Response to Submissions
Section 75W to Concept Plan (MP08_0116)

UTS City Campus, Broadway Precinct
GFA and Building Envelope Amendments

Submitted to Department of Planning and Environment
On Behalf of University of Technology Sydney

November 2015 ■ 13304

JBA Urban Planning Consultants Pty Ltd ABN 84 060 735 104 / North Sydney t +61 2 9956 6962 w jbaurban.com.au

JBA Urban Planning Consultants Pty Ltd operates under a Quality Management System. This report has been prepared and reviewed in accordance with that system. If the report is not signed below, it is a preliminary draft.

This has been prepared and reviewed by:

Alexis Cella 18/11/2015

Contents

Figures

Contents

Appendices

1.0 Introduction

An Environmental Assessment Report (EAR) for modifications to the approved Concept Plan at UTS City Campus, Broadway Precinct was publicly exhibited for a period of 48 days inclusive between 27 August 2015 and 12 October 2015 (MP08_0116 MOD 5).

In total, five (5) submissions were received in response to the public exhibition of the EAR. The submissions were all from government agencies, with no submissions received from the general public:

- City of Sydney Council;
- Heritage Council;
- Sydney Water;
- Roads and Maritime Services; and
- Transport for NSW.

The Department of Planning and Environment (the Department) has also prepared a letter setting out additional information or clarification required prior to final assessment of the modification application.

The proponent, University of Technology Sydney (UTS) and its specialist consultant team have reviewed and considered all issues raised.

This report, prepared by JBA on behalf of the proponent, sets out the responses to the issues raised in the submissions, and details the final modifications and final Statement of Commitments for which approval is now sought. The final proposed modifications include changes to address matters raised in the submissions.

The report provides a detailed response to all of the issues raised by the various government agencies.

The key issues raised in the submissions relate to:

- Built Form; and
- Public Domain Visual Impacts.

This report provides a detailed response to these issues and outlines the proposed amendments to the exhibited Environmental Assessment Report. Where individual issues are not discussed in this report, a detailed response can be found in the table at **Appendix A**.

1.1 Amendments to Proposed Modification Application

A range of updated plans and documentation has been prepared to reflect the changes that have been made to the proposed modification application following public exhibition of the proposal and to address issues raised in the submissions.

The revised plans include Indicative Design Perspectives prepared by fjmt.

The following consultants' reports and supporting information has been updated or further supplement the material originally submitted in support of the EAR:

- Detailed Response to Submissions, prepared by JBA;
- Indicative Design Report, prepared by fjmt;
- Addendum Wind Assessment, prepared by CPP;
- Revised Final Statement of Commitments, prepared JBA;
- Revised Final Urban Design Principles, prepared by JBA;
- Revised Final Design /quality Controls, prepared by JBA;
- Amended Concept Plan Drawings, prepared by fjmt; and
- Addendum Visual Impact Assessment, prepared by Architectus.

The revised supporting documentation enables the Department to undertake an informed assessment of the amended proposal.

This report should be read in conjunction with the EAR prepared by JBA, dated July 2015, as relevant.

1.2 Background

Since the modification application was lodged in July 2015, the proponent and its consultant team have been further testing and developing its concept design through to schematic design (within the parameters set by the proposed amended concept plan envelope).

As is the nature of going from concept to schematic design, the parameters of the overall envelope have provided the framework in which the building design is being developed. During the development of the design there have been a number of refinements being considered by UTS which will result in a building form that will sit well within the envelope. An indicative design scheme has accordingly been developed by fjmt and adopted in support of this modification application (refer to **Appendix B**).

The indicative design scheme importantly addresses the key issues and comments raised by the City of Sydney within its submission on the modification application.

The process of developing the detailed design has also included review and input from the UTS Central Project Control Group (PCG). The purpose of the PCG includes review in regard to meeting Design Excellence requirements and maintaining the standard of design achieved in the three major buildings recently completed on the UTS City Campus (being the Faculty of Science and Graduate School of Health Building, The Dr Chau Chak Wing Building, and the Faculty of Engineering and IT Building). The PCG meets bi-monthly, and membership includes representatives of the UTS Executive and Professor Desley Luscombe[1] - Dean UTS Faculty of Design Architecture and Building. Outside of the PCG process, Professor Luscombe has also provided additional review and guidance to the design team.

[1] *Desley Luscombe is Professor and Dean of the Faculty of Design, Architecture and Building at the University of Technology, Sydney. As Dean, in the past ten years Desley has refocused the Faculty at UTS leading the staff in the development of a unique vision as a research and creative practice collaborative. Her teaching crosses the disciplines of the history of twentieth-century architecture, design studio, and architectural drawing. Her research focuses on the politicising of architecture through its drawn representation. She is currently completing a book on the use axonometric drawings in the late twentieth century.*

In parallel and from 1977-2003, as Founding partner and Consultant of Campbell Luscombe Architects of Sydney, she collaborated in the design and presentation of architectural projects winning several national architectural and industry awards. Campbell Luscombe Architects is a group having developed significant expertise in aged care and seniors living.

