

Our Ref: 17068  
Council Ref: SSDA 8517 & SSDA 8449

7 August 2018

17068

Carolyn McNally  
Secretary  
Department of Planning and Environment  
GPO Box 39 SYDNEY NSW 2001

Attention: Emily Dickson

Dear Emily

**RE: SSDA 8517 and SSDA 8449 - Response to Request for Further Information**

This letter has been prepared on behalf of Mirvac Projects Pty Ltd (Mircac) to respond to the issues raised by the Department of Planning and Environment (Department) and other key stakeholders following their assessment of the Response to Submissions (RTS) reports submitted to the Department in support of SSDAs 8517 and 8449. A Response to each of the issues raised is set out below.

The following additional information is attached in support of this submission:

- Updated Arborist Report, prepared by Lee Hancock, dated 27 July 2018 (**Attachment A**)
- Arborist Report for SSDA 7317, prepared by Earthscape Horticultural Services, dated 28 April 2019 (**Attachment B**)
- Updated Public Domain Plans, prepared by Aspect Studios (**Attachment C**)
- Revised SSDA 8449 Ground Floor and GFA Plans (**Attachment D**)
- Structural Statement, prepared by Arcadis (**Attachment E**)
- Civil Works Statement, prepared by AT&L (**Attachment F**)
- Design integrity statement, prepared by Aspect Studios (**Attachment G**)
- Overarching Interpretation Framework for the ATP, prepared by Curio Projects (**Attachment H**)

## 1.0 Response to Department of Planning Issues

### 1.1 Tree Removal and Pruning in Innovation Plaza

**Table 1 Response to Department of Planning issues relating to Tree Removal and Pruning**

Issue	Response
<b>Tree Removal and Pruning in Innovation Plaza</b>	
<i>The Department requests a response to the issues raised by Council regarding the proposed removal of tree 67 in Innovation Plaza and pruning.</i>	Refer to Section 2.11.
<i>The Department requires the Arborist report to be updated to provide information about:</i>	An updated Arborist report is provided at <b>Attachment A</b> .
<ul style="list-style-type: none"> <li><i>Pruning proposed to each tree and percentage of pruning</i></li> </ul>	<p>As clarified in the updated Arborist Report, the only trees that will be impacted by the Locomotive Workshop redevelopment are:</p> <ul style="list-style-type: none"> <li>• Tree 67 – which will be removed;</li> <li>• Tree 66 – selective pruning to the lower branches resulting in maximum foliage loss of less than 10%;</li> <li>• Tree 68 - selective pruning to the lower branches resulting in maximum foliage loss of less than 10%;</li> <li>• Tree 43 – crown lifting to the lower branches to a height of 4.5m, which is considered to be a foliage loss of less than 10%.</li> </ul> <p>No other trees within Innovation Plaza or Locomotive Street will be removed or pruned.</p>
<ul style="list-style-type: none"> <li><i>Reason for pruning to 5m;</i></li> </ul>	<p>The reason for pruning Tree 43 to a nominal height of 5m was to conservatively ensure that there would be no conflict with service trucks entering the ATP site. However, the updated Arborist Report has amended to proposed height to 4.5m in order to provide consistency with the City of Sydney Street Tree Strategy.</p>
<ul style="list-style-type: none"> <li><i>Impact of pruning to the trees viability</i></li> </ul>	<p>The updated Arborist Report confirms that the proposed pruning to Trees 66, 68 and 42 will not impact the viability of the trees.</p>
<ul style="list-style-type: none"> <li><i>Clarify the height of tree no.67 and retention value, as this was identified as high in the Arborist Report prepared for SSD 7317 public domain upgrades</i></li> </ul>	<p>The updated Arborist Report confirms that an error was made in estimating the height of Tree 67 and confirms that it is 14m high. In addition, in line with the Arborist Report prepared by Earthscape Horticultural Services, dated 28 April 2017 (as provided in <b>Attachment B</b>), the updated Arborist Report confirms that the retention value of Tree 67 is 'moderate'. Mirvac would like to note that Tree 67's retention value is not 'high' as suggested by the Department.</p>
<ul style="list-style-type: none"> <li><i>Provide the arborist report submitted for SSD 7317 public domain upgrades prepared by Earthscape Horticultural Service dated 28 April 2017</i></li> </ul>	<p>The Arborist Report prepared by Earthscape Horticultural Services, dated 28 April 2017 is provided at <b>Attachment B</b>.</p>

Issue	Response
<p><i>Please identify any further measures than can minimise impacts to trees in Innovation Plaza</i></p>	<p>As identified in the Arborist Report, in order to minimise impacts to trees in Innovation Plaza:</p> <ul style="list-style-type: none"> <li>• The removal of Tree 67 will be undertaken by an experienced Certified AQF Level 3 Arborist in accordance with Safe Work Australia Code of Practice 'Guide to Managing Risks of Tree Trimming and Removal Work';</li> <li>• Pruning of Trees 66, 68 and 43 will be undertaken in accordance with AS4373(2007) Pruning of Amenity Trees by an experienced Certified AQF Level 3 Arborist in accordance with Safe Work Australia Code of Practice 'Guide to Managing Risks of Tree Trimming and Removal Work';</li> <li>• Ornamental tree guards will be provided around Trees 66 and 68 to provide protection.</li> </ul>

## 1.2 Entering and Exit movements of trucks using the Loading Dock

*Demonstrate how trucks can enter the loading dock from Innovation Plaza in a forward direction and exit in a forward direction (with all reversing movements occurring within the loading dock).*

### Response

The proposed design of the loading dock does not allow the proposed 10.2m long trucks to enter and exit the loading dock in a forward direction from Innovation Plaza. The swept path plans submitted with the RTS Report for SSDA 8517 illustrated that service and waste vehicles can exit the loading dock in the forward direction but must reverse to enter from Innovation Plaza.

As addressed in Section 1.3 below, the minimum size service truck required to service the Locomotive Workshop is 10.15m in length and the minimum size Refuse Collection truck is 10.2m in length.

Notwithstanding this, further investigations have been undertaken to clearly understand why the service trucks cannot enter and exit the loading dock in a forward direction.

