

20 January 2011

NSW Department of Planning
GPO Box 39
SYDNEY NSW 2001

Attention: Michael Buckley

Dear Michael,

Response to Submissions - Section 75W to Major Project: MP 08_0098 Star City Project Star, Multi-Use Entertainment Facility

On behalf of the proponent, Sydney Harbour Casino Properties Pty Ltd, we have reviewed the submissions received during the public exhibition of the above Section 75W Modification application to Major Project Approval 08_0098 relating to the Star City Multi-use Entertainment Facility (MUEF). We note that whilst comments received from NSW Maritime, Railcorp and Sydney Water do not require a response, a response is required to the comments received from the following public agencies:

- Casino Liquor & Gaming Control Authority
- Roads and Traffic Authority (RTA)
- City of Sydney

Additionally, six submissions were received from members of the public which relate to view loss; scale; change in character to the area; traffic and noise impacts. This letter constitutes the proponent's response to these submissions and details various amendments to the proposed modifications that have been made in response. This response includes:

- Proposed Amendment to the Existing Determination Conditions to incorporate updated plans and some additional information;
- Further analysis of height in response to comments from the City of Sydney;
- An amended external façade treatment to the MUEF;
- Deletion of the pergola structure over the roof terrace to the Pirrama Road infill building;
- Amended photomontages;
- Amended visual impact assessment; and
- Updated traffic impact assessment report.

This letter comprises two parts: a) a description of the amendments to the originally proposed modifications and b) a detailed response to relevant submissions, and includes the following attachments:

Appendix A	Summary of Submissions and Proponents Response
Appendix B	Building Height Justification, by Sceno Plus, dated 11 th January 2011
Appendix C	Arup Transport Report, dated 14 January 2011
Appendix D	Revised Visual Impact Assessment, prepared by GMU, dated 14 th January 2011 including revised photomontages by Arterra
Appendix E	Revised Architectural Plans (to address key issues raised), prepared by Fitzpatrick + Partners, dated 17 th January 2011, Issue 02

Appendix F	View Loss Montage Analysis prepared by Arterra
Appendix G	Revised Height Control Plan, based upon revised ground levels, prepared by Arterra
Appendix H	Section of Views from No. 2 Jones Bay Road over Proposed MUEF, prepared by Fitzpatrick + Partners

1 Proposed Amendments to the submitted Section 75W scheme

1.1 Proposed Amendment to the Existing Determination Conditions (MP 08_0098)

The proposed amendments to the originally proposed modification in relation to the MUEF (MP 08_0098) will result in changes to the wording of two conditions as they were detailed in the Section 75W Application dated 8th October 2010 (note additional text is underlined and in italics).

The changes to the two conditions noted below should now replace the proposed modifications to the conditions as detailed in the Section 75W Application dated 8th October 2010 prepared by Urbis (Section 4.9).

Amendment to Condition A2 of MP 08_0098 to include the insertion of the following words:

- *Condition A2 Development in Accordance with Plans*

The development will be undertaken in accordance with the Environmental Assessment dated September 2008 prepared by Urbis, subsequent Preferred Project Report dated December 2008 prepared by Urbis, the Section 75W Application dated 8th October 2010 prepared by Urbis, the Response to Submissions Letter dated 20th January 2011 and the following drawings prepared by Fitzpatrick + Partners, The Buchan Group, Cox Richardson Architects and Tract Consultants.

The amendment of Condition A2 of MP 08_0098 should now include the insertion of the following plan details in addition to the plans listed in the existing table to Condition A2:

Table 1 – Amendment of Plan Reference in Condition A2 of MP 08_0098

Drawing Number	Revision	Name of Plan	Date
DOP-01	<u>02</u>	Plan Level B2	<u>17/01/2011</u>
DOP-02	<u>02</u>	Level 00	<u>17/01/2011</u>
DOP-03	<u>02</u>	Level 01	<u>17/01/2011</u>
DOP-04	<u>02</u>	Level 02	<u>17/01/2011</u>
DOP-05	<u>02</u>	Level 03	<u>17/01/2011</u>
DOP-06	<u>02</u>	Level 04	<u>17/01/2011</u>
DOP-07	<u>02</u>	Level 05	<u>17/01/2011</u>
DOP-08	<u>02</u>	Roof Plan - Existing	<u>17/01/2011</u>
DOP-09	<u>02</u>	Roof Plan - Approved	<u>17/01/2011</u>

