



1st April 2016

Ben Lusher
Director
Key Sites Assessments
NSW Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Mr Lusher

RE: SUBMISSIONS FOR MP10_0048 MOD 8 – AMEND TO HCT DEMOLITION METHODOLOGY

We refer to your letter dated 22nd March 2016 requesting a response to matters raised by the Department of Planning and Environment (DPE) and to submissions received from the City of Sydney (CoS), Safework NSW, Office of Heritage & Environment (OEH), the Environmental Protection Authority (EPA) and Transport for NSW (TfNSW) in relation to the proposed modification to the approved Harbour Control Tower demolition methodology (MP10_0048 MOD 8).

We have reviewed the matters raised by DPE and the submissions provided and respond as follows:

- 1. City of Sydney (CoS) – Letter dated 16 March 2016 (Our Ref: 2016/137675, File No: R/2010R580RG, Your Ref: MP_10_0048 MOD 8)**

The above letter identifies that “A Footpath Damage Bank Guarantee is required for the Tower demolition works”.

Response

A Bank Guarantee will be lodged with the City of Sydney once the proposed modification has been determined (refer to [Attachment No 1 - email from CoS re footpath bank guarantee](#)) and prior to the commencement of works.

- 2. Safework NSW – Letter dated 14th March 2016 (Our Ref: Modifications to Harbour Control Tower Demolition)**

In their letter Safework NSW advised there was insufficient information in the Demolition Work Plan to ascertain whether the demolition of the HCT can be undertaken safely.

Response

A site meeting was held with Steve Nikolovski (Safework NSW State Inspector – Asbestos and Demolition) and Liberty Industrial on Wednesday 16th March 2016 to discuss the project and the comments provided by Safework NSW on the documentation submitted for the project.

Liberty Industrial has provided a revised (Rev 09) Demolition Work Plan which addresses all the comments made by Safework NSW. This was emailed directly to Safework NSW (Steven.Nikolovski@safework.nsw.gov.au) on 24/3/16 (refer to [Attachment No 2 – Demolition Work Plan_HCT_Rev 09](#)).

The table below details the changes that were made from the previous submitted revision:

Section	Changes
4.1	Hoarding / Site layout at Merriman St and Cutaway levels
6	Provision to removal all ACM prior to demolition
7	General Methodology
8.5	Clarify site access
11.1.2	Demolition Chute
11.1.3	Crane position updated
11.1.4	Glass removal and half-truss sections
11.1.6	Operator location, beam demolition method
11.1.8	Blast Plan provision
11.4	XL Platform details
Appendix B	Organisational Chart

3. Office of Environment & Heritage (OEH) – Email from Nina Pollock dated 14th March 2016

This email identifies that “given that removal of the control tower has been approved, further modifications regarding details of its removal are not of interest to the Heritage Division” and “therefore will not provide a formal submission for this modification”.

Response

No action required.

4. Environmental Protection Authority (EPA) – no submission provided but requested that additional information be provided to address the following matters:

- Air Quality Management Plan - the EPA has requested that the final AQMP be provide for review before final comments will be provided to the Department.
- Water Management Plan - the EPA has advised that WMP was not provided for assessment. The EPA has concerns in relation to the adequacy of stormwater and wastewater management during the Harbour Control Tower demolition, and has advised that it will need to review the WMP before providing comments to Department on the proposal.

Response

Liberty Industrial has prepared the final Air Quality Management Plan and a Waste Management Plan. These were emailed directly to the EPA on 22/3/16 (refer to [Attachment No 3 – Air Quality Management Plan_HCT_Rev B](#) and [Attachment No 4 – Waste Management Plan_HCT_Rev 03](#)).

The tables below detail the changes that were made to the Waste Management Plan from the previous submitted revision of this plan:

Section	Changes
5	Disposal facilities updated.
5.1	Identified recycling target as >95%.
7.5.3	Noted consent condition D4 – covering of all loads.
7.5.4	Waste traceability to be reported in Monthly report.
7.6	Waste water management updated according to advice from BDA regarding drainage.

5. Matters Raised by DPE in Appendix A to letter dated 22nd March 2016

In its letter dated 22 March 2016, DPE raised a number of matters in relation to the Demolition Work Plan and Deconstruction Noise and Vibration Assessment.

