

SUBMISSION RELATING TO DEVELOPMENT APPLICATION FOR 241-249 WHEAT ROAD, COCKLE BAY

INTRODUCTION

1. This constitutes an objection to the development proposed at 241-249 Wheat Road, Cockle Bay. It is made on behalf of the residents of One Darling Harbour, Pyrmont, who directly face this site.

The proposal includes:

- 12,000 sq.m of publicly accessible open space.
- 25,000 sq.m of retail space
- 85,000 sq.m of commercial space

GROUND OF OBJECTION

2. It is recognized that as part of the proposed development there are some improvements to the public domain. However, these improvements or ones similar to them can be made without the need for 110,000 sq.m of floor space.
 - The proposed tower is much too close to the waters of Darling Harbour (Cockle Bay)
 - The proposed tower is much too close to the heritage Pyrmont Bridge
 - The location and height of the tower is inappropriate from an urban design perspective

The Proposed Tower is Much Too Close To The Waters of Darling Harbour (Cockle Bay)

3. The SREP (Sydney Harbour Catchment) 2005 includes the site within the area covered by the SREP. The SREP has as its first aim the following.

“(1) This plan has the following aims with respect to the Sydney Harbour Catchment:

- (a) to ensure that the catchment, foreshores, waterways and islands of Sydney Harbour area recognized, protected, enhanced and maintained:
 - i. as an outstanding natural asset, and
 - ii. as a public asset of national and heritage significance,

for existing and future generations.”

4. The SREP identifies the whole Sydney Harbour Catchment, including its foreshores and waterways, as “a public asset of national and heritage significance.” Nowhere in the Heritage Impact Statement is there any discussion of the waterway and foreshore of Darling Harbour being of “national and heritage significance.” It is submitted that as stated by the SREP the location of the foreshore of Cockle Bay is such a location and that the tower building proposed would significantly impact on the “national and heritage significance” of Cockle Bay because of its height and its proximity to the waters of

Darling Harbour. It would introduce a jarring element into the locality which would destroy the principles which have applied at Darling Harbour for at least 28 years.

5. The SREP goes on to reinforce the inclusion of Darling Harbour (Cockle Bay) as a heritage item. Under the heading of Heritage Conservation it states the following.
6. The planning principles for heritage conservation are as follows:
 - (a) Sydney Harbour and its islands and foreshores should be recognized and protected as places of exceptional heritage significance,
7. In 2006 a Darling Harbour Building Heights study by Tony Caro included a diagram which showed building heights increasing as buildings moved away from the Harbour. While the Study did not discuss the heritage of Pyrmont Bridge, it did indicate that where the proposed tower is now located, that a height limit of 0 to 5 metres (adjacent to Cockle Bay) and 5 to 30 metres (to the Western Distributor) should apply.
8. There are no grounds upon which ignoring this standard is justified in the E.I.S.
9. In a Darling Harbour South Masterplan of 2010, prepared by JPW, states that the overall height of built form steps up as it rises away from the valley floor towards the Ultimo Pyrmont Ridge and more significantly towards the city ridges of George Street and Hyde Park.
10. The proposed tower building ignores this design principle.
11. In 2014 a study titled "The Western Harbour Precinct Design Guidelines by Woods Bagot referred to building height adjacent to the waters of Darling Harbour. It said that low lying buildings were to front the water and to embrace the public realm and provide an important human scale to the waterfront.
12. The proposed tower building ignores the stepping principle established by the three studies mentioned.

The proposed Tower is Much Too Close To The Heritage Pyrmont Bridge

13. Pyrmont Bridge is a heritage item which has suffered much abuse throughout its history. The cutting of the direct link of the Bridge with Market Street and the construction of the monorail to mention only two.
14. What is now proposed will have even more disastrous consequences. It will destroy the planning and development principles which have seen Darling Harbour evolve and emerge to where it is today.
15. Historically, all of the recent studies embrace the principle of buildings stepping up as their distance increases from the waterfront. The proposed development ignores them all.
16. The comments made concerning previous recent studies of Darling Harbour are also relevant here in considering the relationship of the tower building with the Bridge.
17. The problem which arises is that the proximity of the proposed tower building will dominate Pyrmont Bridge and diminish the heritage significance of the Bridge.

