



BLACKWATTLE BAY STATE SIGNIFICANT PRECINCT

Summary of Submissions

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Acknowledgment of Country

The Department of Planning, Industry and Environment acknowledges the Traditional Owners and Custodians of the land on which we live and work and pays respect to Elders past, present and future.

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Executive Summary

This report provides an overview of the submissions received during the formal exhibition of the State Significant Precinct Study, proposed masterplan and draft planning controls, prepared by Infrastructure NSW for the Blackwattle Bay State Significant Precinct. The report outlines the issues raised by individual members of the public, community groups, stakeholders and NSW government agencies in over 2400 submissions. Issues raised in individual submissions have been categorised into five key areas: Built Form, Environment, Planning and Process, Movement and Place. This report summarises the matters raised by the community for consideration by INSW.

The SSP Study and supporting documents were formally exhibited by the Department of Planning Industry and Environment from 2 July to 20 August 2021, including an extension of 2 weeks following a request from the Lord Mayor of Sydney and the broader community. During the exhibition the Department received 855 individual submissions, 38 submissions from government and non-government organisations, and 1513 proforma submissions.

Detailed analysis was carried out summarising community submissions to identify and numerate the issues raised. The analysis of the submissions identified key themes which have been used to categorise the submissions. These themes are Built Form, Environment, Planning and Process, Movement, and Place.

Built Form

The built form theme was raised in 29% of total comments, demonstrating a significant level of interest from the community. Objections to excessive building heights was identified as the most commonly occurring issue, raised in 58% of all submissions. The other key matter raised by the community included the impact of the proposed development density and bulk with 59% of submissions raising concerns. This concern included objections relating to the visual appearance of building bulk and the ability of the site to accommodate a large new population of workers and residents as well as the existing population. Further built form impacts referenced included reduced or limited solar access, loss of views and the need for taller buildings to be setback further from the foreshore.

Submissions by special interest groups EcoTransit and the National Trust and community groups including Pymont Action Inc raised concerns regarding excessive density and height. Further to this Jamie Parker MP, Member for Balmain, raised concerns that the built form failed to respond to the local character of Pymont and the waterfront context seeking reduced heights and greater setbacks from the waterfront.

Environment

Environment and open space included was raised in 26% of total comments. This theme was dominated by issues including concerns regarding the extent of overshadowing of open space and public domain which were raised in 38% of submissions. Concerns about the limited amount of open space were raised in 36%. Other issues raised in this theme included the importance of the foreshore promenade and the proposed dimensions and quality. Wind, noise and air quality impacts were also raised, including the impact on amenity of the foreshore, open space and residential uses within and around the precinct. Significant numbers of submissions also raised concerns about the limited response to sustainability incorporated into the precinct design and draft planning controls.

The NSW Environment Protection Authority raised concerns regarding air quality and noise generated by traffic on the Western Distributor as did the Kent Street Residents Group, Overshadowing and wind impacts on public areas was raised by a number of community groups including Pymont Action Inc, Coalition of Glebe Groups, Millers Point Community Residents Action Group and Kent Street Residents Group.

Planning and Process

Approximately 18% of total comments discussed the strategic planning merit and process for the rezoning. This theme included comments on the use of public land, the need for infrastructure contributions and social and affordable housing, the proposed land use mix and consultation processes. The need for development of public land to deliver greater public benefits was raised in 27% of submissions. Infrastructure and contributions was raised in 28% of submissions, including the need for community facilities and State and regional infrastructure such as schools. The need for a greater contribution to social and affordable housing was raised in 22% of submissions. The proposed land use mix was raised in 14% of submissions and 9% of submissions objected to the proposals lacking response to non-statutory consultation feedback.

The Greater Sydney Commission recommended the preparation of a holistic infrastructure contributions framework to accompany the proposed rezoning. Collaborative planning for infrastructure was recommended by Inner West Council and the City of Sydney who also noted the importance of alignment with the Pyrmont Peninsula Place Strategy regarding land use and infrastructure arrangements.

Movement

Comments regarding the movement network made up 17% of total comments including comments on traffic and roads, public transport, the pedestrian and cycle network and parking. Congestion on traffic and roads was raised in 29% of all submissions with many noting that the road network was already highly congested. The need for improvements to pedestrian and cycle networks was raised in 14% of submissions. Feedback on public transport needs noted crowding on existing bus and light rail services and the lack of ferry services as well as the distance between the precinct and the anticipated Pyrmont Metro station. Parking concerns were noted in 14% of submissions with concerns regarding the impact of new residents and visitors to the precinct on on-street parking availability.

Government and non-government organisations raising concerns regarding the movement network included local resident groups with concerns regarding increased traffic congestion and pressure on on-street parking. Furthermore, Member for Balmain, Jamie Parker, objected to the proposed density noting cumulative impacts on traffic, public transport and parking. The City of Sydney noted that a near-zero parking rate would be appropriate for the site and would align with ambitious mode-share targets.

Place

Place as a specific theme was raised in only 9% of total submission comments and included heritage and indigenous heritage, view impacts, place character, and recreation opportunities. Over 10% of submissions raised concerns regarding the impact on views of Pyrmont Peninsula, the Sydney city skyline and Sydney Harbour. Heritage impacts including concerns regarding the response to the heritage qualities of Pyrmont, industrial heritage of the Bays and impacts on the Anzac Bridge were raised in 5% of submissions. Aboriginal cultural heritage and aboriginal issues were raised in 3% of submissions.

Project Overview

Planning for Blackwattle Bay State Significant Precinct commenced in 2017 when Study Requirements were issued by the Department of Planning, Industry and Environment (Department). Governance arrangements for the precinct include a collaborative working group including staff from the City of Sydney, Transport for NSW, NSW Office of the Government Architect, and attended by INSW. An advisory Project Review Panel (PRP) comprising executive representatives from the same agencies is convened at key milestones to provide recommendations and advice to the working group.

In March 2021, Infrastructure NSW (INSW) lodged the State Significant Precinct Study (SSP Study) including a proposed masterplan, draft planning controls and 38 supporting studies. The proposed masterplan included provisions for:

- Renewal and relocation of the Sydney Fish Market to accessible, world-class facilities that will foster tourism and trade;
- A foreshore promenade and 30,000 square metres of public open space will connect Glebe to Pyrmont, providing recreation opportunities and allowing people to easily walk and cycle between the two areas;
- 1,550 new and affordable dwellings; and
- New commercial and retail spaces delivering an estimated 5,600 permanent jobs.

Following lodgement the SSP Study, the proposal underwent a Test of Adequacy to determine whether the proposal addressed the Study Requirements and was suitable for exhibition. Following Test of Adequacy the proposal was exhibited for 7 weeks.

This Summary of Submissions provides an overview of the submission issues which will inform INSW's Response to Submissions (RtS) which may include modifications to the SSP proposal. Once lodged, the RtS and the SSP proposal will be assessed.

Exhibition Process

The Blackwattle Bay SSP Study, including an Explanation of Intended Effects setting out the proposed planning controls, a masterplan and series of supporting technical studies were publicly exhibited from 2 July to 20 August 2021. This included a 2-week extension to the exhibition period in response to requests from City of Sydney Council and the broader community.

The exhibition of the SSP Study was formally notified via direct mail to 13,672 local addresses within Pyrmont, Ultimo, Forest Lodge, and Glebe.

Notification letters were email to all relevant NSW Government agencies and representative bodies including:

- Ambulance NSW
- Ausgrid
- Create NSW
- Department of Education - Schools Infrastructure NSW
- Environment Protection Authority
- Health NSW
- Heritage NSW
- Water NSW
- Metropolitan Aboriginal Land Council
- NSW Police
- Office of Environment and Heritage (Heritage)

- Place Management NSW
- Port Authority of NSW
- Sydney Water

Exhibition documents were available online on the Department's planning portal website and an email update was sent to registered contacts to advise of exhibition. INSW undertook a range of engagement activities during the exhibition period including:

- Briefings of City of Sydney Councillors;
- Webinars giving an information session followed by question time focussing on general outline of the SSP (20 July), Traffic, Transport and Harbour Uses (22 July), Community Heritage and Culture (26 July), Environmental Considerations (27 July);
- Postcards outlining exhibition and engagement activities;
- A call-back service to respond to questions from the public following webinars;
- Stakeholder briefings including the Community Reference Group;
- Two emails to the project electronic distribution list of 2,380 people was distributed on 6 July and 6 August 2021 advising of the exhibition, where to view the documents, and how to make a submission; and
- A Guide to the SSP Study document and 'How to make a submission' flyer was produced and hosted on the INSW website and included in all outgoing communications to help readers navigate the documents on exhibition. The INSW website also included a link to the DPIE website and the webinar videos throughout the exhibition period.

INSW undertook additional non-statutory consultation in May - June 2020 prior to submitting the SSP, the outcomes of which are summarised in the SSP Study and supporting document, *Revitalising Blackwattle Bay: Community and Stakeholder Engagement - Outcomes Report*.

This Submissions Summary Report summarises submissions made to DPIE as part of the formal exhibition of the proposal. It addresses all submissions made to DPIE at time of writing, including late submissions received outside of the formal exhibition period.

Submissions Received

A total of 2409 submissions were received including:

- 855 individual submissions from the community;
- 13 submissions from community groups;
- 83 proforma submissions from the Bays Water Club Collective and the owners of 120 Saunders Street, Pyrmont;
- 1430 proforma submissions via the website of Jamie Parker MP, Member for Balmain.
- 11 submissions from NSW Government agencies;
- A submission from City of Sydney Council;
- A submission from Inner West Council;
- A submission from Jamie Parker MP, Member for Balmain;
- Submissions from the three private landowners within the precinct; and
- 11 submissions from non-government organisations and industry bodies.

Proforma Submissions

In analysing the submissions received via the Planning Portal and direct email, submissions were identified which contained the same or substantially the same text and were therefore counted as proformas.

1430 proforma submissions were received via the website of Jamie Parker MP, Member for Balmain. A copy of this proforma submission is provided at Attachment A. Mr Parker made a separate submission also raising these issues.

The form emails stated concerns including:

- That excessive height and residential land use would overwhelm local infrastructure such as schools and parks, overshadowing the foreshore, the rooftop solar panels of the approved Sydney Fish Market and public open spaces;
- That the proposed 5% contribution towards affordable housing is inadequate and does not deliver the extent of housing diversity expected or possible on public land;
- That the study does not address the cumulative impacts of traffic from both the new Sydney Fish Market and the redevelopment of the remaining precinct;
- That the proposed contribution of 30% public open space is insufficient particularly in light of COVID-19 impacts;
- That access to the harbour foreshore will be limited to the general public; and
- That no mechanism for value capture from rezoning of private sites has been established.

