

ATTACHMENT A

# ATTACHMENT A

**SUMMARY OF SUBMISSIONS**



## Attachment A: Summary of submissions

### State government submissions

Author/property	Submission summary	City comment
<b>Office of Environment &amp; Heritage as delegate for Heritage Council of NSW, 26 June 2017</b>	<b>Support.</b> Notes proposed changes. Supports the DCP provisions for maintaining the legibility, prominence and integrity of the Former RC Henderson factory, for designing the top two levels to present as a discrete, lightweight rooftop addition, and the change to the heritage item property description to remove land parcels that do not form part of the listing.	Support noted.
<b>Transport for NSW, 26 June 2017</b>	<b>Issues raised.</b> Requests the applicant consult with Sydney Coordination Office within Transport for NSW about these issues. Issues follow.	City staff met with Transport for NSW to discuss the issues, and requested further information. Applicant advised they also met with Transport for NSW.
	Central Station works: <ul style="list-style-type: none"> <li>• Proposed new eastern entry at 20-28 Chalmers Street for Central Station, part of Central Walk state significant infrastructure proposal, requires cut and cover excavation of Randle Lane directly adjacent to the proposed loading dock.</li> <li>• Construction for these works requires road closures to Randle Lane for approximately 12 months, with ongoing impacts to Randle Lane access for approximately 5 years.</li> <li>• Requests construction activities of the site are coordinated with Sydney Metro and Sydney Coordination office within Transport for NSW.</li> <li>• Opportunities for development integration with Central Walk as TfNSW is safeguarding a future connection to Randle Lane and/or Elizabeth Street.</li> </ul>	Central Station works: <ul style="list-style-type: none"> <li>• Construction and access impacts can be considered and coordinated in future development stages.</li> <li>• Improved connections to Central Station are compatible with and may benefit the proposed hotel use and laneway activation.</li> <li>• Design implications for the hotel, traffic movements and laneway activation can be incorporated into the detailed design at the next development stages, once the station entry plans are more certain, as the exhibited concept drawings do not provide details of any opening to Randle Lane.</li> <li>• City staff requested information from Transport for NSW on the future connection, and coordination opportunities for laneway works.</li> </ul>
	Randle Street traffic: <ul style="list-style-type: none"> <li>• Parking on the north side of Randle Street will be replaced by a bus lane associated with the Sydney Light Rail project.</li> <li>• The proposed set-down and pick-up outside of the bus lane operating hours would not be possible, if the bus lane operates for 24 hours.</li> <li>• Requests the potential drop-off-pick-up zone on Randle Street is removed from DCP.</li> </ul>	Randle Street traffic: <ul style="list-style-type: none"> <li>• DCP has been updated as requested to remove the Randle Street drop-off/pick-up zone.</li> <li>• The close proximity of the site to Central Station railway, light rail, and bus services offers public transport alternatives for guest and staff transportation.</li> </ul>

