

Andrew Pickles



13 August 2019

Independent Planning Commission NSW
Level 3, 201 Elizabeth Street
SYDNEY
NSW 2000

BY EMAIL: ipcn@ipcn.nsw.gov.au

Dear Commissioners

Re: The Star Casino Re-development MOD 13

As a resident of Pymont affected by the proposed re-development of The Star Casino I would have liked to address the Commission in relation to it, but as it is most unlikely that I can be available that day I wish to make the following written submission.

Height, bulk and scale

1. The proposed tower is completely inappropriate in height, bulk and scale with the height and scale of Pymont. It has significant adverse visual impacts on Pymont as well as precincts beyond including from Darling Harbour, the waterways of Sydney Harbour and the Pymont Bridge. In my opinion, the Department's assessment report makes an excellent assessment of the impact of the proposal in terms of its inappropriate relationship to the surrounding development. The assessment against the Land and Environment Court's planning principle in *Veloshin v Randwick City Council* [2007] NSWLEC 428, is also to be commended.
2. This reason is alone a more than sufficient basis to refuse the application.

Justification for residential uses

3. While the Department's assessment recommends rejection of the proposal in in respect of scale, very little has been said about the lack of strategic justification for the significant residential component of the proposal. The site is zoned B3 Commercial Core under Sydney LEP 2012. While I acknowledge that under the now repealed, yet saved Part 3A, prohibited development may still be approved, such development should only be approved where there is a strong justification for it. The proponent makes no arguments to support the residential component.
4. Given that the height and scale of the proposal is unacceptable and that the majority of the height is made up of residential floors, it must follow that the residential component is unjustified.

5. As I had indicated in my earlier submissions to the Department, a much shorter tower comprising a hotel only, subject to design, would probably be unobjectionable.

View impacts

6. View impacts from my apartment have been assessed by the Department in the View Impact Assessment, Annexure I, p 129. I would concur with the Department's assessment that the view impacts are moderate. I also accept that my apartment has significant views to the north over the water and that the view depicted is a secondary view. However, I stress that the reason for making the submission was not so much a concern for views from my apartment, but more for all the east facing apartments in Sugar Dock (4 Distillery Drive), of which there are 40 with a single eastern orientation comprising a corridor view between Stonecutters and Distillery Hill. My apartment is on level 4 and accordingly the intrusion is principally loss of sky. However, as elevation increases in the building the impact on views of city buildings will worsen. The impact on the views of the oversized tower looming between the buildings for these apartments will be more significant, obscuring the attractive city building views with a single oversized and dominant element.
7. The photo montage (Fig 67 at page 140) prepared by the proponent overlaid over the photo I took from my living room amply displays the discordant scale relationships. The current buildings that make up The Star are in the middle ground view and appear no taller than the CBD buildings. The proposal, by contrast would be completely out of scale.

Conclusion

I commend the Department's assessment report and I hope that the Commission agrees and refuses this proposal.

Yours faithfully



Andrew Pickles