

Department of Planning and Environment
Attn: Director – Key Site Assessments
GPO Box 39 Sydney NSW 2001
4th February 2017

Dear Mr Lusher

Redevelopment of Harbourside Shopping Centre – call for rejection of proposal on the grounds of new 50 storey (166m) building and also insufficient access from Pyrmont

Pyrmont is the most densely populated suburb in Australia.

Pyrmont is almost entirely cut-off from the new multi-billion dollar redevelopment of Darling Harbour, despite sharing a common border for several hundred metres with no ground-level access across the Light Rail Tracks between Convention and Exhibition Stations. I have put some photographs together in Appendix 3 which show the poor quality of finish of the current Darling Harbour redevelopment along Pyrmont Street and the apparent disregard for amenity that has been created along Pyrmont Street.

Cockle Bay is a small and strategically important area of national significance, visited by millions of tourists and residents every year and admired for its character and charm. It has never had high-rise buildings which are totally out of place and will ruin its character. This in turn will reduce the attraction of Cockle Bay and potentially the revenue it generates. There does not seem to be any strategic planning on behalf of NSW Planning and Environment with respect to development of the foreshore and heights of buildings, but rather the ad-hoc granting of permission on purely commercial bases to these high-rise building developments on the water's edge.

The first High-rise building was the 35 storey ICC Hotel, which was rushed through the planning stages with no information posted to local residents to allow them to submit timely objections (despite NSW Planning claiming to have done so). The granting of this single 35 storey building was an opening of the floodgates to future skyscrapers in the area which will destroy the character of Pyrmont and Darling Harbour and add to the population over-crowding if applications such as this are granted. I note that this building is already being used as a precedent to building up. I have taken the liberty of providing photographic evidence (in Appendix 2) of the considerable negative visual impact this one skyscraper has had on the views from Pyrmont and from Cockle Bay.

All the current and proposed buildings in Darling Harbour have created a high fortress of 'concrete backsides' to Pyrmont, further isolating Pyrmont from Darling Harbour and making it aesthetically unpleasant to live there.

The proposed new shopping centre will add no amenity to the residents of Pyrmont and will significantly reduce visibility and impose on views from Pyrmont.

Any continued redevelopment of Harbourside or Darling Harbour needs to address the lack of access from Pyrmont at ground level (the proposed Bunn Street Bridge is an improvement on the current 'car-park bridge' but is not a 'ground level' access point to Darling Harbour. Furthermore, removal of the current Harbourside bridge effectively negates the additional access route). There is an easy solution to this (see Appendix 1), which is to open up the Murray St Spur Road to the South of the current Novotel/Harbourside car park and allow pedestrians to cross the light rail tracks directly into Darling Harbour at this point (similar to pedestrianised crossing of tram tracks elsewhere, such as Market City). **This should be a requirement of any future development grants.**

Public access from Pyrmont to Darling Harbour and Harbourside Shopping Centre is currently dangerous and unsafe, involving and encouraging a variety of routes through a busy car-park in order to access these amenities. The proposed Bunn Street Bridge will help this, but users of the car park will now need to use this pedestrian access instead of the current bridge. This will dramatically increase pedestrian traffic on the Bunn Street Bridge and be a danger to traffic on Murray Street (there being no safe zebra-crossing over Murray Street at this point for the majority of Pyrmont residents).

Sound from Darling Harbour has already increased dramatically in Pyrmont apartments since the new ICC tower and other buildings have been completed, with music from Cockle Bay and Tumbalong Park channelled through these buildings and reflected off the concrete surfaces of the ICC tower which rises above all other buildings. With another huge tower, sound pollution will increase again whenever there is an event in Darling Harbour.

The visual appeal of the new ICC Hotel as viewed from the backside is as ugly as a poorly designed 200+ metre erection would be (see Appendix 2 Fig.7 and Fig.6.). The design of the proposed new tower looks equally architecturally insignificant, if not more so and will become another major eyesore from Pyrmont.

I completely endorse all points raised by my MP, Alex Greenwich in his letter to the Minister for Planning on 17th January 2016 and would like to add my weight to his points in Appendix 4 and include them in this submission.

I would ask you to **reject this proposal** and any further developments in the area of Darling Harbour, Cockle Bay, Pyrmont and Ultimo, until you have published a consistent and transparent over-riding development plan for the long-term development of these areas, including substantial plans for improved access and amenity for residents of Pyrmont to Darling Harbour, including but not limited to **my proposal in Appendix 1 below**. I note that zoned 'height maps' have long been part of the local environment plan for Sydney (for instance the Central Sydney Height Map from the 2005 Local Environment Plan – see

http://www.cityofsydney.nsw.gov.au/data/assets/pdf_file/0006/119886/sydney_lep_2005_central_sydney_height_sht_1.pdf) and would have thought NSW Planning would be bound by the sense of building proportions which are contained in such strategic plans.

As a matter of courtesy, I am copying this letter to my MP for Sydney, Alex Greenwich.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Robin Nagy', with a stylized flourish at the end.

