



RESPONSE TO SUBMISSIONS: SSD-39587022

Central Barangaroo Early
Works - Hickson Road
Interface

Prepared for
AQUALAND B DEVELOPMENT HOLDING PTY LTD
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EXECUTIVE SUMMARY

This Submissions Report has been prepared on behalf of Aqualand B Holding Development (**Aqualand**) (**the applicant**) to address the matters raised by government agencies, local Council, the community and relevant stakeholder groups during public exhibition of the proposed development within Central Barangaroo – Hickson Road Interface (**the site**).

The State Significant Development Application (**SSDA**) was lodged with the Department of Planning, Industry and Environment (**DPIE**) in accordance with clause 3, Schedule 2 of the *State Environmental Planning Policy (Planning Systems) 2021*.

DPIE issued a letter to the Applicant on 25 July 2023 requesting a response to the issues raised during the public exhibition of the application. The following specific matters were identified by DPIE:

- Timing – clarify timing between the proposal and the delivery of the Barangaroo Metro Station, rail corridor and the Hickson Road public domain works by Infrastructure NSW.
- Noise – revised acoustic assessment and clarification on construction hours sought.
- Stormwater management and flooding – clarification around temporary stormwater diversion/management and updated flood assessment.
- Sydney Metro – provide additional information requested by Sydney Metro.

This Submissions Report outlines the proposed clarifications to the design whilst responding to all concerns raised within submissions.

Overview of Submissions

The SSDA was on public exhibition between 30 May 2023 and 26 July 2023. A total of 9 submissions were received from NSW government agencies and Council, 1 submission was received from an individual. Submissions were received from the following agencies:

- Environment and Heritage Group (**EHG**) – within DPE
- NSW Environment Protection Authority (**EPA**)
- Heritage NSW
- Sydney Metro
- Transport for New South Wales (**TfNSW**)
- Ausgrid
- DPE Water
- Sydney Water

The key issues raised in the submissions can be broadly grouped into the following categories:

- Construction impacts – general amenity and pedestrian / traffic-related impacts (including cumulative).
- Noise and vibration impacts during construction.
- Stormwater management and flooding.
- Consideration of the adjacent Sydney Metro construction activities and future operation (rail corridor protection and electrolysis).
- Contamination and remediation.
- Heritage and archaeology (built heritage and maritime archaeology).

Since only a small number of submissions were received, this Submissions Report provides a response to each individual submission within **Section 4**.

Actions Taken Since Exhibition

Since the SSDA was publicly exhibited, the Applicant has undertaken further consultation with relevant government agencies (DPE, Sydney Metro and City of Sydney) to discuss the issues raised within their submissions.

Additional assessments have also been prepared to respond to the issues raised within the submissions. These include:

- New reports/documents:
 - Maritime Archaeological Assessment (**MAA**)
 - Electrolysis Risk Report (**ERR**)
 - Acoustic Letter
 - Civil Engineering Letter
 - Geotechnical Engineering Letter
 - Structural Statement
- Updated reports:
 - Acoustic Impact Assessment (revised noise and vibration assessment) (**AIA**)
 - Preliminary Construction Environmental Management Plan (**CEMP**)

Response to Submissions

Most submissions received from DPE, NSW Government agencies and Council primarily request the submission of additional information only. Therefore, no design or other refinements to the project are necessary.

A comprehensive response has been provided to all comments raised by Government and community stakeholders. This includes the submission of additional information and a range of new technical assessments.

Updated Justification and Evaluation

This Report, in addition to the EIS previously submitted, assesses the development as proposed in accordance with the relevant planning instruments and policies, and outlines the mitigation measures to ensure the project does not result in unreasonable or adverse environmental effects. Additionally, the proposed development satisfies the Secretary's Environmental Assessment Requirements (SEARs) issued for the project.

The key issues for all components of the project identified in the SEARs have been assessed in detail, with specialist reports underpinning the key findings and recommendations identified. It has been demonstrated that for each of the likely impacts identified in the assessment of the key issues, the impact will either be positive or can be appropriately mitigated.

The proposal is consistent with State and local strategic planning policies and development controls:

- This application represents the first application for works within the Central Barangaroo site, which will be the final stage to be delivered in the broader, state significant Barangaroo precinct under the approved Concept Plan (MP06_0162).
- The proposal is the first step in the realisation of the considerable, decades-long investment in the western CBD harbour foreshore.
- The proposal is permissible with consent and meets the relevant statutory requirements of the relevant environmental planning instruments.
 - *State Environmental Planning Policy (Planning System) 2021*

- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *State Environmental Planning Policy (Precincts—Eastern Harbour City) 2021*
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021*

The design responds appropriately to the status of interface works within the immediate context.

The structural and civil design of the proposed works is supportable as:

- The proposed works include the direct 'tie-in' interface with the delivery of Barangaroo Station undertaken by Sydney Metro.
- The proposal will provide stabilisation support to the Hickson Road surface for both the public domain improvement works and renewal of Hickson Road which will be undertaken by Infrastructure NSW, as well as the later precinct basement excavation works for Central Barangaroo which will be undertaken by the applicant under the terms of the approved Concept Plan.
- The proposed secant pile wall is located approximately 2.5m away from the outer edge of the existing Sydney Water sewer pump station (SP1129) and a temporary cased secant pile solution with temporary bracing will be implemented to ensure there are no impacts to the operation of the existing asset, ahead of its future relocation and upgrade as part of Hickson Road renewal works.
- The works will enable the removal of the redundant shoring wall that is not able to be integrated and is no longer required for its original temporary purpose of retaining Hickson Road during the EPA remediation works which occurred in 2018.
- Whilst alternatives for the proposed early works were considered by the applicant, the timing and physical interface dependencies of the works with the activities outlined above deem the proposed scope and staging the most appropriate and viable option for the site.

The proposal is highly suitable for the site:

- The suitability of the site for the delivery of a future mixed-use precinct was confirmed through the issuing of the Concept Approval MP06_0162 (as modified). The works are consistent with the terms of the Concept Approval and as such remain suitable for the site. Further, there are no significant environmental constraints that would limit the proposal from being constructed at the site.

The proposed development is considered in the public interest for the following reasons:

- The proposal is consistent with relevant State and local strategic plans and complies with the relevant State planning controls.
- No adverse environmental, social or economic impacts will result from the proposal.
- The proposal will achieve the following objectives:
 - Initiate early establishment works for the future mixed-use waterfront precinct development at Central Barangaroo in accordance with the approved Concept Plan (MP06_0162).
 - Effective management and mitigation of environmental impacts, including disruptions to neighbouring businesses, residents and visitors, as well as minimising construction impacts of the adjoining Barangaroo Station to ensure liveability is retained.
 - Contribute towards the strengthening of the Harbour CBD by enabling early works that will facilitate future development which will provide a significant increase in employment-generating floor space, housing, cultural uses and open space opportunities in Barangaroo.

In view of the above, it is considered that this SSDA for early works continues to have significant merit and should be approved subject to the implementation of the mitigation measures described in this report and supporting documents.

1. INTRODUCTION

This Submissions Report relates to the initial stage of early works and construction of a secant pile retention wall at the Hickson Road interface of Central Barangaroo (**the site**). On behalf of Aqualand B Development Holding (**Aqualand**) (**the Applicant**), this Submissions Report has been prepared to address the matters raised by public agencies, local Council, the community and other relevant stakeholders throughout the public exhibition period.

The State Significant Development Application (**SSDA**) was lodged with the Department of Planning and Environment (**DPE**) in May 2023 (**SSD-39587022**). The SSDA was placed on public exhibition for 28 days from 30 May 2023 to 26 June 2023.

This Submissions Report has been prepared in accordance with the DPIE *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) July 2021*.

1.1. EXHIBITED PROJECT

The SSDA proposes to expedite an initial stage of early works along a short section of the site's eastern boundary to coordinate the works with ongoing and proposed construction activities being undertaken by NSW Government agencies along the Hickson road interface with Central Barangaroo.

