



Dunnet Properties Pty Ltd
Developers, Investors
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4 September 2025

Confidential

Director – Key Sites Assessments
NSW, Department of Planning, Housing and Infrastructure
12 Darcy Street,
Parramatta NSW 2150

Attention: Abigail Bautista (Planning Officer, Department of Planning, Housing and Infrastructure)

Dear Abigail,

**RE: SD-77820496 – Submission
Sydney Olympic Park Metro Station Over and Adjacent Station Development – Concept
Amendment**

Dunnet Group are the owners of 8 Figtree Drive, Sydney Olympic Park (Site 50), which is located directly to the south-west of the proposed Amending Concept State Significant Development Application (SSDA) for the Sydney Olympic Park Metro Station – Over and Adjacent Station Development. Dunnet Group would like to thank the NSW Department of Planning, Housing and Infrastructure (DPHI) for inviting submissions to this SSDA and we now provide the submission of objection to the proposed SSD-77820496.

Dunnet Group's objection is on the basis of two key matters including:

- **The increase in the maximum building height from RL 122.00 (21 storeys) to RL 151.00 (34 storeys).** The additional building height proposed for Building 1 will detrimentally impact the ability of the future redevelopment of our site to achieve sufficient levels of solar access, thereby impacting the development potential that would otherwise be possible under the Sydney Olympic Park Master Plan 2050 (Draft Master Plan 2050).
- **The land use change to Building 1 from a commercial building to a mixed-use residential building.** This will impact the longstanding vision to develop a viable and self sustaining town centre, with this key site above the Metro Station being fundamental to providing commercial uses that allow for the realization of this vision.

This submission is supported by Dunnet Group's submission in relation to the original Sydney Olympic Park Metro Station Over and Adjacent Station Development (SSD-35283699) (**Attachment A**) and Shadow Diagrams prepared by Curzon + Partners in relation to the Reference Design for Site 50 (**Attachment B**).

Dunnet Group's landholding

Dunnet Group's site at 8 Figtree Drive, Sydney Olympic Park is also known as Site 50 pursuant to the current Sydney Olympic Park Master Plan 2030 (Interim Metro Review) (Master Plan 2030). The location of Site 50 in relation to the Sydney Olympic Park Metro site is shown in **Figure 1**.

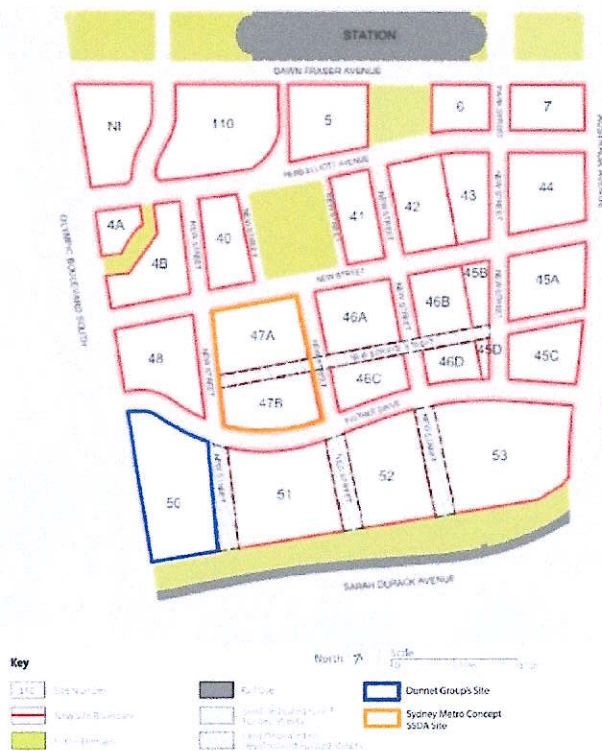


Figure 1: Site 50 and its location in relation to the Sydney Metro site at Site 47

Overshadowing impacts of the proposed Amending Concept SSDA

The proposed Amending Concept SSDA involves an increase in building height from 21 storeys to 34 storeys. This proposed increased building height will result in the following:

- Additional overshadowing of Site 50 on the winter solstice from 9am through to 1pm, which adds to the significant overshadowing of the site approved as part of the original Concept SSDA (SSD-35283699) when considered cumulatively with future development on Site 48, with these impacts detailed in Dunnet Group's submission to this previous SSDA (**Attachment A**).
- The proposed additional height will cumulatively result in a considerable increase in overshadowing as illustrated in the Shadow Diagrams prepared by Curzon + Partners in relation to the reference design for the site (**Attachment B**). The additional shadow caused by the proposed Amending Concept SSDA is highlighted in orange in **Figure 2**.
- The cumulative shadow impacts caused by the proposed Amending Concept SSDA and the future development on Site 48 will detrimentally impact the development potential of Site 50 in terms of maintaining acceptable levels of solar access (as required by controls in the Apartment Design Guide) to the podium and towers.
- The development potential of Site 50 will be adversely impacted as the site is envisaged to be mixed use with the tower elements comprising a residential use.
- The apartments on the eastern and northern elevation of a future development on Site 50 are reliant on the morning sunlight to achieve at least 2 hours of solar access on the winter solstice. This is further eroded as a consequence of this proposal.



