

# **Darling Harbour Live Hotel**

## **SSD 13\_6116**

Submission to NSW Department of Planning and Infrastructure  
4 November 2013





**City of Sydney**  
ABN 22 636 550 790  
GPO Box 1591 Sydney NSW 2001 Australia

Town Hall House 456 Kent Street Sydney NSW 2000 Australia  
Phone +61 2 9265 9333 Fax +61 2 9265 9222 TTY +61 2 9265 9276

[council@cityofsydney.nsw.gov.au](mailto:council@cityofsydney.nsw.gov.au)  
[www.cityofsydney.nsw.gov.au](http://www.cityofsydney.nsw.gov.au)

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## Contents

<b>1.0</b>	<b>Executive Summary .....</b>	<b>5</b>
<b>2.0</b>	<b>Background .....</b>	<b>8</b>
2.1	Government Response to Loss of Exhibitions and Conventions in Sydney ....	8
2.2	Expressions of Interest .....	10
2.3	City of Sydney Outline Submission .....	11
2.4	Preferred Proponent and Preferred Master Plan .....	12
2.5	Approval for new Convention, Exhibition and Entertainment Centres.....	12
2.6	Proposed Development .....	13
<b>3.0</b>	<b>Built Form and Urban Design .....</b>	<b>15</b>
3.1	Pedestrian amenity .....	15
3.2	Wind impacts from tower form.....	18
3.3	Tower footprint.....	18
3.4	Enclosure of internal corridors.....	19
<b>4.0</b>	<b>Traffic, Parking, Cycling and Walking.....</b>	<b>21</b>
4.1	Drop off and pick up.....	21
4.2	Bicycle parking and end-of-trip facilities .....	21
<b>5.0</b>	<b>Sustainability Measures .....</b>	<b>23</b>
<b>6.0</b>	<b>Crime Prevention Through Environmental Design.....</b>	<b>25</b>
6.1	CCTV .....	25
6.2	Loading Facilities .....	25
6.3	Lighting and Signage .....	26





***Figure 1. Photomontage of proposed hotel with approved Convention Centre in background and Harbourside Shopping Centre in foreground***  
*Source: Proponent SSD Application*

## 1.0 Executive Summary

This submission responds to the development application for the Darling Harbour Live Hotel (proposed hotel) submitted to the Department of Planning and Infrastructure (DoPI) by the *Darling Harbour Live* Consortium (Proponent). This follows an INSW tender process and project development agreement(s) executed for the construction and management of the Sydney International Convention, Exhibition and Entertainment Precinct (SICEEP).

The City acknowledges that the availability of a sufficient number and price range of hotel rooms is a core requirement for event planning for convention, exhibition and entertainment activities. An additional acknowledgement in this case is the Public Private Partnership arrangement which reduces the cost of providing the SICEEP major facilities to the NSW Government by facilitating revenue from the development of the balance of the SICEEP site. Offset revenue from “at least one premium hotel” was recommended to the NSW Government by Infrastructure Partnerships Australia in 2011.

With some essential qualifications, **there is general support for the proposed hotel as a concept envelope provided that an architectural competition is required** to provide a more sculptural architectural outcome given the prominence of the site. Key aspects of the proposal are summarised as follows:

- The proposed Darling Drive interface of the hotel is supported generally, with ground plane lobby activities at street level and pre-function, meeting, restaurant and staff facilities along the podium edge;
- The proposal provides some shadow impact onto Tumbalong Park in the afternoon in mid-winter;
- A single tower form compared to the tender design has a net reduction in view loss and overshadowing impacts on surrounding development;
- The proposal to provide zero car parking is consistent with the City’s parking controls and relies on people either not using a car, making use of a local public parking station or using the drop-off, pick-up portal;
- Podium design interest is moderated and relatively subdued compared to the previous two-tower design;
- The ground plane however is potentially dominated by vehicle movements and future road surfaces and kerbs and therefore should be rearranged for porte-cochere access directly off Darling Drive for a more pedestrian friendly ground plane.





**Figure 2. (top) Photomontage of proposed hotel positioned north of approved convention, exhibition and entertainment facilities.**

*Source: Proponent SSD Application*

**Figure 3. (bottom) Photomontage of previous two-tower hotel design with earlier designs for convention, exhibition and entertainment facilities**

*Source: Proponent Preferred Master Plan, December 2012*

## Executive Summary Outline

This submission provides key recommendations regarding public domain, built form, transport, sustainability and crime risk issues.

