



Mr Simon Wilkes
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Dear Mr Wilkes

Modification 14 to MP08_0098 Star City Casino, Pyrmont

Thank you for your letter outlining alterations to the Star City Casino, Pyrmont under a proposed Modification 14 (MOD 14) to MP08_0098 and a request that the application be submitted without the requirement for further Environmental Assessment Requirements.

From the information provided, the Department understands MOD 14 involves infill development to provide additional floor areas for gaming, upgrade and relocation of the Hotel entry and lobby, new retail facilities, new vertical access and upgrades to infrastructure and back of house facilities.

The assessment requirements for MOD 14 appear generally consistent with those already issued for MOD 13 although, as a result of the increase in gaming floor area the Department requests that the following additional assessment is provided:

Social and Economic Impacts

- prepare a Social Impact Assessment which details the social benefits and disbenefits of the proposal; and
- outline the economic benefits and disbenefits of the proposal.

Please note the Independent Liquor and Gaming Authority may wish to provide further comment or request specific details to be addressed within the Social Impact Assessment.

Prior to exhibiting the Environmental Assessment that you submit for the project the Department will review the document to determine if it adequately addresses the relevant environmental assessment requirements. The Department may consult with other relevant government agencies in making this decision. Please contact the Department at least 2 weeks prior to lodging documentation for review

Your contact officer, Michele Nettlefold, can be contacted on 02 9228 6378 or via email at michele.nettlefold@planning.gov.au.

Yours sincerely,

Ben Lusher
Director
Key Sites Assessments

Secretary's Environmental Assessment Requirements

Section 75W of the *Environmental Planning and Assessment Act 1979*

Application number	MP08_0098 (MOD 13)
Modification	New hotel and residential tower, and alterations and additions to existing building
Location	Star City Casino and Switching Station site, Pyrmont
Proponent	Star Entertainment Group Limited
Date modified	9 May 2016
Expiry date	If the modification application is not exhibited within 2 years after this date, the proponent must consult further with the Secretary in relation to the preparation of the environmental assessment.
General Requirements	The modification application must include: • An executive summary. • A description of the existing and surrounding environment. • A thorough description and justification of the proposal, including: - o a detailed justification for the increases in height, GFA and additional car parking; and - o description of the public benefits arising from the proposal. • Consideration of any statutory provisions (see below). • A detailed assessment of the key issues specified below, including: - o a description of the existing environment; and - o an assessment of the potential impacts of the modifications, including cumulative impacts. • An amendment to the approved Statement of Commitments (where relevant). • A conclusion justifying the proposal, taking into consideration the environmental impacts of the proposal, and the suitability of the site.
Key issues	The modification application shall: 1. Relevant EPIs, Strategies, Plans and Guidelines • Address the provisions of State environmental planning policies, strategies, plans and guidelines that would apply as if those provisions applied to the carrying out of the project, including the following: - o <i>State Environmental Planning Policy (State & Regional Development) 2011</i>; - o <i>State Environmental Planning Policy No 55 – Remediation of Land</i>; - o <i>State Environmental Planning Policy (Infrastructure) 2007</i>; - o <i>State Environmental Planning Policy No 65 Design Quality of Residential Apartment Development</i>; - o <i>State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004</i>; - o <i>Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005 and Foreshores and Waterways DCP</i>; - o <i>Sydney Local Environmental Plan 2012, Sydney Development Control Plan 2012 and Draft City of Sydney Development Contributions Plan 2015</i>; - o <i>NSW State Priorities</i>; - o <i>A Plan for Growing Sydney</i>; - o <i>NSW Long Term Transport Master Plan</i>; - o <i>Sydney City Centre Access Strategy 2013</i>; - o <i>Sydney's Cycling Future 2013</i>;

