



Developers, Investors  
ABN: 79 454 277 011

**Dunnet Properties Pty Ltd**  
Suite 15,  
20 Young Street  
Neutral Bay NSW 2089

**Ph: (02) 9374 6600**  
**Fax: (02) 9374 6699**

15 December 2022

Director – Key Sites Assessments  
NSW Planning, Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Attention: Paula Bizimis – [Paula.Bizimis@planning.nsw.gov.au](mailto:Paula.Bizimis@planning.nsw.gov.au)

**SSD-35283699 – Submission**  
**Sydney Olympic Park Metro Station Over and Adjacent Station Development**

Dunnet Group are the owners of 8 Figtree Drive, Sydney Olympic Park (Site 50), which is located directly to the south-west of the proposed State significant development application (SSDA) for the Sydney Olympic Park Metro Station – Over and Adjacent Station Development. Dunnet Group would like to thank the NSW Department of Planning and Environment (DPE) for inviting submissions on this SSDA and we now provide the submission of objection to the proposed SSD-35283699.

Dunnet Group's objection is on the basis of the cumulative overshadowing impact that will be caused by the proposed SSDA together with the rezoning of the adjacent Site 48 to our site. This will detrimentally impact the ability of the future redevelopment of our site to achieve sufficient levels of solar access, thereby impacting the commercial viability of our site

**Dunnet Group's landholding**

Dunnet Group's site at 8 Figtree Drive, Sydney Olympic Park is also known as Site 50 and is within the Central Precinct of Sydney Olympic Park, as identified in the Sydney Olympic Park Masterplan 2030 (Interim Metro Review). The location of Site 50 in relation to the Sydney Olympic Park Metro site is shown in **Figure 1**.

It is important to note that the Sydney Olympic Park Masterplan 2030 (Interim Metro Review) identifies detailed controls guiding development in Sydney Olympic Park. The longstanding vision for the Central Precinct of Sydney Olympic Park has for decades been to only deliver tall buildings along Olympic Boulevard, which has been developed through comprehensive master planning and resulted in positive urban design outcomes. Accordingly, this vision for the Central Precinct appropriately envisaged smaller scale buildings on Site 47, and only one building on Site 48.

Recent changes have been made to the Sydney Olympic Park Masterplan 2030 through the Interim Metro Review which solely involved amendments to the Sydney Olympic Park Metro Station site, being Sites 40, 47 and 48. It involved changes to the applicable land uses, maximum building heights, floor space ratio, street and building site layouts, podium heights, and the allowed quantum of open space for the Metro Station site. All these changes to the Sydney Metro site were gazetted in July 2022. This involved a significant increase in the height of Site 47, as well as modelling which includes two towers on Site 48, despite significantly adverse amenity outcomes for Site 50. The remaining controls in the Sydney Olympic Park Masterplan 2030, including those relating to Dunnet Group's landholding at Site 50, remain unchanged in the updated Sydney Olympic Park Masterplan 2030 (Interim Metro Review).

In relation to Dunnet Group's landholding at Site 50, the Sydney Olympic Park Masterplan 2030 (Interim Metro Review) earmarks a mixture of uses including commercial, residential, hotel, serviced apartments and themed retail uses. The Sydney Olympic Park Masterplan 2030 (Interim Metro Review) envisages a maximum height of 45 storeys for Site 50, as well as nil setbacks to the north of Site 50 along Figtree Drive.

However, the proposed SSSA involves three buildings, including a 21, 27 and 45 storey building. These will have major overshadowing impacts on Site 50 which will detrimentally impact the viability of a mixed use development in line with the Sydney Olympic Park Masterplan 2030 (Interim Metro Review) vision for the site, as is detailed in the following section of this submission.