In combining her academic and professional roles she served as a Councillor for the Royal Australian Institute of Architects (1992-2002), Member of the NSW Council of Professions (2000-2002), Editor of The Architecture Bulletin (1992-1995), Chair of the State Education Board of the RAIA (1997-1998) and State Representative and Deputy Chair of the National Education Committee RAIA (1999-2001), President of the Society of Architectural Historians Australia and New Zealand (1995-1997), Editor of Fabrications: JSAHANZ (1988-1992), and a Member of the Editorial Boards for Architectural Theory Review (1997-1999) and the Journal of Potential Architecture (2000-present).

2.0 Key Issues and Proponent's Response

This section of the report provides a detailed response to the key issue raised by the Department of Planning and City of Sydney Council, relating to Built Form and Public Domain Visual Impacts.

A response to each of the individual issues raised by the Department and other authorities is provided in the table at **Appendix A**.

2.1 Built Form

2.1.1 Issue

Council raises concern over the separation distance provided between the proposed addition to Building 2 and the Building 1 tower, suggesting that the separation distance should be increased to ensure that the setting of Building 1 tower is more clearly defined.

Council also recommends that the eastern side of Jones Street should maintain a low scale street wall, responding to the scale of the nearby heritage listed former Sydney Technical College Building (Building H).

The Department also requests further analysis and consideration of greater building separation and a lower street wall.

2.1.2 Proponent's Response

Building Separation

Through a natural progression in the design development of Building 2, it has become evident that an enhanced outcome from an urban design and built form perspective will be realised with the form of the building significantly rotating away from Building 1 tower above the podium level.

Figure 1 below illustrates diagrammatically the approach to the indicative design and how this compares to the proposed building envelope. The eastern setbacks for Building 2 now under consideration in the indicative design from Building 1 are (refer to **Figure 2**):

- At Level 9 approximately 10.5m from Building 1 at the northern corner and approximately 13m to the south; and
- At level 17 (roof level) approximately 14m from Building 1 at the northern corner and approximately 19m to the south.

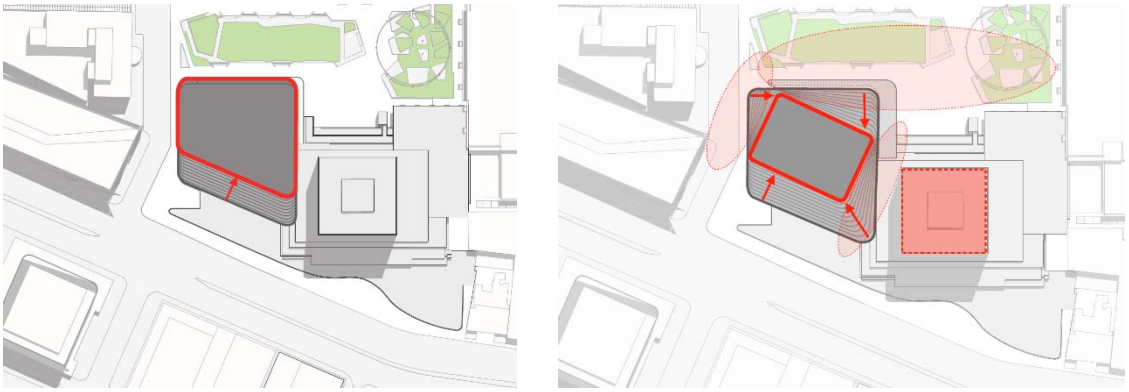

Figure 1 – Comparison of proposed modification envelope (left image) and indicative design scheme (right image)

