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By email [mick.fallon@planning.nsw.gov.au](mailto:mick.fallon@planning.nsw.gov.au)

Dear Mick

**Notice of Exhibition – Sydney Metro City and Southwest (Chatswood to Sydenham) Modification 2 – “Central Walk” (SSI 7400 MOD 2)**

I refer to your letter dated 18 June 2017 which invites the City of Sydney (“the City”) to comment on the request for modification of the Sydney Metro City and Southwest (Chatswood to Sydenham) project approval.

**1. Overall Support for the Implementation of Central Walk**

The City strongly supports the implementation of Central Walk as it will enhance the safety, comfort and convenience of people accessing the existing heavy rail, new light rail and future metro lines from Surry Hills.

Given the significant numbers of people walking and cycling around the site, it will be important to put in place a construction management access plan that deals with the people activity in this area.

**2. The need to construct the western section of Central Walk**

Implementing only the eastern section of Central Walk is considered insufficient. The project should include constructing the western section now as a greater number of transport customers (particularly associated with Metro) will be seeking to access the western side of the station. The western side also has a higher special event demand and implementing the western section would reduce these peaks at Town Hall Station. In addition the projections for growth in passenger demand to the west are higher than to the east.

**3. Access to Central Walk from the western side of Chalmers Street**

The City notes that the current design provides for access to the eastern section of central walk to from the eastern side of Chalmers Street only.

There should also be provision for access and vertical circulation on the western side of Chalmers Street by lift and escalators in order to serve the large number of customers moving between the inbound light rail platform and Central Station and reduce the conflicts between people crossing Chalmers Street and light rail

vehicles. Reduced conflict would improve safety for all and improve the reliability of light rail operations.

This will be particularly important during peak periods and special events.

#### **4. The design of Central Walk should be compatible with future plans in the surrounding area**

The design of the initial stage of Central Walk must allow for its extension to the west and to a future expanded Railway Square. Levels and alignments should therefore be determined with the design of Railway Square, and potential future Metro Stations (such as under Lee Street or the Western Concourse of Central Station) in mind.

#### **5. Design and finishes of Central Walk structures**

Central Walk will be a major civic landmark as a new major address/access point to the Central Station transport hub. It is in a location with a clear and predominant masonry street wall and should be designed as a high quality infill to this context. The functional need for large access portals and windows for daylighting the subgrade escalators and stairs will need to be balanced with passive solar control measures to deal with heat gain and glare arising from the North West aspect of the primary façade.

The rear elevation of the building to Randle Lane should also be of high quality to complement proposed developments currently under assessment on the facing east side of Randle Lane, and should be designed to improve the activation and supervision of Randle Lane.

#### **6. Address access and safety issues associated with the Dental Hospital**

The project should also seek to reconfigure vehicular access to the Dental Hospital to be off Randal Lane and remove the access from Chalmers Street. This would resolve a number of outstanding safety and access issues plaguing the CBD and SE Light Rail project.

#### **7. Strategic opportunities**

The extension of the axis of Central Walk through 20-28 Chalmers Street and beyond to the east, transecting the existing building at 7 Randle Street could provide a potential pedestrian entrance at the intersection of Randle Street, Elizabeth Street and Cooper Street. This would have the potential benefit of spreading pedestrian movements from the heavily congested east-west pedestrian axes of Devonshire and Foveaux Streets to an additional east-west pedestrian route along Cooper Street.

7-13 Randle Street is currently the subject of a planning proposal for additional height and floor space for a hotel development. The City is of the view that the strategic transport planning significance of the 7 Randle Street site should be explored by Transport for NSW.

## 8. Heritage

The Central Walk project proposes the demolition of the existing Bounce Hotel at 20-28 Chalmers Street, originally the Metro Goldwyn Mayer (MGM) Building. Although rare as an example of a commercial Spanish Mission style commercial building in Sydney, the building is not highly intact and has had substantial alterations including a third floor addition above the original bracketed eaves/cornice to Chalmers Street. The State Heritage Inventory report is attached.

