Attachment A1

Request for Planning Proposal

URBIS

REQUEST FOR PLANNING PROPOSAL

Stockland Piccadilly Complex

133-145 Castlereagh Street, Sydney

Prepared for
STOCKLAND
September 2025

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

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Project Code	P0047430
Report Number	FINAL_27 Sept 2025

Acknowledgement of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on.

We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years.

We pay our respects to First Nations Elders, past and present.

The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

Title: Sacred River Dreaming
Artist Hayley Pigram
Darug Nation
Sydney, NSW

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CONTENTS

APPENDICES. – REFER TO SECTION 1.6 FOR ACCOMPANYING DOCUMENTS

EXECUTIVE SUMMARY

EXPLANATORY NOTE

This Request for Planning Proposal (**PP**) report has been prepared by Urbis Ltd (**Urbis**) on behalf of Stockland Development Pty Ltd to accompany a proponent-initiated planning proposal in support of an amendment to the *Sydney Local Environmental Plan 2012* (**Sydney LEP 2012**).

The PP aims to insert a site-specific provision applicable to the Stockland Piccadilly Complex located at 133-145 Castlereagh Street, Sydney into Part 6, Division 5 of the Sydney LEP 2012 relating to various matters including floor space ratio (**FSR**), car parking and through-site links. The PP also seeks to amend Schedule 6C of the Sydney LEP 2012 related to affordable housing contribution requirements.

PURPOSE

The purpose of the PP is to facilitate the redevelopment and renewal of the Piccadilly Centre site incorporating the retention and re-cycling of the Castlereagh Street tower structure as well as existing basement structures delivering significant embodied carbon savings. The PP seeks to facilitate optionality in the final land use mix that allows for land use scenarios that include:

- A commercial development incorporating retail and/or place of public worship within the lower levels of the building.
- A mixed-use development incorporating commercial development, with the residential accommodation at the upper levels of the new tower, together with the incorporation of retail within the lower levels of the building.

Two supporting concept reference schemes have been prepared to demonstrate how two different land use concepts could be delivered within the proposed planning controls.

The PP and accompanying references schemes proposal are founded upon:

- A significant **increase in commercial floor space** on the site aligned to strategy.
- A **total maximum GFA** regardless of which development option is pursued.
- **Significant retention** of the existing basement and tower structure,
- The **opportunity for Wesley Mission** to continue its operation through redevelopment, (in a commercial scheme), and
- The **opportunity for residential accommodation** (in a mixed-use scheme) to provide a diversification of land uses and support the viability and certainty of the development, capped at a maximum of 15% of total floor area.
- **Delivery of agreed public benefits** and public domain outcomes regardless of the land use

It is expected that the objectives and intended outcomes of the PP will be facilitated by a site-specific provision in the Sydney LEP 2012. Thus, no mapping amendments are expected to be required.

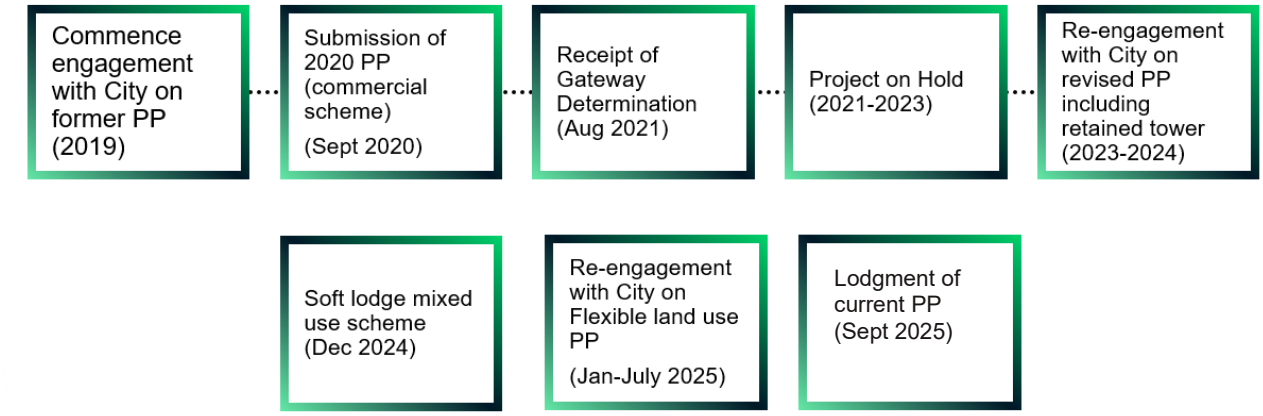
The PP is accompanied by a site-specific amendment to the Sydney Development Control Plan 2012 (**Sydney DCP 2012**) to establish site specific provisions to guide future development for the site. It is intended that the draft DCP will be developed in further consultation with the City of Sydney (**Council**).

PLANNING HISTORY AND STAKEHOLDER ENGAGEMENT

The PP is the culmination of over five years of extensive engagement with Council stakeholders and the preparation of detailed studies, reference schemes and modelling to determine the most appropriate land uses for the site and to identify the site's capacity for increased floor space whilst resolving an existing solar access impact on public open space.

Aligned with Stockland's corporate position on ESG, the principles for the site have evolved over time and now centre on the concept of adaptive re-use, with significant embodied carbon savings associated with significant retention and adaptive reuse of the existing office tower and basement.

The following diagram outlines key project milestones and is discussed following.



Stockland Development has consulted with Council on opportunities to re-imagine the Piccadilly Complex, to achieve additional contemporary employment floor space as well improve its contribution to the fabric of Central Sydney. The consultation between 2019 – 2022 primarily related to a former planning proposal (PP-2021-4199) to support a commercial redevelopment of the site. During this initial period of engagement, Stockland responded to feedback from the Council Design Advisory Panel (**DAP**), Planning & Design Team and other Technical Officers.

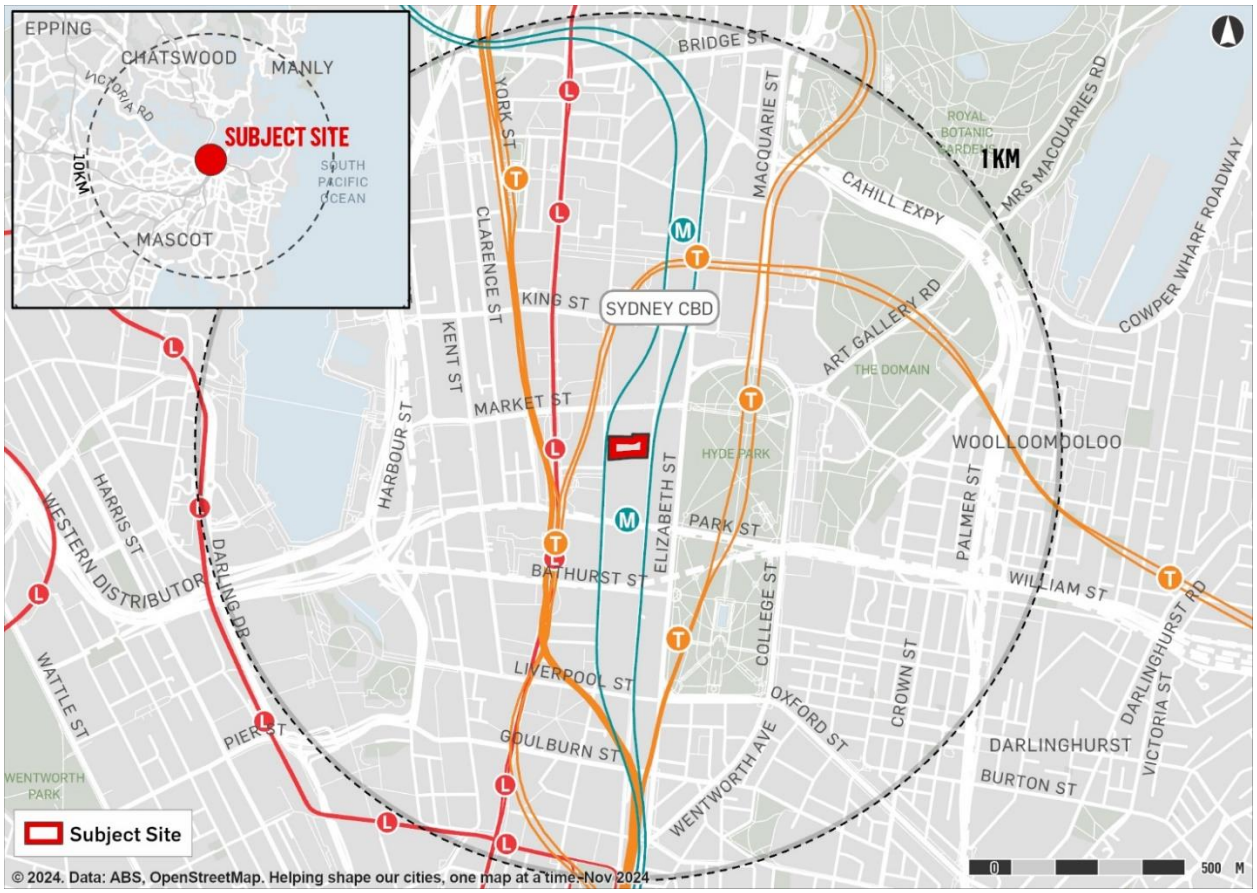
As a result of the pandemic and global changes in the commercial office market, between 2021 – 2023 there was a hold in the project. In 2023, Stockland re-commenced exploration of future options for the site and an extensive options analysis to determine the most appropriate use and development outcome for the site. This included the potential to incorporate residential accommodation into the proposal at the upper levels while retaining the majority of the floor space for commercial use. This was discussed and presented to the Council over the course of several meetings throughout 2024 informing the draft lodgement of an updated PP request in December 2024.

In essence, Stockland has been engaging with the City of Sydney for over 5 years proving up different scenarios for the redevelopment of the Piccadilly Centre, with the awareness that planning flexibility is key to unlocking the complexities of the site, landowner requirements and the external market environment. Therefore, this current PP seeks to retain land use optionality to respond to the site challenges on the basis that the different land use outcomes presented are all capable of demonstrating site specific and strategic merit.

SITE CONTEXT

This PP relates to land known as Stockland Piccadilly Complex and located at 133-145 Castlereagh Street, Sydney. The site is legally described as Lot 10 in DP828419 and is owned by the Uniting Church in Australia Property Trust (N.S.W). The site is situated above part of Lot 141 in Deposited Plan 1231660, which is a subterranean stratum of land acquired by Transport for NSW for the proposes of Metro. A map of the site location is illustrated in Figure 1.

Figure 1 Regional location of site



Source: Urbis

The site currently comprises three buildings known as the 'Piccadilly Complex' completed in 1991 which has been the subject of progressive improvements to upgrade selected elements of the site. The buildings on the site include a 14-storey office building fronting Pitt Street, 2 storey retail podium building, and 31 storey commercial office building fronting Castlereagh Street which accommodate commercial uses including office and retail space, and basement parking.

Wesley Mission, a non-for-profit organisation forming part of the Uniting Church, operates facilities located on the ground and basement levels of the site including the Wesley Church, Lyceum, Wesley Theatre and supporting office space.

INTENDED OUTCOMES

The indicative reference schemes have been prepared by 3XN Australia as part of a comprehensive urban design process to establish the appropriate mix of land uses and inform a building envelope for the site. The envelopes include appropriate allowances excluded from the GFA calculation under the LEP and design measures to ensure flexibility for a future design excellence competition process.

The intended outcomes of the reference schemes, enabled by the planning proposal, include:

104,867sqm of GFA, being predominantly commercial office use, with the opportunity for up to 15% to be residential floor space, together with the potential to retain the place of public worship (Wesley Mission Facilities) and associated retail use.

Approximately 2020 direct employment opportunities generated on site and $974,372,000 expenditure upon completion.

Improvement to the urban fabric of Central Sydney through alignment of the new built form to the street edge, enhancing pedestrian activation and amenity.

Removal of the existing Hyde Park SAP breach (from the existing Piccadilly tower) to enhance the sunlight access to Hyde Park between 10am and 2pm all year.

Improvements to the public domain outcome including removal of the Castlereagh Street vehicular access ramp, reinstatement of the pedestrian footpath, removal of existing sky bridges connecting to site and creation of a new 24/7 pedestrian access through site link.

Delivery of an exemplar sustainable, upcycling project with significant embodied carbon savings along with establishing criteria to achieve a high level of environmental performance and design excellence.

Option for the continuation, retention and enhancement of the existing Wesley Mission social and community services in the centre of the city.

PLANNING PROPOSAL

The PP has been prepared in accordance with the Department of Planning, Housing and Infrastructure (**DPHI**) '*Local Environmental Plan Making Guidelines'* (**LEP Guidelines**) dated August 2023.

The Council Guideline for Site Specific Planning Proposals in Central Sydney (**Site-Specific PP Guideline**) prepared to support the Central Sydney Planning Strategy (**CSPS**) outlines that whilst planning proposals cannot contain residential or serviced apartment floor space, there are exceptions for Solar Access Opportunity Sites. To qualify as a Solar Access opportunity Site, the Request must ensure compliance with Sydney LEP 2012 SAP controls and remove an existing significant breach of more than 15 metres in height.

This PP will enable compliance with the SAP provision and remove the existing Hyde Park sun access plane (**SAP**) breach. The site is therefore considered a Solar Access Opportunity Site for the purposes of the mixed use option, and the PP complies with Council's Guideline.

This PP report and the submitted documentation demonstrate that there is strategic and site-specific merit to support the advancement of the PP as follows:

Strategic Merit

- The PP demonstrates a high level of consistency with the strategic planning framework governing the Greater Sydney Region and Sydney CBD.
- Alignment with CSPS objectives, which includes actions to investigate provisions that reward the retention, refurbishment and upgrade of older office buildings. The scheme will deliver an environmentally sustainable outcome, efficient use of land, supporting great streets, provision of community services infrastructure and ensures a resilience and diverse economy.
- Consistent with the City's Site-Specific PP Guidelines through rectification of a Solar Access Opportunity Site if a residential mixed-use option is progressed.
- The PP is consistent with the State Environmental Planning Policies and s9.1 Ministerial Directions.
- The PP will significantly enhance the employment generating capacity of the site through the enabling additional employment floorspace which will ensure the Sydney CBD remains competitive and maintains its global status, both in terms of quantity, quality and availability of floor space.
- The proposed development enabled by the PP will be an exemplar upcycling project, furthering the CSPS sustainability objectives including significant embodied carbon emissions savings and retention, refurbishment and upgrade of older office buildings.

Site Specific Merit

- The Urban Design Report and Concept Reference Schemes demonstrates how the site can accommodate the increased floor space density to increase the employment generating capacity of the site, irrespective of whether the residential accommodation option is pursued.
- The proposal will deliver significant public domain improvements including a through-site link between Pitt and Castlereagh Streets and enhancements to pedestrian amenity and activation at the ground plane through removal of the existing Castlereagh Street parallel basement parking ramp which is a significant intrusion into the public realm.
- The proposal will reduce the existing parking provision on site and remove the existing casual public parking arrangements.
- The availability of a large site of 4,800m2 in area is a significant opportunity to deliver premium grade commercial floor space maximising daylight access and improved amenity.
- Redevelopment of the site provides the opportunity to deliver an efficient and sustainable site-specific outcome within proximity to transport corridors and local, strategic and metropolitan centres. As explored within the Sustainability Strategy, this will ultimately slow emissions growth and contribute to a low-carbon city, aligning with the sustainability priorities of State and local policies.
- The site is not subject to significant ecological or environmental constraints due to its development history and location within a built urban area, and local infrastructures and services have already been accommodated on the site.

In accordance with the above, it is submitted that the proposed amendments to the LEP are appropriate in that they are consistent with the State's strategic direction in that it will provide additional and diversification of floor space in Central Sydney.

We recommend that Council resolves to support this PP to the NSW DPHI Gateway Review Panel and the issuing of a Gateway Determination that facilitates the proposed amendments to the Sydney LEP 2012.

1. INTRODUCTION

1.1. OVERVIEW

This PP Report has been prepared by Urbis, on behalf of Stockland Development Pty Ltd, to accompany a proponent-initiated planning proposal in support of an amendment to the Sydney LEP 2012.

It is irregular in shape, extends to an area of 4,800m^2 and contains two street frontages onto Castlereagh Street to the east (55m) and Pitt Street to the west (54m). The site is located within the Sydney local government area (**LGA**) and the Central Sydney core.

The PP aims to insert a site-specific provision applicable to the Stockland Piccadilly Complex located at 133-145 Castlereagh Street, Sydney and known as Lot 10 DP 828419 into Part 6, Division 5 of the Sydney LEP 2012 relating to various matters including FSR, car parking and through site links. The PP also seeks to amend Schedule 6C of the Sydney LEP 2012 relating to contribution requirements.

1.2. THE PROPONENT

Stockland is one of Australia's largest diversified property groups, with key sectors of residential (including land lease), commercial/workplace, logistics and retail town centre.

Stockland is focused on dynamically reshaping its portfolio through accelerating delivery in core business, scaling capital partnerships, and achieving long-term sustainable growth. A key policy driver for the business is ESG with a focus on:

- Decarbonisation
- Circularity
- Social impact
- Resilience

Proponent Vision and Principles

Since 2022, Stockland has been re-considering the development outcome on the site with a key driver being the building upcycling opportunity that could be realised. Stockland identified important limitations that the previous PP exhibited including the full site demolition and redevelopment of the site, which is misaligned to Stockland's ESG commitments, the need to displace Wesley for the period of construction and the quantum of commercial floor space proposed in a changed market environment post pandemic. The current scheme has overcome these factors to enable a more superior development outcome, with the key objectives outlined below.

Key Objectives

- **Better workplace:** address the previous constraints and make the workplace offering more compelling with more coherent office tower floorplates.
- **Manage the Risk of the Scale of the Office Floorspace:** create the optionality to reduce the previous quantum of commercial floor area and enable a staged delivery to provide greater investment certainty and confidence for the project to proceed.
- **Create the ability to retain Wesley on site and in place:** create the potential to retain Wesley facilities in situ, managing structural intervention and enabling a better commencement control through staging.
- **Sustainability and Upcycling:** the upcycling proposition considers its whole of life carbon and can fully leverage all latent capacity.
- **Produce a better urban outcome:** drawing back from the north and greater articulation allowance to be provided within the proposed envelope.

1.3. PROPOSED LEP AMENDMENTS

The PP aims to insert a site-specific provision applicable to the Stockland Piccadilly Complex located at 133-145 Castlereagh Street, Sydney into Part 6, Division 5 of the Sydney LEP 2012 relating to:

- a maximum allowable FSR on the site of 19.67:1 which can achieve an FSR of 21.85:1 if a competitive design process has been held through a 10% FSR bonus,
- the reduction to the existing car parking on site,
- delivery of public domain upgrades including an improved through site link with retail activation and removal of the existing vehicular entry ramp.

The planning proposal also seeks to amend Schedule 6C of the Sydney LEP 2012 related to affordable housing contribution requirements associated with the uplift floorspace achieved by the PP.

The planning proposal is accompanied by a site-specific amendment to the Sydney Development Control Plan 2012 (**the DCP**) to establish site specific provisions to guide the future development for the site. It is intended that the draft DCP will be developed in further consultation with the Council.

The intended outcome of the proposed amendments to the LEP and DCP is to facilitate the redevelopment of the site for either a commercial scheme or a mixed-use scheme including retail and an option for Wesley Mission facilities at ground and below, together with basement car parking and associated facilities.

The PP is supported by two conceptual reference schemes (for both a commercial and mixed-use scheme) however the design of the development will be subject to a future design excellence process and a future detailed development application.

1.4. REPORT STRUCTURE

This PP has been prepared in accordance with section 3.33 of the EP&A Act and the DPHI LEP Guidelines.

The relevant sections of this report are listed below:

- **Section 2:** Detailed description of the site, the existing development and local and regional context.
- **Section 3:** Planning proposal pre-lodgement and scoping background.
- **Section 4:** Summarises the statutory planning framework.
- **Section 5:** Summarises the strategic planning framework.
- **Section 6:** Summarises the compelling reasons why the Council should resolve to support the planning proposal and initiate the required amendments to the planning legislation.
- **Section 7:** Key features of the proposed development concept and reference schemes which are intended to demonstrate the intended outcome of the planning proposal.
- **Section 8:** Summarises the environmental impact assessment.
- **Section 9:** Comprehensive description and assessment of the requested planning proposal in accordance with the DPHI LEP Guidelines.
- **Section 10-13**: Mapping, consultation summary, conclusion and justification.

1.5. PROJECT TEAM

This Planning Proposal has been prepared through significant collaboration with the project team and is supported by a range of technical inputs as shown in **Table 1 and Table 2**.

Table 1 Planning proposal project team

Document	Consultant
Urban Design Report and Architectural drawings	3XN
Surveyor	LTS Lockley
Quantity Surveyor	RLB
Planner	Urbis
Traffic and Transport	ARUP
Heritage	Urbis
Pedestrian Wind	CPP Wind
Pedestrian Footpath Analysis	ARUP
Services	ARUP
Ecologically Sustainable Development	ARUP
Acoustic	ARUP
Public Art	Barbara Flynn Pty Ltd
Flooding	ARUP
Skyview Factor	BIM Consulting
Geotechnical	Douglas Partners
Stakeholder Engagement	Urbis
Rail Impact	ARUP
Waste	Foresight Environmental

1.6. ACCOMPANYING DOCUMENTATION

The Planning Proposal is accompanied by the following supporting documents as summarised in the table below.

Table 2 Accompanying Documentation

Document	Consultant	Appendix
VOLUME 1		
Urban Design Report, Envelope Plans and Concept Reference Schemes	3XN	**Appendix A**
Site Survey	LTS Lockley	**Appendix B**
Quantity Surveyor EDC Letters	RLB	**Appendix C**
Draft Site-Specific Development Control Plan	3XN/Urbis	**Appendix D**
Draft Design Excellence Strategy	Urbis	**Appendix E**
Statement of Intent – Public Benefits Letter of Offer	Stockland	**Appendix F**
Heritage Impact Statement	Urbis	**Appendix G**
Pedestrian Footpath Analysis	ARUP	**Appendix H**
Desktop Geotechnical Assessment	Douglas Partners	**Appendix I**
Services Report and Structural Design Description	ARUP	**Appendix J**
Stakeholder Engagement Plan	Urbis	**Appendix K**
Rail Corridor Impact Report	ARUP	**Appendix L**
Pedestrian Wind Assessment (both schemes)	CPP Wind	**Appendix M**
Skyview Factor report (both schemes)	BIM Consulting	**Appendix N**
VOLUME 2 – COMMERCIAL SCHEME		
Traffic and Transport Impact Assessment	ARUP	**Appendix O**
Acoustic Impact Assessment	ARUP	**Appendix P**
ESD Report	ARUP	**Appendix Q**
Preliminary Flooding Advice	ARUP	**Appendix R**
Utility Services Infrastructure Report	ARUP	**Appendix S**

Document	Consultant	Appendix
Preliminary Waste Management Plan	Foresight Environmental	**Appendix T**
VOLUME 3 – MIXED USE SCHEME		
Traffic and Transport Impact Assessment	ARUP	**Appendix U**
Acoustic Impact Assessment	ARUP	**Appendix V**
ESD Report	ARUP	**Appendix W**
Preliminary Flooding Advice	ARUP	**Appendix X**
Utility Services Infrastructure Report	ARUP	**Appendix Y**
Preliminary Waste Management Plan	Foresight Environmental	**Appendix Z**
Preliminary Public Art Strategy (both schemes)	Barbara Flynn	**Appendix AA**

2. SITE CONTEXT

2.1. SITE DESCRIPTION

The site is known as *Stockland Piccadilly Complex* and located at 133-145 Castlereagh Street, Sydney. It is irregular in shape, extends to an area of 4,800m^2 and contains two street frontages onto Castlereagh Street to the east (55m) and Pitt Street to the west (54m).

The site ownership, legal description, lease agreement, and easements are detailed in Table 3.

Table 3 Site details

Item	Detail
Legal Description	The site is legally described as Lot 10 in DP828419. The site is situated above part of Lot 141 in Deposited Plan 1231660 (Rail Corridor), which is a subterranean stratum of land acquired by Transport for NSW for the proposes of Sydney Metro. This is further detailed in **Table 3**.
Ownership	The site is owned by the Uniting Church in Australia Property Trust (N.S.W.).
Lease Agreement	Registered lease (Y517772) between The Uniting Church in Australia Property Trust (NSW) and Capital Land Corporation Pty Limited (now The Trust Company Limited) dated 2 August 1988 (the Head Lease). There is a registered sublease over Substation Premises No 6655 and No 6656 on the land, as well as the subleases recorded on Lease Folio 314.
Head Lease Term	103 years commencing on 2 August 1988 and ending on 1 August 2091.
Caveats or covenants	There are no caveats or covenants registered on title.
Easements	The site is not burdened by any easements. The site benefits from the following easement: ▪ An easement (O541870) over the adjacent Lot 1 in Deposited Plan 66194 (226-230 Pitt Street located to the south of the site fronting Pitt Street) and its air space for the maintenance and repair of any building on the site.
Registered Encumbrances	There are the following other encumbrances registered on title: ▪ a restriction on the use of land (AK904441) registered by the Sydney City Council, which provides that part of the building which has been constructed on the land pursuant to development consent, known as the "end of journey" facilities, has been excluded from floor space for the purposes of calculating floor space ratio ▪ a notice (AM711120) that the Property was subject to a proposed acquisition for the purposes of the Sydney Metro. Transport for NSW has now acquired the Rail Corridor, part of which is situated below the site.
Site Access	The site benefits from dual street frontages to Pitt Street (west) and Castlereagh Street (east), both functioning as one-way streets. ▪ Castlereagh Street is one-way southbound running from Hunter Street in the north to Hay Street in the south. Castlereagh Street generally provides

Item	Detail
	two traffic lanes and a dedicated bike lane reflecting the streets important transport function. ▪ Pitt Street, where it fronts the site, is one way northbound from Park Street (south) to the Pitt Street Mall (north) at the corner of Market Street. Pitt Street generally provides two traffic lanes and two paid parking lanes and loading zones on either side.

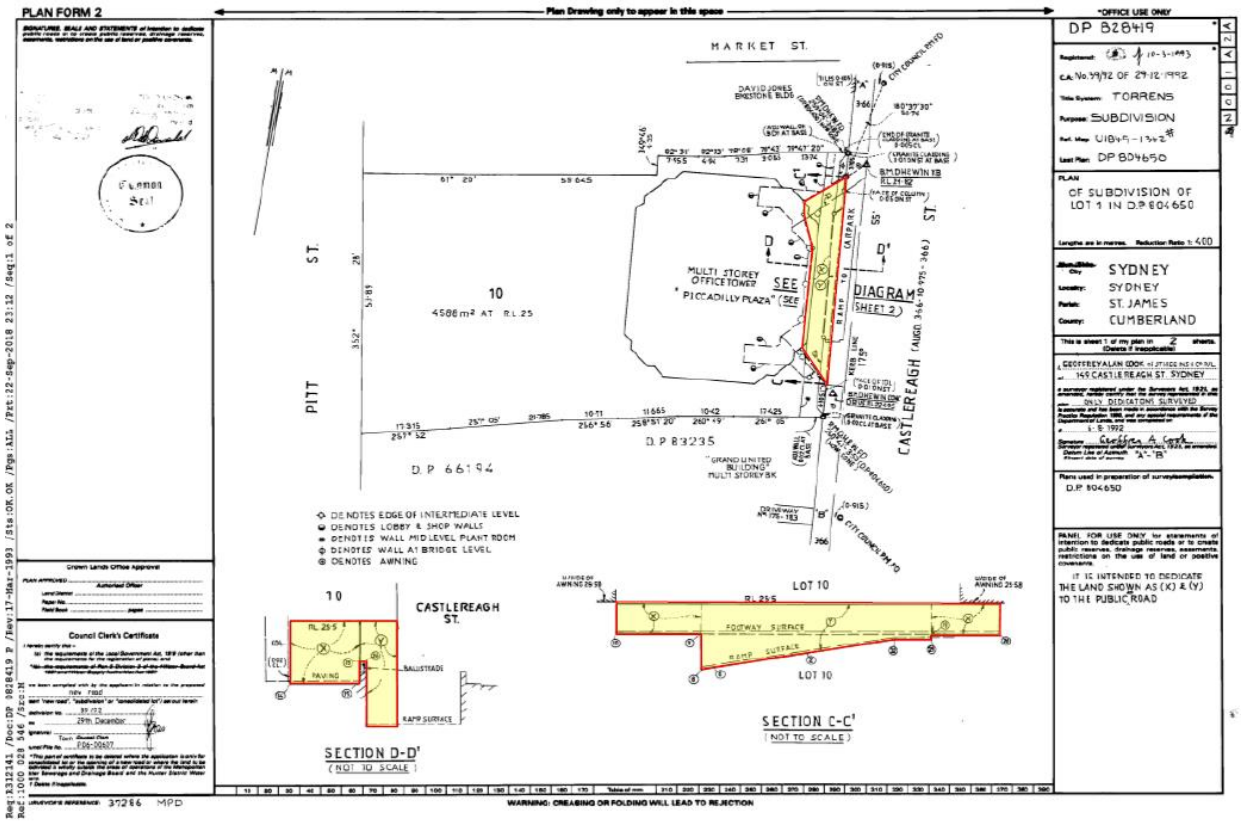
The existing carpark entry ramp (which runs parallel to the street) between RL 17.97 and 22.36 is dedicated as public road as highlighted in the plan of subdivision (refer **Figure 2**). As part of the redevelopment of the site, the parallel car park entry ramp is proposed to be removed and a single entry/exit located at the southern site boundary (which is the current exit from the car park). Therefore, with the existing entry ramp re-instated to a pedestrian footpath, the intention is that this land will be closed as public road and the land will be consolidated with Lot 10 in DP828419.

As illustrated in **Figure 3**, a portion of the site is overlapped by the Rail Corridor. The deposited plan identifies the affections and stratum limits on the site as follows:

Table 4 Affection and stratum limits on Lot 10 in DP828419 from the Rail Corridor

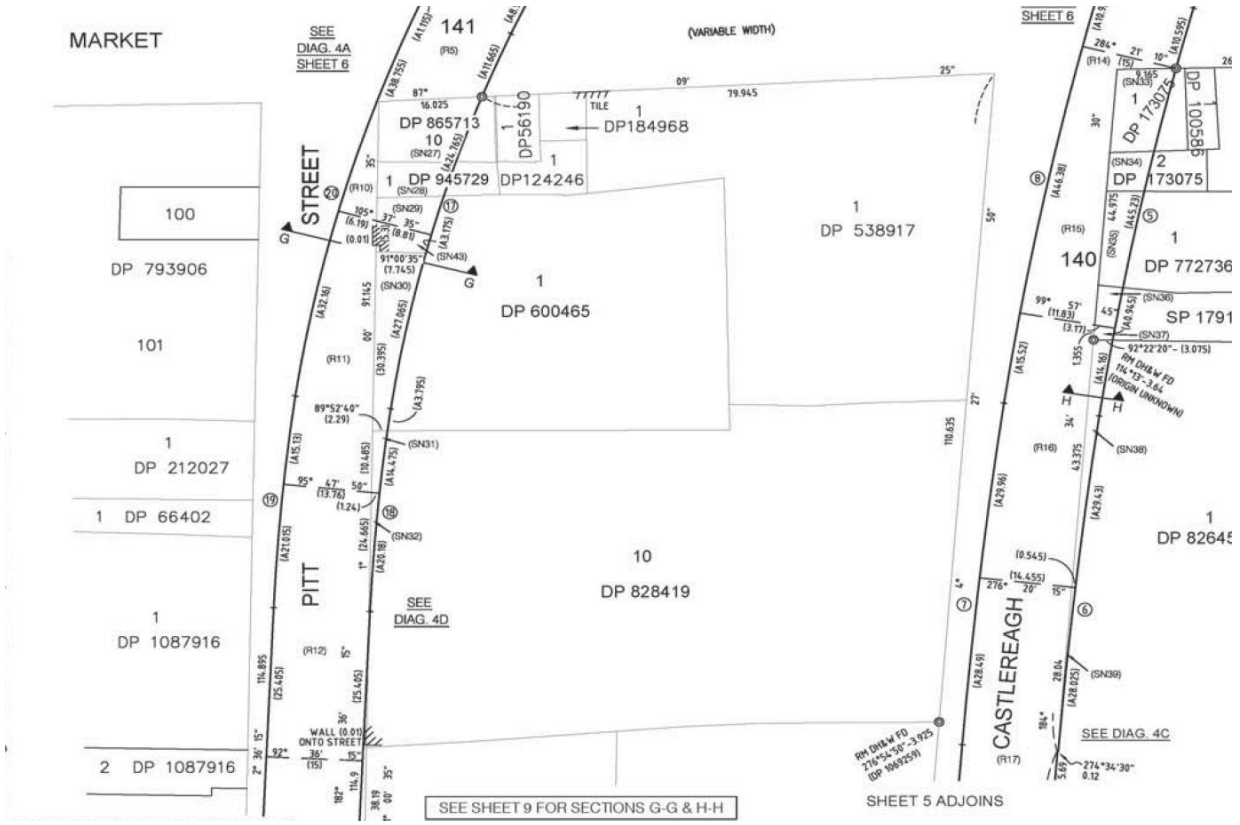
Approx. Ground Surface Level	Upper Stratum Limit	Lower Stratum Limit	Part Area (approx. m^2)	Total Area (approx. m^2)
RL 20	RL 0	RL -11.45	18	30
RL 20	RL 0	RL -9.5	12	

Figure 2 Plan of Subdivision



Source: NSW Land Registry Services

Figure 3 Extract from Deposited Plan 1231660



Source: NSW Land Registry Services

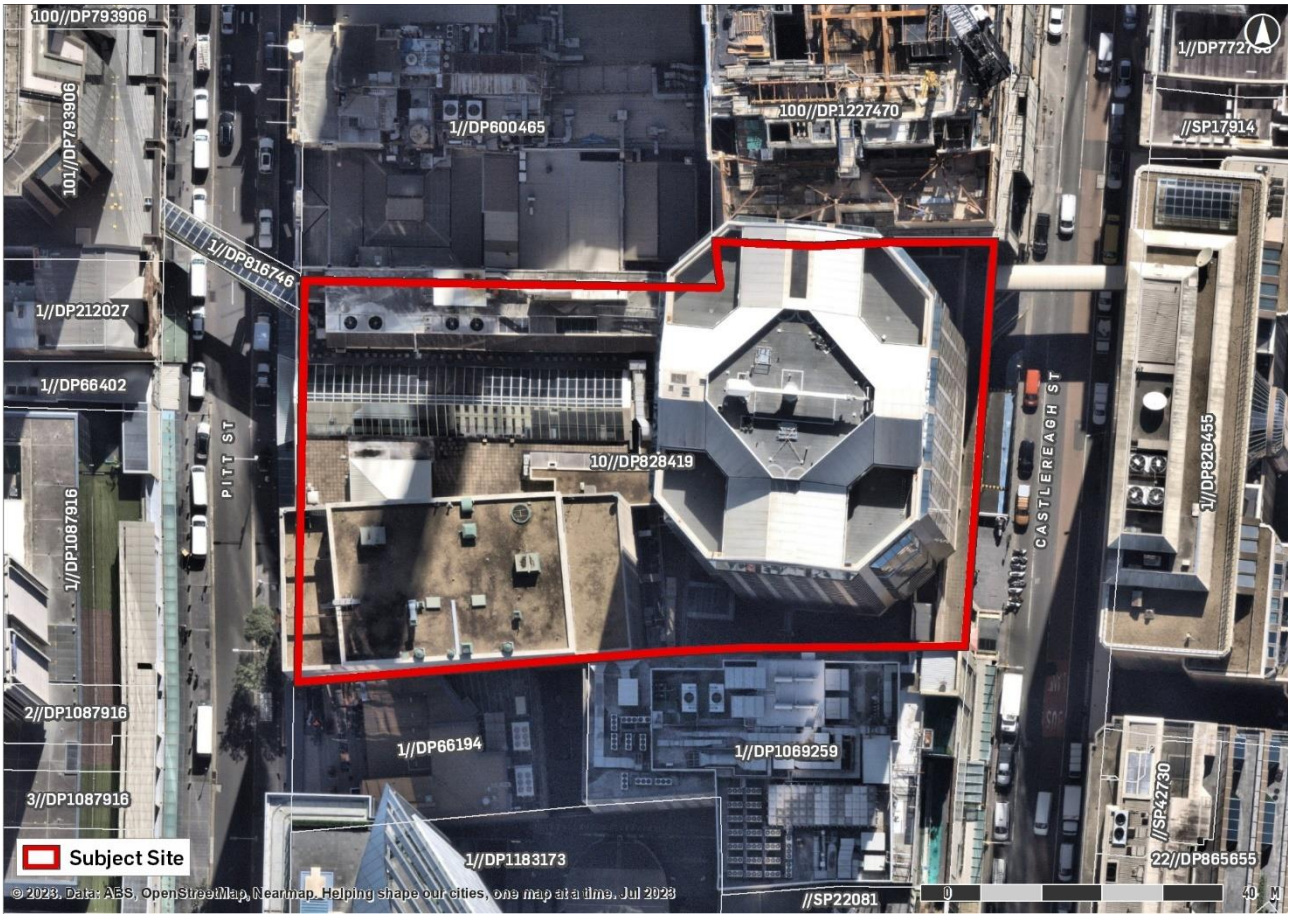
2.2. EXISTING DEVELOPMENT

2.2.1. Piccadilly Complex

As illustrated in the aerial image of the site is provided in **Figure 4,** the site currently comprises three buildings known as the 'Piccadilly Complex' completed in 1991 which has been the subject of progressive improvements to upgrade selected elements within the building. The site is used by Wesley Mission, who are a non-for-profit organisation founded by the Uniting Church which has history dating back to the early 1900's. This use includes Sunday Church services.

A site survey accompanies the Planning Proposal at **Appendix B**. The site slopes from east to west rising approximately 2.7m from Pitt Street to Castlereagh Street. The majority of the site is currently excavated to RL 3.6 accommodating 5 basement levels. The Piccadilly Court portion of the site is currently excavated to approximately RL16.8 accommodating a single basement level.

