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ABN 50 105 256 228

30 January 2020

Mr David Glasgow  
Principal Planning Officer  
Department of Planning, Industry and Environment  
320 Pitt Street, Sydney

Dear David,

## **RE: SSDA 9726 - ROYAL HALL OF INDUSTRIES - RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**

We are writing on behalf of Sydney Swans Limited (**the proponent**) to address the issues raised in your request for information (**RFI**), dated 16 December 2019 relating to State Significant Development Application (**SSDA**) 9726 at the Royal Hall of Industries, 1 Driver Avenue, Moore Park. In response to the additional information requested, further clarification is now provided in connection with the matters raised. We trust that this will assist your assessment of the SSDA.

The SSDA seeks consent for the development and operation of a multi-purpose sport and community facility at the Royal Hall of Industries (**the project**). The proposal seeks to adaptively reuse the Royal Hall of Industries, develop a two-storey high-performance sports building, and increase the permeability and amenity of the site through improvement to existing entries and public domain improvements.

The attached table outlines the matters raised by relevant agencies and a detailed response from the proponent. No significant design changes arise from the response to the RFI. As such, the project remains consistent with the statutory and strategic guidelines outlined and addressed within the Environmental Impact Statement, prepared by Urbis and dated June 2019.

In addition to the table, the following documentation is provided to support the proponent's response:

- Architectural Package and Amended Plans prepared by Populous (**Attachment A**);
- Revised Precinct Landscaping Plan prepared by Arcadia (**Attachment B**);
- Revised Landscape and Public Domain Plan prepared by Arcadia (**Attachment C**);
- ESD Memorandum prepared by Aurecon (**Attachment D**);
- Letter from GTA Transport Consultants dated 9<sup>th</sup> January 2020 (**Attachment E**);
- Arborist Response prepared by Allied Tree Consultancy dated 9<sup>th</sup> January 2020 (**Attachment F**);
- Tree Study Comparison prepared by Arcadia (**Attachment G**); and
- State Design Review Panel Meeting Notes 10<sup>th</sup> April 2019 (**Attachment H**).



We welcome the comments and have endeavoured to provide sufficient information for the Department of Planning, Industry and Environment (**DPIE**) to progress the assessment of the SSDA towards a positive determination.

Should you require any additional information or clarification, please do not hesitate to contact me on 8233 9901.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Nik Wheeler", written over a light grey rectangular background.

**Nik Wheeler**

Associate Director



Table 1 – Response to RFI

Agency Comments	Proponent Response
<b>Department of Planning, Industry and Environment</b>	
<p><i>NSB Building</i></p> <p><i>Reconsider the approach to the first-floor façade of the Errol Flynn Boulevard elevation including options to increase vertical articulation.</i></p>	<p>This matter is discussed in detail within <b>Attachment A</b>. The issue of vertical articulation on the New South Wales Swifts Building has been addressed through the addition of a new awning and vertical fins over the double height wall on the entry foyer of the building. This is designed to closely mimic the rhythm of the RHI's upper window mouldings.</p> <p>As such, this responds to previous comments made during the State Design Review Panel (SDRP) process seeking to articulate the administrative element of the building. These comments were initially recorded by Urbis in the meeting notes taken at the SDRP meeting on 10<sup>th</sup> April 2019 as per <b>Attachment H</b>.</p>
<p><i>Special events</i></p> <p><i>Clarify how the central multi-use space will accommodate special events (including Mardi Gras) including the likely availability of this space for full capacity events (e.g. weekends, out of season) taking into account the other community and club related uses proposed for this space, bump in/out requirements and the day to day operation of the building.</i></p> <p><i>Clarify the necessity and availability of "Terraplas" flooring and whether this, or other floor protection will be stored on site and be available for use by prospective users of the multi-use area.</i></p>	<p>The central multi-purpose space within the RHI has been designed in a flexible manner, to offer the opportunity to host a variety of events following the repurposing of the building. However, the space is primarily designed as an indoor space for sporting activities. On a typical basis, the space will be utilised by the Sydney Swans and the local community for professional training and sport-related uses.</p> <p>The use of the space for this purpose will be complemented by viewing areas available from the adjacent foyer and museum space, allowing the community to interact with professional AFL teams including the Sydney Swans, North East Australian Football League and a future Sydney Swans women's team. For these uses, along with use by community sporting clubs, there are no services or infrastructure required to set up the space. All sporting and training</p>