Drawing Number	Revision	Name of Plan	Date
DOP-10	<u>02</u>	Roof Plan - Proposed	<u>17/01/2011</u>
DOP-11	<u>02</u>	Section A-A Existing	<u>17/01/2011</u>
DOP-12	<u>02</u>	Section A-A Approved	<u>17/01/2011</u>
DOP-13	<u>02</u>	Section A-A Proposed	<u>17/01/2011</u>
DOP-14	<u>02</u>	Section B-B Proposed	<u>17/01/2011</u>
DOP-15	<u>02</u>	Street Elevations	<u>17/01/2011</u>
DOP-16	<u>02</u>	Street Elevations	<u>17/01/2011</u>
DOP-17	<u>02</u>	Street Elevations	<u>17/01/2011</u>
DOP-18	<u>02</u>	Shadow Diagrams	<u>17/01/2011</u>
DOP-19	<u>02</u>	Shadow Diagrams	<u>17/01/2011</u>
DOP-20	<u>02</u>	Shadow Diagrams	<u>17/01/2011</u>
DOP-21	<u>02</u>	Project Sky – Level 17	<u>17/01/2011</u>
<u>DOP-22</u>	<u>02</u>	<u>Aerial Perspective</u>	<u>17/01/2011</u>
<u>DOP-23</u>	<u>02</u>	<u>Perspective</u>	<u>17/01/2011</u>

▪ *Condition A3 Development in Accordance with Documents*

In addition, Condition A3 of MP 08_0098 should be amended to include the addition of the following words at the end of the existing condition:

As amended by the Section 75W Application prepared by Urbis dated 8th October 2010, the Response to Submissions Letter dated 20th January 2011 and the following documents:

- (1) Architectural Drawings prepared by Fitzpatrick + Partners, dated 17th January 2011
- (2) BCA Review prepared by Phillip Chun & Associates, dated 6th October 2010
- (3) View Impact Assessment prepared by GM Urban Design & Architecture Pty Ltd dated October 2010 and Revised Visual Impact Assessment, prepared by GMU, dated 14th January 2011 (including revised photomontages by Arterra);
- (4) Economic Impact Assessment of Star City's Proposed Multipurpose Venue, prepared by Urbis, dated October 2010;
- (5) Traffic Impact Assessment prepared by ARUP, dated October 2010 and Arup Transport report, dated 14 January 2011;

- (6) Acoustic Assessment prepared by AECOM, dated 7th October 2010
- (7) Crime Prevention Through Environmental Design report prepared by Urbis dated October 2010
- (8) Ecological Sustainable Development Statement, prepared by Cundall, dated 7th October 2010
- (9) Accessibility Report prepared by MGAC, dated 7th October 2010
- (10) Fire Engineering Statement prepared by AECOM, dated 5th October 2010
- (11) Letter of Assessment of Solar Reflection from Facades, prepared by AECOM, dated 7th October 2010.

1.2 Design Amendments to Originally Proposed Modifications

In response to the various submissions and in particular the City of Sydney submission, a number of amendments have been made to the originally proposed modifications (refer Appendix E, Revised Architectural Plans). Overall, the proposed amendments will result in a structure with reduced bulk and scale and of improved visual appearance.

The following plans depict the proposed amendments to the submitted Section 75W scheme:

- Revised external cladding treatment to the MUEF by adopting an external façade of large faceted planes to form a minor convex profile to the MUEF's "external skin".
- A reduction to the height of the parapet around the top perimeter of the proposed structure.
- Relocation of some building plant components to the adjoining plant building which will be increased in height from RL 130.04 to RL 136.35.
- The amended "back of house" and plant building to be finished in a cladding to match that of the casino building. It will include some fenestration to articulate the northern elevation. Inclusion of a landscaped edge along the northern edge of the building along the Jones Bay Road frontage.
- A reduced pre-function area and a revised interconnecting circulation pod.
- Minor internal layout reconfiguration relating to lift location and stairs; back of house/storage area; kitchen, meeting areas and the like on level 3; new cloak room/merchandise and FOH and Bar store area on Level 3; relocation on bar area from Level 4 to level 5; deletion of business centre / meeting rooms from Level 5 and increased plant area.
- Deletion of the previously proposed pergola structure to the roofdeck of the approved Pirrama Road infill building on Level 3.

