

Submission to Central Precinct rezoning proposal



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Executive summary

The City of Sydney (the City) supports the future redevelopment of the land above and around Central Station rail yards with an approach that is people-focused, place-led and prioritises future-focused business and jobs growth. In 2008, Sustainable Sydney 2030 proposed that the airspace could be better used as a well-designed extension of Central Sydney uses.

In general, the strategic intent of the proposal is consistent with the City's Local Strategic Planning Statement and Central Sydney Planning Strategy. These strategic documents envisage significant business and jobs growth for the area supported by improved pedestrian connections, high-quality public domain and Central Sydney's future third public square to be realised adjacent to Central Station and George Street. The area should have safe and walkable connections across the rail lines and flexible workspaces that set a new benchmark in environmental performance and design development while protecting sun access to Prince Alfred Park.

Fostering jobs growth and delivering an authentic, high quality urban experience at Central will play a critical role in the expansion and diversification of Greater Sydney's economy. The City is committed to the overall vision for the Camperdown Ultimo Collaboration Area, rebranded as Tech Central, which looks to diversify the economy beyond financial and professional services toward jobs and an emerging economy fit for the 21st century. The co-location of leading institutions and businesses in emerging and growing sectors provides the conditions for greater innovation and enterprise outcomes. To contribute to this, Central Precinct will need to create space that is flexible and supports innovation.

Attracting and catering to knowledge workers or 'human capital' by creating a 24-hour epicentre of activity, interest, culture and creativity will better position Sydney to compete globally to attract this talent and serve the surrounding communities.

Central Precinct is ideally positioned to cater for this growth being the most accessible urban renewal precinct in Australia, with its proximity to public transport and existing and growing employment clusters.

The City supports development in this location, but there are significant issues within the proposal which need to be resolved for the development to deliver on the vision. The City is committed to working with the NSW Government to responsibly and thoughtfully review and update the planning controls for the Central Precinct to maximise outcomes for our residents, workers, visitors and businesses.

The City has reviewed the draft Explanation of Intended Effects (EIE), Design Guide, Planning Report, and supporting technical studies. **The City objects to the following aspects of the proposal**, which need to be more fully resolved to position development at Central Precinct for long term success:

- **The future operations and capacity of Central Station should be safeguarded, as the primary transport interchange in Greater Sydney.** The impacts of the proposals on rail services are unclear. The planning of the over station development (OSD) deck, the track level and the Precinct above should happen together to reach the best outcome.
- **Development should provide contributions and infrastructure to meet to the needs of the additional population resulting from the development.** The proposal places a heavy focus on the delivery of infrastructure within the Precinct itself and proposes the delivery of many items which are not genuinely local infrastructure, but are required for the delivery of the project, instead of providing monetary contributions. A revised local infrastructure schedule should be developed in close consultation with the City. The schedule should include the priority items of local infrastructure identified by the City and more broadly consider

infrastructure needs arising beyond the Precinct boundaries.

- **Development should create better public space in existing and planned public spaces around the development.** This includes maintaining sun access to Prince Alfred Park, the existing city streets, and the future Central Square. The development must not make the wind conditions or solar access worse in any area affected by the development. TAHE must work closely with the City to resolve the level change at the interface with Prince Alfred Park and to deliver the full vision for Central Square.
- **Any proposal should provide well-designed new public places, with good sunlight, greening, sky view and good wind conditions.** Much of the new open space created is poorly defined, overshadowed or suffers from poor wind, soil and water conditions. The streets are too narrow and lack activation on both sides. These conditions in turn create challenges for tree growth. The masterplan should be adjusted or reconsidered, to locate public space in the places of best amenity.
- **The proposal should include ambitious sustainability targets, to be carbon negative and restorative in every way.** While the proposal includes high-level objectives, it lacks the commitment to targets and prescriptive guidance required to deliver a low carbon and environmentally sustainable precinct. There is a lack of consideration towards the delivery of precinct-wide or development-wide sustainability systems.
- **The proposal needs to better integrate with the surrounding city to be a part of the city, and not apart from the city.** The streets, blocks and buildings replicate the obvious mistakes of Barangaroo South, without the drawcard benefit of the foreshore promenade. The streets are too narrow, connections from the surrounding streets and spaces are narrow, steep and not legible and only one clear east-west connection is provided, from Devonshire Street across to Lee Street. The other routes shown are convoluted, indirect or reach dead ends. The proposal should provide at least one more direct route for pedestrians and cyclists from Redfern heading north and west.
- **Development should prioritise building types which will support 21st century jobs and economy, not be aimed at premium grade office space.** The City does not support the optimisation of premium grade office space as the primary determinant for the planning of this important area. The proposal must be reconsidered to give primacy to variable space for innovative industries, including more affordable workspace to make it attractive for these types of businesses to relocate there and specific building types suitable for entertainment, retail and cultural uses.
- **Housing for all is needed here.** Given the land is publicly owned, 25% affordable housing should be provided on site (rather than 15%). A further 15% diverse housing is supported but should preferably exclude Build-to-Rent, which is typically a higher end product, with rents at a premium to typical market rents. A commitment to 10% Aboriginal and Torres Strait Islander occupancy of the affordable housing provision should be included in the proposal.
- **The amount of floor space and density is too high.** Gross Floor Area (GFA) and the Floor Space Ratio (FSR) have not been calculated accurately, resulting in floor space inflation. Furthermore, the current reference scheme is overly bulky, with too many towers, too close together, resulting in significant visual impact, deterioration of heritage significance, buildings not fit for innovation, and unacceptable wind conditions and insufficient sunlight in public spaces.
- **Development should respect the heritage significance of the site and celebrate the site's significant landmarks.** Consideration must be given to the cumulative heritage impact of development. The City appreciates the considerations thus far but does not support the loss of significant additional views to the clock tower as a result of too many buildings, too close together.

- **Design, construction, and the future use of the space should be led by Connecting with Country principles.** Engagement with First Nations people should be ongoing and meaningful. Beyond the design of public spaces, a stronger commitment is needed on how the proposal will deliver ongoing benefits for First Nations communities, including housing diversity and cultural spaces.
- **The proposal should include planning controls that will ensure that the level of design excellence embedded in the reference design, will be delivered, and exceeded for all public spaces and buildings.** City of Sydney Competitive Design Policy should apply – it cannot be left to the development market and the lowest common denominator.
- **Engage proactively and meaningfully with local communities and businesses to reach a shared vision for Central Precinct.** Engagement to date and the length of the exhibition period are not commensurate with the complexity and significance of this once-in-a-generation opportunity and must be extended and amplified. The City has requested an 8-week exhibition period rather than 4 weeks. We were recently advised of a 2-week extension resulting in a 6-week exhibition period.

Introduction

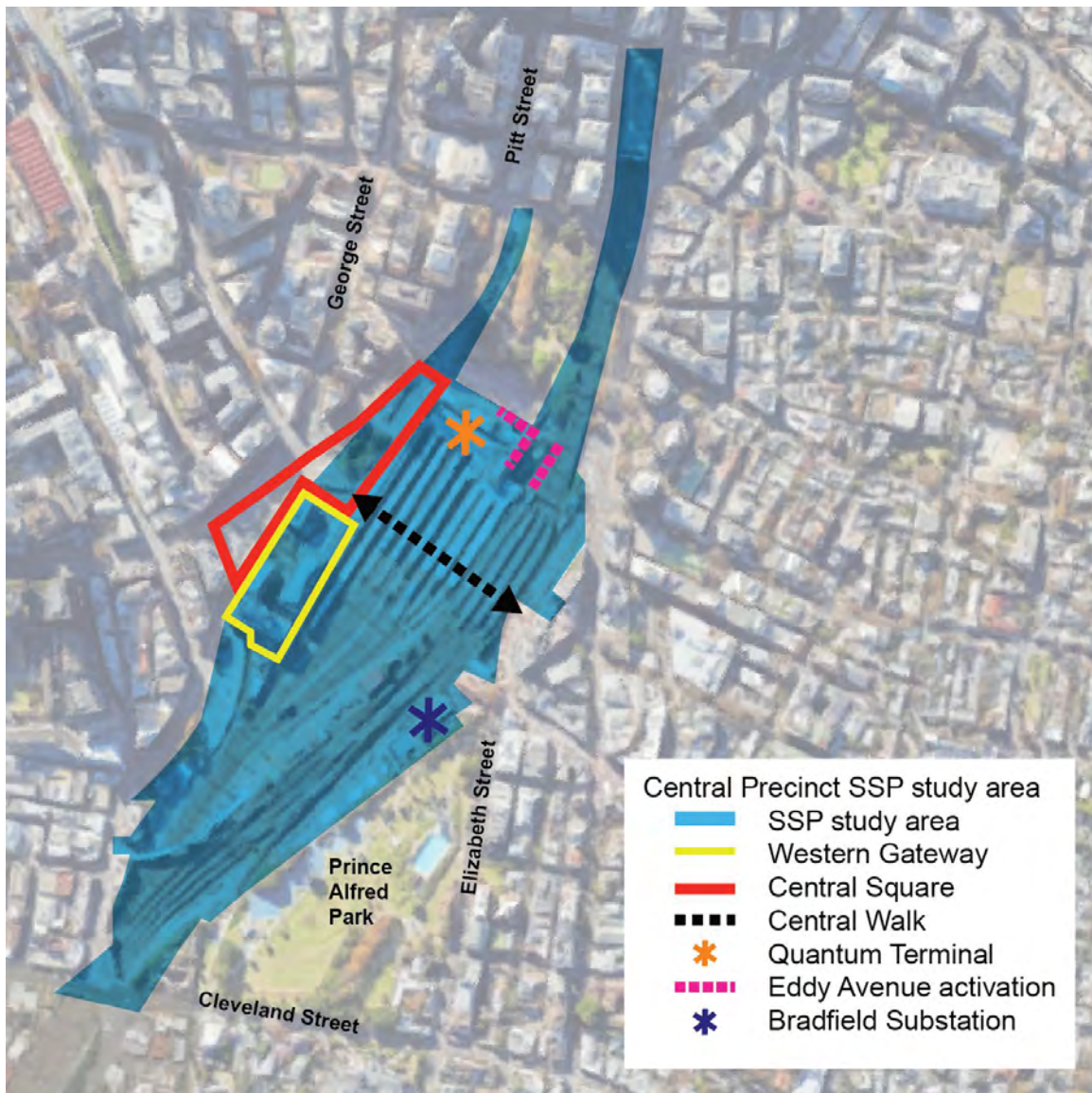
Background and context

Site context

Central Station is one of Sydney's most important places. The 24-hectare site is located approximately 1 kilometre south of Town Hall and is bounded by the localities of Haymarket, Chippendale, and Surry Hills. It is bound by Eddy Avenue to the north, Chalmers Street and Prince Alfred Park to the east, the Cathedral of the Annunciation of Our Lady and Cleveland Street to the south, and Regent, Lee and Pitt Streets to the west.

Figure 1. The site and related projects

Source: City of Sydney



The site became associated with railways in 1855 with the construction of the first Sydney Terminal and the starting point of the main line from which the NSW rail network grew. The present Central Railway Station, designed by Government Architect Walter Liberty Vernon, was opened in 1902 and was fully completed in 1921 with the addition of the clock tower. The tower was positioned to align with many nearby streets and is now a prominent landmark in the southern part of central Sydney. The entire site is listed on the NSW State Heritage Inventory, in recognition of its historical and cultural significance to the city and the state.

Central Station is the heart of the rail network for Sydney and New South Wales and is Australia's largest and busiest train station with 22 platforms providing suburban, intercity, regional, and interstate services. It is also a key node in Sydney's broader public transport network, connecting rail with Metro, light rail, bus, and coach services. The land is owned by Transport Asset Holding Entity (TAHE) and operated by Transport for NSW (TfNSW).

The City's vision for Central

Since the adoption of Sustainable Sydney 2030 in July 2008, the City has identified the land between Central Station and Cleveland Street as a natural southern extension of Central Sydney. Previous iterations of planning strategies for Central Sydney have said the same - in 1971 the site was suggested as a potential location for an indoor sports stadium or entertainment stadium, and in 1988 the airspace above the railway was identified as a potential opportunity for city growth, while noting "the need to ensure the adequacy of service, transport, traffic and utility infrastructure in areas surrounding the City Centre" (Central Sydney Strategy 1988, p35).

The Central Sydney Planning Strategy (2016) provided a clear strategic direction highlighting the importance of Central and its surrounds in supporting the future economic and employment growth of Greater Sydney. The Strategy noted that "the performance and growth of the rail network is inseparable from Central Sydney's prosperity" (Central Sydney Planning Strategy, p123).

The site was identified as being ideally located to cater for job growth with its proximity to existing and growing employment clusters. It had the potential to accommodate diverse employment floor space, targeted to a range of businesses, both big and small, local and international, and supported by community and cultural infrastructure. Planning controls were revised to deliver the Strategy including the addition of a new Sun Access Plane to protect Prince Alfred Park from over-shadowing between 12pm - 2pm all year round.

This potential future of Central was further emphasised in the City's Local Strategic Planning Statement, City Plan 2036, which highlighted the critical role the precinct would play in accommodating a high proportion of jobs floor space, boosting productivity and supporting the growth of existing knowledge-intensive employment clusters in the area.

It also emphasised how the appropriate redevelopment of the precinct could drive additional investment in the surrounding area by lifting its profile and improving its market perception both locally and globally. However, the rate of redevelopment will be influenced by the rate on increase in aggregate demand for innovation floorspace in Sydney and the lasting effects of flexible work arrangements and outsourcing and remote sourcing of specialist staff.

Urban Life

The SSP boundary includes the area the City has identified as the third square for Sydney, completing the George Street spine from Circular Quay to Town Hall and Central Station.

Jan Gehl's 2007 Public Space, Public Life study first envisaged a major new square at Central connected to other new squares at Circular Quay and Town Hall by the George Street spine. It has since formed part of Sustainable Sydney 2030 (2009), the Central Sydney Planning Strategy (2016) and the Local Strategic Planning Statement (2019) and most recently in Sustainable Sydney 2030-2050: Continuing the Vision.

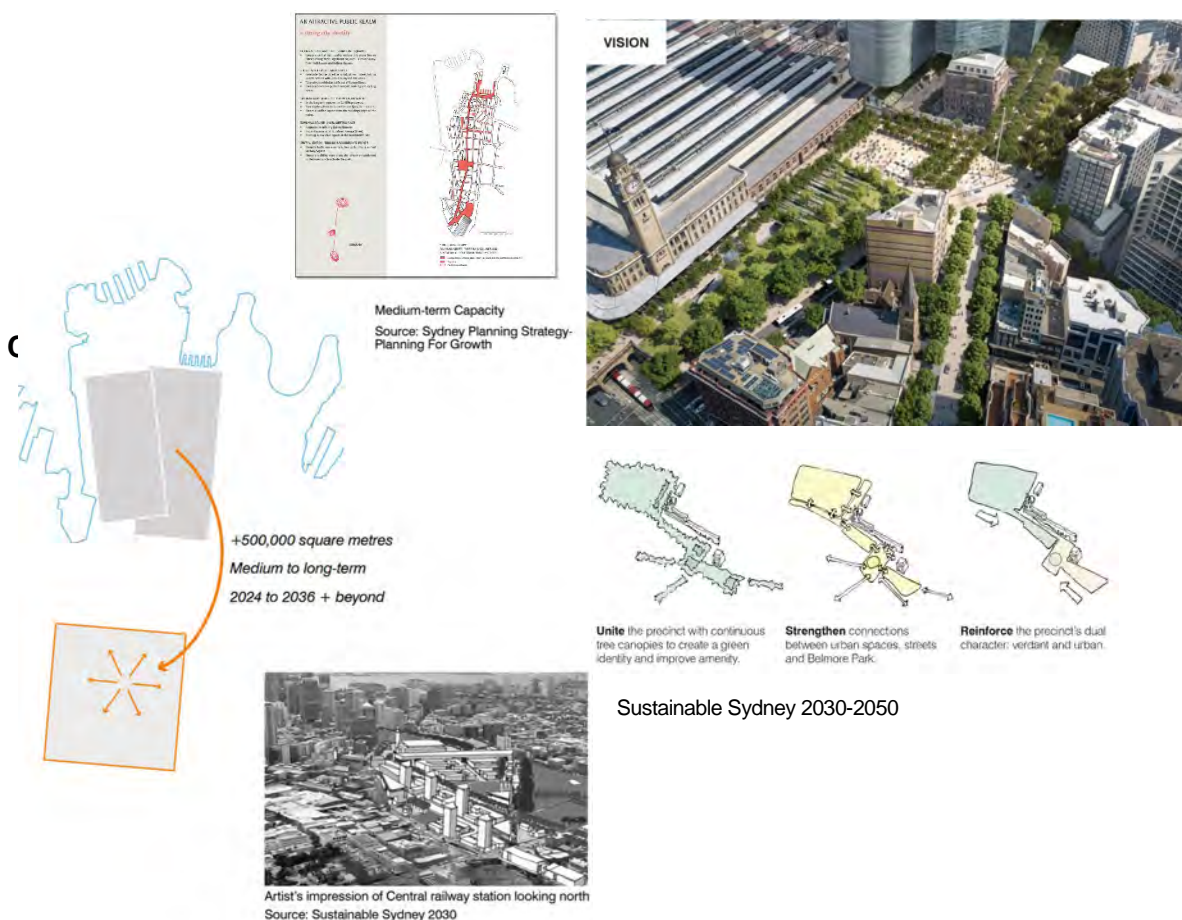
The Square will serve as a focal point and quality public setting for the area's growing creative and young professional workforce. Coupled with the opportunity to deliver buildings and public spaces

with the highest level of design excellence, the urban transformation of the precinct would enhance local connections between precincts, helping to establish walking and cycling connections east and west, north and south, knitting into the established network of streets and open spaces.

If supported by public space and public transport investment by both the City and NSW Governments, Central is well-positioned to be a once-in-a-lifetime opportunity to help grow a stronger, more competitive Central Sydney. If balanced with the need to conserve the unique heritage values of the precinct and maintain its current role as a vital transport interchange, the successful development of the Central Precinct could deliver flow-on benefits for Greater Sydney's global standing and contribute to its economic diversity and resilience.

Figure 2. Development at Central is on the City's strategic agenda

Source: City of Sydney



The City is a long-time supporter of the Camperdown-Ultimo Collaboration Area and member of the Camperdown Ultimo Alliance. We are working to grow innovation within Surry Hills, Haymarket, Ultimo, Camperdown, Redfern and Eveleigh, areas which are already home to some of Australia's most important innovation organisations. The co-location of institutions and businesses provides the conditions for greater innovation and productivity outcomes.

The Camperdown-Ultimo Collaboration Area has been rebranded as 'Tech Central' and the Greater Cities Commission and NSW Government are committed to facilitating the creation of 250,000sqm of floor space for innovators and 50,000sqm of affordable space for start-ups across the wider area. The development of Central Precinct is a key opportunity for the creation of this space. For Sydney, it is an opportunity for a more diverse and resilient economy – beyond financial and professional services, toward jobs and economies fit for the 21st century.

The process so far

State Significant Precinct Declaration

In July 2018, Transport for NSW (TfNSW) made a submission to the Department of Planning and Environment (DPE) to investigate the declaration of Central Precinct as a State Significant Precinct (SSP). In July 2019, the Minister for Planning and Public Spaces made such a declaration, acknowledging the importance of Central Precinct to Sydney and NSW, and enabling the commencement of planning for its renewal through preparation of the SSP Study. This declaration allowed planning to be undertaken in two stages:

- Stage 1: preparation of the Central Strategic Framework and rezoning of the Western Gateway sub-precinct.
- Stage 2: rezoning of the broader Central Precinct.

For the first stage, TfNSW and the Government Architect of NSW (GANSW) formed a State Design Review Panel, with a representative nominated by the City as a member, to review development proposals in the Western Gateway and the Central Strategic Framework. The Panel was to provide advice assisting TfNSW with lodgement and DPE assessment of the SSP. A Project Working Group (PWG) was established to support the Panel. For the second stage, a Project Review Panel (PRP) was also established, with a representative from the City, to consider planning control changes to implement the Strategic Framework.

Central Precinct Strategic Framework

The Strategic Framework represents the completion of Stage 1 of the planning process to develop a new planning framework for Central Precinct. Adopted in March 2021, it addresses the vision, key themes, planning priorities and design principles, precinct renewal options, and commitments to design excellence and sustainability, and defines and identifies the proposed future character of sub-precincts within Central Precinct. The five key themes for the vision of Central Precinct are place and destination, people and community, mobility and access, economy and innovation, and sustainability.

Western Gateway

The first part of Central SSP to proceed with development was the Western Gateway sub-precinct. Located at the western edge of Central Precinct, bordering Railway Square and Lee Street, the site consists of three development sites:

- Block A: the YHA and former inward Parcel Shed
- Block B: Henry Deane Plaza and associated office buildings
- Block C: the Adina Hotel and former Parcel Post building

Blocks A and B were rezoned in August 2020, enabling both the delivery of Atlassian's new global headquarters and a significant redevelopment proposal from a joint venture of Dexus and Frasers. The proposal will deliver 232,000 sqm of non-residential space for commercial, retail and hotel uses. Block C was rezoned in October 2021 to enable development above and adjacent to the Parcel Post building (the Adina Hotel) and provide an additional 43,000 sqm of non-residential space in the precinct. The remainder of Central Precinct is to integrate with the Western Gateway, through the management of public space and built form interfaces.

Central Precinct rezoning proposal

Since the Strategic Framework adoption and Western Gateway rezoning, TfNSW/TAHE have been developing their proposal with the City as observer of GANSW run Design Review Panel meetings. As well, the City has had representation on the Project Working Group and the Project Review Panel.

Submission to Central Precinct rezoning proposal

TfNSW/TAHE have now prepared their rezoning proposal for the Central Precinct. The proposal is on public exhibition for four weeks from Monday 22 August until (extended from Monday 19 September 2022). The City requested an extension to the exhibition period, which was granted.

Next steps

Following the exhibition period, the Department for Planning and Environment will determine the rezoning proposal. If adopted, the next step would be a development application(s) for the site.

To support this submission, the City has prepared a tracked changes version of the Explanation of Intended Effects (EIE) and the Design Guide which are provided as appendices. The City is committed to working with the DPE and TfNSW/TAHE to resolve the issues identified in this submission and to put in place robust planning controls which position the development for long term success and design excellence.

Key issues

The planning is up in the air and needs to be grounded

If built, the proposal will be the first in Australia and will join only a few cases internationally where a new Precinct has been constructed above (not beside) active rail lines. The City recognises the complexity and challenges involved and acknowledges TfNSW/TAHE on its ambition.

The current proposal seeks to rezone the airspace above the rail lines for over station development (OSD). However, it is important to note that the proposal and supporting technical studies do not transparently consider the engineering requirements or planning of the OSD deck, nor what will happen at track level. Construction of the deck and buildings proposed will require significant structure to be landed at track level, which is likely to require changes to the rail lines.

Development should safeguard the future operations and capacity of Central Station, as the primary transport interchange in Greater Sydney. Currently, no evidence is provided as to what the impact on rail services might be.

Recommendation: Demonstrate that the capacity and flexibility of rail services is protected into the future.

While the development in the airspace above the deck is being proposed through the state significant precinct planning process, the design of the deck itself and changes to the tracks below would be planned through the state rapid assessment framework for critical state significant infrastructure (CSSI). This proposal coming forward in isolation from the planning for the OSD deck and the service dock below the railway, poses several risks and challenges. Not only is this confusing for the local community and key stakeholders, but it negates the opportunity for the design of the three levels to influence each other and reach the optimal solution.

The lack of clarity or explanation about the nature of the deck makes it very difficult to ensure that noise and vibration assessment criteria and measurement are appropriate. For example, Provision 2 of Section 9.6 of the Design Guide lists the potential sources of noise and vibration to be considered when conducting a Noise and Vibration Assessment for a DA. It states that impacts from Sydney rail yard and adjacent suburban network are to be considered – this would appear to exclude the intercity lines underneath the proposed deck.

Similarly, servicing such as ventilation shafts will be required from track level upwards through the OSD deck. The locations of these are yet to be determined and are not included in the current proposal. These will be considered separately as part of a Critical State Significant Infrastructure application. There is a risk that these will punch up from below within the public realm, detracting from the quality of the streets and open spaces.

Recommendation: The planning processes for the airspace development above the deck and the infrastructure approvals below deck should be integrated to provide certainty of a coordinated outcome and clarity for the community about the implications of development on rail services.

Recommendation: Identify the location of ventilation shafts within the proposal. Amend the design guide to state that servicing of the area below the OSD deck is to be incorporated into the new buildings only and will not be located within the streets and public spaces.

The proposal sees the planning of airspace with no natural ground, which poses challenges to the planning process. With the planning and design process for the deck happening after this rezoning process, there is a risk that the level of the deck may change, having significant implications for the

design of the buildings above and the points of interface on all sides. The proposal has been evaluated in its fixed position and should not be seen to be 'floating' or able to shift up or down.

