

ATTACHMENT C

VIEW ANALYSIS

**188-194A AND 196-208 GEORGE STREET
4 DALLEY STREET AND 1 UNDERWOOD
STREET SYDNEY**

OUTCOMES OF PUBLIC EXHIBITION - DRAFT SYDNEY LOCAL ENVIRONMENTAL PLAN 2005 - AMENDMENT NO. 2 - AND DRAFT CENTRAL SYDNEY DEVELOPMENT CONTROL PLAN 1996 - AMENDMENT NO. 20 - FOR THE BLOCK BOUND BY ALFRED-PITT-DALLEY AND GEORGE STREETS SYDNEY

FILE NO: S062501-5

SUMMARY

In September 2008, the City commissioned the NSW Government Architect's Office to prepare an urban design study (the study) for the block bound by Alfred, Pitt, Dalley and George Streets in central Sydney (the APDG Block). The key purpose of the study was to ensure that Council has a consistent set of planning controls that promote high quality built form and urban design outcomes for both the public and private domain on this important street block.

The study recommended an option for the APDG Block consisting of a large central publicly accessible square, a connected and activated laneway network, and three tower buildings. The key principles driving this recommendation was that additional height would be considered in exchange for significant and quantifiable public domain improvements, and that this would unlock latent capacity within the APDG Block without compromising amenity factors that attract investment and promote job growth in the City. The study's recommended option would operate as an alternative to existing controls in *Sydney Local Environmental Plan 2005*, that is, additional height will be allowed only if owners choose to participate.

The study option identified strategic groupings of sites located within the APDG Block, and proposed controls to enable these sites to develop in a "Development Block" pattern, where additional height will be offered in exchange for public domain improvements. Three Development Blocks were identified, with "Development Block 1" in the south-eastern portion of the APDG Block being characterised by multiple land ownership.

In March 2010, the Council and the Central Sydney Planning Committee endorsed reports recommending the public exhibition of *Draft Sydney Local Environmental Plan 2005 (Amendment No. 2)* and *Draft Central Sydney Development Control Plan 1996 (Amendment No. 20)*, collectively referred to in this report as the "alternative scheme". The alternative scheme incorporated the recommendations of the study and also included controls that reflect the building envelope of the winning entry of the December 2009 architectural design competition held for 1 Alfred Street, (Goldfields House) the north-most site within the APDG Block.

The alternative scheme was publicly exhibited for a period of 28 days from 28 July 2010 to 24 August 2010. Twenty four submissions were received, primarily from owners of sites within the APDG Block, owner/occupants of nearby residential apartments and owners of commercial buildings within the vicinity of the block. The key issues raised included requests for additional development incentives to stimulate development in accordance with the alternative scheme, objections about view impacts to nearby residential and commercial tower buildings and concerns regarding the potential impacts on the character of Circular Quay.

The key outcome arising from the review of submissions is to amend the alternative scheme to permit more of the current floor space allocation available to the Westpac owned site on the northern portion of Development Block 1 to be transferred to the proposed tower envelope on the southern portion of Development Block 1, to the point where no building would be required on the Westpac site. This will facilitate an increase in the area of the proposed central publicly accessible square from approximately 1,200 square metres up to approximately 2,600 square metres. The effect of this larger square will be a significant public benefit above that originally envisioned for the APDG Block.

The proposed change to the exhibited alternative scheme does not constitute an increase in the floor space currently allowed by *Sydney Local Environmental Plan 2005* but is simply a reallocation of existing permissible floor space and requires only a minor technical amendment to the exhibited *Draft Central Sydney Development Control Plan 1996 (Amendment No. 20)* in order to be implemented.

RECOMMENDATION

It is resolved that the Central Sydney Planning Committee:

- (A) note the matters raised in submissions received in response to the public exhibition of *Draft Sydney Local Environmental Plan 2005 (Amendment No. 2)* and *Draft Central Sydney Development Control Plan 1996 (Amendment No. 20)*;
- (B) approve *Draft Sydney Local Environmental Plan 2005 (Amendment No. 2)*, as shown at Attachment D to the subject report, and that it be submitted to the Director-General of the Department of Planning, together with a report prepared in accordance with section 68(4) of the *Environmental Planning and Assessment Act 1979* that outlines the outcomes of public exhibition and a request that the Minister for Planning make the Local Environmental Plan; and
- (C) note the Planning Development and Transport Committee's consideration of the recommendation at their meeting on 8 November 2010 to adopt *Draft Central Sydney Development Control Plan 1996 (Amendment No. 20)*, as shown at Attachment E to the subject report, pursuant to clauses 21 and 22 of the *Environmental Planning and Assessment Regulation 2000*; and that this Development Control Plan comes into effect on the date of gazettal of *Draft Sydney Local Environmental Plan 2005 (Amendment No 2)*.

ATTACHMENTS

- Attachment A:** Resolution of Council of 15 March 2010 and Resolution of the Central Sydney Planning Committee of 11 March 2010
- Attachment B:** Section 65 Certificate and correspondence from the Department of Planning - 14 July 2010
- Attachment C:** Table - Summary of submissions
- Attachment D:** Draft Sydney Local Environmental Plan 2005 (Amendment No. 2)
- Attachment E:** Draft Central Sydney Development Control Plan 1996 (Amendment No. 20)
- Attachment F:** View Study Extracts

BACKGROUND

1. In September 2008, the City commissioned the NSW Government Architect's Office to prepare an urban design study (the study) for the block bound by Alfred, Pitt, Dalley and George Streets, which is located in Central Sydney at Circular Quay (the APDG Block). The key purpose of the study was to ensure that Council has a consistent set of planning controls that promote high quality built form and urban design outcomes for both the public and private domain on this important street block. The planning controls that currently apply to the APDG Block were considered to be inadequate and required amendment in order to achieve better planning outcomes and to promote attractive development opportunities.
2. The study was completed in May 2009 and recommended a preferred option for the APDG Block, consisting of a large central open publicly accessible square, a connected and activated laneway network and three tower buildings. A key principle driving this recommendation was that additional height would be considered in exchange for significant and quantifiable public domain improvements, that is, that an incentive based approach would be applied to development controls to promote desirable planning outcomes.
3. The study's preferred option identified three strategic groupings of sites located within the APDG Block and proposed controls to enable these sites to develop in a "Development Block" pattern, where additional height, that is, greater than the maximum height of 110 metres currently allowed by *Sydney Local Environmental Plan 2005* (SLEP2005), is offered in exchange for public domain improvements. In order to achieve the maximum height in one part of a Development Block, floor space from another part of a block would need to be transferred, thus freeing up that part of the block for the public domain.
4. The Council and the Central Sydney Planning Committee (CSPC), at meetings on 1 June 2009 and 28 May 2009 respectively, considered the recommendations of the study and resolved to commence the process to amend SLEP2005 to include the preferred option provided in the study as an alternative to existing development controls in SLEP2005. Council and the CSPC also resolved to amend relevant sections of the *Central Sydney Development Control Plan 1996* (DCP1996) in support of the LEP amendment.
5. In July 2009, the City received notification from the Director-General of the Department of Planning (the Department) to prepare the draft LEP. The Department's notification supported Council's contention that the current planning controls for the site have resulted in an inadequate built form and public domain outcome and agreed that new development controls are required to improve this situation.
6. Public authority consultation was undertaken in August/September 2009, in accordance with the former section 62 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). No objections were raised to the LEP amendment proceeding and submissions were generally supportive of the proposal.

7. As part of the preparation of the amendment to SLEP2005, an economic analysis was undertaken by Preston Rowe Paterson National Property Consultants (PRP) to determine if the study's preferred option and proposed draft LEP controls will work from an economic perspective and, if not, whether additional development incentives other than height will be required to trigger redevelopment in accordance with the study scheme. The PRP analysis found that redevelopment in accordance with the study is most likely to occur in the medium term, that is, by 2014, without the need for further development incentives. In any case, due to the time frames associated with tower developments it is unlikely that development would occur in accordance with the study scheme prior to 2014.
8. It is noted that the *City of Sydney Capacity Study 2008* shows that although there is floor space capacity to allow for jobs growth in the medium term, there are barriers within existing planning controls which inhibit available floor space being realised, as exemplified by the APDG Block. The APDG Block proposal allows for this capacity to be "unlocked" without compromising the amenity factors that attract investment and jobs growth in the City.
9. In March 2010, the Council and the CSPC considered reports recommending the public exhibition of *Draft Sydney Local Environmental Plan 2005 (Amendment No. 2)* (the draft LEP) and *Draft Central Sydney Development Control Plan 1996 (Amendment No. 20)* (the draft DCP). In this report the draft LEP and draft DCP are referred to collectively as the "alternative scheme".
10. The alternative scheme incorporated the provisions of the preferred option recommended in the study. It also included controls that reflected the building envelope of the winning entry of the December 2009 architectural design competition held for the 1 Alfred Street (Goldfields House) site. The winning design from Kerry Hill Architects (the KHA scheme) is based on the building envelopes recommended in the study, as well as earlier Council and CSPC resolutions which allowed for the redistribution of height on this site.
11. The Council and CSPC adopted the recommendations of the reports on 15 March 2010 and 11 March 2010, respectively, to enable the public exhibition of the alternative scheme and to seek certification from the Department to publicly exhibit the draft LEP. A "Section 65 Certificate" was received from the Department in July 2010 allowing exhibition of the draft LEP. The resolutions are at Attachment A and the Section 65 Certificate is at Attachment B of the report.
12. *Draft Sydney Local Environmental Plan 2005 (Amendment No. 2)* and *Draft Central Sydney Development Control Plan 1996 (Amendment No. 20)* (ie, the alternative scheme) were publicly exhibited for a period of 28 days from Wednesday 28 July 2010 to Tuesday 24 August 2010. Details and outcomes of the public exhibition are discussed in the public consultation section of this report.
13. It is noted that following review of the draft LEP from Parliamentary Counsel, the exhibited draft LEP differed slightly to that considered by the Council and CSPC in March 2010. The key difference is that maps showing building heights and development blocks were removed from the draft LEP and incorporated into the draft DCP. The reason for this was to allow provisions to be better incorporated into the future City Plan LEP. The changes were considered technical and did not alter the intent of the draft LEP, nor alter the potential built form outcome for the APDG Block, as endorsed for exhibition by both Council and the CSPC.

