

IMAX Redevelopment

SSD 5397

Submission to NSW Department of Planning and Infrastructure
28 October 2013





City of Sydney

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Figure 1. Proposed IMAX building against CBD backdrop
Source: Proponent's SSD Application



Figure 2. Proposed IMAX building with Tumbalong Park and Darling Quarter foreground
Source: Proponent's SSD Application

1.0 Executive Summary

This submission responds to the development application (DA) for the redevelopment of the existing IMAX theatre site and surrounding public domain at Darling Harbour for a commercial office development containing a new Imax theatre. The DA follows an 'unsolicited proposal' based on a design by Hassell architects and submitted by Grocon with the authority of SHFA (landowner) in July 2012. The original design proposal raised significant concern and was subsequently amended which is the basis of the current submission.

The City is concerned by the escalating use of Premier and Cabinet's 'unsolicited proposal' gateway to enable and encourage private redevelopment proposals on public land which are contrary to strategic planning schemes and not subject to upfront public consultation as set out in the Planning System White Paper.

The proposed "ribbon" building is a strong and distinctive proposal, one which the designers say responds to the emerging taller and bulkier scale of the western fringe of the CBD through the recent Darling Quarter development, forthcoming Barangaroo redevelopment and approved exhibition, convention and entertainment facilities. In addition, the intention to create an iconic and easily recognisable building would be realised sharply through the character and dramatic shape of the building.

With essential ground plane qualifications, there is general support for the redesign of the proposed IMAX redevelopment. In particular:

- The commitments to improve the public domain surrounding the building in conjunction with the forthcoming Sydney International Convention, Exhibition, Entertainment Centre project;
- The proposal's intention to strengthen linkages between the revitalised major event facilities, Darling Quarter and Cockle Bay;
- The activated ground level footprint of the building is generally supported, including the undulating façade which provides for outdoor dining areas separated from general pedestrian movement;
- A further reduction in the size of the ground plane footprint is required to improve visual access of the new SICEEP facilities from East Darling Harbour and the staircase connecting to Druiitt Street;
- The sustainability measures incorporated into the design;

- Increasing the extent of the children's play area particularly for older children via climbing net structures, lookouts, climbing walls, elevated slides and skateboard or scooter riding.

This submission provides commentary and recommendations generally regarding public domain, transport and heritage issues.

The following are key recommendations:

Bulk and Scale

1. The reduction of views and visual access and legibility at the ground plane and below the western flyover from Cockle Bay to the Darling Harbour Live exhibition and entertainment facilities is excessive; and
2. A view loss analysis should be carried out for residences to the south of the site and the Department should assess view loss impact as per the *Tenacity* planning principles.

Public Domain

3. Opportunities to more directly connect the site with Bathurst Street and Harbour Street should be explored;
4. A large event space on the western side of the building must not diminish the primacy of the north-south pedestrian movement through the precinct;
5. Materials and finishes in the public domain should seamlessly blend with the City's streetscape code and materials palette and work in harmony with strategies for Darling Harbour and the Darling Harbour Live project; and
6. Landscaping canopy spread should be maintained or increased where possible rather than reduced.

Traffic, Transport, Walking and Cycling

7. An assessment of the adequacy of existing footpaths and intersections along the Bathurst Street and Druiitt Street routes to Town Hall station should be undertaken;
8. The north-eastern corner of the building at the ground level should be further setback from the Harbour edge to maintain pedestrian circulation space;
9. Traffic modelling should be undertaken at the intersection of Erskine Street with Shelly Street and Sussex Street and the cumulative impacts of the Barangaroo development; and
10. Bicycle parking should be increased, bicycle access through the loading dock should be protected from incursions and secondary access to bicycle spaces should be provided from the Darling Harbour shared paths.

Heritage

11. Heritage and Archaeological investigations should generally be more intensive;
12. The existing carousel, organ and *Jay Flowers* sculpture should be carefully relocated according to heritage conservation principles; and
13. An interpretation strategy should be prepared in conjunction with public domain planning.

The submission **Overview** is found in **Section 2** of this report.

The detailed submission **Recommendations** are found in **Sections 3, 4, 5 and 6**.

It is anticipated that the Proponents will be required to lodge a Response to Submissions Report or Preferred Project Report, at which point the City may provide recommended conditions of consent.

2.0 Background

2.1 Original Design

The Proponent's first design, used to request for Director-General's Requirements in July 2012, had a unique massing of two office wings at rotating geometry joined by a central core (Figure 3).

The indicative drawings identified the following original intent:

- 70,000sq.m of office, retail, function and entertainment uses, of which 49,000sq.m was earmarked for office floor space and 13,500sq.m for retail and entertainment floor space and a revised IMAX cinema;
- 80-100 car parking spaces located within the podium form;
- 14 storey form reaching approximately RL 78; and
- upgrading of the existing public domain within the immediate area adjoining the site.

