct and the broader Central Precinct will represent a natural extension of the southern CBD and capitalise on the fact that Central Station is the most connected destination in Greater Sydney and strategically positioned to accommodate future employment and population growth. This is reflective of the draft Central Sydney Planning Strategy, which proposes to introduce a new planning pathway for height and densities to go beyond the established maximum limits to increase growth opportunities in employment floorspace and deliver innovative design. One of these growth opportunities is a potential tower cluster in the Haymarket area, which encompasses the Western Gateway sub-precinct.

Given the likely future built form proposed to occur in the Western Gateway sub-precinct and the broader Central Precinct, open sky views will in some instances be more reflective of a CBD environment. That said, the maximum planning envelopes for both Block A and Block B has been informed by detailed analysis of site-specific opportunities and constraints, technology and innovation tenant requirements, and based on the overall development objectives for the Western Gateway sub-precinct. More specifically, three fundamental factors have underpinned the development of the maximum planning envelopes for Blocks A and B:

- requirements to maintain solar access to Prince Alfred Park
- the provision for a major east-west pedestrian corridor proposed between Blocks A and B
- the need to respect the heritage fabric of the sub-precinct and its broader context.

These parameters have been further refined, specifically for Block B since public exhibition through a collaborative consultation process with the City of Sydney as part of the preparation of the Architectural Design Competition Brief. Proposed refinements to specific elements of the Block B envelope in the Western Gateway Design Guide (refer to **Appendix A**), include:

- the increased tower separation of 30 metres between Block A and Block B to enhance view lines to the Marcus Clarke Building and minimise wind impacts, and
- applying a maximum podium height of RL63.8 (excluding hand rails and balustrades) has been established for Block B in order to complement existing structures and clearly define Lee Street and Railway Square. It will also reinforce the scale of the nearby heritage listed Former Parcels Post Office (i.e. the Adina Hotel).

These refinements have been applied to the revised draft Design Guide for the Western Gateway sub-precinct.

As part of the exhibited Western Gateway Rezoning Proposal, a preliminary analysis of the possible impacts on key views was undertaken taking into consideration views set out in the draft Central Sydney Planning Strategy, the historic view of the Central Station South Wing, the former Parcels Post Office (Block C) and the former Inwards Parcels Shed. Based on the visual impact studies prepared as part of the exhibited Western Gateway Rezoning Proposal, it was concluded that future development on Blocks A and B would not adversely affect identified view corridors, and importantly will preserve defined important views to the Central Station Clock Tower and will also continue to allow the Former Parcels Post Office Building to be viewed in the round, consistent with the current views available to this building.

To ensure these key view corridors are protected, the draft Design Guide for the Western Gateway sub-precinct includes guidance on protecting views and vistas. This will include minimising the impact on existing public views to Central Railway Station Clock tower through modulation of proposed building mass, to maximise the visibility of the clock face. The guidelines will also require any development to preserve views from the western forecourt of Central Station to:

- the Central Station South Wing;
- former Parcels Post Office (Adina Hotel); and
- the former Inwards Parcels Shed.

To address the above requirements of the Design Guide, a detailed Visual Impact Assessment will be required to be undertaken as part of any future detailed development application in the Western Gateway sub-precinct.

## Outcome

The revised draft Design Guide (refer to **Appendix A**) has been updated to reflect the following:

- an increased tower separation of 30 metres between Block A and Block B to enhance view lines to the Marcus Clarke Building and minimise wind impacts, and
- a maximum podium height of RL63.8 (excluding hand rails and balustrades) has been established for Block B in order to complement existing structures and clearly define Lee Street and Railway Square.

### 4.4.3 Building setbacks

#### Parties which raised this issue:

The City of Sydney

#### Issues raised in submissions

The City has suggested that setback requirements should better address the interface with surrounding heritage buildings and streets and public spaces, maintain view corridors and address wind issues. They note the draft 'Western Gateway Design Guide' should be amended to provide stronger guidance on the following issues:

- ensuring appropriate building separation distances and setbacks are provided to better address interface with surrounding heritage buildings and streets and public spaces, maintain view corridors and address wind issues. This includes:
  - ensuring a minimum 3 metre setback above the podium along Lee Street to better address interface with Lee Street and Railway Square, and
  - providing appropriate setbacks between tower elements and a podium in Block B to reduce bulk and scale.

#### Project Review Panel recommendations

In consideration of minimising negative wind impacts through the building envelope design, the panel reiterated the recommendation to provide a minimum 6 metre setback above the podium along the Lee Street frontage and should amend the Western Gateway Design Guide accordingly.

#### Discussion and response

The Project Review Panel has requested a 6 metre setback above the podium along Lee Street to achieve a comfortable wind environment at ground level that is suitable for pedestrians.

The proponent for Block B has undertaken further wind tunnel testing in response to the concerns raised in the submissions, which has confirmed that the south-west corner of Block B currently experiences wind conditions that exceed the relevant safety criterion, and that the suggested 6 metre setback to Lee Street resulted in wind conditions around the south-west corner of the sub-precinct to become measurably worse.

In response to this, further testing was undertaken to identify the most effective design solution to improve wind conditions whilst maintaining the tower envelope and keeping within the envelope controls. The outcome of this testing confirmed that the most effective strategy for mitigating wind impacts along Lee Street was to block the southern colonnade of the building on Block B and wrap an awning around the buildings south-west corner to Lee Street. With these amelioration measures, the wind conditions around the south-west

corner were improved to be better than the existing conditions and maintained similar conditions along Lee Street (refer to Wind Impact Statement at **Appendix E**).

While the results of the technical analysis confirm that the 6 metre upper level setback is ineffective at improving wind conditions, the proponents for Block B acknowledge the concerns raised by City of Sydney and PRP. In response it is therefore proposed to introduce a minimum 6 metre upper level setback requirement along Lee Street within the Western Gateway Design Guide, with the ability to vary the 6 metre setback by a maximum of 3 metres where it can be demonstrated that the reduced setback will not worsen the existing wind conditions along Lee Street, and design quality can be achieved. Such an approach will enable setbacks along Lee Street to be tested through the design competition process, and will provide sufficient to facilitate an innovative architectural response, provided the evidence demonstrates that acceptable wind conditions, design quality and relationship of the tower to surrounding buildings and the public domain can be achieved.

## Outcome

The revised draft Design Guide (refer to **Appendix A**) has been updated to reflect the following:

- Design Guidance 3.1.2 (10), formerly sub-clause (9), will be amended to:

*(10) Built form on Block B is to be in accordance with Figures 3, 4 and 5 relating to building separation and setback distances and:*

*a. is to provide a minimum 6m tower setback above the podium street wall height along the Lee Street frontage.*

*b. a variation to the minimum setback of no greater than 3m will be considered where it can be demonstrated that:*

*i. the podium is set forward of the tower façade line,*

*ii. any future building on Block B is designed to visually read in the streetscape as a building of two parts, including a podium structure with a tower above,*

*iii. the wind environment on the ground plane and in affected public domain areas is appropriate for its intended use.*

*iv. effective articulation and modulation of the podium design is achieved.*

~~*a. Is to provide a tower setback above the podium street wall height along the Lee Street frontage adjacent to Railway Square that:*~~

~~*i. ensures that the podium is set forward of the tower façade line,*~~

~~*ii. ensures that any future building on Block B is designed to visually read in the streetscape as a building of two parts, including a more heavy-set podium structure with a tower above,*~~

~~*iii. supports the achievement of a wind environment on the ground plane that is appropriate for its intended use by pedestrians.*~~

~~*b. a zero setback may be considered along Lee Street immediately adjacent to the Mecure Hotel where:*~~

~~*i. there will be no unacceptable wind impacts felt by pedestrians on the ground plane for the intended purpose,*~~

~~*ii. effective articulation and modulation of the podium design is achieved.*~~

*c. the tower element above the podium on all other facades for Block B may have the same façade alignment as the podium but only where:*



- i. *it is demonstrated that the building design appropriately responds to its surrounding context, particularly nearby heritage items,*
- ii. *there are no detrimental microclimate and public domain impacts,*
- iii. *the façade design incorporates articulation or the like that effectively reduces the visual bulk and mass of the building*

## 4.5 Amenity

### 4.5.1 Overshadowing

#### Parties which raised this issue:

The City of Sydney

The Consortium (proponents of Block B)

Members of the Public

#### Issues raised in submissions

The City have suggested that the Draft 'Western Gateway Design Guide' should be amended to provide stronger guidance on the protection of sun access on existing and future public spaces and places **between 9am-3pm** at mid-winter.

The proposal should ensure that Prince Alfred Park is not overshadowed by the new development.

Furthermore, the proponent of Block B has sought further clarification on proposed sunlight access restrictions to Prince Alfred Park and Henry Deane Plaza proposed by the Western Gateway Rezoning Proposal

#### Prince Alfred Park

There was some minor confusion in the submissions regarding the timeframe for no additional overshadowing (NAO) of Prince Alfred Park. The Draft SEPP Report states that the **current controls under SLEP 2012 will continue to apply (i.e. 12pm to 2pm)** but later states that NAO will apply from 10am to 2pm. The EIE states that the NAO period will be extended to 10am to 2pm but also references other 'nearby parks' which are not nominated. Clarification was therefore asked for with regard to the overshadowing controls that would be applicable to the sub-precinct.

#### Henry Deane Plaza

Clause 3.1.6(1) of the Draft Design Guide requires that development is to ensure that Henry Deane Plaza and other publicly accessible areas receive an appropriate solar amenity for their intended use. However, there is no guidance on what is meant by 'appropriate solar amenity' or how 'publicly accessible areas' would be determined.

### Discussion and Response

#### Prince Alfred Park

Overshadowing of Prince Alfred Park between 12pm and 2pm is currently prohibited under Clause 6.19 (h) of the SLEP 2012. This provision of the SLEP 2012 aims to protect the amenity of key open space assets within the city.

The City of Sydney's draft Central Sydney Planning Strategy (CSPS) and Planning Proposal proposes to further strengthen the sun protection controls for Prince Alfred Park, extending the period of sun access protection to 10.00am - 2.00pm all year round. The proposals for Block A and B have adopted the sun access protection provisions of the

Draft CSPA to inform the proposed building envelopes and proposed amendment to building height provisions.

It is anticipated that once the draft Central Sydney Planning Strategy (CSPA) and Planning Proposal is finalised, the strengthened sun protection controls for Prince Alfred Park, extending the period of sun access protection to 10.00am - 2.00pm all year round will apply to the Western Gateway sub-precinct.

It is noted that the current sun access protection provisions for Prince Alfred Park under the Draft CSPA Solar Access Contour Map will allow for low-scale buildings to be located along the disused rail-siding fronting Prince Alfred Park. The coordinates provided for the Sun Access Plane for Prince Alfred Park are equivalent to a 20m high frontage along the Central Precinct's boundary with Prince Alfred Park. This reflects the current sun access protection provisions for Prince Alfred Park under Clause 6.19 of the Sydney LEP 2012, which will likely result in minor overshadowing along to the western edge of the Prince Alfred Park. The envelopes for Both Block A and Block B have been designed to comply with this extended period of sun access protection from 10.00am – 2.00pm.

#### Henry Deane Plaza

As the objectives and intent of the proposed rezoning are to facilitate comprehensive renewal of the Western Gateway sub-precinct, it is likely that Henry Deane Plaza will be affected by some overshadowing under the proposed future developed scenario. Transport for NSW therefore consider that any guideline should appropriately balance the retention of daylight and solar amenity to Henry Deane Plaza with the overarching intention and objectives for the Western Gateway as the first stage in the broader Central Precinct and the catalyst for Tech Central. The Western Gateway Design Guide has therefore been drafted to include a solar access provision that seeks to ensure that Henry Deane Plaza will continue to receive an appropriate level of solar amenity for its intended use.

#### **Outcome**

The Planning Proposal will result in an amendment to Clause 6.19 (h) of SLEP 2012 that will further strengthen the sun protection controls for Prince Alfred Park, extending the period of sun access protection to 10.00am - 2.00pm all year round.

No change is proposed to the proposed solar access guideline within the Western Gateway Design Guide as this is considered appropriate.

### **4.5.2 Wind Impacts**

#### **Parties which raised this issue:**

The City of Sydney

Project Review Panel

#### **Issues raised in submissions**

The City of Sydney raised that wind mapping and appropriate wind mitigation built into the building envelope must be provided. The wind map should identify appropriate criteria at critical points within the development and in all areas affected by the development. The Draft 'Western Gateway Design Guide' should also be amended to provide stronger guidance on ensuring appropriate management of wind issues, including:

- building envelope design that does not generate public domain wind effects.
- temporary structures such as canopy, awnings or roofs may also be utilised but are not considered sufficient to adequately mitigate wind impacts.

- building separation distances and setbacks need to better address wind issues.
- providing a wind map, which at a minimum, identifies critical points within and in all areas affected by the development.

### **Project Review Panel recommendations**

The panel recommended that wind impacts generated by the proposals need to be addressed at the rezoning stage through changes to the proposed building envelope massing. TfNSW in its RtS should demonstrate that the proposed built forms for Block A and B in the Western Gateway ensure an acceptable wind environment. In particular, sitting in public domain areas, walking throughout the sub-precinct and standing at building entrances should be prioritised.

Regarding the Project Review Panel advice on minimising negative wind impacts through the building envelope design, the panel reiterated the recommendation to provide a minimum 6 metre setback above the podium along the Lee Street frontage, and adopt a minimum 30 metre building separation distance between Block A and Block B.

### **Discussion and response**

Atlassian (Block A) and the Consortium (Block B) have considered the above issues raised in relation to wind impacts, and have undertaken additional detailed wind tunnel testing for the sub-precinct in a number of configurations (refer to **Appendices D and E**). This includes the consideration of the City of Sydney and Project Review Panel's recommendation for a minimum 6 metre setback above the podium along the Lee Street frontage, and a minimum 30 metre building separation distance between Block A and Block B.

#### *Wind Environment around Block A*

Further wind testing has been undertaken by Windtech for Block A, with a particular focus on the wind environment to the north of the site within the proposed future Western Forecourt, the space between Block A and the former Parcels Post Office Building, and Henry Deane Plaza. The results of this additional testing are illustrated in **Figure 6** below and provided in more detail in the supplementary Wind Analysis Statement prepared by Windtech and included at **Appendix D**.



Figure 6. Results of wind testing analysis for Block A

Source: Windtech

Following further testing, Windtech have concluded that wind comfort within the central part of the Western Forecourt to the north of the Block A are able to satisfy the wind comfort standard for standing and comfortable walking criterion. While the area between Block A and the former Parcels Post Office also achieves an appropriate wind environment for standing and comfortable walking.

#### Thirty (30) metre building separation distance

Wind conditions were modelled for the area between Blocks A and B with the results from the wind tunnel testing indicating that the proposed 30 metre separation between Block A and B towers was insufficient in its own right to meet the relevant safety criterion (refer to **Figure 7**).

However, the study found that combining the 30m building separation with the inclusion of localised amelioration measures such as a terrace pavilion between Blocks A and B, wind conditions would significantly improve and provide acceptable levels for the intended use of the space (refer to **Figure 7**). An awning along the eastern façade of Block B building combined with a Terrace Pavilion would further improve wind comfort and safety criteria in this location.

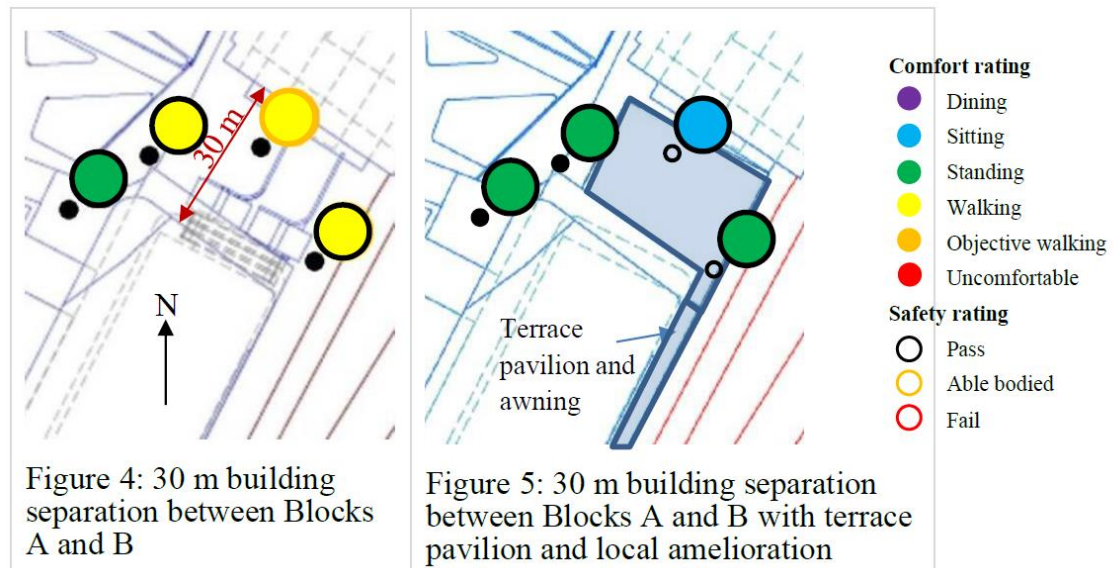


Figure 7. Results around areas between Blocks A and B with 30 metre spacing between towers (Left), and with localised amelioration measures (Right)

Source: ARUP, 2020

#### Lee Street Setback

With regard to the suggested six (6) metre upper level setback from Block B podium fronting Lee Street. Wind tunnel testing undertaken by ARUP concluded that acceptable wind conditions for comfort and safety could be achieved through appropriate design and architectural interventions. It noted that the south-west corner of Block B currently experiences wind conditions that exceed the relevant safety criterion, and that the suggested 6 metre setback to Lee Street resulted in wind conditions around the south-west corner of the sub-precinct to become measurably worse.

With the above in mind, further testing undertaken by ARUP confirms that the most effective solution to improve wind conditions whilst maintaining the tower envelope and keeping within the envelope controls, is to block the southern colonnade of the building on Block B and wrap an awning around the south-west corner. With these amelioration measures, the wind conditions around the south-west corner were improved to be better than the existing conditions and maintained similar conditions along Lee Street (refer to **Figure 8**).

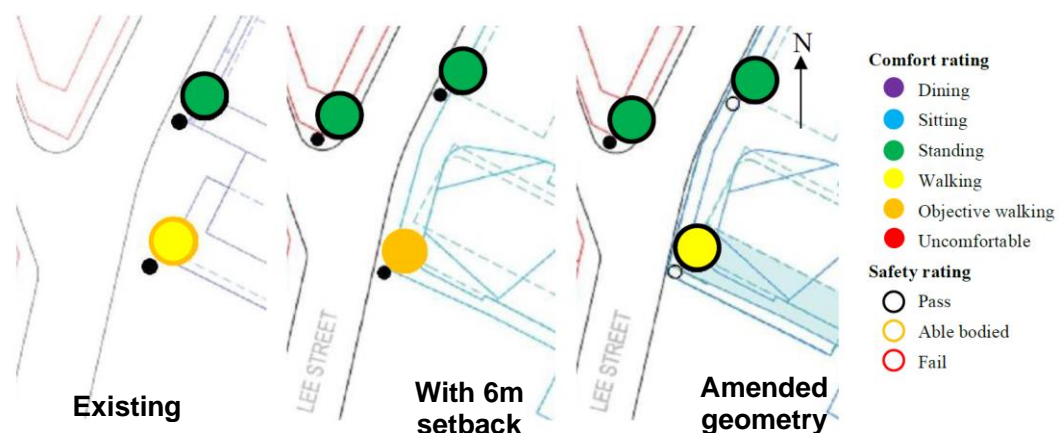


Figure 8. Results around south-west corner of existing conditions (Left), with 6 m setback to Lee Street (Centre), and with 6 m setback and amended geometry (Right)

Source: ARUP, 2020



### Cumulative Wind Conditions

A cumulative wind analysis of Blocks A and B has been undertaken by both proponents and confirms that acceptable wind conditions can be achieved within and around the sub-precinct that is consistent with a CBD scaled environment. As shown in **Figure 9**, wind testing confirms that comfort ratings can be achieved that support walking through to sitting within and around the sub-precinct. Inevitably, wind conditions will change due to the proposed Western Gateway sub-precinct, but importantly the cumulative wind assessment confirms that all areas within and surrounding the sub-precinct achieve safety ratings that pass the relevant criteria. Importantly it is noted that both ARUP and Windtech have undertaken independent cumulative wind assessment using the same building envelope models and have arrived at generally consistent conclusions with regards to the wind effects within and surrounding the sub-precinct.

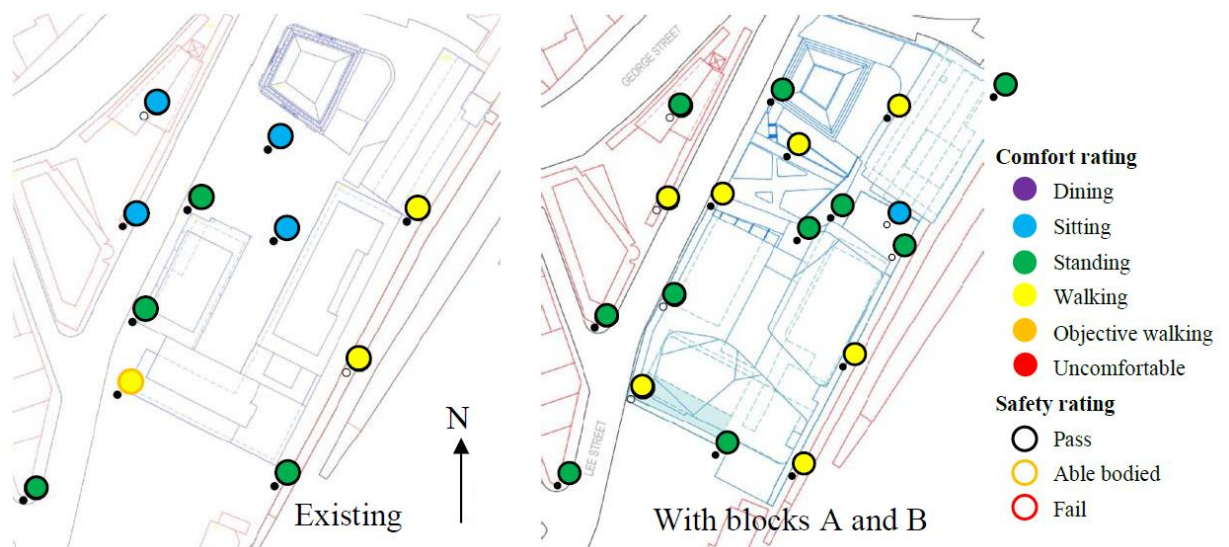


Figure 9. Existing wind conditions compared to results around cumulative wind assessment with Blocks A and B

Source: ARUP, 2020

In response to the outcomes of the cumulative wind analysis undertaken by ARUP for Block B, an appropriate wind comfort criterion map was developed in consideration of the intended purpose, function and uses of various spaces in and around Block B and is presented in **Figure 10** below. Importantly, the Public Domain Strategy (**Appendix B**) has been informed by this wind comfort criterion map to guide the future function and programming of spaces in the public domain.



Figure 10. Appropriate wind comfort criterion map for the Western Gateway sub-precinct

Source: ARUP, 2020

Based on the findings of ARUP and Windtech's wind testing analysis, it has been demonstrated that the wind conditions around the site can be made acceptable for the intended use of spaces within the Western Gateway sub-precinct. This conclusion has been arrived at through detailed wind modelling of the envelopes taking into account the cumulative development scenario for the sub-precinct and has enabled a thorough understanding of the wind flow sensitivities through the sub-precinct.

The further wind testing confirms that:

- An acceptable wind environment can be achieved around Block A including the Western Forecourt and the proposed through site link between Blocks A and C.
- Acceptable wind conditions can be achieved at the Lee Street corner of Block B through architectural treatments including closure of the southern colonnade and wrapping an awning around the building's south-west corner.
- A 30m building separation combined with the inclusion of a roofed terrace pavilion between Block A and B, and an awning along the eastern façade of Block B, will deliver a wind environment that supports standing and sitting within the area between Blocks A and B.

Overall, the cumulative impacts of Block A and Block B developments have been assessed and can meet appropriate wind comfort and safety conditions for the intended use of the spaces, without reliance on temporary structures to mitigate wind impacts.

In addition to the above, it is noted that the final form of proposed buildings on Blocks A and B will not be smaller than the proposed building envelopes (which have been tested in this scenario) and will most definitely include additional detailed design elements that

will further assist with mitigating wind impacts beyond that modelled for the purpose of this rezoning proposal.

Finally, both proponents are committed to undertaking further detailed wind modelling as part their future detailed DA(s), where detailed testing will be undertaken on resolved scheme designs after completion of the competitive design processes for Blocks A and B. The requirement for this detailed testing is clearly set out and mandated in the Western Gateway Design Guide.

### Outcome

As highlighted above, the wind conditions around the site can be made acceptable for the intended use of spaces within the Western Gateway sub-precinct. This will be further resolved after the competitive design processes for the proposals for Block A and Block B, where a thorough understanding of the resulting wind flows can be assessed. No changes are therefore proposed to the proposal or the Western Gateway Design Guide in response to the outcomes of this further analysis.

## 4.6 Sustainability

### Parties which raised this issue:

City of Sydney

Project Review Panel

### Issues raised in submissions

The City notes that the Draft 'Western Gateway Design Guide' must provide higher sustainability targets, including a precinct-wide targets and solutions to achieve net-zero emissions by 2050.

The City recommends that the Draft 'Western Gateway Design Guide' be amended to ensure a number of targets are met. These target's being:

- ensure new development in the sub-precinct is to include an ESD Strategy that demonstrates how the following targets will be met:
  - 6-star NABERS Energy Rating for commercial uses with a commitment agreement
  - 4.5-star NABERS Energy Rating for hotel uses with a commitment agreement
  - 4.5-star NABERS Water Rating for commercial uses
  - 4-star NABERS Water Rating for hotel uses
  - Platinum core and shell WELL Rating (version 2) for commercial uses
  - 6-star Green Star Design and As-Built rating (version 1.2)
- ensure that new development achieves net zero emissions by being highly efficient and using a minimum of 100% renewable electricity and employing other strategies such as maximising on-site generation, purchasing renewable electricity generated off-site and purchasing gold class offsets for remaining energy; and
- ensure new development in the precinct includes an Integrated Water management Strategy.

