

Bruce Hunter  
Pyrmont, NSW 2000  
April 11, 2021

To:

Independent Planning Commission  
Objection recommended consent to Harbourside Shopping Centre Redevelopment (SSD 7874)

Dear Independent Planning Commission:

I am writing objecting to the recommended consent to Harbourside Shopping Centre Redevelopment (SSD 7874).

While the Harbourside shopping center is in great need of refurbishment and there would be benefit from the additional public on the podium, believe that the NSW Department of Planning Industry and Environment has not adequately assessed the impact of the proposed residential tower that is part of the proposed redevelopment.

I have attached areas of impact that have not had due consideration and rationale of what the 166m high residential tower should not be approved.

Sincerely,

Bruce Hunter

## Challenged assessment conclusions

- “it provides a height, scale and density that is compatible with the existing and emerging character of Darling Harbour”
  - There are no other buildings of the tower’s height around the waterfront of Darling Harbour
  - In the Response to Submissions (TRS) the height was reduced to RL 153.75 abut increased again to RL 166.95
  - Oher building fronting Darling Harbour have lower heights and a further from the shoreline
    - Sofitel - 133m
    - Darling Park Towers – 130m
- “The site is located within the Eastern City District”
  - The location is actually on the western side of Darling Harbour
- ...”increase housing supply and choice with access to jobs, services and transport”
  - Pymont is already one of the densest residential areas in Australia and the apartments themselves are aimed at privileged owners and investor with only a notional contribution to affordable housing.
  - Transport in not improved by the development. On the converse this will increase traffic in the area that are poorly supported by the local area roads.
  - The residential tower will have little impact on the jobs in the area.
- “support the renewal and reinvigoration of Darling Harbour while protecting the District’s Heritage”
  - Districts heritage will be negatively impacted by the imposing height of the tower which reduces the visual heritage of some key historic areas in Pymont
- “Development precedent”
  - Concern was raised in public submissions that the proposed increase in building height may set a precedent for the development of other tall buildings within the locality.
  - The Department notes any development of surrounding land would be the subject of separate development applications assed on their merits.
  - The Department has assessed the merits and impacts of the proposal and does not consider the proposal would set a development precedent.”
    - The Department’s assessment contradicts this statement and conclusion. It’s consideration of the tower height raises the precedent set by Sofitel, Darling Park Towers, and Darling square. These are given as an example of existing towers. Note that these are 10 to 15m lower in height that the proposed tower and not as close to the shoreline.