The City has considered alternative sites along the east side of Chalmers Street that could be demolished as an alternative to the Bounce Hotel (MGM) building. To the north, the Sydney Dental Hospital is also a heritage item which is both more significant and more intact than the former MGM building. To the south is the recently completed strata apartment building. This is not a heritage item and could be readily demolished. However, it is too eccentric to the proposed axis of Central Walk, and too close to the existing south exit/Devonshire Street Tunnel exit of Central to be workable.

Given the crucial civic role of the new exit buildings, the City believes that demolition of the Bounce Hotel (MGM) building is potentially acceptable provided that it is recorded in archives, and that key building elements are salvaged for onsite interpretation and/or reuse for other conservation projects.

The interesting history of the building, and its intact and salvageable architectural features present excellent opportunities to interpret the history of the site in the public space of the new access building. In particular, the spectacular terrazzo entry vestibule floor and architectural ironwork on the façade could be integrated into a permanent interpretative display. This should be required by consent condition.

Recommended consent conditions are attached including:

- Archival Photographic recording
- Archival Measured Drawings
- Salvage

These may require further editing to make them fit for purpose as infrastructure consent conditions.

## 9. Noise and Vibration

The relevant vibration criteria for heritage items appears to reference a criteria of 7.5mm / second which the City understands is consistent with the approval. However, the Environmental Impact Statement (EIS) for Sydney Metro City and Southwest (Chatswood to Sydenham) has also referenced the DIN 4150 as relevant for intrinsically vibration sensitive structures. The modification does not give regard to this.

As a general comment, it was hard to ascertain the extent of the proposed works encapsulated by the modification. The main impact of the new works will be the new mining and excavation for the eastern concourse and its egress which will be underneath Chalmers St between the adjacent private uses and Central Station, and emerge next to Chalmers street between the Sydney Dental Hospital and the Central Hotel respectfully.

## ***Intensity of noise and vibration impact***

### **a. Intensity of airborne noise impact**

- The report emphasises that at most locations that surround central station there will be no more than a 1% increase in noise associated with the modification works. However the City points out that the works associated with the modification are localised and the impacts at that locality can be expected to be produced.
- The construction activities for the proposed modification would result in some additional exceedances for some receivers. The receivers which would experience the largest potential change in impacts are those located in the immediate vicinity of the proposed eastern entry.

These properties are:

- Residential at 30-34 Chalmers Street
- Sydney Dental Hospital at 2 Chalmers Street
- Residential at 17 Randle Street
- Residential at 38 Chalmers Street
- Residential at 86-92 Chalmers Street
- Commercial at 11 Randle Street
- Commercial at 405 Elizabeth Street
- This is likely to significantly increase with the modification given the expanded footprint of the station works. Some criterion exceedances over 20 dB will occur, but the acoustic assessment provides no further guidance on how far these exceedances will go. In the City's experience demolition noise impact can be quite significant, as associated with the activities proposed. This is liable to cause significant duress, and may not be mitigated without substitution of activities like impact hammering to demolish the building, or strict and meaningful respite.
- The receivers noted above are likely to be impacted by noise levels in the order of up to and over 20 dB above the set noise criteria. This will result in day, evening, and night noise levels of 86 to 88, 78 to 81 and 70 to 77 respectively at residential receivers. It is understood that the Sydney Dental Hospital has an internal noise criteria of 45dB set, and is indicated as having noise criteria exceedance in the order of or over 20dB, effectively meaning internal noise levels of 65+dB. Similarly, commercial noise receivers subject to 20 dB criteria exceedances will be subject to noise levels of 70dB where they have an internal noise level of 50.
- The City is of the view that this degree of noise impact will potentially have considerable effect on the occupants of the building, particularly the residents and the dental hospital, and that the targeted consultation with these receivers is appropriate in addition to planning to implement alternative treatments, noise mitigations and processes instead of waiting for associated complaints to occur in the future.

