

6 September, 2019

The Independent Planning Commission
Level 3, 201 Elizabeth Street
SYDNEY NSW 2000

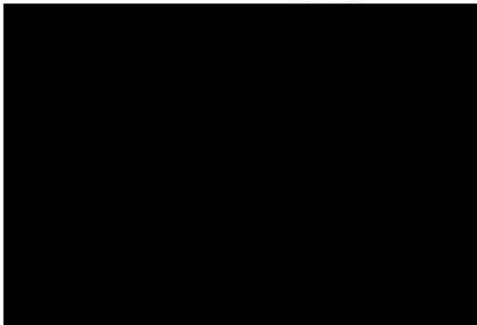
Dear Commissioners

Submission in response to The Star MP08_0098 (Mod 13)

I refer to the recent public meeting and enclose my submission.

For the purpose of the public record, please redact my personal details, signature, location and background information.

Yours faithfully,



Please redact my name, location, signature & background information

Submission in response to The Star MP08_0098 (Mod 13)

1. Background Information

[REDACTED]
[REDACTED]
[REDACTED], I am familiar with the site and key considerations at the time, and since then; in particular the nuances around the massing and scale, and location with the site and building aesthetics later described by Cox as *'my worst building by far'*¹. This includes subsequent changes to the complex which were approved under Part 3A in 2009 for a 10 storey hotel, above the three storey podium, and the series of modifications that have followed with the current proposal, namely Modification 13, for a 237 metre high rise hotel/residential tower (c 67 storeys).

[REDACTED] Founded in 2012 in response to then proposed state-wide planning reforms, today, I continue to work with a number of groups and individuals across the Sydney basin advocating for better planning outcomes. Today legislation and regulations are still seen as problematic by community, with the spot rezonings and the continuing use of Part 3A six years on, key concerns. Likewise, the failure to implement key reforms previously recommended by ICAC, with the perception that lobbyists and political interference still interfere with the planning system, which can often see poor planning outcomes. Likewise, there is growing discontent about the failure for the community voice and public interest to be adequately heard.

[REDACTED] [REDACTED] As a group we worked closely with Frasers in response to the Concept Plan for Central Park. However a series of subsequent Modifications under Part 3A saw the land use substantially change, with the population doubling from 2,500 to more than 5,000 people. Today, the precinct accommodates c. 1,000 people per hectare. This has seen a number of challenges emerge, which are often well not understood. This includes the lack of open space across Chippendale, with less than 1 sqm per resident, and the project's impact on the cost of housing, with 47% of resident today, experiencing housing stress. There are also significant issues emerging around the interplay between late night trading and local amenity, with the consequence this is seeing a high transient population.

While Star Casino project and Central Park are completely different projects, many of the challenges are similar, i.e. an overdevelopment of the site, and its subsequent consequences. These challenges are often not well considered by the applicant's consultants.

¹ <https://www.indesignlive.com/people/philip-cox-a-half-century#ixzz2eiJSgodl>

2. Greater Sydney Commissions Review & and the Independent Planning Commission

The Minister has tasked² the Greater Sydney Commission (GSC) with conducting an independent review of the planning framework for the 'Western Harbour Precinct', for the purpose of assessing the efficacy of the current development controls, and any recommendation the Commission might make to ensure good planning outcomes for the Western Harbour Precinct'. The designated area includes Pyrmont Peninsula, Powerhouse Museum, Fish Markets, Broadway (in part) and Wentworth Park.

The request follows extensive media in response to Star Casino's plans for a 237 metre tower complex at Pyrmont (c 67 floors), largely facilitated by the Star Casino, Daily Telegraph and supporters.

The GSC is required to report back to the Premier and Minister no later than 30 September. This timeline has prompted considerable concern, given the public has little over a fortnight to respond, with the GSC only releasing the terms of reference last week, i.e. the 30 August. Typically the public would have at least a minimum of 28 days, with typically at least 42 days to respond.

It is not understood if the IPC will consider the GSC's feedback. However maintaining the Independent Planning Commission's independence, and ensuring the assessment meets public expectations in terms of process and regulatory requirements, is paramount. To this end, there is widespread support for the Open Letter to the IPC opposing Star Casino's proposal, which was published in the Sydney Morning Herald on Monday, 26 August, 2019.

3. Key Concerns

a. Consideration of Public Space and Vistas

The proposal (albeit its form could long be argued in terms of the quality of its design) is out of context with the character of the area, and will unduly dominate local views and wider vistas.

