



Reference: HOG11/58763 and HOG11/61683

Your Reference: MP11_0044; MP10_0227; MP10_0025 MOD 1; MP10_0023 MOD 3

Heather Warton
Director Metropolitan and Regional Projects North
NSW Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

Attention: Kate MacDonald; Cameron Sargent

Dear Ms Warton,

RE: Major Projects at Barangaroo South – Commercial Building C3 (MP11_0044) and Commercial Building C5 (MP10_0227) Project Applications; Commercial Building C4 (MP10_0025 MOD 1) and Bulk Excavation and Basement Car Parking (MP10_0023 MOD 3) Modification Applications

Thank you for providing the opportunity to comment on the above Major Projects that the Department of Planning & Infrastructure (DP&I) is currently exhibiting. This submission addresses the four applications – both the Modification and the Project Applications.

As you may be aware, Housing NSW Assets Division (now part of the Department of Finance & Services, Housing & Property Group) has previously submitted comments regarding the Commercial Building C4 Project Application and Bulk Excavation and Carparking Project Application and subsequent Modification Applications. In addition, the H&PG has also commented on the Director General's Environmental Assessment Requirements for Project Applications for Residential Buildings R2 to R11, Commercial Buildings C2 to C6, and the Cultural Building and Public Square.

The NSW Land & Housing Corporation (LHC) owns and manages extensive property in Millers Point including properties located directly adjacent to Barangaroo. Previous submissions provided on proposed works at the Barangaroo site raised concerns over the potential noise, vibration, and air quality impacts during construction and the potential overshadowing and view loss impacts of the proposed buildings.

The Environmental Assessments submitted by the proponent indicate that the overshadowing and view loss impacts of Buildings C3, C5 and C4 on LHC properties, as proposed, would be minimal. It is noted that construction generated noise may exceed noise standards in the residential areas of High Street during some phases of construction, which would have an impact on local residents including social housing tenants located there. Almost half of social housing households in Millers Point are aged 60 years or over and many also have a disability. Therefore many of these residents would be at home during the day when noise levels are highest, which is a concern as these dwellings are not as well insulated against noise compared to surrounding office buildings.

For these reasons it is important that the Noise Mitigation Strategies identified in the Environmental, Construction and Site Management Plan (ECSMP) prepared for each project, if approved, are included in the conditions of project approval to ensure that all Environmental Impact Mitigation Measures are adhered to. It is noted that other approvals for works on the Barangaroo site have been conditioned to require specific noise mitigation treatments to be implemented and/or additional measures such as provision of respite from noisy, vibration intensive activities. Previous approvals have also been conditioned to include the implementation of a Construction Complaints Management System prior to the commencement of construction and the maintenance of the System for the duration of construction. It is requested that similar conditions of approval are applied to the applications for Buildings C3, C5, and the Modification Applications for Building C4 and Bulk Excavation and Basement Carparking.

It is also very important that a dilapidation survey, identified in each ECSMP to be carried out prior to the commencement of works, be included in the conditions of approval for the four applications, if approved, and carried out accordingly. A post construction dilapidation report to determine whether construction works have caused any damage to surrounding LHC properties should also be included as a condition of approval for each of the four applications, if approved. LHC properties surrounding the Barangaroo site have heritage significance and the long term preservation of these properties is of great importance.

A review of the Reflectivity Study submitted by the proponent indicates that reflections off the surface of Buildings C3, C4 and C5 (afternoon sun) in certain months would impact LHC properties located along High Street, Millers Point. The extent of the impact of the reflection from Buildings C3, C4 and C5 would have on LHC properties, especially living areas, is not clearly shown by the Reflectivity Study. It is requested that further detail regarding this issue be provided. It is further requested that an assurance by the proponent be provided that reflections from Buildings C3, C4 and C5 would have minimal impact.

It is essential that all necessary mitigation measures are implemented and the development of the Barangaroo site has minimal impact on the Millers Point residents and properties.

Although the subject Applications do not relate to residential development, the lack of a Housing Strategy for the Barangaroo site is of ongoing concern. Previous submissions have consistently requested that the Barangaroo Housing Strategy be prepared prior to the submission of project applications to ensure an appropriate mix of housing types and affordable housing options are incorporated in the Barangaroo development. Considering that a number of buildings proposed for the site are to be residential, and that DP&I has already accepted a number of preliminary applications for residential buildings at Barangaroo South, the importance of finalising a Housing Strategy is reiterated.

I hope the above comments are of assistance to you. Please contact Sue Brown, Principal Planner on (02) 8753 8529 or Jessica Dominguez, A/ Senior Planner on (02) 8753 8483 in Portfolio Strategy & Urban Planning if you have any queries in relation to this submission.

Yours sincerely,



Christine Hicks,
Manager Portfolio Strategy & Urban Planning