

**From:** [REDACTED]  
**To:** [IPCN Enquiries Mailbox](#)  
**Subject:** Star Casino Redevelopment (MP08\_0098 MOD 13) - Review of the Independent Assessment and Design Advice  
**Date:** Thursday, 26 September 2019 3:51:39 PM

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Ms Anna Summerhayes  
Acting Executive Director - Secretariat  
Independent Planning Commission of N.S.W.

[REDACTED]  
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Dear Anna

I am an architect with over 35 years experience working in the Sydney area and I have lived in Sydney all my life. I have a keen interest in the future development and making of Sydney and closely follow most proposals for major developments.

I have been following the progress of the Planning Proposal for the Star Casino Redevelopment and have read numerous submissions, including the peer review of the Visual Impact Assessment material prepared and submitted by Yvonne Von Hartel AM. I have also read the assessment and design advice prepared by Professor Webber and an Urban Context Report by Russell Olsson.

My comments follow the format presented by Von Hartel.

#### BUILT FORM

Firstly, I concur with the view of many others that the Star Casino proposal for a tower that is 233 metres high (above Pirrama Rd) is completely inappropriate for Pyrmont and cannot be supported on numerous grounds. Amongst these grounds are that the tower exceeds the planning controls over the site by a factor of 8 and its resultant visual impact from numerous parts of Sydney.

The actual design of the proposed tower becomes of little relevance because the first issue (excessive height) is of such magnitude that no design, no matter how elegant or iconic, could ever overcome this point.

Setting aside the excessive height issue, unlike Von Hartel, I don't have an issue with the tower slimming down towards the base. Although non traditional in form, this type of design might be appropriate in the Sydney CBD, but completely inappropriate in Pyrmont.

I agree with Von Hartel that the likening of the tower as a landmark development similar to the Shard in London, is misguided and incorrect. The proposed Star Casino tower would stand alone in a low rise streetscape, quite unlike the Shard and its context.

#### CONTEXT

As stated by Professor Webber, the character of North Pyrmont is summed up - 'new buildings have been required to respect the heights and forms of neighbouring structures.....there are no very tall 'tower' buildings in this part of Pyrmont'.

In contrast the western side of the bay, north of Harbourside is bereft of towers - and demonstrates a low rise dense character and a mix of large and smaller developed sites and as Professor Webber summarises 'there are no very tall 'tower' buildings in this part of Pyrmont'.

I agree that North Pyrmont is quite different to Darling Harbour and Cockle Bay in that there are no tall towers, so the Star Casino proposal would be a stand alone tower.

#### VISUAL IMPACT

I agree with Professor Webber and Von Hartel that they consider that the tower would be unduly prominent, unrelated to its context and unacceptable. which in turn means that the adverse effect of the visual impact of the proposed development is unacceptable. I agree that the substantial visual bulk of the very tall tower against the sky would be oppressive from many viewpoints.

I agree with Professor Webber and Von Hartel that the visual impact of the proposed tower is extreme and that it would be a single oppressive element that divides the sky area into two parts - east and west of the tower. This outcome would be undesirable and would never be overcome over time. Blues Point Tower comes to mind of a similar (although much smaller) divisive tower element. The affected public views listed by Professor Webber are numerous but not all encompassing. Although various parks and public places have been listed, there are countless other places that would have an adverse visual impact caused by the proposed tower. These places include multiple places around the edge of Sydney Harbour where existing views of Pymont would be detrimentally changed.

In addition, the private views of tens of thousands of residents would be adversely affected by the proposed tower.

#### SYMBOLIC ISSUES

I agree with Von Hartel that the tower form alone does not convey that there is a casino below. Only prominent visual branding/signage would convey this message.

#### PUBLIC BENEFIT

I agree with Professor Webber and Von Hartel that there is very little public benefit assigned to the proposed development. The lack of streetscape activation and precious little public open space means that the public benefit is negligible.

#### URBAN CONTEXT REPORT PREPARED BY OLSSON & ASSOCIATES

Von Hartel peer reviews other reports besides the Webber report. One in particular is the Urban Context Report by Russell Olsson. Olsson argues that the NSW Planning Department's opposition to the proposal is a direct result of the failure to consider the development as part of the Darling Harbour Precinct. Von Hartel argues that this is not a valid approach as the existing planning controls apply to the proposed development's location in Pymont.

Von Hartel's position is that Olsson is wrong in considering North Pymont as part of the Darling Harbour Precinct and any reasonable urban planner would agree with her view. The Olsson view is wrong on many counts, primarily because the two areas are distinct geographically and in an urban sense. Von Hartel states that the Olsson view is questionable but she does not go far enough. In my opinion, the Olsson view is poorly analysed, disingenuous and simply serves to support an appalling over development which has no place in Pymont.

#### CONCLUSION

In summary, I generally agree with Von Hartel's conclusion that Professor Webber's report is a very concise and economical summary and commentary on the Application. Von Hartel suggests that Webber's report could have gone further and been stronger had he expanded his rationale and further questioned the view assessment criteria and evaluation presented by Architectus. I agree with this sentiment.

I also agree with her assessment of the Olsson Report but I would go further and add that his view is opposed to the opinion of almost all architects and planners in Sydney.

I think it's of utmost importance that the Star Casino proposal is rejected and the desired character of Pymont is maintained for future generations.

Yours faithfully

Nicholas Solomon B Sc(Arch) B Arch

Nicholas Solomon



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