Specifically, as documented in the EIS this SSDA seeks consent for:

- Partial demolition of an existing shoring wall capping beam along Hickson Road;
- Construction of a new secant pile retention wall;
- Excavation of land related to the secant pile retention wall;
- Localised remediation related to the secant pile retention wall;
- Associated Archaeological Investigations in the area of excavation and works;
- Sydney Metro/Hickson Road interfaces – perimeter retention wall interface works, and Hickson Road public domain interface works; and
- Relocation of stormwater and other services to enable the permanent works outlined above.

1.2. SUPPORTING DOCUMENTATION

This Submissions Report is supported by the following technical reports and documentation.

Table 1 Supporting Documentation

Appendix	Report	Prepared By
Appendix A	Infrastructure NSW Letter	Infrastructure NSW (INSW)
Appendix B	Acoustic Response Letter	Acoustic Logic
Appendix C	Acoustic Impact Assessment (Revised)	Acoustic Logic
Appendix D	Stormwater Management and Flooding Response Letter	Warren Smith
Appendix E	Maritime Archaeological Assessment	Mountains Heritage
Appendix F	Geotechnical Engineering Response Letter	Tetra Tech Coffey
Appendix G	Structural Statement	Robert Bird Group

Appendix	Report	Prepared By
Appendix H	Electrolysis Risk Report	Performance Electric
Appendix I	Preliminary Construction Management Plan (Revised)	Aqualand
Appendix J	Sydney Metro Reserves Survey Drawing	Rygate
Appendix K	Mitigation Measures (no change)	Urbis
Appendix L	Updated BDAR Waiver	DPE/EHG

2. ANALYSIS OF SUBMISSIONS

This section provides a summary of the submissions received including a breakdown of respondent type, nature/ position and number of submissions received.

2.1. BREAKDOWN OF SUBMISSIONS

The SSDA was publicly exhibited between 30 May 2023 to 26 June 2023. There were nine (9) submissions received from public agencies and the local Council, and one (1) submission received from the public.

All submissions were managed by DPIE, which included registering and uploading the submissions onto the 'Major Projects website' (**SSD-39587022**).

A breakdown of the submissions made by group and issues raised is provided in **Table 2** below.

Table 2 Breakdown of Submissions

Public Authority or Individual	Position
City of Sydney (LGA)	Objection
Ausgrid	Supports with comments (future conditions of consent)
DPE Water	Comments for consideration
Environment and Heritage Group (EHG)	Supports with comments (future conditions of consent)
Environment Protection Authority (EPA)	No comment
Heritage NSW – as delegate under the <i>National Parks and Wildlife Act 1974</i> and delegate for the Heritage Council NSW	Comments for consideration
Sydney Metro – Corridor Protection and Place Making and Precinct Activation teams	Comments for consideration
Sydney Water	Comments for consideration
Transport for NSW (TfNSW)	Supports with comments (future conditions of consent)
Paula Woodcock – public individual from High Street, Millers Point Community	Objection

Overall based on the 10 submissions received, eight (8) State government agencies either supported or comment on the project, subject to addressing certain comments/issues, one (1) public submission was received and the City of Sydney Council objected to the proposal.

Most issues raised in submissions related to the environmental impacts of the proposal as set out in **Section 2.2** below.

In their 'Issues Letter', DPE raised matters in relation to the project and environmental impacts. No submissions raised issues in relation to economic or social impacts.

2.2. CATEGORISING KEY ISSUES

Since only a small number of submissions were made, a response to each individual submission is included within the Response to Submissions in **Section 4**.

The key issues raised in the submissions include:

- Construction impacts – general amenity and pedestrian / traffic-related impacts (including cumulative).
- Noise and vibration impacts during construction.
- Stormwater management and flooding.
- Consideration of the adjacent Sydney Metro construction activities and future operation (rail corridor protection and electrolysis).
- Contamination and remediation.
- Heritage and archaeology (built heritage and maritime archaeology).

3. ACTIONS TAKEN SINCE EXHIBITION

In response to the key issues raised within the submissions, minor design refinements and clarifications have been made to the proposed development since public exhibition.

This section summarises the changes that have been made to the project since its public exhibition. It also outlines the additional assessment undertaken to respond to the concerns raised with the public agency, organisation and public submissions outlined in **Section 2**.

3.1. FURTHER ENGAGEMENT

Since the public exhibition of the SSDA between 30 May 2023 to 26 June 2023, the Applicant undertaken further consultation with the following NSW government agencies and Council:

- DPE:
 - July, August and September 2023 – Urbis on behalf of the Applicant has been engaging with DPE via email and phone to understand key issues, respond to queries around the proposal, clarify the role/trigger for the Independent Planning Commission (IPC) if Council do not remove their objection prior to determination and confirm the intended approach for RTS phase of the project.
 - 26 July 2023 – DPE advised that due to Council’s objection during the exhibition period the IPC is currently the consent authority. However, the application can be determined by DPE under delegation if Council advises in writing that their concerns have been resolved.
 - 1-3 August 2023 – the Applicant responded to DPE’s query regarding what development blocks under the Barangaroo Concept Plan the proposed secant pile was extending across.
 - 15 August 2023 – DPE confirmed they are satisfied with the applicant addressing each comment from each agency / Council separately given the nature of submission received.
 - 26 October 2023 – DPE confirmed via email that they will proceed with an updated BDAR Waiver based on advice received from EHG.
 - 9 November 2023 – DPE issued an updated BDAR Waiver (refer **Appendix L**).
- Sydney Metro:
 - August 2023 – The Applicant reached out to Sydney Metro’s Corridor Protection team requesting a meeting to discuss their comments. Sydney Metro officers advised a meeting was not necessary at this stage and requested details on the Applicant’s technical queries/responses.
 - 4 September 2023 – further information provided in response to queries (a), (b) and (c) was issued to Sydney Metro. The Applicant advised a response to item (d) would be provided in due course.
 - 12 September 2023 – Sydney Metro advised that further information regarding levels alignment “(b)” was required, item “(c)” was closed out and “(a)” is still under review (the Electrolysis Risk Report).
 - 6 October 2023 – Sydney Metro confirmed via email that item (a), being the Electrolysis Report, was closed out.
 - 10 October 2023 – Sydney Metro confirmed via email that item (d) was closed out.
 - 3 November 2023 – Further information has been provided to Sydney Metro (including an additional section plan with the surveyors mark-up) to clarify the proposed works are outside the Sydney Metro first reserve as required by item (b).

- City of Sydney Council:
 - 17 August 2023 – the Applicant met with the City of Sydney (**CoS**) to discuss MOD 9 and this early works proposal. The meeting included Graham Jahn, Director of City Planning, Development & Transport. CoS advised that its objection to EWDA-1 was related to the above ground proposal for MOD 9.

3.2. REFINEMENTS TO THE PROJECT

The majority of submissions received from DPE, NSW Government agencies and Council primarily request the submission of additional information only. Therefore, no design or other refinements to the project are necessary.

3.3. ADDITIONAL IMPACT ASSESSMENT

Additional assessments have been prepared to respond to the issues raised within the submissions. Given the nature of the submissions received, some of the documents previously submitted have been updated to provide further information. New and updated reports include:

- New reports/documents:
 - Maritime Archaeological Assessment (**MAA**)
 - Electrolysis Risk Report (**ERR**)
 - Acoustic Letter
 - Civil Engineering Letter
 - Geotechnical Engineering Letter
 - Structural Statement
- Updated reports:
 - Acoustic Impact Assessment (revised noise and vibration assessment) (**AIA**)
 - Preliminary Construction Environmental Management Plan (**CEMP**)

The findings and recommendations of the additional assessments are discussed in detail within the 'Response to Submissions' in **Section 4** of this report.

4. RESPONSES TO SUBMISSIONS

This section provides a detailed summary of the Applicant's response to the issues raised in submissions. The response has been structured according to the categorisation of issues outlined in **Section 2**.

