



**ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000**

URBIS.COM.AU
Urbis Pty Ltd
ABN 50 105 256 228

16 October 2019

Ms Dianne Leeson
Panel Chair
Independent Planning Commission NSW
Level 3, 201 Elizabeth Street,
Sydney NSW 2001

Dear Ms Leeson,

MP 08_0098 (MODIFICATION 13) – RESPONSE TO THE GREATER SYDNEY COMMISSIONS FINDINGS ON THE PYRMONT PLANNING REVIEW

We write on behalf of the Star Entertainment Group Limited (**SEGL**) in relation to the Greater Sydney Commission's (**GSC**) 'Review of the Planning Framework for the Western Harbour Precinct including the Pyrmont Peninsula' (**the Review**). The Review sought by the Minister for Planning and Public Spaces (**the Minister**) asked the GSC to:

“Conduct an independent review of the planning framework for the Western Harbour precinct, including the Pyrmont Peninsula, and to prepare a report on the outcome...”

The area under review extended from the Pyrmont Peninsula in the north, to Broadway in the south, east to Darling Harbour and the Goods Line, and west to Wentworth Park (**the Review Area**). The Review Area included SEGL's integrated Star Casino and Resort complex (**The Star**) which is the subject of Modification 13 to Major Project MP08_0098 (**Mod 13**) presently before the Independent Planning Commission (**IPC**) for determination.

The IPC has invited written submissions in response to the GSC's ten findings and three recommendations. This correspondence provides SEGL's response to the GSC findings and presenting The Star's significant current, ongoing and potential future social and economic contribution to the Review Area, Sydney and greater New South Wales (**NSW**).

The GSC report on the *Western Harbour Precinct including the Pyrmont Peninsula - Planning Framework Review Report* (**the Review**) identifies (page 2) that:

*“The NSW Government's strategic vision for the Western Harbour Precinct and Pyrmont Peninsula is articulated as an emerging **Innovation Corridor that is part of a strong and competitive Harbour CBD** in the Eastern Economic Corridor in the Greater Sydney Region Plan - A Metropolis of Three Cities. The Eastern City District Plan (**ECDP**) sets out planning priorities and actions to deliver the Region Plan and promotes the attraction and development of innovation activities in the Corridor to enhance **Greater Sydney's global competitiveness**”* (emphasis added).



This submission:

- maintains that the strategic context of Mod 13 is justified, as established in the application before the IPC and in prior correspondence to the IPC;
- highlight's how the approval and undertaking of the Mod 13 works will contribute to the GSC's vision for the Harbour CBD, the Innovation Corridor and the Darling Harbour Precinct (as set out in *the Greater Sydney Region Plan – A Metropolis of Three Cities and priorities of the Eastern City District Plan*) in continuing "to build a more diverse and competitive offering" in the sectors of "Cultural, entertainment, arts and leisure activities" in entertainment precincts such as Darling Harbour (Eastern City District Plan (**ECDP**), page 59); and
- details how Mod 13 assists in delivering the Government's vision "for a vibrant mixed-use precinct in proximity to the global Sydney CBD, including the objectives of the Greater Sydney Region Plan – A Metropolis of Three Cities and priorities of the Eastern City District Plan" (the Review, page 1).

THE STAR'S CONTRIBUTION TO THE REVIEW AREA

The Review at page 19 states that:

"As the character of the Review Area has grown and changed over the last 20 years, its diversity has also increased. This has become an important economic cluster, tourism destination and residential community on the fringe of the Harbour CBD".

The Star is a significant contributor to the growth and change of the Review Area. It is a market leader in tourism, hospitality, food and beverage and the entertainment industry. The Star's past, current and planned future contribution to the Review Area is significant and includes:

- **Past** ~ The Star was a catalyst in the renewal of Pyrmont during the mid-1990's which saw a shift towards tourism, commercial and residential development and urban renewal, away from Pyrmont's industrial past. The Star sits on the site of the former Pyrmont power station, which commenced operations in 1904, was decommissioned in 1983, and remained derelict for almost a decade until development commenced for Sydney's first casino.
- **Present** ~ The Star's current and ongoing contribution to NSW, the Harbour CBD, the Innovation Corridor and the Darling Harbour Precinct is demonstrated by the following economic metrics:
 - as one of the largest private sector single-site employers in NSW The Star employs more than 4,500 staff – **it is the largest private sector single-site employer in the Review Area;**
 - as one of the largest single land holdings in the Harbour CBD, it exceeds the size of Quay Quarter and numerous city blocks - **it is the largest single land holding in the Review Area;**
 - More than 11 million people visit The Star annually with approximately 48,000 attending on a typical Saturday night - **It is a significant tourist attraction, a destination for locals, domestic and international tourists, a dining, entertainment and cultural hub in the Review Area;**
 - The following numbers represent an average Saturday night operation:
 - 614 hotel rooms - 1,400 pax