The City has reviewed the EIS and makes the following summary of recommendations:

1. The orthogonal form is simplistic and brutal. It is of a similar height and scale in its context as the UTS tower building. The approval should be a concept outline only, requiring design amendments and an architectural competition for a more sculptural landmark building in such a prominent location
2. Harbourside Place should be clear of hotel vehicular traffic. The porte-cochere should be directly contiguous with Darling Drive via a slip lane. Any vehicle access within the site should be limited to the minimum operational requirements
3. The tower footprint should be confined to 1,000 m<sup>2</sup> and the tower edges setback from the podium
4. Improve environmental performance by extending the hotel internal lobbies to the tower edge
5. Bicycle parking and end-of-trip facilities for hotel staff should be incorporated
6. The Proponents should target a minimum NABERS or GBCA sustainability rating, which would assist in defining key sustainability expectations; and
7. Crime Prevention Through Environmental Design techniques should be strengthened in the detailed design phase.

The submission **Overview** is found in **Section 2** of this report.

The detailed submission **Recommendations** are found in **Sections 3, 4, 5 and 6**.

It is anticipated that the Proponents will be required to lodge a Response to Submissions Report or Preferred Project Report, at which point the City may provide recommended conditions of consent.

## 2.0 Background

### 2.1 Government Response to Loss of Exhibitions and Conventions in Sydney

From around 2008, the Iemma/Rees/Keneally Governments requested the Sydney Harbour Foreshore Authority (SHFA) in their capacity as land owner and manager to develop design proposals to rework and upgrade the existing entertainment, exhibition and convention facilities. Limitations of the current facilities, and primarily the lack of functionality for dual-facility events, as well as feedback from the event industry, were primary drivers behind the decision to stem the tide of losing major events to competing cities. Master plan proposals including those of COX architects, the original exhibition centre designers, were developed. However, this approach appears to not have been bipartisan and by March 2010, then Opposition Leader Barry O'Farrell announced<sup>1</sup> that a fresh approach would be taken and a new fast-tracked and expanded convention and exhibition facility would be launched through a public private tender process by the Coalition while still in Opposition.

In September 2010, a detailed report by Price Waterhouse Coopers (PwC) commissioned by Infrastructure Partnerships Australia updated and readdressed the rationale for convention/exhibition facilities, reviewed current facilities, considered location options for new facilities, as well as delivery and funding models and risk allocation. Five potential locations for new or redeveloped facilities were the subject of a high-level desk-top commentary and included:

- Darling Harbour (allowing the existing Entertainment Centre to be included in the scope)
- Sydney Showground, Homebush
- Airspace over rail lines at Central Station
- Glebe Island and White Bay
- Barangaroo and Millers Point

The PwC report concluded that Darling Harbour was the best location for either new or expanded (reworked) facilities due to the ability to leverage higher levels of established

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<sup>1</sup> <http://www.smh.com.au/nsw/convention-centre-backed-20100302-pgf0.html>



foot traffic<sup>2</sup> for ancillary use revenues (e.g. a hotel) and ability to integrate with existing facilities surrounding Darling Harbour including the CBD, existing major hotels and transport networks<sup>3</sup>. The number of existing hotel rooms (and their dependency on the existing facility being nearby) and the proximity of the Darling Harbour site to a number of stations on the existing and soon to be expanded light rail network were significant advantages for delegates and workers at the Darling Harbour location without precipitating duplicate costs.

Although elected in March 2011, the NSW Coalition had formulated their current approach while in Opposition and adopted early actions largely consistent with the recommendations contained in the January 2011 report by Infrastructure Partnerships Australia (IPA)<sup>4</sup>. These were adopted prior to taking power.

The key recommendations in the 2011 IPA report were (with the City's emphasis in **bold**):

- A new convention centre should be brought to the market within 6 months of the election and commissioned by 2015
- The facility should be world-class
- The site should be Darling Harbour and involve the largest possible site area (including the Sydney Entertainment Centre and car park)
- A new entertainment facility should be included for up to 10,000 people
- The project should be managed by a new agency being Infrastructure NSW with appropriate powers
- The planning risk should not be transferred to the private sector
- The project should be delivered under a Public Private Partnership model like the Melbourne equivalent

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<sup>2</sup> Darling Harbour attracts 27 million visitors per annum; p19 PwC Report: A World Class Convention and Exhibition Centre for Sydney: Prefeasibility Study

<sup>3</sup> p.18 PwC Report *ibid*

<sup>4</sup> The Infrastructure Partnerships Australia Report: Towards a New Convention and Exhibition Centre Project for NSW was endorsed/supported by Australian Tourism Export Council, Property Council of Australia, Sydney Business Chamber, Tourism and Transport Forum and assembled by PwC, Minter Ellison and Crone Studios. [www.infrastructure.org.au/DisplayFile.aspx?FileID=583](http://www.infrastructure.org.au/DisplayFile.aspx?FileID=583)

- **The project should encourage additional revenue streams to lower costs, including parking, at least one premium hotel and retail;**
- The PPP should be based around an availability payment – with appropriate upside from related development (i.e. southern ‘Haymarket’ precinct); and
- The project should be brought forward to co-ordinate with other projects (Barangaroo, UTS, CBD etc.)

