

20 December 2019

218062

Anthony Wetherdin
Director, Key Sites Assessment
Department of Planning, Industry and Environment
Level 22, 380 Pitt Street
SYDNEY NSW 2000

Attention: Lewis Demertzi,

Dear Mr Demertzi,

RE: RESPONSE TO SUBMISSIONS

**Block 4B Central Park Adaptive Reuse (SSD-9374) + S75W CENTRAL PARK CONCEPT PLAN
MODIFICATION 16 (MP06_0171)**

This letter has been prepared by Ethos Urban on behalf of the proponent, IP Generation, in relation to the adaptive reuse of Block 4B within Central Park (SSD-9374) and Section 75W Modification Application (MOD 16) to Project Approval MP06_0171, relating to the adaptive reuse of Block 4B.

The application was publicly exhibited between 10 and 31 October 2019. This letter provides a supplementary response to submissions (RTS) addressing issues raised by the relevant agencies, in response to the Key Issues letter issued by Department of Planning, Industry and Environment (DPIE) dated 29 November 2019. This letter responds to the comments presented within the following received submissions:

- The Department of Planning, Industry and Environment (DPIE) dated 29 November 2019;
- City of Sydney Council (CoS) dated 15 November 2019;
- Environmental, Energy and Science (EES) (formerly known as Office of Environment and Heritage) dated 28 October 2019;
- Heritage Council NSW dated 18 November 2019;
- Roads and Maritime Services (RMS) dated 30 October 2019;
- Transport for NSW (TfNSW) dated 29 October 2019; and
- Environment Protection Authority dated 29 October 2019.

In addition to the above agencies, one public submission was received.

Table 1 summarises the key issues raised in the submissions and the applicant's response. It should be read in conjunction with the following documents:

- Attachment A** – Letter dated 11 September 2019 from Ethos Urban to Government Architect requesting to meet regarding the proposed development.
- Attachment B** – Additional Heritage Response prepared by Urbis dated 19 December 2019.
- Attachment C** – Revised Architectural plans prepared by Tzannes and Associates dated 20 December 2019.
- Attachment D** – Revised Public Domain Plans prepared by Turf Design dated 17 December 2019.
- Attachment E** – Operational Waste Management Plan prepared by Waste Audit dated December 2019.
- Attachment F** – Traffic and Transport Statement prepared by GTA dated 19 December 2019.
- Attachment G** - Response to City of Sydney Submission, prepared by Tzannes and Associates dated 20 December 2019

1.0 Response to Submissions

As outlined above, 6 agency and 1 public submission was received during the exhibition period for the above project, including a request for a RTS issued by the DPIE, in which this letter addresses. A summary of the responses to submissions are provided in **Table 1** below. In preparing this response, the applicant and its consultants met with officers from the City of Sydney Council to discuss the application further on Thursday 5 December 2019.

Table 1 Response to Submissions

Submissions	Response
Department of Planning, Industry, and Environment	
<p>Design Excellence</p> <ul style="list-style-type: none"> The Statement of Commitments for the Central Park Concept Plan (MP06_0171) provide that a Design Integrity Panel (DIP) will oversee the development of Block 4B (the Brewery Yard). <p>The Department therefore requires the proposal to be reviewed by the DIP. The DIP should consider the issues raised by Heritage NSW and Council in relation to:</p> <ul style="list-style-type: none"> The extent of intervention to the building fabric and protection of heritage value of the building and site The design integrity of the northern façade and the northern part of the façade. <p>Please provide evidence that the proposal has been presented to the DIP, including a report summarising any recommendations of the DIP and how they have been addressed.</p>	<p>Statement of Commitment 1 requires a Design Integrity Panel to be appointed by DPIE to oversee the design of the buildings on Blocks 1, 4 5, 9 and the Kensington Precinct. All of the blocks except for the Brewery Yard have now been developed.</p> <p>It is noted that the Design Integrity Panel (DIP) has not been constituted for some time and many of recent development approvals have been granted notwithstanding the fact that the designs had not been reviewed by a DIP. These include:</p> <ul style="list-style-type: none"> MP10_0217 – Brewery Buildings MP11-0089 – Block 3A MP11_0090 – Blocks 3B, 3C & 10 MP11_0091 – Blocks 6&7 SSD2012-5700 – Block 4S <p>It is noted that as part of the assessment of the former application relating to the adaptive reuse of the Brewery Buildings (MP10-0217), the Department took the position that the design of the buildings is primarily dictated by the heritage significance of the buildings and as such did not require the review of the proposal by the DIP.</p> <p>As the same architect, Tzannes and Associates, whom had been retained for the revised proposal, followed the same principles that were established in the Concept Plan and previous application in terms of design philosophy, it is considered that the revised proposal continues to exhibit design excellence.</p>
<p>Please provide details of consultation with the Government Architect NSW.</p>	<p>A letter dated 11 September 2019 (see Attachment A) was sent to the Government Architect providing a summary of the proposed development and offering an opportunity to meet to discuss the proposal or provide feedback by other means. No response was received from the Government Architect.</p>
<p>Heritage</p> <ul style="list-style-type: none"> Please provide further justification for the extent of modifications to the Brewery Yard building and removal of significant building fabric, having regard to the issues raised by Council and Heritage NSW. You should also consider mitigation measures to minimise the impact on the heritage significance of the building and site. 	<p>A response to this issue has been prepared by Urbis and is provided at Attachment B.</p>
<p>Public Domain</p> <ul style="list-style-type: none"> Consider options for alternative loading and servicing arrangements within the site, noting Council's concerns about the impacts on the public footpath. 	<p>Several options have been previously considered as to how best to service the site, given that there is no loading space contained within the basement of blocks 1 & 4 for the Brewery Buildings.</p>