14. It is also noted that the draft LEP has been progressing under the former Part 3 of the EP&A Act, given the date the formal statutory plan-making process commenced. If the CSPC approves the draft LEP, it is intended to submit to the Director-General of the Department the draft LEP and a report outlining the outcomes of public exhibition prepared in accordance with the former 68(4) of the EP&A Act.

KEY IMPLICATIONS

Draft Sydney Local Environmental Plan 2005 (Amendment No 2)

15. The draft LEP, as exhibited, proposes a new clause 52A in SLEP2005 which aims to facilitate the following development scenarios within the APDG Block:
 - (a) a publicly accessible central open space linked to surrounding streets by a network of lanes and through site links;
 - (b) two new commercial office towers, one in the south-east corner, of a maximum 200 metres in height, and one on the western side fronting George Street, of a maximum 155 metres in height; and
 - (c) a thin residential tower in the north-west corner, fronting Circular Quay, of a maximum 185 metres in height.
16. The exhibited draft LEP is intended to operate as an alternative to existing controls in SLEP2005. Additional height is allowed only if owners choose to participate in the alternative scheme. If they do not, then existing height controls in SLEP2005 would continue to apply. In other words, the draft LEP is not amending existing height controls in SLEP2005, rather, it is allowing additional height in exchange for significant public domain benefits.
17. Three Development Blocks, that is Development Blocks "1", "2" and "3" are proposed by the exhibited draft LEP, including sites that can act as "Optional Additions" to the Development Blocks, which may potentially increase the site area of a Development Block. The Development Blocks must be developed as a whole in order to achieve any additional height above the existing height control in SLEP2005. No additional floor space allocation above that allowed by SLEP2005 is proposed. However, equity of developable area, being FSR, will be maintained for all sites. Floor space is allocated across the identified Development Blocks, rather than on individual sites. Therefore, in order to achieve the maximum height on one part of a Development Block, floor space from another part of the block must be transferred, thus freeing up that part of the block for the public domain.

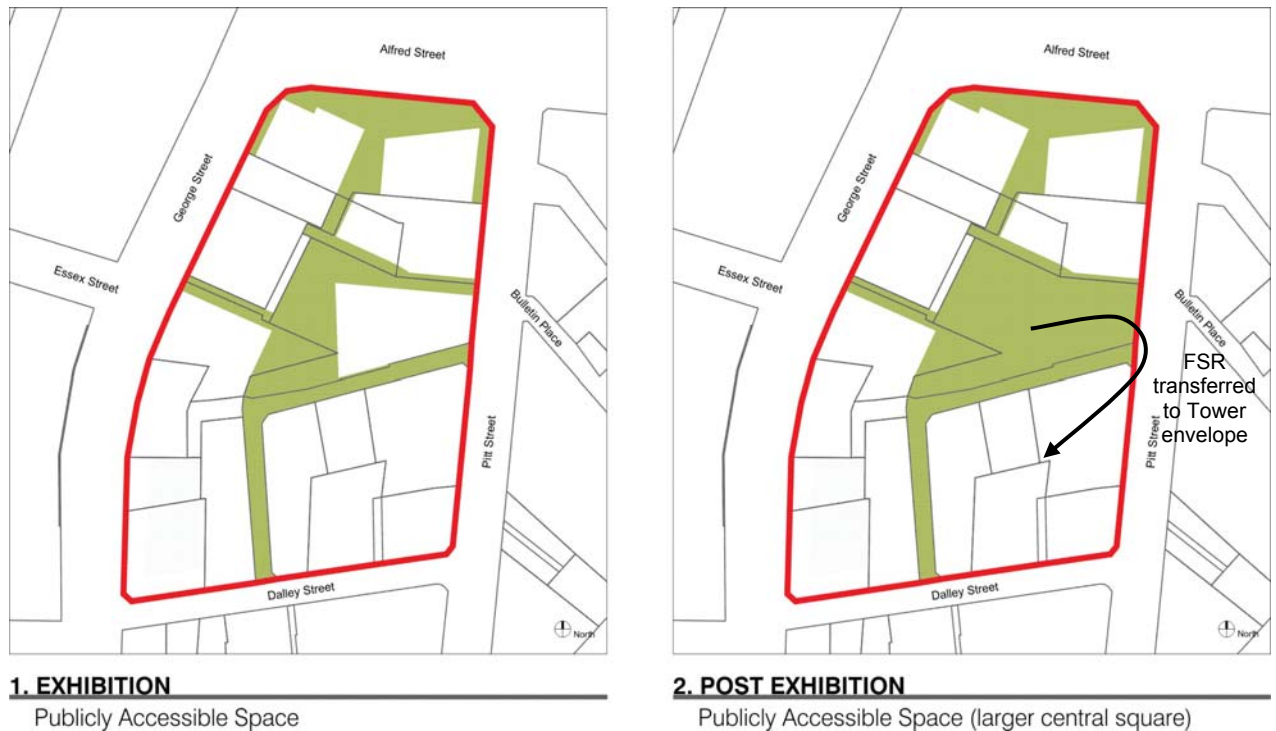
Draft Central Sydney Development Control Plan 1996 (Amendment No. 20)

18. To support the controls in the draft LEP, amendments are proposed to DCP1996 to ensure that the Council has a consistent set of planning provisions for the APDG Block.
19. The key amendment proposed by the draft DCP is to expand section "2.12 - Design Guidelines for Significant Sites" in DCP1996 to include detailed provisions with respect to future development on the APDG Block, consistent with the draft LEP. The DCP provisions will only apply if the associated LEP provisions are triggered, that is, if proponents opt to use the alternative controls as provided by the draft LEP.

Public exhibition

20. The draft LEP and draft DCP were exhibited concurrently for a period of 28 days from 28 July 2010 to 24 August 2010.
21. Twenty eight (28) submissions were received in response to the public exhibition. Submissions were primarily from owners of sites within the APDG Block, owner/occupants of nearby residential apartments and owners of commercial buildings within the vicinity of the block. Issues raised in submissions, and the City's response to these issues, are addressed in detail in the submissions table at Attachment C of this report. The key issues raised are discussed in the public consultation section of this report below.
22. The key outcome arising from the public exhibition is minor amendments to the provisions of the draft DCP to allow all of the floor space permissible on the Westpac owned site on the northern portion of Development Block 1 to be transferred to the proposed tower envelope on the southern portion of Development Block 1, to the point where no building would be required on the Westpac site. This will facilitate an increase in the area of the proposed central publicly accessible square of approximately 1,200 square metres. This change does not constitute a floor space bonus but is simply a reallocation of existing permissible floor space under SLEP2005. Diagram 1 below shows the potential increase in publicly accessible space on the APDG site resulting from more floor space being transferred from the Westpac site.

Diagram 1 – Potential increase in publicly accessible space resulting from additional floor space transfer



23. Some minor amendments have also been made to the alternative scheme arising from specific requests in submissions. The main change is that draft DCP Figure 2.69, that is the height control envelope for the 1 Alfred Street site, and draft LEP clause 3(b)(iv) have been amended to reflect a minor revision to the footprint of the Kerry Hill Architects scheme 185 metre tower envelope. Since winning the competition in November 2009, Kerry Hill Architects have undertaken detailed design development work, resulting in some minor changes to the building envelope. As a result, there has been a slight increase to the 185 metre building footprint to 24% of the site area instead of 21% as exhibited in the draft LEP. The City has assessed any additional view and overshadowing impacts resulting from this change and considers them to be acceptable.
24. No other amendments are proposed to the draft LEP, as exhibited, other than a minor technical error relating to the legal description of 33-35 Pitt Street (the Westpac owned site). The draft LEP and the amended draft DCP, as recommended for adoption by this report, are at Attachment D and Attachment E respectively.

Strategic Alignment - Sustainable Sydney 2030 Vision

25. The City of Sydney is the engine room of the State's economy and a significant contributor to the Nation's economy, generating 24% of the State's and 8% of the Nation's gross domestic product (GDP). The Central Sydney area alone is the location of around 214,000 jobs. So that Central Sydney can continue with this important economic function, it must have capacity to grow. However, this growth must not compromise the key amenity factors that attract investment and jobs growth in the City. Balancing these key issues is highlighted in the City's *Sustainable Sydney 2030* vision and the State's Metropolitan Strategy "*City of Cities: A Plan for Sydney's Future*" and *Draft Sydney City Subregional Strategy*. The *City of Sydney Capacity Study 2008* shows that while there is a floor space capacity to allow for jobs growth in the medium term, it recognises there are barriers within and outside of the planning controls to enable this floor space to be realised.
26. To address the above issues, improve urban design outcomes and "unlock" capacity, the City has identified the APDG Block as a strategic site where additional height could be offered in exchange for significant and quantifiable public domain improvements.