## **2.2 Expressions of Interest**

In September 2011, expressions of interest were invited by the O’Farrell Government from developers and facilities managers for the Public Private Partnership redevelopment of the existing convention, exhibition and entertainment centres. Bidders were invited to offset costs by revenue streams from the development of the balance of the site. Two proponents were shortlisted, one led by Lend Lease and the other by Multiplex. Each bid featured a hotel to the north of a reworked Convention Centre. Darling Harbour Live’s bid contained two hotel towers joined by a common and appealing podium, one for a standard hotel offering and the other for a premium offering.



**Figure 4. PPP Component of Proponent's Preferred Master Plan**  
Source: Proponent PPP SSD Application

### 2.3 City of Sydney Outline Submission

In May 2012, Council resolved that the City of Sydney be closely involved in the development process for the SICEEP project and its interface with the surrounding streets and urban conditions. This involvement would allow the City to provide input

into the 'preferred master plan' by sharing expertise regarding the planning, design and access issues that affect the precinct.

In July 2012, an outline submission was provided by Council to INSW that set out a number of core design, access and built-form considerations as well as principles that should guide a high quality and integrated development across the SICEEP site. For the proposed hotel site, the City recommended the scale of any towers be approximately RL 100 to preserve solar access to key public open space, that design excellence should be achieved through a design competition and other more detailed design considerations.

## **2.4 Preferred Proponent and Preferred Master Plan**

In December 2012, Premier O'Farrell announced the selection of the preferred proponents, *Darling Harbour Live*, consortia containing Lend Lease, Capella Capital, AEG Ogden and Spotless, and revealed the proponent's *Preferred Master Plan* (Figure 4).

By March 2013, a PPP DA for the redevelopment of the convention, exhibition and entertainment centres was submitted to the Department of Planning and Infrastructure by the Darling Harbour Live consortia.

## **2.5 Approval for new Convention, Exhibition and Entertainment Centres**

On 22 August 2013, the Minister for Planning and Infrastructure, granted consent to the redevelopment of the convention, exhibition and entertainment centres.

The consent provides for a strong southern interface between the approved convention centre and the proposed hotel. The following elements have been approved:

- Hassell's modern convention facility, including expanded pre-function areas, ballroom and theatres, relatively larger and more functional than the existing counterparts
- A shared zone off Darling Drive known as "Harbourside Place", with a vehicle drop off zone for the convention centre
- The public domain around the south-western corner of Darling Harbour and the north-south alignment to Hay Street to be upgraded generally
- The existing crossing to and from the Convention Centre light rail station to be upgraded and signal controlled (Condition C1 of the development consent)
- Pedestrian access and legibility to the light rail stops is to be improved (Condition C13 of the development consent)



- New driveway crossings on Darling Drive to be designed with continuous footpath paving (Condition 13 of the development consent); and
- A revised wayfinding and signage palette to be introduced around the interface (Condition G10 of the development consent).