The analysis has found that the area for manoeuvring vehicles within the loading dock is significantly constrained by the proposed access stairs located adjacent to the northern wall above the van parking spaces; the glass barrier that surrounds and protects the Davy Furnace; the size of the loading dock door and the existing heritage columns, as identified within **Figure 1**. Accordingly swept path assessments have indicated that in order for trucks to complete the three-point turn necessary when entering in a forward gear, the following would occur:

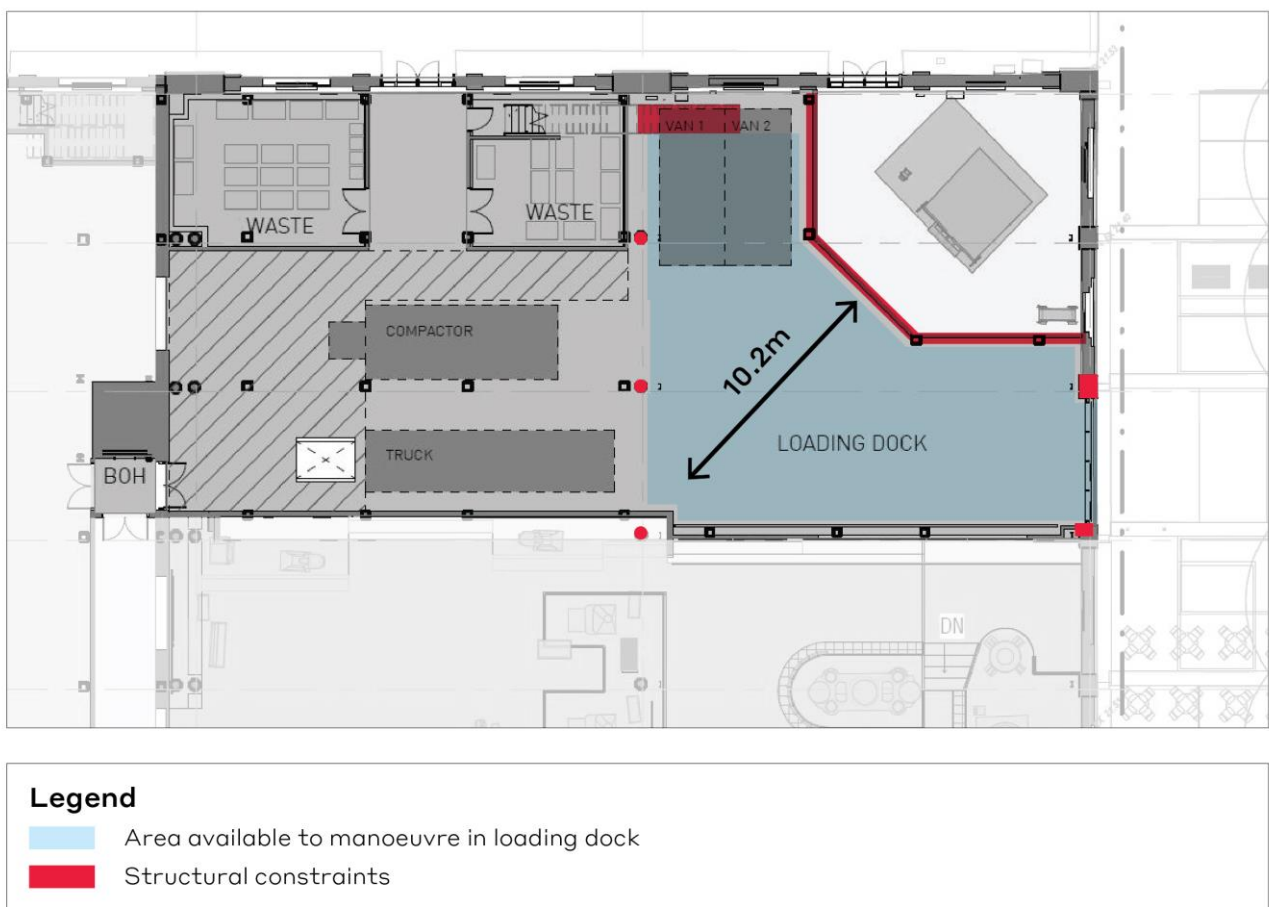
- the 10.15m Large Rigid Truck would conflict with the access stairs above the van spaces, conflict with the Davy Furnace barriers and reverse in very close proximity to the heritage columns. Due to the location of the heritage columns and the loading dock doorway, extending the loading dock wall further south towards the Davy Furnace would not improve the manoeuvrability of the trucks;
- the 10.2m Refuse Collection Truck would need to undertake a 5-point turn and rely on the van parking spaces being unoccupied. Furthermore, there would be a high chance of the trucks colliding with the Davy Furnace barriers, the access stairs above the van spaces and heritage columns. Repositioning of the loading dock wall would also not improve the manoeuvrability of the trucks.

In addition, the installation of a mechanical turn-table within the loading dock has also been assessed and considered to not be an acceptable option for the following reasons:

- the size of the turning circle that would be required would only leave approximately 20-30cm of tolerance space between the rotating trucks and the Davy Furnace barriers, the heritage columns and the southern portion of the loading dock wall. It is projected that there would be a high probability of rotating trucks colliding with the built form of the building;

- the mechanical infrastructure and depth of the pit below a turn-table would be significant and likely give rise to significant and irreversible heritage impacts;
- the visual appearance of a turn-table would give rise to significant visual impacts upon the aesthetics of the space, particularly considering that the portion of the loading dock within Bay 1 has been designed to not look like a loading dock when trucks are not utilising it; and
- the installation of a turn table has a high risk of mechanical failure which would give rise to operational issues such as queueing of trucks and additional conflict with pedestrians.

On the basis that all loading and servicing activities will be undertaken in strict accordance with the provisions that will be set out within the Loading Dock Management Plan, the proposition of trucks reversing a short distance into the loading dock and exiting in a forward direction is considered acceptable.



**Figure 1 Loading Dock manoeuvring constraints**

### 1.3 Minimum size of trucks required to service the retail uses and waste

*Identify the minimum size truck required to service the retail uses and waste be identified, with regard to minimising changes to the road network and permitting vehicles to carry out manoeuvres within the loading dock, rather than within Innovation Plaza.*

#### Response

As set out within the RTS report for SSDA 8517, the two truck design vehicles for the project are as follows:

- a Large Rigid Truck (approximately 10.15m in length); and
- a rear lift compactor Refuse Collection Vehicle (approximately 10.2m in length).

Whilst smaller trucks do exist, these design vehicles have been adopted for the following reasons:

- as discussed in the 'Key Factors to Success' statement prepared by Macroplan (Appendix N in the RTS for SSDA 8517) the appropriate operational functionality and efficiency is a critical success factor for a retail operator. Therefore, if the Department only allow small vehicles (i.e. less than 10.2m long) to service the development, significant operational constraints would be generated that would significantly limit the commercial viability of the retail offer and in particular the supermarket operator;
- the retailers that will occupy Bays 1-4a and in particular the proposed supermarket operators require service vehicles to be 10.15m or larger. The supermarket operators that Mirvac are consulting with have all confirmed that a 10.15m truck is the smallest truck they can use within this development.
- smaller trucks would increase the number of service and loading vehicle movements within the external road network;
- smaller trucks would lead to the requirement for more deliveries and a probability of conflict with other service trucks, the built form and pedestrians;
- the proposed design vehicles are representative of vehicles that will service the site;
- the proposed design vehicles are legally permitted to travel to and from the site; and
- the proposed design vehicles and number of vehicle movements that will be generated by these design vehicles are considered reasonable by Mirvac's traffic consultants (GTA and SLR).

