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About Pyrmont Action Inc – Pyrmont Action was formed in 2003 following a community campaign to achieve the installation of up-to-date telecommunications infrastructure to serve the rapidly-growing residential and commercial redevelopment of the Peninsula. At that time, many of those who had moved to Pyrmont, only had access to a dial-up internet service. These early "settlers" recognized that some aspects of the development going on around them, could be improved with input from those moving from other parts of Sydney, NSW and even countries. We didn't know one another, came from different backgrounds and with different life experiences but have joined together to create a strong, active, diverse and caring community. Our objective is to work with the City of Sydney, the NSW Government and local residents and businesses to improve the physical and social amenity of our suburb.

Early successes, working with Council officers and with developers, Lend Lease, achieved a complete re-design of Waterfront Park, 1 Distillery Drive, and the establishment of urban bushland on the Western Escarpment. We were aided by the comprehensive approved Master Plans and building zonings and parameters contained in the Local Environment Plans which provided certainty and a baseline beyond which developers should not stray. We were not so lucky in achieving improvements in developments not subject to rules, eg Darling Harbour sites declared State Significant, despite "tick-a-box consultation".

We have been represented on a number of Community Reference/Liaison Groups, including the early version of the Bays Precinct CRG which reported in 2010 and its successor (now the Blackwattle Bay CRG), the Glebe Island/White Bay CLG, and now the PPPS Bounce Group and have built up a body of knowledge relating to planning in Pyrmont – its history, geography and people – upon which we draw to deliver our constructive analysis of this draft Strategy.

#### **PPPS - First Impressions**

The draft Strategy has been developed in response to the rushed 2019 GSC Review which recommended that it supported the delivery of the Government's vision consistent with the Greater Sydney Region Plan and Eastern City District Plan, by developing a Place Strategy, with a time frame and options for implementation. The ECDP (p6) vision is for the Peninsula to "become more innovative and globally competitive, carving out a greater portion of knowledge-intensive jobs from the Asia Pacific Region".



P11 of the draft PPPS states that it is led by the NSW Government's draft Economic Development Strategy. Even though the Phase 1 Engagement Report (June 2020) revealed that the PPPS Directions rated **most important** in submissions on the Directions document were Direction 5 A tapestry of greener public spaces and experiences (64%) and Direction 1 Development that complements or enhances the area (63%) only 40% of responders cited Direction 2 Jobs and industries of the future (40%) as "very important". Yet the draft PPPS places Direction 2 at the top of its Direction list (p27).

This Strategy is therefore structured primarily to deliver an economic outcome by encouraging "investment and innovation to boost jobs, creativity, tourism and night life" (p27), with little reference to the enhancement of the social fabric of the Peninsula. Housing should not "undermine the vision of the area as a jobs hub and economic driver of Sydney" (p36) so is a secondary consideration.

The Pyrmont Peninsula community has lived with development for many decades, mostly within known and accepted planning rules such as height, FSRs and building footprints. Even today, two new residential apartment buildings are nearing completion, together with the recent opening of a large new office building with the capacity to accommodate 2,000 workers. These developments "sit comfortably with terrace housing, smaller shops and heritage areas" (PPPS p28) and are accepted by the community. In contrast, the developments foreshadowed in the 4 Key sites – Blackwattle Bay, The Star, Harbourside and UTS Ultimo, will undoubtedly dominate and alienate existing developments on the Peninsula, setting planning precedents which could turn the Peninsula into an extension of the CBD – a planning outcome rejected by the 17 Community and Interest Groups as well as 5 Business & Land Owners in their feedback on the 10 Directions (Engagement Report p 25). The only group which identified "the evolving character of Pyrmont as an extension of the CBD" were the 8 respondents from the Peak Bodies and Industry Associations (Engagement Report, p27).

The Strategy does include some public benefits in its proposed Five Big Moves for Pyrmont (pp 38 – 43) and we ask that the affected local communities (Pyrmont, Ultimo, Glebe) be involved in the more detailed planning for their implementation.

The draft Economic Development Strategy which underpins the PPPS has been developed prior to and during the Covid-19 pandemic. Its recommendations are based on demand assumptions which may never be realized, given the huge economic and social impact of the virus. It is assumed that the commercial world will be back to normal some time during the 20-year period covered by the Strategy. Yet working from home may become the new norm. Google, a key employer based in Pyrmont, has announced that the company will allow employees to work remotely until July 2021, if not later, and there are indications that other businesses may do the same. Tech giants like Facebook and Twitter have set the trend allowing some employees to permanently work from home. For these companies the remote working model will have substantial benefits, but for landlords and small businesses that rely of office workers for their livelihood the trend could be detrimental. (Source: CNN)



Furthermore, it is assumed that the tourism and education markets will continue to grow, in particular the Chinese markets, yet they may be impacted in the longer term not just by the current bans on international travel, but by the cooling of international relationships not only between Australia and China, but influenced by Australia's strong ties with the US which is also experiencing strained relationships with China.

#### **The 10 Directions**

We will examine how well the directions have been realized in the draft PPPS and offer our proposals for projects which meet the objectives of the Strategy. Our submission on these Directions is Appendix A.

## Direction 1 – Development that complements or enhances the area.

It is difficult to reconcile the claim that as new development, revitalisation or expansion occur on key sites of Blackwattle Bay, The Star, Harbourside, and UTS Ultimo, the Peninsula's character and attributes will be preserved and enhanced by the intrusion of towers ranging from ~51 storeys (The Star and Harbourside), 45-storeys (Blackwattle Bay), and up to 70-storeys (UTS Ultimo) (PPPS p79). We envisage the Peninsula's built form as intermediate between the towers of the bleak CBD and the low-rise heritage character of Glebe, reflecting both the topography and the built form and scale of the many former wool stores and warehouses which enable sunlight to bathe our streets, our homes, and public spaces.

Darling Island Precinct - We reject the notion that a 51-storey tower built at the Southern end of The Star site will somehow "complement or enhance" historic Union Square just across the road from such a building, and a 16-storey tower on the northern end would similarly loom visually over the adjacent residential apartments, and heritage terraces in nearby Pyrmont Street, Jones Bay Road and Pyrmont Bay Park.

Blackwattle Bay Precinct - Similarly, we reject Infrastructure NSW's proposal to construct three 45-storey towers on the edge of Blackwattle Bay. They would be totally out of character with buildings in the vicinity including Harbour Mill, Wattle Crescent apartments, Bulwara Road apartments, and the Victorian terraces in Bulwara Road North. They would loom over Paradise Reserve and block sunlight in apartments. The visual impact from Glebe of such towers would be highly intrusive. (See Appendix B)

Tumbalong Park Precinct - We have opposed the proposed construction of a ~50 storey tower on the Harbourside site on the grounds of overshadowing, view loss, visual impact, the precedent it sets for similar developments in Pyrmont, and its lack of relationship to its immediate context in Pyrmont. The redevelopment of Darling Harbour has effectively turned its back on, and walled off Pyrmont from the harbour and the CBD and this additional large podium and tower would complete the wall. (A copy of our latest submission is Appendix C)

Ultimo Precinct - For UTS Ultimo the Strategy (p79) describes heights as being consistent with the City's Central Sydney Planning Strategy. The Sun Projection Controls Height Map



4\_23, p252 of the CSPS allows buildings up to 70 storeys (240m) high on this key site. A tower of this scale would overwhelm the UTS precinct, including the Goods Line and the few local parks in the area. However, we recognize that, sensitively designed, there is potential to create a vibrant hub at a scale that does not exceed existing height limits, in the heart of the Innovation Corridor. We oppose any redevelopment on the site of the historic Tram Sheds/Harwood Building, but support their repurposing for cultural and social purposes, similar to the re-use of the railway workshop buildings at Eveleigh and the ATP.

Wentworth Park Precinct - With regard to building heights in the Wentworth Park subprecinct, the only site available for redevelopment is the former City of Sydney depot at the corner of Fig and Wattle Sts. The CSPC has recently rejected a Concept DA for a mixed use development on this site, on the grounds of height excedence and other issues, a decision which is being appealed in the Land & Environment Court. As the developer has not yet settled the purchase of the site, it is possible it may come back on the market if its appeal is not upheld. We have long supported the use of this publicly owned site for a school and if this occurred, we would expect a development that did not exceed the height of the escarpment, thus sitting comfortably with terrace housing and nearby heritage repurposed former wool stores.

Recommendation 1 – Building heights in the 4 Key sites should be reduced to levels that complement existing building forms in Pyrmont and Ultimo.

### Direction 2 – Jobs and industries of the future

Whilst we support "investment and innovation to boost jobs, creativity, tourism and night life" (PPPS Direction 2), we believe this can be achieved without the need for towers in the Peninsula. Pyrmont is already home to tourist, entertainment, innovative technologies and service industries. Recently completed 21 Harris St, will accommodate 2,000 workers; 100 Harris Street has been re-purposed as a technology hub accommodating over 2,000 workers, and a DA for a new commercial building on the 88 Harris Street site next door, currently being assessed, will accommodate another 2,000 workers. Developers have never stopped evolving and re-purposing heritage buildings and constructing new ones in accordance with the height limits set in the LEP and Master Plans. At the other end of the Peninsula, the former TAB site has been redeveloped from a commercial to residential building. UTS has expanded considerably over the past 30 years, adding more jobs, particularly in the design and technology disciplines. The newly approved SFM will generate both jobs and visitors to the Peninsula.

However, small businesses, particularly in the retail and service sector have struggled, coping with CBD rentals and, a less-than-activated nightlife (with the exception of The Star and venues at Darling Harbour). What is required are more cultural venues and more activated retail street frontages. We value highly the presence of the Lyric Theatre in the Star complex and have long advocated for the inclusion of a cinema within new commercial developments, as well as venues to support community-based musical and theatrical performances. The City of Sydney has advocated for extended retail trading hours to 10pm and we have supported this proposal. One way to achieve night-time



activation is to locate venues, not on the fringes of the Peninsula, but in its heart, in Harris Street. Such amenities should be accessible and designed to keep workers in the larger businesses in Pyrmont after work, for a show or film, a meal, a drink, or to browse the retail offerings. Newtown is a good example of a high street which remains active after dark, yet retains its heritage, low-rise character.

Recommendation 2 – The push to boost jobs and economic growth should not dominate the development agenda and not be achieved at the expense of residential amenity.

#### Direction 3 – Centres for residents, workers and visitors

Direction 3 promotes "new lively and attractive centres for everyone to enjoy". We have long promoted activation at street level by inclusion of attractive shops, cafes and restaurants, with an emphasis on outdoor dining. But we've ended up with a plethora of large and small fitness centres, hairdressers, massage parlours and real estate agents.

Access, particularly in the evening, is a feature of any great Place. Workers who might remain on the Peninsula after work need to know they can get home by public transport. We are pleased that the Strategy has identified the construction of a Metro station in Pyrmont as an essential element in realizing this proposed new development phase. Entry to this station would need to be centrally located and we have identified a suitable site in the area bounded by Union St, Pyrmont Bridge Road and Edward Street the building on which is unoccupied. However, we also recommend delivery of increased capacity for the light rail service which, we are advised, is hampered currently by inadequate capacity in the power delivery system.

Recommendation 3 – We support a Metro station in Pyrmont.

Darling Island Precinct - We are not convinced that The Star needs to increase either its gambling or its hotel accommodation, given the huge expansion of both at Barangaroo, the recent construction of the Sofitel, and the current cloud hanging over the Chinese high-roller tourist market which is now subject to a government inquiry. In the last major redevelopment of The Star we sought activation of the street frontages of the Darling Hotel complex. Instead, they installed dark retail tunnels through the complex, with blank walls facing the streets.

Recommendation 4 – We reject the need for high rise hotel/residential development on the Star sites.

