

Transport for NSW

Central Precinct Western Gateway (Block C) Rezoning Proposal

Response to Submissions Report



July 2021 | FINAL

Contents

Executive Summary	5
1 Introduction	12
1.1 Background.....	13
1.1.1 Recent State infrastructure projects.....	13
1.1.2 Tech Central (formerly Sydney Innovation and Technology Precinct / Camperdown-Ultimo Collaboration Area)	16
1.1.3 Nominated Central Precinct State Significant Precinct.....	18
1.1.4 The opportunity at the Western Gateway Sub-Precinct.....	20
1.2 Case for change	21
2 Consultation.....	23
2.1 Community engagement	23
2.2 Government agency and stakeholder engagement	24
2.3 Public exhibition of the Western Gateway Block C Rezoning Proposal.....	24
3 Overview of submissions	26
3.1 Key community feedback	26
3.2 Government and non-government organisation submissions	27
3.3 Project Review Panel	28
4 Response to key issues raised.....	32
4.1 Heritage	32
4.1.1 Designing with Country	32
4.1.2 Responding to existing heritage context	33
4.1.3 Physical and structural impacts to heritage items	38
4.1.4 Curtilage to the former Parcels Post Office building	43
4.1.5 Site-specific conservation management plans.....	45
4.1.6 Consultation with Heritage Council	46
4.1.7 Consistency with the Central Precinct Draft Strategic Vision	47
4.2 Built form.....	49
4.2.1 Height, scale, and density	49
4.2.2 Building setbacks and separation	51
4.3 Movement, access, and public spaces.....	55
4.3.1 Vehicular transport issues.....	55
4.3.2 Pedestrian movement, open space and public domain	56
4.4 Amenity.....	60
4.4.1 Overshadowing	60
4.4.2 Wind and microclimate impacts	60
4.4.3 Visual and view impacts.....	62
4.5 Sustainability.....	64
4.6 Responding to the COVID-19 pandemic	65
5 The revised proposal	67
5.1 Revised Publicly Accessible Space Strategy for the Western Gateway	67
5.2 Amendments to the draft Western Gateway Design Guide	72
6 Conclusion	77
6.1 Next steps.....	77
7 Response to submissions table.....	78

List of Figures

Figure 1.	Sydney Metro alignment map.....	15
Figure 2.	Sydney Metro platforms and Central Walk.....	16
Figure 3.	Precinct goals for Sydney’s innovation and technology precinct	18
Figure 4.	Central Precinct SSP Study Area	20
Figure 5.	Comparison of north-east corner upper level setback between reference scheme and 10m setback requirement set out in the Sydney DCP 2012.....	53
Figure 6.	Indicative upper level publicly accessible space vertical connections	68
Figure 7.	Indicative upper level publicly accessible space sightlines and activation.....	68
Figure 8.	Lower level public accessible space framework.....	69
Figure 9.	Lower level active frontages, key connections and daylight penetration	69
Figure 10.	Key publicly accessible places of the Western Gateway sub-precinct.....	71

List of Tables

Table 1.	Summary of issues raised in community submissions	26
Table 2.	Summary of submissions issues raised by key stakeholders	27
Table 3.	Notes and recommendations of the Project Review Panel	29
Table 4.	Response to Heritage NSW’s recommendations that have not translated into the revised draft Western Gateway Design Guide	36
Table 5.	Summary of amendments to Western Gateway Design Guide.....	72

List of Attachments

- Appendix A** – Supplementary Urban Design Response Letter prepared by FJMT
- Appendix B** – Supplementary Heritage Response Letter prepared by Urbis
- Appendix C** – Supplementary Wind Impact Assessment Letter prepared by RWDI
- Appendix D** – Supplementary Transport Assessment Letter prepared by GTA Consultants
- Appendix E** – Supplementary Structural Response Letter prepared by Robert Bird Group
- Appendix F** – Supplementary Proponent’s Response to Submissions Report prepared by Urbis
- Appendix G** – Revised Draft Western Gateway Design Guide
- Appendix H** – Western Gateway Publicly Accessible Space Strategy

Author:	Ben Craig (Director), David Attwood (Principal Planner), Costa Dimitriadis (Urbanist)
Date:	13.07.2021
Version:	FINAL

Acronyms

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

Executive Summary

Purpose of report

The purpose of this report is to respond to the key issues raised by government agency, non-government organisation and community submissions during the public exhibition of the Western Gateway Block C Rezoning Proposal. The report also outlines:

- consultation activities undertaken; and
- a description of changes made to the rezoning proposal based on the submissions.

Background

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

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

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

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

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

- Amend the Sydney LEP 2012 by introducing a site-specific provision that stipulates alternate building height and gross floor area controls for Block C where development is for the purposes of non-residential land uses. These include:

- a maximum building height of RL 211.9 metres; and
- a maximum gross floor area of 43,000sqm.
- Preclude clause 6.21(5)-(7) of the Sydney LEP 2012 from applying to Block C, removing its eligibility to an additional amount of height or floor space of up to 10% of the maximum permissible that is the result of a competitive design process (Note: The Western Gateway Design will require a competitive design process to be undertaken for Block C in accordance with the applicable guidelines of the Government Architect NSW or the City of Sydney Competitive Design Policy).

Overview of submissions

The Western Gateway Block C Rezoning Proposal was publicly exhibited over a six week period between 16 December 2020 and 29 January 2021, wherein 24 submissions were received. The type of respondents commenting on the exhibiting Western Gateway Block C Rezoning Proposal include:

- 16 submissions from the community
- 2 submissions from government agencies
- 1 submission from the City of Sydney Council
- 5 submissions from non-government agencies.

Overall, the submissions received were largely unsupportive of the exhibited Western Gateway Block C Rezoning Proposal in its current form, with 16 unsupportive of the proposal in its current form, 2 supportive of the proposal and 6 neutral submissions.

The key issues raised in the submissions were:

- Heritage
- Built form
- Movement, access, and public spaces
- Amenity
- Sustainability
- Responding to the COVID-19 pandemic

The revised Proposal

Based on the feedback received during the public exhibition of the Western Gateway (Block C) rezoning proposal, a revised proposal has been submitted for DPIE's consideration as part of its assessment. While the planning envelope has not been amended, further work supporting the rezoning proposal and refinements to the proposed planning framework have been made.

An updated Western Gateway Publicly Accessible Space Strategy

A revised Publicly Accessible Space Strategy has been prepared to establish a framework for the renewal of the public domain in the Western Gateway sub-precinct, as part of broader changes occurring in the Central Station Precinct (refer to **Appendix H**).

The Publicly Accessible Space Strategy will align with the objectives and guidelines set out within the draft Western Gateway Design Guide and will guide the future design of the public domain within the Western Gateway sub-precinct and its integration with the plans for a Central square at the Western Forecourt and Railway Square. This has been

prepared in consultation with key stakeholders, including the proponents for Blocks A, B and C to ensure that future redevelopment of the sub-precinct is supported by a high quality, activated public domain that creates opportunities for conversation and collaboration, transit and relaxation.

To ensure the principles and guidelines of the Publicly Accessible Space Strategy are met, a detailed public domain plan will be required as part of any future development application in the Western Gateway sub-precinct (including Block C) to demonstrate how each proposal has been designed to deliver a high quality, co-ordinated public domain consistent with the principles and strategies set out in the Publicly Accessible Space Strategy.

The revised Western Gateway Design Guide

The following amendments to the draft Design Guide for the Western Gateway sub-precinct (refer to **Appendix G**) are outlined within the table below. Minor corrections to grammar and spelling are not included within this Table.

It is noted that since lodgement of the Block C rezoning proposal, the draft Western Gateway Design Guide (V4) has undergone a separate parallel finalisation process associated with the proposals for Blocks A and B. The proposed amendments in relation to the Block C rezoning proposal have been made to the latest version of the draft Western Gateway Design Guide (version 4 May 2021).

Ref.	Section	Proposed amendment
Section 2.1 Desired future character		
1	Section 2.1 (h)(n)	The Western Gateway sub-precinct will: [...] (h) Be characterised by a built form that embraces and celebrates the area's historical significance, responds sympathetically to the visual, spatial, and physical character of the place and enables the retention and adaptive re-use of key heritage items [...] (n) Embeds the Aboriginal and Non-Aboriginal historical and cultural values of the place (including intangible values) in a holistic and integrated way through a Heritage Interpretation strategy for the entire precinct identifying key themes, stories, social values, interpretive opportunities, measures and locations as an integral component of creating a unique and exciting destination..
Section 3.1.1 Publicly accessible managed space		
2	Figure 2	Updated figure for publicly accessible managed space and pedestrian connections
Section 3.1.2 Building Massing and envelope		
3	Section 3.1.2 Objective (c)	(c) Development is to provide an appropriate vertical clearance and curtilage to existing heritage items, in particular the Former Inwards Parcel Shed and Former Parcels Post Office Building.
4	Section 3.1.2 Objective (d)	(d) Any building structure within the vertical separation zone above the former Parcels Post Office building is to be minimised and sufficiently set back from the northern and western façade line to ensure the preservation and integrity of the restored roof.

Ref.	Section	Proposed amendment
5	Section 3.1.2 (13)	<p>(13) 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:</p> <ul style="list-style-type: none"> a. comprise a single tower form with a maximum floorplate gross building area of 1,300 sqm 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 b. must be designed to ensure that any tower form above the former Parcels Post Office building is not located north of a chamfered setback that aligns with a diagonal from the north-east corner to the south-west corner of the heritage building c. must be designed to ensure that the tower is setback a minimum 5m from the north-east and south west corners of the former Parcels Post Office building (parallel to the northern and western facades respectively) d. must have a minimum separation of 16m from the Block A planning envelope and a minimum 12m separation between western façade of the Block A building and the eastern façade of the Block C building e. be designed to ensure must have floor plate protrusion that is no greater than 16m from the southern façade face of the former Parcels Post Office, and allow for a ground level and lower ground level pedestrian connection of no less than 8m between the southern structural core and the southern façade of the former Parcels Post Office building f. provide a vertical separation zone between the underside of the tower and topmost point of the reinstated double pitched roof to the Parcels Post Office Building, which: <ul style="list-style-type: none"> 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 Office building iii. does not comprise building enclosures other than necessary structural elements to support any vertical addition to the former Parcels Post Office 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 Office 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 Parcels Post Office 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

Ref.	Section	Proposed amendment
		<p>floor area on Block C as defined by the Sydney Local Environmental Plan 2012.</p> <p>Note: where controls reference the need to setback from façade of the former Parcels Post Office building, the setback should be calculated from the average of the substantive façade face of the former Parcels Post Office, excluding projections and cornices.</p>
6	Figure 3	Updated figure for separation distances and setbacks for lower levels of the Western Gateway sub-precinct
7	Figure 4	Updated figure for separation distances and setbacks for upper levels of the Western Gateway sub-precinct
8	Figure 6	New figure for North-South Section - Separation distances and setbacks (Blocks C – B)
9	Figure 7	Updated figure for East-West Section - Separation distances and setbacks (Blocks A – C)
Section 3.1.5 Wind		
10	Figure 7	Updated figure for wind criteria map to include Block C planning envelope
Section 3.1.6 Solar access		
11	Section 3.1.6 Objective (a)	(a) To maintain a high level of daylight access to Henry Deane Plaza and other affected publicly accessible areas during the period of the day when they are most used by the workforce, visitors and the wider community.
Section 3.1.7 Views and vistas		
12	Section 3.1.7 (3)	(3) The separation between Block A and Block B is to be open to the sky from RL30 and above to ensure that view lines from the over station pedestrian connection through to the tower of the Marcus Clarke building are not interrupted
Section 3.2.1 Heritage		
13	Section 3.2.1 Objective (a)	(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.
14	Section 3.2.1 Objective (b)	(b) Development is to retain and re-use any assessed heritage significant heritage items , features, specific spaces and fabric of significance.
15	Section 3.2.1 Objective (c)	(c) Development is to enable the sensitive adaptive re-use of any assessed heritage -significant heritage items , features, specific spaces and fabric of significance.
16	Section 3.2.1 (1)	(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.

Ref.	Section	Proposed amendment
17	Section 3.2.1 (4)	(4) Development is to comprise of building forms and design treatments that give consideration and positively responds to heritage items within and immediately surrounding the sub-precinct. The Statement of Heritage Impact that accompanies a development application is to 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.
18	Section 3.2.1 (6)	(6) Architectural detailing t is to provide a higher order of priority to the levels interfacing with the heritage items and adjacent public domain. This should take an informed and strategic approach to form, colour, materials, and details and respond to the immediate context and character.
19	Section 3.2.1 (9)	<p>(9) Development on Block C is to:</p> <ul style="list-style-type: none"> a. incorporate an innovative structural response to minimise the impact of structural intrusion on significant heritage elements of the former Parcels Post Office building, and enhance legibility of significant heritage facades (for clarity this does not include the highly modified eastern façade). 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 Office building and the lowest point of the underside of the tower above as shown in Figure 7: Separation Distances and Setbacks (Blocks A-C). c. be designed to ensure 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. d. be designed to ensure vertical circulation to access the upper floor plates above the former Parcels Post Office 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. 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. f. Future development is to increase ground level public access to the existing former Parcels Post Office 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

Ref.	Section	Proposed amendment
		<p>Group and GANSW to identify practical ways of implementing the principles for action in the draft 'Connecting with Country Framework' (GANSW, 2020)</p> <p>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.</p>

Next steps

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

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

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

1 Introduction

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

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

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

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

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

The Western Gateway Rezoning Proposal was publicly exhibited over a six-week period between 16 December 2020 and 29 January 2021, during which 24 submissions were received on the proposal from community members, non-government organisations, State government agencies and the City of Sydney Council.

This Response to Submissions Report provides a response to the key issues raised by submissions during the public exhibition period, and outlines any proposed amendments to the Western Gateway Rezoning Proposal, if necessary. A summary of all submissions and responses can be found within **Section 7** of this report.

1.1 Background

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

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

The station and its immediate surrounds are also the most highly accessible and well connected of places in NSW. The grandeur of the main terminal, the concourse and the clock tower along with the historical and social significance of the broader place makes Central Station and its surrounds, a highly unique and remarkable location within Sydney. On 15 September 2016, the Minister for Transport and Roads announced the Government's intention to revitalise and transform Central Station into a world class transit hub. An opportunity to revive the surrounding areas around Central Station in conjunction with station upgrade projects was also identified. Community consultation and engagement undertaken by Transport for NSW is discussed in Section 2.1.

Block C of the Western Gateway sub-precinct is strategically located on the western edge of Central Station and within Haymarket on the southern fringe of the Sydney CBD. It comprises the Adina Apartment Hotel building and Henry Deane Plaza that are currently occupied by a mix of tourist accommodation and retail uses. The proximity of Block C to Central Station and the CBD, its location at the entry to the Devonshire Street Tunnel and frontage to the Western Forecourt of Central Station and Railway Square means that it is ideally placed to be part of the first phase in the future renewal of the broader Central Precinct.

1.1.1 Recent State infrastructure projects

In the last decade, there has been significant Government investment to cater for better and more connected transport infrastructure across NSW to support Sydney's population growth and improve accessibility and amenity for its residents and visitors. Many of these projects will greatly improve the accessibility, functionality and useability of the Central Precinct. Some of these projects (Sydney CBD and south east light rail, Sydney Metro and Central Walk), in particular, are anticipated to reduce demand for road dependent transport modes (such as buses and private vehicles), alleviating traffic congestion on city roads and indirectly improving pedestrian amenity and safety within Central Sydney.

These transformational, city shaping State infrastructure projects are described below.

Sydney CBD and South East Light Rail

The new CBD and South East Light Rail is transforming public transport in Sydney, providing high capacity, clean and reliable services. The 12km route features 19 stops, extending from Circular Quay along George Street to Central Station, through Surry Hills to Moore Park, then to Kensington and Kingsford via Anzac Parade and Randwick via Alison Road and High Street.

Regular services run every 4-8 minutes between Circular Quay and Moore Park, and every 8-12 minutes between Moore Park and Randwick and Kingsford in the 7am-7pm peak on weekdays.

Sydney Metro

Sydney Metro is Australia's biggest public transport project and will result in the delivery of a new generation of world-class fast, safe and reliable trains enabling faster services across the network.

Once complete, metro train services will be able to be provided once every two minutes in each direction at peak times under the city, a level of service never before seen in Sydney. Sydney's new metro railway will have a target capacity of about 40,000 customers per hour, similar to other metro systems worldwide.

Sydney Metro, together with signalling and infrastructure upgrades across the existing Sydney rail network, will increase the capacity of train services entering the Sydney CBD – from about 120 an hour today to up to 200 services beyond 2024. An increase of up to 60 per cent capacity across the network to meet future demand.

The first stage of Sydney Metro commenced operation in May 2019, connecting Sydney's North West suburbs to Chatswood. Construction for the second stage is currently underway with the opening of Stage 2 Sydney Metro services scheduled for 2024. Stage 2 of Sydney Metro will connect Chatswood to Central Station via Crows Nest Metro, Victoria Cross Metro, Barangaroo Metro, Martin Place Metro and Pitt Street Metro (refer to Figure 1). New underground platforms will be provided for Sydney Metro under Platform 13, 15 and 16 at Central Station.

The first stage of Sydney Metro has significantly reduced demand on bus services accessing Central Sydney from Sydney's north west, reducing road traffic and congestion within the CBD. Delivery of the second stage of Sydney Metro is anticipated to further reduce bus dependency and improve amenity and safety for pedestrians within Central Sydney as road traffic is reduced.

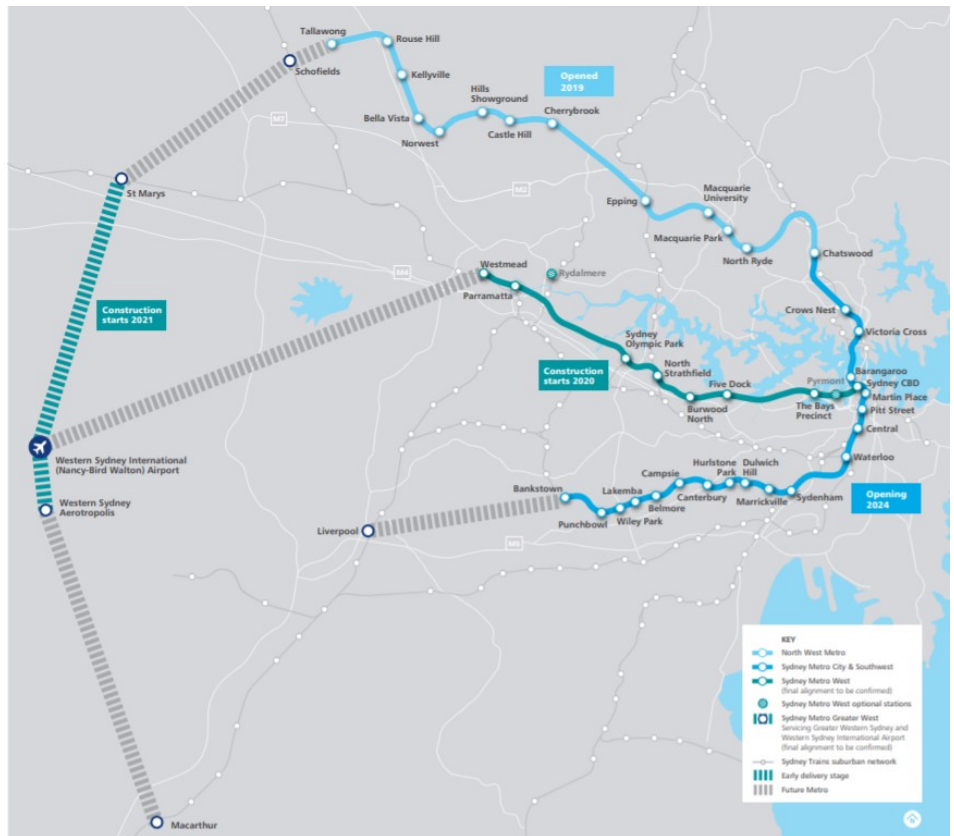


Figure 1. Sydney Metro alignment map

Source: Sydney Metro

Central Walk

On 21 December 2017, the Minister for Planning approved a modification to the CSSI Approval (Mod 2 Approval) in relation to Central Walk at Central Station. Central Walk is a new underground pedestrian concourse that will better connect passengers to trains, light rail and Sydney Metro underground platforms (refer to Figure 2). It will include:

- A new 19-metre wide tunnel from Chalmers Street linking to new Sydney Metro platforms under Central Station
- New, easy access points to Sydney Trains platforms 16 to 23
- Escalators linking directly to suburban platforms for the first time.

The entry at 20-28 Chalmers Street will provide direct access to Central Station for customers from the Surry Hills catchment area and a direct interchange for passengers from the CBD and South East Light Rail.

Once complete, Central Walk will help boost capacity at Central to cater for the expected 66 per cent increase in daily customer demand. More than 270,000 people use Central every day with that number expected to rise to 450,000 in the next two decades. As part of the broader Central Precinct renewal, investigations are also underway to extend Central Walk to provide single east-west concourse connecting all platforms and enabling the creation of a second east-west pedestrian link through the Central Station site.



Figure 2. Sydney Metro platforms and Central Walk

Source: Transport for NSW

1.1.2 Tech Central (formerly Sydney Innovation and Technology Precinct / Camperdown-Ultimo Collaboration Area)

Tech Central is an essential component of the Greater Sydney Region Plan’s Eastern Harbour City Innovation Corridor and encompasses the areas between Central Station, Royal Prince Alfred Hospital and the Waterloo Metro Station and is approximately 6km² in size. It is home to an existing technology and innovation community, a network of premier research and education institutions (including University of Sydney and University of Technology Sydney) and a growing ecosystem of technology related industries.

The Western Gateway sub-precinct is located in the Central State Significant Precinct within Tech Central and represents the significant first stage in delivering the Tech Central vision as it will provide a substantial amount of new commercial floorspace that will catalyse the innovation and technology initiative in Central Sydney. A key component of this is a new marker building that will be occupied by Atlassian as the first anchor tenant of the precinct, supporting some 4,000 jobs within a single building that is directly aligned with the goals set out in the Sydney Innovation and Technology Panel Report.

In August 2018, the NSW Government established the Sydney Tech taskforce panel (the Panel) comprising representatives from various industry, health, education, government agencies and key community members. In December 2018, ‘The Sydney Innovation and Technology Precinct Panel Report’ was produced, setting out the Panel’s recommendations for a pathway to delivering a successful innovation and technology precinct at Tech Central. Through collaboration with Sydney’s tech industry, health, education, and government stakeholders, the Panel prepared a vision for the Precinct to be:

“A place where world-class universities, ambitious startups, high-tech giants and the community collaborate to solve problems, socialise and spark ideas that change our world. The Precinct will be underpinned by high quality physical and digital infrastructure.”

In preparing the report and developing the vision, the Panel identified several economic and social benefits associated with the creation of a new innovation and technology precinct in Central Sydney, including:

- the creation of significantly more local jobs and wages growth
- the creation of new skilled career pathways
- increased business profits, exports and competitiveness
- improved ability for Sydney to attract and retain talent and investment
- improved connectivity and walkability within and surrounding the precinct
- numerous other beneficial social, environmental and cultural outcomes.

Panel Chair, David Thodey AO states in his covering message that *“the Precinct has shown all the unique market drivers to be a globally recognised precinct, including major innovation technology anchors, culture, location, transportation and walkability. It will deliver significant benefits to the people of NSW.”*

In order to capitalise on the opportunity and realise the vision, the Panel identified the following key themes as being essential attributes for a successful innovation and technology precinct:

- the importance of developing a diverse precinct
- affordability for startups and scaleup companies
- strong, independent and transparent leadership and governance
- high quality connectivity both physically and digitally.

In February 2019, the NSW Government adopted the Panel’s recommendations, which among other things aim to deliver an additional 25,000 jobs in the precinct. Atlassian, a global Australian-based software enterprise company, has agreed to work with the NSW Government to help establish and grow Tech Central.

Also in February 2019, a Place Strategy for what is now known as Tech Central was released (Camperdown-Ultimo Collaboration Area Place Strategy, GSC). The Place Strategy, developed collaboratively by a range of stakeholders involved in planning for the Precinct’s future, identifies the following vision:

“In 2036, Camperdown-Ultimo Collaboration Area is Australia’s innovation and technology capital. Industry, business, health, education and skills institutions work together, and talent, creativity, research and partnerships thrive. Low carbon living, green spaces, places for people and easy connections support resilience, amenity, vitality and growth.”

The Place Strategy also identifies shared objectives for the place and sets out priorities and actions to realise the vision. The proposal will help realise the vision for Tech Central as it will:

- provide new premium quality commercial accommodation that will support new investment and new jobs within the area
- deliver positive economic and social benefits to NSW by increasing the CBD’s productivity and delivering major improvements to the surrounding publicly accessible open space (e.g. Henry Deane Plaza and through site links)
- provide space for businesses that align with the vision for Tech Central, and in doing so help foster an ecosystem of tech related industries that will advance local research, discovery and innovation

- provide spaces that support industry collaboration
- be supported by excellent public transport, walking and cycling facilities and will make a substantial contribution to the creation of great places through direct improvements to Henry Deane Plaza and surrounding public domain
- be the subject of a robust design excellence process to ensure the delivery of an outstanding architectural outcome that engages with the street and surrounding built environment
- foster a stronger economy and bring more workers and visitors in to the CBD, in doing so improve the resilience of the local community and businesses
- be underpinned by a high quality sustainability strategy that ensures a high quality ESD outcome.