RELEVANT LEGISLATION

27. *Environmental Planning and Assessment Act 1979*.
28. *Environmental Planning and Assessment Regulation 2000*

CRITICAL DATES / TIME FRAMES

29. If the alternative scheme is supported, this will positively influence the development outcome for the Valad owned site at 1 Alfred Street. Valad have indicated that a development application (DA) is likely to be lodged before the end of 2010 in accordance with the Kerry Hill Architects scheme referred to earlier in this report. It is considered that the progression of this DA is an important first step in achieving the vision for the APDG block and the realisation of the City's intended planning direction for this street block, as envisaged in the alternative scheme. Should Council and the CSPC resolve to progress the draft LEP and draft DCP, this will provide some degree of certainty for this site's owner and the future character of the entire APDG Block.

PUBLIC CONSULTATION**Public exhibition**

30. The draft LEP and draft DCP were exhibited concurrently for a period of 28 days from 28 July 2010 to 24 August 2010.
31. Notification of the draft controls (the alternative scheme) included:
 - (a) advertisements in the Sydney Morning Herald and Central newspapers;
 - (b) approximately 550 notification letters sent to all land owners within a 100 metre radius of the boundary of the APDG Block, as well as land owners within the block;

- (c) notification on the City of Sydney website; and
 - (d) notification posters at the City's Neighbourhood Centres.
32. During the exhibition period a planning package was made publicly available in electronic form on the City's website and in hard copy at Town Hall House and all of the City's Neighbourhood Centres. This planning package included:
- (a) *Draft Sydney Local Environmental Plan 2005 (Amendment No 2)*;
 - (b) *Draft Central Sydney Development Control Plan 1996 (Amendment No. 20)*;
 - (c) maps illustrating development blocks, alternative heights and publicly accessible space;
 - (d) Economic Analysis: Floor Space Transfer Recommended in the Alfred, Pitt, Dalley and George Streets Site Urban Design Study prepared by PRP;
 - (e) APDG Urban Design Study prepared by the Government Architect's Office;
 - (f) 1 Alfred Street Urban Design Report prepared for the owners of the 1 Alfred Street site;
 - (g) a written statement, prepared in accordance with the Best Practice Guideline, titled, "LEPs and Council Land – Guideline for Councils using delegated powers to prepare LEPs involving land that is or was previously owned or controlled by Council"; and
 - (h) other exhibition documentation required by the EP&A Act and its Regulation.
33. As previously noted in this report, 28 submissions were received in response to public exhibition.

Key issues raised in submissions

ISSUE - Requests for additional development incentives from land owners within the APDG Block

34. Two submissions from key landowners within the APDG Block (Westpac and GE Real Estate Investments) consider that height alone is unlikely to provide sufficient incentive to stimulate development in accordance with the alternative scheme. Their submissions suggest a number of additional incentives to height that the City should consider to further stimulate development on "Development Block 1", which is characterised by multiple ownership.

Westpac submission

35. A key concern to Westpac is that the achievement of the alternative scheme is dependent upon the transfer of potential floor space area from the Westpac site to the southern portion of Development Block 1, that is, the portion that includes sites owned by the City of Sydney, GE, Telstra and Energy Australia. Westpac consider that there is currently insufficient incentive for them to "opt in" to the alternative scheme since they can already develop their site to their advantage, independent of the scheme.

36. Westpac consider that the benefit of the alternative scheme to them is marginal, as well as to two other landowners located within Development Block 1 – Ringmer Pacific and The Rugby Club. This is because Westpac, The Rugby Club and Ringmer Pacific are likely to benefit from northern harbour views above a height of 55 metres resulting from the future development of the 1 Alfred Street site under the alternative scheme. Westpac argue that they could therefore develop under the existing planning controls on their current land holding, or on a combined Westpac, Rugby House and Ringmer Pacific site. Therefore, they argue, the alternative scheme may in actuality encourage them to develop their site independently of the alternative controls.
37. Westpac therefore suggest a number of possible additional development incentives, other than height, that are likely to encourage them to participate in the alternative scheme. These include:
- (a) permit Westpac's transferred floor space potential to be calculated at an FSR of 14:1 (as is currently applicable to residential development in SLEP2005) instead of an FSR of 12.5:1, as currently applies to commercial development. This is effectively a floor space bonus of 1.5:1 or
 - (b) reduce the size of the building envelope proposed on the Westpac site to create a larger central square. This would allow for more of Westpac's floor space potential to be transferred into the towers on Development Blocks 1 and/or 2. Westpac consider that both of the towers have the potential within the proposed envelopes to accommodate more floor space and that transferred floor space is likely to yield higher returns to Westpac; or
 - (c) exempt Westpac from the purchase of heritage floor space (HFS). Westpac consider that it is reasonable to exempt the purchase of HFS for transferred floor space since the creation of the internal public square provides a comparable material public benefit to the purchase of HFS; or
 - (d) consolidate 182 George Street into one of the development blocks. This would become possible to transfer the current floor space entitlement into a larger development site which could create opportunities to deliver public domain improvements.

GE Real Estate Investments (GE) submission

38. Notwithstanding the City's view that height incentives should be sufficient to encourage amalgamation in an improved economic market beyond 2014, GE considers that there is sufficient caution in the economic analysis report prepared by PRP that height alone may not be sufficient incentive for the desired built form.
39. GE considers that an additional FSR incentive will promote site amalgamation and make redevelopment of the block more viable in the current economic climate. As a result, GE has recommended that the City consider an FSR bonus of 2:1 for sites where floor space is earmarked to be "exported" to another "importing" site, that is, sites on the northern portion of Development Block 1 are "exporting" sites and southern sites are "importing" sites. GE consider that past and current Central Sydney planning controls demonstrate that FSR incentives can be utilised as a catalyst to achieve specific planning policies and within a relatively short space of time and that a bonus of 2:1 would not be a significant departure from previous practice.

40. The proposed FSR bonus would only be available if bonus floor space is accommodated within the envelopes nominated on the recipient “tower” sites and would only be granted for proposals consistent with the amalgamation approach of the alternative scheme. GE suggests that the incentive could be time-limited so as to provide an impetus for development in the short term. GE have undertaken a preliminary analysis based on the proposed 2:1 FSR bonus. Their analysis indicates that the bonus floor space may be largely accommodated within the identified podium and tower forms (as per the alternative scheme) in Development Block 1.
41. In order to influence utility providers located within Development Block 1, that is, the Telstra and Energy Australia sites on the southern portion of Development Block 1, to participate in the alternative scheme, GE also recommends that these utility sites are excluded from the calculation of floor space area. GE consider that this would further encourage amalgamation since they would be difficult and expensive to relocate or incorporate into new development.

RESPONSE

Preferred option - change the proposed building envelope controls for the Westpac site to achieve a larger central square

42. Following a review of the suggested additional development incentives from Westpac and GE, the City’s preferred option is to permit the transfer of all currently permissible floor space from the Westpac site to the southern tower and podium on Development Block 1.
43. In effect, this would allow for a reduction in the size of the building envelope on the Westpac site proposed by the alternative scheme, to the point where no building is required and facilitate a larger central square of approximately 2,600 square metres – over 1,200 square metres larger than currently proposed by the alternative scheme. In order to facilitate this outcome, some minor technical changes would be required to the provisions of the draft DCP. The preferred option is considered to be a desirable outcome since it is consistent with, and improves a basic principle of, the alternative scheme - to provide significant and quantifiable public benefit through coordinated redevelopment.
44. The suggested bonus FSR incentives, HFS exemption and floor space exemptions for utilities as described above are not proposed to be incorporated in the alternative scheme. These incentives are unlikely to be necessary within the context of the PRP Report which concludes that additional height is likely to be sufficient incentive in the medium term. Also, unlike the preferred option which provides an opportunity for a substantial increase in the area of the central square, other suggested incentives do not provide for any significant additional public benefit.

Economic analysis - sufficient incentive by 2014

45. The PRP economic analysis concluded that as economic and market conditions improve, the height increases suggested by the alternative scheme for each of the three development blocks will most likely incentivise site amalgamations, given that the land value for redevelopment will exceed current built form value in the medium term. Although it was acknowledged that some kind of development incentive (in addition to height) may be used to trigger development in the short term, that is, prior to 2014, the PRP Report considered that property owners are most likely to take up the alternative scheme in the medium term. As a result, additional development incentives, such as an FSR bonus, would be unnecessary since market conditions are likely to substantially improve in a 5-10 year time horizon.
46. The submissions from Westpac and GE have not provided any supporting substantive economic evidence or analysis that demonstrates that additional incentives will be required. It is therefore not possible for the City to evaluate their requests for additional floor space incentives (other than the preferred option) in any thorough and meaningful way, other than within the context of the detailed analysis within the PRP Report. Although it is acknowledged that further incentive of some kind may be necessary to stimulate development in the current economic and real estate climate, it is considered that there is no urgency to do so, particularly as there is sufficient commercial capacity currently available in Central Sydney. The City's 2008 Capacity Study conservatively estimates that within Central Sydney the current additional capacity, that is, the amount of floor space above that which is already constructed if developable properties went to the maximum FSR amount allowable under SLEP2005, to be at 1,290,320 square metres, or approximately 15-18 years supply, depending on rate of net absorption.

