

Central SSP - Agency submissions

This document contains the below submissions received from agencies during exhibition of the Central State Significant Precinct rezoning proposal.

Note: the Department has published all non-confidential submissions received during exhibition of Central SSP rezoning proposal. Submissions that requested confidentiality have not been published.

Agency name	Page no.
Airservices Australia	2
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From: Airport Developments <[REDACTED]>
Sent: Thursday, 15 September 2022 3:13 PM
To: Emily Dickson [REDACTED]
Subject: RE: Notice of Exhibition - Central State Significant Precinct

OFFICIAL

Hi Adrian,

Airservices have no specific comments to make on rezoning proposals or any aspect of this proposed redevelopment.

All subsequent developments proposed to be built as part of this project, or cranes required during construction, could possibly be subject to change before construction is planned to commence and therefore, we recommend that all development/ crane operations are run through the usual Airport (Protection of Airspace) Regulations 1996 (APARs) assessment process. Noting the proximity to Sydney Airport, we recommend that any future assessment applications are forwarded on to the airport in the first instance for them to conduct their own assessment. The airport will then refer the proposal to us if required as per the APARs.

If you have any further queries, please let me know.

Kind regards,

Richard Tomlinson
Airport Development & Engagement Advisor
w: [REDACTED]

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Notice of Exhibition - Central State Significant Precinct
Date: Monday, 26 September 2022 2:35:53 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

OFFICIAL

Hi Emily,

It is not usual practice for Airservices to provide a detailed assessment of proposals at this stage given all developments/ crane operations still must run through the usual *Airport (Protection of Airspace) Regulations 1996 (APARs)* assessment process - which protects the airspace around Sydney, including the RTCC.

However, to cover off your below queries, Airservices view is that no developments or crane operations should be planned to exceed the current prescribed airspace levels around Sydney, including the RTCC, as we would not be supportive. Temporary exceedance for a period not greater than 3 months will considered by the department on a case-by-case basis, based on advice from Airservices, CASA and the Airport/ operators there.

If you have any further queries, please let me know.

Kind regards,

Richard Tomlinson

Airport Development & Engagement Advisor

w: [REDACTED]

From: [REDACTED]
To: [REDACTED]
Subject: RE: Notice of Exhibition - Central State Significant Precinct [SEC=OFFICIAL]
Date: Friday, 2 September 2022 4:31:25 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

OFFICIAL

F22/17879-17

Attention: Emily Dickson
Senior Planning Officer, Metro East & South (City)

I couldn't find the case on the Planning Portal.

CASA has reviewed the Central Precinct Renewal Program State Significant Precinct Study—Aeronautical Report of July 2022 (Appendix 29).

CASA is in broad agreement with the Aeronautical Report and has no objections to the proposal. The heights of the proposed buildings (up to 164.3m above AHD for A1) are not expected to be an issue.

For example: CASA has assessed under the *Airports (Protection of Airspace) Regulations 1996* the following two proposed buildings in the Western Gateway sub-Precinct:

2 and 8A Lee Street Haymarket at a height of 206.28 m above Australian Height Datum in August 2022.

14 - 30 Lee Street Haymarket at a height of 171 m above Australian Height Datum in May 2021.

CASA is prepared to assess buildings and cranes on a case-by-case basis under the *Airports (Protection of Airspace) Regulations 1996* on receipt of Invitations to Comment (including details) from Sydney Airport at the appropriate stage when the heights are finalised.

Regards

David Alder

Aerodrome Engineer

Aerodrome Developments and Airspace Protection

Air Navigation, Airspace and Aerodromes Branch

p: [REDACTED] **m:** [REDACTED]
16 Furzer Street, Phillip ACT 2606
GPO Box 2005, Canberra ACT 2601

www.casa.gov.au



From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Notice of Exhibition - Central State Significant Precinct [SEC=OFFICIAL]
Date: Wednesday, 14 September 2022 3:59:29 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

OFFICIAL

F22/17879-17

Emily

Good Pick up.

I have now reviewed the relevant sections of the Planning Report (pages 54, 55, 168 and 169 I believe).

I would like to rescind our advice that CASA has no objections to the proposal.

The Planning Report page 54 advises that

"To ensure the operation of Sydney Airport is not compromised by any proposed development that penetrates the RTCC and OLS surface heights, Clause 7.16 of the SLEP 2012 and a proposed site-specific provision will require consultation and confirmation from the relevant airspace authority and Commonwealth body that there is no objection to exceeding the prescribed airspace of the RTCC and/or the OLS."

CASA is not the relevant 'airspace authority'. The primary RTCC surfaces stakeholder is Airservices Australia. The RTCC surfaces are managed by (and used by) Airservices (Cc to this email). Also, my (limited) understanding is that the Department of Infrastructure, Transport, Regional Development, Communications and the Arts may need to endorse RTCC changes in the Sydney area; and that CASA and Sydney Airport may be requested to comment. Airservices would be able to confirm the process.

CASA comments on RTCC surfaces and changes would normally reflect Airservices' assessment.

Regards

[David Alder](#)

Aerodrome Engineer

Aerodrome Developments and Airspace Protection

Air Navigation, Airspace and Aerodromes Branch

p: [REDACTED] **m:** [REDACTED]
16 Furzer Street, Phillip ACT 2606
GPO Box 2005, Canberra ACT 2601

www.casa.gov.au



Department of Planning and Environment

Our ref: DOC22/898797

Emily Dickson
Senior Planning Officer
Metro East and South (City) - Planning and Land Use Strategy Division
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

27 October 2022

Subject: Request for agency advice – Central State Significant Precinct re-zoning

Dear Ms Dickson,

Thank you for the email of 9 October 2022 requesting advice for this planning proposal. Environment and Heritage Group (EHG) has reviewed:

- *State Significant Precinct Study - Central State Significant Precinct*, undated (the precinct study)
- *Explanation of Intended Effect - Central State Significant Precinct*, dated August 2022 (the planning report)
- *Design Guide Central Precinct - State Significant Precinct*, dated July 2022 (the design guide).
- *Central Precinct Renewal Program - Green Infrastructure Strategy*, dated July 2022 (the green infrastructure strategy)
- *Central Precinct Renewal Program - Water Quality, Flooding and Stormwater Report*, dated July 2022 (the flood assessment).

Biodiversity

EHG reviewed the Green Infrastructure Strategy (the Strategy) and supports the measures set out in the Strategy to enhance urban biodiversity through redevelopment of the Central Precinct.