Tumbalong Park Precinct - Whilst we continue to deplore the height and bulk of the mixed use Harbourside development, if approved, it will accommodate new office and retail space, as well as new high-value residential space, noting that a new commercial building has been approved for Cockle Bay. But, similar to all new buildings at Darling Harbour, Harbourside turns its back on Pyrmont and Ultimo, and, we agree, there is a need to "create attractive, safe and easy-to-use streets behind the ICC" (p55) and this proposed new development.



Recommendation 5 – We support street activation behind the ICC and Harbourside developments.

Blackwattle Bay Precinct - The new Sydney Fish Markets will definitely attract additional local, interstate and international visitors (post Covid), will provide attractive retail and recreational space, especially for local residents and workers, and will be open in the evenings. Improved public transport access will be essential if the PPPS's objective of a reduction in private vehicle travel is to be achieved. We have long advocated for the reinstatement of a public bus route from Pyrmont to Ultimo via Harris St, to Broadway Shopping Centre, University of Sydney and RPAH via Parramatta Road, returning to Pyrmont via Pyrmont Bridge Road.

The PPPS (p66) suggests opportunities for the provision of "new social infrastructure (recreation, community, library, gallery or events)" in this sub-precinct. Whilst there is a shortfall of all these amenities, we propose that, rather than have widely distributed community facilities, they be centrally located as at present, in the Pyrmont Village Sub-precinct. We do, however, support provision of cultural facilities at Blackwattle Bay – a cinema, gallery, artists' studios and rehearsal space.

Recommendation 6 – Place planning should include a bus service to link the Peninsula with Broadway Shopping Centre, University of Sydney, RPAH and SFM.

Pyrmont Village Precinct - We have proposed, since 2006, the redevelopment of the Maybanke Centre site in Harris Street as the Maybanke Community Sports and Recreation Centre, thus freeing up much-needed space for community activities in the nearby Pyrmont Community Centre. Such a facility would enable the development of teams who could engage in competitive sports, and provide a space for active recreation for people who largely live in apartments. The site is owned by the City of Sydney, it comprises a small converted 2-storey toilet block, with a lower ¾-sized court and an upper ¾-sized court currently locked and unused. The City is unable to provide staff for this facility, and unable to redevelop the site to maximise its potential.

Recommendation 7 – NSW Government to fund construction of the Maybanke Community Sports and Recreation Centre on the City of Sydney's Maybanke site.

Ultimo Precinct - The best opportunity to provide new attractive centres in the Ultimo Sub-Precinct, is through the re-use of the Tram Sheds/Harwood Building next to the Powerhouse Museum, without compromising their heritage value. A revitalized Powerhouse will attract many more visitors who can also visit the Australian National Maritime Museum via an extended Goods Line. Any new tower on the UTS site should not overshadow this cultural heart of Ultimo in the Innovation Corridor. We note that there is an excellent library in Ultimo, and a library link at the Pyrmont Community Centre which also hosts the local book exchange.

Recommendation 8 – The Tram Sheds/Harwood Building should be retained and re-purposed to complement a revitalized Powerhouse Museum.



Wentworth Park Precinct - We support the return of the Greyhound Racing site for public use when the current lease expires. The only other vacant site in this sub-precinct is the former City of Sydney depot at the corner of Fig and Wattle Sts. Its future as a mixed development, including community sports facilities and a childcare centre, is currently the subject of a Land & Environment Court appeal.

Pirrama Precinct – We note the modest future growth goals listed – 190 more people and 350 more jobs – by 2021 (p70), with the focus on proposals that enhance public areas and active street frontages. The latter goal will be achieved when 21 Harris Street commercial building is fully leased. Currently, there are only 2 harbourside dining venues in this Sub-precinct – Zebra Lounge at 1 Harris St, and the kiosk in Pirrama Park. A restaurant next to the Zebra Lounge, has been empty for some years. We strongly support any proposals that create opportunities for more such venues to take advantage of the proposed continuous foreshore walk.

Recommendation 9 – The Plan should encourage provision of more foreshore dining venues on the Peninsula.

## Direction 4 – A Unified Planning Framework

We would welcome a much clearer planning framework, not just for the Pyrmont Peninsula, but for the State as a whole. At the moment, planning rules governing height, zoning, FSRs etc. can be discarded by the Government declaring a site of State Significance. All certainty on which investment decisions have been made, is thereby cancelled. The recent Darling Harbour redevelopment demonstrates how farcical community consultation can be with virtually all requests for changes/improvements to benefit the community met with the developer stating that such a measure "was not in our design brief" (developed in secret by Infrastructure NSW).

Another factor which results in confusion is the plethora of Government departments and quangos which have a finger in the planning pie. Instead of having the Department of Planning (reporting to the Minister for Planning) and the City of Sydney (directly elected), determining both the planning framework and assessment outcomes, we are faced with visions prepared by the Greater Sydney Commission and Infrastructure NSW, both reporting to the Premier, and both appearing to have primacy in dictating the Terms of Reference and objectives of this PPPS. There are also strong lobby groups such as the Committee for Sydney and the Western Harbour Alliance which appear to have direct lines to those calling the shots. Yet those who care deeply about our Place struggle to be heard.

And the picture is further complicated by the different entities owning or controlling public land in the Peninsula – Transdev, RMS, Ports Authority NSW, City of Sydney, Office of Strategic Land (Dept of Planning), Property NSW, Department of Transport, Westconnex, Sydney Metro, Department of Arts and Culture, Department of Housing, Commonwealth Government (ANMM).



We strongly recommend that responsibility for Planning in NSW be returned to the Minister for Planning, with the Department of Planning and the City of Sydney working in partnership with communities to implement clear and unambigious rules which have no exceptions eg declarations of sites as State Significant. When changes to planning frameworks are required, community representatives should have membership on any Steering Committee of representatives of government agencies established to oversee such projects.

"Easy to use and easy to administer" should not be shorthand for "cutting red tape" or speeding up the process, which inevitably lead to inferior outcomes, eg allowing private certification of buildings resulting in devastating construction outcomes.

Recommendation 10 – Responsibility for planning should be returned to the Minister for Planning and the City of Sydney with no departures from approved Master Plans, LEPs, and DCPs.

#### Direction 5 – A tapestry of greener public spaces and experiences

Darling Island Precinct – We support most measures to upgrade open spaces outlined on p51 but question the efficacy of provision of power outlets on seating in Metcalfe Park. We also point out that a new suite of fitness equipment is soon to be installed in Pirrama Park nearby. We propose that ownership of the public parks in this precinct be transferred to the City of Sydney to ensure that they are properly maintained and their usage managed appropriately. This would also reduce the public confusion regarding which body to contact in the event of damage or inappropriate usage of such public parkland.

We also support the extension of the foreshore walkway, ensuring that it in no way damages or encroaches on the heritage buildings in its vicinity.

Use of any outdoor sports and recreation facilities provided on rooftops must be restricted to hours that ensure that nearby residents are not disturbed by noise. It is unclear from the PPPS (p51) whether it is proposed that such facilities be privately or publicly accessed. It should be noted that the court on top of the Ultimo Community Centre is not full-sized. We have strongly recommended (see p6 of this submission) provision of a centrally-located community Sports and Recreation Centre in the Pyrmont Village Sub-Precinct.

Recommendation 11 – Ownership of parks should be transferred to the City of Sydney.

Tumbalong Park Precinct – The draft Strategy (p55) proposes "publicly accessible, privately-owned space on rooftops or in podiums or viewing platforms". Again, given the proximity of the proposed Harbourside redevelopment, and likely redevelopment of the lbis and Novotel Hotel sites, together with their close proximity to apartment buildings, it will be necessary to apply conditions to ensure that the use of this space does not negatively impact on residential amenity.



Recommendation 12 - use of open space on rooftops should not be permitted to disturb nearby residents.

The Darling Harbour precinct, developed originally as a Place for the people of Sydney to recreate, is now largely privatized, and much of the original green space has been built over or turned into concrete paths. Visual access to the harbour from the south has been blocked by the Ribbon development, and construction of the Cockle Bay and Harbourside towers will complete the walling in of the water from the Eastern and Western sides. We have been endeavouring to achieve the re-installation of a much-loved sculpture *Curtain Call*, which provides a reminder of the important role of Darling Harbour in the shipment of wool to all parts of the World. It remains in storage and we strongly recommend its re-installation in a prominent area to delight visitors to this precinct.

Recommendation 13 – Property NSW should re-install the Curtain Call sculpture in Darling Harbour.

Ultimo Precinct – We support the recommendation (No 15, p59), although it is difficult to identify where additional parks can be accommodated. We particularly encourage the planting of local native street trees. There should be no overshadowing of the few parks that are located in this precinct and, possibly, the installation of pedestrian islands with trees in suitable local streets.

Recommendation 14 – We support provision of more green space and trees in Ultimo.

Wentworth Park Precinct – We support the proposal to return the greyhound racing facility when its lease expires and urge the retention of the oval and heritage buildings on the site. The oval should be maintained as a local community sporting and athletics facility and made available to local schools (Ultimo PS, Glebe PS and International Grammar School) which have scarce, or no open space available for students to exercise. We would not support a further extension of the lease on the site of the popup primary school at Wentworth Park.

Recommendation 15 – Retain the oval on the greyhound racing site for community sports.

We note priority 11 (p63) identifies a site "close to the light rail stop" for a multi-utility hub, without specifying where it might be located. The large site bounded by Fig and Wattle Street and the light rail corridor is currently subject to an appeal by a developer against CSPC rejection of its Concept DA. If upheld there will be a mixed use development on the site. If refused there may be an opportunity for a parking station to be situated beneath a school, or other appropriate development which may add to the green open space in the sub-precinct. We also draw attention to the rail corridor area which is currently maintained as urban bushland by volunteers from Pyrmont Ultimo Landcare Inc. We would oppose any proposal to locate a multi-utility hub on that area. This project is



supported by the City of Sydney in its Urban Ecology Strategic Action Plan. RMS occupies a temporary building on part of a corridor reserved for a future Anzac Bridge on-ramp. This site is poorly maintained and could be converted to green space, if vacated by RMS. Similarly, the City of Sydney owns a small site, currently a storage depot which, if vacated, could be converted to a pocket park or an extension to the urban bushland project.

Recommendation 16 – Any plans for a multi-utility hub should not be on sites maintained by volunteers as urban bushland.

Blackwattle Bay Precinct – Whilst we strongly oppose the 45-storey towers proposed in INSW's 3 scenarios for the redevelopment on the current SFM site, we would welcome the opportunity to work with planners to develop a Place Plan that achieves the objectives of Direction 1, including provision of green space along the proposed foreshore promenade.

In particular, we recommend that the Master Plan for this sub-precinct incorporate a foreshore park on the sites currently zoned Public Recreation at the northern end of Bank Street. In 2004, the then Government announced that this area would be a place for parkland and non-motorised boating facility. This was confirmed in the approved 2006 Master Plan for Bank Street (unfortunately cancelled by the incoming Coalition Government). Members of the Pyrmont community and dragon boating clubs submitted a Great Idea (June 2015) to Urban Growth (now incorporated into INSW) promoting the use of these sites for a park for both passive and active recreation, and as a home for the many dragon boat clubs based on the site under the Anzac Bridge. Part of the site is occupied currently by the Blackwattle Bay Marina, leased to All Occasion Cruises party boat hire company. This temporary development was approved, against strong community opposition, by the IPCN for a period of 5-years. We strongly oppose any moves to "formalize the public motorized boating facilities" (p67) or extend this lease which compromises the site as a public park and dragon boat facility to serve this densely populated area of Pyrmont, as well as visitors and users of the proposed foreshore promenade. A copy of the Great Idea is attached as Appendix D.

Recommendation 17 – The Bank Street Foreshore Park should be developed for public recreation and passive boating.

