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BLOCK C, WESTERN GATEWAY SUB- PRECINCT

Proponent Response to
Submissions

Prepared for
TOGA
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1. INTRODUCTION

On behalf of the Toga Group (**TOGA**), the long-term Crown leaseholder (**the developer**) for 'Block C' in the Western Gateway sub-precinct, this letter seeks to provide a brief response to the recent public exhibition of the draft planning controls as it specifically relates to 2 and 8A Lee Street, Haymarket.

We note that public exhibition of the draft planning controls for Block C occurred between 16 December 2020 until 29 January 2021. In March 2021 the NSW Department of Planning, Industry and Environment (**DPIE**) provided a 'Submissions Summary' report in relation to the Central State Significant Precinct (**CSSP**) – Western Gateway Block C proposal.

In response to the Submissions Summary report, and subsequent feedback received from the government Project Review Panel and the Project Working Group, this document outlines how TOGA's project team have responded to the key themes identified in submissions received during and after the completion of the public exhibition period. This response is supported by further details provided by expert consultants on the project team as required.

1.1. BACKGROUND

The preparation of built form controls for the Western Gateway sub-precinct have been the subject of detailed, ongoing engagement and consultation with a range of key government stakeholders. Draft planning controls for the sub-precinct were first placed on public exhibition in October – November 2019, which notably comprised new maximum height of building and gross floor area (**GFA**) provisions for Block A and Block B.

This 'phase 1' rezoning was finalised in August 2020, resulting in new planning controls being introduced to the *Sydney Local Environmental Plan 2012 (SLEP 2012)* for Block A and Block B of the Western Gateway sub-precinct. Contained within these new controls includes the requirement to prepare, and to consider future development against, design guidelines relating to the design and amenity of the Western Gateway sub-precinct. These design guidelines have been prepared in the form of the 'Draft Western Gateway Design Guide', which is in the process of being revised for endorsement by the Planning Secretary.

As such, it is noted that some of the comments contained within the public and government submissions received during the public exhibition of the Block C or 'phase 2' rezoning will be addressed through the finalisation of the 'Western Gateway Design Guide', in addition to a 'Western Gateway Publicly Accessible Space Strategy'.

These two documents will apply across the whole sub-precinct and will include design criteria that relate to sub-precinct wide matters including (though not limited to) the design and function of publicly accessible open space across the site, pedestrian amenity, wind criteria, management of site-wide loading and access, sustainability, and site-wide heritage interpretation and conservation. This report has been prepared to provide a more specific response to the items raised during the exhibition period relating to the future built form on Block C of the sub-precinct.

2. FURTHER CONSULTATION

Since the conclusion of the exhibition period and the receipt of the Submissions Summary report, further comments on the 'phase 2' rezoning have been received by representatives from the Greater Sydney Commission, City of Sydney, DPIE, and NSW Government Architect's Office via the Project Review Panel process.

On 05 May 2021 the Project Review Panel convened to review the preliminary Response to Submissions report prepared by TfNSW and the developer. This final report has been informed by the subsequent feedback received from the Project Review Panel as outlined in the following table.

Table 1 Developer Response to Project Review Panel Recommendations

Project Review Panel Recommendation	Developer Response
Connecting with Country	
Recommend that engagement be undertaken, prior to the approval of a DA or approval of a competitive design brief, in consultation with the City of Sydney's Aboriginal and Torres Strait Advisory Group and GANSW, and that the RTS demonstrate that an appropriate principles and commitments framework will be put in place to ensure Connecting with Country considerations are addressed.	<p>The developer commits to engagement with the City of Sydney's Aboriginal and Torres Strait Advisory Group and GANSW prior to the <i>lodgement</i> of a DA for the comprehensive redevelopment of Block C. It is proposed that this commitment is included as a requirement within the final Design Guide.</p> <p>It is further noted the Draft Design Competition Brief, to be endorsed by GANSW prior to the commencement of a design competition, outlines the strategies of the Connecting with Country Draft Framework and requires that competitors within the competition:</p> <ul style="list-style-type: none"> ▪ consider opportunities for on-site interpretation of storytelling and continuity of the site history, ▪ must demonstrate in the Final Submissions how early consideration of the Connecting with Country strategies and principles have been considered, and ▪ are encouraged to embed Indigenous Architects or relevant advisors within their design teams to ensure the principles of the Connecting with Country framework are achieved.
Built form and heritage context	
Recommend the RTS include scale plans including the area of max. envelope and the proportion that the 1,300sqm GBA floorplate occupies.	Appendix A includes scaled plans prepared by FJMT which illustrate the extent of the proposed planning envelope that could be occupied with a maximum 1,300sqm GBA floorplate.
Reference the need to flexibility within the 1,300sqm GBA floorplate to ensure the design excellence process can achieve suitable outcomes.	<p>The plans at Appendix A illustrate the flexibility within the planning envelope to achieve a 1,300sqm GBA floorplate.</p> <p>As outlined at Section 4, it is proposed that the Design Guide is updated to make clear that flexibility is provided in the planning envelope to ensure the design excellence process can achieve suitable outcomes. As demonstrated within the report at Appendix A there is flexibility within the</p>

Project Review Panel Recommendation	Developer Response
	<p>envelope to achieve architectural variation and alternative core and structural solutions subject to the completion of an Architectural Design Competition for the site. Such a competition will require calibre Architects to balance a hierarchy of design considerations to achieve a high quality, and balanced outcome for the site within the constraints of the maximum planning envelope defined with the Design Guide.</p>
<p>Include reference to key metric of 41,000sqm max. tower envelope and include requirement that void areas not be deducted from gross floor area calculations.</p>	<p>The site-specific provisions proposed for Block C are clear that the maximum gross floor area (GFA) permitted within the tower envelope is 41,000sqm. This GFA is to be calculated in accordance with the definition in the SLEP 2012. Given the Design Guide is a subordinate document to the SLEP 2012, the method for calculating GFA on Block C cannot be inconsistent with the provisions of SLEP 2012 which permits the exclusion of voids from the calculation of GFA. Further, it is noted that the calculation of GFA on Block A and B within the sub-precinct also allows the exclusion of voids as per the SLEP definition. This recommendation is therefore not supported by the developer. Notwithstanding, it is noted that bulk and scale of the building is mitigated through other design criteria and controls including:</p> <ul style="list-style-type: none"> ▪ Maximum floorplate control of 1,300sqm gross building area; ▪ Minimum setbacks to Block A; ▪ Maximum floor plate protrusion to the south; ▪ Minimum setbacks to the primary heritage facades of the former Parcels Post building; ▪ Objectives for view and visual impacts; and ▪ A maximum GFA controls for the site.
<p>The full suite of design guide amendments recommended by Heritage NSW should be included or, if the proponent considers that this cannot be achieved, appropriate and detailed justification should be provided.</p>	<p>The recommendations for amendments to the Design Guide provided by Heritage NSW are addressed at Section 4 of this report.</p>
<p>Physical and structural impacts on the former Parcel Post building</p>	
<p>Recommend the RTS include detail of any alternative approaches/ options and further justification be provided to address the issue of minimising structural impacts / no structural impacts raised by Heritage NSW and CoS during the public exhibition.</p>	<p>The Structural Options Analysis provided by Robert Bird Group at Appendix E provides a full analysis of alternative options considered to structurally support a vertical addition above the former Parcels Post building. As outlined in this assessment, the proposed reference design represents a minimal intervention solution to the significant heritage fabric of the former Parcels Post building that aligns columns to</p>

Project Review Panel Recommendation	Developer Response
	<p>the existing grid structure of the original building and isolates façade intervention to the eastern façade.</p> <p>As outlined in the Structural Options Analysis, a cantilevered structural solution for the proposed planning envelope is not feasible. However multiple core location options are feasible within the proposed planning envelope, to be explored through the Architectural Design Competition.</p> <p>Notwithstanding the proposed structural solution provides an acceptable heritage and visual impact on the site as outlined in the reference design by FJMT, it is noted that the Design Guide is proposed to be updated (refer to Section 4) to ensure that any vertical addition to the former Parcels Post building must demonstrate an innovative structural solution. Such a solution is to ensure that there is minimal structural encroachment within the vertical separation zone, and minimal structural encroachment to heritage fabric of the former Parcel Post building.</p>
<p>Recommend the design guide be amended to include reference to the need for an innovative structural response in order to minimise impacts on the fPPb. This will ensure the design comp further explores more innovative solutions in the detailed design stage.</p>	<p>As stated above, this recommendation has been adopted as a proposed amendment to the Design Guide at Section 4 of this report. The onus is on competitors to consider innovative structural solutions within the maximum planning envelope to minimise intervention to the key heritage facades of the building (northern, western, and southern facades), limit structure within the vertical separation zone to provide as much as possible a clear and separate break between the 'old and the new', and coordinate any structure through the former Parcels Post building with the existing core and structural grid of the building.</p>
<p>Recommend that no core elements be located in or through the former Parcels Post Building.</p>	<p>It is firstly noted that the former Parcels Post building also requires core elements to be upgraded within the existing building to meet contemporary building codes, whether a vertical addition is proposed on the site or not (refer Appendix E). Further, contemporary building cores have been previously included through the former Parcels Post building as outlined in the Heritage Impact Statement prepared by Urbis and submitted with the rezoning application. As such, core elements are fundamental to the integrity and stability of the former Parcels Post building and will likely be upgraded, relocated and/or amended in any future re-use of the building.</p> <p>More specifically to the point of required new core to support the tower form, the Structural Options Analysis provided by Robert Bird Group at Appendix E outlines the implications</p>

