Community Submissions with Attachments for Blackwattle Bay

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Acknowledgment of Country

The Department of Planning 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.

Publishing Submissions

The Department has published all submissions received during the public exhibition of the Blackwattle Bay State Significant Precinct Study, proposed master plan and draft planning controls to ensure that all stakeholders understand and can respond to the range of issues raised in submissions. The Department has also published it's Summary of Submissions report and a letter of issues and recommendations to Infrastructure NSW.

Making a submission is entirely voluntary and there is no obligation to provide the Department with any personal information when making a submission and some submissions have been lodged with the Department requesting that personal details be withheld from publication. Where privacy has been requested submissions and associated attachments have been redacted prior to publication.

Submissions have been grouped and published in the following documents:

- Redacted Submissions
- Redacted Submissions with Attachments
- Community Submissions
- Community Submissions with Attachments
- NSW Government and Council Submissions

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179941

alexandre

ultimo

Please refer to our Submission file above.

Friends of Ultimo

FRIENDS OF ULTIMO
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To
Department of Planning, Industry and Environment
Blackwattle Bay redevelopment submission

18 *August, 2021*

SUBMISSION
Blackwattle Bay
State Significant Precinct Study

Friends of Ultimo (FoU) is a community action group, founded 10 years ago, which aims to address local Ultimo issues. We communicate with our 300 members through regular emails. Our Facebook page has around 120 followers and that number is growing steadily

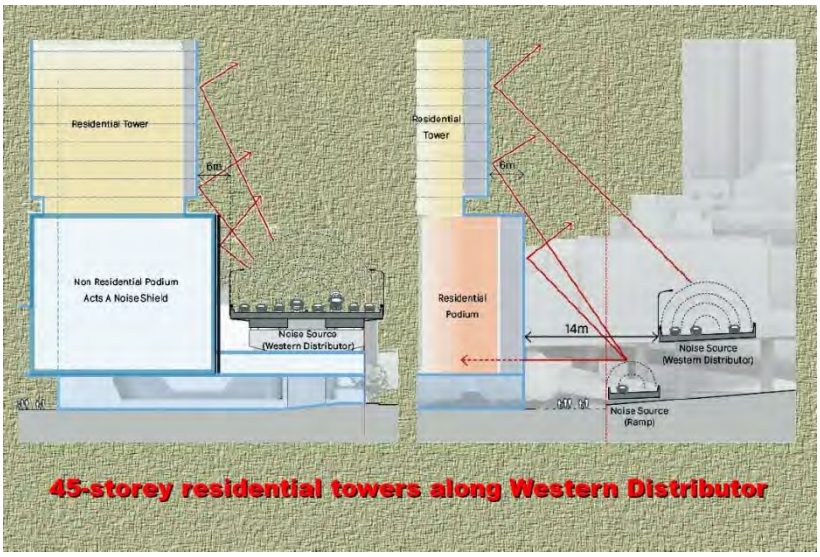
Although we primarily concentrate on local Ultimo issues, we cannot ignore the proposed transformation of the old Fish Market, just North of Ultimo, into a massive, Barangaroo style, over-development. Many of our members live in or near north Ultimo and while many of them would not be physically impacted by the development proposal, their day-to-day quality of life would be profoundly degraded by the proximity of the proposed oversized buildings, lack of community open space and amenity.

Blackwattle Bay is a sub-precinct of the Pyrmont Peninsula Place Strategy (PPPS – Dec 2020) which describes it as "*a place of transformation and renewal*".

Our specific concerns regarding the development proposal are the following

1- <u>DENSITY AND BUILDING HEIGHT</u>
The development would potentially include 1550 dwellings for about 2800 new residents. This is 36% more than the already unacceptable *2055 new residents* anticipated in the PPPS (page 66).
Tower blocks would be up to 45m in height - **taller than the adjacent Anzac Bridge pylons** and considerably taller than the residential buildings in adjacent North Pyrmont/Jackson Landing.

-2- <u>RESIDENTIAL TOWERS ALONG WESTERN DISTRIBUTOR</u>
Some proposed residential buildings are directly adjacent to the Western Distributor exposing future residents to traffic noise and fumes.
This is inconsistent with PPPS Direction 9 (page 33): "Great homes that can suit the needs of more people."



-3- <u>LOSS OF AMENITIES FOR ADJACENT PYRMONT AND ULTIMO RESIDENTS</u>

The proposed 45m towers would overshadow Wentworth Park, Pyrmont and Ultimo and deprive Pyrmont residents of their harbour views.

They would similarly overshadow the proposed Foreshore Promenade, Urban and Waterside Parks and Bank St Open Space.

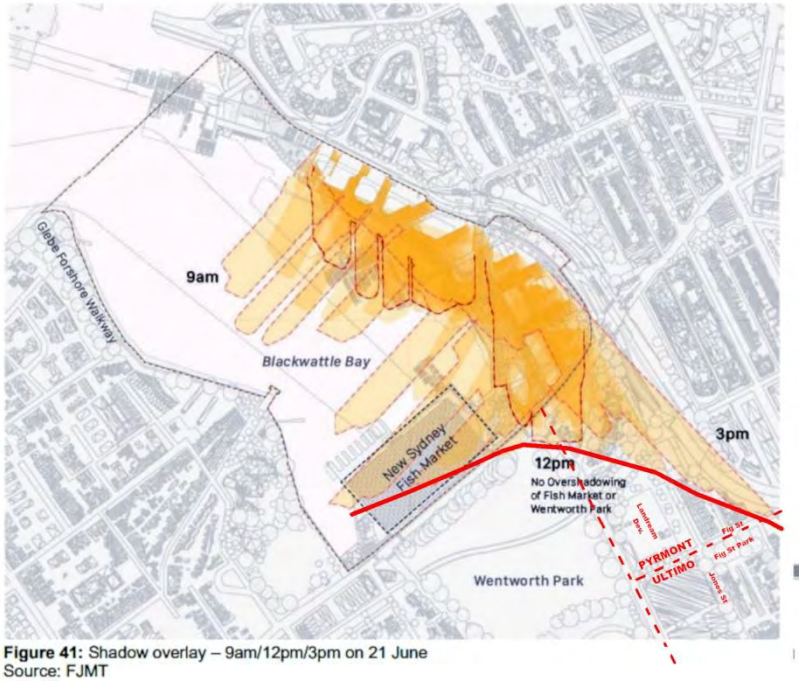


Figure 41: Shadow overlay – 9am/12pm/3pm on 21 June
Source: FJMT

This is inconsistent with the following PPPS provisions:

- Direction 2 (page 25): that "*Development (should) complement or enhance that area*."
- Blackwattle Bay sub-precinct priority 6 (page 67): to "*Establish controls to ensure development protects sunlight to existing and future open space…*"

-4- <u>ABSENCE OF SOCIAL HOUSING AND PUBLIC AMENITIES</u>

The proposal does not include any provision for social housing and allows only a minimal 5% of floor area for affordable housing (which could be offset by payment of a lump sum by the developer). This would contribute significantly to the "gentrification" of Pyrmont and the Peninsula, while accelerating the migration of lower-income populations away from the city.

This is inconsistent with PPPS Direction 9 (page 33 - "*Great homes that can suit the need of more people*") in particular that
"*New housing:*
- should deliver a diversity of housing types and tenures to suit different household sizes, configurations and needs.
- should be affordable to ensure a mix of people can continue to live in the Peninsula.
- should aim to boost social and affordable rental housing with market housing."

There are no provisions for the essential amenities such as schools, child-care and health care facilities necessary to cater for the needs of 2800 proposed residents.
Specifically, the proposal does not include a new primary school, when the Ultimo Public School, the only current example in the Peninsula, is expected to reach capacity very soon.
Note: the proposed development is likely to house 100 additional school children (according to the 2016 census, school children represent 4% of Pyrmont population) in addition to those who will live in the already-approved Landream development on Wattle St.

-5- <u>FORESHORE PROMENADE AND GREEN AREAS</u>
The proposed foreshore promenade is nothing more than a heavily-promoted shopping/entertainment boulevard (Barangaroo style). It would be overshadowed by the high-rise buildings to the East.
Further, the 10 metre wide promenade proposed is too narrow to be "world class", as described in PPPS Big Move 1 (page 36): *"A world-class harbour foreshore walk."*- and should be expanded to at least 30 m as appropriate.

The Bank St Open Space is located under the Western Distributor/Anzac Bridge Approach (where there was no room for another high-rise tower?)
This is inconsistent with PPPS:
- Direction 5 (page 29) "*A tapestry of greener public spaces and experiences*"
- Big Move 5 (page 40): "*More, better and activated public space*"

-6- <u>CONSULTATION</u>
Finally, we are generally concerned about the numerous major developments the Government is progressing during the current pandemic when community consultation and organisation is difficult.

We are further concerned by the fact that so-called public consultation on the project to date has been systematically manipulated.

Example: we were asked last year to choose between 3 equally dense and unacceptable options (all-office, all-residential or a mix of both). We are now told that the "mixed solution" retained was chosen by "the public"!
This is inconsistent with PPPS Direction 10 (page 34): "*A collaborative voice*."

In conclusion Friends of Ultimo believe that:

- Public consultation on this "State Significant" project has been totally inadequate.

- The proposed density and building heights are considerably too large and would **not "*complement or enhance the area*" but, instead, would result in poor living conditions for future residents and significant loss of amenities for existing residents**

- The project's total lack of public housing and its minimal affordable housing are not acceptable.

- The lack of proposed public amenities is inconsistent with accommodating 2800 new residents.

- The Foreshore Promenade and Green Spaces are inadequate and definitively not the "world class" community facilities that local residents have been led to expect.

Patricia JOHNSON & Jean-Pierre ALEXANDRE

Friends of Ultimo

FriendsofUltimo@ultimofriends

165286

Bea

Balmain 2041

Proposal for a neighbouring site that might have some relevance to the current considerations for the revitalisation of Blackwattle Bay:

Turn the current vacant site and building of the White Bay Power Station into an artisan village. The aim would be to preserve and utilize this historic and iconic site as a creative hub that would drive economic activity and creative innovation in the area.

(See the attached document for the full proposal)

Proposal: Artisan Village at the White Bay Power Station Site

Context

In response to the call for community feedback for the revitalisation of Blackwattle Bay (open until 20 Aug 2021), here is a proposal for a neighbouring site that might have some relevance to the current considerations for the revitalisation of Blackwattle Bay.

Proposal

Turn the current vacant site and building of the White Bay Power Station into an artisan village. The aim would be to preserve and utilize this historic and iconic site as a creative hub that would drive economic activity and creative innovation in the area.

Various facilities that support artisan work would be available / built on the site. Examples of such facilities / activities might include:

- Beer making facilities / brewery
- Meat curing
- Bakery
- Pottery oven
- Jewelry making
- Forge / iron works

The economic / income-generating aspects around these facilities might include:

- Courses that include a subscription to use certain facilities (eg. 5xtimes usage, 1mo, 3mo, 12mo)
    - Eg. Students would have access to beer making facilities over a course of time
    - Expert artisans might be commissioned / subsidised to host courses
- Talks and workshops by experts on certain activities
- Permanent shop-fronts / on-premises work spaces for artisans
- Popup shop / cafe rental options available (eg. experimental food cafe)
- "We-Work-type" shared co-working space (subscription)
- Rental space for creative activities (eg. dance / art studios ...)
- Exhibition space
- Hosting of shows (regular comedy, theatre - like Carriageworks)
- Cafes / food trucks to service the space
- Market space for designers / traders (weekend markets, night markets)
- After-school care/tutoring/craft
- School tours and workshops
- Business workshops

The above is a list of some of the ideas that could be implemented in the space.

A key feature of this proposed centre is that it would be focused around a core selection of artisan activities that have the relevant facilities (usually hard to access) built in (eg. brewing/baking/forge facilities). These facilities would be available to the public through subscriptions / courses.

An objective would be to ensure that the space is optimally utilized, with certain areas being rotatable/transformable to accommodate different types of activities at different times (versus having custom built spaces that remain vacant for a large part of the time). Full occupancy gives a positive impression of a bustle of activity (many similar spaces have a lot of vacancies, creating a perception of emptiness and not much going on)

Here are a few examples of similar centres (note how the proposed one will be different by enabling access to unconventional/inaccessible creative facilities)

- Carriageworks
- The Grounds, Alexandria
- The Old Biscuit Mill, Cape Town, South Africa [link]
    - Highly desirable venues, hard to get a booking
        - https://theoldbiscuitmill.co.za/tenants/the-test-kitchen/
        - https://theoldbiscuitmill.co.za/tenants/the-potluck-club/
- Telliskivi Creative City, Tallinn, Estonia [link]

180531

Bottomley

Pyrmont 2009

Thank you for taking the time to read thought our concerns

To Whom it may concern,
Department of Planning, Industry and Environment
Blackwattle Bay redevelopment submission

As the resident/ owner of Bayview apartments Unit 7 120 Saunders St, Pyrmont NSW 2009 we had received notification of the development plans submitted for Blackwattle Bay redevelopment along with the technical documents as plans on display. The current plans call for significant mixed-use development along Bank street with towers close to 18 stories and adjacent buildings even higher.

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:
- 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.
- 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.

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:

- a) assessment done for 120 Saunders Street now to ensure the current noise pollution as per the standards incorporated into the development
- b) ensure take the above assessment into account when factoring the building heights of the proposed construction
- c) provide noise & vibration reduction for current & future residents by putting large glass panels along the Anzac bridge to deflect the noise
- d) 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.

Looking forward to a favourable and considerate response.

Yours faithfully,

Graham and Rhonda Bottomley

182411

Breen

Birchgrove 2041

I do not support Infrastructure NSWâ€™s precinct plan for Blackwattle Bay released on 2 July 2021.

Urban renewal creates opportunities for increasing biodiversity and restoring our natural heritage. The plan should provide for the reestablishment of the natural heritage and biodiversity of Blackwattle Bay as a primary objective and the built form should be designed taking that into account.

The plan does not have adequate justification to proceed and should not proceed. Alternative plans must be provided for consideration by the community.

Please refer to the attached submission.

Francis Breen

1/28 Cameron Street

Birchgrove NSW 2041

Department of Planning, Industry and Environment
Blackwattle Bay redevelopment submission
Parramatta NSW

Blackwattle Bay State Significant Precinct (SSP) Study

Please accept this submission in respect of State Significant Precinct (SSP) Study. I am a resident of Birchgrove and I hold a BA (Econ) Macquarie University and Graduate Diploma (Environmental Studies) Macquarie University. For many years I have been doing bushcare in my local area and I have been active in local conservation groups. I was a Councillor at Leichhardt Municipal Council from September 2012 to May 2016 where I experienced first-hand the operation of the planning laws.

I do not support Infrastructure NSW's precinct plan for Blackwattle Bay released on 2 July 2021 for the following reasons:

1) It would allow a massive overdevelopment of the current site, including multiple high-rise towers of enormous bulk and scale dominating its surroundings;
2) It blocks views of Blackwattle Bay from Pyrmont and Glebe;
3) The taller of the multiple towers will overshadow the other buildings and the proposed newly built Fish Markets and its solar-panelled roof;
4) The current documentation lacks full consideration of traffic, parking and public transport, including buses and light rail;
5) It lacks a business case for creating further office space as an extension of the Sydney CBD when demand for CBD office space is forecast to continue declining, especially in the context of two other new tech hubs at Central Railway Station and Balmain Power Station;
6) Its purported aim of using and optimising government-owned land to deliver economic outcomes comprises privatisation of currently publicly-owned foreshore lands; and
7) In design and intent, it prioritises maximising developer profits over and above creating people-friendly spaces that promote a sense of community and belonging.
8) The plan does not adequately provide for enhancement of our natural heritage and biodiversity.

Strategic context and justification

The justification for a wall of nine massive high-rise towers of between 7 stories and 45 stories high, close to the foreshore, with a total gross floor area (GFA) of approximately 234,000 square metres as compared to alternative designs has not adequately been explained.

The strategic context and justification states (p60),

Renewal as envisaged by the precinct plan would provide more housing for almost 3,000 residents

The basis for providing for almost 3,000 residents as compared to a lesser number or a greater number is not explained. A lesser number would be more appropriate to avoid massive high rise towers.

Similarly the total gross floor area (GFA) of approximately 234,000 square metres with allocation of 50 per cent of total floor space to non-residential purposes, inclusive of the new Sydney Fish Market as compared to some other GFA is not explained. A lesser GFA would be more appropriate taking into

account demand for CBD office space is forecast to continue declining, especially in the context of two other new tech hubs at Central Railway Station and Balmain Power Station

The strategic context and justification also states (p60),

The proposed rezoning of Blackwattle Bay will deliver significant economic benefits. It will create 17,000 construction jobs (direct and indirect) and 5,500 ongoing jobs, deliver approximately 1,550 dwellings and provide for an extensive network of open space and other infrastructure improvements

This is a bald statement that does not take into account the opportunity costs of the plan. The benefit cost of the plan shown in table 3.2 (p185) of 2.36 may well be matched or bettered with a less intensive or alternative plan and does not in itself justify the plan.

The benefit cost of the plan does not take into account the negative aspects to the points I raised above and the ratio would be drastically impacted downwards when these are included.

The plan does not have adequate justification to proceed and should not proceed. Alternative plans must be provided for consideration by the community. Such alternative plans should not create the same outcomes as listed in my points 1 to 8 above.

Natural heritage & biodiversity

In respect of point 8, the plan is inadequate as it considers natural heritage and biodiversity after determining the built form. It is merely an afterthought. The plan should provide for the reestablishment of the natural heritage and biodiversity of Blackwattle Bay as a primary objective and the built form should be designed taking that into account.

The open space and tree canopy proposals included in the plan do not re-establish terrestrial natural heritage and biodiversity of Blackwattle Bay. The trees proposed include species that are not native to Blackwattle Bay and open spaces do not provide the mix of vegetation necessary to re-establish the local native fauna.

Similarly the Urban and Marine Ecology Constraints and Opportunities report (attachment 21) on aquatic habitat is based on the constraints that will be created by the built form provided in the proposed precinct plan. Page 44 of the report states,

A healthy balance of species across the food web is desirable. This could largely be achieved through habitat creation, but other indirect impacts from foreshore development could disrupt the desired balance

An example of the inadequate priority currently given to natural heritage and biodiversity is the displacement of threatened micro bats *Myotis macropus* located at the fish market site. These have been dispersed by the redevelopment of the site and there is no evidence that they have successfully migrated to another site.

Conclusion

Urban renewal creates opportunities for increasing biodiversity and restoring our natural heritage. The plan should provide for the reestablishment of the natural heritage and biodiversity of Blackwattle Bay as a primary objective and the built form should be designed taking that into account.

The plan does not have adequate justification to proceed and should not proceed. Alternative plans must be provided for consideration by the community.

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Brooks

Pyrmont, Sydney 2009

As a community representative on the Blackwattle Bay Community Representative Group (â€œCRGâ€), I wish to set on record severe disappointment and disagreement with the design proposed for the redevelopment of the Blackwattle Bay Precinct. The bases of that disagreement are set out in the attached file

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2 August 2021

Department of Planning, Industry and Environment
Blackwattle Bay redevelopment submission
Locked Bag 5022,
Parramatta NSW 2124

State Significant Blackwattle Bay Precinct Report

As a community representative on the Blackwattle Bay Community Representative Group ("CRG"), I wish to set on record severe disappointment and disagreement with the design proposed for the redevelopment of the Blackwattle Bay Precinct. That disagreement is based on three key reasons set out below

1. **The Fish Markets provide quality assurance and food safety processes for wholesale and retail sale of fish throughout Sydney and the State.** They are much more than a local retailer. We see no problem with the State recovering some of that cost by selling the land vacated for appropriate commercial/residential development. But we have very real concerns that the proposed development will quite savagely reduce the amenity and value of many residential properties

We object to the inequity of Pyrmont having to pay the price of the Fish Market development that is a beneficial resource for the whole of Sydney.

2. The proposed height of the three high-rise buildings. They will impose a financial penalty on residents of established buildings by blocking water views from at least four buildings that have uninterrupted views over Blackwattle Bay.

The loss of views represents a severe and quantifiable loss of amenity in a city where a water view commands substantial premium in value.

3. Attachment 15 – Visual Impact and Assessment is flawed. It makes its assessment based on a choice of criteria (listed on page 62) that makes no mention of views experience by residents of Pyrmont. The viewpoints analysed in Part B are limited to two criteria and are misleading, listing the "Receptors" as "Public – local residents, road users and pedestrians". This is far from the truth as local residents are not considered in the assessment.

A New and Unbiased Assessment of Visual Impact is Essential

1. THE BLACKWATTLE BAY PROPOSAL MUST PUT THE FISH MARKET IN PERSPECTIVE

The proposed development of the Blackwattle Bay State Significant Precinct Study ("BBSSPS") is the result of the redevelopment and upgrading of the Sydney Fish Market after many years of planning. The purpose of the BBSSPS redevelopment appears to be recovery of the costs of the Fish Market.

But the Fish Markets have a major role in providing quality assurance and food safety processes for wholesale and retail sale of fish throughout Sydney and the State.

They are much more than a local retailer and tourist attraction.

We see no problem with the State recovering some of that cost by selling the land vacated for appropriate commercial/residential development. But we have very real concerns that trying to recover all costs of the proposed development will quite savagely reduce the amenity and value of many residential properties by proposing high-rise buildings that block views from existing properties.

Reducing the building height and size and spreading some of that cost recovery across the broader beneficiaries of the Fish Market development will allow reduction in building heights and address many of our objections.

2. THE PROPOSED HEIGHT OF THE THREE HIGH-RISE BUILDINGS WILL IMPOSE A FINANCIAL PENALTY ON RESIDENTS OF ESTABLISHED BUILDINGS

Of particular concern is the effect on residents in buildings in the area of Pyrmont Street, Harris Street and Bulwara Road, to the east of the Freeway and all are within the 1 kilometre radius set out in the diagram in Section 7.0 of Attachment 15 – Visual Impact and Assessment

The Paragon Building, 149-197 Pyrmont Street, (1. Below) has balconies fronting Experiment Street with large balconies and views towards Blackwattle Bay

1. Paragon Building – Experiment Street Frontage

The view (2. Below) is from the Paragon west facing balconies..

2. Paragon Building View over Blackwattle & Rozelle Bays

Views like this overlooking Blackwattle and Rozelle Bay will be blocked by the proposed three tower blocks.

The Mirage Building, shown below (no. 3) has many apartments with balconies facing in the same direction as View 12 of Part B, but are 4 and more stories above the photographs used in the, so called, assessment. It has more expansive views of Blackwattle and Rozelle Bays. Its residents have more to lose by the planned development.

3. Mirage Building – Pyrmont Street

Both buildings provide attractive views towards Blackwattle Bay **but no assessment has been made of the planned development impact on those views.**

Another example of failure to assess residential impact is illustrated by the two apartment buildings at 134-150 and 152-168 Bulwara Road (photo 4 below) which also enjoy views of Blackwattle and Rozelle Bays.

4. Bulwara Road Apartments

Loss of View Equates with Loss in Value

All these buildings have been occupied for over twenty years and owners and occupants of these apartment units purchased them when they had uninterrupted views and without any indication that large buildings were planned for the Blackwattle Bay foreshore.

3. ATTACHMENT 15 – VISUAL IMPACT AND ASSESSMENT IS FLAWED.

The basis of selection of viewpoints for Visual Impact Assessment is flawed. The criteria (listed on page 62) make no mention of views experience by residents of Pyrmont. The viewpoints analysed in Part B are further limited to two criteria.

1. Public Open Space Viewpoints and
2. Pedestrian/Road Viewpoints

What is more misleading is that the Viewpoint 12 Impact Assessment (page 90) lists the "Receptors" as "Public – local residents, road users and pedestrians". Clearly this is far from the truth as local residents are not considered in the assessment. This misrepresentation occurs in other viewpoint analyses; eight more in Pyrmont, three in Glebe, two in Balmain and one other in Ultimo.

Any assessment limited to these criteria is facile and is offensive to the residents of Pyrmont, for two main reasons.

First, all view assessments are taken from ground level in a precinct comprised of high density and medium-rise apartment buildings.

Second, residents of such buildings view Blackwattle Bay and its environs from quite different perspectives. Moreover; many residents purchased apartments that have vistas of Blackwattle Bay from balconies designed to provide enjoyment of that view.

The loss of views represents a severe and quantifiable loss of amenity in a city where a water view commands substantial premium in value. Yet there is no assessment of loss of residential amenity. Instead and with total disregard of residents, the assessment states that;

"The Precinct will add a noteworthy new level of built form to the visual scene".

This is a totally inadequate and inaccurate assessment of visual impact and displays complete bias on the part of the assessor towards additional building on the waterfront.

A New and Unbiased Assessment of BBSSPS Development Impact is Essential

REASSESSMENT OF THE BBSSPS WILL PROVIDE EQUITY AND COOPERATION

On behalf of residents of Pyrmont, I request a reassessment of the BBSSPS aimed at reducing building height and size and spreading some of associated costs across the broader beneficiaries of the Fish Market operations.

That reassessment must include a completely new and more independent assessment of Visual Impact that is undertaken in full consultation with residents of Pyrmont and which includes recognition of the impact on the amenity and values of apartments affected by the planned development.

Such a reassessment will address many of our objections while adding a precinct that meets the overall objectives of INSW. (Including "user pays") It also reduces the need for a detailed economic justification.

Yours sincerely

John A Brooks

181306

bullock

Glebe

Submission regarding Blackwattle Bay old Fish Market Site

By Emily Bullock â€“ Emily@emilyvalentine.com.au

The proposed development has a great emphasis on economic gains the increased density will give the project management and the State Government. There is no consideration to the existing community. As part of the community I see the plans as a failure of Infrastructure NSW to govern with any other view than maximum financial gain.

I remind you that we live in a society not an economy! Is there any benefit to society in this bad scheme?

Proposed changes to existing planning controls should not go ahead. We have a democratically elected council who plan and oversee all developments in Sydney. Your plan breaks many of the council by-law etc. and ignores the wish of the community. State planning laws must be amended to allow this construction to happen. Surely that is a sign that this is bad planning!

Your document says â€œMaking the precinct a â€˜public authority precinctâ€™ under the Infrastructure SEPP to make some public domain works, like footpaths, parks and roads exempt development, and a â€˜major event siteâ€™ under the Exempt and Complying Development Codes SEPP to facilitate holding events in the public domain;â€ What does that mean? You want to railroad over all basic policies developed over years of government?

Your own laws must be exempted â€“ Why are the State environmental laws of so little respected by Infrastructure NSW? The community has fought long and hard to set up and maintain the environmental laws, yet you want to wipe them off the books so you can create a monstrosity.

You say, â€œAllow maximum building heights up to RL 156 metres (equivalent to 45 storeys)â€ This is too high. Presently the site has a 5 storey limit which should be enforced. The shadowing, wind tunnels, lack of overall relationship to the other side of the bay are not considered. The only thing considered in this plan is how to make the maximise profits so the state government can pay for the folly of the new fish markets.

This is public land that you intend to give to a â€œdeveloperâ€ and change the laws to allow them to overdevelop the site and leave to the City of Sydney and future State governments to build the infrastructure missing from the proposal. The proposed traffic plan is shoddy. Expecting people to walk and cycle â€“ what about the elderly or wonâ€™t you expect anyone age in this complex? You want to encourage people to use public transport â€“ but it is totally dependant on the light rail, which already has issues with overcrowding.

The intersection under the ANZAC Bridge flyover (on Pyrmont Bridge Rd) is appalling for cars, people and cyclists but there is no mention of any improvements to that. Every new building brings more people to the area but you seem to see buildings only and not deal to the people who will have to get in and out of them.

You ask to â€œintroduce a clause requiring an affordable housing contribution equivalent to 5% of the total residential floor area.â€ The complex should be all public housing as it is public land. If the site can take 1500 apartment plus commercial space (which I donâ€™t think it can) let them all be for the most needy in our society. There are plenty of flats in Sydney empty because investors buy them and keep them empty â€“ What good does that do for the homeless and poor in our community?

The World Health Organisation recommends a minimum of 9 square metres of urban green space for each person and also suggests that an ideal amount of urban green space could be as 50 square meters per person. You boast that there will be lots of green space but I see a few pocket parks, roadways and footpaths. The bulk of the â€œgreenâ€ space is under the ANZAC bridge with its shadow â€“ that will be brown space! Your â€œworld class walkwayâ€ is nothing more than a footpath with bikes! Not a good combination â€“ foot traffic and cycle traffic should be separated.

I will draw your attention to the fraudulent images on your document. This pathway is presented with a view of the water and assess to the bay, sunny and pleasant. If you look at other images you see wharves, which will be surrounded by large boats. None of these images give the oppressive feeling you get from being wedged between high-rise building and large boats blocking the views, or the smell and noise boats give off. Nor the shady, wind swept nature caused by the large building.

Again on Page 85 of THE PRECINCT& VISUAL IMPACT ANALYSIS, we have an image in soft focus implying that the buildings will softly float above us, the light will shine though them and the building of them will be silent and unobtrusive. Not the nasty looming blocks these buildings will be. The images do not indicate the noise of 5years construction. Clouston associates who created these images have failed to truly represent the dominance the development will have on our community. From the corner of Wattle St and Pyrmont Bridge Road we see the dominant Crown casino (which also was exempt from council bi-laws) reflecting blinding light from its wall of glass. This will be an issue too for these proposed buildings, especially to residents in Glebe, Ultimo and Pyrmont. Also none of you visual impact studies looked from your â€œWorld Class foreshore walkâ€. Why not? Nor the new fish market.

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Blackwattle bay is a passive boating area. This project forgets the importance of protecting this asset. More people equals more boats! What about the â€œparty boatsâ€? Will they be there beside the World Class Walkway?

You say â€œThe place-based approach to planning for Blackwattle Bay has involved collaboration with a broad range of stakeholders. In particular, INSW is committed to ensuring the story of systematic and sustainable land management, occupation and cultural heritage of Aboriginal people informs placemaking and planning across the Blackwattle Bay area.â€ (Page 63) What does that mean? Who are these stakeholders? What cultural heritage? A couple of murals? Aboriginal or other wise? Where is the world-class Aboriginal museum Sydney desperately needs? Generalise statement

are litter this bad document. You talk of middens and rock carvings but the ones mentioned in your webinars are not included in where this development is happening but in other parts of the bay.

You promise â€œlow carbon, high performance precinctâ€. As the area is one of the densest populations in Sydney all forms of pollution become an issue. This include shade pollution caused by overdevelop. Noise caused by 24/7 nightlife. Traffic and boat noise and fumes - these issues and ignored in your policy.

I understand that the massive overdevelopment is intended to recoup the $750 million cost of the new Sydney Fish Markets. Reduce the size of it now while you still can! It would have been better to rebuild the Fish Market on the current site. The vendors at the Fish Market objected to having the Market rebuilt while they continued trading. The community lost that fight, but Glebe, Ultimo and Pyrmont residents should not have to pay the price of the recalcitrance of the Market vendors, and the ambitions of the stateâ€™s tourism industry.

I could delve into your documents deeper, but it is barely readable and uses methods to hide the real situation that will come from this money-grabbing project. It is shameful that as a citizen I feel so powerless by this so-called democratic procedure and wonder if this will be read! By creating â€œState-Significant sitesâ€ at the ministerâ€™s whim, undermines this whole document. Public land like this, must be used for the publics good. It must be subject to all council by-laws and protocols. The dominance of these sites under the present NSW Government undermines the communities right to build the local facilities they wish.

Emily Bullock

3/51 Bay St Glebe

0424234448

Submission regarding Blackwattle Bay old Fish Market Site

By Emily Bullock – Emily@emilyvalentine.com.au

The proposed development has a great emphasis on economic gains the increased density will give the project management and the State Government. There is no consideration to the existing community. As part of the community I see the plans as a failure of Infrastructure NSW to govern with any other view than maximum financial gain.

I remind you that we live in a society not an economy! Is there any benefit to society in this bad scheme?

Proposed changes to existing planning controls should not go ahead. We have a democratically elected council who plan and oversee all developments in Sydney. Your plan breaks many of the council by-law etc. and ignores the wish of the community. State planning laws must be amended to allow this construction to happen. Surely that is a sign that this is bad planning!

Your document says “Making the precinct a ‘public authority precinct’ under the Infrastructure SEPP to make some public domain works, like footpaths, parks and roads exempt development, and a ‘major event site’ under the Exempt and Complying Development Codes SEPP to facilitate holding events in the public domain;” What does that mean? You want to railroad over all basic policies developed over years of government?

Your own laws must be exempted – Why are the State environmental laws of so little respected by Infrastructure NSW? The community has fought long and hard to set up and maintain the environmental laws, yet you want to wipe them off the books so you can create a monstrosity.

You say, “Allow maximum building heights up to RL 156 metres (equivalent to 45 storeys)” This is too high. Presently the site has a 5 storey limit which should be enforced. The shadowing, wind tunnels, lack of overall relationship to the other side of the bay are not considered. The only thing considered in this plan is how to make the maximise profits so the state government can pay for the folly of the new fish markets.

This is public land that you intend to give to a “developer” and change the laws to allow them to overdevelop the site and leave to the City of Sydney and future State governments to build the infrastructure missing from the proposal. The proposed traffic plan is shoddy. Expecting people to walk and cycle – what about the elderly or won’t you expect anyone age in this complex? You want to encourage people to use public transport – but it is totally dependant on the light rail, which already has issues with overcrowding.

The intersection under the ANZAC Bridge flyover (on Pyrmont Bridge Rd) is appalling for cars, people and cyclists but there is no mention of any improvements to that. Every new building brings more people to the area but you seem to see buildings only and not deal to the people who will have to get in and out of them.

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Emily Bullock

3/51 Bay St Glebe

0424234448

168961

Bulluss

Pyrmont 2009

Further to my earlier submission of 15 July, I would like to draw your attention to what appears to be the elephant in the room: proposed changes to planning regulations. Without changes to these, the proposed large Blackwattle Bay towers cannot be constructed. Which begs the question as to what body seemingly arbitrarily came up with an RL figure of 156 metres?

Thank you for your attention to my attached (second) submission on this very important topic.

Ian Bulluss JP
703 / 21 Cadigal Avenue
Pyrmont NSW 2009

2 August 2021

The Honourable Robert Gordon Stokes MP
New South Wales Minister for Planning and Public Spaces
1725 Pittwater Road
MONA VALE NSW 2103

RE: BLACKWATTLE BAY STATE SIGNIFICANT PRECINCT STUDY

Dear Minister,

Further to my letter of the 15th, I would like to draw your attention to what appears to be the root cause of many objections to the proposed development of Blackwattle Bay as detailed in the Blackwattle Bay State Significant Precinct Study (SSPS) as disseminated by your department for public feedback.

The elephant in the room is the current planning regulations. Without changes to these, the proposed large Blackwattle Bay towers cannot be constructed. Which begs the question as to what body seemingly arbitrarily came up with an RL figure of 156 metres?

It appears that the major part of the BBSSPS is dedicated to ensuring that any legislative difficulties with reaching the proposed height, together with the spread of buildings is met with an abundance of reasons. But nowhere is there an explanation as to the source of the building metrics as outlined in Attachment 10.[1]

I am becoming increasingly concerned about the cumulative impacts from several major government projects. All of Sydney's Harbour foreshore has enormous potential, but any proposals for development on public land must not only protect the area but bring clear public benefits. Instead, the community is being disregarded, and asked to accept large redevelopments for maximum developer profits.

When Urban Growth was disbanded, planning for the Bays transferred to Infrastructure NSW (INSW) reporting to the Premier. Community engagement was via membership application to (re)form a Community Reference Group thus diluting the numbers of community representatives. The CRG met several times whereby it received briefings, rather than be engaged in any meaningful discussion on what iNSW was about to propose.

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The next engagement of the CRG was the release of the 3 scenarios for comment in May 2020, when the community was asked to choose between 3 scenarios, in which the building forms presented were largely the same, dominated by 45-storey towers.

Feedback by stakeholder groups demonstrated that community members, including residents, community groups and businesses, suggested buildings with lower heights would be far better able to integrate with the existing built form of Pyrmont and Glebe.

The SSPS states that it is a rezoning proposal which seeks to vary existing planning controls in favour of regulations that support development proposals for the renewal of Blackwattle Bay.

Proposed changes include the amendment of several State Environmental Planning Policies, Sydney Regional Environmental Plans as well as the Sydney Environmental Plan.

The following list 5 specific objections to these changes:

> ***OBJECTION 1****. Amendments to SREP 26 – City West and the Sydney Harbour Catchment SREP;*

SREP 26 and the preceding section (SREP 25) specifically deal with the protection of and enhancement of views and the scenic quality of the foreshore and waterways. Together these sections are designed to ensure that any Blackwattle Bay foreshore development does not impede on the quality of existing waterway views and that any development must enhance those views[23]

The SSPS fails to highlight what changes are envisaged for the existing Fish Market site and only mentions that the new Sydney Fish Market site is to be affected by the repeal of this section.[4] The repeal of this section removes the protection of the views and amenity of the foreshore and thereby allows for zealous overdevelopment.

I strongly object to the proposal to amend the Sydney Local Environment Plan 2012 to allow the maximum building height up to RL 156 and other measures, including re-zoning

> ***OBJECTION 2*** *Allow maximum building heights up to RL 156 metres (equivalent to 45 storeys);*

The SSPS fails to highlight what changes are envisaged to existing controls to enable the development of such large towers.[5] Further, the SSPS fails to offer definitive mechanism whereby these changes may be brought about except to vaguely offer that the changes will be undertaken by either amending the heights shown on a building map or to be included in site specific provision on the site identification map.

Such vague explanation does not give any clear explanation as to why an of RL 156 is stipulated nor which organisation and for what reason this specific number is stated. A

building height of RL 156 is arbitrary at best as it lacks credibility, and potentially reflects a wish by a vested interest party at worst.

> ***OBJECTION 3*** *Specify maximum gross floor areas on a lot by lot basis ranging from 4,675 sqm to 39,100 sqm across the twelve proposed blocks; specify a minimum non-residential gross floor area.*

As per Objection 2 above, the SSPS fails to highlight what changes are envisaged to existing controls to enable the specification of gross floor areas. Attachment 10 to the SSPS gives an overview of what the changes are (including a table of maximum heights and floor space) but fails to offer definitive mechanism(s) whereby these changes may be brought about except to vaguely offer that the changes will be undertaken by either amending the building map or to be included in site specific provision on the site identification map.

Such vague explanation does not give any clear explanation as to why the range of gross floor areas are stated. In failing to offer such explanation, nor which organisation and for what reason the specific number range is stated, the SSPS's stipulated figures are both arbitrary and lacking in credibility. It therefore begs the question, when taken in context with Objection2 above, is the maximum gross floor area to enable vested interest parties access to high level residences with sweeping views across the whole Sydney skyline?

> ***OBJECTION 4*** *introduce a precinct specific design code which will provide detailed design controls, principles for future development in the Precinct and a site specific Design Excellence process*

The inclusion of a provision to disapply the application of clause 6.21(5)-(7) to new development reduces the effectiveness of current regulations that are to protect the pursuits of architectural excellence. Instead, SSPS stipulates that the Design Excellence[6] process will be set out in a yet to be developed Design Code which will be referenced in the LEP.[7]

Further the SSPS seeks to disapply Section 7.20[8] wherein developments require the preparation of a development control plan wherever a development increases the gross floor area especially for buildings that are greater than 55 metres above existing ground level or a development on a site area of greater than 5,000 square metres.

> ***OBJECTION 5*** *introduce a clause requiring the Planning Secretary's approval of any proposed approach to delivery of infrastructure prior to approval of significant development.*

Putting approval power of this magnitude into the hands of only the Planning Secretary opens the process of developmental approval to manipulation by vested interest.

Any large development approval requires a thorough review by an independent panel.

I have deep concerns about the proposal to hand over control of delivery of public infrastructure to the Planning Secretary (Attachment 10, p10-11). Not only is it proposed to exempt planning from any form of independent scrutiny or assessment, but I have little faith in the Secretary's ability to not only identify and fund the infrastructure required to support the influx of residents and workers to the Blackwattle Bay Precinct, but also those associated with developments elsewhere in the Pyrmont Peninsula.

I am also concerned, and indeed skeptical, that the BBSSPS has relied on advice from Treasury, Department of Education, Department of Transport and other Government agencies but that there is no mention of the role of the City of Sydney in this allocation of resources, let alone any mechanism for a seat at the table for community representatives who are best placed to identify both current unmet needs and those which will be required in the future.

In Conclusion.

I urge you to instruct your Department to take a more strategic, meaningful approach to community consultation for all major government projects. The practice of changing state regulations to afford developers and vested interest parties access to streamlined approval avenues for proposed constructions is not only unethical but borders on malfeasance by any public official so engaged.

Variations to state government guidelines and regulations for development proposals is not new. Most notably were the numerous changes that occurred to permit firstly the 3 large towers at Barangaroo south followed by the construction of the Crown Building. Other developments applications where planning regulations were varied in advance of approval may also be cited: Harbourside; One Sydney Harbour; Aspire Tower (Parramatta) Green Square; The Star; et al.

It could easily be inferred that the PPPS reflects instructions given to Infrastructure NSW (iNSW) to incorporate a desired maximum height limit and associated variations to planning regulations to meet covert developer agendas.

INSW is trying to get out of going down the Master Plan[9] route for Blackwattle Bay. It is also trying to get out of any kind of assessment when it comes to the plans for the public parks etc. The Government went to the electorate promising to return planning powers to the people. However, instead iNSW is seeking to remove planning 'obstacles' to enable bizarre extremes of development to become possible. These same planning 'liberties' could

consequently be applied elsewhere, not just in Blackwattle Bay and along the Pyrmont / Ultimo peninsula, but across NSW.

Sydney Lord Mayor, Clover Moore[10] summarised iNSW sleight of hand when she stated:

> "Having seen what is planned for the former Fish Markets site, it appears the redevelopment was a Trojan Horse for large apartment towers designed not with people in mind, but maximum developer profits,"
>
> "Revitalising this area provides us with enormous potential but at the forefront of planning must be the understanding that this is publicly-owned land and its development must bring clear public benefits."

The SFM provides quality assurance and food safety processes for wholesale and retail sale of seafood throughout Sydney and the State. The SFM is much more than a local retailer and will attract many visitors to its cafes/restaurants, thus boosting the coffers of the tourism industry, and the State. I therefore have very real concerns that the proposed development quite dramatically reduces the amenity and value of many residential properties, as well as views from public vantage points, including from Glebe.

NSW Government (INSW and DPIE) is urged to reconsider the maximum height limits and reimagine the Blackwattle Bay Key Site as one which complements and enhances the area and the amenity of the many thousands of residents in Pyrmont, Glebe and beyond.

The Coalition was voted into power with a policy to "return planning powers to the people". Over 10 years there has been a dramatic whittling away of people's ability to influence planning and environmental protection in NSW. Concurrently, there has been a rise in influence of quasi-advisory bodies whose members include representatives of large development companies and others with vested interests in the extraordinary push for so-called "transformation" of places where the citizens of Sydney live, work and play, and in the process substantially reducing the amenity of homes and lives.

Your attention to my concerns is appreciated.

Yours sincerely,

Ian Bulluss JP

CCs.
The Hon. Gladys Berejiklian, NSW Premier
The Hon. Andrew Constance, NSW Minister for Transport and Roads
Alex Greenwich MP (sydney@parliament.nsw.gov.au)
Clover Moore, Lord Mayor of Sydney

ENDNOTES:

[1] Blackwattle Bay State Significant Project Study, Explanation of Intended Effect.

[2] **Section 25 Foreshore and waterways scenic quality**

The matters to be taken into consideration in relation to the maintenance, protection and enhancement of the scenic quality of foreshores and waterways are as follows:

(a) the scale, form, design and siting of any building should be based on an analysis of:

(i) the land on which it is to be erected, and
(ii) the adjoining land, and
(iii) the likely future character of the locality,

(b) development should maintain, protect and enhance the unique visual qualities of Sydney Harbour and its islands, foreshores and tributaries,

(c) the cumulative impact of water-based development should not detract from the character of the waterways and adjoining foreshores.

[3] **Section 26 Maintenance, protection and enhancement of views**

The matters to be taken into consideration in relation to the maintenance, protection and enhancement of views are as follows:

1. (a) development should maintain, protect and enhance views (including night views) to and from Sydney Harbour,
2. (b) development should minimise any adverse impacts on views and vistas to and from public places, landmarks and heritage items,
3. (c) the cumulative impact of development on views should be minimised.

[4] Attachment 10: Explanation of Intended Effect states at *2.14 Proposed amendment to SREP No 26 – City West:*
"It is proposed to repeal SREP 26 as it currently applies to the new Sydney Fish Market site."

[5] Attachment 10: Explanation of Intended Effect states at *2.2 Maximum height and floor space states without explanation that:*

The maximum heights and floor space controls will be stipulated in Sydney LEP by either:

- amending the *Height of Building Map* (Sheets HOB_007 and HOB_008) and *Floor Space Ratio* Map (Sheets FSR_007 and FSR_008), or
- including them in a site-specific provision with the blocks identified on the *Locality and Site Identification Map, Key Sites Map, Foreshore Building Line Map*.

[6] **Sydney Local Environmental Plan 2012 (**Current version for 16 July 2021). Part 7, Division 4, Section 7.20. States:

A ***building demonstrating design excellence*** means a building where the design of the building (or the design of an external alteration to the building) is the winner of a competitive design process and the consent authority is satisfied that the building or alteration exhibits design excellence.

[7] Design Code as per Sydney LRP: **Sydney Local Environmental Plan 2012 (**Current version for 16 July 2021). Part 6, Division 4, Section 6.21. States:

6.21 Design excellence

(1) The objective of this clause is to deliver the highest standard of architectural, urban and landscape design.
(2) This clause applies to development involving the erection of a new building or external alterations to an existing building on land to which this Plan applies.
(3) Development consent must not be granted to development to which this clause applies unless, in the opinion of the consent authority, the proposed development exhibits design excellence.
(4) In considering whether development to which this clause applies exhibits design excellence, the consent authority must have regard to the following matters—
(a) whether a high standard of architectural design, materials and detailing appropriate to the building type and location will be achieved,
(b) whether the form and external appearance of the proposed development will improve the quality and amenity of the public domain,
(c) whether the proposed development detrimentally impacts on view corridors,
(d) how the proposed development addresses the following matters—
(i) the suitability of the land for development,
(ii) the existing and proposed uses and use mix,
(iii) any heritage issues and streetscape constraints,
(iv) the location of any tower proposed, having regard to the need to achieve an acceptable relationship with other towers (existing or proposed) on the same site or on neighbouring sites in terms of separation, setbacks, amenity and urban form,
(v) the bulk, massing and modulation of buildings,
(vi) street frontage heights,
(vii) environmental impacts, such as sustainable design, overshadowing and solar access, visual and acoustic privacy, noise, wind and reflectivity,
(viii) the achievement of the principles of ecologically sustainable development,
(ix) pedestrian, cycle, vehicular and service access and circulation requirements, including the permeability of any pedestrian network,
(x) the impact on, and any proposed improvements to, the public domain,
(xi) the impact on any special character area,
(xii) achieving appropriate interfaces at ground level between the building and the public domain,
(xiii) excellence and integration of landscape design.
(5) Development consent must not be granted to the following development to which this clause applies unless a competitive design process has been held in relation to the proposed development—
(a) development in respect of a building that has, or will have, a height above ground level (existing) greater than—
(i) 55 metres on land in Central Sydney, or
(ii) 25 metres on any other land,
(b) development having a capital investment value of more than $100,000,000,
(c) development in respect of which a development control plan is required to be prepared under clause 7.20,
(d) development for which the applicant has chosen such a process.
(6) A competitive design process is not required under subclause (5) if the consent authority is satisfied that such a process would be unreasonable or unnecessary in the circumstances or that the development—
(a) involves only alterations or additions to an existing building, and

(b) does not significantly increase the height or gross floor area of the building, and
(c) does not have significant adverse impacts on adjoining buildings and the public domain, and
(d) does not significantly alter any aspect of the building when viewed from public places.
(7) A building demonstrating design excellence—
(a) may have a building height that exceeds the maximum height shown for the land on the Height of Buildings Map by an amount, to be determined by the consent authority, of up to 10% of the amount shown on the map, or
(b) is eligible for an amount of additional floor space, to be determined by the consent authority, of up to 10% of—
(i) the amount permitted as a result of the floor space ratio shown for the land on the Floor Space Ratio Map, and
(ii) any accommodation floor space or community infrastructure floor space for which the building is eligible under Division 1 or 2.
(8) Nothing in this clause permits a consent authority to grant development consent to the following development—
(a) development that would result in any building on land projecting higher than any sun access plane that is taken to extend over that land by operation of Division 3, or
(b) development that results in any building causing additional overshadowing of a kind specified in Division 3, or
(c) development that results in any building on land in Area 1 or Area 2 on the Height of Buildings Map having a height greater than the height of the building that was on the land at the commencement of this Plan.

[8] Development consent must not be granted to development to which this clause applies …… unless a development control plan that provides for the matters in subclause (4) has been prepared for the land.

[9] The Bank Street, Pyrmont Master Plan is a 'Master Plan' for the purposes of Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005 and Sydney Local Environmental Plan 2005. Upon its adoption by the Minister, the Master Plan is deemed (under the EP&A Act) to be a DCP that has been made by the Director-General. Accordingly, the Master Plan will continue to be titled a 'Master Plan' as it has been formally exhibited as such. To ensure consistency with the intent of the Environmental Planning and Assessment Amendment (Planning Instruments and Development Consents) Regulation 2005, the Bank Street, Pyrmont Master Plan contains references to the relevant provisions of other relevant DCP's prepared by the Director- General that would otherwise apply to the study area." The Master Plan was formally adopted by the Minister for Planning on 8 September 2006 and accordingly is a relevant planning document that needs to be considered in any assessment of the proposed project.

A summary of feedback on the Draft Masterplan Principles from participants in Workshops in 2017 included participants comments that building heights across the Bays Market District site should reflect existing heights along the Glebe foreshore. "They commented that built form should not overshadow Wentworth Park, and there should be no high-rise development in foreshore areas." Refer SSPS Attachment 13: Masterplanning the Bays Market District: Draft Masterplan Principles Consultation Report 2017.

[10] As told to City Hub (7 July 2021, by Tessa Pelle)

168956

Bulluss

Pyrmont 2009

As a retired school teacher, I have deep concerns with the recently published State Significant Precinct Study â€“ Blackwattle Bay (BBSSPS). In particular, I am greatly concerned that the BBSSPS fails to address the need for accessible School infrastructure that meets both current needs, and the needs of the 8,500 new residents moving to new homes within the Pyrmont Peninsula.

Your attention to my attached submission is appreciated.

703 / 21 Cadigal Avenue
Pyrmont NSW 2009

2 August 2021

The Honourable Robert Gordon Stokes MP
New South Wales Minister for Planning and Public Spaces
1725 Pittwater Road
MONA VALE NSW 2103

RE: BLACKWATTLE BAY STATE SIGNIFICANT PRECINCT STUDY

Dear Minister,

As a retired school teacher, I have deep concerns with the recently published State Significant Precinct Study – Blackwattle Bay (BBSSPS). Attachment 10, p10-11, proposes that control of delivery of public infrastructure is handed to the Planning Secretary. Consequently, it is proposed to exempt planning from any form of independent scrutiny or assessment. I have little faith in the Secretary's ability to identify and fund the infrastructure required to support the influx of residents and workers to the Blackwattle Bay Precinct and indeed elsewhere in the Pyrmont Peninsula.

I am concerned, and indeed skeptical, that the BBSSPS has relied on advice from Treasury, Department of Education, Department of Transport and other Government agencies but that there is no mention of the role of the City of Sydney in this allocation of resources, let alone any mechanism for a seat at the table for community representatives who are best placed to identify both current and future unmet infrastructure needs.

In particular, I am greatly concerned that the BBSSPS fails to address the need for accessible School infrastructure that meets both current needs, and the needs of the 8,500 new residents moving to new homes within the Pyrmont Peninsula.

The only public schools in the area, Ultimo Primary School and the Blackwattle Bay Campus of Sydney Secondary College, are some distance from many parts of Pyrmont, requiring a dedicated school bus to pick up and drop off primary students. In the absence of a local comprehensive secondary school, the nearest Junior Secondary Schools are at Leichhardt and Balmain, not easily accessible by public transport from Pyrmont or Ultimo.

The newly opened Ultimo Public School has this year (2021) about 100 children in kindergarten. In 2028, these students will be entering high school. However, in 2030, when the Blackwattle Bay redevelopment will be complete, these same students together with all those other students in the intervening years will also be moving into the secondary school systems.

The current educational infrastructure is woefully inadequate to cope with this rate of increase in the number of school age children moving into secondary school let alone the number of additional students that will be resident in Blackwattle Bay.

The BBSSPS states that:

> "A primary school is not proposed within the Study Area. Schools Infrastructure have advised that there is no requirement for a public school to service future development. The local primary school appears to have capacity for enrolments resulting from renewal in accordance with the Precinct Plan. However, it may not be within a walking catchment for the entire Study Area. "

And further that:

> "A secondary school is not proposed in the Study Area. NSW Department of Education has indicated that there is not a requirement for a new high school."

This is despite the local school indicating that there is no capacity for out of area enrolments, suggesting that capacity is an issue. With the proposed number of residents to be shoe-horned into the study area, the provision of future educational facilities both primary and secondary should be considered further as part of the PPPS implementation.

Your attention to my concerns is appreciated.

Yours sincerely,

H Bulluss

Hilary Bulluss

163786

Bulluss

Pyrmont 2009

Planning for the redevelopment of Blackwattle Bay and the associated foreshores has been underway for nearing 20 years. Stop-start community engagement has always been a part of this planning with periodic invitations to community â€œeventsâ€ to canvas public opinions and discussion along the way.

Several members of varying Pyrmont/Ultimo community groups have alerted me to, what is no doubt across many community concerns, that prior representation to planning discussions have failed to materialise into a holistic approach to this valuable foreshore asset.

Members of these community groups had envisaged that any Bays Precinct development would at a minimum include an urban park with open space with passive boating facilities together with a limitation on the construction of residential towers; they are therefore specifically apprehensive of the planned construction of 12 buildings varying in height between 21 metres and 156 metres (up to 45 storeys) with the potential for 1550 dwellings.

The attached offers my supporting commentary on several of the concerns raised within the Pyrmont/Ultimo community on the Blackwattle Bay State Significant Precinct Study.

Ian Bulluss JP
703 / 21 Cadigal Avenue
Pyrmont NSW 2009

15 July 2021

The Honourable Robert Gordon Stokes MP
New South Wales Minister for Planning and Public Spaces
1725 Pittwater Road
MONA VALE NSW 2103

RE: BLACKWATTLE BAY STATE SIGNIFICANT PRECINCT STUDY

Dear Minister,

Thank you for your department's invitation to submit comment on the Blackwattle Bay State Significant Precinct Study.

Pyrmont/Ultimo community groups have long participated in planning for the foreshores of waterways into which the Pyrmont peninsula protrudes. Of specific interest to these groups is any planning for Bank Street inclusive of the Sydney Fish Markets.

Several members of varying Pyrmont/Ultimo community groups have alerted me to, what is no doubt across many community concerns, that prior representation to planning discussions have failed to materialise into a holistic approach to this valuable foreshore asset.

Members of these community groups had envisaged that any Bays Precinct development would at a minimum include an urban park with open space with passive boating facilities together with a limitation on the construction of residential towers; they are therefore specifically concerned at the proposed construction of 12 buildings varying in height between 21 metres and 156 metres (up to 45 storeys) with the potential for 1550 dwellings on the existing Fish Market site (once vacated) on roughly 5.4 hectares) - large apartment towers seemingly designed not with people in mind, but maximum developer profits.

Pyrmont is already a densely populated area. Any new development must be sensitive and prioritise both recreational and employment growth. Instead, the plans outline significant towers, with bulk and scale, to be built adjacent to Blackwattle Bay foreshore.

In 1996 Lend Lease acquired the 11 hectare old Colonial Sugar Refinery (CSR) industrial complex at the northern end of the Pyrmont Peninsula and renamed it "Jacksons Landing"[1] with plans to construct a high-rise, upmarket residential complex of apartments and parks. Today the Jacksons Landing community consists of 2500 residents in more than 1300 apartments, terraces and townhouses.

• Phone: 0413 889 240 • E-Mail: ianbulluss@bigpond.com

In comparison (Table 1), the Jacksons Landing high-rise buildings are limited in height and levels that are all less than the proposed height of the Blackwattle Bay towers.

Any commentary that suggests that Pyrmont is already populated by excessively high-rise buildings has failed to examine these statistics[2] and compare them to what is being proposed:

TABLE 1	**Jacksons Landing**	**Blackwattle Bay**
Land area (ha)	11	5.4
Dwellings	1,388	1,550
Population	2,500	2,850
Max Building Height (m)	75	156
Max number of floors	24	45
Density (resident/ha)	227	527

Planning for the redevelopment of Blackwattle Bay and the associated foreshores has been underway for nearing 20 years. Stop-start community engagement has always been a part of this planning with periodic invitations to community “events” to canvas public opinions and discussion along the way. As with past consultative engagements, the community could be forgiven for thinking that these consultations were exercises in “ticking the box” and were not really intended to engage with community concerns!

The area was first designated as a future apartment, employment and dining hub in 2013. A Department of Planning, Industry and Environment then spokeswoman said plans for Blackwattle Bay and the Sydney Metro West would be undertaken at the same time as the Pyrmont plan, to "ensure all of the plans and projects on the peninsula are unified into a cohesive strategy".

Infrastructure NSW promotes in the study how it undertook a community-centred approach to engagement about future uses and planning for the Blackwattle Bay precinct. The study lists 12 engagement activities:

> November 2014 - The Bays Precinct International Summit
> April 2015 - The Bays Precinct Discovery Day
> May 2015 - The Bays Precinct Sydneysiders Summit and Leadership Forums
> May to July 2015 - Transforming City Living and The Bays Precinct Discussion Papers exhibited
> May to July 2015 - A ‘Call for Great Ideas’ process was run in parallel to the exhibitions
> October 2015 - The program of consultation resulted in the publication of The Transformation Plan: The Bays Precinct, Sydney
> December 2015 to 2020 - The Bays Precinct Reference Group launched comprising 41 organisations representing industry, community and peak bodies with interests in the area.
> 2015 – 2017 - Schools and university engagement
> 2016 – 2018 - Open houses

August 2017 - Public consultation commenced on the principles to guide the precinct planning
October/November 2019 - Four public information drop-in sessions were held on the design for the new Sydney Fish Market.
May/June 2020 - Consultation for shaping the Blackwattle Bay Precinct Plan commenced with three scenarios illustrating potential future urban renewal based on different elements.

A summary of feedback on the Draft Masterplan Principles from participants in Workshops in 2017 included participants comments that building heights across the Bays Market District site should reflect existing heights along the Glebe foreshore. “They commented that built form should not overshadow Wentworth Park, and there should be no high-rise development in foreshore areas.” Refer SSPS Attachment 13: Masterplanning the Bays Market District: Draft Masterplan Principles Consultation Report 2017.

SSPS Attachment 13 also states, ”Specifically, the height and scale of the built form should reflect the waterfront nature of the precinct and traditional low rise architecture and heritage character of surrounding localities.”

It is therefore alarming that throughout all this consultation over many years, the recommendations of the community NOT to have high rise buildings dominate the Blackwattle Bay area, together with the inclusion of a similar recommendations in the study’s attachments, have been ignored

In 2020, the government consulted the public on three “precinct plan scenarios” that would shape the revamping of Blackwattle Bay. However, the Blackwattle Bay State Significant Precinct Study seeks to amend the planning controls for the roughly 5.4 hectare area to allow the redevelopment.

There have been several noteworthy recent comments made by local community leaders. These include:

1. Independent Sydney MP Alex Greenwich who said that most Sydneysiders would be “speechless” at the height of the buildings and urged the government to go back to the drawing board:

   > “The plans are ignorant to the needs of a global city. They fail to address the urgent need for social and affordable housing, and the need for public open space. What this seeks to do is privatise our harbour foreshore.”[3]

2. City of Sydney lord mayor Clover Moore said the proposed redevelopment appeared to be

   > “… a Trojan Horse for large apartment towers designed not with people in mind, but maximum developer profits”[4]

3. Pyrmont Action residents’ group convenor Elizabeth Elenius said the group had consistently opposed the height of the towers, which she said would have a “humungous impact” and create “a wall of high-rise buildings”.

> “We’d be happy for it to be developed at an intermediate scale between the CBD and Glebe, we don’t want to see it as an extension of the CBD.”

The Blackwattle Bay SSPS 225-page document has in excess of 50 attachments that examine specific concerns and planning issues needing to be addressed. This is a very weighty tome of material to digest for the average member of the public. Many of these documents offer solutions/conclusion that support the proposed development without addressing the obvious; the heights of proposed residential towers to accommodate in excess of 1500 apartments.

Specific Areas of Community Concern (inter alia).

Building height and congestion.

The current schematics suggest that visually there will be a wall of buildings confronting residents and visitors to the Blackwattle Bay foreshore. But community consultations undertaken by Infrastructure NSW et al, failed to outline, let alone address, the matter of high-rise building being constructed within the foreshore of Blackwattle Bay.

A recent edition of the City Hub[5] interviewed Elizabeth Elenius who is quoted as saying that the redevelopment “pulled the rug out from under us.” “I’m on the community reference group [for the Bays Precinct] and at no stage in any of the discussions we’ve had has the prospect of 45 storey towers been raised so when the three scenarios came out, we were shocked. There’s been no community input into the height of the buildings. We got the report of the scenario so-called consultation, but they didn’t take into account any of the qualitative remarks you could put in.”

Similarly, the “Hands off Glebe” community spokesperson, Denis Doherty, is quoted as saying that he is disappointed with how community concerns have been addressed.[6]

> “It’s not so much a lack of consultation, it’s the way in which the consultation happened. It’s more in the way of persuading rather than listening to the community. They try to manipulate and smooch up to people rather than consulting and seeing what’s good for the community and the suburb.”

The proposed development expects to create a mix of residential and commercial properties with approximately 5,000 employment opportunities alongside 1500 residential apartments. “Whereas there was a chance for the harbourside area to be a free and open space and for people to have a walkway along it, and then the government goes and whacks a dirty big building in it,” said Denis Doherty.

In the same article, Lord Mayor Moore told City Hub “Having seen what is planned for the former Fish Markets site, it appears the redevelopment was a Trojan Horse for

large apartment towers designed not with people in mind, but maximum developer profits," Lord Mayor Moore told City Hub (7 July 2021, Tessa Pelle):

> "Revitalising this area provides us with enormous potential but at the forefront of planning must be the understanding that this is publicly-owned land and its development must bring clear public benefits."

Overshadowing

The current schematics of the proposed buildings raise concerns about the shadow effect of the buildings. The SSPS only slightly addresses this concern through the principle "Minimise additional shadowing to Wentworth Park and Glebe Foreshore (in mid-winter) and create new places with comfortable conditions for people to enjoy". However, on examination of the proposed plans it is obvious that a significant shadowing effect will fall across a large parts of the broader Blackwattle Bay area including parks, foreshore, existing residential buildings and the New Sydney Fish Market site.

Lord Mayor Clover Moore is quoted as saying that we are to "…. have large Barangaroo-style towers built adjacent to eight-lanes of free-flowing traffic, with bulk and scale right up to the foreshore. It will even overshadow the future Fish Market's solar panel roof!"

Traffic Flow

The focus of the SSPS Attachment 4: AECOM's "Transport Management and Accessibility Plan", is predicated on the development and implementation of enablers to support delivery of the Blackwattle Bay Precinct Plan principles. The AECOM report acknowledges the significant movement of people through the SSPS area and goes on to highlight that, to mitigate future congestion in the Blackwattle Bay SSPS area, substantial investment is required in public transport, cycling and walking pathways, and very effective policies and strategies to influence travel behaviour.

Schools

As a part of SSPS Attachment 4: AECOM's "Transport Management and Accessibility Plan", Travel Demand Management measures are required that are suitable for businesses, educational facilities and communities to manage travel demand and promote sustainable travel in Blackwattle Bay.

However the report states that:

> "A primary school is not proposed within the Study Area. Schools Infrastructure have advised that there is no requirement for a public school to service future development. The local primary school appears to have capacity for enrolments

> resulting from renewal in accordance with the Precinct Plan. However, it may not be within a walking catchment for the entire Study Area. “

And further that:

> “A secondary school is not proposed in the Study Area. NSW Department of Education has indicated that there is not a requirement for a new high school.

This is despite the local school indicating that there is no capacity for out of area enrolments, suggesting that capacity is an issue. With the proposed number of residents to be shoe-horned into the study area, the provision of future educational facilities both primary and secondary should be considered further as part of the PPPS implementation.

Public transport [7]

The study makes mention of the existing Light Rail but fails to fully examine that this mode of transport is already heavily congested in peak times and fails to fully address the proposed new Metro Station in Pyrmont is a 15min walking distance uphill from the new Fish Market site and the proposed high-rise development for in excess of 2,500 residents.

Whereas a ferry was proposed in early studies, recent announcements have dismissed any implementation of a public ferry wharf. This is extremely disappointing. With affirmative action to discourage the use of private vehicles for both residents and visitors, the traffic management plan fails to take into account the significant numbers of surrounding Sydneysiders who frequent the fish market, especially at the peak times of Easter and Christmas

Emergency services access

The current schematics of roadworks failed to take into account the need for emergency services access to the study area. In the event of an emergency (fire, etc) the congested streets and multiple shared zones will not be able to support the access of “snorkel” fire equipment in the event of a 175m tall towering inferno!

Architectural excellence / visual inspiration [8]

The current schematics do not allow for comment on what “boxes” are to be built. One can only hope that leading architectural designs are incorporated and that the boring architecture that dominates much of Sydney’s skyline are not repeated as part of a developer’s greed.

Wind tunnels

Any combination of tall buildings built on a waterfront, especially with narrow corridors between each building, will through the simple science of air movement, create wind tunnels that detract from the amenity and resident enjoyment of the area.

Accessibility for the disabled

This needs a separate paper. Not all residents of the proposed development will be able to cycle, walk or even catch public transport. It is suggested that there will be several disabled residents that will rely of vehicular traffic (whether community transport groups, or disability services) to get around. This will require the provision of carefully considered accessibility measures inclusive of on-street disabled parking.

In Conclusion

Community/stakeholder groups seek assurances that the current Government, through the Dept Planning and Public Spaces, is committed to not only honouring the terms of the 2005 Bank Street Pyrmont Master Plan[9] as approved by the then Minister for Transport, Frank Sartor in 2006, but a willingness to work with the City of Sydney and community stakeholders, to expedite the re-development of a plan that includes increased provision of public passive and active recreation facilities. And that this cooperative engagement will re-assess the current plans for the development of high-rise buildings along the foreshore of Blackwattle Bay.

I would like to make it clear that I have no pecuniary interest in any of the proposed developments of Blackwattle Bay including the new Sydney Fish Market nor any residential, commercial or industrial development that might be placed on the current Fish Market site.

Your attention to this submission is appreciated.

Yours sincerely,

Ian Bulluss JP

CCs.
The Hon. Gladys Berejiklian, NSW Premier
The Hon. Andrew Constance, NSW Minister for Transport and Roads
Alex Greenwich MP (sydney@parliament.nsw.gov.au)
Clover Moore, Lord Mayor of Sydney

ENDNOTES:

[1] Jacksons Landing was so named by Lend Lease Pty Ltd after the architect Jackson Dyke (of Daryl Jackson Robin Dyke Pty Ltd that designed the original building, The Elizabeth (opened in 2000). Construction commenced on the estate in late 1990's following the acquisition of the Colonial Sugar Refinery (CSR) factory site in 1996. The Jacksons Landing residential area is situated on 11 hectares and comprises 1388 dwellings across 25 buildings and stratas.

[2] *Jacksons Landing Residential Strata Statistics (in descending height order)*

#	SP	Building Name	# of (lots) apartments	Height (m)	Levels
1	SP 86806	Silk	100	75	24
2	SP 73528	Distillery Hill & Quarry	214	74	19
3	SP 82306	Stonecutters	107	70	19
4	SP 84689	Sugar Dock	132	65	20
5	SP 69581	McCafferys (inc. Tower, John St, Chalet, Mews, Stables & Cliftop	158	58	18
6	SP 62660	Regatta (inc. Solander, Edgewater, Watercrest & Eventide)	146	54	15
7	SP 80937	Evolve	46	46	14
8	SP 62661	Elizabeth	44	36	10
9	SP 65564	Fleetview	150	36	10
10	SP 68839	Reflections (inc. Clearwater & Bridgeview)	78	36	10
11	SP 76418	Knox on Bowman	24	22	6
12	SP 63595	Rum Store	13	18	5
13	SP 72677	Escarpment	20	18	5
14	SP 75963	Cooperage	40	15	4
15	SP 86684	Antias	43	15	4
16	SP 63466	Mount St Walk Terraces	38	11	3
17	SP 62406	Cadigal Ave Terraces	25	11	3
18	SP 73749	Tablet House	3	11	3
19	Terrace bld.	54 John St, Pyrmont	1	7	2
20	Terrace bld.	56 John St, Pyrmont	1	7	2
21	Terrace bld.	58 John St, Pyrmont	1	7	2
22	Terrace bld.	60 John St, Pyrmont	1	7	2
23	Terrace bld.	62 John St, Pyrmont	1	7	2
24	Terrace bld.	64 John St, Pyrmont	1	7	2
25	Terrace bld.	66 John St, Pyrmont	1	7	2

[3] **Blackwattle Scheme**. Alex Grenwich MP. 6 /7/ 2021.

https://www.alexgreenwich.com/blackwattle_scheme

The government has released proposed new planning controls for the existing Sydney Fish Market and claims it has listened to the community by allocating a mix of residential and commercial space. But people would be speechless at the wall of towers along the harbour with heights reaching 45 storeys, overshadowing the public foreshore and blocking the water from the rest of Pyrmont – exactly what the community has long opposed. Only five percent of the 1,550 proposed dwellings are

earmarked as affordable when the government owns this land and must address the growing housing affordability crisis.

The proposal represents privatisation of the harbour and has little public benefit.

But people would be speechless at the wall of towers along the harbour with heights reaching 45 storeys, overshadowing the public foreshore and blocking the water from the rest of Pyrmont – exactly what the community has long opposed. Only five percent of the 1,550 proposed dwellings are earmarked as affordable when the government owns this land and must address the growing housing affordability crisis.

[4] https://www.dailytelegraph.com.au%2Fnews%2Fnsw%2Fblackwattle-bay-plan-a-trojan-horse-for-developer-profit-clover-moore-says
"This is already a densely-populated area, with limited space – any new development should be sensitive and prioritise employment growth. Instead, we have large towers built adjacent to eight-lanes of free-flowing traffic, with such bulk and scale right up to the foreshore as to recast the whole area as an imposing shadowland."

Cr Moore said the towers would "even overshadow the future Fish Market's solar panel roof".

[5] City Hub, 7 July 2021, reporter Tessa Pelle provided commentary on the issues of community consultation and proposed building heights.

[6] Hands Off Glebe (http://www.handsoffglebe.org) is against overdevelopment and high-rise in Glebe. · For decent public housing in Glebe. · For preserving the historic townscape and protecting the low-income community of Glebe

[7] Megan Gorrey, Sydney Morning Herald 2/7/2021. 'Wall of high-rise buildings': Plans for 45-storey towers at Blackwattle Bay

[8] Transport Management and Accessibility Plan, AECOM June 2021; SSPS Attachment 4 - pg 156
The road network surrounding the Blackwattle Bay SSP Study Area is congested and highly constrained. Current travel behaviour suggests that the road network would need to accommodate a third of future trips generated by Blackwattle Bay in peak periods

To encourage walking, cycling and use of public transport and to discourage private vehicle trips, 'Travel Demand Management' measures are discussed with the aim of managing travel demand and promote sustainable travel in Blackwattle Bay. Whereas the measures focus on policy and travel interventions they fail to discuss the primary cause of the (future) congestion – the number and size of the proposed development of Blackwattle Bay.

SSPS Attachment 15 – Visual Impact Assessment (Clouston Associates, June 2021). Pg 117
The study of the impact on the visual amenity within the greater Blackwattle Bay / Pyrmont / Ultimo area concludes that nearly half of all impacts fall in the moderate to high category with the most significant public spaces that will be affected by the precinct being in close proximity to the development such as the foreshore walk

[9] The Bank Street, Pyrmont Master Plan is a 'Master Plan' for the purposes of Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005 and Sydney Local Environmental Plan 2005. Upon its adoption by the Minister, the Master Plan is deemed (under the EP&A Act) to be a DCP that has been made by the Director-General. Accordingly, the Master Plan will continue to be titled a 'Master Plan' as it has been formally exhibited as such. To ensure consistency with the intent of the Environmental Planning and Assessment Amendment (Planning Instruments and Development Consents) Regulation 2005, the Bank Street, Pyrmont Master Plan contains references to the relevant provisions of other relevant DCP's prepared by the Director- General that would otherwise apply to the study area." The Master Plan was formally adopted by the Minister for Planning on 8 September 2006 and accordingly is a relevant planning document that needs to be considered in any assessment of the proposed project.

182861

Cashmore

Glebe 2037

Please find attached a submission objecting to the Blackwattle Bay State Significant Precinct Study from Save Our Bays.

President, SOBS

Dr Judy Cashmore AO

28/501 Glebe Point Road

Glebe 2037

PO Box 181
Glebe, NSW, 2037
Australia
saveourbaysglebe@bigpond.com

Department of Planning, Industry and Environment
Blackwattle Bay Submission,
Locked Bag 5022,
Parramatta NSW 2124
planning.nsw.gov.au/blackwattle Bay
20 August 2021

Dear Sir/Madam

Re: Blackwattle Bay State Significant Precinct Study.

Save Our Bays Inc objects strongly to the Blackwattle Bay State Significant Precinct Study and strongly supports the very thorough points of objection, the proposed principles and all the recommendations of the Glebe Society in its submission.

The redevelopment of the site of the current fish market is critical to this area of Sydney, to the overall bays area and the whole of the waterfront at Blackwattle Bay. None of the proposed rezoning or details in the study will achieve an acceptable plan for public access to the waterfront, adequate greenspace and an innovative attractive area for Sydney residents. It is well past time to provide for public benefit over private wealth and short-term interests.

The document correctly identifies Blackwattle Bay as:

> *an extraordinary opportunity to reconnect the harbour, its surrounding neighbourhoods and the city; to showcase Sydney's living culture and stories of Country; to build an inclusive and iconic waterfront destination that celebrates innovation, diversity and community.*
> (Blackwattle Bay State Significant Project Study, page 1)

The Plan clearly fails that vision.

As the Glebe Society pointed out:
"The land in question is public land, but we believe that not only does it not deliver any public good, the plans, if delivered, would be detrimental to the site, to the precinct, to Blackwattle Bay and to Glebe."

The Glebe Society believes the proposal is a massive overdevelopment of the site, takes no account of the changes already and likely to be wrought by covid-19, and is totally unresponsive to community considerations or the fact that this is public land. It is not land that should once again be traded away to developers to promote private interests and ownership and create yet another high-rise soulless area of Sydney. This is a city that is frittering away its beauty and environment for the sake of the $$.

The main points of objection concern:

- The lack of an overall master plan
- the lack of community consultation
- the lack of imagination
- the lack of public good
- the loss of amenity, solar access and useable attractive public space
- the inadequacy of foreshore access *
- the inadequate provision of affordable and public housing
- the massive overdevelopment and height of the buildings and fit with the local environment
- the lack of consideration of recreational water users

To highlight several issues:

- We fully support the Glebe Society's recommendations and in particular, recommendation 3 that:

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. Buildings should also conform to sustainable building standards.

High-density housing development will 'monster' the foreshore and overwhelm local infrastructure. It will further alienate local residents and Sydney residents and visitors from the liveability of the local environment and the bays and natural environment.

The proposal would allow up to 1,550 apartments 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 overshadow public space and cast shade over the solar panels on the new Sydney Fish Market development. This project does not 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.

- **Secondly: The plan does not deliver an adequate useable foreshore walk** congruent with the walk along Johnstons Bay and around the Glebe foreshore. It is far too narrow. It would be overshadowed by the buildings and windy. It cannot accommodate the number of people who would use it, including pedestrians, shoppers and tourists milling about, cyclists, parents pushing strollers, wheelchair users and people walking dogs.

As we have learnt during lockdown, foreshore walks such as the Glebe foreshore walkway, are heavily used and shared spaces with pedestrians, dogs and cyclists do not work well and can be unsafe.

The foreshore walk should be 30 metres wide, with separate paths for pedestrians and cyclists. Adequate seating must be provided.

Tree plantings must have adequate sunlight to grow and be protected from damaging winds.

- **Thirdly, the 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.

- **Fourthly, the 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.

We do not need more 'glorified shopping precincts with private restaurants and businesses given prime foreshore positioning at the expense of public access'.

- **Fifth, SOBS fully supports Glebe Society's recommendation 10** for proper planning and rethinking and being open to the changes wrought by covid and climate change and the need for sustainable living and open spaces.

The proposed Blackwattle Bay development, along with the new Fish Market, risks falling victim to the Covid pandemic, adding to the oversupply of vacant residential and office space in the CBD, and financial stress for the developer.

RECOMMENDATION 10: INSW should engage independent consultants to put together a report on the projected impact of Covid and tensions with China on longer term demand for housing and commercial space in the area.

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 'take' from existing residential property nearby who will be lose sunlight and views, in an unfair transfer of wealth to developers and new owners – all by sleight of hand via 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.

Yours sincerely
President, Save Our Bays Inc
Judith Cashmore AO

saveourbaysglebe@bigpond.com

judycash@bigpond.net au

178226

Chezzi

BALMAIN 2041

Please see document attached

17 August 2021

To whom it may concern,

Blackwattle Bay State Significant Precinct (SSP) Study

On behalf of the Pacific Dragons Dragon Boat and Outrigger Canoe Club, I would like to thank the Infrastructure NSW team for their communication and inclusion in the development of this Precinct Plan. I have been fortunate to be a member of the Blackwattle Bay Community Reference Group and can appreciate the hard work that went into the document.

Pacific Dragons is an affiliate founding member club of Dragon Boats NSW (DBNSW) and is also an affiliate member of Australian Outrigger Canoe Racing Association (AOCRA) and Paddle NSW.

It should be noted that Pacific Dragons fully supports the submission from DBNSW on the above-mentioned SSP Study. Like DBNSW, Pacific Dragons supports the revitalisation and the rehabilitation of The Bays and is strongly advocating for a permanent home for the sport and recreational activity of Dragon Boating within the Bank Street Open Space and bay area.

As a club that also facilitates outrigger canoeing and other water sports, we envisage this space to be critical to the recreational water sport community. There is little to no space in inner Sydney or on Sydney Harbour for clubs such as ours to safely store all of our canoes and easily launch into the water. Opportunities for storage of single watercrafts both club owned and private are hard to come by.

The NSW Government now has the opportunity to have a world class water sport hub on the famous and iconic Sydney Harbour that is available for the whole community.

Importance of Bank Street:
The site of 1-3 Bank Street has been the home of some of DBNSW's Premier Clubs along with the State and National Teams for nearly 20-years. Pacific Dragons have over 100 members who use the Bank St site for Dragon Boating three times a week at club sessions, as well as members who represent dragon boating at both a State and National level, training at the site for those purposes regularly. Pacific Dragons also have outrigger canoes that utilise the Bays precinct from Glebe Foreshore three to four times a week. Currently Pacific Dragons have many six man canoes that do not have a permanent, safe and secure home.

Pacific Dragons would support this opportunity for DBNSW and other water sport clubs to have a permanent home, where boats can be stored safely and close to easy, accessible launching facilities. Additionally, simple amenities such as change rooms, showers and toilets that can be used by all. The Pacific Dragons has both junior and senior members and we feel that the additional accessibility of these amenities will bring another level of safety for our members.

Positive Outcomes from the SSP:

- Pacific Dragons sees the proposed safe and secure undercover storage location for Dragon Boats and other paddling sports as outlined in the study as a positive result for the redesign of the Bank Street Open Space. Pacific Dragons is a strong supporter of this initiative and

believe the proposed location and design scope is fitting to not only the needs for DBNSW and their members, but the whole community.

- Pacific Dragons is extremely encouraged by the potential opportunities to utilise the existing buildings at 1-3 Bank Street as a potential home for Dragon Boating and other community water based activities or organisations. Given the close proximity to the water, we believe the redesign of 1-3 Bank Street should be a multi-use space and include storage for equipment as well as toilets, changerooms and showers. We would welcome the opportunity for this location to be a club house and permanent home for DBNSW.
- The topography of the entire site and location on the harbour provides a fantastic opportunity to ensure water sports on Sydney Harbour are accessible to those of all mobilities in the community. Of note, access to the launch ramp from the proposed boat storage facilities ensures safe and easy access to the water which is a critical win from the study.

SSP Omissions:

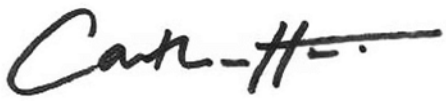
- While we understand the position, the study has taken regarding parking, we ask the NSW Government to re-look at the needs for the area and allow for suitable parking to the area for vehicles, especially with regard to accessing the Bank Street Open Space. We would also welcome the inclusion of secure bicycle, scooter and motorcycle parking.
- Loading/unloading areas must be incorporated into the design of the Bank Street Open Space to allow for large and long vehicles to access the storage area for Dragon Boats to ensure safe loading and unloading of boats and equipment.
- The study does not appropriately address the need for adequate lighting or security to the area for users who use the area outside of daylight hours. This is particularly important as paddling, dragon boat or other, is predominately outside of daylight hours in winter.
- The relocation of the 15 DBNSW clubs during construction has not been addressed or discussed.

We believe the housing of Dragon Boating and other water sports is complimentary to the vision of the development as it is a sport and recreational activity that has the ability to offer an extraordinary opportunity to reconnect the harbour, its surrounding neighbourhoods, and the city.

In regards to the above-mentioned points, it would be beneficial to all DBNSW and water sport club members that discussions continue for the development of the concept plan and its eventual construction. It is important to ensure that the end product is user friendly and meets the needs of all of the community.

Should you require any further clarifications, please do not hesitate to contact me at caitlinmoffat@gmail.com.

Kind regards,



Caitlin Moffat
President
Pacific Dragons Dragon Boat and Outrigger Canoe Club

168741

Cohen

Glebe

I am deeply concerned by the proposals for the Blackwattle Bay redevelopment. I have always supported the move over recent decades to reclaim the Harbour foreshores, in order to prevent exactly the scenario which is now foreshadowed.

LIGHT & SHADE

One of the most horrible aspects of the proposed development is the inevitable reduction of natural light over the Bay, due the extraordinary proposition of having 45 storey buildings dwarfing the waterfront. Information has been given about forecast shadowing over the water between 9am and 3pm on 21 June. The 8.30 am shadowing is already horrible and we have no proper information about sunrise to 8.30 am or the situation at other times of the year. That said, to have the vast congregation of buildings crammed between the expressway and the water with the attendant vast increase in population is a daunting thought.

TRANSPORT

The justifications given for how the population will be transported are, frankly, laughable.

The reliance on public transport and bicycles is not realistic. The quoted bus routes of 431, 433 and 370 are nowhere near the area. The light rail has limited capacity. The introduction of a metro station at least 500m away is not much use for people with less mobility. People will use cars, adding to the already horrendous peak hour traffic problems in the area.

PARKING

The principle of only providing minimal parking seems to me to be to be a recipe for disaster. To use as an excuse that not providing adequate parking for the apartments is a deliberate attempt to save people money when purchasing is also laughable. People donâ€™t need to have that decision made for them. The street parking in all inner suburbs is always at a premium: what is a person with a car who purchases one of these units supposed to do?

ABORIGINAL HERITAGE

I thought the Indigenous representatives at the Webinar did a brave job of trying to justify how the proposed development had taken Indigenous wishes for the area into account â€“ essentially that the concessions that had been made for them made the area no worse than it already is. I canâ€™t truly imagine that they are thrilled with what is happening to their beloved land adjoining the water.

PLEASE SUBMIT A REDEVELOPMENT PLAN WHICH RESPECTS THE SYDNEY POPULATION.

GERTRAUD COHEN
PO Box 169
Glebe NSW 2037
Australia

1 August 2021

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168736

Cohen

Glebe

1 August 2021

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PLEASE SUBMIT A REDEVELOPMENT PLAN WHICH RESPECTS THE SYDNEY POPULATION.

Dr RICHARD S. COHEN
PO Box 169
Glebe NSW 2037
Australia

1 August 2021

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PLEASE SUBMIT A REDEVELOPMENT PLAN WHICH RESPECTS THE SYDNEY POPULATION.

183146

Conlon

Sydney

Please See attached

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20/08/2021

Jim Betts
Secretary
Department of Planning, Industry and Environment
Sydney NSW 2000
Australia
Email: eastern.harbourcity@planning.nsw.gov.au

Dear Mr Betts

SUBMISSION TO THE BLACKWATTLE BAY STATE SIGNIFICANT PRECINCT STUDY

1. INTRODUCTION

This submission is made by Broadway Sydney (Broadway). Broadway is jointly owned by Mirvac Group and Perron Group, two of Australia's leading property groups and owners and managers of numerous contemporary retail centres.

This submission responds to the Blackwattle Bay State Significant Precinct Study (SSPS) and the supporting technical studies which is currently on exhibition until 20th August 2021.

In addition to the below, Dominic Hunt (Project Director, New Business) is making a submission on behalf of Mirvac Ltd.

2. SUPPORT

Broadway is supportive of the objectives and intended outcome of the Blackwattle Bay SSPS, which seek to set out the proposed planning controls for the Blackwattle Bay Precinct and encourage approximately 5,600 new jobs, 2,800 residents and 1,550 new dwellings. Broadway is specifically supportive of the provision of new active transport connections and improved public transport options and minimisation of vehicle usage strategies such as:

- Minimising non-residential car parking spaces with limited on-street parking;
- A new ferry wharf;
- Bus through site linkages;
- Connections to the existing light rail; and
- Access to the future Sydney Metro West Station in Pyrmont.

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In particular Broadway supports for non- residential environments:

- a targeted mode share of 80% sustainable transport and 20% vehicles with a more ambitious mode stretch target of 85% sustainable transport and 15% vehicles; and
- the proposed restriction on the number of car parking spaces that will be able to be provided through the changes to the categories of non-residential maximum parking rates on the Sydney LEP Land Use and Transport Integration Map (LUIM) and the Public Transport Accessibility Level Map (PTAL).

3. COMMENT

Broadway would however like to make the following comments regarding the Economic Development, Local Retail and Services Report that has been undertaken by Hill PDS and the non-residential floorspace controls that are set out in the Explanation of Intended Effect, the draft Design Code and the SSPS report itself.

- It does not appear that the proposed minimum non-residential gross floor areas for each Block, which equates to 111,225 m^2 in total across the Blackwattle precinct, has any specific maximum floor space controls for retail land uses. Whilst a site-specific provision is proposed, that is designed to ensure commercial floorspace is prioritised within the Precinct, the term non-residential includes office, retail community and cultural uses and as such it is considered that there should be a maximum cap on the amount of retail floorspace provided within the site-specific controls or within the proposed Design Code. This is especially pertinent, given the Economic Development, Local Retail and Services Report quantifies that there is only demand for a maximum 10,500m^2 of retail floorspace which would serve residents and workers within an 800m walkable catchment and is not intended to directly compete with the higher order surrounding retail centres.

- The Economic Development, Local Retail and Services Report, explicitly states that the retail potential on the Blackwattle Bay site has not included the new Sydney Fish Market as *it "is being independently analysed and is subject to a separate proposal "*. However, as set out in Mirvac's submission on the new Fish Market Concept and Stage 1 Development Application (DA) (SSD 8924) and its submission to the Fish Markets Stage 2 DA (SSD 8925), the EIS and technical supporting documentation that was submitted with those applications did not provide any economic justification for the provision of the proposed quantum of retail floorspace and did not assess the potential impact of the proposed retail floorspace on the surrounding retail hierarchy.

  Accordingly, whilst it is acknowledged that the approvals for the new Sydney Fish Market development have been granted, given the new Fish Market is included within the Blackwattle Bay SSPS area, the economic and retail assessment should provide a detailed economic justification, qualitative and quantitative assessment of the cumulative impacts of providing the total quantum of retail floorspace within the Precinct and justify the role that the Precinct retail and new Fish Markets retail play within the context of the existing retail hierarchy. It is considered that the Economic Development, Local Retail and Services Report that has been provided does not consider any of these issues. We would expect that this economic justification should be considered and provided as this project progresses through the approval phases.

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- The Land Use objective (b) provided within the draft Design Code requires development to "create opportunities for a range of complementary active uses on the ground level – such as food and beverage, outdoor dining and retail – that will enhance the public domain". Whist Broadway generally supports this objective, our significant experience has shown retail activation of ground levels without consideration of the quantum of and viability of retail in the broader precinct leads to underperforming retail usages that do not contribute to the overall precinct value or desirability. Activation of the ground levels should have consideration given to non-retail uses, such as recreation spaces, business premises uses, health and wellness facilities and community or medical centres. These other active uses should therefore feature as examples within Land Use objective (b).

In general, therefore, whilst Broadway generally supports the premise and the proposed controls within the Blackwattle Bay SSPS, it is considered that the comments made above should be considered in the finalisation of the planning controls and design code to ensure that the quantum of retail floorspace is capped and is specifically intended to service the local worker and resident community within the 800m walkway catchment.

Broadway would be happy to meet with Infrastructure NSW or DPIE to discuss this submission or our retail insights and experience to deliver a sustainable mixed-use outcome. Accordingly, please contact our office on (02) 9080 8518 or Benjamin.Conlon@mirvac.com if you wish to discuss any aspect of this submission further,

Kind Regards,

Benjamin Conlon

National Manager, Retail Development Strategy

163931

Connolly

Lilyfield 2040

See attached file from Anne Connolly 12 Percival Street Lilyfield 2040.

I totally oppose the proposals outlined in the SSP. See attached my comments.

Submission to the Blackwattle Bay State Significant Precinct Study (SSP Study)

From residents of Percival Street Lilyfield

Introduction

The State Significant Precinct Study is a rezoning proposal that seeks approval for new planning controls to support the renewal of Blackwattle Bay. It therefore has significant broad implications for rezoning of the Blackwattle area and its adjacent boundaries.

The optical presentation of the SSP study has a strong focus on certain requirements including the redevelopment of the Sydney Fish Markets. However, a further analysis of the report released by Infrastructure NSW in support of the SSP study suggests that the Fish Markets proposal is something of a distracting secondary element in a vast and far more intrusive rezoning proposal for Blackwattle Bay.

The Bay as it stands has provided the residents of Glebe, Rozelle, Annandale, Balmain and Lilyfield with a gem in a dwindling green area in the wider Bays precinct. The existing Foreshore Promenade to the west of Blackwattle Bay provides huge numbers of residents with one of the few walking areas remaining due to the behemoth of the WestConnex. The Blackwattle Bay proposal – if successful – will overshadow the promenade which is attractive as it stands because it is a sun trap for people in the area.

Despite its almost 250 pages, the study has not considered the impacts such as these on residents in the surrounding areas.

I have not seen any examples that voice support from the community for the tower blocks proposed by the rezoning proposal. I vehemently oppose the redevelopment of the precinct on the scale that is proposed under the SSP. This SSP smacks of blatant moneygrubbing by the government on behalf of developers. There is little transparency in the report about who the developers are and what processes they have in place for their plans. It is clear though that the scope of the study requirements has a strong focus on developer contributions and requirement 5 outlines government priorities precisely.

Principles underlying the proposal

– Design and Place Principle 1 of the SEPP:

Design places with beauty and character that people feel proud to belong to. This is intended to define scale of development in keeping with the existing community. The following over scale options lie in direct opposition to what the community wants and the principles outlined in the SEPP.

The directions under B5.1 – *A Metropolis of Three Cities* are clearly designed to focus on people and place.

Direction 1 – A city supported by infrastructure

Direction 2 Development that complements the area – buildings that fit with the Peninsula's evolving character

Direction 3 A city for the People

Direction 8 A city in its Landscape

On first viewing these directions are in keeping with the broad evolution of the Bay, of its history and of its place in the Glebe and Pyrmont area and the wider Bays precinct. However, the detail on p:79 of the report outlines scale of a very different kind:

Scale

The proposed dwellings are in direct contradiction to the principles outlined in the SSP. The only Objective that will be met by the following proposals is Objective 9 which "Optimises financial and economic benefits to NSW".

There will be 4x 24 storey towers

5 x 8 storey towers

3 up to 34 storey towers each on an 8 storey street wall = 42 stories x 3.

None of these high density options for housing complement the area. They will only benefit developers.

The BTR housing amendments to the SEPP allow for extensive BTR percentages as part of the 1550 dwellings. This will detract from a sense of community in the area because people will be largely transient compared with the rest of the wider community. There is currently a good mix of housing options in Glebe, Annandale, Lilyfield, Rozelle and Balmain and to a lesser extent in Pyrmont and these BTR proposals will change the area completely. Developers have been given an open invitation for high rental profits. We can see from Melbourne's recent COVID 19 outbreaks in their dated high rise towers, how disadvantaged these people were and how they were forced into lock down for much longer periods than the rest of the community because of the density of their housing.

This is a lazy short-sighted option which flouts the opportunity to carefully grow this part of the city. It is completely out of scale and does not fit with the evolving character of the area. There is no diversity of housing on offer with low to medium housing as there is in Pyrmont, Balmain and Glebe.

Community Consultation

The consultation process to date has been a mishmash of meetings with the curious Community Reference Group and other seemingly carefully chosen groups. The Community Reference Group has a strange mix of no less than 5 district football clubs. There is a representative from the Canterbury District Football Club. Why not room for a community based residents group from neighbouring Pyrmont, Lilyfield, Rozelle or Balmain? Canterbury?

The 2017 Elton Consulting Community Feedback on the Draft Masterplan Principles for the Bays Market District has been flagged in the SSP as a key component of community consultation. However, the report appears to have been completely overlooked. The

community priorities listed were transport, landscape design, climate change, and the provision of affordable housing. They did not prioritise housing on the scale that it is now being promoted. Principle 20 outlined in the Elton report requested:

> "ensure strong coordination between public benefits and economically, socially and environmentally viable development"

In other words, the community was opposed to the proposed use of the site. This feedback was provided

" in the context of considerable concern within some sections of the community …including anger regarding the proposed range and use of the site…and lack of confidence in the planning and consultation process for the Bays Precinct Masterplan." P:4.

Respondents generally preferred better access to the site by the public over and above redevelopment of the site, including the Fish Market and **nothing has changed**. Residents still want that. The Berejiklian government and the Minister for Planning do not appear to care about the community needs regarding the Blackwattle Bay SSP. The government is too interested in meeting the needs of the developers over longer term planning which aims to support community driven change.

When Frank Gehry visited Sydney to open his masterpiece – the Chau Chak Wing building which he designed – he was asked to comment in general on the architecture of Sydney.

He said it was terrible, that the only decent design in the city was the old sandstone buildings in the inner part of the city. Everything else he said, was boring. This will be the legacy of the Berejiklian government. The boring, car centred, high rise, developer driven behemoths all scrambling for the last vestiges of harbour foreshore. Disgusting.

181411

Cranwell

Annandale

See attached submission by the Sydney Secondary College Campus Parents and Citizens Association

Blackwattle Bay State Significant Precinct Study

Submission by the Sydney Secondary College Blackwattle Bay Parents and Citizens Association

The Blackwattle Bay Campus Parents and Citizens Association is an incorporated P&C association representing the parents and carers of the approximately 800 year 11 and 12 (higher school certificate) students.

The school site adjoins the precinct at its southeast corner on Bridge Road Glebe. The current fish market site is only about 370 metres from the school, across Blackwattle Bay.

Part of what actually the school site (lot 3 DP 1018801) is shown as open space (that is, shaded green) on some of the maps in the Study including SK-81 Final Precinct Plan and Figure 4.1 of the Visual Impact Assessment (attachment 15). The Visual study also shows at page 55 part of the school site as "Land – Direct Public Views" and the balance as private . Any misapprehension that any of the school is public open space should be corrected.

The Association notes the statement that "Consultation has also included numerous meetings with NSW Department of Education - School Infrastructure and the Principals of Sydney Secondary College and Blackwattle Bay Campus. Consultation has occurred over a long period, commencing prior to the issuing of the Study Requirements in early 2017 and ongoing since that time. The consultation has informed the preparation of this SSP Study." It is understood this P&C Association was not consulted or what changes were made to accommodate the views of the school and department.

This Association has some concerns with the proposal as it would affect the school and it surrounds.

Increased Student Numbers

The Study says "SINSW [School Infrastructure NSW] has indicated future development of Blackwattle Bay (formerly the Bays Market District) will not generate the need for an additional education facility." The school is currently well over its design capacity, with many demountable classrooms in use to accommodate the high student numbers. It is puzzling that the introduction of up to 1,700 new dwellings will not contribute additional students to schools in the area, including Blackwattle Campus. This Association requests that likely pressure on already over-capacity local schools is reviewed and all necessary expansion of capacity is completed prior to occupation of the new dwellings.

Traffic and Pedestrian Safety

The proposals for upgrades at intersections at figures 52 and 53 are welcome, though detail is lacking (for example, are signalised crossing proposed, or only marked pedestrian crossings). The roads and crossings around the school are used daily by large numbers of students, mostly in peak traffic periods.

The Association requests that the Bridge Road/Wentworth Road intersection is signalised.

The Association requests that the Wattle Street/Bridge Road/Darling Street intersection is reviewed for safety and augmented, including a signalised crossing where currently missing (western side). This intersection is just outside the precinct, but would be directly affected by traffic resulting from the proposals.

It is expected traffic will increase on Taylor St, which runs next to the school's western boundary. The street is narrow and windy, with limited sightlines in places. Any increase in traffic generated by the new fishmarkets and other parts of the proposal would increase the hazards for students crossing the road. Steps should be taken to minimise additional traffic and ensure speeds are controlled. Traffic calming and control devices may be warranted.

Construction Noise and Nuisance

It is noted the school is identified as a "sensitive receiver" of noise. The school raised concerns at the potential for interruptions to important events, such as HSC exams. This Association reiterates these concerns at the potential for disruption to classes and requests all necessary steps, including cessation of work, are taken to ensure students are not interrupted and disadvantaged.

Similarly, any dust, smell, light or other nuisances must be minimised and mitigated.

Noise and Nuisance

There is the potential for adverse noise impacts form the developments, including the fishmarkets within the precinct. The study does not appear to address the special needs of the senior high school for reduced interference from noise. The Association requests further work on the noise impacts of the developments and mitigation measures as necessary, such as double glazing and air conditioning.

School site

The potential for unauthorised entry to and use of the school site will increase with the proximity of the proposed fishmarkets – separated by only a small "local park". Measures should be introduced to prevent such possibilities. While the school community prefers the current unenclosed frontage to Blackwattle Bay it may well be that with increased patronage Infrastructure NSW as a result of its project may need to better delineate and secure the school boundary through hedges, plants, moat, depression or other means. The Association has noticed an increase in incursions by the public during the Covid lockdown, presumably due it being largely vacant and mistaken for public open space.

Transport

Students and staff of the school rely on the light rail and local bus routes. The light rail would be the major mode of public transport to the CBD and Central Station. Any increase in patronage due to the proposals must be offset by increased capacity to ensure students are able to efficiently travel.

Bulk and Scale of Development

Beside the new fish market, the major element of the precinct proposal is large residential buildings resulting in a considerable increase in population.

“A solar envelope has been developed for Blackwattle Bay by projecting sun planes at the relevant times on June 21st to protect the Glebe Foreshore, Sydney Secondary College and Wentworth Park from overshadowing from the new built form.” It Is not clear if this will result in no overshadowing at all of the school. It appears there may be some overshowing early in the morning in winter, such as from Building BLD 3 at 156 metres (see Fig 41 – Shadow Overlay). This may be insignificant to the amenity of the school, but should be confirmed.

Noting the new fish markets is approved and under construction, its bulk and scale in such close proximity to the school is not ideal. For example, see the image on page 105 of the study showing a bulky three storey building.

The Association notes the proposal includes about 12 new buildings including 7 towers with a mix of residential and commercial uses, in differing proportions presented in three scenarios. There are up to 1,700 dwellings and up to 7,000 jobs, and a population increase of2,795. The buildings are up to 156 metres high (by comparison, the Anzac Bridge pylons are 120 metres).

The study states “The area is expected to attract a range of markets including both younger adult age groups driven by all the classic attributes of inner city areas: fast access to CBD jobs in finance, banking and professional services, as well as a range of entertainment and cultural options either on site or within a short walk”. If the current practices of working from home continue after the pandemic subsides the proximity to employment in the CBD may become less attractive.

The summary of the visual study asserts the impacts are generally moderate, with some viewpoints being moderately to highly affected. This includes “the most significant public spaces that will be affected by the rezoning proposal are those that are in close proximity with largely unobstructed views such as the foreshore walk of Blackwattle Bay Park”. The school is immediately adjacent to the foreshore walk, close to viewpoint 1 of the Visual Impact Assessment and presumably is similarly significantly affected, that is a HIGH rating (see figure below – with perhaps an exaggerated distance perspective). It is noted the visual study does not mention the school despite its population of 850 people. The Association is concerned at the potential reduction in amenity generally from the proposals, including adverse visual impacts. It is noted various ameliorations are discussed, such as building articulation, material selection and the like. The Association expects every effort is taken to minimise adverse visual impacts.

More generally, the potential adverse effects of the bulk and scale of the proposal would best be addressed by reducing the bulk and scale overall.

Photomontage of the resultant view from the school. Page 69, Visual Impact Assessment, Clouston Associates, May 2021.

The Executive of the Sydney Secondary College Blackwattle Bay Campus P&C Association

ABN 77673108448

Blackwattle Bay Pandc <sscbbpc@gmail.com>

183281

Deane

Ultimo

We object to Infrastructure NSW proposed planning controls for the Pyrmont side of Blackwattle Bay as it does not prioritize the importance of the public foreshore. Its primary purpose is to rezone public land to residential land.

Total Environment Centre
for the future

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www.tec.org.au
ABN 54 152 721 302

Department of Planning, Industry and Environment
Blackwattle Bay redevelopment submission
Parramatta NSW 2124
cc: eastern.harbourcity@planning.nsw.gov.au

August, 20th 2021
Dear Planning NSW,

RE: State Significant Precinct - - Masterplan
We object to Infrastructure NSW proposed planning controls for the Pyrmont side of Blackwattle Bay as it does not prioritize the importance of the public foreshore. Its primary purpose is to rezone public land to residential land.

NSW planning's foreshore policy as we have seen implemented at Barangaroo and Darling Harbour is to privatize public land and place Sydney's highest buildings on the foreshore. It is deeply inequitable as it takes away many peoples views of the harbour and public foreshore access and gives them to a few, it thus devalues many people's property and civic life to enrich a few - generally large property developers. Public foreshore suits public uses which historically have been given priority on the foreshore: schools, hospitals, parks, museums, gallerys, mariners, retail, transport hubs, etc. everyone benefits and they are Sydney's great public spaces.

The spread of this mini-Barangaroo - offices and residential towers - to the south-western side of Pyrmont makes us all poorer. It sees the same disregard for the public realm as Barangaroo: a narrow overshadowed 'foreshore promenade'. Here though it will be worse than Barangaroo as the shoreline is more south facing and more residents are affected by it.

Area 2 has little public amenity considering the massive rezoning windfall for the owners. A 10m foreshore is replicating all the existing bottlenecks around Blackwattle Bay and Pyrmont. People need to cycle, walk, run in couples in both directions all at the same time, and you need to be able to stop and rest along the way, with room to engage in retail and cafe type spaces. We already know the foreshore width required for this - 100ft (30m) - the historical foreshore reserve width established by Thomas-Mitchell in the 1830s. Public foreshore is why Manly buzzes and Middle Harbour is forgotten. Extra width also gives room to deal with issues that will arise with future sea level rises.

Area 2 cannot be higher than the motorway as this throws shade not only on the immediate foreshore but into the public foreshore in Area 3. If 30m or the height restriction makes the envelope too small to develop, they should be swapped for plots in Area 3 (or Glebe Island if industrial) like the state government did with the fish markets or just resumed.

The image below to the right shows the building heights in this rezoning proposal and the areas involved.

The foreshore promenade needs to be zoned Public Recreation from the beginning and not B4. As we have seen in Darling Harbour and Barangaroo, any wriggle room will see the Developer take away foreshore protection (Barangaroo) or green space (Darling Square).

You can increase the commercial presence of an area if that is the NSW planning's goal and increase public foreshore, North Sydney is a good example of that. The governance split of controls around Pyrmont between the city and state is creating a schizophrenic development process, it needs to be united so that the impact on the whole suburb is considered and not in this piecemeal fashion. The harbour foreshore is of such public importance that any increase in it's privatization, or reduction in public access must be rejected, Area 2 needs a complete rethink so that the public foreshore is enhanced, not overshadowed and restricted.

Yours Sincerely.

Saul Deane
Urban Sustainability Campaigner
Total Environment Centre.

181646

Dr Middleton

GLEBE

My submission is contained in the uploaded file

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Blackwattle Bay State Significant Site Study

Submission from Hands off Glebe Inc

The state significant site study for Blackwattle Bay claims that it plans for a “place for everyone that is inviting, unique in character, socially inclusive and affordable”. It is the view of Hands off Glebe Inc that its plans for residential housing and open space render this vision impossible.

Aspects of the plan that Hands off Glebe welcomes and supports are the completion of the foreshore walk from Woolloomooloo to Rozelle, improved public transport, a ferry wharf, and a possible metro station.

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Infrastructure NSW is seeking the approval of the Minister for Planning and Public Spaces to change the city's planning controls to allow towers up to 45 storeys to be built on the former Fish Markets site.

Earlier this year the community was presented with three different but very similar plans and asked for comments. About 700 objections were received but the plan presented now does not seem to have taken these objections into account at all.

Infrastructure NSW is seeking the approval of the Minister for Planning and Public Spaces to change the city's planning controls to allow towers up to 45 storeys to be built on the former Fish Markets site.

The planning controls proposed will change our foreshore, increase the density of people living and working in our area, and increase traffic and the demand for parking, which will not be adequately catered for. The plan would result in a massive overdevelopment of Blackwattle Bay

In 2017, following a large community meeting in Glebe, the Glebe Grapevine agreed to develop a survey and this was done with some assistance from the office of the local MP Jamie Parker. The views of respondents included:

strong support for any housing built in the area to include affordable and public housing.

93% of respondents wanted some public and affordable housing while only 7% wanted only private housing.

no privatisation of public land.

development of commercial and/or residential buildings on the shore line must be low rise. High rise is not to be allowed in this part of the Bays Precinct. (Limit to 5 storeys)

….Any residential development must include 20% affordable and 20% public housing.

The Glebe community survey showed a strong commitment to low rise development in Blackwattle Bay with a preferred maximum built height of 5 storeys. We are therefore appalled to see the current plan proposing some buildings of 45 storeys.

This will inevitably create an alienating concrete wasteland that will undermine the government's vision of building an inclusive and iconic waterfront destination that celebrates innovation, diversity and community.

With such high rise developments there is no hope that the rejuvenation of Blackwattle Bay will create spaces that sit well with our Glebe Village lifestyle but also expand our horizons as more visitors arrive and more opportunities for employment and leisure are created.

We do not want our bay and its foreshores surrounded by high rise buildings created for profit rather than to meet the needs of the people of Sydney. We want low rise homes that are a mix of public housing, affordable housing and private housing, reflecting the current rich diversity in the inner west.

Infrastructure NSW is seeking the approval of the Minister for Planning and Public Spaces to change the city's planning controls. These changes would permit changes to the foreshore, increase the density of people living and working in our area, and increase traffic and the demand for parking, which will not be adequately catered for. The plan would result in a massive overdevelopment of Blackwattle Bay and the privatisation of our harbour foreshore."

Aboriginal heritage

The commitment to protect and preserve the physical evidence in Blackwattle Bay of Aboriginal occupation in the form of rock engravings and middens is most welcome.

There is also a stated "strong commitment to ensuring culturally inclusive and respectful engagement with Aboriginal people … through engaging, innovative and exceptional cultural, social and physical infrastructure." However it is a matter of deep concern for us that there is no indication anywhere in the document of how this is to be achieved. The provision of a yarning circle is totally inadequate for this purpose.

Developer profits

The plan fails to address the urgent need for social and affordable housing. It includes 12 building envelopes for a cluster of towers reaching 45 storeys (which is higher than the Anzac Bridge) and smaller buildings of four to eight storeys providing 1550 apartments.

We support the statement by Sydney Lord Mayor Clover Moore that the proposal is "a Trojan Horse for large apartment towers designed not with people in mind, but maximum developer profits".

Instead of doing what is best for our community and the city, the government is trying to generate as much money as possible from this site to cover the ballooning $750 million cost of the Sydney Fish Market relocation.

No public housing

The plan states that "it is not anticipated that the Precinct Plan would result in contributions to social housing on-site." Given the urgent need for public housing we ask why not?

The plan acknowledges that the lack of affordable housing has "a knock-on effect of reducing a socially diverse and healthy community and access to key workers".

The 2017 Glebe community survey called for 20% affordable and 20% public housing in any residential development. However, before COVID-19 hit, there were about 50,000 people on the NSW public housing waiting list. It is estimated that the effects of the pandemic could send up to 8,000 more people into homelessness.

In our view this situation calls for a far greater investment by the NSW Government in public housing.

Apart from its potentially significant role in the post-pandemic economic recovery, public housing has many other advantages. Access to public housing provides stability and lowers the risk that vulnerable families become homeless. It decreases housing stress and by limiting housing costs,

public housing leaves families with more resources for expenses like child care and transportation as well as basic needs like food and medicines.

Quality public housing helps create a stable environment for children, contributing to improved levels of school attendance and educational outcomes. Public housing located near public transport can help low-income residents save money, access better jobs, improve health and reach critical community services.

The number of homeless and unstably housed seniors is growing. Quality public housing can promote better mental and physical health, improved quality of life and independence for low-income seniors. For frail seniors and people with disabilities, public housing enables them to remain in their home communities and avoid or delay moving into nursing homes or other institutions that are much more costly for state and federal governments.

Hands off 6lebe Inc is therefore of the opinion that the housing developments in Blackwattle Bay must be at least 50% public housing.

Affordable housing

The NSW Government's Affordable Housing Ministerial Guidelines defines affordable housing as: " housing that is appropriate for the needs of a range of very low to moderate income households and priced so that these households are also able to meet other basic living costs, such as food, clothing, transport, medical care and education. As a rule of thumb, housing is usually considered affordable if it costs less than 30 per cent of gross household income.

The plan envisages a condition on residential development at Blackwattle Bay requiring a contribution towards the provision of affordable housing. According to the plan, the "contribution would be equivalent to 5 per cent of the total floor area of the development that is intended to be used for residential purposes for the purpose of affordable housing. The contribution would be made by way of a dedication of affordable dwellings within the precinct and/or paid as a monetary contribution."

There is also a possibility that the small amount of affordable housing currently proposed could be further reduced. The plan states that the "proposed block structure retains flexibility for increased commercial use should the introduction of the Sydney Metro to Pyrmont and market forces support higher levels of workplace accommodation. Tower forms tested for residential could be delivered as commercial use or other uses such as hotel, serviced apartments or student housing."

The plan asserts that "Cash contributions to community housing providers has the potential to result in more, and more sustainable, affordable housing than the dedication of dwellings in the Study Area."

However, there is no proposed mechanism whereby the construction of affordable homes using the monetary contributions is mandated and so no assurance is provided that any affordable homes will actually be built.

Noise

The plan indicates that for most residential areas, road traffic noise and industrial noise will be a problem requiring mitigation. This may include "closed windows and mechanical ventilation" – in other words, no fresh air at all – which is unacceptable.

The plan states that "should Hymix continue to operate, significant noise impacts … are anticipated, particularly to the facades overlooking Hymix".

According to an Independent Planning Commission media release, "the Department of Planning, Industry & Environment received objections from the Inner West Council and more than 50 members of the public. Opponents raised concerns about the permissibility and strategic justification for the development; its bulk and scale; visual and amenity impacts, including air and noise pollution; as well as traffic and parking."

Hymix was granted development consent on 23 July this year for "a $22-million concrete batching plant and aggregate handling facility …. Under its proposal, up to one million tonnes of aggregate

would be shipped to the port facility each year to produce about one million cubic metres of concrete … The materials were to be stored on site in a number of silos up to 34m tall."

The consent was granted subject to conditions which mitigate its impacts, including "a reduction in the height of the aggregate storage silos, a restriction on night-time ship deliveries, … and further noise, air quality and traffic mitigation measures."

Despite this, apparently "significant noise impacts … are anticipated". In light of this, it is the view of Hands off Glebe Inc that residential housing cannot be developed on the site unless consent for the Hymix plant on Glebe Island is withdrawn.

Pollution

It is clear that clean air will be a victim of the proposed overdevelopment of Blackwattle Bay.

The plan acknowledges that in addition to emissions from vehicles travelling along the Western Distributer and Bridge Road and marine traffic within Blackwattle Bay and the wider Sydney Harbour, ships entering, leaving and berthed at the White Bay Cruise Terminal will emit "combustion products that have potential to impact on local air quality".

Implicitly admitting that pollution can be expected to reach unacceptable levels as a result of emissions from the Hymix plant, the plan recommends that the lower floors of buildings located closest to the Hymix facility should be commercial/retail use and residential homes should be located on higher floors.

No explanation is offered as to why occupants of and visitors to commercial and retail premises (including cafes and restaurants) should be expected to suffer the immediate and longer term health impact of such pollution.

Light pollution will be an issue not mentioned in the plan. Glebe residents will suffer from the reflected light off the high-rise buildings – it will be blinding in the afternoons.

The height of the towers above Pyrmont, Ultimo and Glebe will mean a loss of privacy. Residents in existing building and low rise homes will be overlooked.

Fish Market**"**

The government suggests that the "new Sydney Fish Market will be the key catalyst for regeneration at Blackwattle Bay …. The new Sydney Fish Market will expand and improve the functions of the existing fish market and will include a variety of fishmongers, restaurants, cafes, bars and specialty food retailers."

This suggests that this is a much needed wholesale fish market. It is not. There is a perfectly adequate wholesale market in a purpose built building on the existing site. There is no proposal to expand the wholesale component.

It is suggested that the wholesale market is a major tourist attraction. It is not. The wholesale market starts very early and is finished long before the tourists get out of bed. To see the market in action you need to be up very early and book a tour.

The development will be built over what is currently harbour. RMS has always insisted that over-water developments should be essential and minimal. This is neither. When James Packer wanted to build his casino over the water, Sydney rightly said no.

There is no essential reason to build even the wholesale market over the water. Most of the produce arrives by truck and all leaves by truck. It could just as easily be at Flemington. If proximity to source is important, it should be by the airport

What this development is about is the retail component. Our community does not want the harbour fritted away for a shopping mall. This overdevelopment should be assessed for what it is – a shopping mall that will consume pristine harbour.

Green space

The report states that “The Precinct Plan includes significant areas of open space along the foreshore. A total of three hectares of new parks and plazas is proposed, equating to approximately 30% of the site area.”

Does this include roof top gardens which are private? In addition, cafés and commercial spaces along the walkway will have tables and chairs out, effectively privatising the tiny amount of “green” space available.

The document describes “A ribbon of parks and open spaces with distinct characters is linked by the waterfront promenade and street network” and herein lies the problem: The 30,000 square metres include small parks, roads, lanes, pathways and pocket parks. Where is the open space for football, cricket and similar exercise?

Perhaps it is assumed that Wentworth Park is able to provide large open space for such activities. However, the park is already overused and its space should not be included in any Blackwattle Bay plan. However, a statement was made in a webinar that an all weather field in Wentworth Park would be financed. This overuse of the park is unacceptable.

The much touted 30,000 square metres of green space also includes dark and gloomy spaces under the ANZAC bridge and the flyovers to and from the bridge.

All the images in the plan show healthy plant life, but what plants will grow in the gloomy recesses between the buildings? Will there be bird life and animals? There will be plenty of seagulls no doubt.

Shadowing

We note with concern a reference to ***minimising*** additional shadowing to Wentworth Park. It is hard to see how shadowing can be avoided with residential blocks of up to 45 storeys.

Wentworth Park is being gradually surrounded on all sides by high rise towers and the Blackwattle Bay plan adds to this increasingly unacceptable pressure on this invaluable environmental and social resource.

It is simply not acceptable that shadows will be cast across the new fish market’s energy collecting roof and also that the “world class” walk way will be in shade.

What does this mean?

HOG is alarmed by the statement in the report that the “NSW Government is currently evaluating the most appropriate long-term ownership and management structure for the government-owned lands at Blackwattle Bay.”

Is this opening the way for further privatisation of public land, for the criminal loss of public property for the sake of a temporary financial boost and for the further abrogation of government responsibility to ensure that all citizens are decently housed?

182696

Dunlop

Annandale

The attached file represents my views and those of my family.

the glebe society inc.
COMMUNITY • ENVIRONMENT • HERITAGE

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Janet Wahlquist
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18 August 2021

Department of Planning, Industry and Environment
Blackwattle Bay Submission,
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planning.nsw.gov.au/Blackwattle Bay

Dear Sir/Madam,

RE: Blackwattle Bay State Significant Precinct Study

The Glebe Society is committed to protecting and conserving the heritage, environment and community of Glebe. It was founded in 1969 and has over 400 current financial members. One of its proudest achievements is its role in reclaiming the land around the foreshores for the public as industry left the suburb, and the subsequent development of the foreshore walk and parks around Blackwattle and Rozelle Bays. Blackwattle Bay is one of the boundaries of Glebe, and The Glebe Society cherishes the Bay, its history, its natural values and its amenity.

The Glebe Society objects in the strongest possible terms to virtually every detail of this study; to the assumptions, to the 'vision', to the proposed legislative and planning changes, and to the plan itself. The Society also objects to the process recommended in Blackwattle Bay State Significant Project, Statement of Intended Effects.

The Glebe Society believes the development should not be classified as State Significant because it constitutes extremely poor planning. The primary consideration has been density at the expense of other requirements, including important community-supported criteria, some of which are listed in the Appendices.

The land in question is public land, but we believe that not only does it not deliver any public good, the plans, if delivered, would be detrimental to the site, to the precinct, to Blackwattle Bay and to Glebe.

The Glebe Society believes the proposal is a massive overdevelopment of the site, and would bring more residents and workers to the area than could be sustained.

The foreshore walk is far too narrow. It would be overshadowed by the buildings and windy. Paths shared between pedestrians and cyclists do not work.

There is inadequate provision of affordable housing.

The needs of passive water users of Blackwattle Bay, the so called "blue space" have been overlooked. The plan preferences private marinas over community users and access.

The plan states that 30 per cent of the area is public open space, but much of it is in overshadowed windy areas between tall buildings.

In September 2017, the NSW Government invited community members "to engage in the visioning for a future Blackwattle Bay" and to contribute to the writing of a set of Design Principles to guide the preparation of the Precinct Plan. The result was 16 guiding principles.

However, the plan fails to fulfill 11 of its guiding principles, and there is no clear path to fulfilling another two. (Appendix 1).

The plan also fails to meet six of the the nine objectives that apply to consultation with the community and stakeholders. (Appendix 2).

This development, and the construction of the new Sydney Fish Market (SFM), are based on pre-Covid 19 pandemic thinking. Tourism from China has collapsed and workers and residents are leaving the CBD. The State Government faces having a ring of new, underutilised buildings around Blackwattle Bay, a Bay that belongs to the people of NSW.

For Glebe residents, the proposed development would literally overshadow the suburb in the early morning. The buildings would tower over the Bay, destroying the natural amenity of the Bay, and bring increased traffic pressure to our roads that will also have to cope with unacceptable increases in traffic and parking from the new SFM.

The Glebe Society has fought, and continues to fight, to maintain Glebe's wonderful built heritage. The proposed development, touted as an extension of the CBD, would place further pressure on Glebe to yield to intrusive, inappropriate and unacceptable developments.

On the Pyrmont side, the Western Distributor is a shadowy chasm separating Pyrmont from Blackwattle Bay. It destroys the legibility of Pyrmont as a peninsula and is a gloomy wasteland redolent of danger which makes the pedestrian experience of walking across Pyrmont to the bay unpleasant.

The views to the west with the harbour in the foreground and beyond Glebe Point, with its interesting topography landscape and architecture, are beautiful and interesting. Great potential exists to open up these vistas. It is a distinguished, indeed, a painterly vista which allows the Distributor with its vertical stanchions and horizontal roadway to be read as a frame enclosing a great and beautiful landscape.

The proposal does not take advantage of these opportunities. Apart from a narrow slot of open space to the bay on the Miller Street axis, the proposal will make the Distributor's under croft even gloomier by enclosing it with a wall of buildings.

This is not the hallmark of distinguished place making. Blackwattle Bay provides the opportunity to show the world how clever design can ameliorate the impact of traffic engineering on a beautiful place. The scheme fails dismally in this regard.

The document correctly identifies Blackwattle Bay as *an extraordinary opportunity to reconnect the harbour, its surrounding neighbourhoods and the city; to showcase Sydney's living culture and stories of Country; to build an inclusive and iconic waterfront destination that celebrates innovation, diversity and community.* (Blackwattle Bay State Significant Project Study, page 1)

The Plan fails that vision. (Appendix 1).

Consultation

The Glebe Society has participated over the years in a series of meetings, seminars and planning about the future of the Bays Precinct. The release of the three scenarios, titled "Revitalising Blackwattle Bay", which included 45 storey towers in May 2020 was sprung on the community without consultation. The community was shocked by the proposal and overwhelmingly rejected it. The Plan again ignores the results of many consultations, and the wishes and aspirations of the community. The Plan fails six of its nine objectives for community consultation. (Appendix 2).

RECOMMENDATION 1. The Glebe Society requests the Minister for Planning, Industry and Environment order a review of the proposals for Blackwattle Bay, and institutes genuine consultation with the community to produce plans that respect the environment, heritage and architectural scale of Blackwattle Bay.

Lack of a Master Plan

In March 2010, "Towards an Integrated Strategic Plan: Bays Precinct" was presented to Government. It was the result of wide consultation. All master plans for Blackwattle and Rozelle Bays were cancelled when the Coalition Government was elected in 2012. Planning for the Bays passed to Urban Growth, and then Infrastructure NSW (INSW) where it remains.

The Plan is the result of a series of changes to planning legislation. It seeks changes to six State planning controls. (Blackwattle Bay State Significant Precinct Study (BBSSPS), page 96).

These include amending the Sydney Local Environment Plan 2012 to allow a maximum building height of 156, and removing the site from the Sydney Harbour Catchment SREP.

The Plan seeks to remove the requirement to prepare a Development Control Plan when proposed developments increase gross floor area. SREP 26 deals with the protection of views and the scenic quality of foreshores and waterways, but the Plan ignores that, instead producing a concept DA.

RECOMMENDATION 2

The Glebe Society requests the preparation of a Master Plan as the basis for development. The terms of reference for the Master Plan should include:

- **the height, bulk and configuration of the build form must reconnect Blackwattle Bay to Pyrmont**
- **the foreshore walk must be at least 30 metres wide**
- **height controls of the existing LEP must be respected**
- **the impact of the Western Distributor must be minimised through good design**
- **and the long-standing use of Blackwattle Bay by rowers must be protected by controlling other users.**

The Master Plan should be prepared for public exhibition and the City of Sydney should be the consent authority for the development.

The Glebe Society seeks compliance with SREP 26 that would ensure the development would enhance views and the scenic quality of foreshores and waterways.

The Blackwattle Bay State Significant Precinct proposal is a massive overdevelopment.

The proposal is for twelve buildings as follows:

1 x 45 Storey building	(156 metres)
1 x 32 storey building	(120 metres)
1 x 30 storey building	(110 metres)
2 x 25 storey buildings	(91.5 metres)

1 x 20 storey building	(75.5 metres)
1 x 19 storey building	(72 metres)
1 x 17 storey building	(65 metres)
2 x 10 storey buildings	(37.5 metres)
2 x 5 storey buildings	(21 metres)

The tallest buildings, with a maximum height of 45 storeys (156m) are higher than the pylons of Anzac Bridge (120m). They are far higher than the highest buildings on the Pyrmont peninsula. The urban form of Pyrmont should step down to the waterfront but the planning proposal is for a wall of very high buildings along Blackwattle Bay.

The height controls in the current Sydney City Council LEP are well considered and relate to the controls nearby. They provide for a maximum of 33 metres (nine storeys). There is no justification for changing this to a maximum height of 156 metres. Buildings of this height are only found in the CBD. There is no planning or economic justification for having this height on this site.

It should be noted that the background planning documents identify the need for *a well-designed fine grain network comprising streets, laneways and arcades which will enhance the accessibility of the waterfront and permeability of the precinct.* This is not what is proposed.

The buildings are so tall they would cast shadows over Blackwattle Bay in the morning, including over the solar panels of the new SFM, and create wind tunnels between the buildings.

The buildings are too dense, and the expectation of 1,550 dwellings, 2,800 residents and 5,600 people employed there, would put further, damaging, pressure on an already very densely populated suburb.

The site itself is narrow, and overshadowed by the Western Distributor. This would create air pollution and noise problems for tenants of the proposed buildings. In fact, the lowest nine floors would fall outside government guidelines for apartment air quality and noise levels, so the plan is for those floors to be used for business and retail. Surely this puts the health of the workers in those businesses at risk.

The noise and air pollution from the Western Distributor would also mean it will not be possible to open windows on the north east side of the building adjacent to and above the western distributor, inhibiting natural ventilation. This compromises the vaunted sustainability of the proposal.

Sustainability is further compromised by lack of solar access. The BBSSPS states: *Setbacks, building separation, orientation and floor plate layouts across both sites ensure that 70% or more of the apartments in each residential tower are able to achieve a minimum of two hours of sunlight on the 21st of June (winter solstice).* (p. 113).

What about the other 30 per cent?

Further, the determination of the Hymix concrete batching plant to remain at its Banks Street site, will mean the proposed residential, office and retail space will be immediately adjacent to a noisy industrial site, with frequent truck movements, with the possibility of working 24/7. (BBSSPS page 71)

RECOMMENDATION 3: 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. Buildings should also conform to sustainable building standards.

The plan does not deliver a foreshore walk congruent with the walk along Johnstons Bay and around the Glebe foreshore. It is too narrow, too shadowed and too windy. At 10 metres wide it is too narrow to provide for the number of people who will use it, which would include pedestrians, shoppers and tourists milling about, cyclists, parents pushing strollers, wheelchair users and people walking dogs. If the Glebe foreshore is any indication, the proposed walk will come under heavy pressure.

The new SFM is expected be a local, national and international tourist attraction. This, along with the completion of the 'missing link' in the foreshore walk from Woolloomooloo to Rozelle Bay, means it will be used by large numbers of people.

The Glebe Society objects to the path walk being a shared path (shared by both pedestrians and bicycles) which has been shown not to work on the Glebe foreshore walk. It needs to be at least 30 metres wide to accommodate so many different users, and to allow for separate paths for pedestrians and cyclists.

The parks proposed are small, narrow and piecemeal, and will be overshadowed for the first half of the day. They will also be windy, thanks to the proposed buildings creating wind tunnels. The City of Sydney has produced a map indicating 13 places on the proposed plan that are not safe, while 27 are not comfortable for walking. It also argues standing and sitting comfort is not considered.

The City of Sydney states the sunlight in the proposed parks is less than the City's requirements, and few, if any, streets will have enough sunlight for good tree growth.

The BBSSPS states that 30 per cent of the site will be open space, but a narrow corridor between two towers, though counted in that percentage, does not fit that description.

The most recent inner city foreshore development, Barangaroo, allocated 50 per cent of the area to open space.

RECOMMENDATION 4: The Glebe Society believes 50 per cent of the area should be open space. The foreshore walk should be 30 metres wide, with separate paths for pedestrians and cyclists. Adequate seating must be provided.

Tree plantings must have adequate sunlight to grow and be protected from damaging winds.

The expectation that 80 to 85% of residents will not use private cars is unrealistic. It also borders on the bizarre, given the growing presence of Westconnex across the Bay that will deliver huge numbers of cars to the Bay. The BBSSPS in fact boasts that the major stages of Westconnex will be completed in 2023, *two of which [will] deliver road infrastructure to the Bays.* So many cars, so little parking.

Plans to improve public transport, including buses, light rail and ferries, to the area would be welcomed – if they actually come into effect. Although the plan expects an increase in light rail services, it is understood the expansion of light rail, which prior to the pandemic was at capacity in peak hour, cannot be expanded due to the power supply, stabling, the single track

and Dulwich Hill. ("Extra trams to east crowding on Sydney's Inner West line still years away." Sydney Morning Herald, July 2, 2019).