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	<p>Randle Lane:</p> <ul style="list-style-type: none"> <li>• Recommends amendments to allow for all loading and service vehicles to enter and exit the loading dock in a forward direction, for pedestrian safety.</li> <li>• Supports widening the footpath.</li> <li>• Swept path analysis for loading dock vehicle movements does not take into account 1.2 metre path widening.</li> <li>• Decreased carriage width will have potential to restrict coach parking on lane.</li> <li>• Elizabeth Street, between Randle and Chalmers Streets, will be converted to two way traffic.</li> <li>• Coach parking on lane, currently a no parking zone, will potentially impact traffic movements on lane and queuing into Elizabeth Street, with potential impacts on general traffic and bus operations on Elizabeth Street, particularly during peak periods.</li> </ul>	<p>Randle Lane:</p> <ul style="list-style-type: none"> <li>• City staff discussed this with Transport for NSW staff and the challenges with servicing the site when addressing all these requirements. City staff also discussed this with the proponent.</li> <li>• Based on these discussions, it was understood a shared zone lane conversion would address all the transport issues, whereas a pathway widening alone as exhibited may not.</li> <li>• The indicative drawings demonstrate a turntable can be accommodated on site to enable forward movement of entering and exiting service vehicles. Together with a widened path, this option also has capacity to address the servicing and transport issues.</li> <li>• The specific public domain upgrade for a path widening has been removed, though remains an option in the DCP.</li> <li>• Provisions have been inserted in the DCP to address these issues, including public domain upgrades and transport management, at the development application stage.</li> </ul>
<p><b>Transport for NSW, 14 September 2017</b></p>	<p>Further information provided in response to City request on pedestrian link:</p> <ul style="list-style-type: none"> <li>• Potential future pedestrian link for Central East entry would continue from the east boundary of 28 Chalmers Street at RL 14.2 with minimum of 5-metre clear width and 4-metre clear height.</li> <li>• Amendments to LEP to effect a future pedestrian tunnel protection could identify a concurrence provision for any future development application.</li> <li>• Plans showing the precise location of the extension are not available.</li> <li>• Transport for NSW see the advantages of coordinating with the landowner to activate the laneway and recommends any future development does not preclude this.</li> <li>• May be an opportunity to convert Randle Lane to a shared zone, with no kerb to allow for free flow of pedestrians and vehicles. This would future-proof the site if a Metro entry is included at 28 Chalmers Street to allow access from Surry Hills.</li> </ul>	<ul style="list-style-type: none"> <li>• As the potential tunnel is below the proposed basement level, it does not preclude the hotel as provided for by this planning proposal.</li> <li>• The additional information provided can assist discussion between Transport for NSW and the landowner to potentially include a tunnel.</li> <li>• The existing mixed use LEP zone permits a pedestrian tunnel use and has compatible objects to maximise public transport patronage.</li> <li>• Following discussion with the proponent, concurrence provisions have been inserted into the planning proposal LEP amendments, modelled on the State Environmental Planning Policy (Infrastructure) 2007 (SEPP).</li> <li>• A shared zone conversion can be considered in future development stages if necessary to address all transport issues and support the proposed uses, once the details of the hotel design and adjoining transport plans are more certain. This conversion would require separate approval from the Roads and Maritime Services.</li> </ul>

Author/property	Submission summary	City comment
<b>Roads and Maritime Services, 27 June 2017</b>	<b>No objection.</b> Notes proposed changes and that Council is currently consulting with Transport for NSW regarding parking changes on Randle Street and drop off and pick up on Randle Street and Lane. Proposal would not have any significant traffic impact in the State Road network.	No objection noted.

### Community submissions

<b>Resident of 8 Cooper Street, Surry Hills, 6 June 2017</b>	Issues are outlined in following rows.	Submission noted and building inspected by City staff. City comments on issues raised are in following rows.
	<p>Views &amp; outlook:</p> <ul style="list-style-type: none"> <li>• View loss from the west-facing apartments at 8 Cooper Street is not minor as described in the documentation. It will create a bulky new structure 2 storeys above the existing Henderson building at 11-13 Randle Street.</li> <li>• It will block all surrounding views which currently include UTS Tower, 1 Central Park, Newtown and across Central Station.</li> <li>• The new hotel will dominate the outlook from their unit, and all west facing units in the "Icon" which currently have some outlook over the roofs of the three buildings in Randle Street.</li> </ul>	<ul style="list-style-type: none"> <li>• The planning proposal will alter the western outlook directly opposite these apartments, particularly from the highest level 7 where this submitter resides. Level 7 is elevated above the existing Randle Street buildings.</li> <li>• Existing outlook or views are available because two of the existing buildings on the subject site are lower than the permissible 27 metre maximum height. The additional view loss or outlook change as a result of the proposed increased height of approximately 7.5 metres above the currently permissible 27 metres is minimal.</li> <li>• The planning proposal will not affect other expansive views from the submitter's apartment to the skyline.</li> <li>• Urban design provisions in the development control plan and the design excellence process will promote a well-designed building for the new outlook. Residents will have further opportunity to comment on the detailed at the development application stage.</li> <li>• This level of outlook and view change, with safeguards in place for good design, is considered acceptable on balance with the benefits of the planning proposal, including maintaining the prominent features of the Henderson building and hotel room supply.</li> </ul>