Feasibility of a larger central public square

47. The City has reviewed the preferred option, that is, a reduction in the size of the building envelope on the Westpac site to the point where no building would be required, to determine if the floor space currently available to the Westpac site under SLEP2005 could be accommodated within the building envelope of the southern tower and podium, as is permitted by the alternative scheme. This review found that this floor space could be fully accommodated within this building envelope with sufficient capacity remaining in the envelope to also accommodate the excess floor space from the three proposed "Optional Addition" sites, that is, the Rugby Club, Ringmer Pacific and Telstra sites.
48. This review demonstrated that a larger central square is achievable within the current built form parameters of the alternative scheme and is therefore a realistic outcome. An advantage of this approach is that the additional transferred floor space would not result in a built form outcome that is inconsistent with the amalgamation approach intended by the alternative scheme.
49. The City's review also found that if a floor space bonus of 1.5:1 or 2:1 was applied to the Westpac site, the total floor space available could also possibly be accommodated within the desired southern tower and podium envelope. However, this increased amount of available floor space is likely to "fill in" the tower envelope so that it approaches its full capacity. This is an undesirable scenario in that it would undermine the potential for flexibility in building design and architectural expression.

50. Importantly, the City's review found that as more floor space is made available to the southern tower and the envelope approaches capacity, the likelihood of the "Optional Additions" on Development Block 1 participating in the alternative scheme diminishes.
51. The City's review indicates that the introduction of the requested floor space bonus to the Westpac site would effectively preclude the optional additions from participating in the alternative scheme, particularly in the case of achieving the preferred larger square. The City's review found that a bonus of 2:1 applied equally to all "export" sites, as recommended in the submission from GE, is likely to create a "pool" of floor space that exceeds that which can be accommodated by the desired building envelopes on Development Block 1, including the preferred option of the larger central square. In essence, this scenario would essentially eliminate any possibility of achieving a larger central square. Unlike the provision of a larger central square, the introduction of the FSR bonus and exemption incentives suggested will offer little, if any, additional public benefit above that which is currently proposed in the alternative scheme.
52. It is noted that GE have lodged a supplementary submission requesting a floor space bonus of up to 4:1 for the Westpac site and for "Optional Addition A" (the Rugby House site). This followed the recent submission of a DA for the Ringmer Pacific site that has been prepared in accordance with existing planning controls.
53. There may be some merit in consolidating 182 George Street (which is also owned by Westpac) into the alternative scheme, as the incorporation of this site may create some additional public domain opportunities. However, the additional floor space available from this site (if incorporated) may inhibit opportunities for "Optional Additions" from participating in the alternative scheme and also potentially undermine the City's preferred option of a larger central square discussed earlier in this report. The exclusion of utilities from the calculation of floor area, as requested by GE, is likely to lead to a similar scenario.

Alternative development block or floor space transfer options

54. As raised in submissions from Westpac and GE, alternative floor space transfer mechanisms and/or alternative development block arrangements may be possible within the APDG site south of the 1 Alfred Street site. The City is open to the consideration of such alternatives on their merits, particularly if it can be demonstrated that alternative approaches can result in public benefits and high quality urban design outcomes similar to the alternative scheme. Consideration of alternative development scenarios which result in significantly different built form outcomes would be subject to a separate Planning Proposal, or LEP amendment, process.
55. It is noted that the possibility of alternative options has already been recognised - early in the planning process a number of built form scenarios were considered for the APDG site during the preparation of the APDG urban design study. It is therefore acknowledged that there may be other scenarios for the APDG Block that are yet to be explored.

ISSUE - View Impacts

56. Several submissions from owners and/or occupiers of three tower buildings in the vicinity of the APDG Block, that is, Grosvenor Place, Australia Square and Cove Apartments, have raised concerns about the impacts of the alternative scheme on existing views, particularly to Sydney Harbour, the Sydney Opera House and the Harbour Bridge. Amongst other things, all submissions consider that there will be a significant reduction in both residential and office property values resulting from view loss.

View Impacts - Grosvenor Place (205-227 George Street)

57. The submission from the owners of Grosvenor Place considers that view impacts will be twofold – that the alternative scheme will significantly impact on both the view out of the northern floor-plate of the Grosvenor Place building and the visibility of the building within Central Sydney's Skyline. The submission considers that the primary view impacts will be generated by the increased building heights proposed for the 1 Alfred Street site and that the impacts arising from the tower cannot be justified as there are considerably greater adverse effects than benefits from the redevelopment of this site in accordance with the alternative scheme.
58. A detailed view analysis has been submitted by the owners of Grosvenor Place in support of their submission. This analysis compares the view loss that would result from the current height controls in SLEP2005, that is, a potential block development of the entire APDG Block to 110 metres, with the envelopes permitted by the alternative scheme. The owners have also submitted an alternative scheme for the 1 Alfred Street site. This scheme proposes alternative massing which essentially shifts the proposed tower form from the western to the eastern side of the site and reduces its height to 140 metres with a 35 metre podium.
59. In summary, the submission from Grosvenor Place considers that the key view impacts will be:
- (a) Development Block 1 & 2 building envelopes will obliterate all views to the east;
 - (b) the Development Block 2 envelope will obliterate significant harbour views including the Opera House above Level 34 of Grosvenor Place;
 - (c) the Development Block 3 envelope will obliterate significant harbour views including the Opera House from the central part of the building above Level 34 of the entire eastern side of Grosvenor Place; and
 - (d) the Development Block 3 envelope will affect significant harbour views including the Opera House from the western side of the building between levels 34 and 40.

View Impacts - Cove Apartments (129 Harrington Street)

60. A key issue raised in submissions from owner/occupants of Cove Apartments is view loss to Sydney Harbour. Similar to the submission from the owners of Grosvenor Place, the primary impacts will result from the proposed 1 Alfred Street building envelope.

61. In summary, key matters raised in relation to view loss include:
- (a) there will be a loss of water views, particularly to the east;
 - (b) the alternative scheme will diminish the amenity of residents and negatively affect the value of apartments that suffer from view loss;
 - (c) views play a vital role in terms of amenity, due to the generally smaller living spaces found in City living; and
 - (d) residents and potential purchasers should be able to rely on existing height limits in SLEP2005 to remain and apartment purchases have been predicated on the maintenance of existing height restrictions.

View Impacts - Australia Square (264 – 278 George Street)

62. Australia Square currently has views towards Circular Quay through a view corridor between Grosvenor Place and the “Gateway” building. The submission contends that this view corridor is likely to be affected by the alternative scheme since the corridor is located over the APDG Block. The upper floors of Australia Square currently enjoy north-facing views towards Circular Quay, the Harbour Bridge, Sydney Cove and Lower North Shore, which will be adversely impacted.

RESPONSE

63. In order to determine the extent of view loss, the City undertook a review of the view impacts on Grosvenor Place, Australia Square and Cove Apartments. In the case of Grosvenor Place and Australia Square, the City undertook its own view modelling to determine impacts. Impacts on Cove Apartments were based on the view analysis on pages 43 to 47 of the 1 Alfred Street urban design report that was exhibited to support the draft LEP and draft DCP. Extracts of the City’s view modelling are at Attachment F.
64. Similar to the analysis submitted by the owners of Grosvenor Place, it was assumed a potential block development of the entire APDG Block to 110 metres and that there is already potential view loss as a result of the current height controls. Therefore, the City’s assessment focused on impacts in excess of the current building envelopes that may be achieved under existing controls in SLEP2005.
65. The City’s review found the potential view loss from buildings to be as follows:
- (a) Grosvenor Place - Key impacts will be at centre and right viewpoints at the upper levels of the building. In these positions the key view loss will arise from the proposed tower on 1 Alfred Street which impacts on views to Sydney Harbour and obstructs views to Sydney Opera House. Proposed building envelopes on Development Block 1 and 2 will lead to significant view loss to the east and some loss of views of Sydney Harbour. Sydney Opera House will mostly remain in full view at upper levels on the left hand side of the building levels. Views from Grosvenor Place to the west of the Sydney Opera House, including the “iconic” view to the Sydney Harbour Bridge, will not be impacted. At lower levels view impacts to Sydney Harbour will be minimal, as building massing permitted by existing controls in SLEP2005 already largely affects views.

- (b) Cove Apartments - View impacts at lower levels are negligible, as building massing permitted by existing controls in SLEP2005 already largely affects views. At upper levels there will be some loss of “amenity” views towards Cremorne Point, Ashton Park and east along Sydney Harbour. “Iconic” views of Sydney Opera House will not be lost.
- (c) Australia Square - At upper levels there will be a loss of views of Sydney Harbour and the Harbour Bridge within the corridor above the APDG Block. However the “iconic” views to the Sydney Opera House are likely to be retained, as will existing amenity and contextual views east and west of the corridor above the APDG Block between Grosvenor Place and the Gateway building. It is noted, however, that the height limit in SLEP2005 for sites immediately to the north of Australia Square is 235 metres. Development in accordance with this existing control would likely obstruct northern views within the corridor above the APDG Block.
66. Although it is acknowledged that there will be some view loss resulting from the alternative scheme building envelopes, the impact of view loss described above is acceptable when considered within the context of the matters discussed below. View impacts to the skyline are discussed elsewhere in this report.
67. Provisions of DCP1996, Sections 6.1.11 and 6.1.12 – Sections 6.1.11 and 6.1.12 of DCP1996 state the following with respect to “outlook” and “views”:
- “6.1.11 - The design of residential buildings and serviced apartments should ensure the provision of outlook, as distinct from views, from all dwelling units. Outlook is considered to be a short range prospect, such as building to building, while views are more extensive or long range to particular objects or geographic features;*
- 6.1.12 - There is no guarantee that views or outlooks from existing development will be maintained.”*
68. Although these DCP1996 provisions relate specifically to residential uses, they can reasonably also be applied to commercial buildings within the context of Central Sydney. It is apparent from these provisions that the protection of “outlook”, as opposed to “views”, is given greater weight as a measure of amenity. Therefore, view impacts are considered minor as only long range views will be affected by the alternative scheme.
69. It is considered that the notion of “view sharing” is embedded in section 6.1.1.12 of DCP1996. Within the context of Central Sydney, where high rise built form is commonplace, there would be a reasonable expectation that new development will be characterised by tower forms and that a partial loss of views resulting from nearby development cannot be fully mitigated.