Twenty-one owners of apartments at 120 Saunders Street, Pyrmont, submitted a proforma submission (provided at Attachment B) which raised concerns including:

- That the proposal was not in keeping with the local character particularly with respect to the proposed heights which should be limited to a maximum of 18 storeys;
- That the location of proposed open space is not supported and doesn't correspond with consultation discussions held with the building owners;
- That the proposal presents unacceptable visual bulk, overshadowing, overlooking and loss of privacy;
- That the proposal is an overdevelopment in an area already densely populated and the precinct should be developed as open space; and
- That the proposal fails to consider the noise and vibration impact of the construction on 120 Saunders Street.

A further 62 form submissions were received in support of the Bays Water Club Collective. These submissions have been summarised with those of other community interest groups.

Community Submissions

The 855 personal submissions assessed raised a broad range of issues. The top ten issues raised included:

- Bulk and Density – 59% of submissions
- Height – 58% of submissions
- Solar Access to the Public Domain – 38% of submissions
- Amount of Open Space – 36% of submissions
- Traffic and Roads – 29% of submissions
- Infrastructure Contributions – 28% of submissions
- Potential Benefit from Public Land – 27% of submissions
- Foreshore and Promenade – 25% of submissions

- Social and Affordable Housing – 22% of submissions
- Place Character – 21% of submissions

The issues raised in personal submissions have been categorised into the following themes and are discussed below to build a clear understanding of the nature of submissions received from the community.

- Built Form;
- Environment;
- Planning and process;
- Movement; and
- Place.

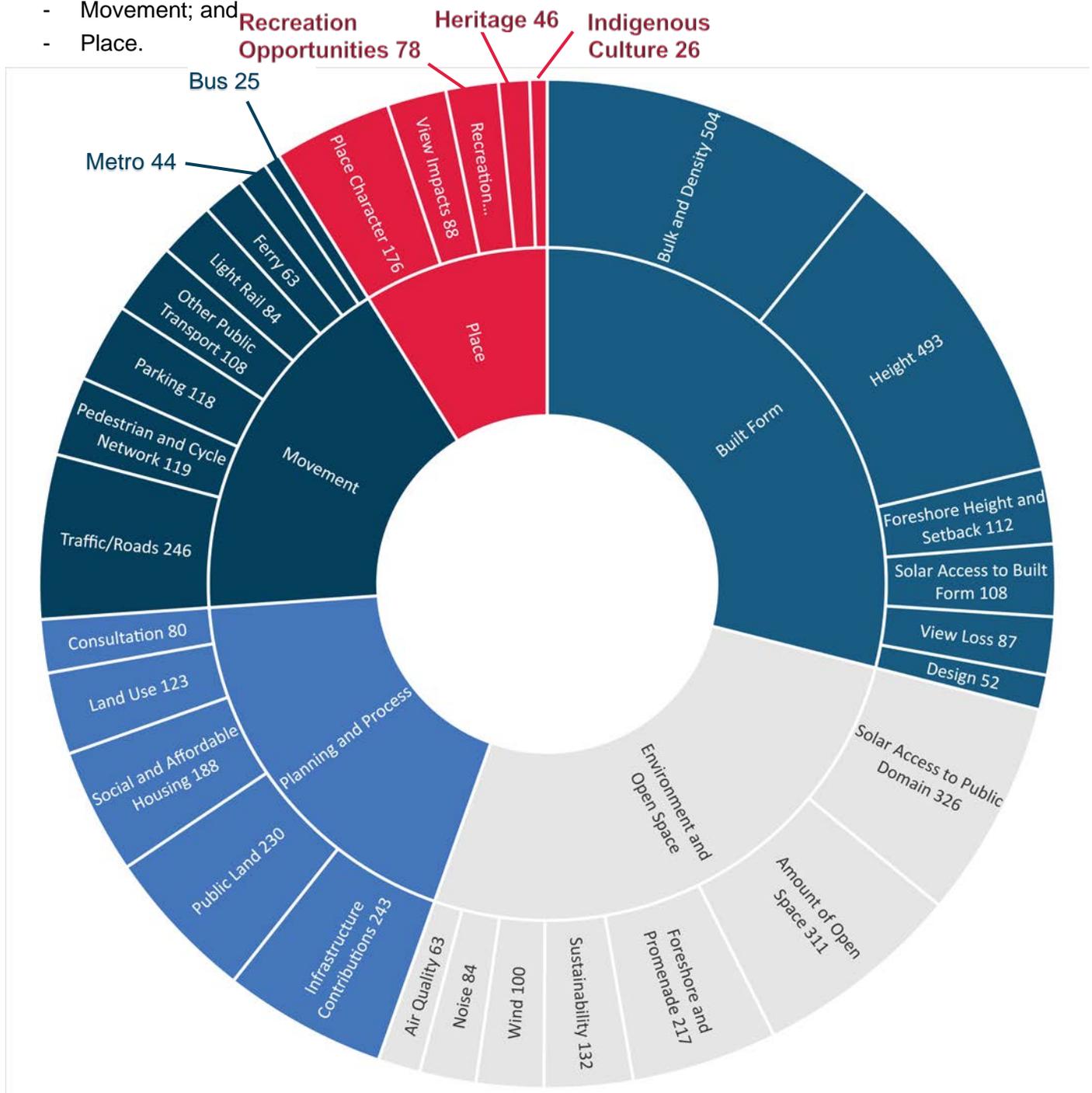


Chart 1: Number of Submission comments by theme

Built Form

The majority of submissions raised concerns regarding the proposed built form relating to:

- Building Height – 58% of all submissions objected to the heights of the proposed buildings.
- Bulk and Density – submissions raised concerns regarding the proposed bulk (17%) and density (42%) of the proposal. This included a broad range of impacts such as:
 - o Visual impact of unarticulated building bulk from the waterfront and Pyrmont;
 - o Local impact and sustainability of population size; and
 - o Excessive building footprints.
- Solar Access – 13% of submissions objected to lack of sun access to private property, especially nearby apartments.
- Foreshore Height and Setback – 13% of submissions objected to the impact of tall buildings directly adjacent to the waterfront and noted that building heights should step down to the foreshore.
- View loss – 10% of submissions raised concerns regarding view loss from neighbouring buildings.
- Design – 9% of submissions raised concerns regarding the proposed design excellence strategy not following the existing process and concerns regarding the aesthetic element of the proposal.

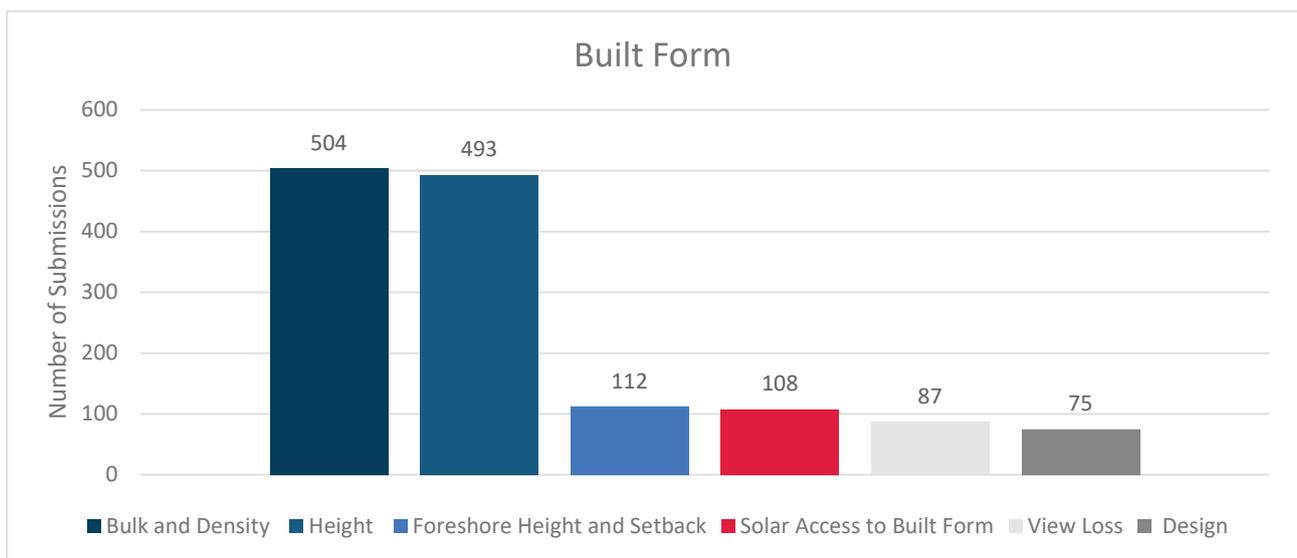


Chart 2: Number of submissions commenting on Built Form

A majority of submissions raised concerns regarding tower heights being too high (493 submissions). This issue was usually raised in conjunction with general overshadowing and other amenity impacts on the public domain. For example, height was combined with overshadowing of public domain in 219 submissions and wind impacts in 59 submissions.

Built form and master planning comments also commonly raised concerns regarding bulk and density (504 submissions). Bulk was generally raised in relation to the visual impact of bulk from the waterfront and from the Pyrmont peninsula. Setbacks and height in the vicinity of the foreshore promenade was specifically raised in 112 submissions. Comments around density largely focussed on the quantum of residential development and/or the impacts of the resultant population in an area already characterised by high population density.

A large number of individual personal submissions (in addition to the 1430 form emails generated via the Jamie Parker website) raised concerns about potential flexibility in the planning framework allowing further increased bulk and density in future.

Solar access was raised in the context of both built form and public space. In terms of solar access to built form, 108 comments were made in submissions with a number of comments from local residents of Pyrmont noting personal concerns regarding loss of sun access to their dwellings.

View loss from neighbouring residential buildings was mentioned in 87 individual submissions and was commented on in the form submissions from owners at 120 Saunders Street.

A small number of submissions raised design as an issue and submissions raised design excellence or design competitions and the design aesthetic of the proposed built form 75 times.

Environment

Environment and open space issues were the second most frequently occurring theme within submissions with comments relating to:

- Solar access to the public domain – 38% of submissions raised concerns regarding overshadowing of open space and public domain within and around the precinct including Wentworth Park and the Glebe foreshore.
- Amount of open space – 36% of submissions requested additional open space.
- Foreshore and promenade – 25% of submissions commented on the importance of the qualities of the foreshore as an open space for passive recreation and the need for the promenade to provide for active transport.
- Wind – 15% of submissions objected to the wind impacts of tall buildings particularly on the amenity of the public domain.
- Sustainability measures – 12% of submissions raised concerns regarding lack of sustainability measures in the precinct and proposed planning controls including 11% making specific comments regarding overshadowing of the solar panels on the approved new Sydney Fish Market.
- Noise and air quality – submissions raised concerns regarding impacts from noise (10% of submissions) and air quality (7% of submissions) particularly in the context of proximity to the Western Distributor on ramp.