**Figure 1: Site 50 and its location in relation to the Sydney Metro site at Site 47**

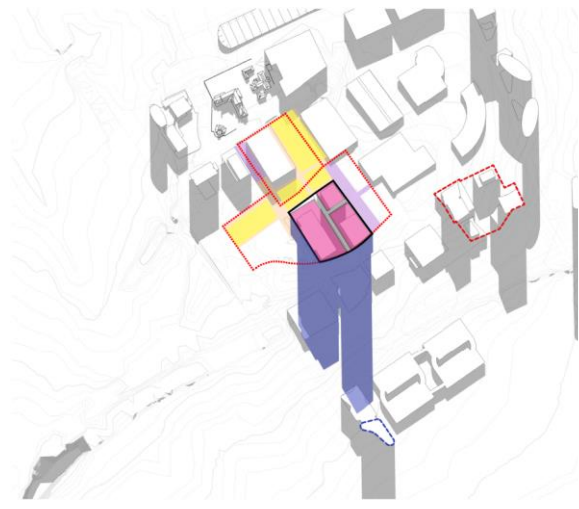
**Overshadowing impacts of the proposed SSSA**

The proposed SSSA will result in significant overshadowing of Site 50 on the winter solstice from 9am through to 1pm, with vast impacts from 9am through to 12pm. This is demonstrated in the below extracts of the overshadowing diagrams submitted with the SSSA included at **Figure 2** below.

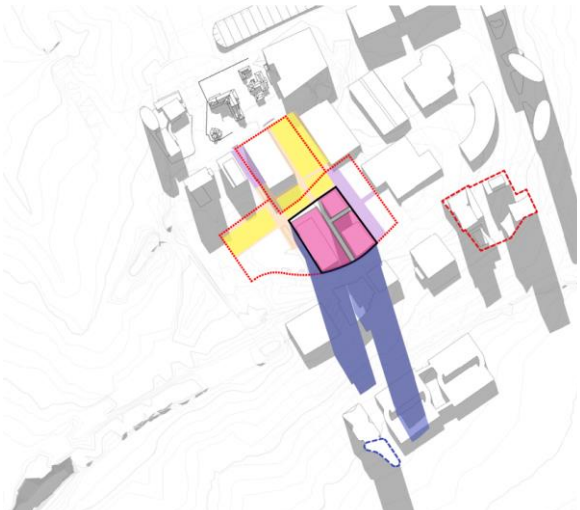




Overshadowing caused by the proposal at 11am on the winter solstice



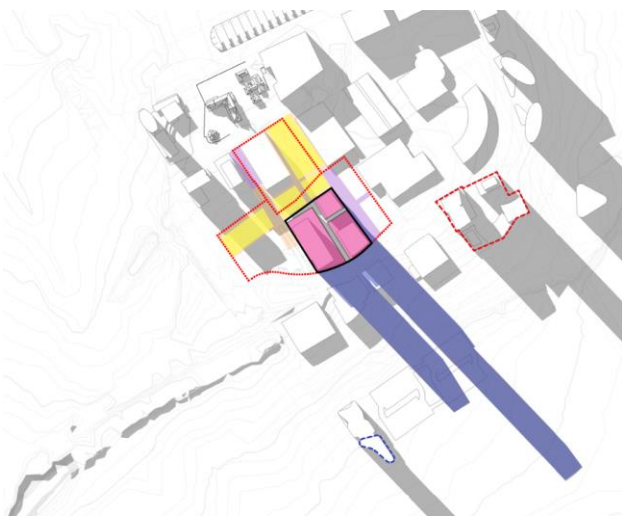
Overshadowing caused by the proposal at 12pm on the winter solstice