Submissions	Response
	<p>One of the alternative options considered was the potential to create a service space within the Brewery Yard itself which would be accessible at certain times of the day, however this option was not pursued given the feedback received from Council and the Department that this was not a supportable option.</p> <p>Whilst the applicant considers that the option proposed with the original application is the best outcome, it is now pursuing an alternative option of converting some of the parking spaces already existing on the opposite side of Central Park Avenue. In this respect the applicant has made contact with Council to determine how to achieve this outcome and we are awaiting formal feedback. We will provide a further response on this issue when we receive a formal response from Council.</p>
<ul style="list-style-type: none"> Address access within the site, including consideration of refinements to improve physical and visual connections through the building to the courtyard. 	<p>In order to improve visibility into the Brewery Yard forecourt space, the proposed building entrance foyer has been deleted from the scheme. This outcome now allows better visual connectivity from the park through to the Brewery Yard via the through-site link. Refer to the revised architectural plans at Attachment C.</p>
<ul style="list-style-type: none"> Provide consideration of public art and how it will integrate with the landscaping and potential use of the courtyard. 	<p>The public art to be installed within the Brewery Yard has already been commissioned by Frasers in accordance with the broader public art strategy for the site. The artwork is currently being shipped to Australia and will be stored by the applicant until such time as it is ready to be installed.</p> <p>The proposed location of the artwork is depicted on the public domain plans (Attachment D). This location was chosen as it would not enclose the Brewery Yard forecourt space and is not located within one of the various easements which apply across the Brewery Yard forecourt.</p> <p>Following the meeting with Council officers dated 5 December 2019, we understand that they are supportive of the revised proposed location for the artwork.</p>
City of Sydney Council	
1. Heritage Impacts	
<p>1.1 Rooftop Addition</p> <p>The proposed roof addition provides for an additional 2 floors. The addition is distinct from the original masonry form of the building, it comprises glazing and metal materiality to distinguish. Its construction requires the removal of the existing gabled truss roof and one of the two towers. The additional floors will be apparent in views from the north towards the northern elevation of Building 22/23. Its form is supported but the impact on heritage fabric is high. The form does not draw an objection from the City but notes the impact on the heritage significance of the site is high.</p>	<p>Noted, no response required. Refer to COS01 contained in Attachment G, prepared by Tzannes.</p>
<p>1.2 New external stair tower</p> <p>The submitted heritage impact statement does not take into consideration this stair new tower. The statement should be revised taking into account the updated proposal.</p> <p>Penetrations to the existing building seem to coincide with the existing windows. The bulk and visual impact could be reduced, however, if the proposed structure will host the staircase only and reduces the length of the “corridor space” between the staircase and the building. The City notes the visual impact is high but acceptable</p>	<p>Following consultation with Council officers dated 5 December 2019, the positioning of the external stair has been positioned in its current location for a number of important reasons and is supported by Urbis Heritage.</p> <p>Refer to COS02 for further information contained in Attachment G, prepared by Tzannes.</p>

