

17 July 2020

218062

Anthony Witherdin  
Director, Key Sites Assessment  
Department of Planning, Industry and Environment  
12 Darcy Street  
PARRAMATTA NSW 2150

Attention: Amy Watson (Team Leader, Key Sites Assessment)

Dear Amy,

**RE: RESPONSE TO SUBMISSION REQUIREMENTS – DEPARTMENT OF PLANNING, INDUSTRY & ENVIRONMENT**  
**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.

Specifically, we write in response to your correspondence dated 10 June 2020 requesting that the applicant provide additional information to enable the finalisation of the assessment of the application, including:

- a response to all issues and comments provided in Council’s submission dated 27 May 2020, in particular a response to points 1.1-1.6 and 2,
- Any refinements to the proposal required to respond to the Council submission were are to be prepared in consultation with the Design Integrity Panel, and
- evidence of further consultation with the Design Integrity Panel, including a final report.

Our response is set out below.

## 1.0 Response to DPIE & City of Sydney Correspondence

**Table 1 Response to DPIE correspondence**

DPIE Requirement	Applicant Response
1. A response to all issues and comments provided in Council’s submission	Refer to <b>Table 2</b> for a specific response to each point raised in the Council submission.
2. In relation to Points 1.1-1.6 and 2, your response, including any refinements to the proposal, should be prepared in consultation with the Design Integrity Panel	As part of the DIP process the items below were reviewed:  <b>1.1 Rooftop Addition</b> – After considerable discussion with the new DIP, the Panel members accepted that the new roof composition over Buildings 22 and 23 could acceptably extend the creative 3D dynamic of the existing roofscape, which is largely characterised by the new sculptural composition of the tri-generation plant. The DIP recommended that the roof form be amended to achieve a more elegant design for the main roof and eastern access stair. The revised roof form was designed collaboratively with the DIP

	<p>to achieve the current outcome and is now shown on the revised plans that were submitted with the RTS dated 23 April 2020.</p> <p><b>1.2 New External Stair Tower</b> – The Panel members considered that the proposed external stair connected to the north-west corner of Building 23 was an acceptable intervention and related well to the existing scale and industrial grain of the setting.</p> <p><b>1.3 Removal of one coal hopper in building 30</b> – The removal of the coal hopper in Building 30 was discussed extensively with the Panel members as a key item at the meeting. The removal of the coal hopper is to provide additional three new floors into the upper space of the very large Coal Hopper Hall to gain additional floor space for the project. The additional floor space is an important component of the viability of the adaptive re-use project. The Panel members considered that the creation of a different form of industrial space, when compared with the massive scale of the existing volume, was an acceptable outcome for the project. Nevertheless, the Panel members called for some form of future historical interpretation to celebrate the role and purpose of the third hopper on site.</p> <p>To respond to this recommendation made by the DIP, it is proposed to install an architectural mesh form of the third hopper, intended to mimic the removed hopper. Further, an additional interpretation zone is proposed on site which will include photos and historical context in relation to the historic use of the site with a focus on the role of the hoppers. The interpretation zone will include reading panels which will be installed external to the building on the existing chimney tower at ground level.. The installation will enable visitors to observe the photos, text and will provide viewing opportunities at this location to the remaining hoppers through the northern glazed wall.</p> <p><b>1.4 Reorganisation of floor levels internally for additional mezzanine floors</b> The Panel members reviewed a detailed visual analysis study prepared to showcase the amount of visibility of the hoppers from the public realm, taking into account the proposed positioning of the floor slabs as seen through the glazed northern wall. The Panel considered that the internal views, with the internal floors from Levels 2, 3 and 3 Mezzanine, were still able to deliver a dramatic and spectacular experience for future occupants, subject to some reduction in the floor plate of Level 3 Mezzanine.</p> <p>The Panel recommended that the floor plate of the proposed Level 3 Mezzanine be recessed slightly further from the retained hoppers to match the separation created for Level 3. The project has adopted this recommendation as exemplified through the amended architectural plans submitted on 23 April 2020.</p> <p><b>1.5 Removal of silos in building 23</b> – The DIP members determined that the existing silos should be removed, with a condition that the proposed interpretive elements are constructed elsewhere. This has been accepted by the CoS Council as well as being an acceptable outcome.</p> <p><b>1.6 Modifications to external windows and doors</b> – The modifications proposed to the existing window and door frames was reviewed by the DIP. The Panel noted that the existing building had been previously modified so often that there is no conclusive consistent pattern of the surviving window joinery or composition of sashes. The Panel members agreed that the complex variety of window detailing should be retained in the adapted building and generally accepted the proposed architectural approach to tailor each window treatment individually to provide the best outcome for the existing</p>
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	<p>windows, and to rectify the damaged windows with new sympathetic window framing and glazing materials to best match the surviving condition.</p> <p><b>2. Impacts on Northern Façade</b> – There was considerable discussion between Panel members regarding the options for the northern facade on Building 30. Please note that the façade is not an original feature but the result of an earlier demolition event. The previous design decision to steepen the angle of the “bird’s mouth” glazing was driven by a need to provide additional space for the tri-generation plant services. During the construction of the tri-generation plant, the design was reviewed and the services were maintained within the roof space. The DIP concluded that the current proposal is a superior outcome than the previous design, from an architectural perspective.</p>
<p><b>3.</b> Evidence of further consultation with the Design Integrity Panel, including a final report.</p>	<p>A presentation to the new DIP members was held in person and via Zoom video conferencing on 20 March 2020 in which a presentation on the revised scheme was held by representatives from the consultant team. Following the initial comments from the DIP and in consultation with the members thereafter their recommendations were incorporated into the amended design, submitted to DPIE.</p> <p>The DIP issued their final report dated 9 April 2020 which was prepared based on the revised architectural plans issued as part of the RtS on 23 April 2020.</p> <p>Attachment 1 is confirmation from the DIP that their recommendations have been incorporated and are satisfactory.</p>