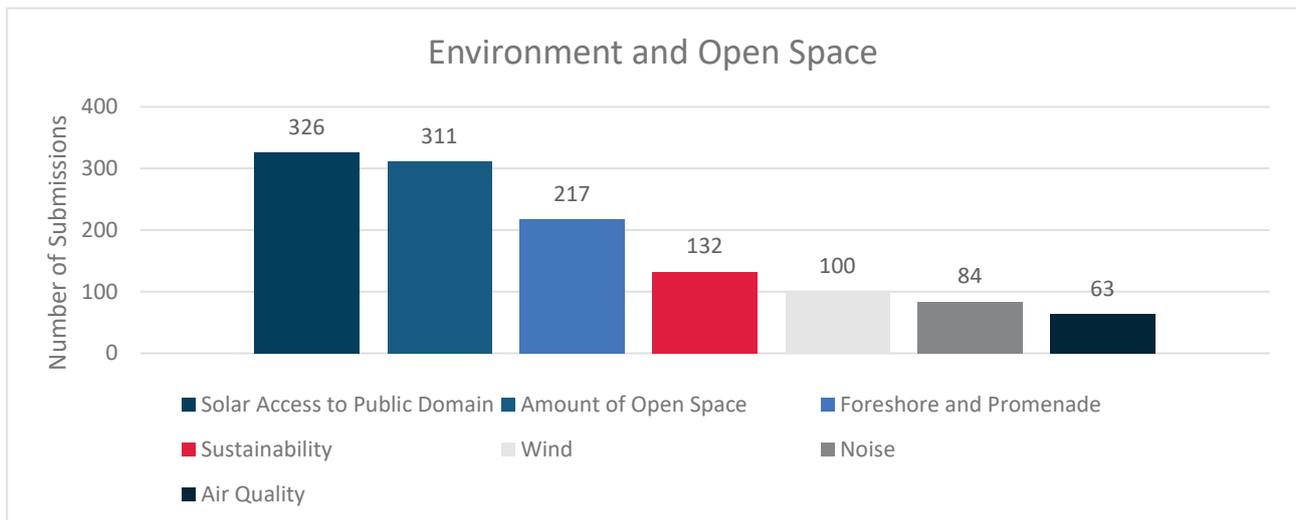


Chart 3: Number of submissions commenting on Environment and Open Space

The majority of comments in this category related to concerns around limited solar access to the public domain caused by the height and bulk of the proposed built form. Impact of overshadowing including to proposed parks was raised in 326, more than 38% of submissions. This issue was closely related to the issue of heights summarised under built form as was wind which was raised in 15% (100) submissions.

Closely following this, the amount of land allocated for public open space with quantum of open space referenced in 311 submissions. These statements often noted the greater proportional allocation of land in the precinct for development compared to open space and asked for an increase in open space.

Public submissions raised the foreshore and foreshore promenade as a separate issue in 217 submissions. These submissions often stated that the 10 metre foreshore setback was considered to be inadequate, some raising further concerns regarding the 3 metre width proposed for cycling and active recreation and the potential for commercial interfaces to impact on the recreational benefit and amenity of the promenade. Other submissions referred to preferred widths of 20-30 metres.

Sustainability generally was reflected in 132 submissions as a notable absence from the SSP proposal. This included references to water quality impacts due to extensive development, minimal inclusion of sustainability measures into the proposed masterplan. Overshadowing of the rooftop solar panels of the approved new Sydney Fish Market as a result of proposed tower heights was specifically raised 96 times.

Further concerns were raised regarding air quality (63 submissions) and noise impacts (84 submissions) due particularly to the proximity of the Western Distributor on ramp. These issues were focussed on whether the proposed residential dwellings would achieve appropriate amenity standards.

Planning and Process

Submissions on the *Planning and Process* theme raised concerns regarding strategic planning alignment and planning process matters. Comments raised concerns relating to:

- Infrastructure Contributions – 28% of submissions noted the need for infrastructure planning including both State infrastructure such as schools and local infrastructure such as community centres and parks.
- Public Land – 27% of submissions objected to the development of public land querying the level of public benefit delivered.
- Social and Affordable Housing – 22% of submissions stated that the proposed 5% affordable housing provision should be increased or noted general concerns regarding the lack of social and affordable housing.
- Land Use Mix – 14% of submissions raised concerns regarding the amount of residential and/or commercial floor space and the compatibility of the proposed uses for the site.
- Consultation – 9% of submissions raised concerns regarding the lack of incorporation of previous community feedback into the proposed masterplan and draft planning controls.

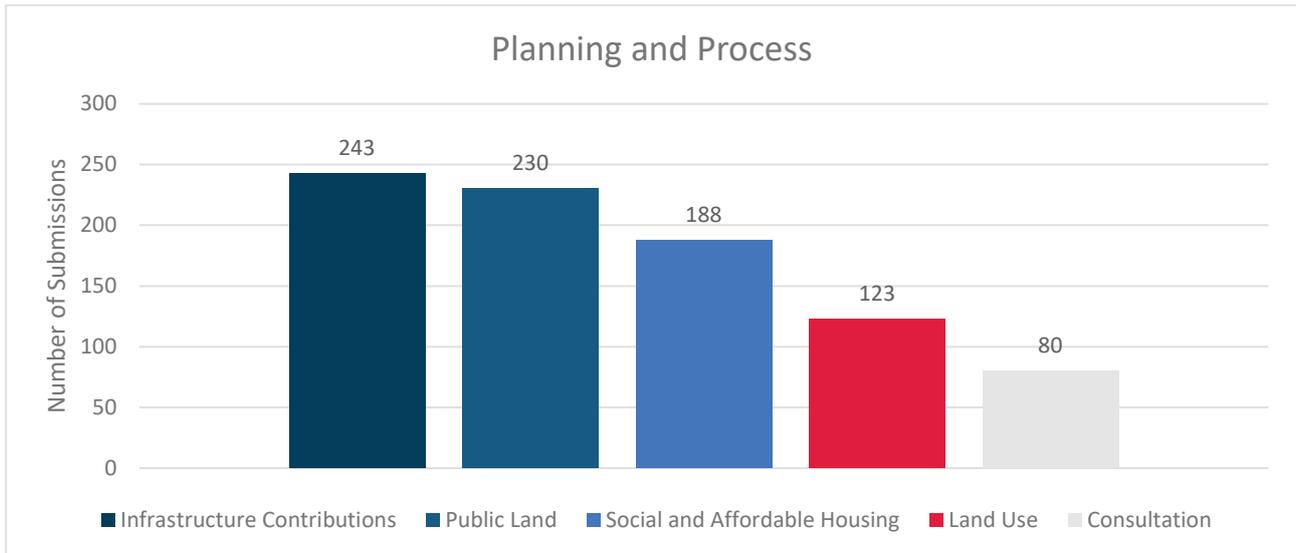


Chart 4: Number of submissions commenting on Planning and Process Issues

A number of submissions noted that the density proposed would need to be supported with an adequate infrastructure plan. Comments relating to the types of infrastructure required to support the precinct often referred to the need for community facilities generically. Such comments or those specifically referring to libraries or community centres or other Council-operated facilities were categorised as comments relating to local infrastructure contributions and appeared in 11% of submissions. Comments on State and regional infrastructure contributions appeared in 18% of submissions often referencing the need for provision of a school on the site.

Comments on process included references to ensuring that the Pymont Peninsula Place Strategy be allowed to be completed to ensure that infrastructure provision and land use was considered holistically. Some of these comments noted that the proposed masterplan exceeded the expected population established by the Pymont Peninsula Place Strategy for the Blackwattle Bay sub-precinct. The amount of either commercial or residential development being too great was referenced in 14% of all submissions. In 2% of submissions these comments noted that the proposed uses were considered to be incompatible with the site.

Some 27% of submissions noted the expectation that public land deliver greater public benefits. Further to this 22% of submissions raised concerns regarding the lack of social and affordable housing, many asserting that the proposed provision of 5% of residential GFA for affordable housing is inadequate.

A total of 9% of submissions raised concerns regarding the consultation process noting that feedback previously given by the community did not appear to have been incorporated into the proposal. There were also concerns raised regarding the proposed planning framework including provisions for exempt development allowing a wide range of development without consent and minimising community input. It is noted that there appears to be some confusion regarding the effect of the provisions proposed, for example, comments appeared to confuse the operation of the 'public authority precinct' clause under the Infrastructure SEPP with the continued operation of the State and Regional Development SEPP incorrectly stating that the 'public authority precinct' would make the proposed development exempt from development consent processes.

Movement

Submissions categorised under the *Movement* theme raised concerns regarding the proposed road, public and active transport networks with a total of 523 comments relating to:

- Traffic and Roads – 29% of submissions raised concerns regarding the impact of additional development on existing traffic congestion.

- Public Transport – 12.6% of submissions noted concerns regarding public transport generally, 3% raising specific comments on ferry services and 5% raising comments specific to the future Metro.
- Pedestrian and Cycle Network – 14% of submissions noted the need for improvements to pedestrian and/or cycle networks.
- Parking – 14% of submissions commented on parking provisions noting especially impacts on the availability of on-street parking resulting from the new development and the ongoing Sydney Fish Market visitors.
- Light Rail and Bus – submissions raised concerns regarding existing light rail (10% of submissions) and bus services (3% of submissions) especially noting inadequate, crowded services.

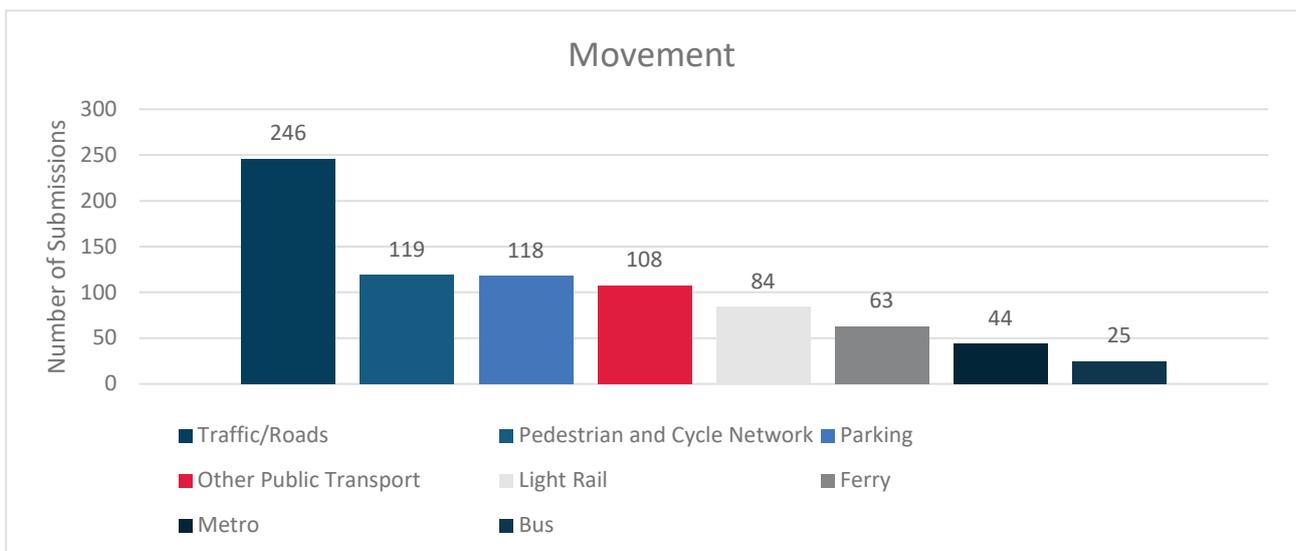


Chart 5: Number of submissions commenting on Movement Issues

The movement network in the vicinity of Blackwattle Bay is currently highly constrained with heavy vehicle traffic, bus and light rail services at capacity at both AM and PM peak times; a theme reflected in 17% of total submission comments.

