ETHOS URBAN

24 March 2022 2200827

Ms Sarah Waterworth Manager Eastern District Department of Planning and Environment 4 Parramatta Square, 12 Darcy Street Parramatta NSW

Dear Sarah,

PYRMONT PENINSULA SUB-PRECINCT MASTER PLANS - REQUEST FOR INFORMATION

This letter has been prepared by Ethos Urban on behalf of The Star Entertainment Group Limited (The Star) in response to email correspondence from the Department of Planning and Environment (DPE) dated 25 February 2022 issued following a meeting held with the DPE and The Star and its project team on 21 February 2022 in relation to The Star's submission prepared to the Pyrmont Peninsula sub-precinct master plan. For a greater appreciation of the site and its constraints, a site visit was undertaken on 15 March 2022.

In its correspondence and in subsequent meetings the DPE requested The Star provide the following:

- Detail around the existing and proposed GFA on the site;
- Further detail on the constraints affecting the proposed hotel site; and
- · Public benefit offer.

The above matters are explored further in this letter.

The letter is also accompanied by the following:

- Wind Advice prepared by WindTech (Attachment A); and
- Ritz Carlton Operational Requirements (Attachment B).

The revised FJMT setbacks have been revised to provide an average weighted setback for the tower, as well as a 'reverse podium' before the tower meets the podium. The Star seeks support for this revised setback approach to allow some flexibility to be afforded mindful of a future design excellence process. Detailed impact assessment and suitability will occur at that stage. The Design Competition process will include City of Sydney's (CoS) representation in the evaluation process and the preparation and endorsement of the Design Briefs.

1.0 Proposed planning controls

We are of the opinion that detailed design considerations should not be determined at this early stage of the master planning process, specifically items such as podium heights and setbacks – which should not be constrained at this early stage of the process without the benefit of a detailed concept determined through a design excellence process.

The Star Mod 13 proposal which was subject to a Design Competition provided similar podium heights to those proposed by FJMT as part of the PPPS master planning process, it also provided a similar form in terms of setbacks – with a reverse podium and a tower form coming back to the site boundary, as shown in **Figure 1** below. The DPE Assessment Report and the IPC determination (including independent peer reviews) found no issue with this approach. We are of the opinion that the established controls should not artificially constraint architectural innovation and a site-specific response to conditions at this early concept stage of the process, without the technical analysis to support it.



Figure 1 Mod 13 tower form

Source: Mod 13 Environmental Assessment Report (DPIE), FJMT

1.1 Gross floor area and height

A breakdown of the GFA and height elements proposed as part of The Star's Master Plan is provided in Table 1.

Table 1 Existing and proposed GFA/Height

Table I Existing	and proper	sed GFA/Height				
	Existing GFA (sqm)	Proposed additional GFA (sqm)	Proposed total GFA (sqm)	Existing height (RL)	LEP (m) Height	Height proposed (RL)
Site area	39,206sqm					
Existing approved GFA	139,998sqm (as per Mod 14)					
L5 Rooftop Dining, Wellness and Event Space	0sqm	2,500sqm	2,500sqm	RL 29.80	28m	RL 35.30
Pirrama Rd Dining and Retail precinct	0sqm	1,500sqm	1,500sqm	RL2.80 (GF RL of Pirrama Road)	28m	RL 13.00 (to floor level of L1)
6-star hotel + ancillary uses	6,177sqm	19,923sqm	26,100sqm	RL 23.45m (top of parapet), RL 34.81m (top of plant)	28m	Podium: 35.30 Tower: RL 110
MUEF & associated facilities	6,889sqm	1,311sqm	8,200sqm	RL 40.28 RL 38.8 (Existing Plant Area)	28m	RL 51.50
Union Street and Edward Street addition	0sqm	Union St Corner: 122sqm Edward St Corner: 98sqm	220sqm	0	28m	Union St Corner: RL 23.10 Edward St Corner: RL 19.80
			38,520			

These are shown in the attached Figures below:

Based on the approved GFA on site (Mod 14) of 139,998sqm (FSR of 3.57:1 over a site of 39,206sqm), The Star now seek and FSR of 4.55:1 to allow a total of 178,518sqm of permissible GFA.