Since only a small number of submissions were received during the public exhibition process from NSW government agencies, City of Sydney, and one public submission, a response to each individual submission is included in the following tables:

- Department of Planning and Environment (**Table 3**);
- City of Sydney Council (**Table 4**); and
- NSW Government Agencies (**Table 5**), and
- Public Submissions (**Table 6**)

4.1. RESPONSE TO DEPARTMENT OF PLANNING COMMENTS

Table 3 NSW DPE Submission

Summary of Issue Raised	Response	Supporting Documentation
NSW DEPARTMENT OF PLANNING AND ENVIRONMENT (DPE)		
<p>Timing</p> <p><i>Clarify the timing between the proposal and the delivery of the Barangaroo Metro Station, rail corridor, and the Hickson Road public domain works by Infrastructure NSW</i></p>	<p>The Letter provided by INSW (landowner) indicates the Hickson Road upgrades are currently programmed for completion in late 2025. The early works are expected to commence in 2024 following approval of the SSDA.</p> <p>INSW and Aqualand will maintain coordination with Sydney Metro and other key stakeholders regarding the staged delivery of infrastructure in the Barangaroo precinct.</p>	Appendix A
<p>Noise</p> <p><i>The acoustic assessment incorrectly classifies nearby residential receivers along Hickson Road as commercial receivers in error.</i></p>	<p>The revised Acoustic Impact Assessment has been updated to show residential receivers along Hickson Road. Relevant noise management levels specific to residential receivers have also been included.</p> <p>The predicted noise levels do not exceed the management level at these residential receivers. Therefore, no additional noise mitigation is required.</p>	Appendix B and Appendix C
<p><i>Confirm the hours sought for Saturday out of hours construction works.</i></p>	<p>The proposed hours of construction for <u>Saturday are 7am to 5pm</u>. The acoustic report has been updated to reflect this.</p> <p>The Preliminary CEMP outlines additional restrictions to hours of work for intensive activities.</p>	Appendix B and Appendix C
<p><i>Provide an assessment of the proposal against the City of Sydney Code of practice: Construction Hours and Noise in the City Centre (1992)</i></p>	<p>An assessment of the proposal against the <i>City of Sydney Code of practice: Construction Hours and Noise in the City Centre (1992)</i> has been provided within the Letter prepared by Acoustic Logic. The proposal is generally</p>	Appendix B and Appendix C

Summary of Issue Raised	Response	Supporting Documentation
	compliant with the strategy, noting the only significant differences relate to construction hours and the assessment of impacts on commercial receivers.	
<p>Stormwater Management and Flooding</p> <p><i>Clarify how long the proposed stormwater drainage diversion will be in place.</i></p>	<p>The proposed stormwater drainage diversion infrastructure works are estimated to be in place for approximately 16 months.</p> <p>This is dependent on the construction and staging of the permanent stormwater diversion works along Hickson Road. The final design of these works is not yet finalised.</p>	<p>Appendix A</p> <p>Appendix D</p>
<p><i>Confirm if the temporary stormwater management works are proposed as a permanent solution.</i></p>	<p>As outlined in the SSDA, the applicant will deliver temporary drainage diversion works where required as documented in the civil infrastructure documentation supporting (Options 1 and 2).</p> <p>INSW will be delivering permanent diversion of the drainage infrastructure on Hickson Road in the future. It is estimated this will be complete in late 2025.</p>	<p>Appendix A</p> <p>Appendix D</p>
<p><i>Provide an updated flood assessment that assesses the post development flooding impacts for a full range of flood events up to the Probably Maximum Flood event.</i></p>	<p>Additional flood modelling analysis and reporting will be undertaken as part of future detailed design and subsequent SSDAs for the broader Central Barangaroo redevelopment once these details are known and the permanent stormwater drainage design is finalised. This will include:</p> <ul style="list-style-type: none"> ▪ Flood modelling of the drainage upgrade. ▪ Undertaking a sensitivity / impact flood mapping to demonstrate there is equivalent hydraulic capacity between existing and proposed diversion. ▪ Identifying mitigation measures for any impacts associated with proposed drainage diversion on flooding or providing a permanent design that does not cause adverse impacts. ▪ Assessment of all flood events up to the PMF. 	<p>Appendix D</p>

Summary of Issue Raised	Response	Supporting Documentation
<p>Sydney Metro</p> <p><i>Provide the additional information requested by Sydney Metro.</i></p>	<p>The additional information requested has been provided to Sydney Metro as document in Section 3 ('Further Engagement'), Table 6 below (Response to Government Agency Comments) and the supporting documentation attached to this Submission Report.</p>	<p>Section 3</p> <p>Appendix F to H</p> <p>Table 6 (below).</p>

4.2. RESPONSE TO CITY OF SYDNEY COMMENTS

Table 4 City of Sydney Submission

Summary of Issues Raised	Response	Supporting Documentation
CITY OF SYDNEY (CoS)		
<p>Public Domain</p> <p><i>Approval is to be sought from Maritime Services Board and/or the City (land owners) for the diversion of two existing stormwater lines.</i></p>	<p>Noted.</p> <p>Following completion of the detailed design, approval will be obtained from the asset owner prior to commencement of any works.</p>	N/A
<p><i>It is proposed to divert stormwater along Hickson Road. A full assessment and stormwater design should accompany any future submission for the diversion of stormwater. Any such proposal will have impact on Hickson Road and any future upgrade works.</i></p>	<p>Noted.</p> <p>A hydraulic analysis of the proposed stormwater system and any future upgrades (known at the time of submission) will be undertaken during the future Detailed Design phase. This will ensure that the temporary stormwater diversion works will not result in any adverse flooding impacts on Hickson Road.</p>	Appendix D

Summary of Issues Raised	Response	Supporting Documentation
<i>Levels of Hickson Road were noted to be assumed to be lifted to near 3.50m RL from around 2.60m RL. This significant lift in levels will impact upon levels and required ramping in the public domain at both ends of the affected area at Hickson Road, before transitioning back down to existing RLs.</i>	<p>The final road design for Hickson Road will be completed by Sydney Metro and NSW and is currently in progress. The latest design indicates that it will be raised in many locations up to +3.5m RL.</p> <p>NSW has indicated that the Hickson Road upgrade works are scheduled for completion in late 2025.</p>	Appendix A
<i>The top of the proposed retaining wall projects above the level of the existing public domain levels. Confirm all proposed levels and consider impacts upon public access, tree planting, storm water and overland flow paths.</i>	<p>The final design of Hickson Road will confirm the future proposed public domain levels adjacent to the Central Barangaroo site. Future public domain levels within the site will be confirmed as part of future detailed SSDAs. The future design will consider public pedestrian access, tree planting (including street trees) and stormwater management. This will be finalised and delivered by NSW as outlined in their supporting letter.</p>	Appendix A
<p>Heritage and Archaeology</p> <p><i>The subject site shares its boundary with the State heritage listing of the Millers Point and Dawes Point Village Precinct (SHR 01682). The layout plan specifies a 50mm minimal set out tolerance between the boundary and the secant pipe cap beam. There is no significant fabric or features present on the western boundary of the SHR listed conservation area. The curtilage of this conservation area is not affected by the proposed work.</i></p>	Noted.	N/A
<i>The City agrees with the recommendations outlined in the submitted Heritage Impact Assessment Report regarding the development of the</i>	Noted. We anticipate these will be included as conditions on any consent issued.	N/A

Summary of Issues Raised	Response	Supporting Documentation
<i>construction vibration monitoring program and consultation with Council.</i>		
No significant concerns are raised regarding the conclusions and recommendations of the submitted Aboriginal Cultural Heritage Assessment Report and Historical Archaeological Assessment.	Noted.	N/A
<p>Contamination</p> <p><i>The remediation process is part of the works recommended within the Remedial Action Plan prepared for the whole site, dated May 2013, and endorsed by a part B Site Audit Statement, and Site Audit Report July 2013 outlining that the site could be made suitable for the proposed use. The remedial works plan relates to the section of the site by Hickson Road, where the proposed early works are planned and has been endorsed by the Site Auditor. An Acid Sulfate Management Plan has also been provided, which is endorsed by the Site Auditor.</i></p>	Noted.	N/A
<p>Noise Impacts</p> <p><i>The submitted Acoustic Report predicts some minor exceedances of the acoustic criteria for the proposed works for some neighbouring sites, which should be further addressed.</i></p>	<p>Acoustic Logic note the following:</p> <ul style="list-style-type: none"> ▪ The assessment examined likely noise impacts from the expected construction methodology and equipment (as exact methods/equipment are unknown at this stage). ▪ Some exceedances of the construction “noise affected” management levels are predicted. However, there will be no exceedances of the construction 	<p>Appendix B</p> <p>Appendix C</p> <p>Appendix I</p>

