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Dear Emily,

SSD 8517 and SSD 8449 – Australian Technology Park, Locomotive Workshop

I refer to your invitation to comment on the above mentioned State Significant Development applications at the Locomotive Workshops at Australian Technology Park, Eveleigh. It is understood that SSD 8517 relates to the adaptive reuse of Bays 1-4a and SSD 8449 relates to the adaptive reuse of Bays 5-13, and Bay 15. Both proposals include internal and external alterations, public domain improvements, and signage. SSD 8517 also includes construction of a travelator between the Locomotive Workshop and Building 2. It is noted that Bay 14 is largely not included in the proposal except for roof upgrade works.

The City has now had the opportunity to review the proposals and is broadly supportive of the proposed development. Given that both SSDs are intrinsically linked, the following comments provided for your consideration relate to development of the Locomotive Workshop as a whole:

Heritage

Pre-lodgement discussions between the applicant, and the City of Sydney and the Office of Environment & Heritage have been ongoing over several months in relation to heritage matters associated with the proposal. To date, the applicant has responded positively with drafts of the proposal amended and refined to minimise and mitigate adverse heritage impacts. The following comments relate only to outstanding heritage issues that require further resolution, design modifications and/or further details/information for consultation and approval with the City.

- *Loading Dock*

Figure A in the Architectural Design Report shows SRVs (small rigid vehicles) and HRVs (heavy rigid vehicles) encroaching into the enclosure for the Davy Furnace. The western wall is solid while the southern wall is a glazed transparent wall to allow visual permeability and connection to the Davy Furnace from the Bay 1 retail area in the south. Notwithstanding the other comments in this letter regarding the loading dock, the possible or potential conflicts between service vehicle requirements and the Davy Furnace enclosure walls must be resolved in favour of maximum 'breathing space' (buffer zone) around the Davy Furnace. The Department are requested to

require the applicant to consult with the City in the detailed design resolution of the loading dock prior to a Construction Certificate being issued.

- *Interpretation Space and Heritage Exhibition*

It is understood that a lift from the ground floor to the interpretation space on the first floor is proposed to Bay 3 to minimise material and heritage impact on Bay 2. New insertions, including the lift, are proposed to be reversible without causing material damage upon removal in the future. The lift is disconnected from the stairs with the lift access being from a BOH (back of house) corridor in Bay 3. Different members from the same group (for example, visitors who have children, the infirm and wheelchair users) potentially will head towards the stairs that are proposed in a more public area. However, those wishing to use the lift will have to separate from the group to access and use the lift located at an out-of-sight BOH corridor. It is recommended that the lift and stairs should be co-located adjacent to each other to provide equitable access options from the ground floor to the interpretation space on the first floor. The co-location of access options must avoid or minimise material and heritage impact on the physical fabric and on the quality of significant spaces. Prior to the issue of a Construction Certificate, the City should be further consulted in the detailed design resolution of access options from the ground floor to the interpretation space on the first floor.

- *External south-eastern annex (corner retail)*

This corner annex is located at a prominent location in the public domain. The 'jewel box' (especially when lit at night) should aid the activation of Locomotive Street and Innovation Plaza as well as provide an orientation point within the site. It is anticipated that retail (café) furniture will have to be stored indoors when the retail is closed at night. The interiors of this annex will be lit with particular focus on the heritage artefact contained within (refer Illumination Strategy and Lighting Report). It is recommended that appropriate and adequate storage areas should be designed and provided for the retail space in the annex at the south-eastern corner, to avoid material and visual clutter both in the day-time and night-time. The adjacent brick annex may be considered for the design and provision of the required storage area. It is recommended that detailed design resolution of the external south-eastern annex (corner retail) be provided to the City for review and comment prior to the issue of a Construction Certificate.

- *Roof plant*

New plant platforms are proposed within the roof valleys between Bays 3/4 and Bays 4/4a to support the proposed supermarket's dedicated plants. These roof plants will require structural supports that will penetrate the existing roofs and will be supported by pairs of new columns. However, design details for these structural supports are lacking in the development application; the information for these structural supports is insufficient to allow thorough assessment of any heritage impact. It is recommended that design details of the roof plants and their structural supports be provided to the City for review and comment prior to the issue of a Construction Certificate.