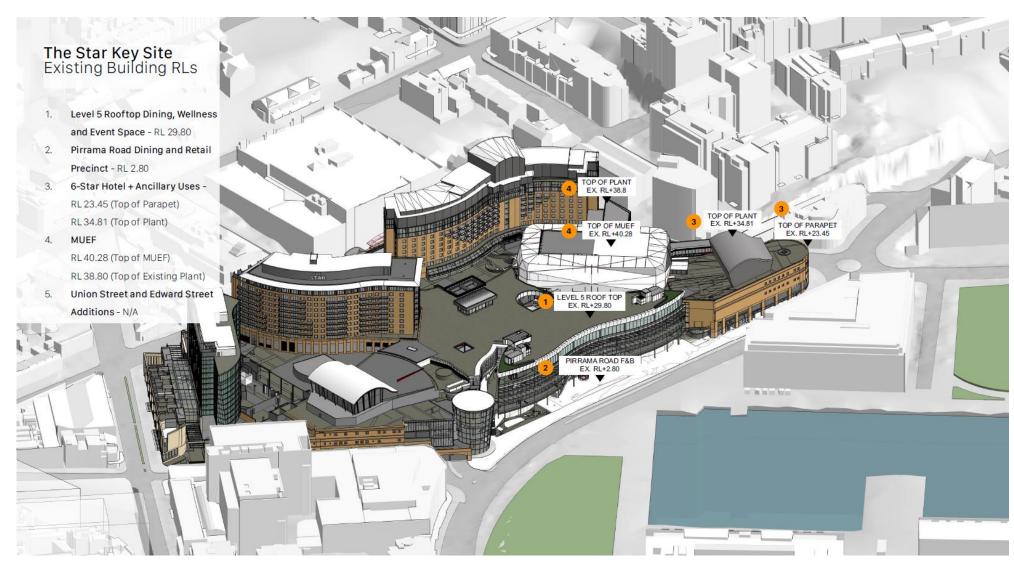


Figure 2 Existing building RLs

Source: FJMT

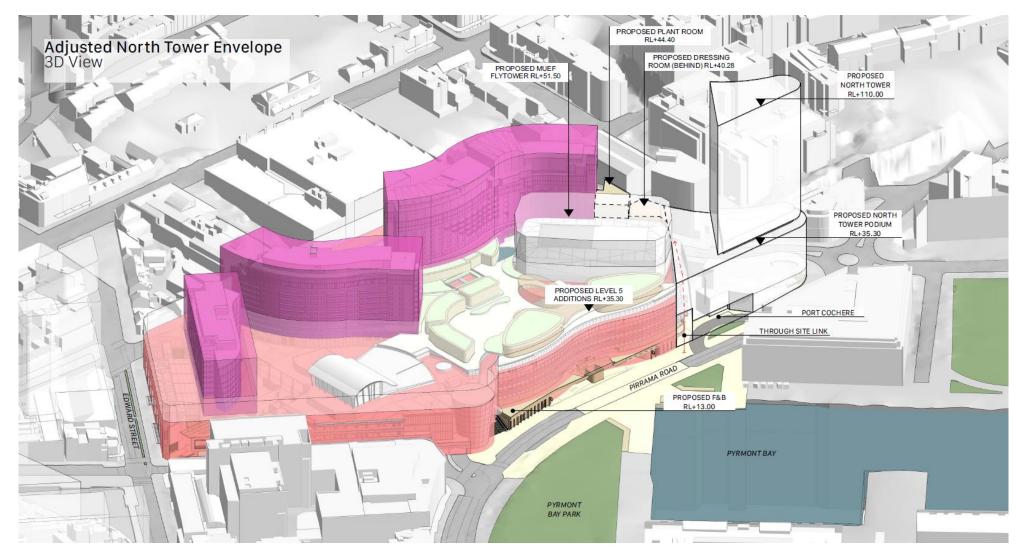


Figure 3 Proposed building RLs

Source: FJMT

1.2 North Tower setbacks

Further exploration of the setbacks has been undertaken since The Star's original submitted Master Plan documentation. The following 'average weighted' setbacks are proposed for the North Site.

- 3m average weighted tower setback (boundary to solid line) with 1m minimum tower setback (boundary to dotted line) (refer to **Figure 4**)
- 7m northern setback and 4m to Jones Bay Road / Pirrama Road to the first level above podium for a minimum height of 6m (refer to **Figures 5** and **6**)



Figure 4 North Tower – tower setbacks plan



Figure 5 North Tower – first level above podium setback Source: FJMT

Adjusted North Tower Envelope Elevation Diagram

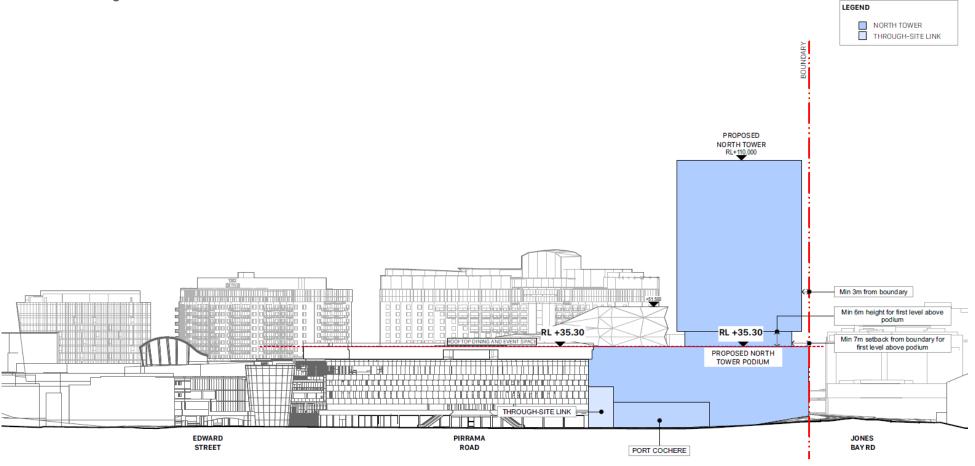


Figure 6 Envelope – elevation

Source: FJMT

2.0 Constraints affecting the Northern Tower site

The Star Sydney site is a complex 'living site' that is Sydney's largest single site employer. Any redevelopment of the site needs to be sympathetic to the existing, working fabric of the building without interruption of existing operations. It has, over the years, seen over \$1 billion invested into it becoming Sydney's premiere tourist, entertainment and dining location.