Response

Liberty Industrial have provided a revised Demolition Work Plan (Rev 09) which addresses all the comments made by DPE with respect to the Demolition Work Plan and the Deconstruction Noise and Vibration Assessment, with the exception of including a reference to the Water Management Plan in Section 8.3. The Water Management Plan does not form part of the project documentation. Water discharged from the site is addressed in the Waste Management Plan (refer to [Attachment No 4 – Waste Management Plan_HCT_Rev 03](#)) and is in line with discussions Liberty Industrial had with the EPA.

Liberty Industrial has revised the Deconstruction Noise and Vibration Assessment Report (refer to [Attachment No 5 - Deconstruction Noise and Vibration Assessment Report_HCT_Rev 02](#)) to address all the comments made by DPE. The changes made to this plan are as follows:

Report	Section	Changes
Noise and Vibration Assessment	5	Reference to modification 4 approval in addition to main works original approval.
Noise and Vibration Management Plan	5.2	Amended layout
	6	Separated from section 5 into a new section.
	6.3	Detailed outline of noise and vibration monitoring
	7	Separated from section 5 and outlined detail approach to community consultation, dealing with complaints, reporting requirements and contingency plans

6. Transport for NSW (TfNSW) – letter from Marg Prendergast dated 24/3/16

Proposed Changes to Condition B40(b)

Issue

The applicant proposes the following changes to Condition B40 (b) - Construction and Traffic Management and Approvals — Harbour Control Tower

"Prior to the commencement of works for the demolition of the Harbour Control Tower, the proponent is to comply with the following requirements:"

b. Prepare a Traffic Management Plan in consultation with the City of Sydney Council, ~~the RMS and local residents who will be affected by the road closure in Merriman Street and Bettington Street~~. The Plan is to address traffic management and mitigation measures for the full term of the construction period, including provision of a convenient and viable solution for the loss of on-street resident parking."

Recommendation

TfNSW does not support the removal of RMS as the construction traffic accessing site is expected to use classified roads and requests that the Traffic Management Plan be approved by the CBD Coordination Office within TfNSW. TfNSW requests that the Condition B40 (b) be modified as follows:

"Prior to the commencement of works for the demolition of the Harbour Control Tower, the proponent is to comply with the following requirements:"

b) Prepare a Traffic Management Plan in consultation with the City of Sydney Council, ~~the RMS Roads and Maritime Services~~ and local residents who will be affected by the road closure in Merriman Street and Bettington Street. The Plan is to address traffic management and mitigation measures for the full term of the construction period, including provision of a convenient and viable solution for the loss of on-street resident parking. ~~The applicant shall submit a copy of the final plan to the Coordinator General, CBD Coordination Office for approval.~~

Liberty's proposed methodology has the following vehicle movements to and from the site:

- Trucks accessing Merriman Street during construction and alterations of the XL Platform
- Trucks accessing the Cutaway via the existing driveway off Towns Place via Hickson Road for loading out the demolition debris during the structural demolition of the Tower, and
- Construction workers personal vehicles – maximum of six personnel at any stage of the works

The XL Platform works is scheduled to be undertaken as follows:

- Crossover construction for 16t City Crane access to BDA land – 2 days (currently scheduled for late April 2016)
- Erection part 1 – 7 days (currently scheduled for early May 2016)
- Erection part 2 – 18 days (currently scheduled for mid May to early June 2016)
- Alteration – 6 days (currently scheduled for late September 2016)
- Dismantle – 4 days (currently scheduled early October 2016)

During the above times, either a partial or full road closure of Merriman Street will be required to accommodate trucks and crane usage. Merriman Street falls under the jurisdiction of the City of Sydney Council, which will require the following necessary approval and permits as advised by the City of Sydney Construction Regulation Unit:

1) 55t Mobile Crane operating from Merriman St:

- Temporary Full Road Closure Application

2) 16t City Crane operating from BDA land:

Temporary Driveway (for access from Merriman St onto BDA land)

- Road Opening Permit Application
- Temporary Works Application

16t City Crane working from BDA land and unloading trucks from Merriman St

- Hoisting Approval Application

For trucks accessing the Cutaway, during the peak structural demolition period from July to September 2016 there will only be 1 to 2 truck movements per day (refer to section 6.5 of [Attachment No 6 – Traffic Management Plan_HCT_Rev 02](#)) and only 3 truck movements per week outside this period. These minimal traffic movements create a negligible traffic impact on Hickson Road and Towns Place.