The Strategy states that Eastern Suburbs Banksia Scrub would have traditionally grown throughout the Central Precinct area. However, EHG considers that the vegetation community that would have originally occurred on the subject site was Sydney Turpentine-Ironbark Forest, as indicated by the [Trees Near Me](#) application (hyperlink included). EHG recommends that local provenance native species should be sourced for landscaping.

EHG notes that the ecological assessment (Appendix 3 of the Strategy) states that further impact assessment will be required for several bat species with potential to occur on site including *Micronomus norfolkensis*, *Miniopterus australis*, *Miniopterus orianae oceanensis*, *Myotis macropus*, *Pteropus poliocephalus*, *Saccolaimus flaviventris* and *Scoteanax rueppellii*.

The Design Guide needs to include the requirement that development applications are to be accompanied by a report detailing this further impact assessment. If microbats are found, the 'Biodiversity Management Plan' will also need to include measures to minimise impacts from the proposal to roosting microbats. The Design Guide should be amended to include this requirement.

Department of Planning and Environment

EHG agrees that the presence of native microbat species within the subject land provides an opportunity to expand these populations and their habitat through the retention of existing habitat features and the provision of new roosting structures.

EHG agrees that terrestrial habitat connectivity is currently limited in the vicinity of the precinct, but that an opportunity exists to create linkages from within to outside the sub-precincts. As shown the *City of Sydney Urban Ecology Strategic Action Plan* (City of Sydney 2014), the railway corridor could provide a potential habitat linkage.

Flooding

In reviewing the flood assessment and planning report EHG could not identify any mention or consideration of the *Minister's Local Planning Direction 4.1 – Flooding* (planning direction). The proposal is inconsistent with the direction, for example the rezoning of land within the flood planning area and increases to development intensity.

Impacts on emergency services are also possible and EHG recommends that the NSW State Emergency Services be consulted. For example, it appears that the Prince Alfred Sidings sub-precinct is flood affected and would become isolated by floodwater. To assess the inconsistencies with the direction, risks associated with flood emergency management must be considered at the rezoning stage, and not deferred as suggested in the report. While a flood risk and impact assessment may be provided to support inconsistencies with the direction, EHG considers that the flood modelling report provided does not yet constitute a flood risk and impact assessment.

EHG agrees that the current flood modelling is the first round of modelling that will be refined through later stages and that the level of detail and information inputted to the model is suitable for this stage. EHG would not require an update from Annual Rainfall and Runoff (ARR) 1987 to ARR 2019 for future assessments. EHG does recommends that the modelling of climate change is done in accordance with the appropriate ARR and EHG's guide *Incorporating Australian Rainfall and Runoff 2016* into studies.

EHG does not support the progression of the planning proposal further through the approvals process with the extent and degree of flood impacts shown. Some examples of concern are:

- Flood level increases to already flooded areas on George Street and Regent Street.
- Increases in flooding of the Chalmers Street station entrance.
- Large areas that would be newly flooded or have significant flood impacts e.g., Harris Street.
- Basement car park entries that have the PMF level increased.

The proponent must provide proof of concept for flood mitigation measures to reduce the flood impacts predicted. Currently, the planning proposal only provides a list of possible mitigation options.

Department of Planning and Environment

EHG also notes that the flood assessment - Figure 8-4 appears to show the probable maximum flood impacts but is annotated as the 1% annual exceedance probability, which should be clarified.

If you have any queries please contact David Way, Senior Conservation Officer via

████████████████████ or ██████████

Yours sincerely,

A handwritten signature in black ink that reads "S. Harrison".

Susan Harrison
Senior Team Leader
Greater Sydney Branch
Biodiversity and Conservation

Department of Planning and Environment
4 Parramatta Square, 12 Darcy St
PARRAMATTA NSW 2150

To whom it may concern

Thank you for providing the NSW Environment Protection Authority (EPA) with the opportunity to comment on the Central State Significant Precinct (Precinct) rezoning proposal (Rezoning Proposal), which is currently on public exhibition until 19 September 2022.

The Rezoning Proposal envisages increased commercial, hotel, education, residential, recreation and community spaces, with over station development proposed, while retaining existing railway and associated uses in the Precinct.

The EPA's detailed comments regarding the Rezoning Proposal are provided at **Annexure A** to this brief.

If you have any further questions about this matter, please contact Lauren Musgrave, Strategic Planning Unit, on [REDACTED] or at [REDACTED].

Kind Regards,

A handwritten signature in black ink, reading 'J Hillis'. The signature is written in a cursive, flowing style.

Justin Hillis
A/Unit Head, Strategic Planning Unit
16/9/2022

Annexure A

Contamination

On 10 July 2020, EPA wrote to DPE, in response to DPE's invitation to comment on draft Precinct Study Requirements (Requirements), requesting that pollution assessments include a consideration of contamination issues and that the following words be included in the Requirements:

Conduct investigations to assess whether the development or changes of land use are impacted by contamination. If contamination is identified, identify the appropriate contamination remediation, mitigation and management measures that are required to safeguard the environment and people during construction and use of the proposed development.

Any site investigations undertaken, and the subsequent report/s, must be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the Contaminated Land Management Act 1997 (CLM Act).

The reports must be prepared by consultants certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme.

The processes outlined in State Environmental Planning Policy 55 - Remediation of Land (SEPP55), to assess the suitability of the land and any remediation required in relation to the proposed use must be followed."

To provide increased certainty to the Department, the EPA recommends that DPIE consider a requirement to engage a NSW EPA-accredited Site Auditor to certify the suitability of the land for the proposed use. For example, if:

- an area is to be developed for more sensitive land use; and, if*
- based on further site investigations and guidelines made or approved under section 105 of the CLM Act, it is determined that ongoing management of soil or groundwater contamination is required.*

It doesn't appear that these comments, or any wording regarding contamination, were incorporated into the final Requirements. Additionally, it is unclear whether contamination investigations have been performed by Transport for NSW to date. There does not appear to be any consideration of legacy contaminants in the Rezoning Proposal or supporting technical documents.

The EPA seeks clarification as to whether these investigations have been completed. The EPA would welcome discussions with DPE and the proponent regarding adequate investigation and remediation processes to determine the presence of legacy contaminants in the Precinct.

Noise

The *Central Precinct Renewal Program Noise and Vibration Assessment* identifies several noise sources which may impact on sensitive receivers in the Precinct resulting from the Rezoning Proposal, including construction, rail activities, road traffic and an increased night-time economy.