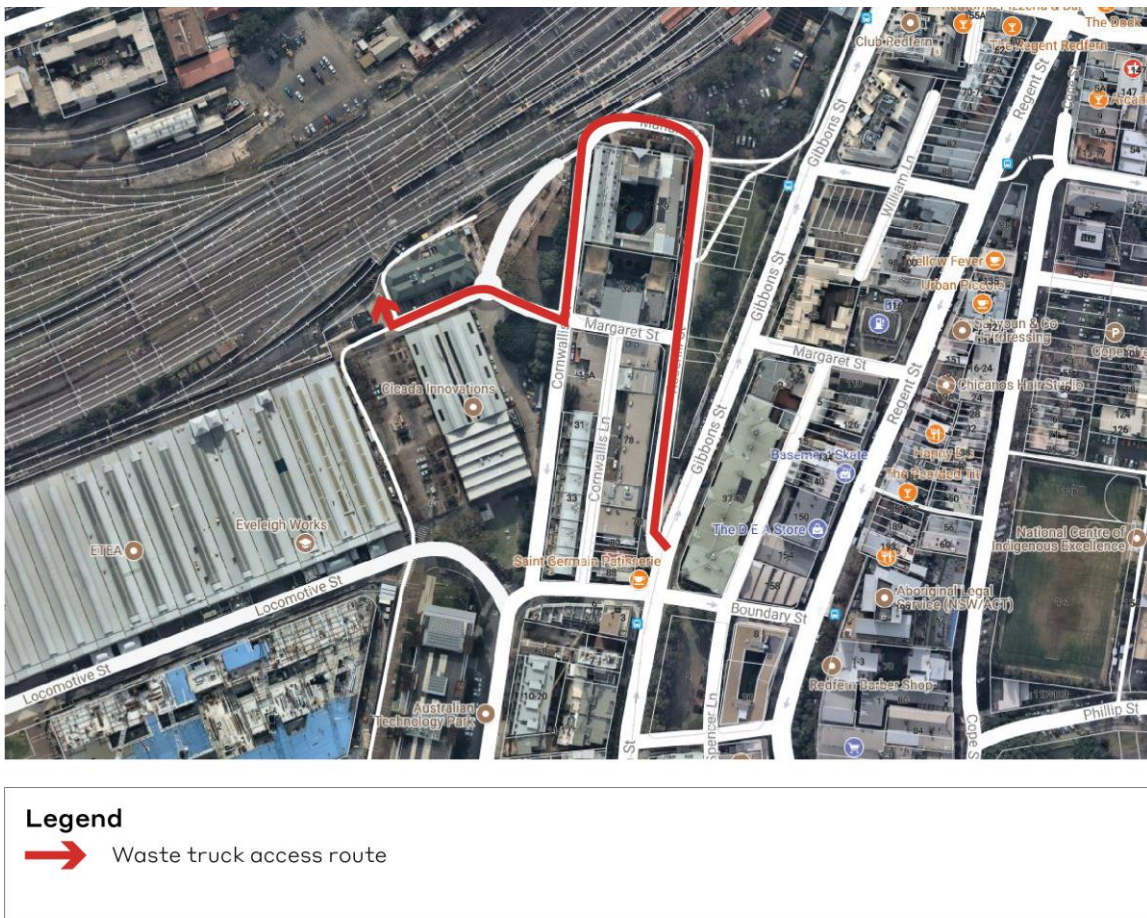
### 1.4 Current waste truck movements

*Advise how waste trucks (i.e. route and length of truck) currently access the refuse area located north of Innovation Plaza.*

#### Response

At present, Refuse Collection Trucks that service the Locomotive Workshop have an overall length of 8.0m and service the site 3 times per week. The trucks enter the ATP site from the northern access off Cornwallis Street at the junction with Margaret Street and then drive between the IBA Building and the NIC Building, before turning into Innovation Plaza and reversing to the waste storage compound located to the north of Innovation Plaza and adjacent to the rail line (refer to **Figure 2**). Staff within the Locomotive Workshop transfer their own waste to the waste storage compound.

The existing waste storage compound is not suitable to accommodate the significant additional quantity of waste that will be generated by both the commercial tenants and the retail operators by the Locomotive Workshop redevelopment. It has been demonstrated within the EIS and the Waste Management Plan Report that the proposed volume and different waste streams can be effectively managed, sorted and stored within the loading dock.



**Figure 2 Existing service access route**

### 1.5 Coaches accessing Locomotive Street

Clarify if coaches will be accessing Locomotive Street and provide a response to Transport for NSW request for a Coach Parking Management Plan.

#### Response

It is not intended that coaches will access Locomotive Street. A response to Transport for NSW request for a Coach Parking Management Plan is provided in **Section 4.3**.

## 1.6 Traffic generation

*The Transport Impact Assessment by GTA has considered traffic generation associated with loading, servicing and pick up and drop off movements. However, traffic generation associated with the retail and commercial uses has not been considered. Although the Department notes no additional car spaces are proposed under SSD 8517, Mod 6 to SSD 7317 proposes to reallocate 201 car spaces in Building 2 for use by visitors to the ATP and Locomotive Workshop. The Department requests further information on traffic generation associated with the retail and commercial uses within the Locomotive Workshop, including an indication of the proportion of visitors and employees that will use various transport modes.*

### Response

As set out in the RTS Reports, Mirvac has adopted the following car parking strategy:

- Allocate 232 of the 'public visitor' car spaces within the Chanel 7 car park for use by the CBA employees from Buildings 1 and 2.
- Allocate the 201 car parking spaces at the lower ground level of Building 2 for use by visitors to the ATP and the Locomotive Workshop to provide visitor spaces closer to the locomotive Workshop.

The outcome of this car space 'swap' is that in total 319 public/ visitor spaces will be provided within the ATP, which is 31 less than is currently provided. Therefore, there will be no adverse traffic impacts generated by the number of cars visiting the Locomotive Workshop.