18. The EIS argues that the verticality of the tower will complement the horizontality of the Bridge. But it will stand as a very fat goal post, which must damage the significance of the Bridge. It will be seen as a very large vertical element compared with the more graceful receding horizontal form of the Bridge.
19. If a tower is to be built at all, it needs to be set back to at least as far as the western edge of the Western Distributor. Because it is located in the context of Darling Park it needs to be a smaller tower.
20. Attached as Appendix I are images included in the E.I.S. illustrating the impact of the proposed tower on the context of Pyrmont Bridge. How it can be said that the tower will complement the heritage of the Bridge is difficult to understand.
21. Attached as Appendix II are images included in the E.I.S. illustrating the relationship between the tower building and Pyrmont Bridge, together with the relationship with the existing Darling Park buildings and the proximity to the exceptional heritage qualities of Darling Harbour.
22. The location and height of the tower is inappropriate from an urban design perspective. In 2016 the Sydney Harbour Foreshore Authority produced a document titled "Darling Harbour Urban Form Strategy." This document set out "Urban Form Principles" for Darling Harbour and specifically for any redevelopment of Cockle Bay Wharf. The principles established are set out below.

COCKLE BAY WHARF

"The Cockle Bay Wharf is a food, beverage and entertainment complex on the eastern side of Cockle Bay.

Landowner guidelines:

- Maintain a balance between built form of foreshore buildings on the eastern and western side of Cockle Bay.
- Ensure no net reduction in the amount of sunlight to the public promenade and waters of Cockle Bay.
- Set back buildings and outdoor eating areas at least 20 metres from Cockle Bay to provide adequate public access and gathering opportunities.
- Present an attractive and active frontage to the public foreshore promenade to enhance the visitor experience.
- Respect the heritage significance of the Pyrmont Bridge, including its visual setting and approaches.
- Design buildings which are restrained and unpretentious and subordinate to the landmark ICC Sydney buildings on the south western side of the Bay.
- Any upgrade or redevelopment should address a preferred 18 metre foreshore building height; any additional height should be setback and designed to read as a separate element.
- Allow shared views to the water with neighbouring properties.

- Improve back-of-house arrangements and appearance; consider a more active building interface with the street achieved by consolidating service access."

23. It is clear that the proposed development does not comply with the principles specifically established for the site.

- It is not development subordinate to the landmark ICC Sydney buildings.
- It does not provide an 18m foreshore building height. The proposed tower is not setback and designed to read as a separate element. It dominates the scene.
- The proposed development does not ensure that there is no net reduction in the amount of sunlight to the public promenade and waters of Cockle Bay. It does, in fact, add considerably to overshadowing.
- The proposed development does not set buildings and outdoor eating areas at least 20m from Cockle Bay.
- The proposed development does not respect the heritage of Pyrmont Bridge.

24. This lack of satisfying the Urban Form Strategy for the site set by SHFA, amongst other matters, should ensure refusal of the current application.

Conclusion

25. Without considering the detail of this development proposal, it is clear that this is an ambit claim made with a complete disregard to the long held and established principles for Darling Harbour.

26. It does not satisfy the principles established for the site and is totally inappropriate in the context of Darling Harbour and Pyrmont Bridge. It does not produce a valley floor extending buildings in height up to the ridges of the City or Pyrmont.

27. For the reasons set out in this submission, the development proposal should be refused with advice that it will need to be dramatically modified and be consistent with the SHFA principles before further consideration can be given to redevelopment of the site.



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APPENDIX I

PHOTOMONTAGES FROM THE EIS ILLUSTRATING THE DOMINANCE OF THE TOWER BUILDING OVER THE BRIDGE



50mm - Original Image



50mm

NOTE: THESE IMAGES ARE FOR INFORMATION ONLY.
They have been prepared for view analysis purposes only.

Significant Development Applications are shown for
information and broader contextual and illustrative purposes
only.