## b. Intensity of Ground-Borne Noise Impact

- The analysis of potential daytime ground-borne noise impacts of the proposed modification indicates three residences located around the eastern entry would have exceedances of the Noise Management Level of greater than 20 dB. Around four commercial receivers located around the eastern entry would have exceedances greater than 20 dB.
  - The Sydney Dental Hospital would have an exceedance of the criteria by more than 20 dB
  - Two additional residences located around the eastern entry would have exceedances of 10 dB to 20 dB
  - Two additional residences located around the eastern entry would have exceedances of up to 10 dB
- In residences and the dental hospital, this will effectively mean that noise levels in the order of 65 dB will occur, with commercial receivers experiencing up to 70 dB of noise. This is not necessarily in the absence of airborne noise impact. Planning to implement alternative mitigations and treatments and bringing forward detailed assessments of site impact are relevant here.
- High impact activities will be caused by mining machinery and impact hammers. It is considered worthwhile planning to avoid these impacts where possible, particularly with consideration of the use of less impact hammers such as high inertia, reduced impact time hammers for use in breaking up rock rather than smaller low inertia hammers. The use of Cardox and Nonex systems as substitutes where the impact is known with a high confidence interval to be high.
- Whilst the report points out that these impact levels (airborne, ground-borne and vibration) will not occur all the time, it concedes that on these working days the impacts could occur up to 50% of the time. The City considers that as the high impact mining and excavation works move further from the sensitive location, levels will decrease and this is relevant to the issue above.
- It is anticipated that these levels will be detrimental to activities in the Sydney Dental Hospital that require considered precision of dexterity, such as surgery. Further planning and consultation around the impact on this receiver is considered important.

## c. Intensity of vibration impact

- Section 11.3.2 *Construction Ground-Borne Vibration* of Chapter 11 of the C2S – *Central Walk Modification Report* proposes a vibration particle velocity criteria of 7.5mm/s based on the British Standard BS 7385 relevant to both unreinforced or light framed structures and heritage items for this modification. We note the EIS prepared on basis of the main approval, of which *Appendix E Chapter 5.6.1 Heritage*, recommends that heritage items which are found to be structurally unsound should be managed to the stricter DIN 4150 criteria of 2.5mm/s.
- We are concerned that buildings which standard to be vibration impacted by the proposed modification which are and are not heritage listed, are susceptible to vibration in at least a way that could cause cosmetic damage. The typically accepted basis of control of vibration impact in these circumstances provides that structural damage will not occur whereby cosmetic damage would not occur.

- Whether buildings are heritage or not but of a construction methodology that is known to be sensitive to cosmetic damage from vibration (e.g. period construction stone cladding, blockwork, architraves and ornamental plaster), we consider the appropriate criteria is 2.5mm/s within the German DIN 4150-3 technical standard unless the finishes of the building are certified by an appropriately person to be resilient to a higher level of vibration impact.
- Buildings which contain original period glazing and ornate plaster could stand to be adversely affected from a cosmetic damage standpoint at levels of around 7.5mms per second, pieces of blocks render and plaster can become dislodged, falling off and affecting occupants. These levels are also likely to cause severe annoyance.
- Section 11.5.3 – *Vibration* of Chapter 11 of the *C2S – Central Walk Modification Report* that during excavation of the station, vibration levels associated with the modification are anticipated to exceed criteria at two station platforms and three commercial buildings located to the east and around the northern corner of Prince Alfred Park. It also notes that vibration levels associated with the modification works would exceed a cosmetic damage screening criteria of (taken to be 7.5mm/s in the report) at the heritage listed premises of the RC Henderson Factory, Railway Institute Building and Sydney Dental Hospital.
- We note that a detailed assessment is indicated as necessary, and urge that this assessment considers the finer grain detail of the affected building and any inherent vibration sensitivity it may have. This should focus on vetting any potential injury to occupants from cosmetic damage to the building and preventing annoyance. We caution against an approach which permits a degree of damage to any heritage structures to occur with a focus to “making them good after” in that it is not always possible to repair the damage to an original standard and what is of heritage or otherwise cosmetic value is then lost.
- As per the Martin Place Modification EIS, the report indicates that a criteria of 25mm/s may be more appropriate for some of the heritage receivers that are in the locality of the Central Station Metro modification works. We caution against this and recommend that the City reviews the site specific assessment reports.
- We further note that although not all the adjacent buildings are heritage listed, many are of a stonework cladding or blockwork structure and may include construction elements that are vibration sensitive and nonetheless may need consideration against the DIN 4150 standard. We are cautioning here against identifying a structure as vibration sensitive only on the basis of whether that structure is heritage listed.