Robin Nagy

Unit 137/149-197 Pyrmont Street, Pyrmont NSW 2009

Appendix 1 – Proposal for improved ground-level Pedestrian Access from Pymont to Cockle Bay/Darling Harbour

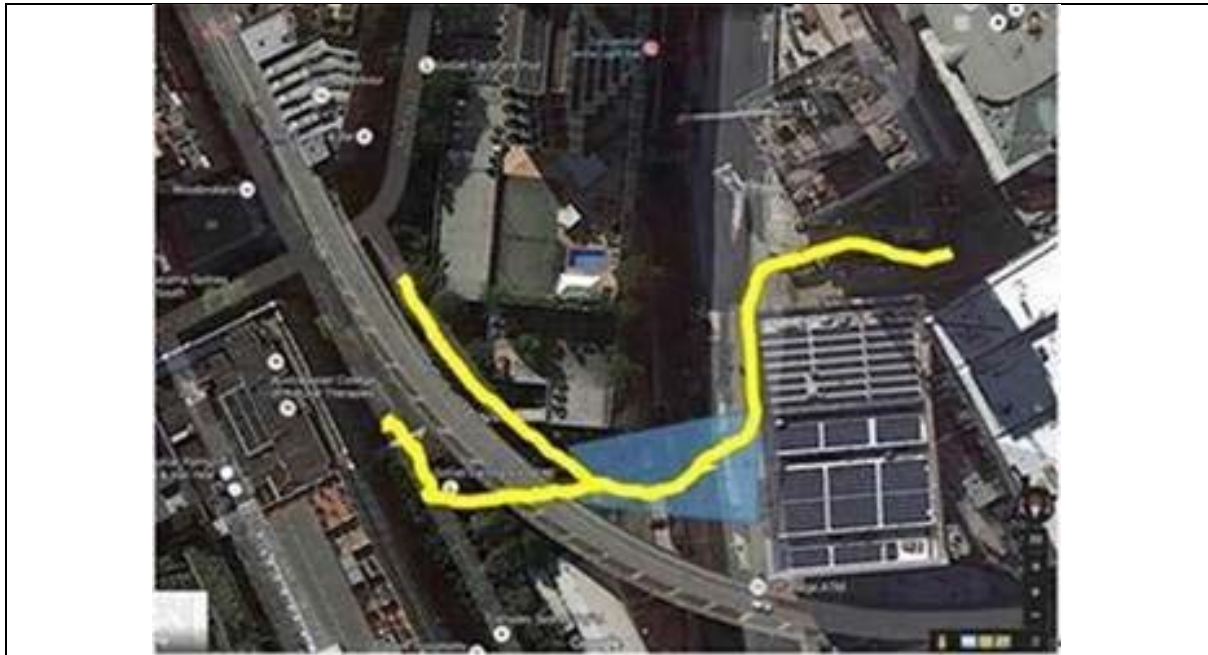


Fig.1. Satellite view of proposed street-level pedestrian access from Pymont to Darling Harbour

