

2210545

16 November 2022

Mr Michael Cassel
Secretary
NSW Department of Planning and Environment
4 Parramatta Square
Parramatta NSW 2150

Attention: Amy Watson (Team Leader, Key Site Assessments)

**Powerhouse Ultimo Renewal – Concept State Significant Development Application (SSD-32927319)
Response to Further Submissions**

This letter is prepared on behalf of the Applicant for SSD32927319 (Powerhouse Ultimo Renewal) in response to matters raised in relation to the Response to Submissions by government agencies. A detailed response to the matters raised in submission received from the following government agencies is provided in **Attachment 1**:

- City of Sydney Council
- Heritage NSW
- Department of Planning and Environment- Environment and Energy Group.

The responses in **Attachment 1** should be read in conjunction with the Response to Submissions and Amended Proposal Report prepared by Ethos Urban and accompanying information dated 20 September 2022.

The responses provided in **Attachment 1** do not give rise to the need to revise the description of the development or any of the Mitigation Measures for the project. Should you require clarification regarding the above or in relation to any other matter relating to this project, please do not hesitate to contact the undersigned.

Kind regards,



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Attachment 1 – Response to Submissions

Extracts from public authority submissions, received in relation to SSD- 32927319 and a response to each of these matters has been provided in the sections below.

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1.0 Public authorities

1.1 City of Sydney

No.	Extract	Comment
COS -1	<p>The City recommends that further analysis is required to determine the appropriate form of envelopes. Further analysis should include:</p> <ul style="list-style-type: none">• a figure-ground diagram of Harris Street to understand the spatial structure along Harris street, around the site and along the peninsula• the pattern of civic buildings and spaces in the peninsula• an elevation of the buildings on the opposite sides of the streets that surround the Powerhouse Street block• the view corridors across the peninsula not just views to the site	<p>The proposed envelopes are consistent with the planning controls contained in the Sydney LEP 2012 and DCP 2012.</p> <p>The analysis requested has been supplied in Response to Submissions and was utilised to inform the revised envelopes (refer to section 1 of Appendix D to the Response to Submissions).</p>
COS -2	<p>The City believes the RtS, particularly the revised building envelopes and Urban Design Guidelines, only go part way in ensuring any future development will have a satisfactory urban design outcome. To ensure that any future development</p>	<p>The revised Urban Design Guidelines comprise 'key moves' supported by detailed guidelines. Further principles in addition to the key moves and guidelines is not considered necessary. The Guidelines as revised provide sufficient controls to ensure protection and enhancement of heritage buildings on the site and for the future Stage 2 Detailed State</p>

No.	Extract	Comment
	enhances the heritage buildings on site, the spatial organisation and architectural resolution must be addressed, and a set of clear principles adopted.	Significant Development Application to demonstrate satisfactory urban design as suggested by Council. The Response to Submissions sets out how the proposed concept plan exhibits design excellence. Furthermore, the revised Guidelines allow for the requisite flexibility for design excellence to be achieved as part of the design competition for the future Stage 2 Detailed State Significant Development Application. Detailed architectural proposals will be the subject of assessment as part of the future Stage 2 Detailed State Significant Development Application.
COS -3	<p>Site Analysis</p> <ul style="list-style-type: none"> Further analysis should include details as recommended in Section 1.1 above. The spatial character section should address spaces in plan, section and levels. 	<p>The envelopes are consistent with the planning controls contained in the Sydney LEP 2012 and DCP 2012, along with the analysis and objectives outlined in the Pyrmont Peninsula Place Strategy and the Ultimo sub-precinct master plan.</p> <p>Further analysis supported the Response to Submissions that included the requested information and informed the revised envelopes.</p> <p>The spatial character section provides sufficient information to analyse the spaces for the purposes of a stage 1 SSD and to inform the development of the Guidelines. The requested information of 'plan, section and levels' is contained within the document.</p> <p>Plans, sections and levels have been submitted for the proposed envelopes the subject of this application. Plans, sections and levels for the spatial character of the future Stage 2 Detailed State Significant Development Application will be submitted with that application.</p>
COS -4	<p>Key Moves</p> <p>To ensure that the outcome 'reveals and celebrate heritage fabric and spaces' there should be a clear set of principles. These need to address the spatial organisation and the resolution of the architecture.</p>	<p>The revised Urban Design Guidelines responded to feedback provided within the City's submission to the EIS.</p> <p>The revised Urban Design Guidelines comprise 'key moves' supported by detailed guidelines. Further principles in addition to the key moves and guidelines is not considered necessary. See response to COS-2 above.</p>
COS -5	<p>Urban Design Guidelines</p> <ul style="list-style-type: none"> The guidelines are still very general and don't address the philosophical approach to the site, the spatial organisation of the site or the resolution of the architecture. For example, the Guidelines Zone 1 do not address the 'real' space. The 'space' coloured green on the plan p. 57 is not the actual 'space'. The actual 'space' has different levels and includes land to the south and east. All the public 'space' indicated requires greater design consideration in plan, section and levels, if it is to have more meaning than simply as 'left over' space. The Guidelines Zone 2 address alignment of buildings but do not address the requirement to have vertical walls without cantilevers. An intervention such as the Boola Bardip Western Australia Museum is not considered appropriate. <p>The Urban Design Guidelines should be accompanied by a set of principles.</p>	<ul style="list-style-type: none"> The revised Urban Design Guidelines responded to feedback provided within the City's submission to the EIS and provide sufficient direction and control for the future development the subject of the Stage 2 Detailed State Significant Development Application. The Guidelines for Zone 1 relate to the control and direction to be achieved for the future design of this space. Zone 1 includes all land that is the subject of the application in this portion of the site. The purpose of the Guidelines is not to design the space nor provide prescriptive controls for the future design. Rather the guidelines provide the direction for the future design along with any mandatory inclusions or exclusions. The inclusion of plans, sections and levels of the existing condition is not considered necessary. The concept proposal provides for a minimum public domain area of 2,200 sqm. The guidelines contain principles for the delivery of this open space but the actual design of these spaces in accordance with these principles will be the subject of the future Stage 2 Detailed State Significant Development Application. There is no applicable planning requirement that prohibits the use of cantilevers in building design at this site. This level of detailed architectural design is best considered to be the subject of interrogation in the detailed design process and