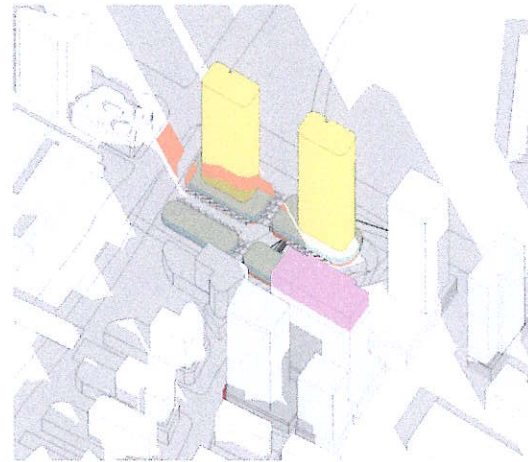
Additional overshadowing (shown in orange) caused to the reference design on Site 50 at 9am on the winter solstice



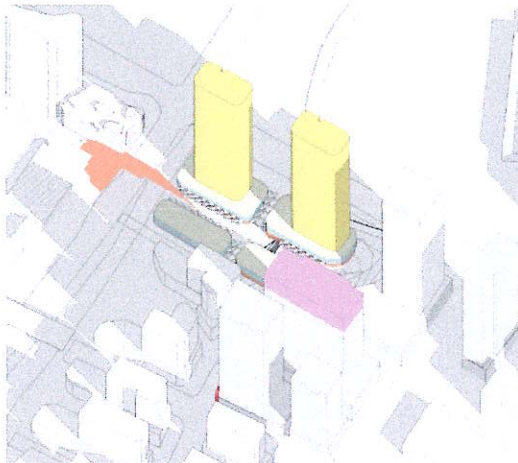
Additional overshadowing (shown in orange) caused to the reference design on Site 50 at 10am on the winter solstice



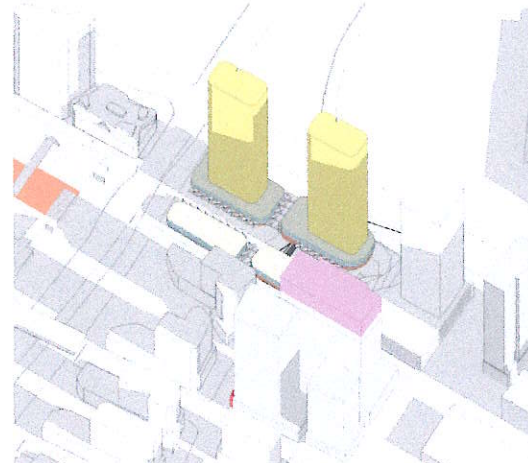
Additional overshadowing (shown in orange) caused to the reference design on Site 50 at 11am on the winter solstice



Additional overshadowing (shown in orange) caused to the reference design on Site 50 at 12pm on the winter solstice



Additional overshadowing (shown in orange) caused to the reference design on Site 50 at 1pm on the winter solstice



Additional overshadowing (shown in orange) caused to the reference design on Site 50 at 2pm on the winter solstice

Figure 2: Shadow diagrams illustrating the additional overshadowing caused by the proposed Amending Concept SSDA, which adversely impacts Site 50

Recommendation 1: On the basis of the above points, Dunnet Group recommends that further work is undertaken in relation to the proposed Amending Concept SSDA including a reduction in building height and refinements to the envelope to remove any additional overshadowing impacts on Site 50 and allow for reduced overshadowing when compared to the approved Concept SSDA (SSD-35283699).

