



The University of Sydney

Angkor Program

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Sept 10th, 2010

Following is my response to the proposed changes of the concept plan for Barangaroo as specified in MP06_0162 MOD 4 (Hotel development, additional GFA and Height) – Exhibition. While the proposed changes include many faults, I would like to emphasize three major drawbacks.

The first is the weakened integration of the urban and the parkland areas; the second is the degraded connectivity and texture of the public realm both within the envelope of the masterplan and with the adjacent interface of the cbd; and lastly the fragmentation and reduction in area of the parkland.

1. The parkland areas of the site do not have sufficient connection with the urban areas due to the recent amendments of the original plan. The reduction in the number of streets running east west from 11 to 5, and the removal of all the new north south links running the complete length of the park and the urban precinct, drastically limits the successful integration of the park with the city. Impacts include the restriction of pedestrian movement to and from the park and limit the aesthetic impact of the park by reducing sightlines to and from the city and with adjacent areas. This physical separation and isolation of the parkland from the urban areas will be further exacerbated by the commissioning process which sees the parkland and urban public realm designed by separate designers in a fragmented development processes. This repeats the mistake of the Sydney Olympic Park precinct and Millennium Parklands are isolated from each other and therefore underutilized. Instead a single urban designer and landscape architect needs to oversee the development of the public space framework. The public realm should be fully constructed before any private space is built. This is the way to convince the public that their needs and benefits are the first and most important priority in relation to the development of Barangaroo.

2. The amendments distort and degrade the competition winning street pattern proposed in the TBI (Thalis Berkmeier, Irwin) competition winning entry. This needs to be reversed. The amendments result in over-scaled block sizes and a reduction in human scaled urban precincts necessary for the creation of live-able cities. The reliance on large blocks and a private hotel to provide public space is a serious mistake. They will not deliver the required quality of public space both due to the private nature of the proposed programs and the commercial typology selected for the precinct. . The misalignments, deletion and truncations of the numerous streets proposed in the original competition winning scheme by TBI reduces the public comfort and beauty and live-ability ability of the future urban present.
3. The fragmentation and reduction of the area of parklands needs to be reversed. In effect the changes cut the site into three disjointed, dysfunctional and inaccessible enclaves – a fundamental and inexcusable error that is contrary to the planning principles of the original Concept Plan. The proposed parklands will cost a great deal more than the original concept and will deliver less parkland both in terms of raw square metres and in terms of square metres per public dollar spent. The opportunity to provide a new large park to equal the resource of the royal botanic gardens on the east side of the cbd and in close proximity to the city is not only rare but is unique. This is the only space able to provide such a resource and the current amendments do not deliver the scale and impact of such a resource. The successive amendments to the concept plan have led to a clear reduction of the public space and parkland. The unnecessary fragmentation of the public foreshore is excessive in cost and greatly reduces its extent.

The irrational and flawed basis of the design thinking in the amendments is exacerbated by the non-transparent, non-consultative and ultimately autocratic planning process promoted by the state labour government and carried out by the Barangaroo Authority. It is definitely not world's best practice and if pursued will result in a substandard and parochial outcome in what is a global and cosmopolitan city.

Regards Scott Hawken. B.LArch (UNSW)

David Gibson - Online Submission from Raymond Verth of Home owner (object)

From: Raymond Verth <brooklands1@tiscali.co.uk>
To: David Gibson <david.gibson@planning.nsw.gov.au>
Date: 10/09/2010 7:27 PM
Subject: Online Submission from Raymond Verth of Home owner (object)
CC: <assessments@planning.nsw.gov.au>

This development is totally unacceptable for the area and breaks many existing planning rules and regulations. It should never have been considered as an option, let alone reached this unbelievable stage of approval.

Name: Raymond Verth
Organisation: Home owner

Address:
1403/23 Shelley Stree
Sydney
NSW 2000

IP Address: 79-79-176-231.dynamic.dsl.as9105.com - 79.79.176.231

Submission for Job: #3803 MP06_0162 MOD 4 (Hotel development, additional GFA and Height)
https://majorprojects.onhiive.com/index.pl?action=view_job&id=3803

Site: #188 Barangaroo (formerly East Darling Harbour)
https://majorprojects.onhiive.com/index.pl?action=view_site&id=188

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10/9/2010

Director, Government Land and Social Projects

NSW Department of Planning

GOP Box 39

SYDNEY NSW 2001

Email: plan_comment@planning.nsw.gov.au

Dear Sir/Madam

Submission RE: Barangaroo Concept Plan Amendment MP06_0162 MOD 4

I am an owner of an apartment on Kent Street in the Stamford on Kent building. I have the following objects to the proposed modifications in the above mentioned Plan Amendment.

These objections are;

1. The increase in height and the placement of residential towers in Block 4.
2. The current building height in Block 2 and the increase in building height in Block 3.
3. The reduction in width of the public promenade.
4. The absence of ferry passenger terminal infrastructure.

The reasons for these objections are;

1. The proposed positioning of the towers in Block 4 significantly reduces westerly views from our building and also negatively impacts on privacy between the buildings. The building height as proposed would result in major shadowing effects on the existing surrounding residential buildings. The extreme difference in the proposed building height and the existing apartment buildings in Kent Street and Hickson Road will also negatively affect the liveability and value of the existing buildings.
2. The building heights of the commercial buildings in Blocks 2 and 3 are objected to as it would allow these buildings to be significantly taller than the existing buildings immediately along their eastern boundary. This would have a negative impact on the city profile when viewed from the north or south as the profile would have an unbalanced and out of proportional height increase on the western side. This I see as a bad outcome for the City of Sydney as a whole.

3. The Public Promenade at 27m minimum width maybe too narrow to accommodate potential crowds at peak times. This problem has been observed along King Street Wharf which is a similar width to what is proposed.
4. There does not appear to be a provision for any public ferry infrastructure in the plans or any mention of integration with existing ferry services in the Environmental Assessment. This should be addressed given the sites waterfront proximity.

Thank you for your attention.

Yours sincerely,



Paul David

Unit 1010

Stamford on Kent

183 Kent St

Millers Point NSW 2000

David Gibson - Online Submission from Paul Chilcott ()

From: Paul Chilcott <paulchilcott@hotmail.com>
To: David Gibson <david.gibson@planning.nsw.gov.au>
Date: 10/09/2010 5:32 PM
Subject: Online Submission from Paul Chilcott ()
CC: <assessments@planning.nsw.gov.au>

The increased height of the towers is too high. The towers adjoining the existing business district can be as high as those to the east (in fact a greater number of floors due to the lower ground level of the site due to the cutting of the sandstone cliff). However, there needs to be a 'stepping down' of the tower height closer as buildings move closer to the water edge. This is best means of preserving sunlight and views for the entire site and minimising wind tunnels.

There seems to be a justification for the increased height by the large harbour inlet areas proposed. On that basis, a smaller harbour inlet would be preferred compared to the additional building height now sought. Leaving the existing shoreline much as it is may avoid high expenditure and leave site contamination undisturbed, which may be preferable.

The idea of the building / hotel protruding into the current waterway needs to be abandoned.

Given the current proposal varies so much from the adopted scheme, can it be considered to be 'substantially the same' development? I don't think it can.

Name: Paul Chilcott

Address:

PO Box 172, St Pauls NSW 2031

IP Address: - 218.185.86.135

Submission for Job: #3803 MP06_0162 MOD 4 (Hotel development, additional GFA and Height)

https://majorprojects.onhive.com/index.pl?action=view_job&id=3803

Site: #188 Barangaroo (formerly East Darling Harbour)

https://majorprojects.onhive.com/index.pl?action=view_site&id=188

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David Gibson - Online Submission from Neish Chowdhury (object)

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To: David Gibson <david.gibson@planning.nsw.gov.au>
Date: 10/09/2010 11:13 PM
Subject: Online Submission from Neish Chowdhury (object)
CC: <assessments@planning.nsw.gov.au>

Please do not let our beautiful city be desecrated in such a foul and felonious manner.

Name: Neish Chowdhury

Address:
4/265 Cleveland Street
Redfern
New South Wales
2016

IP Address: - 202.124.75.5

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David Gibson - Online Submission from Larissa Marriner of Myself ()

From: Larissa Marriner <larissamarriner@hotmail.com>
To: David Gibson <david.gibson@planning.nsw.gov.au>
Date: 10/09/2010 11:09 PM
Subject: Online Submission from Larissa Marriner of Myself ()
CC: <assessments@planning.nsw.gov.au>

This jewel of the emerald city should not be destroyed. I'm sick of avaricious developers staining our seascape. Please do not let this development go ahead. It is so short-sighted.

Name: Larissa Marriner
Organisation: Myself

Address:
4/265 Cleveland Street
Redfern
New South Wales
2016

IP Address: - 202.124.75.5

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David Gibson - Online Submission from Helen Marriner of Representing self (object)

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To: David Gibson <david.gibson@planning.nsw.gov.au>
Date: 10/09/2010 11:03 PM
Subject: Online Submission from Helen Marriner of Representing self (object)
CC: <assessments@planning.nsw.gov.au>

I strongly oppose this development as it represents an environmental and cultural desecration.

Name: Helen Marriner
Organisation: Representing self

Address:
38 Waterview Street
Balmain
New South Wales
2041

IP Address: - 202.124.75.5

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Date: 10/09/2010 7:00 PM
Subject: Online Submission from geeves o'shea (object)
CC: <assessments@planning.nsw.gov.au>

object

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David Gibson - Online Submission from Evan Malter (object)

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To: David Gibson <david.gibson@planning.nsw.gov.au>
Date: 10/09/2010 4:34 PM
Subject: Online Submission from Evan Malter (object)
CC: <assessments@planning.nsw.gov.au>

This was meant to be a place for the public developed by many developers with the purpose of bringing a beautiful new place to the people. A hotel is fine, but this project seems to have become about tall building more floor space and architects egos rather than about creating great open space for the people of Sydney.

Name: Evan Malter

Address:
17/56A Pirrama Road
Pyrmont NSW 2009

IP Address: rrcs-24-39-113-70.nyc.biz.rr.com - 24.39.113.70

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David Gibson - Online Submission from Elizabeth Verth of Home owner (object)

From: Elizabeth Verth <dizi_verth@hotmail.com>
To: David Gibson <david.gibson@planning.nsw.gov.au>
Date: 10/09/2010 7:38 PM
Subject: Online Submission from Elizabeth Verth of Home owner (object)
CC: <assessments@planning.nsw.gov.au>

This development proposal for Barangaroo South is totally unacceptable and breaches many existing planning regulations. It is yet another example of the gerrymandering politics of the NSW Labour government who will stop at nothing to achieve their own power and financial gains. This Dubai-style proposal should never even have made it off the drawing board, let alone reached this stage of final submission. I object totally to this development proposal that will change the face of this area forever, but not for the good of Sydney.

Name: Elizabeth Verth
Organisation: Home owner

Address:
1403/23 Shelley Street
Sydney
NSW 2000

IP Address: 79-79-176-231.dynamic.dsl.as9105.com - 79.79.176.231

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153

David Gibson - Online Submission from Diana Comino of ACH Clifford (object)

From: Diana Comino <thehuntressis@hotmail.com>
To: David Gibson <david.gibson@planning.nsw.gov.au>
Date: 10/09/2010 4:08 PM
Subject: Online Submission from Diana Comino of ACH Clifford (object)
CC: <assessments@planning.nsw.gov.au>

I totally OBJECT to the current proposal. It is hideously overdeveloping beautiful Sydney Harbour, and should not be allowed. This will be a blight on any government that allows this to go ahead.

Name: Diana Comino
Organisation: ACH Clifford

Address:
34 Wallis St Woollahra

IP Address: 110-174-142-178.static.tpgi.com.au - 110.174.142.178

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David Gibson - Online Submission from Basil Lee (support)

From: Basil Lee <baz77_@hotmail.com>
To: David Gibson <david.gibson@planning.nsw.gov.au>
Date: 10/09/2010 11:22 PM
Subject: Online Submission from Basil Lee (support)
CC: <assessments@planning.nsw.gov.au>

I fully support the proposed height changes to the Barangaroo south development and the hotel. This is a project vital for the the financial future of the whole of Sydney and it should not be derailed simply because a minority are more interested in preserving their harbour views.

Sydney has been on a slippery slide downwards for years and this project in my opinion is required to inject much needed investment and job creation into the city, provide a distinct, identifiable feature for our tourism and secure Sydney's place as a global city. The new building heights also pale in comparison to new buildings built and in the planning within Brisbane and Melbourne. Sydney must not fall behind due to the self interest of minority property owner.

Name: Basil Lee

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413/3 Herbert Street, St. Leonards NSW 2065

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**David Gibson - Online Submission from Andrew Li (support)**

From: Andrew Li <z3221439@student.unsw.edu.au>
To: David Gibson <david.gibson@planning.nsw.gov.au>
Date: 10/09/2010 7:01 PM
Subject: Online Submission from Andrew Li (support)
CC: <assessments@planning.nsw.gov.au>

I'd like to voice my approval of this project. It is visionary, looks great, and something that Sydney very sorely needs. Sydney is the largest, most important city in Australia as well as its financial capital. This project will deliver much needed facilities all over, including office space, hotel rooms and residential households to keep up with the global cities of the world.

There are many opponents to this project, such as those from the "Barangaroo Action Group." I implore you not to listen to them because I truly believe their wishes are selfish, a true reflection of the sad "NIMBYism" that holds our wonderful city back. They do not see what good this project will be for our city, in terms of our economy, our progress, and for our global image.

My only regret is that the project is not even bigger and more iconic than it already is. Sydney has not had any visionary developments for a while, and this one is long overdue. I hope you approve this project so that it can start as soon as possible. Thank you.