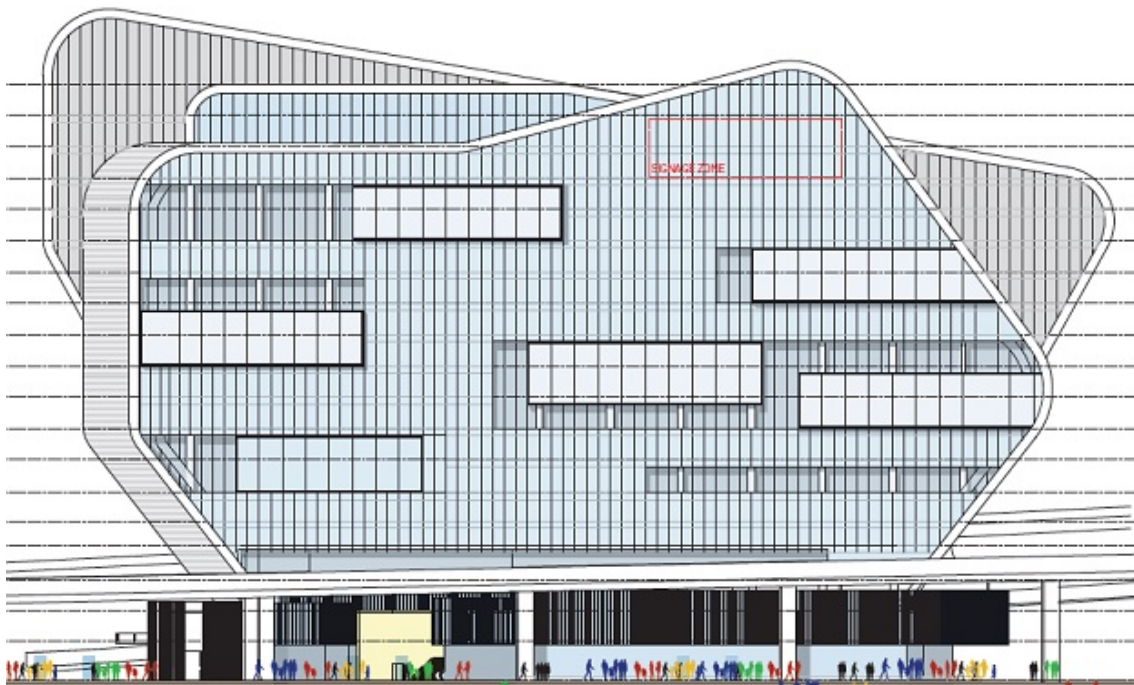


Figure 3. First design intent lodged with DGRs request
Source: Proponent's DGRs drawings

2.2 City's Response to Director-General's Requirements (DGRs)

The City's response to the draft DGRs for the original design raised issues with the bulk and scale of the proposal. Among the issues raised in the DGRs response was that the proposal was a number of floors too high and the footprint at the ground was too large and disruptive to pedestrian flows through the site. In relation to height, it was felt that the proposal would have resulted in significant loss of solar access to the Darling Quarter children's playground and Tumbalong Park from the western corner of the building.

2.3 Proposed Development

The proposed development was redesigned following the City's, the Department's and the community's feedback on the original design.

The revised proposal comprises:

- demolition of the existing IMAX building, tourist information office, amenities block and storage sheds;
- construction of a 20 storey mixed use building for office, retail and entertainment purposes, reaching RL 93;
- construction of a separate 2 storey building for public amenities and Sydney Harbour Foreshore Authority (SHFA) uses as an office, workshop and retail tenancies;
- a total gross floor area of 74,233sq.m, broken up into components as follows:
 - 62,427sq.m for office purposes;
 - 11,100sq.m for retail and entertainment purposes, including a new IMAX theatre;
 - 706sq.m for public amenities, SHFA workshop and storage.
- 86 car parking spaces and 332 bicycle parking spaces;
- upgrades to the surrounding public domain including relocation of the existing children's carousel and a new playground area; and
- signage zones and a display screen on the new 20 storey building.

Key differences between the original design and the revised design include:

- The building mass has been shifted to the east toward the city and the height undulates, falling to the west to represent a gradual reduction of bulk and scale from the CBD to the Darling Harbour valley floor;
- Asymmetric form has been introduced by twisting the building in plan and elevation on several different axes;
- There is a 30% increase in playground and public domain area compared to the original scheme; and
- At 1pm in midwinter there is no additional overshadowing of Tumbalong Park, the Darling Quarter children's playground and the Darling Quarter "village green", compared to the original scheme. This represents a reduction of overshadowing across 6% of the overall open space.

3.0 Bulk and Scale

Compared to the original design, the proposed developments building mass has moved to the north-eastern side of the site and been reshaped in plan and elevation as a cascading 'ribbon' façade filled in with office levels.