If approved, it would see Star and Crown Casino complexes effectively act as a dual gateway to Sydney Harbour, able to be seen from the north, west, east and south by land, air and water.

For visitors arriving to Sydney via the harbour, the two Casino complexes would dominate Sydney's skyline and in particular, the views of Sydney's Opera House when viewed from the harbour.

While construction of Crown Sydney has long been contentious, its approval should not form the basis for a successful argument to approve the Star's application or extend the Darling Harbour precinct into the heart of Pyrmont.

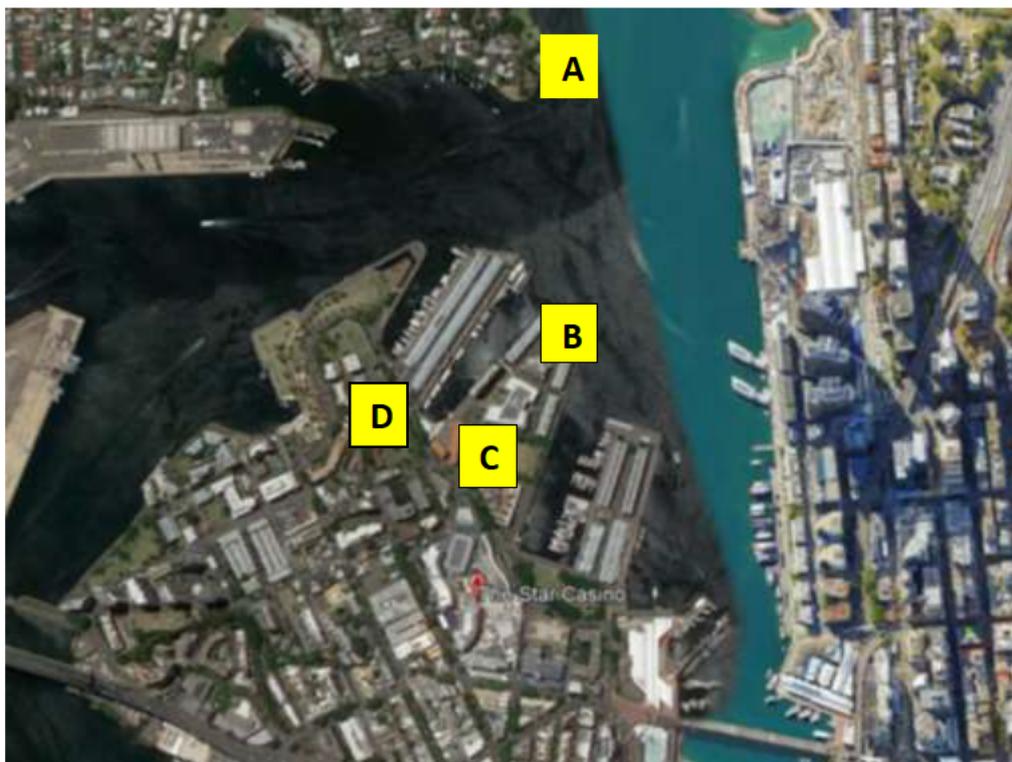
² https://gsc-public-1.s3.amazonaws.com/s3fs-public/the_hon_rob_stokes_mp_-_correspondence_to_the_chief_commissioner_of_the_gsc.pdf

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When making the presentation to the IPC, Urbis, as the applicant’s representative appeared to focus on the following public spaces, namely, Pyrmont Bay Park, Pyrmont Bridge, Union Square and the Clifftop Walk, with the Visual Impact reports concluding the impact was acceptable. This opinion differs largely to that voiced by many in the community.