Summary of Issues Raised	Response	Supporting Documentation
	<p>“highly noise affected” management levels (Refer Section 6.2 of the Acoustic Report – 75dB(A)).</p> <ul style="list-style-type: none"> ▪ The site perimeter is currently bounded by a timber hoarding barrier for mitigation. ▪ Additional noise time limits are proposed in the CEMP to mitigate potential noise impacts for noisy construction activities. ▪ The assessment recommends further examination during the detailed design phase where typical activities exceed the ICNG management levels. This will investigate alternative equipment, construction methods and additional mitigation/management to determine whether additional feasible and reasonable measures are required to minimise impacts. ▪ City of Sydney have recommended a condition to this effect. This includes a detailed assessment as part of the ‘Demolition, Excavation and Construction Noise and Vibration Management Plan’. 	
<p>Conditions recommended by Council:</p> <ul style="list-style-type: none"> ▪ (2) Demolition, Excavation and Construction Noise and Vibration Management Plan ▪ (12) Hours of Work and Noise – CBD 	<p>Acoustic Logic note the following in response to proposed conditions 2 and 12:</p> <ul style="list-style-type: none"> ▪ Condition 2 – this condition should be modified to be consistent with other conditions relating to noise impacts. The conditions require all work to comply with the 1992 Code of Practice. However, other conditions permit noise level exceedances of the Code criteria provided additional time management measures are imposed. <ul style="list-style-type: none"> a. Acoustic Logic also note the Code should only apply to residential receivers. The ICNG is more appropriate for non-residential receivers. ▪ Condition 12 – the condition requires compliance with the Code. Full compliance with the Code criteria may not be feasible and reasonable. 	<p>Appendix B</p>

Summary of Issues Raised	Response	Supporting Documentation
	Hence, the Code recognises this in other conditions proposed by Council. The condition should be amended to be consistent with other conditions and typical practice.	
<p>Traffic and Transport</p> <p><i>To ensure there are no adverse traffic impacts during construction works, several conditions are recommended including the requirement for the preparation of a Construction Traffic Management plan. The conditions are provided at Attachment A.</i></p>	<p>Noted.</p> <p>The Applicant will prepare a Construction Traffic and Pedestrian Management prior to the issue of a Construction Certificate in accordance with conditions of consent.</p>	N/A

4.3. RESPONSE TO GOVERNMENT AGENCY COMMENTS

Table 5 Government Agencies

Summary of Issues Raised	Response	Supporting Documentation
DPE ENVIRONMENT AND HERITAGE GROUP		
<p>Flood Risk Management</p> <p><i>No permanent above ground construction is proposed, but bunding, earth mounds and stockpiles are proposed. These could influence flood behaviour, especially considering that the bunding is intended to reroute surface flows.</i></p>	<p>The installation of temporary bunding and site works will ensure there is no impact on current overland flows. In the future, the contractor will need to ensure that stormwater management is adequately addressed within the final Construction Environmental Management Plan (CEMP) in response to relevant conditions of consent.</p> <p>The revised Preliminary CEMP prepared by Aqualand states that the proposed development will implement best practice measures recommended, including:</p>	<p>Appendix D</p> <p>Appendix I</p>

Summary of Issues Raised	Response	Supporting Documentation
	<ul style="list-style-type: none"> ▪ Completion of drainage diversion works diverting stormwater that is currently piped through Central Barangaroo (the site) from external catchments. ▪ Development of appropriate water quality objectives for the discharge of stormwater from site. ▪ A rigorous bunding and monitoring protocol that will ensure that all rain falling on potentially contaminated areas of the site during construction (e.g. construction excavations, earth mounds and stockpiles, contaminated machinery) can be collected for treatment prior to disposal. 	
<p><i>Drainage diversion works are proposed to convey runoff from external catchments. The proposed drainage diversion is over 200m long, resulting in a much longer length of pipe than under present conditions. This is therefore not necessarily equivalent, in terms of hydraulic capacity, to existing conditions. No modelling has been provided to demonstrate equivalence for smaller stormwater events or larger flooding events.</i></p>	<p>Warren Smith is of the view the downstream inverts connecting into the harbour are fixed and cannot be lowered to facilitate a steeper pipe grade.</p> <p>A hydraulic analysis will be undertaken during the future detailed design phase of the project to ensure that there are no adverse flooding impacts associated with smaller or larger events.</p> <p>The Applicant accepts a condition requiring a hydraulic analysis prior to commencement of works.</p>	<p>Appendix D</p>
<p><i>The report indicates (without evidence) that only the 2% AEP event flow would be accommodated due to lack of downstream capacity. There is no discussion or consideration of larger events such as the 1% AEP flood or PMF.</i></p>	<p>Additional flood analysis will be undertaken during the future detailed design phase. This will include assessment of a full range of flooding such as the 1% AEP and PMF events. Any potential capacity limits will be clearly identified, and a final design solution will be developed accordingly. This is acceptable noting the minor extent of early works proposed under this SSSA. In addition, approval will be sought for more extensive site-wide works in the future.</p>	<p>Appendix D</p>

Summary of Issues Raised	Response	Supporting Documentation
<p><i>The proposed early works have a planned total timeframe of 14-17 months. However, no timeframe was provided for completion of the final works, which is expected to be much longer. Therefore, it is unclear how long the proposed drainage diversion works would be in place.</i></p>	<p>The timeframe for completion of the final works is yet to be determined based on the final design solution and staging of the works along Hickson Road.</p> <p>INSW has indicated the Hickson Road upgrade works are currently expected to be complete in late 2025.</p>	<p>Appendix A</p>
<p><i>There is no indication that the final drainage works would be different from this temporary proposal. Indeed, it would be prudent to investigate a potential final option. It may not be necessary to alter the stormwater drainage configuration again for the final stage. Possible final options are not presented in the report.</i></p>	<p>INSW are responsible for delivering permanent diversion of stormwater drainage for the precinct. INSW are currently assessing options and coordinating the final design of drainage works.</p> <p>The Applicant will provide temporary diversion as outlined within the EIS and supporting documentation if required.</p>	<p>Appendix D</p>
<p><i>EHG advises that the SEARs have not been addressed. Flooding behaviour under proposed conditions has not been identified. Therefore, EHG recommends the following:</i></p> <ul style="list-style-type: none"> ▪ <i>Flood modelling of the drainage upgrade, noting that this may become permanent and equivalent hydraulic capacity has not been demonstrated.</i> ▪ <i>Mitigation of the impacts of the drainage diversion on flooding or a design that does not cause adverse impacts.</i> 	<p>As outlined previously in response to DPE's comments, additional flood modelling, analysis and report will be undertaken as part of the future detailed design phase of the project.</p> <p>This will include flood modelling of the final drainage upgrades and hydraulic analysis which considers flood events up to the PMF. Mitigation measures will be identified and implemented as required.</p>	<p>Appendix D</p>