Name: Andrew Li

Address:

14 Blackwattle Place Cherrybrook

IP Address: c211-30-206-136.thorn2.nsw.optusnet.com.au - 211.30.206.136

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SUBMISSION TO MP06_0162 [MOD4]

Barangaroo South Concept Plan Modification
and Major Development SEPP Amendment

10 September 2010

urbis

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Director	Peter Strudwick
Consultant	Yi-Juan Koh
Job Code	SA4329
Report Detail	DR MOD 4 EA_MP06_0162 – Final Submission

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1	Introduction.....	2
1.1	Background	2
1.2	Purpose of Submission.....	2
1.3	Consultation.....	3
2	Proposed Modifications.....	4
3	Design Rationale	6
3.1	Comparison of Approved and Proposed Built Form Principles	6
3.2	Analysis of Approved and Proposed Built Form Principles	9
4	Impacts	13
4.1	Direct Impacts to Southern Adjoining Buildings	13
4.2	Impacts Internal to Barangaroo South.....	23
5	Recommendations	25
5.1	Summary of Impacts.....	25
5.2	Submission Recommendations.....	26

FIGURES:

Figure 1 – View Impacts Generated by Block 1	18
Figure 2 – View Impacts Generated by Block 2	19
Figure 4 – Proposed Modification: Street Connections (EA Report 2010, p 63)	21

TABLES:

Table 1 – Comparison of Approved Concept Plan and Proposed Modifications (Barangaroo South)	4
Table 2 – Comparison of Concept Plan Modifications: Height and Floor Space (Barangaroo South)	5
Table 3 – Built Form Principles Comparison.....	6
Table 4 – Assessment of Stated Benefits of the Revised Scheme	10
Table 5 – Overshadowing Impacts of Revised Scheme (21 June)	14
Table 6 – Comparison of Total Vehicle Trips.....	22

1 Introduction

Urbis has been engaged by Brookfield and Colonial to review the issues and impacts arising from the proposed Barangaroo South Concept Plan Modification and Major Development SEPP Amendment, and prepare a submission on their behalf for the Department of Planning's consideration. Brookfield and other parties own assets that immediately adjoin the site to the south; being Macquarie Bank building, KPMG Tower, King Street Wharf retail precinct, and AMEX House.

Brookfield and Colonial have significant property assets within the King Street Wharf Precinct, and specifically seek to retain and protect the value of those assets as part of the Barangaroo redevelopment. Asset owners like Brookfield and Colonial have a vested interest in the success of Barangaroo and, like many interested public and private stakeholders in the area (and broader public interest groups), wish to see an appropriate, high quality and commensurate outcome for the site.

The framework for this outcome must be established as part of the current Concept Plan to provide the ability and confidence that future Project Applications will deliver the detailed urban design, buildings and spaces that will contribute to the values and success of the broader Western City corridor.

1.1 Background

The proposed modifications the subject of this application, is the fourth amendment seeking approval since original Concept Plan approval in 2007. Since then, the following modifications have been sought and approved (Environmental Assessment Report 2010, p 30):

- Modification 1 (2007): Correction of typographical errors in the Concept Plan Instrument of Approval, and modification to design excellence requirements.
- Modification 2 (2009): Additional 120,000sqm of commercial floor space on the site.
- Modification 3 (2009): Amended design to Headland and Northern Cove, removal of Blocks 7 and 8, reduction of 18,800sqm floor space and removal of Sydney Ports Harbour Control tower.

The current modification application (MP06_0162 MOD4) seeks approval for further additional floor space and significant alterations to envelope height, the introduction of two additional development blocks (including hotel addition into the Harbour), changes to the internal street network within Barangaroo South and a redefinition of the urban design principles.

1.2 Purpose of Submission

Modification 4 demonstrates a departure from the approved Concept Plan (as modified). As such, the proposed changed impacts will be assessed to determine the degree of additional impacts on the assets of Brookfield and Colonial. As such, this submission will:

- Review the Barangaroo South Concept Plan Modification and Major Development SEPP Amendment.
- Determine what the modifications of the current proposal are compared to the approved Concept Plan.
- Identify the impacts generated by the proposed modifications, as an addition to what has already been approved by the Concept Plan.
- Assess the degree of these impacts on immediately adjoining properties to the south as well as various internal impacts on Barangaroo South itself.
- Provide recommendations to improve the current scheme to the benefit of not only adjoining land owners, but also the broader community.

We assume the impacts raised in this submission will be closely considered, given the statutory requirement for the applicant to address the applicable Director General's Requirements (2 July 2010), and the Department of Planning's obligation as consent authority to ensure these requirements have been met.

1.3 Consultation

While we assume that consultation has occurred in the preparation of the proposed Concept Plan amendment, we are advised by both Brookfield and Colonial (who are landowners of immediately adjoining buildings) that no direct contact has been made with either company. On this basis, the applicant (and Department of Planning) need to assure themselves that this is appropriate under the provisions the Department's Major Project Community Consultation Guidelines (October 2007), as required under item 16 of the Director General's Environmental Assessment Requirements.

Both Brookfield and Colonial would welcome the opportunity of proactive consultation with the applicant with this proposal and ongoing project applications that directly adjoin their assets. This early and proactive consultation would seek to:

- Facilitate a scheme that reduces the proposal's impacts on directly adjoining properties.
- Provide greater certainty for approval timeframes and generally facilitate a smoother process for the applicant; and (importantly).
- Result in a well considered design response that retains and enhances amenity and value of properties within the broader area while achieving the applicant's own commercial objectives.

2 Proposed Modifications

Based on the approved Concept Plan, a comparison of the key features of Barangaroo South with the proposed modifications, are provided.

Table 1 highlights the key changes proposed by the current modifications from the approved Concept Plan, being:

- An increase of the maximum allowable gross floor area in Barangaroo South by 59,965sqm.
- An increase to the length of the public foreshore promenade by 0.8km.
- The removal of 8,500sqm associated with the relocation of the passenger terminal.
- Increase in land accommodating 'active uses' by 1,500sqm.
- Reduction in the minimum width of the public foreshore promenade by 33m.
- The introduction of two additional building structures in Barangaroo South; being Block X fronting the foreshore promenade and Block Y (Hotel addition) of 18,908sqm and 33,000sqm respectively.

Table 1 – Comparison of Approved Concept Plan and Proposed Modifications (Barangaroo South)

	APPROVED CONCEPT PLAN	PROPOSED MODIFICATIONS
Max. Gross Floor Area (GFA)	430,275sqm	490,240sqm Residential: increase by 45,188sqm Commercial: increase by 14,777sqm
Public Open Space	11ha 1.4km public foreshore promenade	11ha 2.2km public foreshore promenade
Passenger Terminal	8,500sqm	-
Active uses	1,500sqm	3,000sqm
Public Promenade	60m width (minimum)	27m width (minimum)
Block X and Y	-	Block X: 18,908sqm and RL 41.5 Block Y: 33,000sqm and RL 170

The proposed modification to Barangaroo South seeks approval for an increase in height and floor space on selected Blocks. As detailed in Table 2, Block 1 proposes to increase the overall building height by 18m, in addition to height increases in Blocks 3 and 4B and 4C.

Table 2 – Comparison of Concept Plan Modifications: Height and Floor Space (Barangaroo South)

Area	APPROVED CONCEPT PLAN (and MOD 1) [^]		MOD 2 ^{^^}		MOD 3 [*]		PROPOSED MODIFICATIONS (MOD 4) ^{**}	
	Height (RL)	Floor Space (sqm)	Height (RL)	Floor Space (sqm)	Height (RL)	Floor Space (sqm)	Height (RL)	Floor Space (sqm)
Block 1	62	11,800	62	11,800	62	11,800	80	9,400
Block 2	180	180,000	180	211,907	180	211,907	180	209,213
Block 3	112	56,000	112	85,568	112	85,568	209	142,669
Block 4A	100		100		100		41.5	
Block 4B	100	74,500	100	121,000	100	121,000	175	77,050
Block 4C	100		100		100		160	
Block X	-	-	-	-	-	-	41.5	18,908
Block Y	-	-	-	-	-	-	170	33,000
Total (South)		322,300sqm		430,275sqm		430,275sqm		490,240sqm
TOTAL (North and South)		388,300sqm		508,300sqm		489,500sqm		549,465sqm

[^] Barangaroo Concept Plan – Instrument of Approval (9 February 2007)^{^^} Barangaroo Concept Plan – Instrument of Approval MOD2 (16 February 2009)^{*} Barangaroo Concept Plan – Instrument of Approval MOD3 (11 November 2009)^{**} Barangaroo Concept Plan – Consolidated Instrument of Approval MOD4 (August 2010)

The impacts generated by the proposed additional building height and floor space, in addition to other design changes, are subsequently assessed in this submission.

3 Design Rationale

3.1 Comparison of Approved and Proposed Built Form Principles

The proposed design modifications illustrate a significant departure from the original Concept Plan. As such, the associated built form principles of the proposed modification contained in the Urban Design Statement by Roger Stirk Harbour + Partners (2010, Section 5 – Built Form Principles) have also been altered from the original built form principles as they appear in the Barangaroo Modification Report (June 2008, Section 7.3.3). Table 3 compares the proposed changes of the built form principles.

Table 3 – Built Form Principles Comparison

	APPROVED CONCEPT PLAN	PROPOSED MODIFICATIONS	COMMENTS (By Urbis)
1. City's New Western Façade	<i>To create an integrated new western frontage to the city centre, the slender ends of the buildings (above podium level) are to be oriented to the waterfront to define an open silhouette.</i>	<i>To create an integrated new western frontage to the city centre, the slender ends of buildings (above podium level) are to be oriented to the waterfront to define an open silhouette.</i>	UNCHANGED The principle of integrating the site and its frontage to the city centre in the proposed modifications remains unchanged.
2. Hickson Road as a Boulevard	<i>To promote the scale of Hickson Road as a grand boulevard, buildings are to provide a consistent street wall and form to Hickson Road and Globe Street and use a palette of consistent and natural materials that are complementary to the sandstone nature of the headland.</i>	<i>To promote the scale of Hickson Road as a grand boulevard, buildings are to provide a consistent street wall and form to Hickson Road and use a palette of consistent and natural materials that are complementary to the sandstone nature of the headland.</i>	CHANGED This principle has been changed through the deletion of the requirement for a consistent street wall and form to Globe Street.
3. Buildings to Define Streets	<i>To define the public space of the street, all building façades are to be set to the street alignment with respect to the differing characters, scales and activation of the streets.</i>	<i>To define the public space of the street, all building façades are to be set to the street alignment with respect to the differing characters, scales and activation of the street.</i>	UNCHANGED The principle of defining the public space through building alignment in the proposed modifications remains unchanged. The street alignments themselves are significantly altered from the previous approval.
4. Low Scale Valley (previous principle)	<i>To promote built form of a human scale along pedestrian lanes, to encourage diversity in open space uses and to allow midday sun penetration within more dense blocks, mid-block</i>	–	CHANGED This previous principle has not been adopted for the proposed modifications. Rather, the following principle of north-south pedestrian connections (below) supersedes this.

	APPROVED CONCEPT PLAN	PROPOSED MODIFICATIONS	COMMENTS (By Urbis)
	<i>buildings are to be limited to 4-5 storeys in height and are to provide accessible roof top open space. This enables the formation of an accessible roof valley.</i>		<p>The only justification for departing from this originally approved principle is to accommodate large floor plates necessary to meet tenant requirements (Barangaroo Modification Report 2008, p 56).</p> <p>The departure from this 'low scale valley' principle is driven by the desire to increase floor plates and consequently, gross floor area.</p>
4. North South Pedestrian Connection (proposed new principle)	<i>To promote pedestrian connectivity and to encourage diversity in open space uses and to allow midday sun penetration within more dense blocks. On Blocks 2 to 5 a continuous mid block pedestrian connection at ground level which is not less than 20m wide is a minimum of 7 storeys high (not less than 50% open to the sky).</i>	<i>To provide for greater pedestrian permeability through the blocks (north-south and east-west) which relate to pedestrian desire lines. On Blocks 2 to 4 a continuous mid-block pedestrian connection at ground level which is not less than 4m wide and not less than 50% open to the sky.</i>	<p>CHANGED</p> <p>The built form principle for north-south pedestrian connections has been significantly altered from that proposed originally. The proposed modification provides the principle that ground level pedestrian connections are to be no less than 4m wide on Blocks 2-4, whereas the principle initially provided for ground level pedestrian connections no less than 20m wide.</p> <p>The 16m reduction of ground level pedestrian connections will reduce public space available for activation and will seriously impact upon the quality of these public spaces. There is no clear rationale behind this numerical reduction. The impacts of this change will be further assessed under Section 4.2.2 of this submission.</p>
5. Tapering Built Form	<i>To continue a built form dialogue with the adjoining city, building heights across the site are to generally taper towards the north, with the highest forms concentrated in the block in front of Napoleon Street.</i>	<i>To continue a built form dialogue with the adjoining city, building heights across the site are in keeping with the rest of the city, with the highest form at the centre of the scheme.</i>	<p>CHANGED</p> <p>The original built form principle of tapering building heights towards the north of the site has been changed by tapering heights from the centre (Block 3).</p> <p>The principle to "continue a built form dialogue with the adjoining city" has been retained in the revised principle; however the revised scheme does not achieve this principle. The height of Block 1 (RL 80) reflects the predominant scale of adjoining buildings to the south. However, the proximity of Block 2 at RL</p>

	APPROVED CONCEPT PLAN	PROPOSED MODIFICATIONS	COMMENTS (By Urbis)
			180, in combination with its significant length of 90m provides a significant departure from prevailing heights, and does not provide a respectful interface or built form transition at the southern boundary.
6. Open Space Within Blocks	<i>To create hollow blocks permeated with open space, courtyards, walkways and gardens, the central band of the accessible roof valley interrelate with the ground plane and intermediate levels.</i>	<i>To create hollow blocks permeated with open space, courtyards, walkways and gardens, the central band of the accessible podium roof interrelate with the ground plane and intermediate levels.</i>	UNCHANGED This principle has been significantly eroded as the blocks have become more rectilinear in configuration with minimal contained courtyard space and poor urban granularity
7. View Sharing	<i>To promote the equitable access to views towards the harbour, the built form is to be arranged to define the street corridors and to allow view corridors from the existing private buildings to the east.</i>	<i>To promote the equitable access to views towards the harbour, the built form is to be arranged to define the street corridors and to allow view corridors from the existing private buildings to the east.</i>	UNCHANGED The principle of view sharing as defined by the original Concept Plan is replicated in principle of view sharing in the proposed modification. However, as detailed in Section 4.1.2 of this submission, Block 1 modifications do not promote equitable access to Harbour views.
8. Orientation of Buildings	<i>To provide optimum orientation and transparency across the site and to create a silhouette of slender towers to Globe Street and the waterfront – the long façades of tower forms are to be oriented to the north. However, on Hickson Road, to define the linear nature of this road, the long façades are to be generally orientated to the east.</i>	<i>To provide optimum orientation and transparency across the site and to create a silhouette of slender towers to Globe Street and the waterfront – the long façades of tower forms are to be oriented to the north. However, on Hickson Road, to define the linear nature of this road, the long façades are to be generally orientated to the east.</i>	UNCHANGED The principle of orienting narrower sides of buildings towards the waterfront and longer sides to the north in the proposed modifications remain unchanged.

As deduced from Table 3, the following built form principles originally approved under the Concept Plan have been significantly redefined, or removed in entirety, to suit the proposed design modification:

- Principle 2: Hickson Road as Boulevard – changed as a result of revised form and function of Globe Street thus removing height and set-back principles.