The Sun Access Plane for Prince Alfred Park has been put in place to protect overshadowing to the Park – a valued amenity for the community. It is critical that this plane is respected, and if the level of the deck were to be raised that the buildings would need to decrease in height to accommodate that increase while still respecting the sun access plane. This may mean that the full FSR is not achievable. Given this unique context of planning in airspace, the Design Guide should be amended to clarify the absolute boundaries and controls.

Recommendation: Amend the EIE to clarify that the proposed controls are based on the premise that the development is on an OSD deck at RL30.

Recommendation: Amend the design guide to clarify that levels of the sun access plane are absolute, not relative to the deck level and resultant floor space is an absolute and a maximum.

Recommendation: Given the long-term nature of the project, embed the requirement for the Design Guide to be reviewed and updated, in line with Government requirements for updating and maintaining local planning controls. Local infrastructure is needed to support this development

Local infrastructure

The City considers that the high density of development even after it is reduced in scale for the Central Precinct needs to be supported by local infrastructure with the capacity to meet the demands of new worker, resident and visitor populations. The City is well placed to assess and advise on local infrastructure needs, given our robust track record of funding, delivering and maintaining infrastructure assets throughout our local government area.

The approach to local infrastructure is not agreed and is in contention. The City raises the following strong concerns regarding the proposed approach to local infrastructure contributions in this rezoning proposal:

1. The proposal seeks to use a planning agreement for the delivery of infrastructure within the Precinct (much of which, in the City's view, is not genuinely local infrastructure) as an alternative to monetary contributions for future commercial development payable under the Central Sydney Development Contributions Plan 2020.
2. The proposal places a heavy focus on the delivery of infrastructure within the Precinct itself on TfNSW land, with little regard to the wider local infrastructure impacts and needs that will arise because of the significant scale of development proposed.

TfNSW's preferred approach for a planning agreement for local infrastructure is not agreed. Local contributions should remain payable under the Central Sydney Development Contributions Plan and there is no basis or agreement for proposing otherwise.

The Central Sydney Development Contributions Plan 2020 applies to the Central Precinct. Importantly, this plan specifically states that it applies to State Significant Development.

It is the City's firm position that local contributions (up to 3% of the development cost) would be applicable to development within the Central Precinct, including to State Significant Development.

The City does not agree to Transport for NSW's preferred approach for a planning agreement to be entered into for the items specified in the Planning Report's local infrastructure schedule (Table 21) as an alternative to the payment of local contributions. Table 21 is a misrepresentation of what a local infrastructure schedule is. It presents as a list of proposed infrastructure that is largely provided as part of and within the Central Precinct itself, rather than a list which has fully considered the infrastructure impacts of the development on the wider area. Furthermore, much of

this infrastructure is not genuinely local infrastructure – some of it is works to enable the development or works required to integrate new development with existing development. This infrastructure should be provided as part of the development, without seeking to offset its value against local contributions.

The City does not agree to offsetting contributions payable under the Central Sydney Development Contributions Plan to fund:

- **enabling works**
- **works that benefit the amenity of the precinct**
- **state owned community facilities (irrespective of whether it is run by a third party)**
- **state infrastructure such as health facilities or**
- **facilities that can be delivered by the private sector.**

Recommendation: The planning controls must require local contributions will be applicable to development within the Central Precinct to ensure adequate funding of local infrastructure needed by worker and resident populations. Offsets from local contributions will only be accepted for works-in-kind if the infrastructure is identified in the works schedule of the relevant City of Sydney contributions plan.

The City has reviewed the potential infrastructure items listed in Table 21 of the Planning Report and provided a response on their suitability for inclusion on a local infrastructure schedule and whether they may be provided as works-in-kind as offsets against local contributions payable under the Central Sydney Development Contributions Plan. Note the City is not objecting to the provision of the works. The City’s position is set out below:

Item	Description	Proposed potential ownership / management	Suitable for offset against local contributions?
Open Space and recreational infrastructure			
Central Green	New publicly accessible open space	TfNSW and development partner	No. This should be provided as part of the development. It is not proposed to be dedicated to the City.
Central Square	Delivery of new publicly accessible open space	TfNSW	No. While the City strongly supports the delivery of Central Square, this should be provided as part of the development. It is not proposed at this stage to be dedicated to the City. Could be the subject to further discussions.
Mortuary Station Plaza	New publicly accessible open space	TfNSW	No. This should be provided as part of the development. It is not proposed to be dedicated to the City

Submission to Central Precinct rezoning proposal

Item	Description	Proposed potential ownership / management	Suitable for offset against local contributions?
Open space embellishments	Embellishments to new publicly accessible open spaces.	TfNSW and development partner	No. This should be provided as part of the development.
Eddy Avenue Plaza	Improvements to the existing civic plaza, including new seating opportunities, landscaping and wayfinding	TfNSW	No. This should be provided as part of the development as new station access points are impacting this existing public space area.
Ibero-America Plaza	Improvements to the existing civic plaza, including new seating opportunities, landscaping and wayfinding	TfNSW	No. This should be provided as part of the development as new station access points are impacting this existing public space area.
Recreational infrastructure	Indoor or outdoor recreational facility comprising a minimum of 2 courts	Owned by TfNSW, managed by a community based organisation	Potential, this could be local infrastructure <u>subject</u> to dedication of ownership to City to ensure community benefits are realised in perpetuity.
Community / Cultural facilities			
Integrated multi-purpose community facility	Integrated multipurpose community facility (minimum 4,000 sqm GFA)	Owned by TfNSW, managed by a community based organisation	Not to be offset from contributions payable under the Central Sydney Development Contributions Plan.
Tech lounge	Secondary local community tech lounge (minimum 400 sqm GFA)	Owned by TfNSW, managed by a community based organisation	Not to be offset from contributions payable under the Central Sydney Development Contributions Plan. Similar services are provided at City libraries which are accessible from the site.
Aboriginal community and cultural space	Aboriginal community and cultural space (minimum 1,000 sqm GFA)	Owned by TfNSW, managed by a community based organisation	No. While the City is supportive of an Indigenous cultural space within the Central Precinct, it would not be appropriate for this to receive offsets against local contributions.

Submission to Central Precinct rezoning proposal

Item	Description	Proposed potential ownership / management	Suitable for offset against local contributions?
Other			
Affordable housing	15% of residential GFA	Managed by a community housing provider.	No. Affordable housing is not local infrastructure. It would not be appropriate for this to receive offsets against local contributions.
Health and education	Social / health services hub (minimum 400sqm GFA)	Owned by TfNSW, managed by community based organisation.	No. While the City is supportive of a health services facility within the Central Precinct, Health and education are state infrastructure. It would not be appropriate for this to receive offsets against local contributions.
Private and public transport			
Internal streets and lanes on the over station development	As per Central Precinct Design Guideline	TfNSW	No. This is enabling development and should be provided as part of the development.
Access road from Cleveland Street to over station development	Provision of an access road	City of Sydney	No. This is enabling development and should be provided as part of the development.
Upgrade of Lee Street	Reprioritising road space on Lee Street to provide additional space for pedestrians.	City of Sydney or TfNSW	No. If the development is generating the need for upgrades to Lee Street, this should be provided as part of the development. The City reserves the right to make additional comments when complete transport modelling is provided.
Upgrades to intersections	Improve pedestrian capacity: - across the intersection of Pitt Street and Eddy Ave - along and across Eddy Ave - across the intersection of Elizabeth Street and Foveaux Street	City of Sydney or TfNSW	No. If the development is generating the need for intersection upgrades to manage impacts, then these should be provided as part of the development. The City reserves the right to make additional comments

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Item	Description	Proposed potential ownership / management	Suitable for offset against local contributions?
	- across the intersection of Broadway and Harris Street		when complete transport modelling is provided.
Footpath widening	Widened footpaths along George Street, Eddy Avenue, Broadway, Pitt Street and Quay Streets through road space reallocation to support growing pedestrian movements.	City of Sydney or TfNSW	<p>The City may support footpath widening of City of Sydney land as local infrastructure (such as on Broadway) if the City deems it necessary.</p> <p>However, if footpath widening is required as a direct impact of the development, this should be provided as part of the development and there should not be an offset against local contributions.</p>
Road space reallocation	Reallocation of road space to accommodate both waiting passengers and moving pedestrians on Eddy Avenue and at Railway Square.	City of Sydney or TfNSW	No. Footpath widening required to accommodate waiting passengers would be the responsibility of Transport for NSW. It should be provided as part of the development.
Over rail bridges	<p>Three cross rail bridges from the OSD deck to:</p> <ul style="list-style-type: none"> - Northern over-rail bridge from OSD to Chalmers Street extended from Devonshire Street; - Central over-rail bridge from OSD to Prince Alfred Park; - Southern over rail bridge from OSD to Prince Alfred Park. 	TfNSW	No. This is enabling development and should be provided as part of the development.
Vertical transportation for the OSD	Vertical transportation points to provide connections between street, to concourse and OSD deck level	TfNSW	No. This is enabling development and should be provided as part of the development.
Active transport infrastructure	New separated cycleway along Regent Street	City of Sydney	Yes. This City supports the extension of the Regional Cycleway network, with the location to be resolved in consultation with the City.

Item	Description	Proposed potential ownership / management	Suitable for offset against local contributions?
Southern Gateway	Prince Alfred Park bridge loop	TfNSW	No. This is not an essential piece of infrastructure, and the main beneficiaries will be the worker and resident populations in Central Precinct.
Goods line extension	Goods line southern extension to Mortuary Station Garden	TfNSW and City of Sydney	No. This is a state government project. It would not be appropriate for this to receive offsets from local contributions.
Bike hubs	Publicly accessible end of trip facilities / bike hubs and east-west links on OSD	TfNSW	No. The City is supportive of bike hubs generally. However, as these will not be in City ownership, they would not be suitable for an offset against local contributions.

The City raises strong concerns that the proposal has little regard to the wider local infrastructure impacts and needs that will arise because of the significant scale of development proposed.

In the absence of TfNSW preparing a genuine local infrastructure schedule that has been developed in consultation with the City, the City has considered what local infrastructure may be needed to support the scale of development proposed within the Central Precinct. The City asserts that the following are priority items of true local infrastructure suitable for inclusion on a local infrastructure schedule:

- **Prince Alfred Park and associated recreational facilities - capacity improvements:** Given Central Precinct directly adjoins Prince Alfred Park, its new worker, visitor and resident populations are highly likely to use the open space and existing outdoor tennis/basketball courts to fulfil recreational needs. Local contributions funding will be critical to ensure that Prince Alfred Park and its facilities are able to meet additional user demand, however should not be relied on as the main public open space for the precinct.
- **Belmore Park upgrade:** Belmore Park is bound by Central Precinct on three sides, and will no doubt experience an increase in users as a result of development at Central. While the City's current contributions plan has already made provision for a park upgrade, additional work beyond that previously envisaged is likely to be needed to address capacity demands. Additional local contributions funding is critical to address increased demand and for the park's interface with Central Station.
- **Broadway public space:** Broadway's importance as an important thoroughfare will increase as a result of development at Central Precinct. Serving as the City's western gateway, it will be critical to ensure that Broadway can cope with the additional demands of commuters and pedestrians. Local contributions funding will be critical to transform and revitalise Broadway so that even under additional pressure it can serve as a safe environment for pedestrians and cyclists and accommodate greater volumes of efficient and reliable public transport.
- **Indoor or outdoor recreational facility (minimum of two courts):** The City is supportive of the provision two additional indoor or outdoor recreational courts which are currently proposed

to be located within the Central Precinct itself. However, for this to be considered local infrastructure, the City would require the stratum to be dedicated to the City, to ensure these new courts are kept as local infrastructure in perpetuity.

Noting the time scales envisaged for the development of the precinct, if the rezoning proposal proceeds the City considers that it would be appropriate for these items to be included in a future iteration of the Central Sydney local contributions plan.

The City's preference is for TfNSW to work collaboratively with the City to develop a local contributions schedule agreeable to both parties. If mutual agreement on a local contributions schedule is reached, and the rezoning proposal proceeds, it would be appropriate to include the identified items in the infrastructure schedule of the next iteration of the Central Sydney Development Contributions Plan. Only after infrastructure items have been included within a City contributions plan would the City be willing to consider contributions offsets for items in the schedule which are delivered as works-in-kind.

The City remains committed to continuing work with Transport for NSW to reach agreement on a suitable local infrastructure schedule.

Recommendation: A revised local infrastructure schedule should be developed in close consultation with the City. The schedule should include the priority items of local infrastructure identified by the City and more broadly consider infrastructure needs arising beyond the Precinct boundaries.

Community and cultural facilities

Section 15 of the Design Guide identifies objectives and guidance to ensure the delivery of high quality and resilient social infrastructure. Table 12 of Section 15 proposes a list of facilities that would form a community facilities network in the precinct.

Integrated multipurpose community facility

The City raises no objection to the provision of an integrated multipurpose community facility within the Precinct but does not consider that this would be suitable for any offset from payment of local contributions. We recommend a process to identify strategic opportunities and local needs for creative and cultural space in the precinct. For example, there are local art organisations who have expressed a need for studio and gallery facilities in the Central Precinct for their clients. There is market interest and state government support for an increase provision of performance venues in Central Sydney, prioritising mid-sized theatres and music venues.

Recommendation: Additional guidance provided in Section 15.1 of the Design Guide to create a process for identifying strategic opportunities and local needs for creative and cultural space in the precinct.

Recommendation: For 1,500 square metres of the 4,000 square metre facility to be set aside specifically for a creative space (which will act as an anchor to attract people), established in alignment with the City of Sydney Creative Spaces Design Guides.

Community and cultural space

The City raises no objection to the provision of community and cultural space within the Precinct but does not consider that it would be suitable for offsets from payment of local contributions. The purpose and proposed use of this space should be more clearly defined, with 'culture' being defined by the Aboriginal community. The creation and governance of such a space should be led by Aboriginal people or organisations.

Recommendation: Review and Amend Section 15 of the Design Guide to stipulate that the creation of an Aboriginal Cultural Space should be governed by an Aboriginal-led organisation and that 'culture' should be defined by the Aboriginal community.

Child-care facility

The City raises no objection to the provision of a child-care facility within the Precinct but does not consider that this would be suitable for any offset from payment of local contributions.

Health services hub

The City raises no objection to the provision of a health services hub within the Precinct but does not consider that this would be suitable for any offset from payment of local contributions. Health services facilities are state infrastructure or can be provided by the private sector.

Operation and management

Operation and management of community and cultural facilities is key, and objectives and guidance referring to these matters should be included in the Design Guide. In particular, large multi-purpose spaces with several different uses need clear operation and management models. Information regarding the location of such facilities is required, to understand their interaction with the surrounding communities of Haymarket, Ultimo, Chippendale, Surry Hills and Redfern. The provision of public wi-fi, wayfinding and signage should be included at this stage of the proposal.

Recommendation: More information is needed on the location of facilities within the Precinct, the makeup of facility space and type and operation.

Connecting with Country

The City of Sydney is supportive of the Connecting with Country approach to this project, and others across the LGA. This should be in alignment with the GANSW's draft Connecting with Country framework and principles in all stages of the project. In particular, noting the need for the project to deliver ongoing benefits for First Nations communities.

The proposed planning framework needs to be amended to provide more information on how Connecting with Country principles will be implemented and applied at Central throughout the lifecycles of development.

- Connecting with Country projects and principles should not be limited to the design of the public spaces.
- The Design Guide should be amended to address how the principles will be integrated from the initial concept design through development applications, construction, availability of space for Aboriginal communities and programs to care for country, activate spaces and involve communities in the place.
- More information is required on how the project will provide economic benefits to Aboriginal communities, through procurement, employment, enterprise, housing and spaces for cultural practice. In particular, if the precinct is to benefit from the use of Aboriginal cultural elements, such as language and art, then the benefits from their use must be shared with the Aboriginal community.
- More information is required on how the project can contribute benefits to Aboriginal-controlled organisations in the surrounding areas, including investment in programs, services and facilities.

Recommendation: More information and a stronger commitment is needed on how the proposal will deliver ongoing benefits for First Nations communities through the project lifecycle and the future use of the space.

Governance and Aboriginal engagement

Purposeful and co-ordinated engagement that is connected to outcomes and builds on previous conversations with community members is needed. Under the proposed Aboriginal Engagement Strategy separate engagement processes are proposed for each development application. With the many redevelopment proposals in the area, there is a danger that the local Indigenous people will be overburdened by the constant demand for engagement. If each development application requires a separate consultation process, this will lead to ineffective and disconnected engagement.

More information is required on how future Central Precinct proposals will 'close the loop' by sharing cultural knowledge and information collected through the Connecting with Country work with members of the local community.

A governance process should be established to ensure that Connecting with Country principles, and the perspectives and needs of First Nations people, are present and embedded throughout the lifecycle of the project from planning to operation. This may include a centralised or precinct-wide engagement approach that then avoids duplicated conversations but rather builds a respectful and informed relationship between Government and community.

Such a process offers an opportunity for TfNSW/TAHE to work with First Nations communities to develop a model for implementing Connecting with Country principles consistently across the full range of NSW Transport redevelopment projects.

Recommendation: Establish a governance process which demonstrates how Aboriginal people will have influence throughout the project lifecycle.

Recommendation: Amend the Aboriginal Engagement Strategy to establish a process for purposeful and coordinated engagement that is connected to outcomes and builds on previous conversations with community members.

More detailed comments include:

- Section 4.1 of the Design Guide, 'Connecting with Country strategy', Guidance 6. Development that provides for connecting with Country opportunities should adhere to Indigenous Cultural and Intellectual Property protocols, not merely recognise them.
- Section 4.2 of the Design Guide, 'Aboriginal engagement'. Engagement for separate development applications should not happen in isolation. Engagement should build on previous conversations with community members, be coordinated with other engagement, be connected to outcomes and 'close the loop' by sharing cultural knowledge and information collected.
- Section 4.3 of the Design Guide, 'Acknowledging and celebrating Aboriginal languages'. Additional guidance is required to ensure alignment with the City of Sydney's Naming Policy and the Aboriginal Naming Trust's guidance.
- Section 4.3 of the Design Guide, 'Acknowledging and celebrating Aboriginal languages'. Update the guidance to specify that the Gadigal language should be used as a priority over other Aboriginal languages.
- Section 4.5 of the Design Guide, 'Cultural infrastructure' should specify, 'culture as defined by the local Aboriginal community'.

Consulting with the community

The City acknowledges the consultation and engagement TfNSW/TAHE has conducted with staff and other key government agencies, but considers the approach taken with regards to local residents to be insufficient.

Precinct neighbours were identified as a key stakeholder in the Consultation Outcomes Report, and as such, select community groups were invited to three Key Stakeholder Workshops in 2021 and 2022 to seek input on their aspirations and concerns for the future of Central. However, the information provided at these workshops did not fully explain the scale of change that has been proposed by this rezoning. Local community members are understandably overwhelmed and concerned by the future vision for Central and the potential impact on the areas surrounding the precinct such as Chippendale and Redfern and want meaningful ways to engage with and influence the proposal. The almost 7,000 pages of technical documents that have been placed on public exhibition for review are a daunting prospect for local residents and business owners to understand how their neighbourhood will be affected by this proposal.

One of the concerns expressed by the community has been how they can engage as the project evolves. A proposal of the scale of Central Precinct deserves a community and engagement strategy to match the scale and complexity of the project. This could include setting up a community liaison group for continuity of involvement.

Recommendation: Engage proactively and meaningfully with local communities and business to reach a shared vision for Central Precinct to enable more meaningful engagement with the City and the community.

Space for 21st century jobs and economies

The City welcomes the principal ambition of the proposal to create a tech and innovation hub, helping to diversify Sydney's economy beyond the financial and professional services sectors, towards economies and jobs of the 21st century.

The City acknowledges the *Economic Productivity and Job Creation Study's* analysis which suggests the development of the Precinct would exceed demand, however the long-term nature of project makes this uncertain. In light of this uncertainty, there is need for a clear strategy and vision and a planning framework which can adapt to deliver the needs of future workplaces.

Proportion of education/tech floor space

Within the suggested land use mix of the 500,000+ square metres of floor space, less than 10 per cent (47,250 square metres) is provided for tech/education uses. By comparison, over half of the total floor space (approximately 269,500 square metres) is proposed to be commercial office space. This mix is inadequate to diversify the economy, instead offering more of the same standard office space. If the shared aspiration for an innovation hub is to be realised, this imbalance needs to be addressed, increasing the overall provision of space for tech/education.

Recommendation: Increase the proportion of tech/education subsidised space within the land use mix to at least 20 per cent of the total floor space, to reflect its primacy within the development.

Affordable workspace

Attractive affordable workspace is critical to innovation because it allows start-ups, businesses and other organisations to experiment and take risks without needing to focus as much on returns and profitability. In the Design Guide, Guidance 8.1(8) indicates that commercial developments 'are encouraged' to provide affordable employment floor space for innovation and technology start-ups and small and medium-sized enterprises. Like with affordable housing, the planning controls should include the requirement for affordable workspace. Affordable workspace should be defined, and operators (not-for-profits or social enterprises) should be identified to dedicate the space to in perpetuity, securing its long-term affordability.

Recommendation: Include in the planning controls a requirement for a minimum of 15 per cent of commercial space to be affordable, dedicated in perpetuity to an affordable workspace provider.

Creating space for innovation

The proposed masterplan has been derived from a principle of optimising premium grade commercial floorplates, illustrated in Figure 3. This results in too many towers, that are too close together at the expense of the public realm. It results in streets and open spaces that have poor sunlight and poor wind conditions, and connections from the surrounding streets and spaces that are narrow, steep and not legible.

The City does not support the optimisation of premium grade office space as the primary driver for the planning of this important precinct. If this precinct is to form a part of the city fabric, it must be designed around the placement of high-quality open spaces with good solar access, daylight and comfortable wind conditions. The location of buildings must be the result of the prioritisation of good open spaces, not the other way around.

The proposed envelopes for high grade commercial towers will not deliver the type of workspace required in the innovation precinct. The precinct will need to attract deep tech, innovation and start up uses, which will require flexible offices, prototyping workshops, laboratories, or clean rooms. The character and nature of innovation floor space is different to office space. The scheme should support diversity of organisations through diversity of building stock with maximum flexibility for adaptation built in. A review of precedent buildings which support innovation brings to light the following key characteristics:

- Larger floorplates, often set as a linear blocks or campus style buildings with a large atrium
- Larger floorplates could have the effect of requiring lower building heights
- Easy access for servicing
- Larger floor-to-floor heights
- Able to accommodate more significant ventilation systems

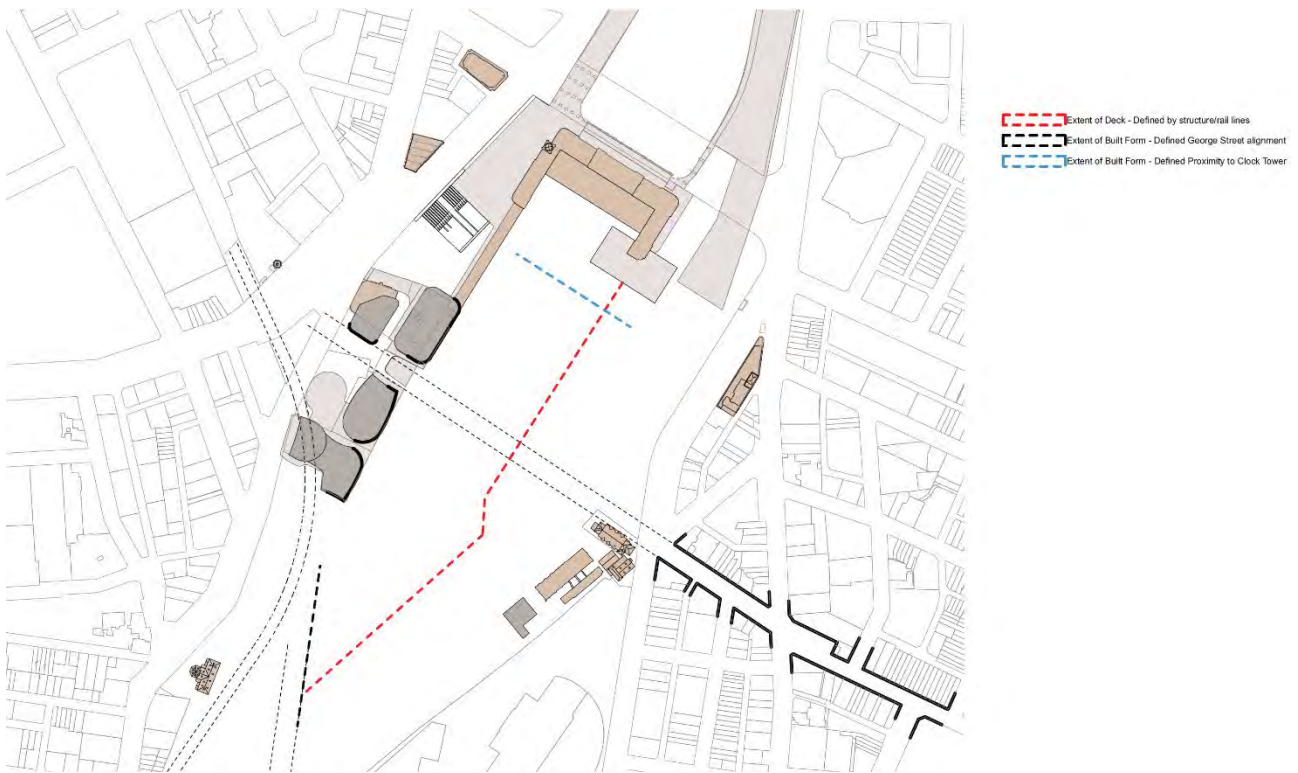
The proposed building envelopes support the construction of buildings with a podium and tower form, providing for standard high grade commercial space. The provision of standard office space in the precinct does not reflect the specific needs of the precinct for affordable, adaptable, and flexible workspace and should support diversity of organisations through diversity of building stock flexible and adaptable spaces.