No.	Extract	Comment
		<p>would be subject to assessment as part of the future Stage 2 Detailed State Significant Development Application.</p> <ul style="list-style-type: none"> Noted.
<p>COS -6</p>	<p>1.3 Reference design</p> <p>The City notes the extent of building envelopes have been amended to clarify that no new buildings are proposed above the existing State Heritage Items and support this amendment.</p> <p>Although not forming part of any future consent granted in this application, the City reiterates the issue of the lack of detail provided in the submitted reference design.</p> <p>The reference design is important in demonstrating potential impacts, in demonstrating the application of design principles, and identifying potential opportunities and constraints. The City maintains that the reference design could better respond to the Secretary's Environmental Assessment Requirements including a Visual Analysis and Visual Impact Assessment to provide explanation and illustration of the future built form including a detailed context analysis of the Powerhouse museum buildings, their setting and views. Overall, a building of the extent proposed in the reference design could have a negative impact upon the heritage significance of the Powerhouse Museum, including its setting and views. We reiterate that the following parcels of land identified in Schedule 5 of the Sydney Local Environmental Plan 2012 provide important visual curtilage around the heritage buildings and that insufficient justification has been provided for proposing a footprint extending over these parcels of land:</p> <ul style="list-style-type: none"> A section of the Harris Street forecourt being the parcel of land extending from Harris Street to the Switch House, and the parcel of land extending to Macarthur Street along the entire length of the Switch House Zone 1 being the southeast courtyard and associated Goods Line rail tracks; The parcel of land to the northwest of the Boiler House extending to Pier Street and including the Pump House. 	<p>The reference design does not form part of the application and therefore assessment of it for the purposes of determining impacts of the development is not applicable. The additional matters raised by Council are most appropriately assessed when a specific architectural proposal is detailed in the future Stage 2 Detailed State Significant Development Application.</p> <p>As outlined in the Response to Submissions, the local heritage listing applies to the items as described in the listing in the Sydney LEP, and not the entirety of the identified lots. In respect of the specific areas identified in this submission:</p> <ul style="list-style-type: none"> The Urban Design Guidelines requires that future development “<i>enhance views and connections to heritage-listed items through the zone</i>”, which will achieve the intent of this submission in respect of visual curtilage without unduly restricting or defining particular locations in which this would be achieved. Refer to Section 3.9 of the Urban Design Guidelines, 'Revealing Heritage'. Zone 3 is identified in the Pyrmont Peninsula Place Strategy and Ultimo Sub-Precinct Master Plan as potentially facilitating future connection through to Pyrmont Street and the Exhibition Centre Light Rail Station.
<p>COS -7</p>	<p>2.1 Potential extent of demolition</p> <p>Greater detail is required as to the gradings of significance in the Conservation Management Plan (CMP). Gradings should be represented in three dimensions, including through inclusion of building sections, elevations, and reflected ceiling plans. More detail is required as to the relative significance of smaller components to be demolished should be provided.</p>	<p>The revised CMP provided with the Response to Submissions provides the requisite information in relation to gradings of significance along with the elements to be retained as part of the future design of the project. The Concept Proposal does not seek consent for any physical works at this stage, including demolition. Any specific proposals for alteration or removal of fabric would be subject to a detailed Heritage Impact Statement provided as part of the future Stage 2 Detailed Development Application.</p>
<p>COS -8</p>	<p>2.2 Heritage core</p> <p>As earlier stated, the City supports the amended building envelopes as provided in Appendix C of the RtS as they remove any proposed building envelope above the State and Local Heritage Items (except in the location of the existing rooftop</p>	<p>The concept proposal provides for a maximum building envelope to support the future development the subject of the Stage 2 Detailed State Significant Development Application. The envelope as amended minimises impacts on heritage fabric. Detailed Justification for</p>