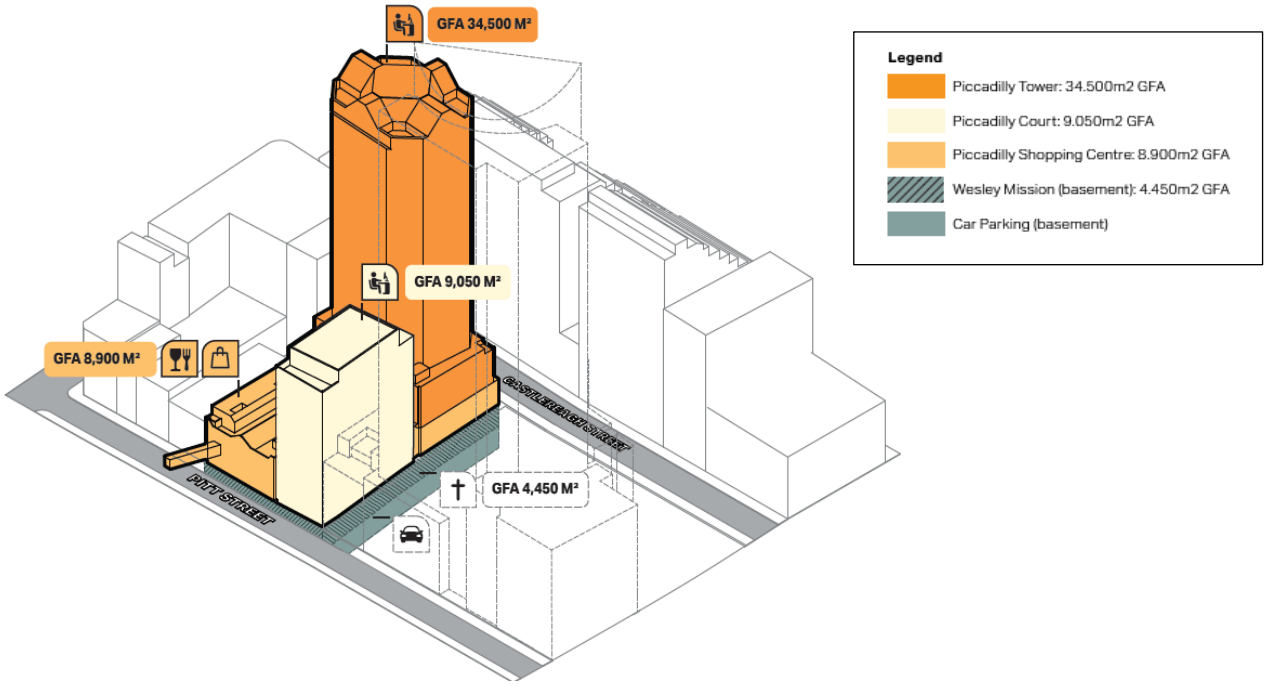
Figure 4 Site Aerial



Source: Urbis

The buildings currently occupying the site are detailed in **Table 5** and illustrated in **Figure 5.**

Figure 5 Site Aerial



Source: 3XN

Table 5 Description of existing buildings and improvements

Building	Description	GFA (m^2)
Piccadilly Court	Comprises a 14-storey office building completed in 1975 and first refurbished in 1991 with frontage to Pitt Street.	~ 9,050
Piccadilly Shopping Centre	Comprises a 2-storey retail building and the Wesley Mission facilities including the Wesley Church, Lyceum, Wesley Theatre and office space predominately located at lower ground and basement level. The Wesley Centre facilities comprise the following patron capacity: ▪ Theatre – 950 ▪ Lyceum – 277 ▪ Chapel – 534 A footbridge over Pitt Street connects the building to 55 Pitt Street to the west.	~ 8,900 ~ 4,450 (basement)
Piccadilly Tower	Comprises a 31-storey commercial building comprising office floor space and end of trip facilities and four basement levels of car parking accessed from Castlereagh Street. A footbridge over Castlereagh Street connects the building to the Sheraton On the Park located to the east of the site.	~ 34,500
Total (as per LTS Lockley survey)		**GFA= 56,890** **FSR = 11.85:1**

Photos of the current buildings on the site described above are provided in the figure below.

Figure 6 Images of Piccadilly Complex

Picture 1 Piccadilly Tower (Castlereagh Street)

Picture 2 Piccadilly Court (Pitt Street)

Picture 3 Piccadilly Shopping Centre and sky bridge

Source: Urbis (December 2024)

2.2.2. Sky Bridges

Two existing sky bridges connect the site to adjoining sites including:

- Pitt Street: connects the building to 55 Market Street to the west.
- Castlereagh Street: connects the building to the Sheraton On the Park located to the east of the site.

Consent will be sought via the detailed development application (DA) to demolish these sky bridges as part of the redevelopment of the site subject to settling lease arrangements with the relevant parties.

Figure 7 Sky Bridges – Pitt Street (left) and Castlereagh Street (right)

Source: Urbis (December 2024)

2.2.3. Car Parking and Access

The basement car parking formed part of the comprehensive redevelopment of the Piccadilly site which was completed in 1991. The Piccadilly site currently accommodates approximately 274 car spaces over 4 basement levels accessed from a ramp from Castlereagh Street.

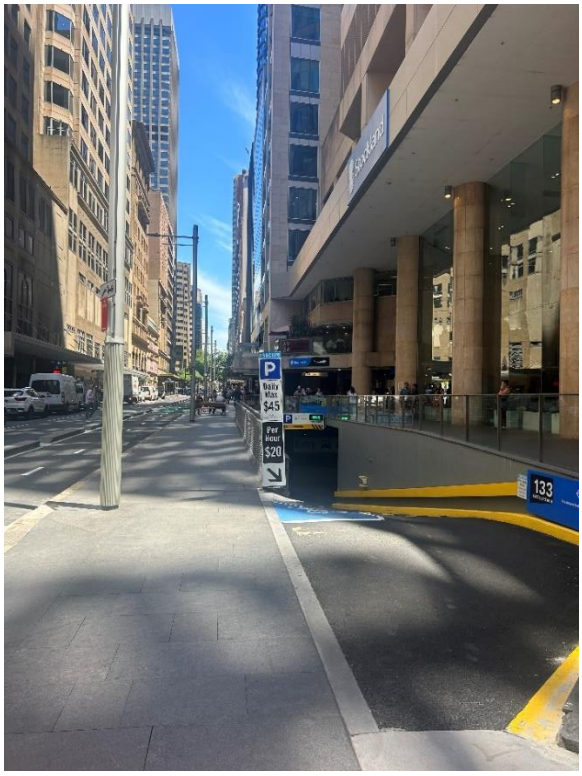
The car park is operated by Secure Parking and operates primarily as a public car park. Clause 8 of the ground lease agreement with The Uniting Church of Australia Property Trust (NSW) stipulates the allocation of certain car parking spaces to the landlord.

Of the total parking provided:

- 35 are permanently dedicated to the Uniting Church under the ground lease agreement,
- A further 225 car spaces are granted for use by the church on Sundays, Christmas and Easter as part of the ground lease agreement, and
- 2 car spaces are required to be dedicated for the childcare use as part of a DA condition – commenced in around 2007.

- Vehicle access to the site is currently from Castlereagh Street via a ramp that is parallel to the street which hinders a direct pedestrian pathway along Castlereagh Street. A vehicle exit is provided at the southern eastern boundary of the site at Castlereagh Street.

Figure 8 Site images of vehicular entry and access ramp



Vehicular entry

View of vehicular access ramp

Vehicular exit

Source: Urbis (December 2024)

View of vehicular access ramp

Source: Urbis (December 2024)

2.3. SITE CONTEXT

2.3.1. Existing Context

The site is located within a high-density mixed-use environment, surrounded by similar multi-storey buildings accommodating a range of land-uses.

The character of the locality is generally commercial in nature, however supports a variety of uses including retail, office, hotel and residential. To the north west of the site is Pitt Street Mall, a world class retail core which is anticipated to extend further south of Market Street. This is driven by the recently opened Sydney Metro City & future South West rail line which will improve connections within the CBD with the Pitt Street North Metro Station (located on the corner of Park, Pitt & Castlereagh Streets) expected to channel pedestrian movements north towards the site and Pitt Street Mall.

To the east of the site is a significant public open space corridor extending from Hyde Park through to The Domain and Royal Botanic Gardens. This provides amenity opportunities for the site as well as SAP constraints.

An aerial image illustrating the site's regional context is provided at **Figure 9.**

Figure 9 Aerial image

Source: 3XN

Specifically, the site's surrounding context can be described as follows:

- **North**: Directly adjacent to the north of the site is 65-77 Market Street at the corner of Castlereagh Street. The City Tattersall Club adjoins the site to the north fronting Pitt Street. Both of these sites accommodate mixed-use development with a significant proportion of residential use. Further north are Pitt Street Mall and Westfield Sydney, which both provide a range of shops, eateries, banking facilities and services.
- **East:** Directly adjacent to the east of the site is Castlereagh Street and further east is the Sheraton on the Park Hotel and Hyde Park.
- **South**: Directly adjacent to the south of the site along Pitt Street is the former Bank of NSW building which comprises a six storey building which currently contains a small-scale retail tenancy. Adjoining the

site to the south along Castlereagh Street is 151 Castlereagh Street which is a 13 storey commercial office building with ground floor retail tenancies. Further south at 161 Castlereagh Street is a recently constructed 43 storey premium office tower with ground floor retail and a penthouse residential apartment known as ANZ tower and Liberty Place.

- **West**: Directly adjacent to the west of the site is Pitt Street. Further west is the Hilton Hotel, Queen Victoria Building and Town Hall Square.

2.3.2. Future Context

Three sites located within the same block as the site have recently been the subject of major redevelopment applications as illustrated in Figure 10 including:

City Tattersalls Club (194-204 Pitt Street):

- Approval granted in November 2019 to D/2018/1246 for a concept DA establishing a building envelope and uses comprising a mix of retail, registered club indoor recreation facility, tourist and visitor accommodation and residential accommodation (indicatively 246 apartments) within a building envelope of a maximum height of 168m.
- Approval was subsequently granted in November 2021 to D/2021/203 for a detailed DA for the construction of a new mixed use development to a maximum height of RL 185.916 AHD, with hotel, residential and club land uses in a 50 storey podium and tower, including 101 hotel rooms, 241 apartments, demolition of the building at 196 Pitt Street, alterations and additions to the heritage buildings at 194 and 198-204 Pitt Street, excavation for 5 basement levels and service vehicle access to Pitt Street.
- Construction works are currently underway.

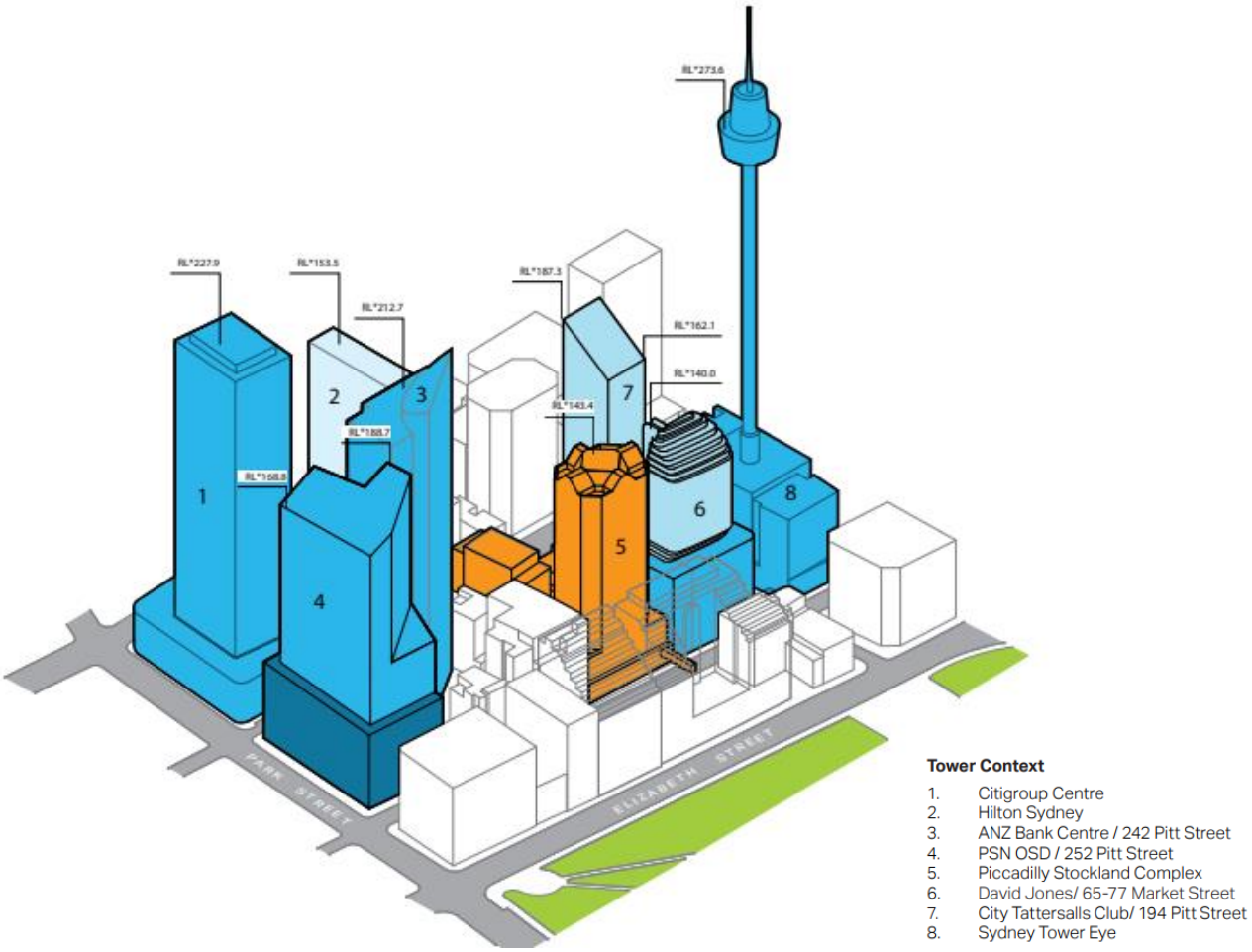
David Jones Building (65-77 Market Street):

- Approval granted in April 2020 to D/2019/263 for the construction of a 32-storey mixed-use building, incorporating the conservation, refurbishment and fit out of the existing 10-storey heritage building and construction of a 22- storey tower above the heritage item.
- Construction works for the mixed-use building are nearing completion.

Pitt Street North Over Station Development:

- The Minister for Planning and Public Spaces (the Minister) granted development consent to the Concept State significant DA (SSD-8875) in June 2019. Concept approval was granted for:
  - A maximum building envelope, including street wall and setbacks for the over station development
  - A maximum building height of RL 188.74 metres
  - A maximum gross floor area of 50,310m² (including station floor space)
  - Podium level car parking for a maximum of 50 parking spaces
  - Conceptual land use for either one of a mixed-use or commercial scheme (not both).
- The Minister subsequently granted development consent to the detailed State significant DA (SSD-10375) on 26 February 2021 for the construction of a commercial office tower with a maximum building height of RL 176.8 and a maximum gross floor area of 55,743 m2 (including gross floor area approved under CSSI 7400), staged stratum subdivision, signage zones and use of the podium for commercial lobbies, retail tenancies, 200 bicycle storage, 40 car parking spaces, loading, plant and circulation.
- This development is completed and operational.

Figure 10 Building envelope model of urban context



Massing diagram (above)

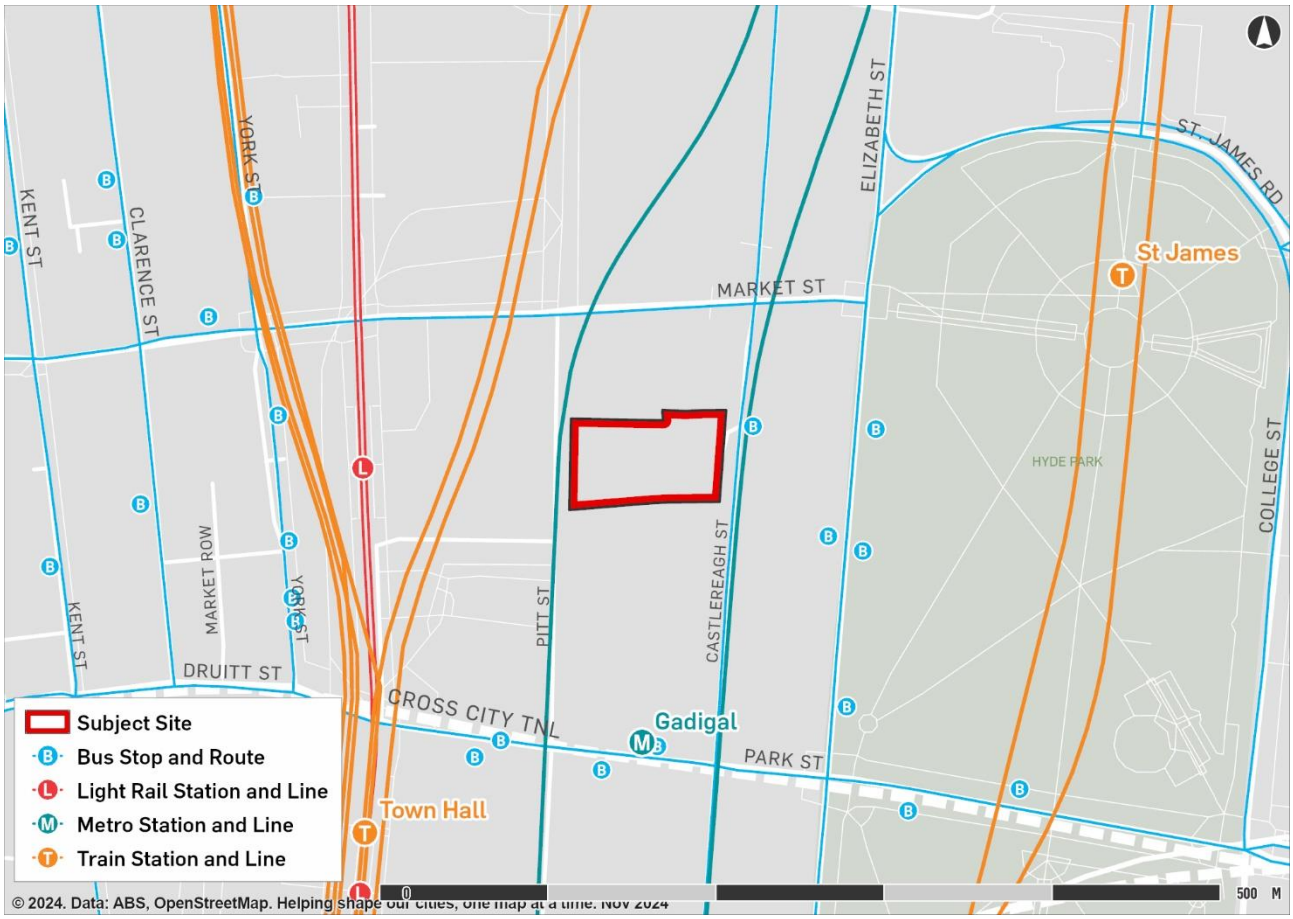
Context plan of city block between Market Street and Pitt Street

Source: 3XN

2.4. PUBLIC TRANSPORT INFRASTRUCTURE

The site is ideally located within close walking distance to public transport services as illustrated in **Figure 11** and described below.

Figure 11 Public transport map



Source: Urbis

- **Train**: St James Station, which is a stop on the City Circle Loop and Town Hall Station, is serviced by the T2 (Inner West), T1 (North Shore and Western Line), T9 (Northern Line), T4 (Eastern Suburbs and Illawarra Line), South Coast Line, T8 (Airport and South), and T3 (Bankstown Line).
- **Light Rail**: the QVB stop is located to the west of the site along George Street which is serviced by the CBD and South East Light Rail which travels north to Circular Quay and South east to Kingsford and Randwick.
- **Pedestrian and Cycleways**: networks are located within the immediate locality providing connections to key surrounding land uses.
- **Sydney Metro**: The operational Pitt Street North Metro station known as 'Gadigal' is located south of the site within the same street block.
- **Bus:** Bus corridors throughout Central Sydney were recently reorganised in accordance with the Sydney City Centre Access Strategy, which sought to redesign the Sydney CBD bus network to include new and improved services through a number of key corridors.
- There are numerous bus services in the vicinity of the site, with the following key bus corridors close to the site:
  - Castlereagh Street is a key corridor for southbound bus services travelling towards the Inner West and South.
  - Elizabeth Street, one block east of the site, acts as a major north-south bus route through the CBD. Travelling north, Elizabeth Street provides access to Martin Place and Circular Quay, as well as the

metrobus network, which provides services to major nodes across Sydney. Travelling south, Elizabeth Street provides access to the Inner South and Eastern Suburbs.

  - Park Street provides east-west bus access through the CBD, providing access to services across the Anzac Bridge to Victoria Road and the north-west, as well as additional access to the Eastern Suburbs.

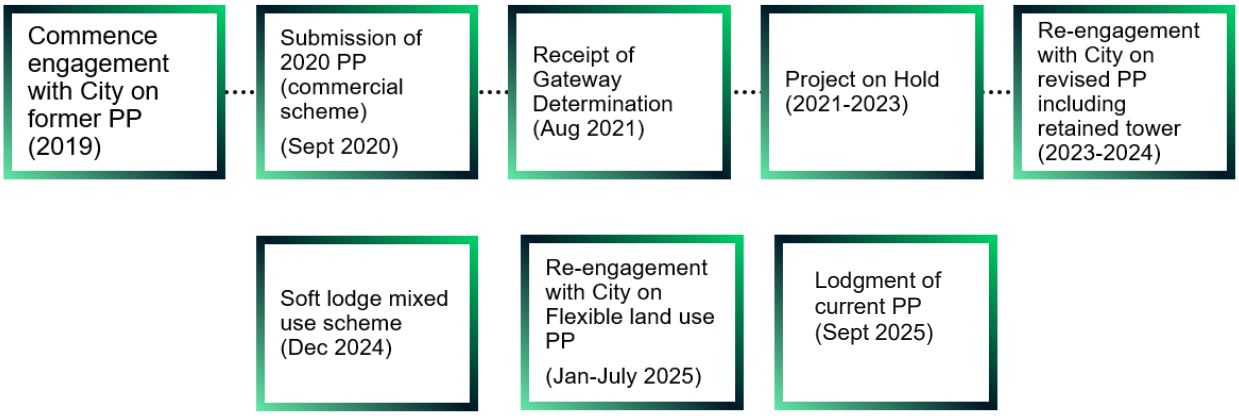
- The site also benefits from proximity to the Queen Victoria Building bus interchange, which provides access to the North Shore, Northern Beaches, Inner West and Hills District.

3. PRE-LODGEMENT / SCOPING BACKGROUND

3.1. SITE HISTORY

Stockland has been in consultation with the Council since 2019 to discuss opportunities to upgrade the quality of the current Piccadilly Complex to achieve additional contemporary employment floor space and complementary land uses as well as improve its contribution to the fabric of Central Sydney.

A summary of the timeline of the project is below with some key items discussed.



3.2. PRE-LODGEMENT ENGAGEMENT

Following the change in direction by Stockland seeking a more environmentally sustainable outcome and with the inclusion of residential land use, a number of meetings occurred with the Council from March 2024 to October 2024.

It is noted that many planning and design matters had been resolved in varying degrees given the advancement of the former PP, however key matters still needed to be tested and addressed with Council including a revised envelope, confirmation of a planning pathway to enable a portion of residential on site, rectification of the SAP breach, structural considerations associated with the building envelope and through site link and access, loading and parking arrangements.

The project team has engaged closely with the Council in an effort to resolve key issues. A series of meetings have been held with the project team and the Council to discuss key considerations with the PP:

- Building massing, envelope and GFA
- Urban design and built form impacts
- Structural complexity and constraints
- TSL design and ground plane response
- Alignment with strategic planning policy
- Car parking provision and site access
- Equivalence testing: Wind and sky view factor assessment
- Feedback from the Design Advisory Panel (DAP) in 28 November 2024
- The shifting economic market, the importance of ESG/retained carbon and development certainty has led to the subject Planning Proposal seeking optionality in the end land use.
- Recent discussions were held with the City from January to July 2025 including a meeting on 24 June 2025 which discussed the matters of:

- Mixed use challenges
- Planning Proposal flexibility (which can facilitate a commercial or a mixed use outcome)
- Minor adjustments to envelopes including a minor change to the Pitt Street upper podium
- Approach to car parking and LEP provisions

4. STATUTORY FRAMEWORK

4.1. LAND USE ZONE AND PERMISSIBILITY

The Sydney LEP 2012 is the primary planning instrument that applies to the site.

The site is zoned SP5 Metropolitan Centre pursuant to the Sydney LEP 2012 (refer **Figure 12**). The zone objectives and permitted uses are illustrated in the following table.

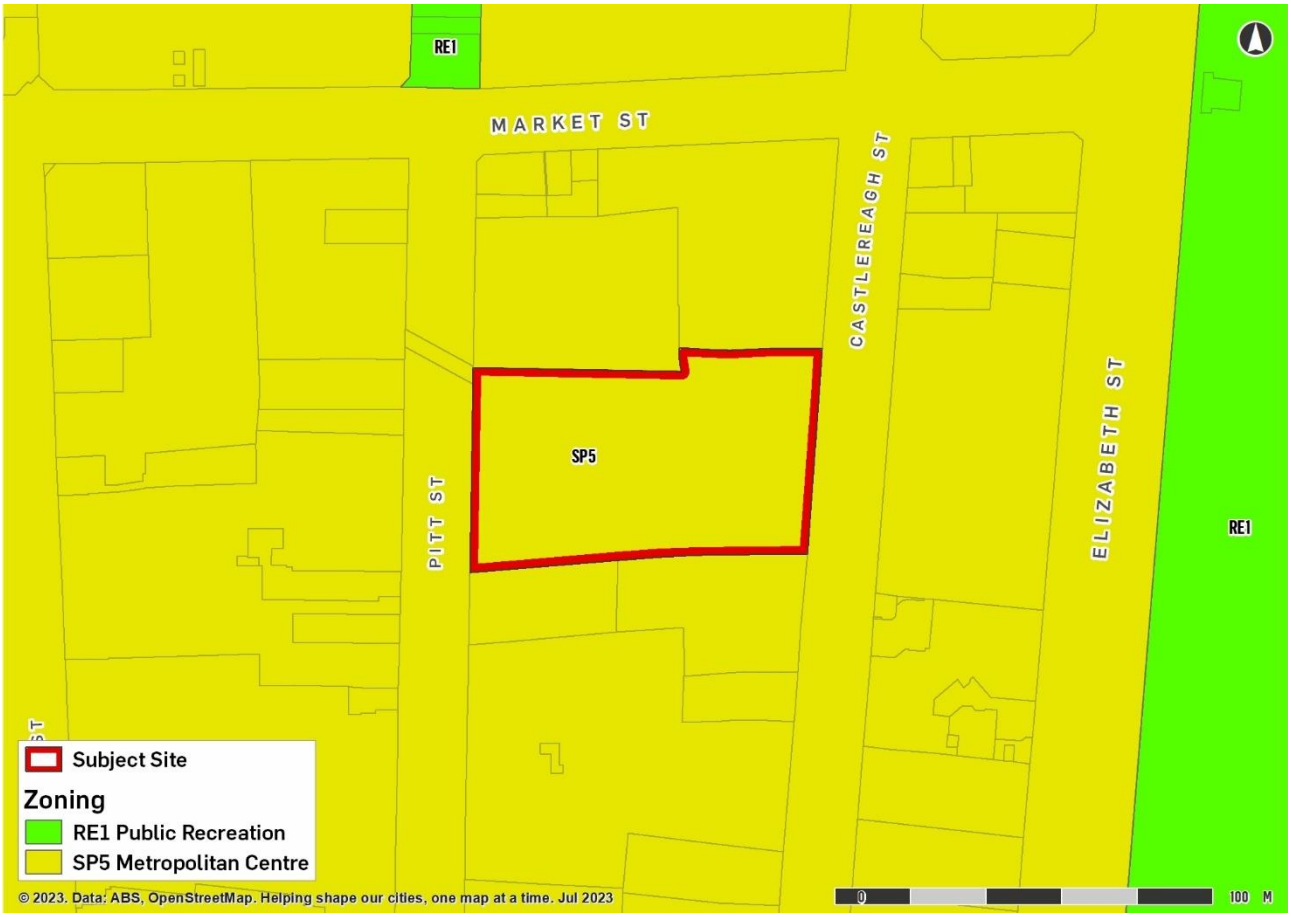
The concept schemes comprise the following potential land uses:

- Commercial premises
- Residential accommodation
- Place of *public worship*

Table 6 SP5 Metropolitan Centre Zone objectives and permissible uses

Item	Description
Zone Objectives	▪ *To recognise and provide for the pre-eminent role of business, office, retail, entertainment and tourist premises in Australia's participation in the global economy.* ▪ *To provide opportunities for an intensity of land uses commensurate with Sydney's global status.* ▪ *To permit a diversity of compatible land uses that are characteristic of Sydney's global status and that serve the workforce, visitors and wider community.* ▪ *To encourage the use of alternatives to private motor vehicles, including public transport, walking and cycling.* ▪ *To promote land uses with active street frontages within podiums that contribute to the character of the street.* ▪ *To promote the efficient and orderly development of land in a compact urban centre.* ▪ *To promote a diversity of commercial opportunities varying in size, type and function, including new cultural, social and community facilities.* ▪ *To recognise the important role that central Sydney's public spaces, streets and amenity play in a global city.* ▪ *To promote the primary role of the zone as a centre for employment and permit residential accommodation and serviced apartments where the accommodation complements employment-generating land uses.*
Permissible land uses	All land uses are permissible within the SP5 zone except for *Pond-based aquaculture*.

Figure 12 Zoning Map



Source: Sydney LEP 2012

4.2. LEP PLANNING PROVISIONS

Local planning provisions outlined in Part 4 – Part 7 of the Sydney LEP 2012 are outlined below.

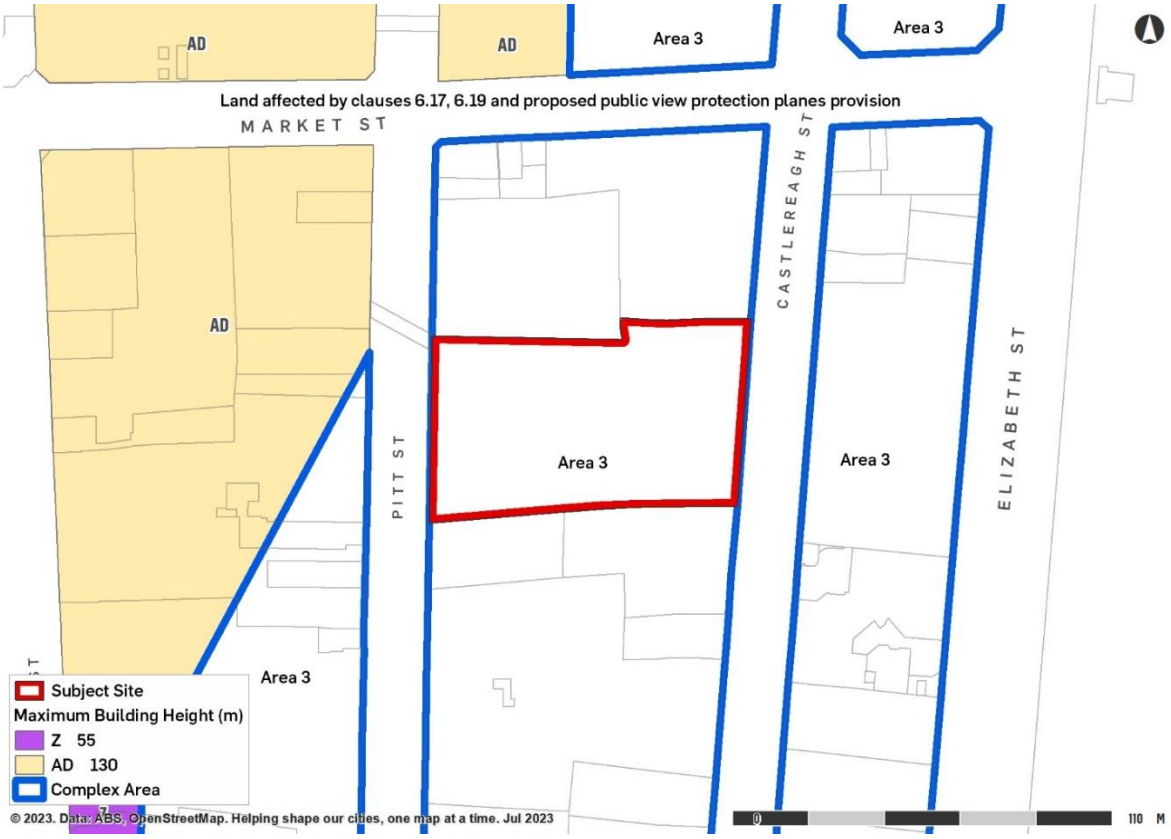
Table 7 Key Sydney LEP 2012 planning provisions

Item	Description
Height of Building and Sun Access Plane	There is no maximum building height control in metres applicable to the site. Instead, the maximum height of buildings on the site is determined by the Hyde Park SAP under clause 6.17 of the LEP. The SAP provides sun light protection to Hyde Park between 10am – 2pm all year and is described in Part 4 of Schedule 6A of the LEP. The sun access plan maps are included in Section 5.1.7 of the DCP which is further detailed in Section 3.3.2 of this report.
Floor Space Ratio	Under the current LEP, the site is subject to a base FSR of 8:1. As the site is located within Area 2 on the FSR map within the LEP, it is also eligible for additional floor space of: ▪ 4.5:1 for business premises, educational establishments, entertainment facilities, function centres, health services facilities, information and education facilities, light industries, office premises or retail premises ▪ 6:1 for centre-based child care facilities, community facilities or hotel or motel accommodation

Item	Description
	In addition to accommodation floor space, the site is potentially eligible for additional floor space pursuant to Clauses 6.5 – 6.9 and 6.21D of the LEP. This includes: ▪ an additional 10% bonus floor space provision if a competitive design process is undertaken and design excellence is demonstrated. ▪ a maximum 0.3:1 bonus floor space provision where end of trip facilities are provided. ▪ a floor space bonus equal to the area of existing car parking in any part of a basement of a building changed to any other use. ▪ a floor space bonus equal to the area of a community loading dock facility or shared loading dock facility with the basement of a building. ▪ a floor space bonus equal to the area of entertainment facilities or registered clubs provided within the basement of a building. ▪ a floor space bonus equal to (the lesser of) the amount of floor space created by any alterations or additions to the building, being floor space with a floor level no more than 5 metres above the ground level (existing), or the amount of floor space that can be achieved by applying a FSR of 0.8:1 to the building. A number of pre-conditions must be satisfied prior to granting of the opportunity site floor space. (note that this is proposed to be removed under the housekeeping LEP – see further below).
Heritage conservation	The site is not identified as a local heritage item in the Sydney LEP 2012, nor is it located within a Heritage Conservation Area. The site is located within proximity to the following local heritage listed items (refer Figure 14): ▪ I1888 – David Jones Department store including interior ▪ I1926 – Former Fay's Chambers, exterior only ▪ I1927 – Former Symonds buildings including interior ▪ I1928 – City Tattersalls Club (198-200 Pitt Street) including interior ▪ I1929 – City Tattersalls Club (202-204 Pitt Street) including interior ▪ I1930 – Banking House including interior ▪ I1931 – National Building including interior ▪ I1698 – Former Legion House including interiors ▪ I1699 – Community building Masonic Club including interior.
Car parking	The site is subject to the following maximum car parking rate pursuant to the LEP. ▪ For office premises, business premises and retail premises, the following formula is to be used: – M = (G x A) / (50 x T) – Where: – **M** is the maximum number of parking spaces, and

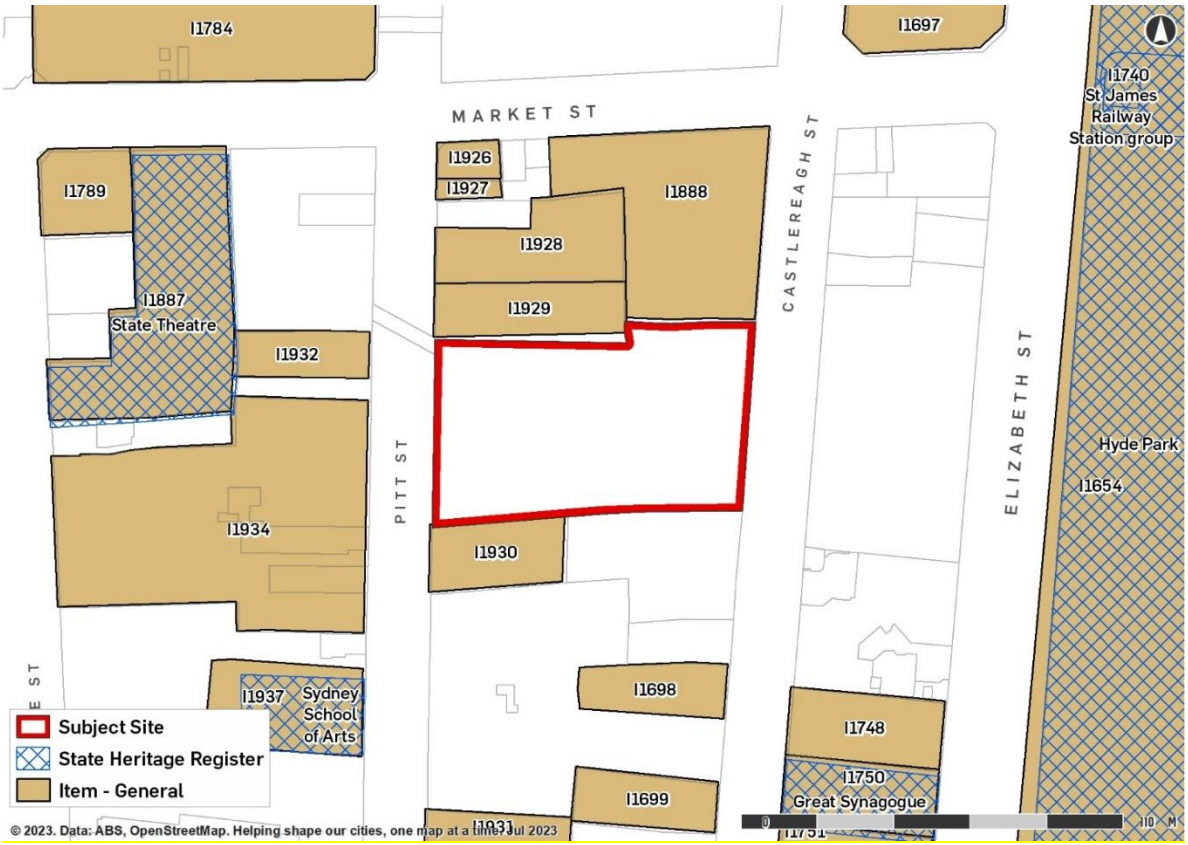
Item	Description
	– **G** is the gross floor area of all office premises / business premises / or retail premises in the building in square metres, and – **A** is the site area in square metres, and – **T** is the total gross floor area of all buildings on the site in square metres. – The above calculation does not apply to buildings that provide more than 2,000sqm of retail GFA. ▪ For places of public worship and entertainment: – 1 space for every 10 seats, or – 1 space for every 30 square metres of the gross floor area of the building used for those purposes Based on the provisions of Part 7 of the LEP, subject to the commercial scheme comprising Wesley, the proposed uses on the land generate a maximum parking provision of 290 spaces.
Affordable housing	Development on land in Central Sydney that creates more than 100sqm of gross floor area or results in the demolition of existing floor area and the subsequent creation, whether for the same or a different purpose, of more than 100 square metres of gross floor area, is required to pay an affordable housing levy contribution by way of a condition of development consent.
Airspace operations	As the site is located within the prescribed airspace of the Sydney Kingsford Smith Airport, any development on the site which penetrates the Obstacle Limitation Surface (**OLS**) or the Procedures for Air Navigation Services Operations Surface (PAN-Ops) must be referred to the Civil Aviation Safety Authority (CASA) for concurrence.
Opportunity Site	The Piccadilly site is a nominated and mapped Opportunity Site which is eligible for additional floor space where refurbishments to the ground plane are proposed. (see section 4.3).
Design Excellence	Development consent must not be granted unless, in the opinion of the consent authority, the proposed development exhibits design excellence. A competitive design process is required to be taken to inform a future DA as the site meets the thresholds which includes, for development in Central Sydney over 55m. The future detailed design development application for the site will be subject to a design competition in accordance with the draft design excellence strategy at **Appendix E.**

Figure 13 Maximum height of building Map



Source: Sydney LEP 2012

Figure 14 Heritage Map



Source: Sydney LEP 2012

4.3. DRAFT LEP PLANNING PROVISIONS

4.3.1. House-Keeping Amendments LEP (PP-2024-709)

At the Council meeting on 11 December 2023, a Planning Proposal known as the 'Policy and Housekeeping Amendment' was supported by Council for submission to DPHI for a Gateway Determination and public exhibition. The Housekeeping Amendment PP was supported by amendments to a number of Council policies, including the Sydney DCP 2012 and the City of Sydney Competitive Design Policy.

Gateway Determination was issued on 29 October 2024.

Key changes of relevance to this PP include:

- Repeal of clause 6.9 – Opportunity sites.
- Amendment to design excellence provisions and the City of Sydney Competitive Design Policy.
- Reduction of maximum permitted car parking rates across the LGA.
- Amendments to the Sydney DCP 2012 related to future design development.

At the time of preparation of this report, the Housekeeping Amendment has been adopted by Council and is now awaiting legal drafting and finalisation.