Figure 3. Precinct goals for Sydney's innovation and technology precinct

Source: *The Sydney Innovation and Technology Precinct Panel Report*

1.1.3 Nominated Central Precinct State Significant Precinct

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

- Central Precinct is a large area of land owned by the NSW Government

- Central Precinct is of State importance and has the capability of making a significant contribution to achieving Government policy objectives, particularly in relation to jobs creation, improvement of place, transport connectivity and accessibility, sustainability and quality of living
- Central Precinct comprises numerous items and areas of State or regional importance for heritage or historical significance.

The nominated Central Precinct SSP has an area of approximately 24 hectares and is bound by Pitt Street and Regent Street to the west, Cleveland Street to the south, Eddy Avenue, Hay Street and Goulburn Street to the north, and Elizabeth Street and Chalmers Street to the east (refer to Figure 4). The Precinct includes:

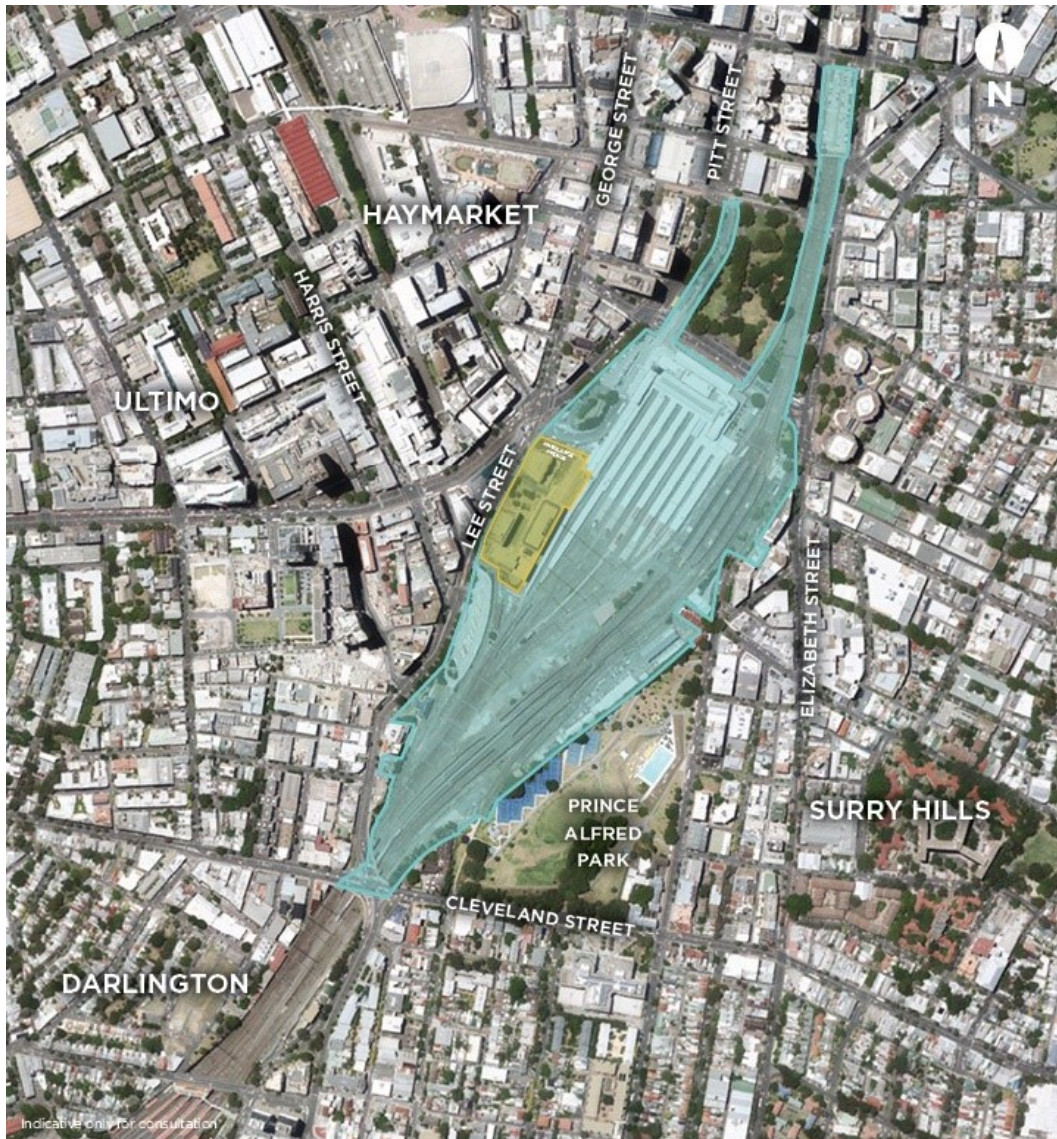
- Central Station and surrounding NSW Government owned land along the rail corridor
- Goulburn Street car park
- a precinct along the Lee Street edge of the Precinct, known as the Western Gateway (within which the subject site is located).

Nomination of Central Precinct as an SSP presents the opportunity to expand Sydney's core central business district further south to encapsulate Central Station and its surrounds, and in doing so reconceptualise and transform this area to serve as a vital and vibrant new heart of Central Sydney.

The SSP nomination started a detailed planning process for the Central Precinct that involved preparing a Strategic Framework that sets out an overarching vision for the precinct, identifies key themes and priorities, nominates parts of the precinct as sub-precincts, and provides direction on how the vision for the Central Precinct will be realised over the coming decades. The Strategic Framework establishes the foundation for further detailed investigations to be undertaken as part of the Stage 2 SSP process and is still in the process of being finalised following the conclusion of its initial assessment in August 2020. The Strategic Framework is anticipated to be finalised in the near future.

The Central Precinct SSP investigation area has been divided into a number of sub-precincts to facilitate the future renewal in a manner that positively responds to the varying character of the surrounding area. Specifically, the Western Gateway sub-precinct was identified by the Minister for Planning and Public Spaces as being appropriate for early rezoning ahead of the broader Central Precinct Renewal Program. Whilst the detailed planning for the Western Gateway sub-precinct has progressed in advance to the remainder of Central Precinct, careful assessment and consideration has been undertaken to ensure that planning for this sub-precinct remains aligned and integrated with the overall vision of the renewal of the broader precinct.

Extensive technical work and community and stakeholder consultation will continue to be carried out over the next two to three years to assist with preparing the State Significant Precinct Study, including continued collaboration with key government agencies and stakeholders.



Central Precinct SSP study area

— SSP study area
 — Western Gateway

Figure 4. Central Precinct SSP Study Area

Source: Transport for NSW website

1.1.4 The opportunity at the Western Gateway Sub-Precinct

The Western Gateway sub-precinct (including Block C) is strategically located on the edge of the Central SSP and is therefore well placed to be delivered as a standalone site, without limiting or compromising the future potential of adjoining sub-precincts. The sub-precinct is also uniquely placed to catalyse renewal across the broader Central Precinct as it embodies many of the characteristics and qualities identified by the Sydney Innovation and Technology Precinct Panel as being essential for a successful 21st Century innovation and technology precinct.

Namely, the Western Gateway sub-precinct provides an opportunity to create a quality place that will act as a beacon for future innovation and technology businesses. A place that is easy to walk around, that is supported by high-quality public transport and

infrastructure, and which will enable entrepreneurs, start-ups and established businesses to meet, socialise, collaborate and do business.

The Western Gateway sub-precinct also benefits from its proximity to an established 'innovation, creative and technology' cluster that stretches from Camperdown to Ultimo and which contains an existing ecosystem of creatives and technology start-ups together with key educational, research and health institutions.

Renewal of the sub-precinct also represents a significant opportunity to enhance the quality of the public domain and contribute to an improved built environment characterised by new high-performing low-emission buildings with renewable energy and water conservation infrastructure.

1.2 Case for change

Sydney is recognised as a global city, with Central Sydney being its economic powerhouse. Central Sydney generates nearly \$108 billion in economic activity annually, which represents 8 percent of the total national economy, and provides nearly 300,000 jobs. To ensure Sydney remains globally competitive and a city that draws and attracts talent, investment and business partnership opportunities, it is essential that opportunities for growth and innovation are cultivated and capitalised upon.

The opening of the remaining part of Sydney CBD and South East Light Rail in April 2020 and Sydney Metro (including the Central Walk) in 2024 will be a game changer for this part of Sydney by providing world-class transport services, enabling the creation of new communities and precincts. Planning for three significant new neighbourhoods in the surrounding area is already underway with the Redfern and North Eveleigh Precinct, Waterloo Redevelopment Precinct and the Waterloo Metro Quarter.

Sustained demand for CBD commercial floorspace and a lack of development sites in its north and mid-town means that the Sydney CBD is expanding to the south, where significant public and private investment is already occurring. Renewing Central Precinct will relieve future constraints on growth in the Sydney CBD and help to secure Sydney's status as a global city.

Community and stakeholder engagement has confirmed the appetite for renewal of the Central Precinct. Customers, residents, businesses and visitors have said they want the Central Precinct to become a destination in itself – a vibrant city hub with a strong sense of place and unique identity, with transport and mobility at its core.

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

Redevelopment of the Western Gateway sub-precinct will also enable the rethinking of the western interface of Central Station as more than a 'point of transit' to access transport infrastructure, but as a 'place' and 'destination' within Central Sydney. As Central Station evolves in the near future to integrate Sydney Metro services, such as the Sydney CBD and South East Light Rail and Central Walk, the proposal for the Block C as part of the Western Gateway sub-precinct, in collaboration with these planned and committed transport upgrade projects, will:

- revitalise the Western Gateway sub-precinct in a manner that capitalises on significant NSW Government investment in planned transport infrastructure upgrades

- deliver an outcome that contributes to achieving the vision and priorities set out within the State, Metropolitan, District and local planning strategies
- reinforce Sydney's status as a global city that attracts global investment and partnerships
- create 1,546 additional full-time equivalent jobs and 43,000sqm employment floor space in line with anticipated future demand
- contribute to reimagining the Western Gateway as a 'place' and 'destination' in its own right at the southern end of Sydney CBD
- initiate and kick-start renewal of the broader Central Precinct
- anchor and establish the delivery of Sydney's proposed new technology and innovation precinct.

The Block C proposal is part of the broader renewal of the Western Gateway sub-precinct. In conjunction with the planned transport infrastructure upgrades, it presents a rare opportunity to catalyse broader transformational change that is needed to reinvigorate the southern edge of the city into a new, vibrant, exciting, socially inclusive and environmentally sustainable place for workers, visitors and the community.

2 Consultation

2.1 Community engagement

Community engagement has been an important factor in shaping the work that has contributed to the draft Central Precinct Strategic Framework, which was taken into consideration in the preparation of the draft SEPP report. The consultation work undertaken by Transport for NSW to date has included:

- between September and November 2016, Transport for NSW surveyed the community, customers and visitors and hosted an online discussion forum with close to 200 people participating in a conversation about the future development of Central Station. We heard that:
 - people thought the highlight of the Central Precinct was its heritage and the architecture of Central Station
 - Central Station was sometimes a disappointing experience and that it needed to be easier to navigate, cleaner, have better lighting and security with more variety of food, shops, cafes and bars
 - there was support for a revitalisation of Central Station with a desire to see more commercial and retail places; improved facilities and more public open spaces that respect the heritage of the area and buildings.
- In 2018 transport customers were asked what they would like to see at Central Station and in the surrounding area. We heard that:
 - people want a vibrant city hub with easy access to transport services
 - the Precinct should be a destination in itself, not just a transport interchange with cultural and leisure opportunities
- In October 2019, publicly exhibited the draft Strategic Vision for Central State Significant Precinct (SSP) and the Western Gateway Rezoning Proposal (Blocks A and B) SEPP rezoning for a period of 6 weeks. The key issues raised during the exhibition included:
 - support for the proposed land uses of commercial uses for technology and knowledge-based industries and active uses such as retail, food and beverage, entertainment and night-time activation uses in the precinct.
 - support for the provision additional open space and more trees and greening of the precinct.
 - strong support for improving pedestrian movement and connections and linking key neighbourhoods (Surry Hills, Haymarket, Chippendale).
 - an emphasis on the provision of cycling network/infrastructure for the precinct and surrounds.
 - amenity concerns relating to visual impact and wind condition due to the proposed density
 - positively responding to the local character and heritage context of Central Station
 - commitment to sustainability and net zero emissions.
- In December 2020, publicly exhibited the Draft Central Western Gateway Block C rezoning proposal for a period of 6 weeks (see **Section 2.3** for further detail).
- Ongoing engagement with key Government agencies and stakeholders, including the Government Architect NSW, Department of Planning, Industry and Environment,

Department of Premier and Cabinet, Greater Sydney Commission and City of Sydney Council.

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

2.2 Government agency and stakeholder engagement

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

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

State Design Review Panel

The Western Gateway sub-precinct proposal has been a design-led process, with the State Design Review Panel (SDRP) commissioned to review and provide expert advice on each of the indicative site-specific proposals, including the proposed planning envelope and the indicative reference scheme prepared for Block C. The SDRP comprises six panel members including the Acting NSW Government Architect (Chair of the SDRP), a representative from the City of Sydney, and four independent design experts.

The SDRP have also informed the strategic planning for the broader Central Precinct as well as the preparation of the draft Central Precinct Strategic Framework, including its vision, themes and key opportunities.

The proposed planning envelope and indicative reference scheme submitted for Block C were subject to an iterative design review and feedback process with the SDRP. Alongside preliminary schemes for Blocks A and B within the Western Gateway, the proposed scheme for Block C was presented to the SDRP between July 2019 and December 2019 for preliminary feedback at least five (5) times and at least another four (4) presentations to the SDRP were conducted from May through to September 2020.

The indicative schemes and proposal were refined in response to guidance received from the SDRP to ensure that the proposal was capable of delivering high-quality built form and public domain outcomes which are supportable from a design perspective as outlined throughout Section 7.4 and Section 7.5 of the draft SEPP report and as described within the Urban Design Report which accompanied the application at **Appendix A**.

It is recognised that City of Sydney Council's representation on the SDRP does not reflect an endorsement by the City of Sydney Council.

2.3 Public exhibition of the Western Gateway Block C Rezoning Proposal

DPIE publicly exhibited the Western Gateway Block C Rezoning Proposal for a period of six weeks between 16 December and 29 January 2021. The exhibition was promoted on DPIE's website. During the exhibition period, the following community and stakeholder engagement activities were undertaken:

- meetings were held with key stakeholders including the City of Sydney, Camperdown-Ultimo Alliance comprising of University of Sydney, University of

Technology Sydney, Notre Dame University, TAFE NSW, Sydney Local Area Health District and Health Infrastructure.

- 9,500 flyers were distributed to residents and businesses within a 500 metre radius of Central Precinct
- 120 emails were sent to Central Precinct mailing list subscribers
- over 10 direct emails were made targeting local community groups and key neighbours with project and exhibition information
- the Central Precinct Renewal webpage was updated with project information and how to have your say via a direct link to DPIE Planning Portal
- a dedicated one-to-one virtual meet the planning team session was held during the exhibition period that provided community members the opportunity to ask the team questions
- two enquiries responded to via Transport for NSW's project website and email address.

The public exhibition of the Block C Rezoning Proposal resulted in the receipt of 24 submissions in relation to the proposal. These submissions are described in **Section 3** of this Response to Submissions Report.

3 Overview of submissions

During the public exhibition period there were 24 submissions received in response to the Western Gateway Block C Rezoning Proposal. The type of respondents commenting on the exhibited Western Gateway Rezoning Proposal, include:

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

Overall, the submissions received were largely unsupportive of the exhibited Western Gateway Block C Rezoning Proposal in its current form, with 16 unsupportive of the proposal in its current form, 2 supportive of the proposal and 6 neutral submissions.

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

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

3.1 Key community feedback

A number of issues were raised in the community submissions, each of which are summarised in Table 1.

Table 1. Summary of issues raised in community submissions

Issue	Description
Responding to heritage	Concern the proposal may not appropriately respond to heritage significant elements on site and surrounds, its consistency with the Conservation Management Plan and the structural impacts caused to the former Parcels Post Office building.
Built form	The proposed height is excessive, with it being more appropriate to set the scale and height of buildings on the existing building forms. Future buildings should be designed to suit the post-COVID-19 situation, with enough space for social distancing. Inadequate setbacks are provided to the Block A building.
Land use	The proposal should reconsider the inclusion of additional office, retail and hotel uses, given the COVID-19 pandemic which has resulted in the emergence of people working from home.
Connectivity and accessibility	The proposal should support better pedestrian connections at ground and underground locations, between Chippendale, Prince Alfred Park, Central Station and Surry Hills, by way of widening footpaths, providing green canopies and traffic reducing mechanisms, as well as expediting the coverage of train tracks between Central and Redfern to create public space, green space and commercial space.
Views and visual impacts	The proposal will result in negative impacts on existing views and vistas, particularly from streets and public spaces, removes key views to significant heritage items, generates significant cumulative visual impacts in conjunction with Block A and B, and will contribute to the Western Gateway sub-precinct being considerably larger than any future development over the rail line.

Issue	Description
Public space	More street trees, green canopy, roof gardens, rain guards, greening and amenity improvements, as well as connections between existing public spaces and the community should be included.
Overshadowing	The proposal should ensure that Prince Alfred Park is not overshadowed by any development.
Wind impacts	Concern that the proposal will culminate in a wind-tunnel stemming from the height of buildings.
Design	Concern that the proposal may result in development with poor design outcomes which do not appropriately address the existing heritage buildings.

3.2 Government and non-government organisation submissions

A number of government and non-government organisation submissions were received during the public exhibition of the Western Gateway Block C Rezoning Proposal. Table 2 below identifies the government agencies and non-government organisations that provided submissions and outlines the key issues they raised. Further detail surrounding these identified issues is provided in **Section 4** of this Response to Submissions Report.

Table 2. Summary of submissions issues raised by key stakeholders

Stakeholder	Issues raised
Government	
City of Sydney Council	<ul style="list-style-type: none"> • Oppose the proposed redevelopment of the former Parcels Post Office building. • The Western Gateway Design Guide should be finalised. • Heritage issues surrounding consultation with Heritage NSW, the adoption of a Conservation Management Plan, curtilage provided to the former Parcels Post Office building and structural impacts to heritage fabric. • Designing with Country. • Open space issues including the lack of a coordinated urban design strategy for the entire Central Precinct, consultation with the City for an open space strategy, references to open space and assumptions for land outside the Western Gateway. • Pedestrian movement issues including the provision of open sky ground level connections and the public release of pedestrian modelling informing the proposal. • Microclimate issues and recommendations that wind tunnel testing be undertaken on the proposed envelope instead of the reference design and specific wind comfort standards should be adopted within the site and surrounds. • ESD concerns regarding the lack of an integrated precinct approach to ESD for the Western Gateway and recommendation of specific targets and benchmarks to be applied to the proposal. • Transport issues, namely the lack of detail about vehicle numbers, the inclusion of car parking, and the need for further assessment of pedestrianisation strategies.
Heritage NSW	<ul style="list-style-type: none"> • Responding to heritage. • Built form. • Views and visual impacts.

Stakeholder	Issues raised
NSW Environment Protection Authority	<ul style="list-style-type: none"> No issues raised.
Non-government organisations	
University of Technology Sydney	<ul style="list-style-type: none"> Importance of the proposal resulting in significant public benefits that allow for improvements to pedestrian connectivity and capacity.
The National Trust	<ul style="list-style-type: none"> Responding to heritage. Curtilage provided to the former Parcels Post Office building. The view and visual analysis is inadequate. Inconsistency with the Central Precinct Draft Strategic Vision and Western Gateway Draft Design Guide.
Frasers Property Australia and Dexus Funds Management Limited (the Consortium)	<ul style="list-style-type: none"> Building massing on the south of the Adina Hotel landing in Henry Deane Plaza should be limited to lightweight structures. Technical clarifications are required to clarify the extent of lease holdings and RLs applying to the proposal. Wind modelling should be updated as it was based on the reference scheme for Block B. A complete traffic assessment is required, noting that the proposed servicing arrangements are contingent on the proponent reaching a commercial agreement with the Consortium.
Jamie Parker MP	<ul style="list-style-type: none"> The proposal does not constitute 'designing in context', resulting in detrimental impacts to heritage, views, landscape and sense of place within the precinct. The proposal is inconsistent with the Central Conservation Management Plan.
Action for Public Transport (N.S.W) Inc	<ul style="list-style-type: none"> Further development in the Western Gateway should not be pursued until there is appropriate rail and pedestrian capacity to handle additional uses.

3.3 Project Review Panel

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

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

The advice from the Project Review Panel is that the Western Gateway Block C Rezoning Proposal will need to address the recommendations set out in **Table 3** below.

Table 3. Notes and recommendations of the Project Review Panel

Issue	Panel recommendations
<p>Connecting with Country</p>	<ul style="list-style-type: none"> The panel recommends that engagement be undertaken prior to the approval of a DA or competitive design brief, in consultation with the City of Sydney’s Aboriginal and Torres Strait Advisory Group and Government Architect NSW, and that an appropriate principles and commitments framework is implemented to ensure Connecting with Country considerations are addressed.
<p>Built form and heritage context</p>	<ul style="list-style-type: none"> The panel noted the significant work of the Design Review Panel (DRP) to establish key principles and metrics for the site. The panel noted the need to reinforce key DRP advice to ensure the bulk and scale of the proposal does not negatively impact on the heritage context. The panel recommended that scale plans be included in the RtS consisting of the area of the maximum envelope and the proportion that the 1,300sqm GBA floorplate occupies. The panel recommends a change to the Design Guide relating to the need for flexibility within the 1,300sqm GBA floorplate to ensure the design excellence process can achieve suitable outcomes. The panel recommends that the Design Guide be amended to include a reference to the key metric of 41,000sqm (maximum tower and to preclude void areas from being deducted from GFA calculations. The panel recommends a full suite of Design Guide amendments recommended by Heritage NSW be included if the proponent considers these achievable and appropriate justification provided if any of these are considered unfeasible. The panel notes that the Project Working Group will provide further detailed advice regarding key issues in relation to the RtS and heritage response for the proponent’s consideration prior to finalising the RtS.
<p>Physical and structural impacts on the former Parcels Post Office building</p>	<ul style="list-style-type: none"> The panel noted some concern surrounding the lack of detail in the RtS and reinforced the need for a more innovative structural response to be adopted to preserve the heritage value of the former Parcels Post Office building. The panel suggested that a more innovative response may consider moving the structural columns further from the north-west corner of the former Parcels Post Office building, use of bridge or truss between the flanking walls to support loads or possible cantilevering of structure. The panel noted that the structural response should focus on increasing separation and clarity between the former Parcels Post Office building and any future structure. The panel recommended that detail of any alternative approaches and further justification be provided to address the issue of minimising structural impacts, as raised by Heritage NSW and the City of Sydney. The panel recommended that no core elements be located in or through the former Parcels Post Office building.
<p>Vertical separation above the former Parcels Post Office building</p>	<ul style="list-style-type: none"> The panel noted that the proposed amendments to the Design Guide in relation to the vertical separation above the former Parcels Post Office building does not sufficiently address its previous advice and the advice of the DRP. The panel recommends that the RtS includes evidence that further detailed analysis into the minimisation of encroachment into the vertical separation zone has been undertaken, and that a further setback analysis is included to

Issue	Panel recommendations
	<p>appropriately address Heritage NSW's submission which seeks greater setbacks on the north-east and south-west corners of the former Parcels Post Office building without reducing the 21m between the north-west corner and the chamfer.</p> <ul style="list-style-type: none"> • The panel recommends the Design Guide be amended to require a minimum 12.6m clearance for the vertical separation zone from top of reconstructed roof to underside of the tower above. • The panel recommends the Design Guide be amended to require no lift cores and minimal structure within the vertical separation zone. • The panel recommends that the Design Guide be amended to stipulate that encroachment within the vertical separation zone be minimised and metrics be included.
Reconstruction of the original former Parcels Post Office building roof	<ul style="list-style-type: none"> • The panel noted some confusion in the RtS regarding the reconstruction of the original roof. • The panel noted that the DRP supported the reconstruction but that it was originally double pitch, not mansard. • The panel recommends that the RtS be updated to appropriately reference the reconstruction of the original roof which was double pitch.
View and visual impacts	<ul style="list-style-type: none"> • The panel noted that the proposed envelopes result in potential for significant view and visual impacts on the eastern and southern façades of the former Parcels Post Office building. • The panel noted the previous advice of the DRP which sought that the tower floor plate extension into Henry Deane Plaza should not exceed 16m. The advice notes that while half of this depth will be required for the tower core, it is preferred that the remaining space as far as possible not be enclosed. • The panel recommends that the RtS be amended to ensure diagrams and commentary are based on the planning envelope, not the reference scheme. • The panel recommends that the Design Guide be amended to promote the use of materials or other measures such as transparent materials, void spaces at lower levels to ensure the original façades can be interpreted and measure to ensure compliance with the DRP's previous advice that the southern extension of the envelope be as far as possible not enclosed.
Site specific Conservation Management Plan (CMP)	<ul style="list-style-type: none"> • The panel noted the heritage significance of the former Parcels Post Office building relates to its role within the entirety of the State Heritage Register listing which incorporates the entire station precinct. As such, it recommends that a CMP should not be site-specific and instead should be part of a holistic CMP for Central Precinct which evolves over time as further work on the OSD component continues.
Consultation with the NSW Heritage Council	<ul style="list-style-type: none"> • The panel noted the RtS recommends ongoing consultation with the NSW Heritage Council at key stages of design. • The panel recommends that further meaningful, workshop-style engagement be undertaken with the NSW Heritage Council prior to the approval of a DA or a competitive design brief.
Public domain	<ul style="list-style-type: none"> • The panel noted a detailed Publicly Accessible Strategy has been prepared in response to its previous advice and noted some concerns regarding the lack of diagrammatic detail. • The panel recommends that the public domain strategy be updated to include additional diagrams and sketches to illustrate how key parts of the precinct will operate and look in the future, provide clarifications around the

Issue	Panel recommendations
	<p>nature of the proposed access arrangements such as stairs and ramps with appropriate dimensions and gradients, and embed any vertical circulation requiring lifts into the adjacent built form.</p>
<p>Pedestrian modelling</p>	<ul style="list-style-type: none"> • The panel noted the City of Sydney’s submission issue relating to the need for pedestrian modelling. • The panel recommend the RtS be updated to demonstrate appropriate justification of the proposed pedestrian network and include any modelling outcomes or assumptions used to inform the proposal.
<p>Wind</p>	<ul style="list-style-type: none"> • The panel recommended the Design Guide be finalised and submitted and that the wind comfort criteria be consistent with its previous advice noting the need for walking, standing and sitting criteria at key locations. • The panel noted the proposal results in significant wind issues with the comfort criteria of two locations reduced from ‘walking’ to ‘uncomfortable’. • The panel recommended the proponent carefully consider its approach to wind, noting that wind issues are significant and that the wind issues located between Blocks A and B require a coordinated response, while other wind issues to the north and south of the proposed envelope should be addressed by the proponent.
<p>Sustainability</p>	<ul style="list-style-type: none"> • The panel noted its previous advice regarding the need for the Western Gateway Design Guide to be finalised and submitted with the RtS.