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	<p>mezzanine addition above the Switch House) clarifying that no new buildings are proposed in these zones.</p> <p>However, the City maintains that any proposed building envelope above additional parcels of land should be carefully considered or minimised, and that to date, insufficient justification has been provided for proposing additional height over these parcels of land.</p> <p>These parcels of land include:</p> <ul style="list-style-type: none"> • The whole of Lot 1, DP 631345 identified in the Sydney Local Environmental Plan 2012 Schedule • The above includes a section of the Harris Street forecourt extending from Harris Street through to the Switch House • A section of the Harris Street forecourt being the parcel of land extending from Harris Street to the Switch House, and the parcel of land extending to Macarthur Street along the entire length of the Switch House. • Zone 1 being the southeast courtyard and associated Goods Line rail tracks. Any built form over the south eastern courtyard and the goods tracks could have a negative impact on the heritage listed buildings both in terms of views, setting and visual curtilage. • The parcel of land to the northwest of the Boiler House extending to Pier Street and including the Pump House. 	<p>the concept proposal has been provided including in respect of the proposed envelopes (see Section 8.0 of the EIS and Section 5.1 of the Submissions and Amendment Report).]</p> <p>As outlined in the Response to Submissions, the heritage listing within the LEP does not apply to the whole of Lot 1 DP631345. Nor does the listing within the LEP provide justification for the City maintaining that development should be restricted in the areas mentioned.</p> <p>[</p>
COS -9	<p>Our previous submission separately highlighted the significance of the views from Harris Street to the historic core that retains the legibility of the heritage items, and this retention of views was an important attribute of the 1980s Powerhouse Museum design. Although the Powerhouse buildings, historically, did not have a frontage to Harris Street, today the existing urban arrangement and the visual relationship between the Switch House which is of exceptional heritage significance, and the dramatic southeast elevation of the Wran Building (identified in the draft CMP as being of high heritage significance), are positive and established in the streetscape as being part of the Powerhouse Museum.</p>	<p>Protection of views to the heritage core (including views from Harris Street) are already adequately provided for within the revised Guidelines. Specifically, Section 3.10 states that <i>“The design must... Enhance views and connections to heritage-listed items through the zone.... Reinforce the relationship of the heritage listed items to the suburb of Ultimo through visual and physical connections”</i>.</p>
COS -10	<p>The Guidelines should be updated to reference the need for an entry point on Harris Street particularly for groups arriving by buses, coaches and taxis.</p>	<p>The requirement for an entry from Harris Street is included within the Guidelines- refer to Section 3.10 at page 73. The requirements for bus and coach drop off is included on page 74.</p>
COS -11	<p>It is noted that the revised Urban Design Guidelines in Appendix D specifically require views to the state listed heritage buildings and that the Stage 2 Detailed Design application will need to demonstrate how these views have been adequately addressed. However, additional views to those identified should include:</p> <ul style="list-style-type: none"> • Views from the southeast courtyard and associated Goods Line rail tracks to the heritage core. • Views from Harris Street through to the heritage core and to the Wran building. 	<p>The requirement for retention and/or enhancement of views to the heritage core from these vantage points are covered within the Guidelines. In addition to other references within the Guidelines, Sections 3.9 (Zone 1) and 3.10 (Zone 2) specifically state that <i>“The design must... Enhance views and connections to heritage-listed items through the zone.... Reinforce the relationship of the heritage listed items to the suburb of Ultimo through visual and physical connections”</i>.</p>