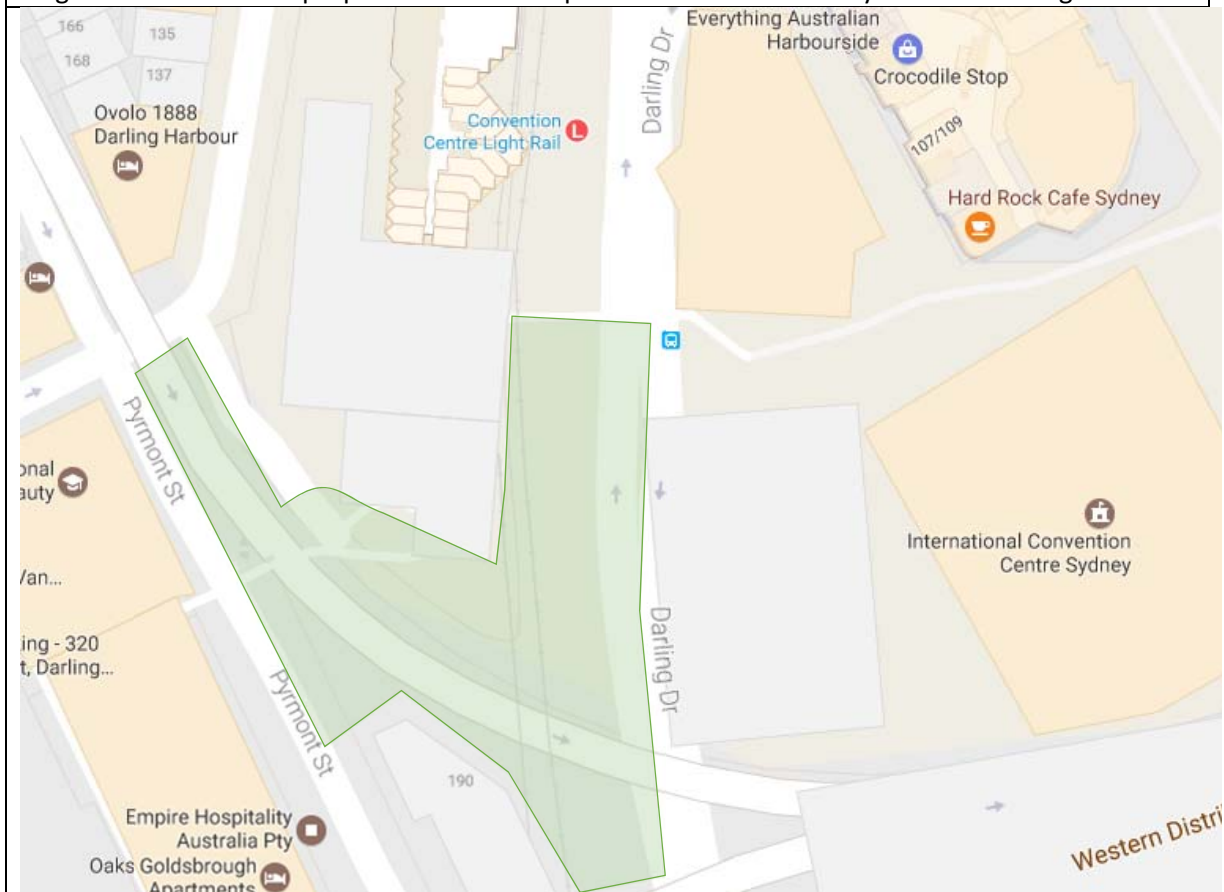


Fig.2 Street Map with proposed street-level pedestrianised area shown shaded in green

In order to substantially improve pedestrian access and amenity from Pymont to Darling Harbour, Cockle Bay and Harbourside, it is proposed to change the use of the land shaded in green in Fig.2 (currently owned by Property NSW and used as a potting shed, plant nursery and a private carpark) to become an open pedestrian area with substantial ground-level access across the light rail tracks to Darling Harbour (similar to the pedestrianised area by Market City where pedestrians can freely cross the light-rail tracks). Opening up Darling Harbour to Pymont was part of the original plan for

Darling Harbour's redevelopment, but became ignored and sidelined due to commercial pressures. This proposal, using the spur road off Murray Street (at the South end of the Novotel Carpark), will go a long way to restoring access and amenity which was taken away, not added to, by the recent Darling Harbour redevelopment (with the removal of a bridge which was in the footprint of the new ICC hotel).

Figs. 3 to 13 present photographs of the proposed area which would be opened up for pedestrian access to provide easy access to and from Darling Harbour from Pyrmont. The shaded orange region is the proposed pedestrian area which abuts the existing pedestrian crossing by the Convention Centre Light Rail Station and ICC Hotel. The area is currently (highly under-)used as a plant nursery and private car park for light rail employees:



Fig.3. View of proposed pedestrianised area (Murray Street Spur is to the left of the photo, existing crossing point at Convention Station visible on the right)



Fig.4. The shaded orange region is the proposed pedestrian area which abuts the existing pedestrian crossing by the Convention Centre Light Rail Station and ICC Hotel (right hand side).



Fig.5. View of proposed pedestrianised area (Gates at the end of the Murray Street Spur are clearly visible on left hand side).

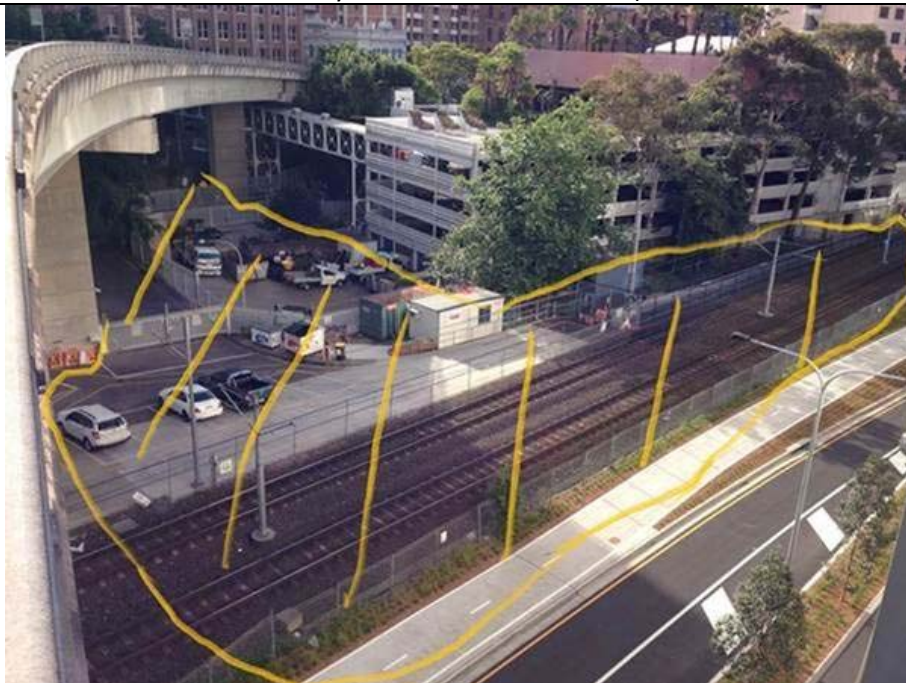


Fig.6. The shaded orange region is the proposed pedestrian area



Fig.7. View of current area owned by Property NSW and used as a plant nursery



Fig.8. View of the Murray Street Spur which is not used by public vehicles but by employees of the Light Rail private carpark



