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Via email: [REDACTED]

Dear Mr Gerring,

I am writing to update you on the Department's preliminary assessment of the Blackwattle Bay State Significant Precinct Study (SSP Study) and to acknowledge the extensive work Infrastructure NSW (INSW) has undertaken in preparing the rezoning package.

As you are aware, 2,409 submissions were received during the exhibition period for the SSP Study. The submissions identified a broad range of matters which have been grouped into 5 key themes: built form, place, environment, planning and process, and movement. The Department's analysis of the submissions have been documented in a Summary of Submissions Report (Submissions Report) that was recently provided to INSW. The purpose of the Submissions Report is to help inform the key matters raised during exhibition that require further investigation by INSW.

The Department has also undertaken a preliminary assessment of the SSP Study. This has been informed by an Urban Design peer review of the SSP master plan, input from the NSW Government Architect and matters raised by the Project Working Group (PWG). The Department's assessment reaffirmed many of the key issues raised in submissions, with the key issues identified as relating to built form, the foreshore promenade and open space.

The Department's preliminary assessment of the SSP Study is provided at Attachment A. This document is intended to assist with INSW's preparation of its response to submissions and to inform amendments to the master plan and SSP Study. The document references the issues raised in the Submissions Report under the same key themes. It also provides specific recommendations regarding the actions and evidence required to ensure the final SSP Study submitted by INSW can be progressed to the determination stage.

The Department recognises INSW's challenge in resolving all issues that have been identified through the public exhibition and the Department's preliminary assessment. INSW is encouraged to continue to utilise the PWG, which includes representatives of the City of Sydney, Transport for NSW, and Office of the Government Architect NSW, to obtain feedback on the necessary investigations and to inform amendments to the SSP Study.

Finally, I note that neither the Submissions Report, nor the Department's assessment of the SSP Study, include any post exhibition feedback from the Project Review Panel (PRP). Prior to finalising the response to submissions and final SSP Study, INSW will be required to present its key responses and any proposed amendments to the Panel for their review and advice.

If you have any more questions, please contact David McNamara, Director Eastern District, City of Sydney at the Department of Planning, Industry and Environment on [REDACTED]

Yours sincerely

A handwritten signature in blue ink, appearing to read 'M. McDonald', is positioned above the typed name.

2 December 2021

Malcolm McDonald
Executive Director, Eastern Harbour City
Greater Sydney, Place and Infrastructure

Encl:
Attachment A - Summary of Issues and Recommendations
Attachment B - Urban Design Peer Review by Hassell

BLACKWATTLE BAY SSP

SUMMARY OF ISSUES AND RECOMMENDATION

PRIMARY CONSIDERATIONS

These are matters which may require significant amendments to the proposal and may require a structural reorganising of the proposal.

Built Form

1.1 Height and Building Massing

Issues

A significant number of submissions identified concerns with building height and building massing together with associated amenity impacts including, solar access to open space, foreshore promenade and visual impact. Submissions also identified concerns regarding air quality and noise impacts in relation to the proposed residential dwellings and whether appropriate amenity standards detailed in guidelines could still be achieved.

Preliminary assessment of the proposal has identified a range of matters which require further investigation by INSW.

In the Department's view, the proposed built form unreasonably impacts on the quality and amenity of the open space and foreshore promenade. In particular, the properties north of the Miller Street alignment, with their narrow, south-west facing allotments curtailed by the Western Distributor, have significant limitations in being able to realise meaningful public space whilst enabling renewal of these sites. See also section 2.1 Foreshore Promenade for further advice.

The proposed built form in the properties north of the Miller Street alignment creates a series of buildings with continuous height of approximately RL90, with a 10m setback from the water's edge. This does not allow for a proper transition to the waterfront as envisaged in the Pyrmont Peninsula Place Strategy (PPPS). Development should step down towards the foreshore to ensure that a high amenity foreshore promenade is delivered. The proposed building heights in the precinct should respond to the existing and future built form.

The minimum proposed setback from the waterfront is 10 metres supplemented by a colonnade of 7 metres deep with a clear height of 5.8 metres providing for dining or retail uses. These dimensions apply along a significant length of the waterfront (in excess of 200 metres), not simply a short transitional space, and are compounded by significant adjacent heights (RL65 to RL91.5). This does not provide sufficient publicly accessible space, or the generous experience expected of a world class harbour foreshore.

In addition, the proposed podium setbacks of 3-5 metres are unlikely to be effective in mitigating wind downwash from towers, particularly in the vicinity of the foreshore promenade. Concern is also raised in relation to the minimal building separation which may not be capable of achieving alignment with the Apartment Design Guide (ADG) for the proposed residential towers.

The Department's preliminary assessment has identified that the existing Hymix concrete batching plant and the Anzac Bridge/Western Distributor traffic may not provide an environment conducive to residential use due to noise and air quality impacts in the northern sites. There are further amenity concerns regarding potential future ADG non-compliant building separation and solar access resulting from the proposed massing, orientation and building type of some of the residential towers.

The proximity of some of the building envelopes to the Western Distributor may be problematic for achieving reasonable residential amenity. Many of these same building envelopes have a site orientation which limits opportunities for future development to achieve full alignment with solar access provisions of the ADG.

It is acknowledged that further testing and/or improvement of ADG alignment, setbacks, land use and built form typology of development on the private sites comes with challenges for the viability of these sites being redeveloped, particularly in the short term. These challenges warrant consideration of alternate approaches to the building massing for the private sites such as site amalgamation(s) or reconfiguration.

Recommendation

The proposed heights on the existing Sydney Fish Markets and southern part of the Precinct are generally consistent with the PPPS height strategy. The sites north of Miller Street require a better resolution of foreshore and amenity issues, which will require changes to the proposal. These changes should be informed by further investigation and testing which is to include but not be limited to the following:

- Investigate alternate built form options and undertake testing of alternate site configurations, in particular for the narrower northern end of the precinct to provide a better foreshore promenade experience (See section 2.1 Foreshore Promenade for further advice). This should include master planning of one or more of the privately owned sites based on different lot configuration of one or more allotments, requiring amalgamation of sites to provide more lot configurations that better respond to the constraints of this part of the precinct. This should also include an improved transition to the waterfront including the use of podiums and increased setbacks from the water edge.
- Consider the height transition from Miller St and what benefits / challenges this delivers if heights were reduced. This should include testing of heights as low as RL52 at the Bank Street Park interface stepping up to RL 90 at the north side of the Miller Street alignment. This combined with any potential site amalgamation or reconfiguration would need to be carefully managed to ensure that a 'wall' of buildings is not created along the foreshore. To the south side of the Miller Street alignment maximum heights are to be controlled by the Sun Access Plane protecting sun access to Wentworth Park between 10am and 2pm and capped at the Obstacle Limitation Surface of RL156.
- Provide further justification of the proposed colonnade height and depth, demonstrating that this will result in a sufficiently open and well-proportioned component of the foreshore promenade. Consider the potential benefits of increasing the clear height of the colonnade from 6 up to 9 metres.
- Consider if more feasible development can be achieved by adopting more innovative design approaches for buildings at the northern end of the precinct, adjacent to the

Western Distributor motorway, whilst addressing the issues raised in this section and Section 2.1 Foreshore Promenade. Engagement with other stakeholders including other parts of government and private land owners should be undertaken throughout the investigation process.

- Demonstrate the ability to achieve alignment with ADG, including building separation and solar access for both future residential uses within the site and existing surrounding residential flat buildings.
- Adopt design refinements or provide further justification for the siting and design of residential components of the proposed rezoning to address amenity concerns, especially in the northern end of the precinct where development abuts the Western Distributor. This could include non-residential land uses and a minimum setback of 3m from the western distributor at podium and 6m at tower levels.

Place

2.1 Foreshore Promenade

Issue

Community submissions commented on the importance of the qualities of the foreshore as an open space for passive recreation and the need for the promenade to provide for active transport. Delivery of a world class harbour foreshore walk is one of five 'big moves' proposed by the Pyrmont Peninsula Place Strategy to unlock the potential of the Peninsula and is a key ambition required to be delivered by the redevelopment of the Blackwattle Bay SSP. Through its preliminary assessment, the Department is concerned this objective of a world class promenade would not be achieved by the exhibited proposal.

Site constraints including south-westerly orientation and narrow individual privately held allotments at the northern end of the precinct create challenges for the delivery of a meaningful high amenity foreshore promenade.

This has resulted in a compromised foreshore promenade at the narrower, northern end of the precinct. Preliminary assessment indicates:

- That the proposed 17-metre promenade width would not deliver the necessary quality and amenity of space to provide for the extent of uses required; and
- That the approach of developing building envelopes to fit within the existing site ownership boundaries appears to be a limiting factor.

These sites include privately owned lands critical to unlocking the continuous foreshore walk. These are narrow sites, currently proposed to accommodate a 10m foreshore promenade and a 7m colonnade. The preliminary assessment considers the proportions proposed would not deliver the public amenity and place outcomes expected by the community and required for the successful delivery of the precinct.

Further design options need to be investigated to ensure a foreshore promenade of sufficient width along the private land frontages such as a minimum width of 16-20m with an adjacent colonnade of 6-7m. This may involve further limiting these sites already constrained development potential or alternative approaches to design and master planning such as site

amalgamation / reconfiguration and/or designing the promenade to partly extend over the water.

Recommendation

- The foreshore promenade should include opportunities for:
 - Movement – people walking along the foreshore;
 - Dwelling – people sitting and relaxing;
 - Dining / activation – people eating and shopping along the front of buildings adjacent to the foreshore promenade.
- Investigate development of options for wider foreshore promenade at the narrower, northern end of the precinct – increasing from the 17m in the exhibition scheme.
- Consider foreshore promenade widths of 16-20m width with an adjacent colonnade of 6-7m. (See Section 1.1 Built Form for further advice on built form amendments to be investigated in this location to support these changes).
- Undertake further investigations into alternative for foreshore access (boardwalks in the water) in the event that the northern sites do not develop in the short to medium term.

2.2 Public Open Space

Issue

Community submissions identified concerns regarding overshadowing of open space and public spaces and amount of open space. This issue was also mentioned in Council's submission stating development will result in public spaces lacking in sunlight with poor wind environments

Preliminary assessment identifies the importance of delivering high quality open space whilst ensuring a reasonable degree of development potential on the site.

The PPPS sets an objective to establish and maintain a network of high quality, diverse and restorative public open spaces which enhance the overall experience of the Peninsula, are inclusive, accessible and safe, and cater for active and passive recreation and social interaction. These spaces are expected to reduce the urban heat island effect and improve the local microclimate, achieve an overall target of 40% tree canopy on public and private land and deliver green walking and cycling links.

The Blackwattle Bay SSP includes a contribution of 30% or approximately 3ha of the site area as open space, however, the space does not achieve the City of Sydney consideration for sun access of 4 continuous hours to 50% of the open space area. Due to the south-west site orientation the precinct is also subject to wind impacts further reducing the comfort level of park users.

New open spaces should achieve superior solar access based on the intended purpose of the space, not simply the minimum 4 hours required by the PPPS. Options to further improve solar access to new open spaces must be fully explored including changes in the scale of built form or a reconfiguration of the open spaces. Open space typology must match the solar conditions that will be provided i.e. grassed areas require at least 4 hours sunlight.

Recommendation

- Provide more detailed analysis beyond the winter solstice ensuring that the precinct provides spaces capable of supporting lawn and planted areas.
- Investigate alternate site and building envelope configurations which improve solar access to open spaces. Open spaces are to be contiguous, connected open spaces that achieve the programming intentions of the PPPS including spaces for major events and visitors, walking and cycling links particularly the foreshore promenade, and sport, exercise, recreation and relaxation spaces for workers and resident. This could include testing a reduction in height for BLD 02 to improve solar access to the open space.
- Investigate the proposed elliptical building (BLD 07) to improve greater quantum and connectivity of open space. This could include either the deletion of the building and relocation of uses into other locations throughout the precinct, or amendments to the built form such as location, size and scale.
- Undertake further testing to consider and/or demonstrate:
 - Ability to deliver a minimum of 3ha of public open space. This should include testing of a 1ha open space area capable of achieving greater than 4 hours of continuous sun access between 9am and 3pm throughout the year.
 - Ability to deliver 40% canopy cover across the SSP (requiring 2 hours of continuous sun access throughout the year).
 - Whether a reduction in the width of the current proposed Waterside park to allow for an increase in the eastern adjacent buildings could result in an improved public domain across the precinct through provision of a more continuous scaled space terminating in a larger park at the south (larger park subject to adopting changes to scale of BLD 07 as noted above).
 - Provide further solar access analysis of the foreshore promenade and open spaces throughout the year including times outside of 9am and 3pm and not only at the winter solstice
- Consider amending built form to ensure solar access to adjoining public open space.

SECONDARY MATTERS

These matters are primarily technical matters which may not result in significant reorganisation of the proposal but will require changes to approach and/or further analysis to inform the assessment.

Built Form

1.2 Land Use Mix

Issue

Submissions raised concerns regarding the amount of residential floor space and the mix of commercial floor space.

City of Sydney Council's (Council) submission outlines how the proposal fails to give effect to the Eastern City District Plan. It contends the amount of residential undermines the potential of the precinct as the western extension of the Harbour CBD. Council is concerned the proposal fails to deliver on the Blackwattle Bay sub-precinct place priorities by prioritising residential floor space at the expense of a high amenity, highly walkable and safe corridor with a vibrant night-time economy and commercial focus.

Preliminary assessment identifies there is a need to further demonstrate consistency with directions and Place Priorities in the PPPS seeking a focus on “*knowledge-based jobs and supplemented with cultural and entertainment, visitor and tourism, retail and residential uses*” in Blackwattle Bay. (PPPS, p.67) In particular, Direction 1 of the PPPS calls for investment and innovation to boost jobs, creativity, tourism and night life in line with the Eastern City District Plan Innovation Corridor. It also seeks “*delivery of new major floor space capacity on larger sites around the harbour and park edge, within the Blackwattle Bay sub-precinct, through a range of building typologies including taller office towers, where appropriate*” (Pymont Peninsula Place Strategy, p.24).

The commercial tenancies proposed in the SSP masterplan provide large floorplate commercial and retail floor space in podium levels only and the SSP Study does not detail why this departure from the PPPS is warranted.