Pirrama Precinct – This sub-precinct is home to many of the popular parks on the Peninsula, all of which are well used. However, maintenance of these parks is substandard, with trees and shrubs dying and not replaced, the stormwater storage and delivery system not topped up, with hoses not maintained. Whilst Pirrama Park is owned and managed by the City of Sydney, the other foreshore parks are owned by Property NSW and maintained (or not) by private contractors. The parks on the higher areas are owned by the Office of Strategic Lands, again poorly maintained by private contractors. The area of urban bushland zoned Public Recreation on the Western Escarpment (at the end of Distillery Drive) suffers from weed infestation which, on the rare occasions they attend the site, contractors spray with poison, thus killing surrounding native plants. There



are now large bare patches of dirt which is eroding in heavy rainfall and there has been no attempt to rehabilitate the site.

The original Master Plan for major developments in the Pirrama sub-precinct intended for the Public Recreation areas to be transferred from Government ownership to the City of Sydney. It is now around 15 years since the completion of these developments but the transfers have not occurred. It is our view that to achieve recommendation 3 (p71) "enhance public areas" the Government should effect the early transfer of ownership of all parks in the Pirrama sub-precinct to the City of Sydney.

Recommendation 18 – Ownership of all public parks in the Peninsula should be transferred to the City of Sydney.

The Pyrmont-Ultimo Chamber of Commerce holds its annual Food and Wine Festival in Pirrama Park and has been endeavouring to resurrect the popular monthly Growers Markets, but has yet to overcome bureaucratic hurdles imposed by the park's owner.

Pyrmont Village Precinct – This precinct contains two village hearts – Union Square in Pyrmont and Quarry Green in Ultimo. Both sites host important community events. Union Square hosts the annual Anzac Day Ceremony, and Carols in the Square; Quarry Green hosts Second Hand Saturday and the Christmas Nativity. These events are very well attended and provide opportunities for the local choir, Pyrmont Sings!, the Men's Shed Band, as well as local children to perform. Pyrmont community volunteers also organize the annual Christmas in Pyrmont Festival, held in John Street Square and John Street, which raises in the order of \$100,000 for local charities and the Ultimo PS.

We strongly support priority 4 (p75) which seeks "protection of Union Square as an important public space, including solar access and the sense of openness from views to the sky" and priority 2 which promotes "safe and accessible spaces for community to gather". We have been seeking its re-design to (a) improve safety; and (b) make it more appropriate for outdoor events. Its current configuration has many disparate sets of single or multiple steps which has resulted in many falls and injuries, especially when the Square is crowded with visitors, as the different levels are hard to see. We also envisage an amphitheatre arrangement of stepped seating descending from Harris Street footpath into a larger level area where events can be staged.

Recommendation 19 – Redesign Union Square to improve safety and suitability for outdoor events.

#### Direction 6 - Creativity, Culture and Heritage

Darling Island Precinct – Before being sold and re-purposed as Commercial space, Jones Bay Wharf was home to artists, sculptors and artisans, as space was affordable and it was a wonderful place in which to be creative. Most of the current owners operate low impact office premises, but those closest to Pirrama Road have now been converted to event venues generating negative impacts on residents living directly across the road. These activities have now been approved by DPIE for self-management of their



conditions of operation. Whilst these activities may have "brought the area to life" (p33) it has been at the cost of residential amenity. In any new planning regime, zoning must ensure that the "needs of local residents" (p50) are not compromised in a push to generate more jobs via high impact tourist development.

Recommendation 20 – Ensure any new entertainment/event venues do not reduce residential amenity and are located away from residential areas.

We support Place Priority 1's plan for new jobs in culture, creativity and innovation (p51) and Place Priority 2 which promotes adaptation of space in older building for new workplaces. In particular, when implementing these priorities, the planners zone Places for **affordable** cultural activities, such as artists' studios and music rehearsal space, most likely in older heritage buildings which can't be demolished for expensive redevelopments.

Any new tourist and/or entertainment development in this precinct should be required to incorporate venues **affordable** and appropriately designed for community events. The Star's rejected Ritz-Carlton hotel/residential development included a Neighbourhood Centre which, unfortunately, was poorly designed for such purposes, with 5 huge columns scattered around the 300 sqm floor space which was also interrupted by a large stairwell.

Recommendation 21 – Ensure provision of affordable new work places and appropriate space for community events.

Tumbalong Park Precinct – Further development opportunities have been identified on the Harbourside site, and we are aware of negotiations for the purchase of the Novotel and Ibis hotel sites on the Eastern edge of Pyrmont with a view to redevelopment. Whilst we support the idea of such new spaces attracting tourism and cultural and creative businesses that "integrate with the character of residential areas and needs of local residents" (p54), this would require the developer to work with members of the local community, the Department of Planning and the City of Sydney, to ensure that such features are included in the developer's architectural design brief.

Recommendation 22 – New spaces should integrate with the character of residential areas and meet the needs of local community.

Ultimo Sub-Precinct – The key to "celebrating Pyrmont Peninsula's culture, heritage and connections to Country" (p33) in this sub-precinct is the resurrection of the Powerhouse Museum to its former status as a world-class museum and showcase for Australian and international innovation. It sits in the heart of the Innovation Corridor and, after years of neglect requires an immediate injection of funds and highly qualified curatorial staff. Its future must be as a museum – not a tarted up events venue (as envisaged for the proposed Parramatta Powerhouse). Evidence at the current Legislative Council Inquiry into its future, indicated that such a revival would cost in the order of \$150M.



We support the celebration of Ultimo's heritage, in particular the re-use of the Tram Sheds/Harwood Building for cultural purposes. These facilities could be connected by a tunnel between the lower ground storage area in the Powerhouse building and the Tram Sheds enabling ease of transport of sometimes fragile materials between the two heritage areas.

Recommendation 23 – The Powerhouse Museum should be restored as a world-class museum with improved connection with the Tram Sheds/Harwood Building.

Wentworth Park Precinct – Priority 4 (p63) refers to "cultural production and rehearsal space as key sites are developed". Apart from the Fig/Wattle St depot site, we are unaware of other sites that could be developed, or re-developed without compromising the heritage values of these former wool stores and warehouses. The future of the depot site is up in the air, but if it again becomes available for sale, our strong preference is its use for a Junior Secondary School. Of course, we would support re-purposing existing buildings for cultural purposes, if they become available.

Recommendation 24 – If the former City of Sydney depot site (Fig/Wattle Sts) becomes available it should be purchased by the Dept of Education for a Junior Secondary School campus.

Blackwattle Bay Precinct - We note the design elements which purport to celebrate First Nations people's relationship to the land and harbour proposed by INSW in the redevelopment of this sub-precinct. Whilst any final design must be subject to genuine input and approval of those who identify as custodians of this bay and its immediate precinct, we have long hoped for some tangible recognition of First Nations people's use of what the Invaders named Tinker's Well (but surely there must be a more appropriate First Nations appellation). The Well has been built over twice, but there are still active springs in the escarpment on the E side of Bank Street and provision of a physical connection between the escarpment the Bank Street Public Recreation Area should be considered – in consultation with custodians of these sites.

Recommendation 25 – Appropriately recognize First Nations' connection with the freshwater springs on the Western Escarpment in the design of the Bank Street Public Recreation Area.

Pirrama Precinct - It has been disappointing that Property NSW has seen fit to sell the heritage-listed Scott Street Terraces which house the popular Culture at Work non-profit Studio/Gallery venue and not only provides exhibition space, but supports an Artist in Residence Program and offers free painting lessons for young local children. The new owner of the property has given notice that this facility must close at the end of 2020 and no new affordable premises have been found. We strongly recommend that new or repurposed building developments proposed for the Wentworth Park and/or Blackwattle Bay sub-precinct, include affordable creative space for artists, designers and musicians and as an attraction for locals and visitors alike.



Pyrmont Village Precinct – Most of the Place Priorities outlined on p75 have already been realized in the earlier planned re-development of former industrial sites at the northern end of the Peninsula. Heritage structures have been retained and re-imagined as homes, offices and shops. However, there has been little or no effort to "include Aboriginal cultural heritage interpretation in the sub-precinct. Consultation with First Nations custodians should occur to identify ways in which their culture can be celebrated in this sub-precinct.

## Direction 7 – Making it Easier to Move Around

Access to and within the Pyrmont Peninsula is critical and we strongly support a Metro station in Pyrmont. We have also recommended a reinstatement of the 449 bus route to Broadway Shopping Centre, University of Sydney, RPAH and the SFM (see p6 of this submission). The Strategy's focus appears to be on inhibiting vehicular traffic in and through the Peninsula, by narrowing busy roads, eg by widening footpaths (p63), and reducing parking spaces both within new developments and on the streets. It is essential that such a Strategy be accompanied by greatly enhanced public transport which, in turn enables the introduction of Congestion Charging. We agree that pedestrian and cyclist movement in and through Pyrmont Peninsula is challenging. We make the following recommendations to improve movement ground the Peninsula:

- When a bus lane was added to the Western Distributor exit to the CBD, the direct pedestrian link between Harris Street (at Fig Street) to the CBD was truncated. We sought its full reinstatement as part of the Darling Harbour redevelopment but it was only extended ~20 metres, with a new lift and stairs installed down into the poorly signposted public domain, leaving people to seek a way out of DH in order to reach their final CBD destination. When the lift is out of order, pedestrians, including those with disabilities or wheeling prams, and cyclists either having to negotiate the steep stairs, or retrace their steps to Harris Street and find another way to access their destination. This direct access is vital for residents and workers from Ultimo and Pyrmont.
- We support the proposed new road through the Blackwattle Bay redevelopment site, running from the Wattle St lights to the lights at the Fish Markets LR station. This will remove 2 sets of lights currently impeding local access to the Northern Peninsula precincts and relieve some of the current congestion in the Anzac Bridge approaches.
- One major impediment to people's ability to walk or cycle around is the phasing
  of traffic lights to favour vehicular movement at the expense of pedestrians. We
  have proposed construction of a pedestrian tunnel to and from Wattle Street,
  under Pyrmont Bridge Road, to the new SFM, providing easy access from the
  Wentworth Park LR station. A similar tunnel could be built under Bank Street for
  ease of access to the Fish Markets LR station and the Pyrmont Village precinct.
- We strongly oppose the installation of "commuter" cycleways on either side of Pyrmont Bridge Road between Wattle Street and the Pyrmont Bridge. The City of Sydney is currently installing a multi-million dollar separated cycleway in Miller and Saunders Sts, with a designated link between Pyrmont Bridge Road and Miller



Street via Bulwara Road (which is a vehicle dead-end with low traffic movements). The narrowing of Pyrmont Bridge Road is totally unnecessary, and would severely impact on the already constrained flow of through traffic, also affecting Harris Street and Wattle Street.

- We support the blocking of vehicular access to the Western Distributor from Pyrmont Street ensuring that the pedestrian linkage is retained.
- We are ambivalent about the proposal to make Harris Street two-way to Regent Street, and Wattle Street two-way along its length and recommend provision of a more detailed analysis of the impacts of such a move.
- We support the provision of 2 ferry stops as outlined in INSW's Blackwattle Bay scenarios, but recommend the relocation of the stop depicted at the end of Miller Street, to a site at the end of Quarry Master Drive, moving the proposed marina at that site further south to the end of Miller Street. This would maximise land available for public recreation, remove a disruptive commercial activity from the dense residential precinct to the North of Quarry Master Drive and give priority to the safe passage of the dragon boats. Consideration should be given to a ferry service linking Blackwattle Bay, Pirrama Park, Barangaroo and Circular Quay.
- Directional signage is poor to non-existent throughout the Peninsula. It is particularly poor in Darling Harbour where destinations within the precinct are reasonably clear, but signage directing pedestrians to destinations beyond it are virtually non-existent.

