20 June 2017

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Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Attention: Alexandra O'Rourke
Via email: Alexandra.ORorke@planning.nsw.gov.au

Dear Alexandra,

**Exhibition of SSDA 7944 - Barangaroo South Stage 1B Public Domain Works**

I refer to your correspondence, 12 May 2017 advising Council of the exhibition of the abovementioned proposal.

The City has reviewed the information provided as part of the public exhibition and is supportive of the proposal in principle, subject to the issues outlined below being adequately addressed. The City requests these issues be addressed and clarification be provided prior to the application being determined.

The City also seeks clarification as to the future ownership of the public domain proposed within this application. This will assist the City to provide appropriate consent conditions following the response to these comments, as well as to plan future maintenance and cleansing arrangements.

If this information is not provided; the City **Objects** to the proposal.

In general, all public domain finishes, furnishings and details should be consistent with the City’s Public Domain Design Codes to ensure that the public domain is linked to the wider City area as well as allow for future maintenance. These include:

- Sydney Streets and Technical Specifications
- Sydney Lights
- Sydney Signs (including Wayfinding Strategy)
- Sydney Parks.

**Public domain**

- The design of the northern edge of Hickson Park requires greater development and resolution prior to any determination of this application. The interface with Barangaroo Central is unclear as the park is shown to peter out into a large expanse of lawn, despite the heavily detailed southern edge. This park must be designed holistically, and should include a concept for the northern interface that sets parameters for the Central Barangaroo building design to
respond to. There will undoubtedly be wind impacts that the park design will need to mitigate. It would be acceptable for the park construction to be phased to address this, however the current proposal of simply bleeding out the design into a grassed edge is not adequate.

- The interface between the parkland and Hickson Road requires further design development. The proposal has a sharp soft edge with the footway that will likely be an ongoing maintenance concern and no transition or control of pedestrian movement has been provided. It lacks the design resolution that has been applied to the Foreshore Walk and cove.

- The interface between the parkland and the base of the residential buildings requires further development, currently the entrance to the residential buildings is hidden behind large garden beds. Although strictly outside of the scope of the application works, the continuation of Shipwright Walk across Barangaroo Avenue creates an odd relationship with the rest of the public domain.

- The proposal indicates the widespread use of porphyry stone sett paving, particularly around the base of the residential buildings and as an interface to the parkland. Porphyry stone is not easily split evenly and the unevenness of the stone will make it difficult to achieve the smooth surface required by AS 1428.1. This stone is in use elsewhere and these difficulties are evident in their use.

- The concept design seems to indicate that paving materials will bleed into each other. This will blur the distinction between different areas (e.g. street and plaza) and create a degree of confusion over ownership. In addition the differing slip resistance of pavement types needs to be considered.

- The number of vehicle crossovers on the footway is to be reduced or rationalised through creating basement level links. Vehicular crossovers create hazards for pedestrians and other users of the road reserve.

**Community facility**

- SSD 0162_MOD 6 requires the delivery of 3,000sqm of approved community uses as part of Barangaroo South. The Instrument of Approval nominated the public pier as a potential location for community facilities GFA. The subject application maintains a zone on the public pier for a future facility, which would be subject to a separate development application.

- The EIS states that the City is of the view that a community facility (i.e. multifunction space, meeting rooms etc) was not required or needed in the area. However the EIS fails to note that the City has made clear the need for public indoor and outdoor recreation facilities on the site (particularly a district-scale indoor multipurpose court facility) and has also advocated for the provision of cultural and creative facilities. This is not considered in the EIS and should be further investigated in relation to the community uses requirement.

- Additional work with regard to the provision of required community uses and community facilities is required. This work falls into two categories:

  1. Assessment of community facilities options for Barangaroo South:
A more thorough assessment is needed of the requirements of a community facility in this area taking into account a range of stakeholders, including the City of Sydney, in defining the building and uses on the site.

There are key community facilities needs for the whole Barangaroo precinct that are supplementary to any future facility proposed on the public pier. It is noted that no proposals have been put forward for community facilities within Barangaroo South site, as per the approval requirements.

A community facilities plan should be developed for the site. This should include actual land allocated for public benefit. Barangaroo South is an intensely developed site benefiting from substantial uplift. The offer of a future community facility on a timber pier does not constitute the same value or development potential as actual land allocated for public benefit.

