

One Carrington SSD and Concept Plan (Mod 2) Attachment D - Response to Other Agencies and Public Submissions

Comment	Response
Office of Environment and Heritage (Aboriginal Archaeology)	
<p><u>Modification to Approved Concept Plan at One Carrington Street, Sydney (MP09 0076 MOD 2)</u></p> <p>The EIS has not addressed Aboriginal cultural heritage issues and OEH notes that previous archaeological excavations at Wynyard (KENS, Wynyard Walk site) have encountered Aboriginal objects during excavations for construction. The Department should be aware that any subsurface works in relation to this modification have the potential to uncover Aboriginal objects. Any Aboriginal objects uncovered in this location will have a level of significance because they have survived in the Central Business District (CBD) and are indicative of continued Aboriginal occupation post contact.</p>	<p>The scope of the Concept Plan Modification did not necessitate further assessment of Aboriginal cultural heritage. An assessment of the Aboriginal Archaeological potential, including a process should objects be identified formed part of the detailed assessment undertaken with the concurrent SSD application (see Attachment FF of that EIS).</p>
<p><u>Transport Interchange, Commercial and Retail Development (SSD 5824)</u></p> <p>OEH notes that the applicant has prepared an Archaeological Assessment and Impact Statement. The approach to Aboriginal cultural heritage in this report is based on the OEH Due Diligence Code of Practice. The Department is advised that Due Diligence is a voluntary process that provides a legal defence against prosecution should Aboriginal objects that were not anticipated to be present be uncovered and impacted during the course of works. It is not an archaeological and cultural assessment and only relates to the National Parks and Wildlife Act 1974: therefore not appropriate for the assessment of state significant developments. However, the report identified that it is likely that Aboriginal objects may be present at this location. Any Aboriginal objects uncovered in this location will have a level of significant because they have survived in the CBD and are indicative of continued Aboriginal occupation post contact. The recommendations of the report state that an archaeological methodology should be prepared for both Aboriginal and historic archaeology in order to allow for identification of any archaeological remains and provide management and mitigation options. OEH concurs with the approach, however it is noted that it is also recommended that Aboriginal archaeological excavations should be undertaken in accordance with the OEH Code of Practice for Archaeological Investigation of Aboriginal Objects In NSW. This code of practice was designed to be part of an assessment process to obtain an Aboriginal Heritage Impact Permit. It has a very prescriptive methodology and is very limited in its scope. OEH considers that it is not appropriate to be used in this instance and that more suitable methodology should be designed to allow for maximum flexibility on site and to ensure any excavations provide appropriate mitigation.</p>	<p>As the project DGRs did not specify any assessment for Aboriginal heritage, the Archaeological Assessment took a due diligence approach, as the current standard to determine whether further assessment and/or management were required. It is acknowledged that this approach is specific to the NPW Act 1974, and a precursor to more appropriate Aboriginal heritage management. The recommendations (GML March 2014: Section 9.2.1) determine that specific excavation management documents should be prepared. These documents should include a determination of potential Aboriginal heritage value associated with this site (acknowledging that there is no opportunity to determine whether Aboriginal values can be connected to a physical archaeological resource at this site without undertaking archaeological excavations).</p> <p>The recommendations as stipulated in the GML report detail following the OEH Code of Practice as the current best practice document. This was included to provide standards for excavation, analysis and reporting. As OEH have identified, Aboriginal sites located with Sydney CDB are notoriously difficult to excavate, and practically impossible to excavate following the specific methodologies of the Code of Practice. As such, OEH's determination that a site specific excavation methodology should be developed is noted and should be included as a future requirement for the project.</p> <p>In summary, future heritage reporting for Aboriginal heritage should include an assessment of potential Aboriginal heritage values, which is used to underpin a site specific archaeological excavation methodology. Methodologies proposed should be based on the Code of Practice, as and where feasible.</p>
Office of Environment and Heritage (European Heritage)	
<p>The information submitted with the application is noted. However, it is considered that the Heritage Impact Statement submitted with the application does not include adequate response to the following issues previously identified at the Concept Plan stage:</p>	<p>It would appear that OEH did not review the specific Archaeological Assessment provided at Appendix FF of the EIS. A response to its specific issues are provided below.</p>
<p>1. The impact assessment should include the impact of the removal of remaining significant internal elements from Shell House on its heritage significance. It is understood that the Concept Plan approval related to the building envelope only. Therefore, a detailed heritage</p>	<p>The Concept Plan did in fact approve the demolition of the internal structure of Shell House. The DA seeks to retain more of the structure than currently approved for demolition and will therefore have a lesser impact than that approved under the Concept Plan. A detailed assessment of the removal of these elements from Shell</p>