4.3.2. Affordable Housing Contributions Review (PP-2024-2747)

At the Council Equity and Housing Committee on 9 December 2024, a Planning Proposal known as the 'City of Sydney Affordable Housing Contributions Review PP' was presented to the Council with a recommendation to be referred to DPHI for Gateway Determination and public exhibition. The Affordable Housing Contributions Review is also supported by a draft City of Sydney Affordable Housing Program Amendment 2024.

Key changes of relevance to this PP include:

- Amendment to monetary contribution in the Affordable Housing Program.
- Amendment to Clause 7.13 – relevant to local development and 7.13B – relevant to planning proposals. Specifically for Central Sydney, this includes:
  - A 20% affordable housing levy to be applied to residential floor space that results from a Planning Proposal.
  - A 2% affordable housing levy to be applied to additional non-residential floor space that results from a Planning Proposal.
- Change in the methodology by which to calculate contributions from 'total floor area'/TFA to 'Gross floor area'/ GFA.

On 30 July 2025, The Department issued a Gateway Determination.

The draft LEP is on not yet made and is on public exhibition from 25 August to 7 October 2025.

4.4. SYDNEY DEVELOPMENT CONTROL PLAN 2012

The following section provides an overview of the key built form DCP controls applying to the site which would apply to the redevelopment of the site for the purposes of the end scheme.

4.4.1. Key Built Form Controls

The key built form controls for development in Central Sydney that are applicable to the site pursuant to the DCP are detailed in **Table 8**.

Table 8 Built Form DCP Provisions

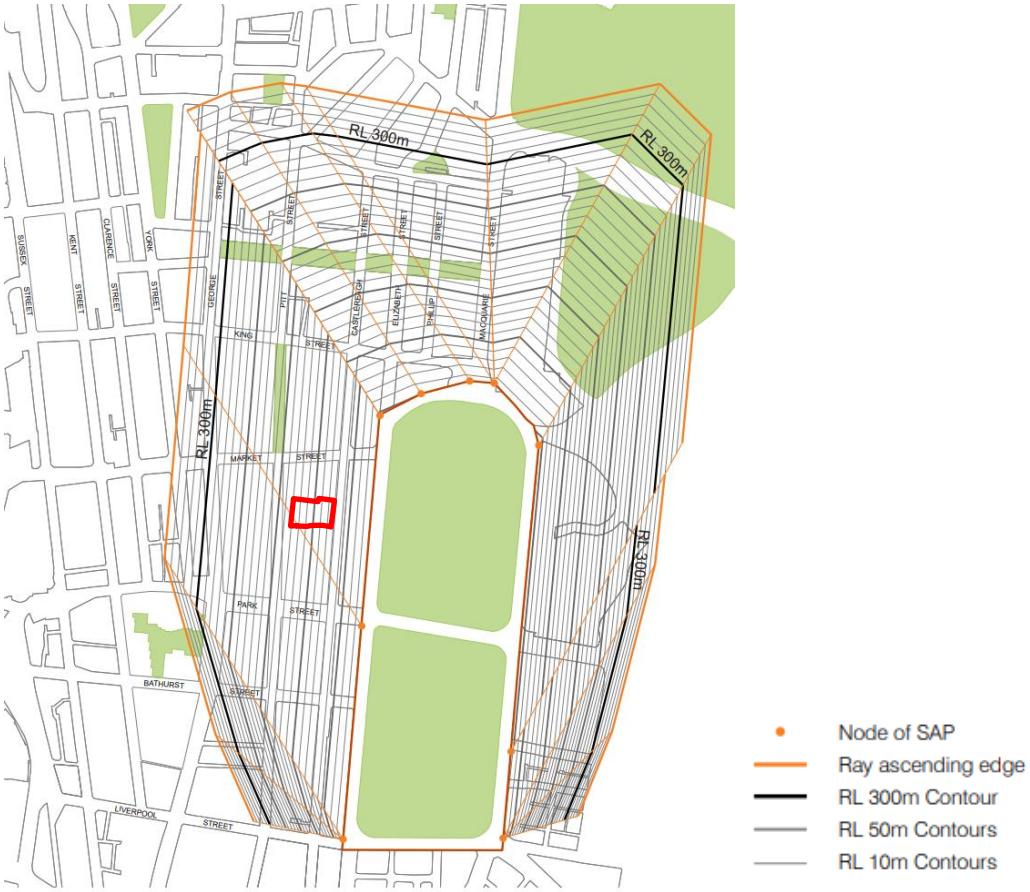
Matter	Built Form Control				
Street Frontage Heights	**Control**	**Up to 55m**	**Greater than 55m up to 120m**	**Greater than 120m**	
	Street Frontage Height	20-35m	20-35m	20-25m	
Minimum Street Setbacks	**Control**	**Up to 55m**	**Greater than 55m up to 120m**	**Greater than 120m**	
	Minimum Street Setback	8m or 6m where adjoining sites Street Setbacks are less than 6m	8m	8m	
	Variation to Street Setbacks may be permitted to building massing that provides equivalent or improved wind comfort, wind safety and daylight levels in adjacent Public Places relative to a base case building massing with complying Street Frontage Heights and Street Setbacks (i.e. variation to massing is governed by achieving equal or better performance).				
Side and Rear Setbacks and Building Form Separations	**Control**	**Up to 55m**	**Greater than 55m up to 120m**	**Greater than 120m up to 240m**	**Greater than 240m**
	Side and Rear Setback above Street Frontage Height	0m	4m	3.33% of the proposed total height of building	8m
	Building Form Separations	0m	8m	6.66% of the proposed total height of building	16m
	Variation to Side and Rear Setbacks and Building Form Separations may be permitted to building massing that provides equivalent or improved wind comfort, wind safety and daylight levels in adjacent Public Places relative to a base case building massing with complying Side and Rear Setbacks (i.e. variation to massing is governed by achieving equal or better performance).				
Building Form Massing, tapering and maximum dimensions	Above Street Frontage Height the maximum horizontal dimension of a building including all external elements (for example architectural elements like horizontal or vertical fins) measured in any direction (including diagonally across the site) is not to exceed:				

Matter	Built Form Control
	▪ 100m for all developments other than residential accommodation and serviced apartments ▪ Above the Street Frontage Height, the total Building Envelope Area may occupy the following proportion of the site area less any areas of heritage items and required DCP setbacks: (a) 100% up to 120m above ground; (b) 90% above 120m up to 240m above ground; and (c) 80% above 240m above ground.

4.4.2. Sun Access Plane

Section 5.1.7 of the Sydney DCP 2012 outlines provisions for sun protection of parks and places. The site is subject to the Hyde Park SAP provisions within the DCP. Hyde Park is to be provided unobstructed sunlight from 10am to 2pm all year.

Figure 15 Extract of Hyde Park SAP Map and indicative location of site



Source: Sydney DCP 2012

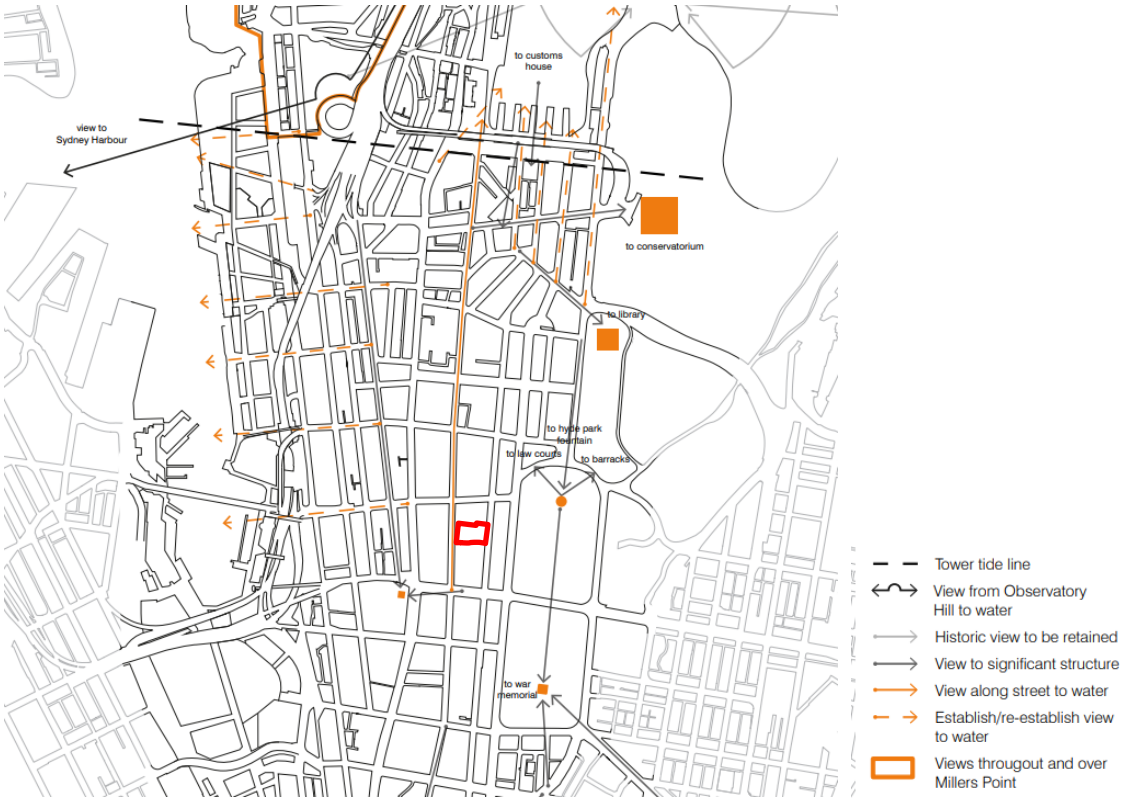
4.4.3. View Corridors

Section 5.28 of the Sydney DCP 2012 outlines provisions to protect views from public places.

The public view protection map identifies a view corridor north along the Pitt Street frontage of the development from Park Street to Circular Quay. The DCP 2012 identifies that development must not

encroach within any of the views nominated on the Public Views Protection Maps and where possible should improve the views to Sydney Harbour (surface of the water) through modulation of built mass.

Figure 16 Extract of view protection map and indicative location of site



Source: Sydney DCP 2012

4.4.4. Schedule 12 - Procedure to Vary Setback Controls

Schedule 12 outlines procedures for demonstrating compliance with variation provisions for street frontage height and setbacks, side and rear setbacks, building separations and tapering controls in Central Sydney.

Procedure A relates to street setback encroachment and compensating recess.

Procedure B can only be used for sites larger than 1000m^2. This procedure requires preparation of a base case model and equivalence reporting of:

- Equivalent or improved wind speed comfort values in m/second.
- Equivalent or improved daylight (or 'sky view factor') testing in adjacent Public Places.
- The proposed massing envelopes are compared against the base case (compliant). It is noted the DCP identifies a high level of prescription for this assessment. The DCP defines 'equivalent' as "very slightly 'better than' at a high level of accuracy".
- Where equivalent or improved wind comfort and daylight levels (determined by average Sky View Factor (**SVF**) in adjacent public places is demonstrated, variations may be permitted.

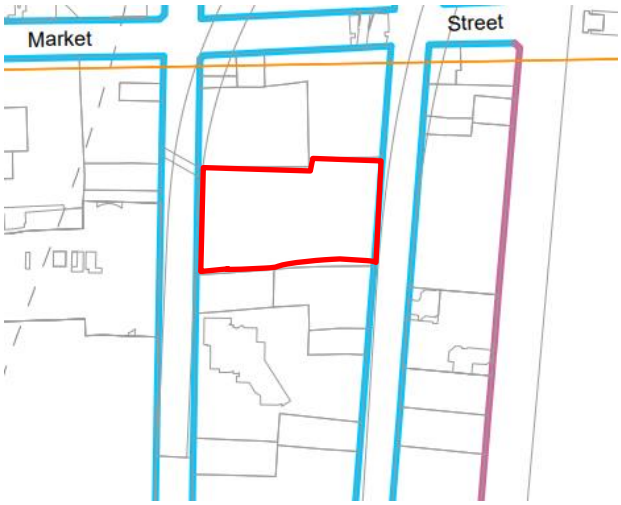
4.4.5. General Provisions

Section 3.1 and 3.2 of the Sydney DCP 2012 outline provisions for defining the public domain. Key provisions include:

- S3.1.2: Through-site links are to be provided in the locations shown on the Through-site links map. A through-site link is identified connecting the site to the north (Figure 17).
- S3.2.3: The site is identified as requiring active frontages both to Castlereagh Street to the east, and Pitt Street to the west **(4)**.

- S3.24: The site is identified as requiring an awning on frontages both to Castlereagh Street to the east, and Pitt Street to the west.
- S3.25: Colonnades are generally not permitted as they obscure views of retail frontages and separate street frontage activity from the street.

Figure 17 Extract of public domain provisions map and location of site



Extract of through site link map

Source: Sydney DCP 2012

4 Extract of active frontages map

Source: Sydney DCP 2012

Section 3.6 of the Sydney DCP 2012 outlines provisions for ecologically sustainable development. Key provisions include:

- S3.6.1: Applications for new developments containing office premises with a net lettable area of 1,000sqm or more are to be submitted with documentation confirming that the building will be capable of supporting a Base Building NABERS Commitment Agreement of 5.5 stars.
- Applications for developments involving alterations, additions and refurbishments to existing office premises where the estimated cost of works is over $5 million, and contains a net lettable area of 1,000sqm or more, are to be submitted with documentation confirming that the building will be capable of supporting a Base Building NABERS Energy Commitment Agreement of 5 stars.

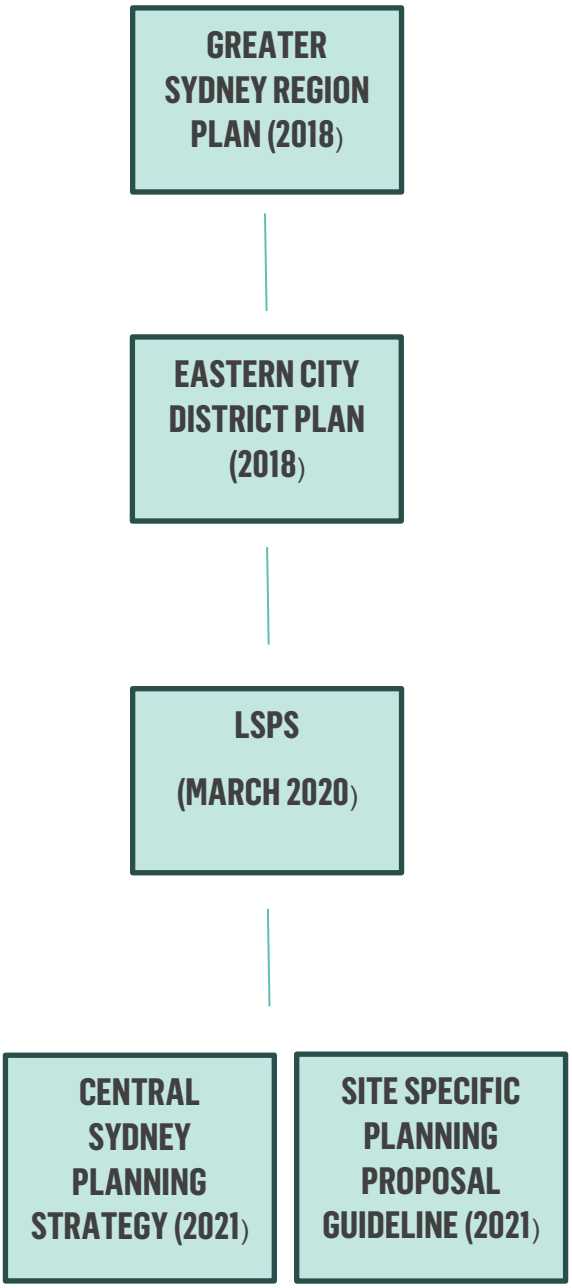
Section 3.11 of the Sydney DCP 2012 outlines provisions for vehicular access and parking. Key provisions include:

- S3.11.3: Bicycle parking is to be provided in accordance with the land use rates.
- S3.11.6: Service vehicle parking is to be provided in accordance with Schedule 7 Transport, parking and access.
- S3.11.11: Vehicle access points are restricted in places of high pedestrian activity identified on the Pedestrian priority map. The pedestrian priority map identifies the site's frontages to Pitt Street and Castlereagh Street are identified as not being preferred for additional vehicular access points.

5. STRATEGIC FRAMEWORK

5.1. REGIONAL AND LOCAL POLICIES

The following table summarises the strategic planning framework guiding future development on the site. An assessment of the Planning Proposal against these policies is provided in the following section.



A Metropolis of Three Cities – The Greater Sydney Region Plan (March 2018) is the NSW Government's overarching strategic plan for growth and change in Sydney. The 20 year plan provides a 40 year vision that seeks to transform Greater Sydney into a metropolis of three cities.

It identifies key challenges facing Greater Sydney, including a projected population increase of 1.7 million and the associated requirements to deliver 725,000 new homes and create 1 million new jobs by 2036. The Plan outlines how Greater Sydney will manage growth and change and guide infrastructure delivery.

The **Eastern City District Plan** (March 2018) sets out the NSW Government's vision, priorities and actions for the Eastern District of the Greater Sydney area, which includes the City of Sydney. It establishes a 20 year vision for the Eastern District to be a global sustainability leader, managing growth while maintaining and enhancing liveability, productivity and attractiveness for residents and visitors. Planning priorities and associated actions for productivity, liveability and sustainability seek to deliver on this vision.

The Harbour CBD is identified in the Eastern District Plan as 'Metropolitan Centre' and 'Core Economic and Employment Centre'. A key objective of the Plan is to make the Harbour CBD stronger and more competitive. The Plan also identifies predicted growth in the CBD of 45,000-80,000 jobs.

The Council's **Local Strategic Planning Statement** (LSPS) 'City Plan 2036' (endorsed March 2020) sets the land use planning context, 20-year vision and planning priorities to positively guide change towards the City's vision for a green, global and connected city. The planning statement explains how the planning system will manage change to achieve the desired outcomes, and guides future changes to the City's controls, including those sought by proponents through planning proposals. A key measure identified in the LSPS is the implementation of the Central Sydney Planning Strategy.

The **Central Sydney Planning Strategy** (CSPS) was originally released in draft by the Council in 2016 and adopted in November 2021. The CSPS provides the strategic framework of planning policy applying across the Sydney CBD and is discussed in further detail below.

5.1.1. Central Sydney Planning Strategy

The CSPS was adopted in November 2021.

The CSPS provides the strategic framework of planning policy applying across the Sydney CBD. The CSPS is focused on delivering additional floor space to accommodate employment growth, protecting heritage and public spaces, and ensure infrastructure is provided for the growing City.

Targets for the CSPS include increasing jobs in Central Sydney by 1.24% per annum to 2036, and residents by 3.04% per annum to 2036. To achieve this growth, the CSPS outlines 10 key moves which the strategy applies to achieve these targets. The following are relevant to the development potential of the Acquired Land.

- Key Move 1 – Prioritise employment growth and increase capacity
- Key Move 2 – Ensure development responds to context by providing minimum setbacks for outlook, daylight and wind
- **Key Move 6 – Move towards a sustainable City with best practice energy and water standards and for growth sites to drive zero-net energy outcomes / Investigate provisions that reward the retention, refurbishment and upgrade of older office buildings**
- Key Move 7 – Protect, enhance and expand Central Sydney's heritage and public places

5.1.2. Guideline for Site Specific Planning Proposals

On 14 December 2020 the Council formally noted that the Site-Specific PP Guideline would be used to guide the preparation of planning proposals in Central Sydney. The Site-Specific PP Guideline was prepared to support the CSPS and enable development uplift to be achieved in Central Sydney on sites that are not within Tower Cluster Areas or alternatively select this pathway.

Section 4 of the Site-Specific PP Guideline applies to strategic opportunity sites, and notes:

> *"For Solar Access Opportunity Sites proposed new buildings (or altered buildings) that rely on increased maximum heights and/or FSR controls may be any use permitted by Sydney LEP including* ***residential accommodation and serviced apartments."***

As relevant to the mixed use option, to qualify as a Solar Access Opportunity Site the Planning Proposal request must demonstrate how, and by how much existing overshadowing is being reduced to a protected space under Sydney LEP. The reduction in overshadowing is to ensure compliance with the SAP and remove an existing significant breach of more than 15 metres in height.

Response to Site-Specific PP Guideline

The Urban Design Report accompanying the PP outlines the existing height breach and how the building envelopes seeks to remove this breach, which has been discussed with Council extensively during the pre-lodgement process. Specifically, it is noted:

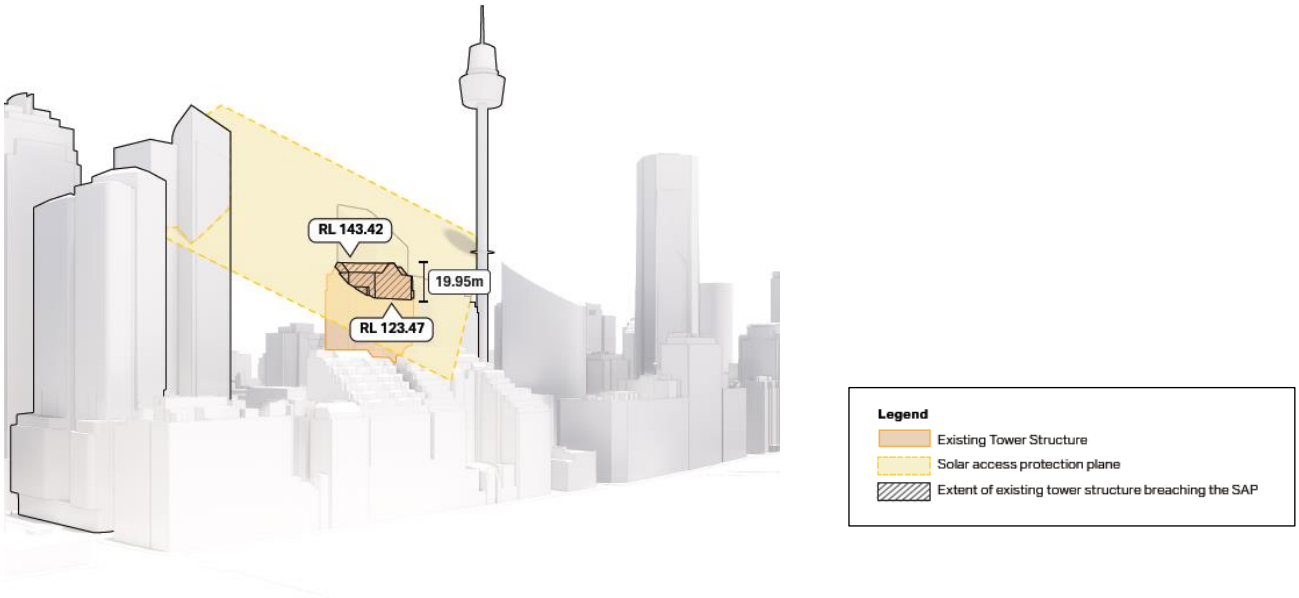
- The 14-storey Piccadilly Complex was competed in 1975, prior to the introduction of the Hyde Park SAP controls. Level 31 and plant was completed in the 1990's.
- The structure currently results in shadow to Hyde Park throughout the year at the winter solstice, equinoxes, and summer solstice. The quantum of shadow on the protected space is illustrated in Fi**gure 18** and as follows:
  - 21 June: 1647sqm between 1.45pm – 2.15pm
  - 23 September: 1564sqm between 2.30pm – 3pm
  - 21 March: 1109sqm between 3:30pm – 4pm
  - 21 December: 1331sqm between 4.15pm – 4.45pm

Figure 18 Extract of existing shadow impact on Hyde Park

Source: 3XN

The breach in the Hyde Park SAP is caused by the upper three levels of the existing building, in addition to roof plant, which has a total height of approximately 19.95m and 850sqm of GFA. This is illustrated in elevation and 3D envelope form in **Figure 19.**

Figure 19 Existing SAP breach



Source: 3XN

The building envelopes have been prepared to inform the proposed planning provisions for the site and will result in a **complete removal of the 19.95m Hyde Park solar access breach** and a compliant future development on the site as illustrated in the 3XN shadow plans.

There is a strong net benefit in the removal of the SAP breach and rectification of this non-compliance.

In addition to the above, Section 8 of the Guideline outlines the minimum requirements for Requests lodged under the Guideline. The following table outlines a high-level assessment against each of the minimum requirements.

Table 9 Assessment against Guideline minimum requirements

Minimum Requirement * *unless otherwise stated by the Guideline.*	**PP**
new buildings cannot contain residential or serviced apartment floor space	The Guideline states that for Solar Access Opportunity Sites proposed new buildings (or altered buildings) that rely on increased maximum heights and/or FSR controls may be any use permitted by Sydney LEP including residential accommodation and serviced apartments. As outlined in the prior subsection, the site is a Solar Access Opportunity Site as it will result in the removal of a breach of the Hyde Park SAP.
a minimum Site Area of 1,000 square metres	The site has an area of 4,800m^2.
commit to participating in a full architectural design competition	The future detailed design development application for the site will be subject to a design competition in accordance with the draft design excellence strategy at **Appendix E**.
deliver capability for net-zero emissions, zero waste and water efficient outcomes	The development will target a range of ESD targets, including net zero carbon emissions target by 2050, as discussed in the Sustainable Design Strategy Reports prepared by ARUP.
demonstrate best endeavours to use land efficiently accommodating appropriate tower setbacks and outlook, and	The building envelope is informed by the surrounding context and seeks to utilise the land efficiently whilst retaining the existing tower and basement structure. This is discussed further in **Section 7.3.**
be accompanied by a cumulative assessment of footpath pedestrian capacity (see section 7)	A Footpath Analysis has been prepared by ARUP and is provided with the PP and discussed in **Section 8.4.1.**

The Request and future mixed-use development on the site can therefore be submitted to Council for assessment.

6. THE CASE FOR CHANGE

The site has the capacity and capability to accommodate additional density for the purposes of employment and residential floor space, to a materially greater extent than the current planning controls permit. Achievement of this additional floor space to create a viable development outcome and the associated arising public benefits requires amendment to existing planning controls. Justification for this is outlined below.

Increasing the site's employment generating capacity and land use diversity in line with the objectives of the City Plan 2036: Local Strategic Planning Statement

The proponent is committed to delivering a contemporary development meeting the expectations of modern commercial tenants and investors. The Sydney CBD has seen a continuous strong demand for employment generating uses that underpins its status as global central business district.

To ensure the Sydney CBD remains competitive and achieves its global status, both in terms of quantity, quality and availability of office floor space, the Proposal seeks to significantly enhance the employment generating capacity of the site, while also creating opportunity to diversify land use on the site.

The potential to integrate residential land use into the site in the skyrise of the tower provides the opportunity to diversify land use and reduce the delivery and market risk associated with a very large quantum of commercial office use. The ability to allow up to 15% of the floor space for residential use, reduces this delivery risk and enhances project delivery certainty. At a minimum, in the event that the mixed-use option is progressed, this will still enable the delivery of 80% of the available floor space (83,493sqm) as office premises, in addition to retail tenancies and/or Wesley facilities.

The proposed employment floor space will provide a range of employment opportunities that directly respond to market demand and need, with most uses supported within the Sydney CBD market within the future. The importance of worker well-being will be a key element of the commercial offering, catering for a diversity of workers as the market transitions to a more flexible, dynamic commercial future.

Further, the development will provide additional housing within Sydney CBD with access to jobs, services and transport consistent with the objectives of the Eastern City District Plan. If progressed, the mixed-use development of this site will generate diversity of development in the Sydney CBD centre and will support the Council's objectives for vibrant place making with future growth that is highly resilient and responsive to market factors. Notably, the residential land use is already permitted on the site and the mixed use scheme proposes less than the permitted 'base' residential FSR under the current Sydney LEP 2012.

Rectifying elements of the existing Piccadilly Complex which result in a sub-optimal public domain outcome

The existing Piccadilly Complex was completed in 1991. Since this time, the planning controls governing the site have significantly progressed to protect daylight access to Hyde Park and enhance public domain outcomes within Central Sydney. The rectification of the following elements of the current Piccadilly Complex result represent a significant opportunity to improve public domain outcomes:

- The eastern portion of the top of the existing building on the site breaches the Hyde Park SAP provisions meaning that it currently overshadows Hyde Park. The building envelope proposed through this Planning Proposal is consistent with the Hyde Park SAP resulting in no overshadowing of Hyde Park. This will ensure that the public can enjoy improved daylight access to Hyde Park between 10am and 2pm all year.
- The parallel car park access ramp on Castlereagh Street is a major obstacle and intrusion for pedestrians. In addition, the sky bridges over Pitt Street and Castlereagh Street represent a poor urban design outcome and obstruct daylight access and sky view from the public domain. In the concept reference schemes, the existing car park entry ramp is proposed to be consolidated with the existing exit ramp aligned to the south-eastern site boundary at Castlereagh Street. The existing sky bridges will also be removed.
- The existing site frontage to Pitt Street and Castlereagh Street includes colonnades which break up the frontage and diminishes its activation to the street. The enhanced amenity and activation of the street frontages and the removal of colonnades at the Pitt Street and Castlereagh Street frontages.
- The removal of "public parking" from the site to be replaced by a reduced car park capacity and restriction of use.

- The reference schemes will create a pedestrian through-site link which is accessible at all times and provides connection from Pitt Street through to Castlereagh Street. This will be a significant improvement to the existing through site passages which do not have a clear line of sight and are not universally accessible.

These measures will result in a greatly improved public domain outcome for the site and would only be possible through the comprehensive redevelopment of the site facilitated by this PP.

Exemplar sustainability outcome

This site presents an opportunity for a major regeneration project that will deliver an exemplary sustainability outcome and reinforce the Sydney CBD's global status as a leader in ESD policy and implementation. The development concept seeks to retain the majority of the existing tower and basement structure, potentially including existing Wesley facilities, and adaptively reuse and reimagine the structure for contemporary redevelopment.

The schemes will be an exemplar of sustainable architecture and minimise the environmental impact of the site redevelopment. Piccadilly's upcycling proposition considers its whole of life carbon which will be significant in the Sydney and global context.

Specifically, the retention of the structure could enable a significant reduction in embodied carbon, with up to a 60% reduction in carbon in comparison to a full demolition and re-build proposition. The future development further targets:

- Net Zero carbon emissions target by 2050,
- 6-Star Green Star,
- 5.5 star energy,
- 4.5 star water NABERs rating.

A case for land use flexibility

The site is eligible under Council's Guidelines for Site Specific Planning Proposals to be considered for both commercial and residential uses. This is a relatively unique characteristic of the site, due to the current breach to the solar access plane to Hyde Park, which is proposed to be remedied by the PP.

It should be stressed that notwithstanding the land use flexibility being sought, the redevelopment of Piccadilly would remain in land use terms predominantly commercial in character, reflecting as a minimum the delivery of over 80,000sqm of commercial office floor space. Therefore, the optionality in land use being sought through the Planning Proposal does not derogate this core objective of optimising the site potential for employment floorspace, but does so in a manner that provides a means for Stockland to manage delivery risk and provide project commencement certainty.

Seeking a Planning Proposal that allows for diversity of options in the final land use mix for the site is appropriate in the case of the subject site that involves:

- A consistent maximum GFA
- A predominantly commercial office scheme
- A capped maximum proportion of residential use (15%)
- Delivery of agreed public benefits and public domain outcomes regardless of the land use.

Stockland has demonstrated through the previous years of engagement with the City of Sydney that both a commercial scheme and a mixed use scheme have both strategic and site specific merit and each are capable of being supported.

Incorporating land use optionality at the PP stage enables Stockland to progress stakeholder engagement concurrently with the PP assessment, supporting a streamlined and expedited pathway to resolution. This approach ensures planning outcomes remain responsive to market conditions while maintaining momentum across key project milestones.

A large scale site in the Sydney CBD context with the ability to be fully redeveloped in accordance with strategic plans and policies

- The site possesses distinctive characteristics within the Sydney CBD context which renders it an attractive proposition for redevelopment. These characteristics include:
- Large site for renewal extending to a total area of 4,800m2
- Two significant street frontages, being Pitt Street to the west and Castlereagh Street to the east
- Iconic views to Hyde Park and Sydney Harbour beyond
- Close proximity to both new and existing public transport infrastructure
- The site is under single ownership and does not require amalgamation.

These characteristics enable the comprehensive redevelopment of the site which has the ability to:

- Deliver a variety of efficient, coherent and flexible office floorplates to accommodate future tenant needs and satisfy the shortfall in the market
- Create a vibrant mix of land uses in the heart of the city
- Address both site frontages resulting in an improved urban design outcome
- Deliver a publicly accessible east west link between the two street frontages at Castlereagh and Pitt Street.

For these reasons, we request that Council (as the relevant planning authority) resolve to initiate the amendment process under Section 3.33 and 3.34 of the EP&A Act and seek a 'Gateway Determination' from the NSW DPHI.

7. DEVELOPMENT CONCEPTS

7.1. OVERVIEW

The objective and intended outcomes of the proposed amendments to the Sydney LEP 2012 and supporting site specific DCP is to facilitate the redevelopment of the site and an exemplar upcycling outcome for either:

- a commercial scheme or
- a mixed-use scheme

Two building envelope options are proposed to establish the objectives, built form parameters and the site-specific FSR provision to be included in Part 6, Division 5 of the Sydney LEP 2012 and key design principles to be within the Sydney DCP 2012.

The envelopes set the maximum GFA achievable within the building envelope. This calculation has excluded certain area from the GFA calculation in accordance with the applicable LEP definition including building plant, circulation area, car parking, and servicing area. It also excludes design measures including building articulation zones and building core.

Two supporting concept reference schemes have been prepared to demonstrate how two different land use schemes could be delivered within the proposed planning controls (this is illustrated indicatively below). The two reference schemes are summarised as follows:

Concept Scheme #1

- Provides a predominately commercial office tower with ground floor retail and basement car parking.
- For the purpose of the reference design, this option retains Wesley facilities at ground level and lower ground level.

Concept Scheme #2

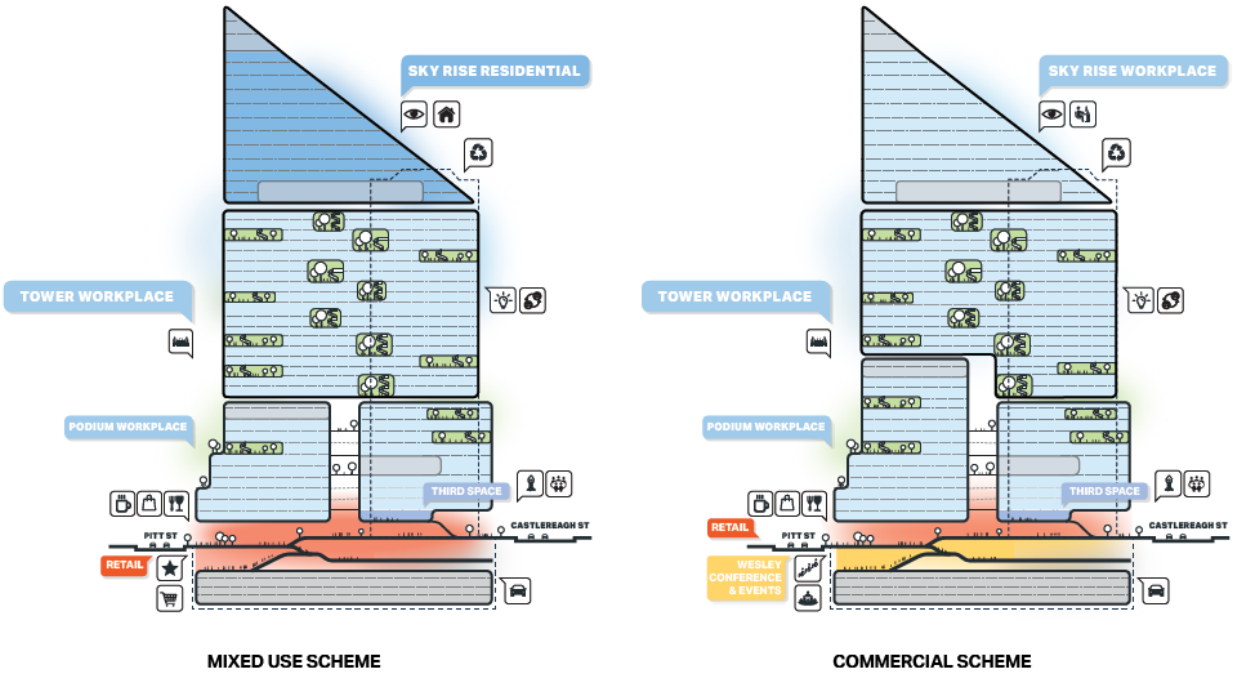
- Provides a commercial office tower (consistent with Scheme #1) for the podium and mid rise tower, includes residential apartments in the sky-rise component of the tower.
- For the purpose of the reference design, this option includes retail use at ground level and lower ground levels replacing Wesley facilities.

Importantly, both schemes:

- Have a consistent maximum GFA.
- Include consistent public domain outcomes including:
  - a through-site link; and
  - retail tenancies which will activate the east-west connection between Pitt Street and Castlereagh Street.

The final detailed design is not limited to the options presented in Concept Schemes 1 or 2 as these represent only possible examples of how development could be realised. Subject to the Planning Proposal being finalised, the proponent will prepare a competition brief in support of a design competition that will support the preparation of a future detailed DA.

Figure 20 Illustration of the two concept reference scheme



Source: 3XN

7.2. BUILDING ENVELOPES

As outlined in this PP, in order to deliver upon the strategic objectives of the CSPS and contribute to the diversity and productivity of Central Sydney, two alternate building envelopes have been prepared by 3XN to provide sufficient floor space on the site.

The proposed envelopes are informed by the:

- unique site constraints given the proposed retention of building structure, lower level structures and basement car parking.
- objective to retain and 'upcycle' the majority of the existing structure of 133 Castlereagh Street tower and basement,
- allowing the potential of maintaining Wesley Mission facilities on site in the commercial scheme,
- design imperatives including improving floor plate depth for commercial uses and achieving appropriate amenity and setbacks for residential uses (where applicable),
- the existing built form controls in the DCP and establishing a contextual response to adjoining sites, and
- extensive consultation with Council.

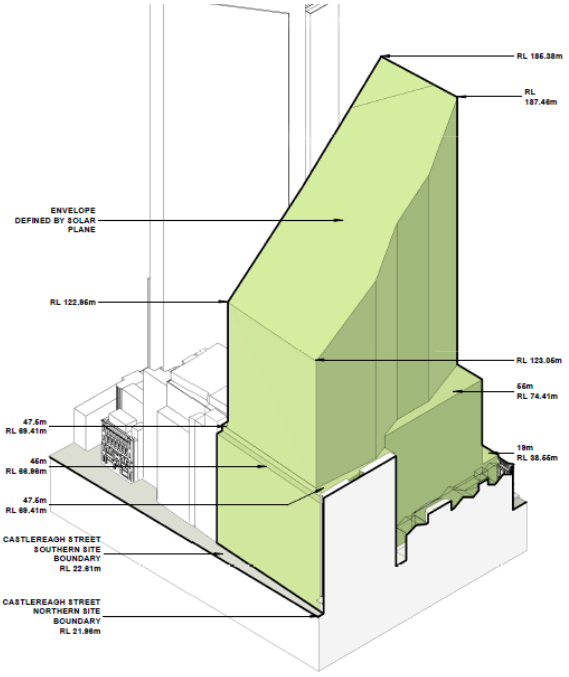
7.2.1. Two Building Envelope Options

Given the flexibility sought in the Planning Proposals for different land use option outcomes, two different building envelope plans have been prepared and included in the draft site specific DCP.

One building envelope plan applies to a commercial building scheme while the other applies in the event that a mixed-use scheme is pursued.