Fig.9. Under-usage of proposed pedestrian area – used as a plant nursery



Fig.10. Gates at end of Murray Street Spur



Fig.11. Gates at end of Murray Street Spur, ending in private car park (on public land)



Fig.12. Staff parking only for employees of Light Rail



Fig.13. The (underused) Staff carpark of Sydney Light Rail on public land which would be the proposed pedestrianised area.

Appendix 2 – Photographic Evidence of impact of ICC Hotel Tower

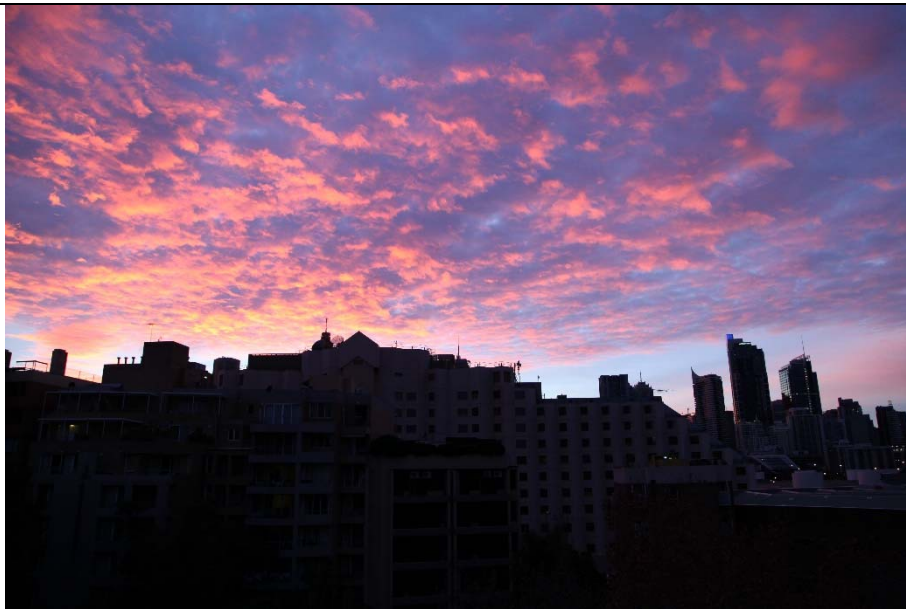
Before and After the addition of a 35 Storey 132m Tower (ICC Hotel)



Figs.1&2. Cockle Bay before construction of new ICC and Hotel (2015)



Fig.3. Cockle Bay after construction of new ICC and Hotel (2017):



Figs.4&5. Views from Pymont Apartment before construction of ICC and Hotel (2015)

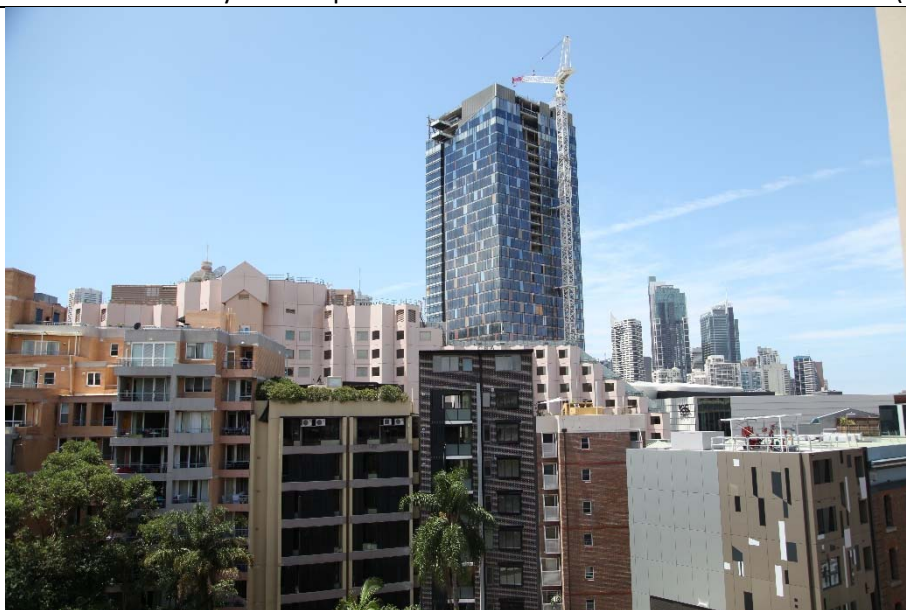


Fig.6. View from Pymont Apartment after construction of ICC and Hotel (2017)