4 Response to key issues raised

4.1 Heritage

4.1.1 Designing with Country

Parties which raised this issue:

The City of Sydney

Issues raised in submission

The City of Sydney's submission raised concerns around the lack of evidence of significant and meaningful consultation with the City of Sydney's Aboriginal and Torres Strait Islander Advisory Group and the Government Architect NSW's Aboriginal Liaison Officer. It recommends that the proponent engage in an ongoing, meaningful consultation workshop process with the City's Aboriginal and Torres Strait Islander Advisory Group and the Government Architect's Aboriginal Liaison Officer.

Project Review Panel recommendations

The Project Review Panel (Panel) recommends that engagement be undertaken prior to the approval of a DA or a competitive design brief, in consultation with the City of Sydney's Aboriginal and Torres Strait Advisory Group and the Government Architect NSW. It also recommended that an appropriate principles and commitment framework be put in place to ensure Connecting with Country considerations are addressed.

Discussion and response

Transport for NSW and Toga recognise the opportunity for the Western Gateway (Block C) sub-precinct to help support the health and wellbeing of Country by valuing, respecting, and being guided by Aboriginal people. Specifically, Transport for NSW and Toga are committed to embracing the GANSW's Connecting with Country Draft Framework to ensure that meaningful engagement with local Indigenous groups is conducted.

While committed to this process, it is difficult to undertake consultation without a detailed design and clear understanding of what is proposed to be delivered. Notwithstanding this, further ongoing engagement with the City of Sydney's Aboriginal and Torres Strait Advisory Group will be undertaken prior to the lodgement of a DA for the comprehensive redevelopment of Block C, which has been included as design guidance within the revised draft Western Gateway Design Guide (refer to **Appendix G**).

Furthermore, the draft Design Competition brief, to be endorsed by the Government Architect NSW prior to the commencement of a design competition, outlines the strategies of the Connecting with Country Draft Framework and requires that competitors:

- consider opportunities for on-site interpretation of storytelling and continuity of the site history
- demonstrate in the Final Submissions how early consideration of the Connecting with Country strategies and principles have been considered
- 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.

Outcome

Further engagement with the City's Aboriginal and Torres Strait Advisory Group and the GANSW will be undertaken prior to the lodgement of a DA for the comprehensive redevelopment of Block C, which has been included as design guidance within the revised draft Western Gateway Design Guide (refer to **Appendix G**). Notwithstanding this, the GANSW's Connecting with Country Draft Framework forms part of the design brief for a future Design Competition for Block C.

4.1.2 Responding to existing heritage context

Parties which raised this issue:

Heritage NSW

The City of Sydney

The National Trust

Jamie Parker MP

Members of the public

Issues raised in submissions

Submissions highlighted concern that the proposal's tower form will result in visual impacts as it does not relate to the predominant scale, density and grain of the significant built form, the fabric of the SHR-listed building elements, cultural landscape context and the landmark qualities of the former Parcels Post Office building. Furthermore, submissions also recognised that these impacts would be exacerbated through the cumulative impact of the proposal in conjunction with the proposed Block A and B developments.

The National Trust also advised that it considers that a 200 metre addition above a heritage item cannot successfully retain the prominence of the former Parcels Post Office building in the streetscape. Additionally, Jamie Parker MP raised his concern that the tower form of the proposal would impact on the sense of place within the precinct. The City of Sydney has also outlined that they do not regard the site as being suitable for a new tower.

Notwithstanding the above matters, Heritage NSW advised in its submission that these impacts could be somewhat reduced through high-quality design that puts the significant heritage values of the site at the core of the redevelopment, which could be further explored during the competitive design process and subsequent DA stage. Suggestions made included increasing the proposed setback from the northern and western facades to preserve the integrity of views to the building, along with careful consideration of the proposed building form to ensure it respectfully responds to the heritage values, character, form, proportions and setting of the existing structure. Further suggested amendments to the draft Western Gateway Design Guide have also been provided by Heritage NSW.

Likewise, the National Trust encourages that the important and historic components of the locality are harnessed to enable an urban renewal outcome on the site that facilitates a unique urban identity. However, it also notes that it does not accept that the proposal is a good example of maintaining and celebrating the heritage significance of the former

Parcels Post Office building, which is envisaged in the objectives of section 3.2.1 of the Draft Design Guide.

Project Review Panel recommendations

The Project Review Panel recommends that the Western Gateway Design Guide be amended to include the full suite of amendments recommended by Heritage NSW and if this is considered unachievable, appropriate and detailed justification should be provided.

Discussion and response

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

- The draft Conservation Management Strategy submitted as part of the exhibited Block C rezoning proposal which outlines principles to inform a future Conservation Management Plan for the former Parcels Post Office to accompany any future detailed development application for Block C
- The draft Western Gateway Design Guide which outlines a series of objectives and design guidance relating to heritage which will be a matter for consideration during the competitive design process and the detailed development application stage for Block C
- A precinct-wide Conservation Management Plan will be prepared as an overarching heritage vision and a series of specific heritage objectives and policies for the Central Precinct which will inform future heritage studies undertaken to support any future development application(s) within the Western Gateway sub-precinct (including Block C). This is to ensure any future development in the Western Gateway sub-precinct broadly aligns with the framework's vision, objectives and policies for the Central Precinct.

While the City of Sydney have stated that they do not regard Block C as a suitable development site for a new tower, it is noted that the proposed building envelope has been developed through iterative design review from the DRP which includes City of Sydney representation. 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 its Central Sydney Planning Strategy and Local Strategic Planning Statement for instance includes a tower cluster area around Central Station with Ultimo, Haymarket and parts of Surry Hills as the future southern extension of the Central Sydney CBD. While these areas may not be directly adjacent to Central Station these controls will facilitate future towers that will continue to change and evolve the context of the southern end of the CBD. The CSPA vision for the southern CBD, combined with the Western Gateway and the Central Precinct more broadly recognises an overarching vision of growth and renewal in this area and in doing so, has established a reasonable expectation for change to occur. This change is focussed on creating new spaces for jobs in knowledge-based industries, and is balanced with the delivery of cultural, social and essential infrastructure and new public spaces commensurate to this growth.

Furthermore, and as noted within the Supplementary Heritage Response prepared by Urbis (**Appendix B**), 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. However, over time and with the ongoing evolution of the city, the Station building is no longer the largest building in the CBD, or even within 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.

While change may occur, this will not undermine the importance of ensuring a future development outcome that responds to its broader heritage context. As part of the exhibited Western Gateway Block C Rezoning Proposal, a Heritage Impact Statement was prepared to support the proposal for the Western Gateway sub-precinct. This Heritage Impact Statement provides a detailed analysis of the heritage context and demonstrates the proposal is suitable, subject to the recommendations and guidelines made. Such recommendations that have been incorporated into the proposal heritage framework for the Block C proposal, include:

- Retaining key heritage values and fabric of the existing building via a future precinct-wide Conservation Management Plan and design guidance contained within the Draft Western Gateway Design Guide and the submitted Conservation Management Strategy.
- Ensuring that development does not result in a net adverse impact on the key heritage components of the building, most notably the 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 in accordance with a future Conservation Management Plan at the detailed DA stage.
- 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).
- Ensuring that the proposed development is spatially well separated from immediate surrounding heritage items. Further, the proposed development is also spatially set back and well separated from the Sydney Terminal building and Clock Tower so that it doesn't dominate or block views to those items. The proposed setbacks have been adopted into the draft Western Gateway Design Guide.
- Requirements for new buildings to comprise forms and design treatments that positively respond to scale and materiality of these existing buildings, which will be required by the draft Western Gateway Design Guide.

In accordance with the Project Review Panel's recommendation, consideration of Heritage NSW's recommended amendments to the draft Western Gateway Design Guide. The majority of these recommendations have been carried through to the revised draft Western Gateway Design Guide with exception to a select few which would have broader implications on Blocks A and B of the Western Gateway sub-precinct. It is noted that since exhibition of the Block C rezoning proposal, the draft Western Gateway Design Guide (V4) has undergone a separate parallel finalisation process associated with the proposals for Blocks A and B. This has seen a number of matters progressed and resolved between relevant stakeholders prior to the anticipated adoption of the Design Guide. Given the proponents for Blocks A and B have lodged their Development Applications based on the resolutions made during this finalisation process, the implementation of further amendments based on Heritage NSW's recommendations may not be possible.

A response has been provided to Heritage NSW's recommendations that have not been carried through to the revised draft Western Gateway Design Guide in **Table 4** below. A

summary of all amendments to the to the draft Western Gateway Design Guide is provided at **Section 5.2**.

Table 4. Response to Heritage NSW’s recommendations that have not translated into the revised draft Western Gateway Design Guide

Heritage NSW recommended amendments	Response	Comment
<p>2.1 Desired future character</p> <p>The Western Gateway sub-precinct will:</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>2.1 Desired future character</p> <p>The Western Gateway sub-precinct will:</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>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>2.1 Desired future character</p> <p>The Western Gateway sub-precinct will:</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</p> <p>The Western Gateway sub-precinct will:</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>Guidance around referencing the draft Connecting with Country Framework for Block C has been included at Section 3.2.1(9)(h) of the draft Western Gateway Design Guide.</p>
<p>3.2.1 Heritage Objectives</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>(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>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>

Heritage NSW recommended amendments	Response	Comment
		As noted earlier, the objectives for 3.2.1 Heritage have has seen a number of refinements as part of a separate parallel finalisation process associated with the proposals for Blocks A and B. As such, the implementation of further amendments based on Heritage NSW's recommendations may not be possible.
<p>3.2.1 Heritage</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>3.2.1 Heritage</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>It is noted that DAs for development in the sub-precinct have already been lodged with DPIE and the City of Sydney. As such the application of this suggestion may not be possible.</p> <p>Proposed specific details regarding themes and programs will be identified as part of a future heritage interpretation strategy and through future engagement with the City of Sydney's Aboriginal and Torres Strait Advisory Group and GANSW.</p> <p>As noted earlier, the objectives for 3.2.1 Heritage have undergone a number refinements as part of a separate parallel finalisation process associated with the proposals for Blocks A and B. As such, the implementation of further amendments based on Heritage NSW's recommendations may not be possible.</p>
<p>3.2.1 Heritage</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</p>	<p>3.2.1 Heritage</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</p>	<p>As highlighted in earlier comments, the weight of existing context and character it problematic given the evolving nature of the precinct.</p> <p>As noted earlier, design guidance under for 3.2.1 Heritage has undergone a number of refinements as part of a separate parallel finalisation process associated with the proposals for Blocks A and B. As</p>

Heritage NSW recommended amendments	Response	Comment
<p>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>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>such, the implementation of further amendments based on Heritage NSW's recommendations may not be possible.</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>It is considered this change would be inappropriate for the delivery of new buildings within the Western Gateway sub-precinct.</p>

Outcome

Any future competitive design process detailed development application for Block C will be subject to the proposed heritage framework for Block C, including:

- The draft Conservation Management Strategy submitted as part of the exhibited Block C rezoning proposal;
- The draft Western Gateway Design Guide; and
- A precinct-wide Conservation Management Plan for the Central Precinct (including the Western Gateway sub-precinct).

Based on Heritage NSW's submission, amendments to the draft Western Gateway Design Guide (refer to **Appendix G**) have been made. Refer to **Section 5.2** for a summary of these amendments.

4.1.3 Physical and structural impacts to heritage items

Parties which raised this issue:

Heritage NSW

The National Trust

The City of Sydney

Issues raised in submissions

Heritage NSW notes that penetration and disruption of spaces and heritage fabric should be minimised. The City of Sydney submission recommends that a cantilevered approach be adopted high above and separated from the former Parcels Post Office building in order to avoid any infill or support structures penetrating through the heritage building and resulting in a loss of significant heritage fabric.

The National Trust opposes the Heritage Impact Statement's reliance on the argument that 'the robust nature of the building' allows it to accommodate intrusions to facilitate the proposal, given that the National Trust seeks to maintain these robust and dignified qualities. Community submissions also raised concerns over the permitting of lift cores and structural zones to be inserted through the former Parcels Post Office building.

Project Review Panel recommendations

The Project Review Panel recommends that the RtS include detail of any approaches or options and further justification to address the issue of minimising/precluding structural impacts raised by Heritage NSW and the City of Sydney during public exhibition.

The panel also recommends that the design guide be amended to include reference to the need for an innovative structural response in order to minimise impacts on the former Parcels Post Office building so that the future design competition further explores more innovative solutions in the detailed design stage. It is also recommended by the panel that no core elements be located in or through the former Parcels Post Office building.

Discussion and response

It is noted that the significant elements of the former Parcels Post Office building primarily constitute its exterior, rather than the interior components. Specifically, the heritage façade is of historic significance, reflecting the importance of parcel distribution by rail during Sydney's early European settlement. The history of the building design and development is functional, with the interior elements described in the Supplementary Heritage Response prepared by Urbis (**Appendix B**) as 'historically modest, pedestrian and unremarkable,' and it is generally understood that this is by design.

Importantly, there is no specific interior fabric from which additional structure would detract from the significance of the former Parcels Post Office building, and the principle of inserted additional elements into the floorplates is considered acceptable from a heritage perspective, as outlined in the Supplementary Heritage Response prepared by Urbis (refer to **Appendix B**).

Further, a study of interventions into highly significant buildings highlights several successful examples which the DPIE and the City of Sydney have considered appropriate in the past. One significant instance is the major redevelopment of the Education Building on Bridge Street, commonly known as the Sandstone Precinct, which has a number of comparable elements, notably being 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 and a new roof top addition. Other proven structural interventions to heritage significant items within the City of Sydney, include:

- 65 – 77 Market Street, Sydney – David Jones store addition
- 198 Pitt Street, Sydney – addition to City Tattersalls Club, Sydney
- 183 – 185 Clarence Street, Sydney – addition to Substation No.164.

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 can be appropriately managed so that it will 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.

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. Notwithstanding this, the potential structural zones of the proposed envelope for Block C has been focused on minimising structural intrusion into the former Parcels Post Office building as much as possible. This is demonstrated through an indicative line of structural columns located from the north-east to south-west of the former Parcels Post Office building and a potential structural zone on the eastern façade of the building which is identified as not original building fabric and suitable for re-interpretation to facilitate development.

Through the evolution of the proposed building 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 Office building. Following discussions with technical consultants it became evident that any option that did not require structural intervention to the former Parcels Post Office building would be unable to 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 building envelopes, it is not possible to develop a structural solution that cantilevers over the former Parcels Post Office building without support structure passing through the heritage building. This is addressed in the Supplementary Structural Response prepared by Robert Bird Group, included at **Appendix E**.

The façade has been extensively altered and no original fabric is discernible except at the northern and southern ends of the facade. Notably, the eastern façade was originally a simpler façade and even so has been extensively altered over time. Specifically, parcel lifts were introduced in c. 1915 and a later extension was constructed c.1969 (which 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**.

Given the above, the reference scheme for Block C has been designed with the intention of minimising loss of significant fabric by utilising the eastern facade of the building for the core as this eastern façade has been heavily modified and therefore possesses the least heritage significance. Moreover, it seeks to return significant components back to the site such as the initial roof form which was originally visible behind the parapet. The Supplementary Heritage Response prepared by Urbis (refer to **Appendix B**) notes that the structural interventions to the eastern façade of the building would be acceptable for the following reasons:

- the façade will remain partly visible, with the reference scheme not obscuring the northern façade which is most visible from Railway Colonnade Drive, therefore ensuring that the building remains legible and retains its connection with the Inward Parcel Shed through their shared early architectural character
- intervention is concentrated to the eastern façade as it has been subject to the greatest modification over the years and therefore possesses the least heritage significance
- public domain improvements between the former Parcels Post Office building and the Inwards Parcel shed could facilitate public congregation, with heritage interpretation integrated in the area to highlight the historic functional connection shared 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 Office building, to be detailed following completion of an Architectural Design Competition, is anticipated to be acceptable from a heritage perspective.

In response to the Project Review Panel's recommendation for justification for the minimisation of structural impacts, a Supplementary Structural Response has been prepared by Robert Bird Group (refer to **Appendix E**). This provides a full analysis of alternative options considered to structurally support a vertical addition above the former Parcels Post Office building. As previously outlined, the proposed reference design represents a minimal intervention solution to the significant heritage fabric of the former Parcels Post Office building, notably aligning columns to the existing grid structure of the original building and isolating façade intervention to the eastern façade. Furthermore, a cantilevered structural solution for the proposed planning envelope was explored (refer to **Appendix E**), however was found to be unfeasible from a structural perspective. Notwithstanding this, multiple core location options explored were found to be feasible within the proposed planning envelope, with these core location options able to be explored in further detail through the Architectural Design Competition process.

Notwithstanding that the proposed structural solution provides an acceptable heritage and visual impact on the site as outlined in the reference design by FJMT at **Appendix A**, it is noted that the revised draft Western Gateway Design Guide has been updated (refer to **Appendix G**) to require that any vertical addition to the former Parcels Post Office 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 Parcels Post building. This will ensure the design competition further explores more innovative solutions. The onus will be 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 Office building with the existing core and structural grid of the building.

In response to the Project Review Panel's recommendation that no core elements be located in or through the former Parcels Post Office building, it is noted that the former Parcels Post Office building currently requires core elements to be upgraded within the existing building to meet contemporary building codes, whether a vertical addition is proposed on Block C or not (refer to **Appendix E**). Further, contemporary building cores have been previously included through the former Parcels Post Office building, as outlined in the Heritage Impact Statement (refer to **Appendix 7** of the submitted Rezoning Proposal) 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. More specifically to the point of requiring a new core to support the tower form, the Structural Options Analysis included within the Supplementary Structural Response prepared by Robert Bird Group (refer to **Appendix E**) outlines the implications of removing new core elements to support the tower form within the former Parcels Post Office building.

Notably, the Robert Bird Group analysis (refer to **Appendix E**) explores an option of no new core vertically intruding the former Parcels Post Office building in order to service the

tower. The implication of proceeding with this option would be the need for a larger core to the south of the former Parcels Post Office building (requiring further encroachment into Henry Deane Plaza and impacting views to the southern façade of the former Parcels Post Office building) and the requirement for additional structural supports to the western edge of the tower floor plate to offset the reduced lateral stability provided by a narrow eastern core completely outside the former Parcels Post Office building (expected to require larger columns and bracing between columns within and above the former Parcels Post Office building). As such, a no core intruding the former Parcels Post Office building option would lead to greater heritage impacts, if pursued.

While structural elements to support the tower protrude the former Parcels Post Office building to some extent, it is recognised that the impacts associated with any structure or core through the former Parcels Post Office 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 a competitive design process.

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 maintaining the visual prominence of the northern and southern façades of the former Parcels Post Office 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.

As such, in response to this recommendation additional provisions are proposed within the revised draft Western Gateway Design Guide to ensure that any structure or core through the former Parcels Post building results in an appropriate visual, heritage, and structural impact.

Outcome

Based on the above considerations, the Design Guidance Section 3.2.1 (8) of the draft Western Gateway Design Guide (refer to **Appendix G**) has been amended to:

(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 Office building, and enhance legibility of significant heritage facades (for clarity this does not include the highly modified eastern façade).*
- 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 Office building and the lowest point of the underside of the tower above as shown in Figure 7: Separation Distances and Setbacks.*
- c. *be designed to ensure 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.*
- d. *be designed to ensure vertical circulation to access the upper floor plates above the former Parcels Post Office 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.*
- 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.

- f. *Future development is to increase ground level public access to the existing former Parcels Post Office 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.*

4.1.4 Curtilage to the former Parcels Post Office building

Parties which raised this issue:

The National Trust

The City of Sydney

Issues raised in submissions

The City of Sydney submission recommends that the zone between the former Parcels Post Office building and the base of the tower is predominantly clear of structure to provide an appropriate curtilage to the heritage building. The National Trust also notes that the proposed tower does not allow for a positive physical curtilage.

Project Review Panel recommendations

The Project Review Panel recommends that the RtS:

- 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
- be updated to appropriately reference the reconstruction of the original roof which was double pitch.

The panel also recommended the following amendments to the design guide:

- minimum 12.6m clearance for the vertical separation zone from top of reconstructed roof to underside of the tower above
- no lift cores and minimal structure within the vertical separation zone
- encroachment within the vertical separation zone must be minimised and metrics must be included (in accordance with previous PRP advice).

Discussion and response

It is noted that the City of Sydney is of the position that the 'transition zone' between the former Parcels Post Office building and the tower should not be fully enclosed. As such, the guidance within the draft Western Gateway Design Guide which relates to this 'transition zone' has been refined to provide greater clarity over what can occur in this zone. Specifically, it now notes that built form must be minimised within the transition zone to ensure a clear visual distinction is achieved between the former Parcels Post Office Building and the tower. This is intended to address the City of Sydney's concern while providing flexibility to participants of a future Architectural Design Competition to explore unique and creative responses to this 'void space' within the transition zone.

Notwithstanding above, the Project Review Panel's recommendations for the draft Western Gateway Design Guide (**Appendix G**) are all to be made, except for the matter precluding lift cores and minimal structure within the vertical separation zone. For this matter, an alternative approach is proposed, involving a requirement that structure within the vertical separation zone be minimised. Evidence of further detailed analysis into the minimisation of encroachment into the vertical separation zone is provided in the Supplementary Structure Response prepared by Robert Bird Group (**Appendix E**) detailing how the structural support has been indicatively located within the vertical separation zone.

It is noted that the Project Review Panel has recommended to include metrics within the Design Guide for encroachment within the vertical separation zone. It is understood that the original suggestion for metrics to be included in the Western Gateway Design Guide was proposed in response to an earlier proposal to include retail, food and beverage and/or plant enclosures within the vertical separation zone. As per the revised draft Western Gateway Design Guide (**Appendix G**), 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 Project Review Panel advice is no longer considered necessary. Further, it is considered more appropriate to require any structural design in a future DA to demonstrate that the structure within this zone has been minimised to the extent reasonably possible, rather than comply with an arbitrary metric.

Outcome

Based on the above considerations, the Design Guidance Section 3.1.2 (13)(f)&(g) of the draft Western Gateway Design Guide (refer to **Appendix G**) has been amended to:

(13) 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:

...

(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 hierarchal importance of the former Parcels Post Office building

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

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

(g) be design to ensure any vertical addition to the former Parcels Post Office 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 Parcels Post Office building

4.1.5 Site-specific conservation management plans

Parties which raised this issue:

The City of Sydney

Jamie Parker MP

Members of the public

Issues raised in submissions

The City of Sydney submission recommends that one of the two independently written conservation management plans (CMP) prepared for the site (one by the Government Architect's Office and the other by TZG for TfNSW) should be adopted in order for development of the site to be considered appropriately.

Project Review Panel recommendations

The Project Review Panel recommends 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. The panel also recommends that the design guide be amended to ensure that a precinct-wide CMP be required.

Discussion and response

The Supplementary Heritage Response prepared by Urbis (refer to **Appendix B**) notes that no CMP has been adopted for Block C at this stage. Rather a Conservation Management Strategy (CMS) was submitted as part of the exhibited Block C rezoning proposal comprising a range of conservation principles that would be used to inform the preparation of a detailed Conservation Management Plan during any subsequent detailed DA stage. The CMS adopts principles established in the previous heritage management documents which remain relevant for Block C and therefore it is necessary that the assessment is undertaken against this CMS.

It is understood that reference to a CMP prepared by TZG is related to the Central Precinct Heritage Framework prepared by TZG in 2018 (later updated in June 2021). To clarify, the Central Precinct Heritage Framework is not a CMP, but was commissioned by TfNSW to assist and guide them in relation to the holistic renewal of Central Precinct. The Central Precinct Heritage Framework (TZG, 2021) is intended to inform the preparation of the precinct-wide CMP which will be considered prior to any subsequent development application(s) within Block C, in line with the recommendation made by the PRP. This will ensure any future development broadly aligns with the framework's vision, objectives and policies for the Central Precinct.

In line with the PRP's recommendation, the revised draft Design Guide has been amended to require a precinct-wide CMP to be prepared as part of the current State Significant Precinct investigations for the broader Central Precinct.