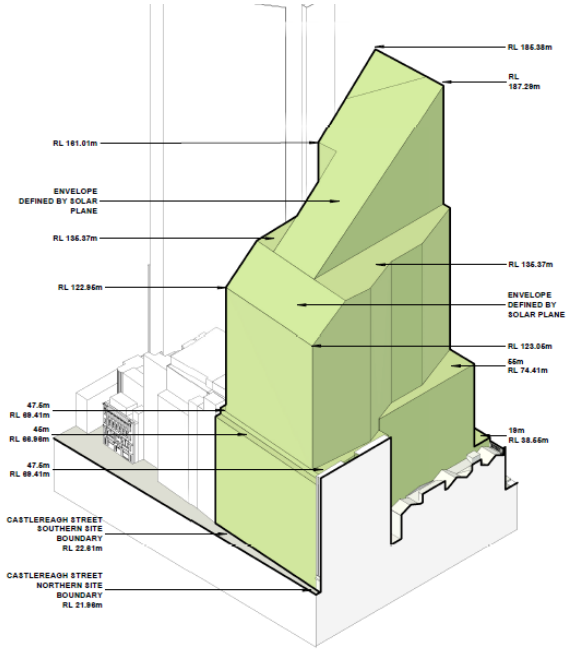
The two envelope plans are illustrated below:

Envelope #1 – Commercial Scheme



NORTHEAST AXONOMETRIC - ENVELOPE

Envelope #2 – Mixed Use Scheme



NORTHEAST AXONOMETRIC - ENVELOPE

The two envelope options have the following consistent elements:

Podium Level

- Consistent street wall heights along Pitt and Castlereagh Streets.
- Location and dimensions of through-site link.

Mid Rise Tower

- Consistent tower setbacks (above podium) from Pitt and Castlereagh Streets.
- Consistent northern and southern setbacks (above podium).

Sky Rise Tower

- Alignment of upper level envelope to sun access plane.
- Overall maximum building height.

The material differences between the two envelopes relate to the sky rise tower element, which has adopted a different form depending on whether the land use is commercial or residential use. The mixed use envelope option includes greater setbacks at the sky rise level from the north and south to address required separations between adjacent buildings which are greater in the case of residential use as per the Apartment Design Guide.

An Urban Design Report accompanies the Planning Proposal at **Appendix A,** which includes a detailed description of the proposed building envelopes.

7.3. BUILDING ENVELOPE #1 – COMMERCIAL OPTION

7.3.1. Envelope Description

The building envelope proposes an irregular shape largely driven by the retention of the existing structure on site and compliance with the Hyde Park SAP. The envelope will provide an overall height of 168.05m (RL 187.46) with a podium height of ~50m (RL69.41) to Castlereagh Street and a stepped podium height of 19m (RL 38.55) – 30m (RL50.43) to Pitt Street. Key elements of the envelope are outlined below.

7.3.2. Podium Level

The podium envelope consists of a ground, lower and upper podium form as illustrated in **Figure 21**.

The podium is designed to predominately align with the site boundaries at ground and lower podium. The envelope is articulated through a substantial minimum clear 6m wide through site link (with a minimum 6m clear line of sight) that dissects the ground level and provides access from Pitt Street to Castlereagh Street. To align with the adjoining heritage item to the north-west (City Tattersalls), an 8m setback is proposed above the street wall height of 19m. This setback is proposed for a length of 16m to create a spacious and legible entry into the through site link.

The 8m tower setback is carried along the full western street frontage of Pitt Street. A 2.5m tower setback along the full eastern frontage of Castlereagh Street above the 45m high upper podium envelopes which is driven by the retention of the existing structure. This creates a continuous 45m Castlereagh Street wall.

Figure 21 Extract of podium envelope plans

Ground Envelope Plan

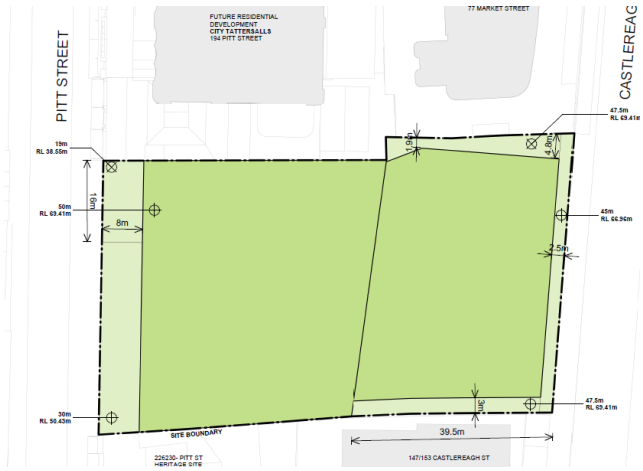
Lower Podium Plan (up to 30m)

5 Upper Podium Plan (30m – 45m)

Source: 3XN

Upper Podium Plan (45m – 50m)

Source: 3XN



Upper Podium (50m - 55m)

The following table clarifies the proposed podium envelope height and setbacks.

Table 10 Building Envelope – Podium Setbacks

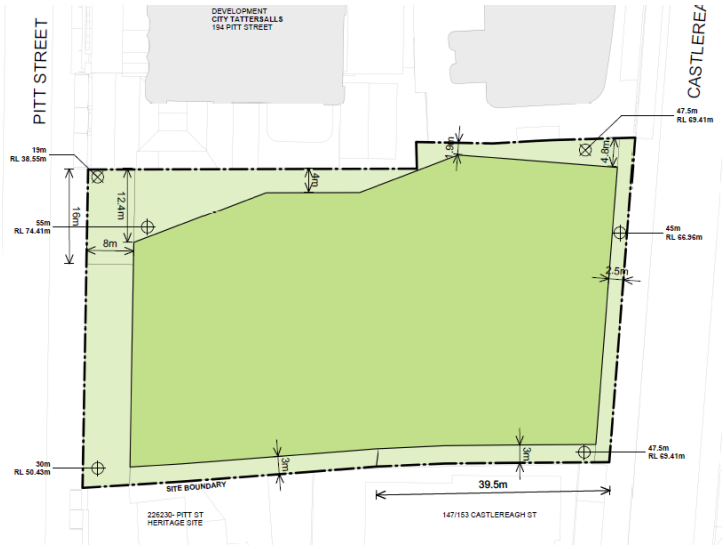
Frontage	Podium	Setback
North (65-77 Market Street – David Jones Building, and 194 Pitt Street – City Tattersalls Club)	Lower podium (0m – 50m) TSL allowance (up to 30m)	0m 16m to the northern boundary to 30m, allowing for the through site link
	Upper podium (from 47.5m)	1.9m to 4.8m (eastern end)
East (Castlereagh Street)	Lower podium (0m – 45m)	0m
	Upper podium (from 45m)	2.5m
South (151 Castlereagh Street and 228 Pitt Street)	Lower podium (0m – 55m)	0m
	Upper podium (from 47.5m)	3m (eastern end)
West (Pitt Street)	Lower podium (from 19m)	0m – 8m (north-west)
	Upper podium (from 30m)	8m

7.3.3. Tower Levels

The tower envelope plan is defined by a splayed setback to the north-west, existing heritage building and the future redevelopment opportunities to the south, retention of the existing structure, and feedback from the Council. In addition, the tower crown responds to the removal of the existing SAP breach as discussed in **Section 5.1.2**.

The tower plan provides a side setback of 3m to the southern boundary. A varying setback ranging between 1.9m, 4m, 4.8m and 12.4m to the northern boundary is proposed. This is informed by the existing structure to the east (1.9m – 4.8m setback) and building separation to the adjoining residential development and an adequate articulation zone of 5.5m for future site redevelopment (4m – 12m).

The tower envelope is defined as a lower tower and upper tower form, illustrated in **Figure 22**.

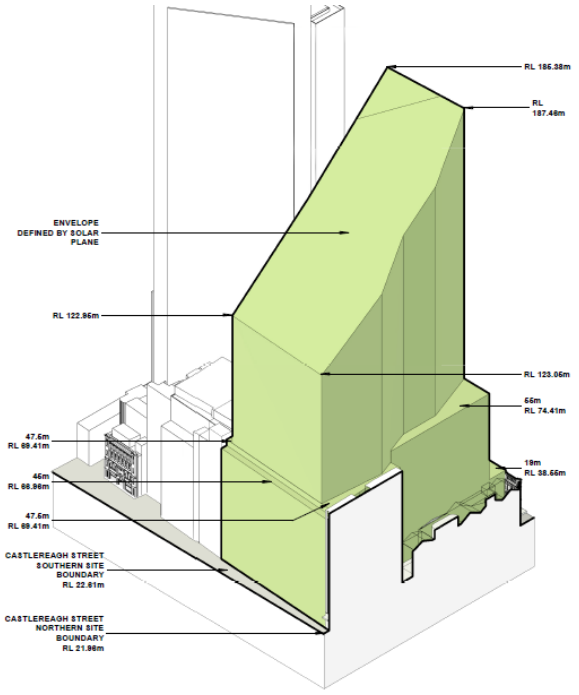


55m-187m, variable top of envelope

7.3.4. Overall Building Envelope for Commercial Scheme

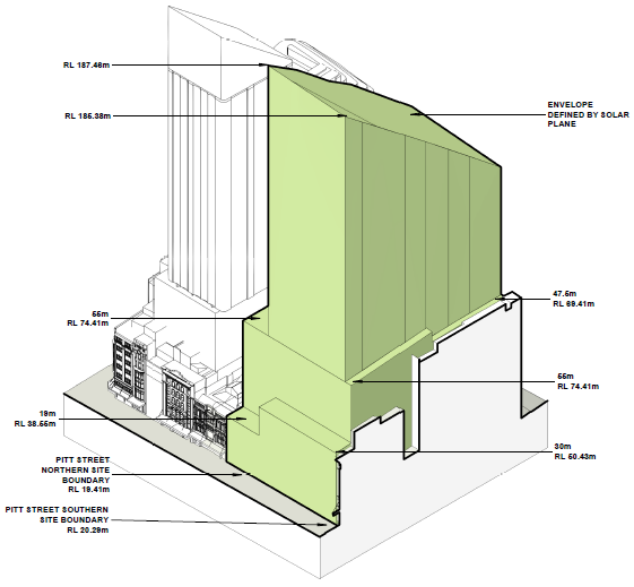
Axonometric views of the proposed building envelope from the north-east (Castlereagh Street frontage) and the south-east (Pitt Street frontage) are provided in **Figure 22** and **Figure 23.**

Figure 22



NORTHEAST AXONOMETRIC - ENVELOPE

Figure 23



SOUTHWEST AXONOMETRIC - ENVELOPE

7.4. BUILDING ENVELOPE #2 – MIXED USE OPTION

7.4.1. Envelope Description

The building envelope proposes an irregular shape largely driven by the retention of the existing structure on site and compliance with the Hyde Park SAP. The envelope will provide an overall height of 167.88m (RL 187.29) with a podium height of ~50m (RL69.41) to Castlereagh Street and a stepped podium height of 19m (RL 38.55) – 30m (RL50.43) to Pitt Street. Key elements of the envelope are outlined below.

7.4.2. Podium Level

The podium envelope consists of a ground, lower and upper podium form as illustrated in **Figure 24**. The podium envelope is consistent with the Commercial Building Envelope described above.

The podium is designed to predominately align with the site boundaries at ground and lower podium. The envelope is articulated through a substantial 6m – 10m wide through site link (with a minimum 6m clear line of sight) that dissects the ground level and provides access from Pitt Street to Castlereagh Street. To align with the adjoining heritage item to the north-west (City Tattersalls), an 8m setback is proposed above the street wall height of 19m. This setback is proposed for a length of 16m to create a spacious and legible entry into the through site link.

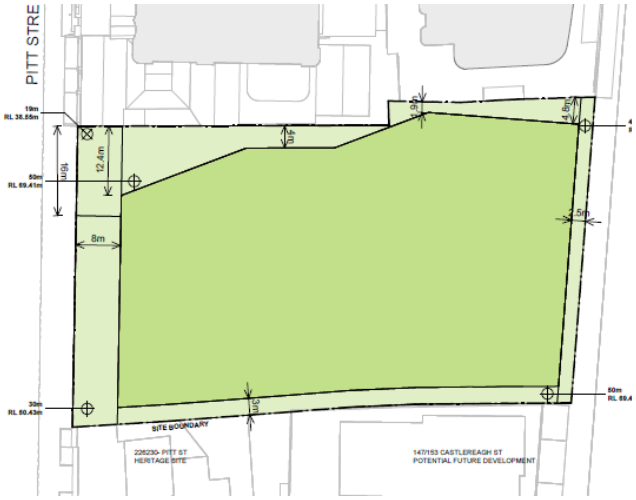
The 8m tower setback is carried along the full western street frontage of Pitt Street. A 2.5m tower setback along the full eastern frontage of Castlereagh Street above the 45m high upper podium envelopes which is driven by the retention of the existing structure. This creates a continuous 45m Castlereagh Street wall.

7.4.3. Mid Rise Tower

The mid-rise tower component of the envelope also remains consistent the Commercial Building Envelope as per the figure below:

The mid-rise tower plan provides a side setback of 3m to the southern boundary. A varying setback ranging between 1.9m, 4m, 4.8m and 12.4m to the northern boundary is proposed. This is informed by the existing structure to the east (1.9m – 4.8m setback) and building separation to the adjoining residential development and an adequate articulation zone of 5.5m for future site redevelopment (4m – 12m).

Figure 24 Extract of tower envelope plan- mid rise



Lower Tower Plan (55m – 116m)

Source: 3XN

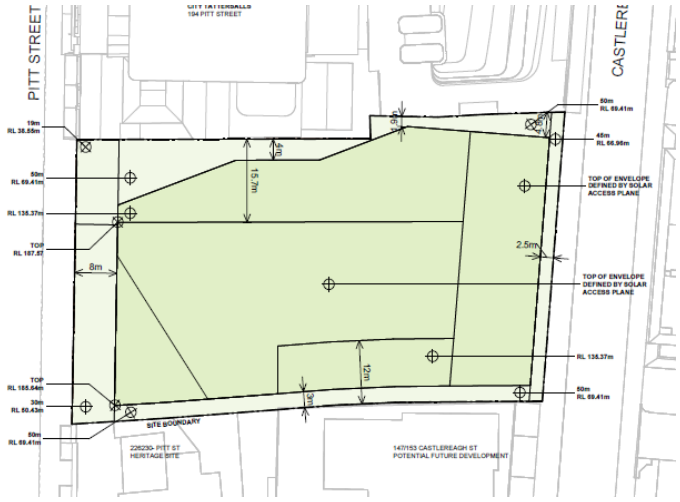
7.4.4. Sky Rise Tower

The upper tower plan is highly articulated from 116m up to the maximum height.

An increased setback of 15.7m is proposed to the north adjoining the City Tattersalls redevelopment to provide adequate separation, amenity, and daylight access. Similarly, an increased 12m separation is proposed to the south should the adjoining site at 147/153 Castlereagh Street be developed into a residential form in the future.

To the east on Castlereagh Street, the building envelope follows the Hyde Park sloped solar access plane from RL122.95m up to RL 187.29m, in a similar manner to the adjoining approved Concept DA and development at 65-7 Market Street, Sydney. The apex of the building crown is along the Pitt Street frontage and ranges between RL 185.38m (south) – RL 186.29m (north) due to the sloped site topography.

Figure 25 Extract of tower envelope plan – high rise



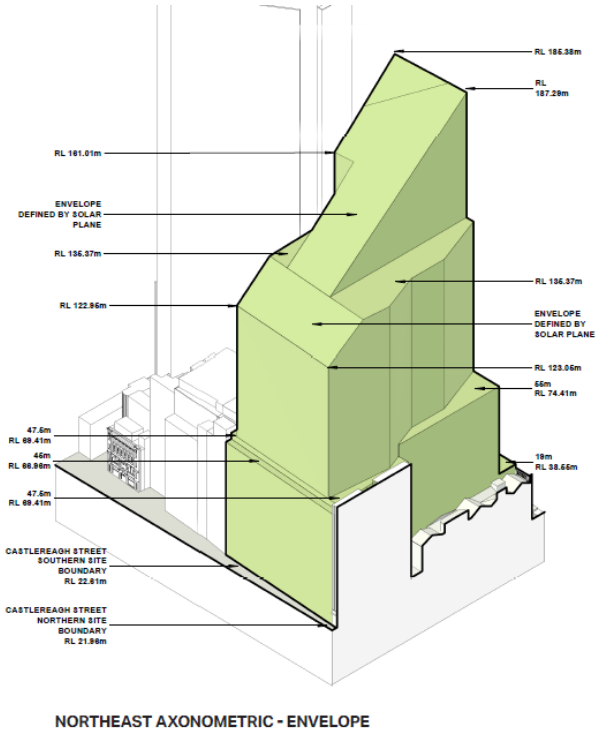
The following table clarifies the proposed tower envelope height and setbacks.

Table 11 Building Envelope – Tower Setbacks

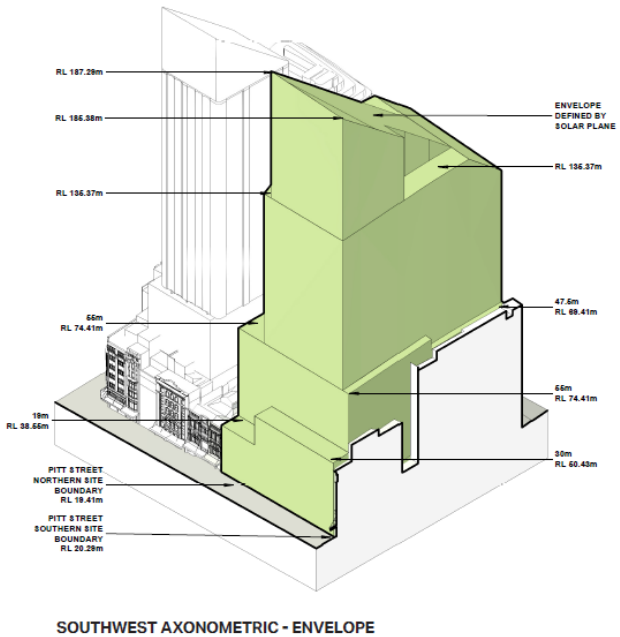
Frontage	Tower	Setback
North (77 Market Street – David Jones Building, and 194 Pitt Street – City Tattersalls Club)	Lower tower (50 – 116m)	1.9m – 12.4m
	Upper tower (from 116m)	1.9m – 15.7m
East (Castlereagh Street)	Lower tower (50 – 116m)	2.5m
	Upper tower (from 116m)	N/A – sloped height
South (151 Castlereagh Street and 228 Pitt Street)	Lower tower (50 – 116m)	3m
	Upper tower (from 116m)	3m- 12m
West (Pitt Street)	Lower tower (55m – 116m)	8m
	Upper tower (from 116m)	8m

7.4.5. Overall Envelope for Mixed Use Scheme

Figure 26 North-east (Castlereagh Street frontage) axonometric building envelope view (below left)



NORTHEAST AXONOMETRIC - ENVELOPE



SOUTHWEST AXONOMETRIC - ENVELOPE

Source: 3XN

Figure 27 South-east (Pitt Street frontage) axonometric building envelope view (above right)

7.4.6. Envelope GFA

The GFA that informs the draft site-specific planning provisions in the Sydney LEP 2012 are determined by:

- The concept reference scheme for above ground floor space;

- Completion of a competitive design process and award of 10% floor space bonus; and
- The existing GFA of the Wesley facilities below ground (whereby this basement is levels have the potential to be used by Wesley or retail/EOT uses). There is detailed design work still required to the loading area and ground floor which may lead to a removal, re-arrangement or reduction of this basement floor space. A conservative approach has been taken by adopting Wesley's existing GFA.

This results in a total GFA of 104,867sqm (99,200sqm above ground and 5,667sqm below ground) and a FSR of 21.85:1.

Table 12 Envelope Key Development Metrics

Metric	Description	Building Envelope GFA	FSR
Floor space distribution	Above ground	99,200sqm	20.67:1
	Below ground	5,667sqm (reflective of existing below ground Wesley Mission facilities)	1.18:1
	Total	**104,867sqm**	**21.85:1**

7.5. CONCEPT REFERENCE SCHEMES

7.5.1. Overview

Consistent with the approach to the building envelope plans, two concept reference schemes accompany the Planning Proposal for the purposes of demonstrating that the proposed building envelope is capable of accommodating a future redevelopment under each scenario. The reference schemes are indicative only and the final detailed design of the scheme will be the subject of a competitive design process and detailed DA.

The project will deliver an adaptive upcycled tower preserving embodied carbon. The public domain will be greatly enhanced through the redevelopment of the Castlereagh frontage, inclusion of a through site link and the removal of the Hyde Park SAP intrusion.

Common attributes to the concept reference schemes are discussed below including retained structure, ground floor through site link, loading and access, ESD and public art and are discussed in turn below.

An Urban Design Report and Concept Reference Scheme Plans accompanies this report at **Appendix A**.

7.5.2. Concept Reference Scheme #1 - Commercial

This concept reference design supports the delivery of a commercial development accommodating:

- Five basement levels, accommodating three levels of car parking (P5 – P3), three levels of loading and servicing (P2 – PS), end of trip facilities (P2) and Wesley facilities (P2 – PS) including amenities, kitchen and meeting rooms.
- Ground level retail tenancies activating the generous east-west pedestrian through site link and street frontages as well as commercial and conference lobbies.
- Wesley office and upper commercial lobby on level 1.
- Commercial floor space from level 2 – level 40 (including within the existing structure) providing approximately 98,244sqm of commercial office space.

The key development metrics for this scheme are summarised in the table below:

Table 13 Reference Scheme Key Development Metrics

Metric	Description	Concept Reference Scheme - commercial
Land use (GFA)	Commercial premises (office premises) - Inclusive of Wesley L1 and L2 commercial office	98,244sqm
	Retail premises	1,368sqm
	Place of public worship (Wesley GF lobby, GF café)	4,554sqm (this is for GF to basement only, as the commercial office areas are captured within the overall office premises above).
	Other (EOT)	701sqm
	Total	**104,867sqm**
Access and parking	Vehicular access	Combined vehicular ingress and egress from Castlereagh Street.
	Car parking and loading	Five levels of basement car parking accommodating 220 car spaces.
	Loading	8 van bays at P1; 6 SRV + 1 van bays at PS
	Pedestrian access	Minimum clear width of 6m connection providing access from Pitt Street through to Castlereagh Street. 24-hour access available.

7.5.2.1. Car Parking – Commercial Scheme

The concept reference scheme will result in the rationalisation of car parking and access to the site from Castlereagh Street and a reduction in the total parking capacity by 50 spaces from approximately 270 spaces to 220 spaces. The proposed allocation of car parking is illustrated in Table 14.

The future parking arrangements for the site seeks to balance the following considerations:

- The existence of the existing public car parking on the site which currently provides for 24/7 car parking spaces on the site, within an existing substantial basement excavation.
- The retention of the existing tower structure, including core, columns and basement, providing a sub optimal base condition.
- The acknowledgement of strategic planning objectives to reduce vehicle movements in Central Sydney over time, by:
  - Reducing the total parking provision of circa 18% compared to that currently existing; and
  - Removing the existing casual parking arrangements in place currently as a public car parking facility.
- The ability for some flexibility in the management of this car parking to address ground lease obligations with the Uniting Church as an on-going user. In practice, this means that while the full capacity of the commercial car park spaces (147 spaces) would be required for the Uniting Church on Sundays, Easter

and Christmas, at other times of the week (specifically Monday to Saturday), the intention is the car park (excluding the 35 permanent spaces exclusively allocated for the Church) is available for the use of commercial tenants of the building.

- It is proposed that this would be established on a “reserved basis” from Monday to Saturday forming a “managed car parking” use, as opposed to a public car parking operation that supports casual parking use.

Table 14 Proposed car parking

Land use	**Monday – Saturday allocation (spaces)**	**Sunday allocation (spaces)**
Retail / commercial	185	nil
Wesley	35	220
TOTAL	220	220

* inclusive of the 35 exclusive use by under the ground lease agreement

It is noted that:

- In this reference scheme, the proposal will retain parking for use by the Wesley Mission for their Sunday services, noting this is reduced from the current provision. Office, retail building tenants to use spaces on Monday - Saturday. The PP does have the flexibility for Wesley to vacate and retail/commercial to replace the area.
- Public car park is removed and prohibited
- A car park management plan will be prepared prior to occupation

This is further addressed in **Section 8.2.6** of this report.

7.5.2.2. Loading and Vehicular Access

The vehicular access points will be consolidated into a single access point aligned to the southern site boundary at Castlereagh Street. The southern ramp to serve as a single-lane, bi-directional, access controlled ramp for all vehicle access. An integrated off-street waiting bay is proposed at the entrance on Castlereagh Street. A provision to this effect is proposed within the site specific DCP accompanying the PP submission**.**

The removal of the northern perpendicular ramp allows for a continuous footpath and improved public domain.

Loading will be accessed from Castlereagh Street and occur at ground level, Level S and Level P1. It will be managed via a car park management plan to ensure mitigation of any conflicts and restrict on street queuing. The indicative reference scheme presents a number of van spaces as well as SRVs.

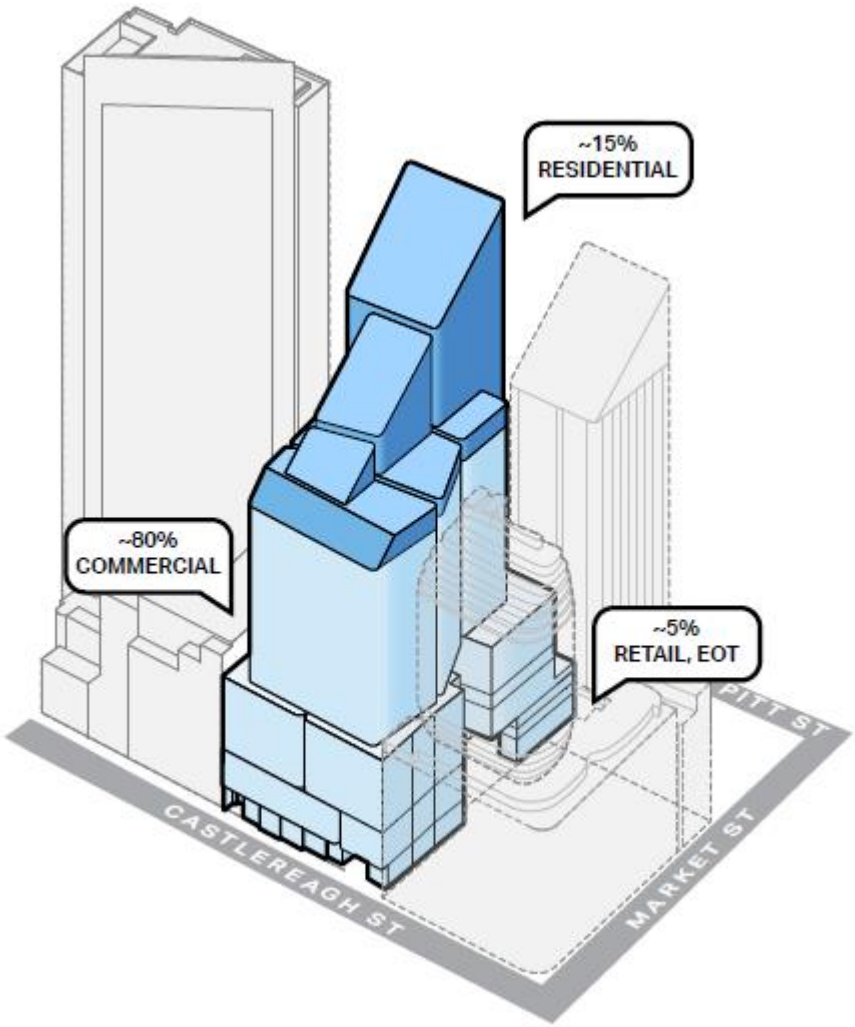
7.5.3. Concept Reference Scheme #2 – Mixed Use

The mixed-use concept reference design supports the delivery of a mixed-use development accommodating:

- Five basement levels, accommodating three levels of car parking (P5 – P3), three levels of loading and servicing (P2 – PS), end of trip facilities (P2) and retail (P2 – PS).
- Ground level retail tenancies activating the generous east-west pedestrian through site link, loading dock and turntable, and the residential lobby off Pitt and commercial lobbies off both frontages.
- Commercial floor space from level 2 – level 28 (including within the existing structure) providing approximately 83,458sqm of commercial office space.
- Residential dwellings and amenity from level 29 – 42 accommodating approximately 96 dwellings.

The distribution of land use within the reference scheme is outlined in **Figure 28.**

Figure 28 Approximate Land use distribution



Source: 3XN

The key development metrics for this scheme are summarised in the table below:

Table 15 Reference Scheme Key Development Metrics

Metric	Description	Concept Reference Scheme – mixed use
Land use (GFA)	Commercial premises (office premises)	83,493sqm (79.6% of total floor space)
	Residential accommodation	15,882sqm (15.14% of total floor space)
	Retail premises	4,719sqm (4.5% of total floor space)
	Other (EOT)	773sqm (1% of total floor space)
	Total	**104,867sqm**

Metric	Description	Concept Reference Scheme – mixed use
Access and parking	Vehicular access	Combined vehicular ingress and egress from Castlereagh Street.
	Car parking and loading	Five levels of basement car parking accommodating 185 car spaces as follows: ▪ 75 residential spaces ▪ 110 commercial/retail
	Loading	11 van bays, 6 SRV bays and 1 MRV loading bay
	Pedestrian access	Minimum clear width of 6m connection providing access from Pitt Street through to Castlereagh Street. 24-hour access available.
Residential Yield	1-bedroom	15 dwellings (15.6%)
	2-bedroom	38 dwellings (39.6%)
	3-bedroom	43 dwellings (44.8%)
	Total	**96 dwellings**

7.5.3.1. Car Parking – Mixed Use Scheme

The concept reference scheme will result in the rationalisation of car parking and access to the site from Castlereagh Street and a reduction in the total parking capacity by 50 spaces from approximately 270 spaces to 185 spaces. The proposed allocation of car parking is illustrated in **Table 16.**

The future parking arrangements for the site seeks to balance the following considerations:

- The existence of the existing public car parking on the site which currently provides for 24/7 car parking spaces on the site, within an existing substantial basement excavation.
- The retention of the existing tower structure, including columns and basement, providing a sub optimal base condition.
- The acknowledgement of strategic planning objectives to reduce vehicle movements in Central Sydney over time, by:
  - Reducing the total parking provision of circa 31% compared to that currently existing; and
  - Removing the existing casual parking arrangements in place currently as a public car parking facility.

Table 16 Proposed car parking

Land use	Monday – Sunday allocation (spaces)
Residential	75
Retail / commercial	110
TOTAL	185

It is noted that:

- Public car park is removed and prohibited
- A car park management plan will be prepared prior to occupation

This is further addressed in **Section 8.3.7** of this report.

7.5.3.2. Loading and Vehicular Access

The vehicular access points will be consolidated into a single access point aligned to the southern site boundary at Castlereagh Street. The southern ramp to serve as a single-lane, bi-directional, access controlled ramp for all vehicle access. An integrated off-street waiting bay is proposed at the entrance on Castlereagh Street. A provision to this effect is proposed within the site specific DCP at **Appendix D.**

The removal of the northern perpendicular ramp allows for a continuous footpath and improved public domain.

Loading will be accessed from Castlereagh Street and occur at ground level, Level S and Level P1. It will be managed via a car park management plan to ensure mitigation of any conflicts and restrict on street queuing. Given the residential use, it has been advised through pre-lodgement engagement that a Council MRV is required to service the development. The indicative reference scheme presents one potential option recognising that additional design development is required to create a more efficient and workable basement which may have implications on the below ground GFA.

7.5.4. Common Elements to both Concept Reference Schemes

7.5.4.1. Ground Floor Through-Site Link

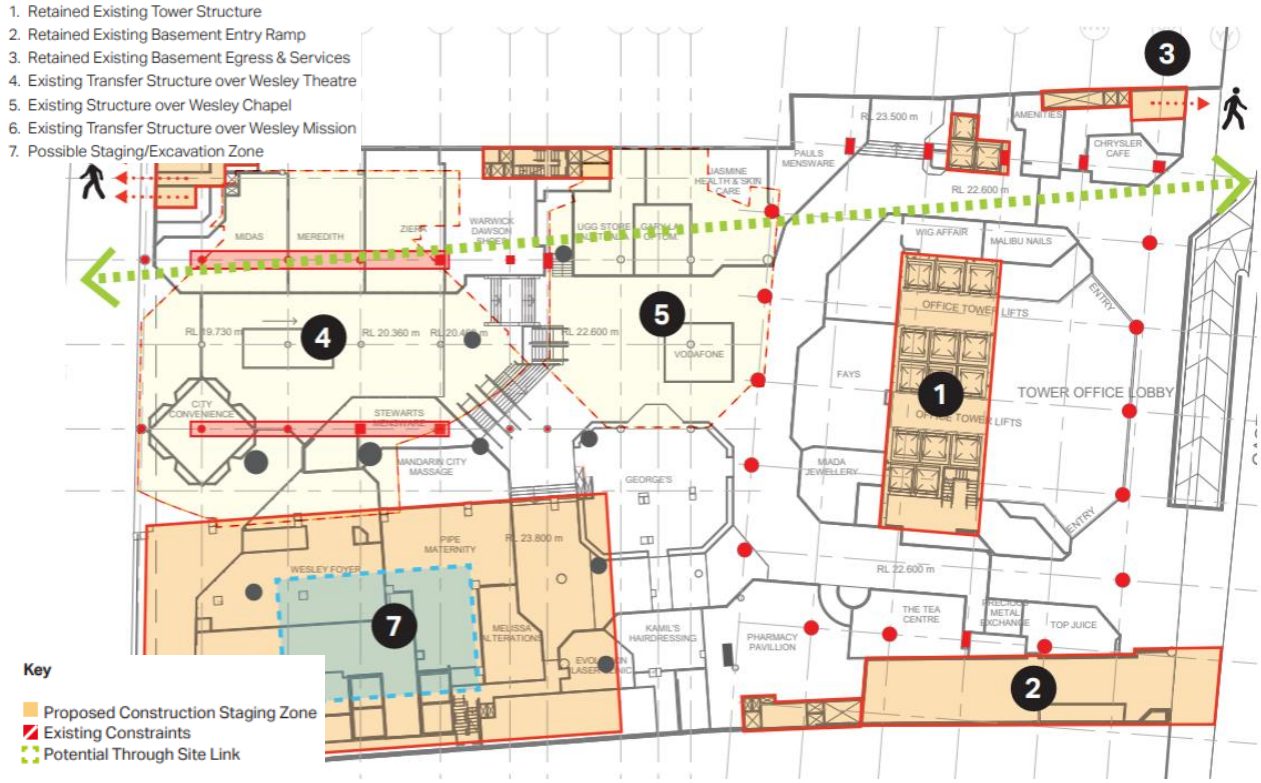
Both reference schemes include a through site link between Castlereagh Street (to the east) and Pitt Street (to the west). This through site link is to be activated where possible and will be open and accessible to the public 24/7. Daylight access to the through site link is to be facilitated by an internal forecourt generally aligned to the north of the ground floor. A photomontage of the link from Pitt Street, an applicable Section Plan and Floor Plan is provided at **Figure 31** and **Figure 32.**

Key elements that informed the arrangement and placement of the through site link are:

- The retention of the 133 Castlereagh commercial tower structure and associated columns
- Retention of the basement and the upper ground floor slab and including potential retention of the Wesley facilities below ground
- Figures below demonstrate the placement of through site link when considering the structural complexity.

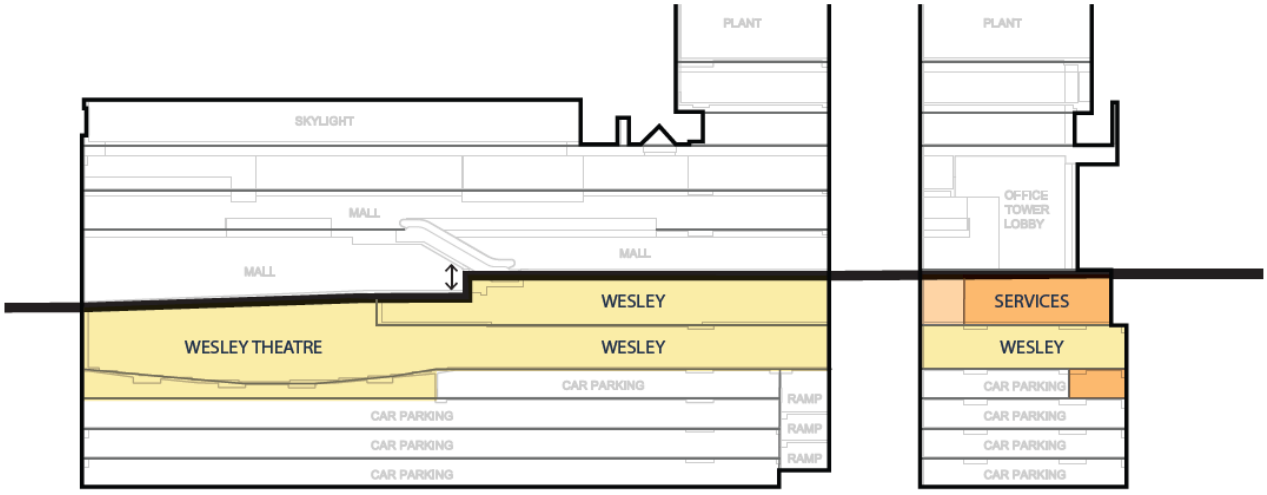
Guidance on the development of the through site link is provided in the proposed site specific DCP (refer **Appendix D**). Specifically, the site specific DCP provisions seek to establish a minimum width and height of the through site link to ensure that the pedestrian link can accommodate activation and an appropriate pedestrian pathway.