Impact on viability of Olympic Park's Town Centre due to proposed change of use

Dunnet Group objects to the proposed change of use of Building 1 from commercial to a mixed use residential use for the following important reasons:

- This will undermine and impact the viability of the longstanding vision for Sydney Olympic Park to include a town centre within the Central Precinct (or proposed Urban Centre under the Draft Master Plan 2050) by converting the tower above the Metro Station to residential uses.
- The retention of a commercial / employment core is fundamental to the function of a town centre, and it should not be compromised especially on this key site above the Metro Station which has greater potential to attract non-residential tenants, and which will benefit nearby developments by attracting agglomerating non-residential uses that will be integral to develop a strong town centre.
- The conversion of this commercial space is shortsighted and not in the long term interests of the vision for this precinct as envisaged in the Master Plan 2030 or the broader principles to encourage employment uses in the Urban Centre neighbourhood as proposed in the Draft Master Plan 2050, particularly on this government owned site that is above the Metro Station which is the ideal location for an office building, in a location that is very poor for office building development viability.
- The proposed OSD is a three tower proposal which allows for the development of Building 1 as a dedicated 'destination' office building at some stage in the future. Obviously there is no market for offices in Sydney Olympic Park at the moment, but this is the Draft Master Plan 2050 vision, and it is possible that market dynamics will change between 2025 and 2050 to support the viable development of an office building.
- The Master Plan 2030 *'seeks to create a balanced land use mix that generates a viable, self sustaining Town Centre while enhancing existing event uses and requirements'* and in doing so specifically earmarks the building to which this Amending Concept SSDA relates to for commercial uses.
- The Draft Master Plan 2050 proposes a requirement to provide a minimum 50% non-residential GFA across 'Site 11UC' which is effectively Sites 47A and 47B as shown in **Figure 1**, which is the subject of the Amending Concept SSDA. The proposed Amending Concept SSDA is inconsistent with this control as it reduces the non-residential floor space by 26,422m² and will result in the provision of only 8,505m² non-residential GFA out of the total 64,530m² GFA, equating to only 13% non-residential uses.
- The provision of only 13% non-residential uses on the site subject to the Amending Concept SSDA is contrary to the 'Commercial' classification of this part of the site in the currently applicable Master Plan 2030 (as shown in **Figure 3**) and the 'Mixed Use' classification of this site in the Draft Master Plan 2050. With Buildings 2 and 3 being residential, the achievement of a mixed use scheme across the Metro OSD site requires the maintenance of Building 1 as wholly commercial.

Importantly, it is noted that if the proposed reduction in minimum non-residential FSR is applied to this site, this is direct acknowledgement by DPHI that substantive commercial floor space is not being pursued in Sydney Olympic Park and therefore the Draft Master Plan 2050 should be amended to minimise minimum non-residential commercial floor space for the precinct, including for Site 50 which has been proposed for 25% of non-residential office floor space despite Site 50 being mapped as 'residential'. To this end, commercial floor

space is most viable on the OSD sites, and if this amending SSDA is approved, then it signals that commercial floor space should be drastically reduced across the precinct, including for Site 50.

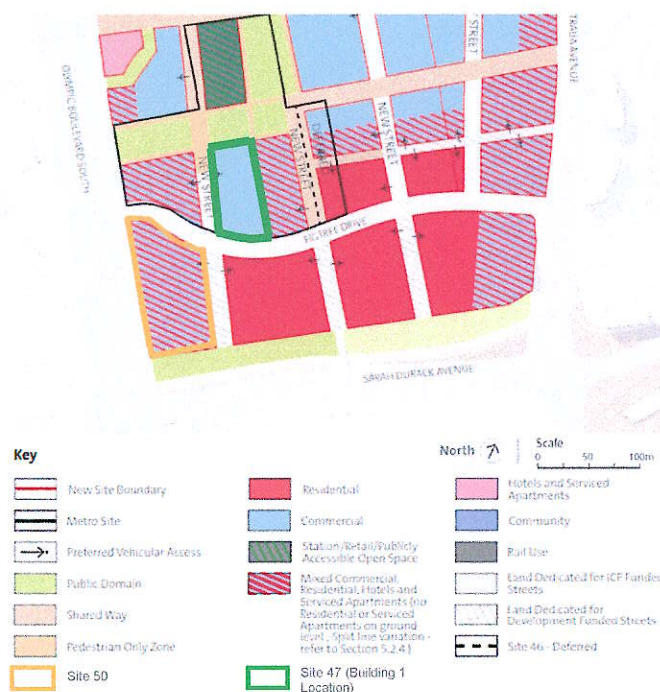


Figure 3: Central Precinct Land Uses Plan as set out in the Master Plan 2030

Recommendation 2: On the basis of the above points, Dunnet Group recommends that the proposed land use for Building 1 is maintained as commercial in line with the existing approval under the approved Concept SSDA (SSD-35283699).