70. Public benefit of the alternative scheme – Section 1.1 of DCP1996 – “*The purpose of this development control plan*” clearly recognises the importance of public benefits in that one of its two key aims is to “*protect and enhance the public domain*”. Within this context, it is considered that public domain benefits that may eventuate from the alternative scheme outweigh the costs to private interests, that is, view loss. It is noted that Section 2.8 of DCP1996 includes provisions identifying significant views in the Sydney CBD to be protected from encroachment. The identified views are all based on the protection of views from the public domain, reaffirming the position that views from the public domain have primacy over private views. Objections received in relation to view impacts primarily relate to impacts from the private domain, in particular, commercial uses that are likely to have lower order amenity requirements than the public domain.
71. Opportunities for economic growth – The view impacts have also been evaluated within a wider economic context. The APDG Block offers an opportunity for significant investment that can reinforce the perception and role of Sydney as a global city. This is already evidenced by the winning design of the 1 Alfred Street design excellence competition. The long-term benefits to the NSW economy and employment resulting from development on the APDG Block is likely to be substantial and this potential economic benefit is considered to outweigh the potential costs of view loss that may be experienced by nearby landowners. It is therefore considered unreasonable, in the case of the APDG Block, for issues of partial view loss to inhibit or suspend development which is likely to have broader positive economic implications, such as investment and job growth.
72. Alternative design to 1 Alfred Street is unnecessary – The City’s assessment of view impacts shows that buildings subject to view loss from the alternative scheme will substantially retain existing views, that is, that their views will only be partially impacted. One of the key principles underlying the alternative scheme is to promote view sharing. This is by virtue of controls that require towers to appear slender in elevation and appropriate tower separation. This is reflected by the proposed tower on the 1 Alfred Street site, which through its design, will in fact have lesser impact than the building envelope originally proposed in the APDG urban design study. This design is consistent with the notion of “view sharing” and a redesign would, at this advanced stage in the planning process, be both unreasonable and unnecessary.

ISSUE - Impact on the Character of Circular Quay

73. A number of objections consider that the building envelopes permitted by the alternative scheme will have a negative impact on the character of the Circular Quay precinct.
74. In summary, the key concerns raised are that the alternative scheme:
- (a) will erode the predominant building line that has been established for buildings fronting Circular Quay and will set an undesirable precedent;
 - (b) will allow for a mass of very high buildings in close proximity that will promote tower crowding;
 - (c) will impact on view corridors that currently allow for glimpses of more distant towers, such as Australia Square, and erode the character of Circular Quay;

- (d) will allow for an incongruous building form on the 1 Alfred Street site, which will have an impact on Herald Square and the Ringmer Pacific site to the south. The tower is considered to depart from the established controls in SLEP2005 and DCP1996 that seek to maintain and reinforce the creation of quality public places through a street-front building and setback tower typology;
- (e) the 1 Alfred Street site's only contribution to the alternative scheme is a north/south laneway link, which can be provided under the current controls;
- (f) will impact on the existing amenity of the Ringmer Pacific site. Modifications are sought to the height and setbacks that are permitted by the alternative scheme, particularly, the proposed eastern building proposed on the 1 Alfred Street site;
- (g) will impose a physical barrier between the harbour and the city giving the appearance of a "wall", in contrast to the current varied building heights which provide dimension and depth to the cityscape; and
- (h) is unsatisfactory compared to the original plan for the 1 Alfred Street site, as envisioned in the Government Architect Office's urban design study, in terms of height, scale and visual presentation. An appropriate alternative solution would be to place smaller buildings at the front of the APDG Block, with a gradual increase in height towards the back.

RESPONSE

75. The alternative scheme provides an opportunity to supplant the existing poor quality built form currently situated on the APDG Block, which fails to connect physically and visually with Circular Quay and undermines its character. The alternative scheme will also enhance the quality of the city skyline, as viewed from a range of vantage points in Sydney. Contrary to the assertions outlined above, the alternative scheme is consistent with and enhances Circular Quay's character as follows:

Consistent with the existing distribution and height of buildings

76. The alternative scheme is compatible with the predominant surrounding land uses, which are office towers of significant heights. There is a weak pattern to the distribution of buildings fronting Circular Quay as evidenced by existing tall buildings, such as "Gateway" and 1 O'Connell Street, which have clearly compromised the notion of a consistent building line of 110 metres. As shown in the skyline analysis in the APDG urban design study (that was exhibited in support of the alternative scheme), a planned low rise valley to be viewed from Circular Quay, as envisaged in the 1971 City of Sydney Strategic Plan, has not eventuated.
77. The proposed building envelopes on the APDG Block are consistent with the existing building heights immediately to the south of Circular Quay, in particular, the cluster of towers broadly to the west of the APDG Block, which also includes Grosvenor Place and Cove Apartments. There is a distinct step upwards in building height south of Circular Quay and The Rocks, where the predominant building form is characteristically low rise. The northern part of Central Sydney is characterised by a high density of tall towers and the built form proposed on the APDG Block does not represent a departure from this character.

Minimal impacts on view corridors

78. Due to the tall, slender character of the three tower envelopes proposed by the alternative scheme, the impacts on view corridors will be minimised, since new development is likely to open up views that were previously blocked. The existing controls that apply to the APDG Block potentially allow for 6-7 towers, all at 110 metres. The alternative scheme limits the potential for tower crowding and improves view-sharing. Although views to distant towers will be partially obscured from certain vantage points, the alternative scheme will effect opportunities for views to new “iconic” towers that reinforce Sydney’s status as a global city. This is already exemplified by the KHA proposal for 1 Alfred Street, which is likely to enhance Sydney’s tower iconography when viewed from the Harbour.

Appropriate interface with Circular Quay

79. The proposed development on the 1 Alfred Street site is not considered to be a significant departure from the podium/setback tower typology in DCP1996. The KHA scheme assumes a transition in architectural expression at lower storeys and needs to be read in conjunction with the lower boundary of the eastern building, thus presenting as a modulating form similar to that of the “Gateway” building. Preliminary renderings of the KHA scheme also propose design features that can moderate impacts at the interface of Herald Square and reinforce the street edge. It is noted that the strategy for street frontage heights in section 2.2 of DCP1996 allows for flexibility in terms of podium development, stating that:

“There is no requirement to provide a ‘podium’ style building with floor space fully occupying all the lower levels across the entire site. Design flexibility is available for tower form buildings.”

80. The resultant publicly accessible space on the forecourt of the 1 Alfred Street site will in fact complement Herald Square, particularly as this forecourt covers a significant area of the site and provides an opportunity for a visual and physical extension of Herald Square. It is noted that the publicly accessible area at ground level proposed by the KHA scheme comprises approximately 42% of the 1 Alfred Street site. This is approximately four times the area that was initially recommended by the study. As such, the 1 Alfred Street site makes a substantial contribution to the alternative scheme in terms of publicly accessible space and arguments to the contrary raised in submissions are unwarranted.

Positive Impact on the Ringmer Pacific site

81. The proposed building envelope of the 55 metre high building on the eastern side of the 1 Alfred Street site is the result of Council and CSPC resolutions which allowed for the redistribution of height. This has facilitated good design on the site, as demonstrated by the Kerry Hill Architects scheme, by shifting some of the floor space from the western side of 1 Alfred Street to the east, thus reducing the potential bulk of the tower building and enabling a more slender tower form. This is a desirable compromise for the 1 Alfred Street site which is also likely to, on balance, be advantageous to the Ringmer Pacific site. This is because development on the Ringmer Pacific site would benefit from new views to the Harbour above the 55 metres on the eastern side of 1 Alfred Street, which is currently mostly obscured by the existing Goldfields House building and restricted by the “blanket” 110 metre height control in SLEP2005. On this basis, modifications are considered unwarranted.

ISSUE - Overshadowing and sun access

82. Several submitters consider that the alternative scheme will have unacceptable overshadowing and sun access impacts as follows:
- (a) the proposed tower on the 1 Alfred Street site will overshadow Grosvenor Place's North Plaza, which is well utilised and has good solar access, particularly on Winter mornings;
 - (b) several owner/occupiers of Cove Apartments are concerned that the alternative scheme will result in the loss of natural sun and natural/light to the north/north-east and south east facing apartments and restrict solar access into the northern CBD; and
 - (c) the proposed central square will have poor solar access for the majority of the year as a result of the height of 1 Alfred Street and therefore has limited merit.

