

21 November 2019

16009

Emily Dickson
Senior Planning Officer
Department of Planning, Industry and Environment
320 Pitt Street
Sydney NSW 2000

Dear Emily,

**SSD 7484 – MODIFICATION 4 RESPONSE TO SECOND REQUEST FOR FURTHER INFORMATION
23-33 & 35-39 BRIDGE STREET, SYDNEY – THE SANDSTONE PRECINCT**

This Response to Second Request for Further Information has been prepared by Ethos Urban on behalf of Pontiac Land Australia (Pontiac) to address comments from the Department of Planning, Industry and Environment (DPIE) relating to modification application (Mod 4) to State Significant Development 7484 (SSD 7484) which relates to the development of tourist and visitor accommodation at the Sandstone Precinct, Sydney. Additional comments were also received from authorities.

The Section 4.55(2) modification application submitted as Modification 4 was lodged on 28 June 2019 and includes:

- Modifying the internal layout of the Lands Building through removal of 61 guest rooms;
- Introduction of hotel amenities into the Lands Building including:
 - Food and beverage offerings and associated kitchen spaces;
 - Consolidation of bathroom facilities;
 - Business suites;
 - Library and lounge;
 - Event and function rooms; and
 - Activation of the strong room.
- Removal of the previously proposed diagrid at terrace level and extension of existing roof style across new internal walkways, including changes to materials; and
- Creation of publicly accessible terrace spaces and access into the northern dome, including a new mezzanine level.

This response is supported by a letter from Hassell at **Attachment A**.

1.0 Request for Further Information and Response to submissions

The DPIE issued a second Request for Further Information dated 7 November 2019, which has been responded to in **Table 1** below, and additional comments were received by Transport for NSW, Heritage Council of NSW, Environment, Energy and Science (EES) and the City of Sydney, also responded to below.

Each comment has been reviewed by the project team and specialist consultants and the below responses

Table 1 Responses to Agency Commentary

Department of Planning, Industry and Environment	Response
Identify the proposed sound level of piped music and live music, noting the submitted Acoustic Report, prepared by Wood & Grieve Engineers dated 16/10/2019 indicates background music played at 60dB(A)	The proposed maximum sound level for piped music is 60dBA on the outdoor terraces. For clarity, no live music will be played on the outdoor terraces, with live music only to be played inside the building. Only background music would be played on the terraces. Live music, which will only be played inside could include a band, DJ, acoustic guitar amongst other live music acts consistent with other entertainment venues in the CBD.
Clarify how sound levels will be reduced after 10pm	
Provide further detail of the type of live music proposed	
City of Sydney	Response
The applicant's response regarding heritage concerns raised by the City are sufficient.	Noted.
The City reiterates its request for any demolition, construction and operational waste management plans to be prepared in accordance with the City's Guidelines for Waste Management in New Development by way of condition of consent.	Noted. Waste will continue to be managed generally in accordance with Council requirements, as per conditions of consent.
The City notes the proposed trading hours for the roof terraces will be from 7am to midnight every night. It is recommended that, in accordance with the City's Late Night Trading Management controls (Section 3.15.4 of the Sydney Development Control Plan 2012) that outdoor trading be permitted from 7am to 10pm with extended trading to midnight on a trial basis.	Noted. Approval is however sought for use of the external terraces until midnight on a permanent basis. WGE advise that use of the terraces until midnight (subject to implementation of appropriate management measures, namely limiting occupation numbers and only playing background music) will achieve compliance with all applicable acoustic codes. There is accordingly not considered to be any need to adopt a trial period given the level of certainty around protection of surrounding amenity. It is also noted the original approval had no trial period imposed on the use of the external terrace, which also had approval for use until 2am.
Heritage Council of NSW	Response
Heritage NSW has reviewed the Response to Submissions and is satisfied that the Heritage Council's comments of 30 July 2019 have been noted by the applicant. No further conditions of consent are recommended for SSD 7484 MOD 4.	Noted.

Transport for NSW	Response
Passenger Pick Up and Drop Off It is requested that the applicant be conditioned to develop a Transport Access Guide in consultation with the Sydney Coordination Office within TfNSW to minimise the impact on bus stops and bus zones in the vicinity of the proposed development, prior to the occupation of the site. This Transport Access Guide must be implemented and maintained by the operators of the premises and be made available to staff, clients, customers and visitors at all times.	This recommendation and the draft condition for the preparation of the Transport Access Guide are accepted.
Freight and Servicing No further comments are provided as the response to submissions has adequately addressed the freight and servicing concerns.	Noted.
Construction Pedestrian and Traffic Management It is requested that the applicant be conditioned to update the TfNSW endorsed Construction Pedestrian and Traffic Management (CPTMP) prepared for main works to reflect the proposed modification and submit it to the Coordinator General, Transport Coordination for endorsement.	The CPTMP will be updated as required and submitted to the Coordinator General for endorsement.
Environment, Energy and Science	Response
Where the growing conditions in the courtyard and rooftop allow, it is recommended local native provenance plant species are used rather than exotic species and non-local native species.	See attached response from Hassell at Attachment A . In Hassell's view the use of a combination of local and non-endemic native species is in this situation considered to be appropriate given the context, plant profile, soil profile, solar access and heritage considerations.