Recommendation 26 – Extend Fig Street walkway directly to the CBD; we support a new road running from lights at Wattle Street to the Fish Markets lights; ensure traffic lights prioritise pedestrian movement; we oppose a pop-up cycleway in Pyrmont Bridge Rd from Wattle Street to the Pyrmont Bridge; we support the closure of Pyrmont St vehicular on-ramp to the W. Distributor; we support a ferry stop in Blackwattle Bay situated at the bottom of Quarry Master Drive; we support improved way-finding signage through the Peninsula.

# Direction 8 – Building now for a sustainable future

All new developments should incorporate environmental sustainability measures such as renewable energy generation and storage technologies; water capture and recycling; orientations for buildings should maximise winter sunlight and air movement within thus reducing the need for air-conditioning; and light sensors which detect movement within office buildings to reduce illumination when rooms are empty. Measures should also be developed to make it easy for existing buildings to be retro-fitted with EV charging and renewable energy capabilities. Consideration should also be given to the use of sustainable construction materials in new buildings.

We support the concept of multi-utility hubs on larger sites (p35) in which measures such as EV charging points and renewable energy and water re-cycling measures can be centralized.



Recommendation 27 – We support installation of sustainability measures and water re-cycling in all new or re-purposed developments.

# Direction 9 – Great homes that can suit the needs of more people

Direction 9 (p36) makes strong statements in support of "diversity of housing types, tenure and price points" including social and affordable housing but then states that residential development should "not undermine the vision of the area as a jobs hub and economic driver of Sydney". Even more alarming is the identification, under the heading of Opportunities, of "redevelopment of small lots and older buildings, **including existing social housing sites**, to increase affordable housing" (p70). The Pyrmont Peninsula is home to Social and Affordable Housing because the planners of the earlier redevelopment of the Peninsula ensured that they were constructed early in the implementation phase, and that they were dispersed among the existing terrace housing, and the new apartment buildings which progressively brought new residents to the area.

We strongly reject any suggestion that the "affordable housing scheme in place on the Peninsula" (p36) should not be retained. The fate of the Millers Point residents, and the uncertain future of social and affordable housing tenants in Waterloo should not be repeated in Pyrmont and Ultimo. It is the responsibility of the planners implementing this Strategy to zone existing public housing developments in such a way that the sites **can not** be redeveloped, and ensure that additional sites on which such housing can be provided are similarly identified and protected from commercial housing development. The Department of Housing's role is to deliver and protect public housing.

With the inclusion of student housing in the Government's definition of affordable housing, we have seen an explosion of such in the vicinity of UTS and the University of Sydney, with a steady increase in the number of homeless people on our streets and in tents in parks eg Belmore Park. The provision of student accommodation should not replace provision of substantially more Social and Affordable Housing or even more boarding house accommodation.

Recommendation 28 – All existing Social and Affordable Housing in the Peninsula must be retained and additional such housing incorporated in appropriate new developments.

#### Direction 10 - A Collaborative Voice

This direction aspires to "a cohesive, agreed approach to bring the best outcomes for the Pyrmont Peninsula" (p37). Yet the Strategy is favouring an Industry-led Business Improvement District model put forward by Western Harbour Alliance (WHA) and the Committee for Sydney (CfS) whose membership is largely from the corporate sector, ignoring the views of the 17 Community & Interest groups "which articulated a deep need for community consultation at all stages of the Place Strategy process" who responded to the exhibition of the draft 10 Directions document (Phase 1, Engagement Report, p 26)



Options for Future Governance of the implementation of the Strategy are explored on p85 of the draft PPPS. With the lack of community representation on the WHA and CfS, as well as the PPPS Steering Committee overseeing the development of the Strategy, the rushed timetable set by the Premier's Greater Sydney Commission, and the restrictions placed on face-to-face collaboration by the Covid-19 pandemic, community engagement has been challenging for both the PPPS team and the members of the Bounce Group. Whilst Pyrmont Action has provided constructive feedback at every opportunity, it has been difficult to identify how any of our recommendations, or those of our Ultimo colleagues, have been incorporated in the draft PPPS. Similar comments can be made about the community consultation on the Blackwattle Bay scenarios despite attendance at many meetings of the various manifestations of the CRG held with those charged with their development over the past 5 years.

The most effective model for enduring and effective collaboration in the implementation of the Strategy will involve the establishment of a Steering Group with representation from: relevant government instrumentalities eg Departments of Transport, Housing, Planning, Education, INSW; City of Sydney; Pyrmont-Ultimo Chamber of Commerce; local community groups, Pyrmont Action Inc, the Glebe Society and Ultimo Village Voice; and either the Committee for Sydney OR the Western Harbour Alliance which represent the corporate sector.

Recommendation 29 – Establish a Steering Group with representatives from relevant government agencies, City of Sydney, Pyrmont-Ultimo Chamber of Commerce, local community groups and from a peak body or industry association to oversee PPS implementation.

We now provide comments on the Five Big Moves

#### A World-class harbour foreshore walk

We support this recommendation and refer to our previous comments on p10 of this submission, and the attached Great Idea for Park to Point: Bank Street Waterfront District. It should be noted that this proposal was developed on the assumption that the Sydney Heritage Fleet Museum would occupy part of the site. Since then a Modification submitted by RMS has been approved for a temporary (5-year) marina facility in the place of the cultural Museum. When the 5-year term expires we would expect the building recently erected on the Museum site to either be removed, or transferred for the use of dragon boat clubs which have been without even basic facilities for many, many years. The northern marina proposed by INSW could be located adjacent 1 Bank Street, where the current buildings could be updated and renovated to house the marina's office and amenities.

The Great Idea proposes an extension to the foreshore walkway around and through the Glebe Island Bridge abutment.



We recommend an additional Action for this Big Move to incorporate the park and walkway extension, all to involve extensive consultation with the community and members of the dragon boat clubs.

Recommendation 30 – Incorporate ideas from the Park to Point Great Idea in the design of the Bank Street Foreshore Park.

#### A vibrant 24-hour cultural and entertainment destination

Whilst we accept the 24-hour operation of The Star, the Pyrmont Bridge Hotel precinct and Darling Harbour, and approve the extension of retail shopping hours to 10pm, we would oppose expansion of 24-hour operation across the whole Peninsula. The Ultimo sub-precinct may also lend itself to longer operating hours, but, given the proximity of the area West of Murray Street, Blackwattle Bay, Wentworth Park, Pirrama and Pyrmont Village sub-precincts and the Jones Bay Wharf area to densely populated residential areas, we strongly oppose the imposition of 24-hour operation in these precincts.

We support investigation of opportunities for new entertainment, events and cultural space in the Peninsula (Action 3 p40), in particular the re-introduction of the monthly Growers' Market, and investigation of ways in which John Street Square and Quarry Green might be further activated without compromising the amenity of nearby residents.

Action 4 recommends enabling a diversity of night-time experiences and these are supported provided they do not adversely impact the residential amenity of those living nearby.

Recommendation 31 – We oppose expansion of 24-hour venue operation across the Peninsula but support new cultural and entertainment venues if residential amenity is assured.

## **Connect to Metro**

We strongly support the delivery of a Pyrmont Metro Station to serve residents, workers, visitors and tourists. None of the Plan's proposed strategies can be implement without it. We recommend that the station be located underground with entry/exits being modest and low impact, comprising a lift and escalator to street level. The station entry should be centrally located in the Pyrmont Village sub-precinct to enable access to all major tourist destinations, excluding any heritage site, such as Union Square, from consideration and any development built in association with the station should be modest in height to "sit comfortably with terrace housing, smaller shops and heritage areas" (p28)

Recommendation 32 – The Metro station entry must have minimal impact at street level and not located in Union Square.



#### Low-carbon, high-performance precinct

We support the investigation of the delivery of multi-utility hubs and integrated models of car parking, ensuring genuine collaboration with members of the local community, and the Pyrmont-Ultimo Chamber of Commerce.

Recommendation 33 – We support in principle multi-utility hubs in appropriate locations.

# More, better and activated public space

The proposed investigation into the return of Wentworth Park to the community as public open space is supported and its future use should be determined in collaboration with members of the Blackwattle Cove Coalition which comprises representatives from the Glebe, Ultimo and Pyrmont communities.

Provided that this Action 8 does not refer to our proposed Bank Street Park, but to the dark areas currently used for parking for the current SFM, we support its temporary or pop-up use for tour bus parking and other creative and/or recreational uses such as skate boarding. These areas are required to be kept clear of permanent structures to enable access to the underside of the Western Distributor.

We agree that access between Darling Harbour and the Pyrmont Peninsula is difficult. Pedestrians have to be redirected from Darling Drive to the harbour promenade and around Harbourside, then take an escalator from inside the building in order to reach the lights at the end of Pyrmont Bridge. Re-designing that interface should be conducted in partnership with the people who live and work in the area.

We strongly oppose a temporary, pop-up or permanent cycleway along Pyrmont Bridge Road but would engage in collaboration on this use of other streets in Pyrmont where such use would not exacerbate existing traffic congestion.

Recommendation 34 – We support provision of more and better access to public open space.

### Big Move 6 – Accessible Services for the Growing Population

The planned increases in both residential and working populations to a total of 28,500 residents and 60,000 – 63,000 workers by 2041 (p5, Peninsula Economic Development Strategy) for the Peninsula must be accompanied by accessible social services that provide for the needs of the existing population whilst attracting and retaining the new. As the Strategy does not address those needs, we propose a **Big Move 6**. This Move will provide services in Health, Education, Security and Aged Care that are accessible by all.

While major hospitals (RPAH, Sydney Hospital and the Eye Hospital) are within reach of the population, physical access for emergency response to domestic and work-related accidents that abound in a population of this size and broad demographic is limited.



Clinics to provide for emergencies, for general health and for an ageing population are needed to fill the gap between the few local medical practitioners and full hospital services. An ambulance station would also provide for local needs and for quick access to the CBD, in parallel with the fire services from the Pyrmont Fire Station.

Recommendation 35 – Expansion of residential and worker populations require provision of clinics and an ambulance station to provide for medical emergencies.

The Strategy states that students from Pyrmont and Ultimo lived within 800m from Blackwattle Bay Secondary College so could easily access it by walking or cycling. However, it fails to recognize that this is only a Years 11-12 campus of Sydney Secondary College and that P/U students have a complex journey by different modes of transport, plus walking to reach the Leichhardt and Balmain Years 7 – 10 campuses of SSC. Both these campuses are already at capacity. It should also be noted that students from P/U have been excluded from the boundaries of the catchment for the new Inner City High School, even though it is easily accessed from the Peninsula.

We are advised that the PPPS team is now discussing this issue with the Department of Education. In the event that the catchment boundaries cannot be changed or the P/U students accommodated at the new school, we propose investigation of an appropriate site for a new junior campus of Sydney Secondary College, noting that the Fig/Wattle St depot site may become available if the sale by the City of Sydney to developer, Landream Pyrmont Pty Ltd, falls through. This 1.3ha site is publicly owned, close to the light rail and in an ideal location opposite Wentworth Park. Place planning implies that physical and social infrastructure is delivered along with expansion through redevelopment. We expect that the educational needs of Peninsula students will be met and that they will be accessible.

Recommendation 36 – We support provision of a new Junior Secondary College campus accessible to Pyrmont/Ultimo students.

With the proposals to greatly increase 24-hour activity on the Peninsula, and the prospective growth in population to around 30,000 residents, and even greater numbers of workers, it is imperative that the Government provide the Peninsula community with a police station such as those located at the popular tourist and visitor precincts in The Rocks and King's Cross. A station was located at the corner of Scott and Harris Sts but was closed around 15 years ago. The 24-hour Water Police facility also was moved to Balmain, leaving Pyrmont and Ultimo without an easily accessible police station. Just in the last month there has been a serious assault and 1 murder in Pyrmont and there is a history of anti-social behaviour associated with the streets and parks around The Star Casino complex and the Pyrmont Bridge, as well as regular thefts, eg in Upper Mount Street. Patrols are few and far between, and the Western Distributor and Darling Harbour create barriers to vehicular quick responses. We have supported a Pyrmont Metro Station in Recommendation 3 and propose the inclusion of a street level 24-hour police station, as part of Central Sydney LAC, within any development built in association with the Metro station.