- Principle 4: Low Scale Valley – removed and replaced with north south pedestrian connection principle thus removing urban granularity.
- Principle 4: North South Pedestrian Connection – replaces previous principle and introduces a reduction in the minimum width of ground floor pedestrian connections thus significantly diluting the quality of the intra-block public linkages north to south.
- Principle 5: Tapering Built Form – changed to provide for tallest building elements in the centre of Barangaroo South, not adjacent to Napoleon Street thus eroding the strength of the previous urban outcome.
- Principle 6: Open Space within Blocks- significantly eroded as the blocks have become more rectilinear in configuration with minimal contained courtyard space and poor urban granularity

3.2 Analysis of Approved and Proposed Built Form Principles

3.2.1 Design Philosophy

A significant amount of analysis was undertaken to formulate the built form principles as contained in the Barangaroo Modification Report (June 2008). These built form principles underpinned the approved Concept Plan. However in response to design changes to the Concept Plan, the proposed built form principles appear to have been revised subsequently and without appropriate analysis or justification for the departure.

This is not an ideal outcome, as it suggests that the proposed modifications have not been appropriately developed through urban design principles. Rather, the preferred scheme has driven the wording of the revised principles. This is highlighted through:

- Reference to the removal of the requirement for a consistent street wall along Globe Street as being 'in response to' the revised concept design (Environmental Assessment Report 2010, p 54).
- Reference to the 'refinement' of the 'tapering built form' principle upon redesign of the Concept Plan to ensure the tallest buildings are located within the centre of Barangaroo South and not adjacent to Napoleon Street (Environmental Assessment Report 2010, p 55).
- The statement that "Lend Lease has refined the controls in response to the revised urban structure, and other proposed modifications to the scheme" (Environmental Assessment Report 2010, p 54), rather than the modified scheme being informed by key design principle changes.

The approach undertaken to arrive at the modifications proposal appears to be a reactive, rather than a proactive approach to design. Consequently, there is no clear design rationale underpinning the new design modifications. There is inadequate justification as to why the impacts on important buildings and spaces directly adjoining the southern boundary of the site are necessary and/or warranted.

3.2.2 Lack of Public Benefit

The current modification proposal identifies benefits to the revised scheme (Revised Preliminary Environmental Assessment, June 2010, p 2). These stated benefits have been assessed against the proposed modifications in Table 4 and identify areas where the proposed modifications result in impacts that are not beneficial to the public interest.

Table 4 – Assessment of Stated Benefits of the Revised Scheme

REVISED SCHEME STATED BENEFITS	COMPARISON WITH APPROVED CONCEPT PLAN	COMPLIANCE
Applicant	Urbis Comments	Urbis Comments
<i>Increase the activation of the public domain</i>	<ul style="list-style-type: none"> The proposed modifications seek to reduce the foreshore promenade from 60m to 27m. Additional overshadowing is proposed on the foreshore promenade as a result of the hotel addition. 	<ul style="list-style-type: none"> Activation of the public domain may not be realised to its full potential due to the poor quality of experience for users, resulting primarily from overshadowing of public domain. The changed road network will result in an inequitable concentration of both heavy and light vehicular traffic concentrated along Shelley Street and Lime Street as the main access routes to the site from the south. This will diminish the pedestrian amenity along these streets immeasurably, these currently accommodate a number of significant 'headquarter' buildings with associated high levels of pedestrian activity.
<i>Ensure the provision of high quality and appropriately scaled public places, particularly with respect to the width of the foreshore promenade and the configuration of spaces between the commercial buildings</i>	<ul style="list-style-type: none"> Appropriate scale of public spaces such as the internal streets (pedestrian only) ideally 1:1. Most streets are narrower than this, establishing taller street walls to the width of streets. Foreshore promenade reduced in width from 60m to 27m (minimums). Spaces between buildings are minimal; having been reduced from 20m to 4m minimum widths. Combined with this, the proposed modifications generate increased self-shadowing primarily as a result of the new hotel addition. 	<ul style="list-style-type: none"> The proposal does not provide for high quality public spaces, as the amenity of users of the public domain will be reduced by the constant overshadowing of buildings onto internal streets and open spaces particularly during winter months. Narrow internal pedestrian streets in between buildings are proposed, and the foreshore promenade has been significantly reduced.
<i>Improve the mix of uses by increasing the amount of residential and community/public uses integrated into the core commercial precinct thereby encouraging greater activation for longer</i>	<ul style="list-style-type: none"> Greater activity during longer periods of the day and weekend can occur by increasing residential uses. 	<ul style="list-style-type: none"> Mix has been improved, as residential uses have been increased, as well as community uses (eg. Cultural Centre to the east of the hotel addition). However, based on the indicative design (ground level), the hotel addition is illustrated

REVISED SCHEME STATED BENEFITS	COMPARISON WITH APPROVED CONCEPT PLAN	COMPLIANCE
<i>periods of the day and at weekends</i>		as 'cultural', which is misleading as a majority of the hotel will be a private use with no public benefit.
<i>Improve public amenity and views to and from within the development, maximise solar penetration to public places, minimise wind impacts and maximise views to and from the CBD and the water along the Margaret Street alignment</i>	<ul style="list-style-type: none"> ▪ Greater extent of overshadowing particularly along the western foreshore promenade. ▪ The proposed modifications generate increased self-shadowing primarily as a result of the new hotel addition. From 1pm-4pm public domain will be constantly in shadow: <ul style="list-style-type: none"> – Foreshore promenade from 1pm-2pm. – Internal streets particularly Globe Street from 1pm-4pm. ▪ The impacts are in addition to the approved scheme which permits constant overshadowing of internal streets (pedestrian connections) from 9am-4pm during the Winter Solstice. This is not a desirable outcome for public spaces and reduces the quality of these spaces. 	<ul style="list-style-type: none"> ▪ Overshadowing impacts as a result of the proposed modifications do not achieve this stated benefit. ▪ Shadow impacts particularly on southerly adjoining properties and on the public domain within Barangaroo South itself have increased. ▪ Constant overshadowing of internal streets during winter in Barangaroo South will not achieve or improve public amenity.
<i>Separate vehicles and pedestrians along the waterfront promenade to ensure that a high quality experience, similar to that of East Circular Quay, is achieved</i>	<ul style="list-style-type: none"> ▪ Vehicular access is required to service the landmark building, as such; this entry area to the hotel is proposed to be a shared pedestrian and vehicular zone. 	<ul style="list-style-type: none"> ▪ This can be achieved by implementing a shared zone, as suggested in the Environmental Assessment Report 2010, to avoid the potential for conflicting traffic flows.
<i>Provide a public waterfront space that is appropriately scaled to ensure activation and enjoyment of the space</i>	<ul style="list-style-type: none"> ▪ The current proposal for modifications seeks to reduce the foreshore promenade from 60m to 27m in width. ▪ The scale of the hotel as a 'public waterfront space' is not appropriately scaled, given the extent of self shadowing it imposes upon the public foreshore of Barangaroo South, as well as contributing to overshadowing impacts on southern adjoining properties. 	<ul style="list-style-type: none"> ▪ A reduction in the width of the foreshore will decrease the amount of usable public space along the foreshore in Barangaroo South and therefore its attractiveness to visitors. ▪ The reduction in the width of the promenade to align with the width of the King Street Wharf promenade is inappropriate for the site, given the significant quantum of floor space,

REVISED SCHEME STATED BENEFITS	COMPARISON WITH APPROVED CONCEPT PLAN	COMPLIANCE
		building height and level of activity proposed to be concentrated on the site, in comparison to the substantially lower density and height of buildings along the King Street Wharf retail precinct.
<i>Provide appropriately scaled retail space at the ground plane to ensure activation, with residential above to provide visual security</i>	<ul style="list-style-type: none"> Significant quantum of ground floor retail provisions with commercial tenancies addressing internal public squares (eg. at the ground floor intersect of Block 2 buildings). 	<ul style="list-style-type: none"> Additional retail space has been provided, with residential above to provide activation and passive visual security.

By comparing the stated benefits of the revised scheme against a detailed examination of the proposed Concept Plan, Table 4 demonstrates that the proposal does not achieve all its stated public benefits.

3.2.3 Impacts of Proposed Built Form Principles

The proposed changes to the revised built form principles generate key areas of concern. These relate specifically to the failure of the revised scheme to achieve the claimed improvement in public benefit and the lack of justification for the enlarged commercial floor plates- particularly associated with Block 2.

In respect to the revised scheme's claimed improvement in public benefits, we note:

- The changed road network will diminish the pedestrian amenity along these adjoining southern streets, which currently accommodates a number of significant 'headquarter' buildings, retail and residential activities and associated high levels of pedestrian activity. This is inequitable at best.
- The proposal does not provide for high quality public spaces, as the user amenity of the public domain will be reduced by constant overshadowing of buildings onto internal streets and spaces particularly during winter.
- Combined with this is the narrowing of internal pedestrian streets.
- A reduction in the width of the foreshore will decrease the amount of usable public space along the foreshore in Barangaroo South, and is insufficient relative to the quantum of floor space, building height and level of activity proposed to be concentrated on the site.

In respect to the enlarged commercial floor plates, we note:

- The commercial floor space associated with the original Concept Plan was significantly increased as a result of Modification No.2 in order to "*to provide greater flexibility for accommodating larger floor plates per market demand*". This anticipated floor plates of approximately 25m x 55m.
- The floor plates provided in the proposed Concept Plan Modification of Blocks 2 and 3 identify tower floor plates of almost double the previous dimension, being 25m x 90m. Justification for the increased floor plates is provided in the revised EA, but only states that the opportunity for "*large A-grade floor plate commercial buildings that are in high demand and difficult to achieve within the existing city footprint*" (Revised EA, JBA p 9)".
- No detailed justification is provided against the detailed work done by DEGW, nor has their been any comment on the feasibility of these particular dimensions from an operational view-point.

4 Impacts

The proposed modifications will inevitably have impacts on surrounding land. This section details the impacts of the proposed modifications on adjoining buildings and spaces to the south, as well as impacts internal to the Barangaroo South site. The degree of these impacts is then assessed against the impacts already approved under the Concept Plan.

Given the statutory requirement for the applicant to address the applicable Director General's Requirements (2 July 2010), we assume the impacts raised in this submission will be closely considered.

4.1 Direct Impacts to Southern Adjoining Buildings

As a result of the proposed modifications, the adjoining buildings to the south of Barangaroo South will experience the following :

- Impacts as a result of **overshadowing** of buildings in Barangaroo South.
- Impacts that reduce the quantity and quality of **views and outlook** to the Harbour.
- Impacts due to localised concentration of traffic as a result of proposed changes to **access and movement** patterns.

The particulars of these impacts are analysed as follows.

4.1.1 Overshadowing


Adjoining buildings to the south of Barangaroo South are all affected by additional overshadowing impacts from the proposed modifications to varying degrees. The major source of additional overshadowing impacts stems from the hotel addition (Block Y). The additional overshadowing impacts generated by the proposed modifications are illustrated in the Shadow Study accompanying the current Concept Plan amendment.

A matrix of the proposed overshadowing impacts on Macquarie Bank building, KPMG Tower, King Street Wharf retail precinct and AMEX House between 9am-4pm (Table 5) has been investigated at 21 June (Winter Solstice), during which time the longest shadows are cast. Table 5 also details the location and the degree of impact the additional shadows will generate on the adjoining southern buildings and spaces.

Table 5 – Overshadowing Impacts of Revised Scheme (21 June)

SHADOW IMPACTS (June 21)									
	9am	9:30am	10am	11am	12pm	1pm	2pm	3pm	4pm
Macq Bank	Minor additional shadow on northern portion	Minor additional shadow on northern half of building	Minor additional shadow on northern half of building	Approved concept plan shadows whole building No additional shadow	Approved concept plan shadows whole building No additional shadow	Minor additional shadow on western side of building, and adjoining portion of Lime Street.	Additional shadow on western side of building, and adjoining portion of Lime Street.	Additional shadow on western side of building	Additional shadow on western side of building
KPMG Tower	No shadow	Minor additional shadow at north-western corner	Minor additional shadow at north-western corner	Minor additional shadow at northern half of building	Approved concept plan shadows majority of building. Additional shadow brings whole building under shadow.	Approved concept plan shadows whole building No additional shadow	Approved concept plan shadows whole building No additional shadow	Approved concept plan shadows whole building No additional shadow	Minor additional shadow at northern half of building – keeping whole building in shadow
King St Wharf Retail Precinct	Minor additional shadow on northern portion	Minor additional shadow on foreshore promenade	Minor additional shadow on foreshore promenade	Additional shadow on foreshore promenade and building	Additional shadow on northern side of Bungalow 8 and over buildings	Additional shadow over northern portion of waterfront promenade and buildings. Likely that shadowing will extend to 1:30pm	Minor shadow impacts on the precinct at north-eastern corner. Mainly shadow over Lime Street (north)	No shadow	No shadow
AMEX House	No shadow	No shadow	No shadow	Minor additional shadow at north-western portion	Approved concept plan shadows whole area No additional shadow	Approved concept plan shadows whole area No additional shadow	Approved concept plan shadows whole building No additional shadow	Additional shadow over building	Additional shadow over building – whereas approved concept plan proposed no shadows at this time.

 Minor additional shadow impacts

 Additional shadow impacts

Degree of Impacts

To Macquarie Bank Building

- As demonstrated in Table 5, new shadows will be cast over the Macquarie Bank building between 9am and 11am at the northern portion of the building.
- New shadows will be generated on the northern façade and western side of the building between 2pm and 5pm.
- In addition, the approved Concept Plan keeps the whole Macquarie Bank building under constant shadow between 11am to about 12:30pm.

To KPMG Tower

- The approved Concept Plan keeps the all the KPMG building under constant shadow from just after midday to 4pm. Additional shadows at midday and at 4pm will bring the entire building into shadow between midday and 4pm.
- Minor overshadowing impacts will occur between 9am and midday.

To AMEX House

- Between 3pm and 5pm new shadows will be cast over AMEX House, where the approved Concept Plan did not propose any.
- Minor additional overshadowing will be experienced between 11am and midday at the north-western portion of the building.

To King Street Wharf Retail Precinct

The most pertinent overshadowing impacts generated by the proposed addition will be over the King Street Wharf retail precinct. Additional shadow impacts will affect the retail precinct (including foreshore promenade) constantly from 9am to 3pm during winter. The impacts are summarised as:

- New shadows will be cast at the northern end of King Street Wharf from 12pm-2pm, generated by the newly proposed Blocks X and Y. This will result in new shadows over the foreshore promenade and associated western facing outdoor dining areas, over the northern facing outdoor dining area of Bungalow 8 and associated adjoining public walkway areas.
- Minor additional overshadowing impacts between 9am and 11am. At 11am, new shadows will be cast over the foreshore promenade of intermediate significance.
- In addition to the significant shadows already cast by the approved Concept Plan, the additionally proposed shadows over the King Street Wharf retail precinct will bring this area into shade constantly between 9am-3pm.

