

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.

Pyrmont 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 Pyrmont. The tower is excessively high and would dominate the public domain, water and adjacent Pyrmont. 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 black ink, appearing to be 'AG', written in a cursive style.

Alex Greenwich
Member for Sydney