Planning Institute of Australia (NSW Division)
Submission: Barangaroo (formerly East Darling Harbour): MP06_0162 MOD 4 (Hotel development, additional GFA and Height)

The Planning Institute of Australia (PIA) 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.

Introduction

The Planning Institute of Australia (NSW Division) welcomes the opportunity to comment on the proposed amendment for the approved Concept Plan for Barangaroo on Public Exhibition between 11 August 2010 and 10 September 2010. This submission has been prepared by members of PIA on behalf of the Institute.

The Institute has made a previous submission on the Barangaroo proposals directly to the Barangaroo Delivery Authority, following the on-site public display within the Old Ports Building at Millers Point, earlier this year. This submission was prepared as a letter to the Chief Executive Officer of the Delivery Authority, dated 15 April 2010. A copy of this letter is included as an Attachment to this submission.

Institute members have also more recently attended the Community Forums on Barangaroo organised by the Barangaroo Delivery Authority in May 2010 and also the current public exhibition display at the City of Sydney Council, One Stop Shop.

The comments below relate to the proposed Amendment to the Concept Plan for Barangaroo currently on Public Exhibition.

Position of the Institute

The Institute considers 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 proposed development and also the prominence of the site within Sydney Harbour. In this regard the Institute 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. The Institute is not aware of such a development being approved anywhere in the world. The Institute considers that such a
fundamental change to the approved Concept Plan is not an amendment, but a significant change and should be viewed as a new Concept.

**Process and Planning Background**

The NSW Government approved a draft Concept Plan for the Barangaroo site in February 2007. The approval was for 388,300 square metres of floor space which included a maximum of 97,075 square metres 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 of the Barangaroo project, 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 metres of commercial floor space for the Barangaroo project. The Institute notes that an increase of some 30% in floor space was a significant change.

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 advised at the time 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”. The Institute considers that the ‘amendment’ referred to in this context would mean changes of a relatively minor nature that are not significant. However, the Institute notes that proposed amendments currently on public exhibition are significant and warrant the preparation of a new Concept Plan, rather than an amendment to the existing one. The Institute is not aware of any previous part 3A amended Concept plan Application that has requested significantly increased floor space and building heights, a proposed large building in a public area, and that has located private uses in an area identified for public recreation.

**Consultation**

The Institute is interested in the relationship between the consultation processes held to date, and the design outcomes as a result of this. There has been a public display with good visitation, both online and in person and there are also a number of forums on the Barangaroo Delivery Authority’s website. There has also been a design workshop held recently at the Opera House. However, the Institute has yet to see how all this consultation is informing the design. There does not appear to be any information available to demonstrate how all this participation by the community is being considered. It is important to recognise that a considerable amount of time has been expended by the community to have an input into the ideas for the Barangaroo development and in return the Delivery Authority and /or developer should demonstrate how this has been considered, incorporated or why it is disregarded. A clear and transparent response to the consultation issues raised should be required by the Department of Planning.

**Urban Design Analysis**

The urban design analysis is not considered to be comprehensive, but instead quite vague and simplistic. An analysis for a project this complex should be thorough and comprehensive, extending to the full catchment of this precinct, which is at least the western portion of the existing CBD.

The Institute does not consider that the site analysis is adequate. Rather than a very thorough analysis of existing streets and potential connections, there are concept sketches of the city grid
and ‘fan’ principles that are not related to the realities of the site. There is no ‘fan’ pattern currently within the CBD and whilst the grid of the city is noted, it is not actually integrated into the site.

Most plans in this application do not show the plan in context of the wider area. Reference to the key plan, ‘Public Places and the Public Realm Plan’ (pages 8 and 9 in the Streetscape and Public Domain section), does not indicate adjoining streets. For example, whilst Margaret Street (west) is indicated on page 9, Margaret Street itself is not shown and it is not demonstrated that the new street does not align with the existing Margaret Street. Margaret Street is the only street that can link and it is not aligned. This is a fundamental principle. This means that when looking west down Margaret Street, one will see a building not a view corridor down to the harbour. This is contrary to the best practice principle of good urban design.

Key Issues

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. Every opportunity to connect to the city must be made.

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 concern 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 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.

**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/travel 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.

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. Public transport needs a connective public domain of public streets.

**Public Domain**

The plan is generated by buildings not public domain. There is a fan of buildings to maximise views and the streets and public domain is then set out. However, the Institute considers that the design process should be the other way round, with the areas of public domain established first and then the buildings added. A fundamental flaw is that the one existing street, Margaret Street, which can link to Barangaroo, is not continued as a vista to Barangaroo. The new street extension does not align with Margaret Street. Rather Margaret Street will terminate on a tower building. This is a major lost opportunity to connect the two places. The best connections to the CBD should be made and extended throughout the site and then the buildings located. There are no through streets and the Institute considers that this is not acceptable for such a large inner city precinct.

Barangaroo should be treated as a precinct that is part of the broader city. However, it appears to be treated in this application as an individual development site with internal functions and private type connections rather than public streets.

Much of the public domain is not memorable. The original competition winning scheme had a linear park that extended throughout the entire precinct and it was the strong public domain idea that was more dominant than individual buildings. The current scheme is in reality 3 discrete sectors with an artificial park based on an 1800’s form, a low rise central precinct and a high rise precinct.

The size, shape and levels of the Headland Park are questioned. This part of this City is very isolated and its location and levels 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 for a high rise building. 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 proposed 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.

Built form

The excessive height of the proposed commercial towers and hotel building will 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. The hotel over the water in particular creates very significant shadows at the following times:

- 21st March – 2 – 4pm
- 21st June – 1 – 4pm - mid winter period – all afternoon impact
- 21st September – 11am – 3pm – mid morning and all afternoon

These are the times when sun to the public domain in a CBD location is of fundamental importance. Sun at lunchtime both during the weekend and during the week will greatly improve the amenity of the waterfront.

While the application notes that such a central site requires high density, the plan actually has low scale housing on the water, with very high towers in other places that overshadow the public domain. It should be possible on such a large site to distribute the built form to get the density and not overshadow the public domain.

The Institute consider that the floor plates and heights of the office towers are excessive and that the large buildings should be well setback from the waterfront. In addition, the hotel over the water is not supported.

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. Consideration should be given to climate change issues and how the development would deal with issues such as rising sea levels.

Conclusion

The plan is not an improvement over the previous schemes in any significant way. The Institute does not support this development proposal in its current form. There is therefore no justification (or merit argument of public benefit) to depart from the approved Concept Plan.

Specifically:

- The hotel over the water should be rejected.
- Non public uses should not be located in areas designated for public recreation.
- A public domain comprising a connected network of public streets linked to the CBD should be introduced.
- Building heights should comply with the approved Concept Plan.
- The footprint of the commercial towers should be reduced.
In conclusion, the Institute 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 welcomes the opportunity to make this submission and would be pleased discuss any aspect of the points raised in the submission with the relevant Officers and provide further input as the project develops.

Tony McNamara
NSW President
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