We highlight that all consultation with local residents is undertaken by BDA via monthly community consultation meetings. As such, these forums will be used to address impacts on Merriman Street and any arrangements for alternative parking for residents when required.

Given the negligible traffic impacts on both Merriman Street and Hickson Road/Towns Place/Dalgety Road, we do not believe consultation with Roads and Maritime Services is required for the Traffic Management Plan, nor obtaining Coordinator General, CBD Coordination Office approval.

Construction Traffic Management Plan (CTMP)

Issue

Harbour Control Tower Demolition Works — Traffic Management Plan prepared by Liberty Industrial Pty Ltd has not included detailed information in relation to traffic, pedestrians and cyclists impact and the management of these impacts.

Recommendation

TfNSW requests that the Traffic Management Plan be updated in consultation with the CBD Coordination Office within TfNSW and Roads and Maritime Services. The CTMP needs to specify, but not limited to, the following:

- Haulage route for vehicles accessing Merriman Street;
- Location of the loading dock in the cut-away;
- Estimated number and type of construction vehicle movements for all stages of work, including construction workers accessing the site, during peak periods and throughout the day;
- Swept path analysis for all construction vehicles into and out of Merriman Street and the cut-away;
- Proposed construction hours;
- Detailed assessment of the safety of Headland Park users during the demolition of the Harbour Control Tower;
- Construction program for each stage of the work;
- Details of the red light/ green light system that is proposed as a pedestrian safety measure for the cut-away exit for construction vehicles;
- Details of proposed measures for local residents accessing Merriman Street during the closure of Merriman Street;
- Any potential impacts to general traffic, cyclists and pedestrians within the vicinity of the site from construction vehicles during the construction of the proposed works in particular Headland Park users; and
- Measures proposed to mitigate any associated general traffic, pedestrian and cyclist impacts should be clearly identified and included in the CTMP.

As discussed above, there is only 1 to 2 truck movements per day in the surrounding roads to the site during both the XL Platform erection and the structural demolition and hence negligible impact on these roads.

As requested by TfNSW, Liberty Industrial has updated their Traffic Management (refer to [Attachment No 6 – Traffic Management Plan_HCT_Rev 02](#)). The Traffic Management Plan has been revised to address TfNSW's specific requests as detailed below:

- [Haulage route for vehicles accessing Merriman Street](#) – refer to Section 6.3 of Liberty Industrial's revised Traffic Management Plan Rev 02
- [Location of the loading dock in the Cutaway](#) – refer to Section 6.3 and Appendix A – Traffic Routes of Liberty Industrial's revised Traffic Management Plan Rev 02
- [Estimated number and type of construction vehicle movements for all stages of work, including construction workers accessing the site, during peak periods and](#)

[throughout the day](#) – refer to Section 6.5 of Liberty Industrial’s revised Traffic Management Plan Rev 02

- [Swept path analysis for all construction vehicles into and out of Merriman Street and the Cutaway](#) – refer to Section 6.4.2 of Liberty Industrial’s revised Traffic Management Plan Rev 02 for the sweep path analysis for vehicles accessing Merriman St.
- The Cutaway has a designated loading dock that has been designed to receive deliveries from Semi Trailers which is currently active and in service for BDA when functions are held within the Cutaway Cultural Space. As such, no sweep path analysis is required for vehicles entering this loading dock (refer to Section 6.4.1 of Liberty Industrial’s revised Traffic Management Plan Rev 02).
- [Proposed construction hours](#) – refer to Section 6.2 of Liberty Industrial’s revised Traffic Management Plan Rev 02
- [Detailed assessment of the safety of Headland Park users during the demolition of the Harbour Control Tower](#) – The assessment of the demolition method has been review and addressed by Safework NSW as part of the Modification application with their concerns addressed.
- [Construction program for each stage of the work](#) – refer to [Attachment No 7 - Demolition Program_HCT_Rev 01](#).
- [Details of the red light/ green light system that is proposed as a pedestrian safety measure for the cut-away exit for construction vehicles](#) – The red light / green light system is within the BDA operation and is used to control traffic within the Cutaway loading dock facility (refer to Section 6.3.1 of Liberty Industrial’s revised Traffic Management Plan Rev 02)
- [Details of proposed measures for local residents accessing Merriman Street during the closure of Merriman Street](#) – refer to Section 6.5.2 of Liberty Industrial’s revised Traffic Management Plan Rev 02
- [Any potential impacts to general traffic, cyclists and pedestrians within the vicinity of the site from construction vehicles during the construction of the proposed works in particular Headland Park users](#) – The impact will be negligible as the additional vehicle movements is only expected to be 1 to 2 trucks per day at the peak of the project.
- [Measures proposed to mitigate any associated general traffic, pedestrian and cyclist impacts should be clearly identified and included in the CTMP](#) – As there is negligible impact due to only 1 to 2 truck movements per day, no measures are required.