Agency Comments	Proponent Response
	<p>equipment will be appropriately stored in in the academy storage area, located on Ground Level adjacent to the multi-purpose field.</p> <p>For 'special events' there is flexibility for the central multi-purpose space to also accommodate a number of functions or events, in addition to the primary sporting use of the site. The central space has a patronage capacity of some 1000 visitors, enabling the retention of a significant community event space within the Eastern Suburbs, which represents a significant public benefit that is unique to the nature of the project.</p> <p>As events will be held on an irregular basis and subject to bookings, the conversion of the space to special event mode may require bump-in and bump-out activities. As the space can accommodate a range of varying events, the level of infrastructure required will depend on the nature and scale of the event. It is the expectation of the proponent that this additional infrastructure (including any flooring) will be provided by the event hirer, which means there is no requirement for additional storage on site.</p> <p>The space has also been designed with a large central LED screen and high-performance speakers, appropriate power requirement, data points and suitable air conditioning to accommodate a range of events, including presentations, dinners and conferences. Furthermore, events can also utilise the adjoining foyer, café and museum space, along with the option of utilising the commercial quality kitchen on site.</p> <p>The Sydney Swans Match Day and Event Management Team will be appointed to manage both the use of the central multi-purpose space on a typical basis, and the additional special events. This will ensure there is no operational conflict with the use of the space, and that the</p>



Agency Comments	Proponent Response						
	<p>events operate in a safe and efficient manner. In accordance with the management of events, it is expected that a greater intensity of events will occur during the out-of-season period, as this will be when the space is not in use by the Sydney Swans. The AFL period extends from March through to September each year. Notwithstanding this, events can also be held during the AFL season whilst players are offsite, for example at times during away games.</p> <p>During large-scale events, such as the Mardi Gras Festival, additional bump-in and bump-out support may be required. For these events, longer-term event planning and management strategies will be in place to ensure there is no conflict. While specific event strategies will be finalised as part of any hiring agreement, this may include an additional period of bump-in and bump-out to allow the appropriate transition of the space. The unique location of the site within an entertainment precinct also provides opportunities for integration with surrounding function spaces, such as the Hordern Pavilion and Plaza, to create a broader entertainment offer. Any use of the Hordern Pavilion will also require similar bump in/bump out processes.</p>						
<p><i>GFA</i></p> <p><i>Review the proposed GFA calculations and provide revised documents/plans as necessary, noting the GFA calculations provided within the RtS are not consistent with the revised architectural plans or the GFA summary (Appendix Aa).</i></p> <p><i>Provide a summary table which clearly cross references all proposed uses within the development to the appropriate land use definitions within the</i></p>	<p>The Preferred Project has a total GFA of <b>10,640sqm</b>. This GFA represents the final calculation of the site and is in accordance with the Architectural Plan set prepared by Populous and attached at <b>Attachment A</b>. A GFA breakdown calculation according to land use is provided in the below table.</p> <table border="1" data-bbox="1093 1091 2074 1283"> <thead> <tr> <th data-bbox="1093 1091 1865 1155">Proposed Use</th> <th data-bbox="1872 1091 2074 1155">GFA</th> </tr> </thead> <tbody> <tr> <td data-bbox="1093 1160 1865 1224">Business Premises</td> <td data-bbox="1872 1160 2074 1224">3,646sqm</td> </tr> <tr> <td data-bbox="1093 1228 1865 1278"><i>Office and administration spaces for the purposes of the Sydney Swans</i></td> <td data-bbox="1872 1228 2074 1278"></td> </tr> </tbody> </table>	Proposed Use	GFA	Business Premises	3,646sqm	<i>Office and administration spaces for the purposes of the Sydney Swans</i>	
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Agency Comments	Proponent Response	
<p><i>Standard Instrument (and SEPP 47 and ISEPP as appropriate) and provide corresponding GFA calculations.</i></p>	Business Premises  <i>Foundation tenancies including Go Foundation, Clontarf Foundation and Blood Bank</i>	178sqm
	Medical centre	415sqm
	Food and drink premises	154sqm
	Child minding care	96sqm
	Recreation facility (indoor)  <i>Inclusive of central multipurpose field, central netball court, wet areas, gymnasium</i>	4,569sqm
	Front of house and circulation	1,430sqm
	Loading and services	152sqm
	<b>Total</b>	<b>10,640sqm</b>
<p><i>Car and Bicycle Parking</i></p>	<p>The project incorporates a total number of nine car parking spaces, inclusive of one disabled parking space, on the eastern elevation of the site. These spaces are to be used for visitors to the site in a flexible, short-term manner.</p>	



