15 April 2010

Chief Executive Officer
Barangaroo Delivery Authority
Foreshore House
Level 3, 66 Harrington Street
The Rocks NSW 2000

Dear Mr Tabart

Planning Institute of Australia NSW Division: Response on the Barangaroo Public Display

The Planning Institute of Australia, NSW Division (PIA NSW) takes this opportunity to respond to the current public display presented by the Barangaroo Delivery Authority within the Old Ports Building at Millers Point. The PIA NSW Urban Design Chapter visited the exhibition on Monday 8 March 2010. PIA NSW does recognise that the project on display is not an amendment to the approved concept plan and that the formal strategic planning, community consultation and community involvement for a development approval on this site is yet to occur.

The Planning Institute of Australia is the peak body representing professionals involved in planning Australian cities, towns and regions. The Institute has around 4,500 members nationally and around 1,300 members in New South Wales. PIA NSW plays key roles in promoting and supporting the planning profession within NSW and advocating key planning and public policy issues. This letter has been prepared on behalf of PIA NSW by members of the Institute.

PIA NSW is aware that the current public display is an initiative of the Barangaroo Delivery Authority to raise public awareness of the site, rather than presenting an opportunity to shape the outcomes of the development on the site. However, the Barangaroo Delivery Authority has invited feedback on the overall design concept of the Barangaroo development, and this letter provides PIA NSW’s comments on the display proposal.

It is the view of PIA NSW that the planning and development of the Barangaroo site warrants the application of best practice in the social, economic and environmental realm. This is due to both the significant scale of the development proposed and the prominence of the site within Sydney Harbour. In this regard PIA NSW questions in particular, the proposal for private hotel development within Sydney Harbour waters and the precedent that an approval for this type of development may set for other waterfront sites in Sydney.

Process and Planning

- The NSW Government approved a draft Concept Plan for the Barangaroo site in February 2007. The approval was for 388,300 square meters of floor space which included a maximum of 97,075 square meters of residential floor space.
In October 2007 the NSW Government produced a statutory master plan instrument that was established to guide the urban renewal of Barangaroo known as the ‘Consolidated Concept Plan’.

In September 2008 the NSW Government released a shortlist of proponents to develop Stage 1 which included development blocks identified as 1, 2, 3 & 4 in the Consolidated Concept Plan along with the supporting infrastructure and design and development of the adjoining public domain.

In February 2009, the NSW Government approved an additional 120,000 square meters of commercial floor space for the Barangaroo development.

Three selected proponents submitted schemes in March 2009 and were shortlisted to two in August 2009. Final bids were lodged in November 2009 and Lend Lease (Millers Point) Pty Ltd was selected to develop Stage 1 of the development on 20 December 2009.

The Barangaroo Delivery Authority has advised that “while most of the winning plan is consistent with the existing Concept Plan approval some aspects will require amendment as part of the formal planning process”.

In February 2010 further Stage 1 amendments to the ‘Consolidated Concept Plan’ were submitted to the Director General, Department of Planning, as part of the ‘Major Projects Assessment’ for the site. The amendments include “the proposed Hotel building west of the Barangaroo site’s western edge, overhead pedestrian bridges and other ancillary works, encroachment in the RE1 zone, additional GFA in Block 1 and additional height in Blocks 1-4”. PIA NSW is of the view that all of the proposed changes are potentially significant including and in particular, the proposal for private hotel development within Sydney Harbour waters.

**Land Use Planning Issues**

- The current proposal appears to be focused on the development of the site in isolation to the rest of the CBD. Integration of this site with the rest of the CBD is critical. International best practice would suggest the establishment of a detailed strategic plan to guide future development of the entire Barangaroo site and its links to the wider CBD area.

- The City of Sydney as an adjoining local government authority and landowner, will need to address issues created by development of the Barangaroo site and therefore should be a key partner in the vision. The interface issues with adjoining streets will be critical, including activating and improving Hickson Road, the interface with Shelley Street, and shadow impacts on the Shelley Street Plaza, Westpac Plaza and King Street Wharf.

- It is understood that the proposal is to retain the Stage 1 development site in a single ownership and not break it down into a finer grain of blocks separated by public streets. This raises some concerns as the current proposal to place almost all of the buildings, roads, lanes and pedestrian routes over the top of a large multi level car park will restrict incremental change to the development and possibly sterilise future changes to this part of the City.