The EPA considers that the possible adverse noise impacts of increased night-time economy in the Precinct should be considered further in the Rezoning Proposal. In particular, the EPA recommends that any proposed changes to *State Environmental Planning Policy (Exempt and Complying Development Codes) 2008* to enable public events to be undertaken as exempt development, and related provisions in the *Design Guide*, should consider potential adverse noise impacts on nearby sensitive receivers, including future sensitive receivers, from this development.

Air quality

The primary potential source of air pollution within the Precinct is exhaust emissions from diesel locomotives travelling below the over station development deck. A proposed exhaust system will mechanically extract emissions and discharge them at an appropriate height above ground.

The EPA agrees with the *Pollution Assessment* that the specific location (including height) of outlet points will require detailed air quality input and detailed air quality investigations to ensure that there will be no negative air quality impacts on sensitive receivers within the Precinct.

Water quality

Receiving waterways impacted by the Precinct, that is, Darling Harbour catchment to the north and Blackwattle Bay catchment to the south, are characterised by poor water quality. To address those challenges, the Strategy encourages the implementation of water sensitive urban design principles.

While the EPA supports this approach, the Strategy should also encourage the implementation of the *Risk-based Framework for Considering Waterway health Outcomes in Strategic Land-use Planning Decisions* (Office of Environment and Heritage and EPA, 2017) and *Sydney Harbour and Parramatta River Water Quality and River Flow Objectives*, as relevant. This approach is consistent with the *Design Guide*, which aims to “support water positive precinct” design and design principle 10 of the Central Strategic Framework which encourages “water positive” actions.

Waste

The EPA supports the Rezoning Proposal’s focus on waste management in the strategic planning stage of Precinct development by reference to the *Circular Economy Policy Statement: Too Good to Waste* (NSW Government, 2018).

This focus would be strengthened by amending the Rezoning Proposal and *Sustainability Plan* to reference and encourage the implementation of the *Better practice guide for resource recovery in residential developments* (EPA, 2019). The Guide provides strategic planning tools to ensure that waste is managed effectively for mixed use residential developments.

Sewage capacity

The EPA notes that sewage systems in and around the Precinct are already at capacity. The EPA is concerned that intensified development and subsequent population growth in the Precinct will put further pressure on these systems. The EPA recommends that the proponent work closely with Sydney Water to ensure that there is adequate capacity for additional sewage loads resulting from Precinct development.

Department of Planning & Environment
Level 18
12 Darcy Street
PARRAMATTA NSW 2150

By: Online submission to the Planning Portal

Dear Department of Planning & Environment

Central State Significant Precinct – Rezoning Proposal – Heritage Council of NSW Submission

Summary

The Central State Significant Precinct is of exceptional significance as the first major rail terminus in Australia, in continuous use since 1855, and as Australia's largest heritage listed transport hub. It encompasses three State Heritage Register (SHR) listed items:

- Sydney Terminal Rail and Central Railway Stations Group (SHR 01255);
- Mortuary Railway Station (SHR 00157); and
- Ultimo Road Railway Underbridge (SHR 01232).

The Central Precinct has changed throughout its life, and the Heritage Council of NSW supports its renewal to successfully deliver economic, social and environmental benefit to the community. However, of equal importance to the community is the protection and promotion of the precinct's established heritage values as a celebrated railway landmark.

Given that COVID has accelerated profound changes to urban life and work, this rezoning proposal represents an opportunity to create the heritage of the future, with a world leading balance of functionality, heritage activation and civic development. Enhancing its value as a transport hub, while protecting its embedded heritage value, must be the primary considerations in this proposal and all future development.

The Heritage Council has considered the information on public exhibition and objects to the current rezoning proposal. Engagement with Transport for NSW (TfNSW) started in late 2020 and minimal changes have been made to address the concerns we have raised consistently throughout consultation, which remain inadequately addressed. Our previous letter to TfNSW (20 May 2022) is attached and should be read in conjunction with the comments below as part of this submission.

The exhibited plans risk missing an opportunity to achieve a world leading combination of great urban design and heritage excellence, and can be improved by addressing 7 issues:

- Proposed Gross Floor Area
- Over Station Development
- Historical Archaeology
- Aboriginal Cultural Heritage
- Conservation Management Plan
- Interpretation
- Design Guide

Central SSP proposed Gross Floor Area (GFA)

The Central Precinct has a total proposed GFA of 514,900 sqm, informed by a benchmarking study in the Urban Design Framework. We understand and support the NSW Government's commitment to deliver Tech Central that will provide up to 250,000 sqm of space for technology companies. This includes 50,000 sqm for startups and scaleups in connected locations brimming with heritage, culture and activity.

It is unclear when the benchmarking study was completed and it does not provide consistent detail on the GFA of the precincts selected. It is clear that office usage has changed radically in 2022, with many staff working 1-3 days at home and that this change is not yet fully reflected in demand and pricing for CBD commercial office space, given commercial leases are typically 3-7 years. The documents currently on exhibition do not demonstrate a meaningful consideration of the cumulative GFA in the pipeline across all Tech Central sites. While Central SSP's rezoning with a potential commercial GFA of 267,700 sqm may maximise commercial yield, it may not be realistic.

The rezoning should retain and showcase the significance of Central Precinct, with total GFA driven by an appropriate balance of new development and heritage within an acceptable level of tolerance for change. This includes the fabric and aesthetics of the buildings, the moveable heritage and significant view lines that connect the different sub-precincts and the adjoining areas. The Heritage Council is optimistic that a more realistic GFA would meet the commercial needs and broader objectives of the proposal while enhancing and retaining the precinct and its wider setting.

We therefore recommend:

- TfNSW be transparent on the GFA of the selected benchmarking precincts and the date of when the study was completed.
- TfNSW undertakes a new or revised feasibility study to inform forecast demand for commercial office space in a post-pandemic context.
- TfNSW gives greater consideration to better heritage outcomes, with a nuanced approach that distributes the GFA across all of Tech Central rather than amassing all the GFA in one high density precinct or sub-precinct.

Over Station Development (OSD)

The OSD comprises 18 - 39 storey towers located on a podium built over the rail platforms. TfNSW has advised that the towers would be leasehold, as they are built over an active rail system. Given the high construction costs of building over the rail system, A Grade Commercial space would have challenging economics in this location. It is unclear whether premium leased residential space or a hotel is a viable use.

The proposed OSD towers outlined in the masterplan would detrimentally impact the existing significant fabric, heritage curtilage, views and vistas within the cultural landscape of Central Precinct. They would result in adverse cumulative heritage impacts as the proposal is not sympathetic to the existing form, scale, mass and visual setting of Central Station precinct. The masterplan does not adequately respond to our previous feedback and advice to TfNSW.