Whilst a number of new workers and visitors will be commuting to the Locomotive Workshop, it is estimated that many of the visitors will work within Buildings 1, 2 and 3 or live within the surrounding locality. Accordingly, it is expected that 85-90% of the day to day visitors will walk to the retail uses. Furthermore, given the restriction of on-site car spaces, this is likely to result in the visitors that do not walk to the Locomotive Workshop to use public transport or other non-car modes of transport.

In addition, the number of workers within the Locomotive Workshop is estimated to be approximately:

- 2,500 within Bays 5-15; and
- 250 within Bays 1-4a.

As required by the SEARs, a Green Travel Plan was submitted with the EIS for both SSDAs 8517 and 8449. This set out that the whilst transport mode is an individual choice, the site should adopt the following estimates:

- 40-60% of employees arriving by train (including the new Metro post 2023);
- 15-25% of employees arriving by bus;
- 5-10% of employees arriving by cycling
- 5-15% of employees arriving by walking; and
- <10% arriving by private vehicle.

These targets are considered to be broadly comparable with what was observed in the Sydney CBD in the 2011 Census and both the ATP and Sydney CBD have a similar access to high quality public transport services, and are readily accessible from the City of Sydney's cycling network.

Post 2023, the CBD Metro operations will also commence and the site will also be readily accessible from the new Waterloo station.

Given a total of 261 bicycle spaces are being provided in conjunction with the Locomotive Workshop development and the Green Travel Plan provides a number of initiatives to encourage and incentivise public and active transport opportunities place, it is not considered that the number of non-car trips generated by the Locomotive Workshop will give rise to any unacceptable impacts.

### **1.7 Bicycle parking in the public domain**

*The EIS states 46 visitor bicycle parking spaces will be provided in the public domain. However, the 'Cycle Access Plan' in the Public Domain Response to Issues Package' shows only 34 spaces. Please clarify and update plans accordingly.*

#### **Response**

An updated 'Cycle Access Plan' is provided at **Attachment C** that shows the location of the 46 bicycle spaces that will be provided in association with the Locomotive Workshop redevelopment.

### **1.8 Bicycle Parking within Bay 15**

*Provide a minimum of 215 bicycle parking spaces within Bay 15 for end of trip facilities to align with cycle parking relate in the City of Sydney DCP.*

#### **Response**

Updated plans included in **Attachment D** illustrate a minor reconfiguration to the layout of the Ground Floor level of Bay 15 to enable 215 bicycle spaces to be provided.

### **1.9 Public Domain Works**

*Provide a plan clearly identifying the extent of public domain works proposed under SSD 8517.*

#### **Response**

Aspect has prepared a Locomotive Workshop Public Domain Concept Plan clearly identifies the extent of works proposed under SSD 8517. It is noted that the detailed information that relates to the proposed works are included within Appendix D – Public Domain Response to Issues Package at that included within the RTS submission for SSDA 8517 and the plans that are included within **Attachment C**.

### **1.10 Signage**

*Address the response from the Heritage Council which identifies signage zones above the opening on the southern façade and the location of the proposed make up air louvres.*

#### **Response**

Please refer to Section 3.7.



## 2.0 Response to City of Sydney Issues

### 2.1 Heritage Issues

*The heritage issues raised by the City of Sydney have largely been addressed by the amended design and proposed conditions of consent.*

#### Response

Noted.

### 2.2 Heritage Curation

*With particular reference to proposed Condition of Consent 1.4 (on going curation, interpretation & conservation), the Department are encouraged to require that the 'strategy' to be prepared should include a financial plan with a commitment for ongoing funding for curatorial programs, interpretation updates as well as repairs and maintenance of moveable heritage beyond the issue of Occupation Certificates. The City is concerned that without a clear commitment to funding, there is a risk that the various heritage management documents to be prepared and updated will not be implemented.*

#### Response

Mirvac are committed to providing on-going curatorial programs and management of the cultural heritage initiatives, regardless of the funding arrangement and as stated in the RTS, Mirvac are likely to partner with a suitable entity or a number of suitable entities to undertake the curation and cultural heritage tourism management and operations.

### 2.3 Glazing

*The Department are encouraged to impose a condition to ensure that the glazing specified as part of the materials and colours schedule is clear and not tinted glass.*

#### Response

Tinted glass is not proposed to be used within the proposed development.

### 2.4 Signage zones for Bays 4 and 4a

*The signage zones for Bays 4 and 4a should relate to building identification/ precinct signs and not advertise an individual tenant or any third part advertising.*

#### Response

Development consent is only being sought for signage zones within SSDA 8517. The exact nature, form and type of signage will be subject to a separate development application which will (in all likelihood) be submitted to the City of Sydney for assessment and then will be assessed on its own merits.

### 2.5 Brick paving in Innovation Plaza

*The proponent has not addressed the City's concerns relating to the existing brick paving within Innovation Plaza, which 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.*

#### Response

Mirvac's structural engineer (Arcadis) has provided a memorandum (**Attachment E**) that the existing slab, adjacent to the entry of the Locomotive Workshop's loading dock entry in Innovation Plaza is in good condition and is capable of withstanding trafficable loads up to AS 2890 definition of a Heavy Rigid Vehicles classification (i.e. typically up to 12 tonnes Gross Vehicle Mass).

In addition, AT&L Mirvac's civil engineers (AT&L) has provided a statement (**Attachment F**) that confirms that on the basis of Arcadis' findings that the existing brick pavers that will be placed and mortared in, on top of the slab in Innovation Plaza will provide sufficient structural strength to support the frequency and size of trucks proposed to service the loading dock.

## 2.6 Western Turntable on Locomotive Street

*Section 4.34.2 in the RTS report for SSD 8517 refer to investigations into making the existing 'informal' roundabout outside Bays 14 and 15 trafficable. Given that Locomotive Street is to be dedicated to the City in the future, the City should be consulted on the findings of those investigations with confirmation provided that any outcome is in accordance with the City's policies, standards and specifications. Concerns are raised about ongoing maintenance and the potential for public liability hazards in a publicly accessible area.*

### Response

Mirvac have decided to remove this element from SSDA 8517 and any changes will be sought under a modification to SSDA 7317.

## 2.7 Restriction on size of vehicles to service the Locomotive Workshop

*A condition is recommended that restricts the size of vehicles servicing the property not to exceed 10.2m, in accordance with the swept path information provided.*

### Response

Mirvac are happy to accept a condition of consent that restricts to size of vehicles servicing the property to a maximum of 10.2m.