We note the new SFM, while expecting a doubling in visitor numbers over the next ten years, is not providing a single extra car space in the new building. Glebe residents fear our street parking spots will be overtaken by visitors to the SFM, and locals, most of whom do not have private parking spaces, will be disadvantaged. Despite the expectation of the planners, people will still want to own cars and to drive. The shortage of parking spaces will place even more pressure on Glebe.

RECOMMENDATION 5: Reduce the forecast population of residents and workers. Establish new public transport routes, including a ferry service to Blackwattle Bay, and where possible increase existing services.

Only five per cent of the residential supply would be affordable rental housing, or developers can make an equivalent monetary contribution, which can be used elsewhere. This has been the past experience in Pyrmont. There is a huge demand for affordable rental housing in the inner city.

The City of Sydney advocates 25 per cent for government owned land.

RECOMMENDATION 6: That 30 per cent of residents be affordable rental housing, comprising a mixture of one-, two- and three-bedroom apartments. If the developer opts to make an equivalent monetary contribution, that must be invested in local affordable housing.

Blackwattle Bay is the prime attraction, but there are too many encroachments on it – including the new SFM – and inadequate consultation with water users.

The Glebe Rowing Club is the third oldest rowing club in Australia, founded in 1879. For over 150 years the local water sports clubs have provided the local community with inclusive and affordable access to the Bay.

The section of the report dealing with heritage makes no mention of the significance of the long presence of rowers and the rowing club in the Bay.

The current water users, which include members of the Glebe Rowing Club, the Sydney University Women's Rowing Club and the Blackwattle Bay Dragon Boat Club, as well as canoers, kayakers, paddle boarders and sailors, access Blackwattle Bay for sport and recreation every day.

They are particularly concerned about the proposed marinas and increased motorised boat movements expanded on the "urban blue space" of Blackwattle Bay, and the safety of water users.

Private marinas are only available to a select few, while community sporting and recreation clubs, like rowing, dragon boating, and other individual small water craft are open to the entire community.

But instead of giving the community greater access to the waters of Blackwattle Bay, the proposal hands valuable water space to corporate and charter marinas.

Denser communities have a greater need for open space, for opportunities to exercise. But the Plan does not adequately protect the existing community uses of the Bay, let alone provide the capacity to cater for the proposed increased population.

The new SFM will reduce the area of the Bay, and increase water traffic.

The plan will also lead to an increase in marine traffic, including ferries, but there is no plan to manage this safely.

RECOMMENDATION 7: Prioritise the needs and the voices of the community for access to Blackwattle Bay over those of the private marinas. Produce a marine safety plan, in consultation with passive water users.

The health of Blackwattle Bay has been overlooked

As industry has moved out of Blackwattle Bay the water quality has improved. Over 25 fish species and 50 other organisms, including oysters, shrimp, limpets, sponges and algae have been found in the Bay. The Glebe Society opposes any move that would threaten this biodiversity.

Increased numbers and movements of large motor boats and commercial craft have the potential to stir up the sediment, which contains toxic sediments, including the heavy metals mercury, lead, zinc and copper, and other contaminants including asbestos, arsenic, polycyclic aromatic hydrocarbons and total petroleum hydrocarbon. All these have been found in the sediments at levels that exceed both *low and high trigger value sediment quality guidelines protective of ecological communities.* (DA for Stage one of the New SFM, E.I.S. 7.10.3 p. 156).)

Marinas need solid, vertical sea walls, but these severely restrict marine ecosystems.

Around in the next Bay, Rozelle Bay, Sydney Water is rehabilitating Johnstons Creek. It is replacing a walled concrete channel with sloping rock beds, walls of differing heights, and creating a range of niches to support and encourage a wider variety of marine and botanic life.

Blackwattle Bay once extended into the area now under Wentworth Park, in the form of a mangrove forest. Shane Phillips, from the Tribal Warrior which is moored on the Pyrmont side of Blackwattle Bay, told the gathering at a smoking ceremony for the new SFM, that the mangrove forest was the fish market in pre-settlement times. This is a critical part of the area's First Nations heritage.

Bridge Road was so named because it was a bridge across the Bay.

Redeveloping the northern bank of Blackwattle Bay offers an unparalleled opportunity to restore the Bay, to provide access to the community, and to alter the sea walls to increase habitat for marine life.

RECOMMENDATION 8: Rehabilitate the Pyrmont side of Blackwattle Bay, incorporating rocky sloping beds, sandy beaches, and a range of ecological niches for marine organisms. The Glebe Society demands that the plan respects the area's deep First Nation's heritage.

Around the Bays

It should also be noted that there are plans to develop the large swathe of state-government owned land along the adjacent Rozelle, White and Johnstons Bays. While the White Bay plan is in the early stages, the draft strategy includes illustrations of yet more high-density buildings.

The Glebe Society fears the Bays could end up ringed with towers, with only our heritage standing between Glebe and overdevelopment.

RECOMMENDATION 9: The plan must take into consideration development around the adjacent bays, and the impact of those plans on the local community and environment.

The COVID pandemic has changed how we live and work.

It should also be noted that the plans were all made before the COVID pandemic, which has changed tourism, and the way people live and work in the CBD.

The new $750 million Fish Market was planned on the expectation of visitor numbers doubling in the first ten years. This is largely based on the expectation of increased tourism, particularly from China. That tourism has ceased, and given the current state of the pandemic and relations between Australian and China, is unlikely to resume any time in the near future.

The pandemic and tensions with China have also impacted Chinese investment in real estate and overseas student demand for accommodation.

Since the pandemic, many CBD workers have opted to work from home, and many CBD residents have moved further afield. Vacancy rates for both CBD offices and apartments have soared (https://www.smh.com.au/business/companies/office-vacancies-hit-quarter-century-high-but-green-shoots-emerging-20210804-p58fpd.html, https://www.smh.com.au/money/investing/vacancy-rates-still-high-for-inner-city-rentals-20210416-p57jtc.html).

The proposed Blackwattle Bay development, along with the new SFM, risks falling victim to the Covid pandemic, adding to the oversupply of vacant residential and office space in the CBD, and financial stress for the developer.

RECOMMENDATION 10: INSW should engage independent consultants to put together a report on the projected impact of COVID and tensions with China on longer term demand for housing and commercial space in the area.

Finally, it is our understanding that the massive overdevelopment is intended to recoup the $750 million cost of the new SFM. The Glebe Society believed it would have been better to rebuild the SFM on the current site. The vendors at the SFM objected to having the Market rebuilt while they continued trading. We lost that fight, but we do not believe Glebe and Pyrmont should have to pay the price of the recalcitrance of the Market vendors, and the ambitions of the state's tourism industry.

RECOMMENDATION 11: The cost of construction of the new Sydney Fish Market should be shared between the State Government and the industries that expect to benefit from it. It should not be earned from the over development of the current Fish Market site.

CONCLUSION

The Plan asserts that the buildings will be tested by principles of good design. This is fallacious. The building envelopes in the planning process are too dense and too tall.

Good design is about considering all the elements, including impact of the neighbouring buildings, ameliorating the gash of the Western Distributor and managing scale, sunlight, amenity, open space and the foreshore walk.

This proposal is primarily driven by density. The scheme is fatally flawed because it starts with bad design. It is misleading to claim that a bad plan can be rectified by a design code. It cannot.

The Blackwattle Bay State Significant Project, Statement of Intended Effect claims that *the overall design of the Blackwattle Bay Precinct Plan delivers a diverse, welcoming and inclusive place, and stays true to the essence of Pyrmont as an eclectic, vibrant and unique neighbourhood.* Even in the age of spin it is rare to encounter such a huge disjunction between claims and reality.

APPENDIX 1

The plan lists 16 guiding principles (BBSSPS page xiii). How does the proposal stack up against its sixteen guiding principles?

Principle 1: Improve access to Blackwattle Bay, the foreshore and water activities for all users.

It fails.

By cutting off vistas of the Bay instead of opening them up it reduces access. The promenade is not wide enough.

Principle 2: Minimise additional shadowing to Wentworth Park and Glebe Foreshore (in mid-winter) and create new places with comfortable conditions for people to enjoy.

It fails.

The tall buildings proposed will cause overshadowing.

Principle 4: Prioritise movement by walking, cycling and public transport.

It fails.

A priority should be to use clever design to ameliorate the impact of the Western Distributor and enhance the experience of pedestrians walking from the city and Pyrmont.

Principle 6: Link the Blackwattle Bay precinct to the City, Glebe Island and White Bay and other surrounding communities and attractors.

It fails.

The promenade is not wide enough.

Principle 7: Mandate Design Excellence in the public and private domain.

It fails.

The building form is too dense. Starting with bad design is not mandating design excellence.

Principle 8: Integrate housing, employment and mixed uses to create a vibrant, walkable, mixed-use precinct on the city's edge.

It fails.

More affordable housing is needed. It is not clear from the studies that the commercial uses will be vibrant or viable.

Principle 9: Maintain and enhance water uses and activities.

It fails.

No proper consideration has been given to the continued use of the Bay for rowing. This is threatened by unplanned introduction of other uses. The Bay houses Sydney's third oldest

rowing club. There is a living heritage of rowing on Blackwattle Bay stretching back almost 150 years. This must be respected.

Principle 11: A place for everyone that is inviting, unique in character, socially inclusive and affordable.

It fails.

The overdevelopment is not inviting. Burying the harbour's edge in a mountain of masonry does not respect character, Many of the apartments will have unacceptable levels of noise and air pollution. There is an inadequate amount of affordable housing.

Principle 12: Expand the range of recreational, community and cultural facilities.

Unclear.

Principle 13: Plan for the future community's education, health, social and cultural needs.

Unclear.

Principle 14: Deliver development that is economically, socially, culturally and environmentally viable.

It fails.

The development does not respect the landscape or the character of Pyrmont. The lower floors adjacent to the Western Distributor will suffer noise and air pollution. Only 70% of apartments have adequate solar access.

Principle 15: Embed and interpret the morphology, heritage and culture of the site to create an authentic and site responsive place.

It fails. Heritage is about the tangible. In the case of Blackwattle Bay and the Pyrmont Peninsula, caring for heritage is about respecting the land and its topography, not burying it in a mountain of masonry and exacerbating, rather than ameliorating, the impact of the Western Distributor.

The Blackwattle Bay Precinct Study identifies "the need to better represent and engage knowledge and values of First Nations" (p. 99), and says the precinct should "celebrate the cultural importance of Blackwattle Bay to the Wangal and Gadigal people". The stories of the traditional owners' connections with the land will be richer if the topography remains legible.

Principle 16: Foster social and cultural understanding and respect to heal and grow relationships.

It fails.

In the community consultation process in 2020 the public were presented with three schemes all of which involved very dense development. Information was scanty on how important things such as reconnecting Blackwattle Bay to the Pyrmont peninsula would be achieved. This felt like a pseudo consultation done as a box ticking exercise and not based on respect.

APPENDIX 2

To help guide the project the following nine objectives were developed having regard to consultation undertaken with the community and stakeholders since 2014 (BBSSPS p.9).

Objective 1: Deliver a new retail and wholesale fish market at the head of Blackwattle Bay that is one of global Sydney's key tourist attractions

Fails to realise its potential.

The new Fish Market will be a more successful tourist attraction if it is in an attractive setting, not adjoining a massive overdevelopment which abuts a gloomy flyover.

Objective 2: Deliver a continuous foreshore promenade connecting Glebe foreshore to Pyrmont, which is activated, connected and resilient

It fails.

Resilient means being wide enough to accommodate its users. What is proposed is not fit for the purpose.

Objective 3: Design and deliver a high-quality public domain that links Blackwattle Bay to the foreshore and Wentworth Park and integrates with the wider public domain

It fails.

It does not integrate with Pyrmont and the height of the buildings are intrusive.

Objective 6: Deliver housing affordability and diversity consistent with government policy – Towards our Greater Sydney 2056 and the Eastern City District Plan

It fails.

There is very little affordable housing provided and no public housing.

Objective 8: Provide social infrastructure including recreation and open space to support the overall population needs

It fails.

Too many buildings and not enough open space.

Objective 9: Optimise financial and economic benefits to NSW.

It fails.

In the knowledge-based economies of the 21st century liveability and attractiveness are key factors which attract innovators and entrepreneurs. The plan fails to capitalise on the opportunities offered by its setting to improve the western edge of the Pyrmont peninsula. It is very second rate and uninspiring.

162931

Durman

8C/2 Bowman Street Pyrmont 2009

PDF File submitted

Reply to Blackwattle Bay State Significant Site Study By

C.P Durman
8C/2 Bowman Street
Pyrmont 2009
Email; chris@keydex.com.au

1. Cramming people into an already very heavily populated area will only create a future ghetto. I am not against development, I think the area does need redevelopment however there is huge differences between what is proposed and what would be good development. I believe good development would be towers of 20 stories and no blockage of Blackwattle Bay views. I like the boardwalk around the bay. The development proposed is just too big and it's just an attempt to get the most money possible from the sale of the land.
2. The consultation on this project has been more about what Planning NSW intends to do rather than any constructive dialogue. There should have been honest feedback to the original request for input, this seems to have just been ignored.
3. Your air pollution testing has not taken into account the proposed new concrete plant on Glebe Island, nor the MUF on Glebe Island or the unloading of product from ships at Glebe Island 1 and 2, expected to be 24/7 operation. These facilities will also be using thousands of heavy trucks every day. Your plan admits that air quality standards could be exceeded even without taking the above into account. The extra traffic caused by Westconnex also needs to be assessed.
4. The buildings now owned by EJC Pyrmont and Australian Fishing Industries should have height limits restricted so that views of Blackwattle Bay from the approaches to the Anzac bridge are not interfered with. Otherwise you get the problem, like where the views of Darling Harbour have been blocked from the Western Distributor.
5. Traffic getting on to the Anzac Bridge from Pyrmont at peak hours can take up to half an hour, this development will only make it worse.
6. Parking at the New Fish Markets is to be 417 spaces exactly the same as the old fish markets yet visitors are expected to rise by 3 times. Not all will use public transport. I suggest that this will create a huge parking problem in all surrounding areas.
7. Shadowing is already a problem in Pyrmont, take Bank Street as an example. It is quite overshadowed and cold at most times of the day by the Western Distributor and buildings. Your 45meter towers will add to this problem.
8. Wind tunnels. Our building on the corner of Bank and Bowman Streets has a huge wind tunnel effect with the wind from certain directions roaring between us and the buildings on the other side of the road. This would no doubt be a result of the towers being built.
9. You mention a temporary marina in Bank Street yet you do not show it on any of the diagrams or maps. This is the new Blackwattle Bay Marina and has been in existence for some time and would hardly be described as temporary containing some 20 commercial vessels and expected to be there for 50 years.
10. Mention is made of the Old Glebe Island Bridge, however this is outside the study area and should not be discussed. Since it has been discussed I would like to point out a few facts, There is an exact example of this bridge 1 kilometre away (Pyrmont Bridge) we do not need to preserve two, the cost involved in keeping a full time crew to open and close it would be

$2,000,000 per annum plus maintenance $2,000,000 per annum and an upgrade to get it into working order $40,000,000. Money far better spent on our schools or hospitals.

11. The Bays should be treated as a whole zone instead of splitting it into four or five areas. Without treating it as a whole mistakes are being made such as Hanson cement plant and the MUF.
12. Cramming people into an already very heavily populated area will only create a future ghetto. I am not against development, I think the area does need redevelopment however there is huge differences between what is proposed and what would be good development. I believe good development would be towers of 20 stories and no blockage of Blackwattle Bay views. I like the boardwalk around the bay. The development proposed is just too big and it's just an attempt to get the most money possible from the sale of the land.
13. Rezoning. It appears any time the Government wants to achieve their aim and not necessarily those of current residents they resort to new legislation, what's the point of a plan when it is so easily overridden?
14. When doing these SSP studies both sides of an argument should be put up, flowery words with endless one sided studies should not be the order of the day. Just look at the fanciful picture on the brochure Infrastructure NSW put out advertising their information sessions, which again will be a diatribe of what they intend to do rather than any consultation.
15. Your study mentions "innovative corridor". This term is used in every study and is tired and never turns out to be true. Double speak.
16. Why can't we have fewer storeys on the towers? Don't we want decentralisation? If we build fewer residences it will only help decentralisation. After Covid is there going to be as much demand for city based employees?

182521

Dyer

2009

Submission on behalf of Sydney Fish Market Pty Ltd.

20 August 2021

Department of Planning, Industry and Environment
Blackwattle Bay Redevelopment Submission
Locked Bag 5022
Parramatta NSW 2124

Via: https://www.planningportal.nsw.gov.au/blackwattlebay

Dear Sir/Madam,

Submission: Blackwattle Bay Redevelopment (State Significant Precinct Study)

I write to you in my capacity as Chief Executive Officer of the Sydney Fish Market Pty Ltd. Sydney Fish Market is the largest investor, employer, and a major tourist attraction within the Blackwattle Way Precinct. This letter has been prepared in response to the material relating to the Blackwattle Bay State Significant Precinct Study, currently on exhibition until 20th August 2021.

Significantly, Sydney Fish Market has been for generations one of the State's most important operations and one of the world's largest Fish Markets. The existing Sydney Fish Market is the largest market of its kind in the Southern Hemisphere and the third-largest seafood market, in terms of variety traded, in the world. It sources product from NSW, nationally and from abroad and trades over 13,500 tonnes of seafood and 400 species annually.

A critical part of Blackwattle Bay's revitalisation and the vision for the Precinct, will undoubtedly be the centrepiece to be created by the NSW Government's decision to relocate Sydney Fish Market from our existing site on Bank Street, to the head of Blackwattle Bay. The relocation has been approved through a State Significant Development Application process, determined in June, 2020. This transformational project will be one of the largest public investments anywhere along Sydney Harbour, representing an investment of over $1 billion, including the land, the new building, and the facilities to be created adjacent. The new market will be a significant contributor to the NSW economy, supporting local employment and industry throughout NSW.

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Sydney Fish Market remains in favour of the proposed Blackwattle Bay Redevelopment and of its State Significant Precinct status. We are strongly in favour of renewal within the Precinct. We are also keen to see future residential; mixed uses; new public open spaces and the new planned waterfront promenade along the Harbour, all developed for the use and enjoyment of all. Our support is qualified, however, by the caveat that any future plans for the redevelopment of the Precinct need to ensure that there will not be any impact on any of the current or future operational needs of Sydney Fish Market.

To that end, we wish to emphasis two very important aspects in our response to the exhibited Blackwattle Bay Precinct Study. These are outlined below:

1. Sydney Fish Market Operations to be Fully Maintained

Sydney Fish Market runs a 24/7 operation and it is imperative for that to continue, if it is to perform its functions adequately and professionally. Its operation is complex and multidimensional, especially because it includes purpose-built wharf operations (which may need to be expanded). There are fishing trapper and trawler vessels which also need to come through at various times of the night, generating some noise and odour, and requiring considerable logistical connectivity. There are critical car and large truck movements at all times of the day and night. These are all necessary parts of a busy, fully operational and efficient Fish Market.

It is important to ensure therefore, that any new development approved at Blackwattle Bay, does not become a platform for objection to any of the Market's necessary current or future operations, as these remain imperative to its ongoing functioning. This will be important to note, particularly for any new residential or commercial ownerships or tenancies in the Precinct.

Another important aspect to note, is that Sydney Fish Market will increasingly be a significant tourist attraction and is forecast to generate an additional 1.9 million visits within the first year of operation, rising to a total visitation of over 6 million by 2026. These significant numbers are currently being accommodated in the design of the market, together with general amenities and visitor parking. Whilst planning of all these aspects will be further advanced in the coming months to ensure great civic outcomes, we are concerned about the ability of existing or future neighbours who may wish to object or hinder our operations in various ways. The Market's free and complete functioning must be fully maintained as a core deliverable for both Sydney Fish Market and the

Precinct, without limitation on our ability to provide a major tourist attraction for local, interstate, and overseas visitors.

A possible approach might be to place caveats on Property Titles (that may or may not also be registered on the Section 10.2 Planning Certificates). These would clearly show to any prospective purchaser or tenant or lessee of any neighbouring residential, commercial, or retail space or premises, the hierarchical importance of Sydney Fish Market in this setting. We understand that this arrangement has worked elsewhere along waterfronts in Sydney and elsewhere, including East Circular Quay where there is a 24/7 operation, as well as public and private ferry operations in place. We also understand that there are many ameliorating measures, currently available to new owners, such as sound-insulated doors; double glazing; sound absorbing construction material, that have already been employed in several places, to counteract the impacts on future residents and occupiers. In summary, future owners and occupiers must be put on effective and real notice that they have no opportunity to object to the normal operations of the Market and its ancillary operations as a destination for significant visitation and events.

2. Allowance for Future Expansion of Sydney Fish Market

Also, given the current success of Sydney Fish Market and its likely future success, as well as the relocation to a new world-class premises, sufficient consideration must be given, both physically and in planning terms, for Sydney Fish Market to expand its operations in the future. Sufficient provisions should be made now, for expansion of Sydney Fish Market in the decades to come.

The new building, with an investment of $750 million, is an expensive construction and the relocation process is onerous and difficult and is unlikely to be repeated. This necessarily means that strong consideration must be given now as to how the Fish Market can expand successfully into the future with minimal impact on its surrounds. Consideration must also be given as to how its 24/7 operation can continue under such an expansion. It is of critical importance for such an important, iconic and essential facility for both Sydney and NSW, that its revenue model is not permitted to be impacted by planning constraints in decades to come.

Suggested Solutions

In considering future anticipated challenges, both during the planning process and into the operational phase of the Fish Market, we wish to outline the following significant points for full consideration.

1.1 - Planning and Legislative Considerations

1.1.1 - Zoning Categorisation

The current suggested zoning for the Site is SP1- Special Activities (Sydney Fish Market) which will be incorporated within the Sydney Local Environmental Plan 2012. This zoning would suit the Fish Market operation, provided that all intended current and future uses, including those identified in the State Significant Development Approval, are made permissible within the SP1- Special Activities (Sydney Fish Market) Zoning. This is obviously imperative.

Also, given that the current plan zoning and Masterplan will need to serve the needs of the market for more than 50 years, we feel that it is necessary that the proposed zoning of SP1- Special Activities (Sydney Fish Market), incorporate as permissible uses the following land uses: Retail Premises and Wholesale Operations; Commercial Premises; Educational Establishments; Community Facilities; Entertainment and Event Facilities; Carparking; Recreation Facilities (indoor and outdoor); Function Centre; Tourist Accommodation; Food and Drink Premises; and Roads.

Whilst not all of the above uses are currently facilitated in the efficient operation of Sydney Fish Market today, they will become imperative in the future. Sydney Fish Market must serve the needs of Sydney for the next half a century. We therefore strongly request that all the above land uses, be included as permissible uses within the SP1- Special Activities (Sydney Fish Market) Zone.

In regard to determinations of applications, we are agreeable to the $10 million threshold for determination by the City of Sydney Council. If imposed, however, we would like to be consulted in reviewing this limit upwards or downwards, should approval times for the 24/7 Fish Market operation, be impeded or hindered by future planning processes. This is imperative in the interest of making our operation as responsive and efficient as possible.

1.1.2 - Expansion of Exempt and Complying Provisions

We believe that for the efficient operation of Sydney Fish Market to continue, the Exempt and Complying Development provisions of the State Significant Precinct provisions, should be expanded in the SP1- Special Activities (Sydney Fish Market) Zone.

One important area of operational timeframe efficiency that we see, would be the ability of one operating business, associated with the Fish Market, to replace another without the need for a Development Application, provided it is a similar operation or substantially similar use. This would save on both costs and time and help operations to remain continuous at the Fish Market. In more detail, our suggested amendments to the Exempt and Complying Provisions of the SP1 – Special Activities (Sydney Fish Market) Zone, may be set out as follows:

1. The Exempt and Complying Development criteria should be expanded to include change of business or retail operator, provided that the new use is substantially the same as the previous use. It is important that a new Development Application is not necessitated, for every change in commercial tenancy. This would also cut down processing times for both the Council and the Department. Ideally for a more exacting solution, all such uses should be classified as Exempt Development.
2. Restaurants and food facilities, that frequently change tenancies, that are connected to the Fish Market, should also have such activities classified as Exempt and Complying Development.
3. All fit outs that are connected to Sydney Fish Market directly, or connected through its own operations and retail and restaurant tenancies, should be designated as Exempt and Complying Development therefore, not requiring a Development Application, regardless of the value of the Works.
4. External paving, seating, shading structures, landscaping, awnings, wayfinding and business identification signage, that is below $1 million in value, should also be made Exempt and Complying Development, provided that it is done by or on behalf of Sydney Fish Market.
5. Live entertainment; performances and art displays should also not require individual Development Consent.

1.2 - Retail Size, Mix and Selection in Blackwattle Bay Precinct

Whilst we remain strongly in favour of open market competition and a larger retail offering to visitors, we would like to retain the right to be consulted about all new retail facilities in the Precinct, in case these either replicate unnecessarily, or have a deleterious impact on the ability of the Market to perform its functions at the level of excellence expected.

1.3 - Design and Planning Considerations

Given that Sydney Fish Market's operation will physically move approximately 500 metres from Bank Street to the head of Blackwattle Bay, we would like to draw your attention to our sensitivity that this be done carefully and properly and that it must have the interest our operational efficiency, in mind. To that end we offer the following points:

1. That the new uses envisaged for the new site be associated with the old Fish Market site, to facilitate both current and future operations of Sydney Fish Market.
2. That architectural excellence be required in the planning process, together with subsequent monitoring of delivery throughout construction, of any and all built forms within the Precinct so as to complement the architectural excellence of the new Sydney Fish Market building.
3. That the interface between the old site and the new site, be done in a way that is beautiful, tasteful, safe and in order to provide a suitable entrance to the new market. We are an important "Gateway Site", and we must be treated architecturally and functionally as such. This is in the interest of the State, our visitors as well as Sydney Fish Market. It will also help give the whole Precinct a stronger sense of place and destination.
4. In regard to the potential shadowing of existing and new Public Spaces, Sydney Fish Market submits that current controls should be fully adhered to in the interest of good amenity.
5. We require excellent access and amenity for all public spaces, both within our premises and in the areas surrounding it. We would submit strongly that existing statutory controls should apply, in the interest of good amenity, in relation to the old and new planned parks within the precinct.

Of course, all future built-form that is residential, would need to adhere to *State Environmental Planning Policy No. 65- Design Quality of Residential Flat Development* and the associated *Apartment Design Guide*, and we think that this is absolutely appropriate in addition to the design excellence processes mentioned previously.

1.4 - Considerations during the Construction Phase

We wish to also to make clear that it is imperative that all operations of the current Sydney Fish Market must remain uninterrupted during both the construction phase of the new Market, and any other construction or external works that may be performed in the short to medium term at Blackwattle Bay. Our activities are highly contingent on operational efficiencies, low level of impediments and speed to market.

1.5 - Operational and Access Considerations

Given the complexity of the Fish Market as a large logistical operation, traffic, parking and pedestrian access are all points worthy of detailed consideration. All these will become even more complex in the new expanded premises but if planned for in this phase, can be accommodated successfully both on and off-site. The main points of significance, in this regard, are summarised below:

1.5.1 - On-Site Parking and Private Vehicle Provision

Sydney Fish Market encompasses a large and expanding logistical operation. This will become even more complex in the new expanded premises, which will also be accommodating, an ever-increasing number of tourists, patrons, and visitors. Therefore, it is imperative that due consideration be given now, at the planning phases, for sufficient parking within the precinct which must not compromise the parking facilities available to the Sydney Fish Market. Precinct wide parking arrangements need to be planned as each additional development occurs, including time-limits and other mechanisms to properly manage the precinct's parking needs.

Car access and parking at the Sydney Fish Market will always remain an important element of our operations, as consumers require the convenience of on-site parking to assist them with heavy loads of product.

1.5.2 - Public Transport Options and Pedestrian Access

Public transport access for staff and visitors also remains essential. This will be assisted by major transport links, either existing or planned, for the Blackwattle Bay Precinct. These are set out below:

Light Rail

The site is currently well serviced by Light Rail, with a designated Fish Market stop that is only 100 metres from the Site. This will continue to be an excellent option for visitors and many inner west and city patrons, that are currently able to access the Light Rail network.

Metro Rail

Sizeable government investment is planned for a new Metro Rail station within the precinct. This needs to be within a 5-minute walk from Sydney Fish Market. The Metro, from our perspective, is a very welcome initiative, as it will serve the dual benefits of creating rail access to the Precinct, as well as having stronger transit-oriented development outcomes at Blackwattle Bay. Given that the size of NSW Government investment in each new Metro station will be significant, it is extremely important that Sydney Fish Market is properly integrated into this transport outcome in order to maximise the benefits of that investment. Provided the nearby station is planned with appropriate connections to the new market, the number of visitors and tourists to the Market will be greatly increased and their experience enhanced, once the Metro is delivered.

It is imperative that strong pedestrian and cyclist connections to Sydney Fish Market from the proposed new Metro station at Pyrmont are planned and built.

Pedestrian Access

Sydney Fish Market is committed to maintaining high standards of visitor experience across the Site. Exceptional pedestrian access is core to that experience. We welcome the new public promenade along the foreshore and public plaza areas as part of the plan, ensuring that the needs of the many locals and the large number of visitors that will frequent the Fish Market on-foot are met. It will also serve as a wonderful tourist experience for the many millions of others who will come to Sydney Fish Market, simply as a tourist destination.

Ferry Services

Sydney Fish Market does not currently have Ferry Access arrangements to and from the Site. We understand that a future ferry route is planned for Sydney Fish Market and believe this to be a crucial part of the total transport plan for the precinct.

Conclusion

The new Sydney Fish Market will be the major landmark feature of the emerging Blackwattle Bay State Significant Precinct and will serve as a world-class destination and a hugely important community facility. It will have incredible functionality and architectural excellence – features which need to be supported and enhanced by the broader planning for the Precinct. If done well, Sydney Fish Market and the Blackwattle Bay State Significant Precinct will command their place as a major tourist destination along Sydney Harbour for generations to come.

We thank you for considering our submission and look forward to positive discussions about the future of our Site and the entire Blackwattle Bay Precinct.

Yours faithfully,

Greg Dyer
Chief Executive Officer
Sydney Fish Market Pty Ltd.

182091

Eginton

Glebe

The submission is in the attached file.

Response to the Blackwattle Bay SSP Plan

This proposal for the Blackwattle Bay site is an affront to the residents of Glebe (one half of Blackwattle Bay), Pyrmont, Rozelle, Annandale and Broadway as outlined in the points below.

Height and Density

The height and density of the proposed towers, ranging from 18 storeys to 45 storeys, is not justified by any reasonable argument on any urban design criteria whatsoever. Rather, the height and density appear to be based on financial development return targets that *remain hidden from the public*.

In the absence of this information - one can only speculate the resultant density is due to a requirement to cover the cost of the new fish markets development - on top of usual development returns – resulting in the outrageous density and height proposed.

Sixteen Principles purport to underpin the proposal. Principle 14 states 'Deliver development that is economically, socially, culturally and environmentally viable'. This is the only principle that is used to justify height – i.e., *"development that is economically…viable"* - no other of the 16 principles support the height proposed.

The density and height are ludicrously justified by shamelessly "cherry picking" the tallest parts of the Sydney CBD and Pyrmont (real and imagined), while totally ignoring the existing predominant height and scale of the surrounding context:

1. Blackwattle Bay is ONE place. It must be considered in its totality in terms of height, scale and density. The scale of Blackwattle Bay on the Glebe side is ONE and TWO storeys. The scale of the proposed new fish markets is approximately equal to a four storey residential development. The proposal totally fails to acknowledge the scale and heights of development fronting Blackwattle Bay – existing and proposed. **It fails to propose any reasonable contextual fit to the totality of Blackwattle Bay.**

2. Wattle Street is a significant street wall on approach to the site from the south. Its presence extends across the whole of Wentworth Park to the Glebe escarpment, and from Broadway to Blackwattle Bay itself. **The total scale and height of the development should not exceed the street wall of Wattle Street. It is a fundamental height benchmark.**

3. Recent development to the south of Blackwattle Bay and adjacent Wentworth Park sets heights at 8 to 10 stories. There is a direct relationship across Wentworth Park between these two development sites. **This scale relationship across Wentworth Park is totally ignored.**

4. The predominant scale of Pyrmont from the Harris Street ridge line to the Blackwattle Bay foreshore is generally a mix of 2 to 8 stories. The predominant morphology has 'built-form' following 'landform' from ridge line to foreshore. This is a fundamental and critical feature of the Pyrmont Peninsula as viewed from Blackwattle Bay, Rozelle Bay and Wentworth Park. **The proposal totally ignores this critical broad topographical and overarching scale feature.**

5. Distillery Hill is a hill. It is one of two high points on the Pyrmont Peninsula. Hence, height is appropriately located on the hill - reinforcing the topography of the peninsula. The proposal seeks to use the height at Distillery Hill as justification for height on the low foreshore of Blackwattle Bay. **This justification is wholly erroneous and refuted.**

6. The proposal seeks to justify height by claims to be consistent with the Pyrmont Peninsula Place Strategy. The Pyrmont Peninsula Place Strategy is opposed. The proposal takes the tallest heights

proposed by the Place Strategy and inappropriately translates these heights to the Blackwattle Bay foreshore. **This justification is wholly erroneous and refuted**.

7. The proposal makes selective reference to heights within the Sydney CBD and Cockle Bay, as further justification for the translation of this height to the Blackwattle Bay foreshore. The proposal does not 'link Blackwattle Bay precinct to the city' (Principle 6) but rather the towers create a visual wall to the city. This wall can be seen clearly in the 3D model of proposed massing in the SSP Study and height in context diagrams.
This justification is wholly erroneous, refuted and is simply nonsense.

8. The Sydney Harbour SHREP states 'development that is visible from the waterways or foreshores is to *maintain, protect and enhance the unique visual qualities* of Sydney Harbour'. In relation to the SHREP the proposal fails to acknowledge the scale of development, and further - fails to *justify* the scale of the development in relation to the Sydney Harbour SHREP. The requirements of the Sydney Harbour SHREP are NOT actually addressed by this proposal – particularly in relation to height. In effect, it is a fundamental and radical change to the character of Sydney Harbour.
The proposal is at odds with the objectives of the SHREP.

9. The proposed Design and Place SEPP objectives are simply restated. The proposal states total compliance with these objectives. The proposal fails to rigorously assess the proposal against the objectives of the SEPP – particularly in relation to height and density.
The proposal is at odds with the objectives of the proposed Design and Place SEPP.

Other Matters

Overshadowing of the Public Domain

The proposal appears to deliberately obfuscate the overshadowing impacts of the scale of the development on the public domain. The scale and height of the development is immediately north of the proposed public open space on the site, the public open space of the proposed fish markets, as well as Wentworth Park.

The impact of overshadowing during the middle of the day and, in particular, during winter months, is unacceptably high. Extraordinarily the new fish markets will be in shadow in the morning hours – just when people are there buying fish. This undermines the NSW Government's own investment. The impacts of over shadowing of Pyrmont itself, particularly during winter afternoons, appears untested.

The impacts on the public domain of overshadowing are extensive, significant and ill-considered. Solar amenity within public spaces should be a driver of shadow planes that set development form and heights. **The proposal fails to establish the logic of solar access to public spaces but is rather confused and ad-hoc – revealing it has never been a serious consideration.**

Traffic Generation

The proposal suggests 5,600 jobs and 1550 dwellings to be accommodated on the site. It is unclear how these targets were arrived at. The density proposed ordinarily represents significant traffic generation. This will be additional to traffic generation proposed by the new fish markets development.

Movement of traffic into and out of the site is extremely limited with little diversification of traffic possible. Traffic modelling may suggest intersections are at, or beyond, capacity.

The site has very good proximity to the light rail, an on-demand ferry service, as well as easy active transport movement to the CBD across Pyrmont Bridge. Given this, the modal-split assumption for all uses should be ambitious. **Residential uses should include diminished car parking rates consistent with or better than a transport oriented development.**

The Water of Blackwattle Bay

The proposal includes the reduction of water area of Blackwattle Bay by 2ha from 23ha to 21ha. The 2 ha 'loss' being used for a series of new extensive marina structures along the foreshore.

The proposed foreshore walk will not be so much a walk along a foreshore as a walk along a marina. It is inconsistent with the character of Blackwattle Bay. It is contrary to the objectives of the Sydney Harbour SHREP.
The extent and density of this marina development is unacceptable.

Blackwattle Bay has been used historically for paddle craft; this use continues today. Sydney University Rowing Club, the historic Glebe Rowing Club and the Dragon Boating fraternity are located on Blackwattle Bay and are daily users of Blackwattle Bay for rowing and paddling. Additionally, there is very significant use of the Bay for casual paddlers and rowers. **The introduction of additional motorboat craft will undermine the safe use of the bay by these current users.**

In its current form the proposed plan is totally unacceptable, particularly regarding the proposed height and density of the development. Anecdotally, the objections raised in this document, reflect the views of the whole Glebe community.

182471

Giddens

Pyrmont 2009

Tribal Warrior Aboriginal Corporation and Blackwattle Bay Marine.

Please see attached submission with supporting documents. We have focused our submission on the maritime use of Blackwattle and Rozelle bays along with 5-11 Bank St and Lot 26 Bank St. We have not commented on the new fishmarket.

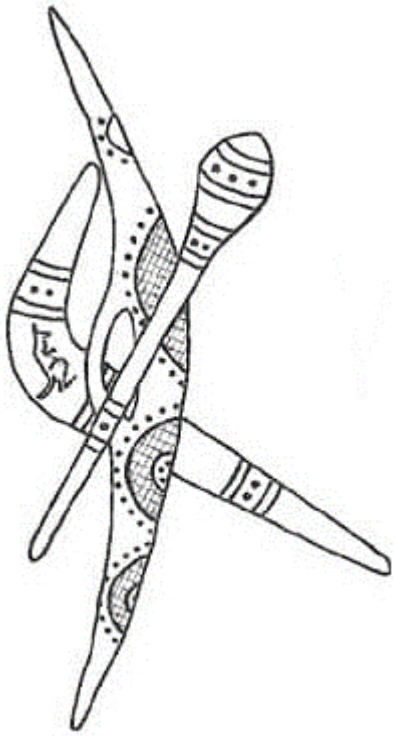
Blackwattle Bay Precinct

SSP STUDY SUBMISSION

Joint Presentation By

By **TRIBAL WARRIOR ABORIGINAL CORPORATION**

And BLACKWATTLE BAY MARINE GROUP



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1. STAKEHOLDERS AND TOURIST OPERATORS at Marina 37 Bank St Pyrmont
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   a) Dragon Boat Safety and Public Park and Pay Launching Ramp
   b) Public Foreshore Access and Promenade
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   d) Tourism and Visitor Hub – Ferry to Light Rail
      Aboriginal Culture Centre linked to Western Research Techniques etc.

   Note: The above comments have specifically been concentrated on Bank St, Lots 5-11 to Lot 26

5. HISTORIC REFERENCE MATERIAL

FOOTNOTE

- SUBMISSION PARTNERS APPLIED to join the FISH MARKET COMMUNITY CONSULTATIVE COMMITTEE, however this is pending
- FURTHER DETAILED PLANS AND SKECHES AS DEVELOPED BY THE ABOVE PARTNERSHIP HAVE NOT BEEN INCLUDED, AS OUR INTELLECTUAL PROPERTY CANNOT BE TREATED AS COMMERCIAL IN CONFIDENCE IN THIS PRESENTATION.

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1. STAKEHOLDERS AND TOURIST OPERATORS

STAKEHOLDERS AND TOURIST OPERATORS AT MARINA 37 BANK ST PYRMONT				**July, 2021**
Stakeholder	**Boat**	**Boat**	**Boat**	**Boat**
The Yacht Pty Ltd	Hilani			
CNN Cruises Pty Ltd	Harbour Spirit			
Vagabond Cruises Pty Ltd	Vagabond Spirit	Vagabond Princess	Vagabond Star	
Sydney Princess Cruises Pty Ltd	Jerry Bailey	Sydney	Ocean Blue	
Sydney Charter boat Pty Ltd	Eclipse			
Affinity Superyacht Pty Ltd	Affinity			
Sea Sydney Harbour Pty Ltd	Kirralee	Nevaeh		
Sydney Harbour Attractions Pty Ltd	Platinum	Tornado	Lightning	Harbour Jet
Sydney Pearl Cruises Pty Ltd	Sydney Pearl			
Luxe Cruising Group Pty Ltd	Sydney Glass Island			
Aqua Entertainemnt Pty Ltd	The Island	Halftide	The Ferry	
Raes Yacht Charter Pty Ltd	Sea Raes			
Pyrmont Heritage boating Club	Workshop			
Tafe NSW	Training room			
Queensland Sail Training	South Passage			
Tribal Warrior Aboriginal Corporation	Training Room	Mari nawi	Kai Lag	Lithgow
Blackwattle Bay Marine - Marina Administration		Work vessel Indpac 7	Workpunt 3	
Lady Northcott for refit by Tribal Warrior Aboriginal corporation - Pending TfNSW final approval				

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And BLACKWATTLE BAY MARINE GROUP

2. JOINT SUBMISSION PARTNERS PERSONNEL

TRIBAL WARRIOR ABORIGINAL CORPORATION

Mr Mark Spinks – Chairman

Mr Shane Phillips – CEO

Mr Rick Rossiter – Corporation Secretary

Mrs Marie Hiles – Operations and Tourism Manager

BLACKWATTLE BAY MARINE GROUP

Mr John W Giddens – Managing Director

Mr Colin Thwaites – Marina Manager

CONSULTANTS

Mr John Gillham – Events and Marketing

Mrs Suzanne Harris – Environmental Scientist

Mr John Kannane – Marine Biologist

Equinox – Architectural and Project Managers

Mr Neil Patchett – Boating Industry Association General Manager

Blackwattle Bay Precinct

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And BLACKWATTLE BAY MARINE GROUP

3. DETAILS OF SUBMISSION GROUPS MARITIME EXPERIENCE AND STRONG COMMUNITY LINKS

Award winning TRIBAL WARRIOR ABORIGINAL CORPORATION promotes life changing marine education of disadvantaged young people both indigenous and non indigenous.

BLACKWATTLE BAY MARINE has operated in the BAY for 28 years and provides free berthage and teaching areas for TRIBAL WARRIOR.

The Charter Vessel businesses and the two Maritime Agencies based at the Marina will continue to provide apprenticeships and employment for graduates for TRIBAL WARRIORS mentoring and training programs.

TRIBAL WARRIOR and BLACKWATTLE BAY MARINE have a proven record of successfully working together for over 20 years.

MR SHANE PHILLIPS - CEO. TRIBAL WARRIOR

- Co - Chair Empowered Communities Inner Sydney
- Department of Communities and Justice Advisory Board
- Westpac Indigenous Advisory Board
- Many Rivers Board member
- Australian Indigenous Aviation Foundation
- Australia Day Local Hero Award 2015

MR JOHN W GIDDENS – MANAGING DIRECTOR BLACKWATTLE BAY MARINE

- Established in Blackwattle Bay 1992
- Reactivated Seaplane Base, Rose Bay 200
- Sydney Harbour Maritime Forum Vice Chairman 7 years
- Blackwattle Bay reference group member, Sydney Harbour Foreshore Authority
- Member Marine User Group, Waterways Authority
- Boating Industry Association, 25 year member

Blackwattle Bay Precinct

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And BLACKWATTLE BAY MARINE GROUP

4. SUBMISSION COMMENTS IN RELATION TO SSP STUDY

a) DRAGON BOATS

Currently operating adjacent to marina at 5-11 Bank St should be relocated to the head of Rozelle Bay for Marine Safety 9col regs) reasons. With the future increase of powered vessels into the Bay, the clash between non powered (Dragon Boats) and pleasure boats will become a safety issue. The two rowing clubs on the Glebe shore are not a safety issue as their operating hours are very early morning and restricted predominantly to that shoreline prior to entering the designated Southern lane of Rozelle Bay.

Park and Pay Trailer Boat Launching Ramp

In 2002 following a submission and detailed drawings jointly from the Boating Industry Association and a Joint Venture partner Minister Costa (Ports and Waterways) publicly announced the commencement of this project. Through political lobbying the project was subsequently shelved.

There has not been a new launching ramp constructed on the southern shore of Port Jackson in over 45 years. A integrated pedestrian and landscaped area was proposed – layout included.

b) PUBLIC FORESHORE ACCESS AND PROMENADE

Since the publication of the 2006 Master Paln carried out by NSW Maritime and freehold property owners, there is concern by these owners as to the proposed set back dimensions from the existing seawall alignment.

Construction of a suspended pedestrian promenade will give the following benefits:

I. Maintain the value of individual lots by not reducing land area
II. Give a uniform appearance from the waterside with a low maintenance concrete deck and piles (similar to King St promenade Darling Harbour)

III. Currently (excluding the future Fishmarket site) there are 9 distinctly different seawall forms of construction in the Bay, the majority adjoin uncompacted land.

c) SHORTFALL OF CARPARKING AND LOW COST HOUSING

Due to the limitaions of private vehicles entering the CBD it warrants serious consideration to incorporating park and pay multi story facilities into future residential/commercial developments.

A self funding multi storey parking structure would be appropriate located in the near proximity of the current light rail station and any future transport hub. Lots 25 and/or Lot 26 Bank St are feasible sites.

With the expansion of Tribal Warrior Aboriginal Corporation, marine training and mentoring programmes, short term accomodation must be provided adjacent to any future facility.

d) TOURISM AND VISITOR HUB ABORIGINAL CULTURE CENTRE

A fundamental of tourist attraction, both internationally and locally, is the search for and enjoyment of a unique destination. The fulfilment and satisfaction felt is enriched by the cultural, recreational and working activities they see and feel during their visit. Their feeling of achievement from their search encourages them to promote the results of their visit to a range of contacts upon their return home. This is important to the continuing financial success and stability of the chosen location.

Sydney is blessed with a large number of renowned and attractive locations and iconic buildings. Blackwattle Bay has a long history of heavy industry, working vessels and maritime activity. With the possible exception of the fish markets, it would not be seen as a tourist or recreational area.

We understand the intention of the SSP study is to facilitate a plan to reach the objective of developing a vibrant waterfront locality which has appeal for tourism, recreation and community living. In consideration of the countless

appealing venues throughout Sydney and environs we believe the key to success for Blackwattle Bay is to establish a significant point of difference.

We believe this can be achieved by featuring the maritime and industrial heritage of Blackwattle Bay with appropriate modifications to existing maritime use to keep the spirit of the bay whilst achieving the appropriate mix necessary to meet the intention of the development project.

The installation of attractive strategically placed gardens, recreation areas and waterfront promenades can be designed to blend with and enhance the long and often colourful history of the Blackwattle Bay Precinct. The installation of permanent and short-term artwork with a strong maritime influence can be installed to lift the image and the uniqueness of the area and offer the opportunity for a range of regular artistic events.

<u>Indigenous Maritime Environmental and Scientific Research Centre</u>

The Tribal Warrior Aboriginal Corporation and Blackwattle Bay Marine have developed an exciting innovative plan to establish a research and educational centre to facilitate young aboriginal children to work with non-indigenous children in learning specialist skills in maritime understanding and environmental protection. This will be done by linking Aboriginal historic and cultural knowledge to western scientific research techniques. As the partners in this submission have many years of experience working together, we see that the perfect location for this would be at Blackwattle Bay.

The plan is to open the centre to the public with professionally managed experiments and exhibits with the opportunity to see and talk with the young people working together on various projects. This will not only help the young people build their self confidence and give them the opportunity to continue to higher education but it will become a major iconic feature of the Blackwattle Bay precinct with particular appeal to Australian and international travellers.

We would see this as an important opportunity for other school students to come in groups to learn about the maritime environment and Aboriginal environmental knowledge. Provision of convenient berthing with a working marina for Tribal Warrior and selected tourist vessels adjacent to the Centre will support educational on water tours for both tourists and visiting students.

Blackwattle Bay Precinct

SSP STUDY SUBMISSION

Joint Presentation By

By **TRIBAL WARRIOR ABORIGINAL CORPORATION**

And BLACKWATTLE BAY MARINE GROUP

Boating Industry Association

20 August 2021

Mr John W. Giddens
BLACKWATTLE BAY MARINE OPERATIVES PTY LTD
Mobile: +61 418 413 687
37 Bank Street, Pyrmont 2009
e., john_giddens@bigpond.com

Dear John,

I am writing regarding your proposal for improved boating infrastructure in Blackwattle Bay. Please pass this letter **To Whom it May Concern** regarding this matter.

The Boating Industry Association Ltd (BIA) is the peak body in Australia that represents the interests of recreational and light commercial boating. The boating economy generates significant social benefits through employment, much of which is supported by family businesses. In 2020 the industry reported a turnover of $7.95 billion, directly employed more than 25,320 people with more than 10,000 contractors. Seventy-five per cent are in small businesses, employing local workers and supporting local communities.

Boating is a way of life for many families and it is estimated that 2 million people in NSW participate in some form of boating each year. The vast majority occurs in family trailerable boats. With more than 20 per cent of Australians engaging in some form of boating activity, little wonder almost 1 in 5 households in a state such as NSW has a boat or watercraft.

Boating has proven to be a standout choice in leisure activity through the pandemic. The combination of no international travel, the staycation phenomenon, flexible work practices and the need to be COVID Safe have seen interest in getting out the water ramp up significantly.

It is essential governments consider how to provide new and improved infrastructure to support the public demand for safe and convenient access to our waterways.

For these reasons and more, the BIA supports your proposal to deliver a much-needed trailer boat launching facility near the heart of Sydney Harbour. Particularly as your proposal provides a safety outcome by making the western end of Rozelle Bay a preferred area for paddle craft. This is worth considering as it would put low-profile paddle craft in a safer and more protected location from which to base operations. This safety outcome would also be beneficial with the redevelopment of the Fishmarkets.

Yours sincerely,

Neil Patchett
Co General Manager
Boating Industry Association Ltd

PO Box 1204 Crows Nest NSW 1585 • T. (02) 9439 2077
Offices in: NSW • South Australia • Queensland
www.bia.org.au info@bia.org.au

Blackwattle Bay Precinct

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And BLACKWATTLE BAY MARINE GROUP

2002 Blackwattle Bay Boat Ramp Concept Drawing

Blackwattle Bay Precinct

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And BLACKWATTLE BAY MARINE GROUP

Tunks Park Boat Ramp, Northbridge

Blackwattle Bay Precinct

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And BLACKWATTLE BAY MARINE GROUP

5. HISTORICAL REFERENCE MATERIAL (PART OF LIBRARY LISTED)

1991 PYRMONT ULTIMO Precinct Planning Study
1992 CITYWEST DEVELOPMENT CORPORATION Economic Development in Pyrmont/Ultimo
1992 Amendments to Precinct Planning Study
1993 Bay Precinct – Questions and Answers
1993 Regional Environmental Plan No. 26 CityWest publication
1999 The Rolls Report – Study commissioned by Waterways Authority and Ports
1999 A Maritime Vision for Sydney Harbour – NSW Waterways/Sydney Harbour Marine Forum
2000 SREP No.26 – CityWest Amendment No.9
2000 Sewerage Pollution from vessels findings NSW Waterways
2000 Reclaiming the Glebe Foreshore – City of Sydney
2000 Vision and Strategic Program – Urban Affairs and Planning
2004 Sharing Sydney Harbour and Project 5 Tenure of Waterfront Operations – Sydney Harbour Maritime Forum
2001 Recreational Boating facilities – Waterways Authority
2001 Call for Expressions of Interest Blackwattle Bay – Waterways Authority
2001 Foreshore Promenade Pyrmont Peninsula and Blackwattle Bay. Sydney Harbour Foreshore Authority publication
2001 Sole conforming EOI by Blackwattle Bay Marine Operatives Pty Ltd on B2 site to Waterways Authority
2003 Sydney Fish Market Master Plan
2003 Integrated Land and Water Access Plan – Planning NSW in conjunction with Waterways Authority NSW and Sydney Harbour Maritime Forum
2005 Marinas and Social Demands – Paul J Robinson, Waterways Authority NSW
2006 Bank Street Master Plan

Additional Reports, Studies and Master plans are currently still on Public Record

164551

Gozzo

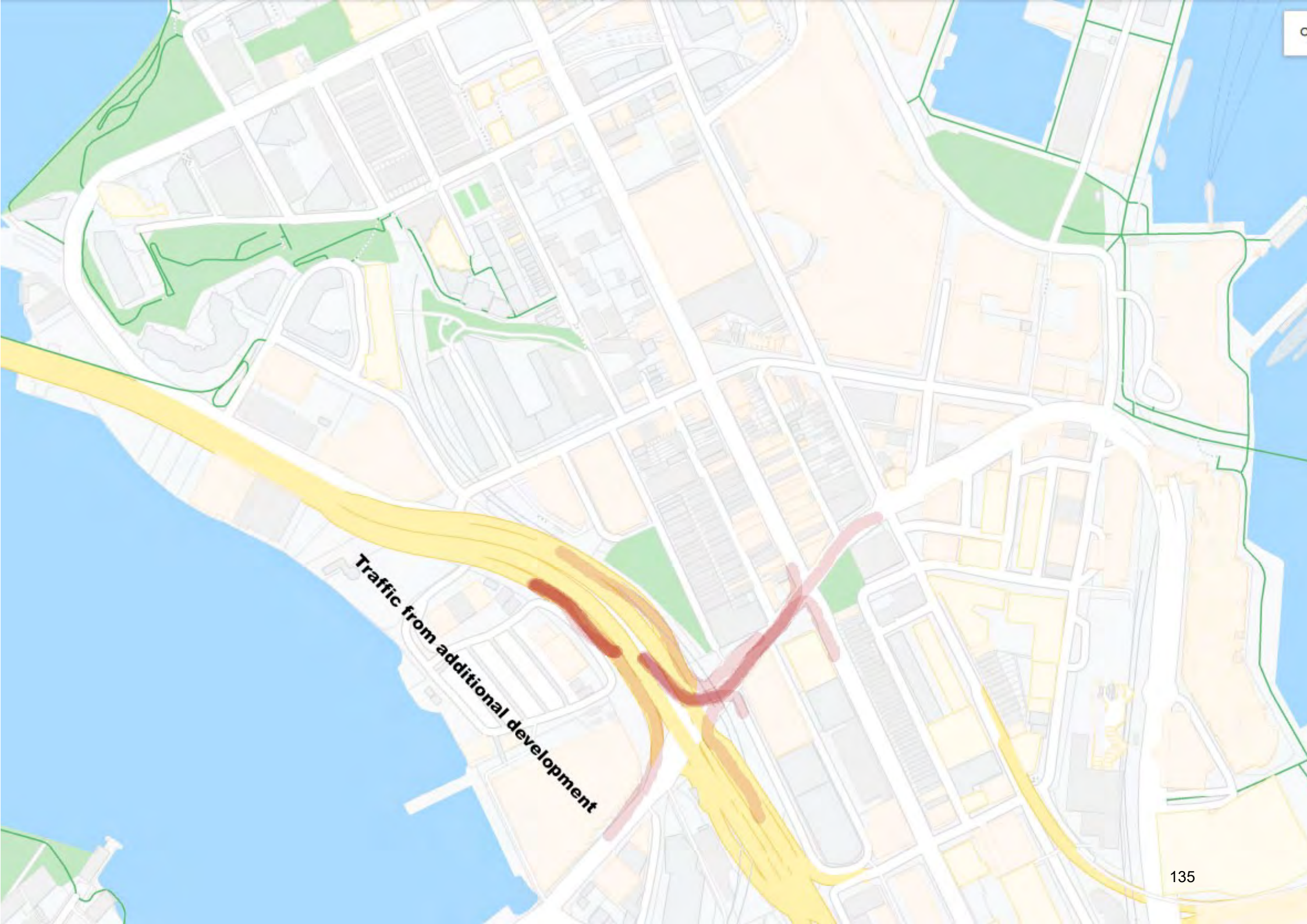
Pyrmont 2009

The proposed development is not adequate to the travel and traffic infrastructures the area currently has.

Having lived in Pyrmont for more than 8 years, I can guarantee that the additional traffic generated by the proposed development is unsustainable.

Already at peak time it takes over 40 minutes to "get out" of Pyrmont through the Anzac Bridge or Anzac Bridge road and the amount of people who would now have to use the same roads to get home would paralyze the area.

The proposed Metro won't solve this as there are still many areas of Sydney poorly connected and a big proportion of traffic is generated by vans and other delivery trucks.


Traffic from additional development

183366

Griffiths

Glebe

Please see attached letter.

20/08/2021

Department of Planning, Industry and Environment
Blackwattle Bay Redevelopment submission
Locked Bag 5022,
Parramatta NSW 2124

Via online portal

RE: Submission on Blackwattle Bay SSP

Thank you for the opportunity to provide a submission in response to the Blackwattle Bay State Significant Precinct (SSP) Study.

Background

I am a resident of Glebe, regularly use Blackwattle Park, live close to the precinct and have been following both the relocation of the Fish Markets and the redevelopment of the south western foreshore of Blackwattle Bay with great interest and concern. I am also an urban designer by professional and so know firsthand the vital importance of creating effective strategic policy to ensure that the final designs will create attractive and effective places that will stand the test of time.

The Blackwattle Bay State Significant Precinct Study

The Blackwattle Bay State Significant Precinct Study is a comprehensive urban design vision and strategy that has been developed to guide the future development of the Blackwattle Bay Precinct. It has been identified as an appropriate location and urban structure that will accommodate approximately 5,600 jobs and approximately 1,550 dwellings. The study also claims that the plan will deliver “a continuous waterfront promenade” and “new parks and green space with 30,000 square metres of new open space”.

Given the highly challenging current environment due to Covid 19 and the overwhelming level of detail provided upon which the department is seeking feedback, I have been unable to provide a detailed response outlining all my concerns on what, in my opinion, is an overdevelopment of a narrow and highly constrained area.

This submission has assumed that, given the current fondness for development, there seems little value in challenging the overall density and height of the proposed development. The submission therefore focuses on a few fundamental and critical issues which might, possibly, have an influence on the quality of the final outcome.

Impact of the draft SSP

Quantum of Open Space

The Explanation of Intended Effects (EIE) states that the plan will deliver “New parks and green space with 30,000 square metres of new open space”. The plan also states that “a total of three hectares of new parks and plazas is proposed, equating to approximately 30% of the site area”.

It is difficult to understand how these assertions have been derived. A quick review of the precinct plan suggests that the total open space provided is approximately 23,550sqm. Assuming the entire precinct is approximately 62,700sqm this would mean that 37.5% of the precinct will be open space however, critically, this is NOT all **new** open space.

As can be shown in Figure 1, existing open space makes up approximately 11,550sqm of the total, while **new** open space only accounts for 12,000sqm. In addition, half of this **new** open space, while zoned open space, is a critical access road into the site. The result is that the precinct is proposing 5,600 jobs and approximately 1,550 dwellings but only intending to deliver 6,000sqm of **new and usable** open space, which equates to 9.5% of the total site area. The proposed quantum of **new** open space is not considered significant or sufficient.

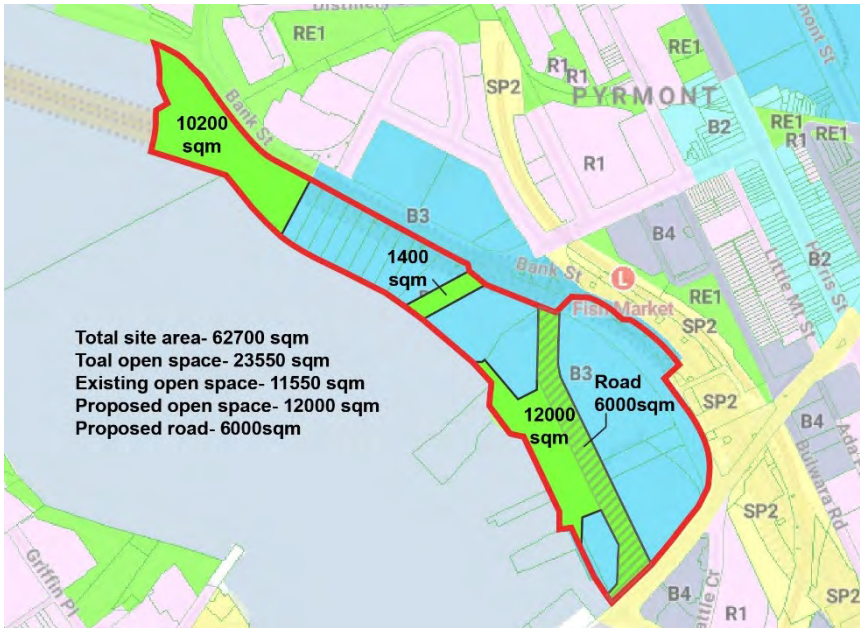


Figure 1: Existing and Proposed Open Spaces (with approximate area calculations)

Width of the Waterfront Promenade

The EIE identifies the importance and benefits of the continuous waterfront promenade which "will connect the Glebe foreshore with the Pyrmont Peninsula completing the foreshore walkway linking Glebe and Woolloomooloo for pedestrians and cyclists". Foreshore links are a critical amenity to the Harbour City and well used and much loved. This popularity creates many conflicts between walkers and runners, between cyclists and dog walkers and everyone in between and so the foreshore links need to be sized appropriately to facilitate the level of activity that is likely to occur.

Figure 2: Existing foreshore widths along Glebe, Pyrmont and Barangaroo

When looking at the current width of the foreshore walkway (see Figure 2) much of the existing foreshore open space is generous, although small pinch points of between 10-15m in width do occur. These narrow spots become areas of conflict, especially with cyclists which naturally travel at a faster speed. These narrowed sections are also usually much sparser with regard to landscaping and general amenity. The planned width of the walkway also needs to reflect the scale of the adjacent buildings.

Except where it adjoins existing and proposed areas of open space the proposed foreshore walkway is only 10m wide. As a comparison most of the foreshore promenade of Barangaroo is 20m wide, although some planned sections are as narrow as 15m. It is recommended that the minimum width of the foreshore link should be 15m excluding any colonnaded area under buildings.

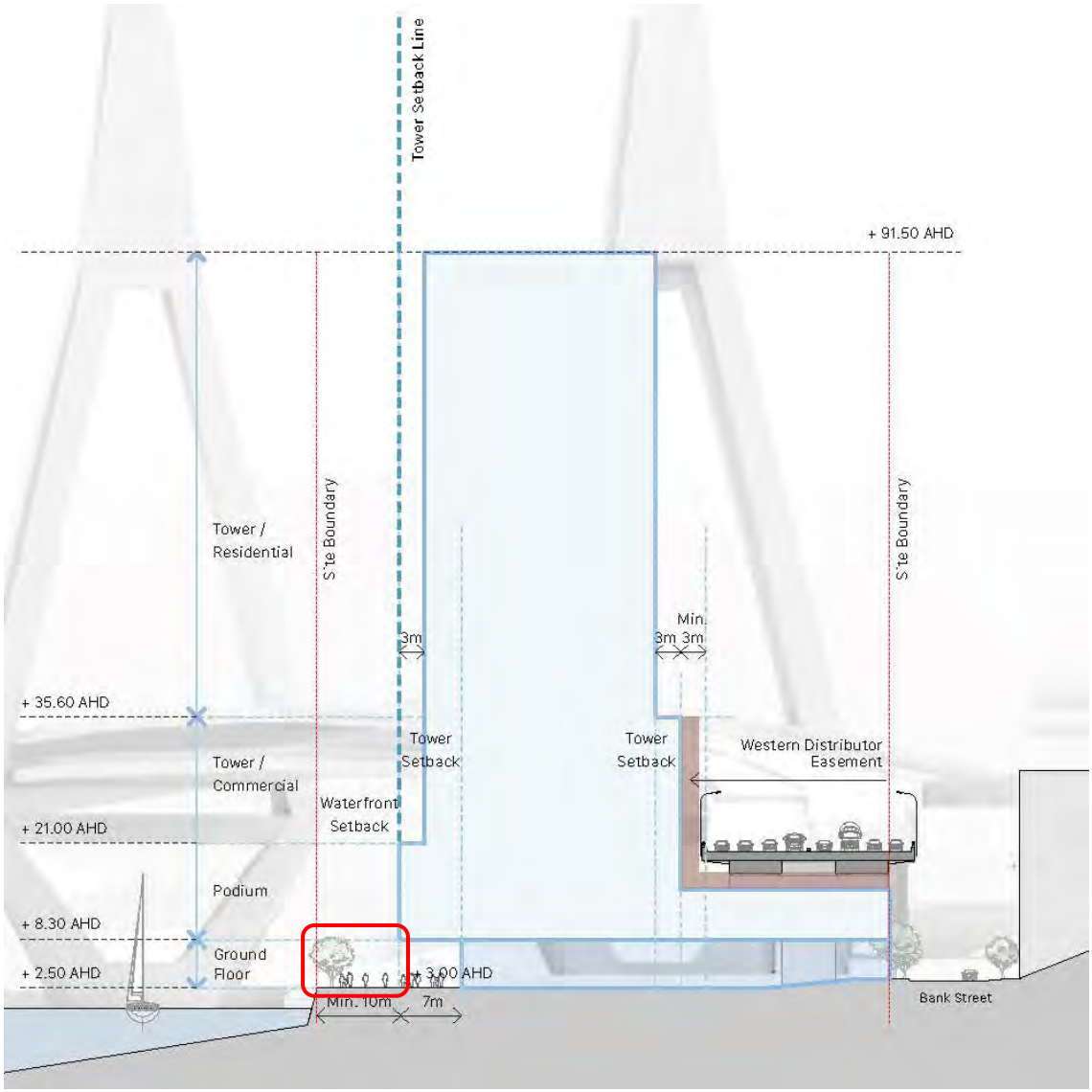


Figure 3: Walkway highlighted in red shown over Indicative Section B-B' of PLO 02 Building Envelope (Area 2)

Zoning of the Open Space

The EIE identifies that it will deliver “a continuous waterfront promenade” however the proposed zoning map does not require this promenade to be created nor for this land to be public. This is inconsistent with the approach taken in the surrounding areas which show a continuous and well established requirement for public open space along the waterfront.

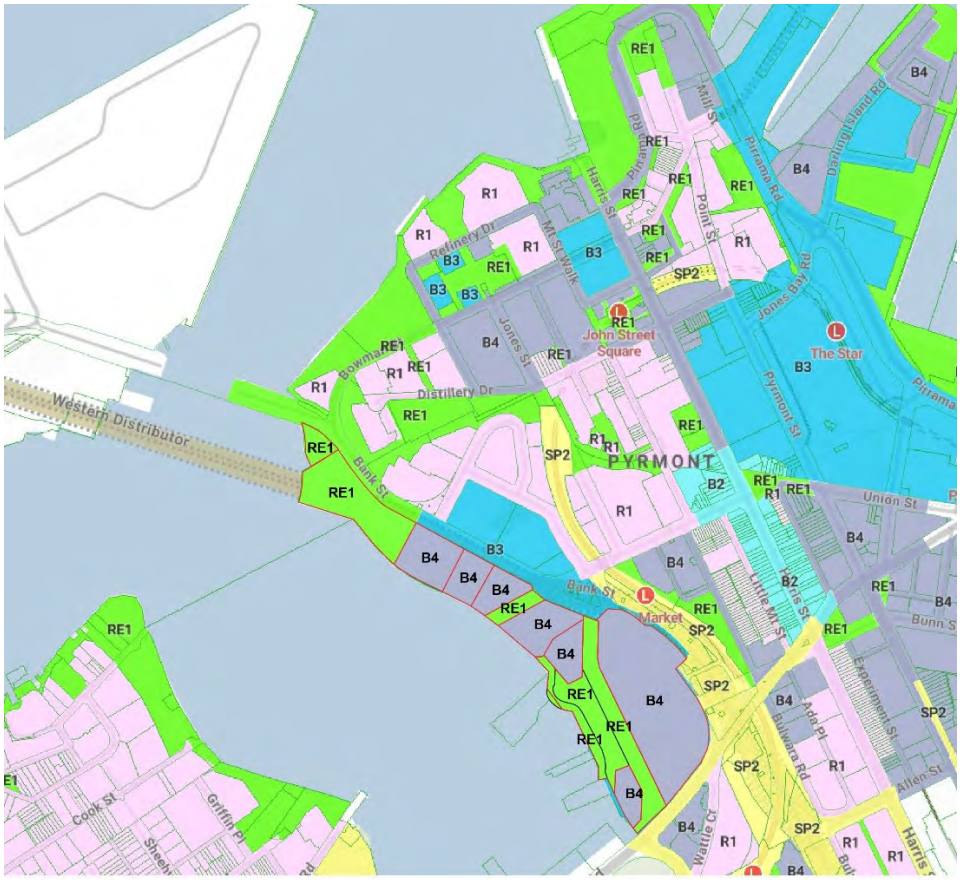


Figure 4: Proposed zoning shown over the existing zoning of the surrounding area (existing zoning sourced from Mecone mosaic)

It is accepted that the waterfront promenade is illustrated in the drawings and diagrams in the plan but the strongest planning tool, the plan showing the land use zone, is silent on this requirement. We have all seen many examples where development fails to deliver on the strategic intent when this intent is not clearly shown in the strategic policy documents. It is strongly recommended that the critical waterfront promenade, needed to provide “the missing link in an otherwise 15km foreshore walk from Woolloomooloo to Rozelle” is protected and ensured through the identification of an appropriate land use zone.

Other

The EIE also proposes modifying the Codes SEPP to include Blackwattle Bay as a ‘major event site’ to facilitate the holding of events in the public Domain. This is an outrageous proposal which utterly fails to recognise the sensitive location of the site.

The current major event sites are Barangaroo, Circular Quay, Darling Harbour, The Rocks and Sydney Olympic Park. These are dense major central city locations surrounded by tall buildings and supported by significant facilities where noise and crowds are expected.

Blackwattle Bay is a small narrow bay on the edge of the city and where one entire side of the bay is low to medium density residential dwellings most of which are in a heritage conservation area. No change to the SEPP should be contemplated until a detailed noise impact assessment of the impact of a “major event” has been undertaken. Noise travels widely across and up Blackwattle Bay, as recent piling for the Fishmarkets development has demonstrated so clearly.

Sincerely yours
Diana Griffiths

182306

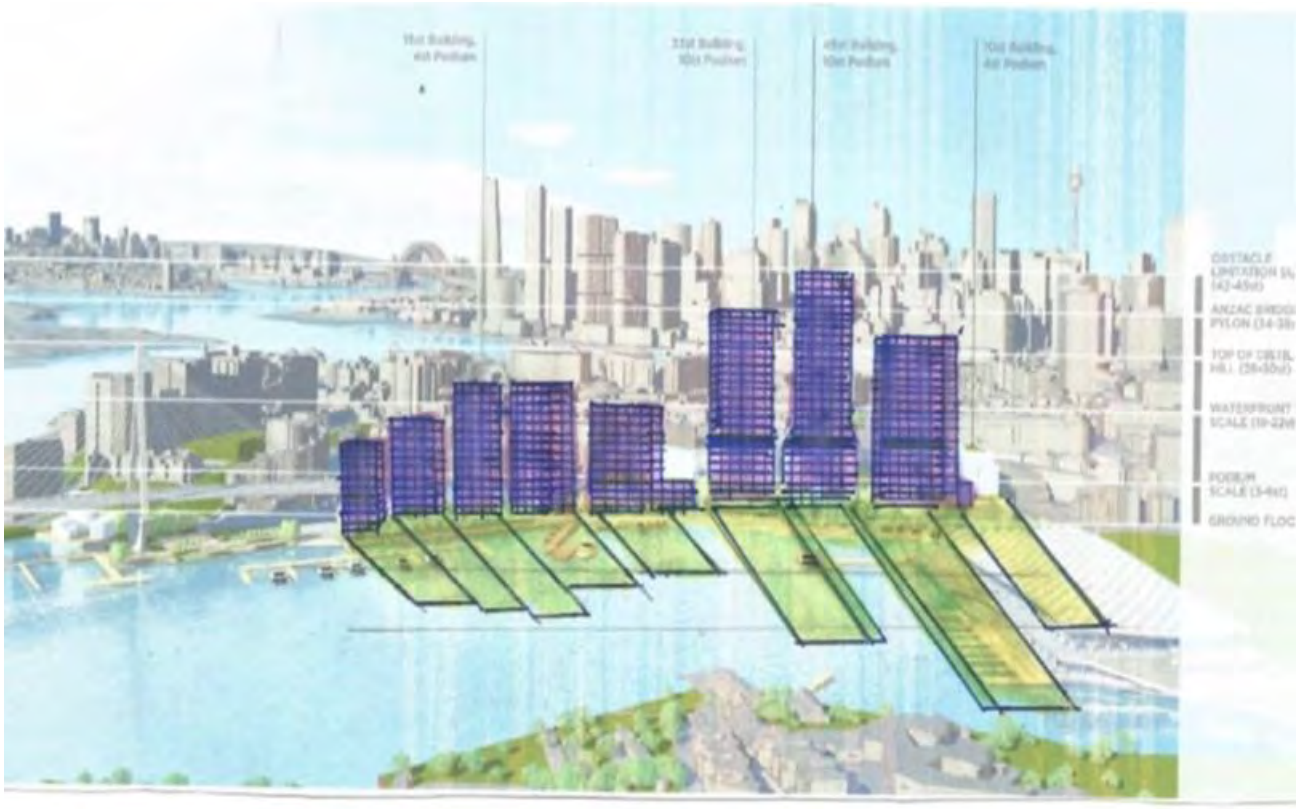
Hawcroft

Darlinghurst

Please advise receipt of this Submission. Thank You. Damien

bays community coalition

Bays Community Coalition
Submission - 20th August 2021
Blackwattle Bay State Significant Precinct Study



BLACKWATTLE BAY

TOWERS → SHADOWS

☹ Sunrise to 9.00am ☹

THE "BIG YELLOW TAXI" (#)

"They paved paradise
And put up a parking lot
With a pink hotel, a boutique
And a swinging hot spot

Don't it always seem to go
That you don't know what you've got til its gone
They paved paradise
And put up a parking lot" (#) Joni Mitchell

1.0 Overview

This Submission has been sanctioned by the following community groups:

1. **Pyrmont Community Group**
    a. Jean Stuart – Convenor
    b. Damien Hawcroft – Co Convenor

2. **Pyrmont Action Inc**
    a. Elizabeth Elenius – Convenor

3. **Annandale / Rozelle Bay Community Coalition & Better Planning Network**
    a. Maire Sheehan – Convenor / Leadership Group

4. **Balmain / Rozelle Residents Association**
    a. Kath Hacking – Convenor

5. **Friends of White Bay**
    a. Michele Hacking – Secretary

2.0 Introduction

Bays Community Coalition's (BCC) Submission is a response to the NSW Government's "The Blackwattle Bay State Significant Precinct Study (SSP Study)", Precinct Plan, Planning Controls and 50 Technical Study Attachments.

BCC was formed in 2013 and is a coalition of community groups that surround the Bay.

In light of COVID-19 and in relation to Blackwattle Bay, the community see the NSW Government as having a wonderful opportunity for this development to re-imagine architecture and city planning, and to create an inclusive space that meets the Government's objective of Blackwattle Bay being a "**world class liveable urban community"** with emphasis on the collective and not the individual.

Having reviewed the NSW Government's SSP Study and at least 19 of the 50 Technical Study Attachments, our Submission reflects the community's greatest concerns.

3.0 Executive Summary

This Executive Summary doesn't include all comments / questions that are in this Submission but reflects the community's greatest concerns as to irregularities in the NSW Government's SSP Study.

For all comments / questions as well as information supporting this Executive Summary please refer to Section 4.0 Reviewed – SSP Study and Attachments.

The community's greatest concerns, follow.

1. Attachment 2 - the SSP Study Requirement's Introduction states "The NSW Government established a Project Review Panel". Why no community representatives on this Panel?

2. Attachment 2 – The Government's Revitalising Blackwattle Bay Brochure's 3 x Scenarios (June 2020) were distilled into 1 x Scenario for this SSP Study. These 3 x Scenarios were never accepted by community so why is the Government proposing this 1 x Scenario?

   As expressed in Attachment 28 - Connecting with Country Framework for Tjerruing Blackwattle Bay Section 5.3 states "It is highly offensive to approach communities with an already established design and strategy to request approval and sign off for a tick-a-box outcome. Instead, Aboriginal communities should be engaged meaningfully, with a true desire to listen and learn in a respectful way that can ensure that their needs and requests are understood and implemented throughout all aspects of the project."

   This palpable statement echoes the frustration of Bay communities!

3. Attachment 2 - Winter Solstice shadowing analysis indicates the promenade adjacent to the apartments, Park Street, Park Lane, Gipps St, Gipps Lane, Banks St Open Space, Waterside Park and Cultural Centre will all be in shadow from sunrise to midday. How can this development meet its prime objective, i.e. to be "a world class liveable urban community"?

4. Attachment 3.1 - How can two "distinctive" Anzac Bridge pylons represent a "significant scale shift for the Bay" and therefore justify "potential taller building clusters including on the existing fish market site and around Bank Street through to Saunders Street." If you can make this connection to justify a 156m high / 45 storey Tower development then why is the same analogy not used for the Opera House or Harbour Bridge?

5. Attachment 3.2 – A shadowing analysis needs to be done for the eastern side of the proposed Tower Development.

6. Attachment 3.2 – Statement says "Benchmarks - Referred to as Podium Scale it is approx. 6 storeys - 55m…..Referred to as Waterfront Scale it is approx. 18 storeys." If this Document states the "optimum" harbours edge build is 55m then why is the Government proposing a development that has 8 x Towers exceeding 55m?

7. Attachment 3.2 – Natural Ventilation Compliance - Of the 12 Towers, all but one Tower are above 10 storeys which means many apartments will have no cross ventilation so why is the Government proposing this development?.

8. Attachment 3.2 – Noise and Air Pollution - The Study states "Australian Design Guidelines may not be possible in some situations due to noise (and pollution)". As all 12 Towers back onto the Western Distributor, why is the Government proposing this development?

9. Attachment 15 - This Report assesses "visual impact" of 20 Viewpoints looking onto the Blackwattle Bay development. Why is this Report's Conclusion based on 20 Viewpoints that give no consideration or weighting to the "visual" importance of each Viewpoint? Also, why did this Report's assessment workshop not involve community representatives?

10. Attachment 15 – Why is this Report's "Photomontage view of the precinct" shown as white, misty, fog like, transparent glass Towers rather than factual images of the final build?

11. Attachment 17 - The Air Quality Assessment's Recommended Mitigation Measures, i.e. "it is recommended that no sensitive receptors be located within a 20 m radius of the major roads." At least 7 x Towers and 3 x open spaces are "sensitive receptors" and to be developed within a 20 m radius of the Western Distributor. Given this Recommendation, why is the Government proposing this development?

12. Attachment 18 - The Noise and Vibration Assessment's Executive Summary states "The assessment confirmed that for most residential areas of the Precinct, road traffic noise impacts would be greater than industrial noise". Given this Summary, why is the Government proposing this Tower development?

13. Attachment 20 - If the "cash contributions" scenario is accepted then key or essential workers may never have ½ hr access to their workplace. Given this scenario, how can this project's prime objective of being a "world class liveable urban community" be achieved?

14. Attachment 20 - This Study promotes 5% affordable housing but the community has always asked for a figure of at least 15% including social housing. Why does the Government not have a 15% affordable and social housing figure?

15. Attachment 22 - Given this Report's demographic analysis indicates there will be a significant increase in children, the 50 to 64 age group and retirees. To accommodate this demographic the community wants a development that include social infrastructure such as: child care centres, aged care, library, community centre, health / medical centre, community garden, women's refuge and men's shed.

    Please also note, that the new Fish Market development and its workforce was not included in estimates for Day Care and pre-school accommodation need.

16. Attachment 34 – Given the overall water area of the Bay's proposed development is 21 hectares (67%) and land area is 10.4 hectares (33%), why does the Environmental Site Assessment Report's focus on land contamination and not the Bay's toxic sediments?

17. Attachment 34 – Separate from the Environment Assessment Report - refer to Report's Figure 2a: Current Site Layout, how are ferries going to access the designated Ferry Wharf given the shallowness of the Bay?

18. Attachment 41 – Why did the Health Impact Assessment's Report not address critical health concerns? Some of these concerns are in relation to:
    a. Twelve 6 to 45 storey Towers (predicted pop. 3000) built adjacent to and against the Western Distributor.
    b. Tower impact on shadowing open spaces including the promenade.
    c. Apartment wind.
    d. Bay sediment contaminants.
    e. Residents, commercial and public areas east of the Towers.

Also, why did the Report's risk assessment workshop not include community representatives?

4.0 Reviewed - SSP Study and Attachments

Attachment 01 – Blackwattle Bay Precinct Plan

The "Revitalising Blackwattle Bay" Paper (RBB) was released to the community by the NSW Government in May 2020. This Paper stated "We have taken the principles that we refined with the community in 2017 to develop three precinct place scenarios" …and for the community….."We welcome feedback on these scenarios".

On comparing the RBB with the Blackwattle Bay Precinct Plan (BBPP), some general observations follow:

1. **RBB's 3 scenarios show 3 x Potential Ferry Stops whereas the BBPP shows 1 x Potential Ferry Stop, why the reduction?**

   Also, the Potential Ferry Stop shown on the BBPP is inappropriate given the vessel has to sweep around in front of the Fish Market to arrive at the proposed wharf, then reverse from the wharf to leave the Bay.

   Also, the "possible" wharf is approx. 700m from Glebe Island Bridge, approx. 400m to the furthest apartment and approx. 600m to the Fish Market. These are inconvenient distances for many people including families and the disabled.

2. **Working Harbour moorings have increased in the BBPP compared to the RBB, why**? Also, the BBPP's moorings appear to accommodate more private / personnel recreational use vessels, why?

3. On comparing the BBPP with the RBB, the northern Bridge Road mooring appears to have doubled in length bringing the boat access jetty out to almost level with end of the Glebe Island Bridge land footing. **Why has this alteration been included as it creates a limited area for vessels to access the Bay via the Glebe Island Bridge opening?**

Attachment 02 – State Significant Site (SSP) Study Requirements – April 2017

On review of this SSP Study Requirement's Introduction, comments / questions follow:

1. **Introduction mentions "The NSW Government" established a Project Review Panel…..Not one mention is made of community representatives being part of this Panel, why not?**

2. **Introduction's SSP states "Study should demonstrate how the following key principles have been addressed." This Study includes 11 "key principles" whereas the Revitalising Blackwattle Bay (RBB) included 16 Principles.**

   The Study's 11 key principles exclude the following principles that were originally stated in the RBB's 16 Principles:

- **RBB Principle 2 – Minimise additional shadowing to Wentworth Park and Glebe Foreshore (in mid-winter) and create new places with comfortable conditions for people to enjoy.**

- **RBB Principle 3 – Pursue leading edge sustainability outcomes including climate change resilience.**

- **RBB Principle 7 – Mandate Design Excellence in the public and private domain.**

- **RBB Principle 13 – Plan for the community's future education, health, social and cultural needs.**

- **RBB Principle 14 – Deliver development that is economically, socially, culturally and environmentally viable.**

Other comments on the Study's "key principles" are:

a. **Given Climate Change is such a major challenge facing us globally we are concerned that addressing Climate Change is not a "key principle" of the BBPP and Study.**

b. **The Study's key principle states "create a district focussed on tourism and recreation, with compatible uses where appropriate." Why isn't the health and wellbeing of the proposed 1500 dwellings and 2800 residents one of the first and prime key principles? What is the objective of the Government's Study, tourism / recreation or community?**

c. **One of the Study's key principles states "If residential development is proposed", how can such a recent document suggest that residential development may not be proposed when the proposed end goal is 1500 dwellings?**

Requirement's Scope of Study

Scope of Study states in Point 6 "The extent and outcomes of engagement with the local community".

Comment: Scope of SSP Study states in Point 6 "The extent and outcomes of engagement with the local community".

In March 2007 the Premier announced the NSW Government would establish a community reference panel to provide community input to proposed land use reviews of the Bays Precinct. A Community Reference Group was established in 2009 but came to very little.

Urban Growth re-established a Community Reference Group (CRG), commencing December 2015. After 2 ½ years the CRG came to a halt and in June 2018, the CRG met with Urban Growth's Consultants (GHD) to determine how the communication process could be improved. As of 2018, Urban Growth was no longer part of the Bays Precinct vision and the CRG ceased to be.

Subsequently, a Blackwattle Bay Precinct Team was brought together by Government and this consultation process appeared to be more about the presentation of development plans rather than the presentation of ideas to enable the community to provide feedback and communicate their needs and aspirations.

In summary, it is apparent that community engagement is and continues to be a "tick and flick" exercise.

In June 2020, the community was given the Revitalising Blackwattle Bay document which incorporated 3 Scenarios for community comment. On review of these Scenarios it was apparent that there was little difference between the 3 Scenarios and not one Scenario reflected the hundreds of consulting hours the community had spent with various Government departments in discussing their objectives for the Bay.

Why then has the Government's flawed Revitalising Blackwattle Bay's 3 Scenarios been distilled to one Scenario for this SSP Study and what is apparent in this Study is that there appears to be a disconnect between the community's vision for a "sense of place" and Government's ambition for a rushed development driven by financial gain.

Key Study Requirements

Comments on some of the Study's requirements, follow:

2.Urban Design – this section states:

"2.9. Provide a comprehensive sun access analysis for the site and its surroundings at the Winter Solstice between 9am and 3pm, demonstrating the ability of the proposal to comply with standards as follows:

For new and existing apartments and private open spaces subject to the Apartment Design Guide, against the standards in that guide.

For all other new and existing dwellings, and private and public open spaces, against the standards in Sydney DCP 2012.

For the new 30 metre foreshore promenade (refer to section 3), against standards in Sydney DCP 2012 for public open spaces. Recognising that compliance with this standard may be difficult due to the orientation of this area, particularly in the morning, a sun access plane which maximises sunlight access to the promenade may be proposed

For the new area of foreshore promenade in front of the new fish market (refer to section 3), an appropriate standard should be proposed, recognising that solar access to the area is limited, particularly in the morning, and for the existing public open space, Sydney Secondary College, Blackwattle Bay Campus and walkways along the Glebe Foreshore and Wentworth Park, no additional overshadowing at the Winter Solstice 9am to 3pm must be demonstrated."

Question: On review of Attachment 03.2 – Blackwattle Bay Precinct Plan — Urban Design Statement Volume II, the promenade adjacent to the apartments, Park Street, Park Lane, Gipps St and Gipps Lane as well as the Waterside Park are located in front of the Towers and will be in the shade from when the sun rises to approx. 1200 pm.

Given the scale and orientation of the Towers and the defined Winter Solstice shadowing from these Towers, how can this proposed development meet this project's prime objectives, i.e. to have; "net zero carbon emissions", "5 Star Green Star – Communities" and a public space that provides "a world class liveable urban community"?

2.11. “Provide sufficient detail of the building types to demonstrate future compliance with amenity standards can be achieved including the Apartment Design Guide; including careful siting and layout of towers to minimise the impacts of noise and provide natural ventilation through open windows and to support any calculations that convert building envelopes to gross floor area and development yields.”

Question: On review of Attachment 03.2 – Blackwattle Bay Precinct Plan — Urban Design Statement Volume II, all 12 Towers back onto the Western Distributor, one of the busiest vehicle corridors in Australia. How can this development achieve “high levels of amenity with application of effective strategies in detailed design” without compromising the project’s prime objective of having “net zero carbon emissions” and being of a “5 Star Green Star – Communities” standard?

The Statement includes an Ecologically Sustainable Development (ESD) report which assesses sustainability benefits and provides recommendations but does not address shadowing, why not?

6.Housing and Affordable Housing

Section 6.3. states “Identify the range of mechanisms/models to provide affordable housing (including affordable rental housing for very low, low and moderate income households) and assess their feasibility. Maximise provision of affordable housing noting the target of 5%-10% of new floor space referenced in the draft Central District Plan or any greater target if NSW Government policy changes.”

Blackwattle Bay Guide to State Significant Precinct Study June 2021 Page 3, 1.3 it states “To implement the Precinct Plan it is proposed to award Sydney LEP by;

- A requirement for contribution to affordable housing, equivalent to 5% of the total residential GFA being developed or provided as a monetary contribution.”

Question: The above mentioned mechanism of providing a “money contribution” contradicts the spirit of why this development should include at least 5% affordable housing. What is the point in making a monetary contribution that forces essential workers, such as police, teachers, nurses, aged care workers, garbage collectors, etc. to live in developments located more than ½hr travelling distance from their place of work?

8. State and Regional Infrastructure

Section 8.4 states “Ensure that school provision is determined with reference to the demographic information established by the Population Demographic study at Section 26 and outline any consultation with the Department of Education, including reference to their policies and procedures.”

Question: The proposed project’s resident (1550 dwellings and 2800 residents) numbers must indicate the need for day care centres to be part of this development and located within walking distance from the proposed apartments. Why does the proposed development not include Government subsidised day care centres?

17. Climate Change

Demonstrate that compliance with BASIX is achievable and investigate opportunities to deliver beyond-compliance BASIX scores: Energy 40 and Water 60 for residential towers (6+ storeys).

Question: As many of the "western" residential / commercial / retail towers will face east and back onto a second tier of building towers, these tower areas will be in shade all day therefore requiring 24/7 lighting and air conditioning. Windows will not be opened given the wind / draught / vehicle pollution factor.

No attachments demonstrate compliance with the Building Sustainability Index (BASIX), why not?

Attachment 03.1 – Urban Design Statement Vol I – June 2021

Executive Summary

States: "In early 2020, the NSW Government took three distinct scenarios to the community. These explored different urban renewal possibilities for land use, urban structure, open space, materiality and built form. The community provided detailed and valuable feedback that has informed the development of the draft Precinct Plan."

Comment / Question: the NSW Government asked the community to give feedback on 3 scenarios for Revitalising the Bay, these scenarios were:

- **Scenario 1 – titled "Homes" with a Gross Floor Area 236,750m^2 for Residential, Commercial, Retail and Service Apts/Hotel**
- **Scenario 3 – titled "Balanced" with a Gross Floor Area 215,550m^2 for Residential, Commercial, Retail and Service Apts/Hotel**
- **Scenario 1 – titled "Jobs" with a Gross Floor Area 248,450m^2 for Residential, Commercial, Retail and Service Apts/Hotel**

The community were asked to give feedback on the NSW Government's 3 Scenarios none of which reflected the many 19 years of community wishes for a balanced development. The Revitalising Blackwattle Bay Paper did not provide an opportunity to comment on alternatives to the 3 Scenarios.

The Government Paper asked the community for "feedback on these scenarios" only with no provision for alternative community commentary? The SSP Study is the Government's scenario not the community scenario, why?

Community and Stakeholder Consultation

States: "Community and stakeholder consultation remains an essential and effective process to invite input from community members, landowners, local authorities, industry groups and government agencies to shape and develop the future of the precinct. Through past engagement processes, the wider Bays Precinct Transformation Plan has been developed with the community. The vision and sixteen principles for Blackwattle Bay have been established, and three scenario plans explored to support the preparation of this draft Precinct Plan."

Comment / Question: The NSW Government's "Revitalising Blackwattle Bay – June 2020" Brochure was delivered to the community for the community "to secure your feedback and input and understand your preferences" on the 3 Precinct Plan Scenarios provided to "assist with determining the final precinct plan." The community were asked to provide feedback on these 3 Scenarios which the community had never seen or been consulted to prior to the Brochures release in June 2020. Would you call this community consultation?

Design Principles

Section states: "The thirteen Design Principles were expanded to sixteen through subsequent consultation with First Nations communities, the Community Reference Group and Private Land Owners."

Comment / Question: As previously noted, the SSP states "Study should demonstrate how the following key principles have been addressed." This Study includes 11 "key principles" whereas the Revitalising Blackwattle Bay (RBB) included 16 Principles. Five key principles have gone missing, why?

Vision

"Sustainability and Resilience - The draft Precinct Plan targets net zero carbon emissions." and "The urban forest strategy for Blackwattle Bay confirms a minimum of 60% tree canopy cover for streets and 30% for open spaces."

Comment / Question:

1. **Proposed by the Government are 12 Towers varying in height from 21m to 156m. These Towers are positioned on the eastern side of a 30m wide foreshore promenade which will mean the promenade up to the base of these Towers will be in shadow for at least half of the day's sunlight hours. How can this provide a sustainable and resilient future for the community?**

2. **Proposed 12 Towers vary in height from 21m to 156m and are located on the eastern side of the Bay. Some Towers are built parallel and adjacent to one another resulting in many of these Tower floors not being exposed to direct sunlight. How can this provide a sustainable and resilient future?**

3. **Stated is a "60% tree canopy cover for streets and 30% for open spaces." with "at least 30,000m^2 - or approximately 30% of the Study Area – of new open space" including a 30m wide promenade. Given the cooling and cleaning effect that native vegetation has on the environment and the impact tree cover can have on reducing the impact of direct sunlight to both place and people, why is the target for tree canopy only 30% as this is not enough to deliver a "net zero carbon emissions" place or Green Star community or healthy sun protection environment for all people, young and old?**

4. **Planting trees in not enough to mitigate climate change and the increasing heat and sunlight emissions. Where in this Study are the imaginative and hard control architecture based designs that address the increasingly high risk factor of sun and heat?**

Built Form

As stated "The Anzac Bridge spans 345m across to Rozelle and is anchored by its distinctive pylons that reach a height of 120m above the ground level at Bank Street. The bridge represented a significant scale shift for the bay when it was opened in December 1995 and has become a visual landmark for the Inner West. The Pyrmont Peninsula Place Strategy identifies potential taller building clusters including on the existing fish market site and around Bank Street through to Saunders Street. "

Comment / Question:

How can two "distinctive" bridge pylons represent a "significant scale shift for the Bay" and therefore justify "potential taller building clusters including on the existing fish market site and around Bank Street through to Saunders Street."

If you can make this connection to justify a 156m high / 45 storey Tower development then why is the same analogy not used for the Opera House or Harbour Bridge?

Using this "scale shift" correlation could hypothetically mean that in a suburb of one and two storey dwellings if one house has a 10 storey flagpole in their front yard then that becomes a significant scale shift for the suburb and 10 storey buildings should then become the norm. How can the Government use 2 x bridge pylons for their justification of 156m tall Towers?

The Government's Tower design is a developer / economic driven proposal with inherent design characteristics that will never achieve the project's objectives of a "net zero carbon emissions" or "5 Star Green Star – Communities" or "world class liveable urban community" status?

Attachment 03.2 – Blackwattle Bay Precinct Plan — Urban Design Statement Volume II

A Responsive Precinct Plan

States: "The three scenarios prepared for community feedback in mid-2020 were framed to explore alternative strategies across the range of urban design considerations. Community and stakeholder input and feedback was sought."

Comment: as previously mentioned, the NSW Government asked the community to give feedback on 3 scenarios for Revitalising the Bay with no provision for alternative scenarios. The scenario we now see in the NSW Government' SSP Study is the Government's Scenario not the community's scenario!

States: "Community feedback received from survey and online panel participants was primarily focused in 5 key areas:

1. Height and Density — Neighbourhood character & context Built form elements such as heights immediately adjacent to the water's edge, podium heights, tower arrangements, locations and heights, as well as materials like timber, stone and brick, have been informed by the surrounding character and context. Refer to section 2.10"

Comment: the NSW Government asked the community to give feedback on 3 Scenarios and provided no other options. This is not community consultation!

Section 2.9 – including: Page 80 - Heat Map of Overall Proposed Promenade & Public Open Space Page 84 - Shadow Overlay (9am / 12pm / 3pm on 21 Jun)

Section 2.9 states: "Provide a comprehensive sun access analysis for the site and its surroundings at the Winter Solstice between 9am and 3pm demonstrating the ability of the proposal to comply with standards as follows: — For the existing public open space, Sydney Secondary College, Blackwattle Bay Campus, and walkways along the Glebe Foreshore and Wentworth Park, no additional overshadowing at the Winter Solstice 9am to 3pm must be demonstrated. — For the new 30 metre foreshore promenade (refer to section 3), against standards in Sydney DCP 2012 for public open spaces. Recognising that compliance with this standard may be difficult due to the orientation of this area"

Comment / Question:

Question 1 – Page 80 - Heat Map of Overall Proposed Promenade & Public Open Space and Page 84 Shadow Overlay (9am / 12pm / 3pm on 21 Jun), commencing at Tower 1-1 and finishing at Tower 05, the amount of sun (Winter Solstice between 9am and 3pm) on the promenade is summarised as:

- **Approx. 50% of sun for less than 1 hr**
- **Approx. 10% less than 2 hrs**
- **Approx. 25% less than 3 hrs**
- **Approx. 15% a minimum of 4hrs (+)**

Attachment 03.2
URBAN DESIGN STATEMENT
Volume II PAGE 84.

9.00am
12.00pm
PROMENADE

SHADOWING DIAGRAM

/ Shadow Overlay (9am / 12pm / 3pm on 21 Jun)

A shadow analysis was carried out beyond the standard criteria to assess the extent of morning shadowing at 8:30am on the 21st of June for people visiting the Glebe Foreshore. Minimal shadowing occurs to the foreshore in front of Sydney Secondary College while the primary Glebe Foreshore open spaces are still free from overshadowing. The quality of sunlight before 8:30am on the winter solstice across Blackwattle Bay starts to become very low impact.

/ Shadow Analysis at 8:30am on 21 Jun

From the above shadow diagram, the majority of people (residents, office workers, tourists, etc.) accessing the promenade, streets, lanes and cafes during these busy and vibrant morning hours will be doing so in the shade! How can this possibly meet one of this proposed development's prime objective, i.e. "a world class liveable urban community"?

The Government's Urban Design document acknowledges this problematic shadowing by stating; "Recognising that compliance with this standard may be difficult due to the orientation of this area" **but does not offer alternative imaginative building designs to negate this shadowing problem. Alternative design to be considered:**

- **Tower orientations**
- **Tower heights**
- **Tower shapes**
- **Tower roof tops to accommodate sun / light collector / deflection shutters**

The proposed Tower's shadowing will never provide for the Government's development objective, i.e.; a "net zero carbon emissions" and "5 Star Green Star – Communities" and a public space that provides a "world class liveable urban community".

Question 2 – Bank St Open Space, Park Street, Park Lane, Gipps St, Gipps Lane and Waterside Parks take up a considerable amount of the "open space" and given the Winter Solstice analysis, these streets and lanes will not be in sunlight until at least 12 pm.

Given this shadowing how can this project's shadowing provide for a world class design that meets a "net zero carbon emissions", "5 Star Green Star – Communities" and world class liveable urban community status?

Question 3 – there is no analysis and shadow diagrams for the EASTERN side of this development and what impact the loss of the western sun will have on the residential and commercial properties and streetscape located east of these Towers. To obtain a holistic appreciation of the impact this development will have on the surrounding neighbourhood, a shadowing analysis needs to be done for the eastern side of the proposed Tower Development.

Land Uses / Distribution of GFA / Yields / Building Typologies / Envelopes / Heights

Section 2.10 Provide an analysis and justification of proposed distribution of gross floor area, development yields, building typologies, building envelopes and heights.

This Section states "Planning Envelopes …The planning envelopes of the draft Precinct Plan are derived through a deductive process that begins with the protection of existing key open spaces from overshadowing and then removes envelope from open spaces, the waterfront promenade and new streets. Establishing relationships to the existing and evolving morphology of the context further modifies the envelopes. Local solar access and scale relationships are applied to create the controls of final urban form envelope."

Comment / Question: this Section statement of "Planning Envelopes……..begins with the protection of existing key open spaces from overshadowing" contradicts the previous Section 2.9 which states "Recognising that compliance with this standard may be difficult due to the orientation of this area".

Also, Section 2.10 states "Establishing relationships to the existing and evolving morphology of the context further modifies the envelopes. Local solar access and scale relationships are applied to create the controls of final urban form envelope."

Comment: Impressive but meaningless rhetoric which only provides clichéd and patronising commentary.

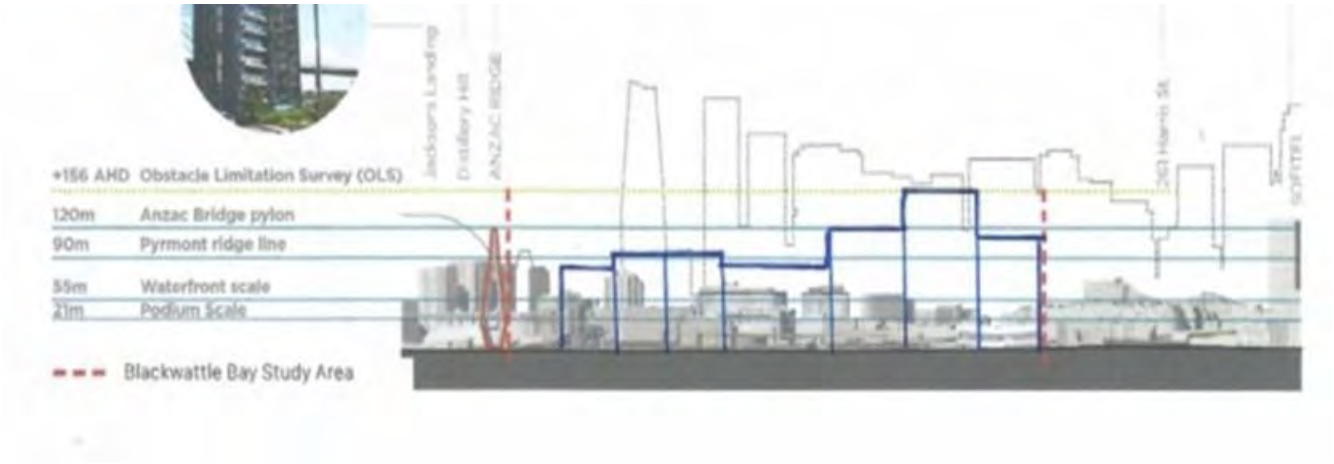
This section also states "1. As outlined in the response to Study Requirement 2.9 Sun Access, a solar envelope has been developed for Blackwattle Bay by projecting sun planes at the relevant times on June 21st to protect the Glebe Foreshore, Sydney Secondary College and Wentworth Park from overshadowing from the new built form.

Comment / Question: Why is there so much emphasis placed on the shadowing protection of Glebe Foreshore, Sydney Secondary College and Wentworth Park (all well removed from the Towers' shadowing impact), and such little importance placed on the key public element of this proposed development, that is the publicly accessible Waterfront Promenade, Cafes, Waterside Parks and Open Spaces all of which will be predominately in shadow until at least 1200 midday?

Also, why has there been is no analysis / documentation showing the impact of Tower shadowing on the residential and commercial buildings located on the eastern side of the proposed Towers?

Building Height and Density

This Section states "Density is an essential ingredient in successful urban environments. Greater density can support higher quality public domain and open spaces, more vibrant streets and retail and better community facilities. Limits to density are the environmental impacts on surrounding neighbourhoods and the amenity characteristics of the buildings being provided."



Comment / Question: "Density is an essential ingredient in successful urban environments." This sweeping hyperbole attempts to dilute the gravitas of the impact that this Tower development will have on Blackwattle Bay and surrounding neighbourhood.

Consider the above "before and after" image and the approx. profiles of 72m, 75.5m, 91.5m, 110m, 120m and 156m Towers located along a short and narrow strip of land confined by Blackwattle Bay to the west and the massive Western Distributor / interchange to the east. How is it possible for this development to "support higher quality public domain and open spaces, more vibrant streets and retail and better community facilities"?

"Greater density can support higher quality public domain and open spaces, more vibrant streets and retail and better community facilities. Limits to density are the environmental impacts on surrounding neighbourhoods and the amenity characteristics of the buildings being provided."

Comment / Question: Agree that "Limits to density are the environmental impacts on surrounding neighbourhoods" so why are 91.5m, 110m, 120m and 156m Towers (Max 45 Floors) being proposed when they contradict what the NSW Government is stating as essential characteristics for great urban design?

Benchmarks as stated on Page 89 — 21m: Desired human-scale height immediately adjacent to harbour's edge, as well as framing primary streets and future open spaces. Referred to as Podium Scale it is approx. 6 storeys. — 55m: Height of existing buildings just back from harbour's edge such as Evolve in Jackson Landing. Referred to as Waterfront Scale it is approx. 18 storeys.

Comment: Agree with the 21m and 55m benchmarks as they are relative to the immediate neighbourhood and reflect good urban design. Why hasn't the Government committed to these optimum foreshore heights?

Potential Social Infrastructure, Community Facilities and Cultural Uses

Stated "At the north end of Waterside Park, addressing the promontory, community space could include a library, childcare and/or theatre….. A multi-purpose court, outdoor fitness and play facilities are proposed sports and recreation facilities at the east end of Bank Street open space."

Comment / Question: if the community are to agree to this development we can't have statements like "childcare and/or theatre."

Given our aging population and the attraction this development will have for both young and old, the Social Infrastructure and Cultural Uses need to be clearly defined and include:

- **Child Day Care and Preschool facilities**
- **Aged care facilities**
- **Library and Community Centre (facility that would accommodate a community meeting place / art, music, reading classes / domestic classes / technology (mobile phone and computer) classes / motherhood classes / diverse cultural gathering area / yoga / meditation, etc.)**
- **Community Health / Medical Centre**
- **Community Gardens**
- **Women's Refuge**
- **Men's Shed**

Please also note, that the new Fish Market development and its workforce was not included in estimates for Day Care and pre-school accommodation need.

"The devil is in the detail" and without the social infrastructure as detailed above, this proposed development will never provide a "world class liveable urban community".

Natural Ventilation Compliance

States: “At least 60% of apartments are naturally cross ventilated in the first nine storeys of the building. Apartments at ten storeys or greater are deemed to be cross ventilated only if any enclosure of the balconies at these levels allows adequate natural ventilation and cannot be fully enclosed.”

Comment / Question:

Of the 12 Towers, all but one Tower are above 10 storeys which means many apartments will have no cross ventilation. How does this enable the Towers to meet the project’s objective of being natural ventilation compliant?

The proposed Towers built adjacent to the Western Distributor will impact the residential and commercial buildings located to the east of these Towers and Distributor. Has the Government done a natural ventilation study for the area located to the east of this development?

Noise

This section states: “Objective 4J-1 of the Australian Design Guidelines (ADG) provides design guidance in relation to noise impacts. The Objective also notes that achieving the design criteria of the ADG may not be possible in some situations due to noise (and pollution). Notwithstanding this acknowledgement, the residential components of the draft Precinct Plan are expected to achieve high levels of amenity with application of effective strategies in detailed design.”

Question: Given all 12 Towers back onto the Western Distributor and the Study stating “Australian Design Guidelines (ADG) may not be possible in some situations due to noise (and pollution)” how can this development achieve “high levels of amenity with application of effective strategies in detailed design” without compromising the projects prime objective of being a “net zero carbon emissions” and “5 Star Green Star – Communities” and world class liveable urban community?

Question: the proposed Towers built adjacent to the Western Distributor will impact the residential and commercial buildings located to the east of these Towers and Distributor. Has the Government done a noise study on the eastern side of this development?

Air Pollution

This section states "When air quality should be a design consideration: — Within 20 metres of a freeway or main road (with more than 2500 vehicles per hour, moderate congestions levels of less than 5% idle time and average speeds of greater than 40 km/hr) — Within 60 metres of an area significantly impacted by existing sources of air pollution (road tunnel portals, major intersection / roundabouts, overpasses or adjacent major industrial sources)" Development Near Rail Corridor and Busy Roads - Interim Guideline, NSW, P3.”

Question / Comment: Given all 12 Towers back onto the Western Distributor how can this development achieve “high levels of amenity with application of effective strategies in detailed design” without compromising the projects prime objective of being a “net zero carbon emissions”, “5 Star Green Star – Communities” and world class liveable urban community?

Question: the construction of 12 Towers against the Western Distributor will increase a pollution impact on the residential and commercial buildings located to the east of these Towers and

Distributor. Why has the Government not done pollution impact studies on the eastern side of this development?

Other Impacts

Section "2.16 integrate the findings of other parts of this study and demonstrate how these have shaped the public domain plan and the building typologies to meet their requirements. In particular how the design of building types respond to ESD, wind, flooding, noise and pollution issues."

Comment / Question: The Ecology Sustainable Development (ESD) report assesses sustainability benefits and provides recommendations for the proposed development but no consideration has been given to what impact this development will have on the commercial and residential infrastructure located to the east of these 91.5m, 120m, 156m and 110m Towers. Why has the ESD report not considered the eastern side of the Towers / Western Distributor?

ESD **"**An Ecologically Sustainable Development report has been prepared by Aecom. The report outlines the sustainability context, identifies trends and drivers, and establishes sustainability targets for the renewal of Blackwattle Bay. The report assesses sustainability benefits and provides recommendations across initiatives including….."

Comment / Question: The Ecology Sustainable Development (ESD) report assesses sustainability benefits and provides recommendations across initiatives. Why do these initiatives exclude one major ESD factor, i.e. shadowing?

Question: Why does the Ecology Sustainable Development (ESD) report not consider the impact (noise / air quality / air pollution / shadowing) that this Tower development will have on the residential and commercial areas located east of these Towers?

Noise

The ESD Report writes 1 page about noise and states "Where residential is located closest to the Western Distributor, investigations into acoustic treatments to facades, balconies and winter gardens will be required in detailed design to ensure that internal living environments are appropriate and comfortable."

Comment / Question: The ESD Report provides motherhood statements such as "investigations into acoustic treatments ……will be required in detailed design to ensure that internal living environments are appropriate and comfortable." Why doesn't this Report provide recommendations that enables this Study to define how the NSW Government will meet its project objectives resulting in an Ecology Sustainable Development?

Air Quality

The ESD Report writes ½ page about air quality and states "Similar to the noise assessment, the arterial road network is a key source of pollutants impacting the Study Area. ……..Natural ventilation of apartments is important to occupant amenity. Investigations in detailed design for specific building locations and configurations will be required to ensure that natural ventilation can be provided whilst mitigation the impact of poor air quality."

Comment / Question: Again, the ESD Report provides motherhood statements such as ". Investigations in detailed design for specific building locations and configurations will be required." Why does this Report only provide motherhood statements?

Wind

The ESD Report writes 2 pages about wind and states "Good design practice initiatives have been incorporated into the built form strategies in consultation with the specialist wind consultants".

Comment / Question: The ESD Report provides a statement on impact of wind and research done to address this risk. If the Report can do it for "Wind" why hasn't it done this for "Noise" and "Air Quality"?

Attachment 5: Population Demographics and Workforce Profile June 2021

Executive Summary

- The forecasts for the Blackwattle Bay Study Area see an increase in population from 0 in 2016 to 2,795 in 2036. This forecast is based on an increase of 1,546 dwellings in net terms between 2024 and 2032.
- Average household size is expected to decrease from at 1.99 in 2026 to 1.90 in 2036.
- The area is expected to attract a range of markets including both younger adult age groups driven by all the classic attributes of inner city areas and older working adults and retirees, attracted by waterfront property with close proximity to the new Sydney Fish Market as well as a range of transport options and waterfront trails.
- The largest forecast increases by age are in the 25-39 age bracket by 2036. This is partly the result of people migrating to the area in those age groups, as well as the ageing of early movers to the site in their 20s. There are also significant increases in the 50 to 64 age group.

Comment / Question: Attachment 5: Population Demographics and Workforce Profile June 2021 states "There are also significant increases in the 50 to 64 age group."

Given our aging population and the attraction the elderly would have to living in this proposed development, why hasn't social infrastructure that caters for this older demographic been included in this development?

Social infrastructure mentioned in the Study includes a community centre and library and / or theatre but needs to also include:

- **Day Care Centres**
- **Community Health / Medical Centre**
- **Community Gardens**
- **Women's Refuge**
- **Men's Shed**

Attachment 15: Visual Impact Assessment - June 2021

SUMMARY OF FINDINGS

Overall, the following conclusions can be drawn on the precincts impacts to visual amenity within the study area:

• the majority of the visual impacts fall within the negligible to moderate scale (eleven viewpoints), with nine viewpoints registering a moderate/high to high rating"

Comment / Question 1: Detailed in "Figure 9.1 - Summary of visual impacts of the precinct across the study area." the Visual Impact that this development will have on the 20 designated areas surrounding Blackwattle Bay is summarised as follows:

- **3 - High**
- **6 - Moderate / High**
- **3 - Moderate**
- **6 - Moderate / Low**
- **1 – Low**
- **1 - Negligible**

Comment 1: The problem with this Report's Analysis is that the 20 designated areas surrounding the proposed Blackwattle Bay development and assessed for visual impact were not weighted based on their "visual" importance, for example:

1. **Viewpoint 3 "Foreshore open space adjacent to Blackwattle Bay Park" is located on the Bay directly opposite the Towers (see photo below) and is a prime view point for this development and its potential for Sensitivity and Magnitude is an "Extremely High".**

2. **Viewpoint 17 "Wattle Street near Mary Ann Street" received a Visual Impact Rating of "Negligible." This is not a prime view point for this development and its potential for Sensitivity and Magnitude is rated as "Extremely Low."**

However, both Viewpoints receive the same "viewpoint" qualification, why?

The statement in this Report, Section 10.0 Mitigation and Conclusion – Summary of Findings states "On balance it is the professional opinion of the authors of this assessment that (on the basis that the proposed mitigation measures are implemented through the detailed design stage) the visual impacts combined with the overall visual catchment of the precinct, and the highly urbanised location that the precinct would occupy, are such that they would not constitute reasons to hinder approval on visual impact grounds."

The Report's Conclusion and Summary is based on a result of:

- **11 Viewpoints - "negligible to moderate scale"**
- **9 Viewpoints – "moderate/high to high rating"**

Why is this Report's Conclusion based on 20 Viewpoints which were not considered and / or weighted based on the "visual" importance of each Viewpoint?

Section 10.0 Mitigation and Conclusion – Summary of Findings

Comment / Question 2: If the Report's "Photomontage view of the precinct" (as shown below) were used to assess Sensitivity and Magnitude Visual Impact, then why are the photomontage Towers shown as white, cloud like, transparent glass towers opposed to realistically coloured, opaque build?

Comment / Question 3: Why did the Community Reference Group not participate in this Report's assessment process workshop? As this Report's assessment does not use community representatives in the workshop assessment of these 20 Viewpoints then how can this Report's results be accepted as credible?

Overall VISUAL IMPACT RATING (Combination of sensitivity and magnitude ratings)

VISUAL IMPACT RATING (Combination of sensitivity and magnitude ratings) – Moderate / High

Attachment 16: Social Sustainability Assessment Draft Report, Client: Infrastructure NSW, Date: 21 May 2021

Section 10 Social Sustainability Plan

States "This section summarises the proposed actions from sections 8 and 9 of this report, into a Social Sustainability Plan.

It is important to note that the proposed recommendations are grouped into stages related to the planning and delivery process. These stages are:

- Rezoning (the current stage)
- Detailed design and development application
- Project delivery and operations.

…….The later stages of recommended actions will focus on more detailed design elements that can be addressed through the detailed design and development approvals processes and the many, and important, non-physical elements of social sustainability that require an array of community engagement, community and cultural development and place activation and management mechanisms to take effect."

Comment / Question: From a community perspective the draft Social Sustainability Assessment is a very important Report and addresses many of the community's concerns and aspirations to ensure that this development results in a world class liveable urban community.

Questions follow:

1. **Given the importance of this Social Sustainability Assessment document why is it stamped "Draft". We would like to see the Final Report as a "Draft" Report means it has not been accepted by the NSW Government and should not be included. Sounds pedantic but from a community perspective it is very important that a Final Report be tabled.**

2. **Recommendation R26 states "Continue to engage with all relevant groups and stakeholders through the rezoning and all future planning and development stages."**

   Unfortunately, our perception of community consultation is the NSW Government telling the community what has been planned with little opportunity for community feedback.

Attachment 17: Air Quality Assessment June 2021

Executive Summary

The proposed Precinct Plan for the Study Area incorporates a number of mitigation measures consistent with Section 4.4 of the Guideline including:

- Minimising the formation of urban canyons by having buildings of different heights interspersed.
- No sensitive receptors (*) (residential units) are proposed within a 20 m radius of the major roads.
- For all proposed buildings (with the exception of BLD 02) the lower eight floors are proposed to be used for commercial/retail purposes. For BLD 02, only the ground floor is proposed to be used for retail purposes, with residential uses from level 1 and above.

The mitigation measures outlined above will minimise any potential for sensitive receptors to be exposed to high levels of pollutants emitted from vehicles travelling on the nearby road.

(*) Examples of Sensitive Receptors are defined in Section 2.0 of this Report "e.g. residential uses, schools, child care centres and public open spaces."

Section 2.0 Study Requirements

The study requirements relevant to air quality are shown in Table 1 and are reproduced from the Blackwattle Bay Final Study Requirements (28 April 2017).

Table 1 – Study Requirements 22.5 – states "Identify and map current and proposed future **sensitive receptors (e.g. residential uses, schools, child care centres and public open spaces)"**

Section 11.0 Recommended Mitigation Measures

As air pollutant concentrations from road traffic (main source of emissions identified in the study area) tend to decrease with increasing distance from the road, it is **recommended that sensitive receptors within the Precinct be located as far away from the main roads as possible.** Considering the reported significant (75%) drop in pollutant concentrations 20 m away from the road (DoP, 2008), **it is recommended that no sensitive receptors be located within a 20 m radius of the major roads.**

As air pollutant concentrations from road traffic (main source of emissions identified in the study area) tend to decrease with increasing distance from the road, it is recommended that sensitive receptors within the Precinct be located as far away from the main roads as possible. Considering the reported significant (75%) drop in pollutant concentrations 20 m away from the road (DoP, 2008), it is recommended that no sensitive receptors be located within a 20 m radius of the major roads.

The proposed Precinct Plan for the Study Area incorporates a number of these measures including:
- Minimising the formation of urban canyons by having buildings of different heights interspersed.
- No sensitive receptors (residential units) are proposed within a 20 m radius of the major roads.
- For all proposed buildings (with the exception of BLD 02) the lower eight floors are proposed to be used for commercial/retail purposes. For BLD 02, the ground floor is proposed to be used for retail purposes.

Comment / Question: In the proposed development image shown below "Attachment 3 - Urban Design Statement Volume II - Page 68", of the following 9 Sites:

- **Site 6 - Building 6 – Retail / Workshop – 6 Storeys**
- **Site 7 – Building 7 - Mixed Use – 21 Storeys**
- **Site 8 - Building 8 - Mixed Use – 26 Storeys**
- **Site 9 - Building 9 - Mixed Use – 26 Storeys**
- **Site 10 - Building 10 - Mixed Use – 22 Storeys**
- **Site 10 – Building 10 - Mixed Use – 19 Storeys**
- **Bank Street Open Space**
- **Site 11 - Dragon Boat Storage & Launch**
- **Site 12 - Community/Creative/Retail**

there are at least 7 Towers and 2 open spaces that are "sensitive receptors" (residential uses and public open spaces) and proposed for this development within a 20 m radius of the Western Distributor. How can the Government propose a development that defies the consultant's Air Quality Assessment's Recommended Mitigation Measures, i.e. "it is recommended that no sensitive receptors be located within a 20 m radius of the major roads."?

Attachment 3 - Urban Design Statement Volume II - Page 68

Attachment 18: Noise and Vibration Assessment June 2021

Executive Summary

This Summary States: "The assessment confirmed that for most residential areas of the Precinct, road traffic noise impacts would be greater than industrial noise.

Road Traffic Noise
Road traffic noise was found to have the greatest impact across the proposed residential areas of the site.

Required façade attenuation would be greatest for bedrooms located on the Eastern façades overlooking the Western Distributor. To maximise the potential for natural ventilation, it would be recommended to locate other habitable spaces (such as living rooms) with attenuated or enclosed balconies on these façades.

Road traffic noise levels are broadly consistent across the same elevations of all buildings of the study area.

Acoustically upgraded glazing and/or attenuated balconies and acoustically attenuating ventilation solutions or mechanical ventilation would be required for a number of proposed residential facades in proximity to the Western Distributor.

Summary
The study has shown that from an acoustic perspective, the site is suitable for the intended uses within the SSP proposal, subject to future design development on final proposals and the high-level mitigation measures summarised within this study."

Comment / Question: The Noise and Vibration Assessment's Executive Summary states "The assessment confirmed that for most residential areas of the Precinct, road traffic noise impacts would be greater than industrial noise" but the Summary states "the study has shown that from an acoustic perspective, the site is suitable for the intended uses within the SSP proposal, subject to future design development on final proposals and the high-level mitigation."

Given this recognised challenge of the Towers requiring "high level mitigation" noise controls to meet the Government's prime objective for this project of being a "net zero carbon emissions", "5 Star Green Star – Communities" and "world class liveable urban community", wouldn't the Government be better advised to rethink the scale and location of the current proposed Tower development?

Attachment 19: Human Health Risk Assessment June 2021 Particulate Matter and Nitrogen Dioxide Volume I

EXECUTIVE SUMMARY
Results and Conclusions
Population Health Endpoint Assessment

This section states "The population health endpoint assessment undertaken in this HHRA has shown that for both long-term and short-term exposure, the altered exposure circumstances of the proposed development are predicted to provide an average net health benefit."

Comment / Question: Human Health Risk Assessment's Results and Conclusions states that given "altered exposure circumstances of the proposed development are predicated to provide an average net health benefit. Given the Government's prime objective of this project being a "5 Star Green Star – Communities" and "world class liveable urban community", is this development's "average net health benefit" an acceptable world class standard?

Attachment 20: Blackwattle Bay - Housing Diversity and Affordability May 2021

This Attachment states "As an example of the potential key workers that may be tenants in affordable housing:

- Very low income key worker households may include aged care workers, cleaners, nursing assistants and hospitality and retail staff.
- Low income key worker households may include teachers, emergency services staff, retail workers and nurses
- Moderate income key worker households may include senior nurses and teachers and social and emergency/community service personnel."

Key Matters

Extracts from "key matters" follow:

- Retaining and/or improving housing choice within the study area and City of Sydney is a real and growing challenge for lower income earners.
- People on very low or low incomes cannot afford to rent a 1 or 2 bedroom apartment in the City of Sydney. People on a moderate income could afford a 1 bedroom but not a 2 bedroom apartment.
- This lack of affordable rental housing has the effect of skewing the population of the City of Sydney where very low to low income households are denied entry to living in the area. This has the knock on effect of reducing a socially diverse and healthy community and access to key workers. In addition, this may result in the following costs to business and the wider community.
- Local industry will face additional costs with consequent impacts on competitiveness (e.g. job retention, recruitments costs etc.)
- Effectively, very low and low income households are locked out of the rental housing market in the City of Sydney.
- Cash contributions to community housing providers Blackwattle Bay has the potential to result in more and more sustainable affordable housing than the dedication of dwellings in the Study Area. "

Comment / Question: "Cash contributions" sounds good but what it really means is that this project is exonerated from having affordable housing in this development. As a compromise, a commensurate amount of money (equivalent value of say 5% of the apartment square metres) would be passed onto a relevant authority to build apartments and possibly not within the Greater Sydney Commission's objective of a "30-minute city".

Given our recent and ongoing experience with COVID, it is imperative that essential workers be close to their workplace and our fear is that by not having affordable housing designated as part of this project's build then key or essential workers may never have ready access to their workplace.

Also, as mentioned in this Report, "lack of affordable rental housing has the effect of skewing the population of the City of Sydney where very low to low income households are denied entry to living in the area. This has the knock on effect of reducing a socially diverse and healthy community and access to key workers. In addition, this may result in the following costs to business and the wider community."

If the "cash contributions" scenario is accepted then key or essential workers may never have ready access to their workplace and this development will result have a knock on effect of reducing a socially diverse and healthy community. Given this scenario, how can this project's prime objective of being a "world class liveable urban community" be achieved?

Comment / Question: This Study promotes 5% affordable housing but the community has always asked for a figure of at least 15% and include social housing. Many studies have found that a healthy world class liveable urban community is socially diverse so why does the Government not have a 15% affordable and social housing figure?

Attachment 22: Infrastructure and Contributions Review June 2021

This Report's "population and dwelling impacts" section states "*The largest forecast increases by age are in the 25 39 age bracket by 2036. This is partly the result of people migrating to the District in those age groups, as well as the ageing of early movers to the site in their 20s. There are also significant increases in the 50 to 64 age group."*

Comment / Question: Given this Reports demographic analysis it is apparent that there will be a significant increase in children, the 50 to 64 age group and retirees. To accommodate this range of people this development must include the following social infrastructure:

- **Child care / Preschool facilities**
- **Aged care facilities**
- **Library and Community Centre (facility that would accommodate a community meeting place / art, music, reading classes / domestic classes / technology (mobile phone and computer) classes / motherhood classes / diverse cultural gathering area / yoga / meditation, etc.)**
- **Community Health / Medical Centre**
- **Community Gardens**
- **Women's Refuge**
- **Men's Shed**

Why does the Government not include these facilities in their proposed development to ensure the project's prime objective of being "a world class liveable urban community" is achieved?

Attachment 28: Connecting with Country Framework for Tjerruing Blackwattle Bay – March 2021

Section 5.3 States "It is highly offensive to approach communities with an already established design and strategy to request approval and sign off for a tick-a-box outcome. Instead, Aboriginal communities should be engaged meaningfully, with a true desire to listen and learn in a respectful way that can ensure that their needs and requests are understood and implemented throughout all aspects of the project."

Comment: Community strongly agrees with and supports this statement.

Attachment 34: Environmental Site Assessment - June 2021
Site Condition and Environmental Setting

Executive Summary

Previously, the total land area was 8.4 hectares and water area was 23 hectares. However, part of the new SFM is being developed below the mean high water mark, increasing the overall land area of the study area to 10.4 hectares and reducing the water area to 21 hectares.

1.2 Objective

The objectives of the assessment were:
• **Identify, review and collate all available existing site** contamination and geotechnical assessment data as may be available for land parcels and **bay sediments** within the site area, inclusive of site (ground) condition observations and laboratory analysis results for contaminants of potential concern (COPCs);

2.1 Site Identification

Individual developments forming the properties occupying the site are discussed following, moving around Blackwattle Bay from south-west to north via the east site portion.

Table 2.1: Blackwattle Bay Study Area Property Details

Blackwattle Bay - Lot 107 DP1076596

2.2 Site Description

Blackwattle Bay – Lot 107 DP1076596 **comprises the majority of the marine foreshore and surface water areas** of Blackwattle Bay. Lot 107 DP1076596 further comprises the receiving waterbody from land-based properties within the Blackwattle Bay Study Area located in the southern and eastern portions of the site."

2.4 Acid Sulfate Soils

The area of the site covered in surface waters, is located within an area of 'high probability' of acid sulfate soils (ASS) within bottom sediments. In such areas, **there is the potential for severe environmental risk if bottom sediments are disturbed by activities such as dredging**.

4.3.4 Umwelt 2008 Review of Environmental Factors Pier Demolition 41-45 Bank St
A marine sediment contamination assessment completed by Douglas Partners Pty Ltd (DP 2008[18]) was presented within this document…….

Concentrations of heavy metals including arsenic, copper, lead, mercury and zinc in addition to organic compounds – TRH (C_{14}-C_{36}) and PAHs were reported in samples obtained within the site as well as those in the broader Blackwattle Bay.

4.3.15

Sediments within Blackwattle Bay directly to the west of the site were considered to be Potential Acid Sulfate Soils (PASS) and as such, any disturbance activities would require implementation of treatment and management measures as outlined in the ASSMP.

5.2.1 Areas of Known and/or Potential Concern
APECs and COPCs have been identified for areas/properties within the site on the basis of the identified former and current sites uses and available site assessment information.

- Placed fill and reclaimed land areas across the site
- Former coal wharf/loader (Lot 3 DP1064339)
- Current and former concrete batching plants
- Current and former industrial areas including petroleum product storage, timber yards, waste transporting, shipping, marine repairs, etc.
- Marina areas

5.2.2 Source of Impacts
- Heavy Metals and PAHs
- Petroleum Hydrocarbons (TRH/TPH)
- Volatile Organic Compounds (VOCs) including Monocyclic Aromatic (BTEX) Hydrocarbons
- Asbestos
- Pesticides and Herbicides (OCPs, OCPs)
- PCBs
- Organotin Compounds including TBT
- Ground Gases
- Acid Sulfate Soils

5.2.3 Potentially Impacted Media
Potentially impacted media have been identified as the following:
- soils;
- sediments;
- groundwater;
- surface water; and
- vapours (indoor and ambient air).

