

11 December 2020

Our Ref: R/2016/41/C  
File No: 2020/552749  
Your Ref: SSD-7874

David Glasgow  
Principal Planning Officer – Key Sites Assessments  
Department of Planning, Industry and Environment

By Planning Portal

Dear David

**Additional Response to Submissions – Harbourside Shopping Centre  
Redevelopment (SSD 7874)**

Thank you for your correspondence dated 30 November 2020 requesting for the City of Sydney Council (“the City”) to comment on the additional Response to Submissions (RTS) for the Harbourside Shopping Centre Redevelopment concept proposal.

The proposal seeks to respond to the strategic visions, directions and special considerations of the Draft Pyrmont Peninsula Place Strategy (Draft PPPS). The City reiterates its supports for the intent of the Draft PPPS for a place-based, people focused review of the planning potential of the Pyrmont Peninsula that align with the framework of the Eastern City District Plan (District Plan).

However, the proposal’s reliance thereon is inappropriate and premature at this stage. It is emphasised that the Strategy is a draft and presents broad and preliminary visions that require further refinement and consultation.

Specific comments are made to the proposed residential land uses that would essentially constitute half of the indicative land uses of the development. Special consideration must be made to Place Priority 4 of the Tumbalong Park sub-precinct under the Draft PPPS and the *Planning Priority E7 – Growing a stronger and more competitive Harbour CBD* of the District Plan. Whilst an employment focus is taken, permitting ‘limited residential development without compromising the sub-precinct’s tourism, entertainment and commercial functions’, as indicated in the Draft PPPS, is not the same as permitting limited ‘residential development without compromising commercial development’ as stated in the District Plan.

The District Plan identifies Darling Harbour as part of the Harbour CBD that contributes significantly to Greater Sydney’s global and national economic strength as a major anchor of the Eastern Economic Corridor. The District Plan recognises that there is limited capacity to attract the investment that will support the expansion of Sydney’s CBD footprint and increase the supply of premium office space and industry clusters.

The City emphasises that consideration of the development must be made against the economic priorities relevant to Central Sydney under the District Plan as well as other City related strategies.

For the case of Central Sydney, the draft Central Sydney Planning Strategy and Sustainable Sydney 2030 recognises the role of Central Sydney, including Darling Harbour, in contributing towards Sydney being a global city with a commercial core to support and protect economic and employment growth opportunities. These priorities are also derived from the economic targets prescribed in the District Plan. This is to ensure that planning for job growth in Central Sydney is protected from the overwhelming residential demand to access jobs and services.

The District Plan suggests that the site and its place within the Harbour CBD is best suited for commercial related land uses that consider the long-term public benefit and longevity of Sydney as a global city with a strong economic core. Introducing residential development results in short-term financial gain that is contrary to the priorities of the District Plan, the Draft PPPS and other strategies.

A balance must be struck in ensuring that commercial core areas, particularly within the City Centre and moreover in Darling Harbour, is maintained and realise other strategic priorities of the State. Darling Harbour has long been a precinct for the public and should remain so. The proposed residential use would diminish the enjoyment of the foreshore and Darling Harbour as a public asset and precinct for leisure, recreation, entertainment, culture, education and commerce, which is not in the public interest.

In light of the above and having regard to most recent RTS that do not alleviate the issues raised in the City's previous correspondence dated 11 November 2020, the City ***maintains objections*** to the development.

Should you wish to speak with a Council officer about the above, please contact Reinah Urqueza, Specialist Planner, on 9265 9333 or at [rurqueza@cityofsydney.nsw.gov.au](mailto:rurqueza@cityofsydney.nsw.gov.au)

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A-T', is positioned above the printed name and title of the signatory.

**Andrew Thomas**  
**Acting Director**  
City Planning | Development | Transport