- Total restaurant covers – 10,000 pax
 - Event Centre - 800 pax for banquets and 4,000-max capacity for shows
 - Lyric Theatre show – 2,000 pax
 - Cars parked - 3,500 vehicles
 - Team Members (Full time equivalent (FTE):
 - Food and Beverage (F&B) – 785
 - Gaming - 950
 - Security - 130
 - Other – 530
- Total team members (rostered on a Saturday night) – 2,395
- The Star is a significant contributor to the NSW visitor and tourism economy The Star attracted approximately 11.6 million people in the last financial year, compared to the Fish Markets which were identified in the Review to have attracted three million people in 2015 (the Review, page 6) – **The Star attracts four times the number of visitors annually compared to the Fish Markets in the Review Area;**
 - It is a supporter of the training and education of career hospitality professionals. In the 2018 financial year, The Star contributed \$6.8 million to **educating, training and upskilling hospitality workers in the Review Area. This further enhances their hospitality expertise and provides career pathway opportunities;** and
 - The Darling Hotel is Sydney’s only Forbes 5-star rated hotel and one of only two in Australia – **it is the only Forbes 5-star rated hotel in the Review Area, the Darling Harbour Precinct and the Harbour CBD.**
 - **Future** ~ The Star’s potential contribution to the GSC’s vision for the Harbour CBD, the Innovation Corridor and the Darling Harbour Precinct through the approval of Mod 13 would continue the established trajectory of being a major economic contributor, destination for tourism and leisure activities and will assist the GSC releasing the vision to build “*a more diverse and competitive offering...*” (ECDP, page 59), including:
 - Enhancing Sydney’s reputation and **the Harbour CBD as a global tourism destination** through the return of the Ritz-Carlton brand to NSW and the provision of an additional 220 hotel rooms in the proposed 6-star hotel;
 - Making a significant **contribution to the provision of social infrastructure** in the Review Area, through the construction, fit-out, funding, management and maintenance of the 5-level Neighbourhood Centre on site to the year 2093 being the period of the lease remaining on the site. This represents a net community benefit equating to approximately \$80M in today’s value excluding construction and fit out;
 - **The creation of additional local employment opportunities** with an extra 754 FTE jobs on from FY2017 to FY2030 and up to 1,000 roles during the peak construction period;

- Deliver material and **broader benefits for the NSW economy and tourism**, through provision of accommodation in the Darling Harbour Precinct of the Harbour CBD;
- The continued contribution to diversity in **housing options, a range of cultural, entertainment and leisure activities, including strong night-time activities supporting the re-emergence of the night-time economy in Sydney**; and
- The creation of **\$800 million incremental increase in gross State product** to NSW to FY2030 (PWC, 2017, Economic Impact Assessment, (Environmental Assessment Report (EAR), Appendix L)).

COMMENTS ON THE REVIEW

The following items are highlighted for the IPC's further consideration in the determination of the Mod 13 application:

1. Review timeframe

The timeframe of six weeks was limited and did not allow the GSC to undertake a robust assessment of the intricacies of the current development standards and controls at a fine grained level – this is confirmed at page 3 of the Review; *“The time frame for undertaking the review has meant there has been a strategic focus on issues. It does not relate to, or comment on, any individual development application or planning proposal”*. The GSC is commended on their efficient turnaround, however with reference to the GSC's three recommendations, additional work is needed to achieve alignment with the GSC's vision.

2. Terms of reference

The Review does not respond effectively to the Minister's Terms of Reference, specifically to:

“undertake an assessment of the efficacy and appropriateness of current development standards and controls to deliver the Government's vision for a vibrant mixed-use precinct in proximity to the global Sydney CBD, including the objectives of the Greater Sydney Region Plan – A Metropolis of Three Cities and priorities of the Eastern City District Plan”.

