

5 November 2015

File No: R/2015/8/B
Our Ref: 2015/579484

Cameron Sargent
Team Leader, Key Site Assessments
NSW Planning and Environment
22-33 Bridge Street,
Sydney NSW 2000

Attention: Matthew Rosel, Senior Planner
matthew.rosel@planning.nsw.gov.au

Dear Matthew,

RE: Barangaroo South – Crown Sydney Hotel Resort (SSD 6957)
City of Sydney response to Applicant's Response to Submissions

I write in relation to the Department's letter dated 22 October 2015 inviting the City to review Crown Sydney Property Pty Ltd's Response to Submissions (RtS) for the proposed State Significant Development Application (SSD DA) for Crown Sydney Hotel and Resort in Barangaroo South.

This letter is to be read in conjunction with our earlier objection to the SSD DA.

The SSD DA remains under assessment alongside an undetermined modification to the existing Barangaroo Concept Plan and amendments to State Environmental Planning Policies to overcome land use prohibition, current height restrictions and expand the boundaries of Barangaroo.

The City remains of the view that Concept Plan MOD 8 and the Crown Resort SSD will result in poor outcomes and are not in the public interest. Locating the development on land intended for a waterfront parkland and world-class harbour cove is a significant unwarranted departure from the existing approval framework and state legislation.

Public faith in the planning system delivering the outcomes expected from the existing law and approved Concept Plan would be maintained, to some degree despite the numerous amendments already made, if the hotel and casino tower were appropriately relocated to the zoned development zone.

The City's objection to the SSD DA remains. The objection would not be lifted in the event that MOD 8 to the Concept Plan were to be approved by the Planning Assessment Commission (PAC). The issues raised in the City's earlier submission on the SSD DA, including but not limited to design issues, affordable housing supply, housing diversity, traffic issues, etc, are exclusive.

The Applicant's RtS is dismissive and asks the consent authority to determine the SSD as lodged. No changes to the SSD arise from the public exhibition process. None of the City's grounds for submission are satisfied.

The City sustains an objection to SSD DA and calls for the application to be considered by the PAC to meet a public interest test and the considerations under the Planning Act and the SEARs.

The City's key grounds of objection remain (but are not limited to):

- (a) Reduction in the width and public amenity quality of the waterfront promenade through transgression of the continuous parkland frontage;
- (b) Northern extent of the podium protrudes into a view corridor along Gas Lane to and from Hickson Road to the harbour. The podium should be rationalised;
- (c) Car parking for the casino / hotel components and residential components are excessive and counter to sound urban planning and concept plan principles and commitments to date. There is no basis in applying parking based on an entertainment complex built decades ago in Melbourne, which itself was based on car parking rates not reflecting the attributes of the Barangaroo site. The residential parking rates are more than twice than apply directly across Hickson Road. It is the polar opposite of sound planning to provide parking to a certain target demographic that apparently, and against the tide of less car dependence generally, "*require* more than one car". The quantum of parking is made more anomalous given the recent commitment to a metro heavy rail serving the site;
- (d) Affordable and key worker housing contribution or works in kind is not provided as required by the PDA. The narrow dwelling mix of 2-5 bedroom apartments is not in accordance with the requirements to provide a genuine mix including studios and 1-bedroom apartments applied to development in the Sydney City LGA. A minimum of 10%, and preferably 20% of the residential gross floor area should be provided as affordable and key worker housing. Introducing new apartments into Barangaroo South without a contribution to affordable housing is not consistent with the existing land agreement and not in the public interest;
- (e) Ineffective wind mitigation has been designed into the base of the tower at its northern end to reduce reliance upon enclosing structures and landscaping at the ground level along the harbour waterfront;
- (f) Signage and branding on the podium and tower should be integrated with the quality and form of the building. Building identification signage is excessive as signage is placed around every pedestrian entry to the building when visitors will already have had exposure to other signage prior to that point; and
- (g) The Visual Impact Assessment does not include an analysis from the view corridor along the waterfront promenade from the south which is the key impact of the inappropriate siting. This is necessary for the public's understanding of the full range of environmental impacts arising from the development.

Should you wish to speak with a Council officer about the above, please contact Russell Hand, Senior Planner, on 9265 7321 or at rhand@cityofsydney.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'GJahn', written in a cursive style.

Graham Jahn AM
Director
City Planning | Development | Transport