

Dear Fiona,

**MP 07\_0144 MOD 1 - MODIFICATION TO CONCEPT PLAN AT ENTERTAINMENT QUARTER, MOORE PARK**

Thank you for the opportunity to provide comment on the abovementioned modification application. City planning staff have reviewed the submission. We note that when considering an extension to the lapse date the Minister *"is to review the approval before extending the lapsing period and may make other modifications to the approval (whether or not requested by the proponent)"* (Environmental Planning and Assessment Act 1979, s75Y(2)).

In light of the above we request that the original application, including the City's original submission, is reviewed in its entirety in accordance with Section 75Y(2). For your convenience, the City's original submission is attached.

I trust this is clear, however if you need to discuss further please don't hesitate to contact me.

Best regards,  
Chris

Christopher Ashworth  
Senior Planner  
Planning Assessments



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26 November 2009

Our Ref : 2009/246862

Your Ref: MP07\_0144

Mr Daniel Keary

Director, Government Lands and Social Planning Assessments

Department of Planning

GPO Box 39

Sydney NSW 2001

Dear Mr Keary,

**Entertainment Quarter, Moore Park Showgrounds Concept Plan (MP07\_0144)**

I respond to your referral regarding the above application submitted under Part 3A of the Environmental Planning and Assessment Act.

The Concept Plan seeks approval to demolish two buildings and to provide 26,187sqm of additional floor space within nine new buildings. Approval is sought for the locations, massing and maximum heights of the buildings.

Given the time frame to make comment on the development, the proposal was not referred to the Planning, Development and Transport Committee or the Central Sydney Planning Committee (CSPC) for comment.

The City of Sydney previously provided advice when a preliminary concept plan application was submitted in 2007 and it appears that the plans have not changed and the building envelopes are the same as that scheme.

I have provided general comments on the development as a whole and in respect of the individual building envelopes proposed under the Concept Plan.

**General**

The development proposed will bring the overall floor space for the site to no more than the maximum permitted under Clause 16 of State Environmental Planning Policy No. 47. The City is concerned to note that no information is available as to the use of the buildings given the extent of the additional floorspace proposed.

Two existing buildings will be demolished to make way for the development of these sites for two new buildings on the site. In view of the low heritage significance of these, the City has no objection in principle to their demolition. Of more concern is the proposal to build on existing areas of open space. This will lead to the loss of recreational space on the site and will impact on the functionality of the site as a whole, particularly when larger events are being staged that demand a high degree of crowd management. The City is concerned that these issues have not been adequately addressed in the documentation submitted with the application.

Notwithstanding these general issues of concern, comments are provided below in respect of the built form proposed on the individual sites.

*city of villages*

### **Development Site A**

This building, which will be built next to the Byron Kennedy Hall, should be reduced in width so that it matches the alignment of the hall and the curved building next to it, reinforcing the existing street and building pattern. It should also be setback from the masonry boundary wall, given its importance in the context of the site.

### **Development Sites B, C and D**

A key issue that was previously raised is the impact that the new Buildings B, C and D have both on surrounding heritage items and the reinforcement and protection of significant view corridors.

Building B is of low heritage significance and no objection is raised in principle to its demolition. However, the spacing between the proposed Buildings B and C should be increased to match the building alignment to the west and to maintain the view corridor looking east along Chelmsford Avenue. The width and subsequent footprint of Building C should also be pulled back from the north and should match the northern alignment of Building E at the very least.

In the current proposal the upper levels of the buildings on the southern side of the site will block the views of the clock tower of Byron Kennedy Hall from the Parade Ring. Accordingly, the massing on Building B above RL 49.5 should be setback from the southern boundary of the site so that the clock tower remains visible and terminates the vista as viewed from the Parade Ring. Refer to View 4 – Site B, C, D and E. Buildings B2 and C2 also need to be carefully designed to ensure a high quality design relationship with the Parade Ring space and Building C1 should not exceed three levels in height as recommended in the Heritage Impact Statement.

Building D should be reduced in width and realigned so that it will match the alignment of the building to the north, allowing a greater sense of openness in this area and for tree planting to be provided along the street frontage. Again the proposed building should be carefully designed so as to result in a high quality design relationship with the Parade Ring space and the adjoining building.

### **Development Site E**

This proposal is generally acceptable as the proposed building will reinforce the Parade Ring and the alignment of Suttor Avenue. However it will need to be carefully designed to ensure a high quality design relationship with the Parade Ring space.

### **Development Site F**

The City is concerned about the erection of a building on this site. It will have an impact on the setting and views of both the Fox and Lion Hotel and the Royal Hall of Industries and will sit taller than the existing car park. A new building at this location is not supported. If a building is approved, it should be reduced in height by at least two storeys to match the parapet height of the car parking structures and be designed to include a corner building element to reinforce the corner location.



It is noted that building on this site would result in the loss of an existing fig tree identified as being of considerable significance and that it is recommended that the tree is transplanted to an alternative location elsewhere on the site. The City's Tree Officer has inspected the site and advises that the tree is in poor health and condition and should be replaced with another advanced fig tree.

### **Development Site G**

The erection of a building at this location is considered generally acceptable subject to:

- The new building being setback from the Lang Road boundary wall, which is identified as being of exceptional significance. This should stand proud of any new building;
- The recent wall to Errol Flynn Boulevard being retained in the future development so as to provide an enclosure for the site and the Entertainment Quarter as a whole;
- The detailed design of this building complimenting the scale and character of the adjoining stables.

### **Development Site H**

The proposed additions to this building will have little impact.

### **Development Site K**

Generally this will have little impact as the scale and form is considered to be appropriate. However the building will need to be sympathetically designed to minimise any impacts on the adjoining Heritage Park.

### **Traffic and Transport Impacts**

The City supports the request from NSW Transport and Infrastructure (formerly the Ministry of Transport) to have a cap placed on the parking levels. The RTA should be consulted on the functionality of the intersection of Anzac Parade, Lang Road and Cleveland Street as a result of the development.

### **Conclusion**

In commenting on proposal in general, the accumulative impact of the proposed new developments has the potential to erode the character and significance of the site, particularly in relation to the loss of views, open space and the adverse impacts on the setting of existing heritage buildings.

It is considered essential that a strategy is formulated before the design of the buildings on the subject site are developed further to guide future landscaping and use planning of public open space and circulation areas. The recommendations of this strategy should then be fed into the Masterplan.

The height and massing of the buildings in general do not reflect the strong controlling parapet height of buildings along the Parade Ring and there is no clear requirement in the Masterplan for vertical articulation in the massing in response to the context of individual buildings. The Masterplan should include a series of clear objectives relating to these key urban design principles.

Building alignments, massing and setbacks above key RL levels should be specified and should form part of the controls of the Masterplan including the identification of key view corridors and means of preserving or reinforcing them. Specifically, it is important that an adjustment is made to some of the building footprints as indicated, ensuring a more appropriate height and massing for Buildings B and C and not proceeding with Building F.

In order to assist you, given the concerns outlined above, please feel free to contact the City of Sydney to initiate further discussion. If you require any further information please contact Philip Jamieson by telephone on 9265 9333 (call centre number) or by email at [pjamieson@cityofsydney.nsw.gov.au](mailto:pjamieson@cityofsydney.nsw.gov.au).

Yours sincerely,



**MONICA BARONE**  
Chief Executive Officer