Agency Comments	Proponent Response
<p><i>Review and clarify the proposed car parking provision, noting the revised landscaping plans show nine car parking spaces, while the RtS states that eight parking spaces will be provided.</i></p> <p><i>Review and provide updated plans/documents detailing the proposed bicycle parking, noting the proposed landscaping plans show 20 Bicycle racks (12 for staff and eight for visitors) the RtS and Transport Assessment Addendum state a total of 16 bicycle racks (32 parking spaces) are to be provided.</i></p>	<p>As illustrated in the Landscaping Plan, the project includes the following bicycle racks:</p> <ul style="list-style-type: none"> <li>• 12 bicycle hoops for staff use.</li> <li>• 8 bicycle hoops for public use.</li> <li>• <b>Total: 20 bicycle hoops, accommodating 40 bicycle spaces.</b></li> </ul> <p>The project therefore exceeds the Green Star requirement of 30 spaces, and thus is considered sufficient for the operation of the site.</p>
<p><i>Landscaping</i></p> <p><i>Please update the landscape masterplan (including hard landscaping detail) to reflect the revised landscaping layout.</i></p>	<p>Arcadia have prepared a precinct landscaping plan for the broader precinct, attached at <b>Attachment B</b>. The precinct landscaping plan demonstrates the integrated precinct across the RHI, Central Plaza, and Hordern Pavilion.</p>
<b>City of Sydney</b>	
<p><i>Permissibility</i></p> <p><i>The City raised significant concern in our objection letter regarding the justification provided to demonstrate permissibility of the development in accordance with State Environmental Planning Policy (State and Regional Development) 2011 (SARD SEPP) and State Environmental Planning Policy (Infrastructure) 2007 (ISEPP).</i></p>	<p>An application for a Site Compatibility Certificate was submitted with DPIE on 12 December 2019 and is currently under assessment with the Eastern District Team. Subject to the determination of the SCC, the project will satisfactorily address both tests to utilise the two-part test stipulated by the <i>State Environmental Planning Policy – State and Regional Development</i> and clarify the permissibility of the project.</p>



