

Department of Planning & Environment
Major Project Team - Submissions
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To Whom It May Concern,

Re: Submission to AMENDED State Significant Development No. SSD 16-7684

Site: 241-249 Wheat Road, Cockle Bay

Proposal / Proposed Development: Stage 1 Concept ('Built Form Envelope')

Applicant: DPT & DPPT Operator Pty Ltd

Submission on behalf of: Tianlong Ribbon Pty Ltd (Future Owners of 'The Ribbon Hotel' at 31 Wheat Road)

1. Overview

- 1.1. This submission seeks to object in part to the **AMENDED** State Significant Development No.16-7684 known as the redevelopment of Cockle Bay Wharf at 241-249 Wheat Road, Cockle Bay ('Site') which is a Stage 1 Concept Proposal (building envelope and broad concepts only) ('Proposal' or 'Proposed development').
- 1.2. We refer to our client's previous submission dated 14 February 2017 to SSD7684 ('original concept').
- 1.3. The main reason for this objection is the impacts of the proposal on our client's adjacent property known as 'The Ribbon Hotel' which is currently under construction and the amenity of the public waterfront in or near The Ribbon.
- 1.4. This report reviews the amended design and plans/reports on the Department of Planning & Environment's (DPE's) website, but predominantly focusses on the:
 - a) Amended Environmental Impact Statement ('EIS') by Ethos Urban;
 - b) Amended Architectural Design Report & Drawings by FJMT Architects ('FJMT Report');
 - c) Amended Visual & View Impact Analysis by Ethos Urban/Virtual Ideas; and
 - d) Pedestrian Assessment by ARUP.
- 1.5. We appreciate that this is a Stage 1 Concept Application (envelope design only) and subject to a Design Excellence Competition that would resolve the detail and that there will be further opportunities for consultation during the Stage 2 Detailed Design process. Whilst an indicative design has been provided we have to base our feedback on the impacts on the full envelope until the Stage 2 design is assessed.
- 1.6. It is important to note that we support the direction many of the changes are heading including, but not limited to the relocation of the secondary (southern) 'pavilion' tower further north with reduced footprint and podium height/massing towards the southern end of the lease boundary, improved public open space and connectivity (particularly towards the north), and improvements to the Druitt Street access to the waterfront. The amended scheme shows improved setbacks of the podium and secondary tower improving views to The Ribbon Hotel. These improvements should be maintained.
- 1.7. In summary, we object primarily to the relocation of the primary tower further south, closer to The Ribbon Hotel and the height of the proposed primary tower. Whilst the height has been reduced it is still maximised under the Tumbalong Park Sun Plane and would have substantial impacts on the public waterfront area and The Ribbon in terms of shadow and dominance. There is also some uncertainty about the extent of the ground level podium envelope at the southern end and it should not take up the entire lease area as it will create insufficient building separation to The Ribbon Hotel at the ground level.

2. Key Concerns

- 2.1. **Primary Tower Height:** The primary tower envelope has reduced in height from a maximum of RL235 to RL195 (see Figure 12 below), falling to RL179 in south-west corner. However, at RL195 this building still dominates the waterfront and surrounding buildings (see visual study below) and is potentially inconsistent with the city skyline and lowering of heights towards Cockle Bay. Whilst our client agrees that a 'point tower' is likely to have less impact than a squat continuous 'podium wall' building (of similar GFA) and the site can certainly support some height and FSR, the amended scheme does not produce appropriate urban design and amenity outcomes consistent with the planning for the Darling Harbour area.