5.2.4 Potential Human and Ecological Receptors

Potential human populations whom may be exposed to contaminant impacts in the future (if they are not remediated or appropriate management is not implemented prior to or during development within specific areas of the Blackwattle Bay Study Area) include:

- Potential future occupants where residential development occurs;
- Future and current recreational users of public open spaces (including road reserves,
- parkland, public walkways, plazas, etc);
- Future and current recreational users of water bodies located within the site;
- Other

Exposure pathways for human receptors are anticipated to occur in the range from inhalation, ingestion or direct (dermal) contact with impacted media present within the site. This may include the potential for dermal contact with and ingestion of impacted soils / groundwater as present at shallow depths and/or accessible by future excavations by site workers, visitor and/or occupants or the potential inhalation of vapours migrating upwards and laterally from fill and/or natural soils."

Comment / Question: On reading this Environmental Site Assessment Report, the above extracts have been included to highlight that this Report virtually excludes the sediments in the Bay.

As stated "Blackwattle Bay – Lot 107 DP1076596 comprises the majority of the marine foreshore and surface water areas of Blackwattle Bay. Lot 107 DP1076596 further comprises the receiving waterbody from land-based properties within the Blackwattle Bay Study Area located in the southern and eastern portions of the site."

If you look at this Report's Figure 2a: Current Site Layout you will notice 2 things:

1. **The shallowness of the Bay**
2. **The large amount of contaminated sediment that sits in Blackwattle Bay.**

This Reports states "Potential human populations whom may be exposed to contaminant impacts in the future (if they are not remediated or appropriate management is not implemented prior to or during development within specific areas of the Blackwattle Bay Study Area) include:

• Potential future occupants where residential development occurs;
• Future and current recreational users of public open spaces (including road reserves, parkland, public walkways, plazas, etc.);
• Future and current recreational users of water bodies located within the site;

Question: Given:

1. **The overall water area of the Bay's proposed development is 21 hectares (67%) and land area is 10.4 hectares (33%). Why does the Environmental Site Assessment Report focus on the land and little consideration given to the Bay's toxic sediments?**

2. **The Government's objective to create a "world class liveable urban community" how can this be so when their proposed development appears to ignore 67% of the Study Area which has the potential to expose people to contaminant impacts?**

3. **People exposed to contaminant impacts in the future include:**
   - **Potential future occupants where residential development occurs;**
   - **Future and current recreational users of public open spaces (including road reserves, parkland, public walkways, plazas, etc.);**
   - **Future and current recreational users of water bodies located within the site;**

   Then why aren't contaminants in the Bay's sediment included in this Report?

Separate from the Environment Assessment Report, but still relevant, if you refer to this Report's Figure 2a: Current Site Layout, how are ferries going to access the designated Ferry Wharf given the shallowness of the Bay?

On referring to this Report's Figure 2a: Current Site Layout, given the shallowness of the Bay how will public ferries and large pleasure craft access the Bay without disturbing the contaminated sediments?

Attachment 39: Pedestrian Wind Environment Study Stage 2 - June 2021

This Report and Attachment 39 states, "Advise on measures to ensure the suitability of areas for their intended use with regard to the impact of wind on comfort and safety. In particular, this is to focus on the public space areas intended to be used for seating (i.e. the foreshore reserve, outdoor dining areas on footpaths and public plazas) and standing (i.e. building entries); and, also for outdoor private recreation areas to be suitable for sitting (egg balconies, decks and outdoor communal private open space).

Comment / Question: The Wind Environment Study refers to "Pedestrians" only and does not consider the 1500 new apartments with an approx. residential population of 3000 people.

If the Government's objective is to create a "world class liveable urban community" why does the Wind Environment Study only consider "Pedestrians" and not consider the impact wind may have on 3000 people living in the 6 to 45 storey Towers?

Attachment 41: Health Impact Assessment - June 2021

Comment / Question: The Health Impact Assessment's Report has not addressed all risks to this residential / commercial. How can you appropriately locate residential uses and have a "world class liveable urban community" when the proposed development of twelve 6 to 45 storey residential towers with a predicted population of 3000 people is built adjacent to and against the Western Distributor?

Comment / Question: The Health Impact Assessment's Report has not addressed all risks to this residential / commercial / public domain, such as shadowing, apartment wind, bay sediment contaminants, eastern side of Towers, etc.

It also talks about a community centre / club house as being the main panacea for social infrastructure which far from what has been asked by the Community Reference Groups.

The majority of this assessment is a combination of "motherhood" statements and platitudes, and does not have the gravitas of what a health impact assessment should be.

The Report's risk assessment findings are based on the consultant's opinion and not on what the community thinks.

174751

haymet

Pyrmont 2009

Please see attached file.

14 August 2021
605B/24 Point Street,
Pyrmont 2009 NSW

Personal Submission on Blackwattle Bay State Significant Precinct Study

As a long-term resident of Glebe and Pyrmont, I object in the strongest possible terms both to (1) the Blackwattle Bay proposals presented in the study and (2) the non-democratic and arbitrary method by which is was prepared.

(1) Existing failed Blackwattle Bay proposals

The extremely high and massive buildings presented – or anything close to them – will certainly destroy the solar and visual amenity of a huge fraction of Pyrmont. They stand in stark contrast to the thoughtful architecture of the new Sydney Fish Markets, and approach the wantonly bad and disrespectful proposal recently comprehensively rejected at all levels for "The Star" 6 star hotel.

This rejected hotel stands as proof that the NSW planning process can – and frequently does – gets things 100% wrong, and this Blackwattle Bay proposal is in that same failed category.

As an outcome of the corrected consultation process advocated below, these building should be entirely replaced by detailed recommendations for small low buildings comparable with the heritage of our Pyrmont & Glebe, set back from the waterfront, and so drastically reduced in size that a green public park can be provided between the development and the new fishmarkets.

Parkland should be given priority over the privatization of this publicly owned asset.

(2) Genuine consultation process for a way forward

A long and previously successful community consultation process has recently been perverted by the infamous "3 scenarios" scandal.

The "Animal Farm" language contained in the report is unworthy of our Pyrmont community, our state of NSW, and indeed Australia. Presenting "3 scenarios" all equally unacceptable, with no options for "none of the above", is a transparent and scandalous low point in the 10-year history of this NSW government. Equally unacceptable is the deceptively labelled "Simplified" Attachment 10, Explanation of Intended Effect, which claims to provide a "simplified planning framework that is easier to understand and navigate…" (p5). Upon examination, on the contrary, it exempts plans for the public domain from all current assessment requirements. In addition, were the previously unannounced Government proposals to amend the Environmental Planning and Assessment Act (not mention in the last electoral cycle) to be passed by Parliament, the Government will assume for itself "unfettered powers to implement other reforms without parliamentary scrutiny".

The government's own *Revitalising Blackwattle Bay* (May 2020) clearly rejected the building heights presented. Tall buildings… "were not generally regarded as being appropriate for a harbourside location" (p4) was a classic understatement of the uniform views expressed by community members and reported correctly.

Simply put, I and our community demand compliance with SREP 26 provisions and rejects the State Significant declaration and amendments to the Sydney LEP to permit obscene maximum building heights.

A. Haymet

183246

Hayward

GLEBE

Please find the attached submission regarding the Blackwattle Bay Precinct.

Regards,

Andrea Hayward

52 Talfourd Street

Glebe NSW 2037

M: 0438953004

Andrea Hayward
52 Talfourd Street
Glebe NSW 2037

20th August 2021

Re: Blackwattle Bay Precinct Study

Dear Department of Planning,

I am writing to support the submission made by the Bays Water Club Collective and the Glebe Society to the Blackwattle Bay Precinct Study.

Over the course of the last century the local community have seen intense industrial use of The Bays come and go. We understand innately that redevelopment of The Bays represents a once in a generation opportunity for our community and for Sydney.

I support the revitalisation and the rehabilitation of The Bays and believe that can take place in a manner that is consistent with community values.

I also understand the significant impact that short-sighted planning decisions made today can have on future generations tomorrow.

I want to ensure this once in a generation opportunity to rehabilitate and revitalise our harbour is not wasted.

The current plan for Blackwattle Bay fails to achieve this.

For those reasons, the broad response to this precinct study is that we would like to see our government put forward:
A plan to support and grow community infrastructure
A plan to safely manage the growth in maritime traffic
A plan to protect and expand access to public open blue space
A plan to rehabilitate the natural harbour environment
A plan to elevate the ancient history of The Bays
We hope that the government takes this opportunity to set a standard for development on The Bays that the entire community is able to support.

I am a rower at the Glebe Rowing Club. The rowing course has already been limited by the fish market footprint and I completely disagree with the plan to create private marinas on the Pyrmont side of the day where the fish markets are.

Public space is a premium in Sydney and I'd like to see the amount of public space in line with the 50 per cent applied at Barangaroo.

I am also concerned at the minimal amount of public housing earmarked for the development at a time when the NSW government is actively selling off multi-million dollar properties in Glebe and surrounds. It does not appear the proceeds from these sales is being used to fund adequate levels of public housing in this development plan.

The plans amount to a massive over development of the site.

It will see Pyrmont further disconnected from Blackwattle Bay by a massive wall of buildings.

The lack of useable green space will be in shadow.

The width of the foreshore is a measly 10m wide in places and the area is already busy with cyclists, joggers and walkers let alone with the planned residences.

Public transport is already struggling to keep up during normal times, with the light rail packed during peak times. It cannot withstand further capacity.

The planned development will create wind tunnels and ruin the amenity of the area. It will also change the iconic skyline from the Glebe side of Blackwattle Bay, for the worse.

The foreshore promenade will be overshadowed by the height of the buildings and not provide the lovely foreshore walk that connects us with Pirrama Point and Pyrmont.

I lend my support to all the recommendations in The Glebe Society's submission: https://www.glebesociety.org.au/wp-content/uploads/Blackwattle-Bay-SSP-submission.pdf

And I also wholeheartedly support the Bays Water Collective submission: https://onedrive.live.com/?authkey=%21AH5iQjceDXesHLM&cid=F3F4762C18C8021C&id=F3F4762C18C8021C%21121&parId=F3F4762C18C8021C%21104&o=OneUp

Please let common sense prevail and reduce the height of the towers and create a truly useable public space.

Yours truly,

Andrea Hayward

181061

Hilliard

GLEBE

See attached Objection Blackwattle SSP

19 August 2021

RE: Blackwattle Bay SSP Study

Dear Sir/Madam

We write to object to the planning scenario put forward in the Blackwattle Bay SSP Study.

The proposed buildings are overscaled, in particular those buildings exceeding 15 storeys. This will have a significant visual and environmental impact on the amenity and heritage character of the locality.

The proposal should be related to the predominant building heights of the surrounding development directly to the north, east and south of the site which are 2 - 15 storeys high.

The public domain would be completely dominated by the height of the buildings surrounding them. There is not sufficient width in the site to establish any meaningful scaling from the top of the towers to the waters edge.

The proposed height of the buildings will have a significant overshadowing impact on the public domain, particularly Wentworth Park. Claiming there will be no overshadowing impacts is disingenuous at best. There are no overshadowing studies between 9AM and 12PM in the Urban Design Statement. Why? Because it would show the development having a significant impact on Wentworth Park. The studies should have been conducted at hourly intervals as a minimum. This is usually a requirement of even the most basic DA's.

There is no justification in planning terms to construct buildings that at 45 storeys high are more than double the height of any development on the Ultimo/Pyrmont peninsular. One can only assume that the building height has been set up to maximise capital gain and/or to establish a precedent for future development at the expense of the local community. For this reason the proposal is particularly disgraceful.

Yours faithfully,

Michael Hilliard
Architect

182646

Hodgson

Pyrmont 2009

Submission on State Significant Precinct - Blackwattle Bay

To Whom it may concern,
Department of Planning, Industry and Environment
Blackwattle Bay redevelopment submission

As the resident/ owner of Bayview apartments 79, 120 Saunders St, Pyrmont NSW 2009 we had received notification of the development plans submitted for Blackwattle Bay redevelopment along with the technical documents as plans on display. The current plans call for significant mixed-use development along Bank street with towers close to 18 stories and adjacent buildings even higher.

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:
- 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.
- 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.

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:

- a) assessment done for 120 Saunders Street now to ensure the current noise pollution as per the standards incorporated into the development
- b) ensure take the above assessment into account when factoring the building heights of the proposed construction
- c) provide noise & vibration reduction for current & future residents by putting large glass panels along the Anzac bridge to deflect the noise
- d) 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 Unit 79, 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.

Looking forward to a favourable and considerate response.

Yours faithfully,

Mrs Trina M Hodgson
Unit 79, 120 Saunders Street
PYRMONT NSW 2009

176616

Holmes

Pyrmont

I support the content discussed in the attached submission from CUPA

Submission on Blackwattle Bay State Significant Precinct Study
Council of Ultimo/Pyrmont Associations (CUPA)

The proposal to develop Blackwattle Bay has many attractive features. However this proposal should not proceed before the Pyrmont Peninsula Place Strategy is finalised.
Sydney Harbour is one of the finest harbours in the world, and it is the government's intention to create a world-class fish market precinct. **This will not be achieved by this Precinct Plan**. The overall impression created by the plan is that the government needs to maximise its income by enabling developers to build massive towers on the foreshore and sell this property to the highest bidder. The towers will create a wall of buildings blocking the surrounding area, overshadow much of the foreshore and surrounding streets, and produce wind tunnels on the foreshore walk and between the buildings.
The proposals to amend existing planning legislation will enable these towers to be built without further community consultation, and deny affected community members any role in future plans for the precinct.

Blackwattle Bay needs a master plan
Why is there no Master Plan for the area - including future use of the Glebe Island Bridge for pedestrians and active transport? Glebe Island Bridge is a critical asset – it needs to be brought back to life for cycling and pedestrians. The Pyrmont Peninsula Place Strategy assured us of a planned strategy for the whole area. Now we are asked to accept piecemeal planning without considering increased traffic and parking, no indication of how better public transport will be introduced, and no reference to public infrastructure like educational, medical and aged care facilities, a men's shed, a women's shelter.

Blackwattle Bay should not be an extension of the CBD
The assumption that Blackwattle Bay should be an extension of the CBD is unreasonable and inappropriate. Pyrmont and Ultimo are primarily residential, and already among the most densely populated suburbs in Australia; and Blackwattle Bay forms a bridge to Glebe. All have a long history as residential suburbs: changing the planning regulations to enable the bay to accommodate enormous commercial and residential towers is much more about allowing developers to exploit the harbour foreshore than any public benefit. Planners have developed Darling Harbour as a wall between the city and these suburbs.

Local residents should not have to pay for a Sydney/NSW-wide facility
The huge towers are presumably to help pay for the new fish market. This development will benefit the whole of Sydney, support the entire seafood industry of New South Wales, and provide great opportunities for interstate and international tourism, boosting the state's economy. Pyrmont residents should not suffer loss of views of the harbour, overshadowing and wind tunnels between towers as they walk around the harbour foreshore. Benefits for the State's economy should be paid for by the whole State.

Developer contributions are needed for vital local infrastructure
The proposal that developer contributions go into the state coffers will jeopardise community benefit. Increased number of residents and workers will require more social infrastructure, including community facilities, schools and medical facilities. Developer contributions should not be directed to other areas, but will be needed by our community, and expenditure of these funds must be transparent and accountable.
The community facilities described in the plan are completely unfunded.

Over-tall towers will form a wall between Pyrmont/Ultimo and the harbour and between Pyrmont and Glebe
A principle of the Pyrmont Peninsula Place Strategy is that new buildings should respect the character of the surrounding area. At most towers should be no higher than the tallest buildings in Jacksons Landing. They will also create a wall between Glebe and Pyrmont. View sharing is an equitable principle in residential areas. These towers will prevent sharing views of Blackwattle Bay from surrounding areas.

Exposure to air and noise pollution
The proposal recognises that the proximity to a busy road network and the Anzac Bridge will involve extreme vibration, noise and air pollution. Windows will need to be closed to manage noise, ruling out natural ventilation.

Overshadowing and wind in parks, walkways and surrounding area
Sunlight in new parks is less than the City of Sydney's requirements. Few, if any, streets will have the sunlight required for tree growth. Overshadowing of existing dwellings south of Pyrmont Bridge Road is not adequately addressed. Excessive wind between tall towers will make walkways unsafe and seating uncomfortable. Wind and overshadowing throughout the precinct will inhibit tree growth. Trees are vital for purifying air, cooling the ambient temperature, and contributing to people's mental health. The promenade will be in shade from 6.30-10am – hardly a "world-class" harbour foreshore promenade!

2,800 more residents should not be added to an already dense population
Excessive height and girth of residential towers will bring too many new residents. Traffic on surrounding roads will be increased in a network leading to the Anzac Bridge, which traffic engineers say is already at capacity.

Residents are entitled to see Blackwattle Bay
Blackwattle Bay is a tranquil and beautiful cove, with a long indigenous and settler history. Plans should enable as many residents as possible to enjoy their proximity to Sydney Harbour. The proposed towers will steal this outlook from most of the surrounding area, for the benefit of new residents who can afford to buy into these towers. Not only will they block views, but they will also block sunlight for much of the day for large stretches of nearby land, including the proposed foreshore walkway and community open space, and create wind tunnels between them.

Traffic will increase to unmanageable levels
Traffic in this road network is already very congested. There are no proposals to increase public transport. The Pyrmont Metro station is years away and at a distance; no more light rail stations are being considered; there are no current plans for a ferry service; and the plan for parking is to have no more than the existing number of spaces. Most visitors to the fish market come to buy seafood. Very few will want to carry their seafood esky home on the light rail, the metro, the ferry or the bus, so the surrounding streets will have to accommodate increased parking, creating further congestion and denying parking for residents.

Private landowners will benefit disproportionately
Once the land along Bank Street is rezoned, Poulos Bros Seafoods Pty Limited, Celestino/Baiada Poultry Pty Ltd. and Hanson Australia Holdings Proprietary Limited will benefit hugely from sale of their land. The higher the new buildings on this stretch of land, the more disadvantaged the current residents. How does this fit the approach advocated in the plan: "… development potential to be distributed fairly & impartially"?

More open space and sports facilities are needed

Pyrmont has several parks, but no full-size courts for any team sport. Apart from building fitness, team sports build a sense of belonging, working together, adherence to rules. Maybanke Recreation Centre must be developed into a purpose-built sport and active recreation centre, which will serve the community and the wider Inner West. Developer contributions from Blackwattle Bay should be dedicated to this much needed facility. 94% of housing in Pyrmont is apartments, needing much more outdoor space for children than families who live in houses with backyards. We cannot just rely on Wentworth Park which is shared by Pyrmont, Ultimo and Glebe. As soon as the current greyhound lease expires, it should be devoted to local sporting activities, with the possibility of including a high school, and perhaps extending the Ultimo Primary School when this is needed.

What is the health benefit to our community?

This development should provide an excellent net health benefit. The proposal promises a world class, 5 star precinct to benefit residents, workers and visitors. But overshadowing and wind will prevent it reaching its potential for those wanting to walk, run, cycle, sit or relax, whether for physical or mental health.

Some urban heat and mental health impacts can be mitigated by biodiversity - trees make it cool to walk. With proper planning we could have majestic tree canopies with birds beside a world class Australian city foreshore walkway.

Proposals to amend planning legislation deny democratic planning

The state government undertook to return planning powers to the people! What is proposed is diametrically opposed. Current legislation in the Sydney Regional Environmental Plan:

SREPP Section 25 Foreshore and waterways scenic quality

(a) The scale, form, design and siting of any building should be based on an analysis of:
    (i) The land on which it is to be erected, and
    (ii) The adjoining land, and
    (iii) The likely future character of the locality.

(b) Development should maintain, protect and enhance the unique visual qualities of Sydney Harbour and its islands, foreshores and tributaries.

(c) The cumulative impact of water-based development should not detract from the character and adjoining foreshores.

SREPP Section 26 Maintenance, protection and enhancement of views

(a) Development should maintain, protect and enhance views (including night views) to and from Sydney Harbour,

(b) Development should minimise any adverse impacts on views and vistas to and from public places, landmarks and heritage items,

(c) The cumulative impact of development on views should be minimised.

The Department's aim is to repeal existing legislation so as to permit creation of excessively large buildings along the foreshore of Blackwattle Bay. This will contravene much of the established requirements for planning in Sydney, and especially around Sydney Harbour.

It also proposes to limit the approval of major development proposals (>$10 million) to the control of a single Planning Secretary. This may speed up decisions about significant developments, but opens the door for influence by vested interests, and denies citizens the right to participate in any consultation and decision-making.

Foreshore promenade must be 30m wide

Completion of the foreshore promenade around the harbour - one of the most important tourist facilities in Sydney. It must be 30m wide all the way. Given the anticipated number of visitors and the need for residents in surrounding suburbs for more open space - pedestrians, cyclists, dog-walkers, families with prams, kids on bikes and scooters – squeezing the walkway back to 10m at some stages will create serious congestion and not allow for physical distancing at times like the present pandemic. The lack of separated cycleways and walkways is already a problem along the Glebe foreshore. Some Glebe residents are currently avoiding the Jubilee Park foreshore walk out of concern for overcrowding.

Consider and respect our history:

In 1831 under Governor Darling, the Surveyor-General of the colony of NSW Thomas Mitchell introduced Clause 14 to the NSW Land Regulations [Syd Gaz 4 Aug 1831]: "No land within one hundred feet of the high water mark on the sea coast, harbours, bays, or inlets, is to be considered open to purchase, unless for the purposes of commerce or navigation."

Indigenous history, heritage and culture must be honoured

The plan calls for a significant representation of indigenous history, heritage and culture. This will only be achieved by including housing for Aboriginal people who can engage with the local community, and contribute to the proposed activities, for example in the gathering circle. We also need a cultural/learning centre in a proper place for students and the community to show where they belong. There must be a permanent Indigenous presence. Otherwise they are unlikely to have any connection with people who can afford luxury apartments in high-rise buildings on the harbour foreshore.

Genuine commitment to public and affordable housing

Key workers need to be close to the city. The plan proposes 5% of the housing for nurses, teachers, community support workers, police, ambulance and emergency officers, delivery personnel and cleaners. This is 78 apartments and will not accommodate all the key workers who are needed. Further the plan suggests that funds could be diverted to other places, effectively removing the government's commitment to this essential housing. Many other jurisdictions have much greater commitments to housing key workers – eg the City of Sydney advocates 25% of housing to be affordable on government-owned land. We support the City West Housing model whereby tenancies enable people of different income levels to stay in the same place.

The provision to allow monetary contributions in lieu of direct investment in affordable housing offers no guarantee of affordable housing in Blackwattle Bay.

More public open space needed

The amount of public open space proposed is only 30%, and much of it is in shade under the approaches to the Anzac Bridge. Planning for Barangaroo allocated 50% open space. Pyrmont is 94% apartments. Ultimo is getting more high-rise. School-age children attend a high-rise primary school. Wentworth Park is shared between 3 suburbs. There is a much greater need for active playing space. Kids and young adults need space to kick a ball, run around – vital for their mental and physical health.

Community consultation

The documentation includes this statement:

The principles for a future Blackwattle Bay were formed through extensive community consultation in August 2017. These were further developed in 2019, together with a vision for the precinct. These have guided the development of the Precinct Plan and will continue to guide future development proposals within the Study Area.

1. Improve access to Blackwattle Bay, the foreshore and water activities for all users.
2. Minimise additional shadowing to Wentworth Park and Glebe Foreshore (in mid-winter) and create new places with comfortable conditions for people to enjoy.
3. Pursue leading edge sustainability outcomes including climate change resilience, improved water quality and restoration of natural ecosystems.
4. Prioritise movement by walking, cycling and public transport.
5. Balance diverse traffic movement and parking needs for all users.
6. Link the Blackwattle Bay precinct to the City, Glebe Island and White Bay and other surrounding communities and attractors.
7. Mandate Design Excellence in the public and private domain.
8. Integrate housing, employment and mixed uses to create a vibrant, walkable, mixed use precinct on the city's edge.
9. Maintain and enhance water uses and activities.
10. Allow for co-existence and evolution of land uses over time.
11. A place for everyone that is inviting, unique in character and socially inclusive.
12. Expand the range of recreational, community and cultural facilities.
13. Plan for the future community's education, health, social and cultural needs.
14. Deliver development that is economically, socially, culturally and environmentally viable.
15. Embed and interpret the morphology, heritage and culture of the site to create an authentic and site responsive place.
16. Foster social and cultural understanding and respect to heal and grow relationships.

As we have shown, most of these principles have been abandoned. We urge the government to go back to the drawing board, and create a master plan for Blackwattle Bay that respects the above principles, and proposes a genuine world class precinct that will accommodate the needs of our community and build a Blackwattle Bay precinct of which Sydney and New South Wales can be proud.

164116

Hutchinson

Lilyfield 2040

Please find attached submission outlining my disappointment. and concerns on this proposed development.

Submission to the Blackwattle Bay State Significant Precinct Study (SSP Study)

As a local resident and frequent user of the foreshore area I am very disappointed in the outcomes of the study and subsequent plans. They fail to address the urgent need for social and affordable housing, and the need for public open space. What this seeks to do is privatise our harbour foreshore.

The proposed dwellings are in direct contradiction to the principles outlined in the SSP. The only Objective that will be met by the following proposals is Objective 9 which "Optimises financial and economic benefits to NSW".

The overriding issue is the scale of the proposed blocks that will completely overshadow the area both physically and environmentally.

There will be 4x 24 storey towers

5 x 8 storey towers

3 up to 34 storey towers each on an 8 storey street wall = 42 stories x 3.

Although in favour of a redevelopment of the “old” Fish Market and surrounding area the height of these towers will dwarf the existing pylons of the Anzac bridge to put this into a scale perspective and ironically even overshadowing the future Fish Market’s solar panel roof.

None of these high density options for housing complement the area. They will only benefit developers.

This is a short-sighted option which flouts the opportunity to carefully grow this part of the city. It is completely out of scale and does not fit with the evolving character of the area. There is no diversity of housing on offer with low to medium housing as there is in Pyrmont, Balmain and Glebe.

The consultation process to date has been questionable with the curious Community Reference Group represented by no less than 5 district football clubs, what has a footy team in Canterbury to do with the community benefits in is area ?. Why no room for a community-based residents group from neighbouring Pyrmont, Lilyfield, Rozelle or Balmain?

Residents still want better access to the site by the public over and above redevelopment of the site, including the Fish Market and **nothing has changed**. The Berejiklian government and the Minister for Planning do not appear to care about the community needs regarding the Blackwattle Bay SSP. They are too interested in meeting the needs of the developers over longer term planning which aims to support community driven change.

Think again and listen to the community this is supposed to serve.

165786

Jessup

Pyrmont 2009

Full submission in file Jessup Submission July 2021 downloaded.

Submission summary:

I strongly believe that the excessive building heights proposed in the â€œBlackwattle Bay â€“State Significant Precinct Study June 2021â€ should not be allowed as they destroy the character and history of the Pyrmont community area, block views and cause terrible over shadowing of the Pyrmont area.

Submission: Blackwattle Bay – State Significant Precinct Study June 2021

Dr Bryan Jessup & Ms Jenni Jessup

101/15 Pirrama Road, Pyrmont, NSW 2009
bjes4741@bigpond.net.au
Mb: 0402 226 141

Document: "Blackwattle Bay –State Significant Precinct Study June 2021" (ref. 1)

Review comments:

1) I note the maximum building heights applying to the site under SLEP 2012 ranged from 15m to 33m; as shown in Figure 24 (ref. 1). I was thus very frustrated to note in Figure 28 of (ref. 1) that now in area 2 there are plans for 4 towers with 14 to 20 storeys above the 4 storey podium. That implies up to 24 storey towers. Further, in area 3 Fig. 28 (ref.1.) there are 3 towers 21-34 storeys above the 8 storey street wall! These facts are also shown in Table 9 of (ref.1) under "Proposed maximum building heights and GFA". The latter Table gives the maximum building heights of BLD 02 120m, BLD 03 156m! and BLD 04 of 110m.

   I strongly believe these excessive building heights destroy the character and history of the Pyrmont community area, block views and cause terrible over shadowing of the local business area. Further, I note that even the report indicates in Fig 41 (ref.1) that the buildings will cause morning over shadowing of the Fish Market and would affect the use of solar panels on the roof of the Fish Market at this time!

   The maximum height of buildings in the area adjacent to the new Fish Markets should not exceed the maximum height of buildings currently located in and adjacent to Jackson's Landing Pyrmont. That is similar to building heights proposed in Area 1 of Figure 28 (ref.1)

Document: " Clouston Associates, Attachment 15, Visual Assessment June 2021" (ref. 2)

Review comments:

1. I do not believe that the assessment given in reference 2, noted above, accurately reflects the impact that large multi-storey buildings will have on the environment and character of the local Pyrmont community and business areas.
2. I believe the assessment (ref. 2) deliberately sets out to minimise the impact of these massive structures to the reader. Note by example Page 85 View Point 9 (ref. 2). The latter view point from the walk above Jones Street Pocket Park as given in ref. 2 is shown on the left-hand-side (LHS) of the review submission Figure 1. Question 1, why didn't Clouston Associates use the same photo for making a visual assessment with and without the proposed building towers? Indeed, why was a photo chosen with dark storm clouds to give

the visual impact without the proposed towers and a photo with light clouds and blue sky to demonstrate the visual effect of the proposed towers?

3. Adding to comment 2 above why are the proposed towers shown in such a transparent manner that allows the reader to look through the building's see-through form to continue to enjoy the blue sky and clouds? I believe a more valid visual assessment is given by comparison with the modified photo given at the bottom of the right-hand-side (RHS) of Figure 1 of this review submission. The true visual impact is frightening!

Review submission Figure 1

Above LHS: Original View Point 9; (ref. 2) Above RHS: View Point 9 with buildings defined.

4. A second example of how the assessment by Clouston Associates (ref. 2) fails to give the reader a true guide on the visual impact of the proposed new buildings at the new precinct is given in Figure 2 of this Review submission (page 3). The true impact of such enormous towers on the community and business areas of Pyrmont is truly soul destroying and frightening!

Photomontage view of the precinct

Photomontage view of the precinct

Review submission Figure 2

TOP: Original View Point 12 (ref. 2) with figure having see-through building added images.
BOTTOM: View Point 12 with building structures shown in a solid colour format.

Submission summary:

I strongly believe that the excessive building heights proposed in the "Blackwattle Bay –State Significant Precinct Study June 2021" should not be allowed as they destroy the character and history of the Pyrmont community area, block views and cause terrible over shadowing of the Pyrmont area.

182441

Johnston

Balmain 2041

see attached file

Objection: Blackwattle Bay State Significant Precinct Study

Scale and height of buildings

The proposed building envelope is far in excess of a reasonable height given the surrounding residential areas. The proposed building height make the existing multistorey unit blocks in Pyrmont miniscule. If the height of these buildings is approved, why shouldn't the heights of the unit blocks in Pyrmont be increased to the same level? The heights of the proposed unit blocks should be no higher than those in Pyrmont.

Demand for units and construction impacts

There has been no analysis of the demand for the heights of the proposed buildings. COVID has caused the demand for houses to expand considerably while demand for units has remained stable. It appears that the project is being developed on a piecemeal basis and limiting supply rather than developing all the sites in the same timeframe. The staggered development approach means that surrounding landusers will be subjected to years of building development impacts causing noise and parking issues. Experience with the WestConnex development has shown that construction vehicle parking is a major nuisance factor and developers have not been imposed with any form of restraint to reduce and control construction vehicle parking.

Sustainability

The Aecom assessment is substantially dated by the omission of the need for urgent action to address carbon emissions. The claim that demand for gas will not change till 20 or 30 years is not supported by the evidence.

Aecom page 21 makes this claim:

"At present, mains natural gas has lower carbon intensity than NSW grid electricity for thermal end-use purposes. However, this is expected to change over the next 20 to 30 years as large-scale renewables continue to come online in the electricity network and drive grid decarbonisation and as more unconventional sources of gas are explored."

It would appear that Aecom has failed to identify the urgency to address carbon emissions. Including gas infrastructure as part of a major new building project in 2021 for a 40 year life (beyond 2050) would be totally irresponsible and negligent. Other States have already banned new gas reticulation infrastructure. This project must do likewise.

Aecom makes the following claim on Page 28

"By 2040, EVs are projected to account for 70 to 100 per cent of new vehicle sales and at least 30 per cent of the vehicle fleet in Australia." CSIRO has updated this projection to 70% of new cars being EVs by 2030 and 100% EV by 2040. Aecom projections are out of date. It is respectfully suggested that Aecom's claims be rejected as being inconsistent with the best available predictions. The proposed development must incorporate EVs as an integral feature including vehicle 2 grid energy supply. During the development phase of this project, it is also likely that wall mounted photo electric devices will become a standard feature of sustainable development.

Aecom makes many references to energy demand arising from building design and operation. The current building standards are quite lax and it is relatively easy to obtain top ranking. International best practice is of a much higher standard than the current crop of Australian criteria. Air leakage testing should be mandatory. Climate change and increasing temperatures will impose an even

greater challenge on the energy efficiency criteria. The imposition of natural ventilation needs to confront the increase in air temperatures that will occur under a changing climate.

Air Quality

The proposed Blackwattle development is the most concentrated residential development ever proposed in Australia immediately adjacent to a 6 lane elevated major thoroughfare. There are no international best practice standards which would recommend such a development take place in a first world country.

The air quality assessment performed by SLR is lacking in any actual measured data of existing air quality in Blackwattle Bay. The proponent has had four years to install an air quality monitoring station and obtain actual data on the existing levels of air pollutants. With no existing data, there is no opportunity provided to assess the validity of the claimed predicted air quality.

The Infrastructure SEPP (ISEPP) includes interpretive "restraints" relating to new residential areas located in close proximity to major roads. The "restraints" consist of residences "as far as practicable" and ventilation intakes as being "as far as practicable" from the roadway. Essentially ISEPP effectively places no restrictions on the colocation of roads and new residential areas. This is not consistent with best international practice.

The NEPM AAQ for NO_2 is now 80ppb for 1 hour and 15ppb for 1 year. The claim by SLR to use the old standards is rejected as the life expectancy of the proposed residential towers is well beyond 2040. Again SLR is out of step with the particulate criteria for $PM_{2.5}$. The assessment report should be updated to the standards that are applicable over the life of the buildings.

The model used by SLR is based on using "background" air quality data as being that from the Rozelle site. There is no critical analysis provided to support this arbitrary claim. What effect will the Hansen concrete batching plant have on air quality at Blackwattle? What effect will the multi-stacks from WestConnex and the Western Harbour Tunnel have on the air quality? No pollution controls are required on these stacks. The stacks are not subject to load-based licensing. No emission controls have been imposed on the operators of the stacks. Given the air movement patterns in the early morning period, the proposed Blackwattle towers will be downwind from the stacks and be subject to high levels of unregulated pollution. The Rozelle air monitoring station has no such air pollution stacks downwind of the site in the early morning period. The Rozelle site has not shipping facilities located within a kilometre of the site. There is no industrial factories near the Rozelle site as there is a Blackwattle. It is reasonably likely that the claimed "background" air pollution levels at Blackwattle are seriously in error.

The proponent has not provided any assurance that the modelled air pollution levels will be achieved. What happens if the actual air pollution levels are 20% higher than predicted? Is there any the developer could take to reduce the levels of air pollution to those predicted? What happens to future residents in that case? There are no examples of action that has been taken where predicted air pollution levels in large scale residential developments have not been met. In the case of the Blackwattle project, as it is likely no air quality monitoring station will be established to confirm the model "predictions" there will be no action should non-compliance occur as non-compliance assessment methodology has not been proposed by the proponent. This is the reason that the claimed "background" air pollution levels must be subject to critical review.

The insistence of residential buildings being naturally ventilated is highly problematic given the proximity of the buildings to Anzac Bridge and extremely high levels of air and noise pollution. The insistence on natural ventilation will see health impacts compromised. If these towers are built for

residential accommodation, then the health of residents must be protected based on current scientific evidence. Consideration of the principles of ecologically sustainable development (ESD) demands that health risks are addressed up front.

Only air pollution modelling is provided. The model does not include the stack emissions from the Rozelle Interchange and Western Harbour Tunnel. Both projects are approved and will be developed. Shipping emissions are not included.

Claim page 27 “newer vehicles produce significantly less emissions than older vehicles” is not supported by the latest data which shows that newer vehicles are of greater weight and produce higher levels of air pollution. The ongoing failure of the Federal Government to introduce new motor vehicle emission standards makes any prediction of future emissions questionable.

The assessment has not included air pollution emissions from the recently approved development for Hansen Concrete at Glebe Island.

The use of the Rozelle data as the source of existing background air quality at this site is not supported. The Rozelle site is approximately 250 m from Victoria Road. In contrast, this site is fronting the Anzac Bridge which is a six lane road that has reached capacity in peak hours. The only valid claim that could reasonably be made is that worst case high air pollution days at the Rozelle site would be similar to the air pollution levels at Blackwattle.

The proponent has not identified any issues arising from the location of outside air intakes for ventilation and air conditioning systems. What risks arise to building occupants caused by the use of polluted outside air? What air pollution criteria applies to pollutant concentrations in outside air intakes? Who is the regulator of “fit and proper purpose” in this application? The documents do not discuss and identify a regulatory approach to this issue. This issue must be incorporated into the planning requirements for the proposed rezoning.

Noise

The proposed rezoning will establish a huge number of residential premises in very close proximity to the Anzac Bridge and associated road network of overpasses and underpasses. The close proximity of major 24 hour multilane roads makes building design very constrained to achieve the 35dB(A) L_{Aeq} during the night-time 10pm to 7am. The 10dB(A) allowance for windows open is very generous and may cause bed pillow noise levels to well exceed the presumed 35dBA() criterion.

The generalised nature of the proposed building construction designs needs to be much more detailed to ensure that the specific noise criterion will be met at each residential unit. Given the number of floors and the opportunity for building works changes from floor to floor, compliance testing needs to be completed for each unit rather than done as a batch.

None of the ambient noise monitoring data sets did not include at least 7 days of valid data. Additional ambient noise testing needs to be performed after COVID travel restrictions have been lifted.

Multiplicity of constraints

The proponent has not identified the combined effect of restraints with respect to air quality requirements and achievement of the specified noise levels inside residences with different levels specified for bedrooms and other living areas. Apart from using obsolete air quality criteria, the design documents do not integrate the noise and air quality criteria and produce building layouts that will satisfy both requirements. The building design is not an either or. Both criteria apply and

both need to be complied with. The “reasonable and feasible” clause when applied to non-compliances which have health effects, mean that developers evade proper design requirements. Future property owners suffer those health impacts that would have been avoided had measurable and specific building requirements been met.

Past experience has seen that planning controls can be granted generous “compliance” requirements. Each breach of a compliance requirement transfers a cost on to the future property owner. This is unfair to all other property owners who have not been granted a generous compliance interpretation.

Conclusion

The documents used to support the State Significant Precinct (SSP) do not address the environmental impacts that will be imposed on future property owners with respect to air and noise pollution. The height of the development greatly exceeds that of the surrounding landscape. The Blackwattle SSP, if approved, will be a long term environmentally questionable development that will knowingly impart dissatisfaction and harm on its occupants unless the proposed plans are radically changed.

183441

Kanagaratnam

Pyrmont, 2009

19/08/21

Natalie Khoei & Anosh Kanagaratnam

169/102 Miller St, Pyrmont NSW 2009

Attn: NSW Government

RE: Blackwattle Bay Precinct Plan â€" Urban Design Statement

Thank you for your redevelopment proposal for Blackwattle Bay. Please see below the design principles of which we are in agreeance with however we feel they were neglected in some instances (approximately half- which are listed below) with the plan proposed. After discussing the principals and how well the proposal aligns with your proposal for redevelopment, we will provide our recommendations for another proposal to provide an all encompassing solution.

Principal 1: Improve access to Black Wattle Bay, the foreshore and water activities for all users.

Unfortunately the proposed plan further limits access to Black Wattle Bay, the Foreshore and water activities due to the proposed development of extensive commercial and residential spaces.

With an increase in residents and businesses, this has obvious implications for access to the foreshore physically from both an infrastructure point of view and availability/access point of view due to the increased foot traffic and car traffic in the area.

Principal 5: Balance diverse traffic movements and parking needs for all users.

Sadly, the roads surrounding pyrmont already struggle with traffic in the mornings and afternoons (Miller street, Harris Street, Pyrmont Bridge Road and Bank Street) and there is no doubt that the increase in business and residential activities will put a further strain on this already existing problem.

Road works proposed will not be sufficient to meet the needs of Pyrmontâ€™s residents with this proposed plan for development.

Principal 9: Maintain and enhance water uses and activities:

As access has been reduced to the water foreshore with the proposed development of mixed commercial/residential buildings, current water use and activities are not able to be maintained as most of the foreshore on the pyrmont side has residential development.

Instead, it is recommended that only half of the proposed development remains hi rises (if required) on the corner of bank street and pyrmont bridge road where the current fish markets are located as of August 2021.

Instead, the proposed cultural centre and waterside park should be relocated adjacent to bank street (Where buildings 10, 9 and 7 are in your proposal) and a community pool also built here as well (similar to Alfred Park Swimming Pool in Surry Hills but without the design flaws with regards to the wind tunnel that they have created funneling into the pool).

Buildings 10 9 and 7 should be relocated to be in front of buildings 3 & 2 and should be no higher than 8 stories. The Foreshore should subsequently be extended to allow for greater community spaces and a promenade walkway which will no doubt be busy as it wraps around the shoreline to connect to the rest of the city.

Principal 10: Allow for co-existence and evolution of land uses over time.

Unfortunately because the proposed development currently covers most of the foreshore, with no real open land- it does not allow for co-existence and the land cannot be evolved over time as once these buildings are built (high rises) they are somewhat permanent. It is therefore imperative to have open spaces available for the community to enjoy not surrounded by hi rise buildings.

It is also important to note that a morning shadow will cover the promenade and walkways which is an obvious deterrent for people to go for morning walks here to enjoy the sun along this foreshore walkway.

To avoid this and to be mindful of the shadows imparted by tall structures it is important to cluster the buildings together where there will already be shadowing.

Furthermore, having open spaces as depicted in the images below will allow for more community initiatives and gatherings to take place in the park as it will not be surrounded by hi rise buildings.

This can include things like cinema in the park (as they do at Sydney Olympic Park) or even community fairs and events to take place here in the future. It will also be more enticing for

businesses and organizations to hold events at the park which will have sunlight in the mornings and not be overshadowed by a concrete jungle.

There should also be barbeque areas for people to enjoy the water, the sun and the beautiful vibrance of Pyrmont. This park should also be named the ANZAC park/promenade in remembrance of our VETS and could potentially be a future place of importance.

There should also be an indidgenous cultural centre which people can visit. This walkway will be important and it is imperative that community initiatives are recognized and obviously it will be a place for people to thereby visit, both locals and tourists from all of over the world.

It would be an incredible opportunity to put Pyrmont on show to the rest of the world. Tourists can start at the city and walk down along the shore to see various sites and finish up at the fish markets. This will obviously be unenticing if the entire foreshore has apartment buildings shadowing it as per the current development plans.

Principal 11: A place that is inviting, unique in character, socially inclusive and affordable.

Again, the proposed development does not support this principal. It is simply uninviting with the proposed high rises spanning the foreshore and the subsequent shadowing that will occur.

Further, it is not unique as you can see a similar proposal/ layout in the Ryde/ Rhodes area. It would be much better to group the buildings together and not in a line along the foreshore to free up open space which as we all know is inviting and can have multiple purposes.

If a pool is built, people could obviously sunbathe without feeling insecure about on looking eyes from buildings and residents.

With regards to affordability in Sydney, it has never been affordable. It is simply impossible to do such a task without overpopulating and overwhelming the current infrastructure in Pyrmont.

The proposed development may increase supply of dwellings however this should not be at the expense of other things. If anything there would now be an oversupply to keep things affordable which would have obvious implications to the overall build quality which would therefore make it not unique in character or inviting at all. Quality always outweighs quantity.

Social inclusion can only be achieved if more open land and areas are maintained as well as incorporating other initiatives already mentioned.

Principle 12: Expand the range of recreational, community and cultural facilities

Although the current proposal does make some attempt to do this, it is outweighed by the proposal to build numerous hi rises along the foreshore.

It is certainly disappointing that one principle (principle 8) has had such great importance to outweigh every other principle in this plan.

It is clear that there are other motivations at play here and it is disappointing to see the community pay the price in the corporate pursuit for profiteering.

It is quite clear and obvious that these residential and commercial developments proposed are the intended developments of highest importance by the redevelopment committee which obviously does not serve the community as well as open park lands, facilities (cultural centre, community centre, library and pool) and design would.

As a means to compromise and balance commercial & corporate pursuits with community needs & values below we have suggested an alternative.

Either do not build the apartment buildings 10 - 6 or relocate them to be in front of buildings 2-3 to minimize the shadowing and have more space and separation between public and private areas.

Further the foreshore and promenade should be extended onto the bay to create more room for a walk way and facilities.

Principle 13: Plan for the future communityâ€™s education, health, social and cultural needs.

Sadly, this principle has been neglected completely. The proposed development does not have any plan to facilitate the development and improvement of the communityâ€™s education, health, and social needs.

A library should be built to provide the community with this as well as open space to encourage people to play sport in the park, with barbeque facilities as well to address social needs also.

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Unfortunately, this development that is proposed is not socially or culturally viable. The direct impacts to the environment, I would argue are more to the physical and social environment as opposed to the natural/ecological environment. This redevelopment plan is not a viable option.

We implore you to strongly reconsider your proposed redevelopment plans as you will realize it is not in line with the design principles of what should be reflected in the redevelopment proposal. If these design principles were to be neglected totally, which they have been in the current

redevelopment proposal, it is a total failing of the NSW government of whom intended for the redevelopment to be in line with the communityâ€™s vision. Please see the images below for a recommendation for changes to the current redevelopment plan. Please do not hesitate to contact us if you would like to discuss further.

Kindest,

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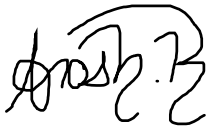

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Pyrmont
Harris Street
Bank Street
Quarry Master Drive
Miller Street
no high rises
10
10
Fourth Arcade
MAX 5 STORIES
Third Arcade
Bank Street
Waterfront Promenade
LIBRARY/ COMMUNITY CENTRE
SWIMMING POOL
16
14
F
F
Blackwattle Bay
EXTEND PARK AREA OUT ONTO WATER FURTHER
L Fish Market
North Entry Plaza
17
3
3
3
2
2
2
2
3
3
Gipps Lane
Bank Lane
Western Distributor
Park Lane
Gipps Street
Park Lane
18
Waterside Park
Pyrmont Bridge Road
Urban Park
Wattle Crescent
15
1
Bridge Road
L

1 New Sydney Fish Market
2 Contemporary Workplace & Retail
3 Contemporary Workplace & Home
4 Retail / Community / Cultural
5 Community / Retail / Workplace
6 Retail / Workplace
7 Mixed Use / PLO-03-2
8 Mixed Use / PLO-03-1
9 Mixed Use / PLO-02
10 Mixed Use / PLO-01
11 Dragon Boat Storage & Launch
12 Community / Creative / Retail
13 Day Charter Marina
14 Corporate Charter Marina
15 Fishing Fleet Wharf
16 Potential Future Marina
17 Exploration Zone
18 Gathering Circle
19 Rowing and Paddling Course
20 Future Connection to Glebe Island
L Light Rail Station
F Potential Ferry Stop
Waterfront Park
Pyrmont
Harris Street
Union Square
Bank Street
Miller Street
Fish Market
North Entry Plaza
Promenade
Blackwattle Bay
Gipps Lane
Bank Lane
Park Street
Gipps Street
Park Lane
Western Distributor
Waterside Park
Pyrmont Bridge Road
Urban Park
Wattle Crescent
Wentworth Park

183006

Kerr

Sydney

Please see attached submission.

Tzannes GYDE

Submission on behalf of PBR Nominees Pty Ltd on the proposed Blackwattle Bay Redevelopment

46-48 Pyrmont Bridge Road, Pyrmont

Prepared on
August 2021

This submission is primarily concerned with the evolution of Blackwattle Bay and the impacts of the current proposal on the amenity and role of Pyrmont Bridge Road. The submission reflects on the Blackwattle Bay proposal and presents the case to establish Pyrmont Bridge Road as a distinct sub-precinct with new development controls within the Pyrmont peninsula between the Blackwattle Bay and Darling Harbour precincts. This submission has been developed from a study of the redevelopment potential of 46-48 Pyrmont Bridge Road, Pyrmont for PBR Nominees Pty Ltd.

Project Team

Project Team

Client	PBR Nominees Pty Ltd John Leece
Urban Design and Architecture	Tzannes: Alec Tzannes Kevin Mak
Planning	GYDE Stephen Kerr Jonathan Tolentino

Document Control

REVISION	REASON FOR REVISION	DATE
1.	Issue for Submission	20.08.21

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   - 3.1 General Overview and Support
4. Current Development Controls
   - 4.1 LEP and DCP controls and Implications of Future Character
5. Future Role of Pyrmont Bridge Road and Buildings
   - 5.1 Urban Analysis
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   - 6.1 Site
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Introduction

01

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1. Introduction

1.1 Disclosure of Property Interest and Purpose of Submission

We are pleased to make this submission on behalf of PBR Nominees Pty Ltd who are the owners of 46-48 Pyrmont Bridge Road, Pyrmont (the site).

Our client's site is located approximately 90 metres from the Blackwattle Bay Precinct, separated only by the Western Distributor. Importantly, it is located on what will become the major pedestrian spine connecting the Blackwattle Bay Precinct with the Pyrmont Sydney Metro Station.

The purpose of this submission is to offer our client's broad support for the Blackwattle Bay State Significant Precinct (SSP) Study, while acknowledging that there is an appropriate balance yet to be struck between the quantum and quality of foreshore public open space, and the development required to achieve the objectives of the Pyrmont Place Strategy.

In this submission, we have also considered how sites should appropriately respond to the transformation of the Blackwattle Bay Precinct within the context of the Pyrmont Bridge Road spine and the contribution it too can make to realising the objectives of the Pyrmont Place Strategy.

Source: Mark Merton Photography

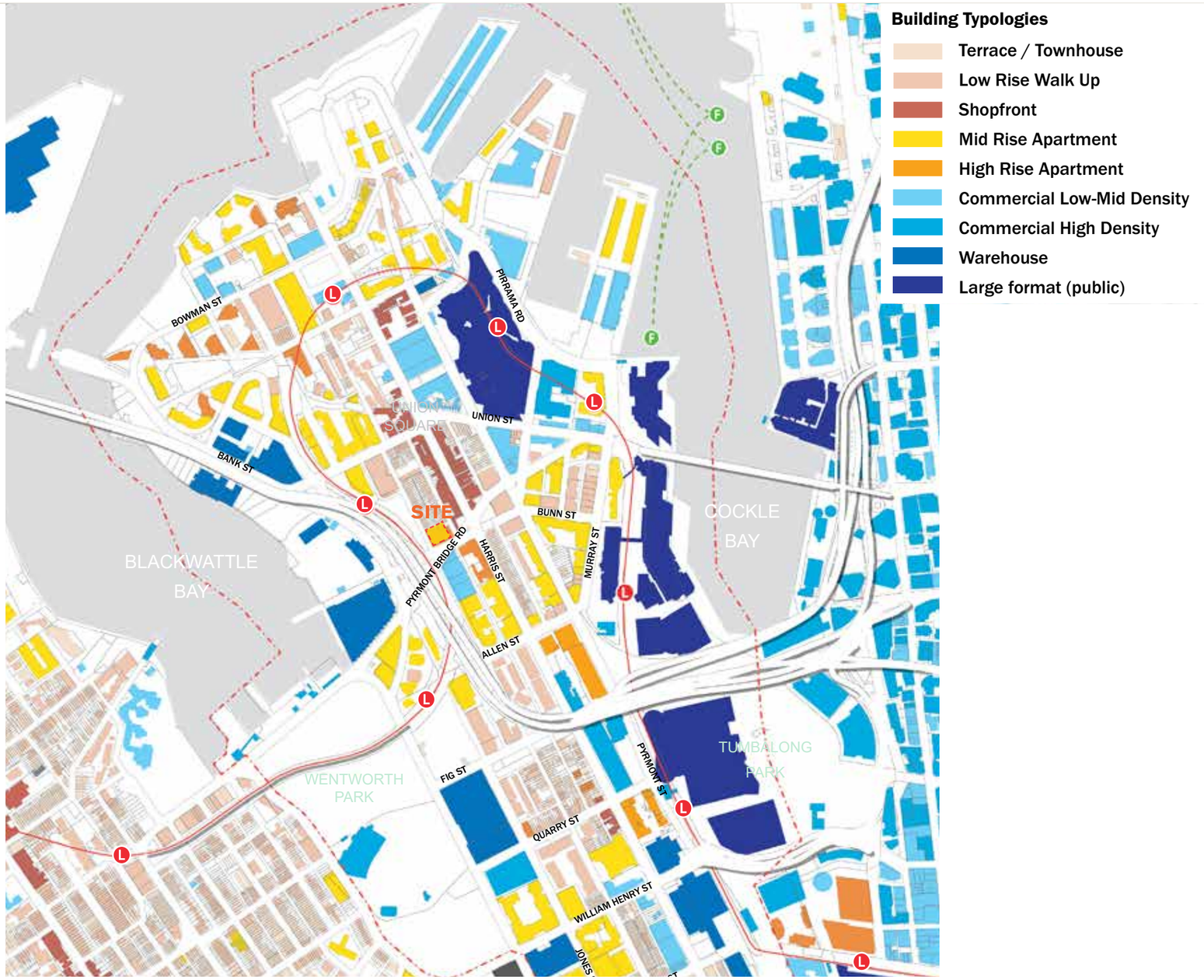
Pyrmont Place Strategy

02

2. Pyrmont Place Strategy

2.1 Establish Strategic Context

The Pyrmont Peninsula Place Strategy (the Place Strategy) establishes a broad planning framework for the Pyrmont Peninsula which envisages an increase of up to 23,000 jobs and a greater supply of commercial buildings providing as much as 800,000m2 of additional floorspace that would house an industry mix geared towards the knowledge industries.



Source: Pyrmont Peninsula Place Strategy

2. Pyrmont Place Strategy

2.1 Establish Strategic Context

The vision for the Pyrmont Peninsula is that "In 2041, the Pyrmont Peninsula will be an innovative, creative and cultural precinct and an engine room of the Eastern Harbour CBD. It will connect to the Innovation Corridor and other innovation and job precincts via Sydney Metro and complement the Sydney CBD."

Source: Pyrmont Peninsula Place Strategy

2. Pyrmont Place Strategy

2.2 Urban Design Framework Objectives

The Place Strategy identifies five 'Big Moves' that will unlock the opportunities to bring the vision for the Peninsula to life. They are:

1. A world-class harbour foreshore walk
2. A vibrant 24-hour cultural and entertainment destination
3. Connect to Metro
4. Low carbon, high performance precinct
5. More, and better activated public space

Source: Pyrmont Peninsula Place Strategy

2. Pyrmont Place Strategy

2.2 Urban Design Framework Objectives

The Place Strategy identifies five sub-precincts within the Peninsula. Our client's site sits on the boundary of two of those sub-precincts: Blackwattle Bay "A place of transformation and renewal"; and Pyrmont Village "A place of history, innovation and culture".

Source: Pyrmont Peninsula Place Strategy

Blackwattle Bay Planning Proposal

03

3. Blackwattle Bay Planning Proposal

3.1 General Overview and Support

The Place Strategy recognised that Blackwattle Bay offers the greatest potential for change across the Peninsula. We commend Infrastructure NSW on the vision and scope of the Blackwattle Bay SSP Study which delivers approximately 5,600 new jobs and 1,550 new dwellings in a location that is in urgent need of renewal. As we alluded to earlier, there is potentially an imbalance involving the quantum and quality of foreshore public open space and we would support further emphasis being given to ensuring the vital role of the foreshore public open space is not diminished by the inappropriate encroachment of buildings and the shadows they cast.

Nevertheless, even with this rebalancing, the scale and scope of development and renewed activity in the Blackwattle Bay Precinct will be transformative..

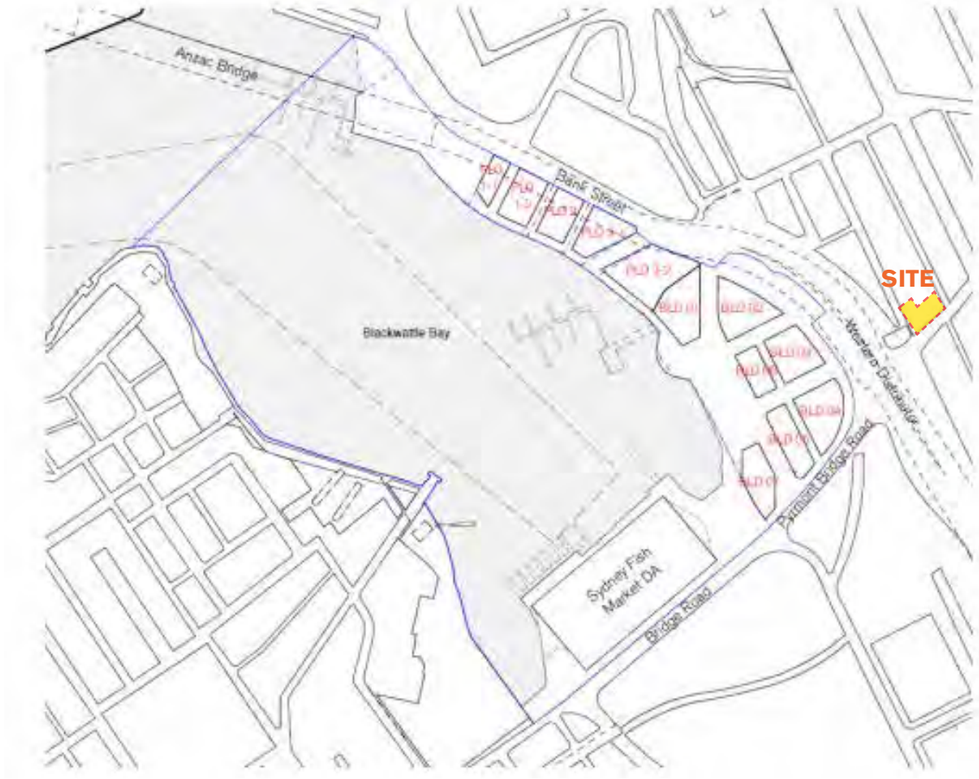
Source: Infrastructure NSW, Guide to Blackwattle Bay SSP

3. Blackwattle Bay Planning Proposal

3.1 General Overview and Support

The transformation of places like Blackwattle Bay, well served by infrastructure and proximate to the Sydney CBD, is essential to managing Sydney's inevitable future growth and reducing urban sprawl. As the development of Central Park has shown, density can be achieved so long as there is an appropriate balance of public amenity. What's more, density can be achieved alongside traditional neighbourhoods without diminishing the quality of those neighbourhoods.

The SSP proposes to create 12 development blocks within the Blackwattle Bay Precinct. Nearest to our client's site, the development blocks are proposed to accommodate mixed use buildings up to 156 metres in height. The proposed scale of development relative to the Pyrmont Bridge Road spine and our client's site is illustrated later.



Source: Blackwattle Bay SSP

Source: Tzannes

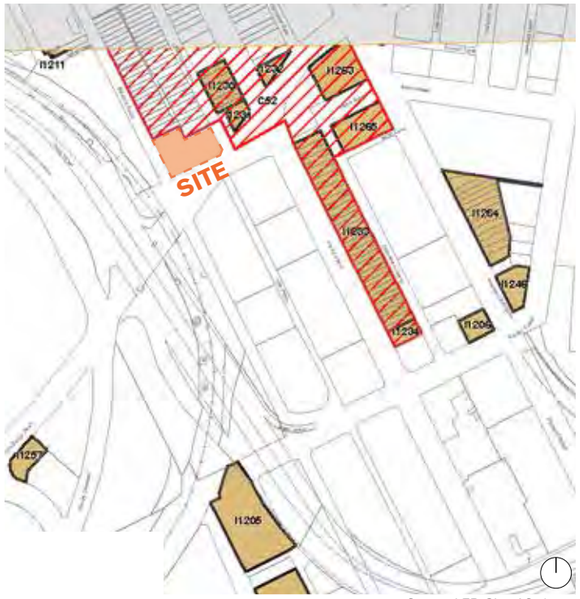
Current Development Controls

04

4. Current Development Controls

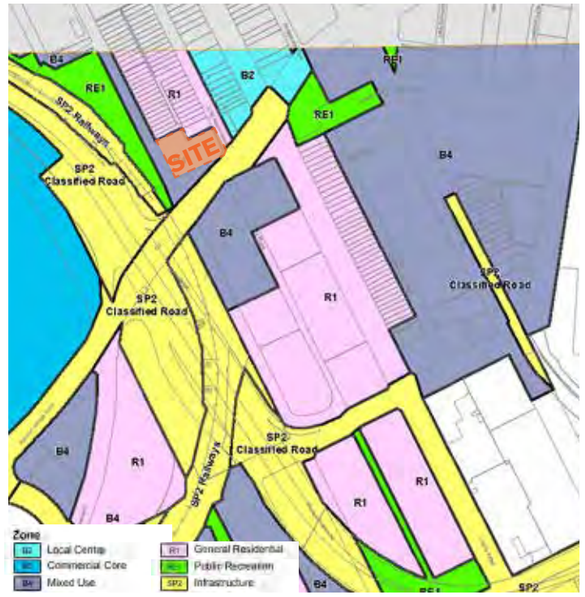
4.1 LEP and DCP Controls and Implications of Future Character

The Sydney Local Environmental Plan 2012 (LEP) prescribes the current zoning, height and density (FSR) controls. Under the LEP, the building heights in the Blackwattle Bay Precinct currently from 12 to 33 metres and there is a variety of land use zones. Our client's site is currently zoned B4 Mixed Use, with a maximum height of 12 metres.



Source: LEP, City of Sydney.

LEP Heritage Map | Conservation Area - General

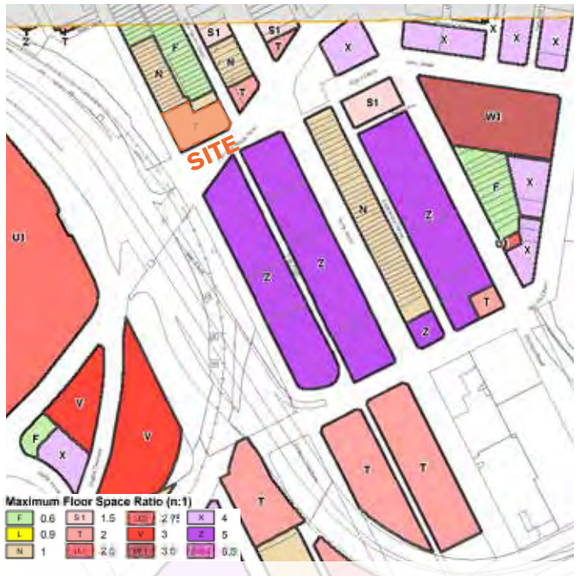


Source: LEP, City of Sydney.

LEP Land Zoning Map | B4 - Mixed Use

Source: LEP, City of Sydney.

LEP Height of Buildings Map | M - 12m (Maximum)



Source: LEP, City of Sydney.

LEP Floor Space Ratio Map | T - 2:1 (Maximum)

4. Current Development Controls

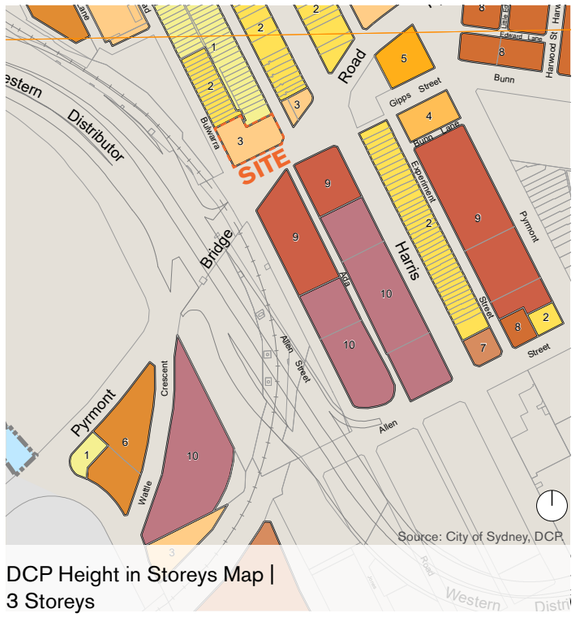
4.1 LEP and DCP Controls and Implications of Future Character

Additional planning guidelines are provided in the Sydney Development Control Plan 2012 (DCP).

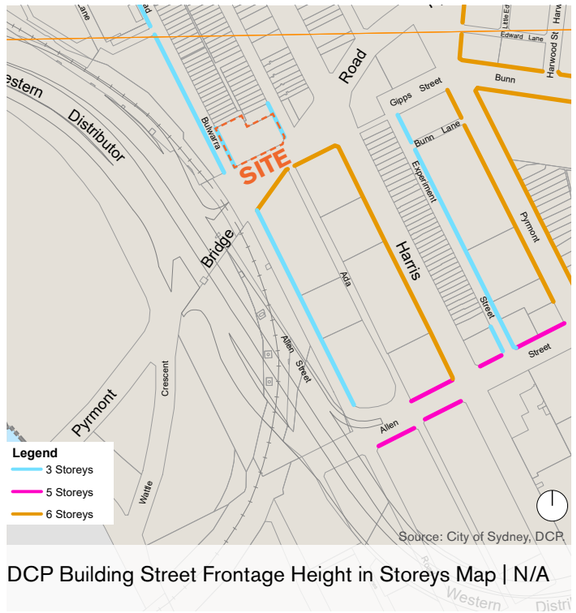
Among other things, it identifies the desired future character of the 'Pyrmont Locality', albeit before the Pyrmont Metro Station was conceived, as follows:

- heritage items and contributory buildings within the Pyrmont heritage conservation area, including lanes and streetscapes,
- the maintenance of views and vistas from the public domain to the harbour, CBD, and surrounding areas,
- the amenity of the public domain with awnings and buildings which address the street,
- retainment of low scale housing and large-scale industrial buildings,
- compatible materials including sandstone and brick,
- café and restaurant street dining where footpath widths permit, and
- the adaptive re-use of historical buildings providing a mix of land uses with distinctive built forms.

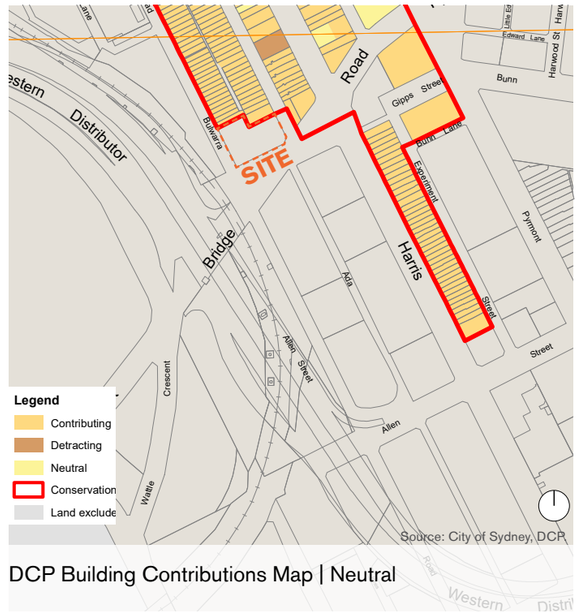
The locality statement requires new development to improve the public domain with buildings which address the street and do not inhibit views from the public domain to surrounding areas. Importantly, new development is to provide active uses to the street such as cafes and restaurant dining which improve the quality of the pedestrian experience.



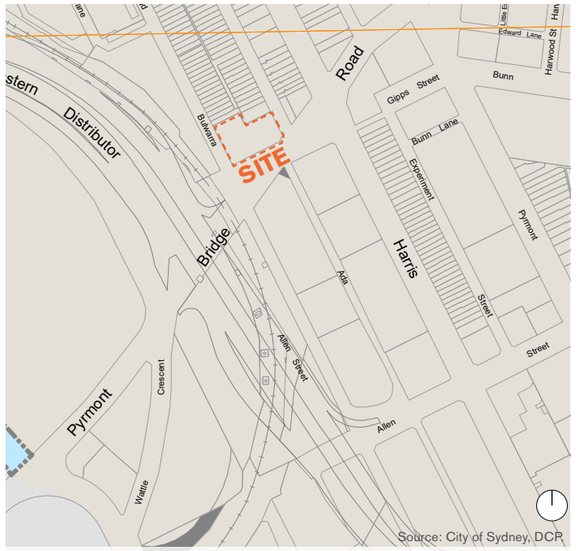
DCP Height in Storeys Map | 3 Storeys



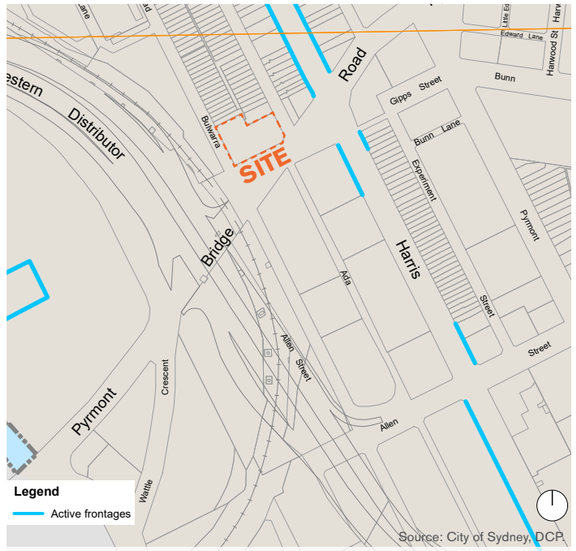
DCP Building Street Frontage Height in Storeys Map | N/A



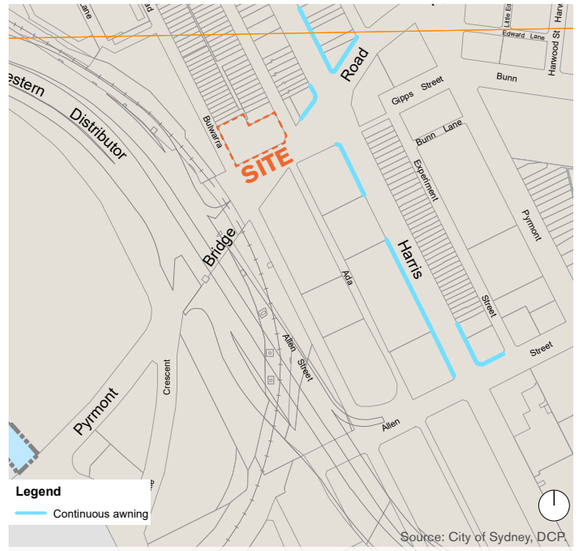
DCP Building Contributions Map | Neutral



DCP Building Setback and Alignment Map | N/A



DCP Active Frontages Map | N/A



DCP Footpath Awnings and Colonnades Map | N/A

Future Role of Pyrmont Bridge Road

05

5. Future Role of Pyrmont Bridge Road

5.1 Urban Analysis

5.1.1 Pyrmont Bridge Road from Blackwattle Bay to Pyrmont Bridge

The Pyrmont penisula is located between two city-scale precincts of distinct urban character, Blackwattle Bay and Darling Harbour. The area is undergoing significant transformation in density, scale and urban amenity in the public domain.

5. Future Role of Pyrmont Bridge Road

5.1 Urban Analysis

5.1.1 Pyrmont Bridge Road from Blackwattle Bay to Pyrmont Bridge

At the middle of the Pyrmont penisula between the two key precincts is a heritage conservsation sub-precinct which is bordered by the Western Distributor and larger scale urban blocks to the east. Pyrmont Bridge Road acts as the primary connector between and thorough these important and unique precincts.

5. Future Role of Pyrmont Bridge Road

5.1 Urban Analysis

5.1.2 Pedestrian Movement

The primary pedestrian arteries in Pyrmont follow the waters edge as an extension of the Sydney Harbour Foreshore walk as well as the main north south connector of Harris Street.
A pedestrian friendly east-west connecting street is found along Union and Miller Street. However this connection terminates at Anzac Bridge. Due to the height of topography it does not truely complete an east to west connection across the Pyrmont penisula. Pyrmont Bridge Road completes the connection primarily for vehicles with lower levels of pedestrian and bicycle amenity.

5. Future Role of Pyrmont Bridge Road

5.1 Urban Analysis

5.1.3 Public Transport

With the introduction of the future Pyrmont Metro station the importance of the east west connection formed by Pyrmont Bridge Road will be reinforced and significant urban improvements along this street will benefit the public transport network greatly.

5. Future Role of Pyrmont Bridge Road

5.1 Urban Analysis

5.1.4 Vehicular Movement

Currently Pyrmont Bridge Road prioritises vehicular access, sending traffic west to Glebe or the Anzac Bridge and east towards the waters edge or south to connect to either the motorway or Ultimo. With the additon of the Metro station the priority of vehicles over pedestrians requires review to consider new planning and urban design initiatives.

5. Future Role of Pyrmont Bridge Road

5.1 Urban Analysis

5.1.5 Bicycle Movement

Pyrmont has two primary tiers of cycle routes. One focuses on the experience of the waters edge while the other connects the Sydney CBD to the Anzac Bridge. The foreshore is a dedicated pedestrian and cyclist shareway while the east west connection to the bridge is along dedicated cycle paths.

The remaining cyclist amenity along primary streets are less defined and safe. Cyclist share lanes with other vehicles moving between large scale infrastructure.

Future renewal of the precinct must focus on improving connections between precincts for cyclists, not having to compete with large volumes of traffic.

5. Future Role of Pyrmont Bridge Road

5.1 Urban Analysis

5.1.6 Open Space Amenity

Pyrmont is one of the Sydney city regions that has a diverse range of both public and communal open space with close access to the waters edge. The future of Pyrmont Bridge Road should be to connect some key open spaces.

From west to east a future green spine can be established between, Wentworth Park, the new fishmarkets, Paradise Reserve, Elizabeth Healey Reserve and Pyrmont Bridge leading to new public parks at Cockle Bay and the likey redevelopment of the Aquarium with improved open space amenity.

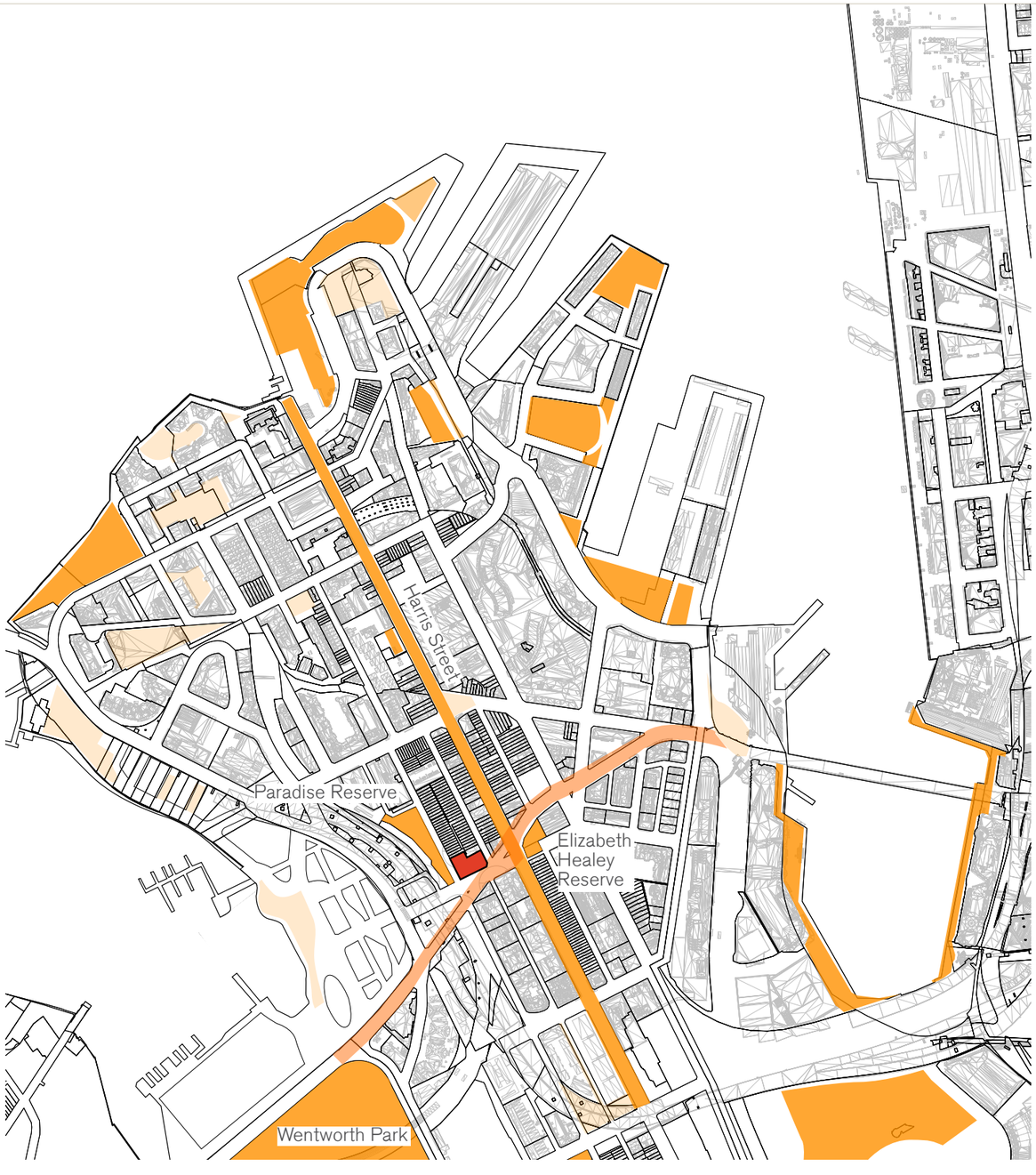
5. Future Role of Pyrmont Bridge Road

5.1 Urban Analysis

5.1.7 Solar Protection to Sensitive Sites

Solar protection to those key open spaces is vital for the future public amenity of the precinct. Pyrmont Bridge Road has very few adjacent areas of protection to it's south.

Wentworth Park, Harris Street, Elizabeth Healey Reserve and Paradise Reserve are the few areas that require solar access plane protection from potential development uplift along the road.



5. Future Role of Pyrmont Bridge Road

5.1 Urban Analysis

5.1.8 Adjacent Sub-Precincts

The Pyrmont Penisula Precinct Strategy highlights distinct sub-precincts within the larger context. These precincts reflect the different character and program of each distinct area but are clearly divided and separated from each other.

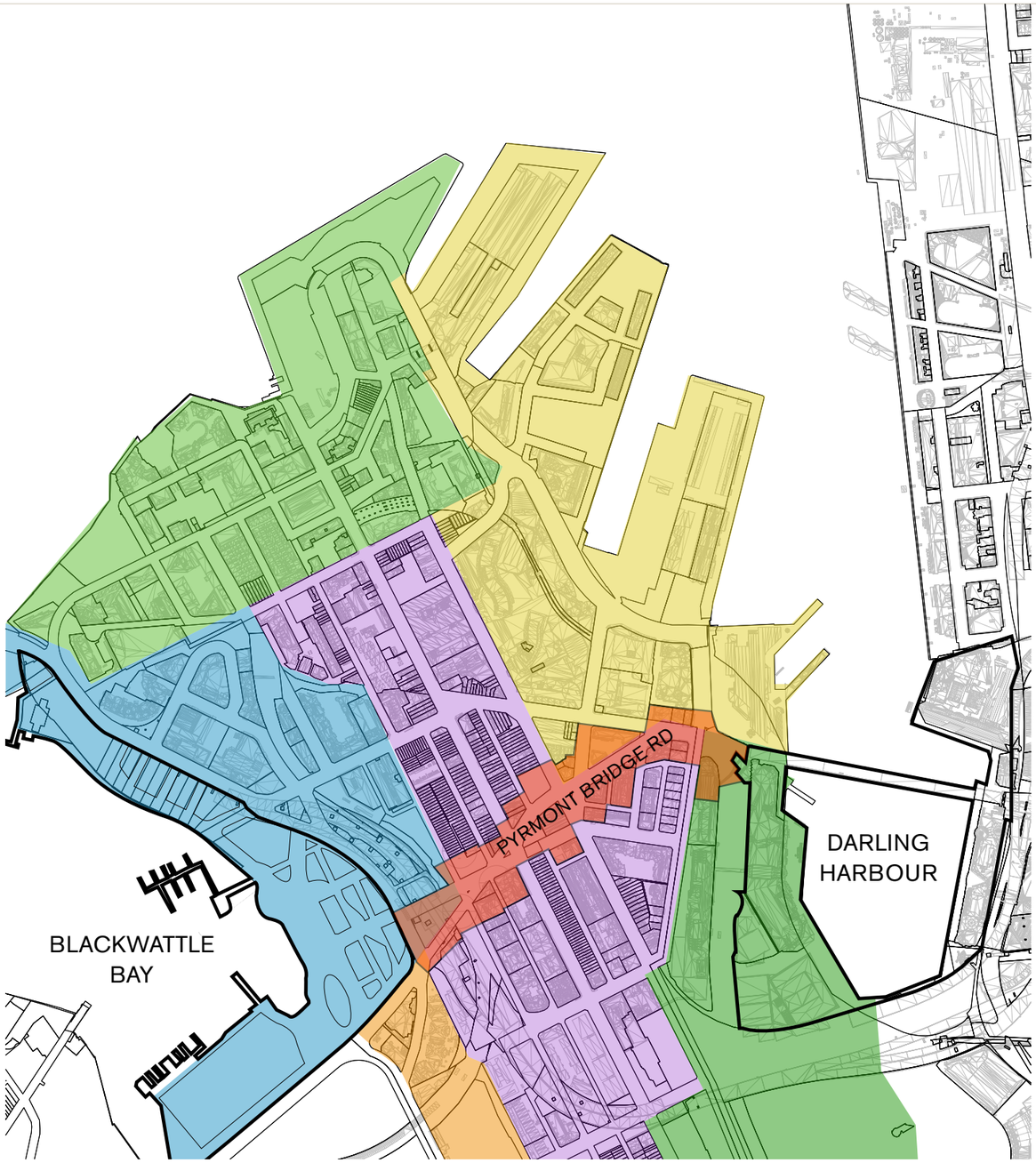
5. Future Role of Pyrmont Bridge Road

5.1 Urban Analysis

5.1.9 Pyrmont Bridge Road Sub-Precinct

The urban anaylsis helps define an additional sub-precinct of Pyrmont Bridge Road will greatly benefit the interface and connectivity between the different precincts within the penisula.

Pyrmont Bridge Road can form a distinct sub-precinct within the Pyrmont peninsula defined by the urban role connecting two major public areas, the subdivision pattern, scale and type of buildings and topography. It is bounded north and south by distinctive predominantly residential neighborhoods with conservation status which will benefit from the urban design improvements of Pyrmont Bridge Road.



Case Study: 46-48 Pyrmont Bridge Road

06

6. Case Study: 46-48 Pyrmont Bridge Road

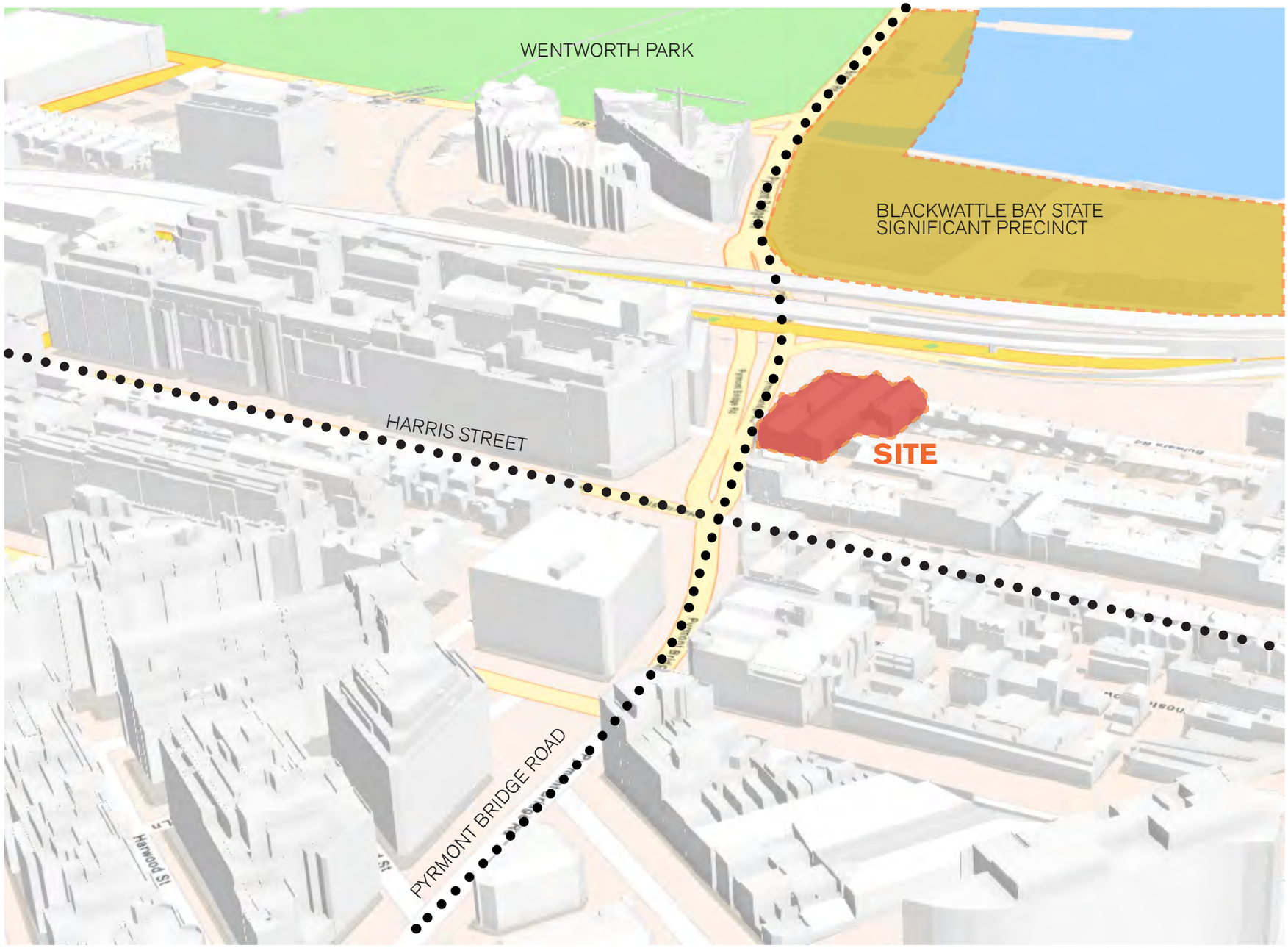
6.1 Site

6.1.1 Site Overview

The site is located on the corner of Pyrmont Bridge Road and the Western Distributor. The surrounding context reflects the scale and character of Pyrmont's industrial history and it's more recent transformation to a mix of programs and urban typologies. The fine grain residential terraces located to the north form a precinct with a distinct lower density.

The site represents an opportunity to demonstrate a more appropriate character and level of amenity reflecting the role of Pyrmont Bridge Road in the broader urban context as it evolves with the changes proposed at Blackwattle Bay.

This case study focuses on determining a proposed built envelope for the site, while maintaining an appropriate distinction to the hertiage conservation area. The study will also address the impact on solar protection of surrounding green public spaces, identifed in the previous sections and future desired character of Pyrmont Bridge Road.



Base Map Source: Pyrmont Peninsula Place Strategy

6. Case Study: 46-48 Pyrmont Bridge Road

6.1 Site

6.1.2 Site Description

Location

The site is bordered by Bulwara Road and Paradise Reserve to the west, Pyrmont Bridge Road to the south, Little Mount Street to the east, 82 Bulwara Road and 63 Little Mount Street to the north.

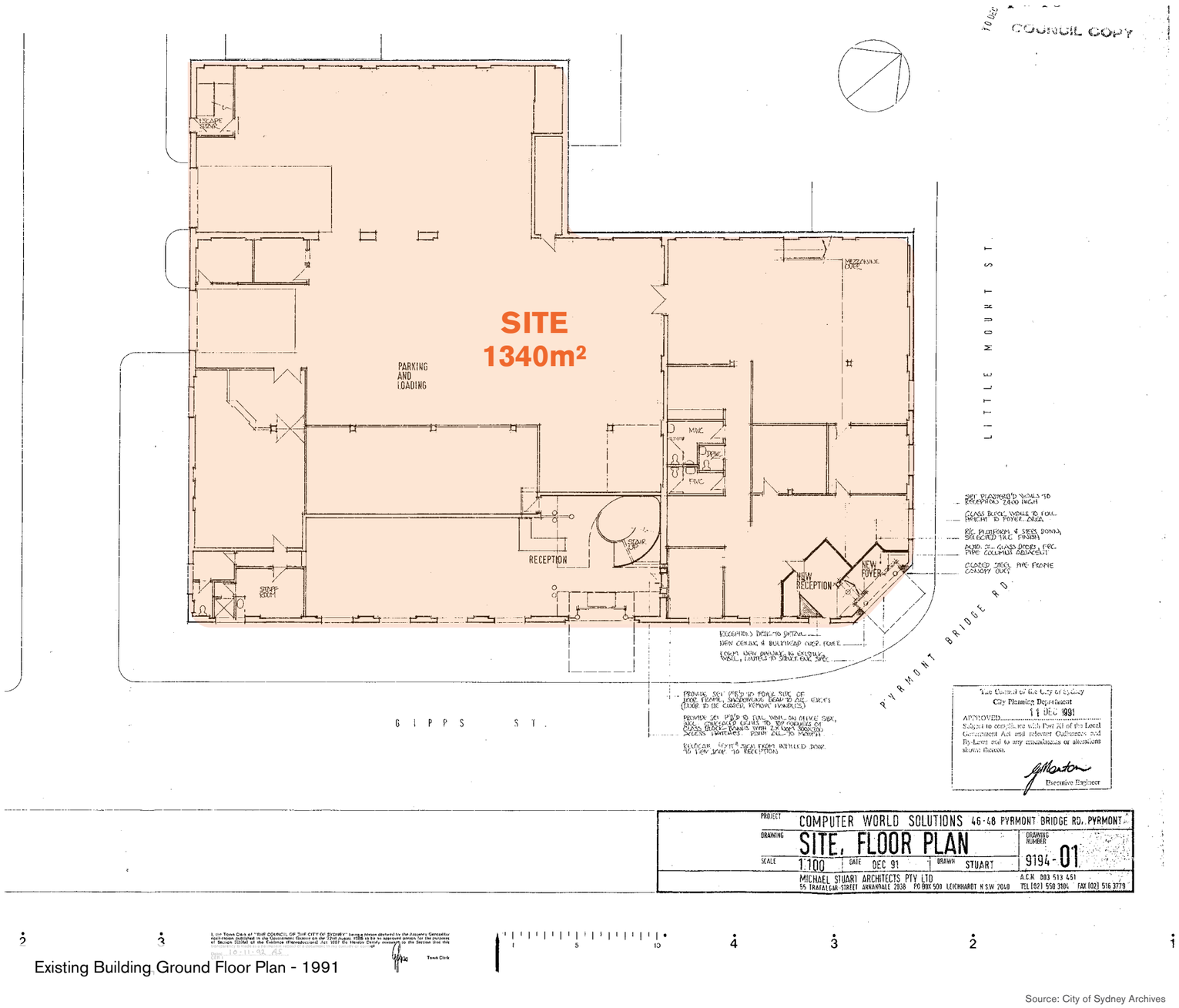
Legal Description

Lot 1 in DP800148
46-48 Pyrmont Bridge Road, Pyrmont

Site Area

1340m²

(approximate site area is based on geodata avaliable by NSW Spatial Services on Six Maps.)



Existing Building Ground Floor Plan - 1991

Source: City of Sydney Archives

6. Case Study: 46-48 Pyrmont Bridge Road

6.2 Soar Protection

6.2.1 Solar Protection Diagram

Solar Protection

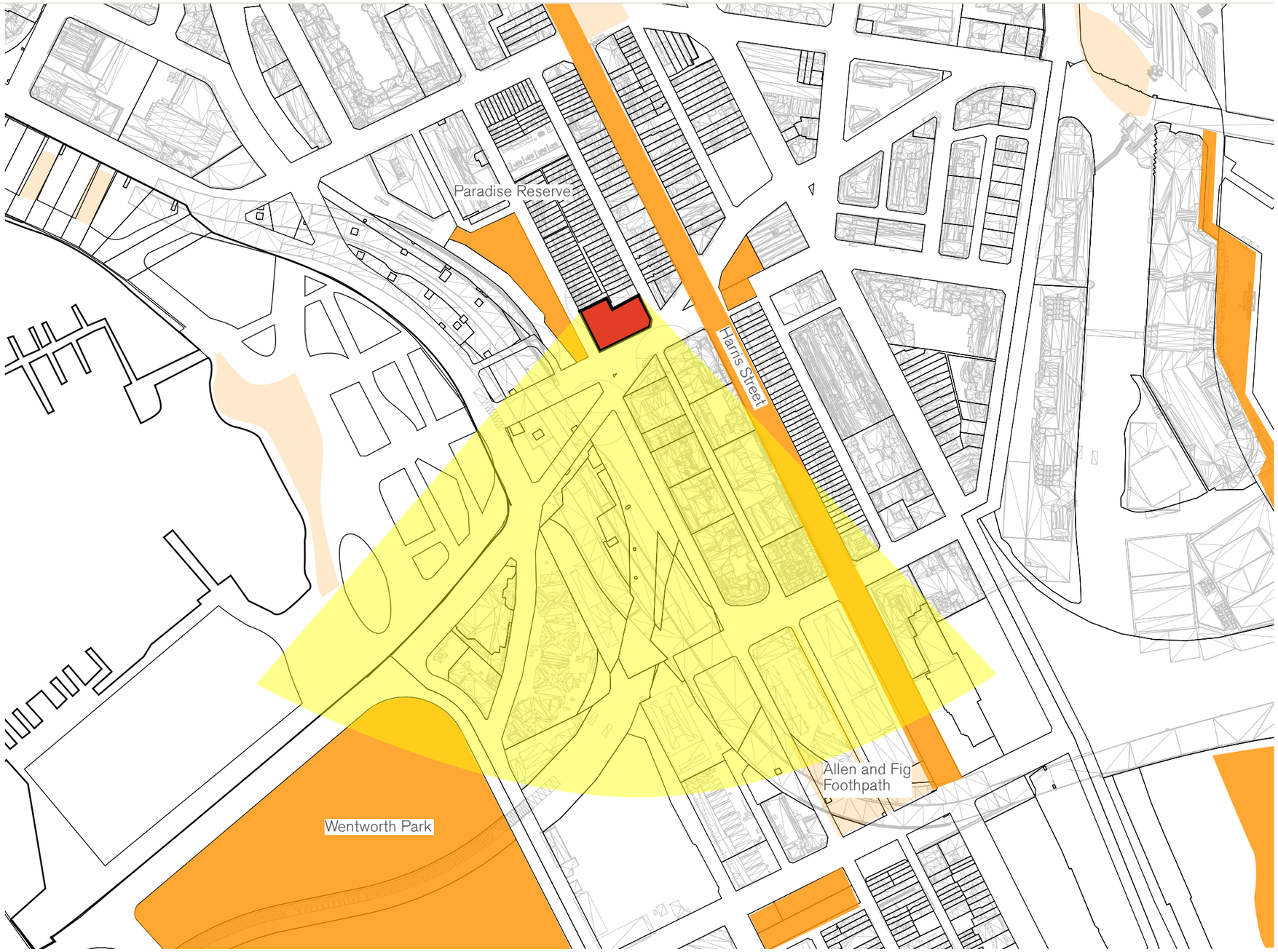
The solar protection envelope is generated by a combination of protection criteria from the PPPS and the City of Sydney DCP 2012

Assumed control:
City of Sydney Development Control Plan 2012
Section 3.1.4 Public Open Space:

Provision 3(a) - in relation to parks, 50% of the total area is to receive sunlight for 4 hours from 9am to 3pm on 21 June.

Areas being protected for solar access.

- A portion of Paradise Park between 10am - 2pm (required from LEP/PPPS)
- Wentworth Park between 10am - 2pm (required from LEP/PPPS)
- Harris Street between 12pm - 2pm (required from LEP/PPPS)
- Footpath between Allen St and Fig St between 9am - 3pm (from LEP)



6. Case Study: 46-48 Pyrmont Bridge Road

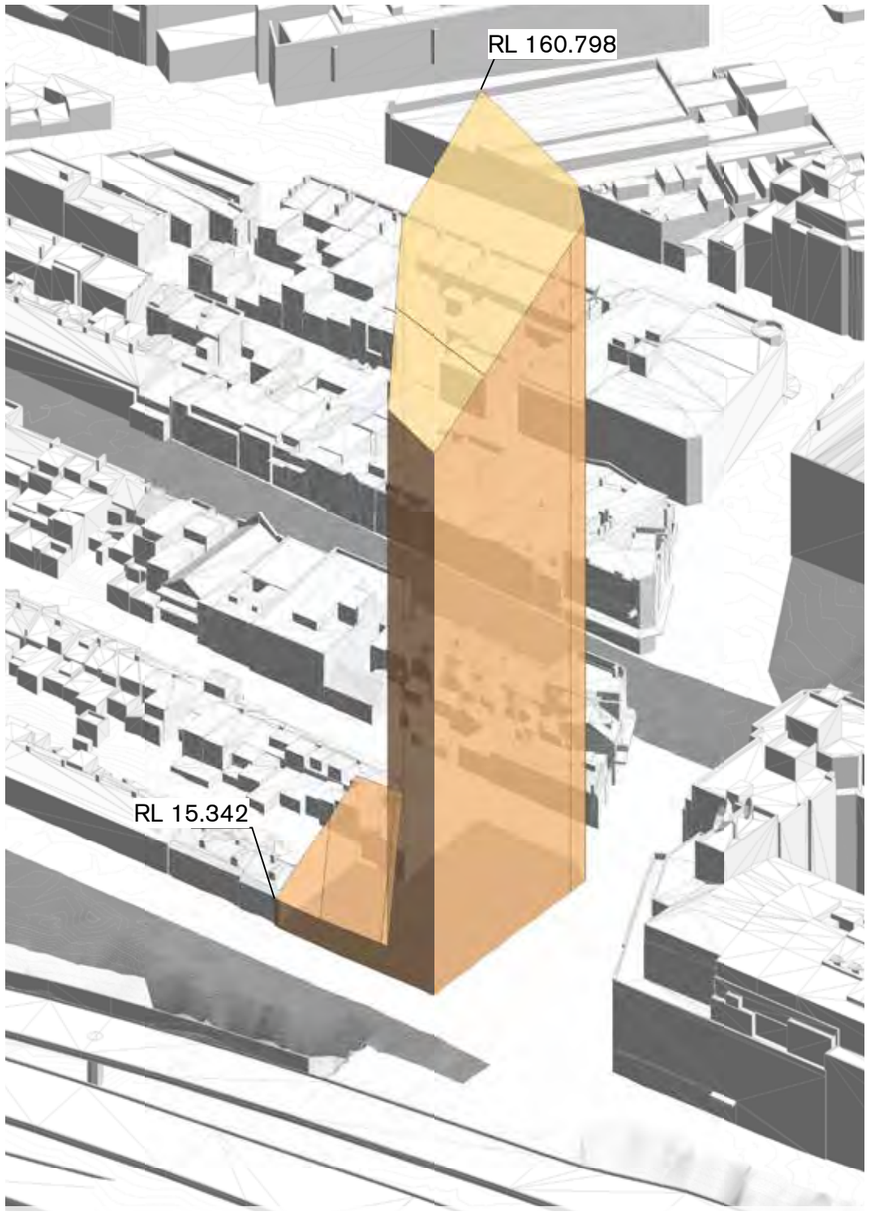
6.2 Solar Protection

6.2.2 Reverse Solar Envelope

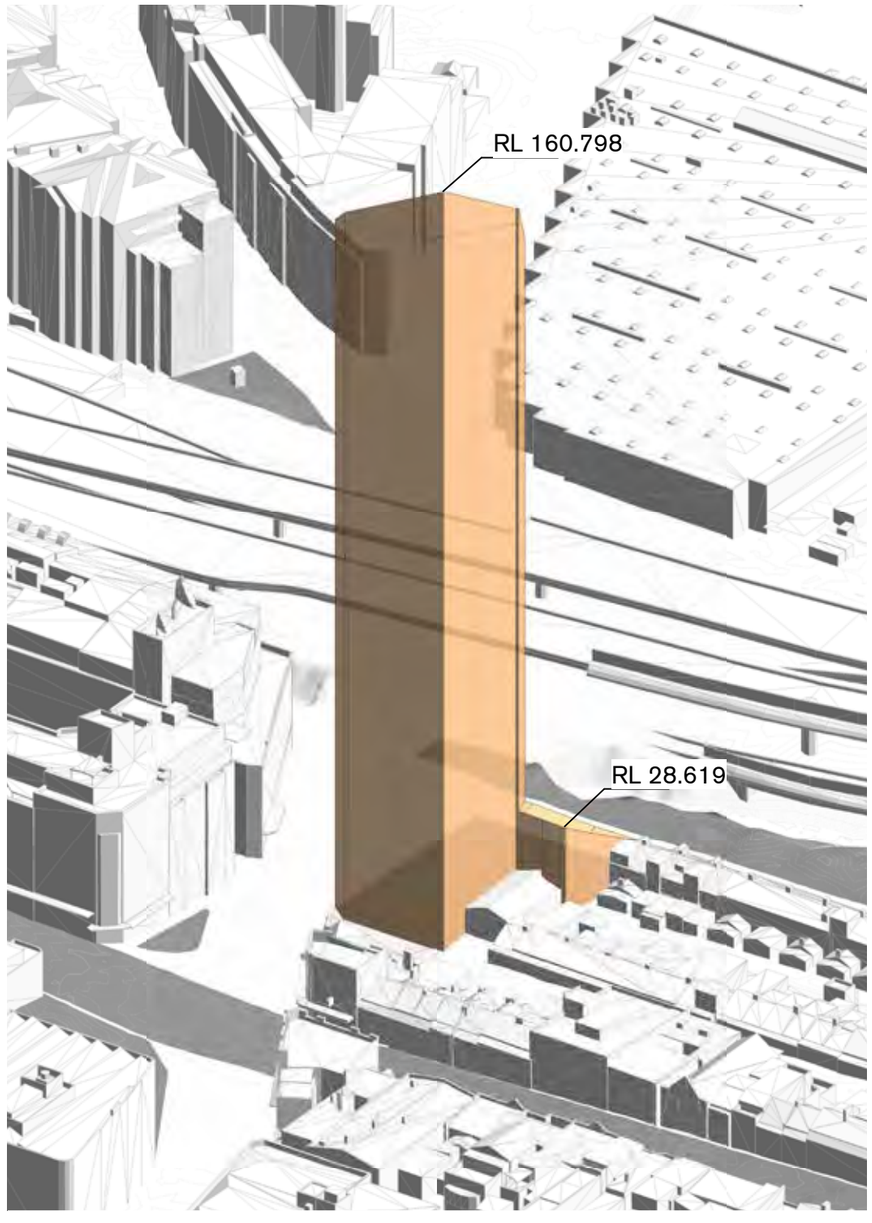
Solar Protection

The reverse solar envelope is the result of the amalgamated solar protection planes required to protect public spaces. These planes are created by View from the Sun studies set to the 21st June which can be found in the Appendix.

This study establishes that the envelope has no solar impact on the nominated public open space protection areas, as defined by relevant planning principles, controls and guidelines from the PPPS and CoS.



Reverse Solar Envelope - View From SW



Reverse Solar Envelope - View From NE

6. Case Study: 46-48 Pyrmont Bridge Road

6.3 Response to Urban Conditions

6.3.1 Conceptual Built Form Massing

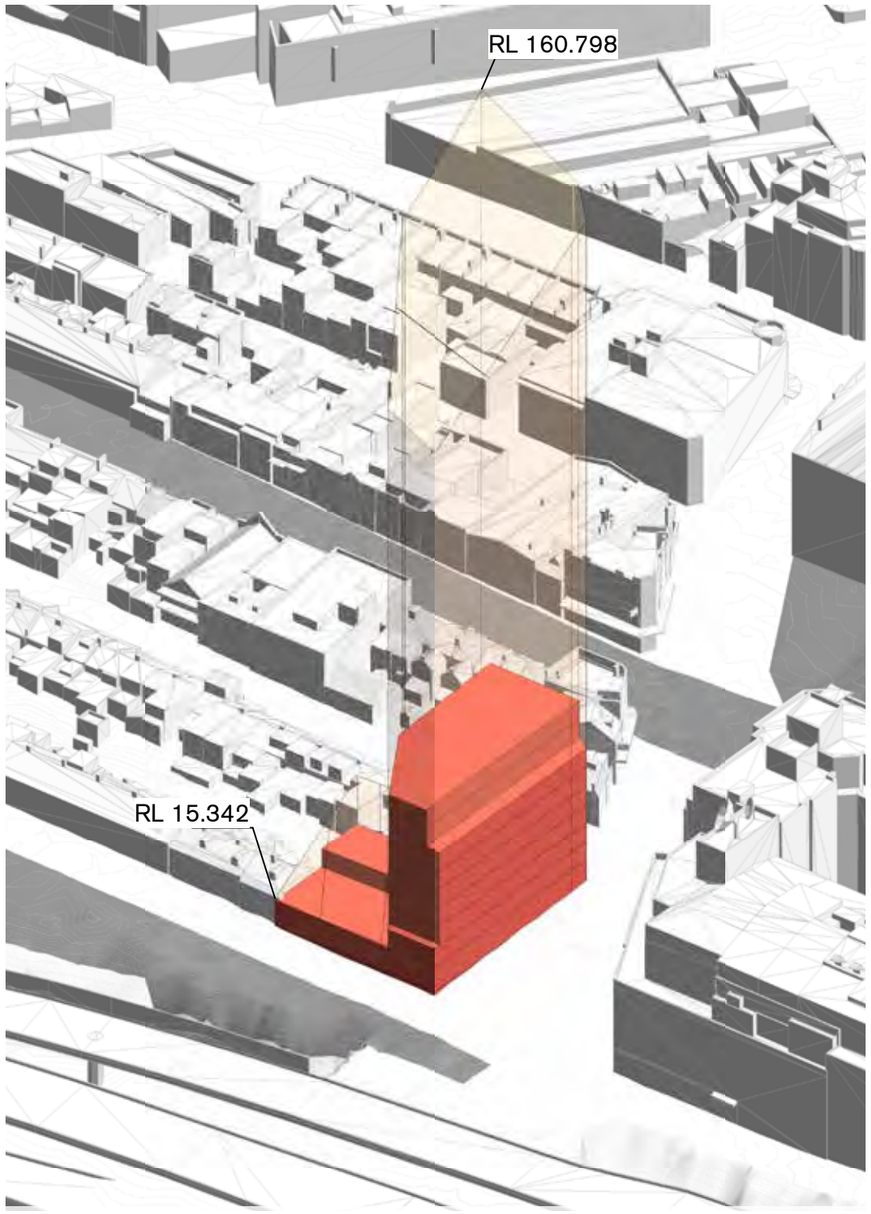
Conceptual Built Form Massing

The resulting reverse solar envelope is a built form massing that has been created to show the potential for the site beyond the current development controls.

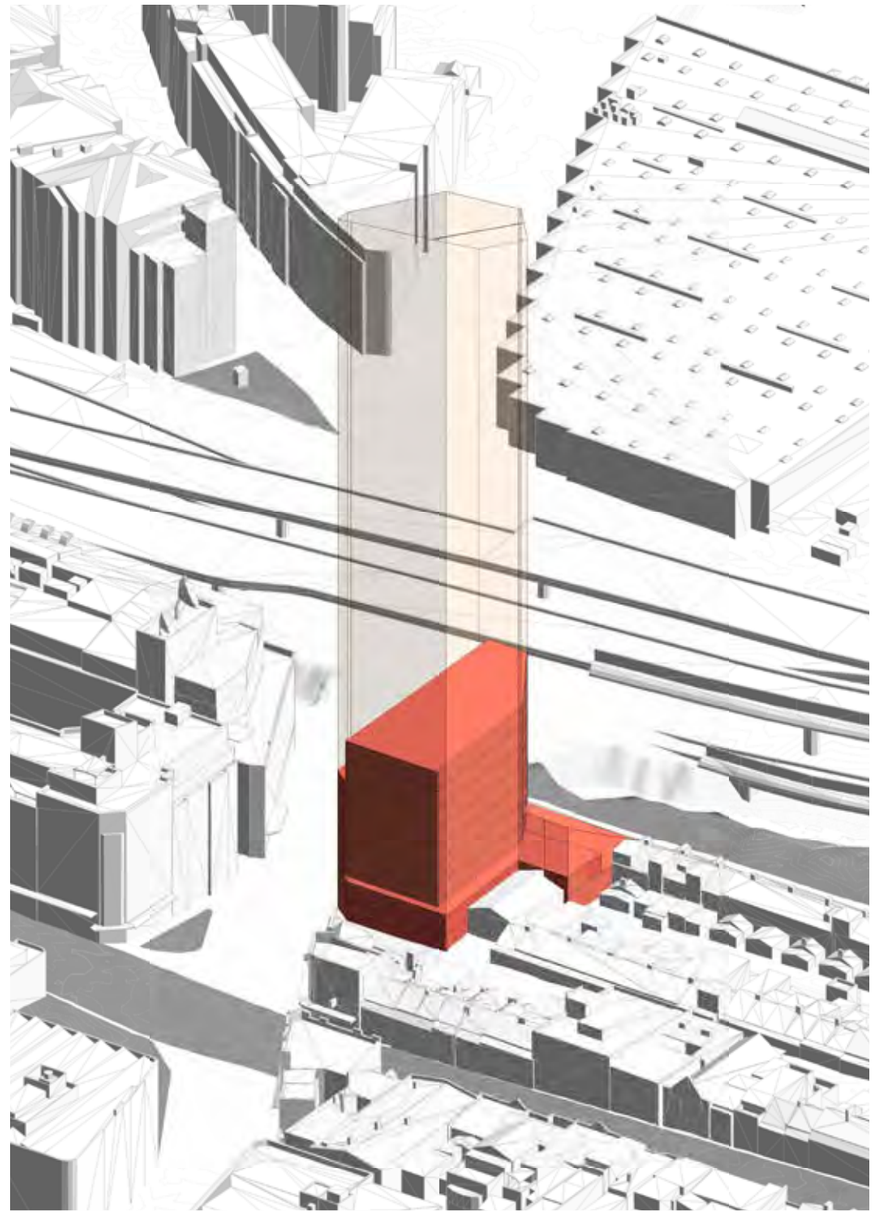
The form respects the conservation area to the north by a 3m setback at 3.storeys. To the east a 1.5m setback is also maintained at 3 storeys similar in height to the building that shares the corner.

As the form goes up in height a further 3m setback at southern boundary aims to create a street wall with similar conditions to the commercial and residential buildings on the other side of the road.

The building is 9 storeys tall similar to the adjacent taller buildings along Pyrmont Bridge Road.



Reverse Solar Envelope Comparison - View From SW



Reverse Solar Comparison - View From NE

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Pyrmont Bridge Road Sub-Precinct Proposal

07

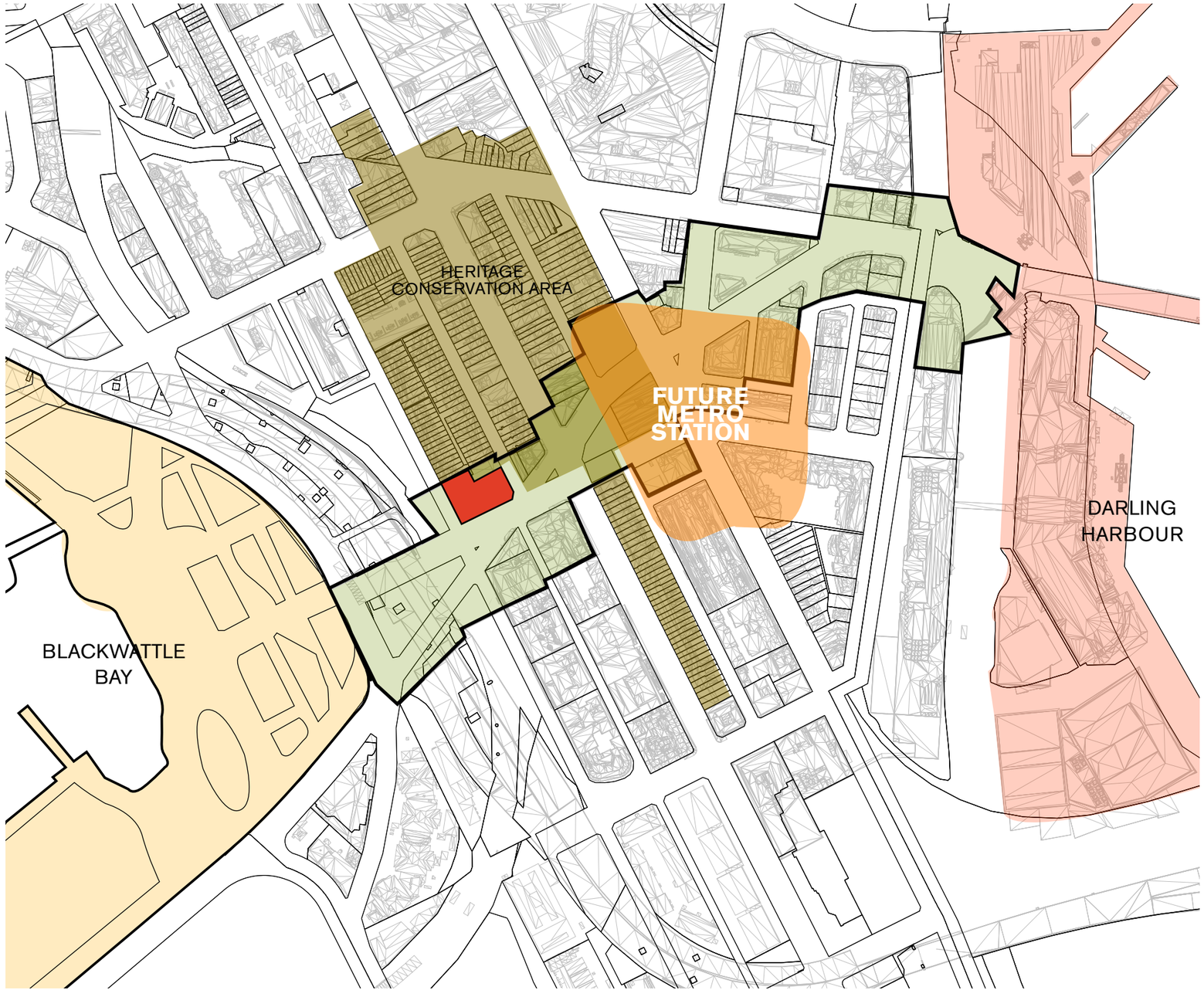
7. Pyrmont Bridge Road Sub-Precinct Proposal

7.1 Civic and Urban Significance

The state significant development of Blackwattle Bay signals the city's desire for a greater and more connected civic and public realm. The benefits of which need to be carefully balanced with the infrastructure and investment potential in the key sites that surround and support our city.

The future renewal projects in the Pyrmont area will dramatically increases the benefits of the social, economic and infrastructure goals outlined as five big moves in the Pyrmont Place Strategy 2020.

This prosposal highlights the importance of considering Pyrmont Bridge Road as a distinct sub-precinct within the greater Pyrmont Penisula.



7. Pyrmont Bridge Road Sub-Precinct Proposal

7.2 Desired Future Character

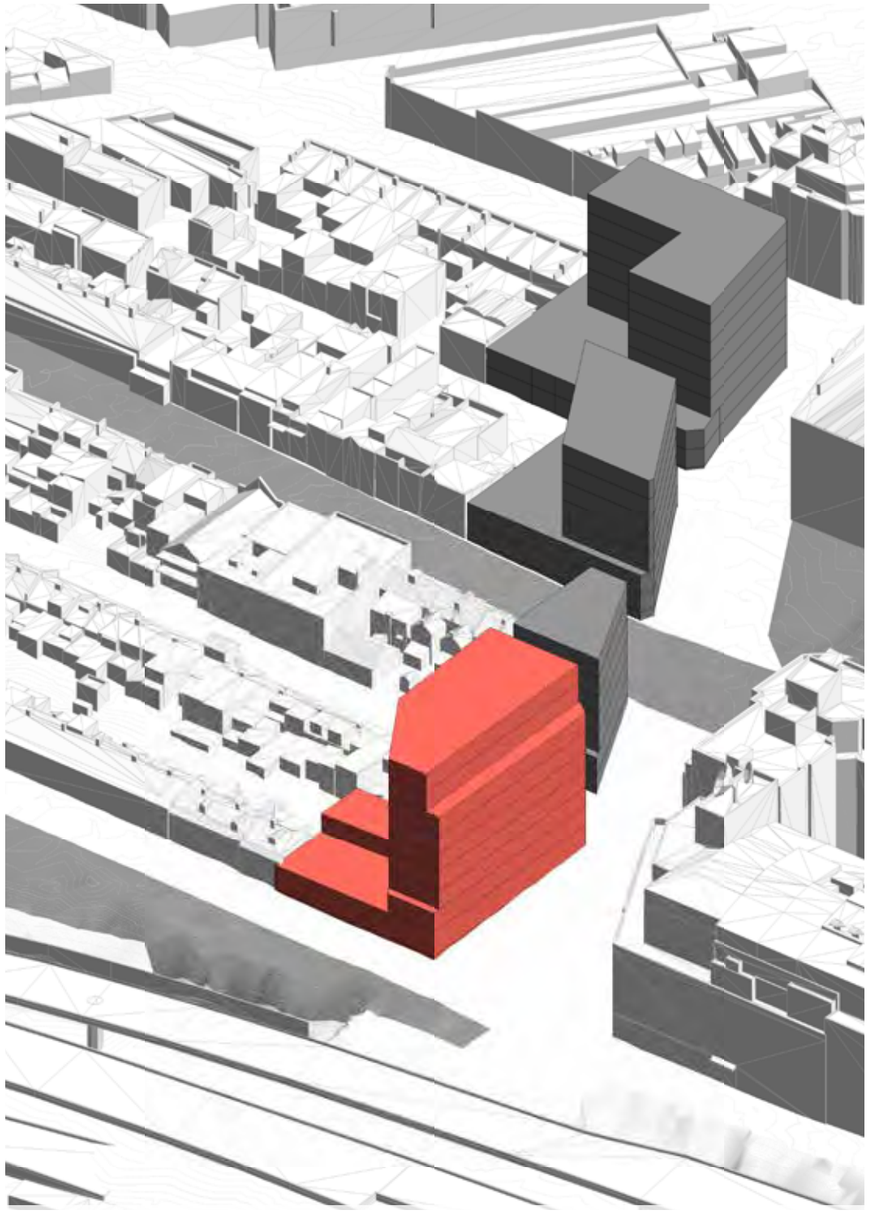
Pyrmont Bridge Road is the primary link between the Blackwattle Bay and the Darling Harbour precincts and requires a special character when considering future development.

The desired urban character of Pyrmont Bridge Road seen throughout this report, proposes an increase in diversity of program, scale of architectural typology and height of building forms. Establishing opportunity to increase the scale of development on Pyrmont Bridge Road within the proposed sub-precinct enables improvements to the design of the public domain on this important linking corridor between Blackwattle Bay and Darling Harbour. The new Metro Station provides appropriate infrastructure to support this concept.

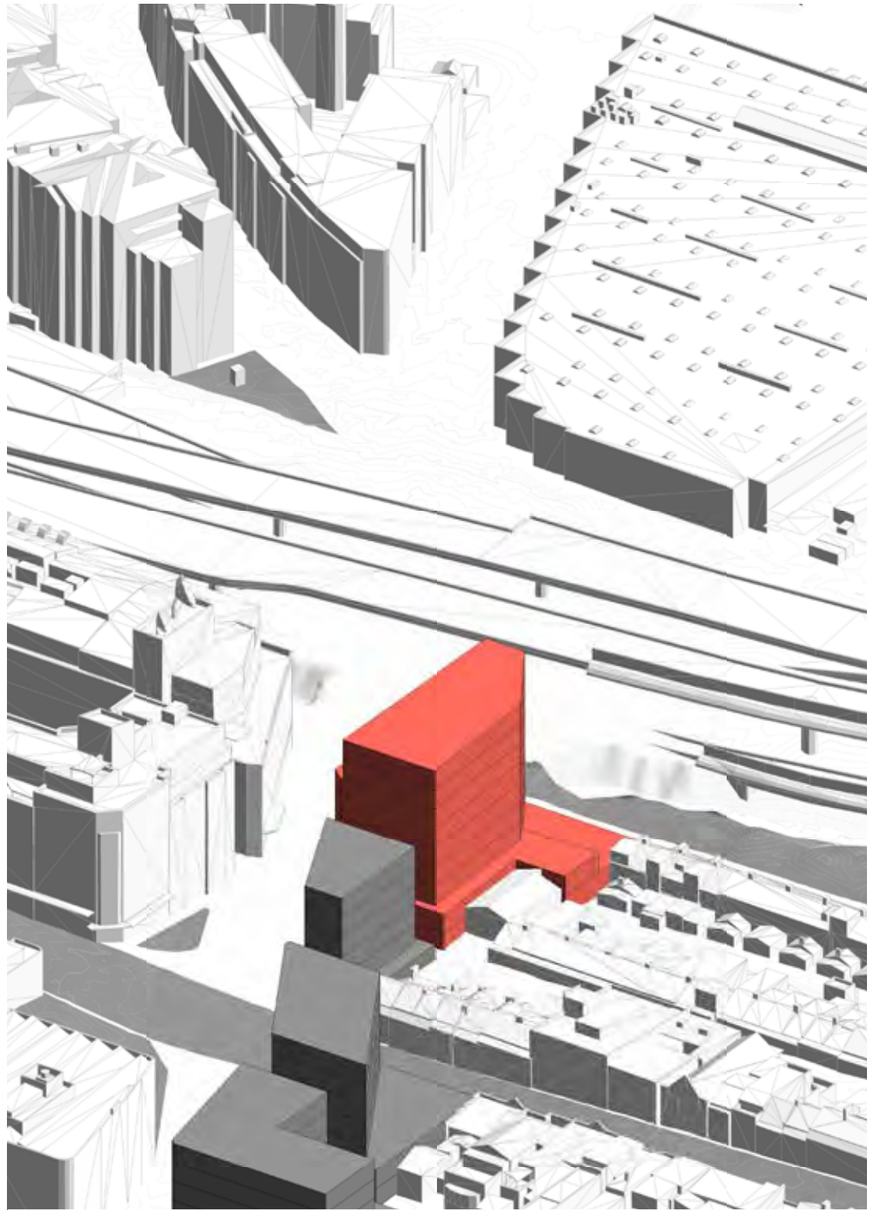
Larger scale buildings will provide the smaller residential neighbours to the north acoustic separation and visual protection without significantly reducing access to sunlight.

Any outcome that desires to change sunlight access to public open spaces will be carefully designed and studied to not only protect these spaces but look to increase their function and amenity to improve the public realm

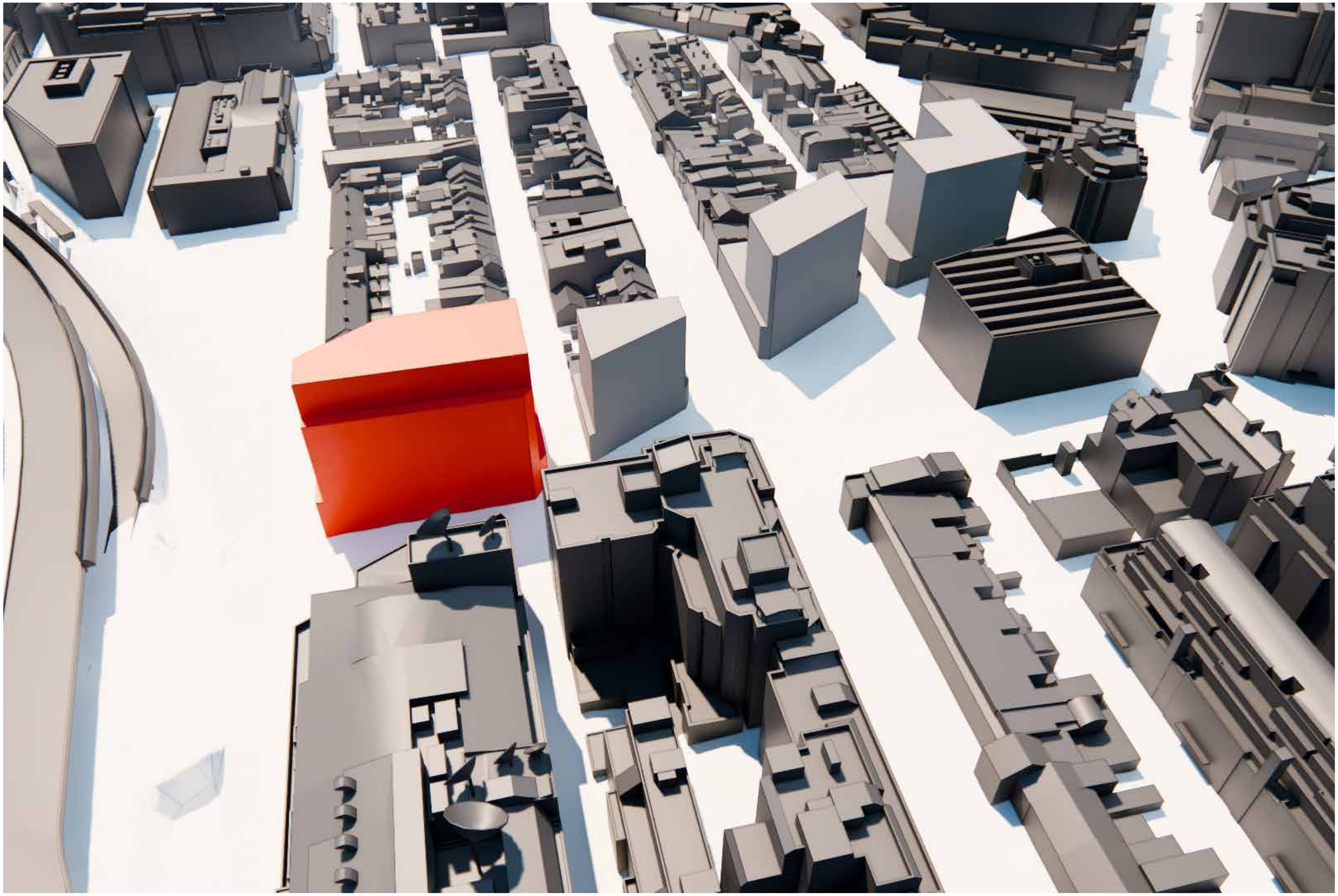
For Pyrmont Bridge Road to become a vital, attractive destination and connector between special precincts to the East and West, strategic changes to the existing development controls are required.