## 2.8 Servicing Access Route

*It is the City's preference that the service vehicle travel route should exclude the Shared Zone on Marian Street. If Option 1 via Rosehill Street and Margaret Street is pursued, as stated in previous correspondence, any changes to the existing road network will need to be referred to the Local Pedestrian and Traffic Calming Committee for endorsement and the applicant bears the risk that works may not be endorsed.*

### Response

Mirvac's preference is to utilise Option 1 – the Rosehill Street- Margaret Street-ATP site and will work with the Local Pedestrian and Traffic Calming Committee to seek endorsement for the 11.5m-12m extension of the current Rosehill Street 'No Stopping' parking restriction near Margaret Street.

To clarify, this extension would only require the relocation of a single signpost and would result in the loss of two on-street car spaces as illustrated in **Figure 3**. No other changes to Rosehill Street or Cornwall Street would be required.

Notwithstanding this, as outlined in the RTS report, travel by the nominated 10.2m rigid truck via Option 2 – the Rosehill Street-Marian Street-Cornwallis Street -ATP site route is physically possible, legal and is not envisaged to result in any safety or operational issues. Mirvac therefore do not accept the Council's proposition of excluding the use of Option 2, if, for unforeseen circumstances, Option 1 cannot be used.

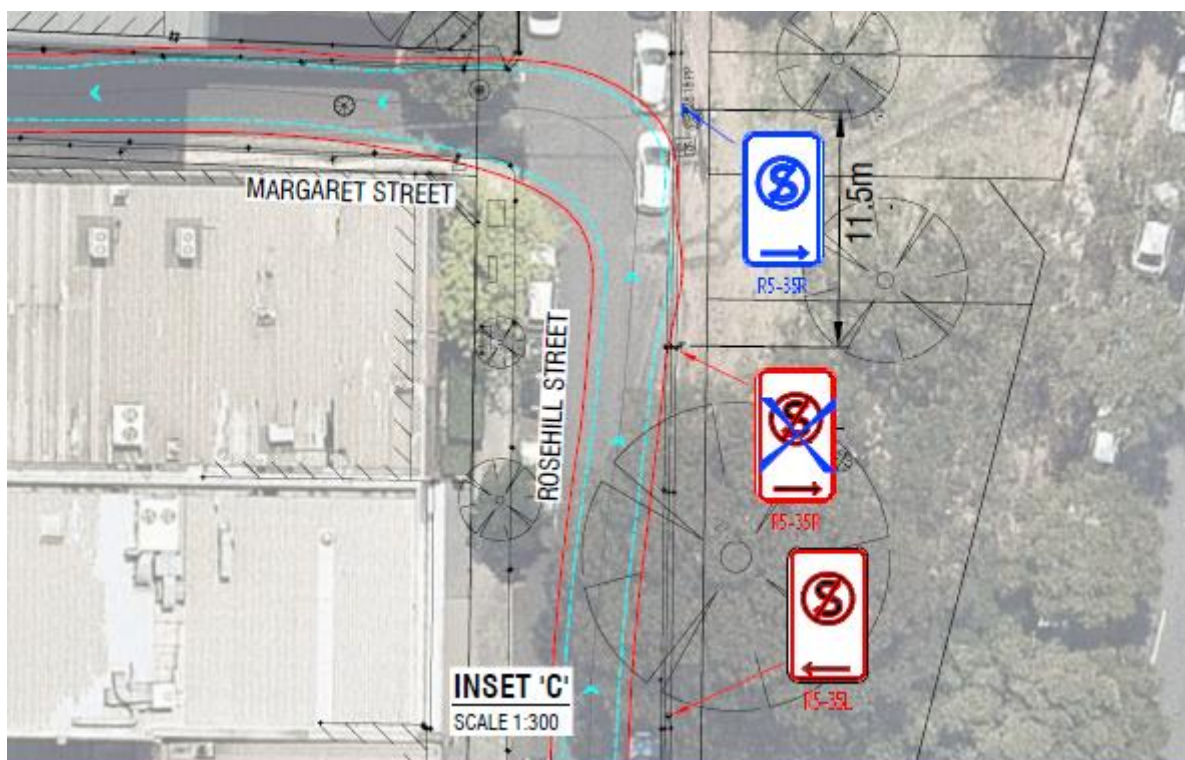


Figure 3 Proposed extension of the Rosehill Street parking restriction area

## 2.9 Flooding

The City suggest that the proponent undertake further investigations to address the flood risk associated with the site and give due consideration to the following:

- Using flood compatible materials up to the Flood Planning Level;
- Ensuring no electrical appliances or connections will be affected up to the Flood Planning Level; and
- Installing physical barriers – such as flood prone doors, etc.

### Response

The Flooding and Stormwater Statement that was submitted with the RTS for SSDA 7317 confirms that on-site detention for all stormwater run-off generated in the ATP site is provided within the public oval and tennis courts located to the north of Henderson Road. It further notes that a Stormwater Management Report dated 2005 confirmed that the top water level within the basin for the 100 year ARI event is RL 15.75.

The existing site survey plans show that the ground level of the public domain area in Innovation Plaza and immediately adjacent to the southern side of the Locomotive Workshop to the north of Locomotive Street is approximately RL 21.4m which is approximate 5.5m higher than the 100 yr ARI flood level furthermore Aspect has confirmed that the finished floor level of the paved area adjacent to the southern façade of the Locomotive Workshop will be RL 21.6 as illustrated on the Existing Levels plan included in **Attachment C**.

On this basis, it is not considered necessary for flood compatible materials or flood barriers to be required, or special requirements for electrical appliance or connections be implemented.

## 2.10 Trees within Rosehill Street/ Cornwallis Street servicing route

Drawing 610.17901-5K04B within the swept path diagram package indicates that at least 4 trees would require removal to accommodate the servicing route along Rosehill Street and Cornwallis Street. None of the reports or documentation provided with this application has addressed the potential removal of those trees. Generally, the City does not support tree removal for the purpose of creating car parking spaces.

### Response

Drawing 610.17901-SK04B, prepared by SLR and included within its Traffic and Transport Response to Submissions Statement that accompanied the RTS for SSDA 8517, did not intend to propose any changes to the landscape islands on Rosehill Street or Cornwallis Streets or tree removal in those islands. The plan simply meant to illustrate where the 12m of kerbside parking (i.e. two car spaces) that would be lost on Rosehill Street in extending the current 'No Parking Zone' to accommodate trucks turning into Margaret Street could be re-provided should Council consider Option 1 (Margaret Street) to be preferred over Option 2 (Marian Street) and require 'no nett change' to publicly available street car parking. To be clear, neither Option 1 or 2 require the removal of any existing landscaping to accommodate truck movements.