RESPONSE

83. Any additional overshadowing impacts are considered to be minor within the context of existing LEP and DCP controls. For example, Section 4.1 of DCP1996 focuses on the impacts of overshadowing to public spaces during lunch-time hours, that is, 12 noon to 2.00pm between 14 April and 21 June, and clause 49 of SLEP2005 lists key public places that are to be protected from additional overshadowing, the majority of which are to also be protected between midday and 2.00pm. Grosvenor Place's northern plaza is not listed as one of these key areas in SLEP2005, nor will it be, subject to additional overshadowing during lunch time hours from future development on the APDG Block.
84. The City has undertaken modelling to determine any additional overshadowing impact to Cove Apartments and it is evident that additional overshadowing is likely to be restricted to early morning hours. Clause 6.1.4 of DCP1996 requires that, where possible, sun access should be for a minimum of two hours per day at the Autumn Equinox (21 March). The City's modelling indicates that compliance with this DCP requirement will not be undermined by the alternative scheme.
85. Although sunlight access to the central square will be quite constrained, on balance the square will have a significant positive benefit and promote greater priority to pedestrian movements and amenity in the City Centre. It is envisaged that the central square will be an active and dynamic space both day and night and improve connectivity with Circular Quay and Bulletin Place. The central square will contribute to the diversity of other public spaces in Central Sydney by virtue of its form, function and proximity to Circular Quay and will act as a focal point where a number of lanes and through-site links converge, promoting legible north-south and east-west connections. This character will be reinforced by a high level of street frontage activity in surrounding buildings.

ISSUE - Impact of alternative controls on development proposed under existing SLEP2005 controls

86. The owners of the Ringmer Pacific site seek clarification whether, in the future, the controls that enable the alternative scheme could be used as a justification for refusing development that is inconsistent with them. The owners question whether the inclusion of a central square and prescribing a height limit of 45 metres for the Ringmer Pacific site, that is, 65 metres less than the currently permissible height in SLEP2005, under the alternative scheme could have implications for development proposals lodged under existing controls. It is noted that a DA for a tower building was recently exhibited for the Ringmer Pacific site at 19-31 Pitt Street in accordance with the existing planning controls in SLEP2005 and not the alternative scheme.
87. To provide greater certainty, Ringmer Pacific have requested that, should the draft LEP and draft DCP Amendments proceed, that planning controls include a specific clause that states that development on land not identified as a development block may proceed and be assessed under existing planning controls, as if the alternative scheme controls are not in force, and that this should exclude, as a matter for consideration, any impacts on the potential Central public square.

RESPONSE

88. The alternative scheme offers “alternative” controls for affected land owners. If owners participate in the scheme, then they are offered additional height. If they do not participate, then they are governed by existing controls. There is no obligation for owners to participate in the scheme.
89. The alternative scheme is not intended to override or derogate from existing controls in SLEP2005 or DCP1996. However, despite this, future development applications would continue to be assessed, with due consideration given to the surrounding context, and the potential impacts on a future central square or proximity to other towers (for example) are likely to be matters for consideration at the relevant time. In the case of Cambooya, the participation of Valad in the scheme actually benefits their site, as a “window” to Sydney Harbour is opened up by Valad keeping the eastern building low. It is noted that achieving maximum height or FSR limits is subject to urban design considerations and controls regardless of the alternative scheme.

ISSUE - Request for public hearing from owners of Australia Square

90. The owners of Australia Square have requested that the issues raised in their submission warrant a public hearing in accordance with clause 68(1) of the EP& A Act.
91. The issues they raise include:
- (a) the draft LEP is inconsistent with the height control objectives in SLEP2005 and the current height controls have not been considered in the preparation of the draft LEP;
 - (b) the planning approach which has been adopted by Council has focussed only on the APDG Block and is inconsistent with the orderly and economic development of land in the Sydney CBD and with the objectives of the *Environmental Planning and Assessment Act 1979*;

- (c) the draft LEP undermines investment certainty in prime Sydney CBD office tower assets to the south;
- (d) the alternative scheme results in a significant reduction in amenity of occupants of those prime CBD office tower assets in circumstances where that amenity derives from long-established height controls; and
- (e) the alternative scheme will impact on views from Australia Square.

RESPONSE

92. The matters raised in the submission from the owners of Australia Square have been considered and are addressed in the table at Attachment C of this report. It is the City's view that the matters raised are not of such significance that they should be the subject of a public hearing before the Council decides whether and, if so, what alterations should be made to the draft LEP. It is considered that a public hearing is not necessary in this case.

ISSUE – Amendments to the draft DCP and draft LEP

93. Submissions from the owners of the 1 Alfred Street site and GE have requested that a number of specific amendments are made to the exhibited draft DCP. The purpose of the requests is primarily to allow for greater flexibility in future development scenarios to achieve the desired built form, or to "fine tune" the controls to be consistent with the winning entry of the design competition for the 1 Alfred Street site.

RESPONSE

94. The proposed changes to the draft DCP are discussed in detail in the submissions table at Attachment C to this report. Any changes that have been made to the draft DCP in response to specific requests are considered to be of a minor or technical nature and it is not considered that they warrant the re-exhibition of the draft DCP.
95. Some minor amendments have also been made to the alternative scheme arising from specific requests in submissions. The main change is that draft DCP Figure 2.69, that is, the height control envelope for the 1 Alfred Street site, and draft LEP clause 3(b)(iv) have been amended to reflect a minor revision to the footprint of the Kerry Hill Architects scheme 185 metre tower envelope. Since winning the competition in November 2009, Kerry Hill Architects have undertaken detailed design development work, resulting in some minor changes to the building envelope. As a result, there has been a slight increase to the 185 metre building footprint to 24% of the site area instead of 21% as exhibited in the draft LEP. The City has assessed any additional view and overshadowing impacts resulting from this change and considers them to be negligible

96. As discussed earlier in this report, the key change to the draft DCP is to amend provisions to allow for a larger central square. This is of a technical nature and the key changes are to Figure 2.67 – Building Frontage Height Plan and Figure 2.63 – Public Domain Map. Some other minor technical changes have also been made in order to ensure consistency with the draft LEP and to allow for a larger central square. Changes to the exhibited draft DCP are shown in Attachment E, where deleted text is indicated by ~~strikethrough~~, new text is in **bold underline**, and changes to figures are circled in red.

MICHAEL HARRISON

Director City Strategy and Design

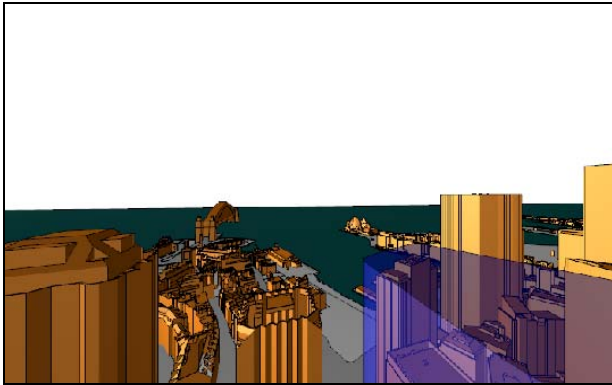
(Nicholas Knezevic, Specialist Planner)

ATTACHMENT

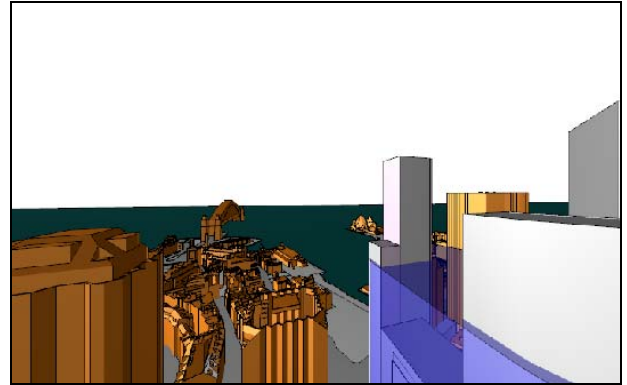
VIEW STUDY EXTRACTS

ATTACHMENT C

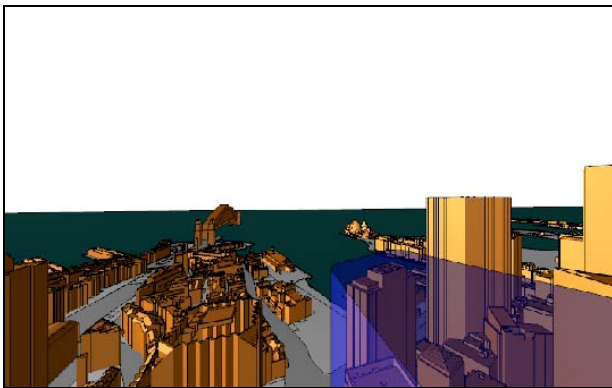
VIEW STUDY - GROSVENOR PLACE (FACING NORTH)



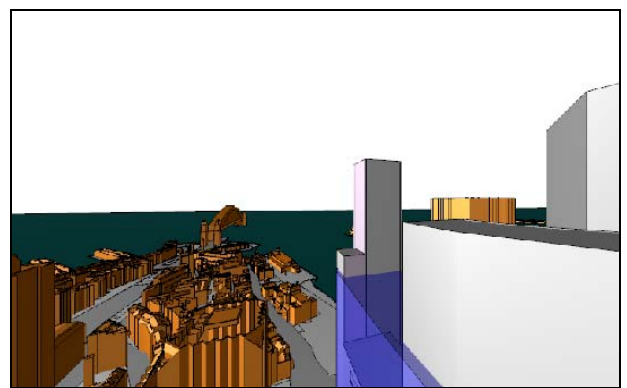
WEST – LEVEL 42 VIEW IMPACTS UNDER EXISTING CONTROLS (BLUE RENDERED ENVELOPE)