Submissions	Response
<p>1.2 Removal of one coal hopper in building 30 This hopper is documented to be of exceptional heritage significance and one of the few surviving elements of the brewery. Its position is important allowing its appreciation from street views, through the proposed glazed façade. Its demolition is not supported and careful considerations should be made to avoid building visual interruption between the hopper and street views. The City notes the impact on the heritage significance of the site is high and detrimental.</p>	<p>The revised proposal removes the central coal hopper within Building 30 but is considered to enhance the heritage interpretation, views and provides new closer access and interaction with the remaining two coal hoppers.</p> <p>Refer to COS03/4 for further information contained in Attachment G, prepared by Tzannes.</p>
<p>1.4 Reorganisation of floor levels internally for additional mezzanine floors The proposed additional floors and mezzanine to building 30 does not have a setback from the glazed large façade. These additional 3 floors stop the visibility of the heritage hoppers from street levels. The large glass façade is an important part of the project that allows the appreciation of the exceptional heritage hoppers from street views.</p> <p>Further, this area within building 30 is the only remaining space within the whole Central Park redevelopment site that could be retained as an open large space for spatial appreciation of the industrial scale of the historic use. This space, enriched by the 3 hoppers, could become the most significant aspect of the project. No additional floors or any opaque surface that interrupt or diminish this visibility of the hoppers are supported. The City notes the impact of these works on significant heritage fabric is high and is detrimental to the significance of the site.</p>	<p>Design alternatives were discussed during the meeting with Council officers dated 5 December 2019 to workshop the internal floor levels so that greater interpretation and visual connection of the hoppers could be achieved. Following this, a revised design has been proposed to increase the visibility of the hoppers from street levels through reorganising the composition of the internal floor levels.</p> <p>Refer to COS03/4 for further information contained in Attachment G, as well as the revised architectural plans at Attachment C, prepared by Tzannes.</p>
<p>1.5 Removal of silos in building 23 Building 23 is the only building to have an original internal structure and was the only building to retain its original function as part of the malt silos/ plant. It is of exceptional significance. Previous proposals to the building included the demolition of 6 of the 8 concrete silos, with the 2 easternmost silos being retained, along with the retention of the pyramidal funnel forms at the base of all 8 silos on the ground floor and the plant equipment on the two easternmost silos. This was supported by City is that the complete structure was retained and the function of the structures were interpreted.</p> <p>The current proposal seeks to further reduce the extent of the silos, retaining the two concrete silos on the first floor only and removing the silos on the upper floors. The impact on the heritage significance is high and detrimental and is not supported. It is recommended that the original extent of the retention of the silos is maintained</p>	<p>During the meeting with Council officers dated 5 December 2019, it became apparent that retaining the silos whilst ensuring a commercially viable floorplate is challenging. The architectural plans have been revised to propose the retention of some elements of the silos (where possible) and reconstruct the remaining elements (where this is viable). Where the concrete silos engage with the existing brickwork of the external walls (and without clashing with windows) it is proposed they are retained.</p> <p>Refer to COS05 for further information contained in Attachment G, prepared by Tzannes.</p>
<p>1.6 Modifications to external windows and doors The City requests that the replacement of steel framing should be conditioned to be “like for like” in the same material. The proposed aluminium framing is not supported and should be avoided.</p>	<p>An initial review of the existing conditions of all windows was conducted during the early stages of the project. This review found that less than 5% of the windows were able to be refurbished due to the hazardous mastic in the windows.</p> <p>As discussed with Council officers dated 5 December 2019, a new revised audit of the existing windows will be completed confirming the action to make good or conserve particular windows depending on their existing condition.</p> <p>Refer to COS06 for further information contained in Attachment G.</p>