1.2.1 Amended External Façade Treatment and Form to the MUEF

The previously submitted scheme entailed a façade to the MUEF which incorporated external cladding in an opaque material of metallic appearance with a vertical decorative finish. The building outline of the proposed scheme as submitted was rectangular with rounded corners.

The revised scheme amends the external cladding treatment to the MUEF by incorporating a "gem" like shape adopting an external façade of large faceted planes to form a minor convex profile to the MUEF's "external skin", to create a similar appearance of a gemstone (Refer to Figures 1 and 2 below).

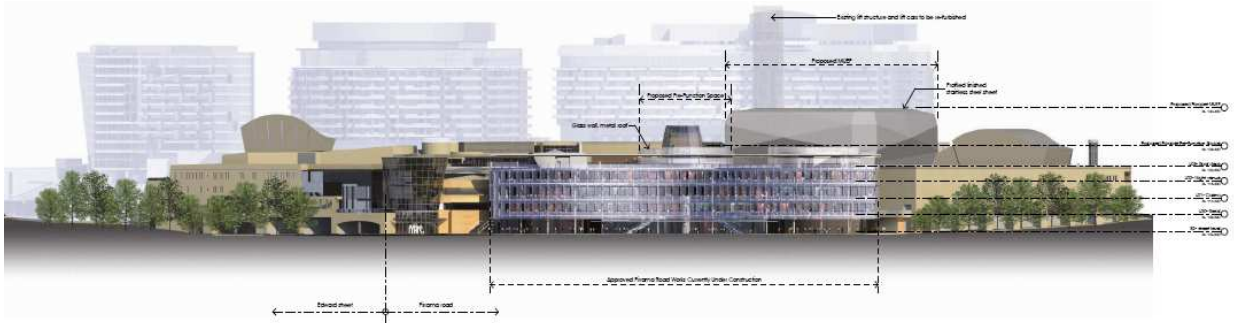


Figure 1 – Pirrama Road (East) Elevation indicating the revised profile of the MUEF

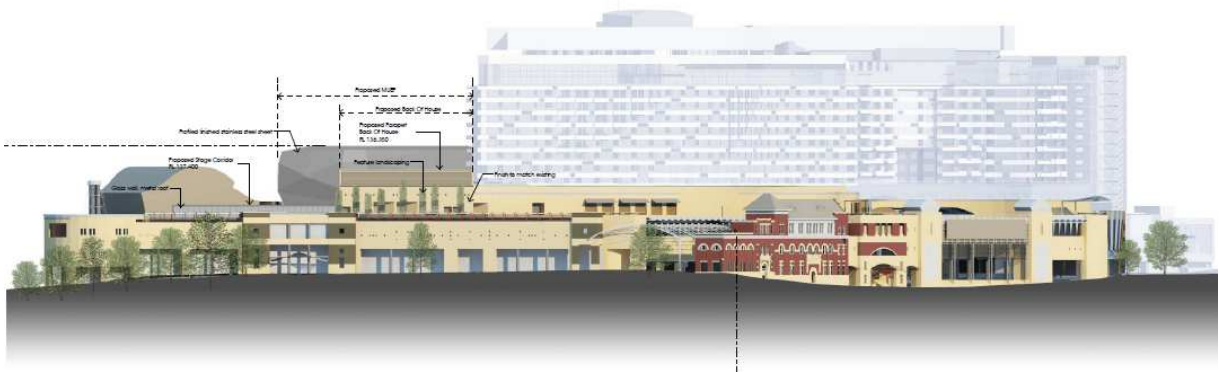


Figure 2 – Jones Bay Road (North) Road Elevation indicating the revised profile of the MUEF

As part of this revised profile, the upper corners of the MUEF will become chamfered in form. The façade will constitute finished stainless steel planes which will have a matt satin finish and a reflectivity of less than 20%. Each large faceted plane will be separated with a gap incorporating a strip of lighting element to highlight the edges of the individual facets. The revised façade treatment is proposed in response to the City of Sydney issues raised in relation to visual impact. The amendment visually softens the previous hard lines of the proposed structure.

The revised façade treatment proposed is depicted by drawings DOP 13 & 15 and is illustrated by the revised photomontages below (refer to Figures 3 and 4 below).



Figure 3 - Photomontage showing amended MUEF façade



Figure 4 – Photomontage showing amended MUEF as it relates to the existing roof elements and towers

Although the maximum height of the MUEF remains the same as the submitted scheme (RL 140.4), the height at the upper corners of the MUEF are slightly reduced to create a softer, faceted profile as opposed to the previous square profile scheme. This has been achieved by chamfering the building parapet as part of the overall faceted building form, which also results in a reduced building bulk.