**Table 2 Response to Council comments**

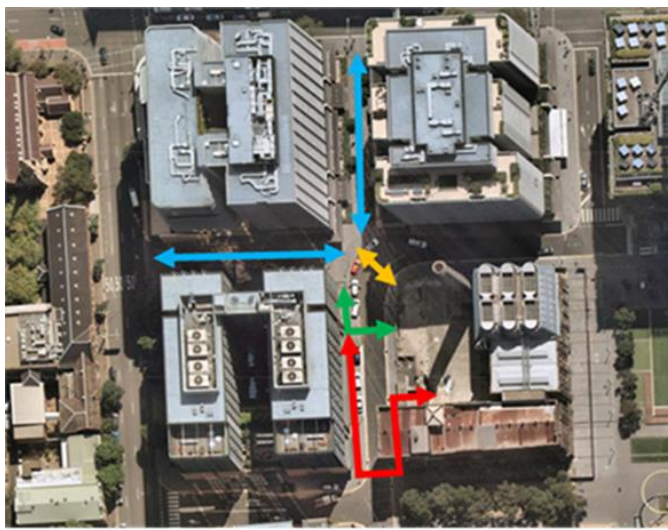
City of Sydney Recommendation	Applicant Response
<p><b>1.0 Heritage Impacts</b></p>	<p>Noted. The applicant would be happy to accept a condition of consent reflecting this.</p> <p>Please note that Archival Recording was provided by Frasers as part of Stage 1 of the DA.</p>
<p><b>1.1 Rooftop Addition</b> The submitted RtS includes an amended roof form that increases the setbacks from the eastern and western facades and modifies the roof form to reduce the impact of the addition on views to the building. The amended design reduces the visual impact from the public domain and is acceptable.</p>	<p>Noted.</p>
<p><b>1.2 New external stair tower</b> The City previously noted that the additional stair tower had a high visual impact but was acceptable. The plans indicate the external mesh material will be constructed of steel, however, it is recommended that the applicant consider the use of zinc to be consistent with the existing material of the plant above building 30 and to reduce the amount of additional materials.</p>	<p>Further to consultation with the City of Sydney, we accept the recommendation to use a zinc mesh cladding for the external stair in order to be consistent with the existing material of the plant above building 30.</p> <p>The zinc mesh is to replace the stainless steel indicated in the application to reduce the amount of additional materials in the building, to minimise views of the details of the stair and to provide a level of transparency and lightness to the stair element.</p> <p>Please refer to <b>Attachment 2</b>.</p>
<p><b>1.3 Removal of one coal hopper in building 30</b> The submitted RtS still proposes the removal of the central coal hopper within Building 30. The impact is still considered as detrimental. Should approval be granted to the removal of this original element, the additional floors</p>	<p>The revised proposal (issued in April 2020) maintains views from the public domain, enhances the interpretative potential of these views with the addition of a new element reflecting the geometry of the soffit of the hopper proposed to be removed and vastly improves interaction with the existing hoppers by providing a</p>