Recommendation

- Land use mix including the potential for major commercial towers should be aligned to the PPPS Economic Development Strategy and future expectations for development in the Peninsula and Eastern City as a whole. Provide further analysis of demand for proposed types of commercial floor space and how this aligns with the PPPS commercial land uses focussed on knowledge-based jobs including consideration for appropriateness of taller office towers.

Place

2.3 Connecting with Country

Issue

Public submissions have identified a need to carry forward the recommendations of the Aboriginal Cultural Engagement Report into the proposed planning framework.

Preliminary assessment confirms the need to address the recommendations from the Aboriginal Cultural Engagement Report consistent with the Designing with Country framework.

Recommendation

Identify opportunities to incorporate recommendations of the Murrawin Aboriginal Cultural Advice and Engagement report and how these will be captured throughout the renewal of the precinct.

Environment

3.1 Sustainability

Issue

Submissions raised concerns regarding lack of sustainability measures for the precinct. Further to this Council's submission contended the EIE and draft Design Guide are inconsistent with and/or lack any commitment to the four sustainability inventions and performance criteria outlined in the PPPS. Council's submission also made comments relating to a range of specific matters including Water Sensitive Urban Design, Water and Energy Targets, Net Zero and multi-utility hubs.

The SSP Study and draft planning controls include a proposed LEP provision requiring the consent authority to have regard to the principles of sustainable development. However, this is only as they relate to development based on a 'whole of building' approach as well as sustainability targets within the draft Design Code. Preliminary assessment indicates that the sustainability provision and targets, while supported, are not as ambitious as the targets included in the PPPS and are absent of specific mechanisms applied on a precinct scale.

Water Sensitive Urban Design

The proposal includes concept level references to Water Sensitive Urban Design (WSUD) and incorporates a target for 100% recycled water use for public open space. Other precinct-scale sustainability measures, such as precinct-scale stormwater detention and reuse, have not been included in the proposal.

Water and Energy Targets

The NABERS and beyond BASIX commitment included in the SSP study are supported. However, the energy and water targets outlined in the PPPS Sustainability Report are higher than the Blackwattle Bay SSP Study.

Net Zero and Multi-Utility Hubs

Sustainability ambitions for the precinct set out in the draft Design Code and EIE indicate 100% net zero carbon emissions by 2050, which is consistent with the relevant policies including the PPPS and the City's Net Zero Building Strategy targets. The Ecologically Sustainable Development report includes a range of opportunities to achieve these target's but the SSP Study and proposed masterplan do not address these opportunities. Further to this the PPPS identifies investigation of 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* as a place priority for Blackwattle Bay. (PPPS, p.67) INSW have not addressed this opportunity in the masterplan or SSP Study.

Recommendation

- Further investigate how precinct scale sustainable outcomes, such as multi-utility hubs can be implemented through the masterplan and planning framework to deliver the nominated targets for Energy and Water efficiency.
- Update the EIE and Design Code to require future buildings to achieve the minimum energy and water targets (including relevant NABERS and beyond BASIX commitments) outlined in the PPPS Sustainability Report.
- Provide details of such precinct-scale stormwater detention and reuse.

3.2 Wind Conditions

Issue

Submissions were received which objected to the wind impacts associated with tall buildings, including the effects of wind on the amenity of the public domain.

Preliminary assessment indicates that major roads do not meet walking criteria and the wind assessment throughout the precinct is based on the walking criteria only, not standing or sitting criteria. This is unlikely to promote the desired place character or range of land uses. The wind assessment needs to consider the desired quality of spaces being created and the

intended uses of these spaces. It will require the application of a combination of standing, sitting and walking criteria across the precinct, dependant on the sorts of public domain being proposed.

Recommendation

The wind assessment is to be revised to ensure application of appropriate criteria and analysis of the modelled wind conditions resulting from the proposal, to inform if the wind conditions achieved will support the expected use of areas of public domain, e.g. sitting, standing, walking. This needs to include identifying areas appropriate for sitting within new open spaces and along new streets. Built form amendments may be required where the proposal is unable to achieve the criteria for sitting, standing or walking. Design interventions such as covers or awnings may not be appropriate as a universal solution and their use requires design justification in all circumstances.

Planning and Process

4.1 Design Excellence

Issue

Submissions raised design as an issue including concerns regarding the provisions for design excellence or design competitions and comments regarding the design aesthetic of the proposed built form.

The proposed design excellence approach seeks to disapply the City of Sydney's LEP provisions and adopt bespoke provisions to run a process mirroring the City's competitive design process or the NSW Government Architect's State Design Review Panel. Given that Council's approach is already in place across the broader City of Sydney LGA, the starting point of any assessment should be that Council's approach continue to apply to future development within the Precinct.

Recommendation

Provide further justification, including addressing the issues raised in submissions, for the disapplication of Sydney LEP 2012 Design Excellence Clause. If this justification cannot be supported the existing SLEP Design excellence provisions should be adopted.

4.2 Infrastructure Contributions

Issue

Submissions identified the need for local and State infrastructure planning and the Council's submission expressed the importance to align infrastructure planning with the holistic infrastructure delivery plan for Pyrmont Peninsula.

Preliminary assessment indicates that the infrastructure, public open space and community facilities proposed by INSW do not yet sufficiently align with infrastructure opportunities expected to be delivered in the Blackwattle Bay Key Site by the PPPS.

It is acknowledged that the NSW Government has been undertaking a review of the contributions approach, which includes reforms to:

- develop a stronger funding base for state and regional infrastructure
- make the system more consistent, transparent and easy to navigate

- better align infrastructure contributions and strategic planning and delivery.

The new contributions system will introduce a Regional Infrastructure Contribution (RIC) framework that will replace the Special Infrastructure Contributions framework. The RIC will provide funding towards critical state and regional infrastructure, including in Pyrmont through a state infrastructure contribution levied on new development across Greater Sydney. The RIC will consist of a:

- low, broad-based charge (per dwelling for residential and per square metre gross floor area for commercial, industrial and retail development)
- strategic biodiversity charge for development on biodiversity-certified land (where applicable)
- transport project component (to support investments such as the new Pyrmont Metro Station).

Infrastructure investment will be aligned with land use planning and forecast growth applying a place-based focus to determine regional infrastructure needs in each region. This includes ensuring the right infrastructure proposals are developed and delivered at the right time to support the development of liveable, productive, and sustainable communities.

Contribution rates for local infrastructure and a State Infrastructure Contributions framework are expected to be exhibited later this month as part of the PPPS with the RIC currently on exhibition indicating that a base contribution rate will apply to the site in addition to any transport project component.

Recommendation

- Note contributions for the local infrastructure and state and regional infrastructure will be payable at the updated rate.
- Pursue infrastructure contributions aligned with the PPPS including implementation of a multi-utility hub and provide justification where PPPS infrastructure opportunities have not been adopted.
- Update the SSP Study to note the proposed Glebe Island Bridge active transport link is being investigated by TfNSW.
- Revise the infrastructure delivery plan to respond to the SIC framework which is expected to be exhibited later this month as part of the PPPS and the RIC currently on exhibition

4.3 Planning Framework

Issue

Complexity of Planning Framework (including State Significant Development)

Council's submission identifies the inconsistency with Direction 4 of the PPPS to establish a unified planning framework and does not support:

- The removal of Clause 6.21(5) from the Sydney LEP 2012;
- Nomination of Blackwattle Bay as a Public Authority Precinct within the ISEPP so that certain works in the public domain carried out by public authorities such as landscaping, public art and children's playgrounds, can be undertaken as exempt development;

- Continued and extension of the SRD SEPP to allow development in Blackwattle Bay with a CIV over \$10 million to be designated as State Significant Development; and
- Adjusting the State Significant Development Site Map – Bays Precinct to reflect the boundary of the new Sydney Fish Market site within the SRD SEPP.

Preliminary assessment finds there is a need to demonstrate consistency with the Direction in the PPPS and the Greater Sydney Commission's (GSC) review of the Pyrmont Peninsula. This includes the findings that the complexity and uncertainty of the existing planning framework (including the vision) generates inconsistency in the application of development standards and principles for development. This is amplified by overlapping state and local approval processes.

The proposed planning framework is inconsistent with the GSC review as it does not deliver a streamlined, user-friendly planning approach. Instead, it consists of a complex layering of planning controls including proposed application of special provisions under State Environmental Planning Policy (Infrastructure) 2007, State Environmental Planning Policy (State and Regional Development) 2011 and State Environmental Planning Policy (Exempt and Complying Development Codes) 2008. This is compounded by the proposed disapplication of certain provisions of the Sydney LEP 2012.

The amendment to the SRD SEPP map to reflect the boundary of the new Sydney Fish Market requires further clarification and justification. The Department also notes the new Sydney Fish Market is currently under construction and that there may be challenges with rezoning land that may be subject to ongoing approvals or planning applications.

The EIE proposes to nominate the precinct as a major event site under the Codes SEPP allowing *community and commercial events to be undertaken in certain state significant precincts as exempt development*. (Blackwattle Bay SSP, EIE, p.13) This provision applies in precincts including the Rocks and Barangaroo but is not a provision applying consistently to all foreshore parks and it is considered that further justification for this provision is required to exclude the reasonable possibility of typical development approval processes applying.

The EIE proposes to nominate the precinct as a public authority precinct subject to Part 3, Division 11, Clauses 58G-58H of the ISEPP to enable public authorities to undertake certain works as exempt development within identified 'public authority precincts' such as development of play equipment and landscaping. As with nomination under the Codes SEPP, this proposed drafting is considered to complicate the planning framework and it is not clear why typical development application processes should not apply or which public authorities would be undertaking the work.

Recommendation

- Further justification required regarding the need for 'public authority precinct' provisions in the Infrastructure SEPP and appropriateness of the proposed exemption from DA requirements for major events.
- Further justify amending the SRD SEPP map to include the new Sydney Fish Market (noting the SSD consent has been issued) and for continued inclusion of the remainder of the precinct.
- The SSP Study is also to further investigate whether the rezoning of the land adjacent to and surrounding the Sydney Fish Market creates issues with any

existing / forthcoming planning approvals required to support delivery of the new Sydney Fish Markets.

4.4 Social and Affordable Housing

Issue

Submissions from the community raised concerns regarding the lack of affordable housing in the precinct. Many requested an increase beyond the proposed 5% of residential floor space or noted general concerns regarding lack of social and affordable housing.

A submission from community housing provider, identified challenges in delivery of affordable housing and that the precinct should identify a clear pathway for delivery of affordable housing including the dedication of land for an affordable housing development.

Preliminary assessment has identified that a range of local and strategic policies for provision of affordable housing apply to the precinct.

The Eastern City District Plan identifies an affordable rental housing target of 5-10% of new residential floor space subject to viability. The Revised City West Affordable Housing Program for Ultimo-Pyrmont requires 0.8% of the total floor area of residential uses and 1.1% of the total floor area for non-residential uses. However, the City of Sydney Local Housing Strategy (LHS) advocates for NSW Government to deliver a minimum 25 per cent of floor space as affordable rental housing in perpetuity on all NSW Government sites, including on social housing sites. Following conditional approval of the LHS, the objective to achieve 25% affordable housing for government sites remains in the LHS and has been endorsed by DPIE. Further to this, Council's LSPS states that 10% or more of this affordable housing to be provided as culturally appropriate housing for Aboriginal and Torres Strait Islander people.

Direction #9 of the PPPS identifies the need for the unified planning framework for the Peninsula to reconcile the revised City West Affordable Housing Program with the City of Sydney's affordable housing approach. In the absence of this clarification, it is considered that the District Plan presents the clearest ambition, and that the precinct should provide between 5-10% of residential floor area as affordable housing, subject to viability.

Recommendation

- Provide further justification that the proposal meets the Eastern City District Plan target for affordable rental housing of 5-10% subject to viability.
- Identify pathway for delivery of affordable housing and whether the precinct should dedicate land for an affordable housing development.

1. Movement

5.1 Public Transport

Issue

Submissions were received raising concerns with existing and future public transport modes. In particular, submissions noted that the announced Metro station at Pyrmont would improve

the existing constrained movement network but may present challenges for connection with the precinct.

TfNSW has previously provided advice on opportunities for public transport including for Light Rail to be a key factor in delivering the proposed 53% public transport mode share.

Preliminary assessment indicates that the TMAP should include consideration of the capacity of existing and planned light rail and bus services to support planning for pedestrian connections between public transport stops and key destinations.

Provision of new ferry wharves (including use of wharves or overnight ferry berthing) suitable for low-wash ferry vessels is supported.

Recommendation

- Provide additional detail of pedestrian access paths to light rail and locations for wayfinding features and include appropriate provisions in the Design Code.
- Include appropriate provisions in the Design Code establishing a process for developers to work with TfNSW to resolve detailed requirements to enable future ferry provision at concept DA stage.
- Include appropriate provisions in the Design Code establishing a process for developers to work with TfNSW to resolve detailed requirements to ensure the most effective connectivity between public transport modes.

5.2 Freight Servicing

Issue

TfNSW has raised the issue of freight and servicing noting that the number of trips generated by similar residential developments warrants provision of parking to facilitate freight and servicing. Without this provision, place qualities will be impacted through introduction of multiple basement entries or on-street parking in the public domain.

Freight servicing is predicted by TfNSW to account for 835 vehicle arrivals per day (18-20% of traffic activity). TfNSW notes that this has not been addressed in the TMAP. More specifically, they recommend a single basement for site 2 (the existing fish market site) to provide for a loading dock servicing residential and commercial uses.

Recommendation

- Address servicing for commercial and residential towers in the masterplan noting that the development is expected to generate 835 freight vehicle arrivals.
- Consider and explore need for a combined loading dock, including necessary provisions within the draft Design Code.

5.3 Traffic

Issue

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

The TMAP does not clearly identify if the traffic modelling approach used to assess the impact of the proposal on the road network includes:

- Major transport infrastructure including WestConnex, future Metro West Pyrmont Station, western harbour tunnel and beaches link; and
- Uplift in employment and residential land use and densification proposed under Pyrmont Peninsula Place Strategy and Bays West Strategy.

As identified in the Transport Management and Accessibility Plan (TMAP), the mode share target for walking and cycling is set at 29%, public transport at 56% and private vehicle at 15%. The non-private vehicle mode share is considered high for proposed plans for the precinct and preliminary assessment has found insufficient evidence regarding how this will be achieved.

Recommendation

- Provide evidence to demonstrate that measures to place downward pressure on private vehicle mode share and measures to increase active and public transport mode share will enable the target mode share split.
- The TMAP should be updated to identify and confirm modelling and assumptions.

