

27 August 2014

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Cameron Sargent
Team Leader
NSW Planning and Environment
22-33 Bridge Street
SYDNEY NSW 2000

Attention: Sara Roach, Senior Planner
sara.roach@planning.nsw.gov.au

Dear Sara,

RE: SSD 6069 – Walsh Bay Arts Precinct Stage 1 Concept DA

I refer to Planning & Infrastructure's recent exhibition of an Environmental Impact Statement (EIS) for a Stage 1 SSDA seeking "in principle" approval for the upgrade and augmentation of select piers, finger wharves and shore sheds in Walsh Bay associated with arts and cultural stakeholders.

This submission comprises the City of Sydney's (the City's) comments on the proposed public domain, heritage, transport and environmental issues associated with the Stage 1 DA.

The City is supportive of the overall concept for the Walsh Bay Arts Precinct.

The following issues are raised for the Agency's and Applicant's consideration.

Public Domain

In designing the next stages of the development, the City encourages the Applicant and their architects to incorporate features which demonstrate that the precinct is clearly open to the public and that no one area is exclusive to any particular tenant or user. The following matters are raised as examples:

- Public toilet facilities should be easily accessible around the shore sheds and western ends of the wharfs;
- Wayfinding signage should be incorporated at the site interface to direct visitors to the relevant spaces;
- Cafe, restaurant or bar outdoor seating should not be segregated via bollards or rope from the surrounding public walkways/thoroughfares;
- Cafe, restaurant or bar umbrellas should be unbranded and should adopt a consistent palette; and
- Cafe, restaurant or bar seating should adopt a consistent palette.

A set of concise Public Domain Guidelines covering public furniture, tenant furniture, signage and the like is suggested.

Heritage Issues

The concept is supported in principle from a heritage perspective. However, the concept will need further resolution to reduce potential adverse heritage impacts particularly in relation to the Australian Chamber Orchestra Auditorium, the Waterfront Square, opening the northern most bay of Pier 2/3, new fit-outs and the introduction of new services and amenities.

The City requests that the following requirements be made conditions upon any approval for the DA:

- Future design development is aimed at minimising adverse heritage impacts identified in the submitted Heritage Assessment by Design 5 Architects and being carried out in accordance with the policies of the relevant CMPs for the site;
- The engagement of a suitably experienced and qualified heritage architect throughout the design and development process;
- A heritage impact statement prepared by a suitably qualified and experienced heritage consultant for each stage of the concept;
- An archival recording of the place be carried out in accordance with NSW Heritage Division guidelines prior to any works being carried out;
- Address archaeological issues as indicated in the Stage 1 Heritage Impact Assessment;
- Sensitive introduction of new services with minimal impact on significant fabric and spaces;
- A detailed interpretation plan, which is to include the use of moveable heritage, be prepared as an integral part of the detailed design, with all interpretation and display of moveable heritage being in accordance with the detailed heritage interpretation plan which is to be approved by NSW Heritage;
- The design of the ACO Auditorium being carefully and sensitively considered to minimise the impact of removal of columns, on changes to significant fabric, on the Commercial Events/Art Space below and changes to the roof;
- Investigate the least-impact option in relation to opening up the northern most bay on the east and west elevations of Pier 2/3 - altering existing weatherboards to become adjustable louvers, which will be open most of the time, will have a high visual impact;
- The Commercial Events/Arts Space be designed such that all amenities and ancillary rooms are reversible and the full height and openness of the space being retained, with any partitions or screens to be temporary and not appearing permanent. The space should be not be modified to accommodate a fully controlled air-conditioned environment;
- The design of the Waterfront Square being subject to further development and detail to reduce impact. This is to include adequate delineation of aprons and the square through measures such as the use of different materials. The cover needs to be sympathetic and respectful of the industrial character of the place as well as being a design of high quality;
- Removing the detracting skylight on the external slopes of the south end of Pier 2/3; and
- An External Signage Strategy being prepared that ties in with the signage within the rest of the precinct.

Traffic and Access Issues

The City is concerned that the SSDA Concept does not include an assessment of the likely measures that will be necessary to manage pedestrians and vehicles during 'event mode' within the Precinct. The cumulative spatial, safety and parking demands of the proposed increased range of day-to-day cultural and commercial uses (as assessed), coupled with new events both in the new public realm and expanded private realm (not assessed), should be qualified to ensure that components of the project, like the new waterfront square, are viable propositions.