Road Occupancy Licence

Issue

The proposed construction activities include partial and full closure of Merriman Street. It is not clear from the CTMP that a road occupancy licence will be obtained for these closures.

Recommendation

TfNSW advises that a Road Occupancy Licence (ROL) must be obtained from the Transport Management Centre (TMC) for any activity likely to impact on the operational efficiency of the road network. The ROL allows the applicant to use a specified road space at approved times, provided certain conditions are met.

Proponents must allow a minimum of 10 working days for processing from date of receipt. Traffic Control Plans are to accompany each ROL application.

In preparation for the works, Liberty Industrial submitted a Temporary Full Road Closure Application to the City of Sydney Council on the 9/2/16 to have a full road closure in Merriman St over the period 21/4/16 to 5/5/16.

This application went to the Local Pedestrian Cycling and Traffic Calming Committee on the 16/3/16 who endorsed the temporary road closure on Merriman St and their consideration was that an ROL is not required for this closure as it does not affect the road network (refer to [Attachment No 8 - CoS approval letter of Merriman St Full Road Closure](#) and [Attachment No 9 – CoS Traffic Committee Meeting Item 11](#)).

Based on the above, a Road Occupancy Licence is not required for Merriman St closures.

7. HCT Interpretation Plan

As a result of the complexities associated with preparing the Interpretation Plan, the required stakeholder consultation and BDA internal approval processes, additional time is required to finalise the Interpretation Plan. As such, the Authority proposes to modify Condition B41 with respect to the timing of submission of the Interpretation Plan:

B41 INTERPRETATION PLAN – HARBOUR CONTROL TOWER

*Prior to the commencement of demolition works, an Interpretation Plan is to be developed for the Harbour Control Tower site in accordance with the implementation and management guidelines established in Chapter 6 of the Interpretation Strategy prepared by Rintoul Associates dated November 2013. The Interpretation Plan is to be submitted and approved by the Secretary for approval prior to the commencement of ~~the demolition works~~ **permanent works at ground or below ground levels**.*

The Interpretation Plan is to incorporate the interpretation themes and key stories identified in Sections 4.2 and 4.3 of the Interpretation Strategy including to comprehensively address:

- *The Story of the Port of Sydney;*
- *The historic changes in the landform of Millers Point;*
- *The historic changes in the built form of Millers Point; and*
- *The associated labour, workers, housing and social movements which were integrally linked to the maritime activities at Millers Point.*

The Interpretation Plan is to include the time-lapse recording of the demolition of the HCT required by Condition B34B.

Your consideration of the above reply to the response to submission is appreciated. Should you have any queries or require any further information, please contact me on 02 9255 1726 or at peter.Funder@barangaroo.nsw.gov.au.

Yours sincerely



Peter Funder

Project Director, Barangaroo Reserve and Central

List of Attachments

Attachments
Attachment No 1 - email from CoS re footpath bank guarantee
Attachment No 2 – Demolition Work Plan_HCT_Rev 09
Attachment No 3 – Air Quality Management Plan_HCT_Rev B
Attachment No 4 – Waste Management Plan_HCT_Rev 03
Attachment No 5 - Deconstruction Noise and Vibration Assessment Report_HCT_Rev 02
Attachment No 6 – Traffic Management Plan_HCT_Rev 02
Attachment No 7 - Demolition Program_HCT_Rev 01
Attachment No 8 - CoS approval letter of Merriman St Full Road Closure
Attachment No 9 – CoS Traffic Committee Meeting Item 11