Consequences of Impacts

Macquarie Bank building, KPMG Tower, King Street Wharf retail precinct and AMEX House establish a concentration of commercial headquarters with ground floor café, restaurant and bar tenancies; most of which include external dining areas. Within this area, the focal point of outdoor dining and public domain activity is along the King Street Wharf retail precinct. This precinct is recognised as a major tourist attraction and leisure precinct for workers and visitors in the CBD.

The overshadowing impacts on the King Street Wharf retail precinct generated as a result of the proposed Concept Plan modifications will have detrimental impacts relating to the quality of the public domain particularly along the foreshore promenade. Upon a review of the proposed modifications application, the following key matters of concern are raised:

- Figure 6 – Site Opportunities (Environmental Assessment Report 2010, p 16) identifies a 'foreshore link' in green that extends to the King Street Wharf foreshore promenade. It is envisaged that the foreshore promenade along Barangaroo South will connect with the existing foreshore promenade to the south. This connection from Darling Harbour to Barangaroo South will provide an important

foreshore link, to which pedestrian amenity and quality of experience should not be compromised. Additional overshadowing impacts are contrary to improving the quality of the public domain and reinforcing this promenade link extending from Barangaroo South to King Street Wharf.

- The Environmental Assessment Report (2010, p 107) states “the **additional ‘potential’ shadowing** to the south is **over commercial buildings within the King Street Wharf precinct**, with some apparent additional shadowing of the Portside Residential Towers” (emphasis added):
 - The shadow study accompanying the proposed modifications application illustrates not just ‘potential’ but real and substantial additional shadow impacts over commercial buildings as well as the foreshore promenade along King Street Wharf.
 - The only justification provided for this additional shadowing is that there will not be substantial differences in the approved shadow impacts compared to the proposed shadow impacts, as it is noted “the shadowing resulting from the indicative layout generally falls within the approved Concept Plan shadows for this afternoon period” (Environmental Assessment Report 2010, p 107).
 - However, this justification discounts the consequences of the overshadowing impacts that occur during the busiest time of the day between 12pm-2pm. Visitors to Sydney and workers in the CBD ascend to either the cafés/restaurants offering outdoor dining, or to the foreshore promenade for lunch along King Street Wharf. Overshadowing during peak lunch time will reduce the quality of the public domain and therefore user amenity and experience. This is an inequitable outcome derived in the main through the imposition of the new hotel block on the harbours edge and in increased height envelopes generally.
 - The foreshore promenade is frequented for active recreational purposes. The overshadowing impacts on the foreshore promenade will reduce pedestrian amenity in this area, which is an important issue given the quantum of pedestrian usage (upwards of 3 million pedestrian movements annually) in the area that provides a vital connection from Darling Harbour to Barangaroo South.
- Reduced patronage, and hence economic impacts to these areas is likely to occur if the quality of pedestrian amenity on offer is diminished. King Street Wharf retail tenancies provide a high level of amenity through outdoor dining space fronting the Harbour. However, this will be compromised if the greatest extent of overshadowing impacts is experienced constantly between 9am-3pm in winter.
- Additional overshadowing of Lime Street from 1pm -2pm during winter will further reduce the quality of the public domain in this area.

The additional shadows will have a significant impact to the adjoining buildings to the south, particularly along the King Street Wharf foreshore promenade. The impacts of the additional shadows are compounded when placed in the context of the shadow impacts already generated by the approved Concept Plan. In particular:

- Macquarie Bank building and adjoining public plaza space – is constantly affected to varying degrees by overshadowing between 9am-5pm by buildings in Barangaroo South. The Macquarie Bank building will be in complete shadow from 11am to approximately 12:30pm.
- KPMG Tower and adjoining public space – is constantly affected to varying degrees by overshadowing between 9:30am-5pm by buildings in Barangaroo South. The KPMG Tower will be in complete shadow from midday to 5pm.
- King Street Wharf retail precinct – is constantly affected to varying degrees by overshadowing between 9am-3pm by buildings in Barangaroo South.
- AMEX House – is entirely in shadow between midday and 3pm under the approved Concept Plan. The proposed modifications will generate additional overshadowing over AMEX House, which will extend the length of time the building is in shadow from 11am-5pm.

4.1.2 View and Outlook Loss

Whilst it is acknowledged that development in the context of Sydney's CBD will inevitably have visual impacts, the degree of these impacts needs to be assessed to determine the reasonableness of these impacts. The principles of view sharing as contained in *Tenacity Consulting v Warringah [2004] NSWLEC 140* follows that:

- The first step is to assess the views to be affected.
- The second step is to consider from what part of the property the views are obtained.
- The third step is to assess the extent of the impact.
- The fourth step is to assess the reasonableness of the proposal that is causing the impact.

These key considerations form the structure to assessing view impacts experienced by southern adjoining buildings; particularly KPMG Tower and Macquarie Bank building.

The key sources of view and outlook loss from KPMG Tower and Macquarie Bank building are from:

- Block 1: height increase from RL 62 to RL 80 represents an increase in 18m.
- Block 2: significantly longer floor plates to that approved under the Concept Plan obstructs views to the harbour.

Degree of Impacts

Important 'local views' from buildings to the harbour identified by the Darling Harbour Wharves Site Study (Hill Thalys, 2005) are illustrated as linear views, rather than oblique or panoramic views. Whilst it is unrealistic to expect all oblique or panoramic views to the Harbour to be protected, the proposal results in the complete obstruction of all oblique views from KPMG Tower, which is contrary to the built form principle (no. 7) promoting equitable view sharing. Notwithstanding the above, as a result of the proposed modifications, linear (ie. direct) views to the harbour currently afforded by KPMG Tower will be reduced. The outlook quality from KPMG Tower and Macquarie Bank building will also be diminished.

The 3D model prepared as part of the public exhibition process of the proposed modifications application was inspected at the Department of Planning office. The following analysis and supporting photos of the 3D model illustrates the impact that the modifications impose on southern adjoining buildings.

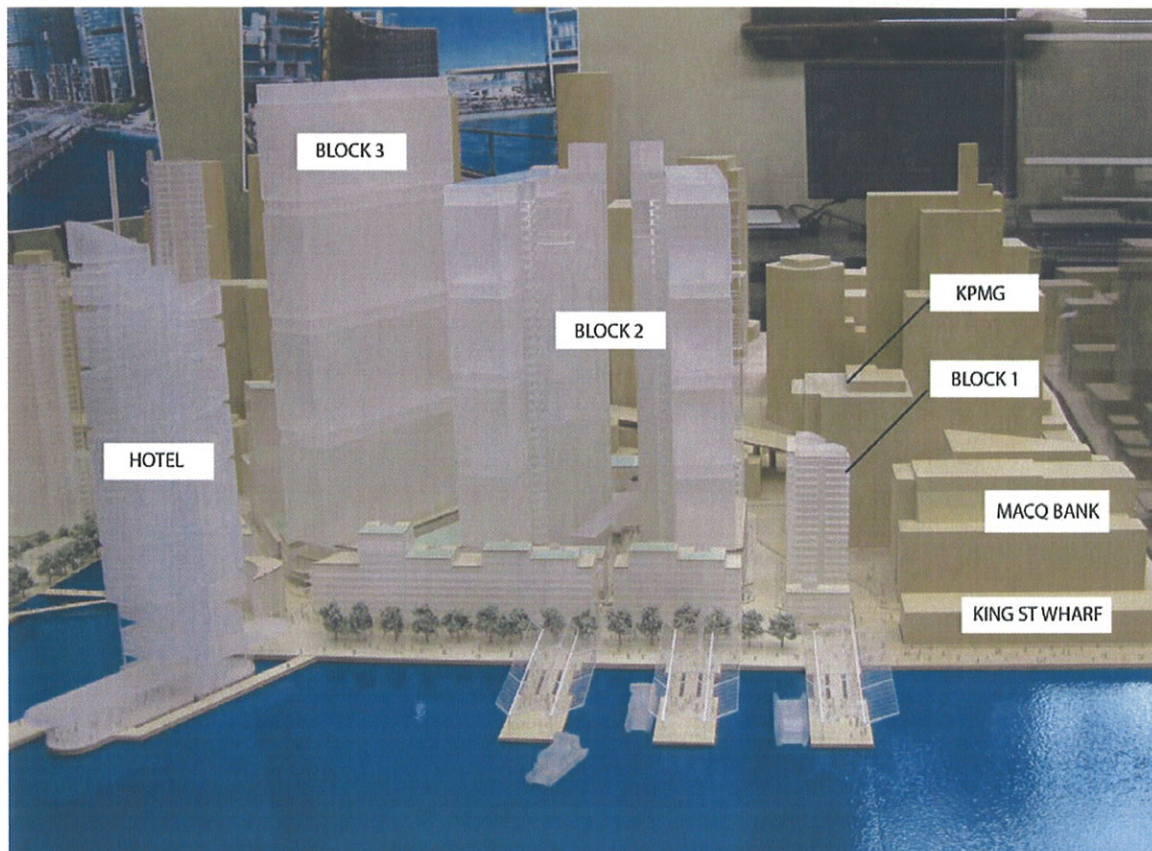
View Impacts Generated by Block 1

The view to be affected is recognised as a highly valuable view to Sydney Harbour. Linear views to the Harbour are currently afforded from the northern and western sides of the KPMG Tower. Under the approved Concept Plan, Block 1 impedes on linear views currently afforded from the western side of KPMG Tower (northern portion of the building). A small gap through Macquarie Bank building and Block 1 to the Harbour will remain. The proposed modifications to Block 1 as shown in Figure 1 will generate the following impacts:

- In addition to the view loss from KPMG Tower by the approved Block 1 (RL 62), the proposed additional height of 18m to Block 1 will eliminate views from 6 additional storeys of KPMG (based on 18m addition, and 3m [minimum standard] floor to floor height of residential uses).
- Block 1 impedes on the panoramic views currently afforded from the northern side of KPMG Tower. However, it is noted that retention of these panoramic views to the Harbour is unrealistic in this context.

- Block 1 impedes on the panoramic views currently afforded from Macquarie Bank building. While it is noted that retention of these panoramic views to the Harbour is unrealistic, it is reasonable to expect the protection of quality of outlook. The quality of the northern outlook from Macquarie Bank building will be reduced as a result of the amended built form principle (no. 4) that reduces minimum internal street widths from 20m to 4m. Wider street widths provide greater visual relief of the built form, and promote view protection and quality in visual outlook.

Figure 1 – View Impacts Generated by Block 1



As such, the extent of impacts to views and quality of outlook as a result of Block 1 modification are:

- A significant loss of linear views to the harbour from KPMG Tower; at a minimum (vertically) it will lose approximately 6 storeys of direct harbour views as a result of the Block 1 height increase. Horizontally along KPMG Tower's western side (from the north), the extent of view loss will be almost half the width of the building.
- A significant reduction in the quality of outlook from Macquarie Bank as a result of the proposed change to upper storeys from commercial to residential uses.

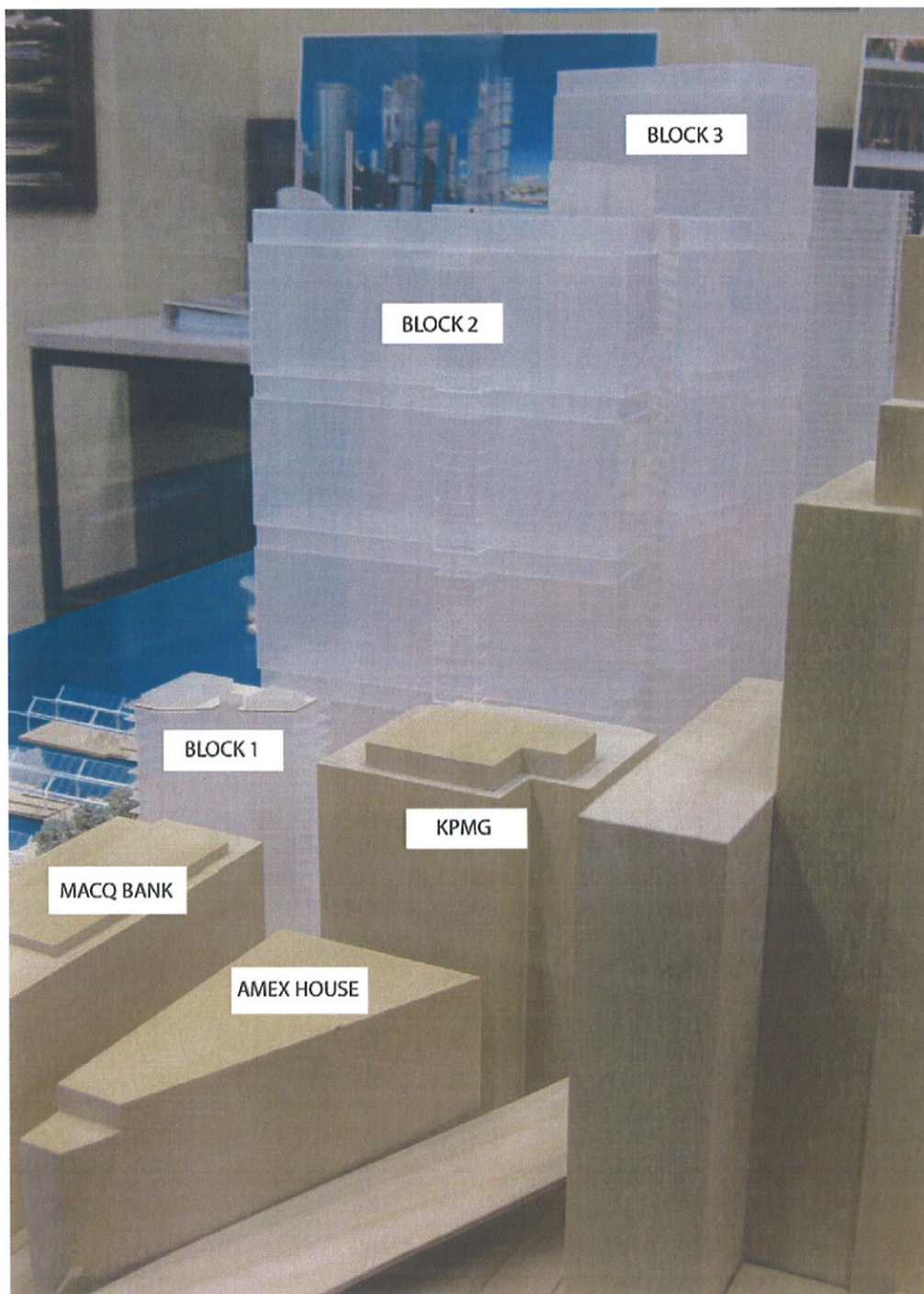
These impacts generated by Block 1 are considered unreasonable, given the impacts that the approved Concept Plan already impose on adjoining buildings. These impacts are primarily generated by the approved location of Block 1 in the direct view line to the Harbour from KPMG Tower.