- o *Sydney's Walking Future 2013; and*
 - o *Sydney's Light Rail Future 2013;*
 - Demonstrate that the proposal has limited environmental impacts beyond those already assessed for project approval MP 08_0098 and any subsequent modifications to that approval.
- 2. Built Form and Design Excellence**
- Demonstrate design excellence:
 - o through undertaking a competitive design process in accordance with the City of Sydney Competitive Design Policy. This requires that a Design Excellence Strategy is endorsed by the Secretary prior to the commencement of the competitive design process; or
 - o through an alternative design excellence process endorsed in writing by the Secretary which includes:
 - a design brief requiring a minimum of three alternative design options for the proposal;
 - establishment of a design review panel to review each alternative and inform the preferred design; and
 - mechanisms to retain the architect during the design and construction of the scheme.
 - Clearly present a robust urban design analysis that evaluates alternative options for the location of the hotel and residential tower and demonstrates how the preferred built form and envelope minimises environmental impacts and provides the best design solution for the site and local area.
 - Address the height, bulk and scale of the proposed development within the context of the locality.
 - Address visual impact when viewed from the public domain and key vantage points surrounding the site.
 - Address design quality, with specific consideration of the overall site layout, siting and design, orientation, vistas and connectivity, street activation, open spaces and edges, façades, massing, setbacks and building articulation.
 - Provide a table identifying the proposed development's different land uses including a floor-by-floor breakdown of GFA, total GFA and site coverage.
- 3. Amenity**
- Address and outline design principles incorporated into the development in terms of sunlight/overshadowing, natural ventilation, wind impacts, reflectively, visual and acoustic privacy, and safety and security.
 - Demonstrate consistency with the requirements of SEPP 65 and the Apartment Design Guide.
- 4. Visual Impacts**
- A visual impact assessment must be undertaken to identify the visual changes and view impacts of the development. Refer to the attached **Plans & Documents Section**.
- 5. Traffic, Car Parking, Transport and Access**
- The modification application shall include a Traffic and Transport Impact Assessment that:
 - o evaluates daily and peak hour vehicle, public transport and pedestrian movements likely to be generated by the development (construction and operation) including peak traffic movements;
 - o models and assesses the current and future performance of key intersections providing access to the site under 'project and 'no project' scenarios, and identifies any upgrades (road/intersections)

	required as a consequence of the proposal; - o evaluates the cumulative impacts and potential conflict with traffic movements generated by existing and approved development in the vicinity of the site; - o assesses the ability of existing and future public transport networks (including light rail, ferry and bus networks) to accommodate the forecast number of trips generated by the proposal; - o assesses and details the impacts on the light rail (including passenger access to platforms) to ensure the development does not adversely impact on its safe and efficient operation; - o outlines existing public transport services and opportunities for greater usage for workers and visitors; - o details sustainable travel initiatives for workers and visitors, particularly for the provision of end-of-trip facilities; - o details existing and proposed vehicular access and car parking arrangements for workers and visitors (cars, coaches/buses & taxi ranks), including compliance with parking codes and Australian Standards; - o details of the potential impacts to access and manoeuvring in the bus interchange; - o identifies pedestrian and cycle connections/circulation, particularly the cycle network identified in the Sydney City Centre Access Strategy; - o details access arrangements for emergency and service vehicles, including loading dock arrangements; and - o in relation to construction traffic: - o outlines anticipated daily and peak hour light and heavy vehicle movements to and from the site; - o outlines car parking and work zones for construction traffic; - o outlines access arrangements for workers to/from the site, emergency vehicles and service vehicle movements; - o outlines measures to mitigate construction traffic impacts on vehicles, pedestrians, cyclists and public transport operations; and - o outlines measures to maintain pedestrian and cyclist safety during construction. 6. Public Domain and Public Access • Identify proposed streetscape, open space, public domain and key pedestrian linkages with and between other public domain spaces, existing and proposed buildings and surrounding areas. • Identify and assess the impacts of any proposed building identification signage, including safety impacts on traffic and public transport operations. • Identify important sight lines and visual connectivity to and through the site. • Identify any change to the use and/or layout of the site and development and associated impacts on circulation movements, access and linkages. • Address cumulative management of proposed access arrangements. • Outline specific design features: - o footpaths and pavements, roads and/or rights of carriageways; - o materials and finishes; - o public art; - o furniture and fixtures; - o street lighting, pedestrian lighting and feature lighting; - o edges, screens and fences; - o walls, embankments and mounds; - o steps, ramps, vehicle crossings, decks and pathways; - o services where affected, utility poles, and service pits;
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	- o civil and stormwater infrastructure; - o tree planting; - o mass planting beds, planter boxes and individual plantings; and - o bicycle parking. 7. Ecologically Sustainable Development (ESD) • Identify how the development will incorporate best practice ESD principles in the design, construction and ongoing operation phases of the development. 8. Heritage and Aboriginal Heritage • Prepare Historic Heritage and Aboriginal Heritage impact assessments. 9. Contamination • Demonstrate compliance with the requirements of SEPP 55. 10. Infrastructure • Detail any infrastructure proposed to service the development and demonstrate that the site can be suitably serviced. • Detail the existing infrastructure on site, and identify any possible impacts on infrastructure (particularly the light rail) arising from the construction of the proposed development. • Where the proposed works affect existing infrastructure, the application should detail any mitigation works proposed, including service relocations. • Prepare an Infrastructure Management Plan. The applicant shall provide information on the required water and waste water services, electricity and gas and any augmentation of Sydney Water and RMS and Light Rail infrastructure that may be required for the proposed development. 11. Air, Noise and Odour • Address potential air quality, noise and odour impacts, in particular during the construction and operation of the development and appropriate mitigation measures. 12. Drainage and Stormwater • Prepare a Stormwater and Drainage Assessment to assess the impacts of the proposal on surface and groundwater hydrology and quality. • Identify appropriate water quality management measures focussing on the management of the impacts from the proposed works. • Prepare an Integrated Water Management Strategy. This should include water, stormwater and wastewater management, including any re-use and disposal requirements, demonstration of water sensitive urban design and any water conservation measures. 13. Staging • Details regarding the staging of the proposed development. 14. Prescribed Airspace for Sydney Airport • Identify any impacts of the proposal on the prescribed airspace for Sydney Airport, including impacts of cranes required for construction. 15. Developer Contributions • Scope of developer contributions proposed in accordance with the Draft Sydney Contributions Plan 2015.
Deemed refusal period	60 days

