

InterContinental Hotel and Transport House, Sydney – Concept Development Application (Staged Development) for Alterations and Additions (SSD 7693)

Submission by John Freeman

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I have lived nearby the site since 1991. I have several concerns about the proposals.

Objective of the proposal

In my opinion, the proposed works are not consistent with their stated objective, though its meaning is unclear:

The objective of the proposed development is to reinvigorate the existing InterContinental Hotel to create an integrated and vibrant luxury hotel commensurate with a global city and an iconic location that is recognised on the world stage.

The phrase “an iconic location that is recognised on the world stage” is puzzling. According to Wiktionary, an icon is:

An image, symbol, picture, or other representation usually as an object of religious devotion.

The site has many qualities, but the application documents mention no association with religious devotion or any other representation qualities. Who on the “world stage” is recognising which street adjoining the site?

The most widely-known street adjoining the site is Macquarie Street. Macquarie Street is a frequently-used metonym for the NSW government, and the site’s former government buildings are of great heritage value. It is important that the development interpret this heritage, but the proposals do not do so.

The buildings may well need refurbishment. However, the application proposes a ten percent increase in floor space, and there is little explanation of why such a big increase is necessary to achieve the stated objective. A high-ranking hotel may desire a column-free function space. But how large? The proposal is for a 916m² space, far larger than the function spaces of other high-ranking hotels in the city. For example, following a renovation this year, the Four Seasons Hotel claims to have “Sydney’s iconic pillarless Grand Ballroom”; it is just 683m² in size.

The city already has plenty of under-used ballrooms. It is true that Sydney has not hosted the Pan-Pacific Grand Prix Dance Championship since the memorable event that Baz Luhrmann portrayed in his 1992 film *Strictly Ballroom*, but the application documents make no mention of using the grand ballroom for the event, or for anything else on the dance calendar. There is also no mention of a hardwood floor suitable for dancing.

Instead of dancing, the application documents give an artist's impression of using the grand ballroom for a day-time conference. The suspicion is that the use of the term "grand ballroom" is simply to justify a large footprint for the extension, extending to Phillip Street and to the northern boundary of the site without any setbacks.

Design competition

The applicant requests exemption from the requirement of the Local Environmental Plan (LEP) for a design competition. However, if the applicant is right in saying that the development is in "an iconic location that is recognised on the world stage" then it is all-the-more important that there be a design competition in accordance with the LEP.

Consultation

The SEARS require consultation with community groups. There are several residential buildings near the site. The EIS does not mention any consultation with any of the relevant strata committees or the board of The Astor. At nearby sites, four large new apartment buildings are either at site preparation stage or have development approval. As nearby residents are likely to use the InterContinental for various purposes (including as accommodation for their visitors), it is surprising that the applicant is indifferent to their views.

Structural load of the ballroom

The EIS is too vague regarding the need for additional structural supports within Transport House:

The structural load which the new ballroom addition will place on Transport House has been the subject of initial review by Arup, who have had access to the original structural drawings. The initial design analysis has indicated that the existing structure appears to be able to support the proposed addition without significant additional strengthening.

In *A.P.T. Peddle Thorp & Walker Pty Ltd v. Sydney City Council* (NSWLEC 186 (4 December 1997)), His Honour Justice Bignold stated:

I should also mention one other matter concerning the proposed tower much discussed in the evidence, namely its impact on the significant interior sections of Transport House, especially the Registration Hall, by virtue of its necessary structural penetrations to provide foundations and support for the tower. This potentially adverse impact is far more problematic than the external adverse impact of the tower and I would prefer to not express a final opinion on this matter other than to say it is the one important demerit in the otherwise commendable proposal to refurbish and adaptively reuse the retained elements of Transport House.

It is essential that the applicant provide definite information on the necessity for structural penetrations to Transport House to provide foundations and support for the ballroom.

Setbacks

The EIS does not adequately discuss setbacks. There is no mention of the DCP 10m setback on Bridge Street, yet the drawings propose a mere 4m setback. The mechanical plant will be visually prominent and detract from the heritage façade below (see picture below).



The relocation of mechanical plan is a wholly inadequate justification for non-compliance with the Bridge Street DCP setback.

The DCP requires a 10.0m setback from the Phillip Street wall yet the proposed grand ballroom addition would extend to the street frontage. The application documents consider only the impacts of this on heritage values. The DCP explains that the purpose of setbacks is to protect the quality of the public domain, and the application does not assess the impacts on the public domain of Phillip Street from having no setback. At the very least a zero setback would reduce sunlight access to the pedestrian pavements.