View Impacts Generated by Block 2

The length of Block 2 at 90m in length (east-west) poses a significant departure from the shorter building footprints of the approved Concept Plan, uninterrupted blocks of these lengths are unprecedented in the Sydney CBD. As a result of this modification, the following visual impacts as shown in Figure 2 are generated:

- Block 2 impedes on the panoramic views currently afforded from the northern side of KPMG Tower. While it is noted that retention of panoramic views to the Harbour is unrealistic, it is reasonable to expect the protection of quality of outlook.
- The quality of outlook primarily from KPMG Tower and to a lesser extent, Macquarie Bank building, will be reduced as a result of the significant, uninterrupted length of Block 2 and the removal of the north/south 'valley' in the previous design principles.

Figure 2 – View Impacts Generated by Block 2



Consequences of Impacts

Loss of Harbour Views

The applicant's Visual Impact Analysis (August 2010, p 41) states that "the zone of potential private view impacts to existing buildings within the King Street Wharf precinct principally affect the north facing elevations of those buildings only, relating to views to the north and partially to the north-west". There is no mention of the significant visual impacts to KPMG Tower or Macquarie Bank building.

The Visual Impact Analysis (August 2010, 16) further states that "higher density development is to be focussed towards the southern end of the site, linking into existing higher density development at King Street Wharf and the western edge of the CBD", however, this statement raises the following matters of contention:

- Consideration needs to be given to the fact that King Street Wharf, Macquarie Bank, KPMG Tower and the AMEX building are of a significantly lower density and height when compared to buildings in central CBD, and those proposed in Barangaroo South.
- Contrary to the view sharing principle, these modifications do not promote the equitable access to views to the Harbour, as the maximisation of development potential through additional height on Block 1 is being achieved to the detriment of views afforded by adjoining buildings.

Reduced Quality of Outlook

In addition to the loss of direct views from KPMG Tower, the consequences of the reduced quality of the northern outlook as a result of proposed Block 1 modifications are as follows:

- Block 1 is designed to address the new road extension Margaret Street West. As such, Macquarie Bank building will have outlook onto the rear of Block 1.
- Block 1 was previously proposed as a commercial building, of a similar commercial typology to the adjoining Macquarie Bank building. The current modification seeks approval to alter the upper storeys to residential apartment uses. Transition issues from the commercial typology of Macquarie Bank building to the predominantly residential Block 1 typology may arise. The southern interface of Barangaroo South must be carefully managed through urban design controls. The revised urban design controls for Block 1 (Environmental Assessment Report 2010, p 55) do not address this southern façade.
- Potential impacts may result on asset values from the proximity and direct outlook onto residential apartments from Macquarie Bank building. The detailed design of Block 1 will result in direct outlook from Macquarie Bank building to residential balconies, windows, a blank façade, or a combination of the aforementioned. In any case, this is an undesirable outcome.

The consequences of the reduced quality of the northern outlook as a result of the modified length of Block 2 are as follows:

- The 90m length of Block 2 will impose upon the northern outlook of KPMG Tower and Macquarie Bank building a considerable bulk and mass, with no visual or physical relief or interest in the built form.
- Combined with the length of Block 2, the proposed height of RL 180 (unchanged from Concept Plan approval) will result in a poor visual outlook from the affected southern buildings.
- The significant and unjustified increase to the length of Block 2 (from approximately 55m based on the MOD 2 Concept Plan to 90m as currently proposed) to an unchanged building height of RL 180 in no way respects or responds to the immediate building context of the southern adjoining buildings forming the King Street Wharf Precinct.

4.1.3 Access and Movement

The proposed modifications seek to alter the physical and operational street network internal to Barangaroo South. Within the Barangaroo Modification Report (June 2008, Section 7.3.3, p 59), the principle for east-west connections states:

"Provide for east-west physical linkages and visual connections (streets and midblock connections where possible)".

As illustrated in Figure 4, the original Concept Plan reinforced physical east-west linkages through new streets. However, Figure 4 illustrates a departure from this principle. Instead, east-west streets (Napoleon Street, Bull Street and Healy Street) linking Hickson Road with new Globe Street have been removed and replaced with pedestrian connections. The only vehicular road in Barangaroo South is now the re-aligned Globe Street that runs north-south and connects to Hickson Road (shown in orange in Figure 4).

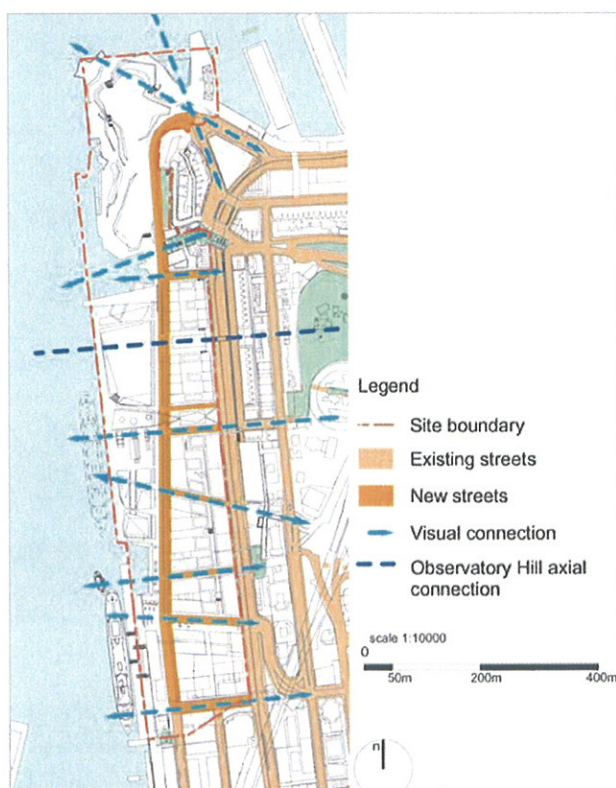


Figure 3 – Approved Concept Plan: Street Connections (East Darling Harbour SSS Proposal 2006, p 56)

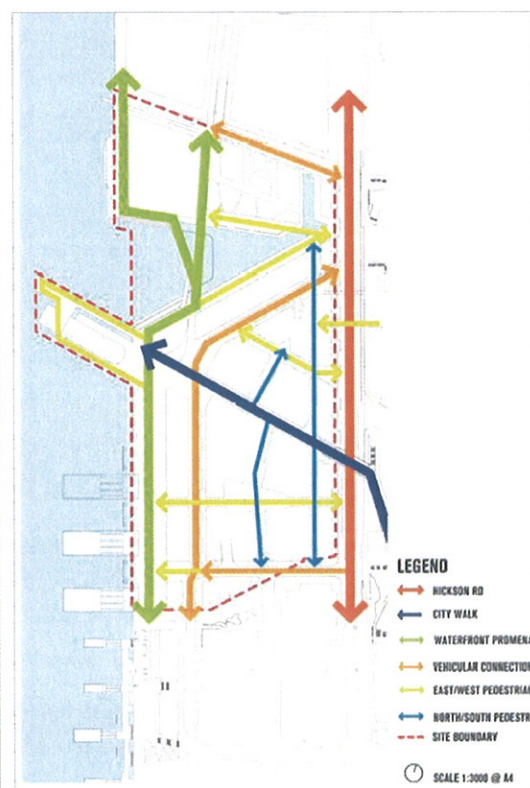


Figure 4 – Proposed Modification: Street Connections (EA Report 2010, p 63)

As a result of the proposed modifications, the loss of accessibility to Barangaroo South from Hickson Road is likely to concentrate vehicular traffic onto Shelley Street, which will form the new Margaret Street West. Vehicular traffic is also likely to be funnelled through Lime Street, as the new Globe Street will be an extension of Lime Street. The result of this will reduce pedestrian amenity of Shelley Street and Lime Street.

Degree of Impacts

Changes to Traffic Movement

The redirection of vehicular movement through Shelley Street and Lime Street will significantly reduce pedestrian amenity along these streets. Based on traffic generation modelling of the proposed modification (Traffic Management and Accessibility Plan 2010, p 21), a comparison of vehicle trips per hour at peak times (am/pm) under the approved Concept Plan and proposed modifications are shown in Table 6.

Table 6 – Comparison of Total Vehicle Trips

	APPROVED CONCEPT PLAN	PROPOSED MODIFICATION
Total additional traffic (am)	608	614
Total additional traffic (pm)	751	736

There will be a slight increase in traffic from 608 to 614 total vehicle trips during peak hour. The reduced additional traffic (pm) based on the proposed modifications can be accounted for, by the significantly reduced number of hotel rooms (730 under approved Concept Plan, compared to 249 rooms under the proposed modifications). However, it is noted that residential dwellings have increased from 750 under the approved Concept Plan to 1166 dwellings under the latest modifications.

Despite these nominal additions to traffic generation, the removal of east-west vehicular streets from Hickson Road network will redirect the high volume of traffic generated by Barangaroo South onto Shelley and Lime Street as the main connection routes to the site from the south.

Car Parking

As a result of the proposed modifications to the approved Concept Plan (ie. an increase in 59,965sqm of gross floor area), a total increase in 244 parking spaces is proposed (Transport Management and Accessibility Plan – Supplementary Report, ARUP).

Proposed of Excavation and Basement Car Parking

Excavation and basement car parking works proposed under MP10_0023 will further exacerbate the impacts to pedestrian amenity specifically along Shelley Street. Under application MP10_0023, proposed works on Shelley Street involve:

- The siting of the major loading bay facility and its access off the new Margaret Street West (existing east-west section of Shelley Street) directly adjoining Macquarie Bank building and KPMG Tower.
- The major loading dock will be a shared facility for garbage compactors, trucks and other service delivery vehicles.

Consequences of Impacts

Proposed changes to traffic movements within Barangaroo South will inevitably impact upon adjoining areas, particularly the street network to the south. The removal of two of the four previously approved east-west vehicular links between Globe Street and Hickson Road will reduce the accessibility of the site. The current scheme proposes only two east-west vehicular links connecting to Hickson Road.

Consequently, vehicular traffic of up to 614 vehicles per hour during peak morning, and 736 vehicles per hour during peak afternoon is likely to be funnelled through Shelley Street as an alternative route connecting to Hickson Road.

Compounded with the proposed changes to traffic movements and increase in the quantum of car parking, the proposed excavation and basement car parking works of application MP10_0023 raises the following adverse impacts to pedestrian amenity along Shelley Street:

- Significantly reduced quality of the public domain through the introduction of light vehicles being redirected through existing east-west portion of Shelley Street, combined with heavy servicing vehicles accessing loading bay facility with associated air quality and odour impacts.
- Reduction in the vibrancy and activation of the streetscape as a result of reduced pedestrian amenity, which is contrary to the stated benefits of the revised scheme that claims it increases the activation of the public domain (dot point 1).
- The Environmental Assessment Report (2010, p 44 and 106) identifies the new Margaret Street West, as an extension to the existing east-west portion of Shelley Street as a major visual connection. This is likely to be eroded as a result of light and heavy vehicle traffic movements, combined with access to a loading bay facility that will significantly disrupt the built form continuity of the streetscape.

The appropriate reduction and management of traffic related impacts as discussed above is vitally important for the King Street Wharf Precinct. This is especially the case given:

- The status and associated amenity expectations of various key headquarter buildings in this area.
- The public spaces and plazas around those buildings that accommodate high volumes of pedestrian movement, either directly associated with these buildings, or being a link between the King Street Wharf Precinct and the CBD.

4.2 Impacts Internal to Barangaroo South

All adjoining sites have vested interests in the success of Barangaroo South not only in its financial success, but also in its success as a high quality public destination for tourists, residents and workers in the CBD. As such, the quality of the public domain will require careful consideration in its design and impacts on the pedestrian experience.

Upon a review of the current modifications application, the following key issues internally affecting Barangaroo South have arisen:

- **Overshadowing** – resulting in poor amenity of the public foreshore and internal pedestrian streets
- **Reduced width of foreshore promenade and internal streets** – resulting in reduced useable space along the foreshore, and reduced quality of public domain within the internal pedestrian streets.
- **Changes to internal street network** – reduced passive surveillance as a result of removal of vehicular streets.

4.2.1 Overshadowing

Primarily as a result of the hotel addition (Block Y), the following shadow impacts will be experienced on the 21st June during the Winter Solstice:

- Significant shadows cast over the public domain in Barangaroo South continuously from 1pm-4pm. The greatest extent of overshadowing along foreshore promenade public domain is from 1pm-2pm. If approved, this will result in a poor outcome for users of the foreshore promenade as pedestrian amenity will be reduced through constant shadowing in the afternoon. It is likely that levels of activation of the foreshore promenade will be diminished as a result of the poor public domain quality.
- Constant overshadowing of internal streets at all times during the day, including additional self shadowing of the proposed Globe Street from 1pm-4pm. Afternoons will be in constant shadow.
- All pedestrian streets internal to Barangaroo South (predominantly within Blocks 2 and 3) will be constantly in shadow at all times of the day as a result of the shadows cast by existing buildings to the east, proposed increases to building heights on Blocks 3, 4B and 4C, and proposed new buildings (Blocks X and Y). This is not a desirable outcome, as:

- Public domain areas in constant shadow do not produce high amenity for pedestrian street activation, and are likely to reduce ground level activity.
- Ground floor retail proposed within Barangaroo South will be in constant shadow during winter, which will impact the amenity of public spaces relating to outdoor shopfront and café uses.
- This will not produce a comfortable environment conducive to pedestrian activity.

4.2.2 Reduced Width of Foreshore Promenade and Internal Streets

The proposed modifications seek approval to reduce the width of the foreshore promenade from 60m as a minimum width, to 27 as a minimum width. The reduction in 33m enables the former promenade area to accommodate the newly proposed Block X and matches the width of the King Street Wharf promenade. A 27m wide promenade is suitable for King Street Wharf, given the substantially lower density and height of buildings along the strip. However, the reduction in the width of the Barangaroo South promenade to align with the width of the King Street Wharf promenade is inappropriate for the site, given the significant quantum of floor space, building height and level of activity proposed to be concentrated on the site.