Recommendation 37 – Provide a street level 24-hour police station within development associated with the proposed Pyrmont Metro station.

We appreciate the opportunity to provide feedback on the draft Pyrmont Peninsula Place Strategy and trust that our efforts to provide constructive input will be reflected in the final Strategy. We are happy to meet with the team to discuss our submission.

Yours sincerely,

Elizabeth Elenius BA Earth Science (Land Management) Macq Uni 1979, Convenor



#### **RECOMMENDATIONS**

#### Direction 1

Recommendation 1 – Building heights in the 4 Key sites should be reduced to levels that complement existing building forms in Pyrmont and Ultimo.

#### Direction 2

Recommendation 2 – The push to boost jobs and economic growth should not dominate the development agenda and not be achieved at the expense of residential amenity. Recommendation 3 – We support a Metro station in Pyrmont.

#### Direction 3

Recommendation 4 – We reject the need for high rise hotel/residential development on the Star sites.

Recommendation 5 – We support street activation behind the ICC and Harbourside developments.

Recommendation 6 – Place planning should include a bus service to link the Peninsula with Broadway Shopping Centre, University of Sydney, RPAH and SFM.

Recommendation 7 – NSW Government to fund construction of the Maybanke Community Sports and Recreation Centre on the City of Sydney's Maybanke site. Recommendation 8 – The Tram Sheds/Harwood Building should be retained and repurposed to complement a revitalized Powerhouse Museum.

Recommendation 9 – The Plan should encourage provision of more foreshore dining venues on the Peninsula.

# Direction 4

Recommendation 10 – Responsibility for planning should be returned to the Minister for Planning and the City of Sydney with no departures from approved Master Plans, LEPs, and DCPs.

#### Direction 5

Recommendation 11 – Ownership of parks should be transferred to the City of Sydney. Recommendation 12 - use of open space on rooftops should not be permitted to disturb nearby residents.

Recommendation 13 – Property NSW should re-install the Curtain Call sculpture in Darling Harbour.

Recommendation 14 – We support provision of more green space and trees in Ultimo.

Recommendation 15 – Retain the oval on the greyhound racing site for community sports.

Recommendation 16 – Any plans for a multi-utility hub should not be on sites maintained by volunteers as urban bushland.

Recommendation 17 – The Bank Street Foreshore Park should be developed for public recreation and passive boating.

Recommendation 18 – Ownership of all public parks in the Peninsula should be transferred to the City of Sydney.

Recommendation 19 – Redesign Union Square to improve safety and suitability for outdoor events.



#### Direction 6

Recommendation 20 – Ensure any new entertainment/event venues do not reduce residential amenity and are located away from residential areas.

Recommendation 21 – Ensure provision of affordable new work places and appropriate space for community events.

Recommendation 22 – New spaces should integrate with the character of residential areas and meet the needs of local community.

Recommendation 23 – The Powerhouse Museum should be restored as a world-class museum with improved connection with the Tram Sheds/Harwood Building Recommendation 24 – If the former City of Sydney depot site (Fig/Wattle Sts) becomes available it should be purchased by the Dept of Education for a Junior Secondary School campus.

Recommendation 25 – Appropriately recognize First Nations' connection with the freshwater springs on the Western Escarpment in the design of the Bank Street Public Recreation Area.

#### Direction 7

Recommendation 26 – Extend Fig Street walkway directly to the CBD; we support a new road running from lights at Wattle Street to the Fish Markets lights; ensure traffic lights prioritise pedestrian movement; we oppose a pop-up cycleway in Pyrmont Bridge Rd from Wattle Street to the Pyrmont Bridge; we support the closure of Pyrmont St vehicular on-ramp to the W. Distributor; we support a ferry stop in Blackwattle Bay situated at the bottom of Quarry Master Drive; we support improved way-finding signage through the Peninsula.

#### Direction 8

Recommendation 27 – We support installation of sustainability measures and water recycling in all new or re-purposed developments.

#### Direction 9

Recommendation 28 – All existing Social and Affordable Housing in the Peninsula must be retained and additional such housing incorporated in appropriate new developments. Recommendation 29 – Establish a Steering Group with representatives from relevant government agencies, City of Sydney, Pyrmont-Ultimo Chamber of Commerce, local community groups and from a peak body or industry association to oversee PPS implementation.

## <u>Big Move 1</u>

Recommendation 30 – Incorporate ideas from the Park to Point Great Idea in the design of the Bank Street Foreshore Park.

#### Big Move 2

Recommendation 31 – We oppose expansion of 24-hour venue operation across the Peninsula but support new cultural and entertainment venues if residential amenity is assured.



## Big Move 3

Recommendation 32 – The Metro station entry must have minimal impact at street level and not located in Union Square.

# Big Move 4

Recommendation 33 – We support in principle multi-utility hubs in appropriate locations.

#### Big Move 5

Recommendation 34 – We support provision of more and better access to public open space.

## Big Move 6

Recommendation 35 – Expansion of residential and worker populations require provision of clinics and an ambulance station to provide for medical emergencies.

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Recommendation 37 – Provide a street level 24-hour police station within development associated with the proposed Pyrmont Metro station.



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#### APPENDIX A

7 April, 2020

Mr Steve Driscoll,
Project Leader,
Pyrmont Peninsula Place Strategy,
4 Parramatta Square,
12 Darcy Square,
PARRAMATTA NSW 2150

Dear Mr Driscoll,

## <u>Directions for the Pyrmont Peninsula Place Strategy</u>

Thank you for providing the opportunity for Pyrmont Action Inc. members to have their say on the draft Directions document, March 2020. The document has been circulated to all members and the comments below reflect the feedback I have received.

Before addressing the Directions, we have strong concerns about the inclusion of both Darling Harbour and Wentworth Park within the boundaries of the area under consideration by the team.

<u>Darling Harbour</u> is not part of Pyrmont/Ultimo (P/U). In fact, the latest developments in DH have effectively created a blank wall shutting off Pyrmont/Ultimo from DH and the CBD, reminiscent of the walls shutting off Israel from the West Bank. Darling Harbour has turned its back on P/U. It even shares the CBD postcode of 2000, not 2009 and 2007 applying to P/U. It has been and is being redeveloped in a rules-free planning environment and it is now too late to impose new height limits or any other constraint on developments recently approved (Cockle Bay) or under assessment (Harbourside) both of which will block views of the harbour and throw shadows across the water. Darling Harbour, in walling us off, has also built a huge barrier for the implementation of the Premier's "gateway to the CBD" vision for Pyrmont, unless she is envisaging the Medieval walled towns of yesteryear. Recent and proposed developments in DH should not be considered as precedents for new planning parameters and zonings in P/U.

The heights and other parameters of the new and proposed buildings in DH have been cited as justification for the imposition of a 61-storey tower at The Star Casino in Pyrmont (thankfully not approved). That rejection has been the trigger for this reconsideration of P/U's planning future, and that is a further reason for excluding DH from consideration of planning strategies for P/U. Such towers do not and will not "fit with the Peninsula's current and evolving character".

<u>Wentworth Park</u> is a reclaimed estuary sitting between the Pyrmont peninsula and Glebe which has a completely different character to the transformed Pyrmont/Ultimo precinct. In fact it is part of Glebe, not P/U, even though it is often counted twice as being in the open space provision in P/U, as well as part of Glebe's open space provision. Wentworth



Park is included as a Destination in the Bays Precinct Transformation Plan in which its future is described as providing a new type of shared activated public space for people to gather, socialize and interact; improving recreation and sporting facilities; taking advantage of stronger open space connections to the Bays Precinct; improving visual and physical connectivity to the Blackwater Bay Master Plan area and the water. We strongly urge the Department of Planning to leave the future of Wentworth Park to Infrastructure NSW's Bays Precinct planning team which has developed strong consultative links with the local communities of Glebe, Rozelle, Pyrmont and Ultimo.

<u>Direction 1 – Development that complements or enhances the area</u> – We would, of course, hope that any new development complements or enhances the Pyrmont Peninsula, and that new parameters which might arise from the development of this planning strategy respect its current character. The transformation of Pyrmont and Ultimo from an industrial precinct to a precinct which arose through planning instruments, including Master Plans, which stipulated zones for approved uses (commercial, mixed development, residential, public open space, etc.), and building parameters (height, FSR, building envelopes, etc.). These were produced with considerable public input, involving regular public meetings, convened by the City of Sydney, and attended by representatives of all the agencies with a stake in the redevelopment agenda. Whilst we recognize that P/U as it is cannot be preserved in aspic in perpetuity, it is crucial that the "evolution" is preceded by the establishment of clear planning parameters, developed in close partnership with those who currently live and work there. Once established, these rules must not be flouted by the Government designating sites as State Significant.

<u>Direction 2 – Jobs and industries of the future</u> – Whilst it may be advantageous to better link physically and economically with adjoining areas of economic activity, we point out that P/U already has a successful innovation district, including technology clusters, creative industries and tourist attractions. There are already strong linkages between institutions, including the SIT, UTS, the ABC and the Powerhouse Museum within the P/U precinct. But the physical linkages with the CBD and Darling Harbour could be improved (see comments on Direction 3 below). The Powerhouse Museum is a critical component of the P/U innovation hub, as well as a popular tourist attraction. It is located in its historical, technological and innovation context in Ultimo and should not be moved to Parramatta, nor its site, including the tram shed site sold to private developer interests. The Powerhouse is a venue to showcase Australian innovation and creativity and is accessible for travelers, including school groups who, in one excursion, can visit both the Powerhouse (in the South of the peninsula) as well as the Australian National Maritime Museum (in the North of the peninsula).

<u>Direction 3 – Centres for residents, workers and visitors</u> – We strongly support the addition of new, lively and attractive centres for everyone to enjoy. We have always sought for Pyrmont to be more than a dormitory suburb and support provision of new venues to attract Pyrmont workers to remain for after-work activities. We have strongly urged the inclusion of a cinema in new developments put forward by The Star, including the last major addition associated with the construction of the Darling Hotel. These requests have been rejected by The Star, as well as a request for inclusion of a community hall. We support the City of Sydney's proposal to encourage shops to remain open until 10pm



as they do in most big European cities, with access to cafes and restaurants, as well as entertainment. However, we do not support any expansion of 24-hour entertainment venues beyond the area currently designated as such (The Star, Pyrmont Bridge hotel precinct, and nearby Darling Harbour). The big disincentive for small businesses is the high city rent charged for often small spaces in heritage terraces.

At present, in our retail strips, we have a glut of hairdressers, real estate agencies and fitness centres, but few clothing or creative arts shops. Even the almost completed 21 Harris Street commercial building which will accommodate around 2,000 workers when fully operating has included a large fitness centre, but no small shops or food outlets such as Harris Farm Markets which would attract local patronage, as well as attract new visitors to the area – and thus create new jobs. The City of Sydney supports a community centre in Ultimo (funded through the Commonwealth's Better Cities Program) and a smaller centre in Pyrmont (a converted school building, also accommodating the SDN childcare centre). It has recently recognized the need to expand the Pyrmont Community Centre to support the very active Pyrmont community of more than 14,000 residents and over 16,000 workers.

There is a glaring absence of community sporting facilities to cater especially for the large cohort of young people, most of whom live in apartments. There are no full-sized public courts currently in P/U but two public courts are planned for inclusion in the proposed private development on the former Council depot site at Fig/Wattle Street. We have been seeking the redevelopment of the Maybanke community centre (owned by the City of Sydney) which effectively cannot be used as there is a lack of staffing for supervision, since 2006. The establishment of the Maybanke Sports and Recreation Centre would go a long way to compensate for the lack of outdoor sporting facilities, noting that nearby Wentworth Park is leased via the City of Sydney to large sporting clubs and is not available for community team sport. Such a centre would enable the establishment of local sporting teams – a great way to generate social cohesion.