The pre-function area and connecting circulation pod have also been reduced in size.

The proposed plant room area that immediately adjoins the north-eastern side of the MUEF has been reconfigured to a narrower floor plan and increased in height from RL 130.4 to RL 136.350 as depicted by drawing DOP-10. The reconfiguration of the plant room area will not extend above the profile of the proposed MUEF profile.

The amended back of house and plant building will be finished to match the existing casino podium and fenestration is proposed to articulate the northern elevation of the structure to Jones Bay Road. The landscape of the existing podium will be extended between the northern edge of the back of house structure and Jones Bay Road, further softening the visual impact of the structure.

1.2.2 Deletion of the pergola structure over the roof terrace to the Pirrama Road infill building

The submitted Section 75W scheme sought to include a pergola structure with sail cloth sun shading to the roof deck of the approved Pirrama Road infill building. This pergola structure is deleted from the Section 75W proposal (refer Drawing DOP-05).

2 Response to Submissions

2.1 Height – Ground Level (Comments from City of Sydney (CoS))

The CoS has queried the methodology adopted in determining ground level for the purpose of calculating compliance with the height standard. The CoS state that the calculation of height should also take into account the ground level at Pirrama Road (RL 102.8) as well as ground level at Jones Bay Road (RL 110.02).

Proponent's Response

SLEP 2005 defines building height as:

“height of a building on land within Ultimo-Pyrmont means the vertical distance measured in metres between the natural surface level of the ground on which the building is sited or, where the natural surface has been excavated, the land of the adjoining public domain, and the ceiling of the topmost habitable floor of the building above that point”.
(our underlining)

As the entire site has been excavated and the proposed structure has a complex relationship to several irregular frontages, Arterra have been engaged to use survey data of ground levels at all points around the entire site to digitally create an inferred original ground surface for all points on the entire site. This irregular inferred level (3 dimensional surface mesh) was then extruded 21 or 28 metres up as relevant to the applicable height standard (refer Figure 5 below, and Appendix G). This is the only meaningful way of relating the various frontage heights of the site to the proposed structure.