## Conclusion

Conditions A37, A38, A39 and A40 in determination (SS15\_7400) relate to an Environmental Audit Program to ensure all associated mitigation measures or actions to improve the environmental performance of the construction and operation of the project. These must be incorporated in Modification 2.

These mitigation measures should form part of any approval of the modification. It is also recommended that additional and extensive community consultation of this modification be undertaken, covering the construction phase of the development.

Should you wish to speak with a Council officer about the above, please contact Jesse McNicoll, Urban Design Coordinator, on 9265 9098 or at [jMcNicoll@cityofsydney.nsw.gov.au](mailto:jMcNicoll@cityofsydney.nsw.gov.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'G Jahn', with a large, stylized initial 'G'.

**Graham Jahn AM**  
**Director**  
City Planning | Development | Transport

**Recommended Heritage consent conditions for  
Sydney Metro Project Modification 2: “Central Walk”**

**(1) ARCHAEOLOGICAL ASSESSMENT**

An archaeological assessment undertaken by a suitably qualified archaeologist must be submitted to and approved by Council’s Heritage Specialist prior to the issue of a Construction Certificate. The report must assess whether the proposed works have the potential to disturb any archaeological remains and the need for any archaeological investigation prior to commencement of any works on site. The report should also recommend measures and documentation to be undertaken during the process of demolition and excavation work.

Recommendations by the archaeological assessment are to be implemented during the process of demolition and excavation work.

Should the assessment report suggest the site may contain relics and the proposed work may disturb them, the consent authority may request the applicant to amend the proposal so that the relics are properly protected or interpreted.

**(2) ARCHAEOLOGICAL DISCOVERY DURING EXCAVATION**

- (a) Should any relics be unexpectedly discovered on the site during excavation, all excavation or disturbance to the area is to stop immediately and the Heritage Council of NSW should be informed in accordance with section 146 of the *Heritage Act 1977*.
- (b) Should any Aboriginal objects be unexpectedly discovered then all excavation or disturbance of the area is to stop immediately and NSW Government Office of Environment and Heritage is to be informed in accordance with Section 89A of the *National Parks and Wildlife Act 1974*
- (c) Should any archaeological remains or Aboriginal objects be discovered, a copy of recording of the finds and the final archaeological summary report is to be submitted to Council prior to the Occupational Certificate;
- (d) if the discovery is on City of Sydney-owned land, the City of Sydney must be informed.

**(3) ARCHAEOLOGICAL INVESTIGATION**

- (a) The applicant must apply to the Heritage Division of the Department of Environment and Heritage for an excavation permit under Section 140 of the *Heritage Act 1977*.
- (b) Should any potential archaeological deposit likely to contain Aboriginal objects be identified by any person during the planning or historical assessment stage, application must be made by a suitably qualified archaeologist to the NSW Government Office of Environment and Heritage for an excavation permit for Aboriginal objects.



- (c) The applicant must comply with the conditions and requirements of any excavation permit required, and are to ensure that allowance is made for compliance with these conditions and requirements into the development program.
- (d) General bulk excavation of the site is not to commence prior to compliance with the conditions and requirements of any excavation permit required.
- (e) Should any relics be unexpectedly discovered in any areas of the site not subject to an excavation permit, then all excavation or disturbance to the area is to stop immediately and the Heritage Council of NSW should be informed in accordance with section 146 of the *Heritage Act 1977*.
- (f) Should any Aboriginal objects be unexpectedly discovered then all excavation or disturbance of the area is to stop immediately and NSW Government Office of Environment and Heritage is to be informed in accordance with Section 89A of the *National Parks and Wildlife Act 1974*;
- (g) Should any archaeological remains or Aboriginal objects be discovered, a copy of recording of the finds and the final archaeological summary report is to be submitted to Council's Heritage Specialist prior to issue of an Occupation Certificate.