Project Review Panel Recommendation	Developer Response
	<p>of removing new core elements to support the tower from within the former Parcel Post building.</p> <p>While it is critical that structural elements to support the tower protrude the former Parcel Post building to some extent, it is recognised by the developer that the impacts associated with any structure or core through the former Parcel Post building must be minimised. As outlined in Appendix E this includes aligning internal structure to the existing structural grid of the existing building. Further, new core locations are limited to the eastern and possibly southern extent of the planning envelope, subject to exploration through the Design Competition.</p> <p>The ultimate location of a new core within the extent of the maximum planning envelope will be determined based on the mitigation of impacts to original and significant heritage fabric, visual impacts from structure within the vertical separation zone as viewed from the public domain, and the visual prominence of the northern and western facades of the former Parcel Post building. Further any structure to the south of the existing southern façade is as far as possible to be designed with transparent materials and with void spaces to ensure a significant portion of the original facades, in particular the southern façade, can be interpreted from the public domain.</p> <p>As such, in response to this recommendation additional provisions are proposed within the Design Guide at Section 4 to ensure that any structure or core through the former Parcel Post building results in an appropriate visual, heritage, and structural impact.</p>
<p>Include evidence that further detailed analysis into the minimisation of encroachment into the vertical separation zone has been undertaken in accordance with the PRP's previous advice.</p>	<p>The report provided by Robert Bird Report at Appendix E documents how the structure indicatively located within the vertical separation zone illustrated within the reference design has been minimised.</p> <p>Further, an amendment is proposed to the Design Guide at Section 4 to ensure that any vertical addition to the former Parcel Post building must demonstrate an innovative structural solution that minimises any structural encroachment within the vertical separation zone and to heritage fabric of the former Parcel Post building.</p>
<p>Include further setback analysis as the PRP considers that the current RTS does not appropriately address the intent of the Heritage NSW submission which is seeking greater setbacks on the north-east and</p>	<p>The setback analysis provided by FJMT at Appendix A and as discussed at Section 3.3.2 of this report compares alternative setback controls based on the existing provisions</p>

Project Review Panel Recommendation	Developer Response
south-west corners of the fPPb (without reducing the 21m between the north-west corner and the chamfer).	<p>of the Sydney Development Control Plan 2012 and the proposed Design Guide.</p> <p>It is noted that the Heritage NSW submission requested consideration of additional setbacks behind the full extent of the northern and western facades. To adopt such a setback at this stage would undermine the ability for future development to achieve a maximum 1,300sqm floorplate (GBA) which is a threshold issue for the development. As outlined above, the proposed setbacks and planning envelope do not preclude the ability for detailed designs to increase setbacks from these facades where achieving other criteria in the Design Guide and project requirements, given there is a degree of flexibility in the planning envelope to achieve design excellence.</p> <p>The chamfered setback also supports additional view sharing towards the Central Station Clocktower in addition to supporting the prominence of the former Parcel Post building from key view corridors.</p> <p>To adopt the potential increase in setback would therefore not only undermine the ability of schemes to achieve the key requirements of the project, it would also remove any flexibility in the planning envelope for future design refinement. The alternative would be contrary to the advice of the SDRP.</p>
Minimum 12.6m clearance for the vertical separation zone from top of reconstructed roof to underside of the tower above;	As outlined at Section 4, it is proposed that the Design Guide is updated to reflect this recommendation.
No lift cores and minimal structure within the vertical separation zone;	As outlined previously, it is not proposed that the Design Guide is amended to reflect this recommendation. Rather, the Design Guide is proposed to be amended to require structure within the vertical separation zone to be minimised.
Encroachment within the vertical separation zone must be minimised and metrics must be included (in accordance with previous PRP advice).	As outlined at Section 4, it is proposed that the Design Guide is updated to reflect this recommendation. The original suggestion for metrics to be included in the Design Guide was, as we understand, proposed in response to earlier proposal to include retail, food and beverage, and or plant enclosures within the vertical separation zone. As per the revised Design Guide (refer Section 4), there is to be no enclosure other than necessary structural elements within this zone and as such a metric definition of a setback such as that outlined within the previous PRP advice is no longer considered necessary. Further, it is considered more appropriate to require any structural design in a future

Project Review Panel Recommendation	Developer Response
	development application to demonstrate that the structure within this zone has been minimised to the extent reasonably possible, rather than comply with an arbitrary metric.
Reconstruction of the original former Parcel Post building roof	
Recommend the RTS be updated to appropriately reference the reconstruction of the original roof which was double pitch.	As outlined at Section 4, it is proposed that the Design Guide is updated to reflect this recommendation.
View and visual impacts	
Recommend the RTS be amended to ensure diagrams and commentary are based on the planning envelope, not the reference scheme.	Analysis for many key matters such as overshadowing, view and visual impact, and setback analysis has been undertaken on both the planning envelope and the reference scheme. In response to this feedback the analysis on the planning envelope has been highlighted and strengthened in the Response to Submissions Report and supporting documents. It is noted that due to the maximum GFA control proposed for the site, in addition to the maximum floorplate GBA permitted in the Design Guide, that the maximum planning envelope cannot be fully occupied by a detailed design for the development.
Promote the use of materials or other measures such as transparent materials, void spaces at lower levels, (adjacent to the eastern and southern facades) to ensure the original facades can be interpreted.	As outlined at Section 4, it is proposed that the Design Guide is updated to reflect this recommendation for all original heritage facades.
Measures to ensure compliance with the DRP's previous advice that the southern extension of the envelope be as far as possible not enclosed.	As outlined at Section 4, it is proposed that the Design Guide is updated to reflect this recommendation.
Site specific Conservation Management Plan (CMP)	
Recommend that a precinct-wide CMP be adopted that includes an initial specific focus on the Western Gateway (to allow for the progression of the Block C DA in the short term), and that can be updated over time to incorporate future planning for the rest of Central Precinct in the long term.	As outlined at Section 4, it is proposed that the Design Guide is updated to reflect this recommendation. It is noted that TfNSW have initiated the preparation of this plan to guide the comprehensive development of the precinct.
Recommend that the design guide be amended to ensure that a precinct-wide	As outlined at Section 4, it is proposed that the Design Guide is updated to reflect this recommendation.

Project Review Panel Recommendation	Developer Response
<p>CMP be required in accordance with the above recommendation.</p>	
<p>Consultation with the NSW Heritage Council</p>	
<p>Recommend that further meaningful, workshop-style, engagement be undertaken with the NSW Heritage Council prior to the approval of a DA or approval of a competitive design brief.</p>	<p>The developer commits to engagement with the NSW Heritage Council in a workshop-style format if preferred by NSW Heritage Council (at their discretion) prior to the <i>lodgement</i> of a DA for the comprehensive redevelopment of Block C. It is proposed that this commitment is included as a requirement within the final Design Guide.</p> <p>We note that engagement with the NSW Heritage Council to date has indicated that further consultation is not required until after the completion of a design competition when an indicative design and design team have been selected for the project.</p>
<p>Public domain</p>	
<p>Recommend the Publicly Accessible Space Strategy be updated to include:</p> <p>Additional diagrams and sketches be incorporated into the strategy to better illustrate how key parts of the precinct will operate and look in the future (in particular Henry Deane Plaza, Devonshire St Tunnel and its access from Lee St).</p> <p>Clarifications around the nature of the proposed access arrangements such as stairs and ramps with a focus on ensuring appropriate dimensions and gradient can be achieved to ensure accessibility.</p> <p>Recommendation that any vertical circulation requiring lifts in the public domain be embedded into the adjacent built form.</p>	<p>TfNSW are the authors of the Publicly Accessible Space Strategy and will provide a response to this recommendation in the Central Precinct Western Gateway (Block C) Rezoning Proposal Response to Submissions Report dated June 2021.</p>
<p>Pedestrian modelling</p>	
<p>Recommend the RTS be updated to demonstrate appropriate justification of the proposed pedestrian network and include any modelling outcomes/assumptions used to inform the proposal.</p>	<p>Pedestrian movement data used by TfNSW to inform the proposed pedestrian network through the Western Gateway sub-precinct and in particular on Block C is addressed at Section 3.3.1 of this report.</p>

Project Review Panel Recommendation	Developer Response
Wind	
<p>Recommend the design guide be finalised and submitted with the RTS and that the wind comfort criteria be consistent with the PRP's previous advice noting the need for walking, standing and sitting criteria at key locations.</p>	<p>We note that the final Design Guide will be updated with the wind comfort criteria as determined as appropriate by DPIE. The revised Pedestrian Wind Comfort Assessment at Appendix C has been prepared to respond to this agreed wind comfort criteria. This revised design criteria is addressed at Section 3.4.2 of this report.</p>
<p>Recommend the proponent carefully consider its RTS approach to wind, noting that the wind issues are significant. It is recognised that the wind issues located between Blocks A and B will require a coordinated proponent response, however other wind issues to the north and south of the proposed envelope should be addressed by the Block C proponent.</p>	<p>A revised Pedestrian Wind Comfort Assessment has been prepared (Appendix C) to address the latest detailed development proposed on Block A and Block B to understand the resulting wind conditions likely to affect future development at Block C. The revised Pedestrian Wind Comfort Assessment provides specific recommendations relevant to Block C to be addressed in the preparation of a detailed development on the site.</p>
Sustainability	
<p>The panel noted its previous advice regarding the need for the Western Gateway design guide to be finalised and submitted with the RTS.</p> <p>Recommend the design guide be finalised and submitted with the RTS and that it address the previous advice of the PRP.</p>	<p>We note that the final Design Guide will be updated by TfNSW with the criteria for sustainability as determined as appropriate by DPIE.</p>

3. RESPONSE TO THE KEY THEMES RAISED IN SUBMISSIONS

3.1. HERITAGE IMPACTS

As summarised within the DPIE Submissions Summary, the relationship between the proposal and the heritage significance of the former Parcels Post building and Central Station precinct was raised throughout many of the community submissions received. The City of Sydney, Heritage NSW, and the National Trust submissions also raised several concerns relating to heritage impacts. These concerns have been addressed in the following sections as supported by a technical response prepared by Urbis attached to this letter. Concerns raised regarding heritage impacts generally related to the following themes:

- Responding to the existing heritage context of the site
- Extent of intervention into the existing building
- Curtilage between any new development and the existing building

3.1.1. Responding to Existing Heritage Context

It is acknowledged that the landmark qualities and setting of the existing former Parcels Post building will be impacted as a result of new development within the Western Gateway sub-precinct. A new setting will be established positioning the former Parcels Post building at the forefront of a new technology and innovation precinct, which celebrates its past and future role within global Sydney.