Based on the new built form Principle 4, the width of north-south pedestrian connections has been significantly altered from what was originally proposed. The proposed modification provides the principle that ground level pedestrian connections are to be no less than 4m wide on Blocks 2-4, whereas the principle initially provided for ground level pedestrian connections no less than 20m wide.

The reduction by 16m of ground level pedestrian connections will reduce public space available for activation. There is no clear rationale behind this numerical reduction. The impacts that are likely to occur from this relate to:

- Wind tunnelling impacts as a result of the compounded effects of proposed height increases to Blocks 1, 3, 4B and 4C. This is likely to generate wind tunnelling impacts that are undesirable for maximising pedestrian activity.
- The narrowing of pedestrian connections, which will limit the potential for ground floor activation through outdoor dining and café activities.

4.2.3 Changes to Internal Street Network

The removal of east-west vehicular connections off Hickson Road, to be replaced with pedestrianised streets will have impacts on the quality of the public domain internal to Barangaroo South; in particular Crime Prevention through Environmental Design (CPTED).

Crime and safety issues as a result of the removal of vehicular streets will reduce passive surveillance of the public domain particularly within the pedestrian plazas and arcades of Blocks 2 and 3 that will not be activated 24 hours a day. The reduction of vehicular traffic through the site will reduce the level of passive surveillance.

5 Recommendations

The conclusions and recommendations of this submission have been informed by a review and analysis of the relevant documentation supporting the Barangaroo South Concept Plan Modification and Major Development SEPP Amendment (MP06_0162 MOD4).

5.1 Summary of Impacts

5.1.1 Direct Impacts to Southern Adjoining Areas

The degree of the revised scheme's impacts have been analysed to determine its reasonableness. These direct impacts to the southern adjoining properties occupied by Macquarie Bank building, KPMG Tower, King Street Wharf retail precinct and AMEX House are summarised as:

As a result of the additional **overshadowing impacts** generated by the revised scheme:

- Macquarie Bank building will be constantly affected by overshadowing between 9am-5pm, and will be in complete shadow from 11am to approximately 12:30pm.
- KPMG Tower will be constantly affected by overshadowing between 9:30am-5pm, and will be in complete shadow from midday to 5pm.
- The proposed modifications will generate additional overshadowing over AMEX House, which will extend the length of time the building is in shadow by two hours (one in the morning and one in the afternoon).
- King Street Wharf retail precinct is constantly affected to varying degrees by overshadowing of Barangaroo South buildings (approved and proposed) between 9am-3pm. As a result of the proposed modifications, the new overshadowing impacts occurring during the busiest time of the day between 12pm and 2pm will:
 - Reduce retail patronage as a result of diminished quality of pedestrian amenity.
 - Further reduce the quality of the public domain as a result of additional overshadowing of Lime Street from 1pm -2pm during winter.

The **view impacts** generated by Blocks 1 and 2 are summarised as:

- The loss of direct views to the Harbour from the western side of KPMG Tower at the northern end that does not promote the equitable access of views.
- Reduction in the quality of the northern outlook for KPMG Tower and Macquarie Bank building through the proposed bulk and mass of Block 2 with no visual or physical relief in the built form.
- Reduction in the quality of northern outlook to for Macquarie Bank building to the residential apartments in Block 1.

Changes to the **access and movement** patterns will generated the following impacts:

- Significantly reduced quality of the public domain through the introduction of light vehicles being redirected through existing east-west portion of Shelley Street, combined with heavy servicing vehicles accessing loading bay facility with associated air quality and odour impacts.
- Reduction in the vibrancy and activation of the streetscape as a result of reduced pedestrian amenity.

5.1.2 Impacts Internal to Barangaroo South

As a result of the proposed modifications to the Concept Plan, the following key issues affecting Barangaroo South internally relate to:

- **Overshadowing** which creates poor user amenity along the public foreshore and internal pedestrian streets.
- **Reduced width of foreshore promenade and internal streets** that results in a reduced quantum of useable space along the foreshore, and reduced quality of public domain within the internal pedestrian streets.
- **Changes to internal street network** that reduces passive surveillance as a result of changing vehicular streets to pedestrian connections.

5.2 Submission Recommendations

The findings of this submission identify impacts in relation to the proposed Concept Plan modifications for Barangaroo South.

These impacts need to be addressed through further consideration and amendments to the Concept Plan before it is ultimately approved, in order to provide the ability and confidence that future Project Applications will be able to deliver a positive outcome for Barangaroo and the broader King Street Wharf Precinct.

This positive outcome will retain and drive value for all assets within the area, including Barangaroo itself, rather than negatively impacting on amenity, public experience and on the value of directly adjoining buildings and associated spaces.

The Department of Planning is requested to consider the issues and impacts contained within this submission, and in doing so:

- Refine the urban design principles for the site to inform the ultimate Concept Plan.
- Require the applicant to resubmit the Concept Plan for reconsideration.

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Mr Lee F. Du Bray
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13 September 2010

The Director, Government Land and Social Projects
Department of Planning
Level 34 Governor Macquarie Tower
SYDNEY NSW 2000

Attention: The Director

RE: Barangaroo Development – MP06_0162MOD 4

I am extremely concerned about the abovementioned development and how it will affect my current standard of living.

The height and bulk of the current proposal by Lend Lease will mean these proposed enormous towers will not only create a "wall" between our building and water but will create a "valley of shadow" for all buildings along this stretch of Kent St and Hickson Rd.

The concept of "view sharing" seems to have been completely ignored by Lend Lease and given these are our residential homes and we have been here for some 10 years, I would have thought some sensitivity could have been provided by both the Planning Department and the developers.

Not only that but the project has a life span of 15 years i.e completion date estimate is 2025

Please provide me with a similar scenario whereby local residents have had to put up with constant construction noise (including Saturdays), ensuing dust and pollution, snarled traffic, loss of light ...for a period of some 15 YEARS!!!!!!

Let alone the general outrage of being in such close and immediate proximity to some the ugliest and inappropriate buildings that have ever been conceived.

This is totally outrageous.

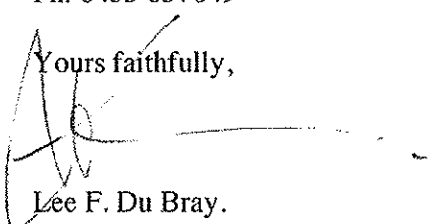
No thought has gone into to the ramifications to local residents and there is a groundswell of discontent about this monstrosity of a development. Barangaroo has been lauded by the Government as an amazing architectural paradise at the city's

doorstep, when in fact it is a dog's breakfast and about as wondrous as the last amazing inclusion to the city of Sydney's list of architectural and public facility achievements – the mighty awe inspiring monorail.

I urge you to meet with our "Stamford on Kent" Barangaroo discussion representative to try and negotiate an amicable and satisfactory outcome for all i.e.

Mr Paul Upham
Kent Street Residents Group
Ph: 0435 057649

Yours faithfully,



Lee F. Du Bray.

David Gibson - Objection to Development changes MP06-0162MOD 4

From: "Hobart Osteopathic Clinic" <mickerson3@iprimus.com.au>
To: <plan_comment@planning.nsw.gov.au>
Date: 12/09/2010 6:52 AM
Subject: Objection to Development changes MP06-0162MOD 4

ATT: The Director, Government Land and Social Projects

RE: MPO 0162 MOD 4

We are owners in a residential building on Kent St called Stamford on Kent consisting of 230 apartments with 2 stratas. Our building has been a residential block for 10 years. We are also strongly represented in the Kent St residents group and the Millers point residents action group, with a grouping of 4500 voters.

We strongly object to the new proposed modifications. Our main points of objection are

- . The increased height and placement of Block 4 which affects the views and amenity and outlook of 3 existing residential apartment buildings.
- . The overshadowing of our apartment building and other existing apartment buildings that deny us sunlight and the use of solar power.
- . Other objections are the dramatic raising of height limits of other commercial towers on the site and the shrunken size of the waterfront boardwalk.
- . Our prime concern is the large residential block that has suddenly appeared in this latest incarnation completely blocking out any westerly views from the Stamford on Kent building. It also is sited so close to the building too that there will be considerable privacy issues. Considering that everything else in the area had to comply with the current Sydney codes and have a reach of only 8-10 floors, how could such a large building (4B) of 175M + (which is equivalent of Australia square) be allowed to proceed with no respect what so ever to existing views of residents and residential owners. This building block 4 has appeared from nowhere and been sited so that the majority of the outlook and view is taken away from the Stamford on Kent apartments.

The positioning of the other commercial blocks 1-3 also take away from all of the southern views (40%) from the Stamford on Kent and the residential block 4C is also taking away some of the northern views. We were nearly accepting this loss but the siting and increased heights of block 4B takes away what is left of any outlook and this is an outrageous outcome. We will be going from living in a village like precinct to being hemmed in on all sides by an oversized concrete jungle!

We are extremely outraged that nothing has been stated in the impact assessment about this loss or impact it will have on amenity and values. This one building (4B) on the site also severely adversely affects the two neighboring buildings, the Stamford Marque and The Georgia.

The only reference in the whole impact assessment to this total blocking of view is,

" The concept plan modification proposal, and the development block controls have sought to achieve a view sharing outcome for apartments with a western outlook from the Stamford on Kent " 5.4.2 of the impact assessment document. (Impact on Stamford on Kent)

There is in fact no thought of view sharing at all with the proposed position of building 4B on the site. At 175M it towers and dwarfs all the Kent St buildings and the vast majority of the outlooks and views of the west of Stamford on Kent. This is a major impact on existing amenity not to mention real

estate values in this precinct and all to gain more residential floorspace and profit to Lend Lease. Many of the existing residents have sunk their entire life savings into their homes here and will be hugely negatively affected by the modifications in this proposal

The idea that the new development participates in "view sharing " is laughable. The views and outlook of 3 major residential buildings are going to be severely blocked in this proposal !

2. Another negative impact is the overshadowing of the buildings. The height increases in the proposed building reduces the solar access of the Stamford building. We were looking to further green the building by use of installing solar panels. This would now not be feasible due to increased height limits in Barangaroo and the overshadowing of the Stamford building.

3. Other concerns are the shrinking of the the waterfront boardwalk by 50% to allow more residential buildings and the increased height limits of other commercial towers.

We feel that we are being reasonable and don't object to the development as a whole. The positioning of the building 4B in this latest incarnation and the increased height limits, which are dismissed and trivialized in the impact statement are of huge detriment to the whole Stamford on Kent building, the Stamford Marque and Georgia buildings. If this development were to proceed in the current form it would be a travesty of justice and the idea of keeping existing residential amenities a joke.

Yours Sincerely,

John Mickerson

Im Chuah

Im Chuah and John Mickerson
Owners SP-61643
Apartment 1603
Stamford on Kent
183 Kent Street
SYDNEY NSW 2000

cc **Lands Minister, Tony Kelly.**
Opposition Planning Spokesman, Brad Hazzard

David Gibson - Objection on Application No. MP06-0162MOD4

From: Gloria <gloriazhao@gmail.com>
To: <plan_comment@planning.nsw.gov.au>
Date: 10/09/2010 7:49 PM
Subject: Objection on Application No. MP06-0162MOD4

Dear Minister,

Re Application No. MP06--162MOD4

My name is Min Ying Song, owner of 701/187 Kent Street. I am strongly object the above mentioned application because I believe it will create a huge negative impact on the local environment, hence a big financial lose to me, my family and my neighbours.

Could you please consider to keep and try to improve the existing beauty and peace of this area, rather than approving the above development application just only benefits the developers financially.

We would much appreciate your kind consideration for not approving the above application. Would you please inform me your final decision on this application.

Sincerely yours,
Min Ying Song

160

From: <davidboward@bigpond.com>
To: <plan_comment@planning.nsw.gov.au>
CC: <sharon.armstrong@lands.nsw.gov.au>, <wakehurst@parliament.nsw.gov.au>
Date: 10/09/2010 5:38 pm
Subject: MP06_0162MOD 4 - time extension to 15 September, 2010

The Director
Government Land and Social Projects

Dear Sir/Madam,

I am a unit owner and Chairman of the lowrise SP61897 at 187 Kent Street, Millers Point - my objection is a personal one. I have reviewed the development changes proposed to the subject project at a information evening with Lend Lease and wish to object to the increased scale of the project and the movement in building forms across the site.

The increased height and placement of Block 4 has a dramatic impact on the views, amenity and environment of 187 Kent Street. Ours has been a prestige residential block of apartments for the past 10 years. Our building was formerly Caltex House in 1957 the tallest commercial structure in Sydney. Block 4 and its scale has a very significant shading impact on our building which is also contributed to by the significant increase in height to buildings to the south of Block 4. The shading impact means that during Winter we are in shade for all but 4 hours in a day - this totally changes our environment.

The siting of Block 4 also impacts dramatically on the privacy that our building has always enjoyed.

The water views that are enjoyed from our balcony are reduced by 50%.

Why should those coming many years after us to this location be given a preference in relation to views, enjoyment of nature and capital value. There is effectively a transfer of these benefits from us to them without any compensation. I am a tangible loser in this transfer and it takes place in accord with a new set of planning rules not conceived by any other major Sydney waterfront development.

I object strongly on the foregoing grounds.

sincerely
David Boward
Unit 913
0411209524

The Director, Government Land and Social Projects
Department of Planning
GPO Box 39, Sydney, NSW, 2001
plan_comment@planning.nsw.gov.au

10th September 2010

**Major Project Application MP06_0162MOD4-Barangaroo Concept Plan Amendment
(Modification number 4)**

We write in a last desperate attempt to put forward **our strongest objection** to the recent and changed proposal to the Barangaroo South project. We are residents of the Stamford on Kent Building at 183 Kent Street and have lived in the CBD of Sydney for the past 6 years. During this time we have diligently paid our taxes, our rates and significant amounts of stamp duty to the NSW State Government for the privilege of residency. We are loyal to our community and spend time and money supporting local businesses and thus would expect some common courtesy and consideration in return. We had hoped our time would be extended far beyond the next 6 years but this has now been put in serious doubt.

Our most serious objection comes after the first available viewing of the actual concept plan by the developer having not been made available until now. The proposed changes to the current plan not only increase the gross floor area of the whole development but also dramatically increase height limits causing great concern. This proposed site and building height of the new residential building block 4B as the latest amendment is highly distressing to say the least not to mention the diminished real estate value this would create. This change has come from nowhere and will block most of the western aspects to the water as well as being placed extremely close to our home, raising privacy issues. We are perplexed at best as to why the developer in question would propose the site directly in front of our residential building when there is only an 80 metre building in front of the commercial buildings on the southern most part of the site? If this huge residential building that would tower over our home was shifted to the southern part of the site amongst the larger planned commercial buildings it would be a more acceptable proposal.