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impact assessment should be submitted at this stage in relation to the removal of significant elements from Shell House;	House is provided at Section 6.2.1 of the HIS at Appendix T of the EIS.
2. The heritage impact assessment should include detailed discussion of potential archaeology on the site and any impacts on this archaeology; and	A separate Archaeological Assessment was prepared for the DA and was included at Appendix FF of that EIS. The Archaeological Assessment provides a detailed discussion on the potential archaeology on the site and found that the site has a low potential. The Assessment also provides recommendations which have been adopted to deal with any archaeology should it be encountered during construction.
3. The Archaeological Zoning Plan for Central Sydney, 1992 identifies areas of Wynyard Park as having 'Archaeological Potential'; however, this is not discussed in the documentation. It is understood that works under Carrington Street and areas to its west are going to be subject to a separate application and such assessment will be part of the application at that stage.	See above.
Environmental Protection Authority (EPA)	
Thankyou for providing the EPA with the opportunity to review and provide comment on this State Significant Development Application. The EPA is not the appropriate regulatory authority for this project. The EPA has no comments on the Development Application or EIS.	Noted.
Sydney Airport Corporation Limited	
Sydney Airport provided the Federal Department of Infrastructure & Regional Development's determination for the One Carrington Development.	Noted.
Ausgrid	
Ausgrid is already in the process of agreeing a connection application with the proponent for the development at One Carrington Street therefore no submission is proposed through your department.	Noted.
Sydney Water	
Water <ul style="list-style-type: none"> The drinking water mains available for connection is the 250mm main on the Eastern side of Carrington Street or the 300mm main on the Western side of George Street The 150mm drinking main in Wynyard Lane maybe disconnected and disused The proposed drinking water infrastructure for this development will be sized & configured according to the Water Supply Code of Australia WSA 03-2011-3.1 (Sydney Water Edition - 2012). 	Noted. Brookfield will continue to engage with Sydney Water during the development process.
Wastewater <ul style="list-style-type: none"> The wastewater main available for connection is the 225 mm main constructed under WN 303838 The proposed development site is traversed by a 400mm wastewater main Where proposed works are in close proximity to a Sydney Water asset, the developer may be required to carry out additional works to facilitate there development and protect the wastewater main. Subject to the scope of development, servicing options may involve adjustment/deviation and or compliance with the Guidelines for building over/adjacent to Sydney Water assets. Refer to your WSC for details of requirements. 	Noted. Brookfield will continue to engage with Sydney Water during the development process.

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Attachment 1: Sydney Water Servicing	Noted. Brookfield will obtain a Section 73 Compliance Certificate at the relevant stage.
Attachment 2: Requirements for Business Customers for Commercial and Industrial Property Developments	Noted. Brookfield will meet all the necessary requirements for trade waste water, backflow, and water efficiency as part of its detailed design.
Public 1: Name Withheld	
For a such an important site in Sydney, I would expect something better than what is planned at the moment. The site is capable of hosting a far taller tower which can provide even more office space to cater for demands by businesses. The proposed tower is far too short in my view. The initial design of the tower is appalling. There needs to be a tower iconic in design and I expect in stage two a better designed tower.	The envelope of the proposed tower is informed by the Concept Plan Approval, which was constrained by the overshadowing impacts on the GPO steps and façade, and therefore the building cannot be taller. The design of the building is the outcome of an international Architectural Design Competition and will provide an iconic building.
Public 2: Memocorp	
Building Envelope We object to the current proposal of the proposed development is too bulky due to excessive FSR & building height.	The building envelope is determined by the Concept Approval. The proposed development is generally consistent with the Concept Approval and complies with the approved maximum height and GFA control (as modified).
Excessive GFA We object to excess GFA, current submitted 84,621m ² vs Concept Plan approval of 79,370m ² for the section of the site being development located east of Carrington Street.	A concurrent Concept Plan Modification was lodged with the SSD to increase the maximum GFA for the development. The increase was proportionate to the increase in site area from incorporating 285 George Street into the development.
Overshadowing We strongly object the additional overshadowing impacts of the detailed design of the proposed building are not within the shadow impacts assessed as part of the Concept Plan and that there should absolutely no additional overshadowing to Wynyard Park and also our own building 11-31 York Street, Wynyard Green, Sydney. Missing in the current submission are proper Wynyard Park Shadow Diagram Analysis including elevation shadow studies on both Wynyard Park and our Heritage Sensitive Railway House and Transport House facades and should be independently verified.	The shadow impacts of the proposed development on Martin Place and Wynyard Park are either consistent with or less than those assessed and approved under the Concept Plan. There was no requirement, nor is it appropriate to provide elevational studies on Wynyard Park, Railway House or Transport House.
Volume of the Transit Hall Space The current proposal of the both the volume of the transit hall space & through site link is severely reduced & compromised. The detailed design of the commercial building lobby is to be reconfigured or relocated to upper levels of the commercial tower, to consider the impact of the floor space in relation to both the both the volume of the transit hall space & through site link, and the spatial experience as pedestrians move through the space between George and Carrington Street. Reducing and reconfiguring the foyer floor space are critical. It's imperative that the current proposal required to be modified & resubmitted for the commercial foyer space is to demonstrate that the floor space shall not impact from the sense of grandeur of both the transit hall space & through site link, and does not obstruct sightlines for pedestrians moving through the space to the street. Maximising the volume of space and natural light penetration through the ground plane, in order	The volume and design of the Transit Hall space is the outcome of significant design analysis and testing to produce the best outcome for the site. See further discussion in the Response to the Department of Planning and Environment's Key Issues at Attachment A .