Source: fjmt

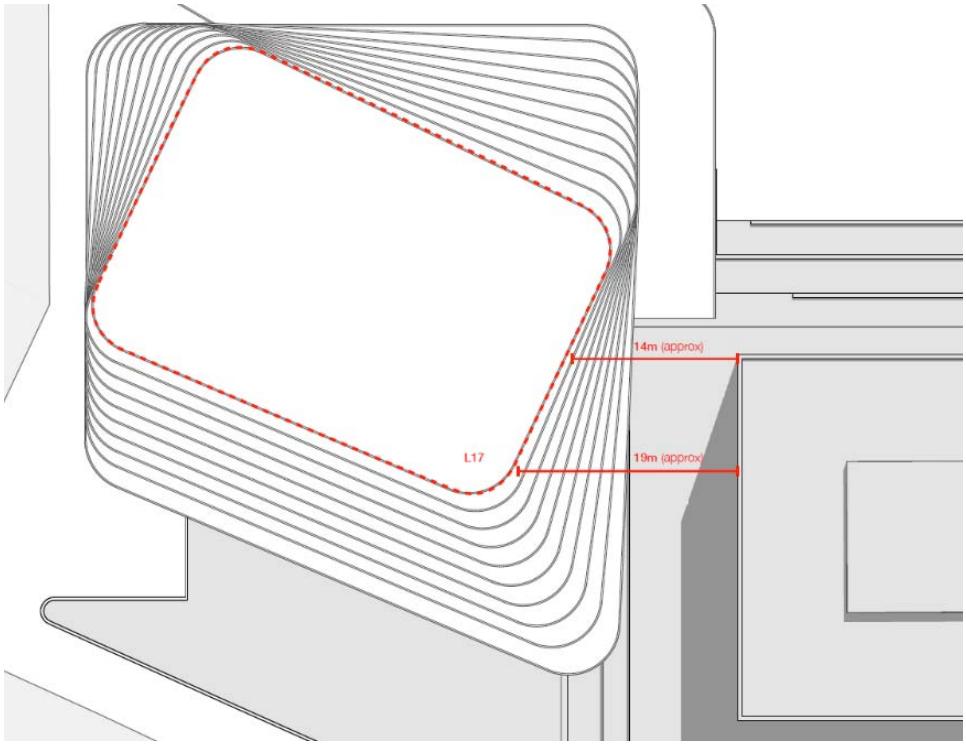

Figure 2 – Proposed increased building separation (roof level)

Source: fjmt

This adjusted form of Building 2 and the increased setback ensures that greater separation is achieved to the Building 1 tower and that the setting and importance of Building 1 tower is respected.

Figures 3 and 4 below enable a comparison of the proposed building envelope against the current indicative design scheme and clearly demonstrate that the increased separation between Building 1 tower and Building 2 support a clearer appreciation of each individual building from both local and wider contexts. Whilst the proposed building envelope is not proposed to be amended, it is proposed to add a new Design Quality Control to the Concept Plan to ensure this important urban design principle is carried forward in the detailed design of the project.

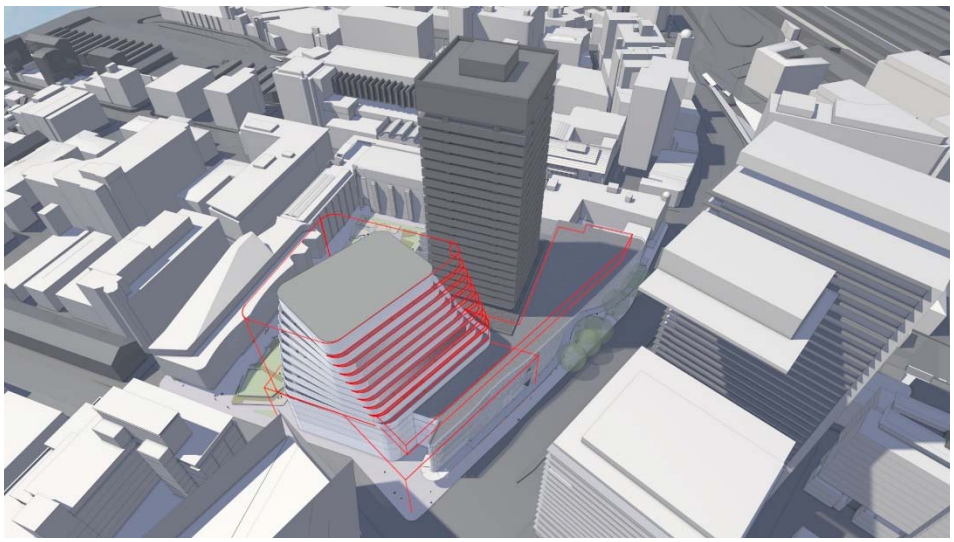

Figure 3 – High level 3D perspective comparing modification envelope (red outline) and indicative design scheme

Source: fjmt

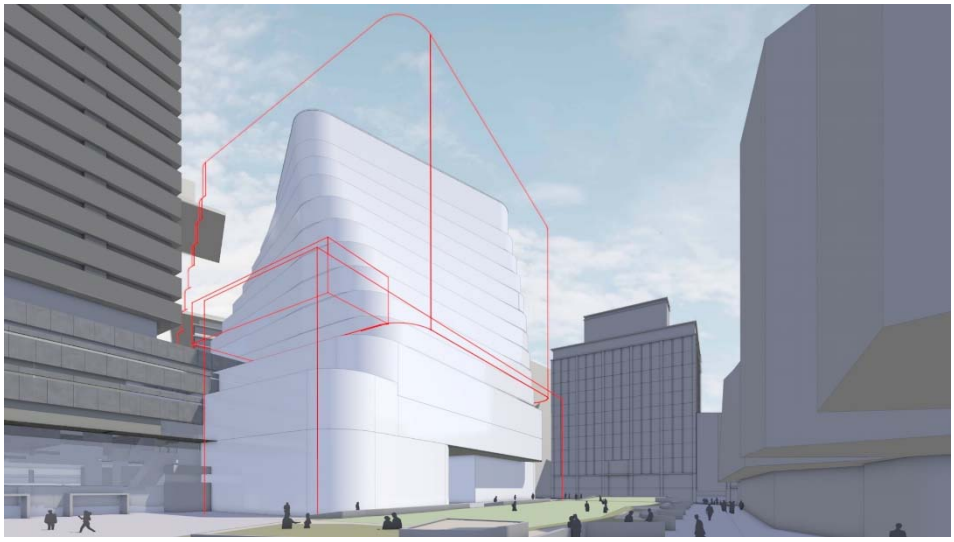

Figure 4 – Alumni Green 3D perspective comparing modification envelope (red outline) and indicative design scheme

Source: fjmt

Jones Street

As a flow on effect of the rotating of Building 2 within the indicative design scheme, the form is progressively setback from Jones Street as the building increases in height. The incremental stepping back of the form begins at level 7 which helps to more clearly define the street wall along Jones Street and Alumni Green. **Figure 5** provides a simple illustration of the progression in the design from the modification envelope to the indicative design scheme and how a low scale street wall is being established and supported along Jones Street.

