

19 August 2009

Mr Daniel Keary
Department of Planning
23-33 Bridge Street
SYDNEY NSW 2000

Dear Daniel,

**Star City 'Project Star' – Pirrama Road Frontage, Pyrmont
Section 75W Application to Modify Major Project No. 08_0098**

1 Introduction

We are writing on behalf of Brookfield Multiplex, the prospective builder of the approved infill works to the Pirrama Road façade of the Star City Casino in Pyrmont. This letter supports an application to modify Major Project No. 08_0098 pursuant to Section 75W of the Environmental Planning and Assessment Act, 1979 (EP&A Act) on behalf of the Proponent for the project, Sydney Harbour Casino Properties Pty Ltd.

This letter provides:

- A brief description of the site and context.
- A summary of the approved project and details of the proposed modifications thereto.
- Justification for the proposed modifications
- Environmental Assessment of the proposed modifications.
- Consideration of the proposed modifications in terms of the matters raised in the correspondence of the Department of Planning (dated 17/11/08) and the Design Review Panel (dated 21/11/08) in relation to the original project application.

2 Background

Following the recent Major Project approval for substantial alterations and additions to the existing Star City Casino, Brookfield Multiplex has been selected as the preferred tenderer to construct the project. Brookfield Multiplex's tender included an alternative façade designed by Fitzpatrick + Partners Architects for that part of the project relating to the enclosure of the existing stairs to Pirrama Road.

The approved façade design to Pirrama Road was the outcome of an iterative design review panel process whereby successive modifications of the design were made to satisfy the concerns of the design review panel appointed to the project by the Minister for Planning. While technically addressing the specific issues raised, the eventual design compromised the design objectives of Star City.

In preliminary consultation the Director of Urban Assessments, Department of Planning advised that any request to modify the project approval should be made with reference to the matters raised in the Department's correspondence dated 17 November 2008 and 21 November 2008, including the comments made by the Design Review Panel.

3 The Site and Context

The site comprises the irregularly proportioned street block bounded by Edward Street, Pymont Street, Union Street, Pirrama Road and Jones Bay Road, Pymont. It accommodates the existing Star City Casino, which comprises:

- A 10,500m² main gaming floor.
- 3,800m² of retail space.
- 11 restaurants and 10 bars.
- 2 theatres.
- 480 hotel rooms / serviced apartments.
- A 900 person ballroom / conference facility.
- Basement parking for 2,500 cars.

The site also accommodates the light rail line and the 'Casino' light rail station and bus interchange, which are all housed within the Casino building, adjacent to the Pirrama Road frontage.

3.1 Legal Description

The site is leased by Sydney Harbour Casino Properties Pty Ltd from the Casino Control Authority, and has a total area of 39,206m², including the 4,756m² switching station site. The consent of the Casino Control Authority to the lodgement of this application is provided at **Attachment A**.

The site is legally described as:

- Lot 121 DP828957 (Former Switching Station site).
- Lots 300, 301 and 302 in DP 873212 (Main site).
- Lot 1 DP 867854 and Lot 201 DP 867855 (Driveway which exits near Channel 7).

3.2 Local Context

The immediate context of the site is highly varied in terms of its land use mix, built form and character. Historically, Pymont's urban pattern has been characterised by smaller residential forms on the ridge, with larger industrial, and now commercial building footprints occupying the flatter areas around the shoreline. This is consistent with the role of the Pymont precinct as an inner urban mixed use area, providing an immediate transition zone between the high-rise commercial core of the CBD and the suburban expanse to the west.

Given that the proposed modifications only affect the Pirrama Road (north-eastern) frontage of the site, the following provides a summary of key development to the east of the site:

- To the north-east of the site are Jones Bay Wharf, Darling Island and Darling Harbour Wharf 10, which comprise a number of new buildings and refurbished former maritime/storage buildings. These buildings are now used for a mix of commercial office and residential uses, and are set amongst a number of landscaped foreshore open spaces.
- To the south-east is a street block of mixed retail and commercial uses characterised by the modern five and eight storey office buildings on the opposite side of Edward Street, and a lower three storey office building, remnant heritage listed pubs and terrace house buildings.
- To the east, opposite Pirrama Road, is Pymont Bay Park and Pymont Bay waterfront.
- Further east is Darling Harbour and the Sydney CBD, which has a direct visual connection to the Casino.

4 Summary of Approved Development

On 27 January 2009, the Minister approved Major Project No. 08_0098 for the carrying out of:

- *‘Construction of a 10 storey hotel above a 3 storey podium containing ancillary retail, gaming and conference facilities on the currently vacant Switching Station site;*
- *Additional basement car parking on the Switching Station site to be accessed via the existing Casino complex car park. Note the maximum number of car parking spaces across the whole site is not to exceed 3000;*
- *Redevelopment of the retail arcade through the ground floor level of the complex, linking Pymont Bay park to the intersection of Union and Pymont Streets, and to Jones Bay Road;*
- ***Redevelopment of the eastern (Pirrama Road) frontage of the Casino building currently occupied by multiple external stairs, to contain additional restaurants, retail outlets, gaming space, other entertainment and tourist related facilities, a new entry and a driveway providing a new vehicular drop-off to the Casino; and***
- *Works to the exterior of the existing Casino tower buildings.’*
(our emphasis)

Images of the approved design of the Pirrama Road frontage of the Casino are provided below.



Picture 1 – Photomontage of approved Pirrama Road Façade



Picture 2 – Artist's impression of approved Pirrama Road Façade

5 Proposed Modifications

This application seeks approval for an amended scheme which represents a coordinated reconsideration of the various design influences which resulted in the approved scheme. While the amended scheme adopts a simplified and more open approach to the ground plane, porte cochere, façade design and entry journey, no change is proposed to the overall composition of uses, floor space or internal configuration of spaces. The primary purpose of the proposed amendments is to improve the Pirrama Road façade, resulting in some minor changes to the previously approved spaces behind the façade line and rationalisation of the ground level.