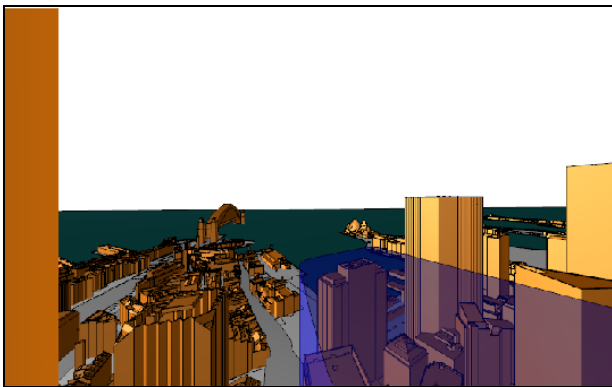
WEST – LEVEL 42 VIEW IMPACTS UNDER PROPOSED CONTROLS (GREY RENDERED ENVELOPES)



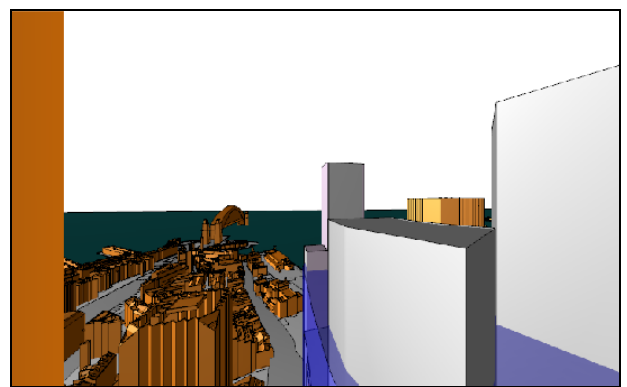
CENTRE – LEVEL 42 VIEWS IMPACTS UNDER EXISTING CONTROLS (BLUE RENDERED ENVELOPE)



CENTRE – LEVEL 42 VIEW IMPACTS UNDER PROPOSED CONTROLS (GREY RENDERED ENVELOPES)

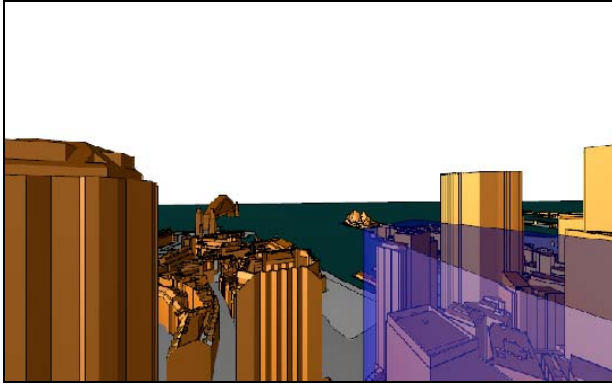


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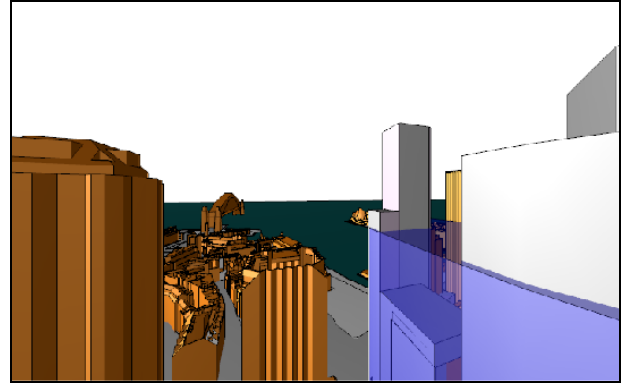


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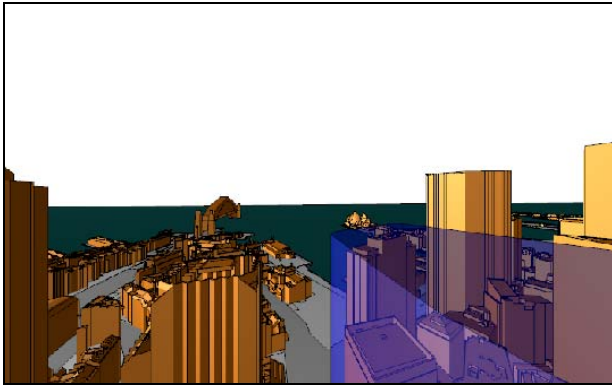
ATTACHMENT C



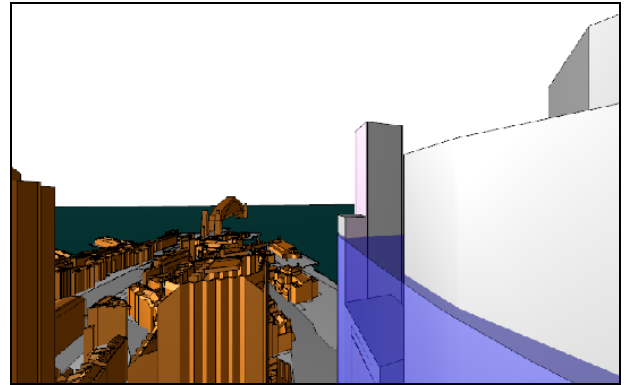
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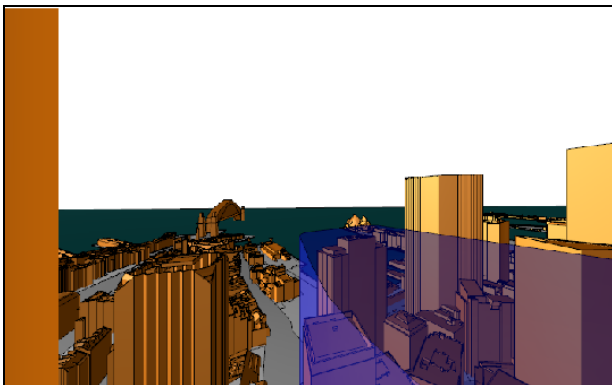
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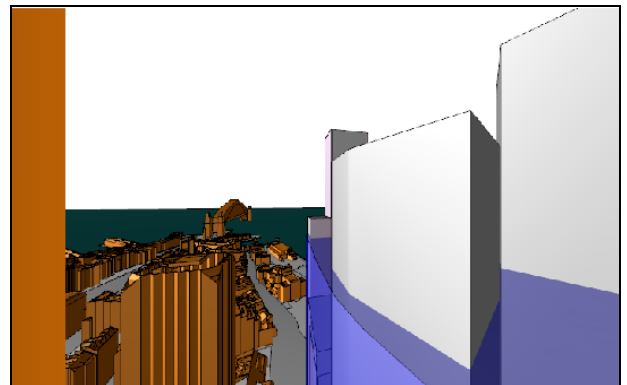
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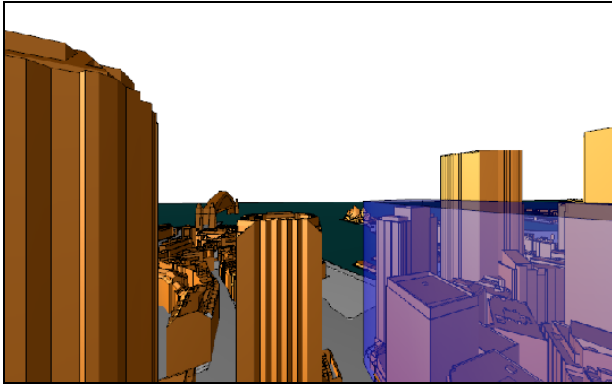


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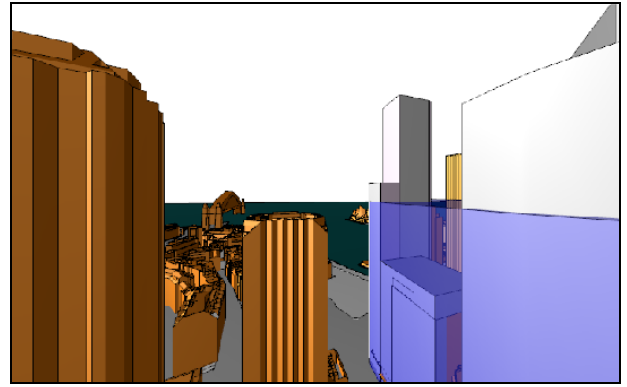


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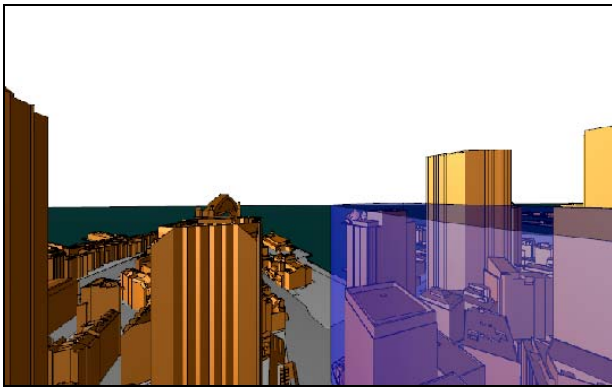
ATTACHMENT C