As identified within the Central Precinct Draft Strategic Vision, the Western Gateway sub-precinct is envisaged to become a visual marker for the Central Precinct through the inclusion of city-scale buildings that create a focal point for the State Government's aspiration for a new innovation and technology hub. New planning controls that support city-scale buildings within Block A and Block B of the sub-precinct have been gazetted, which establishes the prevailing scale and density of new development in the sub-precinct.

The proposed new planning controls for Block C is consistent with this prevailing scale, however it is noted that the density proposed to be permitted on Block C is reduced compared to these adjacent blocks (notably only 56% of the permitted GFA on Block A notwithstanding a greater site area). The reduction in density is considered suitable to reflect the heritage building to be retained on the site, provide appropriate setbacks to the key heritage facades of the original building, and ensure a slender tower is delivered on the site.

As further mentioned within the Planning Justification Report prepared by Urbis within the phase 2 rezoning application, the maximum GFA proposed to be permitted within the tower envelope (41,000sqm) does not utilise the full extent of the tower planning envelope. This allows flexibility for detailed designs within an Architectural Design Competition to demonstrate a slender tower within the envelope, likely not relying on the maximum height permitted under the sun access plane protecting Prince Alfred Park.

As such, the proposal provides a context-responsive planning envelope and proposed new planning controls that will enable a balanced distribution of height, density, and scale throughout the Western Gateway sub-precinct, including against the context of an emerging new character outlined within the draft Central Precinct Strategic Vision.

The Heritage NSW comments recognise the impact that large scale towers within the Western Gateway sub-precinct will have on the setting and character of the former Parcels Post building and the Central Railway Station site. In their submission Heritage NSW state that this changing character underscores the importance of key heritage values, elements, and views and vistas remaining central to any redevelopment of the area. These points are acknowledged and supported through the proposed planning controls for Block C, notably by:

- Retaining key heritage values and fabric of the existing building, through management via a future precinct-wide Conservation Management Plan and guided through design principles contained within the Draft Western Gateway Design Guide and the Conservation Management Strategy submitted with the phase 2 rezoning application.
- Ensuring that development does not result in a net adverse impact on the key heritage components of the building, most notably the original external façades of the building. It is noted that improvements can be made to original components of the building including increased public access through the ground

plane of the building, and interpretative reconstruction of the original roof form of the building. This is required through the Draft Western Gateway Design Guide (refer draft provision 3.2.1(8)(f)).

- Acknowledging that changes are proposed to the eastern façade of the building, however any such intervention is only to be in accordance with principles articulated within the Conservation Management Strategy submitted with the rezoning application (note Principle 4 – Managing Change).
- A vertical separation zone with required to separate the 'old from the new', comprising a minimum 12.6m height from the reconstructed original roof form of the former Parcels Post building to the underside of a new tower form. Any structure required to support the new tower within the vertical separation zone is required to be minimised and not enclosed to the extent possible. This requirement is to be regulated through provisions in the Draft Western Gateway Design Guide (refer Section 4 of this report).
- Ensuring that the proposed development is spatially well separated from immediate surrounding heritage items through setback and tower location provisions within the Draft Western Gateway Design Guide. Further by providing a chamfered setback from the northern and western building facades, the proposed development is also spatially set back and well separated from the Sydney Terminal building and Clock Tower so that it does not dominate or block views to those items. The location and form of the proposed tower does not encroach on visually documented public domain.

While the City of Sydney have stated that they do not regard the site as a suitable development site for a new tower, it is noted that the proposed planning envelope has been developed through iterative design review from the Design Review Panel (**DRP**). Notwithstanding, we note that the development of a tower within a precinct comprising multiple heritage items and a historic context can be complementary to a new employment centre for innovation, including significant density and scale. The City of Sydney in the Central Sydney Planning Strategy for instance includes a tower cluster in close proximity to this site, recognising the future desired character of Central Station to include significant density for employment generating purposes.

Specifically, and as noted within the heritage advice prepared by Urbis, change within this location is a characteristic of a developing city during a phase of transformational growth. Historically, Central Railway Station was once one of the most prominent buildings in the city. The Station building is however not a prominent building anymore, even in its immediate context. Notwithstanding, the Station building is still appreciable due to the treatment of the public domain setting.

The same contextual argument can be drawn for other areas of historic significance in Central Sydney, including tower forms in close proximity to the former Lands and Education Buildings on Bridge Street, rejuvenation at Martin Place, and new towers within the backdrop of Sydney Town Hall.

As demonstrated in the analysis undertaken by FJMT, the proposed envelope has the potential to retain the visual prominence of the existing building, and the legibility of its composition, architectural style, form and features. The most significant façades of the building are given prominence by the nominated setback and curtilage controls outlined in the planning envelopes and as supported through the Draft Western Gateway Design Guide.

With regards to the proposed tower setbacks, we note that this was a critical element presented to the DRP with significant analysis and design consideration undertaken by the proponent. Multiple options were considered with varying setbacks from the facades of the former Parcels Post building.

The proposed setback condition, including a chamfered setback to the north west corner of the building, was ultimately supported by the DRP as it was considered that the former Parcels Post building prominence as a heritage item when viewed from Lee Street, Railway Square and Broadway was retained. Further, the provision of this setback from the north west corner of the building balances the required building separation between Block A (Atlassian) and Block C and minimises the southern extension into Henry Deane Plaza to 16m while allowing a minimum viable floorplate size.

Finally, the heritage context of the site reflects a historic functional use of the former Parcels Post building which includes the importance of parcel distribution by rail. The existing building worked in conjunction with the former Inwards Parcels Shed (part of the Atlassian redevelopment) and platforms in the western yard precinct. We note the suggestion that these physical, functional and visual connections are to be retained and interpreted, and not obscured through future development of the sub-precinct. It is noted that this is a requirement of the Draft Western Gateway Design Guide.

View Impacts

Through the development of the proposed planning controls for Block C, the proponent explored a range of tower forms and planning envelopes with considerations on major view lines, microclimate outcomes and impact on surrounding significant heritage items.

The Visual Impact Assessment submitted with the rezoning application demonstrates the prominence of the heritage buildings is maintained through envelope setbacks at the key intersection of Pitt, George, Quay, Broadway and Lee Streets. Additionally, the Urban Design Statement demonstrates that views to the Central Station Clocktower remain visible and are not obstructed by the proposed envelope.

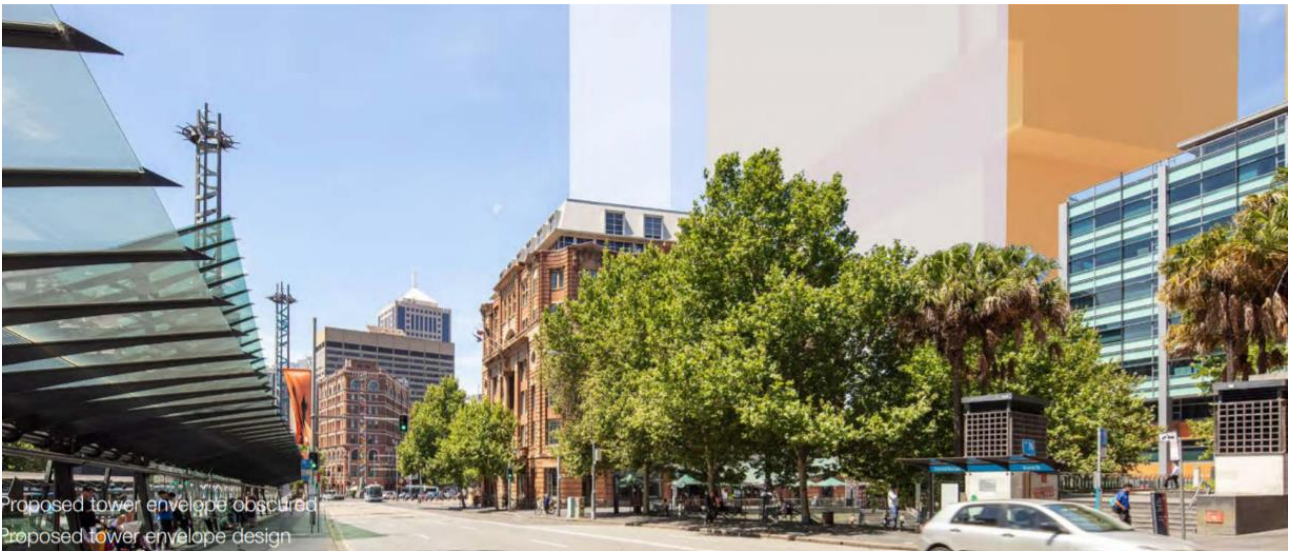
Within the proposed planning envelope, multiple core options have been considered which result in varying view impacts to the facades of the former Parcels Post building from the public domain. As outlined in the FJMT report at **Appendix A**, the planning envelope includes flexibility to allow an eastern core that penetrates the original (rebuilt) eastern façade of the building and/or an eastern core external to the existing building footprint that also requires a core located to the south of the existing building. Each of these core locations could have benefits to either the visibility of the original facades of the building or to the internal fabric of the building. Within the maximum planning envelope these benefits are to be explored by competitors in an Architectural Design Competition to demonstrate improved view impacts compared to the proposed reference scheme.

