

Cameron Sargent
Team Leader, Key Site Assessments
Department of Planning, Industry & Environment
4 Parramatta Square
12 Darcy Street
Parramatta NSW 2120

22/04/2020

Dear Mr Sargent

Re: Sydney Fish Market Concept and Stage 1 (SSD-8924) and Stage 2 (SSD-8925) Response to Submission (RtS) comments

I am writing in response to your letter dated 8 April 2020 requesting additional information in relation to comments that have been raised by Council and government agencies further to our Response to Submissions issued on 28 February 2020.

Our responses to the main issues raised are as follows:

1. City of Sydney Comments

Appendix A includes all items raised by City of Sydney and our response. Responses to the key items outlined in DPIE's letter are detailed below:

Urban Ecology and Biodiversity

As per the RtS report, INSW will prepare an Aquatic Biodiversity Management Plan during the detailed design phase as a condition of consent. The plan will be shared with DPIE and City of Sydney for comment.

Bridge Road Frontage

The footpath between the building and Bridge Road boundary at ground level is to be retained in the ownership of the NSW Government and managed by government as described in Section 3.19 of Environmental Impact Statement

Noted in the 'New Sydney Fish Market at Blackwattle Bay - Stage 2 Development Application Main Works' and in the RtS Bridge Road is a classified road and is managed by TfNSW in accordance with the Roads Act 1993. Therefore, Bridge Road and the adjoining public domain will be managed by the relevant public authorities. The further response from TfNSW dated 19 March 2020 proposes conditions of consent relating to works to Bridge Road, for the management of the pick-up and drop-off area and requiring the new off-road cycling connection on Bridge Road

to be designed in accordance with Australian Standards. In this context, there is no need for any additional easement rights in favour of Council.

Bicycle Connections and Movement Conflicts

The RtS provides justification of the proposed shared cycleway including consideration of options such as a dedicated off-road and separate cycleway in response to submissions from City of Sydney and TfNSW. The TfNSW response to the RtS acknowledges this justification and recommends: *It is requested that the applicant ensures that the new off-road cycling connection on Bridge Road is designed in accordance with Australian Standards.*

INSW does not agree with the suggested condition by City of Sydney. Discussions will continue with TfNSW and City of Sydney on this issue and the following alternative condition is proposed:

Prior to the commencement of construction, the Applicant will continue to consult with TfNSW and City of Sydney on the design of shared path cycleway and facility for the Bridge Road footpath. This will consider the available roadside / footpath space on Bridge Road, safety of all street users as well as interface with the adjacent drop off / pick up zone.

Tree Management

TreelQ has confirmed that the Aboricultural Impact Assessment that was submitted as Appendix 9 of the Main Works RtS has fully addressed the concerns raised by the City of Sydney. In addition, TreelQ has reviewed the Traffic Signals Plans for Wattle Street and Wentworth Park Road intersections and have confirmed that minor additional pruning will be required. Please see Appendix B for the letter from TreelQ for further details.

2. EPA Comments

Site Auditor Review

INSW engaged a site auditor from Ramboll, who is EPA Accredited, who will review the characterisation of fill materials and the Hazardous Materials Management Plan. We recommend for this to be a condition of consent that will be completed prior to Early Works commencement.

INSW do not have any amendments on the other recommended conditions proposed by EPA.

3. TfNSW Comments

INSW will continue to liaise with TfNSW regarding the review of the SIDRA model.

In relation to the first recommended condition under the Road Works section, we suggest the following changes:

Prior to commencing any works within the classified road reserve area the proponent must obtain any required approvals under Section 87 and 138 of the Roads Act 1993 from TfNSW.

INSW do not have any amendments on the other recommended conditions proposed by TfNSW.

If you have any questions please contact Jennifer Chang, Development Manager on
Jennifer.chang@infrastructure.nsw.gov.au

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Tom Gellibrand'.