- It is argued that a fundamental requirement of any large project on a public site is the provision of a clearly demarcated public domain. A project this large should include areas of public domain as well as shops and cafes. The current Stage 1 plans indicate a ground level with large blocks of retail and other uses, but with no obvious public streets. It is argued that the organisation of the ground floor plans requires thorough review to establish clearly demarcated areas of public domain.

- The potential lifelessness of the development could perhaps be solved by taking a new road off Hickson Road and extending it around the Barangaroo development site and linking it back to King Street. This would potentially enable more buildings to have street addresses and also enable the development of more cross streets and lanes between Hickson Road and the new ‘boulevard’. There will also be a need for improvements to Hickson Road and also to create improved access to the site from other parts of the City, including Millers Point, Wynyard and Circular Quay.
• It is possible that a better overall return (spatially, economically and socially) would be achieved for the community if the public domain elements of an amended scheme, including the road network, were built first and a more competitive, longer time frame tender process for separate developable lots was adopted.

**Social Issues**

• The focus on commercial rather than residential floor space is questioned. It is possible that a lifeless office district could be created with little or no activity after 7pm, due to the small amount of residential development proposed. For an international City, Sydney has very few residents living in the CBD and in the interests of long term sustainability there should be a focus on decentralising employment out of the CBD.

• The social, economic and transport impacts of the proposal need to be identified and justified including the quantum and mix of commercial retail and hotel uses proposed. Strategies should be developed to encourage visitors to the site during the daytime and evening to achieve a feeling of activity and sense of place.

**Transport Issues**

• The traffic implications of the proposal (mix of land uses, quantum of floor area) need to be considered prior to any approval of the development proposal. The current proposal will generate a large volume of transport movements (rail, pedestrian, vehicular, bus, bike) within a City infrastructure that is barely coping with current demands. Any future development application submission for the site should include a transport plan to demonstrate that there is sufficient public transport available to support the proposed development.

• The ferry terminal concept is supported, but to be effective it will need to be designed as an integrated transport hub which facilitates mode interchange between ferry and rail, bus and pedestrian flows. All facilities including ticketing will need to be carefully considered and designed.

**Building Issues**

• The height of the proposed hotel and tower buildings do not appear to comply with the Consolidated Concept Plan for the site, as clarified by the recent submission of the Stage 1 amendments to the ‘Consolidated Concept Plan’ for the Major Projects Assessment. The two tower buildings appear to be significantly larger than other CBD towers and also appear to have very large building footprints.

• The excessive height of the buildings could cause over shadowing for neighbouring buildings and large areas of public space including King Street Wharf, King Street foreshore, recent developments in Shelley Street, and Shelley Street Plaza and even parts of Pyrmont.

**Public Space Issues**

• The size and shape of the Headland Park is questioned. This part of this City is very isolated and its location will make access difficult. There will be limited opportunities for passive surveillance. Clarification is sought about which groups are expected to use this site and how will it be accessed.

• A public pier on the waterfront may be acceptable as a landscape feature, but it is not considered to be appropriate to use the pier as a development site. The approach will set an unacceptable precedent for future development of Sydney's foreshore, will lead to privatisation of parts of the harbour and create a dominant visual impact. The building is likely to have a significant impact on the "public pier" on which it will sit. The hotel building is likely to require a prominent hotel entry (and possibly covered porte cochere), emergency services and service vehicle access, fire stairs and lift access, restaurants and cafes.
• The proposal is for the waterfront pier to be within the Barangaroo public domain. However, waterfront piers in Sydney (such as Finger Wharf and Walsh Bay) do not tend to have public access due to security concerns and servicing requirements.

**Waterway Issues**

• The distance between the proposed landmark building (on the pier) and the Pyrmont shoreline would be reduced to less than 200 metres, which could make ferry and boat operations into Darling Harbour more hazardous.

• The public display appeared not to provide detail of climate change issues and information as to how the development would deal with issues such as rising sea levels.

In conclusion, PIA NSW submits that the NSW Government should demonstrate leadership in planning best practice principles for the development of the Barangaroo site. The way in which the NSW Government approaches the statutory planning process and detailed impact assessment for Barangaroo will set a precedent for other waterfront sites in Sydney including Glebe Island and White Bay. In consideration of this, the proposal for private hotel development within Sydney Harbour waters should be questioned due, in particular, to the precedent that an approval for this type of development may set for other waterfront sites adjacent to the harbour.

The Institute appreciates the opportunity to make comments and would be pleased to provide further input as the project develops.

Yours Sincerely

Tony McNamara
NSW President