5.4 Parking

Issue

Approximately 14% of submissions commented on parking provisions. These comments included concerns regarding the availability of on-street parking resulting from the new development and impacts related to visitors to the Sydney Fish Market.

It is noted the proposal applies standard parking rates within the City of Sydney LEP. Preliminary assessment has found however that the proposed standard parking rates do not align with the ambitious targeted private vehicle mode share or with the provision of a new city-serving Metro station.

Recommendation

- Provide evidence to demonstrate that measures to place downward pressure on private vehicle mode share and measures to increase active and public transport mode share will enable the target mode share split.
- Benchmark against other precincts such as Barangaroo, Rhodes Peninsula or other precincts with similar mode share targets.
- Provide response to PPPS place priority to provide decoupled parking.

5.5 Pedestrian and Cycle Network

Issue

Approximately 14% of total submissions noted the need for improvements to pedestrian and/or cycle networks.

The TMAP is based on an ambitious mode share target that requires minimal private vehicle use and places emphasis on active and public transport. Preliminary assessment indicates that there is insufficient evidence to demonstrate that the surrounding pedestrian and cycle network provides sufficient capacity to accommodate the expected number of pedestrian and cycle trips, to ensure the safety and comfort of pedestrians and cyclists and to promote desired place outcomes.



Recommendation

- Update the TMAP to identify and confirm that there is sufficient capacity of major pedestrian routes between the precinct, especially the new Sydney Fish Market, and the Pyrmont Metro station.
- Provide additional detail of pedestrian access paths to light rail and locations for wayfinding features and ensure that these features are incorporated into the draft Design Code.

PEER REVIEW - BLACKWATTLE BAY SSP URBAN DESIGN

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INTRODUCTION

The purpose of this review is to provide an urban design peer review of key matters from INSW's Blackwattle Bay State Significant Precinct (BWB SSP) proposal currently being assessed by DPIE.

Background

The NSW Government is revitalising Blackwattle Bay to deliver an authentic, vibrant and sustainable place connected to Sydney's iconic harbour.

Building the new Sydney Fish Market at the head of Blackwattle Bay unlocks an incredible opportunity to return inaccessible parts of the harbour back to the community and provide new homes, jobs, services and green space within walking distance of the CBD.

The NSW Government has designated Blackwattle Bay (formerly Bays Market District) as a State Significant Precinct (SSP) because it is an area of State importance and can achieve key government policy objectives, particularly those relating to tourism and delivery of homes and jobs.

Scope

The scope of this report is to provide a peer review of The Blackwattle Bay State Significant Precinct proposal (BWB SSP) to assist the Department of Planning Industry and Environment (DPIE) to assess how the proposal achieves the strategic objectives for the site. The assessment criteria for this work will align with the broader strategic planning framework including:

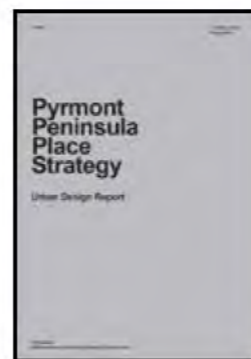
- Greater Sydney Commission Eastern
- City District Plan
- Pyrmont Peninsula Place Strategy (generated by Hassell)
- Better Placed
- Greener Places
- Connecting with Country
- Movement and Place

This review considers two key issues:

- Height strategy review
- Waterfront promenade review

The height strategy review and the waterfront review are supported by an assessment of character and open space, movement, transition, wind, topography, heritage, overshadowing, views, social infrastructure and design excellence.

Documents used in this Review:



(L-R) Blackwattle Bay Precinct Plan - Urban Design Statement Volume I and II by FJMT, Blackwattle Bay State Significant Precinct Study 2021, Pyrmont Peninsula Place Strategy Urban Design Report 2020.

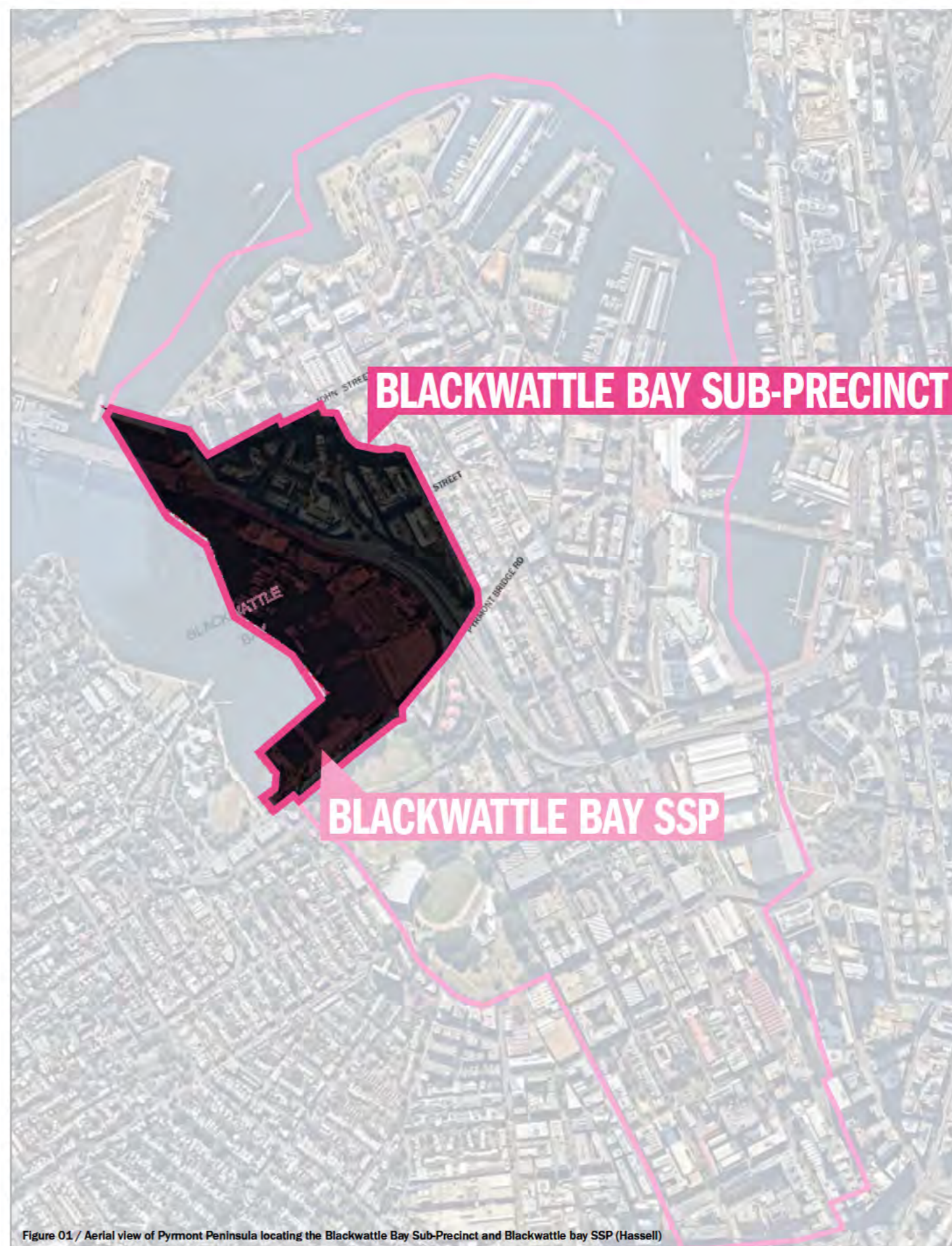


Figure 01 / Aerial view of Pyrmont Peninsula locating the Blackwattle Bay Sub-Precinct and Blackwattle Bay SSP (Hassell)

EXECUTIVE SUMMARY

Blackwattle Bay will transform from industrial and infrastructure to a place attracting 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. Country will be reflected in well-designed public space areas connecting community and history around a new contemporary character. A new Pyrmont Metro station will provide enhanced access to this new urban quarter and entertainment precinct.

Pyrmont Peninsula Place Strategy

The following report provides a peer review of the Blackwattle Bay State Significant Precinct (BWB SSP) proposal currently being considered by the Department. The document has been divided into two sections:

1.1 Waterfront Review

1.2 Height Strategy Review

The peer review has been undertaken in relation to the work completed by Hassell on the Pyrmont Peninsula Place Strategy (PPPS). This peer review also references other relevant strategic documents.

This document aims to analyse areas of alignment between the BWB SSP and the PPPS, and areas of departure. It provides advice on potential opportunities for the site not yet resolved in the proposal.

There are a number of key issues that are addressed in both chapters of this review that relate to the importance of this place, the unique opportunities to create an incredible extension of the Sydney Harbour waterfront, a place of varied activity, a way of living and working, a new destination for Sydney.

The key issues relating to the waterfront promenade include:

- The width and generosity of the foreshore promenade
- Solar access
- Setbacks and building height and bulk affecting the experience of the ground plane.

The issues relating to height include:

- Solar access to future open spaces
- Wind impacts at ground floor
- Bulk and scale directly on the waterfront
- Integration with context

While the proposal delivers a continuous foreshore promenade, it is considered that modifications to the built form and promenade design will improve the delivery of the PPPS objectives.



HEIGHT OPPORTUNITIES

Bay Interface



The bay interface is a key area for recreation, gathering and celebration that relies upon its water setting for civic and sporting events and other water-based activities.

Improving the generosity and experience of the foreshore is critical at Blackwattle Bay which forms part of the Sydney Harbour foreshore walk spanning from The Bays to Woolloomooloo.

The BWB SSP should explore a minimum clear width to the foreshore of 20m recognising:

- Properties north of the Miller Street alignment should explore a 12-16m residential building envelope
- The proposed community centre is substantially reduced in footprint or relocated.

Anzac Bridge Interface



The Anzac Bridge interface considers the transition in height between the foreshore and the sun access plane control zone. The extents of this interface is governed by existing towers at Distillery Hill, and street block depths between Union Street and Pirrama Road. Due to the narrow property width directly on the foreshore, properties north of the Miller Street alignment are not considered part of the transition zone and directly adjacent to the Anzac Bridge Pylon and suspension wires as a result the relevant benchmark height is RL52 at 2 Bowman Street.

The BWB SSP should explore:

- A maximum height of RL52 at the Bank Street Park interface stepping up to RL 90 at the north side of Miller Street Alignment.
- Potentially taller heights to the property south of the Miller Street Alignment where the site depth increases and adequate setbacks can be provided from taller buildings.

Open Space Amenity



Maintaining sunlight to important public places is a critical objective to maximise amenity and enjoyment of the city by the community. The orientation of the waterfront and the structure of the existing proposal with several links create challenges for delivering solar access to the foreshore alongside development.

Orienting public open spaces to the north will maximise solar access and improve open space amenity across the site.

The BWB SSP should explore:

- Orientation of the primary open spaces and key links North/South to maximise potential solar access and minimise extent of overshadowing from taller buildings

Wind



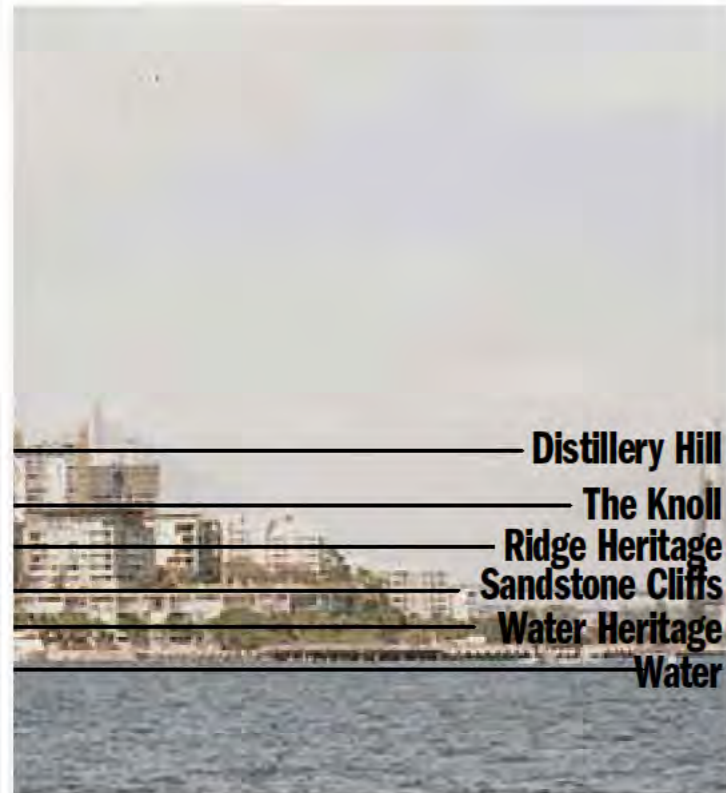
Comfortable wind conditions at the ground plane are critical for supporting safety of pedestrians and cyclists. Comfort at the ground plane also supports activation of building frontages and edges to support outdoor dining, pedestrian seating and the use of podium rooftops. The opportunity to increase setbacks in areas of concern will enable larger built form and reduce the extent of exposed buildings.

The BWB SSP should explore:

- arranging built form to hide within the wind shadow of other taller buildings at the place of greatest impact

HEIGHT OPPORTUNITIES

Topography & Heritage



Pyrmont Peninsula is a place strongly defined by sandstone escarpments left after extensive quarrying. The strong presence of the landscape is layered with history and heritage from Sydney's development. No response to the topography is evident within the proposed design, with the exception of a specific discussion of an eroded form to BLD01. Reference is made to the scale of warehouses along Wattle Street, but not the adjacent heritage items and zones. There is an opportunity for the building form to better relate to the landform and the heights of the sandstone escarpments, such as step buildings.

The BWB SSP should explore:

- Stepping of built form to relate to the scale of sandstone escarpments at the head of the Peninsula.

Adjacent Public Open Space



The impact of new development on existing public open space is a key consideration. The proposal notes a requirement to ensure no new overshadowing to Wentworth Park, Glebe Foreshore or Sydney Secondary College. Minor shaping of the corner site with an increased setback that aligns to the midday sun angle will avoid increased overshadowing in this location.