Agency Comments	Proponent Response
<p><i>Public Benefit and Contributions</i></p> <p><i>In light of the above (revised calculations), the proposal would result in a net population increase of 199.1 workers. The current CPI released in September 2019 amounts the development contributions payable for the proposal to be <b>\$544,844.48</b>.</i></p>	<p>The Sydney Swans agree to pay the Contributions Levy of \$544,844.48 to the City of Sydney in accordance with the City of Sydney Contributions Plan 2015.</p>
<p><b>Heritage</b></p> <p><i>The revised Heritage Impact Statement (HIS) as well the submission of the Conservation Management Plan (CMP) generally addresses the issues outlined in the City’s objection letter. The amended proposal aptly addresses the heritage significance of the building as required under State Environmental Planning Policy 47 – Moore Park Showground.</i></p> <p><i>It should be highlighted that careful consideration should be made to the location and selection of trees near the RHI building to ensure it has a low impact to fabric and does not visually obscure the building.</i></p>	<p>The project proposes an additional 23 trees to be planted on the Ground Level surrounding the RHI and Swifts building, and an additional 3 trees proposed on the Level 1 within planters. The trees have been located an appropriate distance away from the RHI to ensure there is no physical contact with the heritage fabric of the RHI.</p> <p>The proposed tree species Banksia Integrifolia trees, which at maturity will reach some 10m in height, as identified in the Revised Landscape and Public Domain Package (<b>Attachment C</b>) prepared by Arcadia, which updates the originally lodged information.</p> <p>This ensures the trees will develop to a height that will allow ongoing appreciation of the architectural and heritage significance of the RHI. This is further illustrated within the Tree Study Comparison prepared by Arcadia at <b>Attachment G</b>. Notwithstanding this, an appropriate condition could be imposed regarding confirmation of the selected tree species, if the consent authority deems it appropriate.</p>
<p><b>Environmental Sustainability</b></p> <p><i>The revised Ecologically Sustainable Design (ESD) Report submitted with the RTS generally addressed the concerns raised in the City’s objection letter.</i></p>	<p>As outlined in the ESD Memorandum at <b>Attachment D</b>, the project can appropriately utilise version 1.2 of the Green Star tool as this measurement is valid for projects seeking consent under Section J of NCC 2016.</p>





Agency Comments	Proponent Response
<p><i>The Report has identified that the development will achieve a 5 Star Green Star Design and As Built rating under version 1.2 of the tool. The City recommends that the development should apply the version 1.3, given it is the most recent version.</i></p>	
<p><i>With respect to the National Construction Code (NCC), the City suggests that the development comply with Section J of NCC 2019. This would align with the 5.5 Star NABERS rating requirement under Sydney DCP 2012. Energy and water points under the Green Star rating should be employed. The use of gas fired hot water systems is discouraged.</i></p>	<p>As identified in the RTS Report, the NCC 2019 contains provisions for a 12-month transition period until 30 April 2020 for the energy efficiency provisions contained within Section J. During this time, provisions of either NCC 2019 or NCC 2016 can be adopted.</p> <p>While NABERS benchmarks can be used as a guiding benchmark, subjecting the project to a 5.5 Star NABERS target, or equivalent, would not be a meaningful comparison given that NABERS only relates to offices, hotels, apartments, data centres and shopping centres.</p> <p>As such, the project will utilise the provisions of Section J 2016 and version 1.2 of the Green Star sustainability ratings, in accordance with current legislation.</p>
<p><i>The ESD Report should address façade shading to allow solar gain in winter and prevent direct solar gain in hot summer months.</i></p>	<p>As identified within the ESD Memorandum at <b>Attachment D</b></p> <p>Façade performance of the proposed NSW Swifts building is improved by:</p> <ul style="list-style-type: none"> <li>• The installation of a high performance, double glazed cassette panel system which has excellent thermal performance and is capable of blocking solar radiation. This is an outcome equivalent to external shading.</li> <li>• Significant amount of glazing is South facing and not subject to direct summer sun.</li> </ul>