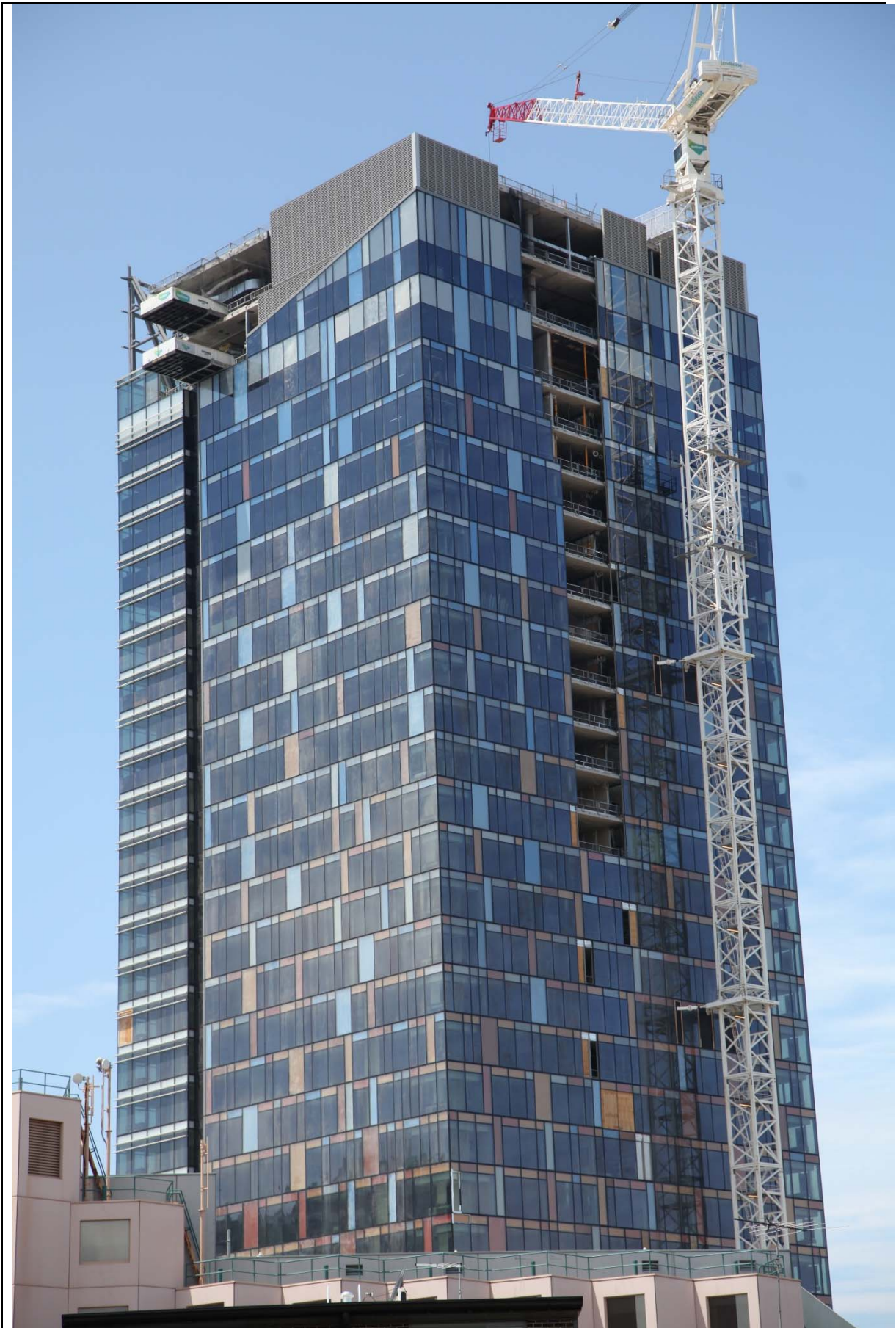


Fig.7. View from Pymont of the ugly 'Back-side' of the ICC Hotel (2017)

