

The Secretary  
NSW Department of Planning, Industry and Environment  
4 Parramatta Square  
12 Darcy Street  
Parramatta NSW 2150

By Email: [james.groundwater@planning.nsw.gov.au](mailto:james.groundwater@planning.nsw.gov.au)

**Submission: SSD 10376 Sydney Metro Pitt Street (South) Over Station Development – Stage 2 and SSD 8876 MOD 2**

This submission should be taken as an objection to both SSD-10376 and the modification SSD-8876 MOD 2.

I strongly object to the development application in its current form. It is a serious overdevelopment that does not comply with planning controls and drastically reduces the amenity in my building.

The overshadowing effect of the proposed development on the Princeton building is severe. I understand it is non-compliant with the Apartment Design Guide and according to the applicant's own solar access reports will cause 48 apartments in Princeton to lose the required amount of sun exposure. This in itself should be grounds for the application to be rejected. Can you imagine the huge effects this will have on 48 families? Mental health is also a very important human factor which needs to be taken into account when removing a person's access to natural light, heat, view and privacy.

The applicant has ignored the requirement to comply with numerous planning controls and the requirements of the stage 1 consent. These are not guidelines that can be skirted around as the applicant suggests. Fundamental metrics cannot be changed as the applicant has attempted to do with solar access requirements under the ADG.

In addition to overshadowing Princeton and causing a massive loss of solar access I understand the proposed development will add additional overshadowing to Hyde Park in the vicinity of the ANZAC memorial. I do not understand how it can even be allowed to propose this. The proposal should be reduced to remove any additional overshadowing of Hyde Park which is a precious inner city open space for residents and tourists. Again this raises mental health issues and access to light in the public domain at a time when this is of utmost importance.

The applicant clearly understands and acknowledges that they require to comply with separation requirements but has simply elected not to do so while falsely alluding that Princeton is a non-complying development despite being approved from a planning perspective and built 20 years before the separation requirements came into force. I understand the minimum separation should be in the region of 24m above 9 storeys between habitable rooms. The applicant has proposed 12 m above 9 storeys which is woefully inadequate. Also on lower levels there is 0 separation which I understand is directly adjacent to apartments on the northern side of Princeton and our communal areas including the bbq area, outdoor recreational area and gym. The applicant proposes that these lower levels will house plant and equipment therefore we will have heavy machinery operating immediately next to families' homes, communal areas and cooking areas. This is wrong on a number of levels and again raises mental health issues arising from loss of amenity, acoustic impacts and vibrations. Can you imagine living next to floors of plant and equipment servicing 234 apartments? I find this proposition quite disgraceful. Inadequate separation combined with the excessive height of the proposed envelope will mean next to no privacy, complete overshadowing and loss of view to many apartments in Princeton.

The applicant has also failed to include sufficient privacy analysis in their proposal. Privacy is a huge factor for residents of Princeton which is a wholly residential building with northern facing

windows looking into main living areas and bedrooms. The applicant's proposed solution here is placing louvres on only the bedroom windows, completely ignoring living areas which will face Princeton apartments.

Heritage considerations have been simplified and dealt with insufficiently. The proposed envelope surrounds the beautiful Edinburgh Castle Hotel building on two sides and looms over it dwarfing any heritage impact it once had. This is another example of inconsiderate planning. The only attempt the applicant appears to have made to address heritage concerns is copying the brick colour of Edinburgh Castle Hotel. This is possibly the worst outcome as the colour in a new building will immediately appear dated. The design in general appears to have copied a prison cell block with thick vertical bars running up the entire height of the building and metallic vertical balustrades blocking the already inadequate windows further blocking access to natural light. Not only will the new residents feel like they are in forced confinement with inadequate natural light (which itself is non-compliant with ADG) but they will appear as such from the outside looking in from the proposed design, and residents in Princeton will be faced with a view of vertical concrete and metallic bars right outside their windows. The applicant should be encouraging the flow of natural light as with modern developments in Sydney not restricting and blocking it.

Sustainability seems to be championed by the applicant but only at a surface level interpretation. No proper consideration has been made of the

If the application is approved Century Tower will lose its St. Mary's Cathedral views which the applicant was specifically directed to protect in the conditions of stage 1 consent. Also the view analysis conveniently adopts positioning at Princeton which does not show the complete loss of Sydney Harbour water views to the north from north facing windows in living rooms and bedrooms of all north facing apartments at Princeton. The applicant makes a flippant comment about how important the Tenacity test is but somehow irrelevant for this application as stage 1 concept has already been approved notwithstanding the fact that this test was not adopted at stage 1. To completely remove 2 iconic views from neighbouring developments would surely be of vital importance when adopting the Tenacity test.

Please consider my objection to the development application on the grounds mentioned above. Planning regulations and requirements should be mandatory for all especially considering the state significance of the development and the massive impact this will have to the detriment of our building if approved. I was shocked to discover that the Sydney Metro's own Design Quality Guidelines that were meant to apply to all over station developments were blatantly ignored. Separation limits, solar access effects, overshadowing limits, heritage and privacy concerns should be addressed adequately by the applicant before any approval is given. We need a sensible approach to inner city planning to safeguard our beautiful city.

The modification to the stage 1 envelope represents further non-compliance with planning controls due to reduced separation, loss of solar access and views. It should not be necessary to expand a development beyond the approved envelope for architectural embellishments. I am not aware of any accepted planning principle supporting the notion that only the core building structure needs to exist within an approval envelope with any design features able to protrude outside of the envelope. The entire proposal including the modification application highlights the inherent unsuitability of the site for a development of this nature. The build to rent model is untested in Sydney and the proposal to adopt this in a state significant development is ill-informed.

I would also like to add the difficulty of lodging this submission through the available methods and required some assistance to do so. I was faced with an email verification process which didn't work, contact form errors and errors in dates published on the planning website, not to mention the timing of the exhibition period being the busiest time in the year for many people. It was not

an easy experience and I fear that some objections may be lost in the process. I did not experience the same issues at stage 1 of the development application.

Please consider my objection on the grounds mentioned above. If an independent panel was to assess this application this would provide some comfort that the application would be assessed against established planning requirements. I support growth and sustainable development in this part of the city and would welcome the opportunity to review a sensible and well-considered development application in line with planning requirements.