
From: [REDACTED]
Sent: Tuesday, 18 May 2021 9:11 PM
To: IPCN Enquiries Mailbox
Subject: Harbourside Shopping Centre Redevelopment, Darling Harbour (SSD 7874)

Dear IPC Commissioners

thank you for your well-placed concern about amenity including overshadowing, foreshore access and view impacts at Harbourside.

It is hugely disappointing that the applicant's disregard for these crucial issues was obvious from the start, and hasn't changed.

Indeed, and incredibly, it neglected to include the required public space in its final submission last year. This was a major oversight that was highlighted by the City of Sydney.

And yet, the applicant in its latest submission to the IPC, stresses that it has "invested 4.5 years to collaboratively and sensitively develop its Concept Proposal".

We have yet to find anyone who would agree that the applicant has "collaboratively" and "sensitively" developed its proposal.

In fact, the applicant's plans aim to take away from the public and give to its bottom line - even its latest 'amended' proposal does little that can be defined as concession to the public good.

The applicant's plans still contain a major reduction in food and shopping outlets that, along with the location, are the major international and local drawcards.

The applicant wants to get rid of **60%** of the current amenities. That is, from the 20,000sqm to 8,000sqm.

It wants to replace that (and more, which it wants to gain by building much higher) with office space.

The IPCs request for a plan to reduce the office space and lower the height of Harbourside to an RL of 11.8 from the historically significant Pymont Bridge, is very reasonable and already has a precedent - the now-approved Cockle Bay redevelopment, where the applicant OFFERED the lower height.

This respects the Pymont Bridge's significance and protects it, while being crucial in allowing it to remain the historic drawcard it is and should remain as.

It must also be taken into account, that the Cockle Bay side of the Harbour is more amenable to a bigger development, as it backs on to the CBD and does not obstruct residential buildings.

In potentially "losing" office space which the applicant was never, and still isn't entitled to, and which has never been an acceptable use of the public land at Darling Harbour, the applicant says:

"A loss of more than 16,000sqm (40%) of employment generating floor space (loss of more than 2,500 jobs)."

The applicant needs to explain HOW office space creates jobs, and HOW it plans to build "employment generating floor space".

If the applicant shares that, it might help to end unemployment forever. We're waiting.

The applicant says a reduction in its plan will cause:

“A loss of more than 30% of residential floor space (loss of more than 100 homes)”

You can't lose something that's never existed.

The applicant now also claims that reducing its envelope will make the redevelopment unviable. Is it saying that its profits will decline from being massive to merely being huge?

Has it supplied to the IPC the numbers, or is the applicant merely suggesting that it will make a little bit less than the massive profit it would have made if it went ahead and built something FOUR times the size of the current building, with a significant and devastating effect to various amenities?

Did the applicant assume upon buying Harbourside, that it would be able to do as it likes with very little concern for the area and its stakeholders (the public - and again, the applicant's neglect to provide enough public space in its plans).

Is the public to blame for any restrictions placed on the applicant, which is purely profit-driven?

“The Harbourside project in terms of its current overall proposition (uplift and public benefits) is finely balanced, however the imposition of the alternative building envelope identified by the IPC for assessment and consideration would cause the project to **no longer be viable.**”

Finely balanced for the applicant - there is NO proof it is finely balanced for the public and the locals and in terms of the reason Harbourside exists.

“In relation to the IPC's requested options analysis, it is noted that the built form massing adjustments would have a **devastating impact on the project fundamentals and associated benefits.**”

The project, even in its latest amended form, will have a devastating impact on the site, the public, tourism and the massive amount of money it currently injects into the economy. And, if it goes ahead, the damage will be permanent.

Any damage to the applicant will no doubt be a potential and small hit to its massive bottom line. Like any other applicant, it needs to do the right thing by the site, or go elsewhere.

An RL of 11.8 as suggested by the IPC would be a sensible, appropriate and beneficial move, if the majority of the public area is to be on the rooftop, which is suggested to have trees and other structures on it (which will make it even higher), along with being, as required, open 24/7. Anything higher would not be as beneficial an amenity for the public, and would cause permanent noise and privacy issues for the residential building, One Darling Harbour, the Ibis Hotel and potentially the Novotel Hotel.

The applicant's, frankly, seemingly hysterical response to a request for an alternative response as suggested by the IPC is also evidenced by the following quote:

“If we are unable to identify **a viable scheme**, the existing Harbourside asset **will remain undeveloped** and will continue to negatively impact Darling Harbour for the remaining 65 years of the current leasehold.”

It's interesting that the applicant has resorted to what appears to be a thinly-veiled threat because it hasn't got its way. Is the applicant committing to keeping Harbourside for the entirety of the lease (65) years, and leaving it as is? I think we all know that would be highly unlikely and possibly even a suicidal business decision.

The applicant goes on to claim that the IPCs request would cause:

“Undermining the site’s State significance and contribution to local, district and regional planning objective”

The site's state significance comes from it being a major Australian tourism precinct, enhanced by the historic Pyrmont Bridge. Even the applicant's revised plan detracts enormously from that, by being a majority office and residential development, and reducing by more than half the food and retail outlets, which along with the bridge and harbour, attract the public, both local and international. Not to mention its proximity to the bridge.

“Rendering the project commercially unviable at a time when NSW’s recovery from COVID-19 requires the support of important industries such as the construction and development industry – which drive a significant amount of economic activity in NSW”

The applicant stresses the above, yet it's willing to walk away unless it gets its way with a mostly office and residential proposal that will NOT benefit the public and will change the heart of Darling Harbour to a commercial entity with limited appeal to the masses forever.

Proposing a plan that will consider the sensitivity of the site is the applicant's sure-fire way of getting people on side, and creating a development that will truly enhance the site for the public, while also protecting the Pyrmont Bridge.

“Removing the ability of the project to fund and deliver the significant public benefits as envisaged”

The applicant is NOT providing "significant public benefits" with its latest proposal. It really hasn't made enough concessions for the public good. It has mostly moved some parts of the plan to others, and made minor reductions that will see very little benefit for the public and view loss.

The applicant may be looking at recent surrounding developments which are on a large scale and assuming it can do the same, but Harbourside **differs significantly** from the Ribbon development (the old IMAX), the approved Cockle Bay development and those at Barangaroo. It does not border the Sydney CBD. It does not back on to commercial buildings. It was never intended to be taken from the public to be used mainly for commercial interests and profits.

Harbourside attracts enough people with its current makeup to ensure one hell of a lot of money is pumped into the economy. If it's enhanced, not destroyed, it will continue to contribute to the state's coffers in a much bigger way than if its characteristics are decimated for pure profit by a corporate entity.

Unless there is a plan for Darling Harbour to no longer be a state significant site that draws many millions of people a year, pouring billions into the economy (that's truly employment generating!) - then this development can NOT go ahead in the form of the applicant's revised plans (or its previous plans).

The IPC must be commended for requesting alternative plans from the applicant. We trust it will continue to see through any prejudice and/or false statements, and we thank it for allowing us to take part in this process.

Regards

 (PLEASE DELETE NAME IF PUBLISHED)