Tom Gellibrand
Head of Projects NSW

Appendix A – Response to City of Sydney Recommended Conditions

Item	Subject	Comment/Recommendation	Response
1.1.1	Roof	The RtS provides a detailed drawing illustrating the operability of the standard roof cassette which is considered acceptable. It is recommended that further information is provided to demonstrate how the panels will be operated (i.e. in large banks).	If deemed required INSW can present this information to the Design Integrity Panel for review.
1.1.2	Materials and finishes	<p>It is noted that details and finishes including the patterned ceramic cladding are still being finalised. It is recommended that materials and finishes information be submitted for final review in consultation with the Council's Director City Planning Development and Transport once detail has been developed and prior to the commencement of works. Similarly, it is recommended a final materials and samples board be submitted and approved prior to works commencing. Further, the following comments are made:</p> <p>a) Reflective materials used on the exterior of buildings can result in undesirable glare for pedestrians and on occupants of other building and potentially hazardous glare for motorists. Given the high key finishes and visibility of the proposal for motorists, surrounding properties and the Bay and pedestrians, facade treatments should minimise the reflection of sunlight from the building to surrounding areas, buildings and the foreshore. It is important to ensure that building materials do not lead to hazardous, undesirable or uncomfortable glare to pedestrians, motorists or occupants of surrounding buildings.</p> <p>b) Treatment of carpark entries, access ramps and any loading, service or waste management areas located at street level are to be integrated with the building envelope. All surfaces to these areas are to be treated in material quality equal to the standard</p>	<p>Final materials selections will be made in line with the Design Integrity Strategy agreed with the Design Review Panel (DRP).</p> <p>a) Final materials selections and orientations will be reviewed to ensure effects of glare on pedestrians, motorists and occupants of surrounding buildings are minimised.</p> <p>b) Final public domain interface design details will be developed in line with the Design Integrity Strategy.</p> <p>c) The building will not include PE cladding and final materials selections will be reviewed by the fire engineer and PCA to ensure compliance with best practice fire safety.</p> <p>d) These requirements are in line with good practice and align with INSW's approach to design and procurement but are not relevant to the consideration of the SSDA.</p>

		<p>of the principle building facade to achieve a high-quality interface with the public domain.</p> <p>c) The proposal must not include PE (Polyethylene) or other flammable cladding.</p> <p>d) Building materials should be carefully chosen and should consider warranties, durability, construction application requirements/methodology and examples of prior successful use in the sites of similar proximity to seawater. Maintenance, access, servicing and replacement of all selected materials should also be considered and fully documented in an operations and maintenance plan.</p>	
1.2	Scenic quality and visual impacts	It is recommended that all landscaping plans be amended prior to determination to include the design recommendations in the Visual Impact Assessment.	Aspect are currently working on the detailed design for the tender documentation and will consider the Visual Impact Assessment recommendations.
1.3	Raise Promenade	It is recommended that genuine opportunities for multiple public rest, beyond sitting at a cafe/restaurant, be provided to the public all along the northern side of the upper promenade.	INSW maintain that this condition is not required as sufficient provision exists. The northern, eastern and western stepped promenades will all provide a variety of seating settings.
1.4	Central Internal Promenade/ Main Boulevard	It is noted that no amendments have been made to address comments recommending increased vertical permeability between floors, and that elements overhanging the central promenade be further minimised. Opportunities to increase vertical permeability between the floors have been limited to the auction hall void and at the south travelator.	<p>There aren't other opportunities to increase the vertical permeability throughout the building.</p> <p>There are two issues to address here:</p> <p>1) Visual permeability into the operational (Lower Ground) level. As well as the provision of visual permeability internally in the building at the traveller and auction void, the operational activities will be visible through the Bridge Road façade and over the operational wharves from the northern promenade stairs and the northern edge of the Upper Ground level.</p> <p>2) Elements overhanging the central promenade. The main element that bridges the central promenade is the Mezzanine enclosed space housing the Sydney Seafood School. The Seafood School location allows pedestrians on the central promenade to view the activities happening in the Seafood School.</p>