We therefore recommend that the masterplan is modified by eliminating the OSD towers and explore low-rise options.

Historical Archaeology

Section 9.7 of the non-Aboriginal Cultural Heritage study states that, 'Current masterplan designs do not depict the exact locations over existing or potential archaeological deposits, however it is anticipated works would impact existing known and unknown archaeological deposits'.

It is known that archaeology of State significance is present within the Precinct and the entire archaeological resource of the site is a heritage asset that should be appropriately assessed throughout the design process.

We therefore recommend:

- TfNSW consider options for archaeological preservation in situ (i.e. redesign to avoid) and appropriate mitigation measures which respond to the significance of an archaeological resource and cumulative impact assessments.
- TfNSW update Section 13 of the document to reflect new section 139 Excavation Permit Exemptions, which were launched on 1 March 2022.

Aboriginal Cultural Heritage

The identification of Aboriginal cultural heritage values and consultation with Aboriginal people should be guided by the procedures outlined in the ACHS, CPDG, Central Precinct Renewal Program – Aboriginal Engagement Strategy, and the following documents:

- [Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW;](#)
- [Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010;](#) and
- [Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW.](#)

If additional significant Aboriginal cultural heritage values are identified, options to avoid impact to these values need to be explored, for example:

- Where the significance of Aboriginal cultural heritage values has been assessed as high, conservation and avoidance of these values in precinct design should always be the first option; and
- If impact cannot be avoided or if the values have been assessed as moderate, appropriate mitigation measures should be negotiated with the registered Aboriginal parties.

We therefore recommend strengthening the management of Aboriginal cultural heritage across the precinct to inform future development. We also recommend provisions be included to cover the possibility that Botany sand sheet is identified outside the area marked as high archaeological potential and to trigger the requirement for further Aboriginal cultural heritage assessment if this occurs.

Conservation Management Plan (CMP)

Conservation Policies – The conservation policies guiding the design and construction of new buildings and structures are set out in the final pages of the CMP (pages 272 - 273). Such policies should be fundamental in guiding the design of new development for the precinct. It is not evident that these principles have been considered nor adhered to in the establishment of the current proposal.

Levels of Integrity – We recommend that the definition of the levels of integrity be adjusted or the assigned levels of integrity be reconsidered. In some instances, the precinct inventories have assigned elements as 'high-moderate' or 'moderate'. There is no definition for 'high-moderate' and no distinction provided between 'high-moderate' and 'moderate'.

Elements within the Mortuary Station have been assigned as 'low' or 'moderate' levels of integrity. Despite these elements requiring conservation works, these appear to be in fairly good condition with significant features evident. We urge the assigned levels of integrity be modified to reflect its condition

and intactness. Incorrectly assigning these elements to be of low to moderate levels of integrity risks the future of Mortuary Station to have a higher tolerance for change.

Grand Concourse Roof – Table 24 *Fabric Conservation Guidelines* advises the existing green metal sheeting of the Grand Concourse to be removed and replaced with a modern glazed material responding to the design and dimension of original glazed panels to generate more natural light within the Grand Concourse. Although the roof is non-original dating to the mid-20th century, we understand the CMP identifies the Grand Concourse roof to be of exceptional heritage significance with a high level of integrity.

We do not recommend the replacement of the Grand Concourse roof with modern glazed material to be included as a conservation guideline. Should replacement of the Grand Concourse roof with modern glazed material be proposed as part of future works, this should be addressed as development works. We do, however, recommend glazed panels to be reinstated to areas where originally located as a conservation guideline instead.

Former Parcels Post Office Building – Table 6 of Precinct Inventory 3 identifies constraints within the precinct. Zone 3.1A (former Parcels Post Office) notes ‘new development is not permitted in this zone’. We recommend this to be updated as the rezoning proposal for this site has already been approved in October 2021 and the TOGA State Significant Development Application (Environmental Impact Statement) was recently on exhibition.

Historical Archaeology – We note the guidelines discussion of Section 15.6.2 *Unexpected Finds Procedure* state that ‘If the remains are confirmed to be relics, Heritage NSW would be notified’. We recommend this to be updated as under section 146 of the *Heritage Act 1977*, Heritage NSW should be notified if either known or likely/possible relic(s) are discovered. Section 146 of the *Heritage Act 1977* is not switched off by the *Environmental Planning & Assessment Act 1979*.

We also note that the CMP includes a number of references to maps, figures and information provided in the Archaeological Site Plan and is referred as Appendix B of the CMP. However, the report is not appended to the CMP. We recommend the Archaeological Site Plan be appended in the CMP for the document to successfully function as a standalone reference tool. This will ensure future management of the site will be equipped with all relevant information in the CMP.

Interpretation

The Heritage Interpretation Strategy proposes a range of innovative options, including key site stories, digital media and movable heritage/artefact displays.

We support:

- Celebrating First Nations heritage and stories and other environmental heritage and archaeology.
- Engaging with Western Gateway Sub-precinct stakeholders in the development and progress of precinct-wide heritage interpretation.

Design Guide

We understand the purpose of the Design Guide is to support implementation of the *Sydney Local Environmental Plan 2012* by providing more detailed provisions to guide development and replaces the provisions of the *Sydney Development Control Plan 2012*.


The Heritage Council has not been consulted in the development of the Design Guide, we find that the Design Guide will benefit from concise language and integration of heritage considerations across the document e.g. Section 8.3 *Advertising and signage* should include reference to conservation guidelines and policies within the CMP.

The Design guidance relating to the Mortuary Station within Section 11 *Heritage* notes vertical additions are to be 'avoided'. We recommend this is modified to vertical additions 'are not permitted' to eliminate flexibility in future works.

In conclusion, we strongly encourage continuing consultation and engagement with both the Heritage Council and Heritage NSW as our delegate during the continued development of the proposal and associated documents for the Response to Submissions stage.

If you have any queries regarding the above matter, please contact Tim Smith OAM, Director Assessments, at Heritage NSW via email [REDACTED]

Yours sincerely

A handwritten signature in black ink, appearing to read 'Frank Howarth', with a stylized flourish at the end.

Frank Howarth AM PSM

Chair, Heritage Council of NSW

27 September 2022



Our ref: DOC22/342561-1

Mr Nicholas Wolff
Program Director, Central Precinct Renewal
Infrastructure and Place
Transport for NSW
PO Box K659
HAYMARKET NSW 2000

By email: [REDACTED]
c.c: [REDACTED]

Dear Mr Wolff

RE: Central State Significant Precinct

Thank you for your presentations on 6 April 2022 and 26 April 2022 to the Heritage Council of NSW about the proposed rezoning of the Central State Significant Precinct. The Heritage Council wish to thank you and your team for the opportunity to be updated as the proposal evolves.