The findings and recommendations of the Review outline that the planning process is increasingly complex, however an assessment of the development standards and controls is absent in the Review. The findings are based on the feedback from stakeholder engagement rather than an independent assessment of the standards and controls and whether or not these are appropriate. It is agreed that the timeframe for GSC to complete the Review was limited (as stated at page 3 of the Review) however, this should not create delay in the timing for positive determination of the Mod 13 application by the IPC.

The planning framework applying to the Review Area and Mod 13 is complex. It reflects an inability of the local planning controls to keep pace with the evolving character of the Review Area including the current and emerging focus on and investment in tourism, entertainment and leisure activities in the Darling Harbour Precinct at The Star and the Bays Precinct and at The Sydney Fish Markets. The Star and other significant developments have had to utilise other planning pathways which recognise their State significance as acknowledged at pages 12, 13 and 14 of the Review.

3. The Star as a major employer

The Review fails to identify or acknowledge The Star as a Major Employer in the Review Area instead relying on generic survey data published by the City of Sydney Council:

“Major employers in the Review Area include: UTS, TAFE, ABC, Global Switch, Accenture, Google, Reuters, Television and Radio stations (Channel 7, Channel 10, Nova, 2SM, ABC, Macquarie Radio), Fairfax, CGU, John Holland, American Express and IBM” (the Review, page 6)

The Star is the largest private sector single site employer in the Review Area, employing more than 4,500 staff. Failure to acknowledge this fact is an oversight in the Review. Table 4.1 (FES 2017, *Total employment by city-based industry sector by village*) identifies in 2017 there were 4,894 jobs in the Harris Street Village meaning that The Star on current survey FTE figures would account for 91.9% of this employment in a single site.

A review of the City of Sydney *Employee Survey Report* identifies The Star as an employment site for the purpose of the survey, as seen in the extracted figure below.

Figure 1 – City of Sydney Employment Figures



Source: City of Sydney

A review of the survey metrics behind the Study indicates that the Harris Street Village in which The Star sits (for the purpose of this survey), saw a 5.6% reduction in employment between 2007 and

2017. Mod 13 presents the opportunity to reverse this trend and deliver economic stimulus to the Harbour CBD and the NSW economy.

Table 6.1 FES 2017, *Total Employment by space use division by village* and Table 6.2 FES 2012 *Total Employment by space use division by village* identify that in the Harris Street Village in which The Star is located for the purpose of the Employment Survey shows that:

- In 2017 there were 35 jobs in Visitor Accommodation compared to 83 in 2012; and
- In 2017 there were 3,586 jobs in Entertainment/Leisure compared to 3,139 in 2012.

If it is assumed that all jobs at The Star account for all of the Visitor Accommodation and all of the Entertainment/Leisure jobs, there is still an underestimation of the contribution made by The Star to the overall employment figures in The City of Sydney LGA.

This underestimation is further emphasised in Table 8.1 FES 2017, *Work space ratio for business floor space by city based industry sector by village* which identifies that for *Tourist, Culture and Leisure* combined there is 68.8sqm of floor space per worker. At The Star, the ratio is 4,500 jobs accommodated in a GFA of 140,200sqm being 31.15sqm of floor space per worker. This confirms the density of employment delivered by The Star.

The breadth of the employment contribution by The Star to the Review Area is further evident on review of the Deloitte Report *The Economic and social impact of the Sydney Fish Markets*, referenced in the Review, when compared to the Sydney Fish Markets which has:

- a total economic contribution of “about \$21 million in value added to NSW GSP, and around 137 FTE jobs in 2014-15”;
- “Direct employment” of “56.5 FTE” (Table 2.1, page 18);
- Indirect employment is “around 81 FTE jobs” (Table 2.2, page 19).

The Star employs 4,500 people. This fact has not been adequately represented in the Review.

In considering the GSC findings and recommendations the IPC should interrogate existing employment data to fully appreciate The Star’s contribution to the Review Area, the Harbour CBD and NSW, and the potential future social and economic contribution that Mod 13 would deliver.

Mod 13 presents an opportunity to bolster the current contribution to the NSW economy and jobs. It will deliver an additional 754 incremental FTE jobs in NSW through construction and operation of the various elements (hotel, food and beverage, construction, etc).