1.5	Solar Access	The construction of a large 25m tall building on the northern side of Bridge Road will effectively place the road in extensive periods of shadow throughout the year. Combined with the existing trees, a very closed-in and darker road environment will be a result with likely impacts on the success of any verge or new street tree planting. The various viewpoint representations do not accurately reflect this impact and should be updated to reflect shadowing effects. Planting and tree selection must be made with this in mind.	Noted. Aspect will provide planting and tree selection during the detailed design phase
1.6	Wind Impacts	The City recommends that the outdoor design be developed to incorporate measures to address issues identified by Windtech. It is also recommended that the developed design be reviewed to ensure that the design intent of the proposal is not diminished by the incorporation of these elements.	The design team are working with Windtech to address all high-risk issues raised in their report but will be unable to address all issues identified in the report as the design will be affected if all are incorporated. Alternative solutions will be developed where necessary to ensure acceptable conditions.
2.1	Privatisation and subdivision of Blackwattle Bay	Combined these reports reinforce concerns below about the use of public authority land for the vehicle drop off along Bridge Road and forcing pedestrian and cycle users onto what could be regarded as future 'privatized' land to pass by the site. This is can only be ensured by providing an easement or other agreement that requires approval from the City of Sydney before modifications can be undertaken to this area.	The footpath between the building and Bridge Road boundary at ground level is to be retained in the ownership of the NSW Government and managed by government as described in Section 3.19 of Environmental Impact Statement. As noted in the New Sydney Fish Market at Blackwattle Bay - Stage 2 Development Application Main Works and in the Response to Submissions Bridge Road is a classified road and is managed by TfNSW in accordance with the Roads Act 1993. Therefore, Bridge Road and the adjoining public domain will be managed by the relevant public authorities. The further response from TfNSW dated 19 March 2020 proposes conditions of consent relating to works to Bridge Road, for the management of the pick-up and drop-off area requiring the new off-road cycling connection on Bridge Road to be designed in accordance with Australian Standards. In this context, there is no need for any additional easement rights in favour of Council.

2.2	Stormwater and Flood Assessment	In previous correspondence, the City expressed that a meeting to discuss stormwater and flood management within and around the site was desirable before the application was determined. To date this has not occurred. It is requested that this meeting still occurs prior to determination.	INSW arranged a meeting for 27 February 2020 with the City of Sydney, Cardno (Flooding and Water Quality consultant) and Mott MacDonald (Engineers). The City of Sydney representative did not attend. The presentation was sent to the representative and they did not request another meeting or further information.
		The City has adopted MUSIC Link (i.e. automatically sets the City's water quality parameters in the MUSIC program) and is recommended that the development comply with such model. The certificate/report from the MUSIC Link model and the electronic copy of MUSIC Model is recommended to be submitted to the City for review and approval prior to the commencement of any work.	Cardno have used MUSIC to model water quality, in their SSDA Flooding & Water Quality Assessment Report, the Executive Summary states that: "A MUSIC water quality model was assembled to assess the existing hydrology and water quality conditions and the impact of the proposed works" and that "[t]he results of the MUSIC modelling indicate that the proposed WSUD strategy will achieve the required CoS water quality targets." INSW agree to provide the model to the City for review prior to commencement of work.
2.3	Width of footpath	The City maintains concerns regarding the use of public land for the vehicle drop off along Bridge Road and requiring pedestrian and cycle users onto private land to pass the site. This is not supported, though can be addressed by providing an easement or other agreement that requires approval from the City of Sydney before modifications can be undertaken to this area.	The footpath between the building and Bridge Road boundary at ground level is to be retained in the ownership of the NSW Government and managed by government as described in Section 3.19 of Environmental Impact Statement. As noted in the New Sydney Fish Market at Blackwattle Bay - Stage 2 Development Application Main Works and in the Response to Submissions Bridge Road is a classified road and is managed by TfNSW in accordance with the Roads Act 1993. Therefore, Bridge Road and the adjoining public domain will be managed by the relevant public authorities. The further response from TfNSW dated 19 March 2020 proposes conditions of consent relating to works to Bridge Road, for the management of the pick-up and drop-off area requiring the new off-road cycling connection on Bridge Road to be designed in accordance with Australian Standards. In this context, there is no need for any additional easement rights in favour of Council.