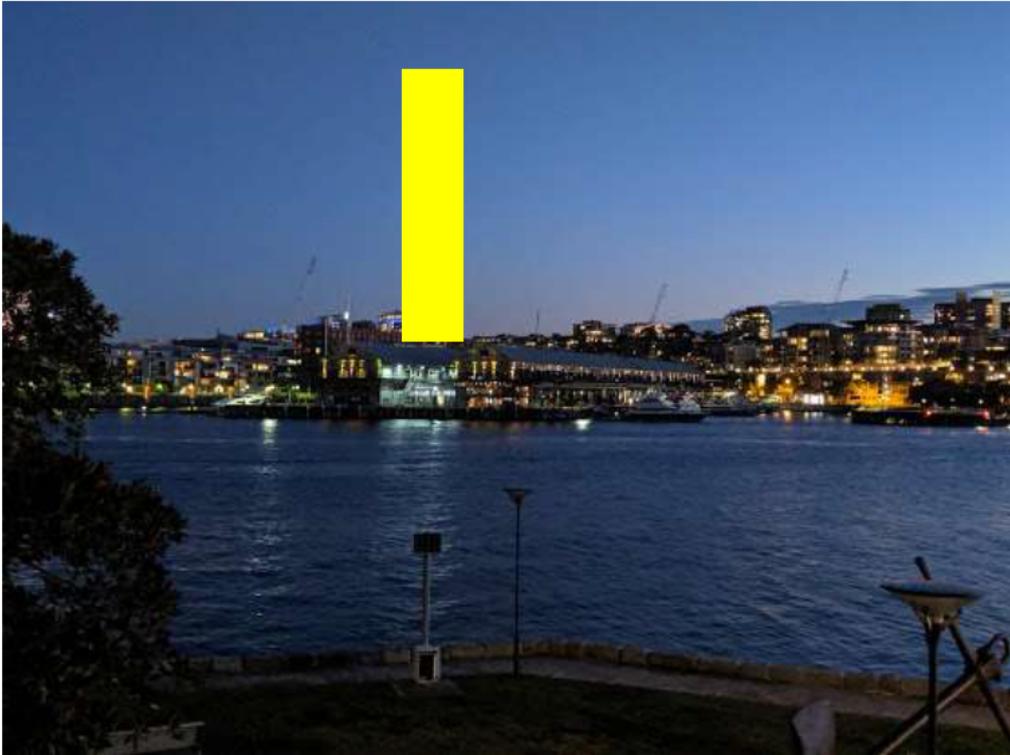
In particular, the proposal spoils views and the intimacy of the vista and settings, in location such as Illoura Reserve and Peacock Point at East Balmain (A), Ballaarat Park (B), Metcalfe Park (C) and James Watkinson Reserve (D), with the massing and scale having major implications for Pyrmont’s future, as well as Ultimo and Western Harbour Precinct to Broadway. Notably as a comparison, buildings along Broadway are relatively smaller, with height restrictions for Central Park (at 117m) reflecting aviation restrictions.



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Location shots follow, with an indicative illustration (only) of the visual impact:

View from East Balmain



View from Ballarat Park (Darling Island)



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View from Metcalfe Park (Darling Island)



View from James Watkinson Reserve (Pyrmont)



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b. Historical and Future Context

Following initial approval in 1994, in 2009, an application was approved under Part 3A, to incorporate a 10 storey hotel in addition to a podium. At the time, the proponent contended a maximum height of 66 metres should be applied, arguing it reflected the nature of the landmark development. The Department at the time considered that the local LEP height limit of 28 metres should apply, with the project subsequently approved after the height was reduced to 43 metres. This incorporated a substantive setback to 'reduce the visual dominance of the corner building'³.

A series of modifications subsequently followed to incorporate a number of changes. This includes Modification 14, which application was determined in 2017. These works relate to changes to Level B4 to Level 5 and are predominantly within the building envelope, whereas Modification 13 relates to the introduction of a 237 metre high rise hotel/residential tower, presumably, to rival Crown Casino. A neighbourhood community facility is proposed as part of the plans.

In the presentation to the IPC, Urbis, suggested the height of the application reflected the former Pyrmont Power Station, which then dominated the landscape, while Chris Johnson from the Urban Taskforce suggested a future vision for a high-rise precinct to rival the CBD justified the proposal (see images below).

These perspectives are generally inconsistent with that from local communities. They are also considered premature of any review by the GSC. Rather any substantive change should undergo a rigorous assessment process and proper and thorough community consultation.

Historic Context (Urbis)



Future Vision (UTF)



³ <https://maiorprojects.accelo.com/public/2f944025941c5a0d8ec1bfba61da0e2c/Director%20General's%20Report.pdf>

c. Community Centre

Significant concern has been expressed about the interface of a community centre within the casino, and the interplay with a large scale gaming facility. In addition, it appears the use of the centre will be used extensively for corporate and internal (Star Casino) use.

d. Impact on Local Infrastructure

In addition, there are significant concerns about the impact from the expansion of the retail and tourism facilities within the casino complex, and its corresponding impact on the local village centre on Harris Street, which to date has been able to retain its unique village feel and historic nature.



Likewise the impact on traffic, which is already facing considerable pressure, particularly, during peak hours and on weekends.

Conclusion

The application is considered an overdevelopment of the site, and not in the public interest.

██████████
6 September, 2019

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