Traffic and roads were referenced in 246 or 29% of total submissions. Comments generally raised concern around the existing level of vehicle traffic particularly at peak hour many referencing traffic carried on the Western Distributor. Further comments reflected concerns around peak travel times for the Sydney Fish Market. Safe travel to schools during the morning peak was also raised.

Fourteen percent (119) public submissions noted the potential to improve walkability and cycle networks in the precinct and surrounds. This included requirement to increase the foreshore setback provision to allow greater than 10 metres and to provide an active transport connection via the Glebe Island Bridge.

Fourteen percent (118) public submissions raised concerns regarding the impact on parking in surrounding streets. These submissions noted that residential uses would be expected to include parking with resulting impacts of car use flowing onto neighbouring on-street parking and the impact of Sydney Fish Market visitors on on-street parking, especially during public holidays.

Within the category of movement, 324 submissions referred to existing and future public transport modes. Light rail was mentioned in 10% of submissions, bus in 3%, metro in 5% and ferry in 3% with the remaining submissions raising public transport generally. These submissions noted that the coming Metro station at Pymont would improve the existing constrained movement network especially overcrowded bus and light rail services. Many of these submissions also noted that the

Metro would not solve transport issues due to the distance of the future metro station from the precinct.

Place

The majority of submissions raised concerns regarding the impact of the proposal on the unique place qualities and character of Pyrmont and neighbouring areas. Of the submissions relating to this theme comments raised concerns relating to:

- Place Character – 21% of submissions objected to the form of development not respecting the character of Pyrmont and the Bays area.
- View Impacts – 10% of submissions objected to the impact of tall buildings on the city skyline and on views of Blackwattle Bay.
- Recreation Opportunities – 9% of submissions raised concerns regarding the need for recreation spaces and opportunities for active recreation for the increased population.
- Heritage – 5% of submissions raised concerns regarding the impact of the proposed renewal on the heritage built form of Pyrmont and the industrial heritage of the Bays.
- Indigenous Culture – 3% of submissions raised concerns regarding meaningful incorporation of indigenous culture into the renewal project.

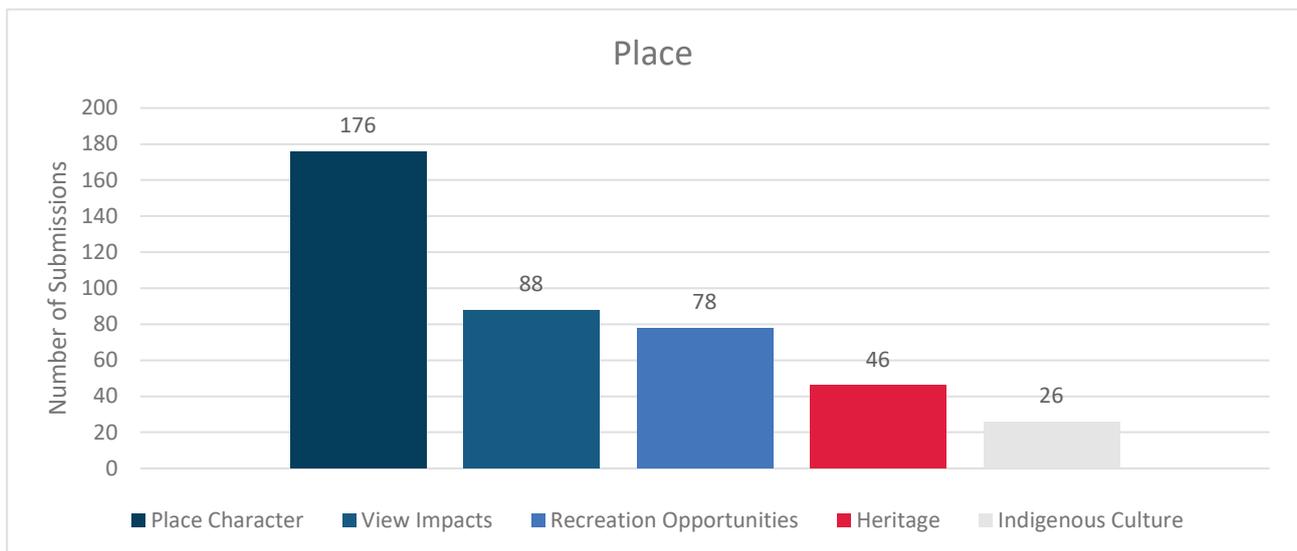


Chart 6: Number of submissions commenting on Place Issues

Public submissions accept the redevelopment of Blackwattle Bay and renewal of Sydney Fish Market which will transform the character of Blackwattle Bay. Some comments from submissions identify key elements that contribute to the character of the precinct which the community values and seeks to retain. Place character generally was the subject of 176 submissions with specific references to retaining the character of Pyrmont were included in 70 of these.

The visual impact of the proposed towers especially from the Glebe foreshore was commented on in 88 submissions. These submissions noted that the proposed built form would alter the skyline considerably and impact on the open character of the bay with the Council of Ultimo-Pyrmont Associations commenting that over-tall towers will form a wall between Pyrmont/Ultimo and the harbour and between Pyrmont and Glebe.

Forty-six submissions include comments noting that this transformation should recognise existing heritage elements into the proposed plans through the development of more sympathetic designs. In particular, respect for the landmark character of Anzac Bridge, restoration of the Glebe Island Bridge and incorporating features of the Pyrmont built form are encouraged. Reflection of place

character was mentioned in 176 submissions. Submissions included 26 comments noting the opportunity to incorporate aboriginal cultural input into the design and features of the precinct.

Community Groups, Landowners and Other Stakeholders

Submissions were received from the following community groups and key stakeholders:

Community representative group	Comment
Pyrmont Action Inc	<p>Makes a range of recommendations including:</p> <ul style="list-style-type: none"> - A need for genuine consultation with the community and City of Sydney; - The proposal should reflect the provisions of SREP 26 to protect and enhance views and the scenic quality of foreshores and waterways; - The proposed masterplan should reduce built area, increase green public open space and increase the foreshore promenade to 30m wide; - The proposed masterplan should reduce building heights to reflect the existing built form as expressed through consultation to reduce wind impacts, particularly close to the waterfront; - The proposal should consider future market demand for housing and commercial space noting that redevelopment of the precinct should not be required to cover the cost of the new SFM; - The future development approval process for Public Open Space should involve community consultation and should not be exempt development but should be assessed by the City of Sydney as the consent authority for projects under \$10m and the Planning Minister for those over \$10m; - The proposal should ensure appropriate provisions for local infrastructure contributions and direct funding to provision of centrally located regional community infrastructure eg the Maybanke Sports and Recreation Centre (PPPS p75), improved lighting and signage; - The proposal should nominate requisite infrastructure including safety features, improvements to the pedestrian and cycle network, parking facilities including multi-use hubs proposed by the PPPS, and should undertake further investigation of the need for a school; - The proposal should reconsider the mix of uses and include a greater commitment to affordable housing, provision of childcare, cultural facilities and maker spaces; - The proposal should incorporate sustainability measures; and - The proposal should support and incorporate First Nations heritage.
Council of Ultimo/Pyrmont Associations	<p>Recommends that the proposal be revised including:</p> <ul style="list-style-type: none"> - The proposal should incorporate indigenous history, heritage and culture; - The rezoning process should allow the Place Strategy to be finalised prior to planning for Blackwattle Bay; - Excessive height and bulk of proposed built form should be reconsidered noting view loss and view impacts, noise and air quality impacts, overshadowing and wind in public domain and public open space, population density and traffic; - The proposal should include an infrastructure plan noting the need for more community facilities, width of the foreshore promenade, commitment to public and affordable housing, open space and sport facilities; and

Community representative group	Comment
	<ul style="list-style-type: none"> - Future planning and development approval processes should involve the local community.
Kent Street Residents Group	<p>Raises a range of concerns regarding the proposal including:</p> <ul style="list-style-type: none"> - Privatisation of the foreshore should be prevented; - There should be no exemption from development approval through 'normal planning processes'; - The height, density and proximity of development to the foreshore should be reduced; - Amenity impacts on current and future residents due to density, additional traffic, noise, air quality, wind and sun access will be unacceptable; - There is a need for connected Glebe Island Bridge and a 20-30 metre wide foreshore promenade to accommodate walking and cycling; - The proposal will result in unacceptable view loss; - The proposed amount and quality of green open space is inadequate; - That the proposed amount of affordable and social housing is inadequate; and - That development must be supported by an infrastructure plan.
Millers Point Community Residents Action Group	<p>The submission raises a range of concerns regarding the proposal including:</p> <ul style="list-style-type: none"> - That the proposed heights should be reduced to 16-25 storeys; - That the proposal should include the reuse of Glebe Island Bridge as a pedestrian walkway and cycleway; - That an infrastructure delivery plan should be included in the proposal and should be developed in collaboration with the City of Sydney. <p>The submission objects to the following aspects of the proposed masterplan and draft planning controls:</p> <ul style="list-style-type: none"> - The proposed foreshore promenade width of 10 metres is considered to be inadequate and the wind and overshadowing impacts of the proposed adjacent built form are considered to be detrimental to the quality and amenity of the foreshore; - The proposed provision of only 5% affordable housing is considered inadequate; - to the proposed 'public authority precinct' provision is not supported instead the City of Sydney is recommended as the authority for planning the foreshore park; - The proposed provisions making development over the value of \$10m SSD are not supported; and - The high amount of residential development proposed is not supported noting that this exceeds the figure proposed by the Pymont Peninsula Place Strategy and that as one of the few areas allowing extension of the Harbour CBD the site should have a focus on non-residential development.
Bays Community Coalition	<p>The submission objects to the following aspects of the SSP Study, proposed masterplan and draft planning controls:</p>