It took considerable deliberation on our part and much research and review to make the move from the suburbs of Sydney to the city in order to change the quality and opportunity of our lifestyle, while being in closer proximity to our working environments. The choice we made to put all our hard earned savings and increase our debt was based on the properties outlook, balcony size, position and knowledge at the time, that our building would never lose the pristine view and charm of the working harbour.

Whilst we acknowledge that change is essential to move forward for Sydney city, it would appear that rules in place in the not too distant past have now unexplainably been disregarded without proper consideration of the impact to the many thousands of local rate paying voters. Properties that were built by the same developer in the recent past on Hickson road were restricted to approximately 8-9 stories and buildings further south of the precinct appear to have limits to height to ensure a tapered effect from the harbour foreshore even though the impact of these buildings is restricted to commercially zoned property as opposed to residential owner occupied dwellings.

It would now seem there has been a complete disregard for the rights and wishes of the residents in the Kent street area. Whilst it is obvious any developer would argue the proposed changes will create lasting legacy within the city and it is hard to argue that the current space would benefit considerably from sustainable smartly designed enhancements, the extensive changes proposed are totally unreasonable for the many thousands of residents.

These changes will also severely deteriorate the uniqueness of the Sydney City skyline by emulating other overly densely populated cities. Surely the state government of NSW has the responsibility first and foremost to protect the interests and wishes of its current constituents, also ensuring that Sydney maintains the breathtaking beauty and appeal, rather than purely chasing money.

We implore you to reconsider these drastic and grossly unreasonable changes and put yourselves in the shoes of the local residents who bring money and life to the CBD community. We would invite any one of the members on the decision making committee to visit our home and see firsthand how our pristine outlook and lifestyle is being threatened. It would be an understatement to say that these proposed changes and amendments, if passed would lock all residents into a concrete jungle.

These changes seem to have taken place without any genuine consultation from those that will be impacted first hand. Our move to the CBD has brought us much pride, a feeling of achievement, and success and one which we would not have made if we knew our current expansive views would be removed for the benefit of a dollar and to the complete detriment of what is undoubtedly the most beautiful harbour foreshore in the world.

We would expect your formal response to our strong objections and concerns prior to any final decision being made on the South Barangaroo project and rest assured that if the state government continues to pursue the current proposal, they will lose many thousands of votes, and we will do anything in our power to influence other voters to vote against a government that does not consider its current constituents.

In summary our strongest objection comes from the view sharing problem caused by the location of block 4B, if this was to be relocated in a south-west direction and the height of block C reduced our principle objections would be minimised.

Yours Sincerely

Linda and Michael Writer

Owners: Apartments 1305 and 2203

Stamford on Kent

CC: Alan Jones

CC: Clover Moore

CC: Kristina Keneally

CC: Barry O'Farrell

David Gibson - DEATH OF A HARBOUR

From: Nicholas Diamondes <nikodiamondes@yahoo.com.au>
To: <information@planning.nsw.gov.au>
Date: 10/09/2010 4:06 PM
Subject: DEATH OF A HARBOUR

To whom it may concern

- As a mature building designer I try to keep away from time consuming architectural competitions knowing that most times they serve as smoke screen for something else.
- Why is it that the good wining scheme was not allowed to be built.
- It is obvious that the Land lease project built into the harbour will establish a major precedent. It encourage other developers to colonise our harbour !
- There is already a massive wall of towers blocking the front of the harbour. If that wall gets into the harbour it will blockade the whole city like an old fortress wall !!

Only a miracle can save this project

N. diamondes
Building Designer

7/93 Womerah Av. Darlinghurst 2010

0421 103 603

163

From: "Amy Hu " <amyhuman@hotmail.com>
To: "plan_comment@planning.nsw.gov.au " <plan_comment@planning.nsw.gov.au>
Date: 10/09/2010 5:22 pm
Subject: comment on mp06-0162mod4

Dear sir/madam,
my name is min ying song, owner of 701/187 kent st, sydney. i disagree the application
mp06-0162mod4, at hickson rd, barangaroo, sydney. The apartment i own has water view, but with
the completion of this project, no water view any more.

Thanks.

Min ying song

Sent from my Nokia phone



THE PADDINGTON SOCIETY Inc.
For Community and Heritage
Est 1964

9th September, 2010

Attention: Sam Haddad
Director General
Department of Planning
Level 1, 23-3 Bridge Street
Sydney NSW 2000

Dear Sir,

**Re: Submission in response to the exhibition of MPO6_0162 MOD 4
BARANGAROO (Hotel development, additional GFA and Height)**

The Paddington Society is one of Australia's oldest heritage protection societies, formed in the 1960s to save Paddington from freeway developments and high rise buildings that would have destroyed the significance of one of the best preserved Victorian terrace house suburbs in the world. The Paddington Society has actively been engaged in the protection of Paddington's heritage ever since.

Our concern for Paddington is also a concern for Sydney generally and Sydney Harbour in particular.

The Paddington Society objects to the proposed modifications to the approved concept plan and the Major Projects SEPP. Indeed the examination of the proposed modifications raises serious concerns about the approved concept plan itself.

The consultation process for Barangaroo has been very poor. It is unreasonable to expect the community to appreciate all the complex issues of this huge scheme in the presentations made, the way they have been made and the time frames available.

No single project has ever had such a significant impact on Sydney Harbour. Great care is required in community consultation and the assessment of this proposal.

Submission by the applicant

Quality of the documentation in support of the submission is very poor. Whilst a large amount of material has been produced it is designed to confuse and conceal. The site analysis is deliberately naive and the view analysis diminishes critical views such as the view down Margaret Street as an example, the only street leading to the development. Most views down Margaret Street will be completely closed by the development. All views should be a 50mm aperture to tell the truth.

The only comprehensible justification for the amendments to the approved concept plan is commercial.

-2-

Permission to exhibit

The Paddington Society is concerned that the Department considers the documentation as adequate to assist the community appreciate all the implications of the scheme. In our opinion

the material should not have been permitted to go to public exhibition. Whilst it may perhaps pass a test of adequacy regarding a response to the Director General's Requirements it is a cynical submission to the public.

Many of the claims are simply wrong and should have been amended before exhibition.

No proposal should have been exhibited without significant demonstrated public benefits.

Modification to the approved concept plan

The changes proposed, with a new, tall, private building proposed in Sydney Harbour, some 60,000 square metres of additional floor area and additional heights of 97metres and 75metres and narrow streets constitute a very significant change. The changes should demand a new application and not be considered a modification.

Privatisation of Sydney Harbour

The waters of Sydney Harbour have been reduced in area since the arrival of Europeans in Australia. Much of the waterfront has been claimed as land, primarily for maritime industrial use or public purpose. Changes in maritime use and the exit of industry has eliminated the pressure on claiming the harbour for land and for years government planning policy has opposed any reduction in its water area.

The only private development has been as adaptive reuse of existing finger wharves or new development on reclaimed "brownfield" industrial lands. Even the Sydney Opera House was built on the site of tram stabling and sheds.

The Paddington Society objects the hotel pier projecting into or over the waters of Sydney Harbour. We oppose the pier, we oppose the private use of the pier and we oppose the huge scale of the hotel on the pier.

We do not see any case for a "trade" of water area, particularly when the projecting pier has a significant and negative impact on views from the public domain, such as Pyrmont Bridge, Darling Harbour, King Street Wharf, Pyrmont, Balmain and the north shore.

To make matters worse, the proposed hotel will overshadow the public waterfront. We oppose any development that overshadows the waterfront promenade, particularly in the afternoon.

The Society understands that the waters are currently zoned W1 Maritime Waters which prohibits the proposed use. We object to any zoning change and note there is no justification for a zoning change.

Privatisation of Barangaroo

Whilst a headland park and other public open space is proposed as part of the redevelopment of Barangaroo there is no coherent street system proposed to provide safe and obvious public access to the public domain. Public streets should be on a 120 metre grid and public streets should generally define the public domain.

The streets, unlike in the rest of the city, run east-west which limits or prohibits, solar access.

-3-

It would appear that every street was wider in the approved concept plan. No street should be permitted that is narrower.

Very few streets are proposed and the "lanes" are narrow and will be dangerous at night or worse closed to the public at night.

"Lanes" are just private office tower entry points.

The Society remains confused about what actually will be the publicly owned public domain.

It has been argued that there are successful publicly accessible private places such as Australia Square. We note that Australia Square is bound on all four sides by public streets.

The only genuine public street that serves the entirety of Barangaroo is Hickson Road on the boundary and outside the site.

This plan does not invite the public in.

The “fan” arrangement means views of the harbour from the public domain are focused on only one place rather than distributed along the city edge. The city does not stop at Margaret Street. There is no public benefit logic for the “fan”.

The envelope controls ignore any street system.

The Society objects to the privatisation of Barangaroo.

Public domain

The public domain requires legibility, surveillance, activity and people. These are not encouraged in the plan. To make matters worse, the restaurants proposed along the waterfront would be severely restricted by the residential uses proposed above. Experience has shown that restaurants within residential development at Jacksons Landing close early. Consequently Barangaroo will provide little competition for King Street Wharf and will not create the activity claimed in the proposal. King Street wharf has no residential on the waterfront.

The few streets are narrow and dominated by private development. No tall building 90 metres in length should be approved.

“City Walk” actually blocks views from Hickson Road and the bridge over Hickson Road is much wider than the connection adjacent to Napoleon Street, a pedestrian choke point.

Public places are addressed by private development, confusing the clarity of the public nature of the public domain, dangerously privatising the perception of the public realm.

It is grossly irresponsible to demolish existing potential public open space to add more water to Sydney Harbour at substantial cost to the public and ultimately reflected in additional height and floor space for the developer.

It would appear that the public streets are diminished in width, diminishing the public domain. This should not be permitted.

-4-

No buildings should be permitted that overshadow the public domain, particularly the public waterfront. The proposed hotel and the buildings proposed north of the “cove” in particular should not be permitted.

No buildings should be permitted on the alignment of Margaret Street.

No tall buildings should be visible from Observatory Hill.

Cruise terminal

The Society supports the National Trust’s call for the Cruise terminal to remain at Barangaroo as a traditional part of the working harbour. We object to the removal of the cruise terminal

from Barangaroo.

Precedent

Despite the assurances by government, we are concerned about the precedent set by this proposal. If it were constructed it would create a powerful precedent for towers and other development on privately leased water at places such as Rushcutters Bay below Paddington or in other bays such as Woolloomooloo Bay, Blackwattle Bay, White Bay, Mosman Bay, Lavender Bay, Berrys Bay and Gore Cove.

The development will also set a precedent for height along the entire western edge of the CBD.

We object to the precedent this development would set.

Objection in summary

The Paddington Society objects to this proposed modification as outlined above. We have been unable to identify any public benefit that would support any change to the approved concept plan.

Yours sincerely,

Robyn Attuell
President
The Paddington Society

cc Clover Moore MP
The National Trust of Australia
Barangaroo Action Group

David Gibson - Barangaroo South

From: "Dianne Cassen" <Dianne.Cassen@talent2.com>
To: <plan_comment@planning.nsw.gov.au>
Date: 10/09/2010 4:59 PM
Subject: Barangaroo South

Director, Government Land and Social Projects
NSW Department of Planning
GPO Box 39
Sydney NSW 2001

Dear Director

I am writing in support of Lend Lease's plans for Barangaroo South. I am a senior executive in Talent2, an executive recruitment company. By way of background, I have worked as an executive recruiter for Morgan & Banks, TMP, Hudson and Talent2 in Sydney CBD since 1993, specialising in the property industry. In the recruitment industry, we gain an intimate understanding of the effects of economic and business activity and its relationship to employment at a professional and executive level.

The GFC and associated reduction of available credit and funding has had a dramatic effect on Australian business and executive level employment, which is not adequately reflected in statistics. In particular, the property industry has been greatly affected, with very few major development projects moving ahead. This results in less stock available in all sectors for lease or acquisition, which in turn puts pressure on pricing and creates lumpier cycles. As few new office projects have moved ahead, Sydney is not well positioned for future business growth and demand, and we have limited facilities for exhibitions and conferences compared to other world class cities.

Sydney has had no new luxury hotels built in over 10 years, and many of our inner city hotels have been converted into apartments, as our demand for city living increases.

The NSW Government has a very rare opportunity for Lend Lease to instigate a major stimulus for the NSW economy, with a high quality development which will create a dynamic new environment for people to work and live, and maintain Sydney's position as a world class city. The project will create numerous long term jobs and have a very substantial multiplier effect for our state economy, at very little cost or no cost to the NSW Government.

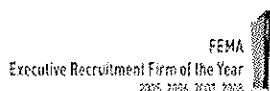
While it will require the NSW Government and City of Sydney to rethink and implement an appropriate transport strategy, that is long overdue and is essential irrespective of Barangaroo moving ahead.

It is a fact that no masterplan or scheme will ever meet with the approval of all stakeholders, and the ultimate approvals should focus on the greater good, not on minority interests. This is about what Sydney needs, and while it is important to listen to all views, it is not about what will make minority interests happy in isolation. The ultimate scheme must stack up financially for Lend Lease, so effective site utilisation and densities are critical.

Sydney needs this project to go ahead for many reasons, and it would be tragic if it was stymied by minority interests who cannot see the big picture.

Yours sincerely
Dianne Cassen

Dianne Cassen
National Manager, Property




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For further information, please view our online brochure www.talent2.com/brochure or visit our website at www.talent2.com

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 **Save paper – do you really need to print this email?**

**Millers Point, Dawes Point, The Rocks
Resident Action Group**



29 Lower Fort Street
MILLERS POINT
NSW 2000
12th September 2010

The Director of Urban Assessment
Department of Planning
23-33 Bridge Street, Sydney
NSW 2000

Dear Sir / Madam,

Modification of Concept Plan for Barangaroo (MP 06_0162 MOD4).

I attach a submission in regard to the modification of the Concept Plan. We are making two submissions – one in regard to the changes proposed to the Concept Plan (being sent separately) and this one in regard to the Concept Plan as a whole.

The reason for this submission is that the continued change of the Concept Plan has drastically reduced the potential amenity of life of the residents and the proposals are foreshadowing unacceptable intrusions on the community. The combination of the approval process and its administration has resulted in planning decisions which would be unacceptable anywhere else in the city. In this submission we ask that the entire Concept Plan be reconsidered.

I can be reached during business hours on 9225 3225 and after hours on 9241 2875. Please let me know if you would like any further information.

Yours faithfully

Millicent Chalmers
Chair

Cc the Premier, the Minister for Planning, the Council of the City of Sydney, Barangaroo Delivery Authority, Lend Lease.

