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Mr Matthew Rosal,
Department of Planning & Infrastructure,
23-33 Bridge Street,
SYDNEY NSW 2000

Dear Mr Rosal,

Sydney International Convention, Exhibition and Entertainment Precinct –
ICC Hotel

Pymont Action Inc is not opposing the hotel development, as this would be futile, the decision to proceed having already been made prior to any consultation. However, we wish to make the following recommendations which we trust will be addressed in the final determination:

- 1.0 Access – Currently, the site of the hotel is not easily accessed by pedestrians from Pymont/Ultimo and it is not clear how this situation will improve with the construction of the hotel. Pedestrian access is currently via a dark, dirty and gloomy elevated pathway from Fig Street, which does not directly link to the CBD. Pedestrians are required to take a lift (often out of order) or stairs down to the badly signposted labyrinth of Darling Harbour, then on to the CBD via various exits which give no indication as to where they are heading. The other access is from the Pymont Bridge via Harbourside.

Recommendation: The proponent be required to complete, clean and illuminate the elevated pedestrian pathway adjacent the Western Distributor to link Fig Street, Pymont directly with the CBD on the E side of Darling Harbour.

We have also sought in our earlier submissions, the exclusion of cyclists from the Darling Harbour Precinct, other than the Haymarket Precinct. The proposed cycleway along Darling Drive will allow cyclists to move from north to south, albeit that there is no clear resolution of how they access the existing cycleway in Union Street



and the Pyrmont Bridge. Darling Harbour should remain a pedestrian precinct, one of the few public places where pedestrians can walk without fear of being knocked over and injured as has happened on Pyrmont Bridge, or even on footpaths where cyclists are prohibited by law.

Recommendation: The hotel and Core Facilities precinct should be a pedestrian only precinct.

We are still very unclear as to the strategies to be adopted during construction to ensure that people in Pyrmont and Ultimo can continue to access the CBD and those parts of Darling Harbour that are not within the construction zone. With the paucity of public transport it is essential that existing access points are kept open so that people do not have to make long detours to get to their City destinations.

Recommendation: The existing access points between Pyrmont/Ultimo and the CBD be retained or convenient alternative access strategies be put in place to ensure that those living West of the development zone are not disadvantaged during construction.

- 2.0 Transport – Contrary to statements in the Environmental Assessment, the Darling Harbour precinct, including the hotel site, are not well served by public transport. Central and Town Hall railway stations are a long walk from the site and the light rail service currently only takes passengers to Central railway, not to the central CBD or Circular Quay. The monorail has been dismantled and the bus services in Harris Street are very unreliable, infrequent, often full and don't stop, and don't take passengers into the central CBD. Access to Harris Street may be improved, but is still not close to the DH precinct. Much more work needs to be done on public transport improvements before this DA should be approved, eg light rail services need to be increased and shuttle services run on event days where up to 23,000 visitors are expected. A new bus service which runs along Darling Drive and into the central CBD should be provided, which can also serve Pyrmont and Ultimo.



Recommendation: The public transport must be improved before approving this DA; new services should be provided; shuttle services should be provided on event days.

- 3.0 Traffic - We have raised the failure of Infrastructure NSW or the proponent to address the cumulative traffic impact of this massive redevelopment in our submissions on the Core Facilities and parts of the Haymarket Precinct developments. The hotel will further exacerbate the problem, adding to traffic jams at major intersections in Pyrmont – at the Western end of Pyrmont Bridge, in Harris Street, and at the Pyrmont Interchange at the Fish Markets. The Traffic Study failed to look at intersections beyond the immediate vicinity of the proposed development and is therefore invalid in terms of assessing the real impact on Pyrmont and Ultimo. In addition, we note that no provision has been made for parking in the hotel, with patrons required to use the car parking associated with the Core Facilities. This will inevitably result in a spill-over into scarce on-street parking in Pyrmont.

Recommendation: This development should not be approved until there is further independent assessment of traffic and parking impacts beyond the immediate site.

We note the establishment of the Darling Harbour Community Liaison Group which will monitor construction impacts. We ask that a condition of approval be that concrete trucks be kept out of adjoining suburban streets, already badly impacted by them from two batch plants operating in Pyrmont. We propose that concrete be delivered by barge from the Barangaroo batch plant as an alternative.

Recommendation: Concrete trucks should not use Pyrmont and Ultimo streets but be delivered by barge from the Barangaroo batch plant.