No.	Extract	Comment
	<ul style="list-style-type: none"> Views from Harris Street and Macarthur Street to the Switch House and to the southeast courtyard. 	
COS -12	<p>2.3 Heritage curtilage analysis</p> <p>The City of Sydney maintains that the curtilage analysis is insufficient, as it does not take into account the broader visual context of the heritage listed buildings that is necessary to retain their significance, nor does it take into account the broader visual context of the Wran Building which is identified in the draft CMP as being of high heritage significance.</p>	<p>The visual context of the heritage listed buildings has been assessed under the Heritage Impact Statement. The broader visual context of the Wran Building is also considered in that assessment including in the context of whether it remains on the site.</p> <p>Section 2.2 of the Heritage Impact Statement outlines the State Heritage Register curtilage in accordance with the listing. As the listing was subject to assessment and gazetted recently (August 2020) it is considered valid and a contemporary reflection of the heritage values of the site.</p> <p>The Wran Building is assessed as being of moderate significance under the CMP- refer to Figure 4.30.</p>
COS -13	<p>The majority of the City's comments regarding the Draft Conservation Management Plan have not been sufficiently addressed in the amended report. On this basis, the CMP should be peer reviewed by a heritage architectural firm with relevant experience.</p> <p>It is important that the CMP is a well-structured, comprehensive document that conveys information about the site in a concise and clear manner, including to the participants of the ongoing design competition. It is important that the building and its values are understood in three dimensions through the inclusion of elevations and sections in addition to floor plans.</p> <p>The City disagrees with the statement in response to our previous submission in regards the achievement of the Sulman Medal. The recognition of architectural merit entailed in the award of the medal is significant. The Powerhouse Museum project of the 1980s achieved a careful architectural integration of new and existing buildings on the site, to create a place that has inspired future adaptive re use projects across Australia. If it were not so compelling, these buildings would have been demolished. The role of an updated CMP is to re-evaluate the significance of a place, as new evidence comes to light, not only documentary and physical evidence, but also comparative values.</p>	<p>The majority of the City's comments in regard to the CMP relate to the style of the document. As noted in the Response to Submissions:</p> <p><i>Article 6 of the Australian ICOMOS Burra Charter outlines a process for developing conservation management plans, however, it does not dictate or require such plans be within a prescribed structure.</i></p> <p><i>Similarly, JS Kerr's 'The Conservation Plan' 7th Edition also outlines a process for developing conservation management plans, it does not dictate or require such plans be within a prescribed structure.</i></p> <p><i>The process required to be followed in the development of a conservation management plan within the Burra Charter and 'The Conservation Plan' 7th Edition has been followed.</i></p> <p>The CMP has been authored by appropriately qualified heritage experts, with the requisite skills and expertise as required by the <i>Guidance on Developing a Conservation Management Plan</i>, Heritage Council NSW 2021. There is no basis for a requirement for a peer review nor has sufficient justification been provided for such a requirement in the context of this CMP.</p> <p>It is recognised that the development of the museum was the recipient of the RAIA Sulman Medal, however this is an architectural recognition by a non-government body that does not have any legislative status nor does it equate to either a heritage listing or heritage significance. The Conservation Management Plan is not the document in which the recognition of architectural merit needs to be fully reproduced. In any event, the CMP does reference that the redesign of the Powerhouse into a museum won the Sulman Award. Adequate references have been made should readers wish to conduct research that is beyond the scope of the CMP.</p>
COS -15	<p>The response provided in the RtS in relation to landscaping within the site, deep soil and canopy coverage is considered unsatisfactory and the City's comments and concerns as raised in our previous submission remain.</p>	<p>A commitment for deep soil planting to be at a minimum of 5% has been made as part of the Response to Submissions, which is significantly more than the current 0.18% of deep soil</p>

