

Monday, 08 April 2024

Annie Leung  
Team Leader, Key Sites Assessments  
Development Assessment and Infrastructure

via online submission through the NSW Government Planning Portal

**RE: Development Application – SSD-49620481  
Pymont Metro Over Station Development – Residential Tower**

We refer to the above matter, which has been on application from 12<sup>th</sup> March 2024 to 8<sup>th</sup> April 2024 for public comment and submission (“**the Proposal**”).

We seek to make our submission and put forward our concerns in relation to the Proposal.

**Background**

By way of background we take this opportunity to provide the City of Sydney (**the Council**) further information on vacation ownership club, Accor Vacation Club (**AVC or the Club**) (and related body corporates), APVC Ltd, the responsible entity for AVC, and how we operate in the South Pacific, and specifically at our Club property the Sebel Darling Harbour the Pinnacle located at 104 Pymont Street, Pymont, Sydney NSW 2009 (**the Sebel Darling Harbour**).

AVC is a vacation ownership (or timeshare club) that is a registered managed investment scheme and is operated in accordance with the requirements of the Corporations Act 2001 and currently contains 24 properties in its network across Australia, New Zealand and Indonesia, including the Sebel Darling Harbour. Members in the Club use points as currency to secure room reservations at any one of the 24 properties that form part of the Club currently and receive an annual allocation of points that they can use for the life of the Club, which currently has 56 years remaining ongoing through until 2080.

AVC owns the Sebel Darling Harbour for use by its Club members for the life of the Club. The Hotel has proved an immensely popular tourist destination for club members and as a result, this Hotel enjoys regular sustained occupancy.

**Effect of the Proposal on the Club’s interests**

We respectfully submit to the Council that the Proposal may affect the Club’s interests negatively and note the following concerns the Club has about the Proposal:

- a) The building height at 31 stories appears excessive for the site and surrounding areas of Darling Harbour / Pymont area. The particular concern with regard to height is the possible shading on the Sebel Darling Harbour, which would have a serious detrimental effect on the Club members holiday experience at this location.
- b) The lack of car parking for the Proposal is a concern. The traffic and lack of available carparking in the Darling Harbour / Pymont area is already at a significant level and for the Proposal to only plan for 55 car spaces and up to 160 apartments we question the imbalance and planning.
- c) Have the setbacks for the Proposal been given enough consideration given the scale and size of the proposed building to be constructed?

## Conclusion

On behalf of AVC, we lodge a submission to the Proposal and our concerns with the detail as provided to date.

AVC would like to advise that we are open to consultation meetings with regard to this Proposal and its impacts on the surrounding buildings, specifically the Sebel Darling Harbour.

We appreciate your time and consideration in this matter and look forward to acknowledgement of the concerns raised and details of how these matters are to be addressed.

Should you have any queries, please contact us on the details set out below.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Carl Nimb', written over a faint circular stamp or watermark.

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On behalf of

**Craig Wood**  
**CEO Accor Vacation Club**