

urbis.com.au

Angel Place, Level 8, 123 Pitt Street
Sydney NSW 2000 Australia (Gadigal Country)
Urbis Ltd
ABN 50 105 256 228



15/04/2026

Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy St, Parramatta, NSW 2150

To whom it may concern,

We refer to the proposed redevelopment of Oxford and Verona Street, for which application for approval was submitted under State Significant Development Application SSD 87245208. This letter provides responses to further information required by Heritage NSW and Sydney Water which must be addressed as part of the Response to Submissions (RTS) package to DPHI.

Should you have any questions, please don't hesitate to contact us.

Kind regards,

Ivana Vetta
Director
+61 2 8349 3859
ivetta@urbis.com.au



Table 1 Response to RFI

Heritage NSW	Urbis Response
1. Section 3.2 of HARDEM states that basements and piling are not proposed below 2 Verona Street to ensure that Busby's Bore is not impacted, while Section 6.1.7 of the EIS states that archaeological monitoring will be required for deeper excavation, including piling or deeper footings in the vicinity of the bore. In relation to the areas below 2 Verona Street, and the rear of 13-15 Oxford Street in the vicinity of Busby's Bore, please confirm: a. whether any piling works are required; and b. the anticipated depth of excavation.	Northrop response: a. Piling works are required for the full perimeter of the basement, which has a Bulk Excavation Level (BEL) of approximately RL37.6. Within the vicinity of Busby's Bore we understand that there is an existing piled shoring wall along the line of the existing building's basement. A new shoring wall is proposed to be installed on the inside face of this existing shoring wall, to allow for the basement excavation and to minimise any impact on the existing shoring wall and assets/strata in behind the wall. b. The anticipated Bulk Excavation Level (BEL) in this area of the basement is approximately RL37.6 Urbis response: The HARDEM provides methodology specifically for work occurring within the vicinity of Busby's Bore, referred to as Zone 3 (see Section 3.8). Per the methodology, any excavation, including piling, within the vicinity of the bore (Zone 3) will be archaeologically monitored to mitigate risks to the bore.



2. Within areas identified as having nil-low potential it is noted that high archaeological potential has also been identified for deeper undocumented remains. These areas are classed as 'Zone 2' management areas, proposed for management under an unexpected finds procedure. In relation to these areas, please clarify:

a. the likelihood of the proposed works extending below previously disturbed areas and impacting areas with high potential to contain intact archaeological deposits; and

b. how assessment of nil-low potential for 2 Verona Street was determined, noting that parts of 11-15 Oxford Street appear to have been subject to more extensive disturbance through the development of a service station in the 1940s, and more recent excavation for the basement levels of the existing apartment complex.

a. The site has potential for undocumented structural remains associated with the historic industrial brewery, including subterranean storage cellars, settling tanks, fermentation cellars, channels, pits, and machine footings for steam engines and boilers, as well as cesspits, wells, water tanks, cisterns, and former services. Archaeological deposits are likely to be associated with these more robust structural features but are unlikely to survive intact. These features are typically very deep, and while they may be more disturbed in areas where basements exist, there remains a high potential for their presence across the site.

Within 13-15 Oxford Street, the proposed basement will be approximately 6.3-6.4m deeper than the current basement level while no basement is proposed below 2 Verona St. Within 13-15 Oxford Street, the current basement level is approximately 3.5m below the current street level and based on historical information (see HAA Figure 13) it is clear that the natural ground in this area was somewhat raised likely truncated during following the widening of Oxford Street in the early 20th century thus it is understood that while there is the potential for deep features to survive, it is likely they have already been heavily disturbed with only the base surviving.

b. With respect to disturbance, Section 4.5.2 of the Urbis HAA (2025, 54) assessed land use and disturbance at 11-15 Oxford Street and 2 Verona Street and concludes that both areas have been subject to a high level of disturbance, excluding the location of the Busby Bore. The HAA notes that:

"The construction of the existing two-storey building between 1930 and 1943 encompasses the entire original Lot 9 (2 Verona Street), which would have removed or highly impacted the 1920s stables and earlier 1880s timber shed and timber outbuilding (privy)."

Although 11-15 Oxford Street has experienced more extensive disturbance events, both areas fall within the assessed range of high disturbance. Furthermore, the archaeological resource at Verona Street comprises timber buildings, which are less likely to have survived and were therefore assessed as having nil-low archaeological potential, resulting in a convergent management outcome to 11-15 Oxford Street despite differing disturbance histories.



3. Please provide an assessment of potential construction vibration impacts to Busby's Bore and identification of any specific mitigation measures to ensure that Busby's Bore is not impacted by vibration during construction (if required).

