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File No: MP 08_0098 MOD 13

David McNamara
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Dear David,

The Star (MP08_0098 MOD 13) – 20-80 Pyrmont Street, Pyrmont – Response to Submissions

Thank you for your correspondence dated 3 December 2018 which invites the City of Sydney ("the City") to review the Response to Submissions ("RTS") in respect of MP08_0098 MOD 13 and to provide final comments.

It is noted that the proposed scheme is generally the same as that originally submitted and that further information has been included to clarify the proposed modification.

The City of Sydney (the City) has reviewed the RTS and maintains its **objection** as the issues raised in the City's letter dated 9 October 2018 remain unaddressed. The following additional comments are provided for your consideration:

Public Domain

The proposal now only allows for asphalt infill along Pyrmont Street apart from the driveway entrance which will be finished in granite. This represents a downgrade from public domain discussions previously held and is an unacceptable treatment of the public domain when substantial redevelopment is taking place. The City's position is that the resurfacing of the area between the driveway and Jones Bay Road to remove surface defects is required.

The additional driveway access off Pyrmont Street results in safety concerns for pedestrians as it has been designed such that insufficient width is available for pedestrians between the entrance and the exit, thereby forcing pedestrians to hurry across the driveway to avoid conflicts with vehicles.

The low walls around the outdoor seating area located at the corner of Jones Bay Road constricts the width of a level footway and wheelchair access. The low walls will need to be modified or relocated to remove this unacceptable conflict.

A new planter at the southern end of the Pirrama Road frontage, adjacent to the car park entrance, is proposed with this submission. The planter bed spans private and public land raising questions of maintenance and liability. The planter should be reconsidered or reduced in size (refer Dwg: L400 B). Any proposed use of public land will require separate approval of the City.

The raised walls near the outdoor seating area in Jones Bay Road should be relocated away from the pedestrian ramp to allow a minimum 1.2m width level access.

Should the Department of Planning and Environment be of the mind to approve the application, it is recommended that the public domain upgrade works be extended to include a continuous upgrade between the vehicle driveway mid-block along Pyrmont Road to Jones Bay Road and along the frontages of Pirrama Road, including provision of upgraded public domain lighting.

Stormwater

The application makes reference to a stormwater plan. This stormwater plan is not available for review and thus it is not possible to validate the Hydraulic Infrastructure Management Plan (prepared by UMOW LAI dated 27.03.17) statement that *“The existing site stormwater infrastructure has adequate capacity to drain the proposed new build areas”*. On this basis, the City is unable to provide any comments on the proposed stormwater works to address the local flooding and overland flow issues. Nevertheless, the Department should ensure that the stormwater plan:

- clearly identifies Sydney's Water infrastructure/pipes and Council's infrastructure/pipes;
- includes drainage/hydraulic calculations to demonstrate that there is no impact on the downstream and upstream drainage;
- achieves a stormwater quality target as per City of Sydney DCP 2012, Part 3.7.3 Stormwater Quality. In this regard, it should be noted that Council has adopted the MUSIC Link – ‘Model for Urban Stormwater Improvement Conceptualisation’. It is recommended that the applicant's consultant use this model in submitting any further reports for the City's consideration.
- address local flooding and overland flow issues in and around the site.

Note: the landscape plans indicates that there is a proposed raised pedestrian crossing on Jones Bay road. Typical details of the proposed raised pedestrian crossing should be provided for review and approval. The applicant's engineer should also confirm whether the proposed raised pedestrian crossing will block the flow of stormwater water along Jones Bay road and that no adverse impact will be caused to adjoining sites.

Flooding

The RTS proposes the inclusion of flood gates at the Edward Street and Pyrmont Street driveway entrances.

Similar to the above comments regarding Stormwater, a copy of the “TTW Flood Impact Assessment (January 2018)”, including all the assumption and parameters/limitation of this report, is not available for review. On this basis, the City is unable to properly review and provide any comments on the proposed stormwater works to address the local flooding and overland flow issues.

Nevertheless, it is expected that the revised flood impact assessment addendum prepared by TTW dated 07.11.2018 should demonstrate that the proposed and existing FFL comply with Council's Interim Floodplain Management Policy, and include a plan showing the FFL, existing kerb and 1%AEP, and PMF. In addition, the applicant's engineer should also confirm whether the proposed raised pedestrian crossing will block the flow of stormwater water along Jones Bay road and that no adverse impact will be caused to adjoining sites.

The City advises that both Stormwater and Flooding issues need to be addressed prior to any favourable determination of this application. It is not appropriate to address these at a later stage via conditions of consent.