<p>constructed in its place are recommended to be reduced and modified to allow for better visual appreciated to the remaining two coal hoppers from the public domain.</p>	<p>bridge between the remaining historic fabric, thus providing a range of new interior viewing opportunities as well as interpretative possibilities.</p> <p>The revised proposal shows the reinterpretation of the bottom of the middle hopper in metal mesh, reflecting the mesh material from the tri-generation plant and external stairs. The bottom section of the hopper will be able to be viewed from the public domain. No reinterpretation works are proposed to the upper section of the hopper, which is able to be visible from the public domain due to the bridging between building 26 and building 30. The void space at the upper section of the hopper provides a direct relationship between the remaining hoppers and the viewers located inside the building.</p> <p>Please refer to <b>Attachment 2</b>.</p>
<p><b>1.4 Reorganisation of floor levels internally for additional mezzanine floors</b></p> <p>The amended plans submitted in the applicant’s RtS modify the location of the additional commercial floors to provide an improved view of the coal hoppers from the public domain. The amendments are still considered to have a negative impact on views to the significant building features. The City advises that a reduction in floor space to allow for improved views to the hoppers is more consistent with the original objective of the masterplan for the precinct and has a better heritage outcome.</p>	<p>The proposal to integrate new floor space into this volume will allow a more intimate interaction with these heritage objects albeit with the removal of one of the hoppers to allow access to the northern part of the floor plate. A design alternative developed during the consultation with the DIP maintained the interpretive potential of close contact with the retained hoppers across different floor levels, and improved visual access from the public domain by the redistribution of floors and voids in this space.</p> <p>The design amendments also provide required floor space to assist the feasibility of the adaptive re-use of the proposal as whole. The proposed use was found to be the most compatible from a heritage perspective, allowing the integrity of the interior to be mostly retained compared to all other use options. This has been supported by the Design Integrity Panel.</p> <p>Please refer to <b>Attachment 2</b>.</p>
<p><b>1.5 Removal of silos in building 23</b></p> <p>The RtS provides justification supporting the removal of the concrete silos and additional information regarding the reconstruction and interpretation of the elements in the proposed construction. This form of interpretation is acceptable and the City raises no further issue.</p>	<p>Noted.</p>
<p><b>1.6 Modifications to external windows and doors</b></p> <p>The applicant provides additional justification to support the removal and replacement of the original steel windows including achieving environmental performance as a factor. This is supported by the City, however it is recommended that some original windows be retained in their position and restored. A secondary glazing layer could be installed in order to achieve thermal performance. It is recommended that final detailed drawings of the replacement windows and restored windows be submitted prior to the issue of a Construction Certificate.</p>	<p>Preliminary investigations have revealed that a large number of the existing windows are damaged beyond repair or refurbishment.. It is intended that new materiality to the windows will be constructed of a contemporary bespoke aluminium frame with high performance glazing to improve the environmental performance of the building as a whole. The applicant would be happy to accept a condition to refurbish two windows on the heritage significant southern façade.</p>