- *Service Pods*

SSD 8449 (Bays 5-13 & 15) includes the introduction or insertion of 'services and amenities pods' at Bays 5, 7, 8, 10, 11 and 13. However, insufficient design details for these pods have been provided with the application. It is recommended that

design details of the services and amenities pods be provided to the City for review and comment prior to the issue of a Construction Certificate.

- *Tenancy fit-outs*

It is understood that applications will be submitted to the City for the tenancy fit-outs in the future. The Department are encouraged to require the applicant to prepare a tenancy fit-out guide so as to ensure significant fabric and values are conserved and adverse heritage impacts are avoided. It is recommended that a draft version of the tenancy fit out guide be provided to the City for review and comment prior to its finalisation.

- *Archival recording*

Archival recording of the Locomotive Workshop should be carried out prior to demolition, during demolition and on completion of all demolition works. It is recommended that any archival recording submitted to the NSW Heritage Council, should also be provided to the City for its record and to aid its assessments of future development applications. Only electronic versions are to be provided to the City (hard copies are not required).

- *Heritage Management Documents*

Substantial and significant amount of research and analysis (including the provenance of moveable heritage and their current locations) have been carried out in the development of the current SSDAs. Much of this significant work will be lost if relevant heritage management documents were not updated accordingly to reflect the most up-to-date situation. Heritage management documents that will require review, revision and updating should include, at a minimum, the Conservation Management Plan, Moveable Collection Management Plan, and Heritage Asset Management Strategy.

It is recommended that the suite of heritage management documents that will require review, revision and updating should be identified, shortlisted and discussed with the Office of Environment & Heritage. The agreed suite of heritage management documents should then be reviewed, revised and updated within 12 months of the SSDA approvals or prior to the issue of an Occupation Certificate, whichever is earlier.

It is recommended that electronic copies of the updated heritage management documents be provided to the City for its record and to aid its assessments of future development applications. Only electronic versions are to be provided to the City (hard copies are not required).

- *Continuing and long-term curatorial program*

An ongoing and long-term curation of heritage exhibition, interpretation as well as repairs and maintenance of heritage artefacts and equipment, is critical to the success of this site as a heritage destination and as a vibrant repurposed heritage asset. Not all artefacts will be on display at the same time; a rotating curatorial program is required to keep the heritage exhibition and interpretation fresh and to encourage repeat visitations over time.

Without a (permanent part-time or ongoing) curator, the Interpretation Strategy is at risk of dissolution and disintegration over time. A (permanent part-time or ongoing)

curator is critical to ensure continuity and coherent storytelling including of themes, content, signage, branding, landscape/public domain treatment, etc. Without ongoing and consistent curation, stories are at risk of being unthreaded with each retelling.

The Department is recommended to require the applicant to secure adequate ongoing funding for curatorial programs, interpretation as well as repairs and maintenance of moveable heritage be allowed for as part of Mirvac's ongoing operation budget and be reported in Mirvac's Annual Reports.

Urban Design

The route connecting back-of-house facilities with smaller retail spaces and commercial tenancies does not appear separate from public circulation areas. Careful management of waste transfer from the tenancies to the waste storage areas will be required to minimise interface with the public.

Expanded metal mesh is proposed to clad various elements, including the low height retail pods, the wall to the stair providing access to the mezzanine, and the walls of the travelator. While the industrial aesthetic of this material will complement the context of the building, expanded mesh is not considered to be a high quality finish. Due to the method of manufacturing, panels are often left with sharp edges which are considered inappropriate for areas within reach of the general public. Depending on the strand widths and mesh openings it can also be quite an opaque finish, especially from particular angles. It is recommended that the expanded metal mesh is replaced with either a woven mesh or a perforated metal mesh (with folded edges).

The Sustainability Report prepared by Norman Disney Young, dated 20th October 2017, identifies that high performance glazing will be investigated on facades with exposure to solar heat gain. High performance glazing is encouraged, but reliance on tinted glazing to achieve internal amenity is not considered appropriate.

The Department are encouraged to request the following details prior to final assessment, to enable an appropriate review of the proposal:

- Detail of the metal mesh including aperture, finish and colour.
- Details, including the profile and finish of the new metal sheet façade for the plant annexes along the southern facade.
- Details, including finishes of the service pods within the commercial tenancies.
- Details, including profile and fixing system of the polycarbonate roof sheeting.
- Details and proposed location of any high performance glazing proposed. Tinted glazing is not appropriate.

