# Submission to Barangaroo Concept Plan Modification 8

From:

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I object to the Barangaroo Concept Plan Modification 8 and State Environmental Planning Policy Amendment (Barangaroo) 2015 Plan due to several factors which I believe are not conducive to the needs of the community.

## ➤ Heritage concerns:

The proposal for MOD 8 is a stark departure from the nearby Millers Point Heritage Conservation area, and completely overwhelms the character that this area tries to preserve. The plans of MOD 8 do not attempt to enmesh or reflect the area's conservation sites, as seen through the concept design photos of the hulking towers that shadow over the area with an ultra-modern architecture style, completely unsympathetic to the heritage formations below. Further, the proposed development will affect many individual heritage landmarks scattered across the area; including Miller Point and Dawes Point Village Precinct; Messenger's Cottage for Fort Phillip Signal Station; Fort Phillip Signal Station; Bureau of Meteorology; Fort Street Primary School site (and surrounding fig trees); National Trust Centre; Agar Steps; The former Grafton Bond Store in Miller Point; The former Moreton's Hotel; the former MWS stores; sandstone retaining wall of Sussex and Napoleon Streets and surrounding trees; heritage terraces and cottages of Munn Street and Merriman Street; terrace group on Agars Steps and Kent Street; Jenkins Street; Pyrmont Bridge; Jones Bay Wharf; the Sydney Harbour Bridge; Messenger's Cottage for Sydney Observatory and the Observatory Hill Park including Boer War Memorial, Bandstand, fences and landscape.

The Sydney Observatory, as recently warned in a Sydney Morning Herald article (13/5/15) is under great threat with this proposal. The article speaks of the cultural significance that the observatory holds, with its Southern Cross views that have been a popular local and tourist hotspot. However, these unique views will be adversely affected if the high rise casino and hotel complex are constructed. As stated: "The first session will suffer a loss of view for 24 hours across 32 days, or 18 per cent of current viewing days, viewing will be lost during the second session for 27 hours across 41 days, or 21 per cent of the current viewing days". This is an immeasurable loss to a culturally and globally significant building, and it seems the "negligible" affect, as stated by a consultant from Barangaroo developer Lend Lease, is influenced by the substantial profits that the new development will incur. The threat that this

poses to the local area and the loss of character and public amenity has not been taken into proper account, which is disastrous for the area and for Sydney's cultural preservation.

Further, I urge further investigation into JBA Planning's statement that 'heritage views will not be affected by the proposed Concept Plan Modification'. As one of the tallest buildings proposed in Sydney, it is clear that this building aims to be a statement piece of Sydney, which threatens to diminish other focus points in Sydney that have heritage and cultural value. This proposal adds no heritage or cultural value to our city, and will merely turn this area into an enclave for the rich.

This proposed development gives no consideration to its surrounding land, and its grotesque bulk and height sweeps over and overwhelms some of our city's most iconic and characteristic landmarks, to appeal to the 'high roller' market. Architecturally, and due to its immense size and its visual disconnection between Sydney's landmarks, this is a completely inappropriate development.

# Overshadowing concerns

The released shadow effects of MOD 8 are detrimental to Darling Harbour and Jones Bay Wharf, a high value and iconic national destination of Australia. As the City of Sydney reports, the Harbour's waters will be overshadowed by MOD 8 in the mid to late morning hours throughout autumn and spring. This creates a further encroachment on the connectivity and ambiance of the harbour for half of every year, and should therefore not be permitted (http://www.smh.com.au/nsw/city-of-sydney-says-modified-barangaroo-casino-plan-has-no-public-benefit-20150513-gh0p7t.html).

## > Public amenity and benefit

The current proposal around MOD 8 is a severe delineation from the original vision of the site, which included plans for a foreshore park; a clear and needed amenity for public benefit, particularly in this part of the city. The removal of this proposal is disappointing for the community, and undermines the headland park which could be expanded into a great community asset with a connected foreshore park, blending the landscape into an active and publicly accessible hub. Instead, there are well-placed fears within the community that this proposal will "give the casino a waterfront exclusion zone", limiting or excluding public access to this iconic position (<a href="http://www.afr.com/real-estate/harbour-lobby-group-fears-for-public-waterfront-access-at-barangaroo-20150513-gh0n4s">http://www.afr.com/real-estate/harbour-lobby-group-fears-for-public-waterfront-access-at-barangaroo-20150513-gh0n4s</a>). This is public land, and more must be done to prevent this from becoming an exclusive area to the hands of the Casino/Hotel. It must not be forgotten that this development has been granted at the expense of once proposed public parkland and proposals to "(link the city by a network of generous public streets and new public transport")

(http://www.propertyobserver.com.au/finding/location/nsw/40670-sydney-risks-becoming-a-dumb-disposable-city-for-the-rich.html). The foreshore parklands' relocation to the rear of

the site, near a main road instead of the waterfront, is a tremendous loss for public amenity. This is a development of private benefit.