The BWB SSP should explore:

- Greater setbacks to the East of the SSP lands to minimise loss of solar access to the existing residential properties

Lot Consolidation



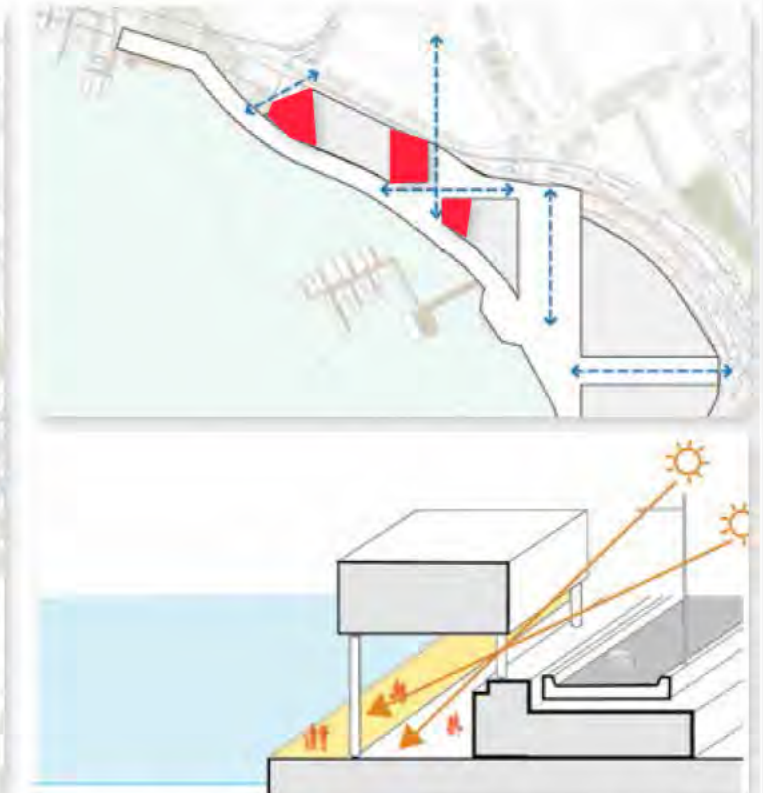
The current proposal includes several through site links with resultant small and constrained building envelopes. These building envelopes do not allow the generosity that would permit adequate articulation to improve amenity through detailed building design. Furthermore, the orientation of the through site links create wind tunnelling and poor solar access at the ground plane.

A consolidation of lots and a reduction in through site links as indicated above will improve internal circulation, amenity, experience at the ground plane and solar access, with a re-orientation of streets north south.

The BWB SSP should explore:

- Amalgamation of properties north of Miller Street and focusing through site links and open space to enable the optimisation of open space and built form.

Waterfront Amenity



The orientation of the Peninsula makes the ability to deliver good solar access alongside development challenging.

In optimising amenity and built form, there is opportunity to explore the building envelopes in section with spaces underneath buildings and a greater separation between podiums and towers to enable solar access.

The BWB SSP should explore:

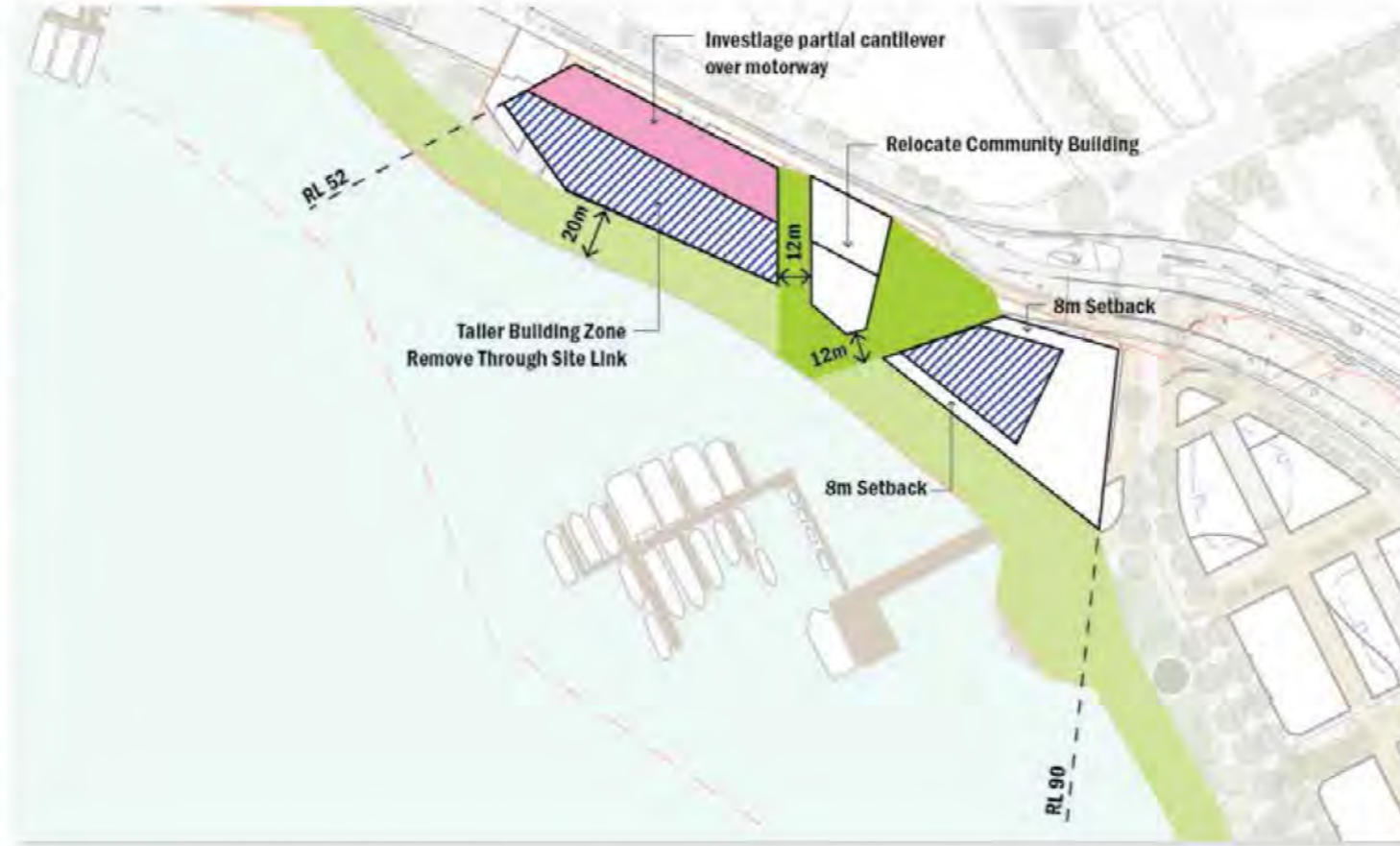
- Separation of towers from podiums to create greater potential for direct solar through built form which may permit buildings coming closer to the water edge over the 20m public promenade.

WATERFRONT OPPORTUNITIES

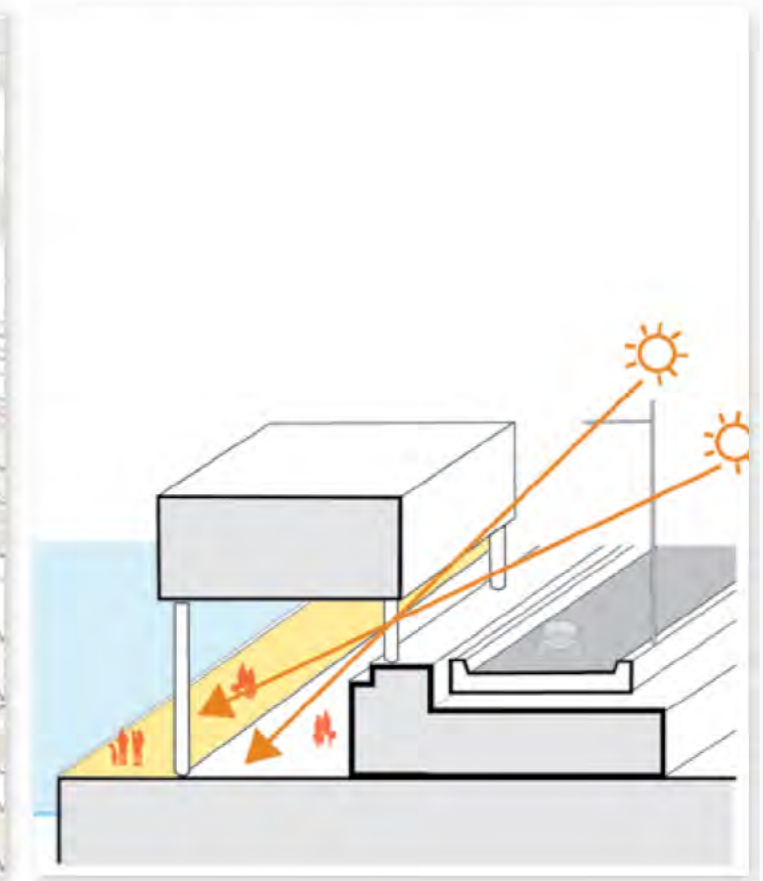
Overall Plan



BWB SSP - Northern Foreshore Walk



Potential Promenade Section



A continuous harbour-edge walk will connect key public spaces, cultural and entertainment destinations, creating spaces for a diversity of users and functions, and allowing people to engage with and appreciate the natural setting of the harbour from Wollomoolloo to the Bays Precinct.

A generous waterfront promenade width is essential for the successful delivery of a range of experiences and uses at the harbour edge. It allows for capacity for outdoor dining, boating activity and allows for free-flowing pedestrian and cyclist movement, avoiding points of high congestion.

The justification in the proposal for reducing the waterfront promenade width to 10m prioritises development over public amenity. A 20m foreshore promenade with an additional 10m

for dining, seating and retail, with a minimum 8m setback to the foreshore can be made possible by a reconfiguration of public open space, a consolidation of developable lots and removal of through site links, as indicated above. This reconfiguration allows for a community building that is not situated within public domain space. It also improves solar amenity to the foreshore promenade and public open spaces.

The opportunity to reconsider built form to enable increased solar access is critical for the protection of amenity at the foreshore promenade.

The section above shows an example of a building form approach that is separated from and cantilevered over the podium to enable light into the ground plane in areas that would otherwise be overshadowed by building height, bulk and scale, noting that issues such as noise, air quality and structural engineering would require consideration. An innovative approach to building design is essential for the protection of public space assets, whilst balancing land use and GFA.

The BWB SSP should explore:

- Consolidation of properties north of Miller Street and focusing through site links and open space to enable the optimisation of open space and built form.
- Provision of a small local open space mid-way along the northern promenade zone to deliver a moment of high amenity mid-way along the zone where the foreshore is constrained and reduce the long unbroken sections of significant overshadowing
- Utilisation of airspace over the motorway to increase site yield for properties north of Miller Street
- Separation of towers from podiums to create greater potential for direct solar through built form which may permit buildings coming closer to the water edge over the 20m public promenade.

PPPS PROPOSED VISION AND EXPERIENCE

Blackwattle Bay Sub-Precinct

Blackwattle Bay will transform from industrial and infrastructure to a place attracting 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.

Country will be reflected in well-designed public space areas connecting community and history around a new contemporary character. A new Pyrmont Metro station will provide enhanced access to this new urban quarter and entertainment precinct. The new Sydney Fish Market will open at the head of Blackwattle Bay in 2024; the redeveloped site will respect Aboriginal history and respond to open spaces, while incorporating new office or residential buildings and better movement networks.

Blackwattle Bay offers the greatest potential for change across the Peninsula. This opening of a large parcel of land for redevelopment, combined with neighbouring smaller privately owned parcels to the north, could deliver a large proportion of the growth forecast across the Peninsula. Current master plan scenarios developed by Infrastructure NSW set out three alternatives for the area's transformation. Significant public domain improvements, including the link between the Harbour Foreshore walk across the Western Harbour to Walsh Bay feature in all scenarios. Private sector investment in the current Network Ten offices could integrate with the redevelopment of the former Sydney Fish Market to improve connectivity and public domain outcomes in the sub-precinct. Future links to the Pyrmont Metro Station would set the scene for this part of the Peninsula to transform into a new urban quarter based around jobs and supporting the cultural and entertainment offerings of the waterfront through a public promenade and event and function uses.

Blackwattle Bay's transformation will focus on public domain and open space improvements, better connections and the right mix of spaces for businesses and customers on the doorstep to a world-class tourist attraction, the new Sydney Fish Market.



Figure 2 / 'Blackwattle Bay At A glance' from Pyrmont Peninsula Place Strategy (DPIE)

Open space that connects



Figure 3 / Sketch noting future key opens spaces highlighting their role in linking between destinations and routes (Hassell)

- Location of future key open spaces to reconcile multiple key routes and connect between destinations.
- Orientation of central public open space between Miller Street and Sydney Fish Markets to maximise solar access throughout the day, link transport interchange to harbour foreshore walk, and future ferry stop and pedestrian link to Elisabeth Healey Reserve.
- Increase connections and permeability across sites and blocked roads.
- Regional parks and gathering spaces connected by continuous foreshore walk.
- Reinforce Sydney's peninsulas street character of streets extending to the waters edge.

An integrated transport interchange

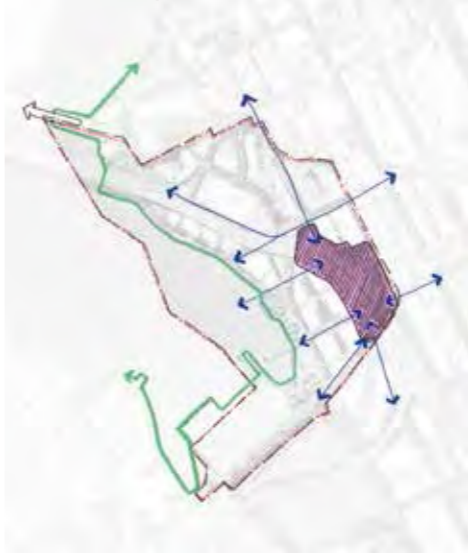


Figure 4 / Sketch highlighting the future transport interchange and key routes (Hassell)

- Creation of a new transport interchange linking the new metro station to surrounding public and active transport including Harris Street transport corridor, Blackwattle Bay Ferry, Inner West Light Rail, foreshore walk, active transport loop and cycle facilities.
- Integration of key routes into interchange to maximise access to and from public and active transport facilities.