Landscaping Drawing coordination and soil depths

The applicant has confirmed minimum soil depths will be in accordance with the Landscape Code Volume 2 and the ADG as noted in table below, which is supported. However, several typical planter sections for planting on podium shown on Dwgs L900-902 [A], do not reflect the minimum depths which is not supported.

Location	Soil depth
Turf	200 mm
Ground covers	300 – 450 mm
Shrubs	500 – 600 mm
Small trees (6-8m high)	800 mm
Medium trees (8-12m high)	1000 mm
Large trees (12-18m high)	1200 – 1500 mm

It is recommended that the landscape design should ensure that minimum soil depths (or higher) are achieved to ensure a high quality landscape outcome. It is noted that the minimum soil depths are in addition to drainage and mulch layers.

Green seam (Tower Levels 21-59)

The applicant has consulted Junglefy regarding the green wall detail design. Junglefy have provided advice on the design and ongoing maintenance of the green seam and green wall in the port cochere only. It appears that Junglefy holds reservations about the success of plants from comments such as *“Drawings and comments suggest there will be airflow behind glazing, as it sails past as a screen, rather than enclosing the space. However If these concerns could be alleviated via heat modelling or assurances that radiant and reflective heat would not exceed acceptable levels, then the following species are recommended for use on a western facade.”*

The Western Seam planter details (FJMT Façade details) provide more information on the proposed green wall and shows that planter boxes are located on every level with wires growing climbers and cascading species. The facade details include an integrated exhaust / ventilation grille which will vent onto the plants and is likely to impact on the plant health and success.

Complex access arrangements are required for green seam planter box maintenance that requires a multi-pronged approach with a combination of BMU, rope access and walkways at landings every 3 floors. Junglefy should provide information on the indicative maintenance strategy to ensure the success of the proposal.

Removal of the volume of green waste for the proposal will be complex and will require a composting or bio-digester integrated into the basement for disposal and recycling of green waste. This area is not shown on the architect's basement plans and should be allowed for in the design.

In addition, the following concerns are raised:

- What are the acceptable radiant and reflective heat levels for healthy plant growth on a green wall?

- Has the applicant completed heat modelling or provided Junglery (and the City) assurance that the green seam is feasible?
- Further design and refinement of the design is required to ensure minimal impact on green wall plants.
- Ensure design allows for composting or bio-digester integrated into the basement design

Green Wall – Hotel Porte Cochere

The porte cochere green wall is located in full shade and Junglery advise that a 'Breathing wall' proprietary system will work in the location only on the proviso that LED grow lighting is installed to ensure healthy plant growth. The plant species in planters elsewhere in the porte cochere will also be in shade however the plant species that have been selected for this area require full sun to thrive.

Given the above, the proponent should clarify if LED grow lighting will be installed as part of the design and/or substitute plant species to ensure a high quality landscape outcome.

Landscape maintenance of works on podium and rooftop

It is understood from the RTS that Junglery will be required for the maintenance of green walls only and will not be responsible for the maintenance of planting on podium and green roofs.

The landscape maintenance strategy submitted is generic, relates to the public domain and does not provide an adequate level of detail for planting on podium and green roofs. Furthermore, there are a number of plantings on the podium located in inaccessible parts of the building and at the edges of the facade. The proposal does not outline how these areas will be safely accessed and maintained.

It is recommended that the proponent provide a maintenance strategy for all landscaping and outline who will be responsible for maintenance.

SELS forecourt

The DPE noted the concern raised by the City about the level of detail provided for the public domain works and the SELS forecourt on the corner of Jones Bay Road / Pyrmont Road. The applicant has provided confirmation of levels, layout and sections which illustrate a pram ramp junction at a low wall and the creation of potential trip hazards with low walls. The design is not acceptable and is not supported.

It is recommended that the proponent provide a revised design to ensure a DDA compliant scheme in the public and private domain with adequate footpath space, the removal of all trip hazards and adequate seating walls heights (if required).

Reduction in green roof area (approved under MOD 14)

The DPE requested confirmation of the reduction in green roof area between the approved (MOD14) and proposed (MOD 13).

The applicant confirmed that Mod 14 non-accessible level 5 green roof is proposed to be replaced with the accessible level 5 terrace which integrates external dining areas, leisure, and event and circulation spaces within a garden setting. The resulting reduction of green roof area is 4,311m² (Mod 14) to 794m² for Mod 13.

The proposed green roof reduction is an overall reduction of 82% of potential habitat and biodiversity within the City. This extent of reduction is not supported.

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 'Louise Kerr', with a long horizontal flourish extending to the right.

Louise Kerr
Acting Director
City Planning | Development | Transport