Figure 5 – Design progression in Building 2 form from modification envelope to indicative design

Source: fjmt

The progressive stepping back of the indicative design scheme form from Jones Street also provides much greater separation between the proposed Building 2 form and Building 10 giving this building improved visual prominence.

Figures 6 and 7 below enable a comparison of the proposed building envelope against the current indicative design scheme and clearly demonstrate that an appropriate response to the Jones Street scale of buildings is achieved. Whilst the proposed building envelope is not proposed to be amended, it is proposed to add a new Design Quality Control to the Concept Plan to ensure this important urban design principle is carried forward in the detailed design of the project.

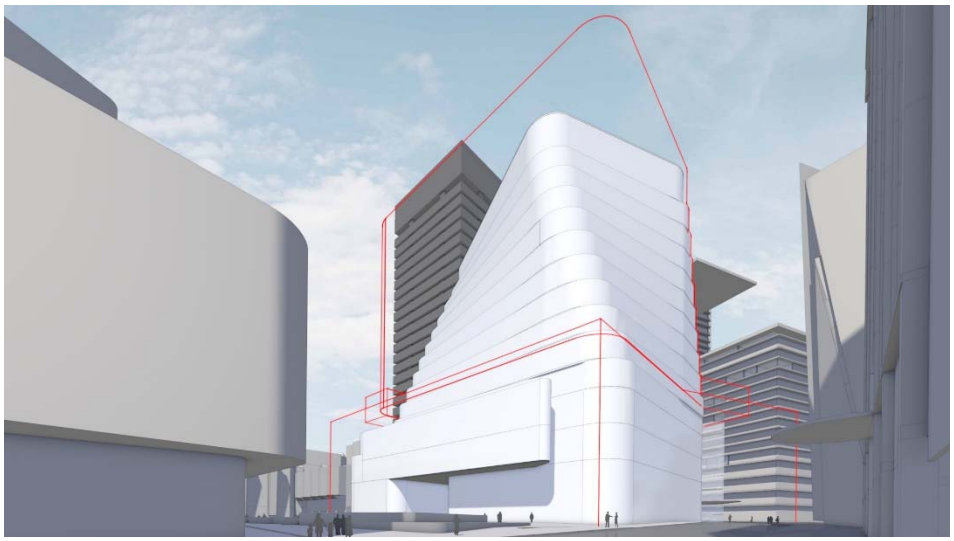

Figure 6 – Jones Street 3D perspective comparing modification envelope (red outline) and indicative design

Source: fjmt

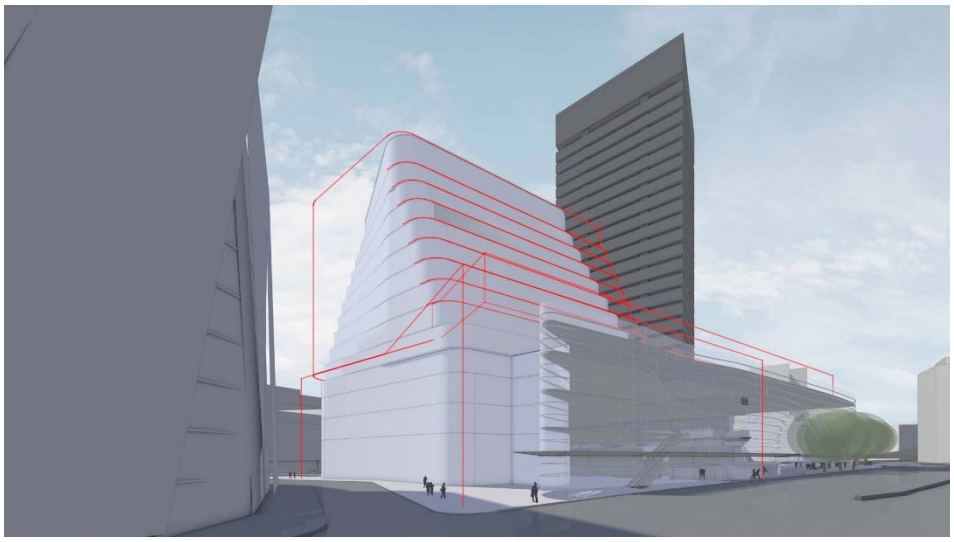

Figure 7 – Broadway 3D perspective comparing modification envelope (red outline) and indicative design

Source: fjmt

2.2 Public Domain Visual Impacts

2.2.1 Issue

Council consider that the proposal compromises the value of Balfour Street by reducing the view to open sky and creating a solid wall of built form at the termination of the street.