4. The Star’s contribution to the tourism sector

The Review does not acknowledge The Star as one of the businesses in “*the tourism sector*” as being “*a major employer and visitor attraction in the Review Area...*”, albeit it lists the Sydney Fish Markets and Powerhouse Museum (GSC, the Review, page 6).

In terms of visitor attraction, The Fish Markets were stated to attract three million people in 2015 (GSC, the Review, page 6), whereas The Star attracted 11.6 million people in the last financial year.

The Star's support in the training and education of career hospitality professionals further demonstrates this contribution to the tourism sector. The Star's commitment to educating, training and upskilling hospitality workers provides career pathway opportunities, contributing to the growth of talent in the NSW tourism sector.

The IPC, in its determination of Mod 13, should have regard to the important contribution The Star currently makes as a major employer and significant contributor to the tourism sector and how this will be expanded through the delivery of Mod 13. The economic benefits are detailed in the Economic Impact Assessment Appendix L to the EAR submitted with Mod 13. The GSC does not illustrate the significance of The Star as the largest contributor to the tourism sector in the Review Area.

5. The Star's contribution to social infrastructure and open space

The Review states that:

"The demand for community services, facilities and public open space in the Review Area are increasing and expected to continue to increase in the future...The Eastern City District Plan recognises the importance of accessible and culturally-appropriate social infrastructure to serve a changing population, encourage creative and cultural expression and support social connections".

The construction, funding and management of the proposed Neighbourhood Centre in Mod 13, can help address the deficit outlined in the ECDP and identified in submissions by The City of Sydney.

Given the urbanised nature of the Review Area, the potential for large playing fields and swimming pools is restricted by a general lack of land and the value of land in the Review Area. Opportunities remain however for embellishment of existing waterfront parks and open space in the Review Area. Mod 13 would contribute \$5.7M in Section 7.11 contributions for the City of Sydney to utilise for upgrading existing or acquiring additional public open space.

The IPC should consider the potential future contribution of Mod 13 to deliver additional social infrastructure and the potential for existing open space to be embellished and deliver improved functionality and experience.

6. The Star's contribution to visitor accommodation

The Review does not include a discussion regarding visitor accommodation needs despite recognition of the importance of the tourism industry in the Harbour CBD and its highlighted importance to future economic growth. Tourism/leisure is recognised as a key economic activity and a major employer for the Review Area (the Review, Table 2, page 16). Data is provided on annual visitor numbers to specific sites in the Review Area, however no discussion is provided regarding visitor accommodation needs to support the growth resilience of this sector.

Mod 13 will contribute to visitor accommodation needs, contributing to the tourism sector, in the absence of a single planning framework which defines parameters for its delivery. This has already been demonstrated in the past through the progressive development of The Star using available planning pathways to enable visitor accommodation such as The Star Grand Residences (formerly the Astral Towers), The Star Grand Hotel (formerly the Astral Hotel) and The 5-Star Darling Hotel - all delivered in response to a latent demand for visitor accommodation in the Harbour CBD. The IPC should consider this in the context of the identified growth areas and targets of the *Visitor Economy Industry Action Plan 2030*, prepared by the NSW Government (August 2018) which seeks to:

“more than triple the 2009 overnight visitor expenditure amount by 2030, aiming to achieve \$45 billion by 2025 and \$55 billion by 2030” (page 2).

Mod 13 responds to this highlighted demand in the *Visitor Economy Industry Action Plan 2030* in the provision of overnight tourist accommodation.

Anecdotal evidence of the need for additional visitor accommodation in the Review Area was highlighted by Paul Rigby from Foundation Theatres (operator of the Sydney Lyric theatre) at the IPC Public Meeting, 27 August 2019;

“We sell over 1.1 million tickets a year to our shows, and we’re a tourist and entertainment destination for adults, families and school groups. Our patrons come not only from Sydney but also from outlying areas of NSW as well as other parts of Australia and overseas. In an average year, 150,000 of our patrons must stay in Sydney overnight.