Summary and conclusion

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

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

Sincerely,

**BOB DUNNET
OWNER
DUNNET GROUP**

**Attachment A – Dunnet Group’s submission in relation to the
Sydney Olympic Park Metro Station Over and Adjacent Station
Development (SSD-35283699)**



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15 December 2022

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

Attention: Paula Bizimis – Paula.Bizimis@planning.nsw.gov.au

SSD-35283699 – Submission

Sydney Olympic Park Metro Station Over and Adjacent Station Development

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

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

Dunnet Group's landholding

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

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

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

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

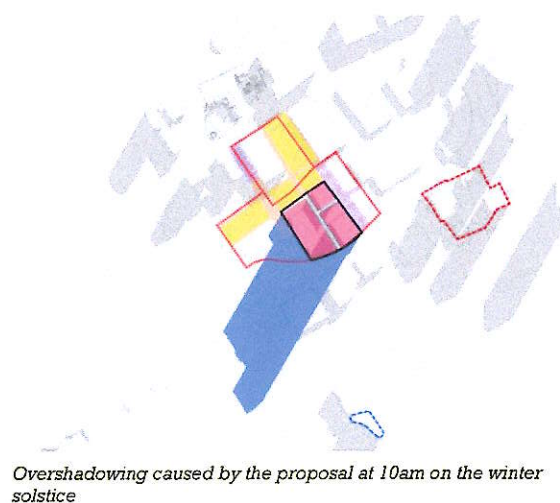
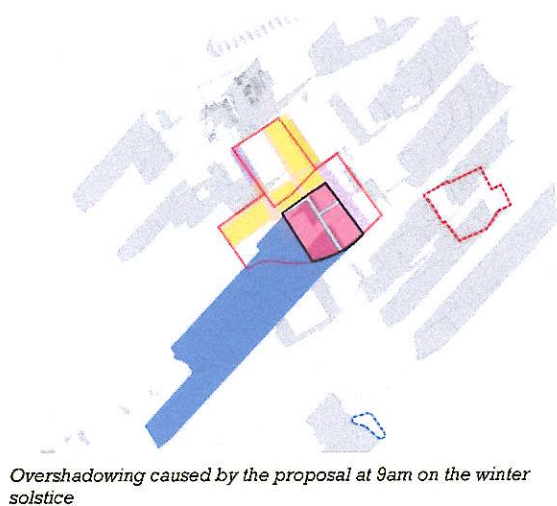
However, the proposed SSDA involves three buildings, including a 21, 27 and 45 storey building. These will have major overshadowing impacts on Site 50 which will detrimentally impact the viability of a mixed use development in line with the Sydney Olympic Park Masterplan 2030 (Interim Metro Review) vision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

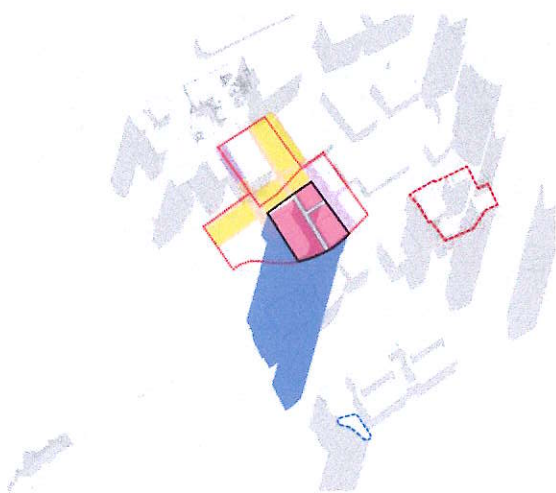


Figure 1: Site 50 and its location in relation to the Sydney Metro site at Site 47