As noted previously, any development on the site must be mindful of this and be delicately 'stitched' into the facility. Key items for consideration are:

- Retention of the existing lift core is <u>not</u> a key driver for the Star proposal; however it is located in the only realistic and feasible position at this part of the site. Therefore, re-using the existing infrastructure makes sense from a costing, operational and sustainability perspective.
- The location of the North Site tower is positioned above a major through-site light rail and vehicle corridor. It is also immediately contiguous with the bus drop off areas that continue through to Pirrama Road, north of Jones Bay Road as well as other major servicing infrastructure.
- The presence of the light rail corridor, busway and loading dock impose challenges around the grounding and construction of the tower form. The proposed structural solution would work around the <u>existing</u> constraints on the site to provide the required structural support for the building.
- The central building stability core has been positioned away from these constraints around the location currently
 occupied by the fly-tower and Events Centre goods lift. There is an opportunity to combine the loading and
 servicing arrangements of the Multi Use Entertainment Facility (MUEF) and North Tower hotel to minimise
 impacts, noise, traffic and servicing issues. There are no feasible alternatives for the location of the main core
 in this area north of the Light Rail line.
- The position of the southern extent of the tower enables the structure to cantilever to the south over the proposed podium structure whilst avoiding the impacts associated with the existing transport and operational requirements of the Casino.
- Future works associated with the tower will require complex construction sequences and temporary works allowances to enable the forming and support of the cantilevered extents of the structure.
- The limited achievable and practical positions of the structural elements below, will have impacts on the design and planning of the tower floorplate above.

The structural considerations are demonstrated in Figures 7 to 9 below.

