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17 September 2018

Department of Planning and Environment Attn: Director – Key Site Assessments GPO Box 39 SYDNEY NSW 2001

Attention: Planner, Mr Matthew Rosel

## MP08\_0098 MOD 13 – Construction of a New Hotel and Residential Tower and Alterations to Existing Building – Star City Casino Site

Dear Director,

The National Trust of Australia (NSW) lodges its strong objection to the Section 75W modification of the project approval for the Star City Casino, Pyrmont, particularly the construction of a 237m tower including podium and basement to provide for 220 hotel rooms, 204 residential apartments, 204 basement car parking spaces and an overall increase in gross floor area of 48,840 m2 (to 189,040 m2).

In the Trust's view, a proposal for a 237 metre tower cannot possibly be regarded as a modification to existing project approvals for Pyrmont's Star City Casino. That such a massive building, the first of its scale in Pyrmont could be dealt with by the planning system in the manner currently proposed is totally inappropriate. An approval for the proposal would set a precedent for massive building height increases in this suburb with little regard for heritage impacts, particularly on the broader Sydney Harbour landscapes and view lines.

There are also the broader concerns such as provision of adequate transport links and overshadowing. It is argued in the Environment Assessment Report and Heritage Impact Statement that overshadowing is minimised by the proposed tower design. However, there is no consideration of the likely cumulative impact of overshadowing that would flow on from a series of high-rise developments that would seek the precedent of an approval for this tower as a "green-light" for massive height increases throughout Pyrmont.

Sydney Harbour is a world-renowned landscape currently defined by its bush land foreshores and bays and the Sydney Harbour Bridge and the Sydney Opera House. Should Sydney and its Harbour be identified in the future by its massive "twin" Casino buildings?

If the proponent does proceed with this development proposal, then the National Trust calls for the lodgement of an entirely new Development Application with a considerably longer period of public exhibition and provision for community comment.

Yours sincerely,

Graham Quint Director, Conservation