Outcome

Based on the above considerations, the Design Guidance Section 3.2.1 (9)(e) of the draft Western Gateway Design Guide (refer to **Appendix G**) has been amended to:

(9) *Development on Block C is to:*

...

- e. *address the recommendations of a 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

4.1.6 Consultation with Heritage Council

Parties which raised this issue:

Heritage NSW on behalf of the Heritage Council of NSW

The City of Sydney

Issues raised in submissions

The City of Sydney has raised concern regarding the extent of consultation with the NSW Heritage Council. The submission prepared by the Heritage NSW notes that ongoing consultation and input from Heritage NSW should be undertaken through the DA and competitive design process.

Project Review Panel recommendations

The Project Review Panel noted that further meaningful, workshop style engagement be undertaken with the NSW Heritage Council prior to the approval of a DA or competitive design brief.

Discussion and response

The importance of consultation with Heritage NSW has been acknowledged from the early stages of the project, with the process to-date having been subject to an extensive program of stakeholder engagement. Section 1.7 of the Heritage Impact Statement (HIS) submitted as part of the rezoning proposal sets out all instances of consultation undertaken prior to the submission of the rezoning proposal, including a series of meetings were undertaken with the Design Review Panel, City of Sydney Council and Heritage NSW. Specifically, it is noted that two presentations were undertaken with the Heritage NSW.

Further engagement with the Heritage NSW, amongst other key stakeholders, will be undertaken throughout the subsequent stages of the project, including any competitive design process and detailed development application stage. The HIS submitted as part of the rezoning proposal recommends the following future consultation:

- briefing to the Heritage Council (or its Delegate) immediately following the announcement of the winning design competition scheme
- coordination of a series of workshops with Heritage NSW at key stages of design development. This may include workshops for façade design, structure, public domain and heritage interpretation, conservation of building facades etc. This program is subject to development and will be guided by heritage advice
- presentation(s) to the Heritage Council
- ongoing consultation with TfNSW and the proponents of Block A and B.

The proponent commits to engage with the NSW Heritage Council in a workshop-style format if preferred by the NSW Heritage Council (at their discretion) prior to the lodgement of a DA or the comprehensive redevelopment of Block C. The draft Design Guide has been amended to include this as a requirement (refer to **Appendix G**).

Outcome

Consultation will continue to be undertaken with the Heritage NSW throughout the course of the project to ensure that the proposal maintains the significant heritage values of the former Parcels Post Office building and its context.

Based on the above considerations, the Design Guidance Section 3.2 (9)(i) of the draft Western Gateway Design Guide (refer to **Appendix G**) has been amended to:

(9) *Development on Block C is to:*

- ...
- 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.*

4.1.7 Consistency with the Central Precinct Draft Strategic Vision

Parties which raised this issue:

The National Trust

Issues raised in submission

The National Trust raise concern that the proposal is inconsistent with the expressed vision that is set out in the Central Precinct Draft Strategic Vision. It notes that the proposal is at odds with most of the visions for the Central Precinct, namely the aims to:

- 'establish a context-responsive built form approach that achieves a balanced distribution of height, density and scale'
- 'reinforce the iconic architecture of the Sydney Terminal building, former Parcels Post Office and Mortuary Station as important and defining character elements in the streetscape'.

Discussion and response

The Central Precinct Draft Strategic Vision includes a character statement and opportunities for the Western Gateway sub-precinct which underpin the overarching vision for the broader Central Precinct. Notably, the Western Gateway sub-precinct character statement envisages the sub-precinct becoming a visual marker for 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 known as Tech Central. The approved planning envelopes for Blocks A and B already seek to deliver this outcome, and with consideration of the Central Sydney tower cluster area of Haymarket, this will change the surrounding setting and character of Block C and the former Parcels Post Office building.

The proposed height, density and slender form of the indicative reference will contribute to the creation of a visual marker for the Western Gateway sub-precinct, while providing good quality publicly accessible space and connections along Henry Deane Plaza and the north-south pedestrian link. The proposal will also support employment opportunities including active ground floor uses (e.g. retail and dining) while maintaining the existing urban block pattern of the Western Gateway sub-precinct and its surroundings.

Notwithstanding the above, the indicative reference scheme also seeks to respond to its heritage context, namely through preserving the prominence and primacy of the former Parcels Post Office building through the following measures:

- a 5-10m chamfered tower setback to the northern and western edge of the former Parcels Post Office building

- a 12.6m vertical separation from the tower above
- refining massing and consideration of overall bulk and scale as well as setbacks
- consideration of materiality and façade treatments to the tower, as well as treatment of tower cores and lobbies adjacent to the heritage item (to the south and east) such as transparent materials and void spaces to ensure a significant portion of the original southern facade can be interpreted from the public domain
- ensure the original form and façades remain able to be interpreted
- minimise intervention, particularly to the intact north and western façade.

This is considered to be in line with the sub-precinct's future role as a focal point for the Central Precinct and establishes a context-responsive built form approach that achieves a balanced distribution of height, density and scale and reinforces the iconic architecture of the former Parcels Post Office building in line with the draft Central Precinct Strategic Vision (pg. 28).

Additionally, the rezoning proposal for Block C will be consistent with the opportunities outlined by the draft Strategic Vision, specifically:

- **Deliver a critical mass of employment floor space** – the rezoning proposal will support the delivery of employment floor space that will be focussed on providing new accommodation for technology related companies, with the potential to generate approximately 2,067 commercial jobs (1,270 direct jobs and 797 indirect jobs)
- **Create city centre environment that includes supporting retail** – the rezoning proposal's indicative reference scheme includes 1,000sqm of retail in the proposed tower and 2,000sqm of retail at the ground and lower ground levels of Henry Deane Plaza which will contribute to the creation of an activated city centre environment
- **Establish a visual marker for Central Precinct through the creation of city scale buildings that positively contributes to Sydney's skyline, character and public identity** – the rezoning proposal will allow for a new tower as a visual marker for the Western gateway sub-precinct and broader Central Precinct. Through a rigorous design phase during any future competitive design process and subsequent detailed DA, the proposal will positively contribute to Sydney's skyline, character and public identity
- **Interface with the City of Sydney's proposed third square** – The City's third square will remain framed by the former Parcel's Post Office Building, while the tower above will also be designed to exhibit design excellence to ensure it presents a positive interface with the proposed third square
- **Deliver generous through-site connections that allow for convenient, safe and efficient pedestrian movement** – the proposal for Block C will support the establishment of a generous north-south through-site link that will enhance connections between Central Station and Henry Deane Plaza. This will also contribute to Henry Deane Plaza becoming a convergence point for pedestrians and a high quality urban environment
- **Deliver new high-performing low-emission buildings with renewable energy** – the rezoning proposal will apply a number of ESD measures to ensure the delivery of new high-performing low-emission buildings.

Outcome

Given the above, it is considered that the rezoning proposal for Block C is consistent with the Central Precinct Draft Strategic Vision's character statement and opportunities for the Western Gateway sub-precinct and the broader vision for the Central Precinct.

4.2 Built form

4.2.1 Height, scale, and density

Parties which raised this issue:

Heritage NSW

Members of the public

Issues raised in submissions

The Heritage NSW's submission acknowledges that the significant increases in height and GFA and considers that this will impact the ability for the proposal to appropriately respond to the landmark qualities of the site and the surrounding heritage rich context. The community submissions have raised concern with the bulk and scale of the proposal, noting that this increase in height and GFA will detract from the heritage items.

Project Review Panel recommendations

The Project Review Panel recommends that the RtS include scale plans comprising the area of the maximum envelope and the proportion that the 1300sqm GBA floor plate occupies. Furthermore, the Project Review Panel recommends the following amendments to the Western Gateway Design Guide:

- reference to the need for flexibility within the 1,300sqm GBA floorplate to ensure the design excellence process can achieve suitable outcomes
- include a reference to the key metric of 41,000sqm maximum tower and to include the requirement that void areas should not be deducted from GFA calculations (consistent with previous DRP advice) intervention, particularly to the intact southern façade.

Discussion and response

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

Consistent with the Central Sydney Planning Strategy, the Western Gateway sub-precinct character statement of the Central Precinct Draft Strategic Vision envisages the sub-precinct becoming a visual marker for Central Precinct through the inclusion of city-scale buildings that create a focal point for the innovation and technology hub. The rezoning proposal for Block C seeks to facilitate the provision of a tower form that will contribute to the establishment of a visual marker for the Western Gateway sub-precinct with the proposed built form on Block C being a slender form acting as a foil against the background massing of Block A and Block B.

Given the changes to the urban landscape that is proposed to occur in the Western Gateway sub-precinct and the broader Central Precinct, open sky views will in some instances be more reflective of a CBD environment. As such, the proposed building envelopes and density on Block C is considered contextually appropriate.

That said, the maximum planning envelopes for Block C have been informed by detailed analysis of site-specific opportunities and constraints, technology and innovation tenant requirements, and based on the overall development objectives for the Western Gateway sub-precinct. In addition, the indicative reference scheme has been extensively considered throughout the DRP process with several factors including the relationship with the former Parcels Post Office building and other significant heritage items within the Central Precinct shaping the proposed maximum building envelope and setback controls of the draft Western Gateway Design Guide (refer to **Appendix G**).

The Supplementary Design Report prepared by FJMT (refer to **Appendix A**) includes additional scaled plans that address the Project Review Panel's recommendation for scale plans including the area of the maximum envelope and the proportion that the 1,300sqm gross building area (GBA) floorplate occupies. This illustrates the flexibility within the planning envelope to achieve a 1,300sqm GBA floorplate and allow for architectural variation and alternative core and structural solutions subject to the completion of an Architectural Design Competition for Block C. It is anticipated that the competitive design process will require 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 revised draft Western Gateway Design Guide (refer to **Appendix G**).

Regarding the PRP's recommendation for the revised draft Western Gateway Design Guide to include the requirement that void areas should not be deducted from GFA calculations, GFA is to be calculated in accordance with the definition of the relevant environmental planning instrument (i.e. the Sydney LEP 2012). Given the Design Guide is a subordinate document to the Sydney LEP 2012, the method for calculating GFA on Block C must be consistent with the provisions of Sydney LEP 2012 which permits the exclusion of voids from the calculation of GFA. Further, it is noted that this approach is consistent with that used for Block A and B within the sub-precinct. This recommendation from the Project Review Panel is therefore not supported. Notwithstanding, it is noted that bulk and scale of the building is mitigated through other design criteria and controls, including:

- 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 Office building
- objectives for view and visual impacts
- a maximum GFA control for the site.

Notwithstanding the above, the draft Western Gateway Design Guide (refer to **Appendix G**) has been amended to outline a maximum 41,000sqm gross floor area within the tower envelope on Block C (including the former Parcels Post building). For clarity purposes, the proposed total gross floor area for Block C remains 43,000sqm as outlined in the exhibited EIE and SEPP Report, which includes 2,000sqm of additional floor space to be located in the lower ground and ground-level parts of Henry Deane Plaza.

Outcome

Based on the above considerations, the Design Guidance 3.1.2 (13) of the draft Western Gateway Design Guide (refer to **Appendix G**) has been amended to:

(13) 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 1,300 sqm 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

...

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.

4.2.2 Building setbacks and separation

Parties which raised this issue:

Heritage NSW

The Consortium (proponent of Block B of the Western Gateway sub-precinct)

Members of the public

Issues raised in submissions

The Heritage NSW submission outlines that the proposed tower envelope requires a larger setback than the adopted 5-10m minimum tower setback from the northern and western façades. It notes that this is necessary in order to preserve the integrity of views to the heritage significance of the former Parcels Post Office building. The submission from Heritage NSW welcomes detailed design to achieve this outcome.

The Consortium (proponent of Block B of the Western Gateway sub-precinct) is of the view that any built form landing on Henry Deane Plaza should be limited to lightweight structural elements. Community submissions also noted that the proposal provides inadequate building separation of 12m from Atlassian's proposed tower development contained in Block A.

Project Review Panel recommendations

The Project Review Panel recommends that the RtS:

- 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 south-west corners of the former Parcels Post Office building (without reducing the 21m between the north-west corner and the chamfer).

Discussion and response

The setbacks that were adopted for the proposed development were informed by four State Design Review Panel sessions in 2020, with the primary focus being to ensure the prominence of the former Parcels Post Office building is retained.

In response to Heritage NSW's submission requesting consideration of additional setbacks behind the full extent of the northern and western facades, a Supplementary Design Report prepared by FJMT (**Appendix A**) provides additional setback analysis to address the recommendation of the Project Review Panel. The setback analysis provided by FJMT at Appendix G compares alternative setback controls based on the existing provisions of the Sydney DCP 2012 and the proposed setback controls of the revised draft Western Gateway Design Guide (refer to **Appendix G**). It demonstrates that to adopt the setbacks of the Sydney DCP 2012 at the north-eastern and south-western corners of the former Parcels Post Office building 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. The analysis on these setbacks further discussed below.

Northern and western setbacks

The 5-10m setbacks adopted at the north and west façades was derived through an assessment of the appropriate setback distance required to preserve the primacy of the former Parcels Post Office building when viewed from key public view corridors.

Following the receipt of submissions, the proponent has undertaken further testing and analysis of the proposed northern and western setbacks with the 10m setback requirements set out in the Sydney DCP 2012. An extract of that comparison is provided at **Figure 5** (next page) demonstrating the increased setback from 14 metres to 21 metres from the north-west corner of the former Parcels Post Office building, which will better preserve the primacy of the heritage building.

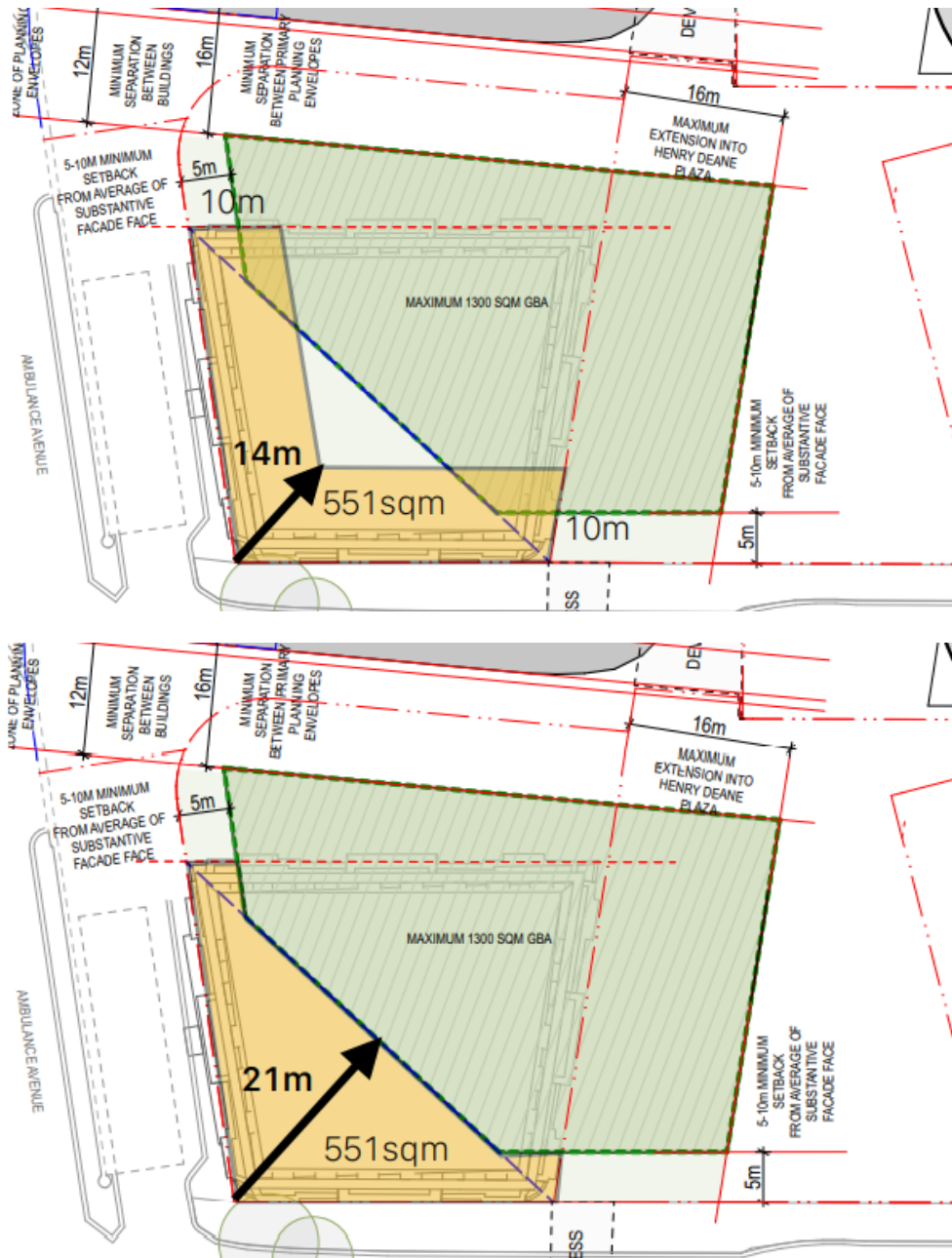


Figure 5. Comparison of north-east corner upper level setback between reference scheme and 10m setback requirement set out in the Sydney DCP 2012

Source: FJMT

As illustrated by **Figure 5**, when comparing the proposed setbacks to a DCP compliant 10m setback from the north and west facades (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 difference between the two is evident in the very north east and south west corners of the heritage building, where a small area of encroachment within the 10m occurs for a section of the northern and western facades.

While the proposed solution does have some encroachment within the suggested 10m setback area, it is noted however that the proposed setbacks enable a greater setback from the north west corner of the former Parcels Post Office building, which allows for a greater visual curtilage to the most visually prominent part of the heritage building. The chamfered setback also supports additional view sharing towards the Central Station

Clocktower in addition to supporting the prominence of the former Parcels Post Office building from key view corridors. Importantly, the proposed setback design also enables a more usable and logical floor plate that provides for improved wind mitigation and which maintains view corridors from south west of the site to Central Railway Station. Given these factors it is considered that the proposed setbacks from the north and western façades represent a more appropriate design solution to potential alternatives.

It is worth noting that a design solution focused on maintaining the chamfered north-west façade and increasing the north and west setbacks to 10m was considered in addition to the above. This option has however been discounted as this design solution resulted in a tower floorplate of 850sqm Net Lettable Area (NLA), which in turn meant that the building would not achieve the spatial requirements required to provide the A-grade commercial space (minimum 1,000sqm NLA¹) that is needed for a new office building in this location. It is also important to recognise the need for new, high-quality office space within Central Sydney will continue over the next decade and tenants are increasingly demanding buildings with larger floor plates of beyond 2,000sqm to support their business needs. This is particularly the case when seeking to accommodate tenants in the tech and innovation sector.

Due to the relatively constrained site dimensions for Block C and the intended aim of retaining the prominence of the former Parcels Post Office building through the proposed 5-10m northern and western setback, and a diagonal setback from the north-west point of the former Parcels Post Office building, the maximum Gross Building Area (GBA) of the proposed building envelope is already restricted to 1,300sqm. To adopt the potential increase in setback would therefore not only undermine the ability of schemes to achieve the key requirements of the project, but would also remove any flexibility in the planning envelope for future design refinement. The alternative would be contrary to the advice provided by the SDRP. Further, reduction of the floorplate sizes will diminish the attractiveness of the building to future tech tenants. This would in turn effectively undermine the draft Central Strategic Vision's desired future character for the Western Gateway sub-precinct to be a visual marker for Central Precinct through city-scale buildings that creates a focal point for the innovation and technology hub.

Eastern setback and building separation to Block A

The draft Western Gateway Design Guide proposes a minimum 12m building separation between the future towers located on Block A and Block C. By comparison it is noted that this exceeds 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.

Notwithstanding the above, amenity impacts associated with the detailed design of any future building on Block C and the future buildings on Blocks A and B, such as visual privacy, overshadowing and the pedestrian wind environment, will be documented and assessed against the relevant objectives and guidance outlined by the draft Western Gateway Design Guide.

While this will be articulated through the future development application process, technical studies supporting the rezoning proposal for Block C has demonstrated that any adverse impacts associated with the proposed building separation can be mitigated to an acceptable level through detailed design.

Southern setback

The Consortium (proponent of Block B of the Western Gateway sub-precinct) has raised that any built form landing on Henry Deane Plaza to the south of the former Parcels Post

¹ Property Council of Australia – Office quality grade matrix

Office building should be limited to lightweight structural elements or lightweight columns only (i.e. avoiding building cores such as lifts, stairs or services).

It is recognised that there are a number of different structural solutions and architectural styles that may be viable to support the envelope identified and achieve the shared vision for a redeveloped and reimagined Henry Deane Plaza. However, at this stage of the planning process, 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 a future competitive design process to determine the most appropriate location for core elements.

Notwithstanding, it is acknowledged that maintaining safe and functional pedestrian movement and circulation through the Western Gateway sub-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 broader Central Precinct. A 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 the proposal for Block C.

Furthermore, architectural detailing of any structural elements interfacing with the heritage items and adjacent public domain will be required to take an informed and strategic approach to design including consideration of form, colour, materials, and details and respond to the immediate context and character. A key objective of this will be to ensure that any proposed structural elements interfacing with Henry Deane Plaza will seamlessly integrate with the public domain.

Outcome

Based on the above considerations, the Design Guidance 3.2.1(6) of the draft Western Gateway Design Guide (refer to **Appendix G**) has been amended to:

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

4.3 Movement, access, and public spaces

4.3.1 Vehicular transport issues

Parties which raised this issue:

The City of Sydney

The Consortium (proponent of Block B of the Western Gateway sub-precinct)

Issues raised in submissions

The City of Sydney submission raises concerns with the transport approach, specifically the lack of details surrounding vehicle numbers. It also notes that car parking should not be provided on site, given its convenient access to public transport.

The Consortium affirm that the proposal requires the completion of a traffic assessment, noting that proposed servicing arrangements via Block B are subject to the proponent reaching commercial agreement with the Consortium.

Discussion and response

The exhibited rezoning package for Block C contained a Transport Assessment, which outlined the approach to managing traffic impacts, servicing, car parking, staging and managing pedestrian and vehicular access. Transport for NSW consider that this report appropriately outlines the overall approach to traffic management for the purposes of the rezoning stage for Block C of the Western Gateway sub-precinct. Whilst this is the case, a further detailed assessment of vehicle numbers has been provided in a Supplementary Transport Assessment prepared by GTA Consultants, included at **Appendix D**. This details service vehicle number size and loading dock management, as well as coach/bus drop off/pick up.

The Sydney LEP 2012 parking rates are proposed to remain applicable to Block C as part of this rezoning proposal. This will apply maximum car parking rates to Block C and importantly are lower compared to other CBD locations across metropolitan Sydney, which is appropriate given its level of accessibility. This will also be consistent with the car parking rates that will apply to Blocks A and B of the Western Gateway sub-precinct, which was recently rezoned in August 2020.

Toga (the proponent for Block C) will continue to work with the Consortium to agree on the consolidated access and servicing arrangements through Block B as part of ongoing design development and future DAs. The applicant has also considered interim access arrangements via the existing Right of Way to facilitate access for Blocks A and C in the event that Block B is not delivered, whilst enabling delivery of the future Central Walk West. This has been undertaken in consultation with Atlassian (proponent of Block A).

Outcome

Given the above consideration, no change is proposed to the rezoning proposal. The final design and arrangement of vehicles will be detailed as part of any future development application for Block C.

4.3.2 Pedestrian movement, open space and public domain

Parties which raised this issue:

The City of Sydney

The University of Technology Sydney

The Consortium

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

Members of the public

Issues raised in submissions

The City of Sydney's submission raises concerns that the proponents have not coordinated the urban design strategy for Central Precinct with the City of Sydney and recommends that this be undertaken in collaboration with the City. The City of Sydney and community submissions also suggested that the proposal should prioritise the inclusion of ground level open air connections, instead of underground and above ground connections. Community submissions also noted that the proposal should seek to improve pedestrian amenity through widened footpaths, green canopy and traffic reducing mechanisms which respond to the increased density arising from the proposal.

UTS have raised the need to prioritise improved pedestrian connectivity both within and surrounding the Western Gateway sub-precinct and the need for the Goods Line to be extended through to Mortuary Station.

The Action for Public Transport (N.S.W) Inc submission acknowledges the capacity problems of the Devonshire Street tunnel and suggests that Central Walk be extended westwards to reduce the walking distances between Railway Square and trains.

Project Review Panel recommendations

The Project Review Panel recommends the RtS be updated to demonstrate appropriate justification of the proposed pedestrian network and include any modelling or outcomes used to inform the proposal. The Panel also recommend the Publicly Accessible Space Strategy be updated to include:

- 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)
- 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
- recommendation that any vertical circulation requiring lifts in the public domain be embedded into the adjacent built form.

Discussion and response

Whilst it is acknowledged that existing pedestrian conditions present challenges for many, the proposed Western Gateway Rezoning Proposal will not hinder the delivery of broader pedestrian connections for Central Precinct but is in fact aimed at facilitating the improvement of existing connections and creation of new connections once the broader Precinct is redeveloped.

TfNSW disagree with the City of Sydney's suggestion that no collaboration has been attempted for a coordinated urban design strategy for the Central Precinct, including the Western Gateway. The design and planning process for the Central Precinct SSP (which includes the Western Gateway sub-precinct) is still in its early stages, and consultation and collaboration on this work has been ongoing with not only the City of Sydney, but other key stakeholders, including DPIE, the Heritage Council and the Government Architect of NSW. This collaborative process will continue throughout the Central Precinct Renewal project.

