

**State Significant Development
The Sandstone Precinct
23-33 & 35-39 Bridge Street, Sydney
Tourist and Visitor Accommodation**

SUBMISSION BY JOHN FREEMAN ON STAGE 2 APPLICATION

The Astor
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For 25 years I have lived nearby the “Sandstone Precinct”. Most Stage 2 details are acceptable, indeed commendable. However, I object to some and to the shortcomings in consulting local owners. I request consideration of my objections in conjunction with my earlier objection to the s94 modification application.

CONSULTATION

In my Stage 1 submission, I complained as follows:

The exhibition documents do not comply with the SEARs. In particular, there has been no consultation with community groups and affected landowners.....

The applicant does not list residential landowners as “key stakeholders”. The SEARs state that there must be consultation with landowners and does not distinguish between residential and non-residential landowners.

The Consultation Report does not list the residential owners in Booth House, Bridgeport and The Astor as stakeholders. It lists The Astor Pty Ltd, but not the owners of the individual 52 units in the building. It states that:

Astor received a letterbox dropped invitation to the community information sessions but did not attend.

As a former director of The Astor Pty Ltd, I know that the company:

- Keeps meticulous records of all communications,
- Has an office at The Astor open during normal business hours.
- Has directors who take great interest in all nearby development proposals.

The current Chair of The Astor assures me that the company received no communication of any kind from the applicant or its consultants. Furthermore, the SEARs require the applicant to consult, not merely organise a “letterbox dropped invitation to the community information sessions”.

Notwithstanding my complaint at Stage 1, the applicant has still not consulted me. “Consultation” does not mean “advertise”; it does not mean a leaflet drop. It means posting a letter, visiting an office, or using the telephone or email until there is engagement with the owner. As a consequence of the applicant’s failure to comply with the SEARs, I have to write my objections without having seen the interiors of the two buildings or hearing explanations by the applicant’s consultants or being able to discuss my concerns with the applicant.

The Stage 2 application contains several changes to the Stage 1 application of interest to local resident owners:

- An increase in the height of the Education Department building.
- The inclusion of an external bar on Farrer Place.
- Up-lighting of facades.

There is no evidence that the applicant disclosed any of these significant changes to residents attending the information sessions.

EXTERNAL UPLIGHTING

External up-lighting would not be permissible under the Sydney Development Control Plan, which states:

External lighting must not disturb the amenity of residents in the locality.

The Plan does not apply to state-significant development. However, is the external up-lighting of state-significance? I request that external up-lighting be left for Council to assess under a separate development application. Some up-lighting is acceptable. However, the proposed up-lighting goes well beyond the current up-lighting of the Secretary’s Building on Bridge Street.

Possible damage to significant fabric

The light fittings would be mounted on the sandstone façade. I request that the Heritage Office be consulted as to (a) the acceptability of these mountings and (b) the arrangements for supervising the installation.

Impacts on Bridgeport and Booth House

There is no mention of consultation with the owners of Bridgeport and Booth House, both directly opposite the Education Department Building, regarding up-lighting. The EIS considers the owners of 50 Bridge Street (AMP) to be stakeholders, but not those of Bridgeport and Booth House, which are much closer and would be directly opposite the Education Building up-lighting.

Impacts on the Tracey Emin sculptures

Council has approved the installation of bird sculptures on the façades of the Education and Lands buildings. The birds are likely to be in place before the light fittings. It may be possible to design the up-lights so that they do not pick up the birds. Alternatively, why not remove the birds and hand them back to Council? They don’t belong on these heritage façades.

Impacts on other heritage items

Any external lighting should be consistent with the lighting of nearby heritage items. The lighting proposal does not consider the impacts on the Bridge Street Special Character Area. The Chief Secretary’s Building has some appropriate but limited lighting. The Macquarie Obelisk opposite the Lands Building does not.

PROPOSED BAR ON FARRER PLACE

The Stage 2 application proposes a bar in the south-western corner, fronting the corner of Bent Street, Farrer Place and Loftus Street. I object.

Not a permissible use

The Stage 1 consent only covers tourism accommodation and ancillary uses. The bar on Farrer Place is not an ancillary use, because there is no entry from the tourist accommodation. It would operate independently. It is a separate use, not permissible under the Stage 1 consent.

Of course, the new facilities for the Lands Department Building and the Education Department Building will be of value to nearby residents. But even without the external bar on Farrer Place, there will still be two internal bars in the Education Department Building accessible to residents.

Unnecessary removal of original fabric

The proposed direct access from Farrer Place to a bar through what are now window openings is an unacceptable alteration to a building of exceptional heritage significance. It would change the pattern of entrances to the building and require the removal of original external fabric. The Statement of Heritage Impact (SHI) is vague about this removal:

The existing Lower Ground Level windows and grilles, located in the south western splayed corner of the building on this level, are proposed to be carefully altered to provide public access to a bar to be located in the south western corner. Any adverse heritage impacts are outweighed by the increased public access and are mitigated by the careful, high quality design approach.

The interventions required to adapt these former offices and back-of-house zones will have impacts on the physical fabric. In the context of the approved change of use it is considered, that the impacts are appropriate and that the resulting publicly accessible facilities will present as an elegant, high quality destination that celebrates its heritage significance.