No.	Extract	Comment
	<p>It is noted that there has been no change in the Urban Design Analysis and Guidelines in stressing the importance of site greening and canopy increase despite it being a NSW Government priority. Although the detailed response to submissions document in Appendix A suggests that the Urban Design Guidelines have been updated to include recommendations for minimum deep soil requirements, no such recommendation is made. Similarly, the Guidelines do not clearly set out any commitment to planting shade trees to meet urban canopy targets or to provide any greening on the roof of any new addition</p> <p>The Guidelines do not provide sufficient benchmarks or expectations that assist in guiding the ongoing design competition or a future detailed design application to demonstrate a commitment to creating public realm and open spaces with adequate shade trees planted in deep soil, species selection and layout with civic quality for gathering, wayfinding and use, nor provision of inaccessible and extensive green roofs.</p> <p>The design guidelines do not meet basic planning controls for a climate responsive design and is not supported from a landscape perspective.</p>	<p>within the site. No works are proposed under the concept plan and detailed landscape works will be the subject of the Stage 2 SSD.</p> <p>Provision for green roofs to be considered as part of the design competition is included at p73 of the revised Guidelines.</p> <p>Species selection, including 'shade trees' can be considered as part of the design development for the Stage 2 SSD.</p> <p>As set out in the Amendment report, the commitment to deep soil landscaping and the minimum public open space requirement will assist to increase tree canopy cover of the site compared to the existing landscape.</p> <p>Refer to section 3.6 of the Guidelines. The Guidelines include a minimum 5 Star Green Star rating with a target for a 6 star rating which requires consideration of climate responsiveness and of nature.</p>
COS -16	<p>Transport and access</p> <p>The City notes the submission of the addendum to the transport assessment in Appendix J and comments provided by Transport for NSW in support of a collaborative design approach to any upgrades to pedestrian connections to the site via the Goods Line or from the Exhibition Centre Light Rail stop. The assessment report notes that any proposed new connection would be agreed with Transport for NSW and would be the subject of a new development application however, the City stresses the importance of providing those connections concurrently with the Powerhouse renewal project.</p>	Noted
COS -17	<p>It is recommended that any future detailed application that includes a new connection adjacent to the Boiler House and/or upgrades to the Goods Line conduct an adequate investigation and coordinated design with Transport for NSW and Council prior to the lodgement of the detailed application.</p>	As outlined in the Response to Submissions, further discussion regarding connections will take place with Transport for NSW and Council as part of the Stage 2 SSD. It is noted that the connection is not on land that is subject to this application, nor is it required to provide adequate servicing of the development.
COS -18	<p>5 Public Art</p> <p>It is recommended that a more comprehensive, updated plan be submitted with any detailed design application.</p>	The Applicant has no objection to this being a condition of consent.

1.2 Heritage NSW

No.	Extract	Comment
HNS W-1	<p>It is noted that a maximum increase amount of GFA of 10,000 square metres is proposed with at least 2,200 square meters of public space envisaged around the development. It is recommended that all public domain areas enhance existing views and promote public interaction with the historic character of the building complex and its surroundings. As noted previously, it is recommended that the</p>	As outlined in the Response to Submissions (Appendix D, section 3.2) open spaces are to be designed to permit solar access and minimise overshadowing. The requirement to meet these criteria could not be met with significant built form above the space/s. Further a requirement for 'open-to-sky' for the entirety of the spaces would prevent landscape

No.	Extract	Comment
	public domain areas remain as open-to-sky without the burden of built-up areas above.	elements such as shade structures that may be conducive to creating usable and welcoming public spaces.
HNS W-2	The removal of the proposed extension to the building envelope, above the Boiler House and Turbine Hall/ Engine Room, North Annex and the Ultimo Post Office are noted. It is considered that any new proposed works within the heritage core zone of the subject site would be subject to further comment and discussion during the Stage 2 Detailed SSDA.	Noted.
HNS W-3	The separation of the Switch House into a separate zone to allow a possible extension above is noted. While the proposed building envelope above the Switch House has been revised, it is recommended that any future works are mindful of historic fabric and character of the building. Any proposed extensions should be designed to be recessive and represent a clear articulation or transition between the historic core and any contemporary intervention. It is considered that any amendments and possible alterations to fabric within and above the Switch House would require a detailed assessment against impacts to the significant values and fabric during the Stage 2 Detailed SSDA.	Noted.
HNS W-4	The Approvals Committee, at its meeting on 2 August 2022, noted that the significance assessment for the Wran Building has not yet been completed by the State Heritage Register Committee (SHRC). It was advised that the proponents consider in their design planning the possibility of the building being of state significance. It was also noted that the National Trust has submitted a nomination to list the entire site including the Wran Building on the State Heritage Register.	As outlined in the Response to Submissions, the heritage significance was considered recently by the NSW Heritage Council (August 2022) resulting in the listing of the Power Station buildings. A review of State Heritage Register Committee (SHRC) meeting minutes since February 2020 has been undertaken. No reference to active consideration by either the Heritage Council or Heritage NSW in undertaking work to assess the significance of the Wran Building can be found. It is noted that the September 2020 minutes of the NSW Heritage Council mention a desire by the SHRC to include the Harwood Building within the Power Station listing, however this was ultimately rejected by the Council. It is understood that the SHRC is progressing a 'Modernism and Seidler Working Group,' however the priorities for listing under this working group do not include the Wran Building.
HNS W-5	The Conservation Management Plan (CMP) and Statement of Heritage Impact do not attach substantial value (historical, associative, aesthetic, social, representative) to the Wran Building. It is also noted that the proposal documentation indicates that substantial change may be envisaged for the Wran building as part of Stage 2 Detailed SSDA. It is reiterated that the significance of the building is still under consideration by the SHRC. Any proposal for the future of the building should take into consideration the possibility that the SHRC may determine that the building is of State significance and make a recommendation accordingly under the Heritage Act 1977. A determination may intersect any potential plans for substantial intervention or demolition at Stage 2 Detailed SSDA.	A review of State Heritage Register Committee (SHRC) meeting minutes since February 2020 has been undertaken. No reference to active consideration by either the Heritage Council or Heritage NSW in undertaking work to assess the significance of the Wran Building can be found. It is understood that the SHRC is progressing a 'Modernism and Seidler Working Group,' however the priorities for listing under this working group do not include the Wran Building.
HNS W-6	The revised CMP includes an updated statement of significance that includes further emphasis on the social significance of the building and mentions the 1980s conversion of the Powerhouse Museum. This is considered a positive improvement; however this revised statement of significance does not translate into an increased	Noted.