Agency Comments	Proponent Response
	<ul style="list-style-type: none"> <li>Vertical Shading screens are provided to the Swifts office areas on the North East.</li> </ul>
<p><i>The City recommends that a separate meter is to be installed for the make-up lines for the cooling towers and swimming pool and spa.</i></p>	<p>A separate water meter will be installed for the swimming pools and spa. It is noted the project does not include cooling towers.</p>
<p><i>Further, whilst the ESD Report identifies that reuse of the existing structure will reduce waste, the development is to reuse or recycle at least 80% of construction and demolition waste, either on site or diverted for reuse and recycling.</i></p>	<p>The project seeks to efficiently manage and reduce demolition and construction waste where possible. It is intended that the project will meet Green Star credit 22 (Construction and Demolition Waste). The Green Star waste diversion target is 90% by weight or less than 10kg/m<sup>2</sup>. The contractor is aware of these requirements and is committed to meeting this target.</p> <p>For waste that cannot be suitably recycled such as excavation waste (including unwanted materials from excavation activities) and special waste (including asbestos waste and asbestos containing material as defined by the NSW EPA Guidelines and Policies for Waste), the material will be suitably disposed of.</p> <p>This recycling strategy is in accordance with Green Star guidelines, an industry accepted set of guidelines. A suitably worded condition could be imposed to reinforce this requirement if considered appropriate.</p>
<p><i>Car parking areas should also be designed and constructed so that electric vehicle charging points can be and are installed. These matters have not been clearly identified in the amended ESD report.</i></p>	<p>The project includes nine vehicle spaces along the eastern boundary of the site. The purpose of these spaces is for short-term, temporary visits for members of the public attending the community facilities on the site, such as the Blood Bank, GO Foundation and Clontarf Foundation.</p>



Agency Comments	Proponent Response
	<p>The proponent has reviewed the possibility of adding Electric vehicle charging spaces however the addition of these facilities does not align with the intention for car parks to be used short term. Typically, these types of spaces are installed in a commercial car park and it is currently not considered feasible to operate these facilities at the SSHQCC.</p> <p>The Green Star rating tool reflects the reality that there are a number of pathways to achieve best practice sustainability, the project is already expected to be rewarded for other sustainable transport characteristics of the site.</p> <p>Furthermore, it is noted electric charging points are located within the surrounding area. This includes within the Supa Centre shopping centre in Kensington, located 1.5km south-west of the site, and within the Westfield shopping centre in Bondi Junction, located 3.5km east of the site.</p>
<p><b>Transport and Access</b></p> <p><i>The issue raised in the City's objection letter regarding the Green Travel Plan (GTP) for the proposed development remains outstanding in the RTS. The proposal remains reliant on a significant number of 225 staff driving to work in a private vehicle and the capacity of a nearby multi-story car park to accommodate this traffic generation into the future. A genuine attempt to reduce modal car parking has not been demonstrated to encourage a behavioural shift in players, staff and visitors travelling to the site to use more sustainable transport modes. Therefore, the GTP is inadequate and does not</i></p>	<p>As outlined in the RTS Report, an Overview Green Travel Plan (GTP) was prepared by GTA and submitted within the SSDA package in support of the project. The Overview GTP provides guidance and an indication of the content to be provided within the Final GTP which is to be prepared prior to the issue of the Occupation Certificate. This plan will be prepared in collaboration with the Sydney Swans Limited, GTA, CTMPT and the Sydney Coordination Office within TfNSW.</p> <p>It should also be noted that TfNSW have recommended a condition of consent specifically referring to the preparation of a GTP which the proponent is prepared to accept.</p>



Agency Comments	Proponent Response
<p><i>satisfy the SEARs requirement for measures to promote sustainable travel choices for employees or visitors.</i></p> <p><i>The implementation of a location-specific travel plan and provision of end of journey facilities has not been provided.</i></p> <p><i>At a minimum, it is recommended that the quality and quantum of bicycle parking be increased and reflective of an attempt to make a modal shift as a minimum.</i></p>	<p>The project includes 40 bicycle parking spaces along the eastern elevation of the RHI building. This quantum of bicycle parking is consistent with the Green Star v1.2 requirement of 30 bicycle spaces, which has been adopted as the principal sustainability guideline for the project. There is no additional policy or guideline basis for the provision of additional bicycle parking beyond this provision. Further to this, it is noted there is already sufficient bicycle parking provided within the Entertainment Quarter precinct.</p> <p>The project provides designated staff end of trip facilities on level 1 of the RHI building with 5 private shower rooms, whilst staff will also have access to the non-binary change room facilities in the Academy which will provide an additional 5 private shower rooms. Staff will not have access to the player locker rooms.</p> <p>As outlined above, the finalisation of a location-specific travel plan will be contained within the Final Green Travel Plan, to be prepared prior to issue of the Occupation Certificate in accordance with the planning condition recommended by TfNSW.</p>
<p><b>Public Domain</b></p> <p><i>Further consideration should be made to improve the connections from the public car park on other side of Errol Flynn Boulevard as well as increase the definition of pedestrian links and footpaths to the site. Pedestrian paths of</i></p>	<p>As outlined in the RTS response, there is not an exclusive nexus between the proposed works and the upgrade of pedestrian facilities in the surrounding area. Whilst the project will generate an increase in patronage capacity in the surrounding area, there is already a suitable footpath network which is also broadly used by pedestrians accessing the</p>