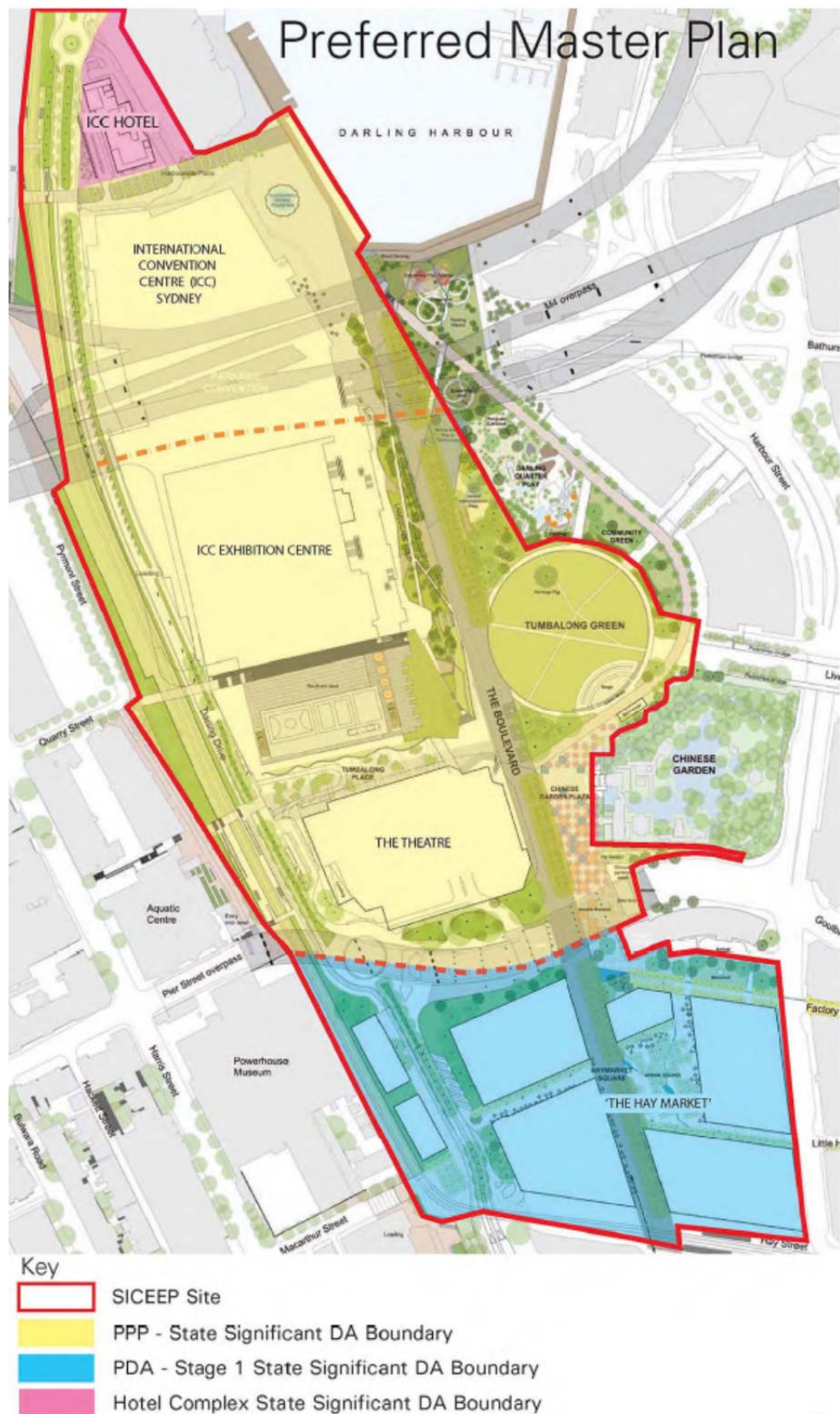
The above will generally be complementary to the proposed hotel. However, the City's submission to the PPP DA recommended that pedestrians be given greater priority in the interface between the buildings by the exclusion of vehicles in the public domain (i.e. in 'Harbourside Place').

## **2.6 Proposed Development**

The SSD DA proposes the construction of a 36 storey hotel development, broken down into the following components:

- Demolition of existing structures
- Tree removal and replanting
- Construction of a hotel tower providing up to 656 keys, including guest and visitor facilities, a restaurant and ballroom
- Allocation of a maximum GFA for hotel floor space and a maximum GFA for visitor facilities and common areas
- Building identification signage zones
- Public domain works around the site.

It is noted that the Proponent is seeking flexibility in terms of the internal layout of the hotel and has suggested that the final arrangements will be subject to a separate DA.



**Figure 5. Proponent's Preferred Master Plan**  
 Source: Proponent PPP DA Application

### 3.0 Built Form and Urban Design

The key built form and urban design issues for the proposal are:

- Square blocky design
- Pedestrian priority, safety and legibility
- Location of the porte-cochere
- Wind impacts at ground level where there is no upper level setback at the podium to the tower
- The size of the tower footprint.

As evident in Figure 1, the design shows little sculptural relief as the tower rises with a standard plan format. Given that an operator is yet to be formally brought into the project, it is recommended that a concept envelope be approved with a requirement that a competition be held for the design of the tower with the input of an operator. The aim of the competition should be to provide for a more site responsive design which is more organic in nature and which softens the angularity of the form when viewed in the Darling Harbour context. Such a competition (not a design alternatives process) should be consistent with the City of Sydney policies and have an equal number of jurors from the consent authority, with a least one juror nominated by the City of Sydney.