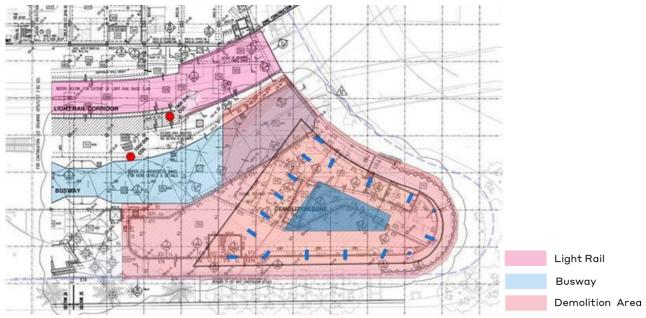


Figure 7 Tower Support – B2 – Top of Podium

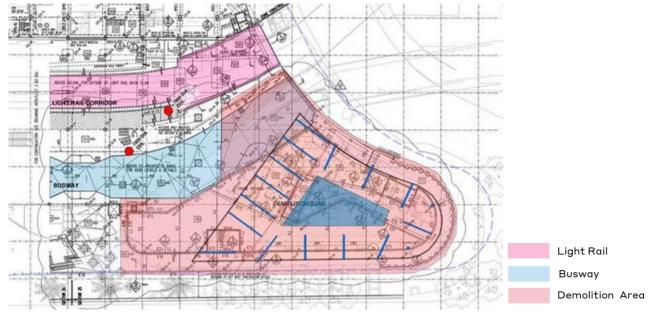


Figure 8 Tower Support -Top of Podium to roof

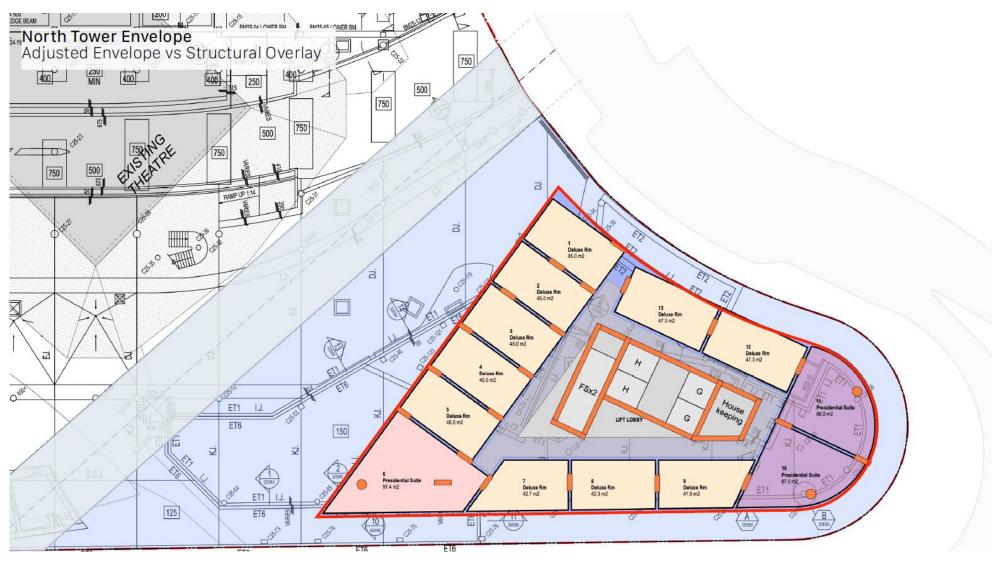


Figure 9 North Tower Envelope - Adjusted Envelope vs Structural Overlay - Structure (currently within existing basement) indicated in orange.

2.1 Tower setbacks

The following items were considered in the development of the building envelope which accompanied The Star's submission to the draft sub-precinct master plan:

2.1.1 Wind

- The Wind Report prepared by WindTech that accompanied The Star Master Plan concluded future development on the site would incorporate several design features to mitigate the wind effects, which included:
 - Tower podium northern and southern setbacks;
 - Existing dense tree planting; and
 - Awnings over the future porte-cochere and separately on the northern <u>corner</u> of the podium form.
- Further, the attached review (**Attachment A**) of the DPE proposal provided by Windtech indicates that the proposed setbacks and open to air through-site link would result in unacceptable wind environments within the through-site link.

2.1.2 Comparison to Mod 13

• The Modification 13 proposal included lesser setbacks than those proposed as part of the Northern Tower setbacks of **Figures 4** and **5**. These setbacks were considered appropriate throughout the assessment phase of Modification 13 and therefore there is no reason to consider that the proposed increased setbacks are not appropriate.

2.1.3 Requirement for a 6 star hotel

- The tower footprint proposed by the DPE which comprises significant tower setbacks will restrict the viability of
 a six-star hotel on the site which requires minimum 50sqm rooms of regular size, each requiring a quality view
 and amenity. Figure 10 shows the regularised layout of the Star proposal (left) against the irregular DPE tower
 layout and a test fit for a 6 star hotel.
- Attachment B is provided for the benefit of DPE and details the operational requirements of the Ritz Carlton Hotel. It notes, amongst other things, a requirement for 50sqm rooms which can be met in the FJMT proposal.