The Heritage Council considered the information and strongly support a holistic approach to the redevelopment of Central, Redfern and North and South Eveleigh. This is an opportunity to read this major transport corridor as one cohesive State heritage precinct.

The Heritage Council welcomes the initiatives for improved connectivity across the Central precinct, the activation of Eddy Avenue and the Mortuary Station, and for further conservation of the terminal building and Bradfield flyovers.

The opportunities for change and renewal presented by Tech Central is also a chance to recognise and celebrate the importance of Sydney Terminal and Central Railway Stations Group as a State significant place, important to all NSW. This is particularly reflected in the country and intercity platforms as a key arrival point by rail into Sydney.

Central Railway Station's primary use and associated values are intrinsically linked to it being Sydney's and NSW's main railway station and associated transport hub. Any proposed change should be consistent with that use and the station precinct should remain recognisable as a key transport hub.

We are concerned that the over station tower development, in particular the three proposed towers north of Devonshire Street, have the potential to detrimentally impact on the setting of the terminal building and the clock tower and its readability as a landmark building. The proposed development between the rail corridor and Prince Alfred Park is also of concern. The potential impacts include reducing the ability to see and understand the workings of the railway yard from the Park.

It is still unclear how the changes in level and the relationship with the interface between the existing and proposed structures has been resolved. Addressing these issues early in the process will result in better heritage outcomes. Early identification of the challenges and limitations will create opportunities for the solutions to be embedded in the proposed plans.

For instance, the realignment of the tracks and the shortening of the country and intercity platforms will see the loss of significant physical and functional connectivity between the terminal and the platforms. We understand that an interpretation strategy is being prepared by Artefact. The Heritage Council encourages the retention and interpretation of some of the significant fabric, such as the platform awnings, within the public domain space that will be created by the truncated platforms.

Underpinning the re-zoning proposal is a feasibility study, including forecasting demand for office space, that was undertaken before the pandemic. We recommend that the rezoning not proceed until a new feasibility study has been undertaken, forecasting future demand for commercial floor space in a post-Covid economy. Alternatively, that only zoning changes, if any, required for transport, public amenity and connectivity proceed at this time.

The Heritage Council welcomes any further engagement with Transport for NSW on the Central State Significant Precinct study and supporting technical documents to deliver better heritage outcomes for the precinct.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Frank Howarth', with a stylized, cursive script.

Frank Howarth AM PSM
Chair, Heritage Council of NSW

20/05/2022

c.c.

David McNamara, Director Metro East and South, Department of Planning and Environment

4 October 2022

Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124.

email: information@planning.nsw.gov.au

Dear Sir/Madam,

Central State Significant Precinct Study

Thank you for the opportunity to comment on the Central State Significant Precinct Study and accompanying documents.

To ensure sustainable future growth and the safety of aircraft and airline passengers, airspace surrounding an airport must be protected from inappropriate development.

For this reason, Australian Government regulations have long recognised the need to restrict the height of buildings and other structures (such as cranes) near airports or under flight paths. This protected airspace is formally known as “prescribed airspace”.

These regulations aim to ensure that:

- The airspace aircraft fly in is obstacle-free;
- Radar and other air navigation equipment can operate free from interference and;
- Airport safety lights are not obscured.

Sydney Airport notes that the height of some of the buildings proposed for certain development blocks in the Central Precinct will, if approved, penetrate Sydney Airport’s prescribed airspace, including the obstacle limitation surface and radar terrain clearance chart surfaces.

Future development applications for any such buildings should be referred to Sydney Airport to enable assessment under the *Airports Act 1996* (**the Act**) and *Airports (Protection of Airspace) Regulations 1996* (**the Regulations**).

It is also noted that any application for what the Act defines as a **short-term controlled activity** – which is typically a construction crane – should also be referred to Sydney Airport for assessment under the Regulations.

Further information on how to lodge applications can be found [here](#).

Please feel free to contact me on [REDACTED] or at [REDACTED] if you would like further information.

Yours sincerely,



Ted Plummer
Special Adviser Government and Community Relations

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Notice of Exhibition - Central State Significant Precinct
Date: Tuesday, 20 September 2022 2:13:46 PM
Attachments: [image003.png](#)

Hi Emily,

Thank you for providing SESLHD the opportunity to review the proposal for Central State Significant Precinct.

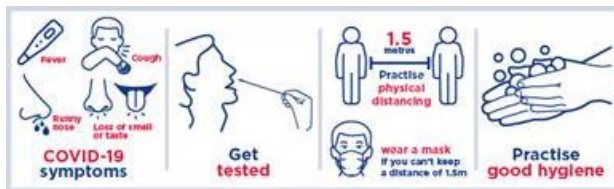
We have no feedback for the proposal.

Regards,

Lisa Altman

Director | **Strategy, Innovation and Improvement**
Mob [REDACTED]

*Please note I send emails at times that suit me.
Please read or respond at a time that suits you.*



Mr David McNamara
Director, Metro East and South (City)
NSW Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

Email: David.McNamara@planning.nsw.gov.au

Dear Mr McNamara

Re: Central State Significant Precinct Rezoning Proposal

I write in response to the public exhibition of the draft Central State Significant Precinct (SSP) rezoning proposal. The Sydney Local Health District welcomes the opportunity to provide feedback on the proposed Central Precinct and is generally supportive of the proposal.

As an anchor tenant and an Alliance partner of Tech Central, the Sydney Local Health District understands the significant role that the proposed Central Precinct will play in promoting the growth of the Tech Central Precinct, providing the physical environment to stimulate job creation and economic growth through research, innovation, and technology across the tech and medical industries as well as supporting significantly enhanced open space, connectivity, and transport access at the gateway to Tech Central.

The development provides an exciting revitalisation of this heritage site with the plans supporting greatly enhanced public amenity, sustainability and improved community facilities. However, there are a number of issues that would, in the view of the Sydney Local Health District, improve this well-developed plan.

Affordable spaces for innovation

- Sydney Local Health District would support a commitment to the provision of additional dedicated, affordable spaces for collaboration, start-ups, researchers and innovators, to continue to grow the vision of the Tech Central Precinct.