The City acknowledges that the built environment around Darling Harbour is currently in transition. This includes the increased scale of the Darling Harbour Live facilities, the proposed Haymarket District, the proposed ICC Hotel, the Four Points Hotel expansion and Barangaroo. Whilst there may not be agreement with the applicants view that Darling Harbour is going to be a natural extension of the Sydney CBD (because large areas of public realm will endure at the Darling Harbour valley floor), the way in which the proposal transitions from the western fringe of the CBD to the Harbour edge is considered more appropriate in the revised design. This transition has enabled increased solar access into Tumbalong Park and Darling Quarter where the previous design did not.

3.1 Views to and from Darling Harbour Live Facilities and “The Boulevard”

The Department is requested to review the impact of the proposed development on views to and from Cockle Bay, the approved Darling Harbour Live “Boulevard” and the approved Darling Harbour Live exhibition and entertainment facilities. A visitor walking north along the approved Boulevard and veering towards the CBD may have difficulty orienting themselves toward the Harbour edge. The geometry of the proposed path between The Boulevard and the IMAX building would result in pedestrians looking straight into the building.

Similarly a pedestrian moving south from Cockle Bay towards the Boulevard and Darling Harbour Live facilities will have views interrupted and way finding impacted upon by the western edge of the proposed building.

At the north-western corner of the proposal, the ground plane and the proposed aboveground projections appear to unnecessarily enclose the available view corridor to and from The Boulevard and the exhibition and entertainment facilities. It would be a shame for significant investment to be put towards redeveloping the existing exhibition and entertainment centres if the new centres and associated connections were not as prominent as possible to visitors from the Harbour edge.

It is recommended that the Proponent lodge photomontages of the proposed view from Cockle Bay to and from The Boulevard and the exhibition and entertainment facilities and the Department should assess whether there are any opportunities to improve

views, legibility and way-finding through to the facilities. For instance, the footprint of the retail tenancy at the north-western corner should be reduced to open up line of sight and the building overhang could commence at a higher level to open up greater view corridors.

Recommendation 1

The impact of the development on ground level view reduction from Cockle Bay to and from the Darling Harbour Live exhibition and entertainment facilities and The Boulevard should be reviewed.

3.2 Overhang of Harbour Street

The Department is requested to carefully consider the merits of the proposed overhang of Harbour Street. The overhang may cause significant loss of Darling Harbour, Pyrmont and north shore views from private residences to the south of the site.

The Sydney Development Control Plan 2012 would not support such an extensive building overhang. If Harbour Street were controlled by the City, the proposed overhang would not be supported.

The Department should inspect the residences affected by the proposal and review the proposal in light of the *Tenacity* planning principles for view sharing.

Recommendation 2

A view loss analysis should be carried out for private residences to the south of the site and the Department should assess view loss impact as per the *Tenacity* planning principles.

4.0 Public Domain

4.1 Bathurst Street Pedestrian Link

The ground level Harbour Street pedestrian route from Bathurst Street is considered a less than desirable route. It is acknowledged that the route could become more popular with the proposed public domain improvements in the immediate surrounds of the IMAX building. However, pedestrians still need to overcome the Day Street crossing, consciously by-passing the Bathurst Street bridge overpass, crossing Harbour Street and crossing the Western Distributor off ramp.

All opportunities to connect the site more directly to Bathurst Street via an additional pedestrian link off the Bathurst Street overbridge should be explored for pedestrian legibility and desire lines. The City is aware that there may be limited clearance height for a pedestrian bridge around the expressway along some of the existing overbridge. However, the full range of options should be explored and put forward for review by the Proponents.

Recommendation 3

All options to connect the site more directly to Bathurst Street should be documented.

4.2 Harbour Street Pedestrian Link

The Harbour Street pedestrian link crosses over the vehicle entry into the basement of the proposed IMAX building. To ensure that this is a clear pedestrian link, the public domain paving and levels should demonstrate pedestrian priority.

Recommendation 4

Further consideration should be given to how the Harbour Street pedestrian link will connect to the surrounding public domain and pedestrian connections to the south, particularly to address the 'back of house' between the site and Darling Quarter.

4.3 Public Domain - General

The Public Domain should be developed taking in to consideration the Darling Harbour Live project. The City recognises the commitments in the Environmental Impact

Statement to work in conjunction with the palette of materials and finishes selected for the Darling Harbour Live project.

The furniture palette should be consistent with any Darling Harbour site wide strategy and where possible draw on the palette contained within the City's Sydney Streets Design Code. Careful consideration should be given to the location and type of site furniture such as litter bins, seating and drinking fountains.

There is opportunity to increase canopy cover in the area to align with the City's Tree Planting Policies. The City's Urban Forestry Strategy lists targets for the Sydney Local Government Area and has found that the canopy coverage for Darling Harbour and the surrounding suburbs of Pyrmont, Haymarket and Barangaroo should be increased by 15% to address the suburb's environmental and social health needs.

Recommendation 5

Public domain materials and finished must be integrated with the Darling Harbour Live project and where possible draw from the City's palette of materials.

The number of trees to be removed / transplanted should be minimised. Opportunities to increase canopy cover should be explored.