The EIS proposes no setback from the northern boundary of the site. In *A.P.T. Peddle Thorp & Walker Pty Ltd v. Sydney City Council* (NSWLEC 186 (4 December 1997)), His Honour Justice Bignold stated:

To the extent that cl 7(3) warrants consideration of the impact of the tower proposal on the adjoining heritage buildings to the north of Transport House I would find, preferring again the evidence adduced by the Council, that there would be an adverse impact on those heritage buildings, by virtue of the elimination of the present transition in scale between the low rise Justice and Police Museum buildings, through the mid-rise Transport House to the high-rise Inter-Continental Hotel and its replacement by the high-rise tower (set back only 3 metres from the northern boundary) which would visually overwhelm the low-rise heritage buildings.

So His Honour Justice Bignold considered that a 3m setback was insufficient, but the applicant is proposing no setback whatsoever. Although the height of the proposed northern façade is lower than that which Justice Bignold considered, it is much wider.

The SEARs call for the EIS to consider the setbacks of the proposal within the context of the locality and heritage values, yet it has not done so at all in respect of the northern and southern setbacks, and has only provided a partial consideration in respect of the Phillip Street setback.

Façade replacement

The applicant proposes to replace the concrete panels and aluminium windows with “a new modern façade comprising a high performance glazed curtain wall system”. As a nearby resident, I am concerned about (a) the construction noise associated with this work and (b) the impact on views of the heritage facades. That the new façade will be “modern” is no justification and glazed curtain wall systems are now commonplace in the city centre.

Traffic and parking assessment

There are several errors in the traffic and parking assessment. The assessment ignores the AMP Capital development on the adjoining site across Phillip Street which has been approved and construction of which commences early next year. That development will result in significant additional traffic and parking demand, the details of which will be familiar to Arup as Arup prepared the assessments for AMP Capital. The SEARs require consideration of cumulative impacts, and this is missing from the traffic and parking assessment.

With respect to additional parking arising from evening events, the assessment is over-optimistic about the availability of parking. It states:

....a number of basement car parks primarily used by commercial workers during the day will likely to be available for event parkers on weekday evenings and weekends when demand generated by commercial uses is low.

However, the public parking stations at Hudson House and Governor Phillip Tower close at 9pm. Although the Hudson House station is open to the public, many of the spaces are in fact privately owned, and the effective supply for events anyway small.

Moreover, evening demand arises also from the Opera House and other Circular Quay venues. These venues include an ever-increasing number of restaurants offering evening dining.

It follows from these comments that a 916m² ballroom is too large for the local parking capacity.

The problem that residents face is that year by year our visitors and service providers find it harder and harder to find a parking space. There simply is not enough space in public stations. The error in planning has been to allow too much private parking while ignoring the need for visitor parking.

Drop-off /Pick-up on Macquarie Street

According to the Traffic and Transport Assessment:

There is a kerb extension extending north from Bridge Street which provides pedestrian amenity and gives presence to the buildings main portico. It is suggested that this kerb extension should be reviewed as part of the streetscape planning and if possible allow for extension of the bus zone.



That the pavement extension “provides pedestrian amenity and gives presence to the buildings main portico” should surely be enough justification for its retention. Yet the Traffic and Transport Assessment suggestion ignores the fact that the DA drawings propose to use the pavement in front of the portico for outdoor dining!

Bridge Street terrace area

There are no proposals for the Bridge Street terrace area. This area was the subject of a development application in 2013 (D/2013/393). One of the conditions of consent was as follows:

The following design details are to be incorporated in the Construction Certificate drawings prior to the Construction Certificate for the project being issued:

- (a) Confirmation of maintaining the existing outdoor paving and plantings.
- (b) Design changes to the outdoor area in a practical location to provide disability access to part of the outdoor area.

This condition was not met, and there is no disability access to the terrace area. Moreover, the management of the area detracts from views of the heritage façade (see photograph below from the EIS.)



In the 1930s, this area had appropriate landscaping (see photograph below).



Heritage

The SEARs require that the Heritage Impact Statement “demonstrate the interpretation of the site’s heritage significance, archaeology, and historical association with the development proposal”.

However, the conclusions and recommendations of the HIS contain no references to the interpretation of the site’s heritage significance.

John Freeman

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