#### **(4) ARCHIVAL DOCUMENTATION (MEASURED DRAWINGS)**

The archival recording of the former Metro Goldwyn Mayer building 20-28 Chalmers Street Surry Hills should include accurate measured drawings of the following:

- (a) The building and the site as a whole including:
  - (i) Location Plan
  - (ii) Site Plan (1:500 or 1:200)
  - (iii) Floor Plan/s (1:100 or 1:50)
  - (iv) Roof Plan/s (1:100 or 1:50)
  - (v) Elevations and Sections (1:100 or 1:50)
- (b) Components of the building including original entrance doors, tripartite arched entrance openings, façade architectural metalwork, bracketed eaves/cornice, decorative terrazzo floor in entrance vestibule and other significant details such as rainwater heads at 1:5 scale.

Measured drawings should be cross-referenced to each other, clearly titled, indicate scale, orientation and date of execution. The drawings can also be annotated or hatched to reveal more about the heritage significance of the site or object (e.g. to differentiate between dates of construction, materials and finishes and vegetation types). For further guidelines, refer to the NSW Heritage Division of the Department of Environment and Heritage Information Series publication titled 'How to prepare Archival Records of Heritage Items'.

The measured drawings are to be submitted to and approved by the consent authority prior to the issue of a Construction Certificate.

**(5) DISPOSAL OF SURPLUS SALVAGED MATERIALS**

Salvaged traditional building materials surplus to the requirements of the interpretation plan for this project including bricks, decorative façade details including cornice brackets, architectural metalwork, and original joinery are to be sold to an established dealer in second hand heritage building materials. Documentation of the salvage methodology must be submitted for the approval of Council prior to the commencement of demolition.

**(6) HERITAGE INTERPRETATION PLAN**

- (a) An interpretation plan for the former Metro Goldwyn Mayer building at 20-28 Chalmers Street must be submitted to and approved by Council's Urban Design and Heritage Manager prior to a Construction Certificate being issued. The plan is to be prepared by a suitably qualified and experienced heritage practitioner or historian.
- (b) The interpretation plan must detail how information on the history and significance of the former Metro Goldwyn Mayer building at 20-28 Chalmers Street will be provided for the public and make recommendations regarding public accessibility, signage and lighting. Public art, details of the heritage design, the display of selected artefacts are some of the means that can be used.
- (c) The plan must specify the location, type, making materials and contents of the interpretation device being proposed.
- (d) Prior to occupation certificate being issued the approved interpretation plan must be implemented to the satisfaction of the consent authority.

**(7) HISTORIC MARKER**

A plaque of high-quality material (e.g. bronze or stainless steel) describing the history of the site and building must be installed on the facade of the building prior to an Occupation Certificate being issued. The design, location and wording must be submitted for the approval of the consent authority prior to manufacture and installation. The marker is to be incorporated into the heritage interpretation plan if a plan is required by this consent.

**(8) PHOTOGRAPHIC ARCHIVAL DOCUMENTATION (MAJOR WORKS)**

Prior to a Construction Certificate being issued, an archival photographic recording of the former Metro Goldwyn Mayer building at 20-28 Chalmers Street is to be prepared to the satisfaction of the consent authority. The recording is to be in digital form, prepared in accordance with the NSW Heritage Division of the Department of Environment and Heritage guidelines titled "Photographic Recording of Heritage Items using Film or Digital Capture". One copy of the record is to be submitted to Council to be lodged with Council's Archives.