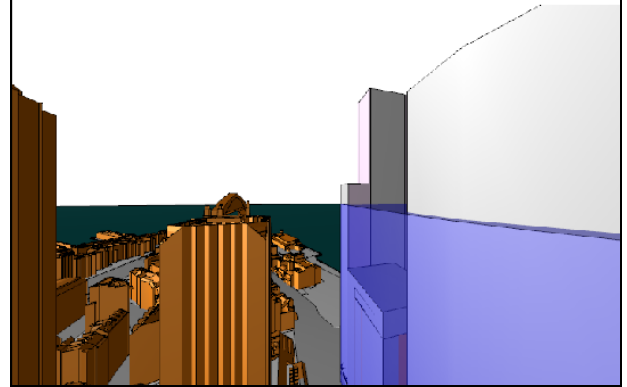
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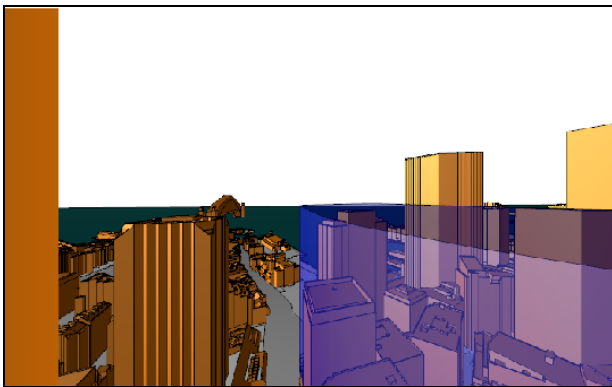
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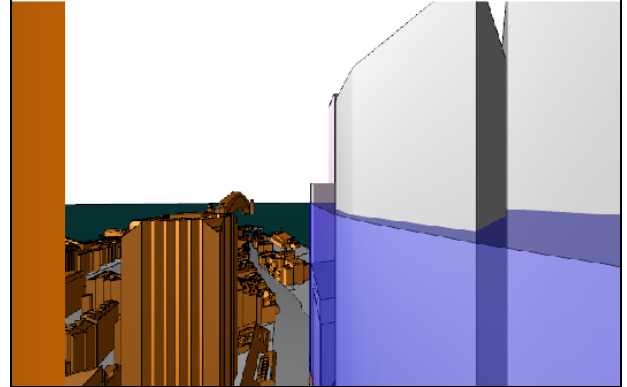
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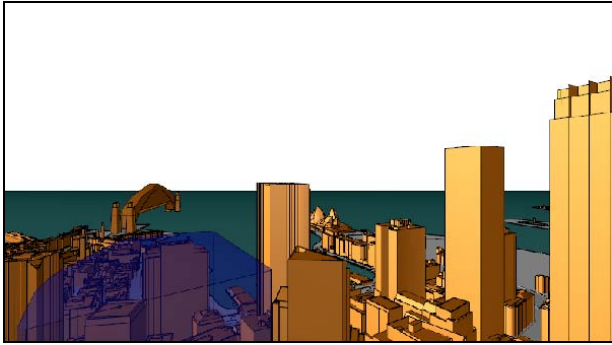
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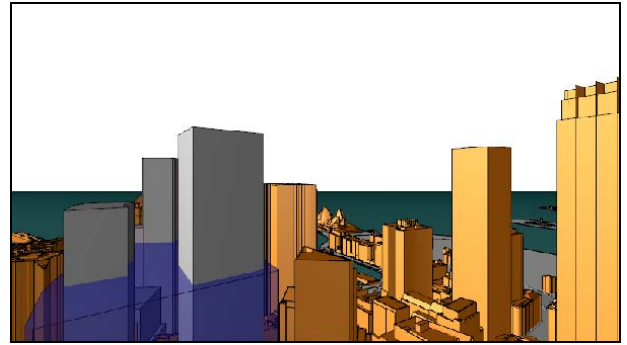
EAST – LEVEL 30 VIEW IMPACTS UNDER PROPOSED CONTROLS (GREY RENDERED ENVELOPES)

ATTACHMENT C

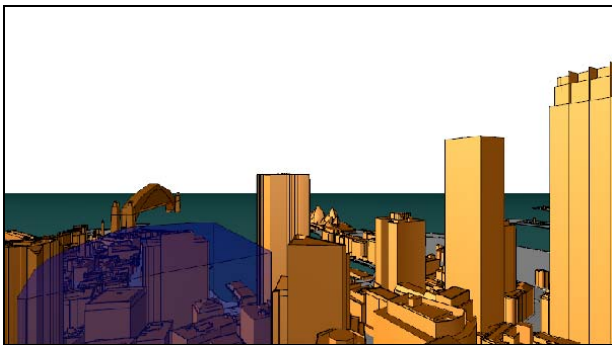
VIEW STUDY - AUSTRALIA SQUARE (FACING NORTH)



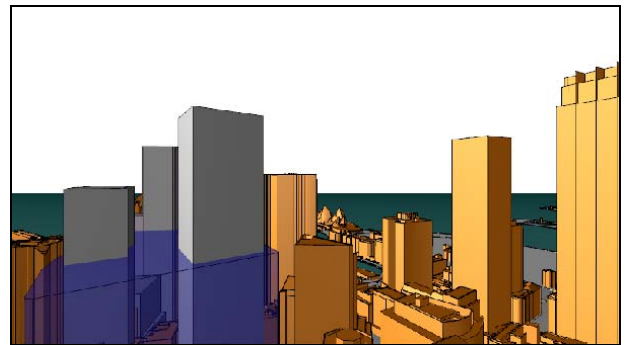
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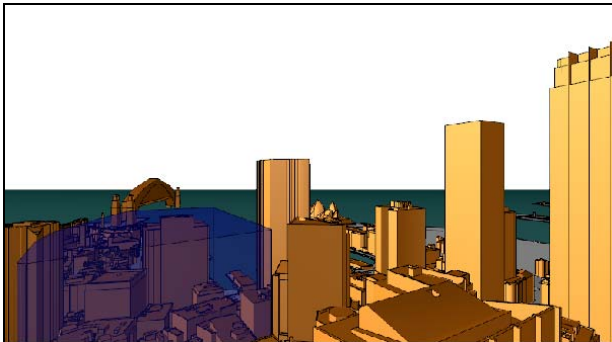
NORTH - LEVEL 50 - VIEW IMPACTS UNDER PROPOSED CONTROLS (GREY RENDERED ENVELOPES)



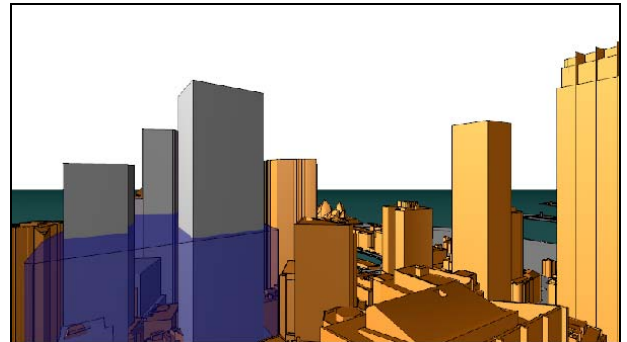
NORTH - LEVEL 47 (THE SUMMIT) VIEW IMPACTS UNDER EXISTING (BLUE RENDERED ENVELOPES)



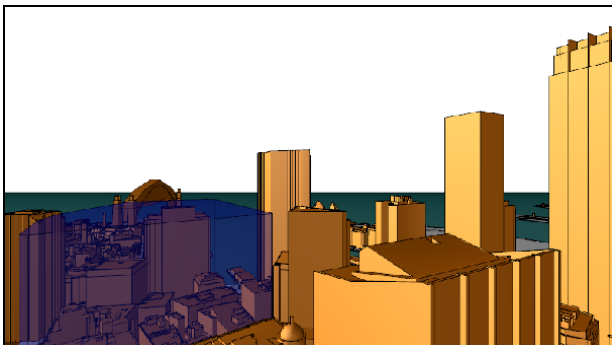
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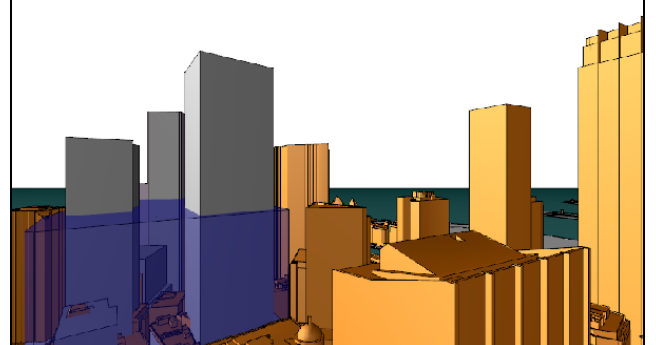
NORTH - LEVEL 43 VIEW IMPACTS UNDER EXISTING (BLUE RENDERED ENVELOPE)



NORTH - LEVEL 43 VIEW IMPACTS UNDER PROPOSED CONTROLS (GREY RENDERED ENVELOPES)



NORTH - LEVEL 39 VIEW IMPACTS UNDER EXISTING (BLUE RENDERED ENVELOPE)



NORTH - LEVEL 39 VIEW IMPACTS UNDER PROPOSED CONTROLS (GREY RENDERED ENVELOPES)