

-- CONFIDENTIAL --



15 December 2021

██████████
NSW Department of Infrastructure, Planning and Environment
GPO Box 39
SYDNEY NSW 2000

Dear Sir/Madam,

RE: DRAFT SYDNEY OLYMPIC PARK MASTER PLAN 2030 (INTERIM METRO REVIEW) - SUBMISSION 1.0 INTRODUCTION

This letter has been prepared on behalf of ██████████ as a formal submission to the exhibition of the “Draft Sydney Olympic Park Master Plan 2030 (Interim Metro Review)”, Explanation of Intended Effects, Planning Report and supporting documents as exhibited between 17 November 2021 and 15 December 2021, referred in this submission as the “Interim Metro Review”. ██████████ and its associated entity ██████████ has a long-term Leasehold interest over ██████████, Sydney Olympic Park that effectively provides for “Freehold” development rights in accordance with the Sydney Olympic Park Master Plan 2030 (2018 Review). Referred to in this submission as ██████████ The property at ██████████ is shown below in Figure 1:

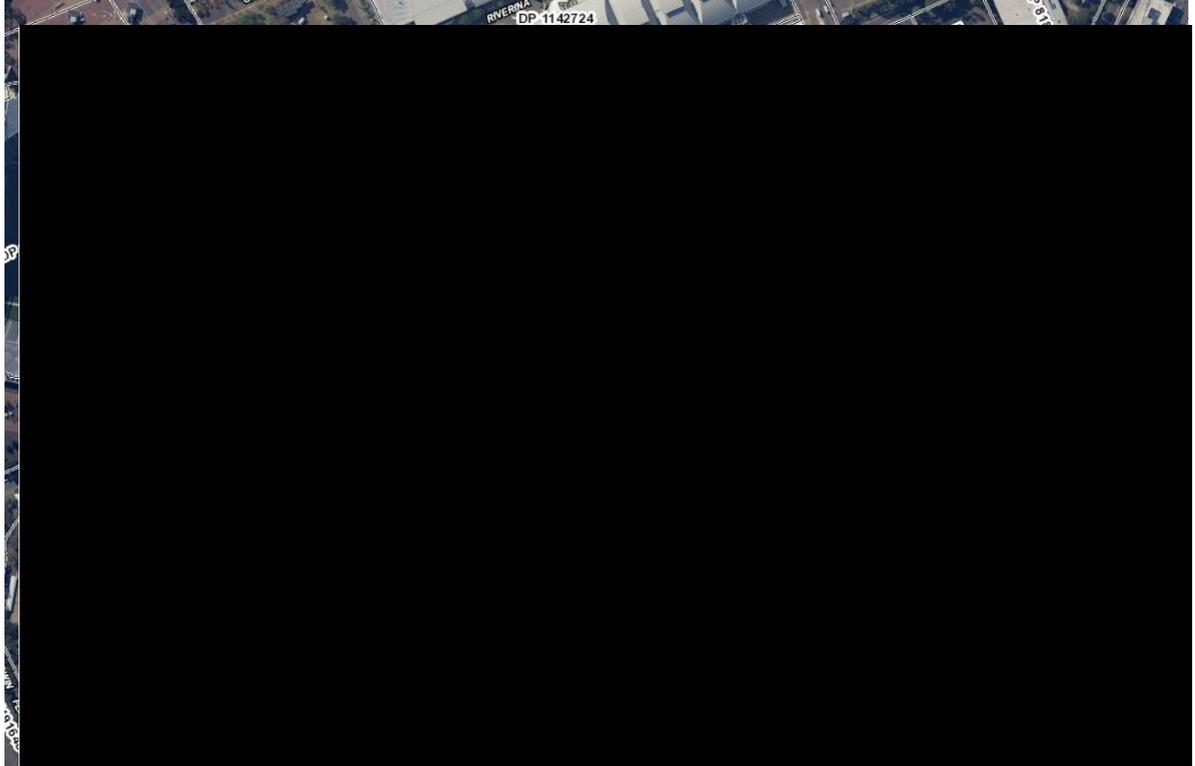


Figure 1: Aerial View of ██████████, Sydney Olympic Park (site outlined in red and shaded yellow) *Source:* NSW SiX



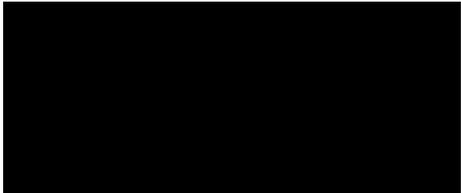


The land at [REDACTED] has frontage not only to [REDACTED], but also to [REDACTED] and [REDACTED], with a site area of 10,090m².