Notwithstanding the above, an updated Publicly Accessible Space Strategy (refer to **Appendix H**) has been prepared to establish a framework for the renewal of the public domain in the Western Gateway sub-precinct, as part of broader changes occurring in the Central Station Precinct. The Publicly Accessible Space Strategy employs a number of public domain design principles which align with the overarching objectives of the City of Sydney and largely address the items raised by submissions. These principles include:

- prioritise people
- a vibrant precinct
- intuitive movement
- a green precinct
- celebrate heritage.

Details relating to these principles is provided in the Publicly Accessible Space Strategy at **Appendix H**.

To ensure the principles and guidelines of the Publicly Accessible Space Strategy are met, a detailed public domain plan will be required as part of any future development application in the Western Gateway sub-precinct (including Block C) to demonstrate how each proposal has been designed to deliver a high quality, co-ordinated public domain consistent with the vision and principles contained within the Publicly Accessible Space Strategy. Furthermore, pedestrian modelling will also be undertaken for the broader Central SSP planning investigations, which will include pedestrian analysis at development and station access/egress points, at intersections with the road network along key desire lines, including those through the Western Gateway sub-precinct.

Further, in response to the PRP's recommendations, the Publicly Accessible Space Strategy has been updated to include:

- 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
- 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
- recommendation that any vertical circulation requiring lifts in the public domain be embedded into the adjacent built form.

In relation to the pedestrian movements through the Western Gateway sub-precinct, it is important to recognise that the proposal for Block C is enhancing the pedestrian connectivity by providing an expanded north-south pedestrian link between Block A and Block C (the link zone). Currently this area does not provide a direct public pedestrian thoroughfare between Henry Deane Plaza and the Western Forecourt of Central Station. This future link will not only connect the Western Gateway sub-precinct and the Devonshire Street Tunnel to the Western Forecourt but would also support additional pedestrian connectivity to the City of Sydney's vision for a Central Square north of the Western Gateway sub-precinct and Central Walk West (subject to future funding).

Responding to the Project Review Panel's recommendation to provide justification of the pedestrian network, TfNSW has undertaken a preliminary assessment to understand the pedestrian movements and capacity around the Western Gateway, which includes the Block C proposal. The assessment was informed by:

- Opal and ROAM data provided by TfNSW for 2018 and 2019, including touch on and touch off data at each gate line by time of day provided, and details of interchanges between buses, light rail and trains. This was used to establish a 2019 AM Origin-Destination (OD) movement matrix.
- The Public Transport Project Model and Sydney Travel Model which were used to identify the growth and distribution of each mode, mode-to-mode transfers, and distribute trips to the external zones.
- Information from previous studies, including the Sydney Metro Business Case and the Central Station Footprint Business Case.
- The proposed yields on Blocks A, B and C in the Western Gateway sub-precinct, which were used to establish the trip generation, including movements from trains, buses, light rail and walking only trips.
- Pedestrian count data collected in 2017 and 2019.
- Pedestrian Planning Report prepared by Arup as part of the Central Place Sydney USP Stage 2 Submission.
- The following assumptions and criteria:
 - The western entrance of Central Walk is constructed by 2036

- The new Metro services on platforms 26 and 27 are in operation by 2026
- There would be minimal changes to the road and external pedestrian network (no alterations to George and Lee Streets). At the time of assessment, the design of the precinct had not yet been established to a point where changes to the road network could be highlighted.
- The Level of Service of the new Link Zone between Block A and Block C must achieve at least a Level of Service (LoS) C for interchange movements (no more than 49 pedestrians per minute per metre).

Furthermore, the assumed pedestrian routes considered the likely destinations for pedestrians travelling to and from Central Walk West and the Devonshire Tunnel/ Henry Deane Plaza. This included:

- All demand associated with the Western Gateway would exit the station via Central Walk West and travel to their end destination via the Link zone.
- All demand travelling towards the Goods Line and UTS would exit the station via Central Walk West and travel to their end destination via the Link zone and the lower level of Henry Deane Plaza.
- Pedestrians travelling towards the intersection of Broadway and Harris Street and Railway Square would be split between:
 - the crossing at the intersection of George/ Lee/ Pitt Streets
 - walking across the public domain, around the north-west corner of the Block C to the Lee Street signalised crossing
 - using the link zone to access the Lee Street signalised crossing
- Some level of interchange movement between buses and trains would move through the Link Zone to access the Station via Central Walk West, or bus services at Railway Square.

Due to the anticipated convergence of pedestrians travelling to and from the Devonshire Street tunnel, and the potential Central Walk West entrance at Central Station, the link is identified as a key thoroughfare for consideration for the Western Gateway sub-precinct. Of note is that the narrowest part of the link zone is located between Blocks A and C, which will need to provide a satisfactory level of service to support future pedestrian movement along this route. The assessment undertaken found that a Level of Service C (interchange) is achievable across the north-south through-site link between Block A and Block C when applying a series of post-development assumptions, scenarios and routes.

It is recognised that any additional changes to the public domain will impact pedestrian routing decisions, with demands along the north-south through-site link likely to fluctuate over time. However, the 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. It is noted that further pedestrian modelling will continue to be undertaken through as part of the State Significant Precinct investigations for the broader Central Precinct and as part of any future detailed DA for Block C.

Outcome

Any future public domain plans prepared as part of a subsequent detailed DAs in the Western Gateway sub-precinct will need to demonstrate its consistency with the Publicly Accessible Space Strategy included at **Appendix H**.

Further pedestrian modelling will continue to be undertaken through as part of the State Significant Precinct investigations for the broader Central Precinct and as part of a future detailed DA for Block C.

4.4 Amenity

4.4.1 Overshadowing

Parties which raised this issue:

The National Trust

Members of the public

Issues raised in submissions

The National Trust note that they consider the proposal to constitute poor urban design, as it includes a new tower that overhangs a unique historic building and overshadows a public area.

Furthermore, the community submissions raise that the proposal should ensure that there is no overshadowing of Prince Alfred Park at any time as this would affect natural growth of vegetation, animal life and public enjoyment of this park. The overshadowing rules only apply up to 2:00pm on any day and given the proposal's positioning to the west of the park, any overshadowing would be likely to occur after that time.

Discussion and response

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

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

The proposal for Block C has considered the sun access protection provisions of the Draft CSPS to inform the proposed building envelopes and proposed amendment to building height provisions. The proposal does not result in any overshadowing of Prince Alfred Park between 10.00am and 2.00pm. This is demonstrated through the shadow studies and analysis included within the Urban Design Report exhibited with the proposal.

Outcome

Given the above consideration, no change is proposed to the rezoning proposal. The proposal will not result in overshadowing impacts to Prince Alfred Park that are inconsistent with the controls set out in the Sydney LEP 2012 or the draft CSPS. Prince Alfred Park will continue to get sun access all year round and therefore no amendment to the proposal is considered necessary from an overshadowing perspective.

4.4.2 Wind and microclimate impacts

Parties which raised this issue:

The City of Sydney

Members of the public

The Consortium

Issues raised in submissions

The City of Sydney raised concern that the proposal may result in unacceptable microclimatic impacts on the adjacent future square. It raises that wind comfort criteria should be established in accordance with the City of Sydney's previous advice issued with its previous submission on the Draft Design Guideline. It recommends the following wind standards be adopted:

- walking through the OSD connection and footpaths – 8 m/s
- standing at building entrances, bus stops – 6 m/s
- siting in future public spaces – 4 m/s.

Furthermore, the City of Sydney raises that unlike Blocks A and B, where the City of Sydney recommended that the impact of wind should be mitigated through massing and not canopy structures, the scale of the Block C tower proposal necessitates canopy structures to be used for wind mitigation. The City of Sydney also recommends that wind tunnel testing be undertaken on the proposed envelope and not the reference design.

Despite the above, the Consortium contends that Block C should be required to complete wind modelling and assessment in the same manner as Blocks A and B to ensure the wind comfort criteria for Blocks A and B are not compromised. This is requested as it would ensure the criteria are correct for the intended purposes across Henry Deane Plaza and the remainder of the public domain.

Project Review Panel recommendations

The PRP noted its previous advice regarding the need for the Western Gateway design guide to be finalised and submitted with the RTS. The PRP also noted the proposal results in significant wind issues with the comfort criteria of two locations are reduced from 'walking' to 'uncomfortable'. The PRP also recommended:

- 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 (refer to the wind comfort criteria noted in the schedule attached to the PRP's July 2020 advice).
- 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.

Discussion and response

A Supplementary Wind Impact Assessment has been prepared by RWDI (the same consultant for all three Blocks within the precinct) based on the latest detailed designs for Blocks A and B (refer to **Appendix C**). This assessment assesses the proposal for Block C in light of the submissions received about wind and microclimate impacts. It is noted that the revised draft Western Gateway Design Guide (refer to **Appendix G**) now includes a wind comfort criteria map for the Western Gateway sub-precinct. The proposed wind comfort criteria map has been informed by an extensive consultation process with DPIE and the City of Sydney Council. Any future detailed Development Application for Block C will be required to demonstrate it is capable of retaining comfortable wind conditions for users of the public domain based on this criteria.

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 based on the latest detailed designs for Blocks A and B (refer to **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 Central Square to the north of Block C 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 Block C are noted to improve such that they will satisfy the safety criterion.

South of the proposed building, four locations within Henry Deane 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 Western Gateway sub-precinct. Two locations in Henry Deane 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. It is expected that 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.

As the Western Gateway Design Guide will include a wind criteria map which is to be addressed in any future development application for Block C. At this stage of the planning process, the rezoning proposal has demonstrated that this criterion can generally be achieved within the proposed planning envelopes, however further measures will be required to mitigate two locations which will be explored further as part of competitive design process prior to submitting a detailed development application.

Outcome

Given the above consideration, no change is proposed to the rezoning proposal. The draft Western Gateway Design Guide (refer to **Appendix G**) will include a wind criteria map that is to be addressed as part of any future development application in the Western Gateway sub-precinct (incl. for Block C), as determined appropriate by DPIE.

4.4.3 Visual and view impacts

Parties which raised this issue:

Heritage NSW

The National Trust

Jamie Parker MP

Members of the public

Issues raised in submissions

Heritage NSW understands that the maximum building height of the proposal will enable development that visually impacts the former Parcels Post Office building, with the new development unlikely to retain the predominant scale, density and grain of the existing

built environment and context of the State Heritage listed sites. Heritage NSW note that the 5-10 metre minimum setback from the northern and western façades of the tower envelope will result in a built form outcome that will impact the building's landmark qualities when viewed from Lee Street. It therefore recommends that a larger setback be adopted at the northern and western façades to preserve the integrity of views to the building, with Heritage NSW supportive of this being addressed through detailed design of the Block C proposal.

Heritage NSW also raised that the proposal extends 16 metres into Henry Deane Plaza and that this causes an impact on the prominence of Marcus Clarke Tower when viewed from the east-west connection across Central Precinct.

The National Trust and community submissions identify that the photomontages incorporated into the Visual Assessment Report have selectively adopted views that do not demonstrate the true impact of the proposal on the former Parcels Post Office building. A photomontage from an angle that is already obscured by trees is adopted. The National Trust recommend that a more useful photomontage assessing the visual impact from Railway Square or the Devonshire Street tunnel be included.

Jamie Parker MP's submission notes that towers on top of and beside historic buildings will be detrimental to views. The community submissions add that the former Parcels Post Office building will be dwarfed by the tower forms proposed in Block A and C, when viewed from Belmore Park and that the location is inappropriate for such a proposal.

Project Review Panel recommendations

The Project Review Panel recommends the RtS be amended to ensure diagrams and commentary are based on the planning envelope, not the reference scheme. The panel also recommends the following amendments to the Western Gateway Design Guide:

- promote the use of materials or other measures such as transparent materials, void spaces at lower levels, (adjacent to the eastern and southern façades) to ensure the original façades can be interpreted
- measures to ensure compliance with the DRP's previous advice that the southern extension of the envelope be as far as possible not enclosed.

Discussion and response

The views included within the Visual Impact Assessment as part of the rezoning proposal for Block C are the key views nominated within the Central Sydney Planning Strategy as well as additional views from Railway Square and Lee Street. The Supplementary Design Report prepared by FJMT (**Appendix A**) also includes additional imagery illustrating how the envelope and reference massing has been designed to preserve the primacy of the heritage building at the key intersection of Lee St, Pitt St, George St, Quay St and Broadway. Notably, significant views identified in the Sydney DCP 2012 (Special Character Areas 2.1.11- Railway Square/Central Station Special Character Area) have been included in the analysis of view impacts and determination of urban form envelope and setbacks. Additional views were also determined in consultation with the Project Review Panel (Meeting November 2020) and included consideration of the view impacts to the Central Station clocktower from Railway Square and Lee Street.

The proposed upper-level setback of the tower form seeks to retain views and vistas where appropriate and achieves this through the horizontal and vertical 'transition zone' that sits between the former Parcels Post Office building and the tower above. 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 the Central Precinct Renewal.

The assessment that was conducted in the Visual Assessment Report submitted as part of the rezoning proposal analysed the view impacts within the context of the approved tall buildings for Blocks A and B of the Western Gateway, the future development vision for Central Precinct, and the future towers anticipated within the City of Sydney 'Tower Cluster'. Within this context, the impact of the proposed Block C envelope is considered acceptable.

With regards to the proposed extension of the building envelope into Henry Deane Plaza by 16m it is noted that the location of the envelope coupled with the proposal for a significant void space (i.e. between the southern façade of the former Parcels Post Building and the proposed southern core) will allow for a filtered view from the future connection the over station development (OSD) stairs to the Marcus Clark building. The proponent for Block C is committed to exploring opportunities to emphasise and accentuate this connection where possible through a competitive design process for the detailed design of the tower. This is reinforced through additional design guidance for Block C (as recommended by the PRP) that responds to the proposed view corridor 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, this requires 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.

Concerning the recommendation by the Project Review Panel on the use of planning envelopes, it is noted that 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 this RtS package and all the appendices. It is noted that due to the maximum GFA control proposed for Block C coupled with the maximum floorplate GBA permitted in the revised draft Western Gateway Design Guide (refer to **Appendix G**), that the maximum planning envelope cannot be completely filled by a detailed design for the development.

Outcome

Based on the above considerations, the Design Guidance 3.2.1(9) of the draft Western Gateway Design Guide (refer to **Appendix G**) has been amended to:

(9) *Development on Block C is 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*

4.5 Sustainability

Parties which raised this issue:

The City of Sydney

Issues raised in submissions

The City of Sydney raises concerns surrounding the lack of integrated precinct-based ESD measures for the developments encompassed within the Western Gateway sub-precinct. It also recommends that the application of specific sustainability rating targets and benchmarks to the proposal.

The community submissions raise that the construction of the proposed tower form will result in a significant amount of building materials and energy being expended that is arguably unnecessary given the COVID-19 pandemic.

Project Review Panel recommendations

The Project Review Panel recommends that the Western Gateway Design Guide be finalised and submitted with the RtS and previous advice of the panel be addressed.

Discussion and response

Future development situated within Block C of the Western Gateway sub-precinct will be subject to adhering to a high standard of sustainability targets that are outlined in the Western Gateway Design Guide (refer to **Appendix G**). These targets will also apply to development within Blocks A and B of the Western Gateway sub-precinct, therefore providing integrated precinct-based sustainability targets.

The proposed planning framework allows for flexibility with regard to the approach to achieving these targets. Following the completion of an Architectural Design Competition the proposed solution to achieving its target of 6 Star Green Star rating in detailed as part of any subsequent detailed Development Application.

The Western Gateway Design Guide will be updated with the criteria for sustainability as determined to be appropriate by DPIE.

Outcome

Given the above consideration, no change is proposed to the rezoning proposal.

4.6 Responding to the COVID-19 pandemic

Parties which raised this issue:

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

Members of the public

Issues raised in submissions

The Action for Public Transport (N.S.W.) Inc submission notes that the proposal should include details on assumptions that are being made about COVID-19 and should indicate the effects on the proposal if these assumptions prove to be inaccurate. For example, detail on the implications on the proposal if working from home remains as common as it was in 2020.

The community submissions raise that high rise buildings are challenging in the context of the COVID-19 pandemic and the associated social distancing rules. Furthermore, the community note that working from home is common especially in relation to jobs concerned with technology, reducing the need for more office, retail or hotel space.

Discussion and response

It is acknowledged that the COVID-19 pandemic has had an impact on the way we work, however it is important that NSW continues to plan for a return to normalcy as the recovery progresses and widespread vaccination of the population is achieved. Sydney is the economic hub of Australia and it is therefore critical that the Sydney Innovation and Technology Precinct comes to fruition, with the Block C development within the Western Gateway being a key factor galvanising the development of this precinct. This will help in

attracting and retaining the best skilled technology talent and contribute to the recovery of Sydney following the pandemic.

In doing so, the intention is for people to return to working from office space, be it permanently or on a rotational basis with working from home. Accordingly, commercial office space will be essential. Hotel space will also be required to enable post-pandemic Sydney to capitalise on the tourism industry following its revival, by providing hotel space in a prime Central Sydney location. Retail space will also continue to be required to help with the activation of the ground plane and to service the commercial tenancies contained within the Western Gateway.

The post COVID-19 world will be a key consideration of any future building design which would form part of a subsequent 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 reduce the risk of virus transfer. Additionally, while it is critical that office space be provided following the pandemic, the delivery of substantial high-quality office space during the pandemic would be significantly beneficial. This would enable companies to return to offices during a pandemic context while adhering to social distancing requirements.

Outcome

Given the above consideration, no change is proposed to the rezoning proposal.

5 The revised proposal

Based on the feedback received during the public exhibition of the Western Gateway (Block C) rezoning proposal, a revised proposal has been submitted for DPIE's consideration as part of its assessment. While the indicative reference scheme has not been amended, further work supporting the rezoning proposal and refinements to the proposed planning framework have been made.

5.1 Revised Publicly Accessible Space Strategy for the Western Gateway

A revised Publicly Accessible Space Strategy (PASS) has been prepared to establish a framework for the renewal of the public domain in the Western Gateway sub-precinct, as part of broader changes occurring in the Central Station Precinct (see **Appendix H**). The PASS employs a number of public domain directions and design principles, and establishes the hierarchy of movement and places within the sub-precinct with a strategy to support the creation of an active development integrated into the wider precinct and city.

The PASS aligns with the objectives and design guidance set out within the draft Western Gateway Design Guide and will guide the future design of the public domain within the Western Gateway sub-precinct and its integration with the plans for a Central Square at the Western Forecourt and Railway Square. This has been prepared in consultation with key stakeholders, including the proponents for Blocks A, B and C to ensure that future redevelopment of the sub-precinct is supported by a high quality, activated public domain that creates opportunities for conversation and collaboration, transit and relaxation.

An overview of the key elements of the PASS is described below.

Upper level

The upper level of the public domain in the Western Gateway sub-precinct will be a relatively small but important public space within the precinct. It will act as the primary entry level to the commercial buildings in the Tech Central precinct and will be activated along its edges through foyer and retail uses.

Henry Deane Plaza is envisaged to consist of level areas for public use, entry zones, sloping spaces, stair and lift connections up from the Lee Street level which has relatively significant falls of three to four metres from the south to north. This will be connected down to the lower movement level and will establish a key link to any potential OSD level of the broader Central Precinct through a major civic stairway. This stairway will be constructed in the event of the OSD level being built (refer to **Figure 6**). As an interim, that stair space will be occupied by a Terrace Pavilion, a programmable space that will help to activate the plaza with a variety of uses.

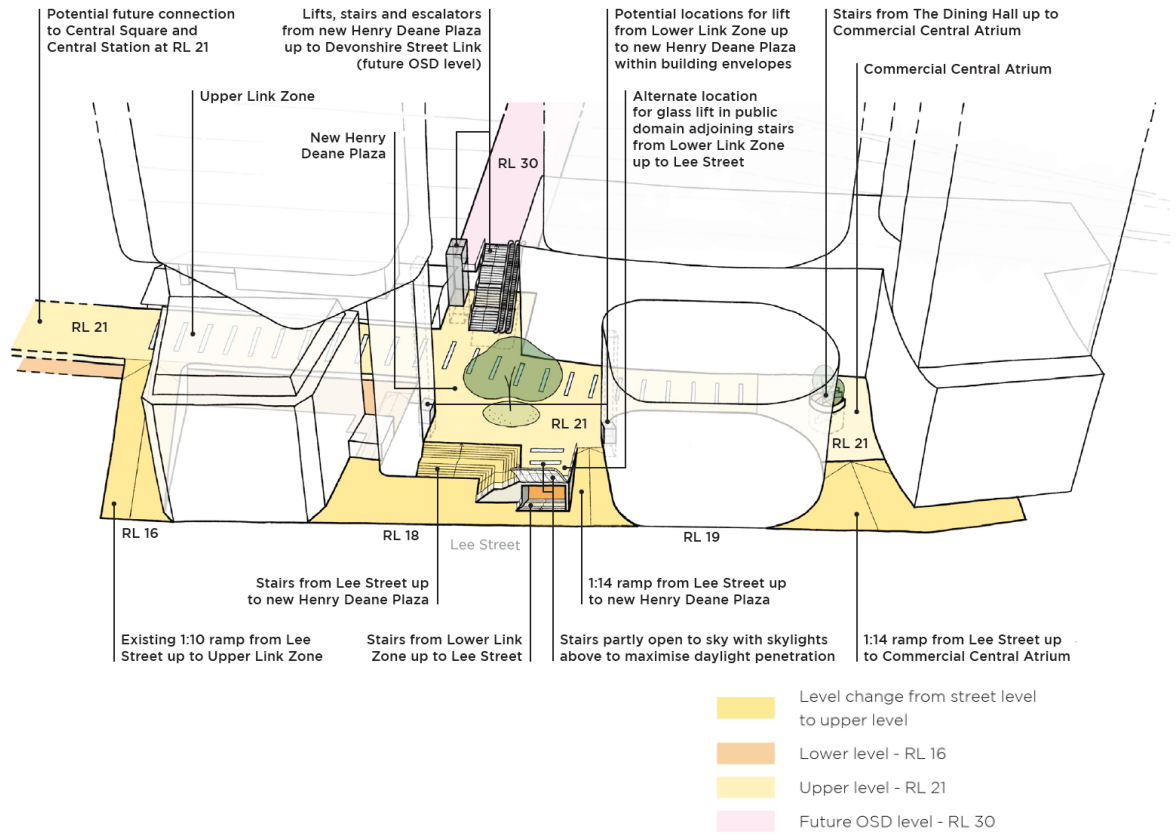


Figure 6. Indicative upper level publicly accessible space vertical connections

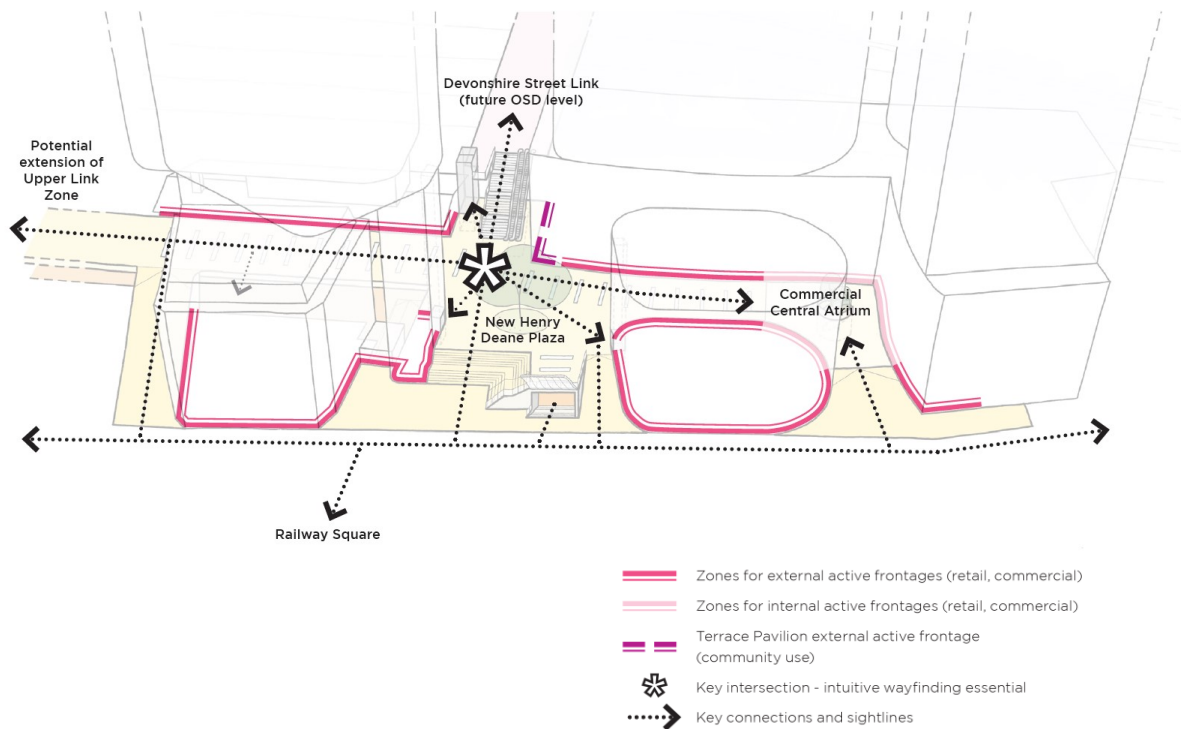


Figure 7. Indicative upper level publicly accessible space sightlines and activation

Lower level

The lower level of the public domain in the Western Gateway sub-precinct will largely be a movement and connection space, along with a role as a retail market-place. This will aim to service both the commuters and travellers moving through the space and the workers, students and locals from the Tech Central Precinct and adjacent areas (refer to **Figure 8** and **Figure 9**).