2. Impacts on Northern Façade

Submissions	Response
<p>The City is concerned that the proposed works will impact the existing design integrity of the northern façade and the northern part of the eastern façade.</p> <p>The original approved design of the completed cooling towers included a deep, angular 'bird's mouth' recess between the underside of the cooling towers and the top of the glass facade. This was intended to make an emphatic articulation between the old building and the new cooling tower on top and was a key heritage and design justification for the approval of the large and contemporary form of the cooling tower. The pitch angle of the lower surface of the recess was to match that of the original roof that was demolished to make way for the towers and also matches the angle of the surviving east brick and stone parapet. The existing steelwork on site is in place for this but the cladding and glass facade were not constructed.</p> <p>This strong and desirable approved articulation has been diluted in the current proposal, most likely to provide additional clearance for the proposed, intrusive additional floors in this area. This is an unacceptable change to the original design intent and is not supported. The design should be amended to retain and complete the 'bird's mouth' articulation as originally approved.</p> <p>I also note that the existing steel work spans the full width of the void under the existing cooling towers. The additional columns proposed to support the new, intrusive floors also dilute the clarity of the originally approved design for this area. The design quality of the first stage of this multi-award winning adaptive design project is less in the current proposal and its heritage impacts are far worse with substantial loss of significant internal and external fabric.</p>	<p>The principles and award winning components of the northern façade have been maintained, as Tzannes have continued their position on the Brewery Yard as the award winning architects responsible for the original design. The monumental ground floor opening of the northern facade has been retained and enhanced through post SSDA design development presented in this proposal.</p> <p>Refer to COS07 for further information, justification, graphics and 3D digital images contained in Attachment G.</p>

3. Ecologically Sustainable Development

<p>The City expects the office component to be designed to achieve at least NABERS Energy 5.5 Stars and for the proponent to demonstrate this by entering into a formal commitment agreement with the NSW Government</p>	<p>Noted, this is proposed.</p>
<p>The City also seeks confirmation that this component of the precinct redevelopment will connect to both the trigeneration energy system and the precinct scale water recycling system. The City also recommends that innovation in energy efficiency for services / fit out of any retail components be implemented.</p> <p>Clarification is also requested as to whether the development will take up any on-site renewable energy opportunities – namely photovoltaic systems / solar thermal and/or heat-pump technology all of which would align with the precinct's espoused focus on ESD / environmental best practice.</p>	<p>The applicant notes this and would accept a condition of consent requiring the preparation of this additional information prior to the issue of an Occupation Certificate.</p>

4. Transport and Access

Submissions	Response
<p>4.1 Parking bay and loading and servicing The proposal includes the provision of a loading bay placed over the public footway and is not supported.</p> <p>The current property boundary alignment does not allow for an indented bay in this location. It would prevent provision of a continuous footway along publicly owned land, irrespective of whether a path of travel can be provided on private land. Utilising public land in this way, when parking is available on the other side of the road does not represent good use of public assets.</p> <p>Being private land, the City cannot control accessibility or complete blockage of the pedestrian path. At minimum the land would be subdivided and dedicated to the City. However, this is not favoured as a pathway on public land already exists.</p> <p>Further, the Sydney DCP 2012 suggests 5 loading and service vehicle spaces are required for a development of this size. Given that the proposed loading bay is not supported in its current form, additional information is required to ascertain how the loading and servicing for the proposed development will be achieved</p> <p>4.2 Bicycle Parking and end of trip facilities The submitted traffic report has proposed 65 bicycle spaces. This would be acceptable however, no bicycle parking plans have been submitted for review. Council's transport planners recommends that the minimum number of bicycle parking spaces and end of trip facilities to be provided for the development comply with the following table</p>	<p>The heritage constraints of the Brewery Yard restrict the ability to provide a basement level loading facility. The original concept included an on-site, at-grade private road/ porte cochere facility with area for loading/ unloading. However, this was ultimately removed to improve the public domain in terms of public accessibility and safety within the forecourt area. In its place, an on-street indented parking zone has been proposed noting there are no dedicated on-street loading zones near the site or in an accessible location to the Brewery Yard to facilitate short-term deliveries.</p> <p>The existing indented parking zones on the west side of Central Park Avenue have a current 15-minute time restriction along the bend and two-hour/four-hour time restrictions for three car spaces south of the bend. The 15-minute parking zone is intended for set-down/ pick-up activities and has also been observed to be used for loading/ unloading activities.</p> <p>Further discussions with City of Sydney regarding the use of these existing zones for short term loading / unloading associated with the Brewery Yard are currently occurring. A future application regarding additional parking provisions to allow these bays to be utilised for loading / unloading at particular times allowances are being explored with Council.</p> <p>Bicycle parking and End of Trip Facilities will be incorporated into the development. Refer to the documents within the package submitted with this RFI.</p>
<p>4.3 Green Travel Plan and Transport Access Guide The Green Travel plan submitted does not meet council's requirements in its current form. It must be updated to include clear and time bound targets, actions, measurements and monitoring framework. As a live document it should be periodically updated. The revised GTP must be developed in consultation with the relevant stakeholders including the Council.</p> <p>A Transport Access Guide (TAG) has not been submitted as part of this application. It is recommended that a TAG be implemented and maintained by the operator/s of the premises to inform patrons about accessing the site by sustainable transport options including walking and cycling, public transport, taxis or a combination of these modes</p>	<p>The applicant is committed to preparing these documents and would accept a condition of consent requiring preparation of such documents prior to the issue of an Occupation Certificate.</p>
<p>5. Access within the site</p>	
<p>The combination of the new foyer and the location of the through site link results in a pedestrian connection that lacks a clear view into or from the central square. A direct visual connection from one space to another is critical in the success and safety of this pedestrian route. It is recommended one of the following amendments be made to the layout to resolve this issue:</p> <ul style="list-style-type: none"> - Remove the new foyer addition to 'un-block' the view. - Reconfigure the foyer to remove the southern protrusion and enable a direct but oblique view of the through site link from the square. - Reposition the through site link to the adjacent carriageway bay (to the west), enabling both the 	<p>The proposal has been amended to delete the previously proposed foyer from the scheme. This allows for better visual connections from the park and through-site link into the Brewery Yard forecourt.</p> <p>Refer to the amended architectural plans at Attachment C.</p>

