



18 December 2020

Ms Emily Dickson
Principal Planning Officer
Key Sites Assessments
Department of Planning, Industry and Environment

By email: Emily.dickson@planning.nsw.gov.au

Dear Ms Dickson

**Environmental Impact Statement, Sirius Development, 2-60 Cumberland Street,
The Rocks – SSD 10384**

Place Management NSW have reviewed the Environmental Impact Statement (EIS) for the restoration and refurbishment of the Sirius Site (State Significant Development Application – SSD 10384) and ask that you consider our comments and recommendation provided in the attached document.

Yours Sincerely

Sarah Cleggett
A/Director, Leasing & Asset Management
Place Management NSW

PMNSW Response to Environmental Impact Statement – SSD 10384

Issue Ref	PMNSW COMMENT	RECOMMENDED CONDITIONS TO DPIE
Design Excellence & retention of Heritage Significant Fabric	The proposed design excellence process and design for the external upgrade of the building is in keeping with the 1970s development and is generally supported.	<p>In keeping with the building's likely significance and best practice conservation management it is recommended that:</p> <ul style="list-style-type: none"> • The significance and strategies of conservation for the Sirius building should be informed by a more comprehensive CMS that outlines the significance of the building in relation to its design philosophy. • The new additions and alterations should be designed to be reversible and removable to retain the integrity of the original 1970s fabric to remain intact so that it can be restored at a later date should this be required. • Some of the internal modernist interior design in the public areas are proposed to be retained which is supported. • All of the original 1970s apartment interiors are all slated for demolition. • Due to the significance, desirability and trending interest in authentic mid-century modernist residential interiors, a selection of say 3-4 apartment interiors and their interior design should be considered for retention and sympathetically restored and upgraded for ongoing residential use. Intact and original 1970s interior design is a rarity and a feature of this development and is likely to attract a premium interest and price.
Heritage Impact Statement (HIS)	The HIS does not assess the impact of the demolition of the interiors and any other options or mitigation for their retention.	<ul style="list-style-type: none"> • The HIS should include the adjoining Ajax building as a building of heritage significance and assess the impacts of the development on this building and site. • The full State Heritage Register nomination should be included as an appendix.
Visual Impact Assessment (VIA)	The VIA is a comprehensive document and its findings on the visual impacts are supported.	Condition to be imposed requiring details to be provided during detail design documentation phase

	<p>The moderate impacts as noted in the VIA are acceptable and do not require any mitigation.</p> <p>The perspectives indicate green walls on the facade facing Gloucester walk - on Soho Style commercial / residential as well as the through link. These are not referenced in the landscaping report or drawings.</p> <p>This green is beneficial to soften the building and improve amenity to Gloucester walk and should be retained</p>	
Historical Archaeological Assessment (Appendix P)	<p>Section 4 does not take into account significant archaeological findings on the sites directly adjacent to the south (Immigration House and Glenmore Hotel), and does not examine the historic photographic evidence indicating the siting and nature of the early 19th century buildings that formerly fronted Gloucester Street (Walk).</p> <ul style="list-style-type: none"> • 2.2.1 does not clearly state that the site <u>is</u> subject to the archaeological requirements of s139 of the Heritage Act since Sirius is not identified as an item on the State Heritage Register (s60) • There is a difference of approximately 4-5 metres between the Cumberland and Gloucester frontages, and it has therefore been assumed by the authors that the bedrock was quarried in relatively modern times. Evidence along this ridge indicates terracing dating from as early as 1820, dividing properties facing Cumberland Street from those fronting Gloucester Street. • The extent of site excavation in the late 1970s for the current building is unclear. The current basement carpark floor is on a similar level with Gloucester Walk. Pre-1900 photographs and other evidence indicates on-grade access from the former houses that stood on this site onto Gloucester Walk (formerly Gloucester 	<ul style="list-style-type: none"> • It is therefore recommended that further archaeological assessment, including historical research, is undertaken for the site, with particular reference to the areas of proposed disturbance. • Assessment should include exploratory test excavation at the earliest convenience to assist in identifying potential archaeological deposits and determining appropriate methodologies for treatment of the resource. All archaeological investigation should be undertaken in accordance with the NSW Heritage Act (1977), Division 9.