Consultation	During the preparation of the modification application, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners. In particular you must consult with: • Commonwealth Department of Infrastructure and Regional Development; • City of Sydney Council; • Roads and Maritime Services; • Transport for NSW (CBD Coordination Office); • Sydney Light Rail; • Sydney Trains; • Office of Liquor, Gaming and Racing; • Heritage Council; • Sydney Water; • Ausgrid; • Local heritage group/s; and • Local Aboriginal Land Council and relevant stakeholders.
Further consultation after 2 years	If you do not lodge the modification application for the proposal within 2 years of the issue date of these SEARs, you must consult further with the Secretary in relation to the preparation of the application.
References	The assessment of the key issues listed above must take into account relevant guidelines, policies, and plans. While not exhaustive, the following attachment contains a list of some of the guidelines, policies, and plans that may be relevant to the environmental assessment of this proposal.

Policies & Guidelines

Aspect	Policy /Guideline/Plan
Design and Amenity	
	City of Sydney Competitive Design Policy
	Apartment Design Guide
Air Quality & Health	
	Protection of the Environment Operations (Clean Air) Regulation 2002
	Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (OEH)
	Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (OEH)
	Protection of the Environment operation (Clear Air) Regulation
	Environmental Health Risk Assessment Guidelines for Assessing Human Health Risks from Environmental Hazards (Department of Health and Ageing and Health Council)
	Assessment and Management of Odour from Stationary Sources in NSW: Technical Framework 2006
Water	
	Managing Urban Stormwater: Treatment Techniques (OEH)
	Managing Urban Stormwater: Source Control (OEH)
	Managing Urban Stormwater: Soils & Construction (Landcom)
	Technical Guidelines: Bunding & Spill Management (OEH)
	National Water Quality Management Strategy: Australian Guidelines for Fresh and Marine Water Quality (ANZECC/ARMCANZ)
	Using the ANZECC Guideline and Water Quality Objectives in NSW (OEH)
	Approved Methods for the Sampling and Analysis of Water Pollutants in NSW (OEH)
Noise	
	NSW Industrial Noise Policy (OEH)
	Environmental Criteria for Road Traffic Noise (NSW EPA)
	Environmental Noise Control Manual (OEH)
	Development Near Rail Corridors and Busy roads – Interim Guideline 2008.
Waste	
	Waste Avoidance and Resource Recovery Strategy (Resource NSW)
	Waste Classification Guidelines 2008 (OEH)
Transport	
	Guide to Traffic Generating Developments (RMS)
	Ausroads Guide to Road Design
	Sydney City Centre Access Strategy (2013)
	NSW Long Term Master Plan (2012)
	Barangaroo Integrated Transport Plan (2012)
	Ausroads Guide to Traffic Management – Part 12 – Traffic Impacts of Development
	Development Near Rail Corridors and Busy Roads – Interim Guideline
	National Airports Safeguarding Framework
Visual	See below
Contamination	
	The RAP must be prepared in accordance with Managing Land Contamination, Planning Guidelines, SEPP 55 – Remediation of Land 1998 and Guidelines produced or approved under section 105 of the <i>Contaminated Land Management Act 1997</i> .