Figure 29 Through site link constraint summary



Source: 3XN

Figure 30 Through site link levels informed by retaining the basement and upper ground slab (existing conditions)

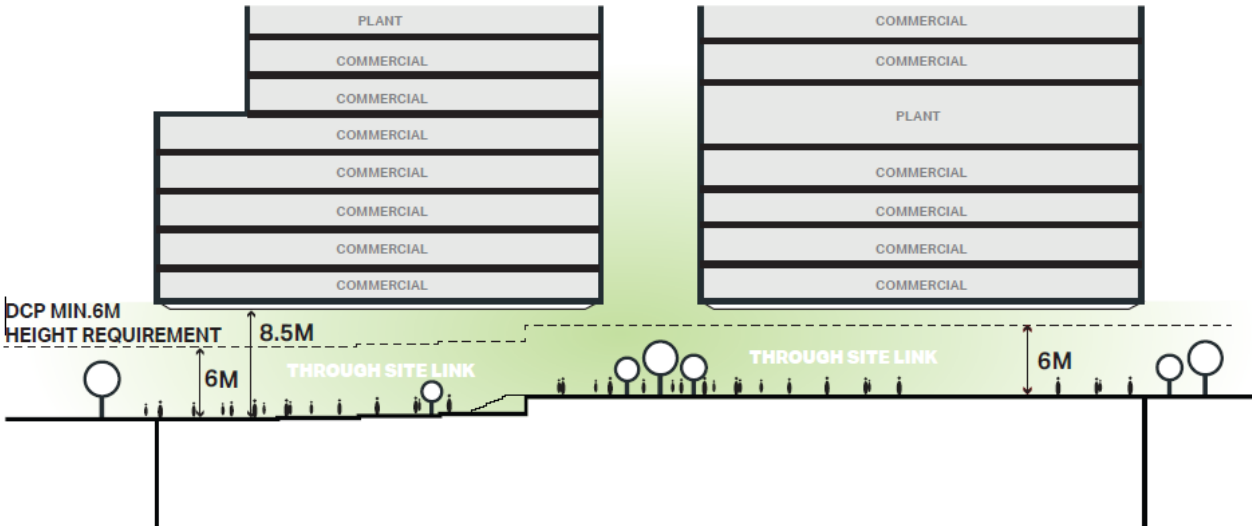


Source: 3XN

Figure 31 Photomontage of entry into the through site link from Pitt Street

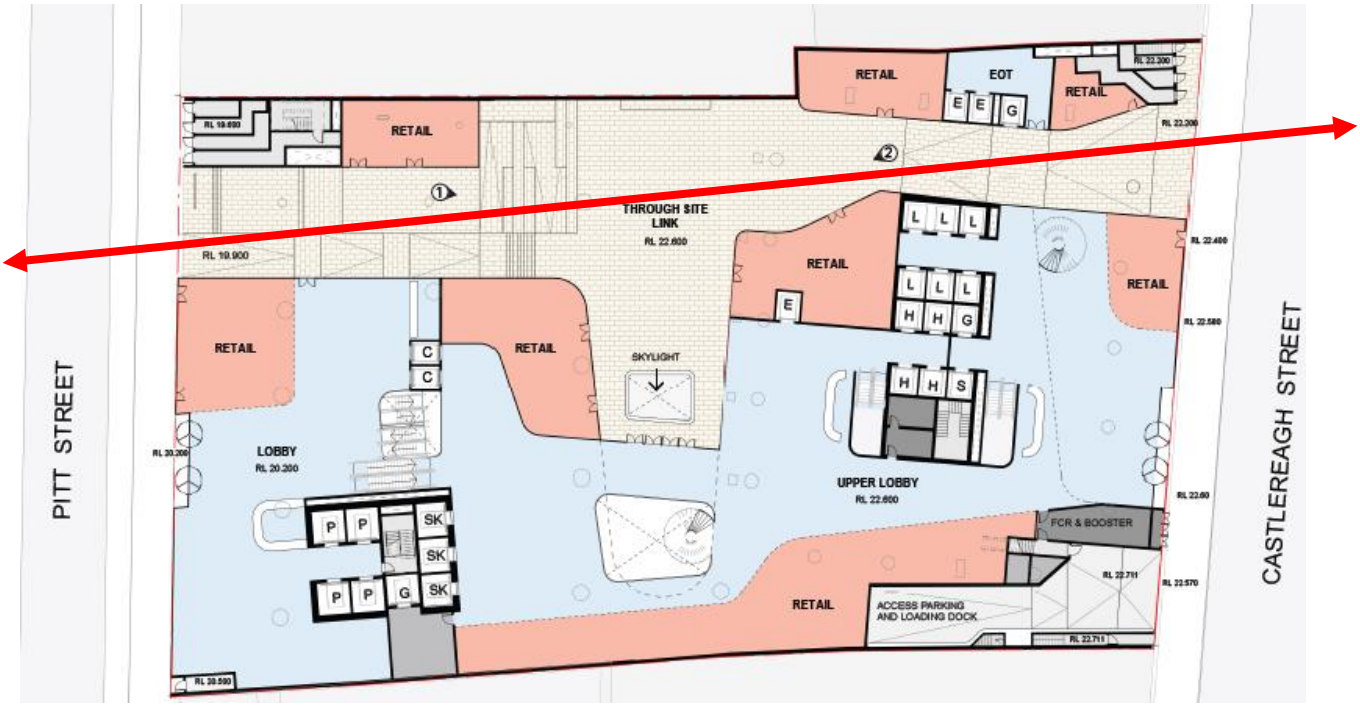
Source: 3XN

Figure 32 Through site link – section plan and ground floor plans



Section Plan, above

Ground Floor Plan of through site link (Above: Mixed use concept; Below: Commercial concept)

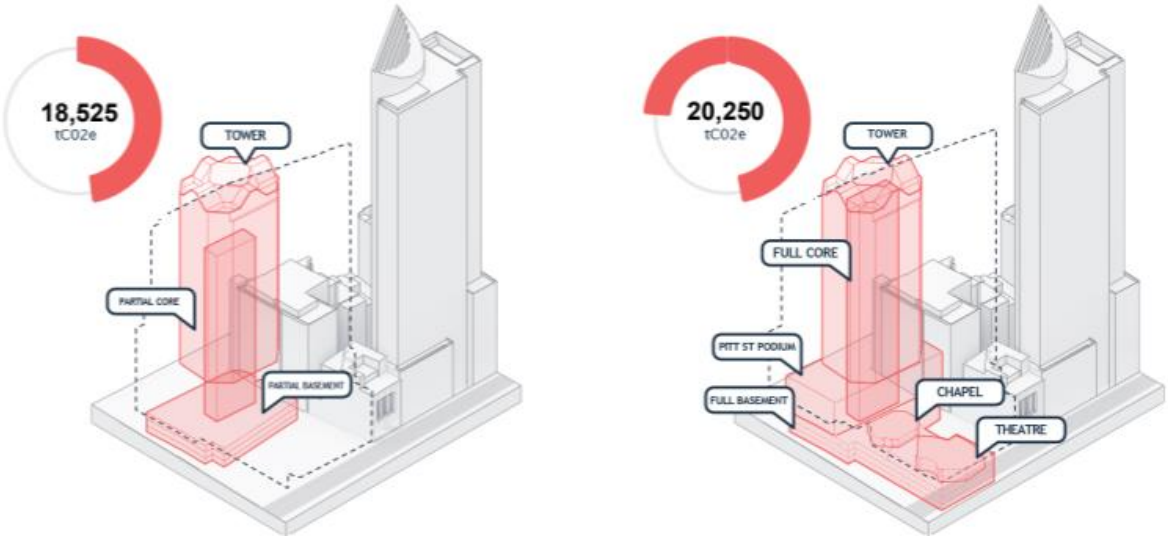


7.5.4.2. Retained Structure / ESD

The development comprises the demolition of 222 Pitt Street building, retention and additions on 133 Castlereagh Street building and a new building on the Pitt Street side. Wesley facilities are largely kept in situ which in turn dictate the ground floor datum. The figure below shows the retained structure as well as the proposed construction methodology utilising raking columns on the Pitt Street frontage.

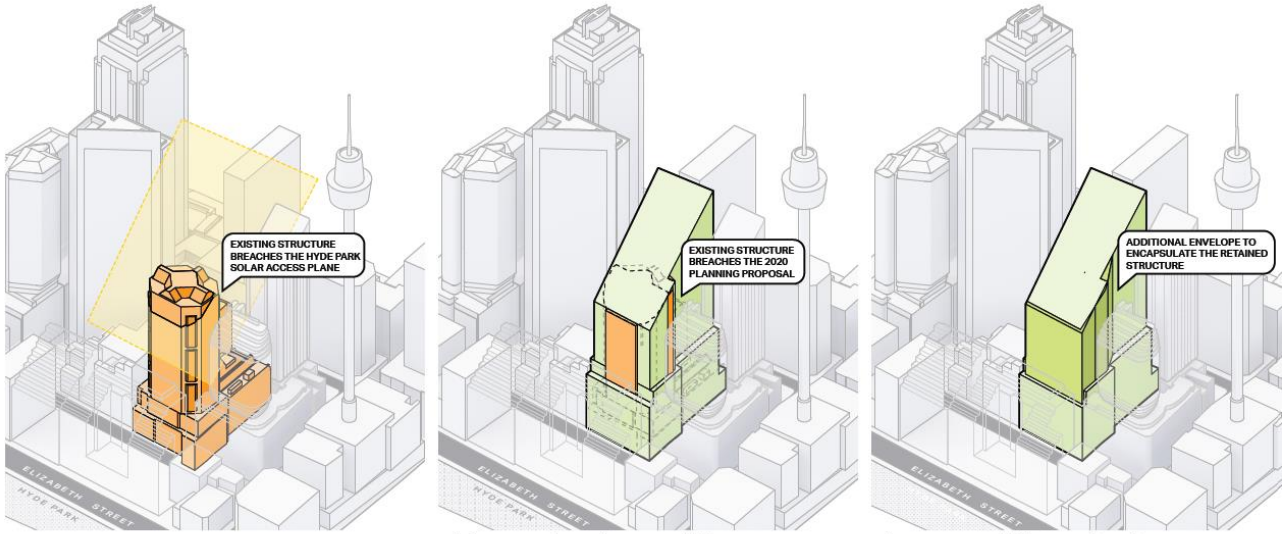
Piccadilly's upcycling proposition considers its whole of life carbon which will be significant in Sydney and a point of difference. The potential redevelopment will retain the majority of its structure making it an innovative and exemplar project. The potential embodied carbon retained on site is demonstrated in **Figure 33.**

Figure 33 Estimated Embodied carbon



Source: 3XN

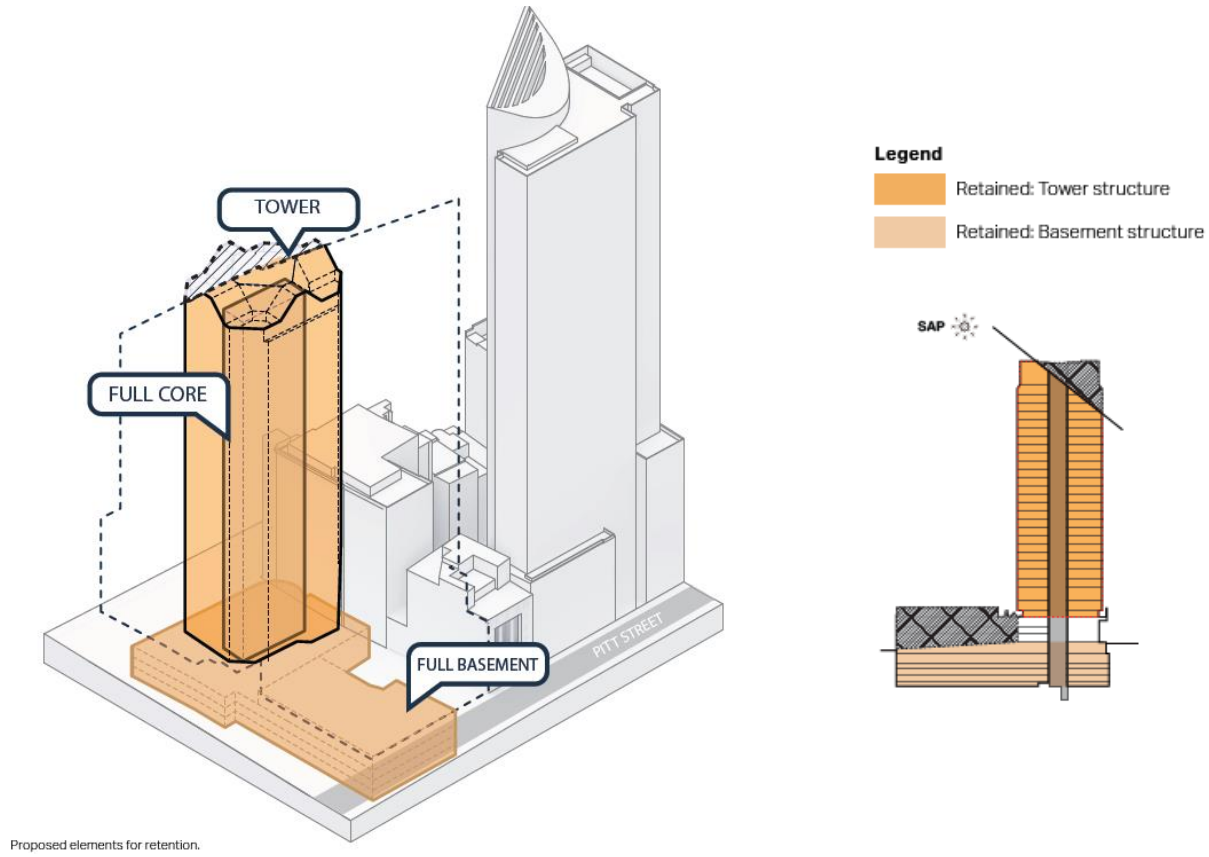
Figure 34 Retained structure and construction



Breach of Hyde Park SAP to be removed.

Existing structure sits outside of the PP2020 envelope.

Adjustment to the PP2020 envelope is required to encapsulate the existing structure and to allow for a new facade zone.



Source: 3XN

7.5.4.3. ESD

The future development of the site will seek to achieve the following benchmark sustainability standards:

- NABERS Energy 5.5 star
- Net Zero Carbon
- NABERS Water 4.5 star
- 6 Star Green Star Buildings v1 rating
- Residential development will comply with required BASIX targets as per the Sustainable Buildings SEPP.

Further, as outlined in this report the upcycling of the existing structure will achieve best practice for sustainability and will be a new landmark for sustainable, mixed-use development in Central Sydney.

This is discussed further in the Sustainable Design Strategy Reports prepared by ARUP that accompanies the Planning Proposal.

7.5.4.4. Public Art

A preliminary public art strategy accompanies the Planning Proposal which provides initial concepts for the implementation of public art within the site which will be finalised at the detailed DA stage. The strategy identifies possible narratives and opportunities for the implementation of public art in the site specifically within the future lobby space, and the future east-west through site link.

7.6. PUBLIC BENEFITS

A Statement of Intent – Public Benefits accompanies the Planning Proposal at **Appendix F.** Stockland is committed to delivering an exemplary development in terms of architectural design, environmentally sustainable design and a greatly enhanced urban experience for the community in terms of street activation, through-site access, mixed-use floor space and the pedestrian experience.

As part of the delivery of the project, Stockland has set out specific tangible public benefits in addition to monetary contributions in force at the time of DA consent. These benefits can be secured through a number of mechanisms including the amended LEP and DCP as well conditions of future development consents.

8. ENVIRONMENTAL IMPACT ASSESSMENT

8.1. EXPLANATION AND OVERVIEW OF THE ENVIRONMENTAL ASSESSMENT

The following environmental assessment is structured as follows:

- Commercial scheme (Section 8.2)
- Mixed use scheme (Section 8.3)
- Other relevant matters for both Commercial and Mixed Use Schemes (Section 8.4)

An urban design report and concept reference schemes prepared by 3XN accompanies this PP at **Appendix A**. The report provides a comprehensive site analysis including review of the existing and future constraints and opportunities presented by the site to inform the building envelopes sought via this PP and the concept reference schemes. The outcome of these investigations created indicative designs that reflects existing site characteristics and optimises site opportunities, enabling the provision of additional floor space density without compromising the amenity of surrounding landholders. The following section provides a built form and urban design assessment of the building envelope sought via this PP.

8.2. COMMERCIAL SCHEME

8.2.1. Building Podium Height and Tower Setbacks

The proposed envelope has been devised with consideration of the objectives and controls in the planning policies as well as an appropriate urban contextual response.

The site is mid-block and in a high-density mixed-use environment, whereby compatibility and integration of the proposed envelope in this context is a key consideration. Not only is the existing built form relationship viewed as important, but the future character, including podium and tower setbacks. Three sites located within the same street block as the site have recently been the subject of major redevelopment applications. This future context is important to draw reference to, particularly the adjoining developments to the north of City Tattersalls Club (194 Pitt Street) and David Jones Building (65-77 Market Street).

Therefore, having regard to the established and approved future urban context, the building envelope podium and tower setbacks sought via the site specific DCP include some variations to seek to vary the built form controls provided in the Sydney DCP 2012.

Podium

The podium heights have been established to align with the predominant or prevailing podium height of the adjoining developments. This creates a consistent streetscape character, and also achieves a comfortable street environment for pedestrians with adequate daylight, scale, sense of enclosure and wind mitigation. This design response results in lower podium heights to Pitt Street reflecting the lower prevailing street wall height, while on Castlereagh Street the established street wall heights are higher.

The podium height along Castlereagh Street is 45m, aligning with the established street wall in the streetscape 38-50m) (of as illustrated in Figure 35)**.** The creation of a lower and upper podium on Pitt Street reflects the character of the street. A stepped podium height is proposed along Pitt Street, as illustrated in Figure 35)**,** aligning with the immediately adjacent heritage items to the north and south. The lower podium also incorporates a 16m side setback from the north to facilitate the east-west through site link. An upper podium on Pitt Street, retaining the 8m setback from the street, is set at 55m to reflect a prevailing podium height in the streetscape that ranges from ~50-55m.

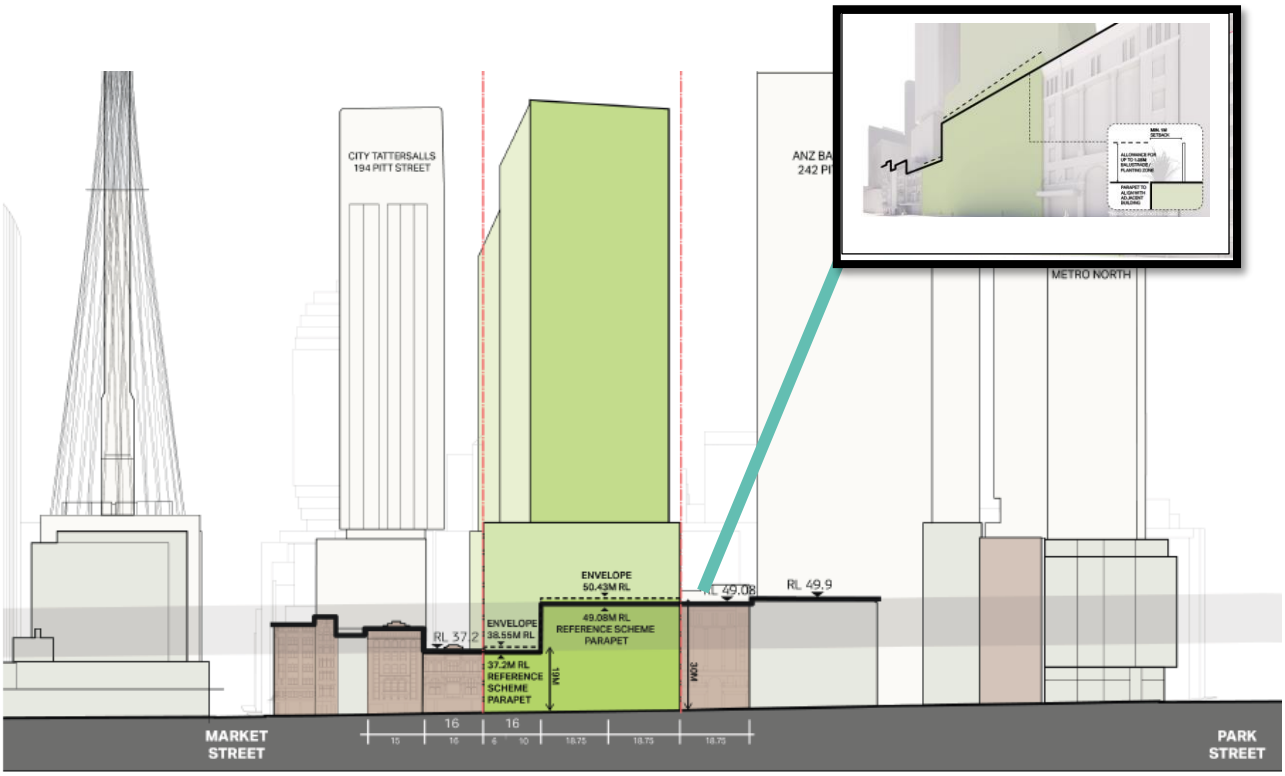
The Sydney DCP 2012 requires a street frontage height of 20-35m greater than 55m and up to 120m, and 20-25m for buildings greater than 120m. The envelope is therefore non-compliant with these provisions.

In order to vary these controls, detailed assessment has been undertaken in accordance with the procedure specified in Schedule 12 of the DCP Amendment. Specifically, Procedure B requires a comparison of base case building massing to the proposed non-compliant building envelope sought via this PP. Where equivalent or improved wind safety and daylight levels (determined by average SVF in adjacent public places is demonstrated, variations may be permitted.

As per Schedule 12 (B) of the Sydney DCP 2012, this non-compliance is justified as:

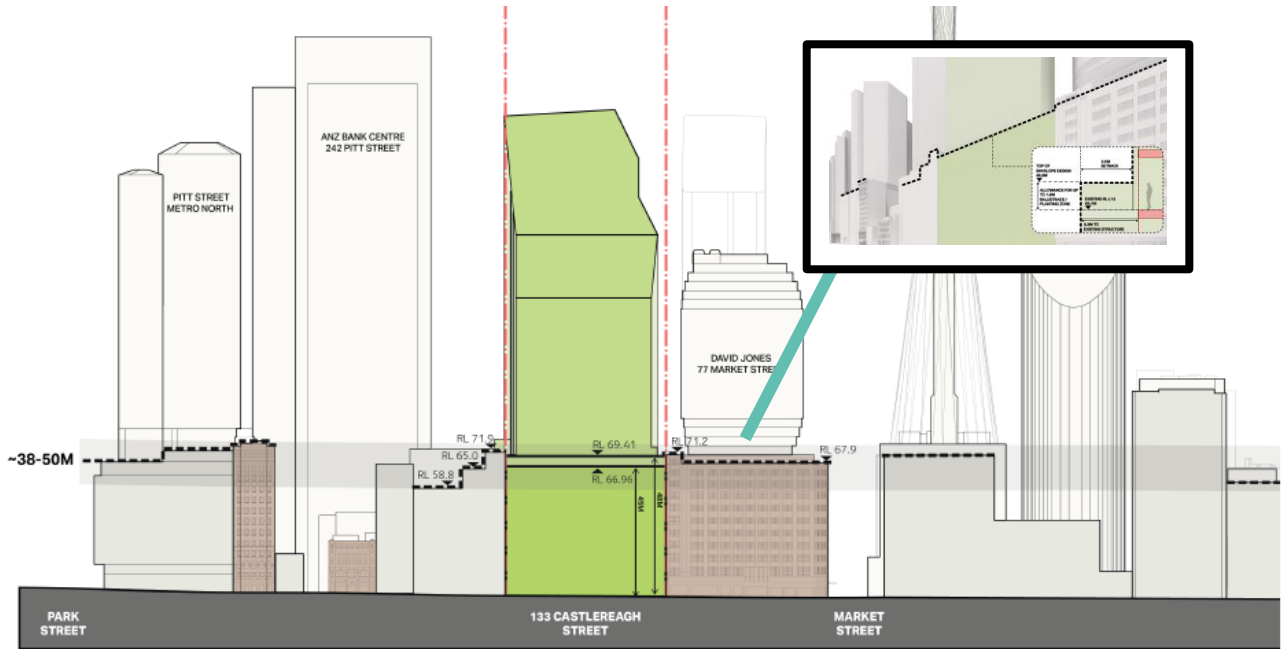
- A summary of the outcomes of the SVF assessment and wind impact assessment undertaken to justify the variations to the built form controls is detailed in Section 8.2.4. and 8.2.5 and the accompanying SVP and wind reports. These assessments confirm that an equivalent outcome is achieved with regards to varying minimum street setbacks and side and rear setbacks, building form separations and tapering provisions.
- A high-quality urban design outcome will be achieved. This is discussed at **Appendix A**, and summarised in **Figure 36** and **Figure 37.**

Figure 35 Prevailing podium heights – Pitt St and Castlereagh St



Picture 6 Pitt Street elevation and 3D massing in image subset

Source: 3XN



Castlereagh Street elevation and 3D massing in image subset

Source: 3XN

Tower

Consistent with the approach to the podium, the proposed tower setbacks are responsive to context, removal of SAP breach and the retention of the existing structure. On significant frontages such as Pitt Street where the built form will achieve its highest point, a compliant 8 metre front setback is provided. On Castlereagh Street, where the existing structure is retained, tower setbacks are varied and the built form is lower due to the sun access plane, the standard tower setback is unable to be achieved.

The tower setbacks result in variable side setback requirements which is reflective of the distinctive sloped building height plane and as such also results in partial non compliances against the DCP.

The Sydney DCP 2012 requires minimum street setbacks of 8m and a side and rear setback of 4m for buildings greater than 55m up to 120m, and 3.33% of the proposed total height of building for development greater than 120m up to 240m.

The envelope is therefore non-compliant with these provisions.

In order to vary these controls, detailed assessment has been undertaken in accordance with the procedure specified in Schedule 12 of the DCP Amendment. Specifically, Procedure B requires a comparison of base case building massing to the proposed non-compliant building envelope sought via this Planning Proposal. Where equivalent or improved wind safety and daylight levels (determined by average SVF in adjacent public places is demonstrated, variations may be permitted.

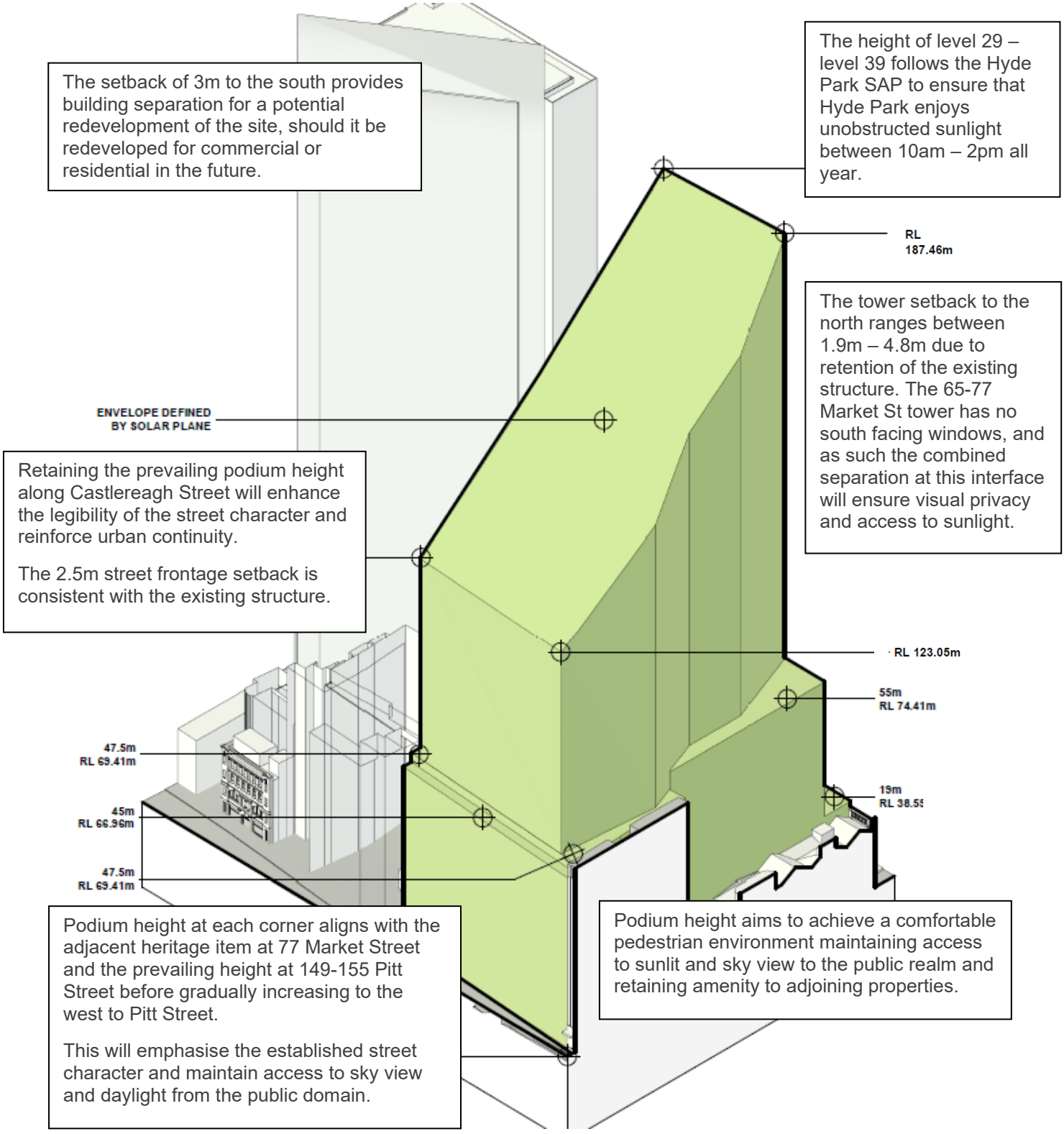
As per Schedule 12 (B) of the Sydney DCP 2012, this non-compliance is justified as:

- equivalent or improved wind comfort, wind safety and daylight levels in adjacent Public Places relative to a base case building massing is achieved. A summary of the outcomes of the SVF assessment and wind impact assessment undertaken to justify the variations to the built form controls is detailed in Section 8.2.4 and Section 8.2.5 and the accompanying SVF and wind reports. These assessments confirm that an equivalent outcome is achieved with regards to varying minimum street setbacks and side and rear setbacks, building form separations and tapering provisions.
- A high-quality urban design outcome will be achieved. This is discussed below, at **Appendix A**, and summarised in **Figure 36** and **Figure 37.**
- In summary, the tower setbacks to the side boundaries are appropriate having regard to the side separation to the proposed residential developments to the north, including:

- Respecting the future City Tattersalls Club residential interface on the north western end, through a combined 23m building separation between the towers. The pulling back of the NW corner provides greater building separation from the northern development and greater visual privacy to their south facing apartments, which do not achieve minimum ADG setbacks.
- At the NE corner, the envelope is cut back (by 1.9m to 4.8m from the northern boundary) to follow the geometry of the existing floor plate. This allows for a building separation of 7.9m to 10.8 between 77 Market Street. Whilst the southern apartments at 77 Market St only have outlooks east or west, this reduction in massing helps reduce any impacts to the periphery of their views and allows for adequate daylight and outlook to both developments

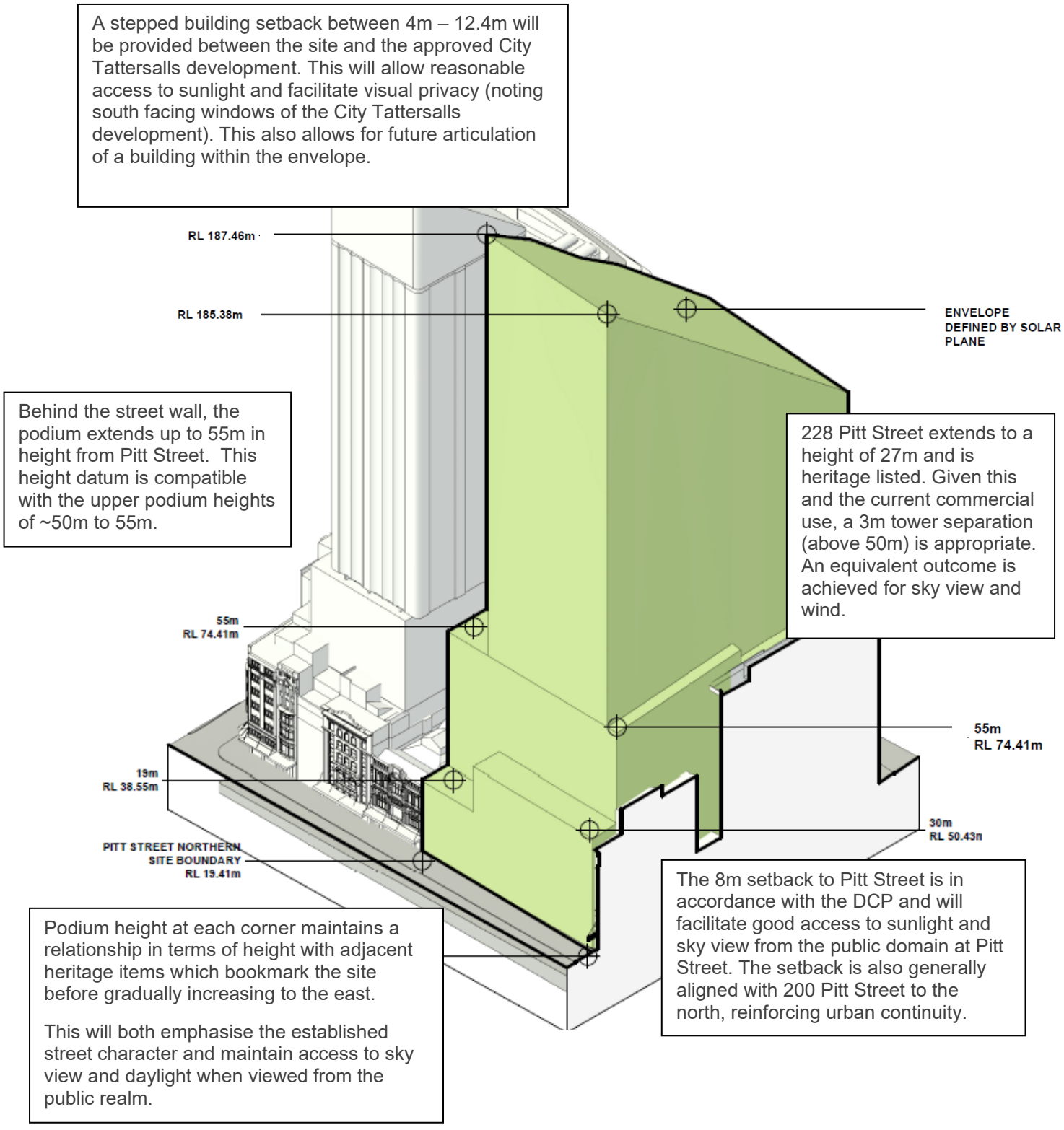
- The southern side tower setback is setback 3m and is appropriate when considering:
  - The development potential of 228 Pitt Street, being a heritage item and therefore being constrained by heritage considerations as well as the site area limiting the future building height.
  - 149-155 Castlereagh Street is currently a commercial development and given the strong incentivisation of employment floor space under the Central Sydney Planning Strategy, it is likely that this future development would continue to be commercial in nature. Notwithstanding this, a potential future residential development on the adjacent site would result in appropriate building separation.
  - The tower setbacks ensure there is appropriate consideration of amenity in terms of daylight, outlook, view sharing, ventilation, wind mitigation and privacy for nearby residential buildings.

Figure 36 Built form envelope response – Castlereagh Street



Source: 3XN, Urbis

Figure 37 Built form envelope response – Pitt Street



Source: 3XN, Urbis

8.2.2. Overshadowing

The eastern portion of the top of the existing building on the site breaches the Hyde Park SAP provisions. The building envelope proposed through this Planning Proposal is consistent with the Hyde Park SAP resulting in no overshadowing of Hyde Park as demonstrated in the shadow diagrams in the Urban Design report prepared by 3XN. The extract below shows the additional solar access afforded to Hyde Park, due to the removal of the SAP breech.

Figure 38 2pm Shadow Diagram (Winter Solstice)

8.2.3. Visual Impacts

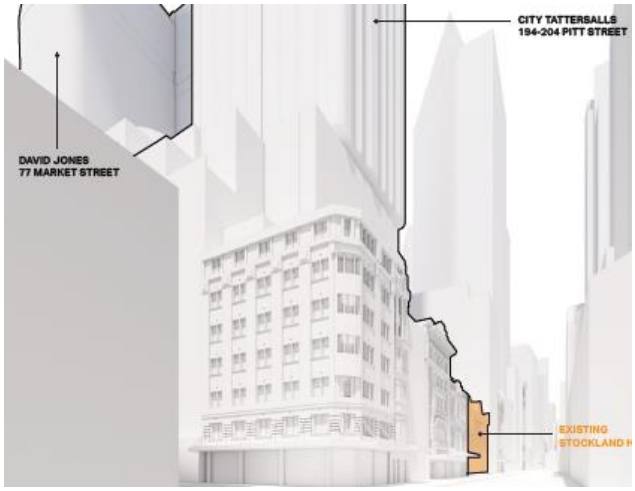
To determine the visual impact assessment of the commercial reference scheme compared to the existing Piccadilly Complex 3XN have prepared a series of building massing diagrams scheme from key vantage points in the public domain (refer **Figure 39** and **Figure 40**).

The visual impacts of the built form are most noticeable from Pitt Street noting that the existing Piccadilly tower is located toward the east of the site at Castlereagh Street and the built form at this streetscape will be somewhat unchanged. As noted throughout this report, the building envelope is appropriately setback at this frontage to allow access to sky view and daylight at the public domain. The removal of the sky bridges will result in an improved outcome from the public domain.

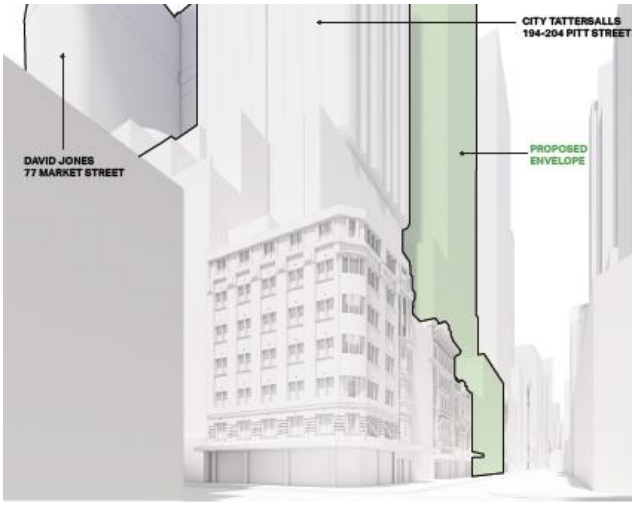
In addition, it is noted that the future surrounding development at City Tattersalls Club (194 Pitt Street) and the David Jones Building (65-77 Market Street) will conceal views of the building from the public domain at Pitt Street the corner of Pitt and Market Street.

The vantage point from Hyde Park presented in **Figure 40** demonstrates that the envelope will result in a built form outcome which is in keeping with the CBD context in which it is located. As a result of the Hyde Park Sun Access Plane, the future building is purposefully visible from the public domain noting that it will be assured of achieving design excellence through a competitive design process.

Figure 39 Building massing diagrams from key vantage points



Existing view from Pitt Street looking south



Proposed view from Pitt Street looking south

Figure 40 Building massing diagrams from key vantage points

Existing view from Hyde Park looking west

Source: 3XN

Proposed view from Hyde Park looking west

Source: 3XN

8.2.4. Sky View Factor Assessment

In accordance with the Section 11 of the DCP with specific reference to 'Procedure B', a SVF Report on the commercial scheme accompanies the PP prepared by BIM Consulting Pty Ltd. The purposes of the SVF report is to demonstrate an equivalent outcome is achieved with regards to varying minimum street setbacks and side and rear setbacks, building form separations and tapering provisions.

Methodology

The SVF analysis was undertaken using the open-source environmental plug in 'Ladybug for Grasshopper' which adds-in to Rhinoceros 3D.

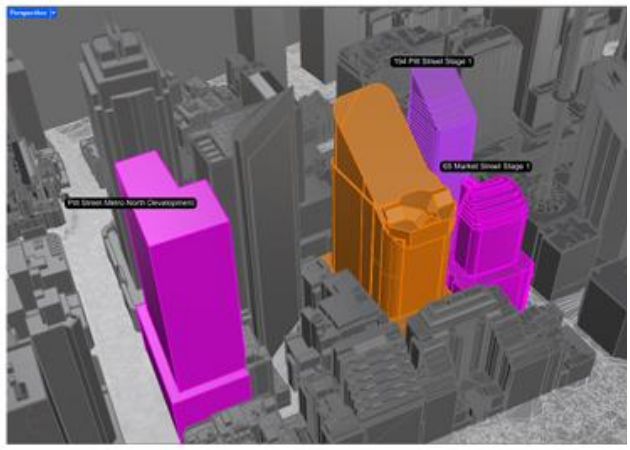
As agreed with Council in consultation workshops, the 'base case' envelope (**Figure 41**) utilised for the purposes of the comparative analysis includes a portion of the existing building on site which penetrates the solar access plane over the site related to Hyde Park, and the two sky bridges above street level.

This envelope was compared to the envelope sought via this PP which seeks variations to the built form controls in the DCP.

The SVF analysis undertaken extended 50 meters from the site boundary. Grid Spacing of every test point was set to 1m, and sky density (the resolution of the imagery generated by the analysis) was set to

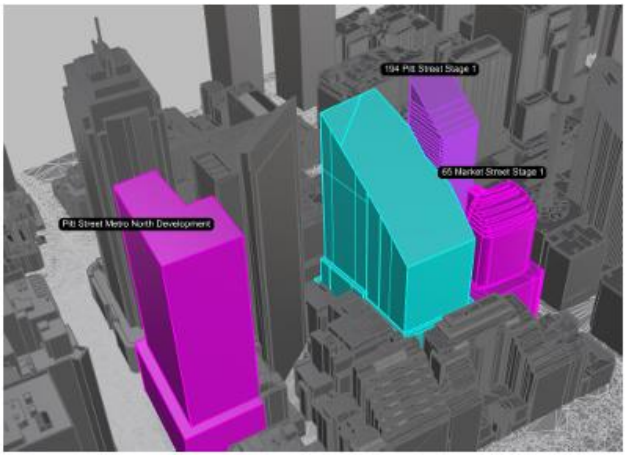
approximately 5500 hemispherical patches (vectors) per test point. The nominated grid spacing, and sky density testing criteria ensures highly accurate results and is therefore considered adequate to satisfy the related requirements.