	<p>Street). This suggests that archaeological remains of these structures, known to date to at least 1810, may be present on the site. Deep features such as wells and cesspits may extend up to 5 metres below the floor level of the basement carpark.</p> <ul style="list-style-type: none"> • In 1988 excavation for the adjacent Immigration House confirmed structural remains of earlier buildings on the eastern side of the site fronting Gloucester Street. A well, however, was all that was archaeologically excavated, located in the centre of this site where a lift is now located. In 2012 archaeological excavations in the basement of the Glenmore Hotel (Dom Steele Consulting) identified structural remains of cottages that formerly fronted Gloucester Street, and extensive evidence of pre-1912 kerb & guttering, and road surfaces of Gloucester Street prior to the narrowing of the street to form the "Walk". • The Assessment recommends "monitoring" during ground disturbance works; however, test excavation will confirm presence/ absence of State significant archaeology. State significant remains may be required by Heritage NSW to be retained <i>in situ</i>, and therefore lead to delays in construction should re-design be required. 	
Consultation / Public Domain	<p>PMNSW and the Developer have been in consultation regarding the use and upgrade of the public domain. Any works to the public domain or PMNSW owned assets will require Landowners Consent.</p> <p>Lift The location of the lift at Atherden Street as initially proposed by Sirius Developments was not supported by PMNSW. PMNSW and Sirius Development are in discussions to upgrade the existing lift within the Cleland</p>	<p>Lift The detail design and agreement is subject to further consultation, review and approval by PMNSW</p>

	<p>Bond Building at 33 Cleland Street. The proposed improvements will improve access between Cumberland Walk and Playfair Street. Formal agreement will be documented.</p> <p>This is documented on page 58 of the EIS and should be noted.</p> <p>Public Domain Gloucester Walk and Gloucester Street are a PMNSW asset. PMNSW has been in consultation with Sirius Developments and it is agreed that detailed design of the public domain will require review and endorsement before construction works commence.</p> <p>Seating & Bins There is no reference to public seating and bins to service the public domain.</p>	<p>Public Domain The detail design is subject to further development, consultation, review and approval with PMNSW, as communicated to the Developer:</p> <p>A detailed design of the public domain (including a plan showing the type and location of bins, bollards, seating and the like to be installed) shall be submitted to PMNSW for approval prior to the issue of final LOC or CC.</p> <p>Seating & Bins These elements need to be indicated in the detailed design development drawings (including locations & details) to PMNSW approval prior to construction.</p> <p>Note that PMNSW have advised the Developer:</p> <ul style="list-style-type: none"> • The final design of all new seating shall be developed in consultation with PMNSW with details being submitted to PMNSW for approval prior to the issue of final LOC or (CC). • A final detailed seating plan shall be prepared and submitted to PMNSW for review and approval prior to the issue of final LOC or CC with attention being paid to how any seating addresses heritage, retail frontage location and pedestrian circulation considerations.
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	<p>Finishes Gloucester walk - Paving selections nominated are sympathetic with the Rocks precincts and it is noted that selections will be subject to further consultation with Place Management NSW. Pg 73 Gloucester Walk will be updated Cumberland street - paving is noted as large format Bluestone paving to CoS specification</p> <p>Other</p>	<ul style="list-style-type: none"> • Additional public seating to be provided on Gloucester Walk plus new seating on Bunker Hill viewing area with details to be included in the final seating plan referred to in item (b) above. • Although no external seating is currently shown for the retail tenancy, provision is to be made for external seating within the site boundary, as well as potentially external licensed seating in the public domain (subject to separate PMNSW approval). <p>Finishes Details of paving selections and finishes is to be addressed as part of detailed design of the Public Domain and subject to further development, consultation, review and approval by PMNSW.</p> <p>Note that PMNSW have advised the Developer:</p> <p>Future Paving Treatment Details of future paving treatment around the site shall be developed in consultation with PMNSW, with final details being submitted to PMNSW for approval prior to the issue of final LOC or CC. Particular attention shall be paid to the following:</p> <ul style="list-style-type: none"> ▪ The use of smaller paving sizes (modules) from City of Sydney palate to better reflect the Rocks' fine grain character. ▪ Details of specific materials to be used in all public domain areas. ▪ Details of paving treatment proposed for all transition zones. <p>Bicycle Parking Facilities The provision of bicycle parking as part of the Sirius development will be determined by DPIE as part of its assessment of the SSD. Ideally any required bicycle parking generated by the development should be accommodated on site and not within the public domain. Additionally, PMNSW encourages the provision of a small number of bicycle parking spaces in the surrounding public domain (other than on Gloucester</p>
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		<p>Walk), subject to ensuring that visual clutter is reduced and the free flow of pedestrians is not restricted. A plan showing the type and location any proposed bicycle parking in the public domain shall be submitted to PMNSW for approval prior to the issue of final LOC or CC.</p> <p>Signage & wayfinding to be approved by PMNSW</p> <p>Landscaping Plan - A detailed landscaping plan showing the proposed plant selection shall be submitted to PMNSW for review and approval prior to the issue of final LOC or CC. The plan shall also consider how the proposed plant selection contributes to enhancing the natural heritage of The Rocks.</p>
Commercial Premises	<p>Gloucester retail - Design integrity questions the viability of the single retail usage on Gloucester. Sirius Developments suggest this could be a co-working space or other commercial use and note it is to remain a commercial active use</p> <p>Pocket Park The proposed Pocket Park is proposed on PMNSW land, the area is not enough to accommodate a playground with the required fall zones.</p>	<p>PMNSW do not support the use of the area as a playground. Retail would be preferred for activation in this tenancy and this is currently noted in the landscape report to have outdoor dining. If the usage changes to other commercial, there is a requirement to activate beyond the building line with seating</p> <p>Pocket Park PMNSW would support the upgrade of this area to provide enhanced public amenity with increased public seating and improve accessibility. PMNSW would also consider licensing the area as seating to the adjoining retail offering.</p>
Public Art	<p>Our request for additional opportunity for art on Gloucester Walk has been noted as a future opportunity.</p> <p>It is stated that public art for Sirius will be developed in line with the City of Sydney's visions, aspirations, objectives and actions for public art. As the precinct custodian and landowner, PMNSW is a key stakeholder and would like to ensure its inclusion in the public art consultation and</p>	<p>PMNSW, as the landowner within the identified development site and surrounding precinct shall be involved in the further development of the public art strategy to ensure the best possible outcome for the surrounding locality and our stakeholders.</p> <p>On page 16 of the document it is implied that the resultant public artwork/s will become part of the City of Sydney's permanent collection and will align with the City's recommendation for management and maintenance for their collection. As the landowner</p>

