

18 December 2019

12255

Brendon Roberts
Team Leader – Key Sites Assessment
Department of Planning and Environment
320 Pitt Street
Sydney NSW 2000

ATTN: David Glasgow, Principal Planning Officer

Dear Brendon,

RE: REQUEST FOR ADDITIONAL INFORMATION – SSDA 7388 MOD 10

This submission has been prepared by Ethos Urban on behalf of Grocon (Darling Harbour) Developments (Grocon), in response to the Request for Additional Information (RFI) issued by the Department of Planning and Environment (DPE) on 25 November 2019, relating to SSDA 7388 MOD 10. SSDA 7388 MOD 10 seeks approval for a redesign of the SHFA building, modifications to the Porte Cochere (Ribbon building) form and material finish, modifications to the playground area and reconfiguration of bicycle parking, adjustment of public domain levels at the front of the building to provide stepped levels, and an adjustment of the approved signage zones.

This letter has been prepared in response to comments raised by the DPIE, City of Sydney, and Heritage NSW. It should be read in conjunction with the following documents:

- Revised Architectural Plans prepared by Hassell (**Attachment A**);
- Revised Public Domain Plans prepared by Aspect Studios (**Attachment B**);
- Wind Impact Statement prepared by VIPAC (**Attachment C**); and
- Construction, Pedestrian and Traffic Management Plan prepared by Grocon (**Attachment D**).

Table 1 over outlines the submissions and comments received and Grocon's proposed response. We trust that these responses and clarifications will assist with your assessment of the proposed modification. Should you have any queries about this matter or require any further information, please do not hesitate to contact me on 9956 6962.

Yours sincerely,



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Table 1 Response to DPIE RFI items

Item and Description	Response
SHFA Building	
<i>The submitted GFA calculations show a reduction in retail GFA, however the Modification Report and submitted floor plans propose an increase in retail GFA. Please clarify how the retail GFA has been calculated and provide a breakdown of the approved and proposed retail GFA for the SHFA building.</i>	Revised Architectural Plans have been prepared by Hassell at Attachment A rectifying the issue raised. A detailed GFA breakdown has been provided, there is a slight increase in the area of the retail contained within the SHFA building.
<i>The proposed elevations and sections of the SHFA building reference existing structures and materials despite all buildings on site having been demolished. Please provide clarification and amended elevations as necessary.</i>	The SHFA building has not been demolished and is still in operation as of the submission of this modification. The SHFA building is to be redeveloped at a later stage as part of SSD 7388 with some of the existing building structures to be reused and adapted.
<i>The proposed materials matrix (dated 19 June 2019 Revision D) indicates the reflectivity of materials has increased from 8% to 20%. Please amend this table to reflect the approved reflectivity or provide justification for the proposed increase in reflectivity and any changes to the proposed materials.</i>	The materials matrix has been updated and the reflectivity of materials has been reduced back to 8%, refer to Attachment A2 .
<i>Provide an illustrated materials schedule for the SHFA building.</i>	Revised Architectural Plans have been prepared by Hassell at Attachment A with an illustrated materials schedule for the SHFA building provided.
Public Domain	
<i>The public domain plans listed at page 20 of the Modification Report are not consistent with the submitted plans. Please review the listed and submitted plans to ensure consistency.</i>	The revision numbers for the public domain plans provided at page 20 of the Modification Report were erroneous. Notwithstanding the above, revised Public Domain Plans have been prepared by Aspect Studios at Attachment B and supersede those originally submitted with the application.
<i>A number of changes to the public domain, including the relocation of the Jay Flowers sculpture, have not been addressed in the Modification Report. Please provide public domain plans which clearly identify all proposed changes (highlighted/bubbled) and ensure all changes are addressed in the Modification Report.</i>	Revised Public Domain Plans have been prepared by Aspect Studios at Attachment B rectifying the issues raised. All of the proposed changes to the public domain were described in the original planning statement with the exception of the relocation of the Jay Flower. The proposed location has been the subject of discussions with SHFA and the proposed location has been approved.
<i>The proposed public domain plans include public art (the Kraken) which does not form part of the modification. Please remove all reference to this element from the submitted plans.</i>	Revised Public Domain Plans have been prepared by Aspect Studios at Attachment B with all references to the Kraken removed. Public art components of the proposed development are currently under consideration at the City of Sydney under D/2019/1231.