Overshadowing impacts of the proposed SSDA

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

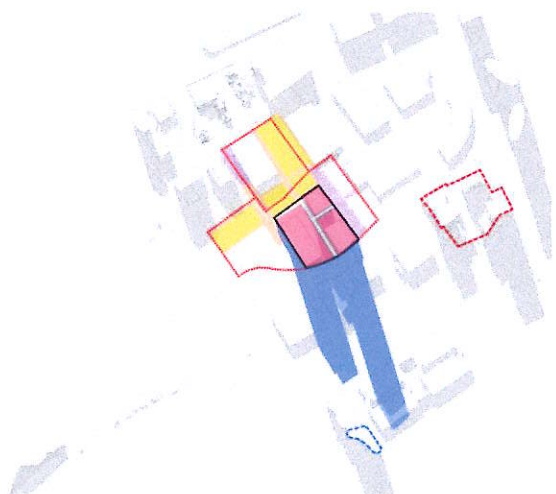




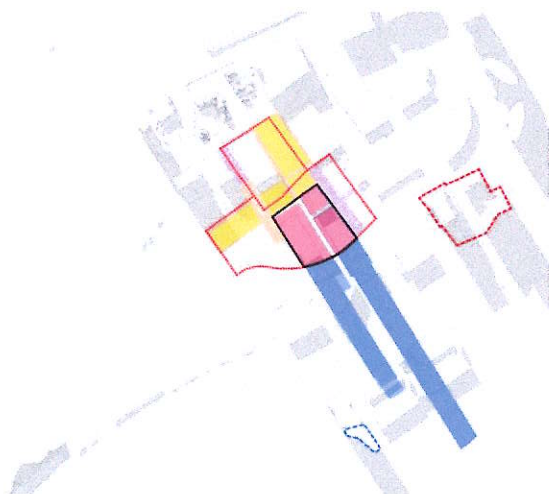
Overshadowing caused by the proposal at 11am on the winter solstice



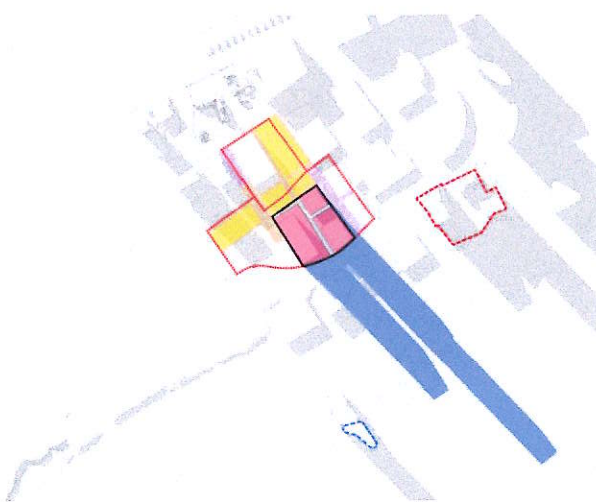
Overshadowing caused by the proposal at 12pm on the winter solstice