## **Project Review Panel recommendations**

That ESD performance targets should achieve a high benchmark, and confirmed that TfNSW in its response to submissions should improve the focus and commitment to sustainability in the Western Gateway and the Central SSP as a precinct wide approach with individual projects connecting into the precinct strategy.

## **Discussion and response**

Overall, submissions note that the Western Gateway sub-precinct must be a leading example of best practice sustainability and environmental performance, and that this should include an aim to achieve net-zero emissions by 2050. The City of Sydney therefore recommend amendments to the ESD commitments made within the draft Western Gateway Design Guide. These recommended targets and subsequent proposed changes are outlined and discussed below.

There is no denying that upon completion, the precinct will set a benchmark in world leading sustainability, having been supported by strong commitments and a thorough design and planning process.

The Western Gateway Design Guide provides guidance to ensure that future development incorporates high levels of sustainability and environmental performance measures and initiatives that:

- reduce energy consumption
- reduce carbon emissions
- minimise greenhouse emissions
- reduce the urban heat island effect
- improve air quality
- improve absorption of carbon.

The sub-precinct objectives for sustainability have been informed by policy at both local and state level, as well global commitments including the Paris Climate agreement and the UN Sustainable Development Goals. Furthermore, voluntary and mandatory certification commitments on Green Star, WELL and NABERS have been made to ensure the above objectives are achieved in a credible, robust and measurable way.

The proponents of Block A and Block B have given careful consideration to the recommendations of both the City of Sydney and the Project Review Panel regarding ESD targets and other sustainability initiatives that should be adopted. Whilst they recognise the importance of setting high standards and targets for sustainability, some of the proposed targets recommended by City of Sydney Council cannot be guaranteed at this early stage of the rezoning process due to unknown design considerations. Specifically unknown future inhabitants of the buildings and their operational practices, as well as specific limitations set by the NABERS Energy rating system, and the unknown standards of the Green Star 2020 rating standards (yet to be released) are all factors that make it unfeasible to commit to the targets proposed by the City of Sydney Council.

Since the submission of the Western Gateway Rezoning Proposal, the proponents for Block A and Block B have undertaken a competitive design process, which played an important role in testing achievement of these draft controls. During this design development, it has become apparent that planning controls require flexibility to ensure sustainability aspirations and the tenancy accommodation requirements of technology and innovation tenants are appropriately balanced.

Therefore, whilst some of the City of Sydney's recommended targets are supported, there are a number of factors that make complete compliance with some of the City's recommendations impractical and/or inoperable. These are discussed in **Table 1** below.

**Table 1. Response to City of Sydney recommended sustainability targets**

Exhibited Design Guide targets	City of Sydney submission proposed targets	Revised Design Guide targets	Comments
<b>Targets</b>			
5.5 star NABERS Energy Rating for Commercial Uses	6 star NABERS Energy Rating for commercial uses with a commitment agreement.	Revise exhibited proposal – 5.5-star NABERS Energy Rating for Commercial Uses with a commitment agreement	<p>Both the Consortium (Block B) and Atlassian (Block A) proposed that only a 5.5 star NABERS Energy Rating commitment can be achieved for commercial uses at this stage.</p> <p>The consortium plans to utilise Green Power or LGC's as part of the approach to achieve Net Zero Emission targets. There is currently a penalty in NABERS for targeting 'full electrification' of commercial buildings, conflicting with Net Zero Emissions targets.</p> <p>Atlassian notes that having undertaken their competitive design process it has become apparent that achieving a 6 star rating will be significantly challenging given a requirement for cooperation in the way of occupant behaviour and operation. The current design intent for natural ventilation features result in achievement of a 6 star rating to this regard even more challenging.</p> <p>Given the above a 5.5 star rating minimum standard is considered appropriate.</p>
4.5 star NABERS Energy Rating for hotel uses	4.5 star NABERS Energy Rating for hotel uses with a commitment agreement.	Revise exhibited proposal – 4.5-star NABERS Energy Rating for hotel uses with a commitment agreement.	The Consortium (Block B) are willing to enter into a commitment agreement with NABERS.
4-star NABERS Water Rating for commercial uses	4.5-star NABERS Water Rating for commercial uses	As exhibited.	Both the Consortium and Atlassian note that a 4.5 star rating will be difficult to achieve without full tenant engagement and participation. Without full visibility on final tenant composition and their commitment, it is considered premature to require a 4.5 star rating.



Exhibited Design Guide targets	City of Sydney submission proposed targets	Revised Design Guide targets	Comments
4 star NABERS Water Rating for hotel uses.	4 star NABERS Water Rating for hotel uses.	As exhibited.	This is supported. No change is required.
Platinum Core and shell WELL Rating (version 2) for commercial uses.	Platinum core and shell WELL Rating (version 2) for commercial uses.	Revision to exhibited proposal – Silver core and shell rating.(version 2)	<p>A Platinum WELL rating represents a major investment by the tenant in the productivity of its workers. This investment impacts the rental offer available to the tenant market, adding material cost of tenancy. Many businesses, and especially tech start-up businesses, that may seek to tenant within the Atlassian Building (Block A) or Central Place Sydney (Block B) may not have a model that supports this elevated investment in wellbeing and productivity.</p> <p>A commitment to an elevated WELLS rating at this phase of the planning approval process is also seen as premature as tenant mix between start up and large corporations is unknown.</p> <p>For these reasons, a WELL Silver core and shell rating is proposed for Central Place Sydney (Block B) as it delivers the primary public benefit of health and wellbeing effectively, without imposing an unnecessary and inequitable burden on businesses that are ill-suited to realise the gains of higher WELL ratings.</p>
6 star Green Star Design and As-Built rating (version 1.2).	6 star Green Star Design and As-Built rating (version 1.2).	Target a 6 star Green Star Design and As-Built rating (version 1.2) but achieve a minimum 5 star Green Star Design and As Built rating (version 1.2).	<p>The Consortium and Atlassian will target 6 star Green Star Design and As-Built rating, however at this stage can only commit to a minimum commitment of 5 star. As noted however both proponents are committed to achieving best practice in sustainability and will therefore be striving to achieve a star As-Built rating under the version 1.2 of Green Star.</p> <p>It is also worth noting that an updated Green Star for New Buildings will be released in 2020, superseding current versions. It is likely to be a substantial step change from current Green Star requirements and without full visibility on Green Star for New Buildings, it is premature to require a 6 star rating under the new tool prior to its release.</p>

Exhibited Design Guide targets	City of Sydney submission proposed targets	Revised Design Guide targets	Comments
<b>Energy</b>			
Buildings are to incorporate sustainability measures and initiatives that contribute to achieving net zero emissions by being highly efficient and maximising on-site renewal energy generation.	Achieve net zero emissions by using highly efficient plant and equipment using a minimum of 100% renewable electricity. This could be achieved by maximising on-site generation, purchasing renewable electricity generated off-site and purchasing gold class offsets for remaining energy.	As exhibited.	Atlassian (proponents for Block A) and the Consortium (proponents for Block B) are committed to achieving a net zero outcome. However inclusion of a 100% renewable electricity target is considered unreasonable as other forms of energy will be used in the building such as gas for kitchens and diesel for stand by emergency energy generation (if required). Inclusion of a 100% renewable energy target therefore cannot be agreed, however a net zero emissions approach will be sought by both proponents which makes allowance for the use of gas in commercial kitchens and diesel in emergency and stand-by generation.
<b>Integrated Water Management</b>			
Inclusion of rainwater and /or stormwater harvesting measures to maximise sustainable water reuse.	Integrated Water Management Strategy should be provided that:  Incorporates rainwater and/or stormwater harvesting measures to maximise sustainable water reuse, including irrigation for publicly accessible spaces	As exhibited.	Rainwater/stormwater harvesting measures will be included on site.
Dual plumbed water systems to enable utilisation of the recycled water network for all permitted non-potable uses, such as flushing, irrigation, firefighting and certain industrial purposes.	Illustrates how building will reuse water for all permitted non-potable uses such as flushing, irrigation, firefighting and certain functional purposes.	As exhibited.	This is supported. The exhibited Draft Design Guide's requirement for all new development to provide an Integrated Water Management Strategy that illustrates how buildings will be designed to maximise water efficiency.  These initiatives will be further investigated and confirmed when the design has been further progressed, rather than at rezoning stage and/or prior to completion of the Architectural Design Competition.

Exhibited Design Guide targets	City of Sydney submission proposed targets	Revised Design Guide targets	Comments
Consider the potential for a precinct scaled recycled water scheme.	Includes a precinct-scale recycled water scheme that can connect to future networks including but not limited to the George Street network.	As exhibited.	This is not supported. On its own, both the Atlassian building (Block A) and Central Place Sydney (Block B) are ill-suited to provide on-site water recycling facilities due to their largely single use nature for offices and commercial uses. Single-use commercial developments do not typically have the consistency or quantity of waste-water flows to effectively operate water recycling facilities.
Development is encouraged to provide centrally plumbed hot water systems within buildings to provide more efficient delivery of hot water.	Provides more efficient delivery of hot water through centrally plumbed hot water systems within buildings.	As exhibited.	TfNSW and proponents for Blocks A and B are committed to providing a more efficient delivery of hot water through centrally plumbed hot water systems within buildings.
New development is to consider and include Water Sensitive Urban Design (WSUD) measures to improve stormwater quality flowing into waterways and potentially include: Gross pollutant traps; Passive irrigation; Bio-retention areas; and Rainwater harvesting.	Incorporates, not just consider, water sensitive urban design and green walls and roofs.	New development is to incorporate water sensitive urban design measures where possible.  Retain wording to encourage the incorporation of green walls and roofs.	Water Sensitive Urban Design measures will be included within the Western Gateway sub-precinct wherever possible, however neither proponent is able to commit to incorporating green walls and roofs at this stage of the process as that is a detailed design matter and green walls/roofs are not always a practical solution for many buildings.
<b>Waste Management</b>			
Measures to reuse or recycle at least 80% of construction and demolition waste.	90% recovery of construction and demolition waste	Update to reflect 90% recovery of construction and demolition waste.	The proponents are committed to maximising reuse and recycling of construction and demolition waste and therefore agree to increase this target to 90%.
Manage operational waste in accordance with the City of Sydney Policy for Waste Minimisation in New Developments.	90% recovery of waste from industrial, commercial operations and other uses.	Retain as is.	The guidelines have been drafted to align with the City of Sydney Council's current policy for Waste Minimisation in New Developments, which is considered to be appropriate as it includes updated provisions to managing operational waste. It is considered that 90% recovery of operational waste in an unfeasible target.

Exhibited Design Guide targets	City of Sydney submission proposed targets	Revised Design Guide targets	Comments
			It is also noted that neither proponent is in a position at this phase of the planning process to commit to a 90% recovery target of waste from tenant operations and other uses.

## Outcome

While most of the targets proposed by City of Sydney can sought to be achieved, as demonstrated above, the full extent of the recommended sustainability targets are understood to be too onerous at this early stage within the rezoning proposal. Notwithstanding, both proponents for Blocks A and B are targeting the implementation of a sustainability strategy that will deliver a best practice outcome for their respective developments, and which set a high sustainability benchmark for future development within the broader Central Precinct.

The Western Gateway Design Guide has been amended to clarify and set out the above commitments. Specifically:

- Design Guidance 3.4.1, Objective (e) of has been amended, as follows:
 

*(e) Ensure development incorporates best practice sustainability and environmental performance measures and initiatives for individual development sites and the whole precinct that:*

  - ~~i. reduce energy consumption~~
  - ~~ii. reduce carbon emissions~~
  - i. minimise greenhouse **gas** emissions
  - ii. **Demonstrate innovation in reducing greenhouse gas emissions through energy efficiency, renewable energy and other measures.** ~~and greenhouse gas emissions abatement~~
  - iii. reduce the urban heat island effect
  - iv. **achieve high levels of waste separation and diversion from landfill**
  - v. **minimise consumption of mains potable water**
  - vi. **improve air quality**
  - ~~vi. improve absorption of carbon.~~
- Guideline 3.4.1 (1) has been amended to include updated sustainability targets:
  - a. NABERS Energy Rating for commercial uses - 5.5 star **with a Commitment Agreement**
  - b. NABERS Energy Rating for hotel uses - 4.5 star **with a Commitment Agreement**
  - c. NABERS Water Rating for commercial uses – 4 star
  - d. NABERS Water Rating for hotel uses – 4 star
  - e. Well Rating – ~~Platinum~~ **Silver** core and shell (with commitment agreement)
  - f. Green Star Design and As-Built Rating - **Target a 6 star Green Star Design and As-Built rating (version 1.2) but achieve a minimum 5 star Green Star Design and As Built rating (version 1.2)**
- A new design guideline has been inserted at 3.4.1 (2), as follows:

*(2) An alternate ESD Strategy(ies) may be accepted where the consent authority is satisfied it will deliver an outcome that is equal to or better than the minimum standards set out in 3.4.1(1).*

- Design guidance 3.4.1 (4) has been updated to:

*(4) All new buildings ~~should~~ **are to** be designed to incorporate suitable self-shading elements to minimise undesirable ~~summer afternoon~~ solar gain and improve the passive sustainability performance of buildings*

- Design guidance 3.4.1 (5) has been updated to:

*(5) Development is encouraged to ~~incorporate~~ **apply the principles of biophilia in design, such as incorporating** green walls and roofs.*

- Design guidance 3.4.2 (1) has been updated to:

*(1) All new development is to provide an Integrated Water Management Strategy that illustrates how buildings will be designed to maximise water efficiency. ~~This should consider~~ **The strategy should:***

- a. **Include provision of** dual plumbed water systems to enable utilisation of the recycled water network for all permitted non-potable uses such as flushing, irrigation, fire fighting and certain industrial purposes*
- b. **Identify how** rainwater and / or stormwater will be harvested and reused on site to maximise sustainable water reuse*
- c. **Consider how the development can contribute to a** ~~the~~ potential future precinct scaled recycled water scheme.*
- d. **Identify opportunities for water sensitive urban design including green walls and roofs***

## 4.7 Design Quality

### 4.7.1 Competitive design process

#### Parties which raised this issue:

The City of Sydney

#### Issues raised in submissions

Clarifying that in the event that a competitive design process is undertaken in accordance with the City's Competitive Design Policy, it is to:

- be an invited architectural design competition involving no less than five competitors (instead of four as indicated in the Draft 'Western Gateway Design Guide') from a range of emerging, emerged and established architectural practices with at least 50% local architects as the lead architect.
- The Draft Design Guide should specify that architectural design competitions involve no less than five competitors.

#### Discussion and response

In response to this, Section 3.1.3 (2) of the Western Gateway Design Guide has been amended to include a reference that the competitive design process is to be undertaken in accordance with the City of Sydney Competitive Design Policy, where nominated. Furthermore, the reference to involving no less than four (4) competitors has been removed from the revised Design Guide.

The City of Sydney Competitive Design Policy identifies that a minimum of five (5) competitors are required for invited architectural design competitions, which will be relied upon to outline the submission requirements for design competitions in the Western



Gateway sub-precinct. The range of architectural practices to be involved in architectural design competitions will be determined in the Architectural Design Competition Briefs for Blocks A and B.

Section 3.1.3 (2) has also been revised to clarify that in the event that a competitive design process is undertaken in accordance with the City of Sydney Competitive Design Policy, this Western Gateway Design Guide satisfies the requirement for a design excellence strategy and a Development Control Plan to be prepared as it relates to land within the sub-precinct. This has also been confirmed through discussions between the Consortium and the City of Sydney in relation to the competitive design process for Block B.

The amendments to the draft Western Gateway Design Guide provide clarity of requirements for future development applications.

## Outcome

The revised draft Design Guide (refer to **Appendix A**) has been updated to reflect the following:

- Design Guidance 3.1.3 will be amended to:

*(1) ~~All buildings~~ Each Block within the sub-precinct ~~are~~ is to be the subject of a competitive design process and undertaken in accordance with the applicable design excellence competition guidelines of the Government Architect NSW or the City of Sydney Competitive Design Policy (Policy).*

*(2) No additional floorspace or building height under Clause 6.21(7) of the Sydney LEP 2012 will be awarded for a building demonstrating design excellence. The maximum floorspace and building height for sites within the Western Gateway sub-precinct is to be in accordance with Clause [XX] of the Sydney LEP 2012.*

*(3) ~~In the event that a competitive design process is undertaken in accordance with the City of Sydney Competitive Design Policy, it is to:~~ b. Be an invited architectural design competition involving no less than four (4) competitors from a range of emerging, emerged and established architectural practices, with no more than 50% of competitors from international practices. c. Be determined by a five (5) member jury in accordance with Part 3.4 of the Draft Government's Architect's Design Excellence Competition Guidelines (dated May 2018). Where a competitive design process is undertaken in accordance with the City of Sydney Competitive Design Policy, it is to be in accordance with the following design excellence strategy:*

*a. Undertake an invited architectural design competition involving no less than five (5) competitors from a range of emerging, emerged and established architectural practices, with no more than 50% of competitors from international practices.*

*b. The Jury composition is to be in accordance with the Provision 3.2 Jury Composition of the Policy or a five (5) member jury in accordance with Part 3.4 of the Draft Government's Architect's Design Excellence Competition Guidelines (dated May 2018).*

## 4.7.2 Active frontages

### Parties which raised this issue:

The City of Sydney

### Issues raised in submissions

City of Sydney recommend maximising street and laneway activation both during the day and night (i.e. increasing the active frontage requirement to 80 per cent). Active spaces should also be designed to address flooding issues and cater to a diverse range of

businesses and uses, including smaller scale retail, entertainment, food and drink, arts and cultural uses.

### Discussion and response

Transport for NSW agrees that activation of the public domain is intrinsic to the overall project. However, it should be recognised that portions of ground frontage for Blocks A and B cannot be activated as they perform an access, servicing and maintenance functions and / or they are constrained by existing heritage structures that are present along the frontage and would inhibit the ability to achieve the minimum level of activation. The exhibited draft Design Guide for the sub-precinct identified a minimum of 75% of building frontages along the public domain to be activated, which is considered sufficient to ensure ground floor frontages to the public domain are predominately activated and has been retained.

Following further consideration of this clause it was determined that further clarity was required within the control with regards to defining which public domain areas within and adjoining the sub-precinct needed to be activated. Accordingly, the design control has also been amended to address this matter.

In response to comments with regard to the design of frontages addressing flooding constraints, Design Guidance 3.1.4 (6) will be refined to remove the exclusionary passage for flood affected frontages. Design measures (i.e. internal level changes) may be implemented to manage flooding issues.

### Outcome

The revised draft Design Guide (refer to **Appendix A**) has been updated to reflect the following:

- Design Guidance 3.1.4 (1) has been amended to:  
*(1) A minimum of 75% of building frontages along the public domain should be activated ~~building frontages along the public domain should be activated by~~ through the inclusion of retail, commercial lobbies or other active uses. For the purpose of this guideline public domain means the area shaded in yellow shown in Figure 2: Public domain and pedestrian connections, as well as Lee Street and the Western Forecourt.*
- Design Guidance 3.1.4 (3) has been amended to:  
*(3) Fine grain ~~retail~~ tenancies ~~should~~ must be located along key pedestrian movement corridors and should cater to a diverse range of businesses including retail, entertainment and food and drink.*
- Design Guidance 3.1.4 (6) has been amended to:  
*(6) ~~Where not constrained by flooding,~~ Building entrances are to be designed to be at the same level as the adjoining public domain.*
- New Design Guidance 3.1.4 (9) has been added as follows:  
*(10) Notwithstanding the above, achieving the minimum 75% active building frontage on Blocks which contain heritage items may not be achievable due to the existing heritage fabric or other constraints. In these circumstances active frontages should be maximised as much as possible dependent on heritage values of the building and should respond positively to the objectives of this clause.*

## 4.7.3 Building efficiencies

### Parties which raised this issue:

City of Sydney

## Issues raised in submissions

The City suggest that the Draft 'Western Gateway Design Guide' should be amended to provide stronger guidance on building efficiencies which ensure building massing and envelopes provide flexibility for articulation and other design features in subsequent detailed design stages (i.e. applying 75-80% per cent envelope efficiencies to ensure that building massing and envelopes provide flexibility for articulation and other design features in subsequent detailed design stages).

It has been recommended that a 75-80% envelope efficiency is outlined in Transport for NSW consider that these reports appropriately outline the overall approach to traffic management for the purposes of the rezoning stage for the Western Gateway sub-precinct. Further details of traffic management, including the preparation of an overarching transport strategy for the sub-precinct, will be considered at the development application stage.

## Discussion and response

The planning envelopes for Blocks A and B established in the Western Gateway Design Guide have been deliberately structured to provide sufficient flexibility in order to facilitate an effective competitive design process by enabling the building form to modulate within the envelope, which is considered essential to encourage innovative and excellence in design.

In response to the matters raised by the City of Sydney the Western Gateway Design Guide has been amended to include a definition of Gross Building Area (GBA) as well as a new control that requires a maximum Gross Floor Area (GFA) to Gross Building Area (GBA) ratio of 80%. This equates to ensuring an envelope efficiency of the level recommended by the City of Sydney. This will address the matters raised in the submissions whilst still providing sufficient allowance to implement articulation and other design features in subsequent detailed design stages.

## Outcome

In consideration of the above, the Western Gateway Design Guide has been updated to include a new definition for GBA, as well as including the requirement for a maximum 80% envelope efficiency. That is, any new building on either Block A or Block B will not comprise a GFA that is than 80% of the GBA of the planning envelope as set out in the Western Gateway Design Guide. Specific amendment that have been made to the Design Guide are as follows:

- A new definition for Gross Building Area has been added to section 2.1 as follows:

*The total enclosed and unenclosed area of the building at all building floor levels measured between the normal outside face of any enclosing walls, balustrades and supports that could be theoretically achieved within the defined planning envelope inclusive of any cantilever zone (as per Figures 3, 4, 5 and 6 of this Design Guide). The unit of measurement for building areas is the square metre*

- A new design guidance is provided under 3.1.2 (2) of the Design Guideline, as follows:

*(2) New buildings within Block A and Block B are to have a maximum 80% envelope efficiency (i.e. the final building design should not have a Gross Floor Area that exceeds 80% of the Gross Building Area that is able to be achieved within the envelope).*

## 4.8 Infrastructure planning and contributions

### Parties which raised this issue:

City of Sydney

UTS

Members of the public

Project Review Panel

### Issues raised in submissions

The City of Sydney's submission raised that infrastructure needs for the Western Gateway sub-precinct should be determined prior to considering any uplift and changes to the planning controls. A holistic consideration of both State and local infrastructure should include a needs assessment and a framework for contributions and timely delivery. The City recommends that:

- consideration of the specific needs of highly skilled workers in innovative and knowledge-based sectors, current and future transit users and changing local community surrounding the sub-precinct;
- provision of a definitive framework for development contributions to ensure commitment for and timely delivery of infrastructure through the subsequent development approval processes.

The Project Review Panel recommended TfNSW in its RtS provide an infrastructure needs assessment, a framework for contributions and a schedule for the potential delivery of State and local infrastructure

### Discussion and response

The Western Gateway sub-precinct has been accelerated by the NSW Government, with the Western Gateway identified by the Minister as being appropriate for early assessment and consideration in advance of the broader Central Precinct Renewal Program. The proposal for Blocks A and B will be making a significant contribution to the Western Gateway sub-precinct through a package of public works which will provide a pivotal catalyst function in delivering the NSW Government's strategic planning outcomes for the Central Precinct. These public works are described in **Table 2** below.

**Table 2. Proposed public works to be delivered in-kind by Block A and Block B**

Block A	Block B
<ul style="list-style-type: none"> <li>Delivering a high quality through-site pedestrian connection from the proposed Sydney Metro egress to Henry Deane Plaza which accommodates pedestrian forecasts to 2056.</li> <li>Connecting into the integrated Western Gateway Sub-Precinct Basement which enables future north south connections through the site.</li> <li>Facilitating the creation of a logical land tenure arrangement which enables the NSW Government to control public spaces and NSW Government assets.</li> </ul>	<ul style="list-style-type: none"> <li>Delivering the Integrated Distribution Facility which will provide critical services infrastructure for deliveries, waste management, and utilities, not only supporting development within the Western Gateway but also the broader Central Station Renewal Program</li> <li>Delivery of the southern access road to facilitate the removal vehicular access and pedestrianise Lee Street and Ambulance Avenue</li> <li>Delivery of managed vehicular access to future OSD</li> <li>Provide connection from the IDF and southern access road into adjacent basements facilitating the integrated basement for the Western Gateway</li> </ul>

<ul style="list-style-type: none"> <li>• Providing opportunities for the NSW Government to remove vehicular access and pedestrianise Lee Street and Ambulance Avenue</li> <li>• Providing a contribution towards the NSW Government's commitment to creating affordable spaces for start up within the new Tech Central.</li> </ul>	<ul style="list-style-type: none"> <li>• Delivering high quality through site pedestrian connection from Henry Deane Plaza to the future over station development</li> <li>• Provision of additional high-quality pedestrian through site links to support secondary pedestrian connections</li> </ul>
---	--

The above public works for Blocks A and B will be formalised as works in kind through a Project Delivery Agreement (the Consortium) / or through a planning agreement (Atlassian) with the NSW Government. In addition to these works in kind, both developments the Western Gateway Rezoning Proposal will commit to paying monetary contributions to the City of Sydney in accordance with the current Section 61 Contributions Plan and delivering public art as part of any future development consent.

The collective benefit of the works in kind package, Section 61 and public art contributions offers a total value exceeding the local contributions City of Sydney could expect to receive under a traditional development application process by a significant margin.

In relation to State infrastructure, delivering the integrated distribution basement enables coordination of strategic innovation and tech uses hand-in-hand with State and Local Governments' significant infrastructure investment. Importantly, it will complement and support the State Government's significant investment in new public transport infrastructure, additional pedestrian capacity, open space and public domain within the Western Gateway and across the Central precinct more broadly. This piece of infrastructure will also be fundamental to the success of the broader Central Precinct Renewal Program, and in particular it will enact as an enabler for future over station development.

The capacity, or the ability to augment the capacity, of the other essential infrastructure needed to deliver the project (electricity, water supply, telecommunications, drainage and sewage treatment etc.) enabled by the rezoning proposal should rightly be documented in future development applications. Both proponents for Block A and Block B will accept to fund any required upgrades to essential infrastructure for its development.

The City of Sydney's recommendation that the overarching infrastructure framework for the Central Precinct should be resolved is acknowledged. However, the finalisation of a precinct wide infrastructure framework should not preclude the Western Gateway Rezoning Proposal from proceeding, particularly when the timing around the draft Central Sydney Planning Strategy and the City of Sydney's infrastructure funding framework is still uncertain as it is still to go through exhibition and assessment.

