

23 April 2020

218062

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

Attention: Amy Watson, Team Leader – Key Sites Assessment

Dear Ms Watson,

**RE: RESPONSE TO SUBMISSION REQUIREMENTS – DESIGN INTEGRITY PANEL  
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. During the exhibition period, a number of submissions were received by the relevant agencies. Of particular importance, City of Sydney Council submitted an objection to the modification and requested additional information and design amendments to the proposal be submitted. In response to this, the consultant team met with the City of Sydney Council on 5 December 2019 to discuss each issue presented in Council's objection letter in great detail, which resulted in some design changes to the overall development proposed as part of the modification.

A formal Response to Submissions letter was submitted to the Department of Planning, Infrastructure and Environment (DPIE) on 20 December 2019 which addressed the changes in response to Council's issues, and also responded to general comments presented by the other relevant agencies. However, DPIE, in new correspondence dated 16 January 2020, required that the modification be presented to the Design Integrity Panel (DIP) as per Commitment 3 of the approved Concept Plan, before accepting the RtS lodged in December 2019.

As the DPIE is aware, the DIP has not been constituted for many years and the original panel members were no longer available to undertake a peer review of the subject application to satisfy this commitment. In response, the applicant proposed to constitute a new panel to undertake a peer review. The following new panel members were nominated:

- Graham Brooks – Director at GBA Heritage;
- Brian Zulaikha - Director at Tonkin Zulaikha Greer Architects; and
- Luke Johnson – Principal at Architectus.

A presentation to the new panel members was held via Zoom video conferencing meeting on 20 March 2020 in which Alec Tzannes presented the revised scheme with representatives from the consultant team who were in virtual attendance, as well as Amy Watson and Lewis Demertzi from DPIE whom both sat in virtually to observe the presentation.

This letter has been prepared to provide a response to the recommendations made by the new DIP members in their report dated 9 April 2020 (appended to this letter) and to satisfy the requirement of Commitment 3 of the approved Concept Plan. Additionally, **Attachment C** appended to this letter addresses the alternative loading zone requirement and responds to the *Parking Bay* requirement outlined in DPIE's correspondence dated 16 January 2020.

**Table 1** summarises the key issues raised in the letter dated 16 January 2020 submissions and the applicant’s response. It should be read in conjunction with the following documents:

- Attachment A** – Design Integrity Report prepared by the DIP members dated 9 April 2020.
- Attachment B** – Revised Architectural plans prepared by Tzannes and Associates dated 16 April 2020.
- Attachment C** - Alternative Loading Zone Proposal prepared by GTA Consultants dated 4 March 2020.

## 1.0 Response to the DIP Recommendations

**Table 1** responds to the recommendations raised by the DIP in their report dated 9 April 2020.

**Table 1 Response to recommendations made by the DIP**

DIP Recommendation	Applicant Response
<p>1. The Panel members recommended that, subject to the resolution of the additional analyses and options outlined in the report, which should be settled in a round of informal discussions with the applicant, the proposal as presented to the Panel achieves design excellence and should therefore be granted the relevant consents to enable it to move forward in an expedited manner.</p>	<p>Noted.</p>
<p>2. The Panel recommended that the floor plate of the proposed Level 3 Mezzanine (DA 1106/D) be pulled back away from the retained Hoppers to match the separation created for Level 3 (DA 1105/D) in order to enable the full scale of the Hoppers to be more widely visible and appreciated from within the adapted space of the Hopper Hall.</p>	<p>Tzannes have provided an alternative design to address this recommendation, included specifically within revised drawings DA1106_RevE and DA3001_RevE at <b>Attachment A</b>.</p>
<p>3. The Panel considered that the internal views, from Levels 2, 3 and 3 Mezzanine, inside the altered Hopper Hall would be a dramatic and spectacular experience for the occupants, while external views into the Hopper Hall would be inevitably degraded should the proposed extra floor plates go ahead. To compensate the loss in external views into the Hopper Hall, the Panel recommends the installation of several large scale dramatic and evocative photos as interpretation panels be installed externally in a location that enables the visitor to see both the photos and through the glazed wall into the Hopper Hall. The project Interpretation Plan is to be amended to suit this requirement.</p>	<p>To respond to this recommendation, an additional interpretation zone is proposed for the installation of large scale dramatic and evocative photos of the existing hoppers. The panels are to be installed externally, on the northern and southern wall of the existing chimney tower at ground level at the northern elevation. The installation will enable visitors to observe the photo installations and view the remaining hoppers through the northern glazed wall. Refer to the documentation submitted at <b>Attachment A</b>.</p>