Submissions	Response
<p>retention of the foyer and a clear view through the pedestrian connection</p>	
<p>In addition, it is recommended that a detailed plan be submitted showing how an AS 1428.1 compliant landing will marry with existing footpath levels to the southern end of the through site link where the landing will protrude beyond the building line.</p>	<p>The through site link ramp landing and its associated TGSI is not expected to protrude beyond the building line. The design level at the bottom landing is 13.23 which will then have a 1:40 gradient toward the building line reaching 13.21. Based on the current survey, a revised design for new paving to fall at a 1:50 gradient toward the existing paving along the hoarding has been proposed. Please refer to attached drawing JAT-LS-BY-G00-300(P1) at Attachment D for clarity.</p> <p>The finished ground levels are shown on the public domain plans at Attachment D.</p>
<p>6. Public Art</p>	
<p>The application has not been accompanied by a public art strategy or public art details and it is difficult to provide comments regarding the installation of public artworks within the development.</p> <p>A note on the landscape drawing states: <i>'public art to be installed in courtyard. Artwork by others. Final location to be determined in consultation with City of Sydney, client and artist.'</i> Given there is no indication at all of the size, extent, or scope of this public art piece, this could have a significant impact on the success of the space. It is strongly recommended that details of the artwork be provided, confirming that it has been designed in consultation with the landscape architects and has no adverse impact on the potential function of the square.</p>	<p>The public art has been procured by Frasers in accordance with the Public Art Strategy (as amended) following consultation with the Department and City of Sydney. We understand that the artist, Ugo Rondinone and art titled <i>'The Remembered'</i> was agreed to by the City of Sydney, endorsed by Barbara Flynn.</p> <p>Following a meeting with Council officers dated 5 December 2019, we understand that Council are supportive of the revised proposed location of the artwork.</p>
<p>7. Tree Planters</p>	
<p>The two large tree planter boxes are located above a basement however, the level of the SSL and subsequent depth/volume of the planters is unclear. It is requested that detailed sections through both planters clarifying soil depth, detailed build up and drainage to confirm the planters will provide sufficient soil volume for the intended planting be provided for review.</p>	<p>Please refer to attached drawing JAT-LS-BY-G00-602(P1) at Attachment D for planter and planting details which show the range of soil depth expected between the two planters. The soil volume will vary slightly due to the slope to the existing structure. The minimum soil volume within each planter is 10m³.</p>
<p>8. Waste Management</p>	
<p>An insufficiently detailed waste management plan has been provided as part of the application documents. The waste management plan must clearly address the following:</p> <ol style="list-style-type: none"> Waste generation calculations to support proposed number and configuration of bins, detailed by proposed type of use and total space allocated using the Guidelines for Waste Management in New Developments 2018. Plans and drawings of the proposed development that show location and space allocated to the waste and recycling storage area(s). Nomination of the waste collection point(s) for the site and identification of the path of access to be used by collection vehicles. As per the provisions of the Sydney DCP 2012 waste collection should preferably be accommodated wholly within the new 	<p>An updated operational Waste Management Plan is provided at Attachment E. A construction and demolition waste management plan will be prepared by the contractor once appointed.</p>