Figure 1 Visual and View Impacts towards Central Station Clocktower



Picture 1 Views maintained to Central Station Clock Tower from Broadway by virtue of chamfered north western tower setback

Source: FJMT



Picture 2 View from Lee Street demonstrating negligible additional view impact from Block C planning envelope, and demonstrating Central Station Clock Tower view is not obstructed

Source: *Virtual Ideas and Urbis*

The DRP provided direction to the proponent that, where both could not be achieved, the primacy of the Railway Square / Central Station heritage precinct prevails over theoretical views from Devonshire Street. The extension of the planning envelope into Henry Deane Plaza by 16m will provide a filtered view from the future connection the over station development (OSD) stairs to the Marcus Clark building. The developer is committed to exploring opportunities to emphasise and accentuate this connection where possible through the future Architectural Design Competition for the detailed design of the tower. Specifically, it is noted that the Draft Western Gateway Design Guide is proposed to be amended to require development on Block C to:

(g) Include the use of materials or other measures such as transparent materials and void spaces to ensure a significant portion of the original southern facade can be interpreted from the public domain, and that any enclosure adjacent to the original southern façade is limited as much as possible.

As such the proposed planning controls include adequate protections for a future tower to be designed on the site that responds to the heritage context of the sub-precinct, and significant view corridors and vistas without diminishing the ability to contribute to the overarching vision of delivering a new technology and innovation precinct at Central Station and the Western Gateway sub-precinct specifically.

3.1.2. Building Intervention

Structural Intervention

The significance of the building is not characterised by its interiors. Rather the significance of the former Parcels Post building is characterised by its façade and the historic role of the building representing the importance of parcel distribution by rail in Sydney's early European settlement and development. The history of the building design and development is inherently functional, and its interiors are described as historically modest, pedestrian and unremarkable, and it is generally understood that this is by design.

As such, there is no specific interior fabric from which additional structure would detract from the significance of the former Parcels Post building, and the principle of inserted additional elements into the floorplates is considered acceptable from a heritage perspective as outlined in the advice attached at **Appendix B**. Further, the Structural Options Analysis at **Appendix E** demonstrates that the proposed planning envelope facilitates a structural design that strengthens and builds upon the existing structural grid of the building, to enhance the legibility of this feature of the former Parcels Post building.

Further, a study of interventions into highly significant buildings highlights several successful examples which the DPIE and their City of Sydney counterparts have considered appropriate in the past. The major redevelopment of the Education Building on Bridge Street has a number of comparable elements. The building was also designed by George McRae in an Edwardian style however the Education Building is considered to be of a significantly higher design quality, resolution and social significance. This building is

subject to an approved development which includes retention of several key internal spaces, substantial internal demolition, internal modifications a new roof top addition.

As such, while a detailed structural design cannot be known at a rezoning phase the DPIE can be satisfied that a new structural intervention within the building would not adversely impact aspects of the building that make a defining contribution to the success or significance of the building. Further by allowing structural intervention to those areas that make a lesser contribution, future development may allow the reinvigoration of the building to continue to be relevant and play a useful role in the changing, urban landscape.

While preservation of internal structural elements will be achieved where possible, the current former Parcels Post building does not meet current code for seismic or facade thermal performance. Any redevelopment of the property would also bring the heritage building up to current standards.

Notwithstanding, it is noted that structural, wind, and heritage advice has been provided within the rezoning application to guide future development of a new tower on the site as to the most appropriate locations and a potential 'zone' for structure to be identified to ensure that a future structural solution for the proposal does not have an unreasonable or unprecedented impact on the interpretation of the existing building.

As such, the Structural Options Analysis for the proposed planning envelope indicates potential structural zones, with these structural zones focused on minimising and limited structural intrusion into the former Parcel Post building as much as possible. This is demonstrated through an indicative line of structural columns located from the SE to NW of the former Parcels Post building and a potential structural zone on the highly modified eastern façade of the building as identified within the reference design which is identified as not original building fabric and suitable for re-interpretation to facilitate development.

Through the evolution of the proposed planning envelope for Block C options were considered for new buildings on the site that required either different or no structural intervention into the former Parcels Post building. Any option that did not require structural intervention to the former Parcels Post building was not considered acceptable as it would not deliver upon the objectives for the sub-precinct, and/or would adversely impact the wind environment of the precinct or reduce the amount of publicly accessible space in the precinct. Any alternative scenario considered did not deliver the extent of public benefits articulated within the Central Precinct Draft Strategic Vision that the proposed envelope can achieve.

As explored throughout the development of the proposed planning envelopes, it is not feasible to develop a structural solution that cantilevers over the former Parcel Post building without support structure passing through the heritage building. This is addressed in the structural advice attached to this letter (**Appendix E**). Such a requirement to cantilever over the building and prohibit any support structure penetrating the building is however not considered to be necessary by the heritage advisors provided that the retention of a representative area of structure is stipulated and the key façades are given the aforementioned prominence.

Eastern Façade

The Heritage Impact Statement (**HIS**) submitted with the rezoning application acknowledges that the proposed eastern tower core will partly obscure views to the eastern façade of the former Parcels Post building from the Inwards Parcels Shed. The technical heritage advice provided from Urbis specifically notes that the proposed interventions to the building on the highly modified eastern façade are assessed to be acceptable for the following reasons:

- The façade has been extensively altered and no original fabric is discernible except at the northern and southern ends of the facade. Styrofoam filled vinyl embellishments were installed on the east elevation to replicate the appearance of carved sandstone but have been substantially compromised by local birds.
- Notwithstanding, parts of the rebuilt façade will remain partly visible. Specifically, the reference scheme does not obscure the return at the northern end, that which is most visible from Railway Colonnade Drive. This would ensure that the form of the building overall remains legible and retains a connection with the Inward Parcel Shed through a common early character.
- The eastern façade was original a simpler façade and even so has been extensively altered. Specifically, parcel lifts were introduced in c. 1915 and a later extension was constructed c.1969 (and was subsequently removed). The majority of the façade therefore has been modified or reconstructed. Some reconstruction works following the removal of the 1969 addition were undertaken inappropriately and are now failing and notably was dilapidated in 1993 as outlined at **Appendix B**. A number of windows to the east façade have been replaced with aluminium windows. With regard for the extent of change to this façade and the relative level of significance it is appropriate that intervention is concentrated to this façade.

- There is an exciting opportunity in this area between the former Parcels Post building and the Inwards Parcel Shed to facilitate public congregation between the two through public domain improvements which would be supported through the development of the sub precinct generally. This is an improvement on the current utilitarian condition which does not encourage public access (noting that it is privately accessible). Interpretation could be considered in this area to celebrate the historic functional connection between the buildings.

Further it is noted that Principle 4 (Managing Change) of the Conservation Management Strategy submitted with the rezoning application notes that the majority of eastern façade has been modified over time and therefore there is opportunity for intervention in this location, subject to heritage consultation. As such, a future intervention into the existing eastern façade of the former Parcels Post building, to be detailed following completion of an Architectural Design Competition, is anticipated to be acceptable from a heritage perspective.

3.1.3. Curtilage to Former Parcels Post Building

The City of Sydney submission states that the zone between the former Parcels Post building and the base of the tower appears to be enclosed within the reference design. We note the City of Sydney's position that this 'vertical separation zone' should not be fully enclosed. As such we suggest refining the guidance within the 'Draft Western Precinct Design Guide' which relates to this 'vertical separation zone'. Proposed changes to the 'Draft Western Precinct Design Guide' are outlined in Section 4 of this letter. The proposed changes to the Draft Design Guide clarify that the 'vertical separation zone' will allow for structure through this zone, however structure must be minimised within the transition zone to ensure a visual relief between the maximum height of the former Parcels Post building and the new tower is achieved.

No floor space or enclosure other than required for minimum structure and core will be permitted within the vertical separation zone.

In addition to proposed amendments to the Draft Design Guide relating to the 'vertical separation zone', we note that through the evolution of the planning envelope the DRP identified an appropriate curtilage and heritage setback as running from the SE to NW corner of the former Parcels Post building. This setback zone will not be penetrated by structure or any building form, again ensuring the prominence of the former Parcels Post building from key public domain areas and view corridors.

3.2. BUILT FORM

3.2.1. Height, Scale, and Density

Submissions received on the exhibition of the proposed development raised concern regarding the proposed height, scale, and density of development on Block C and the cumulative impact on the sub-precinct.

The proposed density of development on Block C is less than 60% of that proposed on Block A on a comparable site area, and significantly less than the density approved within the planning controls of Block B. While the proposed development is of a lower intensity than its neighbouring buildings it enables significant public benefits to be delivered not only for the site but the broader sub-precinct.

Currently there is limited public access to the former Parcels Post building, and the existing façades require restoration works and any remaining heritage interiors are covered by modern plasterboard. The redevelopment will provide the former Parcels Post building with a new future and provide public access through an exciting new retail precinct exposing the heritage structure to the public. Further, the proposal includes the revitalisation of Henry Deane Plaza within Block C. As such the density proposed on the site is not only less than that proposed throughout the precinct, but it delivers significantly to public benefits delivered across the sub-precinct.