Social and affordable housing

- The publicly owned Central Railway site presents a unique opportunity to provide additional affordable and social housing within the City of Sydney for key essential workers and disadvantaged and vulnerable members of the local community¹.
- The District recommends that a minimum of 25% of new residential floor space be provided as affordable housing. This is in addition to the 15% of new residential floor space to be delivered

¹ Transport for NSW 2022, *Central Precinct Renewal Program – Social Infrastructure and Health Impact Assessment June 2022*, available: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Lisa+Drupal+Documents/Attachment+22+Social+Infrastructure+and+Health+Impact+Assessment.pdf

as diverse housing within the precinct, proposed to include student accommodation and build to rent (BTR).

- A greater supply of affordable housing will support the Tech Central Innovation Precinct vision, significantly contributing to the state's economic growth. The poor availability of local affordable housing has been identified as impacting on job creation, recruitment and retention for the technology, health and innovation sectors².
- The District recommends that the proposal reflects the City of Sydney's Community Strategic Plan *Sustainable Sydney 2030* commitment to a 7.5% target of all city housing to be social housing³ as a minimum. There is a lack of available social housing for vulnerable communities across the Sydney metropolitan area, and this significantly affects mental and social health, contributes to homelessness and impacts on the acute and community health services (including hospital discharges). The significant housing stress and homelessness within this area is widely recognised.

Social and health care services and infrastructure

- The proposal could more clearly identify the number of people proposed to be living in the Central Precinct. An increase to the population of the Central Precinct will impact demand for public and primary health care services.
- Community facilities within the Precinct will need to provide services for the population residing and working within the Precinct, culturally and linguistic diverse (CALD) communities, Aboriginal and Torres Strait Islander people, and those vulnerable and disadvantaged populations including the homeless.
- It is further recommended that dedicated spaces be provided for community meeting, primary healthcare services including GP clinics, and non-government agencies.
- Aboriginal spaces for cultural connection and expression are strongly recommended.
- It is recommended that a hearing loop within the Central Precinct is provided to cater for individuals with hearing impairments. Signage and wayfinding that is accessible by people with visual or aural impairment should be delivered.

Traffic and parking, movement and place

- The impact of the Precinct proposal on access to Sydney Dental Hospital requires further consideration and planning. The Sydney Dental Hospital has limited parking for patients, staff and contractors with approximately 75% of the 350-450 Dental Hospital patients per day traveling to the Hospital by train. Access to the Sydney Dental Hospital is impacted by the four light rail tracks, the bicycle lane and the presence of uneven surfaces / footpaths. The District would seek to ensure that patient, carer and staff safety and access to the Dental Hospital is a priority within the planning, construction and post construction phases of the development.
- The Sydney Dental Hospital is part of the Eastern Gateway to Central Station and is adjacent to the boundary of the Central Precinct. Further detail on the exact boundary is sought from the DPE as it would appear that the proposed Precinct encroaches onto the existing footpath of the Chalmers Street entrance to the Sydney Dental Hospital and the loading dock. The planning for the Central Precinct needs to ensure safe access to the Sydney Dental Hospital for patients, carers and staff during and post construction.

² *ibid.*

³ *ibid.*

- The proposed new open spaces, new active transport links and filtered permeability over the rail corridor are strongly supported. The District suggests that increased lighting in both new and existing spaces and way-finding would further improve community safety and security.
- The additional pedestrian and bicycle traffic generated by the proposed Precinct could result in increased road injuries and fatalities if existing road conditions are maintained and therefore it is recommended:
 - Maximum 30 km/h posted speed limit and design speed on all surrounding streets.
 - Continuous footpath treatments at all side streets to enhance walking safety and comfort.
 - Fewer basement car parking entrances.
 - Reduced delay/increased level of service for pedestrians/bicycles at all nearby signalised intersections and signalised pedestrian/bicycle crossings.
 - Mid-block pedestrian crossings at least every 80m on surrounding streets.
- Large off-street car parking facilities with associated traffic generated can have significant impacts on health, wellbeing and healthcare through increased traffic congestion (delays to ambulances and other emergency vehicles⁴ and increased stress⁵), road trauma⁶, noise pollution⁷, ambient air pollution⁸ and physical inactivity⁹.
- The reduction of off-street parking can reduce the construction cost and price of a dwelling by \$100,000 or more, improving housing affordability.
- The Precinct has excellent potential to be an exemplar car-free development/lifestyle and the District would strongly recommend the minimum rather than the maximum LEP car parking rates be applied in the rezoning, i.e. zero residential, student, commercial, hotel and retail car parking (except for car share and accessible spaces). A car-free development/lifestyle could be supported as a result of:
 - A strong local market demand for car-free dwellings/lifestyles. Pre-pandemic, only 28% of households in Haymarket reported owning a motor vehicle (32% in Chippendale; 34% in Ultimo) (ABS Census 2016).
 - There are already thousands of unused/underutilised off-street parking spaces in the Sydney CBD¹⁰.
 - The best public transport services/connections in the state of NSW.
 - The presence of good walking/cycling connections.
 - The availability numerous shops, services, schools, jobs, and social/recreation opportunities within walking distance of the site.

⁴ Brent, D. and Beland, L.-P., 2020, Traffic congestion, transportation policies, and the performance of first responders, *Journal of Environmental Economics and Management*, 103, p.102339.

⁵ Haider, M., Kerr, K. and Badami, M., 2013. Does commuting cause stress? The public health implications of traffic congestion. *The Public Health Implications of Traffic Congestion* (August 2, 2013).

⁶ Transport for NSW, 2022, NSW Centre for Road Safety: Interactive Crash Statistics, accessed: 08/09/2022, available: <https://roadsafety.transport.nsw.gov.au/statistics/interactivecrashstats/index.html>.

⁷ Singh, D., Kumari, N. and Sharma, P., 2018. A review of adverse effects of road traffic noise on human health. *Fluctuation and Noise Letters*, 17(01), p.1830001.

⁸ NSW State of the Environment, 2022, Air Quality, accessed: 08/09/2022, available: <https://www.soe.epa.nsw.gov.au/all-themes/climate-and-air/air-quality#transport-pressures>.

⁹ *ibid.*

¹⁰ Committee for Sydney, 2022, *Better Parking for Better Places*, <https://sydney.org.au/policy-library/better-parking-for-better-places/>.

