

## Response to Proposed Master Plans and Planning Controls for Pymont Peninsula November 2021 – [REDACTED], 24 Jan 22

### Response Summary

While there are many good aspects in the Pymont Peninsula sub-precinct master plans, I strongly object to the following proposed changes to the planning controls, impact assessment and tower developments:

1. The Hotel tower development for the Star was rejected by the DPIE and IPC in November 2019. Why is this decision being overridden?
2. The existing planning controls are being changed specifically for The Star Casino almost doubling the height restriction and making the FSR for its two towers the greatest in the City of Sydney. Why is the Star being given special planning treatment (see submission file).
3. The SIC for the Metro Station under the proposed Star Tower is being levied to new development that benefit from the new metro station. The Star Tower will unduly received the greatest benefit from the metro station and it seems is being sponsored by other residential and business development. The Star Metro Tower development approval seems to be tied to the new metro station. The Star Metro Tower must be assessed on its own merit and independent the new metro station.
4. Visual impact assessment of the Star Metro Tower downplays the impact on sensitive areas of Pymont, including Union Square and Pymont Bridge West. The height, bulk, and scale of this proposal in the context of the surrounding built environment results in unsightly and unacceptable visual impacts (see submission file).

### Details of Objections to the Proposed Master Plans

Pymont Peninsula Place Strategy Implementation Exhibition discussion paper and incorporated Explanation of Intended Effect

#### **Section 3.3 and Appendix B Sites capable of change**

[REDACTED] is shown as a site capable of change. Unlike the Novotel, this building is residential for over 200 families with strata [REDACTED] protected by 99 year lease (in 1996). How does potential development and renewal on this site contribute towards the up to 23,000 new jobs and up to 4,000 new dwellings forecast under the PPPS?

This was not shown in Sites capable of change as part of the PPPS exhibition in 2020 (Pymont Peninsula Place Strategy 2020) – Figure 5. Nor is it shown in Figure 6. Surely, inclusion of [REDACTED] Sydney [REDACTED] is a mistake.

#### **3.5 The Star and UTS master planning process**

#### **3.6 The Star and UTS: proposed built form controls and public benefit outcomes**

The proposed deregulation of the build form control for the hotel tower proposed for the Star Casino seems to be out of proportion considering the rest of the Pymont Peninsula Precinct. The Star towers will be the only buildings exceeding 60 metres (Figure 3 of Star Visual Impact Assessment). Although the height is revised from that rejected by the IPC and DPIE in November 2019, the height is still almost double that of any existing building in the area and should at least not exceed the RL height of apartments on the ridge to the north of the tower.

The Floor Space Ratio (FSR) proposed by the Star- Hotel Tower is far in excess of any within the City of Sydney let alone Pyrmont. The FSR must be maintained at the DPIE proposal of 4.2:1.

The height and FSR of the UTS tower seem to be more in keeping with the nature of the surrounding area.

### **3.7 Metro sites**

“Any tower development on the site could impact on nearby existing residential development and the important local public open space of Elizabeth Healey Reserve.” – What about the impact on residential buildings adjacent to the Star Casino tower?

### **3.8 Metro sites: proposed built form controls and public benefit outcomes**

The built form and proposed public benefit seems to be for the combined tower and metro station. This site belongs to The Star and its Master Plan should show benefits of the tower not the station. The tower should not include the benefits of the metro station only the tower alone. Why is the Star tower planning controls and benefits mixed with the metro station over which it would be built? Approval of the commercial tower must be independent of public metro station.

The proposed controls for the tower (not the metro station) are far more relaxed than any building site in the area (except the Star hotel tower). The height of the proposed Star-Metro tower is almost double that of any building in the Pyrmont Peninsula (except for the proposed Star Hotel Tower). Why is this exception made for the Star Casino's tower?

The Floor Space Ratio (FSR) proposed by the Star-Metro Tower is far in excess of any within the City of Sydney let alone Pyrmont. Why is the FSR relaxed to 9:1. Even 9:1 doesn't seem to be able to be achieved with the proposed tower with a 32,000 m<sup>2</sup> floor space and 2021 m<sup>2</sup> site area without public footpath. Even if you include these the site area of 3112 m<sup>2</sup> will only achieve 10:1 FSR. How is the 9:1 FSR proposed and why so in excess of existing planning controls?

## The Star Key Site Master Plan – Appendix I Visual Impact Assessment

The Visual Impact Assessment of effect of the two proposed Star Casino Towers seems to show viewpoints that minimise the exposure of the towers to local sensitive points. This assessment seems to have made Visual Impact Assessment errors as follows.

### 9.2 Viewpoint 2: Pirrama Road, Jones Bay Road and Darling Island Road intersection

This visual Impact Assessment seems to have missed the sensitive viewpoint of Darling Island's Metcalfe Park with it's westerly backdrop the historic Naval Buildings, low-rise offices and Star's buildings where the Northern Tower is proposed.

The visual impact on Gibba Park is also missed being a sensitive area with previously unencumbered views





### 9.3 Viewpoint 3: Union Square

“The largest change is due to the South Tower. The tower will appear as a taller, more slender element [than the Star].

Importantly, the proposal will not directly impact on the key visual values of Union Square, which comprise its open space nature and its fine grain built edges.

The following table provides an assessment of the magnitude of the nature of change proposed.”

The viewpoint from Union Square seems to have been specifically chosen to lessen the impact of the proposed Metro Tower. This hides the bulk of the tower behind the close Union Square wall of the Harlequin Inn. A more realistic viewpoint aligns to Union St, which is the view presented to the majority of people resting, crossing or participating in community events in the square. This is shown in the following simulated image with representative tower in relation to buildings of the same distance.