Notwithstanding the above, an infrastructure needs assessment will be undertaken to develop a contributions framework and infrastructure schedule as part of Stage 2 of the SSP Study for the broader Central Precinct. This will take into consideration the anticipated need for local infrastructure (e.g. open space, community facilities, libraries, childcare, cycling facilities etc.) and State and regional infrastructure needs (e.g. public transport, health facilities, emergency services, education etc.) for the entire Central Precinct (including the Western Gateway sub-precinct) to ensure a holistic approach is undertaken with regard to infrastructure delivery.

## Outcome



- The proposed public works for Blocks A and B will be formalised as works in kind through a Project Delivery Agreement (the Consortium) / or through a planning agreement (Atlassian) with the NSW Government.
- Payment of monetary contributions consistent with the existing City of Sydney Section 61 Contributions Plan as part of any future development consent for Block A and Block B.
- The proposed public works for Blocks A and B will be largely delivered via works in kind, and proposed to be formalised through a Project Delivery Agreement (the Consortium) / or through a planning agreement (Atlassian) with the NSW Government.

## 4.9 Planning objectives and priorities

### Parties which raised this issue:

The City of Sydney

Project Review Panel

### Issues raised in submissions

The Project Review Panel noted that the exhibited materials do not appropriately address the objectives and planning priorities in the Greater Sydney Region Plan and Eastern City District Plan. In particular:

- Consideration of a range of initiatives to address affordable rental housing (Objective 11);
- Consultation with Local Aboriginal Lands Councils (Planning Priority E4);
- Investigation of opportunities for precinct-based provision of adaptable car parking and infrastructure (Objective 12, Planning Priority E6);
- Identification and conservation of heritage (Planning Priority E6);
- Strengthening international competitiveness of the Harbour CBD and growing its vibrancy (Planning Priority E7);
- Delivering integrated land use and transport planning and a 30-minute city (E10); and
- Supporting growth of targeted industry sectors, in particular tourism and visitation and night time economy (Planning Priority E13).

It was recommended that TfNSW's response to submissions should address the objectives and priorities listed above.

### Response

Careful consideration was given to the objectives and planning priorities in the Greater Sydney Region Plan and Eastern City District Plan during the development of the Western Gateway Rezoning Proposal and in the preparation of the supporting exhibition documentation.

A detailed response to the specific objectives and planning priorities identified by the Project Review Panel are addressed in the **Table 3** below.

**Table 3. Response to specific objectives and planning priorities in the Greater Sydney Region Plan and Eastern City District Plan**

Recommendations	Response
Consideration of a range of initiatives to address affordable rental housing (Objective 11)	<p>The Western Gateway Rezoning Proposal intends to implement a site-specific clause for alternate building height and gross floor area controls (despite Clauses 4.3 and 4.4 of the Sydney LEP 2012), where development is for the purposes of non-residential land use only.</p> <p>Residential development on this land would be contrary to the objectives and intended outcomes of the proposed SEPP and would impact on the aspiration to deliver 14,600 new jobs in Central Sydney, as part of the first stage of the broader renewal program for the Central Precinct. Initiatives to address affordable rental housing are precluded by the proposed restriction of residential development in the Western Gateway sub-precinct.</p>
Consultation with Local Aboriginal Land Councils (Planning Priority E4)	<p>Transport for NSW is committed to consulting with all relevant Aboriginal community stakeholders, including Local Aboriginal Lands Councils. An Aboriginal Engagement Strategy will be developed and implemented to allow for authentic engagement with Aboriginal stakeholders and communities (including Local Aboriginal Land Councils) as part of Stage 2 of the Central Precinct SSP Study. This will investigate opportunities to showcase the culture and identity of Aboriginal communities which intended to be explored and presented through an integration of key values and narratives in the landscaping, built forms, public spaces, public art and interpretation.</p> <p>For the Western Gateway, consultation with the Local Aboriginal Lands Council and other Aboriginal community stakeholders will be undertaken to inform the preparation of any future Development Application(s).</p>
Investigation of opportunities for precinct-based provision of adaptable car parking and infrastructure (Objective 12, Planning Priority E6)	<p>The integrated distribution facility (IDF) provides opportunities for precinct-based solutions to the provision of both adaptable car parking and infrastructure. The IDF will deliver future proofed infrastructure with shared logistics, waste and building services to enable smart, integrated and sustainable development. The IDF will provide integrated basement facilities for the whole precinct, including the future Over Station Development at Central Station. The IDF will not be strata titled, enabling its design and operation to adapt to changing circumstances and technological innovation.</p>
Identification and conservation of heritage (Planning Priority E6)	<p>Both proposals for Block A and Block B have been supported by Heritage Impact Statements which provide a detailed analysis of the heritage context and details measures to guide detailed development design.</p> <p>For Block A, a comprehensive Conservation Management Plan for the subject YHA Railway Square site is being prepared as part of the Block A's State Significant Development Application process which will recommend that a robust heritage interpretation plan is prepared to ensure that the significance of the broader parcels precinct is interpreted and understood.</p> <p>Block B does not accommodate any locally or State heritage listed building/items and does not have any inherent heritage value. The Heritage Impact Statement for Block B outlines a number of Heritage Design Guidelines that aim to support mitigation of potentially adverse heritage impacts to surrounding items of significance and guide the development of an interpretation strategy.</p>

Recommendations	Response
<p>Strengthening international competitiveness of the Harbour CBD and growing its vibrancy (Planning Priority E7)</p>	<p>Detailed discussion on the importance of the Consortium's project in strengthening international competitiveness and growing the CBD's vibrancy is provided in the Western Gateway SEPP Amendment Report (pg. 32 &amp; 69).</p> <p>The Rezoning Proposal aligns with Eastern District's Planning Priority E7 to grow a stronger and more competitive Harbour CBD by providing the opportunity to extend Sydney's global capabilities as part of the emerging Innovation Corridor on its western edge. Overall, the project will strengthen international competitiveness by:</p> <ul style="list-style-type: none"> <li>• achieving the scale and quality to attract international brands and tenants</li> <li>• catalysing the creation and emergence of Sydney's Innovation Corridor as envisaged by the State Government</li> <li>• incorporating iconic architectural, design and sustainability features that help to capture the local and international public attention and demonstrating Sydney's leadership on global agendas</li> <li>• delivering a high experience, high amenity setting with a widely recognised flagship public/cultural space.</li> <li>• deliver a world class public realm with lively retail, dining and entertainment attractions that will invigorate Sydney's day-time and night-time economy.</li> </ul>
<p>Delivering integrated land use and transport planning and a 30-minute city (E10)</p>	<p>The Western Gateway Rezoning Proposal is an exemplar proposition of land use and transport integration, delivering a dynamic civic space and workplace in coordination with major investment in transport infrastructure at Central Station.</p> <p>Its location offers unrivalled connectivity to public transport services, providing direct pedestrian access to country and metropolitan rail services, the light rail and interstate, regional and metropolitan bus services. This integration of land use and transport planning will be further enhanced with the future Sydney Metro services at Central Station and significantly improved pedestrian linkages between the station, the Western Gateway sub-precinct and beyond.</p>
<p>Supporting growth of targeted industry sectors, in particular tourism and visitation and night time economy (Planning Priority E13)</p>	<p>The Western Gateway Rezoning Proposal is planned to bring unique retail and dining experiences as well as cultural and creative activations that will increase visitation and grow the night-time economy in the southern end of the CBD.</p> <p>The proposal for Block A incorporates the YHA which will support Start-up visitors seeking to minimise costs during their start-up phase and provide affordable accommodation to students visiting Sydney on educational and cultural programs.</p> <p>Redevelopment of Block B will significantly improve the built environment through the provision of better public spaces, mixed-use development, high quality streetscapes and activation of the urban domain. The development will catalyse higher value land uses across the precinct such as retail, commercial, food and entertainment attractions. The proposed pavilion at the eastern end of the site will be a publicly accessible and programmable space that can be used for cultural, community and arts activities.</p> <p>Overall, the transformation of the Western Gateway sub-precinct in this way will provide strong support for growing tourism, visitation and the night time economy.</p>

## 5 The Revised Proposal

---

### 5.1 Revised Concept Proposal for Block A and Block B

#### 5.1.1 Block A

Following the release of the draft planning controls, Atlassian has undertaken a competitive design process which concluded in late December 2019. The design competition winning scheme for Block A has been developed further in close consultation with the climate engineers to create a living and breathing building, with a highly adaptive workspace for future occupants, entirely within the planning envelope exhibited. A critical part of this has been the design of a series of atrium spaces. These spaces are a function of the building's broader natural ventilation strategy which seeks to reduce the reliance on conventional air-conditioning systems in an attempt to reduce the buildings carbon footprint.

Given the building envelope is fixed, the climate engineering is being resolved internally within the envelope there is no impact on urban design, structural and spatial requirements or any change in the way the building sits or is perceived in the public realm. However, amendments to the proposed planning framework will be needed to support this outcome (refer to **Section 5.2**)

#### 5.1.2 Block B

The Consortium has revised its proposal for Block B to respond to feedback received during the public consultation process and ensure stronger alignment with the Architectural Design Competition.

The Draft Design Guide has been revised to reflect the amended Block B building envelope (refer to **Appendix A**).

##### **Terrace Pavilion**

The Western Gateway sub-precinct will operate as the first completed and operational sub-precinct of the broader Central Station Precinct. Therefore prior to the operation of the OSD portion of the Central Precinct, the interface of the Western Gateway sub-precinct with the future OSD deck may not provide an appropriate environment if not appropriately designed and activated.

The long term vision for the area between Block A and Block B is to provide the Devonshire Street Link within Block B, connecting Lee St and Henry Deane Plaza through to the Over Station Development (OSD) deck on to Devonshire Street in Surry Hills. The connection from Block B will comprise lifts, escalators and a series of steps and landings from RL 16 to the OSD deck at RL 30, largely to be utilised as a pedestrian access way, accompanied with a series of green public terraced spaces that integrate with the adjacent building on Block B.

In the initial term, prior to the completion of the OSD, there is a need to activate this space so that it makes a positive contribution to the sub-precinct. To achieve this the stairs and landings are to be completed up to a Terrace Pavilion located at RL 21, as part of the Block B development. The Terrace Pavilion is to be designed as a publicly accessible and programmable space, allowing for enhanced amenity, usability and activation – including retail, commercial and community uses. The Pavilion's structure will enclose and protect the spaces whilst being a structure that is impressive in its design and shape. The design and use of the Pavilion can be a contributor to the heritage interpretation of the precinct,

and can assist to achieve the ESD objectives for Block B, contributing to a reduction in the heat island effect, whilst supporting climate change resilience by providing shade during elevated heat events.

Further details of how this space is envisaged to look and work within the context of the Western Gateway sub-precinct are set out in the accompanying Public Domain Strategy at **Appendix B**.

It is for above reasons that this proposed new terrace pavilion is considered an acceptable and positive contribution to the public domain of the Western Gateway sub-precinct.

### **Increased building separation of 30 metres**

In response to the issue of inadequate building separation between Block A and Block B, as raised by the City of Sydney and the Project Review Panel, the draft Design Guide for the Western Gateway has been amended to require a minimum 30 metre separation between Blocks A and B. The Consortium (proponent for Block B) acknowledge the recommendation to accommodate the additional building separation without any loss of GFA. The 30m has been accommodated within Block B.

### **Provided an above podium setback to Lee Street**

In response to the concerns raised about the above podium setback to Lee Street, it is proposed to introduce a minimum 6 metre upper level setback requirement along this frontage within the Western Gateway Design Guide. The design guidance will however allow for this 6 metre setback to be reduced to a minimum of 3 metres where it can be demonstrated that:

- the podium is set forward of the tower façade line
- any future building on Block B is designed to visually read in the streetscape as a building of two parts, including a podium structure with a tower above
- the wind environment on the ground plane and in affected public domain areas is appropriate for its intended use
- effective articulation and modulation of the podium design is achieved.

### **Podium height**

The maximum podium height has been slightly adjusted from RL 63 to RL63.8. The Draft Design Guide has been revised to reflect the amended Block B building envelope (refer to **Appendix A**).



## 5.2 Amendments to the rezoning proposal

### 5.2.1 Winter Gardens and impact on gross floor area controls

In undertaking their competitive design process for Block A, Atlassian has identified that the existing planning controls do not provide sufficient flexibility to achieve their sustainability aspirations, particularly with regard to their design and sustainability strategy which includes a series of wintergarden atrium spaces across multiple levels. The reason for including these spaces is because they significantly contribute towards beneficial sustainability outcomes including natural ventilation, solar access and thermal comfort. These innovative large scale wintergarden zones are designed to be fully passive, and climate controlled through an operable louvre system across the four office levels adjacent to the void space, and are critical to the delivery of a mixed mode building with the opportunity to create a highly sustainable design outcome which will be an exemplar for Sydney and the world.

The configuration and location of these spaces within the Block A building is shown in **Figures 11 and 12**, while **Figure 13** provides artists impression of how these spaces are intended to look and function once the building is complete. Further details are also provided in the response prepared by Urbis on behalf of the proponents for Block A (refer to **Appendix D**)

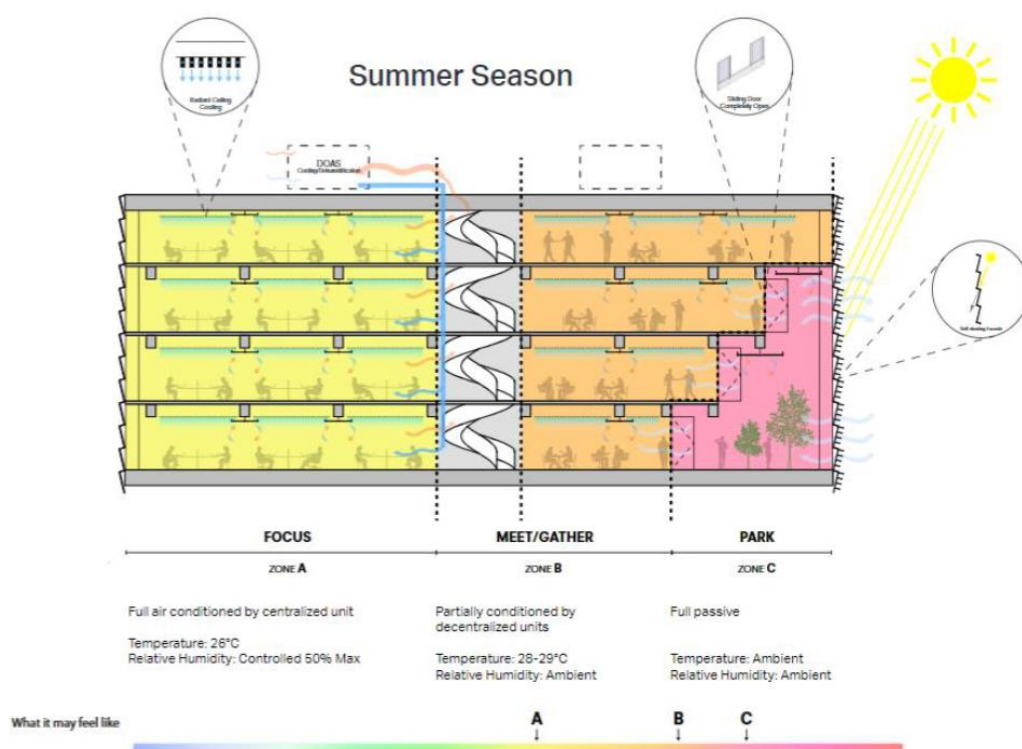


Figure 11. Delineation of naturally ventilated space (Zone C), naturally ventilated with mechanical control (Zone B), and innovatively mechanically ventilated space (Zone A)

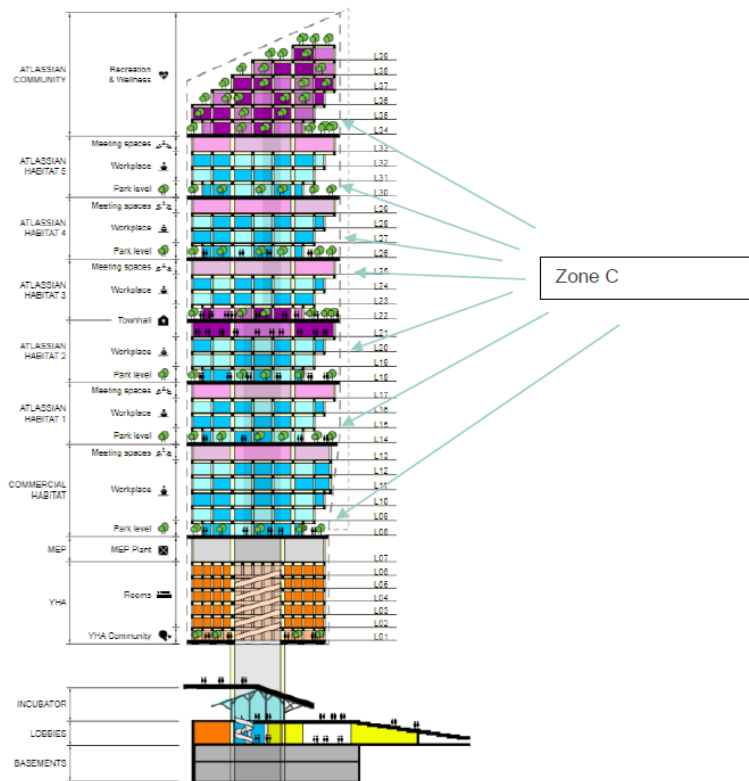


Figure 12. Existing wind conditions compared to results around cumulative wind assessment with Bocks A and B



Figure 13. Artist's impression of proposed wintergarden atrium spaces in Block A

Unfortunately, the need to design these spaces as wintergardens to mitigate wind impacts results in them technically qualify as gross floor area under the current LEP definitions, which was unforeseen previously and not taken into account when originally drafting the Western Gateway Rezoning Proposal. Only through the design competition process held in December 2019 (following public exhibition of the Western Gateway Rezoning Proposal) did this matter become apparent.

Given the integral nature of these spaces to the design philosophy and sustainability strategy for Block A, TfNSW together with the proponents has given further consideration on how best to support and facilitate the achievement of this outcome. This has led to the conclusion that there the two most feasible approaches are to either:

- **Option 1** - Increase the total maximum permissible gross floor area for Block A from 70,000 sqm to 77,000 sqm.
- **Option 2** - Include a new site-specific incentive clause for innovative naturally ventilated spaces across the sub-precinct.

We discuss each of these options in further detail below.

### **Option 1 – Increase the maximum permissible GFA**

Under this option the maximum gross floor area for Block A would be increased from 70,000 sqm to 77,000 sqm. This approach would enable inclusion of the wintergarden areas whilst still setting a clear maximum GFA that could be achieved within Block A. The benefit of this approach is that it will require less amendments to the Sydney LEP 2012, and would be clear in its intent to specifically facilitate the identified need for Block A.

The potential challenge with this approach is the need to be able to differentiate between standard GFA and the area required for wintergardens (i.e. the additional 7,000 sqm). Without this there would be the possibility that the additional gross floor area could be used as standard commercial GFA, which is its intended purpose. To address this some form of site-specific clause or inclusion of a guideline within the Western Gateway Design Guide would be needed to preserve and secure that component of the GFA for its intended wintergarden use. Provide this can be done, Option 1 would represent the least complex approach to facilitation the desired outcome for Block A.

This approach would also mean that the solution would be specifically tailored to respond to Block A's identified need, and would have no effect on the outcome as currently envisaged for Block B.

### **Option 2 – New site-specific LEP clause**

Under this option a new site specific LEP clause and associated design guidelines would be drafted that work together to both incentivise and regulate the inclusion of naturally ventilated wintergarden spaces within any building within the sub-precinct. In doing so the controls would seek to facilitate the achievement of the sustainability objectives without unnecessarily penalising the buildings by eroding their available gross floor area. These new provisions would seek to allow for the exclusion of these wintergarden spaces from the calculation of the gross floor area, but only where strict requirements relating to their design, operation and function are met.

The drafting of this LEP clause may be similar to that of the existing Sydney LEP 2012 clause 4.5A, which is currently only applicable to residential uses. This new definition would apply to all future buildings within the sub-precinct, to incentivise exemplar sustainable development outcomes for all development within the Western Gateway sub-precinct.

The benefit of this approach is that it would facilitate a consistent approach across the entire Western Gateway sub-precinct, however the challenge is that it would require more significant and complicated amendments to the Sydney LEP 2012, which may be overly technical and unclear to the general public.

*Re-exhibition not required*

Importantly, Transport for NSW can confirm that even with the inclusion of the wintergarden spaces, the proposed building for Block A will remain within the maximum building envelopes as exhibited in the rezoning application and depicted in the Western Gateway Design Guide. Accordingly, the proposed inclusion of the wintergarden spaces should not necessitate re-exhibition of the draft planning controls as there are no changes to the planning envelope of the potential impacts on surrounding stakeholders and neighbouring properties.

It is also considered that without this flexibility, achieving the sustainability objectives for the sub-precinct will become more difficult, and should office space be reduced to facilitate these wintergarden spaces, this would be detrimental to the broader strategic land use and employment objectives to provide a critical mass of technology and innovation commercial office space.

Further discussion on this matter is provided in the response prepared by Urbis on behalf of the proponents for Block A (refer to **Appendix D**)

## **5.2.2 Statutory weight of the Western Gateway Design Guide**

A new site-specific clause is proposed to give the Western Gateway Design Guide statutory weight during the assessment process for any future DA for the proposal in the Western gateway sub-precinct. A site specific provision is proposed to be incorporated into Division 5 of the SLEP and could be drafted as follows:

*(1) The consent authority must not consent to development on land within the Western Gateway sub-precinct unless it is satisfied that the development is consistent with the Western Gateway Design Guide as may be amended or replaced from time to time by the Secretary.*

*(2) This clause prevails over any other provision of this Plan to the extent of any inconsistency.*

## 5.3 Amendments to the Western Gateway Design Guide

This Response to Submissions Report has been prepared by Transport for NSW to address the issues raised as a result of the public exhibition of the Western Gateway rezoning proposal and draft Design Guide. Transport for NSW has reviewed certain issues raised as part of submissions received and has updated the Design Guide to clarify matters addressed within submissions received.

The following amendments outlined within Table 4 are proposed to the Design Guide. Minor corrections to grammar and spelling are not included within this Table.

Table 4. Summary of amendments to Western Gateway Design Guide

Ref.	Section	Proposed amendment
1	1.6 – Relationship to other documents	<p>This section has been amended to provide clarity on the documents relationship to other documents, namely the Sydney DCP 2012. New guidelines have been inserted which lists the specific sections of the Sydney DCP 2012 which will no longer apply to future applications. This is to avoid unnecessary confusion in the assessment of future applications.</p> <p>Amendments to this section are as follows:</p> <p>Subclause (1) has been amended as follows:</p> <ul style="list-style-type: none"> <li>- The Design Guide sets out specific guidelines to inform future development within the Western Gateway sub-precinct. Development within the sub-precinct will need to have <del>regards to this Design guide as well</del> regard to the relevant provisions in the Sydney Local Environmental Plan 2012 (SLEP 2012), <a href="#">including a requirement for development to be consistent with this Design Guide</a>. <del>Subject to paragraphs (2) and (3), the</del> Sydney Development Control Plan 2012 is also applicable to development not identified as State Significant Development. <del>In the event of any inconsistency between this Design Guide and the SDCP 2012, this Design Guide prevails to the extent of the inconsistency.</del></li> </ul> <p>New subclause (2) has been added as follows:</p> <ul style="list-style-type: none"> <li>- <a href="#">(2) This design guideline replaces the provisions of the Sydney Development Control Plan 2012 to the extent that it relates to the same subject matter as a provision of the Sydney Development Control Plan 2012 applying to the Western Gateway sub-precinct; and</a></li> </ul> <p>New subclause (3) has been added as follows:</p> <ul style="list-style-type: none"> <li>- <a href="#">Without limiting paragraph (2), the following provisions of the Sydney Development Control Plan 2012 do not apply to development in the Western Gateway sub-precinct:</a> <ul style="list-style-type: none"> <li>• <a href="#">Section 2: Locality Statements</a></li> <li>• <a href="#">Section 3.1.2.2 Through site links</a></li> <li>• <a href="#">Section 3.1.3: Pedestrian underpasses and overpasses</a></li> <li>• <a href="#">Section 3.1.4: Public open space</a></li> <li>• <a href="#">Section 3.1.5: Public art</a></li> <li>• <a href="#">Section 3.1.6: Sites greater than 5,000sqm</a></li> <li>• <a href="#">Section 3.2.1.1 Sunlight to publicly accessible spaces</a></li> <li>• <a href="#">Section 3.2.1.2 Public views</a></li> <li>• <a href="#">Section 3.2.3: Active frontages</a></li> <li>• <a href="#">Section 3.2.6: Wind effects</a></li> </ul> </li> </ul>



Ref.	Section	Proposed amendment
		<ul style="list-style-type: none"> <li>• Section 3.3: Design excellence and competitive design process</li> <li>• Section 3.6: Ecologically sustainable development</li> <li>• Section 3.7.2: Drainage and stormwater management</li> <li>• Section 3.7.3: Stormwater quality</li> <li>• Section 3.7.5: Water re-use, recycling and harvesting</li> <li>• Section 3.9.1: Heritage impact statements</li> <li>• Section 3.9.5: Heritage items</li> <li>• Section 3.11.4: Vehicle parking</li> <li>• Section 3.11.5: Car parks under the public domain</li> <li>• Section 3.11.6: Service vehicle parking</li> <li>• Section 3.11.10: Vehicle access for developments greater than 1,000sqm GFA</li> <li>• Section 3.11.11: Vehicle access and footpaths</li> <li>• Section 3.11.13: Design and location of waste collection points and loading areas</li> <li>• Section 3.14: Waste</li> <li>• Section 5.1: Central Sydney</li> </ul>
<b>Purpose</b>		
2	2.1 – Desired Future Character	<p>The Desired Future Character has been updated to further emphasise the technology and innovation intent for the Western Gateway sub-precinct, including its links to the Camperdown Ultimo Collaboration Area. Furthermore, an additional point has also been added with regard to important role that retail and service based businesses will play in the sub-precinct. Amendments are described below:</p> <ul style="list-style-type: none"> <li>– (b) Form an <del>prominent gateway</del> <b>important sub-precinct</b> to the broader Central Precinct, including <del>the an major public</del> entrance to the planned future Over Station Development</li> <li>– (d) <b>Be a smart precinct supported by technology and innovation with spaces and an environment that supports knowledge-based businesses and tech start-ups, and which has strong links to the Camperdown Ultimo Collaboration Area and its users</b></li> <li>– (e) Incorporate other town centre uses such as retail and service-based businesses that are important to ensuring a well-functioning town centre environment that services the needs of its users</li> <li>– (f) Be an area of CBD scale built form characterised by architecturally designed buildings that exhibit design excellence and <del>which maximise sustainability</del> <b>demonstrate leadership in sustainable initiatives</b></li> <li>– (g) <del>Act</del> as a visual marker for Central Precinct and provide a high quality backdrop <b>that supports an appropriate environmental amenity</b> for Sydney's future third square comprising the Western Forecourt, and Railway Square <del>and Lee Street</del>.</li> <li>– (h) Be characterised by a built form that embraces and celebrates the area's historical significance and enables the retention and adaptive re-use of key heritage items</li> </ul>