Wayfinding will be important in ensuring movement into and through the precinct will be intuitive, including the use of daylight to the lower level and ensuring appropriate uses located on the edges of the key spaces. Clear connections will be made up to street level and to transport system tunnels and spaces.

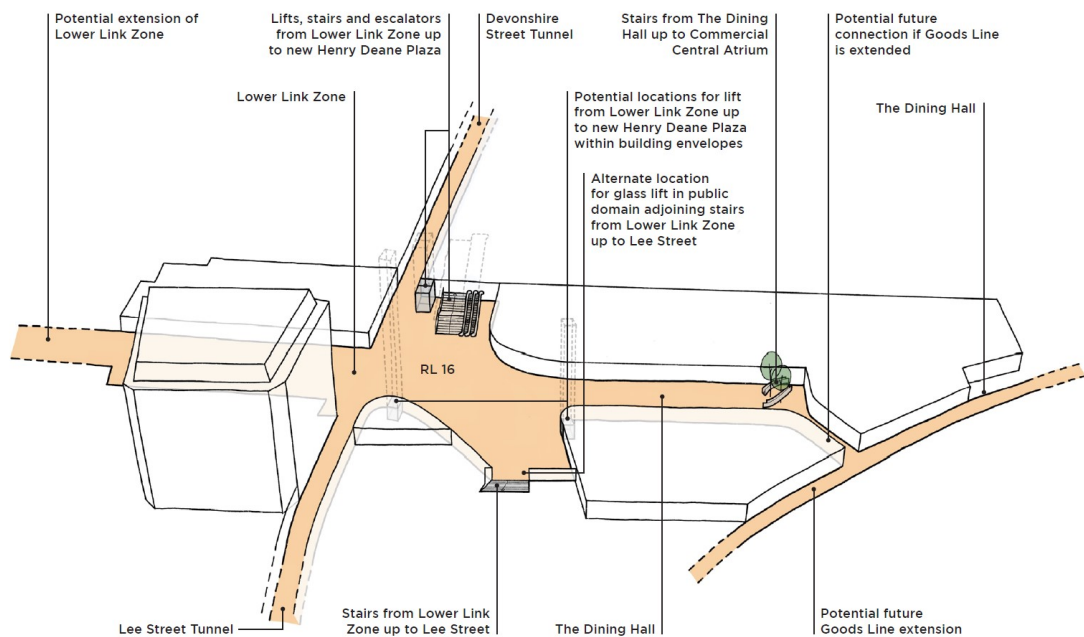


Figure 8. Lower level public accessible space framework

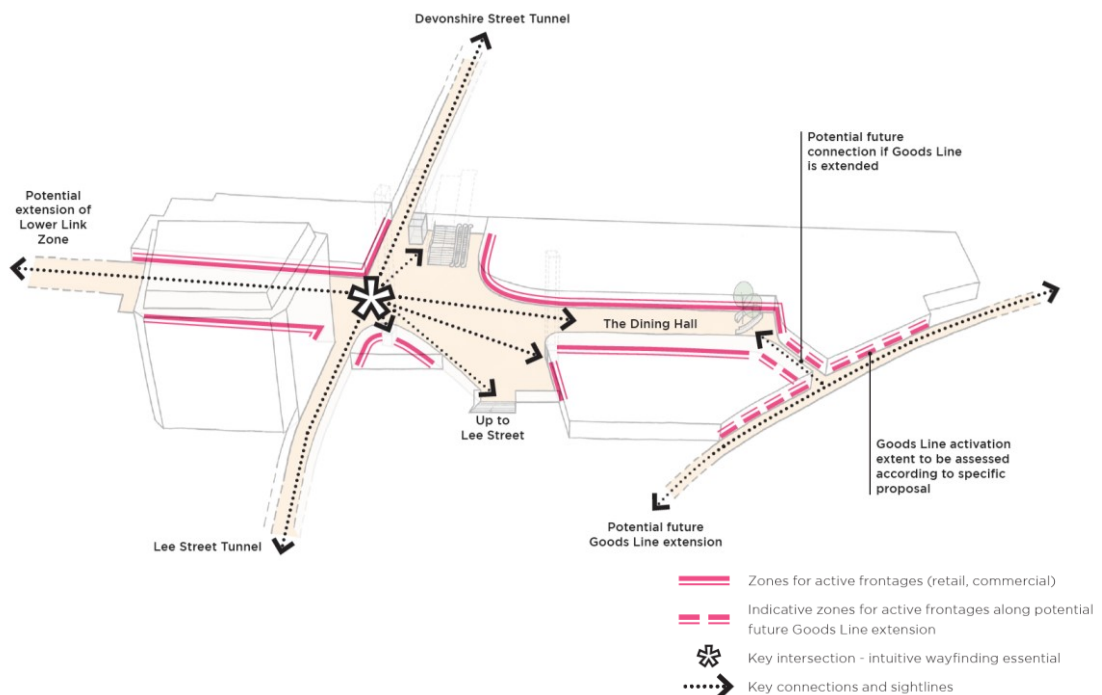
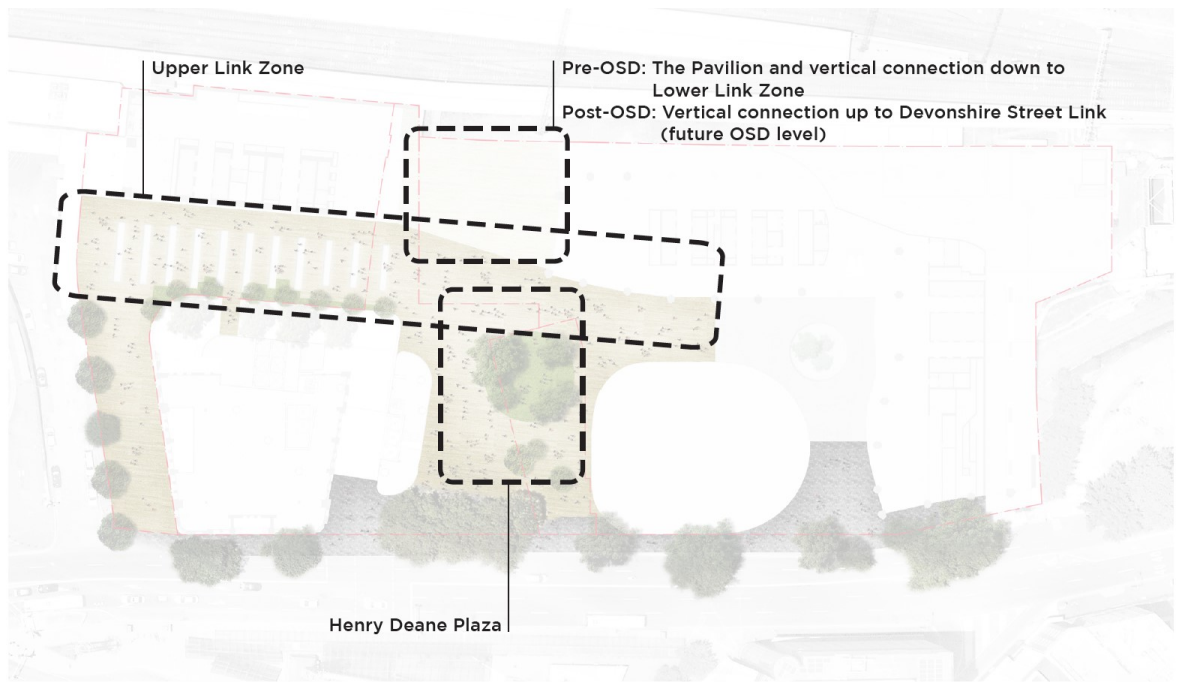


Figure 9. Lower level active frontages, key connections and daylight penetration

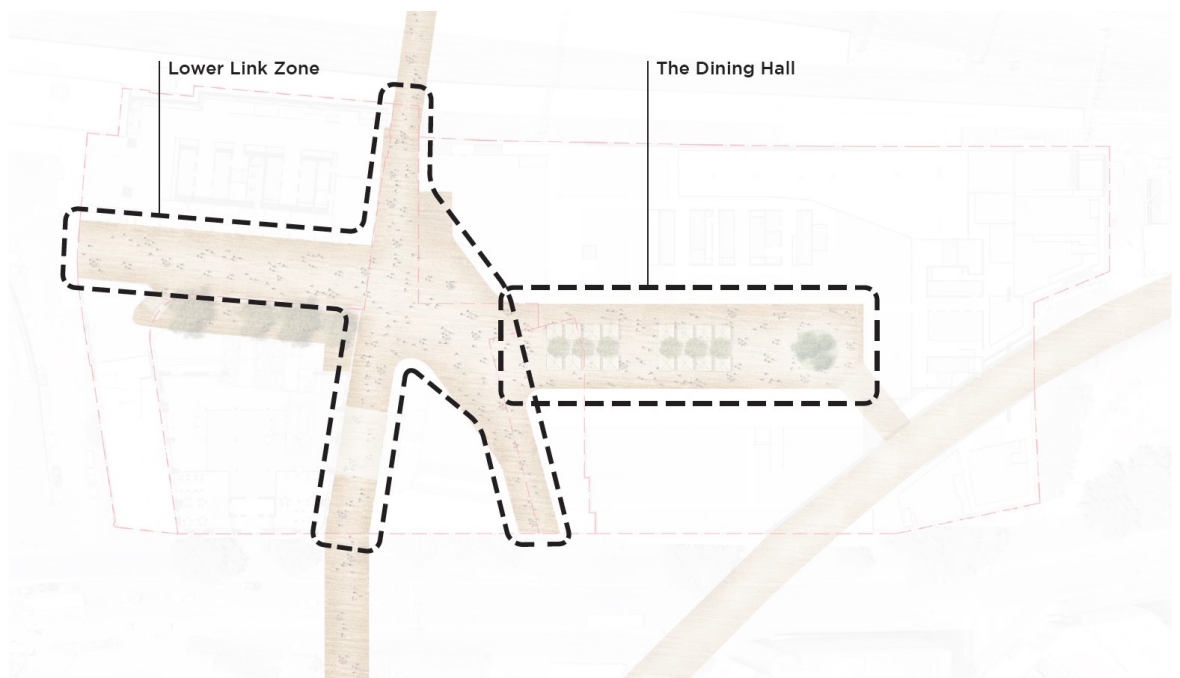
Places

Along with a series of public domain design principles to guide the future design of the public domain, the Publicly Accessible Space Strategy provides high level design direction on key publicly accessible spaces within the Western Gateway as described below and shown in **Figure 6**.

- **The Link Zone (upper)** – Upper link zone becomes a raised boulevard linking Block B lobbies to Block A upper ground level, a Block C upper lobby, as well as linking the Henry Deane Plaza with the main Central Station buildings at RL 21 and Country Trains platforms. The upper link zone is movement space complemented with places to dwell and enjoy the sunshine. The upper and lower link spaces are connected by public stairs that will facilitate movement between levels and enable links between transport modes. Clear way-finding will ensure clarity to a layered urban realm, and the area will interpret and express the heritage character of the precinct.
- **Henry Deane Plaza** – The main Henry Deane Plaza will be a welcoming space, that will have some retail and foyer activation around its edges, as well as providing places for people to dwell in shade and a range of spaces to rest and connect with others. It will also be a movement place, acting as a forecourt space to the Tech precinct and a space to move through, particularly in the future if an OSD level is created. The upper level plaza will provide gathering and arrival spaces, with complementary retail and highly curated experiences. Envisaged as connecting space for the commercial precinct, the upper levels will facilitate community connectivity and knowledge sharing.
- **The Pavilion** – The Terrace Pavilion is a sub-space of the new Henry Deane Plaza. In the short to medium term, it will serve as a temporary community space at RL 21 that provides a continuous active frontage in between Blocks A and B. In the long term, this space can be converted to provide a vertical connection/stairway up to the future OSD level at RL 30.
- **The Link Zone (lower)** – Lower link zone provides an intuitive and safe pedestrian connection from Central Walk West to Henry Deane Plaza and in the initial condition, Devonshire Street and Lee Street tunnels. The lower link zone will have a significant proportion of its edges activated with retail tenancies, and where possible some food consumption spaces. These must be balanced with the important role of ensuring adequate space to cater for the significant numbers of people who will be moving through these spaces in peak times. Clear wayfinding will be essential to ensure the smooth flow of people through the precinct.
- **The Market Place** – The Market Place will provide a vibrant experience for tenants and visitors to Block B, integrated with curated retail and dining tenancies. Lower levels are envisaged to include a distinctive food hall type space, providing retail services and amenity to workers, students, travellers and visitors to the precinct, and extending this space into a destination offer for off peak times. The food hall could be underpinned by a supermarket providing a convenient location for groceries on the run. Flexibility of space, interconnectivity between levels and innovative offerings will establish a lively connection for the adjacent city uses, the workspaces and the people passing through.



Upper level places



Lower level places

Figure 10. Key publicly accessible places of the Western Gateway sub-precinct

5.2 Amendments to the draft Western Gateway Design Guide

Transport for NSW has reviewed certain issues raised as part of submissions received and has updated the draft Design Guide for the Western Gateway sub-precinct to clarify matters addressed within submissions received.

It is noted that since exhibition of the Block C rezoning proposal, the draft Western Gateway Design Guide (V4) has undergone a separate parallel finalisation process associated with the proposals for Blocks A and B. The proposed amendments in relation to the Block C rezoning proposal have been made to the latest version of the draft Western Gateway Design Guide (version 4 May 2021). This aims to capture amendments made to the Western Gateway Design Guide arising from the separate finalisation process for Block A and B to ensure the impacts associated with the Block C is assessed against the future desired criteria and built form for the Western Gateway sub-precinct.

The following amendments outlined within **Table 5** are proposed to the Design Guide. Minor corrections to grammar and spelling are not included within this Table.

Table 5. Summary of amendments to Western Gateway Design Guide

Ref.	Section	Proposed amendment
Section 2.1 Desired future character		
1	Section 2.1 (h)(n)	<p>The Western Gateway sub-precinct will:</p> <p>[...]</p> <p>(h) Be characterised by a built form that embraces and celebrates the area's historical significance, responds sympathetically to the 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>
Section 3.1.1 Publicly accessible managed space		
2	Figure 2	Updated figure for publicly accessible managed space and pedestrian connections
Section 3.1.2 Building Massing and envelope		
3	Section 3.1.2 Objective (c)	(c) Development is to provide an appropriate vertical clearance and curtilage to existing heritage items, in particular the Former Inwards Parcel Shed and Former Parcels Post Office Building.
4	Section 3.1.2 Objective (d)	(d) Any building structure within the vertical separation zone above the former Parcels Post Office building is to be minimised and sufficiently set back from the northern and western façade line to ensure the preservation and integrity of the restored roof.
5	Section 3.1.2 (13)	<p>(13) 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:</p> <p>a. comprise a single tower form with a maximum floorplate gross building area of 1,300 sqm that must be wholly contained within the</p>

Ref.	Section	Proposed amendment
		<p>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</p> <p>b. must be designed to ensure that any tower form above the former Parcels Post Office building is not located north of a chamfered setback that aligns with a diagonal from the north-east corner to the south-west corner of the heritage building</p> <p>c. must be designed to ensure that the tower is setback a minimum 5m from the north-east and south west corners of the former Parcels Post Office building (parallel to the northern and western facades respectively)</p> <p>d. must have a minimum separation of 16m from the Block A planning envelope and a minimum 12m separation between western façade of the Block A building and the eastern façade of the Block C building</p> <p>e. be designed to ensure must have floor plate protrusion that is no greater than 16m from the southern façade face of the former Parcels Post Office, and allow for a ground level and lower ground level pedestrian connection of no less than 8m between the southern structural core and the southern façade of the former Parcels Post Office building</p> <p>f. provide a vertical separation zone between the underside of the tower and topmost point of the reinstated double pitched roof to the Parcels Post Office Building, which:</p> <ul style="list-style-type: none"> 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 Office building iii. does not comprise building enclosures other than necessary structural elements to support any vertical addition to the former Parcels Post Office building iv. does not have a detrimental visual impact, when seen from the public domain, from structural elements on the heritage setbacks <p>g. be designed to ensure any vertical addition to the former Parcels Post Office 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 Parcels Post Office building’.</p> <p>h. comprise no more than 41,000sqm gross floor area within the tower envelope on Block C (including the former Parcels Post building).</p> <p>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.</p> <p>Note: where controls reference the need to setback from façade of the former Parcels Post Office building, the setback should be calculated</p>

Ref.	Section	Proposed amendment
		from the average of the substantive façade face of the former Parcels Post Office, excluding projections and cornices.
6	Figure 3	Updated figure for separation distances and setbacks for lower levels of the Western Gateway sub-precinct
7	Figure 4	Updated figure for separation distances and setbacks for upper levels of the Western Gateway sub-precinct
8	Figure 6	New figure for North-South Section - Separation distances and setbacks (Blocks C – B)
9	Figure 7	Updated figure for East-West Section - Separation distances and setbacks (Blocks A – C)
Section 3.1.5 Wind		
10	Figure 7	Updated figure for wind criteria map to include Block C planning envelope
Section 3.1.6 Solar access		
11	Section 3.1.6 Objective (a)	(a) To maintain a high level of daylight access to Henry Deane Plaza and other affected publicly accessible areas during the period of the day when they are most used by the workforce, visitors and the wider community.
Section 3.1.7 Views and vistas		
12	Section 3.1.7 (3)	(3) The separation between Block A and Block B is to be open to the sky from RL30 and above to ensure that view lines from the over station pedestrian connection through to the tower of the Marcus Clarke building are not interrupted
Section 3.2.1 Heritage		
13	Section 3.2.1 Objective (a)	(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.
14	Section 3.2.1 Objective (b)	(b) Development is to retain and re-use any assessed heritage significant heritage items , features, specific spaces and fabric of significance.
15	Section 3.2.1 Objective (c)	(c) Development is to enable the sensitive adaptive re-use of any assessed heritage significant heritage items , features, specific spaces and fabric of significance.
16	Section 3.2.1 (1)	(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.
17	Section 3.2.1 (4)	(4) Development is to comprise of building forms and design treatments that give consideration and positively responds to heritage items within and immediately surrounding the sub-precinct. The Statement of Heritage Impact that accompanies a development application is to identify and assess any direct

Ref.	Section	Proposed amendment
		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.
18	Section 3.2.1 (6)	(6) Architectural detailing t is to provide a higher order of priority to the levels interfacing with the heritage items and adjacent public domain. This should take an informed and strategic approach to form, colour, materials, and details and respond to the immediate context and character.
19	Section 3.2.1 (9)	<p>(9) Development on Block C is to:</p> <ul style="list-style-type: none"> a. incorporate an innovative structural response to minimise the impact of structural intrusion on significant heritage elements of the former Parcels Post Office building, and enhance legibility of significant heritage facades (for clarity this does not include the highly modified eastern façade). 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 Office building and the lowest point of the underside of the tower above as shown in Figure 7: Separation Distances and Setbacks (Blocks A-C). c. be designed to ensure 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. d. be designed to ensure vertical circulation to access the upper floor plates above the former Parcels Post Office 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. 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. f. Future development is to increase ground level public access to the existing former Parcels Post Office 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 to identify practical ways of implementing the principles for action in the draft 'Connecting with Country Framework' (GANSW, 2020)

Ref.	Section	Proposed amendment
		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.

6 Conclusion

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

6.1 Next steps

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

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

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

7 Response to submissions table

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
Government Agencies			
20	City of Sydney	<p>Sustainability</p> <p>Lack of integrated precinct-based ESD measures across three Western Gateway sites</p>	Please refer to Section 4.5 of the RtS Report relating to sustainability.
		ESD Report does not discuss most recent Green Star tools, does not specify mechanisms for implementation and requires more detail to prove assumptions	Following the Design Excellence competition that will be undertaken on the site, TOGA can articulate the proposed solution that will be pursued to achieve its target of a 6 star Green Star rating.
		<p>The City has the following specific comments on ESD commitments included in the exhibition documents:</p> <p>NABERS</p> <ul style="list-style-type: none"> The proposed Energy Target of NABERS 5.5 (office) and 4.5 (Hotel component) are acceptable for an existing building context compared to new. It is acknowledged that separate NABERS Rating Targets for different parts of a building (hotel / office) can be a challenge. The ESD report and any consents from Department of Planning Industry and Environment (DPIE) should require a "NABERS Energy Commitment Agreement" as the mechanism to ensure the Targets are delivered once building completed and occupied 	Noted.
		<p>Greenstar</p> <ul style="list-style-type: none"> The proposed target of 6 Star is appropriate. Credits are to be maximised in the most important and urgent theme areas of Energy/Carbon and Water Conservation It is important to seek the proponent's awareness of revised GreenStar tools and not reference version 1.2 specifically in case this is not the most contemporary version of the tool at time of lodgement 	Noted.
		<p>Zero carbon building</p> <ul style="list-style-type: none"> The commitment to producing a zero carbon building is strongly supported but more detail is needed about the commitment to "Minimise combustion in building systems to enable zero-carbon operations through renewable power purchase" (page 4 ESD Report). A proposal for off-site renewable power purchase is supported to achieve Zero Carbon. Mechanisms (for example, a power purchase agreement with contract for 10 years) are to be established to ensure this 'commitment' (net zero) will be delivered. 	TOGA's ambition is to design and deliver a highly efficient green building that will stand the test of time and demonstrate TOGA's standing as a market leader in this regard. TOGA's commitment is in line with the performance requirements outlined in the Western Gateway Design Guide.
		<p>Precinct based energy supply options</p> <ul style="list-style-type: none"> The City supports the commitment to: "4.2.6 Explore options for shared utility supply across the precinct If the benefits of precinct scale solutions are to be realised, the NSW government needs to proactively require precinct thermal energy plant connectivity, energy storage and inter-building energy exchange and actively facilitate options discussion between adjoining developments. 	Noted.
		<p>Precinct-based non-potable water supply options</p> <ul style="list-style-type: none"> The City supports the commitment to: "6.2.7 Explore options for shared precinct water recycling plant If the benefits of precinct scale solutions are to be realised the NSW government needs to proactively require connectivity (i.e. future proof buildings by installing dual plumbing networks) and actively facilitate options discussion between adjoining developments. 	Noted.
		<p>Thermal envelope performance insulation</p> <ul style="list-style-type: none"> Insulating existing walls in heritage buildings requires sophisticated design and construction methods. The planning framework should require the solution to be developed early. If the issue is left unresolved until National Construction Code (NCC) Section J (Energy Efficiency) at Construction Certificate stage, the improved thermal performance of external walls may be compromised. This is a building resilience matter given increased number of extreme heat days and extended heatwaves. The City recommends the design solution of insulating existing walls also addresses condensations risks. 	Noted.
		<p>On site renewable energy generation via photovoltaics</p> <p>Opportunities for using the roof should be explored as it has good middle of day solar exposure and this is protected into the future by Railway Square.</p>	Noted.
		<p>Heritage</p> <p>"At the outset, the City of Sydney does not regard the State Heritage listed former Parcels Post building site as a suitable development site for a tower due to its heritage status and due to its proximity to future critical open space.</p>	Please refer to Section 4.1.3 of the RtS Report in relation to physical and structural impacts to heritage items.

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		Regardless, the proposed design approach must cantilever high above and separated from the existing building without infill or support structure passing through the heritage building."	
		The reference design shows the zone between the former Parcels Post Office building and the base of the tower as enclosed. This does not result in appropriate curtilage to the heritage building.	Please refer to Section 4.1.4 of the RtS Report relating to curtilage to the former Parcels Post Office building.
		<ul style="list-style-type: none"> • Policy 25 of the CMP does not allow for any development to the facades unless to reinstate original details. The proposal is to largely demolish the eastern facade to connect the new tower. 	Please refer to Section 4.1.5 of the RtS Report relating to site-specific conservation management plans.
		<ul style="list-style-type: none"> • Justification is sought with Policy 28, pointing to the reconstruction of this facade. This is unsatisfactory, as the facade should be retained and conserved in its entirety not altered with a large demolition and obscuration. 	Please refer to Section 4.1.5 of the RtS Report relating to site-specific conservation management plans.
		<ul style="list-style-type: none"> • Policy 31 also recommends the retention and restoration of all facades. The HIS argues that this proposal is only for a general envelope and not physical works. As development with the proposed envelope will result in physical works that demolish eastern facade, the proposal is inconsistent with the policy. 	Please refer to Section 4.1.5 of the RtS Report relating to site-specific conservation management plans.
		<ul style="list-style-type: none"> • Policy 55 intends to retain and strengthen existing columns and warns of structural damage with any removal. The proposal seems to have a substantial intervention on existing structure with enormous consequences. The HIS does not justify this intervention with any real argument. The current structure of the former Parcels Post Office building has no issues and it should not be modified or allow any structural intrusions. 	Please refer to Section 4.1.5 of the RtS Report relating to site-specific conservation management plans.
		<ul style="list-style-type: none"> • Policy 67 explores the possibility of cantilevered structure or addition on top of the existing building relying on the current structure and large separation. The proposed addition is not cantilevered, will have major visual and physical impacts and relies on significant structural modification. 	Please refer to Section 4.1.5 of the RtS Report relating to site-specific conservation management plans.
		<ul style="list-style-type: none"> • Policy 73 recommends considering vistas and views of the former Parcels Post Office building and relationship with Central Station. There is no analysis made in the HIS, graphics or studies to support the proposal. 	Please refer to Section 4.1.5 of the RtS Report relating to site-specific conservation management plans.
		<ul style="list-style-type: none"> • Policy 85 recommend that visual prominence of the former Parcels Post Office building to be maintained. The proposal does not maintain the visual prominence. 	Please refer to Section 4.1.5 of the RtS Report relating to site-specific conservation management plans.
		<ul style="list-style-type: none"> • Policy 89 highlights the necessity to maintain the landmark qualities and visibility of the fBBb's facades. The proposal fails to comply. 	Please refer to Section 4.1.5 of the RtS Report relating to site-specific conservation management plans.
		<ul style="list-style-type: none"> • Policy 90 recommends retaining views and vistas. The proposal is inconsistent with the policy as it obscures the eastern views and vistas and the general relationship with the former Parcels Post Office building. 	Please refer to Section 4.1.5 of the RtS Report relating to site-specific conservation management plans.
		<p>Consultation</p> <ul style="list-style-type: none"> • No summary of appropriate and meaningful consultation with the Heritage Council is provided in the documentation. The City sees this as essential to guide the process to achieve a holistic outcome for heritage that can celebrate the important heritage of this precinct. 	Please refer to Section 4.1.6 of the RtS Report relating to consultation with the Heritage Council.
		<p>"The City raises concern around the lack of evidence of significant and meaningful consultation with the City's Aboriginal and Torres Strait Islander Advisory Group and the Government Architect's Aboriginal Liaison Officer. It recommends the following:</p> <ol style="list-style-type: none"> 1. Engage in an ongoing, meaningful consultation workshop process with City's Aboriginal and Torres Strait Islander Advisory Group and the Government Architect's Aboriginal Liaison Officer." 	Please refer to Section 4.1.1 of the RtS Report relating to designing with Country.
		The City recommends that the open space planning within the Western gateway be developed in collaboration with the City.	Please refer to Section 4.3.2 of the RtS Report relating to pedestrian movement, open space and public domain.