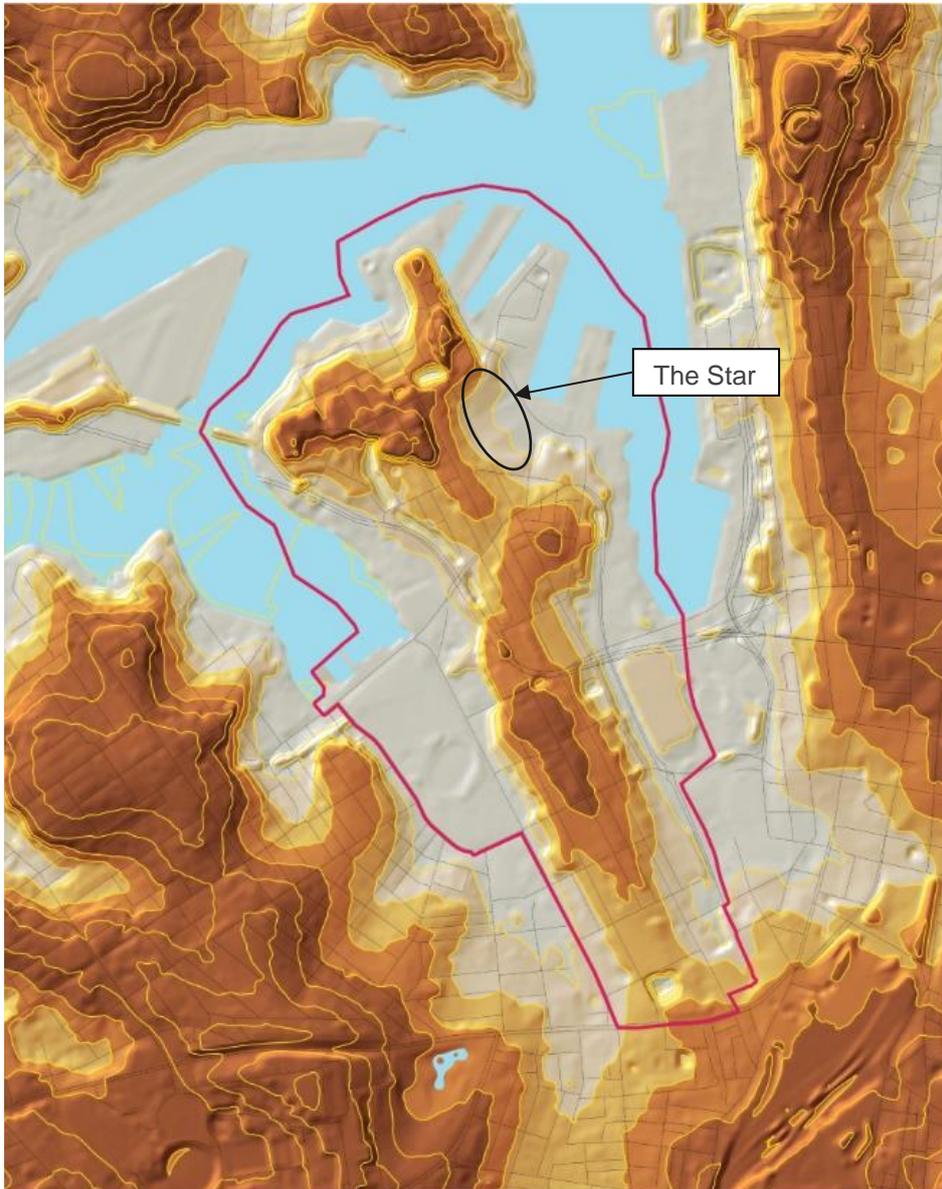
“To develop and grow the theatre industry in Sydney, it’s crucial for us to continue and develop and drive that overnight visitation. Visitors to Sydney who are here to see a show or who – who choose to see a show while they are here, like to have hotel accommodation in close proximity.”

7. The Star’s unique topographic location

The Review highlights the unique context of The Star site, with reference to topography. *Map 2* of the Review confirms the findings of the Urbis Urban Context Review lodged with Mod 13, that the local topography as it exists today is characterised by a central raised ridgeline that runs generally along the alignment of Harris Street. Around the perimeter of the Pyrmont Peninsula, immediately to the north of the Site, there is clear demarcation between the waterfront and the higher land as denoted by sandstone cliffs. At The Star, the change in levels is accommodated within the built form while the adjoining streets provide a more gradual transition from the ridgeline to the waterfront (refer **Figure 1**). This context establishes The Star Site as being a natural transition between the waterfront (Darling Harbour) and the ridgeline (Pyrmont) (Urban Context Report - page 51 figure 41). The Urban Context Report found that The Star’s context was consistent with the Darling Harbour waterfront and different to the residential parts of the Peninsula (Refer to Urban Context Report - page 39, figure 31).