Item and Description	Response
The submitted Traffic Assessment Statement refers to changes in the loop road section of the forecourt adjacent to the Porte Cochere, however these changes are not referenced on the proposed plans or within the Modification Report. Please provide revised plans which clearly identify the proposed changes and ensure these changes are addressed in the modification report.	Changes to the 'loop' road section of the forecourt have been made as a result of a Transport for NSW request for the permanent closure of the southern loading dock access from Harbour Street. This therefore requires all vehicular access to now occur via the forecourt and associated 'loop' road, which has been reconfigured to accommodate up to a 8.8 metre medium rigid vehicle – see Figure 1:  Figure 1 Comparison between loop road configuration as approved (left) and as proposed (right) Source: GTA Consultants The proposed changes to the loop road are shown above. They are also reflected in the Traffic Statement prepared by GTA Consultants at Appendix I and the Architectural Plans prepared by Hassell at Appendix A of the submitted MOD 10 package.

Table 2 Response to City of Sydney RFI items

Item and Description	Response
Pedestrian Wind Environment	
<i>The proposal involves modifications to the façade of the SHFA building, resulting in a curved form along the western frontage. It is noted that the site experiences strong wind conditions. The modification application was not accompanied with a supporting wind impact statement, confirming that the proposed amendments to the façade would not adversely impact on the pedestrian and standing comfort levels already considered for the overall development.</i> <i>Therefore, consideration must be made to any impacts that the amended façade would have to local wind conditions and assurance that the proposal maintains satisfactory levels of pedestrian comfort, particularly within the public domain.</i>	A Wind Impact Assessment has been prepared by Vipac and is attached to this letter at Attachment C.
Addressing the Public Domain	
<i>It is encouraged that the proposed modifications to the western façade and the ground floor retains transparency and limit areas of concealment within the newly created recesses on the western elevation so as to maximise visibility to the internal uses at ground level.</i>	Noted.
Public Domain	
<i>Grading of footway is unclear. The proposal notes that the existing approved design has a 1:50 – 1:100 cross fall from the site boundary to the north, to the building line of The Ribbon. Terraced footways should consider appropriate cross-falls and drainage to prevent localised ponding on footways.</i> <i>Further, consideration should be given to the cluttering of the public domain and the reduction of clear passageways in this busy area. The width of the upper footway between the north elevation of the Ribbon building to the proposed public domain elements of seating and landscaping has a pinch point adjacent to the proposed outdoor dining areas. The proposed outdoor areas for the Ribbon building is subject to a separate Development Application (D/2019/1231) delegated to the City that is currently under assessment. It proposes outdoor seating widths of approximately 2.3m from the Ribbon building. The City recommends at least a minimum 4m footway width travel path be maintained for a clear path of travel between the proposed public domain embellishments and future outdoor seating zones.</i>	Revised public domain plans have been prepared by Aspect Studios at Attachment B with footway gradings clearly shown. A minimum 4 metre width is to be maintained across the site; this is more clearly delineated under the revised plans.