According to EI Australia's assessment, the vibrations during excavation can be managed to have minimal transmission to Busby's Bore, such as the use of saw-cutting at the edge of the excavation and using smaller size hammers. In conjunction, a vibration monitoring plan with suitable limits and monitoring regime can be prepared to advise on vibration monitoring points to be adhered to during excavation and construction.

Sydney Water

1. Busby's Bore is a heritage-listed water supply tunnel which runs underneath the site. It is a Sydney Water owned asset and is listed on the New South Wales State Heritage Register, Sydney Water's Section 170 Heritage Register, and the Sydney Local Environmental Plan 2012 as a heritage item with state significance.

- a)** The proponent should show the location of Busby's Bore in the Section plans, demonstrating the proposed separation from basement excavation and construction and relative depth compared with the proposed new building basement levels.
- b)** The proponent should provide Sydney Water with their construction methodology for review by the Sydney Water Heritage Team – this methodology must outline how Busby's Bore will be protected from potential impacts during excavation and shoring/piling works and throughout construction and beyond. The methodology must demonstrate how Busby's Bore

Urbis Response

a) The Section Plan – Cultural Creative & Courtyard (see page 6) dated 10/04/2026, Drawing No. A 207 provided by TZG shows the location of Busby Bore and curtilage in relation to the proposed basement works.

b) According to Northrop/EI Australia, the construction methodology will be provided to Sydney Water at the CC stage as a condition of consent.

c) Section 3.7 of the HARDEM provides an Unexpected Finds Protocol while Section 3.8 provides a stop work procedure specifically for the discovery of Busby's Bore. The report states:

"Should it or any potential state significant archaeology relate to it, be exposed at any point during the archaeological program, excavation works will cease in that location and Heritage NSW will be notified, works cannot recommence in the vicinity of the Bore unless with advice from Heritage NSW"

In addition to this statement, should any discovery be made related to Busby's Bore, works will cease immediately in the area and Sydney Water's Heritage team as well as Heritage NSW will be contacted. Advice will be sought from both agencies prior to works recommencing within the affected area.

- d)** Section 3.5 of the HARDEM provides a Heritage Induction as part of the methodology that states:
- "Prior to the commencement of any archaeological field program, a heritage induction would be delivered by the nominated Excavation Director to all relevant construction personnel for the purpose of establishing:*
- *Heritage obligations of all project personnel.*
 - *Why the subject site is archaeologically significant and how it is protected under legislation.*



will be protected to the satisfaction of Sydney Water's Heritage Team.

c) The proponent should provide Sydney Water with their stop works procedure for if unexpected finds occur in relation to Busby's Bore, noting the alignment has only been partially mapped. This procedure must include a requirement that in the event of a find being discovered having potential to be associated with Busby's Bore, work must immediately cease in the vicinity and Sydney Water's Heritage Team must be contacted.

d) A heritage specific induction must be included as a condition of consent for all personnel working on site. This induction must outline the significance of Busby's Bore and provide background regarding its undetermined location, and how to avoid impacts.