Summary of Issues Raised	Response	Supporting Documentation
<ul style="list-style-type: none"> ▪ <i>Consideration of the full range of flooding up to the PMF.</i> 		
<p><i>An amended BDAR waiver request that includes the additional works identified in the EIS is therefore required to be submitted.</i></p>	<p>An amended BDAR Waiver Request was submitted to DPE and EHG on 13 October 2023. An updated BDAR Waiver was granted by DPE on 9 November 2023.</p>	<p>Appendix L</p>
<p>NSW ENVIRONMENT PROTECTION AUTHORITY (EPA)</p>		
<p><i>The EPA has no comments to provide on this project and no-follow up consultation is required.</i></p>	<p>Noted.</p>	<p>N/A</p>
<p>HERITAGE NSW</p>		
<p><i>Non-Aboriginal Archaeology</i></p> <p><i>The proposed early works are confined to the south-east corner of the subject area at the boundary with Hickson Road (the ‘zone of impact’).</i></p> <p><i>Significant archaeological resources may be retained within the zone of impact all relate to the Phase 2 occupation (1820s – 1870s). This includes physical evidence of 19th century land reclamations, such as retaining walls and infill; structural remains of Thomas Agars’ and David Cureton’s wharves and buildings; and structures associated with Miller’s ship-building operation.</i></p>	<p>Noted.</p>	<p>N/A</p>
<p><i>There is moderate potential for this archaeological resource to be present, and it has been assessed</i></p>	<p>Noted.</p>	<p>N/A</p>

Summary of Issues Raised	Response	Supporting Documentation
<i>as being of local heritage significance due to its research potential.</i>		
<i>The proposed works are likely to destroy any archaeological resource within the zone of impact.</i>	Noted.	N/A
<i>The recommendation of the Historic Archaeological Assessment prepared by Urbis to undertake an archaeological monitoring and excavation program within the zone of impact to mitigate the loss of this resource is supported.</i>	Noted. It is anticipated that these recommendations will be included as conditions of consent.	N/A
<i>An archaeological research design (ARD) and methodology should be developed to investigate and record the archaeological resource and contribute to a heritage interpretation plan for the site. The ARD and methodology should detail a procedure for the unexpected event that State significant relics are identified.</i>	Noted. Recommendations within the Historical Archaeological Assessment (HAA) accompanying the EIS included preparation of an Archaeological Research Design and Methodology.	N/A
<p>Maritime Archaeology</p> <p><i>The EIS should be supported by an appropriately authored Maritime Archaeological Assessment. This should address the following:</i></p> <ul style="list-style-type: none"> ▪ <i>Comprehensive assessment of the potential of this site for archaeological relics or resources including assessment of the level of significance.</i> 	<p>A Maritime Archaeological Assessment (MAA) has been prepared by Mountains Heritage to accompany this Submissions Report.</p> <p>Based on historical research and a review of previous archaeological investigations undertaken in the Barangaroo area, the MAA summarises the following:</p> <ul style="list-style-type: none"> ▪ The site has moderate potential for maritime archaeological remains. ▪ There is potential for early shipbuilding remains at the northern end of the site where associated overwater repair and fit out work took place. 	<p>Appendix E</p> <p>HAA previously submitted with the EIS.</p>

Summary of Issues Raised	Response	Supporting Documentation
<ul style="list-style-type: none"> ▪ <i>Specific processes for the treatment of any newly-discovered archaeological sites, prior to the commencement of any works at the site, specifically how they would be:</i> <ul style="list-style-type: none"> – <i>investigated;</i> – <i>recorded;</i> – <i>conserved (including long term conservation and storage of relics and archival lodgement of the results of recording and investigations);</i> – <i>interpreted (i.e., meaningful incorporation of this heritage into the proposed public domain, including landscaping, artwork and internal heritage interpretation in publicly-accessible areas of the development. This will ensure future users and visitors are aware of this hidden waterfront heritage and would add greatly to the public benefit and enjoyment from redevelopment of the site. These works should be undertaken in accordance with current Heritage Council standards and guidelines where they apply.)</i> 	<ul style="list-style-type: none"> ▪ The potential for shipwrecks in the subject site is considered low. However, the discovery of the UDHB1 'Barangaroo Boat' immediately adjacent to the subject site highlights the potential for unrecorded shipwrecks to be in the area. ▪ Substantially intact archaeological remains relating to shipwrecks or shipbuilding dating from pre-1850s, including both structural remains and maritime archaeological deposits, are likely to be State significant. ▪ Any structural remains associated with the post-1850s era, including the expansion of Dibb's shipbuilding yard, McLean's Wharf, and the post 1900 resumption wharves, and their associated maritime archaeological deposits, would likely be of local heritage significance. ▪ The proposed construction has the potential to directly impact maritime archaeological remains associated with the earliest phases of historical use at the subject site not previously impacted by remediation works. This includes remains associated with Agars' Wharf (1830s) and Cureton's Wharf (1840s). The northern section of the proposed secant wall would also pass along the former foreshore area of Darling Harbour. <p>Recommendations have been provided in the previous HAA accompanying the EIS and the MAA accompanying this RTS package. These documents outline the process for the treatment of any new archaeological sites and unexpected finds protocols. These will be guided by the Archaeological Research Design and Excavation Methodology (ARD&EM). This document will provide management strategies to deal with any and all maritime archaeological finds.</p>	

Summary of Issues Raised	Response	Supporting Documentation
<p><i>Demolition works and any proposed excavation works should be monitored by a suitably qualified and experienced maritime archaeologist. There should be clear indication of what will be done if unexpected sites are discovered during the demolition process and how they will be recorded and or excavated, the conservation techniques to be employed, and if in situ preservation and interpretation can be undertaken.</i></p>	<p>As summarised above, the MAA states that the maritime archaeologist to assist with the archaeological excavation and monitoring works for early works at Central Barangaroo must provide input into the detailed ARD&EM.</p> <p>The location for archaeological testing and monitoring will concentrate on areas where State significant maritime archaeological relics and deposits may be present.</p> <p>Depending on the results of testing, archaeological monitoring should also be conducted across the remainder of the works site. This will determine the presence and extent of the maritime archaeological remains, and also the potential for undocumented early shipwrecks along the former foreshore of Darling Harbour.</p> <p>The ARD&M should include a methodology and treatment for unexpected maritime archaeological finds.</p>	<p>Appendix E</p>
<p>Aboriginal Cultural Heritage Assessment Report</p> <p><i>Heritage NSW would recommend the implementation of the unexpected finds protocol outlined in the ACHAR.</i></p>	<p>Noted.</p> <p>It is anticipated that a condition of consent will be included as per the recommendations of the Historical Archaeological Assessment supporting the SSSA (including an unexpected finds protocol).</p>	<p>N/A</p>
<p>SYDNEY METRO</p>		
<p>Rail Corridor Protection</p> <p><i>a) An electrolysis assessment in accordance with the Sydney Metro Underground Corridor Protection</i></p>	<p>An Electrolysis Risk Report (ERR) has been prepared and provided to Sydney Metro which considers Section 9.4 of the Sydney Metro Corridor Protection Technical Guidelines.</p>	<p>Appendix H</p>

Summary of Issues Raised	Response	Supporting Documentation
<i>Technical Guidelines (available at sydneymetro.info).</i>	As outlined in Section 3.1 of this Report, Sydney Metro confirmed on 6 October 2023 that they are satisfied with the Electrolysis Risk Report submitted.	
<i>b) Evidence demonstrating how the detailed design toe levels will remain above the tunnel crown level.</i>	<p>The wall will be constructed to the west of the boundary between Sydney Metro and the Central Barangaroo site. The proposed shoring system will have an approximate diameter of 1,200mm (maximum) and will be socketed in the bedrock. The toe will be no lower than RL -14.9. The Sydney Metro tunnel crown level sits at approximately RL -16.17, which is lower than the anticipated lowest pile toe level. The application will ensure efforts are made to lift the pile toe levels above RL -14.9. This will be confirmed during the detailed design.</p> <p>The secant piles will be founded in Class III sandstone or better. Therefore, the drilling of these piles will progress in a controlled manner, thus offering good control on the pile toe termination elevations.</p> <p>Further, the tunnel alignment deviates eastward away from the proposed secant pile wall towards the south, thus creating a greater east-west separation distance between the two structures.</p> <p>In accordance with the 'Sydney Metro Underground Protection Guidelines (and at Sydney Metro's request), the Surveyor Rygate has prepared a mark-up of the Eastern Section plan (section A-A and section B-B) which identifies the first and second protection reserves around the metro underground infrastructure with respect to the proposed wall.</p> <p>The proposed wall sits inside the property boundary and outside of the first protection reserve which stops at the property boundary.</p>	<p>Appendix F</p> <p>Appendix J</p>
<i>c) Evidence demonstrating there will be no significant vertical loads applied to the pile wall.</i>	The Geotechnical Engineering Letter prepared Tetra Tech Coffey and Structural Statement prepared by Robert Bird Group confirms that the secant	<p>Appendix F</p> <p>Appendix G</p>