Community representative group	Comment
	<ul style="list-style-type: none"> - The proposed height and setback is inappropriate and should not be justified by the height of the Anzac Bridge; - The proposal should comply with the ADG requirements and residential development should provide adequate natural ventilation; - The proposal should include a commitment of at least 15% social and affordable housing; - Assessment of the need for childcare and community facilities for children is lacking and should include workers from the Sydney Fish Market; and - The Health Impact Assessment is insufficient and should include assessment of air quality and other health impacts on the residents to the east of the precinct and assessment of marine sediment contamination.
Glebe Society	<p>The submission objects to the following aspects of the proposed masterplan and draft planning controls and raises a range of concerns including:</p> <ul style="list-style-type: none"> - The proposed foreshore promenade is considered to be inadequate, should be 30m wide and ensure that wind and overshadowing do not impact the amenity of the foreshore; - The proposed shared pedestrian and cycle paths will not work; - The proposal does not include sufficient access for recreational water users; - The proposal will impact on the residents of Glebe through overshadowing and view impacts and through the changed character of the Bay; - The proposals response to the character of Pyrmont is insufficient and does not address the impact of the Western Distributor; and - The proposal fails to respond to feedback provided during non-statutory consultation; - Building heights should be reduced significantly, in line with neighbouring height controls; - Apartments should all have solar access and be protected from noise and air pollution; and - Buildings should also conform to sustainable building standards.
Coalition of Glebe Groups	<p>Raises a range of concerns about the proposal including:</p> <ul style="list-style-type: none"> - That the proposed height and density are excessive and resultant overshadowing including to the fish market; - That the proposal should address cyclist and pedestrian safety and comfort; - That the proposed commitment to social and affordable housing should be increased; - That the proposal generates unacceptable wind tunnels between tall buildings; - That the implications of post-COVID development planning on the mix of residential and commercial space have not been considered adequately; - That there is a need for greater allocation of land for open space; and

Community representative group	Comment
	<ul style="list-style-type: none"> - That the proposal should include facilities for passive water users.
Ultimo Public School P&C Association	<p>The submission notes that:</p> <ul style="list-style-type: none"> - Additional residential development will increase the demand for school places and this is the only remaining site that can accommodate a future school to manage this demand; and - A future school on the Blackwattle Bay site would activate the precinct and attract talent. <p>The submission recommends that the proposal should establish a new middle school (years 7-10) for Ultimo-Pyrmont on the Blackwattle Bay SSP as Sydney Secondary College (Blackwattle Bay) takes year 11-12 students only.</p>
Sydney Secondary College Blackwattle Bay P&C Association	<p>The submission notes that the Sydney Secondary College Blackwattle Bay campus is currently operating beyond its design capacity with students accommodated in temporary structures and recommends that likely pressure on local schools is reviewed and all necessary expansion of capacity is completed prior to occupation of the new dwellings.</p> <p>The submission notes that any increase in traffic generated by the proposal would increase hazards for students travelling to school and recommends:</p> <ul style="list-style-type: none"> - Signalised crossing at Bridge Road and Wentworth Road, - Signalised crossing augmented to include the western side of Wattle Street, Darling Street and Bridge Road, and - Traffic minimisation and/or calming measures be investigated for Taylor Street. <p>The submission requests that mitigation measures to manage construction noise and nuisance and ongoing noise and amenity impact from the future development.</p> <p>The submission notes that there may be a future need to secure the school site which currently has an unenclosed frontage on the Blackwattle Bay foreshore edge from direct access from the proposed park.</p> <p>The submission objects to the bulk and scale of the development in close proximity to the school and the amenity impacts including on views and recommends that these are best addressed by reducing the bulk and scale of the proposal.</p>

Submissions were received from the following water user groups.

Water User Group	Comment
Bays Water Clubs Collective	Form submission lodged by 62 individuals. The submission seeks consideration of community views including for the precinct plan to support and grow community infrastructure, to safely manage the growth in maritime traffic, to protect and expand access to public open blue space, to rehabilitate the natural harbour environment and to elevate the ancient history of The Bays.

Water User Group	Comment
Pacific Dragons Dragon Boat and Outrigger Canoe Club	<p>The submission seeks provision for parking, especially with regard to accessing the Bank Street Open Space including secure bicycle, scooter and motorcycle parking and loading/unloading areas to allow for large and long vehicles to access the storage area for Dragon Boats.</p> <p>The submission seeks provisions of lighting and security to the area for users who use the area outside of daylight hours noting that paddling, Dragon Boating or other, is predominately outside of daylight hours in winter.</p> <p>The submission seeks provisions for the relocation of the 15 DBNSW clubs during construction.</p>
Dragon Boats NSW Inc	<p>Supported by submissions from Blue Fins Dragon Boat and Outrigger Canoe Club, Sydney Tsunami Dragon Boat Club, Mavericks Dragon Boat Club, Sloths Dragon Boat Club and ACCA Dragon Boat Racing Team.</p> <p>Submission recommends that:</p> <ul style="list-style-type: none"> - Parking needs should be reassessed to provide vehicle access to the Bank Street Open Space to transfer boats to and from the site; - Adequate lighting and other security measures should be provided to Bank Street Open Space to provide security for recreational users outside of daylight hours; - The study should explicitly address the presence and storage of outrigger canoes (6) on the Bank street site and the future of Outrigger Canoeing at the Bank Street site including the relocation of the 15 Dragon Boat NSW clubs during construction; and - Storage space and a clubhouse should be provided at 1-3 Bank Street including changerooms, toilets and showers and administration space for sporting clubs.
Tribal Warrior Aboriginal Corporation and Blackwattle Bay Marina	<p>Recommends boat facilities at Bank Street open space to accommodate existing and future boat use including a boat ramp and boat parking area.</p>
Pymont Heritage Boat Club	<p>Notes opposition to over development including high rise towers and excess traffic access. Supports development of green open spaces and foreshore regeneration and facilities for community engagement with country and access to the Blackwattle Bay waterways and Sydney harbour.</p>

Submissions were received from the three private landowners within the precinct.

Landowner within the precinct	Comment
Poulos	<p>The submission raises the following concerns:</p> <ul style="list-style-type: none"> - The Poulos site provides more employment uses as a percentage of the total gross floor area compared to the Government owned land. However, the Government owned land has a greater ability to accommodate large footprint buildings required for commercial land uses; - The building heights and FSR allocated to the sites are inequitable and inconsistent with the starting design principles established early in the process. There is no adequate justification for the reduction in height for the Poulos site.

Landowner within the precinct	Comment
	<ul style="list-style-type: none"> - The prescriptive controls including the provision for total maximum GFAs for each land use are not supported. - The land use mix proposes a high proportion of non-residential FSR however floorspace demand modelling has not considered planned growth or future demand in competitive fringe locations, particularly the broader Pymont Peninsula, the Sydney CBD, the Central SSP, Central to Eveleigh and nor has it quantified the COVID-19 demand implications. - The SSP Study Requirements did not request the feasibility of future development, only testing ability to contribute towards local, state and regional infrastructure. - The Poulos Site is identified to accommodate 11,680sqm of commercial floorspace, which accounts for 12% of the total floor area proposed commercial floorspace for Blackwattle Bay SSP. This is significantly greater than the other private landowners. <p>The submission provided an alternative design option for the site, including assessment on acoustic impacts and air quality. The submission seeks the following amendments to the SSP:</p> <ul style="list-style-type: none"> - Reduce the quantum of non-commercial floor space to refocus the Government site for the main delivery of commercial space. - Delete specific maximum GFA requirements. - Reconsider building height to allow buildings up RL90 (30 storeys) akin to the Jacksons Landing RLs and more balanced with the Government lands. - Delete specific built form provisions as they relate to the shape and form of the buildings.
Hymix	<p>The submission supports the overall vision for Blackwattle Bay Precinct however raises the following concerns:</p> <ul style="list-style-type: none"> - Concrete batching plants are required to operate in a flexible manner, responding to the needs of construction design requirements, project delivery programs and within close proximity to the areas of demand. The Hymix Pymont concrete batching plant is a critical part of the Hanson / Hymix concrete supply network. - Blackwattle Bay State Significant Precinct Study appears to have been developed on the basis that the Hymix Pymont concrete batching plant will either close or relocate. However, the landowners do not plan on closing or relocating the facility to another site. - No changes are being proposed to the nature or intensity of the existing facility. - No sound justification provided for Infrastructure NSW to allocate significantly higher height and floor space to the former fish markets site and to treat the Hymix site differently in relation to bulk and scale of the built form. The Hymix site is less constrained by the solar height plane in terms of overshadowing Wentworth Park and the Glebe foreshore. - The Blackwattle Bay State Significant Precinct rezoning proposal proposes to rezone the Hymix site to B4 Mixed Use, where the Hymix concrete batching plant would become a prohibited use. - It is imperative that the proposed redevelopment of the Hymix site into an integrated facility is viable.

Landowner within the precinct	Comment
	<ul style="list-style-type: none"> - The Hymix site could accommodate approximately 39,360m² at a Floor Space Ratio of approximately 4.33:1. - The Blackwattle Bay State Significant Precinct rezoning proposal proposes a minimum floor space provision for the Hymix site of approximately 54%, which is significantly higher than the average provision for the rest of the precinct of approximately 47.5%. <p>The submission makes the following recommendations:</p> <ul style="list-style-type: none"> - Amend the Blackwattle Bay State Significant Precinct to accommodate the existing batching plant in its current form, including in relation to management of heavy vehicle traffic and associated amenity issues, or to establish alternative arrangements that facilitate the redevelopment of the facility in a way that enables coexistence through minimising land use conflict and amenity issues. - Undertake the necessary environmental impact assessments that demonstrate that the amenity outcomes being sought can be achieved with the ongoing concrete batching plant operations or be required to identify off-site mitigation measures that ensure that appropriate amenity outcomes can be achieved. <p>Future vision for the redevelopment of the site with retention of the concrete batching plan:</p> <ul style="list-style-type: none"> - A minor boundary adjustment that will enable Hanson to consolidate and compress the Hymix concrete batching plant activities, whilst also facilitating an east-west link between the Blackwattle Bay waterfront and Miller Street. - A built form that enables Hanson to relocate the concrete batching plant within a building podium, facilitating the delivery of the waterfront promenade through the Hymix site, as well as new public domain activated by commercial/retail uses also within the podium. - Two residential towers located above the podium maximising developable floor space. - All operational activities including batching and loading would be entirely contained within a solid building structure, providing effective removal of operational dust and noise emissions. <p>Trucks would continue to enter and exit via Bank Street. These trucks will continue on Bank Street irrespective of whether the Hymix facility is redeveloped or not. Importantly, any new residential land use above or immediately adjacent to the redeveloped integrated facility would be located above the deck of the ANZAC Bridge, meaning that any noise impacts arising from heavy vehicles will need to be addressed through design and mitigation irrespective of the trucks on Bank Street.</p>
Celestino	<p>The submission supports majority of the SSP Study however raises concerns over the planning controls applying to the Celestino site noting that the proposed controls do not support a high quality, financially viable outcome for the site. The submission makes the following recommendations:</p> <ul style="list-style-type: none"> - A maximum building height of RL121.1 be applied to site. - A maximum 26,000 sqm GFA be identified for the site. - A minimum 3,000 sqm non-residential GFA be identified for the site. - The Design Code should foster greater flexibility on the strict application of site-specific built form controls (such as building setbacks and separation distances) to encourage place-led and performance-based outcomes.