Recommendation: The buildings envelopes should be updated to include a greater diversity of building types, to provide workspace, which is appropriate and adaptable for the innovation precinct.

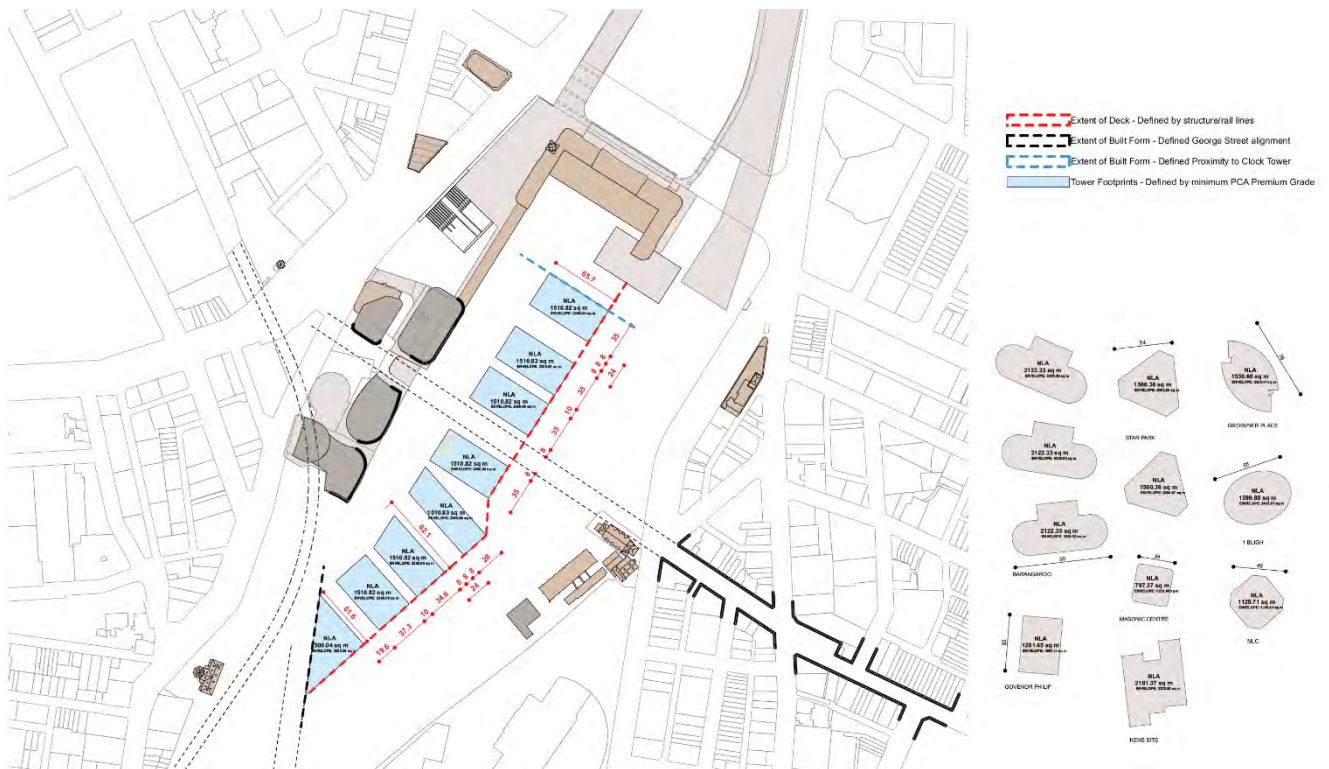
Figure 3. Analysis of how the masterplan has been derived

Source: City of Sydney analysis explaining the process undertaken for determining the placement and size buildings, driven by a primary aim of maximising premium grade commercial floor space.

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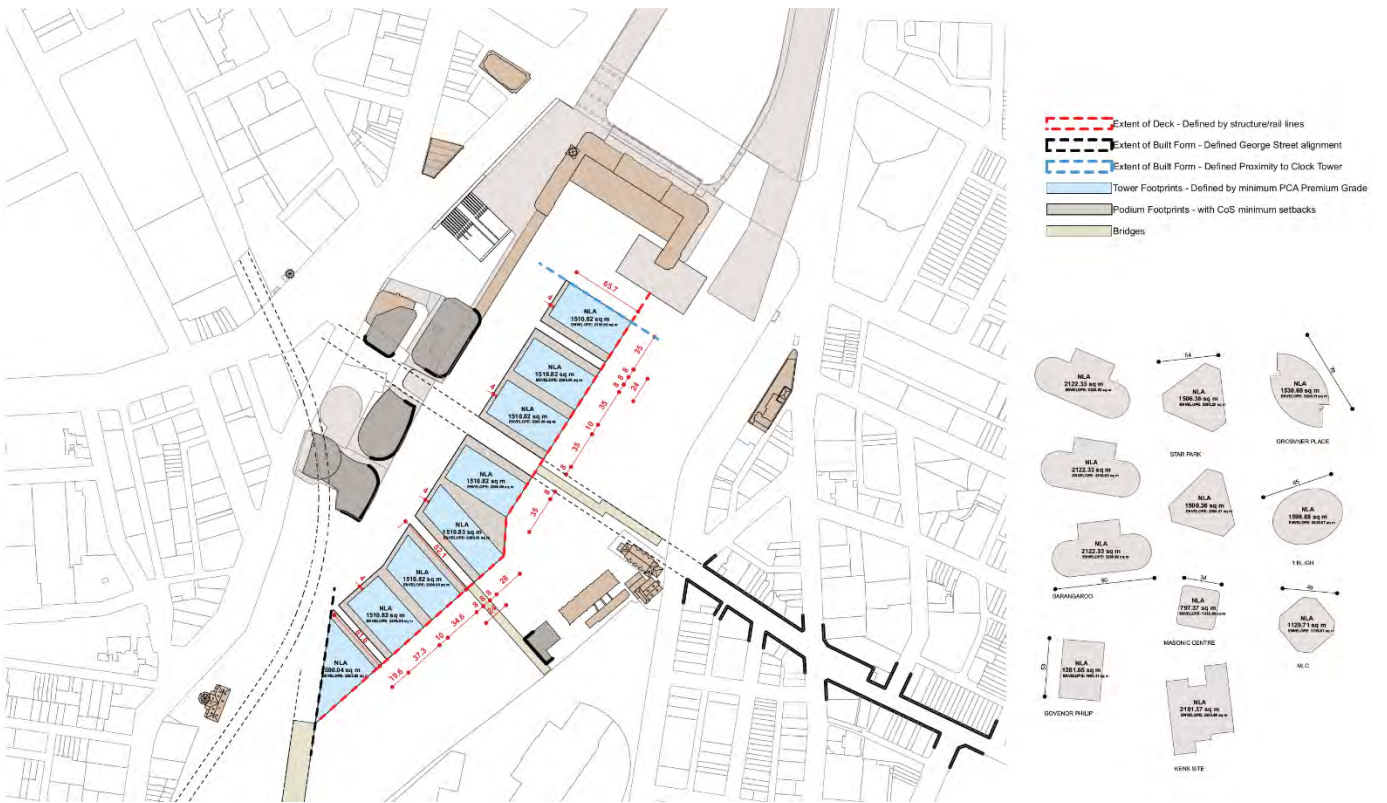


This diagram shows the extent of the deck, defined by the intercity train lines, the extent of building alignment to the north, defined by proximity to the clock tower, and the extent of building alignment to the south, defined by the continuation of the George Street (Redfern) alignment.

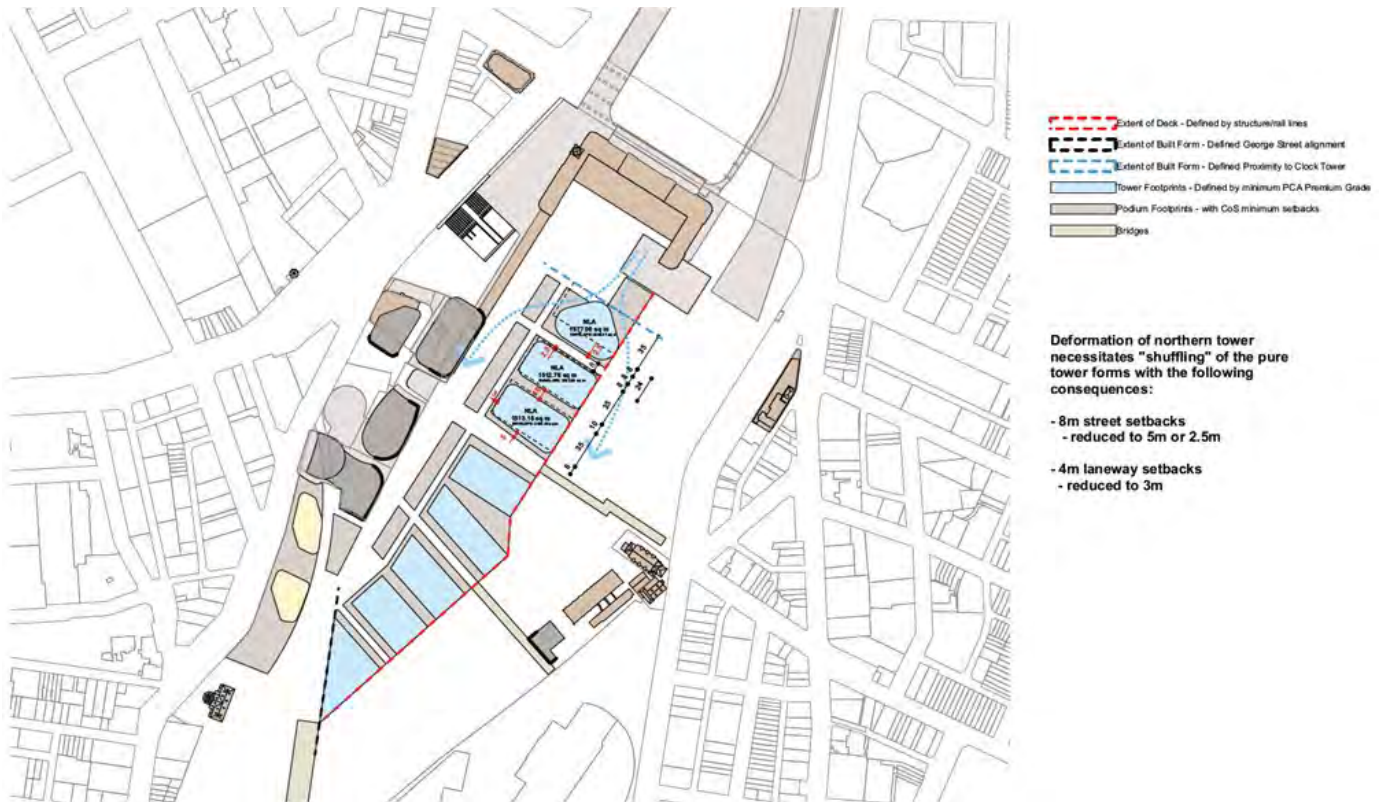


This diagram overlays the most tower footprints possible, ensuring that all, except the southern-most tower, meet the Property Council of Australia's Guidelines for premium grade office space for Net Lettable Space ($\geq 1500\text{sqm}$)

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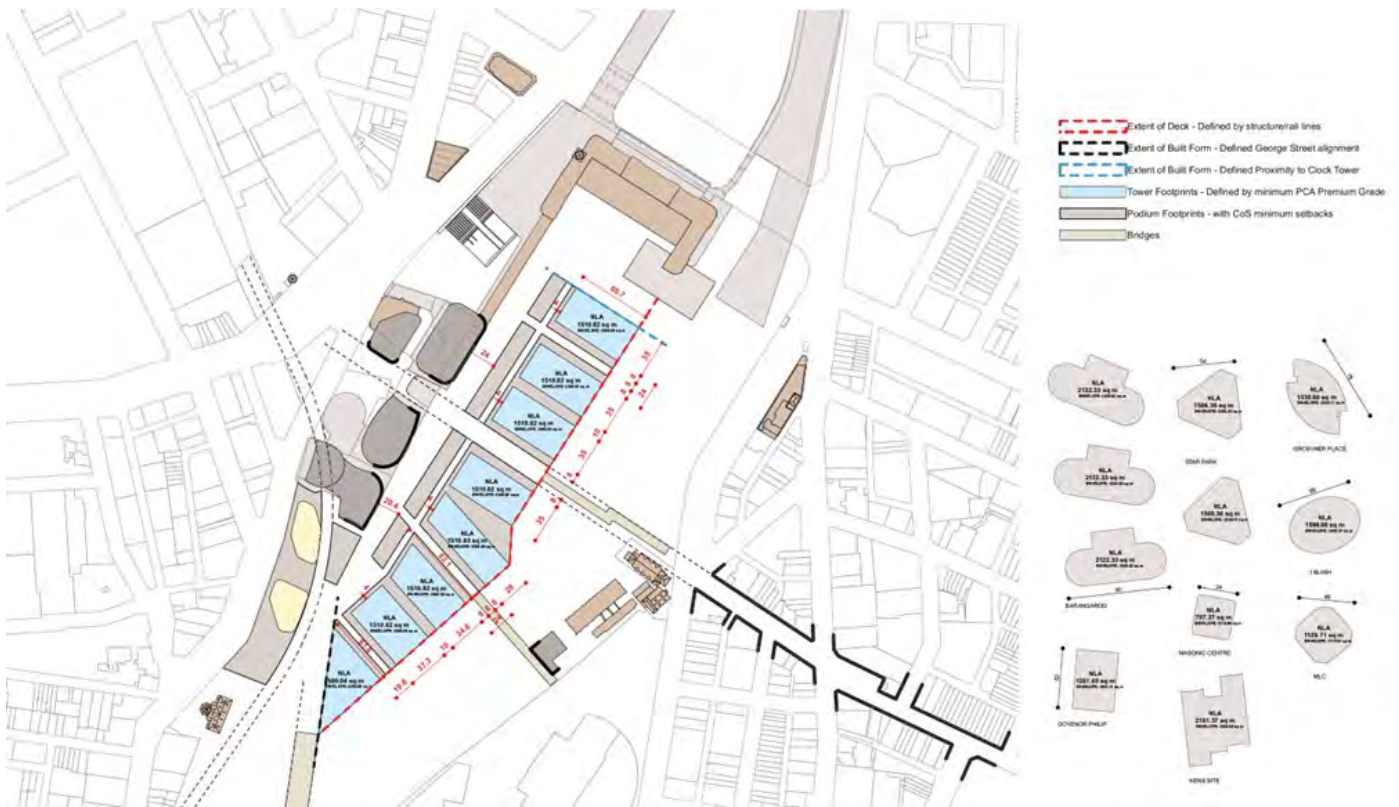


This diagram overlays the podiums beneath the towers. Upper-level setbacks of towers above podium height meet the minimum City of Sydney standards.

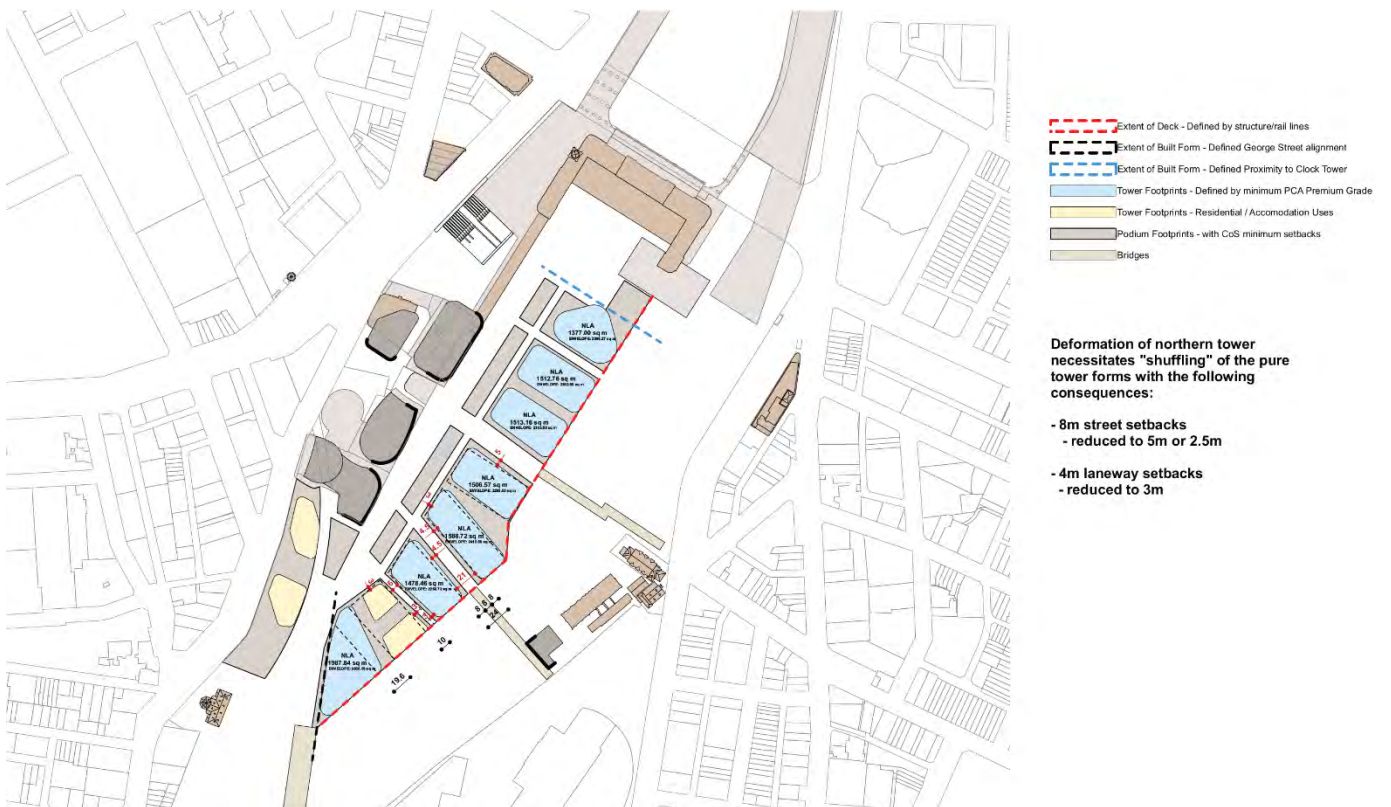


This diagram illustrates the curving of podium facades and the rotating of the northern tower to respond to wind issues. The deformation of the northern tower necessitates "shuffling" of the pure tower forms with the following consequences: 8m street setbacks are reduced to 5m or 2.5m and 4m laneway setbacks are reduced to 3m.

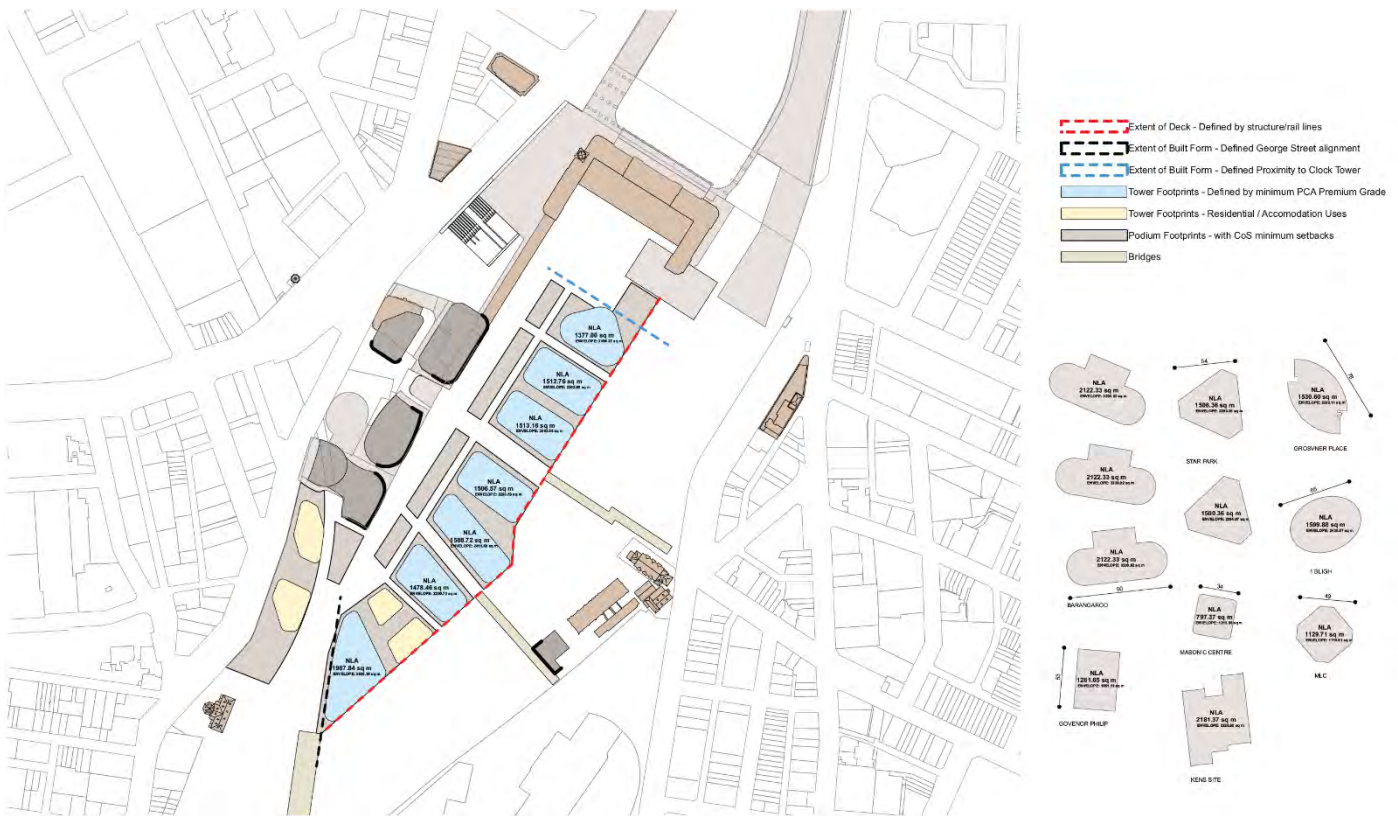
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This diagram overlays the 6-9 storey buildings to the eastern edge of Central Avenue.



This diagram illustrates how the deformation of the northern tower necessitates "shuffling" of the pure tower forms, and how it affects the southern towers with the following consequences: 8m street setbacks are reduced to 5m or 2.5m and 4m laneway setbacks are reduced to 3m.



This diagram illustrates the overlay of the steps shown above.

Excessive floor space and bulk

The City supports the aspiration of supporting jobs and business growth, providing new homes, and offering the cultural, creative and entertainment uses which bring a place to life, through the creation of floor space. This aspiration must be balanced with the need for high quality public space and amenity. The City reiterates its methodology for ensuring that the built form can be maximised without having undue impact on wind conditions, sunlight and sky view.

Excessive future building mass

The amount of floor space and density is excessive. The current reference scheme is overly bulky, with too many towers, too close together, resulting in significant visual impact, illustrated in Figure 6, and the deterioration of heritage item significance. Furthermore, the bulkiness of the built form has resulted in unacceptable wind conditions and lack of sunlight in public spaces.

Recommendation: Reduce the building bulk.

Building envelopes

The City notes that the street, block and building layout resembles the shortcomings at Barangaroo South, without the benefit of the foreshore promenade as shown in Figure 7. The majority of the proposal's active edges have been located with poor winter solar access. Building types are not suitable for entertainment, retail and cultural uses.

The City does not support the reduced upper level setbacks shown in the Design Guide. Building setbacks above street wall height must be determined by the appropriate amenity conditions in the adjacent public space, i.e., the wind comfort criteria, daylight and solar access benchmarks. It is noted that in the City, wind consultants have generally determined that a 6-8m setback above street wall height should be the minimum starting point. The Design Guide should set a minimum

control for 8m upper-level setbacks, with the opportunity for reduction in accordance with Schedule 12 of the Central Sydney DCP.

It is noted that the 3D model and CAD model supplied as part of the exhibition process are not building envelopes, rather a representation of the reference design possible within the building envelopes. This is misleading and is not a true representation of the scale of development possible under the proposed planning controls. In particular, the envelope for the Prince Alfred Park building is far larger than the reference scheme illustrated in Figure 5.

It is also noted that the building envelopes exhibited break the Sun Access Planes in several locations as shown in Figure 4. The building heights must be reduced, and the GFA re-calculated.