Map 2 (Figure 2 below) delineates the vast differences in topographic context between the Harris Street Village and that of The Star in Darling Harbour. This distinction is important to highlight for the IPC’s further consideration when understanding the Strategic Context of the site, as previously described to the IPC in the suite of documents lodged by SEGL with Mod 13.

Figure 2 – Topography of the Review Area (Map 2)



Source: Map 2 - GSC

8. The City of Sydney's Development Capacity Study 2019

The Review references the City of Sydney's *Development Capacity Study, 2019*. This Study identified development capacity across a range of land use zones in a portion of the Review Area. The Review states:

“The City of Sydney’s capacity analysis shows that while a large part of the Review Area has been realised under current planning controls (Harris Street Village Precinct) there is capacity for additional housing and/or jobs across more than 20 sites” (the Review, page 23).

Map 6 highlights the location of these sites:

Figure 3 – Potential Capacity (Map 6)



Map 6: Key locations and sites with potential capacity



Source: Map 6 - GSC

The mapping referenced in the Review (Map 6) excludes reference to any potential development capacity on “NSW Government controlled sites” such as Mod 13. The Capacity Study references that capacity exists on these larger sites however, does not go in to further detail. The GSC does not depict the potential capacity of large sites in Map 6 and this lack of representation highlights a deficiency in representing development potential in the Review Area.

The site on which The Star is located has the capacity to deliver further economic growth and development with limited additional environmental impact as demonstrated in the material submitted with Mod 13. This potential should be duly recognised.

9. Significant projects planned and underway

The Review acknowledges that there are a number of significant projects in the Review Area which are planned and underway (the Review, page 3, 12 and 22). Acknowledgement of the scale of these projects is noted by the GSC:

“Several of these projects have already met the threshold for State Significant Development, recognising their size, economic value or potential impacts”.

Mod 13 is a development of State significance. The Star City redevelopment was declared a Major Project in 2008 under section 75B(2)(a) (of Part 3A) of the Environmental Planning and Assessment Act 1979. A development that is declared under section 75B(2)(a) is one that, in the opinion of the Minister, is of State or regional environmental planning significance. The existing development (incorporating 13 approved modifications to Major Project MP08_0098) and the current Mod 13 application constitute development of State significance.

The Review also confirms that these State significant projects “*may be progressed under the relevant planning pathway*”;

“These projects are at various stages of the planning process, including assessment stage, planning stage and strategy stage and may be progressed under the relevant planning pathway”.

The Review does not restrict the ability of the IPC to progress the determination of Mod 13 as a development of State significance.

RESPONSE TO THE REVIEW RECOMMENDATIONS

Three recommendations were provided by the GSC as part of the Review. For each recommendation, the contribution of Mod 13 in assisting to achieve the recommendation is provided for consideration of the IPC:

Recommendation 1: Alignment with the Greater Sydney Region Plan and ECDP Plan. This includes specific reference to the “Innovation Corridor’s role of the Review Area set out in Planning Priority E - Growing a Stronger and More Competitive Harbour CBD” (the Review, page 25).

Mod 13 aligns with the Greater Sydney Region Plan and ECDP and will assist in the growth of a more competitive Harbour CBD because:

- The success of the Harbour CBD is underpinned by a package of competitive advantages including *'its existing and growing entertainment, cultural, tourist and conference assets'*. Mod 13 includes improvements to the existing entertainment, cultural and tourist hub established at The Star.
- The ECDP identifies that the *'growth of the Harbour CBD must be enabled for the region to remain competitive'* (ECDP page 57). Mod 13 continues the trajectory of continual renewal and improvement at The Star established in the mid 1990's. These improvements will assist in the Harbour CBD's global competitiveness.
- The Innovation Corridor (ECDP figure 16 page 60) contains knowledge intensive, creative and start-up industries along with health, education and research services that support the global competitiveness of the Harbour CBD. The Star site provides entertainment, conference and cultural facilities to contribute to the Harbour CBD's attractiveness to international talent. Ongoing investment in major entertainment precincts such as Darling Harbour and renewal of The Star site, will assist in building a more diverse and competitive offering in these sectors (ECDP page 59).
- The Darling Harbour Precinct in which the site is located, is identified as a *'major entertainment precinct'*. The ECDP identifies *'Cultural, entertainment, arts and leisure activities must continue to be provided to build a more diverse and competitive offering in these sectors.'* Mod 13 provides a destination for tourism, conferences, entertainment and culture (ECDP page 50).
- The Review also notes that; *"Enhancing liveability and enabling diversity among contributors to innovation is a key element of successful Innovation Corridors"*. The ECDP *"recognises the importance of accessible and culturally-appropriate social infrastructure to serve a changing population, encourage creative and cultural expression and support social connections"*. The Neighbourhood Centre provided in Mod 13 support this aim of the ECDP.