Summary of Issues Raised	Response	Supporting Documentation
	<p>pile wall will be a temporary structure. Thus, it will only receive minor vertical loads in the temporary condition.</p> <p>The basement will be structurally arranged for the permanent condition to direct all major vertical loads away from the secant pile wall to inboard columns/walls. This ensures the wall will only receive minor vertical loads permanently. Further, Robert Bird Group note that:</p> <ul style="list-style-type: none"> ▪ The “hard” piles of the secant pile wall will be constructed with a concrete strength notionally of $f'c=50\text{MPa}$ and a minimum cover of 50mm. The “soft” piles are not reinforced. ▪ The capping beam for the secant pile wall will be constructed with a concrete strength notionally of $f'c=50\text{MPa}$ and a minimum cover of 50mm. <p>Sydney Metro confirmed via email on 12 September 2023 that the additional information submitted is sufficient and item (c) is closed out (refer Section 3.1).</p>	
<p><i>d) Figure 8 (Preliminary Site Establishment Plan) of the EIS erroneously considers the current temporary construction stage Hickson Road alignment (i.e. blue directional arrows) and does not consider the final permanent Hickson Road alignment being delivered by Sydney Metro as expected to be complete at the time of the proposed SSD works. Sydney Metro therefore request that the EIS be amended to reflect the final Hickson Road alignment.</i></p>	<p>The Applicant has updated the Preliminary Site Establishment Plan contained in Section 2.3 of the revised CEMP (refer Figure 5 of Appendix I). This reflects the latest publicly available information for the Hickson Road design and alignment anticipated to be in place at the time works commence on site.</p> <p>As noted in the letter provided INSW, the final Hickson Road upgrade works are scheduled for completion in late 2025.</p> <p>Sydney Metro confirmed via email on 10 October 2023 that the plan submitted was satisfactory and item (d) is closed out (refer Section 3.1).</p>	<p>Appendix I</p>

Summary of Issues Raised	Response	Supporting Documentation
<p>Transport Planning</p> <p><i>Sydney Metro will have completed delivery of Street D to a width of 5m for one way traffic prior to when proposed construction works are expected to commence. However, the proposed Figure 8 - Preliminary Site Establishment Plan indicates two-way traffic, which would require a construction access gate wider than 5m and is assumed to be extended south of Street D. This would impact the western footpath and public domain works delivered by Sydney Metro along Hickson Road. Therefore, the proponent will have to seek alternative construction access.</i></p>	<p>As outlined above, an updated Site Establishment Plan is provided in Section 2.3 of the revised preliminary CEMP. The updated preliminary plan indicates one-way construction vehicle access into/out of and throughout the site.</p>	<p>Appendix I</p>
<p><i>The emergency vehicle entry/exit gate and crossover conflicts with future northern footpath of Barton St.</i></p>	<p>The emergency vehicle access has been retained in this location. It is deemed the most suitable location noting that construction vehicle access and egress will occur off Hickson Road and Harbour Park will be developed in the near future. The layback will be of sufficient quality to remain trafficable by pedestrians, in the unlikely event that works are halted for any significant period.</p> <p>The Central Barangaroo Precinct is already well managed and isolated in terms of public access and protection, with an existing A-class hoarding around the full extent of the site. Pedestrian movement around the site will be managed by traffic controllers.</p>	<p>Appendix I</p>
<p><i>Traffic and pedestrian movement management is required at construction vehicle access points to ensure the access and safety of pedestrian walking</i></p>	<p>Vehicles entering or exiting the site will do so under management of a traffic controller to maintain public protection, in accordance with the Traffic Guidance Scheme in the CTMP, prepared by Stantec (refer section 3.2).</p>	<p>Appendix I</p>

Summary of Issues Raised	Response	Supporting Documentation
<i>to and from Barangaroo Metro station along Hickson Rd western footpath.</i>	Existing pedestrian footpaths and crossings are proposed to be maintained outside of the development site.	
<i>The Transport Impact Assessment states entrance gates, (the existing Gate H4 and Street 'D' gate along Hickson Road) will be managed with traffic controllers. Sydney Metro supports this approach to manage potential impacts to pedestrian access and safety.</i>	Noted	N/A
TRANSPORT FOR NEW SOUTH WALES (TFNSW)		
<i>It is suggested that the applicant be conditioned to prepare a detailed Construction Pedestrian Traffic Management Plan (CPTMP) in consultation with TfNSW. A copy of the final CPTMP should be submitted to TfNSW for endorsement, prior to the issue of any construction certificate.</i>	Noted.	N/A
<i>Prior to the issue of any construction certificate, the applicant shall prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with TfNSW and submit a copy of the final plan to TfNSW for endorsement via development.CTMP.CJP@transport.nsw.gov.au</i>	Noted	N/A

Summary of Issues Raised	Response	Supporting Documentation
AUSGRID		
<p><i>Ausgrid requires that due consideration be given to the compatibility of proposed development with existing Ausgrid infrastructure, particularly in relation to risks of electrocution, fire risks, Electric & Magnetic Fields (EMFs), noise, visual amenity and other matters that may impact on Ausgrid or the development.</i></p>	Noted	N/A
<p><i>Ausgrid notes there is a requirement for removal of existing Ausgrid assets positioned within the site and new electrical connections including Kiosk substations are required to supply the development. Ausgrid recommends the proponent to make the necessary connection application to Ausgrid as soon as practicable.</i></p>	Noted – the Applicant will make the necessary application to Ausgrid in the near future following approval of this SSDA.	N/A
<p><i>The applicant must check the location of underground cables by using Before You Dig Australia (BYDA) and comply with the requirements of Ausgrid Network standard 156: Working Near or Around Underground Cables.</i></p>	Noted	N/A
DPE Water		
<p>Groundwater Inflow – RFI Request</p> <p><i>Insufficient information has been provided to confirm the potential groundwater inflow volumes</i></p>	No significant water drawdowns are proposed as part of Early Works Phase 1.	

Summary of Issues Raised	Response	Supporting Documentation
<p>during construction and operation. Ensure the proponent quantifies the maximum annual volume of water take due to aquifer interference activities required for the project and demonstrate sufficient entitlement can be acquired in the relevant water source unless an exemption applies.</p>	<p>Bulk/detailed excavation and de-watering will form part of the future Early Works Phase 2 SSDA project which will seek approval bulk earthworks to support the future basement structure.</p>	
<p>CEMP</p> <p>That the proponent prepares a Construction Environmental Management Plan in accordance with industry standards including the guideline, Managing Urban Stormwater: Soils and Construction (Landcom 2004).</p>	<p>Noted.</p> <p>A Preliminary CEMP has been prepared to assist with outlining the likely approach to managing construction related matters for the works.</p> <p>A Final CEMP will be prepared prior to the commencement of works in accordance with relevant conditions of consent.</p>	<p>Appendix I</p>
<p>SYDNEY WATER</p>		
<p>The Applicant must confirm if the ultimate development plan at this site requires relocation of pump station SP1129. If relocation of SP1129 is required as part of future development plans, then an Options Study for relocation of the pump station should be carried out up front. The preferred option for the final location of SP1129 must be endorsed by Sydney Water before early works construction activity on the site can begin. Sydney Water cannot support SSD-39587022 until it is confirmed that SP1129 will not require relocation or until a preferred option for relocation has been endorsed by Sydney Water.</p>	<p>There is currently no intention to relocate the pumpstation as part of the proposed early works.</p> <p>A Building Over and Adjacent (BOA) application will be lodged with Sydney Water by the Water Services Coordinator (WSC) engaged as part of the project in response to relevant conditions of consent.</p> <p>A Specialist Engineering Assessment (SEA) was undertaken as part of the SSDA and it is anticipated that the pump station will be relocated as part of the future main works.</p>	<p>Appendix A</p> <p>Appendix D</p>