Overshadowing caused by the proposal at 1pm on the winter solstice



Overshadowing caused by the proposal at 2pm on the winter solstice



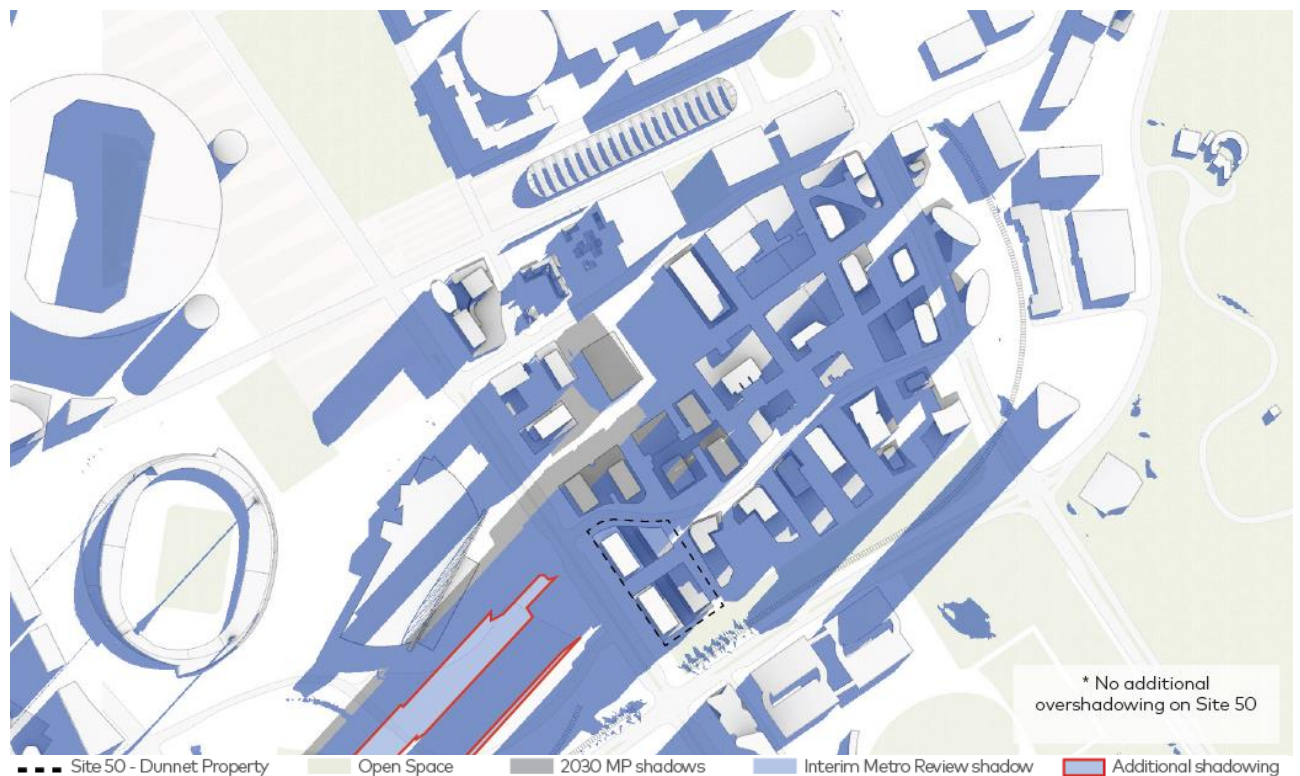
Overshadowing caused by the proposal at 3pm on the winter solstice

- SSD Concept Design
- SSD Concept Design Shadow
- Public Open Space
- Pedestrian Only Zones
- Share Way
- Sydney Metro Site Boundary
- SSD Site Boundary
- Mirvac Pavillion Apartments
- Boomerang Apartments

**Figure 2: Excerpts from overshadowing diagrams**

Further to the major shadow impacts caused by the proposal on Dunnet Group’s landholding at Site 50, it is evident the proposal has been designed without regard to the vision for adjacent sites that is set out in the Sydney Olympic Park Masterplan 2030 (Interim Metro Review), namely the cumulative shadow impacts on Site 50. Following the Interim Metro Review changes, the SOPA modelling and the Concept SSDA modelling indicate that two towers are to be delivered on the adjacent Site 48, located to the immediate west of the proposed Concept SSDA site, contrary to the longstanding vision of only one building being delivered on Site 48. When the proposed concept SSDA is considered together with the vision for two towers on Site 48, our landholding at Site 50 would be significantly overshadowed from 9am through to 3pm. This is clearly demonstrated in the shadow diagrams prepared by Cox Architecture that accompanied the Sydney Olympic Park Masterplan 2030 (Interim Metro Review) Response to Submissions Report (refer to **Figures 3 -5**). Further, Curzon + Partners are currently undertaking modelling on the cumulative overshadowing impacts on Site 50, and this will be submitted to the Department of Planning and Environment under a separate cover.

The cumulative shadow impacts caused by the proposed Concept SSDA and the future development on Site 48 will detrimentally impact the development potential of Site 50 in terms of maintaining acceptable levels of solar access to the podium and towers. This is especially harmful to the development potential of Site 50 given that the site is envisaged to be mixed use including significant components that will likely comprise a residential use. As such, given the significant all day cumulative overshadowing expected as a consequence of the Interim Metro Review of Site 47 and 48, further work is considered necessary for the Concept SSDA to mitigate the overshadowing impacts on Site 50.