Agency Comments	Proponent Response
<p><i>travel around and within the site should be prioritised in order to improve connectivity and safety.</i></p>	<p>Entertainment Quarter precinct, adjacent Centennial Parklands and transport services on Anzac Parade.</p> <p>For users accessing the site from the Entertainment Quarter car park to the east of the site, a signalised pedestrian crossing is located on the corner of Errol Flynn Boulevard and Lang Road, ensuring pedestrian safety. There is also a pedestrian crossing to the north of the RHI which links the Plaza directly to the Entertainment Quarter, which is a safe and convenient option for pedestrians to access the public car park.</p> <p>Notwithstanding this, the proponent is committed to ongoing consultation with the Trust and participation in precinct wide working groups that will help to deliver the requirements of the Moore Park 2040 Master Plan, which seeks to ensure the pedestrian networks surrounding the site are appropriate for the precinct use.</p> <p>With regard to pedestrian routes within the site, the project delivers significant improvements to the existing site condition to ensure pedestrian safety and public amenity. Pedestrian routes are defined through use of varying materials, landscaping and signage. This will be further developed during the detailed design stage.</p>
<p><i>Further, the entry driveway on Errol Flynn Boulevard should be realigned so that the layback and crossover are perpendicular to the footpath to reduce vehicular speed at this point. The angle of the driveway indicated on the plans favours vehicular movement and not pedestrian safety. Vehicles should be</i></p>	<p>The entry driveway layout on Errol Flynn Boulevard will be largely maintained as per existing. The alignment remains mostly perpendicular to Errol Flynn Boulevard with the minor angle to better facilitate all vehicles and allow them to manoeuvre through the internal roadway and access on-site parking and the loading area. This is illustrated within the swept path diagrams provided within the letter from GTA Transport Consultants at <b>Attachment E</b>. These</p>



Agency Comments	Proponent Response
<p><i>encouraged to slow down when using a vehicle footway crossing in any setting, and this is more pertinent in busy public areas.</i></p>	<p>demonstrate that a fully perpendicular access would not be workable at the site, due to the manoeuvring requirements of a medium rigid service vehicle.</p> <p>Furthermore, the proposal includes a 1.5-metre-wide footpath on the southern side of the entry driveway to allow pedestrians direct access to the site from Errol Flynn Boulevard, which represents an improvement over current conditions.</p>
<p><b>Landscape and Tree Management</b></p> <p><i>The submitted Arborist Addendum and the previously submitted Arboricultural Impact Assessment &amp; Tree Protection Specification prepared by Allied Tree Consultancy have been reviewed. Additional discrepancies as well as inconsistencies with the references of the updated documents have been identified.</i></p>	<p>The points raised in Section 7 of the letter which City of Sydney have identified [Section 7 (a) – (e)] are addressed in turn within the Arborist Response which is attached at <b>Attachment F</b>.</p>
<p><b>Tree Removal</b></p> <p><i>The City reiterates that Trees 58, 59 and 60 on Errol Flynn Boulevard must be retained. The trees are semi mature to mature healthy trees with a medium landscape significance rating. The trees form part of a group of planting along Errol Flynn Boulevard that make a positive contribution to the landscape.</i></p>	<p>As identified within the RTS, these trees are required to be removed to facilitate a vehicular exit point. If this was removed, this would require vehicles to exit via the public plaza, or alternatively exit via the entrance, which would have unacceptable safety impacts.</p> <p>The proponent originally investigated alternative options for the vehicular crossover, including relocating of the crossover further north. However, this was determined to generate a greater level of impact on tree retention.</p> <p>The proponent therefore sought to progress with the design option that has the least impact on trees and safety.</p>