Figure 41 Base case and proposed planning envelope



Base case envelope

Source: BIM Consulting Pty Ltd



Proposed envelope

Source: BIM Consulting Pty Ltd

Assessment

The analysis undertaken found that there will be an increase in sky visibility between the 'base case' envelope and the proposed envelope sought under this Planning Proposal.

When averaged across all test point options, the proposed envelope will result in an increase of 0.427% of sky visibility from the base case envelope of 10.99% to the proposed envelope of 11.41%.

The PP therefore satisfies the Sydney DCP 2012 Schedule 12 (4)(b) related to increase in daylight factor.

8.2.5. Wind Impact

In accordance with the Section 11 of the Sydney DCP 2012 with specific reference to 'Procedure B', a Wind Environment Report prepared by CPP accompanies the PP. The purpose of the Wind Environment Report is to demonstrate an equivalent outcome is achieved with regards to varying built form controls specified in the Sydney DCP 2012.

The report discusses the results of the wind-tunnel testing study conducted for the PP and provides an interpretive discussion on the impact of the building on the pedestrian level wind comfort and safety.

Methodology

Wind tunnel testing at a 1:400 scale model was undertaken by CPP to assess two scenarios being:

- The 'base case' envelope utilised for the purposes of the comparative analysis – referred to as 'Configuration A'.
- The proposed building envelope under this PP – referred to as 'Configuration B'.

The construction of the physical models were based on the 3D models provided by 3XN. The tunnel testing programme conducted by CPP was undertaken in accordance with relevant requirements with testing conducted for 18 wind direction locations. Weather date recorded at Sydney International Airport by the Bureau of Meteorology was utilised for the purposes of the modelling.

The results of the model were assessed against the wind comfort and safety criteria outlined in Section 5.1.9 of the Sydney DCP 2012, and the Lawson wind comfort and safety criteria.

All testing was completed without trees or landscaping to provide a conservative result for pedestrian safety.

Assessment

The results of the wind study are summarised as follows:

- The majority of wind point study locations around the site are classified as suitable for pedestrian standing type activities from a comfort perspective. All locations pass the safety criteria. Overall, conditions on the ground level are acceptable for general pedestrian access/thoroughfare in all areas from a wind comfort perspective.
- When comparing to the results of the base case envelope, the proposed envelope results in calmer wind conditions to two study locations along Pitt Street and a change of rating from pedestrian standing to pedestrian sitting.
- In accordance with the Schedule 12 assessment requirements, the 5% exceedance comfort wind speed values in metres per second has been averaged and compared. On average, the wind speed value for the base case is 4.743m/s and the wind speed value for the proposed envelope is 4.741m/s.
- The proposed commercial envelope is therefore an improvement on the base case and meets the 'equivalent' test under Sydney DCP 2012 Schedule 12 (4)(a) related to wind speeds.

8.2.6. Traffic and Transport Impact

A Traffic and Transport Impact Assessment, specific to the commercial scheme and a Footpath Analysis prepared by ARUP accompanies the Planning Proposal and which provides an overview of the existing site conditions, parking and loading assessment, traffic generation, road and footpath network assessment.

Car Parking

The site redevelopment to be facilitated by the PP will result in the rationalisation and improvement of car parking and access to the site resulting in enhanced environmental outcomes for Central Sydney. The key considerations in relating to the provision of car parking are outlined as follows:

Acknowledging the Existence of an Existing Public Car Park

The site currently accommodates 274 car spaces located over a 4 level basement. The car park operates as a public car park allowing for permanent and casual users. The volume of the basement area is significant and is sought to be retained and enhanced as part of the future redevelopment.

It makes practical sense to retain the car parking and utilise the basement void.

Reducing the Overall Quantum of Car Parking

The proposal seeks to reduce the overall quantum of car parking provided on the land to a maximum of 220 car spaces (a circa 22% reduction on the current supply).

Removing the 'Public Car Park' function

The proposal seeks to remove the existing casual parking arrangements in place as part of the operation as a public car park. As a result, it would have the visual and operating characteristics of a private car park, typical of any mixed-use building in the CBD.

It is proposed that car parking would be established on a "reserved basis" forming a "managed car parking" use, as opposed to a public car parking operation that supports casual parking use.

The benefit of this approach is that it reduces the available supply of public car parking, aligned with Council's long term strategy to reduce vehicle traffic in Central Sydney. It also will reduce the number of traffic movements in Central Sydney as set out further below.

Reducing the Ratio of Parking relative to Floor Space Provision

Noting that the redevelopment of the site facilitated by the PP will increase the existing GFA on site, the quantum of car parking proposed is a significant reduction of car parking when applied to the existing rate per sqm of GFA. Car parking as a proportion of the total floor area is proposed to reduce thereby reducing car mode % for the site (i.e. from a current parking ratio of 1 space per 213sqm GFA to approximately 1 space per 476sqm GFA).

Supporting Flexibility Associated with Wesley Mission Use

In the event that Wesley is retained on site, Wesley Mission only requires the majority of the parking demand generated by the use to be available for use on a Sunday and major religious holidays. On this basis, flexibility is sought to make use of these residual parking spaces during the Monday to Saturday period should Wesley be incorporated in future scheme.

Flexibility is sought to allow the available parking supply not used by Wesley to be used during the Monday to Saturday period either for building tenants on the subject land and this is outlined as follows:

Land use	Monday – Saturday allocation (spaces)	Sunday allocation (spaces)
Retail / commercial	185	nil
Wesley	35	220
TOTAL	220	220

Loading and Servicing

The site currently provides two single lane vehicular access ramps from Castlereagh Street. The maximum vehicle height clearance of the entries is 3.2m. Only light vehicles (B99 cars, vans, utes) and Small Rigid Vehicles (SRVs) can currently access the loading dock.

The reference scheme seeks to consolidate and retain use of the southern ramp access. The retention of the existing ramps resultingly limits loading dock access to light vehicles (cars, vans, utes) and SRVs. The maximum height of a vehicle accessing the loading dock on Level P1 is proposed to be 4.5m to accommodate various delivery services. The largest vehicle expected to enter the basement levels is proposed to be a 6.4m long SRV. Swept paths are provided with the submission.

Further design work will occur during the design competition and development application stage to improve the efficiency and functionality of the basement and loading function.

The Sydney DCP 2012 requires the provision of a minimum of 26 loading bays. However, ARUP have assessed alternative service and loading requirements and identify:

- Based upon the TfNSW Urban Freight Forecasting Model (**UFFM**), the development will require 20 loading bays. The UFFM estimates daily profiles of the vehicle demand that a building is likely to generate, and the optimum quantum of loading bays to achieve 95% efficacy (i.e. at least 95% of arriving vehicles are accommodated throughout the day). The UFFM models a managed dock operation, which leads to higher utilisation of fewer loading bays.

The reference scheme proposes loading at basement level 1, level S and provides:

- 8 van bays at P1;
- 6 SRV + 1 van bays at PS

ARUP considers this is suitable at this stage and note the future DA will be designed to meet the required loading and servicing bays as suggested by TfNSW's UFFM calculation.

A Loading Dock Management Plan will be prepared prior to future occupation of the building to further manage use of the loading dock.

Traffic Generation and Access Arrangements

The site redevelopment facilitated by the PP for the commercial concept scheme will have a minimal impact on traffic generation and enhance site access and egress.

These outcomes will be achieved as follows:

- The development will have a reduction of 50 vehicle trips during the PM peak period compared to existing conditions and would generate an additional 25 vehicle trips per hour over existing conditions during AM peak period. The volumes during the AM peak period would equate to an additional vehicle trip being generated every minute compared to the existing condition and is considered to result in minimal impacts on the surrounding road network. In summary, the traffic impacts for the development are considered negligible.
- The existing southern ramp will be upgraded to serve as a single-lane, bi-directional, access controlled ramp for all vehicle access. An integrated off-street waiting bay is proposed at the entrance on Castlereagh Street. The proposal includes the removal the parallel vehicle ramp along Castlereagh Street, improving the public domain. The proposed access arrangements are appropriate to cater for the estimated level of traffic generation.

- The operation of the Castlereagh Street access will allow a mixture of 2-way access to the car parking and loading bays, with 1-way access at the entrance/exit point. To reduce the likelihood of queuing on Castlereagh Street, and to prioritise footpath space for walking and cycling, a waiting bay is provided for outbound traffic.
- The through-site link in the reference design provides an improved linkage between Pitt Street and Castlereagh Street that will provide a legitimate link for pedestrians who want to travel east west. This has the potential to take pedestrian traffic off the surrounding footpath network.

8.2.7. Acoustic Impact Assessment

An Acoustic Impact Assessment specific to commercial land use accompanies the Planning Proposal which provides a high level acoustic assessment of the proposed land uses and built form elements in the commercial reference scheme. Noting that no built form components are proposed, a qualitative assessment is provided to confirm that the future building is capable of achieving relevant acoustic criteria.

Existing Acoustic Environment

The primary environmental acoustic factors with the potential to influence the development are:

- Existing road traffic noise from Pitt Street, Castlereagh Street, and to a lesser extent, Market Street and Park Street.
- Ground borne noise and vibration from operation of the Sydney Metro City & Southwest Metro.
- Building services and entertainment noise from future mixed-use development located 65-77 Market Street and 194-204 Pitt Street (City Tattersalls Club).

Long term noise monitoring was undertaken from 29 June to 5 July 2020 on level 3 of the existing Piccadilly Complex toward Pitt Street. In addition, long term noise monitoring results have been obtained from separate noise and vibration assessments for City Tattersalls development (2019) and David Jones development (2019). It was determined that updated monitoring was not required due to the construction noise on adjacent sites impacting the results.

Observations on site and further analysis of the measurement data indicate that noise levels at the ARUP monitoring location are influenced by existing plant associated with the Piccadilly Complex and therefore future noise levels may be lower than measured post development. The ultimate noise impacts will, however, depend on future plant noise from the adjacent development sites and the future Piccadilly Complex.

Acoustic Impact

Noise emissions generated from the site during the operational stage of the development would not be anticipated to impact on surrounding land uses. The following section provides a high-level assessment of the anticipated acoustic impacts associated with the future development.

Pedestrian Link

While the PP does not seek consent for specific uses within the northerly aligned pedestrian link, a preliminary assessment has been carried out by ARUP to evaluate potential implications upon nearby noise sensitive developments, including the future residential development approved for 77 Market Street and 194 Pitt Street. Given the desire to create a ‘destination’, the reference scheme incorporates retail tenancies along the through site link, as well as an open void that will be open to the sky to provide natural ventilation and daylight. As such, it is anticipated that there may be desire for activity or events that may be of a higher intensity than a passive pedestrian link.

It is noted that future noise sensitive residential development to the north are required to achieve specific internal noise levels, which would be based on the existing ambient noise environment. Noise modelling has been carried out for the conceptual reference design, with a primary focus on noise propagation via the central void to the future development to the north. Noise modelling is based upon a uniform source of noise along the length of the through site link.

While more detailed assessment is warranted to take into account the detailed architecture and uses within the TSL, based on the measured background noise levels of between 58 to 62 dB(A) (night and day respectively) and background levels between 57 and 61 dB(A) (night and day respectively), low to medium type activation uses would be appropriate for the TSL in consideration of the surrounding sensitive receivers.

A more detailed assessment will be carried out to inform the architecture through the Design Competition process and as part of the future DA.

Building Services

The primary operational noise associated with the reference scheme is expected to be building services equipment. ARUP recommend that appropriate selection of low noise equipment and standard noise control methods such as attenuators to mitigate acoustic impacts of mechanical services equipment. This will be further addresses at the detailed DA stage.

Road Traffic Generation

As outlined in the ARUP Traffic Report, the reference scheme is not expected to give rise to a material increase in road traffic generation. The indicative redevelopment in accordance with the proposed planning provisions is therefore not anticipated to result in an increase in road traffic noise to the surrounding receivers. In addition to general traffic generation, it is considered that noise from basement loading docks can be appropriately managed

Construction Noise and Vibration

Assessment of construction noise and vibration assessment will be further detailed at the detailed DA stage. This will include detailed assessment of potential vibration impacts associated with any excavation required.

Conclusion

The future building on the site is capable of achieving relevant acoustic policies and standards. Further detailed acoustic and vibration studies will accompany the detailed DA stage to inform the building design, confirm that the future building can meet relevant acoustic criteria, and recommend more specific mitigation and management strategies.

8.3. MIXED USE SCHEME

8.3.1. Building Podium Height and Tower Setbacks

Overall the mixed use building envelope and concept reference scheme are built on the same core fundamentals as the commercial scheme.

Similarly, the proposed envelope has been devised with consideration of the objectives and controls in the planning policies as well as an appropriate urban contextual response and recognising the top of the building has the potential to accommodate a residential land use.

Podium

The podium form of the mixed use scheme is unchanged from that described in **Section 8.2.1** and make the following comments:

- The podium heights have been established to align with the predominant or prevailing podium height of the adjoining developments.

- The Sydney DCP 2012 requires a street frontage height of 20-35m greater than 55m and up to 120m, and 20-25m for buildings greater than 120m. The envelope is therefore non-compliant with these provisions. As such in order to vary these controls, detailed assessment has been undertaken against Procedure B in Schedule 12 of the DCP which compares a base case building massing to the proposed non-compliant building envelope sought via this PP. Where equivalent or improved wind safety and daylight levels (determined by average SVF in adjacent public places is demonstrated, variations may be permitted. This non-compliance is justified as:

  – A summary of the outcomes of the SVF assessment and wind impact assessment undertaken to justify the variations to the built form controls is detailed in Section 8.3.5 and 8.3.6 and accompanying SVF and wind reports relevant to a mixed use outcome. These assessments confirm that an equivalent outcome is achieved with regards to varying minimum street setbacks and side and rear setbacks, building form separations and tapering provisions.

- It is noted that internally within the podium, the mixed use scheme exhibits an alternate ground floor and basement levels.

Tower

Consistent with the approach to the podium, the proposed tower setbacks are responsive to context, removal of SAP breach and the retention of the existing structure. Similarly the tower setbacks result in variable side setback requirements which is reflective of the retained commercial tower and the distinctive sloped building height plane and as such also results in partial non compliances against the DCP.

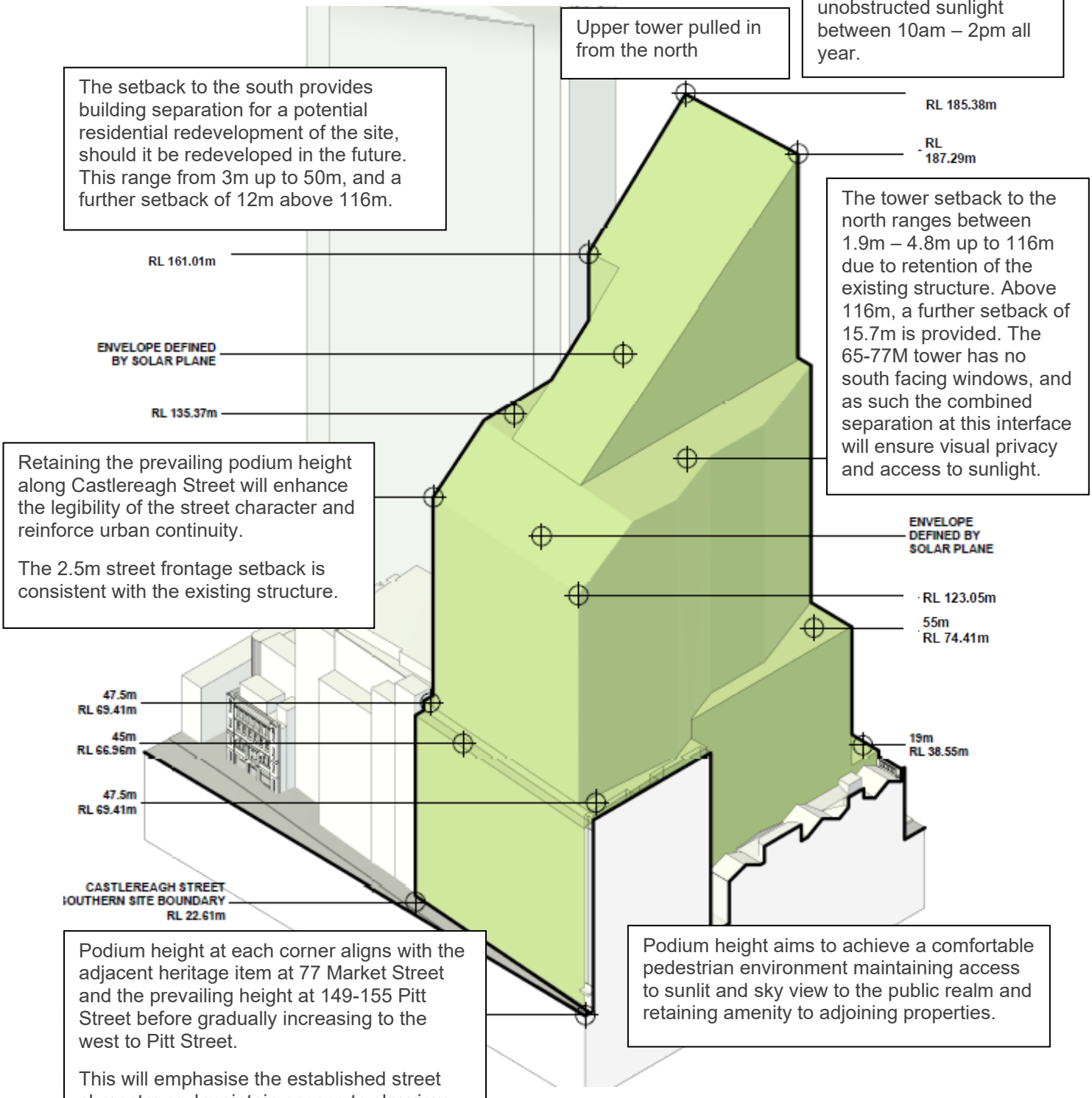
The tower setbacks result in variable side setback requirements which is reflective of the distinctive sloped building height plane and as such also results in partial non compliances against the DCP.

The Sydney DCP 2012 requires minimum street setbacks of 8m and a side and rear setback of 4m for buildings greater than 55m up to 120m, and 3.33% of the proposed total height of building for development greater than 120m up to 240m. The envelope is therefore non-compliant with these provisions and as per the podium appropriate equivalence testing has been undertaken, i.e. comparison of base case building massing to the proposed non-compliant building envelope sought via this Planning Proposal. Where equivalent or improved wind safety and daylight levels (determined by average SVF in adjacent public places is demonstrated. These assessments confirm that an equivalent outcome is achieved with regards to varying minimum street setbacks and side and rear setbacks, building form separations and tapering provisions.

The key move that is different from the commercial concept reference scheme is the upper tower whereby the tower pulls back from the north to ensure increased amenity is afforded to the subject site and adjoining developments.

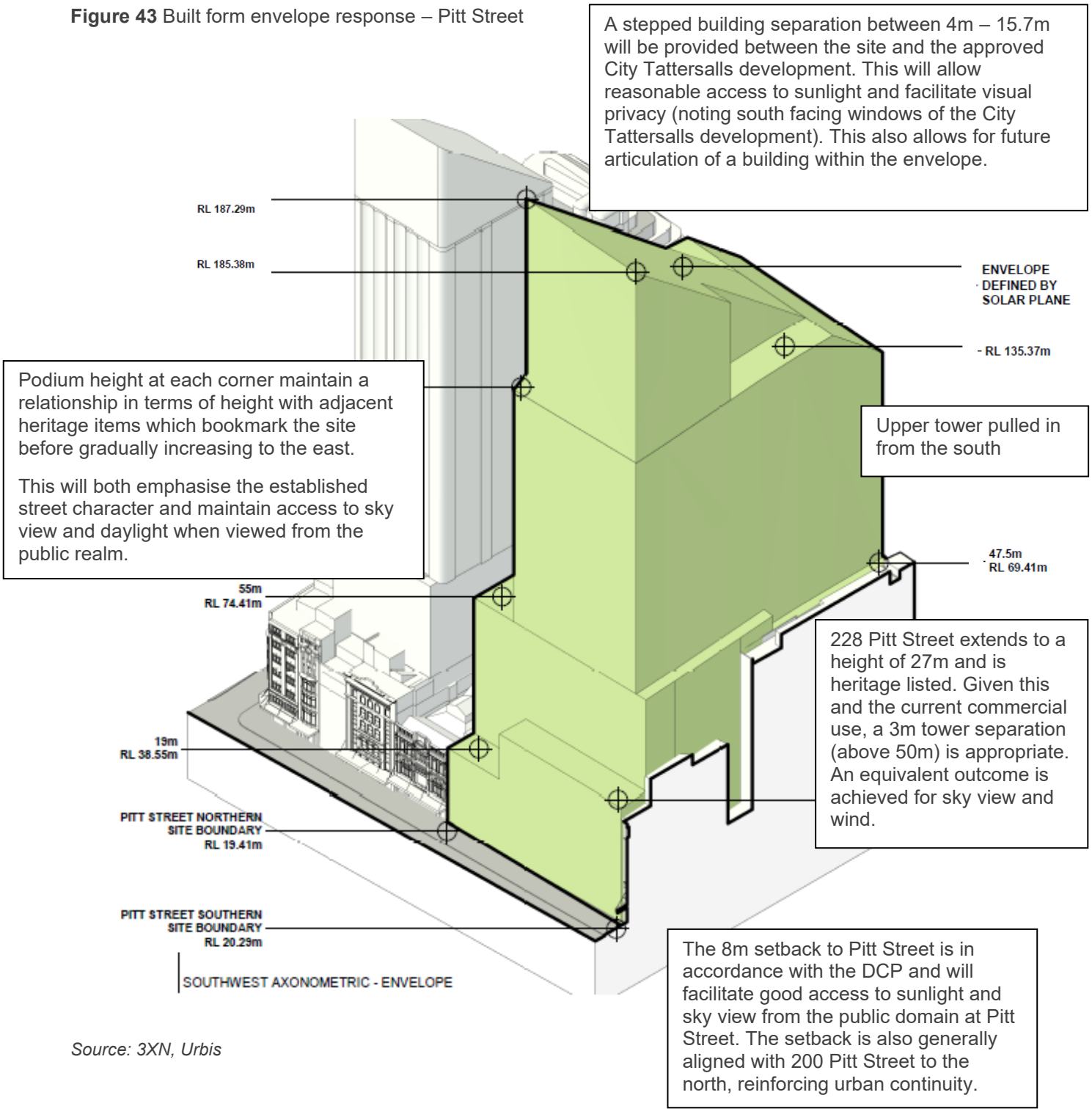
- In summary, the tower setbacks to the side boundaries are appropriate having regard to the side separation to the proposed residential developments to the north, including:
  - Respecting the future City Tattersalls Club residential interface on the north western end, through a combined 23m building separation between the towers at the lower tower and a combined 26m separation from the upper tower (residential).
  - Provision of a range of 7.9m to 10.8m combined tower separation to 77 Market Street (which has no south facing apartments) to allow for adequate daylight and outlook to both developments.
- The southern side tower setbacks are no less than 3m and is appropriate when considering:
  - The development potential of 228 Pitt Street, being a heritage item and therefore being constrained by heritage considerations as well as the site area limiting the future building height.
  - 149-155 Castlereagh Street is currently a commercial development and given the strong incentivisation of employment floor space under the Central Sydney Planning Strategy, it is likely that this future development would continue to be commercial in nature. Notwithstanding this, as per the feedback from the City, the potential future residential development is considered on this site resulting in a total 6m building separation, with an increase 12m side setback for the central portion.
  - The tower setbacks ensure there is appropriate consideration of amenity in terms of daylight, outlook, view sharing, ventilation, wind mitigation and privacy for nearby residential buildings.

Figure 42 Built form envelope response – Castlereagh Street



Source: 3XN, Urbis

Figure 43 Built form envelope response – Pitt Street



Source: 3XN, Urbis

8.3.2. Overshadowing

As discussed in **Section 5.1.2,** the eastern portion of the top of the existing building on the site breaches the Hyde Park SAP provisions. The building envelope proposed through this Planning Proposal is consistent with the Hyde Park SAP resulting in no overshadowing of Hyde Park.

8.3.3. Residential Amenity

The concept reference scheme prepared by 3XN demonstrates potential land use distribution and layout within the building envelope, which informs the proposed planning provisions. An assessment of the reference scheme against the criteria contained in the Apartment Design Guide is addressed in the urban design report submitted in the PP submission.

It is envisaged, as proposed by the concept reference scheme, that any residential land uses will be distributed in the tower form which will be from level 29 – level 39.

As discussed in the 3XN urban design report submitted in the PP package, the envelope:

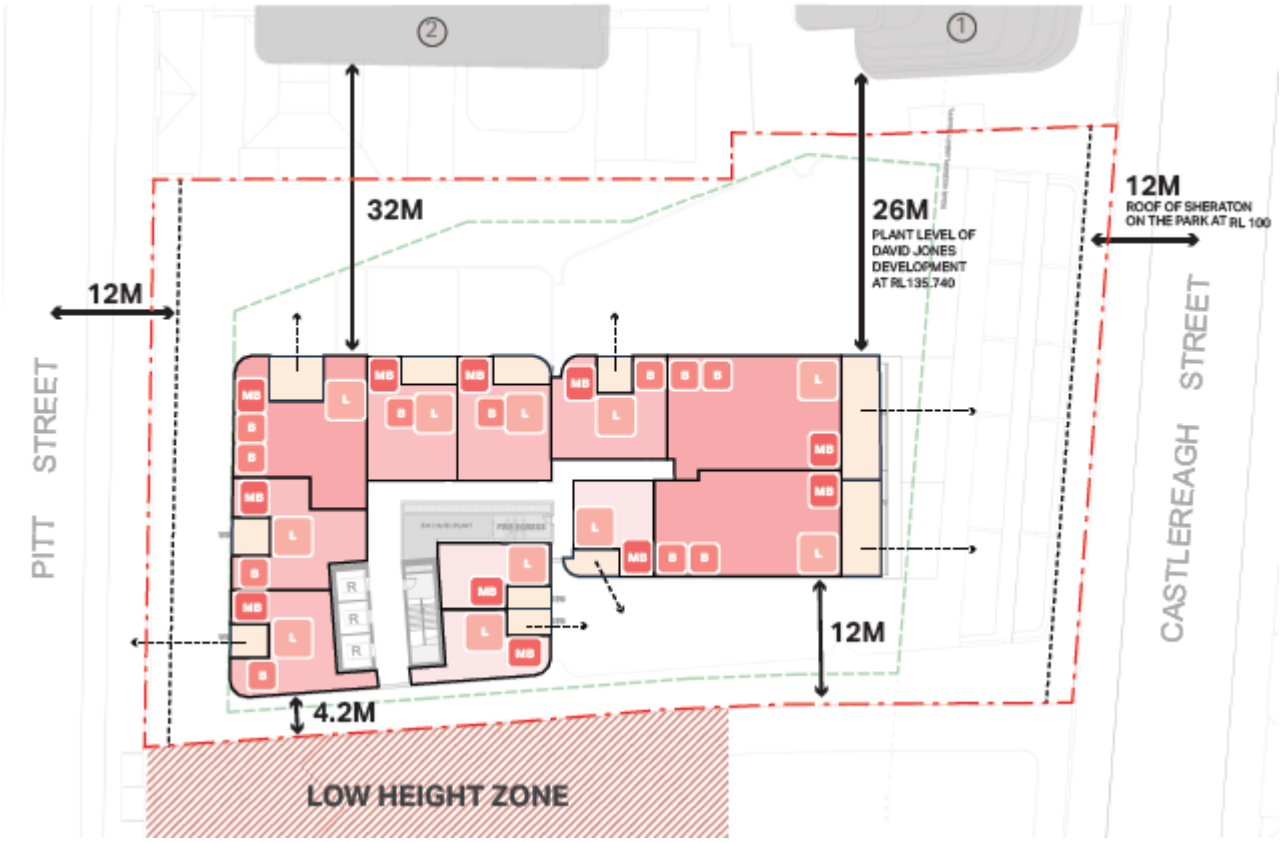
- prioritises a northern setback as a response to the neighbouring residential developments,
- provides building separation which exceeds ADG requirements, resulting in enhanced visual privacy and solar access, and
- reduces building bulk and improves sky view access through introduction of a greater setback at the top of the envelope.

A summary of compliance with key ADG design criteria is provided in **Table 17.**

Table 17 Assessment of residential amenity

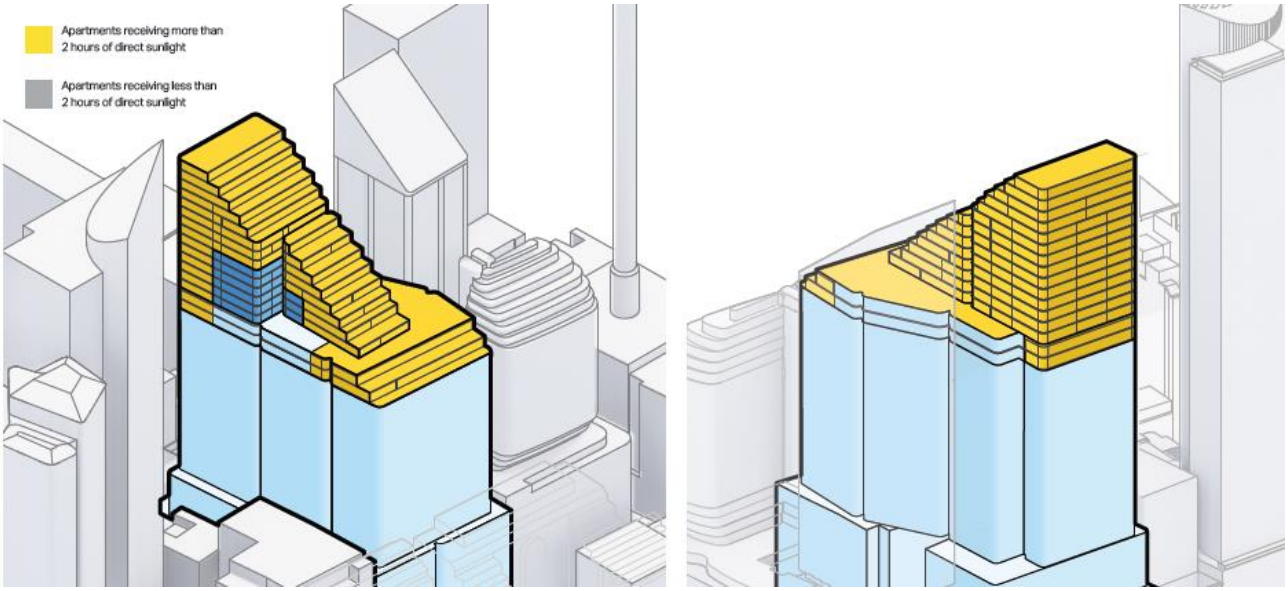
Design criteria	Concept reference scheme
2D Common Open Space: 25%	Reference design has approximately 600sqm of common open space, equivalent to 12.5% of the site area, but is also next to Hyde Park
2f Building Separation: Up to 12m: 6m – 12m, Up to 25m: 9m – 18m, Over 25m: 12m – 24m	Compliant with building separation requirement in all residential levels. Residential apartments which are only 3m from the southern site boundary will have a single orientation.
3E Deep soil: 7%	N/A – Retention of existing basement.
4A Solar Access: Living rooms and private open space of at least 70% of apartments are to receive a minimum of 2 hours direct sunlight between 9 am and 3 pm in mid-winter. 15% no direct sunlight between 9am and 3pm at mid-winter.	85% solar access 15% no direct sunlight between 9am and 3pm at mid-winter.
4B Natural Ventilation: At least 60% of apartments are naturally cross ventilated in the first nine storeys of the building.	N/A – Residential dwellings are provided between level 29 – level 42.
4D Apartment Size and Layout, and 4K Apartment Mix: Minimum requirements for apartment size and mix.	(a) Studio: 0 (b) 1 bedroom: 15.6% (c) 2 bedroom: 39.6% (d) 3+ bedroom: 44.8%

Figure 44 Building separation diagram



Source: 3XN

Figure 45 Solar access diagram



Source: 3XN

8.3.4. Visual Impacts

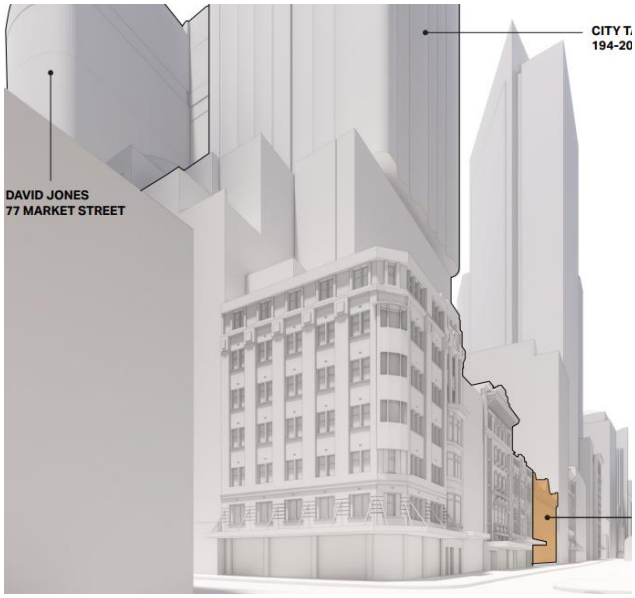
To determine the visual impact assessment of the reference scheme compared to the existing Piccadilly Complex 3XN have prepared a series of building massing diagrams scheme from key vantage points in the public domain (refer **Figure 46** and **Figure 47**).

The visual impacts of the built form are most noticeable from Pitt Street noting that the existing Piccadilly tower is located toward the east of the site at Castlereagh Street and the built form at this streetscape will be somewhat unchanged. As noted throughout this report, the building envelope is appropriately setback at this frontage to allow access to sky view and daylight at the public domain. The removal of the sky bridges will result in an improved outcome from the public domain.

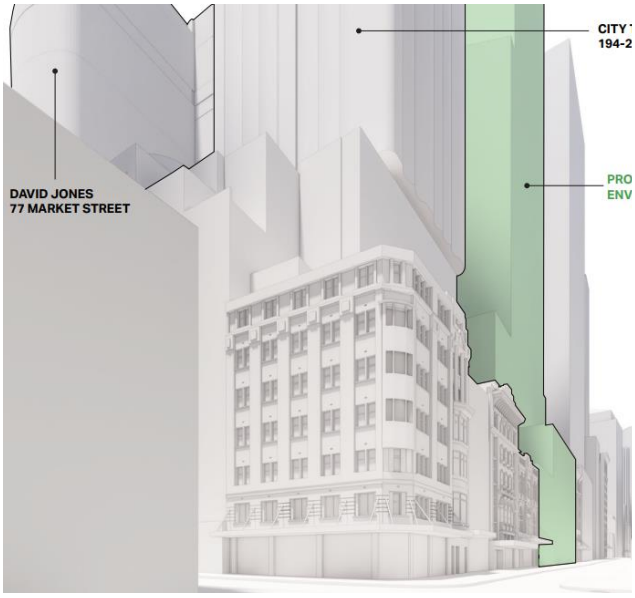
In addition, it is noted that the future surrounding development at City Tattersalls Club (194 Pitt Street) and the David Jones Building (65-77 Market Street) will conceal views of the building from the public domain at Pitt Street the corner of Pitt and Market Street.

The vantage point from Hyde Park presented in Figure 45 demonstrates that the envelope will result in a built form outcome which is in keeping with the CBD context in which it is located. As a result of the Hyde Park Sun Access Plane, the future building is purposefully visible from the public domain noting that it will be assured of achieving design excellence through a competitive design process.

Figure 46 Building massing diagrams from key vantage points



Existing view from Pitt Street south



Proposed view from Pitt Street south

Figure 47 Building massing diagrams from key vantage points

7Existing view from Hyde Park looking west

Source: 3XN

8 Proposed view from Hyde Park looking west

Source: 3XN

8.3.5. Sky View Factor Assessment

In accordance with the Section 11 of the DCP with specific reference to 'Procedure B', a SVF Report relevant to a mixed use envelope accompanies the PP prepared by BIM Consulting Pty Ltd. The purposes of the SVF report is to demonstrate an equivalent outcome is achieved with regards to varying minimum street setbacks and side and rear setbacks, building form separations and tapering provisions.

Methodology

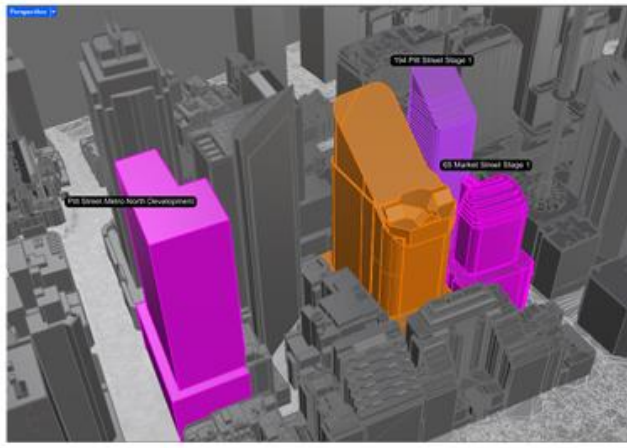
The SVF analysis was undertaken using the open-source environmental plug in 'Ladybug for Grasshopper' which adds-in to Rhinoceros 3D.

As agreed with Council in consultation workshops, the 'base case' envelope (**Figure 48**) utilised for the purposes of the comparative analysis includes a portion of the existing building on site which penetrates the solar access plane over the site related to Hyde Park, and the two sky bridges above street level.

This envelope was compared to the envelope sought via this PP which seeks variations to the built form controls in the DCP.

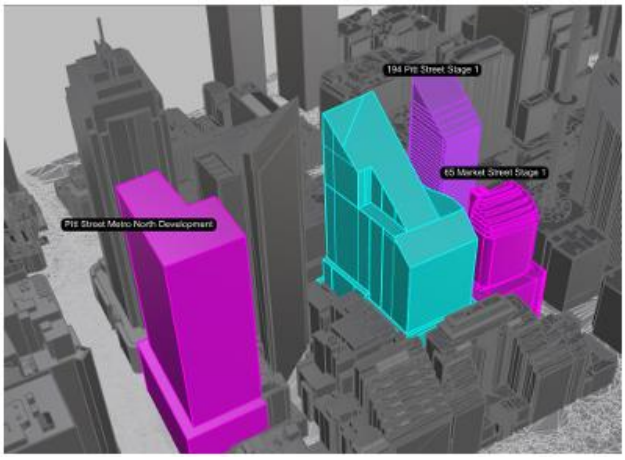
The SVF analysis undertaken extended 50 metres from the site boundary. Grid Spacing of every test point was set to 1m, and sky density (the resolution of the imagery generated by the analysis) was set to approximately 5500 hemispherical patches (vectors) per test point. The nominated grid spacing, and sky density testing criteria ensures highly accurate results and is therefore considered adequate to satisfy the related requirements.

Figure 48 Base case and proposed planning envelope



Picture 9 Base case envelope

Source: BIM Consulting Pty Ltd



Picture 10 Proposed envelope

Source: BIM Consulting Pty Ltd

Assessment

The analysis undertaken found that there will be an increase in sky visibility between the 'base case' envelope and the proposed envelope sought under this Planning Proposal.

When averaged across all test point options, the proposed envelope will result in an increase of 0.456% of sky visibility from the base case envelope of 10.99% to the proposed envelope of 11.45%.

The PP therefore satisfies the Sydney DCP 2012 Schedule 12 (4)(b) related to increase in daylight factor.

8.3.6. Wind Impact

In accordance with the Section 11 of the Sydney DCP 2012 with specific reference to 'Procedure B', a Wind Environment Report relevant to a mixed use outcome prepared by CPP accompanies the PP. The purpose of the Wind Environment Report is to demonstrate an equivalent outcome is achieved with regards to varying built form controls specified in the Sydney DCP 2012.