Figure 4. Exhibited reference design breaks the sun access plane

Source: City of Sydney analysis (TfNSW/TAHE reference design in red and proposed envelopes in blue)

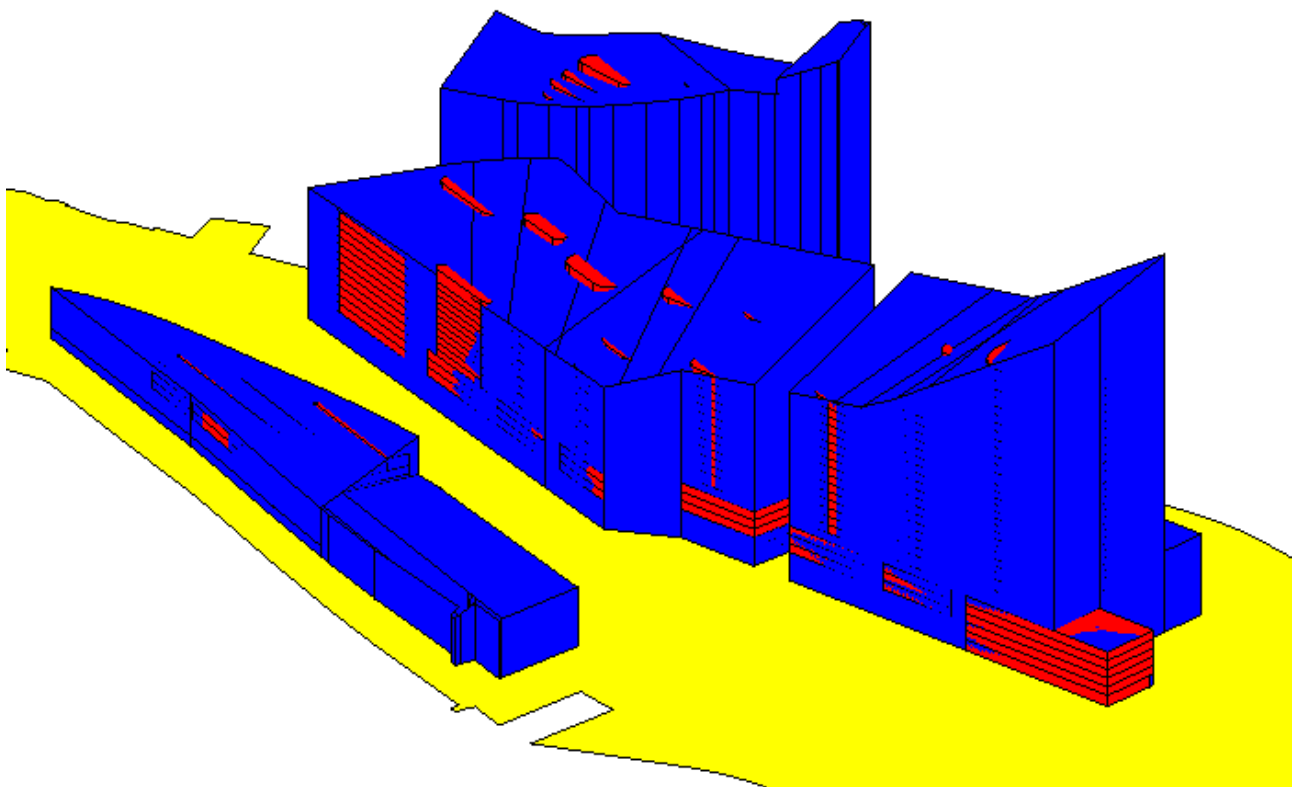


Figure 5. Proposed reference design

Source: Photograph, City of Sydney physical model, Town Hall House



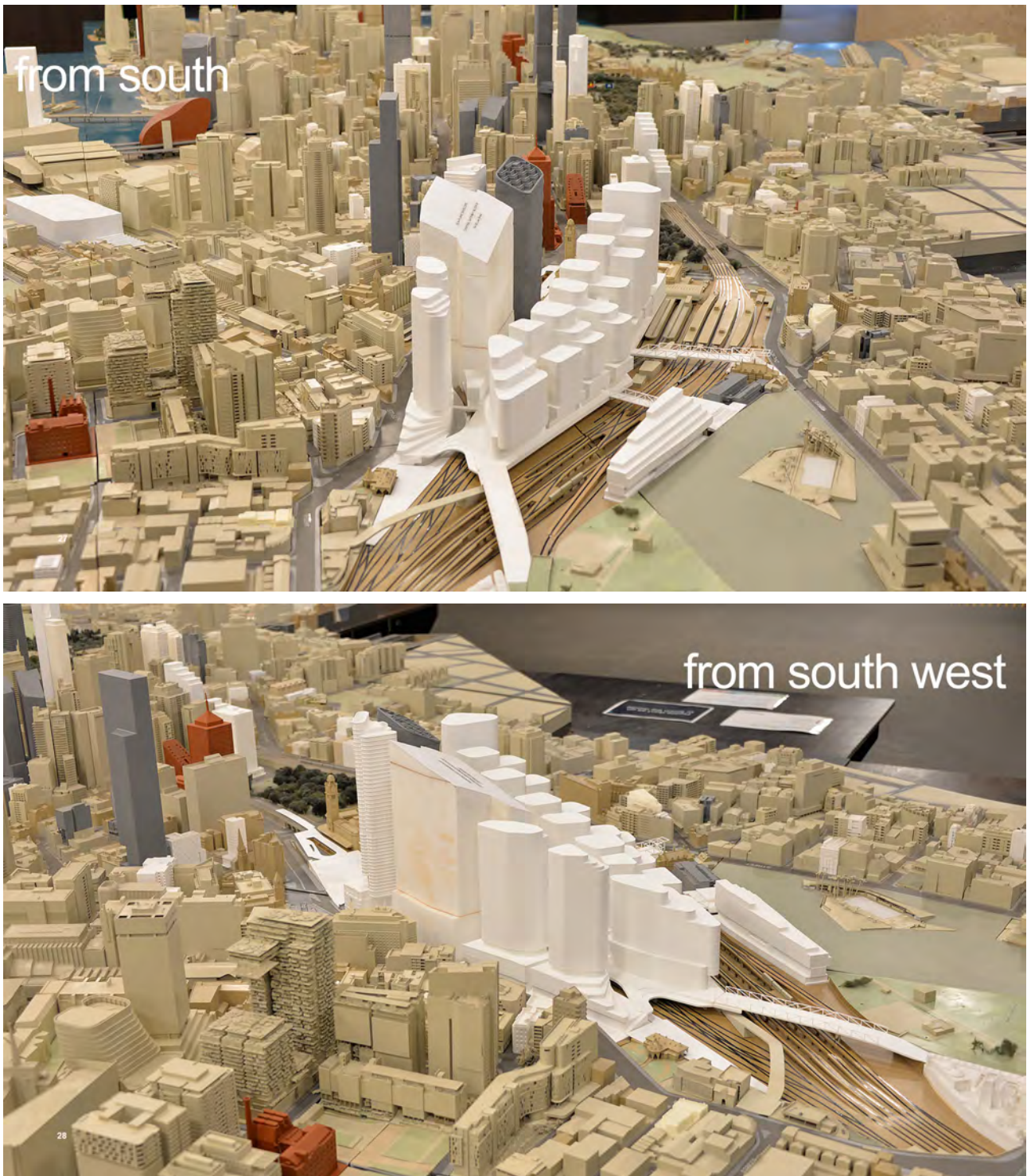
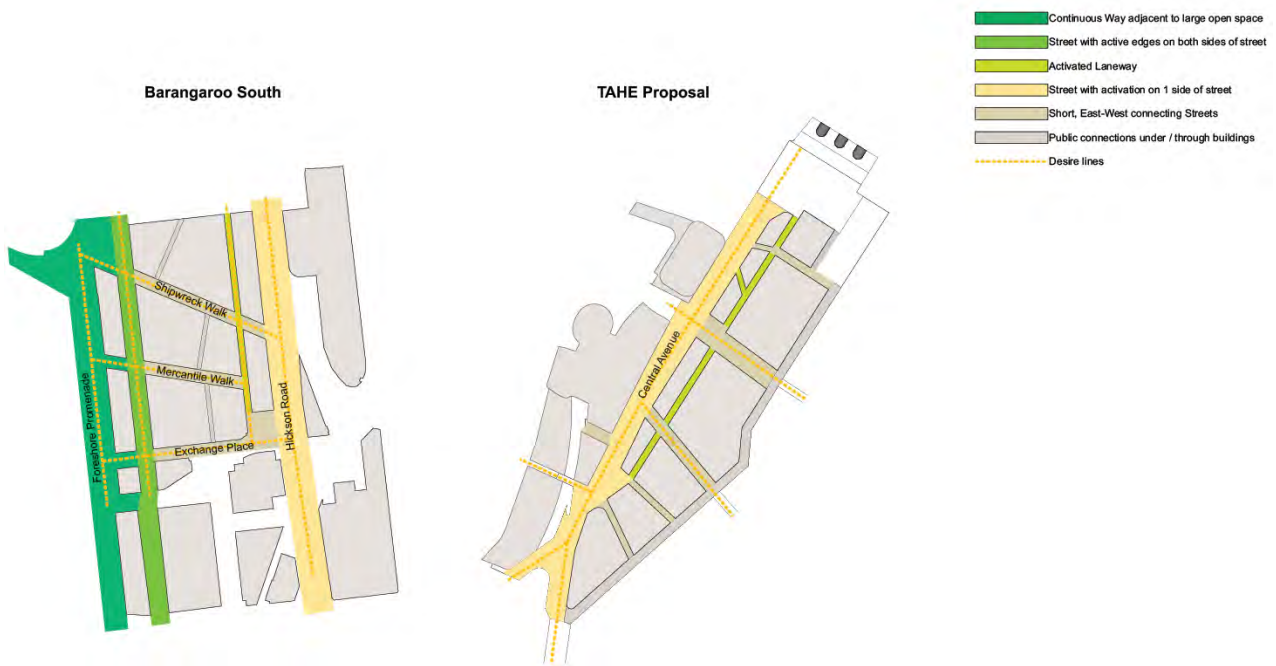


Figure 6. The blocks, streets and buildings resemble Barangaroo South

Source: City of Sydney analysis

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Barangaroo	Width	TfNSW/TAHE	Width
Hickson Road	30m	Central Avenue	15-24m
Shipwreck Walk, Mercantile Walk, Exchange Place		East-west connecting streets	
Publicly accessible links through T1, T2 and T3		Eastern colonnade	9m

Recommendation: Reconsider the street and public space structure and building envelopes from a first principles approach based on:

- better sunlight to public space on the OSD deck
- no unsafe wind areas in public spaces
- comfortable wind conditions for: sitting in all dwell spaces; walking (not business walking) in streets; and standing at building entrances
- more and better connections to surrounding streets and places that are legible and easy to navigate
- spaces that enable lively activity both day and night
- less buildings, further apart
- improvements to the main terminal access
- buildings are to be below the Sun Access Plane

Recommendation: Include a minimum control for 8m upper-level setbacks in the Design Guide, with the opportunity for reduction in accordance with Schedule 12 of the Central Sydney DCP.

Recommendation: Reduce the building heights under the Sun Access Plane.

Calculation of FSR and GFA

The City does not support the calculation of the GFA numbers in the exhibited documents.

1. There is no evidence that skyview and wind baseline standards have been met using the City's methodology for establishing a base case and
2. There are inaccuracies in the efficiencies applied to the GFA shown in the EIE and supporting studies.

Central Sydney Planning Strategy Base Case Methodology

The exhibited reference scheme has not proven it meets the equivalence metrics for sky view and wind, established by the Central Sydney Planning Strategy and in accordance with the methodology in Sydney DCP 2012 (DCP). This methodology is as follows:

1. Assume the proposed street and open space structure as per the exhibited scheme
2. Extrude the building envelopes, using the method outlined in the Central Sydney Development Control Plan for setbacks, this is the base case
3. Measure the sky view factor and wind impacts of the base case: this is the criteria that any modifications to the base case will be measured against
4. Demonstrate that the reference scheme maintains the minimum amenity standards set in 3 above
5. Calculate the GFA of the reference scheme to determine the FSR control, with correct application of the City's efficiencies

Meeting the metrics, through the above process, is essential for a safe, comfortable and inviting place and will likely result in reduced building envelopes and less GFA. This needs to be done prior to converting envelopes to GFA and FSR controls.

Correct calculation of the GFA of the reference scheme to inform the controls

The City's analysis has shown that, separate to the issues of wind and sky view factor baseline assumptions above, there are inaccuracies in the calculation of GFA in the exhibited scheme. The EIE allows 514,900sqm GFA in total, which is 449,900sqm GFA for Blocks A-E, excluding the Goulburn St carpark and the main terminal.

The City has applied the correct efficiencies and assumptions to each building's GFA figures as exhibited in the Urban Design Framework. The City's calculation shows that the envelopes for Blocks A-E can only accommodate a GFA 401,272sqm. **This analysis shows that the proposed GFA is not achievable.**

Figures 8 and 9 illustrate the methodology and the block-by-block calculation of GFA based on the correct application of the City's methodology.

This inflated GFA has then been used to calculate the FSR, which will determine the future density of the development, with implications for bulk and scale.

Once the envelopes and GFA are established through the City's methodology as described below, the GFA and associated FSR should be decreased by a further 10 per cent to enable an incentive for competitive design. This is discussed in the Design Excellence section below.

Figure 7. Calculation methodology used to measure the proposed envelopes using the City of Sydney methodology

Source: City of Sydney analysis

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Note: This measurement analysis assumes that the proposed envelopes have met all criteria / tests under Schedule 12 of the City of Sydney DCP - Procedure B for SVF/Daylight and Wind equivalency.

Step 01 Maximum Envelope	Step 02 Gross Envelope Area - GEA	Step 03 Gross Building Area - GBA	Step 04 Gross Floor Area - GFA																								
The envelope used (assuming it has met all equivalency tests under Schedule 12) has been supplied in the 24.08.2022 transmission of model.	The assumed compliant envelopes are divided into floor plates at nominated rates under Attachment G1. In this case the model transmission has already divided the envelopes into floor plates with the following departures from the City of Sydney G1 standard:	The GEA is multiplied down by an "Architectural Articulation" percentage defined in G1 based upon the height of the building: A minimum proportion of the entire design envelope for architectural articulation and external façade depth and external sun shading (not occupied by floor space) of 8.0% plus 0.5% for each 10metres in height above 120m up to a maximum value to 16% articulation. Note: the proportion (percentage) is established according to the maximum building height, this proportion is then applied to the whole envelope.	The GBA is multiplied down by an efficiency ratio based on removing the elements of the Core that do not count as GFA. As outlined in Attachment G1 the City of Sydney requires: Minimum 16% floor space exclusions associated with the core Due to the mixed use nature of the buildings																								
	<table border="1"> <thead> <tr> <th>Use</th> <th>G1 - Standard</th> <th>TAHE Model</th> </tr> </thead> <tbody> <tr> <td>Ground Floor / Retail / Lobby</td> <td>5.0m</td> <td>5.0m</td> </tr> <tr> <td>First Floor</td> <td>5.0m</td> <td>4.0m</td> </tr> <tr> <td>Commercial Tower</td> <td>3.8m</td> <td>3.6m</td> </tr> <tr> <td>Commercial Podium</td> <td>3.6m</td> <td>4.0m</td> </tr> <tr> <td>Hotel</td> <td>3.3m</td> <td>3.1m</td> </tr> <tr> <td>Plant</td> <td>6.0m</td> <td>5.5m</td> </tr> <tr> <td>Residential</td> <td>*3.2m</td> <td>3.1m</td> </tr> </tbody> </table> <p>For the purpose of this study the the TAHE floor to floor heights and Floor Uses were taken directly from the model as received. No testing has been carried out to determine if the TAHE departures were rectified - if the envelope model would further breach the SAP.</p> <p>Note: * Defines ADG best practice to achieve required ceiling height + DBP Act waterproofing standards</p>	Use	G1 - Standard	TAHE Model	Ground Floor / Retail / Lobby	5.0m	5.0m	First Floor	5.0m	4.0m	Commercial Tower	3.8m	3.6m	Commercial Podium	3.6m	4.0m	Hotel	3.3m	3.1m	Plant	6.0m	5.5m	Residential	*3.2m	3.1m	<ul style="list-style-type: none"> • 120 metres – 8% • 160 metres – 10% • 200 metres – 12% • 240 metres – 14% • 280 metres – 16% 	
Use	G1 - Standard	TAHE Model																									
Ground Floor / Retail / Lobby	5.0m	5.0m																									
First Floor	5.0m	4.0m																									
Commercial Tower	3.8m	3.6m																									
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Hotel	3.3m	3.1m																									
Plant	6.0m	5.5m																									
Residential	*3.2m	3.1m																									

Figure 8. Analysis of the TfNSW/TAHE GFA shows total of 401,272sqm is achievable within exhibited envelopes, not 449,900sqm (excluding Goulburn St carpark and Main Terminal)

Source: City of Sydney analysis

OSD Block A

	GROSS ENVELOPE AREA GEA	EFFICIENCY GEA-GBA	GROSS BUILDING AREA GBA	EFFICIENCY GBA-GFA	GROSS FLOOR AREA GFA
Commercial	126,867 sqm	90.00%	114,180 sqm	84.00%	95,912 sqm
Retail	10,225 sqm	90.00%	9,203 sqm	75.00%	6,902 sqm
Hotel	55,116 sqm	90.00%	49,604 sqm	84.00%	41,668 sqm
Student Accom	0 sqm	90.00%	0 sqm	75.00%	0 sqm
Residential	0 sqm	90.00%	0 sqm	75.00%	0 sqm
Cultural / Sports	4,327 sqm	90.00%	3,894 sqm	75.00%	2,921 sqm
Education	0 sqm	90.00%	0 sqm	84.00%	0 sqm
Transport	0 sqm	90.00%	0 sqm	0.00%	0 sqm
Plant	9,677 sqm	90.00%	8,710 sqm	0.00%	0 sqm
Plant - Central	8,012 sqm	90.00%	7,211 sqm	0.00%	0 sqm
Totals	214,225 sqm		192,802 sqm		147,402 sqm
				TAHE UDF	165,400 sqm
				Difference	-17,998 sqm
					-10.88%



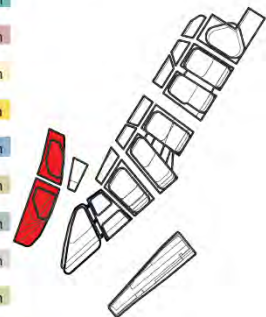
OSD Block B

	GROSS ENVELOPE AREA GEA	EFFICIENCY GEA-GBA	GROSS BUILDING AREA GBA	EFFICIENCY GBA-GFA	GROSS FLOOR AREA GFA
Commercial	88,876 sqm	92.00%	81,765 sqm	84.00%	68,883 sqm
Retail	6,507 sqm	92.00%	5,986 sqm	75.00%	4,490 sqm
Hotel	4,188 sqm	92.00%	3,853 sqm	84.00%	3,236 sqm
Student Accom	5,084 sqm	92.00%	4,677 sqm	75.00%	3,508 sqm
Residential	0 sqm	92.00%	0 sqm	75.00%	0 sqm
Cultural / Sports	0 sqm	92.00%	0 sqm	75.00%	0 sqm
Education	0 sqm	92.00%	0 sqm	84.00%	0 sqm
Transport	0 sqm	92.00%	0 sqm	0.00%	0 sqm
Plant	3,355 sqm	92.00%	3,087 sqm	0.00%	0 sqm
Plant - Central	7,160 sqm	92.00%	6,587 sqm	0.00%	0 sqm
Totals	115,169 sqm		105,955 sqm		79,917 sqm
				TAHE UDF	88,900 sqm
				Difference	-8,983 sqm
					-10.10%



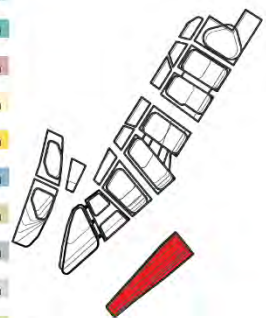
OSD Block D

	GROSS ENVELOPE AREA GEA	EFFICIENCY GEA-GBA	GROSS BUILDING AREA GBA	EFFICIENCY GBA-GFA	GROSS FLOOR AREA GFA
Commercial	18,255 sqm	91.00%	16,612 sqm	84.00%	13,954 sqm
Retail	0 sqm	91.00%	0 sqm	75.00%	0 sqm
Hotel	0 sqm	91.00%	0 sqm	84.00%	0 sqm
Student Accom	0 sqm	91.00%	0 sqm	75.00%	0 sqm
Residential	65,475 sqm	91.00%	59,583 sqm	75.00%	44,687 sqm
Cultural / Sports	0 sqm	91.00%	0 sqm	75.00%	0 sqm
Education	0 sqm	91.00%	0 sqm	84.00%	0 sqm
Transport	10,565 sqm	91.00%	9,614 sqm	0.00%	0 sqm
Plant	3,345 sqm	91.00%	3,044 sqm	0.00%	0 sqm
Plant - Central	0 sqm	91.00%	0 sqm	0.00%	0 sqm
Totals	97,639 sqm		88,852 sqm		58,641 sqm
				TAHE UDF	65,000 sqm
				Difference	-6,359 sqm
					-9.78%



OSD Block E

	GROSS ENVELOPE AREA GEA	EFFICIENCY GEA-GBA	GROSS BUILDING AREA GBA	EFFICIENCY GBA-GFA	GROSS FLOOR AREA GFA
Commercial	24,616 sqm	92.00%	22,646 sqm	84.00%	19,023 sqm
Retail	0 sqm	92.00%	0 sqm	75.00%	0 sqm
Hotel	0 sqm	92.00%	0 sqm	84.00%	0 sqm
Student Accom	0 sqm	92.00%	0 sqm	75.00%	0 sqm
Residential	0 sqm	92.00%	0 sqm	75.00%	0 sqm
Cultural / Sports	0 sqm	92.00%	0 sqm	75.00%	0 sqm
Education	0 sqm	92.00%	0 sqm	84.00%	0 sqm
Transport	0 sqm	92.00%	0 sqm	0.00%	0 sqm
Plant	4,643 sqm	92.00%	4,271 sqm	0.00%	0 sqm
Plant - Central	0 sqm	92.00%	0 sqm	0.00%	0 sqm
Totals	29,258 sqm		26,918 sqm		19,023 sqm
				TAHE UDF	20,900 sqm
				Difference	-1,877 sqm
					-8.98%



Recommendation: Determine the base case wind and sky view factor controls for the area, using the City's methodology established in the Central Sydney Planning Strategy and Sydney DCP 2012. Use this base case to inform the minimum wind and SVF conditions acceptable for development.

Recommendation: Measure the GFA and FSR correctly, using the City's assumptions and methodology.

Recommendation: Once the GFA and FSR have been calculated correctly, further reduce the FSR by 10% to enable design excellence.

Housing for all is needed here

The proposals include approximately 84,900 square metres of residential GFA, equivalent to approximately 850 homes, 15 per cent of which are to be provided as affordable housing. The City acknowledges this improved commitment to providing affordable housing.

Affordable housing

The Greater Cities Commission's Camperdown-Ultimo Collaboration Area Place Strategy stressed the need for affordable housing for the community, students, creative workers and key workers (particularly in the health and education sectors) to support the aspirations for the innovation area. Affordable housing is also needed to realise the NSW Government's target for 25,000 new students in the areas of STEM and life sciences in the precinct.

The proposal does not meet the City's target for a minimum of 25 per cent affordable rental housing in perpetuity on a State Significant Site in accordance with Priority L3 of the City's Local Strategic Planning Statement. Currently, the proposal is for 15 per cent affordable (including social) housing which should be further increased by 10 per cent due to the location and nature of the proposed uses. In order to ensure long term affordability, the planning framework should also stipulate that the affordable housing is dedicated in perpetuity to a Community Housing Provider.

In addition, the planning framework should include a requirement for 15 per cent diverse housing for student housing, aging in place, accessible housing, co-living and mixed tenure housing to accommodate creative/live work opportunities. Build-to-Rent is generally a premium market product with rents that normally exceed market rents and therefore should not be included within the diverse housing.

The affordable housing should be the subject of a planning agreement to deliver housing on-site, or otherwise a contribution should be paid in accordance with the City of Sydney affordable housing program.

Recommendation: Include in the planning controls a requirement for at least 25 per cent on site affordable rental housing and in addition 15 per cent diverse housing for student housing, co-living, aging in the place, accessible and mixed tenure housing (preferably excluding Build-to-Rent if it is at a market rent premium) to accommodate a diversity of people. The planning framework should also stipulate that the affordable housing is dedicated in perpetuity to a Community Housing Provider.

Absence of provision for Aboriginal Housing

The proposal for NSW Government-led housing development on Gadigal land in the Aboriginal Redfern area do not include a commitment to provide for a minimum of 10 per cent of the total residential GFA for culturally appropriate Aboriginal and Torres Strait Islander affordable housing to prevent their displacement from the area. The absence of this commitment is inconsistent with the objectives of applying Connecting with Country principles for the Central Precinct. It is not sufficient or appropriate for the provision of housing to be addressed in the future tenanting of residential buildings on the site, because this provides no certainty to the City or its community that this will be provided in individual development proposals.