Landowner within the precinct	Comment
	<ul style="list-style-type: none"> - Allow density and building height incentives for development that has undergone a competitive design alternative process and achieves design excellence and which provides public benefit of exceptional value. - Clear and transparent mechanism for identifying the public benefits to which developers must contribute in order to provide clarity and certainty to investment decisions.

Non-government organisations and industry bodies

Submissions were received from a range of expert and special interest groups.

Expert/Interest Group	Comment
The Antipoverty Centre	<p>The submission recommends:</p> <ul style="list-style-type: none"> - Planning for new residential floorspace at Blackwattle Bay should start from a position that 100% of housing constructed on public land should be publicly owned social housing, and incorporate a minimum of 775 public housing dwellings. - Planning for Area 3 should be reconsidered to provide a greater emphasis on residential floor space (public housing), while still retaining some proposed workplace and retail uses. - At least 10% of the new social housing should be reserved in the first instance for Aboriginal and Torres Strait Islander people on the waiting list and be managed by Aboriginal-controlled organisations, in line with calls from the Redfern Waterloo Alliance of Aboriginal Community Controlled Organisations. - All new dwellings, including private and social housing, should comply with Liveable Housing Design Guidelines (LHDG) gold standard.
The Australian Institute of Architects	<p>The submission recommends:</p> <ul style="list-style-type: none"> - That the proposed master plan be developed and delivered as a partnership between state and local government with detailed decision-making being devolved to the City of Sydney; - That planning approval powers be vested with the City of Sydney and follow the City's design excellence process; - That the subdivision pattern and development project parcelling should be revised to support a diversity of project briefs and design through a larger number of smaller development projects; - That a contributions framework be in place prior to rezoning and make generous provision for floor space to be set aside for health, education and cultural uses and provide for 20% affordable housing; and - That the noise and air quality impacts of Anzac Bridge be addressed through careful siting of residential uses.

Expert/Interest Group	Comment
Business Sydney	<p>The submission supports the proposed development and an integrated land use model for the SSP Study area that enable the retention and continuation of existing working harbour uses that occur in the area to coexist with the new surrounding land uses. The submission also provided the following comments:</p> <ul style="list-style-type: none"> - It is considered necessary to ensure the current Sydney Fish Market operations be fully maintained in perpetuity; - Consideration must be given for the Sydney Fish Market to expand in the future; - Consideration to facilitate adequate parking and access for private transport and active transport facilities, including cycleways and footpaths, as well as suitable public transport including ferry services need to be undertaken.
City West Housing	<p>The submission recommends:</p> <ul style="list-style-type: none"> - That the proposal should achieve a target of 10% of all residential gross floor area for Affordable Housing; - That a cash contribution equivalent to the fair market apartment value for the suburb is levied on all residential development in the study with the contribution provided to City West Housing; - That a land lot is identified and dedicated to City West Housing for development into fit-for-purpose Affordable Housing; and That SREP 26 continue to apply in favour of a new provision in the Sydney LEP 2012 until a clear monetary contribution rate has been determined and a process for in-kind development is development with feedback from community housing providers experienced in delivering affordable rental apartments.
EcoTransit	<p>The submission recommends:</p> <ul style="list-style-type: none"> - That the scale of the proposed towers and narrow foreshore promenade be reconsidered to improve the attractiveness of the foreshore for pedestrian and active transport use including careful programming of the foreshore promenade to manage commercial intrusion; - That the City of Sydney planning controls continue to apply and that provisions, such as the proposed Infrastructure SEPP amendment allowing exempt development of public works, not be supported; - That Glebe Island Bridge be reopened for active transport; - That the Inner West Light Rail be improved to service more of the Pyrmont Peninsula and the wider Bays area including extension of the existing lines at Pyrmont and White Bay and increasing frequency of services; and That pedestrian tunnels be constructed under Bank Street and Bridge Road, with potential connections to the Pyrmont Metro station, to improve pedestrian safety and comfort.

Expert/Interest Group	Comment
The Property Council	<p>The submission supports the proposal generally and strongly supports the nomination of Blackwattle Bay as a state significant precinct with the Minister for Planning as consent authority for all development valued over \$10 million in CIV. Further to this the submission recommends:</p> <ul style="list-style-type: none"> - That detailed design controls be deferred until development partners are engaged and that Government should also undertake market sounding in the process of developing the design controls to ensure these reflect current market conditions; - That the dwelling target of 1,550 be increased to reflect the substantial public infrastructure investment and benefits provided to this precinct; and - That a high level infrastructure contributions scheme be developed to provide clarity around future infrastructure costs.
Shelter NSW	<p>The submission recommends:</p> <ul style="list-style-type: none"> - That a definition of affordable housing (including public and community housing) be included as essential infrastructure; - That the SSP Study should include an affordable housing dedication closer to 25%; - That the consent authority should support a joint venture arrangement that includes affordable housing; - That the consent authority should consider an affordable housing contribution based on the dedication of land within the Blackwattle Bay area; - That the consent authority should consider dedicating land to affordable housing under a 99-year lease agreement; - That a memorandum of understanding be created to ensure that any financial contribution for affordable rental housing be delivered locally.
Sydney Fish Market	<p>Sydney Fish Market's submission, received on 20 August, supports the proposed redevelopment and emphasised:</p> <ul style="list-style-type: none"> - It is important to ensure any new development approved at Blackwattle Bay does not become a platform for objection to any of the Sydney Fish Market's necessary current or future operations; - That sufficient provisions should be made now for expansion of the Sydney Fish Market in the decades to come.
Urban Taskforce	<p>The submission note support for the proposed redevelopment and recommends:</p> <ul style="list-style-type: none"> - That renewal of Blackwattle Bay be delivered in alignment with acceleration of other 'Bays' renewal projects to allow

Expert/Interest Group	Comment
	<p>development and public domain to activate the Bays in time for commencement of Metro operation;</p> <ul style="list-style-type: none"> - That development feasibility is closely considered and opportunities for a broader precinct with a shared infrastructure contributions scheme across the Bays area is explored; - That amendments to planning instruments should avoid being overly prescriptive and instead focus on building envelopes and an open approach to land use; and - That the entire redevelopment of the Bays area be rezoned via a (State-lead) State Significant Precinct Planning process and that DAs, subject to a certain capital investment value, are also classified as 'State Significant Development' with the Department of Planning and Minister for Planning being the consent authority.
National Trust	<p>Submission notes concerns including:</p> <ul style="list-style-type: none"> - Inadequate assessment of heritage impacts noting need for consideration of items of potential local level heritage significance – the Pyrmont ash handling depot and a historic tunnel; - Misleading visual impact assessments; - The height and envelope of buildings; - Significant overshadowing of Blackwattle Bay and other public areas raising concerns regarding the health of the marine environment; and - Poor place-making and public domain outcomes including development that does not respond to existing character and scale, ineffective width of foreshore promenade zone for recreational cycling, walking and jogging.

Council Submissions

Council	Comment
Inner West Council	<p>The submission supports use of Glebe Island Bridge as an active transport connection.</p> <p>The submission also supports collaborative planning for public infrastructure, noting the potential benefit to future workers and residents of Blackwattle Bay of an indoor recreation facility at White Bay Power Station.</p>
City of Sydney	<p>The City objects to the exhibited SSP Study and EIE and strongly recommends that Infrastructure NSW work with the City to review the precinct plan to ensure the City's Key Issues are addressed.</p> <p>The City further recommends that the rezoning be resubmitted for public consultation after the revised design is complete, and the Department of Planning, Industry and Environment and City have</p>

Council	Comment
	<p>publicly consulted on an infrastructure contributions framework and sub-precinct master planning for the whole of the Pymont Peninsula.</p> <p><u>Strategic Context</u></p> <p>The City objects to the proposal on the basis of failure to respond to the strategic context, including preceding the development of detailed sub-precinct master plans for the Pymont Peninsula Place Strategy and exceeding the expected development population established in the Place Strategy. This is based in part on the Pymont Peninsula Place Strategy expectation that the future population of the Blackwattle Bay sub-precinct (an area more extensive than the SSP) to be 2055 residents while the SSP masterplan proposes a population of approximately 2800 residents.</p> <p><u>Infrastructure</u></p> <p>The City objects to the proposal proceeding on the basis of a satisfactory arrangements clause noting that precinct planning should await the finalisation of an holistic Infrastructure Delivery Plan for the Pymont Peninsula in line with the Place Strategy and the recommendations of the Greater Sydney Commission. The City asserts that should the rezoning proceed on the basis of a satisfactory arrangement clause the following concerns are raised:</p> <ul style="list-style-type: none"> - The proposal fails to give effect to Region and District Plan priorities to align growth with infrastructure, sequence infrastructure provision using a place-based approach and maximise the utility of existing infrastructure assets; and - The proposal fails to deliver the Blackwattle Bay sub-precinct place priority for the project to contribute towards the provision of new community and cultural facilities, including community and library floor space, communal rooms, work-based childcare services, production space for creative arts and medical services. <p>The City supports the following commitments of the proposal noting however that these are not secured in the proposed planning framework:</p> <ul style="list-style-type: none"> - Increased provision of ground level cultural spaces for participation/exhibition as part of private development. - Provision of new production and rehearsal space to support local creative and performing arts. - Provision of affordable creative live/workspaces within residential developments. - Provision of 'cultural production' space of approximately 1,200 square meters – noting that at this stage the City unlikely to own or manage this space but can support a State/Private partnership with research, facilitation and networks and evidence of successful international investment models with arts broker agencies or Creative Lands Trust investment. <p>Public benefit opportunities suggested in the PPPS and supported by the City as they relate to Blackwattle Bay include:</p>