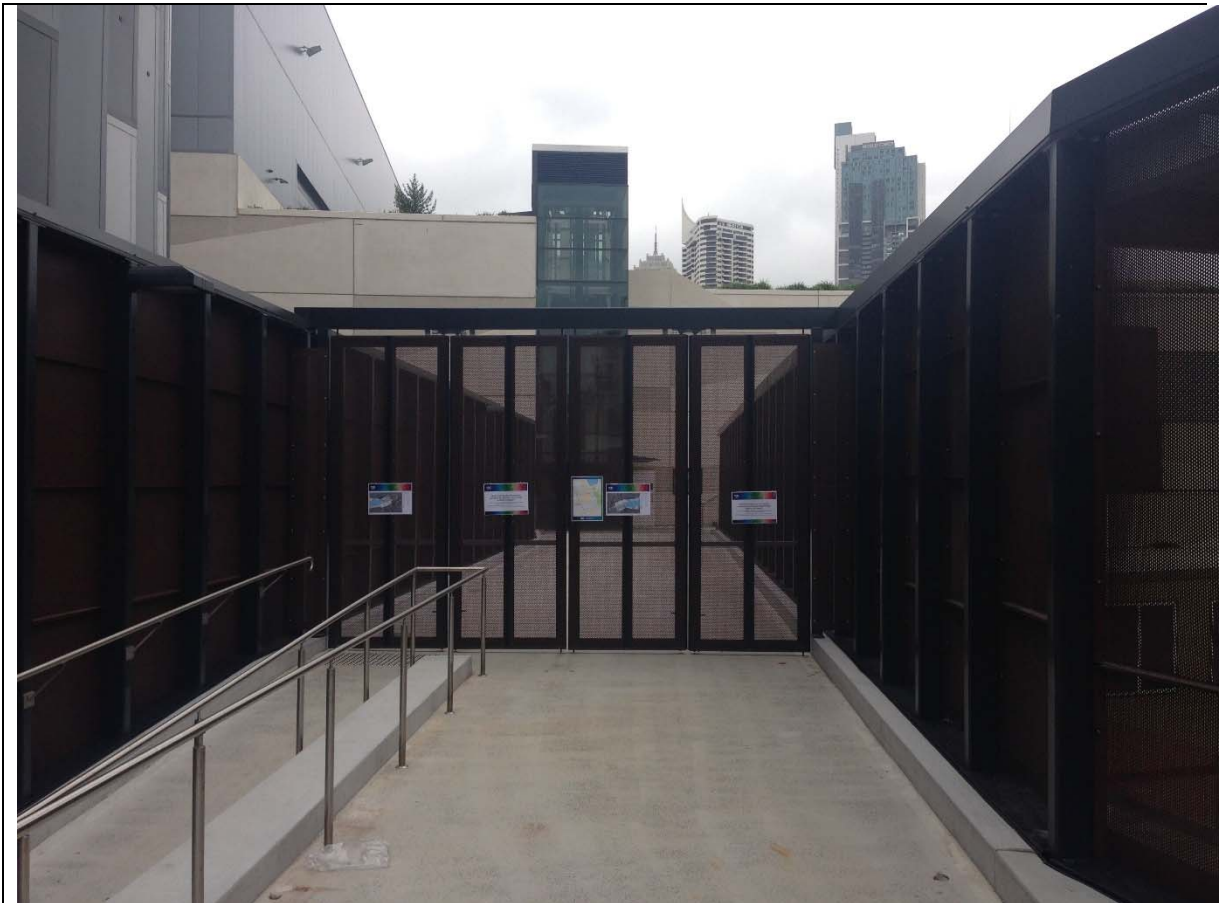
Appendix 3 – Environmental Impact of Darling Harbour redevelopment on Pyrmont



New access to Exhibition Centre 'Event Deck' gates closed.
Recommended access point to Darling Harbour to the North is through a carpark



Blue Arrows show nearest pedestrian access points from Pyrmont/Ultimo to Darling Harbour about 800m apart. North access point is through Harbourside Carpark!