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



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



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

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

Figure 2: Excerpts from overshadowing diagrams

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

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

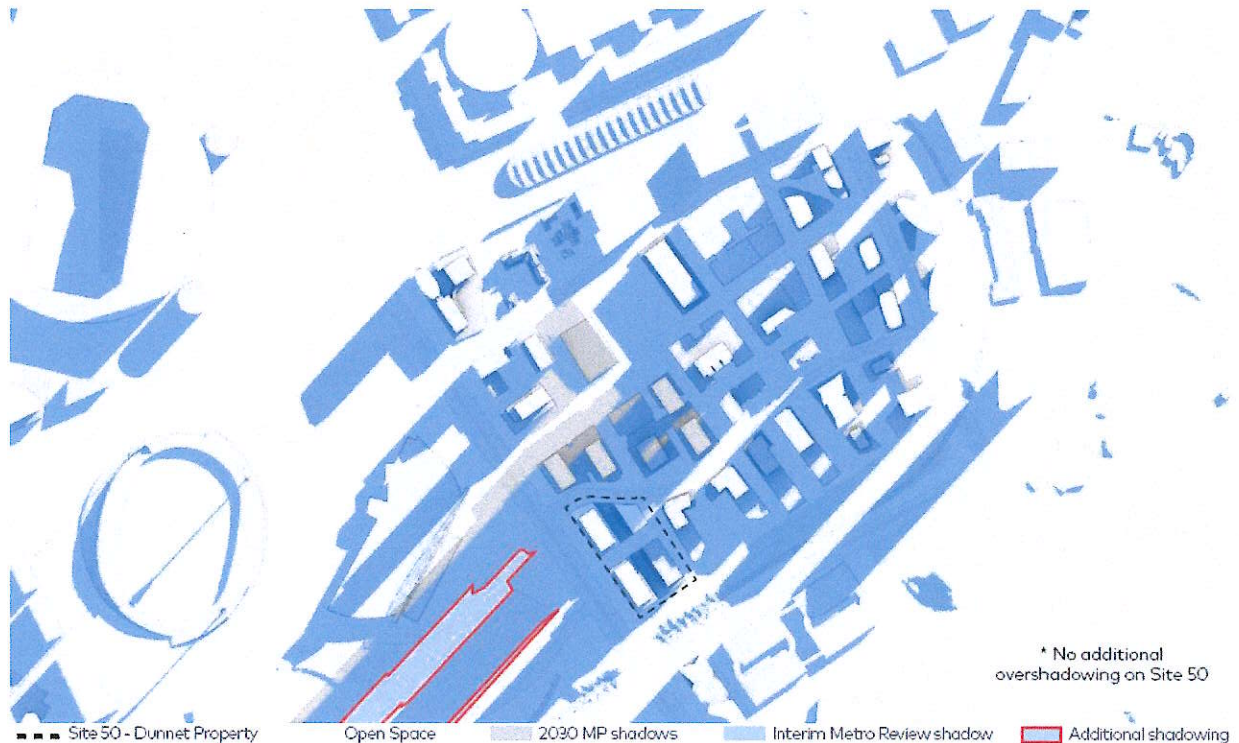


Figure 3: Cumulative overshadowing impact of Sites 47 and 48 on Site 50 – 9am on winter solstice

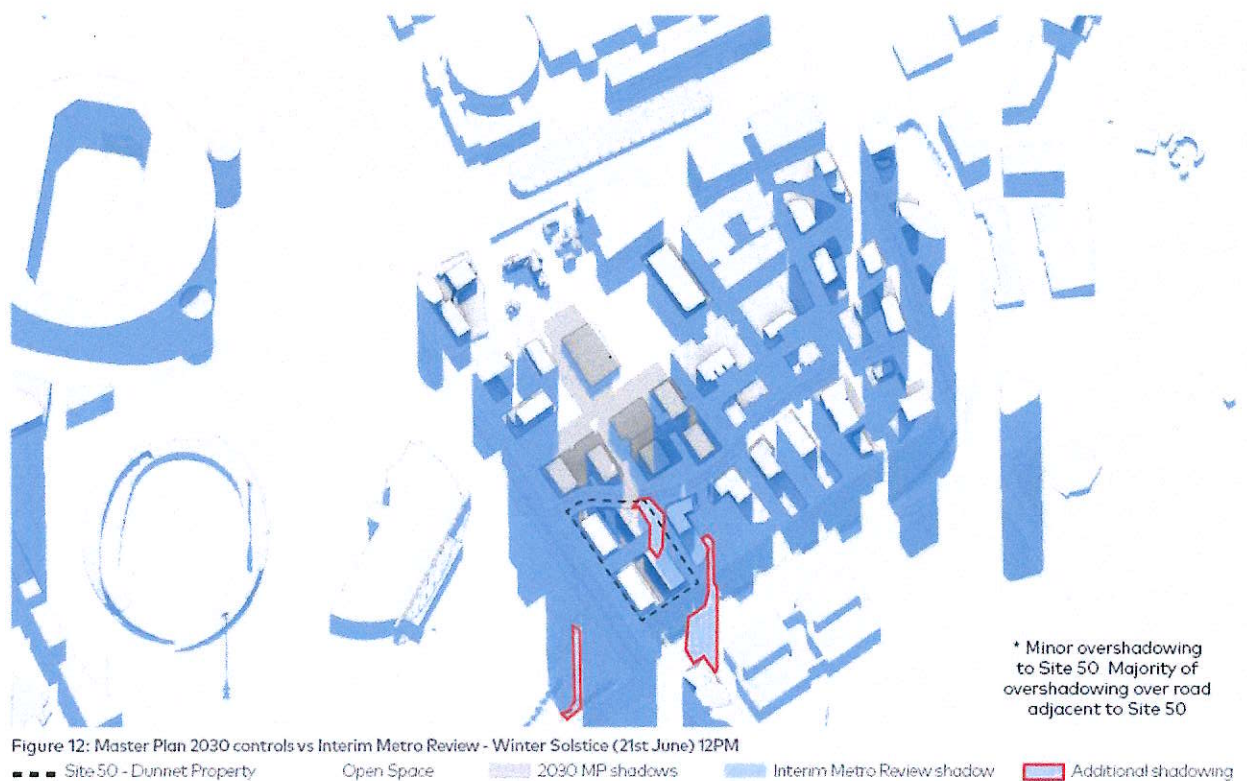


Figure 4: Cumulative overshadowing impact of Sites 47 and 48 on Site 50 – 12pm on winter solstice