Submissions	Response
<p>development and within the buildings' basement. Alternatives must be discussed if this option is not possible.</p> <p>d) Details of the ongoing management of the storage and collection of waste, including responsibility for cleaning, transfer of bins between storage areas and collection points, maintenance of signage and security of storage areas.</p> <p>e) A demolition and construction waste and recycling management plan is required to be submitted, the template can be found in Appendix section of the Guidelines</p>	
<p>9. Public Domain and Building Lighting</p>	
<p>A public lighting strategy should be considered either during the assessment or as a condition of consent</p>	<p>The proposed public domain lighting will provide night-time amenity for visitors and patrons. The lighting design shall be further developed during Detail Design phase in consultation with Turf Design Studio (Landscape Architect) and Wood & Grieve Engineers (lighting consultant) to meet the minimum safety standards, including CPTED principles.</p> <p>The lighting character of the main public forecourt will correspond with the Central Park precinct public lighting. The design will include the iGuzzni Multiwoody post-top lights, strategically located to illuminate the forecourt. These fixtures can also be found on the main pedestrian thoroughfare, east of the Brewery Building and along Kensington Street. Other light fixtures will be carefully integrated into landscape and building elements to enhance user amenity and accentuate external elements. External lighting elements includes:</p> <ul style="list-style-type: none"> • Multiwoody post-top light poles • Handrail spot downlights • Feature tree uplights • Through site link surface mounted downlights <p>Further lighting details are provided in the public domain plans at Attachment D.</p>
<p>Environmental, Energy and Science</p>	
<p>Biodiversity A Biodiversity Assessment Report (BDAR) waiver was approved on 13 November 2018.</p>	<p>Noted.</p>
<p>Flooding The Brewery Yard Hotel Desktop Flood Review 18 July 2019 prepared by Mott MacDonald has been reviewed and EES considers that there are no outstanding flood risk management issues remaining for the proposed site.</p>	<p>Noted.</p>
<p>Aboriginal Cultural Heritage In its previous submission on the SEARs (dated 20 June 2018), the former Office of Environment and Heritage recommended that Key Issue (5) be amended to incorporate Aboriginal cultural heritage requirements including an Aboriginal Cultural Heritage Assessment Report (ACHAR) and consultation with Aboriginal people to be undertaken for the proposal.</p>	<p>Noted. This has not been required for any of the previous applications approved by the Department and is not a requirement of the Concept Plan Approval.</p>

Submissions	Response
<p>Aboriginal Cultural Heritage requirements were not included in the SEARS that were issues and therefore an ACHAR has not been undertaken by the applicant.</p>	
<p>Transport for NSW</p>	
<p>Freight and Servicing It is requested that the applicant provides the following, as part of the applicant's response to submissions:</p> <ul style="list-style-type: none"> • Details of the development's freight and servicing profile, including the forecast freight and servicing traffic volumes by vehicle size, frequency, time of day and duration of stay, with reference to traffic surveys included in the GTA's database of loading demand; • Investigation into the use of shared loading dock facilities within Central Park, rather than reliance on on-street loading zones. • If the above is not achievable, confirm details of the time restriction for the proposed 12m long service vehicle parking bay in accordance with the City of Sydney parking policy; and • Confirm that the proposed 12m long service vehicle parking bay would be able to accommodate the forecast demand of the development with the proposed time restriction for the parking bay in place. <p>It is also requested that the applicant be conditioned to prepare a Freight and Servicing Management Plan for the review and endorsement of the Coordinator General, Transport Coordination.</p> <p>Construction Pedestrian and Traffic Management It is requested that the applicant be conditioned to prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with the Sydney Coordination Office within TfNSW and submit a copy of the final CPTMP plan to the Coordinator General, Transport Coordination for endorsement, prior to the issue of any construction certificate or any preparatory, demolition or excavation works, whichever is the earlier.</p>	<p>GTA has prepared a response to the TfNSW submission. Refer to Attachment F.</p> <p>The applicant is comfortable in accepting such a condition of consent.</p>
<p>Active Transport It is requested that that future lit out' developments:</p> <ul style="list-style-type: none"> • Provide bicycle parking and end of trip facilities for pedestrian and bicycle riders in accordance with City of Sydney Council development control plans, standards and guideline documents; and • Locate bicycle facilities in secure, convenient, accessible areas close to the main entries incorporating adequate lighting and passive surveillance and in accordance with Austroads guidelines. 	<p>Bicycle Parking and End of Trip facilities are shown on the architectural plans at Attachment C.</p>
<p>Heritage NSW</p>	
<p>The proposal involves a high degree of intervention to the building fabric which may have adverse impact on the heritage values of the site. The extensive reorganisation of the internal structure to provide for additional levels and mezzanines, as well as the proposed additions including a new roof top have the potential to irreversibly alter significant fabric. While the 2019 HIS states that the internal structure is generally modified or later fabric, the building remains an intact remnant of the site's significant brewing history. Further intervention to the site, including the removal of the silos and coal hoppers which inform the early layout and historical use of the site, may</p>	<p>Consultation was undertaken with City of Sydney on 5 December 2019. A response to heritage impacts has been provided by Urbis and is located at Attachment B.</p>