The proposed modifications to the approved design include:

- Removal of visual obstructions between Pirrama Road and the bus/rail interchange at ground level.
- Consolidation of the two approved porte cochere traffic lanes into a single drop off point.
- Replacement of the grand entry stair to Pirrama Road with two generally perpendicular escalators.
- Relocation of the Casino 'blue-line' from the arcade level up to the main gaming level.
- Rationalisation of the arrival journey and visual connection from the arcade level to upper Casino levels.
- Rationalisation of the building façade to create a singularity of glazed expression, defined by large operable blades, and a defined central entry element (refer to photomontages below).

As outlined below, the proposed modifications do not result in any change to the following approved aspects of the project:

- Land use composition – no change.
- Floor space – no change (confirmed by Hard & Forester in their letter included at **Attachment B**).
- Building envelope (i.e. height, setbacks) – no change.
- Car parking provision – no change.



Picture 3 – Photomontage of proposed Pirrama Road Façade (day view)



Picture 4 – Photomontage of proposed Pirrama Road Façade (night view)

Reduced copies of the proposed architectural drawings (as modified) are included at **Attachment C**. A copy of the proposed landscape plan (as modified) and statement are included at **Attachment D**. Photomontages of the proposed Pirrama Road façade are included at **Attachment E**.

As shown below, the proposal does not result in any changes to the approved land use composition:

Level	Approved Uses	Proposed Uses	Difference
Level B2	Public Domain, Retail	Public Domain, Retail	No change
Level 00	Retail	Retail	No change
Level 01	Gaming, Bar	Gaming, Bar	No change
Level 02	Restaurant, Nightclub	Restaurant, Nightclub	No change
Level 03	Roof Entertainment Deck	Roof Entertainment Deck	No change

It is noted that there are no changes proposed to the approved Statement of Commitments for the project dated December 2008.

The proposed modifications will result in amendments to the following two approval conditions of MP 08_0098 as shown below (note deleted text is shown 'strikethrough' while additional text is underlined):

- Condition A2 Development in Accordance with Plans*

The development will be undertaken in accordance with the Environmental Assessment dated September 2008 prepared by Urbis, subsequent Preferred Project Report dated December 2008 prepared by Urbis, and Section 75W letter dated 19 August 2009 prepared by Urbis, and the following drawings prepared by Fitzpatrick + Partners, The Buchan Group, Cox Richardson Architects and Tract Consultants:

Drawing Number	Revision	Name of Plan	Date
DA-AC.153	02	Perspective Rendering View – Pirrama Road Entry Daytime	02/12/08
<u>DA-016</u>	<u>1</u>	<u>Perspective Rendering View - Pirrama Road Entry Daytime</u>	<u>14/08/09</u>
DA-AC.199	00	Perspective View of Pirrama Road	02/12/08
<u>DA-017</u>	<u>1</u>	<u>Perspective View of Pirrama Road</u>	<u>14/08/09</u>
DA-AC.200	04	Level Basement B05 Floor Plan	02/12/08
<u>DA-002</u>	<u>1</u>	<u>Level Basement B05 Floor Plan</u>	<u>14/08/09</u>
DA-AC.204	02	Level Basement B04 Floor Plan	02/12/08
<u>DA-003</u>	<u>1</u>	<u>Level Basement B04 Floor Plan</u>	<u>14/08/09</u>
DA-AC.202	02	Level Basement B03 Floor Plan	02/12/08
<u>DA-004</u>	<u>1</u>	<u>Level Basement B03 Floor Plan</u>	<u>14/08/09</u>
DA-AC.203.1	00	Level B02 – Pirrama Road & Entry Water Front Works	02/12/08
<u>DA-005</u>	<u>1</u>	<u>Level B02 - Pirrama Road & Entry Water Front Works</u>	<u>14/08/09</u>
DA-AC.203	03	Level B01 – Pirrama Road & Entry Water Front Works	02/12/08
<u>DA-006</u>	<u>1</u>	<u>Level B02 - Pirrama Road & Entry Water Front Works</u>	<u>14/08/09</u>
DA-AC.204	03	Level B01 – Pirrama Road & Entry Water Front Works	02/12/08