	<p>Amenity:</p> <ul style="list-style-type: none"> <li>• New hotel will overlook their apartment and others in the building, particularly at the top two levels, impacting their privacy.</li> <li>• Change of use to a hotel will create more noise in evenings, nights and weekends.</li> <li>• The hotel will be oversized and overdeveloped with 126 rooms, resulting in significantly greater traffic, noise and usage of facilities in Randle Street, Randle Lane and Elizabeth Street. These will exacerbate the negative impact of traffic changes on these streets.</li> </ul>	<ul style="list-style-type: none"> <li>• Privacy and noise issues associated with the proposed uses can be addressed in detail as part of a design excellence process and the development assessment process. As part of these processes opportunities to mitigate impacts should be explored such as the use of louvres and screens.</li> <li>• A requirement for a transport management plan has been added to the development control plan to ensure traffic issues are appropriately addressed at the next stages before development consent is issued.</li> <li>• Privacy, traffic and noise impacts will also be assessed in detail at the later development application stage.</li> </ul>
	<p>Heritage:</p> <ul style="list-style-type: none"> <li>• Negative impact on Henderson building's visual and structural integrity. The beautiful historical building will be dominated and lost inside the unsympathetic and over-scaled modern structure being tacked onto that building left, right and topside.</li> <li>• The plain brick side walls are a significant part of its charm, which are highly visible and add materiality, colour and texture.</li> <li>• New extensions on either side should be at least one storey lower in height than the Henderson building, without additions above the building's cornice, so it will not be overwhelmed by modern extensions, and expose at least one level of the side brick walls. It will also match the height of 1-5 Randle Street on either side of the Henderson building for the unity of the streetscape.</li> </ul>	<ul style="list-style-type: none"> <li>• The additional height minimises negative internal impacts on the Henderson building that may otherwise be proposed to achieve additional floor space. The setback of the top two levels will also maintain the visual prominence of the Henderson building which will remain the tallest element on the street frontage.</li> <li>• The new building use will encourage its ongoing conservation and maintenance, with opportunity for servicing the adjoining site.</li> <li>• Maintaining the lower building height of 7 storeys for the corner property at 15 Randle Street was tested prior to exhibition. This investigation concluded that a reduced envelope on the corner site did not realise the intent to improve the heritage item's legibility. Therefore an alternative solution is proposed through a DCP provision for deep vertical recesses flanking the heritage item.</li> <li>• For these reasons, and with the additional requirements to achieve a sensitive building design contained in the development control plan, this proposal is considered to have an acceptable overall impact on the heritage item.</li> </ul>

Author/property	Submission summary	City comment
<b>Owners of 407-419 Elizabeth Street, Surry Hills, 26 June 2017</b>	Issues are outlined in following rows.	Submission noted and building inspected by City staff. City comments on issues raised are in following rows.
	Light: <ul style="list-style-type: none"> <li>• Loss of natural light to employees of commercial building at 407-419 Elizabeth Street.</li> </ul>	<ul style="list-style-type: none"> <li>• The proposed building form will cast similar shadows on 407 Elizabeth to a compliant building constructed to existing height maximums, based on the shadow diagrams. This is aided by setbacks for the upper levels on Randle Street.</li> <li>• City staff inspection of 407 Elizabeth Street interiors demonstrated that the three frontages provide good solar access at upper levels, diminishing towards the lower levels.</li> <li>• It is considered that the proposal will not unreasonably impact on the sunlight and daylight access available to 407 Elizabeth Street and its commercial use.</li> </ul>
	Future use: <ul style="list-style-type: none"> <li>• Negative light impact when converted to residential in the future.</li> </ul>	<ul style="list-style-type: none"> <li>• An assessment of a proposal considers impacts on existing uses. 407-419 Elizabeth Street is not currently a residential building. Should a new use be proposed, this will need to take into account the applicable policies at the time.</li> </ul>
	Lane setback: <ul style="list-style-type: none"> <li>• Insufficient 1.2 metre setback on the lane to achieve street activation and allow pedestrians to pass each other.</li> </ul>	<ul style="list-style-type: none"> <li>• Provisions have been inserted in the DCP to provide for public domain upgrades on the lane to address these issues through a solution to be determined at the development application stage, once the plans for the hotel and adjoining sites are more certain. This may result in different approaches than the exhibited widened path, such as a shared zone conversion.</li> </ul>