Submissions	Response
<p>continue to erode the heritage values of the precinct. It is recommended that the City of Sydney be consulted in relation to these issues</p> <p>It is recommended that the impact on the Aboriginal cultural heritage values of the site are assessed in consultation with Aboriginal people. This may include the need for surface survey and test excavation. The identification of cultural heritage values and consultation should be guided by the Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (DECCW, 2011) and Aboriginal cultural heritage consultation requirements for proponents 2010 (DECCW).</p>	<p>The project does not seek to undermine the significance of Aboriginal cultural heritage values however the requirement to undertake such an assessment was neglected from the original SEARs for the project. Should an item of Aboriginal heritage or significance be uncovered during construction works, an appropriate action plan and inclusion of Aboriginal heritage consultant on-site will be properly investigated and commissioned. It's important to note that there are only very minimal excavation works involved in the construction of this project.</p>
<p>As the item is not listed on the SHR, no further comment is required from the Heritage Council, nor are any objections raised to the proposed work. The Heritage Council provide in principle support for the revitalisation of the building and believe the proposed works will have an overall positive impact on the site as will allow for its future use. A cautious approach is recommended as the works are extensive and will affect most parts of the former brewery building.</p>	<p>Noted.</p>
<p>Roads and Maritime Services</p>	
<p>Roads and Maritime has reviewed the submitted application and whilst raises no objections to the proposed development, recommends that the Department includes the below requirement in any consent issued:</p> <ul style="list-style-type: none"> • A Construction Pedestrian and Traffic Management Plan (CPTMP) shall be submitted in consultation with the TfNSW, Sydney Coordination Office (SCO), Roads and Maritime, and City of Sydney Council prior to the issue of a Construction Certificate. The CPTMP needs to include, but not be limited to, the following: construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control, taking into consideration the cumulative traffic impacts of other developments in the area. 	<p>Noted, to be addressed by way of condition of consent.</p>
<p>Environment Protection Authority</p>	
<p>The EPA considers that the risks to human health and amenity associated with emissions of air pollutants, including odour, from the Central Thermal Plant on users and occupiers of the Brewery Yard Building (Block 4B) are possible. The impacts are due to the potential that the emission plume may be drawn down the outside of the stack towards ground level and not be suitably diluted. While it has not been quantified, the EPA considers the risk to be on par with the impacts on other buildings in the Central Park precinct such as in Block 1 and 2 at similar heights to the cooling towers and chimney stack.</p> <p>Mitigation measure that may be applied would include minimising or eliminating ventilation openings in the building in the vicinity of the stack and ensuring mechanical ventilation inlets are not located in the vicinity of the stack. The EPA has not reviewed architectural plans or ventilation details to determine if any design modifications are required. However, photo montages indicate that the windows of the building will not be openable.</p> <p>In view of these factors, the EPA has no further interest in the proposal and no further consultation is required.</p>	<p>Noted.</p>