4.4 Cockle Bay/Darling Harbour Public Domain Interface

It is crucial that new paving works integrate with the existing Darling Harbour precinct paving and any new paving installed as part of the Darling Harbour Live project.

The use of slotted drains is not supported. The City and others have had little success with slotted drains in the public domain due to blockages and maintenance implications.

Recommendation 6

It is recommended that slotted drains are removed from the proposal.

4.5 Western Edge – Outdoor Event Space

The western elevation of the building, at Level 1, includes a large outdoor cinema screen for public movies, performances, televised sporting events, business name signage, public announcements and event promotion by SHFA.

The event space, as nominated in the Landscape Report, is primarily within the pedestrian circulation zone to the immediate west of the building. A smaller viewing area is further west, between 30m and 60m from the screen and probably too far from the screen to be worthwhile.

A crowd gathered to watch the screen has the potential to disrupt major north-south pedestrian movements to and from the area if not sufficiently controlled. The Landscape Report indicates that access will be maintained along the building edge under the façade. However, the space appears very limited and may not be sufficient for an influx of thousands of people (from the approved exhibition and entertainment facilities or a major event around the Harbour) bound for Chinatown, the CBD, Cockle Bay Wharf, King Street Wharf, Barangaroo, etc.

The need for a large event space in this location is questioned for the following reasons:

- The location of the event space conflicts with pedestrian circulation
- The seating/viewing edge is over 30m from screen
- There are many large event spaces in the immediate vicinity

In the event that the event space is pursued, a Pedestrian Plan of Management should be prepared outlining crowd and pedestrian management necessities for a series of typical events that would be expected.

The Urban Design Report states that the viewing angle for the cinema screen will be controlled to not contravene Roads and Maritime Guidelines for animated signage visible from roadways. However, it appears that the angle shown within the drawings easily facilitates views, and driver distraction, for vehicles on the eastbound expressway into the city. A SEPP 64 Assessment and commentary on compliance with RMS Guidelines should be provided.



Figure 4. Crowds gathered near IMAX forecourt for dragon boat racing
Source: City of Sydney

Recommendation 7

Consideration needs to be given to removing or containing the event space.

If the event space is retained, a Pedestrian Plan of Management should be prepared and implemented during major events. The Plan of Management should be based on credible estimates of pedestrian counts and desire lines from the proposed development, the approved exhibition and entertainment centres and general background pedestrian traffic.

An assessment against the heads of consideration in SEPP 64 – Advertising and Signage and RMS Guidelines should be carried out to determine whether the proposed large screen will be a distraction hazard to vehicles.

4.6 Removal of Palm Trees

Figures 2 and 3 in the Landscape Report prepared by Aspect studios, indicate 54 existing palms are to be removed and only 20 palms are to be relocated to the upper level turf area. No information is provided on the remaining palms.

The palms currently provide a vertical element within the space and improve the visual aesthetic of the concrete overpasses (see Figure 5)



Figure 5. Palm grove offsetting verticality of Western Distributor expressway
Source: City of Sydney

No Arborist Report has been provided with the application and as such it is difficult to comment on the feasibility of transplanting such a large quantity of mature palms. An Arborist's Report including a plan of management for the transplantation should be undertaken by a qualified Arborist with a minimum AQF level 5. The report should include details of:

- Pre-transplant considerations;
- Site preparation;
- Excavation;
- Preparation of new planting position;
- Lifting and relocation methods;
- Planting specifications;
- Backfilling and completion;
- Maintenance Program.

In the event that the tree transplanting cannot occur, either due to site access or viability of the tree as confirmed through the Arborist Report, replacement trees of the same species should be planted in a suitable location on the site.

Although palms provide limited shade, the proposal indicates an overall reduction in canopy cover, which is not supported.

The Environmental Impact Statement, prepared by JBA, analyses the current pedestrian capacity situation and makes the following conclusion:

“Overall, the existing footpaths operate well with no queuing or delay at any time or location.” (p44)

This above to support the City’s view that the existing palms do not currently hinder pedestrian movement and this should not be considered as justification for the removal/relocation of all existing trees.

Recommendation 8

The removal and relocation of all palms is reconsidered and that the public domain plan is modified to reflect the retention of key stands of palms.

4.7 New Playground and Darling Quarter Public Domain Interface

Both the new playground and the relocation of the existing carousel are supported.

5.0 Transport, Parking, Cycling and Walking

5.1 Adequacy of Pedestrian Facilities

The existing pedestrian geometry and intersections along Bathurst Street and DrUITT Street may experience capacity issues catering for the pedestrian generation of workers from the proposed office floor space.

The Bathurst Street/Day Street leg to Town Hall Station is often already over capacity from workers to/from the Darling Quarter Towers. The existing footpath infrastructure along Day Street cannot cater for Darling Quarter office traffic, leading pedestrians to veer onto grass landscaping and tree roots. As at mid October 2013, remedial works are in progress to widen and align the footpaths and limit damage to landscaping (Figures 6 and 7).