Ref.	Section	Proposed amendment
		<ul style="list-style-type: none"><li>– (i) Deliver generous through site connections that facilitate safe, effective and efficient movement of pedestrians between Central Station, the sub-precinct and the surrounding areas</li><li>– (j) <del>Reform</del> <del>Re-imagine</del> Henry Deane Plaza as a convergence point for pedestrian flows from Central West to and through the sub-precinct and a high-quality urban environment.</li><li>– (k) Deliver a public domain <del>effectively negotiates the shifting ground plane from footpath level</del> access for people of all abilities that <del>Lee Street</del> to any potential future development above the rail yards</li><li>– (l) Provide a series of rich and meaningful public spaces that are activated, accessible, safe and which create opportunities for visitors and workers to converse, collaborate, transit and relax</li><li>– (m) Reduce the urban heat island effect through landscaping that provides shade, improves the precinct's micro-climate and <del>softens</del> enhances the urban environment.</li></ul>
3	Definitions	Definition for Central Walk West has been updated to:  <b>Central Walk West</b>  Central Walk West is the potential future western <del>portion</del> extension of Central Walk East, connecting to the west of the Central Station building.
		The following definition of Gross Building Area has been inserted.  <b>Gross Building Area</b>  The total enclosed and unenclosed area of the building at all building floor levels measured between the normal outside face of any enclosing walls, balustrades and supports that could be theoretically achieved within the defined planning envelope inclusive of any cantilever zone (as per Figures 3, 4, 5 and 6 of this Design Guide). The unit of measurement for building areas is the square metre.
		The following definition of Gross Floor Area has been inserted.  <b>Gross Floor Area</b>  As defined under the Sydney Local Environmental Plan 2012.
		Definition for public domain has been amended to:  <b>Public Domain</b>  Public Domain includes all land that is set aside for unrestricted public access, and used primarily for pedestrian movement, leisure, recreation and amenity purposes. The public domain within the Western Gateway is identified as the yellow shaded area in Figure 2.
3.1 – Place and destination		
4	3.1 – Place and destination	Introductory text amended to reflect the following: <ul style="list-style-type: none"><li>– The three main challenges for development within the sub-precinct are how to create activation in the public domain <del>public places</del> how to create suitably articulated and exciting architecture at the lower levels where they interface with the public domain and how to mitigate undesirable impacts of towers</li></ul>

Ref.	Section	Proposed amendment
<b>3.1.1 Public domain</b>		
5	3.1.1 Public domain – Objectives	<p>The objectives for public domain have been updated to reflect the following:</p> <ul style="list-style-type: none"> <li>– (a) Provide a high quality <del>open space</del> <b>public domain</b> that supports a functional and elegant solution to level changes across the site.</li> <li>– (b) Provide a contiguous, clear and direct pedestrian connection <del>that is open to the sky</del> linking Lee Street to the future Over Station Development.</li> <li>– (c) Ensure any future pedestrian connection to the Over Station Development is designed to achieve a minimum width that reflects its role as a key pedestrian link and <del>the primary</del> <b>one of the</b> western entrances to the future Over Station Development.</li> <li>– (d) Ensure that the design and width of the pedestrian connections through the sub-precinct are capable of comfortably accommodating the volumes of pedestrian flows <b>and desire lines</b>, anticipated under a future fully developed scenario for the Central Precinct</li> <li>– (e) Ensure that <del>open space and</del> public domain facilitates the effective future integration of the sub-precinct with the city and the adjacent sub-precincts</li> <li>– <b>(f) Ensure the public domain is comfortable to use for its intended purpose</b></li> </ul>
6	3.1.1 Public domain – Design guidance	<p>The design guidance for public domain has been updated to reflect the following:</p> <ul style="list-style-type: none"> <li>– (1) Public domain within the sub-precinct is to be provided in accordance with Figure 2: Public domain and pedestrian connections.</li> <li>– (2) Public domain within the sub-precinct is to will: <ul style="list-style-type: none"> <li>a. connect to the City <b>and</b> provide appropriate interfaces and links to adjacent sub-precincts within the Central Precinct</li> <li>b. deliver a precinct that <del>authentically</del> responds to its context and celebrates its heritage</li> <li>c. create a focus for the southern part of Central Sydney</li> <li>d. contribute to the creation of walkable neighbourhoods</li> <li>e. shape a great place that is vibrant, diverse, active, inclusive and has a high level of amenity and design excellence</li> </ul> </li> <li>– (3) <del>The existing Henry Deane Plaza will change in function from its current use as primarily a place of repose, to</del> <b>be primarily a place of movement</b>. Any changes to <del>Henry Deane the</del> Plaza will need to ensure that it continues to be an accessible multifunctional space, that can be used for repose, movement, gathering and meeting, with grades appropriate for the intended uses.</li> <li>– (4) The pedestrian connection from Lee Street to the Devonshire Street tunnel is to be maintained while Devonshire St tunnel <del>is to</del> <b>continues</b> its role as a public pedestrian thoroughfare.</li> <li>– (5) Development Applications should be accompanied by a public domain plan that demonstrates how the precinct has been designed to deliver a high quality, co-ordinated public domain <del>series of open spaces</del> that includes (where appropriate): <ul style="list-style-type: none"> <li>a. street trees and other vegetation</li> <li>b. paving and other hard surfaces</li> </ul> </li> </ul>

Ref.	Section	Proposed amendment
		<ul style="list-style-type: none"> <li>c. lighting, <del>including the use of LED</del></li> <li>d. seating</li> <li>e. bicycle parking spaces for share bikes and <del>casual</del> visitors</li> <li>f. <del>refuse</del> bins</li> <li>g. signage, including wayfinding signs</li> <li>h. public art</li> <li>i. <del>heritage interpretation.</del></li> </ul> <ul style="list-style-type: none"> <li>– (6) The public domain is to provide an elegant and functional solution to level changes across the site that support seamless, step free, accessible access, <del>suitable for people of all abilities</del>, connections and transitions from Lee Street to the Devonshire Street tunnel as well as the future over-station development within the broader Central Precinct.</li> </ul>
7	3.1.1 Public domain – Figure 2	Figure 2 relating to Open space, public domain and pedestrian connections has been amended so that the north-south pedestrian link connects back to Lee Street instead of connecting to the direct south. This amendment has been made to remove the potential conflict between the pedestrian link and the driveway entering into the Integrated Distribution Facility, and secondly to respond to the recommendations of the technical wind analysis.

### 3.1.2 – Building massing and envelope

8	3.1.2 Building massing and envelope – Objectives	<p>Additional objectives have been inserted for building massing and envelope, including:</p> <ul style="list-style-type: none"> <li>– (e) Building massing and envelopes should ensure that views to the Central Station Clock Tower against the sky are retained when viewed by pedestrians and vehicles as they enter Railway Square from Broadway (see Figure 6: Heritage Sightlines, Views and Vistas).</li> <li>– (f) Development is to support the provision of a wind environment for surrounding public domain that is appropriate for the intended purpose.</li> </ul>
9	3.1.2 Building massing and envelope – Design Guidance	<p>This design guidance has been amended to provide guidance on envelope efficiencies. Guideline 3.1.2 (2) has been amended to include a new guideline relating to building envelope efficiencies as follows:</p> <ul style="list-style-type: none"> <li>– (2) New buildings within Block A and Block B are to have a maximum 80% envelope efficiency (i.e. the final building design should not have a Gross Floor Area that exceeds 80% of the Gross Building Area that is able to be achieved within the envelope).</li> </ul> <hr/> <p>Design guidance 3.1.2 (3) has been amended to:</p> <ul style="list-style-type: none"> <li>– (3) The pedestrian connection to over station development <del>must</del> is to be open to the sky <del>for its extent</del>.</li> </ul> <hr/> <p>This design guidance has been amended to clarify the purpose and function of the roofed terrace pavilion.</p> <p>Guideline 3.1.2 (4) has been amended to:</p> <ul style="list-style-type: none"> <li>– (4) Despite Design Guidance 3.1.2 (2), a <del>temporary structure such as a canopy, roof or awning</del> roofed terrace pavilion may be provided</li> </ul>

Ref.	Section	Proposed amendment
		<p>above the east-west pedestrian connection between Block A and Block B until such time as the future over station development is operational. It must be designed as a permanent structure with a maximum height of RL30 and should be able to be modified or removed once the pedestrian connection to future over station development is operational.</p>
		<p>This design guidance has been amended to reflect the proposed roofed terrace pavilion.</p> <p>Section 3.1.2 (5) has been amended to:</p> <ul style="list-style-type: none"> <li>The temporary structure is to mitigate interim wind impacts on roofed terrace pavilion is to be a publicly accessible and programmable space, improving the overall security of the public domain through passive surveillance and activation whilst providing all weather protection and reducing the urban heat island effect. It be designed to be removable and is to be removed once the pedestrian connection to the future over station development is operational.</li> </ul>
		<p>This design guidance has been amended to reflect the proposed roofed terrace pavilion. Section 3.1.2 (6) has been amended to:</p> <ul style="list-style-type: none"> <li>The former Inwards Parcels Shed and roofed terrace pavilion and temporary built form structures may protrude within the ground level separation area between Block A and Block B, but only where those structures: <ul style="list-style-type: none"> <li>do not impact on views from the future east-west over station pedestrian connection to the tower of the Marcus Clarke Building, and</li> <li>do not unreasonably impede the free-flowing movement of pedestrians between the sub-precinct and the future over station development.</li> </ul> </li> </ul>
		<p>Design guidance 3.1.2 (8) has been deleted to ensure a 30 metre building separation between Block A and Block B:</p> <ul style="list-style-type: none"> <li>Despite Design Guidance 3.1.2 (6), the building separation between the towers on Block A and Block B may be reduced within the Building Separation zone to a minimum 24m as identified on <b>Figure 5: North-South Section</b>, but only where it can be demonstrated that: <ul style="list-style-type: none"> <li>design excellence will be achieved through a competitive design process to address the objectives of quality;</li> <li>no additional overshadowing of Prince Alfred Park occurs beyond the Solar Access Plane controls;</li> <li>pedestrian access and views to the Marcus Clarke Building from the future over station east-west pedestrian connection are retained;</li> <li>there will be no unacceptable wind impacts felt by pedestrians on the ground plane for the intended purpose;</li> <li>the intrusions into the Building Separation Zone mitigate the effects of building bulk through effective articulation and modulation of the façade design.</li> </ul> </li> </ul>



Ref.	Section	Proposed amendment
		<p>Design guidance 3.1.2 (8) has been amended to:</p> <ul style="list-style-type: none"> <li>– (8) Built form on Block A is to be in accordance with Figures 3, 4 and 5 relating to building separation and setback distances and is to: <ul style="list-style-type: none"> <li>a. have a tower building with an underside (excluding lift cores and structural columns) no lower than RL 40</li> <li>b. have a cantilevered building articulation zone along the western façade that has a maximum depth of 5.0m and an underside no lower than RL70</li> <li>c. have a cantilevered building component along the southern façade that has a maximum depth of 5.0m and an underside no lower than RL60.4</li> <li>d. <i>support the achievement of a wind environment on the ground plane and in affected public domain areas that is appropriate for its intended use</i></li> </ul> </li> </ul> <hr/> <p>Design guidance 3.1.2 (9) has been amended to:</p> <ul style="list-style-type: none"> <li>– (9) Built form on Block B is to be in accordance with Figures 3, 4 and 5 relating to building separation and setback distances and: <ul style="list-style-type: none"> <li>a. is to provide a <i>minimum 6m</i> tower setback above the podium street wall height along the Lee Street frontage.</li> <li>b. <i>a variation to the minimum setback of no greater than 3m will be considered where it can be demonstrated that:</i> <ul style="list-style-type: none"> <li>i. <i>the podium is set forward of the tower façade line,</i></li> <li>ii. <i>any future building on Block B is designed to visually read in the streetscape as a building of two parts, including a podium structure with a tower above,</i></li> <li>iii. <i>the wind environment on the ground plane and in affected public domain areas is appropriate for its intended use.</i></li> <li>iv. <i>effective articulation and modulation of the podium design is achieved.</i></li> </ul> </li> </ul> </li> </ul> <p><del>a. is to provide a tower setback above the podium street wall height along the Lee Street frontage adjacent to Railway Square that:</del></p> <ul style="list-style-type: none"> <li><del>i. ensures that the podium is set forward of the tower façade line,</del></li> <li><del>ii. ensures that any future building on Block B is designed to visually read in the streetscape as a building of two parts, including a more heavy set podium structure with a tower above,</del></li> <li><del>iii. supports the achievement of a wind environment on the ground plane that is appropriate for its intended use by pedestrians.</del></li> </ul> <p><del>b. a zero setback may be considered along Lee Street immediately adjacent to the Mecure Hotel where:</del></p> <ul style="list-style-type: none"> <li><del>i. there will be no unacceptable wind impacts felt by pedestrians on the ground plane for the intended purpose,</del></li> <li><del>ii. effective articulation and modulation of the podium design is achieved.</del></li> </ul>

Ref.	Section	Proposed amendment
		<p>c. the tower element above the podium on all other facades for Block B may have the same façade alignment as the podium but only where:</p> <p>i. it is demonstrated that the building design appropriately responds to its surrounding context, particularly nearby heritage items,</p> <p>ii. there are no detrimental microclimate and public domain impacts,</p> <p>iii. the façade design incorporates articulation or the like that effectively reduces the visual bulk and mass of the building</p>
10	3.1.2 Building massing and envelope – Figures	Figure 2 Open space, public domain and pedestrian connections has been updated to so the north-south link through Block B is diverted to Lee and not to bus layover site to the south
		Figure 3 Separation distances and setbacks has been updated to reflect the revised envelopes, in particular the 30 metre building separation between Block A and Block B and updated podium height for Block B.
		Figure 4: Separation distances and setbacks – Upper Level– above RL63.8, has been updated to reflect the revised envelopes, in particular the 30 metre building separation between Block A and Block B
		Figure 5: North-South Section - Separation distances and setbacks has been updated to reflect the revised envelopes, in particular the 30 metre building separation between Block A and Block B and updated podium height for Block B.

### 3.1.3 – Design excellence quality and character

11	3.1.3 – Design excellence – Design Guidance	<p>This section has been amended to clarify the competitive design process in line with submissions received.</p> <p>Section 3.1.3 has been updated to:</p> <ul style="list-style-type: none"> <li>– (1) All buildings <del>Each block</del> within the sub-precinct <del>are</del> is to be the subject of a competitive design process and undertaken in accordance with the applicable design excellence competition guidelines of the Government Architect NSW or the City of Sydney Competitive Design Policy (Policy).</li> <li>– (2) No additional floorspace or building height under Clause 6.21(7) of the Sydney LEP 2012 will be awarded for a building demonstrating design excellence. The maximum floorspace and building height for sites within the Western Gateway sub-precinct is to be in accordance with Clause [XX] of the Sydney LEP 2012.</li> <li>– (3) Where a competitive design process is undertaken in accordance with <del>City of Sydney Competitive Design Policy</del>, it is to be in accordance with the following design excellence strategy: <ul style="list-style-type: none"> <li>a. Undertake an invited architectural design competition involving no less than <del>four (4)</del> five (5) competitors from a range of emerging, emerged and established architectural practices, with no more than 50% of competitors from international practices.</li> <li>b. The Jury composition is to be in accordance with the Provision 3.2 Jury Composition of the Policy or a five (5) member jury in</li> </ul> </li> </ul>
----	---	---

Ref.	Section	Proposed amendment
		<p>accordance with Part 3.4 of the Draft Government's Architect's Design Excellence Competition Guidelines (dated May 2018).</p> <ul style="list-style-type: none"> <li>- <del>No additional floorspace under Clause 6.21(7)(b) of the Sydney LEP 2012 will be awarded for a building demonstrating design excellence. The maximum floorspace for sites within the Western Gateway sub-precinct is to be in accordance with Clause [XX] of the Sydney LEP 2012.</del></li> <li>- <del>Buildings must be constructed of durable and robust materials.</del></li> <li>- <del>Architectural detailing should provide a higher order of priority to the levels interfacing with the adjacent open space and , public domain and heritage items.</del></li> </ul>
<b>3.1.4 – Active Frontages</b>		
12	3.1.4 – Active Frontages – Design Guidance	<p>Design guidance 3.1.4 (1) has been amended to provide greater flexibility of locations for active ground frontages to respond to site constraints:</p> <ul style="list-style-type: none"> <li>- A minimum of 75% <del>of building frontages to the public domain should be activated</del> <del>building frontages along the public domain should be</del> <del>through the inclusion of</del> retail, commercial lobbies or other active uses. <del>For the purpose of this guideline public domain means the area shaded in yellow shown in Figure 2 Public domain and pedestrian connections, as well as Lee Street and the Western Forecourt.</del></li> </ul> <p>Design guidance 3.1.4 (3) has been amended to ensure a diverse range of uses are accommodated:</p> <ul style="list-style-type: none"> <li>- Fine grain <del>retail</del> tenancies <del>must</del> <del>should</del> be located along key pedestrian movement corridors <del>and should cater to a diverse range of businesses including retail, entertainment and food and drink.</del></li> </ul> <p>Design guidance 3.1.4 (6) has been amended to ensure a diverse range of uses are accommodated:</p> <ul style="list-style-type: none"> <li>- <del>(6) Where not constrained by flooding,</del> Building entrances are to be designed to be at the same level as the adjoining public domain.</li> </ul> <p>Design guidance 3.1.4 (10) has been added:</p> <ul style="list-style-type: none"> <li>- <del>Notwithstanding the above, achieving the minimum 75% active building frontage on Blocks which contain heritage items may not be achievable due to the existing heritage fabric or other constraints. In these circumstances, active frontages should be maximised as much as possible dependent on the heritage values of the building and respond positively to the objectives of this clause.</del></li> </ul>
<b>3.1.5 – Wind</b>		
13	3.1.5 - Wind – Design Guidance	<p>Objective (a) has been amended:</p> <ul style="list-style-type: none"> <li>- Development within the sub-precinct must ensure that the cumulative impact of development on the wind environment does not result in uncomfortable or unsafe wind conditions on <del>publicly accessible open space</del> <del>public domain</del> within and surrounding the development taking into consideration the intended primary purpose of that space</li> </ul>

Ref.	Section	Proposed amendment
		<p>Design guidance under 3.1.5 has been amended:</p> <ul style="list-style-type: none"> <li>– (1) All new developments must <b>be designed to</b> mitigate adverse wind effects and be designed to satisfy the relevant wind criteria <del>(refer City of Sydney Standards)</del> <b>for the intended uses of the public domain.</b></li> <li>– (4) Wind impacts from any development on <del>publicly accessible open space</del> <b>public domain</b> should not exceed the Wind Comfort Standard criteria for sitting, standing and walking <b>taking into consideration the intended use of the space.</b> The wind comfort standard is an hourly mean wind speed or gust equivalent mean wind speed, whichever is greater, for each wind direction of no more than 5% of all hours in the year. These standards are: <ul style="list-style-type: none"> <li>a. walking through the OSD connection and footpaths - 8 m/s</li> <li>b. standing at building entrances, bus stops - 6 m/s</li> <li>c. sitting in future public spaces - 4 m/s</li> </ul> </li> </ul>
<b>3.1.7 – Views and vistas</b>		
14	3.1.7 – Views and vistas– Design Guidance	<p>Design guidance 3.1.7 (3) has been deleted to ensure a 30 metre building separation between Block A and Block B:</p> <ul style="list-style-type: none"> <li>– <del>Despite Design Guidance 3.1.7 (2), the separation of the built form between Block A and B (above RL60.4) may be reduced to a minimum of 24m, provided the building separation is aligned to enable a view corridor along the future east west over station pedestrian connection through to the Marcus Clarke Tower Building</del></li> </ul> <p>Design guidance 3.1.7 (4) has been amended to:</p> <ul style="list-style-type: none"> <li>– The separation between Block A and Block B is to be open to the sky <del>with no built form projections of components to be located within this space that would interfere</del> <b>where possible with provided</b> view lines from the over station pedestrian connection through to the <b>tower of the Marcus Clarke Tower are not interrupted.</b></li> </ul> <p>Design guidance 3.1.7 (5) has been amended to reflect the proposed roofed terrace pavilion, as follows:</p> <ul style="list-style-type: none"> <li>– <del>Despite Design Guidance 3.1.7 (4), a temporary structure such as a canopy, roof or awning</del> <b>roofed terrace pavilion</b> may occur between Block A and Block B, provided it is designed <del>to be to the standards that would be expected for a permanent structure, but which is able to be removable and is removed once the pedestrian connection to the future over station development is operational.</del></li> </ul>
<b>3.2 People and community</b>		
<b>3.2.1 – Heritage</b>		
15	3.2.1 Heritage – Design Guidance	<p>An additional objective has been inserted into the Guideline, as follows:</p> <ul style="list-style-type: none"> <li>– <b>(b) Development should retain and re-use any assessed heritage significant features, specific spaces and fabric of significance.</b></li> </ul> <p>Additional design guidance has been inserted into the Guideline, as follows:</p> <ul style="list-style-type: none"> <li>– <b>(4) Buildings should be constructed of durable and robust materials.</b></li> </ul>

Ref.	Section	Proposed amendment
		<ul style="list-style-type: none"> <li>(5) Architectural detailing should provide a higher order of priority to the levels interfacing with the heritage items and adjacent public domain.</li> </ul>
<b>Mobility</b>		
<b>3.3.1 – Pedestrian and cycle network</b>		
16	3.3.1 Pedestrian and cycle network – Design Guidance	<p>Objectives have been amended as follows:</p> <ul style="list-style-type: none"> <li>(a) Development will result in a high quality, integrated, permeable and accessible pedestrian and cycle network that gives priority to <b>current and future</b> pedestrian and <del>future</del> cyclist movement.</li> <li>(b) <del>A primary</del> An east / west movement corridor will be provided between Blocks A and B, that is open to the sky and which provides <del>flexible</del> pedestrian connection <b>for people of all abilities</b> between Lee Street and the future Over Station Development.</li> </ul> <hr/> <p>Design guidance 3.3.1 (2) has been amended to:</p> <ul style="list-style-type: none"> <li>(2) A primary pedestrian link <del>will</del> <b>is to</b> be provided as a corridor to the <b>future</b> over station development. This link <del>will facilitate the movement of visitors and workers,</del> is to occur between Block A and B, and is to be aligned such that it provides the key view from the over station development pedestrian corridor to the Marcus Clarke Tower as shown in Figure 6: Heritage Sightlines, Views and Vistas</li> </ul> <hr/> <p>Design guidance 3.3.1 (3) has been amended to:</p> <ul style="list-style-type: none"> <li>(3) A <del>secondary</del> pedestrian link should be created linking north-south through the <del>site</del> <b>sub-precinct</b>. This link will facilitate the internal circulation of workers, visitors and pedestrians in comfort from the <b>Western Forecourt to Henry Deane Plaza</b> and the Devonshire Street Tunnel to buildings in Block A and from the north to buildings in Blocks A and B. <del>This link should also support future pedestrian connections beyond</del></li> </ul> <hr/> <p>Design guidance 3.3.1 (4) has been amended to:</p> <ul style="list-style-type: none"> <li>(4) Access for pedestrians to the sub-precinct should be direct and legible, with access points that are highly visible from main approaches including from Lee Street, the <del>future open space to the</del> <b>Western Forecourt</b> north of Block A, the future over station development and the over station development corridor.</li> </ul> <hr/> <p>Additional design guidance has been inserted into the Guideline, as follows:</p> <ul style="list-style-type: none"> <li>(5) <b>Pedestrian access through the precinct, particularly links from surrounding areas, should be designed to be at grade where possible.</b></li> <li>(6) <b>An upper level public domain area designed to approximately RL21 is also to be provided.</b></li> </ul> <hr/> <p>Design guidance 3.3.1 (8) has been amended to:</p>



Ref.	Section	Proposed amendment
		<ul style="list-style-type: none"> <li>– (8) Pedestrian connections from Lee Street to the Devonshire Street tunnel will be accessible, step free with no interrupting structures to enable future flexibility and ensure it is suitable for people of all abilities.</li> </ul>
		<p>Design guidance 3.3.1 (9) has been amended to:</p> <ul style="list-style-type: none"> <li>– (9) Pedestrian connections from Lee Street to the Over Station Development will be accessible, intuitive, easy to navigate with no interrupting structures to enable future flexibility and ensure it is suitable for people of all abilities.</li> </ul>
		<p>Design guidance 3.3.1 (11) has been amended to:</p> <ul style="list-style-type: none"> <li>– (11) Street pavements and material palettes will be consistent with the design objectives and key principles of relevant City of Sydney's - <del>Sydney Streets Code</del> - streets codes.</li> </ul>
		<p>Design guidance 3.3.1 (12) has been amended to:</p> <ul style="list-style-type: none"> <li>– (12) End of trip facilities of a sufficient scale and design, and must be provided in a location that is clearly visible and which supports adjacent to foyer entrances, with clear, direct and intuitive access to be provided for its users, including cycle parking for visitors and employees.</li> </ul>

### 3.3.2 – Building entrances

17	3.3.2 Building entrances – Design Guidance	<p>Design guidance 3.3.2 (1) has been amended to:</p> <ul style="list-style-type: none"> <li>- (1) Development of Block A will include an entrance and/ or is designed to enable a future entrance, at grade with and close to the entrance to Central Walk West.</li> </ul>
		<p>Design guidance 3.3.2 (2) has been amended to:</p> <ul style="list-style-type: none"> <li>- (2) Access for pedestrians to each building should be direct and legible, with access points to the precinct to be highly visible from main approaches including Lee Street, the future <del>open space to</del> western forecourt the north of Block A, the future over station development and the over station development corridor</li> </ul>