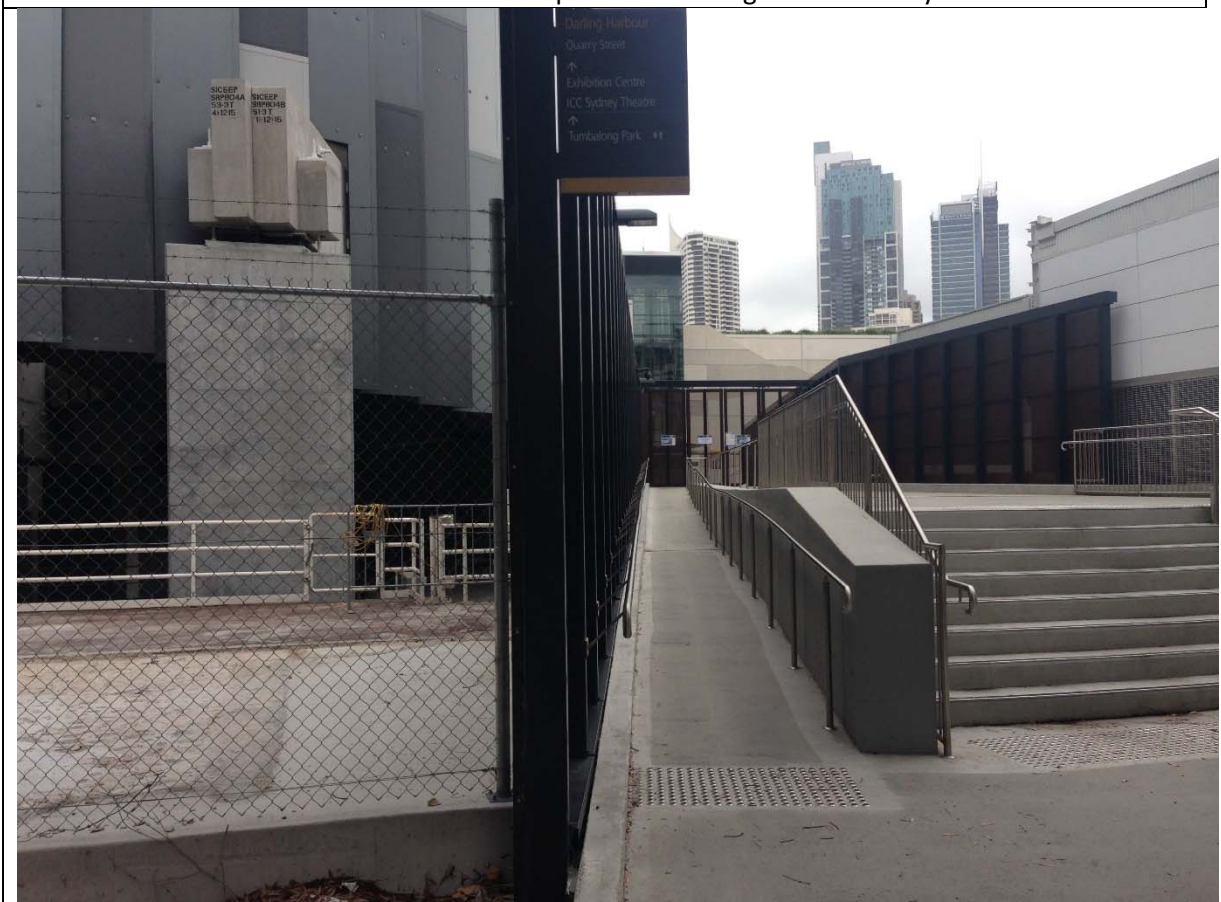
New 'improved' access to Darling Harbour is shut (Quay Street)



Level of 'finish' of Darling Harbour redevelopment work on Pyrmont Street



Finished multi-billion dollar redevelopment of Darling Harbour on Pyrmont Street



LHS caged off section of undemolished, unfinished work on Pyrmont Street with new access bridge on RHS, showing lack of concern for standard of finish on Pyrmont Street.



View from Pymont Street - Old monorail platform left to rot rather than being removed. New Darling Harbour Redevelopment straddles it.



Standard of 'finish' on Pymont Street after Darling Harbour redevelopment



Barbed wire and girders from old Monorail station left untidily after redevelopment of Darling Harbour. View from Pyrmont Street.

Appendix 4 – Alex Greenwich MP Submission

17 January 2016

The Hon. Rob Stokes MP
Minister for Planning
GPO Box 5341
Sydney NSW 2001

Dear Minister

Redevelopment of Harbourside Shopping Centre

The public experience of Sydney's harbour should be at the forefront of all planning decisions that affect the waterfront.

Alarming, more and more high rise towers are being proposed for Darling Harbour, which has traditionally been low rise in order to ensure public benefits. The Harbourside redevelopment is another proposal for a massive tower on the Darling Harbour waterfront; if it proceeds it will contribute to the erosion of this important inner city public domain.

I ask the Department of Planning to act as custodian of the harbour and reject the proposal.

The proposal involves mixed retail and residential uses on the existing 2.05 hectare Harbourside site at Darling Harbour. The development would include a four-level podium across the site for retail, and food and beverage purposes, with a 39 storey tower on the north podium for residential apartments. The total floor space ratio proposed is 87,000 square metres, with 52,000 retail and 35,000 residential.

At the pre-development application stage, the proposal was for a commercial office tower with retail, but now the tower purpose has been changed to residential.

While the application states that residential will allow for a thinner tower, reducing impacts, this change highlights that the tower is not a part of a strategic plan for the region, but is merely an ad hoc whim that will deliver value uplift and profit to the landowner at the cost of greater local amenity impacts and undermining of planning principles for the Darling Harbour precinct and public domain.

Pymont is already the most densely populated part of Australia and there significant high rise residential development is earmarked for the neighbouring Bays Precinct. Increasing adjacent residential populations will only add to the already serious strain on infrastructure and services like roads, schools, childcare and sporting facilities.

Bulk and Scale

The proposed podium and tower mark a massive and unacceptable increase in development compared to the existing low rise, light-weight structure.

The podium is bulky and imposing and would create a four-storey wall along the waterfront with its back to Pymont. The tower is excessively high and would dominate the public domain, water and adjacent Pymont. The bulk and scale would cause significant impacts within and adjacent to this prime waterfront location.

Claims that the massive increase to bulk and height is in line with an emerging change in character to Darling Harbour, with low rise buildings being replaced with "taller, denser and more dramatic new building forms on the water's edge", ignores the very serious cumulative impacts these high rise developments are having on the waterfront and the widespread community concern over the inappropriateness of this "change in character". Each of the recent applications for redevelopment refers to other applications to justify an increase in height but there is no independent strategic assessment in support of towers

on the waterfront.

