

8 March 2022

Mr Tim Raimond
Deputy Secretary, Strategic Land Use Planning
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Mr Raimond

Sydney Metro Submission on draft Pyrmont Peninsula Design Guidelines

This submission responds to the exhibition of the Pyrmont Peninsula Sub Precinct Master Plans, including the amendments to planning controls and the draft Pyrmont Peninsula Design Guidelines as they relate to the Sydney Metro Eastern site at 37-39 Union Street Pyrmont and Sydney Metro Western site at 26-32 Pyrmont Bridge Road.

Sydney Metro supports the nominated amendments to the Sydney Local Environmental Plan 2012 relating to building height and floor space ratio, including nominated tower heights and setbacks (Metro Eastern Site), podium heights (East and Western Sites) and the Objectives set out in the Pyrmont Peninsula Design Guidelines.

Sydney Metro seeks the following amendments:

- Update Figure 4.1 (Building Envelope Plan Metro Eastern Site) to the Figure below which identifies an area within which a tower may be located.
- Remove Figure 4.2 (Building Envelope Section Metro Eastern Site) and Figure 4.3 (Building Envelope Axonometric for Metro Eastern Site) as they will no longer be relevant.



Figure 01: Proposed amended Building Envelope Plan, Metro site east

Sydney Metro

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The proposed amendments to the Design Guidelines will enable Sydney Metro to:

1. *Undertake detailed design development of the Metro station and over station development (OSD) above to ensure proper technical, safety and design consideration.*

The identification of the Tower Location Area as shown in Figure 01 above allows Sydney Metro to properly investigate, assess and explore the optimal design solution for the site including integration of structural elements.

The interface between Pyrmont Metro station and over station development (OSD) is complex and must respond to line wide challenges such as alignment with running tunnels that traverse underground, environmental, and geotechnical constraints.

The station design needs to address site specific operational considerations that include provision for patronage, platform requirements, entries and egress, vertical transportation, structural and servicing requirements. Stations are also required to comply with Authorising Engineering Organisation (AEO) standards.

2. *Facilitate realisation of the strategic objectives of the Pyrmont Peninsula Place Strategy to deliver housing*

It would not be feasible for Sydney Metro to pursue an OSD and tower form based on the proposed Building Envelope Plan, Building Envelope Section and Building Envelope Axonometric (for metro eastern site) as shown in the draft Design Guidelines without including the Tower Investigation Area.

This is due to the highly constrained area within which the OSD would need to be positioned to avoid potential conflicts and meet station related technical, engineering and safety requirements.

This outcome would not be consistent with the Government's objectives for creating new housing and jobs and Big Move 3 in the Place Strategy which identifies Sydney Metro West as a catalyst for growth.

3. *Enable high quality design solutions and appropriate consideration of solar performance*

Additional and detailed solar analysis would support the Concept Stage 1 State Significant Development (SSD) Application for the OSD in relation to the protection of sunlight to adjoining residential properties at 1-5 Harwood Place and 17-21 Pyrmont Bridge Road. In accordance with the draft Design Guidelines (4.2.2.8) this additional work would be informed by detailed survey of the metro eastern site and adjoining properties, assessment of development applications for the adjoining properties, development of specific models, and detailed solar modelling.

The preliminary analysis indicates that the resolution of a final tower envelope at this stage would be premature as several building design options can achieve necessary solar access requirements and meet compliance with the Apartment Design Guidelines (ADG).

Defining a building envelope at this early stage of the design process would jeopardise the delivery of a building which can achieve design excellence and commercial viability.

Sydney Metro acknowledges the importance of achieving high quality design and place outcomes for the Pyrmont Peninsula and is committed to ensuring that the Objectives expressed in the Design Guidelines will be met by ensuring the following actions:

- The Concept Stage 1 SSD application will adhere to the place outcomes identified in the Pyrmont Place Strategy, the Objectives of the Pyrmont Peninsula Design Guideline, and Sydney Metro's Station and Precinct Design Guidelines which will be the subject of approval by the Secretary of DPE as part of the State Significant Infrastructure (SSI) process.
- Site specific design guidelines will be prepared by Sydney Metro for the Pyrmont East Metro site which will be reviewed by the Sydney Metro Design Advisory Panel and publicly exhibited with the Concept Stage1 SSD application. These guidelines will complement the Pyrmont Peninsula Design Guidelines and the Pyrmont Station and Precinct Guidelines.
- The design of the OSD will be guided by the Sydney Metro Design Advisory Panel chaired by the Government Architect and comprising independent renown design experts. The advice from the DAP will inform the preparation of the Concept Stage1 SSD. City of Sydney Council will also be invited to participate in this process.

It is noted that a specialised approach to achieve design excellence for over station development arises from the complexity of the design and divestment process.

It is anticipated that formal planning will commence for the OSD in 2022. Sydney Metro will be undertaking the detailed design of the metro station and OSD in parallel.

Sydney Metro is committed to ongoing engagement with DPE, City of Sydney Council, key stakeholders and local community as part of the planning process. Please contact Abbey Johnson, Director, Place Making & Property should you require any further information abbey.johnson@transport.nsw.gov.au.

Yours sincerely,



Ivan Glavinic

Deputy Executive Director, Place Making & Property