Activated and connected harbour foreshore walk

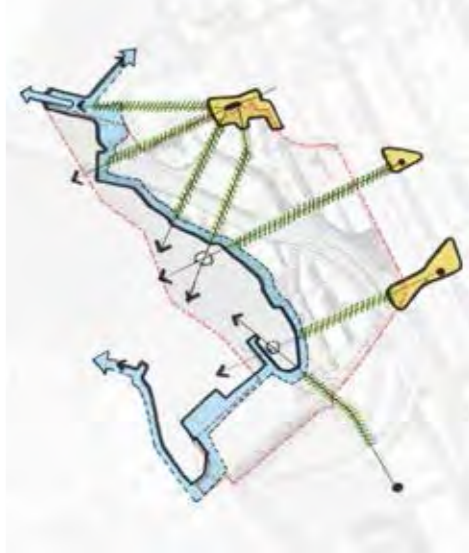


Figure 5 / Sketch highlighting the future foreshore walk and key links from open space at topographic high points (Hassell)

- Deliver a continuous connected foreshore that expands to facilitate gathering and recreation on the waters edge linking open space, local communities and regional destinations.
- Extend street corridors to the waters edge, enhancing a uniquely harbour city experience of streets terminating at the harbour.

BWB SSP PROPOSED VISION AND EXPERIENCE

Blackwattle Bay State Significant Precinct

"Blackwattle Bay offers 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."

The Blackwattle Bay Urban Design Statement provides a wide ranging vision touching upon country, environment and urban context, sustainability and resilience, local identity, innovation corridor, mix of uses, urban structure and connectivity, new street framework, active transport, public domain and open space, harbour, community, built form and landscape.

A regular theme throughout the vision is an emphasis on country, context, heritage, quality and amenity for both the public and private realm.

The vision informs 14 key elements which will deliver the proposed vision and experience being:

- 1 - Waterfront Promenade
- 2 - Open Spaces Linked with the Promenade
- 3 - Pyrmont Grid
- 4 - Historic Foreshore Line
- 5 - Connectivity & Permeability
- 6 - Active Transport
- 7 - View Corridor
- 8 - Landscape & Water Sensitive Urban Design (WSUD)
- 9 - Urban Forest
- 10 - Water Uses
- 11 - Parking & Access
- 12 - Future of Work, Living, Culture and Entertainment
- 13 - Building Orientation and Amenity
- 14 - Staging



Figure 6 / BWB SPP Conceptual Plan of Urban Structure and Open Space of Blackwattle Bay from the Urban Design Statement (INSW)

1.1

WATERFRONT REVIEW

WATERFRONT CONTEXT

Strategic Context

Sydney's waterfront has been a focus for life for millennia. It is an important life sustaining and story telling element; it is world-renowned - the home of the city's iconic Opera House and Harbour Bridge. And, it is a place of many distinct spaces, characters and activities.

The Blackwattle Bay Waterfront is part of Sydney's Global Waterfront which has been defined under the Pymont Peninsula Place Strategy as being the foreshore within the extents of the Harbour CBD.

Increasing public access and ownership of the foreshore is a long term objective of NSW Government's with a key underpinning document being the "Sharing Sydney Harbour Access Plan (2003)" whose vision is to "improve public access to, and enhance the recreational enjoyment of, Sydney Harbour and its tributaries for the people of Sydney and visitors to the city".

Since this time a series of strategies have developed and identified the value of Sydney's central waterfront as key to Sydney's 'Global' identity and international offer including:

- Western Harbour Design Guidelines (SHFA)
- The Harbourline Project (Government Property NSW)
- Eora Journey/Yaranuralla walk (City of Sydney)
- Pymont Peninsula Place Strategy (DPIE)

These successive strategies have developed an increasingly clear understanding of the waterfront potential and articulate a series of

investments and actions under the broad initiatives of:

- walking tracks
- on-road and off-road cycleways
- public domain improvements, e.g. better access ways, promenades, shelters, seating, lighting, signage, planting, interpretive facilities,
- dry-boat and cycle storage
- wharves, jetties and pontoons
- 'soft access' for landing small boats including
- seawall steps and beaches.
- City identity and story telling.

The Blackwattle Bay foreshore must be read in the broad context of these strategies as well as the local context of the future loop that will be realised around Rozelle Bay and Blackwattle Bay once the Glebe Island Bridge is reopened to pedestrian and cycle movement.

The value of these waterfront circuits as destinations for local residents, as well as visitors, is evidenced in local examples of the Bay Run (Canada Bay Council) and Narrabeen Lagoon Trail (Northern Beaches Council).

To deliver on NSW Government's aspirations the PPPS has reviewed the range of strategies as well as historical approvals along the central Sydney waterfront to define certain minimum outcomes which starts with generosity of the public at the waters edge.

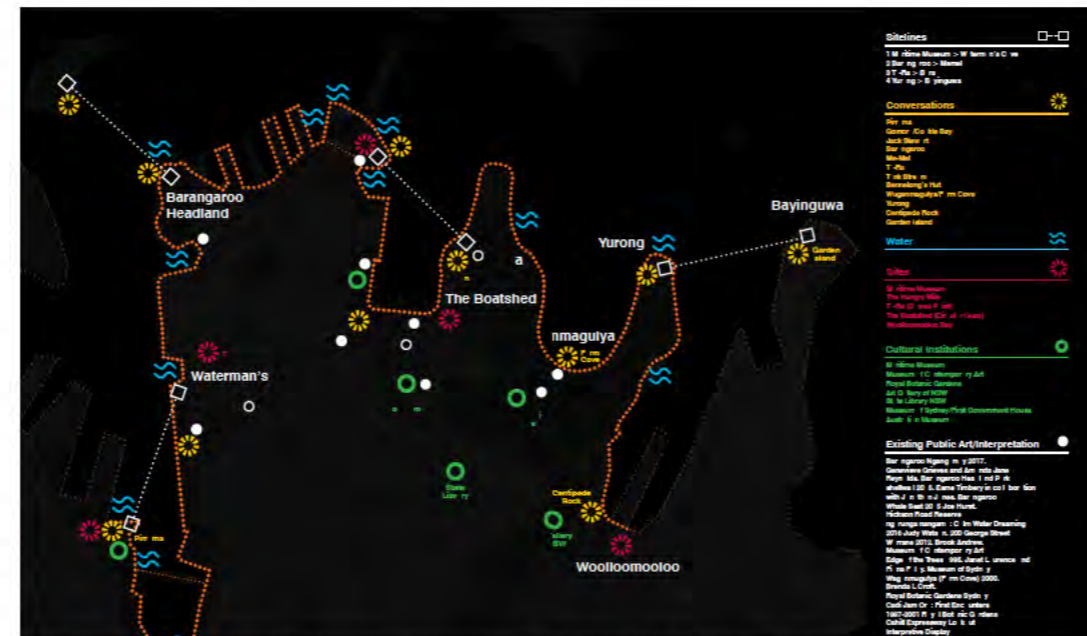


Figure 1.1.1 / Eora Journey, Harbour Walk Storytelling Report, City of Sydney 2018

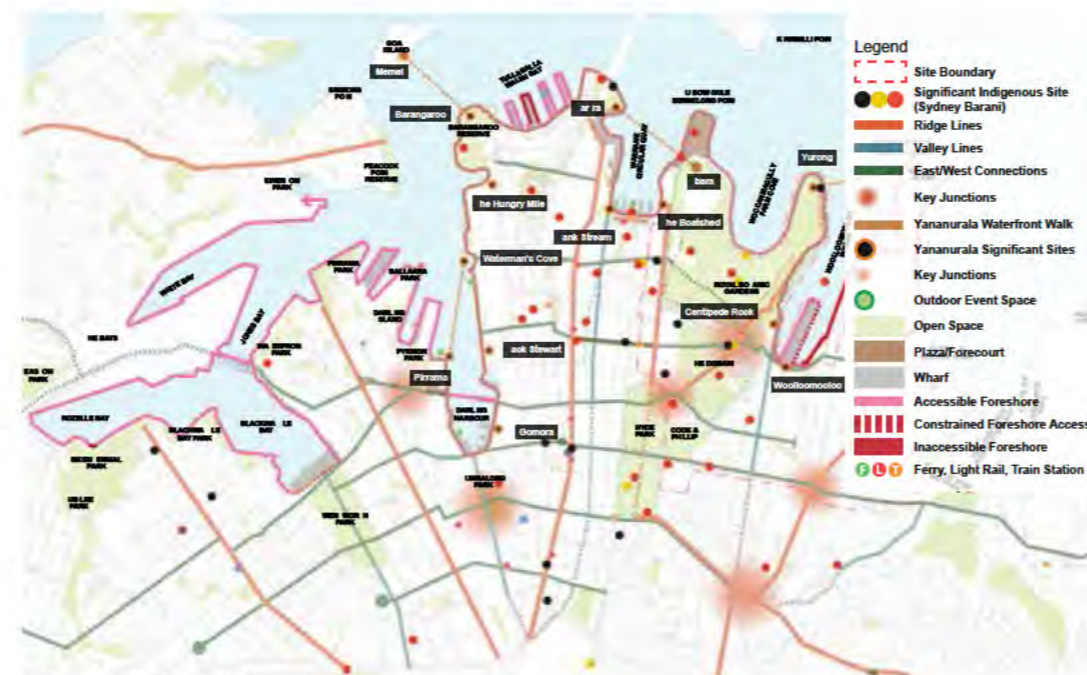


Figure 1.1.2 / Waterfront Connections

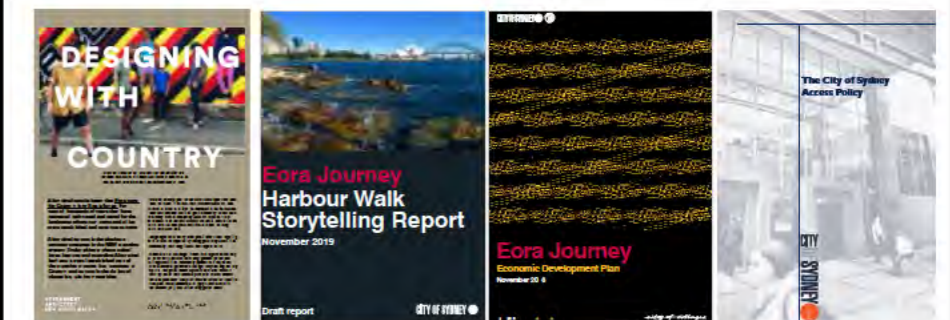


Figure 1.1.3 / State and Local Government Policies relating to open space and water front amenity

WATERFRONT CONTEXT - HARBOUR CBD

Sydney's global waterfront is made up of waterfront regions and catchments, each with their own relationship with the shorelines and waters of the Sydney basin and each offering different experiences.

Within these zones, the Harbour CBD defines the 'Central Waterfront' with Blackwattle Bay SSP being within Pyrmont Peninsula and forming the eastern edge of 'The Bays' which includes Blackwattle Bay, White Bay and Rozelle Bay.

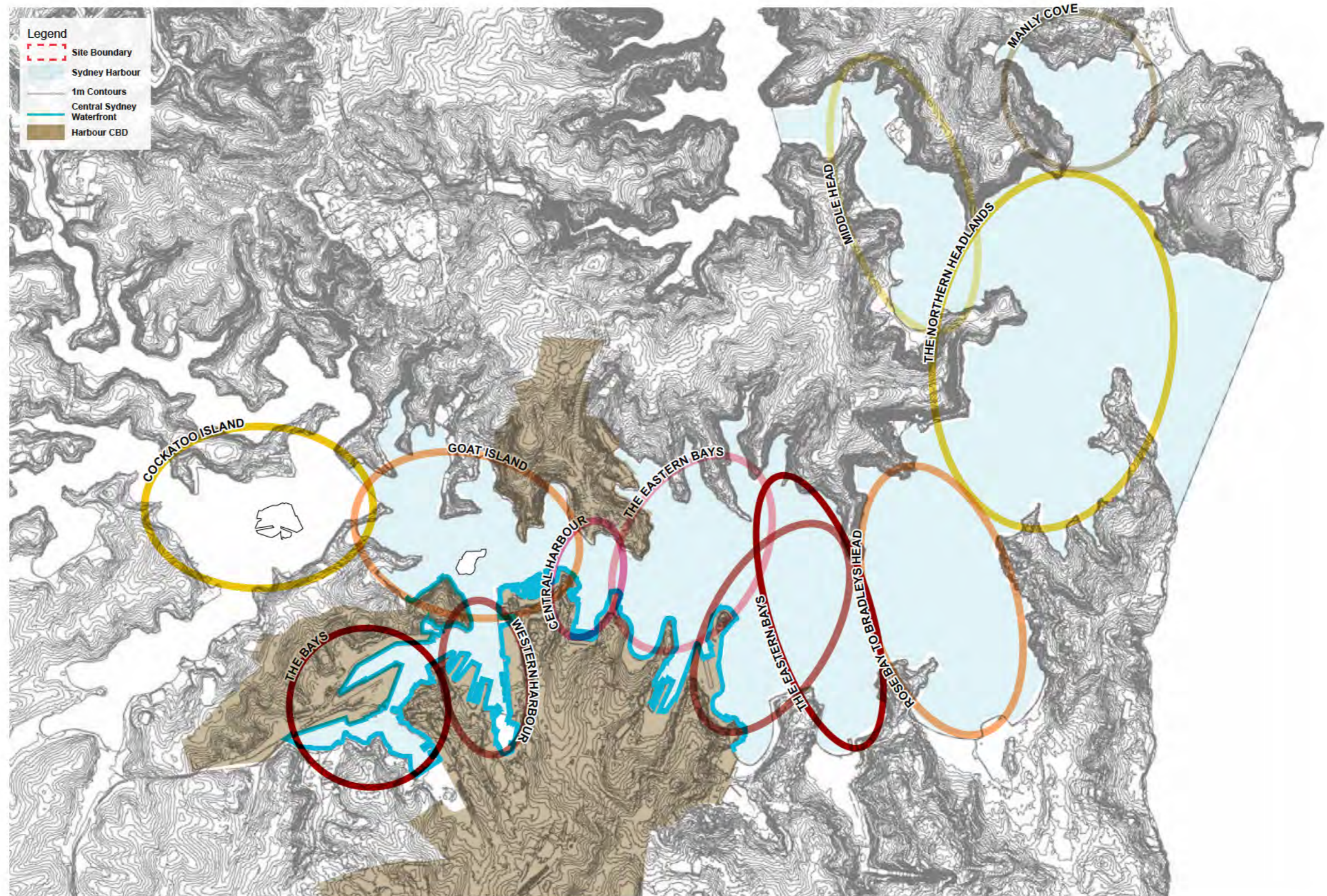


Figure 1.1.4 / Topographic Map of the Harbour CBD and Surrounds noting water zones, Harbour CBD extents and Central Waterfront Extents (Hassell)

WATERFRONT CONTEXT - CENTRAL SYDNEY

The Blackwattle Bay SSP is within the Pymont Peninsula Place Strategy area which identifies the foreshore walk as the first big move which will unlock the potential of the Peninsula.