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		<p>Design Guide</p> <ul style="list-style-type: none"> It is acknowledged that a coordinated Public Domain Strategy will be prepared post exhibition and will be informed by the Design Guide. For a development of this size, the Design Guide should set the measurable criteria, including comfort and safety criteria for microclimate, to inform the development of the open space planning, not the other way around. This is a result of poor site planning and no coordination between the development sites and affected adjacent spaces, and likely to lead to poor outcomes. 	<p>Please refer to Section 4.3.2 of the RtS Report relating to pedestrian movement, open space and public domain and Section 4.4.2 regarding the wind and microclimatic impacts.</p>
		<ul style="list-style-type: none"> The wind modelling appears to have been prepared based on the refined, anticipated building form and not the envelope. Including wind standards in the Design Guide would ensure that there is consistency between the wind modelling report and the envelope- i.e. rounded corners and flat top must be consistent with envelope as these will affect the wind comfort. 	<p>Please refer to Section 4.4.2 of the RtS Report relating to wind and microclimate impacts.</p>
		<p>Open Space</p> <ul style="list-style-type: none"> The relationship between the development and the future square to its north and west is unresolved. 	<p>A Publicly Accessible Space Strategy relating to the Western Gateway sub-precinct has been prepared and is included at Appendix H.</p>
		<ul style="list-style-type: none"> The use of the term “public domain” (Planning and Justification Report) is confusing. It was noted in the City’s previous commentary on the Draft Design Guide that the Western Gateway did not include any public domain, it includes publicly accessible private open space. It was recommended that “Public Domain” be replaced with “Open Space.” It is noted that the current version uses “Public Domain”, and Domain is a synonym of domain. Incorrect definitions of public domain may result in confusion for Development Assessment. 	<p>Terms and definitions of opens space areas have been revised within the draft Design Guide and Publicly Accessible Space Strategy (formerly Public Domain Strategy).</p>
		<p>Pedestrian Connectivity</p> <p>"The pedestrian modelling used to inform the open space and urban design responses have not been exhibited with the package. This information is critical to understanding the Western Gateway design responses for the sub-precinct.</p> <p>The following recommendations are listed:</p> <ul style="list-style-type: none"> Make the pedestrian modelling used to inform the design of the Western Gateway public." 	<p>Please refer to Section 4.3.2 of the RtS report.</p>
		<ul style="list-style-type: none"> A pedestrian movement analysis has not been provided as part of the exhibition package; however, reference is made to improving and prioritising the pedestrian experience within the Western Gateway. The proposed primary pedestrian paths are considered to be convoluted and of poor amenity, requiring paths of travel that are primarily underground and using bridges, and returning to street level within narrow escalators. 	<p>Please refer to Section 4.3.2 of the RtS report.</p>
		<ul style="list-style-type: none"> "• Pedestrian connections at ground level, open to the sky, must be prioritised over underground and above ground connections. Includes comment referring to image that shows the most direct route with highest pedestrian amenity. <p>The following recommendations are listed:</p> <ul style="list-style-type: none"> Prioritise pedestrian connections at ground level, open to the sky preferred over convoluted, underground and above ground connections" 	<p>Please refer to Section 4.3.2 of the RtS report.</p>
		<p>"The City challenges assumptions made in the exhibition documents that a major north-south pedestrian movement path will be required linking the Grand Concourse at RL 21 to Mortuary Station passing through the Dexu Frasers site. The City understands that the north-south pedestrian path will be a secondary link for workers exiting Central Walk West (CWW) employed in one of the three development sites within the Western Gateway. The City understands from internal testing, that the primary movement of pedestrians exiting CWW will be west towards the intersection of George St, Pitt St and Quay St and not in a north south direction.</p> <p>The following recommendations are listed:</p> <ul style="list-style-type: none"> Remove all references to the north-south link connecting the Western Gateway to the Grand Concourse at RL 21 from the Design Guide and supporting documentation." 	<p>Further collaboration and refinement on the draft Western Gateway Design Guide (refer to Appendix G) has been undertaken involving the proponents of the Western Gateway sub-precinct, DPIE and the City of Sydney, as part its finalisation process. This process has refined the proposed connections set out in the document, specifically removing a proposed extended connection south through Block B to Lee Street.</p>
		<p>It is concerning that the focus on the RL 21 link to improve pedestrian connectivity appears to justify an additional 2,000sqm GFA under HDP and the lower levels of the hotel.</p>	<p>The purpose of the RL 21 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 Western Gateway sub-precinct and to the future potential OSD of Central Precinct.</p>
		<p>Planning</p> <ul style="list-style-type: none"> The City’s interest in Central Station is for the long term, and the design and planning for the precincts needs to reflect this long horizon. The proposal must therefore not be limited to only guiding the development’s direct footprint in the short-term but also its wider impact on the precinct in the long-term. 	<p>Noted.</p>

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		<p>Technical Reports</p> <ul style="list-style-type: none"> The site-specific CMP and visual assessment written for each site separately and issued concurrently with DA documentation will not provide an independent assessment in relation to the holistic heritage setting. The City recommends adopting one of the two independently written CMPs (one by the Government Architect's Office and one by TZG for TfNSW). This is essential for development of the site to be considered appropriately. 	Please refer to Section 4.1.5 of the RtS Report relating to site-specific conservation management plans.
		<ul style="list-style-type: none"> The CMP seems to be tailored for a future development that anticipates a tower to be built or partially built on the former Parcels Post building. One part of the CMP seems adequate to guide the conservation of the item, another part seems specifically written to justify a future tower development. 	Please refer to Section 4.1.5 of the RtS Report relating to site-specific conservation management plans.
		<ul style="list-style-type: none"> The current Heritage Impact Statement (HIS) does not assess any proposed form or envelope, structural intervention or views and vistas to and from the building. Consequently, the HIS is too general and lacks specific detail. 	These matters are further addressed in the Supplementary Heritage Response prepared by Urbis (Appendix B) and the Supplementary Structural Response prepared by Robert Bird Group (Appendix E).
		<ul style="list-style-type: none"> The Structural Viability Report (SVR) comments on a tower that partially penetrates the former Parcels Post Office building. This is not a study to evaluate a possible additional envelope but seems to analyse and establish the future development itself. It does not explore and assess possibilities and/or general proposals and fails to justify the proposed alteration. 	Please refer to Section 4.1.3 of the RtS Report relating to physical and structural impacts to heritage items.
		<p>It is noted that an assessment was prepared to investigate the presence or absence of Aboriginal objects that may exist within the subject area, which concluded that deeper, undisturbed soils under existing structures and below existing disturbance associated with historical land use has moderate archaeological potential regarding Aboriginal heritage objects. As such, the assessment recommends that an Aboriginal Cultural Heritage Assessment be included in any application. The City is concerned that this has not been included, and request that it be included.</p>	<p>An Aboriginal Cultural Heritage Assessment will be prepared prior to and will be submitted with any subsequent detailed Development Application for Block C. It is noted that a future Secretary's Environmental Assessment Requirements (SEARs) will require the a Aboriginal Cultural Heritage Assessment Report prepared in accordance with relevant guidelines, identifying, describing and assessing any impacts for any Aboriginal cultural heritage values on the site. This is a standard SEAR in the latest set of new environmental impact assessment guidelines prepared by DPIE to apply to SSDAs moving forward. https://www.planning.nsw.gov.au/Policy-and-Legislation/Planning-reforms/Rapid-Assessment-Framework/Improving-assessment-guidance.</p>
		<ul style="list-style-type: none"> The exhibited Planning and Justification Report includes assumptions about land outside the Western Gateway that will be determined as part of the next stage of works (e.g. RL 21 north-south link). 	Please refer to Section 5.1 of this RtS Report and the Publicly Accessible Space Strategy included at Appendix B for discussion on RL 21, the north-south link and connections with the broader area.
		<p>"The potential impact of the proposed tower on the microclimate in the adjacent future square is a significant concern for the City. There is no reference in the exhibited material to the microclimate conditions identified in the City's previous submission on the Draft Design Guideline. Specifically, there is no criteria established for wind comfort, or cross referenced with the Design Guide.</p> <p>The City notes the following specific concerns regarding the impacts of the proposed tower on the microclimate:</p> <ul style="list-style-type: none"> The wind comfort standards (exceeded 5% of all hours) should be the following as per the locations identified in the following map: <ul style="list-style-type: none"> walking through the OSD connection and footpaths - 8 m/s standing at building entrances, bus stops - 6 m/s sitting in future public spaces - 4 m/s <p>Recommendations proposed include:</p> <ul style="list-style-type: none"> Adopt wind comfort standards in the Design Guide and supporting documents with locations as per the above map for land within the Western Gateway and adjacent affected land." 	Please refer to Section 4.4.2 of the RtS Report relating to wind and microclimate impacts.
		<p>Traffic and Transport</p> <ul style="list-style-type: none"> The study has not estimated service vehicle number, size and coach/bus and drop off /pick up vehicles number. It has not provided traffic impact from this development to the adjacent network. The planning framework must include measures to service the developments with shared loading onsite without impact the public domain and pedestrian movements. 	Please refer to Section 4.3.1 of the RtS Report relating to vehicular transport issues.

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		<p>"• The following documents need to be consulted and implemented to any future proposal on this site (in addition to the documents that are listed in GTA's report).</p> <ul style="list-style-type: none"> • City of Sydney Cycling Strategy and Action Plan 2018-2030. • City of Sydney Walking Strategy and Action Plan 2015-2030. • Relevant Internal studies such as (some studies could be confidential; please check before you send those to the applicant) • Pentelic Advisory's Preliminary Transport Context Analysis provides a basis of current and future access needs of the site. • Camperdown Ultimo Collaboration Precinct • Camperdown-Ultimo Place Strategy" 	<p>These documents have been assessed against the proposal in Section 2.2 of the Transport Assessment that accompanied the rezoning proposal. As noted in the Supplementary Transport Assessment prepared by GTA Consultants (Appendix D), GTA Consultants requested the City of Sydney Walking Strategy and Action Plan from Council, however these documents were not available at the time of submission. All documents will be consulted and implemented as part of any future DA on the site.</p>
		<ul style="list-style-type: none"> • The City does not support the proposal to use the proposed carparking rates in this location, which has the highest level of access to public transport. The City recommends zero commuter car parking on site. 	<p>Please refer to Section 4.3.1 of the RtS Report relating to vehicular transport.</p>
		<p>"• TfNSW and City of Sydney have been doing significant work to understand the future opportunities and vision for the Central Precinct.</p> <ul style="list-style-type: none"> - The future layout of Lee Street is likely to deprioritise or be closed to vehicle movement - The future layout of Parramatta Road is likely to reallocate several lanes from vehicles to people and place <p>• The proposal suggests the bus/taxi drop off will be on Lee Street in front of the site which does not align with the above vision. Moreover, Sydney DCP requires drop/off pick up locations to be located within the site. Any future proposal will have to comply with these requirements.</p> <p>• Vehicle access and associated traffic modelling should include all future potential road closures."</p>	<p>The proponent is aware of the broader planning intent in and around Railway Square, Parramatta Road and the western Central Station forecourt including the potential to close Lee Street at Railway Square. It is currently difficult to definitively include such guiding principles on what may or may not occur in the Central Precinct over the medium to long term as part of planning for the site, however this will be considered as part of any future DA's as guiding principles become available.</p> <p>For further discussion, please refer to the Supplementary Transport Assessment prepared by GTA Consultants (Appendix D).</p>
		<ul style="list-style-type: none"> • The proposal is to strictly comply with section 7.8 of DCP 2012 for loading and service vehicle parking spaces and to include this in the Design Guide. 	<p>The Sydney DCP 2012 provisions for loading and service vehicle activity are considered excessive for mixed use developments in constrained CBD environments. These provisions recommend the provision of 21 loading bays, which is inappropriate for a site in this location. Alternatively, practical shared use of loading bays under a loading dock management system is a more appropriate approach. A detailed first principles assessment to appreciate the 'practical' loading demand of the proposal has been completed post submission and will be further developed and verified during the preparation of future detailed DAs. Overall provision of between five and six loading bays is considered practical and supported, and this aligns with other key Sydney CBD sites where spatial areas are constrained and operational efficiencies have been practically implemented.</p>
		<ul style="list-style-type: none"> • The proposal is to meet Council's requirements of section 3.11.13 of the DCP for waste collection. Note that, waste collection vehicles are usually larger than an MRV. 	<p>Ongoing design development has considered truck access for vehicles up to 8.8m medium rigid trucks. Given the absence of residential apartments, waste collection will be conducted by private contractors which is consistent with other developments in the Sydney CBD, with a variety of vehicle sizes and capacities able to be utilised and tailored to specific site access requirements.</p>
		<ul style="list-style-type: none"> • Any future proposal to this site must comply with Council DCP 2012 Clause 3.11.3 and relevant Australian Standard AS 2890.6:2015 and provide adequate bicycle parking and end of trip facilities. 	<p>Section 4.4.1 of the Transport Assessment accompanying the exhibited rezoning proposal includes a demand assessment of bicycle parking and end of trip facilities, which suggests significantly lower demand as a result of the known 80 per cent of trips by train or bus. The ideal mixture of</p>

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
			bicycle parking, lockers and shower and change room facilities should be driven by exemplar developments and known use of facilities. Further design development as part of any future DAs will incorporate such facilities within the basement.
		<p>Wind</p> <ul style="list-style-type: none"> It is noted that advice in the City's previous submission on the Western Gateway Blocks A and B was that the impact of wind should be mitigated through envelope and not canopy structures. It is noted that this is not achievable for a tower of 41,000sqm. The uncomfortable and unsafe wind conditions between Blocks A and C and Blocks A and B will have to be addressed through canopies etc. 	Please refer to Section 4.4.2 of the RtS Report relating to wind and microclimate impacts.
		<p>"The wind modelling should be assessed against the comfort criteria stipulated in the Design Guideline criteria and the recently approved Central Sydney Development Control Plan clause which states that if the existing condition is uncomfortable or unsafe then it must not be made worse. Locations where the modelling shows worse conditions with the addition of the TOGA tower include:</p> <ul style="list-style-type: none"> Locations 9 and 10 (North eastern corner HDP) Locations 13 and 14 (Between Blocks A and C) Locations 29 and 30 (Devonshire St bridge and stair to OSD)" 	Please refer to Section 4.4.2 of the RtS Report relating to wind and microclimate impacts.
		<ul style="list-style-type: none"> Undertake wind tunnel testing on the proposed envelope and not the reference design since the final design could fill the proposed envelope. 	Please refer to Section 4.4.2 of the RtS Report relating to wind and microclimate impacts.
23	Heritage NSW – Tim Smith OAM	<p>Built Form</p> <ul style="list-style-type: none"> Whilst it is noted that a 5-10 metre minimum setback from the northern and western facades is proposed for the tower structure envelope, to limit impacts to the prominence of the building when viewed from Railway Square and Sydney's potential Third Square, the proposed envelope will obscure the eastern and southern facades. This will impact the building's landmark qualities when viewed from Lee Street. The Heritage Council however feels that visual impacts could be mitigated if the proposed setback is substantially increased behind the northern and western facades and to preserve the integrity of views to the building. We would welcome detailed design to achieve this outcome. 	Please refer to Section 4.2.2 of the RtS Report relating to building setbacks and separation.
		<ul style="list-style-type: none"> It is noted that the proposed envelope extends 16 metres into Henry Deane plaza. It is unclear how this will impact the prominence of Marcus Clarke tower when viewed from the east/west connection across Central Precinct. Further visual studies should be undertaken to ensure the retention of views to the central tower of the significant Marcus Clark Building. 	Please refer to Section 4.24.3 of the RtS Report relating to visual and view impacts.
		<p>Bulk and Scale</p> <ul style="list-style-type: none"> We understand that the proposed amendments to the gross floor area (GFA) will increase the maximum GFA from the current maximum 3:1 to 43,000m2. This represents a significant increase in GFA which will be potentially difficult to respond positively to the existing form, bulk and scale of the former Parcel's Post Office building. 	Please refer to Section 4.1.2 and 4.2.1 of the RtS Report relating to responding to existing heritage and height, scale, and density, respectively.
		<p>Consultation</p> <ul style="list-style-type: none"> It is understood that this draft SEPP Report does not seek consent for the indicative reference scheme and that any future development within Block C will be subject to a competitive design process and subsequent Development Application and assessment process. It is recommended that ongoing consultation and input from Heritage NSW is undertaken as part of this process. 	Please refer to Section 4.1.6 of the RtS Report relating to consultation with the Heritage Council.
		<p>Heritage</p> <p>The Council recognises however that the large scale towers will result in adverse visual impacts to the Central Railway Station site, in particular, as it does not relate to the predominant scale, density and grain of the significant built form, the fabric of the SHR-listed building elements, and cultural landscape context.</p>	Please refer to Section 4.1.2 of the RtS Report relating to responding to existing heritage context.
		<ul style="list-style-type: none"> The proposal will also have obvious impacts to the setting, character and landmark qualities of the former Parcels Post Office building given the scale of change to the Western Gateway sub-precinct site. This underscores the importance that key heritage values, elements, and views and vistas remain central to any redevelopment of the area. 	Please refer to Section 4.1.2 of the RtS Report relating to responding to existing heritage context.

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		<ul style="list-style-type: none"> The Heritage Council understands that the proposed maximum building height amendment for this site will enable development that visually impacts the landmark former Parcels Post Office building. New development is unlikely to retain the predominant scale, density and grain of the existing built environment and context of the SHR-listed sites. 	Please refer to Section 4.1.2 and Section 4.4.3 of the RtS Report relating to responding to existing heritage and visual and view impacts, respectively.
		<ul style="list-style-type: none"> We note that together, with the proposed Block A and B developments within the Western Gateway sub-precinct, the tower cluster will result in cumulative heritage impacts on the designed physical and visual prominence of the Sydney Terminal Rail and Central Railway Stations Group generally, including their landmark heritage qualities. However, the Heritage Council notes that these impacts could be somewhat reduced through high-quality design that puts the significant heritage values of the site at the core of the redevelopment. 	Please refer to Section 4.1.2 of the RtS Report relating to responding to existing heritage context.
		<ul style="list-style-type: none"> The proposed large-scale tower envelope over/adjacent this corner building has potential to diminish the identified landmark qualities and the setting of the building. It could also obscure whole facades of the building. Currently the entire building is legible from all sides which further emphasises its importance and prominence in the landscape. 	Please refer to Section 4.1.2 of the RtS Report relating to responding to existing heritage context.
		<ul style="list-style-type: none"> The former Parcels Post Office building is historically significant for its association with the development of the NSW rail and postal services in the early 1900s. The location of the building adjacent to the station reflects the importance of parcel distribution by rail. The building worked in conjunction with the former Inwards Parcels Shed and platforms in the western yard precinct. It is critical that these physical, functional and visual connections are retained and interpreted, and not obscured. 	Please refer to Section 4.1.2 of the RtS Report relating to responding to existing heritage context.
		<ul style="list-style-type: none"> Detailed consideration should be given to the form of any approved building in this sensitive environment, so that it respects the heritage values, character, form, proportions and setting of the existing structure. In our mind, this includes retention of visual and historic connections between the historic building and Central Railway Station and that any new build seeks to minimise, where possible, penetrations and disruption of spaces and historic fabric that talk to the building's former function. 	Please refer to Section 4.1.2 of the RtS Report relating to responding to existing heritage context.
19	NSW EPA	<p>"No material comment and no follow-up consultation required with NSW EPA</p> <p>Based on the information provided, the proposal does not appear to require an environment protection licence under the Protection of the Environment Operations Act 1997. Furthermore, the EPA understands that the proposal is not being undertaken by or on behalf of a NSW Public Authority nor are the proposed activities other activities for which the EPA is the appropriate regulatory authority.</p> <p>In view of these factors, the EPA has no comments to provide on this project and no follow-up consultation is required. Council of the City of Sydney should be consulted as the appropriate regulatory authority for the Protection of the Environment Operations Act 1997 in relation to the proposal."</p>	Noted.
Non-government organisations			
2	The National Trust – David Burdon	<p>Heritage</p> <p>It is noted that the stated aim of the program is to "create a precinct with a real sense of place, which connects into surrounding neighbourhoods, and draws on the character and heritage of this landmark location." This is an admirable aim, and it is hoped that measures are put in place to ensure that this is indeed the outcome of this massive project.</p> <p>The National Trust is opposed to the building of a tower over and above this important building. The proposal which is currently being put forward, would have a severe negative heritage impact on the Parcels Post Office building and its wider setting. This "particularly good" example of past urban design is set to be replaced with an excellent example of the worst in current planning practices – where a new tower will literally overhang a unique historic building and overshadow a public area. The current proposal will relegate the Parcels Post building to a mere postage stamp at the base of this new tower.</p> <p>The proposal is at odds with most of the expressed visions for the Central Precinct, in particular the aims to "establish a context-responsive built form approach that achieves a balanced distribution of height, density and scale" and "reinforce the iconic architecture of the Sydney Terminal building, former Parcels Post Office and Mortuary Station as important and defining character elements in the streetscape." Maintaining the view of the Parcels Post Building from the east by simply floating another building above it is not a good heritage outcome.</p>	<p>Please refer to Section 4.1.2 of the RtS Report relating to responding to existing heritage.</p> <p>Please refer to Section 4.1.2 of the RtS Report relating to responding to existing heritage.</p> <p>Please refer to Section 4.7 of the RtS Report relating to the Central Precinct Draft Strategic Vision.</p>