The application implies that because the site is adjacent to the central business district that it is a suitable location for a 39-storey tower. Expressions like “frame and enclose the Darling Harbour waterway setting” are used to justify the massive bulk and scale even though they have no planning substance and in fact are contrary to good planning principles that support lighter, lower rise buildings on the waterfront.

Darling Harbour is only an attractive place to visit because development has been constrained to keep the public domain at a human scale. This is in line with the longstanding planning principle that requires building heights to recede as they approach the water in order to protect the public experience of the harbour.

The human scale of Darling Harbour waterfront is at risk from approved and proposed towers, and will become an unpleasant place to spend time.

View Impacts

The proposed podium and tower are large and bulky and will significantly impose on both public and private views.

Darling Harbour is dedicated public land adjacent to the central business district and one of its vital roles is providing public access to the harbour, blue skies and a varied skyline. No particular development should dominate outlooks.

The proposed Harbourside tower will dominate immediate to long-distance public views, blocking or imposing on the sky, including from Cockle Bay, Pyrmont Bridge, Tumbalong Park and King Street Wharf as well as Market Street, Darling Drive and the Barangaroo foreshore. This will impact severely on the character, amenity and attractiveness of these public spaces. The outlook from Pyrmont Bridge is particularly concerning as the heavy imposing tower will impact on the experience of walking on this heritage bridge.

A large number of adjacent residents will suffer from significant to devastating view impacts from the proposed development, especially in One Darling Harbour, the Oaks Goldsbrough Apartments and the Gateway Apartments, as well to a lesser degree, the Renaissance Apartments, Arena Apartments, The Phoenix Apartments, Harbour's Edge Apartments and 16-30 Bunn Street.

Views are important to the wellbeing of apartment residents, who live with no private open space. A view can connect someone inside an apartment with the outside world and create a sense of space. Loss of views to apartment residents is a major impact that should be avoided.

The environment impact statement's claims that because the proposed development with massive podium and 39-storey tower includes an observation deck at level three of the podium, the destructive loss of views in adjacent homes is justified because the observation deck results in a public gain while view losses result in a private loss. This is misleading and misrepresentative: the observation deck will be on private, not public land and could be provided for in a much less intrusive proposal.

Traffic Impacts

Providing for 295 residential car parking spaces is excessive and unacceptable given the proximity to other transport options and the already serious traffic congestion in the adjacent road network including in the central business district and Pyrmont. I am particularly concerned that the Pyrmont road network will not cope and will become unsafe for pedestrians and cyclists.

Because jobs, education, services and entertainment are an easy walk or bike ride away, and multiple public transport options are close, some residents will likely lease their car spaces to commuters, adding significantly to congestion. Onsite car parking should be

refused outright: inner city apartments are increasingly being built without private parking and this has not affected demand for them.

Overshadowing

Solar access is essential to the success of public open space.

The proposed redevelopment would result in significant overshadowing of the foreshore and water from lunch time into the afternoon between Autumn and Spring. Lunch time is when Darling Harbour's foreshore is in high demand and the proposed tower and podium will make it unattractive in the colder months. Public open space with sunlight is scarce in the city and many workers and visitors take their lunch break in Darling Harbour to get some winter sun; few will want to spend time there for lunch or passive recreation if this proposal proceeds and they will have few alternative options.

The significant overshadowing of the water during Autumn to Spring will erode the amenity of Darling Harbour and contradicts the government's plans to activate the precinct. It could also reduce the environmental quality of the water by changing its environment.

Pedestrian Access

The proposed street level pedestrian bridge from Bunn Street is an improvement on existing access however I am concerned that already poor access between Pyrmont and Darling Harbour and the city centre will be reduced during construction.

Constituents regularly contact me about the lack of pedestrian access between Pyrmont and Darling Harbour and the city. Despite the close proximity, there are few pedestrian access points, especially after part of the previous walkway attached to the Western Distributor was removed for new lanes as part of the 2004 Cross City Tunnel changes. Many Pyrmont residents are forced to walk long distances via indirect routes despite promises that the Sydney International Convention, Exhibition and Entertainment Centre Precinct redevelopment would improve access.

The timing for removing the car park bridge and installing the new Bunn Street pedestrian bridge is unclear. Should the redevelopment of the Harbourside be approved, conditions must minimise any temporary loss of access.


I share widespread community alarm that the harbour and foreshore is progressively being blocked and privatised, contrary to good planning principles.

This proposal does not appear to offer any public benefits that might help justify such a substantial redevelopment.

An accessible, attractive and public harbour is fast being replaced with private towers dominating and overshadowing the waterfront. If this trend continues, Darling Harbour will be second-rate and another example of poor planning.

The government must reject overdevelopment of this important public recreation harbour site and I call for this proposal to be rejected.

Yours sincerely

A handwritten signature in dark ink, appearing to be 'Alex Greenwich', with a stylized, flowing script.

Alex Greenwich
Member for Sydney