The Bays is unique amongst the central waterfront spaces as the collection of Bays, with the Glebe Island Bridge, create a continuous loop that could become a local destination for recreation alongside its metropolitan attractors.

The comparatively short distance between banks create a strong visual connection across the water that supports the foreshore potential to be a place of gathering for on-water events.

Blackwattle Bay SSP will directly control the final experience and form of the connected waterfront for the Bays which will contribute to Sydney's local and global identity.

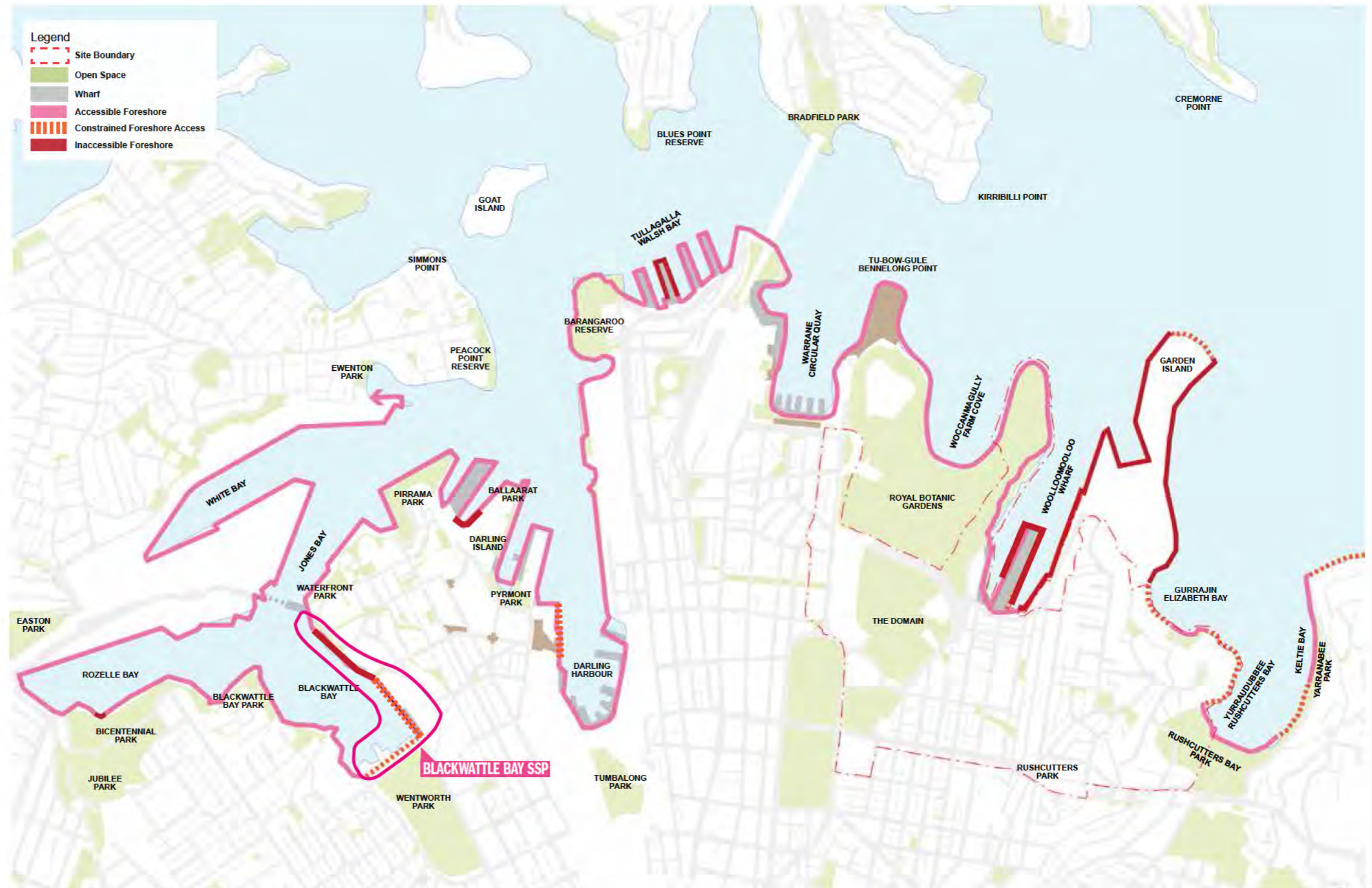


Figure 1.1.5 / Plan of the Central Waterfront Extents noting existing levels of access and open spaces (Hassell)

WATERFRONT CONTEXT - THE BAYS WALK

As a connected waterfront, the future Bays Loop will create a continuous 5km circuit which will connect a range of local and regional open spaces and directly serve communities within a 2.5km catchment being Pyrmont, Ultimo, Balmain, Birchgrove, Lilyfield, Leichhardt, Annandale, Camperdown and Darlingtown.

Indicators of its future potential for the local community can be seen in the Bay Run (7km length - Canada Bay Council) and Narrabeen Lagoon Trail (8.4km length - Northern Beaches Council).

These existing trails are well loved destinations for the local community with the Bay Run regularly noted for overcrowding in constrained sections and seen regular investments by state and local government to upgrade key pinch points.



Figure 1.1.6 / Plan of the The Bays Waterfront noting existing levels of access and open spaces (Hassell)



Figure 1.1.7 / Aerial view of the Bay Run (Google with annotations by Hassell) 7km pedestrian and cycle loop around Iron Cove

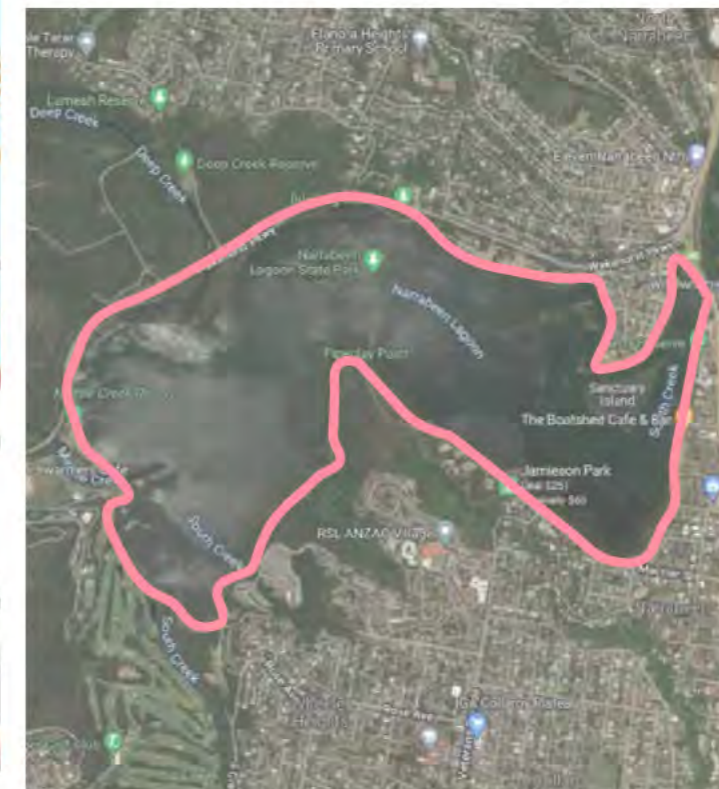


Figure 1.1.8 / Aerial view of Narrabeen Lagoon Trail (Google with annotations by Hassell) 8.6km loop around Narrabeen Lagoon.

WATERFRONT CONTEXT - BENCHMARKS

Barangaroo

There are several benchmarking examples included in the BWB SSP but it is important to consider the surrounding context in relation to width and generosity of the waterfront promenade. Barangaroo is a key example which offers a 30m walkway (excluding the wharves) allowing for a range of day and night activities, food and beverage offering and generous circulation space for pedestrians and cyclists.

Average Width	30m wa kway excluding wharves
Access	Public pedestrian access
Typology	Waterfront promenade with retail at the ground plane and residential above
Composition	<ul style="list-style-type: none">- Concrete promenade with seating and planting- Restaurants and retail opening out onto promenade
Qualities	<ul style="list-style-type: none">- Retail activated with residential and commercial uses- Restaurants at waters edge- West facing

The waterfront promenade at Circular Quay varies across the site with a large 29m width on the western side which allows for steps to the waterfront, outdoor seating and restaurants. The eastern side is more constrained by development and its west-facing aspect, with approximately 5 metres of the 19m width of waterfront promenade being under the colonnade.

Circular Quay West

Average Width	29m
Access	Fully public and semi public restaurant seating areas
Typology	Waterfront promenade with retail at the ground plane within heritage buildings
Composition	<ul style="list-style-type: none">- Small unit paved promenade with steps towards water front intermittently programmed for events- Sunken dining area
Qualities	<ul style="list-style-type: none">- Small restaurants- Steps down to waters edge- Maintains views to landmarks- Centrally located

Circular Quay East

Average Width	19m
Access	Public pedestrian access
Typology	Waterfront promenade with retail at the ground plane and residential above
Composition	<ul style="list-style-type: none">- Large paved area, partially under colonnade
Qualities	<ul style="list-style-type: none">- Activated retail- Access to train and ferry transport- set back from water- west facing- Centrally located



Figure 1.1.9 / View of Barangaroo Waterfront (Google)

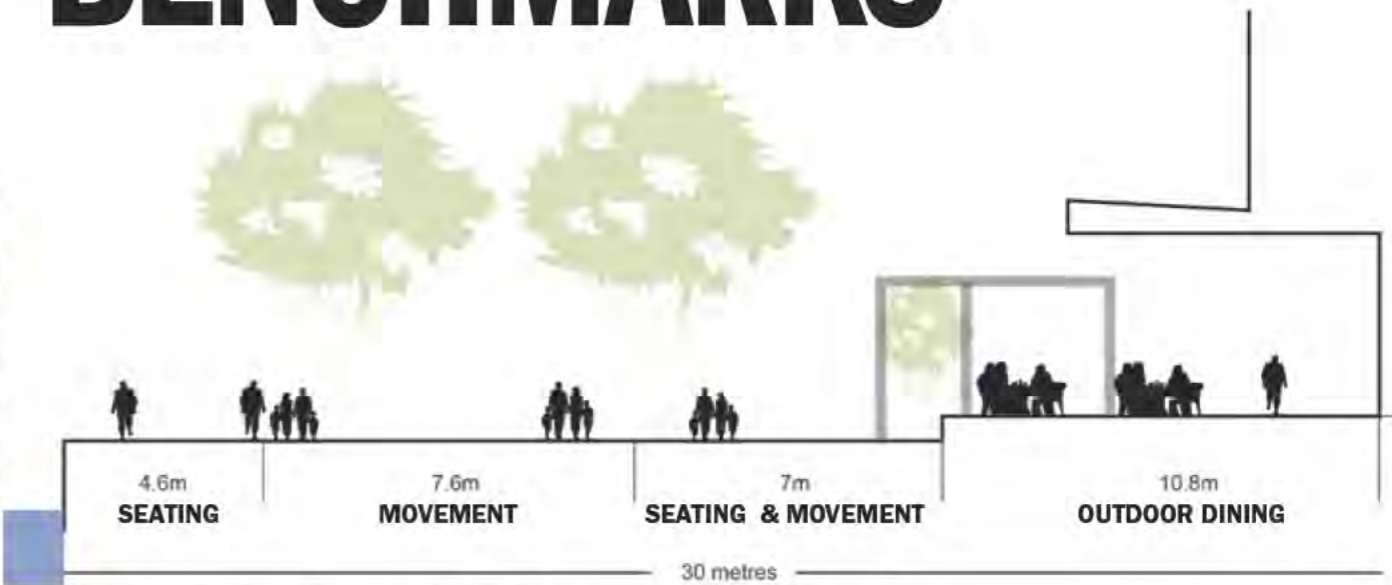


Figure 1.1.10 / Section through Barangaroo Waterfront noting various zones and uses (Hassell)



Figure 1.1.11 / View of Circular Quay West Waterfront (Hassell)

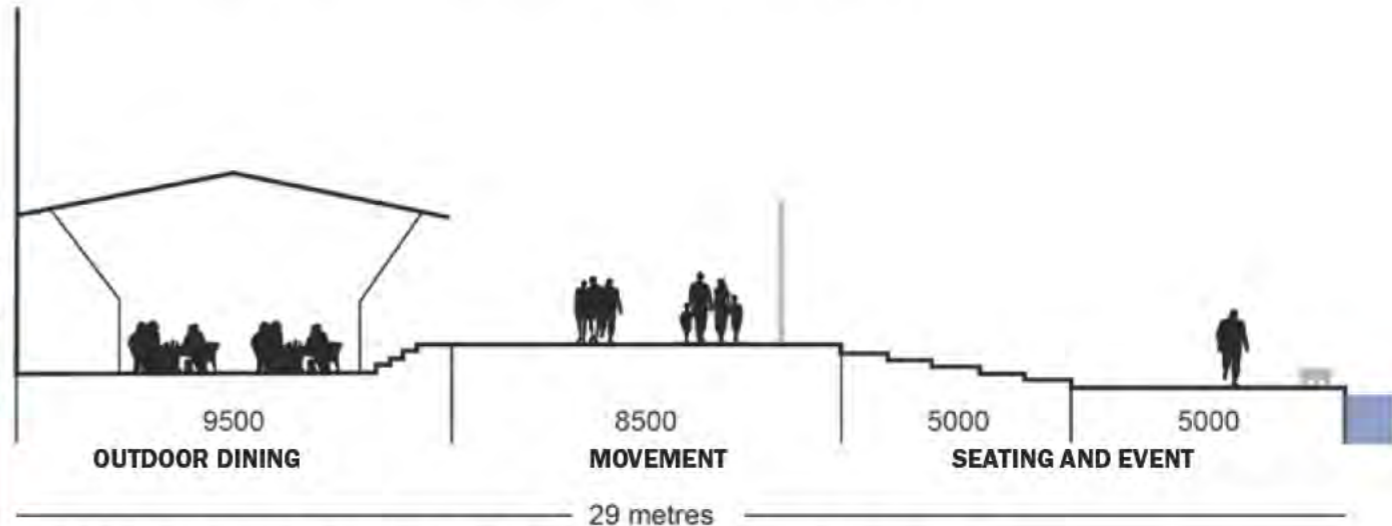


Figure 1.1.12 / Section through Circular Quay West Waterfront noting various zones and uses (Hassell)