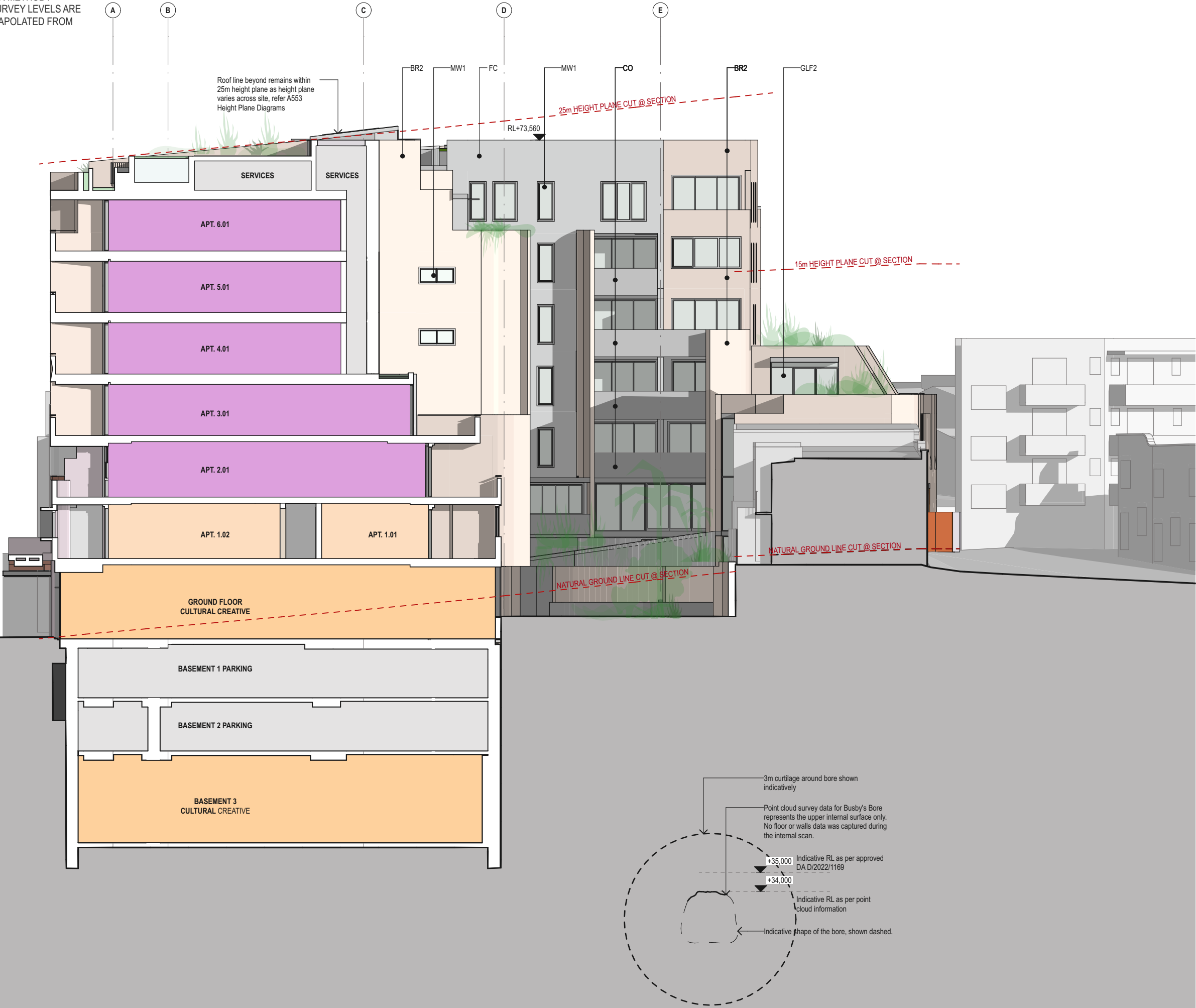
e) There is an opportunity for inclusion of heritage interpretation for Busby's Bore within the new development. Busby's Bore must be considered and incorporated into any heritage interpretation strategy being prepared in accordance with the conditions of consent.

- *What kind of relics may occur within the subject site and where.*
- *What the current archaeological program is seeking to undertake (e.g. - test excavation, monitoring, salvage) and how that fits into any other site activities presently being undertaken.*
- *How to work with monitoring or supervising archaeologists, including any stop works procedures for archaeological finds.*

Heritage induction material should be provided to all site personnel as part of the induction. Induction materials can include copies of the archaeological reports, approvals, Safe Work Method Statements (SWMS), and digital materials such as PowerPoint slides for integration into other contractor's site induction for large scale works programs."

e) Should a Heritage Interpretation Strategy be required for the site, Busby's Bore will be considered within the strategy.

NOTE: NATURAL GROUND LINE DRAWN IN ACCORDANCE WITH THE 'BETTAR METHOD'. NOTE THAT WHERE EXISTING SURVEY LEVELS ARE NOT KNOWN, LEVELS ARE EXTRAPOLATED FROM FROM NEAREST KNOWN POINT.



DATE	REV	DESCRIPTION
10/4/2026	-	For SSDA

Do not scale off drawings or use CAD files for any set-out, shop-drawing production or construction. Use figured dimensions only. Check all measurements on site and report any discrepancies to the architect. These designs, plans, specifications and the copyright therein are the property of Tonkin Zulaikha Greer Architect Pty Ltd and must not be reproduced or copied wholly or in part without written permission of Tonkin Zulaikha Greer Architects Pty Ltd.

Planner Urbis	Civil + Stormwater Telford Civil
Landscape Architect Wyer & Co	Geotech EI Australia
Structure Northop	BCA BCAlign
Building Services O&S Consulting	Traffic JMT Consulting
Basix + ESD Credwell	Waste Elephants Foot
Fire + Acoustic E-Lab	Access Purple Apple

Architects
TonkinZulaikhaGreer

117 Reservoir Street
Surry Hills NSW 2010
Australia

ABN 46 002 722 349
T +61 2 9215 4900
W tgz.com.au
E info@tgz.com.au

Client
WT Malouf

Suite 1.03, 2-8 Elizabeth Street
Paddington NSW 2021
Australia

T 02 9331 4000
E -

Project
Verona, Paddington

Phase
SSDA

Job No.
24026

Drawing Title
SECTION - CULTURAL CREATIVE & COURTYARD

Drawing No.
A 207

Rev No.
-

Drawn
AM, IR, CY

Date
10/4/2026

Checked
TG



Nominated Architects
Peter Tonkin NSW Registration 4147
Tim Greer NSW Registration 5603