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Cameron Sargent
Team Leader, Key Sites Assessments
NSW Planning and Environment
23-33 Bridge Street,
SYDNEY NSW 2000

Attention: Michele Nettlefold
email: michelle.nettlefold@planning.nsw.gov.au

Dear Michelle,

RE: SSD 6960 – Barangaroo South Stage 1B Basement

We refer to the Department's exhibition of SSD 6960 proposing the construction of the Barangaroo South Stage 1B basement to facilitate three undetermined residential buildings and the undetermined reconfiguration of parklands and the approved southern cove. Temporary works are proposed above ground level comprising turf planting with future building cores, stacks and other basement-related building elements protruding.

The proposed development is presently prohibited within the Open Space Zone and has no planning entitlement for building blocks on which to rely.

The lodgement and exhibition of the SSD application is highly premature and the assessment cannot progress to recommendation or determination until existing state legislation is amended and Modification 8 to the Concept Plan is determined by the Planning Assessment Commission.

The City objects to the application as it would enable the development on land where it is prohibited and enable the development of land reserved for public waterfront open space and in turn facilitate inferior open space provision as contemplated in MOD 8 (which is not approved).

Notwithstanding, the commentary below is provided for the Department's consideration on the design and operation of the development should the zoning and concept plan be amended in favour of the Applicant.

Open Space and Road Design

The proposed "Hickson Park" under MOD 8 and revised zoning is not yet subject to any application for approval for its design. Until a design is proposed, the provision of a basement immediately below places constraints on use and design of the park including limiting tree growth in and around the park, limiting future structures in the park and limiting connection between the park and the periphery. Until a design is proposed, the extent of the proposed basement should be reconfigured so as not to

extend any further than any entitlement for residential building blocks above. A rigorous landscape design for the park should inform the basement design.

The temporary landscape works are not supported in the current form. A design should be presented for the park which may be implemented in stages. Adopting a temporary approach of planting a massive expanse of grass with no trees, planting or social infrastructure ignores the opportunity to implement landscape spaces early to give users more immediate access and landscaping time to establish canopy and rigour.

Given the absence of a park design at this stage, the impact of the car park exhaust stacks and service risers in the west of the park is not capable of assessment. This, more than any other aboveground structures, poses the most significant risk to the outcomes of the development. The park design should be rapidly progressed to ensure the effects of this hard infrastructure are known and acceptable.

The drawings submitted identify a discontinuous footpath on the eastern side of Barangaroo Avenue, just west of the car park, substation and services risers. The footpath should continue by shifting the protruding cores to the east or reconfiguring the road.

Barton Street has no provision for footways in the submitted documentation. The application appears to be delivering only a portion of the road and clarification on the final alignment and width of the street should be provided. As a minimum at this unknown stage, pedestrian access must be provided around the perimeter of the park including Barton Street.

The Applicant should be requested to confirm what access controls, if any, would be necessary around the various basement risers and infrastructure and the Department should assess the environmental impacts of any such access controls.

Given the extent of redesign and coordination that is required the application is considered premature at best.

Transport and Access

Car Parking and Traffic Generation

Parking supply (796 spaces) is based on Sydney Local Environmental Plan 2005 (LEP 2005) rates. The City has continually argued that there is no basis on which to apply LEP 2005 rates which generate higher parking amounts and higher traffic generation.

The continued reliance on LEP 2005 parking rates is of extreme concern. It is demonstrably anomalous and out of date given the projected traffic queuing that will occur on Hickson Road in the context of existing intersections operating at or near capacity. Traffic on the northern approach of the Hickson Road / Sussex Street intersection is forecast to spill back to Hickson Road / Watermans Quay. This is likely to have adverse effects on the entry and exit to the proposed basement, particularly the egress queue. The south bound direction on Sussex Street in the PM peak around the intersection of King and Margaret Street suffers significant existing queuing. The SSD does not identify the traffic impacts the Stage 1 vehicle generation will have on this approach.

The case for constrained parking supply is both reasonable and necessary. The City requests that the Department condition this basement SSD application to ensure car

parking provision for the residential SSD DAs is based on parking rates in Sydney LEP 2012 at the current and relevant time. Parking rates in Sydney LEP 2012 are applied to the land immediately east of the development. Constrained parking supply encourages sustainable and active transport and encourages more energy efficient and sustainable vehicle use such as car sharing schemes. The reliance on outdated car parking rates defies comprehension.

Bicycle Parking

Bicycle parking is not discussed in the submitted TMAP and the architectural plans do not show bike park spaces or end of trip facilities. A "typical basement layout" plan indicates bike parking dispersed through the level. All bike parking and end of trip facilities should be provided at upper basement levels and grouped together. Bike parking rates and end of trip facility provision should be based on the requirements of Sydney DCP 2012.

Loading

The architectural plans show four loading bays are intended to accommodate four Council residential garbage vehicles and five B99-size service vehicles.

A swept path analysis is required to demonstrate that a 9.25m long Council garbage truck can park, manoeuvre while other long vehicles are using the remaining bays and egress in a forward direction.

Basement Access Ramp

The capacity of the access ramp and egress route must demonstrate through queuing analysis that all vehicles waiting to egress are sufficiently accommodated. The indicative 796 spaces, based on RMS Technical Direction TDT 2013/04a, generate 120 vehicle movements in the AM peak. This egress demand is significant and warrants further investigation.

Should you wish to speak with a Council officer about the above, please contact Russell Hand, Senior Planner, on 9246 7321 or at rhand@cityofsydney.nsw.gov.au.

Yours sincerely,



Graham Jahn AM
Director
City Planning | Development | Transport