Mod 13 is consistent with the aim of the GSC's Recommendation 1. The approval of Mod 13 by the IPC would result in the realisation of cumulative benefits for the Harbour CBD and the enforce the Innovation Corridor's role.

Recommendation 2: Develop a Place Strategy (planning framework, master plan, economic strategy and governance). This includes specific reference to the development of a "Place Strategy for the Western Harbour Precinct" (the Review, page 25) which considers the individual character and potential of sub-precincts.

A suite of technical investigations, detailed analysis and reporting was undertaken in the preparation of the Mod 13 application. A number of these documents provide detailed background information which would support the future development of a Place Strategy for the Western Harbour Precinct, including:

- The Heritage Impact Assessment (EAR, Appendix P);
- Contextual Analysis (RtS, Appendix O);
- Urban Context Report (RtS, Appendix N); and
- Economic Impact Assessment (EAR, Appendix L).

These documents should form the subject of further investigation should the Place Strategy be pursued as they provide integral background information to portions of the Review Area. It is noted

that specific reference is made in the Review to the Economic Impact Assessment for the Sydney Fish Markets and that the potential economic contribution of Mod 13 in the above referenced EIA should also be considered by the GSC.

With specific regard to “Place” and local character, the Urban Context Report (RtS, Appendix N) and section 3.1.2 Character and Built Form of SEGL’s Response to the Department’s Assessment Report, outlines SEGL’s thorough approach to understanding place and context, including analysis against:

- Four scales of context;
- Three timescales; and
- Six themes.

The methodology applied in the Urban Context Report considered factors such as economics as part of the place and character assessment. The approach was noted as being generally consistent with the elements of the *Local Character Wheel* identified in the *Local Character and Place Guideline* prepared by the Department of Planning, Industry and Environment, February 2019.

Mod 13 has considered the concept of “Place”, provided a suite of documents which analyse the site’s context with regard to “Place” and in the absence of a defined Place Strategy, has provided an extensive account on how the proposal responds to the complexities of the context in which it is located. This includes identification of different character areas and sub-precincts through the analysis of different themes including economic role and function and land use, built form grain, massing and scale, wayfinding and movement and topography and landform.

Mod 13 is consistent with the aim of the GSC’s Recommendation 2. The approval of Mod 13 by the IPC would not preclude the achievement of GSC’s Recommendation to develop a Place Strategy.

Recommendation 3: Implementation of the Place Strategy.

The Review confirms that State significant projects such as Mod 13 “*may be progressed under the relevant planning pathway*” (page 12), notwithstanding the findings and recommendations of the GSC. Mod 13 is recognised as a development of State significance because of its economic and social contribution to NSW.

With reference to “Place”, the Mod 13 application considered the different character areas and sub-precincts in the Review Area. Analysis was provided on the different themes which make up the concept of “Place” including economic role and function, land use, physical features such as built form grain, massing and scale, topography and landform. This analysis was undertaken across timescales considering past, present and future, and how “Place” will continue to evolve and change. Any future preparation and implementation of a Place Strategy should incorporate these findings, specifically that regarding:

- the definition of individual character and potential of sub-precincts within the Review Area; and
- the distinction between the many “Places” of the Review Area, most notably, the distinction between the Harris Street Village and that of the Darling Harbour Precinct in which The Star is located, as defined by the Review Area’s unique typography (**Figure 2**).

Mod 13 is consistent with the aim of the GSC’s Recommendation 3 and the Review does not restrict the ability of the IPC to progress the determination of Mod 13 as a development of State significance.



SEGL supports the implementation of a future Place Strategy for the Review Area. The timing for implementation of this strategy should not impact the timing for determination of Mod 13 by the IPC.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Clare Brown". The signature is fluid and cursive.

Clare Brown
Director