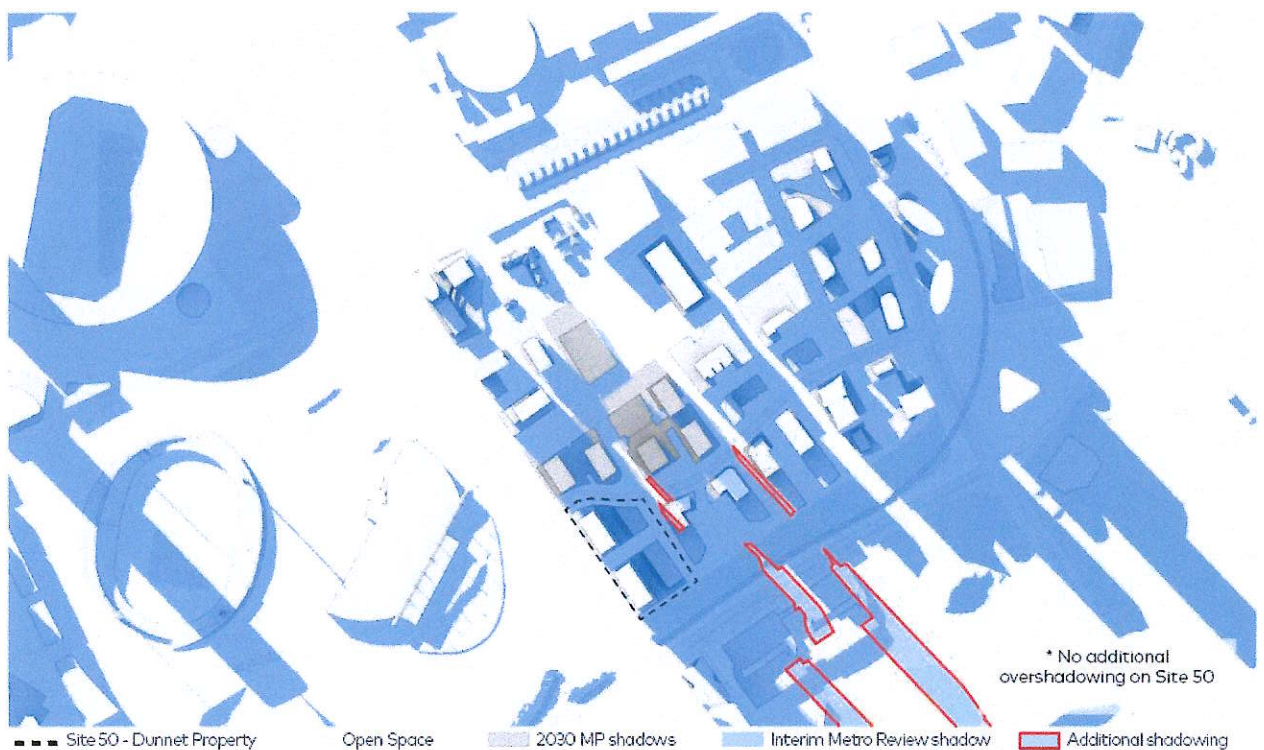


Figure 5: Cumulative overshadowing impact of Sites 47 and 48 on Site 50 – 3pm on winter solstice