Trees

The Environmental Impact Statements (EIS's) for each SSD state that *'the proposal does not propose works that will impact upon any trees or vegetation'*. However, the EIS for Bays 1-4a later states *'trees may be impacted on Innovation Plaza'*, as a result of the proposed loading dock at the north eastern corner of the site. A review of the proposed loading dock arrangement including vehicle swept paths clearly indicates that some trees within Innovation Plaza are likely to require removal to allow vehicles to access the loading dock. Further, a site visit notes that the existing

tree canopies within Innovation Plaza are extensive and will require pruning nearest the loading dock as a result of the proposal. SSD 8517 (Bays 1-4a) does not adequately address the impacts of the proposal on the existing trees within Innovation Plaza and is misleading in its assumption that no tree impacts will be created. The Department are strongly encouraged to seek clarification from the applicant in this regard prior to determination of the application.

The trees in Innovation Plaza form well established avenue planting with interlocked canopies. The trees provide high amenity and importance to this particular area. Council strongly opposes the removal and excessive pruning of these trees.

It is noted that Council are currently in consultation with the applicant in relation to satisfying Condition B53A (ii) of SSD 7317, which relates to landscape and public domain works for Public Domain Area 2, which includes parts of Innovation Plaza. Those discussions to date have not indicated that any trees will be removed from Innovation Plaza, which is Council's preference. If tree removal is required as part of the current SSD proposal, it should form part of the SSD assessment now so as to properly inform concurrent discussions happening in relation to the site, such as those surrounding Condition B53A (ii).

Transport

The proposal will significantly intensify the use of the site, which includes a large supermarket. If minded to approve the applications, the Department are requested to impose a condition specifically requiring that the 46 visitor bike spaces are installed in accordance with *Australian Standard (AS2890.3 2015)* in the public domain along Locomotive Street for use by customers and visitors and as per the Transport Impact Assessment, prepared by GTA Consultants dated 13 November 2017.

Concerns are raised that the proposal will create a significant intensification of movements by both loading/servicing vehicles and pedestrians. The proposal involves loading vehicles in the loading dock as well as in Locomotive Street potentially posing a significant risk for pedestrian/vehicle conflict. To improve safety, the Department are invited to consider allocating one of the centrally positioned bays in the Locomotive Workshop for vehicle loading whereby goods/waste can be moved with trollies, forklifts, and the like along the northern pathway between the workshop and the rail lines. The width of the bays are sufficient to allow the turning of some vehicles within the bay and/or a turntable could be installed for larger vehicles (subject to heritage impacts).

The Traffic Impact Assessment indicates that the preferred loading access is proposed via Margaret Street (option 2). The large vehicles proposed (8.8m and 12.5m long) cannot be accommodated within the existing road design without requiring changes to the surrounding road network, which are not supported. A solution should rely on the existing conditions of the site and the surrounding road infrastructure. The use of smaller delivery/servicing vehicles means the existing road network could be used without requiring the loss of car parking and other changes, and turn around in the bay designated for loading. The Shared Zone in Marian Street should not be used by delivery/service vehicles and a condition to this effect should be imposed on any consent, and/or the Loading Management Plan should state this requirement with all site tenants subject to compliance with the Loading Management Plan.

As stated in previous correspondence with the applicant following pre-lodgement discussions surrounding servicing and access arrangements to the site, any changes to the existing road network will need to be referred to the Local Pedestrian and Traffic Calming Committee for endorsement. As stated above, Council's position is that changes to the existing road network are not supported and therefore, if the current proposal is to be presented to the LPTCC, the applicant bears the risk that it may not be endorsed.

Notwithstanding the above, if the applications are to be approved, the Department are strongly recommended to impose a condition that requires submission of a comprehensive Loading Management Plan that applies to all of the tenancies within the Workshop and not just relate to the loading dock area. Compliance with the Loading Management Plan is to be specified in tenancy agreements for all tenants within the building and distributed to those tenants at least annually and with any change of tenancy. The Plan is to be submitted to Council's satisfaction and not to the satisfaction of any Private Certifying Authority.

Mechanical Ventilation and Noise

The Acoustic Assessment submitted confirms that building services equipment such as mechanical ventilation has not yet been selected and therefore no details have been provided with the applications. The Department should satisfy itself as to the impacts, if any, of mechanical systems on the spatial quality of the building. While there may be an intention by the applicant to submit this detail with future fit-out DAs, depending on the specific requirements of tenancies, retrofitting mechanical systems may prove problematic at a later stage due to the heritage significance of the building. In addition, further detailed acoustic assessment will be required during the design development with regard to building services plant and machinery noise control and management of retail activation areas.