#### **Recommendation 1**

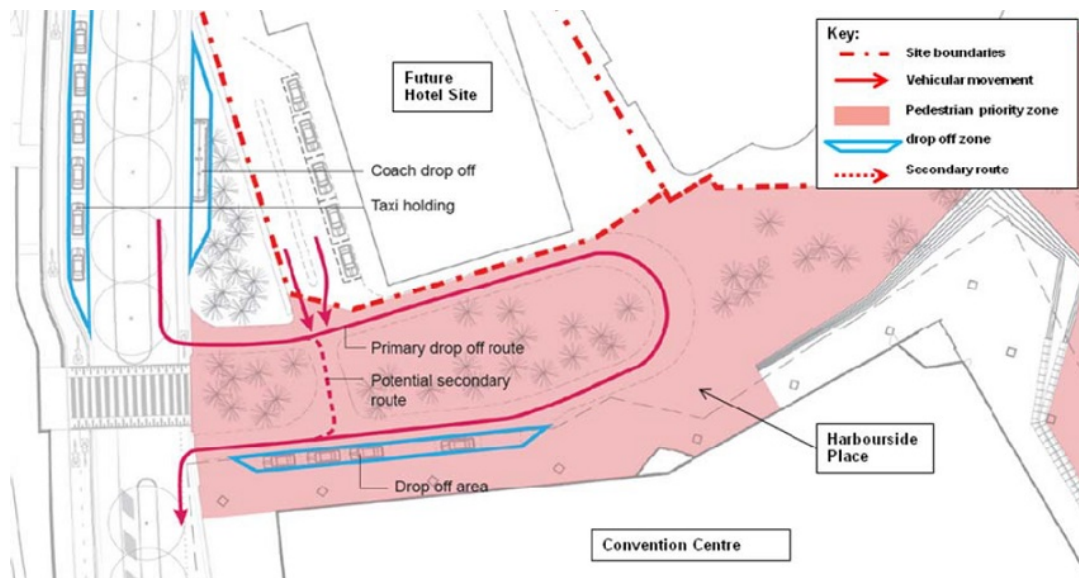
A concept envelope only approval should be given with a requirement that a full competition be held for the design of this important site when an operator is on board so that a more sculptural; landmark design be developed. Any design must not increase overshadowing of Tumbalong Park or the Children's playground in the afternoon.

#### 3.1 Pedestrian amenity

The vehicular circulation around the proposed hotel makes the area a large roundabout. The boundaries of the site are dominated and prioritised by vehicular movements.

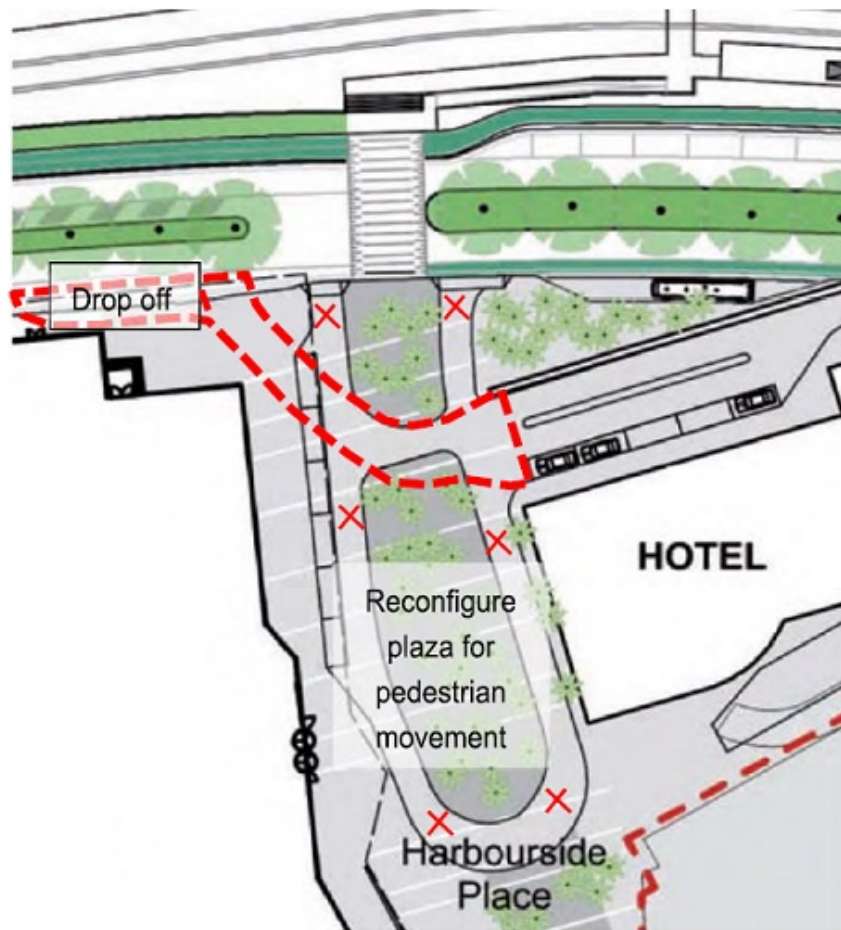
The City's earlier submission to the PPP DA recommended that pedestrians be given greater priority in the interface between the Convention Centre and the proposed hotel by excluding vehicles in the round. However, a vehicle circulation plaza was approved. The proposed hotel relies on the plaza for vehicle drop off and pick up to the proposed porte-cochere.

The City's view is that the Harbourside Place design is unfortunate. Whilst the Convention Centre drop-off may have been approved, the case for increased vehicles from the hotel in what will be a very strong pedestrian connection is not appropriate. This is further reinforced when a porte-cochere accessed from a slip lane off Darling Drive is available.