The land at [REDACTED] currently has a number planning controls assigned under the Sydney Olympic Park Master Plan 2030 (2018 Review) and associated *State Environmental Planning Policy (State Significant Precincts) 2005 Sydney Olympic Park* maps as summarised in Table 1 below:

Table 1: Summary of Planning Controls on [REDACTED]

Outcome	Requirement
Zoning	B4 Mixed Use
Floor Space Ratio (FSR)	6.5:1 and 10% bonus via Design Competition
Height of Building (HOB)	45 storeys to Olympic Boulevard 149 metres maximum
Podium Height	28 metres / 8 storeys to Olympic Boulevard Between 4 and 8 storeys along new local road
Setbacks	5 to 10 metres above podium 30 metres along entire frontage to Sarah Durack Drive for pedestrian
Boulevard Colonnade	2 storeys high and minimum 4 metres wide with evenly spaced columns at maximum of 8 metre centres
Ground floor frontage to Olympic Boulevard	Retail / non-residential
Other Public Domain Benefits	Through site link and new local road
Residential Tower	Maximum depth 18 metres (glass line to glass line) Each storey above 15 th storey maximum sized floor plate not to exceed 800m ² in Gross Floor Area (GFA)





Allocation of GFA	Retail – 2,00m ²
	Residential – 68,701m ²
	Community – 2,000m ²
	Education – 7,000m ²

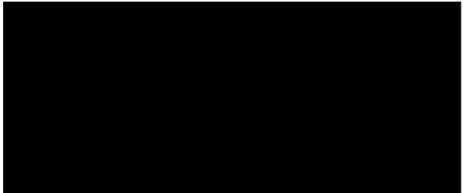
It is noted that the “Interim Metro Review” is accompanied by several documents, collectively these are referred to in this submission as the “Interim Metro Review”.

Figure 1 on page 6 of the Planning Report demonstrates the land affected by the Interim Metro Review, as extracted below:



Figure 2: Extract from Keylan Planning Report page 6 “Figure 1 Central Precinct and Metro Site Area (Source: Hatch / Roberts Day)”

The relationship between the [redacted] site at [redacted] is to the [redacted] of the land shaded light green with an “M” as shown above being “Metro Site Area”, being Sites 40, 47 and 48 within the Central Precinct.





It is understood that Sydney Metro West as part of Transport for NSW has acquired the land shown as “Metro Site Area”, as such while the Interim Review has been prepared for SOPA the changes proposed will benefit Transport for NSW.

2.0 ISSUES WITH MASTER PLAN INTERIM REVIEW 2.1 *Inconsistent Height and Scale*

It appears the information included in the Interim Metro Review, seeks to deviate away from the long-established principles and requirements of the Sydney Olympic Park Master Plan 2030 (2018 Review) inclusive of its predecessors being the Sydney Olympic Park Master Plan 2030 and the early version which emphasise the tallest buildings within the Central Precinct would be confined to the frontages along Olympic Boulevard.

Even the land at which the existing Olympic Park railway station does not have height and scale controls which are comparable to land which fronts Olympic Boulevard because the existing 2018 Review (and the earlier Master Plan iterations) nominates the tallest built forms are to be confined to Olympic Boulevard within the Central Precinct.

The changes in height on sites 40, 47 and 48 (or any portion of the land identified for the Metro Site) must demonstrate that they do not result in any additional shadowing on the land owned by [REDACTED] when compared to existing height and associated shadow impacts already permitted under the 2018 Review and associated SEPP Maps. The information presented does not demonstrate this and as such the information is inadequate for a conclusion that the changes are suitable in terms of solar access to adjoining properties and should be presented in a comparative manner.

The changes in height on sites 40, 47 and 48 (or any portion of the land identified for the Metro Site) must demonstrate that they do not result in any view loss of iconic landscape from the land owned by [REDACTED] when compared to existing height and associated views as a result of the already permitted under the 2018 Review and associated SEPP Maps. The information presented does not demonstrate this and as such the information is inadequate for a conclusion that the changes are suitable in terms of view access (or conversely view loss) from adjoining properties and should be presented in a comparative manner.

An additional way to present information is also in a simplified format such as a table. [REDACTED] requests the information be presented in the Interim Metro Review be demonstrated in a tabular form with a column to list the existing controls and column for new controls.

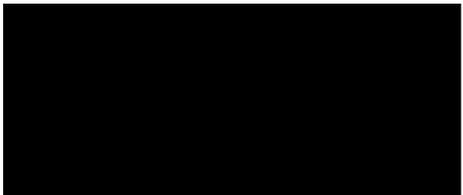
Inadequate justifications have been presented to deviate from the long-held principles for the height controls within the Central Precinct.