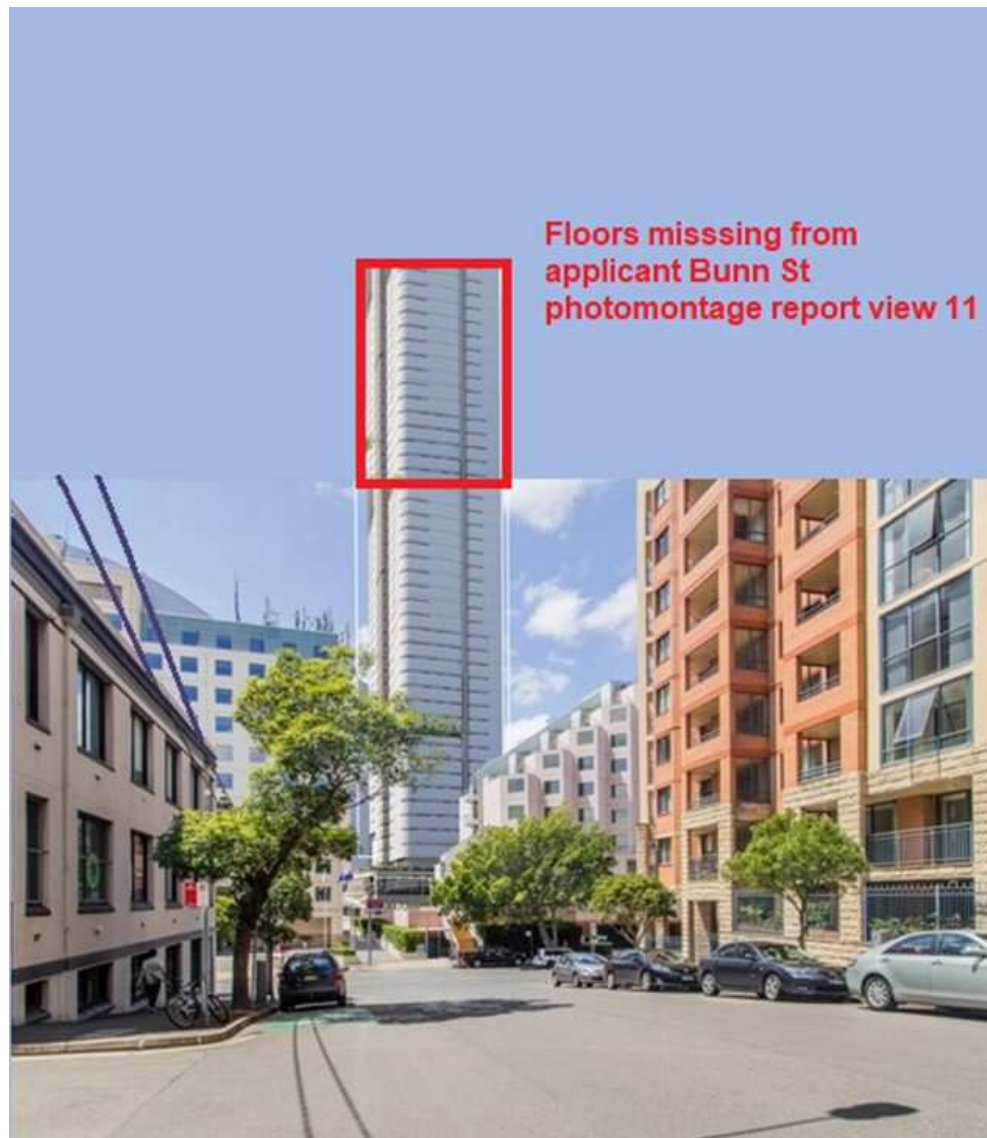
## 6.2 Land use

- “6.2.1 The DHDP seeks to encourage the development of a variety of tourist, recreational, entertainment, cultural and commercial facilities.”
  - Although residential use is permitted doesn't mean it should be allowed, especially considering the gross visual impact from Darling Harbour and residential and heritage areas of Pymont.
- “6.2.6 “...
  - the proposed residential tower results in acceptable built form, amenity and heritage impacts and traffic impacts”
    - I believe the build form (height and Position) is unacceptable considering the visual impact on the area.
  - “it the proposal, including residential uses ...prioritises employment generating”
    - A residential tower would not be employment generation beyond construction”
  - “... it prioritises employment generating floor space”
    - A residential tower would not be employment generating floor space
  - “the residential use ... will deliver significant public benefits”
    - A residential tower would not deliver significant public benefits

## 6.5 Building Envelope

- “6.5.5 Given the absence of planning controls to inform the proposal, the Department sought the advice of an independent expert to assist in its assessment of the application.
  - “Absence of planning controls does not mean absence of planning. The inclusion of 170m residential tower I believe is not good planning considering the impact on Darling Harbour and residential area of Pymont”
- Height, bulk and scale –Tower
  - The tower is setback 32m from the waterfront, 91m from One Darling Harbour, 50 m from the Novotel and Ibis hotels, 135 m from Pymont Bridge and 77 m from the Sofitel hotel. It is setback 12 m from the eastern (waterfront) extent of the podium
    - Set back does not reduce visual impact on neighboring quiet residential streets
  - “The Applicant submitted a Visual and View Loss Impact Assessment (VVIA) in support of the application and provided perspectives of the building envelope as seen from key vantage points as shown at Figure 13 to Figure 17”
    - Visual impact perspectives do not show the real extent of the tower height or its bulk

- The Bunn St figure is missing from this department's assessment. In the Appendix E of the proposal this did not show the full height of the tower but cut off at Novotel height. This gives a false impression of the visual impact. The following approximate representational picture show the full height which will obviously have a detrimental effect on quiet and heritage streetscapes. The proposal concludes that the overall Visual Impact is low! A great understatement!



Approximation of UNCROPPED tower height view in Bunn St Streetscape

- In the applicants Visual and View Loss Impact Assessment (VVIA) submission, key vantage points from heritage areas of Pyrmont were missed out. Like Bunn St, there is a striking impact on the streetscape in Union Square which is part of the registered Pyrmont Heritage Conservation Area with distant vistas. Currently there a now Darling Harbour buildings visible (Sofitel top flow is just visible at some spots above the Harlequin Hotel. The following approximation of missing view shows a major impact of the residential tower on the Union Square vista.



Approximation of visual impact of residential tower on Union Square

- “6.5.13 The Applicant contends the proposed height, bulk and scale of the tower ...it responds to the current and future built form character of Darling Harbour, is setback from Pyrmont Bridge, the waterfront and maximizes view sharing, solar access and outlook”
  - It does not respond to impact to character of Pyrmont streetscapes.

- “6.5.15 In order to thoroughly assess the appropriateness of the tower-built form, the Department has carefully considered the consistency with the surrounding character, the tower location, bulk and scale and visual impacts.”
  - The department has not considered the visual impact to Pyrmont streetscapes.
- “6.5.21 The Department acknowledges Council’s concern about the 53.2 m depth of the northern and southern elevations of tower, however, considers the bulk of the building envelope is appropriate”
  - The Department has not considered the impact of the tower on Pyrmont streetscapes
- “6.5.22 The Department has considered the visual impact of the proposal within the key vantage points... the VVIA has demonstrated that the proposal would not have an unacceptable visual impact when viewed from key vantage points on the opposite side of Darling Harbour, from Pyrmont Bridge or from more distant perspectives.”
  - The department has only considered the vantage points offered by the applicant on not the visual impacts on the historic backstreets of Pyrmont.
- “6.5.23 In conclusion, having carefully considered the proposal within the context of Cockle Bay and Darling Harbour and the expert design advice”
  - The Department has not considered the residential tower context of Pyrmont backstreets on which it will have a major impact due to its bulk and height.

## Heritage

- “6.5.78 The site does not contain any heritage items but is located adjacent to the State Heritage Listed Pyrmont Bridge to the north”
  - The Pyrmont Bridge may be the only obvious heritage item in the area but the Water Cooling System and Manifold that was part of the Ultimo Power Station listed under the Heritage Act - State Heritage Register number 02045, extends under the existing Harbourside Shopping Centre and foreshore. The impact of redevelopment should be assessed on the manifold.