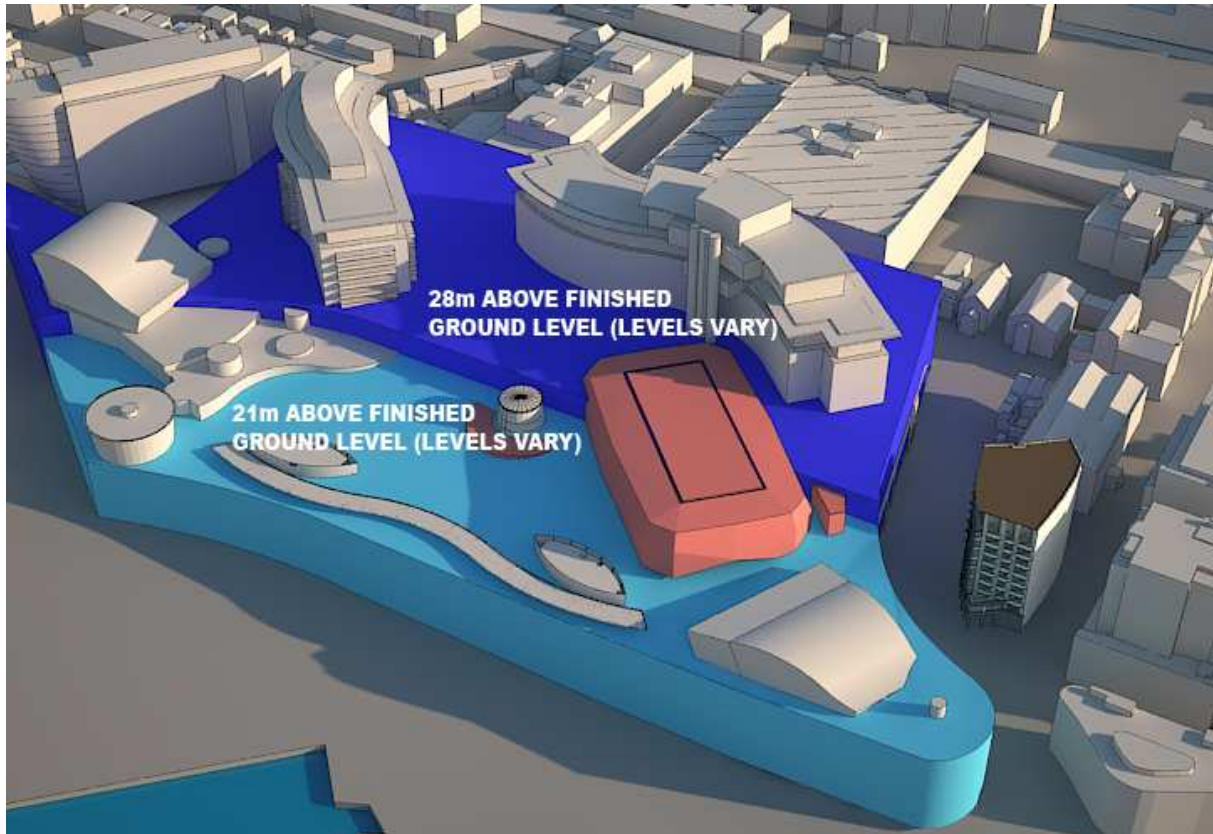


Figure 5 – Revised Height Control Diagram, based upon the levels at all points of the site

2.2 Height – Ceiling Level (Comments from City of Sydney (CoS))

The CoS has queried:

- The methodology adopted in determining proposed height of the MUEF regarding the reliance on a low ceiling.
- The ambiguity of the adopted ceiling level of 5m below the roof; and
- Clarification as to the purpose of an excessive space in between roof and ceiling and therefore whether ceiling height should be actually be higher, such that the calculated height is actually greater than described.

Proponent's Response

Given the irregular form and variable function modes of the proposed building, it is difficult to define one specific ceiling height. While we note that most buildings have significant roof structure, parapets and roof plant (e.g. lift overruns and chillers) above the height of their topmost ceiling, we have taken the very conservative approach of analysing the visual impact of the topmost structure of the building relative to a height control applicable to the topmost ceiling. Whilst our previous submission identified what we considered to be the ceiling height of the structure, all of our analysis was and is based upon the actual impacts of the topmost points of the structure, which houses all the plant typically provided above roof level.

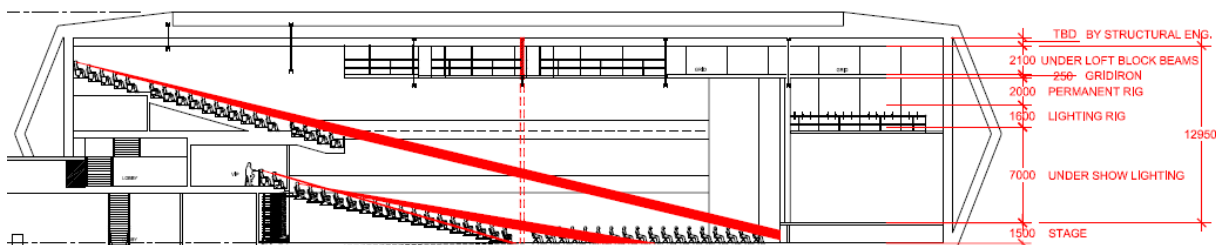


Figure 6 – Amended Internal cross-section of proposed MUEF prepared by Sceno Plus – see A3 copy at Attachment E

Regardless of what level one defines the ceiling of the structure be, this level is clearly well below the topmost point of the roof structure upon which our merit assessment of visual impact and view loss has been based.

2.3 Height – Non-compliance (Comments from City of Sydney (CoS))

CoS calculation of height results in a non-compliance of between 3.6m and 10.6m over the current maximum height controls.

Proponent's Response

It is acknowledged that the proposed structure does not wholly comply with the applicable 21 and 28 metre building height standards. However, we submit that in the circumstances a purposive consideration of compliance is warranted in terms of the underlying objectives of the standard. Issues of skyline impact, streetscape and overshadowing are not relevant in this case. From most distant locations the proposed structure will be read in the context of the significantly taller casino towers immediately behind. The salient issues with regard to height compliance in this case are therefore visual impact from surrounding sensitive locations and view loss – specifically from apartments within No. 2 Jones Bay Road.

As detailed below, the proposed development is entirely satisfactory in these regards, and we therefore submit that the significant entertainment benefits of the project to the state considerably outweigh a minor issue of technical non-compliance.