Figure 6. Inadequate pedestrian infrastructure to/from Darling Quarter buildings
Source: City of Sydney

Figure 7. Remedial works to rectify pedestrian inadequacies
Source: City of Sydney



An assessment of the adequacy of existing footpaths and intersections along the Bathurst Street and Druiitt Street routes should be undertaken to determine pinch points, inadequate footpaths and inadequate circulation/storage around intersections taking into account forecasted pedestrian traffic from the proposal.

On 5 August 2013 the Planning Assessment Commission approved the expansion of the Four Seasons Hotel in Darling Harbour (233 additional hotel rooms and large exhibition/convention space) with the following pedestrian upgrade requirements:

- Upgrade Market Street and Sussex Street intersection in order to improve the intersection for pedestrians;
- Upgrade King Street and Sussex Street intersection in order to improve the intersection for pedestrians;
- Upgrade existing footpath and kerbing on the west side of Sussex Street with granite paving, street trees and furniture in accordance with Council's Sydney Streets Code.

Recommendation 9

An assessment of the adequacy of existing footpaths and intersections along the Bathurst Street and Druiitt Street routes should be undertaken to determine pinch points, inadequate footpaths and inadequate circulation/storage around intersections taking into account forecasted pedestrian traffic from the proposal.

5.2 Pedestrian Flows

Director-General's Requirement number 6.4 requires that detailed pedestrian modelling be undertaken to demonstrate that the proposal will achieve improvements in pedestrian flow through the precinct.

The traffic report outlines an assessment of pedestrian flows along Wheat Road, adjacent to the eastern alignment of the site. Whilst it is accepted that an adequate level of service may be maintained within the Wheat Road frontage, the areas to the north and west of the site is where major pedestrian flows currently occur, and will continue to occur.

The north-eastern corner of the proposed building will protrude approximately 12m further into the public domain than the current building (i.e. at the northern point of Tenancy 1). This will impact pedestrian flows through the area. The triangular shape of the tenancy seems unnecessary and could be set at a more oblique angle.

Recommendation 10

The setback of the north eastern corner of the proposed building (i.e. at the northern point of Tenancy 1) should be increased to ensure pedestrian flows through the area are not significantly impacted.

5.3 Parking Provision

A total of 86 car parking spaces are proposed within a car stacker facility. This is within the maximum set out under Sydney LEP 2012; therefore the quantum of car parking is not opposed, however there should be a restriction on these spaces being turned into a future public car park.

Further, the traffic report states that all 86 spaces are to be allocated to the commercial tenancy, with no allocation of parking for the retail space, function area or cinema. This

is not the intent of the City's parking controls and, if the spaces are to be used by commercial tenants only, then the allowance for other uses should not be transferred. The traffic report indicates that the commercial component of the development attracts a maximum parking requirement of 77 spaces which should be the upper limit for this land use.

Under Sydney Development Control Plan 2012, an area equivalent to 2 car parking spaces for 8 motorcycle spaces should be provided. These should not be provided along the pedestrian pathway, as indicated in the plans.

Recommendation 11

Limit the commercial car parking provision to 77 spaces or reallocate the 86 proposed spaces according to the various land uses of the building.

A minimum of 8 motorcycle parking spaces are to be provided.

5.4 Traffic Generation & Modelling

Director-General's Requirement number 6.1 requires traffic modelling and analysis to be undertaken in order to identify the daily and peak traffic movements likely to be generated by the proposed development, any impacts on nearby intersections, and the need for any upgrading or road improvement works.

The traffic report estimates that the development will generate approximately 120 vehicle movements during the AM and PM peak hours. However, no modelling was undertaken to assess potential impacts on nearby intersections, and thus the need for any upgrading or road improvement works.

The increase in vehicle movements during the PM peak hour may have a significant impact on the signalised intersections of Erskine Street with Shelly Street and Sussex Street, particularly in the context of the nearby Barangaroo development. The vast majority of vehicles exiting the site (>95%) will be required to pass through these two intersections.

Recommendation 12

Traffic modelling should be undertaken at the intersection of Erskine Street with Shelly Street and Sussex Street and the cumulative impacts of the Barangaroo development considered.

5.5 Loading

Under the provisions of Sydney Development Control Plan 2012, the proposed development is required to provide a minimum of 25 loading spaces. The proposed loading area consists of 3 loading bays capable of accommodating vehicles up to 8.8m medium rigid vehicles. In addition, 4 courier spaces are provided. A detailed management plan is required to ensure that loading activities can be effectively managed.

It is noted that one of the courier spaces is a shared loading / disabled space which is not supported. The dimensions of the disabled space do not comply with current guidelines.

The City has previously raised concern with the configuration of the loading and car parking and in particular, how all servicing vehicles will be reversing into the path of private vehicles waiting for the car stacker. Information should be provided as to how this will be managed to ensure the safety and suitable function for all users – particularly for pedestrians and cyclists (as detailed below, bike parking is currently only being accessed via the loading area).