Agency Comments	Proponent Response
<p><i>Further, the proposed north-eastern driveway cross over for the car park exit will have a significant encroachment within the TPZ of Trees 56 and 61. As an alternative, it is suggested that the proposed north-eastern driveway crossover be amended to utilise existing crossovers or be relocated so that a section of trees with lesser value, size and health be removed instead. As such, consideration should be made to Trees 42-46, which are of less significance and remove Tree 43 and 45.</i></p>	<p>This proposed alternative arrangement has been explored by the project team.</p> <p>Firstly, it is the case that both groups of trees are considered from an arboricultural perspective to have an equivalent significance, meaning that no difference exists regarding the loss of either trees No. 43-46 or 58-60 (see the Arborist Response at <b>Attachment F</b>). Therefore, the design should be influenced by the practical location for the cross-over.</p> <p>Secondly, as advised by GTA within <b>Attachment E</b>, it is considered that an exit driveway in the location of trees 42 to 46 would introduce conflict with the existing multi-deck car park access on the opposite side of Errol Flynn Boulevard. In this scenario, vehicles would theoretically be able to exit the RHI site and turn right onto Errol Flynn Boulevard using the break in the central median at the multi-deck car park access, which would create conflict with traffic egressing the multi-deck car park. Whereas, the proposed exit driveway in the location of trees 56 to 61 (where currently proposed) avoids this conflict.</p>
<p><i>It should be noted that the photos of excavation (test pits) within the TPZ of Trees 56-61 have not been provided. Observation 4 of the Arborist Addendum states that the photos are available on request. These photos must be submitted to assess the impacts of excavation</i></p>	<p>Photos of the on-site excavation (test pits) prepared by Allied Tree Consultancy have been provided at <b>Attachment F</b>.</p>
<p><i>Additionally, it is recommended that only minor pruning of less than 10% of street Trees 8 and 9 be undertaken. It is reiterated that all trees surrounding</i></p>	<p>Construction of the project will require pruning of two trees located on Lang Road adjacent to the southern boundary, as the proposed NSB will conflict with a portion of dripline. The extent of the pruning (20% of tree 8 and 13% of tree 9) is not considered a detriment to the trees.</p>



Agency Comments	Proponent Response
<p><i>the site on Council owned land be retained as well as all other trees impacted by the development, including the six trees in the plaza, be protected.</i></p>	<p>The tree species, a Jacaranda tree and a Sweet Gum tree, are widely planted resilient species that are tolerant to pruning and coppicing. This is reinforced in the literature review within the Arborist Addendum submitted in the RTS package.</p> <p>The pruning of the trees will not impact the structural dynamics or amenity value of the trees when viewed from the surrounding streetscape. Most notably, the extent of pruning is in accordance with Australian Standard 4373-2007 and the International Society of Arboriculture pruning standard of 25%, and as such the pruning will not significantly impact the health of the trees. Furthermore, there is no policy standard that requires a 10% maximum pruning level.</p> <p>The trees will therefore be retained during the construction and operation of the project. To ensure appropriate approvals are in place, an application for tree pruning will be submitted to City of Sydney Council to seek consent for pruning of Tree 8 and Tree 9. This process can be dealt with by through a condition of development consent if required.</p>
<p><b>Tree Planting</b></p> <p><i>The Landscape Plan, prepared by Arcadia, has suggested planting of 26 trees of mixed species. The majority of the selected tree species will be under 10 metres in height at maturity. The proposed tree species of Zelkova serrata 'Musashino' should be amended to native tree species that is in keeping with the surrounding vegetation.</i></p>	<p>Although they do not form part of this proposal, it is understood that the trees within the plaza are to the north of the site are proposed to be retained.</p> <p>The proposed tree species have been amended from Zelkova trees to Banksia Integrifolia species. This is detailed further in the Revised Precinct Landscaping Plan (<b>Attachment C</b>).</p>