2.4 Visual Impact

The CoS and some residents of No. 2 Jones Bay Road have objected to the visual impacts of the MUEF. The CoS agree that there is no issue from distant vantage points, but raises concerns in relation to views from:

- The Heritage Walk;
- Medium range views from Harris Street at the northern extremity of the Pyrmont Conservation Area;
- Mount Street and
- Ways Terrace.

Specifically, the CoS suggests that the proposed structure will restrict views from these locations across Darling Harbour and have a detrimental impact upon the character of the views from these areas.

Some objections have also raised a general objection to the scale of the MUEF relative to that of the existing casino.

Proponent's Response

The visual impact of the amended scheme will be appropriate within the context of the varied surrounding building heights and will represent a transitional height from most vantage points. In particular as the MUEF is in the foreground to the existing casino towers behind the structure will appear as an intermediate built form from most perspectives.

The specific visual impact issues raised in submissions have been assessed in detail by GMU Design in the supplementary visual impact assessment attached as Appendix D. In respect of the public views arising from the CoS concerns, GMU Design conclude:

- The impact of the MUEF upon the current view from the Heritage Walk is acceptable as the proposed MUEF will not occupy a large portion of the sky nor will it have a detrimental impact on the expansive views across and above the existing Casino building included in the assessment. GMU Design further note that the proposed amendment to the original MUEF form provides further articulation of its apparent bulk and scale.



Figure 7 – Photomontage of proposed MUEF from the Heritage Walk



Figure 8 – Photomontage of proposed MUEF from Pyrmont Bay

- The proposal will not restrict views to Darling Harbour in respect to medium range views from Harris Street (at the northern extremity of the conservation area), Mount Street or Ways Terrace as none of the views look across the proposed extension towards Darling Harbour and the CBD. Existing taller buildings currently obstruct views from these areas such that there is no possibility to view the proposed MUEF. In particular:
 - The views from heritage items (73 – 75) located along Mount Street and item 74, being McCaffery's Building towards the MUEF are obstructed by the existing Star City Casino Hotel and fly tower.
 - The views from heritage items 95 and 96 (Way's Terrace at 12-20 Point Street and Cottage at 4 Way's Terrace) will not be impacted on given that views towards the City or Darling Harbour are directly east and away from the proposed MUEF. An existing medium density residential development between these terraces and the proposed MUEF also blocks the view corridor through to the Casino extension.
 - There will be no significant view impacts from the northern extremity of the Pyrmont Conservation Area due to limited view corridors from this area towards Darling Harbour or iconic CBD buildings; the view line to the city skyline is to the south-east and the MUEF is situated more directly south; the Star City Casino Hotel towers block the view towards the MUEF from this location.

2.5 View loss

The CoS and Residents of No. 2 Jones Bay Road have raised adverse private view loss impacts as a result of the MUEF. The CoS identify loss of views from floors 3 to 8 facing south east at 2 Jones Bay Road, with significant impact from the 5th floor and above. CoS recommends utilising the Land and

Environment Court's Planning Principles (the "Tenacity" tests) in relation to view sharing when considering view impacts.

Proponent's Response

The revised external form of the MUEF façade results in chamfering to the upper roof perimeter of the MUEF which will lower the perimeter height as viewed from the upper levels of the adjacent apartment building at 2 Jones Bay Road. This design enables an improvement of views towards the south-east in comparison with the previously submitted scheme in October 2010. Revised photomontages and a revised visual impact assessment have been prepared and illustrate that the impact upon views from the two most affected units on the opposite side of No. 2 Jones Bay Road will be less than that of a compliant scheme. This is discussed in greater detail in the Visual Impact Assessment prepared by GMU Design and attached as Appendix D. The montages upon which this analysis is based are included in A3 form at Appendix F.

On the basis of the advice from GMU Design, we conclude:

- At the eastern balconies of Levels 3 to 6, a hypothetical development complying with the 28 metre height limit would obstruct the full height of views west of the intersection of the 21 and 28 metre height zones. However, most of the existing view over the 21 metre height zone would be retained.
- When viewed from the eastern balcony at Level 7, as the eye level of a person standing on the balcony is lower than the height of a 28m vertical plane above the Jones Bay Road frontage of the site, sightlines over the 28 metre vertical plane will continue on an inclined plane such that they project over the MUEF, obscuring views to the MUEF.
- As eye level standing on the eastern balcony of Level 8 is still lower than the height of a 28m vertical plane above the Jones Bay Road frontage of the site, a hypothetical compliant development would still screen views from the Level 8 Balcony to the MUEF.