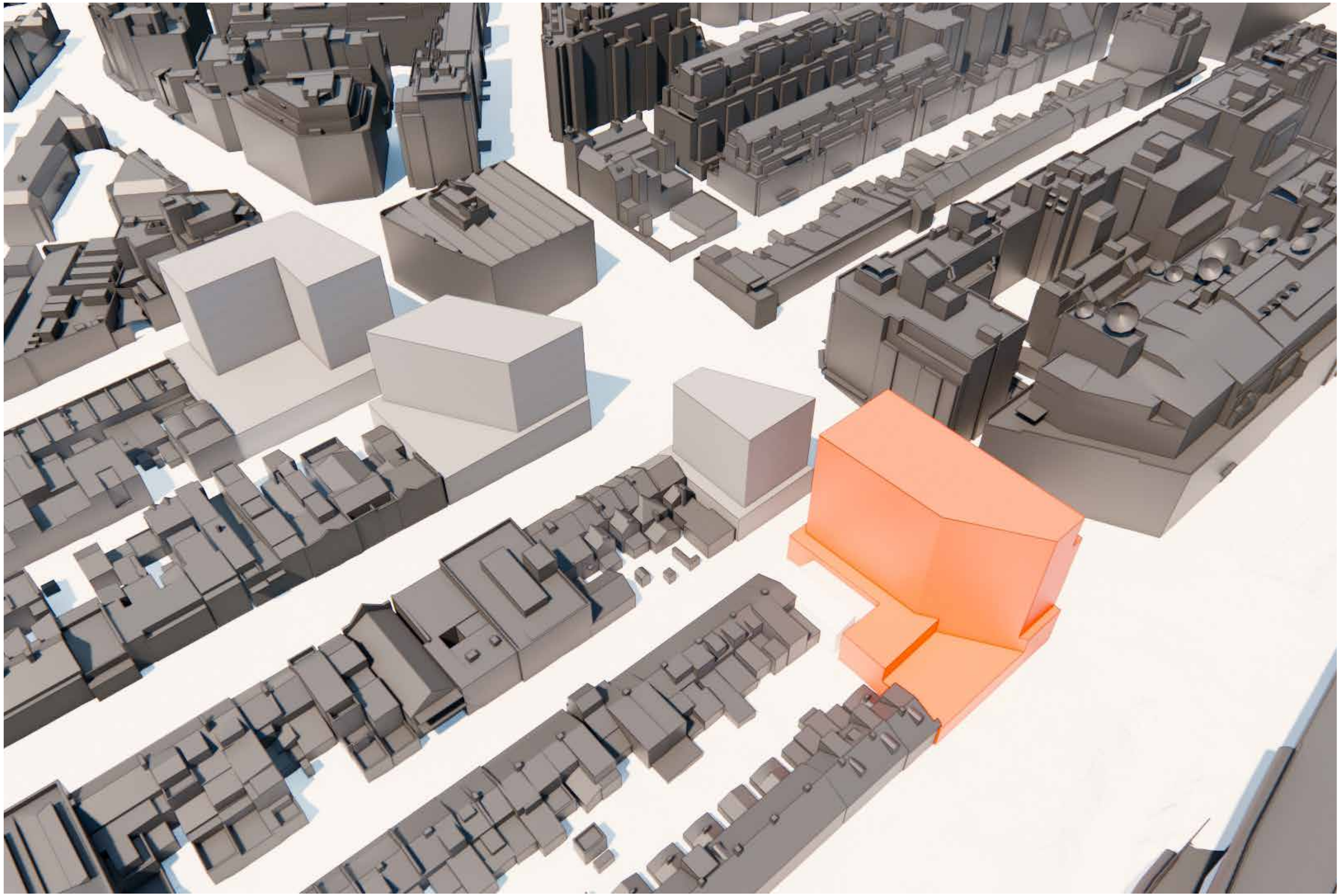


Massing Envelope - View From SW



Massing Envelope - View From NE



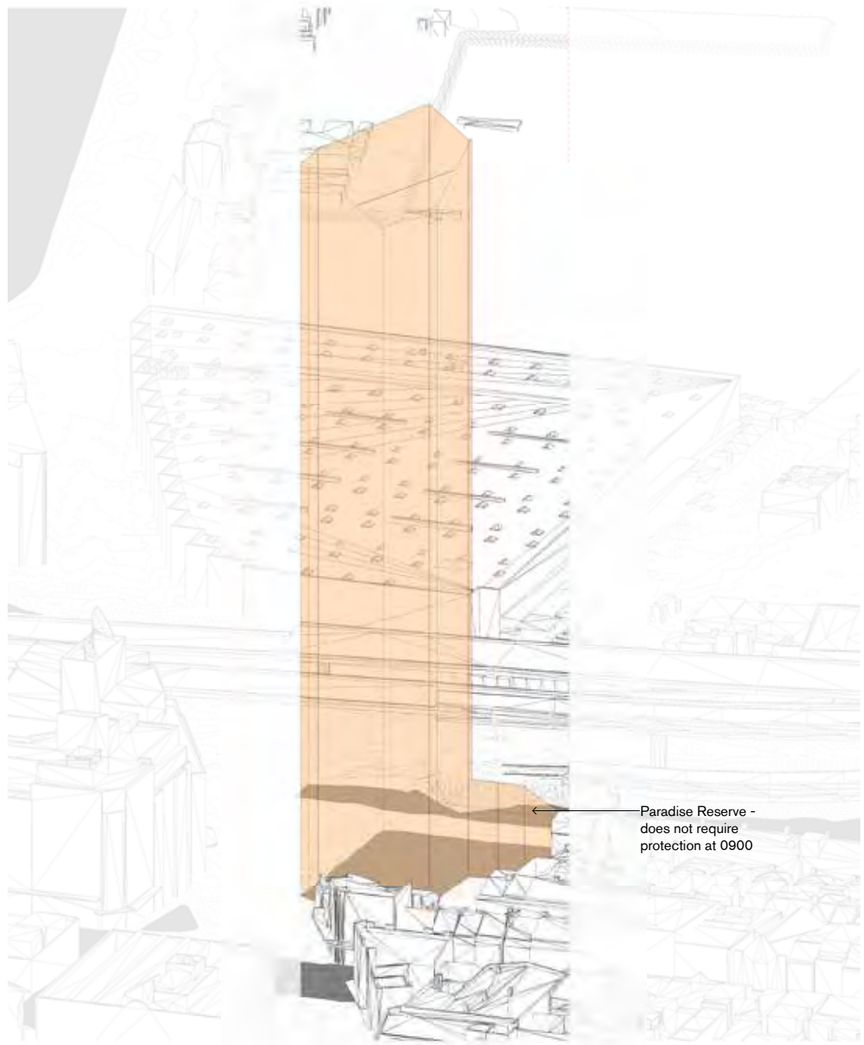


Appendix

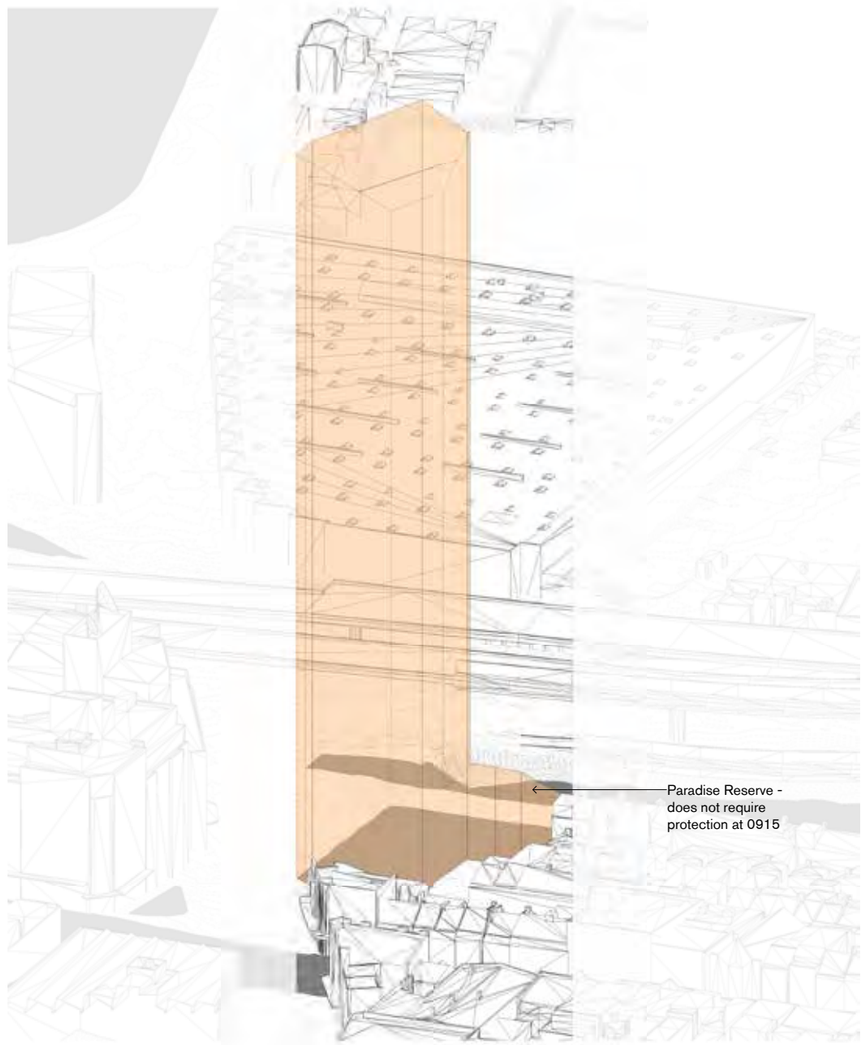
08

8. Appendix

8.1 View from the Sun Solar Protection Study



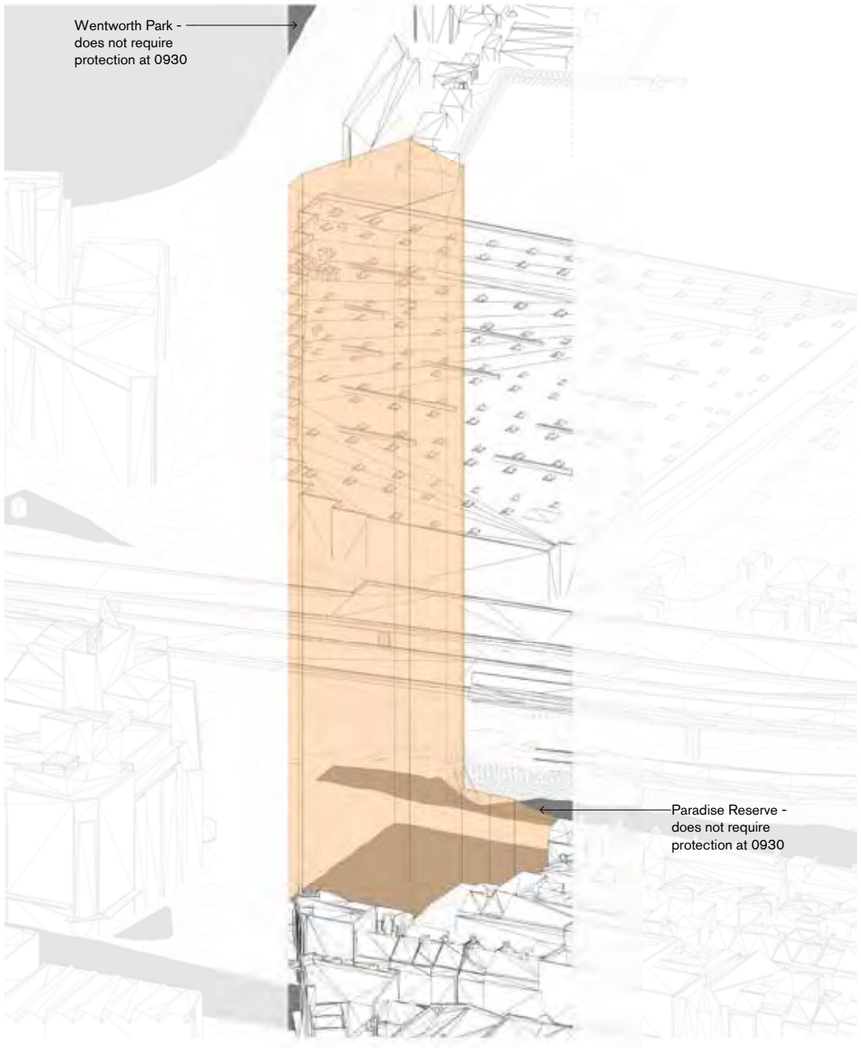
21st June 0900 - View from the Sun



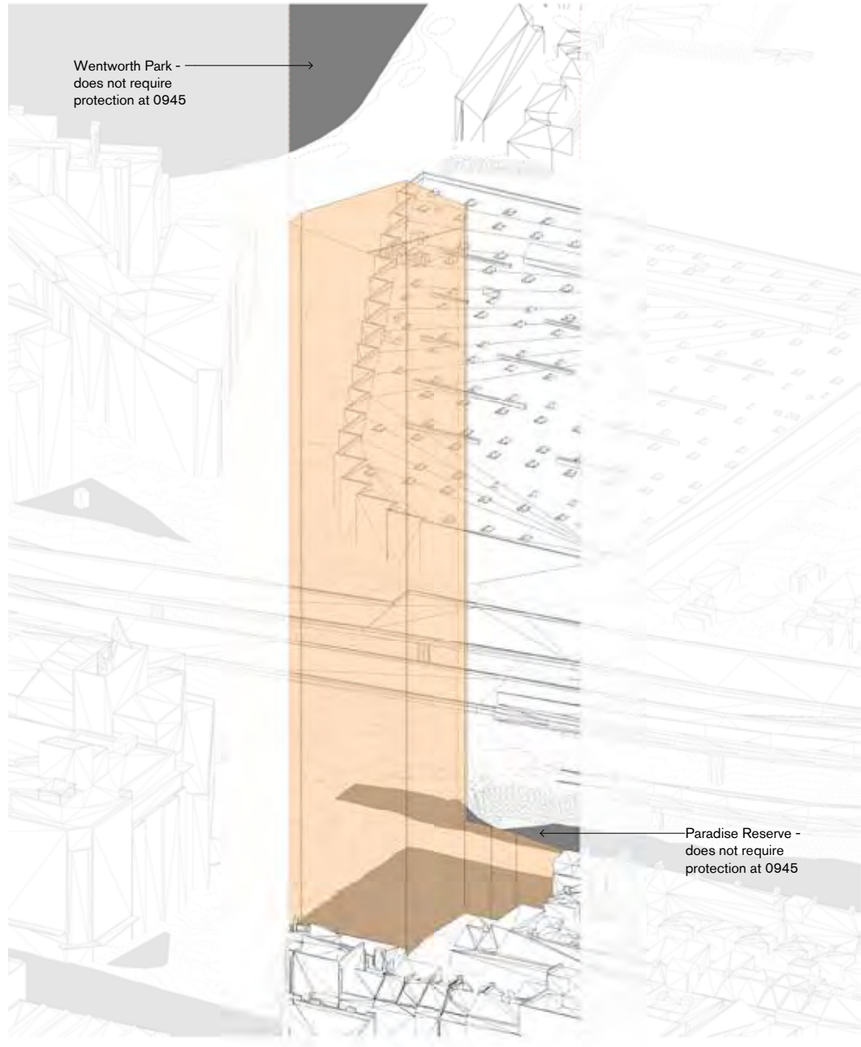
21st June 0915 - View from the Sun

8. Appendix

8.1 View from the Sun Solar Protection Study



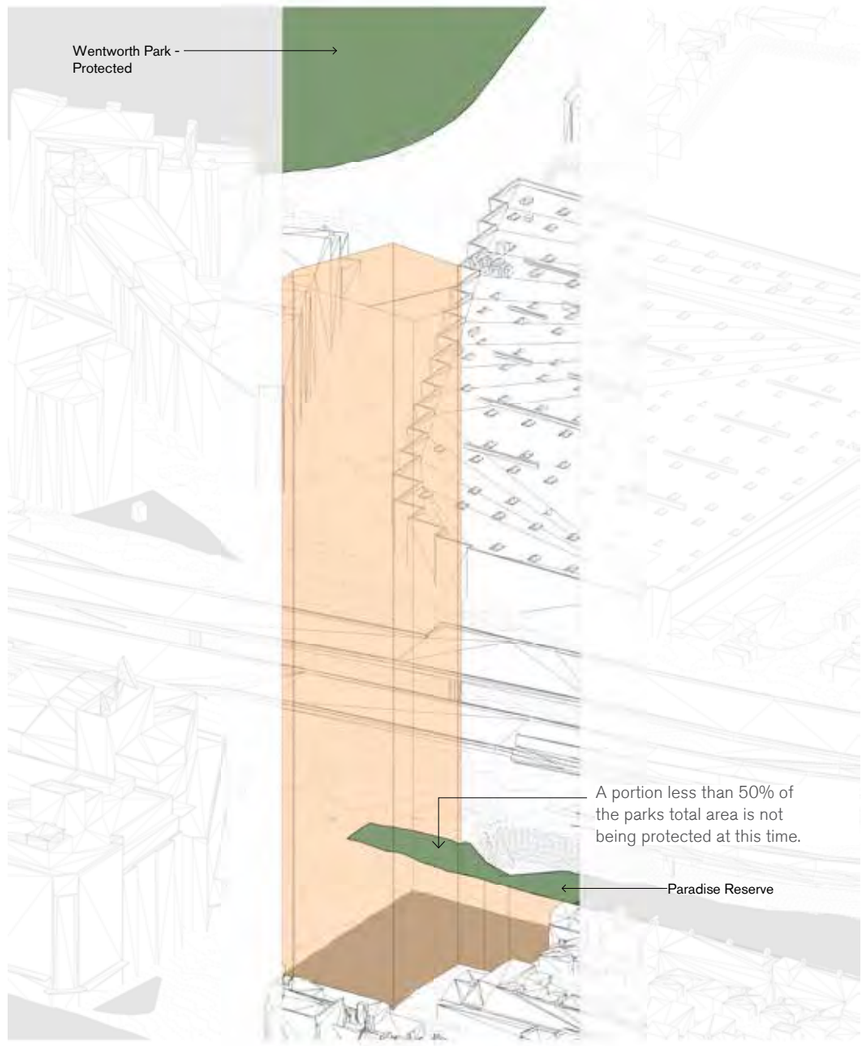
21st June 0930 - View from the Sun



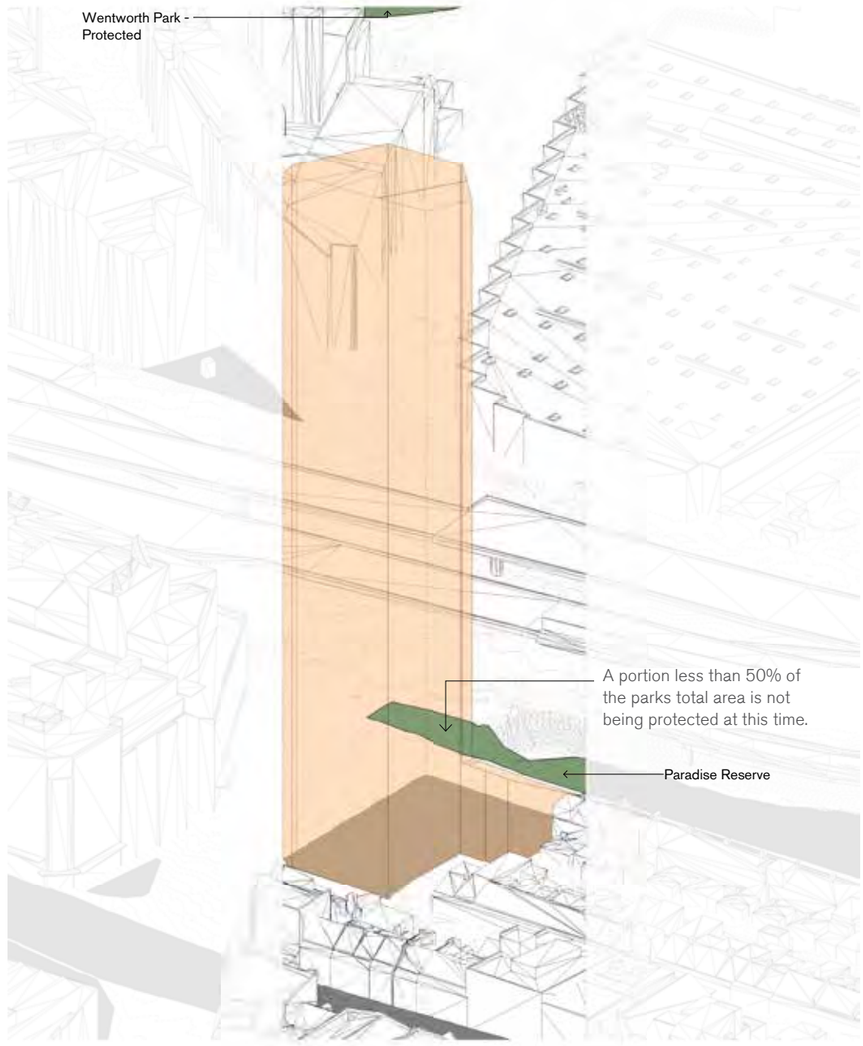
21st June 0945 - View from the Sun

8. Appendix

8.1 View from the Sun Solar Protection Study



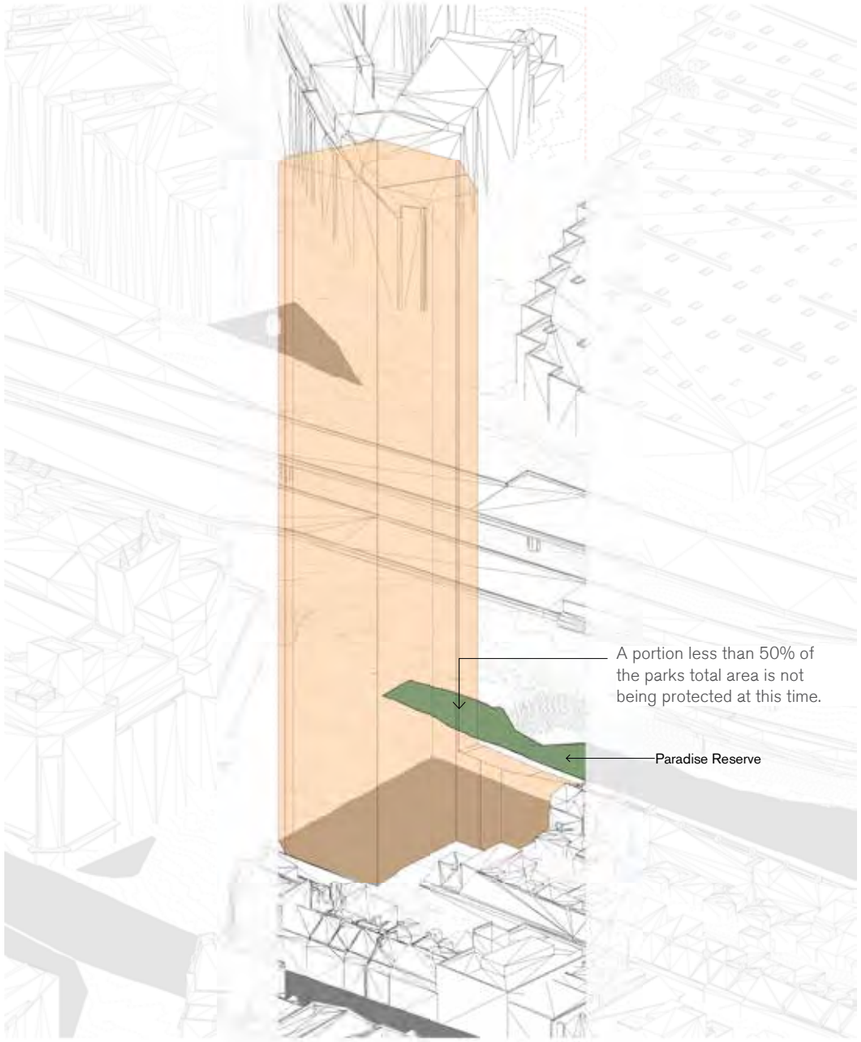
21st June 1000 - View from the Sun



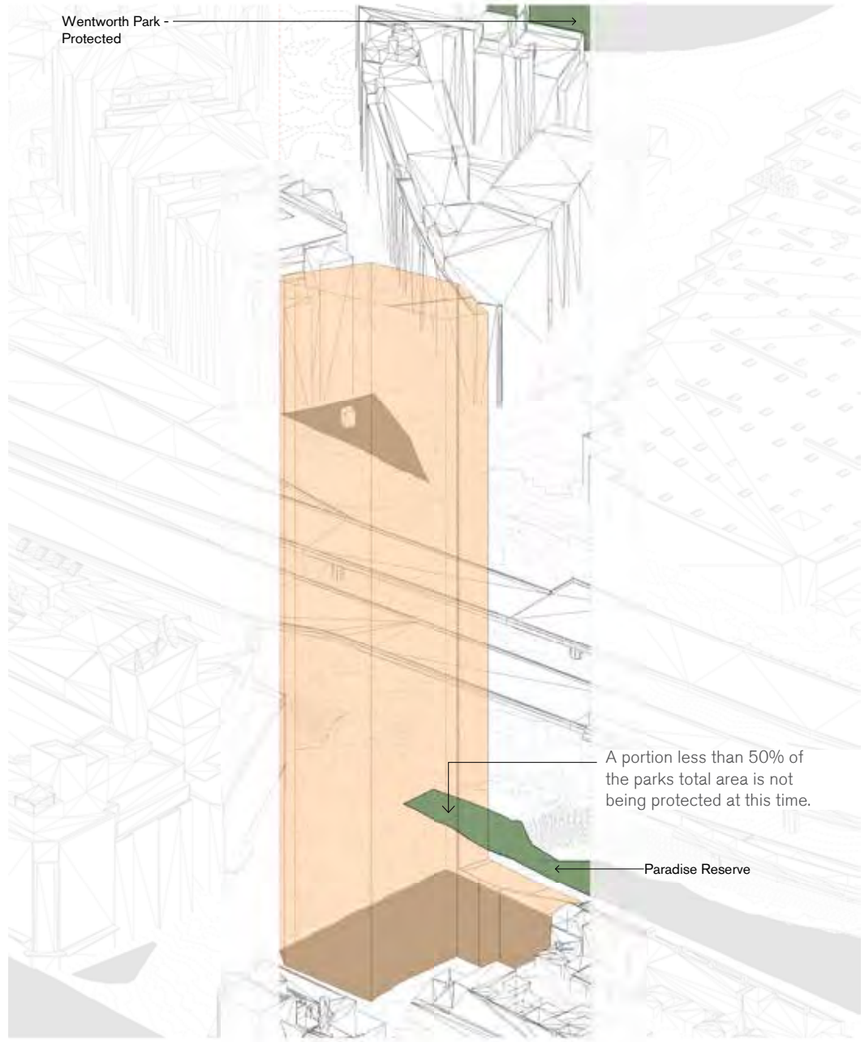
21st June 1015 - View from the Sun

8. Appendix

8.1 View from the Sun Solar Protection Study



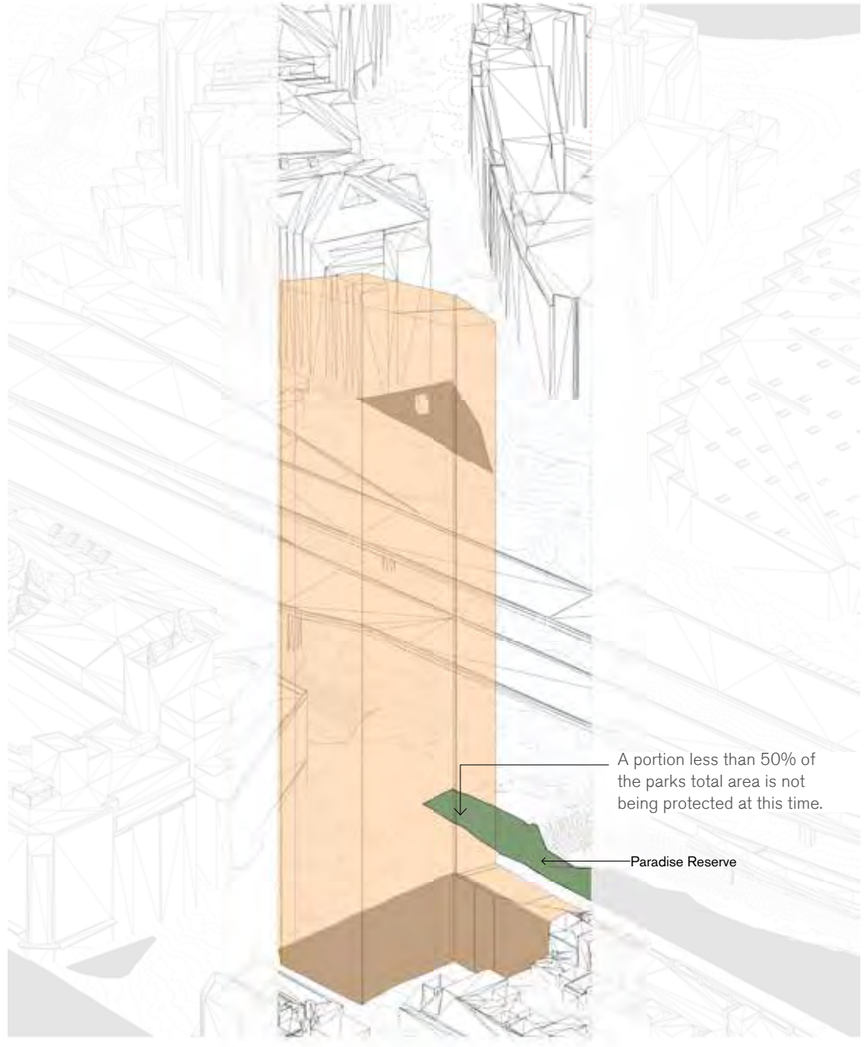
21st June 1030 - View from the Sun



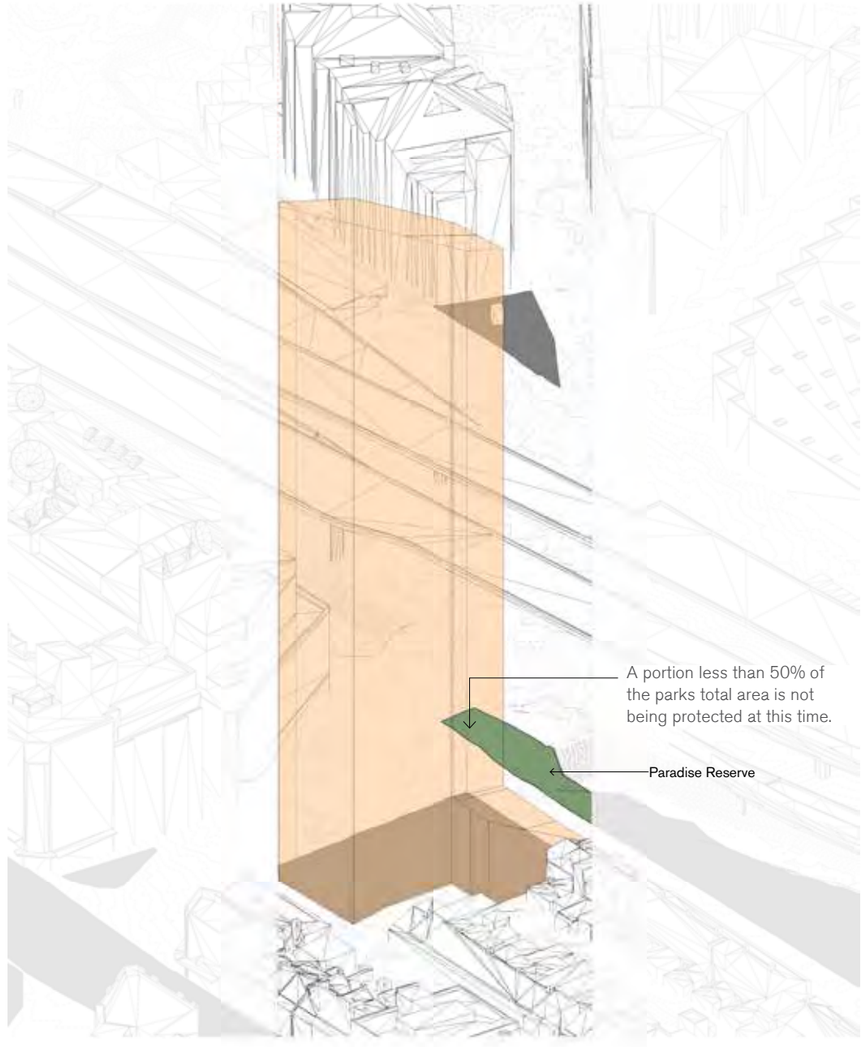
21st June 1045 - View from the Sun

8. Appendix

8.1 View from the Sun Solar Protection Study



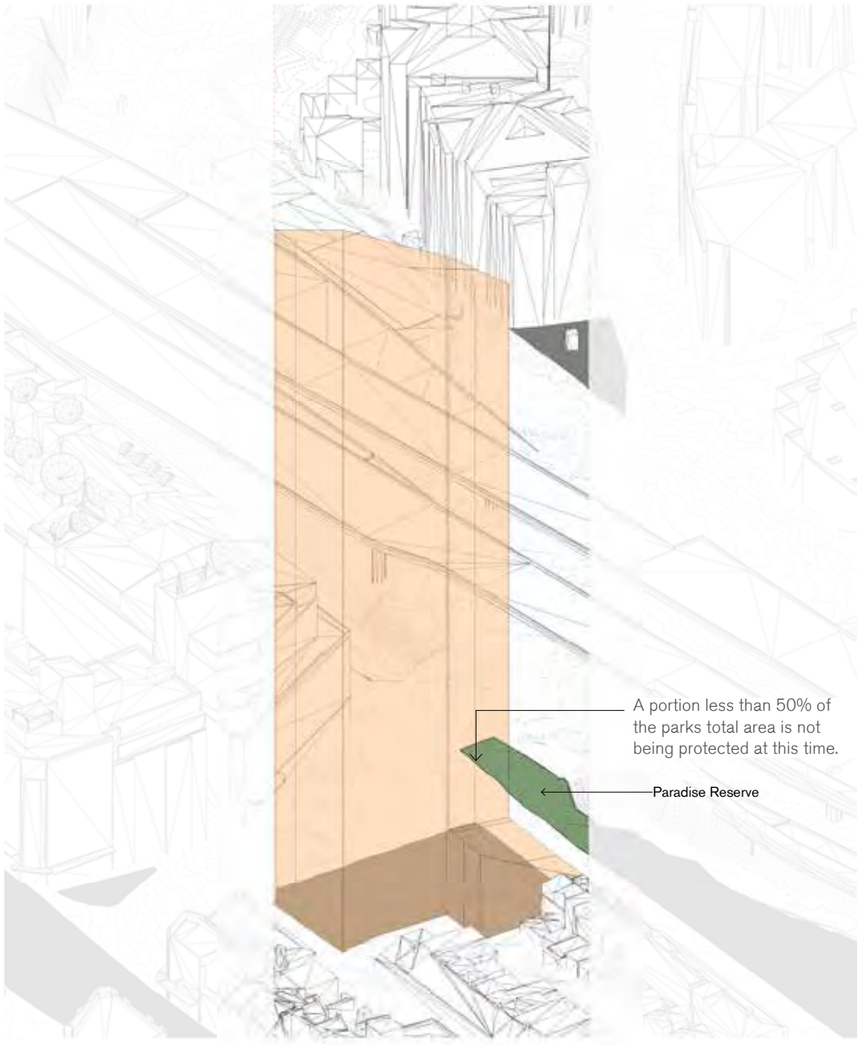
21st June 1100 - View from the Sun



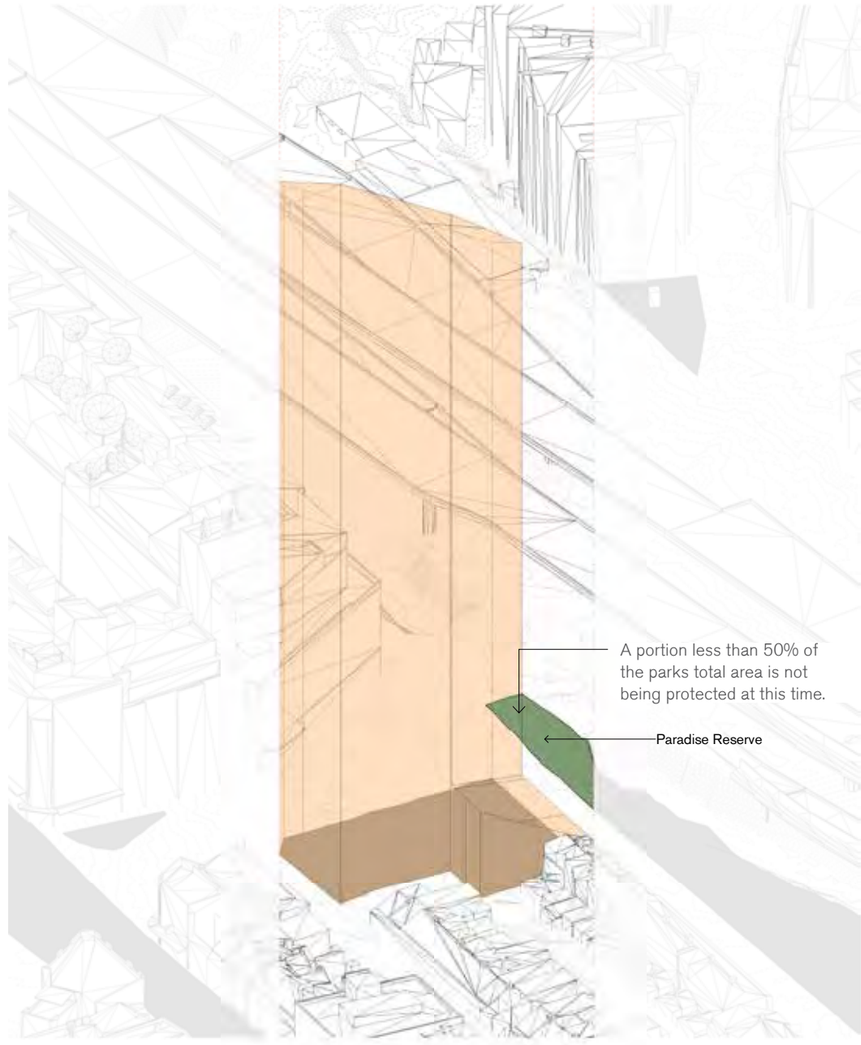
21st June 1115 - View from the Sun

8. Appendix

8.1 View from the Sun Solar Protection Study



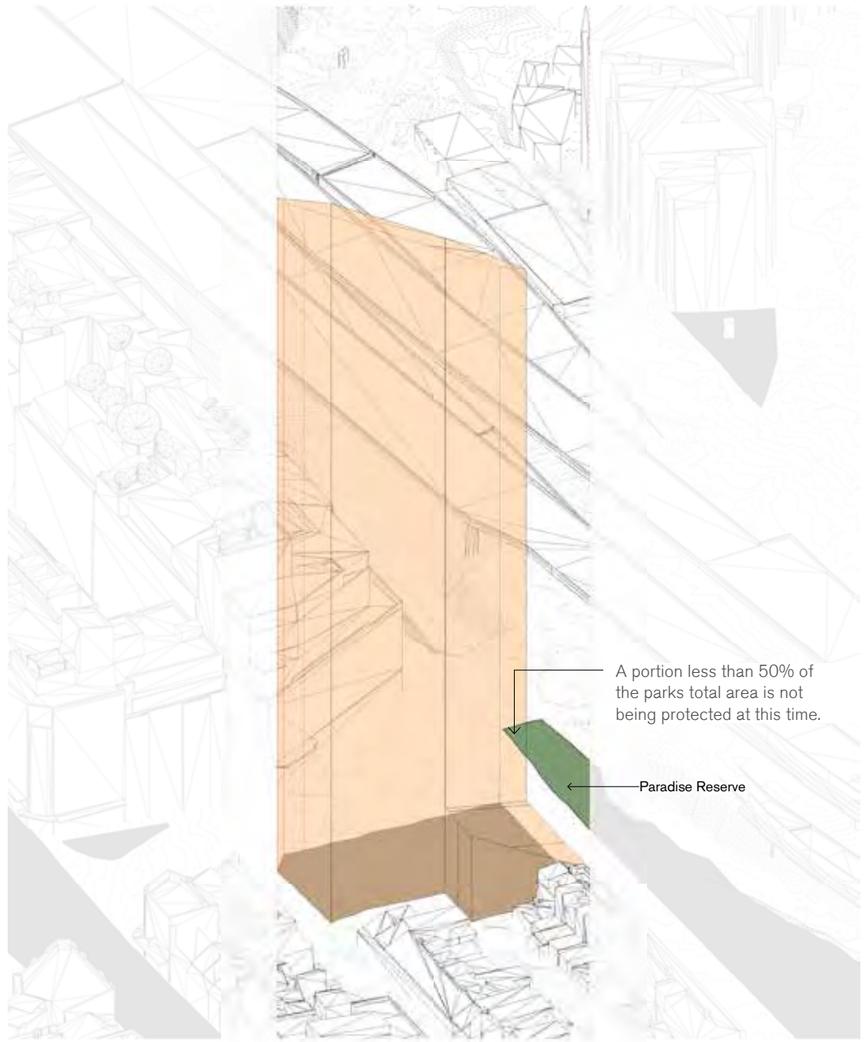
21st June 1130 - View from the Sun



21st June 1145 - View from the Sun

8. Appendix

8.1 View from the Sun Solar Protection Study



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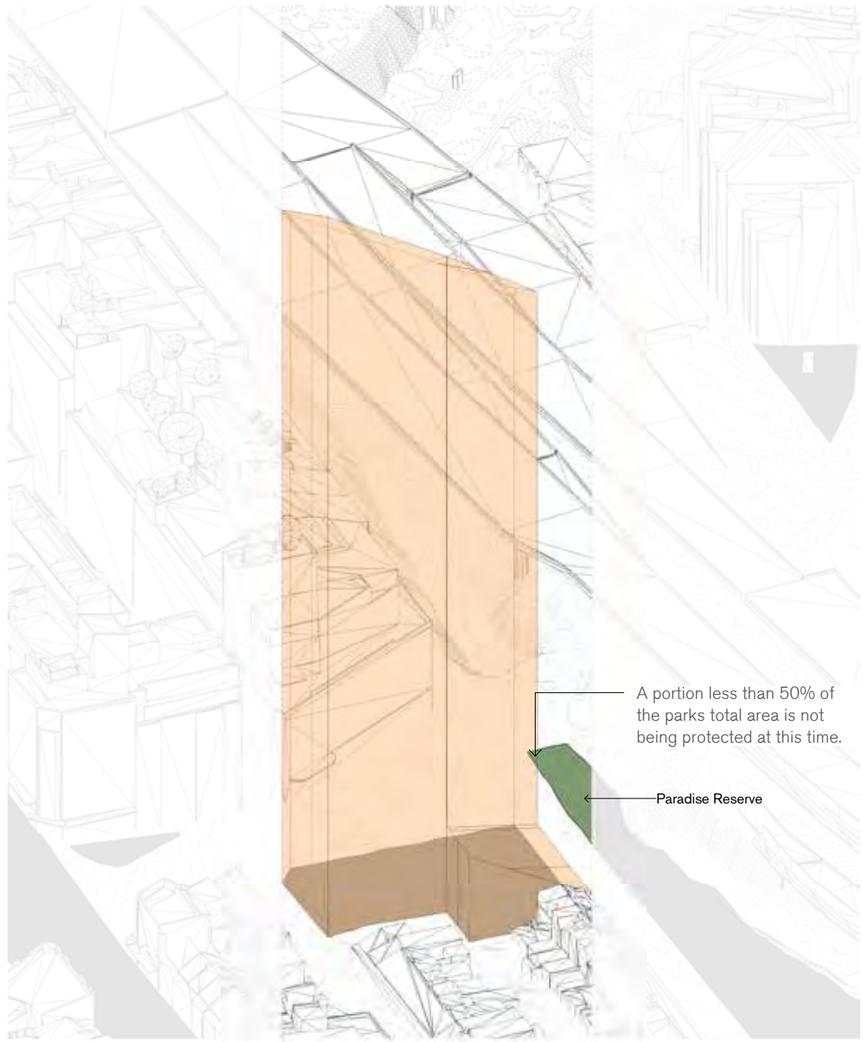
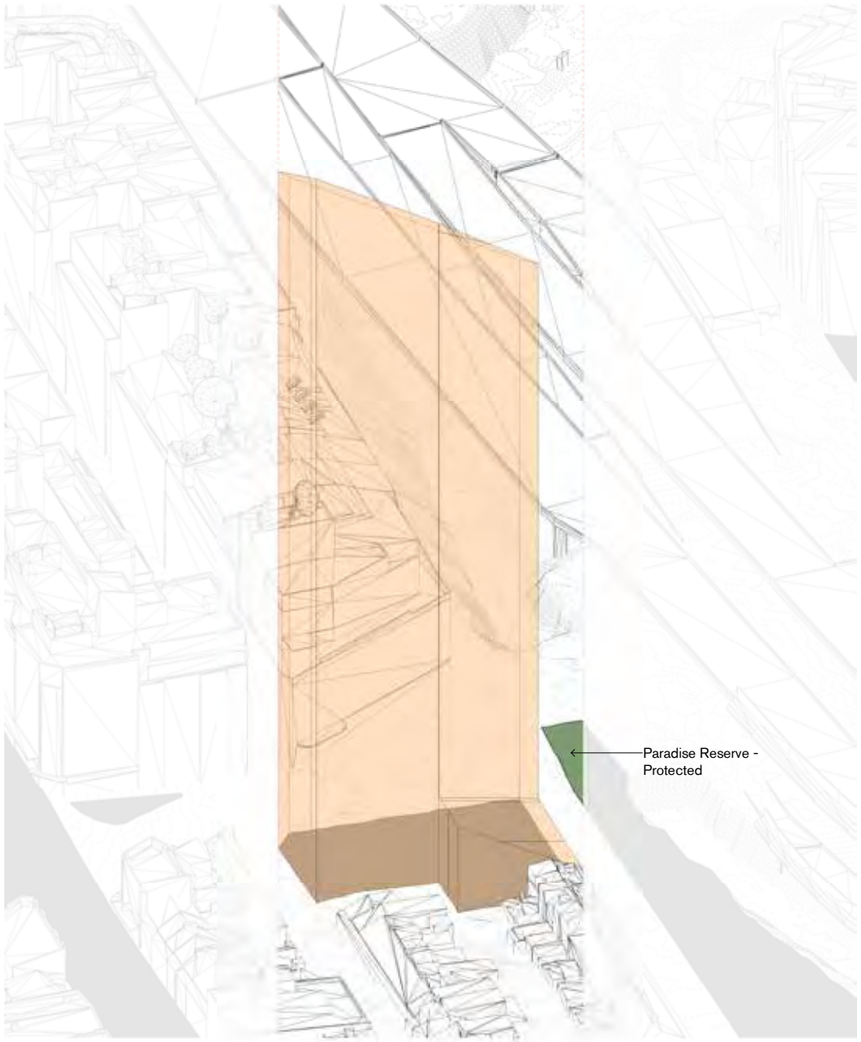


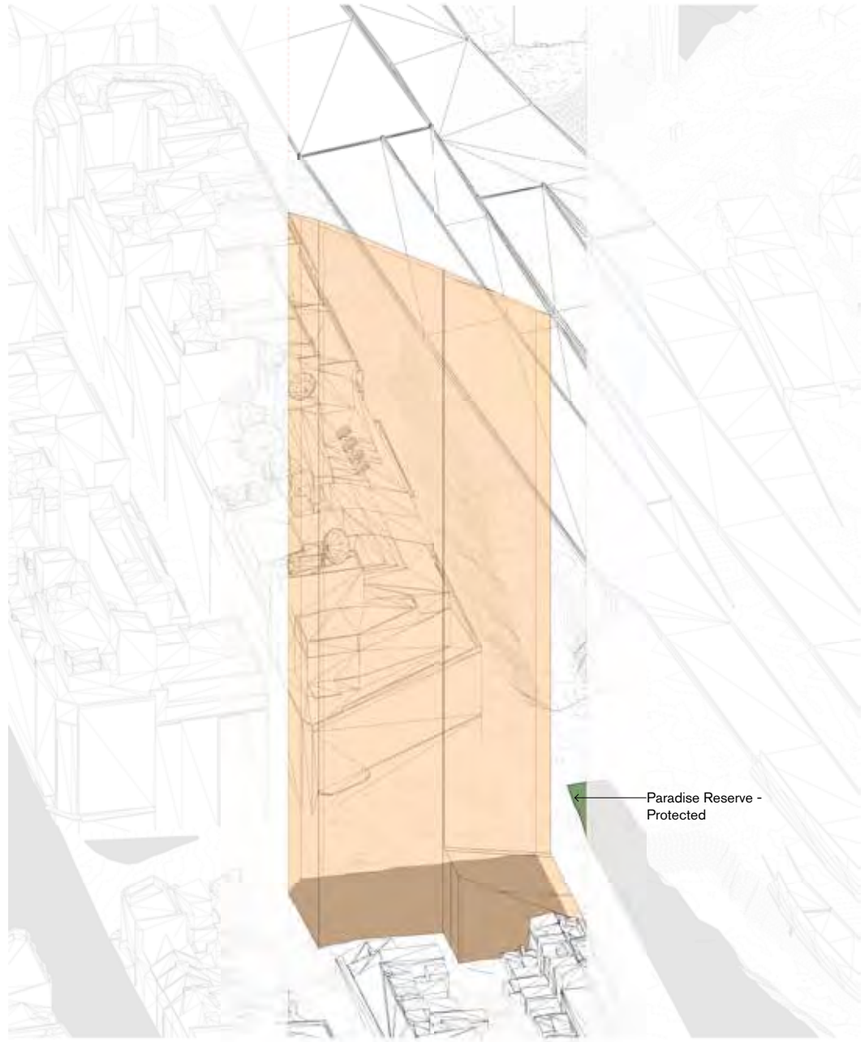
21st June 1215 - View from the Sun

8. Appendix

8.1 View from the Sun Solar Protection Study



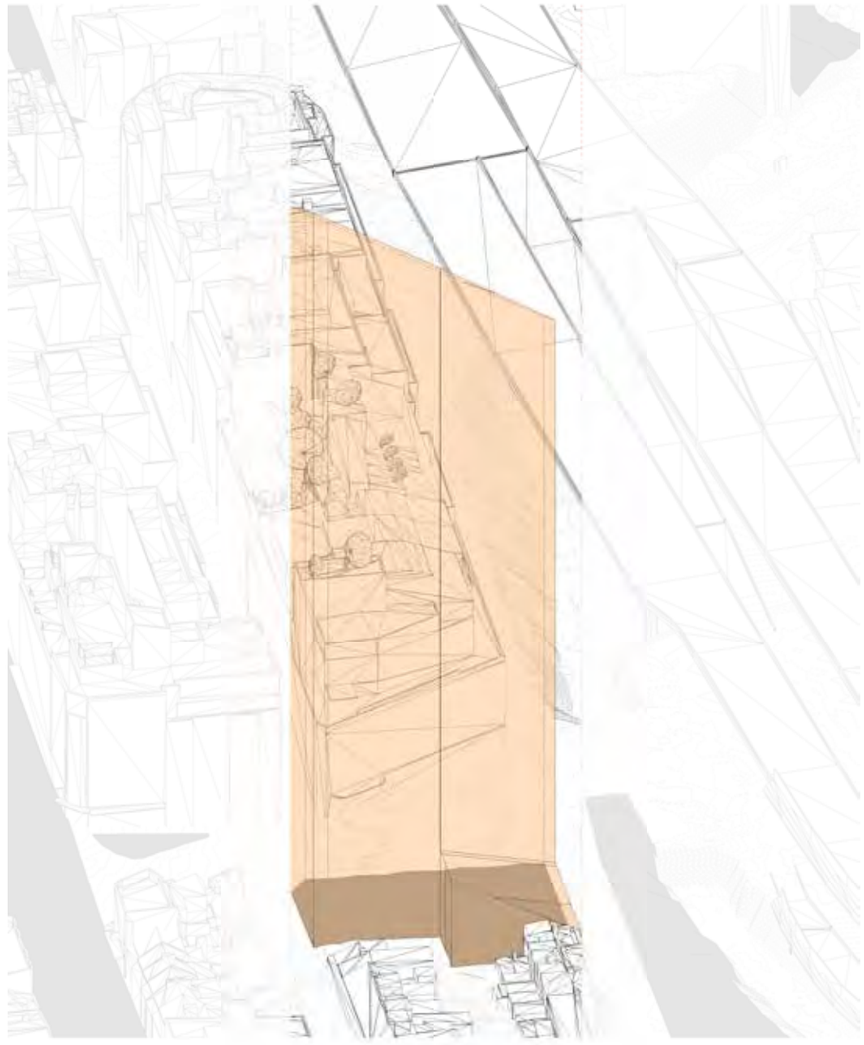
21st June 1230 - View from the Sun



21st June 1245 - View from the Sun

8. Appendix

8.1 View from the Sun Solar Protection Study

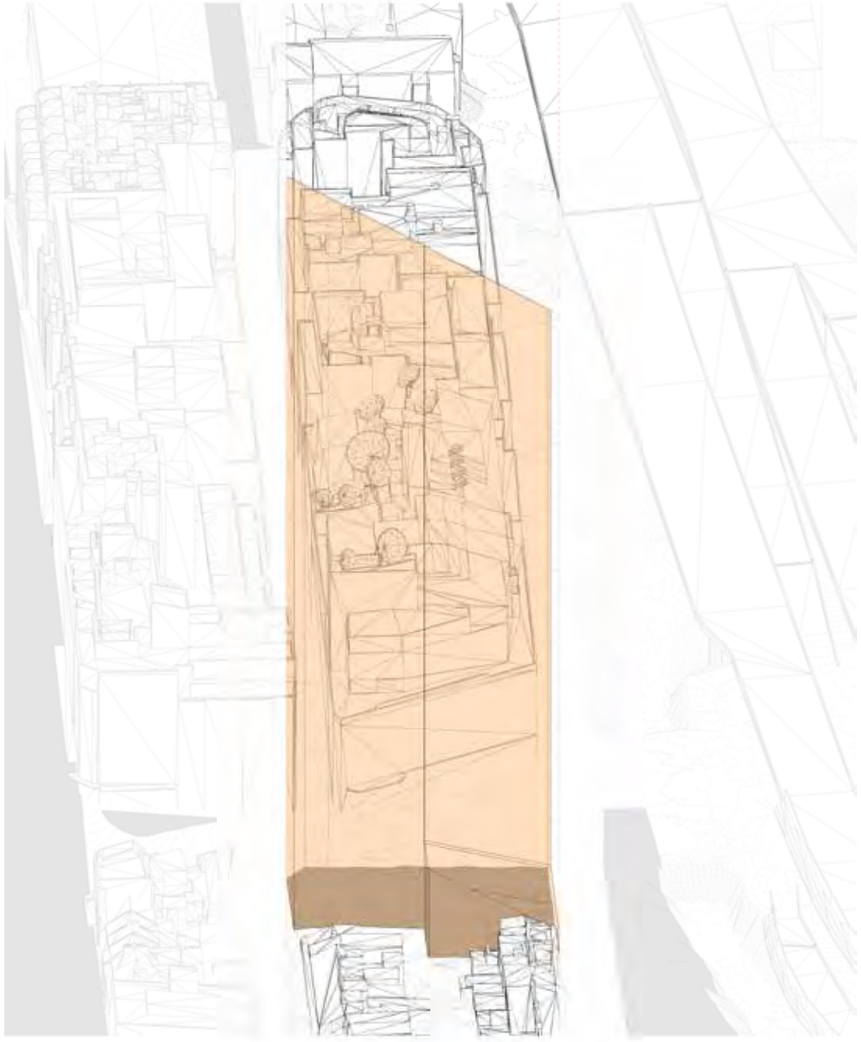


21st June 1300 - View from the Sun

21st June 1315 - View from the Sun

8. Appendix

8.1 View from the Sun Solar Protection Study



21st June 1330 - View from the Sun

21st June 1345 - View from the Sun

8. Appendix

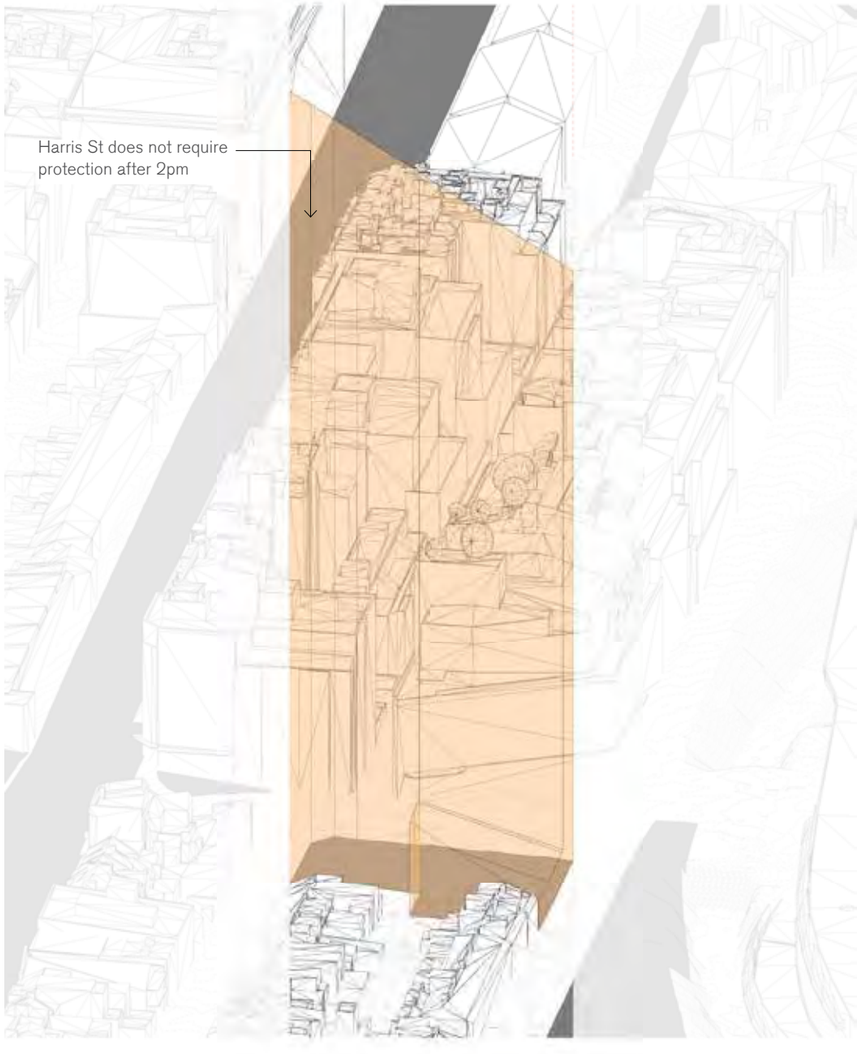
8.1 View from the Sun Solar Protection Study

21st June 1400 - View from the Sun

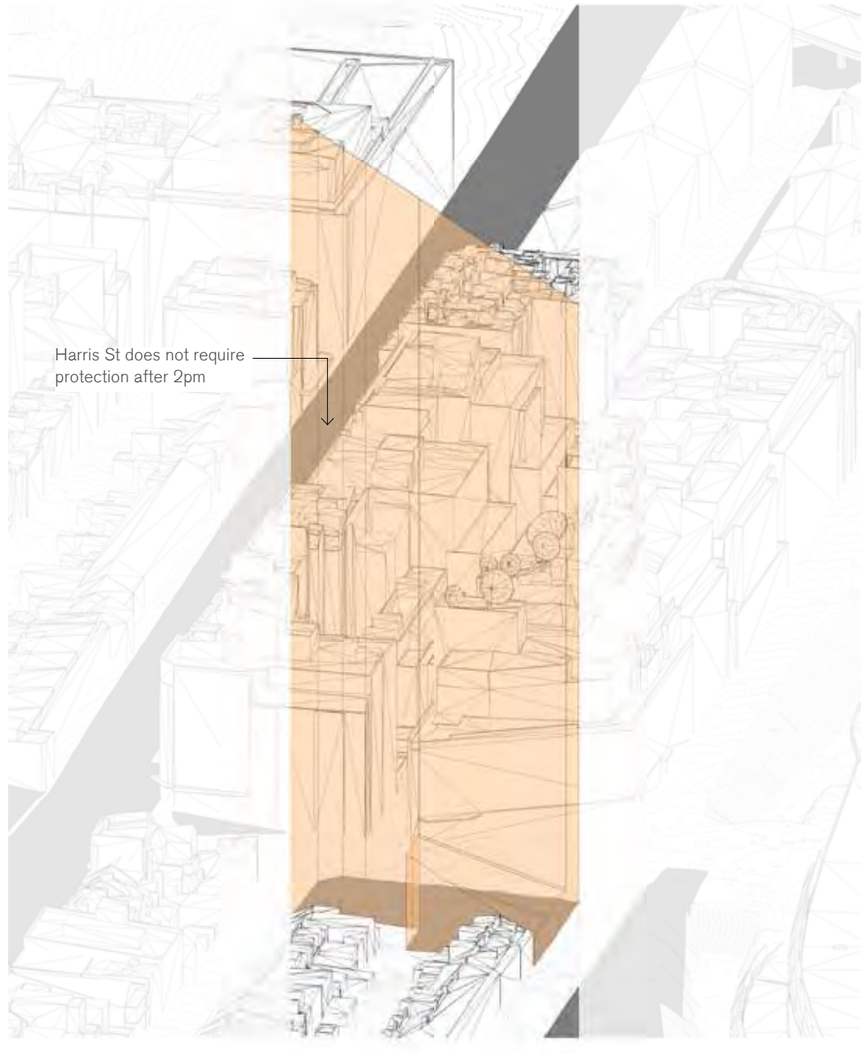
21st June 1415 - View from the Sun

8. Appendix

8.1 View from the Sun Solar Protection Study



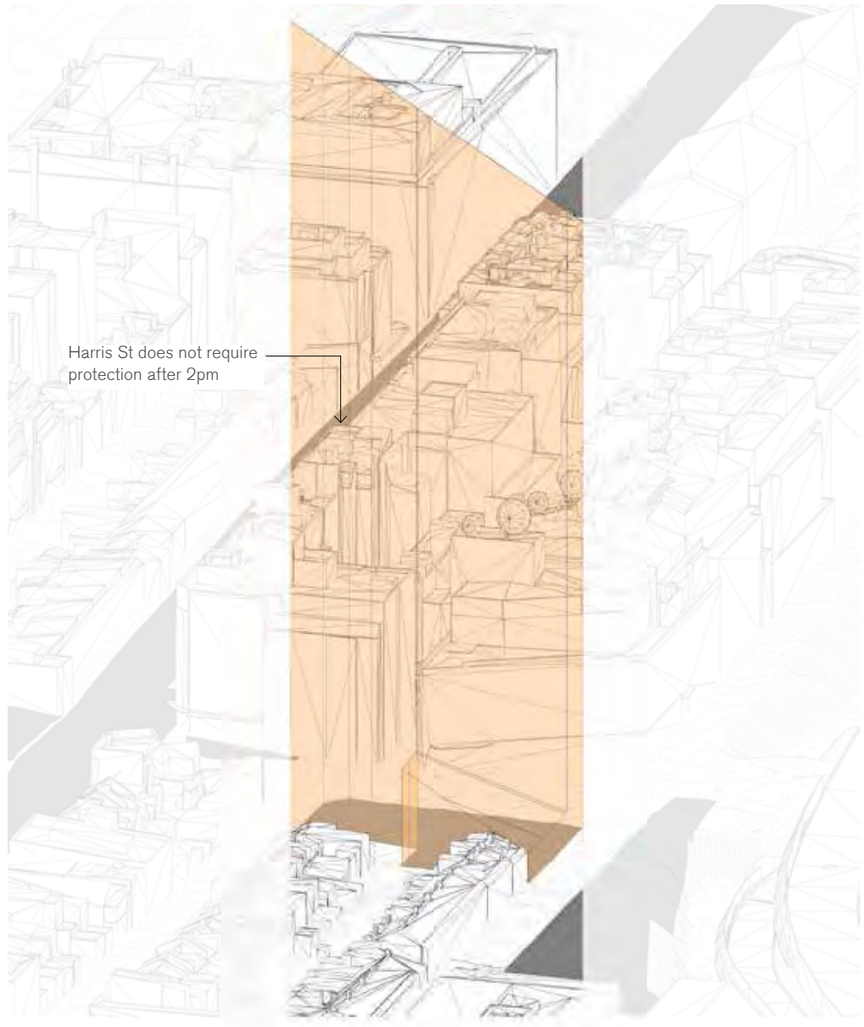
21st June 1430 - View from the Sun



21st June 1445 - View from the Sun

6. Case Study: 46-48 Pyrmont Bridge Road

8.1 View from the Sun Solar Protection Study



21st June 1500 - View from the Sun

Tzannes GYDE

Prepared by Tzannes Associates Pty. Ltd.

GYDE Consulting

Contact Alec Tzannes (Tzannes)

Stephen Kerr (GYDE)

183436

Khoei

Pyrmont, 2009

19/08/21

Natalie Khoei & Anosh Kanagaratnam

169/102 Miller St, Pyrmont NSW 2009

Attn: NSW Government

RE: Blackwattle Bay Precinct Plan â€" Urban Design Statement

Thank you for your redevelopment proposal for Blackwattle Bay. Please see below the design principles of which we are in agreeance with however we feel they were neglected in some instances (approximately half- which are listed below) with the plan proposed. After discussing the principals and how well the proposal aligns with your proposal for redevelopment, we will provide our recommendations for another proposal to provide an all encompassing solution.

Principal 1: Improve access to Black Wattle Bay, the foreshore and water activities for all users.

Unfortunately the proposed plan further limits access to Black Wattle Bay, the Foreshore and water activities due to the proposed development of extensive commercial and residential spaces.

With an increase in residents and businesses, this has obvious implications for access to the foreshore physically from both an infrastructure point of view and availability/access point of view due to the increased foot traffic and car traffic in the area.

Principal 5: Balance diverse traffic movements and parking needs for all users.

Sadly, the roads surrounding pyrmont already struggle with traffic in the mornings and afternoons (Miller street, Harris Street, Pyrmont Bridge Road and Bank Street) and there is no doubt that the increase in business and residential activities will put a further strain on this already existing problem.

Road works proposed will not be sufficient to meet the needs of Pyrmontâ€™s residents with this proposed plan for development.

Principal 9: Maintain and enhance water uses and activities:

As access has been reduced to the water foreshore with the proposed development of mixed commercial/residential buildings, current water use and activities are not able to be maintained as most of the foreshore on the pyrmont side has residential development.

Instead, it is recommended that only half of the proposed development remains hi rises (if required) on the corner of bank street and pyrmont bridge road where the current fish markets are located as of August 2021.

Instead, the proposed cultural centre and waterside park should be relocated adjacent to bank street (Where buildings 10, 9 and 7 are in your proposal) and a community pool also built here as well (similar to Alfred Park Swimming Pool in Surry Hills but without the design flaws with regards to the wind tunnel that they have created funneling into the pool).

Buildings 10 9 and 7 should be relocated to be in front of buildings 3 & 2 and should be no higher than 8 stories. The Foreshore should subsequently be extended to allow for greater community spaces and a promenade walkway which will no doubt be busy as it wraps around the shoreline to connect to the rest of the city.

Principal 10: Allow for co-existence and evolution of land uses over time.

Unfortunately because the proposed development currently covers most of the foreshore, with no real open land- it does not allow for co-existence and the land cannot be evolved over time as once these buildings are built (high rises) they are somewhat permanent. It is therefore imperative to have open spaces available for the community to enjoy not surrounded by hi rise buildings.

It is also important to note that a morning shadow will cover the promenade and walkways which is an obvious deterrent for people to go for morning walks here to enjoy the sun along this foreshore walkway.

To avoid this and to be mindful of the shadows imparted by tall structures it is important to cluster the buildings together where there will already be shadowing.

Furthermore, having open spaces as depicted in the images below will allow for more community initiatives and gatherings to take place in the park as it will not be surrounded by hi rise buildings.

This can include things like cinema in the park (as they do at Sydney Olympic Park) or even community fairs and events to take place here in the future. It will also be more enticing for

businesses and organizations to hold events at the park which will have sunlight in the mornings and not be overshadowed by a concrete jungle.

There should also be barbeque areas for people to enjoy the water, the sun and the beautiful vibrance of Pyrmont. This park should also be named the ANZAC park/promenade in remembrance of our VETS and could potentially be a future place of importance.

There should also be an indidgenous cultural centre which people can visit. This walkway will be important and it is imperative that community initiatives are recognized and obviously it will be a place for people to thereby visit, both locals and tourists from all of over the world.

It would be an incredible opportunity to put Pyrmont on show to the rest of the world. Tourists can start at the city and walk down along the shore to see various sites and finish up at the fish markets. This will obviously be unenticing if the entire foreshore has apartment buildings shadowing it as per the current development plans.

Principal 11: A place that is inviting, unique in character, socially inclusive and affordable.

Again, the proposed development does not support this principal. It is simply uninviting with the proposed high rises spanning the foreshore and the subsequent shadowing that will occur.

Further, it is not unique as you can see a similar proposal/ layout in the Ryde/ Rhodes area. It would be much better to group the buildings together and not in a line along the foreshore to free up open space which as we all know is inviting and can have multiple purposes.

If a pool is built, people could obviously sunbathe without feeling insecure about on looking eyes from buildings and residents.

With regards to affordability in Sydney, it has never been affordable. It is simply impossible to do such a task without overpopulating and overwhelming the current infrastructure in Pyrmont.

The proposed development may increase supply of dwellings however this should not be at the expense of other things. If anything there would now be an oversupply to keep things affordable which would have obvious implications to the overall build quality which would therefore make it not unique in character or inviting at all. Quality always outweighs quantity.

Social inclusion can only be achieved if more open land and areas are maintained as well as incorporating other initiatives already mentioned.

Principle 12: Expand the range of recreational, community and cultural facilities

Although the current proposal does make some attempt to do this, it is outweighed by the proposal to build numerous hi rises along the foreshore.

It is certainly disappointing that one principle (principle 8) has had such great importance to outweigh every other principle in this plan.

It is clear that there are other motivations at play here and it is disappointing to see the community pay the price in the corporate pursuit for profiteering.

It is quite clear and obvious that these residential and commercial developments proposed are the intended developments of highest importance by the redevelopment committee which obviously does not serve the community as well as open park lands, facilities (cultural centre, community centre, library and pool) and design would.

As a means to compromise and balance commercial & corporate pursuits with community needs & values below we have suggested an alternative.

Either do not build the apartment buildings 10 - 6 or relocate them to be in front of buildings 2-3 to minimize the shadowing and have more space and separation between public and private areas.

Further the foreshore and promenade should be extended onto the bay to create more room for a walk way and facilities.

Principle 13: Plan for the future communityâ€™s education, health, social and cultural needs.

Sadly, this principle has been neglected completely. The proposed development does not have any plan to facilitate the development and improvement of the communityâ€™s education, health, and social needs.

A library should be built to provide the community with this as well as open space to encourage people to play sport in the park, with barbeque facilities as well to address social needs also.

Principle 14: Deliver development that is economically, socially, culturally and environmentally viable.

Unfortunately, this development that is proposed is not socially or culturally viable. The direct impacts to the environment, I would argue are more to the physical and social environment as opposed to the natural/ecological environment. This redevelopment plan is not a viable option.

We implore you to strongly reconsider your proposed redevelopment plans as you will realize it is not in line with the design principles of what should be reflected in the redevelopment proposal. If these design principles were to be neglected totally, which they have been in the current

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Kindest,

Natalie Khoei (BArchSt)

Director of Meshki PTY LTD

0466 730 820

natalie@meshki.com.au

Anosh Kanagaratnam (BHSc/Masters Physio)

Director of Home Therapy Australia PTY LTD

0493 043 189

anosh@hometherapyaustralia.com

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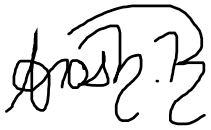


Anosh Kanagaratnam (BHSc/Masters Physio)
Director of Home Therapy Australia PTY LTD
0493 043 189
anosh@hometherapyaustralia.com

Pyrmont
Harris Street
Bank Street
Miller Street
Quarry Master Drive
Fourth Arcade
Third Arcade
no high rises
MAX 5 STORIES
Bank Street
Waterfront Promenade
LIBRARY/ COMMUNITY CENTRE
SWIMMING POOL
Fish Market
North Entry Plaza
Western Distributor
Gipps Lane
Bank Lane
Park Lane
Gipps Street
Park Street
Waterside Park
EXTEND PARK AREA OUT ONTO WATER FURTHER
Blackwattle Bay
Urban Park
Pyrmont Bridge Road
Wattle Crescent
Bridge Road
10
16
14
F
15
1
17
3
2
18

Waterfront Park
Pyrmont
Harris Street
Union Square
Bank Street
Miller Street
Fish Market
North Entry Plaza
Promenade
Blackwattle Bay
Gipps Lane
Bank Lane
Gipps Street
Park Street
Park Lane
Western Distributor
Pyrmont Bridge Road
Wattle Crescent
Waterside Park
Urban Park
Wentworth Park
1 New Sydney Fish Market
2 Contemporary Workplace & Retail
3 Contemporary Workplace & Home
4 Retail / Community / Cultural
5 Community / Retail / Workplace
6 Retail / Workplace
7 Mixed Use / PLO-03-2
8 Mixed Use / PLO-03-1
9 Mixed Use / PLO-02
10 Mixed Use / PLO-01
11 Dragon Boat Storage & Launch
12 Community / Creative / Retail
13 Day Charter Marina
14 Corporate Charter Marina
15 Fishing Fleet Wharf
16 Potential Future Marina
17 Exploration Zone
18 Gathering Circle
19 Rowing and Paddling Course
20 Future Connection to Glebe Island
L Light Rail Station
F Potential Ferry Stop

180411

Knight-Smith

Pyrmont 2009

Please see the attached submission

The proposal to develop Blackwattle Bay has many positive features but this proposal should not proceed before the Pyrmont Peninsula Place Strategy is finalised. The proposed Precinct Plan consists of **towers that will create a wall of buildings** blocking the surrounding area, overshadowing much of the foreshore and surrounding streets, **resulting in wind tunnels** on the foreshore walk and between the buildings.

Blackwattle Bay should not be an extension of the CBD. Pyrmont is primarily residential and is currently the 4th most densely populated suburb in Sydney and Australia(microburbs.com.au). In an era of COVID and potential future pandemics, I would argue that this alone makes the proposal unacceptable. **In light of COVID we should be considering proposals to reduce the density of living. 2800 new residents should NOT be added to an already densely populated suburb.**

Traffic on surrounding roads will be increased in a network leading to the Anzac Bridge. There are no proposals to increase public transport. The Pyrmont Metro station is years away and at a distance; no more light rail stations are being considered; there are no current plans for a ferry service; and the plan for parking is to have no more than the existing number of spaces.

More open space and sporting facilities

Pyrmont has several parks, but no **full-size courts** for any team sport. Pyrmont has many families and it is well known that team sports build a sense of belonging, well being, working together, adherence to rules. Developer contributions from Blackwattle Bay should be dedicated to this much needed facility. 94% of housing in Pyrmont is apartments, needing much more outdoor space for children than families who live in houses with backyards. We cannot just rely on Wentworth Park which is shared by Pyrmont, Ultimo and Glebe

This development should provide an excellent **net health benefit**. The proposal promises a world class, 5 star precinct to benefit residents, workers and visitors. But overshadowing and wind will prevent it reaching its potential for those wanting to walk, run, cycle, sit or relax, whether for physical or mental health.
Some of this can be reduced by biodiversity - **trees** make it cool to walk. With proper planning we could have majestic tree canopies with birds beside a world class Australian city foreshore walkway. **This would ensure a beautiful harbourside walkway from Glebe Foreshore to Woolloomolloo. Something all Sydneysiders could enjoy and be proud of.**

182501

Kolbe

2037

Please see attached PDF

Submission re the Blackwattle Bay development

The proposed development is a massive over development of the site and is contrary to your stated aims. In particular objectives 2, 3, 4, 6 and 8

Objective 2: Deliver a continuous foreshore promenade connecting Glebe foreshore to Pyrmont, which is activated, connected and resilient

- The foreshore is too narrow for the quantity of pedestrians and cyclists, and it will be in shadow for many hours. Walking under freeways is not pleasant !

Objective 3: Design and deliver a high-quality public domain that links Blackwattle Bay to the foreshore and Wentworth Park and integrates with the wider public domain

- The Glebe Island Bridge should have been part of this proposal as that would truly provide integration of the Balmain peninsula with the Fish Markets. Whilst on paper the Anzac Bridge can be walked or cycled, in reality it is noisy and the access on to the bridge requires a serious level of fitness.

- The Glebe Is Bridge would also vastly increase access to the new metro stop.

Objective 4: Provide a diverse range of land and water-based uses that are complementary to the new fish market and drive Blackwattle Bay's contribution to the Innovation Corridor and global Sydney

- Again, the Glebe Island Bridge should have been part of this proposal as that would provide the 'missing link' in the Innovation Corridor.

Objective 6: Deliver housing affordability and diversity consistent with government policy – Towards our Greater Sydney 2056 and the Eastern City District Plan

- Far too little of the housing is affordable

- The sheer scale of the housing is not conducive to strong social network. Further, close proximity of the freeway on to the Anzac Bridge means that balconies will be unpleasant to use as outdoor space.

Objective 8: Provide social infrastructure including recreation and open space to support the overall population needs

- The amount of new open space is not commensurate with the proposed number of new occupants. The current space is already under pressure with the existing residents.

I note the following **errors** in the document 'State Significant Precinct Study'

• page 24: The trees on Bridge Road have been removed. It is not clear when/if they will be replaced.

• page 28: The 370 bus. Under proposed changes to eastern suburb buses the 370 will only go from Leichhardt to The University of Sydney, and not to Coogee.

Karin Kolbe
20/Aug/2021

179661

Lagerlow

2037

Please see my submission attached.

Submission on Proposed Development at the Sydney Fish Market Site

18th August 2021

I am very concerned about the proposed development. It is of a size and scale that is totally inappropriate for a waterside location. It divides the local community from the water and the standard of housing is not appropriate for a location so close to the western Distributor.

There is little sunlit green space and there is a lack of affordable housing as a proportion of the total. The foreshore promenade narrows to a width of only 10 metres which is grossly insufficient for what will be a busy thoroughfare used by joggers, walkers and bicyclists and the continued use of Blackwattle Bay by rowers is not assured.

I find the use of the State Significant development unnecessary and consider it a tactic to bypass legitimate concerns of the local community as represented by the local council.

Please give more consideration to the livability of our precious city for those who will inhabit it well into the future.

Yours Sincerely,
John Lagerlow

183071

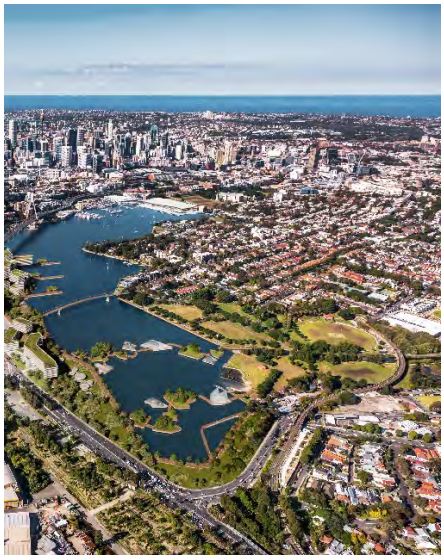
Lawlor

Sydney 2000

Please refer attached document

architectus™

1 Vision



Charrette 2021 © Architectus

The Blackwattle Bay State Significant Precinct (SSP) Study currently open for feedback provides welcome guidance for a critical part of Greater Sydney's ongoing evolution. The foundation for the development outcomes embraces place-based approaches, in its response to Country, community resilience, local economic development, as well as urban design and cultural heritage.

This year, Architectus used Bays West as the subject of its annual 3-day design charrette and considered the proposals for Blackwattle Bay as one of the key inputs for this exercise. The emerging themes of Listening to Country, Resilient City and Innovation are reflective of the opportunities expressed in the Blackwattle Bay SSP, and I have used some of these illustrations here to suggest possible solutions.

We congratulate the NSW Government and INSW for the leadership in areas such as local economic development, environmentally sustainable development, and community resilience expressed in the SSP Study, as well as the suite of technical documents sitting behind it, and we look forward to discussing our submission in more detail in further stages.

2 Intended Effects

While there are a number of constraints and challenges associated with this precinct, the vision for reconnecting the harbour, its surrounding neighbourhoods and the city; showcasing Sydney's living culture and stories of Country; and building an inclusive and iconic waterfront destination that celebrates innovation, diversity and community; is an exciting one.

2.1 Land use zones

A vibrant mixed-use precinct, with the significant Sydney Fish Market as a local and visitor anchor, as well as great public connectivity to the foreshore, will deliver a great outcome for the community.

For successful mixed-use precincts, approximately one third residential and one third commercial, with the balance given over to public, open space, and cultural uses, is generally the broad formula of uses that leads to vibrancy and community "stickiness". It is positive to see that a 50-50 split between residential and non-residential uses is proposed. How this is delivered over time, preferably equitably across the sites, is critical to maintaining public trust and the "licence to operate."

2.2 Maximum height and floor space

We support a balanced approach to heights and there is an argument to be made for anticipating future heights on adjoining areas of Pyrmont. The government owned sites are doing the heavy lifting in terms of gross floor area, in particular the sites adjoining the Western Distributor. The design treatment will have to be handled carefully given this hard edge, as well as the medium rise residential to the south across Pyrmont Bridge Road.

2.3 Site specific provision

These provisions are a beneficial addition to the existing suite of controls, in particular the codification of design quality, sustainability and affordable housing.

2.4 Design code

Mandating design quality is critical on key sites like Blackwattle Bay that complete the harbour foreshore experience. Strengthening the provisions that will distinguish the precinct and better reflect local character and morphology would be welcomed.

2.5 Design excellence

Design excellence and a commitment to social and environmental resilience coordinated across the sites, and across development stages, will be best managed through a dedicated governance arrangement. This will provide long term certainty and consistency not only for the local community and economy, but also for the market.

It is critical that the recent lessons of resilience are built into high-density residential controls. These should emphasise access to greenery, privacy, and flexibility of residential spaces – design for community that provides shared spaces to meet neighbours and build cohesion, and well design private spaces suitable for sheltering in place.

2.6 Foreshore area

The shoreline of Sydney Harbour is characterised by its accessibility and punctuated by parklands that are typically located either at the heads of bays or on their headlands. This public realm typology not only allows communities to relate to the foreshore, but also performs critical environmental functions, controlling run off, and maintaining biodiversity and vegetation corridors. Connectivity of the foreshore, particularly in concert with shoreline/shallows restoration, will not only showcase a magnificent natural asset, but also provide opportunities for sea-level control, active transport connectivity, community recreation, regenerate habitats, and meet designing with Country aspirations.

2.7 Infrastructure funding and delivery

To ensure the opportunities for Blackwattle Bay achieve the economic and social returns over time, a precinct governance structure should be created that takes responsibility for precinct master planning, and whole-of-precinct sustainable infrastructure and procurement structures that are then applied to each development site.

The opportunity for district-wide sustainability initiatives such as sea level management, regenerative design, power, waste and water, as well as the required community building and engagement, necessitates a single point of authority with oversite for the cohesion of the whole. This should not be left up to developers to interpret. In addition, social and economic activation requires strong local “software” that needs managing and nurturing through the early life of the precinct, as well as the equitable provision of essential infrastructure, such as digital.

The potential for active transport, so close to the Eastern Harbour City CBD, and linking in with future metro and bus interchange seems a no brainer – until we encounter the Glebe Island Bridge. This important heritage asset can be re-activated to provide an authentic experience that has all but been erased from our understanding of the harbour.

In our Bays West charrette, we proposed an additional pedestrian/cycle bridge from the east end of Glebe Island to the west side of White Bay which would make the precinct more connected to Balmain. We also added a bridge connection from the proposed new White Bay metro station, under the Pyrmont Bridge, and through Rozelle Bay, to Glebe Point Road. This would link active transport routes directly to either end of the precinct and create new catchments for the Sydney Fish Market.

Rozelle Bay floating bridges and New Glebe Point Road Bridge, Charrette 2021 © Architectus

2.8 Affordable Housing

Recent events have highlighted that essential and key workers that keep the city, and the state, functioning have been priced out of inner urban areas. The additional provision in the SPP Study over

and above the LEP is beneficial – and we must ensure that it includes a mandatory minimum provision in the precinct, not just a financial contribution. Housing affordability is critical to social cohesion, worker wellbeing, aging in place, and community resilience.

2.9 Car parking

Reducing the amount of car parking and setting the example for other precincts will be beneficial, balancing the needs of people who have mobility or equity of access issues and for whom public or active transport is not an option. In households with low car ownership there also tends to be lack of funds for long public transport trips, especially for leisure. We need to encourage precinct visitation from across Greater Sydney and the regions.

2.10 Sustainable development

There needs to be incentives for developers to adopt sustainable, low carbon, approaches outlined in the SPP Study, to aspire beyond the minimum standards outlined.

In particular the governance outlined above will be required in order to implement initiatives that need a whole-of-precinct approach, especially around energy, water and waste.

2.11 Heritage and culture

In order to take a leadership position in listening to and design for Country, and recognising the value of aboriginal cultural knowledge, early and often engagement with first nations people will ensure that the precinct development forms an appropriate response to Country, more than a “tick the box” exercise.

3 Conclusion

Blackwattle Bay redevelopment will transform how the Pyrmont Peninsula and Glebe can be accessed and appreciated. The relocation of Sydney Fish Market will provide a great attractor for visitation, as well as supporting allied businesses.

We are confident, as an industry, we can provide implementation solutions over time that meet the expectations represented in the Blackwattle Bay SPP Study. We look forward to discussing our ideas in further detail over the course of your consultation.

Charrette 2021 © Architectus

Written by:

Alex Lawlor

20 August 2021

Architectus Sydney

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182856

Livings

Marrickville 2204

Please refer to the attached PDF for details of my submission

DG07, 359 Illawarra Road,
Marrickville NSW 2204

20 August 2021

RE: BLACK WATTLE BAY SSP STUDY

To whom it may concern,

I would like to voice my object to the State Significant Precinct Plan for Blackwattle Bay in its current form.

It is evident that the proposal seeks to prioritise development/ maximise profits (it is even stated in the SSP Study as justification to reduce the waterfront promenade to 10m in some sections), and any amenity provided to the public is secondary. People should be prioritised for development on public land.

Height

The overall height of the proposed development is vastly too great. The SPPS notes that the scale *"forms a component of a wider urban skyline comprised of varying architectural styles and scales, and does not appear at odds with the wider skyline which helps to mitigate the scale of the precinct"*, however this statement is not true. The scale of the proposed towers is imposing and inconsistent with the scale and character of the surrounding Glebe/ Pyrmont areas. The precinct is removed enough from the CBD that the height of this proposal will stand out quite significantly and overpower the existing fabric. The proposed height of the buildings will impact negatively on the precinct as well as the surrounding areas

Shadow	Shadow diagrams have been provided for 9am, 12pm and 3pm, however for a proposal of this significance shadow diagrams should be provided at half hourly intervals between 9am and 3pm on June 21
Wind	The SSPS highlights that the proposed form will have excessive impact in terms of wind. Treating the building architecturally is not adequate, wind impacts should be addressed as part of the master planning envelope. Further the impacts of wind on trees has not been adequately addressed.

Aboriginal Heritage

Two sites have been identified as potentially containing Aboriginal Heritage (PAD01 & PAD02), yet the master plan ignores these sites and assumes development.

The masterplan should address the aboriginal heritage of the area in a deeper way, including in the formation and structure of the promenade.

Shared movement

The proposal speaks of providing a cyclist and pedestrian friendly environment however does not adequately address the connection of the precinct to the surrounding area for pedestrians and cyclists. Interventions are proposed to intersections to streamline car movement, this same approach should be made to the connection streets in terms of bicycle and pedestrian movement, and priority should

be given to these connections over car movement. Currently the cycle commute along Bridge Road is problematic and dangerous, the proposed development will increase the number of vehicles in the area quite significantly. The Government should be heading the lessons learned by other cities and discouraging vehicle trips to and around the area and prioritising foot and bicycle traffic over cars. At the very least a dedicated cycle path should be provided along Bridge Road to connect Glebe and Pyrmont.

Affordable housing

NSW is currently in the grip of an affordable housing crises. The figure of 5% floor area for affordable housing is vastly in adequate, this figure should be closer to 25%.

Biodiversity & Tree canopy

Trees and biodiversity appear as an afterthought in the SSPS.

The SSP states that a BAM cannot be prepared until a DA is lodged. This is ridiculous, a BAM should have been prepared as part of the SSP. The SSP does not adequately address how biodiversity will be encouraged as part of the proposal.

The accompanying tree study notes exceptionally difficult conditions for new trees, and limits the number of species that could suit the proposal quite significantly. Tree canopy should be given a much higher priority in the masterplan, given that trees are crucial to maintaining liveable cities in particular in an uncertain future dominated by climate change. The proposed built form should be adjusted (reduced) to minmise wind and shadow impacts on the site.

The trees in Wentworth Park should be also included in the study to understand any impacts the development will have on them.

The proposal prioritises development but should be prioritising people.

Yours sincerely,

Darren Livings,

Architect NSW 11116

182626

LOCKLEY

Sydney

See attached file.

This submission particularly addresses the financial aspects of the project. These have not been made public, and do not feature in the consultation publicity issued with this call for input.

In brief, the public is entitled to know, in in simple terms, the balance between the public and private sectors of this project in terms of investment and benefits.

Three issues are touched on: The financing of the new fish market, the selection of this particular development scheme, and wider economic and social issues.

1. It appears that the public contribution to the relocation of the fish market is around $750 million. This is a significant amount, and we need to be assured that the public interest is being protected. Another aspect to be considered is the degree to which the project is being financed by what is essentially a degradation of the local community as is set out in the later sections.

   This need for transparency is underlined by recent revelations of the (lack of) public process by which the Crown Casino site was transferred to the Packer organisation, and reports of improper processes in other areas, for example those involving Daryl Maguire. There are many other reasons for concern: one I am particularly familiar with is this government's total irresponsibility about the proposed improvement of cultural facilities in western Sydney by means of 'moving' the Powerhouse Museum to Parramatta. Hundreds of millions of dollars are being disposed of without proper process.

   Details of the public land to be used for this development are not clear. It seems that the site B2 and B3 (Glebe foreshore) will be taken up by the new fish market building. there will be some degradation to the amenity of park and recreational facilities adjoining the fish markets. This should be clarified.

   Major development will occur on crown land presently accommodating Sydney Fish Market Pty Ltd on a long term lease basis. A common comment among business people is that this whole deal seems to be about developers grabbing crown land for residential development. We need assurance that the financial recompense to the people who own this crown land is indeed appropriate.

   The three major private landholders and others will be making a huge windfall profit. We need to be assured that all the entities who are making large amounts of money from this developmental process be making an appropriate contribution. Many of the residential owners of the developments that have occurred over the last three decades have assumed, with good reason, that these modern developments have been properly planned. These people purchased their existing dwellings without realising their view and access to sunlight would be affected by construction of 26 (or more) storey buildings along the very waterfront. They also deserve compensation.

   One would hope the desirability and fairness of restricting low height buildings for harbour water frontage would by now, be clearly apparent.

2. This development appears have been determined without proper investigation of alternatives. It has been declared a state significant development and yet, present governmental processes seem to indicate such developments do not need public scrutiny! This is a denial of democratic process. The government must demonstrate through due process this does represent the best possible use of public money. Other deverlopmental proposals have been made over recent years, some involving no significant expenditure of

public money However, there was no debate about the alternatives: this plan was simply handed down from on high, and this current consultation is largely a formality.

3. The public needs to be assured that the wider implications of the project have been understood and that proactive action is being taken, and the cost of this action.

   This would include such matters as:

   a. Provision for services such as education for an increased population: there are concerns that even the ecently completed Ultimo Public School will be adequate.

   b. Provision for, or assessment of the macroeconomic cost of, increased traffic congestion within the area It is noted the parking area proposed for the new fish market is essentially the same size as the existing parking area, which is inadequate at normal terms and goes nowhere near meeting needs in peak periods. This problem will be greatly exacerbated by the 3,000,000 additional annual visitors that are forecast. Essentially, this doubles the traffic to and from the fish market. Add additional population from new residential towers and their cars will further increase traffic congestion. At fish market peak hours, we have already experienced extraordinary delays in travelling from our home via the Anzac Bridge or Western Distributor.

   c. Improvements to public transport will be required. Despite the vastly increased visitor traffic, it appears that there will be no change to the light rail and that bus facilities, eg for tour groups, has been ignored.

It is apparent that various private interests stand to gain huge from rezoning and construction of tall residential towers. Smaller developments would still provide large profits and be so much fairer for existing residents. All these matters could be clarified by providing a simple summary of the overall financial plan, including dealing with the issues raised in section 3, so that the public would have the facts upon which proper assessment could be made..

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Louden

2009

Please review and take into consideration Pyrmont Actions submission

PYRMONTACTION

Elizabeth Elenius, Convenor,
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PYRMONT NSW 2009
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20 August, 2021

Submission on Blackwattle Bay State Significant Precinct Study

ABOUT PYRMONT ACTION INC

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

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

STATEMENT OF OBJECTION

At our meeting on 12 August, 2021, members provided feedback on the draft submission. It is our strong and unanimous view that the built forms presented will not only destroy the visual and solar amenity of much of Pyrmont, but they are the antithesis of the high quality of the architecture of the new Sydney Fish Markets which we laud as comparable with that of the Sydney Opera House. The towers and podiums should be replaced with buildings which sit comfortably with the building forms in the vicinity, should be set back from the waterfront, and be reduced in scale such that a green public park can be provided between the development and the new SFM. Views from existing residential developments should not be compromised and public benefit in the form of public open space and parkland should be given priority over the privatization of this publicly owned asset.

BLACKWATTLE BAY CONSULTATION

The earliest consultation on future development occurred in the context of the development and approval of Master Plans for Rozelle and Blackwattle Bays, and for Bank Street, including the sites now included in this Precinct Study. Many of the planning principles underpinning these Master Plans which were generally supported by the local communities of Glebe, Rozelle, Annandale and Pyrmont, informed the work of the original Bays Precinct CRG (reporting to the Government via SHFA) established in 2010. Pyrmont Action was represented on the original Bays Precinct CRG whose membership included representatives from the Pyrmont, Glebe, Rozelle, White Bay and Balmain communities, representatives from key Government departments and agencies and from the City of Sydney and Leichhardt Council. They produced and presented an agreed report to Government entitled *Towards an Integrated Strategic Plan: Bays Precinct* in March 2010.

The election of the Coalition Government in 2012 saw the cancellation of all Master Plans associated with Blackwattle and Rozelle Bays, and the establishment of a new entity, Urban Growth NSW, tasked with the development of a Bays Precinct Plan. Following a range of public exhibitions and events, including the Bays Precinct International Summit 2014 and meetings of a new version of the Bays Precinct CRG, Urban Growth released the *Bays Precinct Sydney Transformation Plan* in October, 2015. This new Bays Precinct CRG, comprising a membership of any member of the community who wished to participate, was formed to provide input to the development of the Plan. Unlike the earlier CRG it did not include representatives from local business, local government, government departments and agencies and it proved incapable of providing meaningful input. The consultation certainly did not meet many of the 2010 CRG recommendations, objectives and principles, let alone Principle 4 of the *Transformation Plan* ie "Allow the time to invest in genuine and early engagement with, and broad acceptance of the government's plans from all categories of the public, government and industry." (pp13-14).

When Urban Growth was disbanded, planning for the Bays transferred to Infrastructure NSW (INSW) reporting to the Premier. The CRG continued but community membership was determined by application, thus its numbers were reduced. It met several times, basically to receive briefings, rather than engage meaningfully. Members also attended two workshops in 2019 (one on how to ensure meaningful acknowledgement of First Nations' story and culture in the Plan; the other to examine inclusion of Cultural elements).

The next engagement was the release of the 3 scenarios for comment in May 2020. There had been absolutely no contact between INSW and members of the CRG for many months and we were shocked when asked to chose between 3 scenarios, in which the building forms presented were largely the same, dominated by 45-storey towers above podiums – a concept which had never been shared or explored with CRG members. The feedback reported in *Revitalising Blackwattle Bay* (May 2020) clearly rejected the building heights presented. "Buildings over 35 storeys were not generally regarded as being appropriate for a harbourside location" (p4) was an understatement of the views expressed by community members who also deplored the lack of a "none of the above" option in the scenario questionnaire. The analysis of feedback by stakeholder groups demonstrated that "Community members, including residents, community groups and businesses, suggested buildings with lower heights to integrate better with the existing built form of Pyrmont and Glebe and encourage solar access...." (p4)

But these views were ignored as by then the Department of Planning, Industry and Environment (DPIE) had been required to incorporate the scenario building forms with heights up to 45-storeys within the Pyrmont Peninsula Place Strategy (PPPS) as a Key Site within the Blackwattle Bay Sub-Precinct, and the PPPS has been approved by a Government determined to "revitalize" an already vital Pyrmont Peninsula into an extension of the CBD. We ask, why has the Government spent huge amounts of public money, and induced unpaid volunteers who care about their communities to devote countless hours in a "consultation", the outcome of which has been ignored?

> *Recommendation 1 - The Minister for Planning, Industry & Environment to require DPIE to review INSW's proposals for Blackwattle Bay, and "allow the time to invest in genuine further consultation" with the community and the City of Sydney in order to meet their expectations of "urban renewal that respects the industrial heritage and architectural scale of Pyrmont without overshadowing the surrounding area" (p4 Revitalising Blackwattle Bay).*

"SIMPLIFYING" THE PLANNING FRAMEWORK

We deplore the proposals outlined in Attachment 10 – Explanation of Intended Effect - aimed at providing a "simplified planning framework that is easier to understand and navigate..." (p5). Not only

will it exempt plans for the public domain from all current assessment requirements, but, if the Government proposals to amend the Environmental Planning and Assessment Act are passed by Parliament, it will hand to the Government "unfettered powers to implement other reforms without parliamentary scrutiny" (*Government News* article, "Minister vows to press ahead with infrastructure contribution changes" 19/7/21 p2).

The consequences of handing powers to private certifiers, and reducing the period for stratas to identify serious building defects from 7 to 2 years, have been on full show during the period in which the Government has progressively "simplified" and privatized the planning approval system and cut "red tape". The morphing of Part 3A developments into "State Significant" developments has sidelined both local governments and communities in the Government's push to transform and simplify the planning system. Barangaroo and Darling Harbour are prime examples of the consequences of such unfettered powers being handed to the Government through removal of independent checks and balances resulting in loss of public and private amenity.

Our experience of participating in "consultation" associated with Darling Harbour, leads us to strongly oppose the use of the State Significant instrument in the planning and delivery of Blackwattle Bay developments. The latest iteration walls off Pyrmont from the CBD, reduces public foreshore areas to a 20m strip, incorporates huge towers which overshadow the public and private domain, including the harbour, and privatizes what was intended to be a public asset. All community attempts to mitigate the worst impacts via "tick-a-box consultation" were met by Lend Lease, the developer, with the riposte that our proposals "were not in our design brief". This "brief" was developed by INSW with little or no public input. The amendments to planning instruments proposed in the BBPPSP will, almost certainly, deliver a similar outcome on the Western foreshore of the Pyrmont Peninsula – gross overdevelopment.

Our experience in genuine community consultation in the development of Master Plans for Blackwattle/Rozelle Bays, Bank Street and Jacksons Landing in Pyrmont, has given us insights into the importance and weight such plans provide in the roll-out of developments. The Master Plan provides certainty to potential purchasers and a baseline beyond which developers should not stray, unlike what has happened at Barangaroo, and opportunities for genuine community input.

We note that SREP26 "requires the preparation of a Master Plan for the site at Blackwattle Bay" (BBSSPS p50) which is to address a number of issues including building envelopes and built forms, provision of public facilities and open space. However, we also note that SREP 26, and its predecessor SREP 25 specifically deal with protection and enhancement of views and the scenic quality of foreshores and waterways. There is no mention of such requirements in the changes outlined in a letter from DPIE to property owners in Pyrmont (6/7/21). We object strongly to the proposal to amend the *Sydney Local Environment Plan 2012* to allow the maximum building height up to RL 156 and other measures. The BBSSPS also seeks to remove the requirement to prepare a Development Control Plan (DCP) when proposed developments increase gross floor area, in particular for buildings greater than 55m above existing ground level or a development on a site area of greater than 5,000 sq.m. These measures are opposed not only by members of the local community, but by the City of Sydney. Any changes to Sydney LEP should require the agreement of the City of Sydney based on wide consultation with the local communities affected. This has been the process in the past.

The BBSSPS (p51) indicates that instead of meeting the requirements of SREP 26, INSW will, instead prepare a concept DA in respect of that land under the provisions of Section 4.23 of the *Environmental Planning and Assessment Act 1979*, as was done in the case of the new Sydney Fish Markets (SFM). In the latter case both the concept DA and the DA proper were put on exhibition simultaneously, thus any issues normally identified at the concept stage were unable to be addressed, including by the IPCN, in the event of receipt of over 50 objections. We fail to understand why the Blackwattle Bay SSP should be treated differently from other Key Sites and urge the preparation of a concept Master Plan for

assessment, including community consultation, before proceeding to the development of a Master Plan the assessment of which should require genuine community input before final determination.

> *Recommendation 2 – The Blackwattle Bay Key Site planning framework should involve preparation of a Master Plan requiring genuine community participation and agreement of the* ***City of Sydney; we reject the Site's State Significant declaration and amendments to the Sydney*** *LEP to permit a maximum building height of RL 156; we seek compliance with SREP 26 provisions to ensure that developments protect and enhance views and the scenic quality of foreshores and waterways.*

We are particularly concerned to ensure that developer contributions are allocated to meet the social and physical infrastructure needs of the local community and not be allocated beyond the boundaries of the Pyrmont Peninsula as defined in the PPPS. We are alarmed that the planned changes to the EPA Act, currently the subject of a Legislate Council review, "replaces special infrastructure contributions with a broad-based pooled regional contributions system... and enables developers to defer payments until after construction" (*Government News* 17/721 p2). Furthermore, it is apparent that there is no firm commitment to deliver the required infrastructure (as yet undetermined) before construction of the residential and commercial buildings, with only a vague statement (Attachment 10, p10) "that investigations regarding infrastructure needs, costs, staging, sequencing, delivery partners and mechanisms are underway....".

Having sought clarification of measures outlined in Attachment 10 from both INSW and the City of Sydney, we understand that there are two classes of infrastructure – State infrastructure, and local infrastructure. It appears that "the Planning Secretary's role is to determine whether satisfactory arrangements are in place for the adequate provision of State infrastructure before any development is approved" (INSW 28/7/21. We would place within the definition of State infrastructure provision of accessible School infrastructure to meet both current needs, and the needs of the 8,500 new residents moving to new homes within the Pyrmont Peninsula, also provision of roads within the Precinct. We are advised by INSW that "provision of public infrastructure works in the public domain at Blackwattle Bay by a government agency or the council would similarly be carried out without the need for development consent" (28/7/21). We strongly oppose this exemption as it removes the voice of the community from decisions as to what, where and when infrastructure will be provided.

> *Recommendation 3 – The BBSSPS provisions must ensure that all developer contributions raised through BB developments are allocated to projects that benefit Pyrmont Peninsula communities and not undermine or offset the funding and delivery of local contributions and infrastructure under the relevant contributions plan. The community must be consulted before any plan for the distribution of contributions is finalized and the agreed (with the City of Sydney and the Pyrmont/Ultimo communities) infrastructure delivered prior to the construction of residential and commercial buildings.*

ECONOMIC RATIONALE

Noting that only 40% of respondents to the survey on the Directions to Inform the development of the PPPS, considered Direction 1 – Jobs and Industries of the Future – as their top priority, once again this BBSSPS ignores community input (with 63% placing Direction 2 – Development that complements and enhances the Area as its top priority) and places as the Government's top priority its desire to make as large a profit as it can from the privatization and sale of public land to large developers.

And are the economic projections reliable? We note that the Minister for Planning, Industry and Environment has stated *vis a vis* Covid 19 that "there will be more pressure to decentralize from the main CBD to smaller centres across the city". He also expects demand for apartments to be "patchy" and

believes "the CBD would struggle while suburban centres would benefit from people working from home". A survey of large businesses conducted by the *Sydney Morning Herald* (12/7/21 pp 1 and 6) reported "the flexible work revolution is set to be one of the most enduring legacies of the coronavirus pandemic, with the potential to reshape Australia's workplaces." Additionally, there is no knowing future trends of Chinese investment in real estate, Chinese tourism and overseas student demand for accommodation, given the worsening relationship between Australia and China, irrespective of the impacts of the pandemic.

> *Recommendation 4 – INSW should engage independent consultants to prepare projections of demand for housing and commercial space taking into account the long-term impacts of the Covid pandemic and the worsening relationship between Australia and China.*

Further, we object to the inequity of Pyrmont having to pay the price of the Sydney Fish Market development which is a beneficial resource for the whole of Sydney. The SFM provides quality assurance and food safety processes for wholesale and retail sale of seafood throughout Sydney and the State. They are much more than a local retailer and will attract many visitors to their cafes/restaurants, thus boosting the coffers of the tourism industry, and the State. We don't object to the Government recovering some of the cost of the SFM's construction by selling land vacated for appropriate commercial/residential development. But we have very real concerns that the proposed development quite dramatically reduces the amenity and value of many residential properties, as well as views from public vantage points, including from Glebe. Reducing the building height and size and spreading the cost across the broader beneficiaries of the SFM development will address many of our objections while adding a precinct that meets the overall objectives of INSW (including "user pays"). It may even reduce the need for a detailed and arguable business case for the adoption of this Strategy.

> *Recommendation 5 – The cost of construction of the new SFM should be shared between the Government and industries benefitting from the development, enabling a reduction in the height and scale of the proposed Blackwattle Bay Precinct developments.*

<u>BUILDING HEIGHT AND FORM</u>

From a community perspective, the most egregious flaw in the BBSSPS is its presentation of the built form as a wall of buildings, relatively close to the foreshore, with towers reaching up to 45-storeys, more than double the height of existing apartment buildings in Pyrmont. A shadow diagram (p111 revised), clearly depicts residences in the Wattle Crescent precinct and in Bulwara Road and Jones Street up to Fig Street in shadow for all but around 2 hours per day in midwinter. Two additional diagrams – 9am-3pm in midsummer and at the Equinoxes - were provided indicating shadowing over public areas in the BB Precinct in the early morning, with evening shadowing (not shown) likely over residential precincts South East of the Precinct. The Heat Map (p112) indicates the areas which will be largely free of shading ("50% solar access for 4 or more hours) and those "more solar restrained" (p111). It is clear that most public areas will be shaded to some degree in midwinter. Whilst this is permitted by the various planning instruments governing new developments, it is quite clearly contrary to Direction 2 – "Development that complements or enhances the area" – in the PPPS (p25). This Direction refers to the "character and charm of surrounding buildings and public domain" and states that "Any changes in building forms and public domain must be sympathetic to, or enhance, that character".

The *Visual Impact Analysis* Attachment 15 (p117) reports the findings from consideration of the visual impact of the proposed developments on 20 viewpoints in public spaces. Of those, 3 have a moderate rating, 6 have a high/moderate rating and 3 viewpoints have a high rating. The consultants recommend measures to mitigate these impacts and conclude, on the proviso that they will be implemented, that the impacts "are such that they would not constitute reasons to hinder approval on these grounds". They do acknowledge that perception of impacts is subjective and will differ from

person to person. Having viewed the photomontages presented in the analysis, we conclude that from a number of vantage points including: Knoll Park, Jones St Cliff Top Walk, Cnr Harris/Miller Sts, Wattle St/Cresc, Gipps St, Jones/Miller St, the currently open and distant views will be completely dominated by these looming structures – and this doesn't take account of the loss of views and light currently enjoyed by thousands of residents who live adjacent to these public sites.

The BBSSPS (p38), in addressing the PPPS 10 Directions, claims that the Plan outlines built form that is sensitive to the existing neighbourhood context. "...tower forms are positioned to deliver solar amenity for new and existing open spaces". There has been no analysis of the impact on apartment buildings to the SE of the Precinct. Residents living in three large residential buildings – the Paragon and Mirage buildings in Pyrmont Street, and the Bulwara Road apartments – will lose their existing views and sunlight as well as the value of their homes.

Whilst the BBSSPS will certainly "add a noteworthy new level of built form to the visual scene" as claimed in the Visual Impact Analysis, this impact will be "noteworthy" for all the wrong reasons. The Pyrmont Peninsula Eastern edge is already walled in from the CBD by the Darling Harbour developments and will be similarly walled in by high rise buildings on its Western edge with towers endeavouring to compete with those in the CBD, with no reference to the low to medium rise form of heritage and modern terraces and heritage wool store buildings which lie in between.

We are also concerned about the health impacts on residents who move into the residential towers which will be constructed very close to the multi-lane Western Distributor and Anzac Bridge. Noise will reduce residential amenity and even if electric vehicles reduce toxic emissions, airborne particles from tyres will generate pollution, especially if the substantially increased traffic volumes forecast in the *Blackwattle Bay Precinct Plan Transport Management and Accessibility Plan* (p128 Attachment 4.1) are realized. It is also noted that the Hymix concrete batching plant located at the boundary of the current SFM site, also generates excessive noise, is unsightly and poses health risks from emissions. The BBSSPS (p71) clearly states that "they do not ever envisage the site's closure or relocation" throwing into doubt the realization of the proposed Miller St Reserve.

> *Recommendation 6 – Building heights should be reduced significantly and "complement and enhance" the existing built form, in line with the views expressed through the consultation process. We reject tall towers and bulky podiums so close to the waterfront.*

In Pyrmont, we are very familiar with the wind tunnels created at ground level by rows of tall buildings. It is sometimes hard to keep upright, let alone proceed along the footpaths. The wall of tall buildings created along the W foreshore would take the full brunt of the strongest winds primarily from the West, and create turbulence in public areas.

> *Recommendation 7 – Building height should take into account adverse wind effects generated by the proposed towers.*

PUBLIC OPEN SPACE

As mentioned above, Pyrmont Action has worked for many years with residents from nearby residential stratas, including 120 Saunders St, 2 Bowman St, 1 and 2 Distillery Drive and community groups, including dragon boaters, concerned to ensure that public open space in Pyrmont meets the needs of our community. We are therefore very concerned to read INSW's proposal to exempt public authorities charged with delivery of plans for such spaces from the normal planning assessment processes under the provisions of the EP&A Act (BBSSPS p49). We strongly oppose "the amendment of the ISEPP to include Blackwattle Bay as a public authority precinct to ensure it's an exempt development" (p97).

Recommendation 8 – Planning for Public Open Space in the Blackwattle Bay Key Site should be conducted under the provisions of the EP& A Act with the City of Sydney as the consent authority for projects under $10m and the Planning Minister for those over $10m. The community must be genuinely engaged as stakeholders from the earliest stages of planning for the public realm.

We all like the idea of being able to walk around the foreshore but foresee that concentrating public amenities and space along Blackwattle Bay will have a significant impact on the viability of small businesses in the Pyrmont Village Sub-Precinct including Union Square and Harris Street. Even pre-pandemic Pyrmont has become a place to walk/cycle around, or through, rather than represent a destination in which to stop and browse. High CBD rentals are seeing more and more "For Lease" signs in front of closed premises, including those previously accommodating Bendigo Bank and the Commonwealth Bank in Union Square. In planning uses for buildings lining the foreshore, consideration should be given to providing contributions to public infrastructure located within Pyrmont Village to encourage visitors to explore this precinct, rather than in duplicating public amenities at Blackwattle Bay. Such infrastructure is already centrally located but requires substantial upgrades/redevelopment. INSW and DPIE planners must not plan each Sub-Precinct/Key Site in isolation from the whole Peninsula. Measures to entice visitors to Pyrmont Village include: improved street lighting and signage, noting that at present most signs point away from this precinct ie to "Parking", "Darling Harbour" and the "Fish Markets", with no "Welcome to Pyrmont" signs in sight.

Recommendation 9 – Ensure that BB Key Site developments do not further reduce the economic viability of small businesses located in Pyrmont Village by requiring funding to be directed to provision of centrally located regional community infrastructure eg the Maybanke Sports and Recreation Centre (PPPS p75), improved lighting and signage.

The Pyrmont Peninsula remains very short of green public open space in which people can congregate, recreate, play and exercise. The small Miller Street Reserve or the small "parks" in front of the podiums will do little to address the current shortfall in useful public recreation spaces. The only site identified for such a park is at the Northern end of the precinct in Bank Street.

Recommendation 10 – Significantly expand the provision of green public recreation areas along the foreshore by reducing the building footprints of all proposed new developments.

We were part of the team which developed a Great Idea for the Bank Street Public Recreation Area (Attachment 1) and make the following suggestions for the site's future use, noting that it is recognized in the BBSSPS that the newly constructed Blackwattle Bay Marina at 3-5 Bank Street is only approved as a temporary structure for 5 years. NB the Great Idea images include what was, at the time, the approved plan for a museum and workshop for the Sydney Heritage Fleet, subsequently modified by RMS and approved as the Blackwattle Bay Marina (now to be relocated):

1-3 Bank Street – Whilst the existing structure (or part thereof) housed the original Fish Markets, we do not consider it has either heritage or architectural merit. We recognize that it could be re-purposed, with removal of asbestos and a major refurbishment, but if it is decided, following consultation with potential users such as the dragon boat clubs and the local community, that it should be demolished and a new facility constructed, we would support that as an option. We envisage it could be used to provide toilet and change room facilities for the passive boaters; affordable artists' studios and gallery; a public marina office; and a café/bar/restaurant to serve both the local community and visitors traversing the proposed foreshore promenade. We also recommend provision of appropriate berthing adjacent this site for the Tribal Warrior.

Bank Street Park– We are delighted that it is proposed to relocate the temporary commercial marina, currently leased to All Occasion Cruises, to the South of the BB Precinct, noting that it

was only approved as a temporary facility for five years on the Bank St site. However, we suggest that the already constructed new paths to the waterfront associated with the temporary marina could be retained to link with the proposed foreshore promenade. We strongly oppose the construction of a wide promenade cutting diagonally through the proposed parkland as is depicted on the front of the *Guide to the Blackwattle Bay State Significant Precinct Study,* as it would render the park unsuitable for informal active recreation such as soccer, as is the case with the nearby Pirrama Park. We do, however, acknowledge the suggested depiction of the former shoreline and this can be achieved by a thin strip of metal or other substance built into the surface of the lawn as has been done in Refinery Park off Bowman Street.

Recommendation 11 **–** *Support the re-use or demolition and redevelopment of the buildings on 1 – 3 Bank Street for community, boating and cultural uses, including a café/bar/restaurant to serve both the community and visitors. Support the re-location of the temporary marina to the Southern section of the Precinct. The design for the proposed park at Bank Street, from the earliest stage of planning, should be developed in partnership with community and stakeholders.*

Proposed Foreshore Promenade – We note that the width of the promenade varies from 30m width to just 10m width along a significant portion of the path in front of the buildings proposed on the privately-owned sites in Bank St. Our experience with the popular pathway along the Glebe foreshore is that 10m is not wide enough to accommodate safely cyclists, joggers, pedestrians, and parents with strollers. With the increase in active transport likely to be attracted to the foreshore path, the narrow section is likely to be quite hazardous, especially as some of the forms of transport such as powered scooters can travel at speed. Options which could be explored to expand this strip include:

- Expand the footpath beneath a building overhang to a total of 30m in width. This may not be viable given that any cafes/restaurants at ground level, are likely to expand their tables and chairs to the footpath; and the probability of adverse wind effects at ground level together with the certainty of shading for much of the day.
- Construct part of the walkway over the water. This may serve to separate the pedestrians from the other forms of active transport.
- Decrease the size of the buildings to accommodate a 30m wide footpath and exclude footpath dining

Recommendation 12 **–** *The foreshore promenade should be 30m wide along its total length from Urban Park near the new SFM to the path serving the temporary marina*.

Materials and Planting – Wherever possible, the use of concrete and hard surfaces should be avoided in public places, for aesthetic and water management reasons. Parks and reserves should be green and natural, rather than architectural in design to aid absorption of water. Local native plants should be incorporated in the designs, aided by reference to *Galumban Gabami: Connecting with Country Framework for Tjerruing Blackwattle Bay (March 2021)*, and with input from Pyrmont Ultimo Landcare Inc volunteers.

Recommendation 13 **–** *Parks and reserves to be green and natural and hard surfaces avoided in public areas where possible.*

Safety and Security – Over the past few years we have assisted residents whose amenity has been seriously compromised by poor behaviour of patrons attending Doltone House function centres. Anti-social behaviour involves double and illegal parking, causing traffic to travel in the

oncoming traffic lane; loud yelling, drunkenness and tooting of car horns while waiting for transport late at night. Recently DPIE approved this venue operator to self-manage his venues which he has proven unable to do since the first venue opened ~15 years ago. In addition, residents living adjacent to The Star, suffer noise and traffic congestion and pollution, as well as anti-social behaviour associated with this 24-hour venue. Violent incidents also occurred recently in Pirrama Park involving passengers from party boats after disembarkation, requiring police attendance.

In March, we were involved in a number of consultations, including a community meeting, with police from the Local Area Command. Among other measures, including increased police presence, the police recommended the installation of external CCTV cameras as a deterrent, and enabling improved investigation of bad/criminal behaviour. They also raised the issue of the need for improved lighting around these venues and elsewhere in the Pyrmont Peninsula, including parks. As the Blackwattle Bay precinct will attract late night venues, and party boat operations, we urge the strategic placement of lights and CCTV in public spaces, in consultation with both the new and existing communities, the City of Sydney and police. We would also welcome INSW and DPIE support for our request for the installation of a police station associated with the new Pyrmont Metro station.

Recommendation 14 – We urge a condition of approval of residential and commercial developments, and of open space development involve the installation of CCTV cameras and strategic lighting to ensure the safety and security of residents, workers and visitors to the BB Precinct; we ask INSW/DPIE to support the installation of a police station at the Pyrmont Metro station.

TRAFFIC AND TRANSPORT

The transport challenges identified in the *Transport Management and Accessibility Plan (TMAP)* (Attachment 4.1*)* in particular that "the road network surrounding the Study Area is congested and highly constrained" (BBSSPS p135), have led the consultants, AECOM, to propose a mode share target of walking/cycling (27%), public transport (53%) and private vehicle use (20%). To meet these targets a number of initiatives are proposed:

- Walking – We support the improvements proposed in Fig 56 (p137) and propose the construction of a tunnel linking the proposed Metro station with the Eastern platform of the Fish Markets LR station which is served by a lift to Miller Street.

- Cycling – Whilst we support most of the initiatives outlined in Fig 57 (BBSSPS p138), we strongly oppose the proposed extension of shared pedestrian/cyclist access along the Pyrmont Bridge Road footpath beyond its intersection with Bulwara Road, noting that the City of Sydney has designated the cycling path to continue along Bulwara Road to Miller Street where it meets the new Miller Street cycleway to Pyrmont Bridge via Union Street. The Pyrmont Bridge Road footpath East of Bulwara Road narrows with the corner of a building jutting out and obscuring the vision of oncoming cyclists and pedestrians, creating a safety hazard. And there is no prospect of widening Pyrmont Bridge Road to accommodate a dedicated cycleway beyond this point.

- Public Transport – We are mystified as to why bus services which travel along Glebe Point Road and go nowhere near the Blackwattle Bay precinct are included in the *TMAP* (p87) as servicing the precinct under consideration. To access bus stops for the 370, 431 and 433 services people would have to walk ~500m from the precinct to the bottom of steep stairs climbing from the Bay to the Glebe ridge, maybe with heavy shopping, if visiting the SFM. Even with the Metro,

Pyrmont is poorly served by public transport, especially in the SW corner of the Peninsula. Additionally, as Pyrmont has grown, bus service accessibility has declined with the removal of bus stops (at the bottom of Miller Street at Jones Street and near the Pyrmont Bay Ferry stop); and the removal of the (irregular) 449 service to Broadway Shopping Centre.

The TMAP (p166) proposes a public transport strategy which we strongly support. In particular we propose a regular bus service running from the Northern end of Harris St to Parramatta Road, stopping at UTS, Broadway Shopping Centre, Sydney University, RPAH then via Lyons Road to Pyrmont Bridge Road and back to Harris St via Glebe, the SFM, Bank St and Bowman Street. This would not only provide resident/worker access to Broadway, but an easily accessible link to businesses and major institutions which are part of the Innovation Corridor.

We also seek the reinstatement of the 389 bus stop near the Pyrmont Bay Ferry stop, noting that there is an unused bus shelter in Murray Street near both the ferry stop and the Pyrmont Bridge which could be brought into service to assist those who live in the south east sector of the Peninsula.

We have long sought a ferry service for the Bays Precinct and suggest that it also incorporate White Bay as part of this service.

We strongly support an increase in the number of light rail services between Dulwich Hill and Central, noting that carriages (in non-Covid affected periods) are often at full carrying capacity.

We note the proposal for Walking School Bus and Cycling School Bus (TMAP p155) but point out that the only public schools in the area – Ultimo Primary School and the Blackwattle Bay Campus of Sydney Secondary College are some distance from many parts of Pyrmont, requiring a dedicated school bus to pick up and drop off primary students. The nearest Junior Secondary Schools are at Leichhardt and Balmain, not easily accessible by public transport from Pyrmont or Ultimo. Blackwattle Bay Senior College is accessible by light rail and walking. It is noted that P/U students are excluded from the catchment of the new Inner City Secondary School more easily reached by public transport from the Peninsula than Leichhardt and Balmain.

Recommendation 15 – We support: construction of a pedestrian tunnel linking Metro platform with Fish Markets LR station; additional services on the Dulwich Hill to Central Light Rail line; a new bus service from Pyrmont via Harris St to Broadway, Parramatta Road to Sydney University, RPAH, Pyrmont Bridge Road to Glebe, Sydney Fish Markets, Bank/Bowman Street to Harris Street; reinstatement of 389 bus stops; new ferry service to Blackwattle Bay to include stop at White Bay; inclusion of Pyrmont/Ultimo students within the catchment of the new Inner City High School. We oppose extension of the cycleway in Pyrmont Bridge Road beyond its intersection with Bulwara Road.

PARKING

The BBSSPS (p139) barely addresses the challenges associated with provision of parking to serve the precinct. We note the aspirations for a reduction in private vehicle use to 20% and the already approved limit on parking at the new SFM such that this facility will only accommodate the same number of vehicles as at the current facility, despite plans for a tripling of visitors to the site. However, parking provision for businesses and residents in the new precinct is addressed in the PPPS (p67) in which it is proposed that "a multi-utility hub for sustainable precinct-scale solutions such as integrated parking, electric vehicle charging, battery storage, recycled water and organic waste systems, or bike facilities"

be investigated. We support this proposal and suggest that this hub be located beneath the Western Distributor and approach to the Anzac Bridge as this space is required to be kept free of structures to enable inspection and repair work to these elevated roadways. In the event that Chinese tours return to levels operating pre-pandemic, we also strongly recommend provision of off-street tour bus parking beneath these flyovers. We also request provision of sufficient numbers of disabled parking spaces, including on-street such parking directly outside the residential and commercial buildings.

> *Recommendation 16 – We support provision of a multi-utility hub for integrated parking, public fast electric charging, and other precinct services located under the Western Distributor and Anzac Bridge approaches. We also propose off-street tour bus parking similarly located and provision of adequate and accessible on-street disabled parking spaces.*

STREET HIERARCHY

Whilst the street hierarchy proposed for the current SFM site is satisfactory, the approaches to the site, especially for pedestrians remains unsatisfactory and unappealing, and pedestrian access from Wattle Street and Pyrmont Bridge Road/Harris Street require long delays at traffic lights. We have been unsuccessful in our requests for pedestrian priority in the phasing of lights associated with the Pyrmont Interchange and recommend that the best solution would be provision of an overpass at the Wattle Street intersection and, further East, an underpass from Bulwara Road/Pyrmont Bridge Road linking to the Gipps Street extension within the site. In particular, we support the proposed Park Street which will provide a much-needed short-cut from Wattle Street to Miller Street for local vehicular traffic (BBSSPS p85) and will reduce traffic congestion at 2 sets of lights for vehicles entering the Anzac Bridge approach. It may even be able to be used for our proposed new bus service as outlined above.

> *Recommendation 17 – We support the street hierarchy as proposed and the use of Park Street by local vehicular, bus and active transport, to cut congestion at the Pyrmont Interchange. We recommend improvements in pedestrian access from outside the BB Precinct, including provision of over- and under-passes.*

Fig 29, Public Domain Plan (p81) depicts a road (Bank Lane) encircling the towers which appears to abut the Western Distributor. Currently there are a number of mature fig trees growing in this area, most if not all likely to be removed. We propose that INSW, in consultation with the City of Sydney, examine the feasibility of transplanting them in existing parks, or in those planned for the BB precinct. In the construction of the Jacksons Landing precinct a number of mature figs were moved successfully to locations in the new parks constructed as part of the public domain, including Refinery Square and Waterfront Park.

> *Recommendation 18 – INSW and City of Sydney to investigate the relocation of mature figs currently growing at the site of the proposed Bank Lane.*

SOCIAL INFRASTRUCTURE

- Community Space - Despite the huge increase in residential and worker population over the 30 years of its transition from redundant industrial precinct to one which supports a vibrant and active community, there is a growing shortfall of community space to meet our needs. Whilst the Commonwealth provided funding through its Better Cities Program for the construction of the Ultimo Community Centre and Library, noting provision of additional community space by the nearby Uniting Church, Pyrmont's community Centre (PCC) has been unable to meet the current demand for space for community activities and programs. We have long sought the redevelopment of the City of Sydney-owned Maybanke Community Centre site as a Community Sports and Recreation Centre. This facility currently comprises 2 small courts and a

small building which was once a toilet block, but remains largely inaccessible as the City has not provided the required staffing to run it. The site is centrally located and close to Metro, bus and light rail stops and has the potential to be re-developed into a high quality indoor Sports and Recreation Centre enabling junior and senior teams to be formed and to both train and compete on full-sized courts.

We attach our case for the Maybanke redevelopment (Attachment 2) and propose that rather than include public courts in a precinct on the fringes of the Peninsula as proposed in the BBSSPS, developers should be required to make a contribution towards the development of this much-needed Sports and Recreation Centre located close to the PCC and easily accessed by workers and residents from all parts of Pyrmont and beyond. It should be noted that the City has recently approved inclusion of 2 public courts in the major mixed development currently underway in nearby Wattle Street. It should also be noted that the City operates a public library located at the Ultimo Community Centre, with a Library Link at the PCC. Volunteers also manage a Book Exchange at the PCC.

Recommendation 19 **–** *We strongly urge provision of a new Maybanke Community Sports and Recreation Centre constructed on the City of Sydney-owned Maybanke site in Harris Street, funded by BB developer contributions, rather than provision of public community facilities at Blackwattle Bay.*

- Educational Facilties – The *Infrastructure and Contributions Review* (Attachment 22 p28) outlines the schools located within Glebe and Ultimo (noting that Pyrmont has no schools) but only two are within 800m of the Study Area – Ultimo Primary School and the Blackwattle Bay Senior Secondary College. Whilst there are 3 private secondary schools also located within Glebe and Ultimo, the report fails to mention that the only public Junior Secondary School campuses are located well outside the Study Area in Leichhardt and Balmain, neither of which is served by convenient public transport for Peninsula students.

  The BB *Social Sustainability Assessment* Attachment 16 (p41) states the ''consultation with the Department of Education conducted by INSW has identified that the development will not trigger demands for new schools'' but it is also noted in Attachment 22 (p36) that ''an enquiry to the (Blackwattle Bay) campus indicated that they were at capacity and not accepting out of area enrolments''. Assuming that approximately 100 children from the Study Area attend the school, enrolments would increase to around 880 and this doesn't include children moving to new developments constructed elsewhere in the Pyrmont Peninsula. However, it is also reported that ''under current Department of Education policy, new local students would be required to be accepted and accommodated by the school.'' [Note that in a recent personal conversation with the current head of the Blackwattle Bay Campus, I was advised that this campus has the largest number of HSC students of any Public school in NSW.]

  The Department of Education has a poor record when it comes to predicting future school capacities. This is illustrated by the fact that in recent years the Ultimo Primary School has had to be rebuilt twice over a period of just 10 years in order to accommodate the unanticipated rapid increase in demand associated with the first period of the Peninsula's transformation. The situation is made worse by the Department's exclusion of Pyrmont and Ultimo high school students from the catchment of the new Inner City High School which is more easily accessed by public transport than Balmain or Leichhardt. Given that the projections only related to increases associated with the BB Study Area and did not take into account all the other developments, including residential, proposed in the PPPS, it is almost certain that demand will outstrip supply associated with existing schools in the vicinity of the Peninsula.

Recommendation 20 **–** *INSW to seek further independent investigations into the veracity of the Department of Education's demand forecasts for places at accessible public education campuses and require identification of those campuses with "a capacity for future growth" (Infrastructure and contributions Review p36)*

- Childcare – A new 80 place work-based childcare centre has been incorporated recently in the newly completed 21 Harris Street office building, with another 40 places incorporated within the re-built Ultimo Primary School. A new 80 place centre is also proposed for the recently approved development on the former Council depot site at Wattle/Fig Streets, close to the Blackwattle Bay Precinct. However, with the projected additional 8,500 residents and 22,935 workers projected to be attracted to the Pyrmont Peninsula (PPPS pp 48-74) with the implementation of the Place Strategy, it is certain that demand for places from both local families and workers will rise substantially. This demand can be met by the inclusion of childcare facilities in major commercial/mixed developments in most of the sub-precincts, including Blackwattle Bay Precinct.