Figure 1.1.13 / View of Circular Quay East Waterfront (Hassell)

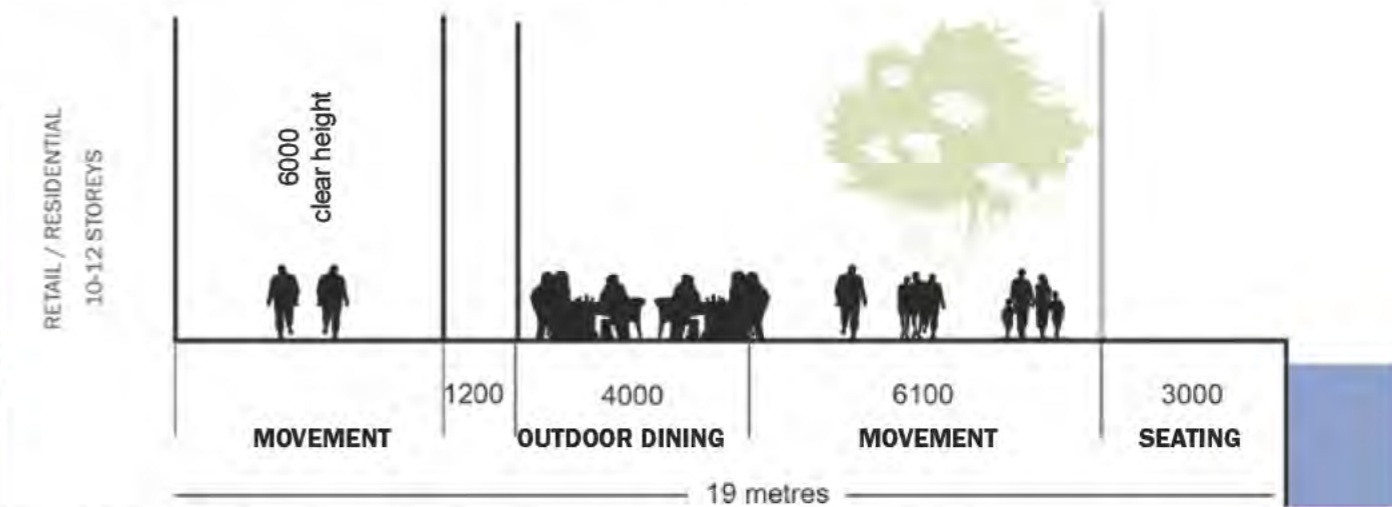


Figure 1.1.14 / Section through Circular Quay East Waterfront noting various zones and uses (Hassell)

WATERFRONT CONTEXT - BENCHMARKS

Harbourside and Cockle Bay Wharf are key examples of current development projects in the immediate context.

Both sites are informed by the Darling Harbour Public Domain Strategy which states in its principles under Section 2.4 "Create a generous and engaging waterfront promenade":

"over time strive to provide a minimum promenade width of 20 metres from the edge of the waterline to the building frontages"

The recently approved Harbourside Redevelopment (SSD-7874) has increased the minimum clear width of the waterfront promenade to 20m with the proponent's submitted Urban Design Review noting that the existing foreshore promenade width and configuration at the north and south of its site creates significant congestion with the existing setbacks being 10.8-11.2m and trafficable widths being 7.5-8.5m at their narrowest. In its statement of reasons, the IPCC noted that a clear width of 20m was deemed an acceptable outcome and improvement on the current condition.

The recently approved Cockle Bay Wharf Redevelopment (SSD-proposal maintains the existing waterfront width of 11.6-17m however has increased the zone available to pedestrianise by relocating the licensed seating areas outside of the promenade area and behind the lease line. The width was deemed an acceptable outcome as a result of significant increase in other open spaces being provided at multiple levels within the future development alongside increased east/west connections.

Harbourside

Average Width	Existing: 10.8 - 28.9m Approved: 14-20m (supplemented by open spaces and through site links)
Access	Public pedestrian access
Typology	Waterfront promenade
Composition	<ul style="list-style-type: none">- A widened promenade along the waterfront- A widened set of stairs adjacent to the Pyrmont bridge- east / west connections that link Darling Harbour to Pyrmont, including a new pedestrian bridge from Bunn Street Pyrmont
Qualities	<ul style="list-style-type: none">- Retail activated with residential, commercial uses and event space
Status	Approved



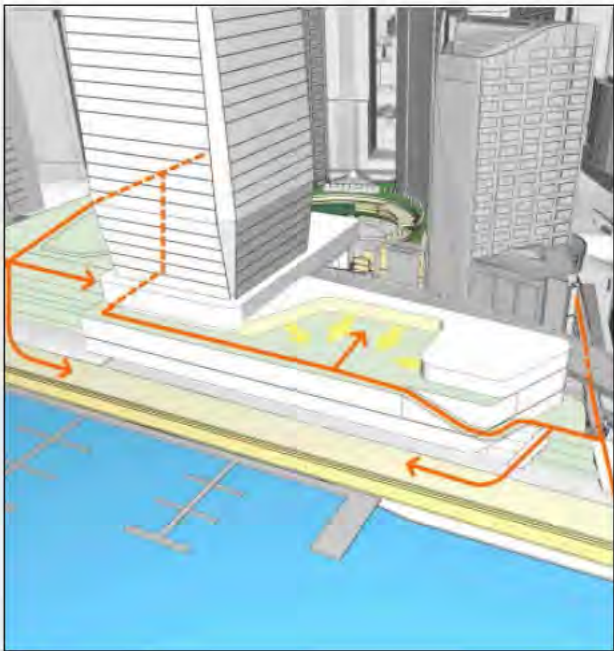
Figure 1.1.15 / Harbourside Waterfront Public Domain Strategy - Stage 2 Design Brief (Mirvac)

Cockle Bay Wharf

Average Width	Existing: 11.6 - 17m Approved: 11.6-17m (supplemented by open spaces and through site links)
Access	Public pedestrian access
Typology	Existing waterfront promenade with changes in width
Composition	<ul style="list-style-type: none">- Highly constrained waterfront promenade- What is compromised in waterfront promenade width is supplemented with upper level open space and a new timber boardwalk
Qualities	<ul style="list-style-type: none">- The built form supports gathering spaces as well as circulation with alignment to Pyrmont Bridge- Proposal relates to existing context- Outdoor seating
Status	Approved



Figure 1.1.16 / Cockle Bay Wharf Waterfront Section and diagram as provided in the submitted design report (GPT)



PYRMONT PENINSULA PLACE STRATEGY (PPPS) APPROACH TO WATERFRONT

PPPS BIG MOVE 1: A WORLD-CLASS HARBOUR FORESHORE WALK

In 2020, the NSW Department of Planning Industry and Environment released the Pyrmont Peninsula Place Strategy (PPPS) alongside the Economic Development Strategy and supporting technical studies.

Within the strategy five 'big moves' were identified which would unlock the potential of Pyrmont and bring the vision to life.

The first big move identified was a world-class harbour foreshore walk with the Blackwattle Bay SSP being one of the final links identified to be delivered.

A continuous connected foreshore is recognised as a critical piece of public infrastructure that will be valuable to residents, visitors and tourists.

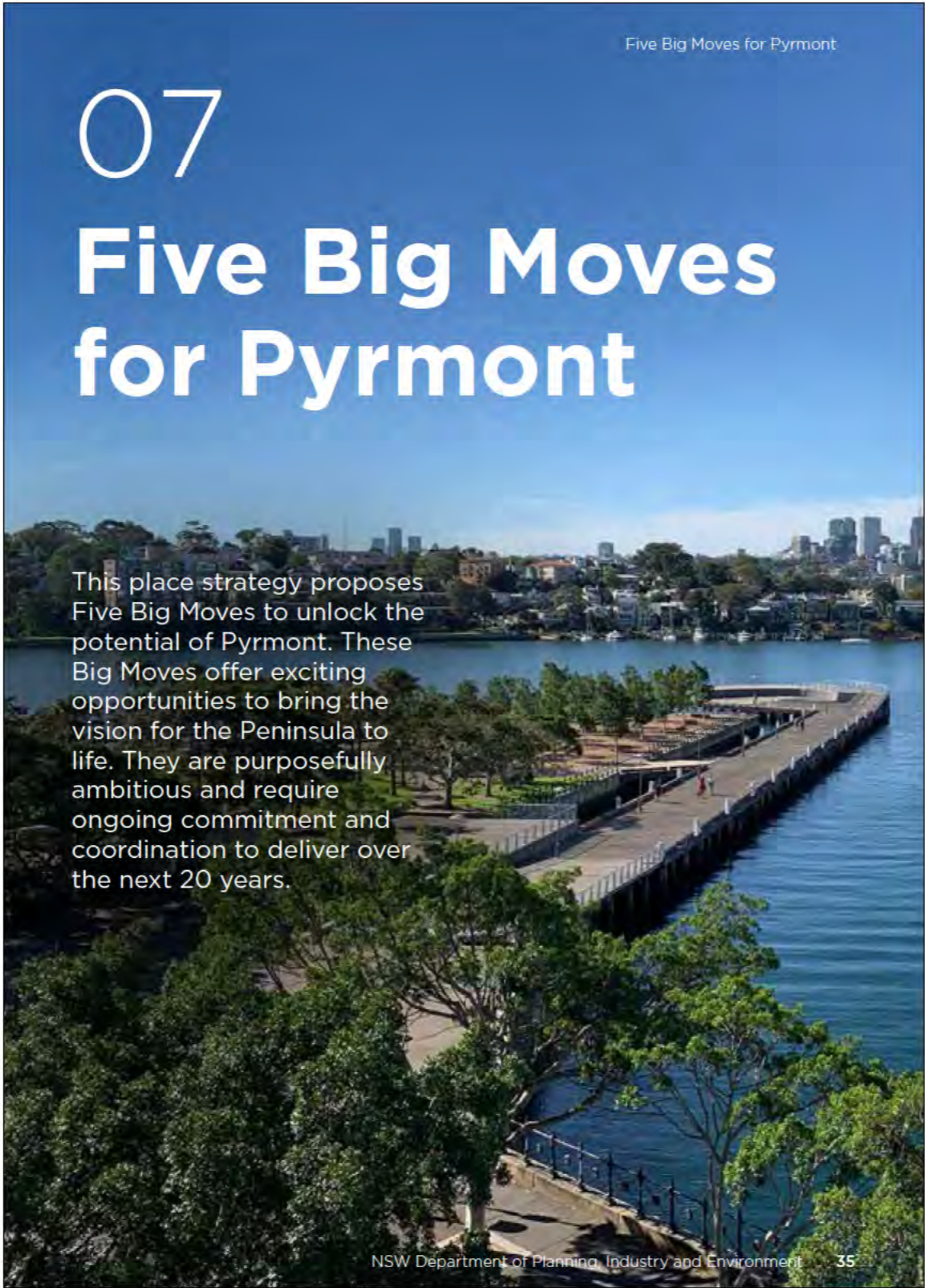


Figure 1.1.17 / Extract of Big Moves Overview and Big Move 1 from the Pyrmont Peninsula Place Strategy (DPIE)

BIG MOVE 1

A world-class harbour foreshore walk

The Pyrmont Peninsula sits on one of the world's most famous harbours. The harbour and foreshore area are an outstanding natural asset and a public asset of national and heritage significance. Completing the final links of the Sydney Harbour foreshore will create a unique and enviable walking and cycling track for tourists, visitors and new recreation opportunities for residents, connected to great public and open space.

The two final links required to complete the foreshore promenade are located between Jones Bay Wharf and Darling Island in the Darling Island sub-precinct and a new promenade as part of the revitalisation of Blackwattle Bay.

A new active transit link is possible via the Glebe Island Bridge to connect Pyrmont with Glebe Island and the future Bays West Precinct. Transport for NSW is currently investigating this potential future link and will consider the importance of an active transit link, the working harbour, other maritime uses and the heritage listing of the bridge and fenders.

Tangible economic and community value will be created by connecting people along the foreshore from Walsh Bay to Darling Harbour and around to the new Sydney Fish Market at the head of Blackwattle Bay. It will provide 9.4 kilometers of uninterrupted foreshore promenade and create a new global destination for Greater Sydney.

This represents a significant placemaking outcome that can only be secured through collaborative partnership between the NSW Government, the City of Sydney, landowners, businesses and community.

The waterfront is also a backdrop showcasing the unique history, heritage and culture of this place, including opportunities to celebrate indigenous culture and storytelling. New opportunities to acknowledge and celebrate indigenous heritage and culture and the maritime and working harbour history of the Peninsula can be explored by new development onsite or across the Peninsula. This includes extending the City's Eora Journey Harbour Walk to include the completed Pyrmont Peninsula harbour foreshore walk, which includes proposals for an Aboriginal name and icon, public artworks, wayfinding and interpretive signage that tell the stories of Sydney's Aboriginal people.

Legend

Existing links

Future link

Final links

Waterways

Two final links

Action 1

Secure the final links of the Sydney Harbour foreshore link at Blackwattle Bay and Darling Island.

Action 2

Acknowledge and celebrate Aboriginal cultural heritage by including the Pyrmont Peninsula harbour foreshore in the City of Sydney's Eora Journey, Harbour Walk project.

Action 3

Acknowledge and celebrate the working harbour history of the Peninsula in new and upgraded sections of the harbour foreshore link.

Action 4

Investigate the repurposing of Glebe Island Bridge to link Pyrmont Peninsula with Bays West.

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Pyrmont Peninsula Place Strategy

PPPS FORESHORE WALK STRATEGY

GENERAL REQUIREMENTS

- A public promenade of minimum 20m measured from high tide line providing public access for walking, cycling, gathering and recreation
- Additional 10m zone to provide for dining and seating areas where associated with retail uses, potentially provided in the form of a colonnaded under-croft with a minimum clear height of 9m.