<u>Direction 4 – A unified planning framework</u> – We certainly support clearer rules delivering greater certainty, especially for those who have already invested in their homes and/or commercial premises. At present, whilst we have a degree of certainty associated with the 2012 LEP and other instruments, these have now been overlain by new "visions" dreamed up by quangos such as the Greater Sydney Commission which now have to be taken into account by developers, and those commenting on new DAs or MODs. And to add to that, the NSW Government can, at any time, declare a site of State Significance, with all rules null and void. The 2012 LEP was developed in partnership between the Department of Planning and the City of Sydney, and involved genuine consultation via community meetings enabling us to identify anomalous zonings, etc.

And the planning processes have been further weakened by the changes to the Planning Act associated with planning assessment. Private certifiers, employed by development applicants, are now able to certify compliance with planning rules, with little or no oversight by either the City of Sydney or the Department of Planning. Recently, this reduction in "red tape" so favoured by the current Government, has led to the approval of four new entertainment venues operated by Doltone House (DH)



overlooked by large residential apartment buildings, with no intervention from either the City of Sydney or the Department of Planning. It has only come to light recently, that the City was unaware that it was the consent authority for DAs and MODs associated with Jones Bay Wharf and nearby buildings in Pirrama Road. The result has been a 4-fold increase in the number of patrons beyond that approved for the original DH venue, with a resultant increase in late night noise and disturbance to its neighbours, who were not notified of any of the new change of use proposals.

We would greatly welcome a rationalization of entities responsible for various elements of the planning process and support a return to the system whereby all but large developments are assessed and approved/rejected by elected local governments, with large developments assessed by the Dept of Planning. Private assessors should not be involved in approving any developments. We would also welcome a rationalization of Pyrmont public land ownership by government agencies, often inherited via some historical and now redundant use. For example, Bank Street and Pyrmont Bridge Road are both owned by RMS but all other roads, including Harris Street are owned by the City of Sydney. The parks in Pyrmont have ownership split between Property NSW, the Office of Strategic Lands, and the City of Sydney. Responsibility for all parks should be transferred to the City of Sydney under any new plans for the Pyrmont Peninsula.

<u>Direction 5 – A tapestry of greener public spaces and experiences</u> – One can only agree with provision of better spaces, streets and parks involving a rich canopy of trees and access to the foreshore. P/U are well behind in appropriate provision of public open space, especially away from the northern foreshore of the peninsula. The only area remaining for provision of additional public open space and improved access is along the Blackwattle Bay foreshore, including that associated with the new Sydney Fish Markets. The Blackwattle Bay Master Plan is under development by Infrastructure NSW. We support improvements in linkages between this precinct and the rest of the peninsula, and the CBD. At present, pedestrian access across the peninsula is impeded by a plethora of traffic lights (favouring vehicle movement), especially those associated with the Pyrmont Interchange in the Pyrmont Bridge Rd/Wattle St/ Bank Street area.

Apart from the Blackwattle Bay foreshore, we are at a loss to identify any sites for new parks, although it may be possible to provide a pedestrian walkway over the top of the Light Rail line, similar to New York's High Line, noting that some deep cuttings in the sandstone have heritage value. We definitely do not support inclusion of green spaces on the top of high rise buildings as provision of new public open space.

<u>Direction 6 – Creativity, culture and heritage</u> – The celebration of creativity, culture and heritage must involve the protection of all current heritage buildings, and those under consideration for such listing (eg the Powerhouse Museum building in Ultimo). We note that Property NSW has recently listed for sale heritage cottages in Scott and Cross Sts, Pyrmont. To do this at a time when the Department of Planning is developing a whole new planning regime for Pyrmont is totally inappropriate. We ask that they be withdrawn from sale and that their future protection assured. With the example of the proposed demolition of two heritage listed buildings in Parramatta to make way for the proposed



new Powerhouse Museum, we need an assurance that the heritage structures of Pyrmont/Ultimo won't suffer the same fate.

The Pyrmont History Group has recently launched its Pyrmont History website (www.pyrmonthistory.com) on which is assembled a great collection of images and stories from the past, including those of First Nations people. This may help the Department develop strategies which explore and celebrate their heritage, noting that Infrastructure NSW is working with a First Nations' consultancy, to assist in identifying ways in which reconciliation and truth telling can be incorporated in the development of the Blackwattle Bay Master Plan. Bays Precinct CRG members attended a recent workshop involving elders from the Glebe Estate community at which it was proposed to facilitate the building of linkages between the largely non-Aboriginal Pyrmont/Ultimo communities and members of the First Nations community at Glebe to work on appropriate strategies to achieve such outcomes in the development of the Pyrmont Peninsula Place Strategy.

<u>Direction 7 – Making it easier to move around</u> – With its narrow streets constraining traffic on the peninsula, greatly improved public transport is essential. Provision of a Metro station in Pyrmont is absolutely essential to serve both the current and any increased residential/worker populations of Pyrmont, as well as the new destinations proposed for the Blackwattle Bay Master Plan area, including the new Sydney Fish Markets (SFM). We have provided the team with a copy of the attached map showing our proposed site for the Metro station. We envisage that the station itself would be below ground, with only a modest exit point above ground, incorporating an escalator, stairs and, possibly, a lift. It may be possible to provide underground pedestrian links to The Star and Harbourside and to a point close to the new SFM.

Another long-sought active transport link is the extension of the Fig Street walkway from Harris Street direct to the CBD. This a vital piece of infrastructure that has long been resisted by RMS. At present one walks/cycles about 300m to the E end of the walkway to the lift and stairs down to Darling Harbour. The lift is regularly out of action so those unable to use the stairs have to turn around and make their way back to Harris Street and find another way into the city. Once in Darling Harbour, it is difficult to find signs to desired exit points into the city, but once out of DH one has to cross busy streets, wait for lights to change, thus adding about 5 – 10 minutes to a journey which should take about 10 minutes, if there was a completed direct link. This walkway used to run from Pyrmont to the CBD but was partly dismantled to make way for an additional bus lane into the CBD. We ask that this walkway extension be included in the Pyrmont Place Strategy.

The City of Sydney has suggested the undergrounding of the Western Distributor and this can only be strongly supported, even if it is possibly unrealistic. One of the major contributors to traffic congestion in Pyrmont, and even as far as Ultimo, is the Pyrmont Interchange which channels traffic on and off the Anzac Bridge to the West, and from the Western suburbs to the Sydney Harbour Bridge, as well as into and out of the CBD. Traffic is often brought to a standstill for long periods in Harris Street, effectively blocking entry into Pyrmont north of Pyrmont Bridge Rd. We have been advised by a staff member of the Dept of Transport, that there can be no increase in traffic on the Anzac Bridge as it has already reached capacity, when seeking information on the future traffic



impacts on Pyrmont and Ultimo when Westconnex is fully operational. The journey East along Pyrmont Bridge Road is equally congested in peak hours, with major pressure falling on its intersection with Harris Street. With any increase in major developments in Pyrmont, including the new Sydney Fish Markets, and the implementation of the Blackwattle Bay Master Plan, congestion in Pyrmont's narrow streets can only get worse. Major improvements in road and rail infrastructure provided before this happens is essential if the goals outlined in Direction 1 are to be achieved.

<u>Direction 8 – Building now for a sustainable future</u> – Any future development in Pyrmont and elsewhere must incorporate technologies that are carbon neutral, as well as water recycling measures and stormwater capture. As demonstrated during the corona virus shut-down, it is also imperative that all new developments have access to high-speed broadband services – and that means delivery of data by optical fibre technologies which must replace the ageing copper wires now delivering data from nodes to the new buildings. It is also imperative that every new building provides adequate power sources in car spaces allocated to apartments and to office carparks, to enable the charging of batteries in electric vehicles. It would be helpful if models could be developed for the retro-fitting of such apartment and office buildings now without such capacity. In addition, charging points should be strategically placed in the streets of Pyrmont and Ultimo to enable visitors to re-charge their vehicles, as required.

Direction 9 – Great homes that can suit the needs of more people – We are pleased that the Place Strategy team recognizes the importance of diversity in provision of housing in Pyrmont/Ultimo. P/U have a substantial amount of social and public Affordable Housing, but not yet the amount stipulated in former agreements associated with the first transitioning of the Pyrmont Peninsula. We seek a guarantee that ALL existing such housing will be protected and enhanced in its current locations. We have seen what happened at Millers Point where a whole community was summarily removed, including from the purpose-built Sirius building, to make way for wealthy private owners. This must not happen in P/U. Photos widely publicized by Urban Taskforce appear to depict new high-rise buildings constructed on such public housing sites in P/U. Public housing tenants have integrated well with more recent arrivals in Pyrmont and we all work together on projects to both enhance Pyrmont's amenity, and to assist those who are disadvantaged such as the homeless. We have an amazinaly strong and diverse community in Pyrmont and in Ultimo, and these bonds must not be allowed to break through this proposed second "transformation" of the Peninsula. We recommend the provision of additional social and Affordable Housing in P/U as part of the Pyrmont Peninsula Place Strategy.

<u>Direction 10 – A collaborative voice</u> – The best way to achieve a "cohesive, agreed approach to bring about the best outcomes for Pyrmont Peninsula" is to include community representatives in its development, and "collaborative government". This Direction lists local and state (governments?), not-for-profit and the private sector reaching agreement on "priorities, funding and programs", but does not define the role of the community in planning for the future of this place we call home. Any governance model considered by the Place Strategy for Pyrmont/Ultimo must establish a meaningful role for community representatives in the proposed collaboration. Without their



participation there is little prospect of full community acceptance of any strategy that arises from deliberations which exclude them.

We trust that this submission will assist the Pyrmont Peninsula Place Strategy team in its development of plans for the future of our Place.

Yours sincerely,

Elizabeth Elenius, Convenor

### Recommendations

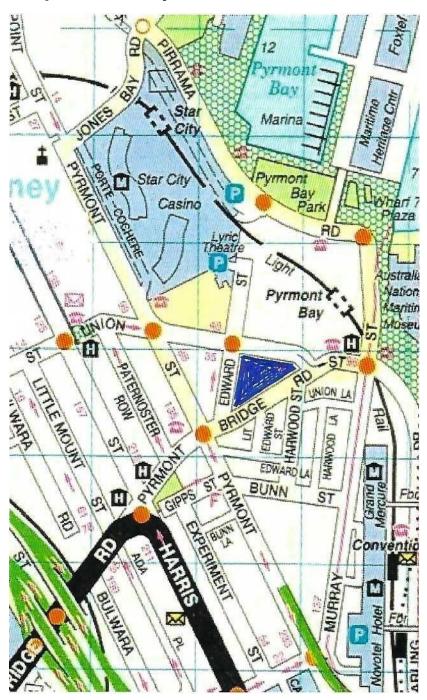
- (1) Adjust the Place Strategy boundary to remove Darling Harbour and Wentworth Park from the area under consideration
- (2) The proposed evolution of development on the Pyrmont Peninsula must be preceded by the establishment of clear planning parameters developed in close partnership with those who currently live and work there and, once established, not flouted by either the government or development proponents
- (3) Whilst there are already successful clusters with linkages both within the study area and to areas beyond, there is room for better physical and economic linkages within the Innovation Corridor
- (4) The Powerhouse Museum including the tram shed site is a key institution within the Innovation Corridor and should remain in public ownership in Ultimo
- (5) We support the addition of new, lively and attractive amenities including more shops, cafes/restaurants and entertainment, eg a cinema but oppose the expansion of 24-hour entertainment venues beyond those currently operating.
- (6) Expansion of amenities should include the redevelopment of the Maybanke community centre site as a Sports and Recreation Centre to support the development of local team sports for residents and workers
- (7) We support clearer planning rules to deliver greater certainty for those who have invested in homes and/or commercial premises; these rules to be developed in partnership with the City of Sydney and the P/U communities
- (8) We recommend that future DAs and MODs be assessed by the City of Sydney, with large projects being assessed by the Department of Planning; assessment by private certification should be abolished.
- (9) Public land ownership should be simplified by transferring ownership of all parks in P/U to the City of Sydney
- (10) We support provision of better spaces, streets and parks and access to the foreshore but reject the inclusion of green spaces on the top of high rise buildings as provision of new open spaces
- (11) Whilst we support improved access between the Bays Precinct and the rest of the Peninsula, development of the Blackwattle Bay Master Plan should be the responsibility of the Bays Precinct team in Infrastructure NSW which has established a workable means of community consultation via the Bays Precinct CRG;
- (12) All current heritage buildings and those under consideration for such listing should be protected from future development