Council	Comment
	<ul style="list-style-type: none"> - Removal of greyhound track and expansion of Wentworth Park as public green open space, to include active recreation and sports field, and - Completion of the foreshore walk. <p>The City objects to the lack of sufficient sunlight to the proposed parks citing that this impacts negatively on the use, plant species selection, longevity and maintenance of planting.</p> <p><u>Parking</u></p> <p>The City suggests that as the precinct is highly accessible with a new Pymont Metro station, a near zero-parking precinct should be targeted, in which parking for private vehicles is not provided for except for those categories that need to be provided by exception (such as carers, disabled, visitors and appropriately scaled car share).</p> <p>A near zero-parking precinct supports Key Move 4 of the PPPS, to provide multi-utility hubs as precinct infrastructure to reduce the need for on-site parking noting that the multi-utility hubs can provide additional benefits.</p> <p><u>Urban Design</u></p> <p>The City asserts that the proposal presents a poor urban design outcome with unacceptable impacts to future residents and users with key issues including:</p> <ul style="list-style-type: none"> - The proposed built form is not well-considered and is incongruent with the surrounding Pymont context. - Future residents' health and wellbeing will suffer as they are exposed to noise and air pollution. - Adverse wind impacts make uncomfortable and unsafe public spaces for users and insufficient solar access is provided to public spaces for good tree and grass growth. - The public space, particularly the narrow waterfront promenade and the streets, is inadequate for people who will use it. It is not a reflection of Key Move 1 of the PPPS for a "world class harbour foreshore walk". - Requirement for 5% of residential floor area as affordable rental housing is inadequate. - Stronger connection with Country secured through planning controls is required. <p><u>Built Form</u></p> <p>The City advocates for building forms that best suit the land use mix, which aligns with the PPPS. Specifically, enterprise-focussed, media, creative and other knowledge intensive industries that have a distinct low scale, campus style building typology that would better complement the Pymont neighbourhood and aligns with the urban quarter and commercial character envisioned for the precinct.</p> <p><u>Wind</u></p>

Council	Comment
	<p>The City strongly recommends that the Precinct Plan must be redesigned to eliminate unsafe and uncomfortable pedestrian wind environments by implementing good design practice as follows:</p> <ul style="list-style-type: none"> - Place lower buildings in front of tall buildings on wind exposed sides, this may require the rearrangement or reduction in the number of tall buildings where this is not currently shown; - Increase the setbacks between the street wall and tower forms from the predominate three and six metres to at least eight to ten metres or more if required, in consultation with wind specialists; - Further rounding of tower forms; - Reduction in tower floor plate size; - Increasing the separation of towers; - Coordinate awnings with street design requirements; - Investigation of additional points on bicycle lanes, footpaths opposite buildings with awnings and at street crossing points and in colonnades; and - Provide summary diagrams for standing comfort at street crossings and likely building entry points and sitting comfort where sitting is proposed and test solutions to ensure that it can be provided at future approval stages. <p><u>Public Domain</u></p> <p>The City recommends that streets should conform with the City's Street Design Manual and all require greater allocation of space for pedestrian movement.</p> <p><u>Foreshore Promenade</u></p> <p>The City strongly recommends a minimum width of 20 metre be provided to allow for flexibility, tolerance and to accommodate special circumstances. Wherever possible, the foreshore width should be widened to the preferable 30 metres to include additional landscaping, exercise equipment, places for groups to pause, areas for outdoor dining, and more separation of the movement paths.</p> <p><u>Sun Access</u></p> <p>The City strongly recommends that the precinct plan be redesigned to provide at least the minimum required amount of solar access in the winter solstice between 9am and 3pm as follows:</p> <ul style="list-style-type: none"> - 4 hours to at least 50% of each of the two parks: <ul style="list-style-type: none"> o the north park around the Glebe Island Bridge o the eastern foreshore in the south on the existing fish market site, excluding the new fish market site - 2 hours to most of the new streets to promote tree growth. <p>The solar analysis must include PPPS sites capable of change outside the precinct as these too will impact on solar access available.</p>

Council	Comment
	<p data-bbox="584 237 836 259"><u>Air Quality and Noise</u></p> <p data-bbox="584 282 1422 483">The City notes that the proposal does not consider the NSW Government's document '<i>Development Near Rail Corridors and Busy Roads Interim Guidelines</i>' and recommends that the Precinct Plan be redesigned to ensure protection for people's health and wellbeing from the impacts of noise and air pollution by the placement of apartment buildings away from the noise sources.</p> <p data-bbox="584 506 1161 528"><u>Apartment Design Guide (ADG) Compliance</u></p> <p data-bbox="584 551 1406 618">The City notes that the proposal does not comply with the ADG in the following areas and recommends that this be addressed:</p> <ul data-bbox="632 640 1177 797" style="list-style-type: none"> - Building separation; - Residential floorplate site; - Natural cross ventilation; and - Overshadowing of neighbouring buildings. <p data-bbox="584 819 810 842"><u>Affordable Housing</u></p> <p data-bbox="584 864 1430 1066">The City recommends a minimum 10 percent of residential floor area on private sites should be provided for as affordable rental housing as per the Region Plan noting that the City of Sydney's Local Strategic Planning Statement, City Plan 2036, expects a minimum 25 per cent of residential floor area should be provided for as affordable rental housing on NSW Government owned land.</p> <p data-bbox="584 1088 1417 1223">The City seeks all affordable rental housing to be provided in perpetuity with 10 per cent or more of the affordable housing to be provided as culturally appropriate Aboriginal and Torres Strait Islander housing.</p> <p data-bbox="584 1245 963 1267"><u>Aboriginal Cultural Engagement</u></p> <p data-bbox="584 1290 1417 1424">The City notes the work of INSW in seeking input regarding aboriginal cultural engagement and recommends that the opportunities identified in the Aboriginal Cultural Engagement report be secured in the proposed planning controls including:</p> <ul data-bbox="632 1447 1382 1682" style="list-style-type: none"> - Affordable housing for Aboriginal and Torres Strait Islander people; - Economic opportunities; - Fishing economy and industry; - Maritime usage; and - Aboriginal culture centre and innovation hub. <p data-bbox="584 1704 699 1727"><u>Public Art</u></p> <p data-bbox="584 1749 1366 1816">The City recommends immediate implementation of the Public Art Strategy and creation of a Public Art Plan.</p> <p data-bbox="584 1839 724 1861"><u>Productivity</u></p> <p data-bbox="584 1883 1406 1982">The submission supports the proposed amendments to Sydney LEP 2012 to rezone development sites within the precinct from B3 Commercial Core to B4 Mixed Use together with the proposed clause</p>

Council	Comment
	<p>prescribing a minimum non-residential floor space to some sites within the precinct.</p> <p>The submission supports and recognises the importance of safeguarding the economic role of key places within the City Fringe including Blackwattle Bay in prioritising business, knowledge-intensive, creative and other enterprise activities in mixed use areas from residential demand.</p> <p>The submission recommends that that the Economic Development, Local Retail and Services Report:</p> <ul style="list-style-type: none"> - includes consideration of the types of buildings or space requirements for target industries - highlights the real opportunity of the Blackwattle Bay site's connectedness to the waterfront; - considers the value of the night time economy; and - includes analysis of the net job creation, specifically taking the potential jobs loss away from the equation, which is caused by workers and residents in the catchment area diverting consumption demand from neighbouring shopping area such as Broadway or Harbourside. <p><u>Sustainability</u></p> <p>The City asserts that the rezoning proposal is inconsistent with Direction 8, Key Move 4 and the Blackwattle Bay sub-precinct priorities of the PPPS as the EIE and draft Design Code lack any commitment to the sustainability interventions and performance criteria outlined by the PPPS. The City notes that the opportunities identified in the ESD report have not been carried through to the draft planning controls.</p> <p>The submission makes the following recommendations:</p> <ul style="list-style-type: none"> - The proposal should identify suitable parcels of land for the ideal location of multi-utility hubs; - The proposal should rectify inconsistencies between the Water, Riparian Land, Flooding and Stormwater Report, prepared by Cardno and the ESD report which identifies the opportunity for WSUD features in the precinct; - The proposal should pursue opportunities to convey harvested water from the Precinct to Wentworth Park; and - The proposal should include the green roofs described in the Urban Forest Strategy in the draft Design Code, notably, consideration to the street wall and podium buildings presenting opportunities for green roofs that could be used as communal spaces for office workers below or residential users above; and - The proposal should incorporate provisions to ensure setbacks achieve deep soil and canopy cover outcomes unimpeded by driveways, basement car parking and other structures, agreed at concept plan stage; - The proposal should consider wind impacts noting that tree planting is not considered to be an amelioration tool;

Council	Comment
	<ul style="list-style-type: none"> - The proposal should apply the City of Sydney Net Zero Buildings Strategy to all new mixed use, office, hotel and residential development; and - The proposal should ensure polluted sediment remains undisturbed and that strategies for extraction capture and disposal of the most polluted sediments are developed. <p><u>Governance and process</u></p> <p>The City objects to the rezoning proposal noting inconsistency with Direction 4 of the Pyrmont Peninsula Place Strategy to establish a unified planning framework. The submission opposes the approach taken in the EIE which fragments the planning controls through:</p> <ul style="list-style-type: none"> - The nomination of the precinct as a Public Authority Precinct under the Infrastructure SEPP which establishes exemption from public domain improvements; and - The continued application and extension of the SRD SEPP over the precinct which establishes that proposals with a CIV greater than \$10m are considered to be State Significant Development for which the Planning Secretary is the consent authority. <p>In particular the submission recommends:</p> <ul style="list-style-type: none"> - That clarity should be provided on the ownership, control and ongoing management of the public spaces; - That the proposal should be redesigned based on the lack of evidence for the land use mix and concerns regarding the public space layout with ensuing concerns regarding the proposed height and FSR; - That the application of clause 6.21(5) of Sydney Local Environmental Plan 2012 be maintained, enabling 'triggers for design excellence competitions to apply in the precinct'.

NSW Government Submissions

Submissions were received from the following NSW government agencies:

Agency	Comment
Water NSW	No objections or issues.
Sydney Water	<p>The submission recommends:</p> <ul style="list-style-type: none"> - That INSW liaise with Sydney Water as soon as possible to ascertain watermain connection sizes, impact on gravity systems and connection locations. - That INSW lodge a feasibility with Sydney Water, if they have not done so already, to facilitate these discussions and potentially link to the proposed Sydney Water SPS002 renewal project. - That sustainable development initiatives including investigation of precinct scale recycled water, healthy waterways and integrated water management be supported.