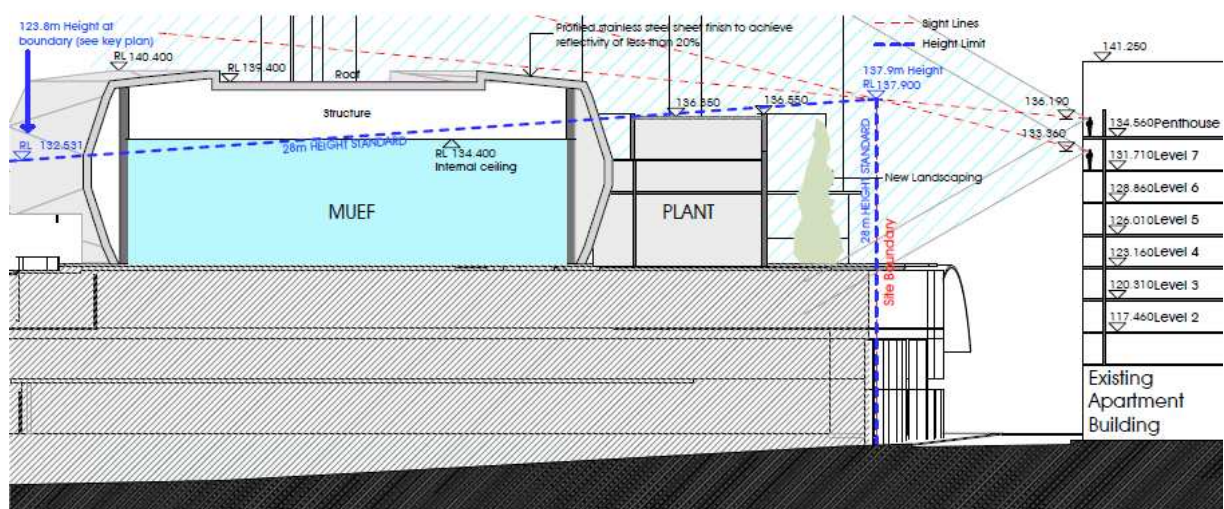


Figure 9 – Cross Section of Views from No. 2 Jones Bay Road over Proposed MUEF, prepared by Fitzpatrick + Partners - see A3 copy at Appendix H

2.6 Design Details

The CoS has objected to the absence of details regarding various design elements of the proposal, including:

- Photomontages of the existing towers that are now proposed to be 'lit-up' rather than clad with glazing as per the original consent;
- Detailed drawings of the MUEF façade; and
- Detailed drawings of the 'Lightweight Roof Structure (pergola)' which spans 100m in width at the Pirrama Road frontage.

Proponent's Response

In relation to these points we note that:

- The only amendment to the originally proposed modifications to the existing towers is the deletion of the previously proposed cladding. Whilst new lighting arrangements are being considered, these have not been resolved and are no longer proposed within the current application.
- Revised detailed drawings of the MUEF façade are now attached (refer Appendix E).
- The pergola structure has now been deleted.

2.7 Amenity Impacts

The CoS has queried how the venue and the events will be managed and proposes that robust management and security plans will be required. CoS suggest that there should be restrictions to the type of pre-function entertainment in the unenclosed areas on the podium to minimise noise impacts.

A public submission further requested that pre-function areas be treated with appropriate acoustic insulation and amplified music be prohibited in any external areas.

Construction noise impacts are also raised and CoS requests that a Construction Noise Management Plan be prepared prior to commencement of works.

Other amenity considerations raised by the public include the changing character of the Pyrmont area towards a residential nature such that the considerations of the residents should be granted priority; and potential anti-social behaviour.

Proponent's Response

The existing Security Plan of Management for Star City will be updated and submitted to the Department of Planning prior to the operation of the MUEF. We also note that the facility will be accessed through the existing managed facilities and therefore will adopt the same entry and exit procedures.

A Construction Noise Management Plan will be prepared prior to commencement of works in respect to the MUEF.

2.8 Proposed loading facilities and construction traffic

CoS requests further detail in relation to expected loading and servicing requirements for the MUEF given the range in scale of future events, including equipment and trucks to be catered for. The RTA has also requested plans to demonstrate the adequacy of the proposed loading facilities for heavy vehicles relative to AS 2890.2 – 2002 and AUSTROAD requirements.

