



Our ref: DOC20/411214

James Groundwater  
Senior Environmental Assessment Officer  
Key Sites Assessments  
Planning and Assessment  
Department of Planning, Industry and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

By email: James Groundwater [James.Groundwater@planning.nsw.gov.au](mailto:James.Groundwater@planning.nsw.gov.au)

Dear Mr Groundwater,

**Notice of Exhibition of Pitt Street South Over Station Development Stage 2 (SSD 10376)  
- Comments on Environmental Impact Statement**

---

Thank you for your referral inviting the Heritage Council of NSW to provide comment and recommended conditions of approval for SSD 10376 - Pitt Street South Over Station Development Stage 2 (the proposal).

As delegate of the Heritage Council of NSW, we provide the following comments on the proposal.

**Hyde Park**

The Heritage Council has previously provided advice on SSD 8876 - Stage 1 of the proposal (concept development) in relation to the minimisation of overshadowing impacts to Hyde Park (which is listed on the State Heritage Register).

The Heritage Council notes that Stage 2 of the proposal's overshadowing impacts on Hyde Park is less than that produced by the approved building envelope (Appendix E.2 Shadow Analysis Report). Nevertheless, there will be an increase of overshadowing of Hyde Park at certain times of the year. While we acknowledge the additional shadowing is outside of the intended period of protection (10:00am to 2:00pm) established for the sun access plane controls, we reiterate our strong support for compliance with the *Sydney Local Environmental Plan 2012* Sun Access Plane Controls in your assessment of the proposal.

**Construction vibration**

The SEARs required the heritage impact statement (HIS) to assess the impact of the proposal on the State Heritage-listed former Sydney Water Head Office Building (SHR 016545) which is located directly opposite the subject site on Pitt Street. The HIS notes that *"the physical impacts above-ground physical connections or underground excavation and construction must be considered"*; the HIS refers to the Acoustic Report (prepared by Renzo Tonin & Associates) to manage the impact of construction vibration on heritage items and other buildings in the vicinity.

**Sydney Water Head Office Building**

The HIS concludes that the Sydney Water Board's *"primary facade fronts onto Pitt Street and its secondary facade onto Wilmot Street. No significant views from the public realm to either*

Heritage NSW

Locked Bag 5020 Parramatta NSW 2124 ■ Level 6, 10 Valentine Ave Parramatta NSW 2150  
P: 02 9873 8500 ■ E: [heritagemailbox@environment.nsw.gov.au](mailto:heritagemailbox@environment.nsw.gov.au)

*facade will be obstructed by the proposed building. While some existing partial views from Castlereagh Street over the top of the Edinburgh Castle Hotel to the Pitt Street facade of the SWB will be obstructed, such views only became available when the buildings on the subject site were demolished...such recently available views are not considered to have heritage significance."*

We acknowledge the well-considered podium façade design to respond to the scale and character of the surrounding context. However, the EIS provided only limited information on how the western façade of the Pitt Street podium responds to the Institutional Inter-War Functionalist façade of the Sydney Water Board Building opposite, and to the civic character and rhythm of both sides of Pitt Street.

## RECOMMENDED CONDITIONS OF APPROVAL

If SSD 10376 were to be approved, the following conditions are recommended.

- a) **Archival recording** be carried out in accordance with *Photographic Recording of Heritage Items Using Film or Digital Capture* guideline (Heritage Office, Department of Planning, 2006) for the development site and surrounds. The recording should include key views on Pitt Street, to show the development site's relationship to the former Sydney Water Head Office Building located opposite.  
Where appropriate, we would recommend the recording of the precinct before, during and after any major changes and use this record in the site's interpretation. Within 12 months of completing the archival recording, the Proponent should be required to submit a digital copy of the archival recording to Heritage NSW and City of Sydney.
- b) **Heritage NSW and/or Heritage Council (or its Delegate) be consulted:**
  - i. at key stages of the detailed design development of the **Pitt Street podium**; and
  - ii. in the finalisation, adoption and implementation of the **Heritage Interpretation Plan**, to ensure interpretation outcomes are generally accordant with the Sydney Metro Pitt Street North OSD as well as with any interpretation proposal for archaeological remains identified at the subject site.
- c) The next stages of the project to demonstrate that the following **noise and vibration** requirements can be met:
  - i. vibration from construction activities does not exceed the vibration limits set out in the British Standard BS 7385-2:1993 *Evaluation and measurement for vibration in buildings. Guide to damage levels from ground borne vibration*.
  - ii. vibration testing has been conducted before and during vibration generating activities that have the potential to impact on heritage items to identify minimum working distances to prevent structural and cosmetic damage. In the event that the vibration testing and monitoring shows that the preferred values for vibration are likely to be exceeded, the Proponent must review the construction methodology and, if necessary, propose additional mitigation measures.
  - iii. advice of a heritage specialist on methods and locations for installing equipment used for vibration, movement and noise monitoring of heritage-listed structures.
- d) The next stages of the project be accompanied by a **Noise and Vibration Impact Assessment** that identifies and provides a quantitative assessment of the main noise generating sources and activities during operation including consideration of noise and vibration impacts associated with development above a train station. Details to be included outlining any mitigation measures necessary to ensure the amenity of future sensitive land uses on the neighbouring sites are protected during the operation of the development.

Heritage NSW

Locked Bag 5020 Parramatta NSW 2124 ■ Level 6, 10 Valentine Ave Parramatta NSW 2150  
P: 02 9873 8500 ■ E: [heritagemailbox@environment.nsw.gov.au](mailto:heritagemailbox@environment.nsw.gov.au)

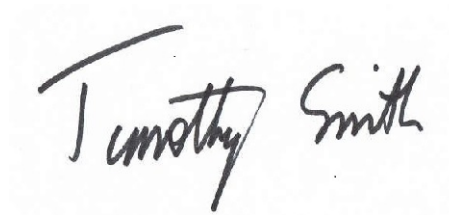
- e) The **Noise and Vibration Impact Assessment** should address the conclusions and recommendations of the Acoustic Report dated 17 May 2020, prepared by Renzo Tonin & Associates.

### **Local heritage items**

As there are several heritage items of local heritage significance in the vicinity of the development site, advice should be sought from the City of Sydney.

If you have any questions regarding the above advice on Pitt Street South Over Station Development Stage 2 (SSD 10376), please contact Hendry Wan, Senior Heritage Officer Major Projects at Heritage NSW on (02) 8837 6090 or at [Hendry.Wan@environment.nsw.gov.au](mailto:Hendry.Wan@environment.nsw.gov.au)

Yours sincerely

A handwritten signature in black ink that reads "Timothy Smith". The signature is written in a cursive style with a large, sweeping 'T' and 'S'.

**Tim Smith OAM**

Director, Heritage Operations

Heritage NSW

Department of Premier and Cabinet

**As Delegate of the Heritage Council of NSW**

1 July 2020