Air pollution

- A Pollution Study has been prepared by Arcadis in association with ARUP (Attachment 14¹¹), with the main potential source of air pollution associated with the development of the Central Precinct reported to be diesel locomotive exhaust that will be emitted below the proposed deck. This will need to be extracted and vented to the surface.
- The District recommends that further detailed air quality investigations and modelling be undertaken in all subsequent design stages to ensure the ventilation system extracting the diesel exhaust emissions has appropriate capacity and outlets are located such that air quality is maintained. There should also be assessment of current and future nearby residents, air intakes for ventilation systems in surrounding buildings and infrastructure, as well as other locations susceptible to pollution such as the Sydney Dental Hospital and the proposed childcare centre. The District requests the opportunity to review the investigation and modelling results for the ventilation system extracting the diesel exhaust emissions throughout the planning and also construction phases.
- Open spaces, bedrooms, childcare centres, health centres or any other sensitive uses should be located as far as practical from the surrounding busy roads and railway lines.
- The District notes that any commercial or residential residents that require windows or doors to be closed will require installation of a supplementary ventilation system. Where mechanical ventilation must be considered due to road proximity, the air intake must be situated as far as practicable from major sources of air pollution (i.e. busy roads). If the space affected is intended for public use or a workspace, infection control mitigation strategies to minimise COVID-19 transmission should also be incorporated into the ventilation design^{12,13}.

Noise and vibration

- A Noise and Vibration Study has been prepared by RWDI (Attachment 13¹⁴) that modelled future road and rail traffic volumes for the year 2036, and reported that the existing noise environment is dominated by road traffic and rail noise, with other less significant sources such as light rail operations and some industrial noise (mechanical plants).
- However the impact of noise on the patients and staff of the Sydney Dental Hospital both during and post construction phases, has not been specifically assessed at the SDH site and is potentially a significant concern. The patients accessing the public oral health services of the SDH are by default the most vulnerable and disadvantaged, often with multiple cognitive, physical and mental health conditions. The additional health impacts of noise and vibration for this population may compound the stress associated with receiving dental care. An attended short-term noise measurement was undertaken in close proximity to the entrance of the Sydney Dental Hospital where measured noise levels ranged from 61–96dBA¹⁵. It has been recommended that noise mitigating strategies, including double glazing, are implemented prior

¹¹ Transport for NSW 2022, *Central Precinct Renewal Program – Pollution Assessment July 2022*, available: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Lisa+Drupal+Documents/Attachment+14+Pollution+Study.pdf.

¹² Ventilation in Buildings. Centres for Disease Control and Prevention; <https://www.cdc.gov/coronavirus/2019-ncov/community/ventilation.html>.

¹³ Department of Health and Aged Care 2022, *Australian Health Protection Principal Committee (AHPCC) statement on the role of ventilation in reducing the risk of transmission of COVID-19*, accessed: 08/09/2022, available: <https://www.health.gov.au/news/australian-health-protection-principal-committee-ahppcc-statement-on-the-role-of-ventilation-in-reducing-the-risk-of-transmission-of-covid-19>

¹⁴ Transport for NSW 2022, *Central Precinct Renewal Program – Noise and Vibration Assessment July 2022*, available: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Lisa+Drupal+Documents/Attachment+13+Noise+and+Vibration+Study.pdf

¹⁵ *ibid*.

to any demolition/construction and supported through a specific developer levy. The assessment of noise impacts at other specific key locations within the Precinct will also need to be considered, for example the proposed childcare centre and residential buildings.

- It is noted that construction noise and vibration impacts have not been assessed for the development of the Central SSP planning report and a detailed Construction Noise and Vibration Impact Assessment will need to be conducted for every development application submission for each new building within Central Precinct, to ensure noise and vibration mitigation is undertaken where necessary. This will ensure that the overall design and layout of buildings includes noise attenuation measures where appropriate and the orientation of residential bedrooms and outdoor balconies are faced away from the railway and busy roads.
- The District supports the recommendation of future studies and assessments to be undertaken as noted in Noise and Vibration Study (Chapter 9.4, page 71)¹⁶.

Water quality, water-sensitive design and water re-use

- The District supports the use of water-sensitive design and encourages collection of rainwater, stormwater and water recycling (A Pollution Assessment has been prepared by Arcadis in association with ARUP (Attachment 14¹⁷).
- Public health risks from using recycled water will need to be managed appropriately, including ensuring approval by the appropriate regulatory authority. All recycled water sourced from sewage, grey water, and stormwater should comply with the Phases 1 and 2 of the Australian Guidelines for Water Recycling: Managing Health and Environmental Risks (2006) as well as Australian Guidelines for Water Recycling. The licensing of proposed water recycling infrastructure (sewage, grey water and storm water) needs to comply with the requirements of the Independent Pricing and Regulatory Tribunal (IPART) under the Water Industry completion Act 2006.

Green infrastructure

- The greening of this precinct is supported.
- The District supports further incorporating green infrastructure such as rain gardens, green roofs and walls and other elements of green infrastructure into the development design (Green Infrastructure Study, Attachment 25¹⁸). Planning to increase canopy cover to mitigate urban heat effects is also strongly supported.
- The District recommends strategies be included in the planning stages to reduce, control and monitor potential mosquito breeding habitats, due to the potential for mosquito-borne disease, particularly within the context of climate change.

Summary of recommendations

In conclusion, the Sydney Local Health District recommends:

- The provision of a minimum of 30% of new residential floor space be provided as affordable housing, with a further 15% of new residential floor space to be delivered as diverse housing.
- Provision of a minimum of 7.5% of new residential floor space as social housing.

¹⁶ *ibid*.

¹⁷ Transport for NSW 2022, *Central Precinct Renewal Program – Pollution Assessment July 2022*, available: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Lisa+Drupal+Documents/Attachment+14+Pollution+Study.pdf.

¹⁸ Transport for NSW 2022, *Central Precinct Renewal Program – Green Infrastructure Strategy July 2022*, available: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Lisa+Drupal+Documents/Attachment+25+Green+Infrastructure+Report.pdf.


- Implementation and delivery of key recommendations in the Health Impact Assessment (Attachment 22: Part E) including provision of community facilities and spaces.
- A reduction in car parking and consideration of a more car-free development.
- Implementation of a robust suite of traffic mitigation measures that are delivered early in the construction phase.
- Consideration of patient, carer and staff safety, health and wellbeing whilst accessing the Sydney Dental Hospital.
- Detailed air quality investigations and modelling be undertaken in all subsequent design stages. It is recommended that a detailed Construction Noise and Vibration Impact Assessments be conducted when submitting a development application for a building at Central Precinct.
- A clear commitment to the provision of dedicated, affordable and flexible spaces for collaboration, researchers, innovators, start-ups and scale ups to support the vision of Tech Central.