In light of its merits and in the absence of significant environmental impact, we recommend that the proposed modification be supported by DPIE. We trust that this additional information in response to the further submissions received is sufficient to enable a prompt assessment of the proposed modification. Should you have any queries regarding the above do not hesitate to contact Alexis or Chris on 9956 6962.

Yours sincerely,

Alexis Cella
Director
02 9956 6962
acella@ethosurban.com

Ms Emily Dickson
Department of Planning, Industry & Environment
GPO Box 39
Sydney NSW 2001

19 November 2019

Dear Ms Dickson,

**EES comments: Sandstone Precinct Stage 2, SSD-7484 MOD 4
Response to Environment, Energy and Science Group (EES)**

In response to the EES comments recommending local native provenance plant species rather than exotic and non-endemic native species, please note below the context, plant profile, soil profile, solar access and heritage considerations which support the use of a combination of local and non-endemic native species.

Context

The endemic plant species of the Sandstone/ Sydney Cove precinct were a part of a complete ecological community - a naturally occurring group of native plants, animals and other organisms that are interacting in a unique habitat. Its structure, composition and distribution were determined by environmental factors such as soil type, position in the landscape, altitude, climate and water availability.

Plant community profile

The locally endemic plant communities of the Sandstone / Sydney Cove precinct were a combination of mudflats, exposed at low tide and Hawkesbury Sandstone slopes with woodland of *Eucalypt* and *Angophora* species.

Benson & Howell in 'Taken for Granted: The bushland and its Suburbs' describe the site as a "broad swampy basin... vegetation would have been an open woodland of spreading Scribbly Gums, *Eucalyptus racemosa*, with a shrubby understory with *Leptospermum flavescens*, *Banksia oblongifolia* and *Callistemon citrinus*... with thickets of mesic shrubs 6-8m high."

Soil profile

The Hawkesbury Sandstone plant communities grow in shallow, sandy and infertile soils very low in phosphorus. This soil condition results in the typical characteristics of the plant community - sclerophyllous plants with tough, often small or spiky leaves. Reinstating the endemic species of the Sydney Cove precinct would require reinstatement of sandy/ loamy/ sandy loam/ clay loam which have been heavily altered from original composition due to site development (including introduction of imported soil, deep soil compaction and highly increased soil nutrients). The original soil typology is suitable to a very limited number of plants and would highly restrict the overall plant palette used.

Solar access

Tree and groundcover species identified in the Hawesbury Sandstone community typically require a full sun position for health and vitality. The linear courtyards (7 x 26m) are situated 27m below roof level and consequently receive less than 2 hours of direct sunlight on the summer solstice – this is insufficient solar access to support the health of the endemic species mix.

A collection of shade tolerant endemic species from surrounding ecological communities have been incorporated into the courtyard design including *Adiantum*, *Asplenium*, *Brachyscome*, *Dendrobium*, *Ficus*, *Licuala*, *Lomandra*, *Pratia*, *Platycerium* and *Scaevola* species.

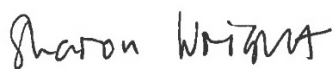
Heritage inspiration

Taking into account the challenging environmental conditions, the plant palette proposed is inspired by the local landscape as well as the building significant cultural heritage. At the time of construction (1873-1896) gardening was at its zenith – where “socially aspiring residents began to vie with each other to establish impressive mansions with elaborately ornamented gardens”. The style of the time is captured in the description of Clarens, Potts Point – “Clarens took its inspiration from ancient Greece, the plantings fulfilled the ambitions of all Victorian-era gardeners- exotic and rare plants from all corners of the globe formed a profusion of foliage and flowers”. (Sydney Living Museums, Secret Gardens of Sydney).

Many of Sydney’s secret gardens from the 1880’s have been lost or substantially destroyed. The design proposes to celebrate this landscape style by drawing from this garden style within the courtyards and terraces. The design proposes a highly diverse, ornamental and spectacular mix of plant species which aim to impress, delight and surprise visitors to the spaces.

We would request the recommendation is revised, taking into account the considerations of site suitability outlined above. Noting the design will aim to use species endemic to the surrounding Sydney Harbour foreshore ecologies in combination with other environmentally suitable species to deliver a quality landscape outcome.

Kind Regards,



Sharon Wright
HASSELL Principal, Head of Design, Landscape Architect