The design guide is to address the provision of Aboriginal housing, similar to the Design Guides prepared for NSW Government sites at Waterloo Estate (South) and 600-660 Elizabeth Street, Redfern. Firm commitments and implementation plans must be established alongside the planning controls and the affordable housing requirement for the entire site.

Recommendation: Firm commitments and implementation plans for the provision of at least 10 per cent of the affordable housing provision for culturally appropriate Aboriginal and Torres Strait Islander affordable housing must be established alongside the planning controls and the affordable housing requirement for the entire site.

It is not illegal to be homeless in NSW

As the first point of arrival to the city for many people, Central Station has a strong historical and ongoing relevance for people sleeping rough and holds cultural significance for our First Nation rough sleepers. The proposal does not mention homeless people or rough sleepers, nor how the public space will be managed. The City would advise that the design and management of the Central precinct considers these factors, including the NSW Protocol for Homelessness People in Public Spaces (NSW 2022) and that the needs and rights of rough sleepers are considered in the design and ongoing management in construction and occupation phases.

Recommendation: Respect the rights and needs of rough sleepers in the design, service provision and management of the Precinct, referring to the NSW Protocol for Homelessness People in Public Spaces (NSW 2022).

Housing near rail infrastructure

The inclusion of residential uses on the OSD deck has the potential to create poor quality living environments given the noise and vibration from the rail lines below. The inclusion of residential uses may also conflict with ambitions for a 24-hour precinct.

The NSW Government's document 'Development Near Rail Corridors and Busy Roads Interim Guidelines 2008' provides clear strategic planning advice:

As part of taking a strategic planning approach, noise and air quality issues should be considered at the strategic level to avoid or minimise the need to address them at the site-specific stage. For example, site selection and consideration of site layout and urban form can assist in reducing adverse health impacts from motor vehicle emissions. Similarly considering traffic noise issues upfront at the site selection and design stage is essential for residential, hospitals, childcare centres, schools, places of worship and other sensitive development.

This advice is not referenced or discussed in any of the relevant documentation of the study. The opportunity at the strategic planning stage is to locate sensitive uses like residential development away from the noise source.

Recommendation: Consider *Development Near Rail Corridors and Busy Roads Interim Guidelines 2008* and set out how noise and vibration will be mitigated for sensitive uses like residential.

Section 8.1 of the Design Guide indicates that residential would be limited to the Regent Sidings Sub-Precinct, except for Built-to-Rent and Student Accommodation which may be provided on the in the southern OSD sub-precinct if several conditions are met. While the City is supportive in general of creating places with a rich mix of uses, strata ownership on the deck would pose a threat to the on-going governance and operations of the state significant infrastructure. While housing tenures such as build-to-rent may avoid strata ownership in the short term, there is no planning mechanism to prevent its conversion in the future. Therefore, in order to safeguard the future rail operations, all residential should be limited to the Regent Street Sidings.

Recommendation: Remove guidance point 8.1(4) from the Design Guide and limit all residential to the Regent Sidings Sub-Precinct, with no exceptions.

Quality public spaces around and affected by the development

The City recommends better consideration of improvements required to public spaces surrounding the development including Prince Alfred Park, Central Square (Railway Square), Broadway, St Paul's Place (Regent St and Cleveland St intersection), and Belmore Park. The following sections provide detailed commentary.

Central Square (Third Square)

A significant public place at Central has been on the City's agenda since Jan Gehl's work in 2007. Gehl identified an opportunity to create and connect significant city spaces at Circular Quay, Town Hall and Central Station along the George Street spine. The vision in Sustainable Sydney 2030-2050: Continuing the Vision is to unite the wider precinct with continuous tree canopies to create a green identity and improve amenity, strengthen connections between urban spaces, streets and Belmore Park and reinforce the precinct's green and urban characteristics.

The City understands that there is a need for open space to support the uses proposed on the OSD and broader community recreation needs. The Greater Cities Commission has specifically identified the need for outdoor social/ collaboration spaces to support the tech and innovation talent the precinct is aiming to attract.

The square, at grade with Pitt Street, will serve a different function, connected seamlessly into the network of city streets and neighbourhoods.

The Council endorsed a series of structuring principles in September 2020 which specifically identified the need to maximise the square adjacent to Pitt Street and Broadway to enable a flexible space suitable for activity 24 hours per day, while supporting the City's environmental objectives of being cool and green, and creating high-amenity spaces. Transport should continue to work closely with the City to progress the design of this important place.

The City has identified the demand for this activity, given Hyde Park and Martin Place are already at capacity, and Belmore Park and Prince Alfred Park are also already heavily used.

The City supports the inclusion of the Pitt Street component of Central Square as part of this rezoning and notes the following:

- Central Square must be considered as a whole with Railway Square and the upper square at the station entry, RL21 or thereabouts, providing an important future connection to Belmore Park
- The City does not support the provision of walkway link in the form illustrated, linking the main concourse at RL21 to the Atlassian building. This would detrimentally impact on the view of the heritage station building, encroach into the usable space of the square and result in unacceptably deep colonnades. The City's recommendation remains that leading people to city streets and spaces at grade is the priority, minimising the need for grade separation. The dog-leg at the southern end of the RL21 link, where it interfaces with Atlassian, only exacerbates the detrimental impact and must be reconfigured.
- Traffic on Lee Street must be reduced to a minimum with low speeds and connected only to the south.
- A contraflow bus lane on Regent Street (Broadway to Lee St) is needed to move bus stops to Broadway.

Submission to Central Precinct rezoning proposal

- The circulation and resting space in the lower square are not clearly defined and this will likely result in its primary function to be as circulation space.
- The allocation of space for the active movement of people could be consolidated.
- Preserving the area under the inclined section for future activation to the square is recommended instead of a water retention/reuse location.
- The City supports the provision of trees in the square, given the significant existing deep soil south of the Bondi Sewer, but recommends more tree planting. Civic spaces and iconic parks have a target of 50% canopy cover in the City's policy. Tree alignment should be revisited to better frame and organise open space sequencing. For example, tree planting could extend east to the entrance of Central Walk West (CWW).
- The shape and pattern of trees should frame and organise open space sequences and be informed by likely pedestrian movements. It is noted that the City's design illustrated in Sustainable Sydney 2030-2050 enables the double programming of circulation and activity space and enables a path of movement either through the trees or through the open space adjacent.
- It is unclear what the intention is for retention of the significant heritage stone wall adjacent to Pitt Street.
- The City supports upgrades to intersections identified in the proposed mitigation measures mechanisms
- The location of the pedestrian crossing at the intersection of Broadway, George, Pitt and Quay Streets requires input from a transport planner and should inform the layout of the trees.
- There is an opportunity for public art in Central Square to act not only as an urban marker, but also to reflect the spirit of the space and its broader context (Railway Square, and the intersection of Broadway, George, Lee, Pitt, and Quay streets) as nexus and urban crossroads at the southern end of the city centre and at the centre of the Tech Central initiative.
- Further investigation is required on the integration of The Goods Line into Railway Square, potentially open to the sky and with a vertical connection suitable for people of all abilities
- The Third Square (referred to as Central Square) includes the forecourt to the Station (TAHE land), Lee Street (TfNSW land) and Railway Square (City land). Given the dual occupancy, TfNSW/TAHE should consider this as a separate design excellence process, run jointly by TfNSW/TAHE and the City. It could be managed by the City or jointly managed with TfNSW/TAHE.
- The Design Guide for public space and open space should include the City's strategic plans/policies and codes, such as its Sydney Street Codes, furniture palette, standard public space technical details, Legible Sydney Design Manual, City Art Strategy and City Centre Public Art Plan to ensure consistency and continuity across the precinct's public space and its integration into the City's public space fabric.
- All planning for publicly accessible places should make reference to ensuring universal access.
- The City does not support the proposed Codes SEPP amendments to enable temporary events in the public space without the need to obtain a development consent (pp 65-66). The City will not be able to guarantee appropriate governance of public spaces, and it runs the risk of public space being colonised by businesses.
- There should be no vehicle access to the basement on Pitt Street

Recommendation: Revise the proposal including the following:

- Consider Central Square as a whole with Railway Square and the upper square at the station entry, RL21, providing an important future connection to Belmore Park

Submission to Central Precinct rezoning proposal

- Remove the terrace connection in the form illustrated, linking the main concourse at RL21 to the Atlassian building.
- Prioritise the movement of people at grade with the streets and not in tunnels or on bridges.
- Prioritise the leading of people to city streets and spaces at grade
- Reduce traffic on Lee Street to a minimum with low speeds and connected only to the south.
- Include a contraflow bus lane on Regent Street (Broadway to Lee St)
- Provide better definition of the circulation and resting space in the lower square are not clearly defined and this will likely result in its primary function to be as circulation space.
- Consolidate the allocation of space for the active movement of people
- Preserve the area under the inclined section for future activation to the square instead of a water retention/reuse location.
- Prove more trees in the Square in accordance with the City's policy
- Revisit tree alignment to better frame and organise open space sequencing. For example, tree planting could extend east to the entrance of Central Walk West (CWW).
- Consider the shape and pattern of trees to frame and organise open space sequences to be informed by likely pedestrian movements.
- Clarify the intention for the removal of the significant heritage stone wall adjacent to Pitt Street.
- Provide detail on the upgrade of the intersections identified in the proposed mitigation measures mechanisms including the location of the pedestrian crossing at the intersection of Broadway, George, Pitt and Quay Streets requires
- Use public art in Central Square to act not only as an urban marker, but also to reflect the spirit of the space and its broader context (Railway Square, and the intersection of Broadway, George, Lee, Pitt, and Quay streets) as nexus and urban crossroads at the southern end of the city centre and at the centre of the Tech Central initiative.
- Provide further detail on the integration of The Goods Line into Railway Square, potentially open to the sky and with a vertical connection suitable for people of all abilities
- Engage with the City on the design excellence strategies (precinct and place specific) for delivery of the square, given the dual ownership as: the forecourt to the Station (TAHE land), Lee Street (TfNSW land) and Railway Square (City land). Consider this as a separate design excellence process, run jointly by TfNSW/TAHE and the City. It could be managed by the City or jointly managed with TfNSW/TAHE.
- Include the City's strategic plans/ policies and codes in the Design Guide
- All planning for publicly accessible places should make reference to ensuring universal access.
- The City does not support the proposed Codes SEPP amendments to enable temporary events in the public space without the need to obtain a development consent (pp 65-66). The City will not be able to guarantee appropriate governance of public spaces, and it runs the risk of public space being colonised by businesses.
- There should be no vehicle access to the basement on Pitt Street

Interface with Prince Alfred Park

The City supports the principle of building adjacent to Prince Alfred Park with the following recommendations:

- The City does not support zero setback to the park above ground floor of the Prince Alfred Sidings building.
- A 3m setback and pedestrian path should be introduced between the Prince Alfred Park boundary and the Sidings building to provide an address, circulation to and from the building, resolve level differences, and appropriate separation to the active recreation facilities in the park.
- Ensure no impact from the upper level of the Prince Alfred Sidings on the existing trees in Prince Alfred Park.
- The City does not support the removal of existing sports courts in Prince Alfred Park. Consultation must be undertaken with the City in relation to this issue.
- The ground floor of the Prince Alfred Sidings building is disconnected from the park due to level changes. Consideration should be given to how the Prince Alfred Sidings building will present to Prince Alfred Park including the relationship of the colonnade to the park level, noting of the level change running north to south, the need to avoid stairs and retaining walls, the existing tennis courts and pedestrian paths.
- Consideration should be given to the character of the bridges over the railway tracks. It is noted that the origin and destination of these bridges are important, but the bridges are exposed to the elements and should provide activity with small footprint active uses, be safe and of high amenity. They should not be 100m long suspension bridges.
- Pedestrian modelling is required to support the bridge connections between the OSD and Prince Alfred Park, and to justify any modifications required to paths within the park.
- It is noted that TfNSW/TAHE confirmed that servicing to the Prince Alfred Sidings building will be from behind the Railway Institute building and no trenching would be required. Trenching of Prince Alfred Park for services between Cleveland Street and Chalmers Street is unacceptable.
- All planning for publicly accessible places must ensure universal access.
- Prince Alfred Park Sidings basement should have minimal parking and sufficient servicing spaces.
- The City notes that the envelope for the proposed Prince Alfred Park building is much larger than building form shown in the reference scheme. More clarity is needed about the proposed form.

Recommendation: Revise the proposal based on the above points.

Interface with the Main Terminal building

The City does not support the stairs connecting the OSD deck to the Main terminal at RL 21. The stairs are overstated and further darken the platforms. The City recommends redesigning this space to include a new public space for the station, open to the sky, between the platforms, the main hall and the new metro hall. The redesign must include strong visual connection between the intercity platforms and trains, and the main hall to retain the heritage significance of the place.

Figure 9. Connection between OSD deck and Main Terminal

Source: Adapted from TfNSW/TAHE exhibited technical documents 2022



Recommendation: Redesign the stairs from the main terminal to the OSD to preserve the heritage significance of the visual connection between the platforms and the main hall and include a new public space for the station open to the sky.

Mortuary Station Plaza

The City supports the revitalisation of the space around Mortuary Station with the following notes:

- access from the OSD to the Mortuary station Plaza is awkward
- there is insufficient sunlight for significant tree growth as shown in Figure 10
- the design must accommodate heritage trains into the future.

Figure 10. Sunlight to Mortuary Station Plaza

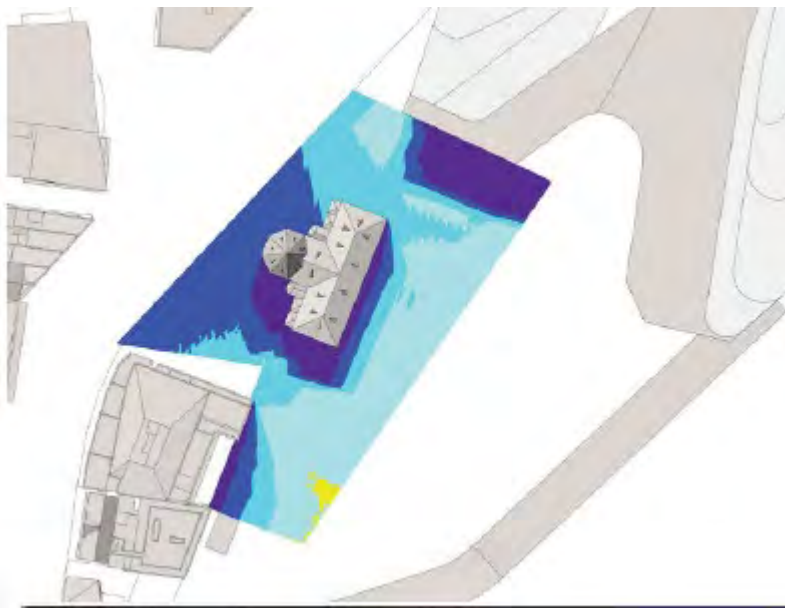
Source: City of Sydney analysis

Submission to Central Precinct rezoning proposal



Area sqm	0 hours	1 hour	2 hours	3 hours	4 hours	5 hours	6 hours	
4,196	111	103	409	441	966	1,023	1,144	
	2.65%	2.45%	9.74%	10.52%	23.02%	24.38%	27.25%	
							>4 hours: 74.64%	
							3132 sqm Of 4196 sqm	

74% of public space receives >4hours of sun at the Equinox (March/ September)



Area sqm	0 hours	1 hour	2 hours	3 hours	4 hours	5 hours	6 hours	
4,196	681	1,068	989	1,424	35	0	0	
	16.22%	25.45%	23.56%	33.93%	0.84%	0.00%	0.00%	
							>4 hours: 0.84%	
							35 sqm Of 4196 sqm	

0.84% of public space receives >4 hours of sun at the Solstice (June)

Recommendation: Revise the proposal for Mortuary Station Plaza to improve access, ensure sunlight for tree growth and accommodate heritage trains.

Overshadowing of neighbouring residential

The City is concerned with the overshadowing of residential uses adjacent to and affected by the proposed development as shown in Figure 11 below. This includes, in particular, the area of Chippendale bound by Regent, Meagher, Balfour and O'Connor Streets.

Figure 11. Overshadowing of adjacent residential uses

Source: Adapted from TfNSW/TAHE exhibited technical documents 2022



Overshadowing analysis

OSD Precinct

PROPOSED OVERSHADOWING

22 December - summer solstice

Within summer, the proposed development, including the planned Western Gateway development provide areas of shade and cooling to various areas of the public domain, particularly along Central Avenue, the north-south lane and east-west links. Within the primary areas of open space, generous canopy cover and planting is required to provide necessary cooling and comfortable places for people to dwell.



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Recommendation: Provide a detailed analysis of the impact of the proposed development on all affected adjacent properties as per SEPP65 ADG.

Recommendation: Consider improvements to St Paul's Place (Regent St and Cleveland St intersection).

Quality public spaces on the OSD deck

The City supports the intent of the development, to provide 15 per cent publicly accessible open space. The following issues need to be addressed to improve quality of the open space and ensure it is attractive and fit for purpose:

- New South Wales Premier's priority for Greener Public Spaces recognises that *quality green, open and public spaces are important to everyone*. The poor urban design of the Central Precinct SSP shows that the intent of the Premier's priority for greener public spaces is not met given the unacceptable wind environments, and streets and parks that receive insufficient sunlight.
- The City supports the aim of excluding any exhausts or emergency access egress within the public space on the OSD deck. The City understands that this may mean that only electric trains can be used under the deck. Further information is required on this issue once consultation has been undertaken with Sydney Trains and Heritage, including what intercity and heritage rail services will be impacted.
- It is unclear whether all the laneways (north south and east west) are open to the sky and truly public space.
- The Design Guide for public space and open space should include the City's strategic plans/policies and codes, such as its Sydney Street Codes, furniture palette, standard public domain

technical details, Legible Sydney Design Manual, City Art Strategy and City Centre Public Art Plan to ensure consistency and continuity across the precinct's public space and its integration into the City's public space fabric.

- All planning for publicly accessible places must ensure universal access.
- Vertical transportation from the tracks to the OSD deck must be located within built form and not in the public space.
- The City does not support the Codes SEPP proposed amendments to enable temporary events in the public space without the need to obtain a development consent (pp 65-66). If the Codes SEPP is the pathway, the City will be unable to guarantee appropriate governance of public spaces and run the risk of public space being colonised by businesses.

Recommendation: Revise the proposal based on the above points

Central Green

The City supports the provision of a green space on the OSD deck to serve the workers with planning control to ensure solar access is provided in accordance with the City's controls for public parks. The City recommends consideration of the following:

- the eastern and southern alignment of central green are poorly defined
- the park requires a street frontage to the south to separate ground floor uses from Central Green and provide for outdoor dining, building entry and the like.
- Enlarging the park to extend across the entire front of the main station by removing the building to the east of the Central Green.
- any overhang of towers fronting the park is unacceptable and must be removed.
- the planting scheme, 'evapotranspiration' appears unrealistic
- wind conditions are unacceptable for sitting in most of the space.

Figure 12. Alignment of Central Green

Source: City of Sydney analysis and TfNSW/TAHE exhibited technical documents 2022



Recommendation: Define the eastern and southern alignment of central green by:

- Providing a street frontage to the south
- Extending the park across the entire front of the main station by removing the building to the east
- Removing all overhanging towers fronting the park
- Ensuring wind conditions are acceptable for sitting for the majority of the space

Circulation and legibility

The City supports the key aims to reconnect Redfern to the City and Harbour, and to reconnect east and west. The proposed street layout does not achieve these aims and results in poor and convoluted access and circulation without destination or purpose.

Visual connection to the broader street network is critical to anchoring pedestrians in place. Without street vista continuity from the deck, separation created by the significant level change on the OSD deck will only be exacerbated.

Level changes from Regent Street up onto the OSD deck are significant, slope is steep and stair widths are mean which will result in poor inhospitable public space outcomes. These connections need significant design consideration and guidance including slope, width, landings etc.

There is only one clear connection through the proposal, aligned with Devonshire Street at the eastern end, and a very poor connection, wedged between the Atlassian and Dexus Frasers buildings in the Western Gateway to the west, requiring significant canopies to mitigate the dangerous wind conditions.

There is no clear connection from George Street Redfern to the western side of the development. At least one other new connection from George Street Redfern to Regent Street is required including a high-quality, regional cycling connection across the railway line between George Street (Redfern) and Lee Street and a connection for people cycling from the OSD deck to the Goods Line.

Cycle access is convoluted and unresolved. Confirmation is required as to the feasibility of using the Devonshire Street tunnel as a bike connection. All local streets on the OSD deck should be designed to accommodate people cycling.

The George St south bridge connection must be designed primarily for people walking and cycling. Basement design must incorporate secondary access for resilience.

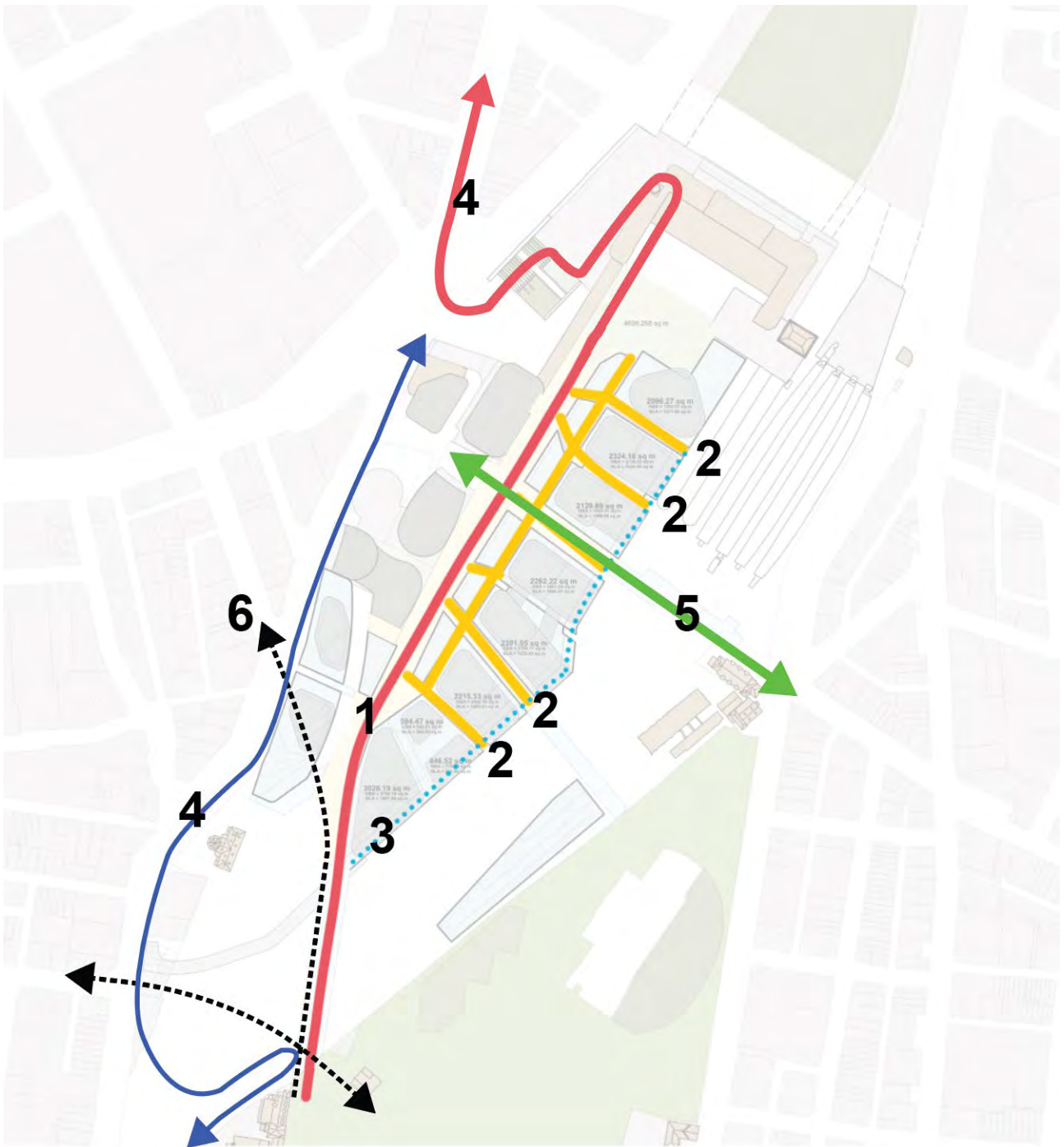
Central Avenue is described as 24 metres in width, but it is less for most of its length. It is too narrow and requires a three point turn for emergency vehicles. Issues with transport circulation are detailed further in the appendix of this submission.