Item and Description	Response
<i>It is considered that the proposed modifications to the playground on the western portion of the site is generally acceptable. However, relocation of the palm groves and new seating elements orientated towards the harbour detracts from the usability of the space for events and the visibility of the City Screen that is referenced in the architectural plans. Consideration should be given to views to the screen and potential visual and physical barriers.</i>	Noted. The location of the palm groves and new seating elements have been provided specifically to facilitate a high degree of amenity at the site. As noted in the Public Domain Plans provided at Aspect Studios at Appendix C of the submitted MOD 10 package, the proposed additional seating along the northern edge will provide respite opportunities for pedestrians with appropriate views of the Harbour. The existing grove of palm trees have been moved to the western edge to specifically declutter the public realm, maximise pedestrian circulation, and improve views to the harbour. Significant spaces suitable for events are continued to be provided along the western edge, the design of which is rationalised to provide a large and permeable multi-used gathering place. The proposed configuration of the public domain is therefore considered to represent the highest and best use at the site.
<i>The site is located within the Darling Harbour Catchment and is flood prone. The proposed modifications include changes to the approved elevations and floor levels of the SFHA building. The amendments must be consistent with the required flood planning levels and comply with the City of Sydney Interim Floodplain Management Policy.</i>	Noted. The design of the building and public domain area will be consistent with the required flood planning levels and the City of Sydney Interim Flood Management Policy.
<i>The proposed relocation of the bicycle parking predominately retains visibility as well as a path of travel for pedestrians within the public domain and is supported. The City assumes that the provision of 176 bicycle parking spaces in the public domain does not alter or reduce from the required 239 bicycle spaces to be provided within the ground floor level of the podium as per Condition No. B10 of the Development Consent.</i>	The number of bicycle parking spaces at the site was previously adjusted under MOD 3 of SSD 7388. Under the approved changes, the minimum amount of bicycle parking spaces internally in the ground floor level was reduced from 239 to 32 for staff, whilst the number of visitor bicycle parking spaces in the public domain was increased from 56 to 176.
<i>Notwithstanding the above, it should be identified that the submitted Traffic Assessment Statement, prepared by GTA Consultants, makes reference to the “changes in the ‘loop’ road section of the forecourt”, and is resulted from requests from Transport for NSW. The submitted architectural plans and the Modification Statement do not make reference to this aspect of the porte cochere, which addresses the form and materiality only.</i> <i>In consideration of the above and the discrepancies in the submitted documentation, the City cannot comment on the loop road, should it be a component of this application. Further clarification should be sought from the applicant.</i>	Changes to the ‘loop’ road section of the forecourt have been made as a result of a Transport for NSW request for the permanent closure of the southern loading dock access from Harbour Street. This therefore requires all vehicular access to now occur via the forecourt and associated ‘loop’ road, which has been reconfigured to accommodate up to a 8.8 metre medium rigid vehicle, as shown in Figure 1 above. They are also reflected in the Traffic Statement prepared by GTA Consultants at Appendix I and the Architectural Plans prepared by Hassell at Appendix A of the submitted MOD 10 package.

Table 3 Response to Heritage Council of NSW RFI items

Item and Description	Response
<i>The modification primarily relates to design resolution and reconfiguration of the SHFA building. The intention of the public domain changes are to provide additional amenity and to maximise access to the waterfront edge with public seating and soft landscaping. The proposed modification will not alter the nature of the proposed development and the environmental/heritage impacts are substantially the same as the approved development. It is considered that previous comments provided in relation to this development are also valid for the amended proposal. Therefore, no further comment is provided at this stage.</i>	Noted.

Table 4 Response to Transport for NSW RFI items

Item and Description	Response
<i>It is requested that an updated Construction Pedestrian and Traffic Management Plan (CPTMP) be submitted for the above modification proposal to the Coordinator General, Transport Coordination for endorsement for any changes to the construction methodology proposed for the main works for the IMAX Redevelopment that would have the potential to impact on the general traffic and bus operation within the CBD.</i>	A Construction, Pedestrian and Traffic Management Plan (CPTMP) has been prepared by Grocon and is attached to this letter at Attachment D .

Table 5 Response to RMS

Item and Description	Response
<i>Roads and Maritime has reviewed the submitted application and raises the following concerns with the proposed development:</i> <i>Clearances/Encroachments: Roads and Maritime notes that the proposed modification will result in the Sydney Harbour Foreshore Authority (SHFA) building encroaching into the required 2m clearance from the Western Distributor/Cross City Tunnel infrastructure (i.e. the Cross City Tunnel ventilation stack). Contrary to the comment in the submitted modification report that “It is noted that, in areas where the proposed SHFA building encroaches the 2m clearance area, Western Distributor infrastructure can be accessed from an alternative location. This has been informally confirmed by RMS via email correspondence”, Roads and Maritime has not given any preliminary support for any encroachments.</i> <i>Roads and Maritime have consulted with the Cross City Tunnel (CCT) Concession holder, TransurbanCCT (TCCT), as they are responsible for the operation and maintenance of the CCT infrastructure. Roads and Maritime and TCCT are not supportive of the SHFA building encroaching within the 2m clearance zone around the CCT ventilation stack due to the extension of the SHFA building to the west (refer to Figures 6, 7 and 22 in the modification report). Roads and Maritime and TCCT request that a minimum 2,000mm clearance between the ventilation stack structure and the façade be maintained as per the original approved DA and as such the submitted plans be updated to clearly demonstrate the above has been achieved.</i>	The only part of the building that encroaches into the CCT stack exclusion zone is the spiral stairs which form part of the existing SHFA building and are to be retained as shown on the demolition clarification drawings at Attachment A. No amendments to the plan are therefore required.