Dunnet Group recommendation

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

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

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

Summary and conclusion

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

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

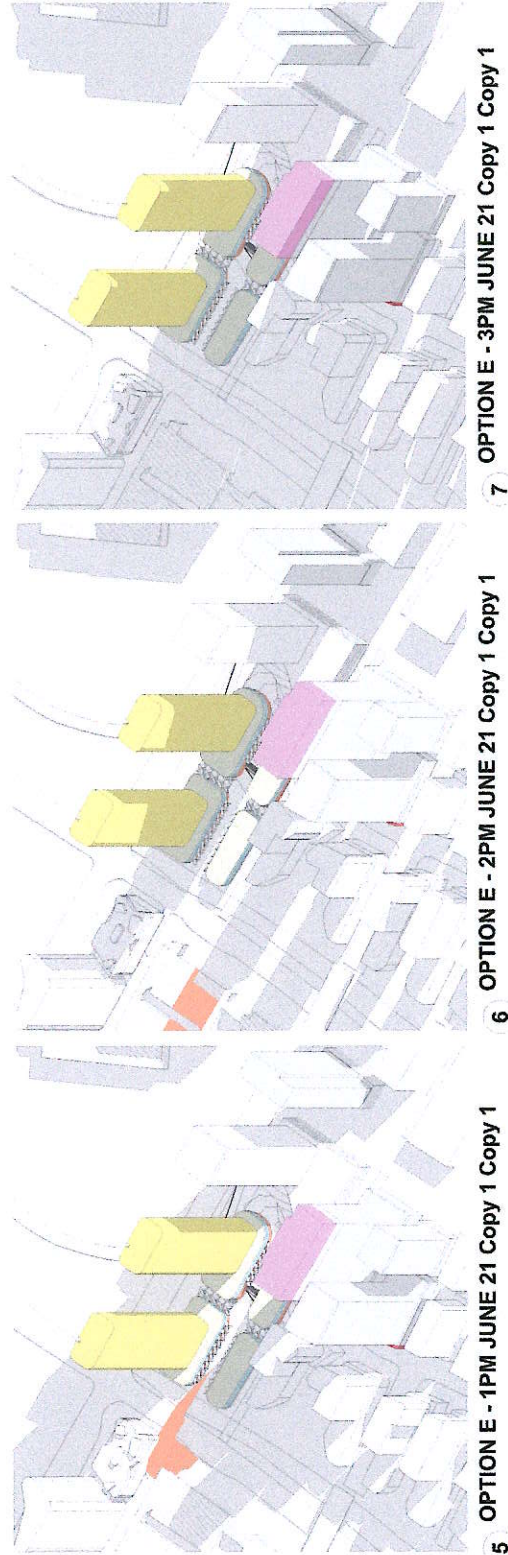
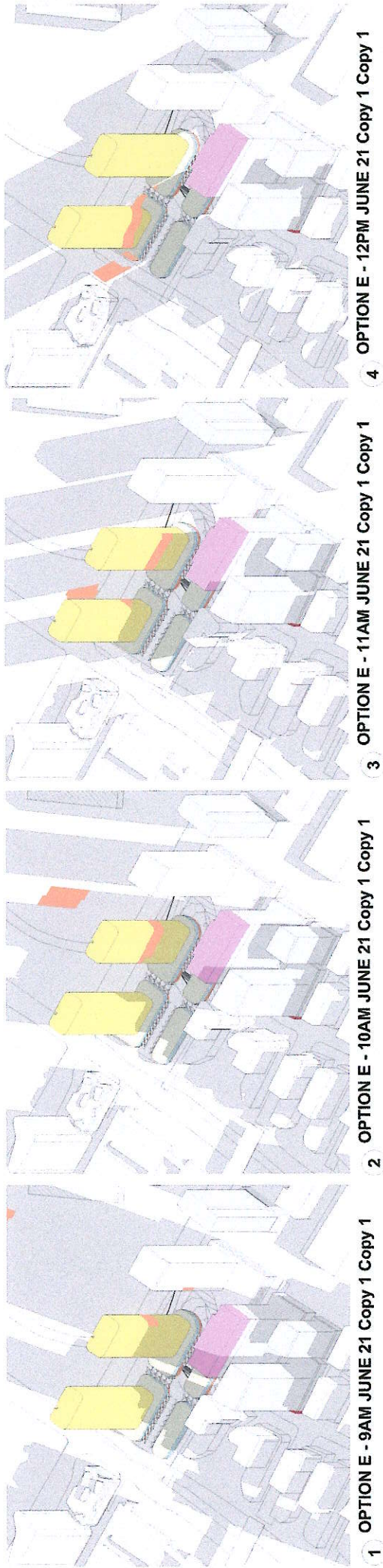
Sincerely,

Bob Dunnet

Owner

Dunnet Group

**Attachment B - Shadow Diagrams prepared by Curzon + Partners
in relation to the Reference Design for Site 50**



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|----------|-----------------|----------|--|--|---|--------------|------------------|------------------------|---------------|-----------------------|-------------|
| REVISION | NOTES | | PROJECT ADDRESS | | DRAWING TITLE SHADOW DIAGRAMS-OPTION E - PROPOSED CONTEXT | SCALE @A1 | JOB NO. 22007 | ISSUE DATE 28/11/24 | CHECKED MC | PLOT DATE 05/05/23 | DRAWN AM |
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| A | FOR INFORMATION | 22/11/24 | NOTES | | | | | | | | |
| B | FOR INFORMATION | 28/11/24 | THIS DRAWING IS COPYRIGHT AND SHALL REMAIN THE PROPERTY OF CURZON + PARTNERS. CHECK AND VERIFY ALL DIMENSIONS ON SITE PRIOR TO COMMENCING WORK. DRAWING TO BE READ IN CONJUNCTION WITH THE SHADOW STUDY REPORT. DIMENSIONS MAY VARY SLIGHTLY FROM THE SHADOW STUDY REPORT. DIMENSIONS ONLY. SILEX CLIMATE PORTION OF NIGHTSHADOWS.COM/ACT. | | | | | | | | |
| | | | CURZON + PARTNERS L 13, 234 GEORGE STREET SYDNEY NSW 2000 T +61 87055475 | | | | | | | | |
| | | | CURZON AND PARTNERS PTY LTD ACN 64993377 ISSUE PURPOSE CONCEPT ENVELOPE REV B | | | | | | | | |