Agency	Comment
Sydney Local Health District	<p>The submission raises concerns about with the height and density proposed for the major buildings on the site: a significant change to the local area. Buildings proposed are up to 45 storeys, and are aligned to about the Western Distributor noting that siting may subject these dwellings to traffic noise and pollution.</p> <p>The submission recommends:</p> <ul style="list-style-type: none"> - Recommends increased (10-15%) contribution for affordable housing.
Environment Protection Authority	<p>The submission notes that the draft Design Code would benefit from including information to help guide design approaches for both the precinct and built form to minimise risk from exposure to air and noise pollution and that the Design Excellence process could also support innovative approaches.</p> <p>The submission seeks further information regarding:</p> <ul style="list-style-type: none"> - Any opportunities to provide the sustainability initiatives proposed in the Pyrmont Peninsula Place Strategy including multi-utility hubs should be recognised in the proposal; - The proposal should provide sufficient noise monitoring data to ensure it satisfies key study requirements and supporting guidelines including the Noise Policy for Industry (NPI) (EPA, 2017); - The microclimatic effects on air pollution should be clarified; - Waste minimisation strategies should be detailed for the precinct. <p>The submission recommends that a range of further matters to be considered in developing the Code, and recommends:</p> <ul style="list-style-type: none"> - That buildings should be set back from busy roads and ensure that utility rooms, rather than private open space, living rooms and bedrooms face busy roads. - That controls to support water quality initiatives be developed. - That additional planning controls be developed to specify necessary site remediation including staging.
Fire and Rescue NSW	No objections or issues.
CASA and Sydney Airport	No objections or issues.
Schools Infrastructure NSW	<p>The submission notes that local schools are expected to experience a small growth in student numbers and notes that a combination of asset improvement and non-asset solutions across these schools could be required to accommodate the projected enrolment demand.</p> <p>The submission supports the delivery of opportunities for greater public transport, walking and cycling within the precinct boundary and makes the following recommendations:</p> <ul style="list-style-type: none"> - Requests that the SSP prioritise student pedestrians via the following additions to this assessment: <ul style="list-style-type: none"> o School Walking Catchment and User Paths o Mode Share data o Notable travel behaviours of the school community o Preferred active and public transport routes

Agency	Comment
	<ul style="list-style-type: none"> - Requests that the draft Design Code include controls to protect the amenity of existing schools.
Heritage NSW and the Heritage Council	<p>The submission supports the Interpretation Strategy/Plan identified initiatives regarding archiving, salvaged materials and media panels which are considered to have a positive heritage outcome and makes the following recommendations:</p> <ul style="list-style-type: none"> - Notes and recommends that the upfront acknowledgement, preliminary statement of intent and integration of Aboriginal cultural heritage considerations throughout the supporting studies represent a strong holistic approach which should be continued in future stages of planning and delivery. - Recommends that the identified early and ongoing respectful consultation and engagement with Aboriginal stakeholders, is positive and should continue. - Recommends that future development should consider minimal disturbance activities for those areas identified as having moderate Aboriginal archaeological potential - Recommends that further assessment be undertaken to determine the potential significance of the 'Wharf-front warehouse' at 1-3 Bank Street, Pyrmont, and inform potential listing and management measures. - Requests clarifications within the Maritime Archaeological Assessment noting that the assessment is considered satisfactory. - Recommends preparation of an historical archaeological assessment to establish the presence and significance of any 'early industrial' remains on the foreshore and, if found, appropriate management measures.
Greater Sydney Commission	<p>Recommends preparation of an infrastructure contributions framework, including potential Strategic Infrastructure Compact and alignment with City of Sydney local infrastructure contributions planning, noting concerns regarding application of SAC clause.</p>
NSW Fisheries	<p>Recommends water quality measures including:</p> <ul style="list-style-type: none"> - Measures to mitigate Acid Sulfate Soil impacts, soil contamination impacts and erosion and sediment impacts to the aquatic environment. - Design of new seawalls should be in accordance with environmentally friendly seawall methodology 'A Guide to Improving the Environmental Value of Seawalls and Seawall-lined Foreshores in Estuaries'. - Existing seawalls should be retro-fitted with appropriate environmentally friendly features. - Water Sensitive Urban Design (WSUD) features should be incorporated where appropriate.

Agency	Comment
	<ul style="list-style-type: none">- Light penetration features should be incorporated into over-water structures to allow light to start food-chain ecology under hard structures. - Artificial reef or underwater statues should be fitted to the base of seawalls to improve fish habitat quality.
Port Authority of NSW	<p>Recommends preparation of an overarching Maritime Risk Management Plan for Blackwattle Bay, considering existing and proposed development, to be prepared in consultation with Port Authority and the Harbour Master.</p> <p>Recommends consideration of lighting and signage design in the vicinity of jetty or wharf structures and Aids to Navigation.</p> <p>Supports an integrated land use model supporting existing working harbour and maritime industry.</p>

Attachment A - Form submission lodged by 1430 individuals via the CampaignNow.org website of Mr Jamie Parker, Member for Balmain

*I am writing to make an objection to the **State Significant Precinct Study**.*

While it is clear that this site needs to be renewed following the relocation of the Sydney Fish Markets, the proposed rezoning and changes to planning controls that have been put to the public at this time are in my view unacceptable.

Our community wants a plan for this site that prioritises public access to the waterfront and greenspace not over-development. In particular, I'm concerned that:

High-density housing development will monster the foreshore and overwhelm local infrastructure

The proposal would see up to 1,550 apartments allowed on the current Sydney Fish Market site in 45 storey towers. The residential towers will be taller than the Anzac Bridge pylons and will monster the foreshore.

Residential development at this scale will put overwhelming pressure on local schools, parks and basic infrastructure which are already at capacity.

The proposed controls are designed to set out the maximum potential yield for the site and without specific mechanisms to prohibit modification applications, proposals to increase Floor Space Ratios, building heights and footprints are likely to follow.

The proposal will also create an imposing wall of towers on the site which will even overshadow public space and even cast shade over the solar panels on the new Sydney Fish Market development. This project can't even comply with the absolute minimum standard for solar access on public spaces. It is disappointing that the approach of Infrastructure NSW is focused on realising a business case rather than providing best practice in design and planning.

Lack of provision for social and affordable housing

This proposal completely fails to address the critical need for social and affordable housing. While other jurisdictions around the world are delivering a 50% mix of affordable housing in similar developments, this proposal offers a miserable 5%. It is especially important to ensure there is a diverse housing mix when development occurs on public land, as this one does.

Cumulative impacts on traffic, public transport and local parking

Once the new Sydney Fish Market is built, visitor numbers are expected to double to 6 million a year, in addition to the 1,550 new apartments now being proposed. The transport modelling fails to adequately address the cumulative impact of both the Fish Market and the proposed residential development.

Transport access is inadequate with the light rail currently at capacity (pre-COVID) with minimal opportunity for expansion, the on-demand ferry to the Fish Market

was a failure and the proposed Sydney Metro stop is a significant distance from the site, not to mention inhibited pedestrian access.

Lack of quality open greenspace

This proposal would see 70% of this site dedicated to the private use of residents, offices and shops. The remaining 30% will be used for walk-ways, roads and a small portion of greenspace – much of which is actually under the Western Distributor in shade.

COVID-19 has made it abundantly clear that accessible public space is a key ingredient of healthy and liveable places. Proposing to lock-up 70% of this site for private use is unacceptable.

Reduced public access to the foreshore

While residents may be able to walk along the foreshore on a narrow 10m wide path under this proposal, this walk won't look anything like the existing naturalised Glebe Foreshore which is characterised by parks – Jubilee, Federal, Blackwattle Bay and Bicentennial.

The waterfront will be transformed into a glorified shopping precinct with private restaurants and businesses given prime foreshore positioning at the expense of public access. There is also the concern that private landholders in the precinct will not develop their property, raising serious doubts about the ability to deliver a connected walk along the foreshore.

The proposed public walkway could take decades to eventuate as the government is not ensuring that private landholders along the walk redevelop their sites to permit public access. Our community wants naturalised foreshore access right around Blackwattle Bay with ample space to accommodate active and passive recreation.

No mechanism for value sharing

Rezoning Blackwattle Bay will deliver once-in-a-lifetime windfalls in property value uplift to three private landholders within the precinct. These gains will be completely unearned, delivered by virtue of a change in planning controls that will allow higher and more intense use of the land, making it exponentially more valuable for sale to prospective developers.

A fair proportion of this windfall profit should be returned to the community through the inclusion of a value-sharing mechanism in the planning controls.

Considering all these factors, I cannot support this rezoning proposal and urge the Department of Planning to reject Infrastructure NSW's application and ensure that the City of Sydney becomes the consent authority.

Attachment B - Form submission lodged by 20 owners of 120 Saunders St, Pyrmont

As the resident of this building, we strongly believe that this development creates the following concerns and negatively impact us:

a) Character: While it is mentioned the current plans have been developed in consideration of the character of the neighbourhood the following attributes of the development negate that:

- o Setbacks and building height: The proposed buildings reaching higher than 18 stories it does not consider the current building heights along Bank Street which is a major setback.*
- o Location and size of private open space: Consultations in the past advised the Department of Planning to increase the number of open spaces considering Pyrmont to be one of the highest density suburbs. The current plans overlook the recommendation. The large mixed-use towers will occupy what was intended to be allocated open space with only small land allocated for open space, thus compounding the current issue of the suburb density.*

b) Overshadowing: The developments along the intersection of Quarry Master Drive and Bank Street will significantly overshadow the Bayview Towers, 120 Saunders Street. The positioning of new towers in the current plans does not provide an accurate assessment. This will lead to a loss of re-sale value for all the apartments.

c) Overlooking/loss of privacy: The residential & commercial use of the tower along Quarry Master Drive and Bank Street will create overlooking and loss of privacy and have a negative impact on us and the residents. Bayview towers were created with many apartments with balcony doors and windows facing the bay and Bank Street. The loss of privacy will negatively impact the living often resulting in residents having to down their blinds or installing other mechanisms.

d) Visual bulk of building: The development of the intersection of Quarry Master Drive and Bank Street will result in large, bulky buildings impacting the outlook of neighbours and dominate private open space areas such as apartment balconies facing the bay. The proposed developments would discourage many residents to enjoy the outdoors and prevent them from enjoying access to sunlight as they do as a result of overshadowing.

e) Overdevelopment: The plans suggest the Department's view is to go for a balanced outlook; however, this is not accurate. The addition of hundreds of apartments and office space will be considered as overdevelopment of an already congested area. As highlighted above the current fish market and private land should have been opened for the residents to have better access to open land.

f) Residential noise and vibration: The current assessments advise the buildings will be planned in accordance with the codes to ensure the occupants of new towers, are not impacted by noise with correct distance & height. However, the current plan fails to advise how the new construction will have an adverse impact on residents of Bayview Towers, 120 Saunders Street along Bank Street. With the increased development the noise pollution & vibration must be understood by doing the following:

- *assessment done for 120 Saunders Street now to ensure the current noise pollution as per the standards incorporated into the development*
- *ensure take the above assessment into account when factoring the building heights of the proposed construction*
- *provide noise & vibration reduction for current & future residents by putting large glass panels along the Anzac bridge to deflect the noise*
- *provide appropriate noise reduction for 120 Saunders Street through Noise Abatement Programs such as Double-Glazing Door & Windows and Noise reduction curtains*

In consideration of the above concerns, I and residents of <apartment no.>/ 120 Saunders Street, Pyrmont believe the heights of the buildings must be reduced significantly to not have an adverse impact. Furthermore, great effort needs to be put into understanding how the proposed plans negatively impact an already noisy and densely populated Pyrmont and in the particular intersection of Quarry Master Drive and Bank Street.

DRAFT