- (13) Development of the Pyrmont Peninsula Place Strategy should be conducted in consultation with First Nations representatives to ensure incorporation of appropriate measures to facilitate reconciliation and truth telling
- (14) A Metro Station must be situated in Pyrmont to serve current and future residents, workers and visitors to P/U (see map attached)
- (15) Provision of an extension of the Fig Street walkway to the CBD is essential to provide improved pedestrian/cycle/wheelchair access from P/U to the CBD
- (16) Major improvements in road infrastructure, in particular that associated with the Western Distributor, are required to reduce traffic gridlock in P/U
- (17) The Place Strategy must mandate sustainability measures including clean power, water re-use/stormwater collection, and power for re-charging electric vehicles in residential apartment and commercial buildings and in street locations
- (18) Retain all existing social and Affordable Housing in P/U; new developments must contribute towards provision of additional public housing in P/U
- (19) The Pyrmont Place Strategy governance model must include a meaningful role for community representation in the proposed collaboration with other agencies



# Proposed Pyrmont Metro Site





Elizabeth Elenius, Convenor 9C/2 Bowman Street PYRMONT NSW 2009 Tel: 9571 9727; 0409 552 117 Email: eelenius@bigpond.net.au

#### **APPENDIX B**

28 May, 2020

Mr Geoff Gerring, Infrastructure NSW, Level 12, 19 Martin Place, SYDNEY NSW 2000

Dear Mr Gerring,

## Blackwattle Bay Master Plan

We have been represented on the Bays Precinct CRG which reported to the then Government in 2010, and have also engaged extensively at all events and meetings, including those of the current Bays Precinct CRG, since 2015. We have written in support of the plans for the new Sydney Fish Markets and have accepted that development will occur on the current Sydney Fish Markets site and in Bank Street. We have also attempted to provide constructive input to the Master Plan, including participating in the development of the Pyrmont community's Great Idea for the Bank Street Public Recreation Area.

We appreciate being given the opportunity to comment on the Revitalising Blackwattle Bay document which outlines 3 possible scenarios for this significant area of the Western Harbour foreshore but are of the view that events have overtaken the planning which make it impossible for us to comment on either the scenarios, or the premises upon which they are based. You will be aware that in 2019 the Premier instructed the Greater Sydney Commission to undertake a rushed review of the planning parameters for the Pyrmont Peninsula which made a number of recommendations to guide the Department of Planning, Industry and Environment in preparing the Pyrmont Peninsula Place Strategy, directions for which were placed on exhibition in March 2020. It is expected that the strategy will be delivered in September 2020, around the same time that the Blackwattle Bay Master Plan will be submitted to the Department of Planning Industry and Environment (DPIE).

In addition, NSW and Australia are responding to measures required to protect us from and to prevent the spread of Covid-19. This has resulted in most of those still in work working from home, deploying new web-based methods of work participation. A consequence of this is a dramatic fall in demand for office space and it is likely that many workers who previously commuted to the City, will be able to work, at least part of the time, from home. It is our view that it is premature to consider the development that may be required post-Covid-19, and the assumptions upon which the scenarios are based, in particular the number of jobs, will need to be reviewed. We also note projections prepared for the *Sydney Morning Herald* by SGS Economics and Planning which show Sydney will add only 15,600 people next financial year if the economy does not recover quickly from the coronavirus-induced downturn (Matt Wade, SMH, 26 April, 2020) but as this development cannot proceed before 2024 when the new Sydney Fish



Markets is completed, the demand situation may have increased again. The best that can be said is that Covid-19 has created uncertainty which may require the demand projections to be reviewed.

It is therefore our view that these scenarios can only be discussed in the context of the overall *Pyrmont Peninsula Place Strategy which*, we trust, will take into account a post-Covid-19 world which will change the way we live, work and recreate.

Notwithstanding the above, we offer the following comments which may help in the delivery of a Blackwattle Bay Plan which can achieve Direction 1 in the PPPS currently under development – **Development that complements or enhances the area and which fits with the Peninsula's evolving character, sitting comfortably with terrace housing, smaller shops and heritage areas** once this Strategy is finalised.

- We reject the comparison of the form and height of the towers, proposed in all 3 scenarios, with those of the CBD and Broadway. Pyrmont and Ultimo are NOT the CBD (noting that Darling Harbour shares the CBD postcode and can be considered as such as it turns its back on Pyrmont and Ultimo).
- If Pyrmont is to be developed in a way that complements and enhances the area, it can result in revitalization that presents a transition precinct sitting between the excessive building height prevailing in the CBD which turns its narrow streets into dark canyons, and the low-rise, heritage character of Glebe.
- Clearly the towers proposed in the 3 scenarios are the antithesis of the buildings which are in close proximity to the old SFM site. No building exceeds 10-storeys, with heritage terrace houses lining Bulwara Road.
- Nearby Harris Street, with its mix of converted wool stores, terrace houses and
  more modern residential and commercial buildings is the peninsula spine
  connecting Pyrmont with Ultimo and the Haymarket which are both essential
  parts of the history and culture of Sydney. Whilst it is narrow, the scale of buildings
  which front it allows light into the street. This is the character of Pyrmont which
  should inform any new development, including Blackwattle Bay.
- There continues to be no plan to manage the increase in traffic and demand for parking that can be envisaged to follow the opening of the new SFM, as well as the proposed increase in the numbers of workers and residents moving to the area. The Department of Transport has recently re-confirmed that it has no plans for an additional bus service, and stated it will not make a decision about a Pyrmont Metro stop until the end of 2020. Place planning requires provision of essential social and physical infrastructure alongside the delivery of residential, commercial and retail development.
- Currently, Pyrmont and Ultimo are both short-changed with regard to open space provision. Wentworth Park is in Glebe and is counted as part of its open space allocation, and it is largely leased to major sporting codes, with space already at a premium for use by local school children. With a significant increase in both resident and worker populations foreshadowed, as well as increased visitors to the area, demand for space for active and passive recreation will also increase. A high proportion of residents live in apartments with no room to exercise, so it not unreasonable to plan for adequate open space allocation over and above



30,000 sq.m which applies to all scenarios. It is currently unclear as to how much of the waterfront promenade is included in this figure. Advice from Infrastructure NSW is that it is included in the 30,000 sq m figure where parks are shown (p21 Revitalising Blackwattle Bay), but not included along the waterfront which is currently privately owned.

- We have been involved in consultations and discussions regarding the Public Recreation Area in Bank Street since 2004. We had input to the 2006 Bank St Master Plan which dedicated the area to non-motorised craft and parkland. This plan was scrapped by the incoming Coalition government, but we continued to engage with RMS (formerly Maritime Services) which reached an agreement to transfer the site to the City of Sydney. Currently the proposed parkland has been alienated by the development of a marina for party boats. The scenarios now envisage 2 marinas operating from or close to the public recreation area. We accept the proposed day charter marina operating from 1 Bank Street, but recommend that the proposed corporate charter marina be relocated to the position of the potential ferry stop at the bottom of Miller Street. That ferry stop could be located at the end of Quarry Master Drive, thus providing more space for the dragon boaters to manoeuvre their craft. It is essential that the lease of the temporary (5 years) marina **not be** extended, and the structures removed. The local residents and passive boaters must be involved in the more detailed planning for a park on the rest of the site zoned public recreation area.
- Given traffic congestion which affects roads near the Pyrmont Interchange, we support the vehicular site access proposed in Scenario 1 which runs from lights at the Wattle St/Pyrmont Bridge Road intersection through the site to the lights at the Fish Markets light rail station. This would cut out two sets of lights which hold up drivers, cyclists and pedestrians who wish to access streets to the east and north of the peninsula. If required, this could be designated for local traffic only.
- It is unclear what provision is being made for Social/Affordable Housing, and for cultural and social infrastructure, noting that the Department of Education has not taken into account any future demand for spaces associated with the Bays Precinct planning (and now the PPPS developments) at the new Ultimo Primary School. It is also noted that students from Ultimo Primary School are excluded from the boundaries of the new High School near Central. We are unaware of any plans to accommodate additional students in the Blackwattle Bay Secondary College, with campuses in Leichhardt, Balmain and Glebe.

We recommend that work continue on the vital traffic and transport planning, and on the Bank Street park and dragon boat facilities (there is immediate and current demand for those facilities) but that further consideration of the scenarios as presented be put on hold while the DPIE develops its Pyrmont Peninsula Place Strategy. Work should also be undertaken on re-examining the assumptions upon which the plan is based – numbers of jobs and homes - in the light of the Covid-19 experiences. But, further consideration of the form and character of the scenarios must wait until the PPPS is finalized.

Yours sincerely,

Elizabeth Elenius, Convenor



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#### APPENDIX C

14 April, 2020

The Director,
Key Sites Assessments, Planning and Assessment,
Department of Planning, Industry and Environment,
Locked Bag 5022,
PARRAMATTA NSW 2124

Dear Director,

Amended Concept Proposal for the Harbourside Shopping Centre Redevelopment

Pyrmont Action Inc., in its submission (1/2/17) on the original Concept Proposal, opposed it on the following grounds:

- It represents the privatization of a site designated in 1988 to operate as a Festival Market as part of a Darling Harbour gifted to the people;
- The proposal should be evaluated on cumulative impact grounds not in isolation
  of what may evolve in the development of future planning strategies in
  Pyrmont/Ultimo, and rejected on the grounds that it sets a building envelope
  precedent,
- The scale of the project
- Traffic and transport impacts
- Pedestrian/cyclist access
- Need for a retail strategy which activates ground level frontages and addresses
  the needs of the local communities, and provision of social infrastructure,
  including additional Affordable Housing (public), childcare, health, sporting and
  aged care, possibly through developer levies
- Heritage impact on the Pyrmont Bridge

Since 2017, a number of actions have been taken by the NSW Government which can influence the outcome of the assessment of this proposal:

- The Cockle Bay concept plans for its redevelopment have been approved
- The proposal for a 61-storey hotel/residential tower on the site of The Star has been rejected, noting that its excessive height was partly justified by citing the heights of the ICC Hotel and the proposed height of the initial Harbourside redevelopment concept plans;
- The rushed GSC Review of planning in the adjacent Pyrmont/Ultimo Peninsula which quickly followed that rejection, and the current (equally rushed) development of a Place Strategy for this area

We note that adjustments have been made to the proposal, in response to the 171 submissions from government agencies, organisations, the City of Sydney and the general public. We address them as follows:



Relocation of the tower from the north of the site to the centre of the site – Whilst the relocation to the centre of the site improves the view impacts on the adjoining hotel and 50 Murray Street, still it not only blocks some views, but increases the potential of overshadowing of apartments as far away as Pyrmont and Bunn Streets.

<u>Setting back the tower envelope from the waterfront by 32m</u> – This results in the tower being even closer to the S-E precinct of Pyrmont which has an entirely different architectural character.