Drawing Number	Revision	Name of Plan	Date
<u>DA-007</u>	<u>1</u>	<u>Level B01 - Pirrama Road & Entry Water Front Works</u>	<u>14/08/09</u>
<u>DA-AC.205</u>	<u>03</u>	<u>Level 00 Pyrmont Street Floor Plan (Retail)</u>	<u>02/12/08</u>
<u>DA-008</u>	<u>1</u>	<u>Level 00 Pyrmont Street Floor Plan (Retail)</u>	<u>14/08/09</u>
<u>DA-AC.206</u>	<u>03</u>	<u>Level 01 Floor Plan (Main Gaming)</u>	<u>02/12/08</u>
<u>DA-009</u>	<u>2</u>	<u>Level 01 Floor Plan (Main Gaming)</u>	<u>18/08/09</u>
<u>DA-AC.207</u>	<u>03</u>	<u>Level 02 Floor Plan (Terrace)</u>	<u>02/12/08</u>
<u>DA-010</u>	<u>2</u>	<u>Level 02 Floor Plan (Terrace)</u>	<u>18/08/09</u>
<u>DA-AC.208</u>	<u>02</u>	<u>Level 03 Covered Deck & Roof Plan</u>	<u>02/12/08</u>
<u>DA-011</u>	<u>1</u>	<u>Level 03 Covered Deck & Roof Plan</u>	<u>14/08/09</u>
<u>DA-AC.209</u>	<u>02</u>	<u>Level 04 Covered Deck & Roof Plan</u>	<u>02/12/08</u>
<u>DA- AC.209</u>	<u>02</u>	<u>Level 04 Covered Deck & Roof Plan</u>	<u>14/08/09</u>
<u>DA-AC.210</u>	<u>02</u>	<u>Level 05 Roof Level Plan</u>	<u>02/12/08</u>
<u>DA-AC.210</u>	<u>02</u>	<u>Level 05 Roof Level Plan</u>	<u>14/08/09</u>
<u>DA-AC.211</u>	<u>02</u>	<u>Level Roof Plan</u>	<u>02/12/08</u>
<u>DA-AC.211</u>	<u>02</u>	<u>Level Roof Plan</u>	<u>14/08/09</u>
<u>DA-AC.401</u>	<u>02</u>	<u>Pirrama Rd Street Elevations</u>	<u>02/12/08</u>
<u>DA-012</u>	<u>1</u>	<u>Pirrama Rd Street Elevations</u>	<u>14/08/09</u>
<u>DA-AC.402</u>	<u>02</u>	<u>Jones Bay Rd - Pyrmont Street Elevations</u>	<u>02/12/08</u>
<u>DA-AC.403</u>	<u>02</u>	<u>Edward - Union Street Elevations</u>	<u>02/12/08</u>
<u>DA-013</u>	<u>1</u>	<u>Edward - Union Street Elevations</u>	<u>14/08/09</u>
<u>DA-AC.404</u>	<u>00</u>	<u>Pirrama Road Rendered Elevations</u>	<u>02/12/08</u>
<u>DA-AC.500</u>	<u>02</u>	<u>Sections A-A & B-B</u>	<u>02/12/08</u>
<u>DA-014</u>	<u>1</u>	<u>Sections A-A & B-B</u>	<u>14/08/09</u>
<u>DA-AC.501</u>	<u>02</u>	<u>Section C-C</u>	<u>02/12/08</u>
<u>DA-015</u>	<u>1</u>	<u>Section C-C</u>	<u>14/08/09</u>
<u>DA-AC.160</u>	<u>02</u>	<u>External Materials and Finishes</u>	<u>02/12/08</u>
<u>DA-019</u>	<u>1</u>	<u>External Materials and Finishes</u>	<u>14/08/09</u>
<u>DA-020</u>	<u>1</u>	<u>Pirrama Rd Façade Details</u>	<u>18/08/09</u>
<u>DA-L201</u>	<u>D</u>	<u>Landscape & Urban Design Landscape Plan Streetscape & Roof Terraces</u>	<u>01.12.08</u>
<u>DA-L201</u>	<u>F</u>	<u>Landscape & Urban Design Landscape Plan Streetscape & Roof Terraces</u>	<u>18.08.09</u>
<u>DA-1500</u>	<u>00</u>	<u>Existing Tower Facades</u>	<u>27.6.2008</u>
<u>DA-1002</u>	<u>00</u>	<u>Site Plan</u>	<u>27.06.2008</u>
<u>DA-1011</u>	<u>00</u>	<u>Basement Level 1 Plan.</u>	<u>27.6.2008</u>
<u>DA-1012</u>	<u>00</u>	<u>Basement Level 2 Plan</u>	<u>27.6.2008</u>
<u>DA-1013</u>	<u>00</u>	<u>Basement Level 3 Plan</u>	<u>27.6.2008</u>

Drawing Number	Revision	Name of Plan	Date
DA-1014	00	Basement Level 4 Plan	27.6.2008
DA-1020	01	Ground Floor Plan	01.07.2008
DA-1021	01	Level 1 Floor Plan	01.07.2008
DA-1022	01	Level 2 Floor Plan	01.07.2008
DA-1023	01	Level 3 Floor Plan	0107.2008
DA-1024	00	Level 4 & 5 Floor Plan	27.06.2008
DA-1025	00	Level 6 & 7 Floor Plan	27.06.2008
DA-1026	00	Level 8 & 9 Floor Plan	27.06.2008
DA-1027	00	Level 10 & 11 Floor Plan	27.06.2008
DA-1028	00	Level 12 & 13 Floor Plan	27.06.2008
DA-1030	00	Roof Plan	27.06.2008
DA-3001	01	Edward/Pymont Street Elevations	02.07.2008
DA-3002	01	Union Street Elevation	02.07.2008
DA-4001	01	Section A-A	01.07.2008
DA-4002	01	Section B-B	01.07.2008
DA-4003	01	Section C-C	01.07.2008

- **Condition A3 Development in Accordance with Documents**
The development will be undertaken in accordance with the following documents:
 - (1) *Environmental Assessment Report prepared by Urbis on behalf of Sydney Harbour Casino Properties Pty Ltd, September 2008;*
 - (2) *Architectural Plans prepared by Cox Richardson and The Buchan Group and Fitzpatrick + Partners, various dates;*
 - (3) *Preferred Project Report prepared by Urbis dated December 2008, as amended by Section 75W letter prepared by Urbis dated 19 August 2009;*
 - (4) *Transport Impact of Star City Redevelopment prepared by Arup dated September 2008 and supplementary report dated December 2008, as amended by Traffic Report Addendum prepared by Arup dated 11 August 2009;*
 - (5) *Limited Phase 1 Contamination Assessment prepared by Douglas Partners dated June 2008;*
 - (6) *Heritage Impact Statement prepared by Urbis dated September 2008;*
 - (7) *Visual Impact Assessment prepared by GM Urban Design & Architecture Pty Ltd dated September 2008;*
 - (8) *Pedestrian Wind Environment Statement prepared by Windtech Consultants Pty Ltd dated September 11 2008, as amended by Wind Environment Statement prepared by Windtech Consultants dated 12 August 2009;*