**Figure 3: Cumulative overshadowing impact of Sites 47 and 48 on Site 50 – 9am on winter solstice**

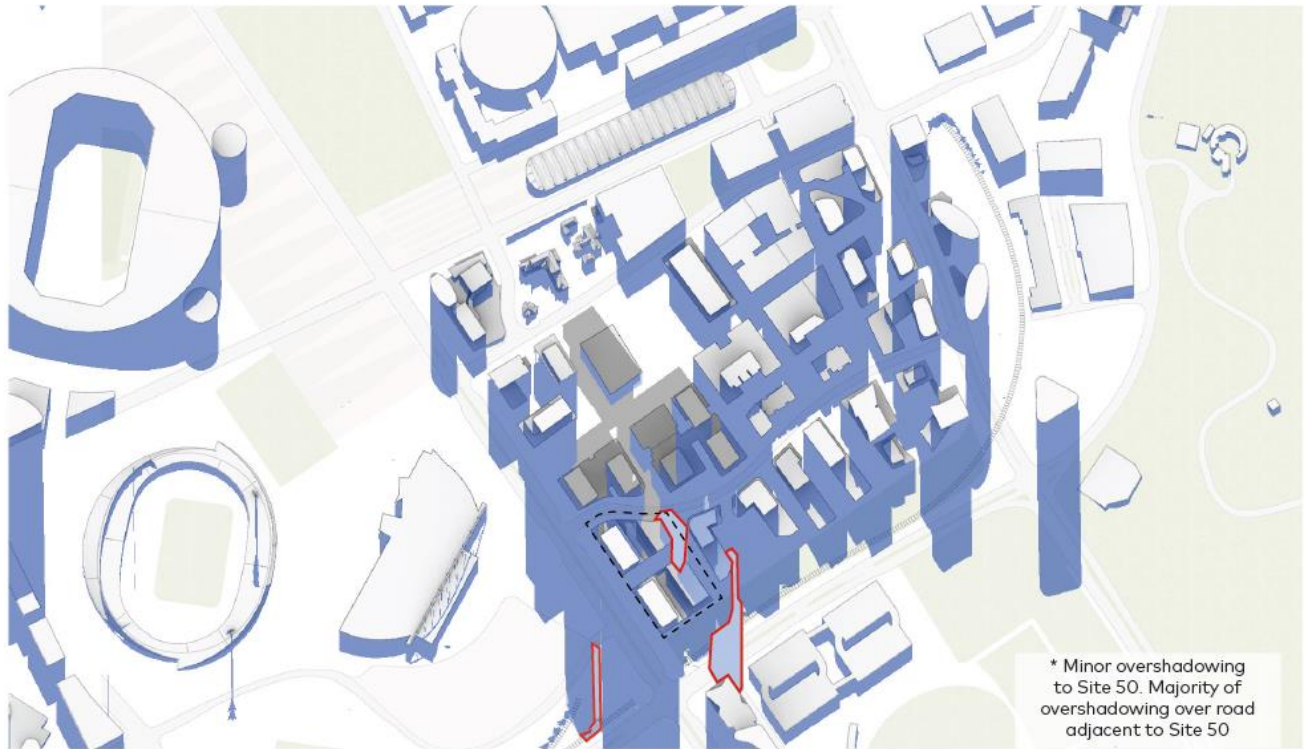
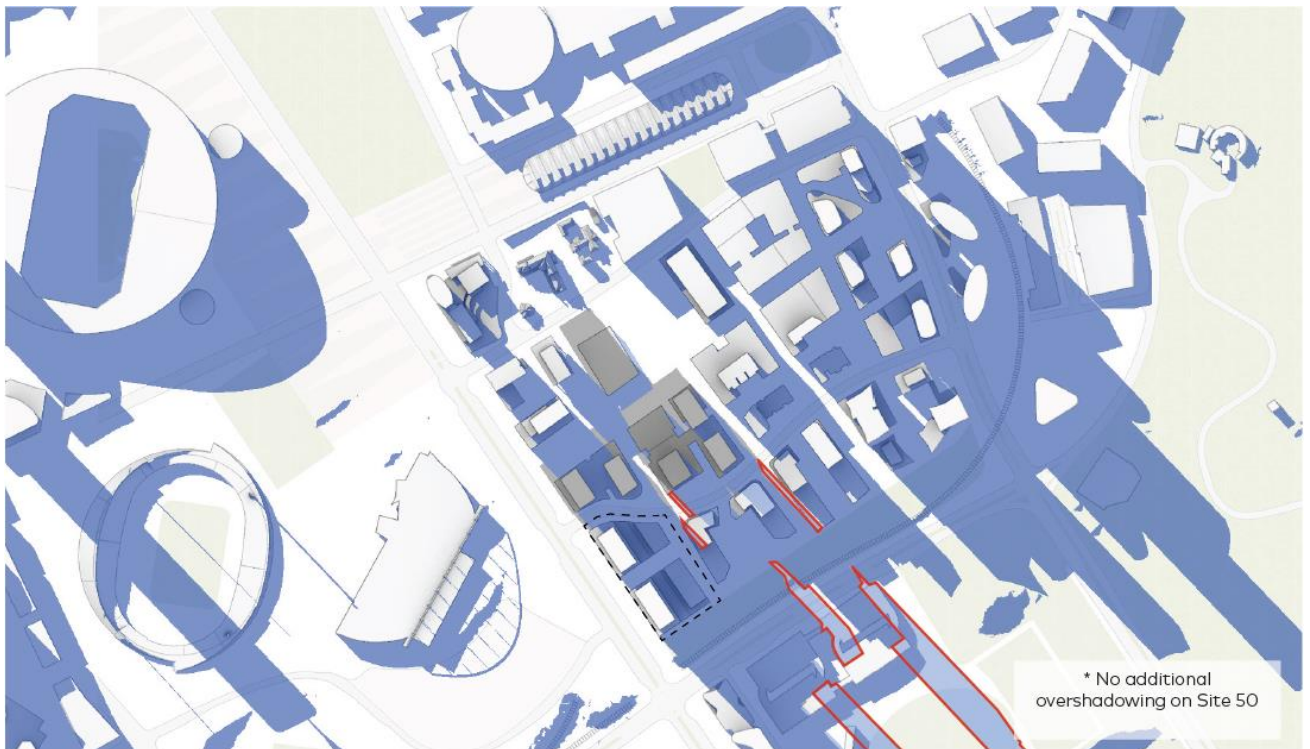