A Construction Traffic Management Plan has also been requested prior to commencement of construction.

Proponent's Response

Additional transport and loading details have been prepared by Arup and are attached as Appendix C. The submission identifies that:

- The MUEF will utilise the existing loading dock off Pirrama Road, previously utilised by the Star Theatre (now defunct). Trucks will enter the site via the bus interchange, which is one way and exit from Pirrama Road north of Jones Bay Road.
- The loading dock is designed for one truck at a time, with no provision for an additional holding area on site. It is proposed to manage truck arrivals via a staggered approach so that arrivals only occur when the dock is free. This is to ensure the bus interchange and surrounding roads are not impacted by truck movements within the loading dock.
- Smaller rigid trucks will be accommodated at the entrance of the loading dock. However, larger trucks (the largest with 13.7m container) would be required to park to the right of the internal bus carriageway with goods unloading through the loading dock. A truck parked along the internal bus carriageway will allow buses to pass the stationary truck as shown in the diagram attached within Appendix C. To further minimise loading impacts, loading and unloading will generally occur at off-peak times to reduce the number of occurrences.
- A Construction Traffic Management Plan for the MUEF will be prepared prior to construction and can be implemented as a condition of consent.

2.9 Additional gaming facilities

CoS refers to a lack of social impact assessment of the additional gaming facilities by conversion of the Astral bar into a private gaming room.

Proponent's Response

The licensing of the casino and the number of gaming machines/tables is regulated by the Casino Liquor and Gaming Control Authority (GLGCA), who have raised no objection to the gaming use of Level 17.

The existing Security management Plan will be amended in accordance with CLAGA requirements prior to the commencement of use of Level 17 for gaming purposes.

Conclusion

The additional documentation and amendments now proposed to the MUEF modifications are submitted in response to issues raised by public agencies and the general public. The primary matters arising from the public exhibition process relate to visual impacts and view loss, with other matters such as traffic and amenity also being raised.

Overall, the proposal entails an appropriate design outcome and further improvement to the facility as follows:

- The revised scheme amends the external cladding treatment to the MUEF by incorporating a "gem" like shape by adopting an external façade of large faceted planes to form a minor convex profile to the MUEF's "external skin". As part of this revised profile, the upper corners of the MUEF will become chamfered in form. The revised façade treatment is proposed in response to visual bulk issues raised by the City of Sydney, and will soften the visual form of the structure.
- The amended scheme includes a slight reduction to the height of the parapet corners by chamfering the building parapet through the utilisation of flat faceted planes which reduce the visual impact to dwellings at 2 Jones Bay Road.

- The visual impact of the amended scheme will be appropriate within the context of the varied surrounding building heights and will represent a transitional height from most vantage points. In respect to public views, the additional visual impact assessment by GMU Design concludes that the impact of the MUEF upon the current view from the Heritage Walk is acceptable. It is also concluded that the proposal will not restrict views to Darling Harbour in respect to medium range views from Harris Street, Mount Street or Ways Terrace as none of the views look across the proposed MUEF towards Darling Harbour or the CBD. Existing taller buildings currently obstruct views from these areas such that there is no possibility to view the proposed Star City extension.
- Whilst the topmost point of the proposed MUEF exceeds both the 21 and 28 metre height controls, the variable ceiling level is largely below the 28 metre control. More significantly, a hypothetical development complying with the 28 metre height limit to the Jones Bay Road frontage would be taller than the viewing height from all balconies within No. 2 Jones Bay Road. The resultant inclined view lines over this plane mean that the actual view loss resulting from the proposed MUEF, which is setback from the boundary, will be less than that of a hypothetical complying development, notwithstanding the departure from the height control. While there is some minor visual intrusion east of the 28 metre height zone, this does not obscure any of the numerous iconic elements comprising the subject views.
- GMU Design have applied the view tests established by the land & Environment Court in *tenacity v Warringah Shire Council* and concluded that the view loss is not unreasonable.
- In respect to other matters raised such as design details, loading arrangements and amenity impact, these matters have been addressed through amendments to supplementary information.

In view of the above, we submit that all issues raised through the assessment process have been suitably addressed, and that none of the impacts of the proposed development are unreasonable in the circumstances.

In view of the significant benefits of the project to Sydney and NSW, we request that this important entertainment facility be approved subject to standard conditions.

Yours sincerely,



Ian Cady
Associate Director