The Traffic Management and Accessibility Report (TMAP) lodged with the application already estimates that car parking demand will increase substantially from the day-to-day activities within the Precinct (the demands of which may or may not be absorbed by the future Barangaroo Headland Park car park) and a Green Travel Plan and Travel Guide will be necessary to manage modal split targets.

The TMAP says that a separate future application will be lodged for the operation of the Precinct during event mode. The TMAP consultant predicts that a Transport Management Plan will be prepared for the site during event mode. However, there may need to be a scaling back of the concept or physical changes to the proposed layout to accommodate the day-to-day and event visitations. Transport demand modelling should be undertaken for predicted visitors and for predicted modal share at this stage so that the Concept Plan assessment is better informed.

For example, when approximately 10,000 visitors arrive to the precinct per day for the Sydney Writers Festival (TMAP, page 22), on a day with a major event in the waterfront square, plus a day when the various cultural institutions have sell-out performances, what will be required to get people there, move people around and get them home? What mode split targets and measures need to be adopted, and are these realistic, during such worst-case scenario?

By way of example the City would not determine a Stage 1 DA for a new office tower in the CBD, without an understanding of the full range of traffic and access issues associated with the development. A project at concept stage especially requires great scrutiny in relation to impacts as any concept approval later becomes immutable grounds for support in latter stages.

Environmental Issues

The proposal will incorporate various changes which will have potential noise implications for the surrounding environment unless treated appropriately. The expected noise sources have been identified within the acoustic report prepared by WSP report dated 24 June 2014 and are listed below:

1. New rehearsal spaces located on the west façade of Pier 2/3 and two on the east façade. These spaces have are proposed to have operable louvers that can be opened or closed when needed. Alternative ventilation will be provided to ensure the room may operate in a 'sealed' mode;
2. Noise from the new performance spaces within Pier 2/3. These new performance spaces are not expected to be significant as these are fully sealed internal spaces with controlled acoustic environments. Building fabric will be designed to mitigate these noise sources;
3. New plant equipment will be located on the roof of Pier 2/3;
4. Noise from new commercial spaces throughout the precinct; and
5. Events held in the Waterfront Square.

The Acoustic Report does not refer to the noise impacts of any construction/demolition or works relating to the site and states that these will be referred to during stage 2 of the proposal.

The site has numerous potentially affected receivers which may be impacted by noise associated with the development. Residential receivers are located as close as 50m from the site, including the Sebel Pier One (<70m). Commercial premises are situated as close as 25m from the proposed uses and as such the potential for noise impacts must be examined.

It is worth noting that the City has previously investigated noise complaints concerning Sydney Dance Company relating to music and patron noise with properties affected along the wharves. This demonstrates the potential for noise issues should the proposed premises (particularly the auditorium and rehearsal spaces) not be adequately examined and where necessary acoustically treated.

Noise from any additional plant and equipment must be adequately addressed to ensure they are located where they will not present a noise issue and are acoustically treated where necessary. The Acoustic Report confirms that a cooling tower is likely to be added to the existing plant which will need to be assessed with regard to potential noise impacts.

The indoor activities associated with the operation of the proposed uses are expected to increase noise at some neighbouring receivers. The report has identified noise mitigation measures including:

- Windows at the source should be closed when noise generating activities are being undertaken;
- Alternative ventilation provided to these spaces to allow them to operate in a 'sealed' manner; and
- The new elements of building fabric (glazing, etc.) will be specified in order to ensure the noise targets are achieved (no site specific measures have been identified within the report at this stage).

The Acoustic Report predicts some noise exceedences at sensitive residential and commercial receivers, either with windows open or windows closed. However, the project noise criteria are likely to be achieved through physical attenuation. It is however recommended that each stage of the concept be subject to performance based modelling.

The acoustic modelling for special events within the precinct is potentially problematic and it would be more appropriate to assess the space on a case-by-case basis for individual events. The event space has the potential to be an issue for residential receivers for more noise intensive events such as musical performances and concerts. Any Stage 2 consent for use of the event space for concerts should be accompanied by noise modelling and commensurate, and realistic, recommendations for attenuation measures.

Working Group

Further to the City's earlier comments on the draft Director-General's Requirements for the project, the City would continue to recommend that a Working Group should be established that meets regularly to discuss design and impact issues. Key Working Group agency representatives should include City of Sydney, Office of Environment and Heritage, Sydney Harbour Foreshore Authority and Transport for NSW.

Should you wish to speak with a Council officer about the above, please contact Russell Hand, Senior Planner, on 9265 9333 or at rhand@cityofsydney.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'GJahn', written in a cursive style.

Graham Jahn AM

Director

City Planning | Development | Transport