  Recommendation 21 **–** *We support provision of childcare facilities within the podium of the mixed use development as proposed* (BBSSPS p100)

- Cultural Facilities – The *Arts and Culture Strategy* Attachment 30 (p10) states that "there is little or no current active arts and cultural presence in the Blackwattle Bay precinct" ie "no resident arts organisations and little regular programming of arts and cultural activities". We would contend that this lack extends across much of the Peninsula, as few, if any, licenced venues and party boats (which often broadcast very loud recorded "music" as they cruise past foreshore residential precincts around Sydney Harbour) offer live music. We appreciate the presence of the Lyric Theatre at The Star and the National Maritime Museum and welcome the continuing operation of the Powerhouse in Ultimo but have recently lost the not-for-profit *Culture at Work* organization with the sale of its publicly-owned heritage-listed premises by Property NSW. This organization provided affordable studio space, hosted an Artist-in-Residence program, exhibition space, and free art lessons to local children. A number of regular cultural activities are organized by community volunteers including the local choir, Pyrmont Sings!, the Pyrmont Players theatre group, the Pyrmont Ukelele Group, Pyrmont Photography Group and the Pyrmont Women's Art Group which meet, exhibit and perform at the Pyrmont Community Centre in sub-optimal conditions.

  Prior to the pandemic, musical performances have been included in local festivals and commemorative events, including the Pyrmont Food and Wine Festival organized by the local Chamber of Commerce, Christmas in Pyrmont, a street fair organized by local volunteers which regularly raises ~$100,000 for local charities, the local Anzac Day Service and Nativity and Carol performances held in Quarry Green, Ultimo and Union Square respectively. Monthly Farmers Markets were conducted at Pyrmont Bay Park until around 5 years ago and were very popular providing both visiting and local vendors opportunities to sell their goods to both visitors and locals.

  We note, with interest, the response of stakeholders attending the focus group workshops who "stressed the importance of the precinct's natural environment (especially the water) and its working harbour, local community and inclusiveness" (Attachment 30 (p13) and endorse their aspirations listed on p14, as well as those associated with the celebration of First Nations culture and heritage and First Nations engagement and collaboration. We also strongly support the recommendation (p25) for the provision of affordable space for arts practitioners, creative industries and local communities and have proposed above the inclusion of affordable studio space at 1-3 Bank Street. We are not convinced of the financial sustainability of a min 2,000 sqm

multi-purpose space in a new development, if it is to be accessible for those who may wish to use it but can't afford to, unless it is subsidized by the City of Sydney, or by State or Commonwealth Government grants.

The proposal to "foster synergies and collaboration between the area's knowledge-based industries and its arts and cultural programs" (p27) is welcome. Provision of both indoor and outdoor events space which is accessible to artists, performers, knowledge-based start-ups, possibly subsidized by more established ICT companies, education and tourism sectors is supported. [NB I worked at the Australian Technology Park for 10 years from its beginning and observed how successfully the re-purposed design of both the former Locomotive and Carriage Workshops facilitated collaboration between the scientists, aspiring entrepreneurs and more experienced business people as well as the establishment of technology start-ups, often through serendipitous and informal interactions in the large atriums served by cafes, or through attending events held both indoors and the large outside spaces.]

We strongly support provision of space dedicated to First Nations artists and arts and cultural programs, with the space being integrated such that it provides opportunities for cultural and knowledge exchange between residents, workers and visitors to the precinct. We note and support reference to the importance of early introduction of arts and cultural spaces, even before project completion (p31) and endorse the recommendation that "permanent event infrastructure and event DA provisions" are implemented across potential activation areas of the public domain. The insecure arrangements governing the monthly Growers Market saw its demise; and the organisers of the annual Pyrmont Food & Wine Festival have experienced considerable annual uncertainty in gaining the required approvals, making it difficult to plan the event. We also endorse "an activation strategy to accompany the master planning process" (p32) thus providing certainty to both event organisers and local residents who may be impacted.

In the Implementation Recommendations (p36) we note the absence of any reference to consultation or collaboration with members of the local community, including those engaged in or organizing the many local cultural activities and events. We recommend that INSW ensure community engagement in the implementation of the Blackwattle Bay Arts and Culture Strategy.

Recommendation 22 – We support: provision of dedicated space for First Nations artists and arts and cultural programs and heritage; provision of affordable space for arts practitioners; collaboration between knowledge-based industries and arts and cultural programs; inclusion of community in the implementation of Blackwattle Bay Arts and Cultural Strategy.

PUBLIC HOUSING

As part of the first transformation of the Pyrmont Peninsula, planners successfully integrated provision of new Public and Affordable Housing, owned and administered by the Department of Housing and City West Housing. Regrettably, the quantum of such housing forecast in the City West Housing Agreement between the Government and the City of Sydney was not realized as Affordable Housing levies for such purpose raised through Pyrmont developments were re-directed to other areas of the City undergoing redevelopment. As the residential population has grown, an active and caring community has grown and flourished comprising residents from all walks of life, including those living in well-placed Public Housing, who look out for one another and step in to help when needed.

Unfortunately, with the approval of the PPPS, Public Housing residents face the prospect of their homes being sold to private developers, as they are perceived as sites providing "opportunities for

redevelopment'' in a similar manner to those sold, or proposed to be sold to developers in Glebe, Erskineville and Waterloo, to be replaced by much smaller units which will not decrease the number of those on the housing waiting list (numbering over 50,000), let alone those displaced by the sale and demolition of their homes.

We note (BBSSPS p143) that ''the Greater Sydney Region Plan includes Affordable Rental Housing Targets for very low to low-income household... generally in the range of 5 – 10% of new residential floor space subject to viability''. INSW has adopted the lower figure of 5% for affordable housing through developer contributions (percentage unspecified). To go anywhere near addressing the need for Public Housing in a wealthy city in a wealthy country, a minimum of 20% of new housing developments should be dedicated for Public and Affordable Housing to reduce the number of homeless – currently at a level to shame those in all levels of Government – in line with the views of those who participated in the consultation process (Revitalising Blackwattle Bay p4). Affordable Housing developer contributions should be used to provide such accommodation within the Pyrmont Peninsula not elsewhere in Sydney or NSW.

> *Recommendation 23 – A minimum of 20% of new residential development in the Pyrmont Peninsula should be dedicated to provision of Public and Affordable Housing, involving a mix of studio, 1, 2 and 3 bedroom apartments to ensure families eg those escaping domestic violence, as well as couples and singles can be accommodated with security of tenure.*

ZONINGS

The BBSSPS proposes developments comprising 48% for employment and non-residential uses and 52% for residential uses (BBSSPS p79). We have not reached a consensus on the mix of uses of buildings in the precinct, with quite a few members favouring non-residential uses, including a mix of community, retail and commercial uses; and the remainder favouring a mix of uses, including provision for affordable housing within the Precinct. However, all members have concerns about the suitability of towers for residential purposes, given the impacts associated with the Western Distributor and the Hymix plant, and the consequential need to keep windows closed thus depriving residents of the cross ventilation, so necessary to meet Sustainability standards. Given the lack of consultation prior to the incorporation of the BBSSPS in the PPPS, we propose that further consideration be given not only to the height and scale of the proposed buildings but to the allocation of building uses across the precinct in consultation with the community.

> *Recommendation 24 – INSW to reconsider the mix of uses of buildings within the BB Precinct in consultation with the community.*

SUSTAINABILITY

In line with commitments to actions to reduce carbon emissions, including the NSW Government's commitment to attain net zero emission by 2050 and 35% emissions reduction by 2030 compared with 2005 levels (p9); and the City of Sydney's aspirations to achieve 70% reductions by 2030 from 2006 levels (p11), the *Ecologically Sustainable Development Report* (Attachment 32) recommends the adoption of the Green Star – Communities governance framework to ''inform decision making and design development'', noting that this framework is being upgraded and new Future Focus tools developed. The Report also recommends the use of these tools to ''ensure the latest standard of sustainability governance is applied...'' (p17) in order to ''achieve a much greater rating than the currently used 5-Star Green Star Communities Future Focus rating...'' in the Precinct. We support this recommendation. Sustainability measures are summarized below:

Passive Design - We support the inclusion of Passive Design as a non-negotiable requirement to reduce power demand for all projects within the Precinct (p19). This approach includes consideration of "building orientation, layout, shading, thermal mass, natural ventilation, insulation, window placement and design, and sky-lighting". Given that views will include those from the West or North-West, adoption of this recommendation will be challenging to implement. Challenges will also be faced in that achieving natural ventilation may require opening east-facing windows with the possibility of noise and poor air quality impacts emanating from the adjacent elevated freeways. In considering building orientation, account needs to be taken of the impact of prevailing strong winds, north-easterly in summer, and SE and Westerly winds in winter, noting that balconies in many of the taller apartment buildings in Pyrmont facing in these directions are unusable for much of the year. Residents have experienced the movement of heavy furniture by strong winds such that glass balustrade panels and windows have been damaged.

The report also explores other initiatives for a reduction in energy consumption and emissions including: energy efficiency measures eg effective insulation and smart lighting; building electrification requiring a transition from gas to electricity; use of renewable electricity; installation of on-site renewable energy (PV systems) which "can assist in meeting and exceeding several targets set for the precinct" (p22), noting that "it is likely that off-site renewable energy will be required to contribute in meeting the target of 50% renewable energy in the precinct" (p23); installation of precinct-scale microgrids requiring central governance (p24); long-term power purchase agreements for electricity generated by off-site renewables (p24); green infrastructure eg green roofs and vertical gardens (p25) which is described as "corresponding well to priorities for the BB sub-precinct" in the PPPS; use of cool roofs and pavements using light-coloured materials to reflect solar radiation is also an option. Whilst all these options are explored, the report makes no firm recommendation as to which option or suite of options will achieve the best ESD outcome. It does, however, recommend that all designs undergo in-house review, review by the Design Advisory Group, Project Working Group and the Project Review Panel, and reference to Design Review Panels (DRPs), as well as consideration of the incorporation of community feedback in future design processes (p48). It should be noted that DPIE has recently arranged for Community Observers to sit in on sessions of DRPs examining the concept Master Plans for The Star and UTS Ultimo and Haymarket Key Sites making presentations to the Panel and providing further comments following a Q&R session with the proponents. We recommend this inclusion as one measure to ensure community views are taken into consideration during the assessment process.

- EV Charging Infrastructure – Noting that by 2040 EV's are projected to account for 70 – 100% of new vehicle sales we strongly support incorporation of fast EV charging stations in the proposed parking and services hub foreshadowed for this Key Site (PPPS p67). It is not clear whether it is proposed that parking in this hub would be restricted to residents and workers associated with the precinct, or include public parking. If public parking is excluded from the hub, we urge provision of fast EV charging in public parking areas, and if private parking is to be provided within developments, slower, off-peak EV charging could be accommodated. At present, the transition from conventional fossil-fueled vehicles to EV is inhibited by the lack of public charging points, including in the City of Sydney, and the difficulty and cost of retro-fitting existing apartment and office buildings. The decreasing cost of EVs combined with increasing improvements in the efficiency of batteries enabling progressively faster charging and longer travel distances, will see take up accelerate, so provision of public and private EV charging points is critical in ensuring that the BB Precinct meets the Government's and City of Sydney's emissions reduction targets.

- Water Recycling – The ESD Report makes a distinction between the management of stormwater and rainwater (p31). We support all measures recommended in this report. In particular, we encourage collection of the large amounts of water which emerge from the cliff face of the Western Escarpment opposite the proposed Bank St park noting that the aquifers which fed Tinkers Well (providing fresh water to the First Nations people living and using the area, as well as the early settlers after colonisation) are still very much in operation, even in prolonged dry periods. Until recent improvements to the road drainage system, this section of Bank Street was frequently flooded during heavy downpours. Capture and re-use of this water will ensure a continuous supply for the maintenance of the proposed park. We also support the use of water absorbent materials and grass, rather than concrete wherever possible in public spaces throughout the precinct, noting that the manufacture of cement accounts for over 6% of global emissions.

Recommendation 25 **–** *We support: adoption of Green Star Communities national framework to drive ESD planning in the precinct; mandatory Passive Design measures for all precinct buildings; energy efficiency measures and installation of on-site renewable energy systems and battery storage; installation of fast public EV charging stations, and within the proposed services/parking hub; maximizing on-site storm/rainwater collection and recycling across the precinct; maximizing use of absorbent surfaces in public spaces.*

FIRST NATIONS' RECOGNITION

We strongly support the recommendations in the *Aboriginal Cultural Heritage Assessment Report* Attachment 27 (p32) in relation to the 1A and 1-3 Bank St sites, that further archaeological testing be carried out in these areas. It appears that 1A, in particular, has had relatively little disturbance, with the "potential for intact preserved natural soil profiles and therefore for intact Aboriginal objects or places" to be identified. Table 9 (p 33) confirms the moderate to high historic and scientific significance of Blackwattle Bay investigation area and the rarity of such sites in an area which has been subjected to so much destructive development. The report (p35) goes on to suggest that "ground disturbing works" may be undertaken on these sites which are zoned Public Recreation. 1A Bank St accommodates possibly the only area of relatively undisturbed bushland in the precinct and should only be lightly disturbed for the investigation of its archaeological significance for that reason.

We support the views of Registered Aboriginal Parties that despite disturbances, the Precinct is "in a foreshore location once highly utilized by local Aboriginal people and its associated cultural values are therefore high and not limited to archaeological potential" (BBSSPS p162). We also support the strategies and recommendations developed by City People outlined Table 21 (BBSSPS pp163-165), ensuring the highest degree of involvement of First Nations people, but recommend that there be more than one First Nations arts and culture representative on the proposed arts advisory panel. Every effort should be made to include First Nations people in all aspects of the implementation of all strategies associated with their archaeology, history, culture and artistic expression in the development of the precinct, noting that 17 First Nations stakeholders registered as holding cultural knowledge relevant to the determination of their cultural values but only 2 people attended the site visit on 17 June, 2017, or provided feedback on the draft report (ACHA pp 8-10).

Recommendation 26 **–** *Support recommendations to further test sites identified as having possible archaeological significance; ensure only light disturbance on the 1A Bank St site.*

Recommendation 27 **–** *Support strategies and recommendations developed by City People ensuring highest degree of involvement of First Nations people; increase First Nations' representation on proposed arts advisory panel and other implementation bodies.*

We highly commend the document *Gallumban Gabami: Connecting with Country Framework for Tjerruing Blackwattle Bay* (Attachment 28) prepared by Bangawarra in March 2021, as a guide to appropriate First Nations' recognition in the design of the precinct. In particular, we share the frustrations of the authors of this seminal work expressed in the observation that "it is highly offensive to approach communities with an already established design and strategy to request approval and sign off for a tick-a-box outcome" (p48). The primacy of Country, and living respectfully with Country should be the guiding principle for any development and Governments, developers and local non-First Nations members of communities are asked to take care not to "succumb to the inherently racist, colonial impositions on local Aboriginal cultures and continue the erasure and silencing of Aboriginal peoples". (p15).

> *Recommendation 28 – Primacy of Country should be the guiding principle for precinct development.*

In discussing the implementation of principles across Tjerruning Blackwattle Bay, the authors highlight the need of local Sydney Traditional Owners and their Aboriginal Elders and Knowledge Keepers "to have opportunities to share their deep Ancestral knowledges of this place with all those who come to Tjerruing Blackwattle Bay to live, work or visit…" (p29). It is recommended that urban development and landscape need to:

- incorporate complete ecologies, including faunal habitat and locally native planting that is not confined to openings in concrete or planted in areas of monoculture (p31);
- incorporate stories of Country throughout the public spaces of Tjerruing Blackwattle Bay (p32);
- reflect the stories of Country, the features and the creatures of this place in the languages of the local peoples (at the very least D'harawal, Dharug, Eora and Gai-maragal (p33);
- show where the shoreline was, as well as the stories of Country (p33);
- acknowledge the outcrops and peninsula highpoints as ceremonial space (p34) (noting these are outside of the precinct boundary);
- incorporate measures for future anticipated climate change and sea level rise (p36);
- provide a dedicated space where everyone can celebrate local Aboriginal cultures, story, history, performance and knowledges, acknowledging that the proximity to the new fish market also ensures a regular influx of visitors and tourists who would be an enthusiastic prospective audience (p37).

> *Recommendation 29 – Adopt the recommendations outlined in the Caring for Country Strategy Chapter (pp28 – 37).*

In line with the recommendations above, we strongly support the re-naming of the precinct as Tjerruing Blackwattle Bay, the proposed park in Bank Street as Tjerruing Park, with other parks, streets, promenades and plazas also using First Nations words, selection of which should be done in consultation with those with First Nations' association with this Country.

> *Recommendation 30 – Support using appropriate First Nations' names, including Tjerruing, throughout the precinct in consultation with First Nations people associated with the precinct.*

CONCLUSIONS

The amount of material provided with the BBSSPS has been extremely challenging to absorb and assess and has covered a huge range of issues. Whilst we have endorsed a number of features presented, our primary concern remains the height and scale of the proposed developments. These will have a highly significant adverse impact on local residents in particular – and that impact has received little, if any, analysis. There has been scant genuine engagement with the Pyrmont and other affected

communities, with the heights of buildings presented as a *fait accompli*, not only to the communities, but to those developing the Pyrmont Peninsula Place Strategy. We urge the Government (INSW and DPIE) to reconsider the maximum height limits thus established, and reimagine the Blackwattle Bay Key Site as one which "complements and enhances the area", not one which destroys the amenity of the many thousands of residents in Pyrmont, Glebe and beyond.

The Coalition was voted into power with a policy to "return planning powers to the people". With more than 10 years of this government in power, we have seen a progressive and dramatic whittling away of people's ability to influence planning and environmental protection in NSW, and a similar reduction in the planning powers of local governments. Concurrently, we have seen a rise in influence of quasi-advisory bodies such as the Committee for Sydney and the Western Harbours Alliance, whose members include representatives of large development companies and those with vested interests in the extraordinary push for so-called "transformation" of places where the citizens of Sydney live, work and play, turning them into CBD copycats, and in the process substantially reducing the amenity of homes and lives.

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Pyrmont. NSW 2009
0409 552 117
elizabeth.elenius@gmail.com

RECOMMENDATIONS

Recommendation 1 - The Minister for Planning, Industry & Environment to require DPIE to review INSW's proposals for Blackwattle Bay, and "allow the time to invest in genuine further consultation" with the community and the City of Sydney in order to meet their expectations of "urban renewal that respects the industrial heritage and architectural scale of Pyrmont without overshadowing the surrounding area" (p4 Revitalising Blackwattle Bay).

Recommendation 2 – The Blackwattle Bay Key Site planning framework should involve preparation of a Master Plan requiring genuine community participation and agreement of the ***City of Sydney; we reject the Site's State Significan****t declaration and amendments to the Sydney LEP to permit a maximum building height of RL 156; we seek compliance with SREP 26 provisions to ensure that developments protect and enhance views and the scenic quality of foreshores and waterways.*

Recommendation 3 – The BBSSPS provisions must ensure that all developer contributions raised through BB developments are allocated to projects that benefit Pyrmont Peninsula communities and not undermine or offset the funding and delivery of local contributions and infrastructure under the relevant contributions plan. The community must be consulted before any plan for the distribution of contributions is finalized and the agreed (with the City of Sydney and the Pyrmont/Ultimo communities) infrastructure delivered prior to the construction of residential and commercial buildings.

Recommendation 4 – INSW should engage independent consultants to prepare projections of demand for housing and commercial space taking into account the long-term impacts of the Covid pandemic and the worsening relationship between Australia and China.

Recommendation 5 – The cost of construction of the new SFM should be shared between the Government and industries benefitting from the development, enabling a reduction in the height and scale of the proposed Blackwattle Bay Precinct developments.

Recommendation 6 – Building heights should be reduced significantly and "complement and enhance" the existing built form, in line with the views expressed through the consultation process. We reject tall towers and bulky podiums so close to the waterfront.

Recommendation 7 – Building height should take into account adverse wind effects generated by the proposed towers.

Recommendation 8 – Planning for Public Open Space in the Blackwattle Bay Key Site should be conducted under the provisions of the EP& A Act with the City of Sydney as the consent authority for projects under $10m and the Planning Minister for those over $10m. The community must be genuinely engaged as stakeholders from the earliest stages of planning for the public realm.

Recommendation 9 – Ensure that BB Key Site developments do not further reduce the economic viability of small businesses located in Pyrmont Village by requiring funding to be directed to provision of centrally located regional community infrastructure eg the Maybanke Sports and Recreation Centre (PPPS p75), improved lighting and signage.

Recommendation 10 – Significantly expand the provision of green public recreation areas along the foreshore by reducing the building footprints of all proposed new developments.

Recommendation 11 – Support the re-use or demolition and redevelopment of the buildings on 1 – 3 Bank Street for community, boating and cultural uses, including a café/bar/restaurant to serve both the community and visitors. Support the re-location of the temporary marina to the Southern section of the Precinct. The design for the proposed park at Bank Street, from the earliest stage of planning, should be developed in partnership with community and stakeholders.

Recommendation 12 – The foreshore promenade should be 30m wide along its total length from Urban Park near the new SFM to the path serving the temporary marina.

Recommendation 13 – Parks and reserves to be green and natural and hard surfaces avoided in public areas where possible.

Recommendation 14 – We urge a condition of approval of residential and commercial developments, and of open space development involve the installation of CCTV cameras and strategic lighting to ensure the safety and security of residents, workers and visitors to the BB Precinct; we ask INSW to support the installation of a police station at the Pyrmont Metro station.

Recommendation 15 – We support: construction of a pedestrian tunnel linking Metro platform with Fish Markets LR station; additional services on the Dulwich Hill to Central Light Rail line; a new bus service from Pyrmont via Harris St to Broadway, Parramatta Road to Sydney University, RPAH, Pyrmont Bridge Road to Glebe, Sydney Fish Markets, Bank/Bowman Street to Harris Street; reinstatement of 389 bus stops; new ferry service to Blackwattle Bay to include stop at White Bay; inclusion of Pyrmont/Ultimo students within the catchment of the new Inner City High School. We oppose extension of the cycleway in Pyrmont Bridge Road beyond its intersection with Bulwara Road.

Recommendation 16 – We support provision of a multi-utility hub for integrated parking, public fast electric charging, and other precinct services located under the Western Distributor and Anzac Bridge approaches. We also propose off-street tour bus parking similarly located and provision of adequate and accessible on-street disabled parking spaces.

Recommendation 17 – We support the street hierarchy as proposed and the use of Park Street by local vehicular, bus and active transport, to cut congestion at the Pyrmont Interchange. We recommend improvements in pedestrian access from outside the BB Precinct, including provision of over- and under-passes.

Recommendation 18 – INSW and City of Sydney to investigate the relocation of mature figs currently growing at the site of the proposed Bank Lane.

Recommendation 19 – We strongly urge provision of a new Maybanke Community Sports and Recreation Centre constructed on the City of Sydney-owned Maybanke site in Harris Street, funded by BB developer contributions, rather than provision of public community facilities at Blackwattle Bay.

Recommendation 20 – INSW to seek further independent investigations into the veracity of the Department of Education's demand forecasts for places at accessible public education campuses and require identification of those campuses with "a capacity for future growth" (Infrastructure and contributions Review p36)

Recommendation 21 – We support provision of childcare facilities within the podium of the mixed use development as proposed (BBSSPS p100)

Recommendation 22 – We support: provision of dedicated space for First Nations artists and arts and cultural programs and heritage; provision of affordable space for arts practitioners; collaboration between knowledge-based industries and arts and cultural programs; inclusion of community in the implementation of Blackwattle Bay Arts and Cultural Strategy.

Recommendation 23 – A minimum of 20% of new residential development in the Pyrmont Peninsula should be dedicated to provision of Public and Affordable Housing, involving a mix of studio, 1, 2 and 3 bedroom apartments to ensure families eg those escaping domestic violence, as well as couples and singles can be accommodated with security of tenure.

Recommendation 24 – INSW to reconsider the mix of uses of buildings within the BB Precinct in consultation with the community.

Recommendation 25 – We support: adoption of Green Star Communities national framework to drive ESD planning in the precinct; mandatory Passive Design measures for all precinct buildings; energy efficiency measures and installation of on-site renewable energy systems and battery storage; installation of fast public EV charging stations, and within the proposed services/parking hub; maximizing on-site storm/rainwater collection and recycling across the precinct; maximizing use of absorbent surfaces in public spaces.

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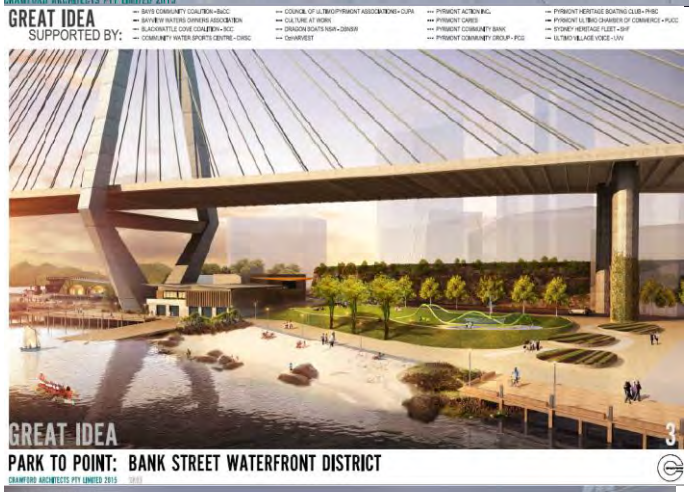
Recommendation 28 – Primacy of Country should be the guiding principle for precinct development.

Recommendation 29 – Adopt the recommendations outlined in the Caring for Country Strategy Chapter (pp28 – 37).

Recommendation 30 – Support using appropriate First Nations' names, including Tjerruing, throughout the precinct in consultation with First Nations people associated with the precinct.

APPENDIX 1 – PYRMONT COMMUNITY VISION FOR BANK STREET PUBLIC RECREATION AREA – OCTOBER 2015



APPENDIX 2 - SPORTING AND RECREATIONAL FACILITIES ON THE PYRMONT PENINSULA

In accordance with the State Significant Plan (SSP) process, submissions from the public are currently being sought regarding the future of Blackwattle Bay. The Pyrmont peninsula is a sub-precinct of Blackwattle Bay and the Pyrmont Peninsula Place Strategy (PPPS) feeds into planning for the Bays precinct as a whole.

This submission relates to the report on the PPPS commissioned by DPIE and undertaken by Cred Consulting (October 2020), *Social Infrastructure assessment,* Part 5: **Gap Analysis and Action Plan – *Open space and recreation facilities*,** p.118, Specifically Need 6: Increased indoor and outdoor courts for informal recreation.

We draw the planners' attention to the Maybanke site in Harris Street Pyrmont and its eminent suitability and availability for the above purpose. (see attached plan of site area)

Maybanke: its history and current status

1965: The General Manager of the Colonial Sugar Refining Company at Pyrmont offered the site to Council for perpetual use for recreational purposes;
1970: Council accepted CSR's gift;
1979: The site was acquired by Council.

Thus Council owns the site. A small basketball court occupies to the lower level, a difficult-to-access small-sized tennis court the upper level, and there is a small cement-block building.

2007: The potential for redevelopment of Maybanke was acknowledged in 2007, when Council received the *Open Space and Recreation Needs Study* it had commissioned from Stratcorp Consulting. That document proposed a **Capital Works Program,** with an accompanying **Direction: Continue capital works allocations and funding to the open space network and recreation facilities.**
Under **Projects Initiatives/Actions** and the heading **Key current major park and recreation facilities projects t**hree 'recreation facilities' were listed and rated as short to medium priority, that is, to be finished by 2012:

Ian Thorpe Aquatic Centre
Waterloo Youth Centre
Maybanke Youth Centre.

The first two projects were completed and are operating, but for whatever reason there has been no subsequent redevelopment of Maybanke.

The difficult topography of the site and Council's failure to redevelop means that Maybanke Centre, as it is currently called, is largely unused and unusable.

However, the site has significant advantages which make it ripe and highly suitable for redevelopment:

- It sits on an area of Council-owned land which is large enough to accommodate a several-storey multipurpose sports and recreation centre.

- The difficulties of the site align with a significant potential asset: it sits on the sandstone for which Pyrmont is famous. In 2017 over 1000 blocks of high-quality yellow block sandstone were excavated from a building site almost adjacent to the Maybanke site. It seems likely that similar high-quality sandstone, which is highly sought after for heritage and restoration purposes, could be 'harvested' from the Maybanke site. This would defray the cost of redevelopment.

- A redeveloped Maybanke could accommodate:

1. Outdoor and indoor recreational activities for children and youth;
2. multipurpose sports courts;
3. a gym for adults aged 20 to 35 and young people with focused programs, including those who cannot afford private gym membership;
4. exercise space and equipment for over 55s;
5. space and equipment for sporting teams; and
6. café, meeting spaces, change and shower rooms.

Adapted from previous submissions from:
Friends of Pyrmont Community Centre
Council of Ultimo Pyrmont Associations (CUPA)
Pyrmont Action Inc.
Pyrmont Cares Inc.
Pyrmont Community Group

July 2021

Attachment: Maybanke Plan DP576037

PYRMONTACTION

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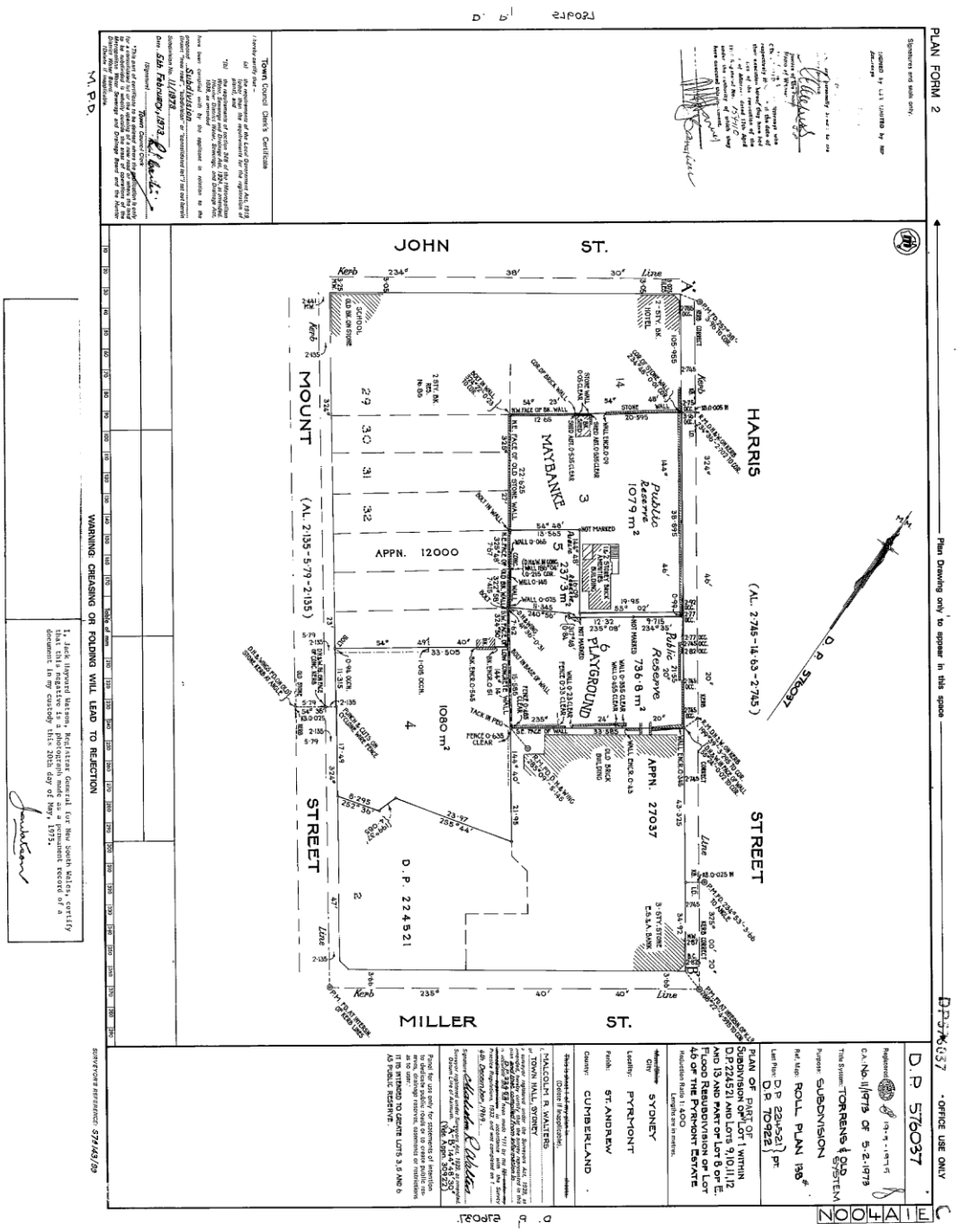

182096

Lum

Pyrmont

I am writing to object to the proposed redevelopment of Blackwattle Bay.

The project is inconsistent with the Governmentâ€™s own Pyrmont Peninsula Place Strategy. The projected 3000 new residents will overload existing infrastructure and amenities, including schools and health facilities.

The roads to and through Pyrmont are already overloaded from too much traffic, much of it is heading onto the Anzac Bridge which makes it impossible for Pyrmont locals to get home through cars blocking the lanes heading into Pyrmont.

The towers along the foreshore exceed current allowable building heights and floor area. They will block sunlight to Wentworth Park, Pyrmont and Ultimo. The scale of these towers is inappropriate for this location which is mostly residential.

The narrow foreshore boulevard, overshadowed and dominated by the towers, will not be an inviting, public space but a commercial retail precinct. The park proposed at the northern end of under the Anzac Bridge is an unpleasant leftover space with the least amount of real estate value, which is why itâ€™s proposed for the park.

The incorporation of Hansenâ€™s concrete plant into the lower levels of one of the residential towers seems in appropriate. How does a concrete plant co-exist with a residential building and green public space, especially when concrete trucks are required to enter and exit the site to transport the concrete?

There has been a lack of genuine community consultation; the previous round of feedback seems to have been largely ignored the aspirations and objections of the Pyrmont and Ultimo community.

Ken Lum
Apt 4, 25 Bowman Street
Pyrmont, NSW, 2009

20 August 2021

Department of Planning, Industry and Environment

To Whom It May Concern,

Re: Blackwattle Bay redevelopment submission

I am writing to object to the proposed redevelopment of Blackwattle Bay.

The project is inconsistent with the Government's own Pyrmont Peninsula Place Strategy. The projected 3000 new residents will overload existing infrastructure and amenities, including schools and health facilities.

The roads to and through Pyrmont are already overloaded from too much traffic, much of it is heading onto the Anzac Bridge which makes it impossible for Pyrmont locals to get home through cars blocking the lanes heading into Pyrmont.

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The incorporation of Hansen's concrete plant into the lower levels of one of the residential towers seems in appropriate. How does a concrete plant co-exist with a residential building and green public space, especially when concrete trucks are required to enter and exit the site to transport the concrete?

There has been a lack of genuine community consultation; the previous round of feedback seems to have been largely ignored the aspirations and objections of the Pyrmont and Ultimo community.

Your Sincerely,

Ken Lum

181641

Lum

Pyrmont

I am writing to object to the proposed redevelopment of Blackwattle Bay. I am not opposed to development of the precinct if it is of a suitable scale appropriate to the area and can be supported by the level of infrastructure that can be reasonably implemented on the peninsula.

The following are the reasons for my objection:

â€¢ The project is inconsistent with the Governmentâ€™s own Pyrmont Peninsula Place Strategy

â€¢ 3000 new residents will add more traffic (regardless of the minimal off-street parking proposed) and overload existing infrastructure and amenities, including schools and health facilities.

â€¢ The towers along the foreshore exceed current allowable building heights and FSR. They will block solar access to Wentworth Park, Pyrmont, Ultimo and each other.

â€¢ The scale of these buildings is inappropriate for this location. Their density and close proximity to each other will mean it will be difficult to achieve Apartment Design Guideline requirements for cross ventilation and solar access.

â€¢ The proposal does not demonstrate the five principles of the incoming Design and Place SEPP.

â€¢ The narrow foreshore boulevard, overshadowed and dominated by the towers, would not be an inviting, public space. The parkland proposed at the northern end of the site under the Anzac Bridge is an unpleasant leftover space that might be seen to be difficult to develop into anything else.

â€¢ The incorporation of Hansenâ€™s concrete plant into the lower levels of one of the residential towers does not seem to be a feasible proposal.

â€¢ There has been a lack of genuine community consultation; the previous round of feedback seems to have been largely ignored as the proposal is overdevelopment of a scale that the Pyrmont and Ultimo community objects.

Maggie Lum
12B/4 Distillery Drive
Pyrmont, NSW, 2009

19 August 2021

Department of Planning, Industry and Environment

To Whom It May Concern,

Re: Blackwattle Bay redevelopment submission

I am writing to object to the proposed redevelopment of Blackwattle Bay. I am not opposed to development of the precinct if it is of a suitable scale appropriate to the area and can be supported by the level of infrastructure that can be reasonably implemented on the peninsula.

The following are the reasons for my objection:

- The project is inconsistent with the Government's own Pyrmont Peninsula Place Strategy
- 3000 new residents will add more traffic (regardless of the minimal off-street parking proposed) and overload existing infrastructure and amenities, including schools and health facilities.
- The towers along the foreshore exceed current allowable building heights and FSR. They will block solar access to Wentworth Park, Pyrmont, Ultimo and each other.
- The scale of these buildings is inappropriate for this location. Their density and close proximity to each other will mean it will be difficult to achieve Apartment Design Guideline requirements for cross ventilation and solar access.
- The proposal does not demonstrate the five principles of the incoming Design and Place SEPP.
- The narrow foreshore boulevard, overshadowed and dominated by the towers, would not be an **inviting, public space**. The parkland proposed at the northern end of the site under the Anzac Bridge is an unpleasant leftover space that might be seen to be difficult to develop into anything else.
- The incorporation of Hansen's concrete plant into the lower levels of one of the residential towers does not seem to be a feasible proposal.
- There has been a lack of genuine community consultation; the previous round of feedback seems to have been largely ignored as the proposal is overdevelopment of a scale that the Pyrmont and Ultimo community objects.

Your Sincerely,

Maggie Lum

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2000

See PDF attached

Blackwattle Bay - State Significant Precinct (SSP) Plan

June 2021, revised 14 July 2021

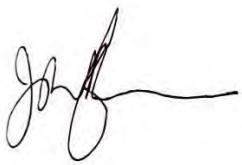
Shelter NSW (Shelter) is a non-profit, member-based organisation that was founded in 1975 and today represents a diverse network of individuals and organisations. These members share our vision of a sustainable housing system across New South Wales, with the aim of providing a secure home for all. To advance our vision, we engage our members, experts, and partners on housing reforms that benefit our economy, our society, and our environment.

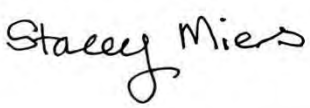
With more than a third of the population struggling in an expensive unaffordable rental market, our work is focused primarily on conducting housing research and advocating on behalf of these residents; particularly those on low to moderate incomes. One of our primary aims is to find a way to mitigate the growing impact of housing inequality across our cities and towns. Indeed, the need for this has been heightened further due to the impact of Covid-19, whereby access to an affordable home has become even more vital in establishing overall safety and security for NSW residents. Shelter NSW is committed to ensuring that at least 5% of all housing in each LGA in NSW is provided as Social Housing for those on very low incomes. In addition, we are supportive of planning proposals to increase Affordable Housing for essential workers, particularly in key urban areas such as the City of Sydney.

Shelter NSW's submission on the 'Blackwattle Bay - State Significant Precinct (SSP) development proposal' is therefore focused on ways to address the needs of that percentage of the population who don't own a home - residents who are struggling to meet their housing costs. With this as our driver, we advocate for ways to address the growing problem of declining housing affordability across greater Sydney and NSW.

If you wish to discuss our submission in more detail, please contact Stacey Miers on 0410 633 272 or by email at stacey@shelternsw.org.au or our CEO, John Engeler, on 02 9267 5733 or by email at john@shelternsw.org.au.

Sincerely Yours,





John Engeler

Chief Executive Officer, Shelter NSW

Stacey Miers

Principal Planning Officer, Shelter NSW

Broad overview of Housing Affordability impacts linked to the transformation and revisioning of the Blackwattle Bay Precinct

The Blackwattle Bay area sits on the edge of Pyrmont – an area which has slowly transformed from being predominantly low-rise industrial and working-class residential, to high-rise residential, technology services and office blocks.

In 1992 the 'City West Development Corporation' (CWDC) was commissioned with the task of overseeing the redevelopment of Pyrmont and Ultimo. CWDC recognised that the transformation of these waterside suburbs would see many of the surviving longer-term residents priced out of the area. In response, they took a courageous step and supported the establishment of 'City West Housing', a not-for-profit organisation aimed at delivering affordable rental homes in Pyrmont and Ultimo.

The Blackwattle Bay precinct, approximately 10.4 hectares of land, is the next stage in this historical transformation of the Sydney harbour bays precinct. The redevelopment proposal for Blackwattle Bay points to the creation of extensive parklands, harbour foreshore walkways and easy access to Wentworth Park, thus making the area a highly desirable location. The Blackwattle Bay area also adjoins the proposed harbourside precinct, connecting it to the new purpose-built fish market precinct and building.

Up until October 2017, Wentworth Park had a substantial population of "rough sleepers". However, in that year, the NSW Government initiated a campaign to remove the homeless. The Department of Family and Community Services brought in security services and worked with the homeless community, offering them temporary accommodation. As stated in the article by O'Rourke and McNab (2017), at the time there was a homelessness dilemma - not enough public or affordable housing stock available to house these people[1]. It's hard to imagine that the campaign to remove the rough sleepers from Wentworth Park was disconnected from the proposed Fish Market and Blackwattle Bay State Significant Development (SSD) initiatives. More broadly, the existence of the rough sleeper community shows a growing need for more public and affordable housing options to be delivered. One of the best opportunities to do this would be leveraging the substantial planning benefits being delivered on Government-owned and controlled redevelopment sites like Blackwattle Bay.

[1] References: Jim O'Rourke and Heather McNab. The Daily Telegraph Inner West Courier Inner City. Rough sleepers in Sydney's Wentworth Park kicked out by NSW Government Authorities. October 12, 2017. https://www.dailytelegraph.com.au/newslocal/inner-west/rough-sleepers-in-sydneys-wentworth-park-kicked-out-by-nsw-government-authorities/news-story/f8c3bb6bc8a2085984e6119ce90f8fca.
City Hub CITY NEWS. Homeless hounded in park.
https://cityhubsydney.com.au/2017/10/homeless-hounded-in-park/

The Blackwattle Bay area is serviced by the Sydney Metro West light rail system and the new Bays light rail station[2] providing an easy connection between Blackwattle Bay, Sydney CBD and Western Sydney. This level of public transport access makes the precinct an even more desirable location.

The suburb of Ultimo, which adjoins Pyrmont, is also home to a new state of the art, high-quality public school - the catchment area for which includes Blackwattle Bay. It is therefore predicted that people on higher incomes will buy into the area to access the school, placing additional pressure on housing prices. This will, in turn, see lower-income families further displaced.

Blackwattle Bay also edges the suburbs of Glebe, Forest Lodge, Lilyfield, Pyrmont and Ultimo which are all experiencing redevelopment pressures and rising housing costs. Glebe in particular has seen an ongoing decline in its public housing stock, going from 1,065 dwellings in 2011 to 981 by 2016. Since 2016, further public housing stock has been sold, resulting in an ever-declining safety net for lower-income households in the area.

Due to soaring housing costs, income diversity in the area is declining as lower-income families are forced out. Furthermore, Covid-19 has clearly shown just how important essential workers (childcare workers, cleaners, administration staff, tradespeople, retail workers, wait staff etc) are in delivering an efficient and vibrant functioning city. This impact is highlighted in the Blackwattle Bay State Significant Precinct report (June 2021) and related documents, which point out that many younger residents are also leaving the area to access more affordable housing options. The report notes that delivering housing choices for lower-income earners within the LGA will be a challenge. Conversely, the precinct plan aims to deliver approximately 5,600 new jobs. These jobs will in large part be targeted at a younger population, furthering the troubling mismatch between the increased cost of available housing supply and the incomes of younger employees in the area. The significant barriers these young people face in accessing affordable housing will undoubtedly in turn have an impact on the local job market and recruitments prospects.

In short, the Blackwattle Bay redevelopment will deliver an attractive but expensive place to live, along with limited housing affordability options. With this in mind, Shelter NSW considers the delivery of affordable housing as a key element for consideration in the Government's Strategy.

[2] https://www.sydneymetro.info/station/bays-station

Image - Vision of Future Revitalised, Blackwattle Bay

Social Impacts and Mitigation Strategies

Shelter NSW has reviewed the Blackwattle Bay SSD proposal from the perspective of low to moderate-income households who either already live in the area or may be employed there in the future. We are concerned about the growing mismatch between the recommended strategic directions and the initiatives to deliver a range of affordable rental housing options within the precinct. As such, we make a series of housing-related observations and recommendations regarding the Blackwattle Bay redevelopment plan.

Affordable Housing as Essential Infrastructure

The report notes that the State Government sees public infrastructure as being the following facilities or services:

- State and regional roads
- Bus interchanges and bus lanes
- Land required for regional open space, including land required for the foreshore promenade
- Embellishments or connections to regional open space and
- Social infrastructure and facilities.

Considering that 35% of the NSW housing stock is occupied by renters, and around a third of them are in permanent rental stress, we at Shelter NSW maintain that essential social infrastructure should permanently include a percentage of affordable rental housing. It is also our experience that placing affordable housing outside the parameters of essential infrastructure will often see it traded off against other infrastructure costs. In short,

affordable housing is habitually the loser in the infrastructure negotiation game. Shelter NSW therefore supports the inclusion of affordable housing (including public and community housing) as essential infrastructure. This definition aligns with the Australian Infrastructure Audit (2019).

Realistic Affordable Housing Deliverables and Targets

The Blackwattle Bay SSD report states that the appropriate monetary contribution rate for Blackwattle Bay is yet to be determined and that the overall contributions will need to be balanced against the general public amenities and services. This language reflects that used in similar redevelopment sites by the State Planning Authority and in other SSDs. One example is the Redfern-Waterloo redevelopment site, which includes a large public housing estate. The early planning and masterplan documents for Redfern-Waterloo made a commitment to delivering both social and affordable housing targets that were equivalent to around 50% of the development project. However, in the end, the Authority rolled the social and affordable housing into one 30% target, leaving little or no commitment to delivering affordable rental housing for key workers.

Shelter is therefore concerned over any lack of clarity, which would allow the State Planning Authority to renege on it stated commitment towards delivering affordable rental housing. Shelter would like to see a clearly defined target, aimed at delivering a reliable affordable housing outcome.

The Blackwattle Bay Strategic principle (11) supports the creation of a socially inclusive and affordable suburb.[3] In addition, the 'Blackwattle Bay - State Significant Development (SSD) June 2021 (Attachment 10: Explanation of Intended Effect point 2.8)' highlights the City of Sydney's existing affordable housing scheme, as well as its inclusionary zoning requirement, which enables affordable housing contributions. It also points to the *Eastern City District Plan's* affordable housing target of 5 to 10%.

Shelter NSW is pleased to see that the strategy supports site-specific provisions, including a contribution to affordable housing. However, the report refers to a target of only 5% of the total new residential gross floor area. Having made a strategic commitment in '*Towards our Greater Sydney 2056, 'A Metropolis of Three Cities'* and the *'Eastern City District Plan'* to deliver a minimum of 5-10%, we believe that the State Government should at the very least aim to deliver on an affordable housing target above 10%.

The report proposes that the contribution would be made either as dedicated affordable dwellings within the precinct or as a paid monetary contribution as follows;

[3] Revitalising Blackwattle Bay. NSW Government https://www.infrastructure.nsw.gov.au/media/2527/bays001-blackwattle-bay-consultation-a4-brochure-may2020_fa2_lr.pdf

- 2,175 sqm of affordable housing; or
- approximately $8.9m in monetary contributions towards affordable housing.

Based on land value in the surrounding suburbs, it is evident that a monetary contribution of around nine million would not provide enough funds for a not-for-profit community housing organisation to purchase land in the precinct or surrounding area.

City West Housing has indicated that the construction cost for a 2-bedroom unit in the Sydney City Local Government Area (LGA) is around $420,000, excluding land costs. Therefore, a nine-million-dollar contribution would provide enough funds to construct around 21 units, not including the cost of land. In light of this, Shelter is concerned that even a 10% monitory contribution target is unlikely to deliver any affordable housing units within the suburb or surrounding area. Nor will it address the housing needs of the approximately 5,600 employees filling new jobs within the suburb, especially those on lower incomes.

Recommendations

Noting the above areas of concern, Shelter NSW sees the delivery of affordable housing within the development precinct as vital. In order to facilitate this, Shelter NSW recommends;

- that a definition of affordable housing (including public and community housing) be included as essential infrastructure. This recognises that access to affordable housing is like any other form of necessary social infrastructure (as per *the Australian Infrastructure Audit 2019*) and it must be delivered as part of any vibrant and diverse city,
- that the Blackwattle Bay Strategy include an affordable housing dedication closer to a 25% target. As an absolute minimum, it need at least meet the stated target from the Government's regional plan *A Metropolis of Three Cities, The Eastern City District Plan (2018)* and *Sydney City Council Local Environmental Plan 2012* of 10% from the outset.
- that the Authority support a joint venture arrangement that includes affordable housing. This could be a collaboration between a not-for-profit Community Housing organisation, Landcom or the NSW Land and Housing Corporation (NSWLAHC),
- that the Authority consider an affordable housing contribution based on the dedication of land within the Blackwattle Bay area,
- that the Authority consider dedicating land to affordable housing under a 99-year lease agreement,
- that a memorandum of understanding be created, linked with any affordable housing financial contribution, that the affordable rental housing be delivered locally.

Finally, to ensure that affordable housing is delivered within the Blackwattle Bay precinct, Shelter NSW recommends that the Strategy identify Government-owned land on which affordable housing joint venture projects can be delivered. Collaboration with key agencies such as Landcom, NSW Land and Housing Corporation or local not-for-profit community housing organisations can facilitate this.

References

Blackwattle Bay State Significant Precinct Study (June 2021)
https://infrastructure.nsw.gov.au/blackwattlebay

City of Sydney Local Housing Strategy (2020)
https://www.cityofsydney.nsw.gov.au/strategic-land-use-plans/local-housing-strategy#:~:text=Housing%20growth%20continues%20in%20the,to%20be%20built%20by%202036.&text=The%20local%20housing%20strategy%20was,all%20housing%20strategies%20across%20NSW.

Elton Consulting, *Master Planning the Bays Market District Draft Masterplan Principles Consultation Report*, Client: Urban Growth NSW (25 October 2017)
https://www.infrastructure.nsw.gov.au/media/2199/final-report-the-bays-market-district-masterplan-principles-251017.pdf

The Bays Precinct Sydney Transformation Plan, Urban Growth NSW (October 2015)
WWW.thebaysydeny.com.au

Revitalising Blackwattle Bay, NSW Government (2020)
https://www.infrastructure.nsw.gov.au/media/2527/bays001-blackwattle-bay-consultation-a4-brochure-may2020_fa2_lr.pdf

Gurran, N., Gilbert, C., Gibb, K., van den Nouwelant, R., James, A. & Phibbs, P. (2018) *Supporting affordable housing supply: inclusionary planning in new and renewing communities*, AHURI Final Report No. 297, Australian Housing and Urban Research Institute Limited: Melbourne

Phibbs, P. & King, L. A. (2018), *Potential affordable dwelling yields from a NSW inclusionary zoning scheme*, Report prepared for Shelter NSW, Shelter NSW: Sydney

O'Rourke, Jim and McNab, Heather, *Rough sleepers Jim in Sydney's Wentworth Park kicked out by NSW Government Authorities*. October 12, 2017. The Daily Telegraph Inner West Courier Inner City. https://www.dailytelegraph.com.au/newslocal/inner-west/rough-sleepers-in-sydneys-wentworth-park-kicked-out-by-nsw-government-authorities/news-story/f8c3bb6bc8a2085984e6119ce90f8fca.

Bastian, Isabelle, *Homeless hounded in park*, October 2017
https://cityhubsydney.com.au/2017/10/homeless-hounded-in-park/

The Bays Station, NSW Government
https://www.sydneymetro.info/station/bays-station

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Glebe 2037

Submission uploaded.

Blackwattle Bay Redevelopment. An Open Submission by William Miller Architect Glebe 100821

Blackwattle Bay Redevelopment. An Open Submission by William Miller, Architect, Glebe 100821

1. I offer this submission as a resident of Glebe drawing on my background as an architect.

2. The Blackwattle Bay SSP Study (The Study) is a skilful technical report implementing the NSW Government's strategic objectives. However, the Government's objectives are flawed at the highest level for failing to address any of the needs of the most affected populations of Pyrmont, Ultimo and Glebe.

3. Of direct relevance is the very evident need of the peoples of those suburbs for green open space. Table 1 line 6 identifies a current shortfall equating to 80% below the green space reckoned as minima by the NSW Department of Planning's guidelines (line 4). This and the apparent infeasibility of satisfying basic urban planning principles is sufficient reason for the Government of NSW to realign its priorites and objectives and zone the entire area from the Fish Market to Waterfront Park, as a public park. My argument for the above is presented below.

4. An over-arching objective of government is to secure the safety, health and well being of the people everywhere (in this case especially, the residents and workers of Pyrmont, Ultimo and Glebe). This is any government's highest priority, the single most important objective against which all options for urban development must be assessed. It should also be accorded the same status in an urban planner's and architect's code of practice.

5. The importance of green space in delivering the above objectives in urban areas is so widely recognised that governments everywhere promulgate guidelines relating the area of green open space provison to the population. The NSW guideline[1] is 2.83 hectares per 1000 persons. Yet the "The Study" addresses open space provison for the development area only; it ignores the needs of the residents of Pyrmont, Ultimo and Glebe; see Table 1.

Table 1

Suburb	Present Pop. (thou)	Space Req (ha) @ 2.83ha/thou.pop.	Status
1 Pyrmont	14.6	41	Est. pop at 2020 [2]
2 Ultimo	10.0	28	ditto
3 Glebe	19.0	54	ditto
4 Total req	43.6	123	5 times the total available
5 Total avail.	na	Total ha available 24	Jubilee, Bicentennial, Federal and Wentworth Parks approximately
6 Present Shortfall	na	99*	The development area at the present Fish Market in the order of 4-6 ha.

* roughly equivalent to 99 rugby fields.

6. Table 1 addresses the present only, by way of example. The present shortfall in open space provision will increase with every increase in the population.

7. **As to the residential towers:** they are the most energy intensive, highest lifetime cost, highest carbon footprint, least accessible, least adaptable enclosure of floor space. Moreover they have no place on shore-fronts anywhere. The proposed 45 storey towers with 1550 apartments may attract the highest sale price for NSW Treasury but will impose the highest cost on the the community. This is cost-shifting accountancy at work, not economics. Given the open space shortfall the proposed development is outrageous. This is a strategy antithetical to good governance; declaring it a State Significant Project is an egregious abuse of power, disgracing the NSW Government, Infrastsructure NSW, the Department of Planning and the Government Architect, all of whom, in this proposal, have wilfully neglected their responsibility to the people of Pyrmont Utimo and Glebe.

8. There is no room for any kind of building on this site; the entire area is required as parkland and the NSW Government should zone it as such with no structure bigger than barbecues nor more extensive than pathways.

William Miller, Glebe NSW
August 10 2021
william.miller42@gmail.com
https://sites.google.com/site/williammillerarchitect

1 Recreation and Open Space Planning Guidelines for Local Government Dept of Planning NSW
2 Website: https://profile.id.com.au/sydney/population?WebID=180

181971

Mortimer

Pyrmont 2009

Submission on Blackwattle Bay State Significant Precinct Study

Council of Ultimo/Pyrmont Associations (CUPA)

The proposal to develop Blackwattle Bay has many attractive features. However this proposal should not proceed before the Pyrmont Peninsula Place Strategy is finalised.

Sydney Harbour is one of the finest harbours in the world, and it is the governmentâ€™s intention to create a world-class fish market precinct. This will not be achieved by this Precinct Plan. The overall impression created by the plan is that the government needs to maximise its income by enabling developers to build massive towers on the foreshore and sell this property to the highest bidder. The towers will create a wall of buildings blocking the surrounding area, overshadow much of the foreshore and surrounding streets, and produce wind tunnels on the foreshore walk and between the buildings.

The proposals to amend existing planning legislation will enable these towers to be built without further community consultation, and deny affected community members any role in future plans for the precinct.

Blackwattle Bay needs a master plan

Why is there no Master Plan for the area - including future use of the Glebe Island Bridge for pedestrians and active transport? Glebe Island Bridge is a critical asset â€“ it needs to be brought back to life for cycling and pedestrians. The Pyrmont Peninsula Place Strategy assured us of a planned strategy for the whole area. Now we are asked to accept piecemeal planning without considering increased traffic and parking, no indication of how better public transport will be introduced, and no reference to public infrastructure like community, cultural, sporting and leisure facilities, affordable housing, educational, medical and aged care facilities, a menâ€™s shed, a womenâ€™s shelter.

Blackwattle Bay should not be an extension of the CBD

The assumption that Blackwattle Bay should be an extension of the CBD is unreasonable and inappropriate. Pyrmont and Ultimo are primarily residential, and already among the most densely populated suburbs in Australia; and Blackwattle Bay forms a bridge to Glebe. All have a long history as residential suburbs: changing the planning regulations to enable the bay to accommodate enormous commercial and residential towers is much more about allowing developers to exploit the harbour foreshore than any public benefit. Planners have developed Darling Harbour as a wall between the city and these suburbs.

Local residents should not have to pay for a Sydney/NSW-wide facility

The huge towers are presumably to help pay for the new fish market. This development will benefit the whole of Sydney, support the entire seafood industry of New South Wales, and provide great opportunities for interstate and international tourism, boosting the stateâ€™s economy. Pyrmont residents should not suffer loss of views of the harbour, overshadowing and wind tunnels between towers as they walk around the harbour foreshore. Benefits for the Stateâ€™s economy should be paid for by the whole State.

Developer contributions are needed for vital local infrastructure

The proposal that developer contributions go into the state coffers will jeopardise community benefit. Increased number of residents and workers will require more social infrastructure, including community facilities, schools and medical facilities. Developer contributions should not be directed to other areas, but will be needed by our community, and expenditure of these funds must be transparent and accountable.

The community facilities described in the plan are completely unfunded.

Over-tall towers will form a wall between Pyrmont/Ultimo and the harbour and between Pyrmont and Glebe

A principle of the Pyrmont Peninsula Place Strategy is that new buildings should respect the character of the surrounding area. At most towers should be no higher than the tallest buildings in Jacksons Landing. They will also create a wall between Glebe and Pyrmont. View sharing is an equitable principle in residential areas. These towers will prevent sharing views of Blackwattle Bay from surrounding areas.

Exposure to air and noise pollution

The proposal recognises that the proximity to a busy road network and the Anzac Bridge will involve extreme vibration, noise and air pollution. Windows will need to be closed to manage noise, ruling out natural ventilation.

Overshadowing and wind in parks, walkways and surrounding area

Sunlight in new parks is less than the City of Sydneyâ€™s requirements. Few, if any, streets will have the sunlight required for tree growth. Overshadowing of existing dwellings south of Pyrmont Bridge Road is not adequately addressed. Excessive wind between tall towers will make walkways unsafe and seating uncomfortable. Wind and overshadowing throughout the precinct will inhibit tree growth. Trees are vital for purifying air, cooling the ambient temperature, and contributing to peopleâ€™s mental health. The promenade will be in shade from 6.30-10am â€“ hardly a â€œworld-classâ€ harbour foreshore promenade!

2,800 more residents should not be added to an already dense population

Excessive height and girth of residential towers will bring too many new residents. Traffic on surrounding roads will be increased in a network leading to the Anzac Bridge, which traffic engineers say is already at capacity.

Residents are entitled to see Blackwattle Bay

Blackwattle Bay is a tranquil and beautiful cove, with a long indigenous and settler history. Plans should enable as many residents as possible to enjoy their proximity to Sydney Harbour. The proposed towers will steal this outlook from most of the surrounding area, for the benefit of new residents who can afford to buy into these towers. Not only will they block views, but they will also block sunlight for much of the day for large stretches of nearby land, including the proposed foreshore walkway and community open space, and create wind tunnels between them.

Traffic will increase to unmanageable levels

Traffic in this road network is already very congested. There are no proposals to increase public transport. The Pyrmont Metro station is years away and at a distance; no more light rail stations are being considered; there are no current plans for a ferry service; and the plan for parking is to have no more than the existing number of spaces. Most visitors to the fish market come to buy seafood. Very few will want to carry their seafood esky home on the light rail, the metro, the ferry or the bus, so the surrounding streets will have to accommodate increased parking, creating further congestion and denying parking for residents.

Private landowners will benefit disproportionately

Once the land along Bank Street is rezoned, Poulos Bros Seafoods Pty Limited, Celestino/Baiada Poultry Pty Ltd. and Hanson Australia Holdings Proprietary Limited will benefit hugely from sale of their land. The higher the new buildings on this stretch of land, the more disadvantaged the current residents. How does this fit the approach advocated in the plan: â€œâ€¦ development potential to be distributed fairly & impartiallyâ€?

More open space and sports facilities are needed

Pyrmont has several parks, but no full-size courts for any team sport. Apart from building fitness, team sports build a sense of belonging, working together, adherence to rules. Maybanke Recreation Centre must be developed into a purpose-built sport and active recreation centre, which will serve the community and the wider Inner West. Developer contributions from Blackwattle Bay should be dedicated to this much needed facility. 94% of housing in Pyrmont is apartments, needing much more outdoor space for children than families who live in houses with backyards. We cannot just rely on Wentworth Park which is shared by Pyrmont, Ultimo and Glebe. As soon as the current greyhound lease expires, it should be devoted to local sporting activities, with the possibility of including a high school, and perhaps extending the Ultimo Primary School when this is needed.

What is the health benefit to our community?

This development should provide an excellent net health benefit. The proposal promises a world class, 5 star precinct to benefit residents, workers and visitors. But overshadowing and wind will prevent it reaching its potential for those wanting to walk, run, cycle, sit or relax, whether for physical or mental health.

Some urban heat and mental health impacts can be mitigated by biodiversity - trees make it cool to walk. With proper planning we could have majestic tree canopies with birds beside a world class Australian city foreshore walkway.

Proposals to amend planning legislation deny democratic planning

The state government undertook to return planning powers to the people! What is proposed is diametrically opposed. Current legislation in the Sydney Regional Environmental Plan:

SREPP Section 25 Foreshore and waterways scenic quality

(a) The scale, form, design and siting of any building should be based on an analysis of:

(i) The land on which it is to be erected, and

(ii) The adjoining land, and

(iii) The likely future character of the locality.

(b) Development should maintain, protect and enhance the unique visual qualities of Sydney Harbour and its islands, foreshores and tributaries.

(c) The cumulative impact of water-based development should not detract from the character and adjoining foreshores.

SREPP Section 26 Maintenance, protection and enhancement of views

(a) Development should maintain, protect and enhance views (including night views) to and from Sydney Harbour,

(b) Development should minimise any adverse impacts on views and vistas to and from public places, landmarks and heritage items,

(c) The cumulative impact of development on views should be minimised.

The Departmentâ€™s aim is to repeal existing legislation so as to permit creation of excessively large buildings along the foreshore of Blackwattle Bay. This will contravene much of the established requirements for planning in Sydney, and especially around Sydney Harbour.

It also proposes to limit the approval of major development proposals (>$10 million) to the control of a single Planning Secretary. This may speed up decisions about significant developments, but opens the door for influence by vested interests, and denies citizens the right to participate in any consultation and decision-making.

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Foreshore promenade must be 30m wide

Completion of the foreshore promenade around the harbour is one of the most important tourist facilities in Sydney. It must be 30m wide all the way. Given the anticipated number of visitors and the need for residents in surrounding suburbs for more open space - pedestrians, cyclists, joggers, dog-walkers, families with prams, kids on bikes and scooters â€“ squeezing the walkway back to 10m at some stages will create serious congestion and conflict. In particular it will not allow for physical distancing at times like the present pandemic. The lack of separated cycleways and walkways is already a problem along the Glebe foreshore. Some Glebe residents are currently avoiding the Jubilee Park foreshore walk out of concern for overcrowding.

Consider and respect our history:

In 1831 under Governor Darling, the Surveyor-General of the colony of NSW Thomas Mitchell introduced Clause 14 to the NSW Land Regulations [Syd Gaz 4 Aug 1831]: â€œNo land within one hundred feet of the high water mark on the sea coast, harbours, bays, or inlets, is to be considered open to purchase, unless for the purposes of commerce or navigation.â€

Indigenous history, heritage and culture must be honoured

The plan calls for a significant representation of indigenous history, heritage and culture. This will only be achieved by including housing for Aboriginal people who can engage with the local community, and contribute to the proposed activities, for example in the gathering circle. There is an opportunity to build a permanent (world class, award winning) museum dedicated to and celebrating Indigenous life in and around the Harbour. This would be a tourist attraction to rival the new Fish Market and provide a much needed educational resource close to mass transit facilities. The Museum would also provide an employment hub for Aboriginal workers and families, some of whom could afford to live in their own homes and others given priority for affordable housing. It could also house a cultural/learning centre for students and the community to show where they belong. There must be a permanent Indigenous presence. Otherwise they are unlikely to have any connection with people who can afford luxury apartments in high-rise buildings on the harbour foreshore.

Genuine commitment to public and affordable housing

Key workers need to be close to the city. The plan proposes 5% of the housing for nurses, teachers, community support workers, police, ambulance and emergency officers, delivery personnel and cleaners. This is 78 apartments and will not accommodate all the key workers who are needed. Further the plan suggests that funds could be diverted to other places, effectively removing the governmentâ€™s commitment to this essential housing. Many other jurisdictions have much greater commitments to housing key workers â€“ eg the City of Sydney advocates 25% of housing to be affordable on government-owned land. We support the City West Housing model whereby tenancies enable people of different income levels to stay in the same place.

The provision to allow monetary contributions in lieu of direct investment in affordable housing offers no guarantee of affordable housing in Blackwattle Bay.

More public open space needed

The amount of public open space proposed is only 30%, and much of it is in shade under the approaches to the Anzac Bridge. Planning for Barangaroo allocated 50% open space. Pyrmont is 94% apartments. Ultimo is getting more high-rise. School-age children attend a high-rise primary school. Wentworth Park is shared between 3 suburbs. There is a much greater need for active playing space. Kids and young adults need space to kick a ball, run around â€“ vital for their mental and physical health.

Community consultation

The documentation includes this statement:

The principles for a future Blackwattle Bay were formed through extensive community consultation in August 2017. These were further developed in 2019, together with a vision for the precinct. These have guided the development of the Precinct Plan and will continue to guide future development proposals within the Study Area.

1. Improve access to Blackwattle Bay, the foreshore and water activities for all users.

2. Minimise additional shadowing to Wentworth Park and Glebe Foreshore (in mid-winter) and create new places with comfortable conditions for people to enjoy.

3. Pursue leading edge sustainability outcomes including climate change resilience, improved water quality and restoration of natural ecosystems.

4. Prioritise movement by walking, cycling and public transport.

5. Balance diverse traffic movement and parking needs for all users.

6. Link the Blackwattle Bay precinct to the City, Glebe Island and White Bay and other surrounding communities and attractors.

7. Mandate Design Excellence in the public and private domain.

8. Integrate housing, employment and mixed uses to create a vibrant, walkable, mixed use precinct on the city's edge.

9. Maintain and enhance water uses and activities.

10. Allow for co-existence and evolution of land uses over time.

11. A place for everyone that is inviting, unique in character and socially inclusive.

12. Expand the range of recreational, community and cultural facilities.

13. Plan for the future community's education, health, social and cultural needs.

14. Deliver development that is economically, socially, culturally and environmentally viable.

15. Embed and interpret the morphology, heritage and culture of the site to create an authentic and site responsive place.

16. Foster social and cultural understanding and respect to heal and grow relationships.

As we have shown, most of these principles have been abandoned. We urge the government to go back to the drawing board, and create a master plan for Blackwattle Bay that respects the above principles, and proposes a genuine world class precinct that will accommodate the needs of our community and build a Blackwattle Bay precinct of which Sydney and New South Wales can be proud.

Mary Mortimer OAM

Convenor, Council of Ultimo Pyrmont Associations (CUPA)

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(Also attached as a pdf)

Submission on Blackwattle Bay State Significant Precinct Study
Council of Ultimo/Pyrmont Associations (CUPA)

The proposal to develop Blackwattle Bay has many attractive features. However this proposal should not proceed before the Pyrmont Peninsula Place Strategy is finalised.
Sydney Harbour is one of the finest harbours in the world, and it is the government's intention to create a world-class fish market precinct. **This will not be achieved by this Precinct Plan**. The overall impression created by the plan is that the government needs to maximise its income by enabling developers to build massive towers on the foreshore and sell this property to the highest bidder. The towers will create a wall of buildings blocking the surrounding area, overshadow much of the foreshore and surrounding streets, and produce wind tunnels on the foreshore walk and between the buildings.
The proposals to amend existing planning legislation will enable these towers to be built without further community consultation, and deny affected community members any role in future plans for the precinct.

Blackwattle Bay needs a master plan
Why is there no Master Plan for the area - including future use of the Glebe Island Bridge for pedestrians and active transport? Glebe Island Bridge is a critical asset – it needs to be brought back to life for cycling and pedestrians. The Pyrmont Peninsula Place Strategy assured us of a planned strategy for the whole area. Now we are asked to accept piecemeal planning without considering increased traffic and parking, no indication of how better public transport will be introduced, and no reference to public infrastructure like community, cultural, sporting and leisure facilities, affordable housing, educational, medical and aged care facilities, a men's shed, a women's shelter.

Blackwattle Bay should not be an extension of the CBD
The assumption that Blackwattle Bay should be an extension of the CBD is unreasonable and inappropriate. Pyrmont and Ultimo are primarily residential, and already among the most densely populated suburbs in Australia; and Blackwattle Bay forms a bridge to Glebe. All have a long history as residential suburbs: changing the planning regulations to enable the bay to accommodate enormous commercial and residential towers is much more about allowing developers to exploit the harbour foreshore than any public benefit. Planners have developed Darling Harbour as a wall between the city and these suburbs.

Local residents should not have to pay for a Sydney/NSW-wide facility
The huge towers are presumably to help pay for the new fish market. This development will benefit the whole of Sydney, support the entire seafood industry of New South Wales, and provide great opportunities for interstate and international tourism, boosting the state's economy. Pyrmont residents should not suffer loss of views of the harbour, overshadowing and wind tunnels between towers as they walk around the harbour foreshore. Benefits for the State's economy should be paid for by the whole State.

Developer contributions are needed for vital local infrastructure
The proposal that developer contributions go into the state coffers will jeopardise community benefit. Increased number of residents and workers will require more social infrastructure, including community facilities, schools and medical facilities. Developer contributions should not be directed to other areas, but will be needed by our community, and expenditure of these funds must be transparent and accountable.
The community facilities described in the plan are completely unfunded.

Over-tall towers will form a wall between Pyrmont/Ultimo and the harbour and between Pyrmont and Glebe
A principle of the Pyrmont Peninsula Place Strategy is that new buildings should respect the character of the surrounding area. At most towers should be no higher than the tallest buildings in Jacksons Landing. They will also create a wall between Glebe and Pyrmont. View sharing is an equitable principle in residential areas. These towers will prevent sharing views of Blackwattle Bay from surrounding areas.

Exposure to air and noise pollution
The proposal recognises that the proximity to a busy road network and the Anzac Bridge will involve extreme vibration, noise and air pollution. Windows will need to be closed to manage noise, ruling out natural ventilation.

Overshadowing and wind in parks, walkways and surrounding area
Sunlight in new parks is less than the City of Sydney's requirements. Few, if any, streets will have the sunlight required for tree growth. Overshadowing of existing dwellings south of Pyrmont Bridge Road is not adequately addressed. Excessive wind between tall towers will make walkways unsafe and seating uncomfortable. Wind and overshadowing throughout the precinct will inhibit tree growth. Trees are vital for purifying air, cooling the ambient temperature, and contributing to people's mental health. The promenade will be in shade from 6.30-10am – hardly a "world-class" harbour foreshore promenade!

2,800 more residents should not be added to an already dense population
Excessive height and girth of residential towers will bring too many new residents. Traffic on surrounding roads will be increased in a network leading to the Anzac Bridge, which traffic engineers say is already at capacity.

Residents are entitled to see Blackwattle Bay
Blackwattle Bay is a tranquil and beautiful cove, with a long indigenous and settler history. Plans should enable as many residents as possible to enjoy their proximity to Sydney Harbour. The proposed towers will steal this outlook from most of the surrounding area, for the benefit of new residents who can afford to buy into these towers. Not only will they block views, but they will also block sunlight for much of the day for large stretches of nearby land, including the proposed foreshore walkway and community open space, and create wind tunnels between them.

Traffic will increase to unmanageable levels
Traffic in this road network is already very congested. There are no proposals to increase public transport. The Pyrmont Metro station is years away and at a distance; no more light rail stations are being considered; there are no current plans for a ferry service; and the plan for parking is to have no more than the existing number of spaces. Most visitors to the fish market come to buy seafood. Very few will want to carry their seafood esky home on the light rail, the metro, the ferry or the bus, so the surrounding streets will have to accommodate increased parking, creating further congestion and denying parking for residents.

Private landowners will benefit disproportionately
Once the land along Bank Street is rezoned, Poulos Bros Seafoods Pty Limited, Celestino/Baiada Poultry Pty Ltd. and Hanson Australia Holdings Proprietary Limited will benefit hugely from sale of their land. The higher the new buildings on this stretch of land, the more disadvantaged the current residents. How does this fit the approach advocated in the plan: "… development potential to be distributed fairly & impartially"?

More open space and sports facilities are needed
Pyrmont has several parks, but no full-size courts for any team sport. Apart from building fitness, team sports build a sense of belonging, working together, adherence to rules. Maybanke Recreation Centre must be developed into a purpose-built sport and active recreation centre, which will serve the community and the wider Inner West. Developer contributions from Blackwattle Bay should be dedicated to this much needed facility. 94% of housing in Pyrmont is apartments, needing much more outdoor space for children than families who live in houses with backyards. We cannot just rely on Wentworth Park which is shared by Pyrmont, Ultimo and Glebe. As soon as the current greyhound lease expires, it should be devoted to local sporting activities, with the possibility of including a high school, and perhaps extending the Ultimo Primary School when this is needed.

What is the health benefit to our community?
This development should provide an excellent net health benefit. The proposal promises a world class, 5 star precinct to benefit residents, workers and visitors. But overshadowing and wind will prevent it reaching its potential for those wanting to walk, run, cycle, sit or relax, whether for physical or mental health.
Some urban heat and mental health impacts can be mitigated by biodiversity - trees make it cool to walk. With proper planning we could have majestic tree canopies with birds beside a world class Australian city foreshore walkway.

Proposals to amend planning legislation deny democratic planning
The state government undertook to return planning powers to the people! What is proposed is diametrically opposed. Current legislation in the Sydney Regional Environmental Plan:
SREPP Section 25 Foreshore and waterways scenic quality
(a) The scale, form, design and siting of any building should be based on an analysis of:
    (i) The land on which it is to be erected, and
    (ii) The adjoining land, and
    (iii) The likely future character of the locality.
(b) Development should maintain, protect and enhance the unique visual qualities of Sydney Harbour and its islands, foreshores and tributaries.
(c) The cumulative impact of water-based development should not detract from the character and adjoining foreshores.
SREPP Section 26 Maintenance, protection and enhancement of views
(a) Development should maintain, protect and enhance views (including night views) to and from Sydney Harbour,
(b) Development should minimise any adverse impacts on views and vistas to and from public places, landmarks and heritage items,
(c) The cumulative impact of development on views should be minimised.

The Department's aim is to repeal existing legislation so as to permit creation of excessively large buildings along the foreshore of Blackwattle Bay. This will contravene much of the established requirements for planning in Sydney, and especially around Sydney Harbour.

It also proposes to limit the approval of major development proposals (>$10 million) to the control of a single Planning Secretary. This may speed up decisions about significant developments, but opens the door for influence by vested interests, and denies citizens the right to participate in any consultation and decision-making.

Foreshore promenade must be 30m wide

Completion of the foreshore promenade around the harbour is one of the most important tourist facilities in Sydney. It must be 30m wide all the way. Given the anticipated number of visitors and the need for residents in surrounding suburbs for more open space - pedestrians, cyclists, joggers, dog-walkers, families with prams, kids on bikes and scooters – squeezing the walkway back to 10m at some stages will create serious congestion and conflict. In particular it will not allow for physical distancing at times like the present pandemic. The lack of separated cycleways and walkways is already a problem along the Glebe foreshore. Some Glebe residents are currently avoiding the Jubilee Park foreshore walk out of concern for overcrowding.

Consider and respect our history:

In 1831 under Governor Darling, the Surveyor-General of the colony of NSW Thomas Mitchell introduced Clause 14 to the NSW Land Regulations [Syd Gaz 4 Aug 1831]: "No land within one hundred feet of the high water mark on the sea coast, harbours, bays, or inlets, is to be considered open to purchase, unless for the purposes of commerce or navigation."

Indigenous history, heritage and culture must be honoured

The plan calls for a significant representation of indigenous history, heritage and culture. This will only be achieved by including housing for Aboriginal people who can engage with the local community, and contribute to the proposed activities, for example in the gathering circle. There is an opportunity to build a permanent (world class, award winning) museum dedicated to and celebrating Indigenous life in and around the Harbour. This would be a tourist attraction to rival the new Fish Market and provide a much needed educational resource close to mass transit facilities. The Museum would also provide an employment hub for Aboriginal workers and families, some of whom could afford to live in their own homes and others given priority for affordable housing. It could also house a cultural/learning centre for students and the community to show where they belong. There must be a permanent Indigenous presence. Otherwise they are unlikely to have any connection with people who can afford luxury apartments in high-rise buildings on the harbour foreshore.

Genuine commitment to public and affordable housing

Key workers need to be close to the city. The plan proposes 5% of the housing for nurses, teachers, community support workers, police, ambulance and emergency officers, delivery personnel and cleaners. This is 78 apartments and will not accommodate all the key workers who are needed. Further the plan suggests that funds could be diverted to other places, effectively removing the government's commitment to this essential housing. Many other jurisdictions have much greater commitments to housing key workers – eg the City of Sydney advocates 25% of housing to be affordable on government-owned land. We support the City West Housing model whereby tenancies enable people of different income levels to stay in the same place.

The provision to allow monetary contributions in lieu of direct investment in affordable housing offers no guarantee of affordable housing in Blackwattle Bay.

More public open space needed

The amount of public open space proposed is only 30%, and much of it is in shade under the approaches to the Anzac Bridge. Planning for Barangaroo allocated 50% open space. Pyrmont is 94% apartments. Ultimo is getting more high-rise. School-age children attend a high-rise primary school. Wentworth Park is shared between 3 suburbs. There is a much greater need for active playing space. Kids and young adults need space to kick a ball, run around – vital for their mental and physical health.

Community consultation

The documentation includes this statement:

The principles for a future Blackwattle Bay were formed through extensive community consultation in August 2017. These were further developed in 2019, together with a vision for the precinct. These have guided the development of the Precinct Plan and will continue to guide future development proposals within the Study Area.

1. Improve access to Blackwattle Bay, the foreshore and water activities for all users.
2. Minimise additional shadowing to Wentworth Park and Glebe Foreshore (in mid-winter) and create new places with comfortable conditions for people to enjoy.
3. Pursue leading edge sustainability outcomes including climate change resilience, improved water quality and restoration of natural ecosystems.
4. Prioritise movement by walking, cycling and public transport.
5. Balance diverse traffic movement and parking needs for all users.
6. Link the Blackwattle Bay precinct to the City, Glebe Island and White Bay and other surrounding communities and attractors.
7. Mandate Design Excellence in the public and private domain.
8. Integrate housing, employment and mixed uses to create a vibrant, walkable, mixed use precinct on the city's edge.
9. Maintain and enhance water uses and activities.
10. Allow for co-existence and evolution of land uses over time.
11. A place for everyone that is inviting, unique in character and socially inclusive.
12. Expand the range of recreational, community and cultural facilities.
13. Plan for the future community's education, health, social and cultural needs.
14. Deliver development that is economically, socially, culturally and environmentally viable.
15. Embed and interpret the morphology, heritage and culture of the site to create an authentic and site responsive place.
16. Foster social and cultural understanding and respect to heal and grow relationships.

As we have shown, most of these principles have been abandoned. We urge the government to go back to the drawing board, and create a master plan for Blackwattle Bay that respects the above principles, and proposes a genuine world class precinct that will accommodate the needs of our community and build a Blackwattle Bay precinct of which Sydney and New South Wales can be proud.

Mary Mortimer OAM
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0410 679 204

175101

Newton

Glebe

I have attached a document

Development of Blackwattle Bay

Thank you for the opportunity to comment on this development. I attended all the webinars and have read many documents. I have lived in Glebe for 40 years and involved in the Glebe Chamber of Commerce for 20 years so have had a long connection to the area.

First, I question the 'state significant' tag on this site. The Fishmarket is state significant as a food wholesaler and distribution hub, but this land is nothing but a development opportunity where government changes the controls and becomes the sole arbiter.

This plan by incorporation 45 storey buildings is a catastrophe for the inner west. These buildings will overshadow the new Fishmarket with its solar panel roof and shadow the foreshore park that this development continues to call a benefit.

In an environment that needs more open space and clean air putting residents 20 metres above a freeway is not good planning. The experts tell us that emissions drop at that level but noise will still travel (I hear the construction of the fishmarkets). Forcing 1500 units to live off air conditioning, is not sustainable.

The proposed height will also take away the magic of the Anzac bridge by overpowering it to matchbox size.

The Glebe Island Bridge is the perfect link for the bay, but this is not included in either this plan or the white bay plan. Pyrmont bridge proves to be a vital link in Darling Harbour but unfortunately no one can see that Glebe Island could be the same as pedestrian and cycle route to city. The Glebe Island Bridge should be started now as a priority, its benefits, including for white bay shipping terminal are a no brainer!!!

This bay is a recreational bay with two old and significant rowing clubs both have produced many Olympians and the Glebe Rowing club being the oldest in Australia. The rowers have lived with the fishmarkets for some time but the pleasure boats and charter companies, if increase, will hinder their activity, these institutions are vital for our community and inner-city life.

With that many residents there does not seem to be a primary school or childcare included.

Children from Pyrmont already travel to Glebe to go to school. Childcare centres are already full.

Disturbing to see no public parking and very little resident parking. Just because you live in the city doesn't mean you are not a shift worker in Bankstown, therefore needing a car. It is a reality that many decide to live where they like to socialise not necessarily work.

The open space in the development is under the Freeway, not a very healthy environment.

What could happen is a rezoning for more open space, any development that close to the freeway is unsustainable the units already there do not use balconies or open windows. Make a true public statement and open it up to the people of Sydney.

Christine Newton

218 Glebe Point Road

Glebe 2037

177686

Pickles

Pyrmont 2009

Please see attached submission.

Andrew Pickles

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17 August 2021

Department of Planning, Industry and Environment
Blackwattle Bay redevelopment submission
Locked Bag 5022,
Parramatta NSW 2124

Dear Sir/Madam,

Re: Blackwattle Bay State Significant Precinct Study

I make the following submissions concerning this study:

Strategic Planning

Once again, this proposal represents the same 'cart before horse' planning that has been prevalent in NSW since the 1960's. Nothing ever seems to be learned it seems. We were led to believe the whole purpose of the Pyrmont Peninsula Place Strategy (PPPS) was to streamline and rationalise the planning controls for the whole peninsula. Of course, that idea seems to have been abandoned by bringing forward proposals like this that have little regard to that strategy and do nothing to advance the co-ordination of planning controls across the peninsula.

The Blackwattle Bay priorities under the PPPS includes "to prioritise commercial development over residential". The proposal here is clearly contrary to that principle. The towers in Area 3 are never going to be a suitable location for tall CBD commercial buildings. The demand for commercial space in Pyrmont has been, and will no doubt continue to be, geared to technology and knowledge based industries which demand bigger more flexible floor plates in lower rise buildings. The tower forms are only ever likely to be residential and the scale of what is proposed will only serve to overwhelm the commercial uses.

Area 3- CBD Scale

The scale of what is proposed in this plan is hardly what it claims, which is for Pyrmont to be a transition between the CBD and Glebe. On the contrary, what is proposed, particularly in Area 3, resembles the scale of towers in the CBD. Three towers of between 29 and 46 storeys (or 21-34 storeys over 8 storey street wall) are entirely consistent with the scale of mid to high rise buildings in the CBD. Although not

as high as the taller of the International Towers at Barangaroo, these towers will exceed most of the towers on the western fringe of the CBD. In contrast, Glebe has heights of generally 2-3 storeys, with some scattered buildings of 4-6 storeys. 29-46 storeys hardly represent a transition.

A transitional scale is already established by the height of the Sofitel at Darling Harbour, The Star and the buildings on Distillery Hill. My building, the tallest in Jackson's Landing, is 21 storeys above a 3-4 storey podium. That might represent, subject to solar modelling, an appropriate scale.

The overshadowing generated by the towers located at the southern end of the site is significant. While the shadow diagrams are intended to demonstrate no impact on Wentworth Park and new waterfront open space at noon and 3 pm, the absence of 1 pm or 2 pm shadows (see p 111, Fig 41) makes it difficult to verify whether this has been achieved.

In addition, the shadowing has endeavoured to take into account the impact on immediately adjoining residences, it has taken no account of new residences to be built on the former quarry site on the corner of Wattle, Fig and Jones Streets, recently the subject of an approved concept DA for principally residential development. By my estimate, the 1 pm to 2 pm shadows cast by the proposed towers would preclude that site from achieving acceptable sunlight under SEPP 65. In addition, the towers will overshadow heritage terraces on Jones St and loom over Fig St Park.

The so-called 'transferrable principles' from other international examples of re-development precincts also highlight the inappropriate scale. Barangaroo and Elizabeth Quay Perth are plainly CBD locations and have a CBD scale. They do not support the placement of towers of this scale in 'transitional' Pyrmont. The Battersea Power station and HafenCity in Hamburg, on the other hand, are more appropriate and demonstrate everything that is wrong with the proposal. They have a lower scale and respect the historical portside typology in Hamburg's case and the scale of the industrial heritage at Battersea. In the Pyrmont context, the development of the Fish Market site should be more reflective of the typology and scale of the industrial warehouse buildings of central and southern Pyrmont and thus, more like HafenCity or Battersea.

Another precinct of which I am familiar, and would be a suitable reference point, is the London Dock development at the old Murdoch print works in London. While it has a few tower forms of up to 20 storeys, the block like forms combined with lower scale buildings of a style like HafenCity is eminently suitable for its waterfront heritage context of Wapping in East London.

Fundamentally, the towers in Area 3 are completely overscale and out of character with the whole of the Pyrmont Peninsula let alone Glebe.

<u>Area 2- Walls of towers</u>

While the scale of the towers proposed in Area 2 are more consistent with a transitional scale, their location, hemmed in between the waterfront and the approaches to the Anzac Bridge will create a very uncharacteristic and unpleasant wall of towers. Their envelopes are too close together and there are too many of them. Three towers with larger gaps for view lines through them would be more

appropriate, though for the following reason I question whether tower forms are at all suitable on these sites.

The towers in Area 2 are nominated for mixed use, but their proximity to the approaches to the Anzac Bridge, where traffic on the closest westbound lanes must accelerate uphill, will make these towers generally unsuitable for residential development. One only needs to see the similar relationship to the old Meriton development on the corner of Bank St and Quarry Master drive on the opposite side of the Anzac Bridge to see what an undesirable outcome this is. These apartments are thoroughly undesirable and affected by the most hostile acoustic environment that makes their balconies un-useable and results in nothing more than gathering places for residential detritus, baring all to the passing traffic. No doubt, if the same is allowed to occur on the western side of the western distributor, the answer will be to provide apartments with 'wintergardens', i.e., no balconies. This is no solution either and usually results in the creation of ugly indoor/outdoor rooms where people hang washing to show off to passing traffic.

Further, as shown by the heat map plans on page 114, the parts of these towers with the best views and outlook and ability to shield from the harsh acoustic environment will be those parts unable to achieve any solar access due to their south-westerly orientation.

Consequently, if residential towers are unsuitable for acoustic and environmental performance reasons, these sites are only suitable for commercial uses, not mixed use with residential, except perhaps at the topmost levels. I doubt that 10-15 storeys of commercial floor space on these sites will ever be successful. They are too far away from a transport node and other core commercial development to attract the necessary tenants. Lower scale commercial buildings would be more suitable.

Density and transportation

The proposal seems to be oddly vague about the location of public transport options. The reality is that the L1 light rail line cannot cope with the additional patronage that this kind of density will bring. Pre-Covid, the L1 was stretched to capacity and is terribly slow. It also only serves Central rather than the central and northern CBD.

Strangely, the transport maps refer to a Metro investigation area of wide compass, yet my understanding was that the precise location of the station has already been established as being close to The Star. The Metro obviously offers the potential for some density on the site, but it is proposed to be located more than 400 m from the closest part of the site. This means that the density proposed is unsustainable. Had the metro station been located on this site, or less than 400m away, the opportunity for greater density proposed here might be more feasible.

Public domain

The public domain improvements look superficially attractive. However, the reality is that the public domain in Area 2 will be thoroughly overshadowed by the towers in that precinct and will be too narrow and hemmed in by the buildings.

The waterfront park in Area 3 is better in its scale and width, but again, due to the scale of the towers will be overshadowed for most of the morning.

Conclusion

The proposal is too dense, too tall, and unsustainable. It reflects a desire to achieve the highest possible yield without any regard to established urban forms in Pyrmont. It reflects nothing much more than reverse engineering to create building envelopes referable to a notional shadow outcome over any other principle of urban planning or design.

While I have often admired some of FJMT's architecture, such as ANZ Tower and my own building, Sugar Dock, this plan is more reminiscent of FJMT's flawed proposal for The Star, which was rightly and roundly rejected. This ought to be as well.

Yours faithfully

A.M.Pickles

182596

Plater

Ultimo

I attach my submission.

230 Bulwara Rd
Ultimo 2007
NSW
August 20, 2021

SUBMISSION
Blackwattle Bay
State Significant Precinct Study

Dear Sir/Madam,
As an Ultimo resident, I am writing regarding the proposed transformation of the old Fish Market, just North of Ultimo, into an ugly massive over-development.

I live (50 per cent of the time) in Ultimo. My son lives here fulltime. I have owned this house since the early 1980s. It is one of the quietest, prettiest streets in the inner city and because heritage aspects and its history have been acknowledged, these have been largely maintained. Often tourist groups (pre-Covid) would come past my home learning of the area's unique and fascinating history. It has a community feeling like nowhere else in Sydney. Ultimo and Pyrmont are treasures and should be maintained at all costs. To not do so, is so short-sighted it takes my breath away.

The changes the NSW government is planning for this area are completely out of touch with the wishes of the local residents and the heritage aspects of Ultimo/Pyrmont. We all know what a disaster the Barangaroo building has been. It can be seen from every side of Sydney, is ugly, miles too tall and allegedly was only allowed because of the lobbying power of its owner. It's a disgrace.

We don't want anything similar here in Pyrmont/Ultimo. We have the chance now to redevelop the fish markets in a beautiful, locals-friendly way which would also attract tourists. Massive blocks of flats won't do that, and will mar the location for years to come.

The development would also physically impact our day-to-day quality of life, especially because of the proximity of the proposed oversized buildings, lack of community open space and amenities.

Blackwattle Bay is a sub-precinct of the Pyrmont Peninsula Place Strategy (PPPS – Dec 2020) which describes it as “a place of transformation and renewal”.

I am concerned regarding the design and building height. The development would potentially include 1550 dwellings for about 2800 new residents. Tower blocks would be up to 45m in height - taller than the adjacent Anzac Bridge pylons and considerably taller than the residential buildings in adjacent North Pyrmont/Jackson Landing.

Some proposed residential buildings are directly adjacent to the Western Distributor exposing future residents to traffic noise and fumes. This is inconsistent with PPPS Direction 9 (page 33): “Great homes that can suit the needs of more people.”

The proposed 45m towers would overshadow Wentworth Park, Pyrmont and Ultimo and deprive Pyrmont residents of their harbour views. They would similarly overshadow the proposed Foreshore Promenade, Urban and Waterside Parks and Bank Street Open Space.

This is inconsistent with the following PPPS provisions:

- Direction 2 (page 25): that “Development (should) complement or enhance that area.”
- Blackwattle Bay sub-precinct priority 6 (page 67): to “Establish controls to ensure development protects sunlight to existing and future open space...”

The proposal does not include any provision for social housing and allows only a minimal five percent of floor area for affordable housing (which could be offset by payment of a lump sum by the developer). This would contribute significantly to the “gentrification” of Pyrmont and the Peninsula, while accelerating the migration of lower-income populations away from the city.

This is inconsistent with PPPS Direction 9 (page 33 - “Great homes that can suit the need of more people”) in particular that “New housing:

- should deliver a diversity of housing types and tenures to suit different household sizes, configurations and needs.
- should be affordable to ensure a mix of people can continue to live in the Peninsula.
- should aim to boost social and affordable rental housing with market housing.”

There are no provisions for the essential amenities such as schools, child-care and health care facilities necessary to cater for the needs of 2800 proposed residents. Specifically, the proposal does not include a new primary school, when the Ultimo Public School, the only current example in the peninsula, is expected to reach capacity very soon.

The proposed foreshore promenade is nothing more than a heavily-promoted shopping/entertainment boulevard (Barangaroo style). It would be overshadowed by the high -rise buildings to the east.

Like other Ultimo and Sydney locals, I am concerned about the numerous major developments the government is progressing during the current pandemic when community consultation and organisation is difficult. Just stop it!

Go back to the drawing board and allow more time for residents and building owners to comment on these plans. We have the chance to save this part of Sydney becoming an ugly sprawl before it's too late. Money is not everything! Surely the pandemic has shown us that.

With thanks.

Yours Sincerely,

Diana Plater

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181766

Roach

Annandale 2038

Blackwattle Bay Redevelopment

I have reviewed the current information provided for the Blackwattle Bay redevelopment. I am strongly opposed to the following in the current proposal:

- There is insufficient open space and that which has been provided is significantly overshadowed by development so will be mostly unusable. This reflects poor development design.

- The scale (up to 45 storey) and bulk of the development proposed will have significant adverse impact on both the local area, as well as skyline views from most directions.

- A key feature of the area (Anzac Bridge) will be overshadowed (in terms of height) by the proposed development which significantly detracts from this iconic view.

- There will be significant overshadowing in the current form, of public open space including across the bay itself.

- The walkable public open space is minimal at some points.

- There has been insufficient consideration given to the protection of the natural harbour.

Any new development in this area needs to be is sensitive and enhance the character of the area. The current proposal detracts from the urban environment, is not sensitive, and in no way enhances the character of the area and as such, should not progress for further review.

Blackwattle Bay Redevelopment

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- The scale (up to 45 storey) and bulk of the development proposed will have significant adverse impact on both the local area, as well as skyline views from most directions.
- A key feature of the area (Anzac Bridge) will be overshadowed (in terms of height) by the proposed development which significantly detracts from this iconic view.
- There will be significant overshadowing in the current form, of public open space including across the bay itself.
- The walkable public open space is minimal at some points.
- There has been insufficient consideration given to the protection of the natural harbour.

Any new development in this area needs to be is sensitive and enhance the character of the area. The current proposal detracts from the urban environment, is not sensitive, and in no way enhances the character of the area and as such, should not progress for further review.

Kath Roach

Annandale

183381

Rose

Dee Why 2099

please see my attached word document.

regards Cleveland Rose

August 19 21

Submission of Public Comment Re: Blackwattle Bay Proposal

I strongly object to the above proposal. I believe it should be flatly rejected with the scope of the project re evaluated.

Allowing this proposal to proceed would have detrimental consequences for both the community of Pyrmont Peninsula (including Ultimo) as well as diminishing Sydney's rich diversity.

This contentious proposal succinctly highlights what I believe is a fundamental flaw within our city's planning system.

A failing in protocol and process that not only delivers poor outcomes for communities

but undermines diminishes the public's trust in the state's planning system.

In my concluding comments I will attempt to articulate what I perceive as the core of problem besetting city planning. I will also briefly offer possible options regarding how we might improve this broken, corrupted system.

However simplifying the main areas of criticism to the above proposal I list the following sub-headings:

- Lack of urban vision
- Neglect of heritage / Disregard of history
- Poor precedent for Pyrmont and Sydney
- Compromised public space outcome
- Absence of both affordable and public housing

The late artist Lloyd Rees once described as" the city is the greatest work of art possible".

Our city's burgeoning growth has become an exercise in government revenue building that prioritises over community building.

Our public land and institutions are being ramsacked, sold off or worse still neglected, to fill the government's coffers.

Barangaroo's development, the abolishment of the residential communities of The Sirius Building Millers Points all recent developments exemplify the ensuing gradual social disintegration taking place.

While arguably this is and always has been the case, the manner in which development is hoisted upon often unwilling communities speaks to corrupted set of planning policies and protocols.

City Planning has become an unfortunate exercise in property management, political and corporate power plays.

As someone whose professional life both within the public, private sector has been dedicated to architecture of the city design I despair of this deepening trend.

I was involved in the strategic urban design and planning for Pyrmont Peninsula's rejuvenation approximately three decades ago. My involvement is briefly detailed at the conclusion of my comments.

Needless to say I have some prior knowledge of the decisions that influenced the current built outcomes.

Despite this initial involvement in guiding the city design principles underpinning "The City west urban Strategy", I willingly concede upon review , there is room for improvement in both process and end results.

Also noteworthy is the fact that urban interventions the scale and complexity of Pyrmont /Ultimo *require decades, not simply years* to develop their respective sense of community, city culture as well as public space amenity to be adequately assessed.

Undoubtedly it is both prudent and proper that the urban design and planning principles that underpinned the widely successful CWUS now over thirty years old should be reviewed, scrutinized and reassessed to gauge their effectiveness as fit for purpose.

There may be some lessons to be gleaned for those willing to set aside their personal preconceptions, predilections and ambitions.

Lack of urban vision

The proposal as it stands presents what could be described as a cookie cutter response to standard urban renewal situation.

Yet this district, the Pyrmont peninsula is anything but "standard".

Its physical context with both its "pros and cons" combined with maritime history makes sit quite unique within an Australian context, let alone Sydney as a city.

There are 2 points that need to be addressed which this proposal hasn't.

The first is addressing a major constraint and the other is proposing a building type that speaks to the unique heritage language of the Pyrmont peninsula.

First addressing the "major constraint".

The initial planning work with the Peninsular (including Ultimo and Pyrmont) clearly defined the detrimental imposition of the 1960's elevated freeway.

An infrastructure that bisected not just Pyrmont from Ultimo as well as Darling Harbour from the Sydney's CBD.

It was universally accepted as a "*major planning constraint*"... which surely is an understatement.

Attempts by myself as the Department of Planning's representative architect /urban designer, to explore the options of tunnelling the existing traffic below both Darling Harbour and Ultimo/Pyrmont for whatever reason, fell on deaf ears.

This proposal was deemed by Planning Dept's senior staff and others as being well outside the Strategy's remit.

Note the cost of tunnelling within urban environments was perceived to be excessive around the late 1980s. Such infrastructure in Sydney's context was at that point in its infancy.

Clearly the environmental improvements of tunnelling freeways rather than either maintaining them at street level or elevating them, are self evident .

Improved air quality, greatly reduced noise and light (from passing cars) and ambient visual pollution being most obvious benefits.

Additionally opening up large tracts of contiguous land for both private and public use could provide not only societal benefits but economic ones as well.

This option should have been properly explored back then in late 1980s**.**

Even if the cost at that stage was deemed excessive, a strategic staged scope of works that gradually tunnelled the motorway could have been explored and costed.

It certainly should be a prime focus of urban planning work within the Pyrmont peninsula today.

Global cities that have a skerrick of sustainable creditability don't encourage multi lane motorways to enter or skirt around the inner perimeter of their inner urban centres.

Competitive green cities rely on a highly efficient public transport system along with "green" (electric) taxis, cycling and pedestrian connections.

These replace the "lazy 1960s Los Vegas inspired" mode of commuting by private vehicle together with the unavoidable "spaghetti of concrete infrastructure" with their respective unusable undercroft space as evident in Darling Harbour and adjacent to the existing Fishmarkets.

The prospect of building mixed use developments as well as residential multistorey building that front onto a major freeway running directly to the city's inner edges belongs to the city planning thinking of the past century.

Furthermore the fact that the state is proceeding with planning and eventual delivery of a host of infrastructure projects like "Sydney Metro West and "The Beaches Link" tolled motorway should be factored into the relevance or otherwise, of maintaining the disruptive, ugly and potentially redundant motorway.

The second lost opportunity regarding "vision" is the proposal 's stock standard response to building type.

The Pyrmont Peninsula has a wonderfully unique low to medium scaled building typology that includes large long warehouses, industrial scaled structures that create their own dense forms and residential terrace housing.

The ridgeline of the peninsula is defined approximately by Bulwarra Road which joins both Ultimo and Pyrmont. The indigenous derivation of the meaning of Bulwarra is, and I paraphrase, “place of lofty views”.

Walking along Bulwarra Rd and Harris Street affords wonderful vistas both eastward towards the CBD and westward which should be respected by any new proposal.

Neglect of heritage/ Disregard of history

The prospect that Pyrmont should be accommodating high rise buildings that essentially mimic both the scale and skyline CBD’s cityscape is counterproductive to the area’s current attractiveness and undermines its current ongoing success.

Pyrmont’s low human scaled built environment was and indeed still is arguably its greatest asset.

Together with its rich unique built history of maritime use, warehousing and associated industrial activities have helped to shape the nation’s growth and eventual prosperity from its humble beginnings early 1800s.

The underlying premise towards forming an urban design approach within the CWUS for both Ultimo but especially Pyrmont was to reinforce its distinctive peninsular “ridge based” topography with its flanking array of large scaled distinctive heritage such as maritime wharfs, warehouse storage, industrial use(sandstone quarries and coal, cement loading etc) and precincts of traditional residential terraces.

Residential precincts of terrace housing along the peninsula’s spine (Harris Street, Bulwara Rd etc) were preserved.

The CWUS also considered the quality of the public space as a defining consideration rather than a residual “happenstance”. Boulevards (Harris and Union streets) waterfront promenades, clifftop walkways together with pocket parks were defined by human scaled surrounding built envelopes.

This was to ensure no adverse climatic factors like overshadowing, wind tunneling or other adverse micro climatic affect were avoided.

The current proposal should take note and emulate this commonsense principle.

Proposing high rise towers in excess of 7-8 standard storeys (i.e. 24-28ms high above street level) will inevitably create unnecessary overshadowing of the adjoining public amenity as well as buildings.

The proposed towers located to the north east of Blackwattle Bay the highest being up to 45 storeys, will undoubtedly compromise the adjoin public promenade with overshadowing especially during the am winter months when accessing sunshine is essential for our well being.

This important aspect of the CWUS has been conveniently neglected, jettisoned by the current state government regarding its current thinking for Pyrmont's future.

Any historical research into the proposals by Colonial Sugar Refinery's (CSR) Development Consortium's proposal approximately late 1980s (including Lend Lease and their design/planning consultants Cox Architects) might adequately describe what a high-rise Pyrmont might have looked like.

Ignoring, glossing over Pyrmont/Ultimo's recent successful achievements is fundamentally destructive to engendering a more progressive, innovative and imaginative discourse of city design.

This proposal speaks to a trend that is essentially anti- urban," top down thinking" which makes a mockery of community consultation.

This modus operandi is perceived (rightly or wrongly) by many Sydneysiders as completely pro developer, anti community.

Poor precedent for Pyrmont and Sydney

Following on from the above comments, allowing this proposal with it's a mix of high rise towers to proceed will set an unfortunate, disturbing precedent for others to follow.

The highly contentious Star City Casino DA with its soaring tower (reportedly Sydney's highest) equally defines an absurdly detrimental proposal to contemplate.

Why should a wealthy casino operator be allowed to flaunt the regulatory legislative planning ordinances?

Their fiscal contribution as one of the state's greatest constant revenues sources is a factor frankly hard to ignore.

The highly successful pedestrian/ cyclist connection created by Union Street connecting Union Square/Harris Street with Pyrmont Bridge was *a main urban design feature was highly* prioritised by CWUS's guiding principles.

This highly successful boulevard would be cast into shadow by a *Mordor-like Tower* in the form of the proposed Star City Tower's with its northern eastern location.

Allowing designs such as this strike a veritable death knell to our city's rich varied built environments by casting aside all conventions of civil behaviour and urban manners.

Absence of both affordable and public housing

The proposal as I understand does not contain a sufficient degree of either affordable or public housing.

One could easily imagine that the residential units within the high rise towers will not be "owner occupied" but simply more investment properties whose main selling point would be harbour views and city location.

This effectively locks out younger couples from purchasing property close to the CBD.

This development malaise plaques Sydney and well beyond.

Where government is able to intervene and address this point it should.

This trend also has broken up established communities within our cities heartland within recent years all due to the value of their properties as perceived by government as revenue generating "redevelopment opportunities".

The removal of public housing residents from Millers Point, The Rocks and the "Sirius Building" where whole communities were broken up and individuals were offered alternative accommodation outside the city centres stands as a blight to our city's sense of social equity.

This is also a stain upon our state's urban policy settings.

This proposal at Blackwattle bay needs to rethink its commitment to both public and affordable housing by offering respectively 20% of the total residential floorspace to both.

Possibly those who were sent to the city edges from the above mentioned sites should be offered first priority in the public housing units.

Suggestions to address the "Current planning flaw" as before mentioned list 2 main proposals.

One of probity and the other of strategic design guidance.

Firstly a proper community consultation protocol needs to be devised and legislated.

Far too often do communities work collectively to achieve a form of consensus together with government (state or local) which at the eleventh hour is ignored, overridden.

Just as developers need to adhere to clear definable guidelines so should government honour its agreements, commitments to community aspirations.

Where those aspirations are deemed impracticable, unworkable etc the rationale should be articulated by government in a timely manner.

It should be remembered that communities know their local environment intimately and therefore their collective voice should be heard and carry appropriate gravitas regarding changes to their urban settings.

The second proposal concerns the need to re-establish a custodial design team to strategically plan and preserve , champion our precious public urban space.

To this point our city needs an independent statutory body of city planners and designers.

They need to be in the truest sense of the word*, public servants* not private consultants.

The city, indeed the state, doesn't have a proper independent committed public city planning authority *to think strategically and propose designs solutions regarding our future needs*.

This is not to denigrate the good work of the Greater Sydney Commission.

Rather is should be seen as the *functioning design arm* of the strategic body needed *to guide Sydney's major developments and protect promote and advocate for improved public spaces*.

This important public service has been outsourced at least two decades ago to the private realm.

A situation that might conceivably enable a planning /urban design consultant to work for the government in advising strategic planning one month and the next for the most rapacious of developers on very same site.

The need for a distinctive "creative edge" between the function of public and private is as real and evident now as it was decades ago.

From personal experience a design body that encourages long term commitment to the public good and life of the city's citizens can guide (and deliver) interventions that last the test of time.

The successful urban intervention of Eveleigh Goods Yard, Ultimo and Pyrmont (all part of CWUS) stand as living examples that *city planning by public authority* can produce excellent results if properly instigated and adequately supported.

New York, Copenhagen and indeed Melbourne to mention but a few examples of highly successful global cities have benefitted greatly by the intellectual and creative rigour of such an independent minded body.

A body that's at *safe statutory "arms length" from political sway and interference*.

Sydney should do likewise and return to such a successful model but with greater protection from political interference.

Let me conclude by complimenting one important urban intervention around the Blackwattle Bay Precinct; namely the relocation and indeed the new design of the Fishmarkets.

Depending on providing a high level of detailing, the result should be "a big win" for the district of Pyrmont/Ultimo as well as more broadly, the city.

I do note however that the proposal encroaches considerably upon the Bay's southern headwaters.

A point which is highly unfortunate.

"Blue space" (bays and harbour waters etc) is a premium commodity for all to share in Sydney.

The city's beautiful waterways should be extended, not diminished, by future development.

A good result regarding this intervention however shouldn't come at the cost of a very poor urban outcome within the current Fishmarkets' footprint and its adjacent sites.

An ordinary development on such an extraordinary Sydney harbour site needs rejecting, followed by a serious reappraisal.

Cleveland Rose

architect/urban designer

58 Delmar Pde Dee Why NSW 2099

My involvement in Sydney in urban design began on working as a young architect straight from post graduate urban design studies in Denmark with (now Professor) Jan Gehl with the "*Urban Design Unit*" within the (then) Department of Planning NSW.

I was eventually assigned to work as urban designer/architect within a small team on formulating the draft of the "City West Urban Strategy" released to the public approximately early 1990s.

Regrettable that unit was outsourced to private consultants early to mid 1990s.

Redevelopment of Pyrmont/Ultimo was considered among the crowning achievements of the CWUS.

The concepts and ideas that were promoted by myself and others likeminded professionals within "the unit " (such as the late architect Neil Wilson) around the importance of public space reflect those prevalent in the socially progressive Nordic countries, particularly Denmark at that time and place.

Three decades on I stand by them.

183411

Ryan

Surry Hills, 2010

My submission is enclosed in the attached letter. Please feel free to contact me if there are any issues with the submission.

Thanks and kind regards,

Tristan Ryan

Tristan Ryan
0407 390 666
tristan.ryan@gmail.com

Department of Planning, Industry and Environment
Blackwattle Bay redevelopment submission
Parramatta NSW 2124

To whom it may concern,

I write to you regarding the proposed redevelopment at Blackwattle Bay, and in particular the provision of social and public housing as part of the redevelopment.

Though I have been living in Surry Hills for a year, I have lived in the Balmain, Glebe and Annandale for most of my life. I currently work as an urban planning and heritage conservation consultant, and I have worked on a number of precinct-scale projects. While I'm pleased about a number of aspects of the proposal, particularly the resurrection of the Glebe Island Bridge. I am very concerned about the lack of social housing as part of the proposal, particularly on publicly owned land.

I note from your report (p. 141) that people on moderate incomes struggle to afford a two-bedroom apartment in the City of Sydney, and people on low or very low incomes cannot afford an apartment at all. As someone on an above median income, with my partner also on quite a high income, we would not have been able to comfortably afford to rent a two-bedroom apartment in the LGA prior to the pandemic, and we are anxious about rents rising again.

I wish to draw your attention to the following regarding housing in New South Wales and Australia:

- According to the Community Housing Industry Association there are more than 50,000 households on the waiting list for social housing in New South Wales.[1]
- Anglicare Australia's 2021 rental affordability snapshot found that just 3 properties across Australia were affordable for a person living on the Jobseeker payment and just 0.5% of properties were affordable for a person living on the DSP.[2]

In view of the above, it is my view that the allocation of 5 percent of the proposed residential floorspace to affordable housing, and the lack of any consideration of social housing, is completely and woefully inadequate. Given the particularly intense housing unaffordability in the local government area, there is an especially acute need to provide

[1] Community Housing Industry Association, 'Budget fails 50,000 families in social housing queue', 22 June 2021, accessed 19 August 2021, https://communityhousing.org.au/media-releases/budget-fails-50000-families-in-social-housing-queue/

[2] Anglicare Australia, *Rental Affordability Snapshot*, April 2021, Anglicare Australia, Canberra, https://www.anglicare.asn.au/wp-content/uploads/2021/05/rental-affordability-snapshot-national-report.pdf, accessed 12 August 2021.

social housing within the City of Sydney. It is my view that the government is obligated to provide that housing, particularly on government land.

I implore you to follow the advice of housing researcher Kate Shaw - that new residential development on government land should start from a position that 100% of housing constructed on public land should be publicly owned social housing.[3] I urge the government to pursue this at Blackwattle Bay and build new communities in the City of Sydney rather than continuing to force poorer people to the margins.

I would be glad to assist in any way I can, so please do not hesitate to contact me.

Yours sincerely,

Tristan Ryan

[3] Shaw, K., 'Why should the State wriggle out of providing public housing?', 20 June 2017, accessed 18 August 2021, https://theconversation.com/why-should-the-state-wriggle-out-of-providing-public-housing-79581.

181476

Saberi

2017

August 18, 2021

Dr. Meead Saberi

School of Civil and Environmental Engineering

University of New South Wales (UNSW)

Email: meead@uniteforsydney.com.au

on behalf of â€œUnite for Sydneyâ€, a group of independent

candidates running for City of Sydneyâ€™s upcoming council election

www.uniteforsydney.com.au

NSW Department of Planning, Industry and Environment

Dear Secretary Jim Betts,

The NSW government has proposed a massive development plan for Blackwattle Bay and revitalisation of the Sydney Fish Market. The plans have been on public exhibition only since Friday 2 July 2021. They include construction of an up to 45 storeys 12-building complex with more than 1,500 high rise apartment dwellings, claiming to â€œpotentiallyâ€ deliver 5,600 jobs. The plans also propose a new site and a building for the Sydney Fish Market.

The public exhibition period closes on 20 August. There is no justification for curtailing the public exhibition period while the community is in lockdown, with people worried about their health, livelihood and families.

The proposed plans demonstrate an â€œoverdevelopmentâ€ of the Blackwattle Bay area that puts economic benefits to a select few above the community and the environment. It simply leads to the privatisation of the Blackwattle Bay harbour foreshore and the sale of public land to developers. This is yet another example of government-driven gentrification, similar to what happened at Millers Point a few years ago.

Waterfront revitalization projects are extraordinarily complex, incorporating real estate economics, land use, community benefits, ecology, hydrology, sustainability metrics, design, and politics across a variety of associated disciplines.

Only 5% to 10% of the proposed residential floor space will be dedicated to affordable housing. This is far less than the required floor space to meet the target of 10,000 new dwellings for the City of Sydney LGA. Whether the plan really requires an allocation of the developed residential floor space at the Blackwattle Bay area, or it alternatively permits the developers to pay a levy is unclear. Nevertheless, given the housing market outlook, the proposed overdevelopment accelerates the gentrification in the area. It is likely to push disadvantaged communities out of the entire Pyrmont peninsula, due to an increase in the property values and rents in the adjacent communities.

Whether the proposed plans are the best use of public land remains a big question for many residents who feel excluded from the consultation process.

Current financial constraints and market volatility and their COVID-19 affected outlook present significant challenges, particularly with respect to the projectâ€™s commercial, environmental, and affordable housing objectives. Job creation is highly unlikely to reach the project targets due to the outlook of residential and commercial vacancy rates in the coming years.

Stormwater and runoff management in the area, during and post-construction, adjacent to an already under pressure bay poses a great environmental risk. Many of the water bodies in Sydney harbour already do not meet water quality guidelines, especially following rainfall. Blackwattle Bay has been identified as home to the most polluted sediments, containing dioxins and heavy metal. The new development plans are likely to worsen the quality of the water in Blackwattle Bay and damage its ecology despite the proposed man-made mitigations.

The proposed plans do not follow any Aboriginal design principles in large infrastructure and development projects. The new development totally ignores community and lacks the use of appropriate design processes to promote Aboriginal input and leadership while ensuring the designed outcomes are culturally respectful, authentic, and appropriately designed to preserve nature.

The true economic, environmental, and social benefits of the proposed plans for the Blackwattle Bay and new Sydney Fish Market are not likely to meet the project targets. The plans are a classic example of grotesque waterfront overdevelopment. There is a growing opposition from many residents and local community groups that have mostly been ignored.

It is this lack of real, effective consultation that is at the core of our objection. It seems as though the answer was always to have two 45 storey towers; the only question being, what will they be surrounded by? What alternatives were really considered? Did the government, for instance, ever consider:

â€¢ Developing the area as an extension of Pyrmont, with modern, ecologically efficient, medium density, medium rise buildings reflecting the varied scale and style of Pyrmont?

â€¢ Alternatively, the area could instead be turned into an â€œIndigenous Botanical Garden and Biodiversity Parkâ€, contributing towards Sydneyâ€™s battle against climate change and increasingly frequent heatwaves.

â€¢ In addition to either of the above alternatives, why not build a new multi-sports arena to cater for popular sports other than swimming and football- for instance, a velodrome, a running track, or an ice rink?

This is an opportunity to develop a bold, creative and innovative precinct, one that adds to Sydneyâ€™s waterfront character, and preserves the connection to old Pyrmont and nature. Instead, the government proposed a Barrangaroo West. The state government should reject this proposal and go back to the drawing board and embark on a proper and consultative process. Only then can there be a legitimate outcome acceptable to the community and others who will be forever affected by the proposal.

Thank you,

Dr Meead Saberi

August 18, 2021

Dr. Meead Saberi
School of Civil and Environmental Engineering
University of New South Wales (UNSW)
Email: meead@uniteforsydney.com.au

on behalf of "Unite for Sydney", a group of independent
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Thank you,

Meead Saberi

Dr Meead Saberi

182516

Scard

Pendle Hill 2145

Dear Department of Planning, Infrastructure and Environment,

Please find attached Celestino's submission related to our site at 31-35 Bank Street Pyrmont.

Our submission includes:

- Cover Letter
- Attachment A - SSPS Main Submission
- Attachment B - Concept Vision for 31-35 Bank Street

Thank you,

Matthew Scard

CEO

Celestino

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20 August 2021
The Department of Planning, Industry and Environment
Blackwattle Bay Redevelopment Submission
(lodged via online portal)

Submission to Blackwattle Bay State Significant Precinct Study

Dear Sir/Madam

Celestino is one of the three private landowners in Blackwattle Bay, owning a waterfront industrial complex at 31-35 Bank Street Pyrmont. We share the Department of Planning, Industry and Environment's vision to create a world class harborside destination for Sydney and understand the complexities of the precinct, so appreciate the opportunity to provide feedback regarding the State Significant Precinct Study for Blackwattle Bay.

While we support the majority of the study we are concerned that the planning controls proposed for our site do not support a high quality and financially viable development, which is a negative result for Celestino, and this may also create knock-on effects for the future vision of Blackwattle Bay.

Our attached submission provides a detailed assessment that justifies a review of the planning controls for our site. Allowances for building height, gross floor area, commercial and residential floor space ratios and flexible design controls all contribute to our ability to deliver a world class development, as shown in our attached vision document.

The NSW Government is investing heavily in Blackwattle Bay, which includes the redevelopment of the Sydney Fish Market. It is planned to become an iconic place that provides quality residential housing, commercial and office spaces to support businesses of the future and civic spaces, shops, restaurants and bars for Sydney locals and visitors to enjoy. However, the restrictive planning controls outlined in the State Significant Precinct Study for Blackwattle Bay render our site undevelopable. We at Celestino are concerned our aim to contribute to the vision for Blackwattle Bay, by developing what is currently an industrial site into a high quality and vibrant residential, commercial, retail and dining mixed use precinct, will not be viable under these proposed planning controls.

Celestino looks forward to discussing our recommendations with the Department of Planning, Industry and Environment to realize the vision for Blackwattle Bay.

Yours Sincerely

Matthew Scard
Chief Executive Officer

Attachments:

A. Blackwattle Bay SSP Study Main Submission
B. Concept Vision for 31-35 Bank Street

URBIS

BLACKWATTLE BAY STATE SIGNIFICANT PRECINCT STUDY

31-35 BANK STREET, PYRMONT

SUBMISSION TO DPIE

Prepared for Celestino
20 August 2021
Final Submission

CELESTINO BATESSMART

This report is dated 20 August 2021 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd's (Urbis) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of **Celestino** (Instructing Party) for the purpose of a Submission to DPIE (Purpose) and not for any other purpose or use. Urbis expressly disclaims any liability to the Instructing Party who relies or purports to rely on this report for any purpose other than the Purpose and to any party other than the Instructing Party who relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events including wars, civil unrest, economic disruption, financial market disruption, business cycles, industrial disputes, labour difficulties, political action and changes of government or law, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or made in relation to or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

Urbis has made all reasonable inquiries that it believes is necessary in preparing this report but it cannot be certain that all information material to the preparation of this report has been provided to it as there may be information that is not publicly available at the time of its inquiry.

In preparing this report, Urbis may rely on or refer to documents in a language other than English which Urbis will procure the translation of into English. Urbis is not responsible for the accuracy or completeness of such translations and to the extent that the inaccurate or incomplete translation of any document results in any statement or opinion made in this report being inaccurate or incomplete, Urbis expressly disclaims any liability for that inaccuracy or incompleteness.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the belief on reasonable grounds that such statements and opinions are correct and not misleading bearing in mind the necessary limitations noted in the previous paragraphs. Further, no responsibility is accepted by Urbis or any of its officers or employees for any errors, including errors in data which is either supplied by the Instructing Party, supplied by a third party to Urbis, or which Urbis is required to estimate, or omissions howsoever arising in the preparation of this report, provided that this will not absolve Urbis from liability arising from an opinion expressed recklessly or in bad faith.

Urbis staff responsible for this report were:

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Project code	P0024677
Report number	Final Submission

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URBIS CELESTINO BATESSMART

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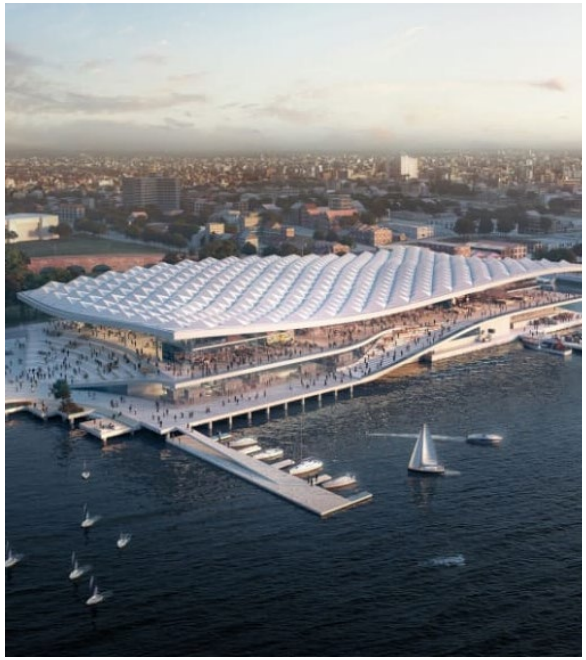
EXECUTIVE SUMMARY

This submission has been prepared by Urbis Pty Ltd (**Urbis**) and Bates Smart on behalf of Celestino in response to the public exhibition of the State Significant Precinct Study (**SSP Study**). Celestino is the owner of land at 31-35 Bank Street Pyrmont located on the north-west side of Blackwattle Bay.



An executive summary of the submission to the SSP Study is provided as follows:

Celestino supports the overarching vision and principles for Blackwattle Bay:

- ❑ The goal of developing a world class waterfront promenade and development;
- ❑ The principles for the heights of buildings; and
- ❑ The principle of a mixed-use precinct.

For Celestino to contribute to the future vision and principles of Blackwattle Bay the following four key areas should be addressed in the final planning framework, built form controls, land use mix and urban design parameters:

1. Building height: The SSP Study identifies a maximum building height of RL91.5 for Celestino's site. **It is recommended that a maximum building height of RL121.1 is applied to the site**. This recommended building height is consistent with the building height principles of the SSP Study.

2. Density: The SSP Study identifies a maximum gross floor area (**GFA**) of 16,250 sqm for Celestino's site. **It is recommended that a maximum 26,000 sqm GFA is identified for the site**. This GFA is commensurate with the recommended building height for PLO 02 of RL121.1. The SPP Study should identify an FSR control or site-specific maximum GFA control based on the merits of the built form massing.

3. Non-residential floor space: The SSP Study identifies a minimum non-residential GFA of 7,000 sqm for Celestino's site. Whilst the principle to deliver employment-generating land uses across the precinct is acknowledged, **it is recommended that a non-residential GFA of 3,000 sqm is applied to the site**. Celestino strongly advocates for a more equitable distribution of commercially viable non-residential floor space between the private landholdings and Government land.

4. Design Code flexibility: **The Design Code should foster greater flexibility on the strict application of site-specific built form controls** (such as building separation and setbacks) to encourage place-led and performance-based outcomes. The Design Code should align with the principles of the new Design and Place SEPP.

Ultimately the successful realisation and early activation of Blackwattle Bay and delivery of significant public benefits (including the waterfront promenade) is contingent on economically feasible and commercially viable development commensurate with an appropriate planning framework, particularly in relation to built form controls, land use mix, and urban design parameters.

PROJECT TEAM

CELESTINO

Celestino is an Australian owned family business focused on delivering high quality, sustainable urban developments across Australia. Celestino is part of the Baiada Group, renowned for iconic brands Steggles and Lilydale, founded in Western Sydney by Celestino Baiada in 1916. The Baiada Group is one of Australia's largest private companies employing over 7,000 people with an annual turnover in excess of $2 Billion.

For the past twelve years Celestino has been working closely with key stakeholders, including local councils and State Governments on the visioning, master-planning, rezoning and development of strategic projects in areas including Western Sydney and South East Queensland, and now has projects with an end value of over $10 Billion in the pipeline.

Sydney Science Park, located in the Western Sydney Aerotropolis, is a testament to the calibre of projects Celestino is delivering. Sydney Science Park is a visionary 287- hectare mixed use city currently under development that will create an internationally recognised epicentre for STEM education, research and development, innovation, commercialisation and collaboration in the heart of Western Sydney. It has the potential to be the home to 100,000 people and create over 40,000 jobs. Celestino brings this long track record with a commitment to innovation, place making and delivering excellence to the redevelopment of 31-35 Bank Street, Pyrmont.

With 31-35 Bank Street, Celestino aims to make a significant contribution to the revitalisation of Blackwattle Bay.

This will be achieved by purposely designing and curating a dynamic, mixed-use building that not only provides high amenity apartments but also meets the specialised needs of R&D-driven enterprise and the talented human capital base that empowers innovation-driven economic growth.

The establishment of the Sydney Science Park Satellite Innovation Hub at 31-35 Bank Street will merge the innovation and employment potential of research-oriented anchor institutions, high-growth firms, and tech and creative start-ups in a well-designed, amenity-rich residential and commercial environment.

Celestino have assembled a consultant team of Bates Smart and Urbis who have extensive experience in creating waterfront mixed use precincts, that are celebrated for design excellence and creating places that are authentic and responsive to context and communities needs.

PICTURED Sydney Science Park Artists Impressions

URBIS CELESTINO BATESSMART

PROJECT TEAM

BATESSMART

Bates Smart is a multidisciplinary design firm delivering architecture, interior design, urban design and strategic services across Australia, with a staff of over 250 in studios in Melbourne and Sydney. Our award-winning projects transform the city fabric and the way people use and inhabit urban spaces and built environments.

Bates Smart understand the social and economic forces currently shaping communities and their impact on built environments of the future. Our founders were the innovators of their time, and we are leaders in the debate on how and where we work, meet, live, learn and heal.

Our approach is not simply about making big gestures. We nurture and develop every size of project and all its elements, until the details complement and enhance the whole.

Bates Smart's clients are the partners that make the work we do possible. We understand their commercial objectives and the risks that must be balanced to bring their projects to fruition successfully.

As we move forward energetically, our studios embrace the challenge of each project, questioning assumptions and testing solutions until we find their bespoke optimal outcome.

The approach that has delivered our transformational buildings is at the heart of all our projects, large and small; they are affirming, uniquely conceived for our clients, and beautiful.

URBIS CELESTINO BATESSMART

PROJECT TEAM

URBIS

At Urbis, we have one simple goal – to shape cities and communities for a better future.

It's something Urbis achieve by drawing together a network of the brightest minds. Urbis are a creative community of practice experts, working to deliver fresh thinking and independent advice and guidance – all backed up by real, evidence-based solutions. Urbis act for clients who are making the places we live and reshaping the way we live there. At Urbis and through the international business Cistri, we seek to collaborate and partner with you for success.

Urbis advise developers, property owners, investors, private firms, NGOs, community groups, industry associations and all levels of government – local, state and federal.

Among the many lines of work we perform, we:

- ❑ design and master plan urban developments
- ❑ guide development projects through the complex process of planning approval
- ❑ help our clients imagine and build new places of work, leisure, entertainment and commerce – from shopping malls to business parks and retirement living
- ❑ provide property market and economic analysis
- ❑ research and analyse shopping trends and market forces
- ❑ consult with communities
- ❑ evaluate policy and advise on strategy
- ❑ provide heritage advice
- ❑ value properties and advise on property transactions.

Urbis have contributed to some of Sydney's largest city shaping and urban renewal projects, including:

- ❑ The Bays Precinct
- ❑ Quay Quarter, Circular Quay
- ❑ Cockle Bay
- ❑ 130 Elizabeth Street
- ❑ Green Square Town Centre
- ❑ Ashmore Estate
- ❑ Telopea
- ❑ Rhodes Peninsula

URBIS CELESTINO BATESSMART

THE SITE AND CONTEXT

31-35 BANK STREET, PYRMONT

The site at 31-35 Bank Street, Pyrmont is located on the southern foreshore of the Pyrmont Peninsula and within the northern portion of the Blackwattle Bay precinct.