The information in its current form does not adequately demonstrate that the increased height will not unacceptably impact on [REDACTED]

2.2 *Independent Design Review by State Design Review Panel*

The opening line of the Planning Report states the Master Plan Interim Review has been prepared “... on behalf of the Sydney Olympic Park Authority (SOPA) to support the Sydney Olympic Park Master Plan 2030 (Interim Review) (specifically Section 5.2 for the Central Precinct) to address the future delivery of the Sydney Metro West Station within Sydney Olympic Park.

At Section 1.5 of the Planning Report the project team members are outlined. This includes an “Independent Design Review Report” prepared by Sydney Olympic Park Authority (SOPA).





The independence of the review is questionable given SOPA has reviewed work products prepared by the design team who have been engaged by SOPA at their instruction as the client in the first instance. And, while not questioning the SOPA appointed Design Review Panel, they will not consider future SSD application/s for the Metro site.

As such, this submission requests at a minimum a genuine independent design review of the Master Plan Interim Review be undertaken which cannot be SOPA or the SOPA Design Review Panel, if truly to be referred to as "independent". Rather, given the importance of the project and the site's context with future SSD application/s, the State Design Review Panel within the Government Architect's office should consider the quality of the changes to the development controls for Sites 40, 47 and 48 (Metro site) and the impacts of the changes on adjoining land, as a process to complete a design excellence process.

2.3 Reason/s for Interim Metro Review

The Planning Report advises under the heading in Section 1.1 Sydney Metro West and Sydney Olympic Park Metro Station on page 8:

To facilitate and accommodate the delivery of the Metro Station and associated development, SOPA is seeking to amend the Master Plan 2030 (2018 Review), specifically Section 5.2 for the Central Precinct. To reflect these changes, amendments to the State Environmental Planning Policy (State Significant Precincts) 2005 (SSP SEPP) will also be required.

The Master Plan 2030 (Interim Metro Review) provides the opportunity to revisit targets and strategies set out in Section 5.2 of the Master Plan 2030, bringing them into alignment with the proposed Sydney Metro West Station within the Central precinct.

Prior to announcing the locations of any new metro station associated with the new Metro West railway line, the NSW State Government advised the public it would complete a feasibility study.

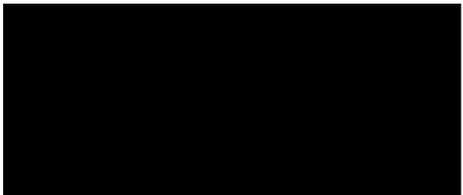
If the justifications for the changes proposed to this Metro Site are valid, so too the same justifications are valid for other parcels of land within the Central Precinct as the State Government already undertook a feasibility study prior to announcing the location of the Metro Station

Specifically, if the justifications for sites 40, 47 and 48 within the Central Precinct to increase in height are valid, and the impacts of the changes do not result in unacceptable impacts (which [REDACTED] [REDACTED] reserve their right to contest until complete information is made available) then so too the same justifications could equally apply to all land to support the new infrastructure based on a strategic argument, otherwise isn't this just a SSD DA with a site specific outcome which really isn't strategic planning but rather a one off exercise, and the remaining land parcels which currently do not enjoy the 149m height limit could equally mount the same arguments, as all land in the precinct will generate patronage of the rail system when operational.

The inclusion of one site alone undermines the whole of the 2018 Review, which was to avoid this exact situation.

3.0 CONCLUSION

Given the above, [REDACTED] cannot support the proposed changes to the Sydney Olympic Park Master Plan 2030 (Interim Metro Review) without:





1. first a truly independent design review of the Interim Review package of information be completed by the NSW Government's appointees in the State Design Review Panel; and
2. any change in height on any portion of the land identified for the Metro Site does not result in any additional shadowing on the land owned by [REDACTED] when compared to existing shadow impacts associated with the already permitted height controls under the 2018 Review and associated SEPP Maps; and
3. any change in height on any portion of the land identified for the new Metro Site does not result in any additional loss of views from land owned by [REDACTED], than those already available under the 2018 Review and associated SEPP Maps.

[REDACTED] would appreciate any new information being prepared as a result of this submission be made available for consideration prior to a determination of the Interim Metro Review and any future associated gazettal of mapping changes under the SSP SEPP and / or a SSD DA.

Representatives from [REDACTED] and their experts welcome the opportunity and are available to meet with SOPA and the Department to discuss the above concerns directly.

Should you have any queries or require clarification on any matters please do not hesitate to contact the undersigned on [REDACTED]

Yours faithfully,

[REDACTED]
[REDACTED]
[REDACTED]