24mm - Original Image



24mm



50mm - Original Image



50mm

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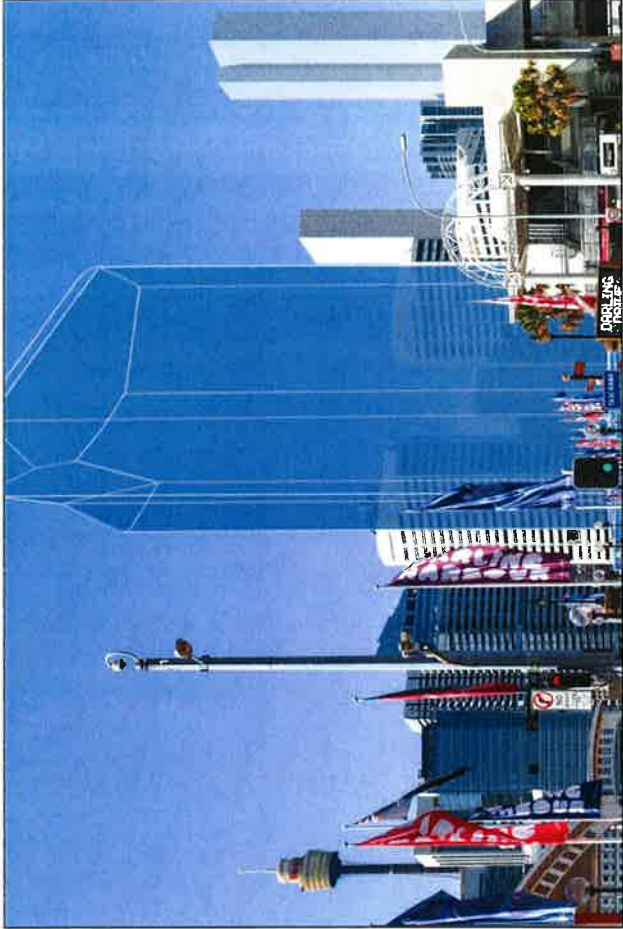
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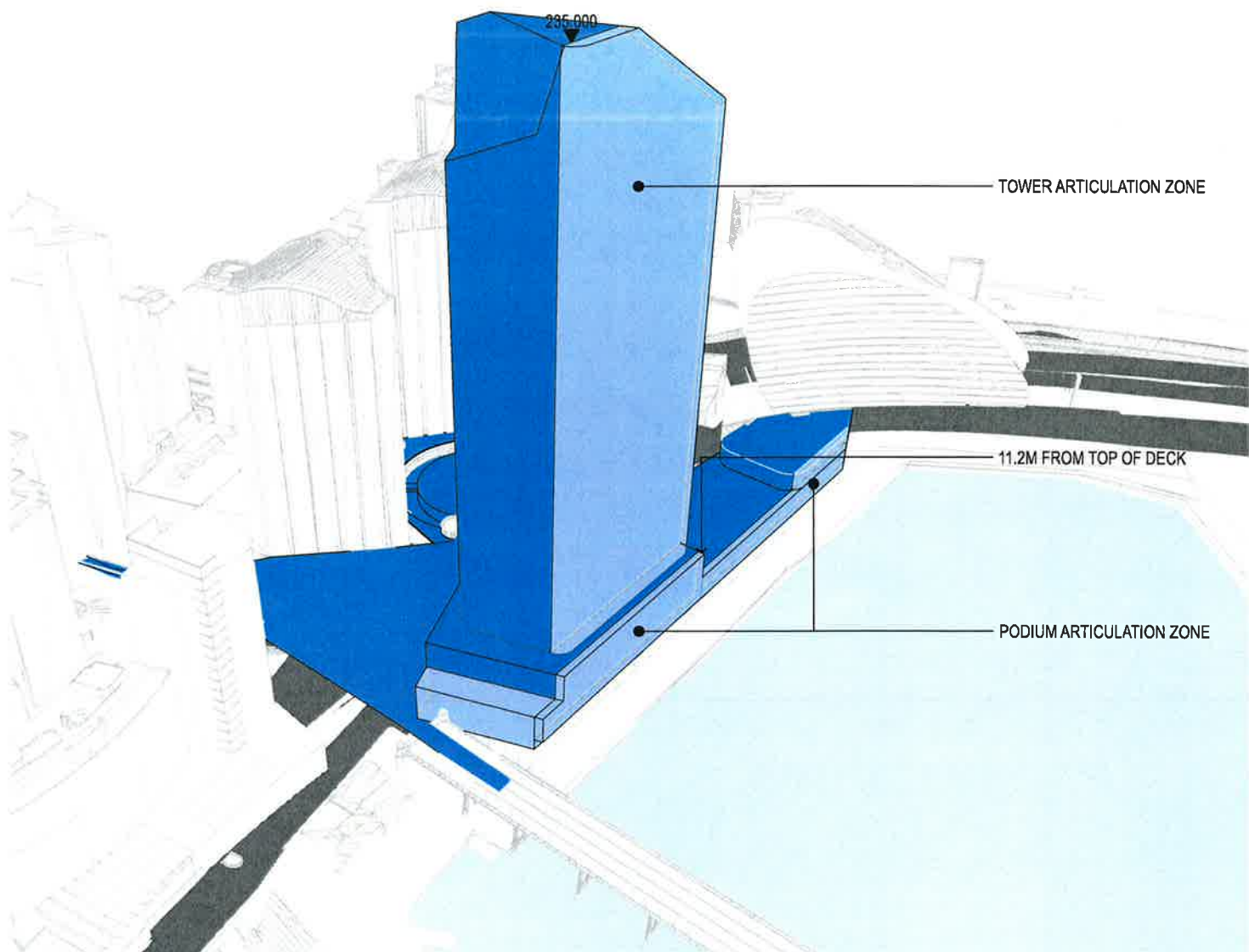
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APPENDIX II