**Figure 6. Interface between approved Convention Centre and proposed hotel**  
Source: Department of Planning's PPP DA Assessment Report





**Figure 7. Extract from City of Sydney submission on PPP DA showing preferred exclusion of vehicles in 'Harbourside Place'**  
Source: City of Sydney Submission to PPP DA

The proposed vehicle arrangements are inconsistent with the requirements/guidelines of the Infrastructure NSW Urban Design and Public Realm Guidelines Compliance such as:

- *Maintain the pedestrian dominance of Darling Harbour*
- *Support the key pedestrian connections with vehicular access that includes VIP arrival and drop-off zones for red carpet and similar events*
- *Provide places not roads*
- *Build a walkable precinct*

- *The Design must follow the principles to be adopted for walking routes and follow the five C's approach as follows: - connected-convivial-conspicuous-comfortable – convenient etc.*

Pp.48-55 Sydney International Convention, Exhibition and Entertainment Precinct – ICC Hotel

Key issues diminishing the pedestrian amenity are:

- **Porte-cochere** – the proximity of the entry and exit either side of the pedestrian crossing impedes safety and security
- **Shared zone** – the shared way becomes dominated by cars due to the lack of active frontages and is unlikely to be used heavily by pedestrians.

#### **Recommendation 2**

Prioritise pedestrian movements in 'Harbourside Place' by relocating the porte-cochere along Darling Drive and restricting vehicle movements to a slip lane into the site rather than turning facility, as recommended in the City of Sydney submission to the PPP DA.

### **3.2 Wind impacts from tower form**

The proposed single tower reduces the overall bulk and mass of the building. However, at points the tower comes directly to the ground due to the lack of upper level setbacks. This will have wind impacts on the ground as there is no podium to ameliorate down drafts.

#### **Recommendation 3**

Reduce the wind impacts at ground level by setting the tower back from the podium along all edges.

### **3.3 Tower footprint**

The tower footprint is slightly larger than desirable at 1,172.64m<sup>2</sup>. The Sydney Development Control Plan 2012 contains the following extract in relation to floor plates:

*SDCP 2012 5.1.4.2 Residential buildings and serviced apartments (1) For residential buildings and serviced apartments with a height above the 45m:*

*(a) The size of the floor plate above the street frontage height must not exceed 1000m<sup>2</sup>*

p5. s.1-18, Sydney DCP 2012

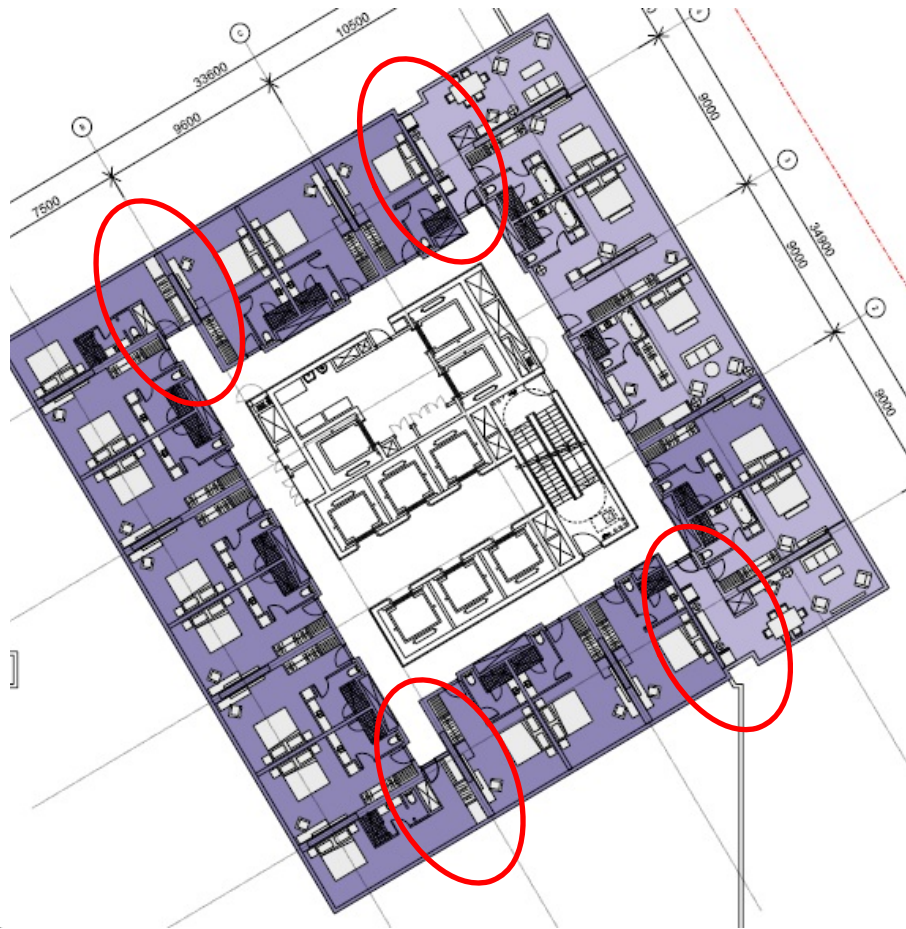
If the footprint of the tower were reduced, the 'slenderness' of the tower can be achieved in less height. This would have flow-on reduction to the overshadowing impacts on the surrounding area, in particular Tumbalong Park in the afternoon in mid-winter.