Not only does this proposal offer no public amenity, it also threatens current beneficial public landscapes, including the heritage conservation areas as discussed above. With the revoked plans of the parklands, I would expect there to be at least some attempt to include a substantial publicly accessible open space, and far more public green space than proposed. This development panders to the private market and neglects its social, heritage, and environmental responsibility. The parkland that is proposed is inadequate, appearing as an afterthought to the casino/hotel, rather than as a functional, usable space. This is demonstrated through the likely wind pocket in which it is likely to sit. Original plans which positioned parkland on the foreshore of the harbour represented a much clearer proposal for public benefit. The current MOD 8 has not demonstrated its commitment to social and environmental amenities, as the Casino/Hotel in its proposed position would block views to Headland Park, as well as views beyond the harbour. Lend Lease's Barangaroo South Managing Director, Andrew Wilson, inaccurately promotes MOD 8's public benefit, claiming "We have ensured that all of the public benefits that we originally proposed in our 2010 plan remain in Mod 8, such as complete harbour-front access and vibrant community spaces" (http://www.urbanalyst.com/in-the-news/new-south-wales/3209-lend-lease-submitsrevised-concept-plan-for-barangaroo-south.html). This is a misleading statement, demonstrated through the increased height and bulk of the hotel/casino since 2010, which undoubtedly will create far greater shadow effects and segregated open space, in allowing room for this immense development.

Further to this, crime rates are likely to increase due to the segregated public space which minimises casual public surveillance. The Star Casino, also owned by James Packer, has received exemption from lockout laws - a law implemented to reduce assault – and reports indicate that assault rates have doubled around the Star in 2014 to 76 reported assaults (<a href="http://www.inthemix.com.au/news/60023/Assaults\_have\_doubled\_at\_Sydneys\_casino\_since\_lockouts">http://www.inthemix.com.au/news/60023/Assaults\_have\_doubled\_at\_Sydneys\_casino\_since\_lockouts</a>), yet still it remains immune to the laws that govern its surroundings. While the Barangaroo site will also be exempt from this law, it is concerning to see at this stage, its disregard for crime in its conceptual stages.

The values of James Packer and his proposal for our city are very clearly enveloped in his push to make 20,000 square meters of gaming space a smoking space (http://www.smh.com.au/business/smoking-exemption-for-packer-casino-blasted-20130708-2plbm.html). Not only is this concerning in its blatantly profit-driven attack on health measures, but perhaps what is most concerning is that he has been successful in his attempts to overthrow smoking laws in NSW. To what public benefit this amounts I am sure there is none, but the transparency surrounding this development is highly perturbing in receiving such unimaginable exemptions in the name of profit.

Further to this, for one of our City's tallest, and therefore, more visible buildings to have a 'high rollers' casino beating within its walls, the values of our City including the provision of cultural and social spaces highly threatened by steamrolling corporate interests. With the

continuation of such additions, our city will be transformed out of its character of diverse populations, artistic nuances and culturally diverse landmarks, and into a bland den for the rich.

As recognised by the City of Sydney, the MOP 8 incorporates a misleading report of public open space, including the new roads proposed for the vehicular access to the casino/hotel tower. This addition in fact accounts for a reduction in open space, as stated in the City of Sydney submission "Roads and laneways are not to be counted as public open space" (p 21). I request an accurate report to be researched by an independent body in order to assess the true public open space in this proposal.

Whilst the proposal for Barangaroo Crown Casino/Hotel has kept increasing, with hospitality floor space jumping up 79% from original plans, public benefit remains negligible (<a href="http://www.smh.com.au/nsw/city-of-sydney-says-modified-barangaroo-casino-plan-has-no-public-benefit-20150513-gh0p7t.html">http://www.smh.com.au/nsw/city-of-sydney-says-modified-barangaroo-casino-plan-has-no-public-benefit-20150513-gh0p7t.html</a>). As this report suggests, "usable public space has been reduced below 50 per cent". This indicates a significant and fundamental shift from original plans, resembling no beneficial traces of its inception.

## > Affordable housing

The City of Sydney, and Sydney at large, is in the middle of a renowned housing crisis, and is now recognised as the third least affordable city in the world to buy or rent (<a href="http://mckellinstitute.org.au/the-housing-affordability-crisis">http://mckellinstitute.org.au/the-housing-affordability-crisis</a>). Meanwhile, the City of Sydney Council is aiming to address this through a target of achieving 7.5% affordable housing by 2030

(http://www.cityofsydney.nsw.gov.au/ data/assets/pdf\_file/0016/231316/150421\_PDC\_ITE M02.pdf). Further, as they state in their submission to MOD 8, for integral areas such as Barangaroo, the target is increased to provide at least 10% affordable housing, and preferably 20%. This is a needed target not only to keep people on a low-mid income in the city and within a reasonable distance to work, but also to maintain a socially and culturally diverse city, and to maintain the cultural character embedded within communities (http://www.news.com.au/finance/real-estate/the-affordable-housing-solution-that-actually-works/story-fncq3era-1227266239358). On an international scale, the City of Sydney's targets are quite modest, given that London requires 35% of new developments to be affordable housing. Amsterdam has mandated an even greater affordable housing target where nearly 50% of all housing is social housing, and 30% of new dwellings are required to be affordable housing (http://www.news.com.au/finance/real-estate/the-affordable-housing-solution-that-actually-works/story-fncq3era-1227266239358).

As the City of Sydney Council notes, the area of Barangaroo and Millers Point holds a historic emphasis on the provision of social housing and publicly owned land, with this development itself taking place on NSW Government land. Lend Lease is obliged to provide a nominal and ineffectual affordable housing amount up to 2.3% of its residential floor space. Considering the likely profits and homogenising affect that this Casino/Hotel will garner, this

is absolutely insufficient, and indeed negligent in its social responsibility. I request that the Concept Plan incorporates a condition which commits Barangaroo South to 20% affordable housing, considering its substantial increase in height and bulk since its conception.