The proposed maximum planning envelope on Block C also results in a slender tower on the site that maintains the existing former Parcels Post building as a prominent feature in the public domain. While the proposed planning envelope has a building height comparable to Block A and Block B, it is noted that the maximum GFA proposed for the site will necessitate a smaller building to be delivered on the site. The envelope however provides flexibility for participants of a future Architectural Design Competition on the site to explore further alternatives for the detailed design of the building that addresses its site context, relationship with the existing former Parcels Post building, and achieves design excellence. It is noted that in addition to a maximum GFA control of 41,000sqm for a tower on the site, the Draft Western Gateway Design Guide also prescribes a maximum 1,300sqm GBA floorplate control for Block C. This floor plate control

further regulates that a tower on the site must be slender, while still meeting the minimum requirements for a PCA A-Grade commercial office building.

The proposed envelope massing has been extensively considered through the DRP process with reference to several factors including the relationship with the former Parcel Post building and other significant heritage items within the Central Precinct.

As outlined within Section 3.1 of this letter, the surrounding context and role of the southern portion of Central Sydney is within a transformational phase. In addition to the rezoning of Block A and B within the Western Gateway sub-precinct in 2020, the City of Sydney has also designated multiple nearby sites for substantial additional height. Further, the DPIE have identified additional height and density as appropriate for OSD within the Central Precinct Draft Strategic Vision.

As such, with this changing urban landscape the proposed planning envelopes and density on Block C is considered contextually appropriate. Further, with the maximum planning envelope and setback controls, in addition to provisions contained within the Draft Western Gateway Design Guide, the resulting built form on Block C will be slender form acting as a foil against the background massing of Block A and Block B.

3.2.2. Building Setbacks and Separation

Submissions received on the proposed rezoning raised concerns regarding the proposed building setbacks and separation between buildings within the sub-precinct.

North and Western Setbacks

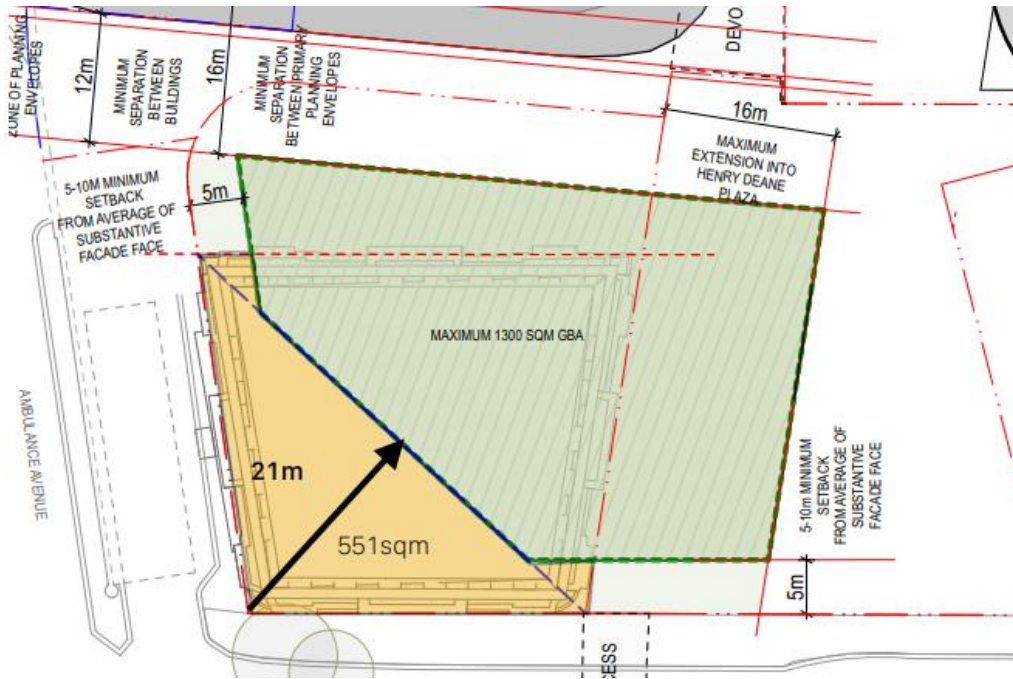
The dimension of a minimum 5-10m setback from both the north and west facades was derived from ensuring sufficient setback area was provided to ensure prominence of the existing building was retained from key public view corridors.

When comparing the proposed setbacks to a 10m setback from the north and west facades without a chamfer (such as if the building were on a corner and subject to the Sydney Development Control Plan 2012 provisions), the setback area is comparable. The proposed setbacks however enable a more usable and logical floor plate that can also provide wind mitigation and maintain view corridors from the site to Central Railway Station.

Further, the proposed setbacks enable the delivery of a floorplate that achieves a 1,300sqm GBA in accordance with the Draft Western Gateway Design Guide provisions for a slender tower with a small degree of flexibility for design variation as part of a future Design Competition. To increase the setbacks on the NE and SW corner while retaining a chamfer would undermine the ability to achieve a PCA A-Grade commercial office floor plate and/or provide any flexibility for future competitors to achieve the required floorplate within the planning envelope.

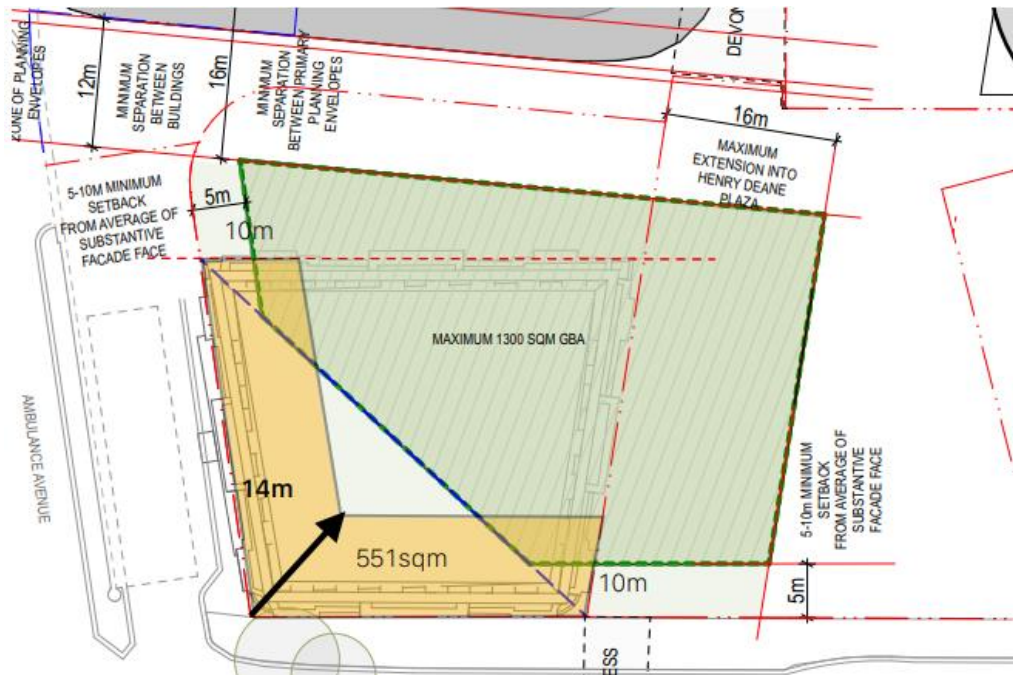
As such it is concluded that the proposed setbacks from the north and western façades are superior to alternatives.

Figure 2 Comparison of setback zones



Picture 3 Proposed setback area

Source: FJMT



Picture 4 DCP compliant 10m setback area

Source: FJMT

Eastern Setback and Building Separation to Block A

A minimum 12m building separation is achieved from the future towers located on Block A and Block C. This is exceeding building setback provisions contained within the existing Sydney Development Control Plan 2012 for commercial office buildings and is comparable with residential and hotel development controls within Central Sydney. Through detailed design visual privacy, and environmental impacts associated with tower forms such as overshadowing and the wind environment will be documented and assessed against the relevant Design Guide criteria.

While this will be articulated through the future development application process, it is noted that the environmental studies provided with the rezoning application demonstrate that any adverse impacts associated with the proposed building separation can be mitigated to an acceptable level through detailed design.

Southern Setback

It is noted that the Consortium Developer of Block B is of the view that any built form landing on Henry Deane Plaza to the south of the former Parcels Post building should be limited to lightweight structural elements only / lightweight columns only (i.e., not building core such as lifts, stairs or services).

TOGA accepts that there may be a range of structural solutions and architectural styles that are viable to support the envelope identified and achieve the shared vision for a redeveloped and reimagined Henry Deane Plaza. At this stage of the rezoning, it is not recommended to limit the structural solution only to the eastern façade of the building, and rather flexibility should be given to participants of the future Architectural Design Competition to determine the most appropriate location for core elements.

Notwithstanding, we note the desire to ensure that pedestrian movement and circulation through the precinct is critical to the future design of Henry Deane Plaza. While the configuration of Henry Deane Plaza will evolve, it is recognised that it will continue to be a crucial functional and visual link between Railway Square and the future OSD. The Draft 'Western Gateway Publicly Accessible Space Strategy' has been prepared with the understanding that a building element to support a tower on Block C will penetrate the privately leased, but publicly accessible land at Henry Deane Plaza and it makes provision to ensure that pedestrian movement and circulation is not undermined by this proposal.

Further, it is proposed to revise the Draft Western Gateway Design Guide to include the use of materials or other measures such as transparent materials and void spaces to ensure a significant portion of the southern façade can be interpreted from the public domain, and that the southern extent of the envelope adjacent to the former Parcels Post building is not to be enclosed, as far as practical.