**Recommendation 4**

Restrict the footprint of the tower to 1,000sq.m floor plates.

### **3.4 Enclosure of internal corridors**

Feedback given to the Proponents in January 2013 included the City desire for the internal hotel corridors to extend out to the building face to allow natural ventilation (and therefore reduce mechanical heating and cooling), natural light, a pleasing internal outlook and greater external articulation. The internal layout is capable of augmentation to open the lobbies to the exterior.



**Figure 8. Internal corridors should extend to the exterior of the building for light and ventilation**  
Source: Proponent SSD Application

#### **Recommendation 5**

Extend the internal corridors of the hotel levels to the edge of the building.



## 4.0 Traffic, Parking, Cycling and Walking

### 4.1 Drop off and pick up

The design and arrangement for the pick-up and drop off of visitors is sub-optimal. The porte-cochere requires vehicles to access the loop road from Darling Drive and instantly veer left into the hotel. The distance between Darling Drive and the hotel drop off is short. Even with wayfinding signage, the design of the drop-off is likely to result in users of both the hotel and the Convention Centre using the porte-cochere or being distracted by the arrangements. There is a lack of intuitive design particularly for first time visitors to the hotel and Convention Centre.

The porte-cochere area is dominated by cars. The existing pedestrian connection to Darling Harbour from the light rail is to be significantly improved by the PPP DA. However, the proposed hotel places additional demands on 'Harbourside Place' and produces additional potential conflicts within the shared zone.

The arrangement for vehicles exiting the porte-cochere is poor. The vehicles exit onto the Harbourside service road which then immediately intersects with the loop road.

#### **Recommendation 6**

In the event that the porte-cochere is not relocated to Darling Drive (as recommended), review the design to make it more functional and user-friendly.

### 4.2 Bicycle parking and end-of-trip facilities

The hotel does not have any proposed cycling facilities for staff. The DA should be amended to ensure compliance with the NSW Planning Guideline for Walking and Cycling or the Sydney Development Control Plan 2012.

The NSW Guidelines require 3 – 5% of rooms to be provided for staff and the same number for visitors. Based on 656 room keys, that would be approximately 39 – 66 spaces.

The Sydney DCP 2012 requires 1 space per 4 staff and 1 per 20 rooms for visitors. Given that staffing numbers are not yet resolved, the NSW rate is appropriate at this stage.

**Recommendation 7**

Bicycle parking in line with requirements of the NSW Planning Guidelines for Walking and Cycling should be provided. In line with the City's Sydney DCP 2012, 33 personal lockers and 2 showers should be provided for staff, with associated changing facilities.

## 5.0 Sustainability Measures

The Sustainability Report is very high level and features soft, non-committal language rather than making commitments and setting definite targets.

The proposed hotel does not seek a NABERS or GBCA rating. The City encourages the Proponents to pursue a NABERS or GBCA rating as this would help address many other sustainability issues within one tool, especially the GBCA custom tool.

The following specific matters are raised for the Department's consideration in relation to the sustainability aspects of the proposal:

- **Climate change** – climate change is not addressed in the body of the Sustainability Report, only a tick in the DGRs table. Heat loads, energy demand and sea level rise matters should be considered.
- **Transport** - the Sustainability Report has good intent, especially links to public transport and the GoGet car share scheme (p7).
- **Energy efficiency** - the Sustainability Report has good technologies listed (p8), though this could extend into innovative ways to influence guest behaviour.
- **Water** - the water minimisation approach in the Sustainability Report is insufficient. Whilst rainwater capture and re-use in a high rise is not viable for broad use like toilet flushing, grey water harvesting and re-use certainly is and should be implemented (p10). Dual reticulation would also future proof the building and be significantly cheaper than retrofitting twin pipes at a later date. Such plumbing could also make use of stormwater harvested from Barangaroo.
- **Stormwater management** - the Sustainability Report does not explicitly address sea level rise or storm surge. These may have been factored into the Hyder modelling, but have not been referred to directly in the DA documents, even though the Darling Harbour area is likely to be affected by sea level rise by 2070.
- **Star ratings** - the Proponents should be able to provide a minimum star rating under the water efficiency labelling scheme for water fixtures and fittings for the hotel, from a best practice perspective this should be a minimum 4 stars.
- **Construction waste** - the aim of 80% of construction waste diverted from land fill is too low and should be at least 90%, if not 95% (p11).