2.4	Green promenade and public domain interface	The City seeks clarification of the control and or ownership of the footway between the drop-off zone and the edge of building as the plans of subdivision show no change in the southern boundary along Bridge Road. Currently, the shared zone will be on future privatized land with the drop-off and planters on public land. It is essential that any pedestrian or cycle accessway occurs on public land so that control of access to pedestrians and cyclists is maintained by the relevant roads authority.	The footpath between the building and Bridge Road boundary at ground level is to be retained in the ownership of the NSW Government and managed by government as described in Section 3.19 of Environmental Impact Statement
		The width of the shared zone for cyclists and pedestrians is impacted variously by seats on the sides of planters, stairs to upper levels of the building and other public domain items. The available unencumbered widths for pedestrians and cyclists are much less than the dimensioned sections. Changes are required along this frontage to increase the width and reduce conflict between people crossing from the drop-off area and are discussed in more detail in the Transport and Access section below.	Noted. To be considered in detailed design.
		Options to activate the louvred façade with a potential public art or signage installation are being considered. Options to integrate public art are recommended, but signage will not be supported in this location.	Noted
3.1	Onsite Car Parking Numbers	The City previously recommended an additional 4 accessible car parking spaces be provided on site, however, based on the explanation provided in the RtS, this requirement is no longer required.	Noted.
3.2	Access / traffic generation / SIDRA modelling	The submitted preliminary loading dock management plan has provided swept paths and includes some safety measures and procedures during heavy vehicle operations. Additional measure controlling the flow in the confluence (see figure below), however, have not been provided and should be addressed particularly where will the incoming/outgoing vehicle stopping line be to give way to the heavy vehicle maneuvering. Any future approval must require this issue to be addressed in a consent condition.	Noted

		<p>The RtS has submitted a network modelling and reported similar results for the adjacent intersections. It is noted that Transport for NSW and RMS are intensively involved with this. There are some unsolved issues like traffic cycles (180 sec vs 120 sec), which is beyond City's scope and will be taken care by TfNSW. Given this, a SIDRA network model has been developed and analysed and no further micro-simulations are required.</p>	<p>Noted. This is being resolved with TfNSW.</p>
3.3	Bicycle parking, connections and design of Bridge Road	<p>It is recommended that any future consent condition require a revised design of Bridge Road that incorporates the following to be approved prior to the commencement of works:</p> <ul style="list-style-type: none"> a) Separated cycling facility which provides separation of bicycle movements from people walking and vehicles driving or parking on Bridge Road; b) Appropriate level of coach and point to point drop off and pick up spaces; and c) Space for people alighting from vehicles at the kerb side to wait adjacent to their vehicles. <p>The design must be undertaken in consultation with the City of Sydney, DPIE and TfNSW</p>	<p>The RtS provides justification of the proposed shared cycleway including consideration of options such as a dedicated off-road and separate cycleway in response to submissions from City of Sydney and TfNSW. The TfNSW response to the RtS acknowledges this justification and recommends: It is requested that the applicant ensures that the new off-road cycling connection on Bridge Road is designed in accordance with Australian Standards.</p> <p>INNSW does not agree with the suggested condition by City of Sydney. Discussions will continue with TfNSW and City of Sydney in this issue and an alternative condition is proposed:</p> <p>Prior to the commencement of construction, the Applicant will consult with TfNSW and City of Sydney on the design of shared path cycleway and facility for the Bridge Road footpath. This will consider the available roadside / footpath space on Bridge Road, safety of all street users as well as interface with the adjacent drop off / pick up zone.</p>
3.4	Walking	<p>The RtS states that the new pedestrian crossing at the Bridge Road / Wentworth Park Road intersection will improve access to the Glebe light rail stop. Commitment to improving pedestrian connectivity between the existing Fish Market light rail stop and the site is also recommended.</p>	<p>INNSW do not agree for this to be a condition of consent. The improved connectivity to the existing Fish Market light rail stop will be considered in the Blackwattle Bay Masterplan.</p>
4.1	Waste and resource recovery	<p>A Green Star 6 Star ambition provides opportunity to take a more leading and progressive approach to resource conservation, resource recovery and best practice waste management. Given the NSW government's and now federal government's restated positions on controlling and recovering</p>	<p>The building is being designed to facilitate best practices in waste management. However, the operational waste management strategy will be developed and implemented by the tenant, Sydney Fish Market Pty Ltd.</p>