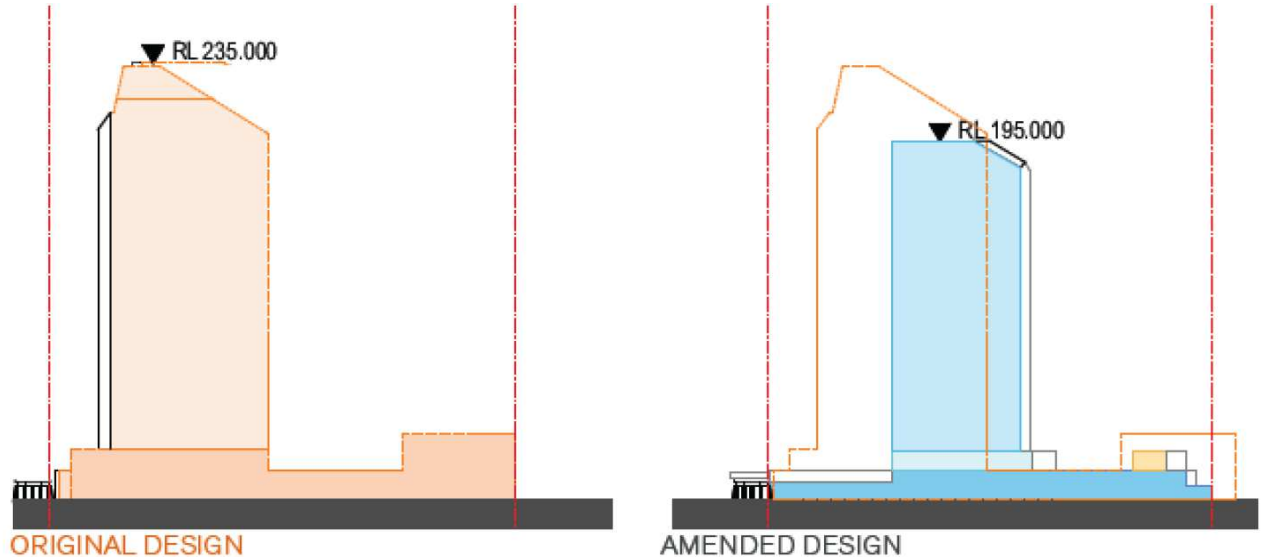


Figure 12 - Reduction in scale

Source: FJMT

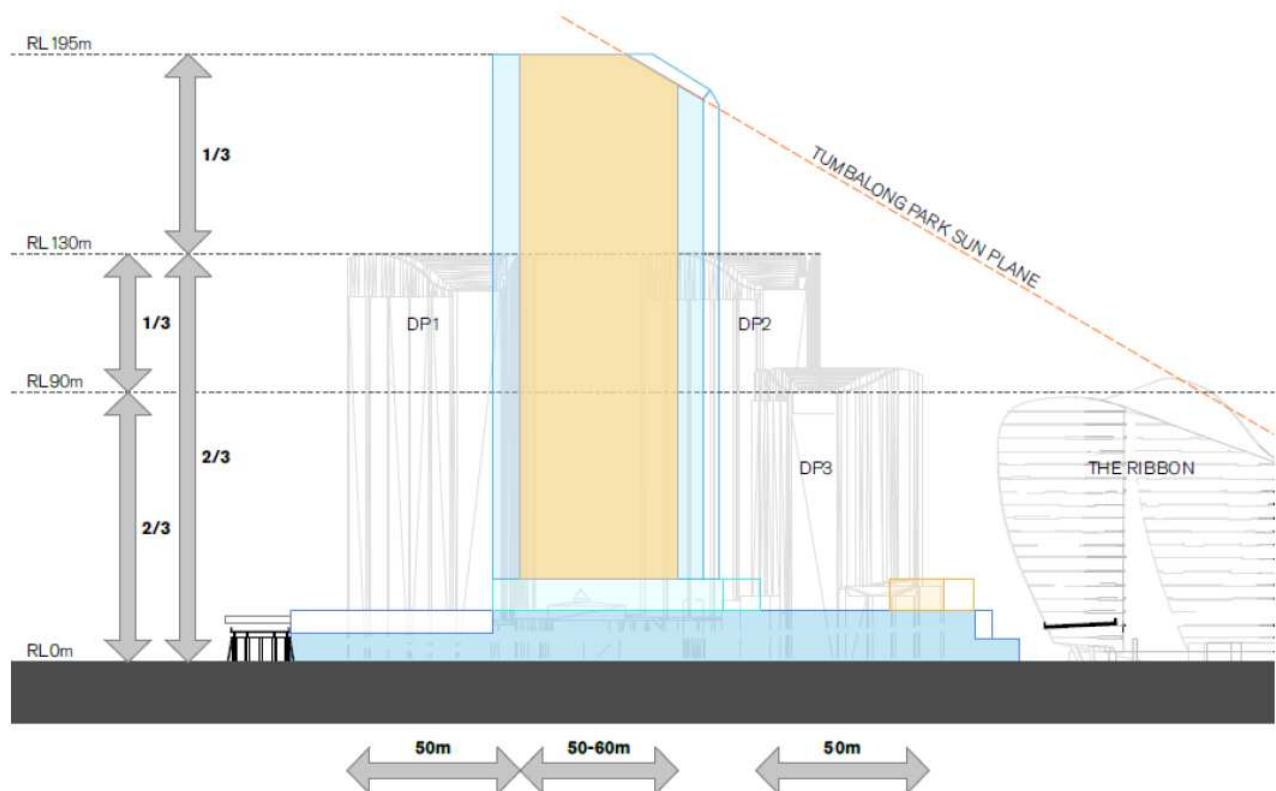


Figure 15 - Height and Scale relationship

Source: FJMT

2.2. **Primary Tower Proportion:** The proportional scale argument suggested by Figure 15 above (and page 59 EIS) is weak and is driven strongly by the Tumbalong Park Sun Plane. Stepping up building heights towards the waterfront, particularly when the tower will only have a minimum 6m setback from the lease boundary/podium, will dominate the waterfront and surrounding buildings. Whilst the EIS seeks to use Barangaroo as a supporting departure from the 'valley floor' principle for building height this is an inappropriate precedent and too far removed from the context of the site. The Applicant's reference to The Ribbon height (page 59 EIS) in no way supports the proposal when it is approximately twice the height of The Ribbon.