The site has an area of 2,971 sqm, and frontages of 46 metres to Bank Street and Blackwattle Bay. The legal description of the site is Lots 20, 21 and 22 in DP811844.

The site is one of three private land holdings in the Blackwattle Bay precinct, with adjoining private land comprising the Poulos site to the west and the Hymix site to the east.

Blackwattle Bay is physically separated from Pyrmont by the Western Distributor to the northeast.

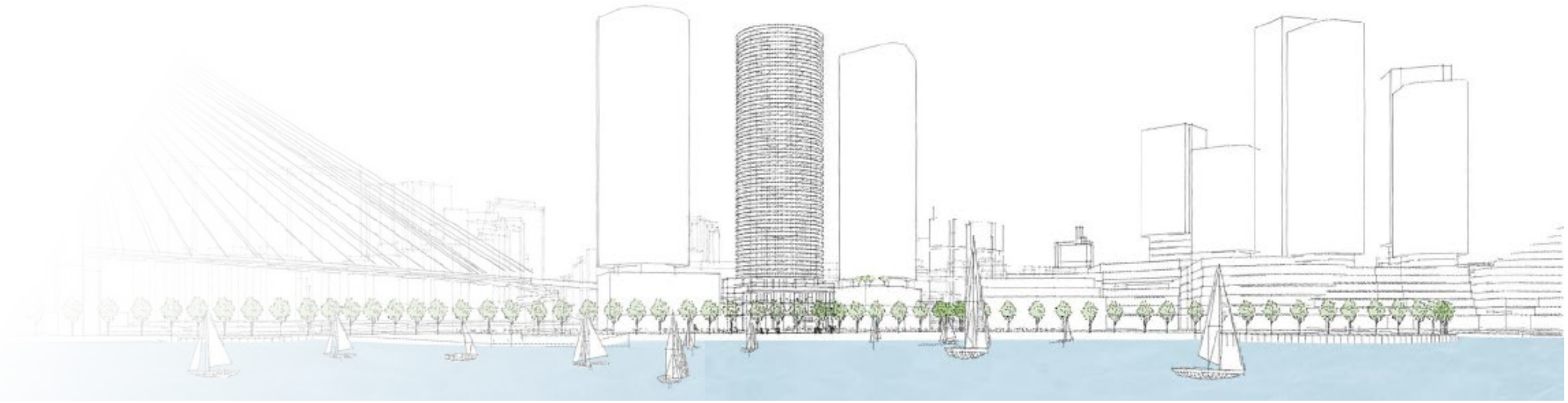
CONCEPT VISION
31-35 BANK STREET, PYRMONT

A mixed use tower comprising activated ground floor retail, podium with a Sydney Science Park Satellite Innovation Hub, and high quality residential living above

CONCEPT VISION
31-35 BANK STREET, PYRMONT

PLANNING AND DESIGN PRINCIPLES

- ❑ Contributing to an activated ground plane
- ❑ Increasing employment close to Central Sydney through innovation and education land uses
- ❑ Delivering a continuous waterfront promenade
- ❑ Introducing a new through site link, connecting the new Pyrmont Metro station to the waterfront
- ❑ Creating new homes that contribute to a vibrant and safe twenty-four-hour place



DEVELOPMENT PROGRAM

Celestino is committed to early delivery and activation of the site. It has the capabilities and access to capital to deliver high quality development on the site in the short term.

Early activation is contingent on an economic feasibility that enables Celestino to move to the next stage. Economic feasibility for development is commensurate with a suitable planning framework, with respect to height and density, non-residential GFA, and built form controls that facilitate appropriately sized floor plates.

Immediately following rezoning and gazettal of the statutory planning controls, Celestino can submit a development application. Construction can commence following the granting of consent.

ESTIMATED PROJECT DELIVERY PROGRAM

The following timeline provides estimated program milestones for the project delivery:

REZONING
MID 2022

DEVELOPMENT APPLICATION
LATE 2022

CONSTRUCTION
2023 – 2024

COMPLETION
Aligned with completion of the Fish Markets

OVERVIEW OF CELESTINO'S PREVIOUS SUBMISSIONS

SUBMISSION TO REVITALISING BLACKWATTLE BAY

In May 2020, Infrastructure NSW (**INSW**) published a brochure titled *Revitalising Blackwattle Bay* for public consultation. The brochure sought to facilitate community engagement on the future urban renewal of Blackwattle Bay and three development scenarios.

In June 2020 Celestino prepared a detailed submission to the public exhibition of the *Revitalising Blackwattle Bay*. The submission introduced the concept proposal and demonstrated its alignment and ability to achieve key urban design and planning principles established for Blackwattle Bay, namely:

- As one of the three private landowners, contributing to a continuous waterfront promenade and the missing link to the 15 km Sydney Harbour Foreshore Walk from Woolloomooloo to Rozelle
- Creating publicly accessible open space connections in the form of a new through-site pedestrian and cyclist way, linking the neighbourhood of the Pyrmont Peninsula to the waterfront
- Creating new homes that support a vibrant and safe 24 hour place
- Contributing new employment opportunities close to the CBD in an innovation precinct with the establishment of a Sydney Science Park Satellite Innovation Hub
- Creating an authentic place, building on the site's historical significance and local character, and activating the public domain

URBIS CELESTINO BATESSMART

OVERVIEW OF CELESTINO'S PREVIOUS SUBMISSIONS

SUBMISSION TO DRAFT PYRMONT PENINSULA PLACE STRATEGY

In September 2020, Celestino prepared a submission to the Pyrmont Peninsula Place Strategy (**PPPS**).

- Celestino signalled its support for the strategic planning policy direction embedded in the draft PPPS and the successful realisation of the 20-year vision to transform the Peninsula and achieve the aspirations of the business, industry, visitors, local and future residents.
- Celestino encouraged NSW Department of Planning, Industry, and Environment (**DPIE**) to reinforce the catalytic role of Blackwattle Bay in the economic growth and transformation of the site into a new urban quarter and to maintain the emphasis on renewal, job creation, and economic activity of the precinct over the next 20 years.
- The successful realisation of the peninsula and delivery of significant public benefits (including the waterfront promenade) is contingent on economically feasible proponent-led development proposals commensurate with an appropriate planning framework, particularly in relation to land use mix, urban design controls, and built form parameters (density, building height, floorplates, setbacks etc).
- DPIE was encouraged to acknowledge the tangible economic and community benefits of establishing an uninterrupted waterfront promenade along the Blackwattle Bay foreshore is reliant upon site-specific proponent-led developments.
- It was recommended that the PPPS Structure Plan acknowledges the suitability and capacity of land to the south of Bank Street to achieve high density development commensurate with taller buildings, where it is supported by robust urban design analysis and can deliver acceptable amenity and design excellence outcomes.
- Whilst Celestino is committed to early delivery and activation the site including the foreshore link, this is contingent on an appropriate planning framework that supports economically feasible and commercially viable development.

BLACKWATTLE BAY STATE SIGNIFICANT PRECINCT SUBMISSION

This submission makes the following recommendations for the SSP Study in relation to Celestino's site:

1) **Building height**: The SSP Study identifies a maximum building height of RL91.5 for Celestino's site. **It is recommended that a maximum building height of RL121.1 is applied to the site.** The recommended building height is consistent with the building height principles embedded in the SSP Study. We recommend that the future statutory planning framework acknowledges the suitability and capacity of private landholdings to accommodate tall buildings, where it can be supported by robust urban design analysis and deliver acceptable amenity and design excellence outcomes.

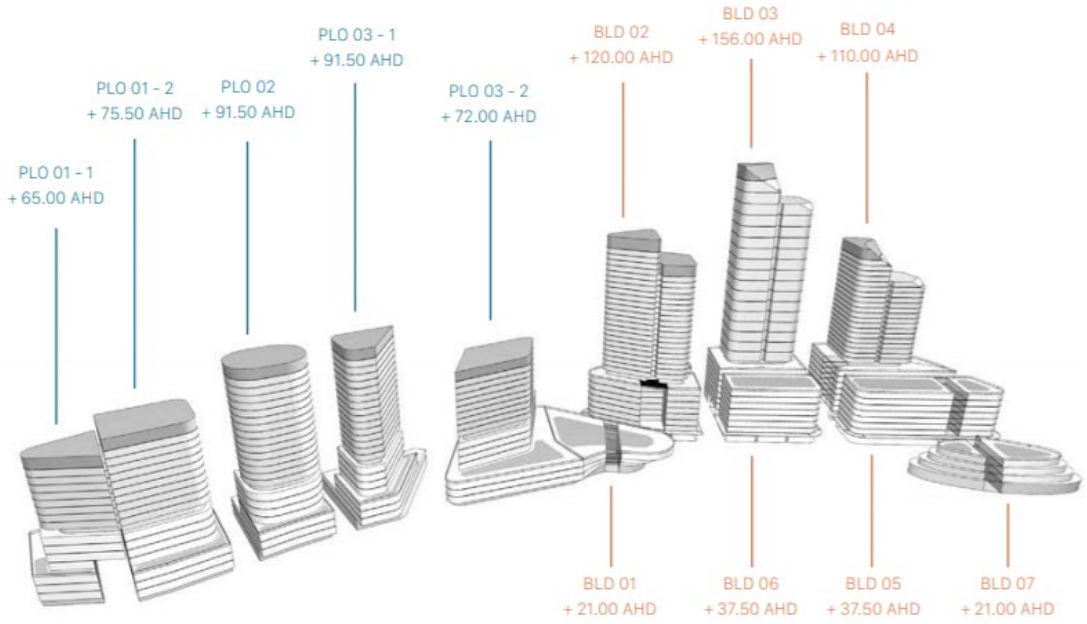
2) **Density**: The SSP Study identifies a maximum gross floor area (**GFA**) of 16,250 sqm for the site**. It is recommended that a maximum 26,000 sqm GFA is identified for the site**. This is commensurate with the recommended building height of RL121.1. Detailed urban design modelling and testing of building mass indicates that 16,250 sqm GFA does not work in unison with the maximum building height (RL91.5). A scheme which complies with the building height and built form controls exceeds16,250 sqm GFA. This represents a sub-optimum outcome whereby a permissible building massing is restricted by the maximum GFA. This fails to achieve orderly and economic use and development of the site.

3) **Non-residential floor space**: The SSP Study proposes a minimum non-residential GFA of 7,000 sqm for Celestino's site. Whilst the principle to deliver employment-generating land uses across the precinct is supported, the SSP Study does not foster an appropriate balance of non-residential floor space. Celestino recommends that a minimum 3,000 sqm non-residential GFA is identified for their site. The site-specific built form parameters of the Design Code do not allow appropriately sized or configured floor plates to accommodate non-residential uses above the podium. Further, Celestino strongly advocates for a more equitable distribution of non-residential floor space between the private landholdings and the Government land.

4) **Design Code flexibility**: The specific built form parameters for each development block should embed a flexible approach for the private landholdings and recognise that sites can be developed in different ways with different urban design outcomes. 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. This approach aligns with the principles embedded in the new Design and Place SEPP.

BUILDING HEIGHT

The SSP Study identifies a maximum building height of 91.50 metres (AHD) for Celestino's site (development block PLO 02) (refer below).



The SSP Study has determined building heights based on extensive analysis of the following:

a) *solar access requirements to existing and future open space*

b) *land morphology*

c) *height of surrounding buildings (foreground and background) and building typologies*

d) *height of the Anzac Bridge pylons*

e) *Obstacle Limitation Survey (OLS) height for aircraft movement, noting that the Pyrmont Peninsula Place Strategy (PPPS) identifies Blackwattle Bay as a taller building zone with potential building heights up to the OLS).*

The above principles and criteria for determining maximum building heights within Blackwattle Bay are supported.

Celestino strongly advocates that PLO 02 is capable of accommodating a maximum building height to RL121.1 (35 storeys).

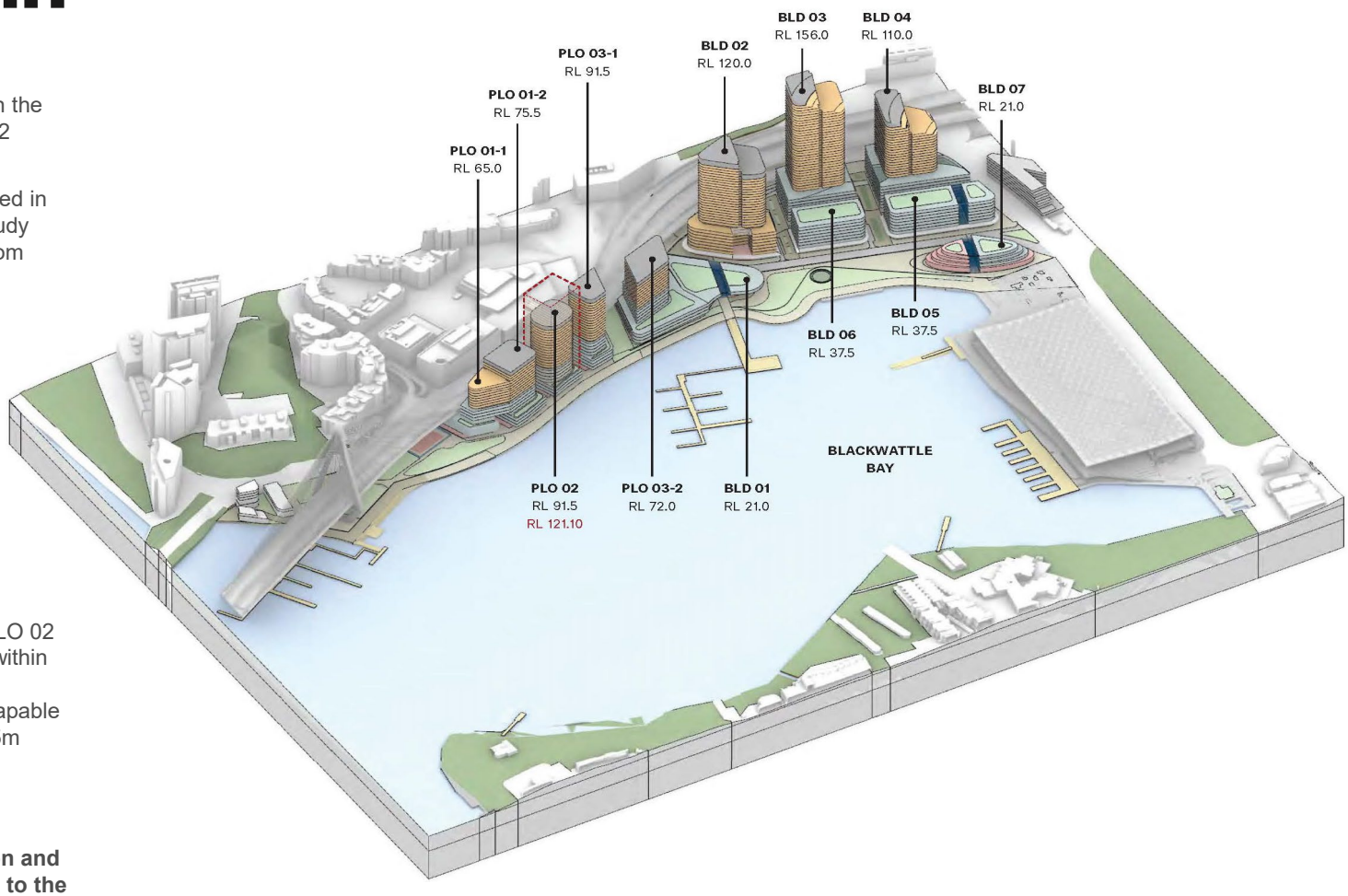
The proposed maximum height will ensure appropriate solar access protection is afforded to existing and new open spaces.

The following analysis demonstrates that a building height of RL121.1 for development block PLO 02 is consistent with the SSP Study principles and criteria for determining maximum building heights and appropriate relative to its the context.

BUILDING HEIGHT

The diagram illustrates the current masterplan model in the SSP Study, with the recommended building height for PLO 02 (RL121.10) dotted in red.

The heights of each building are described in RLs within the annotations. The SSP Study proposes a transition down of heights from the Government owned land buildings towards the Anzac Bridge.



The recommended building height for PLO 02 can accommodate a 35 storey building within the context of the future character of Blackwattle Bay, which is identified as capable of achieving building heights up to 155.5m (approximately 45 storeys).

The recommended building height of RL121.1 for 35 Bank Street is visually sympathetic to the Anzac Bridge pylon and avoids any additional overshadowing to the Glebe foreshore and Wentworth Park.

BUILDING HEIGHT

NO ADDITIONAL OVERSHADOWING TO GLEBE FORESHORE

The shadow diagrams on this page illustrate the shadow impact of a tower with a height to 35 storeys to Wentworth Park and the Glebe foreshore.

The building height of 35 storeys will not cause any overshadowing of Wentworth Park and Glebe Foreshore between 9am and 3pm on the winter solstice (a design standard for assessing shadow impacts).

BUILDING HEIGHT

OVERSHADOWING ASSESSMENT OF NEW OPEN SPACE

These shadow diagrams illustrate the additional shadowing of a 35- storey building to the proposed new open space on 21st June (mid-Winter).

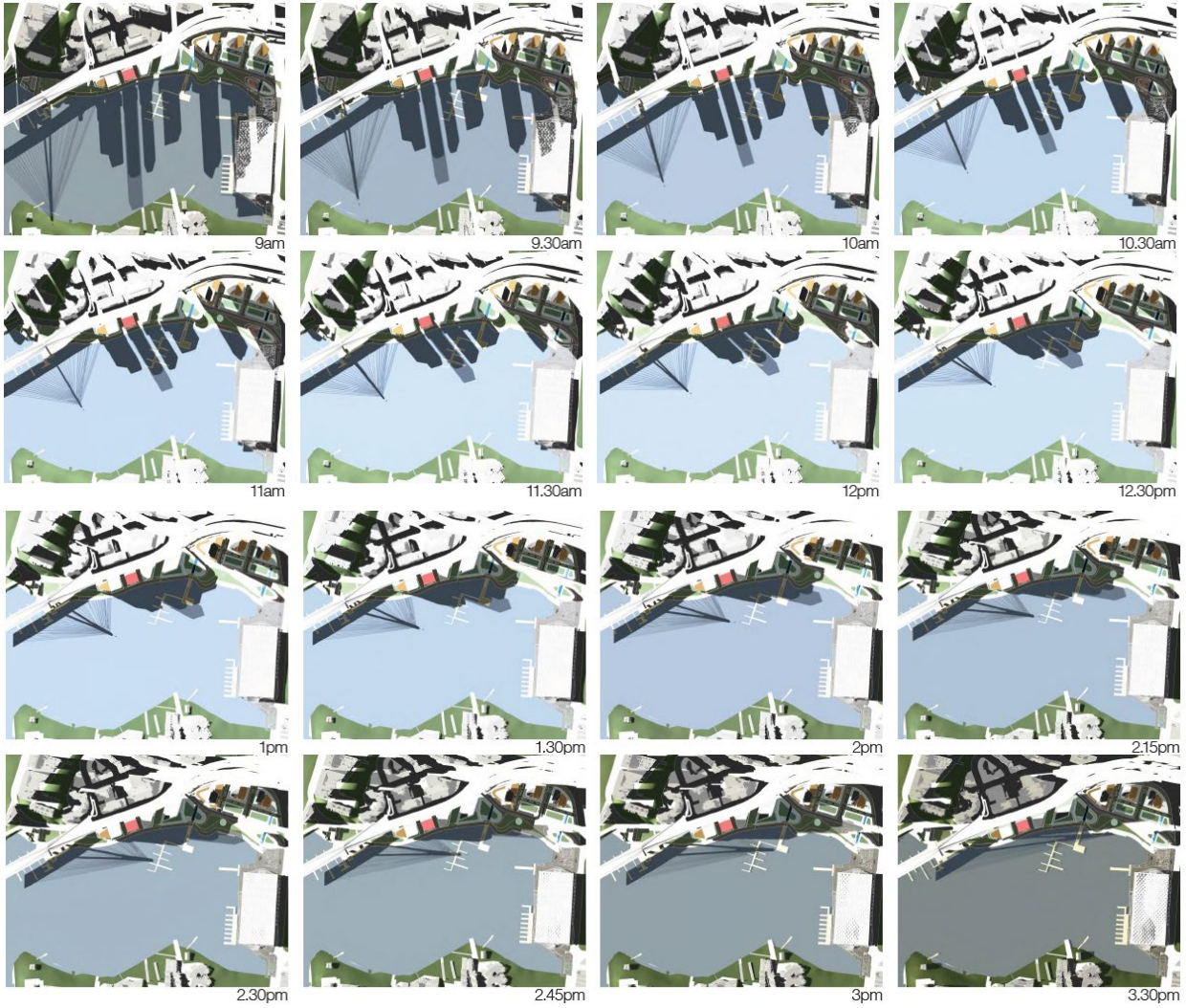
This analysis demonstrates:

- ❑ The buildings on the Government land overshadow the new open space between the hours of 9am and 1.15pm (a total of 4.25 hours).
- ❑ The proposed Celestino tower at RL121.1 casts additional shadow on the new open space only between the hours of 2.15pm and 3.30pm.

Proposed Tower Footprint

Additional shadow cast from Proposed Site (35 storeys)

Shadow cast from INSW Masterplan Model



BUILDING HEIGHT

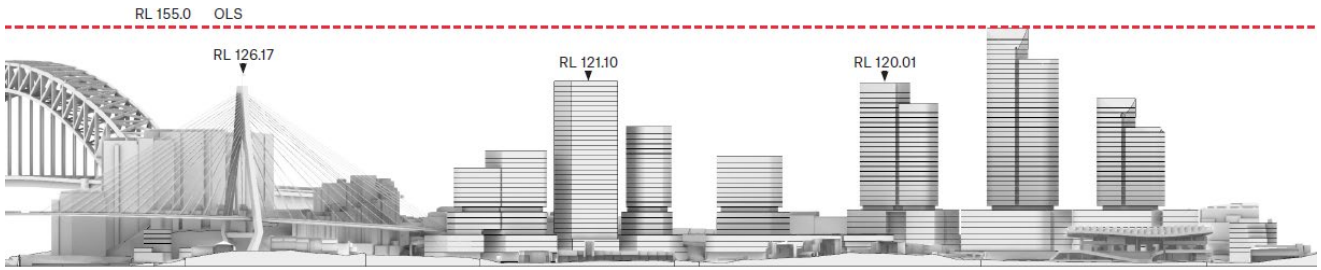
RELATIVE TO ANZAC BRIDGE PYLON

The privately owned sites are at their closest point some 125 metres from the eastern pylon of the Anzac Bridge.

From a variety of vantage points, including the approaches to Pyrmont and the City centre, and when viewed from waterfront locations around Blackwattle Bay the distance from the future towers on the private sites, the Anzac Bridge Pylons will maintain their visual prominence.

Furthermore, the Anzac Bridge Pylon design (comprising a special architectural and engineering design with reinforced concrete cable-stayed construction) is unique, making the pylons visually dominant over residential tower forms in the context.

The proposed building height of RL121.1 maintains an architecturally appropriate relationship and sensible design response to the Anzac Bridge Pylons, which will retain their visual prominence.



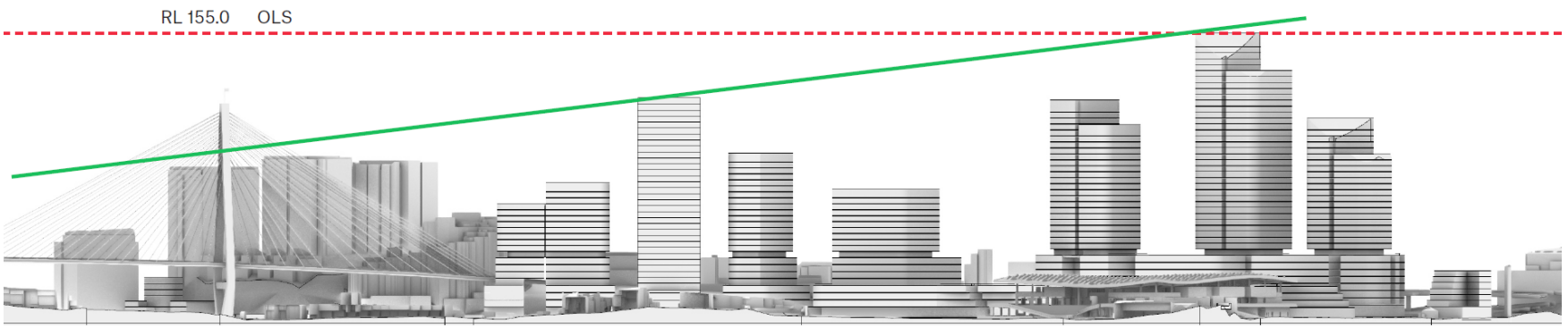
BUILDING HEIGHT

BUILDING HEIGHT PLANE TRANSITION

It is recognised that maximum building heights in Blackwattle Bay are constrained to the Obstacle Limitation Survey (OLS) at 156 AHD. However, the transition in building heights between Area 2 (the private landowners' land) and Area 3 (Government owned land) is abrupt and unmerited.

The recommended building height of RL121.1 at Celestino's site respects the context and scale of the future character of Blackwattle Bay and is well below the OLS.

The recommended building height would represent an appropriate height plane transition between the Government owned land to the east (with maximum building heights of 156m) and the Jacksons Landing residential towers to the west (with maximum building heights of 90m).



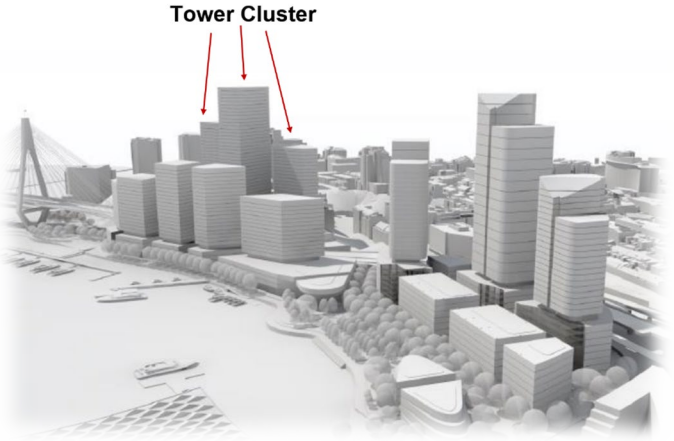
BUILDING HEIGHT

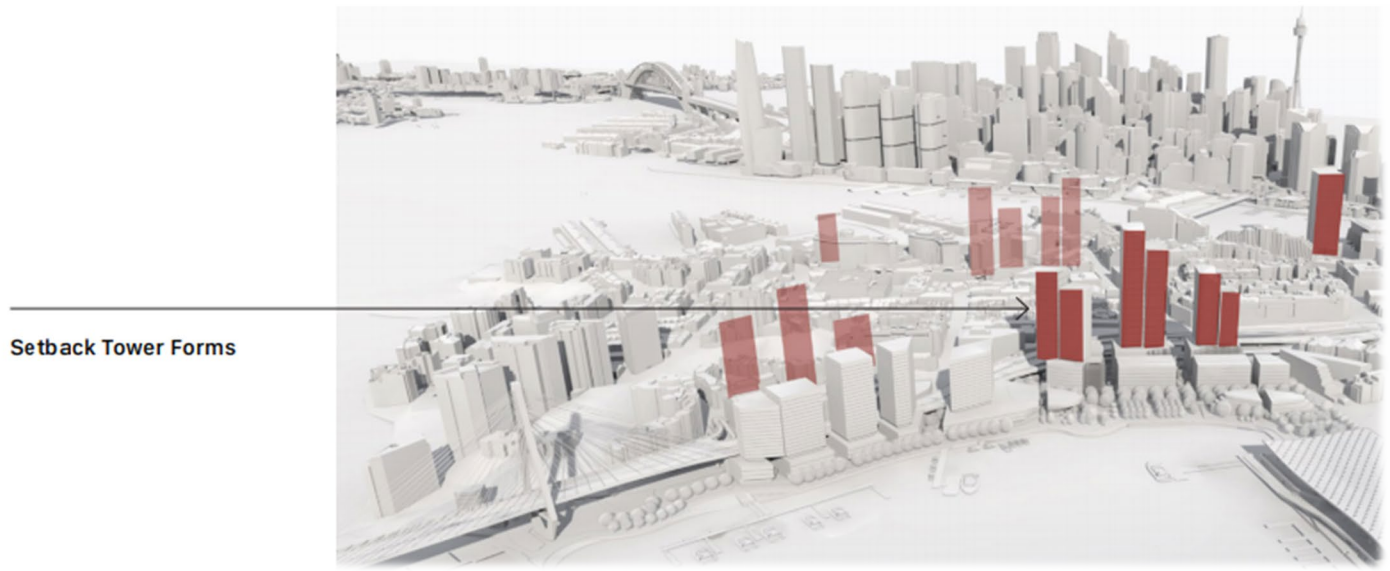
BLACKWATTLE BAY TOWER CLUSTER

The SSP Study is accompanied by an Urban Design Statement (prepared FJMT Studio) which includes a built form analysis of Blackwattle Bay to inform and justify the building height strategy. The Statement contains graphics that identify a tall tower cluster opposite Celestino's site and generally bound by Bank Street, Miller Street, and Quarry Master Drive.

The SPP Study should acknowledge that the private landholdings (including the site) are within a taller building cluster. The private landholdings were identified in the consultation document Revitalising Blackwattle Bay as a location for tall buildings.

The extension of this indicative tall building cluster to land on the southern side of Bank Street (including Celestino's site) represents a consistent and logical approach to the future growth of Pyrmont Peninsula that envisages significant transformation and urban renewal in Blackwattle Bay. A 35-storey building on Celestino's site is not out of scale or character with the tall building cluster approximately 40 metres to the north of the site in Banks Street.





RESIDENTIAL LAND USE

The SSP Study forecasts the growth of the Blackwattle Bay precinct with approximately new 2,800 residents and approximately 1,550 new residential dwellings.

Celestino considers that the SSP Study noticeably falls short on recognising the potential for private landholdings to make a significant contribution to meeting the housing demands of the projected population growth.

Concurrent with the maximum building height of RL91.5, the minimum 7,000 sqm non-residential floor space identified for the site does not enable development to optimise its suitability to accommodate future population growth.

Celestino's site is capable of achieving mixed use and high-density housing options, with good access to existing and future employment opportunities, infrastructure, and services. The site occupies a location of high amenity with waterfront views and access, and access to a future ferry (100m), Metro station (600 metres walking distance), and existing Light Rail station (350 metres) all in close proximity.

Residential floorspace within the private landowner sites will play a significant contribution in the creation of a true 24-hour economy and community in Blackwattle Bay, providing for surveillance and activation of the precinct, and accommodating a significant portion of the residential growth forecast for the precinct.

It is anticipated that the underlying demand for new dwellings in key sites such as Blackwattle Bay will be strong over the next twenty years and beyond.

The SSP Study should afford greater recognition that private landholdings, such as Celestino's site, are ideally suited to delivering high quality residential offerings. By virtue of their size, configuration, and single-ownership, these landholdings can respond to future housing needs in Blackwattle Bay and deliver new housing supply, diversity, choice, and quality,

DPIE is strongly recommended to acknowledge that the creation of new waterfront living opportunities will play a vital role in the activation of Blackwattle Bay and the financial feasibility of delivering not only the developments themselves, but the public benefits envisaged to be delivered by proponents.

MINIMUM NON-RESIDENTIAL FLOOR SPACE

Celestino supports the site's rezoning from B3 to B4 Mixed Use. The wider rezoning of Blackwattle Bay acts as a catalyst to deliver significant economic benefits, including 5,500 ongoing jobs, new 1,550 residential dwellings, and an extensive network of open space.

The rezoning of Blackwattle Bay is integral to facilitating future land use change in line with the Pyrmont Peninsula Place Strategy which envisages the future of the precinct as a place that attracts businesses and employees, visitors, and tourists along the connected waterfront, linking the new Sydney Fish Market east to the Western Harbour, Walsh Bay, and beyond.

Celestino supports a balance between non-residential and residential uses to ensure that future growth of Blackwattle Bay as a "new urban quarter focused on knowledge-based jobs and supplemented with cultural and entertainment, visitor and tourism, retail and residential uses."

Celestino is committed to providing employment-generating land uses to help realise the Innovation Corridor, meet growth demand for jobs, and facilitate the expansion of knowledge-based industries around the Central Business District.

Celestino objects to the minimum quantum of non-residential GFA identified on their site (7,000 sqm) on the following grounds:

1. Size and configuration of floorplates

The size and location of Celestino's site and the site-specific built form parameters of the Design Code do not allow sufficiently sized floor plates to accommodate non-residential uses above the podium. Market insights indicate that floorplates of the size limited by the built form controls would not be attractive or commercially viable to 'anchor' commercial tenants.

Retail and food and beverage offerings above Level 1 of the podium will be commercially unviable unless activity can be drawn through these levels via the presence of a large anchor tenant, such as a major retailers. The size of floor plates on Celestino's site are not conducive to attracting major leading retailers.

2. Quantum of non-residential uses

Commensurate with its rezoning to B4 Mixed Use, the site is suitable to accommodate a certain quantum of non-residential floor space. Indeed, the concept design envisages retail and commercial uses at the ground and podium levels to activate the ground plane and provide employment generation.

However, 7,000 sqm non-residential GFA would cap the residential GFA at 9,250 sqm. This non-residential GFA is excessive and has significant implications for economic feasibility and viability of future development which is contingent on an appropriate balance of commercial and residential land uses.

Celestino recommends that a 3,000 sqm non-residential GFA control applies to their site.

Any additional non-residential GFA above Level 1 would be a loss leader, in that revenue generated from the asset disposal equates to the same or less than the capital expenditure to produce the asset. Non-residential activity above Level 1 would need to offer a major draw card attractor where patrons spend considerable quantum of dollars elsewhere within the development to be economically viable. For example, a cinema attracts patrons that utilise restaurants and other food and beverage offerings and creates an active extended hour precinct. Celestino's site is not conducive to larger format entertainment, retail, or commercial land uses of this nature; this activity is only viable on the ground and first floor levels.

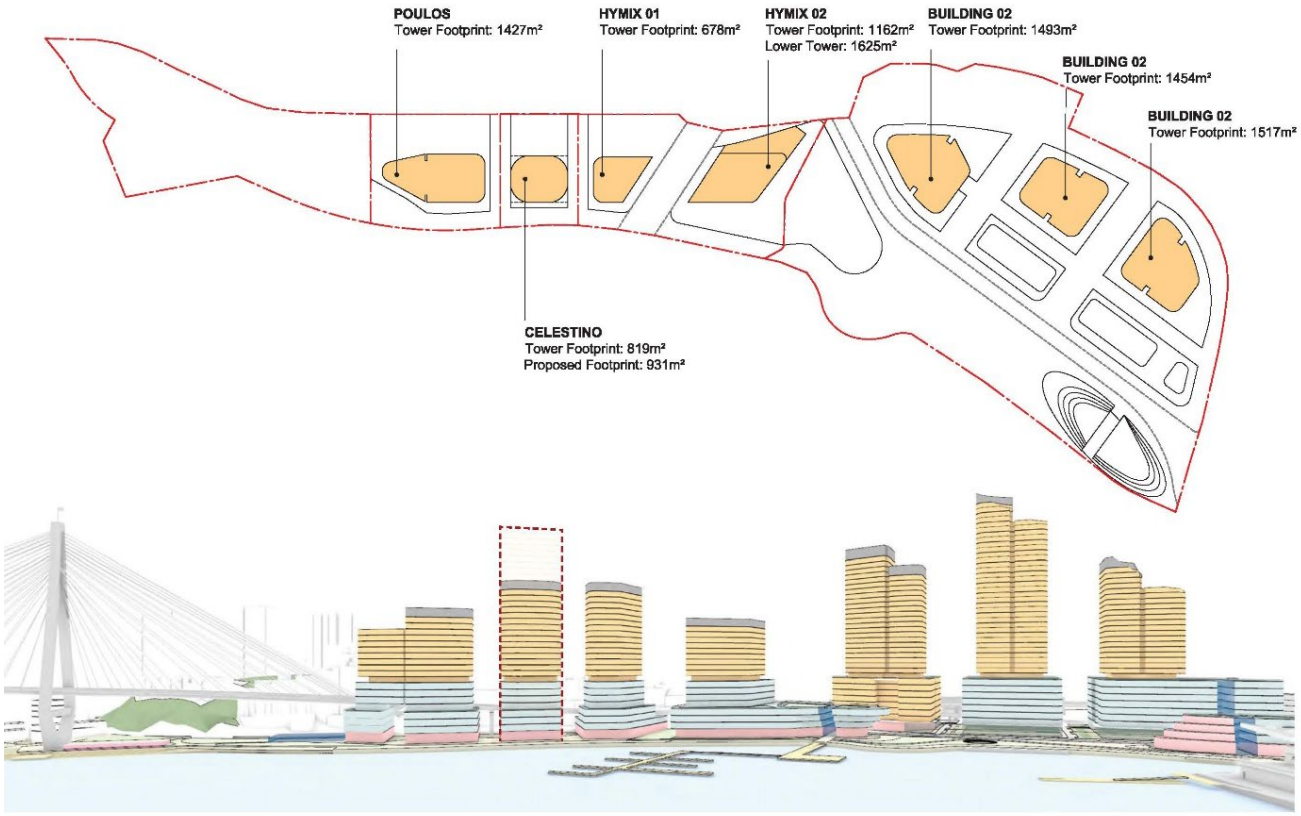
MINIMUM NON-RESIDENTIAL FLOOR SPACE

3. Attractiveness of Government land

Other development blocks in Blackwattle Bay, namely the Government owned land, are better suited to accommodating commercial / employment-generating land uses with greater scope for larger commercial floorplates and a more attractive offering to future tenants.

The tower footprint sizes for Government owned buildings are considerably larger than Celestino's footprint (819 sqm). As illustrated on this diagram, the tower footprints of Government owned land range from 1,454 sqm to 1,517 sqm.

It is reasonable to forecast that future tenants to the innovation precinct, for instance knowledge-industries and universities, will have a strong preference for larger floorplates. The Government land is also within closer proximity to the new Metro station and new public open spaces compared to the private landholdings, further adding to the amenity and desirability for future commercial tenants and operators.



MINIMUM NON-RESIDENTIAL FLOOR SPACE

4. Hybrid commercial / residential scheme

The requirement to provide 7,000 sqm non-residential floor space on the site would result in a hybrid land use development, with an indicative GFA split comprising:

- ❑ Non-residential – 7,000 sqm
- ❑ Residential - 9,250 sqm

A hybrid building with this indicative GFA split would be commercially unviable and a poor land use outcome for a site of this limited size.

The integration of commercial and residential land uses at this quantum of GFA would present significant complexities in terms of commercial management and stratum leasing arrangements.

Market preference for large, corporate tenants is to lease commercial floor space as a standalone commercial premises, rather than an asset that is encumbered by complexities associated with residential leases and other strata restrictions.

5. Distribution of non-residential floor space

The following comparative analysis demonstrates that the development blocks on Government-owned land are identified for a lower minimum quantum of non-residential floor space than the private owned land (including Celestino's site).

The above indicates that as a proportion of the overall maximum GFA, the minimum non-residential GFA identified for the private land and the Government owned land is as follows:

- ❑ **Private land: 52%** (37,350 sqm non-resi GFA / 71,950 sqm total maximum GFA).
- ❑ **Government land: 45.5%** (73,875 sqm non-residential GFA / 162,125 sqm total maximum GFA).

Whilst the underlying principle to deliver employment-generating land uses to create a diverse mixed-use precinct is commended, the SSP Study does not foster an appropriate balance of non-residential floor space. Celestino strongly advocates for a more equitable distribution of non-residential floor space between the private landholdings and the Government land.

FLOOR SPACE ALIGNMENT WITH BUILDING HEIGHT

It is recommended that the maximum GFA for Block PL02 is 26,000 sqm, commensurate with a maximum building height of RL121.1.

The SSP Study identifies a maximum 16,250 sqm gross floor area (**GFA**) for Block PL02.

DPIE is considering two options to govern the maximum GFA on specific sites, either by:

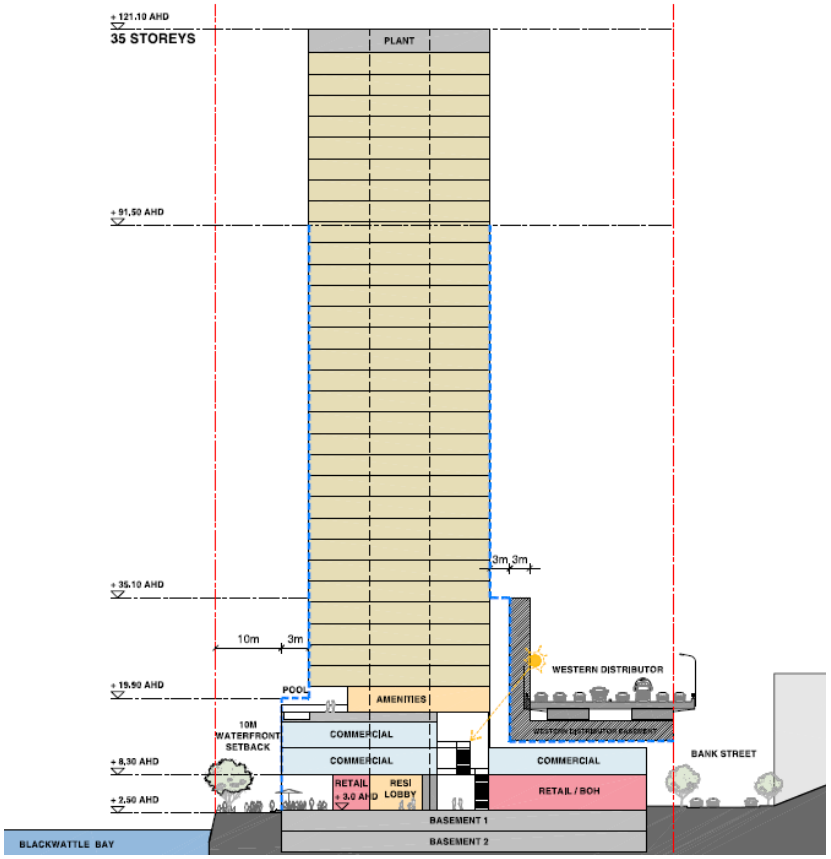
- ❑ Implementing a FSR control; or
- ❑ Introducing a site-specific control stating the maximum GFA.

Based on the site area of 2,971 sqm, the GFA maximum (16,250 sqm) equates to a 5.5:1 FSR.

Bates Smart has undertaken urban design modelling and testing of building mass and floor space capacity for an indicative scheme within the maximum GFA. This modelling is compliant with the minimum non-residential GFA and site-specific built form controls set out in the Design Code. This analysis indicates that the 16,250 sqm GFA does not work in unison with a RL91.5 building height.

The modelling demonstrates that a scheme which complies with the maximum building height and other built form parameters exceed the maximum 16,250 sqm GFA. This represents a sub-optimum outcome whereby the permissible building massing is restricted by a maximum GFA limitation. This fails to achieve orderly and economic use and development of the site.

It is evident that there is a misalignment between the GFA and building height controls identified in the SSP Study. **Floor space controls should be commensurate with building height controls**.



It is recommended that the SSP Study identifies a FSR control or site-specific provision that identifies the maximum GFA on the site based on the merits of the built form massing.

The FSR control should allow future development to utilise a building envelope established by the maximum building height and other built form parameters (including boundary setbacks and separation).

RESIDENTIAL AMENITY

It is acknowledged that the Western Distributor imposes certain physical limitations to development on the private landholdings in terms of site planning and tower footprints. The potential impacts on environmental amenity, including noise and air quality, are also recognised.

However Celestino rejects the principle applied in the Precinct Plan that residential uses in Area 2 are not to be provided below the 9th storey in order to mitigate potential impacts of noise and air quality of the Western Distributor.

The SPP Study should acknowledge technical and urban design strategies that can be adopted to ensure high quality environmental conditions for residential uses within proximity to busy roads.

Residential uses can be suitable within the lower levels of the tower through:

- careful site planning and building orientation;
- innovative urban design treatments and façade design options (including mechanical assistance, low height protected windows, ventilation plenums etc).

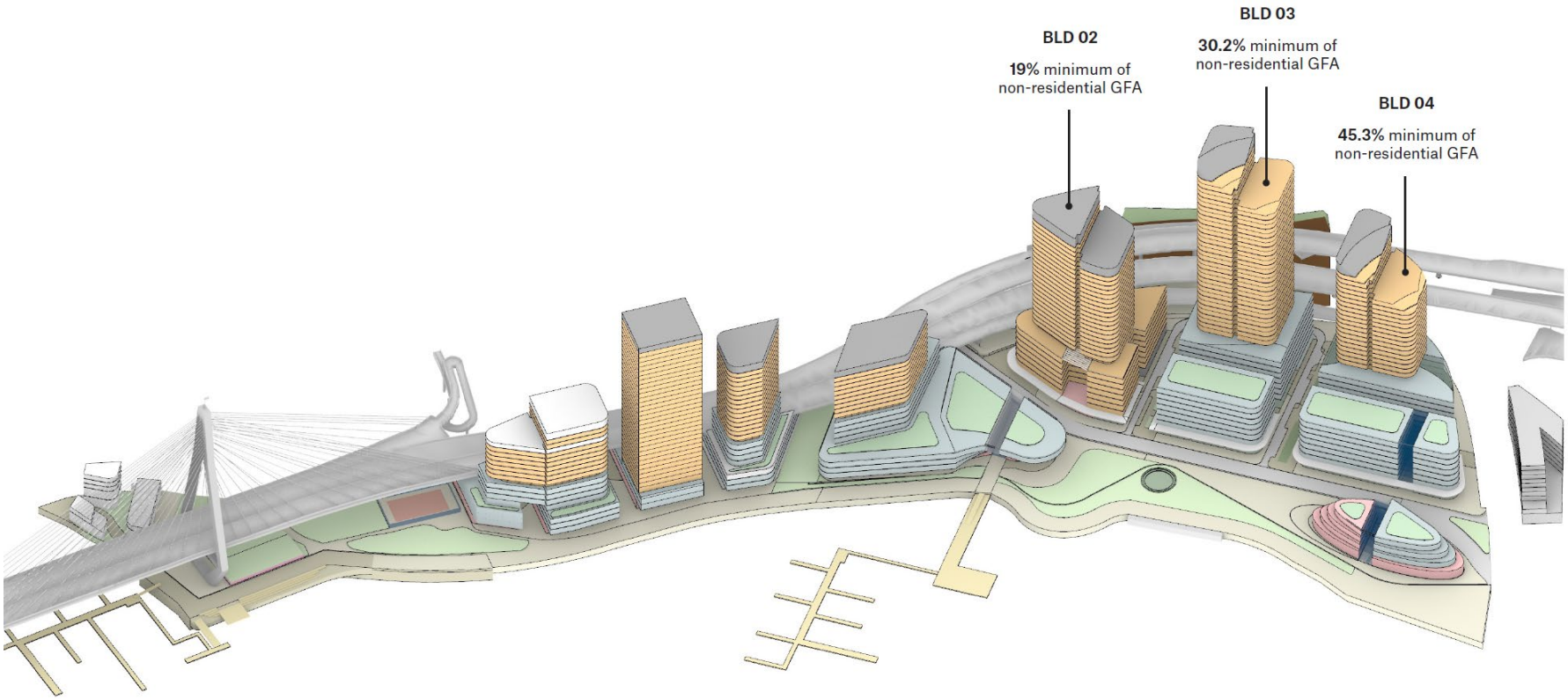
Technological and urban design solutions can be implemented to provide residents with options to open windows and doors for natural ventilation or close windows and doors but maintain access to fresh air.

Further, it is noted that development blocks on Government land are within close proximity to the Western Distributor and identified for similar and lower proportion of non-residential GFA in comparison to Celestino's site. Specifically, as a percentage of the overall maximum GFA, the minimum non-residential GFA for development block BLD02, BLD03, and BLD04 is 19%, 30.2%, and 45.3% respectively [Refer to the graphic on the following page].

This analysis indicates that development blocks on Government land are identified as suitable locations to deliver a similar and higher proportion of residential accommodation compared to Celestino's site, notwithstanding their proximity to the Western Distributor.

MINIMUM NON-RESIDENTIAL FLOOR SPACE

GOVERNMENT LAND NON-RESIDENTIAL GFA



RESIDENTIAL AMENITY

These images illustrate recent developments within Sydney where residential uses have been accommodated within lower levels on sites fronting major arterial roads.

Vista Grande | Tony Caro

Opera Residences | Tzannes

Gantry Camperdown | Bates Smart

BUILT FORM CONTROLS

The draft Design Code identifies built form parameters for each development block within Blackwattle Bay (refer diagram).

Celestino makes the following recommendations:

- ❑ A more flexible approach to the application of built form controls will encourage place-led urban design to achieve high quality outcomes.
- ❑ With specific consideration to the design of residential towers, it is critical that the size and orientation of floor plates achieve high quality internal layouts, outlook and views, visual and acoustic privacy, private open spaces, and separation from boundaries and neighbours.
- ❑ The site-specific building setback controls must foster a flexible approach to the application of the Apartment Design Guide for those levels comprising of residential accommodation in terms of recommended building separation distances to neighbouring buildings. The proposed 6m setback to the site boundaries is supported.
- ❑ It is recommended that the Design Code aligns with the principles embedded in the new Design and Place SEPP which seek to:
  - ✓ Foster flexibility to address site-specific contextual factors (such as solar access, natural ventilation, common open space and parking);
  - ✓ Encourage innovative architecture and urban design to achieve high amenity residential outcomes; and
  - ✓ Promote urban design that responds place-led and performance-based criteria in order to stimulate the development sector and deliver better housing and better places.

FLEXIBILITY FOR BUILDING SETBACKS

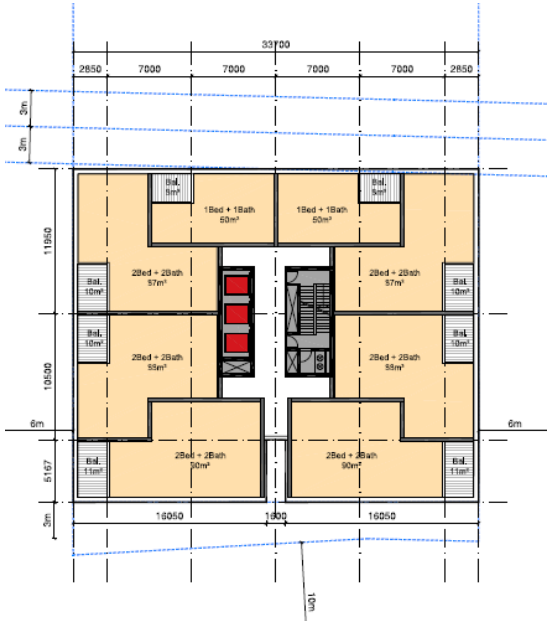
Flexibility in the application of built form controls enable development to achieve place-led design outcomes that respond to site-specific contexts.

It is critical that the size and orientation of residential tower floor plates achieve high quality internal layouts, outlook and views, visual and acoustic privacy, private open spaces, and separation from boundaries and neighbours.

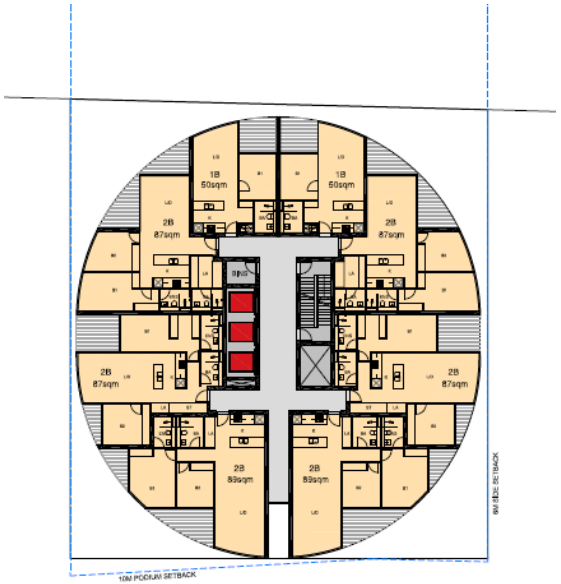
The diagrams below compare a 'compliant' tower floor plate layout vs a floor plate that encroaches into the 3m + 3m setback to Western Distributor.

The two schemes achieve similar net GFA. However, the 'flexible' floor plate that encroaches into the 3m + 3m setback to Western Distributor achieves the following urban design outcomes:

- ❑ A floor plate size of 930 sqm, which is generally consistent with the average residential tower floor plate size at Jacksons Landing.
- ❑ Building setbacks which adopt a form and shape that effectively manages building separation and visual privacy between neighbouring residential towers.
- ❑ Allows better amenity between towers.
- ❑ Visual privacy to adjoining land is best achieved through the tower shape and in the orientation of apartments that provide oblique rather than direct views of neighbouring buildings.



'Compliant' Tower Floorplate



Floorplate Encroaching Western Distributor

OTHER ITEMS

DESIGN EXCELLENCE PROVISIONS

- Development will be required to exhibit design excellence by committing to a competitive design process in accordance to:
  - the City of Sydney Competitive Design Policy (without Design Excellence bonuses); or
  - NSW Government Architect competitive design policy.
- Design excellence provisions will be stipulated in a site-specific clause in the Sydney LEP).
- The SSP Study should acknowledge the suitability and capacity of the private landholding sites to achieve high density development commensurate with taller buildings, where it is supported by robust urban design analysis and can deliver design excellence outcomes.
- Celestino recommends that the statutory planning framework for Blackwattle Bay incorporates provisions that 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.

INFRASTRUCTURE CONTRIBUTIONS

- The SSP Study provides a new LEP clause requiring the Planning Secretary's approval of a proposed approach to delivery of infrastructure prior to approving significant development.
- In deciding whether to approve the approach, the Planning Secretary is required to consider:
  - impact of development on existing designated State public infrastructure and need for additional public infrastructure;
  - cumulative impact of development with other development that has, or is likely to be, carried out in surrounding areas;
  - steps taken to address those impacts, including whether a planning agreement has been, or will be, entered into contributing to designated State public infrastructure.
- Contributions will be made through a Planning Agreement.
- Celestino support the commitment to investigate and pilot new and innovative funding mechanisms to secure additional public benefits and infrastructure. However, Celestino advocate for a clear and transparent mechanism for identifying the public benefits to which developers must contribute in order to provide clarity and certainty to investment decisions.

CONCLUSIONS AND RECOMMENDATIONS

Celestino and its consultant team of Bates Smart and Urbis thank DPIE for the opportunity to provide comments on the Blackwattle Bay State Significant Precinct Study

We appreciate the work that has gone into preparing the SSP Study.

This submission provides DPIE with recommendations that we believe will assist in the finalisation of the SSP Study to revitalise Blackwattle Bay into a world class waterfront precinct.

RECOMMENDATIONS FOR BLACKWATTLE BAY SSP STUDY

This submission makes the following recommendations for the planning framework, in relation to the 31-35 Bank Street site:

1. Building height: A maximum building height of RL121.1 is applied to the site. This is consistent with the height principles of the SSP Study.

2. Density: A maximum gross floor area (GFA) of 26,000 sqm is identified for Celestino's site. This GFA is commensurate with the recommended maximum building height of RL121.1.

3. Non-residential floor space: A maximum non-residential GFA of 3,000 sqm is recommended for Celestino's site. Celestino strongly advocates for a more equitable distribution of commercially viable non-residential floor space between the private landholdings and Government land (which is appropriate for larger commercial floor plate sizes). [If a maximum GFA of 26,000 sqm is applied to Celestino's site, 7,000 sqm non-residential GFA is more equitable in comparison to the quantum on the Government land].

4. Design Code flexibility: 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. This approach aligns with the principles of the new Design and Place SEPP.

URBIS

URBIS.COM.AU

31-35 BANK STREET
PYRMONT

CONCEPT VISION PRESENTATION

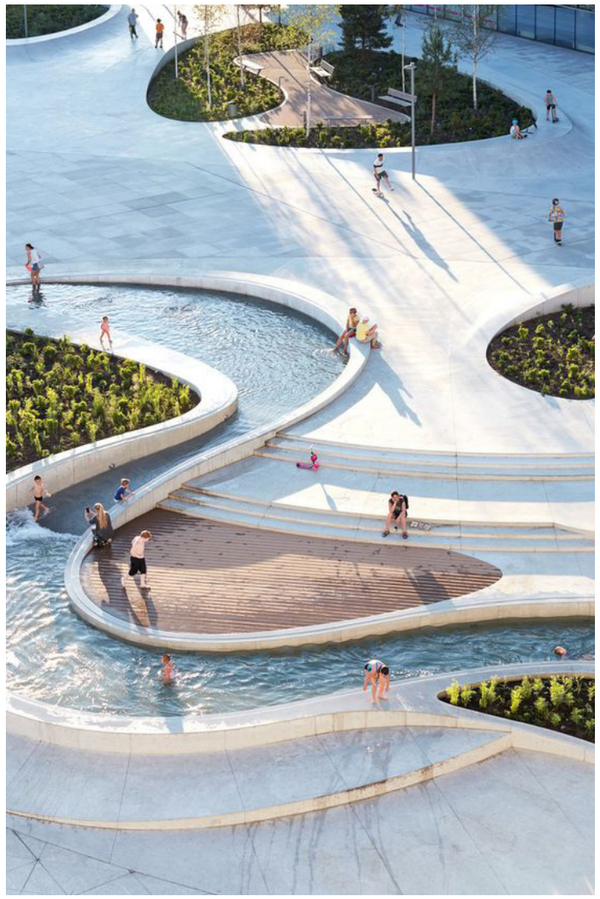
16.08.2021

plus
architecture

OUR CONCEPT VISION
FOR BLACKWATTLE BAY

31-35 BANK ST PYRMONT
CONCEPT VISION PRESENTATION

CREATING A PLACE FOR THE COMMUNITY TO GATHER.



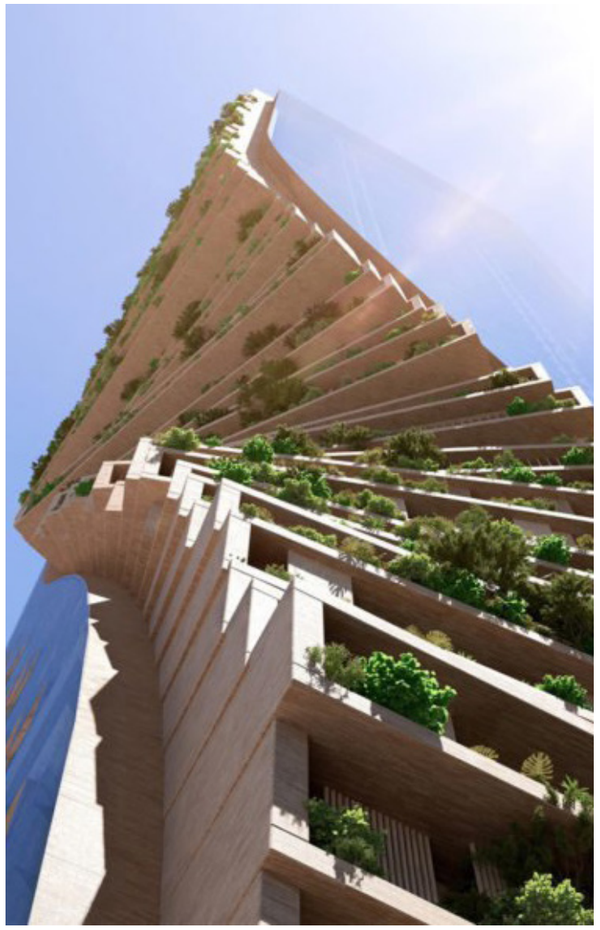
DESIGN THINKING

DIVERSITY OF LANDSCAPE SPACES

GREEN ROOFS

PUBLIC PLAZAS

NATURE CONNECTION



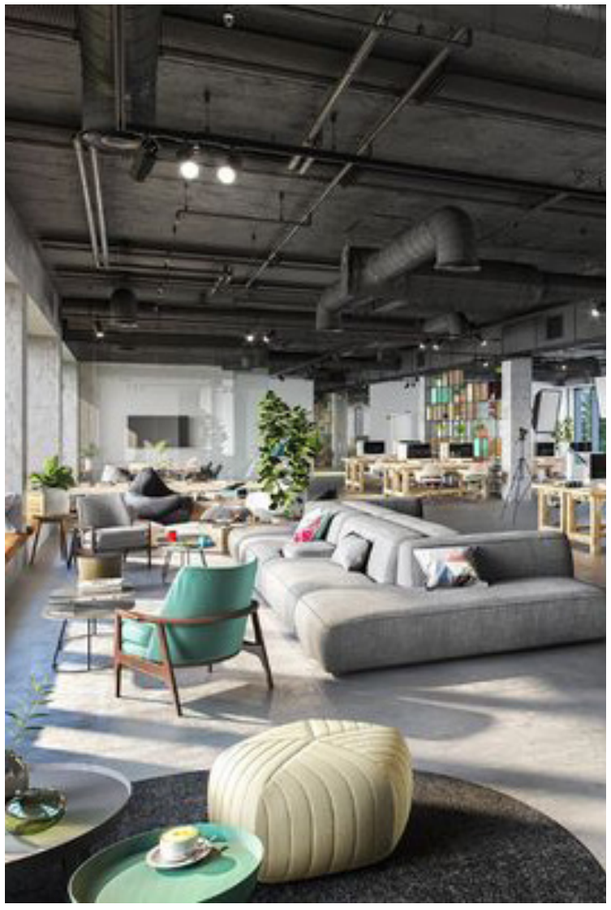
VERTICAL GREEN

A DIVERSE AND ACTIVATED PODIUM

A PLACE TO SHOP AND RELAX.

AN OFFICE AT YOUR DOORSTEP.

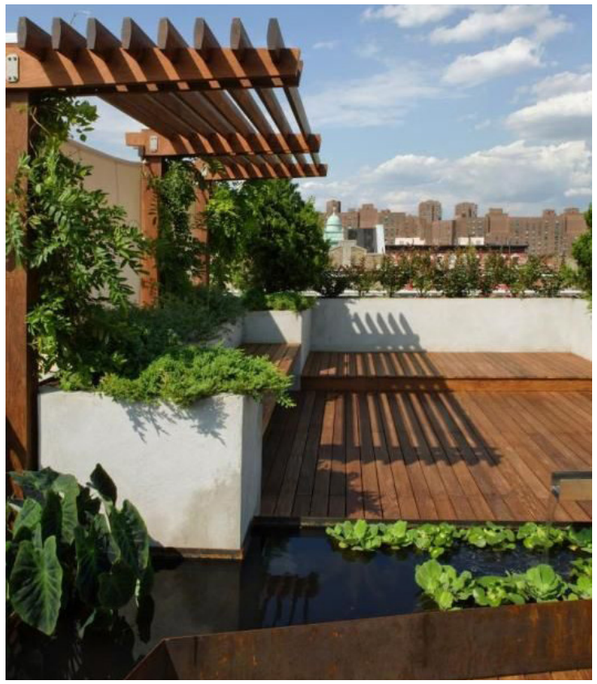
INNOVATION HUB

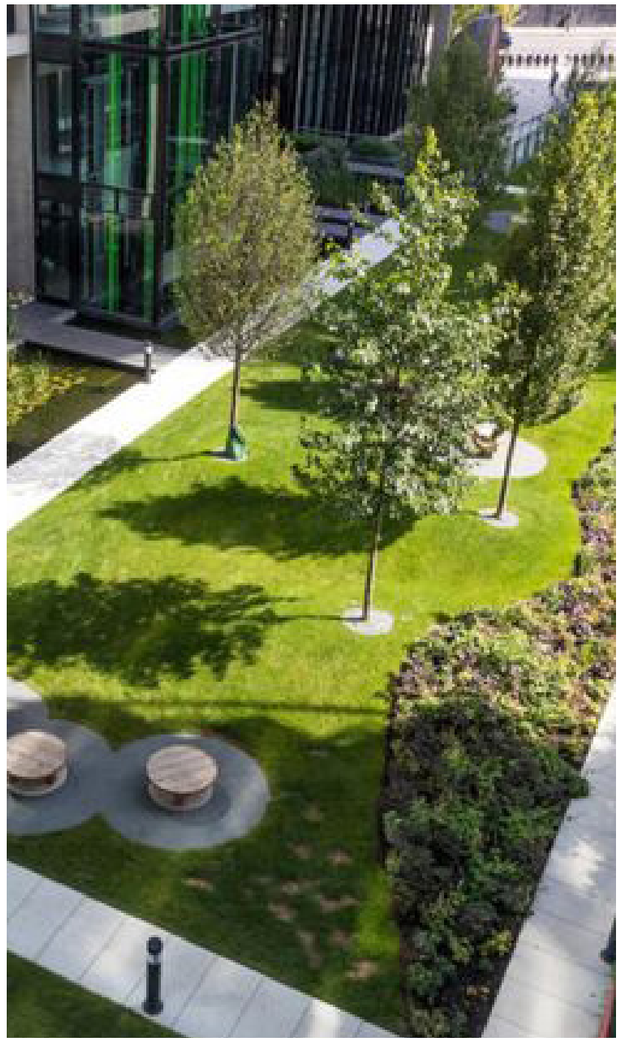


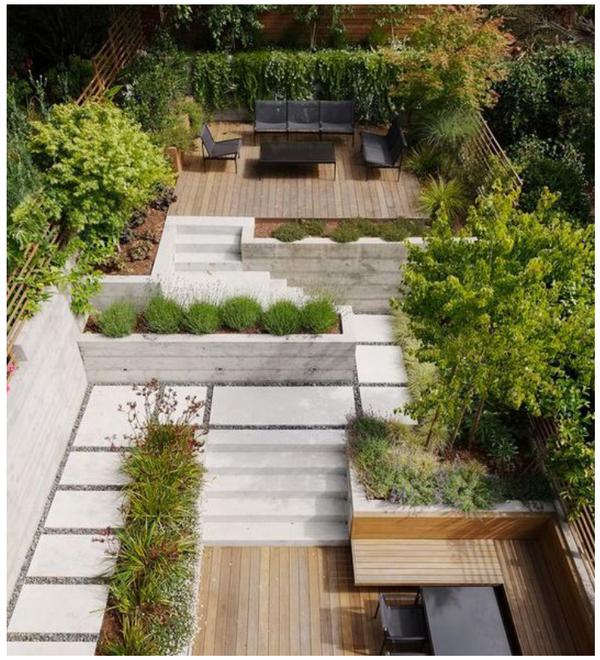
A MULTIPURPOSE SPACE FOR ALL.

DESIGN THINKING

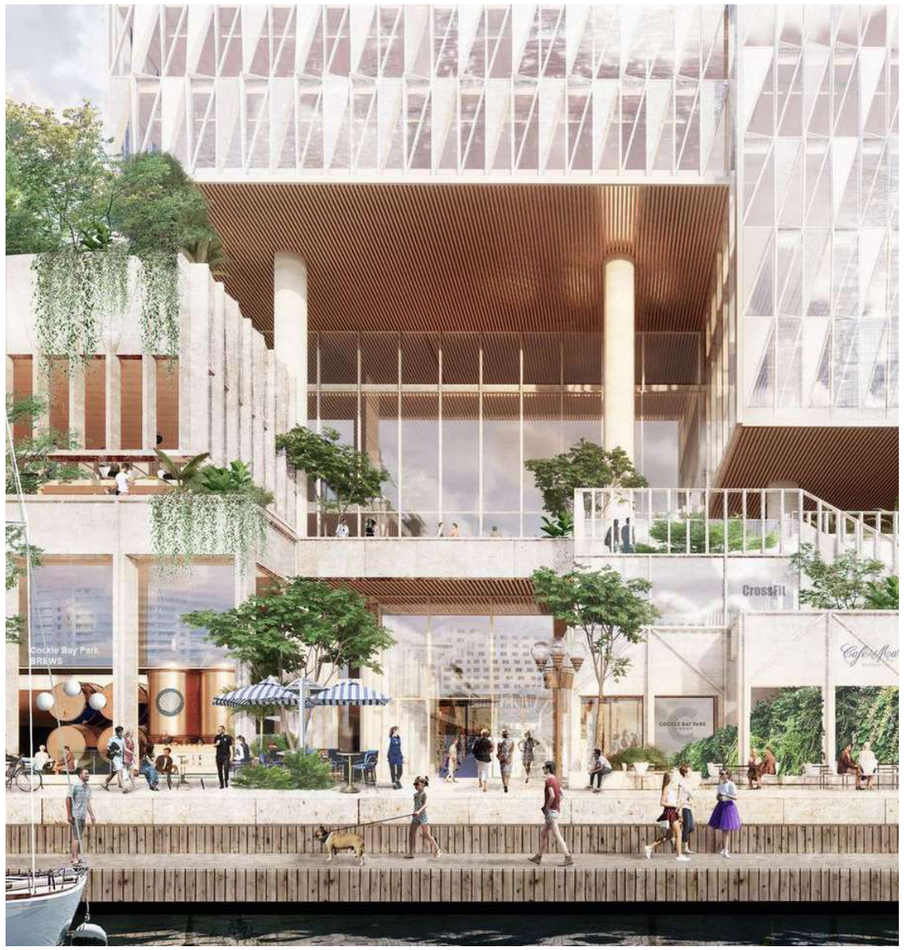
RESIDENTIAL COMMUNAL SPACES

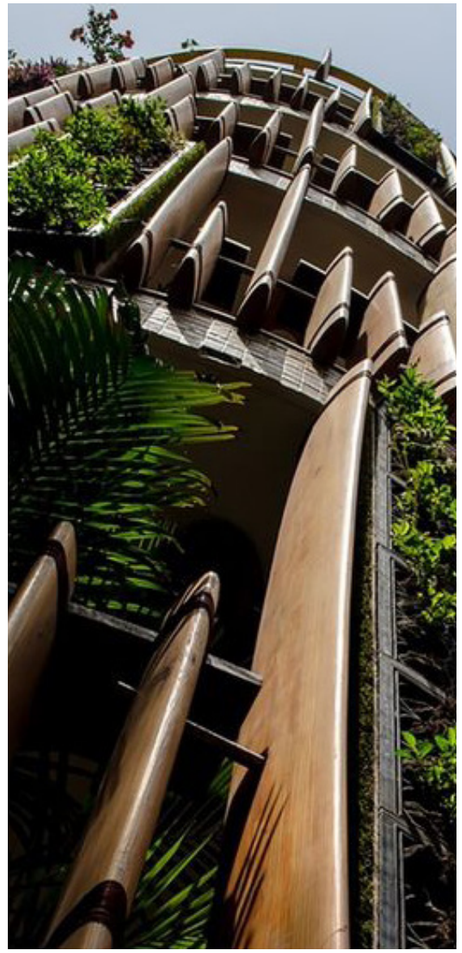




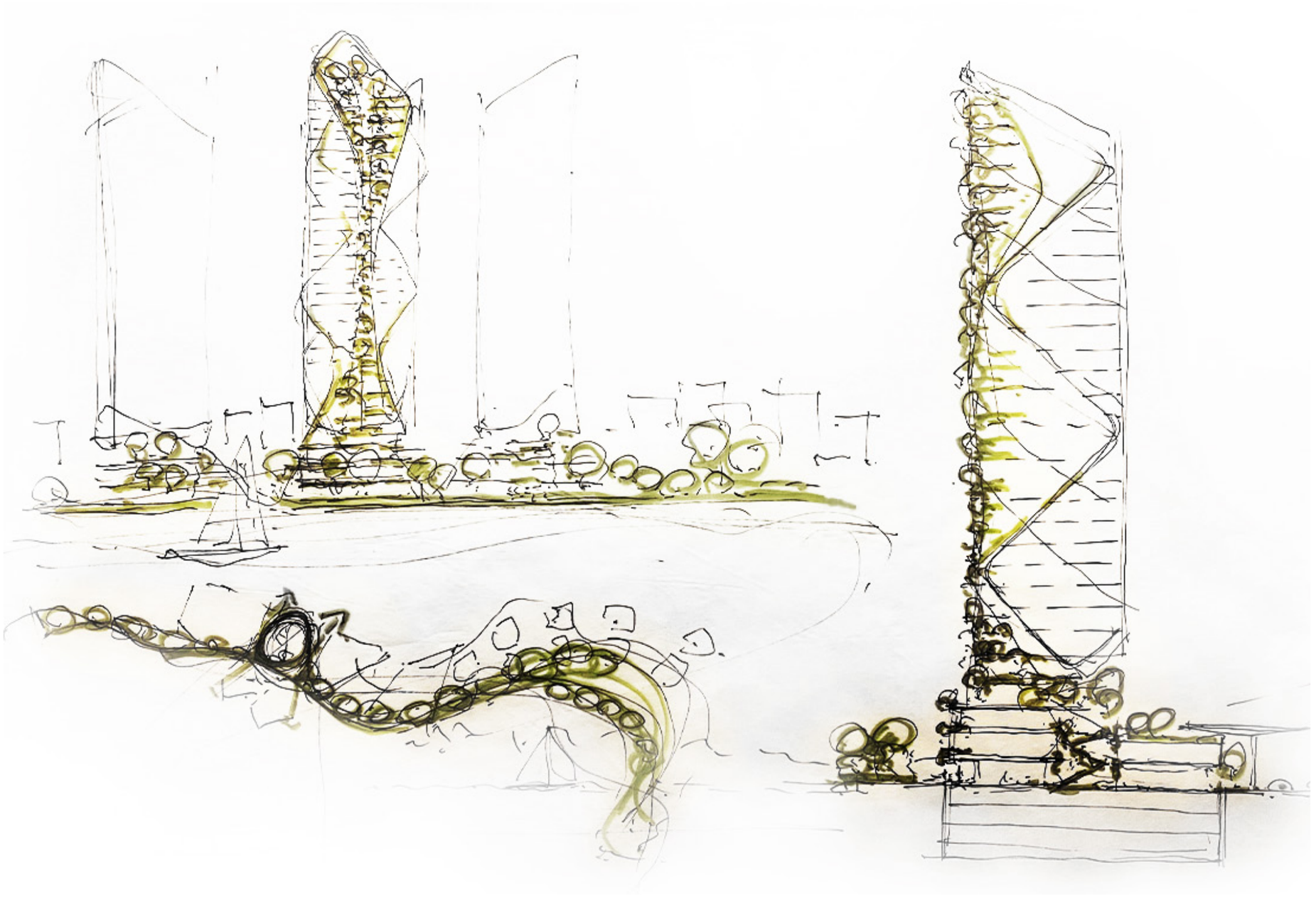


ARCHITECTURAL VISION





CONCEPT VISION



ACTIVE GREEN PODIUM

LANDSCAPE

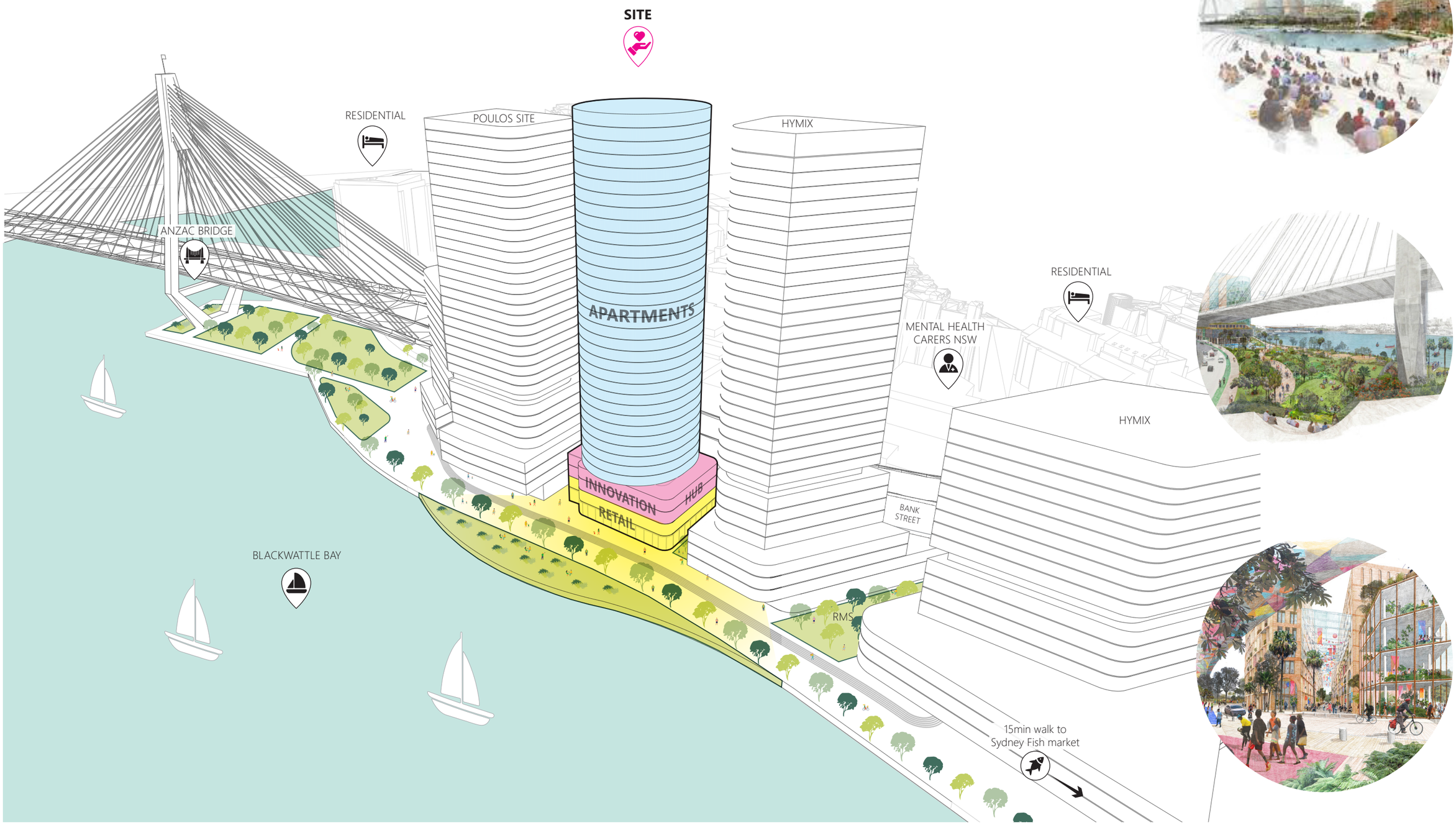
PUBLIC PLAZA

WATER PLAY

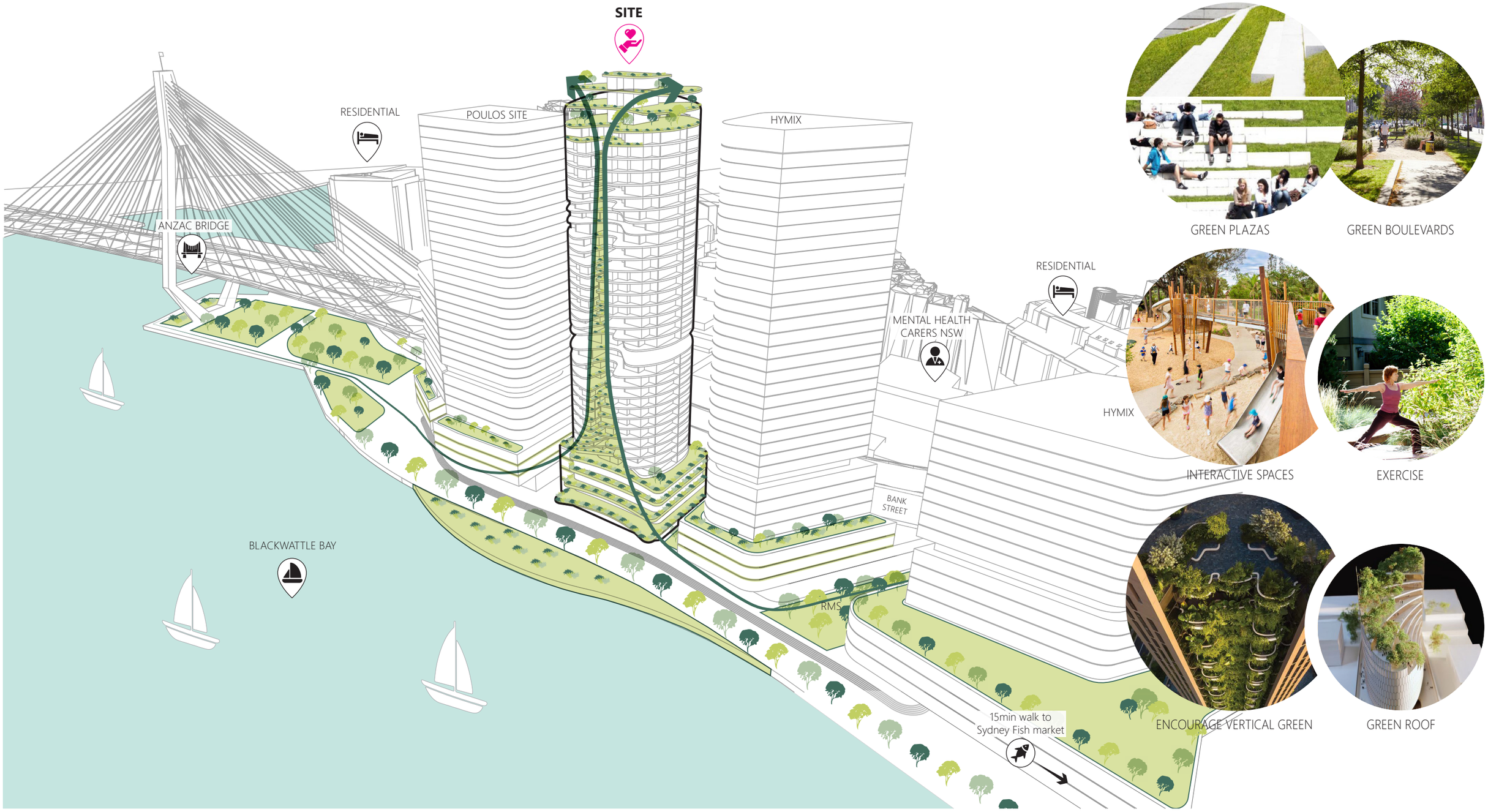
PUBLIC PARK

GREEN

EXISTING


SITE
RESIDENTIAL
POULOS SITE
HYMIX
ANZAC BRIDGE
APARTMENTS
INNOVATION HUB
RETAIL
MENTAL HEALTH CARERS NSW
RESIDENTIAL
HYMIX
BANK STREET
BLACKWATTLE BAY
RMS
15min walk to Sydney Fish market

LAYERING & LANDSCAPE INTEGRATION



GREEN PLAZAS

GREEN BOULEVARDS

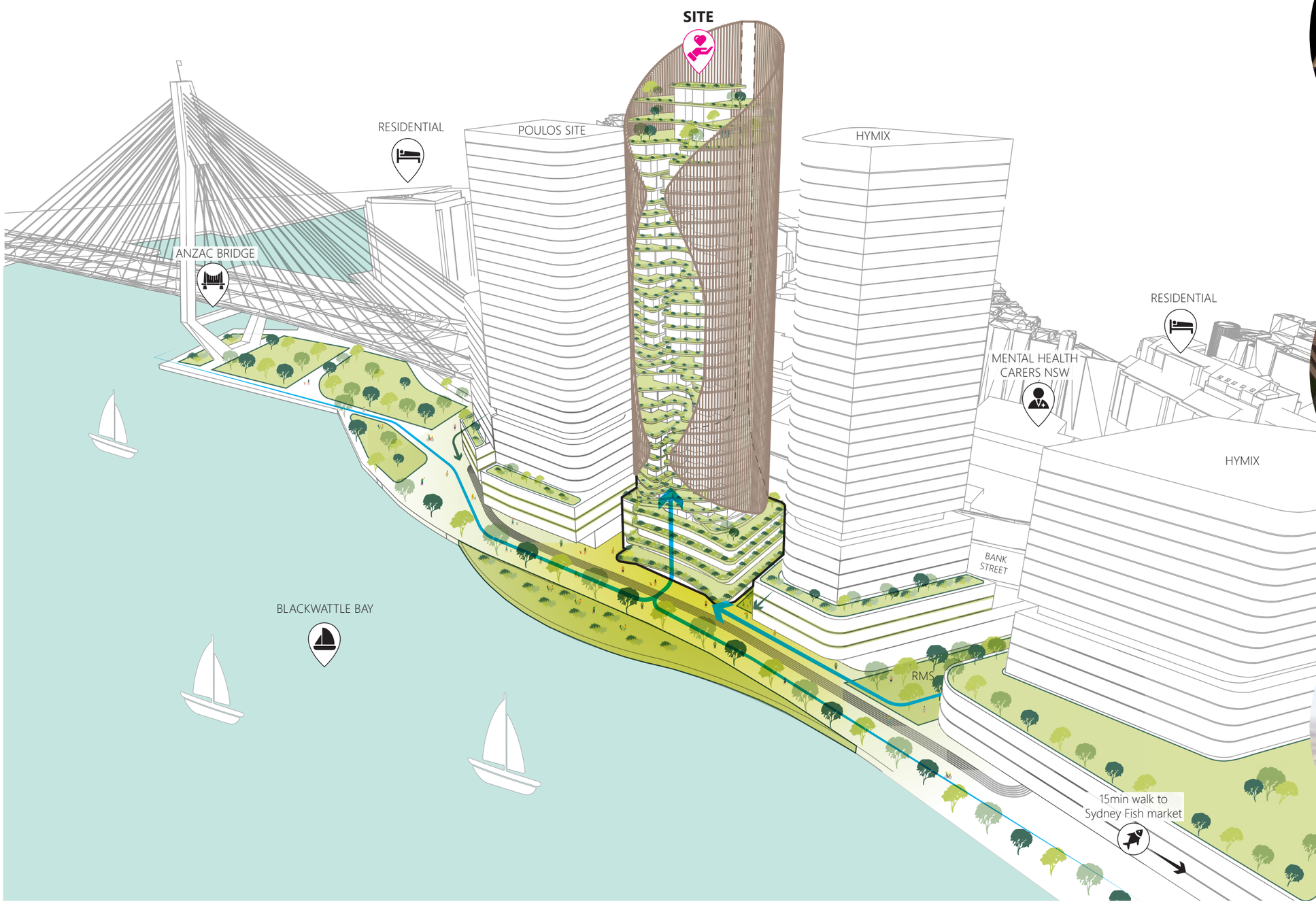
INTERACTIVE SPACES

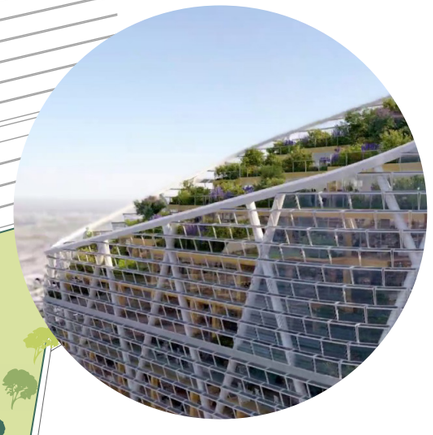
EXERCISE

ENCOURAGE VERTICAL GREEN

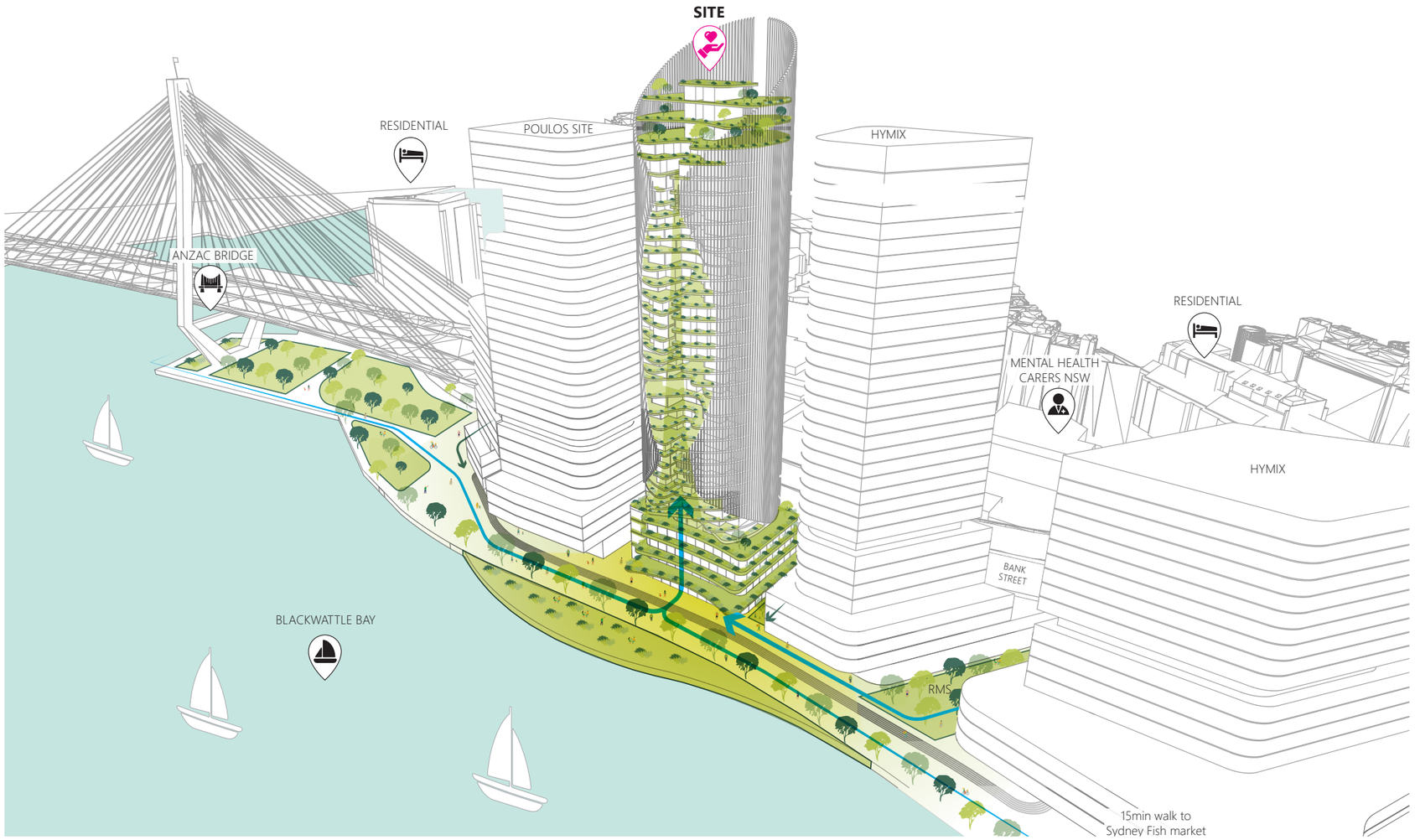
GREEN ROOF

PROPOSED

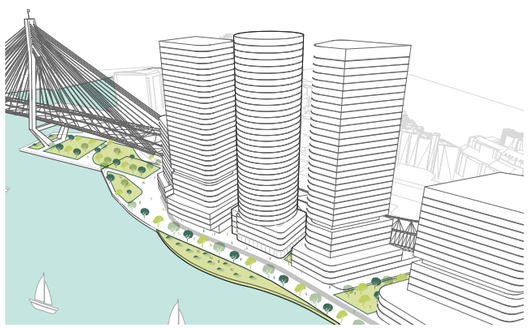

SITE
RESIDENTIAL
POULOS SITE
HYMIX
ANZAC BRIDGE
RESIDENTIAL
MENTAL HEALTH
CARERS NSW
HYMIX
BANK
STREET
BLACKWATTLE BAY
RMS
15min walk to
Sydney Fish market



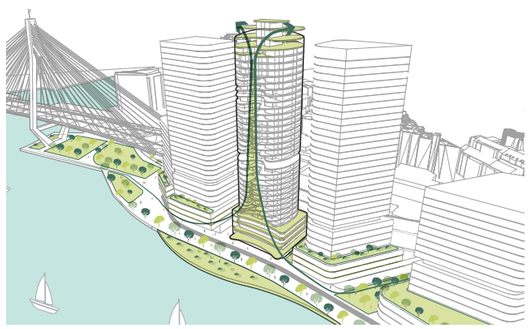
CONCEPT



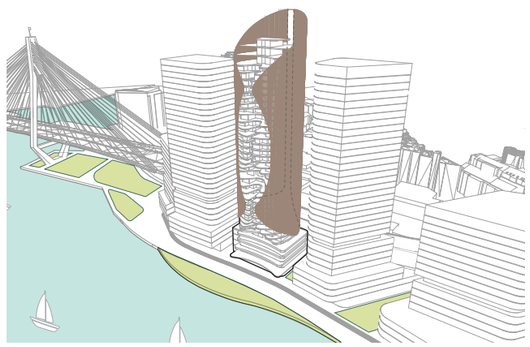
PROPOSED



EXISTING



LAYERING OF GREEN



PROTECTIVE SKIN

DIVERSE VERTICAL VILLAGE

ACTIVE GREEN PODIUM

LANDSCAPE

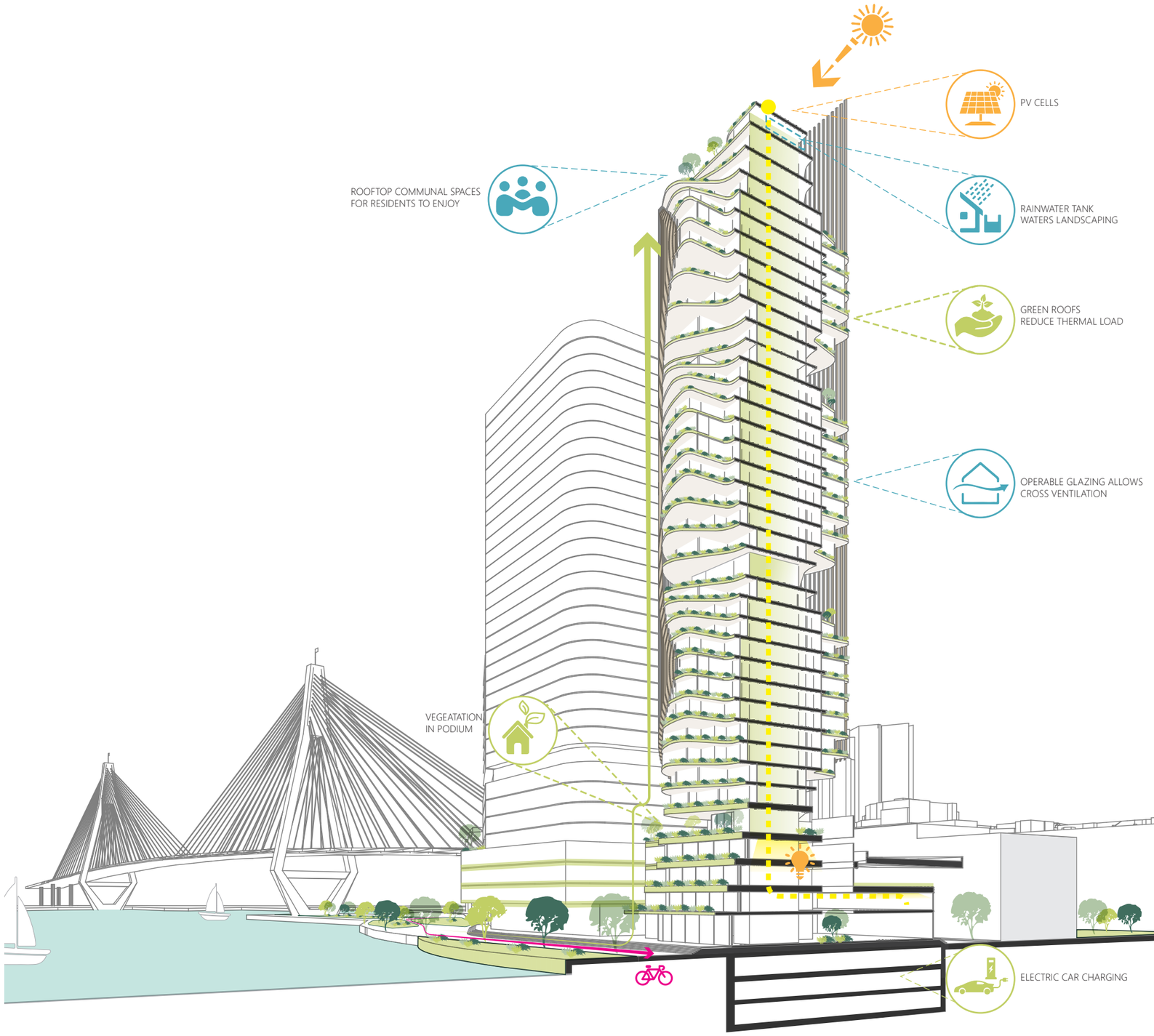
APARTMENT VIEWS

WATER

PUBLIC PARK

EXISTING GREEN

SUSTAINABILITY



SUSTAINABLE MATERIALS

CARBON NEUTRAL
OPPORTUNITY

SMART BICYCLE STORAGE

ELECTRIC CAR CHARGE, CAR
SHARE, UBER DROP OFF

GREEN ROOFS

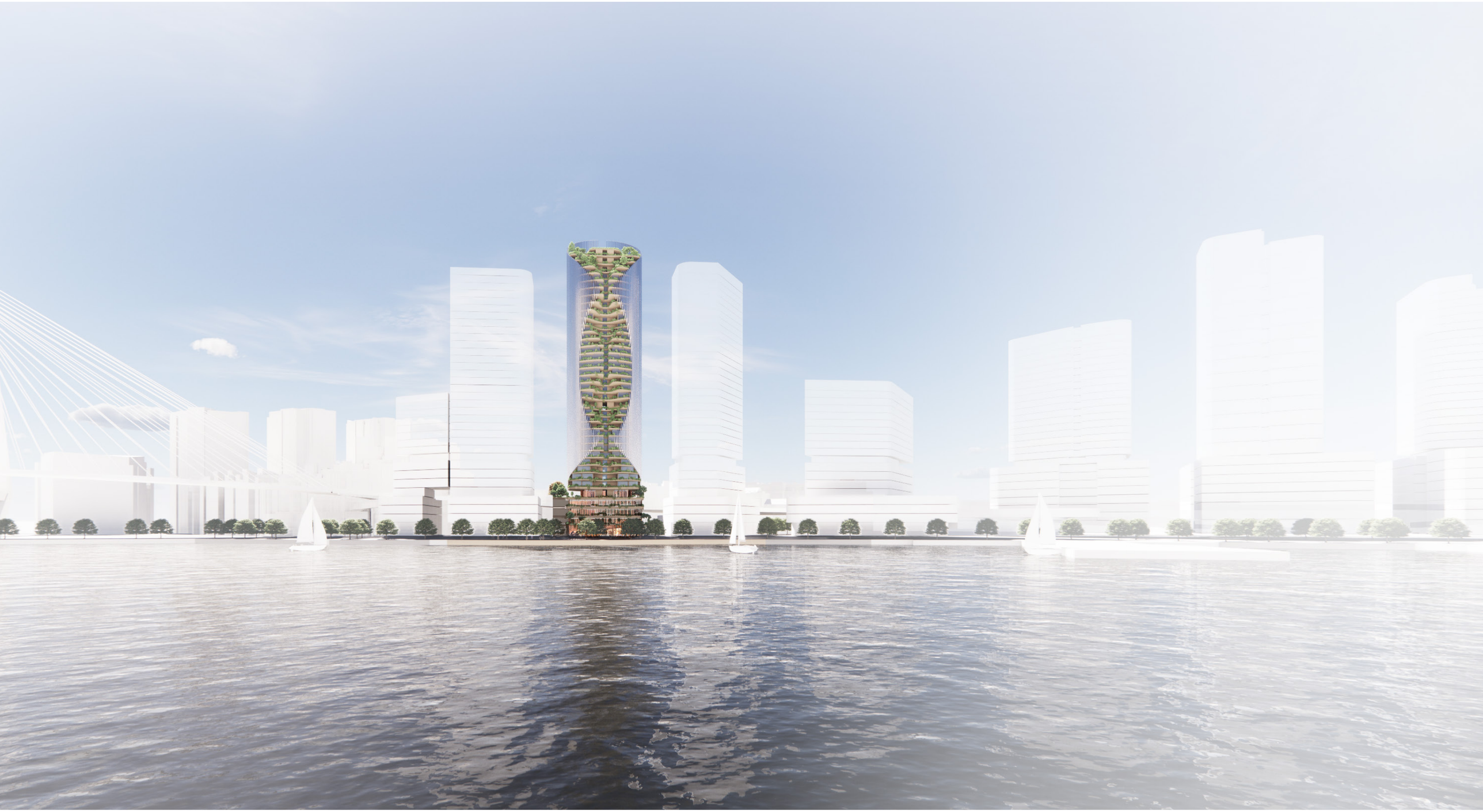
GREEN WALLS

31-35 BANK ST PYRMONT
CONCEPT VISION PRESENTATION

JOB NO. 20592
DATE 16/08/2021

plus architecture
440

ARTIST IMPRESSION

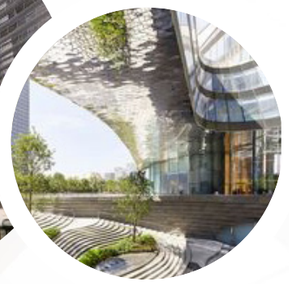


ARTIST IMPRESSION

GREEN ROOF

TREES

PODIUM ACTIVATION



TRANSPARENCY

GREEN CURVES

FACADE CURVES

ARTIST IMPRESSION

ARTIST IMPRESSION

ARTIST IMPRESSION

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Sceats

Pyrmont

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1 August, 2021

Submission on the Blackwattle Bay State Significant Precinct Study

I have lived in Pyrmont for 21 years, one of the second wave of people moving to this great suburb from elsewhere in Sydney, Australia and overseas. I live in a 12-storey building next to the Glebe Island Bridge approach, close to the foreshore, but not dominant, with Waterfront Park to the East providing a large stretch of open space, enabling the residents South of the park to enjoy sunshine in winter, and views of the harbour. I bought into a Master Planned Community Development, ensuring a degree of certainty about building heights, footprints, FSRs. There were also opportunities to effect changes to individual projects, including the redesign of Waterfront Park, and 1 Distillery Drive, ensuring that the Western Escarpment was transformed into Urban Bushland, thus preserving some rock shelters with First Nations significance as described in Attachment 27 to the BBSSPS.

I have received a letter from Malcolm McDonald, Executive Director, Eastern Harbour City, Dept of Planning, Industry and Environment (DPIE) (6 July, 2021) outlining changes to the planning and assessment regime, including the Sydney LEP 2012 as well as State Environmental Policies to accommodate the proposed dramatic departures from a range of controls as outlined in the Blackwattle Bay State Significant Precinct Strategy (BBSSPS) and Attachment 10. I strongly object to the changes to planning controls enabling the redevelopment of the site without going through the existing processes, especially in the absence of City of Sydney endorsement of the Blackwattle Bay Strategy. In particular, I object to the repeal of the requirement under SREP26 that deals with the protection of and enhancement of views and the scenic quality of the foreshore and waterways, especially in the light of the dramatic, and negative impact of buildings up to 45-storeys high on residential and visitor amenity in terms of over-shadowing and loss of views.

My comments on the BBSSPS are as follows:

1.0 Height and Building Form – The imposition of a wall of buildings up to 45-storeys high along the Blackwattle Bay foreshore is incompatible with the existing building forms of Pyrmont and does not represent good planning, let alone comply with the Pyrmont Peninsula Place Strategy (PPPS) Direction 2 – Development that complements and enhances the area. The Pyrmont Peninsula is already walled off from the CBD on its Eastern side by the developments at Darling Harbour which turns its back on Pyrmont. Similarly, the Blackwattle Bay proposals will wall off most of the suburb from the West. The buildings will have a significant visual impact and deprive many homes of sunlight, especially in winter. Views from Glebe will also be adversely impacted, noting that building forms near the Glebe foreshore have been kept to a modest height and scale, compatible with good design and planning. I strongly oppose the height and scale of buildings as presented in the BBSSPS

2.0 The Economic Case – It appears that a justification for the scale of buildings in the BBSSPS is the need for the Government to recoup sufficient funding to pay for the new Sydney Fish Markets (SFM) development from the sale of public land on which the SFM sits currently. As

this new venture will attract many visitors and provide benefit to a number of industries, including the tourism industry (if/when Australia is again open for international visitors), the cost of the new facility can be shared with the broader beneficiaries. I also doubt the demand projections provided by Treasury for commercial and residential accommodation, given the many recent statements by experts and Ministers regarding the likelihood of the changing work practices eg working from home, being irreversible in the longer term post-pandemic. The business case for this strategy should be released for public scrutiny and comment before the Government commits to its implementation.

3.0 Public Open Space – I am appalled that Infrastructure NSW is proposing that the development of the public domain will be nominated "exempt development" and won't require development consent or assessment, subject to meeting appropriate amenity and other criteria (and who decides what's appropriate?). The design, assessment and approval of public open space must go through the normal processes and involve the local community and stakeholders eg dragon boat clubs in genuine consultation from the very beginning of the planning process. We have been waiting for the Bank Street park since 2004, and the community has been deeply involved in discussions with government agencies, including the development of the 2006 Bank Street Master Plan, thrown out by the incoming Coalition Government, along with those for Rozelle and Blackwattle Bays.

I support the removal of the temporary Blackwattle Bay Marina which currently occupies what should be part of the Bank Street park and its relocation further South. I also support community uses for the site at 1-3 Bank Street, including dragon boater toilets and change rooms, affordable artist studio and exhibition space, an office for the operation of the proposed public marina, and a café/bar/restaurant.

4.0 Sustainability – The graphics accompanying the BBSSPS depict large swathes of concrete in the areas of public space. As a scientist developing new methods of manufacture of cement, I am aware that it is responsible for over 6% of global emissions, therefore should be deployed sparingly, if at all in the proposed developments. New cement formulations could be a sustainable alternative, but every effort should be made to reduce hard surfaces to enable absorption and capture of water.

It goes without saying that I support solar panel installation, together with battery storage of power generated. My company is also in collaborations involved in the production of new materials which will greatly enhance the efficiency and storage capacity of batteries to be manufactured in Australia.

I also strongly support the installation of public fast-charging EV stations throughout the Precinct, as well as their installation in private carparks.

5.0 Affordable Housing and Social Infrastructure

INSW appears to have hit on the lowest possible percentage of Affordable Housing it can get away with. 5% provision is simply ridiculous at a time when there are over 50,000 people on the waiting list for Public and Affordable Housing. At least 20% of mixed-size Public and Affordable Housing should be incorporated into the Precinct Strategy, with the responsibility for delivering it via developer contributions resting with the City of Sydney, and, on

completion, administration resting with the Department of Housing and City West Housing. The first redevelopment of the Pyrmont Peninsula saw the integration of Public and Affordable Housing with the new private apartment buildings. This has resulted in an exceptional degree of social integration, with the community coming together to help one another and to work together on a voluntary basis to raise funds for local charities.

It is also imperative that developer infrastructure contributions be levied and received by the City of Sydney to ensure that much-needed social infrastructure is delivered within the Pyrmont Peninsula. The first Pyrmont redevelopment has seen a huge increase in residential and worker population, and social infrastructure investment has not kept pace with the demand for community facilities. After more than 10 years of community lobbying, the City of Sydney is proposing to redevelop part of the Pyrmont Community Centre to provide more space for community activities. But this represents catch-up and will not meet future demands for such space.

The PPPS (p75) proposes that contributions from Key Site development (of which BB is one) could fund the proposed (by the community) Maybanke Sports and Recreation Centre on this site in the centre of Pyrmont Village. The site is well-served by public transport (unlike the BB Precinct) and its redevelopment could provide a regional facility similar to the Ian Thorpe Aquatic Centre in Ultimo. I note that there are currently no full-sized public courts in either Ultimo or Pyrmont. An indoor sports facility would enable the development of local teams, and a place to train, and compete. I don't support provision of community facilities on the Western edge of the Peninsula, but strongly support the use of BB developer contributions to help fund a centrally-located sports centre which will be easily accessed by all the new residents and workers moving to the area as foreshadowed in the PPPS.

I oppose the BBSSPS as presented, primarily on the grounds of excessive height and scale, substantial loss of views and sunlight across Pyrmont, and the development's exclusion from all the appropriate planning assessment and approval procedures which provide checks and balances against inappropriate developments such as presented in the Strategy. This project should go back to the drawing board, and this time, its revision must include genuine community involvement in the planning process. We know what works, having been through "transformation" once already, we know our Place intimately, and we know what's needed to improve the physical and social amenity of the Pyrmont Peninsula – and that is not a wall of towers along the Blackwattle Bay foreshore.

Dr Mark Sceats (PhD, FRACI, CIEAust, FTSE)

181171

Seifert

Ultimo

I hereby submit a response on behalf of Ultimo Village Voice, a community group in Ultimo

Ultimo Village Voice

Email: ultimovillagevoice@gmail.com

19 August 2021

Infrastructure NSW

By email: Blackwattle.Bay@infrastructure.nsw.gov.au

Dear Sirs

Re: Revitalising Blackwattle Bay Master Plan

Ultimo Village Voice (UVV) is a community group in Ultimo and has supported local residents, provided an avenue to gain information on important issues that impact the local area and benefits from the collective knowledge of long-term residents. Further, UVV liaises constructively with State and City representatives to drive positive community and local business outcomes. UVV has been instrumental in developing improved safety and design outcomes in many recent developments in the local area.

We welcome the opportunity to provide feedback on the plan to revitalise Blackwattle Bay. Our comments are outlined below.

Alignment with the Pyrmont Peninsula Place Strategy

It was mentioned in the original plan that the future renewal of Blackwattle Bay is "also consistent with the ten directions recently released by the NSW Department of Planning, Industry and Environment to shape the Pyrmont Peninsula Place Strategy". UVV stresses the significance of a once in 100 year's opportunity to develop the waterfront and suggests that this proposal should not proceed before the Pyrmont Peninsula Place Strategy is finalized. The alignment with the Pyrmont Peninsula Place Strategy will ensure a collaborative voice of unified planning and development in the Peninsula area.

Building Height and Form

The rezoning proposes 12 building envelopes with towers of up to 45 storeys and lower buildings of 4-8 storeys.

We point out that the proposed building heights up to 45 storeys high is more than double the height of existing apartment buildings in Pyrmont and is inappropriate for the revitalization. This would create wind tunnels and disastrous overshadowing as illustrated in the shadow diagram which clearly indicates that residences in the Wattle Crescent precinct and in Bulwara Road and Jones Street up to Fig Street in shadow for all but around 2 hours per day in midwinter.

As indicated, Ultimo and Pyrmont has its own unique characteristics with a mix of terrace houses (some of them heritage listed), converted wool stores, and more modern residential and commercial buildings, and should not be made to conform to the building heights in Haymarket, Broadway, Barrangaroo and the CBD.

The proposed upper height limit also does not align with the Pyrmont Peninsula Place Strategy, in particular Direction 2 which states “Any changes in building forms and public domain must be sympathetic to, or enhance, that character”.

Foreshore Public Space

We believe that public land, specifically water frontages, should be kept as public open space, or where necessary built in the best interests of the community and the city and do not believe that the foreshore promenade is set back enough for the anticipated amount of pedestrian and bicycle traffic.

The 10 metre wide promenade proposed is too narrow to be world class and to adequately provide for the number and range of activities of people who will use it. We propose that it should be predominately 30 metres wide with a minimum of 20 metre width in some places.

Overshadowing of Open Spaces and Buildings

This rezoning does not address overshadowing of existing dwellings south of Pyrmont Bridge Road (as illustrated in the shadow diagram), and in particular sunlight in new parks is restricted.

Education Facilities

Ultimo and Pyrmont have a newly built primary school and it is expected it will reach capacity of 800 students in 7 years. The perceived increase in high-rise dwellings will generate primary students in excess of that capacity.

The majority of Ultimo/Pyrmont public high school students attend Sydney Secondary College located on three campuses including the year 11-12 on Blackwattle Bay in Glebe. Within 7 years this campus may have to be repurposed and enlarged as a year 7-12 comprehensive high school. By that time as the 7-10 feeding campuses of the existing college (that are inconveniently located for Ultimo/Pyrmont students) in Balmain and Leichhardt will be overfull with more local students.

We are disappointed and disagree with the report that the development will not trigger demands for new schools. We strongly request that a new secondary school be planned in the Ultimo Pyrmont Peninsula to cater for the increased demand in the years to come.

Trees

Under this proposal few, if any, streets will have the sunlight required for good tree growth.

We point out that some urban heat and mental health impacts can be mitigated by biodiversity - people looking up to majestic tree canopies exploding an array of vivid greens and birds in a world class Australian city waterfront walkway on a summer's day. Trees make it cool to walk.

Social and Affordable Housing

After the failure during the original grand plan to provide adequate housing in Ultimo and Pyrmont for nurses, police, teachers, ambulance, fire, delivery and community and city support staff (and in these contagious times - cleaners), the need to provide accommodation close to where such people are employed is greater than ever.

In this, the most expensive city in the nation, these key workers require a far greater contribution. More will be required if private land must be purchased. The City West model of setting rents according to their incomes can help moderate financial support.

Developer Contributions

We also request that the developer contributions raised in Blackwattle Bay be dedicated to support infrastructure in the Pyrmont/Ultimo/Glebe/White Bay precinct.

Notably, the support for public and affordable housing is limited to 5% in this scheme. We support the recommendation from The City of Sydney for this to be increased to 25%, in order to become closer to meeting the need while we still have some government owned land available on which to build these homes.

In Conclusion

We reiterate our views that:

- revitalizing to align with the Pyrmont Peninsula Place Strategy
- we reject the over-sized building heights up to 45 storeys high and the bulkiness should be reduced
- foreshore public promenade needs to be wider
- a new secondary school is desperately need for the Ultimo Pyrmont Peninsula
- a biodiversity plan to ensure adequate sunlight for existing trees and more trees to provide a more pleasant environment
- developer contributions be specifically dedicated to support infrastructure in the Ultimo Pyrmont area, in particular allocation for affordable housing to be increased

UVV would appreciate favorable consideration of our feedback above and look forward to engaging in community consultations in the development of Blackwattle Bay.

Regards

Yimmy Seifert

Chair, Ultimo Village Voice

Ultimo Village Voice (UVV) was established in 2004 and is the official successor organization to the Ultimo Precinct Committee sanctioned by the City of Sydney and relied on by the Lord Mayor to provide resident feedback, advice and guidance to many matters related to aspects of the maintenance, development and administration of Ultimo. We meet a number of times per year with the Lord Mayor, Council Members and City Officers to that end.

UVV generally meets at 6:30 pm on the first Thursday of the month (February to December) at the Ultimo Community Centre (40 William Henry St, Ultimo, entrance from Bulwara Road). Currently the meetings are virtual meetings.

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Sharp

GLEBE 2037

As attached

Traffic congestion and parking

- Pyrmont Bridge Rd (PBR) is a major route for traffic from the west heading to the casino, convention centre and other Darling harbour attractions. It also carries a heavy flow of traffic westwards from the city via the Western Distributor and the south via Wattle St. A new set of traffic lights at the intersection of PBR and Wentworth Park Rd will not mitigate the congestion.

- Despite lip service paid to public transport services apart from the new Metro station at Pyrmont these are not specified. The issue with the new Metro is that it is located too far from the development and most residents do not like to walk anywhere that takes longer than 5 minutes. The ferry service is not guaranteed and is always described as planned but in the hands of the Transport Dept; this means that it is unlikely to proceed. .Even if there were to be an introduction of new services, most people will still prefer to drive. Sydney residents typically shun public transport as it is not as convenient as driving. These factors will severely impact the amenity of the local residents.

- No consideration has been given to the additional traffic that will be generated by the large number of residents that will occupy apartments to be built on the existing FM site. This is a critical flaw and the failure to consider the additional impact of this over scale residential development will invalidate the conclusions arising from the traffic modelling used to support the development applications.

Public access to the foreshore path

- This is the long awaited opportunity to complete the ‘missing link’ of a foreshore path from Annandale to Woolloomooloo. There should be unrestricted 24 hour public access to this path. The path should not be limited to the narrow width that is planned. The width is compromised due to the inadequate set back of retail premises on the foreshore. These should be moved back to allow the public space room to breathe.

- More useable green space needs to be allocated. The new green space to the north of the site near Bank St is in perpetual shadow under the Anzac Bridge and is therefore not fit for purpose.

Environment

- The 45 storey towers are massively over scale and will overshadow the solar panel panels that will provide for 100% of the NFM’s electricity demand. This is unreasonable given the proposed shade-free orientation of the NFM.

177281

Shaw

PYRMONT

I am happy for my submission to be made public but I request that my contact details be removed.

SUBMISSION ON STATE SIGNIFICANT PRECINCT – BLACKWATTLE BAY

GLOBAL COMMENTS

1. Greater Sydney Commission and Planning Excellence

In one of the documents that I read when reviewing the *Blackwattle Bay State Significant Precinct Study* I noted the concerns that the Greater Sydney Commission's concerns about the complexity of planning in the Blackwattle Bay area.

No-one can deny the amount of planning studies that the Pyrmont Peninsula has been subjected to. Unfortunately, I cannot believe that this most recent study would assuage the Commission's concerns. This study is perhaps the most repetitious, poorly-structured/written and hard to read document that I have had the displeasure of reading. Rather than a true planning study it is more of list of acronyms, tables and references to other studies and planning documents and what they require rather than advancing planning for the site and Pyrmont Peninsula and garnering support.

It also occurs to me that the report was developed to accord with the principles of the Yes Minister/Prime Minister TV series:

1. Get Rid of the Problem in the Title
   - this Study is not about Blackwattle Bay but less than 50% of it
     : only the portion you WANT to include in the Study

2. Is it the right weight? The report is
   - poorly structured, the report hides important comment deep in the document;
   - unbelievably repetitive and more a list of requirements from other documents and statements about "that" it responds rather than actually responding;
   - filled with numerous figures missing codes and which should have been amalgamated
   - missing all the documents frequently referred to as attachments, the contents of which should have been discussed properly in the report.

Having struggled through the report I am left with the impression that the report is intended to bore and confuse the reader so as to limit legitimate and reasoned response.

The number of times that the document refers to the need for future studies and decisions clearly makes it an inadequate report on which to move forward.

The report also repeatedly refers to the need for planning excellence. I have difficulty in accepting that this report represents "excellence" in any form>. Just saying the words does not make it so.

2. The Precinct and Place-Based Planning

All sites or precincts exist within something of a higher order. As I commented in my submission on the new Sydney Fishmarket, that study sought to avoid significant issues by limiting the extent of the geographic space under consideration and sidelining the impact of that area on the surrounding. While this study report refers to the surrounding areas its treatment of them is inadequate and seems to adopt a "not our responsibility" and "somebody will look at that later" approach. How can that be planning excellence if a site is planned before its impacts on the surrounding area is known. For example, it takes 148 pages to acknowledge that further study of utilities such as water, sewerage, electricity, and gas in the Pyrmont Peninsula is required and 154 pages to acknowledge that a Pyrmont Infrastructure Study is required yet seeks to develop the Blackwattle Bay Precinct as narrowly defined in advance. It is unsurprising that the Pyrmont community is not supportive and lacks confidence.

Rather, the Blackwattle Bay study, is myopic and essentially deals with the old Fishmarket site and the Bank Street foreshore – although that part of the site is primarily dependant on "future" decisions. Is this really good enough for s site of such significance and reflective of panning excellence?

My other general comments on the site are that it:

- ***Fails to address the gateway to the Bay – Glebe Island Bridge.*** This heritage item is too important to be largely ignored in a plan for Blackwattle Bay. Surely it cannot be planning excellence to deliberately ignore/defer this important but decaying heritage item to future decisions. Then, suddenly at p 134 there is an alarming statement slipped in that talks about "construction of a "new crossing" between Glebe Island and Pyrmont that "could support walking cycling and public transport". What does this mean for the existing and much-loved Glebe Island Bridge and if this structure or a new one is recommended it would totally change the need to funnel cycling and public transport through Pyrmont as the harbour foreshore would be a far more logical and acceptable route. This needs to be decided before the Blackwattle Bay infrastructure is constructed.

- Fails to properly deal with the roads and traffic issues that border the site. Decisions on major roads bounding the site need to be agreed before planning for the site is finalised.

- Fails to deal adequately deal with utilities infrastructure (water, sewerage, gas, and electricity capacities) are properly assessed and, where necessary upgraded. Having only recently recovered from the disruption caused by the Darling Harbour redevelopment, residents of Pyrmont are rightfully concerned about future severe disruption while not only building works at Blackwattle Bay are undertaken but also a major upgrade of water and sewerage from the southern end of the Peninsula are upgraded/replaced.

- Treats surrounding areas of Pyrmont, Ultimo and Glebe differently with Pyrmont being the big loser when it comes to issues such and noise and solar impacts and the impacts being hidden and only fleetingly discussed in the latter parts of Study.

- Conflicts with previous studies such as the Pyrmont Peninsula and transport studies (the latter talking about closing and narrowing roads in Pyrmont and this study speaking about opening and widening them.

- Defines out the western foreshore of the Bay just as it does the bordering roads. I note the consultation with the Sydney College (owned and controlled by the State Government but if I was a resident of Glebe, I would fear that "Glebe is next".

- Caves-in the commercial interests to the north of the current Fishmarket site including, but especially the Hymix site which is simply not congruent with the aims of the Study. Anyone who currently lives in the Miller Street area would be aware just how much concrete dust this facility spreads over the neighbouring areas. Its 24-hour operation also creates a lot of noise from trucks at night as well as its trucks being one of the major transport problems in the locality. Just because Hymix say its facility is essential does not mean it is so – it probably isn't. It must go before the old Fishmarket site is redeveloped. Even the study indicates the problems it will create for the site let alone the surrounding areas.

  All "private land-used, if advised now should have plenty of time to relocate before the mid 2020s and the sites then compulsorily resumed as they are inconsistent with not only the site but surrounding residential areas.

3. The World has Changed Irrevocably – Catch Up!

While I note the numerous planning studied that have been conducted in the past and their predictions of housing, commercial space, and employment needs, are used, COVID has rendered these studies out of date.

Working from home is now a fact of life and it is highly unlikely former "office-based" will return. Work will return to anything like previous levels. Health Directions also inhibit the number of workers who can occupy any space and the demand for apartment living weakened. We will not be going back to previous models and your demands should be revised to reflect this and recognise the excess of space that now exists in the CBD. There are already

predictions of a glut of office space in the CBD and retail shops there are in desperate need of additional city workers. Building office space in Blackwattle Bay will only exacerbate that problem and should be reconsidered. It is highly likely that a lot of the "Innovation Corridor" requirements can be satisfied without Blackwattle Bay.

Similarly, apartment and inner-city living has lost a lot of its attraction as working from both home and moving to regional areas has been both feasible and desirable. Your arguments about "affordable housing are also badly diminished by your acknowledgement that only 1.7% of the residential floorspace on the site will be for that purpose (as opposed to 5-10% across Greater Sydney), your failure to identify where that will be and your arguments that it should not be mixed with medium and high-end housing. Essentially, therefore you are proposing a waterfront development for the rich.

4. Impact on Pyrmont

Throughout your report you downplay the impact of your proposals on the existing community of Pyrmont. Glebe and Ultimo feature far more prominently in your report than does Pyrmont and your proposals frequently conflict with previous studies. Ultimately, buried deep in the document, you admit that further work is required to properly understand the impact of the proposals on Pyrmont – a clear indication that the site area is considered mor important that the remainder of the suburb.

Pyrmont residents are not proposed to development but it needs to be appropriate development. We know that the Star tower proposal is not dead and fear being squeezed into a sunless valley with the Star blocking our morning sun and Blackwattle Bay our afternoon sun. Leaving development approvals in the control of a Minister or a Departmental Secretary simply adds to that concern and mistrust.

5. Attachments

The Study refers to 41 Attachments stating that information can be found in them – it isn't provided in the document under review.

However, the Attachments are not provided nor at there links to them? Why is that?

DETAILED COMMENTS ON THE STUDY/REPORT's CONTENTS

Page	Issue	Comment
xi - xiii	Increase international visitor length of stay and expenditure	Wording reveals the truth about the proposed development as an adjunct to The Star and an as a "cash-cow for the NSW Government
xiv	Precinct Plan - comprehensive urban design visions and strategy	This is highly debatable. A comprehensive Plan would properly cover all of Blackwattle Bay not just select parts and even the Study show much planning is yet to be undertaken.
xv	Extension of Miller Street	The Study exhorts the through site roads and lanes but ignores the reality of the problems that the current Fishmarket creates for Miller and adjacent street. The plans for the street and laneways will add problems for surrounding areas Pyrmont not improve the problems there. You even admit that the transport modal mix that you are espousing is aspirational and will be difficult to achieve. Referring to extending Miller Street Saunders Street as providing vistas is also grandiose.
xiv	Glebe Island Bridge	Based on the report the old Glebe Island Bridge is THE MOST SIGNIFICANT heritage item (European or First Nations) in the vicinity. I cannot believe that a planning body claiming "planning excellence" in place-based planning could leave the gateway to Blackwattle Bay out of the Study. The Study is monotonous about the much trumpeted "world class Fishmarket that will be erected at the head of the Bay. Yest the Study cannot

		even bring itself to admit that the Glebe Island Bridge, the most important and much-loved heritage feature in the Pyrmont landscape actually exists. and lies rotting. It is not only "planned out" of the Blackwattle Study, it is referred to in Figure ES2 as "Future Connection to Glebe Island". WHAT! How can a planning authority that touts itself as delivering planning excellence leave a small sliver between 1-3 Bank Street and Evolve as unresolved in this Study? Sham eon you! Then, buried incredibly deep in the Study at Page 135 the Study states *The construction of a new crossing between Glebe Island and Pyrmont could support new walking, cycling and public transport links.* This is extremely worrying to Pyrmont residents concerned about our heritage and would lead us to believe that the existing bridge is going to be left to rot until cannot be salvaged and is replaced by a new structure. This cannot be allowed to happen. Further, as hinted at in the report a Glebe Island connection could allow a huge volume of pedestrian and cycle movements (but perhaps not public transport) to be diverted out of residential Pyrmont and onto the harbour foreshore. This matter should be resolved before development of Blackwattle Bay is commenced and cannot wait for planning of Glebe Island to be undertaken and agreed.
Xvi	138,000 sqm of space for employment.	For the reasons mentioned above, I believe this is now excessive and should be downsized significantly.
Xvii	16 Principles	I would contend that the Study fails against Principles 5,6,11, 13 and 16 and, as such fails the test of design excellence.
9	Precinct Plan	The Study states *the current planning framework applying to Blackwattle Bay is complex, with controls contained within several different planning instruments. This is inconsistent with planning best practice and will not facilitate the realisation of the vision for a renewed Blackwattle Bay.* *The Blackwattle Bay SSP Study outcomes will establish a new planning framework to guide the future* *land uses, design and development of buildings and public domain in the Precinct.* That may be the authors' view. Put simply I do not accept it. For reasons I have explained above and below I believe that the Plan is inadequate and not a sufficient basis on which to proceed.
9	9 Project Objectives	To my mind the Study fails Objectives 4, 5 and 6.
9	A2.4 Project Governance	I am opposed to the proposed Governance model which completely lacks local representation. It needs to be broadened to obtain community input because State Government agencies clearly do not understand/accept Pyrmont community views.
10	Study Key Principles	This is the clearest example (as if one was needed) that there is no interest in the existing residents and businesses (except perhaps The Star) of Pyrmont. Please remember that the future of casinos in Australia and Sydney and Melbourne in particular are now under a serious cloud.
21	Privately Owned Lands	Does Hymix ACTUALLY own their site??? I recall being horrified some years ago at seeing media that their "lease" had been extended by 50 years. Either way:

		1. I would question that any site that relies all raw materials to be trucked in is essential (maybe the output is but it could be delivered from elsewhere just as when the Hanson's facility on the new Fishmarket site has been 2. The report clearly indicates that the facility is inconsistent with the proposed development but fails to acknowledge both the adverse noise and cement dust problems that the site creates for surrounding areas of Pyrmont. 3. Of course Hymix will argue that the site is essential but that does not make it true. If Hymix were given its marching orders now they would be able to relocate before the new Fishmarket is opened. For similar reasons, I cannot see why other privately-owned lands facilities could not be successfully relocated with three years notice.
23	B3.6 Other Uses	This discussion is not consistent with latter information which describes 1-3 Bank Street as a local heritage item. There is also no clear indication of what is proposed for the "new temporary 5-year maritime facility" and the Dragon Boats storage. Relocation of the dragon Boats is never discussed.
27	Gradients	*The gradients along some footpaths on routes towards public transport stops and major transport hubs (Town Hall and Central stations) are steep.* Are you serious? Have you even walked them?
28	Light Rail	Figure 11 – are you not aware of the John Street Light Rail stop or do you just not want to admit to its existence?
29	Parking	This is a clear example of the authors' myopic approach to planning. The statements are ignorant in that they deal only with "on-site" parking and ignore the "off-site" parking volumes and issues created by the infestation of small buses from The Star and the Western Suburbs that are not catered for in either the old or new Fishmarkets. Drivers have, in the past told us that the Council allows them to park contrary to street signs. We have observed Council Rangers walk past/ignore illegally parked vehicles in the past and have no confidence that this will not occur in the future.
30	Heritage	*"There are no heritage items of local significance in the Blackwattle Bay Study Area".* Clearly defining out the Glebe Island Bridge and the assists this argument as does the Kauri Foreshores Hotel that support my arguments about the site definition. However, the Study a lot later mentions the local heritage importance of the buildings on 1-3 Bank Street – so much for planning excellence. Also excluded seem to be the two on-site parcels of Aboriginal peoples' heritage and the in-cliff cave shelter at Jacksons Landing.
37	5 Big Moves	It could be reasonably argued that Pyrmont residents are not interested/in favour of Big Moves 2 and 3. Neither of which have benefit to us. It is also of interest that none of the 5 Big Moves mention housing or work – two of the big principles allegedly underpinning the study.
54	Minister may waive requirement for a master plan	If the Blackwattle Bay site is as significant as claimed, how can it be argued that development of a Master Plan is unwarranted. Doing this is tantamount to stifling legitimate and important debate and should be strongly criticised.
55	SLEP Heights	Figure 24 is intentionally confusing in that the heights indicated do not indicate whether they are metres of floors.
62-64	Reconnecting The Bay To Its Surrounds	The naming of the street and lanes (eg Gipps) is not explained as to its connection with Pyrmont.