		waste more effectively, the City recommends a review of the proposed operational waste management strategies to ensure Australian Best Practice and demonstrable leadership is achieved.	
4.2	Mains potable water savings, grey water treatment, water quality	Given the relative volumes of water end-uses repeated capture, cleansing and recycling of wash-down water is an essential water saving initiative for such a significant and exclusive end-of-bay project. The application does not address this, and a response is recommended.	The project currently includes capture and recycling of trade waste water. However, INSW requires flexibility in how it achieves its sustainability goals to ensure the best value for money outcome is achieved in the procurement of the building.
		a review of the plans shows stormwater capture points and basins at the roof level, however there is no indication of how rainwater will be stored in retention tanks, treated and distributed to the end-uses, such as cooling towers and toilet flushing. This infrastructure planning needs to be incorporated at the very beginning of a building's design and cannot be designed in post-determination. Additionally, rainwater tanks are not identified or easily labelled on the Stormwater Management Plan prepared by Mott McDonald.	Section 3.12 of the EIS details the principles that will be adopted in the final stormwater infrastructure design.
		The RtS notes the proposed water-sensitive urban design devices do not treat the major stormwater overland flows from the broader upstream Blackwattle Bay catchment in volume. This is an issue given the site is at the low point and if not resolved will result in pollutants entering the waterway. The design is still considered to be uncoordinated between engineers and landscape architects.	This comment is only relevant to significant rain events that overwhelm the proposed water-sensitive urban design devices. As noted in the RtS, to provide treatment for the entire upstream catchment is not practical within the space available. Also, it is the smaller, more regular events with flows contained in the pit/pipe network that should be targeted for treatment, rather than the major overland flows.
		It is also recommended that stronger commitments be made regarding greywater treatments. The submitted ESD report states "Greywater subjected to post treatment process. This initiative still to be confirmed pending feasibility". It is recommended that the proponent commit upfront to this initiative.	As per the above comment, INSW requires flexibility in how it achieves its sustainability goals to ensure the best value for money outcome is achieved in the procurement of the building.
4.3	Response to ESD Policy	The City believes that the proposal still does not respond strongly enough to the NSW government's Net Zero Emissions by 2050 target, yet it has the potential to achieve this. In the face of increasing climate change impacts and continued greenhouse	The design of the proposal does include significant measures to deliver energy efficiency, renewable energy and climate change mitigation. INSW has committed to achieving a 5 Star Green Star rating for