<p><b>2 Impacts on northern façade</b></p> <p>The City notes that the RtS has provided additional detailing in the northern glazed façade and further justification to amend the frontage to provide an opportunity for additional floor space within the building. The City maintains concern that the current constructed roof form and north façade design will be diluted as a result of the proposed design as per previous correspondence.</p>	<p>The applicant reiterates their position in that revised design does not dilute the quality of architecture of the existing roof form or the northern façade design. The detailing of the front façade is fully integrated with the design of the existing building and more recent plant area additions that form the new roof top addition. Comments in detail as follows.</p> <ol style="list-style-type: none"> <li><b>1. Relationship to the existing heritage building roof line.</b> The new façade design exactly aligns to the parapet line of the existing adjacent brickwork and then changes geometry above the parapet to slope at right angles to the soffit at the upper level of the hoppers within the northern roof. The current roof and soffit alignment were designed to integrate services below the tri-generation plant, which are no longer required. This design, whilst not apparent from the public domain, with reduced space now better utilises the space provides an improved relationship of this space to the existing hoppers. Traces of previous rooflines are still visible from the interior fabric, enhancing the interpretation of the history of this structure.</li> <li><b>2. Design Integrity of the northern façade.</b> The monumental ground floor opening has been retained and enhanced through post SSDA design development. To improve the design integrity of the northern facade, detailing of the steel work, glazing frames and sloped opening on the upper level has been designed to provide a clear articulation and relationship to the existing fabric and building scale. The tripartite glazing design concept of the original design of the northern façade has been improved with the revised design.</li> </ol> <p>There was considerable discussion between Panel members regarding the options for the northern facade on Building 30. Please note that the façade is not an original feature but the result of an earlier demolition event. The previous design decision to steepen the angle of the “bird’s mouth” glazing was driven by a need to provide additional space for the tri-generation plant services. During the construction of the tri-generation plant, the design was reviewed and the services were maintained within the roof space. The DIP concluded that the current proposal is a superior outcome than the previous design, from an architectural perspective. Please refer to <b>Attachment 2</b>.</p>
<p><b>3 Ecologically Sustainable Development</b></p> <p>The submitted RtS confirms the development is designed to achieve a minimum NABERS Energy 5.5 Star rating. It is recommended that confirmation of this agreement and a copy of an independent energy assessment report be provided to the City prior to the issue of a Construction Certificate. Further, the RtS suggests that sustainability measures will be implemented in the project and requests a condition of consent reflect this.</p> <p>The RtS has not provided any clarification as requested as to whether the development will take up any on-site</p>	<p>The Brewery Yard Building will be a refurbishment project, as such we propose that a 5 Star NABERS Energy Rating is provided. An Ecologically Sustainable Development report was provided as part of the SSDA which provides an overview of the proposed Ecologically Sustainable Design (ESD) principles and efficiency measures. The development will integrate a number of site wide strategies such as the centralised thermal plant and the central recycled water plant. It is noted that there are limited places where photo voltaic cells could be placed without having an adverse impact on the significance of the building or the public domain.</p>