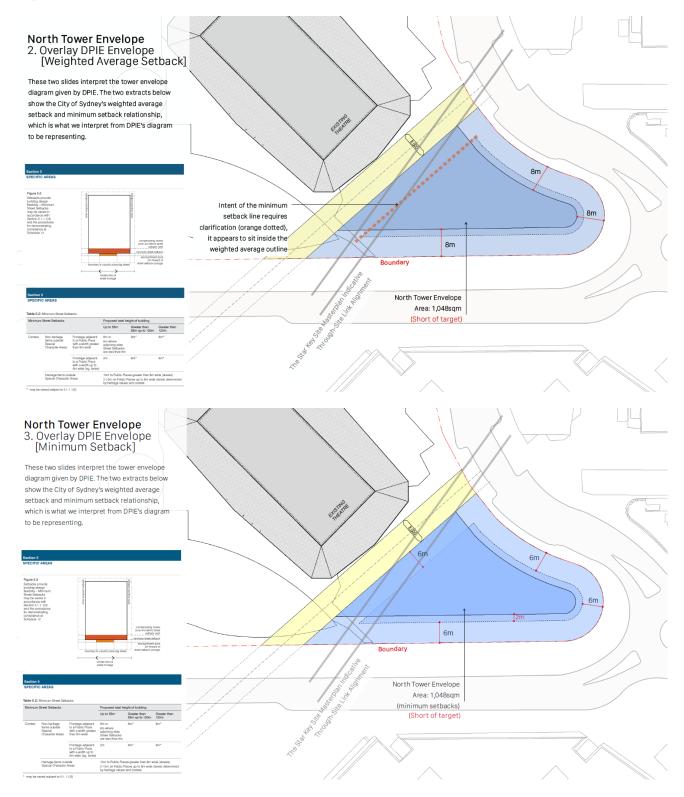


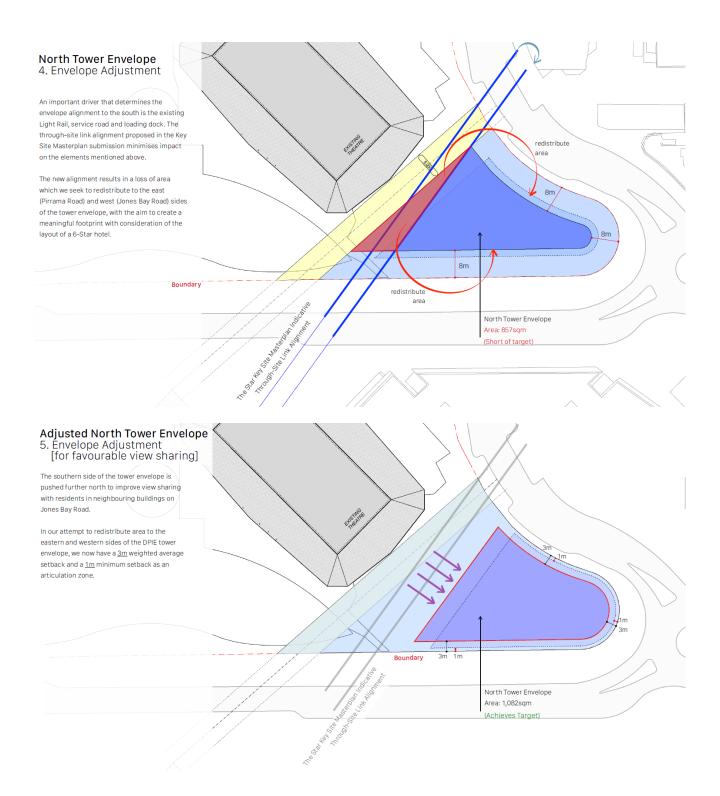
Figure 10 Tower analysis – Star proposal and DPE proposal (FJMT test fit) Source: FJMT

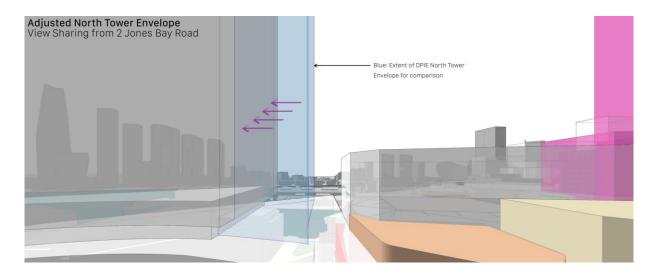
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2.1.4 Test fit

The following sequence of images by FJMT illustrate the process undertaken to determine the suitable tower location and setbacks that aligns to the CoS weighted average setback provisions, mindful of the spatial requirements of a 6-star hotel.







2.1.5 Design Excellence Process

- The Star have committed to a Design Excellence process, as it did with Mod 13, with the involvement of CoS and the SDRP.
- It is not appropriate at this early stage in the master planning process to unnecessarily inhibit design excellence without a thorough understanding of the issues and opportunities that may be presented in any one scheme.

Regardless, the scheme has been refined since the initial Master Plan submission to provide greater setbacks than that previously shown. This is provided at **Figures 4** and **5**.

2.2 Podium height

• The Star propose to retain the originally proposed podium height of RL 35.30m. This is consistent with that put forward in Mod 13, which included additional facilities well above that RL. This is shown in **Figure 11** below, which shows the Mod 13 podium profile in red, the Mod 13 proposed RLs are shown in purple text.

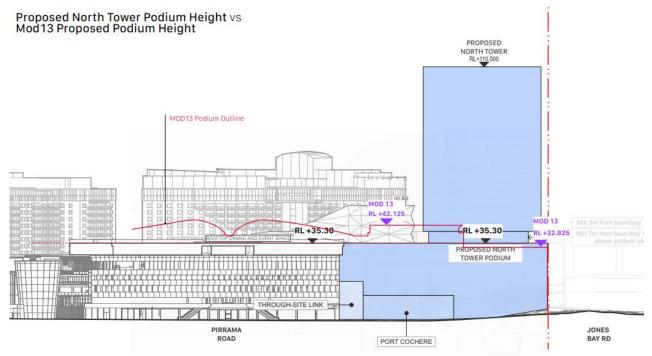


Figure 11 Place Strategy Proposal and Mod 13 comparison Source: FJMT

- The podium height proposed in Modification 13 was deemed appropriate for the following reasons (as noted within with the DPE assessment report):
 - The Department considers the proposed podium addition integrates well with the design of the existing building, is a modern architectural feature and organic form that enhances the visual appearance of the building.
 - Through its sloping recessive form and orientation, this addition would not appear visually dominant or imposing in views from the public realm and would not adversely overshadow the surrounding public domain and open spaces.
 - The Department notes that with the exception of the Ribbon elements the new podium height is largely
 within the 28m LEP height limit and considers the form and scale of the new podium relates well to the grain
 and scale of the residential buildings to the west on Jones Bay Road.
 - Therefore, the Department considers the form and scale of the proposed changes to the podium, together
 with the introduction of the Ribbon Feature, to be acceptable, as these are sympathetic to the local Pyrmont
 context and enhance the visual appearance of the building.
- The proposed podium height only deviates from the Modification 13 podium height by 2.5m, and while it exceeds the 28m LEP height limit, the exceedance has been considered appropriate by the DPE.
- The height of the podium will enable sufficient area to provide the requisite ancillary uses to the 6-star hotel a requirement in the Place Strategy for this site. Uses comprise retail, food and beverage, sports bar, ballroom (including pre-function space, terrace, kitchen amenities), pool and terrace.
- There will be some elements above the podium level such as shade structures or some localised F&B outlets, as per the existing Star podium level.