- (9) *Crime Prevention Through Environmental Design report prepared by Urbis dated June 2008, as amended by Addendum to CPTED Assessment prepared by Urbis dated 10 August 2009;*
- (10) *Traffic Impact of Star City Redevelopment prepared by ARUP dated September 2008, as amended by Traffic Report Addendum prepared by Arup dated 11 August 2009;*
- (11) *Acoustic Assessment Report prepared by Arup Acoustics dated September 2008, as amended by Acoustic Statement prepared by ARUP dated 14 August 2009;*
- (12) *Assessment of Reflected Solar Glare from Glazed Facade Pirrama Road prepared by Bassett Consulting Engineers dated 8 September 2008 and supplementary report dated 12 December 2008, as amended by Reflectivity Statement prepared by AECOM Australia dated 13 August 2009;*
- (13) *Environmentally Sustainable Report prepared by Cundall dated September 2008, as amended by ESD Statement prepared by Cundall dated 12 August 2009;*
- (14) *Social Impact Assessment of Project Star prepared by Urbis dated 27 June 2008;*
- (15) *Economic Impact Assessment prepared by Urbis dated 30 June 2008;*
- (16) *Accessibility Review prepared by Morris-Goding Accessibility Consulting dated 10 September 2008, as amended by Accessibility Statement prepared by Morris-Goding dated 12 August 2009;*
- (17) *Preliminary Construction Management Plan prepared by APP Corporation Pty Limited dated September 2008;*
- (18) *Building Services Report prepared by Bassett Consulting Engineers dated 1 August 2008;*
- (19) *Hydraulic Services Report prepared by Steve Paul & Partners dated 25 June 2008;*
- (20) *BCA Capability Statement prepared by Philip Chun & Associates dated 11 September 2008, as amended by BCA Capability Statement prepared by Philip Chun Consulting dated 13 August 2009.*

6 Statutory Context

6.1 Part 3A of the Environmental Planning & Assessment Act

Part 3A of the EP&A Act relates to Major Infrastructure and other Projects, and applies to projects that are identified in a State Environmental Planning Policy (SEPP) or are considered by the Minister to have State or Regional Significance.

On 27 May 2008, the Minister for Planning formed the opinion that the proposed redevelopment of the Star City site constituted a Major Project under the terms of SEPP (Major Projects) 2005 and authorised the submission of the concept plan for the site. The Minister approved the Major Project application (MP 08_0098) on 27 January 2009.

6.2 Section 75W Modification of Project Approval

Section 75W of the Act allows the proponent to request the Minister to modify approval for a project.

Section 75W also provides for the Director-General to notify the proponent of specific environmental assessment requirements with which the application must comply. The Director of Urban Assessments has advised that the issues raised in the correspondence by the Department of Planning (dated 17 November 2008 and 21 November 2009) constitute the Director General's Environmental Assessment Requirements (DGEARs) for the Section 75W Application.

7 Environmental Assessment

The following environmental assessment addresses the matters raised in the Department's correspondence as well as the relevant matters identified in the DGEARs for the project application.

7.1 Statutory Compliance

The proposed modifications do not result in any changes to the proposals compliance with the following Environmental Planning Instruments (EPIs) and guidelines:

- Environmental Planning and Assessment Act 1979.
- Casino Control Act 1992.
- State Environmental Planning Policy (Major Projects) 2005.
- State Environmental Planning Policy 41 (Casino Entertainment Complex).
- State Environmental Planning Policy (Infrastructure) 2007.
- State Environmental Planning Policy (Temporary Structures and Places of Public Entertainment) 2007.
- Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005.
- Sydney Local Environmental Plan (SLEP) 2005.

7.2 Urban Development Plan for Ultimo Pyrmont

Clause 83(2) of SLEP 2005 requires the consent authority to have regard to the Ultimo Pyrmont Urban Development Plan (UDP) endorsed by the Council on 25 March 2004.

The provisions of the UDP relate to design based development criteria. Table 1 outlines and addresses those provisions in the UDP which are relevant to this application.

Table 1

UDP Provision	The Proposal	Consistent
<i>Facades of new development should relate sympathetically to existing buildings in the vicinity, particularly if they have heritage or streetscape value.</i>	The modern finishes of the Pirrama Road façade will reflect the modern revitalisation of Pyrmont. The overall development will acknowledge the former character of the locality, while celebrating its present and future.	√
<i>Buildings should be in plan and elevation to develop appropriate rhythm, proportions and depth in facades to articulate street edges.</i>	While the extensions along the Pirrama Road frontage provide a rhythm of curved elements that reflect the finer grain of Pyrmont, they adopt a distinctly modern and dynamic expression that deliberately contrasts with the more rigid expression of traditional buildings in the locality.	√
<i>Building treatment must add interest to facades, for example patterned and textured treatment such as string courses, surrounds to openings and masonry detail. New development must complement existing buildings in the vicinity in materials and colours. Generally, facades should have a masonry or rendered character.</i>	The Pirrama Road Façade is proposed to have an almost entirely glazed façade to redress the inward looking character of the existing Casino building, and create a strong visual link between proposed active uses and the foreshore.	√/X
<i>Horizontal elements should relate to existing buildings...;</i>	The proposed modifications do not alter the building envelope or horizontal expression of the approved development.	√

UDP Provision	The Proposal	Consistent
<i>Facades should not contain large unbroken expanses of glass or curtain walling.</i>	See above.	√/X
<i>Reflective glass must not be used.</i>	Glass with a maximum reflectivity index of less than 20% will be used (see Section 7.9).	√
<i>Site identified as a 'Retail and Leisure' node.</i>	The site is only one of three such nodes in the Ultimo/Pyrmont locality, the others being the Sydney Fish Markets and Darling Harbour. The proposed improvements to the Star City entertainment complex will reinforce its role as a significant regional retail and leisure node.	√

7.3 Developer Contributions

Given that the proposed modifications do not result in any changes to the approved floor area, the applicable developer contributions as outlined in Condition B12 of the approval remains unaltered.

