

27 May 2020

File No: 2020/214443
Our Ref: R/2018/13/B
Your Ref: SSD-9374

Lewis Demertzi
Student Para Planner – Key Sites Assessments
Department of Planning, Industry and Environment

Via Planning Portal

Dear Lewis

Request for advice – Modification of Central Park Concept Plan (MP 06_0171 MOD 16) and Block 4B Central Park Adaptive Reuse (SSD-9374)

Thank you for your correspondence dated 8 May 2020 which invites the City of Sydney Council (the City) to provide comments on the Response to Submissions (RtS) for the State Significant Development (SSD) for the adaptive reuse of the Brewery Yard buildings known as Block 4B within the Central Park redevelopment precinct.

The City has reviewed the RtS and agrees to withdraw our objection but only subject to the consideration and implementation of design modification or submission of additional information. The City provides the following comments for your consideration:

1 Heritage impacts

The City has conducted review of the amended proposal and supporting written documents and notes that some attempt to ameliorate the impacts of the loss of original fabric have been included in the RtS. Although it is noted that the loss of original fabric is considered a great loss to the historic significance of the site.

It is recommended that a detailed schedule of conservation works be submitted and approved in consultation with the City prior to the issue of a Construction Certificate. Additionally, it is recommended that a detailed Heritage Interpretation Plan (HIP) be prepared by a suitably qualified and experienced heritage practitioner or historian and submitted and approved in consultation with the City prior to the issue of a Construction Certificate. The HIP is to include the following:

- a) Details of how information on the history and significance of the site will be provided for the public and make recommendations regarding public accessibility, signage and lighting;
- b) Confirmation of appropriate media (including type of media, materials and contents) and locations for interpretation; and
- c) Development of content and detailed briefs for specific interpretation media to ensure media is integrated into the overall design response to the site and public domain.

The interpretation areas detailed in the approved plan must be implemented and constructed within the site prior to the issue of an Occupation Certificate. It is requested that the final details of interpretation media including final materials, forms and dimensions be provided to the City prior to installation. Further it is recommended that the City be granted a final inspection after the installation of interpretation features prior to the issue of an Occupation Certificate.

It is also recommended that archival recording of the site should be undertaken and submitted in consultation with the City. The recording should include accurate measured drawings of the following:

- a) The building and the site as a whole including:
 - (i) Location Plan
 - (ii) Site Plan (1:500 or 1:200)
 - (iii) Floor Plan/s (1:100 or 1:50)
 - (iv) Roof Plan/s (1:100 or 1:50)
 - (v) Elevations and Sections (1:100 or 1:50)
- b) Components of the building including windows, trussers, rainwater heads and other significant details and indicate 1:10 or 1:5 scale.

Measured drawings should be cross-referenced to each other, clearly titled, indicate scale, orientation and date of execution. The drawings can also be annotated or hatched to reveal more about the heritage significance of the site or object (e.g. to differentiate between dates of construction, materials and finishes and vegetation types).

The City provides additional comments to specific aspects of the proposal as raised in previous correspondence below.

1.1 Rooftop Addition

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.

1.2 New external stair tower

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.

1.3 Removal of one coal hopper in building 30

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 constructed in its place are recommended to be reduced and modified to allow for better visual appreciation to the remaining two coal hoppers from the public domain.

1.4 Reorganisation of floor levels internally for additional mezzanine floors

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.

1.5 Removal of silos in building 23

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.

1.6 Modifications to external windows and doors

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.

2 Impacts on northern façade

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.

3 Ecologically Sustainable Development

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.

The RtS has not provided any clarification as 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.

4 Transport and Access

4.1 Parking bay and loading and servicing

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.

4.2 Bicycle parking and end of trip facilities

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.

4.3 Green Travel Plan and Transport Access Guide

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.

5 Access within the site

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.

6 Public Art

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.

Overall, the provision of public art is supported and the following recommendations are made:

- a) The proposed re-location of the artwork should be undertaken in consultation with the curator and the artist.
- b) It should be noted in the assessment that the artwork intends to honour the memory of AIDS victims.
- c) 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.

7 Tree planters

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.

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.

8 Waste Management

An insufficiently detailed waste management plan has been provided as part of the application documents. The waste management plan must clearly address the following issues:

- a) There is frequent mention of food and beverage tenancies when describing the Retail component of the development. Food and beverage areas generate significantly more waste than general retailing. Recalculations for waste generation and storage should be undertaken assuming a percentage of Ground Floor will be 'restaurant and eating'.
- b) Waste generation calculations to support proposed number and configuration of bins are to be based on gross floor area of each development type. Please refer to the City's *Guidelines for Waste Management in New Developments 2018* for more information.
- c) Servicing requires collection contractors to move multiple bins across a road. At least 65 waste and recycling bins would be moved over the road at least twice a week. Safety considerations are to be addressed.
- d) The application proposes that 'cleaning staff will transport the bins to the short term parking area on the Ground Level'. This is unacceptable. Commercial waste and recycling receptacles and any bulky waste must be stored on the property at all times and must not be placed on kerbside for collection.
- e) Waste storage areas are to be reconsidered to be located within close proximity of pick-up locations. The City recommends the maximum manual handling distance between the storage point and the collection point for bins is 10m for 240L bins.
- f) Bulky Waste Storage of 12sqm is to be provided for this development and shown on plans.
- g) The waste management plan provided is for the operational phase of the completed development only. Waste management plans for demolition and construction including material storage areas for reusable materials and recyclables during demolition and construction; vehicle access to material storage areas; estimation of quantities and types of materials to be reused, recycled or left over for removal from the site are required. A template is available at Appendix A and B of *the Guidelines for Waste Management in New Developments 2018*

The waste management plan must also comply with the storage, waste and recycling collection, and general conditions detailed below:

- a) Commercial tenancies must have a commercial waste contract(s) in place prior to commencement of business trading.
- b) Commercial waste service collection services and waste storage arrangements must be conducted in accordance with the City's *Waste Policy – Local Approvals Policy for Managing Waste in Public Places (2017)*.
- c) If a grease trap is present it must be serviced from within the site boundary or from another access point and not from the cycleway due to safe access impacts on the cycle way from pump the out hose.

9 Public domain and building lighting

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 Clock 4s & 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.

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.

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 indicated that access through the building was unavailable to allow this area to be used.

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.

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.

Should you wish to speak with a Council officer about the above, please contact Marie Burge, Planner, on 9265 9333 or at mburge@cityofsydney.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'GJahn', written in a cursive style.

Graham Jahn AM
Director
City Planning, Development & Transport