	<p>commissioning process so as to align the public art outcomes as closely as possible with PMNSW's vision for the public domain and public art within The Rocks precinct.</p> <p>Page 20 of the document states that the total allocated budget for artist commissioning fees, concept design support, technical design, project management, fabrication and installation will be \$1 million. The strategy also states that it aims to attract quality submissions from local and international artists to deliver two or more pieces by selected artists.</p> <p>It is noted that page 32 refers to a proposed partnership between Sirius and the Museum of Contemporary Art (MCA). PMNSW is seeking to understand if this partnership has been formally agreed upon or is proposed for further discussion.</p>	<p>and precinct custodian, PMNSW is seeking clarity over ownership of the artwork/s and responsibility for management and maintenance for the life cycle of the artwork/s.</p> <p>Additionally, on page 16, the document alludes to the possibility of public art created for Sirius being incorporated into existing City Art projects and programs. PMNSW would like further clarity on which specific projects and programs are being referenced.</p> <p>Public art outcomes for Sirius should be commensurate with the scale of the project, it is a world class location and has architectural and cultural significance. In this regard, PMNSW recommends increasing the allocated public art budget to attract the best local and international artists possible and achieve the desired outcome of two or more quality pieces of public art.</p> <p>PMNSW recommends a calculation of 1.5% of the total Capital Investment Value of the Sirius project to determine the appropriate budget to deliver two or more quality pieces of public art.</p> <p>Recommended calculation:</p> <p>$0.015 \times \\$113,504,887$ (Total CIV) = \$1,702,573.30 (Proposed budget for public art)</p>
Construction Management Plan	<p>The EIS documents identify that there may be some adverse construction impacts on the public domain, including interruptions to pedestrian access and predictions of construction noise exceeding the Noise Management Level at some nearby receivers. It is also noted that the traffic assessment provides high level detail about potential traffic issues and possible management measures associated with construction, stating that "a detailed Construction Traffic Management Plan (CTMP) will be prepared in response to a suitable conditions of</p>	<p>Place Management NSW are to be provided the opportunity to review and comment on and approve the draft detailed Construction Management Plan for the works, with regard to potential impacts to those areas under the control and management of Place Management NSW.</p>

	consent to the SSD application". Although the EIS includes a Construction Management Plan (CMP) that outlines the method of construction that will be implemented, it states that a final CMP version by the appointed construction Contractor will be prepared after the detailed design is complete and will incorporate the specific approved DA Conditions of Consent.	
Crime Prevention Through Environmental Design	<p>The Crime Prevention Through Environmental Design Report (Architectus, 2020) provided design recommendations for the public domain areas of the pocket park and Gloucester Walk, including:</p> <ul style="list-style-type: none"> • vandal resistant materials, fittings and fixtures, including public domain furniture, CCTV cameras, signage and rubbish bins • Lighting of the Pocket Park • Regular trimming of plantings in the Pocket Park and keeping tree canopies on Gloucester Walk several metres above the ground • Maintain cleanliness at all times • Quickly repair vandalised elements and remove graffiti promptly 	The recommendations of the Crime Prevention Through Environmental Design Report (Architectus 2020) shall be implemented.
Shadowing	The Architectural Design Report (Architectus, 2020) concluded that the additional building mass is located where there will be minimal addition of overshadowing to the surrounding developments and public domain largely due to the building's north/south orientation and the existing shadowing cast by the existing tower form of the building and the significant height of the Harbour Bridge approach.	Noted.