Author/property	Submission summary	City comment
<b>Owner of 372 Elizabeth Street, Surry Hills, 27 June 2017</b>	Issues are outlined in following rows.	Submission noted and building inspected by City staff. City comments on issues raised are in following rows.
	Height: <ul style="list-style-type: none"> <li>• Increase height should not exceed existing façade of the heritage item of RL 55.48.</li> <li>• With its close proximity to Central Station, the site could still be developed for a profitable hotel to this height across three site, with an extra 15 metres allowable under existing planning controls.</li> <li>• The documentation is misleading by describing the height increase as slight. Two extra storeys above six storeys is a 33% increase</li> </ul>	<ul style="list-style-type: none"> <li>• The existing maximum height of 27 metres approximately follows the parapet wall height of the heritage item at RL 55.48, with variations to follow ground level changes.</li> <li>• Maintaining the existing height limits would provide little incentive for hotel use when more profitable uses can access the same standards. It would also encourage greater internal alteration to the heritage item to achieve the maximum floor space within the existing height limits.</li> </ul>
	Views: <ul style="list-style-type: none"> <li>• Loss of iconic views from the level 7 residence to the Central Station clock tower. This view is also lost from commercial level 6 balcony.</li> <li>• The proposed documentation incorrectly states there are no residential view impacts from this site. There is a residence at the 7<sup>th</sup> floor of 372 Elizabeth Street, since 1999.</li> </ul>	<ul style="list-style-type: none"> <li>• The omission of the residence in the exhibited documentation is acknowledged and therefore the City assessed this impact after exhibition.</li> <li>• Approved as a caretaker's residence, this unit is located on the office building's rooftop, setback along the side/rear boundary, 'behind' a large open rooftop terrace. The rooftop terrace extends along the building frontages to Elizabeth and Cooper Streets.</li> <li>• The planning proposal may result in the partial loss of views towards the clock tower. While a visible iconic feature, the clock tower is not a prominent feature of the skyline from this rooftop level, due to taller surrounding buildings in the foreground to the clock tower or its surrounding skyline.</li> <li>• This view is only a portion of the total expansive views available from 372 Elizabeth Street from the rooftop level. This level of view loss is considered acceptable on balance with the overall benefits of the planning proposal.</li> </ul>

Author/property	Submission summary	City comment
	<p>Dental Hospital:</p> <ul style="list-style-type: none"> <li>Poor heritage response to Dental Hospital, as designs crowds and encroaches on this heritage item, diminishing its free-standing identity. The axonometric view is misleading by showing the hospital as higher than it will appear with the Randle development butting against the top floors of the hospital.</li> </ul>	<ul style="list-style-type: none"> <li>The site has no common boundaries with the Dental Hospital, which is located on the opposite side of the lane. The axonometric drawing does not make this clear. However, other exhibited drawings more clearly show the relative location of the hospital to the subject site. The street elevations show the proposed building envelope is located below the height of the hospital.</li> <li>Therefore the impact on the setting of the dental hospital is considered acceptable.</li> </ul>
	<p>Henderson building:</p> <ul style="list-style-type: none"> <li>Poor heritage response to Henderson building, as new design subsumes the heritage building, rather than respecting the heritage building and maintaining the interesting variety of scale in the street. The existing controls have similar issues.</li> </ul>	<ul style="list-style-type: none"> <li>The setback of the top two levels behind the Henderson building parapet wall and a sensitive design for the new building will minimise the impact of the new building on the prominence and setting of the heritage item. Specific provisions in the development control plan are included to provide for a sensitive design when resolved at later development stages.</li> <li>The additional height also reduces potential internal impacts on the heritage item to achieve more floor space.</li> <li>The impact on the heritage item is considered acceptable.</li> </ul>