7.4 Architecture and Urban Design

The following design statement has been prepared in relation to the proposed modifications by the project architects, Fitzpatrick + Partners:

Design Strategy

The design aim was to create an iconic yet elegant design whilst meeting the particular requirements of the brief. A conscious decision was made to avoid a building that was based upon a theme or a gimmick – these buildings tend to be a sensation for a short period of time, but date very quickly. It was felt that a timeless solution was more appropriate, both for the casino and the surrounding community.

Essentially, the design strategy is to create a large three storey verandah across the Pirrama Road frontage containing a variety of recreational uses visible through a highly transparent operable façade. This design approach is made possible with Sydney's temperate climate – quite different from the typical northern hemisphere approach which essentially a themed and sealed box, animated by artificial lighting.

The proposed design creates a new, clearly defined object building. This structure is to be visually independent from the existing building behind whilst reflecting the expressive curves of the Cox design. This approach allows the new structure to be its own distinctive element with its own details and materials appropriate to current construction technology, in the spirit of the age. In plan, this new building is formed from a series of generous symmetrical curves, with a firm axial focus on the existing main glass cupola at the centre of the site. The Pirrama Road facade is then shaped to form a generous concave pocket of space at the centre of the site, defining the key entry point. The two wings on either side provide more efficient spaces for the key internal activities within.

Pirrama Road Facade

The Pirrama Road elevation is a singular dramatic curved gesture which flows effortlessly along the entire frontage. It is a finely detailed skin of operable vertical glass flags. The floor levels behind are also curved but are independent of the glass screen in front. The glass flag facade will behave in a remarkable way – it will reflect and refract light along its full length as the long curves compress and expand. The glass sheets have rounded corners and all facade fixings and steel work will be curved and rounded silver to provide point reflections and sparkle, reminiscent of a crystal chandelier. Each of the identical glass flags on levels 00 and 02 are automatically adjustable and can open to a maximum of 60 degrees. They are angled away from the inclement southerly wind and weather and face towards the north east. This also serves to improve the acoustic performance of the façade. The glass flags on

the Level 01 Main Gaming Floor will be fixed open to create unenclosed gaming areas. Each of the toughened laminated glass flags overlap one another with integrated seals to provide weather resistance. The open glass flags also allow the cool north easterly breezes into the shaded verandahs during the summer. The result is a building form that is evocative of those found in nature shaped by its context and by the elements.

Ground Level Public Domain

At ground level, the key objectives are to open up and simplify the public domain to allow pedestrians, buses, taxis and the light rail to converge in a single unified space, animated by a water feature and cafes. This allows a relaxed and integrated arrival sequence for all visitors regardless of the particular mode of transport. The pedestrian cross-overs from Pirrama Road have been reduced to only two points, two less than the current proposal. They have also been widened and simplified to create a safer environment. This new drop off will be covered with a glass canopy to provide weather and wind protection to pedestrians.

Circulation

The circulation system has been refined and improved with the introduction of a full height central hub, comprising stairs and escalators, located directly beneath and around the existing glass cupola. This space will become a centre-piece of activity with people moving up, down and around this volume. It provides a new sense of purpose for the existing glass cupola which is a strong and recognisable feature of the existing casino.

The retail through-site link has been reinforced with the relocation of the casino security line up to level one above, out of sight from the public level. There is a reconfigured link stair connecting the ground level and retail floor adjacent to the Lyric theatre. This convenient connection will become a key route through the site.

From ground level there are unobstructed views up into the building levels above, revealing the various activities within. Twin sets of angled escalators, oriented according to their approaches from either direction, bring visitors up to the Level 00 retail level. Visitors arrive in the middle of the atrium space, with views back out to the view of the CBD beyond. Two food and beverage establishments are provided on either side and incorporate outdoor dining and lounge areas with elevated views out toward the city skyline. Ancillary outlets including ATMs and public facilities are located at this level along the rear. The arcade continues beyond into the development, connecting this level with the new hotel, the Lyric Theatre and the Showroom Theatre.

From the retail floor, escalator entry up into the Level 01 Main Gaming Floor is directly ahead via the central escalators. The revised arrangement allows the casino experience to commence at this level, rather than at the retail floor below as visitors arrive at the security line at the top of the escalators. This floor is activated by a new Diamond Bar located in the centre – a buzzing venue with spectacular views over the city. The new unenclosed gaming areas located on the perimeter are entirely open to the outside air with wind protection provided by the large vertical fixed glass flags along the entire length. In the evenings, the lights can be dimmed to provide a spectacular view toward the lights of the city.

The Level 02 restaurant and night venue floor is located above and is accessed by new escalators via the central hub. Visitors are not required to enter the Main Gaming Floor to access this level, as the circulation route remains outside the security line. This floor will contain two large venues including a night club and a new fine dining restaurant. With the operable façade, these spaces can open along the entire perimeter with external seating and entertainment areas with views out over the Sydney CBD.

Sustainable Design

As the building can be naturally ventilated throughout the majority of the year, the carbon footprint will be minimised – there will be reduced need for expensive base building mechanical equipment and the

embodied energy will be reduced through the use of a simple concrete frame and recycled steel facade framing. The low energy, long life, loose fit design approach enables it to be adapted over time into a variety of uses as needs change and evolve. The design has been benchmarked against Greenstar design targets to minimize energy and water consumption.