No.	Extract	Comment
	protection of the 1980s layers of the building complex. Further deliberations may be required during Stage 2 Detailed SSDA to determine the extent of change that may be permissible to these segments of the subject place.	
HNS W-7	We note that the revised CMP text recognises the Ultimo Post Office as being of exceptional significance. However, the significance diagram on page 86 identifies the post office as being of high significance rather than exceptional. It is recommended that the CMP diagram be updated to reflect the exceptional value attached to the post office zone.	The diagram at Page 86 of the CMP has been updated- refer to Attachment 2.
HNS W-8	While the applicant has indicated that the Stage 2 Detailed Design proposal would be consistent with the policies of CMP, it should be noted that the CMP has not been endorsed by Heritage Council of NSW, or its delegate. Any future applications for the site will be assessed on their merits and with consideration to the State Heritage Register listing.	Noted.
HNS W-9	The submitted addendum for Historic Archaeology has been reviewed. It is recommended that the original archaeological assessment be updated to reflect the most recent findings. It is also recommended that consideration be given to any potential maritime archaeological resources that may possibly exist at the site given the extent of land reclamation undertaken in the vicinity.	Noted- the Applicant has no objection to a condition of consent to this effect.
HNS W-10	As the site contains a local heritage item, and other local items are in the vicinity, advice should be sought from the relevant local council.	Noted- this has occurred.

1.3 Environment and Heritage Group- Department of Environment and Planning

No.	Extract	Comment
EHG -1	The flood impact assessment must be updated to show impacts greater than 0.01m or 10mm, the generally accepted limitation of accurate modelling.	The flood model has been updated to demonstrate the impacts in 10mm increments. The model shows minor increases in afflux that can be managed satisfactorily during the development of the Stage 2 SSDA. Refer to Attachment 3. It is noted that the flood model has assessed the full extent of the proposed envelopes. This is a conservative assessment of impacts, as the design that will be subject to the Stage 2 SSDA will not contain built form across the ground plane across this full extent.
EHG -2	The development of Zone 3 (the northeast corner) is predicted to cause unacceptable flood impacts. Consideration should be given to retaining this area at existing ground levels or reducing the planned extent of the building to avoid impacts. It is not considered reasonable to proceed based on the predicted impacts. The feasibility of any proposed mitigation measure must be shown, noting that stormwater upgrades in this environment even if feasible, would likely be costly.	As outlined in the attached, the existing flood model did not account for the existing brick wall that separates Zone 3 from the surrounding area. As such, with all existing remnants of the Pump House being retained (including this brick wall) there will be no change in the behaviour of flood as a result of the envelope within Zone 3.

No.	Extract	Comment
EHG -3	The flood model does not appear to adequately represent the wall along the eastern boundary of the project site. This type of detail is typically not included in flood studies completed at a regional scale, such as City of Sydney Council's Darling Harbour study. This level of detail should be included in the site-specific assessment for the project.	This wall has been included within the revised flood model and no changes to the impacts of the development have resulted from this inclusion- refer to the attached.