		gas emissions increases, the City released its Climate Emergency Response in February 2020. While emissions have fallen steadily within the City of Sydney since we established our baseline and targets, large scale development jeopardizes trajectory to our 2040 Net Zero emissions target if not contributing appropriately. It is imperative that every large-scale development maximise its energy efficiency, renewable energy and climate change mitigation opportunities.	the building, which it believes would be a good outcome for a combined industrial / retail premises of this nature. Further, INSW is targeting a 6 Star Green Star rating for the building.
		It is also noted that the RtS and EIS refer to Council's superseded guidance document City of Sydney Policy for Waste Minimisation in New Developments, 2005 for waste management. This was replaced in 2017 by the City's Guidelines for Waste Management in New Developments. Future waste management plans and documents are recommended to use the current guidelines.	Noted. Future waste management plans will consider the City's Guidelines for Waste Management in New Developments (2017)
4.4	High Environmental Performance	The City recommends a 6 Star Green Star rating to be adopted for the development and not just an ambition, with a strong focus on maximising credits in the Energy category as the Climate Emergency is the highest priority environmental concern in the Sydney and NSW context.	INSW do not agree with this recommended condition. As noted in the EIS the project is committed to achieving a formal Green Star Rated outcome under Green Star - Design & As Built – v1.2 and INSW is targeting 6 Star but cannot commit to that rating until market engagement is undertaken.
		Given that refrigeration will likely dominate the energy end use profile and that commercial refrigeration equipment generally has a long life, it is critical that the most efficient refrigeration (plus pumping, lighting and any general space conditioning) equipment is installed from the commencement of the use without compromise in order to contribute to much improved per square metre energy use within the new site when compared to existing conditions (at least 30% better than existing site, as the existing site is in effect the reference building for Green Star purposes).	The commercial refrigeration systems are being designed in line with industry best practice. An overall 40% reduction in energy use is being targeted as part of the 5 Star Green Star rating strategy. However, INSW requires flexibility in how it achieves its sustainability goals to ensure the best value for money outcome is achieved in the procurement of the building.
		The NSW government's recently released Net Zero Plan Stage 1 2020-2030 specifically states that NSW government will build on its ambitions and commitments "by purchasing our electricity from low emissions sources of generation". A categorical commitment from the proponent is thus needed now regarding long term power purchase commitments for this development.	The building tenant, Sydney Fish Market Pty Ltd, will be responsible for procuring the electricity supplier for the building not the NSW government. The Agreement for Lease with the building tenant has already been executed and the NSW government is therefore not

			able to provide a categorical commitment regarding power purchasing during the lease term.
5	Security	The RtS notes that the undercroft area beneath the western stepped promenade is now enclosed. It is recommended that updated drawings and a Security Risk Assessment be provided reflecting any changes made to the undercroft beneath the western stepped promenade. This is to be reviewed by the Design Review Panel as part of the design excellence strategy for the project.	The Security Risk Assessment and updated drawings are being updated as part of the detailed design phase and will be provided to the DRP.
6	Social Impact and Accessibility	The City welcomes input from an ergonomic consultant in the design of the promenade stairs to ensure adequate usability for the public.	3XN has engaged an ergonomic consultant, Dohrmann Consulting, as part of its design team and the design of the promenade stairs has been developed in consultation with Dohrmann Consulting to optimise usability.
		It is noted that the northern and southern stair flights do not appear to provide stair landings of a suitable width. It is recommended that the northern and southern stair flights be broken up into smaller flights, and that the recommendations of the Accessibility Compliance report prepared by Group DLA be addressed in the design development stage of the design.	INSW do not agree with this recommended condition. Group DLA has worked closely with the design team to ensure that the stairs are compliant and provide suitable landings.
7	Tree Management	The RtS has not adequately responded to the City's submission comments in relation to the potential impacts on the trees within Wentworth Park from the installation of new traffic signals at the intersection of Bridge Road and Wentworth Park Road. The concerns raised by the City about several trees within the park likely to require substantial pruning for sightlines has not been addressed.	<p>TreeIQ has reviewed the Traffic Signal Plans for the Wattle Street and Wentworth Park Road intersections and has confirmed that additional pruning will be required:</p> <ul style="list-style-type: none"> • Tree 14WP – Reduction Pruning of higher order branches (<25mm) at approximately 5m. Total pruning works for tree will account for approximately 2% of total crown volume. • Tree 15WP – Selective Pruning 1x 150mm branch at approximately 4m. Total pruning works for tree will account for approximately 10% of total crown volume. Refer to Figure below.