		Further, the extension of streets such as Miller and Saunders seem to have far more to with movement through the site than connecting the neighbouring areas of Pyrmont. In fact, connecting Miller and Saunders Streets to the foreshore are likely to increase difficulties for the residents of those streets. The recently installed cycleway in Miller Street is a failure (most cyclists use the newly narrowed roadway instead of the cycleway) and hated by many residents because of the problems it has created.
64	Community Consultation	As evidence by the statements in the Study, the community consultation has not been with residents but with bodies that might be expected to support development proposals – it is "fake" consultation
71	Hymix	I view the comments here as an ambit defensive position by Hymix that could not be reasonably sustained. The Hanson's plant was removed for the new Fishmarket and despite pressure by Hanson's it was not relocated to Glebe Island. Pressure by Hymix to remain should be similarly refuted.
73	Building Heights	While many people may have opted for Scenario 2 that does not mean that we like it. It is akin to being asked how you want to be executed – being electrocuted, being hot or having your head removed. None of the three scenarios are acceptable to most Pyrmont residents that I have spoken to who all believe that the heights of the buildings are excessive and that they will result in significant afternoon shadowing for significant parts of Pyrmont village. The study deals with avoiding morning shadowing of Glebe and Wentworth Park but remains silent when it comes to Pyrmont. If ever The Star Tower is built, we could be in shadow in both the morning and afternoon especially in winter.
75	First Nations Culture	Is this it? Is this all you could come up with despite First Nations supposedly being a significant component of your philosophy?
81	Roads	The current Gipps Street Pyrmont terminates on the Eastern side of Harris Street Pyrmont and there appears no intention to extend it to the current Fishmarket site. Why then are streets in project area being called Gipps Street and Gipps Street and Gipps Lane – just as the bisected Jones Street does. Also why is the nomenclature European and not based on Aboriginal words? I also strongly oppose any road system on the site than promotes vehicles from the site moving through or seeking parking in the residential streets of the remainder of Pyrmont.
85	Proposed Road Hierarchy	Figure 33 shows Miller Street as a 'Major Road". This is both unreasonable and unacceptable to Miller Street residents. Our street has always been a busy and heavily used road and is often a bottleneck in the weekday afternoon. The recent addition of the cycleway has reduced its carrying capacity and increased the danger for accidents between bicycle and vehicular traffic. It does not have the capacity to carry additional traffic generated by the proposed Blackwattle Bay development. Through traffic should instead be funnelled onto the largely not residential Pyrmont Bridge Road.
86	Development sensitive to adjacent development.	This is not correct. Your report concentrates on open space and sun planes for Glebe Foreshore, Sydney Secondary College and Wentworth Park. It totally ignores afternoon sun planes for Pyrmont Village which will be completely overshadowed in the afternoon. This is unacceptable. For the study to justify building heights on mirroring those on Distillery Hill is also laughable. Those building are constructed on a far higher elevation, and far less floor and create far less afternoon shadowing than will those proposed for Blackwattle Bay.

		As well as shadowing the existing residential areas of Pyrmont Village the proposed building will also cause a loss of both views and privacy for existing dwellings. Yet again I must object to the myopic views expressed in the report about the need for appropriate sun-planes on site but total disregard for the sun-planes of Pyrmont Village.
88	138,000sqm employment floor space	As stated elsewhere, I do not accept that this minimum can be justified in the posit COVID environment especially when there is so much concern for excess floor space in the nearby CBD.
93	Maximum Building Heights	*The proposed maximum heights will ensure that appropriate solar access protection is afforded to existing and new open spaces.* This is another clear example of how myopic the authors are. Your concern is for the site and totally ignore the impact of your proposals on Pyrmont Village. How can this possibly be "planning excellence"?
94	Affordable Housing	Your admission that only 1.7% of residential space in the development will be for affordable housing compared with 5-10% across Greater Sydney makes a mockery of the other statements in the Study proudly espousing a mix of housing types. This is further evidenced by the fact that you argue for sperate buildings for affordable housing but do not indicate where that will be. No doubt you are intending that they be around the Western Distributor that you have already stated will suffer noise issues.
110-112		DCP 2012 requirements and the shadowing overlay map on p 111 clearly demonstrate the callous disregard that this Study shows for Pyrmont and its residents. The study constantly looks West and never East unless it is to solve an on-site problem.
119-120	Indicative Staging Plan	This Plan is extremely disappointing and will compromise the success of any development on the Fishmarket site for many years. It is a sell-out to commercial interests and clearly indicates that the Study is all about getting maximum economic benefit out of the current Fishmarket site and that anything else is peripheral and of little, no interest.
122	Promenade Width	Again, choice of Option 3 promenade width demonstrates: 1.the desire to squeeze as much money as possible out of the site and forsaking public open space for extra building space. 2. Caving into the commercial interests in Development Zone 8
125	Figure 55	Ignores the Light Rail stop at John Street Square which would be an important access link for the northern p[at of the site.
126	Glebe Island Bridge	The statements at p126 are cursory and do not satisfy the requirement of SR3.6 to identify "how" the plan connects to the former Glebe Island Bridge as a possible future active transport connection to the Bays. Planning access to and through the site and ignore the significant opportunities offered by a future transport link that could significantly alter the situation cannot be "planning excellence".
133	SR4.13 Noise & Acoustic Compatibility	Your Study shows that the Hymix facility is not compatible with the proposed land uses – even ignoring the dust that Hymix creates yet the building planning studies show that proposed buildings are intended to be constructed so as to minimise the problem. Surely this is not acceptable. The Hymix site is a problem already for existing local residents from noise, dust and transport perspectives and will become even more of an issue when the current Fishmarket site is redeveloped. Hymix's assertions that the facility is essential need to be seriously tested. I do not believe them. Hanson's relocated to allow the new Fishmarket and construction in Sydney survived. The same would happen if the Hymix facility was forced elsewhere.

168076

Shepherd

Ultimo/Sydney NSW2007

Rachel Shepherd

21 Hackett Street

Ultimo

NSW 2007

27th of July 2021

Submission Regarding Plans for Black Wattle Bay

Dear Sir/Madam

I am writing to you to object to the current version of the plan of for Blackwattle Bay. I am not in principle opposed but this is a very, very bad plan.

The chief problem is that the roads in the immediate area (Pyrmont Bridge Road, Wattle Street feeder roads toward the city and Anzac Bridge are already at or exceeding capacity at rush hour. I know, I crawl in my car every morning as I take my child to school. It is not uncommon for Wattle Street to be backed up all the way to William Henry Street.

It has been argued that the residents will not have cars as the public transport will be so good. For this reason the buildings will also not have parking. This is a colossal miscalculation. Happily we have an extremely similar development with even better public transport just around the corner in Pyrmont.

Blackwattle Bay is proposed to have 1,550 residences. Using Pyrmont as a model, we know that 70% of households (2016 census) have at least one car registered in Pyrmont, some had 3. They may mostly walk to walk but they drive to the shops and elsewhere. That is conservatively 1,085 car that will need parking (0.7x1550) at Blackwattle Bay, or spill over to surrounding streets. There are no plans to change the local roads, it is probably not even possible as the area is already heavily built up. There is no way there is capacity for an extra 1,085 car, even if less than 10% try to leave in the morning.

https://www.planning.nsw.gov.au/-/media/Files/DPE/Strategy-documents/Plans-for-your-area/Planning-for-local-communities/Pyrmont-Peninsula/Demographic-Profile-2020-12-09.pdf?la=en

In addition each Pyrmont household had 1-2 children under 17, 9% of the population, an increase since 2011. The 1,550 households will need conservatively 1,550 additional school places. The City of Sydney would have to build at least 1 more school, maybe two, just to serve Blackwattle Bay. It makes sense that this school should be built on the Blackwattle Bay site to reduce unnecessary commuting. Along with a supermarket as the Pyrmont one is too small.

Another problem is the tourist coaches. Prior to the pandemic I have seen at least 3 coaches of tourists arrive at the fish markets together and swarm the site. I imagine that the larger new Fish Markets will have even more coach arrivals. It was apparent to me at the transport public webinar that there was no plan in place for all these coaches (I asked). Where are they supposed to park as the tourists visit the market? Are they expected to park illegally on Pyrmont Bridge Road (as was suggested) or sneak up the residential side streets? Part of the site footprint needs to be set aside for tourist coach parking and transportation trucks so problems are not exported to the surrounding areas.

The main external staircase at the front of the new Fishmarkets building blocks the flow of pedestrians along the waterfront. People are forced inside and possibly upstairs. If the staircase width is reduced to half people can walk unimpeded around the building.

Finally, I can see no plans that affordable options are built into the site. The Fishmarkets is in danger of being a site that only tourists and the wealthy can afford to use. Like the Tramsheds and a lot of Darling Harbour, residents are being priced out of their own local shops. Please include affordable options where you can get a bottle of water, snack and an icecream without having to budget for it or take out a loan.

Best Wishes

Rachel

Rachel Shepherd

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Ultimo

NSW 2007

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the tourists visit the market? Are they expected to park illegally on Pyrmont Bridge Road (as was suggested) or sneak up the residential side streets? **Part of the site footprint needs to be set aside for tourist coach parking and transportation trucks** so problems are not exported to the surrounding areas.

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Best Wishes

Rachel

167866

Sim

Croydon NSW 2132

Please see attached submission.

Thank you.

Ronald Sim

Dear Sir or Madam

A. Blackwattle Bay Proposals - SIMPLAN - Submission

Thank you for the opportunity to comment on the proposals.

My concern is that the proposed very tall towers, although positioned to the rear of lower buildings located closer to the waterfront, may be “characterless” glass boxes (irrespective of “design excellence” objectives which in reality are rarely realised) and similar to towers erected in any city in the world, rather than in a city with the character, style and sophistication of Sydney. Towers with windy voids between, although visible from a great distance, offer little in terms of creating a “pedestrian friendly” human scale. In fact, it is somewhat depressing that the Department continues to promote a simplistic “Tower Block” built form typology as promoted by developer lobby groups both here and in many other parts of Sydney.

It is possible as an alternative to achieve very high densities with continuous, highly articulated 6-8 storey perimeter block structures with zero building setbacks. European cities have many fine examples of this built form which demonstrate a more human “pedestrian friendly” environment and implement a superior urban design outcome in comparison with bland “tower options” currently proposed. Perhaps the substantially lower forms of development as depicted along the foreshore can be extended to replace tall tower structures.

If the proposed towers are ultimately approved despite numerous objections (an outcome anticipated given the Department’s past lack of meaningful responses to submissions) it is essential that sufficient design care is applied to the critical lower 20 metres of all towers where they increasingly interface with the pedestrian environment and so require a higher design standard viewed “at eye level”. Towers and associated podium designs potentially blighted by excessive building services at ground level and/or continuous monotonous facades without sufficient built form articulation or meaningful depth should be rejected by the determining authority.

Active street frontages to the proposed lower rise buildings along the foreshores should be mandatory for *all* structures, including tower buildings, and be well articulated to create “light and shade” on elevations. Under no circumstances should towers be positioned directly adjacent to the waterfront. A carefully selected palette of quality materials and colours appropriate for an important foreshore location such as this must be specified “upfront”.

I hope the above comments constructively assist Departmental “thought processes” concerning the exhibited proposals and similar future “tower oriented” schemes.

B. Departmental Reform Program- SIMPLAN - Comments

P.S. Although an unrelated separate matter (so please forward to the appropriate team) I would like to express my concerns about the Department’s current “reform” program – more specifically -

(a) Proposals to expand complying development for substantial developments (e.g. possibly applicable to 5 storey developments in business zones which adjoin residential properties). A “tick the box” approach with scant consideration of urban design matters and with approvals potentially issued by Certifiers who may have little town planning or architectural expertise is not

appropriate for developments which have considerable environmental impact. These types of developments require a thorough, professional assessment.

(b) Providing an appeal process to the LEC for Planning Proposals. My comment based on past observations is that the Court may not have the requisite professional expertise to determine complex strategic planning matters and can adopt an overly legalistic approach, contributing to undesirable outcomes which have significant environmental impacts for the local community.

I hope the above comments are viewed as both helpful and constructive.

Kind regards

Ron Sim

SIMPLAN Planning Consultants

ronsim84@gmail.com

Mob 0403 448 155

182926

Smith

Annandale

Please see attached

Blackwattle Bay Redevelopment

Having reviewed the information provided for the Blackwattle Bay redevelopment, I am strongly opposed to the current proposal as detailed as follows:

- Open space – this is totally inadequate given the size of development and the significant overshadowing by development so will be mostly unusable. This outcome reflects very poor urban design.
- The public open space for walking is minimal at some points
- The scale and bulk of the development proposed – up to some 45 storeys will have significant adverse impact on both the local area, as well as skyline views from most directions.
- There will be significant overshadowing in the current form, of public open space including across the bay itself.
- A key feature of the area (Anzac Bridge) and the city skyline that will be overshadowed/ significantly change as a result of the proposed height by the proposed development which significantly detracts from this iconic view.
- There has been insufficient consideration given to the protection of the natural harbour.

Any new development in this area needs to be is sensitive and enhance the character of the area. The current proposal detracts from the urban environment, is not sensitive, and in no way enhances the character of the area and as such, should not progress for further review.

Greg Smith

Annandale

166671

Smith

Pyrmont 2009

To whom it may concern,

The photo's attached highlight how concerned my wife and I are with the proposal for Blackwattle Bay. The first photo is a shot back to the Darlington Towers from Glebe. We are in the middle tower and the middle apartment at the top of the building with an unenclosed balcony. The 2nd photo is from our balcony back across Blackwattle Bay with the current roof of the fish market visible past the on ramp deck onto the Anzac bridge.

I read somewhere that described the new development as a wall of buildings and it's clear that it will be. I envisage that all the owners in the Darlington, Wattle St, the Mill and the Goldsborough will lose virtually all views of the bay to allow the rich in the multi million dollar apartments that will stand in front of them to have the view of the bay to themselves.

Firstly I do agree that the current fish market is an eyesore and I do like the design of the proposed model. I support its repositioning to the head of the bay and only hope that the existing road can cope with the new facility. I am fearful that some of Wentworth Park will be hived off to widen the road. Wentworth Park belongs to the local residents and should not be touched in anyway.

I further support the redevelopment of the fish market site to a reasonable level. What is proposed is manifestly excessive. I note that the tower height is 36m higher than the Anzac bridge. I have no issue with this as long as these buildings are sleek and thinner so there is an opportunity for us poorer people to have a glimpse of the water. I also think these taller towers should be spread along the foreshore rather than be largely located at the current fishmarket end. I would like to see gaps in these buildings with public spaces rather than every public space being on the promenade.

Another proposal I agree with is affordable housing however I think this should be 10% and these residences not all being at the lower end of the buildings facing east.

My concerns about the massive overdevelopment of the site are:

â€¢ The amount of further traffic with 1500+ apartments. It's a nightmare getting out of Bulwara Rd now.

â€¢ Devaluing of those apartments who will have their views largely blocked.

â€¢ The loss of sunlight with these enormous towers in front of our buildings.

â€¢ The impact of traffic noise from the Anzac bridge with the new buildings preventing the dispersement of noise.

â€¢ The further deterioation of Blackwattle Bay enviromentally with further rubbish ending up in the bay.

â€¢ The selloff of more public land and the commercial in confidence arrangements that allow developer mates of the government to make massive profits at the expense of the taxpayers.

â€¢ Insufficient public transport to cater for the site however I do like the idea of a ferry stop and of course the metro will be built at some point.

Initial discussions within our strata plan is to engage with residents of the Goldsborough, Parkview, and the Mill to seek combined legal representation to ensure that our concerns are taken into account and seek advice on remedies for the devaluation of our properties. Unfortunately given the backflips by this state government(Greyhounds, Powerhouse) and the lies(relocation of Ultimo Public School) there is very little trust that this is nothing more than odious attempt to funnel money to their developer friends.

Thank you for the opportunity to comment.

Cheers

Ashley Smith

SYDNEY FISH MARKET

182041

Sorrentino

PYRMONT 2009

Please see the attached submission from City West Housing.

20 August 2021

Department of Planning, Industry and Environment

Submitted via NSW Government Planning Portal:
https://www.planningportal.nsw.gov.au/blackwattlebay

To whom it may concern,

BLACKWATTLE BAY STATE SIGNIFICANT PRECINCT (SSP) STUDY SUBMISSION

1. INTRODUCTION

City West Housing (CWH) welcomes the opportunity to comment on the *Blackwattle Bay SSP Study and proposed planning controls* published by the Department of Planning, Industry and Environment (DPIE) on 2 July 2021. The SSP Study Area includes multiple land parcels covering 10.4 hectares. The majority of the land is government owned while there are also several privately owned lots that benefit from this study.

This submission includes a brief overview of CWH's history and operations to provide context for the submission's comments. CWH's long-standing experience in developing and managing cost-effective and high-quality affordable housing in the local area have informed our comments and recommendations.

2. ABOUT CITY WEST HOUSING

In 1994, the NSW Government established CWH as an independent not-for-profit affordable housing provider. The initial focus was on delivering affordable rental housing as part of a mixed residential community in the Ultimo/Pyrmont area for people on very low to moderate incomes while the area was undergoing a renewal that had the potential to displace existing affordable housing. As a result of its initial success, the program has since been expanded to Green Square and the Southern Employment Lands.

Today, CWH is a Tier 1, registered, award-winning community housing provider (CHP) which has successfully partnered with all levels of government to realise its vision of "building stronger communities and improving people's lives through the provision of affordable housing". CWH has had a significant role in the redevelopment of the Pyrmont peninsula and is now the largest owner of affordable rental housing in the area.

The City of Sydney has identified City West Housing as the only recommended provider of Affordable Housing in the LGA. CWH has long had its office in Pyrmont, and with the expansion of our portfolio we have relocated to larger office premises opposite the current fish market.

CWH develops, owns and manages affordable housing for the long term. Our ongoing investment in the areas in which we operate, and the support we provide to our residents across a range of income groups to help them access the benefits of living close to jobs, support networks, and other amenities, helps us contribute to inclusive communities and the functioning of our city.

In 2020, CWH completed its latest two developments in the City of Sydney LGA – in Glebe and Forest Lodge (pictured below) – which have brought the number of affordable rental apartments we own and manage to 894 and the number of residents we house to 1,635 across our current portfolio.

Over the next five years, our project development pipeline will see us deliver more than 500 affordable rental apartments, housing some 1,000 new residents within Sydney.

Blackwattle in Glebe (99 apartments)

Ironbark in Harold Park, Forest Lodge (75 apartments)

3. COMMENTS & RECOMMENDATIONS

We have focussed our comments and recommendations on the sections that are particularly relevant to affordable housing.

BUILDABILITY OF DESIGN

CWH acknowledges that the concept design is in its early stages, but we are concerned that the buildability of the massing has not been tested. Specifically, Section F3.2 of the SSP Study states:

"The maximum GFA for each block within the Blackwattle Bay Precinct has been informed by detailed urban design including site-specific testing of building mass and floor space capacity for each site. The detailed testing and ultimate GFA calculation have taken into account numerous key factors including site context, massing, building separation and setbacks, overshadowing, wind and impacts on the public domain."

The study does not reference analysis of:

- Compliance with Apartment Design Guide in regards to solar, ventilation and acoustic requirements for the residential dwellings, or
- Confirmation that if the existing AHRSEPP was to be utilised that the maximum heights could include all of the density bonus, noting that the AHRSEPP does not allow for increased height, only increased density.

CITY OF SYDNEY AFFORDABLE HOUSING PROGRAM

The City of Sydney Affordable Housing Program (AH Program) was adopted by Council on 24 August 2020 and came into effect on 1 July 2021. According to the City *"The City West Affordable Housing program will continue to apply to Pyrmont and Ultimo from 1 July 2021 and is **supplemented** by the City of Sydney affordable housing program" (emphasis added).*

The AH Program includes a mechanism to calculate an Affordable Housing contribution for land subject to a Planning Proposal (a change of planning controls on a site to increase development capacity). All new residential floor area is subject to this contribution.

Per the AH Program *"This gives effect to the intent of the District Plan to provide affordable housing where there is an increase in development capacity on land, where need for affordable housing is identified and where development viability can be maintained."* The Study Area is located in the West Precinct, which has an Affordable Housing contribution rate of 12% applied to new floor area.

The AH Program states:

"*The contribution rates have been established in line with the City's longstanding practice of directing 50 percent of the land value increase resulting from a change to the planning controls to a public benefit purpose.*

The contribution rate that is applied to Planning Proposal land is to direct 50 percent of the land value increase resulting from the changes made to planning controls towards affordable housing. It applies only to the new development potential created by the planning proposal. It does not replace any pre-existing contribution requirement.

Therefore, where land is listed as Planning Proposal land in an LEP the two separate contribution requirements will be applied to the development consent, including any affordable housing contribution requirement on the floor area that is in existence prior to the change to the planning controls".

The impact of this is that both the City West Affordable Housing Program and the AH Program apply to the Study Area. (Note the City West Affordable Housing Program is also known as the Sydney Regional Environmental Plan No 26 – City West (SREP 26)).

It is noted that the Housing Diversity and Affordability Study by Hill PDA as part of the SSP was issued in May 2021 and refers to the AH Program and concluded that the relevant affordable housing program in the Ultimo-Pyrmont area is only the Revised City West Affordable Housing Program. This incorrect assumption impacts the contribution value as discussed below.

QUANTUM OF THE AFFORDABLE HOUSING CONTRIBUTION

The SSP recommends an Affordable Housing requirement equivalent to 5% of the total residential gross floor area (GFA). This is the minimum of the target range as described by the Greater Sydney Commission Eastern District Plan and misses an opportunity to maximise provision of affordable housing on land majority owned by government. In addition to the residential floor area, there is over 100,000m^2 of non-residential use. These workers will create a demand for housing in the local area.

The SREP26 that applies to the Study Area requires a contribution for residential and non-residential uses.

It is important to note, that in addition to the Study Area, the new Sydney Fish market location also significantly increased the developable area from existing land and infilling of Blackwattle Bay without providing any contributions for affordable housing.

The approved new Sydney Fish market approved by the Minister for Planning and Public spaces in June 2020 provides:

- 725 ongoing jobs
- 26,751m^2 of GFA
- Unspecified number of visitors

Whilst job creation is important for the economy, suitable affordable housing must be supplied to meet the needs of the lower income workers in the area.

CWH recommends a target of 10% of all residential gross floor area for Affordable Housing.

VALUE OF THE AFFORDABLE HOUSING CONTRIBUTION

The Housing Diversity and Affordability May 2021 study by Hill PDA states that contributions required in the SREP26 are 2,175m^2 of GFA or $8.9m of cash. This ignores the 12% uplift requirement from the AH Program which equates to 14,742m^2, see table below for comparison.

	SSP Study	AH Program[1]	Comments
AH GFA Contribution %	5%	12%	
GFA Equivalent	6,143	14,742	
AH Equivalent Apartments	82	197	Based on average unit size of 75m^2
Cash Contribution	$8,900,000	$156,088,296	SSP study used rate of $1,448, AH Program rate is $10,588
Contribution value per AH Apt	$108,669	$794,100	

[1]*Excludes contributions required under SREP26*

The SSP Study adopted contribution rate is unacceptably low and does not correlate to either development costs for inner city apartments nor the fair market values of apartments in the suburb. The NSW Communities and Justice Sales report for the March 2021 quarter states that the median apartment sales price in Pyrmont was $1,427,000. A cash contribution of $8.9m could only purchase 6 apartments in the area, a significant shortfall to delivering 5% or 82 apartments in the Study Area.

The Study Area will significantly benefit from increased land values due to the material planning controls changes and Affordable Housing should be appropriately provisioned for.

CWH recommends that a cash contribution equivalent to the fair market apartment value for the suburb is levied on all residential development in the study area with the contribution provided to City West Housing as the City of Sydney's recommended community housing provider with a significant existing footprint and experience developing affordable housing apartments in the Pyrmont/Ultimo/Glebe area.

LAND DEDICATION

The Housing Diversity and Affordability May 2021 study by Hill PDA also states that "Of all approaches examined, the building-by-building approach presents the lowest level of risk and offers the great control for a community housing providers to deliver a cost efficient product."

A dedicated building for affordable housing can be secured by setting aside land to be developed into affordable housing. Ideally this land should be dedicated in the early stages to facilitate early delivery of affordable housing, similar to the approach Urban Growth NSW undertook when it dedicated a parcel of land to CWH for redevelopment in the ATP area for CWH's North Eveleigh development which was completed in 2015.

CWH supports the Hill PDA alternative for land dedication as detailed in Section 4.1.1.4 of their report whereby a parcel of land in the Study Area is dedicated to a community housing provider for development into community housing. This would be in addition to Affordable Housing cash contributions applicable to the Study Area.

The SSP Study summarises the key site constraints and opportunities for the Study Area and has a specific category for Social and Community Facilities (table 11 in study). The table highlights that there

is the opportunity for the "provision of affordable housing". Community and social infrastructure is further described in Figure 37 of the study, and provides a dedicated land area for each identified social and community facility opportunity with the exception of affordable housing. Why does affordable housing not have a dedicated area within the precinct? The lack of certainty for this essential social infrastructure leaves the opportunity for this use to be reduced or removed in future master plan revisions.

CWH recommends a land lot is identified and dedicated for development into fit for purpose Affordable Housing to City West Housing as the City of Sydney's recommended community housing provider.

REPEAL OF SYDNEY REGIONAL ENVIRONMENTAL PLAN NO 26 – CITY WEST (SREP 26)

The SSP Study requests repealing the application of Sydney Regional Environmental Plan No 26 – City West for the Study area in favour of a new provision in the Sydney LEP requiring a contribution towards affordable housing equivalent to 5% of the residential floor area. The contribution is proposed to be through dedication of apartments in the precinct or as a monetary contribution (with a rate to be determined).

The SREP26 details the contribution mechanisms and requirements. Repealing this without having clear formulas and criteria presents a material risk that the affordable housing provision will not be delivered as envisioned. There have been precedents with other State Significant Sites where affordable housing requirements were not clearly described and over time were watered down by developers in favour of profits from market housing.

For cash contributions, we agree with Hill PDA when they state "...appropriate monetary contributions by analysing the fair market value of residential units at the time" which is consistent with our recommendation above.

If an in-kind contribution is considered, then it should be in accordance with the AH Program section 2.1.5 "Satisfying a contribution by dedicating dwellings."

CWH recommends against repealing the application of Sydney Regional Environmental Plan No 26 – City West for the Study area in favour of a new provision in the Sydney LEP until a clear monetary contribution rate has been determined and a process for in-kind development is developed with feedback from community housing providers experienced in delivering affordable rental apartments. Additionally, the requirement for Affordable Housing should be at 10%.

4. CONCLUSION

CWH appreciates the opportunity to provide input on the SSP Study. We would welcome the opportunity to work with DPIE and provide further input on Blackwattle Bay.

Yours sincerely,

Lisa Sorrentino
Head of Development

182756

Stapleton

Glebe 2037

See uploaded file.

Coalition of Glebe Groups

Objection Blackwattle Bay State Significant Project

Since 2015, the Coalition of Glebe Groups (COGG) has had representation on The Bays Precinct Urban Transformation Program under the direction of UrbanGrowth NSW. The aim of NSW Government was to develop a Strategic Plan for the whole of the bays. Subsequently, the Greater Sydney Commission was formed. Further changes were made by Government that meant Pyrmont, Blackwattle Bay and Wentworth Park were excised from the Greater Sydney Plan, that overrode the current Development Control Plans under the control of City of Sydney.

As a result, projects such as New Sydney Fish Market have been marked for development in isolation and also marked as a State Significant Project. This development was designed before the onset on COVID-19 Pandemic and was relocated to the head of Blackwattle Bay to address issues of increased patronage and tourism. Thus releasing publicly owned land for private development.

Blackwattle Bay State Significant Project fails address the following concerns:

- Height and density is excessive and causes severe overshadowing
- There is no strategic plan to address the needs of cyclists and pedestrians
- There is an in adequate percentage of affordable housing
- Severe issues around wind tunnels between tall buildings
- No consideration about post COVID-19 planning
- No inclusion of Social Housing in the plan
- New Sydney Fish Market will be overshadowed in 9:00 and 3:00pm cycles, thus reducing the quality for visitors
- Lack of open space for residents
- No consideration for the needs of passive water users in Blackwattle Bay
- The current concept should reflect the 2021 Census when released.
- No Traffic Plan has been developed to demonstrate the impact on Glebe/Forest Lodge and its connection to WestConnex and proposed Sydney Harbour Tunnel.

The Blackwattle Bay State Significant Precinct proposal is a massive overdevelopment.

The proposal is for twelve buildings as follows:

1 x 45 Storey building (156 metres)
1 x 32 storey building (120 metres)

1 x 30 storey building	(110 metres)
2 x 25 storey buildings	(91.5 metres)
1 x 20 storey building	(75.5 metres)
1 x 19 storey building	(72 metres)
1 x 17 storey building	(65 metres)
2 x 10 storey buildings	(37.5 metres)
2 x 5 storey buildings	(21 metres)

The tallest buildings, with a maximum height of 45 storeys (156m) are higher than the pylons of Anzac Bridge (120m). They are far higher than the highest buildings on the Pyrmont peninsula. The urban form of Pyrmont should step down to the waterfront but the planning proposal is for a wall of very high buildings along Blackwattle Bay.
The height controls in the current Sydney City Council LEP are well considered and relate to the controls nearby. They provide for a maximum of 33 metres (9 storeys). There is no justification for changing this to a maximum height of 156 metres. Buildings of this height are only found in the CBD. There is no planning or economic justification for having this height on this site.

CONCLUSION

This development must be reconsidered in conjunction with current and Post COVID-19 issues.
The Plan asserts that the buildings will be tested by principles of good design. The building envelopes in the planning process are too dense and too tall.
Good design is about considering all the elements, including impact of the neighbouring buildings, ameliorating the impact of the Western Distributor and managing scale, sunlight, amenity, open space and the foreshore walk.
This proposal is primarily driven by density. The Blackwattle Bay Site must be open to an Open Design Panel.
The Blackwattle Bay State Significant Project, Statement of Intended Effect claims that *the overall design of the Blackwattle Bay Precinct Plan delivers a diverse, welcoming and inclusive place, and stays true to the essence of Pyrmont as an eclectic, vibrant and unique neighbourhood.*

If you have any questions please contact me on 0417 238 158.

Yours

Mark Stapleton
2021 Chair
COGG (Coalition of Glebe Groups)

181116

Stapleton

Glebe 2037

Jim Betts

Secretary

Department of Planning, Industry and Environment

Blackwattle Bay Submission,

Locked Bag 5022,

Parramatta NSW 2124

https://www.planning.nsw.gov.au/blackwattlebay

Dear Mr Betts

Re: Blackwattle Bay State Significant Precinct Study

I am a member of the Glebe Society which is committed to protecting and conserving the heritage, environment and community of Glebe. It was founded in 1969 and has over 400 current financial members. One of its proudest achievements is its role in reclaiming the land around the foreshores for the public as industry left the suburb, and the subsequent development of the foreshore walk and parks around Blackwattle and Rozelle Bays. Blackwattle Bay is one of the boundaries of Glebe, and The Glebe Society cherishes the Bay, its history, its natural values and its amenity.

I object in the strongest possible terms to virtually every detail of this study; to the assumptions, to the â€˜visionâ€™, to the proposed legislative and planning changes, and to the plan itself. I also object to the process recommended in Blackwattle Bay State Significant Project, Statement of Intended Effects.

The development should not be classified as State Significant because it constitutes extremely poor planning. The primary consideration has been density at the expense of other requirements, including important community-supported criteria, some of which are listed in the Appendices.

The land in question is public land, but we believe that not only does it not deliver any public good, the plans, if delivered, would be detrimental to the site, to the precinct, to Blackwattle Bay and to Glebe.

I believe the proposal is a massive overdevelopment of the site, and would bring more residents and workers to the area than could be sustained.

The foreshore walk is far too narrow. It would be overshadowed by the buildings and windy. Paths shared between pedestrians and cyclists do not work.

There is inadequate provision of affordable housing.

The needs of passive water users of Blackwattle Bay, the so called â€œblue spaceâ€ have been overlooked. The plan preferences private marinas over community users and access.

The plan states that 30 per cent of the area is public open space, but much of it is in overshadowed windy areas between tall buildings.

In September 2017, the NSW Government invited community members â€œto engage in the visioning for a future Blackwattle Bayâ€ and to contribute to the writing of a set of Design Principles to guide the preparation of the Precinct Plan. The result was 16 guiding principles.

However, the plan fails to fulfill 11 of its guiding principles, and there is no clear path to fulfilling another two. (Appendix 1).

The plan also fails to meet six of the nine objectives that apply to consultation with the community and stakeholders. (Appendix 2).

This development, and the construction of the new Sydney Fish Markets, are based on pre-Covid 19 pandemic thinking. Tourism from China has collapsed and workers and residents are leaving the CBD. The State Government faces having a ring of new, underutilised buildings around Blackwattle Bay, a Bay that belongs to the people of NSW.

For Glebe residents, the proposed development would literally overshadow the suburb in the early morning. The buildings would tower over the Bay, destroying the natural amenity of the Bay, and bring increased traffic pressure to our roads that will also have to cope with unacceptable increases in traffic and parking from the new Sydney Fish Markets.

Glebe residents and workers have fought, and continues to fight, to maintain Glebeâ€™s wonderful built heritage. The proposed development, touted as an extension of the CBD, would place further pressure on Glebe to yield to intrusive, inappropriate and unacceptable developments.

On the Pyrmont side, the Western Distributor is a shadowy chasm separating Pyrmont from Blackwattle Bay. It destroys the legibility of Pyrmont as a peninsula and is a gloomy wasteland redolent of danger which makes the pedestrian experience of walking across Pyrmont to the bay unpleasant.

The views to the west with the harbour in the foreground and beyond Glebe Point, with its interesting topography landscape and architecture, are beautiful and interesting. Great potential exists to open up these vistas. It is a distinguished, indeed, a painterly vista which allows the Distributor with its vertical stanchions and horizontal roadway to be read as a frame enclosing a great and beautiful landscape.

The proposal does not take advantage of these opportunities. Apart from a narrow slot of open space to the bay on the Miller Street axis, the proposal will make the Distributorâ€™s under croft even gloomier by enclosing it with a wall of buildings.

This is not the hallmark of distinguished place making. Blackwattle Bay provides an opportunity to show the world how clever design can ameliorate the impact of traffic engineering on a beautiful place. The scheme fails dismally in this regard.

The document correctly identifies Blackwattle Bay as an extraordinary opportunity to reconnect the harbour, its surrounding neighbourhoods and the city; to showcase Sydneyâ€™s living culture and stories of Country; to build an inclusive and iconic waterfront destination that celebrates innovation, diversity and community. (Blackwattle Bay State Significant Project Study, page 1).

The Plan fails that vision. (Appendix 1).

Consultation.

Groups in Glebe have participated over the years in a series of meetings, seminars and planning about the future of the Bays Precinct. The release of the three scenarios, titled â€œRevitalising Blackwattle Bayâ€, which included 45 storey towers in May 2020 was sprung on the community without consultation. The community was shocked by the proposal and overwhelmingly rejected it. The Plan again ignores the results of many consultations, and the wishes and aspirations of the community. The Plan fails six of its nine objectives for community consultation. (Appendix 2).

RECOMMENDATION 1. I request the Minister for Planning, Industry and Environment order a review of the proposals for Blackwattle Bay, and institutes genuine consultation with the community to produce plans that respect the environment, heritage and architectural scale of Blackwattle Bay.

Lack of a Master Plan

In March 2010, â€œTowards an Integrated Strategic Plan: Bays Precinctâ€ was presented to Government. It was the result of wide consultation. All master plans for Blackwattle and Rozelle Bays were cancelled when the Coalition Government was elected in 2012. Planning for the Bays passed to Urban Growth, and then Infrastructure NSW (INSW) where it remains.

The Plan is the result of a series of changes to planning legislation. It seeks changes to six State planning controls. (Blackwattle Bay State Significant Precinct Study (BBSSPS) page 96).

These include amending the Sydney Local Environment Plan 2012 to allow a maximum building height of 156, and removing the site from the Sydney Harbour Catchment SREP.

The Plan seeks to remove the requirement to prepare a Development Control Plan when proposed developments increase gross floor area. SREP 26 deals with the protection of views and the scenic quality of foreshores and waterways, but the Plan ignores that, instead producing a concept DA.

RECOMMENDATION 2. I request the preparation of a Master Plan as the basis for development. The terms of reference for the Master Plan should include:

. the height, bulk and configuration of the build form must reconnect Blackwattle Bay to Pyrmont

. the foreshore walk must be at least 30 metres wide

. height controls of the existing LEP must be respected

. the impact of the Western Distributor must be minimised through good design

. and the long-standing use of Blackwattle Bay by rowers must be protected by controlling other users.

The Master Plan should be prepared for public exhibition and the City of Sydney should be the consent authority for the development.

I seek compliance with SREP 26 that would ensure the development would enhance views and the scenic quality of foreshores and waterways.

The Blackwattle Bay State Significant Precinct proposal is a massive overdevelopment.

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The height controls in the current Sydney City Council LEP are well considered and relate to the controls nearby. They provide for a maximum of 33 metres (9 storeys). There is no justification for changing this to a maximum height of 156 metres. Buildings of this height are only found in the CBD. There is no planning or economic justification for having this height on this site.

It should be noted that the background planning documents identify the need for a well-designed fine grain network comprising streets, laneways and arcades which will enhance the accessibility of the waterfront and permeability of the precinct. This is not what is proposed.

The buildings are so tall they would cast shadows over Blackwattle Bay in the morning, including over the solar panels of the new Sydney Fish Market, and create wind tunnels between the buildings.

The buildings are too dense, and the expectation of 1,550 dwellings, 2,800 residents and 5,600 people employed there, would put further, damaging, pressure on an already very densely populated suburb.

The site itself is narrow, and overshadowed by the Western Distributor. This would create air pollution and noise problems for tenants of the proposed buildings. In fact, the lowest nine floors would fall outside government guidelines for apartment air quality and noise levels, so the plan is for those floors to be used for business and retail. Surely this puts the health of the workers in those businesses at risk.

The noise and air pollution from the Western Distributor would also mean it will not be possible to open windows on the north east side of the building adjacent to and above the western distributor, inhibiting natural ventilation. This compromises the vaunted sustainability of the proposal.

Sustainability is further compromised by lack of solar access. The BBSSPS states: â€œSetbacks, building separation, orientation and floor plate layouts across both sites ensure that 70% or more of the apartments in each residential tower are able to achieve a minimum of two hours of sunlight on the 21st of June (winter solstice) (p. 113).

What about the other 30 per cent?

Further, the determination of the Hymix concrete batching plant to remain at its Banks Street site, will mean the proposed residential, office and retail space will be immediately adjacent to a noise industrial site, with frequent truck movements, with the possibility of working 24/7. (BBSSPS page 71).

RECOMMENDATION 3: 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. Buildings should also conform to sustainable building standards.

The plan does not deliver a foreshore walk congruent with the walk along Johnstons Bay and around the Glebe foreshore. It is too narrow, too shadowed and too windy. At 10 metres wide it is too narrow to provide for the number of people who will use it, which would include pedestrians, shoppers and tourists milling about, cyclists, parents pushing strollers, wheelchair users and people walking dogs. If the Glebe foreshore is any indication, the proposed walk will come under heavy pressure.

The new Sydney Fish Markets is expected be a local, national and international tourist attraction. This, along with the completion of the â€˜missing linkâ€™ in the foreshore walk from Woolloomooloo to Rozelle Bay, means it will be used by large numbers of people.

I object to the path walk being a shared path (shared by both pedestrians and bicycles) which has been shown not to work on the Glebe foreshore walk. It needs to be at least 30 metres wide to accommodate so many different users, and to allow for separate paths for pedestrians and cyclists.

The parks proposed are small, narrow and piecemeal, and will be overshadowed for the first half of the day. They will also be windy, thanks to the proposed buildings creating wind tunnels. The City of Sydney has produced a map indicating 13 places on the proposed plan that are not safe, while 27 are not comfortable for walking. It also argues standing and sitting comfort is not considered.

The City of Sydney states the sunlight in the proposed parks is less than the Cityâ€™s requirements, and few, if any streets will have enough sunlight for good tree growth.

The BBSSPS states that 30 per cent of the site will be open space, but a narrow corridor between two towers, though counted in that percentage, does not fit that description.

The most recent inner city foreshore development, Barangaroo, allocated 50 per cent of the area to open space.

RECOMMENDATION 4: I believe 50 per cent of the area should be open space. The foreshore walk should be 30 metres wide, with separate paths for pedestrians and cyclists. Adequate seating must be provided.

Tree plantings must have adequate sunlight to grow and be protected from damaging winds.

The expectation that 80 to 85% of residents will not use private cars is unrealistic. It also borders on the bizarre, given the growing presence of Westconnex across the Bay that will deliver huge numbers of cars to the Bay. The BBSSPS in fact boasts that the major stages of Westconnex will be completed in 2023, â€œtwo of which [will] deliver road infrastructure to the Baysâ€. So many cars, so little parking.

Plans to improve public transport, including buses, light rail and ferries, to the area would be welcomed â€“ if they actually come into effect. Although the plan expects an increase in light rail services, it is understood the expansion of light rail, which prior to the pandemic was at capacity in peak hour, cannot be expanded due to the power supply, stabling, the single track and Dulwich Hill. (â€œExtra trams to east crowding on Sydneyâ€™s Inner West line still years away.â€ Sydney Morning Herald, July 2, 2019)

We note the new Sydney Fish Market (SFM), while expecting a doubling in visitor numbers over the next ten years, is not providing a single extra car space in the new building. Glebe residents fear our street parking spots will be overtaken by visitors to the SFM, and locals, most of whom do not have private parking spaces, will be disadvantaged. Despite the expectation of the planners, people will still want to own cars and to drive. The shortage of parking spaces will place even more pressure on Glebe.

RECOMMENDATION 5: Reduce the forecast population of residents and workers. Establish new public transport routes, including a ferry service to Blackwattle Bay, and where possible increase existing services.

Only five per cent of the residential supply would be affordable rental housing, or developers can make an equivalent monetary contribution, which can be used elsewhere. This has been the past experience in Pyrmont. There is a huge demand for affordable rental housing in the inner city.

The City of Sydney advocates 25 per cent for government owned land.

RECOMMENDATION 6: That 30 per cent of residents be affordable rental housing, comprising a mixture of one, two and three bedroom apartments. If the developer opts to make an equivalent monetary contribution, that must be invested in local affordable housing.

Blackwattle Bay is the prime attraction, but there are too many encroachments on it â€“ including the new Sydney Fish Market â€“ and inadequate consultation with water users.

The Glebe Rowing Club is the third oldest rowing club in Australia, founded in 1879. For over 150 years the local water sports clubs have provided the local community with inclusive and affordable access to the Bay.

The section of the report dealing with heritage makes no mention of the significance of the long presence of rowers and the rowing club in the Bay.

The current water users, which include members of the Glebe Rowing Club, the Sydney University Womenâ€™s Rowing Club and the Blackwattle Bay Dragon Boat Club, as well as canoers, kayakers, paddle boarders and sailors, access Blackwattle Bay for sport and recreation every day.

They are particularly concerned about the proposed marinas and increased motorised boat movements expanded on the â€œurban blue spaceâ€ of Blackwattle bay, and the safety of water users.

Private marinas are only available to a select few, while community sporting and recreation clubs, like rowing, dragon boating, and other individual small water craft are open to the entire community.

But instead of giving the community greater access to the waters of Blackwattle bay, the proposal hands valuable water space to corporate and charter marinas.

Denser communities have a greater need for open space, for opportunities to exercise. But the Plan does not adequately protect the existing community uses of the Bay, let alone provide the capacity to cater for the proposed increased population.

The new Sydney Fish Market will reduce the area of the Bay, and increase water traffic.

The plan will also lead to an increase in marine traffic, including ferries, but there is no plan to manage this safely.

RECOMMENDATION 7: Prioritise the needs and the voices of the community for access to Blackwattle Bay over those of the private marinas. Produce a marine safety plan, in consultation with passive water users.

The health of Blackwattle Bay has been overlooked.

As industry has moved out of Blackwattle Bay the water quality has improved. Over 25 fish species and 50 other organisms, including oysters, shrimp, limpets, sponges and algae have been found in the Bay. I oppose any move that would threaten this biodiversity.

Increased numbers and movements of large motor boats and commercial craft have the potential to stir up the sediment, which contains toxic sediments, including the heavy metals mercury, lead, zinc and copper, and other contaminants including asbestos, arsenic, polycyclic aromatic hydrocarbons and total petroleum hydrocarbon. All these have been found in the sediments at levels that exceed both â€œlow and high trigger value sediment quality guidelines protective of ecological communities.â€ (DA for Stage one of the New Sydney Fish Markets: (E.I.S. 7.10.3 p. 156).)

Marinas need solid, vertical sea walls, but these severely restrict marine ecosystems.

Around in the next Bay, Rozelle Bay, Sydney Water is rehabilitating Johnstons Creek. It is replacing a walled concrete channel with sloping rock beds, walls of differing heights, and creating a range niches to support and encourage a wider variety of marine and botanic life.

Blackwattle Bay once extended into the area now under Wentworth Park, in the form of a mangrove forest. Shane Phillips, from the Tribal Warrior which is moored on the Pyrmont side of Blackwattle Bay, told the gathering at a smoking ceremony for the new Sydney Fish Markets, that the mangrove forest was the fish market in pre-settlement times. This is a critical part of the areaâ€™s Indigenous heritage.

Bridge Road was so named because it was a bridge across the Bay.

Redeveloping the northern bank of Blackwattle Bay offers an unparalleled opportunity to restore the Bay, to provide access to the community, and to alter the sea walls to increase habitat for marine life.

RECOMMENDATION 8: Rehabilitate the Pyrmont side of Blackwattle Bay, incorporating rocky sloping beds, sandy beaches, and a range of ecological niches for marine organisms. I demand that the plan respects the areaâ€™s deep Indigenous heritage.

Around the Bays

It should also be noted that there are plans to develop the large swathe of state-government owned land along the adjacent Rozelle, White and Johnstons Bays. While the White Bay plan is in the early stages, the draft strategy includes illustrations of yet more high density buildings.

I fear that the Bays could end up ringed with towers, with only our heritage standing between Glebe and overdevelopment.

RECOMMENDATION 9: The plan must take into consideration development around the adjacent bays, and the impact of those plans on the local community and environment.

The COVID pandemic has changed how we live and work.

It should also be noted that the plans were all made before the Covid pandemic, which has changed tourism, and the way people live and work in the CBD.

The new $750 million Fish Market was planned on the expectation of visitor numbers doubling in the first ten years. This is largely based on the expectation of increased tourism, particularly from China. That tourism has ceased, and given the current state of the pandemic and relations between Australian and China, is unlikely to resume any time in the near future.

The pandemic and tensions with China have also impacted Chinese investment in real estate and overseas student demand for accommodation.

Since the pandemic, many CBD workers have opted to work from home, and many CBD residents have moved further afield. Vacancy rates for both CBD offices and apartments have soared. https://www.smh.com.au/business/companies/office-vacancies-hit-quarter-century-high-but-green-shoots-emerging-20210804-p58fpd.html, https://www.smh.com.au/money/investing/vacancy-rates-still-high-for-inner-city-rentals-20210416-p57jtc.html

The proposed Blackwattle Bay development, along with the new Fish Market, risks falling victim to the Covid pandemic, adding to the oversupply of vacant residential and office space in the CBD, and financial stress for the developer.

RECOMMENDATION 10: INSW should engage independent consultants to put together a report on the projected impact of Covid and tensions with China on longer term demand for housing and commercial space in the area.

Finally, it is our understanding that the massive overdevelopment is intended to recoup the $750 million cost of the new Sydney Fish Markets. It would have been better to rebuild the Fish Market on the current site. The vendors at the Fish Market objected to having the Market rebuilt while they continued trading. The community lost that fight, but Glebe and Pyrmont should not have to pay the price of the recalcitrance of the Market vendors, and the ambitions of the stateâ€™s tourism industry.

RECOMMENDATION 11: The cost of construction of the new Sydney Fish Market should be shared between the State Government and the industries that expect to benefit from it. It should not be earned from the over development of the current Fish Market site.

CONCLUSION.

The Plan asserts that the buildings will be tested by principles of good design. This is fallacious. The building envelopes in the planning process are too dense and too tall.

Good design is about considering all the elements, including impact of the neighbouring buildings, ameliorating the gash of the Western Distributor and managing scale, sunlight, amenity, open space and the foreshore walk.

This proposal is primarily driven by density. The scheme is fatally flawed because it starts with bad design. It is misleading to claim that a bad plan can be rectified by a design code. It cannot.

The Blackwattle Bay State Significant Project, Statement of Intended Effect claims that the overall design of the Blackwattle Bay Precinct Plan delivers a diverse, welcoming and inclusive place, and stays true to the essence of Pyrmont as an eclectic, vibrant and unique neighbourhood. Even in the age of spin it is rare to encounter such a huge disjunction between claims and reality.

Sincerely yours

Mark Stapleton

0417 238 158

APPENDIX 1.

The plan lists 16 guiding principles. BBSSPS page xiii.

How does the proposal stack up against its sixteen guiding principles?

Principle 1: Improve access to Blackwattle Bay, the foreshore and water activities for all users.

It fails.

By cutting off vistas of the Bay instead of opening them up it reduces access. The promenade is not wide enough.

Principle 2: Minimise additional shadowing to Wentworth Park and Glebe Foreshore (in mid-winter) and create new places with comfortable conditions for people to enjoy.

It fails.

The tall buildings proposed will cause overshadowing.

Principle 4: Prioritise movement by walking, cycling and public transport.

It fails.

A priority should be to use clever design to ameliorate the impact of the Western Distributor and enhance the experience of pedestrians walking from the city and Pyrmont.

Principle 6: Link the Blackwattle Bay precinct to the City, Glebe Island and White Bay and other surrounding communities and attractors.

It fails.

The promenade is not wide enough.

Principle 7: Mandate Design Excellence in the public and private domain.

It fails.

The building form is too dense. Starting with bad design is not mandating design excellence.

Principle 8: Integrate housing, employment and mixed uses to create a vibrant, walkable, mixed use precinct on the cityâ€™s edge.

It fails.

More affordable housing is needed. It is not clear from the studies that the commercial uses will be vibrant or viable.

Principle 9: Maintain and enhance water uses and activities.

It fails.

No proper consideration has been given to the continued use of the Bay for rowing. This is threatened by unplanned introduction of other uses. The Bay houses Sydneyâ€™s third oldest rowing club. There is a living heritage of rowing on Blackwattle Bay stretching back almost 150 years. This must be respected.

Principle 11: A place for everyone that is inviting, unique in character, socially inclusive and affordable.

It fails.

The overdevelopment is not inviting. Burying the harbourâ€™s edge in a mountain of masonry does not respect character, Many of the apartments will have unacceptable levels of noise and air pollution. There is an inadequate amount of affordable housing.

Principle 12: Expand the range of recreational, community and cultural facilities.

Unclear.

Principle 13: Plan for the future communityâ€™s education, health, social and cultural needs.

Unclear.

Principle 14: Deliver development that is economically, socially, culturally and environmentally viable.

It fails.

The development does not respect the landscape or the character of Pyrmont. The lower floors adjacent to the Western Distributor will suffer noise and air pollution. Only 70% of apartments have adequate solar access.

Principle 15: Embed and interpret the morphology, heritage and culture of the site to create an authentic and site responsive place.

It fails. Heritage is about the tangible. In the case of Blackwattle Bay and the Pyrmont Peninsula, caring for heritage is about respecting the land and its topography, not burying it in a mountain of masonry and exacerbating, rather than ameliorating, the impact of the Western Distributor.

The Blackwattle Bay Precinct Study identifies â€œthe need to better represent and engage knowledge and values of First Nationsâ€ (p. 99), and says the precinct should â€œcelebrate the cultural importance of Blackwattle Bay to the Wangal and Gadigal peopleâ€. The stories of the traditional ownersâ€™ connections with the land will be richer if the topography remains legible.

Principle 16: Foster social and cultural understanding and respect to heal and grow relationships.

It fails.

In the community consultation process in 2020 the public were presented with three schemes all of which involved very dense development. Information was scanty on how important things such as reconnecting Blackwattle Bay to the Pyrmont peninsula would be achieved. This felt like a pseudo consultation done as a box ticking exercise and not based on respect.

APPENDIX 2.

To help guide the project the following nine objectives were developed having regard to consultation undertaken with the community and stakeholders since 2014: (BBSSPS p.9)

Objective 1: Deliver a new retail and wholesale fish market at the head of Blackwattle Bay that is one of global Sydneyâ€™s key tourist attractions

Fails to realise its potential.

The new Fish Market will be a more successful tourist attraction if it is in an attractive setting, not adjoining a massive overdevelopment which abuts a gloomy flyover.

Objective 2: Deliver a continuous foreshore promenade connecting Glebe foreshore to Pyrmont, which is activated, connected and resilient

It fails.

Resilient means being wide enough to accommodate its users. What is proposed is not fit for the purpose.

Objective 3: Design and deliver a high-quality public domain that links Blackwattle Bay to the foreshore and Wentworth Park and integrates with the wider public domain

It fails.

It does not integrate with Pyrmont and the height of the buildings are intrusive.

Objective 6: Deliver housing affordability and diversity consistent with government policy â€“ Towards our Greater Sydney 2056 and the Eastern City District Plan

It fails.

There is very little affordable housing provided and no public housing.

Objective 8: Provide social infrastructure including recreation and open space to support the overall population needs

It fails.

Too many buildings and not enough open space.

Objective 9: Optimise financial and economic benefits to NSW.

It fails.

In the knowledge based economies of the 21st century liveability and attractiveness are key factors which attract innovators and entrepreneurs. The plan fails to capitalise on the opportunities offered by its setting to improve the western edge of the Pyrmont peninsula. It is very second rate and uninspiring.

Jim Betts
Secretary
Department of Planning, Industry and Environment
Blackwattle Bay Submission,
Locked Bag 5022,
Parramatta NSW 2124
https://www.planning.nsw.gov.au/blackwattlebay

Dear Mr Betts

Re: Blackwattle Bay State Significant Precinct Study

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I object in the strongest possible terms to virtually every detail of this study; to the assumptions, to the 'vision', to the proposed legislative and planning changes, and to the plan itself. I also object to the process recommended in Blackwattle Bay State Significant Project, Statement of Intended Effects.
The development should not be classified as State Significant because it constitutes extremely poor planning. The primary consideration has been density at the expense of other requirements, including important community-supported criteria, some of which are listed in the Appendices.
The land in question is public land, but we believe that not only does it not deliver any public good, the plans, if delivered, would be detrimental to the site, to the precinct, to Blackwattle Bay and to Glebe.
I believe the proposal is a massive overdevelopment of the site, and would bring more residents and workers to the area than could be sustained.
The foreshore walk is far too narrow. It would be overshadowed by the buildings and windy. Paths shared between pedestrians and cyclists do not work.
There is inadequate provision of affordable housing.
The needs of passive water users of Blackwattle Bay, the so called "blue space" have been overlooked. The plan preferences private marinas over community users and access.
The plan states that 30 per cent of the area is public open space, but much of it is in overshadowed windy areas between tall buildings.
In September 2017, the NSW Government invited community members "to engage in the visioning for a future Blackwattle Bay" and to contribute to the writing of a set of Design Principles to guide the preparation of the Precinct Plan. The result was 16 guiding principles.
However, the plan fails to fulfill 11 of its guiding principles, and there is no clear path to fulfilling another two. (Appendix 1).
The plan also fails to meet six of the nine objectives that apply to consultation with the community and stakeholders. (Appendix 2).
This development, and the construction of the new Sydney Fish Markets, are based on pre-Covid 19 pandemic thinking. Tourism from China has collapsed and workers and residents are leaving the CBD. The State Government faces having a ring of new, underutilised buildings around Blackwattle Bay, a Bay that belongs to the people of NSW.

For Glebe residents, the proposed development would literally overshadow the suburb in the early morning. The buildings would tower over the Bay, destroying the natural amenity of the Bay,

and bring increased traffic pressure to our roads that will also have to cope with unacceptable increases in traffic and parking from the new Sydney Fish Markets.
Glebe residents and workers have fought, and continues to fight, to maintain Glebe's wonderful built heritage. The proposed development, touted as an extension of the CBD, would place further pressure on Glebe to yield to intrusive, inappropriate and unacceptable developments.

On the Pyrmont side, the Western Distributor is a shadowy chasm separating Pyrmont from Blackwattle Bay. It destroys the legibility of Pyrmont as a peninsula and is a gloomy wasteland redolent of danger which makes the pedestrian experience of walking across Pyrmont to the bay unpleasant.
The views to the west with the harbour in the foreground and beyond Glebe Point, with its interesting topography landscape and architecture, are beautiful and interesting. Great potential exists to open up these vistas. It is a distinguished, indeed, a painterly vista which allows the Distributor with its vertical stanchions and horizontal roadway to be read as a frame enclosing a great and beautiful landscape.
The proposal does not take advantage of these opportunities. Apart from a narrow slot of open space to the bay on the Miller Street axis, the proposal will make the Distributor's under croft even gloomier by enclosing it with a wall of buildings.
This is not the hallmark of distinguished place making. Blackwattle Bay provides an opportunity to show the world how clever design can ameliorate the impact of traffic engineering on a beautiful place. The scheme fails dismally in this regard.
The document correctly identifies Blackwattle Bay as *an extraordinary opportunity to reconnect the harbour, its surrounding neighbourhoods and the city; to showcase Sydney's living culture and stories of Country; to build an inclusive and iconic waterfront destination that celebrates innovation, diversity and community.* (Blackwattle Bay State Significant Project Study, page 1).
The Plan fails that vision. (Appendix 1).

Consultation.
Groups in Glebe have participated over the years in a series of meetings, seminars and planning about the future of the Bays Precinct. The release of the three scenarios, titled "Revitalising Blackwattle Bay", which included 45 storey towers in May 2020 was sprung on the community without consultation. The community was shocked by the proposal and overwhelmingly rejected it.
The Plan again ignores the results of many consultations, and the wishes and aspirations of the community. The Plan fails six of its nine objectives for community consultation. (Appendix 2).

RECOMMENDATION 1. I request the Minister for Planning, Industry and Environment order a review of the proposals for Blackwattle Bay, and institutes genuine consultation with the community to produce plans that respect the environment, heritage and architectural scale of Blackwattle Bay.

Lack of a Master Plan
In March 2010, "Towards an Integrated Strategic Plan: Bays Precinct" was presented to Government. It was the result of wide consultation. All master plans for Blackwattle and Rozelle Bays were cancelled when the Coalition Government was elected in 2012. Planning for the Bays passed to Urban Growth, and then Infrastructure NSW (INSW) where it remains.
The Plan is the result of a series of changes to planning legislation. It seeks changes to six State planning controls. (Blackwattle Bay State Significant Precinct Study (BBSSPS) page 96).
These include amending the Sydney Local Environment Plan 2012 to allow a maximum building height of 156, and removing the site from the Sydney Harbour Catchment SREP.
The Plan seeks to remove the requirement to prepare a Development Control Plan when proposed developments increase gross floor area. SREP 26 deals with the protection of views and the scenic quality of foreshores and waterways, but the Plan ignores that, instead producing a concept DA.

RECOMMENDATION 2. I request the preparation of a Master Plan as the basis for development. The terms of reference for the Master Plan should include:
. the height, bulk and configuration of the build form must reconnect Blackwattle Bay to Pyrmont
. the foreshore walk must be at least 30 metres wide
. height controls of the existing LEP must be respected
. the impact of the Western Distributor must be minimised through good design
. and the long-standing use of Blackwattle Bay by rowers must be protected by controlling other users.
The Master Plan should be prepared for public exhibition and the City of Sydney should be the consent authority for the development.
I seek compliance with SREP 26 that would ensure the development would enhance views and the scenic quality of foreshores and waterways.

The Blackwattle Bay State Significant Precinct proposal is a massive overdevelopment.
The proposal is for twelve buildings as follows:

1 x 45 Storey building	(156 metres)
1 x 32 storey building	(120 metres)
1 x 30 storey building	(110 metres)
2 x 25 storey buildings	(91.5 metres)
1 x 20 storey building	(75.5 metres)
1 x 19 storey building	(72 metres)
1 x 17 storey building	(65 metres)
2 x 10 storey buildings	(37.5 metres)
2 x 5 storey buildings	(21 metres).

The tallest buildings, with a maximum height of 45 storeys (156m) are higher than the pylons of Anzac Bridge (120m). They are far higher than the highest buildings on the Pyrmont peninsula.
The urban form of Pyrmont should step down to the waterfront but the planning proposal is for a wall of very high buildings along Blackwattle Bay.
The height controls in the current Sydney City Council LEP are well considered and relate to the controls nearby. They provide for a maximum of 33 metres (9 storeys). There is no justification for changing this to a maximum height of 156 metres. Buildings of this height are only found in the CBD. There is no planning or economic justification for having this height on this site.
It should be noted that the background planning documents identify the need for *a well-designed fine grain network comprising streets, laneways and arcades which will enhance the accessibility of the waterfront and permeability of the precinct.* This is not what is proposed.
The buildings are so tall they would cast shadows over Blackwattle Bay in the morning, including over the solar panels of the new Sydney Fish Market, and create wind tunnels between the buildings.
The buildings are too dense, and the expectation of 1,550 dwellings, 2,800 residents and 5,600 people employed there, would put further, damaging, pressure on an already very densely populated suburb.
The site itself is narrow, and overshadowed by the Western Distributor. This would create air pollution and noise problems for tenants of the proposed buildings. In fact, the lowest nine floors would fall outside government guidelines for apartment air quality and noise levels, so the plan is for those floors to be used for business and retail. Surely this puts the health of the workers in those businesses at risk.
The noise and air pollution from the Western Distributor would also mean it will not be possible to open windows on the north east side of the building adjacent to and above the western distributor, inhibiting natural ventilation. This compromises the vaunted sustainability of the proposal.
Sustainability is further compromised by lack of solar access. The BBSSPS states: “Setbacks, building separation, orientation and floor plate layouts across both sites ensure that 70% or more of the apartments in each residential tower are able to achieve a minimum of two hours of sunlight on the 21st of June (winter solstice) (p. 113).
What about the other 30 per cent?

Further, the determination of the Hymix concrete batching plant to remain at its Banks Street site, will mean the proposed residential, office and retail space will be immediately adjacent to a noise industrial site, with frequent truck movements, with the possibility of working 24/7. (BBSSPS page 71).

RECOMMENDATION 3: 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. Buildings should also conform to sustainable building standards.

The plan does not deliver a foreshore walk congruent with the walk along Johnstons Bay and around the Glebe foreshore. It is too narrow, too shadowed and too windy. At 10 metres wide it is too narrow to provide for the number of people who will use it, which would include pedestrians, shoppers and tourists milling about, cyclists, parents pushing strollers, wheelchair users and people walking dogs. If the Glebe foreshore is any indication, the proposed walk will come under heavy pressure.
The new Sydney Fish Markets is expected be a local, national and international tourist attraction. This, along with the completion of the 'missing link' in the foreshore walk from Woolloomooloo to Rozelle Bay, means it will be used by large numbers of people.
I object to the path walk being a shared path (shared by both pedestrians and bicycles) which has been shown not to work on the Glebe foreshore walk. It needs to be at least 30 metres wide to accommodate so many different users, and to allow for separate paths for pedestrians and cyclists.
The parks proposed are small, narrow and piecemeal, and will be overshadowed for the first half of the day. They will also be windy, thanks to the proposed buildings creating wind tunnels. The City of Sydney has produced a map indicating 13 places on the proposed plan that are not safe, while 27 are not comfortable for walking. It also argues standing and sitting comfort is not considered.
The City of Sydney states the sunlight in the proposed parks is less than the City's requirements, and few, if any streets will have enough sunlight for good tree growth.
The BBSSPS states that 30 per cent of the site will be open space, but a narrow corridor between two towers, though counted in that percentage, does not fit that description.
The most recent inner city foreshore development, Barangaroo, allocated 50 per cent of the area to open space.

RECOMMENDATION 4: I believe 50 per cent of the area should be open space. The foreshore walk should be 30 metres wide, with separate paths for pedestrians and cyclists. Adequate seating must be provided.
Tree plantings must have adequate sunlight to grow and be protected from damaging winds.

The expectation that 80 to 85% of residents will not use private cars is unrealistic. It also borders on the bizarre, given the growing presence of Westconnex across the Bay that will deliver huge numbers of cars to the Bay. The BBSSPS in fact boasts that the major stages of Westconnex will be completed in 2023, "two of which [will] deliver road infrastructure to the Bays". So many cars, so little parking.
Plans to improve public transport, including buses, light rail and ferries, to the area would be welcomed – if they actually come into effect. Although the plan expects an increase in light rail services, it is understood the expansion of light rail, which prior to the pandemic was at capacity in peak hour, cannot be expanded due to the power supply, stabling, the single track and Dulwich Hill. ("Extra trams to east crowding on Sydney's Inner West line still years away." Sydney Morning Herald, July 2, 2019)
We note the new Sydney Fish Market (SFM), while expecting a doubling in visitor numbers over the next ten years, is not providing a single extra car space in the new building. Glebe residents fear our street parking spots will be overtaken by visitors to the SFM, and locals, most of whom do

not have private parking spaces, will be disadvantaged. Despite the expectation of the planners, people will still want to own cars and to drive. The shortage of parking spaces will place even more pressure on Glebe.

RECOMMENDATION 5: Reduce the forecast population of residents and workers. Establish new public transport routes, including a ferry service to Blackwattle Bay, and where possible increase existing services.

Only five per cent of the residential supply would be affordable rental housing, or developers can make an equivalent monetary contribution, which can be used elsewhere. This has been the past experience in Pyrmont. There is a huge demand for affordable rental housing in the inner city.
The City of Sydney advocates 25 per cent for government owned land.

RECOMMENDATION 6: That 30 per cent of residents be affordable rental housing, comprising a mixture of one, two and three bedroom apartments. If the developer opts to make an equivalent monetary contribution, that must be invested in local affordable housing.

Blackwattle Bay is the prime attraction, but there are too many encroachments on it – including the new Sydney Fish Market – and inadequate consultation with water users.
The Glebe Rowing Club is the third oldest rowing club in Australia, founded in 1879. For over 150 years the local water sports clubs have provided the local community with inclusive and affordable access to the Bay.
The section of the report dealing with heritage makes no mention of the significance of the long presence of rowers and the rowing club in the Bay.
The current water users, which include members of the Glebe Rowing Club, the Sydney University Women's Rowing Club and the Blackwattle Bay Dragon Boat Club, as well as canoers, kayakers, paddle boarders and sailors, access Blackwattle Bay for sport and recreation every day.
They are particularly concerned about the proposed marinas and increased motorised boat movements expanded on the "urban blue space" of Blackwattle bay, and the safety of water users.
Private marinas are only available to a select few, while community sporting and recreation clubs, like rowing, dragon boating, and other individual small water craft are open to the entire community.
But instead of giving the community greater access to the waters of Blackwattle bay, the proposal hands valuable water space to corporate and charter marinas.
Denser communities have a greater need for open space, for opportunities to exercise. But the Plan does not adequately protect the existing community uses of the Bay, let alone provide the capacity to cater for the proposed increased population.
The new Sydney Fish Market will reduce the area of the Bay, and increase water traffic.
The plan will also lead to an increase in marine traffic, including ferries, but there is no plan to manage this safely.

RECOMMENDATION 7: Prioritise the needs and the voices of the community for access to Blackwattle Bay over those of the private marinas. Produce a marine safety plan, in consultation with passive water users.

The health of Blackwattle Bay has been overlooked.
As industry has moved out of Blackwattle Bay the water quality has improved. Over 25 fish species and 50 other organisms, including oysters, shrimp, limpets, sponges and algae have been found in the Bay. I oppose any move that would threaten this biodiversity.
Increased numbers and movements of large motor boats and commercial craft have the potential to stir up the sediment, which contains toxic sediments, including the heavy metals mercury, lead, zinc and copper, and other contaminants including asbestos, arsenic, polycyclic aromatic hydrocarbons and total petroleum hydrocarbon. All these have been found in the sediments at

levels that exceed both “low and high trigger value sediment quality guidelines protective of ecological communities.” (DA for Stage one of the New Sydney Fish Markets: *(E.I.S. 7.10.3 p. 156).*)

Marinas need solid, vertical sea walls, but these severely restrict marine ecosystems.
Around in the next Bay, Rozelle Bay, Sydney Water is rehabilitating Johnstons Creek. It is replacing a walled concrete channel with sloping rock beds, walls of differing heights, and creating a range niches to support and encourage a wider variety of marine and botanic life.
Blackwattle Bay once extended into the area now under Wentworth Park, in the form of a mangrove forest. Shane Phillips, from the Tribal Warrior which is moored on the Pyrmont side of Blackwattle Bay, told the gathering at a smoking ceremony for the new Sydney Fish Markets, that the mangrove forest was the fish market in pre-settlement times. This is a critical part of the area’s Indigenous heritage.
Bridge Road was so named because it was a bridge across the Bay.
Redeveloping the northern bank of Blackwattle Bay offers an unparalleled opportunity to restore the Bay, to provide access to the community, and to alter the sea walls to increase habitat for marine life.

RECOMMENDATION 8: Rehabilitate the Pyrmont side of Blackwattle Bay, incorporating rocky sloping beds, sandy beaches, and a range of ecological niches for marine organisms. I demand that the plan respects the area’s deep Indigenous heritage.

Around the Bays
It should also be noted that there are plans to develop the large swathe of state-government owned land along the adjacent Rozelle, White and Johnstons Bays. While the White Bay plan is in the early stages, the draft strategy includes illustrations of yet more high density buildings.
I fear that the Bays could end up ringed with towers, with only our heritage standing between Glebe and overdevelopment.

RECOMMENDATION 9: The plan must take into consideration development around the adjacent bays, and the impact of those plans on the local community and environment.

The COVID pandemic has changed how we live and work.
It should also be noted that the plans were all made before the Covid pandemic, which has changed tourism, and the way people live and work in the CBD.
The new $750 million Fish Market was planned on the expectation of visitor numbers doubling in the first ten years. This is largely based on the expectation of increased tourism, particularly from China. That tourism has ceased, and given the current state of the pandemic and relations between Australian and China, is unlikely to resume any time in the near future.
The pandemic and tensions with China have also impacted Chinese investment in real estate and overseas student demand for accommodation.
Since the pandemic, many CBD workers have opted to work from home, and many CBD residents have moved further afield. Vacancy rates for both CBD offices and apartments have soared.
https://www.smh.com.au/business/companies/office-vacancies-hit-quarter-century-high-but-green-shoots-emerging-20210804-p58fpd.html, https://www.smh.com.au/money/investing/vacancy-rates-still-high-for-inner-city-rentals-20210416-p57jtc.html
The proposed Blackwattle Bay development, along with the new Fish Market, risks falling victim to the Covid pandemic, adding to the oversupply of vacant residential and office space in the CBD, and financial stress for the developer.

RECOMMENDATION 10: INSW should engage independent consultants to put together a report on the projected impact of Covid and tensions with China on longer term demand for housing and commercial space in the area.

Finally, it is our understanding that the massive overdevelopment is intended to recoup the $750 million cost of the new Sydney Fish Markets. It would have been better to rebuild the Fish Market on the current site. The vendors at the Fish Market objected to having the Market rebuilt while they continued trading. The community lost that fight, but Glebe and Pyrmont should not have to pay the price of the recalcitrance of the Market vendors, and the ambitions of the state's tourism industry.

RECOMMENDATION 11: The cost of construction of the new Sydney Fish Market should be shared between the State Government and the industries that expect to benefit from it. It should not be earned from the over development of the current Fish Market site.

CONCLUSION.
The Plan asserts that the buildings will be tested by principles of good design. This is fallacious. The building envelopes in the planning process are too dense and too tall.
Good design is about considering all the elements, including impact of the neighbouring buildings, ameliorating the gash of the Western Distributor and managing scale, sunlight, amenity, open space and the foreshore walk.
This proposal is primarily driven by density. The scheme is fatally flawed because it starts with bad design. It is misleading to claim that a bad plan can be rectified by a design code. It cannot.
The Blackwattle Bay State Significant Project, Statement of Intended Effect claims that *the overall design of the Blackwattle Bay Precinct Plan delivers a diverse, welcoming and inclusive place, and stays true to the essence of Pyrmont as an eclectic, vibrant and unique neighbourhood.* Even in the age of spin it is rare to encounter such a huge disjunction between claims and reality.

Sincerely yours

Mark Stapleton
0417 238 158

APPENDIX 1.

The plan lists 16 guiding principles. BBSSPS page xiii.

How does the proposal stack up against its sixteen guiding principles?

Principle 1: Improve access to Blackwattle Bay, the foreshore and water activities for all users.

It fails.

By cutting off vistas of the Bay instead of opening them up it reduces access. The promenade is not wide enough.

Principle 2: Minimise additional shadowing to Wentworth Park and Glebe Foreshore (in mid-winter) and create new places with comfortable conditions for people to enjoy.

It fails.

The tall buildings proposed will cause overshadowing.

Principle 4: Prioritise movement by walking, cycling and public transport.

It fails.

A priority should be to use clever design to ameliorate the impact of the Western Distributor and enhance the experience of pedestrians walking from the city and Pyrmont.

Principle 6: Link the Blackwattle Bay precinct to the City, Glebe Island and White Bay and other surrounding communities and attractors.

It fails.

The promenade is not wide enough.

Principle 7: Mandate Design Excellence in the public and private domain.

It fails.

The building form is too dense. Starting with bad design is not mandating design excellence.

Principle 8: Integrate housing, employment and mixed uses to create a vibrant, walkable, mixed use precinct on the city's edge.

It fails.

More affordable housing is needed. It is not clear from the studies that the commercial uses will be vibrant or viable.

Principle 9: Maintain and enhance water uses and activities.

It fails.

No proper consideration has been given to the continued use of the Bay for rowing. This is threatened by unplanned introduction of other uses. The Bay houses Sydney's third oldest rowing club. There is a living heritage of rowing on Blackwattle Bay stretching back almost 150 years. This must be respected.

Principle 11: A place for everyone that is inviting, unique in character, socially inclusive and affordable.

It fails.

The overdevelopment is not inviting. Burying the harbour's edge in a mountain of masonry does not respect character, Many of the apartments will have unacceptable levels of noise and air pollution. There is an inadequate amount of affordable housing.

Principle 12: Expand the range of recreational, community and cultural facilities.

Unclear.

Principle 13: Plan for the future community's education, health, social and cultural needs.

Unclear.

Principle 14: Deliver development that is economically, socially, culturally and environmentally viable.

It fails.

The development does not respect the landscape or the character of Pyrmont. The lower floors adjacent to the Western Distributor will suffer noise and air pollution. Only 70% of apartments have adequate solar access.

Principle 15: Embed and interpret the morphology, heritage and culture of the site to create an authentic and site responsive place.

It fails. Heritage is about the tangible. In the case of Blackwattle Bay and the Pyrmont Peninsula, caring for heritage is about respecting the land and its topography, not burying it in a mountain of masonry and exacerbating, rather than ameliorating, the impact of the Western Distributor.

The Blackwattle Bay Precinct Study identifies “the need to better represent and engage knowledge and values of First Nations” (p. 99), and says the precinct should “celebrate the cultural importance of Blackwattle Bay to the Wangal and Gadigal people”. The stories of the traditional owners’ connections with the land will be richer if the topography remains legible.

Principle 16: Foster social and cultural understanding and respect to heal and grow relationships.

It fails.

In the community consultation process in 2020 the public were presented with three schemes all of which involved very dense development. Information was scanty on how important things such as reconnecting Blackwattle Bay to the Pyrmont peninsula would be achieved. This felt like a pseudo consultation done as a box ticking exercise and not based on respect.

APPENDIX 2.

To help guide the project the following nine objectives were developed having regard to consultation undertaken with the community and stakeholders since 2014: (BBSSPS p.9)

Objective 1: Deliver a new retail and wholesale fish market at the head of Blackwattle Bay that is one of global Sydney's key tourist attractions

Fails to realise its potential.

The new Fish Market will be a more successful tourist attraction if it is in an attractive setting, not adjoining a massive overdevelopment which abuts a gloomy flyover.

Objective 2: Deliver a continuous foreshore promenade connecting Glebe foreshore to Pyrmont, which is activated, connected and resilient

It fails.

Resilient means being wide enough to accommodate its users. What is proposed is not fit for the purpose.

Objective 3: Design and deliver a high-quality public domain that links Blackwattle Bay to the foreshore and Wentworth Park and integrates with the wider public domain

It fails.

It does not integrate with Pyrmont and the height of the buildings are intrusive.

Objective 6: Deliver housing affordability and diversity consistent with government policy – Towards our Greater Sydney 2056 and the Eastern City District Plan

It fails.

There is very little affordable housing provided and no public housing.

Objective 8: Provide social infrastructure including recreation and open space to support the overall population needs

It fails.

Too many buildings and not enough open space.

Objective 9: Optimise financial and economic benefits to NSW.

It fails.

In the knowledge based economies of the 21st century liveability and attractiveness are key factors which attract innovators and entrepreneurs. The plan fails to capitalise on the opportunities offered by its setting to improve the western edge of the Pyrmont peninsula. It is very second rate and uninspiring.

182536

Stephenson

Forest Lodge 2037

My submission is in the attached document

20 August 2021

Ian Stephenson
29 Lodge Street
Forest Lodge 2037

Department of Planning, Industry and Environment
Blackwattle Bay Submission
Locked Bag 5022 –
Parramatta NSW 2124
planning.nsw.gov.au/blackwattlebay

Dear Sir/Madam

Re: Blackwattle Bay State Significant Project

I am strongly opposed to both the planning and the process recommended in Blackwattle Bay State Significant Project, Statement of Intended Effect.

It is claimed that ***t****he overall design of the Blackwattle Bay Precinct Plan delivers a diverse, welcoming and inclusive place, and stays true to the essence of Pyrmont as an eclectic, vibrant and unique neighbourhood.* Even in the age of spin it is rare to encounter such a huge disjunction between claims and reality.

The basis of my objection to the proposed planning controls follows. It comprises tow sections:

Part A: The Controls
Part B: The Process

Part A: The Controls

1. **Harbourside Promenade**
   The Blackwattle Bay harbourside promenade is in part to be only 10 metres wide. This is too narrow. The harbourside promenade in Glebe is already heavily used and at times congested. We know from experience 10 metres is not wide enough.

   The new fish markets will be a local, national and international tourist attraction. This, along with the completion of the `missing link' in the foreshore walk from Circular Quay to Rozelle Bay, means it will be used by large numbers of people. Users will include pedestrians, joggers, people with infants in prams and cyclists.

   The promenade should ideally be 30 metres wide and at no point be less than 20 metres. This is achievable but under the present proposal the width of the promenade has been sacrificed in order to accommodate increased building density.

   The provision of arcades at the ground floor of the buildings is not a satisfactory solution to the narrow promenade. Building density needs to be decreased and the width of the promenade increased. The promenade will be there forever, making it too narrow is a serious design flaw which future generations will rue. It must be wider.

2. **Impact on Rowing**
Blackwattle Bay accommodates a number of rowing and boating clubs including the Glebe Rowing Club. The Glebe Rowing Club was founded in 1879 and is the third oldest rowing club in Sydney. The section of the report dealing with heritage makes no mention of the significance of this 150-year use and the importance of controlling the additional use of the bay by motorboats in order to ensure that the long-standing use of the bay for rowing remains safe and viable.

3. **Excessive height**
The proposal is for twelve buildings as follows:

1 x 45 Storey building (156 metres)
1 x 32 storey building (120 metres)
1 x 30 storey building (110 metres)
2 x 25 storey buildings (91.5 metres)
1 x 20 storey building (75.5 metres)
1 x 19 storey building (72 metres)
1 x 17 storey building (65 metres)
2 x 10 storey buildings (37.5 metres)
2 x 5 storey buildings (21 metres)

They are far higher than the highest buildings on the Pyrmont peninsula. The urban form of Pyrmont should step down to the waterfront but the planning proposal is for a wall of very high buildings along Blackwattle Bay.

The height controls in the current Sydney City Council LEP are well considered and relate to the buildings nearby. The provide for a maximum of 33 metres (9 storeys). There is no justification for changing this to a maximum height of 156 metres. Buildings of this height are only found in the CBD. There is no planning or economic justification for having this height on this site.

It should be noted that the background planning documents identify the need for *a well-designed fine grain network comprising streets, laneways and arcades which will enhance the accessibility of the waterfront and permeability of the precinct.* This is not what is proposed.

4. **Amenity and Liveability**
The residential developments will suffer from unacceptable levels of noise from the Western Distributor, unacceptable levels of air pollution from the Western Distributor and do not meet the standards for cross ventilation and will therefore be reliant on mechanical cooling and will not be energy efficient. They will also impact on the amenity of existing apartments in Pyrmont.

5. **Noise**
The proposal that the Blackwattle Bay precinct be a 24-hour activity precinct is incompatible with a residential district. As sound carries across water the residents of both Pyrmont and Glebe will be affected. There must be an appropriate balance between recreation and residential amenity

6. Relationship to the Pyrmont Peninsula

The document correctly identifies Blackwattle Bay as *an extraordinary opportunity to reconnect the harbour, its surrounding neighbourhoods and the city; to showcase Sydney's living culture and stories of Country; to build an inclusive and iconic waterfront destination that celebrates innovation, diversity and community.* However, the planning fails miserably to do this.

The Western Distributor is a shadowy chasm separating Pyrmont from Blackwattle Bay. It destroys the legibility of Pyrmont as a peninsula, is a gloomy wasteland and feels like an unsafe area. This makes the pedestrian experience of walking across Pyrmont to the bay unpleasant.

The views to the west with the harbour in the foreground and Glebe Point with its beautiful landscape and architecture in the distance framing the horizon are picturesque.

Great potential exists to open up these vistas. It is a distinguished, indeed, a painterly vista which allows the Distributor with its vertical stanchions and horizontal roadway to be read as a frame enclosing a magnificent landscape.

The proposal does not take advantage of these opportunities. Apart from a narrow slot of open space to the bay on the Miller Street axis the proposal will make the Distributor's under croft even more depressing by enclosing it with a wall of buildings.

This is not the hallmark of distinguished place making. Blackwattle Bay provides the opportunity to show the world how clever design can ameliorate the impact of traffic engineering on a beautiful place. The scheme fails dismally in this regard.

7. Good Design

It is asserted that the buildings will be tested by principles of good design. This is fallacious. The building envelopes in the planning proposal are too dense and too tall.

Good design is about considering all the elements including impact on the neighbouring buildings, ameliorating the gash of the Western Distributor and managing scale, sunlight, amenity and the promenade.

This proposal is primarily driven by density. The scheme is fatally flawed because it starts with bad design. It is misleading to claim that a bad plan can be rectified by a design code. It cannot.

8. Affordable Housing

The provision of affordable housing is inadequate.

9. Heritage

Heritage is about the tangible. In the case of Blackwattle Bay and the Pyrmont Peninsula caring for heritage is about respecting the land and its topography not burying it in a mountain of masonry and exacerbating rather than ameliorating the impact of the Western Distributor.

The Blackwattle Bay Precinct Study identifies *the need to better represent and engage knowledge and values of First Nations* (p. 99) and says the precinct should *celebrate the*

cultural importance of Blackwattle Bay to the Wangal and Gadigal people. The stories of the traditional owner's connection with the land will be richer if the topography remains legible.

PART B: The Process

State Significance

The development should not be classified as being State Significant because it constitutes extremely poor planning where density has been the primary consideration at the expense of other requirements including important criteria established in related studies some of which are listed in Part C below.

The planning of Blackwattle Bay should be based on the preparation of a Master Plan. The terms of reference of the Master Plan should include the following requirements:

- That the promenade to be 30 metres wide and no less than 20 metres
- That the height, bulk and configuration of the built form to reconnect Blackwattle Bay to Pyrmont
- That the impact of the Western Distributor to be minimised through good design
- That the height controls of the existing LEP to be respected
- That the long-standing use of Blackwattle Bay by rowers be protected by controlling other uses

The Master Plan should be placed on public exhibition and the City of Sydney should be the consent authority for the development.

Yours sincerely

Ian Stephenson

182066

Stevensen

Glebe 2037

Please see my submission in the attached letter dated 9 August 2021.

TO: Department of Planning, Industry and Environment
Blackwattle Bay redevelopment submission
Locked Bag 5022 Parramatta NSW 2124

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E: tamira.stevensen@gmail.com

M: 0422 682 394

Submission on Blackwattle Bay State Significant Precinct Study dated 2 July 2021

I am a resident and business owner from Glebe, NSW. I object to the precinct plan's proposed changes in current regulations and planning instruments and the proposed development's concept design and scale.

I also object to the State Government changing its own planning rules to maximise profits from privatisation and sale of this public land to large developers with a development scale and design which ignores or circumscribes previous feedback from crucial stakeholders of Blackwattle Bay.

I will be concerned if community feedback on the *State Significant Precinct Study on the future of Blackwattle Bay* is not much more than Infrastructure NSW going through the motions of appearing to care about the impacted local communities but ignore them again.

1. A precinct plan for overdevelopment, poor design, and lack of amenity

1.1. The proposed wall of nine towers of massive bulk of anodyne design fails to create a people-friendly public domain promoting a sense of community and belonging for the Bays Precinct. Instead, the taller of the proposed multiple towers will overshadow the other buildings and create a sunless and windy Pyrmont local centre and detract from the character and charm of the surrounding buildings and the public domain in Glebe.

1.2. The precinct plan would allow a massive overdevelopment of the current site, including multiple high-rise towers of enormous bulk and scale dominating its surroundings. A wall of nine high-rise towers of between 7 stories and 45 stories high, close to the foreshore, with a total gross floor area (GFA) of approximately 234,000 square metres, and the construction of 1500 apartments is far too big for this site. These towering structures will completely dominate the currently open and distant views of Blackwattle Bay – and diminish the foreshore views now enjoyed by thousands of residents who live adjacent to these sites.

1.3. The proposed foreshore promenade is commendable. But the plans for the footpath must be updated so that the path is wide enough for continuous foreshore access between Glebe Island Bridge and the Sydney Fish Market by the increased number of people in the area. Currently, the footpath planned varies in width from 30 m to just 10 m along much of the path in front of the buildings proposed in the privately-owned areas. Even with the current volume of foot traffic around the Bay, the planned path's width variation will create a bottleneck of pedestrians, parents with strollers, joggers and cyclists. Therefore, serious consideration should be given to updating the plan and accommodating a 30 m wide footpath by decreasing the size of the proposed new buildings or constructing part of the walkway over the water. Especially so given that post-pandemic, social distancing will be recommended even for the vaccinated.

1.4. Despite the almost tripling of residents and workers on the site under the plan, it barely addresses likely increased road traffic and parking demands on the area – based on Infrastructure NSW's false assumption that private vehicle use will be no more than 20%.

1.5. The plan proposes a developer's contribution of only 2.5% of the total floor space, a level undoubtedly inadequate to mitigate or manage the increase in public infrastructure and facilities required for the additional 2800 residents in 1550 dwellings and 5600 jobs in the new commercial and retail floor space created. Suppose the developer pays its 2.5% developer's contribution in the form of affordable housing. There will not be enough affordable dwellings in the towers for essential service providers to live in that case. They will need to travel from other parts of Sydney to service the increased number of residents and workers located at Pyrmont, Blackwattle Bay.

1.6. The report fails to adequately set out a plan for public transport, including ferries and buses.

1.7. The plan is ambiguous about how the site developer will deliver its developer's contribution. Accordingly, it isn't easy to assess if the developer's contribution will adequately provide community facilities at Blackwattle Bay or redevelop the existing ones for the community, boating, and cultural uses such as the City of Sydney-owned Maybanke Community Centre.

1.8. The plan fails to flag any investment to accommodate the increased number of public-school students that will live in the estimated 1550 dwellings or travel to the site with working parents. The only high school (Sydney Secondary College Blackwattle Bay) caters only for years 11 and 12. It is already at capacity.

1.9. There must be a better plan for introducing public transport for students to attend school. The closest public primary school is one suburb away (Ultimo), and the nearest junior high schools are 5 km away (Leichhardt and Balmain campuses of Sydney Secondary College). Several bus routes cited in the report don't go anywhere near Pyrmont. Pyrmont currently has no bus services to Broadway shopping centre, Parramatta Road, Sydney University, and no ferry service.

1.10. The business case underlining the plan's allocation of 50% of the floor space to commercial offices and retail shops has become outdated in not factoring in the decreasing demand for CBD office space due to the lasting impact of work from home patterns post-pandemic, including knowledge workers moving to regional areas or already being catered for by other centrally-located new office space. Two other new tech hubs at Central Railway Station and White Bay Power Station, Rozelle, aim to provide attractive office space to fintech and other cutting-edge industries.

1.11. The business case assumes Chinese investment in CBD-based residential dwellings will continue at pre-pandemic levels. This assumption is over-optimistic given the geopolitical environment of bilateral tensions between Australia and China and the forecasted decrease in overseas students studying at Australian universities, including the University of Sydney.

2. Failures of processes/ Unjustified removal of local community rights

Also, I object to the NSW Government changing its own rules, therefore, removing the standard protections for existing local communities in the Blackwattle Bay surrounds, including Infrastructure NSW's FAILURE to:

2.1. Incorporate into the precinct plan a meaningful consideration of previous stakeholder feedback over many years that new buildings be of lower height to better integrate with the existing built form in Pyrmont and Glebe;

2.2. Reference the low to medium-rise form of heritage and modern terraces and heritage wool store buildings which lie between Pyrmont and the Sydney CBD;

2.3. Keep the standard requirements to protect public waterway views;

2.4. Not impede solar access to adjacent properties, including for the new Sydney Fish Markets site and its solar-panelled roof;

2.5. Keep the character and charm of surrounding buildings and public domain, including that any new buildings must be sympathetic to or enhance that character;

2.6. Ensure the City of Sydney council remains the consent authority for Blackwattle Bay area projects by public authorities under $10 million as per the standard planning provisions under the *Environmental Planning and Assessment Act 1979 (NSW)*, following local community consultations;

2.7. Keep the legal requirement of a Development Control Plan for developments with buildings more than 55 m high or a site more than 5000 m², and therefore for this site;

2.8. Keep the usual need for the City of Sydney council to have input under a Development Control Plan to the design details, including imposing consent conditions for the amelioration (so far unexamined) of wind conditions at a pedestrian level and new apartments' balcony level;

2.9. Keep or reinstate the requirement to develop a Master Plan for the Blackwattle Bay area.

In my submission, the NSW Government must create a Master Plan for Blackwattle Bay without the problems identified above.

Yours faithfully,

Tamira Stevensen

9 August 2021

172276

Stevensen

Glebe 2027

See letter uploaded dated 9 August 2021.

TO: Department of Planning, Industry and Environment
Blackwattle Bay redevelopment submission
Locked Bag 5022 Parramatta NSW 2124

FROM: Tamira Stevensen
PO Box 243 Annandale NSW 2038
E: tamira.stevensen@gmail.com

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Yours faithfully,

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9 August 2021

181551

Stewart

Glebe

To Planning, Infrastructure and Environment,

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

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

High-density housing development will overshadow 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.

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 canâ€™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.

I raised this point at an online consultation last year, and it's disappointing to see the low target that has been set.

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 â€“ 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 wonâ€™t look anything like the existing naturalised Glebe Foreshore which is characterised by parks â€“ Jubilee, Federal, Blackwattle Bay and Bicentennial.

This narrow walkway will pit pedestrians, bike riders, runners etc against each other for space.

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 NSWâ€™s application and ensure that the City of Sydney becomes the consent authority.

Yours Sincerely

Debra Stewart

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Debra Stewart

182376

Tayama

2009

To Whom it may concern,

Department of Planning, Industry and Environment

Blackwattle Bay redevelopment submission

As the owner of Bayview apartment 49/120 Saunders St, Pyrmont NSW 2009 we had received notification of the development plans submitted for Blackwattle Bay redevelopment along with the technical documents as plans on display. The current plans call for significant mixed-use development along Bank street with towers close to 18 stories and adjacent buildings even higher.

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:

- 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.

- 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.

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:

- o a) assessment done for 120 Saunders Street now to ensure the current noise pollution as per the standards incorporated into the development
- o b) ensure take the above assessment into account when factoring the building heights of the proposed construction
- o c) provide noise & vibration reduction for current & future residents by putting large glass panels along the Anzac bridge to deflect the noise
- o d) 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.

Looking forward to a favourable and considerate response.

Yours faithfully,

Kazuko Tayama & Steve Gannon

49/120 Saunders Street

pyrmont

GLOBAL COMMENTS

1. Greater Sydney Commission and Planning Excellence

In one of the documents that I read when reviewing the Blackwattle Bay State Significant Precinct Study, I noted the concerns that the Greater Sydney Commission's concerns about the complexity of planning in the Blackwattle Bay area.

No-one can deny the amount of planning studies that the Pyrmont Peninsula has been subjected to. Unfortunately, I cannot believe that this most recent study would assuage the Commission's concerns. This study is perhaps the most repetitious, poorly structured/written, and hard to read document that I have had the displeasure of reading. Rather than a true planning study it is more of list of acronyms, tables and references to other studies and planning documents and what they require rather than advancing planning for the site and Pyrmont Peninsula and garnering support.

It also occurs to me that the report was developed to accord with the principles of the Yes Minister/Prime Minister TV series:

1. Get Rid of the Problem in the Title

- this Study is not about Blackwattle Bay but less than 50% of it

: only the portion you WANT to include in the Study

2. Is it the right weight? The report is

- poorly structured, the report hides important comment deep in the document.

- unbelievably repetitive and more a list of requirements from other documents and statements about "that" it responds rather than actually responding.

- filled with numerous figures missing codes and which should have been amalgamated

- missing all the documents frequently referred to as attachments, the contents of which should have been discussed properly in the report.

Having struggled through the report I am left with the impression that the report is intended to bore and confuse the reader to limit legitimate and reasoned response.

The number of times that the document refers to the need for future studies and decisions clearly makes it an inadequate report on which to move forward.

The report also repeatedly refers to the need for planning excellence. I have difficulty in accepting that this report represents "excellence" in any form>. Just saying the words does not make it so.

2. The Precinct and Place-Based Planning

All sites or precincts exist within something of a higher order. As I commented in my submission on the new Sydney Fish market, that study sought to avoid significant issues by limiting the extent of the geographic space under consideration and sidelining the impact of that area on the surrounding. While this study report refers to the surrounding areas its treatment of them is inadequate and seems to adopt a "not our responsibility" and "somebody will look at that later" approach. How can that be planning excellence if a site is planned before its impacts on the surrounding area is known. For example, it takes 148 pages to acknowledge that further study of utilities such as water, sewerage, electricity and gas in the Pyrmont Peninsula is required and 154 pages to acknowledge that a Pyrmont Infrastructure Study is required yet seeks to develop the Blackwattle Bay Precinct as narrowly defined in advance. It is unsurprising that the Pyrmont community is not supportive and lacks confidence.

Rather, the Blackwattle Bay study, is myopic and essentially deals with the old Fish market site and the Bank Street foreshore - although that part of the site is primarily dependant on "future" decisions. Is this really good enough for s site of such significance and reflective of panning excellence?

My other general comments on the site are that it:

" Fails to address the gateway to the Bay - Glebe Island Bridge. This heritage item is too important to be largely ignored in a plan for Blackwattle Bay. Surely it cannot be planning excellence to deliberately ignore/defer this important but decaying heritage item to future decisions. Then, suddenly at p 134 there is an alarming statement slipped in that talks about "construction of a "new crossing" between Glebe Island and Pyrmont that "could support walking cycling and public transport". What does this mean for the existing and much-loved Glebe Island Bridge and, if this structure or a new one is recommended it would totally change the need to funnel cycling and public transport through Pyrmont as the harbour foreshore would be a far more logical and acceptable route. This needs to be decided before the Blackwattle Bay infrastructure is constructed.

" Fails to properly deal with the roads and traffic issues that border the site. Decisions on major roads bounding the site need to be agreed before planning for the site is finalised.

" Fails to deal adequately deal with utilities infrastructure (water, sewerage, gas and electricity capacities) are properly assessed and, where necessary upgraded. Having only recently recovered from the disruption caused by the Darling Harbour redevelopment, residents of Pyrmont are rightfully concerned about future severe disruption while not only building works at Blackwattle Bay are undertaken but also a major upgrade of water and sewerage from the southern end of the Peninsula are upgraded/replaced.

" Treats surrounding areas of Pyrmont, Ultimo and Glebe differently with Pyrmont being the big loser when it comes to issues such and noise and solar impacts and the impacts being hidden and only fleetingly discussed in the latter parts of Study.

" Conflicts with previous studies such as the Pyrmont Peninsula and transport studies (the latter talking about closing and narrowing roads in Pyrmont and this study speaking about opening and widening them.

" Defines out the western foreshore of the Bay just as it does the bordering roads. I note the consultation with the Sydney College (owned and controlled by the State Government but if I was a resident of Glebe, I would fear that "Glebe is next".

" Caves-in the commercial interests to the north of the current Fish market site including, but especially the Hymix site which is simply not congruent with the aims of the Study. Anyone who currently lives in the Miller Street area would be aware just how much concrete dust this facility spreads over the neighbouring areas. Its 24-hour operation also creates a lot of noise from trucks at night as well as its trucks being one of the major transport problems in the locality. Just because Hymix say its facility is essential does not mean it is so - it probably isn't. It must go before the old Fish market site is redeveloped. Even the study indicates the problems it will create for the site let alone the surrounding areas.

All "private land-used, if advised now should have plenty of time to relocate before the mid 2020s and the sites then compulsorily resumed as they are inconsistent with not only the site but surrounding residential areas.

3. The World has Changed Irrevocably - Catch Up!

While I note the numerous planning studied that have been conducted in the past and their predictions of housing, commercial space, and employment needs, are used, COVID has rendered these studies out of date.

Working from home is now a fact of life and it is highly unlikely former "office-based" will return. Work will return to anything like previous levels. Health Directions also inhibit the number of workers who can occupy any space and the demand for apartment living weakened. We will not be going back to previous models and your demands should be revised to reflect this and recognise the excess of space that now exists in the CBD. There are already predictions of a glut of office space in the CBD and retail shops there are in desperate need of additional city workers. Building office space in Blackwattle Bay will only exacerbate that problem and should be reconsidered. It is highly likely that a lot of the "Innovation Corridor" requirements can be satisfied without Blackwattle Bay.

Similarly, apartment and inner-city living has lost a lot of its attraction as working from both home and moving to regional areas has been both feasible and desirable. Your arguments about "affordable housing are also badly diminished by your acknowledgement that only 1.7% of the residential floorspace on the site will be for that purpose (as opposed to 5-10% across Greater Sydney), your failure to identify where that will be and your arguments that it should not be mixed with medium and high-end housing. Essentially, therefore you are proposing a waterfront development for the rich.

4. Impact on Pyrmont

Throughout your report you downplay the impact of your proposals on the existing community of Pyrmont. Glebe and Ultimo feature far more prominently in your report than does Pyrmont and your proposals frequently conflict with previous studies. Ultimately, buried deep in the document, you admit that further work is required to properly understand the impact of the proposals on Pyrmont - a clear indication that the site area is considered mor important that the remainder of the suburb.

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55 SLEP Heights Figure 24 is intentionally confusing in that the heights indicated do not indicate whether they are metres of floors.

62-64 Reconnecting The Bay To Its Surrounds The naming of the street and lanes (e.g. Gipps) is not explained as to its connection with Pyrmont.

Further, the extension of streets such as Miller and Saunders seem to have far more to with movement through the site than connecting the neighbouring areas of Pyrmont. In fact, connecting Miller and Saunders Streets to the foreshore are likely to increase difficulties for the residents of those streets.

The recently installed cycleway in Miller Street is a failure (most cyclists use the newly narrowed roadway instead of the cycleway) and hated by many residents because of the problems it has created.

64 Community Consultation As evidence by the statements in the Study, the community consultation has not been with residents but with bodies that might be expected to support development proposals - it is "fake" consultation

71 Hymix I view the comments here as an ambit defensive position by Hymix that could not be reasonably sustained. The Hanson's plant was removed for the new Fish market and despite pressure by Hanson's it was not relocated to Glebe Island. Pressure by Hymix to remain should be similarly refuted.

73 Building Heights While a majority of people may have opted for Scenario 2 that does not mean that we like it. It is akin to being asked how you want to be executed - being electrocuted, being hot or having your head removed.

None of the three scenarios are acceptable to most Pyrmont residents that I have spoken to who all believe that the heights of the buildings are excessive and that they will result in significant afternoon shadowing for significant parts of Pyrmont village.

The study deals with avoiding morning shadowing of Glebe and Wentworth Park but remains silent when it comes to Pyrmont.

If ever The Star Tower is built, we could be in shadow in both the morning and afternoon especially in winter.

75 First Nations Culture Is this it? Is this all you could come up with despite First Nations supposedly being a significant component of your philosophy?

81 Roads The current Gipps Street Pyrmont terminates on the Eastern side of Harris Street Pyrmont and there appears no intention to extend it to the current Fish market site. Why then are streets in project area being called Gipps Street and Gipps Street and Gipps Lane - just as the bisected Jones Street does. Also why is the nomenclature European and not based on Aboriginal words?

I also strongly oppose any road system on the site than promotes vehicles from the site moving through or seeking parking in the residential streets of the remainder of Pyrmont.

85 Proposed Road Hierarchy Figure 33 shows Miller Street as a 'Major Road". This is both unreasonable and unacceptable to Miller Street residents. Our street has always been a busy and heavily used road and is often a bottleneck in the weekday afternoon. The recent addition of the cycleway has reduced its carrying capacity and increased the danger for accidents between bicycle and vehicular traffic. It does not have the capacity to carry additional traffic generated by the proposed Blackwattle Bay development. Through traffic should instead be funnelled onto the largely not residential Pyrmont Bridge Road.

86 Development sensitive to adjacent development. This is not correct. Your report concentrates on open space and sun planes for Glebe Foreshore, Sydney Secondary College and Wentworth Park. It totally ignores afternoon sun planes for Pyrmont Village which will be completely overshadowed in the afternoon. This is unacceptable.

For the study to justify building heights on mirroring those on Distillery Hill is also laughable. Those building are constructed on a far higher elevation, and far less floor and create far less afternoon shadowing than will those proposed for Blackwattle Bay.

As well as shadowing the existing residential areas of Pyrmont Village the proposed building will also cause a loss of both views and privacy for existing dwellings.

Yet again I must object to the myopic views expressed in the report about the need for appropriate sun-planes on site but total disregard for the sun-planes of Pyrmont Village.

88 138,000sqm employment floor space As stated elsewhere, I do not accept that this minimum can be justified in the posit COVID environment especially when there is so much concern for excess floor space in the nearby CBD.

93 Maximum Building Heights The proposed maximum heights will ensure that appropriate solar access protection is afforded to existing and new open spaces.

This is another clear example of how myopic the authors are. Your concern is for the site and totally ignore the impact of your proposals on Pyrmont Village.

How can this possibly be "planning excellence"?

94 Affordable Housing Your admission that only 1.7% of residential space in the development will be for affordable housing compared with 5-10% across Greater Sydney makes a mockery of the other statements in the Study proudly espousing a mix of housing types. This is further evidenced by the fact that you argue for sperate buildings for affordable housing but do not indicate where that will be. No doubt you are intending that they be in the area of the Western Distributor that you have already stated will suffer noise issues.

110-112 DCP 2012 requirements and the shadowing overlay map on p 111 clearly demonstrate the callous disregard that this Study shows for Pyrmont and its residents. The study constantly looks West and never East unless it is to solve an on-site problem.

119-120 Indicative Staging Plan This Plan is extremely disappointing and will compromise the success of any development on the Fish market site for many years. It is a sell-out to commercial interests and clearly indicates that the Study is all about getting maximum economic benefit out of the current Fish market site and that anything else is peripheral and of little, no interest.

122 Promenade Width Again, choice of Option 3 promenade width demonstrates:

1.the desire to squeeze as much money as possible out of the site and forsaking public open space for extra building space.

2. Caving into the commercial interests in Development Zone 8

125 Figure 55 Ignores the Light Rail Stop at John Street Square which would be an important access link for the northern p[at of the site.

126 Glebe Island Bridge The statements at p126 are cursory and do not satisfy the requirement of SR3.6 to identify "how" the plan connects to the former Glebe Island Bridge as a possible future active transport connection to the Bays. Planning access to and through the site and ignore the significant opportunities offered by a future transport link that could significantly alter the situation cannot be "planning excellence".

133 SR4.13 Noise & Acoustic Compatibility Your Study shows that the Hymix facility is not compatible with the proposed land uses - even ignoring the dust that Hymix creates yet the building planning studies show that proposed buildings are intended to be constructed so as to minimise the problem. Surely this is not acceptable. The Hymix site is a problem already for existing local residents from noise, dust and transport perspectives and will become even more of an issue when the current Fish market site is redeveloped.

Hymix's assertions that the facility is essential need to be seriously tested. I do not believe them. Hanson's relocated to allow the new Fish market and construction in Sydney survived. The same would happen if the Hymix facility was forced elsewhere.

To Whom it may concern,
Department of Planning, Industry and Environment
Blackwattle Bay redevelopment submission

As the owner of Bayview apartment 49/120 Saunders St, Pyrmont NSW 2009 we had received notification of the development plans submitted for Blackwattle Bay redevelopment along with the technical documents as plans on display. The current plans call for significant mixed-use development along Bank street with towers close to 18 stories and adjacent buildings even higher.

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:
- 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.
- 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.

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:

- a) assessment done for 120 Saunders Street now to ensure the current noise pollution as per the standards incorporated into the development
- b) ensure take the above assessment into account when factoring the building heights of the proposed construction
- c) provide noise & vibration reduction for current & future residents by putting large glass panels along the Anzac bridge to deflect the noise
- d) 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.

Looking forward to a favourable and considerate response.

Yours faithfully,

Kazuko Tayama & Steve Gannon
49/120 Saunders Street
pyrmont

GLOBAL COMMENTS

1. Greater Sydney Commission and Planning Excellence

In one of the documents that I read when reviewing the *Blackwattle Bay State Significant Precinct Study,* I noted the concerns that the Greater Sydney Commission's concerns about the complexity of planning in the Blackwattle Bay area.

No-one can deny the amount of planning studies that the Pyrmont Peninsula has been subjected to. Unfortunately, I cannot believe that this most recent study would assuage the Commission's concerns. This study is perhaps the most repetitious, poorly structured/written, and hard to read document that I have had the displeasure of reading. Rather than a true planning study it is more of list of acronyms, tables and references to other studies and planning documents and what they require rather than advancing planning for the site and Pyrmont Peninsula and garnering support.

It also occurs to me that the report was developed to accord with the principles of the Yes Minister/Prime Minister TV series:

1. Get Rid of the Problem in the Title
   - this Study is not about Blackwattle Bay but less than 50% of it
     : only the portion you WANT to include in the Study

2. Is it the right weight? The report is
   - poorly structured, the report hides important comment deep in the document.
   - unbelievably repetitive and more a list of requirements from other documents and statements about "that" it responds rather than actually responding.
   - filled with numerous figures missing codes and which should have been amalgamated
   - missing all the documents frequently referred to as attachments, the contents of which should have been discussed properly in the report.

Having struggled through the report I am left with the impression that the report is intended to bore and confuse the reader to limit legitimate and reasoned response.

The number of times that the document refers to the need for future studies and decisions clearly makes it an inadequate report on which to move forward.

The report also repeatedly refers to the need for planning excellence. I have difficulty in accepting that this report represents "excellence" in any form>. Just saying the words does not make it so.

2. The Precinct and Place-Based Planning

All sites or precincts exist within something of a higher order. As I commented in my submission on the new Sydney Fish market, that study sought to avoid significant issues by limiting the extent of the geographic space under consideration and sidelining the impact of that area on the surrounding. While this study report refers to the surrounding areas its treatment of them is inadequate and seems to adopt a "not our responsibility" and "somebody will look at that later" approach. How can that be planning excellence if a site is planned before its impacts on the surrounding area is known. For example, it takes 148 pages to acknowledge that further study of utilities such as water, sewerage, electricity and gas in the Pyrmont Peninsula is required and 154 pages to acknowledge that a Pyrmont Infrastructure Study is required yet seeks to develop the Blackwattle Bay Precinct as narrowly defined in advance. It is unsurprising that the Pyrmont community is not supportive and lacks confidence.

Rather, the Blackwattle Bay study, is myopic and essentially deals with the old Fish market site and the Bank Street foreshore – although that part of the site is primarily dependant on "future" decisions. Is this really good enough for s site of such significance and reflective of panning excellence?

My other general comments on the site are that it:

- F***ails to address the gateway to the Bay – Glebe Island Bridge.*** This heritage item is too important to be largely ignored in a plan for Blackwattle Bay. Surely it cannot be planning excellence to deliberately ignore/defer this important but decaying heritage item to future decisions. Then, suddenly at p 134 there is an alarming statement slipped in that talks about "construction of a "new crossing" between Glebe Island and Pyrmont that "could support walking cycling and public transport". What does this mean for the existing and much-loved Glebe Island Bridge and, if this structure or a new one is recommended it would totally change the need to funnel cycling and public transport through Pyrmont as the harbour foreshore would be a far more logical and acceptable route. This needs to be decided before the Blackwattle Bay infrastructure is constructed.

- Fails to properly deal with the roads and traffic issues that border the site. Decisions on major roads bounding the site need to be agreed before planning for the site is finalised.

- Fails to deal adequately deal with utilities infrastructure (water, sewerage, gas and electricity capacities) are properly assessed and, where necessary upgraded. Having only recently recovered from the disruption caused by the Darling Harbour redevelopment, residents of Pyrmont are rightfully concerned about future severe disruption while not only building works at Blackwattle Bay are undertaken but also a major upgrade of water and sewerage from the southern end of the Peninsula are upgraded/replaced.

- Treats surrounding areas of Pyrmont, Ultimo and Glebe differently with Pyrmont being the big loser when it comes to issues such and noise and solar impacts and the impacts being hidden and only fleetingly discussed in the latter parts of Study.

- Conflicts with previous studies such as the Pyrmont Peninsula and transport studies (the latter talking about closing and narrowing roads in Pyrmont and this study speaking about opening and widening them.

- Defines out the western foreshore of the Bay just as it does the bordering roads. I note the consultation with the Sydney College (owned and controlled by the State Government but if I was a resident of Glebe, I would fear that "Glebe is next".

- Caves-in the commercial interests to the north of the current Fish market site including, but especially the Hymix site which is simply not congruent with the aims of the Study. Anyone who currently lives in the Miller Street area would be aware just how much concrete dust this facility spreads over the neighbouring areas. Its 24-hour operation also creates a lot of noise from trucks at night as well as its trucks being one of the major transport problems in the locality. Just because Hymix say its facility is essential does not mean it is so – it probably isn't. It must go before the old Fish market site is redeveloped. Even the study indicates the problems it will create for the site let alone the surrounding areas.

  All "private land-used, if advised now should have plenty of time to relocate before the mid 2020s and the sites then compulsorily resumed as they are inconsistent with not only the site but surrounding residential areas.

3. The World has Changed Irrevocably – Catch Up!

While I note the numerous planning studied that have been conducted in the past and their predictions of housing, commercial space, and employment needs, are used, COVID has rendered these studies out of date.

Working from home is now a fact of life and it is highly unlikely former "office-based" will return. Work will return to anything like previous levels. Health Directions also inhibit the number of workers who can occupy any space and the demand for apartment living weakened. We will not be going back to previous models and your demands should be revised to reflect this and recognise the excess of space that now exists in the CBD. There are already predictions of a glut of office space in the CBD and retail shops there are in desperate need of additional city workers. Building office space in Blackwattle Bay will only exacerbate that problem and

should be reconsidered. It is highly likely that a lot of the "Innovation Corridor" requirements can be satisfied without Blackwattle Bay.

Similarly, apartment and inner-city living has lost a lot of its attraction as working from both home and moving to regional areas has been both feasible and desirable. Your arguments about "affordable housing are also badly diminished by your acknowledgement that only 1.7% of the residential floorspace on the site will be for that purpose (as opposed to 5-10% across Greater Sydney), your failure to identify where that will be and your arguments that it should not be mixed with medium and high-end housing. Essentially, therefore you are proposing a waterfront development for the rich.

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54	Minister may waive requirement for a master plan	If the Blackwattle Bay site is as significant as claimed, how can it be argued that development of a Master Plan is unwarranted. Doing this is tantamount to stifling legitimate and important debate and should be strongly criticised.
55	SLEP Heights	Figure 24 is intentionally confusing in that the heights indicated do not indicate whether they are metres of floors.
62-64	Reconnecting The Bay To Its Surrounds	The naming of the street and lanes (e.g. Gipps) is not explained as to its connection with Pyrmont.

		Further, the extension of streets such as Miller and Saunders seem to have far more to with movement through the site than connecting the neighbouring areas of Pyrmont. In fact, connecting Miller and Saunders Streets to the foreshore are likely to increase difficulties for the residents of those streets. The recently installed cycleway in Miller Street is a failure (most cyclists use the newly narrowed roadway instead of the cycleway) and hated by many residents because of the problems it has created.
64	Community Consultation	As evidence by the statements in the Study, the community consultation has not been with residents but with bodies that might be expected to support development proposals – it is "fake" consultation
71	Hymix	I view the comments here as an ambit defensive position by Hymix that could not be reasonably sustained. The Hanson's plant was removed for the new Fish market and despite pressure by Hanson's it was not relocated to Glebe Island. Pressure by Hymix to remain should be similarly refuted.
73	Building Heights	While a majority of people may have opted for Scenario 2 that does not mean that we like it. It is akin to being asked how you want to be executed – being electrocuted, being hot or having your head removed. None of the three scenarios are acceptable to most Pyrmont residents that I have spoken to who all believe that the heights of the buildings are excessive and that they will result in significant afternoon shadowing for significant parts of Pyrmont village. The study deals with avoiding morning shadowing of Glebe and Wentworth Park but remains silent when it comes to Pyrmont. If ever The Star Tower is built, we could be in shadow in both the morning and afternoon especially in winter.
75	First Nations Culture	Is this it? Is this all you could come up with despite First Nations supposedly being a significant component of your philosophy?
81	Roads	The current Gipps Street Pyrmont terminates on the Eastern side of Harris Street Pyrmont and there appears no intention to extend it to the current Fish market site. Why then are streets in project area being called Gipps Street and Gipps Street and Gipps Lane – just as the bisected Jones Street does. Also why is the nomenclature European and not based on Aboriginal words? I also strongly oppose any road system on the site than promotes vehicles from the site moving through or seeking parking in the residential streets of the remainder of Pyrmont.
85	Proposed Road Hierarchy	Figure 33 shows Miller Street as a 'Major Road". This is both unreasonable and unacceptable to Miller Street residents. Our street has always been a busy and heavily used road and is often a bottleneck in the weekday afternoon. The recent addition of the cycleway has reduced its carrying capacity and increased the danger for accidents between bicycle and vehicular traffic. It does not have the capacity to carry additional traffic generated by the proposed Blackwattle Bay development. Through traffic should instead be funnelled onto the largely not residential Pyrmont Bridge Road.
86	Development sensitive to adjacent development.	This is not correct. Your report concentrates on open space and sun planes for Glebe Foreshore, Sydney Secondary College and Wentworth Park. It totally ignores afternoon sun planes for Pyrmont Village which will be completely overshadowed in the afternoon. This is unacceptable. For the study to justify building heights on mirroring those on Distillery Hill is also laughable. Those building are constructed on a far higher elevation, and far less floor and create far less afternoon shadowing than will those proposed for Blackwattle Bay.

		As well as shadowing the existing residential areas of Pyrmont Village the proposed building will also cause a loss of both views and privacy for existing dwellings. Yet again I must object to the myopic views expressed in the report about the need for appropriate sun-planes on site but total disregard for the sun-planes of Pyrmont Village.
88	138,000sqm employment floor space	As stated elsewhere, I do not accept that this minimum can be justified in the posit COVID environment especially when there is so much concern for excess floor space in the nearby CBD.
93	Maximum Building Heights	*The proposed maximum heights will ensure that appropriate solar access protection is afforded to existing and new open spaces*. This is another clear example of how myopic the authors are. Your concern is for the site and totally ignore the impact of your proposals on Pyrmont Village. How can this possibly be "planning excellence"?
94	Affordable Housing	Your admission that only 1.7% of residential space in the development will be for affordable housing compared with 5-10% across Greater Sydney makes a mockery of the other statements in the Study proudly espousing a mix of housing types. This is further evidenced by the fact that you argue for sperate buildings for affordable housing but do not indicate where that will be. No doubt you are intending that they be in the area of the Western Distributor that you have already stated will suffer noise issues.
110-112		DCP 2012 requirements and the shadowing overlay map on p 111 clearly demonstrate the callous disregard that this Study shows for Pyrmont and its residents. The study constantly looks West and never East unless it is to solve an on-site problem.
119-120	Indicative Staging Plan	This Plan is extremely disappointing and will compromise the success of any development on the Fish market site for many years. It is a sell-out to commercial interests and clearly indicates that the Study is all about getting maximum economic benefit out of the current Fish market site and that anything else is peripheral and of little, no interest.
122	Promenade Width	Again, choice of Option 3 promenade width demonstrates: 1.the desire to squeeze as much money as possible out of the site and forsaking public open space for extra building space. 2. Caving into the commercial interests in Development Zone 8
125	Figure 55	Ignores the Light Rail Stop at John Street Square which would be an important access link for the northern p[at of the site.
126	Glebe Island Bridge	The statements at p126 are cursory and do not satisfy the requirement of SR3.6 to identify "how" the plan connects to the former Glebe Island Bridge as a possible future active transport connection to the Bays. Planning access to and through the site and ignore the significant opportunities offered by a future transport link that could significantly alter the situation cannot be "planning excellence".
133	SR4.13 Noise & Acoustic Compatibility	Your Study shows that the Hymix facility is not compatible with the proposed land uses – even ignoring the dust that Hymix creates yet the building planning studies show that proposed buildings are intended to be constructed so as to minimise the problem. Surely this is not acceptable. The Hymix site is a problem already for existing local residents from noise, dust and transport perspectives and will become even more of an issue when the current Fish market site is redeveloped. Hymix's assertions that the facility is essential need to be seriously tested. I do not believe them. Hanson's relocated to allow the new Fish market and construction in Sydney survived. The same would happen if the Hymix facility was forced elsewhere.

174996

Tunnicliffe

Pyrmont NSW 2009

I have uploaded my Blackwattle Bay Submission as a .pdf file with this form. (I sumitted a form yesterday but the file did not seem to upload, please ignore that one.)

Could you please confirm that you have received this submission and file.

Regards,

Adrienne Tunnicliffe

Blackwattle Bay/Tjerruing
State Significant Precinct Study

Submission to Infrastructure NSW

Adrienne & Keth Tunnicliffe
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We pay our respect to the traditional custodians of the land and waters of Tjerruing – the Wangal and the Gadigal people.

In 1909 there was a Royal Commission into Sydney's improvement, Australia's first major town planning inquiry. The commissioners wrote;

"The charm of Sydney lies in its harbour and the picturesque heights surrounding it. To hand them over to the uncontrolled vagaries of the speculative builder would be deplorable."

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3. The development of Area Two owned by private landowners
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The framework will also provide for new public open space including a foreshore promenade, community facilities, and other compatible uses."

The current proposal does not meet the broad objectives of this stated requirement. There is no way that high commercial and residential towers can be considered a 'compatible use'.

The SSP Study Requirements (SSP Study Attachment2) identify a series of key principles which should guide the study. The Study should demonstrate how these principles have been addressed. One of these is:

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Following the declaration of The Bays Precinct as an SSP in 2016, a public consultation program was undertaken with the community and stakeholders during July-August 2017 on the vision, values, principles and objectives for Blackwattle Bay as part of the first phase of master planning.

This consultation was designed to shape the design principles of the Blackwattle Bay Precinct Plan through a series of engagement activities including public workshops, online survey and submission processes.

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The three scenarios presented in 2020 bear very little relevance to the results of this consultation and do not reflect the views put forward by the respondents and stakeholders. Their wishes have, in some important aspects been ignored.

The building forms presented in the three scenarios were largely the same, dominated by towers up to 45 stories above podiums. This concept has never been shared or explored during any consultation.

There was no provision for stakeholders to select 'none of the above'!

Feedback

Results of the feedback on the Draft Masterplan Principles show that of the twenty Draft Masterplan Principles ranked in order of importance by those consulted, "No 12 *Integrate housing and mixed uses suitable to living on the city's edge"*, comes in last at number twenty! (p10).

"Principle 15 Mandate Design Excellence in Public Domain, landscape and built form design " is ranked second with 92% regarding this principle as either very important, important or somewhat important.

Participants commented that:

'*the design of new buildings should consider the site in context. Specifically, the height and scale of the built form should reflect the waterfront nature of the precinct and traditional low-rise architecture and heritage character of surrounding localities including Glebe'* (Masterplanning the Bays Market District – Draft Masterplan Principles Consultation Report p12).

The top three words used by participants to describe their future vision for the Bays Market Area were **accessibility, open space** and **community**.

The NSW Government has no mandate for the proposed density, scale and height proposed in the BBSSP Study.

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***"If** residential development is proposed, ensure a range of housing choices, including Affordable Housing, is provided and the health and amenity of residents is protected."*

The height and density of the proposed residential towers and the paucity of open green space surrounding them does not do this.

The density proposed in the SSP Study, will result in a wall of buildings close to the foreshore, including towers up to 45 stories high. This occurs nowhere else in Sydney, other than the central CBD. And they are being proposed in what is already a highly populated residential area. The only existing towers are those on Distillery Hill which are less than half this high and have much more open public space and amenity around them.

The technical studies attached to the SSP Study clearly show the impact of this wall of buildings to the precinct itself and the surrounding areas will be overshadowing, destruction of local views, dangerous wind tunnels, increased traffic noise (especially in the area on the north east side of Bank St), lack of

easy access to the foreshore and a minimal 30% of open space which includes all hard and soft surfaces.

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The lack of space for social gathering within buildings places greater emphasis on creating a public space environment that enables local residents to engage with each other. (Technical Study Health Impacts Assessment (HIA)

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Technical Study Health Impacts Study (HIA)

The SSP Study Attachment 3.2 Urban Design Statement Vol 2 states:

"Stage 5 (the construction of the low rise building 05 in Area Three) is a relatively low rise feature building however its place in the draft Precinct Plan is important as it provides a buffer to the public domain and remaining lots from the Hymix site."

The SSP Study (p89 Fig 37) proposes this building, next to the Hymix site (and dangerous pollution), for Community Library, theatre and Childcare!

Area Two is NOT a suitable site to develop residential towers.

The SSP Study Proposes - 5 x 4 storey podium blocks - 4 x towers (14-20 storeys above 4 storey podium) - 7m wide colonnade along promenade - 3 Arcade links to Bank Street.

The colonnade is placed under the overhang of the podium buildings and the arcade links have been identified as areas producing uncomfortable and dangerous wind levels resulting in wind tunnels.

These towers and the scope and scale of the podium buildings underneath them are a gross overdevelopment of this thin strip of land.

The residential towers would have to have sealed windows on the side facing the Western Distributor and the SSP Study (p133) diagram clearly shows that traffic noise would bounce off these towers into the buildings on the north east side of Bank St.

Noise monitoring in Bank St adjacent to where the new towers will be situated resulted in the highest readings of any of the test sites. (See Table 2 Project Noise Trigger Levels p.22 Attachment 18: Noise and Vibration Assessment).

This will result in unacceptable noise levels for the people living and working in this area.

PPPS Pyrmont Peninsula Place Strategy (p25) states in Direction 2 – "Development that complements or enhances the area". This Direction refers to the "character and charm of surrounding buildings and public domain" and states that "Any changes in building forms and public domain must be sympathetic to, or enhance, that character".

The SSP Study (p38) in addressing the PPPS 10 Directions, claims that the study outlines built form that is sensitive to the existing neighbourhood context.

This is clearly not true.

There has been no analysis of the impact of these towers on the neighbourhood area bounded by the Distillery Hill escarpment, The Harris St Ridge, and Pyrmont Bridge Rd, (including Bulwara Rd).

In fact, the people living and working in this neighbourhood will find themselves living and working in a hole with a wall of towers blocking any open or district views or light with increased pollution, noise, dangerous and uncomfortable wind tunnels and shadowing.

These towers overshadow key public domain and primary open space and there is no precedence in the Sydney Harbour context of these heights immediately adjacent to the harbour's edge.

Anzac Bridge is heritage listed and the pylons and cabling should remain as a dominant feature in the landscape. Buildings should not be developed within the pylon or cabling area.

The Bays Precinct Transformation Plan - October 2015 (p23) states

"While the Bays Waterfront Promenade will be an essential connector within The Bays Precinct and to surrounding suburbs, it will be more than just a pathway that links people between great places – it will be planned as a new must-see Destination for every visitor to Sydney; a waterfront playground to bring communities together. It will be designed to seamlessly connect the urban coastal and marine context with both green shorelines and living sea walls. A variety of trails will link the Promenade including cultural, recreational and blue waterway trails".

This will clearly not be the case in Area Two where the Promenade is reduced to a ten metre wide footpath. Ten metres is not wide enough to accommodate safely; cyclists, joggers, pedestrians, and parents with strollers. With the increase in active transport likely to be attracted to the foreshore path, the narrow section is likely to be quite hazardous, especially as some of the forms of transport such as powered scooters can travel at speed. This narrow area will also be continuously in shade.

We request our government

- **Ideally, resume this land and turn it into parkland.**
- **Reduce the footprint of the podium buildings in Area Two. This would allow the Promenade to be the full 30 metres suggested and to have greater distance between the developments to ameliorate wind problems and allow greater public access to the shoreline.**
- **To remove unsafe and unhealthy residential development from Area Two.**
- **Abandon the towers.**
- **To maintain the SLEP 2012 zoning for commercial development and not change the zoning to mixed use.**
- **To maintain a safety margin of 60 metres around the perimeter of the Hymix site, not a 60 metre radius from the centre of the site.**

4. The provision of Open Space and Public Domain

Most of the little community and public space that is allocated in this study, is under the ANZAC Bridge in the least amenable and least well-connected corner of the precinct.

Continuing the 30 metre Promenade through Area Two would help connect the Bank Street Open Space to the rest of the precinct and be a valuable addition to the open space and allow for less shadowing and more sunlight in the area.

The Australian Institute of Architects in their submission in June 2020 state:

'Foreshore Reserve must preserve public access of sufficient width for significant tree planting, seating areas etc. A busy public promenade should be a minimum of 30 metres in width to allow a variety of users and activities to coexist without conflict.'

When Barangaroo was developed 50% of open space was mandated. This should be the minimum here too.

The design for the Bank St Park should include as much green and natural open space as possible. The 'Great Idea' for the Bank Street Public Recreation Area included the restoration of Glebe Island Bridge, a harbour swimming pool and two small sandy beach areas. These would be wonderful additions to the area.