The Department are strongly encouraged to ensure this detail forms part of any base consent for the Locomotive Workshop.

It is noted that suitable and sufficient ventilation should be provided and maintained to all areas in order to comply with the Building Code of Australia and AS1668.1 and 2 – 2012- The Use of Ventilation and Air-Conditioning in Buildings - Mechanical Ventilation in Buildings.

Land Contamination and Hazardous Materials

The land should be remediated and validated in accordance with the recommendations of the Remedial Action Plan, prepared by JBS&G, dated 15 June 2016, reference 51142/104280 (Revision 0) and should be approved by a NSW Accredited Site Auditor as suitable for all the proposed uses.

The remediation strategy is likely to include capping and contain residual contaminants and prevention of vapour ingress from the sub floor, which will require a Long Term Environmental Management Plan for ongoing management that will incorporate the requirements of existing Environmental Management Plans, as relevant to the site. The Long Term Environmental Management Plans should be reviewed and approved by a NSW Accredited Site Auditor as part of any consent.

If the Department are minded to approve the applications, consents should also include conditions to deal with unexpected finds including underground service tanks (UST's) and other unexpected contaminants and classification and disposal of waste.

Works involving penetration of the existing ground slab should be overseen by an occupational hygienist or environmental consultant. The representative air monitoring undertaken is to confirm that the construction works and nearby persons are not subject to adverse vapour related health risks, as recommended within the Hazardous Materials Survey, prepared by JBS&G, dated 9 August 2017, reference 51142/110236 (Revision A).

Should the application be approved, the Department are recommended to include conditions to require the developers to engage licensed asbestos contractors to safely remove and properly dispose of all asbestos containing materials that are to be removed as part of the proposal.

Flooding

The site is affected by 1% AEP event particularly at the back of property of Bay 01 to 04A (SSD 8517). To comply with the City of Sydney Interim Floodplain Management Policy, the ground floor levels for the development across both SSDs are to be set at a minimum of 300mm above the adjacent invert of gutter level.

Public Domain

Concerns are raised about the operation and management of the loading zone including access in and out of the site, which should minimise impacts on pedestrian safety through the site and in particular, areas such as Innovation Plaza, where large pedestrian traffic is expected and currently forms part of a pedestrian link through to Redfern Station.

The existing brick paving within Innovation Plaza will potentially be affected by the frequency and size of delivery trucks, which has not been designed for the proposed intensity and type of trafficking and turning.

The delivery of public domain works in accordance with the City's policies, standards and specifications for future dedication can be addressed through the application of the public domain plan, alignment levels, stormwater conditions and other associated conditions, as per 'Attachment A'.

If the Department are minded to approve the proposed travelator under Locomotive Street (subject to future dedication to Council), they are requested to impose a condition requiring the future dedication of the area to be '*in stratum*', as the City are not prepared to take on liability for its ongoing maintenance, which is considered to be too costly and onerous.

Signage

The signage zones generally appear to be appropriately scaled and the strategy appears well considered. However, the zones proposed to the external structures at Bays 4 and 4A appear to cover a considerable surface area that will dominate the scale of these built structures. The City questions the necessity for the signage in that location given that the external structures at Bays 4 and 4A will not have a direct connection with particular tenancies and therefore should be deleted from the proposal.


It is noted that the current redevelopment includes the renumbering of the bays to their original sequence (i.e. Bays 1–4, Bay 4a, and Bays 5–15) with concomitant

removal of existing bay numbering signs (non-original). However, the SSDAs do not include signage proposals for the renumbering of the bays.

It is recommended that the signage proposals should be rationalised, integrated and consistent with the Interpretation Strategy (November 2016) prepared by Curio Projects, and approved by the NSW Heritage Division in February 2017. Further, a signage development application for the renumbering of the bays is required to be submitted to the City of Sydney council.

Should you wish to speak with a Council officer about the above, please contact Maria O'Donnell, Specialist Planner, on 9265 9834 or at modonnell@cityofsydney.nsw.gov.au

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Andrew J. Thomas'.

Andrew Thomas
Acting Director
City Planning | Development | Transport