	<p>the submitted Arborist Report does not include an assessment of the likely impact on the trees as a result of these traffic light changes. As such, it is recommended that an updated Arborist report is provided which assesses the likely impacts of the traffic light installation and provides recommendation on mitigation measures that minimises impacts, including options for tree retention and a pruning specification.</p>	
	<p>The Arborist Report does not adequately address the potential impact of what occurs if tree roots are found in areas of road and footway that are to be raised past the wall on Bridge Road. Any negative impact upon the trees, particularly structural roots, could be detrimental to the longevity of these trees. No root mapping is provided while the application proposes pruning of the fig trees and the removal of part of the brick wall. The City does not support these works without appropriate mapping and careful consideration of potential impacts on the significant trees.</p>	<p>No root mapping was undertaken as the road and footpath are to be raised. Roots under the existing footpath are to be retained and protected. The Arboricultural Impact Assessment & Tree Protection Specification also provides a detailed methodology for undertaking demolition works, pit decommissioning, construction of footpath and kerbs, installation of underground services, and alteration to the park wall and stairs (if required) within the Tree Protection Zone areas.</p>
	<p>The report further notes the need to lift the crown of existing trees on the southern side of Bridge Road. Reviewing the suggested measures reveals this will have a large effect in reducing the crown area of the trees. It is requested that a comprehensive assessment (point survey) of the potential pruning of the trees in Wentworth Park for vehicle clearance be undertaken as a result of the raising of Bridge Road</p>	<p>In relation to the comments regarding the pruning works for vehicular clearances, Appendix 4 of the Arboricultural Impact Assessment & Tree Protection Specification provides a detailed Pruning Specification (identifying individual branches to be pruned). In general, the pruning works will account for approximately 2-4% and a maximum of 10% of the total crown volume.</p>
	<p>It is also noted that the submitted landscape charter and photo montages suggest a range of trees species will be planted along the frontage of the new Fish Market along Bridge Road. This is not consistent with the City's Street Tree Master Plan (STMP) which nominates Brush Box as the species required to be planted along the entirety of Bridge Road. The detailed design</p>	<p>The photomontages are indicative and does not reflect what planting that has been designed by the landscape architects. The landscape design and tree species selection along Bridge Road has been designed in accordance with the City of Sydney <i>Street Tree Master Plan 2011 for Part C</i></p>

		must reflect the STMP. The Submitted EIS and RtS further provide cross-sections through the two park areas at either end of the site. The soil depths for trees are unlikely to be correctly represented here, but attention is drawn to the need to ensure adequate depths are planned for and provided.	– <i>Precinct Plans (Glebe East)</i> . This includes <i>Lophostemon confertus</i> (Brush Box) along to Bridge Road.
8	Urban Ecology and Biodiversity	Overall, the City is not satisfied with the response provided in the RtS regarding improvement aquatic and terrestrial biodiversity within and surrounding the development site. Although there is mention in the submitted documentation of improving biodiversity, it appears to be minimal and not based on evidence. There could be significantly more done to improve local biodiversity.	As per the RtS report, INSW will prepare an Aquatic Biodiversity Management Plan during the detailed design phase as a condition of consent. The plan will be shared with DPIE and City of Sydney for comment.
		a review of the Biodiversity Values Map prepared by the Department of Planning, Industry and Environment under Part 7 of the Biodiversity Conservation Act 2016 indicates part of the north-eastern corner of the site has been identified to have a small area identifying values. Development within an area identified on the Biodiversity Values Map, as provided below, requires assessment using the Biodiversity Assessment Method, which the consultant has carried out, but there is no comment made at all of the biodiversity values identified in the current version of the Map (published on 27 November 2019). The report submitted with the EIS in fact states the opposite and notes that there are no biodiversity values within the development site. The City questions why this area has not been identified in any consultant's reports and responded to accordingly. In light of this, it is suggested that the biodiversity values identified be reviewed and context provided and that the design of the "educational lagoon" in this area be reviewed.	Noted
		The ESD report further states "an education water area is proposed including a living aquatic wall to support marine diversity". Given the long history of water and sediment contamination within Blackwattle Bay, the City seeks clarification as to whether consideration has been given to installing permanent water quality monitoring equipment at the water front	INSW are currently working with Eco Logical and other organisations to see what potential permanent structure can be used on the site that can be used also as an educational tool.