### 3.3.3 – Vehicular access and parking

18	3.3.3 – Vehicular access and parking – Design Guidance	<p>A new design guidance has been inserted, as follows:</p> <ul style="list-style-type: none"> <li>– (5) Provision should be made within the basement design for charging stations to service electric vehicles.</li> </ul>
		<p>Design guidance 3.3.3 (7) has been updated to ensure the closure of the temporary access from Lee Street to the basement. Guideline 3.3.3 (7) has been updated to:</p> <ul style="list-style-type: none"> <li>– (7) The final arrangement of site access should be provided as follows:</li> </ul>

Ref.	Section	Proposed amendment
		<p><i>a. Lee Street (south) site access is to be the primary vehicular access point for the Western Gateway sub-precinct,</i></p> <p><i>b. Lee Street (north) access is to be provided <del>as</del> until both Block A and C are provided with alternate options for basement entry and servicing. This access is to be closed permanently once alternate options for basement entry and servicing are provided.</i></p>
		<p>Design guidance 3.3.3 (8) has been updated to:</p> <ul style="list-style-type: none"> <li>(8) Development applications for redevelopment of any Block within the sub-precinct is to be accompanied by a traffic management plan that sets out: <ul style="list-style-type: none"> <li><i>a. proposed measures for managing the effective and safe movement of pedestrians around the site during the construction process,</i></li> <li><i>b. how traffic impacts on the surrounding road network will be managed during construction and once the development is operational.</i></li> </ul> </li> </ul>

## Sustainability - Sustainability and environmental performance

### 3.4.1 – Sustainability and environmental performance

19	3.4.1 Sustainability and environmental performance – Design Guidance	<p>Objective (e) has been amended, as follows:</p> <ul style="list-style-type: none"> <li>(e) Ensure development incorporates best practice sustainability and environmental performance measures and initiatives for individual development sites and the whole precinct that: <ul style="list-style-type: none"> <li><del>i. reduce energy consumption</del></li> <li><del>ii. reduce carbon emissions</del></li> <li>i. minimise greenhouse gas emissions</li> <li>ii. Demonstrate innovation in reducing greenhouse gas emissions through energy efficiency, renewable energy and other measures. <del>and greenhouse gas emissions abatement</del></li> <li>iii. reduce the urban heat island effect</li> <li>iv. achieve high levels of waste separation and diversion from landfill</li> <li>v. minimise consumption of mains potable water</li> <li>vi. improve air quality</li> <li><del>vi. improve absorption of carbon.</del></li> </ul> </li> </ul>
		<p>Design guidance 3.4.1 (1) has been amended in response to submissions, and now includes minimum standards as well as desired sustainability targets. In doing so, it is sought to achieve a balanced solution that guarantees the achievement of high-level sustainability outcome, but also makes it clear that the intent is to aim for best practice.</p> <p>Guideline 3.4.1 (1) has been amended to:</p>

Ref.	Section	Proposed amendment															
			<table><tr><th></th><th>Minimum Standard</th></tr><tr><td>NABERS Energy Rating for commercial uses</td><td>5.5 star <a href="#">with a Commitment Agreement</a></td></tr><tr><td>NABERS Energy Rating for hotel uses</td><td>4.5 star <a href="#">with a Commitment Agreement</a></td></tr><tr><td>NABERS Water Rating for commercial uses</td><td>4 star</td></tr><tr><td>NABERS Water Rating for hotel uses</td><td>4 star</td></tr><tr><td>Well Rating</td><td><del>Platinum</del> <a href="#">Silver</a> core and shell (with commitment agreement)</td></tr><tr><td>Green Star Design and As-Built Rating</td><td><a href="#">Target a 6 star Green Star Design and As-Built rating (version 1.2) but achieve a minimum 5 star Green Star Design and As Built rating (version 1.2)</a></td></tr></table>		Minimum Standard	NABERS Energy Rating for commercial uses	5.5 star <a href="#">with a Commitment Agreement</a>	NABERS Energy Rating for hotel uses	4.5 star <a href="#">with a Commitment Agreement</a>	NABERS Water Rating for commercial uses	4 star	NABERS Water Rating for hotel uses	4 star	Well Rating	<del>Platinum</del> <a href="#">Silver</a> core and shell (with commitment agreement)	Green Star Design and As-Built Rating	<a href="#">Target a 6 star Green Star Design and As-Built rating (version 1.2) but achieve a minimum 5 star Green Star Design and As Built rating (version 1.2)</a>
			Minimum Standard														
		NABERS Energy Rating for commercial uses	5.5 star <a href="#">with a Commitment Agreement</a>														
		NABERS Energy Rating for hotel uses	4.5 star <a href="#">with a Commitment Agreement</a>														
		NABERS Water Rating for commercial uses	4 star														
		NABERS Water Rating for hotel uses	4 star														
		Well Rating	<del>Platinum</del> <a href="#">Silver</a> core and shell (with commitment agreement)														
		Green Star Design and As-Built Rating	<a href="#">Target a 6 star Green Star Design and As-Built rating (version 1.2) but achieve a minimum 5 star Green Star Design and As Built rating (version 1.2)</a>														
		A new design guidance has been inserted to allow for alternative ESD strategies for development in the Western Gateway sub-precinct, as follows: <ul style="list-style-type: none"><li><a href="#">An alternate ESD Strategy(ies) may be accepted where the consent authority is satisfied it will deliver an outcome that is equal to or better than the minimum standards set out in 3.4.1(1).</a></li></ul>															
		Design guidance 3.4.1 (4) has been updated to: <ul style="list-style-type: none"><li>(4) All new buildings <del>should</del> <a href="#">are to</a> be designed to incorporate suitable self-shading elements to minimise undesirable <del>summer-afternoon</del> solar gain and improve the passive sustainability performance of buildings</li></ul>															
Design guidance 3.4.1 (5) has been updated to: <ul style="list-style-type: none"><li>(5) Development is encouraged to <del>incorporate</del> <a href="#">apply the principles of biophilia in design, such as incorporating</a> green walls and roofs.</li></ul>																	
<b>3.4.2 – Water management</b>																	
20	3.4.2 Water management - Objectives	Objective (c) has been updated, as follows: <ul style="list-style-type: none"><li>(c) Development encourages sustainable water use practices <a href="#">and reduces demand on mains potable water.</a></li></ul>															
21	3.4.2 Water management – Design guidance	Design guidance 3.4.2 (1) has been updated to: <ul style="list-style-type: none"><li>(1) All new development is to provide an Integrated Water Management Strategy that illustrates how buildings will be designed to maximise water efficiency. <del>This should consider</del> <a href="#">The strategy should:</a><ul style="list-style-type: none"><li><a href="#">Include provision of</a> dual plumbed water systems to enable utilisation of the recycled water network for <del>all</del> permitted non-potable uses <del>such as</del> <a href="#">which may include</a> flushing, irrigation, fire fighting and certain industrial purposes</li></ul></li></ul>															

Ref.	Section	Proposed amendment
		<ul style="list-style-type: none"> <li>b. Identify how rainwater and / or stormwater will be harvested and reused on site to maximise sustainable water reuse</li> <li>c. Consider how the development can contribute to a the potential future precinct scaled recycled water scheme.</li> <li>d. Identify opportunities for water sensitive urban design including green walls and roofs.</li> </ul>
		<p>A new design guidance has been inserted, as follows:</p> <ul style="list-style-type: none"> <li>– (2) Development should include measures that reduces the effects of stormwater pollution on receiving waterways.</li> </ul>

### 3.4.2 Waste management

22	3.4.2 Waste management - Objectives	<p>Objectives for waste management have been updated, as follows:</p> <ul style="list-style-type: none"> <li>– (a) Development must refer to the City of Sydney's Guidelines for Waste Management in New Developments</li> <li>– (b) Development is to include a waste management system that maximises resource recovery to: <ul style="list-style-type: none"> <li>a. Reduce the amount of construction and demolition waste going to landfill.</li> <li>b. Reduce amount of waste generated in the operation of a development from going to landfill and maximise resource recovery.</li> </ul> </li> </ul>
23	3.4.2 Waste management – Design guidance	<p>Design guidance 3.4.3 (2) has been updated to:</p> <ul style="list-style-type: none"> <li>- (2) The Waste and Recycling Management Plan must include the following with regards to the management of demolition and construction waste: <ul style="list-style-type: none"> <li>(h) Measures to reuse or recycle at least <del>80%</del> 90% of construction and demolition waste.</li> </ul> </li> </ul> <p>Design guidance 3.4.3 (3) has been updated to:</p> <ul style="list-style-type: none"> <li>– (3) The Waste and Recycling Management Plan must include the following with regard to the management of operational waste: <ul style="list-style-type: none"> <li>a. plans and drawings of the proposed development that show: <ul style="list-style-type: none"> <li>(i) the location and space allocated within buildings to the waste and recycling management systems;</li> <li>(ii) the nominated waste collection point/s for the site; and</li> <li>(iii) identify the path of access for users and collection vehicles.</li> </ul> </li> <li>b. details of the on-going management of the storage, separation and collection of waste and recycling, including responsibility for cleaning, transfer of bins between storage areas and collection points, maintenance of signage, and security of storage areas; and</li> <li>c. where appropriate to the nature of the development, a summary document for tenants and residents to inform them of waste and recycling management arrangements.</li> <li>d. Measures to reuse or recycle at least 80% of waste from industrial, commercial and residential operations.</li> </ul> </li> </ul>

Ref.	Section	Proposed amendment
		<p>Design guidance 3.4.3 (6) has been updated to:</p> <ul style="list-style-type: none"> <li>– (6) Development is to identify and consider building and or precinct-scale solutions <a href="#">including onsite separation of food waste</a></li> </ul>
		<p>Design guidance 3.4.3 (7) has been deleted:</p> <ul style="list-style-type: none"> <li>– <del>(7) Development is to refer to the City of Sydney's Guidelines for Waste Management Policy for Waste Minimisation in New Developments</del></li> </ul>

## 6 Conclusion

---

This Response to Submissions Report has been prepared by Transport for NSW to address the issues raised as a result of the public exhibition of the Central Precinct draft Western Gateway Rezoning Proposal. Transport for NSW has reviewed the issues raised as part of submissions received, and has updated the proposal where considered necessary to respond to the matters raised and provide additional clarity with regards to the proposed planning controls for the Western Gateway sub-precinct.

### 6.1 Next Steps

DPIE will now consider all submissions and community feedback as well as this Response to Submissions Report, and will finalise its assessment of the Western Gateway Rezoning Proposal. The DPIE will then prepare an Assessment Report in consultation with the City of Sydney Council. The Project Review Panel will also consider the Assessment Report to determine consistency with its recommendations.

Once the Assessment Report has been finalised, the Minister for Planning and Public Space will consider the Assessment Report, and any report from the Project Review Panel, to make a determination about the Western Gateway Rezoning Proposal. If approved, the proposed amendments planning controls are expected to be included into the Sydney LEP 2012, and subsequent development applications may be assessed by the relevant planning authority using the new planning controls.

Community members who have registered for updates on the Department's Central Precinct webpage will be kept up-to-date by email communications.



## 7 Response to submissions table

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
<b>Government Agencies</b>			
91 (ID: n/a)	City of Sydney	At a high level, the City of Sydney (City) supports the redevelopment of the land above and around Central Station rail yards with an approach that is people-focused, place-led and prioritises jobs growth. Sustainable Sydney 2030 projected that the airspace could be better used with a well-designed extension of central Sydney.  The strategic intent of the proposal is consistent with the City's draft Local Strategic Planning Statement (Planning Statement) and draft Central Sydney Planning Strategy. These strategic documents envisage significant jobs growth for the area supported by improved local pedestrian connections, high-quality public domain and Central Sydney's future third public square to be located at Haymarket near Central Station. The area is envisioned to have safe and walkable connections across the rail cutting and state-of-the-art buildings that set a new benchmark in environmental performance and design quality and protect sun access to Prince Alfred Park.	Noted.
		<b>Infrastructure</b>  Infrastructure required to support the proposal for the Western Gateway sub-precinct must be considered and determined prior to finalising the planning controls. This is consistent with the strategic directions in the District Plan and priorities and actions in the draft Planning Statement for aligning development and growth with supporting infrastructure.  The City strongly recommends that: <ul style="list-style-type: none"><li>a holistic consideration of both State and local infrastructure needs for the entire sub-precinct. This should include specific needs of highly skilled workers in innovative and knowledge-based sectors, current and future transit users and changing local community surrounding the sub-precinct;</li><li>provision of a definitive framework development contributions to ensure commitment for and timely delivery of infrastructure through the subsequent development approval processes.</li></ul>	Refer to Section 4.8 of the RtS Report
		<b>Strategic land uses in the sub-precinct</b>  The draft SEPP needs to ensure that future site-specific development proposals for Blocks A and B provide a strong emphasis on innovation and technology-based businesses. This is a critical aspect that needs to be addressed in the future strategic planning framework to achieve the shared vision for the Precinct and give effect to the productivity objectives and strategic directions under the District Plan, draft Planning Statement and other strategic documents. In particular, future site-specific development proposals for Blocks A and B should address the following: <ul style="list-style-type: none"><li>the role of the sub-precinct in the Camperdown-Ultimo Health and Education Precinct, consistent with the actions and recommendations of the Greater Sydney Commission's Camperdown-Ultimo Place Strategy.</li><li>the future and desired role of the sub-precinct in the tech start-up sector and ecosystem and how the development in Blocks A and B would be suitable for knowledge-based businesses and tech start-ups.</li><li>the retail needs and provision of other urban services, cultural and enterprise uses to attract and retain skilled workers and also cater to the needs of future and current transit users, visitors and surrounding local community. The provision should include well-designed fine grain spaces for a diverse range of shops, food and drinks, arts, cultural and entertainment businesses that operate both during the day and at night-time.</li></ul>	Refer to Section 4.1 of the RtS Report
		<b>Movement, access and public spaces</b>  The City supports the focus on public transport and walking to create a safe, well-connected and people-focused sub-precinct. The City recommends the changes to the Draft 'Western Gateway Design Guide' listed below to ensure that future site-specific development proposals for the sub-precinct prioritises pedestrian and cyclist access, comfort and safety. The suggested changes also ensure future development adequately addresses existing and future public spaces and movement corridors: <ul style="list-style-type: none"><li>Delineate useable public spaces from vestigial publicly accessible spaces as part of movement corridors. It should also ensure elements of the 'public domain' appear and feel public and have high-levels of amenity through design, siting and massing of buildings around them.</li><li>Ensure that an overarching transport strategy for the entire sub-precinct is provided to ensure a consistent approach in:</li><li>managing traffic impacts to surrounding street network</li><li>staging and managing pedestrian and vehicular access, particularly servicing, arrangements throughout the development process</li></ul>	Refer to Section 4.3 of the RtS Report

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		<ul style="list-style-type: none"> <li>providing appropriate car parking and vehicular and loading and servicing access arrangements, including:</li> <li>ensuring that temporary vehicular access and servicing arrangements prioritise pedestrian safety and future development of Central Walk West; and</li> <li>ensuring that vehicular access on Lee Street north (Upper Carriage Laneway) will be closed once the consolidated basement access via Lee Street south is delivered on Block B.</li> <li>providing a car parking strategy that ensures it is limited to service vehicles and mobility parking is provided for the entire sub-precinct.</li> <li>Prioritise cyclist and pedestrian access, comfort and safety and enable better ground plane activation by:</li> <li>ensuring that future movement corridors and links are primarily at-grade, particularly links to the future 'third square' and north-south link between Block A and C,</li> <li>ensuring that a prominent at-grade foyer entrance to Central Walk West is provided,</li> <li>prioritising connections from Central Station to surrounding areas,</li> <li>ensuring that future movement corridors and links are primarily at-grade, particularly links to the future 'third square' and a prominent at-grade foyer entrance to Central Walk West,</li> <li>ensuring that end of trip facilities are provided adjacent to foyer entrances.</li> </ul>	
		<p><b>Sustainability</b></p> <p>The future redevelopment of the Western Gateway sub-precinct must be a leading example for achieving net-zero emissions by 2050, which could be achieved through best practice sustainability and environmental performance measures and initiatives for individual development sites and at a precinct level. This is consistent with the District Plan and draft Planning Statement priorities that support firm commitments to reduce carbon emissions and managing energy, water and waste efficiently in precincts, including NSW Government projects. It is therefore recommended that the Draft 'Western Gateway Design Guide' be amended to ensure that</p> <ul style="list-style-type: none"> <li>New development in the sub-precinct is accompanied by an ESD Strategy that demonstrates how the following targets will be met or exceeded:</li> <li>6-star NABERS Energy Rating for commercial uses with a commitment agreement</li> <li>4.5-star NABERS Energy Rating for hotel uses with a commitment agreement</li> <li>4.5-star NABERS Water Rating for commercial uses</li> <li>4-star NABERS Water Rating for hotel uses</li> <li>Platinum core and shell WELL Rating (version 2) for commercial uses</li> <li>6-star Green Star Design and As-Built rating (version 1.2)</li> </ul> <ul style="list-style-type: none"> <li>New development in the sub-precinct:</li> <li>achieves net zero emissions by being highly efficient and using a minimum of 100% renewable electricity. This could be achieved by maximising on-site generation, purchasing renewable electricity generated off-site and purchasing gold class offsets for remaining energy,</li> <li>includes an Integrated Water Management Strategy that:</li> <li>incorporates rainwater and/or stormwater harvesting measures to maximise sustainable water reuse, including for irrigation for publicly accessible spaces;</li> <li>illustrates how buildings will reuse water for all permitted non-potable uses such as flushing, irrigation, firefighting and certain functional purposes;</li> <li>includes a precinct-scale recycled water scheme that can connect to future networks including but not limited to the George Street network;</li> <li>provides more efficient delivery of hot water through centrally plumbed hot water systems within buildings;</li> <li>incorporates, not just considers, water-sensitive urban design and green walls and roofs;</li> <li>incorporates appropriate waste reduction and recycling measures, including;</li> <li>providing 90% recovery of construction and demolition waste</li> <li>providing 90% recovery of waste from industrial, commercial operations and other uses.</li> </ul>	Refer to Section 4.6 of the RtS Report
		<p><b>Design Quality</b></p> <p>The City supports the provision of detailed design guidance through the draft 'Western Gateway Design Guide', which is proposed to be referenced in draft amendments to the Sydney LEP 2012. The City also supports the requirement for a competitive design process in accordance with the applicable guidelines of the Government Architect NSW or the City of Sydney Competitive Design Policy.</p> <p>The Draft 'Western Gateway Design Guide' should also be amended to provide stronger guidance on the following issues:</p>	<p>Please refer to:</p> <ul style="list-style-type: none"> <li>Section 4.4 of the RtS report regarding matters relating to built form, including building separation and setbacks</li> <li>Section 4.5 of the RtS report regarding matters relating to amenity, including overshadowing and wind impacts</li> </ul>

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		<ul style="list-style-type: none"> <li>ensuring protection of sun access on existing and future public spaces and places between 9am-3pm at mid-winter,</li> <li>applying 75-80% per cent envelope efficiencies to ensure that building massing and envelopes provide flexibility for articulation and other design features in subsequent detailed design stages,</li> <li>ensuring appropriate building separation distances and setbacks are provided to better address interface with surrounding heritage buildings and streets and public spaces, maintain view corridors and address wind issues. This includes:</li> <li>providing an absolute minimum 30 metre separation with no obstructing cantilevered elements between Blocks A and B. This is consistent with separation distances for a typical Sydney street and will ensure that the view corridor to Marcus Clarke building is maintained,</li> <li>providing a clear lane way that is open to the sky between Blocks A and C (former Parcels Post Office building),</li> <li>ensuring a minimum 3 metre setback above the podium along Lee Street to better address interface with Lee Street and Railway Square, and</li> <li>providing appropriate setbacks between tower elements and a podium in Block B to reduce bulk and scale.</li> </ul>	<ul style="list-style-type: none"> <li>Section 4.7 of the RtS report regarding matters relating to design quality, including building efficiencies.</li> </ul> <p>The laneway, known as 'the Link' as outlined within the Public Domain Strategy, remains open to the sky between Blocks A and C</p>
		<ul style="list-style-type: none"> <li>ensuring appropriate management of wind issues, including:</li> <li>building envelope design that does not generate public domain wind effects. Temporary structures such as canopy, awnings or roofs may also be utilised but are not considered sufficient to adequately mitigate wind impacts.</li> <li>Providing a wind map, which at a minimum, identifies critical points within and in all areas affected by the development. The wind map should also specify the:</li> <li>Criteria for standing to all building entrances,</li> <li>Criteria for walking for the entire sub-precinct and extending to the building facades on George Street and Eddy Avenue (North), George Street (West) and southern façade of the Mercure building (South),</li> <li>Criteria for sitting for the area bounded by the northern alignment of the future Central Walk West, Grand Concourse/upper plaza, and the heritage-listed sandstone wall along Pitt Street,</li> <li>Criteria for sitting for the area bounded by the western footpath along Lee Street, the Mercure building façade, eastern footpath to Broadway and the northern alignment of the future Central Walk West.</li> <li>maximising street and laneway activation both during the day and night by implementing an active building frontage requirement of 80 per cent. Active spaces should also be designed to address flooding issues and cater to a diverse range of businesses and uses, including smaller scale retail, entertainment, food and drink, entertainment and arts and cultural uses.</li> <li>ensuring new structures and development adequately responds to the heritage characteristics of the Precinct and surrounding areas. In particular, future development proposals on Blocks A and B must include a site-specific Conservation Management Plan that ensures:</li> <li>retention of three dimensional features of heritage buildings (i.e. the former Inwards Parcels Post Shed and for Parcels Post Office building);</li> <li>architectural detail of new elements reads as a contemporary structure; and</li> <li>the proportion and detailing of new development references and addresses heritage buildings through bulk, articulation, form and quality of materials used.</li> </ul>	<p>Noted. Wind Modelling assessments have been prepared in relation to both Block A and Block B, which has informed a wind comfort criterion map. Refer to Section 4.5.2 of the RtS Report for further details relating to pedestrian wind comfort and proposed building design mitigation measures.</p>
		<ul style="list-style-type: none"> <li>clarifying that in the event that a competitive design process is undertaken in accordance with the City's Competitive Design Policy, it is to:</li> <li>be an invited architectural design competition involving no less than five competitors (instead of four as indicated in the Draft 'Western Gateway Design Guide') from a range of emerging, emerged and established architectural practices with at least 50% local architects as the lead architect.</li> </ul>	<p>All complete design processes are to be completed in accordance with the applicable guidelines of the Government Architect NSW or the City of Sydney Competitive Design Policy.</p> <p>Please refer to Section 4.7.1 of the RtS Report.</p>

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
93 (ID: n/a)	Heritage NSW – Tim Smith OAM	<p><b>Western Gateway sub-precinct</b></p> <p>It is understood that the proposed Western Gateway sub-precinct comprises three allotments - Block A (Railway Square YHA Shed), Block B (Henry Deane office block, and Block C (Adina Apartment Hotel). The precinct contains the former Parcels Post Office building, the former Inwards Parcels Shed, and the portals to the Devonshire Street tunnel which are all included within the SHR listed boundary. The remainder of the sub-precinct is listed as an item of environmental heritage on the City of Sydney LEP 2012.</p> <p>The former Parcels Post Office building (Adina Apartment Hotel) built in 1910-13, is identified as being of high heritage significance. It was located, as was the Main Terminus building and Clocktower, to dominate its surroundings. There is a strong visual connection between both buildings, with uninterrupted view lines across the sloped western forecourt. This part of the Central Railway Station site is an iconic landmark in the southern end of the CBD.</p> <p>The former Inwards Parcel Shed (YHA Railway Square) was built in 1906. The building retains its original scale and form and is important for demonstrating the role of the Central Railway Station site, and NSW Railways generally, in the development of postal services in NSW.</p> <p>We note the proposed amendments to the planning controls for the Western Gateway sub-precinct will identify the development envelope of future buildings within this sub-precinct, including a commercial tower above the former Inwards Parcel Shed building. We further understand the development for the Western Gateway sub-precinct will be subject to the future detailed design, including the form, architectural detailing and materials.</p>	Please refer to Section 4.2.1 of the RtS Report in relation to responding to heritage.
		<p><b>Land Use Zone</b></p> <p>It is noted that the majority of the Western Gateway sub-precinct site is zoned as B8 Metropolitan Centre. A small portion of the sub-precinct along the northern edge of the site is zoned SP2 Infrastructure which prohibits its use as commercial or retail space. This area contains a part of the westwing/ platform one building and the Parcels Area. It is proposed to rezone the SP2 portion so that the entire sub-precinct is zoned B8.</p> <p>Whilst the re-zoning would allow the entirety of the site to be under the one zoning plan, it would also allow the new built envelope to cantilever over the westwing/ platform one building and the Parcels Area, extending it closer to the Main Terminus building. Detailed consideration should be given to the form of any approved building(s) in this sensitive environment so that they respect the heritage values and legibility of existing structures and seek to minimise penetrations and disruption of spaces and historic fabric.</p>	Please refer to Section 4.2.1 of the RtS Report in relation to responding to heritage.
		<p><b>Building Heights</b></p> <p>The proposal includes the amendment to height controls within Block A and B of the sub-precinct. The existing maximum building heights for Block A is 7.5m, and 33m for Block B. It s proposed to increase the maximum building height to RL 200.2 (Block A) and RL 205.8m (Block B). This represents a significant increase in the allowable height of development in this area. (It is noted that different measurement units have been used within the report to describe existing and proposed heights making it difficult to compare the difference).</p> <p>The proposed heights do not respond to the character of the area and will result in adverse visual impacts to the Central Railway Station site. They also do not relate to the predominant scale, density and grain of the existing built fabric. In addition, the proposed is not sympathetic to the predominant forms (Main Terminus Building, Clocktower and former Parcels Post Office Building) within the streetscape. There will also be significant impacts to the former Inwards Parcels shed and setting of the former Parcels Post Office building.</p> <p>Consideration should be given to reducing the maximum building height envelopes to reduce adverse visual impacts to the surrounding State and local heritage items.</p>	Please refer to Section 4.2.1 and Section 4.4.2 of the RtS Report in relation to responding to heritage and building heights.
		<p><b>Floor Space ratio</b></p> <p>The proposed amendments to the floor space ratio (FSR) will increase the maximum FSR from the current maximum 3:1 to 70,000m2 (Block A) and 155,000m2 (Block B). (Again, it is noted that different measurement units have been used within the report to describe existing and proposed FSR making it difficult to compare the difference).</p> <p>This represents a significant increase in FSR and does not respond to the existing bulk and scale of the surrounding area.</p>	Please refer to Section 4.4.2 of the RtS Report in relation to building heights and floor space ratio.
		<p><b>Special Character Area</b></p> <p>It is proposed to remove the sub-precinct from the special character areas map within the Sydney LEP 2012. The Railway Square/Central Station special character area consists of a collection of low-medium scale (3–7 storeys) heritage buildings and streetscapes, a series of varied open spaces and a mix of uses and activities. Principles of this area include:</p> <ul style="list-style-type: none"> <li>• Maintain a high level of daylight access to Railway Square and its associated open spaces by restricting building height</li> <li>• Maintain and enhance the visual prominence and landmark significance of the clock tower of Central Railway Station in the views and vistas from various points, particularly along Broadway and George Street, when approaching or departing the city</li> </ul>	<p>It is noted that the majority of the Western Gateway sub-precinct, including all of Block B is currently explicitly excluded from the Special Character Area listing. Nevertheless, the Block B HIS and supporting heritage guidelines give particular consideration to the principles for the special character area which have informed Block B's proposal.</p> <p>While a specific Conservation Management Plan will be prepared as part of Block A's DA package. This will respond to its site specific heritage context to ensure that the heritage values of the place and its individual</p>



Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		<ul style="list-style-type: none"> <li>New development is to maintain and enhance vistas to Central Railway station.</li> </ul> <p>The removal of the site from the Railway Square/Central Station Special Character Areas will allow any new development to bypass these principles.</p>	<p>elements are recognised and respected. This will be informed by the detailed policy included in the new Conservation Management Plan, which will provide guidance on the retention, conservation and interpretation of the significant aspects of the place.</p> <p>Furthermore, the Strategic Framework and Stage 2 of the SSP Study for the broader Central Precinct provides an opportunity to take a fresh look at Railway Square and Central Precinct in the context of a clear intent to unlock the precinct as Central Sydney's new southern extension. On this basis, it is Transport for NSW's preference not to adopt these principles in their current form, but rather incorporate their intent into the Strategic Framework for the Central Precinct in a number of locations.</p> <p>Please refer to Section 4.2.1 of the RtS Report in relation to responding to heritage.</p>
		<p><b>Collective heritage storytelling</b></p> <p>Whilst the Heritage Council appreciates that development in and around this sensitive precinct is part of the evolution of the modern city, opportunities to provide the best heritage outcomes in terms of sensitive placement, high-end design, materiality and form should be driving goals. Any new building elements should not be considered in isolation but look to enhance the setting and provide for uniform connected inspired public realm spaces (place making). These areas should be considered for high-end heritage interpretation outcomes that seek to inform the public of the unique heritage values of the broader precinct, from Aboriginal custodianship and traditional practices, to nineteenth and twentieth century urbanism and changes driven by the Industrial revolution.</p> <p>The cumulative impact of change, development density and erosion of the readability (legibility) of the heritage cultural landscape must be integral considerations in all planning decisions.</p>	<p>Noted.. Refer to Section 4.2.1 of the RtS Report</p>
64 (ID: n/a)	Environment, Energy and Science (EES) Group - Susan Harrison	<p>Thank you for your 1 November 2019 letter to the Environment, Energy and Science (EES) Group regarding the above.</p> <p>The EES Group has reviewed available biodiversity data for the sub-precinct and the surrounding area and notes:</p> <p>numerous recent records for the Grey-headed Flying-fox (<i>Pteropus poliocephalus</i>) - a vulnerable listed species under the Biodiversity Conservation Act 2016 all vegetation appears to be urban exotic or landscaped native.</p> <p>The EES group considers it unlikely the proposed amendments to planning controls for the Western Gateway sub-precinct SEPP will adversely impact the Grey-headed Flying-fox. It is noted, however, that buildings and other human made structures in the sub-precinct area may provide habitat for threatened and protected microbats. It is therefore recommended a microbat survey be undertaken to inform the planning controls for the sub-precinct area.</p>	<p>Noted. A microbat survey will be considered as part of the DA planning process for Blocks A and B. The Public Domain Strategy (refer to <b>Appendix B</b>) also establishes principles for the public domain, including for street trees and landscaping to be incorporated, where appropriate. This will increase potential habitat areas within the Western Gateway sub-precinct.</p>
<b>Non-government organisations</b>			
55 (ID: 68961)	YHA Australia - Robert Henke	<p>We have been retained by YHA Australia to review the Central Precinct Western Gateway Rezoning Proposal (the Rezoning Proposal) and if relevant write a letter of support. YHA will benefit the Western Gateway Sub-Precinct as it will attract young people in to Central Precinct and activate the sub-precinct during out of work hours, especially during the nights and on weekends.</p>	<p>Noted.</p>
		<p><b>B8 Metropolitan Centre Zoning</b></p> <p>B8 Metropolitan Centre Zoning is imperative to YHA's goal of providing short-term tourist and visitor accommodation in the Western Gateway Sub-Precinct. It supports the rezoning to specifically permit commercial premises and tourist and visitor accommodation on the entirety of the site, so as to increase flexibility of their provision. To operate a successful hostel, the surrounding precinct must be a mixed use hub that is activated 24 hours a day. Therefore, whilst commercial premises afford a range of development options, retail premises and food and drink premises are of particular importance to YHA, as they will activate the precinct during out-of-work hours and provide patrons with entertainment and recreational options in the precinct.</p>	<p>Noted.</p>
		<p><b>Hostels as Complementary Land uses to the Innovation and Technology Industry</b></p> <p>YHA supports the development of emerging industries such as technology and innovation in the Western Gateway Sub-Precinct. This is because YHA believe hostels are a highly complementary land use to technological businesses due to the dynamic nature of digital industries. It is commonplace that</p>	<p>Noted. Tourist and visitor accommodation is a permissible use under the proposed B8 Metropolitan Centre zone of the Sydney LEP 2012.</p>

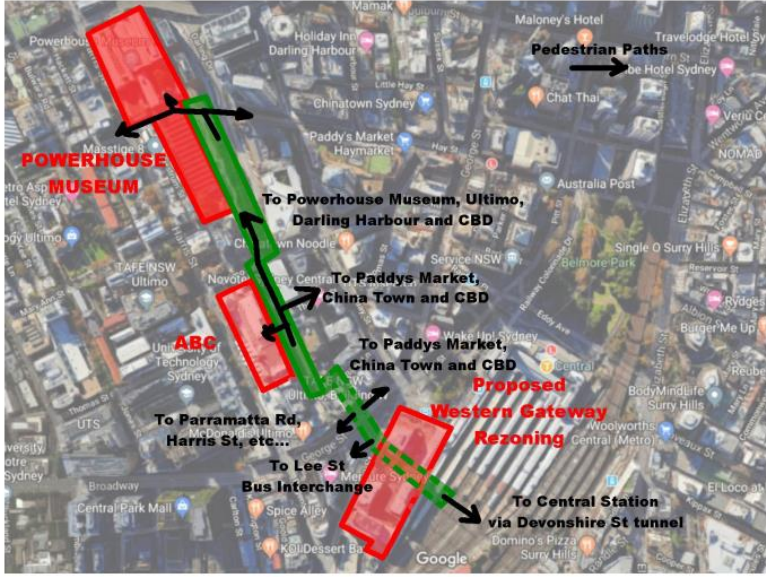


Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		technological workers are highly mobile, and innovative with work hours and environments, often having a mix of work and recreation. Therefore, there is demand for hostels offering short-term accommodation and unique working and living spaces. Therefore, a vision for a highly integrated technology and visitor accommodation precinct should be a key opportunity and focus for the Western Gateway Sub-Precinct.	Please refer to Section 4.1 of the RtS Report.
		<p><b>Pedestrian Access, Linkages and the Public Domain</b></p> <p>YHA supports the design guidelines that form part of the rezoning proposal. As hostels require a high quality precinct to attract young people, it is imperative that the subprecinct achieves high-quality built form, public domain, active frontages and land uses, site layout, solar access, views, sustainability, public art and seeks to improve the amenity of the sub-precinct and its surrounds.</p> <p>YHA supports the reconnection of the Central Precinct to its surrounds through multiple cross-corridor connections supporting both cycling and walking. Accordingly, statutory planning controls should allow for and ensure the smooth provision of these linkages and transition between public transport. The east-west link connecting Ultimo-Haymarket to Surry Hills should be a prime priority as tourists require a connected city with good pedestrian access to surrounding areas. A north-south linkage is also essential to provide efficient pedestrian access into the main CBD and related tourist attractions. YHA also supports the opportunities specific to the Western Gateway Sub-Precinct to deliver generous through-site connections and transform the Sub-Precinct into a convergence point for pedestrians and a high-quality urban environment.</p> <p>YHA also supports the vision to create a new public square at the Western Gateway Precinct, as it will attract more people to the sub-precinct and activate the surrounding area during all hours of the day. An activated civic space with substantial activity will entice people into the area. A new public square will reflect YHA's style of accommodation centred on shared spaces, and will give tourists a sense of being in a place everyone wants to be in. This in turn, will ensure that the Western Gateway Precinct becomes an around-the-clock hub that consistently meets the needs of and attracts tourists, visitors and workers to stay in the precinct.</p>	This is supported. Refer to Section 4.3 of the RtS Report
		The only caveat is that adequate provision must be kept in the precinct for inter and intrastate coaches.	The future of the Coach terminal will be considered as part of the broader State Significant Precinct (SSP) planning study for the Central Precinct. This will be undertaken during Stage 2 of the SSP planning process which will consider the transport network holistically including coach services.
		<p><b>Addressing Sydney's Shortage of Short Term Tourist Accommodation</b></p> <p>The Tourism Action Plan attached to the Sydney 2030 Plan, notes that Sydney has a shortage of short-term visitor accommodation.<sup>1</sup> This shortage has been exacerbated by the conversion of older hotels and hostels into residential apartments, as residential development is now seen as the highest and best use.</p> <p>As YHA is a not-for-profit organisation, its goal is to further the public interest and work for the good of the community, as opposed to necessarily achieving the highest and best use for a property. Therefore, YHA believes that the unique opportunity to increase Sydney's supply of short-term tourist accommodation must be harnessed through generous height and floorspace opportunities.</p> <p>Overall, YHA supports the Rezoning Proposal as the proposed controls reflect YHA's goals of developing a technology hub that is well-connected and activated, and aligns with the needs of future short term tourist and visitor accommodation to be situated in the Western Gateway Precinct.</p>	Noted. The proposed B8 Metropolitan Centre zoning permits a wide range of uses, including tourist and visitor accommodation.
73 (ID: 69091)	The National Trust - Graham Quint	<p>Comment on the Western Gateway sub-precinct</p> <p>The National Trust notes that this precinct "has the potential to be the first step in the creation of a new planning framework for Central Precinct" and will "kick start" the renewal. Setting the correct tone in this space is thus very important. The fact that this Government-owned land has existing long-term leaseholds subject to private sector redevelopment proposals means that pressure will exist to maximise development potential on this site. This is particularly worrying in terms of the effect that such proposals may have on the Parcels Post Office (State Listed) and Inwards Parcels Shed. The Trust expresses great concern at the character statement for this relatively constrained area that aligns with key streets in the city.</p> <p>The Draft Strategic Vision states that "The Western Gateway sub-precinct will be a gateway to Central Sydney, a visual marker for Central Precinct through city-scale buildings that creates a focal point for the innovation and technology hub." The aim to provide "critical mass of employment floor space" and "establish a visual marker" with accompanying photographs of the redeveloped London skyline is cause for concern in terms of the impact that development will have on the former Parcels Post Office, Inward Parcels Shed and Marcus Clarke Building. The Parcels Post Office building in particular sits on the axis with George Street and can be seen from a great distance away. To prioritise initial development on this site, rather than in the Rail Yards sub-precinct, would seem short-sighted, and any proposal for bulk and height in this area must have an impact on the heritage significance of the adjacent items.</p> <p>The Trust notes that in the Explanation of Intended Effect (p.4) that "the primary objective of the proposed amendment is to amend the existing planning controls that apply to the Western Gateway sub-precinct." Under the proposal, any redevelopment of the areas shown as Block A (the Inwards Parcels Shed) and Block C (the Parcels Post Office) must of necessity involve building over existing heritage items of public open space</p>	Noted. Please refer to Section 4.2.1 of the RtS Report for further detail regarding responding to existing heritage items such as the Inwards Parcels Shed located within Block A,



Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		The Trust notes that the proposal seeks to remove the Western Gateway sub-precinct area from the Special Character Areas Map in the Sydney LEP 2012. To remove the one part of the site that has two listed buildings, which faces Railway Square, sits on the axis of George Street and Broadway, frames the southern view of the Central Station Western Forecourt, and aligns with the entry point to both of the key cross corridor connectors to the precinct from the Special Character Areas Map is very disturbing. If anything, the Special Character Area should be amended to include Blocks A, B and C.	<p>It is noted that the majority of the Western Gateway sub-precinct, including all of Block B is currently explicitly excluded from the Special Character Area listing. Nevertheless, the Block B HIS and supporting heritage guidelines gives particular consideration to the principles for the special character area which have informed Block B's proposal.</p> <p>While a specific Conservation Management Plan will be prepared as part of Block A's DA package, this will respond to its site-specific heritage context to ensure that the heritage values of the place and its individual elements are recognised and respected. This will be informed by the detailed policy included in the new Conservation Management Plan, which will provide guidance on the retention, conservation and interpretation of the significant aspects of the place.</p> <p>It is also noted that the Strategic Framework and Stage 2 of the SSP Study for the broader Central Precinct provides an opportunity to take a fresh look at Railway Square and Central Precinct in the context of a clear intent to unlock the precinct as Central Sydney's new southern extension. On this basis, it is Transport for NSW's preference not to adopt these principles in their current form, but rather incorporate their intent into the Strategic Framework for the Central Precinct in a number of locations.</p> <p>Please refer to Section 4.2.1 of the RtS Report in relation to responding to heritage.</p>
		The Trust notes the 192.7m increase in maximum building height for Block A to 200.2m, and 170.8m height increase for Block C to 205.8m. Such increases are totally out of context with the surrounding area and the precinct itself, when the Central Station Clocktower is 75m tall and even the nearby UTS tower is only 120m in height. No amount of design guidelines, setbacks or urban design provisions can negate such height. There are only nine towers over 200m in height in Sydney, and certainly none of these are located in this area. Such scale is seemingly 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.	Please refer to Section 4.2.1 of the RtS Report
		<p>The Trust notes section 3.2.1 Heritage of the Draft Design Guide has the following objective:</p> <p>"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."</p> <p>The Trust does not accept that maintaining 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" is a good example of maintaining and celebrating the heritage significance of this item.</p>	Please refer to Section 4.2.1 of the RtS Report
		It is questioned why all of the documents on public exhibition continually refer to the proposals for Block A and Block B, but do not include information regarding Block C (the Parcels Post Building). For example, there is no design guidance for heritage (section 3.2.1) or building massing and envelope (section 3.1.2) for this item.	Block C does not form part of this rezoning proposal, as the proposal is not resolved enough at this stage. Design guidance on specific heritage matter relating to Block C would be proposed as part of a separate rezoning proposal.
		The National Trust expects that the heritage of the Central Precinct should form a key aspect of any redevelopment, and applauds the stated aims of the renewal in this regard which would see Sydney Central remain as one of the great historic railway stations of the world. The Trust is concerned by the apparent disregard for the stated aims of celebrating the significance of the place at the very first hurdle as far as the Western Gateway is concerned.	<p>It is considered that the Western Gateway Design Guide, Public Domain Strategy and supporting heritage documentation seeks to ensure the celebration of the historic railway.</p> <p>Please refer to Section 4.2.1 and Section 4.2.2 of the RtS Report.</p>

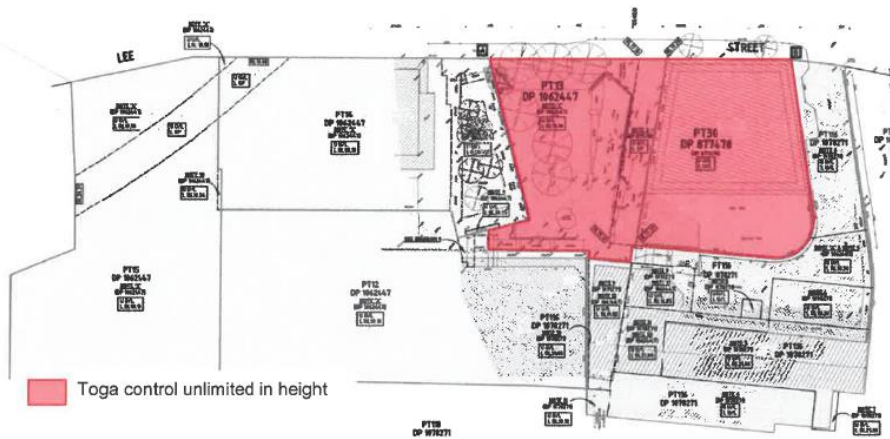
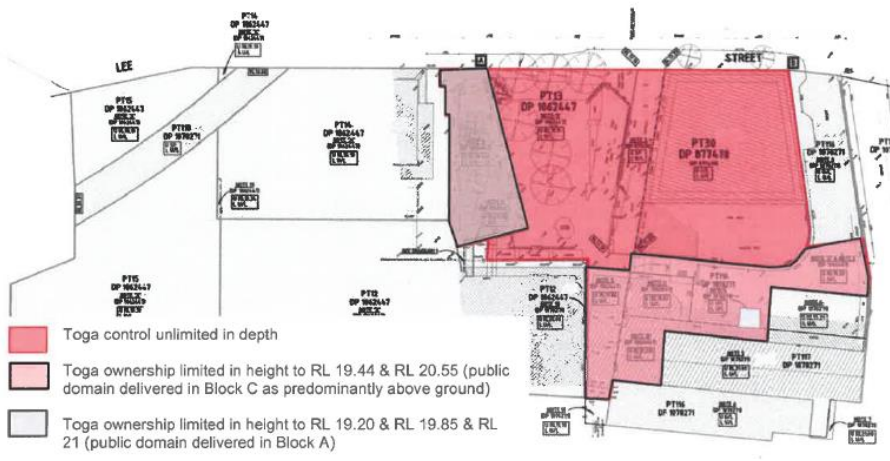
Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments						
75 (ID: 69101)	Save the Powerhouse Campaign	<p>SAVE THE POWERHOUSE is a community campaign aiming to prevent the sale of Ultimo's Powerhouse Museum to private developers.</p> <p>-1- Amendment to Sydney LEP 2012 The NSW Government proposes to rezone a block of land along Lee St, increasing maximum Building Height and Floor Space Ratio and removing Heritage Provisions constraints.</p> <p>The block's approximate dimensions are 210mX80m (16,500m2). It is currently occupied by</p> <p>- the former Parcels Post Office (now Adina Hotel): a heritage listed (Item I855) majestic sandstone and red brick building (north side)</p> <table><tr><td>Haymarket</td><td>Former Parcels Post Office including retaining wall, early lamp post and building interior</td><td>2 Lee Street</td><td>Lot 30, DP 877478</td><td>Local</td><td>I855*</td></tr></table> <p>- three modern office buildings currently occupied by various government departments (south side)</p> <div></div> <p>In the current circumstances this application seems to be nothing but an attempt to demolish a heritage building and 3 recent, perfectly useable, office blocks in order to replace them with taller and denser buildings. We oppose the application.</p>	Haymarket	Former Parcels Post Office including retaining wall, early lamp post and building interior	2 Lee Street	Lot 30, DP 877478	Local	I855*	The planning proposal does not seek to demolish existing heritage buildings, nor does it propose to amend the current listing of local and State heritage items within the Western Gateway sub-precinct.
		Haymarket	Former Parcels Post Office including retaining wall, early lamp post and building interior	2 Lee Street	Lot 30, DP 877478	Local	I855*		
<p><b>Goods Line and Devonshire Street tunnel</b></p> <p>The proposed sub-precinct is crossed by a pedestrian laneway (partly underground and partly above ground) linking the Devonshire Street tunnel with the Goods Line. This is an important access route for the numerous people who travel by train to visit the Powerhouse Museum.</p> <p>More generally the Goods Line/Devonshire Street pedestrian walkway is a vital link between Central Station and Ultimo, Chinatown, Darling Harbour and the CBD, as shown below.</p>	Pedestrian connections from Devonshire Street Tunnel to the Goods line will be maintained and enhanced by the upgrade of the public domain within the sub-precinct.								

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		 <p><b>We could not find any mention of intent to maintain this essential, well-used link in the application, and therefore oppose it.</b></p>	
77 (ID: 69106)	University of Technology Sydney (UTS) - Kara Krason	<p>This submission is made by the University of Technology Sydney (UTS) in relation to the Central State Significant Precinct (SSP) Draft Strategic Vision and Western Gateway rezoning proposal. 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 these important documents.</p> <p>UTS is one of the most significant stakeholders in the Sydney Innovation and Technology precinct and the Camperdown-Ultimo Collaboration Area, and has had ongoing input into strategic planning for this important precinct. Most recently, UTS sat on the Sydney Innovation and Technology Precinct Panel, which made key recommendations that shaped the development of the Strategic Vision and Western Gateway rezoning proposal. UTS looks forward to continued involvement in the precinct as it develops further.</p>	Noted.
		<p>UTS supports the overall concept of the Western Gateway, particularly in terms of the provision of significant commercial floor space and capacity for technology companies and start-ups. Although the site is proposed to be zoned B8 Metropolitan Centre, the proposed mix of land uses should be enshrined in any future planning controls for the precinct to ensure the primacy of employment uses and to restrict residential land uses. The objectives and land uses for a B8 zone can be broad and could potentially permit residential development within the Western Gateway, which UTS would have concerns with. Accordingly, we request that the drafting of the controls be specific enough to ensure that there is reasonable certainty that the vision for the Western Gateway focuses on it being delivered as an employment land precinct.</p>	The Western Gateway Design Guide has been amended to further emphasise employment, technology and innovation uses. Please refer to Section 4.1.1 of the RtS Report.
		<p>The proposed public domain initiatives are strongly supported. In particular, the provision of an east-west pedestrian link that will connect to the future OSD pedestrian connection to Surry Hills is supported.</p>	Noted.
		<p>As noted in commentary on the Strategic Vision above, the current proposal for the Western Gateway stops at the Lee Street Tunnel and does not include any improvements to pedestrian linkages beyond the SSP boundary. Specifically, the SEPP Amendment Report notes that “the pattern and points of access to the Western Gateway will remain largely unchanged in that pedestrians will continue to access from the east and west through Devonshire and Lee Street Tunnels”. The report also notes exploration of “opportunities to reintegrate (the Goods Line) into movement networks”. These statements indicate that the Western Gateway proposal does not contemplate any improvements to movement networks outside the sub precinct. UTS does not support this approach. The significant increase in floor space in the Western Gateway and the broader precinct and the provision of a vastly expanded and improved east-west connection 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 part of the Western Gateway rezoning proposal and should be delivered as part of development of the precinct.</p>	The Central Precinct SSP Strategic Framework identifies priorities and opportunities to enhance connections and movement within the Western Gateway sub-precinct and the broader Central Precinct. Further technical studies will be undertaken as part of Stage 2 of the SSP Study for the Central Precinct to investigate and identify opportunities for improved pedestrian and cycle connections and appropriate provisions to ensure easy access is maintained for all, including people with specific mobility requirements, and end of trip facilities are provided as part of any future development. This will include potential opportunities to improve pedestrian movements outside of the Central Precinct.

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		The Western Gateway Design Guide currently only requires the future design of the Western Gateway blocks to “support future pedestrian connections beyond the sub-precinct”. The ‘Open space, public domain and pedestrian connections’ diagram at Figure 2 in the Design Guide also indicates that while east-west and north-south pedestrian connections will be facilitated within the Western Gateway sub-precinct, these connections will only connect to existing pedestrian networks beyond the sub-precinct. While long-term improvements to pedestrian connections across Broadway are contemplated in the SEPP Amendment Report and accompanying documentation, it is imperative these improvements be brought forward and committed to in the Western Gateway rezoning proposal. UTS objects to the current proposal to only provision for future connections and not actually facilitate and deliver such required connections. The Goods Line is one of the most used pedestrian streets within Sydney and it is critical that any redevelopment of the Western Gateway site satisfactorily address improved linkages and amenity. Additional analysis of anticipated pedestrian flows should be undertaken to inform any required improvements.	The Central Precinct SSP Strategic Framework identifies priorities and opportunities to enhance connections and movement within the Western Gateway sub-precinct and the broader Central Precinct. This will include an assessment of pedestrian movement flows within the Central Precinct and beyond. Prior to committing to any substantial improvements to pedestrian networks beyond the sub-precinct, there will need to be further analysis of the cumulative impact of both the Western Gateway Rezoning Proposal and the broader renewal of Central Precinct. As such, it is appropriate for this to be considered as part of Stage 2 of the SSP Study for the Central Precinct.
78 (ID:69116)	Property Council of Australia - William Power	<p>The Western Gateway Precinct provides the opportunity to better integrate a multifunctional space that can be used for repose, movement, gathering and meeting with key retail, commercial office and mixed sue development. There is the opportunity to be bold in this precinct, to create a precinct that complements Sydney's established CBD and makes a visual statement.</p> <p>There is no better precinct in Sydney currently where established transport infrastructure, heavy and light rail and bus, can support and ensure a successful precinct outcome. It is critical that local and state government works closely with the private sector to ensure a world class precinct is delivered.</p> <p>The Property Council fully supports the establishment of the Western Gateway as a visual marker for Central Precinct through the creation of city scale buildings that positively contributes to Sydney's skyline, character and public identity.</p> <p>The involvement to date of Atlassian, and the unsolicited proposal from Dexu and Frasers to redevelop the Henry Deane Plaza, demonstrate the promise of the precinct and the potential for high quality outcomes.</p>	Noted.
85 (ID: 69146)	Action for Public Transport NSW - Jim Donovan	<p>Action for Public Transport (NSW) is a transport advocacy group active in Sydney since 1974. We promote the interests of beneficiaries of public transport - both of passengers and the wider community. We make this submission on the Central Station Precinct Western Gateway Sub-Precinct plan dated October 2019.</p> <p>We are particularly concerned that the rezoning is evidently proposed to happen before the precinct plan has been finalised. How can one be certain that enough pedestrian capacity, for example, will be available unless and until the precinct plan is finalised in full detail?</p> <p>Generally, we are concerned to ensure that walkability is upheld throughout the planning process. Any development should allow for pedestrian movement through the precinct. By "allow for", there should be adequate capacity for all movement and the development should not cause walking distances to be needlessly long. This is a real issue in the area - at present, walking distances around Central generally and particularly around Railway Square are well into the hundreds of metres for many common trips. Many people are deterred by frequent long walks, especially those pushing babies or carrying luggage. No-one wants a long walk in hot or wet weather, especially on crowded paths with enough electric scooters etc. to constitute a real risk of accident. More detailed comments on walkability are in our simultaneous submission on the Central State Significant Precinct plan.</p> <p>We recommend that the proposed re-zoning should not happen until the precinct plan is finalised and approved.</p>	Whilst it is acknowledged that existing pedestrian conditions present challenges for many, the proposed Western Gateway Rezoning Proposal will not hinder the delivery of broader pedestrian connections for Central Precinct, but is in fact aimed at facilitating the improvement of existing connections and creation of new connections once the broader Precinct is redeveloped. The Public Domain Strategy and Western Gateway Design Guide prioritise pedestrian and cycle connectivity within the sub-precinct. Please refer to Section 4.3 of the RtS Report in relation to movement, access and public spaces.
88 (ID: n/a)	TOGA - Withheld	<p>Thank you for the opportunity to provide a submission on the Central Precinct Western Gateway Rezoning Proposal (the Rezoning Proposal) and the Draft Strategic Vision for the Central State Significant Precinct (the draft Strategic Vision).</p> <p>As you would be aware, the TOGA Group (TOGA) is the long-term Crown leaseholder of the Adina Hotel site and adjacent Henry Deane Plaza, identified within the Rezoning Proposal as 'Block C' of the Western Gateway precinct.</p> <p>Block C is the key to unlocking the future development potential of the Western Gateway Precinct at Central Station and the first phase of the Sydney Innovation and Technology Precinct. In addition to being visually prominent at the entry of the precinct, the site controlled by TOGA provides critical pedestrian access between Railway Square and Central Station via the Devonshire Street Tunnel. The site also enables access from Lee Street to the YHA Site and facilitates the comprehensive redevelopment of Block A.</p> <p>The land controlled by TOGA contributes significantly to the improved public domain and public benefits associated with the redevelopment of the Western Gateway Precinct, including improved access to the Devonshire Street Tunnel, revised Henry Deane Plaza publicly accessible space, and street level / lower ground level pedestrian connections.</p>	Noted.
		TOGA supports the rezoning proposal as the first logical step in the renewal of the Central State Significant Precinct. TOGA supports the proposed land zoning of the precinct, and the strategy to include site-specific height and maximum gross floor area (GFA) controls for the precinct within the Sydney Local Environmental Plan 2012 (SLEP 2012).	Noted.



Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		<p>Specifically, TOGA does not object to the overall maximum building height or maximum GFA proposed for the Western Gateway sub-precinct as they relate to Block A and Block B. We note that while no change is currently proposed to these controls for Block C, that this will be facilitated through a separate stage 2 rezoning process.</p> <p>TOGA does not object to the proposed imposition of Design Excellence criteria for new buildings within the precinct, as TOGA believes the success of the precinct is in part contingent on the achievement of high-quality architecture and public domain. TOGA recognises the rezoning proposal includes more stringent overshadowing controls as they relate to Prince Alfred Park at specified times of the year (in this case from 10:00am- 2:00pm, increased from 10:00am- 12:00pm).</p> <p>This submission however requests minor changes to the SLEP maps proposed for the sub-precinct as it relates to Block C, recognition of the accurate characteristics of Block C, and minor changes to the proposed Draft Design Guide as it is proposed to apply to the sub-precinct.</p>	
		<p><b>Accurate Representation of Block C</b></p> <p>The area of Block C is incorrectly drafted on the proposed SLEP 2012 Locality and Site Identification map. This draft map should be corrected to more accurately reflect the likely development outcome on the site, specifically relating to part Lot 14 below a certain RL which will be delivered by TOGA rather than the developer of Block B.</p> <p>We note that Block C predominantly includes the area of two long-term leases within the Western Gateway Precinct, which are outlined in red in Figure 1 and described as follows:</p> <ul style="list-style-type: none"> <li>• Lot 30 in Deposited Plan 880518 (Adina Apartment Hotel)</li> <li>• Lot 13 in Deposited Plan 1062447 (Henry Deane Plaza)</li> </ul> <p>Parts of the lots comprising Block C are limited in either height or depth. The general 'above-ground stratum' as shown in Figure 1 includes the Adina Hotel building and Henry Deane Plaza. The belowground stratum includes the Adina Hotel building plus additional areas below the YHA building and associated car park and vehicle access driveway, and below part of Block B at its northern boundary.</p> <p>The implication of the current draft SLEP 2012 map is that the maximum GFA permitted on Block B would include any below ground retail tenancy or GFA delivered within this part of Henry Deane Plaza on lot 14 delivered by TOGA. While this may be beneficial for Block C theoretically, practically this would need to be resolved such that it is clear the amount of maximum GFA available for each block aligns with the landowner most likely to deliver the development on that part of the site.</p>	<p>For the purposes of planning for the Western Gateway sub-precinct Block descriptions have been made based on above ground air rights as this is considered the most appropriate approach that reflect future development potential across the sub-precinct. The floor space area for Blocks A and B have been determined based on an analysis of their potential to accommodate additional floorspace.</p> <p>The same process would be used for Block C in the future should that land be subject to a separate future planning process for rezoning.</p> <p>It is acknowledged and understood that the implications of maximum GFA's for each block include any below ground floorspace.</p>

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		<p><b>Figure 1 – Lease Arrangements</b></p>  <p><b>Picture 1 – Above Ground Stratum</b></p> 	
		<p><b>Heritage values of Block C</b></p> <p>The Rezoning Proposal does not mention the local heritage status of the actual Former Parcels Post Building. The existing building on Block C is listed as an item of local significance under Schedule 5 of the SLEP 2012, 'Former Parcels Post Office including retaining wall, early lamp post and building interior', Item 855.</p>	Noted. The rezoning proposal does not propose to amend the Sydney LEP 2012 with regard to the current heritage listing of the 'Former Parcels Post Office including retaining wall, early lamp post and building interior', Item 855.
		<p>While we note that the site is also included within the Central Railway Station State heritage listing, Sydney Terminal and Central Railway Stations Group (SHR 01255), the building is not independently listed on the State Heritage Register. This is an important point to clarify. Within the Rezoning Proposal, as currently drafted, the heritage significance of the fabric of the Former Parcels Post Office building could be exaggerated, which could lead to unwarranted restrictions on potential future development opportunities for Block C.</p>	Noted.
		<p>We also note that the Draft Design Guide encourages the provision of an 'appropriate clearance and curtilage to existing heritage items, in particular the Former Inwards Parcel Shed and Former Parcels Post Office'. While we do not propose any specific amendment to this objective within the Draft Design Guide, we note that the building envelope for Block A allows for an appropriate vertical clearance height above the Former Inwards Parcel Shed that could be replicated for the site specific conditions of the Former Parcels Post Office building.</p>	Noted.
		<p><b>Public Domain Proposal</b></p> <p>The future expansion and upgrading of publicly accessible space within the sub-precinct presents a significant opportunity to improve the amenity of the precinct and support the significant pedestrian movements facilitated through the Sydney Metro platforms at Central Station. The Rezoning Proposal represents an opportunity to improve the existing gradient transitions between Lee Street and the Devonshire Street Tunnel, and from the future 'third public square' north of the site to the Devonshire Street Tunnel.</p>	Noted. Commitments made in relation to Henry Deane Plaza are limited to setting objectives and the intended purpose of the space, in relation to the broader sub-precinct public domain strategy. No detailed commitments have been made in relation to expansions, upgrades or alterations to the plaza at this stage.



Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		<p>Furthermore, the Rezoning Proposal can facilitate the first stage of the Central Station Over Station Development (OSD), being the creation of stairs and/or other forms of vertical circulation between Henry Deane Plaza and the future platform above the existing Central Station rail lines. This space is likely to form the major public entrance to the future OSD. In this manner, the success of the Central OSD is connected in part to the success of providing a transition in levels within the Western Gateway sub-precinct.</p> <p>We note for DPIE's attention however that Henry Deane Plaza is publicly accessible, privately owned land. This is recognised in section 2.9 of the SEPP Amendment Report, but throughout the remainder of the documents is repeatedly referred to incorrectly "as public open space," and the "public domain".</p> <p>While it is TOGA's intention to maintain Henry Deane Plaza as publicly accessible, it should be noted that any 'upgrade' or alteration to this space, or any proposal for the expansion of this plaza to the north or south at the current 'lower ground level', will be on land controlled by TOGA. As such, TOGA remains a significant stakeholder in the ultimate design and function of this plaza, and the proposed 'north-south link' through the Western Gateway sub-precinct. Any proposal relating to this publicly accessible space will be facilitated through redevelopment of Block C and cannot be assumed or controlled by the redevelopment of Block A or Block B.</p> <p>The future character of this space is also referred to as facilitating the convergence of pedestrians, and servicing multiple purposes including movement, meeting, and relaxation. Further, it needs to tackle gradients, and be a place for visitors with activity 24 hours a day. TOGA are excited by the opportunity to upgrade this space, however we flag that the DPIE's expectations regarding the role of this plaza may need to be managed such that the space is fit for purpose and doesn't try to be 'everything to everyone,' especially given its design constraints.</p>	<p>The Western Gateway Design Guide has been amended to note that reference to the public domain means Henry Deane Plaza, Lee Street, Railway Square and the Western Forecourt.</p> <p>Whilst it is acknowledged that Henry Deane Plaza is land controlled by TOGA, the plaza must be considered in the holistic public domain strategy prepared for the sub-precinct. Transport for NSW will consult with TOGA in relation to future of Henry Deane Plaza, to ensure the intended outcomes for the plaza can be suitably delivered.</p> <p>Supporting this RtS report is a Public Domain Strategy has been prepared to ensure a coordinated approach to delivering a high quality and activated public domain. The strategy includes a series of public domain design principles to guide the future design of the public domain, along with design direction on key publicly accessible spaces within the Western Gateway sub-precinct, including Henry Deane Plaza.</p>
		<p><b>Draft Design Guide</b></p> <p>TOGA supports the approach taken by TfNSW to include reference to a Draft Design Guide within the site specific SLEP 2012 provisions, rather than requiring each site to complete a site-specific DCP or Concept Plan development application. The provision of a Draft Design Guide allows the landowners and developers of each site to apply consistent design guidance and work towards a collective vision for the sub-precinct.</p> <p>We do however note the following specific comments regarding the Draft Design Guide:</p> <ul style="list-style-type: none"> <li>The Draft Design Guide defines public domain and open space differently, but then goes on to refer to Henry Deane Plaza as each of these categories of space interchangeably. This needs to be clarified to avoid confusion and understand the future character and expectations of this space.</li> </ul>	<p>Noted. The Western Gateway Design Guide has been amended to note that reference to the public domain means Henry Deane Plaza, Lee Street, Railway Square and the Western Forecourt.</p>
		<ul style="list-style-type: none"> <li>The Draft Design Guide suggests that future Competitive Design Processes completed for new buildings across the site should include a range of emerging, emerged, and established Architectural Practices (clause 3.1.3.(2)). We note that it is likely to be difficult to integrate emerging firms within a Competitive Design Process for such large-scale buildings. As such, we would recommend that the Competitive Design Processes 'encourage' or recommend the consideration of a diversity of Architectural and design practices to achieve the objectives of government.</li> </ul>	<p>All complete design processes are proposed to be completed in accordance with the applicable guidelines of the Government Architect NSW or the City of Sydney's Competitive Design Policy.</p> <p>Please refer to Section 4.7.1 of the RtS Report.</p>
		<ul style="list-style-type: none"> <li>We support the requirement for the tower on Block B to be set back from the podium except along Lee Street where there will be no unacceptable wind impacts felt by pedestrians on the ground plane for the intended purpose, and effective articulation and modulation of the podium design is achieved (clause 3.1.2.(9)).</li> </ul>	<p>Noted. Please refer to Section 4.4.3 of the RtS Report.</p>
		<ul style="list-style-type: none"> <li>We note that a collective wind model analysis is required across Block's A, B and C. TOGA has commissioned wind consultant RWDI who has completed analysis which highlights areas for collective collaboration around design solutions to ensure a quality public realm outcome.</li> </ul>	<p>Cumulative wind modelling analysis has been prepared by both proponents of Block A and Block B, however does not incorporate any modelling of new built form on Block C as this is unknown at this stage. Design solutions to mitigate wind impacts on the public realm will be explored and documented as part the competitive design process for both Block A and Block B.</p>
		<ul style="list-style-type: none"> <li>We support the proposed building setbacks, and separation distances achieved to adjacent buildings (minimum 12m to development on Block A) to mitigate concern regarding tower crowding within the Western Gateway Precinct. Such building separation is greater than those already approved within the City of Sydney for instance at the APDG Precinct at Circular Quay and South Barangaroo.</li> </ul>	<p>Noted.</p>

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
84 (ID: 69151)	Fraser's Property Australia and Dexu Funds Management Limited (The Consortium)- Nicola Gibson	<p><b>Competitive Design Process</b></p> <p>The Consortium supports the intention to include a provision in the planning instrument that would enable a developer to choose between undertaking a competitive design process in accordance with the City of Sydney's Competitive Design Policy or a process that has been agreed with the NSW Government Architect.</p> <p>However, the Consortium is concerned that section 3.1.3(2) of the Draft Design Guide states that in the event that the City's competitive design process is followed the competition is to be determined by a five member jury in accordance with the Draft Government Architect's Design Excellence Competition Guidelines. This is contrary to the jury membership requirements in the City's policy and also conflicts with the proposed provision in the planning instrument, as described in the EIE, which is limited to choosing between either the City's policy or a process agreed with the Government Architect and does not include any additional requirements.</p> <p>The Consortium considers that the wording around the design competition process needs to be clear and limited to an exclusive choice between the City of Sydney's Competitive Design Policy and a competitive design process approved by the NSW Government Architect.</p> <p>Another ambiguity in the rezoning documents relates to the Government Architect design competition option. In the Draft SEPP Report it refers to future development being undertaken in accordance with either the City's policy or the relevant NSW Government Architect competitive design policy at the time of the competition which contradicts other statements that this pathway would be a design excellence process approved by the NSW Government Architect.</p> <p><b>Recommendation</b></p> <p>The Consortium considers that the wording around the design competition process needs to be clear and limited to an exclusive choice between the City of Sydney's Competitive Design Policy and a competitive design process approved by the NSW Government Architect, described on p.5 of the EIE as follows:</p> <p><i>Future development will need to:</i></p> <ul style="list-style-type: none"> <li>• undertake a competitive design process in accordance with the City of Sydney's Competitive Design Policy; or</li> <li>• undertake a design excellence process that has been agreed with the NSW Government Architect.</li> </ul> <p>To avoid any ambiguity, clauses 3.1.3(1) and (2) of the Draft Design Guide should be deleted and replaced with the same wording as that above</p>	<p>This has been clarified within the Western Gateway Design Guide. Please refer to Section 4.7.1 of the RtS Report.</p>
		<p><b>Design Guide/DCP</b></p> <p>The Consortium is generally supportive of the Draft Design Guide which reflects the concerted efforts of the Consortium, TfNSW, the DRP and Atlassian. However, it is important that the Design Guide is given statutory weight otherwise there is a risk that realisation of the agreed urban design and public domain principles could be jeopardised. The status of the Draft Design Guide and its relationship with Sydney Development Control Plan 2012 (DCP 2012) needs to be clarified as follows:</p> <ul style="list-style-type: none"> <li>• (a) Statutory weight – The Draft Design Guide is intended to replace the need for a site specific DCP for the Western Gateway sub-precinct. It is understood from the EIE that a provision will be included in the proposed planning instrument disapplying the requirement for a Development Control Plan in Clause 7.20 of the Sydney LEP 2012 (p.6, EIE). While this is supported, the Design Guide needs to also be referenced in the proposed planning instrument to ensure that it is clear that it replaces the need for a site specific DCP and has statutory weight. An alternative may be that the Design Guide be given statutory weight through a Section 9.1 Ministerial Direction as an interim measure until such time as the City of Sydney updates its DCP and transfers the Design Guide controls in their entirety into a new or amended DCP.</li> <li>• (b) Relationship between Design Guide and Sydney DCP 2012 – Section 1.6 of the Draft Design Guide states that Sydney DCP 2012 applies to any development that is not State Significant Development and that the Design Guide would prevail in the event of an inconsistency with DCP 2012. Without the Design Guide being given statutory weight through the proposed planning instrument it is not clear how the Design Guide would have primacy over DCP 2012. As discussed in 2.2(a) above, it is therefore important that the Design Guide is referenced in the proposed planning instrument (or Section 9.1 Ministerial Direction).</li> <li>• (c) Design Guide and City of Sydney's Competitive Design Policy – Section 1.2 of the City's Competitive Design Policy requires that the competitive design process be undertaken in accordance with a design excellence strategy approved by the consent authority as part of an associated site specific DCP or concept stage development application (Stage 1 development application). In the absence of a site specific DCP or in the event that a Stage 1 DA is not proposed, it is not clear whether the Design Guide would meet this particular requirement of the City's competitive design process</li> </ul> <p><b>Recommendation</b></p> <p>The Consortium makes the following recommendations:</p> <ul style="list-style-type: none"> <li>• That the Design Guide be provided with statutory weight by being referenced in the proposed planning instrument (or Section 9.1 Ministerial Direction) and its prevalence over DCP 2012 made clear.</li> <li>• That the DPIE secure the City's agreement in writing that the Design Guide is construed to be a site specific DCP and consequently meets the requirements of section 1.2 of its Competitive Design Policy. Alternatively, a note or provision should be included in the planning instrument which</li> </ul>	<p>Noted. The Western Gateway Design Guide has been amended to clarify this matter.</p> <p>Refer to Section 5.1 of the RtS Report in relation to amendments to the Western Gateway Rezoning Proposal to give statutory weight the Western Gateway Design Guide.</p>

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		states that for the purposes of section 1.2 of the City of Sydney's Competitive Design Policy, a design excellence strategy is taken to be endorsed if it is part of the approved Design Guidelines for the Western Gateway Sub-precinct.	
		<p><b>Restriction on residential land use</b></p> <p>The Consortium is concerned that it is proposed to limit future development in the Western Gateway sub-precinct to non-residential uses only. The Consortium believes that the intention to prohibit residential development in the sub-precinct is contrary to many of the stated strategic objectives for this area. In particular, the Collaboration Area Camperdown – Ultimo Place Strategy states that workers and students in the Collaboration Area should have the opportunity to live close to where they work or study and that there is a need to prioritise housing with a direct connection or collaboration with key institutions. It also argues that there is a need to be innovative in the way we plan for more affordable housing for students, key and creative workers.</p> <p>The Consortium also believes that prohibiting residential development within the sub-precinct is fundamentally at odds with trends being witnessed globally in which tech companies are offering housing for employees who may otherwise be unable to afford to live close to the workplace. Housing is a critical issue for tech companies in terms of their ability to attract and retain talent.</p> <p>While the Consortium acknowledges that development in the Western Gateway sub-precinct should be focussed on meeting the floorspace needs of the emerging technology and innovation precinct, it also believes that the opportunity to provide co-living housing, student housing and other non-traditional residential housing models should not be precluded within the sub-precinct.</p> <p><b>Recommendation</b></p> <p>The Consortium recommends that residential development that offers clear synergies with future tech and creative industries should be permitted within the Western Gateway sub-precinct.</p>	<p>This is noted. While recognising the synergies between forms of accommodation types and innovation precincts, the Western Gateway sub-precinct represents the significant first stage in delivering the vision for the Tech Central that is intended to provide a substantial amount of new commercial floorspace that will catalyse the innovation and technology initiative in Central Sydney. It is also noted that the role of the Western Gateway sub-precinct being focused around supporting innovation and technology-based businesses was strongly supported by a number of submissions received on the rezoning proposal.</p> <p>Delivering supporting accommodation uses will be investigated as part of the SSP Study for the broader Central Precinct. This will explore opportunities to provide housing for employees, students, key and creative workers who may otherwise be unable to afford to live close to the technology and innovation precinct.</p> <p>Given the above, the proposed SEPP amendment to incentivise innovation and technology-based land uses will remain.</p> <p>Please refer to Section 4.1.1 of the RtS Report.</p>
		<p><b>Building setbacks</b></p> <p>Clause 3.1.2(6) of the Draft Design Guide requires a minimum 30m setback between the towers on Blocks A and B. Clause 3.1.2(7) enables a reduction in the setback to 24m where it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>design excellence will be achieved through a competitive design process to address the objectives of quality</li> <li>no additional overshadowing of Prince Alfred Park occurs beyond the Solar Access Plane controls</li> <li>pedestrian access and views to the Marcus Clarke Building from the future over station east-west pedestrian connection are retained</li> <li>there will be no unacceptable wind impacts felt by pedestrians on the ground plane for the intended purpose</li> <li>the intrusions into the Building Separation Zone mitigate the effects of building bulk through effective articulation and modulation of the façade design.</li> </ul> <p>The Consortium supports the opportunity to reduce the setback to 24m and considers that the objectives above can be readily met. It has engaged Ken Maher and Hassell to work with TfNSW and its design team to define the form and function of the future east-west link in a Central Precinct context and proposed treatment of the setback between the towers to ensure that all issues are appropriately addressed.</p> <p>The provisions in Clause 3.1.2(9)(b) and (c) of the Draft Design Guide set out building setback provisions along the Lee Street frontage adjacent to the Mercure Hotel as well as for the other tower element facades above the podium. The Consortium is supportive of these building setback controls which allow a zero boundary setback for tower elements above a podium on the Lee Street frontage adjacent to the Mercure Hotel and other Block B boundaries.</p> <p><b>Recommendation</b></p> <p>The Consortium reiterates its support for a 24m setback between the towers on Blocks A and B subject to demonstrating achievement of the objectives in clause 3.1.2(7)(a) to (e) of the Draft Design Guide.</p> <p>The Consortium also supports the setback controls in clause 3.1.2(9)(b) and (c) of the Draft Design Guide that allow a zero boundary setback for tower elements above the podium on the Lee St frontage adjacent to the Mercure Hotel and other Block B boundaries</p>	<p>Please refer to Section 4.4 of the RtS Report in relation to built form issues, including building separation distances and setbacks.</p>
		<p><b>Overshadowing</b></p> <p>Prince Alfred Park</p>	<p>Please refer to Section 4.5.1 of the RtS Report.</p>

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		<p>There is some minor confusion in the documentation regarding the timeframe for no additional overshadowing (NAO) of Prince Alfred Park. The Draft SEPP Report states that the current controls under SLEP 2012 will continue to apply (i.e. 12pm to 2pm) but later states that NAO will apply from 10am to 2pm. The EIE states that the NAO period will be extended to 10am to 2pm but also references other 'nearby parks' which are not nominated. The Consortium therefore seeks clarification on the proposed NAO controls that would apply to its site and which open spaces are proposed to be subject to the controls to enable it to continue to correctly test potential shadowing impacts.</p> <p>Henry Deane Plaza</p> <p>Clause 3.1.6(1) of the Draft Design Guide requires that development is to ensure that Henry Deane Plaza and other publicly accessible areas receive an appropriate solar amenity for their intended use. However, there is no guidance on what is meant by 'appropriate solar amenity' or how 'publicly accessible areas' would be determined. The Consortium requests that this provision is clarified given that there is the potential for a temporary structure to be provided between Blocks A and B to address wind conditions which may have shadow impacts. The wording in the Draft Design Guide should be reviewed to clarify what is meant by 'appropriate solar amenity' and the area affected.</p> <p><b>Recommendation</b></p> <p>Clarification is sought from the Department on the proposed timeframe for NAO controls for Prince Alfred Park and what other nearby parks would be impacted by this control.</p> <p>In relation to Henry Deane Plaza, the Consortium recommends that the wording in the Draft Design Guide be reviewed to clarify what is meant by 'appropriate solar amenity' and to specify the area affected by the provision.</p>	
		<p><b>Wind impacts</b></p> <p>Clause 3.1.5(1) of the Draft Design Guide requires that all new developments must be designed to satisfy the relevant wind criteria as specified in City of Sydney standards. However, the current City of Sydney standards are inconsistent with clause 3.1.5(4) relating to the Wind Comfort Standard criteria for sitting, standing and walking.</p> <p>It is considered that the requirements for wind set out in 3.1.5(2) to (4) adequately cover the relevant matters to be addressed in any wind assessment and compliance with these requirements will ensure an appropriate wind environment for any future development. Clause 3.1.5(1) is unnecessary and should be removed to avoid confusion.</p> <p><b>Recommendation</b></p> <p>It is recommended that clause 3.1.5(1) be removed as it is inconsistent with clause 3.1.5(4) and the other provisions in this clause provide adequate guidance on wind assessment and wind environment.</p>	Noted. This has been amended within the Western Gateway Design Guide. Please refer to Section 4.5.2 of the RtS Report in relation to wind impacts.
		<p><b>Development contributions</b></p> <p>The EIE indicates that Infrastructure to support the proposal will be determined through the planning process for the wider Central SSP, including consideration of the contributions framework and mechanisms to delivery infrastructure for the sub-precinct. The Department will continue to work with Council, agencies and infrastructure providers to enable the framework to be finalised. The Consortium requests the details of any proposed framework and mechanisms being investigated be disclosed prior to the SEPP being finalised and the Consortium (in consultation with TfNSW) be provided with an opportunity to provide meaningful feedback.</p> <p>By way of background, the Consortium is currently negotiating with the NSW Government as part of the Unsolicited Proposal (USP). The agreement currently being negotiated will see the Consortium making a significant contribution to the Western Gateway sub-precinct and playing a pivotal catalyst role in delivering the NSW Government's strategic planning outcomes for the Central Precinct. In particular, the redevelopment of Block B as proposed will:</p> <ul style="list-style-type: none"> <li>• deliver critical services infrastructure for deliveries, waste management, and utilities, not only supporting development within the Western Gateway but also facilitating the broader Central Station Renewal Program</li> <li>• help unlock the potential future OSD, enabling essential above and below ground integration</li> <li>• significantly improve pedestrian connectivity between Central Station, the Western Gateway and beyond</li> <li>• enable the rationalisation and improvement of the public domain, including Henry Deane Plaza.</li> </ul> <p>Planning and delivering a future proofed basement infrastructure as part of Block B Proposal will facilitate the future OSD. It will also optimise the use of the sites within and adjoining the sub-precinct and create better design outcomes by freeing up the ground plane for high value uses, including public spaces, activated facades and quality urban amenity.</p> <p>Along with these significant public benefits, the Consortium will also be contributing to local infrastructure through the payment of City of Sydney section 61 contributions and provision of public art.</p> <p>In light of the above, the Consortium considers that the levying of additional contributions on the development, over and above works being offered through the USP process and the payment of section 61 contributions is not required.</p> <p><b>Recommendation</b></p>	Please refer to Section 4.8 of the RtS Report in relation to infrastructure planning and contributions.