<p>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><b>4 Transport and Access</b>  <b>4.1 Parking bay and loading and servicing</b>                  The City acknowledges the application made to amend the on-street parking restrictions to allow short-term parking for loading and unloading purposes. It is also advised that the applicant make arrangements with surrounding building owners/management to utilise on-site loading spaces should there be no available on-street loading. This issue is further discussed below in Section 9.</p>	<p>As documented in the Response to Submissions (GTA, 3/2/2020) and subsequent Loading Zone Proposal for consideration at Local Pedestrian, Cycling and Traffic Calming Committee (GTA, 4/3/2020), the use of on-site loading docks in the precinct was considered. However, it was determined that the respective travel distance would likely result in delivery vehicles searching for any vacant on-street parking including in the 15-minute parking in the northwest corner of Central Park Avenue.</p> <p>Delivery, waste collection and removalist vehicles would also be able to make use of the forecourt area outside business hours, with a layback proposed to be installed on the northern boundary of the site with removable bollards to restrict access times. Please refer to Attachment 4.</p> <p>These arrangements are considered adequate for the anticipated demand. On this basis, it is not proposed to pursue arrangements with other building owners/ management for the use of their on-site loading docks. However, should any operational issues arise that would benefit from such an arrangement, an agreement with the landowner is open to be pursued further at that time.</p>
<p><b>4.2 Bicycle parking and end of trip facilities</b>                  Amended plans include the location and general fitout of bicycle parking and end of trip facilities. It is recommended that the final consent require appropriate bicycle parking spaces for workers and visitors and end of trip facilities be provided and be consistent with the rates as specified in the City’s previous correspondence.</p>	<p>Noted – a concept plan prepared by Tzannes in December 2019 illustrated bicycle parking and end of trip facilities, which will be further developed as part of design development to show the provision of bicycle spaces for staff and visitors in accordance with CoS and GTA advice.</p>
<p><b>4.3 Green Travel Plan and Transport Access Guide</b>                  Although the recommended Green Travel Plan and Transport Access Guide have not been submitted for review during the assessment of the proposal as requested, it is acceptable to submit these documents post-determination. It is recommended that each document be submitted and approved prior to the issue of a Construction Certificate in consultation with Council.</p>	<p>Noted.</p>
<p><b>5 Access within the site</b>                  The applicant’s submitted RtS includes an amended ground floor foyer design that removes the external addition to improve sight-lines within the through-site link. This is consistent with recommendations made by the City previously and is supported.</p>	<p>Noted.</p>
<p><b>6 Public Art</b>                  It is noted that the Final Public Art plan was submitted to the City’s Public Art team and included an artwork by Ugo Rondinone. The submitted RtS proposes the relocation of the artwork to an alternative space within the courtyard of the site.</p>	<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 has arrived in Australia and will be stored by the applicant until such time as it is ready to be installed.</p> <p>The original location nominated by Frasers is not suitable as it impairs pedestrian movements and is located within one of the</p>