We request our government:

- **Ensure a minimum of 50% open space is mandated**
- **Increase the promenade to at least 30 metres width through Area 2 and ideally resume this land for foreshore parkland.**
- **Include the restoration of Glebe Island Bridge into the SSP Study**
- **Redesign the park to include the two sandy beach areas and a harbour swimming pool.**

174991

Tunnicliffe

Pyrmont NSW 2009

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Many thanks,

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Blackwattle Bay/Tjerruing
State Significant Precinct Study

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Technical Study Health Impacts Study (HIA)

The SSP Study Attachment 3.2 Urban Design Statement Vol 2 states:

"Stage 5 (the construction of the low rise building 05 in Area Three) is a relatively low rise feature building however its place in the draft Precinct Plan is important as it provides a buffer to the public domain and remaining lots from the Hymix site."

The SSP Study (p89 Fig 37) proposes this building, next to the Hymix site (and dangerous pollution), for Community Library, theatre and Childcare!

Area Two is NOT a suitable site to develop residential towers.

The SSP Study Proposes - 5 x 4 storey podium blocks - 4 x towers (14-20 storeys above 4 storey podium) - 7m wide colonnade along promenade - 3 Arcade links to Bank Street.

The colonnade is placed under the overhang of the podium buildings and the arcade links have been identified as areas producing uncomfortable and dangerous wind levels resulting in wind tunnels.

These towers and the scope and scale of the podium buildings underneath them are a gross overdevelopment of this thin strip of land.

The residential towers would have to have sealed windows on the side facing the Western Distributor and the SSP Study (p133) diagram clearly shows that traffic noise would bounce off these towers into the buildings on the north east side of Bank St.

Noise monitoring in Bank St adjacent to where the new towers will be situated resulted in the highest readings of any of the test sites. (See Table 2 Project Noise Trigger Levels p.22 Attachment 18: Noise and Vibration Assessment).

This will result in unacceptable noise levels for the people living and working in this area.

PPPS Pyrmont Peninsula Place Strategy (p25) states in Direction 2 – "Development that complements or enhances the area". This Direction refers to the "character and charm of surrounding buildings and public domain" and states that "Any changes in building forms and public domain must be sympathetic to, or enhance, that character".

The SSP Study (p38) in addressing the PPPS 10 Directions, claims that the study outlines built form that is sensitive to the existing neighbourhood context.

This is clearly not true.

There has been no analysis of the impact of these towers on the neighbourhood area bounded by the Distillery Hill escarpment, The Harris St Ridge, and Pyrmont Bridge Rd, (including Bulwara Rd).

In fact, the people living and working in this neighbourhood will find themselves living and working in a hole with a wall of towers blocking any open or district views or light with increased pollution, noise, dangerous and uncomfortable wind tunnels and shadowing.

These towers overshadow key public domain and primary open space and there is no precedence in the Sydney Harbour context of these heights immediately adjacent to the harbour's edge.

Anzac Bridge is heritage listed and the pylons and cabling should remain as a dominant feature in the landscape. Buildings should not be developed within the pylon or cabling area.

The Bays Precinct Transformation Plan - October 2015 (p23) states

"While the Bays Waterfront Promenade will be an essential connector within The Bays Precinct and to surrounding suburbs, it will be more than just a pathway that links people between great places – it will be planned as a new must-see Destination for every visitor to Sydney; a waterfront playground to bring communities together. It will be designed to seamlessly connect the urban coastal and marine context with both green shorelines and living sea walls. A variety of trails will link the Promenade including cultural, recreational and blue waterway trails".

This will clearly not be the case in Area Two where the Promenade is reduced to a ten metre wide footpath. Ten metres is not wide enough to accommodate safely; cyclists, joggers, pedestrians, and parents with strollers. With the increase in active transport likely to be attracted to the foreshore path, the narrow section is likely to be quite hazardous, especially as some of the forms of transport such as powered scooters can travel at speed. This narrow area will also be continuously in shade.

We request our government

- **Ideally, resume this land and turn it into parkland.**
- **Reduce the footprint of the podium buildings in Area Two. This would allow the Promenade to be the full 30 metres suggested and to have greater distance between the developments to ameliorate wind problems and allow greater public access to the shoreline.**
- **To remove unsafe and unhealthy residential development from Area Two.**
- **Abandon the towers.**
- **To maintain the SLEP 2012 zoning for commercial development and not change the zoning to mixed use.**
- **To maintain a safety margin of 60 metres around the perimeter of the Hymix site, not a 60 metre radius from the centre of the site.**

4. The provision of Open Space and Public Domain

Most of the little community and public space that is allocated in this study, is under the ANZAC Bridge in the least amenable and least well-connected corner of the precinct.

Continuing the 30 metre Promenade through Area Two would help connect the Bank Street Open Space to the rest of the precinct and be a valuable addition to the open space and allow for less shadowing and more sunlight in the area.

The Australian Institute of Architects in their submission in June 2020 state:

'Foreshore Reserve must preserve public access of sufficient width for significant tree planting, seating areas etc. A busy public promenade should be a minimum of 30 metres in width to allow a variety of users and activities to coexist without conflict.'

When Barangaroo was developed 50% of open space was mandated. This should be the minimum here too.

The design for the Bank St Park should include as much green and natural open space as possible. The 'Great Idea' for the Bank Street Public Recreation Area included the restoration of Glebe Island Bridge, a harbour swimming pool and two small sandy beach areas. These would be wonderful additions to the area.

We request our government:

- **Ensure a minimum of 50% open space is mandated**
- **Increase the promenade to at least 30 metres width through Area 2 and ideally resume this land for foreshore parkland.**
- **Include the restoration of Glebe Island Bridge into the SSP Study**
- **Redesign the park to include the two sandy beach areas and a harbour swimming pool.**

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Department of Planning, Industry and Environment

Blackwattle Bay Submission,

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Dear Sir/Madam

Re: Blackwattle Bay State Significant Precinct Study.

I am writing to object to the proposed development.

I have lived fewer than 200 metres from Blackwattle Bay for 40 years. When I first moved here, there was little public access to the Bay. Over the decades the Glebe Society has fought to have formerly industrial hand turned into public parks and the foreshore. The resulting benefit to the community cannot be overstated. The foreshore walk is very heavily used, too heavily really for pandemic times.

I walk every day, often twice, by Blackwattle Bay. I love it. My heart sinks every time I imagine the proposed development. It would ruin the Bay.

The Blackwattle Bay State Significant Project Study says development of the current Fish Market site presents â€œan extraordinary opportunity to reconnect the harbour, its surrounding neighbourhoods and the city; to showcase Sydneyâ€™s living culture and stories of Country; to build an inclusive and iconic waterfront destination that celebrates innovation, diversity and community. (page 1)

It borders on the insulting to tell us what is possible, and then present us with this plan that fails every one of those criteria.

The plan prioritises density over every other factor, including the environment and the amenity of the local community.

The land is public land, and the public good must come first, not last.

The proposed foreshore walk, while welcome, falls far short of what is needed. It is too narrow, and it will be overshadowed by the proposed buildings and windy, due to the wind tunnels created between the towers.

The needs of rowers, dragon boaters, canoeists and the other passive water users who have long used the Bay have been overlooked.

This development, and the construction of the new Sydney Fish Markets, are based on pre-Covid 19 pandemic thinking. Tourism from China has collapsed and workers and residents are leaving the CBD. The State Government faces having a ring of new, underutilised buildings around Blackwattle Bay, a Bay that belongs to the people of NSW.

I attended the four webinars on the development. I was appalled to learn the bottom nine storeys of the blocks adjacent to the Western Distributor would be unfit for apartment dwelling, due to noise and air pollution, but could be used for businesses. Who would want to work in such an environment? Only 70 per cent will have adequate solar access, meaning 30 per cent will have inadequate access. Noisy, polluted and dark. Who would want to live or work there?

The buildings are too dense, and the expectation of 1,550 dwellings, 2,800 residents and 5,600 people employed there, would put further, damaging, pressure on an already very densely populated suburb.

The expectation that 80% of transport would not be in cars is totally unrealistic. Just across the Bay, Westconnex is under construction with the promise to deliver even more cars to the area. More public transport would be great. Good luck with lobbying for that, because the Pyrmont people have been asking for better public transport, without success, for a long time.

The adjacent new Sydney Fish Market promises a doubling in visitor numbers in ten years, but without a single extra parking space. Do the developers honestly think people will lug Eskies full of fish home on public transport? Of course not, they will drive there and look for parking in Glebe, an area where few people have off street parking so they will inconvenience residents.

I look forward to the day the Glebe foreshore walk joins up with the Pyrmont walk, instead of having to walk under the gloom and pollution of the Western Distributor.

However, the planned walk is only 10 metres wide in places, and it will be shared between cyclists and pedestrians. It will no doubt be as busy, if not busier, than the Glebe walk. Our experience in Glebe is that shared paths do not work. Pedestrians, particularly those who are elderly, with children or disabled, get frightened by bikes on the path, and cyclists get frustrated by having to negotiate crowded paths. Attempts by the Glebe community to get the City of Sydney council to install cyclist

slowing signs and mechanisms have all failed, and this does not bode well for pedestrians on the proposed path.

The path would also be overshadowed until late in the morning by the towers, and walkers would be buffeted by the wind tunnels that would form between the buildings.

The plan to only make five per cent of the residential supply available as affordable rental housing borders on the scandalous. There is an enormous demand for affordable rental housing in the city. We have never been more reliant on a wide range of service industries, like police, teachers, child care workers, supermarket workers, delivery truck drivers and so on, who need affordable housing. This is public land, and the public should be served by it, with at least 30 per cent available as affordable rentals.

Blackwattle Bay is the prime attraction, but there are too many encroachments on it â€“ including the new Sydney Fish Market â€“ and inadequate consultation with water users.

The Glebe Rowing Club is the third oldest rowing club in Australia, founded in 1879. For over 150 years the local water sports clubs have provided the local community with inclusive and affordable access to the Bay.

Private marinas are only available to a select few, while community sporting and recreation clubs, like rowing, dragon boating, and other individual small water craft are open to the entire community.

But instead of giving the community greater access to the waters of Blackwattle bay, the proposal hands valuable water space to corporate and charter marinas.

Denser communities have a greater need for open space, for opportunities to exercise. But the Plan does not adequately protect the existing community uses of the Bay, let alone provide the capacity to cater for the proposed increased population.

The new Sydney Fish Market will reduce the area of the Bay, and increase water traffic.

The plan will also lead to an increase in marine traffic, including ferries, but there is no plan to manage this safely.

The health of Blackwattle Bay has been overlooked.

As industry has moved out of Blackwattle Bay the water quality has improved. Over 25 fish species and 50 other organisms, including oysters, shrimp, limpets, sponges and algae have been found in the Bay. This has been a wonderful achievement but it is threatened by the development of the new Fish Market and the Blackwattle Bay plan.

Increased numbers and movements of large motor boats and commercial craft have the potential to stir up the sediment, which contains toxic sediments, including the heavy metals mercury, lead, zinc and copper, and other contaminants including asbestos, arsenic, polycyclic aromatic hydrocarbons and total petroleum hydrocarbon. All these have been found in the sediments at levels that exceed

both â€œlow and high trigger value sediment quality guidelines protective of ecological communities.â€ (DA for Stage one of the New Sydney Fish Markets: (E.I.S. 7.10.3 p. 156).)

Marinas need solid, vertical sea walls, but these severely restrict marine ecosystems.

Around in the next Bay, Rozelle Bay, Sydney Water is rehabilitating Johnstons Creek. It is replacing a walled concrete channel with sloping rock beds, walls of differing heights, and creating a range niches to support and encourage a wider variety of marine and botanic life.

Blackwattle Bay once extended into the area now under Wentworth Park, in the form of a mangrove forest. Shane Phillips, from the Tribal Warrior which is moored on the Pyrmont side of Blackwattle Bay, told the gathering at a smoking ceremony for the new Sydney Fish Markets, that the mangrove forest was the fish market in pre-settlement times. This is a critical part of the areaâ€™s First Nations heritage.

Redeveloping the northern bank of Blackwattle Bay offers an unparalleled opportunity to restore the Bay, to provide access to the community, and to alter the sea walls to increase habitat for marine life, but it fails to do this.

Around the Bays.

It should also be noted that there are plans to develop the large swathe of state-government owned land along the adjacent Rozelle, White and Johnstons Bays. While the White Bay plan is in the early stages, the draft strategy includes illustrations of yet more high density buildings.

I fear the Bays could end up ringed with towers, with only Glebeâ€™s heritage standing between Glebe and overdevelopment.

The COVID pandemic has changed how we live and work.

It should also be noted that the plans were all made before the Covid pandemic, which has changed tourism, and the way people live and work in the CBD.

The new $750 million Fish Market was planned on the expectation of visitor numbers doubling in the first ten years. This is largely based on the expectation of increased tourism, particularly from China. That tourism has ceased, and given the current state of the pandemic and relations between Australian and China, is unlikely to resume any time in the near future.

The pandemic and tensions with China have also impacted Chinese investment in real estate and overseas student demand for accommodation.

Since the pandemic, many CBD workers have opted to work from home, and many CBD residents have moved further afield. Vacancy rates for both CBD offices and apartments have soared.

The proposed Blackwattle Bay development, along with the new Fish Market, risks falling victim to the Covid pandemic, adding to the oversupply of vacant residential and office space in the CBD, and financial stress for the developer.

I strongly opposed the development of the new Sydney Fish Market, on the grounds that it would disturb the toxics in the sediment, and block Wentworth Park off the the Bay. This is contrary to government guidelines. The SFM represents a huge over-reach with the increase in retail space, but with no expectation that a single extra fish will be sold. It, together with the proposed marinas, encroaches on our Bay, and reduces habitat for marine organisms.

The proposed plan is fatally flawed because adds insult to injury, aiming to recoup the $750 million cost of the SFM through overdevelopment. The losers will be the residents of Glebe and Pyrmont and ultimately the taxpayers of NSW.

Blackwattle Bay Summary

The site is public land but it does not deliver a public benefit.
It is a massive overdevelopment, too high, too dense. The maximum height of 45 storeys (156m) is taller than the pylons (120m) of Anzac Bridge, and much taller than current Pyrmont/Ultimo height limits (which are..)
The buildings would cast shadows over Blackwattle Bay in the morning (including over the solar panels of the new Sydney Fish Market) and create wind tunnels between the buildings.
The plan does not deliver the foreshore walk we want. It is too narrow, too shadowed and too windy. At 10 m wide it is too narrow to provide for the number of people who will use it because it is proposed to be a shared path (pedestrians and bicycles) which has been shown not to work on the Glebe foreshore walk. It needs to be at least 20 metres wide at its narrowest, preferably 30m.
The site is narrow, and overshadowed by the western distributor, which would create air pollution and noise problems for tenants of the proposed buildings. The lowest nine floors would fall outside government guidelines for apartment air quality and noise levels, so the plan is for the floors to be used for business and retail. Surely this puts the health of the workers in those businesses at risk.
It will not be possible to open windows on the north east side of the building adjacent to and above the western distributor, inhibiting natural ventilation.
The parks proposed are small, narrow and piecemeal, and will be overshadowed for the first half of the day and windy. The City of Sydney (CoS) has produced a map indicating all the places on the proposed plan that are not safe (13) and not comfortable for walking (27). CoS also argues standing and sitting comfort is not considered.
The City of Sydney states the sunlight in the proposed parks is less than the City's requirements, and few, if any streets will have enough sunlight for good tree growth.
The expectation that 80 to 85% of residents will not use private cars is unrealistic, given the limitations on the number of light rail vehicles. And it borders on the bizarre, given the growing presence of Westconnex across the Bay that will deliver huge numbers of cars to the Bay.
Only 5% of the residential is affordable rental housing, (or monetary contribution) but City of Sydney advocates 25% for government owned land, which the Glebe Society supports.
Blackwattle Bay is the prime attraction, but there are too many encroachments on it – including the new Sydney Fish Market – risking the safety of rowers and dragon boaters.
Blackwattle Bay is one boundary of Glebe, and the foreshore walk along the Bay is one of the suburb's great attractions. The proposed plan would cast long shadows over the Bay, the buildings would be visible from much of the suburb, which has a three storey limit. It threatens not only the visual amenity of the suburb, but poses the question, will Glebe be next for overdevelopment?

It should also be noted that there are plans, still in the early stages, for development of the large swathe of state-government owned land along the adjacent Rozelle, White and Johnstons Bays. The Glebe Society fears the Bays could end up ringed with towers, with only our heritage standing between Glebe and overdevelopment.

It should also be noted that the plans were all made before the Covid pandemic, which has changed tourism, and the way people live and work in the CBD.
The new Fish Markets were planned on the expectation of increased tourism, particularly from Chinese tourists, tourism that has ceased, and given the current state of the pandemic and relations between Australian and China, is unlikely to resume any time in the near future.

Since the pandemic, many CBD workers have opted to work from home, and many CBD residents have moved further afield. Vacancy rates for both CBD offices and apartments have never been higher. The proposed Blackwattle Bay development, along with the new Fish Market, could end up fallen victim to the Covid pandemic.

180646

Wahlquist

Glebe

Department of Planning, Industry and Environment

Blackwattle Bay Submission,

Locked Bag 5022,

Parramatta NSW 2124

planning.nsw.gov.au/blackwattle Bay

Dear Sir/Madam

Re: Blackwattle Bay State Significant Precinct Study.

The Glebe Society is committed to protecting and conserving the heritage, environment and community of Glebe. It was founded in 1969 and has over 400 current financial members. One of its proudest achievements is its role in reclaiming the land around the foreshores for the public as industry left the suburb, and the subsequent development of the foreshore walk and parks around Blackwattle and Rozelle Bays. Blackwattle Bay is one of the boundaries of Glebe, and The Glebe Society cherishes the Bay, its history, its natural values and its amenity.

The Glebe Society objects in the strongest possible terms to virtually every detail of this study; to the assumptions, to the â€˜visionâ€™, to the proposed legislative and planning changes, and to the plan itself. The Society also objects to the process recommended in Blackwattle Bay State Significant Project, Statement of Intended Effects.

The Glebe Society believes the development should not be classified as State Significant because it constitutes extremely poor planning. The primary consideration has been density at the expense of other requirements, including important community-supported criteria, some of which are listed in the Appendices.

The land in question is public land, but we believe that not only does it not deliver any public good, the plans, if delivered, would be detrimental to the site, to the precinct, to Blackwattle Bay and to Glebe.

The Glebe Society believes the proposal is a massive overdevelopment of the site, and would bring more residents and workers to the area than could be sustained.

The foreshore walk is far too narrow. It would be overshadowed by the buildings and windy. Paths shared between pedestrians and cyclists do not work.

There is inadequate provision of affordable housing.

The needs of passive water users of Blackwattle Bay, the so called â€œblue spaceâ€ have been overlooked. The plan preferences private marinas over community users and access.

The plan states that 30 per cent of the area is public open space, but much of it is in overshadowed windy areas between tall buildings.

In September 2017, the NSW Government invited community members â€œto engage in the visioning for a future Blackwattle Bayâ€ and to contribute to the writing of a set of Design Principles to guide the preparation of the Precinct Plan. The result was 16 guiding principles.

However, the plan fails to fulfill 11 of its guiding principles, and there is no clear path to fulfilling another two. (Appendix 1).

The plan also fails to meet six of the the nine objectives that apply to consultation with the community and stakeholders. (Appendix 2)

This development, and the construction of the new Sydney Fish Markets, are based on pre-Covid 19 pandemic thinking. Tourism from China has collapsed and workers and residents are leaving the CBD. The State Government faces having a ring of new, underutilised buildings around Blackwattle Bay, a Bay that belongs to the people of NSW.

For Glebe residents, the proposed development would literally overshadow the suburb in the early morning. The buildings would tower over the Bay, destroying the natural amenity of the Bay, and bring increased traffic pressure to our roads that will also have to cope with unacceptable increases in traffic and parking from the new Sydney Fish Markets.

The Glebe Society has fought, and continues to fight, to maintain Glebeâ€™s wonderful built heritage. The proposed development, touted as an extension of the CBD, would place further pressure on Glebe to yield to intrusive, inappropriate and unacceptable developments.

On the Pyrmont side, the Western Distributor is a shadowy chasm separating Pyrmont from Blackwattle Bay. It destroys the legibility of Pyrmont as a peninsula and is a gloomy wasteland redolent of danger which makes the pedestrian experience of walking across Pyrmont to the bay unpleasant.

The views to the west with the harbour in the foreground and beyond Glebe Point, with its interesting topography landscape and architecture, are beautiful and interesting. Great potential exists to open up these vistas. It is a distinguished, indeed, a painterly vista which allows the Distributor with its vertical stanchions and horizontal roadway to be read as a frame enclosing a great and beautiful landscape.

The proposal does not take advantage of these opportunities. Apart from a narrow slot of open space to the bay on the Miller Street axis, the proposal will make the Distributorâ€™s under croft even gloomier by enclosing it with a wall of buildings.

This is not the hallmark of distinguished place making. Blackwattle Bay provides the opportunity to show the world how clever design can ameliorate the impact of traffic engineering on a beautiful place. The scheme fails dismally in this regard.

The document correctly identifies Blackwattle Bay as an extraordinary opportunity to reconnect the harbour, its surrounding neighbourhoods and the city; to showcase Sydneyâ€™s living culture and stories of Country; to build an inclusive and iconic waterfront destination that celebrates innovation, diversity and community. (Blackwattle Bay State Significant Project Study, page 1)

The Plan fails that vision. (Appendix 1)

Consultation.

The Glebe Society has participated over the years in a series of meetings, seminars and planning about the future of the Bays Precinct. The release of the three scenarios, titled â€œRevitalising Blackwattle Bayâ€, which included 45 storey towers in May 2020 was sprung on the community without consultation. The community was shocked by the proposal and overwhelmingly rejected it. The Plan again ignores the results of many consultations, and the wishes and aspirations of the community. The Plan fails six of its nine objectives for community consultation. (Appendix 2)

RECOMMENDATION 1. The Glebe Society requests the Minister for Planning, Industry and Environment order a review of the proposals for Blackwattle Bay, and institutes genuine consultation with the community to produce plans that respect the environment, heritage and architectural scale of Blackwattle Bay.

Lack of a Master Plan.

In March 2010, â€œTowards an Integrated Strategic Plan: Bays Precinctâ€ was presented to Government. It was the result of wide consultation. All master plans for Blackwattle and Rozelle Bays were cancelled when the Coalition Government was elected in 2012. Planning for the Bays passed to Urban Growth, and then Infrastructure NSW (INSW) where it remains.

The Plan is the result of a series of changes to planning legislation. It seeks changes to six State planning controls. (Blackwattle Bay State Significant Precinct Study (BBSSPS) page 96).

These include amending the Sydney Local Environment Plan 2012 to allow a maximum building height of 156, and removing the site from the Sydney Harbour Catchment SREP.

The Plan seeks to remove the requirement to prepare a Development Control Plan when proposed developments increase gross floor area. SREP 26 deals with the protection of views and the scenic quality of foreshores and waterways, but the Plan ignores that, instead producing a concept DA.

RECOMMENDATION 2.

The Glebe Society requests the preparation of a Master Plan as the basis for development. The terms of reference for the Master Plan should include:

. the height, bulk and configuration of the build form must reconnect Blackwattle Bay to Pyrmont

. the foreshore walk must be at least 30 metres wide

. height controls of the existing LEP must be respected

. the impact of the Western Distributor must be minimised through good design

. and the long-standing use of Blackwattle Bay by rowers must be protected by controlling other users.

The Master Plan should be prepared for public exhibition and the City of Sydney should be the consent authority for the development.

The Glebe Society seeks compliance with SREP 26 that would ensure the development would enhance views and the scenic quality of foreshores and waterways.

The Blackwattle Bay State Significant Precinct proposal is a massive overdevelopment.

The proposal is for twelve buildings as follows:

1 x 45 Storey building (156 metres)

1 x 32 storey building (120 metres)

1 x 30 storey building (110 metres)

2 x 25 storey buildings (91.5 metres)

1 x 20 storey building (75.5 metres)

1 x 19 storey building (72 metres)

1 x 17 storey building (65 metres)

2 x 10 storey buildings (37.5 metres)

2 x 5 storey buildings (21 metres)

The tallest buildings, with a maximum height of 45 storeys (156m) are higher than the pylons of Anzac Bridge (120m). They are far higher than the highest buildings on the Pyrmont peninsula. The urban form of Pyrmont should step down to the waterfront but the planning proposal is for a wall of very high buildings along Blackwattle Bay.

The height controls in the current Sydney City Council LEP are well considered and relate to the controls nearby. They provide for a maximum of 33 metres (9 storeys). There is no justification for changing this to a maximum height of 156 metres. Buildings of this height are only found in the CBD. There is no planning or economic justification for having this height on this site.

It should be noted that the background planning documents identify the need for a well-designed fine grain network comprising streets, laneways and arcades which will enhance the accessibility of the waterfront and permeability of the precinct. This is not what is proposed.

The buildings are so tall they would cast shadows over Blackwattle Bay in the morning, including over the solar panels of the new Sydney Fish Market, and create wind tunnels between the buildings.

The buildings are too dense, and the expectation of 1,550 dwellings, 2,800 residents and 5,600 people employed there, would put further, damaging, pressure on an already very densely populated suburb.

The site itself is narrow, and overshadowed by the Western Distributor. This would create air pollution and noise problems for tenants of the proposed buildings. In fact, the lowest nine floors would fall outside government guidelines for apartment air quality and noise levels, so the plan is for those floors to be used for business and retail. Surely this puts the health of the workers in those businesses at risk.

The noise and air pollution from the Western Distributor would also mean it will not be possible to open windows on the north east side of the building adjacent to and above the western distributor, inhibiting natural ventilation. This compromises the vaunted sustainability of the proposal.

Sustainability is further compromised by lack of solar access. The BBSSPS states: â€œSetbacks, building separation, orientation and floor plate layouts across both sites ensure that 70% or more of the apartments in each residential tower are able to achieve a minimum of two hours of sunlight on the 21st of June (winter solstice). (p. 113)

What about the other 30 per cent?

Further, the determination of the Hymix concrete batching plant to remain at its Banks Street site, will mean the proposed residential, office and retail space will be immediately adjacent to a noise industrial site, with frequent truck movements, with the possibility of working 24/7. (BBSSPS page 71)

RECOMMENDATION 3: 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. Buildings should also conform to sustainable building standards.

The plan does not deliver a foreshore walk congruent with the walk along Johnstons Bay and around the Glebe foreshore. It is too narrow, too shadowed and too windy. At 10 metres wide it is too narrow to provide for the number of people who will use it, which would include pedestrians, shoppers and tourists milling about, cyclists, parents pushing strollers, wheelchair users and people walking dogs. If the Glebe foreshore is any indication, the proposed walk will come under heavy pressure.

The new Sydney Fish Markets is expected be a local, national and international tourist attraction. This, along with the completion of the â€˜missing linkâ€™ in the foreshore walk from Woolloomooloo to Rozelle Bay, means it will be used by large numbers of people.

The Glebe Society objects to the path walk being a shared path (shared by both pedestrians and bicycles) which has been shown not to work on the Glebe foreshore walk. It needs to be at least 30 metres wide to accommodate so many different users, and to allow for separate paths for pedestrians and cyclists.

The parks proposed are small, narrow and piecemeal, and will be overshadowed for the first half of the day. They will also be windy, thanks to the proposed buildings creating wind tunnels. The City of Sydney has produced a map indicating 13 places on the proposed plan that are not safe, while 27 are not comfortable for walking. It also argues standing and sitting comfort is not considered.

The City of Sydney states the sunlight in the proposed parks is less than the Cityâ€™s requirements, and few, if any streets will have enough sunlight for good tree growth.

The BBSSPS states that 30 per cent of the site will be open space, but a narrow corridor between two towers, though counted in that percentage, does not fit that description.

The most recent inner city foreshore development, Barangaroo, allocated 50 per cent of the area to open space.

RECOMMENDATION 4: The Glebe Society believes 50 per cent of the area should be open space. The foreshore walk should be 30 metres wide, with separate paths for pedestrians and cyclists. Adequate seating must be provided.

Tree plantings must have adequate sunlight to grow and be protected from damaging winds.

The expectation that 80 to 85% of residents will not use private cars is unrealistic. It also borders on the bizarre, given the growing presence of Westconnex across the Bay that will deliver huge numbers of cars to the Bay. The BBSSPS in fact boasts that the major stages of Westconnex will be completed in 2023, â€œtwo of which [will] deliver road infrastructure to the Baysâ€. So many cars, so little parking.

Plans to improve public transport, including buses, light rail and ferries, to the area would be welcomed â€“ if they actually come into effect. Although the plan expects an increase in light rail services, it is understood the expansion of light rail, which prior to the pandemic was at capacity in peak hour, cannot be expanded due to the power supply, stabling, the single track and Dulwich Hill. (â€œExtra trams to east crowding on Sydneyâ€™s Inner West line still years away.â€ Sydney Morning Herald, July 2, 2019)

We note the new Sydney Fish Market (SFM), while expecting a doubling in visitor numbers over the next ten years, is not providing a single extra car space in the new building. Glebe residents fear our street parking spots will be overtaken by visitors to the SFM, and locals, most of whom do not have private parking spaces, will be disadvantaged. Despite the expectation of the planners, people will still want to own cars and to drive. The shortage of parking spaces will place even more pressure on Glebe.

RECOMMENDATION 5: Reduce the forecast population of residents and workers. Establish new public transport routes, including a ferry service to Blackwattle Bay, and where possible increase existing services.

Only five per cent of the residential supply would be affordable rental housing, or developers can make an equivalent monetary contribution, which can be used elsewhere. This has been the past experience in Pyrmont. There is a huge demand for affordable rental housing in the inner city.

The City of Sydney advocates 25 per cent for government owned land.

RECOMMENDATION 6: That 30 per cent of residents be affordable rental housing, comprising a mixture of one, two and three bedroom apartments. If the developer opts to make an equivalent monetary contribution, that must be invested in local affordable housing.

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The current water users, which include members of the Glebe Rowing Club, the Sydney University Womenâ€™s Rowing Club and the Blackwattle Bay Dragon Boat Club, as well as canoers, kayakers, paddle boarders and sailors, access Blackwattle Bay for sport and recreation every day.

They are particularly concerned about the proposed marinas and increased motorised boat movements expanded on the â€œurban blue spaceâ€ of Blackwattle bay, and the safety of water users.

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Around the Bays.

It should also be noted that there are plans to develop the large swathe of state-government owned land along the adjacent Rozelle, White and Johnstons Bays. While the White Bay plan is in the early stages, the draft strategy includes illustrations of yet more high density buildings.

The Glebe Society fears the Bays could end up ringed with towers, with only our heritage standing between Glebe and overdevelopment.

RECOMMENDATION 9: The plan must take into consideration development around the adjacent bays, and the impact of those plans on the local community and environment.

The COVID pandemic has changed how we live and work.

It should also be noted that the plans were all made before the Covid pandemic, which has changed tourism, and the way people live and work in the CBD.

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The pandemic and tensions with China have also impacted Chinese investment in real estate and overseas student demand for accommodation.

Since the pandemic, many CBD workers have opted to work from home, and many CBD residents have moved further afield. Vacancy rates for both CBD offices and apartments have soared. https://www.smh.com.au/business/companies/office-vacancies-hit-quarter-century-high-but-green-shoots-emerging-20210804-p58fpd.html, https://www.smh.com.au/money/investing/vacancy-rates-still-high-for-inner-city-rentals-20210416-p57jtc.html

The proposed Blackwattle Bay development, along with the new Fish Market, risks falling victim to the Covid pandemic, adding to the oversupply of vacant residential and office space in the CBD, and financial stress for the developer.

RECOMMENDATION 10: INSW should engage independent consultants to put together a report on the projected impact of Covid and tensions with China on longer term demand for housing and commercial space in the area.

Finally, it is our understanding that the massive overdevelopment is intended to recoup the $750 million cost of the new Sydney Fish Markets. The Glebe Society believed it would have been better to rebuild the Fish Market on the current site. The vendors at the Fish Market objected to having the Market rebuilt while they continued trading. We lost that fight, but we do not believe Glebe and Pyrmont should have to pay the price of the recalcitrance of the Market vendors, and the ambitions of the stateâ€™s tourism industry.

RECOMMENDATION 11: The cost of construction of the new Sydney Fish Market should be shared between the State Government and the industries that expect to benefit from it. It should not be earned from the over development of the current Fish Market site.

CONCLUSION.

The Plan asserts that the buildings will be tested by principles of good design. This is fallacious. The building envelopes in the planning process are too dense and too tall.

Good design is about considering all the elements, including impact of the neighbouring buildings, ameliorating the gash of the Western Distributor and managing scale, sunlight, amenity, open space and the foreshore walk.

This proposal is primarily driven by density. The scheme is fatally flawed because it starts with bad design. It is misleading to claim that a bad plan can be rectified by a design code. It cannot.

The Blackwattle Bay State Significant Project, Statement of Intended Effect claims that the overall design of the Blackwattle Bay Precinct Plan delivers a diverse, welcoming and inclusive place, and stays true to the essence of Pyrmont as an eclectic, vibrant and unique neighbourhood. Even in the age of spin it is rare to encounter such a huge disjunction between claims and reality.

APPENDIX 1.

The plan lists 16 guiding principles. BBSSPS page xiii.

How does the proposal stack up against its sixteen guiding principles?

Principle 1: Improve access to Blackwattle Bay, the foreshore and water activities for all users.

It fails.

By cutting off vistas of the Bay instead of opening them up it reduces access. The promenade is not wide enough.

Principle 2: Minimise additional shadowing to Wentworth Park and Glebe Foreshore (in mid-winter) and create new places with comfortable conditions for people to enjoy.

It fails.

The tall buildings proposed will cause overshadowing.

Principle 4: Prioritise movement by walking, cycling and public transport.

It fails.

A priority should be to use clever design to ameliorate the impact of the Western Distributor and enhance the experience of pedestrians walking from the city and Pyrmont.

Principle 6: Link the Blackwattle Bay precinct to the City, Glebe Island and White Bay and other surrounding communities and attractors.

It fails.

The promenade is not wide enough.

Principle 7: Mandate Design Excellence in the public and private domain.

It fails.

The building form is too dense. Starting with bad design is not mandating design excellence.

Principle 8: Integrate housing, employment and mixed uses to create a vibrant, walkable, mixed use precinct on the cityâ€™s edge.

It fails.

More affordable housing is needed. It is not clear from the studies that the commercial uses will be vibrant or viable.

Principle 9: Maintain and enhance water uses and activities.

It fails.

No proper consideration has been given to the continued use of the Bay for rowing. This is threatened by unplanned introduction of other uses. The Bay houses Sydneyâ€™s third oldest rowing club. There is a living heritage of rowing on Blackwattle Bay stretching back almost 150 years. This must be respected.

Principle 11: A place for everyone that is inviting, unique in character, socially inclusive and affordable.

It fails.

The overdevelopment is not inviting. Burying the harbourâ€™s edge in a mountain of masonry does not respect character, Many of the apartments will have unacceptable levels of noise and air pollution. There is an inadequate amount of affordable housing.

Principle 12: Expand the range of recreational, community and cultural facilities.

Unclear.

Principle 13: Plan for the future communityâ€™s education, health, social and cultural needs.

Unclear.

Principle 14: Deliver development that is economically, socially, culturally and environmentally viable.

It fails.

The development does not respect the landscape or the character of Pyrmont. The lower floors adjacent to the Western Distributor will suffer noise and air pollution. Only 70% of apartments have adequate solar access.

Principle 15: Embed and interpret the morphology, heritage and culture of the site to create an authentic and site responsive place.

It fails. Heritage is about the tangible. In the case of Blackwattle Bay and the Pyrmont Peninsula, caring for heritage is about respecting the land and its topography, not burying it in a mountain of masonry and exacerbating, rather than ameliorating, the impact of the Western Distributor.

The Blackwattle Bay Precinct Study identifies â€œthe need to better represent and engage knowledge and values of First Nationsâ€ (p. 99), and says the precinct should â€œcelebrate the cultural importance of Blackwattle Bay to the Wangal and Gadigal peopleâ€. The stories of the traditional ownersâ€™ connections with the land will be richer if the topography remains legible.

Principle 16: Foster social and cultural understanding and respect to heal and grow relationships.

It fails.

In the community consultation process in 2020 the public were presented with three schemes all of which involved very dense development. Information was scanty on how important things such as reconnecting Blackwattle Bay to the Pyrmont peninsula would be achieved. This felt like a pseudo consultation done as a box ticking exercise and not based on respect.

APPENDIX 2.

To help guide the project the following nine objectives were developed having regard to consultation undertaken with the community and stakeholders since 2014: (BBSSPS p.9)

Objective 1: Deliver a new retail and wholesale fish market at the head of Blackwattle Bay that is one of global Sydneyâ€™s key tourist attractions

Fails to realise its potential.

The new Fish Market will be a more successful tourist attraction if it is in an attractive setting, not adjoining a massive overdevelopment which abuts a gloomy flyover.

Objective 2: Deliver a continuous foreshore promenade connecting Glebe foreshore to Pyrmont, which is activated, connected and resilient

It fails.

Resilient means being wide enough to accommodate its users. What is proposed is not fit for the purpose.

Objective 3: Design and deliver a high-quality public domain that links Blackwattle Bay to the foreshore and Wentworth Park and integrates with the wider public domain

It fails.

It does not integrate with Pyrmont and the height of the buildings are intrusive.

Objective 6: Deliver housing affordability and diversity consistent with government policy â€“ Towards our Greater Sydney 2056 and the Eastern City District Plan

It fails.

There is very little affordable housing provided and no public housing.

Objective 8: Provide social infrastructure including recreation and open space to support the overall population needs

It fails.

Too many buildings and not enough open space.

Objective 9: Optimise financial and economic benefits to NSW.

It fails.

In the knowledge based economies of the 21st century liveability and attractiveness are key factors which attract innovators and entrepreneurs. The plan fails to capitalise on the opportunities offered by its setting to improve the western edge of the Pyrmont peninsula. It is very second rate and uninspiring.

Yours Faithfully,

Janet Wahlquist

President,

The Glebe Society

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COMMUNITY • ENVIRONMENT • HERITAGE

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Blackwattle Bay Submission,
Locked Bag 5022,
Parramatta NSW 2124
planning.nsw.gov.au/blackwattle Bay

Dear Sir/Madam

Re: Blackwattle Bay State Significant Precinct Study.

The Glebe Society is committed to protecting and conserving the heritage, environment and community of Glebe. It was founded in 1969 and has over 400 current financial members. One of its proudest achievements is its role in reclaiming the land around the foreshores for the public as industry left the suburb, and the subsequent development of the foreshore walk and parks around Blackwattle and Rozelle Bays. Blackwattle Bay is one of the boundaries of Glebe, and The Glebe Society cherishes the Bay, its history, its natural values and its amenity.

The Glebe Society objects in the strongest possible terms to virtually every detail of this study; to the assumptions, to the 'vision', to the proposed legislative and planning changes, and to the plan itself. The Society also objects to the process recommended in Blackwattle Bay State Significant Project, Statement of Intended Effects.
The Glebe Society believes the development should not be classified as State Significant because it constitutes extremely poor planning. The primary consideration has been density at the expense of other requirements, including important community-supported criteria, some of which are listed in the Appendices.
The land in question is public land, but we believe that not only does it not deliver any public good, the plans, if delivered, would be detrimental to the site, to the precinct, to Blackwattle Bay and to Glebe.
The Glebe Society believes the proposal is a massive overdevelopment of the site, and would bring more residents and workers to the area than could be sustained.
The foreshore walk is far too narrow. It would be overshadowed by the buildings and windy. Paths shared between pedestrians and cyclists do not work.
There is inadequate provision of affordable housing.
The needs of passive water users of Blackwattle Bay, the so called "blue space" have been overlooked. The plan preferences private marinas over community users and access.
The plan states that 30 per cent of the area is public open space, but much of it is in overshadowed windy areas between tall buildings.
In September 2017, the NSW Government invited community members "to engage in the visioning for a future Blackwattle Bay" and to contribute to the writing of a set of Design Principles to guide the preparation of the Precinct Plan. The result was 16 guiding principles. However, the plan fails to fulfill 11 of its guiding principles, and there is no clear path to fulfilling another two. (Appendix 1).
The plan also fails to meet six of the the nine objectives that apply to consultation with the community and stakeholders. (Appendix 2)
This development, and the construction of the new Sydney Fish Markets, are based on pre-Covid 19 pandemic thinking. Tourism from China has collapsed and workers and residents are leaving

the CBD. The State Government faces having a ring of new, underutilised buildings around Blackwattle Bay, a Bay that belongs to the people of NSW.

For Glebe residents, the proposed development would literally overshadow the suburb in the early morning. The buildings would tower over the Bay, destroying the natural amenity of the Bay, and bring increased traffic pressure to our roads that will also have to cope with unacceptable increases in traffic and parking from the new Sydney Fish Markets.
The Glebe Society has fought, and continues to fight, to maintain Glebe's wonderful built heritage. The proposed development, touted as an extension of the CBD, would place further pressure on Glebe to yield to intrusive, inappropriate and unacceptable developments.

On the Pyrmont side, the Western Distributor is a shadowy chasm separating Pyrmont from Blackwattle Bay. It destroys the legibility of Pyrmont as a peninsula and is a gloomy wasteland redolent of danger which makes the pedestrian experience of walking across Pyrmont to the bay unpleasant.
The views to the west with the harbour in the foreground and beyond Glebe Point, with its interesting topography landscape and architecture, are beautiful and interesting. Great potential exists to open up these vistas. It is a distinguished, indeed, a painterly vista which allows the Distributor with its vertical stanchions and horizontal roadway to be read as a frame enclosing a great and beautiful landscape.
The proposal does not take advantage of these opportunities. Apart from a narrow slot of open space to the bay on the Miller Street axis, the proposal will make the Distributor's under croft even gloomier by enclosing it with a wall of buildings.
This is not the hallmark of distinguished place making. Blackwattle Bay provides the opportunity to show the world how clever design can ameliorate the impact of traffic engineering on a beautiful place. The scheme fails dismally in this regard.
The document correctly identifies Blackwattle Bay as *an extraordinary opportunity to reconnect the harbour, its surrounding neighbourhoods and the city; to showcase Sydney's living culture and stories of Country; to build an inclusive and iconic waterfront destination that celebrates innovation, diversity and community.* (Blackwattle Bay State Significant Project Study, page 1)
The Plan fails that vision. (Appendix 1)

Consultation.
The Glebe Society has participated over the years in a series of meetings, seminars and planning about the future of the Bays Precinct. The release of the three scenarios, titled "Revitalising Blackwattle Bay", which included 45 storey towers in May 2020 was sprung on the community without consultation. The community was shocked by the proposal and overwhelmingly rejected it. The Plan again ignores the results of many consultations, and the wishes and aspirations of the community. The Plan fails six of its nine objectives for community consultation. (Appendix 2)

RECOMMENDATION 1. The Glebe Society requests the Minister for Planning, Industry and Environment order a review of the proposals for Blackwattle Bay, and institutes genuine consultation with the community to produce plans that respect the environment, heritage and architectural scale of Blackwattle Bay.

Lack of a Master Plan.

In March 2010, "Towards an Integrated Strategic Plan: Bays Precinct" was presented to Government. It was the result of wide consultation. All master plans for Blackwattle and Rozelle Bays were cancelled when the Coalition Government was elected in 2012. Planning for the Bays passed to Urban Growth, and then Infrastructure NSW (INSW) where it remains.
The Plan is the result of a series of changes to planning legislation. It seeks changes to six State planning controls. (Blackwattle Bay State Significant Precinct Study (BBSSPS) page 96).
These include amending the Sydney Local Environment Plan 2012 to allow a maximum building height of 156, and removing the site from the Sydney Harbour Catchment SREP.
The Plan seeks to remove the requirement to prepare a Development Control Plan when proposed developments increase gross floor area. SREP 26 deals with the protection of views and the scenic quality of foreshores and waterways, but the Plan ignores that, instead producing a concept DA.

RECOMMENDATION 2.
The Glebe Society requests the preparation of a Master Plan as the basis for development. The terms of reference for the Master Plan should include:
. the height, bulk and configuration of the build form must reconnect Blackwattle Bay to Pyrmont
. the foreshore walk must be at least 30 metres wide
. height controls of the existing LEP must be respected
. the impact of the Western Distributor must be minimised through good design
. and the long-standing use of Blackwattle Bay by rowers must be protected by controlling other users.
The Master Plan should be prepared for public exhibition and the City of Sydney should be the consent authority for the development.
The Glebe Society seeks compliance with SREP 26 that would ensure the development would enhance views and the scenic quality of foreshores and waterways.

The Blackwattle Bay State Significant Precinct proposal is a massive overdevelopment.
The proposal is for twelve buildings as follows:
1 x 45 Storey building (156 metres)
1 x 32 storey building (120 metres)
1 x 30 storey building (110 metres)
2 x 25 storey buildings (91.5 metres)
1 x 20 storey building (75.5 metres)
1 x 19 storey building (72 metres)
1 x 17 storey building (65 metres)
2 x 10 storey buildings (37.5 metres)
2 x 5 storey buildings (21 metres)
The tallest buildings, with a maximum height of 45 storeys (156m) are higher than the pylons of Anzac Bridge (120m). They are far higher than the highest buildings on the Pyrmont peninsula. The urban form of Pyrmont should step down to the waterfront but the planning proposal is for a wall of very high buildings along Blackwattle Bay.
The height controls in the current Sydney City Council LEP are well considered and relate to the controls nearby. They provide for a maximum of 33 metres (9 storeys). There is no justification for changing this to a maximum height of 156 metres. Buildings of this height are only found in the CBD. There is no planning or economic justification for having this height on this site.

It should be noted that the background planning documents identify the need for *a well-designed fine grain network comprising streets, laneways and arcades which will enhance the accessibility of the waterfront and permeability of the precinct.* This is not what is proposed.
The buildings are so tall they would cast shadows over Blackwattle Bay in the morning, including over the solar panels of the new Sydney Fish Market, and create wind tunnels between the buildings.
The buildings are too dense, and the expectation of 1,550 dwellings, 2,800 residents and 5,600 people employed there, would put further, damaging, pressure on an already very densely populated suburb.
The site itself is narrow, and overshadowed by the Western Distributor. This would create air pollution and noise problems for tenants of the proposed buildings. In fact, the lowest nine floors would fall outside government guidelines for apartment air quality and noise levels, so the plan is for those floors to be used for business and retail. Surely this puts the health of the workers in those businesses at risk.
The noise and air pollution from the Western Distributor would also mean it will not be possible to open windows on the north east side of the building adjacent to and above the western distributor, inhibiting natural ventilation. This compromises the vaunted sustainability of the proposal.
Sustainability is further compromised by lack of solar access. The BBSSPS states: "Setbacks, building separation, orientation and floor plate layouts across both sites ensure that 70% or more of the apartments in each residential tower are able to achieve a minimum of two hours of sunlight on the 21st of June (winter solstice). (p. 113)
What about the other 30 per cent?
Further, the determination of the Hymix concrete batching plant to remain at its Banks Street site, will mean the proposed residential, office and retail space will be immediately adjacent to a noise industrial site, with frequent truck movements, with the possibility of working 24/7. (BBSSPS page 71)
RECOMMENDATION 3: 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. Buildings should also conform to sustainable building standards.

The plan does not deliver a foreshore walk congruent with the walk along Johnstons Bay and around the Glebe foreshore. It is too narrow, too shadowed and too windy. At 10 metres wide it is too narrow to provide for the number of people who will use it, which would include pedestrians, shoppers and tourists milling about, cyclists, parents pushing strollers, wheelchair users and people walking dogs. If the Glebe foreshore is any indication, the proposed walk will come under heavy pressure.
The new Sydney Fish Markets is expected be a local, national and international tourist attraction. This, along with the completion of the 'missing link' in the foreshore walk from Woolloomooloo to Rozelle Bay, means it will be used by large numbers of people.
The Glebe Society objects to the path walk being a shared path (shared by both pedestrians and bicycles) which has been shown not to work on the Glebe foreshore walk. It needs to be at least 30 metres wide to accommodate so many different users, and to allow for separate paths for pedestrians and cyclists.
The parks proposed are small, narrow and piecemeal, and will be overshadowed for the first half of the day. They will also be windy, thanks to the proposed buildings creating wind tunnels. The

City of Sydney has produced a map indicating 13 places on the proposed plan that are not safe, while 27 are not comfortable for walking. It also argues standing and sitting comfort is not considered.
The City of Sydney states the sunlight in the proposed parks is less than the City's requirements, and few, if any streets will have enough sunlight for good tree growth.
The BBSSPS states that 30 per cent of the site will be open space, but a narrow corridor between two towers, though counted in that percentage, does not fit that description.
The most recent inner city foreshore development, Barangaroo, allocated 50 per cent of the area to open space.
RECOMMENDATION 4: The Glebe Society believes 50 per cent of the area should be open space. The foreshore walk should be 30 metres wide, with separate paths for pedestrians and cyclists. Adequate seating must be provided.
Tree plantings must have adequate sunlight to grow and be protected from damaging winds.

The expectation that 80 to 85% of residents will not use private cars is unrealistic. It also borders on the bizarre, given the growing presence of Westconnex across the Bay that will deliver huge numbers of cars to the Bay. The BBSSPS in fact boasts that the major stages of Westconnex will be completed in 2023, "two of which [will] deliver road infrastructure to the Bays". So many cars, so little parking.
Plans to improve public transport, including buses, light rail and ferries, to the area would be welcomed – if they actually come into effect. Although the plan expects an increase in light rail services, it is understood the expansion of light rail, which prior to the pandemic was at capacity in peak hour, cannot be expanded due to the power supply, stabling, the single track and Dulwich Hill. ("Extra trams to east crowding on Sydney's Inner West line still years away." Sydney Morning Herald, July 2, 2019)
We note the new Sydney Fish Market (SFM), while expecting a doubling in visitor numbers over the next ten years, is not providing a single extra car space in the new building. Glebe residents fear our street parking spots will be overtaken by visitors to the SFM, and locals, most of whom do not have private parking spaces, will be disadvantaged. Despite the expectation of the planners, people will still want to own cars and to drive. The shortage of parking spaces will place even more pressure on Glebe.
RECOMMENDATION 5: Reduce the forecast population of residents and workers. Establish new public transport routes, including a ferry service to Blackwattle Bay, and where possible increase existing services.

Only five per cent of the residential supply would be affordable rental housing, or developers can make an equivalent monetary contribution, which can be used elsewhere. This has been the past experience in Pyrmont. There is a huge demand for affordable rental housing in the inner city.
The City of Sydney advocates 25 per cent for government owned land.
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https://www.smh.com.au/money/investing/vacancy-rates-still-high-for-inner-city-rentals-20210416-p57jtc.html
The proposed Blackwattle Bay development, along with the new Fish Market, risks falling victim to the Covid pandemic, adding to the oversupply of vacant residential and office space in the CBD, and financial stress for the developer.

RECOMMENDATION 10: INSW should engage independent consultants to put together a report on the projected impact of Covid and tensions with China on longer term demand for housing and commercial space in the area.

Finally, it is our understanding that the massive overdevelopment is intended to recoup the $750 million cost of the new Sydney Fish Markets. The Glebe Society believed it would have been better to rebuild the Fish Market on the current site. The vendors at the Fish Market objected to having the Market rebuilt while they continued trading. We lost that fight, but we do not believe Glebe and Pyrmont should have to pay the price of the recalcitrance of the Market vendors, and the ambitions of the state's tourism industry.

RECOMMENDATION 11: The cost of construction of the new Sydney Fish Market should be shared between the State Government and the industries that expect to benefit from it. It should not be earned from the over development of the current Fish Market site.

CONCLUSION.

The Plan asserts that the buildings will be tested by principles of good design. This is fallacious. The building envelopes in the planning process are too dense and too tall.

Good design is about considering all the elements, including impact of the neighbouring buildings, ameliorating the gash of the Western Distributor and managing scale, sunlight, amenity, open space and the foreshore walk.

This proposal is primarily driven by density. The scheme is fatally flawed because it starts with bad design. It is misleading to claim that a bad plan can be rectified by a design code. It cannot.

The Blackwattle Bay State Significant Project, Statement of Intended Effect claims that ***t****he overall design of the Blackwattle Bay Precinct Plan delivers a diverse, welcoming and inclusive place, and stays true to the essence of Pyrmont as an eclectic, vibrant and unique neighbourhood.* Even in the age of spin it is rare to encounter such a huge disjunction between claims and reality.

APPENDIX 1.

The plan lists 16 guiding principles. BBSSPS page xiii.

How does the proposal stack up against its sixteen guiding principles?

Principle 1: Improve access to Blackwattle Bay, the foreshore and water activities for all users.

It fails.

By cutting off vistas of the Bay instead of opening them up it reduces access. The promenade is not wide enough.

Principle 2: Minimise additional shadowing to Wentworth Park and Glebe Foreshore (in mid-winter) and create new places with comfortable conditions for people to enjoy.

It fails.

The tall buildings proposed will cause overshadowing.

Principle 4: Prioritise movement by walking, cycling and public transport.

It fails.

A priority should be to use clever design to ameliorate the impact of the Western Distributor and enhance the experience of pedestrians walking from the city and Pyrmont.

Principle 6: Link the Blackwattle Bay precinct to the City, Glebe Island and White Bay and other surrounding communities and attractors.

It fails.

The promenade is not wide enough.

Principle 7: Mandate Design Excellence in the public and private domain.

It fails.

The building form is too dense. Starting with bad design is not mandating design excellence.

Principle 8: Integrate housing, employment and mixed uses to create a vibrant, walkable, mixed use precinct on the city's edge.

It fails.

More affordable housing is needed. It is not clear from the studies that the commercial uses will be vibrant or viable.

Principle 9: Maintain and enhance water uses and activities.

It fails.

No proper consideration has been given to the continued use of the Bay for rowing. This is threatened by unplanned introduction of other uses. The Bay houses Sydney's third oldest rowing club. There is a living heritage of rowing on Blackwattle Bay stretching back almost 150 years. This must be respected.

Principle 11: A place for everyone that is inviting, unique in character, socially inclusive and affordable.

It fails.

The overdevelopment is not inviting. Burying the harbour's edge in a mountain of masonry does not respect character, Many of the apartments will have unacceptable levels of noise and air pollution. There is an inadequate amount of affordable housing.

Principle 12: Expand the range of recreational, community and cultural facilities.

Unclear.

Principle 13: Plan for the future community's education, health, social and cultural needs.

Unclear.

Principle 14: Deliver development that is economically, socially, culturally and environmentally viable.

It fails.

The development does not respect the landscape or the character of Pyrmont. The lower floors adjacent to the Western Distributor will suffer noise and air pollution. Only 70% of apartments have adequate solar access.

Principle 15: Embed and interpret the morphology, heritage and culture of the site to create an authentic and site responsive place.

It fails. Heritage is about the tangible. In the case of Blackwattle Bay and the Pyrmont Peninsula, caring for heritage is about respecting the land and its topography, not burying it in a mountain of masonry and exacerbating, rather than ameliorating, the impact of the Western Distributor. The Blackwattle Bay Precinct Study identifies "the need to better represent and engage knowledge and values of First Nations" (p. 99), and says the precinct should "celebrate the cultural importance of Blackwattle Bay to the Wangal and Gadigal people". The stories of the traditional owners' connections with the land will be richer if the topography remains legible.

Principle 16: Foster social and cultural understanding and respect to heal and grow relationships.

It fails.

In the community consultation process in 2020 the public were presented with three schemes all of which involved very dense development. Information was scanty on how important things such as reconnecting Blackwattle Bay to the Pyrmont peninsula would be achieved. This felt like a pseudo consultation done as a box ticking exercise and not based on respect.

APPENDIX 2.

To help guide the project the following nine objectives were developed having regard to consultation undertaken with the community and stakeholders since 2014: (BBSSPS p.9)

Objective 1: Deliver a new retail and wholesale fish market at the head of Blackwattle Bay that is one of global Sydney's key tourist attractions

Fails to realise its potential.

The new Fish Market will be a more successful tourist attraction if it is in an attractive setting, not adjoining a massive overdevelopment which abuts a gloomy flyover.

Objective 2: Deliver a continuous foreshore promenade connecting Glebe foreshore to Pyrmont, which is activated, connected and resilient

It fails.

Resilient means being wide enough to accommodate its users. What is proposed is not fit for the purpose.

Objective 3: Design and deliver a high-quality public domain that links Blackwattle Bay to the foreshore and Wentworth Park and integrates with the wider public domain

It fails.

It does not integrate with Pyrmont and the height of the buildings are intrusive.

Objective 6: Deliver housing affordability and diversity consistent with government policy – Towards our Greater Sydney 2056 and the Eastern City District Plan

It fails.

There is very little affordable housing provided and no public housing.

Objective 8: Provide social infrastructure including recreation and open space to support the overall population needs

It fails.

Too many buildings and not enough open space.

Objective 9: Optimise financial and economic benefits to NSW.

It fails.

In the knowledge based economies of the 21st century liveability and attractiveness are key factors which attract innovators and entrepreneurs. The plan fails to capitalise on the opportunities offered by its setting to improve the western edge of the Pyrmont peninsula. It is very second rate and uninspiring.

Yours Faithfully,

Janet Wahlquist
President,
The Glebe Society

182276

Wilson

Glebe 2037

Objection Blackwattle Bay State Significant Project

I strongly object to Blackwattle Bay State Significant project for the following reasons:

This concept plan was proposed and displayed in the critical time period of COVID-19 and failed to address the future planning Post COVID-19

Height and density is excessive and causes severe overshadowing

There is no strategic plan to address the needs of cyclists and pedestrians

There is an inadequate percentage of affordable housing

Severe issues around wind tunnels between tall buildings

No consideration about Post COVID-19 planning

No inclusion of Social Housing in the plan

New Sydney Fish Market will be overshadowed in 9:00 and 3:00pm cycles, thus reducing the quality for visitors.

Lack of open space for residents

No consideration for the needs of passive water users in Blackwattle Bay

The current concept should reflect the 2021 Census when released.

No Traffic Plan has been developed to demonstrate the impact on Glebe/Forest Lodge and its connection to WestConnex and proposes Sydney Harbour Tunnel.

I believe the proposed project fails to address the major issues of strategic planning and the impact on the local of the Inner West and the connection to Central Sydney

Jan Wilson

Glebe

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- No inclusion of Social Housing in the plan
- New Sydney Fish Market will be overshadowed in 9:00 and 3:00pm cycles, thus reducing the quality for visitors.
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- No consideration for the needs of passive water users in Blackwattle Bay
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Jan Wilson
Glebe

181991

Wu

Pyrmont

Hi,

Please see attached my submission for your consideration. Feel free to reach out to me directly should you need any clarifications.

Angela

Blackwattle Bay Redevelopment

Angela Wu Submission 19 August 2021

Dear NSW Department of Planning, Industry and Environment ("DPIE"),

My name is Angela Wu and I am an existing home owner within Pyrmont. I would like to thank you for the opportunity to submit my response to the recently posted *Blackwattle Bay State Significant Precinct Study public exhibition – July 2021*.

Within my submission I will be **objecting to the proposed planning controls surrounding development of the towers**. As part of this submission I will be drawing reference to the following documents:

- Draft Pyrmont Peninsula Place Strategy July 2020 ("PPPS")
- Blackwattle Bay Precinct Plan 2020 ("BBP Plan 2020")
- Blackwattle Bay State Significant Precinct Study June 2021 ("The Proposal")

I hope that my submission and recommendations will be considered to shape the outcome of a development that is highly impactful to myself and my community.

Please feel free to reach out to me directly should you have any questions regarding my submission.

I thank DPIE once again for the opportunity to present my opinion.

Kind Regards,
Angela Wu

Attachments to this Submission include:

- Pyrmont Peninsula Place Strategy July 2020 submission dated 12 September 2020 ("PPPS Submission") (*attached in Appendix A*)
- Blackwattle Bay Precinct Response Angela Wu submission dated 30-05-20 and submitted to the Infrastructure of NSW ("BBP Submission 1") (*attached in Appendix B*)

Principle 1: Misalignment of Proposal with community consultation findings

A key concern of the Proposal is its **gross misalignment with findings from "extensive community engagement"**, including but not limited to findings from the PPPS Engagement Report and submissions by the community for the BBP Plan 2020. Attachment 11 of the Proposal ("Engagement Report") acknowledges that: *"Building height was the most commonly raised issue and was discussed in the majority of submissions. People expressed the view that sustainable growth needs to be balanced with the local context of the Pyrmont Peninsula and surrounding areas which is characterised by medium density built form."*.

Despite the community persistently objecting to high-rise buildings, tower structure, large developments or similar, the **3 scenarios proposed by the BBP Plan 2020 were presented to for feedback as a fait accompli.** Options to respond were limited to consensus with at least one of three designs which all incorporated similarly inappropriate high rise built form - it was clear that opinions to dissent or request for alternatives would not be heard.

The recent Proposal has unfortunately reiterated the lack of intent for the DPIE to consider the findings from community consultation **ultimately undermining the intent of SR28.2** which calls for the shaping and evolving of plans based on the feedback and opinions expressed. Baseless claims have been made by INSW to have achieved this requirement yet no adjustments has been made to the heights of the proposed towers - rather the Proposal has just been supplemented with superficial statements of justification to justify its position.

It is difficult to trust that community consultations have been conducted with the intent to provide an opportunity to influence the outcome of the impactful project. Particularly when the window for response offered was ludicrously short with an equally trivial offer of extension of time.

Alignment of community engagement and design is required to achieve a coherent solution for master plans of this scale. **Ignored community engagement will inevitably lead to a fractured Pyrmont community of the future** and likely higher development costs from project delays.

Recommendation 1 - Align design with community engagement findings

It is recommended that the Proposal be redesigned to align with findings from community consultation. In this instance, there is a clear direction for **complete removal of high rise developments and replace green open space, or at least context appropriate built form** (no higher than 16 floors).

Principle 2: An out of context development

2.1 Threat to Pyrmont's heritage and feeling of community

> *"Pyrmont contains some of Sydney's most precious heritage…"*

As already highlighted in the Blackwattle Submission, and echoing the opinion of fellow existing residents, the proposed tower and skyscraper forms are grossly out of context with the "urban village" nature of Pyrmont of the past and today. The Engagement Report reveals that "respondents praised the area's village feel" and the sense of intimate community that Pyrmont embodies. **This unique nature of Pyrmont must be preserved and not be threatened by the imposition of skyscrapers** which are clearly only appropriate for the CBD.

The Proposal persistently refers to Pyrmont as an "extension of the CBD" to justify tower forms. This only highlights the **lack of understanding of the**

significance of Pyrmont. **Pyrmont is not an extension of the CBD either physically or metaphorically.**

2.2 Need for context appropriate design

Pyrmont morphology is primarily low-rise to medium scale ranging between 5 to 16 stories. Intertwined with the fabric of these medium scale apartment buildings are single storey heritage terrace houses to provide the density required. Therefore, there should be no surprise that there is an outcry from existing residents of Pyrmont in opposition of towers and skyscrapers ranging from 45 to 70 storeys. This equates to an **abhorrent 300-500% increase in height from surrounding building form**.

The Proposal references the intention to protect select heritage conservation areas which primarily consist of low-rise, small scale homes. However, the Proposal is failing to address the undisputed visual impact of starkly juxtaposed tower structures which will overbear these heritage elements. It is essential that new buildings and developments strive to harmonise with historic ones.

The towers are completely out of scope with the current and future visions for the area.

2.3 Unclear methodology for derivation of heights

Clarity was sought from both Infrastructure NSW and DPIE on the methodology for how height planes were derived. During consultation, vague responses were provided and referenced heights guided by the CBD skyline and aviation limits. Unfortunately the Proposal has not provided any clearer answers. My response to each point used to determine the height of these towers is as follows:

1. *Solar access to existing and future open space* - No shadow diagrams have been provided for existing residences in Pyrmont. Shadowing to new amenity spaces and the Sydney Fishmarket has been proven and criticised heavily.
2. *Land morphology* - The dramatic change in height over a short distance from the waterline of Blackwattle Bay to the height of the tallest towers is dramatic and completely inappropriate. This Proposal is not sensitive to land morphology at all.
3. *Height of surrounding buildings* - CBD buildings are not considered as part of the definition of "surrounding buildings". To suggest the proposed towers are an appropriate height compared to actual surrounding buildings is farcical.
4. *Height of Anzac Bridge pylons* - No new built form should be surpassing, shadowing or eclipsing these iconic structures (which have a height equivalent of 40 storeys). These are apartment buildings bearing no historical significance; using these structures by way of justifying height is inappropriate and tone deaf.

2.4 Detraction from prominent Architecture

Blackwattle Bay and its surrounding areas hold deep history that is embodied within its Architecture - namely the Anzac Bridge and now the new Sydney Fish Market which has been heralded as an icon for prestigious design. With this in mind, it seems arrogant for the Proposal to detract from this Architecture with its overbearing height. **New built form in the area is expected to show humility to our Sydney icons** - think of development near the Sydney Opera House.

Recommendation 2 -

Carefully review the proposed maximum building heights with consideration for:

- Preserving Pyrmont's heritage and sense of community;
- Context appropriate design (this excludes the CBD); and
- Respect for prominent Architectural icons (Anzac Bridge and new Sydney Fish Market).

Principle 3: Compromise to existing residents and neighbouring areas with limited consideration for social impacts.

The Proposal, including all artistic renders presented, and attached studies, have been heavily biased towards benefits that will be offered to new residents of Blackwattle Bay. The website gallery (as one example) only shows viewpoints from within Blackwattle Bay, with neighbouring areas eclipsed by the new built form. Unfortunately this epitomises the Proposal's lack of consideration and lack of demonstrable respect for existing residents and neighbouring areas.

Without reiterating the detail of points raised in previous submissions by both myself and members of the community, tower forms proposed will compromise existing residents in the following ways:

A. **Lack of enjoyable public open green space** which has been reduced to an unacceptable 30% due to the overbearing footprints of the tower podiums.
B. **Wind impacts** from the form and placement of the buildings which will render any gesture of public or amenity space unenjoyable even if introduced.
C. **Overshadowing** of public spaces, water amenity areas, the new Sydney Fish Market structure, and living spaces of surrounding apartment buildings.
D. **Severe loss of view and amenity** by existing residents with the direct line of sight to Blackwattle Bay being replaced with the back of cold high rise towers. To date there has been no depiction of views of the development from the perspective of existing residences in Pyrmont and Glebe.
E. **Creating a physical divide between Pyrmont, Glebe & Blackwattle Bay** via a literal wall of mammoth towers imposed at the junction of low to mid-rise residential areas with historically "village" character.
F. **Limited provisions for social or affordable housing** irrevocably displacing existing residents relying on these homes, despite the slighting gesture of a 5% monetary contribution which is far below any decent standard for government owned land.
G. **Risk of limiting access to Blackwattle Bay to the wealthy** while removing the right from existing residents.

Recommendation 3 -

Redesign the development with the theme of an integrated community in mind. The Proposal must demonstrate a balanced focus to both new residents and a well established existing community. Impacts to existing residences should be used as a key performance indicator of the development to ensure efforts are made to either maintain or improve amenity.

Principle 4: Lacking any sense of design excellence or innovation

> *"There's nothing wrong with high density, but high rise and high density are not always the same thing. You can have medium rise and high density"* - Helen Lochhead

There is a **need for a sensible and innovative approach to growth and density**.

Whilst it is recognised that Pyrmont has a real opportunity for growth, the community is convinced that unfortunately it has been used as an ingenuine excuse for passing through private developers' profit strategies.

> As Sydney's Lord Mayor, Clover Moore, observed the development is *"a Trojan Horse for large apartment towers designed not with people in mind, but maximum developer profits".*

The Proposal has tried to justify incongruous tower forms as a solution to achieving "good growth" for the future of Sydney. For various reasons, a proposal

for tower buildings in Pyrmont can not be considered a "sensible" approach, considering its inherent insensitivity to the existing context of Pyrmont.

There is no doubt that tower structures are a quick and easy solution to achieving density. However this is not considered good design and certainly does not represent Pyrmont to be a place of innovation and technology as the PPPS has outlined in its vision.

It is expected that the Proposal embodies the vision of innovation via translation into innovative design solutions, strategies and building forms.

Higher densities do not always have to necessitate tall buildings, particularly where a well-considered, design-led approach is taken. Considering Pyrmont has been cited as "Australia's most densely populated suburb", a careful and innovative approach to increasing density is fundamental to the successful future of Pyrmont.

A sensible approach to growth should be achieved via a density policy with strategic linkages to demographic and economic growth, employment creation and productivity.

Urban planning experts around the world have suggested **mid-rise for the best quality of correspondence between the human scale and the development of density** of the city.

Recommendation 4 -

It is strongly recommended that INSW **revisit the drawing board to achieve density goals with innovation at the forefront**. Where built form is required strive for well designed low-mid rise development that could be implemented in lieu of tower structures. Examples of things to note include:

- Human scale built form
- A completely accessible ground floor where there is a blend between built form and public spaces
- Accessible water line and public space that is not overshadowed by towers

As per my earlier submission, it is also recommended that the design team reflect some of the 'Urban Innovations' published by Sidewalk Labs (subsidiary of Google) for some inspiration on what could be implemented for Blackwattle Bay. This level of innovation and design calibre is synonymous with the vision for Pyrmont representing a place for innovation.

Urban innovations include strategies for:

- Mobility
- Public Real
- Buildings and Housing
- Sustainability; and
- Digital Innovation

A copy of this document can be found here: https://storage.googleapis.com/sidewalk-toronto-ca/wp-content/uploads/2019/06/23135715/MIDP_Volume2.pdf

This community consultation is an opportunity for reflection on the legacy that is to be left behind - **is this a project representing the vision of innovation or another example of sell-out to privatisation?**

Conclusion

This concludes my submission for the Blackwattle Bay State Significant Precinct Study public exhibition – July 2021. Thank you for your time in reviewing this document and I look forward to future iterations of the exhibition which I hope and expect will address the concerns and findings by the Pyrmont community.

With respect to my submission, a summary of key points to address are as follows:

1. Align design of built form to reflect community engagement findings.
2. Removal of high rise developments and replace green open space, or at least context appropriate built form.

3. Maintain maximum building heights applying to the site under SLEP 2012.
4. Carefully review the proposed maximum building heights with consideration for:
    - Preserving Pyrmont's heritage and sense of community;
    - Context appropriate design (this excludes the CBD); and
    - Respect for prominent Architectural icons (Anzac Bridge and new Sydney Fish Market).
5. Redesign the development with the theme of an integrated community in mind.
6. Revisit the drawing board to achieve density goals with innovation at the forefront - tap into international projects for examples of design excellence.

Appendix A

Pyrmont Peninsula Place Strategy July 2020 submission dated 12 September 2020 (“PPPS Submission”)

RE: COMMUNITY ENGAGEMENT - BLACKWATTLE BAY PRECINCT PLANNING

Dear Infrastructure NSW,

My name is Angela Wu and I am an existing home owner within Pyrmont. I have felt compelled to submit my opinion on the Blackwattle Bay Precinct Plan ("the Plan") via email as I believe the online community and stakeholder survey does not enable for many community members to express their opinions accurately. For clarity, the survey is biased as response options are narrow and forces the respondent to express preference for at least one of the three proposals presented. As far as I understand, there is no option to select none of the proposals.

All proposals include 45 storey high-rise tower built forms which are unsuitable to the precinct for various reasons. Through consultation with various stakeholders of the Pyrmont area, I can confirm my opinion of this is shared by many. I have drafted this response letter after thorough review of the brochure titled 'Revitalising Blackwattle Bay' outlining the Plan, as well as attendance of the community webinar dated 26 May 2020 ("the Webinar").

Suitability of Tower Built Forms

The reasons to support my statement that high-rise builts forms are not suitable for the precinct are set-out as follows:

1. **How was the maximum height of the tower built forms derived?**
   Neither the Plan or the Webinar has been able to clearly justify how the maximum height of 45 storeys has been derived.
   a. As presented on page 8 of the brochure and the Webinar, it has been recognised that Pyrmont Morphology is primarily low rise to medium scale ranging between 5 to 16 stories. When directed the question of how the maximum height of the towers was figured, David Haseler referred to the CBD skyline and Darling Harbour as reference points rather than the immediately impacted and adjacent area of Pyrmont. As clearly demonstrated on page 8 of the brochure, the maximum height of the towers even exceeds the majority of referenced projects which primarily fall within the 30-35 storey range.
      i. How and why the CBD and Darling Harbour are appropriate reference points for dictating the built form in Blackwattle Bay?
      ii. Why should the design of the Plan not address its immediate surroundings as a priority?
   b. David Haseler had commenced the presentation by suggesting the Plan will serve as "an extension to Pyrmont". This statement seems to be contradictory to the resulting proposed design which does not mirror or even gesture to the immediately adjacent architectural fabric dictated by existing buildings. It seems the "extension" to Pyrmont is merely geographical with the design demonstrating very little intention to be part of Pyrmont - rather, an extension of the CBD.

c. 45 storey towers are not relatable at a human scale from the waterfront nor from the direction of Pyrmont and certainly do not fit the context of a heritage sensitive suburb such as Pyrmont. This point is perhaps reinforced in the artist's impressions of each scenario contained within the brochure. It is unlikely a coincidence that tower renders are faded to draw attention to the podium built forms which are far more appropriate to the context.
d. It has been identified that the Anzac Bridge Pylons is 40 storeys and holds significance in Australian architectural history as the first cable stayed bridge. All existing built form falls below this to not take away from its significance. Why does the design team feel it's appropriate to have towers in all 3 proposals exceed this height?
e. It was presented at the Webinar for all 3 proposals that "North Western End towers relate to existing developments". This begs for me to question why the other towers are not subject to the same guidelines?
f. The sun study presented at the Webinar referenced consideration for Glebe Park and existing residential areas to the south. Please can you clarify why residential areas towards Pyrmont were not considered as part of this study? I believe a proper sun study should consider all surrounding residential buildings, not only a selection. Lack of consideration to all surrounding residential buildings will erode the enjoyment of Blackwattle Bay by existing residents via obstruction of natural light, and replacement of vistas to the water with views to the back end of 3 or more context insensitive towers.
g. Please refer to **Attachment A** for a diagram supporting how the tower built forms are unsuitable.

2. **Why are the tower built forms necessary?**
Neither the Plan nor the Webinar has been able to clearly justify why the tower developments are necessary to enable the success of the Plan.
    a. I refer to Geoff Gerring's response to this question from the webinar who suggested that this was a "once in [a hundred years] opportunity to develop on the waterfront". My personal interpretation of this response is that the development of Blackwattle Bay has been considered as an opportunity for developers to commercially benefit - with or without consideration of the existing residents surrounding the precinct. I do not feel that this is an appropriate response.
    b. The Plan refers to support of "affordable housing" being considered for 5 to 10% of dedicated new floor space. Can you please justify why the remaining 900-1000+ apartment developments will be necessary to Pyrmont which has often been referenced as "the most densely populated suburb in Sydney"?
    c. The Podium Scale built forms appear to be far more appropriate to the context whilst helping achieve the key principles set out by the Plan. The podium built forms defined as 4 to 6 storeys (21m) and recognised as "desire human-scale

height" provides for a more sensitive transition from the CBD to mid-rise Pyrmont down to the newly activated water's edge.

3. **Does the Plan take into account precedent rulings by the Independent Planning Commission?**
   I refer to the precedent set by the Independent Planning Commission on the recently determined Star Casino Redevelopment MP 08_0098 (MOD 13) Project. The proposed design for the Plan across all 3 scenarios can be considered in a similar fashion and do not exercise good design and amenity of the built environment. In a similar argument, I strongly believe that the towers proposed will result in unacceptable built form, including tower(s) of a height which are overly obtrusive and will result in unreasonable and unacceptable impacts with respect to view loss, visual impact, and overshadowing.

Impacts to Traffic

The Plan is currently lacking consideration of impacts on existing and future traffic conditions in the general area. As confirmed in the Webinar, traffic modelling has not been conducted to date.

Pyrmont is located at a primary connection node with highways to: the CBD, North Sydney, Western suburbs, South Sydney and Easter suburbs. Whilst this makes it seemingly convenient for residents, Sydney's population growth has inevitably led to notoriously bad traffic at peak hours (pre-Covid 19). The existing infrastructure is already proving insufficient. To provide a personal example, a short drive down Harris Street to turn onto Bridge Road (roughly 500m) anytime after 4pm on a weekday, has often taken up to 40 minutes as commuters battle to get onto the Anzac Bridge. The Harris Street & Bridge Road junction is only one example out of many that Pyrmont locals currently suffer.

The Plan should not proceed without the following as a minimum:

- a comprehensive traffic study,
- proposals to mitigate any risk of worsening existing conditions by introducing additional influx of people to the area, and
- proposals to improve existing infrastructure to relieve traffic conditions.

Recommendation Summary

The elements of the Plan detailed above should be reviewed for good design principles and improved sensitivity to the context of the site. The main outcomes I am seeking for a revised Plan are summarised as follows:

1. No out of context high-rise tower structures.
2. Conduct a proper sun study to ensure built form design considers all surrounding residential buildings.
3. Keep new built forms to the maximum height of the proposed podiums heights (4 to 6 storeys or 21m).
4. Conduct a comprehensive traffic model to inform design of the Plan.

5. Propose mitigation strategies from the results of the traffic model to be implemented into the new Plan design.
6. Propose strategies to improve existing infrastructure surrounding the precinct to aid with traffic management.

Finally, I would like to thank Infrastructure NSW for the opportunity to provide feedback via community engagement. Pyrmont is home to many residents passionate about protecting the neighbourhood that is loved. I am keen to see our comments and concerns addressed in iterations of the Plan and design. Many of us are excited to see the new precinct come to fruition and support a lot of the principals that the Plan embodies. However, there are reservations whether these principles are being translated into the design in the best way possible to serve both existing residents and new tenants.

Kind Regards,

Angela Wu

Draft Pyrmont Peninsula Place Strategy

Angela Wu Submission 12 September 2020

Dear NSW Department of Planning, Industry and Environment ("DPIE"),

My name is Angela Wu and I am an existing home owner within Pyrmont. I would like to thank you for the opportunity to submit my response to the recently posted Draft Pyrmont Peninsula Place Strategy July 2020 ("PPPS").

Within my submission I will be drawing reference to the following documents and webinars:

- Pyrmont Peninsula Place Strategy Phase 1 Engagement Report June 2020 ("Engagement Report")
- Blackwattle Bay Precinct Plan ("BBP Plan")
- Blackwattle Bay Precinct Response submission dated 30-05-20 and submitted to the Infrastructure of NSW ("BBP Submission") (attached in Appendix B)
- Blackwattle Bay Webinar attendance dated May 26 2020 ("Webinar 1")
- PPPS Webinar attendance dated August 19 2020 ("Webinar 2")

Due to the scale of the PPPS proposal and time pressures, my submission will be focused on addressing the proposed tower structures with specific attention towards Direction 2 - Development that complements or enhances that area ("Direction 2"). This is due to the fact that this has been heralded as the most controversial component of the PPPS by the wider community and is likely to impact the community the most compared to other directions.

My submission is structured to address five findings from my review of the PPPS. Each finding is supplemented with my recommendations and ideas on how these findings can be addressed in future version(s) of the PPPS. I hope that my submission can be constructive and useful to the forming of the final strategy for Pyrmont.

Please feel free to reach out to me directly should you have any questions regarding my submission.

I thank DPIE once again for the opportunity to present my opinion on the PPPS.

Kind Regards,
Angela Wu

Note: For avoidance of doubt in how to read this document:

- *Relevant quotations and extracts supporting my findings are italicised and highlighted in grey boxes.*
- *Recommendations are highlighted in blue boxes.*

Appendix B

Blackwattle Bay Precinct Response Angela Wu submission dated 30-05-20 and submitted to the Infrastructure of NSW

Finding 1: Misalignment of strategy with community engagement findings

"Comments celebrated the area's medium-density development and human scale; the heritage terraces were seen as local icons. Participants did not want to see more dense development in the area."

A key concern of the PPPS is the misalignment of findings from the Engagement Report with proposals. As with any community consultation, the purpose of the Engagement Report is to be a tool to guide the outcomes and priorities of the PPPS and implementation of its 10 Directions. However, through thorough analysis I am of the opinion that the solutions proposed in the PPPS are in contradiction with the results presented in the Engagement Report.This opinion is reiterated by the community in following extract from the Engagement Report: *"There were concerns that the results of the consultation process are not always respected in the area, to the detriment of the community's quality of life.".*

The Engagement Report has consistently highlighted the importance of Direction 2. *"Density and development that complements the area"* has been identified as the *most* frequently raised issue by the community. As such, it can be presumed that Direction 2 should take utmost priority as a guidance factor when designing built form. The community has been abundantly clear with its rejection of high-rise buildings, tower structures, large developments or similar proposals which has remained a controversial subject for years. Nonetheless, the PPPS has demonstrated a blatant refusal to acknowledge the most important issue via its proposal of various tower structures with heights ranging from RL60 - RL180 throughout the generally medium height morphology of the peninsula.

In the context of the below quote extracts, tower structures are by nature a direct contradiction to: human scale, medium-density, village feel and heritage terraces.

"Respondents praised the area's village feel, particularly its low density, its mixed-use precincts and its housing diversity."

"Respondents' key concerns centred on large developments, particularly those involving high-rise buildings and high density living"

"Definitely no more high rise development."

Recommendation 1 - Align with community engagement findings

It is recommended that the PPPS align its proposals to findings from the Engagement Report - even if it proves to be a challenge for how the strategy for Pyrmont can be implemented. In this instance, there is a clear direction for:

- No high rise developments, let alone skyscraper style built form; and
- No high density living.

Alignment of community engagement and design is required to achieve a coherent solution for master plans of this scale. Ignored community engagement will inevitably lead to a fractured Pyrmont community of the future and likely higher development costs from project delays.

Finding 2: Sensible and innovative approach to growth and density

"Embracing a sensible approach to growth will see more change, including taller buildings in Blackwattle Bay, Ultimo and the southern part of Darling Island and parts of Tumbalong Park…"

A sensible approach

The PPPS has often tried to justify the proposed incongruous tower forms as a solution to achieving "good growth" for the future of Sydney. For various reasons, a proposal for tower buildings in Pyrmont can not be considered a "sensible" approach,

considering its inherent insensitivity to the existing context of Pyrmont. Whilst it is recognised that Pyrmont has a real opportunity for growth, the community is convinced that unfortunately it has been used as an ingenuine excuse for passing through private developers' profit strategies. A sensible approach to growth should be achieved via a density policy with strategic linkages to demographic and economic growth, employment creation and productivity.

Urban planning experts around the world have suggested mid-rise for the best quality of correspondence between the human scale and the development of density of the city.

A call for innovation design solutions

There is no doubt that tower structures are a quick and easy solution to achieving density. However this is not considered good design and certainly does not represent Pyrmont to be a place of innovation and technology as the PPPS has outlined in its vision. The PPPS should embody the innovation described and therefore encourage innovative design solutions in the strategies and building forms proposed. Higher densities do not always have to necessitate tall buildings, particularly where a well-considered, design-led approach is taken. Considering Pyrmont has been cited as "Australia's most densely populated suburb", a careful and innovative approach to increasing density is fundamental to the successful future of Pyrmont.

Recommendation 2 - Innovative solutions to density

It is recommended that the design team explore alternative and more innovative approaches to achieving density without introducing incompatible tower buildings. Pyrmont should be striving to become a model for excellent urban planning rather than another example of failed urban sprawl.

It is also recommended that the design team reflect some of the 'Urban Innovations' published by Sidewalk Labs (subsidiary of Google) for some inspiration on what the PPPS could implement for Pyrmont. This level of innovation and design calibre is synonymous with the PPPS's vision for Pyrmont representing a place for innovation.

Urban innovations include strategies for:

- Mobility
- Public Real
- Buildings and Housing
- Sustainability; and
- Digital Innovation

A copy of this document can be found here: https://storage.googleapis.com/sidewalk-toronto-ca/wp-content/uploads/2019/06/23135715/MIDP_Volume2.pdf

Planning our urban future for the impact of COVID-19

Understandably the draft PPPS has not been allowed sufficient time to respond to the abrupt changes the Covid-19 pandemic has imposed on the globe. However, in light of sensible growth, it is expected that future versions of the PPPS should consider shifts in the built environment and urban planning. As history has demonstrated, pandemics have always triggered evolution in architecture and city planning. By way of example, the spanish flu, tuberculosis, typhoid and polio prompted urban planning, waste management, single-use zoning and emphasised sterility in the 20th century.

It is apparent that Covid-19 will - and is already having - a similarly profound impact on the built environment of today. In a similar fashion, the notion of "normal" urban life is being disrupted by the current pandemic. Telecommuting has been embraced to adapt to this sudden change. The reality is that there is likely going to be a steep decline in demand for large office real estate. With many global organisations maintaining work-from-home policies for the foreseeable future in response, the PPPS must remain flexible in reflecting this 'new normal'. It is anticipated that the future of the office space will more likely pivot away from large open plan to 'micro-offices' spread across cities and countries. ('Goodbye, Open Office. Hello,

'Dynamic Workplace', Christopher Mims, WSJ, 12 September 2020)

Google being a main tenant in Pyrmont has led the way in allowing employees to work-from-home and already we have witnessed a mass exodus from both San Francisco and New York. Other large hi-tech companies such as Facebook, Uber and Twitter have largely followed suit and have even extended the concept of work-from-home to 'forever'. *"Slater Gordon Solicitors have announced that they will be vacating their London office in September 2020 and that remote working will become the norm for all of their two thousand staff. According to LSH 88% of office workers believe that they could work at least two days a week at home without impacting on their work and mental wellbeing."* (CEBM, The University of Oxford, July 6 2020)

In essence, the requirement of large centralised offices in or near the CBD is quickly becoming outdated and challenged. The PPPS must not be inflexible in its commitment to develop office buildings to suit an expired and conventional model of corporate working. The pandemic has served as an optimum opportunity for large cities around the world, such as the City of Sydney, to improve urban planning and resolve issues inherent to over-populated and dense cities e.g. commuters fatigue, poor work-life-balance, worsening traffic, affordable housing, urban sprawl and aging infrastructure.

Recommendation 3 - Learning from a pandemic and embracing opportunity to evolve

It is also recommended that the future PPPS carefully consider the impacts of Covid-19 on the built environment and urban planning rather than push forward with strategies appropriate for the 'pre-covid' world. With the potential for people spending more time at home for telecommuting and relying on outdoor and green spaces more, my initial recommendations are as follows:

- Further maximise green space and foreshore access, perhaps even considering these as potential co-working or collaboration spaces;
- Prioritise designing multi-purpose open spaces to enable social distancing but also enable community interaction. Although this seems paradoxical, this pandemic has taught us the importance of open public space e.g. plazas, promenades and parks in lieu of roads, office buildings and parking structures.
- Ensure solar access to existing residents in the Pyrmont area is maintained and protected as people are more likely to work from their homes;
- Prioritise quality telecommunications infrastructure;
- Reconsider the need for large office real estate and consider 'micro offices' designed for co-working spaces combined with open air amenity spaces.

The pandemic has provided us with an opportunity to address long overdue urban planning issues. I hope the PPPS will embrace this to ensure a sustainable and future proof masterplan is delivered - this aligns with the direction of "Building now for a sustainable future".

Finding 3: Compromising existing residents

As per the Engagement Report, the general consensus of the community is that the proposed tower developments will be introduced "*to the detriment of the community's quality of life.".*

The following factors are only some examples of how the proposed high-rise towers will compromise the quality of living of existing Pyrmont residents:

- Overshadowing and access to natural light
- Visual quality and disruption of views
- Impact on the bisophere and health
- Worsened traffic conditions
- Strain on existing infrastructure

However, aside from brief mentions of a supposed sun study being conducted, none of these factors have been addressed to date despite probing by the community during webinars.

There is a question as to how stakeholder interests are being prioritised when it comes to the topic of these tower developments. There is a particular concern that the interests of private developers and politics are taking priority over those of local residents. This concern is justified by the PPPS's misalignment with community engagement findings as described in Point 1 above. This understanding is further reinforced by Geoff Gerring's response to this question from the BBP webinar who justified the height of the towers by suggesting it was a "*once in [a hundred year's] opportunity to develop on the waterfront".*

Local residents are the stakeholder group which will be the most severely affected by any proposals which come to fruition. Therefore, any proposal should be assessed for social and health impacts to existing local residents as a priority.

Recommendation 4 - Reprioritise the existing community of Pyrmont

Recommendations to mitigate impact on existing residents include consideration of the following as a minimum:

1. Overshadowing of proposed building form should not only consider existing green spaces but also the homes of neighbouring residents. Built form should not violate the rights of solar access by existing residents. Access to natural light is detrimental to the health of people and studies have shown that lack of natural light has a direct correlation to sick building syndrome. A comprehensive sun study must be conducted for impact to all surrounding residences and the PPPS should strive to maximise solar access rather than achieve the bare minimum standards.
2. Rights of existing residents to visual quality shall not be diminished by replacing views of the water with those of the back of tower buildings. Built forms must add value or complement existing visual quality.
3. Comprehensive studies on existing infrastructure should be conducted in collaboration with relevant bodies (such as Transport for NSW) to determine the impact of increased density on Pyrmont and the key transport nodes / roads. Mitigation factors, including improved infrastructure, should be integral to future iterations of the PPPS. Infrastructure to be reviewed includes but is not limited to:
    a. Healthcare
    b. Schools
    c. Roads and Transport
    d. Public Space
4. Prioritising stakeholders:

Order of draft PPPS priority stakeholders	Recommended order of PPPS priority stakeholders
1. Government 2. Private Developers 3. New Residents 4. General Public 5. Local Residents	1. Local Residents 2. General Public 3. Government 4. New Residents 5. Private Developers

Finding 4: Out of context developments

"Pyrmont contains some of Sydney's most precious heritage…"

Preserving Pyrmont

As already highlighted in the Blackwattle Submission, and echoing the opinion of fellow existing residents, the proposed tower and skyscraper forms are grossly out of context with the "urban village" nature of Pyrmont of the past and today. The Engagement Report reveals that "respondents praised the area's village feel" and the

sense of intimate community that Pyrmont embodies. This unique nature of Pyrmont must be preserved and not be threatened by the imposition of skyscrapers which are clearly only appropriate for the CBD.

Pyrmont morphology is primarily low-rise to medium scale ranging between 5 to 16 stories. Intertwined with the fabric of these medium scale apartment buildings are single storey heritage terrace houses to provide the density required. Therefore, there should be no surprise that there is an outcry from existing residents of Pyrmont in opposition of towers and skyscrapers ranging from 45 to 70 storeys. This equates to an abhorrent 300-500% increase in height from surrounding building form. The PPPS's suggested RL heights set out in "Framework for Key Sites" (page 79) are completely unjustified and unacceptable.

The PPPS often references the intention to protect select heritage conservation areas which primarily consist of low-rise, small scale homes. However, the PPPS is seemingly failing to address the undisputed visual impact of starkly juxtaposed tower structures which will overbear these heritage elements. It is essential that new buildings and developments strive to harmonise with historic ones.

Unclear methodology for derivation of heights

Clarity was sought from both Infrastructure NSW and DPIE on the methodology for how these height planes were derived. In both instances, vague responses were provided and referenced heights guided by the CBD skyline and aviation limits. In the case of Blackwattle Bay, the height of the Anzac Bridge pylons was also referenced, however the 45 storeys proposed for the towers also surpasses these iconic structures (which have a height equivalent of 40 storeys). The collective responses only highlighted the lack of consideration for the immediate site and precinct of Pyrmont. To this date the community is yet to hear a convincing argument for how the heights proposed are appropriate to their sites.

In Webinar 1, David Haseler had commenced the presentation by suggesting the Plan will serve as "an extension to Pyrmont". This statement seems to be contradictory to the resulting proposed design which does not mirror or even gesture to the immediately adjacent architectural fabric dictated by existing buildings. It seems the "extension" to Pyrmont is merely geographical with the design demonstrating very little intention to be part of Pyrmont - rather, an extension of the CBD.

A call for Contextual Design

All built forms proposed should be designed incorporating the values of the wider context of Pyrmont in both a physical (e.g. its site and adjacent built form) and socio-cultural sense (e.g. the history of Pyrmont and its previous uses). New building forms proposed must blend with the existing massing of Pyrmont and should certainly not be setting unprecedented heights and metaphorically 'stick out like a sore thumb'.

Should a tower in Moscow look like one in Dubai? Similarly, should a tower in Pyrmont look like one in Sydney CBD? Design showing such lacking consideration for its immediate surroundings is in essence failed design.

"*A community will benefit from a designer who understands the primacy of urban design in shaping urban housing projects. The scale, mass, and character of the surrounding context must be accounted for—and, ideally, enhanced—with the addition of new buildings" (Patrick Winters, AIA, Designing Density in Today's Urban Environments 09.09.16)*

Recommendation 5 - Podium buildings as solution

It is recommended that proposed built form be reviewed to prioritise harmonising with the existing architecture and morphology of Pyrmont. The maximum height of buildings should be generated from references in the immediate site and not the CBD as this would be inappropriate.

The recommendation is that all new built forms should take on a podium style (low to mid rise of maximum 16 stories) which would provide the following benefits:

1. More efficient ratio of cost of construction vs density achievable;
2. Maximised cost economic efficiency - podiums are cheaper to construct at a $/Rentable Space metric compared to towers which have a higher loss factor;
3. More relatable at a human-scale to mitigate socio-ecological issues which arise from towers;
4. Provides the opportunity to explore the use of more sustainable and innovative construction materials e.g. mass timber construction. (see examples in Appendix C). Mass timber construction has become iconic in representing low carbon developments (aligning with Big Move 4).
5. Less impactful on surrounding existing residential buildings in terms of solar access and quality of views;
6. More harmonised with Pyrmont's existing morphology; and
7. Likely to be less tension between the larger community's interests and the developer's project..

Finding 5: Misalignment of design principles and proposed built form

The following guiding principles have been reiterated throughout both the PPPS and the BBP Plan:

- Enhance foreshore access;
- Protect heritage; and
- Complementing and enhancing the area.

These are all principles which are fundamental to the successful growth of Pyrmont without compromising its identity. However, it is disappointing that there is a blaring disconnect between these words on paper and the design team's translation into built form. In many instances, responses by the project team in webinars have been contradictory and reiterated this disconnection.

Enhance foreshore access

The design team has claimed that "built form is stepped down to the water" to enhance the foreshore. Whilst this would be the most sensible concept to implement, the tower structures proposed for both Blackwattle (RL120-156) and Darling Harbor (RL170) are both skyscraper developments on the water's edge and contradict this statement. In fact, the tower structures dramatically step up from existing buildings adjacent to these sites by approximately 60-100m. To justify the form of these towers via a "step down" where peak height is dictated by the towers itself is invalid. In order to protect the amenity of the water for the public it is essential to make the foreshore not only physically accessible but relatable at a human scale. The only way to achieve this is via open public space and building form that's relatable by pedestrians at street level.

Complementing and enhancing the area

This is a principle that the community has heralded as being one of the most important factors. The Engagement Report communicates the following statistics for Direction 2 (Development that complements or enhances that area):

- Very Important - 63% of participants
- Important or Very Important - 83% of participants

Despite acknowledging this, the PPPS makes conflicting statements such as: "*a range of taller buildings complementing the character and heritage of the area…".* Simply put, skyscraper buildings will physically never complement Pyrmont which is a history rich area that is primarily low to medium rise.

I refer to the precedent set by the Independent Planning Commission on the recently determined Star Casino Redevelopment MP 08_0098 (MOD 13) Project. The proposed towers in the PPPS should be considered within the same len - they do not exercise good design and amenity of the built environment. In a similar argument, the towers

proposed will result in unacceptable built form, including tower(s) of a height which are overly obtrusive and will result in unreasonable and unacceptable impacts with respect to view loss, visual impact, and overshadowing.

Recommendation 6 - Design to the principles

It is recommended that proposed built form be reviewed to reflect this concept of stepping down built form to the water. Heights of buildings should follow a natural fall in the height plane dictated by existing morphology as illustrated in Appendix A diagram A. The benefits of this includes:

1. Maximising the enjoyment of the water by more residents, as opposed to limiting visual benefits to only be enjoyed by future residents of the towers.
2. Mitigation of overshadowing surrounding buildings and maximizing solar access to more residences.
3. Low-medium rise buildings are more relatable at human scale. This is particularly important from a socioecological standpoint.
4. "More, better and activated public spaces" on the foreshore through maximum solar access to pedestrian paths and proposed public spaces. Overshadowing by skyscraper buildings will create pockets of unused, dead spaces.
5. Better harmonisation of proposed built forms with the existing architectural fabric of Pyrmont and its heritage buildings.

Conclusion

This concludes my submission for the Draft Pyrmont Peninsula Place Strategy dated July 2020. Thank you for your time in reviewing this document and I look forward to future versions of the PPPS which I hope and expect will address the concerns and findings by the Pyrmont community.

With respect to my submission, a summary of key points to address are as follows:

1. Remove tower structures and replace with built form sensitive to Pyrmont's existing morphology and architecture.
2. Implement innovative design solutions to achieve growth in a sustainable and health conscious manner that does not involve tower structures. Consideration to be made for urban innovation ideas presented by Sidewalk Labs (as referenced).
3. Review the maximum RL levels and heights proposed by the PPPS and revise to an appropriate height - methodology for derivation to be communicated to stakeholders. For avoidance of doubt, an appropriate height for built form should consider the following as a minimum: existing planning instruments and its original intent, impact of proposed built form on existing residences and spaces, heritage sensitivity, and environmental impacts.
4. The final PPPS should be designed with a reprioritization of key stakeholders in mind.
5. Introduce and prioritize strategy on how key areas for improvement (as defined by the Engagement Report) will be resolved as part of the final PPPS.

Appendix A

Supporting diagrams as referenced within this submission

Diagram A - Height Plane Diagram

This diagram was submitted as part of my BBP submission to demonstrate the disruption to the natural fall of the built form height planes that the Blackwattle Bay towers will bring. A similar concept can be applied to the Darling Harbourside tower proposals. The yellow plane roughly represents the idea of 'stepping down' to the water of Blackwattle Bay.

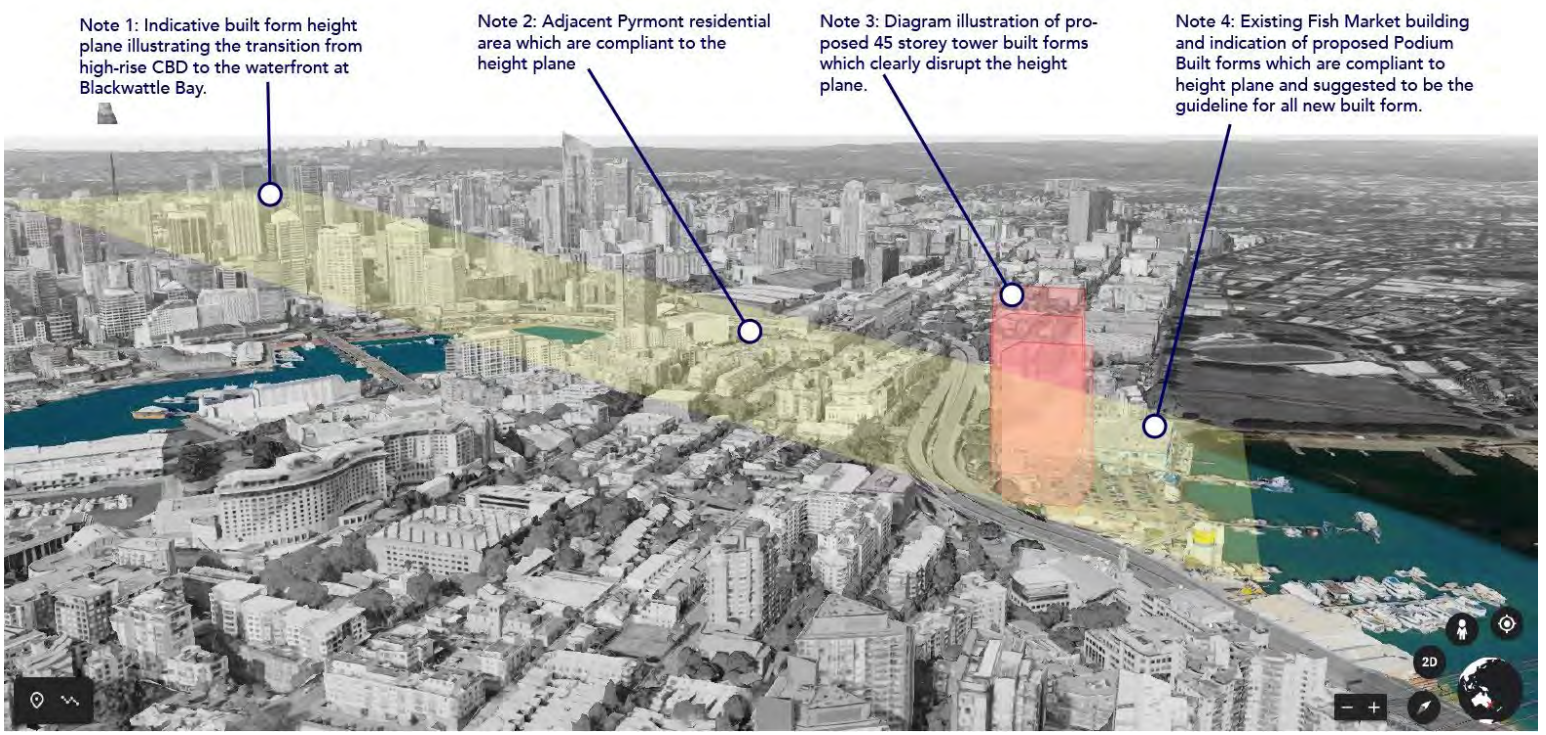
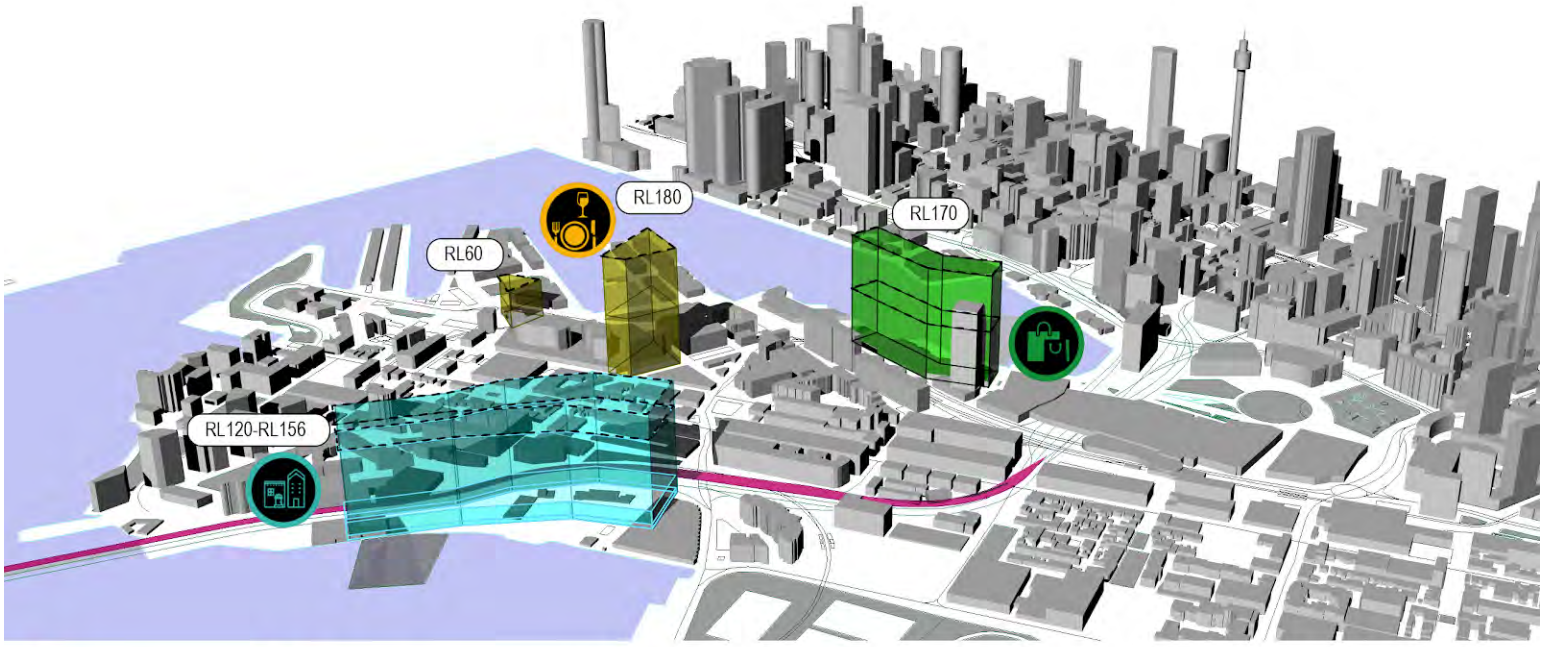


Diagram B - Developments that do not complement or enhance the area of Pyrmont.

This diagram reflects a model of the proposed built form tower heights currently indicated by the PPPS and its impact on Pyrmont. The incongruous nature of these tower proposals are made more obvious in this diagram and clearly do not represent the principle of 'development that complements or enhances that area'. The diagram clearly demonstrates that the heights proposed for these towee forms are more synonymous with the CBD in the background than the low-mid rise morphology of Pyrmont.



Appendix B

Blackwattle Bay Precinct Response submission dated 30-05-20 and submitted to the Infrastructure of NSW ("BBP Submission")

Appendix C - Examples of ideas that could be integrated in the PPPS

Extracts from Sidewalk Labs

The design team is encouraged to review the Urban Innovations presented by Sidewalk Labs for the City of Toronto for inspiration on future versions of the PPPS. The document can be accessed at: https://storage.googleapis.com/sidewalk-toronto-ca/wp-content/uploads/2019/06/23135715/MIDP_Volume2.pdf

Diagram A

Example of mass-timber podium with traversable green space accessible by the public. This would be more appropriate for built form by the water in proposed development areas of the PPPS. (Image courtesy of Google Sidewalk Labs, rendering by Michael Green Architecture)

Diagram B

Illustration of a well designed low-mid rise development that could be implemented in lieu of tower structures. Things to note include:

- Human scale built form
- A blend between built form and public spaces
- Accessible water line that is not overshadowed by towers

(Image courtesy of Google Sidewalk Labs)

171301

Wyatt

Redfern 2016

My comments objecting to this proposal are in the document attached to this submission

SSP Study Blackwattle Bay Submission August 6, 2021

I wish to preface my submission by stating that this process privileges the literate, time rich and English as a first language, participants. The previous webinars and community consultations are the same, as they rely on people being informed, having the time and confidence to be engaged, and the technology to avail themselves of engaging in the process. I note in particular the 410 form letter submissions received and wish to challenge the perception that those who submit them are too lazy to do anything else. Nothing could be further from the truth. Engaging in community consultation involves many implicit assumptions as outlined above – the time to do so, the ability and resources to do so, and the language and communication skills to do so. Not participating is not automatically a measure of apathy or approval of the proposed development, but rather one of complex reasons why people are not able to participate. Whilst the government will no doubt argue that they have done everything possible to engage the community, my above points demonstrate the profound flaws in this process. To adequately address the documents which formulate this SSP requires hours of reading and analysis and sufficient education and communication skills to understand them, again privileging those who have the skill sets, and time, to do so.

I object to the massively inappropriate built forms proposed for Blackwattle Bay, 45 storeys are far too excessive and will dominate the foreshore akin to the gross over development of the Gold Coast high rise strip, in a much smaller area. I particularly wish to register my objections to the astoundingly misleading photo montages of the proposed structures, which appear as ghostly buildings barely discernible in the background of existing location photos. These are outrageously misleading and clearly designed to encourage approval of the proposal, by not clearly showing exactly the bulk, height and dominance these buildings will have. They will most definitely not sit as opaque shadows on the horizon but solid, overwhelming built forms. It is critical that accurate, not misleading, photo montages are put on public exhibition as soon as possible, to replace the current cynical visual exercise in manipulating public approval.

There are many other flawed documents included in this public exhibition. The trip generation assessments are hopelessly outdated from 2017, well before covid19 and the massive change in public movement that has and will bring into the future. The traffic report analyses outcomes from a flawed study that does not include ferry services to the bay, which is breathtaking considering the number of private residences proposed for the redevelopment. In part this is blamed on Infrastructure NSW setting limits like not including PM peak hours being part of the modelling – the issue is why not, rather than simply accepting the profoundly flawed limitations of preceding reports. Consultants have simply accepted this rather than challenging the parameters, leading to a house of cards scenario of new reports built on the gaping holes of previous reports. Noting the grossly inappropriate Barangaroo Casino as a new landmark should not be taken as a precedent for height, foreshore design or anything else, it's deeply offensive phallic form should never have been permitted – and is a result of flawed consultation processes such as this one and a government prioritising developers over residents. The documents are full of completely unfounded and subjective assertions such as the new proposed fish market that "will form a focal termination" point to the bay. In my opinion, that focal termination is a massive overdevelopment, excessive and inappropriate to the site.

To summarise, I object to the overwhelming bulk and height of this foreshore development. In order to maintain public access to, and enjoyment of, harbour foreshores, lower scale buildings are required which do not dominate the public space, cast shadows or create wind tunnels. Surely the Gold Coast skyline is a lesson in what not to do, rather than what to replicate.

Sincerely

Alexa Wyatt

181096

Young

Sydney

Please find attached the Urban Taskforce submission to the Blackwattle Bay SSD study plans.

Urban Taskforce AUSTRALIA

The Urban Taskforce represents Australia's most prominent property developers and equity financiers. We provide a forum for people involved in the development and planning of the urban environments to engage in constructive dialogue with government and the community.

19th August 2021

Department of Planning, Industry and Environment
Blackwattle Bay redevelopment submission
Locked Bag 5022
Parramatta NSW 2124

On-line submission

Re: Blackwattle Bay State Significant Precinct Study

I write regarding *Blackwattle Bay State Significant Precinct Study* prepared by the Infrastructure NSW(INSW) and the accompanying *Explanation of Intended Effect* to (EIE) to amend the corresponding planning instruments.

The Urban Taskforce is supportive of the plans for new a new mixed use precinct as a logical extension to the "established and evolving commercial, residential and entertainment industries that define Pyrmont."

Urban Taskforce welcomes the precinct study as an excellent example of place making. The public open space is generous, and this is made possible by increased height afforded to some of the building sites. The proposed heights are a logical response to the feasibility of a development that will deliver considerable public benefits in terms of foreshore access, public spaces and other community infrastructure.

Notwithstanding this support, the Urban Taskforce is concerned progress on the broader Bays precinct is not progressing at the same rate as Blackwattle Bay. In the interests of maximising community benefits, it is logical for the timing of delivery, for all of the renewal precincts across 'The Bays', to be together.

The Urban Taskforce encourages the Government to be bold in the catchment and the approach in delivering a Strategy for the entire Bays area. Boundaries should seek to maximise development and public domain opportunities (and not be limited to arbitrary lines on a map or State Government controlled land). Such an approach will realise and benefit from the $20Billion investment in the Metro line, the development of the new Sydney Fish Market and the subsequent significant opportunities for public domain and access improvements including harbourfront linkages and crossings.

Logical extensions to the boundaries to be covered by a 'linked' Strategy and approach include modest areas to the north of 'Bays West' and a much larger area to the south of the Bays West to link with the Fishmarkets and Blackwattle Bay. This wholistic and strategic approach will best place industry and Government to

work together to realise The Bays area's full capacity for living, recreation and working.

Accordingly, to provide a more integrated approach which reflects both the proximity and connection afforded by the new and existing Metro stations and recreation, pedestrian linkages, housing and job opportunities, *Urban Taskforce recommends* a linked Strategy and planning approach that incorporates a boundary from the industrial zoned sites north of Robert St, Rozelle and down to the Light Rail Route through Glebe and around to include/join with the Blackwattle Bay Precinct.

The absence of an infrastructure contribution scheme with the Precinct Study and EIE provides no clarity on how the required infrastructure will be funded or delivered. One third of the proposed new floor space at Blackwattle Bay is located on private land. The ambition to complete the proposed harbour foreshore extension and public domain improvements relies on this private development and therefore could impede the delivery. Additionally, Government should be mindful of the Hymix concrete batching plant operations directly adjacent to the Government land that impact the attractiveness of the new homes and offices.

Urban Taskforce recommends that in the setting of levies:

- development feasibility is closely considered and
- opportunities for a broader precinct with a shared infrastructure contributions scheme across the Bays area is explored.

Development across the new and extended precinct should be brought forward to align with that occurring in Blackwattle Bay to enable the planning, funding and early delivery of considerable public domain benefits, particularly those near the Metro - way beyond what is currently anticipated. This would avoid the Government having a new Metro station completed with only modest public domain and community benefit evident, or worse, the perception of a white elephant investment that, once established, is difficult to overcome.

Urban Taskforce recommends precinct planning is accelerated beyond Blackwattle Bay with a view to aligning development delivery and public domain works. An acceleration of development would enable early delivery of public benefits, a strong contribution to the making of a viable "place", and the simultaneous delivery of new commercial, community and residential built form before or as the new metro service is provided.

Urban Taskforce notes the design parameters under the Precinct Study are quite resolved. This approach limits the innovation and creativity that a development partner could bring to the Precinct. Prescribing the mix of uses for each building may limit the attractiveness to a future developer. Precinct scale opportunities including climate resilience and transformation that responds to future technologies are less likely to be achieved given the rigidity of the design requirements.

Accordingly, *Urban Taskforce recommends* amendments to planning instruments avoid being overly prescriptive and instead focus on building envelopes and an open approach to land use.

The economic impacts of the COVID-19 pandemic have given even greater impetus for streamlined, certain development approval and planning processes. A fit for purpose rezoning and assessment process across the Bays area is critical to ensure projects can obtain consent and commence as quickly as possible.

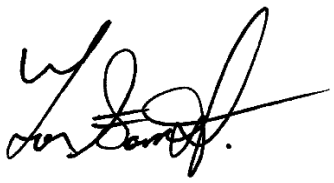
Given that the renewal of the entire Bays precinct is such a significant opportunity for Greater Sydney, and consistent with the planning process for Blackwattle Bay, the *Urban Taskforce recommends* that the entire redevelopment of the Bays area be rezoned via a (State-lead) State Significant Precinct 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.

This assessment pathway for the area will avoid confusion and ensure that the valuable economic opportunity presented is not squandered by local Councils.

Table 1 includes a summary of all Urban Taskforce recommendations

The Urban Taskforce is always willing to work closely with the Government to provide a development industry perspective on proposed policy and planning changes.

Yours sincerely



Tom Forrest
Chief Executive Officer

Table 1:
Summary of Urban Taskforce recommendations

	Urban Taskforce recommendation
1.	To provide a more integrated approach which reflects both the proximity and connection afforded by the new and existing Metro stations and recreation, pedestrian linkages, housing and job opportunities, *Urban Taskforce recommends* a linked Strategy and planning approach that incorporates a boundary from the industrial zoned sites north of Robert St, Rozelle and down to the Light Rail Route through Glebe and around to include/join with the Blackwattle Bay Precinct.
2.	*Urban Taskforce recommends* that in the setting of levies: • development feasibility is closely considered and • opportunities for a broader precinct with a shared infrastructure contributions scheme across the Bays area is explored.
3.	*Urban Taskforce recommends* precinct planning is accelerated beyond Blackwattle Bay with a view to aligning development delivery and public domain works. An acceleration of development would enable early delivery of public benefits, a strong contribution to the making of a viable "place", and the simultaneous delivery of new commercial, community and residential built form before or as the new metro service is provided.
4.	*Urban Taskforce recommends* amendments to planning instruments avoid being overly prescriptive and instead focus on building envelopes and an open approach to land use.
5.	Given that the renewal of the entire Bays precinct is such a significant opportunity for Greater Sydney, and consistent with the planning process for Blackwattle Bay, the *Urban Taskforce recommends* 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.

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Hymix Australia submission to the Blackwattle Bay Precinct SSP attached.

ETHOS URBAN

19 August 2021

To: NSW Department of Planning, Industry and Environment

DRAFT BLACKWATTLE BAY STATE SIGNIFICANT PRECINCT – HYMIX SUBMISSION

This submission has been prepared by Ethos Urban on behalf of Hanson, who currently own and operate (under its subsidiary Hymix) a concrete batching plant located at 45-51 Bank Street, Pyrmont, immediately adjacent the existing Sydney Fish Markets site.

Hanson is supportive of the NSW Government's vision for the Blackwattle Bay Precinct to build an inclusive and iconic waterfront destination comprising a mixed use quarter with new waterfront promenade and public open space to celebrate innovation, diversity and community.

However, as previously advised to Infrastructure NSW, the existing Hymix concrete batching plant is of critical importance to the Hanson/Hymix network, and its ongoing existence has been unacceptably and constantly overlooked.

The continued concrete batching plant operations at the existing Hymix concrete batching plant represents a significant risk to the delivery of the vision and totally undermines the amenity outcomes that will underpin the success of the precinct.

As such, there are a number of matters that need to be taken into consideration by Infrastructure NSW and the Department of Planning, Industry and Environment in the assessment and finalisation of the Blackwattle Bay State Significant Precinct planning process. The sections below highlight these matters further.

The Role of Concrete and the Hymix Batching Plant

Premixed concrete is used in almost all construction projects, including commercial, industrial and residential buildings, schools, hospitals and major infrastructure, such as road, bridge, tunnel, port, airport and rail projects. These types of construction projects are fundamental to economic growth, and a reliable local concrete supply is the foundation of delivering these projects efficiently, affordably and in an environmentally sustainable way.

Concrete batching plants are however required to operate in a flexible manner, responding to the needs of construction design requirements and project delivery programs. Further, concrete batching plants need to be located in close proximity to the areas of demand. Travel time for concrete agitator trucks is critical, as they are transporting wet concrete, which has a very limited shelf life, and are limited in their volume capacity. Major project specifications (including for TfNSW/RMS) can require concrete to be delivered and placed on site within 45 minutes from the time it is batched and mixed with water. More remote locations for batching plants therefore creates unnecessary demands on the local and regional road networks, and delays in delivering batched concrete can lead to a deterioration of the consistency and quality of the concrete.

Ongoing development activity within and around the City of Sydney is expected to continue generating very strong demand for concrete. In addition to the ongoing development activity for commercial, residential and tourism sectors, the NSW Government is currently delivering WestConnex and Sydney Metro City & Southwest, and is planning for the delivery of Sydney Metro West and the Western Harbour Tunnel. Each of these infrastructure projects will generate significant demand for concrete during their delivery phase.

The Hymix Pyrmont concrete batching plant is a critical part of the Hanson / Hymix concrete supply network. To put its importance into context, Hanson / Hymix currently supplies approximately 35% of concrete requirements within

the City of Sydney. This supply network will be further enhanced by the proposed Glebe Island aggregate shipping terminal, which would improve the efficiency and sustainability of aggregate supply to the Hymix Pyrmont concrete batching plant. Given the importance of the Hymix Pyrmont concrete batching plant to Hanson's core business activities, and the lack of similarly located suitable sites, **Hanson does not ever envisage its closure or relocation**.

Planning Outcomes

This statement has been continuously and constantly expressed in no uncertain terms to Infrastructure NSW (and prior to that Urban Growth NSW) since the very first inception of the Bays Market Precinct process, and more recently to the Department of Planning, Industry and Environment as part of the exhibition of the Draft Pyrmont Place Strategy. However, whilst Hanson has repeatedly reiterated this position in relation to ongoing operations of the batching plant, the Blackwattle Bay State Significant Precinct Study appears to have been developed on the basis that the Hymix Pyrmont concrete batching plant will either close or relocate.

To reiterate – any outcome that is premised on the closure or relocation of the Hymix concrete batching plant is untenable for Hanson. **Hanson will never close or relocate the facility to another site**. As such, any strategic planning outcomes that rely on the closure or relocation of the Hymix Pyrmont concrete batching plant will not be achieved.

Importantly, Hanson is not proposing any change to the nature or intensity of the existing concrete batching plant. Hanson simply wishes to continue its operations without new and additional land use conflicts being imposed. With this in mind it is not Hanson's obligation to assess the newly created land use conflict that will arise as a result of the land use densification and intensification under the Blackwattle Bay State Significant Precinct. Rather, it is incumbent on the proponent to evaluate the constraints and opportunities, design the proposal, and then assess the environmental planning impacts that arise as a result of the proposal. As highlighted previously, and further reiterated in this submission, there is a fundamental flaw that has been accepted in the evaluation of constraints in relation to the operational requirements of the Hymix concrete batching plant. This flawed evaluation has undermined every subsequent aspect of the proposal, and we request the Department to not base its assessment of the proposal on this flawed analysis.

It is therefore requested that Infrastructure NSW be required to 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.

Further, it is requested that Infrastructure NSW be required to 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.

Hanson's Future Vision for Hymix Site

Notwithstanding the above, Hanson believes that the concrete batching plant can be transformed into an urban integrated facility that can coexist with the other land uses at Blackwattle Bay in a manner that minimises environmental and amenity impacts, but which maintains into the future the concrete supply capacity critical to support the growing city. Retention of the concrete batching capacity at the Hymix site will also ensure the existing local employment outcomes can be maintained and enhanced, in support of the working harbour.

Hanson's vision for the site is attached, and includes:

- 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.

Environmental Planning Assessment of the Hanson Vision

Based on Hanson's experience and expertise in operating concrete batching plants around the world, we are confident that the Hanson vision can be realised such that the concrete batching plant function can remain whilst also addressing the land use conflict and amenity issues to an acceptable level. It will ultimately be Hanson's responsibility at the time of redevelopment to design a facility that meets the necessary amenity standards. Whilst this is a risk for Hanson, we are confident that it can be achieved. In particular we note that:

- 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.
- Trucks would continue to enter and exit via Bank Street, however these are not new truck movements. 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. they will need to be subject of nose amelioration

Importantly however, it is not Hanson's obligation as part of the rezoning process to undertake an assessment of the newly created land use conflict that will arise as a result of the land use densification and intensification under the Blackwattle Bay State Significant Precinct. The proponent of the rezoning proposal is Infrastructure NSW. It is incumbent on Infrastructure NSW as the proponent to provide the necessary assessment to justify the land use densification and intensification under the Blackwattle Bay State Significant Precinct.

Hanson's proposed integrated facility is an opportunity that we consider will result in substantially better amenity outcomes as well as contributing to the successful delivery of the broader objectives and vision for the precinct. We therefore request that Infrastructure NSW be required to consider this opportunity as part of its rezoning proposal. If Infrastructure NSW chooses not to consider this opportunity, then it remains incumbent on them as the proponent to undertake an assessment of the newly created land use conflict that will arise as a result of their rezoning proposal. It is not reasonable or sufficient to simply wish the Hymix facility away, as they have done.

Key Matters for Consideration for INSW Rezoning Proposal

It is clearly critically important that the planning for the Blackwattle Bay precinct facilitates the redevelopment of the Hymix concrete batching plant site, so as to avoid the land use conflict that would arise from the continued operation of the Hymix Pyrmont concrete batching plant in its current form, which would detrimentally undermine the urban development outcomes being sought for the renewal of Blackwattle Bay.

With consideration of the principles and objectives of the Blackwattle Bay State Significant Precinct rezoning proposal, we highlight the following key factors that should be considered:

- Bulk and scale: There has been 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 sites are contiguous and subject to many of the same underlying constraints. Indeed, the Hymix site is less constrained by the solar height plane in terms of overshadowing Wentworth Park and the Glebe foreshore. It is therefore requested that the Department require Infrastructure NSW to justify, from a land use and planning perspective, why it is appropriate to differentiate the Hymix site and the former fish markets site in terms of bulk and scale of the built form. Infrastructure NSW should be required to distribute built form throughout the precinct in accordance with the underlying constraints and the key urban design principle that were established and endorsed by the Blackwattle Bay Precinct Planning Working Group and stakeholders in 2018.

- Land Use Zones: 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. Noting that Hymix would continue to enjoy 'existing use rights' for its operation, we still consider that it is inappropriate and a poor planning outcome to prohibit a use that is clearly and definitively going to continue into the long term – undermining the objectives of the zone and amenity outcomes for the entire precinct. Hanson would be satisfied if the rezoning simply included the concrete batching plant as an 'additional permissible use', as is commonly provided for under Schedule 1 of the Principal Local Environmental Plan – Standard Instrument. This would enable a future development application for an integrated facility to be submitted and determined. It would be incumbent on Hanson at the time of this development application to be able to demonstrate that appropriate amenity standards are achieved through design and mitigation measures (if required) Alternatively, the Department has recently exhibited a range of new zones for employment lands. It would be appropriate in this circumstance to implement the proposed new SP4 Local Enterprise Zone.
- Height: It is imperative that the proposed redevelopment of the Hymix site into an integrated facility is viable. This can be supported by maximising the height of the future towers in accordance with the constraints and relevant urban design principles. The Hanson vision for the Hymix site has been based on building heights that do not overshadow the Glebe Island foreshore and Wentworth Park, being the key urban design principle that were established and endorsed by the Blackwattle Bay Precinct Planning Working Group and stakeholders in 2018. Basing the development potential of the Hymix site on this key agreed design objective would allow buildings greater in height than what is envisaged in the Blackwattle Bay State Significant Precinct Study, but are critical to ensuring the vision can be achieved.
- Floor Space: The Blackwattle Bay State Significant Precinct rezoning proposal proposes a maximum floor space of 32,450m^2 for the Hymix site, achieving a Floor Space Ratio of approximately 3.57:1. Hanson's proposed buildings, which are consistent with the key urban design principles that were established and endorsed by the Blackwattle Bay Precinct Planning Working Group and stakeholders in 2018, would accommodate approximately 39,360m^2 at a Floor Space Ratio of approximately 4.33:1.
- Mix of Uses: We note the intention as set out in the 'Site Specific Provisions' for minimum employment floor space to be imposed. 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%. We note that the redevelopment of the Hymix site will facilitate the retention of significant employment floor space – being the redeveloped concrete batching plant within the basement and podium of the integrated facility. However, we highlight that the location of commercial office floor space needs to be carefully tested, especially where it is located a significant distance away from public transport and the main attractors of the precinct. In particular, commercial land uses generally require larger floorplates and need significant pre-commitment in order to deliver. In this case, we are concerned that an over-emphasis of commercial office floor space at the Hymix site could undermine the viability of the redevelopment of the Hymix site. Facilitating future residential land uses within the towers on the Hymix site are therefore critical to ensuring that the redevelopment of the site is viable.

Conclusion

In summary, lower building heights and reduced floor space development yield would represent a missed opportunity for better urban renewal of the Blackwattle Bay precinct. Redevelopment of the Hymix site in accordance with Hanson's vision would better respond to the strategic direction for new housing and jobs within a '30-minute city'. Hanson's position in relation to the Hymix Pyrmont concrete batching plant site has always been clear:

- The proposed redevelopment outcomes for the site must enable the continuation of concrete batching activities.
- The proposed redevelopment should provide the economic incentive for Hanson to invest in the development of an urban integrated facility that can operate 24/7 and coexist with new surrounding land uses including public waterfront access, housing, and commercial uses.

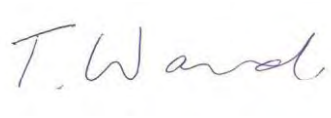
It is therefore requested that the Blackwattle Bay State Significant Precinct rezoning proposal:

- Acknowledge the critically important role of the Hymix concrete batching plant as a sustainable concrete production facility servicing the building industry in and around the Sydney CBD, which will remain in operation in its current form unless it is redeveloped a part of an urban integrated facility.
- Facilitate the redevelopment of the Hymix Site into an urban integrated facility, with height and floor space provisions that reflect Hanson's vision for the site, and which will ultimately contribute to the delivery of the vision for the precinct.
- Ensure that the provisions provide an economic incentive for Hanson to make the significant capital expenditure investment required to deliver the integrated facility, be maximising future residential land uses within the towers, taking into account the overall floor space provision and land use mix.

If the Blackwattle Bay State Significant Precinct rezoning proposal is not amended per the above recommendations, then the Department should require Infrastructure NSW as the proponent to provide the necessary assessment to justify the land use densification and intensification under the Blackwattle Bay State Significant Precinct Study, and in particular to undertake an assessment of the newly created land use conflict that will arise as a result of their rezoning proposal.

We would welcome the opportunity to continue to work collaboratively with the Department of Planning, Industry and Environment in order to achieve a place-based urban renewal outcome that also reflects and responds to Hymix's operational requirements. Should you have any queries about this matter, please do not hesitate to contact me on 02 9956 6962 or at tward@ethosurban.com.

Yours sincerely,



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