The City recommends reconsideration of the following, illustrated in Figure 14 below:

- Central Ave is too narrow for all parts < 24m (1)
- The east-west streets and lanes lead to dead ends and the lanes are too narrow at 6m (2)
- The eastern arcade has very poor amenity (3)
- The proposed north-south connections are contorted and convoluted (4)
- There is only one clear connection across east west (5)
- At least one more connection is needed, located as per pedestrian movement demand modelling (6)

Figure 13. Poor and convoluted access

Source: City of Sydney analysis



Activation of streets

The City supports the principle of providing active ground floor frontages and the provision of spaces to enable activity day and night, however the majority of the streets are only activated on one side, including down the Central Avenue which will limit activation. The City also notes that the canopy and kiosks required to enable outdoor 'dwell' spaces along the streets, as well as level changes between public space and ground floor tenancies along the Eastern Colonnade will limit activation considerably.

Figure 14. One sided activation of the streets

Source: City of Sydney analysis



North-south laneway

The public domain strategy and urban design framework and planning report all identify Ash Street in the city centre as a good eat street precedent at 6m wide. A far better 'eat street' precedent is Kensington Street (8m wide). Pedestrians on Ash Street have to weave between outdoor dining areas on opposing sides of the street, whereas on Kensington Street, pedestrians have a comfortable clear path with meaningful outdoor dining areas on both sides of the street.

The City strongly recommends increasing the minimum width from 6m to 8m.

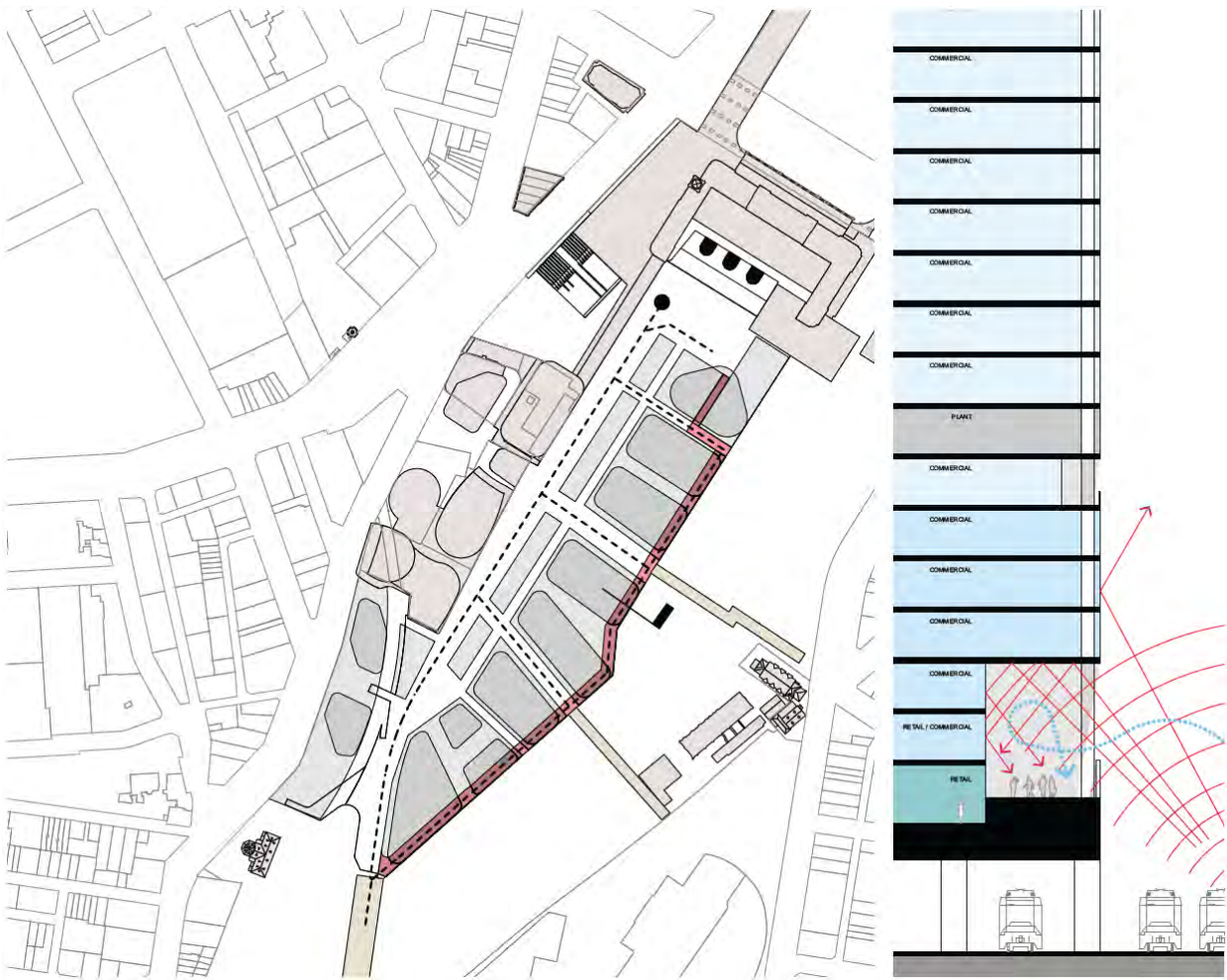
Eastern Colonnade

The City strongly recommends that the eastern colonnade be reconsidered as it:

- is fenced and is too narrow for the anticipated users – cyclists accessing hubs, vehicles as shown on diagrams and pedestrians.
- has potential to receive sunlight if open to the sky and shelter from winds
- is disconnected, it is not on any direct path through the precinct or to places within the precinct
- is a poor quality, undercroft space, with no activation, but in the best location for sun and comfortable wind conditions

Figure 15. Eastern colonnade

Source: City of Sydney analysis



Recommendation:

- Ensure Central Avenue be a consistent 24 metres width
- Reconsider the eastern colonnade to improve its poor amenity and take advantage of its location for sunlight and comfortable wind conditions
- Increase the north south lane to 8 metres
- Provide double sided activation to the majority of street frontages
- Ensure that active frontages are not restricted by barriers such as vertical screening and kiosks by improving the building form in relation to wind expert advice to eliminate the need for these cumbersome amelioration devices
- Improve the contorted north south access from George Street Redfern to the west and the north
- Improve vertical access from the OSD deck to the streets, making them wider and more legible
- Include at least one more connection from George Street Redfern to the west, located to address pedestrian desire lines and demand
- Confirm and commit to providing a high-quality, regional cycling connection across the railway line between George Street (Redfern) and Lee Street
- Ensure that people cycling can get from the deck to the Goods Line
- Confirm feasibility of using Devonshire Tunnel as a bike connection, and make it clear on the bike network map

- Design all local streets on the deck to accommodate people cycling
- Remove vehicle access to the basement on Pitt Street, access should be through the consolidated basement in the Western Gateway
- Ensure the Prince Alfred Park Sidings basement contains minimal parking and servicing spaces
- Ensure basement design incorporates secondary access for resilience
- Design the George St south bridge connection primarily for people walking and cycling

Sky View Factor

The City supports the proposal for provision of good daylight and sky view in the streets and open spaces on the OSD deck. The study as exhibited does not use the City's methodology to establish a base case with minimum targets for sky view, from which to assess the proposed scheme. This assessment must be undertaken to enable appropriate comparison of the proposal to the rest of the city.

Recommendation: Undertake a sky view assessment using the City's methodology in the Central Sydney Planning framework.

Sunlight to public places

Sunlight is critical in public spaces to provide good amenity to people and allow for good tree growth throughout the year. Trees assist in ameliorating climate change by absorbing carbon from the atmosphere. The changing climate is increasing with the number and temperature of hot days that would adversely affect people's health and wellbeing. Trees provide relief on hot days through, shade, heat absorption and transpiration.

To promote good growth for street trees, two hours of sunlight every day of the year that the sun shines is an accepted rule of thumb amongst horticulturists. The technical documentation does not include solar insolation, however the City's analysis shows that few, if any, streets will have the sunlight conditions required for good tree growth.

The City's analysis indicates

- only 20% of the streets will receive >2 hours of sun at the Summer Solstice
- only 41% of streets will receive >2 hours of sun at the Winter Equinox
- less than 40% of trees shown in the new public space will receive enough sunlight at the Equinox

The City does not consider it acceptable that less than half the public space has enough sunlight for tree growth.

To promote good grass growth in parks, four hours of sunlight every day of the year that the sun shines is an accepted rule of thumb amongst horticulturists. The City reinforces this with its minimum standards requiring at least 50% of the area of a park to receive 4 hours of sunlight at the winter solstice between 9am and 3pm. The 50% minimum acknowledges that some overshadowing is unavoidable, and the park design is formed around the varying sun access. Implicit in the minimum standard is that areas of the park will receive more than 4 hours of solar access, better than the minimum requirement. The City supports the provision of these solar standards in Central Green and at the Mortuary Station Plaza.

The City strongly implores that the precinct plan be redesigned to provide at least the minimum required amount of solar access in the winter solstice between 9am and 3pm as follows:

- 4 hours to at least 50% of Central Green
- 2 hours to at least 50% of the new streets to promote tree growth

- 2 hours to at least 50% of Mortuary Station Plaza to promote tree growth

Figure 16. Insufficient solar access

Source: City of Sydney analysis

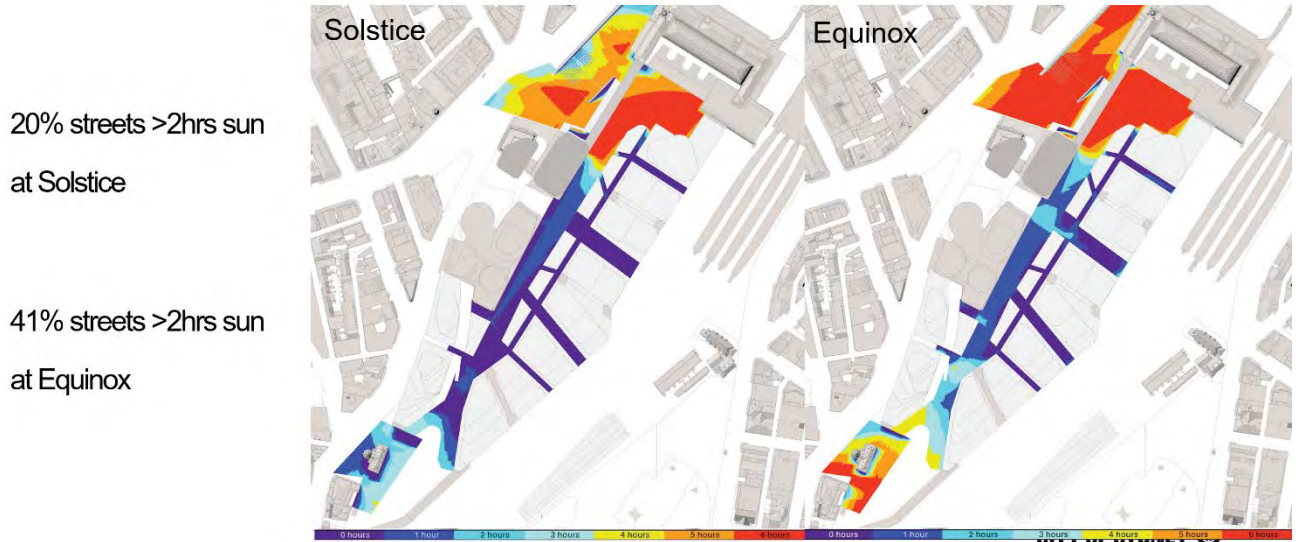
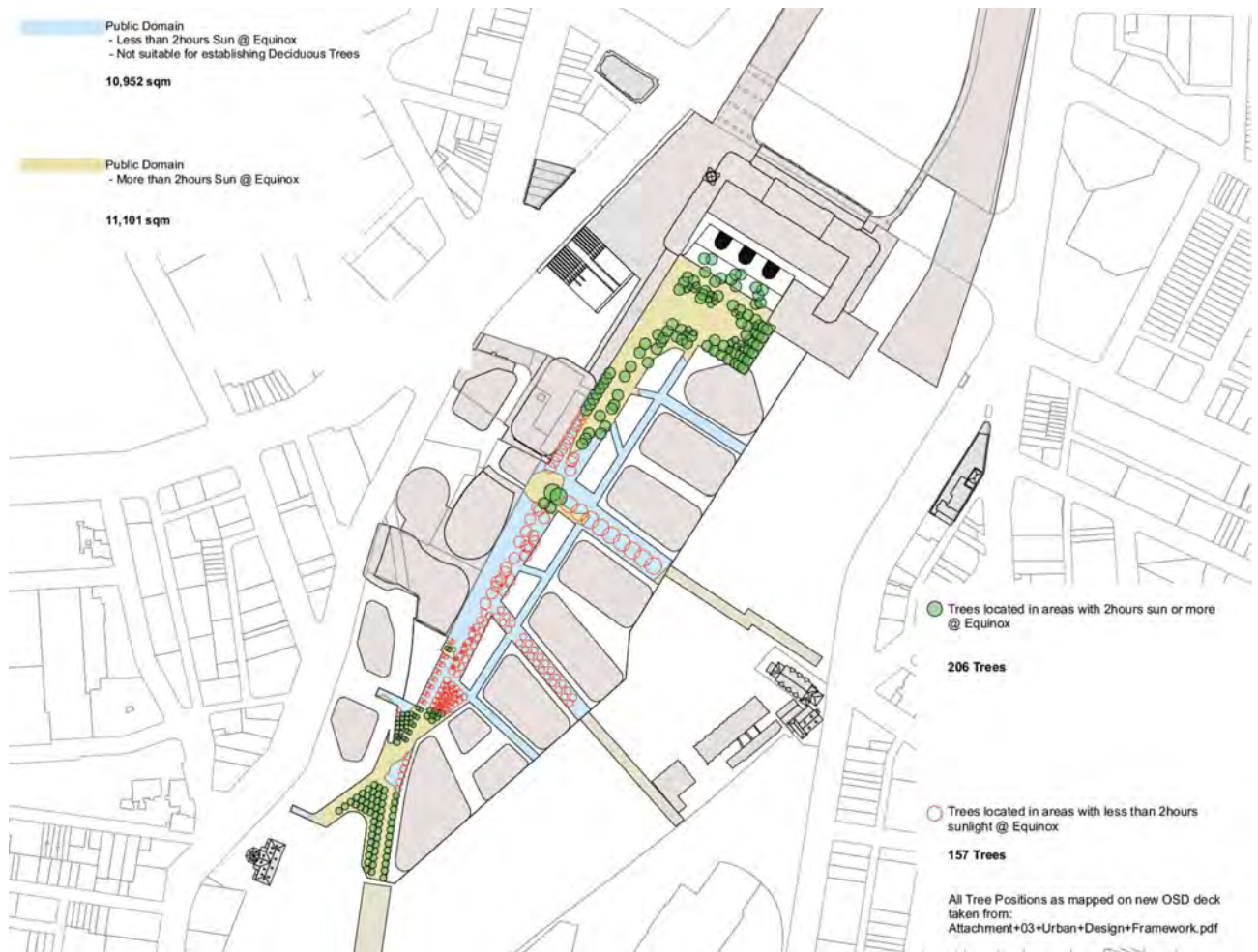


Figure 17. Less than half public space has enough sunlight for trees

Source: City of Sydney analysis

Submission to Central Precinct rezoning proposal



Recommendation: Redesign the streets and open spaces to provide at least the minimum required amount of solar access in the winter solstice between 9am and 3pm as follows:

- 4 hours to at least 50% of Central Green
- 2 hours to at least 50% of the new streets to promote tree growth
- 2 hours to at least 50% of Mortuary Station Plaza to promote tree growth

Ameliorating wind impacts

People's use and enjoyment of public open space requires safety and comfort. The site is exposed to strong winds, in particular, from the north-east and north-west and therefore, careful design of the built form to ensure safe and comfortable environments for people in public space is essential in the design of the masterplan.

It is clear that the built form is derived from a primary aim to maximise premium grade office space. The technical wind report includes evidence of design iterations with adjustments to the built form, made to ensure better wind safety and comfort than it initially produced. However, comfortable pedestrian wind environments are not provided in Central Green, Central Avenue and throughout. The consequences are clearly illustrated in the technical material.

The technical wind report indicates wind mitigation measures: "... to address the limited shielding provided by any surrounding buildings for the prevailing north-east, south and westerly winds." (p.158). Given the modelling shows safety and comfort issues, the City recommends reconsidering the mitigation advice shown on p.158 of the technical wind report:

Submission to Central Precinct rezoning proposal

- *Improve building shapes to reduce wind effects from the northeast and northwest wind directions by encouraging wind to move around the buildings rather than being directed to podium/ground level.*
- *Avoid large continuous building forms so wind can permeate through the development more freely, rather than being directed down to ground.*
- *Round and/or break-up podium corners to reduce local wind speed increases*

The Central Precinct Renewal Wind Analysis 15 July 2022 includes wind tunnel testing for the proposed development without comparison to the existing conditions. It also includes CFD modelling for the proposed development and the existing conditions. The wind tunnel testing results do not accord with the CFD modelling results. It is also noted that the wind analysis has not been undertaken using the methodology stipulated in the Study Requirements and the Sydney DCP. This makes it difficult to assess and compare the results to the rest of the city. These two factors result in mistrust of the wind engineering technical study.

The Central Precinct Renewal Wind Analysis 15 July 2022 highlights those parts of the SSP study area that fail the safety limit and most parts fail the comfort criterion for walking, standing or sitting prior to the addition of devices such as vertical screens. The areas designated in the Design Guide as being 'dwell spaces' do not have appropriate wind conditions including most of Central Green, the eastern side of Central Avenue, the Southern Plaza, Devonshire Link, north-south laneway and all east-west laneways.

The City does not support the requirement for canopies and enclosed kiosks to mitigate wind, as shown in the Design Guide. Wind mitigation devices should be encouraged to be well designed, rather than a dual use as an artwork.

The City strongly recommends that the Precinct Plan must be redesigned to eliminate unsafe and uncomfortable pedestrian wind environments by implementing good design practice.

The City recommends that the wording in the Design Guide, *Wind impacts... are not to be substantially worse than existing wind conditions*, should be replaced with: *Wind impacts... are not to be substantially worse than existing wind conditions*.

Figure 18. Significant wind safety issues

Source: Adapted from the Central Precinct Renewal Wind Analysis 15 July 2022

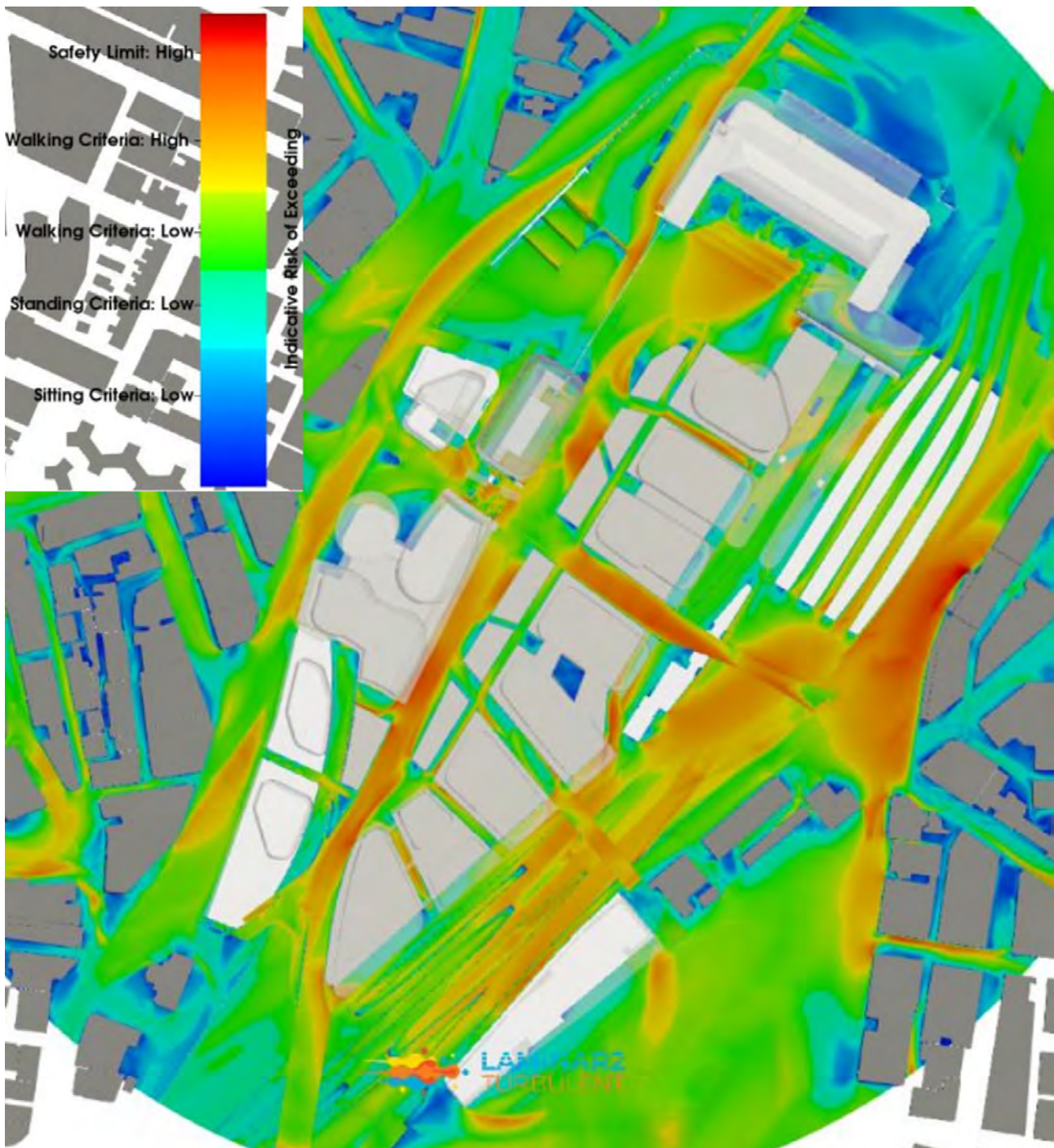
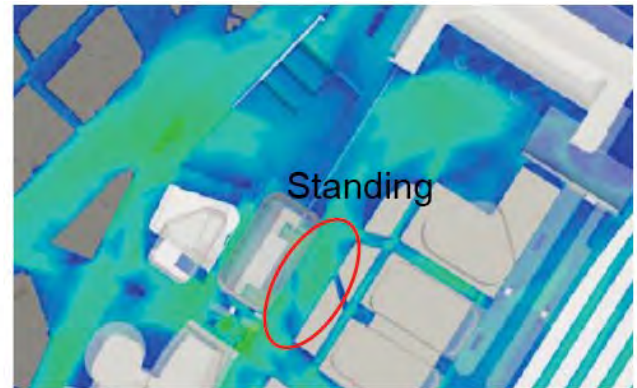
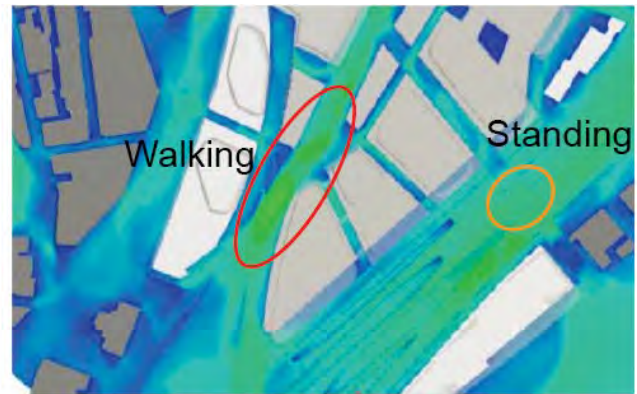
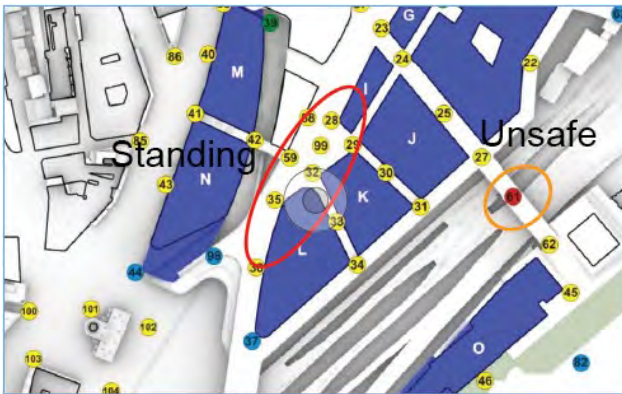


Figure 19. Wind tunnel and CFD models do not accord

Source: Central Precinct Renewal Wind Analysis 15 July 2022



Recommendation: Undertake modelling using the methodology consistent with Sydney DCP 2012 to enable comparison to other parts of the city

Recommendation: Recalibrate the wind tunnel testing with the CFD modelling to ensure they accord and are comparable.

Recommendation: Mitigate the impact of wind from the building envelope, massing and placement without reliance on the requirement for the canopies and enclosed kiosks shown in the Design Guide. Wind mitigation devices should be encouraged to be well designed, rather than a dual use as an artwork.

Recommendation: Redesign the masterplan to eliminate unsafe and uncomfortable pedestrian wind environments by implementing good design practice.

Recommendation: Ensure that all dwell spaces specified in the Design Guide and the majority of all public space, have wind conditions suitable for sitting.