Council therefore recommend that the modification to the approved envelope should be amended to acknowledge the eastern alignment of Balfour Street, and to retain a greater view of sky above the approved Building 2 podium.

2.2.2 Proponent's Response

Council's comments are noted, however these need to be considered in the context of the site's location on the fringe of the CBD along with pedestrian wind conditions (refer to **Appendix C**).

Figure 8 below provides an extract from the Visual Impact Assessment of the view corridor in question.

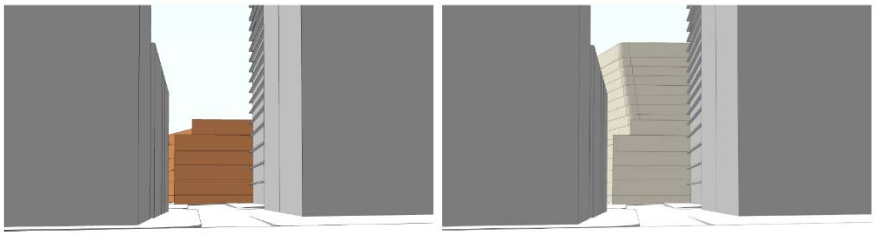

Figure 8 – Extract from the Visual Impact Assessment comparing the approved Building 2 envelope (left) and the proposed modified envelope (right)

Source: Architectus

One of the fundamental and key design refinements within the indicative design scheme is the pulling away of the podium floor plate from the corner of Jones Street and Broadway. This supports a more open and inviting northern access point into the Broadway Precinct and an improved outcome for the planned future pedestrianisation of Jones Street. Another benefit of this design refinement is that it enhances views from Balfour Street (softening and avoiding a sheer wall at the Broadway street alignment). Furthermore, the proposed stepping of Building 2 along Jones Street above the pedestrian street wall also provides increased access to views of the sky. Notwithstanding the above, wind considerations during the detailed design may require mitigation measures to be adopted which are consistent with these design principles (refer to **Appendix C**).

Figure 9 below enables a comparison of the proposed building envelope against the current indicative design scheme and clearly demonstrates the positive refinements being made in terms of improving northern views experienced from Balfour Street. Whilst the proposed building envelope is not proposed to be amended, it is proposed to add a new Design Quality Control to the Concept Plan to ensure these important urban design principles are carried forward in the detailed design of the project.

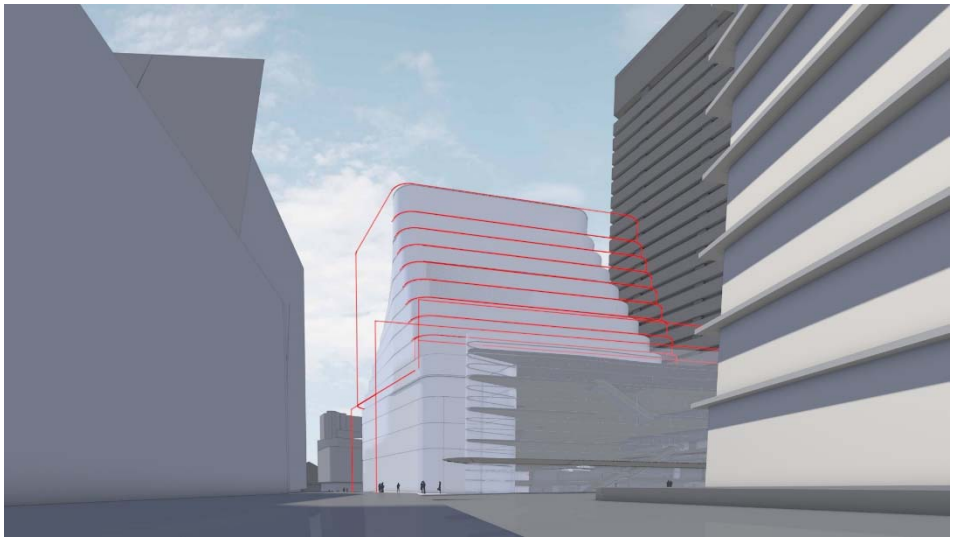

Figure 9 – Balfour Street 3D perspective comparing modification envelope (red outline) and indicative design

Source: fjmt

3.0 Proposed Amended Modification

Since public exhibition of the proposal, amendments have been made to the proposed modification application. The amendments are in response to the issues and comments raised by the Department and Council.

The following section presents a brief updated description of the amended modification application for which approval is sought.

3.1 Overview of Proposed Modifications

The amended Section 75W application seeks the following modifications to the approved Concept Plan:

- Increase in the approved additional GFA for Building 2 to 38,261m^2, comprising an increase of 31,511m^2;
- Expansion and amendment to the approved building envelope for Building 2, resulting in a maximum building height of 64.5m (RL 79.50) at Broadway, comprising an increase of 34.41m; and
- Consequential amendments to the Urban Design Quality Controls/Principles for Building 2 and Statement of Commitments.

3.1.1 Gross Floor Area

It is confirmed that as part of the detailed design for the UTS Central project that Building 2 is proposed to be demolished down to ground level and replaced with a building contained within the proposed modified building envelope (new Building 2 podium and additional floors above).