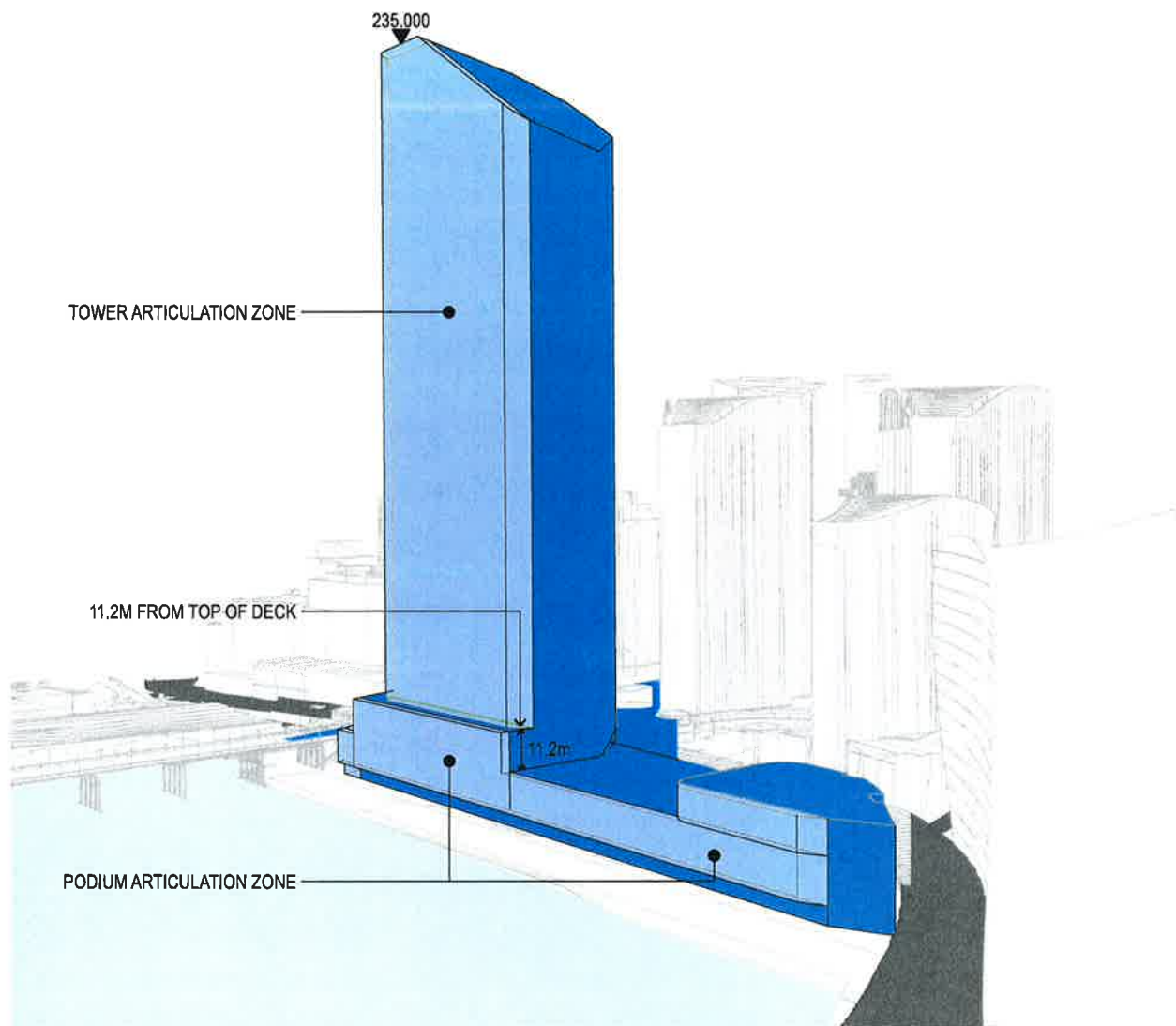
PHOTOMONTAGES FROM THE EIS ILLUSTRATING THE RELATIONSHIP OF THE TOWER BUILDING WITH PYRMONT BRIDGE, THE WATERS OF DARLING HARBOUR AND THE EXISTING DARLING PARK BUILDINGS

3D VIEW BUILDING ENVELOPE



Building Envelope - 3D View 2

3D VIEW BUILDING ENVELOPE



Building Envelope - 3D View 1