Department of Planning
Barangaroo Concept Plan Modification and Major Development
SEPP Amendment MP 162_MOD 4
Millers Point Dawes Point The Rocks Resident Action Group

Submission

The Resident Action Group would like the following aspects to be addressed in decisions to be made in regard to the total content of the Concept Plan. We would be happy to arrange for a couple of our representatives to meet and discuss these problems with representatives of the Department.

We are making a separate submission on the amendments themselves.

Contents

Introduction

- 1. Integrity of the process**
- 2. Problems with the procedure**
- 3. Addressing residents' concerns**
- 4. Lack of innovation**
- 6. Heritage**
- 7. Transport and traffic**
- 8. Community space**
- 9. Safety issues**

Summary

The following points are raised briefly in this document. In view of the short time available for comment and the significant size and importance of the project, details of the matters raised will be provided later.

1. Integrity of the process

Details of the agreement between the Government and the Developer are hidden. This is particularly disturbing when governments around Australia and the world are being pressured to raise funds to redress outlays caused by the Global Financial Crisis (GFC). There is widespread community concern that the Public Service is being pressured to contribute to this process of applying higher priority to it than to the legitimate protection and support of the rights and interests of the State's residents.

We have received mixed messages from various sources about who benefits and how from the development. This is a vast development site in a prime position, yet it is suggested that the State Government is not receiving any funds from its sale and development. This is a site near the centre of the city and yet there is little discussion of how it will relate to the city and how it will improve the functioning of the city. Adding a hotel and flats and offices is not an innovative solution.

The Government's motives in undertaking the development have not really been explained. A lot of words have been released but none of the expressed motives (such as iconic city development, recoupment of revenue) really explain why this particular mishmash of flats, shops, hotels and offices is being proposed.

We question the integrity of a proposal which accepts one of the largest development sites in the city's history and then needs to extend into the harbour. This is completely unnecessary and appears to be a ploy to build on the opportunities of a flawed process and considerable secrecy.

The process of the examination of proposals is seriously flawed. By considering this development under Part 3A of the Environmental Planning and Environment Act, the Department is required to make a decision within 28 days from the end of the consultation period. The consultation period is too short and the period for decision is far too short. These are decisions on a project, not just of great complexity but of huge public and personal impact for residents,.

The Government had enough time to have drafted a special Act of Parliament for the establishment of the Barangaroo Delivery Authority, but did not make any effort to make special arrangements for the consultation and planning decisions necessary for this type of project.

The role of the Delivery Authority raises serious questions within the framework of the Westminster principles of good government. Here is a government authority charged with the achievement of a development where the philosophy, design, planning, consultation, financing, communication and change of the whole project is being managed by the commercial, profit-making corporation which will benefit from the financial aspects of the project. Serious ethical and governmental concerns arise from this artificial structure.

2. Problems with the procedure

The structuring of this project means that the concept plan is being changed in parallel with the plans for details of the development. This produces a constantly changing collection of proposals in what is already a complex development. The explanations provided by the developer do not clearly explain the interrelation of these changes and there is considerable community disquiet about the integrity of the procedure.

This is particularly so where it is clear that there is no guaranteed certainty about any aspect of the development because applications for change are so readily accepted by the department. Any approval is transitory at most.

It may be that some of this concern arises from deliberate poor communication and inadequate information. There should be some supervisory body to require that these problems of communication and information are regularly and speedily addressed.

The procedure of approval has excluded the one body in the State which has the best accumulated experience, training and structure to address the problems being raised – the Sydney City Council. Over a period of thirty years in dealing with the officers of the Council, the Group has experienced the skills, local knowledge and integrity of this planning team and regrets their exclusion.

It is most unusual that the one team which is properly equipped to deal fairly, accurately and skilfully with the city's development should be excluded. Residents are most troubled to know why.

3. Addressing residents' concerns

Residents feel particularly sidelined by this process. What is being proposed is a major attack on their:

- Community identity
- Quality of life,
- Life savings, and
- Dignity.

There are two main groups of residents who are very badly affected by this development:

- the long-term, elderly residents living mainly in terrace houses in the adjacent streets and
- the owners and occupants of home units in the high-rise buildings in Kent Street.

The long-term residents, many of whom have lived in the area for thirty to eighty years, are very concerned at the lack of acknowledgement and respect for their amenity of life. Views are being removed or truncated, traffic is being either mismanaged or ignored, and so-called community areas are being proposed in an area remote from their homes (in a suburb where the Resident Action Group, after thirty years of service, has to depend on the local church for a meeting room).

These are not parasitic dependants on the State. They are people who have worked from a young age and have retired having paid their taxes and raised their families and expect the State to support them in their old age. The area has one of the oldest demographic ranges in the metropolitan area. The lack of perception of their needs and fears has been very noticeable.

The residents in the high-rise buildings in Kent Street are also a strong part of our community. They have become integrated into the old community and we present a united front. They have supported the Darling House Aged Care Hostel and indeed initiated community projects such as the junior tennis club and which have been notable successes.

These residents have used part of their life's earnings to purchase units in the tall buildings along Kent Street. One of the most endearing aspects of many of the units is the view of the harbour from them. The proposals have all made no attempt to preserve these views. Derisive discussion has been offered of sight lines and viewing corridors. This has been very disappointing and increasingly insulting.

We are aware that Australian law does not specifically protect the views from buildings but requires it to be considered. In Australia citizens are encouraged to save for their retirement (and in fact are required to save for their retirement). Many of the residents of the high-rise buildings are to be radically and brutally affected in regard to their views. We would have thought that the role of the Government, elected and employed, would be to protect an important aspect of retirees' lives: the visual contact with the harbour which is such a large part of our daily lives.

These are not requests on behalf of people who have not contributed to our society or who achieved their assets as a windfall. They have worked hard and obeyed the law. They should be helped to protect what they have earned.

4. Lack of innovation

We are considerably perturbed by the lack of innovation in the treatment of the site. Not that we would like to see an ego-driven bizarre design. On the other hand we are being faced with designs reminiscent of Docklands in Melbourne.

This is a site which is predominantly composed of a reclaimed edge of the harbour. It also has an added complication that part of the reclaimed area contains the poisonous remains of the gas tanks from the old gas factory. It is part of an important traffic corridor between Walsh Bay, The Rocks, Millers Point, the city and the Western Suburbs.

In an era when planning into the future is encouraged, we have had no information setting out why the whole project does not include a tunnel corridor along the whole site providing for access for transport, underground parking with access to the tunnel, delivery drop-off access, and even underground retail areas like those so successful near Town Hall and Wynyard stations.

We realise that it is cheaper to build above ground but the social cost is extreme. This area is not the CBD, it is part of an established, successful community. In a truly democratic society, a rigid limit of seven stories would apply to the entire site and fast, convenient and underground transport would be a given. The potential for a sophisticated, extensive underground development across the entire site, supporting modest commercial and residential development and community facilities would be sensible.

Do we want to present to the future another mediocre compromise with routine commercial extensions?

5. Heritage

A noticeable gap in the planning so far is the lack of recognition of the Hungry Mile. We have heard of no attempt to find and celebrate any small relic of the grim past of this area. Residents have parents who were part of the harsh period when men queued for more than a mile waiting to find work. Fainting in the queues was not unusual. Office workers spoke of wharf rats (the large German variety about the size of a domestic cat) coming into the offices looking for food. We should not gloss over this period. Much of Australia's resilience in the GFC comes from the work ethic reinforced in that period.

We would like to see more respect paid to the maritime history of the area. We are losing Sydney's working harbour and the proposals make no reference to that. The encroachment onto the harbour further reveals the lack of respect integral to the proposals.

We also question the naming of the site "Barangaroo" and do not accept that it is too late to change it. Barangaroo was the wife of Beneelong (now called Bennelong) and hated the European settlers. It is disrespectful to use her name so cynically. It also ignores that fact that it is highly unlikely that she spent any time in the area. How irrelevant.

6. Transport and traffic

We would draw your attention to the lack of information in regard to proposals for transport in the area. It has the potential, whatever the development, of being subject to considerable pressure with the movement of employees, residents, visitors, tradespeople and those coming to the proposed educational and entertainment sites in the central zone.

We realise that a current way of dealing with traffic problems is to make the streets as unfriendly to cars as possible. This is impracticable as residents of all ages need cars to buy groceries at acceptable prices, see family and friends, move children between school, sport and cultural activities and deal with the emergencies of life such as ill-health. Public transport is not adequate for these purposes. Accordingly, it will be necessary to make adequate arrangements for parking, traffic control and commercial traffic.

So far, we have had no guarantees in regard to the public transport in the area. The increased traffic flows will severely change the nature of traffic and even now the area is noticeably lacking in transport. A full, frank and detailed explanation of the State Government's plans for transport in the area over the next twenty years would appear to be a pre-requisite to any development of the site.

We are also unconvinced by the descriptions of the relationship of the site with the CBD. Observation of behaviours in the CBD reveals that businesspeople routinely use taxis for moving from office to office. A consultant or professional advisor earning \$1,000 an hour is

not going to spend his or her time walking about the city. We have seen no acknowledgement of this in the planning.

An element also not addressed is the treatment of street activity. Millers Point is an area where skateboarders abound and where weddings are routinely celebrated. We have seen no mention of how these will be dealt with. The plans we have seen for open space rather contribute to the exacerbation of these problems rather than the solution of them.

6. Community space

We note that the driving force of this development is the provision of sufficient commercially realisable investment. The first items being addressed are all commercial. We accept that the developer must consider the cash flows of such a large site but the owner of the land is the State of New South Wales.

We have the very strong impression that the design of the development is such that the provision of the headland park is a sop to people wanting open space, the purported allocation of part of the site to community uses is to give an aspect of even-handedness and that the real reason for the development is the achievement of considerable high-rise as quickly as possible.

There is such a range of potential needs for community space such as meeting rooms, churches, mosques, synagogues, performance space, meals on wheels, aged care centre, aged care accommodation and, disability support. These are all growing needs in the city community at large. We have not heard of specific consultation on the type or extent of needs in the city. In view of the silence in regard to the central planning area, this may need to be addressed in the commercial area.

8. Safety issues

We have not been given information on some of the safety issues and some of the information on matters such as remediation of contamination has raised even more concern. For instance, at a meeting where the developer was explaining the remediation process, it was revealed that while concern had been expressed for protection of children in The Bond facility, the representatives did not know about the child care centre which has been in High Street immediately above the contamination site for thirty years. This did not increase our comfort.

We have also been very worried by the lack of interest in the safety of pedestrians and families. The parks, walkways and canals need to be designed so that their safety can be assured.

**Millers Point, Dawes Point, The Rocks
Resident Action Group**



29 Lower Fort Street
MILLERS POINT
NSW 2000
12th September 2010

The Director of Urban Assessment
Department of Planning
23-33 Bridge Street, Sydney
NSW 2000

Dear Sir / Madam,

Modification of Concept Plan for Barangaroo (MP 06_0162 MOD 4).

The Resident Action Group would like to record its support for the detailed submissions lodged by the Kent Street Residents Group and in behalf of the residents in the apartment buildings such as the Stamford on Kent and Highgate. These set out the serious and permanent damage that is proposed to the assets and the way of life of those residents.

The residents across the suburb are seriously concerned at the flaws in the proposals relating to overshadowing, traffic, loss of views, unsupervised open space and ill-conceived encroachment on the harbour.

I can be reached during business hours on 9225 3225 and after hours on 9241 2875. Please let me know if you would like any further information.

Yours faithfully

Millicent Chalmers
Chair

David Gibson - Att: Director Governmet Land & Social Projects Dept. of Planning

From: "Cseti Group" <csetigroup@gmail.com>
To: <plan_comment@planning.nsw.gov.au>
Date: 13/09/2010 4:23 PM
Subject: Att: Director Governmet Land & Social Projects Dept. of Planning

13th September 2010

Re: MPO6_0162 MOD 4

My wife & I own two apartments in the Kent Street Village area. One in the Stamford on Kent and one in the Stamford Marque.

We object strongly to the new proposed modifications which have a major impact on the communities which occupy both the Stamford on Kent & the Stamford Marque, and which appear not to have been involved in consultation whatsoever. We felt that our views on the matter have simply been pushed aside & treated as being trivial.

Although the whole concept of developing Barangaroo is not something we disagree with, there are certain objections to the modification which we consider of importance. These are:

1. The increase in height & placement of Block 4 which seriously impedes on the views & amenities of 3 already existing residential apartment buildings in Kent Street
2. The over shadowing of Stamford on Kent & Stamford Marque that deny us sunlight during most of the day.
3. The dramatic increase in height levels of the commercial buildings on the southern side which dwarfs our apartment & blocks our views entirely.
4. Expected increase in commercial activity but insufficient infrastructure to deal with substantial rise in car numbers and people.
5. Increased noise and pollution levels.

Our concern here is that the huge residential block which has suddenly appeared in the planning is now so tall it blocks out our western views entirely. Instead of a natural progression to the water's edge (tallest buildings at the back, smaller ones to the front) we have a complete reversal. This seems to go against normal practices in any other major city, anywhere.

Why?

These towers would also invade on our privacy, being so close together that we could literally see what our neighbours are having for breakfast each morning. Whatever happened to the building codes whereby buildings in the area could only have a reach of 8-10 floors? How can such a large building (4B) at 175m be allowed to proceed with such little consideration to those of us who already live in the area? This building block is designed to take the majority of the outlook away from the apartment buildings on Kent Street. Why is it being allowed?

Buildings of this scale and no thought given to how the existing infrastructure, which is already straining, can possibly cope with the numbers, suggests minimal if not poor planning. Lend Lease talk about access from Wynard Station, but surely you can not expect an already strained system to cope with the expected rise in numbers of people working, visiting and residing in Barangaroo. Car numbers alone will cause major problems.

The positioning of the other commercial blocks 1-3, and the Hotel also takes away all of our southerly views (40%) from Stamford on Kent & Block 4C is taking away some of the Northern views. Not too bad if the buildings in front of us were reduced in height, as per the earlier plans, but now, instead we have these tall monstrosities which are outrageous in height and in placing. We now exist in a concrete jungle which is horrendous by any measure.

Nothing has been stated in the impact assessment & our building receiving a mere two lines. In fact, wrongly, it is assumed that those of us who live in Kent Street are perfectly happy with the design. This is absolutely untrue.

The issue of noise pollution and car pollution appears to have been given no consideration whatsoever. All to the detriment of those of us who live in the area. Stamford on Kent, Stamford Marke, Highgate, The Observatory and The Georgia represents a community and is recognized as such. These are our homes!!!

We are perfectly reasonable people and expect those who are determining the outcome of such a major development to be reasonable too, and consider the views of others.

To proceed in this manner is laughable.

Is this really all that we are capable of producing? If so, then these are sad days indeed.

Yours sincerely,

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