DIP Recommendation	Applicant Response
<p>4. The amendment proposed by the architects following the Panel Meeting (17007 SK 23/A) to create a hipped eastern end of the proposed new roof over Building 22/23, be adopted and incorporated into the project.</p>	<p>Tzannes have provided an alternative design to address the amended roof recommendation over Building 22/23, included specifically within revised drawings DA1108_RevD, DA1009_RevD, DA2000_RevC, DA2002_RevE, DA2003_RevC, DA3000_RevE, DA3001_RevE and DA3003_RevE at <b>Attachment A</b> appended to this letter.</p>
<p>Other matters raised in the DIP report but not specifically listed in the recommendations</p>	
<p>1. The Panel members called for some form of future interpretation to celebrate the presence and role of the third hopper.</p>	<p>It is proposed to install a mesh form that will mimic the removed hopper. Refer to the architectural package at <b>Attachment A</b>.</p>
<p>2. Detailed architectural drawings showing how the window openings will be enlarged and lined for the new external stair.</p>	<p>This information has been provided in the architectural package at <b>Attachment A</b>.</p>

We understand that DPIE are currently considering projects which are ‘shovel ready’ and can be prioritised as per the recent [Ministerial Media Release](#) on 3 April 2020 to fast track planning processes to keep people in jobs and the construction industry moving throughout the COVID-19 crisis. The applicant and consultant design team is of the view that the Brewery Yard project should be considered for this by the DPIE for the following reasons:

- Some of the early site preparation works for the Brewery Yard have already been undertaken.
- IP Generation (land owner and applicant) is ready to engage a Contractor and commence construction, however this has been temporarily put on hold due to COVID-19 impacts and due to the delays associated with the planning approval process.
- The project has a CIV of \$44,124,337.02 (excluding GST), will provide 700 contractor jobs during construction and an additional 200 commercial and retail jobs post construction.
- The project will see the restoration of the last heritage building within the Central Park Precinct with a heritage restoration value of \$10 million.

The Brewery Yard proposes a flexible commercial use to the site which has arguably attracted the most tenant interest due to the heritage fabric and flexible floor space layouts to suit a range of commercial floor plates. Tenants have been enthusiastic for the coal hopper features in the upper levels. The retention of the central coal hopper will have a significant adverse effect on the viability of the project by preventing access to Building 30 from level 1 upwards, and the loss of approximately 690m<sup>2</sup> of lettable area.

IP Generation has conducted an extensive analysis of the commercial viability of the project. The income earned from the upper floors in Building 30 underpins IP Generation’s ability to conduct the development, which includes over \$10m of heritage restoration works. These include the façade restoration, coal hopper restoration, grain silo re-interpretation, and heritage interpretation zones. The Brewery Yard building is intended by IP Generation to be the heritage focal point of the entire award-winning Central Park Precinct, however the heritage restoration works required to achieve this milestone are extensive.

Unfortunately, the financial impact due to the loss of this lettable area is enough that the project would no longer be commercially viable, and impacts associated with COVID-19 are presenting further debilitating feasibility issues to the applicant. We ask that DPIE consider the approval of The Brewery Yard as part of the Planning System

Acceleration Program, outlined in the recent Ministerial Media Release, to fast track shovel ready developments to continue to support the construction industry and NSW economy.

We trust that this information is sufficient for the DPIE to find further clarity as requested in their correspondence dated 16 January 2020 and begin to finalise their assessment for determination.

We will make contact with the City of Sydney to discuss the proposal with them again to explain the DIP process that has been undertaken and the changes to the design that have been made. Please let us know if you would like to be involved in this discussion. Should you have any additional queries please do not hesitate to contact the undersigned.

Yours sincerely,



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