

**SSD 5397 - IMAX - Entertainment, retail and commercial development**

**Submission by:**

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## Summary

We oppose the application on the grounds of:

- Conflict with the City of Sydney's 2030 Vision for the Western Distributor
- Visual impact on the existing public domain
- Visual impact on the future public domain
- Inconsistency with the "Valley Floor" concept and with other developments at Darling Harbour.

## 1. Factual errors in statements by the proponent

Proponent statement	Location of statement	Actual fact
Fraser's Central Park is an example of a change in character from the lower-rise "valley" approach to Darling Harbour	EIS page 36	Fraser's Central Park is not located at Darling Harbour
Barangaroo is an example of a change in character from the lower-rise "valley" approach to Darling Harbour	EIS page 36	It is true that Barangaroo does not observe a uniform reduction in building heights from the Clarence St ridge down to Darling Harbour. However, Barangaroo does not place high-rise buildings immediately next to the water. The buildings closest to the water at Barangaroo are low-rise residential.
"The proposal is in scale with the new vision for, and changing character of, the Darling Harbour precinct particularly in light of the nearby SICEEP redevelopment. "	EIS page 36	The SICEEP redevelopment does not place 20-story buildings next to the water. The Convention Centre and Exhibition Centre are low-rise. The new hotel is located behind the Harbourside Shopping Centre, not directly adjacent to Cockle Bay.
"the proposal does not block any significant views to iconic landmarks or water from the public domain"	EIS page 38	The proposal blocks significant views to most of the CBD and to Cockle Bay from the existing public domain at the Children's Playground and Tumbalong Park, and from the future public domain at The Theatre and The Boulevard in the SICEEP project.
"the proposal responds to the view corridors"	EIS page 38	The proposal does not mention or consider the future major view corridor along The Boulevard in the SICEEP project. Views from the Boulevard and the Theatre to the CBD and to the eastern side of Cockle Bay are blocked by the proposal.

## 2. Conflict with the City of Sydney's 2030 Vision for the Western Distributor

The City of Sydney envisages lowering the Western Distributor to ground level or below and then covering it (City of Sydney, Sustainable Sydney 2030 - The Vision, pages 15, 19, 47 and 135).

It is premature to approve any building inside the Western Distributor lanes until those works have been fully specified. The location and design of the proposed Ribbon building are currently restricted by the presence of the elevated freeway. To rush into a development which treats the Western Distributor as being an immovable object and ignores the City of Sydney's 2030 Vision would be a fundamental planning error resulting in a sub-optimal outcome.

### **3. Visual Impact**

#### **3. 1. Visual impact on the existing public domain**

In the EIS (page 38) the proponent states that "the proposal does not block any significant views to iconic landmarks or water from the public domain". Actually the proposal blocks significant views to most of the CBD and to Cockle Bay from the existing public domain at the Children's Playground and Tumbalong Park.

The assessment concludes that the maximum visual impact is one classification less than devastating. The assessment considers that this is somehow a positive outcome (Visual Impact statement, Page 7).

The assessment states that the severe impacts can be made acceptable by unspecified cosmetic mitigation. It does not explain how cosmetic works can somehow transform a severe impact into an acceptable impact.

#### **2. 2. Visual impact on the future public domain**

The assessment fails to consider the visual impact of The Ribbon on the new public domain which is proposed to be created in the SICEEP project. In particular, the Theatre and the Boulevard axis are public domains which will both have high levels of visitation. Both are located South of The Ribbon, and they are impacted at least as severely as Tumbalong Park and the Children's Playground. Views from the Boulevard and the Theatre to the CBD and to the eastern side of Cockle Bay are blocked by the proposal. The visual impact is devastating and not amenable to mitigation by any means.

#### **3. Inconsistency with the "Valley Floor" concept and with other developments at Darling Harbour**

The proponent claims that by sloping down from East to West, The Ribbon is abiding by the Valley Floor concept. But the IMAX site is not located on the Eastern side of Cockle Bay. It is located on the Southern side of Cockle Bay, which is inside the Valley Floor. In order to help define the Valley Floor, there should be no tall building of any kind inside the Valley Floor.

Considering only the visual impact, any slope on a tall building located to the South of Cockle Bay should be downwards from South to North. This is clearly not possible on the narrow IMAX site.

Because it is not possible to abide by the Valley Floor concept on the existing IMAX site, that site should not be redeveloped until the elevated freeway has been removed or covered over, thereby allowing greater freedom in the design.

The proponent claims that the proposed development is in keeping with developments at Barangaroo and in the SICEEP project. This is mistaken on both counts:

- it is true that Barangaroo does not observe a uniform reduction in building heights from the Clarence St ridge down to Darling Harbour. However, Barangaroo does not place high-rise buildings immediately next to the water. The buildings closest to the water at Barangaroo are low-rise residential.
- the SICEEP redevelopment does not place 20-story buildings next to the water. The Convention Centre and Exhibition Centre are low-rise. The new high-rise hotel is located behind the low-rise Harbourside Shopping Centre, not directly adjacent to Cockle Bay.