2. Assessment of the potential public pier community facility building and uses to ensure later proposals are not compromised by current plans, and are consistent with and complement the current plans:

- **Key adjacencies and interaction between landscape plan and public pier community facility.** There will be a close relationship between any future public pier community facility building in this location, the water interface and therefore the landscape plans which is the subject of this application. Deferral of the community facility proposal will not enable an appropriate assessment to be made of the key adjacencies, urban design, operational factors and impact on view corridors necessary for a potential future building in such a key location.

- **Geotechnical suitability.** The geotechnical capacity to accommodate a potential structure has not been discussed in the EIS. This work should be undertaken to ensure the site can accommodate a potential future public pier community facility building and use. Part of the nominated site is underpinned by ‘sand filled caissons’, however it is not known whether these provide appropriate stability for a site which is permitted to accommodate at least up to 2,000sqm.

**Public art**

- While the City acknowledges that the public art for Barangaroo South will be guided by the Public Art and Cultural Plan (Appendix G) and will be subject to separate approvals as required, it is advantageous for the public art to be considered as early on in the process of the design of the public domain as possible.

- Concept designs for public art for Barangaroo South would be included in the subject public domain application for review ensuring the public art is embedded in the design thinking for the public space. This allows for better integration of the public art into the design of the public domain, allowing the public domain to respond to the artwork if necessary.

- The City notes the reference to the opportunities to implement artwork though the public domain in the form of heritage interpretation strategies. It notes that while artists can draw inspiration from history and heritage material the role of
heritage interpretation is quite specific and should be recognised as distinct from the delivery of public art in Barangaroo South.

**Indigenous heritage and cultural interpretation**

- The EIS notes that consultation has previously been undertaken with the Metropolitan Local Aboriginal Land Council (MLALC). This consultation appears to be in relation to a basement car park and presumably focuses on archaeological cultural heritage rather than interpretation. The EIS does not note more recent consultation, nor consultation on an interpretation strategy.

- The Public Art and Cultural Plan notes that interpretation would be integrated into areas that are the subject of this application. However the proposal does not provide a clear or tangible recognition of Aboriginal cultures or heritages, either via public domain design, public art or an interpretation strategy.

- An interpretation strategy, in accordance with the thematic objectives of the Public Art and Cultural Plan should be prepared in order to ensure that interpretation is integrated into the design of the public domain. The MLALA and relevant groups and organisations should be consulted in the preparation of the interpretation strategy.

**Wayfinding signage**

- The use of City of Sydney wayfinding signage in the main streets is supported.

- Messaging and detail placement should be coordinated with the City for all proposed signage (City of Sydney wayfinding signs as well as BDA signage). Wayfinding messaging should go beyond the boundaries of Barangaroo to create the connections into the wider city centre.

**Wind**

- The proposal should be consistent with wind controls in the Draft Sydney DCP 2012 – Central Sydney. It currently does not achieve the DCP standards in several areas.

- The desired criteria for all areas within the proposed Hickson Park should be 4 metres per second as per the Draft Sydney DCP. Currently points 72-78 and 95-99 apply a criteria of 7.5 metres per second. This is inappropriate in a public park.

- The probability of exceedance for all areas should be not exceed 5% as per the Draft Sydney DCP. Many of the assessed points currently exceed 5%.

- The Pedestrian Wind Environment Study (Appendix L) states that portable café carts are to be used to manage wind impact, however the subject application does not propose portable café carts, nor does it cater for the powering or storage of portable café carts and associated outdoor furniture. Elements such as café carts are temporary and do not provide adequate mitigation of wind effects. Alternate measures need to be provided to ensure that the wind conditions in their own right are satisfactory without the use of temporary features such as café carts. Should café carts be proposed as a feature of the design, adequate furniture, storage and services needs to be documented in the proposal.
Cultural and social programming

- The Public Art and Cultural Plan identifies Wulugul Walk and Watermans Cove as nominated areas for cultural programming. However, the application does not illustrate how or if the design and corresponding management approaches practically support cultural/social programming.