<p>Overall, the provision of public art is supported and the following recommendations are made:</p> <ol style="list-style-type: none"> <li>The proposed re-location of the artwork should be undertaken in consultation with the curator and the artist.</li> <li>It should be noted in the assessment that the artwork intends to honour the memory of AIDS victims.</li> <li>The record of the ownership of the artwork and future maintenance plans be forwarded to the City as part of its record of public art in private development.</li> </ol>	<p>various easements which apply across the Brewery Yard forecourt.</p> <p>The revised location will be formally confirmed with the Curator and Artist.</p>
<p><b>7 Tree planters</b></p> <p>In previous correspondence, the City requested additional documentation demonstrating planters could be supported on site and provide sufficient soil depths and drainage. The applicant's RtS indicates appropriately sized planters and drainage. The new trees are 400L pot size Ficus benjamina (Weeping Fig) with under planting of shrubs and groundcovers.</p> <p>The planter design is suitable for a small to medium sized tree, however, the nominated species is a large tree which is capable of growing to 15 meters in height and spread in natural ground with a vigorous, invasive root system. In a containerised environment over time the tree will grow to a height become stunted, potentially root bound and impact on the understory planting. Accordingly, tree selection should be reconsidered to better suit the pot size.</p>	<p>Turf Design suggest to retain the current specified Ficus Benjamina for their resilient nature and proven urban hardiness. Although these trees can grow up to 15m from natural ground, the consequences associated with the lifespan of the tree was not intended to have an adverse outcome for the site. It was assumed with the given soil volume, these trees can grow up to 5m to provide the forecourt with human scale greenery. To complement, Turf Design have carefully selected understory species that are robust and suitable for the site wide character.</p>
<p><b>8 Waste Management</b></p> <p>An insufficiently detailed waste management plan has been provided as part of the application documents.</p>	<p>An amended Waste Management Plan has been submitted which addresses the issues raised in Council's letter, refer to <b>Attachment 5</b>.</p>
<p><b>9 Public domain and building lighting</b></p> <p>The amended proposal as submitted in the applicant's RtS still raises some concern in respect of the loading zone and overlap of service vehicle requirements and numbers. The existing 15 minute zone between Block 4s &amp; 1 has been provided for the childcare centre and will be in high use at certain periods of the day. The proposed use of this area as overflow is in conflict with the intended use and is discouraged. It is recommended that the report be amended and another option be considered.</p> <p>Similarly, the proposal to install additional pedestrian ramp crossings is unacceptable. Ramps are currently provided at the intersection of Central Park Avenue and Irving Street and are within sufficient distance to provide a crossing point for deliveries. Ramps will not be accepted if they are only required to provide private access across public land.</p> <p>It is understood that another option to access the site from the eastern side of the building from Chippendale Lane has been rejected. This was the original intended access point for loading vehicle access in the overall strategy for the site and a vehicle crossover was provided during the delivery of the road infrastructure. Discussions with the applicant</p>	<p>GTA have reviewed the comments made by CoS Council and note the following: The kerb ramps can be deleted from the loading zone proposal, however it should be noted that:</p> <ul style="list-style-type: none"> <li>The proposed pedestrian kerb ramps would be installed within the kerb extension section north of the proposed loading zone. It would not only provide a safe crossing point for delivery personnel but also for pedestrians (including persons with prams and/ or wheelchair) accessing the site to/ from Broadway/ Abercrombie Street via the pedestrian links on south and east sides of One Hundred Broadway.</li> <li>Pedestrians along this desire line are unlikely to use the kerb ramps provided at the Central Park Avenue/ Irving Street intersection given the additional travel distance (illustrated in red below). Therefore, the proposed kerb ramps will benefit the general public and not considered only for private access across public land.</li> <li>The proposed crossing point (path show in green) would also assist with reducing informal crossing activities through vehicles parked in the existing indented bays on the northwest corner of Central Park Avenue, which would be the natural desire line (shown in yellow). This presents a safer crossing opportunity noting the short-term parking results in high vehicle turnover.</li> </ul>

<p>indicated that access through the building was unavailable to allow this area to be used.</p> <p>Prior to any final comments or recommendations being provided by the City in response to public domain and access, it is recommended that the applicant provide clear documentation showing new vehicle crossover locations and turning circles for the intended vehicle size.</p> <p>It is also noted that some plans in the public domain and landscaping drawing submission still show previous designs at the ground floor, and particularly the now superseded entry foyer design. It is recommended that final public domain plans consistent with approved architectural drawings are submitted.</p>	 <p>The new vehicle crossover proposed on the northern boundary of the site is shown in revised Public Domain plans in <b>Attachment 4</b>, included as part of the RTS response. This is intended for <b>overflow loading requirements out of business hours</b> should the amended loading zone spaces be occupied. Removable bollards will be installed to restrict vehicle access to the forecourt during business hours. Vehicles will be required to reverse into the forecourt in order to exit in a forward direction; a key reason why access to the forecourt will be restricted during business hours. This is considered an appropriate arrangement out of business hours and common for low demand usage. This arrangement would be suitable for vehicles up to 8.8 metre medium rigid vehicles. Please note that this is not the permanent solution for the site due to the easements in the forecourt for servicing the Central Thermal Plant.</p>
<p><b>9 Public domain and building lighting</b></p> <p>It is also noted that some plans in the public domain and landscaping drawing submission still show previous designs at the ground floor, and particularly the now superseded entry foyer design. It is recommended that final public domain plans consistent with approved architectural drawings are submitted.</p>	<p>Please refer to <b>Attachments 3 and 4</b>.</p>

We trust that this information is sufficient for the DPIE to find further clarity as requested in their correspondence dated 10 June 2020 and proceed 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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