- **Materials** - In terms of portland cement, a reduction is being considered and this is an example of a soft statement which should be a commitment (p11); in terms of steel, materials should be sourced from responsible steel makers where ever possible, but there is no reference of the Steel Stewardship Forum which could assist in facilitating this (p12); in terms of timber, the wording to use certified timbers leaves for interpretation and lower standards and should be tighter (p12).

#### **Recommendation 8**

Update the sustainability aspects of the proposal to strive for a minimum NABERS or GBCA rating and address climate change, water minimisation and material use shortcomings.



## 6.0 Crime Prevention Through Environmental Design

Section 5.10 of the EIS contains mitigation measures based on the CPTED report prepared by Harris Crime Prevention Services and while many points are mentioned, there is lack of detail provided to assess the success or otherwise of the solutions that will be implemented.

In particular there are concerns about the detail of the following issues:

### 6.1 CCTV

While there were a number of recommendations about placement of CCTV in the CPTED report for key areas in and around the hotel (e.g. entrances, exits, lift well, pool and delivery dock) there is no plan of the placement or details on the operation and maintenance. The City would recommend a thorough audit of the property by the Sydney City Police Crime Prevention Officer that would assist with procedures for placement, data storage and access.

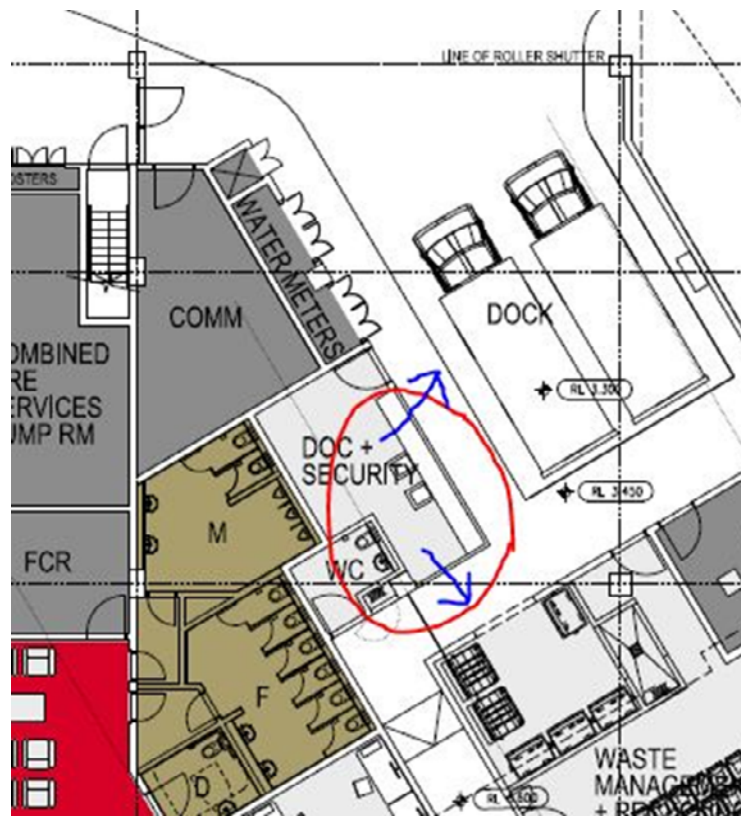
#### **Recommendation 9**

CCTV placement and management should be subjected to an audit prior to construction.

### 6.2 Loading Facilities

The City supports the recommendations for the following;

- the loading dock grill to be automated and have open (transparent) roller doors with warning signage and camera surveillance
- help points to be installed in the goods lift lobbies at all levels
- toughened glass to be incorporated in goods lift doors for eye level surveillance of lift or lobby/level approaches (subject to BCA, fire or other regulations)
- surveillance from the security room into the dock and circulation corridor. This would mean removing/remodelling the cupboard/wall along the dock wall to allow for a surveillance window to be inserted as well as a window or glass panel inserted into the wall along the circulation corridor (see Figure 9).



**Figure 9. Recommended adjustment to security room for surveillance of the loading docks**  
Source: Proponent SSD Application

#### **Recommendation 10**

Detailed design of the loading docks and security room should reinforce surveillance opportunities.

### **6.3 Lighting and Signage**

Many issues were raised throughout the CPTED report regarding specific areas that require targeted lighting and signage strategies. Although the mitigation measures in the EIS mention lighting, there are no specific and detailed solutions provided. It is noted that lighting levels would need to be considered carefully when planning the effectiveness and placement of CCTV cameras.

#### **Recommendation 11**

Detailed design of lighting, signage and CCTV at areas of concern identified in the DA to work in unison when being laid out.

ENDS