- It is noted that the amenities building for Hickson Park includes storage areas for temporary activations (e.g. temporary furniture in parks) which is a positive feature to enable social/cultural programming. However, the application does not indicate where different forms of cultural/social programming would occur, e.g. indicative space allocations for active cultural/social programming (both for everyday activities and more infrequent medium to large events) and embellishments and infrastructure to support such programming.

- The application (including landscape plans) should be amended to identify areas for cultural and social programming and infrastructure and management plans to support these. Examples of infrastructure and management plans to support these uses include plans of management; 3 phase power; hardstand, curb cuts and indicative traffic circulation for trucks for bumping in out for events; tap water; and equipment storage spaces for small-medium scale programming (chairs, tables, small scale staging equipment, shade devices etc).

Safety and crime prevention

- The CPTED Report (Appendix N) includes generic information and is inadequate to assess the performance of the proposal. The report needs to be further developed with additional detail on crime and safety issues relating specifically to the development and the design.

- The report needs to demonstrate how the design responds to key literature from the NSW Attorney General and Justice Department that is referenced in the application.

- The CPTED Report contains a number of hot spot maps based on publicly available crime data but does not link any of the information to the application. The report needs to be amended to specifically address crime data and the specific types of crimes the design aims to prevent.

- Consultation with NSW Police needs to be carried out and documented to inform the design and the CPTED Report.

- Additional details on the proposed ‘roaming security presence’ are required. Number of guards, areas patrolled, hours, etc.

- Additional details about the intended uses of Hickson Park throughout the day and night are required to allow an assessment of safety and security, and minimise conflict between park users.

- The proposed amenities block should be reconsidered with consideration given to CPTED principles. In particular the men’s facilities where the access arrangements invite antisocial behaviour.
If the intention is to use the park and other public areas for events / public assembly in the future the application needs to consider hostile vehicle access prevention measures such as planting and public art which can withstand an oncoming truck. As noted above, the use of bollards to control vehicles is generally discouraged and alternatives are requested to be explored.

**Sustainability**

- 95% of timber furnishings/boardwalk etc should be FSC-Certified. Without this or equivalent robust certification, the applicant may unwittingly contribute to deforestation in South East Asia/Pacific Region and potentially illegal forestry activities in these locations.

- In line with the applicant’s carbon abatement objectives for the precinct, all concrete works should meet the criteria for maximum credit points under GreenStar Materials – Credit 19.B1 Concrete.

- The Public Realm Lighting Report (Appendix F) makes no reference to energy efficiency as a core objective. Light pollution is referenced, but the plan expresses no energy efficiency intent. While LED lighting is anticipated for all outdoor areas as a logical means to minimise energy consumption this outcome should be confirmed within the application via an explicit commitment. The Sustainability Report itself does make reference to this outcome: “The public domain lighting will be designed with energy efficiency in mind using LED lamp technology”. The Lighting Report should be amended to deliver on this commitment.

- While most waste generated will be heavy inert materials that will likely be recycled to avoid landfill costs, the City is aware that lighter waste materials are commonly being exported to Queensland to avoid the NSW Waste levy. The applicant should commitment to local (NSW) disposal of the fraction of construction and demolition waste that is destined for land fill.

**Ecology and biodiversity**

- The Seawalls / Over-Water Structures Impact Assessment (Appendix Q) identifies that the works will have a positive benefit for biodiversity. Additional information is required to clarify what positive benefits to biodiversity the works will provide.

- It is not clear where the concrete balls and steel plates that will be added for eco-engineering purposes will be located, nor is there any clear indication of what they will look like or what the level of public interaction will be with these features. These must be considered when undertaking the detailed design with Department of Primary Industries (DPI) and Sydney Institute of Marine Science (SIMS).

- At the intertidal and subtidal areas, natural building materials (local substrates) or eco-friendly materials where possible should be considered with habitat features proposed.

- The applicant indicates their intention is to consult with DPI and SIMS to develop a detailed design. This is strongly supported as is the reference to the document developed by SIMS, *Guiding Principles for Marine Foreshore Developments (2016 UNSW)*.
• Pontoons are known to be areas that harbour high levels of non-indigenous species. Additional information is required to demonstrate how these impacts will be mitigated.

If you require any further information please contact Natasha Ridler, Senior Planner, on 9246 7720 or at nridler@cityofsydney.nsw.gov.au

Yours faithfully

Graham Jahn AM
Director
City Planning | Development | Transport