Summary of Issues Raised	Response	Supporting Documentation
<p>Sydney Water notes no relocation of SP1129 is proposed as part of SSD-39587022 however the decision on the pump station relocation is critical as it will impact the ultimate development plan. Sydney Water requests that the project team present an update of the build program including the early works package to facilitate early stakeholder engagement for the critical interfaces in question. Early engagement with us before the submission of Sydney Water applications is critical.</p>	<p>Aqualand and the project team has been engaging with Sydney Water regarding the relocation of SP1129. At this stage the proposed relocation options assessment is being finalised with INSW and will be tabled with Sydney Water for review and acceptance.</p> <p>INSW has advised this is currently programmed for late 2023.</p>	<p>Appendix A Appendix D</p>
<p>The interface between proposed early works and Sydney Water assets must be managed in accordance with Sydney Water's Technical Guidelines: Building over and adjacent to pipe assets. The works in question appear to be within the zone of influence of multiple Sydney Water assets. This will require Building Plan Approval applications with the support of specialist engineering assessments to identify the risk of loading on the early works to our assets.</p>	<p>The Applicant has engaged WSCE as their Water Services Coordinator (WSC). Relevant Sydney Water guidelines will be adhered to for any proposed infrastructure that is planned to be constructed within the zone of influence of the Pump Station asset.</p>	<p>Appendix A Appendix D</p>
<p>The Building Plan Approval applications will also require the project team to demonstrate sufficient operational requirements which include but is not limited to access requirements in relation to early works build, and long-term operational considerations for new built form and the impact to existing assets.</p>	<p>Noted. Any changes to Sydney Water's existing access arrangements will be discussed with them prior to implementation and will be clearly outlined in any Building Over and Adjacent (BOA) application.</p> <p>Long-term operational considerations will be considered as part of future SSDA's for the basement structure to ensure potential impacts to existing assets are addressed.</p>	<p>Appendix A Appendix D</p>

Summary of Issues Raised	Response	Supporting Documentation
<p>The early works have a critical interface with Sydney Water Pumping station (SP1129). The Building Plan Approval application must demonstrate that the asset is protected through construction of the early works via the submission of engineering packages which comply to Sydney Water's engineering competency standards. The packages must also demonstrate operational requirements which include but are not limited to 24/7 access through construction of early works and post early works.</p>	<p>As previously discussed, Aqualand has engaged a Water Services Coordinator (WSC) to address relevant Sydney Water guidelines for any proposed infrastructure works within the zone of influence of the asset. This will include the submission of engineering drawings in the BOA application, whereby conditions will be imposed by Sydney Water for the construction works to adhere to.</p> <p>Any changes to current access arrangements will be agreed to with Sydney Water prior to implementation.</p>	<p>Appendix A Appendix D</p>
<p>Sydney Water is working on a long-term strategic outlook for a number of pump stations within the CBD area, including SP1129. The early works package should be informed around Sydney Water's long-term approach for the pump station in question. Space Proofing of future corridors is currently being investigated by Sydney Water. More information can be provided to help inform the early works design and subsequent design stages to align with Sydney Waters strategic objective for the pump stations within the city area.</p>	<p>Any additional information relating to the planned Sydney Water strategic plan will be considered in the future for the SP1129 relocation design, prior to the commencement of any works. This will be picked up in consultation between the Applicant, INSW and Sydney Water.</p>	<p>Appendix A Appendix D</p>
<p>Next Steps</p> <p>If pump station SP1129 is proposed to be relocated, then it is recommended that an inception meeting is held with Sydney Water. We recommend that the proponent reaches out to</p>	<p>The Applicant and project team has been engaging with Sydney Water regarding the relocation of SP1129. At this stage the proposed relocation options assessment is being finalised with INSW and will be tabled with Sydney Water for review and acceptance.</p>	<p>Appendix A Appendix D</p>

Summary of Issues Raised	Response	Supporting Documentation
<p>Sydney Water as soon as possible to prevent any unnecessary delays to their programme.</p> <p>Following the inception meeting with Sydney Water, the proponent would need to undertake the Options Study for the relocation of SP1129.</p> <p>Once potential issues surrounding relocation of pump station SP1129 has been resolved, then the proponent can submit their Building Plan Approval application.</p>	<p>INSW has advised this is currently programmed for late 2023.</p>	

4.4. RESPONSE TO PUBLIC SUBMISSION(S)

Table 6 Public Submissions

Summary of Issues Raised	Response	Supporting Documentation
<p>Inadequate Community Consultation</p> <p>The proponent has elected to not undertake any level of consultation with local residents, deliberately depriving community members of the opportunity to both understand the project and provide feedback about aspects of the project.</p>	<p>The proposal relates to the construction of a 150m long secant pile wall located underground, as well as associated site establishment works.</p> <p>As outlined in Section 5 of the EIS, given the nature of works proposed, engagement undertaken to date has been focused on key government agencies and stakeholders regarding the technical design specifications and management measures.</p> <p>Community engagement will be undertaken post-approval and managed throughout the construction phase of the early works proposed. A Draft Community Relations Strategy was provided within the Engagement Report</p>	<p>N/A – refer to EIS and Engagement Report prepared by WSP supporting the SSDA.</p>

Summary of Issues Raised	Response	Supporting Documentation
	<p>supporting the SSDA and detailed the community engagement framework during construction.</p> <p>As outlined in Section 5.2.2 of the EIS, this will inform a future Community Relations Plan which will include strategies and program for community engagement/communications prior to commencing works and upon the commencement of works. This is also reflected in the revised Preliminary CEMP accompanying this Submissions Report.</p>	Appendix I
<p>Projects Strategic Alignment</p> <p>Request for additional information in relation to the proposal's alignment with the approved Concept Plan under MP06_0162 (as modified).</p>	<p>The proposed early works under this SSDA can be submitted under the current approved Concept Plan. The approved Concept Plan does not set any express parameters on the extent of excavation or early works within the site. Accordingly, the application is capable of satisfying the requirement for consistency with the approved Concept Plan (s4.24(2) of the <i>Environmental Planning and Assessment Act 1979 (EP&A Act)</i>).</p> <p>The proposed early works will not prevent or compromise the future development of the Central Barangaroo site consistent with the approved Concept Plan.</p>	N/A
<p>Construction Impacts</p> <p><i>Traffic and Transport</i></p> <p>There is limited on-site parking provided for the workers. No management plan or detailed mitigation measures as to how workers will be restricted from parking on local streets have been provided.</p>	<p>The revised Preliminary CEMP outlines that all staff employed by the Principal Contract (including sub-contractors) will undergo site induction. This will include details on the visitor parking arrangements and the extensive public transport opportunities available for people to access to/from the work site.</p> <p>Site parking is provided for up to 20 staff. The remainder of staff will be encouraged to access the work site via the various public transport modes available in proximity to the site.</p>	Appendix I