Plans & Documents

Plans and Documents

The following plans and relevant documentation shall be submitted;

1. An **existing site survey plan** drawn at an appropriate scale illustrating:
 - the location of the land, boundary measurements, area (sqm) and north point;
 - the existing levels of the land in relation to buildings and roads;
 - location and height of existing structures on the site;
 - location and height of adjacent buildings and private open space; and
 - all levels to be to Australian Height Datum (AHD).
2. A **locality/context plan** drawn at an appropriate scale should be submitted indicating:
 - significant local features such as parks, community facilities and open space and heritage items;
 - the location and uses of existing buildings, shopping and employment areas; and
 - traffic and road patterns, pedestrian routes and public transport nodes.
3. **Drawings** at an appropriate scale illustrating:
 - the location of any existing building envelopes or structures on the land in relation to the boundaries of the land and any development on adjoining land;
 - detailed plans, sections and elevations of the concrete batching plant;
 - the height (AHD) of the proposed development in relation to the land; and
 - any changes that will be made to the level of the land by excavation, filling or otherwise.
4. **Landscape plan** illustrating treatment of open space areas on the site.
5. **Shadow diagrams** showing solar access to the site and surrounding areas at summer solstice (Dec 21), winter solstice (June 21) and the equinox (March 21 and September 21) at 9.00 am, 12.00 midday and 3.00 pm.
6. **3D modelling** and a physical model of the proposed modifications shall be prepared in accordance with City of Sydney's requirements.
7. **Visual Impact Assessment:**
The visual impact assessment, including focal lengths, must be done in accordance with Land and Environment Court requirements.

Visual assessment methodology

- The consultant's methodology should be explicit. This may include a flow-chart indicating how the analysis is to be undertaken, or a narrative description of the proposed sequence of activities.
- As part of the methodology, the consultant should provide, and explain, criteria for assessment relevant to the site, local context and proposed built form and public domain outcomes. A rationale should be provided for the choice of criteria. Criteria must include reference to the planning framework.
- Visual catchment should be defined and explained (see below).
- An assessment matrix should be produced including number of viewers, period of view, distance of view, location of viewer to determine potential visual impact - i.e. high, medium or low.

Visual catchment

- Potential visual catchments and view locations, including contours (areas from which the development is visible) should be identified. This must include, but is not limited to Pyrmont Street, Pirrama Road, Heritage Walk, Jones Bay Road, Darling Island Road, Sydney Observatory, Sydney Observatory Park, Darling Harbour, Sydney Harbour Bridge, Pyrmont Bridge, Pyrmont Bay Park, Darling Island, Jones Bay Wharf, Barangaroo, East Balmain, King Street Wharf, Millers

	Point, Watermark Building, 2 Jones Bay Road, 24 & 26 Point Street and 88 John Street. • Categories of views (e.g. from the water, from public open space, from key streets, from main buildings and from key heritage items) should be defined. • Photos are required for representative view categories, plotted on a map. Visual material • Reference to be made to site analysis. • Provide key plan indicating where viewpoints are located and narrative explaining why these have been selected. • The modified and approved built form should be illustrated in the context of the visual catchment to enable assessment of the visual impact. • The location of cross-sections should be clearly shown on a key plan and the choice of positions explained. The cross sections should be shown in the context of the visual catchment. • Vertical exaggeration should provide an accurate rather than 'flattened' impression of buildings in the context of the visual catchment. • A key plan must be provided for photomontages. In addition, the choice of locations should be explained. Photomontages should be provided for close as well as distant views. • Assessment must benchmark against the existing situation and currently approved plans. • Photomontages to be provided for key viewpoints from all directions, and from several positions within the visual catchment. • As above, support visual evidence such as cross sections to be drawn to realistic scales and shown in context. • A comparison of 'before', 'approved' and 'proposed' is fundamental to a visual impact assessment, therefore the visual impact assessment (A3 in size) should be undertaken using human eye focal lengths (50mm at 35mm FX format and 46° angle of view) from long range, medium range and short range positions so that they can be assessed with respect to visibility, visual absorption capacity and visual impact rating, as well as a comparison analysis with the approved project.
Documents to be submitted	• 1 hard copy and 1 electronic copy of all the documents and plans for the Test of Adequacy; • 10 hard copies of the documents (once the application has been determined adequate); • 10 hard copies of the plans at A3 and 2 hard copies of the plans at A0 or A1 (whichever is to scale); • 4 copies of photomontage boards at A0 in size illustrating east/west/south and north perspectives of the proposal; and • 10 copies of all the documentation and plans on CD-ROM or USB disk (PDF format), not exceeding 10Mb in size.