

30 May 2017

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Ben Lusher
Director, Key Sites Assessment
Department of Planning and Environment
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Dear Ben

Intercontinental Hotel and Transport House Upgrade Concept Plan (SSD 7693) – Response to Submissions

I refer to your correspondence reviewed 7 May 2018 informing the City of Sydney (the City) that the applicant has prepared a Response to Submissions (RTS) regarding the State Significant Development Application SSD 7693 for the Intercontinental Hotel and Transport House Upgrade Concept Plan.

The City has reviewed the RTS and supplementary information and continues to maintain its **objection** to the application in its current form. The City maintains its objections raised previously in letter dated 27 October 2017 (copy of letter attached).

Visual Impacts

The key concerns raised regarding the lack of setbacks proposed and the height of the new addition over Transport House in terms of its impact upon the streetscape, the impact upon Transport House and upon heritage items in the vicinity have not been satisfactorily addressed or substantiated.

Structural Integrity and Building Upgrades – Impact on Transport House

The impact on the interior of Transport House has not been adequately addressed in the RTS. The main justification for the potential extension to Transport House appears to be a statement made by the NSW Heritage Council in a Land & Environment Court proceeding stating that *“the Heritage Council believes Transport House could be modestly enlarged with the addition of two or three levels on the condition that they are of sympathetic design”*. The context and rationale of that statement is not analysed in Urbis RTS. Extensions may take different forms and have varied structural impacts to the existing building. The main concern in relation to the proposed addition of a pool and a ballroom is that the internal spaces, fabric and structure of the highly intact Transport House may be detrimentally affected. Arup’s Structural Engineers Report report does not rule out such impacts and the final solution to strengthening the existing structure remains contingent. We strongly advise that the addition above the Transport House must not be approved unless the necessary structural investigation to the existing building is concluded, the impact of the addition to the existing fabric, features and spaces of the heritage building can be foreseen and the final structural updating solution is agreed upon.

The structural report is inconclusive in terms of the final feasible solutions for seismic retrofitting. No further specific structural investigation works appear to be carried out. However, it is agreed by Arup's Structural Engineers Report and peer review by Mott MacDonald that Transport House must be upgraded to full compliance of AS 1170 Part 4 rather than AS3826 Section B2.1. This means that all the existing structure of Transport House must be updated, which may result in significant loss of heritage significance. The Structural engineer's summary report does not adequately address heritage concerns.

Overshadowing

No electronic CAD modelling has been provided to adequately test the overshadowing impacts of the proposal.

Given that the RTS has failed to adequately assess the concerns previously raised, the City maintains its objection to the proposal.

Should you wish to speak with a Council officer about the above, please contact Vanessa Aziz, Senior Planner on 9246 7758 or at vaziz@cityofsydney.nsw.gov.au

Yours sincerely,

A handwritten signature in black ink, appearing to read 'GJahn', with a stylized flourish at the end.

Graham Jahn AM
Director

City Planning | Development | Transport