Recommendation 13

A Loading Dock Management Plan should be prepared and submitted to Council prior to the Occupation Certificate for the site/use being granted. This Plan would identify the management arrangements for loading vehicles, general parking and cyclists and pedestrians. Once approved, the Plan will need to be provided/communicated to all tenants and external users of the area.

The disabled parking space is to be maintained and a separate shared area adjacent to the space provided, in line with AS 2890.6:2009.

5.6 Wheat Road Layout and Pick up / Drop off

It is unclear from the plans what is existing and what is proposed in terms of the arrangements on Wheat Road (road network, driveway accesses, loading etc.). This issue has been raised in comments on the Director-General Requirements.

The traffic report states that there will be a redesigned layout as part of the proposed development and that bus zone and set-down / pick-up arrangements will be formalised so that they operate more efficiently. Whilst in theory this is supported, detail of these works should be provided for comment in the Response to Submissions.

The proposed development is likely to increase demand for set-down / pick-up by both taxis and private vehicles. As such, the removal or reduction of spaces for this purpose would not typically be supported.

Recommendation 14

A detailed plan of the revised Wheat Road Layout should be submitted with the Response to Submissions.

It should be noted that sections of Wheat Road (particularly if realigned closer to Harbour Street) fall within the area of Central Sydney Transport and Traffic Committee and as such, consideration of any proposed new arrangements by this Committee may be required.

5.7 Bicycle Parking and Facilities

A total of 332 bicycle parking spaces are proposed - 276 for use by office tenants and 56 for use by visitors/customers. It is understood that some additional visitor bicycle parking will be incorporated into the design of the external public domain however no specific number is identified.

The applicant's approach to the assessment of bicycle parking numbers is generally supported as a greater number of spaces for employees than visitors are proposed (whereas NSW Bicycle Guidelines require more bicycle parking for visitors than for staff). However, the total number of spaces proposed remains well below the requirements outlined in Sydney Development Control Plan 2012 as shown in the table below.

Bicycle Parking			
Proposed Use	GFA	Employees	Customers / Visitors
Office	62,427m ²	416	156
Retail	4,232m ²	17	43
Gym*	1,973m ²	13	5
Cinema**	2,734m ²	-	68

Function**	2,161m ²	-	54
Visitor Centre*	706m ²	5	2
Total	74,223	446	328

* Based on the requirement for a business premises

** Based on the requirement for an entertainment facility

A condition should be imposed to increase the number of employee cycle parking spaces to a minimum of 446 in line with the City's controls. If this number cannot be achieved in the short term, the applicant should provide a strategy outlining how future expansion could occur to meet this target.

For example, the bicycle parking requirements for visitors outlined in the table are considered excessive given the likelihood that visitors will be coming to the area for more than one reason (i.e. they're likely to visit a series of uses in one trip). The number of visitor parking spaces can also be easily increased at a later date, if demand requires, given the flexibility of space in the surrounding public domain.

The location of the visitor and employee bicycle parking in two separate areas is supported. Both bicycle parking areas are accessed via the loading area only (i.e. when entering with your bicycle) which limits accessibility – in particular for visitors who are unlikely to be familiar with the parking/loading arrangements. The visitor parking area is unlikely to be well utilised unless extremely well signposted.

A narrow (1.6m) pedestrian path is provided along the northern loading dock to both parking areas – it is envisaged that cyclists would be required to dismount at the entry and follow this path which provides inadequate room for passing. Furthermore the width appears inconsistent along its length with a major pinch point at the hydrant booster (at the entry) and a number of sharp turns and obstacles (e.g. motorcycle parking on the path).

It is expected that a significant number of cyclists would go onto the roadway (which is one way northbound) to head into the loading area, creating significant risk of conflict with exiting/reversing vehicles. These concerns are greater for visitor who will be unfamiliar with the workings of the loading space.

Harbour Street is a busy road which is unlikely to be used by the vast majority of cyclists travelling to the site (and no future bicycle routes are planned for Harbour Street). As the majority of cyclists will approach the site from the shared pathways along Cockle Bay Wharf and through Darling Quarter, it makes sense to have direct access to bicycle parking from this area.

A total of 26 showers (12 female, 14 male) and approximately 145 lockers are proposed. Sydney Development Control Plan 2012 specifies 1 locker per bicycle parking space and 1 shower per 10 bicycle spaces be provided. Whilst the number of showers proposed is considered adequate, the number of available lockers will be quickly dissipated based on the proposed cycling numbers.

Recommendations 15

The number of bicycle parking spaces should be increased to a minimum of 446 for employees and 100 for visitors. The 100 visitor parking spaces should be a combination of secure, enclosed spaces (as currently proposed at ground floor level) and short stay, bicycle racks within the public domain.

A minimum of one bicycle locker per employee bicycle parking space should be provided.