## 2.11 Arborist Report

**Table 2 City of Sydney Issues with the Arborist Report**

Issue	Response
<ul style="list-style-type: none"> <li>A row of Plane trees in Innovation Plaza will require pruning in the form of crown lifting to a height of 5 metres for truck clearances. The report does not indicate the percentage of canopy required to be pruned/ removed from each tree. Furthermore, 5 metres crown lifting is an excessive height, especially given that the City prunes all street trees over the roadway to a maximum of 4.5 metres height.</li> </ul>	<p>The Arborist Report has been updated to provide further information, specifically it states that:</p> <ul style="list-style-type: none"> <li>Tree 66 – will have selective pruning to the lower branches resulting in maximum foliage loss of less than 10%;</li> <li>Tree 68 – will have selective pruning to the lower branches resulting in maximum foliage loss of less than 10%;</li> <li>Tree 43 – will have crown lifting to the lower branches to a height of 4.5m, which is considered to be a foliage loss of less than 10%.</li> </ul>
<ul style="list-style-type: none"> <li>The pruning required to the remaining row of trees in Innovation Plaza has not been addressed and the full extent of canopy required to be removed and impact on the viability of the trees is unknown.</li> </ul>	<p>As confirmed in the updated Arborist Report, Trees 66, 68 and 43 will be pruned within the ATP site as part of the Locomotive Workshop development. The selective pruning will result in a maximum loss of 10% of foliage, which will not impact upon the viability of the trees.</p>
<ul style="list-style-type: none"> <li>The report suggests that Tree 67, which is proposed for removal to facilitate the loading dock is 6 metres in height. This is incorrect and under values the tree substantially. The actual height of the tree is estimated as being close to 14 metres.</li> </ul>	<p>The updated Arborist Report confirms that an error was made in estimating the height of Tree 67 and confirms that it is 14m high.</p>
<ul style="list-style-type: none"> <li>The report suggests transplanting Tree 67 to a new location on site. However, this suggestion would be impossible to achieve due to the existing conditions surrounding the tree and extent of root ball required to successfully transplant a semi-mature tree of this size.</li> </ul>	<p>Noted. The updated Arborist Report confirms that the potential transplantation of Tree 67 is not possible.</p>

Issue	Response
<p>The report has undervalued the retention value of Tree 67 by giving a rating of low. However, given the report has indicated good health and condition for the tree and a useful life expectancy of more than 40 years, this would normally give a tree a High Retention Value. This tree has previously been given a High Retention Value in the Arborist Report submitted for the SSD 7317 for the Public Domain Upgrade of the entire site. It is the City's preference that the tree is retained.</p>	<p>It should be noted that the City of Sydney are mistaken as to the retention value given to Tree 67 in the Arborist Report prepared by Earthscape Horticultural Services, submitted for the SSD 7317 public domain upgrade works. The retention value for Tree 67 in the Earthscape Report and in the updated Arborist Report, is 'moderate'.</p> <p>It is not possible to retain Tree 67 and provide truck access to the loading dock within the Locomotive Workshop.</p> <p>Furthermore, the removal of Tree 67 is considered acceptable for the following reasons:</p> <ul style="list-style-type: none"> <li>• In comparison to other trees in Innovation Plaza, the Earthscape arborist report and updated Arborist Report prepared by Lee Hancock Consulting, Tree 67 has only a 'moderate' retention value and no special ecological or heritage significance.</li> <li>• A significant number of new trees are to be planted and upgrade works to the public domain area across the ATP site are proposed under SSDA 7317. If necessary, Mirvac can provide 1 additional tree elsewhere in the public domain area to compensate for the loss of Tree 67.</li> <li>• The removal of Tree 67 will not significantly impact the rhythm of the avenue of the trees in Innovation Plaza to any great degree or impact the design quality of the public domain as designed and confirmed by Aspect (refer to <b>Attachment G</b>).</li> </ul>

## 2.12 Conditions of Consent

*The City requests that if the Department are minded to approve the applications, in addition to the above recommendations, all of the conditions previously recommended in Attachment A and the recommended conditions within the body of the City's letter dated 14 December 2017 are imposed.*

### Response

Mirvac will respond to the Department separately in relation to the proposed conditions of consent that the Council has issued in Attachment A. Mirvac has also responded to each of the other proposed conditions within this letter or the RTS documents.

In addition, once draft conditions are prepared and finalised by the Department, Mirvac would like the opportunity to provide comment on the draft conditions prior to them being finalised and issued with the Assessment Report to the Independent Planning Commission.

## 3.0 Response to the NSW Heritage Council Issues

### 3.1 Heritage Interpretation

*It is still unclear how the interpretation plan is informing the detailed design, in particular the detailed design of the proposed loading dock and travelator. We therefore recommend that the Stage 2 Heritage Interpretation Plan and detailed design for the Locomotive Workshop be submitted for approval prior to the issue of the first Construction Certificate. This is to ensure that the detailed design, in particular for the proposed loading dock and travelator, is informed by the interpretation plan and has regard for the overall interpretation of the site. This will enable a holistic assessment of the works. The plan must also take into consideration how lighting and signage will assist in the interpretation experience.*

#### Response

To clarify, the Stage 2 Heritage Interpretation Plan will include details that only relate to enhancing the interpretation of the Locomotive Workshop. The base build design for the loading dock, travelator and any other functional elements such as lighting and signage have no bearing on the interpretation of the Locomotive Workshop and therefore the detailed design for these elements will be prepared as separate specialist design packages that will be managed as part of the base building works and tenancy fit-out works. Not as part of the interpretation planning.

The overarching interpretation framework for the ATP (as appended to the RTS Reports) is included at **Attachment H** for ease of reference. This framework demonstrates the process that is being undertaken in order to prepare the Stage 2 Heritage Interpretation Plan and the importance of its integration with other Interpretation Plans that are currently being prepared for other elements across the ATP site.

The finalisation of the Stage 2 Heritage Interpretation Plan is very much reliant on the base build elements being completely finalised and the tenants for the commercial and retail spaces being confirmed. This is to ensure complete consistency across the entire development. The Stage 2 Heritage Interpretation Plan for the Locomotive Workshop will include many different concepts that will be finalised as a result of a detailed design and consultation process. Foundry interpretation concepts have already been proposed as part of the travelator experience and concepts for appropriate homage to the workers of Eveleigh have already been identified within the pre-lodgement Heritage Sub-Panel consultation sessions, however in order for the concepts to be finalised, significant stakeholder consultation is required to be undertaken.

As set out in the RTS Reports, Mirvac has proposed a 'base-build detail strategy' that specifically sets out the where detailed design documentation will be provided to the Heritage Council and the City of Sydney Council for comment prior to the issue of the relevant construction certificate. However, it must be understood that the detailed design of the base building elements does not require the heritage interpretation details to be confirmed.