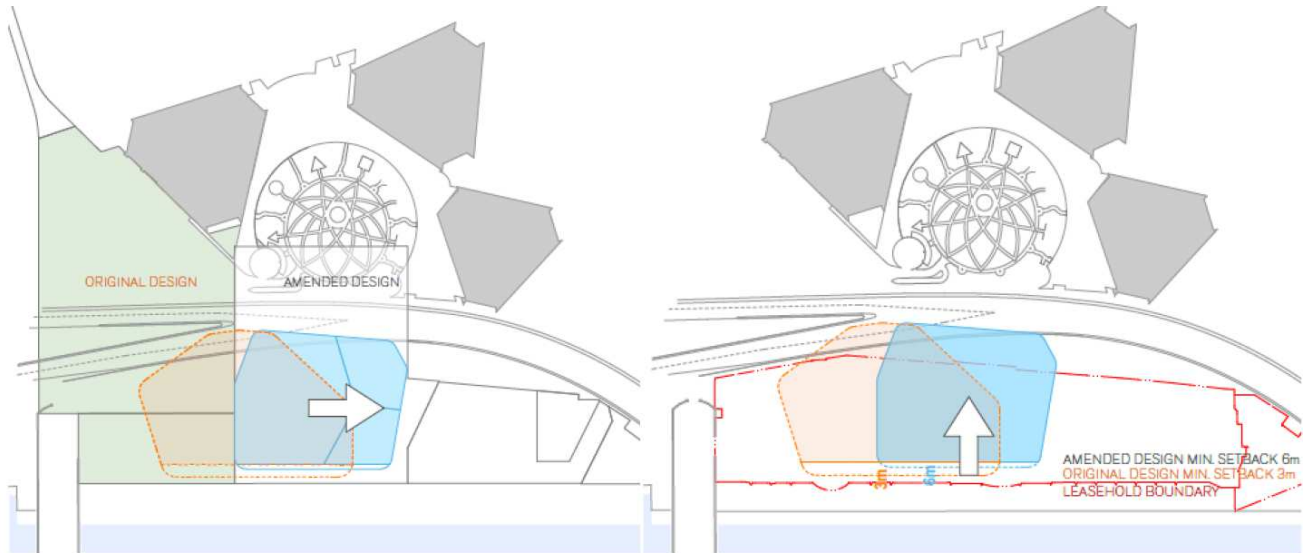


Figure 10 - Relocation of tower

Source: FJMT

2.3. Primary Tower Location & Height:

- a) The primary tower envelope has moved south by ~30m i.e. closer to The Ribbon Hotel (see Figure 10 above). This is called the 'Central Tower' option (in comparison to the original 'Northern Tower' option in the original scheme). In the original proposal the southern edge of the primary tower was ~130m from the southern edge of the leasehold boundary. In the Amended proposal it is closer to 100m.
- b) The reduction in height appears to be solely in response to the shift in the tower location to the south but it still seeks to achieve the maximum height under the Tumbalong Park Sun Plane (see Figures 12 & 15 above). In effect, the reduction in height of the tower does not improve the bulk/scale/shadow relationship to The Ribbon Hotel and adjacent waterfront area as the reduced height is offset by greater proximity.