The report discusses the results of the wind-tunnel testing study conducted for the PP and provides an interpretive discussion on the impact of the building on the pedestrian level wind comfort and safety.

Methodology

Wind tunnel testing at a 1:400 scale model was undertaken by CPP to assess two scenarios being:

- The 'base case' envelope utilised for the purposes of the comparative analysis – referred to as 'Configuration A'.
- The proposed building envelope under this PP – referred to as 'Configuration B'.

The construction of the physical models were based on the 3D models provided by 3XN. The tunnel testing programme conducted by CPP was undertaken in accordance with relevant requirements with testing conducted for 18 wind direction locations. Weather date recorded at Sydney International Airport by the Bureau of Meteorology was utilised for the purposes of the modelling.

The results of the model were assessed against the wind comfort and safety criteria outlined in Section 5.1.9 of the Sydney DCP 2012, and the Lawson wind comfort and safety criteria.

All testing was completed without trees or landscaping to provide a conservative result for pedestrian safety.

Assessment

The results of the wind study are summarised as follows:

- The majority of wind point study locations around the site are classified as suitable for pedestrian standing type activities from a comfort perspective, with one location to the north-east on Castlereagh Street meeting the sitting classification. All locations pass the safety criteria. Overall, conditions on the ground level are acceptable for general pedestrian access/thoroughfare in all areas from a wind comfort perspective.
- In accordance with the Schedule 12 assessment requirements, the 5% exceedance comfort wind speed values in metres per second has been averaged and compared. On average, the wind speed value for the base case is 4.743m/s and the wind speed value for the proposed envelope is 4.739m/s.
- The proposed envelope is therefore an improvement on the base case and meets the 'equivalent' test under Sydney DCP 2012 Schedule 12 (4)(a) related to wind speeds.

8.3.7. Traffic and Transport Impact

A Traffic and Transport Impact Assessment relevant to a mixed use outcome and a Footpath Analysis prepared by ARUP accompanies the Planning Proposal which provides an overview of the existing site conditions, parking and loading assessment, traffic generation, road and footpath network assessment.

Car Parking

The site redevelopment to be facilitated by the PP will result in the rationalisation and improvement of car parking and access to the site resulting in enhanced environmental outcomes for Central Sydney. The key considerations in relating to the provision of car parking are outlined as follows:

Acknowledging the Existence of an Existing Public Car Park

The site currently accommodates 274 car spaces located over a 4 level basement. The car park operates as a public car park allowing for permanent and casual users. The volume of the basement area is significant and is sought to be retained and enhanced as part of the future redevelopment.

It makes practical sense to retain the car parking and utilise the basement void.

Reducing the Overall Quantum of Car Parking

The proposal seeks to reduce the overall quantum of car parking provided on the land to a maximum of 185 car spaces (a circa 32% reduction on the current supply).

Removing the 'Public Car Park' function

The proposal seeks to remove the existing casual parking arrangements in place as part of the operation as a public car park. As a result, it would have the visual and operating characteristics of a private car park, typical of any mixed-use building in the CBD.

It is proposed that car parking would be established on a "reserved basis" forming a "managed car parking" use, as opposed to a public car parking operation that supports casual parking use.

The benefit of this approach is that it reduces the available supply of public car parking, aligned with Council's long term strategy to reduce vehicle traffic in Central Sydney. It also will reduce the number of traffic movements in Central Sydney as set out further below.

Reducing the Ratio of Parking relative to Floor Space Provision

Noting that the redevelopment of the site facilitated by the PP will increase the existing GFA on site, the quantum of car parking proposed is a significant reduction of car parking when applied to the existing rate per sqm of GFA. Car parking as a proportion of the total floor area (excluding the residential component) is proposed to reduce thereby reducing car mode % for the site (i.e. from a current parking ratio of 1 space per 213sqm GFA to approximately 1 space per 822sqm GFA).

Aligning residential car parking to the LEP

The proposal retains the basement structure and accordingly has a surplus of car parking reflecting the historical use as public car park. The provision of car parking for any residential land use portion of the site will be required to be compliant with the SLEP, in the event a mixed use outcome is progressed on site.

By way of a summary, the concept reference scheme shows the breakdown of car parking as per the current LEP provisions:

Land use	Monday – Sunday allocation (spaces)
Residential	75
Retail / commercial	110
TOTAL	185

Loading and Servicing

The site currently provides two single lane vehicular access ramps from Castlereagh Street. The maximum vehicle height clearance of the entries is 3.2m. Only light vehicles (B99 cars, vans, utes) and Small Rigid Vehicles (SRVs) can currently access the loading dock.

The reference scheme seeks to consolidate and retain use of the southern ramp access. The retention of the existing ramps resultingly limits loading dock access to light vehicles (cars, vans, utes) and SRVs. However as residential land use is proposed in this reference scheme, Council's MRV sized waste truck has been accommodated on site, including through the use of a turntable at Level S. Below this loading dock level, the height is restricted 2.4m and as such would not accommodate either an SRV or an MRV. Further design work will occur during the design competition and development application stage to improve the efficiency and functionality of the basement and loading function.

The Sydney DCP 2012 requires the provision of a minimum of 24 loading bays. However, ARUP have assessed alternative service and loading requirements and identify:

- Based upon surveys in the CBD of commercial buildings, ARUP estimate the development will require at least 15 loading bays.
- Based upon the TfNSW Urban Freight Forecasting Model (UFFM), the development will require 19 loading bays. The UFFM estimates daily profiles of the vehicle demand that a building is likely to generate, and the optimum quantum of loading bays to achieve 95% efficacy (i.e. at least 95% of arriving vehicles are accommodated throughout the day). The UFFM models a managed dock operation, which leads to higher utilisation of fewer loading bays.
- The reference scheme proposes loading at basement level 1, level S and the ground floor, and provides:

- 11 van bays,
- 6 SRV bays, and
- 1 MRV loading bay.

ARUP consider this is suitable at this stage and note the future DA will be designed to meet the required loading and servicing bays as suggested by TfNSW's UFFM calculation.

A Loading Dock Management Plan will be prepared prior to future occupation of the building to further manage use of the loading dock.

Traffic Generation and Access Arrangements

The site redevelopment facilitated by the PP will have a minimal impact on traffic generation and enhance site access and egress.

These outcomes will be achieved as follows:

- The development will have a reduction of 49 vehicle trips during the PM peak period compared to existing conditions and would generate an additional 21 vehicle trips per hour over existing conditions during AM peak period. The volumes during the AM peak period would equate to an additional vehicle trip being generated every minute compared to the existing condition and is considered to result in minimal impacts on the surrounding road network. In summary, the traffic impacts for the development are considered negligible.
- The existing southern ramp will be upgraded to serve as a single-lane, bi-directional, access controlled ramp for all vehicle access. An integrated off-street waiting bay is proposed at the entrance on Castlereagh Street. The proposal includes the removal the parallel vehicle ramp along Castlereagh Street, improving the public domain. The proposed access arrangements are appropriate to cater for the estimated level of traffic generation.
- The operation of the Castlereagh Street access will allow a mixture of 2-way access to the car parking and loading bays, with 1-way access at the entrance/exit point. To reduce the likelihood of queuing on Castlereagh Street, and to prioritise footpath space for walking and cycling, a waiting bay is provided for outbound traffic.
- The through-site link in the reference design provides an improved linkage between Pitt Street and Castlereagh Street that will provide a legitimate link for pedestrians who want to travel east west. This has the potential to take pedestrian traffic off the surrounding footpath network.

8.3.8. Acoustic Impact Assessment

An Acoustic Impact Assessment relevant to a mixed use outcome accompanies the Planning Proposal which provides a high level acoustic assessment proposed land uses and built form elements. Noting that no built form components are proposed, a qualitative assessment is provided to confirm that the future building is capable of achieving relevant acoustic criteria.

Existing Acoustic Environment

The primary environmental acoustic factors with the potential to influence the development are:

- Existing road traffic noise from Pitt Street, Castlereagh Street, and to a lesser extent, Market Street and Park Street.
- Potential ground borne noise and vibration from operation of the future Stage 2 Sydney Metro City & Southwest.
- Potential building services and entertainment noise from future mixed-use development located 65-77 Market Street and 194-204 Pitt Street (City Tattersalls Club).

Long term noise monitoring was undertaken from 29 June to 5 July 2020 on level 3 of the existing Piccadilly Complex toward Pitt Street. In addition, long term noise monitoring results have been obtained from separate noise and vibration assessments for City Tattersalls development (2019) and David Jones development (2019).

Observations on site and further analysis of the measurement data indicate that noise levels at the ARUP monitoring location are influenced by existing plant associated with the Piccadilly Complex and therefore

future noise levels may be lower than measured post development. The ultimate noise impacts will, however, depend on future plant noise from the adjacent development sites and the future Piccadilly Complex.

Acoustic Impact

Noise emissions generated from the site during the operational stage of the development would not be anticipated to impact on surrounding land uses. The following section provides a high-level assessment of the anticipated acoustic impacts associated with the future development.

Residential Dwellings

Section 2.120 of the T&I SEPP outlines acoustic requirements and considerations for residential development and place of public worship adjacent to road corridors.

In addition to the T&I SEPP, ARUP note additional considerations for residential development are outlined in:

- Housing SEPP and Apartment Design Guide
- Section 4.2.3.9 and Section 4.2.3.11 of the Sydney DCP 2012
- Draft Alternative natural ventilation of apartments in noisy environments (2018)

Considerations of maintaining natural ventilation to apartments whilst protecting the internal acoustic amenity of the dwellings will be further addressed at the detailed DA stage.

ARUP note that as the residential uses in the upper tower level, these are sufficiently removed from the Sydney Metro rail tunnels and as not anticipated to be impacted by vibration or noise from Sydney Metro.

Pedestrian Link

While the PP does not seek consent for specific uses within the northerly aligned pedestrian link, a preliminary assessment has been carried out by ARUP to evaluate potential implications upon nearby noise sensitive developments, including the future residential development approved for 77 Market Street and 194 Pitt Street. Given the desire to create a ‘destination’, the reference scheme incorporates retail tenancies along the through site link, as well as an open void that will be open to the sky to provide natural ventilation and daylight. As such, it is anticipated that there may be desire for activity or events that may be of a higher intensity than a passive pedestrian link.

It is noted that future noise sensitive residential development to the north are required to achieve specific internal noise levels, which would be based on the existing ambient noise environment. Noise modelling has been carried out for the conceptual reference design, with a primary focus on noise propagation via the central void to the future development to the north. Noise modelling is based upon a uniform source of noise along the length of the through site link.

The noise modelling undertaken has concluded that the through site link and use of this space for low to medium type activation uses can achieve relevant acoustic criteria. A further detailed acoustic assessment of the impacts associated with the pedestrian link will be undertaken to accompany the future detailed DA.

Building Services

The primary operational noise associated with the reference scheme is expected to be building services equipment. ARUP recommend that appropriate selection of low noise equipment and standard noise control methods such as attenuators to mitigate acoustic impacts of mechanical services equipment. This will be further addresses at the detailed DA stage.

Road Traffic Generation

As outlined in the ARUP Traffic Report, the reference scheme will result in a reduction in vehicle trips in the PM peak period and a minor increase in volumes in the AM peak period. The indicative redevelopment in accordance with the proposed planning provisions is therefore not anticipated to result in an increase in road traffic noise to the surrounding receivers.

Construction Noise and Vibration

Assessment of construction noise and vibration assessment will be further detailed at the detailed DA stage. This will include detailed assessment of potential vibration impacts associated with any excavation required.

Conclusion

The future building on the site is capable of achieving relevant acoustic policies and standards. Further detailed acoustic and vibration studies will accompany the detailed DA stage to inform the building design, confirm that the future building can meet relevant acoustic criteria, and recommend more specific mitigation and management strategies.

8.4. OTHER RELEVANT MATTERS COMMON TO ALL SCHEMES

The following section covers commentary applicable to both proposed development outcomes and covers matters that are more land based in their assessment such as geotechnical, flooding, rail impact and the like.

8.4.1. Pedestrian Safety and Comfort Levels

The site redevelopment facilitated by the PP will improve pedestrian safety and access. The methodology of the Pedestrian Report to assess this is as follows:

- The pedestrian footpath analysis has been prepared in accordance with the requirements set by the Council Guidelines for Site Specific Planning Proposals which require that a Pedestrian Comfort Level (PCL) assessment be prepared in accordance with the Transport for London (TfL) pedestrian comfort guidance document.
- TfL's PCL tool requires that pedestrian activity and movement on footpaths and formal crossings be assessed under existing conditions. No mention is made of assessment of future year scenarios. The approach taken in the analysis considers the uplift demand generated by the building upon completion and qualitatively compares it to the available and potential footpath widths.
- Footpaths assessed are highlighted in pink in **Figure 49.**

Figure 49 Pedestrian footpaths analysed

Source: ARUP

- Observations of footpath infrastructure analysed in the study area was undertaken on 29 June 2020 and included a review of footpath widths and obstructions. As the assessment was undertaken during the COVID-19 pandemic, ARUP have also analysed recent development applications in the vicinity of the site including City Tattersalls DA, David Jones DA, Chatswood to Sydenham EIS (May 2016), and the

Gadigal Station interchange access plan (2024). In addition, a site visit was undertaken on 24 September 2024.

- The pedestrian performance was assessed under a 'base case' and future development scenario where pedestrian counts were available. Where these were not available, the AM peak development scenario and a qualitative assessment of the existing footpath's ability to support future increase in demand was assessed.
- An assessment of estimate footpath volumes is also informed by a range of assumptions, Journey to Work data, Opal data.

Key findings of the assessment can be summarised as follows:

- All the six footpaths within the study area already have effective widths less than the required widths under the NSW Walking Space Guide (WSG) requirements, and all assessed footpaths evaluated on existing conditions, without the development, fail to meet a WSG LoS of C, which is the minimum target criterion. An intervention would be needed to be provided to increase the footpath widths (i.e. without the development).
- When considering the pedestrian volumes post-development, all footpaths have small increases in demand (i.e. in PPMM) that are considered to be negligible. There is an increase of between 0.5 PPMM to 5.5 PPMM estimated.
- The pedestrian volumes generated by the development examined in isolation will have negligible additional effective walking space width demands compared to total available widths of the more critical footpaths assessed.
- The existing driveway on Castlereagh Street that provides access to the basement car park currently has a major impact on the quality of the pedestrian experience along the footpath. The proposed reference design for vehicular access is therefore a substantial improvement in terms of pedestrian experience and continuity of shoreline for people with disabilities.
- The existing through site link includes horizontal shifts as well as level changes and is not an attractive or intuitive option for thoroughfare movements. The proposed development includes a substantially improved through-site link which is wider, has unobstructed views and has gentle ramps connecting Pitt Street and Castlereagh Street. It will provide a legitimate link for pedestrians who want to travel east west.

8.4.2. Ecologically Sustainable Development

Sustainable Design Strategy Reports (one considering a commercial scheme and the other a mixed use scheme) prepared by ARUP accompanies the Planning Proposal which outlines the sustainable design framework which will be utilised to guide the future development of the site.

- A range of measures are recommended in the report to assist in achieving sustainability targets which will be further detailed in the future DA. These measures include selection of energy efficient lighting and fixtures, rainwater capture and reuse, potential for the site to be fully electric, and exploring carbon offset opportunities.

8.4.3. Flood Impacts

Preliminary flood impact assessments (one considering a commercial scheme and the other a mixed use scheme) prepared by ARUP accompanies the PP. The assessment provides a high-level desktop review of the flooding risks and constraints of the site to confirm that the future development is capable of achieving relevant flooding criteria.

Existing Flooding Environment

ARUP have reviewed the City Area Catchment Flood Study prepared by BMT WBM in October 2014 and the City Area Catchment Floodplain Risk Management Plan both prepared for the Council. These studies confirm that the site is subject to the following flooding risks:

- The site is positioned near the top of the City North stormwater catchment. The critical duration is 25 minutes and 15 minutes for the 100-year Average Recurrence Interval (ARI) and the Probable Maximum Flood (PMF) event respectively in the vicinity of the site.

- During the 100-year ARI event, the peak flood depths are up to 0.17 m within Castlereagh Street, and 0.15 m on Pitt Street.
- For the PMF peak flood depths are up to 0.30 m in Castlereagh Street and 0.40 m in Pitt Street up to 0.1m.

Assessment and Recommendations

The ARUP reports outline the flood planning level requirements for the site based upon the Interim Floodplain Management Policy. In summary:

- All residential development, if proposed, is located above ground and complies with the FMP.
- The governing flood planning levels (FPL) is the 1% AEP + 0.5 m at all of the locations on the ground level. Due to the retention and reuse of the vehicular access points and existing structure, there will be challenges associated with achieving this FPL. A design review by 3XN identifies this will have adverse implications on:
  - Street level activation;
  - Disability Discrimination Act (DDA) compliance; and
  - Vehicle clearance requirements to basement level carpark ramp.
- As such, ARUP have assessed alternative FPL for the ground floor retail and vehicular access. ARUP consider adoption of the PMF level as the applicable FPL (as opposed to 1% AEP + 0.5 m) is relatively low risk at the site as:
  - The site is located near the top of catchment;
  - The site is located away from any significant trapped sag locations, so the potential for flooding within the development resulting from any significant blockage of the drainage network is low; and
  - The sensitivity of peak flood levels at the site to changes in the hydrological assumptions is low, as evidenced by the relatively small differences in the PMF and 1% AEP peak flood levels (less than 0.25m at all reference locations).
- Compliance with the alternate FPL will achieve flood immunity to the maximum PMF without use of flood gates or barriers.

Assessment of FPL will be undertaken further at the future DA stage.

As Piccadilly development (i.e. excluding any public domain works) is contained to within the existing building envelope and will not result in increased runoff compared to existing conditions, it is not anticipated the proposed development will result in any changes to flood affectation within the wider catchment area.

8.4.4. Geotechnical Impacts

A geotechnical desktop analysis prepared by Douglas Partners accompanies the Planning Proposal**.** The report details the existing geotechnical conditions below the site, groundwater and vibration, and details initial recommended design parameters for foundations and shoring walls for the future detailed DA.

The existing ground conditions below the site are characterised by Triassic Age Hawkesbury Sandstone. A geological feature known as the Martin Place Joint Swarm passes through the site. The joint swarm zone comprises closely spaced steeply dipping joints in otherwise medium to high strength rock. Excavating vertical faces in this material may require a retention system or rock bolting to secure any potentially unstable rock wedges.

The groundwater level is expected to be lower than the bulk excavation level due to adjoining basement developments lowering the groundwater level. An existing Telstra runs along Pitt Street adjacent to the site.

Excavation would be required to approximately RL14m in the south western portion of the site below the existing Piccadilly Court Building to facilitate expansion of the basement extent to accommodate the re-positioned carpark access ramp and tower core.

Noting that the final details of excavation and the built form are not known at this stage, the geotechnical investigation details recommended measures to mitigate impacts during excavation required for the basement.

Douglas Partners have recommended that the following geotechnical work be undertaken to inform the detailed DA for the future redevelopment of the site:

- Geotechnical investigation of the site including:
  - Including on-site boreholes and in situ testing to develop a geological model and establish the likely in situ stress conditions and for foundation design
  - Test pits to investigate building footings and foundation conditions adjacent to the proposed excavation beneath the Piccadilly Court Basement
  - Inspection slots in existing basement walls to investigate the ground profile for shoring design.
- Numerical modelling to predict ground movements in relation to the Sydney Metro tunnels and the Telstra tunnel/services along Pitt Street. It is likely that three-dimensional modelling will be required.
  - Geotechnical input into the engineering impact assessment report.
  - Geotechnical input into the risk assessment report.
  - Dilapidation survey of tunnels (subject to Sydney Metro access).

8.4.5. Rail Tunnel Impact

Rail impact reports (one considering a commercial scheme and the other a mixed use scheme) prepared by ARUP accompanies the Planning Proposal. The following section details the location of the Metro tunnels below the site and provides an assessment of the impacts associated with the excavation proposed within the south-western corner of the site below the existing Piccadilly Court Building to regulate the site basement levels.

Existing Conditions

The majority of the existing basement extent reaches approximately 15m below ground comprising 5 basement levels, except for below the Piccadilly Court building which comprises only one basement level at approximately 4m below ground level.

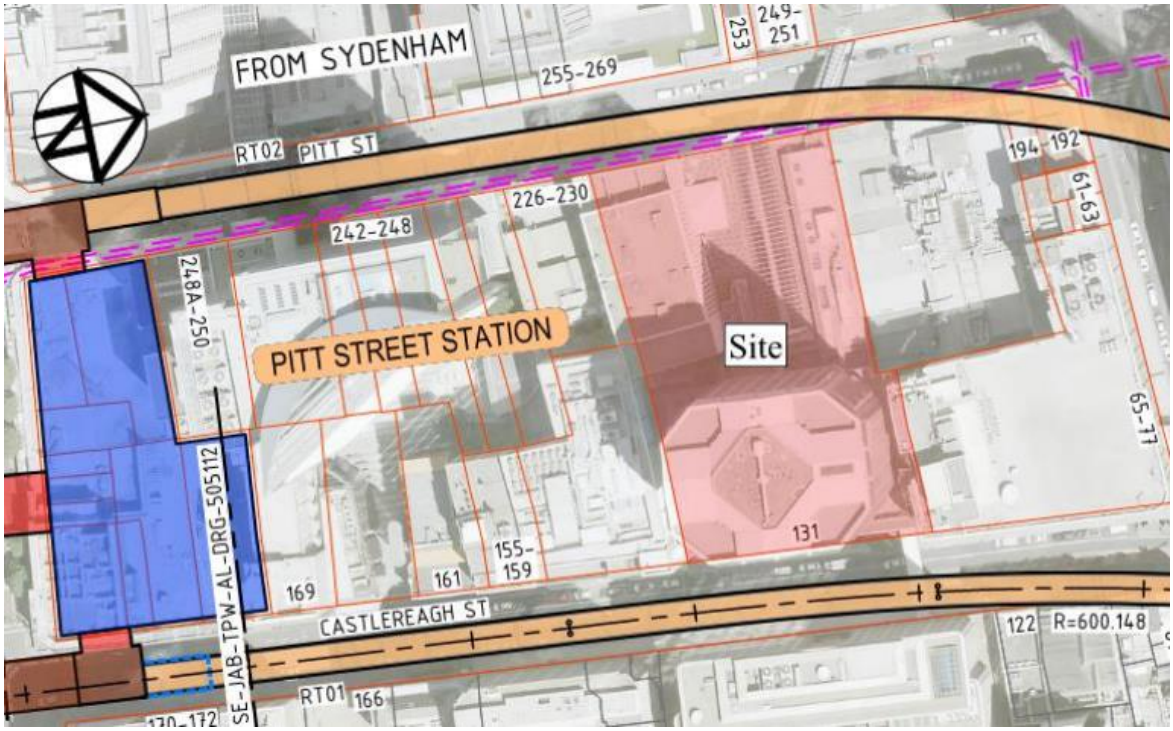
The existing basement construction at the excavated faces comprise concrete columns built in front of but not generally in contact with the cut face.

The concrete shoring wall is typically propped by the level ground floor and the level B1 floor. Along the Castlereagh Street boundary, the vehicle entry ramp partially extends beyond the site boundary. The ramp is on fill and the wall stem supporting Castlereagh Street cantilevers from the ramp base.

The site is bounded by both tunnels of the Sydney Metro – City & Southwest metro line to the east and the west, with tunnels running underneath Castlereagh and Pitt Street respectively. The newly constructed Gadigal station is located to the south of the site on the same block. The proximity to the tunnels is illustrated in **Figure 50.** The tunnels interact with the site at:

- The centres of the metro tunnels run at ~RL 2.7m towards the south ends of the site, diving down to RL 0.5m at the north of the site.
- The tunnels are roughly aligned with the lowest existing basement level (B5 at RL 3.6m).
- The tunnel bends towards the east causing the first reserve to overlap with the existing excavation at the northwestern boundary corner. The tunnel approaches within 1.5m from the western site boundary at its closest.
- On the east, the proposed development remains clear of the first reserve in plan with the tunnel at least 8.5m from the eastern site boundary.

Figure 50 Sydney Metro Tunnel Corridor Extent



Source: ARUP

Assessment

ARUP consider the proposed reference schemes and provide a high-level assessment of the impact on rail tunnels. In summary, ARUP note:

- There is no additional excavation proposed along the existing site boundaries or adjacent the rail tunnels.
- A new excavation is required to reach the base of the satellite core raft and column pad footings (at roughly RL 13.5m from existing RL 16.8m). The raft sits inboard of the southern and western boundaries and a buffer from the excavation will be kept to the neighbouring 226-230 Pitt Street Banking House and Pitt St avoiding any new retention. The satellite core raft and new footings will sit within the second reserve.
- A local excavation within the satellite core raft is required for two lift shafts to reach down to basement level 4 (RL 6.2m) providing lift access to the residential parking levels. The rock is expected to be of sufficient strength to not require additional retention. This will be located outside of the first reserve of both Metro tunnels however will encroach into the second reserves.
- The existing foundations are expected to undergo a cycle of unloading during demolition followed by reloading with increased loads under gravity to accommodate the new development.
- Overall, the new core excavation is minimal and well above the western Sydney Metro tunnel with no significant stress relief expected.
- The extent of new core excavation has been located inside the site boundaries to Pitt St and the heritage building at 226-230 Pitt St on the southern boundary.
- Existing retention along the site boundaries is to be retained without any additional retention proposed. The existing retention and excavation do not impact the performance of the Sydney Metro tunnels.
- The proposed foundation works will not encroach into the 1st and 2nd reserve of the Eastern Suburbs railway line.

Overall, the reference schemes have been designed such that any new excavations, foundations or retention structures are outside of the first reserves of the Sydney Metro Tunnels. Based on a preliminary empirical analysis, the impact of the structure will achieve a total of less than 10mm movement in the adjacent metro

rail infrastructure, which is to be expected given there are no new major excavations near the depth of the tunnels.

If required, a three-dimensional geotechnical analysis model of the rock substratum can be prepared at a future DA stage to assess the impact of the development on the metro rail tunnels.

8.4.6. Utility Services Assessment

Utility services assessments (one considering a commercial scheme and the other a mixed use scheme) prepared by ARUP accompanies the PP which provides a review of the availability, capacity and location of utility services infrastructure in the vicinity of the site. The report confirms that existing utility services can be augmented to meet the increased demand generated by the proposal.

Table 18 details the existing utility services infrastructure availability and augmentation required to accommodate the proposal.

Table 18 Utility services upgrade

Service	Existing supply	Augmentation required
Electricity	▪ Ausgrid connection ▪ 11kV and 400V cables including a substation	▪ Estimated demand approximately 13kVA ▪ Three substations required to Ausgrid standards
Communications	▪ A range of communication services including Telstra, Optus, NBN, TPG, Vocus, Uecomm, Verizon, AARNet, Nextgen, FibreconX.	▪ Augmentation required will depend on future tenant services requirements. ▪ The future development will require lead in cable routs for multiple service provides. This includes conduit provides to allow for servicing from multiple services providers.
Potable Water	▪ Sydney Water mains are available along Pitt Street and Castlereagh Street.	▪ It is anticipated that a new connection will be required to meet increased water demand. ▪ Two options to be taken forward to Sydney Water including access from Castlereagh Street or Pitt Street are detailed in the utility report which will be finalised at the detailed DA stage.
Sewer Service	▪ A Sydney Water 225VC Sewer main runs south to north along both Castlereagh Street and Pitt Street.	▪ It is anticipated that a new connection will be required to meet increased demand. ▪ Three options to be taken forward to Sydney Water are detailed in the utility report which will be finalised at the detailed DA stage.
Stormwater Drainage	▪ Existing stormwater drainage services are available along Pitt and Castlereagh Streets	▪ Stormwater is to be discharged to existing infrastructure.

Service	Existing supply	Augmentation required
		▪ 75 cubic metres of On-Site-Detention will be required to be further detailed at the detailed DA stage.

8.4.7. Heritage Impact

A Heritage Impact Statement (**HIS**), considering both potential development schemes, prepared by Urbis accompanies the PP. The HIS provides an assessment of the potential heritage impact of PP on the heritage listed items located in the vicinity of the subject site.

Methodology

The HIS has been prepared in accordance with the NSW Heritage Division guidelines 'Assessing Heritage Significance', and 'Statements of Heritage Impact'. The philosophy and process adopted is that guided by the Australia ICOMOS Burra Charter 1999 (revised 2013).

Assessment

The HIS concludes that the building envelope sought through this Planning Proposal is acceptable from a heritage perspective noting the following:

- The PP does not seek an amendment to Schedule 5 of the LEP. Therefore, all listed items identified in this report will continue to be protected by the provisions relevant to heritage set out in the LEP and DCP.
- The site does not meet the Heritage NSW criteria for assessing local heritage significance under any criterion.
- The subject property is located within the vicinity of a number of local and state heritage listed items. There are no physical works proposed at this stage, and no physical intervention to any heritage items in the vicinity.
- The proposed development envelope is located on a city block that contains existing substantial high rise development as well as low scale historic buildings. Sydney's Central Business District is characterised by situations where high rise towers are located adjacent to smaller historic buildings. These relationships, when handled appropriately, contribute to the diversity of the townscape.
- There is no proposed change to the maximum allowable height of building as part of this Planning Proposal. Therefore, there would be no impact on solar access to State listed Hyde Park or the enjoyment of the place as a result of the PP in comparison to the type of development currently allowable under the LEP – rather the PP will enable an improved outcome for Hyde Park through the removal of the existing Sun Access Plan breach.
- The additional FSR facilitated by this PP will primarily allow for the utilisation of the entire depth of the site for new mass (subject to future DA) up to the maximum height allowance as facilitated by the proposed envelope. The proposed increased density through the centre of the site would not be visually dominant when viewed from the public domain having regard for existing site constraints which limit views to the centre of the site.
- The proposed increase in density is in line with an uplift in density in the area and on the western side of Hyde Park generally, including the City Tattersalls, David Jones and Pitt Street North OSD developments which are located in the same city block.
- As the site does not meet the threshold of significance required for local heritage listing under any criterion, none of the elements comprised within the site are required to be retained from a heritage perspective.
- The heritage items in the vicinity will continue to be appreciated as historic structures of individual composition and street presence, surrounded by substantial high-rise development as is the current urban environment.

- Vicinity heritage items will continue to be read in their existing urban context and will continue to be able to be interpreted. Existing significant views towards heritage items in the vicinity will not be adversely affected by this Planning Proposal.
- The envelopes and reference schemes however already demonstrate an appropriate podium which relates to the establish street wall height in this part of the city and has a relationship with the scale of the heritage item adjacent (north).

In order to ensure that potential heritage impacts of the future redevelopment of the site on vicinity heritage items are avoided or mitigated, the HIS includes the following heritage principles:

- The articulation and fenestration of the podium form of the future building should respond to and complement the adjoining heritage items, in particular the City Tattersall's Club buildings and former Banking House on Pitt Street and the David Jones Market Street building at the corner of Market and Castlereagh Street.
- The future subject site podium form should provide a considered transition between the smaller scale City Tattersalls Club heritage to the north and the grand proportions of the former Banking House heritage item to the immediate south at 226-230 Pitt Street. A considered response should include reference to the varying floor to ceiling heights of the booked-ending heritage items, along with dominant vertical and horizontal detailing inherent in the traditional architecture of these buildings.
- Future development should adopt materiality and texture that adds a richness to the character of the Pitt Street and Castlereagh Street streetscapes. Materiality should not seek to replicate traditional detail, but provide a contemporary response to the immediate context while adding a new layer of design excellence to the CBD.

8.4.8. Waste Management

Preliminary operational waste management plans (one considering a commercial scheme and the other a mixed use scheme) prepared by Foresight Environmental accompanies the PP**.** The reports identify principles for waste management for the future redevelopment of the site.

The reports confirm that the future redevelopment of the site can adequately accommodate the indicative required equipment for the effective management of waste that it would generate. Further detailed design will accompany the future DA for the redevelopment of the site which will ensure that the spatial design requirements of the waste management area can be accommodated.

9. THE PLANNING PROPOSAL

This Planning Proposal has been prepared in accordance with section 3.33 of the EP&A Act and the DPHI LEP Guideline. Accordingly, the proposal is discussed in the following parts:

- Objectives and intended outcomes.
- Explanation of provisions.
- Justification of strategic and site-specific merit.
- Maps.
- Community consultation.
- Project timeline.

Discussion for each of the above parts is outlined in the following sections.

9.1. PART 1: OBJECTIVES AND INTENDED OUTCOMES

The intended outcome of this Planning Proposal is to amend the LEP in order to facilitate the redevelopment of the site with the potential to compromise a range of uses including commercial office, retail, place of public worship and residential land uses.

The intended outcomes of the requested amendments include:

- To satisfy State Government objectives to increase mixed-use floor space in Central Sydney and ensure the diversity and resilience of the Central Sydney market.
- Align with the City Plan 2041: Local Strategic Planning Statement to facilitate additional floor space capacity in Central Sydney while also delivering improved public domain outcomes.
- To deliver significant public domain improvements including a through site link between Pitt and Castlereagh Streets and enhanced pedestrian amenity and activation at the ground plane.
- To rectify the existing SAP breach to ensure that Hyde Park achieves unobstructed sunlight access between 10am and 2pm all year.
- To deliver a major regeneration project that will deliver an exemplary sustainability outcome and reinforce the Sydney CBD's global status as a leader in ESD policy and implementation.
- To improve the current public domain outcome along Castlereagh Street through removal of the existing parallel basement parking ramp which disrupts the footpath
- To remove the sky bridges over Pitt and Castlereagh Street which result in a poor public domain outcome.
- Clarify the existing car parking arrangements.
- Ultimately, this will enable the achievement of a range of both State and local strategic planning objectives, whilst ensuring a site-specific and sensitive response as informed by the surrounding land use and built form character.

9.2. PART 2: EXPLANATION OF THE PROVISIONS

The objectives and intended outcomes of the Planning Proposal will be achieved by implementing a site-specific provision into Part 6, Division 5 of the Sydney LEP 2012 which will allow a maximum allowable FSR on the site of 19.67:1 which can achieve an FSR of 21.85:1 if a competitive design process has been held and the building demonstrates design excellence through a 10% FSR bonus.

An amendment is also proposed to Schedule 6C of the Sydney LEP 2012, which reflects the current adopted Affordable Housing Program rate of 13% which is applied to residential uplift floor space where this is achieved via a Planning Proposal.

The drafting of Schedule 6C:

- Is intended to apply to residential floor space only and limited to the 'uplift' residential floorspace achieved through the planning proposal.
- It is not intended to apply to commercial GFA which would be levied under the provisions of Clause 7.13 of the SLEP 2012 in the usual way.
- The calculation of 'uplift' floor space has been proposed in pre-consultation with the City of Sydney and applies a methodology, based on 'gross floor area' of:
    - Defining the existing eligible maximum floor space of the Mixed Use Scheme under the SLEP2012.
    - Determining the difference between the proposed total GFA of the Mixed Use Scheme and the maximum eligible FSR.
    - Proportioning the floor space as per the Mixed Use Scheme (i.e. 85% commercial/non-residential and 15% residential).
    - Multiplying the total uplift GFA sought under the Planning Proposal by 15% to determine the residential floor space uplift.
    - Based on this approach, 40.4% of all residential floor space would be deemed 'uplift' floorspace and therefore subject to the rate of 13% under Schedule 6C, with the remainder subject to the normal contribution of 3% under clause 7.13 of the SLEP2012.

While complex, the proposed methodology recognises that residential floor space is already permitted within the zone and therefore, it is the exercise of appropriately proportioning the floorspace uplift as it is to be applied to residential GFA which is the key calculation.

In respect to car parking provision, this is addressed by including an objective to reduce the existing car parking provision on site (currently 270 spaces), to a maximum of 220 spaces in the event of the commercial development scheme and 185 spaces if the development scheme includes residential. It is proposed to retain clause 7.5 of the SLEP which sets an upper limit provision for the provision of parking associated with residential use.

The proposed wording of the provisions subject to legal drafting by the Parliamentary Counsel Office is outlined below.

9.2.1. Site Specific Provision

Division 5 Site Specific Provisions

6.## 133-145 Castlereagh Street, Sydney

(1) The objective of this clause is to encourage:

(a) a diversity of land uses which may include residential accommodation, and

(b) the provision retail activation and pedestrian connections.

(c) to reduce where practicable, the total amount of existing parking on site as part of site redevelopment.

(2) This clause applies to 133-145 Castlereagh Street, Sydney, being Lot 10 DP 828419.

(3) Despite any other provision of this Plan, a building on land to which this clause applies may have a maximum floor space ratio of 21.85:1 which comprises:

i. 20.67:1, located in the above ground portion of the building

ii. 1.18:1, located in the below ground portion of the building

(5) Development consent must not be granted under this clause unless the consent authority is satisfied that the development will–

(a) include a pedestrian through-site link connecting Castlereagh Street and Pitt Street, and

(b) include retail premises fronting the through-site link, and

(c) remove the vehicle entry ramp to the basement and realigns the footpath adjacent to Castlereagh Street, and

(d) reduce the existing on-site parking provision to a maximum of 220 spaces (for development not including residential accommodation) and a maximum of 185 spaces (for development incorporating residential accommodation).

(e) not be used for the purposes of a commercial car park, and

(f) comprise residential land use not exceeding 15% of the total gross floor area.

(6) The following do not apply to development to which this clause applies —

(a) clause 6.3 and Subdivision 2 of Division 1 of Part 6,

(b) clause 6.21D(3), and

(c) Division 1 of Part 7 (but excluding clause 7.5 which continues to apply).

9.2.2. Schedule 6C

Schedule 6C Contribution requirement for certain development on Planning Proposal Land

Planning Proposal Land	***Contribution Requirement***
133-145 Castlereagh Street, Sydney, being Lot 10 DP 828419	*If the development comprises residential floor space:* *The total amount of—* *(a) for 59.6% of the gross floor area of all buildings used for residential purposes —the contribution applying to the development under clause 7.13, and* *(b) for 40.4% of the gross floor area of all buildings used for residential purposes —13% of that floor area*

9.2.3. Site Specific DCP

In addition, the Planning Proposal is accompanied by the preparation of a draft site-specific Development Control Plan (see **Appendix D**) that will be further detailed and finalised as the Planning Proposal progresses through the planning process. The draft site-specific DCP details objectives and site specific provisions which will apply to the site despite other provisions of the DCP.

Provisions detailed in the draft site-specific DCP include:

- Minimum building setback and maximum building envelope controls (for each land use option) to establish the maximum extent of the built form of the future building.
- Establish the location, size, and operation of an activated east west through-site link with daylight access provided by a central atrium.
- Establish a vehicular access location at the south eastern corner of the site from Castlereagh Street and removal of the existing parallel ramp.
- Removal of the existing sky bridges above Pitt Street and Castlereagh Street as part of any comprehensive redevelopment of the site.
- Establish sustainability criteria to be achieved by the future building.
- Ensure the redevelopment of the site responds appropriately to the adjoining heritage items.
- Ensure the redevelopment of the site does not overshadow Hyde Park in accordance with the SAP provisions.

9.3. PART 3: JUSTIFICATION

The DPHI LEP Guidelines (August 2023) identifies that the Minister (or delegate) must be satisfied that the proposal has strategic and site-specific merit and that identified potential impacts can be readily addressed during the subsequent LEP making stages.

Consistent with the assessment criteria outlined in the LEP Guideline, **Table 19** outlines an assessment against the assessment criteria for strategic and site-specific merit.