Mirvac therefore do not accept the proposition by the Heritage Council that the detailed design and the Stage 2 Heritage Interpretation Plan be submitted for approval prior to the issue of the first Construction Certificate. This has not been required for SSDA 7317, or other significant heritage projects such as 200 George Street and Wynyard Walk.

### 3.2 Heritage expertise

*The Heritage Council request that in addition to a suitable qualified and experienced heritage consultant being nominated for this project, the nominated heritage consultant is to provide ongoing advice to tradespeople undertaking the proposed works throughout the construction period to ensure that significant fabric is not damaged during the works.*

#### Response

Mirvac agree. A suggested condition of consent is as follows:

*“An experienced heritage consultant is to be commissioned to work with the consultant team throughout the design development, contract documentation and construction stages of the project. The heritage consultant is to be involved in the resolution of all matters where existing significant fabric and spaces are to be subject to preservation, adaptive reuse, recording and demolition. The heritage consultant is to be provided with full access to the site and authorised by the applicant to respond directly to Council and the Heritage Council where information or clarification is required regarding the resolution of heritage issues throughout the project.*

*Evidence and details of the above commission on the above terms are to be provided to the PCA prior to the issue of Construction Certificate 1 – Demolition (CC1) or commencement of work on site whichever is the earlier.”*

### 3.3 Detailed Design Information

*The Proposed Conditions of Consent – SSDA 8449&8517 lists additional information to be submitted to the Heritage Council for comment prior to the issue of the nominated Construction Certification. In addition to this list, we recommend the following information also be submitted.*

- Details of the internal base building lighting, including type of fixtures and the lighting proposed to emphasise key heritage elements and fabric to assist in the interpretation experience (understanding the tenancy lighting will be part of future fitout DAs).
- Any required handrails including design and location. The architectural response notes no handrails are required for the raised floor. However, the Response to Issue Report notes handrails will be required.
- Details of external substation works including proposed materials and finishes.
- Details of inter-tenancy walls, including alternative design solutions such as a retractable fire door system noted in the architectural response.

#### Response

Mirvac has worked closely with the Heritage Council and it should be comfortable that Mirvac has continued to consult with its representatives since lodgement of the EIS reports and through the RTS stage. Mirvac is happy to continue to consult with the Heritage Council informally in relation to the detail of the lighting, handrails, substation materials and finishes and intertenancy walls. However, Mirvac consider that it would cause significant delay to the construction program if it were required to issue detailed drawings for comment to the Heritage Council on every aesthetic matter. Therefore, Mirvac do not accept the Heritage Council’s proposition to add the additional items to the proposed conditions of consent, but would like to reassure the Heritage Council that that all matters such as those listed above will be determined in conjunction with advice from Mirvac’s nominated Heritage Consultant as per the suggested condition of consent included within Section 3.2 above.

### 3.4 Proposed Roof Plants

*The Heritage Council understands that the proposed roof plants will be located within the valleys of the existing roof and screening is not proposed. However, they may be visible from a distance. It is therefore recommended that the layout for roof plant equipment is designed to be as compact as possible to reduce the visual clutter.*

## **Response**

As stated in the RTS documents, the proposed roof plants have been designed to reduce the visual impacts from street level and from passing trains. Mirvac will endeavour, in the detail design process to ensure that they are as compact as possible in accordance with the Heritage Council's recommendation.

### **3.5 Signage zones on the Service Towers above Bays 4 and 4a**

*It is understood the signage plan will be subject to a separate application. However it is recommended that the proposed signage on the roof service towers be removed from the scope of works. The location of these signage zones has the potential to have adverse impacts on the building aesthetic, in particular due to its scale.*

## **Response**

Development consent is only being sought for signage zones within SSDA 8517. The exact nature, form and type of signage will be subject to a separate development application which will be referred to the Heritage Council for comment and assessed on its own merits. Mirvac do not accept the Heritage Council's view that they should be removed and are continuing to seek approval for the signage zones on the service towers as they will provide a powerful location marker for the Locomotive Workshop and South Eveleigh as a whole for passers-by on the trains.

### **3.6 Signage Plan as part of the Interpretation Strategy**

*In addition, it is recommended that the signage plan be developed as part of the interpretation strategy to ensure signage is visually consistent and specifically designed to respect the integrity of the industrial character of the place.*

## **Response**

As set out in the Heritage Response Report, prepared by Curio Projects, only signage that is considered to be 'interpretive' is to be included within the Stage 2 Heritage Interpretation Strategy. All other signs that will be proposed within the signage zones will be considered as part of a separate development application. Within these development applications, heritage impacts and the signs consistency with the industrial character of the site will also be assessed.

Therefore the proposed signage zones have no relation to the Stage 2 Heritage Interpretation Plan as they are not intended to be used for 'interpretation' purposes.

### **3.7 Signage zones above the openings on the southern facade**

*It is also observed that signage zones above the openings of the southern façade may conflict with the proposed make up air louvres. This should be resolved prior to submission of any future signage application.*

## **Response**

As part of the design detail process, smoke modelling is currently being undertaken to ascertain the number of air louvres that will be provided above the openings along the southern façade. Mirvac will then develop the detailed design of the louvres and signage zones. Mirvac therefore seek to retain the extent of the signage zones on the southern façade as previously provided. However, it is noted that all signage will be subject to separate approvals.



### **3.8 Introduction of new services**

*The introduction of new services including electrical and hydraulic services to be undertaken sensitively and with minimal impact to significant fabric and spaces and in accordance with the CMP. This should be done in consultation with the nominated heritage consultant to ensure adverse impacts are minimised. Accurate detailed plans must be developed that define the reticulation of services to ensure routes are appropriately planned to minimise impacts to significant fabric and spaces.*

#### **Response**

Mirvac has an appointed Heritage Consultant for the project and they will be consulted in regard to the reticulation of all new services to ensure that the works will be undertaken sensitively and in accordance with the CMP.

## 4.0 Response to the Transport for NSW Issues

### 4.1 Locomotive Street Layout

*The response to submissions indicates that following the request from TfNSW, significant consultation has been undertaken. As a result the design for Locomotive Street was finalised and submitted to DP&E for approval under Condition B53 of the consent for State Significant Development 7317.*

*It is stated that the provision for coaches is not geometrically possible, nor is it considered to be warranted based on the proposed land use that will replace the existing function/event use. That notwithstanding further consultation has been undertaken with TfNSW with respect to the provision for coaches.*

*TfNSW will continue to work with the proponent on the design of Locomotive Street as part of the consent for State Significant Development 7317.*

#### Response

Noted.