Recommendation: Reconsider the wording in the Design Guide from *Wind impacts... are not to be substantially worse than existing wind conditions*, to be replaced with: *Wind impacts... are not to be substantially worse than existing wind conditions*.

Public spaces are not located in areas of high amenity

The poor wind environment and the lack of sunlight combined challenges the achievement of canopy targets for the precinct. The City's analysis shows that:

- Less than one third of the proposed public space has satisfactory solar and wind conditions.
- More than 30% of trees located in areas of sufficient sunlight are within high wind areas, making growth and establishment problematic
- Less than 40% of trees are located within areas conducive to healthy canopy growth

The City recommends reconsidering the masterplan, to locate public space in the places of best amenity.

Figure 20. Intersection of public places and high amenity

Source: City of Sydney analysis



This diagram overlays the areas of unsafe wind in black, over the solar access. It shows that most of the public space is located with poor sunlight, poor wind conditions, or both.

Figure 21. Less than on third of proposed public space has satisfactory solar and wind conditions

Source: City of Sydney analysis



Recommendation: Reconsider the masterplan, to locate public space in the places of best amenity. This includes enlarging Central Green to the east and to the south and a reconsideration of the main street width.

Green infrastructure

The City welcomes the Central Precinct Green Infrastructure Strategy and Section 13 of the Design Guide, which set out objectives, strategy and guidance to deliver green infrastructure, ecology, urban forest and greening. Further work is needed to ensure the green infrastructure proposed is achievable, particularly given the added complication of over station development.

There has been limited analysis of the site's constraints which inform the planting selection, for example no shade analysis is provided. The selection of plant species needs to be based on an understanding of the site's constraints, to ensure the right plants are selected for the right locations. Based on the information provided, it is questionable whether the planting strategy prioritises the selection of endemic/native species. While the sentiment behind this is appreciated, it should be acknowledged that the conditions created within an over station development are vastly different to those in the historic natural environment. Planting selection needs to respond to the conditions and constraints (soil, sunlight, water, wind) which will be created as the result of the new development in order for the plants to survive.

Recommendation: The planting strategy needs to be reconsidered to ensure the conditions created by the over station development inform the selection of plant species.

A high-water demand planting approach has been proposed which will rely on establishing a water recycling system. Irrigation requirements should be calculated at this stage to determine the minimum water demand. The integration of soils and water systems is critical to achieving the planting outcomes proposed, however there is little detail on how this will be delivered within the planning framework. If this is not implemented, then ability to achieve the greening outcomes will

be limited. Guidance to provide a secure, recycled water supply is recognised, and the City welcomes any future engagement on a potential connection to the George Street recycled water network.

Recommendation: In Section 14.1 of the Design Guide, Guidance #5 to be redrafted to avoid the implication that the implementation of any recycled water scheme is dependent on the outcome of a feasibility assessment and precinct procurement process.

Our community has told us that tree canopy should increase as much as possible. The City is aiming increase its canopy cover by 50% by 2030 from its 2018 baseline. Given the large proportion of land within private ownership, large development sites like Central Precinct are critical to making this happen. There is general alignment between the City's targets and the canopy cover and green cover targets set out in the Design Guide, though where specific areas cannot achieve their canopy and/or green targets, (such as Mortuary Station), an increase should be achieved in other locations (such as Central Avenue, Eddy Avenue Plaza). In addition, we make the following recommendations.

Recommendation: In Blocks A to F the proposed 0% canopy cover and 20% of greening for private property is inadequate. If canopy cover is not achievable at ground, the extent of greening must be increased on these properties to a minimum of 60% of each building's rooftop being a dedicated green roof, offsetting the provision of zero canopy cover.

Recommendation: In the Ibero-American Plaza there is sufficient distance along the side of the station, the light rail platform and overhead wires to increase canopy. It is highly exposed and would significantly benefit from shade and cooled space.

Celebrating heritage

Heritage

The City supports the objectives of the proposal to celebrate the heritage significance of the Precinct and to embed heritage values into the design and development of a unique, place-based destination by demonstrating design excellence and design quality.

The Central Railway Station complex is listed on the State Heritage Register. The precinct has a high degree of heritage significance for numerous reasons, including the following:

- as the site of the first Sydney Terminal and the starting point of the main line, from which the NSW rail network grew;
- previous uses of the site, including the Benevolent Asylum, Carters Barracks and Devonshire Street Burial Ground, evidence of which is likely to be found in the archaeological record;
- high quality architecture, with links to the Colonial and Government Architects, in particular the main terminal, Mortuary Station and Parcels Post Office;
- for the evidence provided of the changing technology of train travel from steam to electric trains;
- for its continuity of railway use since 1855, including a working yard;
- for its landmark status.

Furthermore, the listing on State Heritage Register as Sydney Terminal and Central Railway Stations Group, Central Station is recognised as being of state significance as a **precinct**. While individual components of this precinct have varying degrees of significance (ranging from exceptional to intrusive), the overall significance of the place needs to be the principal priority when considering major change to the place. Any heritage impact assessment needs to consider the impact of any proposed works against the overall significance of the place versus the impact upon the significance of the individual component.

The approach to heritage in the Central SSP development has been piecemeal, focusing on the components, rather than the site **as a whole**. The impact of the proposed Central SSP is the overall diminution of the STATE heritage significance of the precinct. The heritage significance of the place does not preclude major change, but nonetheless it needs to consider potential heritage impact.

With reference to the identified gradings of significance in the Conservation Management Plan (CMP) (Context 2022), the majority of the precinct north of Devonshire Street tunnel and west of the Suburban Platforms are either of 'exceptional' or 'high' significance. Policies 13 and 15 of the CMP reiterate standard guidelines regarding the management of components, spaces, elements and fabric of the Central Station Precinct consistent with their assessed levels of significance, particularly that elements of 'exceptional' and 'high' significance should generally be retained, conserved and maintained, while noting that there is generally more scope for change for the latter. Components of the precinct that are identified as having 'exceptional' or 'high' significance include the Main Terminus Building (Facades & Roof, Clocktower, Main Concourse) and the Country & Interstate Platforms. All of these will be impacted by the proposed development – either due to major change or changing context and physical or visual relationships.

Recommendation: In accordance with recognised heritage management policies, elements of 'exceptional' and 'high' significance should generally be retained, conserved and maintained.

It is noted that there are major works proposed for this precinct, including major over station development, resulting in a major impact on components that are of 'exceptional' and 'high' significance. This inappropriate heritage management is noted in the Non-Aboriginal Heritage Study (Artefact 2022), specifically stating that “overall, the heritage and cumulative impact to the state significant Sydney Terminal and Central Railway Stations Group would be major direct and indirect impacts.” (CMP, p117). Nonetheless, this study then proceeds to justify the individual components of the Central SSP, without considering the cumulative heritage impact of the potentially lesser heritage impact of these individual parts of the development. Furthermore, any mitigation measures recommended in this study are inadequate and focus on any future proposals for smaller developments within the greater precinct.

The proposed development will have a major heritage impact upon the precinct and on individual elements. The Non-Aboriginal Heritage Study (Artefact 2022) notes that other, more sympathetic options were investigated during the iterative design process, but that these were “considered and discounted as part of this process, in a balance of achieving good heritage outcomes and viable development at the Precinct”. This is an inadequate heritage response for a site of State significance.

The proposed Central Precinct is not consistent with the Heritage-related Principles as identified in the Draft Design Guide, which reiterate the state significance of the place, and note that the proposal will “respect and celebrate the heritage significance of the State heritage-listed Central Railway Station Sydney Terminal Group and its individual components and the appreciation of key heritage values including significant view lines and the extensive and prominent use of sandstone” (p10). The scale of the proposal does not reflect this important principle.

The Explanation of Intended Effect (2022) incorrectly notes that “the majority of Central Precinct is listed as having State heritage significance” (p14) and focuses on three individual elements: the whole of the site is listed on the State Heritage Register. The Urban Design Framework (Architectus 2022) reiterates this inappropriate piecemeal approach to heritage, focusing more on the significance of individual elements, rather than the place as a whole, and thereby justifying more change than is acceptable.

Recommendation: Any development of the Central Precinct needs to respect the state heritage significance of the whole site, rather than the heritage significance of the individual components.

Historical visual relationships between components of the site are important to be maintained including views from the concourse to the platforms and trains. The proposal includes oversized stairs between the concourse and OSD deck which significantly reduce these views.

Recommendation: Reconsider the design of the stairs to maintain views between the concourse and platforms.

The proposed approach to Aboriginal Cultural Heritage is commendable, especially the recommendations contained within the Aboriginal Cultural Heritage Study. In particular, the following recommendations are particularly useful to guide the management of Aboriginal heritage significance within the precinct:

- Inclusion of Aboriginal expertise within architectural/design teams in co-design roles
- Ongoing consultation with Aboriginal knowledge holders and establishment of an Aboriginal reference group during and for future planning for development
- Adoption of the Connecting with Country framework (Balarinji 2022)

Similarly, the proposed approach to managing archaeology is supported. The Archaeological Site Plan (Artefact 2022) maps all potential archaeology across the whole SSP precinct (as comprehensively as possible) and provides a long-term management document to guide works planning, site management and heritage assessments, and to minimise the likelihood of unexpected archaeological finds within the Site Plan assessment area. Importantly, this approach provides a grading of significance for any likely archaeological resources, a grading of heritage significance and management recommendations - from avoidance of any impact by development and retention in situ, record and salvage, recording before removal, and complete removal without any other requirements.

Visual impact

Regardless of the strategic vision for this precinct, the proposal will have major visual impacts upon important views of the Central Clocktower, especially towards the south. Historical visual relationships between components of the site are important to be maintained including views to the clocktower from the suburban platforms. Historically, the clocktower at Central was an iconic landmark in the southern part of Central Sydney – this is an important aspect of the heritage significance of the precinct. The proposal reduces the current views of the clocktower against the sky to an extent that is inappropriate. Moving development further south of a similar scale would retain most if not all the important views of the clocktower against the sky.

Recommendation: Reconsider the position of the Block A tower and the wider development, moving it further south to maintain significant views of the clocktower against the sky.

The character of Prince Alfred Park benefits from long views as a result of the rail corridor. The proposed built form presents a wall of development diminishing the historic character of the park. This also diminishes the heritage significance of the place.

Recommendation: Reconsider the built form as viewed from Prince Alfred Park so there are fewer buildings with more separation.

Figure 22. Significant views of the clock tower impacted by the placement of towers

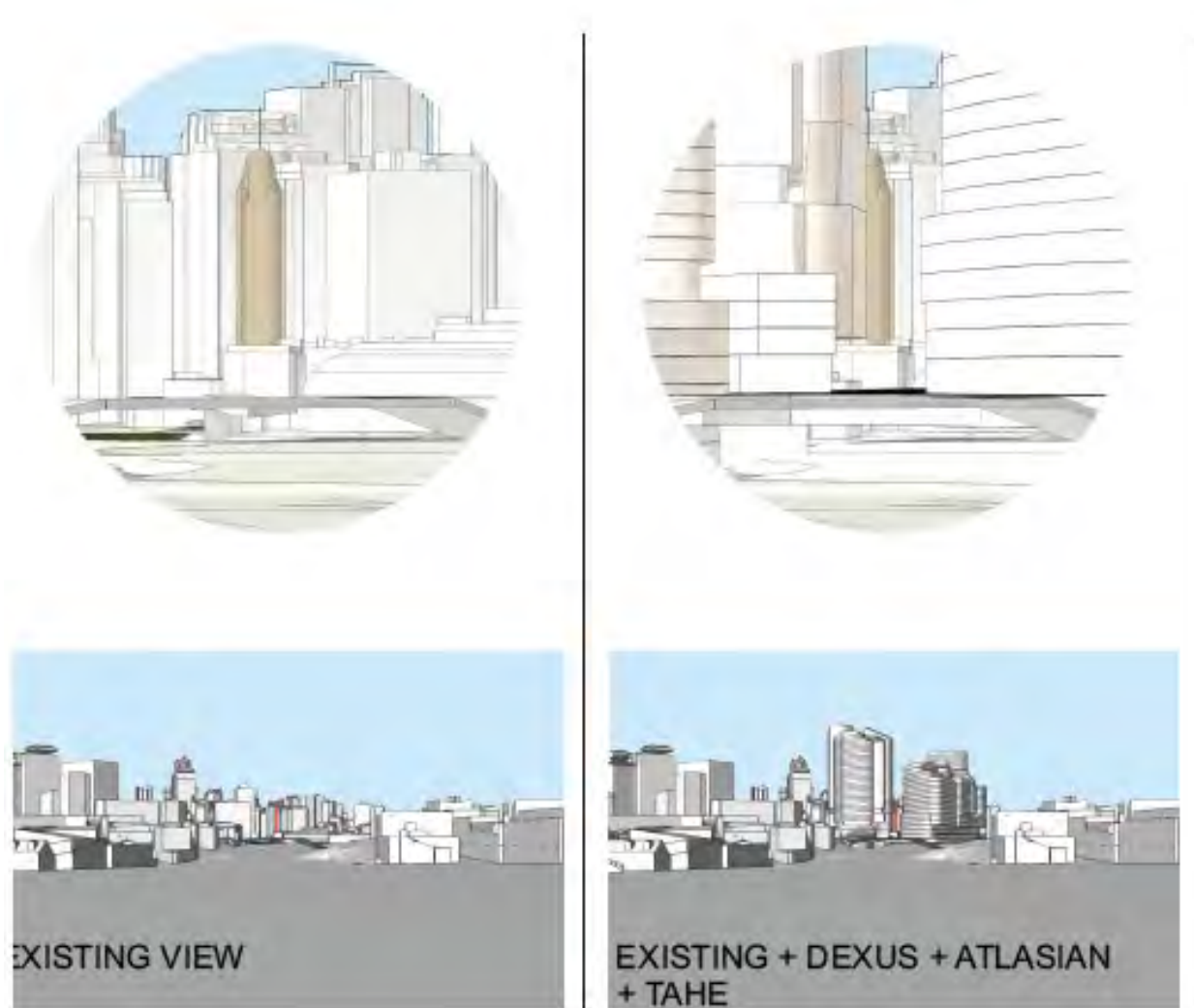
Source: City of Sydney analysis



The diagrams above show the significant long views of the clocktower, and the impact of the proposed development on these views, and the view from Prince Alfred Park.

Figure 23. View of the clock tower from Redfern Station

Source: City of Sydney analysis



Mortuary Station

The Mortuary Station is a particularly distinctive component of the precinct and needs special consideration in any proposal. It is essential that any works associated with the Mortuary Station Plaza ensure that train access to the station is retained. Links to Rookwood Cemetery should be addressed in heritage interpretation, but not replicated in any landscape design in this precinct (as implied in the Central Precinct Design Guide (2022) and the Heritage Interpretation Strategy (Artefact 2022)). Mortuary Station should be able to be used as a functioning platform for heritage trains.

Recommendation: Reconsider the design of the public realm to ensure that Mortuary Station is capable of being used as a functioning platform for heritage trains and identify other opportunities for rail heritage stock to continue operating at Central Station as part of the ongoing interpretation of the precinct's heritage values.

Restorative and carbon negative in every aspect

The City welcomes the proposal's ambition to 'create a low-carbon precinct' and to deliver 'world-leading environmental sustainability outcomes at Central Precinct'. The City shares this vision and would like to work with TfNSW/TAHE to further develop the planning controls to deliver it.

While the proposal includes high-level objectives for sustainability, the guidance needs to be more robust to deliver these principles and to deliver a low carbon and environmentally sustainable

precinct. The language used in the Design Guide is littered with qualifiers and non-committal language ('should aspire to', 'subject to', 'is encouraged to') which negate any real responsibility in delivering on the ambitions for a sustainable district.

Recommendation: The proposed Design Guide must be reviewed in its entirety to replace vague and non-committal language with firm and specific requirements to achieve sustainable outcomes precinct-wide.

The City welcomes the targets for building performance, which meet and at times exceed the City's own policies. In other areas of sustainability, the targets set in the Design Guide fall short of what the City would expect for a 'best practice' precinct. In instances, targets do not align with the City's or the State's own policy.

This is particularly significant given the lengthy 20+ year timescales of the construction period for the precinct. Given the need to scale up emission-reduction and drive circular materials management over time, by the time the precinct is constructed, weak targets will be completely out of sync with industry standards.

The City supports the proposal to deliver precinct-wide systems for water recycling, energy, integrated waste and materials management, and soil systems, which could offer real potential. Delivering these precinct-wide integrated systems, as is proposed, requires oversight and coordination. There is no clarity on who is responsible for delivering these systems, nor at which point in the staged process they will be provided. It is at this early stage of a process when precinct-wide planning can seize these opportunities.

Recommendation: The proposed Design Guide must be reviewed in order to identify the parties responsible for delivering precinct-wide sustainability systems, and to set requirements for investigation and delivery in relation to concept development applications and building development applications.

Climate change

The vision for Central Precinct is to create 'world-leading environmental sustainability outcomes'. However, the proposed controls do not offer a pathway to achieving these outcomes. The requirement to deliver Net Zero from the outset should be unequivocal. The requirement to build an Integrated Utilities Hub should be unequivocal. The objectives on the provision of renewable energy and climate risk and adaptation are supported, but more information is required on who will be responsible for developing such a network, and whether it will be delivered at a building or precinct scale.

Recommendation: Section 12.1 of the Design Guide should be updated to state the precinct will *achieve* net-zero emissions, not just *contribute towards* them.

Recommendation: Section 12.1 of the Design Guide requires additional guidance providing a solid commitment to using 100% renewable energy. Stating that development is not to preclude the provision of 100% renewable energy is insufficient.

Recommendation: Section 12.2 of the Design Guide allows for the *consideration* of an Integrated Utilities Hub. The guidance should instead *require* the delivery of an Integrated Utilities Hub.

Recommendation: Section 12.3 of the Design Guide requires additional guidance on the delivery of an embedded network supplied with 100% renewable energy, and whether it is delivered at building or precinct scale, including a requirement for investigations and a delivery plan prior to any concept development application. Add a requirement under provision 5 to procure 100% renewable energy for the precinct and each building in the event the private network is not established to ensure the commitment to net zero is realised.

Recommendation: Section 12.7 of the Design Guide requires additional guidance for carrying out and implementing the Climate Risk and Adaptation Plan with development applications by stating the first concept development application is to provide a precinct wide plan and each building development application is to implement the Plan.

The proposed controls are not specific enough to provide the intended level of resilience to potential changes in rainfall intensity. In Section 14.2 of the Design Guide, Guidance #4 requires civil drainage to be designed to RCP8.5 climate change scenario. In Section 14.3 of the Design Guide, Guidance #2 requires the impact of RCP8.5 climate change scenario to be considered when setting flood planning levels. However, these requirements do not specify the point in time at which these scenarios are to be applied and this could lead to inconsistency in their application.

Recommendation: Where 'RCP8.5 climate change scenario' is specified in flooding and drainage requirements, this should be accompanied by a suitable future point in time (eg 2100) to allow design parameters to be derived and applied consistently.

The climate adaptation report has successfully evaluated the risks of climate change and identified measures to make the future precinct more resilient to these risks. However, it is unclear how the mitigation measures have been incorporated into the Design Guide.

Recommendation: Identify mitigation measures and incorporate this as prescriptive guidance in the Design Guide to support future developers and planners in creating a resilient precinct.

Water management

The proposed Design Guide controls for water management will not deliver precinct-wide water management goals in a consistent and integrated fashion. The proposal is designed with the intent to follow an integrated water management approach, which considers the various sources and demands for water across the precinct and seeks to balance these in a way that manages stormwater quantity management, flood risk, non-potable water demand and urban cooling. The Water Quality, Flooding and Stormwater Report recommends that an integrated water management plan be prepared at some point in project development, however there is nothing in the Design Guide controls that requires this to happen or for development stages to have reference to this report in their implementation.

The Water Quality, Flooding and Stormwater Report (Section 6.2.1) proposes a 'sub-precinct approach' to stormwater management, in which individual development stages would need to meet bespoke development controls that have been set considering the constraints of each stage and the delivery of the precinct-scale aims. Under this approach each stage is stated to independently manage and discharge stormwater to downstream where feasible. Without a clear, detailed integrated water management plan for the whole precinct, there is a risk that this sub-precinct approach will not deliver the proposal's aims by, for example:

- Opportunities to exceed water quality best practice are not identified and there is no requirement for these opportunities to be taken when relevant sub-precincts are brought forward for development.
- Cumulative minor flood impacts from each sub-precinct will accrue to create a significant change in flooding conditions. Stormwater detention requirements will need to be set at a precinct-scale to allow them to be effectively applied to sub-precincts.
- Discharging water from highly developed sub-precincts that could be used for irrigation in another sub-precinct or for non-potable supply in a precinct-scale supply system.

Recommendation: Create a standalone requirement at the start of the Design Guide for a precinct-wide Integrated Water Management Strategy to be submitted and approved prior to the approval of the first development application for the precinct. This should be based on the existing requirement in Section 14.1 of the Design Guide, Guidance #7, with the scope

increased to include flood risk management, stormwater drainage and water quality management.

The precinct-wide Integrated Water Management Strategy should be required to include as a minimum:

- Identification of opportunities to exceed best-practice stormwater quality targets and how these opportunities will be delivered through development stages.
- A precinct-wide flood study and mitigation strategy, which identifies measures required to mitigate flood impacts from the full precinct and how these will be delivered through development stages.

A firm commitment to provide a reliable recycled water supply must be present in the Design Guide, whether through a private water recycling scheme, a public authority water recycling scheme, or a connection to a shared water recycling scheme. This requirement must be established, with its provision not dependent on vaguely worded guidance for a feasibility assessment or precinct procurement process.

Recommendation: In Section 14.1 of the Design Guide, Guidance #5 to be redrafted to avoid the implication that the implementation of any recycled water scheme is dependent on the outcome of a feasibility assessment and precinct procurement process.

NABERS Water Commitment Agreement mechanism does not currently exist. While it may in the future, currently NABERS water ratings are of lesser value because of occupancy settings that do not reflect the range of user contexts. It is more important to lock in fundamental design requirements, such as high ratings for individual fittings and appliances, non-potable water supply to toilets, irrigation and cooling tower top-up, locking in water savings through the lifetime of the building.

Flood risk management

The proposed Design Guide controls for flood risk management are not sufficient to prevent detrimental changes to off-site flooding. The Water Quality, Flooding and Stormwater Report (Section 6.2.1) identifies increases in flood levels of up to 0.10 m in the 1% AEP event at low points on Lee Street and Broadway. Increases in flood level in the PMF of up to 0.20 m are also predicted in these low points, as well as on streets downstream towards the intersection of Broadway and Wattle Street, and on Chalmers Street upstream.

Controls currently proposed in the design guide will limit changes in flood depth to 0.05 m in the 1% AEP only and only for individual development stages. These controls are insufficient to prevent the predicted flood increases as they adopt a definition of impact that is unreasonably high for a dense urban area, and do not consider the potential cumulative impact of development stages each increasing flood depth by a magnitude less than the limit.

Flood depth increases in the PMF have the potential to increase risk to life downstream of the precinct by flooding existing basements that are protected to existing PMF level (as required by the City's Interim Floodplain Management Policy).

The executive summary of the Water Quality, Flooding and Stormwater Report identifies that the project presents opportunities to further mitigate existing flood risk. It is not clear that this has been considered in the development of the strategy.

Recommendation: In Section 14.3 of the Design Guide, Guidance #2, change the requirement to prepare a flood study to require a detailed precinct-wide flood study and mitigation strategy to be submitted and approved prior to the SSI application for the OSD deck, or the approval of the first development application for the precinct, whichever comes first.

Recommendation: In Section 14.3 of the Design Guide, Guidance #2, change the definition of flood impact from +/- 0.05m to +/- 0.01m.

Recommendation: In Section 14.3 of the Design Guide, Guidance #2, include an additional requirement providing the definition of on-site detention volumes and flow rates required in each development stage or as a rate per hectare.

Recommendation: In Section 14.3 of the Design Guide, Guidance #2, include an additional requirement considering the impact of flood level changes in the PMF to be considered in terms of impacts on existing basements and, where an increased risk to life is expected, propose mitigation measures.

Recommendation: In Section 14.3 of the Design Guide, Guidance #2, include an additional requirement considering opportunities to reduce existing flood risk as part of mitigating the impact of the precinct, including considering options proposed in the vicinity of the precinct in the City of Sydney's Flood Risk Management Plans (FRMPs) for the relevant catchment.

Recommendation: In Section 14.3 of the Design Guide, Guidance #2, include an additional requirement for flood impact assessments to be submitted with each development stage that consider the cumulative flood impact of the complete precinct and include mitigation measures consistent with the approved precinct-wide flood study and mitigation strategy.

Circular economy and materials

As the authors of the NSW Circular Economy Policy Statement, the State Government should ensure that large scale new developments, especially those with a tech focus such as Central Precinct, are demonstrating leadership in achieving real and measurable zero waste and circular economy outcomes in the built environment. The reports should go beyond identifying opportunities and principles. Prescriptive controls on specific stated outcomes need to be included as requirements for this development. The Design Guide's guidance on circular economy and materials should be specific, providing sufficient detail or specifications to assist developers or planners on how buildings or infrastructure could be designed and constructed to meet the stated objectives. In particular, there is a need to consider how circular economy is incorporated during the design phase of the precinct and not simply the operational phases.