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<p>to increase the visibility of Wynyard Park from George Street, ease the pedestrian flows and increase sightlines between the concourse and George Street and George and Carrington Streets. This would include: increasing the height of the soffit to the underside of the plant room, ensuring clear runoff from lifts, particularly on George Street, by reducing the width of the retail frontage, and also on the Carrington Street and concourse levels by reconfiguring of the plan; reconfigure to have shuttle lifts provision to have tower commercial lobby & foyer at higher level, introducing transparency to the lift pits, increasing the width of the Carrington Street/George Street connection.</p> <p>Widening the Carrington Street/George Street public entries, to optimise flow and sightlines (including access to disabled lifts).</p>	
<p><u>Tower Facade & Building Envelope</u></p> <p>The proposed tower facade & building envelope detailed design of the building elevations or lack of it departs from the sensitivity of the 3D building envelope & articulation in the approved Concept Design scheme.</p> <p>DoP should object to the current proponent detailed design of the building facade as in its current form.</p>	<p>The Concept Plan design was only ever an indicative scheme. The proposed tower facade and building design is the outcome of an Architectural Design Competition and represents the refinement of those design principles established by the Concept Plan.</p>
<p><u>Carrington Street Frontage Set Back</u></p> <p>We do not support removal of the 4m set back provision at ground floor level from Carrington Street site boundary to provide the continue the existing colonnade to southern end of Carrington Street.</p> <p>Continuous 4m width undercover provision must be provided to eastern side of the Carrington Street to Transit Hall.</p>	<p>There is no requirement in the Concept Plan to provide a 4m ground level setback on Carrington Street. Council's DCP does not support the provision of colonnades. With heritage items on either side of the Carrington Street frontage of the new building (Shell House and Lisgar House) it would never be possible to continue the colonnade along Carrington Street and therefore it provides no benefit.</p>
<p><u>Wynyard Lane</u></p> <p>We strongly object any closure of Wynyard Lane at the northern and southern boundaries of the site as indicated and is a Public Domain objective under the approved Design Criteria. The development must also improve pedestrian permeability and activation of the laneway.</p> <p>Furthermore the current design of the Wynyard Lane is unacceptable with "under the tunnel" like without sensitive design and consideration of Lane activation policy of CoS DCP</p>	<p>MemoCorp's support of keeping Wynyard Lane open is noted. The proposed development seeks to achieve this outcome.</p> <p>It is also noted that significant public domain upgrades are proposed to Wynyard Lane are proposed as part of the DA as well as provision of additional activation on the laneway. Further the bridge over the top of the lane, which is necessary for access, has been designed to be open and glazed in order to provide further activation to the lane than would otherwise be provided if there was no structure over the lane.</p>
<p><u>Car parking Spaces</u></p> <p>We object to any increased number of car parking spaces from the Concept Plan approval of 81 tenant car parking spaces to be provided on the section of the site being development located east of Carrington Street.</p>	<p>The increase in car parking is proportionate to the increase in site area proposed and could otherwise be achieved under Council's LEP.</p>
<p><u>Shell House roof top Bars & Restaurants</u></p> <p>We strongly object Shell House roof top bars & restaurants provision to this area of the CBD precinct for concern with crime, security, vandalism, noise and privacy impact, and its proximity to our major tenant's Navitas education precinct at our 11-31 York Street, Wynyard Green.</p>	<p>A separate DA will be lodged for the future use of the Shell House rooftop. The impacts of the rooftop use will need to be assessed as part of that application.</p>
<p><u>Unable to ascertain the proper scope and extent of the Railcorp Wynyard Station upgrade and development abutting our properties (west of the eastern alignment of Carrington Street)</u></p>	<p>The scope of the upgrade to Wynyard Station forms part of a separate application being undertaken by Transport for NSW. Transport for NSW announced the \$100 million upgrade on 5 May 2014.</p>

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<p>From the submission, we are unable to ascertain the proper scope and extent of the RailCorp Wynyard Station upgrade and development abutting our properties.</p> <p>However, we did observe in the submission these are to be proposed by Transport NSW in the future under a separate approval process.</p> <p>As this Proponent submission's commercial tower is attributed from TfNSW/RailCorp. We have major concern on not fully aware the full extent, scope and impact of the proposed development including TfNSW/RailCorp Wynyard Station areas on to our property.</p> <p>We require DoP to sort above additional information from both the Proponent and TfNSW/Railcorp, and assist to arrange an immediate briefing session to both ourselves including our Consultants to enable us to fully appraise both the current Proponent submission and TfNSW/Railcorp future redevelopment works.</p>	