Figure 12: Master Plan 2030 controls vs Interim Metro Review - Winter Solstice (21st June) 12PM

--- Site 50 - Dunnet Property    Open Space    2030 MP shadows    Interim Metro Review shadow    Additional shadowing

**Figure 4: Cumulative overshadowing impact of Sites 47 and 48 on Site 50 – 12pm on winter solstice**



--- Site 50 - Dunnet Property    Open Space    2030 MP shadows    Interim Metro Review shadow    Additional shadowing

**Figure 5: Cumulative overshadowing impact of Sites 47 and 48 on Site 50 – 3pm on winter solstice**

**Dunnet Group recommendation**

As a result of the abovementioned shadow impacts that will be caused by the proposed SSDA, and the cumulative impact when also considering Site 48, it is strongly recommended that a sun access plane be adopted for Building 1 contained within the proposed Concept SSDA. The sun access plane is recommended

for this building given its proximity to the site, and the vast 63.75m width of its tower form which results in considerable shadow impacts on Site 50 that would impact its development potential.

This sun access plane should be suitably designed to minimise overshadowing of Site 50, in accordance with the recommended sun access plane designed by Curzon + Partners, which will be submitted under a separate cover. Dunnet Group recommends that the sun access plane either be included as a condition of consent for the proposed Concept SSDA on Site 47, or alternatively it could be embedded as design guidance with associated objectives in the Design Guidelines included at Appendix M of the SSDA.

**Summary and conclusion**

We thank DPE for considering this submission as part of the exhibition process and we request due regard is had to the concerns raised in this submission.

Should you have any queries regarding this submission letter, please do not hesitate to contact the undersigned.

Sincerely,

**Bob Dunnet**

**Owner**

**Dunnet Group**