As identified within the original Concept Plan application, the existing gross floor area (Sydney LEP 2005 definition) of Building 2 is 22,096m^2 (this figure includes GFA within 2 basement levels) The Concept Plan included the approval of the expansion of Building 2, accommodating an additional 6,750m^2 of gross floor area. So in total, the Concept Plan allowed for an expanded Building 2 of some 28,846m^2 of gross floor area.

Taking this total gross floor area as 'approved', the modification application seeks a further 31,511m^2 of gross floor area to be accommodated within the additional floors above the approved podium. Therefore in total the 'approved' and proposed additional gross floor area for Building 2 is 60,357m^2 (28,846m^2 + 31,511m^2).

Accordingly the future state significant development application that includes the demolition (down to ground level) and construction of the new and expanded Building 2, will be for a building with a maximum total gross floor area of 60,357m^2. Therefore, in total the expansion to the Building 1 podium and new Building 2 will provide for a maximum GFA of 64,407m^2.

3.2 Proposed Modifications to the Approval

The above modifications necessitate amendments to the Concept Plan Approval. Words proposed to be deleted are shown in ***~~bold italics strike through~~*** and words to be inserted are shown in ***bold italics***.

SCHEDULE 2 PART A – ADMINISTRATIVE TERMS OF APPROVAL

A1 DEVELOPMENT DESCRIPTION

*Except as modified by this approval, Concept Plan approval is granted only to the carrying out of development solely within the Concept Plan area as described in the document titled "Environmental Assessment Report UTS City Campus Broadway Precinct Concept Plan" dated May 2009, as amended by the "Preferred Project Report UTS City Campus, Broadway Precinct Concept Plan" dated October 2009**, as modified by "Environmental Assessment Report UTS City Campus, Broadway Precinct Modification to Concept Plan" dated July 2015, and as amended by the "Response to Submissions" dated November 2015** prepared by JBA Planning Consultants. including:*

(a) New Broadway Building and Thomas Street Building, with a combined GFA of 44,650m^2;

*(b) Expansion of Building 1 **podium** and **new Building** 2, with a combined **~~additional~~** GFA of **~~10,800m^2~~** **64,407m^2**;*

(c) Expansion of Building 6 for the provision of student housing, with an additional 25,250m^2 GFA;

(d) Modifications to Buildings 3, 4 and 10;

(e) Modifications to Alumni Green, with a new Multi Purpose Sports Hall and book vault beneath;

(f) Public domain improvements to Broadway and Thomas, Harris, Wattle and Jones Streets.

A2. DEVELOPMENT IN ACCORDANCE WITH PLANS AND DOCUMENTATION

(a) The development shall generally be in accordance with the following plans and documentation (including any appendices therein):

*"Environmental Assessment Report UTS City Campus, Broadway Precinct Concept Plan" dated May 2009, and as amended by the Preferred Project Report "Preferred Project Report UTS City Campus Concept Plan" dated October 2009 **and as modified by "Environmental Assessment Report UTS City Campus, Broadway Precinct Modification to Concept Plan" dated July 2015 and as amended by the "Response to Submissions" dated November 2015** prepared by JBA Urban Planning.*

Except for otherwise provided by the Department's modifications of approval as set out in Schedule 2, Part B and the Proponent's Statement of Commitments set out in Schedule 5.

(b) In the event of any inconsistencies between the modifications of this concept approval and the plans and documentation described in Part A, Schedule 2, the modifications of this concept approval prevail.

(c) In accordance with Section 75P(2)(a) of the EP and A Act, where there is an approved Concept Plan, any approval given under Part 4 of the Act by Council, must be consistent with that Concept Plan.

3.3 Proposed modifications to the Statement of Commitments

Modifications are required to the approved Statement of Commitments. Words proposed to be deleted are shown in ~~***bold italics strike through***~~ and words to be inserted are shown in ***bold italics***.

Design Excellence

The proponent will adopt the design excellence process at Section 3.9 of the EAR and incorporate the design quality controls at Section 3.10 of the EAR and Section 3.1.3 of the PPR for new development on the site.

The appointed architects for the Building 1 Podium Extension and Building 2 are Lacoste + Stevenson and fjmt. The design of Building 2 is to incorporate the design quality controls at Section 3.5 **of the Response to Submissions for the Section 75W Modification Application (Mod 5).**

Ecologically Sustainable Development

UTS will adopt the following sustainability targets for the site:

- 6 star Green Star Education target for the new Thomas Street Building;
- 5 star Green Star Education target for the new Broadway Building, ***extended Building 1 podium and new Building 2***;
- 4 star Green Star Education target for major refurbished buildings ~~***and podium extensions to Buildings 1 and 2***~~;
- Reduction in overall water campus consumption by up to 20 percent by 2010 (based on 2002 levels); and
- Meet or exceed the requirements of Section J of the Building Code of Australia for energy efficiency in building fabric and environmental systems.