3.2.3. Floorplate

The proposed floorplate size has been determined by proposing tower setbacks from the north western corner of the former Parcels Post building that ensure the original building presents within the foreground and as a primary building form at the Railway Square intersection. The proposed floorplate was then altered by ensuring an appropriate building separation is achieved between tower forms on Block A and Block C of the Western Gateway sub-precinct. The resulting floorplate was then determined on the southern portion of the façade balancing the need to provide an 8m wide pedestrian thoroughfare through the site (without structure adjacent to the restored southern façade) while providing a zone for additional structure to the south of the building to a maximum distance of 16m (including the 8m pedestrian zone).

As such the resulting floorplate was determined balancing the above factors, in addition to ensuring the resulting floorplate size would support at minimum a PCA A-Grade commercial office building (minimum requirement 1,000sqm Net Lettable Area). The achievement of a PCA A-Grade commercial office building is deemed critical to the success of the building and the broader Western Gateway sub-precinct as outlined below.

The Sydney CBD office market houses local and global corporates, legal/business services, together with federal, state and local governments. A number of corporates including the IT/Technology sectors recognise a Central Sydney location as strategic in order to attract and retain a skilled workforce. As such, new development within Central Sydney should aim to advance the CBD office market, as Australia's largest and deepest office market, to ensure Australian cities remain globally competitive and attractive for a future workforce. This aligns with the key pillar of the City of Sydney Central Sydney Planning Strategy.

The successful creation of an innovative tech precinct at Tech Central will require a diversity of tenancy options to house technology and innovation companies at various stages of growth in addition to housing

supporting services that benefit from the multiplier effect of the innovation sector. REMPLAN analysis indicates that in NSW, the 'internet publishing, broadcast, web search and data server' and 'professional, scientific and technical services' industries create the most demand for supply chain industries for each dollar of output. These industries are likely to be key components of the TechCentral development.

As such, not only does the tenancy strategy for Block C need to anticipate the tenancy demands of potential future tech companies, but also the requirements for more traditional professional services firms. As such the achievement of a minimum PCA A-Grade commercial office building is considered critical to the success of the development. Further, as articulated in the Woods Bagot, SOM, and Hassell Concept Design Report provided with the phase 1 rezoning for the Western Gateway sub-precinct:

"The requirements of the tech tenants are clear:

- Contiguous spaces*
- Vertical connectivity*
- Diversity of space*
- Quality of space*

Tech tenants also require the ability to scale, grow and adapt within a precinct or a building, coupled with these core requirements."

Further, the Colliers Research Report provided with the original phase 1 rezoning for the Western Gateway sub-precinct notes that for flexible office accommodation floor plates should be preferably a minimum of 2,000sqm (uninterrupted). As this size floor plate is not achievable on Block C, it is considered appropriate to ensure that commercial floor plates on Block C can deliver the diversity and of space referred above for future tech tenants, noting that the ability to scale and grow will be available within the precinct if not in the building. Further, to ensure the successful delivery of a commercial building on the site at minimum a PCA A-Grade is appropriate for supporting professional services in this precinct.

As such, the resulting floor plate which can be achieved in accordance with the 'Western Gateway Design Guide' is considered not only small within the context of the precinct and the requirement of tech tenants but is feasible as a PCA A-Grade commercial office building suitable for smaller tech firms looking to grow within the precinct or supporting services benefiting from the multiplier effect of an innovation hub.

3.3. MOVEMENT, ACCESS, AND PUBLIC SPACES

3.3.1. Pedestrian Movement

Pedestrian connectivity at the ground plane is a key consideration for the success of future development not only at Block C but for the broader Western Gateway Sub-Precinct. TOGA is committed to working with TfNSW to achieve the principles outlined within the Draft 'Western Gateway Publicly Accessible Space Strategy' and ensure the expected future pedestrian demand flows are accommodated within publicly accessible areas within the sub-precinct.

It is noted that a key part of the TOGA proposal is enhancing the pedestrian connectivity by providing enhanced connectivity through an expanded north-south pedestrian link. Currently this area has no public pedestrian accessibility. This future link not only connects the precinct and the Devonshire Street Tunnel to the future Western Walkway, but it also provides additional pedestrian connectivity to Sydney's Future Third Square.

As part of the preparation of the rezoning application, TfNSW have been advised by Arcadis regarding the proposed pedestrian network through the Western Gateway sub-precinct. Due to the future convergence of pedestrians travelling to and from the Devonshire Street tunnel, and the western walk entrance at Central Station, a key thoroughfare required to be determined through pedestrian modelling is the narrowest part of the north-south link between Blocks A and C in the sub-precinct. As confirmed by Arcadis a LoS C (interchange) is achievable across the north-south through-site link between Blocks A and C when applying a series of post-development assumptions, scenarios and routes.

Arcadis further recognise that changes to the public realm will impact pedestrian routing decisions, with demands along the north-south through-site link likely to fluctuate over time. However, their assessment is considered to be an evaluation of the 'typical worst case' demand scenario, based on known and unknown

improvements at the time of assessment. Further pedestrian modelling will continue to be undertaken through the finalisation of the publicly accessible space strategy and the final detailed design of the pedestrian network through the site.

3.3.2. Vehicular Movement

Submissions received on the exhibition of the proposed development raised concern regarding the vehicular and pedestrian network surrounding the site. As outlined in the Traffic and Transport Advice prepared by GTA Consultants attached to this letter, a future development submitted in accordance with the planning controls proposed can be appropriately serviced by:

- Vehicular access to the site in both an interim development scenario and an ultimate development scenario (through Block B),
- Service spaces proposed within the shared basement across the sub-precinct,
- Car parking spaces proposed equal to or less than the rates prescribed within the existing Sydney Local Environmental Plan 2012 which apply throughout Central Sydney, and.
- Drop-off spaces within the basement or on-street depending on vehicular types.

TOGA notes that they are committed to working with Atlassian and Dexu/ Frasers to complete cumulative transport modelling for the agreed access arrangements, and to consider any such planned modifications to Lee Street access as part of the future development applications submitted for the sub-precinct.

While such modelling will inform the preparation of detailed development applications, it is noted at this rezoning stage that the Block C Transport Assessment prepared by GTA, has already estimated cumulative traffic generation of the western precinct based on information available at the time and concluded that the modest increase in vehicle trips associated with the precinct is not expected to present a significant impact to traffic in the local area nor the operation of the key surrounding intersections. As such the density proposed within the phase 2 rezoning can be supported, with detailed traffic modelling to be provided in accordance with the Design Guide at the detailed development application stage.

3.3.3. Open Space and Public Domain

Multiple submissions received on the proposed rezoning made comments on the future public domain throughout the sub-precinct. It is again reiterated that the finalisation of the 'Western Gateway Design Guide', in addition to a 'Western Gateway Publicly Accessible Space Strategy', will inform the detailed design of the public domain throughout the sub-precinct. Notwithstanding, it is noted that the proposed planning envelope will influence the final geometry and area of the public domain across the sub-precinct. As such, this section responds to notable comments regarding the planning envelope and its potential impact on the public domain.

The City of Sydney raised concern regarding the establishment of a public domain level set at RL21. The comment speculated that the purpose of the RL level nominated was to ensure lower ground retail was feasible on the site. This is not the driver of the ground level RL. The purpose of the RL21 level has been well documented and discussed throughout the DRP meetings. Its purpose is not to increase floor area but rather to deliver more appropriate and improved pedestrian connections across the sub-precinct and precinct more broadly.

The intention and design of the future public squares to the north and the west (potentially involving road closures) remains unresolved. With TfNSW developing both these squares, TOGA is committed to working with TfNSW to ensure planning is coordinated and the final design is seamless.

Additional detailed design inclusive of landscaping treatments will be addressed as part of any future development application submission. Further, it is noted that any future development application will be required to satisfy the Public Realm Principles included with the 'Western Gateway Publicly Accessible Space Strategy'.

3.4. AMENITY

3.4.1. Overshadowing

Submissions received on the public exhibition of the stage 2 rezoning noted that the proposal should ensure that Prince Alfred Park is not overshadowed by the development. The proposal achieves this requirement. Refer to the Shadow Studies and analysis included within the Urban Design Report.

The scale and height of Block A and B has already been confirmed via rezoning completed during 2020. The height of Block C is consistent with Block A and B, defined by the Sun Access Plane. Block C has a reduced maximum floor plate size compared with Block A and B, and therefore its scale is moderated relative to these neighbours.

3.4.2. Wind

The City of Sydney in their submission notably include comments regarding the future wind environment of the sub-precinct and have suggested wind criteria to be established for future development on the site to be assessed against.

In response to comments regarding the methodology of the wind modelling conducted for Block C it is noted that computational modelling and wind tunnel testing was undertaken to refine the proposed planning envelope as well as the most appropriate positioning of the tower setbacks on Block C. Modelling during this process was based on the available massing models at the time for Block A and Block B developments. This ensured that modelling and conclusions were comparing like-for-like with wind reports prepared for the broader Western Gateway sub-precinct.

Since the preparation of the rezoning application, development applications have been submitted to the DPIE and the City of Sydney for the comprehensive redevelopment of Blocks A and B respectively. This has enabled additional wind testing to be completed by RWDI (the same consultant for all three Blocks within the precinct) based on the latest detailed designs for Blocks A and B. The results of this revised assessment is summarised at **Appendix C**.

The City's submission highlights six locations, in three general areas, where the inclusion of the Block C reference design may have previously resulted in wind conditions increasing within the sub-precinct. Locations noted to require wind mitigation in association with Block C, were generally in the nexus of the three blocks of the sub-precinct. It was therefore acknowledged that conditions in this area will need to be managed through the detailed design process and collaboration of the three blocks.