Reduction in height of the tower by 12.6m – The attached photos of the architectural model depict very graphically the scale of the tower which is even taller than the ICC Hotel. Good planning would require any development to the north of the ICC Hotel, to be lower in height as the landscape tapers towards Sydney Harbour, and much more in harmony with the height of buildings immediately adjacent in Pyrmont. The Crown development at Barangaroo demonstrates the inappropriate (downright ugly) visual impact of a dramatic increase in height to the north of the Master Planned development to the south which blends into the background of CBD buildings when viewed from the west. And, in assessing the visual impact of the proposed 61-storey tower on the site of The Star Casino, both independent architectural assessors, rejected such a tall building so close to the northern end of the Peninsula.

It is quite clear that the RtS only looks at the relationship of both the tower and podium with the building heights prevailing to the south, east and north-east of Darling Harbour (Fig 8, RtS). There has been absolutely no acknowledgement of the complete lack of relationship with the character and forms of development in Pyrmont and Ultimo nor of the tower's impact on the amenity of those living and working in P/U, especially to the SW of the Harbourside site, through overshadowing. It also creates a dangerous precedent which can be used by the developer lobby to justify towers of similar scale in P/U, in direct contravention of Direction 1 of the Directions for the Pyrmont Peninsula Place Strategy (March 2020, NSW Dept of Planning). This recommends development which complements or enhances the area, not the destruction of P/U's character as a mixed low to medium height precinct which includes a significant heritage component, located between the extreme high-rise character of DH (a rules-free precinct) and the CBD of which DH is a part, and the heritage, low-rise character of Glebe.

Reduction in height of the northern portion of the podium envelope by 5.5m – Whilst a small section of the podium immediately next to the Pyrmont Bridge has been reduced in height, it is apparent (Figs 1 and 3, RtS) that the rest of the northern section of podium is several storeys above the height of the bridge and appears to be cantilevered over the boardwalk to the north and east. This will partly obstruct views of the harbour from 50 Murray Street even in apartments as high as level 9 and this loss cannot be compensated by provision of a green area on the roof which will be inaccessible to the public. The podium will completely block apartment views from levels 3 and 4. We continue to oppose both the height and bulk of the podium and ask that its scale not exceed that of the existing structure.



<u>Removal of tower flange</u> – We strongly support the removal of the flange from the concept plan but still consider the tower too high and with an excessive footprint.

Reduction in massing of envelope along the waterfront promenade – Whilst it appears that there is an increase (from the initial concept plan) in the width of the promenade in the centre of the site, it appears to be considerably narrower than as at present. Table 3, p34 RtS) depicts a wide plaza in front of the central section of the existing Harbourside complex, although it is noted that the northern and southern ends of the promenade have been widened. In effect, the existing public plaza has been reduced to a walkway, rather than a public space where people can gather. Even with the increases in width of the northern section from 11.2m to 14m and the increase of the southern section from 10.8m to 20m do not compensate for the loss of the plaza area. Indeed, the slightly wider northern section appears overwhelmed by the cantilevered and higher northern section of the podium.

In fact, all the new, and proposed developments around the foreshore of DH have (and will) create a walling off of the water and massing along the entire waterfront promenade. The sheer scale of the proposed Harbourside development will not enhance the current openness of the site, but effectively wall off the public domain and any tenuous remaining visual connections to P/U entirely.

Addition of a new central through-site link from the waterfront to Bunn Street – We support this linkage.

We will now address in more detail the issues of major concern to our members:

Overshadowing – Almost the entire focus of the analysis of overshadowing impacts (Section 2.5, pp 24-25 RtS) is its impact on the public domain within Darling Harbour. No analysis is presented regarding the overshadowing impact on private residences to the SW of the site. The Response acknowledges that there will be impacts (albeit slightly reduced in scale) on the public domain in DH especially over the key lunch time period, stating that from 2pm onwards the shadow impact of the amended proposal will fall on the water and onto the S portion of the DH waterfront. There is no analysis of the cumulative impact of the overshadowing of the water by the Harbourside development, together with that of the Cockle Bay redevelopment. The only private residential building analysed to the West and SW of the proposed development was 50 Murray Street. The rest of Pyrmont has been ignored. There is no analysis of shadow impact on Pyrmont private and public spaces in the summer months. The scale (height and bulk) of this development is likely to result in overshadowing of homes in Bunn, Murray and Pyrmont Streets in Pyrmont, particularly on winter mornings, and for this reason should be significantly reduced.

<u>Visual Impact and View Loss</u> – The ICC hotel already has generated a visual impact, especially when viewed from Pyrmont. Its excessive height in no way justifies the imposition of yet another, taller tower on the P/U precinct community. The rejection of an even taller (61-storey) tower on The Star Casino site was justified on the grounds of its visual impact, as well as its inconsistency with planning parameters relating to its site. The



complete absence of such parameters in DH should not give the proponent carte blanch to impose such a significant visual impact on its neighbours and further afield. The height of the tower should be reduced to align with the scale of buildings in Pyrmont, not the CBD.

Again, the RtS (pp 28-29) restricts its analysis of view loss to areas to the East, and DH, relating the height of the tower to those in the CBD and disregarding the scale buildings in the neighbouring precinct of Pyrmont to the West. Whilst the relocation of the tower to the centre of the site has reduced the view losses from 50 Murray Street, the height and width of the northern podium blocks views from levels 3 and 4 apartments, and partially obstructs the water views of upper levels of the apartment building. The height and scale of the podium should be reduced to ensure no loss of amenity to the adjoining apartment buildings.

<u>Land Use</u> – The development is described as mixed-use, incorporating residential, commercial and retail spaces. There is no mention of provision of much-needed community amenities, nor attractions which would encourage workers in P/U and elsewhere to remain in the precincts after work. Such amenities could include replacement of popular courts which were removed from DH when the Sega Centre was constructed; and an indoor cinema. We support provision of retail space, which offers an affordable range of goods, attractive not just to visitors, but to members of the P/U communities, noting that the nearest urban shopping centre (apart from the CBD) is Broadway. There is no direct public transport to Broadway from Pyrmont and none planned. In planning for the retail space, we strongly support ground level activation from the promenade and Darling Drive, particular for dining venues, rather than indoor venues.

We see no justification for the delivery of additional commercial office space in this area which was dedicated to the people of Sydney. Such provision is in contravention of the 1988 lease of the site which stipulated its uses to include retail, restaurant, tavern, entertainment and refreshments. Indeed, there may well be a significant increase in people choosing to work from home, as a result of experience of such gained during the corona virus pandemic. Removal of the commercial space provision would enable reduction of the height and scale of the podium such that it reduces negative view impacts and enables an increase in space along the foreshore.

With regard to the residential provision, we agree with the City of Sydney's view that it is in a position to meet the NSW Government housing targets for residential dwellings without the provision of housing on the site (RtS p 29). We fail to see how provision of residences will provide for the housing needs of the community, particularly affordable housing. Yes, there is a critical shortage of Social and public Affordable Housing, and we would support such provision in this development, but there is no evidence provided that this is the intent, and no definition of "affordable" within Section 2.7.2 of the RtS. It is unclear whether the inclusion of a contribution to provide affordable housing which will help low-income workers in the community (p30) refers to provision of a developer contribution towards provision of Affordable Housing, or is a genuine inclusion of such within the Harbourside development to enable low income workers to live close to where



they work in a sustainable, innovative and respectful existing neighbourhood. We would strongly support provision of up to 4 levels of publicly operated Affordable Housing within the proposed development. As stated above, we would support provision of a variety of privately owned apartments within a tower which is substantially reduced in height and scale.

<u>Iraffic and Parking</u> – We note the provision of an additional 11 parking spaces to total 306 spaces within the basement of the podium, incorporating 3 levels of parking, and that the existing spaces below the Novotel Hotel car park will be retained for retail/commercial car parking. We also note that entry to the residential carpark will be via the loading dock entrance off Darling Drive.

Analysis of traffic impact is based on a more recent traffic survey completed in January 2020. Such analysis can hardly have validity as this period was atypical in that it was held (a) in the school holidays; (b) during a period when tourism and outdoor activity was adversely affected by smoke from the bushfires, the extreme heatwave, followed by flooding rains; then (c) the slowdown in all activity associated with the corona virus. As in our 2017 submission, we continue to urge a traffic study which examines the cumulative impact on traffic in the Pyrmont Peninsula of not just this development, but that associated with the development of the Pyrmont Peninsula Place Strategy being undertaken by the Department of Planning, and the development of the Master Plan for Blackwattle Bay being undertaken by Infrastructure NSW.

With regard to public transport, whilst we note the improvement in frequency of light rail service to approx. 8 minutes for the whole day, it is our experience that the carriages are still packed with passengers, thus demonstrating unmet demand for improved public transport to service DH, Pyrmont and Ultimo. We strongly support the provision of a Metro Station in Pyrmont, in a central location to enable it to serve Darling Harbour, The Star, and the new Sydney Fish Markets and Blackwattle Bay redevelopment.

<u>Design Principles</u> – Once again, the design principles outlined in 3.2 p41, only consider the development's scale and relationship to its immediate context, ie DH and the CBD. We reject completely the statement that the new residential tower.... responds to the surrounding context of tall buildings and appropriately manages building separation, view sharing and overshadowing considerations. Currently, there are no tall buildings of a similar scale and height of the proposed development located on the Pyrmont Peninsula and we strongly reject any suggestion that the proposed Harbourside tower and podium improve public amenities and provide a public domain with social, green infrastructure for human comfort.

In 2017, we rejected the proposed development outright. Since that time, we are prepared to accept a compromise proposal which:

- Is reduced in height and scale to complement the scale and character of the built environment of Pyrmont;
- Does not compromise existing views



- Does not overshadow properties in SW and W Pyrmont, nor the waters of Cockle Bay
- Does not generate adverse visual impacts from Pyrmont and Sydney Harbour
- Avoids setting a height principle for future developments in Pyrmont, including any developments at The Star Casino
- Includes 4 levels of publicly managed Affordable Housing
- Does not include commercial space
- Is supported by provision of adequate public transport
- Includes provision of social infrastructure, including public courts and an indoor cinema

The overwhelming message contained in this much-delayed Response to Submissions is that the impact of the proposed Harbourside redevelopment on the Pyrmont community is irrelevant and not even worthy of assessment. We have noted the extensive consultation with government departments, the adjacent hotel operators and the Strata Committee of 50 Murray Street. We also note the workshops conducted with Prof Peter Webber and the Department staff. This would have been an ideal mechanism for community engagement and we are still very prepared to work with the Department and proponent to achieve an outcome which enhances, rather than detracts from the amenity enjoyed by the residents and workers of, and visitors to the Pyrmont peninsula.

Whilst we have provided this submission within the time-frame permitted, we strongly recommend a delay in the whole assessment process, including more time for public consultation, as the exhibition period coincides with the social isolation of the public on account of the corona virus. Mirvac has waited for three years to unveil its amended concept plan, a few more months to enable full community participation should not have a significant impact on its timetable.

Yours sincerely,

Elizabeth Elenius, Convenor





Fig 1 – Height Impact viewed from West

Fig 2 – Height comparison with 50 Murray St



# **APPENDIX D**



# **PYRMONT**ACTION



PARK TO POINT: BANK STREET WATERFRONT DISTRICT

CRAWFORD ARCHITECTS PTY LIMITED 2015

# **PYRMONT**ACTION

- --- COUNCIL OF ULTIMOPYRMONT ASSOCIATIONS CUPA
  --- CULTURE AT YORK
  --- DRAGON BOATS NSW DBNSW
  --- OZHARVEST
  --- PYRMONT COMMUNITY BANK
  --- PYRMONT COMMUNITY GROUP PCG

- -- PYRMONT HERITAGE BOATING CLUB PHBC
  -- PYRMONT ULTIMO CHAMBER OF COMMERCE PUCC
  -- SYDNEY HERITAGE FLEET SHF
  -- ULTIMO VILLAGE VOICE UVV



PARK TO POINT: BANK STREET WATERFRONT DISTRICT

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