A secondary access to both bicycle parking areas should be provided from the public domain. For employees, a second entrance to the bicycle parking area should be provided via the ground floor passageway between Tenancy 4 and Tenancy 5. For visitors, a second entrance to the bicycle parking area should be provided via the passageway between the southern side of the IMAX cinema and the SHFA buildings. Both passageways should be a minimum of 2.5m wide to allow for passing between cyclists.

Clear signage and wayfinding should identify access points to visitor bicycle parking areas from the public domain.

A minimum path width of 1.6m is to be maintained within the loading area. In particular, the pinch point on the eastern corner of the hydrant booster (at the entrance to the loading zone) should be rectified.

5.8 Travel Planning

Director-General's Requirement number 6.5 requires measures to be detailed to promote sustainable means of transport including public transport usage, pedestrian and bicycle linkages, work place travel plans, bicycle parking and facilities.

The Proponents are encouraged to work with other major businesses / property owners / developers to develop a viable Green Travel Plan. Although this can be conditioned as part of the DA process, it is unlikely to gain any significant momentum before key tenants of the building are identified.

A transport access guide should also be prepared for staff of the new building.

Recommendation 16

A Green Travel Plan and transport access guide should be prepared prior to the occupation of the building.

6.0 Heritage

6.1 Visual Impact and Heritage Impact

The Visual Impact Assessment methodology which assesses the visual impact as low, medium, high and catastrophic does not take into account levels of heritage significance.

The Heritage Significance and Impact Assessment is superficial and does not consider the impacts of the proposal on heritage assets and special character areas in the wider Darling Harbour/CBD/Pymont catchment. For instance, the York Street Special Character Area which encompasses the western warehouse precinct of the city provides evidence of early warehousing which developed to serve the Darling Harbour wharves. The area is typified by its nineteenth and twentieth century, 5-8 storey masonry buildings of a consistent scale, form and character. The architectural emphasis of the buildings located at street corners are a distinctive characteristic. The network of lanes, internal courtyards, uniform block pattern with narrow frontages and west-east visual links all present the various layers of the area's past and present commercial/retail character.

Recommendation 17

A complete Heritage Impact Statement should be prepared for the proposal. This should consider a larger catchment of heritage assets, including those in the western CBD, Pymont peninsula, and Darling Harbour.

The Heritage Impact Statement should discuss resultant loss of heritage character and setting for heritage items and special character areas within the City of Sydney as a result of the visual impacts of the proposal.

Section drawings should be provided to demonstrate the impact of the proposal on Sewage Pumping Station No. 12 and other heritage assets.

The Heritage Impact Statement should assess the impacts on important views from Sydney Harbour in respect of the Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005, specifically Section 25 Foreshore and Waterways Scenic Quality that requires certain matters to be taken into consideration in relation to the maintenance, protection and enhancement of the scenic quality of foreshores and waterways.

The Heritage Impact Statement should assess how the bulk and scale of the proposal maintains visual connectivity between the western precinct of the CBD and Darling

Harbour, the Pyrmont Peninsula, and Pyrmont Bridge.

The Heritage Impact Statement should assess the geographic connectivity between heritage items in the harbour and between the CBD and Pyrmont Peninsula.

The Heritage Impact Statement should demonstrate how the proposal interprets the natural and cultural heritage of the area

6.2 Relocation of the Carousel and Organ

The Carousel and Organ is listed on the State Heritage Register and the Sydney Harbour Foreshore Authority s.170 Heritage and Conservation Register. The proposed relocation of the Carousel and Organ is acceptable, however works must be undertaken in accordance with the Conservation Management Plan for this portable heritage item.

Recommendation 18

Any proposed relocation of the Carousel and Organ should be preceded by a thorough planning exercise developed in accordance with the policies and procedures outlined in the Conservation Management Plan for these items (SHFA 2012).

In accordance with Policy 16 of the CMP, the current setting of the Carousel and Organ is compromised by the 1992 Carousel enclosure. Consideration should be given to a revised structure which evokes a sense of a carnival or fairground. The scale of the current enclosure dwarfs the Carousel. Any revised structure should be more modest in scale, have a higher level of transparency and better interpret a fairground setting, while establishing an appropriate safety zone for the Carousel.

The relocation of the Carousel must ensure that the Carousel and Organ be retained as a group, appropriate views and vistas are maintained to and from the Carousel in current and future settings, allowing for the Carousel to be viewed in the round with a clear and unobstructed curtilage (Policies 17, 18).

The Construction Management Plan should be amended to include the relocation of the Carousel and Organ.

An Archival Record of the Carousel and Organ must be undertaken prior to relocation. Full records of the relocation must be carried out in accordance with the CMP (2012, Policy 8).