Since the completion of the updated modelling for the latest sub-precinct development composition, the inclusion of the reference design for Block C results in similar wind conditions than without the inclusion of the Block C reference design. One location in the future square to the north of the site will notably have improved wind conditions (from standing to sitting conditions) as a result of the proposed reference design, while two locations to the north of the site are noted to improve such that they will satisfy the safety criterion.

South of the proposed building, four locations within Henry Dean Plaza are noted to become slightly windier, however the modelling demonstrates that they will meet the walking criteria, as required by the Draft Wind Comfort Map for the precinct. Two locations in Henry Dean Plaza are expected to exceed the safety limit criteria based on the inclusion of the reference design, notably without the inclusion of any wind mitigation measures. Following inclusion of refinements to the building design expected following the Design Competition (such as built form articulation, and finalised design of the Pavilion Structure) the redirected southerly winds impacting these two locations above the safety limit are anticipated to be mitigated.

It is noted that the Western Gateway Design Guide will include the DPIE agreed wind criteria, to be addressed in any future development application for the site. As stated at **Appendix C**, at this stage in the planning process, the rezoning application has demonstrated that this criterion can generally be achieved within the proposed planning envelopes, however further mitigation will be required for two locations in the detailed development application.

3.4.3. Visual and View Impacts

Submissions received on the stage 2 rezoning application also comments on the impact of the proposed tower on the visual impact of a new building on the site and impacts to view corridors. View impacts associated with the proposal have been addressed in the context of recessed building setbacks and

separation at Section 3.2 of this letter, and through a discussion on the heritage context of the site at Section 3.1.

The proposal seeks to retain views and vistas where appropriate and achieves this through the horizontal and vertical ('vertical separation zone' setbacks identified by the DRP. Furthermore, the proposal takes into consideration the rezoning and proposed redevelopment of Block A and B, to this extent it should be noted that district views of the proposed tower on Block C will be read in the context of the broader Western Gateway sub-precinct, and future OSD at Central Railway Station.

The key views as nominated within the Central Sydney Planning Strategy as well as additional views from Railway Square and Lee Street are included within the Visual Impact Assessment included within the rezoning package. The Urban Design Report also includes additional imagery illustrating how the envelope and reference massing service the preserve the primacy of the heritage building at the key intersection of Lee St, Pitt St, George St, Quay St and Broadway. Further opportunities to increase views to the southern façade are identified within the response provided by FJMT at **Appendix A**, to be explored through the Design Competition.

A further view and visual impact analysis will be provided as part of any future development application required for the redevelopment of the site.

3.5. SUSTAINABILITY

TOGA's ambition is to design and deliver a highly efficient, green building that will stand to test of time and be a market leader for years to come. TOGA's commitment is in line with the performance requirements outlined in the 'Western Gateway Design Guide'.

The proposed stage 2 rezoning package outlines the performance standard Green Star Design & As-Built v1.2. Following the completion of an Architectural Design Competition the developer can articulate the proposed solution for achieving its target of 6 Star Green Star rating in greater detail.

As such the proposal incorporates strong ESD measures, which allows for high levels of sustainable development despite the fact that precinct based ESD measures are not adopted within the current planning framework affecting the site.

3.6. OTHER MATTERS

it is acknowledged that COVID19 pandemic has had a major impact on the way we work. However, it is important that NSW continues to plan for the return to economic growth as the recovery progresses and widespread vaccination of the population is achieved. Sydney is a major global commercial centre, and it is important that a technology hub is established to attract and retaining the best and most skilled tech- talent. The development of Block C at the Western Gateway Sub-Precinct will contribute to the achievement of this objective at Central Station.

The post COVID19 world will be a key consideration of any future building design which would form part of a development application. It is expected that such design attributes for new hotel and commercial office developments will include targets for additional ventilation, access to outdoor spaces, access to spaces with greenery, and the integration of hygiene focused safety features such as automated doors to reduced the risk of virus transfer. Going beyond design, post completion the building operations will follow global best practise in regard to health and hygiene.

4. PROPOSED CHANGES TO DESIGN GUIDE

In response to submissions received on the rezoning application, and the receipt of subsequent feedback from the Project Review Panel, changes are proposed to the Draft Western Gateway Design Guide to inform future development applications for the site.

It is noted that the proposed amendments to the Design Guide outlined below are proposed to be made to the latest version (v4) dated May 2021. This version of the Design Guide has been updated since the lodgement of the phase 2 rezoning for Block C as part of the separate parallel finalisation process associated with the phase 1 rezoning for Blocks A and B of the Western Gateway sub-precinct.

Section 3.1.2 Building massing and envelope

(10) Built form on Block C is to be in accordance with Figures 3, 4, 6 and 7 relating to building separation and setback distances and is to:

a. comprise a single tower form with a maximum floorplate gross building area of 1,300sqm **that must be wholly contained within the planning envelopes illustrated at Figures 3, 4, 6 and 7, noting that flexibility is provided within the planning envelopes to enable variation in a design excellence process,**

(...)

f. provide a vertical separation zone between the underside of the tower and the topmost point of the reinstated **double** pitched roof to the Parcels Post Office Building **which:**

~~i. have a minimum vertical separation of 12m~~

~~ii. be setback from the western and northern tower facades, in order to minimise structural encroachment~~

i. allows a minimum vertical separation of 12.6m

ii. achieves a clear separation that safeguards the visual prominence and hierarchical importance of the former Parcels Post building

iii. does not comprise building enclosures other than necessary structural elements to support any vertical addition to the former Parcels Post building

iv. does not have a detrimental visual impact, when seen from the public domain, from structural elements on the heritage setbacks.

g. be designed to ensure any vertical addition to the former Parcels Post building must demonstrate an innovative structural solution to ensure that there is minimal structural encroachment within the vertical separation zone, and minimal structural encroachment to heritage fabric of the former Parcel Post building'

h. comprise no more than 41,000sqm gross floor area within the tower envelope on Block C (including the former Parcels Post building).

i. include below ground gross floor area within Henry Deane Plaza to activate the multiple pedestrian links and lower ground level. Any gross floor area delivered below ground level within Henry Deane Plaza must not result in an exceedance of a total 43,000sqm gross floor area on Block C as defined by the Sydney Local Environmental Plan 2012.

Further, it is noted that the developer would accept the following suggested changes to the Design Guide recommended by Heritage NSW, however as amended by red, bolded, strike-through text which is not considered necessary or reasonable given the extent of changes to the precinct anticipated by the Western Gateway sub-precinct controls.

Heritage NSW Proposed	Developer Response	Comment
<p>2.1 Desired future character The Western Gateway sub-precinct will:</p> <p>(a) Create a new and exciting ‘destination’ at the southern end of Central Sydney</p> <p>(b) Form an important sub-precinct to the broader Central Precinct, including an entrance to the planned future Over Station Development</p> <p>....</p> <p>(h) Be characterised by a built form that embraces and celebrates the area’s historical significance, responds sympathetically to the existing visual, spatial, and physical character of the place and enables the retention and adaptive re-use of key heritage items.</p> <p>....</p> <p>(n) Embeds the Aboriginal and Non-Aboriginal historical and cultural values of the place (including intangible values) in a holistic and integrated way through a Heritage Interpretation strategy for the entire precinct identifying key themes, stories, social values, interpretive opportunities, measures and locations as an integral component of creating a unique and exciting destination. To assist with this task, the project team are encouraged to reference the GANSW ‘Connecting with Country’ framework released November 2020.</p>	<p>2.1 Desired future character The Western Gateway sub-precinct will:</p> <p>(a) Create a new and exciting ‘destination’ at the southern end of Central Sydney</p> <p>(b) Form an important sub-precinct to the broader Central Precinct, including an entrance to the planned future Over Station Development</p> <p>....</p> <p>(h) Be characterised by a built form that embraces and celebrates the area’s historical significance, responds sympathetically to the existing visual, spatial, and physical character of the place and enables the retention and adaptive re-use of key heritage items.</p> <p>....</p> <p>(n) Embeds the Aboriginal and Non-Aboriginal historical and cultural values of the place (including intangible values) in a holistic and integrated way through a Heritage Interpretation strategy for the entire precinct identifying key themes, stories, social values, interpretive opportunities, measures and locations as an integral component of creating a unique and exciting destination.</p>	<p>The existing visual, spatial and physical character of the place is changing significantly as a result of the proposed changes to the Central Precinct and the CBD more broadly. Assessment against a point in time ‘existing’ context is not considered appropriate in this changing, and dynamic context.</p> <p>The Developer for Block C agrees with this suggestion; however it is noted that the proposed development for Blocks A and B affected by the Draft Guide may be impacted by this proposed change.</p> <p>Additional consultation requirements are proposed at section 3.2.1 in accordance with the response to the PRP comments.</p>