### 4.2 Loading Dock Management Plan

*The response to submissions proposes to prepare a Loading Dock Management Plan to ensure that all loading activities are undertaken outside of peak pedestrian hours and to manage truck queuing.*

*It is also suggested that the combination of time limitations, physical landscaping and street furniture provision will be provided to passively manage (avoid and mitigate) risks associated with trucks reversing into the subject loading docks.*

*TfNSW requests that the applicant be conditioned to prepare a Loading Dock Management Plan to reduce the likelihood of conflict between vehicles and pedestrians, in consultation with the Sydney Coordination Office. In addition to the measures identified, active management measures (e.g. traffic controllers) should also be considered to ensure pedestrian safety is maintained at all times.*

#### Response

A suggested condition of consent is included in the RTS reports in relation to the provision of a Loading Dock Management Plan.

### 4.3 Events/ Function - Coach Parking Management Plan

It is noted that the event and function component of the existing development will be replaced by commercial uses that are proposed as part of SSD 8157 for bays 5-16. However, as stated in the response to submissions, as part of the activation of the Locomotive Workshop, some events are still proposed to be held within Bays 1-4a and Innovation Plaza on a regular basis. As a result, provision for coaches should be incorporated into the proposed development.

TfNSW requests that the applicant be conditioned to prepare a Coach Parking Management Plan in consultation with the Sydney Coordination Office within TfNSW, prior to the issue of the Construction Certificate.

Details on how vehicles, including coaches, accessing functions can be accommodated within Locomotive Street should be provided. If provision for coaches cannot be accommodated along Locomotive Street, an alternative location along other internal streets within the ATP should be identified, in consultation with the Sydney Coordination Office.

#### Response

In conjunction with SSDA 7317, it is intended that one permanent coach parking space will be provided on Davy Road West and one temporary coach parking space will be provided on Central Avenue north as illustrated in **Figure 4**. The details of these proposed coach parking spaces have been confirmed within Mirvac's correspondence to TfNSW pursuant to Condition B52 to SSDA 7317.

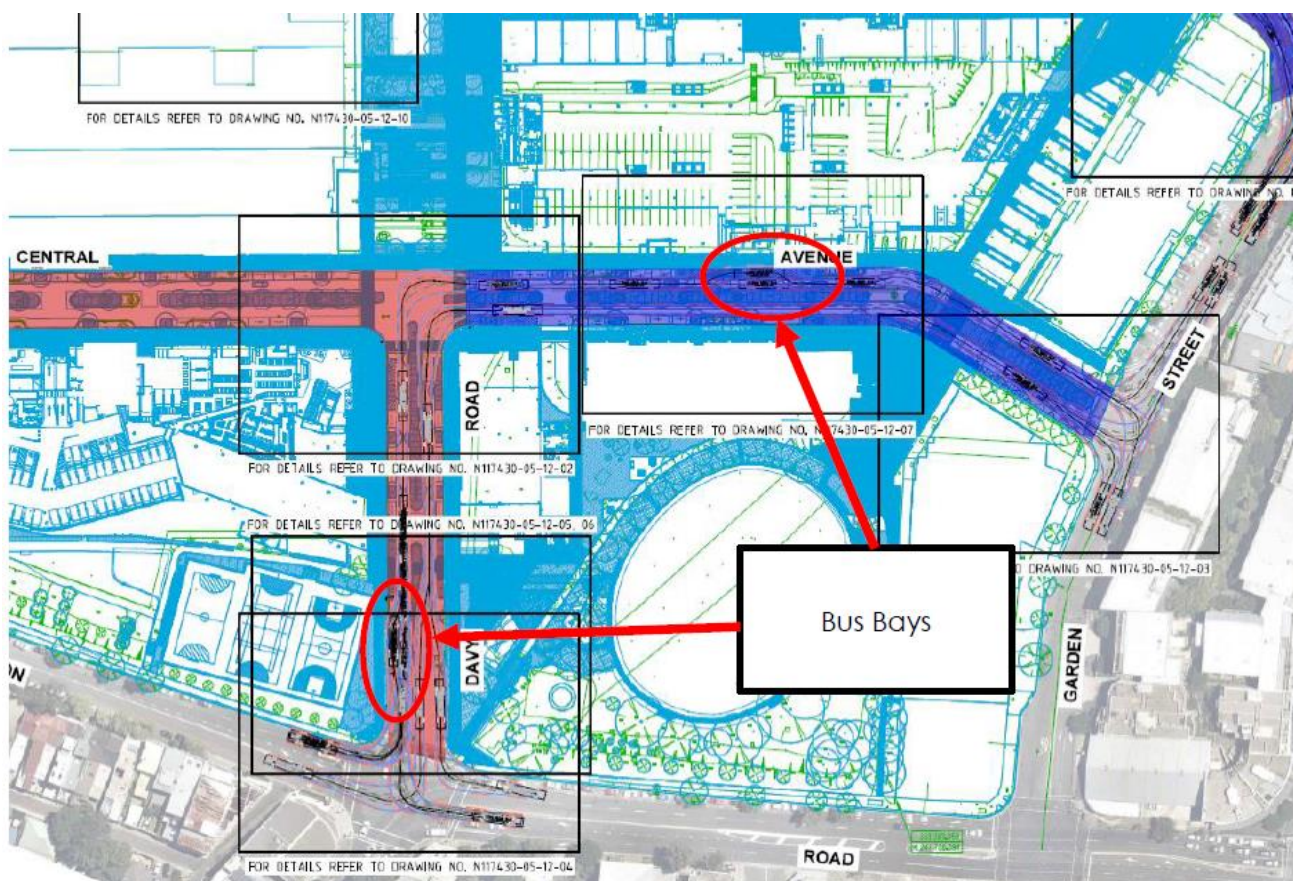


Figure 4 Coach parking bay location plan

Notwithstanding this, as set out in the RTS Report for SSDA 8517, the likely events that will take place within the Locomotive Workshop and Innovation Plaza, will be community- based temporary events or private corporate events whereby visitors will travel by public transport, taxi's or their own private means. Not coaches. Accordingly, it is not considered necessary for a Coach Parking Management Plan to be prepared for the Locomotive Workshop redevelopment.

#### **4.4 Construction Pedestrian and Traffic Management**

*The proponent agrees to the imposition of a condition of consent to this effect.*

*TfNSW requests that the applicant be conditioned to prepare a Construction Pedestrian and Traffic Management Plan as per the previous advice provided.*

#### **Response**

Mirvac agree.

We trust the matters addressed above, give the Department all the information that it required to now complete the assessments of SSDAs 8517 and 8449. Please don't hesitate to contact me should you require anything further.

Yours sincerely,

*Claire Burdett*

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