To meet these targets, UTS will:

- Ensure the new Building 6 Tower for student accommodation meets the energy and potable water targets for residential flat buildings;
- Work with the proponents of the nearby Frasers Broadway development to investigate opportunities to incorporate complementary sustainability projects on both sites;
- Adopt water sensitive urban design principles, such as stormwater reuse and rainwater capture across the campus; and
- Adopt practices to minimise construction and operational waste including reuse 80% of demolition waste and investigate strategies.

In addition, UTS will investigate the following ESD initiatives as part of the Concept Plan:

- Integrating a 1.2-1.5 megawatt trigeneration plant into the UTS City Campus utilities system;
- Installing of a bio-digester plant in Building 2 to reduce operational waste; and
- Installing blackwater recycling system with sewer mining capacity (to enable black water to be used for chiller and toilet flushing purposes).

A clean copy of the proposed revised final Statement of Commitments is included in **Appendix D**.

3.4 Proposed Modifications to Urban Design Principles

Modifications are required to the approved Urban Design Principles. Words proposed to be deleted are shown in ~~***bold italics strike through***~~ and words to be inserted are shown in ***bold italics***.

High quality design

Achieve ***design excellence*** ~~***in architectural design through a design competition process***~~. UTS is committed to achieving ***design excellence*** ~~***an excellent standard of architectural design***~~ on the ***campus*** ~~***site***~~ through a design competition process ***or direct appointment of a renowned architect with a record of achieving design excellence.*** ~~***described in detail at Section 3.9.***~~

Multiple development opportunities

Transform multiple, disparate development sites into new education facilities that meet UTS's long-term needs. Development should be staged as the University's needs for additional student accommodation and educational, cultural and recreation services are refined over time.

Improved permeability

Capitalise on the site's urban character and maintain the informal transition between the campus and the remainder of the city by creating multiple entrances to the site, rather than a single front door. Each new building should be orientated to facilitate active uses on internal and external streets and provide new, or improve existing connections through and beyond the site.

The centre of the campus

Establish the centre of the campus as its academic, social and ceremonial heart. It encompasses the learning commons, which accommodates an expanded library, Great Hall, student services and social facilities. Services for staff and students are to be integrated with the centre of the campus to provide linkages and reinforce UTS's core.

New identity and entrances

Transform the ~~***current***~~ Broadway frontage of the site into a new "front door" to the campus. ***The creation of this new identity will be achieved through a new building constructed along Broadway between Jones and Wattle Streets together with the extension and integration of Building 1 and Building 2 podiums and additional floors above the redeveloped Building 2 podium – completing a relationship in form with One Central Park.*** The extension of Buildings 1 and 2 will create a new multi storey entrance to the campus. Active uses at and below ground level will invite the community into the campus. ~~***A new building will be constructed along Broadway between Jones and Wattle Streets to create a new identity for UTS on Broadway: of the University's 320 metre street frontage to Broadway, 230 metres will be new or refurbished.***~~

Integration and connection

Improve the legibility of the campus by locating and emphasising major gateways and creating new internal and external streets. Multiple north-south and eastwest pedestrian "streets" will facilitate safe and attractive circulation across the campus and to the remainder of the city. Improved functional relationships will result from relocation of faculties into new and refurbished buildings.

Cultural and recreational hubs

Locate new cultural and recreational hubs across the campus. They include purpose-designed facilities such as ~~***a an cinema,***~~ art gallery, multi-purpose sports hall, cafes and retail outlets.

Improved open spaces

Create new, useable open spaces that will receive solar access throughout the year. Alumni Green will provide a prominent landscaped entrance to the campus from Jones Street, while new entrances through Building 6 will facilitate an accessible path from ~~***the UPN***~~ ***The Goods Line*** into the campus. ***Opportunities for useable open green roof spaces are to be explored.***

Sustainability

Achieve a high level of environmental performance for new and existing buildings on the site. All new construction on the campus will target a 5 star rating using the Education Tool prepared by the Green Building Council of Australia. Existing buildings that are to be refurbished will target a rating of 4 stars using the Education Tool.

Access

Capitalise on the site's excellent connections to public transport and pedestrian links to locality and beyond. New accessible pedestrian connections will be created across the campus to improve permeability, the existing quantum of on-site car parking will be maintained, and deliveries will be rationalised through dedicated entrances off Thomas Street.

A clean copy of the proposed revised final Urban Design Principles is included in **Appendix E**.

3.5 Proposed Modifications to Design Quality Controls

Modifications are also required to the approved Design Quality Controls. Words proposed to be deleted are shown in ~~***bold italics strike through***~~ and words to be inserted are shown in ***bold italics***.