2.3 Through-site link

The Department have previously identified a desire to provide for a through-site link that is open to the air and located in alignment with the harbour foreshore. The Star are unable to support such commitments for the reasons stipulated below.

- Aligning the through-site link with the harbour foreshore line is notable in its intent, however is not achievable
 with the existing structures on site comprising the light rail corridor, existing service road as well as bus and
 coach parking on Basement Level 2.
 - The service road also provides an underground connection under Jones Bay Road to Pirrama Road which
 is located within close proximity to the light rail corridor and cannot be relocated.
 - A diagram illustrating these features which are currently located within Basement Level 2 is provided in Figure 12 below.
 - The FJMT approach lands the through-site link with views directly to the water, over Pirrama Park.

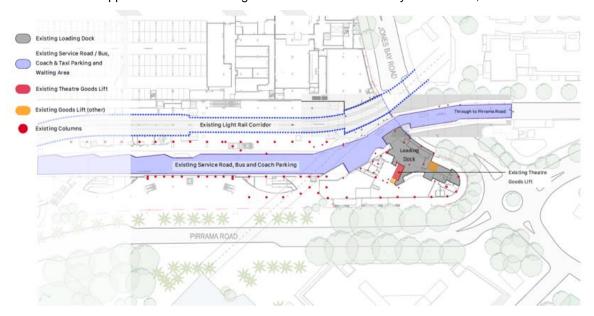


Figure 12 Basement services

Source: FJMT

- Providing an open to the air through-site link connecting Pirrama Road and Jones Bay Road is unable to be accommodated by the Star. It is essential that the future development on the site comprises an enclosed through-site link for the following reasons:
 - Staff access across the site from the main Star site to the future Hotel. This includes accessibility to back of house areas and the lift core;
 - Guest connectivity between the 6-star hotel and the wider Star offer, including top end food and beverage outlets, retail, theatres and other facilities. This is similar to the Darling Hotel which provides a seamless integration with the wider facility.
 - Loading and servicing: the existing MUEF is serviced from the docks north of the Light Rail line. It is the
 only possible location at the site without causing disruption to the existing road network and sensitive
 residential receptors nearby. This is discussed further in **Section 2.4** below.
 - Wind advice has been provided by WindTech which has investigated the wind impacts on an open to the air through-site link. The advice has found, exposing the through-site link to the sky would result in unacceptable wind impacts.
 - Existing facilities: there are a number of existing facilities and function spaces (as per **Figure 13**) that the proposed north tower podium will be required to connect to in order to achieve an integrated experience

from both a user experience aspect and serviceability aspect. It is a priority of The Star's to ensure guest connectivity is maintained to the Event Centre, Ballroom and Sports Bar. The back-of-house connections from the proposed hotel to the loading dock and existing good lift(s) servicing the MUEF are also vital to the serviceability of the hotel and maintaining the smooth operation of the existing complex as a whole. Whilst it is acknowledged that both the Pirrama Road and Jones Bay Road entry points of the through-site link present opportunities for articulation and double-height spaces, an open to the air through-site link is unachievable for these reasons.

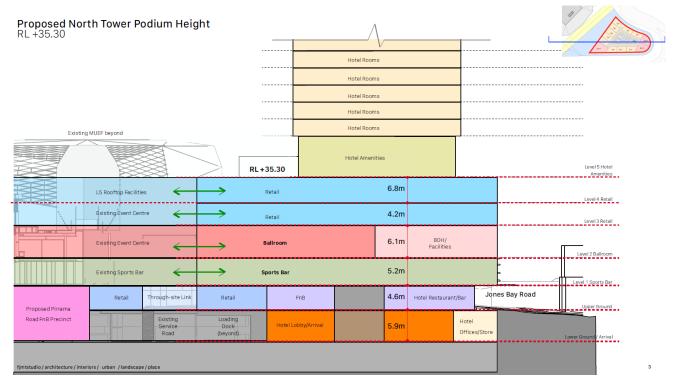


Figure 13 Northern Tower section

Source: FJMT

The Star therefore propose to retain the partially enclosed through-site link as originally presented to the DPE in the sub-precinct masterplan submission (shown in

Figure 14). It is requested that references to the 'open to the air' nature of the through-site link are removed from the design guidelines as requested in the sub-precinct master plan submission. The Star is able to commit to a Minimum 10.5m high through-site link from Pirrama Road and minimum 4.6m from Jones Bay Road. This has been tested and deemed acceptable from a wind point of view, as confirmed by WindTech.

The Star and its wind consultant, WindTech, are open to meeting with DPE's wind consultant to further discuss wind impacts. Notwithstanding this, detailed wind tunnelling testing will be undertaken at the detailed design stage.