		public domain area and public display of water quality data as a practical real-world education opportunity.	
9	Public Art Strategy	<p>The City recommends that the current Public Art Strategy not be approved as part of any future consent and that a Preliminary Public Art Plan be prepared by the applicant and approved prior to the commencement of any work. It is recommended that the Plan include:</p> <ul style="list-style-type: none"> a) Detailed historical analysis and future vision for the precinct to aid the preparation of artists briefs; b) A methodology for the selection and commissioning of artists; c) Indication of the appointment of a curator to guide the artist selection process and/or the appointment of an Indigenous curator to assist with the selection of Aboriginal and other artists; d) An estimated budget for the proposed suite of artworks; and e) A program for the development of artworks and inclusion of artists. <p>Prior to the approval of any future Public Art Plan, it is recommended that the applicant presents the project to the City's Public Art Advisory Panel to obtain advice and guidance.</p>	INSW are working with public art consultant Wallner Weiss, the design team and the heritage specialists including City Plan, Comber (Marine Heritage) and Artefact (Aboriginal Heritage) to ensure that a robust public art strategy is prepared. INSW do not agree to share the estimated budget for Public Art.
10	Exhibition Strategy	The proposed preliminary exhibition strategy is considered satisfactory at this stage of the application. The option to use the southeast lower ground floor space as a lecture theatre is not supported given this is not considered to be an 'active use'. It is recommended that options to include the northeast exhibition space in the public art strategy be investigated.	Noted
11	Signage	The City acknowledges the submission of a Signage Strategy as part of the RtS. The Strategy is generally supported and is recommended that a final Strategy be submitted and approved prior to the commencement of works.	Noted

Appendix B – TreelQ Letter responding to City of Sydney Tree Management recommended conditions

20th April 2020

Infrastructure NSW
Attn: Jennifer Chang
Services Building G12
Level 12, MLC Centre
19 Martin Place
Sydney NSW 2000

RE: Bridge Road Improvements, Pyrmont
Arboricultural Impact Assessment

Dear Jennifer

I have reviewed the City of Sydney Correspondence dated 6th April 2020 (Section 7 – Tree Management) and can confirm that our Arboricultural Impact Assessment & Tree Protection Specification (dated 26th June 2019) fully addresses the concerns raised by the City of Sydney.

No root mapping was undertaken as the road and footpath are to be raised. Roots under the existing footpath are to be retained and protected. The Arboricultural Impact Assessment & Tree Protection Specification also provides a detailed methodology for undertaking demolition works, pit decommissioning, construction of footpath and kerbs, installation of underground services, and alteration to the park wall and stairs (if required) within the TPZ areas.

In relation to the comments regarding the pruning works for vehicular clearances, Appendix 4 of the Arboricultural Impact Assessment & Tree Protection Specification provides a detailed Pruning Specification (identifying individual branches to be pruned). In general, the pruning works will account for approximately 2-4% and a maximum of 10% of the total crown volume.

The above issues were discussed with Karen Sweeney (City of Sydney's Urban Forest Manager) on the 9th April 2020. During this telephone conversation, Ms Sweeney noted that the above issues appear to have been addressed within the Arboricultural Impact Assessment & Tree Protection Specification and the comments may have related to a previous Arboricultural Report or were prepared by a staff member outside of the Tree Management Team. She has requested that the most recent Traffic Signals Plans for the Wattle Street and Wentworth Park Road intersections be reviewed by the Project Arborist and any additional proposed pruning works be outlined for assessment by the City of Sydney.

TreeiQ has now received the Traffic Signals Plans for the Wattle Street and Wentworth Park Road intersections and can confirm the following additional pruning works will be required:

Tree 14WP – Reduction Pruning of higher order branches (<25mm) at approximately 5m. Total pruning works for tree will account for approximately 2% of total crown volume.

Tree 15WP – Selective Pruning 1x 150mm branch at approximately 4m. Total pruning works for tree will account for approximately 10% of total crown volume. Refer to Figure below.



Please do not hesitate to contact me should you require any additional information.

Yours sincerely,

Handwritten signature of Anna Hopwood.

Anna Hopwood-Director
Grad Cert. (Arboriculture)
Dip. Hort (Arboriculture)
Dip. Hort (Landscape Design)