Contrary to the assessment, the proposal **will directly impact** on the key visual values of Union Square!





The assessment in the tables has major errors to make Metro Tower seem to have minimal impact on the visual values of Union Square with its unique mix of local buildings that reflect the 19 century aspect of this valuable space in Pyrmont and Sydney.

Table 8 Viewpoint 3 – Union Square: sensitivity to the nature of change proposed

Factor	Assessment	Level
Type of people	Recreation	Medium
Number of people	Medium	Medium
Social and cultural value of the view	High	High
Visual characteristics	Built form of scale, including verticality, is visible in the view.	High
Sensitivity	High	Medium

Should be valued as "High"

Should result in "High"

Table 8 provides basis for assessment of visual sensitivity for Union Square. Considering the unique nature of its "Built form of scale, including verticality, is visible in the view" the Visual characteristics should be at a "High", not "Medium" Level with the result of a "High" overall sensitivity.

I agree with the result of considerable visual impact derived in Table 9 as the Metro Tower and additions to other Star buildings have **"Major change over restricted area or Moderate change over wide area"** but the duration is **"Ongoing and irreversible"**. Once the Metro Tower is built I do not believe that it is "capable of being reversed"

Should be "High" from Table 8

Table 10 Viewpoint 3 – Measure: significance of visual impact

		Magnitude				
		Dominant	Considerable	Noticeable	Perceptible	Imperceptible
Sensitivity	High	Major	High	Moderate	Low	Negligible
	Medium	High	Moderate	Low	Low	Negligible
	Low	Moderate	Low	Low	Negligible	Negligible
	Negligible	Low	Low	Negligible	Negligible	Negligible

Should result in "High" from

## 9.6 Viewpoint 6: Pymont Bridge

I believe that the report has assumed a convenient view that lowers the visual impact of the Metro Tower. If the view is then from the Western not Eastern end of the Pymont Bridge, the dominant view of the structure is obvious and affects the unique aspect of the bridge and the Pymont Bridge Hotel on Corner of Murray St and Pymont Bridge Rd.

The following of visual estimation the star metro tower provides a better overview of the visual impact on the western apron to the Pymont Bridge showing the overbearing nature of the proposed tower on the streetscape.



Table 23 Sensitivity assessment

Ref	Viewpoint	Type of people	Number of people	Social and cultural value	Visual characteristics	Sensitivity
1.	Pymont Bay Park	Outdoor recreation	Medium	Medium	High	Medium
2.	Pirrama Road / Jones Bay Road / Darling Island Road	Travellers on road	Low	Low	Low	Low
3.	Union Square	Outdoor recreation, in particular local residents	Medium	Medium	High	Medium
4.	Barangaroo	Outdoor recreation	High	Medium	High	Medium
5.	King Street Wharf	Outdoor recreation	High	Medium	High	Medium
6.	Pymont Bridge	Outdoor recreation	High	Medium	High	Medium

Should be  
"High"  
sensitivity

Should be  
"High"  
sensitivity for  
west end of  
bridge

Should include west  
end of bridge.

## DRAFT Pymont Peninsula Design Guidelines

### 4. Metro site east

#### 4.1 Objectives

I do not believe that the stated objectives of the Metro Site East with the Star Casino tower have been met.

a) Provision of an integrated building providing safe, legible and equitable access to the future Pymont Metro Station. **[disputed – Tower does not directly benefit to this]**

b) To allow for a tower above a podium building typology, and to ensure a high quality design which minimises impact on local character through effective control of built form, scale and material use and responds to the urban grain and scale of surrounding buildings, heritage items and heritage conservation areas. **[disputed – metro tower is way out of scale to all surrounding buildings]**

c) To prevent further increase to overshadowing of surrounding public spaces and ensure adequate solar access is provided to existing residential dwellings/apartments. **[disputed – metro tower visual overshadows residential buildings]**

d) Maintain wind safety and comfort in surrounding pedestrian areas. **[not disputed]**

e) To provide active frontages at ground level, whether through pedestrian access to the Metro Station or active shop fronts. **[Metro tower of no benefit to this]**

f) Improve and widen the public domain on surrounding streets as supported by an active transport study. **[disputed – Metro tower of no benefit to this]**

g) To maintain generous view corridors between buildings and minimise adverse visual impacts from the water and surrounding public domain. **[not achieved – metro tower visual impacts are immense]**

h) To provide uses that will maintain and enhance the 24-hour economy in the sub-precinct.

**[disputed – Metro tower of no benefit to this]**

i) To establish benchmarks for ecologically sustainable development and to implement green infrastructure and water sensitive urban design at the site. **[disputed – Metro tower of no benefit to this]**

#### 4.1.1 Public Benefits

It is proposed as part of the uplift available to the sites that the preparation of a study identifying active transport routes and public domain improvements to enable passengers to travel to and from the station entrances and further afield to the Sydney CBD and Blackwattle Bay will be required. This study would be led by Government. **[disputed – Metro tower of no benefit to this]**

#### 4.2.2 Built Form and Design

“12. The podium of the Union and Edwards Street elevations is to be articulated to respond to and sit comfortably within the fine grain character of the existing buildings along Union and Edwards Streets. Refer Figure 4-2. Development is to demonstrate an appropriate relationship to Union and Edwards Streets that:

a) Respects the local character of the area, including the pattern and grain of streets, lanes and buildings. **[disputed – metro tower visual impacts do not respect the local character of the area]**

b) Conserves the existing street enclosure of Union and Edwards Streets. **[disputed – Metro tower of no benefit to this]**

c) Provides a transition in height which complements the local area.” **[disputed – metro tower visual impacts are immense]**