- 4.0 Views and Overshadowing – We note that the adverse impacts on views and overshadowing have been reduced with the removal of one of the proposed towers. However, we do not agree that "...the proposed development has achieved a reasonable



balance between the protection of private views and the protection of public domain views..." Residents will undoubtedly be negatively impacted by this unheralded development which was sprung on the adjacent communities as a *fait accompli*. The affected residents will have no power to prevent the development and no financial redress from loss of value of their properties. This is unreasonable. To reduce the hours of solar access in mid-winter available to some residents in the Oaks Goldbrough apartments to 3 – 4 hours is also unreasonable. With the proposed construction of a huge hotel at Barangaroo and the proximity of the new hotel at The Star in Pyrmont, we question the necessity of a hotel being built at Darling Harbour.

Recommendation: That the necessity of the proposed hotel be re-evaluated given the proximity of the proposed Barangaroo Hotel and the new hotel at The Star in Pyrmont, given the adverse overshadowing and loss of views to be inflicted on residents in Pyrmont and Ultimo.

- 5.0 Scale of Development – It is asserted in the EA that the height of the hotel is compatible with the CBD cityscape. This totally disregards the fact that the hotel is visually nowhere near the CBD; is within metres of Pyrmont/Ultimo where the buildings are of a completely different scale; and will have a huge visual impact on those living to the West, and, to some extent, the South of the site. It sets a height precedent for any future development occurring in Pyrmont/Ultimo which could be forced on the community under the proposed new planning laws.

Recommendation: That the proponent be required to provide an analysis of the visual impact of the hotel building height on the Pyrmont/Ultimo cityscape; and of the implications for future height restrictions under the proposed new planning laws.

- 6.0 Wind – We note that the laneway between the hotel and Harbourside Shopping Centre has been rated acceptable for able-bodied patrons only. No wind mitigation strategy has yet been developed. In Pyrmont we experience appalling impacts from wind tunnels created by high rise buildings, particularly in Jacksons



Landing – another Lend Lease development. Sometimes frail residents are unable to leave their buildings in Distillery Drive without assistance when high winds are blowing (which is a lot of the time). The DA should not be approved unless the building is modified such that all patrons (not just those who are able-bodied) of Harbourside can enter and leave the building in safety. This is a disability and equity issue which must be addressed.

Recommendation: The DA should not be approved until wind mitigation measures are put in place that allow all patrons of Harbourside to enter and leave the building without risk of being blown over.

- 7.0 Landscaping – We note the extensive use of Livistonia palms and other tropical plants which purport to represent the vegetation that may have been in the locale at the time. We draw attention to two documents – the draft Urban Ecology Strategic Action Plan (City of Sydney) and *Transformations: Ecology of Pyrmont Peninsula 1788 – 2008* (J. Broadbent, 2010) both of which promote Biodiversity as a principle to be followed in greening Sydney. Even in traditional landscaping terms, a monoculture of Livistonia is out of place noting that they were very popular with landscapers in the 90s but very unpopular with members of the community. We note that some beautiful blackbutts will be removed to make way for the Core Facilities and could be transplanted (under the supervision of an arborist). We also suggest that the vegetation associated with the hotel and Core Facilities be diverse, suitable as habitat for native birds and animals and be selected from the lists provided in the Urban Ecology Strategic Action Plan and, if historical recreation of landscape is intended, from the historical analysis undertaken by Dr Broadbent.

Recommendation: The landscaping as proposed is boring and does not conform with the Greening Sydney principles outlined in the City of Sydney's draft Urban Ecology Strategic Action Plan 2013. The landscaping should conform with Biodiversity and habitat principles and use a variety of local native species – not be a monoculture. Livistonia should not be planted en masse.



8.0 Consultation – This whole Darling Harbour redevelopment has been thrust upon the community and we have no power to stop it happening under the current planning laws where anything deemed State Significance gets the nod. Yes, we have attended various consultation sessions on the Core Facilities and Haymarket precincts and have had assurances that some of our concerns will be addressed with regard to social infrastructure (no definite commitment as yet). The scale of the hotel has been reduced following the initial consultation on the concept plan and that is a positive but it will still negatively impact on nearby residential buildings and the Ibis Hotel. However, only two sessions on one day were conducted (as information sessions only) with no opportunity to actually discuss the development in an open forum, although private briefings were offered to PA, but declined. We would hope that in the future, the community will be able to have its say on whether such developments proceed, rather than just try to get some minimal improvements to something already pre-determined by Government.

We trust that our concerns will be addressed in the final determination of this DA.

Yours sincerely,

Elizabeth Elenius

cc Graham Jahn (City of Sydney), Clr John Mant, Alex Greenwich MP, Clr Clover Moore (City of Sydney)