Submissions	Response
Public Submission (Frasers)	
<p>New External Fire Stair - Addition of an external fire stair connection to the northern elevation. This is a significant addition to the building that, if not incredibly well designed, has the potential to be detrimental to the architectural context of Central Park and should possibly be accommodated within the existing built form.</p>	<p>Refer to response to City of Sydney item 1.2 above and further information, plans and graphics contained in Attachment G, prepared by Tzannes.</p> <p>The new external stair has been positioned in its current location for a number of important urban design and heritage reasons being:</p> <ul style="list-style-type: none"> • It integrates the existing built form elements within the existing Brewery Yard public square in the one composition, minimising public domain clutter. • It allows an appropriate distance from the existing northern wall of the Brewery Building 23. This allows better views of the existing fabric as well the detailed resolution of the junction of old and new work to be better appreciated.
<p>There is no mention of providing amenity within the building for the increased area and population. Indicative population on completion is 262 employees. This seems understated, but the proposed number of occupants and use, are subject to subsequent Development Applications. Issues in this regard include:</p> <ol style="list-style-type: none"> a) That the increased population has necessitated changes in the built form i.e. provision of new fire stair protruding from the existing building. b) Bike storage and end of trip facilities for the increased population has yet to be considered or demonstrated that it can be accommodated in the Development Application and is not appropriate that this be deferred to being resolved in a future fit-out development application. 	<p>Bike storage and end of trip facilities, as well as fire access stairs have been incorporated into the design of the building to necessitate the activation and commercial viability of the building, without which it may still remain dormant. These essential services have been included on the amended architectural plans provided at Attachment C, prepared by Tzannes.</p>
<p>New Parking Bay - Proposes 12m indented parking bay for 15min drop off/pick up parking should be amended as a loading zone only. This area is also proposed to be the location of the rubbish bins twice a week for collection. This indent should be a loading zone only and provision needs to be provided so that bins do not disturb the public footpath.</p>	<p>Refer to response to City of Sydney item 4.1 above. The applicant is in discussions with Council's Traffic Committee to prepare an application to utilise existing parking bays as loading zones on the west side of Central Park Avenue, reducing previous impacts on the pedestrian footpath.</p>
<p>Waste Management Report - A location map should be included in the report clearly identifying the access path to show where the waste is to be transported from storage to a collection point (i.e. loading zone). At no time should bins be stored or left within the public domain. It is not appropriate that this key issue be deferred to be further resolved in the future fit-out Development Application.</p> <p>Public Art - required for the incorporation of the agreed public art strategy (as amended) into the conditions of consent (if granted). We have kept the Developer of the Brewery Yard Building informed of the proposed amendment to the Public Art Strategy for the precinct in particular, the artwork of Ugo Rondinone, entitled "The Remembered" to be installed within the Brewery Yard forecourt. Frasers Property has procured the artwork, and has committed to providing it to the Brewery Yard Developer for them to install in accordance with the final Public Art Strategy or in an alternate location within the Brewery Yard Building as agreed between the artist and the City of Sydney Council nominated art curator.</p>	<p>An updated operational Waste Management Plan is provided at Attachment E.</p> <p>Noted. Refer to response to City of Sydney item 6, above. The nominated artwork will be implemented, as part of the Public Art Strategy, in a revised location to maximise the productivity and limit obstruction to the Brewery Yard forecourt.</p> <p>Following a meeting with Council officers dated 5 December 2019, we understand that Council are supportive of the revised proposed location of the artwork. However, the applicant will formally seek to contact Barbara Flynn at City of Sydney prior to the installation of the artwork in it's revised location.</p>

Submissions	Response
<p>Motorcycle Parking - It should be clearly noted that no onsite motorcycle parking, bicycle storage or end of trip facilities are currently proposed within the Brewery Yard site and this should be resolved in the base build Development application and not left to the subsequent fit-out Development Applications. There is no available motorcycle or bicycle parking areas available to service the Brewery Yard occupants elsewhere within Central Park.</p>	<p>Bicycle Parking and End of Trip facilities are shown on the architectural plans at Attachment C.</p>
<p>VPA obligations in relation to the embellishment of the Brewery Yard forecourt and Publicly Accessible Areas as noted under the agreed Public Accessible Area Management Plan should be conditioned in the consent and should not be further reduced given the reduction arising from the new entry lobby.</p>	<p>Noted.</p>

We trust that this information is sufficient for the Department to finalise their assessment for determination. Should you have any additional queries please do not hesitate to contact the undersigned.

Yours sincerely,



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