

3 February 2022

Ms Lucinda Craig  
Industry Key Sites  
Department of Planning & Environment  
12 Darcy Street  
PARRAMATTA NSW 2150

Dear Ms Craig,

**InterContinental Hotel Concept Development Application (Stage 1 – SSD 7693) - Insertion of Stage 1A Modification to Transport House to facilitate a temporary function centre (SSD 7693 Mod-2).**

I refer to the above application which has been referred to the Royal Botanic Gardens and Domain Trust (Trust) as part of the public exhibition process.

As a significant landowner directly to the east of the site, which is the subject of this application, the Trust has a particular interest in any redevelopment on this land and its potential impact on the Garden. We welcome therefore the opportunity to comment on the proposal.

We note that this application is a Modification Application only and that any future changes to the building envisaged by this application will require further, separate approvals in which we would also expect to be consulted.

***The importance of the RBG***

In considering the potential impacts of the proposed development on the Garden it is important to understand the nature of the Garden – what it is and has and how it is used.

In essence, the RBG and the Domain form one of Sydney's earliest and most significant public parklands which has been at the centre of botanical collection and research in Australia over the last 200 years. It is of exceptional national heritage significance, historically and aesthetically, because of the outstanding living and preserved collections which are notable for their rarity, diversity, size, and scientific value and now forms part of the Governors' Domain and Civic Precinct.

With its beautiful plant and floral displays, its stunning landscape and position on Sydney Harbour and its proximity to the Sydney central business district, Circular Quay and the Sydney Opera House the RBG is one of the most visited attractions in Sydney receiving over 5 million visitors annually. Any development or activity around the edges of the Garden which compromise the important historic, scientific, and aesthetic qualities of the place are therefore of concern to the Trust.

### ***Potential impacts of the proposed Concept Development Application***

In the context of the above, there are two potential impacts of development on the site that the proposed Concept Plan would allow that are of particular concern – visual impact and overshadowing.

In relation to visual impact, we acknowledged the impact of the proposed development concept is of a temporary nature and not visually dominant against the existing city skyline. However, it would be visible from large areas of the Garden. The building envelope in the application suggests the form and scale of the temporary structure will have a reduced profile and be less intrusive given that it will be constructed off-site using prefabricated material. Nevertheless, the detailed design of the addition is equally important to ensure the successful visual integration with the existing built form in this locality.

We request therefore that any approval for the application should be conditioned to require the detailed design to have a high standard of architectural quality that is sympathetic to their visual and spatial context.

Potential overshadowing is of greater concern to the Trust as the loss of sunlight can have a significant impact on the health and appearance of gardens, botanical displays and individual specimens that are affected.

We have reviewed the application documentation in relation to overshadowing and note that the development concept in the application is fully contained within the solar access planes that apply to this locality and that the proposed building envelopes do not cast any additional shadows over the Gardens. However, as stated in our submission dated 26 October 2017, it is critical that this situation remains and request that any approval for the application makes this outcome an explicit requirement of any future additions.

Should you have any further enquiries regarding this matter please contact our Planning Project Manager, Louise Farley, on telephone 4634 7957 or email [louise.farley@botanicgardens.nsw.gov.au](mailto:louise.farley@botanicgardens.nsw.gov.au).

Yours Sincerely



George Salouros  
Director, Asset Management, Planning and Projects



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