Building 2

- Limit the height of the ***podium*** building to 30 metres from ground level (including plant) at Broadway.
- ***Limit the height of the additional floors above the redeveloped podium to 64.5 metres from ground level (including plant) at Broadway.***
- ~~***Refurbish external facades.***~~
- ~~***Refurbish and extend the existing atrium to provide daylight into the building.***~~
- ~~**Maximise the extent of**~~ ***Provide*** permeability of the ground plane along Jones Street and Alumni Green ~~***through retail and student union shopfronts and student and public facilities.***~~
- ***Provide activation and pedestrian movement between Building 1 and Building 2, supporting a truly integrated campus.***
- Provide ***prominent and clear*** pedestrian entries off Jones Street and Alumni Green.
- Provide pedestrian protection along the length of the Broadway frontage.
- ~~***Provide a pedestrian colonnade or awning along the northern edge of the building to Alumni Green***~~. ***Provide a weather proof pedestrian connection near the northern edge of the building with connections to Jones Street and Alumni Green.***
- Consider an element of transparency in the building design to express functions within.
- Incorporate design solutions to address wind conditions in the locality.

- ***Minimise overshadowing impacts on the public domain and adjacent residential development.***
- ***Maximise opportunities for view sharing where feasible within the limits of the site's Global Sydney CBD location.***
- ***Explore opportunities to provide visual extensions to Alumni Green through the provision of green spaces on upper level terraces and roof spaces.***
- ***Respect the existing Building 1 tower.***
- ***Provide additional floors above the redeveloped Building 2 podium that are setback from the Broadway Street wall, integral with the podium and positively contribute to its surrounds.***
- ***Establish an appropriate relationship and setback to Building 1 tower to support its appreciation and setting from wider viewpoints. Minimum setbacks of approximately 10.5m – 13m at Level 9 and approximately 14m – 19m at Level 17 to be provided to Building 1 tower.***
- ***Respond to the scale of existing buildings along Jones Street through progressively stepping the building form away from the street wall.***
- ***Respond to the importance of the Balfour Street view corridor (within the context of addressing environmental factors, such as wind conditions) through:***
  - ***preserving the openness of the corner of Broadway and Jones Street;***
  - ***materiality; and***
  - ***progressively stepping the building away from Jones Street above the podium.***

A clean copy of the proposed revised final Design Quality Controls is included in **Appendix F**.

4.0 Additional Information and Assessment

4.1 Amended Modification Plans

In response to a request from the Department of Planning, amendments have been made to the proposed Concept Plan Drawings. The plans now make it clear that the proposed Building 2 envelope will facilitate the redevelopment of the site and construction of a new building (new podium and tower building). The amended plans prepared by fjmt are included at **Appendix G**.

4.2 Visual and View Analysis

To assist in illustrating and understanding the improvements to private views associated with the current indicative design, Architectus has prepared a series of comparison views (refer to **Appendix H**) from select apartments within Central Park.

Figure 10 below provides an example of this view comparison exercise. As evident, there is clearly skilful design being employed to improve and open up district and city views between the redeveloped Building 2 and Building 1 tower.

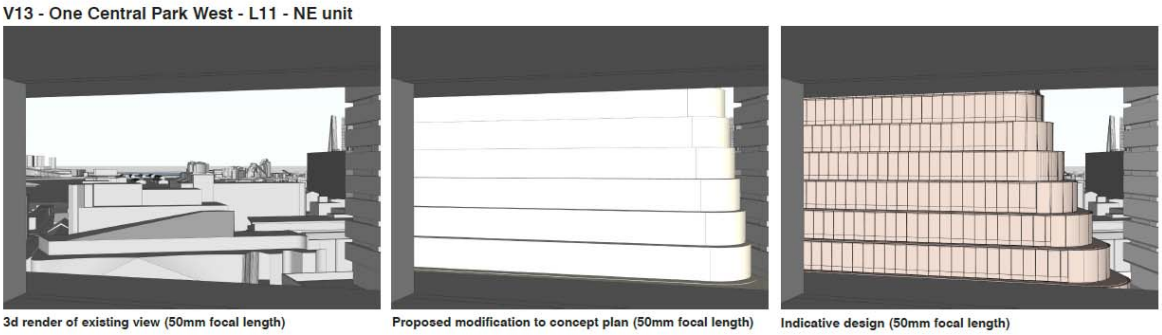

Figure 10 – View comparison analysis

Source: Architectus

5.0 Conclusion

The proponent and project team have considered all submissions made in relation to the public exhibition of the proposal. A considered and detailed response to all submissions has been provided within this report and the accompanying documentation.

In responding to and addressing the range of matters raised, the proposed modifications to the Concept Plan have been refined to provide greater certainty and reflect the status of design development for this final stage of the Concept Plan.

The refined modifications do not substantially differ from those originally publicly exhibited. In addition, and to the benefit of the overall project, the environmental impacts of the amended modifications remain consistent (or are an improvement) with those originally assessed.

The proposal has significant planning merits as it will:

- Facilitate the addition of a new iconic (exemplar design excellence) building for the UTS City Campus Broadway Precinct and Sydney CBD more broadly, contributing to its global status;
- Assist in meeting the increased demand for tertiary education;
- Support the creation of additional jobs;
- Support a more skilled workforce;
- Strengthen a key industry of Sydney and NSW that plays a crucial role in making NSW Number One;
- Provide opportunities to improve the extent of open space in the Broadway Precinct; and
- Strengthen the western gateway to the Sydney CBD.

Due to the significant merit of the proposed modifications and the lack of any adverse environmental, social and economic impacts, the modifications are appropriate and supportable.