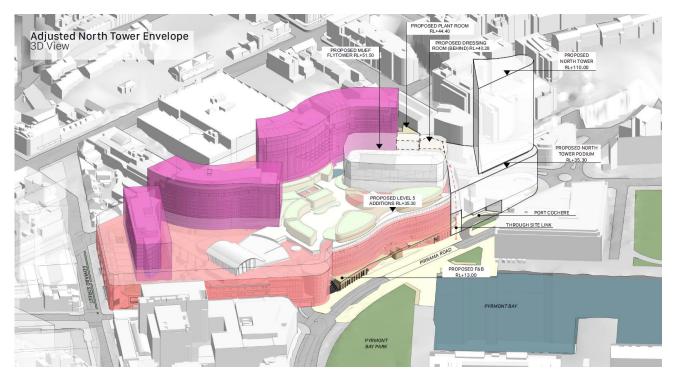


Figure 14 Proposed through-site link

Source: FJMT

2.4 Loading dock

The following loading docks currently service The Star site:

- The Star Loading Dock (Jones Bay Road);
- The Darling Loading Dock (Edward Street); and
- The Star Events Centre Loading Dock (Service Road accessed off Pirrama Road).

The Star Loading Dock (Jones Bay Road)

- The Star Loading Dock is the main loading dock for The Star site.
- It receives deliveries of fresh produce and non-perishables and beverages for outlets, general items such as stationary, mail, promotional items, computers, gaming equipment, as well as being the entry point for deliveries such as cards, maintenance supplies for in-house facilities and contractors, laundry, and housekeeping items (including uniforms) gas and cooking oils.
- Understandably, it is under a heavy load with vehicles queuing on Jones Bay Road, as indicated in the below images taken at the DPE site visit.





Figure 15 Jones Bay Road loading

- In addition, there is a second loading dock that is used for the secure and safe transfer of cash that must remain separate from all other operations. This is further west along Jones Bay Road.
- The above images also show the residential uses that existing on Jones Bay Road that result in tight operational times for these docks.
- As a result, there is no opportunity to add an additional loading dock to Jones Bay Road, from a spatial, traffic or noise perspective.

The Star Events Loading Dock (Service Road/access off Pirrama Road)

- The Star Events Centre loading dock is located within the northern part of the Light Rail / Bus servicing corridor and is accessible via a one-way service road from Pirrama Road.
- This loading dock is primarily used to unload and reload goods and production equipment used for stage plays, concerts, private functions and special events (e.g. Aria awards).
- This loading dock operates 24 hours per day during special events and is operational 365 days per year. The loading dock, being internal, can operate these hours without impact on the neighbouring residents.
- It has a freight elevator and raised loading dock platform that accommodates rear loading of a 19m semi-trailer. The raised dock platform can cater to loading or unloading two vehicles at a time, as two opposite bays. The freight elevator only provides access to The Star Events back-of-house zone.
- The loading dock layout that was proposed as part of Modification 13 and was considered appropriate is replicated at

• **Figure** 16.

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Figure 16 Modification 13 Loading Dock

Source: Modification 13 Report

Any final scheme needs to consider:

- Servicing vehicles and ability to manoeuvre safely, especially considering existing structure;
- · Operational noise on sensitive receptors;
- Potential co-location of MUEF loading with hotel loading including consideration of building efficiencies, servicing efficiencies, reduction of multiplicity of loading areas; and
- · Working with current structure and infrastructure.

3.0 Public benefits

In alignment with the PPPS, The Star is committed to providing the following public benefits as part of the future SSDA on the site:

- The Star will enhance and improve streetscape interfaces on all boundaries of the site as demonstrated in the Urban Design Report previously submitted to the DPE.
- The Star will enhance and improve public domain interfaces and site permeability, including wayfinding and potential 24-hour publicly accessible connections to maximise permeability at the ground plan.
- The Star will promote active transport (cycling and walking) along Pirrama Road between the entrance to The Star's car park and the roundabout on Jones Bay Road, and prioritise pedestrians and cyclists. The Public Domain Report that accompanied the Master Plan included a range of treatments to Pirrama Road including a shared area, which is to ensure the area is pedestrian and cyclist friendly.
- The Star is committed to improving the visibility of The Star light rail station and create an open promenade between the light rail and Pyrmont Bay Park.
- The Star is committed to improving the site's interaction with surrounding public spaces and will fund upgrades to public spaces once appropriate discussions with relevant stakeholders have been undertaken.
- The Star will assist community organisations in planning for the activation of surrounding public spaces for community events. As previously communicated, consideration of providing a community space is subject to the social infrastructure audit for the precinct.
- The Star is committed to providing landscaping works to the Level 5 rooftop on The Star site which has the potential to accommodate a rooftop garden and chef's nursery.
- As part of the detailed SSDA, The Star is committed to updating the Complete Streets Strategy which formed
 part of the Public Domain Report that accompanied the Master Plan to transition Pirrama Road into a shared
 zone.

The CoS have previously indicated that, as part of the Place Strategy process, they would prepare a contributions plan. The Star is committed to assisting with the funding of the above infrastructure however prior to entering into a public benefit offer would like to understand the final position of all contributions regimes.