Summary of Issues Raised	Response	Supporting Documentation
<p>The cumulative impacts from the number of trucks servicing the site have not been appropriately addressed.</p>	<p>The Traffic, Transport and Accessibility Assessment (prepared by Stantec accompanying the early works SSDA) and the Preliminary CEMP provide an assessment of anticipated transport implications including potential cumulative impacts when considering existing and future nearby developments. Notably, the Barangaroo Metro Station and One Sydney Harbour.</p> <p>The cumulative impacts of the proposed early works and the surrounding developments will be managed to ensure that the additional six to eight trucks per hour generated by the early works will not materially impact the surrounding road network.</p>	<p>Appendix I</p>
<p><i>Noise and Vibration</i></p> <p>Requests DPE to seek further detailed construction processes and adequate mitigation measures to ensure that the noise exceedance is not as high as it currently is.</p>	<p>The Acoustic Impact Assessment and Preliminary CEMP assessed noise and vibration impacts during the proposed construction activities based on the expected construction methodology.</p> <p>As the assessment indicated exceedances of noise management levels may occur, Acoustic Logic recommended a detailed noise assessment and construction noise and vibration management plan be prepared prior to the commencement of any works. This will investigate whether additional noise control measures need to be implemented to further mitigate noise impacts on sensitive receivers once further details on the construction methodology are known (i.e. once a contractor is appointed).</p> <p>Regardless, noise emissions from the proposed works are expected to be less than those occurring from other existing (or recently completed) construction activities in the Barangaroo precinct. Further, the Preliminary CEMP outlines restricted hours of work for high noise impacting activities associated with the early works. It is anticipated that these would form part of any consent issued.</p>	<p>Appendix C</p> <p>Appendix I</p>

Summary of Issues Raised	Response	Supporting Documentation
<p><i>Air Quality</i></p> <p>The level of dust soiling is a major health risk to neighbouring tenants and is concerning. No Construction Environmental Management Plan has been submitted to support the EIS. The high risk to residents is considered inappropriate.</p>	<p>This is incorrect. A Preliminary CEMP was submitted as part of the EIS (reference: Appendix W), as well as a Qualitative Air Quality Impact Assessment (reference: Appendix K).</p> <p>The Preliminary CEMP has been updated and supports this Submissions Report. Section 3.5 sets out the air quality management and mitigation strategies for the proposed construction activities in line with the Air Quality assessment prepared by EDP as part of the EIS.</p>	<p>Appendix I</p>

5. UPDATED PROJECT JUSTIFICATION

The proposed development has been assessed with regard to the matters for consideration under section 4.15 of the EP&A Act and the SEARs issued by DPE. We conclude that the proposed development is consistent with the original design documentation and can therefore continue to be supported.

No additional mitigation measures have been proposed as a result of the revised technical reports. A response was only required to the technical queries raised during the exhibition period and noted in **Section 4**. The mitigation measures of the proposed development have been re-attached for reference (refer **Appendix K**).

No design changes are required in response to issues raised in the submissions. Additional assessments were undertaken to address particular issues raised from relevant government agencies. These did not materially alter the impact of the development. As such, we reiterate the justification for the project as previously outlined in the EIS.

5.1. PROJECT DESIGN

The proposed early works are required to expedite an initial stage of early works activities for the Central Barangaroo precinct, along a short section of the site's interface with Hickson Road. These proposed works are required at an early stage to facilitate the coordinated design and delivery of the precinct and its neighbouring activities.

The structural and civil design of the proposed works is supportable as:

- The proposed works include the direct 'tie-in' interface with the delivery of Barangaroo Station undertaken by Sydney Metro.
- The proposal will provide stabilisation support to the Hickson Road surface for both the public domain improvement works and renewal of Hickson Road which will be undertaken by Infrastructure NSW, as well as the later precinct basement excavation works for Central Barangaroo which will be undertaken by the applicant under the terms of the approved Concept Plan.
- The proposed secant pile wall is located approximately 2.5m away from the outer edge of the existing Sydney Water sewer pump station (SP1129) and a temporary cased secant pile solution with temporary bracing will be implemented to ensure there are no impacts to the operation of the existing asset, ahead of its future relocation and upgrade as part of Hickson Road renewal works.
- The works will enable the removal of the redundant shoring wall that is not able to be integrated and is no longer required for its original temporary purpose of retaining Hickson Road during the EPA remediation works which occurred in 2018.
- Whilst alternatives for the proposed early works were considered by the applicant, the timing and physical interface dependencies of the works with the activities outlined above deem the proposed scope and staging the most appropriate and viable option for the site.

5.2. STRATEGIC CONTEXT

The proposal is consistent with state and local strategic planning policies.

The proposed works will play an important role in facilitating a significant city-shaping development outcome at Central Barangaroo. This application represents the first application for works within the Central Barangaroo site, which will be the final stage to be delivered in the broader, state significant Barangaroo precinct under the approved Concept Plan (MP06_0162). The proposal is the first step in the realisation of the considerable, decades-long investment in the western CBD harbour foreshore.

5.3. STATUTORY CONTEXT

The proposal satisfies the applicable local and State development controls:

- The proposed development has been assessed and designed in respect to the relevant objects of the EP&A Act as defined in Section 1.3 of the EP&A Act (refer to Appendix B of the EIS).
- This EIS has been prepared in accordance with the SEARs as required by Division 5 of Part 8 of the EP&A Regulation 2021.

- Consideration is given to the relevant matters for consideration as required under the BC Act. The SSD is supported by an updated BDAR Waiver issued by the delegate of the Planning Secretary within the DPE on 9 November 2023.
- This SSDA pathway has been undertaken in accordance with Schedule 2, Section 3 of the Planning Systems SEPP. The proposed development is classified as SSD given the cost of works exceeds the \$10 million CIV threshold, and the site is located in the Barangaroo precinct.
- The proposal complies with all of the relevant provisions in the Eastern Harbour Precincts SEPP as detailed in Appendix B of the EIS. The proposed development is permitted with consent in the B4 Mixed Use zone.
- The proposed development has been assessed in accordance with the Resilience and Hazards SEPP. The proposed development complies with the relevant clauses of the Resilience and Hazards SEPP, as the Remedial Works Plan at Appendix M (of the EIS) confirms the works will have minimal impact on the overall suitability of the site with respect to future land uses. A Long-Term Environmental Management Plan will be prepared at the conclusion of the complete remediation and validation of the entire Central Barangaroo site.

5.4. SUITABILITY OF THE SITE

The proposal is highly suitable for the site.

The suitability of the site for the delivery of a future mixed-use precinct was confirmed through the issuing of the Concept Approval MP06_0162. The early works are consistent with the terms of the Concept Approval and as such remain suitable for the site. Further, there are no significant environmental constraints that would limit the proposal from being constructed at the site.

5.5. PUBLIC INTEREST

The proposed development is considered in the public interest for the following reasons:

- The proposal is consistent with relevant State and local strategic plans and complies with the relevant State planning controls.
- No adverse environmental, social or economic impacts will result from the proposal.
- The proposal will achieve the following objectives:
 - Initiate early establishment works for the future mixed-use waterfront precinct development at Central Barangaroo in accordance with the approved Concept Plan (MP06_0162).
 - Effective management and mitigation of environmental impacts, including disruptions to neighbouring businesses, residents and visitors, as well as minimising construction impacts of the adjoining Barangaroo Station to ensure liveability is retained.
 - Contribute towards the strengthening of the Harbour CBD by enabling early works that will facilitate future mixed use development which will provide a significant increase in employment-generating floor space, housing, cultural uses and open space opportunities in Barangaroo.
- The issues identified during the stakeholder engagement with the relevant agencies have been addressed in the technical reports appended to this EIS, and the identification of mitigation measures in Appendix K, and this Submissions Report.

Having considered all relevant matters, there will be no additional environmental impacts as a result of the proposed clarifications.

On this basis, the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A

INFRASTRUCTURE NSW LETTER

APPENDIX B

ACOUSTIC RESPONSE LETTER

APPENDIX C

**ACOUSTIC IMPACT ASSESSMENT
(REVISED)**

APPENDIX D

**STORMWATER MANAGEMENT AND
FLOODING (CIVIL) LETTER**

APPENDIX E

MARITIME ARCHAEOLOGICAL ASSESSMENT

APPENDIX F

GEOTECHNICAL ENGINEERING LETTER

APPENDIX G

STRUCTURAL STATEMENT

APPENDIX H

ELECTROLYSIS RISK REPORT

APPENDIX I

**PRELIMINARY CONSTRUCTION
ENVIRONMENTAL MANAGEMENT
PLAN**

APPENDIX J

**SYDNEY METRO RESERVES SURVEYED
DRAWING**

APPENDIX K

MITIGATION MEASURES

APPENDIX L

UPDATED BDAR WAIVER