2.4. Primary Tower Bulk/Floorplate:

- a) We acknowledge that the tower envelope has reduced from an area of 3,890m² to 3,575m² (noting that in both schemes the resulting tower is meant to only take up 60% of the envelope floorplate).
- b) However, as Figure 10 above shows, whilst the bulk of the envelope floorplate has decreased in a north-south direction it is now squarer in shape and instead of narrowing to the south (to reduce the scale/bulk to the south and potentially allow greater penetration of morning sun to the southern waterfront) it is wider and bulkier at the southern edge of the tower.
- c) The setback from the waterfront may have increased the minimum slightly (3m to 6m), but continues to provide an 8m weighted average setback that is insufficient to offset the dominance of the tower over the waterfront. Whilst the site has limitations to how far east the tower can be setback, the proposed height in combination with this minimal setback is not consistent with the desired character, amenity, scale and public importance of the Cockle Bay waterfront.

- d) There are very limited view angles provided in the View Impact Analysis looking towards the southern end of the bay to assess the impact of the proposed envelope. The figure below shows that the tower dominates the waterfront and this would become more apparent if views were provided in closer proximity looking south towards The Ribbon Hotel.



2.5. Shadow Impacts:

- a) There is no shadow comparison between the original concept and the amended concept so it is difficult to determine accurately the change in shadow impact. Also, there is no façade shadow analysis on the northern face of The Ribbon Hotel and adjacent waterfront area to determine specific impact.
- b) However, moving the tower further south appears to reduce solar access in the morning to The Ribbon and adjacent waterfront area approximately a half hour earlier than the original concept (at 9am rather than approximately 9.30am).
- c) The shadow from the tower appears to move to the east of The Ribbon approximately at 1pm which is similar to the original concept – so the overall length of impact has increased.
- d) The public waterfront in front of The Ribbon is one of the key gathering spaces and a node / gateway for connection throughout Darling Harbour so shadow impacts should be minimised. This is a fundamental reason to step building height down towards the waterfront.
- e) Whilst the Tumbalong Park Sun Plane is maintained, there is little discussion of the morning shadow impacts of the original or new location on very important public space / waterfront in front of The Ribbon Hotel.
- f) The application acknowledges that roof forms may penetrate the envelope maximum height during the Stage 2 process and potentially create additional overshadowing.

- 2.6. **Wind Impacts:** The amended tower form will still result in wind impacts near the base of the tower and continues to rely on later design treatments to minimise or mitigate impacts. We suggest that the minimal setbacks of the tower above the podium may impact pedestrian amenity along the waterfront and podium levels.

- 2.7. **Podium Length & Setback from Waterfront:** The Proponent claims that the podium is reduced from 209 to 144m. However, the envelope at the southern end (ground level) still extends to the southern end of the lease boundary. We suggest that the podium should not extend past the line of the Druiitt Street pedestrian bridge and stairway to the waterfront as shown in the indicative designs.

3. Recommendation

We suggest the scheme should be further amended as follows (subject to detailed design):

- 3.1. Push the Primary Tower at least another 10-15m north whilst providing good separation to Pymont Bridge and public open space;
- 3.2. Reduce the Primary Tower height to at least RL150 with no additional penetrations for roof articulation above that height;
- 3.3. Reduce the Ground Level Envelope at the southern end to accord with the indicative design shown for the Druiitt Street pedestrian bridge/waterfront access i.e. not permit it to extend to the southern boundary of the lease.

We note that the Proponent proposes to meet with GROCON during the review / amendment process and may contact people who have made submissions – and suggest that The Ribbon Hotel owners should be included in any discussions as the end owners of the building.

Please contact me if you have any queries.

Regards



Andrew Napier

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