Summary of Benefits

- *Strong iconic architectural identity*
- *Improved public domain and sense of arrival*
- *Increased facade transparency*
- *Improved internal circulation*
- *Improved views and connectivity*
- *Improved weather and acoustic protection for all levels*
- *Reduced reliance upon mechanical cooling within the void space*
- *Reduced number of vehicle cross-overs for improved safety*
- *New water feature at the front entrance'*

7.5 Wind Effects

An analysis of the wind environment was undertaken by Windtech Consultants and submitted with the project application for the redevelopment of the Casino. Windtech Consultants have prepared an addendum specifically addressing the impacts of the proposed modifications (see **Attachment F**).

The key findings of this assessment are provided below:

- *'Wind conditions on the light rail platform and bus stop may require amelioration by devices such as the inclusion of baffles screens. However, wind conditions can be verified and treated by the use of a wind tunnel study.*
- *The pedestrian wind conditions at other nearby locations are expected to be similar to those present in the design of October 2008. Based on previous wind tunnel testing, we expect that the wind condition in these areas to be acceptable as main pedestrian thoroughfares with the effect of the existing street planting.*
- *The proposed awning above the main entrance will enhance the wind condition nearby to the main entrance. The pedestrian wind conditions at other nearby locations are expected to be suitable as main pedestrian thoroughfares.*
- *Wind conditions at the retail lobby will be similar or improved compared to the October 2008 design.*
- *Wind conditions in the unenclosed areas associated with the central void will be improved with the automatic closure of the facade flags on the central part of the facade on windy days.*
- *It is expected that with the addition of a facade flag design wind conditions in the unenclosed areas will be suitable for long duration activities for a greater percentage of the year than in the October 2008 design.*
- *Wind conditions on the Level 03 roof are expected to be similar to that of the October 2008 design. However, wind tunnel testing of this area is recommended.'*

7.6 Safety / Public Areas / Pedestrians

Urbis prepared a Crime Prevention through Environmental Design (CPTED) report to assess the safety impacts of the redevelopment to the Casino. Urbis have prepared an addendum specifically addressing the impacts of the proposed modifications (see **Attachment G**).

The key findings of this assessment are summarised below:

- *The proposed changes will see an overall improvement in the safety and amenity of the porte cochere drop-off point and transport interchange by reducing potential pedestrian/vehicular conflict.*
- *The transparent screen will better integrate the porte cochere area with the bus interchange and light rail corridor by creating clear sightlines and promoting greater natural surveillance.*
- *It will also improve legibility of the area as a transport hub and improve pedestrian movement between the uses of the area.*
- *Good lighting for night use will be essential for maintaining view corridors between the porte cochere, bus interchange and light rail corridor.*

7.7 Vehicular Access, Car Parking and Traffic Impacts

An analysis of traffic impacts, car parking and vehicular access was undertaken by ARUP and submitted with the project application for the redevelopment of the Casino. ARUP have prepared a Traffic Report Addendum specifically addressing the impacts of the proposed modifications (see **Attachment H**).

The key finding of this assessment is provided below:

'The revised Pirrama Road layout is satisfactory from a transport perspective, both in terms of circulation into and out of the porte cochere, as well as through the bus/coach undercroft area. With the enhanced bus/coach undercroft area layout, the proposed design is forecast to perform operationally at an improved level to that assessed in Arup's 2008 traffic studies.'

7.8 Noise

An analysis of the acoustic impacts was undertaken by ARUP and Bassett Acoustics and submitted with the project application for the redevelopment of the Casino. Acoustic Logic Consultancy have prepared a statement specifically addressing the impacts of the proposed modifications (see **Attachment I**).

The key finding of this assessment is provided below:

'the proposed façade design would not increase noise emissions to the most impacted receivers provided the following recommendations regarding the roof terrace are adopted:

The underside of the roof canopy should be highly acoustically absorptive with a minimum NRC of 0.85 and the intended uses of the roof deck would need to be managed in compliance with the limits/controls stipulated in the Noise Management Plan.'

7.9 Reflectivity

An assessment of the potential for solar glare from the proposed glass façade was undertaken by Bassett Consulting Engineers and submitted with the project application for the redevelopment of the Casino. AECOM Australia have prepared a statement specifically addressing the impacts of the proposed modifications (see **Attachment J**).

The key finding of this assessment is provided below:

'Whilst minimal reflected solar glare may be experienced at different times to different locations the multi-facet nature of the façade design reduces the angular size of any reflected solar image such that any glare is discomfort glare not disability glare. Separating the reflected solar image into different locations on the façade reducing the angular size of the reflected image at any one point which significantly reduces the visual impact compared to the previously approved scheme.'

7.10 Ecological Sustainable Development

Cundall prepared an ESD Report which was submitted with the project application for the redevelopment of the Casino. Cundall have prepared an ESD statement specifically addressing the impacts of the proposed modifications (see **Attachment K**).

The key findings of this assessment are provided below:

- *'The revised scheme is proposing an alternative façade performance to that previously detailed in the approved scheme. However the process proposed to achieve BCA Section J compliance remains the same. It is proposed that the combined façade performance of glazing and operated internal blind system will be sufficient to achieve the required performance as previously determined. Additionally, the potential operable window area has increased above that proposed as part of the original (approved) scheme. This will increase the opportunity for natural ventilation, further reducing energy consumption.'*
- *'The ESD initiatives proposed for the previous (approved) and revised scheme remain the same.'*

7.11 Accessibility

An Accessibility Assessment was undertaken by Morris Goding Accessibility Consultants and submitted with the project application for the redevelopment of the Casino. Morris Goding have prepared an Accessibility Statement specifically addressing the impacts of the proposed modifications (see **Attachment L**).

The key finding of this assessment is provided below:

'The proposed design has utilised the DDA Premises Standards, AS 1428 series and BCA Part D3 to develop appropriate design documentation to provide adequate access provisions for people with disabilities'.

7.12 Building Code of Australia

A BCA Capability Statement was prepared by Philip Chun Consulting and submitted with the project application for the redevelopment of the Casino. Philip Chun Consulting have prepared a BCA Capability Statement specifically addressing the impacts of the proposed modifications (see **Attachment M**).