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		<p>Urban Renewal</p> <p>There is little doubt that the areas surrounding Central Station can benefit from some renewal projects, and the National Trust supports aims to revitalise this important area of the city. The Trust are however concerned with the way this is done, and encourage that the important and historic existing components of the place are seen as enablers of, rather than barriers to, a place with a unique urban identity.</p> <p>Photomontages</p> <p>The visual montages provided do not demonstrate the true impact of the proposal on the Parcels Post Office building</p>	<p>Please refer to Section 4.1.2 of the RtS Report relating to responding to existing heritage.</p> <p>The visual effects of a potential building envelope on the site have been accurately modelled so that its potential external visibility can be determined and visual effects on the effective and wider visual catchment can be assessed. Notwithstanding this, the Visual Impact Assessment submitted with the rezoning proposal for Block does not include a fine-grained assessment of the potential visual impacts of the tower form on its visual setting or on its surrounding heritage visual and physical context. This level of assessment would be undertaken subsequently as part of any future detailed development application.</p> <p>Please refer to Section 4.4.3 of the RtS Report relating to visual and view impacts.</p>
18	University of Technology Sydney (UTS) - Kara Krason	<p>Urban renewal</p> <p>It is exciting to see the NSW Government's vision for Tech Central taking shape and UTS remains a strong advocate and supporter for the renewal of Central Station, including broadly the latest plans by Toga for Block C of the Western Gateway.</p> <p>Pedestrian connectivity</p> <p>Improved pedestrian connectivity and capacity both within and surrounding the Western Gateway precinct is considered to be a key outcome and public benefit that should be secured and delivered. Based on the Department's response to UTS's previous submission and the rezoning proposal for Block C, UTS has no certainty that such critical public benefits will be realised. The reference design in support of the Block C rezoning proposal for example simply retains and extends the existing Lee Street tunnel connection (i.e. status quo).</p> <p>"The significant increase in floor space in the Western Gateway, broader precinct and the provision of a vastly expanded and improved east-west connection across Central Station will significantly increase pedestrian movements through the Lee Street Tunnel. Without expansion and augmentation, the Lee Street Tunnel is likely to become a bottleneck and will serve to inhibit the free flow of pedestrians from Surry Hills through to Ultimo and beyond.</p> <p>UTS submits that commitments to improving or augmenting the Lee Street Tunnel must be required as a condition precedent to the rezoning of Block C and should be delivered as part of development of Block C."</p> <p>UTS also reiterates previous comments around the need to commit and deliver early on an improvement to the current unsatisfactory termination of the Goods Line through its extension to Mortuary Station. Such a move will significantly improve legibility and the overall pedestrian experience while also opening up a continuous public domain link from Darling Harbour through Ultimo and beyond to Redfern and Surry Hills.</p>	<p>Noted.</p> <p>Please refer to Section 4.3.2 of the RtS relating to pedestrian movement, public domain and open space.</p> <p>Please refer to Section 4.3.2 of the RtS relating to pedestrian movement, public domain and open space.</p> <p>Please refer to Section 4.3.2 of the RtS relating to pedestrian movement, public domain and open space.</p>
21	Action for Public Transport NSW - Jim Donovan	<p>Unsuitable for pandemic</p> <p>• Generally, planning policies such as this should state what assumptions are being made about COVID- 19 and should indicate probable effects if those assumptions are inaccurate. We suggest that a section should be added somewhere addressing possible ramifications of the current pandemic that might affect the Precinct. For example, what happens if work-from-home remains as common as it was in 2020?</p> <p>Traffic and transport</p> <p>We think it would be a mistake to allow further development around the western gateway until there is rail capacity (i.e., the Chatswood-Sydenham metro) and pedestrian capacity to handle the extra people who will use the western gateway area. We suggest that the re-zoning proposal should therefore not proceed immediately unless a reservation can be incorporated into it to ensure that Block C redevelopment cannot open until the Metro is running and adequate capacity exists for pedestrian traffic. Ideally the extra pedestrian capacity would also serve to shorten walking distances for some trips.</p>	<p>Please refer to Section 4.6 of the RtS Report relating to responding to the COVID-19 pandemic.</p> <p>Please refer to Section 4.3.2 of the RtS relating to pedestrian movement, public domain and open space.</p>
22	Savills on behalf of Frasers Property Australia and Dexus Funds	<p>Access</p> <p>Further, the Block C Rezoning Proposal should demonstrate that it will not hamper access arrangements to Block B, particularly while Henry Deane Plaza remains in its current state.</p>	<p>This will be resolved through ongoing design development and future DAs, as access arrangements are still in the process of being established through consultation with the Consortium (proponent of Block B) and Atlassian (proponent of Block A).</p>

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
	Management Limited (The Consortium) – Stephanie Ballango	<p>Consultation</p> <p>The design and development of Henry Deane Plaza needs to be subject to ongoing coordination and collaboration between the multiple proponents to ensure a cohesive outcome and delivery of the highest quality public domain.</p>	Please refer to Section 4.3.2 of the RtS Report relating to public domain and open space.
		<p>Design Guide</p> <p>"1. The Consortium is of the view that any built form landing on the plaza should be limited to lightweight structural elements only/lightweight columns only (i.e., not building core such as lifts, stairs or services) and that Section 3.1 and 3.3 of the draft Design Guide should be amended to reflect this.</p> <p>This will be critical to pedestrian movement and circulation and will also reinforce Henry Deane Plaza's unique identity as an urban public domain and transition space between the built form and experiences on offer through the sub-precinct.</p> <p>While the configuration of Henry Deane Plaza will evolve following the introduction of the Western Walk, it will continue to be a crucial functional and visual link between Railway Square and the future over station deck. It will also contribute to the hierarchy of public domain spaces and links framing and modulating the journey across the precinct."</p>	Please refer to Section 4.2.2 of the RtS Report relating to building setbacks and separation.
		<p>Pedestrian Connectivity</p> <p>2. Appropriate controls should be included in the draft Design Guide to address the treatment of the southern façade of the proposed tower and prioritise pedestrian circulation and activation at the ground plane.</p>	Please refer to Section 4.3.2 of the RtS relating to pedestrian movement, public domain and open space.
		Developments such as 8 Chifley Square and 200 George Street are useful examples (see below) that demonstrate sympathetic placement of structure into and above the public domain and heritage buildings that could inform design guidance for Block C and contribute to ensuring the public domain and movement character of Henry Deane Plaza is prioritised.	Noted.
		<p>Technical Reports</p> <p>The Consortium requests the DPIE require the Block C building envelope to be explicitly defined as RLs at the Henry Deane Plaza along all site boundaries.</p>	The building envelope for Block C is defined in RLs within the revised Western Gateway Design Guide. Future levels of the future publicly accessible space of Henry Deane Plaza will be detailed as part of a future Public Domain Plan prepared as part of any subsequent detail DA. Notably this will be informed by the Publicly Accessible Space Strategy prepared for the Western Gateway sub-precinct (refer to Appendix H), which details future RLs for Henry Deane Plaza.
		Detail should consequently be sought in relation to existing and future levels under different development scenarios.	Future levels of the future publicly accessible space of Henry Deane Plaza will be detailed as part of a future Public Domain Plan prepared as part of any subsequent detail DA. This will need to demonstrate consistency with the Publicly Accessible Space Strategy prepared for the Western Gateway sub-precinct (refer to Appendix H), which also details future RLs for Henry Deane Plaza.
		3. Titling arrangements in the Precinct should be considered insofar as they may impact on the delivery and staging of the proposal	Future titling arrangements will be considered prior to any subsequent detailed Development Application once a resolved design scheme is selected from a competitive design process.
		<p>Traffic and transport</p> <p>"6. Complete traffic assessment of the additional proposed traffic load, noting that the proposed servicing arrangements via Block B remain subject to the proponent reaching commercial agreement with the Consortium.</p> <p>Further, the consortium suggests the following:</p> <ul style="list-style-type: none"> Consider the cumulative impacts of proposed Block C servicing on the existing vehicle traffic which will be facilitated by Central Place Sydney (c.430,000sqm). 	<p>These comments are noted and agreed.</p> <p>Toga (proponent for Block C) will work with Atlassian (proponent for Block A) and Dexus/ Frasers (proponent for Block B) to agree on the consolidated access arrangements through Block B as part of ongoing design development and future DA's. This will consider any vehicle access requirements for the over-station development (OSD) to the east of the precinct, which according to Block B's Transport Assessment is only required for emergency and maintenance vehicles. All loading deliveries associated with the OSD will use a centralised distribution centre in the</p>

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		<ul style="list-style-type: none"> In advance/lieu of this service arrangement being provided, demonstrate that access and servicing can be provided to Block C without reliance on Block B, should the latter not be delivered or suitable arrangements between the two parties cannot be reached. Stronger justification for the proposed Lee Street pick-up/drop off zone, and careful consideration of, and implications on, pedestrian travel paths and the public domain." 	<p>Block B basement. On the basis that no car parking is proposed for the OSD, this will not further impact the road network.</p> <p>The applicant has also considered interim access arrangements via the existing Right of Way to facilitate access for Blocks A and C in the event that Block B is not delivered, whilst enabling delivery of the future Central Walk West. This has been completed in consultation with Atlassian.</p> <p>Please refer to the Supplementary Transport Assessment prepared by GTA Consultants (Appendix H) for further discussion.</p>
		<p>Urban renewal</p> <p>The Consortium supports the redevelopment of Block C and the opportunities and benefits it will contribute to the Central Precinct and Tech Central. We also acknowledge the revitalisation will complement Central Place Sydney and vice versa by providing a variety of business, retail, and recreational experiences.</p>	Noted.
		<p>Wind</p> <p>"5. Note that the wind modelling was completed on the indicative scheme for Block B and future wind studies will need to incorporate the final Block B Development Application built form to ensure the established wind comfort criteria for Blocks A and B are not compromised.</p> <p>The Block C wind assessment is based on the reference scheme for Block B, and consequently the expected wind conditions may vary. Ultimately a revised wind modelling and assessment should be undertaken, informed by the future Development Application for Block B, to confirm that the criteria are correct for the intended purposes across Henry Deane Plaza and the public domain."</p>	Please refer to Section 4.4.2 of the RtS Report relating to wind and microclimate impacts.
1	Jamie Parker MP NSW Greens Heritage Spokesperson	<p>Heritage</p> <p>The rezoning proposal would contravene the current Conservation Management Plan.</p>	Please refer to Section 4.1.5 of the RtS Report relating to site-specific conservation management plans.
		<p>The proposal, along with adjacent proposals on top of the 1906 parcel shed (Block A) and the City of Sydney's 'garden square' plaza will remove the original elevated approaches to the station and significant colonial architecture, and pave the way for further detrimental alterations across the precinct.</p>	Please refer to Section 4.1.2 of the RtS Report relating to responding to existing heritage.
		<p>Height</p> <p>Towers on top of and beside historic buildings will be detrimental to views, landscape and the sense of space within the precinct.</p>	Please refer to Section 4.1.2 of the RtS Report relating to responding to existing heritage.
Community Submissions			
3	Kerstin Buccoliero	<p>Unsuitable for pandemic</p> <p>High rise buildings and hubs are difficult in the context of the pandemic and social distancing rules. Working from home is very popular especially in jobs concerned with technology.</p>	Please refer to Section 4.6 of the RtS Report relating to responding to the COVID-19 pandemic.
4	Anonymous	<p>Urban renewal</p> <p>Not much comment but I think it is good to build up a new environment and look.</p>	Noted.
5	Kevin Farmer	<p>Urban renewal</p> <p>General support of the redevelopment of the area in question</p>	Noted.
		<p>Overshadowing</p> <p>I note that in the Block C overview, overshadowing rules for Prince Alfred Park only apply up to 1400 on any day. As this development is to the west of the park, any associated over-shadowing would not generally occur until after that time as the sun sets, so I request that this ruling be amended to state that there must NEVER be any over-shadowing of the park as this would seriously affect natural growth (grass, trees, etc), animal life and public enjoyment of the park space.</p>	Please refer to Section 4.4.1 of the RtS Report relating to overshadowing.

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		<p>Height Another key concern is for any wind-tunnel effect which may be created by the approved height of buildings as shown. I recall this being an issue at Whitlam Square when The Connaught was being built and now that surrounding area is almost entirely uncomfortable for anyone passing through due to the constant wind which can now not be contained. This must not be allowed to happen in the new development around Central.</p>	Please refer to Section 4.4.2 of the RtS Report relating to wind and microclimate impacts.
6	Andrew Gibbes	<p>Heritage Oppose the rezoning of the site and the hideous development over this precious building</p>	Please refer to Section 4.1.2 of the RtS Report relating to responding to existing heritage.
7	Kevin Shaw	<p>Heritage I would be very disappointed if the Adina Hotel were to be replaced by a taller building, even if the Federation facade were to be preserved. I would rather that the scale of buildings in the Railway Square precinct be decided by the Marcus Clark buildings and the present Adina Hotel.</p>	Please refer to Section 4.2.1 of the RtS Report relating to height, scale and density.
8	Valerie Le Bihan	<p>Urban Renewal I am not against redevelopment of the area covered by the Western gateway planning proposals.</p>	Noted.
		<p>Heritage I disapprove of the changes to the allowable bulk and height for block C that this rezoning proposal is all about. The Adina Hotel building is a lovely building, the appearance of which will not be enhanced by the superposition a 40+storey building on top of it. It will also suffer from the height and bulk of Block A and B and so will Central Station.</p>	Please refer to Section 4.2.1 of the RtS Report relating to height, scale and density.
		<p>Built form Even though, the Central station buildings viewed from somewhere like Belmore Park, will no doubt appear dwarfed by tower A and C especially since the plan indicates a distance of only 14 to 16 m between the 2 buildings.</p>	Please refer to Section 4.4.3 of the RtS Report relating to visual and view impacts.
		<p>Photomontages The assessments for streetscape views have been conveniently done from points which show the future situation in its best light.</p>	Please refer to Section 4.4.3 of the RtS Report relating to visual and view impacts.
		<p>Unsuitable for pandemic I also fail to understand the need for more office or retail or hotel space in the current situation.</p>	Please refer to Section 4.6 of the RtS Report relating to responding to the COVID-19 pandemic.
		<p>One would think Tech hubs do not require various businesses to work in geographical proximity since they have to best of technology available to keep them connected. Something many other businesses have been achieving during this pandemic.</p>	Please refer to Section 4.6 of the RtS Report relating to responding to the COVID-19 pandemic.
9	Anonymous	<p>Pedestrian connectivity The DARLING DIVE railway Tunnel from Mortuary Station to Darling Harbour contains significant historic items such as the original convict sandstone tunnel and the remnants of the Gauntlet track (important to train aficionados) runs under the project near LEE St. There does not appear to be adequate pedestrian connectivity with the whole project (A, B, and C) at surface and subterranean levels,</p>	Please refer to Section 4.3.2 of the RtS relating to pedestrian movement, public domain and open space.
10	Anonymous	<p>Urban renewal Support the vision for this area to be a new tech hub</p>	Noted.
		<p>Pedestrian connectivity Please consider ways in which Chippendale can be better linked to Prince Alfred Park, Central Station and Surry Hills, for example by way of new tunnels or other pedestrian and cycle ways linking Lee Street to Chalmers and Elizabeth Streets.</p>	Please refer to Section 4.3.2 of the RtS relating to pedestrian movement, public domain and open space.
		<p>Amenity</p>	Please refer to Section 4.3.2 of the RtS relating to pedestrian movement, public domain and open space.

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		<p>Please also consider greening this area with new street trees and rain gardens, increasing pedestrian amenity, widening footpaths and reducing traffic. Increasing amenity with density is important to bring the community along in the process.</p>	
		<p>Open space</p> <p>Please consider expediting the coverage of the train tracks between Central and Redfern, and the conversion of this space into public/community space, green space and commercial space. These tracks currently cut this part of the city down the middle and make getting around this part of town difficult.</p>	<p>The public domain is comprehensively addressed in the Publicly Accessible Space Strategy at Appendix H. The coverage of train tracks and their use as open space and commercial space is not proposed.</p>
11	Zane Maber	<p>Heritage</p> <p>"Why is it that this building is to involve the demolition of heritage and the building over/inside of heritage areas?</p> <p>The Central/Sydney Terminal section of land including Belmore Park is one of an increasingly fewer number of areas that remains untouched from high-rise buildings and the increasingly dumb property race to the sky in Sydney. The proposed buildings are absolutely horrendous aesthetically, and completely ruin the look of the lovely sandstone buildings that comprise Central station.</p> <p>The fact that heritage of the area (the 'Central State Significant Precinct') is having to be rezoned tells you exactly how stupid this is. That you are having to be underhanded to even consider this project is beyond belief, and the fact that the building looks so utterly out of place is an even further insult."</p>	<p>Please refer to Section 4.1.2 of the RtS Report relating to responding to existing heritage.</p>
		<p>Surely there are other buildings that could be either knocked down and rebuild of much, much less significance and visual impact, or another area of Sydney entirely where this could be considered? Or are you all just blinkered by the old green bills?</p>	<p>Please refer to Section 4.1.2 of the RtS Report relating to responding to existing heritage.</p>
12	Katia Falcop	<p>Stop the f uglification of my city!</p>	<p>Noted.</p>
13	Bronwyn Hannah	<p>Heritage</p> <p>The construction of high-rise towers at the site from a heritage perspective, will overwhelm the historic appearance of this very special place by their outsized scale.</p>	<p>Please refer to Section 4.1.2 of the RtS Report relating to responding to existing heritage.</p>
		<p>Sustainability</p> <p>From a sustainability perspective, the construction of high-rise towers at the site represents a huge outlay of building materials and energy to create massive new commercial space that may be unnecessary and even uneconomic in the changed city conditions post-covid.</p>	<p>Please refer to Section 4.5 of the RtS Report relating to sustainability.</p>
		<p>Open space</p> <p>From a public interest perspective, the high-rise towers are being constructed on public land without clear compensation to the public purse, and thus appear to be another example of privatisation of public assets without a justifiable business case.</p>	<p>Toga is the long-term leaseholder of the land in Block C which includes the Adina Apartment Hotel and Henry Deane Plaza. Toga's long-term leases include redevelopment rights.</p> <p>In 2019, Toga lodged an Unsolicited Proposal (USP) with the NSW Government to develop the site and their proposal advanced to Stage 2 of the USP process in November 2019. The NSW Government's USP process is designed to encourage non-government sector participants to approach government with innovative commercial proposals, where the government has not requested a proposal and the proponent is uniquely placed to provide a value-for-money solution.</p> <p>Transport for NSW is the lead agency in Toga's Stage 2 USP and will guide Toga in developing a proposal that is aligned and integrated with the Government's vision for Central Precinct and can be assessed against the USP assessment criteria. At the end of Stage 2, Transport for NSW will assess the Detailed Proposal along with the Department of Premier and Cabinet and NSW Treasury. Government will then review whether the proposal should advance to Stage 3 of the USP process.</p>

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
14	Anonymous	<p>Height</p> <p>I strongly object to raising the height limit for Block C of the Western Gateway sub-precinct of the Central State Significant Precinct. This proposal is due to yet another 'Unsolicited Proposal' by a developer, (TOGA) who frankly only care about profits and nothing about loss of amenity, ambience and lifestyle for those living or visiting this area.</p>	Please refer to Section 4.2.1 of the RtS Report relating to height, scale, and density.
		<p>Heritage</p> <p>The proposal has troubling negative heritage implications for the State-heritage listed Central Station and its Clock Tower, as well as the former 1906 Inward Parcels building.</p>	Please refer to Section 4.1.2 of the RtS Report relating to responding to existing heritage.
		<p>Built form</p> <p>It seems that the proposal also appears to only provide a 12-metre building separation from Atlassian's proposed tower complex application.</p>	Please refer to Section 4.2.2 of the RtS Report relating to building setbacks and separation.
		<p>Amenity</p> <p>The Community and visitors need more essential green canopy and less Hi Rise Ugly, overpriced, ghetto buildings which reduce the sunlight and over shadow the whole area.</p>	Please refer to Section 4.4 of the RtS Report relating to amenity.
		<p>This needs to be rejected as the City and Central is already over built and the traffic and noise is strangling our once beautiful City.</p>	Please refer to Section 4.2.1 of the RtS Report relating to height, scale, and density.
15	Anonymous	<p>Consultation</p> <p>There is mention that community consultation shows 'support of this work' however this actually refers to the public desire to activate the precinct suitable to the character and heritage values, and not to build high rise development envisioned by this proposal.</p>	Please refer to Section 4.1.2 of the RtS Report relating to responding to existing heritage.
		<p>Heritage</p> <p>Proposals for 200+ meter towers adjacent and above the state heritage listed Post Office and within the state significant precinct of Central is absurd and reckless.</p>	Please refer to Section 4.1.2 of the RtS Report relating to responding to existing heritage.
		<p>If the vision is to be world class and internationally comparable with this proposal – unfortunately we will be a laughing stock. London, NYC, Paris even Melbourne wouldn't treat their state significant historic buildings and precincts in this way.</p>	Please refer to Section 4.1.2 of the RtS Report relating to responding to existing heritage.
		<p>Western Gateway proposals have been fast tracked without a masterplan in place for the heritage precinct and bare no relation to heritage character, setting and values that make up the core reasons for its listing on the SHR.</p>	Please refer to Section 4.1.2 of the RtS Report relating to responding to existing heritage.
		<p>"The proposal is not consistent with Parcels Post CMP policies which state that (among other things): Alteration of the form or detail of the openings to the three main facades should not be permitted; New works must be reversible and be designed in such a manner as to complement the neoclassical vocabulary used throughout the Sydney Terminal Complex; The external facades and roofs capes must be conserved with no new openings permitted etc."</p>	Please refer to Section 4.1.5 of the RtS Report relating to site-specific conservation management plans.
		<p>Technical reports</p> <p>Technical reports throughout relating to heritage, visual impact assessment etc refer to and assume adjacent Atlassian tower has been built and that further site erosion via Central Square is a 'done deal'. This is not how proposals are assessed under the EP&A Act, otherwise they should be assessed together to understand the full impact.</p>	<p>It is noted that Block A (Atlassian) and Block B (Dexus-Frasers (the Consortium)) were rezoned in August 2020 and will enable the delivery of Atlassian's new global headquarters and a significant redevelopment proposal from Dexus and Frasers.</p> <p>As part of preparing the rezoning proposal for Block C, a requirement from the NSW Department of Planning, Industry and Environment was to demonstrate a cumulative analysis of the impacts of Blocks A, B and C has been undertaken. To do this, technical analysis supporting the rezoning proposal (e.g. heritage and visual impact) took into consideration of the future context change anticipated for the Western Gateway sub-precinct based on the approved rezoning of Blocks A and B.</p>

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		The Urbis assessment of 'acceptable and manageable visual heritage impacts' are totally wrong in my professional opinion. The heritage assessment I call for an independent peer review of their work.	Noted. The Heritage Impact Statement prepared by Urbis in support of the Block C rezoning proposal has been prepared in accordance with the NSW Heritage Division guidelines 'Assessing Heritage Significance', and 'Statements of Heritage Impact'. The philosophy and process adopted is that guided by the Australia ICOMOS Burra Charter 1999 (revised 2013).
		"Urbis misrepresent heritage values and conservation policies in the Conservation Management Plan for Central Station and the Parcel Office Conservation Management Plan. They staggeringly advise that the tower proposal is consistent with Central CMP policies which absolutely not true. The parcels post is core to the state heritage listing of Central precinct. The CMP states that a masterplan must be developed prior to major development so that these very buildings can be conserved not destroyed."	Please refer to Section 4.1.5 of the RtS Report relating to site-specific conservation management plans.
		"Urbis has reassessed the Parcels Post building as 'local significant' which is, again, grossly erroneous as per Burra Charter principles, Heritage Council guidelines, Central Station CMP and the SHR heritage listing. This building is 'core' to the state heritage precinct values and listing. I seriously question the rigour of heritage advice on this proposal and call for an independent peer review by ICOCOMOS."	Noted. The Heritage Impact Statement prepared by Urbis in support of the Block C rezoning proposal has been prepared in accordance with the NSW Heritage Division guidelines 'Assessing Heritage Significance', and 'Statements of Heritage Impact'. The philosophy and process adopted is that guided by the Australia ICOMOS Burra Charter 1999 (revised 2013).
		Built form Visual impacts are extreme and pushes Sydney further into becoming an ugly dark soulless hole.	Please refer to Section 4.4.3 of the RtS Report relating to visual and view impacts.
		COVID-19 pandemic Covid 19 has been an economic disruptor which has seen a shake-up in how we live, work and use our cities. Commercial and retail space across cities are at record high vacancy levels with major business failures across the board expected throughout 2021 and 2022. Recovery in this space, including tourism, is not expected for years. When a major proposal is put forward for a heritage site the 'justification and need' must be urgent and real. This proposal does not present a real long term economic need other than the short term boost a construction project brings. Empty new tower buildings on top of state heritage items will be the disgraceful result.	Please refer to Section 4.6 of the RtS Report relating to responding to the COVID-19 pandemic.
		Height The re-zoning to lift height restrictions should, under no circumstances, be approved.	Please refer to Section 4.2.1 of the RtS Report relating to height, scale, and density.
16	Mayling Hargraves	Technical reports I don't think a sufficiently clear proposal has been submitted for people to make a positive decision.	Noted.
		Western Gateway As it is part of such a big site, I believe the Sydney authority which covers it should produce a plan for the whole area.	In July 2019, the Central Precinct (inclusive of the Western Gateway sub-precinct) was declared a Nominated State Significant Precinct (SSP) by the Minister for Planning and Public Spaces (the Minister) because of its social, economic and environmental importance to the State. A planning process is currently underway for this area, with a draft Strategic Vision document being publicly exhibited between 17 October 2019 and 27 November 2019. This document sets out an overarching vision, identifies key themes and priorities, nominates parts of the precinct as sub-precincts, and provides direction on how the vision for the Precinct will be realised over the coming decades. A draft can be found on the NSW Department of Planning, Industry and Environment's website through the following link. https://www.planning.nsw.gov.au/Plans-for-your-area/State-Significant-Precincts/Central-Sydney-Precinct Notably, The Central Precinct SSP investigation area has been divided into sub-precincts to facilitate the future renewal in a manner that positively responds to the varying character of the surrounding area, with the Western Gateway sub-precinct identified by the Minister as being

Submission No. / ID	Submitter	Issue Raised	Response / Proposed Amendments
		<p>Photomontages The proposal may tick all the Local Authority boxes and others, but fails to show what is proposed visually, fails to show pictures of what is to be destroyed.</p> <p>Land use What's the point of building a multi storey office block where people have to face away from windows with views, because they cannot see their PC screens against the windows. It seems that office workers probably only need to go to an office 2 days a week. A working life is c. 50yrs, ie 20-70, rearing 2 children at home is c. 14 yrs assuming the children can get themselves to and from school once at secondary school. Build towers (if you want) where people would like to live.</p>	<p>appropriate for early assessment and consideration in advance of the broader Central Precinct Renewal Program. Whilst the detailed planning for the Western Gateway sub-precinct will progress separately and in advance to the remainder of Central Precinct, the Draft Strategic Vision will ensure that planning for this sub-precinct remains aligned and integrated with the overall vision of the renewal.</p> <p>Please refer to Section 4.4.3 of the RtS Report relating to visual and view impacts and Section 4.1.3 of the RtS report on Physical and structural impacts to heritage items.</p> <p>Please refer to Section 4.6 of the RtS Report relating to responding to the COVID-19 pandemic.</p>
17	Judith Lawson	<p>Built form This proposed rezoning is a blight on our Central Station and historic buildings in its surround. Why must every part of the city accept high rise buildings and many particularly ugly in my view.</p>	<p>Please refer to Section 4.1.2 of the RtS Report relating to responding to existing heritage.</p>