Procedure

For buildings or structures with heritage significance, the archival documentation, and the number and type of selected enlarged photographs required will be determined by the significance and quality of the building or structure. For a scope of work, refer to Council's Heritage Specialist to determine the particular architectural/design features of the building/site that may need to be recorded.

For buildings or structures with no heritage significance the archival documentation requirements are less comprehensive, and may just be limited to contextual and exterior photographs only. However, this will depend upon the type, complexity and significance of the building, and should be confirmed with the Area Planning Manager, and if necessary Council's Heritage Specialist.

Because significant fabric may remain concealed and only be exposed during construction works, the archival recording is to be undertaken in stages, prior to the removal of any significant building fabric or furnishings from the site, during the removal of fabric on site that exposes significant building fabric or furnishings, and after work has been completed on site, as considered appropriate by the conservation architect commissioned for the project, and submitted as two parts as follows.

- (a) The first submission of the archival recording of significant building fabric or furnishings is to be prior to the removal of any significant building fabric or furnishings from the site, and must be submitted to and approved by Council prior to the commencement of any work on site and prior to a Construction Certificate being issued.
- (b) The second submission of the archival recording is of significant building fabric or furnishings that is exposed during demolition or construction and after work has been completed on site, and must be submitted to Council prior to an Occupation Certificate being issued.

The form of recording is to be a photographic documentation of the site and its context, and the exteriors and interiors of the existing building(s) photographed, where appropriate, using a camera/lens capable of 'perspective correction'. The photographic recording is to be in digital form, prepared in accordance with the NSW Heritage Division of the Department of Environment and Heritage guidelines titled 'Photographic Recording of Heritage Items using Film or Digital Capture'. One copy of the record is to be submitted to Council to be lodged with Council's Archives.

- (c) For each of the two submissions listed above in (a) and (b), the digital form of the recording is to be as follows:
  - (i) The Development Application number and the Condition of Consent number must be noted.
  - (ii) Include a summary report detailing the project description, date and authorship of the photographic record, method of documentation and limitations of the photographic record.
  - (iii) The electronic images are to be taken with a minimum 8 megapixel camera, saved as JPEG TIFF or PDF files with a size of approximately 4-6MB, and cross referenced to the digital

catalogue sheets and base plans. Choose only images that are necessary to document the process, and avoid duplicate images.

- (iv) Include written confirmation, issued with the authority of both the applicant and the photographer that the City of Sydney is granted a perpetual non-exclusive licence to make use of the copyright in all images supplied, including the right to make copies available to third parties as though they were Council images. The signatures of both the applicant and the photographer must be included.
- (v) The report can be submitted on a USB, CD or DVD, in PDF/A format (created directly from the digital original), with a digital catalogue of images with the following data for each: DOS title, image subject/description and data photograph taken.

## **(9) USE OF HERITAGE CONSULTANT - MAJOR DEVELOPMENT**

- (a) An experienced heritage consultant is to be commissioned to work with the consultant team throughout the design development, contract documentation and construction stages of the project. The conservation architect is to be involved in the resolution of all matters where existing significant fabric and spaces are to be subject to preservation, restoration, reconstruction, adaptive reuse, recording and demolition. The heritage consultant is to be provided with full access to the site and authorised by the applicant to respond directly to Council where information or clarification is required regarding the resolution of heritage issues throughout the project.
- (b) Evidence and details of the above commission on the above terms are to be provided to the consent authority prior to the issue of the Construction Certificate or commencement of work on site whichever is the earlier.
- (c) Throughout the documentation and construction stages of the approved works the experienced heritage consultant is to:
  - (i) Undertake site inspections of not less than fortnightly intervals.
  - (ii) Maintain a diary of site inspections that includes photographs of the works, details of heritage advice and decisions arising out of each inspection and any further physical evidence uncovered during the works.
  - (iii) Compile a final report, including the diary, verifying how the heritage conditions have been satisfied, and the works completed in accordance with the Conservation Management Plan.
- (d) Upon completion of the works, the final report is to be submitted for approval by the consent authority prior to the issue of an Occupation Certificate or the commencement of the use, whichever is the earlier.