The key finding of this assessment is provided below:

'The design of the refurbished existing building is capable of being finalised before the Construction Certificate application so that it meets the requirements of the Deemed-to-Satisfy Provisions or Performance Requirements of the Building Code of Australia 2008.'

7.13 Fire Engineering

A Fire Engineering Report was prepared by ARUP and submitted with the project application for the redevelopment of the Casino. AECOM Australia have prepared a Fire Safety Engineering Statement specifically addressing the impacts of the proposed modifications (see **Attachment N**).

The key findings of this assessment is provided below:

'The revised design does not result in additional items of variation to the deemed-to-satisfy provisions of the BCA that require fire safety engineering assessment. The Alternative Solutions will be similar to that of the previous submission, with detailed requirements adjusted for the new design features.'

7.14 Matters raised by Department of Planning and Design Review Panel

Table 2 provides a response to the issues raised in the correspondence by the Department of Planning dated 17 November 2008 which related to the project application.

Table 2

Topic	Issue	Response
Number of Parking Spaces	<ul style="list-style-type: none"> ▪ <i>The submission from the RTA requires that car parking provision within the development is to be consistent with City of Sydney Council's controls.</i> ▪ <i>Parking spaces provided remain well in excess of the allocation of 1 space / 5 hotel bedrooms and 4 spaces / 100m² of function room area stipulated in the Sydney City Local Environmental Plan 2005.</i> ▪ <i>The Preferred Project Report should incorporate parking numbers reduced to be consistent with Council's controls, for the hotel.</i> 	The proposed modifications will not impact on the approved car parking provision.
Traffic	<ul style="list-style-type: none"> ▪ <i>Submissions from Government agencies and the public raise general concerns regarding the impact of increased traffic movements on local traffic flows and on community amenity and safety.</i> ▪ <i>The Preferred Project Report should address traffic issues raised in the submissions, with particular regard to matters raised by RTA, Sydney Buses and City of Sydney.</i> ▪ <i>Transport Impact assessment is to include traffic impact modelling during all peak periods including the Casino peak use periods, being 10pm to 1am Friday and Saturday nights.</i> 	The proposed modifications will not impact on the traffic generated by the approved development.
Outdoor Gaming Areas	<ul style="list-style-type: none"> ▪ <i>The proposed outdoor gaming and entertainment areas may produce high noise impacts, particularly on the Union Street frontage to the site.</i> ▪ <i>The Department requires additional acoustic analysis to indicate the impact of the two proposed outdoor entertainment areas on noise levels in the local neighbourhood. Specifically, noise levels in residences and the public domain on Union Street, Pyrmont Street, Pirrama Road and the waterfront developments around Jones Bay are to be assessed at peak use periods for the outdoor entertainment areas.</i> ▪ <i>Measures proposed to mitigate any potential impacts of these areas on neighbourhood amenity are to be included in the Preferred Project Report.</i> 	This issue was addressed in the PPR for the project application. The acoustic impacts associated with the proposed changes to the roof terrace are summarised in Section 7.8 of this letter.
Design Review Panel	<p><i>The Design Review Panel is currently reviewing the additional sketches submitted on 3 November 2008. The Panel's response will be forwarded separately when available. The design of the proposal has been an ongoing issue that was raised by the Department prior to exhibition and has been discussed in detail at the meetings with the Panel, with a view to improving the design and impacts on the public domain areas.</i></p>	A response to the comments made by the Design Review Panel is included at Table 3 below.

Topic	Issue	Response
Height	<i>The height of the proposed hotel has been identified as an issue in the Department's previous correspondence.</i>	The proposed modifications will not impact on the height of the approved development.
-	<i>In addition to addressing the issues raised above, the Preferred Project Report is to provide the following information:</i>	-
Overshadowing	<ul style="list-style-type: none"> ▪ <i>Shadow diagrams provided with the EA are at an insufficient scale to assess shadow impacts on nearby residences and the public domain. Shadow diagrams at a larger scale (minimum 1:200) should be provided.</i> ▪ <i>Elevational shadow diagrams of buildings in Union and Pyrmont Streets are also to be provided. These are to indicate the existing and resultant shadow heights on each elevation in mid winter.</i> 	This issue was addressed in the PPR for the project application. Further, the proposed modifications will not result in any additional overshadowing impacts than the approved development.
Wind Effects	<ul style="list-style-type: none"> ▪ <i>The Wind Effects Report recommends wind tunnel testing to verify its preliminary conclusions with regard to wind impacts of the proposal. This testing is to be carried out and the results provided with the Preferred Project Report.</i> ▪ <i>Submissions have raised questions regarding the origin of wind data as the basis for assessment of the wind effects of the development. Please advise whether data from Goat Island is appropriate for the assessment in lieu of data from Kingsford Smith Airport as quoted in the Wind Effects report.</i> 	This issue was addressed in the PPR for the project application. The wind effects of the proposed modified development are summarised in Section 7.5 of this letter.
Reflectivity	<ul style="list-style-type: none"> ▪ <i>The Reflectivity Report submitted with the Environmental Assessment indicates that the glazed finishes to the development may potentially create glare hazards for drivers in the vicinity and may impact on pedestrians and residents. The report recommends that low reflectivity glazing should be used but does not indicate whether this measure will reduce reflectivity to an acceptable level for safety and comfort.</i> ▪ <i>The Preferred Project Report is to provide an assessment of these additional potential impacts and is to verify the outcomes of any mitigating measures proposed.</i> 	This issue was addressed in the PPR for the project application. Section 7.9 of this letter summarises the reflectivity impacts of the proposed modifications to the façade.

Table 3 provides a response to the comments made by the Design Review Panel in the correspondence by the Department of Planning dated 21 November 2008.