Heritage NSW Proposed	Developer Response	Comment
<p>3.2.1 Heritage Objectives</p> <p>(a) Development should demonstrate an understanding of, and appropriately respond to the visual, physical and spatial character of the place including items of heritage significance within the sub-precinct (and the broader Central Precinct) and ensure items of heritage significance and their heritage values (including intangible values) are maintained and celebrated to create a unique and exciting destination wherever possible.</p> <p>(b) Development should retain and re-use any assessed heritage significant heritage items, features, specific spaces and fabric of significance.</p> <p>(c) Development should enable the sensitive adaptive re-use of any assessed heritage significant heritage items, features, specific spaces and fabric of significance.</p> <p>(d) Development should respect as much as practicable the context, character and setting of heritage items, including connections with surrounding items, views and vistas.</p>	<p>3.2.1 Heritage Objectives</p> <p>(a) Development should demonstrate an understanding of, and appropriately respond to the visual, physical and spatial character of the place including items of heritage significance within the sub-precinct (and the broader Central Precinct) and ensure items of heritage significance and their heritage values (including intangible values) are maintained and celebrated to create a unique and exciting destination wherever possible.</p> <p>(b) Development should retain and re-use any assessed heritage significant heritage items, features, specific spaces and fabric of significance.</p> <p>(c) Development should enable the sensitive adaptive re-use of any assessed heritage significant heritage items, features, specific spaces and fabric of significance.</p> <p>(d) Development should respect as much as practicable the context, character and setting of heritage items, including connections with surrounding items, views and vistas.</p>	<p>Suggestions to (a), (b) and (c) all accepted.</p> <p>As per the comment on the existing character of the place, the introduction of this objective places significant weight on the existing context, character and setting of the heritage item. Given the significantly changing nature of the precinct, this inclusion of this objective may undermine the achievement of the broader sub-precinct objectives.</p>
<p>3.2.1 Heritage Design guidance</p> <p>(1) A Statement of Heritage Impact is to accompany any future DA for new buildings within the sub-precinct and is to be prepared in accordance with the NSW Heritage Manual 'Statement of Heritage Impact.' It should demonstrate an understanding of the heritage and cultural values of the place and include consideration of the Western Gateway sub-precinct as a whole, and the wider Central Precinct.</p>	<p>3.2.1 Heritage Design guidance</p> <p>(1) A Statement of Heritage Impact is to accompany any future DA for new buildings within the sub-precinct and is to be prepared in accordance with the NSW Heritage Manual 'Statement of Heritage Impact.' It should demonstrate an understanding of the heritage and cultural values of the place and include consideration of the Western Gateway sub-precinct as a whole, and the wider Central Precinct.</p>	<p>Suggestions to (1) all accepted.</p>

Heritage NSW Proposed	Developer Response	Comment
<p>(2) Any future DA for new buildings within the sub-precinct is to be accompanied by an integrated Western Gateway sub-precinct Heritage Interpretation Strategy (co-ordinated with across the entire Central Precinct), that identifies opportunities for the presentation of the history of the site and surrounds. It is recommended that a program of Aboriginal ceremony be developed to re-awaken the landscape as part of the proposal. This should include Aboriginal and non-Aboriginal themes such as living cultural practices, stories (including Stolen generation stories) , social values, interpretive opportunities, measures and locations and present the findings of any desktop analysis of the likely archaeological significance of the site and the immediate surrounds. All documentation should be prepared in accordance with Interpreting Heritage Places and Items Guidelines.</p>	<p>(2) Any future DA for new buildings within the sub-precinct is to be accompanied by an integrated Western Gateway sub-precinct Heritage Interpretation Strategy (co-ordinated with across the entire Central Precinct), that identifies opportunities for the presentation of the history of the site and surrounds. It is recommended that a program of Aboriginal ceremony be developed to re-awaken the landscape as part of the proposal. This should include Aboriginal and non-Aboriginal themes such as living cultural practices, stories (including Stolen generation stories), social values, interpretive opportunities, measures and locations and present the findings of any desktop analysis of the likely archaeological significance of the site and the immediate surrounds. All documentation should be prepared in accordance with Interpreting Heritage Places and Items Guidelines.</p>	<p>These opportunities can be considered as part of future engagement with GANSW and the City of Sydney Aboriginal and Torres Strait Islander Group when implementing principles for action from the Connecting with Country Framework (refer proposed new requirement in section 3.2.1(8)).</p>
<p>(3) Development should comprise of building forms and design treatments that give consideration and positively responds to heritage items within and immediately surrounding the sub-precinct with specific consideration to the bulk, height and scale of the existing significant elements of the site, including its setting, context, streetscape, and visual and physical character of the locality. The Statement of Heritage Impact that accompanies a development application should identify and assess any direct and/ or indirect impacts (including cumulative impacts) to the heritage significance of the buildings and elements within the precinct. It should also provide an understanding of the place's heritage values and assess opportunities that arise from these.</p>	<p>(3) Development should comprise of building forms and design treatments that give consideration and positively responds to heritage items within and immediately surrounding the sub-precinct with specific consideration to the bulk, height and scale of the existing significant elements of the site, including its setting, context, streetscape, and visual and physical character of the locality. The Statement of Heritage Impact that accompanies a development application should identify and assess any direct and/ or indirect impacts (including cumulative impacts) to the heritage significance of the buildings and elements within the precinct. It should also provide an understanding of the place's heritage values and assess opportunities that arise from these.</p>	<p>As stated in earlier comments, the weight of existing context and character it problematic given the evolving nature of the precinct.</p> <p>Agreed.</p>
<p>(4) Buildings should be constructed of durable and robust materials.</p>	<p>(4) Buildings should be constructed of durable and robust materials.</p>	<p>While the Developer for Block C would accept the deletion of this provision, it is understood that this provision is proposed to be retained in the</p>

Heritage NSW Proposed	Developer Response	Comment
		Design Guide by TfNSW.
(5) Architectural detailing should provide a higher order of priority to the levels interfacing with the heritage items and adjacent public domain. <i>It should take an informed and strategic approach to form, colour, materials, and details and respond to the immediate context and character.</i>	(5) Architectural detailing should provide a higher order of priority to the levels interfacing with the heritage items and adjacent public domain. <i>It should take an informed and strategic approach to form, colour, materials, and details and respond to the immediate context and character.</i>	Suggestions to (5) all accepted.
(6) Development on Block A is to	Unrelated to this application.	N/A
(7) Development on Block B is to	Unrelated to this application.	N/A

In addition to the revisions to the Design Guide suggested by Heritage NSW as amended in the table above, additional provisions are proposed to be added to the Design Guidance part of Section 3.2.1 to respond to other feedback received during the exhibition of the Rezoning Application as follows.

(8) Development on Block C is to:

(a) Incorporate an innovative structural response to minimise the impact of structural intrusion on significant heritage elements of the former Parcels Post building, and enhance legibility of significant heritage facades (for clarity this does not include the highly modified eastern façade).

~~(a)~~ **(b) Include a minimum 12.6m vertical separation zone (excluding lift cores and structural zones) that minimises structural elements** between the topmost point of the original roof form of the former Parcels Post building and the lowest point of the underside of the tower above as shown in Figure 7: Separation Distances and Setbacks.

~~(b)~~ **(c) Treatment of tower cores and lobbies adjacent to the heritage item are to have regard for the symmetry of the principal western façade, to ensure the original form and facades remain able to be interpreted and to minimise intervention to the primary northern, western and southern facades.**

~~(c)~~ **(d) Vertical circulation to access the upper floor plates above the former Parcels Post building is to be positioned to the southern or eastern extent of the planning envelope, unless an alternative arrangement that minimises adverse impacts to the significant heritage fabric can be demonstrated to the satisfaction of the consent authority.**

~~(d)~~ **(e) Future development is to address the recommendations of a site-specific precinct-wide Conservation Management Plan (CMP), the preparation of which needs to be informed by Heritage NSW. The precinct-wide CMP is to include an initial specific focus on the Western Gateway Sub-Precinct but is to be prepared to be updated over time to incorporate future planning for the rest of the Central Precinct in the long term.**

~~(e)~~ **(f) Future development is to increase ground level public access to the existing former Parcels Post building.**

(g) Include the use of materials or other measures such as transparent materials and void spaces to ensure a significant portion of the original southern facade can be interpreted from the public domain, and that any enclosure adjacent to the original southern façade is limited as much as possible.

(h) Prior to the lodgement of a development application that includes the comprehensive development of Block C, the applicant must engage with the City of Sydney's Aboriginal and Torres Strait Advisory Group and GANSW.

(i) Prior to the lodgement of a development application that includes the comprehensive development of Block C, the applicant must engage with the NSW Heritage Council.

5. CONCLUSION

We appreciate the opportunity to provide a response to the recent public exhibition of the draft planning controls for this important precinct.

The restoration of the heritage-listed hotel building, the former Parcels Post building, on the site and the delivery of new commercial and hotel floorspace and public domain improvements across the Central Precinct will collectively deliver the Government's vision for an iconic technology precinct and transport gateway.

The proposed controls relevant to Block C within the Draft Western Gateway Design Guide will regulate the future tower and built form on the site to minimise impacts to significant heritage fabric on the site, deliver appropriate building separation, preserve important view corridors, retain the prevalence of the heritage item in the public domain, and deliver a viable commercial office floor plate that can contribute to the desired future character of the Western Gateway sub-precinct.

New diverse public spaces delivered in the sub-precinct, importantly including on Block C, will connect the city and improved pedestrian connectivity will provide efficient modal changes aligned with NSW transport objectives. We trust that the above information assists with the finalisation of these controls, which will allow the opportunity for proponents within the Western Gateway sub-precinct to proceed to lodging development applications to realise the vision and deliver significant public benefits to the City.

DISCLAIMER

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A

**URBAN DESIGN AND ARCHITECTURAL
RESPONSE PREPARED BY FJMT**

APPENDIX B

**HERITAGE ASSESSMENT PREPARED
BY URBIS**

APPENDIX C

**PEDESTRIAN WIND COMFORT
ASSESSMENT PREPARED BY RWDI**

APPENDIX D

TRAFFIC AND TRANSPORT RESPONSE TO SUBMISSIONS LETTER PREPARED BY GTA CONSULTANTS

APPENDIX E

**STRUCTURAL OPTIONS ANALYSIS
PREPARED BY ROBERT BIRD GROUP**

