

3 July 2019

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Jess Fountain  
DA Coordinator, Key Sites and Industry Assessments  
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Level 29, 320 Pitt Street  
Sydney NSW 2000

Attention: Rodger Roppolo, Planning Officer  
[rodger.roppolo@planning.nsw.gov.au](mailto:rodger.roppolo@planning.nsw.gov.au)

Dear Rodger,

**Crown Sydney Hotel Resort, Barangaroo South - SSD 6957 MOD 1**

Thank you for your correspondence, dated 12 June 2019 inviting the City of Sydney to respond to the proposed modification of SSD 6957 relating to the Crown Sydney Hotel Resort (CSHR) at Barangaroo South.

The City maintains its objection to the subject development as per previous correspondence dated 9 September 2015 and 5 November 2015. Further objection is raised regarding the proposed modifications to the approved design, particularly in regards to the public domain and building interface fronting the waterfront promenade, wind mitigation impacts at the ground level, transport and traffic impacts and potential social impacts.

**Transport**

The proposed increased parking rates for all uses within the site are excessive and counter to sound urban planning and concept plan principles. The overall parking rates proposed in the development are noted to be almost four times higher than similar sites in surrounding areas subject to provisions set out by the Sydney Local Environmental Plan 2012. Encouraging excessive car use into the area will have the potential to lead to increased conflicts between pedestrians, cyclists and vehicles and reduce the amenity for people using the precinct (including drivers), noting that the existing road network in Barangaroo (Barangaroo Place and Watermans Quay) is designated as 'Places for People' in the NSW Government's Movement and Place Framework.

Further, the proposed parking provision is counter to the significant investment in public transport and public space within the area and to the design of the roadways in the precinct, noting that the site is adjacent to the forthcoming Metro station, within a very easy walking distance of the Barangaroo Ferry stops, and trains at Wynyard station via Wynyard Walk.

The submitted transport study fails to address potential queuing within the carpark, queuing on the ramp and surrounding streets with the inclusion of vehicle entry gates, how the increase in valet parking will impact use of the Porte Cochere or how the increase in overall parking spaces will impact loading functions within the site. Further, residential bicycle parking spaces are not shown on any plans for Basement 2 although mentioned in supporting written documents and safety concern is raised regarding staff bicycle parking and end of trip facilities split between two basement levels.

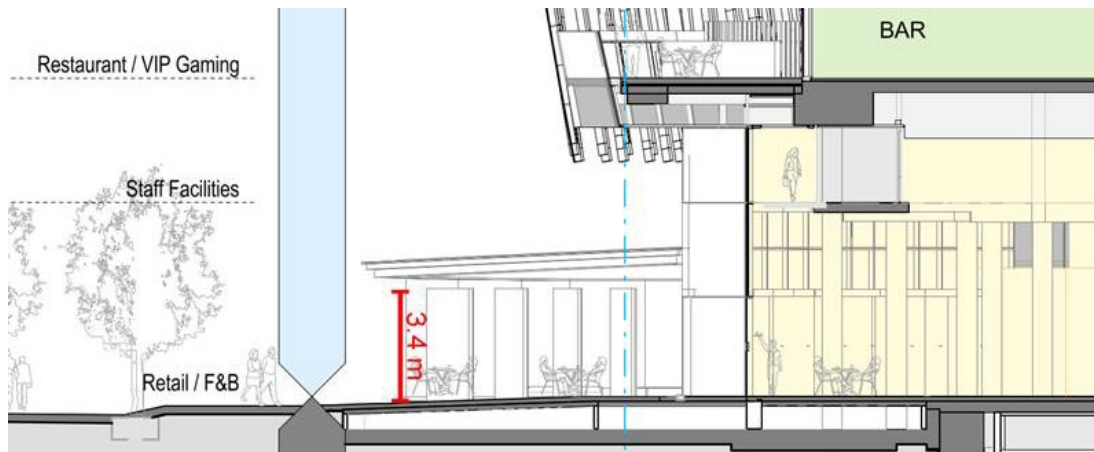
### Wind mitigation

The proposed wind mitigation efforts on the ground floor are considered to have a detrimental impact on the public domain with the introduction of full height blades to the outdoor bar terrace.

The enclosure and further privatisation of an outdoor terrace as shown in Figures 1 and 2 below encroaches on the suggested 25m setback of the building at the ground floor and reduces the width of the open space from the water's edge to only 16.7m. The introduction of 3m high wind blades at the north-western bar terrace proves to enclose an approved outdoor space with little improvement to outdoor pedestrian comfort within the public domain, failing to adequately address wind impacts of the development on the already reduced public promenade.



**Figure 1** Building setbacks from the water's edge and location of proposed wind breaks in red (excerpt from drawing number 00915-P-0103-TP *Site Plan – Ground floor* prepared by Wilkinson Eyre)



**Figure 2** Proposed wind breakers in outdoor bar terrace (excerpt from drawing number 00915-S-2003-TP Section CC Hotel prepared by Wilkinson Eyre)

### **VIP Restricted gaming facility to “Mass Gaming” premises**

It is unclear and has not been explained anywhere in supporting documentation what the conversion of the large VIP gaming floors on Levels 1 and 2 to “Mass Gaming” floors involves. “Mass Gaming” implies that these levels are being converted to general public gaming floors, completely inconsistent with all previous attempts in restricting access to the gambling facilities that the site provides. The application must provide urgent clarification on whether CSHR seeks to amend the current restricted gaming license to “general public” through ILGA.

The Social Impact Assessment (SIA) that was submitted as part of the original application noted the general public will only have access to the entertainment and retail offerings of the site and the issue of a “Restricted Gaming Facility” license for VIP members only will provide a *“significant decrease in the potential of problem gambling”*.

The SIA further states *“given the nature and intended operation of the Restricted Gaming Facility within CSHR, it is apparent that this component of the project represents a minimal addition to Sydney’s aggregate supply of gambling venues and is therefore considered a minimal public risk”*.

The initial attraction of a restricted gaming facility was that there would be a financial appeal by capitalising the harbour side’s potential to attract and capture a premium tourism spend in international markets whilst having a minimal impact on vulnerable members of the general public. No such supplementary SIA has since been submitted justifying the conversion of two large gaming floors from VIP to “Mass Gaming” and what its relevant impacts are on a micro and macro scale.

### **Residential component**

The proposal has still made no effort to provide an adequate dwelling mix at the site by remaining to only include apartments with 2-5 bedrooms. The City’s objection remains in that absence of GFA dedicated to affordable and key worker housing it is not in the public interest.

Further, the proposed residential component of the site fails to achieve various design principles as per the State Environmental Planning Policy No 65 – Design Quality of Residential Apartment Development, primarily in terms of providing inadequate private open space and relying on an outdoor terrace also used by VIP hotel members as “communal open space”. Additionally, evidence has not been provided to confirm apartments receive adequate solar access within living areas and on balconies. No such shadow and solar access assessment has been provided for review and compliance cannot be confirmed.

Should you wish to speak with a Council officer about the above, please contact Marie Burge, Planner, on 9265 9333 or at [mburge@cityofsydney.nsw.gov.au](mailto:mburge@cityofsydney.nsw.gov.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'G Jahn', with a stylized, flowing script.

**Graham Jahn AM**  
**Director**  
City Planning | Development | Transport