The District would also welcome the opportunity to review the outcomes of any land, air or noise quality assessments conducted during the development stages, and any further sub-precinct reports given the impact of the environment on the health and wellbeing of the local community and workforce.

Thank you once again for the opportunity to provide feedback on the Central State Significant Precinct Rezoning Proposal. The District welcomes future opportunities to contribute to the planning of the Central Precinct given the significance of the proposed Precinct on the evolution of Tech Central as a global leader in innovation, technology, biotech and research.

Please contact Dr Pamela Garrett, Director Planning, Sydney Local Health District on [REDACTED] or at [REDACTED] for further information regarding this submission.

Yours sincerely



Dr Teresa Anderson AM
Chief Executive

Date: 21.9.22

From: [REDACTED]
To: [REDACTED]
Subject: RE: Notice of Exhibition - Central SSP - Closes Monday 19 September
Date: Friday, 16 September 2022 9:58:47 AM
Attachments: [image004.png](#)
[image005.png](#)

Hi Emily,

Sydney Metro Corridor Protection will not be making a formal public submission on the Central SSP planning proposal.

Some general comments have been provided internally to TfNSW directly.

Kind regards,

Harrison Depczynski
Corridor Protection – Planner
Customer Operations and Outcomes
Sydney Metro

[sydneymetro.info](https://www.sydneymetro.info)

Level 43, 680 George Street, Sydney NSW 2000
PO Box K659, Haymarket NSW 1240



6 October 2022

Our Ref: 202233

Emily Dickson

Senior Planning Officer, Metro East & South (City)
Planning & Land Use Strategy Division
Department of Planning and Environment
[REDACTED]

RE: Central State Significant Precinct

Thank you for notifying Sydney Water of Central State Significant Precinct. The rezoning proposal prepared by Transport for NSW which aims to deliver a technology and innovation precinct by enabling development over and adjacent to the railway lines at Central Station. The rezoning proposal seeks to deliver:

- around 16,000 jobs in commercial, retail, education and hotel sectors
- 850 new homes including a minimum 15% affordable housing
- 266 rooms for student housings
- more than 2 hectares of public open space
- new connections to Central Station and the surrounding suburbs.

Sydney Water has reviewed the supplied documents and provides the following comments to assist in planning the servicing needs of the proposal.

Water and Wastewater Servicing

- Our preliminary study shows that there is sufficient capacity in both the drinking water and wastewater systems to service the proposed development.
- However, due to the size and age of the servicing mains for the site, as well as to meet firefighting requirements, amplifications, adjustments, and/or minor extensions may be required. Details should be finalised at the Section 73 application stage.
- The proposal presents potentially large servicing demands and as such, further investigation will be required to determine the final servicing requirements for this site.
- It is recommended therefore that a Water Servicing Coordinator is engaged as soon as possible, and discussions held with Sydney Water prior to subsequent development occurring, if the proponent has not done so already. This may prevent development delays where significant amplifications or adjustments are required.

Recycled Water

- Sydney Water has been working in partnership with the proponent (TfNSW) to consider recycled water servicing solutions that may offset potable water demands.
- The proponent is advised to continue liaising with their Sydney Water Account Manager to investigate the potential for a commercial arrangement to supply recycled water to the development.

Stormwater

Building over or adjacent to stormwater assets

There are number of major Sydney Water stormwater trunk drainage assets located within this precinct. Sydney Water's guidelines for building over or adjacent to stormwater assets outline the process and design requirements for such activities. As per the guidelines, the applicant is advised of the following requirements:

- No buildings or permanent structures are to be proposed over the stormwater channel or within **1m** from the outside wall of the channel or within the Sydney Water easement whichever is larger. Permanent structures include (but are not limited to) basement car park, hanging balcony, roof eaves, hanging stairs, stormwater pits, stormwater pipes, elevated driveway, basement access or similar structures. This clearance requirement would apply with unlimited depth and height.
- **The applicant is required to submit the elevation drawings with the stormwater channel/ pipe, to ensure that the proposed buildings and permanent structures are 1m away from the outside face of the stormwater channel and away from the Sydney Water easement.**

Asset protection

- It is required that the proponent assess the impact of their development work on nearby water mains as per Sydney Water's [Building Over and Adjacent to Pipe Assets Guidelines](#). If any water or wastewater mains are assessed as being impacted by their work, then appropriate protective measures or adjustment/deviation should be implemented.

Trade wastewater requirement

- If this proposed development is going to generate trade wastewater, the developer must submit an application requesting permission to discharge trade wastewater to Sydney Water's wastewater system. Applicant must wait for approval and issue of a permit before any business activities can commence.
- The permit application can be made on Sydney Water's web page through Sydney Water Tap In. <http://www.sydneywater.com.au/tapin/index.htm>

Growth Forecast

- Sydney Water supports government-backed growth initiatives within our area of operations and endeavours to provide services in a timely and prudent manner that delivers cost effective water and wastewater infrastructure whilst not impacting our current customer base economically, environmentally or unduly impacting current service levels.
- To fully support all growth and developments and to fully assess the proposed development, **we require the anticipated ultimate and annual growth data** for this development. An example of our requirements are noted in the attached appendix. This can be used and returned to Sydney Water.
- Sydney Water acknowledges that timescales and final growth numbers may alter however, in order to provide robust servicing advice and to investigate the potential for

staged servicing to meet timescales, we require a realistic indication of demand and timescales. Failure to provide this may result in Sydney Water being unable to formulate proper planning requirements and lead to significant delays at the following referral stages.

- **The proponent is required to complete the attached Growth Data Form and return it to Sydney Water via urbangrowth@sydneywater.com.au or their account manager.**

This advice is not a formal approval of our servicing requirements. Detailed requirements, including any potential extensions or amplifications, will be provided once the development planning is finalised and referred to Sydney Water for a Section 73 application. More information about the Section 73 application process is available on our [Land Development](#) web page.

The development servicing advice provided by Sydney Water is based on the best available information at the time of referral (e.g. planning proposal) but will vary over time with development and changes in the local systems. This is particularly important in systems with limited capacity or out-with our [Growth Servicing Plan](#), and it is best to approach Sydney Water for an updated capacity assessment (especially where an approval letter is more than 12 months old).

Should the proponent require any further information or have any questions, they should contact their Account Manager, Grant Macdonnell at [REDACTED]. If the Department of Planning has any queries or requires any further information, please contact the Growth Planning Team at [REDACTED].

Yours sincerely,



Kristine Leitch

Commercial Growth Manager
City Growth and Development, Business Development Group
Sydney Water, 1 Smith Street, Parramatta NSW 2150