6.3 Relocation of Robert Parr sculpture *Jay Flowers*

Jay Flowers was commissioned by the Darling Harbour Authority in 1988, and was one of several works of public art for Darling Harbour selected by a special advisory committee under the chairmanship of Neville Wran. The sculpture was designed by Robert Parr, a teacher of sculpture at the Canberra School of Art, and executed in cut and welded steel by K and G Fabrications of Unanderra. The five outside blooms mounted on stems made from gently out-curving Rolled Steel Joists represent a bunch of Australian flannel flowers. At the time of their installation the Darling Harbour Authority commented

“They are meant to create a meeting place.... This particular piece is designed to stand at one of the pedestrian gateways to Darling Harbour.”

(Sydney Morning Herald, 12 April 1988).

Recommendation 19

Any proposed relocation of *Jay Flowers* should be preceded by a thorough planning exercise which carefully considers the new position of the piece.

The current setting of *Jay Flowers* has been compromised by its increasing isolation. The new setting must give consideration to the artistic intention of the piece, in that it was meant to create a meeting place, and to stand at one of the pedestrian gateways to Darling Harbour.

The Construction Management Plan should be amended to include the relocation of *Jay Flowers*.

6.4 Sewage Pumping Station No. 12

Sewage Pumping Station No. 12 was one of the original group of 20 low level sewage pumping stations constructed at the end of the nineteenth century to serve Sydney. The setting of the pumping station has been compromised, and its context has been reduced to a ‘landscaped island’ between the existing IMAX theatre complex and Harbour Street.

Recommendation 20

An assessment of the likely impacts of the proposal on Sewage Pumping Station No. 12 and proposed conservation and mitigation measures must be clarified prior to works. This should include a section drawing showing the Sewage Pumping Station in relation to the proposed development, and an assessment of the proposal on the setting of the Pumping Station. The assessment must consider the impacts of the proposed works in accordance with Sydney Water Environment Impact Assessment guidelines. The assessment should consider physical impacts to the fabric of items directly affected by the works, as well as impacts on the curtilage and setting of items, and views to and from items.

Vibrations from the proposed works may have an impact upon the fabric of Sydney Water's Sewage Pumping Station No. 12. A dilapidation survey should be undertaken prior to works.

Consultation with Sydney Water should be undertaken prior to works.

Archival and photographic recording of Sewage Pumping Station No. 12 should be undertaken in accordance with Heritage Council guidelines prior to works. Copies of the archival record must be lodged with Sydney Water Archives and the NSW Heritage Office.

Interpretation of the importance of the Sydney Water Pumping Station should be incorporated into the overall interpretation strategy (refer below).

6.5 Interpretation

Darling Harbour's dynamic history provides many themes which could enrich the proposed context of the Ribbon. The most appropriate themes to be interpreted need to be established, selected from the diverse range that Darling Harbour offers, from pre settlement times relating to the natural environment and the Cadigal people through to the present day.

Recommendation 21

An interpretation strategy should be prepared for the site. This must include interpretation of both Aboriginal and historic heritage. The interpretation strategy must include the provision for interpretation of any archaeological resources uncovered during the works. The archaeologists should be consulted in the development of

themes and interpretative concepts. The interpretation strategy should include details of the proposed location for interpretation and display of archaeological findings, historical information about the development on the site and information about the natural history of this section of the harbour foreshore and early modifications made to the shoreline.

As part of the interpretation process consultation with stakeholders including the Sydney Harbour Foreshore Authority, Sydney Water, City of Sydney Council, the Metropolitan Local Aboriginal Land Council and the NSW Heritage Council should be undertaken.

Interpretation of the importance of the Sydney Water Pumping Station should be incorporated into the design.

Site allocation must be made to include space for interpretation.

The proponent should incorporate the interpretation outcomes into the finished buildings and landscape, information that explains and illustrates the history of the place, its associations and its archaeological profile.

6.6 Integrating Landscaping with Integration Strategy

The proposed landscape design involves the substantial redesign of the current environment around IMAX theatre and should be carried out alongside interpretation planning.

Recommendation 22

Landscape Planning should be undertaken in close collaboration with Interpretation Planning (see below). This needs to be developed for the integration works to guide and explain the approach to heritage significance, use of materials, and public art. The interpretation strategy should be coordinated with the City of Sydney, Eora Journey and Cultural Ribbon projects. Documentation on these projects can be provided.

6.7 Archaeology

Recent excavations on adjacent properties have uncovered extensive archaeological resources spanning the development of Darling Harbour from a natural landscape to a tourism magnet. A full archaeological assessment should be prepared for the site prior to works, and an archaeological management plan developed to best manage archaeological issues on site.

Recommendation 23

An archaeological assessment of the likely impacts of the proposal on both potential Aboriginal and historic archaeological remains, including mitigation and conservation measures and research design should be prepared for the site prior to works. This should be prepared in accordance with best practice conservation approaches and guidelines including the Australia ICOMOS *Burra Charter*, and Heritage Council assessment and significance guidelines.

An archaeological management plan should be developed to best manage archaeological issues on site. Testing of areas to be impacted by the development should be carried out to establish the nature of the archaeological resource.

The Construction Management Plan should be amended to allow contingency for archaeological excavations.

The Master Programme should be updated to allow for archaeological excavation contingencies.