Recommendation: Section 12.9 of the Design Guide should contain additional guidance that considers the following:

- Using design guides for buildings with prefabricated/modular features, providing long-life, flexible and adaptable solutions
- Developing adaptable and reusable infrastructure that can be remodelled as the precinct grows and changes
- Eliminating construction waste with programs with volume builders to encourage waste minimisation in building design
- Using recycled and renewable materials
- Designing out waste in supply chain and manufacturing, and eliminating single-use items
- Designing infrastructure, collection, processing, policy, procurement, pricing, and behaviours to produce high-quality outputs for high-quality inputs to other processes.
- Combining services for transport efficiency (commercial, industrial and residential) around materials rather than land use (eg organics, plastics, residual waste)
- Providing processing and treatment facilities at a range of scales
- Establishing network-based drop-off points in preference of door-to-door collection
- Providing opportunities for reuse and repair, leasing, and sharing facilities, collection points for producer responsibility schemes, storing and reverse logistics facilities.

Operational waste

While the Environmental Study and the Design Guide identify high-level objectives in terms of waste the level of ambition falls short of what the City would expect for a 'best practice' precinct. Central Precinct should not be locked into minimum-standard waste requirements; it should instead seek to deliver beyond them including innovative ways to achieve NSW and City of Sydney targets and minimise waste to landfill and maximise resource recovery. Consideration must be given towards precinct-scale strategic oversight on waste and recycling infrastructure design, space, access and management. Without adequate consideration at the design stage, significant opportunities for precinct-wide resource recovery and best-practice waste management will be missed.

Recommendation: The City does not support the proposed '60% reduction in operational waste to landfill' target. Section 12.10 of the Design Guide should contain targets that match, if not exceed, those set by the NSW Government Waste and Sustainable Materials Strategy 2041 and the City of Sydney's Waste Strategy and Action Plan. In particular:

- A target of a minimum 50% recovery and reuse of organic waste produced within the precinct
- A target of 80% resource recovery rate from all material streams.

Recommendation: Guidance in Section 12.10 of the Design Guide should link and commit to City and State targets and sustainability benchmarks, allowing the precinct to remain up-to-date as relevant standards change.

A centralised waste management network should be addressed in the guidance in order to meet the stated objectives. This network would set the framework for all developments to consider how they integrate into this network for waste storage, transfer and collection. The integrated waste management strategy should be more comprehensive to support the appropriate sizing of infrastructure, storage and loading areas and servicing requirements for waste and recycling management for the entire precinct. The precinct must be designed to accommodate leading source separation of materials including separated organic and inorganic recycling streams e.g. food organics. All developments must demonstrate how they are designed to integrate with the precinct-scale waste management network and strategy. All waste and recycling management systems must demonstrate how they minimise negative impacts of waste management on the streetscape, public space, building presentation and amenity of pedestrians, occupants and neighbouring sites.

Recommendation: Section 12.10 of the Design Guide should include additional guidance to require all developments to provide adequate space within tenancies, buildings and shared waste storage areas for waste infrastructure, source separated streams including general waste, recycling, organics, bulky and problem waste.

Recommendation: Section 12.10 of the Design Guide should include additional guidance on precinct design including space for on-site organics processing infrastructure or storage for off-site processing, sized for the modelled organic waste generation from the precinct.

Recommendation: Section 12.10 of the Design Guide should include guidance requiring all buildings to have collections for all streams of waste, including organics on each floor, within building and mechanisms for the collection and transfer to on-site processing infrastructure or shared collection or processing point.

Recommendation: Section 12.10 of the Design Guide should specify that all residential waste collection areas comply with the City of Sydney's Guidelines for Waste Management in New Developments.

Recommendation: Section 12.10 of the Design Guide should require designated space for reuse and recycling initiatives including but not limited to:

- Eat-in food courts within the precinct must accommodate designated space and requirement for shared re-usable serve ware and cleaning facilities to minimise single use and maximise opportunities for re-usable materials
- Any food retail outlet to have dishwasher to minimise single use and maximise opportunity for re-usable materials
- Buildings to have separate dedicated space such as a room provided for the separate interim storage and management of strip out waste for re-use or recycling.
- Provision is to be made on each floor, and in the waste and recycling storage area or any interim holding area, for the separation and storage of all recyclable items (including mixed containers, cardboard, paper and paper products) likely to be produced from the premises.

Achieving design excellence

The City commends the level of design excellence exhibited in the reference design and is seeking strong planning controls which will ensure that this level will be delivered or exceeded for all public spaces and buildings.

City of Sydney Competitive Design Policy

The City supports the provision of an overarching precinct-wide Design Excellence Strategy to guide the coordination, timing, and delivery of design excellence through masterplan, building and place competitions. However, each individual competition must be run in accordance with the City of Sydney Competitive Design Policy.

In accordance with Section 2.4 of the Government Architect's Draft Design Excellence Competition Guidelines, as the City has its own competition policy, all competitive design processes in the Central Precinct are required to be undertaken in accordance with the City of Sydney Competitive Design Policy.

The planning controls for the Central Precinct will be contained in the Sydney LEP 2012. The definition of "competitive design process" in the Sydney LEP 2012 "means an architectural design competition, or the preparation of design alternatives on a competitive basis, carried out in accordance with the City of Sydney Competitive Design Policy." As such, all competitions in the Central Precinct should be required to be undertaken in accordance with the City of Sydney Competitive Design Policy.

Page 21 of the Design Excellence Strategy refers to "alternative Design Excellence approaches" which will be later developed. All competitions within the Central Precinct are required to be carried out in accordance with the City of Sydney Competitive Design Policy.

The City supports the undertaking of masterplan competitions for the Central Precinct. Masterplan competitions are able to be undertaken following the City of Sydney Competitive Design Policy.

Recommendation: Amend the Design Guide, EIE and Design Excellence Strategy to state that masterplan competitions must be run in accordance with the City of Sydney Competitive Design Policy.

Recommendation: References to "or the NSW Government Architect Competitive design policy" should be removed across from the EIE, Design Guide, Design Excellence Strategy and supporting documents.

Matters for consideration

The EIE states a site-specific LEP provision will be included which will "identify specific matters to be considered when demonstrating design excellence." As the planning controls for the Central

Precinct will be contained in the Sydney LEP 2012, new controls for matters for consideration for Design Excellence should not be introduced. The provisions in 6.21C of the Sydney LEP 2012 which identify the matters for consideration for Design Excellence should be retained.

The Design Guide is the appropriate mechanism for the inclusion of additional matters for consideration.

Recommendation: Remove reference towards a site-specific provision to “identify specific matters to be considered when demonstrating design excellence” from the EIE and include any additional matters for consideration within the Design Guide.

Retention of clause 6.21D of the Sydney LEP 2012 (10% bonus FSR)

The EIE states that no addition floor space will be awarded under the proposed site specific design excellence provision. The Planning Report states the proposed site specific LEP provisions will specify that clause 6.21D of the Sydney LEP 2012 will not apply to development within the Central Precinct. The City recommends that clause 6.21(D) is retained to preserve the incentive for undertaking a competitive process, with the award of up to 10% additional floor space reserved for a building demonstrating design excellence, as defined under the LEP. To accommodate the retention of the incentive for undertaking a competitive design process, the total achievable floor space within the site specific LEP clause should be reduced by 10% to allow for additional height or FSR of up to 10% to be awarded through clause 6.21(D) following the completion of a competitive design process.

If the above advice is not adopted, section 6.9 Development Bonuses in the Design Excellence Strategy should be retained. And a provision included in the site-specific LEP amendment, to specify that no additional floor space or building height bonuses will be awarded for a building demonstrating design excellence within the Central Precinct.

Recommendation: Reduce the total achievable floor space within the site specific LEP clause according to the City’s methodology and update the planning controls to offer the award of up to 10% additional floor space reserved for a building demonstrating design excellence, as defined under the LEP.

Key Building Competitions

Clause 6.21D in the Sydney LEP 2012, stipulates that development consent must not be granted to development which will have a height above ground level (existing) greater than 55 metres on land in Central Sydney, unless a competitive design process has been held. The proposed permissible height limits for the rezoning (with some minor exceptions) range from 55 metres to 204 metres. Competitions should be held for all buildings which have a height of 55m or greater.

Competitions are only identified for select or ‘key buildings’ in the Central Precinct. The Design Excellence Strategy states key building competitions are “for buildings that have a significant impact due to the building location, scale, function or proximity to heritage structures.” The City considers due to the scale, visibility and importance of the Central Precinct, competitions should be undertaken for all buildings which require a competition in accordance with clause 6.21D of the Sydney LEP 2012.

Recommendation: Amend the Design Guide, Design Excellence Strategy and supporting documents to require a competition for all buildings in accordance with clause 6.21D of the Sydney LEP 2012 being those over 55m high.

Key Place Competitions

Section 6.2.3 of the precinct wide Design Excellence Strategy identifies a key place competition to be carried out for Central Square.

The Design Competition boundary for Central Square shown in figure 4 should be expanded to incorporate the Railway Square, the upper square (marked number 4 on the map and designated for rail replacement buses) and the closure of Lee Street to ensure the entirety of Central Square is included in the competition.

In recognition of the multiple landowners of Central Square (TAHE, TfNSW and the City of Sydney), the precinct wide Design Excellence Strategy (attachment 7) and future place-specific Design Excellence Strategy should identify the design competition as a collaboration between the landowners, to be coordinated and run cohesively to deliver design excellence.

Recommendation: Amend the design competition boundary for Central Square to include Railway Square, Lee Street and the Upper Square and clarify that the design competition would be a collaboration between the three landowners.

Jury

In recognition of the precinct's state significance, the City supports the proposed five (5) member jury weighted in the public interest in accordance with part 3.4 of the Government Architect's Draft Design Excellence Competition Guidelines.

All juries are to include a member nominated by the City of Sydney (local authority), in accordance with part 3.4 of the Government Architect's Draft Design Excellence Competition Guidelines.

The Design Excellence Strategy identifies that jury selection is carried out by the Design Governance Panel. This should be removed due to inconsistency with part 3.4 of the Government Architect's Draft Design Excellence Competition Guidelines which clearly sets out what party nominates each jury member.

Recommendation: All juries are to include a member nominated by the City of Sydney (local authority), in accordance with part 3.4 of the Government Architect's Draft Design Excellence Competition Guidelines.

Remove reference to the 'Design Governance Panel' carrying out jury selection as this is inconsistent with the Government Architect's Guidelines.

Design Integrity

Whilst the Design Excellence Strategy makes reference to a design integrity process, this is not clearly mapped out. The City supports the inclusion of the design integrity process detailed in the Government Architect's Draft Design Excellence Competition Guidelines for the Central Precinct.

It is unclear what the role of the Design Governance Panel and the Design Advisory Panel is in the Design Integrity process.

Recommendation: More information is needed on the design integrity process, ensuring alignment with the Government Architect's Draft Design Excellence Competition Guidelines.

Design Governance Panel

The Design Governance Panel must include a panel member nominated by the City of Sydney.

The Design Governance Panel's list of responsibilities written in the strategy conflicts with section 3.4 of the Government Architect's Draft Design Excellence Competition Guidelines. The list of

responsibilities should be updated to exclude jury selection, to ensure consistency with the Government Architect's Draft Design Excellence Competition Guidelines.

The Strategy identifies the review of design development compliance and deviations with jury recommendations, as a responsibility of the Design Governance Panel. This is inconsistent with section 5 of the Government Architect's Draft Design Excellence Competition Guidelines which prescribes the jury or other independent design experts to the design integrity role. It should be clarified if the Design Advisory Panel as independent experts undertake this function.

The Strategy states on page 19 "TfNSW and the delivery partner, in consultation with GANSW, DPE and the City of Sydney will establish a Design Governance Panel." This is inconsistent with page 21 of the Strategy which states the "makeup of the Design Governance Panel will be determined in partnership with the office of the GANSW, TfNSW and the future delivery partner for the Central Precinct Renewal Program." As stated on page 19 of the Strategy, the City of Sydney should be consulted in the establishment of the Design Governance Panel and selection of members.

Design Advisory Panel

The Design Advisory Panel must include a panel member nominated by the City of Sydney.

The Strategy states on page 19 TfNSW and the delivery partner, in consultation with GANSW, DPE and the City of Sydney will establish a Design Advisory Panel. This is inconsistent with page 22 of the Strategy which states the selection of the panel members on the Design Advisory Panel will be by the Design Governance Panel. As stated on page 19 of the Strategy, the City of Sydney should be consulted in the establishment of the Design Advisory Panel and selection of members.

Recommendation: The Design Excellence Strategy should be updated to stipulate that the Design Governance Panel and the Design Advisory Panel must both include a panel member nominated by the City.

Recommendation: The City of Sydney should be consulted in the establishment of the Design Governance Panel and selection of members.

The remit, role and relationship between the Design Governance Panel and Design Advisory Panel is unclear. Section 6.4 of the Design Excellence Strategy refers to additional matters which are not attributed to either panel within Section 7.

Recommendation: The role and responsibilities of each panel should be clearly set out in the Design Excellence Strategy, along with identifying how the panels coordinate and work together.

Observers

The Design Excellence Strategy should include a section on observers. Impartial observer(s) from the City of Sydney and the Consent Authority should be invited to attend all competitive design processes (including jury deliberations and design integrity processes) to ensure the competitive process has been followed appropriately and fairly.

Recommendation: Amend the Design Excellence Strategy to include a section on observers.

Project-specific Design Excellence Strategies

The Design Excellence Strategy makes reference to the preparation of project-specific Design Excellence Strategies for each competition. The approval pathway for these Project-Specific Design Excellence Strategies should be clearly articulated in the overarching Design Excellence Strategy.

Monitoring

Section 6.10 of the Design Excellence Strategy commits the proponent to regular review and refinement of the design excellence strategy which is supported by the City. However, amendments to the Strategy should be prepared in consultation with GANSW, DPE and the City of Sydney.

It is unclear what the approval pathway is following completion of the review and refinement of the Design Excellence Strategy.

Recommendation: Amend the Design Excellence Strategy to specify the process for amendments and the approvals pathway for the refined Strategy, requiring consultation with GANSW, DPE and the City.

Competitive Design Alternatives Report

Section 6.7 of the Design Excellence Strategy 'Competitive Design Alternatives Report' has been partially lifted from the City's Competitive Design Policy and refers to a competition type called the 'Competitive Design Alternatives Process'. It is recommended that terminology in this section is updated to be consistent with the rest of the Design Excellence Strategy, including the following:

- Competitive Design Alternatives Report changed to Competitive Design Process Report
- Selection Panel is changed to Jury

Recommendation: Update the Design Excellence Strategy in the 'competitive design alternatives process' section to make terminology consistent with the rest of the document.

Competition Briefs

In addition to GANSW and DPE, consultation on the competition brief should also occur with the City of Sydney.

Recommendation: Amend the Design Excellence Strategy to specify that consultation for competition briefs should occur with the City of Sydney.

Transport and movement

The City endorses the aim of the proposal to prioritise pedestrians on the OSD deck and encourage cycling, public transport and car sharing as the primary modes of travel within Central, while ensuring accessibility for all.

In addition to the commentary and recommendations about connections above, this section includes further advice regarding transport and movement. An attached appendix provides further detail on these recommendations.

At the point of the exhibition, the City has yet to see the transport modelling due to delays to population and employment forecasts. Without seeing the outputs of the modelling analysis, the City is unable to provide informed comment on the transport strategy and assessment of Central Precinct. As such, all comments relating to transport and access should be taken as preliminary only.

- The City will make additional comments once the completed transport modelling is provided.
- The City will comment on construction traffic management at DA stage once a detailed Construction Transport Management Plan (CMTP) is prepared.

Modelling and assumptions

Upon initial review, there are several areas for which the assumptions and modelling are faulty or inadequate to underpin the proposals:

- The proposal needs to take ownership of cumulative transport impacts.
- The proposal does not correctly assess and acknowledge the significant impacts of the development on people walking in the broader precinct.
- Inconsistencies in the Central Precinct demand distribution need to be addressed.
- The loading strategy must consider all loading needs, not just day-to-day requirements.
- The strategy should specify function before technology in the case of electric and autonomous vehicles.

The planning controls should be amended to take account of the following:

- Specify in the Design Guide that the TfNSW/TAHE Walking Space Guide is to apply to all areas outside the gate line and that Level of Service (LOS) C will be the minimum target.
- Reference, support and align with key strategic transport documents: Camperdown Ultimo Place Strategy (Greater Sydney Commission), Tech Central Place-Based Transport Strategy (TfNSW), South East Sydney Transport Strategy (TfNSW), and Sydney City Centre Access Strategy (TfNSW)
- Commit to reducing speed limit on all roads surrounding and within the Central Precinct to 30km/h
- Commit to not precluding the City's plans for streets and public domain:
 - Reallocating space from vehicles to place, people and planting on Broadway in line with the City's Greening Broadway initiative in Sustainable Sydney 2050 strategy.
 - Harris Street converted to two-way
 - Chalmers Street calmed and narrowed at crossings
 - Elizabeth Street south of Devonshire converted to two-way to calm traffic
 - Foveaux Street and Albion Street converted to two-way east of Mary Street to calm traffic
- Revise the 2036 road network conflict diagram (Fig 5-12) to better reflect the desired safety and place outcomes. The proposal should commit to minimising volumes.
- Amend the plans to show the southern cross-rail cycle route clearly and consistently across all documents on exhibition. Articulate how the southern rail crossing is to function and how it connects to the broader network.
- Show the provision of bike parking and end of trip facilities in Eddy Plaza in Figure 31 of the Design Guide, in alignment with the Transport Assessment
- Mapping of existing bike network should note that Devonshire Street is one-way
- All maps should differentiate between local and regional cycling connections
- Amend documents to be made consistent regarding parking provision and to cap parking at 208 spaces in line with the Transport Assessment.
- The Design Guide should stipulate that all residential parking to provide as unbundled, where the cost of buying or renting an apartment is separate to the cost of buying or renting a car parking space.
- The Design Guide should provide specific requirements for electric vehicle charging, including:
 - 100% of residential and 50% of commercial parking spaces are to be capable of supporting electric vehicle charging

- 25% of visitor parking bays must have Level 2 or higher charger fitted
- All car share bays must have Level 2 or higher chargers fitted
- Loading rates should be amended to reflect DCP
- Remove 7.4.5 so that service vehicle parking is not shared with other parking uses as it will erode the utility of servicing the precinct

Recommendation: Update the planning controls to respond to the above.

Noise and vibration

Long-term background noise measurement

Long-term background noise measurements have not been specifically carried out for this project, with a number of assumptions made in their place. While we acknowledge the impact of the COVID-19 pandemic on human activity and related noise, Central Station remains a commercial and transport hub, and any current reduction in noise levels may be a reflection of long-term changes in work patterns and human movements. The omission of this information makes it hard for any planning authority to evaluate such development in the context of a change to the noise environment.

Construction noise and vibration criteria

The City is comfortable with the proposal for a construction noise and vibration management plan, providing information on how the precinct will be delivered and realised, to be provided at a detailed design phase prior to works beginning. However, it is inappropriate for performance criteria for noise and vibration to have not been established prior to consent stage. Substantial construction noise and vibration will be generated in order to realise the precinct. Performance criteria are vital in order to adequately assess and control the impact of noise and vibration and should be included in any noise and vibration report placed on public exhibition for this precinct.

Alignment with Sydney DCP

Planning controls regarding noise and vibration, and acoustic privacy should be written to ensure alignment with the Sydney DCP, so there is no variation of standards between Central Precinct and surrounding districts. In particular, to limit the transmission of noise to and between dwellings, all floors should have a weighted standardised impact sound level ($L'_{nT,w}$) less than or equal to 55 where the floor separates a habitable room and another habitable room, bathroom, toilet, laundry, kitchen, plant room, stairway, public corridor, hallway and the like.

Recommendation: Provision 10 of Section 4.2.3.11 'Acoustic Privacy' of the Sydney DCP should be adopted and inserted into Section 9.6 of the Design Guide to ensure alignment regarding weighted standardised impact sound level.

Public art

The City has reviewed the Public Art Strategy and endorses the proposed provision of public art, which will be critical to contributing to the character of the place and supporting culture.

The City notes that a Public Art Plan will be developed at an unnamed future stage in response to the currently exhibited Masterplan. In reference to the proposed Public Art Strategy, the City raises the following points:

- The Strategy is unclear as to which of three funding options is being proposed – Government funded, privately funded, or a combination of both. We welcome the proposed budget of 1.5% of the cost of construction, but who is to provide those funds – government or the private sector?
- The annual funding of \$7.5m for a Live Works program is noted and appears to be the most coherent aspect of the strategy based on previous examples successfully implemented elsewhere. However, it is unclear as to who will raise the levy on tenants across the precinct to fund the scheme, and who will administer those funds and coordinate the program.
- In its current form the Strategy suggests multiple artworks, including multiple landmark artworks in a single precinct, and a complex process to achieve them. This is in contrast to an approach where a few key projects are prioritised, with an adequate budget to achieve them at high quality.
- The Strategy lacks a clear rationale for the development and prioritisation of works. It lacks detail on future phases of work, how various framework curators will be engaged and how they will coordinate with privately engaged curators for individual works.
- The Strategy indicates that curators will also assist with the fulfilment of various Connecting with Country and heritage interpretation projects but lacks detail on how that will be facilitated.

Recommendation: The City recommends a developer-funded mechanism, managed by a single authority (TfNSW/TAHE or equivalent) that would allow for the pooling of funds, ensuring a holistic place management approach with oversight of the consultation, planning, delivery, and maintenance of artworks, and addressing the public space in ways that transcend development site boundaries.

Night-time economy

The aspiration for a night-time economy which meets the social and cultural needs of the community is supported by the City.

The Plan of Management section of the Design Guide does not include or refer to any guidance on what should be addressed in a Plan of Management and how they are monitored and reviewed.

Plans of Managements (POMs) are critical compliance documents which address the operational aspects of late-night trading businesses and minimise impacts on neighbouring amenity. They are important documents used by the NSW Police and City of Sydney staff, who may be called to respond to incidents and complaints.

Paras 18-21 of section 17 of the Design Guide do not provide guidance on the content, review and monitoring of these documents. These provisions are required to provide certainty to applicants and ensure that POMs are effective in addressing operational issues and impacts on neighbouring amenity. They should be applied to Central Station without exception.

Section 3.15.5.2 Monitoring and Review and Schedule 3.2 of the Sydney DCP outlines these requirements and should be included within section 17 of the Design Guide.

Recommendation: Include a schedule or include after paragraph 21 of Section 17 Night-time economy of the Design Guide the matters to be addressed in 1(a)-(g) of the Schedule 3.2 of the Sydney DCP 2012.

Include after paragraph 21 of Section 17 Night-time economy of the Design Guide the monitoring and review provisions in section 3.15.5.2 of the Sydney DCP 2012.

The Design Guide currently includes hours for a late-night management area, with extended trading, but does not describe the context and desired character of the late-night management

area. Including a character statement for late-night management areas which describes their desired character, key defining elements, buffer zones, mix of uses, management and trading hours is useful information for applicants that should be incorporated into the Design Guide.

Recommendation: The Design Guide should include an appendix or insert text after Table 17 which provides a character statement for the late-night management area, aligning with the matters included in Schedule 3.1, Section 3.1.1 of the Sydney DCP 2012.

Ownership and governance

Land ownership

The land ownership arrangements at Central Precinct are opaque, with TfNSW and TAHE both being referred to as the landowners within the documentation provided. City of Sydney Councillors made a resolution in June 2022 opposing NSW Government land sell offs through the Transport Asset Holding Entity (TAHE). It is the view of the City that public land should remain in public ownership, to serve public interests now and in the future. A development at Central should be seen as an opportunity to deliver a new precinct which benefits the public through employment growth and the provision of local infrastructure, rather than a capital receipt. On-going land ownership is also important to retain control of and access to state significant infrastructure, namely the station and rail lines. The City seeks reassurance that the 24ha of land within Central precinct will remain in public ownership.

Recommendation: Provide a firm commitment that the 24ha of land within Central precinct will remain in public ownership.

Privately-owned public space

The streets and open spaces created within the development are proposed to be publicly accessible, privately owned spaces. For the precinct to become part of the wider City, it is important that the on-going governance and management of the spaces is considered. It is key that the agency charged with maintaining the space has sufficient resources and experience in public space management.

The City does not support the Codes SEPP proposed amendments to enable temporary events in the public space without the need to obtain a development consent (pp 65-66). If this SEPP amendment were enacted, the City would not be able to ensure appropriate governance of public spaces, and it runs the risk of public space becoming commercialised.

It is also important that the rights and needs of rough sleepers are considered in the design and management of the Precinct, referring to the NSW Protocol for Homelessness People in Public Spaces (NSW 2022).

At a high level, the new spaces created should be managed in a way that makes them feel public and welcoming to all.

Recommendation: More information is needed on the ongoing management and governance of the privately owned public spaces within the proposal.