Submission No. / ID	Submitter	Issue Raised				Response / Proposed Amendments
		The Consortium requests the details of any proposed framework and mechanisms being investigated be disclosed prior to the SEPP being finalised and the Consortium (in consultation with TfNSW) be provided with an opportunity to provide meaningful feedback.				
		<p><b>Draft Amendment to SLEP 2012</b></p> <p>The draft planning instrument that will facilitate the redevelopment of the Western Gateway sub-precinct has not been included in the exhibition documents for the rezoning proposal. While the intent of the proposed planning instrument is discussed in the EIE, the actual wording of the controls has not been made available. Given the scale and complexity of the Block B redevelopment project, it is vital that the Consortium be provided with an opportunity to review the draft planning instrument and provide feedback before it is made.</p> <p><b>Recommendation</b></p> <p>The draft amendment to SLEP 2012 should be made available to the Consortium for review and comment and any feedback taken into account by the Department prior to it being made</p>				The draft planning instrument is yet to be drafted by the Office of Parliamentary Counsel, in accordance with recommendations by DPIE, to be determined based on this RtS Report. Therefore, Transport for NSW cannot provide any further specific information regarding the draft instrument at this stage.
		Reference	Issue	Provision	Consortium response	Noted. This has been clarified by insertion of new guidance within the Western Gateway Design Guide.
		Draft Design Guide – Section 1.6	Relationship to DCP	In the event of an inconsistency between the Design Guide and the SDCP 2012, the Design Guide prevails.	Without the Design Guide being given statutory weight through the proposed planning instrument it is not clear how the Design Guide would have primacy over DCP 2012. The Design Guide should be referenced in the proposed planning instrument (or Section 9.1 Ministerial Direction) and its prevalence over DCP 2012 made clear.	
		Draft Design Guide – Section 3.1.1(5)	Public domain plan	<p>DAs should be accompanied by a public domain plan that demonstrates how the precinct has been designed to deliver a high quality, co-ordinated public domain.</p> <p>The coordination of the design development of the public domain in the Western Gateway sub-precinct is the responsibility of Transport for NSW. The Consortium will ensure that any interfaces between its development and the public domain are integrated with both the existing and future public domain. To provide for a situation where the Consortium's design competition process and DA documentation may be ahead of planning for other areas of the public domain, it is suggested that section 3.1.1(5) of the Design Guide be amended along the lines of (new text bolded):</p> <p><i>Development Applications should be accompanied by a public domain plan that demonstrates how the precinct has been designed <b>or facilitates the delivery of a high quality, co-ordinated public domain that includes (where appropriate, and having regard to the publicly available information at the time):</b></i></p> <p><i>a. street trees and other vegetation</i></p> <p>etc</p>		<p>Supporting the RtS report is a Public Domain Strategy which has been prepared to ensure a coordinated approach to delivering a high quality and activated public domain. The strategy includes a series of public domain design principles to guide the future design of the public domain, along with design direction on key publicly accessible spaces within the Western Gateway sub-precinct. A detailed public domain plan would be required as part of any future DA on Block B to further detail the proposed function, programming, treatment and materiality of public domain elements within Block B.</p> <p>The proposed amendment to the wording of section 3.1.1(5) of the Design Guide is considered unnecessary.</p>
		Draft Design Guide Section 3.1.2(6) & (7)	Setback between Blocks A and B towers	A minimum 30m setback should be provided between the towers on Blocks A and B. However, a reduction in the setback to 24m may be considered subject meeting specified criteria.	The Consortium reiterates its support for a 24m setback between the towers on Blocks A and B subject to demonstrating achievement of the objectives in clause 3.1.2(7)(a) to (e) of the Draft Design Guide.	Please refer to Section 4.4.1 of the RtS Report.
		Draft Design Guide Section 3.1.2(9) (b) and (c)	Setback along Lee Street and other Block B tower facades	Zero setback may be considered along Lee St adjacent to Mercure hotel provided that there are no unacceptable wind impacts and effective articulation and modulation of podium is achieved.	The Consortium supports the setback controls in clause 3.1.2(9)(b) and (c) of the Draft Design Guide that allow a zero boundary setback for tower elements above the podium on the Lee St frontage adjacent to the Mercure Hotel and other Block B boundaries.	Please refer to Section 4.4.3 of the RtS Report.

Submission No. / ID	Submitter	Issue Raised				Response / Proposed Amendments
				<p>Tower element above the podium on all other facades for Block B may have the same façade alignment as the podium but only where:</p> <p>the building design appropriately responds to its surrounding context, particularly nearby heritage items,</p> <p>there are no detrimental public domain impacts,</p> <p>the façade design incorporates articulation or the like that effectively reduces the visual bulk and mass of the building</p>		
		Draft Design Guide – Section 3.1.3(1) & (2)	Competitive design process	<p>All buildings within the sub-precinct are to be subject of a competitive design process in accordance with the applicable guidelines of the Government Architect NSW or the City of Sydney Competitive Design Policy.</p> <p>In the event that a competitive design process is undertaken in accordance with the City's policy, it is to be determined by a five member jury in accordance with the Draft Government's Architect's Design Excellence Competition Guidelines.</p>	The Consortium considers that the wording around the design competition process needs to be clear and limited to an exclusive choice between the City of Sydney's Competitive Design Policy or a competitive design process approved by the NSW Government Architect. To avoid any ambiguity, clauses 3.1.3(1) and (2) of the Draft Design Guide should be deleted and replaced with the same wording as provided on page 5 of the Explanation of Intended Effect.	Please refer to Section 4.7.1 of the RtS Report.
		Draft Design Guide – Section 3.1.3(3)	Bonus provisions	No additional floorspace under Clause 6.21(7)(b) of the SLEP 2012 to be awarded for a building demonstrating design excellence.	As there are a number of bonus floorspace provisions under SLEP 2012, a clear statement should be provided about which bonuses may or may not be available.	<p>The following Sydney LEP 2012 provisions will be switched off, including:</p> <ul style="list-style-type: none"> <li>• Clause 6.5, 6.6, 6.7 and 6.8 – remove potential additional bonus floorspace being achieved on site.</li> <li>• Clause 6.10 – turn off heritage floorspace bonus.</li> <li>• Clause 6.21(7)(b) – turn off additional bonus floorspace for design excellence</li> </ul>
		Draft Design Guide Section 3.1.4(1)	Active frontages	A minimum of 75% of building frontages along the public domain should be activated.	The Consortium is able to achieve this requirement as it relates to the key public domain areas along Block B's northern boundary and Lee Street frontage. However, it is not appropriate for active frontages to be provided along its southern boundary as this is the interface with the service access to the integrated distribution facility.	The is supported, the Western Gateway Design Guide has been amended to reflect this approach.
		Draft Design Guide Section 3.1.5	Wind	All new developments must mitigate adverse wind effects and be designed to satisfy the City of Sydney wind criteria as well as other standards.	The requirements for wind set out in 3.1.5(2) to (4) adequately cover the relevant matters to be addressed in any wind assessment and compliance with these requirements will ensure an appropriate wind environment for any future development. Clause 3.1.5(1) is unnecessary and should be removed to avoid confusion.	Please refer to Section 4.5.2 of the RtS Report.
		Draft Design Guide	Solar access	Development is to ensure that Henry Deane Plaza and other	The Consortium is concerned that this provision is ambiguous and does not provide sufficient guidance of what would be an acceptable	Please refer to Section 4.5.1 of the RtS Report.



Submission No. / ID	Submitter	Issue Raised				Response / Proposed Amendments
		Section 3.1.6		publicly accessible areas receive an appropriate solar amenity for their intended use.	outcome. Given that there is the potential for a temporary structure to be provided between Blocks A and B to address wind conditions which may have shadow impacts, the wording in the Draft Design Guide should be reviewed to clarify what is meant by 'appropriate solar amenity' and the area affected.	
		Draft Design Guide Section 3.3.1(3)	North-south pedestrian link	Secondary pedestrian link should be created linking north-south through the site	The principle of the North South link as a secondary connection through the Western Gateway site is supported. Given the complex servicing arrangements that are proposed within the interface of Block B and the bus layover site (Design Guide Item 3.3.3 Vehicular Access and Parking) direct access to the bus layover site from Block B is problematic. It is proposed to direct the North South link towards Lee Street from Henry Deane Plaza and Block B to alleviate these issues and support the activation of the future pedestrianised Lee St. The Design Guide should be updated to ensure that there is flexibility to allow the final public domain design to respond to the above constraints and support pedestrian activation of Lee Street.	The is supported, the Western Gateway Design Guide has been amended to reflect this approach.
		Draft Design Guide Section 3.4.1(1)	Sustainability targets	Future development must demonstrate, amongst other matters, achievement of 5 star Green Star Design and As-Built rating	The Consortium has aspirational targets for sustainability which are not necessarily captured by the GBCA rating tool, and believe 5 Star Green Star is the appropriate minimum commitment as these initiatives are explored post-Design Competition.	Please refer to Section 4.6 of the RtS Report.
		EIE	Restriction on residential development	Greater building height and gross floor area controls will only be allowed for non-residential uses	The Consortium considers that residential development that offers clear synergies with future tech and creative industries should be permitted within the Western Gateway sub-precinct. This will also ensure a culturally balanced mixed-use precinct capable of sustaining a night-time economy.	<p>The Western Gateway sub-precinct represents the significant first stage in delivering the vision for the Tech Central that is intended to be focused around supporting innovation and technology-based businesses was strongly supported by a number of submissions received on the rezoning proposal.</p> <p>Delivering supporting accommodation uses will be investigated as part of the SSP Study for the broader Central Precinct. This will explore opportunities to provide housing for employees, students, key and creative workers who may otherwise be unable to afford to live close to the technology and innovation precinct.</p> <p>Given the above, the proposed SEPP amendment to incentivise innovation and technology-based land uses will remain as exhibited.</p> <p>Please refer to Section 4.1.1 of the RtS Report.</p>
		EIE	Development contributions	Consideration of the contributions framework and mechanisms to deliver infrastructure for the sub-precinct to be determined through the planning process for the wider Central SSP.	The Consortium will be making a significant contribution to the Western Gateway sub-precinct through works-in-kind currently being negotiated through the USP process. The Consortium requests the details of any proposed framework and mechanisms being investigated be disclosed prior to the SEPP being finalised and the Consortium (in consultation with TfNSW) be provided with an opportunity to provide meaningful feedback.	Please refer to Section 4.8 of the RtS Report.
		EIE	Design Guide	The proposed planning instrument needs to include reference to the Design Guide to inform future development of the sub-precinct.	The Consortium supports the Design Guide being referenced in the proposed planning instrument (or being subject to a Section 9.1 Ministerial Direction) to ensure that it is clear that it replaces the need for a site specific DCP and has statutory weight	Noted. The proposed SEPP Amendment will be amended to provide statutory weight to the Western Gateway Design Guide.

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
<b>Community</b>			
1 (ID: 68186)	Withheld	I think this area should become an extension of the City, with lots more jobs based around Central. It is already a great transportation hub and it should live up to its name... Central, the real centre of Sydney with high density of offices, entertainment (which is currently missing), shopping and food / drinks places. There is currently so much 'dead' space around Central Station, unused. It also needs better pedestrian connections from chippendale to surry hills. It could be the new high rise hub, with hieghts of buildings finally able to compete with Melbourne!	Noted.
3 (ID: 68196)	Withheld	I make this submission as a local [REDACTED]. I think this is an excellent opportunity to revitalise this part of the city whilst emphasising the unique character and heritage aspects of the area. As a resident, I am most interested in connectivity. At the moment, passing through Central station, the Devonshire Tunnel and Belmore Park are all unpleasant, particularly at night, where at times I would describe it as unsafe. As a consequence, despite being on the doorstep of Haymarket, Ultimo and Broadway I feel completely disconnected. I would like to be able to access them and move between them with confidence, which means creating a lively environment in all of the new precincts. I think encouraging retail and hospitality venues with character and licences which allow them to operate well into the evening will be important in achieving this	Noted. The proposed B8 Metropolitan Centre zoning permits a wide range of employment, innovation and technology business uses, while also permitting a diversity of compatible land uses including retail and hospitality.
20 (ID: 68456)	Stephen Dewar	It is very important that the historical building of Central Station be not overwhelmed by modern additions. Also, ease of better connections to Elizabeth St and George St be constructed. The eateries should include reasonably priced food outlets for train journeys. What about some more trees/ greenery. And be sustainable...no single use plastics, especially takeaway coffee cups that can't be recycled.	Please refer to Section 4.2.1 of the RtS Report.
24 (ID: 68476)	Withheld	This is a great proposal and hopefully the kickstarter for the entire Central Precinct Strategic Vision. Having Atlassian (and if rumours are to be believed, google) as major tenants of these buildings is very exciting, and could result in Sydney's new silicon valley precinct. The extra public space as well as new western access to Central Station are huge benefits too. I hope this project goes ahead as soon as possible!	Noted.
28 (ID: 68536)	Alexander King	I am strongly against any construction atop the Central's Flying Junction as it would disturb the look and feel of the area. Customers enjoy seeing their train move across the junction as it comes into the station. Additionally any plans to build above the junction would look out of place as it would have to account for the height of the junction and the road bridge for the metro construction when constructing the towers. To cover Central's tracks would be an insult to the Sydney Trains network and our city. It would be like building over the water in Darling Harbour or the Domain or Hyde Park.	The Bradfield Flying Junctions are not subject of this rezoning proposal. Please refer to the Central Precinct SSP Response to Submissions Report under separate cover for further details.
29 (ID: 68541)	Paul Scf	Proposals need to include and prioritise active transport. Walking and cycling links needs to be fundamental to all zoning decisions. Zoning proposals need to minimise access for cars.	Please refer to Section 4.3 of the RtS Report.
37 (ID: 68666)	Adam Lawrence-Slater	The strategic vision and the planning framework needs to ensure that Prince Alfred Park is not overshadowed by the new buildings in the precinct, particularly during autumn/winter/spring.	Please refer to Section 4.5.1 of the RtS Report.
40 (ID: 68716)	Linda Tran	This project looks amazing. I love everything about it, including an upgrade to the streetscape of railway square, the new entrance to central station, the extension of our CBD southwards, and that one of Australia's largest tech companies will anchor the development. I hope this goes ahead as soon as possible, and hopefully the rest of the precinct will soon follow!	Noted.
45 (ID: 68781)	Mark Hansen	I support the redevelopment. Make the towers even taller though, we need even more real estate, and the tips of the towers covering a marginal part of the park on the shortest day doesn't really matter much in real terms.	Noted. Please refer to Section 4.4.2 in relation to building height and floor space ratio.
56 (ID: 69002)	William Parker	5 Western Gateway Refurbish existing spaces and buildings using renewable materials and energy sources. Interface with the City of Sydney's proposed third square, framed by existing heritage items such as the former Parcels Post Office, Inward Parcels Shed and Marcus Clarke Building.	Please refer to Section 4.2 in relation to responding to heritage.
		Facilitate movement of pedestrians between Central Station, the sub-precinct and the surrounding areas.	Please refer to Section 4.4.2 in relation to movement, access and public spaces.
		Use landscaping to provide shade, reduce urban heat and soften the urban environment.	Supporting the RtS report is a Public Domain Strategy (refer to <b>Appendix B</b> ) which has been prepared to ensure a coordinated approach to delivering a high quality and activated public domain. The Public Domain Strategy highlights that planting of Western Gateway sub-precinct will be meaningful and an integral part of the development. Under-storey planting

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
			<p>will be engaging, seasonal and bring delight to commuters, workers, students and visitors daily, rather than a static green backdrop.</p> <p>Tree planting will be located to respond to light conditions and pedestrian movements.</p>
63 (ID: 69036)	Neville Williams	<p>Stage 1 of the whole Central SSP project is described as the innovation and technology precinct will be a major hub for tech industries, universities, research institutes, visionaries and start-ups. The precinct will be a leader in collaboration, innovation and jobs for the future.</p> <p>Balance this up at the same time by also commencing Stage 1 with something that lights our humanity. Please see my fuller submission addressing Central SSP - The Strategic Vision".</p> <p>Don't you reckon that you need to have someone around who sees things differently?</p>	Noted. Refer to the Central Precinct SSP Response to Submissions Report under separate cover for further details.
65 (ID: n/a)	Sally Quilter	<p>Western Gateway Rezoning Proposal</p> <p>The Suburban bus area between Lee and Regent Street is impossible to use with small children.</p> <ol style="list-style-type: none"> <li>1. If it rains everyone gets wet.</li> <li>2. If approaching the bus area from the station, Regent Street has four lanes of traffic, it noisy dirty and dangerous.</li> <li>3. If approaching from the Adina hotel there are cars coming out of the car park of the hotel, pedestrian visibility is restricted, and thus it is dangerous with small children.</li> <li>4. Move the bus area to the little park at the side of the station where the taxis turn into the station area. And make the bus area into a park marking the entrance to the city and George Street.</li> </ol> <p>I do not make any donations to political parties.</p>	<p>Whilst the Western Gateway Rezoning Proposal does not include the bus interchange, all public domain within the sub-precinct will be designed to be accessible to all, including children.</p> <p>The existing and future transport network capacity (including heavy and light rail, bus, active transport, and point-to-point services) will be considered as part of Stage 2 of the Central Precinct SSP planning process which will be informed by a Transport Study. Refer to the Central Precinct SSP Response to Submissions Report under separate cover for further details.</p>
66 (ID: 69056)	Redacted	<p>I object to the proposed planning control changes. The state government overwriting the LEP is objectionable.</p>	Whilst the determination of this rezoning proposal is to be made by the State Government, the City of Sydney have had an ongoing role in the project as part of the Project Working Group and Project Review Panel, and have noted their general support for the rezoning proposal within their submission (submission No. 90).
		Heritage and sense of place will be diminished by the proposals. Specifically altering YHA a recognised example of excellent adaptive reuse.	<p>Please refer to Section 4.2 of the RtS Report.</p> <p>The proposal for Block A seeks to substantially integrate the existing inward parcels shed (the YHA building) as part of the new building design. It is proposed that the existing shed building will be carefully dismantled and stored during ground works for the new Atlassian tower, and then reconstructed as part of the development. The shed building will provide key arrival and gathering spaces within the new development maximising the activation and interpretation opportunities for this space.</p>
		Excessive height limits proposed. Any development should be below Central Clock Tower, not roughly TWICE its height. I object yo the added overshadowing of Railway Square and Prince Alfred Park, especially spring and autumn commuting peaks, which adds to lighting costs, associated emissions and worsens peoples travelling experience.	Please refer to Section 4.4.2 of the RtS Report in relation to building height and floor space ratio, and Section 4.5.1 in relation to overshadowing.
		The described benefits to the public realm are aspirational, with the precinct already 'activated'.	Noted.
		The waste of demolishing part life Henry Deane complex is objectionable. All refurbishment and new construction should have 'Condition of Consent' to be NABERS 6 star certified.	Please refer to Section 4.6 of the RtS Report with regard to sustainability targets.
		Redoing Central's Wayfinding system is supported - the most recent one is half-baked and generally about a third the size of symbols and text needed.	It is noted that the NSW Government is currently delivering Sydney Metro which will service Central Station by 2024. Station Wayfinding will be upgraded as part of this project.

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		Reducing the Special Character Area is objectionable, this character will be damaged by trying to manufacture a weak equivalent.	<p>It is noted that the majority of the Western Gateway sub-precinct, including all of Block B is currently explicitly excluded from the Special Character Area listing. Nevertheless, the Block B HIS and supporting heritage guidelines give particular consideration to the principles for the special character area which have informed Block B's proposal.</p> <p>While a specific Conservation Management Plan will be prepared as part of Block A's DA package. This will respond to its site-specific heritage context to ensure that the heritage values of the place and its individual elements are recognised and respected. This will be informed by the detailed policy included in the new Conservation Management Plan, which will provide guidance on the retention, conservation and interpretation of the significant aspects of the place.</p> <p>It is also noted that the Strategic Framework and Stage 2 of the SSP Study for the broader Central Precinct provides an opportunity to take a fresh look at Railway Square and Central Precinct in the context of a clear intent to unlock the precinct as Central Sydney's new southern extension. On this basis, it is Transport for NSW's preference not to adopt these principles in their current form, but rather incorporate their intent into the Strategic Framework for the Central Precinct in a number of locations.</p> <p>Please refer to Section 4.2.1 of the RtS Report in relation to responding to heritage.</p>
		Pedestrian movements in this area are growing, with developments elsewhere already increasing space needed for pedestrians, deliveries and transit. These changes must not increase access and egress times to the buses, trams and trains hubbed at Central.	Please refer to Section 4.3 of the RtS Report
		Building over High Voltage rail wiring is awkward, and has not been done well in Sydney. Such a constraint to improving current rail infrastructure and future Higher Speed Rail services is to be prevented.	The over station development is not included within this Western Gateway Rezoning Proposal. Please refer to the Central Precinct Response to Submissions report under separate cover for further details regarding the over station development.
68 (ID: 69066)	Yvonne Poon	<p>This area must abide by the design policies put into place by the NSW Government Architect's Movement &amp; Place framework. This includes integrated transport planning and community access (in particular to support active travel). The Western Gateway is an important access corridor between Central station East and West and it is important that safe, easy movement is maintained. It would be great if cycling access could be included in future planning, to better connect the Central transport interchange with surrounding local areas, as well as local and regional cycling routes. Businesses and jobs in technology and innovation often attract those who enjoy the living streets idea of walking and cycling to work.</p> <p>Accessibility is also a key in this area, as Central precinct is made up of such differing heights, it is important to have good access for those who have specific mobility requirements.</p>	Please refer to Section 4.3 of the RtS Report in relation to pedestrian and cycle connectivity.
71 (ID: 69081)	Redacted	<p>Submission on Draft Strategic Vision for the Central State Significant Precinct (SSP)</p> <p>Henry Deane Plaza</p> <p>I support the vision to making this an attractive place for people to spend time rather than just pass through. People do like to mingle in this area and sit and have their lunch, particularly on the and around the tree planter boxes outside 18 Lee Street. Currently, the sunken area can be cold and draughty, particularly in winter months, possibly due its low position and the covered areas in the plaza. The large grassed area with pavers that look like the old railway lines located outside Government office is not used to its full advantage. People tend to walk around the grass rather than make use of this space. It is perceived as an obstacle rather than a positive place to sit. This area could be enhanced as a natural area for siting on the grass whilst promoting the railway heritage of the area.</p>	Noted. The vision for public domain at the Western Gateway sub-precinct is further outlined within the Public Domain Strategy at <b>Appendix B</b> . Please also refer to Section 4.3 of the RtS Report for discussion around public spaces.
79 (ID: 69121)	Redacted	I oppose the change in the maximum building heights proposed to be included for the Western Gateway sub-precinct for both Block A (200.2m, increased from 7.5m) and Block B (205.8m, increased from 35m). These increases are excessive and will increase canyoning and sky-exposure effects	Please refer to Section 4.4.2 of the RtS Report in relation building heights and Section 4.5 in relation to amenity.

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		in particular (and shadowing to a lesser degree) in what is already a deeply shaded and wind-affected part of the city. The physical bulk looking up will also be oppressive. Consequently, this also acts to oppose the changes to the proposed maximum floor space provisions.	
		I oppose the proposal to remove the “Western Gateway sub-precinct’ entirely from the Special Character Areas Map. The city is already in risk of jettisoning too much of its remaining special-character areas as it is. Once gone, they can never be brought back.	<p>It is noted that the majority of the Western Gateway sub-precinct, including all of Block B is currently explicitly excluded from the Special Character Area listing. Nevertheless, the Block B HIS and supporting heritage guidelines give particular consideration to the principles for the special character area which have informed Block B’s proposal.</p> <p>While a specific Conservation Management Plan will be prepared as part of Block A’s DA package. This will respond to its site specific heritage context to ensure that the heritage values of the place and its individual elements are recognised and respected. This will be informed by the detailed policy included in the new Conservation Management Plan, which will provide guidance on the retention, conservation and interpretation of the significant aspects of the place.</p> <p>Furthermore, the Strategic Framework and Stage 2 of the SSP Study for the broader Central Precinct provides an opportunity to take a fresh look at Railway Square and Central Precinct in the context of a clear intent to unlock the precinct as Central Sydney’s new southern extension. On this basis, it is Transport for NSW’s preference not to adopt these principles in their current form, but rather incorporate their intent into the Strategic Framework for the Central Precinct in a number of locations.</p> <p>Please refer to Section 4.2.1 of the RtS Report in relation to responding to heritage.</p>
		Given the State Government’s willingness to impose built forms on the public that are an anathema (e.g. the Barangaroo buildings “” especially the casino “” and the recently proposed Star skyscraper in Pyrmont), the NSW public needs to reassert its say over unacceptable proposed building forms and detrimental cityscape changes, with this sub-precinct being one. As noted by Chris Uhlman in his 14 August 2019 column ( <a href="https://www.smh.com.au/national/forget-the-hardyoutdoor-image-we-re-really-a-bunch-of-wowsers-20190813-p52gkg.html">https://www.smh.com.au/national/forget-the-hardyoutdoor-image-we-re-really-a-bunch-of-wowsers-20190813-p52gkg.html</a> ), governments in Australia are suspicious of the people, who cannot be trusted, and therefore act in secretive ways and seek to keep involvement in decision-making from them. Whilst the process that this is going through is noted (and appreciated), the opportunities for the public to have meaningful input (even through local council submissions) is limited (in reality), as illustrated by the WestConnex project, amongst others.	Noted.
		In my view, the Western Gateway sub-precinct proposal is overbuilt and needs to go back to the drawing board and be scaled down for further reconsideration. If anything, there is a greater need for more green, open spaces in the Central Precinct rather than another couple of bulky skyscrapers.	Please refer to Section 4.4.2 of the RtS Report in relation building heights and floor space ratio.