Agency Comments	Proponent Response
<p><i>Further, the proposed tree species selection should be amended to include a greater number of trees that will grow greater than 15 metres in height and meet the City's canopy coverage requirement of 15%. The southern landscaped area (grass) between the existing palm trees and the new netball court has the potential for medium sized tree planting.</i></p>	<p>The tree species proposed for the project have been selected with consideration of the heritage significance of the existing RHI external fabric, and the maintenance of visual sightlines towards the building.</p> <p>Based on these site-specific factors, it is not considered appropriate to incorporate tree species that will grow greater than 15m in height as this will disrupt the significance of the RHI, which has been maintained as a key design principle throughout the entirety of the project. The incorporation of additional planting in the southern landscaped area would block existing view corridors towards the RHI from the south-east. This would undermine the efforts of the project team to celebrate this viewpoint and remove the traditional 'back of house' element from this southern corner.</p> <p>Notwithstanding the above, should the City of Sydney require additional planting coverage on the site, selection of an appropriate tree species for the site can be determined through a condition of development consent.</p>
<p><i>The Landscape Specification states that on-slab areas will be cover the bottom of the planter with a geotextile turned up to 300mm and taped to the side of the planter. This is likely to result in turning and circling of the roots, which is likely to impact the trees future growth and structural condition.</i></p>	<p>The landscape specification has been amended such that it does not include any on-slab planting.</p>
<p><i>Ten ground level car parking spaces are proposed along the frontage of the RHI. It is appropriate to apply the principles of Section 3.5.2(7) of Sydney DCP 2012 with respect to tree planting within ground level parking areas.</i></p>	<p>It is noted that this is a new issue raised by Council and relates to a specific DCP Policy. As identified in <i>State Environmental Planning Policy (State and Regional Development) 2011</i>, Clause 11 states that DCP policies do not apply to State Significant Development.</p>



Agency Comments	Proponent Response
	<p>However, it is clear that the proposal meets the basic objective of the policy to deliver additional tree planting relative to the number of parking spaces delivered at development sites. The project proposes an additional 23 trees to be planted on the ground level surrounding the RHI and Swifts building, with six Water Gum trees proposed directly adjacent to the nine parking spaces, which therefore exceeds the number of new trees required under the DCP policy.</p>
<p><i>Newly planted trees must meet Australian Standard 2303: Tree Stock for Landscape Use (2015). Young trees should be self-supporting without ties attached to their trunk and stakes are to be used as protection not as supports. Pruning of young trees should be done by an AQF Level 5 Arborist only.</i></p>	<p>This matter can be the matter of an appropriately worded condition and it is confirmed that any pruning will be undertaken by a suitably qualified Arborist.</p>
<p><b>Environment, Energy and Science Group (EES)</b></p>	
<p><i>The BDAR includes an action that site landscaping is to use appropriate local native species, however the Masterplan which accompanies the RTS shows deciduous trees are also proposed to be planted. If the SSD is approved, it is recommended that conditions are included in the approval to ensure that local native provenance species are used from the native vegetation community that once occurred in this locality.</i></p>	<p>As indicated above and within <b>Attachment C</b>, the proposed landscaping has been updated to incorporate native tree species, such as the <i>Banksia Integrifolia</i>.</p> <p>The proponent is content to accept the conditions proposed by EES.</p>



Agency Comments	Proponent Response
EES comments on the Microbat Surveys	This matter will be addressed under sperate cover following further discussions with the project ecologist and EES.
<b>RMS, TfNSW and Heritage NSW</b>	
Each of these authorities suggested planning conditions be attached to the consent if the SSDA is approved.	The proponent is content to accept the conditions as proposed by these parties.