The SHI overlooks that the removal of original fabric for the purposes of the bar is unnecessary for the adaptive re-use of the Education Building as a hotel. It misleadingly describes the removal of the grilles as “carefully altered” and does not say how much original fabric would be removed.

According to the SEARs:

The EIS shall include a Heritage Impact Assessment which:

- Describes.....
- Assesses....
- Describes the potential impact of the proposal (including the adaptive reuse, fit out, operation and National Construction Code compliance) on any heritage item, measures to mitigate any impacts and reasons why a more sympathetic solution is not viable.....

The SHI does not give any reason why a more sympathetic solution than altering the windows and removing the grilles is not viable (eg using the area for back-of-the-house functions and not altering the windows).

Activation

The SHI states that the removal of original fabric to construct the bar is justifiable because the activation benefits are greater than the heritage impacts.

The Sydney Development Control Plan defines activation as follows:

Active Frontage means street frontages where there is an active visual engagement between those in the street and those on the ground floors of buildings. Frequent building entries that face and open towards the street, transparent street frontages, quality materials and refined details, and mixed land uses will make streets more diverse and attractive for pedestrians and increase the perception of safety and encourage higher levels of pedestrian activity.

Active frontages are fundamentally about “active visual engagement”, not levels of pedestrian activity. Increasing pedestrian flows along a blank, windowless concrete wall is not activation. Activation of the corner of the Education Department Building is achievable simply by replacing the opaque glass with clear glass, such that pedestrians can see through the glass.

Signage

The application documents make no mention of any signage for the bar. Exterior signage for the bar would further degrade the heritage values of the building.

Impacts of late night trading on residents

Two residential buildings are close by: Bridgeport and The Astor. In addition, there is development consent for three large new apartment buildings nearby on Loftus Street and Young Street. Several premises in this area have late-night trading consents. Additionally, there is a late night trading application for 400-patrons on the site adjoining the Education building. All these venues promise exemplary management, but when we suffer from drunk hoons we can't tell where they came from. The area is at risk of becoming a late-night entertainment area.

CONSTRUCTION IMPACTS

The EIS has assessed construction impacts in accordance with SEARs except for details of vehicle routes and numbers, and cumulative construction impacts.

The Consultation Report states that:

- The project team reassured the residents that the construction approach will be sensitive and ‘surgical’ given the heritage nature of the buildings and that this will have flow on effects in terms of noise and construction impacts. It was suggested that the construction will take 2-3 years to complete
- The project team explained that the majority of the work would be to the interior of the buildings.

The project team misled the residents. The SEARs require the applicant to consult landowners, not conduct a public relations exercise. The proposed works include the demolition of the roofs of both buildings and the erection of large cranes; these are not interior works. The proposed works also include substantial excavation that will cause vibration; the removal of excavation and demolition material will generate substantial dust and traffic. Notwithstanding the reassurances that the project team gave residents, it was sufficiently concerned about construction impacts to discuss them with AMP Capital, whose site is further away than the apartments in Booth House and Bridgeport.

Owners of apartments at The Astor are concerned that several major construction projects in the north of the CBD with long construction periods will be taking place simultaneously:

1. 71-79 Macquarie St
2. AMP Loftus/Young/Phillip
3. 1 Alfred St
4. Sandstone Precinct
5. Light Rail terminus

6. 55 Hunter St (demolition starts 2017 for construction of Metro station)
7. 33 Bligh St (currently under construction)
8. 182 George St and 33-35 Pitt St.

Other projects are in prospect (eg the Intercontinental Hotel extension, the Government's Circular Quay Wharves Upgrade) but with timing uncertain. The main impacts on The Astor from the Sandstone Precinct and the other projects relate to (a) construction traffic, (b) dust, and (c) a proliferation of work zones severely limiting on-street parking for service vehicles in the north of the CBD. The Government's Sydney City Centre Capacity Improvement Project and Sydney City Centre Bus Infrastructure Project have greatly reduced on-street parking for service vehicles. The site of The Astor has been in residential use since before the age of motor vehicles, and there has never on-site vehicle access. As a heritage building, the owners cannot overcome the lack of service vehicle access by redevelopment.

As a minimum, the Government and the Council should investigate six possible mitigation measures:

- The designation of routes for construction vehicles that has regard to their total numbers and sensitive buildings.
- The curtailment of street events (which serve to restrict vehicular access to The Astor and other buildings on several days a year).
- Developers requesting more than one work zone should be required to stage the work such that they only need one work zone at a time.
- Special construction hours to spread the traffic burden and speed construction.
- Temporary curtailment of some clearways so as to allow more on-street parking opportunities to compensate for those lost to work zones.
- Reduce the on-street areas that the Government has reserved for bus layovers.

With regard to construction hours, Government projects enjoy longer construction hours and work zone priorities, which is anomalous in the context of the north of the CBD; there should be a common regulatory regime for all construction projects. The Government cannot continue approving major construction projects as "state significant development", reserving long sections of streets for bus layovers and then leaving the City Council to sort out how it can possibly provide the work zones necessary to complete the projects.