

24 June 2020

The Hon. Rob Stokes MP
Minister for Planning and Public Spaces
GPO Box 5341
Sydney NSW 2001

Dear Minister

Pitt Street South Over-Station Development Stage 2 Detailed Design and Construction

The proposed residential tower over the planned Pitt Street South Metro Station represents a gross overdevelopment of the site that will severely erode the amenity of neighbouring homes and negatively impact on the public domain. I ask you to ensure that it is refused.

The Department of Planning, Industry and Environment imposed requirements on the detailed design application to comply with the approved concept plan, and maximise opportunities to protect the residential amenity of neighbours and Hyde Park. These obligations have not been fulfilled.

Impacts on Neighbours

Proposed impacts on homes in the Princeton Apartments are devastating. The proportion of apartments that would receive two hours of sun between 9am and 3pm during mid-winter would drop from 46.6 per cent to 5.2 per cent. This is in clear breach of the Apartment Design Guide standards.

The guide standards limit solar access loss where less than 70 per cent of apartments currently receive the minimum two hours of mid-winter sun to reductions of no more than 20 per cent as a result of a new development. The guide also requires a minimum 24-metre separation between habitable rooms for developments over 25 metres to protect amenity including visual and acoustic privacy, natural ventilation, sunlight and daylight access and outlook. The proposed separation is less than half of this.

Proposed louvres along the southern façade of the building fail to resolve privacy concerns for Princeton Apartment residents because the louvres do not extend across the living room windows of the southern elevation of the proposed tower. This is in breach of the Apartment Design Guide section on visual privacy (3F-1).

The breaches to the Apartment Design Guide clearly demonstrate that the proposed detailed design grossly fails to comply with conditions of consent: B3 and A24, which require the development to maximise winter sun and amenity of the Princeton Apartments. The application should be rejected on these grounds.

Views of St Mary's Cathedral from Century Tower would be eliminated under the proposed development despite requirements to consider opportunities to retain these views. No attempt has been made to comply with this condition.



Failure to protect any view of St Mary's Cathedral from Century Towers is a breach of consent conditions A24.

Environmentally Sustainable Development

A large number of homes in the proposed development will have substandard environmental standards and need to rely on artificial lighting and heating. The proposed building fails to comply with the Apartment Design Guide's requirement that at least 70 per cent of new homes have more than two hours of mid-winter sun between 9am and 3pm in the living room, with around only 50 per cent achieving this standard. Furthermore the development would exceed the guide's limit of no greater than 15 per cent of apartments receiving no solar access during mid-winter.

The devastating overshadowing of and insufficient setbacks with the Princeton Apartments caused by this development will significantly cut the environmental performance of Princeton Apartments, resulting in the proposed development having a massive detrimental impact on environmental sustainability. The proposed development will force a large number of homes in the Princeton Apartments to use artificial lighting, heating in winter and due to lost ventilation, air-conditioning in the summer. These outcomes make any claims about ecological sustainable development ridiculous.

The proposed development fails to achieve requirements to demonstrate ecological sustainable development or achieve national best practice sustainable building principles for improving environmental performance including energy efficient design.

Hyde Park

The development application failed to take the opportunity to prevent new overshadowing of Hyde Park in mid-winter.

Hyde Park provides very rare inner city open space, which is heavily used by residents, workers and visitors. This vital open space must meet large number of city residents' needs for open green space and passive recreation. The great majority of these residents live in apartments and have no private open green space.

Hyde Park's amenity relies on sun in the colder months and the Hyde Park West Sun Access Plane's aim is to end the progressive shadow creep caused by progressive city developments over a number of years.

Introducing new shadowing of Hyde Park, particularly over the colder months, is in breach of the access plane and unacceptable, and must be rejected.

Transparency

The environmental impact statement has conflicting assertions on compliance with the approved concept plan. Some parts state that "the proposed development sits within the approved concept envelope" while others refer to "minor exceedances... outside the approved envelope". It is difficult for the public to understand the full extent of impacts of this application and more information is needed before the community can be expected to provide meaningful comment.

The proposed overdevelopment with devastating impacts on the homes in the Princeton Apartments are unacceptable.

I ask you to protect the residential amenity of adjacent homes and reject the proposal.

Yours sincerely

A handwritten signature in black ink, appearing to be 'AG', written in a cursive style.

Alex Greenwich
Member for Sydney