4.0 Conclusion

I hope the above information addresses your correspondence issued on 25 February 2022, however if there are any outstanding matters you would like further clarification on, please contact me via the below.

Yours sincerely,

Tom Goode Director 0406 428 465

tgoode@ethosurban.com

Attachment A - Wind Advice prepared by WindTech



Doc Ref: WA531-24F01-rev1 PPPS Letter

Date: March 22, 2022

To: The Star Sydney

Address: 80 Pyrmont Street, Pyrmont NSW 2009

Attn: Mr Stephen Sablatnig

RE: RESPONSE TO PYRMONT PENINSULAR PLACE STRATEGY

- PLANNING CONTROLS FOR PEDESTRIAN WIND IMPACTS

1.1 Introduction

The draft Pyrmont Peninsula Place Strategy (PPPS) is currently in the process of community consultation. This letter is to comment specifically on the Department's request for an open to sky through-site link across the northern section of the site of The Star.

1.2 Expected wind conditions in the Northern Through-Site Link

A through-site link through the northern part of The Star site could either serve as a pedestrian thoroughfare or may involve stationary activities such as standing or window shopping.

A review of wind conditions at the northern end of the site measured in a study undertaken by Windtech Consultants in July 2009, (reference WA531-05F10(rev1)) shows that the local wind conditions at the proposed location of the through-site link are governed by the southerly and norther-easterly winds.

The results from the modelling indicated that without a through site link the wind conditions are currently equivalent to the criterion for standing. However, given the easterly orientation of this part Pirrama Road, the opening up of the northern end of the side to the westerly aspect via a through site link is expected to result in wind conditions within the through-site link that represent a significant increase over the existing wind speeds. This is due to the exposure of the western end to the high negative pressure and hence the tendency of the wind to accelerate through the link in response to the large pressure differential across the two ends of the through site link. This is likely to result in wind conditions in the through site link that may exceed the criterion for comfortable walking.

1.3 Effect of the proposed building massing

The prevalence of the north-easterly and southerly winds at the northern part of the developments means that the proposed massing with the alignment of the tower close to the northern edge of the open through site link will result in a significant downwash of the southerly winds into the through site link. These wind conditions are expected to be significantly worse than the expected wind conditions with the effect of the FJMT scheme

where a reverse podium is proposed to enable the tower to be positioned further to the north and covered through-site link.

1.4 Conclusions

The wind impact of the through-site link is dependent on the type of activity intended. The proposed massing of the tower at the northern end of The Star precinct in the draft PPPS is expected to result in strong wind conditions within the through-site link.

The proposal to impose a specific massing for the northern tower at The Star site would not bring about the desired outcome in terms of pedestrian amenity and a performance-based approach is recommended.

Sincerely,

Windtech Consultants

Tony Rofail MEng BEng FIEAust CPEng RPEQ NER IntPE(Aus) Director

Attachment B - Ritz Carlton Operational Requirements – 6 Star Hotel



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STR Chain Scale	Luxury (Classic)
Brand Description	The Ritz-Carlton sets the standard for rare and special luxury experiences worldwide, creating a stay that guests will remember forever.





Global	102 hotels (28,069 rooms)	44 hotels (8,174 rooms)
APAC	26 hotels (6,926 rooms)	24 hotels (5,284 rooms)
China	12 hotels (3,917 rooms)	13 hotels (3,197 rooms)

PROTOTYPE FACILITY PROGRAM SUMMARY

GFA per Key: 140 - 180 SM

ROOM	URBAN	RESORT
Room Sizes (net)	50 SM	50 SM
Room Height	Bedroom: 2.7 m cle Bathroom: 2.4 m cle	
Bathroom Requirements	5 fixtures	5 fixtures
Suite Sizes	2 - 6 bays	
Door System	Saflok RFID MT, Qua Quantum 3 RFID, or	
Executive Lounge	Yes	

LIFTS - See Design Guid	е	
Guestroom Lifts	1 lift per 80 keys (1,600 kg capacity)	
Guestroom Service Lifts	1 lift per 200 keys (2,000 kg capacity) plus one additional lift	
Podium Guest Lifts	Min. 2 lifts	
Podium Service Lifts	Min. 2 lifts	
FIRE LIFE SAFETY		
Comply with company standards		

	0171 per key. 140 - 100 0141
FOOD & BEVERAGE	
Three Meal Restaurant	Yes
Lobby Lounge / Bar	Yes
Specialty Bar	Yes
Specialty Restaurant	Yes
Chinese Restaurant	Market Driven
Deli / Pastry	Yes

FUNCTION ROOM

Spa

- Function room configuration depending on market needs
 Minimum ballroom height 5.5M for 500 SM ballroom
 Pre-function 40% of ballroom area

-	rre-tunction	40% OT	ballroom	area

Meeting Room	Market specific, meeting room and VIP room minimum 50 SM
Meeting Room Height	3.6 m clear
GYM, POOL, SPA	
Gym	Yes (Size: 190 SM min.)

Yes