Table 3

Topic	Issue	Response
<p>Building Facade</p>	<p><i>The revised building façade is considered to be a slight improvement on the EA proposal but is in need of more refinement and detailing.</i></p> <p><i>The PPR is to include sufficient information with regard to materials and finishes on the façade to ascertain the architectural character of the new elevation.</i></p> <p><i>The flanking facades on either side of the main pedestrian entry zone would appear to be finished mainly in glazing so that their appearance would be similar to the EA proposal, particularly in night time views. Solids and voids should be more legible on the elevation and glazing should be reduced.</i></p> <p><i>The flanking facades should be of more formal geometrical design and should be straight in plan, following the line of the property boundary. These facades should include more extensive use of sandstone or other solid material at and above street level as a contrast to the glazed entry façade area.</i></p>	<p>The façade has been further revised in response to these comments as outlined by Fitzpatrick + Partners below:</p> <p><i>‘The proposed design creates a new, clearly defined object building. This structure is to be visually independent from the existing building behind whilst reflecting the expressive curves of the approved design. This approach allows the new structure to be its own distinctive element with its own details and materials appropriate to current construction technology, in the spirit of the age. In plan, this new building is formed from a series of generous symmetrical curves, with a firm axial focus on the existing main glass cupola at the centre of the site. The Pirrama Road facade is then shaped to form a generous concave pocket of space at the centre of the site, defining the key entry point. The two wings on either side provide more efficient spaces for the key internal activities within.’</i></p> <p>With regard to the use of solid and glazed materials, Fitzpatrick + Partners have responded as follows:</p> <p><i>‘The main Casino building is dominated by a heavy masonry expression. The Pirrama Road insertion in reality becomes the entry statement for the building. Its horizontal extension including the side wings create active “showcases” which are the physical representations of the offerings of the facility – restaurants, retail, fine dining and gaming. As such, it is appropriate to contrast this element and function to the solidity and enclosure of the flanking existing forms.</i></p> <p><i>The new entry pavilion is designed such that it floats above the public domain. It is treated visually as sitting on two large “feet”, clad in sandstone to express the solidity, and visual support function of these objects. They house the vertical escape stairs, service circulation and the ground plane retail pods.</i></p> <p><i>The use of stone cladding to these elements, introduces a visual and tactile richness to the vertical ground plan elements. Secondary vertical structural columns are left as finely detailed concrete, reflecting their masonry and functional purpose in an “honest” way.</i></p> <p><i>As such, when you view the Casino building in its entirety, the dominance of masonry is prevalent, with the glazed elements reflecting the purposeful public spaces of theatre lobbies and entry.”</i></p>

Topic	Issue	Response
<p>Vehicular Drop Off Area</p>	<p><i>A single drop-off area at the southern end of the frontage is preferred, freeing up the northern area for public uses such as cafes, seating, performance space and the like.</i></p> <p><i>The drop-off drive should be straightened to align with the property boundary. This will offer better functionality and more drop off space and less encroachment onto the pedestrian area and café seating area. The porte cochere should also be realigned accordingly.</i></p> <p><i>The footpath crossing area is to be treated as a 'shared zone' with no grade separation from the footpath proper. The entire footpath area including the drop off should be paved in high quality paving and the vehicular area subtly marked in the paving pattern. Contrasting paving is to be provided to the footpath / driveway crossover zone.</i></p>	<p>The northern drop off area has been removed and the VIP arrival has been incorporated into a single porte cochere with one entry and one exit point. Given the continuous surface with managed vehicular access, the design will allow for possible future use for outdoor performance, public events and the like.</p> <p>The entire drop-off area and porte cochere have been straightened to align with the property boundary and will be treated as a single shared zone, with vehicle zones defined by paving contrast, rather than grade separation.</p>
<p>Plan Treatment</p>	<p><i>Locations of columns to support the upper level restaurant areas will be critical to the functionality of the ground plane. Columns are to be indicated on the ground level plan in a logical location to allow free movement of pedestrians and vehicles and to complement the architectural quality of the façade.</i></p>	<p>At ground level, pedestrians, buses, taxis and the light rail converge in a single open space. This allows a relaxed and integrated arrival sequence for all visitors regardless of the particular mode of transport, allowing free movement of pedestrians and vehicles.</p>

8 Summary and Conclusion

This letter has been prepared in association with an application by Brookfield Multiplex to amend the Project Approval for the enclosure of the existing stairs to Pirrama Road (MP 08_0098, dated 27 January 2009).

The proposed modifications are considered to be minor and can be determined in accordance with the provisions of Section 75W of the EP&A Act. The proposed changes have been assessed in accordance with the relevant provisions of the approved Concept Plan and it is considered that the amendments will enhance the approved development.

Based on the above, we request that the minister approve the proposed modifications pursuant to Section 75W of the EP&A Act.

Yours sincerely,



Ian Cady
Associate Director

List of Attachments:

- A. Landowner's Consent Letter
- B. Letter of Confirmation of GFA and Drawings prepared by Hard & Forester
- C. Architectural Drawings prepared by Fitzpatrick + Partners
- D. Landscape Plan and Statement prepared by Tract Consultants
- E. Photomontages of the Project prepared by Haycraft Duloy
- F. Wind Environment Statement prepared by Windtech Consultants
- G. Addendum to CPTED Assessment prepared by Urbis
- H. Traffic Report Addendum prepared by ARUP
- I. Acoustic Statement prepared by Acoustic Logic Consultancy
- J. Reflectivity Statement prepared by AECOM Australia
- K. ESD Statement prepared by Cundall
- L. Accessibility Statement prepared by Morris Goding Accessibility Consultants
- M. BCA Capability Statement prepared by Philip Chun Consulting
- N. Fire Safety Engineering Statement prepared by AECOM Australia