

12 May, 2021
S L, Sydney

Mr Jim Betts
Secretary of the Department of Planning, Industry and Environment

Submitted via the major projects web portal

Attention: Karl Fetterplace

**Objection to SSDA 34196 50-52 Phillip Street New Hotel/Residential
Building Stage 1 Concept DA**

Thank you for the opportunity to comment on the above proposal currently on public exhibition.

I **object** to the proposal for the following reasons:

1. Adverse Heritage Impacts on 50 Phillip Street

The proposal would have a significant and inappropriate intrusion on the heritage listed building at 50 Phillip Street and the Chief Secretary's building at 121 Macquarie Street. It would dramatically change the appreciation of 50 Phillip Street, as it will extend over more than half the length of the historically significant Phillip Street elevation.

The proposal erodes the appreciation of 50 Phillip Street as a freestanding building and its important place in the setting for the First Government House Site which is directly opposite.

The massive structural column inserted into the lightwell of 50 Phillip Street is a wholly inappropriate and irreversible intrusion into the significant spaces of this site. It is difficult to see how this column can be inserted into the lightwell without significant damage to the surrounding heritage fabric and worse still, it would never be able to be removed.

2. Adverse Heritage Impacts on Nearby Heritage Items

The proposal has adverse impacts on the adjacent listed Astor Apartment Block. It will dominate the skyline and the urban setting of The Astor. Any proposal for 52 Phillip Street should be lower and not be the current excessive height.

3. National Heritage Listing – Governors Domain and Civic Precinct

The site is now included within the National Listing for the Governor's Domain and Civic Precinct. It is extremely important that heights and bulk of any development within this curtilage are now scaled down along the eastern

edge of the CBD in order to protect the setting, significance and appreciation of this nationally important domain.

The Department is urged to require the referral of this proposal now under the Commonwealth's Environment Protection and Biodiversity Conservation Act 1999. It should not be allowed to progress so the referral only occurs at Stage 2.

4. Heritage Impact Assessment

I disagree with the findings of the heritage impact assessment.

The argument that the proposal is acceptable because there are other examples in Sydney where bulky and substantial tower developments overhang smaller heritage buildings is fundamentally flawed. The Chief Secretary's Building and its annexe at 50 Phillip Street are of considerable significance and should not be impacted in this way. Consideration must be made of the impact of this proposal on this site and to this precinct.

The HIS demonstrates an extraordinary lack of concern for the proposal's encroachment over 50 Phillip Street and should be disregarded.

An independent heritage assessment must be commissioned by the Department to assess all the heritage values of the site, adjacent heritage buildings, the precinct and the Governor's Domain.

5. Design and structural support

I have no objection to the redesign of 52 Phillip Street and to the use of this site as a hotel and luxury apartment complex. I believe that there is potential to improve the elevations to both Phillip Lane and to the north overlooking 50 Phillip Street.

However, its structural support must be entirely provided from 52 Phillip Street and it should not require support from any other site.

52 Phillip Street is frankly too small a site for a building of this height and bulk.

The volume of the new building should not overhang 50 Phillip Street at all.

The current design is ungainly and overbearing and will erode the integrity of the heritage building stock of the precinct.

6. Failure to demonstrate Good Design

The envelope proposed is simply result of the the site boundaries, the sun access planes and the limits of the structural design rather than any true exploration of what is appropriate on 52 Phillip Street site.

The lower levels immediately above the current roof level of 50 Phillip Street will be exposed structure and are only a function of the tremendous structural cantilever. They offer a blank and unappealing façade toward adjacent sites and the urban form in general.

7. Phillip Lane

Phillip Lane is a relatively minor service Lane which is not adequate to receive the traffic generated by a 47 story hotel and apartment complex. The extremely tight vehicular entrance to the proposal is excessively optimistic and frankly not functional. The adjacent heritage buildings have already been damaged by oversized vehicular traffic and more traffic is only going to increase this risk.

8. Impacts on adjacent residential apartment buildings, in particular The Astor

The proposal will have a significant impact on the visual privacy on the Astor apartments which face Phillip Lane and on its rooftop terrace which is the site's only communal open space.

The EIS is fundamentally flawed assessing these impacts, particularly because the proposal does not meet the 12m set back parameters of the Apartment Design Guide, (ADG).

9. Overshadowing

The proposal will overshadow significant public sites and spaces, particularly the north portico of the Mitchell Library. This further overshadowing of public space and sites so important to the public life of Sydney should not be allowed.

This unsolicited proposal for the redevelopment of 52 Phillip Street will have significant and totally unacceptable impacts on 50 Phillip Street, 12 Macquarie Street (The Chief Secretary's Building), 123-125 Macquarie Street (The Astor Apartments) and the Governor's Domain Nationally listed Precinct. Given the number of impacts, I urge the Department to refuse the application.

Thank you for the opportunity to provide comment.

Yours sincerely,

Name withheld