Table 19 Strategic and site-specific merit assessment

Assessment Criteria	**Response**
Strategic Merit - *Does the proposal:*	
▪ *Give effect to the relevant regional plan outside of the Greater Sydney Region, the relevant district plan within the Greater Sydney Region, and/or corridor/precinct plans applying to the site.*	**Section 9.3.2** outlines how the Planning Proposal gives effect to the objectives of the following regional and district plans: ▪ Greater Sydney Region Plan – A Metropolis of Three Cities ▪ Eastern District Plan
▪ *Demonstrate consistency with the relevant LSPS or strategy that has been endorsed by the Department or required as part of a regional or district plan*	**Section 9.3.2** outlines consistency with the LSPS, Sustainable Sydney and the CSPS.
▪ *Respond to a change in circumstances that has not been recognised by the existing planning framework*	The LEP Guidelines identifies factors that contribute to a change in circumstances includes a "*Response to key Government priorities – Premier's Priorities, climate change, or a shift in government policy (e.g. NSW Government's Net Zero Plan*)". The proposal is able to significantly contribute to a shift in Governmental priority that has focused on increasing residential housing supply in NSW. Recent policy updates from all levels of Government have identified a "housing emergency". The proposal will contribute to the identified target for NSW of 320,000 new homes within the next five-year period.
Site-specific merit - Does the proposal give regard and assess impacts to:	
▪ *the natural environment on the site to which the proposal relates and other affected land*	**Section 9.3.3** provides an assessment of the suitability of the natural environment.
▪ *existing uses, approved uses, and likely future uses of land in the vicinity of the land to which the proposal relates*	The proposal creates the potential to retain existing Wesley facilities, commercial use in the podium and lower tower and incorporates the potential for residential uses in the upper tower.
▪ *services and infrastructure that are or will be available to meet the demands arising from*	A utility services assessment prepared by ARUP accompanies the Planning Proposal and **Section**

Assessment Criteria	Response
the proposal and any proposed financial arrangements for infrastructure provision	**8.4.6** provides an assessment of necessary services and infrastructure.

9.3.1. Section A – Need for the Planning Proposal

Q1 - Is the Planning Proposal a result of any strategic study or report?

Yes, the Planning Proposal is a response to and is consistent with the CSPS and the accompanying Guideline. Discussion of the CSPS and the Guideline is outlined in **Section 5.1** and an assessment of the consistency of the proposal with the strategic planning framework is provided in **Section 9.3.2.**

In addition to the objectives of these strategies, this Planning Proposal has been informed by a comprehensive evaluation of the site's physical and strategic attributes. This built form analysis included the preparation of indicative design concepts and urban design analysis to inform an appropriate bulk and massing scenario in keeping with the Hyde Park SAP which is responsive to the metropolitan context, but not unreasonable with regards to impacts on surrounding amenity-sensitive land uses.

The analysis undertaken demonstrates that the site's characteristics make it a unique, highly strategic and prominent site that can realise the objectives and intended outcomes of the applicable strategic planning policies, whilst also suitably accommodating the proposed density as sought within this Planning Proposal request.

Q2 - Is the Planning Proposal the best means of achieving the objectives or intended outcomes is there a better way?

Yes, the proposed amendments to the LEP including the proposed site-specific provision are required to increase the floor space development standard on the site and facilitate the redevelopment of the site. The current development standards under the LEP do not enable the proposed concept reference schemes or full potential of the site.

A Planning Proposal will achieve the anticipated built form and development outcomes outlined in **Section 4** of this report.

9.3.2. Section B – Relationship to Strategic Planning Framework

Q3 – Is the Planning Proposal consistent with the objectives and actions of the applicable regional, sub-regional or district plan or strategy (including any exhibited draft plans or strategies)?

Yes, the Planning Proposal is consistent with the objectives and actions of the following regional and district strategic policies.

Greater Sydney Regional Plan – A Metropolis of Three Cities

The *Greater Sydney Region Plan – A Metropolis of Three Cities* (GSRP 2018) was released by the Greater Sydney Commission in March 2018 and provides guidance for land use planning into the future for the three cities of Greater Sydney. These include the Western Parkland City; the Central River City; and the Eastern Harbour City. The site is located on the Eastern Harbour City.

The Harbour CBD (which includes Sydney City & North Sydney CBDs) is planned to be economically strengthened with focus on innovation and global competitiveness. Key infrastructure projects include the CBD and South East Light Rail, expected to be completed in 2020, and the Sydney Metro City and Southwest, expected to be completed in 2024. An assessment of the proposal against relevant planning priorities in the GSRP 2018 is provided in the Table below.

Table 20 Consistency with the Greater Sydney Regional Plan

Provision	Response
Direction 1 - A city supported by infrastructure	The proposed increase in density on site is considered highly appropriate given its proximity to rail (heavy and light rail), bus and metro rail services, which positively contributes to this objective by placing density in a highly convenient location that will encourage use of existing and new transport infrastructure. Furthermore, the proposed potential mix of commercial, retail, Wesley and residential land uses provides a diverse land use, which will ensure the public transport infrastructure is further optimised. Delivering density in the right location, such as the site, will help to drive better travel behaviour in future residents and workers, encouraging increased reliance on public transport.
Direction 3 - A city for people	The PP will support the strategic direction of Central Sydney and promote a strong “sense of place” that will directly influence community values and culture for the community. The PP provides the option for Wesley to remain on site and continue this service on the site. The Planning Proposal is supported by a public art strategy and described in **Section 7.5.4.4**. Opportunities to integrate public art will be further detailed at DA stage.
Direction 4 - Housing the city	This PP seeks to introduce the potential for residential development on this strategically located site. 96 new dwellings can be achieved under the mixed use reference scheme which will contribute to the housing targets. Whilst new housing targets are anticipated in the new year through updated metropolitan and District Plans, as evidenced in the Housing Accord, the need to deliver housing in NSW is more acutely critical compared with the time of preparation of this Plan.
Direction 5 - A city of great places	The PP seeks to establish an east west through site link at the ground floor level which to the benefit of pedestrians. The site is not identified as containing a heritage item or being located within a heritage conservation area. Notwithstanding this, the site is located within proximity to a number of items with heritage significance. A statement of heritage impact accompanies the Planning Proposal which confirms that the building envelopes sought through this planning proposal is acceptable from a heritage perspective.
Direction 6 - A well-connected city	The PP will unlock the ability for workers and residents to access key strategic centres and employment hubs within 30 minutes. The proximity of the site to existing and planned transport options will assist in promoting walkable cities as well as be attractive to commercial tenants. The provision of mixed-use development incorporating residential and office uses, is important in providing jobs close to home, and optimising the employment self-containment levels in the LGA.
Direction 7 - Jobs and skills for the city	The PP is entirely consistent with this direction in that it will result in commercial office space and retail tenancies within close proximity to public transport nodes. This will assist the delivery of a 30-minute city in

Provision	Response
	that future occupants of the site will benefit from accessible public transport. The PP will provide commercial office space with large floorplates with the flexibility to attract a range of future tenants. This will ultimately contribute to growth in investment in the Harbour CBD.
Direction 8 - A city in its Landscape	Future redevelopment of the site will improve the current solar access to Hyde Park due to an existing breach of the Piccadilly Tower above the SAP. This will improve the amenity of the space and rectify the non-compliance. The site through link will provides opportunity for retail alfresco dining and flexible outdoor spaces.
Direction 9 - An efficient city	The redevelopment of the site will provide the opportunity to deliver an exemplary sustainable development through upcycling of the existing structure as well as targeting a high level of environmental performance in future development. The retention of the structure will enable a significant reduction in embodied carbon, with a 60% reduction in carbon in comparison to a full demolition and re-build proposition.

Eastern City District Plan

The Eastern City District Plan was released by the Greater Sydney Commission in March 2018. The site is located within the Eastern Harbour CBD which is the metropolitan centre of the Eastern City District. The Eastern Harbour CBD is Australia's global gateway and financial capital.

The District Plan highlights the tension between residential and commercial office uses within the Sydney CBD and highlights the importance of retaining a strong commercial core in order to accommodate the 45,000 – 80,000 future jobs forecast for the District. Policy settings are designed to support innovative and creative industries, aligning growth with infrastructure, and increasing the supply of A-grade commercial office space. An assessment of the Planning Proposal's consistency with relevant key planning priorities in the Eastern City District Plan is provided in **Table 21.**

Table 21 Consistency with Eastern City District Plan

Planning Priority	Comment
E1 – Planning for a city supported by infrastructure	The PP demonstrates consistency with this objective in that it will facilitate mixed-use floor space serviced by several public transport modes including rail, light rail, bus, and metro. The future development of the site will also be subject to development contributions.
E4 – Fostering healthy, creative, culturally rich and socially connected communities	The PP creates the option to retain and refurbish the Wesley facilities (if sought by the Church) which supports the cultural fabric of Central Sydney and provision of social and community services.
E5 – Providing housing supply, choice and affordability with access to jobs and services	The PP has the potential to facilitate the delivery of 96 dwellings with excellent access to public transport and job markets. The Proposal can assist in meeting the housing targets identified for District and will assist in achieving greater housing supply.
E7 – Growing a stronger and more competitive Harbour CBD	The PP will result in the delivery of additional high-quality office floor space on the site. This will assist in the growth of a stronger and more competitive Harbour CBD.

Planning Priority	Comment
E10 - Delivering integrated and land use and transport planning for a 30-minute city	The PP is entirely consistent with this direction in that it will result in commercial office space and retail tenancies within close proximity to public transport nodes. This will assist the delivery of a 30-minute city in that future occupants of the site will benefit from accessible public transport.
E11 – Growing investment, business opportunities and jobs in strategic centres	The PP will provide commercial office space with large floorplates with the flexibility to attract a range of future tenants. Contemporary and flexible employment space is a focus for the proposed commercial space, to promote diversity in industries and provide variety of job opportunities. This will ultimately contribute to growth in investment in the Harbour CBD.
E13 – Supporting growth and targeted industry sectors	The PP will facilitate commercial office space which will be able to ultimately accommodate a wide range of tenants.
E19 – Reducing carbon emissions and managing energy water and waste efficiency	The PP will facilitate a future building capable achieving a high level of environmental performance (refer to **Urban design report, ESD report** and **waste** reports and **Section 8.4.2 and 8.4.8**), in addition to significant savings un carbon through up-cycling of the schemes.

Q4 – Is the Planning Proposal consistent with a Council's local strategy or other local strategic plan?

Sustainable Sydney

Sustainable Sydney 2030 is a long-term plan prepared by the Council to achieve a green, global, and connected city. It contains ten strategic directions, of which the following are relevant and will be delivered by the Planning Proposal:

Table 22 Consistency with Sustainable Sydney 2030

Direction	Comment
A globally competitive and innovative city	The PP will facilitate the construction of modern commercial floor space in Central Sydney. The reference design and building envelope appropriately responds to the site constraints resulting in a high-quality urban design outcome which will contribute to Sydney's global status and attractiveness.
A leading environmental performer	The PP will facilitate a future building which capable achieving a high level of environmental performance. (refer **to Urban Design Report** and **ESD statement** and **Section 8.4.2).**
Integrated transport for a connected city	The PP will facilitate increased employment floor space in a location that benefits from excellent access to public transport nodes.
A city for walking and cycling	The site is highly accessible via footpaths along Castlereagh and Pitt Street and the Council cycle path network. A cycle path is planned along Castlereagh Street as part of the regional cycle network. The future

Direction	Comment
	building will provide end of trip facilities which will encourage walking and cycling to the site.
A lively and engaging city centre	The PP will achieve the objectives of this direction in that it facilitates active frontages to Pitt and Castlereagh Streets and an east west through site link.
A cultural and creative city	Public art will be provided within the future development of the site as demonstrated in the public art strategy submitted with the PP**.**
Sustainable development, renewal, and design	The PP represents a sustainable development in that it will facilitate employment floor space that is capable of meeting sustainability requirements in an accessible location with access to public transport nodes.

City Plan: Local Strategic Planning Statement

City Plan 2036 is the Local Strategic Planning Statement (**LSPS**) for the Council and links the state and local strategic plans with the planning controls to guide future development and the Local Environmental Plan review. Notably, the LSPS stipulates that the LGA will accommodate 200,000 additional jobs to 2036.

The City Plan sets 13 priorities to achieve the City's Green, Global, Connected vision and guide future changes to the City's planning controls. The PP is consistent with the LSPS as demonstrated in the **Table 23.**

Table 23 Consistency with the LSPS

Priority	Comment
Movement for walkable neighbourhoods and a connected city	The PP will facilitate employment floor space in a highly walkable location in Central Sydney and will facilitate a through site link.
Creating great places	Future development of the site will improve the current solar access to Hyde Park. In addition, the future development will provide a northerly aligned through-site link from Pitt Street to Castlereagh Street to the benefit of pedestrians. The mixture of land use also contribute to a diverse and vibrant place.
Growing a stronger, more competitive Central Sydney	The PP will result in increased modern employment floor space in Central Sydney.
Creating better buildings and places to reduce emissions and waste and use water efficiency	The PP will facilitate a future building which capable achieving a high level of environmental performance (refer Urban Design Report and ESD statement with the PP and Section 8.4.2), and will be a leader in sustainable development through retention and upcycling of the existing structure.

Central Sydney Planning Strategy

The CSPS is a 20-year growth strategy that builds upon the strategy of Sustainable Sydney 2030 and revises planning controls for Central Sydney. The Strategy outlines 10 key moves. The PP is consistent with the key moves of the CSPS as demonstrated in **Table 24.**

Table 24 Consistency with CSPS

Key Move	Comment
Prioritise employment growth and increase capacity	The PP is entirely consistent with this key move in that it will increase premium office space and ancillary retail tenancies within Central Sydney which will accommodate for projected jobs growth. Whilst the mixed use scheme introduces the potential for residential land use of the site, this is consistent with the City's Guideline and will improve the diversity and resilience of the site redevelopment. Notably, the quantum of residential is a maximum of 15% (and complies with the current LEP) and the majority of the site redevelopment will be dedicated to employment generating uses.
Ensure development responds to context	The PP seeks to establish a building envelope options through a site specific DCP provision which will accommodate a range of uses within a mixed-use CBD locality. A detailed assessment of environmental impacts of the proposal is provided at **Section 8** of this report.
Ensure infrastructure keeps pace with growth	The PP demonstrates consistency with this objective in that it will facilitate commercial floor space serviced by several public transport modes including rail, light rail, bus, and metro. The future development of the site will also be subject to development contributions.
Move towards a more sustainable city	The PP will facilitate a future building which capable achieving a high level of environmental performance (refer to Urbis Design report and also **Section 8.4.2**), and will be a leader in sustainable development through retention and upcycling of the existing structure. Thie key move also "*includes actions to investigate provisions that reward the retention, refurbishment and upgrade of older office buildings*", which the reference schemes are directly consistent with. As discussed in earlier sections, Piccadilly's upcycling proposition considers its whole of life carbon which will be significant in Sydney and enable a 60% reduction in carbon in comparison to a full demolition and re-build proposition.
Protect, enhance, and expand Central Sydney's heritage, public places and spaces	The PP will improve the current sun access provision to Hyde Park through the removal of existing floor space which breaches the SAP. The proposed envelopes and reference schemes is consistent Hyde Park West sun SAP.
Move people more easily	The site is highly accessible to public transport, footpaths, and cycling links. In addition, the future building will provide end of trip facilities which will encourage walking and cycling to the site. A through site link is also proposed, facilitating an improved mid-block pedestrian link.
Reaffirm commitment to design excellence	The future detailed design development application for the site will be subject to a design competition in accordance with the draft design excellence strategy submitted with the PP.

Guidelines for Site Specific Planning Proposals in Central Sydney

The CSPS is accompanying by the Guidelines for Site Specific Planning Proposals in Central Sydney (the Guideline). The Guideline details the planning pathway to access additional height and density through site specific planning proposals in Central Sydney.

Consistent with the Central Sydney Planning Strategy (the Strategy), the Guideline **(typically)** limits these growth opportunities to employment floor space and promotes the efficient use of land.

The Guideline outlines matters for consideration in determining if a Request has strategic merit.

Stated purposes of the Guideline are:

- *provide opportunities for additional floor space on appropriate sites that serve the workforce, visitors and wider community;*
- *provide opportunities on **Strategic Opportunity Sites** for additional height where significant public benefit can be demonstrated;*
- *ensure planning proposals align with the aims, objectives and actions of the Central Sydney Planning Strategy and have planning and architectural merit;*
- *provide a transparent and consistent approach to the evaluation of planning proposals*

The site is nominated as a "Solar Access Opportunity Site" under the Guideline. The Guideline for Site Specific Planning Proposals in Central Sydney states:

> *A Strategic Opportunity Site is different to other sites because it is capable of delivering, or facilitating the delivery of, significant public benefits that otherwise would not have been delivered.*
>
> *To qualify as a Strategic Opportunity Site the Request must demonstrate how, and by how much existing overshadowing is being reduced to a protected space under Sydney LEP. The reduction in overshadowing is to ensure:*
>
> *• compliance with Sydney LEPs Sun Access Protection controls, and*
>
> *• remove an existing significant breach of more than 15 metres in height*.

It further allows for the opportunity to explore residential land use as it states:

> "*This Guideline applies to Strategic Opportunity Sites in full except for the restriction on use…For Solar Access Opportunity Sites proposed new buildings (or altered buildings) that rely on increased maximum heights and/or FSR controls may be any use permitted by Sydney LEP including residential accommodation and serviced apartments*".

Q5 – Is the Planning Proposal consistent with the applicable State Environmental Planning Policies?

The Planning Proposal is consistent with the following State Environmental Planning Policies (**SEPPs**) as identified in **Table 25.**

Table 25 Assessment of the Planning Proposal against relevant SEPPs

SEPP	Requirement	Comment
State Environmental Planning Policy (Transport and Infrastructure) 2021 (**T&I SEPP**)	Section 2.101 Development within or adjacent to interim rail corridor The western portion of the site is identified within the CBD Metro (Zone B – tunnel) mapping under the T&I SEPP.	Any future development application will need to consider the provision of the T&I SEPP. Concurrence of the Sydney Metro Authority will be required for the future detailed development application.

SEPP	Requirement	Comment
	Section 2.120 Impact of road noise or vibration on non-road development	The section applies to development of residential accommodation and a place of public worship that is on land in or adjacent to the road corridor for a freeway, a tollway or a transitway or any other road with an annual average daily traffic volume of more than 20,000 vehicles. The section also outlines maximum noise levels (LAeq) for residential development. The Acoustic Report prepared by ARUP provides a high-level assessment of the acoustic amenity of the reference schemes, with further assessment to be undertaken at the DA stage. This is discussed further in **Section 8.2.7 and 8.3.8**.
	Section 2.122 Traffic Generating Development	Concurrence of Transport for NSW will be required for the future detailed development application as over 10,000sqm of commercial floor space is proposed.
State Environmental Planning Policy (Resilience and Hazards) 2021 (**R&H SEPP**)	Section 4.6 Contamination and remediation to be considered in determining development application Requires a consent authority to consider whether land is contaminated and if the land is suitable for the carrying out of any development on land.	Any future development application will need to consider the provision of the R&H SEPP.
State Environmental Planning Policy (Housing) 2021 (**Housing SEPP**)	Chapter 4 outlines design requirements related to mixed-use development. Specifically, section 147 requires the consent authority to consider the Apartment Design Guide in the determination of an application.	Any future application for residential use will outline compliance with the ADG and the design requirements of the Housing SEPP.
State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 (**Codes SEPP**)	Part 2 Exempt development codes and Part 4A General development codes	The PP does not contradict or hinder the application of the Codes SEPP to future application to development on the site.
State Environmental Planning Policy	Chapter 2 Standards for residential development—BASIX and Chapter 3	Any future application will need to consider the sustainability provisions

SEPP	Requirement	Comment
(Sustainable Buildings) 2022 (**SB SEPP**)	Standards for non-residential development	applicable to residential and non-residential development in the SB SEPP. The reference mixed use scheme has been prepared in accordance with the SB SEPP and will seek to exceed the minimum sustainability provisions to achieve an exemplary development outcome.
State Environmental Planning Policy (Biodiversity and Conservation) 2021	Chapter 6 Water catchments	The PP does not contradict or hinder the application of the planning principles for the Sydney Harbour Catchment.
State Environmental Planning Policy (Planning Systems) 2021 (**PS SEPP**)	Chapter 2 State and regional development	The PP does not contradict or hinder the application of the PS SEPP to future application to development on the site.
State Environmental Planning Policy (Industry and Employment) 2021 (**I&E SEPP**)	Chapter 3 Advertising and signage	The PP does not contradict or hinder the application of the I&E SEPP to future application to development on the site.

The following SEPPs are not applicable to this Planning Proposal:

- State Environmental Planning Policy (Resources and Energy) 2021
- State Environmental Planning Policy (Primary Production) 2021
- State Environmental Planning Policy (Precincts—Western Parkland City) 2021
- State Environmental Planning Policy (Precincts—Regional) 2021
- State Environmental Planning Policy (Precincts—Central River City) 2021
- State Environmental Planning Policy (Precincts—Eastern Harbour City) *2021*

Q6 - Is the Planning Proposal consistent with applicable Ministerial Directions (s. 9.1 directions)?

The PP is consistent with the following applicable section 9.1 Ministerial Directions as identified in **Table 26.**

Table 26 Consistency with Section 9.1 Ministerial Directions

Direction	Response
1.1 Implementation of Regional Plans	The proposal is consistent with the land use strategy, goals, directions and actions contained within the GSRP and District Plan as discussed in **Section 9.3.2.1.**
1.3 Approval and Referral Requirements	This direction aims to ensure that LEP provisions encourage the efficient and appropriate assessment of development. The relevant requirements of this direction have been considered in the preparation of this PP and proposed LEP amendments.
1.4 Site Specific Provisions	The objectives and intended outcomes of the PP will be facilitated by a site-specific provision enabling FSR on the site which is greater than otherwise allowed by the LEP. The Sydney LEP 2012 is somewhat unique in that it includes site specific provisions within the LEP to vary the development standards applying to a site rather than amending the relevant map, predominantly in Central Sydney. Part 6, Division 5 of the LEP includes 28 site specific controls which vary development standards, consistent with that sought by the Planning Proposal. In the circumstances of the case, it is appropriate and necessary to implement site specific development controls to the site.
1.4A Exclusion of Development Standards from Variation	Not proposed as some flexibility is appropriate in the circumstances, noting limitations of sun access plane to built form.
3.2 Heritage Conservation	The site is not identified as containing a heritage item or being located within a heritage conservation area. Notwithstanding this, the site is located within close proximity to a number of items with heritage significance. A statement of heritage impact accompanies the PP which confirms that the building envelope sought through this planning proposal is acceptable from a heritage perspective.
4.1 Flooding	A preliminary flood impact assessment prepared by ARUP accompanies the PP. Measures are identified to be incorporated into the detailed design of the site at a future DA stage.
4.4 Remediation of Contaminated Land	This site is currently used for commercial purposes. The future outcome could be commercial or mixed-use of the site (which will introduce residential uses into the site). Excavation is proposed to lower the existing basement level in the southwestern corner of the site. The site's suitability will be demonstrated as part of a future detailed development application for the site.
4.5 Acid Sulfate Soils	The site is identified in the LEP as containing class 5 acid sulfate soils. Pursuant to the Sydney LEP 2012 consent is required for works within 500 metres of adjacent Class 1, 2, 3 or 4 land that is below 5 metres Australian Height Datum and by which the water-table is likely to be

Direction	Response
	lowered below 1 metre Australian Height Datum on adjacent Class 1, 2, 3 or 4 land. The LEP map identifies class 2 acid sulfate soils located at Sussex Street approximately 400m west of the site. Notwithstanding this, excavation required for the south-western corner of the site is only expected to reach depths of approximately RL 14m. It is, therefore, not expected that an acid sulfate soils management plan will be required to accompany the detailed DA for redevelopment of the site.
5.1 Integrating Land Use and Transport	The PP demonstrates consistency with this objective in that it will facilitate either commercial or mixed-use floor space serviced by several public transport modes. Specifically, the site: ▪ Exhibits excellent access to public transport, being within walking distance of the St James and Town Hall train stations, as well as Martin Place and Gadigal Metro Stations. The site is also proximate to existing bus services and the CBD and South East light rail. ▪ The increased density on the site supports the patronage of the Metro station and accords with the key direction from the State government, which seeks to co-locate increased densities within the walker catchment of public transport nodes. ▪ The provision of increased housing supply within Central Sydney reduces the need for car dependency and encourages a walkable neighbourhood.
5.3 Development Near Regulated Airports and Defence Airfields	The Planning Proposal seeks consent for building envelopes which is located above RL156 which is the Obstacle Limitation Surface (OLS) airspace surrounding the Sydney Kingsford Smith Airport (Sydney Airport). Notwithstanding this, the PP does not seek an increase in the maximum height of building control applicable to the site. If necessary, consultation with the operator of Sydney Airport will be undertaken as condition of Gateway Determination.
6.1 Residential Zones	The PP is consistent with the direction as: ▪ The mixed use reference scheme contributes to an increase in housing types to meet the existing needs of the community. The reference scheme includes 1, 2 and 3-bedroom apartments. ▪ The proposal makes an efficient use of existing infrastructure and services through delivery of a mixed-use scheme on a site that is already serviced. ▪ The site is located within an established urban centre and will not result in development on the urban fringe. ▪ The mixed use reference scheme proposes a high-quality design that achieves key provisions of the ADG.

Direction	Response
7.1 Employment Zones	The site is located in the SP5 zone and the PP does not seek to change the existing zoning. Consistent with the direction the proposal will deliver contemporary commercial and retail uses on the ground floor, podium and upper tower levels that will generate employment. The proposal will optimise a development outcome that facilitates retail and commercial uses by amending built form controls.

The following S9.1 directions are not applicable to this PP:

- 1.2 Development of Aboriginal Land Council Land
- 1.5 Parramatta Road Corridor Urban Transformation Strategy – 1.22 Implementation of Cherrybrook Station Place Strategy
- 3.1 Conservation Zones
- 3.3 Sydney Drinking Water Catchments – 3.10 Water Catchment Protection
- 4.2 Coastal Management – 4.3 Planning for Bushfire Protection
- 4.6 Mine Subsidence and Unstable Land
- 5.2 Reserving Land for Public Purposes
- 5.4 Shooting Ranges – 5.5 High Pressure Dangerous Goods Pipeline
- 6.2 Caravan Parks and Manufactured Home Estates
- 7.2 Reduction in non-hosted short-term rental accommodation period – 7.3 Commercial and retail development
- 8.1 Mining, Petroleum Production and Extractive Industries
- 9.1 Rural Zones – 9.4 Farmland of State and Regional Significance on the NSW Far North Coast

9.3.3. Section C – Environmental, Social and Economic Impact

Q7 – Is there any likelihood that critical habitat, or threatened species populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

No, the site is situated within an urban context and was historically used for commercial purposes. The site is highly modified and therefore it is expected that the Planning Proposal will not affect any critical habitat or threatened species, populations, or ecological communities.

Q8 – Are there any other likely environmental effects as a result of the Planning Proposal and how they are proposed to be managed?

The Planning Proposal is not expected to give rise to any unreasonable environmental impacts. Where potential environmental impacts have been identified, mitigation and management measures have been provided.

Section 10 provides an assessment of the potential environmental impacts and management measures.

Q9 – Has the Planning Proposal adequately addressed any social and economic effects?

The intended outcomes of the PP will have an overwhelmingly positive social and economic impact on the local community. The Urban Design Report and Concept Reference Schemes (**Appendix A**) demonstrates

how the site can accommodate the increased density to increase the employment generating capacity of the site that is a significant improvement to the existing site condition.

Specifically, the PP will have the following positive social and economic effects on the immediate and surrounding locality:

- The proposal will generate jobs both during construction and operation of the proposed development which will have flow on effects to the local economy. Integrating residential land uses into the site as an option will ensure the financial viability to support the significant investment in the site redevelopment.
- The proposal aligns with the City Plan 2041 LSPS and the CSPS to facilitate additional commercial floor space capacity in Central Sydney while also delivering improved public domain outcomes.
- The proposal will deliver significant public domain improvements including a through site link between Pitt and Castlereagh Streets and enhances pedestrian amenity and activation at the ground plane.
- The proposal will rectify the existing sun access plane breach to ensure that Hyde Park achieves unobstructed sunlight access between 10am and 2pm all year.
- The proposal will improve the current public domain outcome along Castlereagh Street through removal of the existing parallel basement parking ramp which disrupts the footpath
- The proposal will remove the sky bridges over Pitt and Castlereagh Street which result in a poor public domain outcome.
- The proposal will result in the rationalisation and improvement of car parking and vehicular access arrangements to the site.
- The new building will achieve a high level of environmental performance and will be a leader in sustainable development through the upcycling of the existing structure, resulting in a significant reduction in embodied carbon.
- The future development consent will require payment of monetary contributions toward the cost of public amenities and public services, which the council has determined is required to meet the demand created by the redevelopment.

9.3.4. Section D – State and Commonwealth Interests

Q10 – Is there adequate public infrastructure for the Planning Proposal?

The site is located within a CBD context within close walking distance to all major public transport services including bus, heavy rail, Metro and light rail.

A Statement of Intent – Public Benefits accompanies the Planning Proposal and which is summarised in **Section 7.6** of this report.

As part of the delivery of the project, Stockland has set out specific tangible public benefits including monetary contributions that will be committed to as part of the project delivery. These benefits can be secured through a number of mechanisms including the amended Sydney LEP 2012 and DCP as well conditions associated with future development consents.

Q11 – What are the view of State and Commonwealth public authorities consulted in accordance with Gateway Determination

No consultation with State or Commonwealth authorities has been carried out to date on the subject Planning Proposal.

The Gateway Determination will advise the public authorities to be consulted as part of the PP process. Any issues raised will be incorporated into this PP following consultation in the public exhibition period. In accordance with the Gateway Determination, public exhibition of the planning proposal is required for a minimum of 28 days. The relevant planning authority must comply with the notice requirements for public exhibition of Planning Proposals in the LEP Making Guideline.

10. PART 4: MAPPING

It is expected that the objectives and intended outcomes of the Planning Proposal will be facilitated by a site-specific provision in the LEP, as detailed in **Section 9.2** of this report. Thus, no mapping amendments are expected to be required.

11. PART 5: COMMUNITY CONSULTATION

Pre-lodgement consultation with Council has been undertaken as outlined in **Section 3** of this report.

Division 3.4 of the EP&A Act requires the relevant planning authority to consult with the community in accordance with the Gateway determination. It is anticipated that the PP will be publicly exhibited for at least 28 days in accordance with the requirements of the DPHI guidelines 'A Guide to Preparing Local Environmental Plans'.

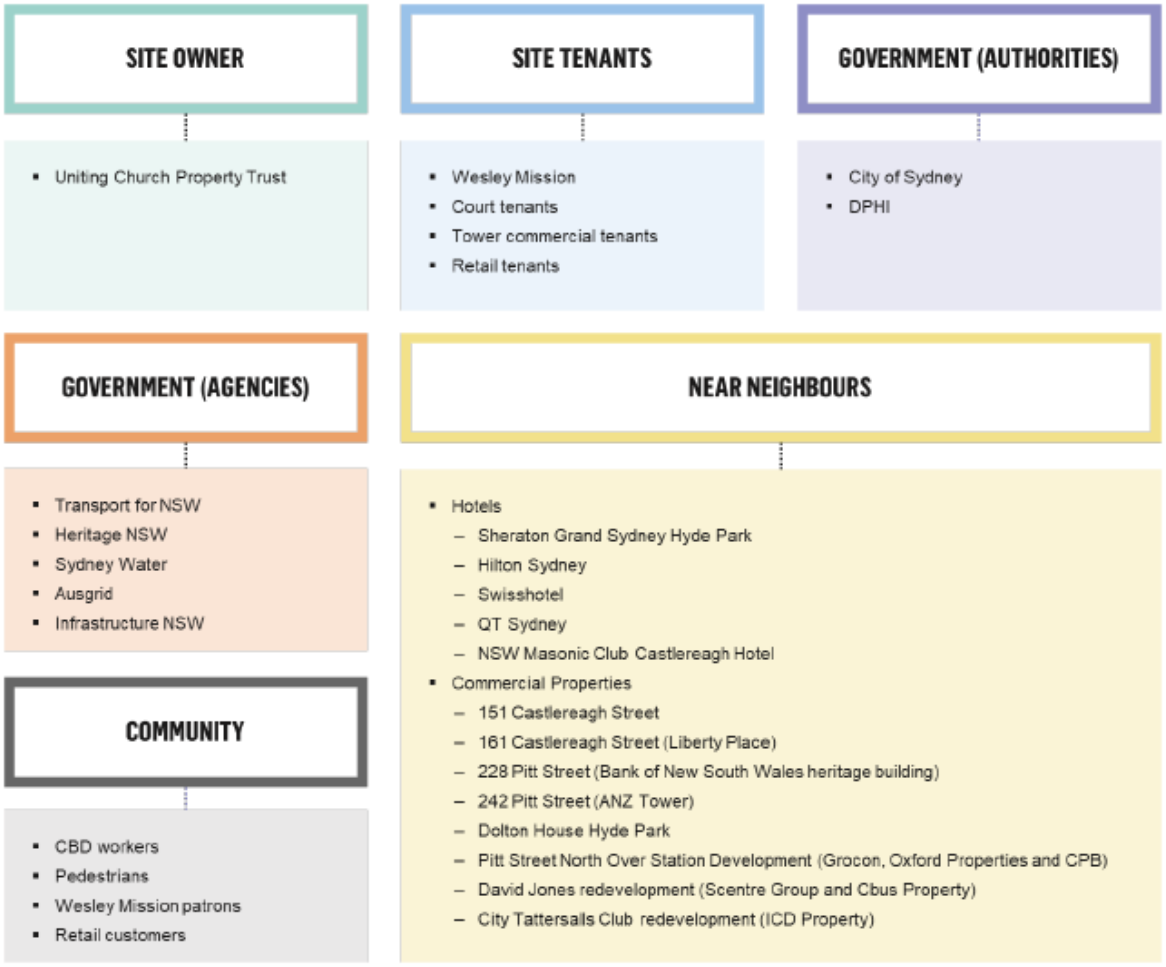
It is anticipated that the public exhibition would be notified by way of:

- A public notice in the local newspaper(s).
- A notice on the Council website.
- Written correspondence to adjoining and surrounding landowners.

The Gateway Determination and PP would be publicly exhibited at Council's offices and any other locations considered appropriate to provide interested parties with the opportunity to view the submitted documentation. As part of the public consultation process, the proponent will review all submissions, discuss with Council and DPHI as required, and provide written comments in response to assist in the assessment of the PP.

A stakeholder management plan accompanies the Planning Proposal which provides guiding principles and approach for engagement and a list of stakeholders which will be engaged. The engagement approach is primarily focused on the site's immediate surrounds. Key stakeholders include:

Figure 51 Stakeholder management plan



Source: Urbis

12. PART 6: PROJECT TIMELINE

The following table sets out the anticipated project timeline in accordance with the DPHI guidelines. The key milestones and overall timeframe will be subject to further detailed discussions with Council and the DPHI.

Table 27 Anticipated Project Timeline

Process	Indicative Timeframe
Consideration by Council / CSPC	September 2025 – December 2025
Planning Proposal referred to the DPHI	January 2026
Gateway Determination by DPHI	February 2026
Commencement and completion of public exhibition	April 2026
Consideration of submissions and consideration of the proposal post-exhibition	May - June 2026
Proposal reported back to Council for endorsement	August 2026
Date of submission to the DPHI to finalise the LEP	September 2026
Legal Drafting of the LEP	September - October 2026
Notification of the LEP	November 2026

13. CONCLUSION

The objectives and intended outcomes of this PP will be achieved by implementing a site-specific provision into Part 6, Division 5 of the LEP which will allow a maximum allowable FSR on the site of 19.67:1 which can achieve an FSR of 21.85:1 if a competitive design process has been held and the building demonstrates design excellence through a 10% FSR bonus.

- This PP also seeks amendments to the DCP to establish site specific provisions to guide the future development, including establishing building envelopes for the site as well as other key assessment criteria including the establishment of a through-site link, site vehicular access and car parking provision, and establish criteria for a future design excellence competition.

The amendments sought to the LEP and DCP have the ability to generate approximately 104,867sqm of floor space on the site.

This PP request to amend the Sydney LEP 2012 and Sydney DCP 2012 has been prepared in accordance with the relevant provisions of the EP&A Act, the regulations, applicable Local Planning Directions and the guidelines for the preparation of LEP amendments. The PP has been assessed against relevant State and local planning considerations including relevant Strategic Merit Tests. The PP is justified on planning merits for the reasons summarised as follows:

- The PP demonstrates a high level of consistency with the strategic planning framework governing the Greater Sydney Region and Sydney CBD and specifically, the CSPS and the accompanying Site Specific Planning Proposal Guideline. The CSPS seeks additional commercial floor space capacity in Central Sydney while also accommodating a mix of land uses to contribute to the diversity of the Sydney CBD. The PP is consistent with the LEP Guidelines which provides a pathway for a mixed-use PP on solar access sites.
- To ensure the Sydney CBD remains competitive and maintains its global status, both in terms of quantity, quality and availability of office floor space, the PP seeks to significantly enhance the capacity of the site to accommodate commercial, retail, place of public worship and residential land uses.
- The indicative reference schemes will generate jobs both during construction and operation which will have flow on effects to the local and broader domestic economy.
- The PP demonstrates strong site-specific merit due to the following:
  - The Urban Design Report and Concept Reference Schemes (**Appendix A**) demonstrates how the site can accommodate the increased floor space density to increase the employment generating capacity of the site which is a significant improvement to the existing site condition.
  - The proposal will retain and ‘upcycle’ the existing building structure at 133 Castlereagh Street and creates the potential if required to retain Wesley in situ, and will demonstrate global best practice for environmental sustainability and carbon emission savings.
  - The proposal will deliver significant public domain improvements including a through-site link between Pitt and Castlereagh Streets and enhances pedestrian amenity and activation at the ground plane.
  - The proposal will significantly enhance the public domain along Castlereagh Street through removal of the existing parallel basement parking ramp which is a significant intrusion into the public realm.
  - The proposal will reduce the existing parking provision and remove the existing casual public parking arrangements.
  - The availability of a large site extending to 4,800m2 in area is a significant opportunity to deliver larger premium grade floor plates maximising daylight access and improved amenity.
  - Redevelopment of the site provides the opportunity to deliver an efficient and sustainable site-specific outcome within proximity of the site to transport corridors and local, strategic and metropolitan centres. As explored within the Sustainability Strategy, this will ultimately slow emissions growth and contribute to a low-carbon city, aligning with the sustainability priorities of State and local policies.

  - The site is not subject to significant ecological or environmental constraints due to its development history and location within a built urban area, and local infrastructures and services have already been accommodated on the site.

- An environmental impact assessment has been undertaken to accompany the PP which has found that:
  - The redevelopment of the site will result in an equivalent outcome in terms of wind safety when compared to a 'base case' envelope as per Schedule 12, Procedure B of the Sydney DCP 2012.
  - The redevelopment of the site will result in an improved outcome in terms of SVF when compared to a 'base case' envelope as per Schedule 12, Procedure B of the Sydney DCP 2012.
  - A utility services assessment prepared by ARUP confirms that existing utility services available to the site can be augmented to meet the increased demand generated by the proposal.
  - Flooding advice confirms that the future development is capable of achieving relevant flooding criteria subject to implementation of flood mitigation measures to be detailed at the DA stage.
  - The subterranean conditions are suitable to accommodate the future redevelopment of the site, noting that the site is already substantially excavated. Any future works will be managed to avoid the zone of influence of the rail tunnels.
  - The future building on the site is capable of achieving relevant acoustic policies and standards.
  - The building envelope proposed through this PP is consistent with the Hyde Park SAP resulting in improved sunlight access to Hyde Park compared to the existing condition.
  - The redevelopment of the site will result in the rationalisation and improvement of car parking and vehicular access arrangements, and an overall reduction in parking on the site.
  - The building envelope is assessed to have acceptable from a heritage perspective.

In accordance with the above, it is submitted that the proposed amendments to the LEP are appropriate in that they are consistent with the State's strategic direction in that it will provide additional and diversification of floor space in Central Sydney.

We recommend that Council resolves to support this PP to the NSW DPHI Gateway Review Panel and the issuing of a Gateway Determination that facilitates the proposed amendments to the LEP.

DISCLAIMER

This report is dated 27 September 2025 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd **(Urbis)** opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Stockland **(Instructing Party)** for the purpose of Planning Proposal **(Purpose)** and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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