DINING INTERFACE

- An urban character, primarily edged by retail, commercial and community buildings
- A consistent promenade allowing for movement of pedestrians and cyclists, as well as spaces for outdoor dining, seating, shade, landscape and public art
- Can accommodate smaller events and performances

EVENT INTERFACE

- Generous waterfront spaces that can be used for the safe staging of larger events and gatherings
- Materiality, landscape and urban elements designed to allow for flexibility of use, while providing for everyday convenience and amenity
- Pedestrian access into event spaces to be adequately sized, accessible and providing direct connectivity to surrounding street network and transport nodes

WHARF INTERFACE

- Spaces at the edges of heritage wharves as well as the new Sydney Fish Markets to allow for temporary moorings by water craft.
- Movement space for pedestrians and cyclists to be as wide as possible and not compromised by other uses
- Ground floor activation of buildings to be maximised
- Public amenities, shade and seating to be provided within and at the edges of adjacent buildings

PASSIVE RECREATION INTERFACE

- Generous waterfront spaces that are used primarily for recreation and relaxation, as well as larger events and gatherings
- Movement space for pedestrians and cyclists to be as wide as possible and not compromised by other uses
- Public amenities, shade and seating, trees and landscape to be provided within public spaces
- Opportunity for direct access to and engagement with water

ACTIVE RECREATION INTERFACE

- waterfront spaces that achieve less direct sun access due to orientation used primarily for active recreation and support of on-water activities through landside facilities including marinas and boat storage.
- Movement space for pedestrians and cyclists to be as wide as possible and not compromised by movement between landside uses and potential on-water marinas
- Opportunity for direct access to and engagement with water



Figure 1.1.18 PPPS Indicative foreshore dining interface (Hassell)



Figure 1.1.19 PPPS Indicative foreshore event interface (Hassell)



Figure 1.1.20 PPPS Indicative foreshore wharf interface (Hassell)



Figure 1.1.21 PPPS Indicative passive recreation interface (Hassell)

Harbour Foreshore Walk

Diagram subject to refinement

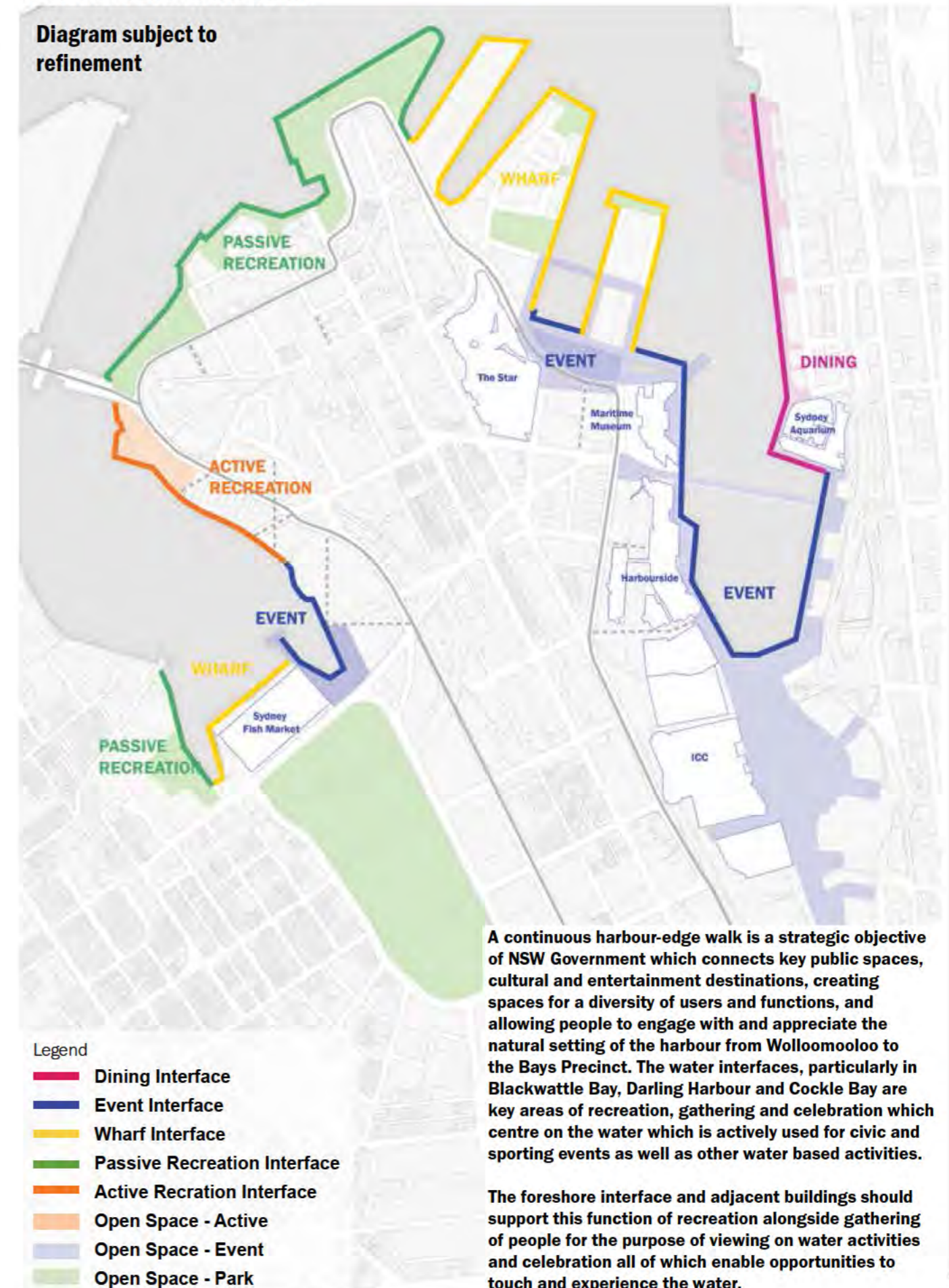


Figure 1.1.22 PPPS Harbour foreshore walk diagram (Hassell)

**BLACKWATTLE BAY STATE SIGNIFICANT
PRECINCT STUDY (BWB SSP)
WATERFRONT STRATEGY**

BWB SSP WATERFRONT STRATEGY

The Blackwattle Bay Urban Design Statement provides the following for the future Waterfront promenade within the SSP extents:

The waterfront promenade has a minimum width of 10m. The width is comprised of three movement zones and a zone for tree planting, seating, lighting and other street furniture.

The 3.5m width directly adjacent the sea wall is a slow movement space for pedestrians to enjoy the outlook across the bay. This zone may include standing, walking with prams, young children and the elderly. Bicycles are not actively encouraged in this zone.

A 1.5m wide planting and street furniture zone provides shade, amenity and places to sit and rest. This space buffers the slow movement zone from the central medium movement zone.

The central 3m wide movement zone accommodates fitness walkers, joggers and low speed recreational cyclists. Cyclists will include tourists and families enjoying a casual ride around the harbour's edge. Faster bike riders are able to choose the proposed separated cycle paths along Bank Street.

A third movement zone is pedestrian focused with potential variation to the pavement surface to discourage use by cyclists. This zone allows pedestrians to stop to consider places to dine in the colonnade of potential Area 2 development.

The colonnade is a 7m required width in the Area 2 building envelopes to allow sheltered outdoor spaces for restaurants, cafes and bars to be accommodated outside of the 10m minimum waterfront promenade width. The colonnade is raised 500mm or 3 steps above the promenade to aid definition of

the dining zone, improve outlook to the bay, and minimise the sea wall height along the promenade taking account of projected sea level rise.

The BWB SSP Urban Design Report provides a series of Character Areas which show the range of proposed future water and building interfaces along the 10m minimum foreshore width.

The drawings and analysis provided within the BWB SSP Urban Design Statement demonstrate that Character Area C is the area where the proposed foreshore experience has the greatest constraints in width and amenity and forms the primary focus of the following review.



Figure 1.1.23 / Extract of BWB SSP Urban Design Statement showing proposed Waterfront Promenade Character Areas (INSW)

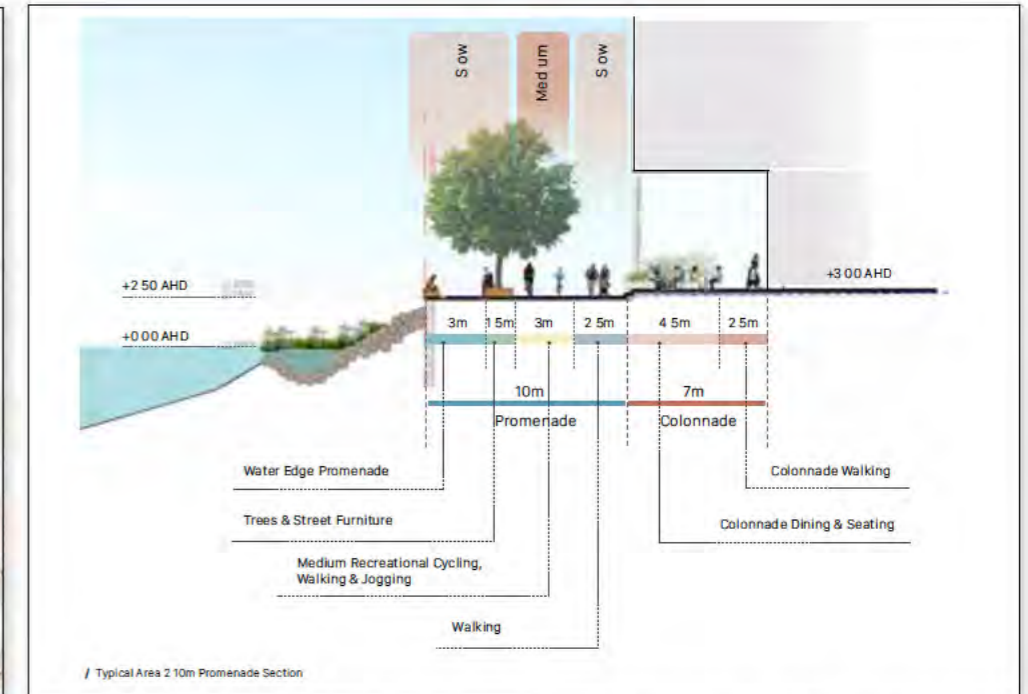


Figure 1.1.24 / Extract of BWB SSP Urban Design Statement showing proposed Waterfront Promenade Section in Character Area C (INSW)

WATERFRONT REVIEW

COMPARISON OF PPPS AND BWB SSP

WATERFRONT REVIEW

Width

The foreshore interface and adjacent buildings should support this function of recreation alongside gathering of people for the purpose of viewing on water activities and celebration, all which enable opportunities to touch and experience the water. A generous waterfront promenade width is essential for the successful delivery of a range of experiences and uses at the harbour edge. It allows for passive recreation and viewing of the water, outdoor dining, boating activity and allows for free-flowing pedestrian and cyclist movement, avoiding points of high congestion. It is important to limit the length of narrow sections and supplement them with open space where possible.

The PPPS Urban Design Report as articulated the following minimum requirements for the future waterfront experience:

- A minimum 20m width at the water edge is required to provide access for walking, cycling, gathering and recreation.
- An additional 10m zone should be provided for dining and seating areas associated with retail uses and could be in the form of a colonnaded under-croft with a minimum 9m height.

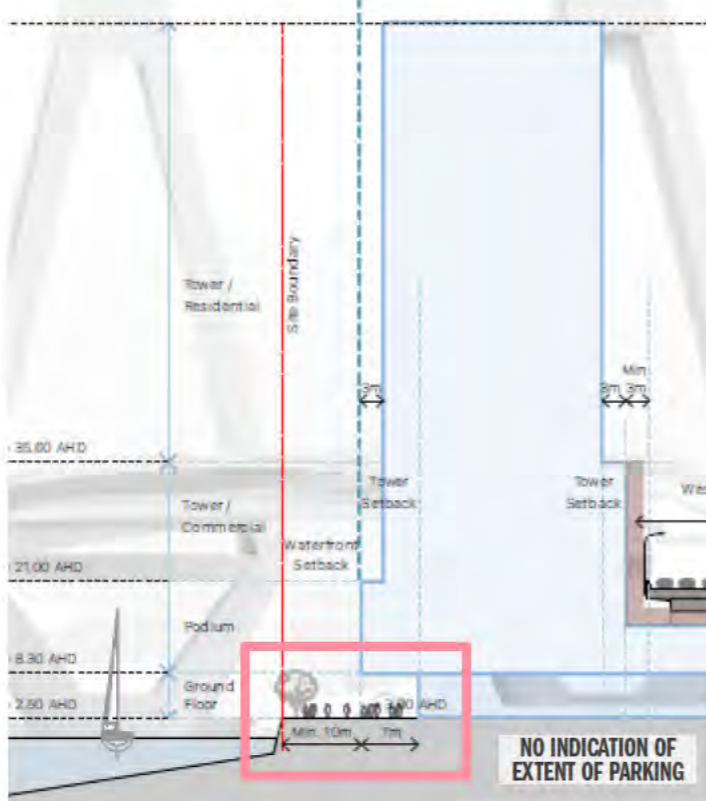


Figure 1.1.25 / Extract of BWB SSP urban design statement noting outcomes in Character Area C (INSW with annotations by HASSELL)

Summary of BWB SSP Proposal:

- The 10m width is zoned for slow and medium pace movement including recreational cycling.
- The promenade expands in width and integrates with open space at Bank Street open space, Miller Street reserve, Waterside Park and the Urban Park.
- Character Area C is the most constrained zone where a 7m wide, grade separated colonnade for retail uses is proposed as a potential outcome
- Options have been tested and reviewed with key stakeholders. The options include a continuous 30m wide waterfront promenade as suggested by the Study Requirements, a 20m waterfront promenade and a variable width promenade with a minimum width of 10m.
- The study found a 30m wide waterfront promenade would provide a consistent linear movement and recreation space along the eastern edge of Blackwattle Bay.
- The study found a 30m wide promenade would reduce the developable depth of Private Land Owner sites to as little as 14m with the easements around the Western Distributor taken into consideration. A wide land dedication and minimal available building footprint renders renewal of the sites unfeasible.
- The study found a 20m wide waterfront promenade increases the minimum width of the Area 2 sites to 24m. It concluded effective floor plates could only be achieved on these sites with zero lot or minimal side setbacks, effectively creating a wall of built form with little opportunity for sun access through to the public domain.

PPPS Objective

Deliver a connected waterfront.

A foreshore setback of 20m must be provided as public open space exclusive of dining areas

A further 30m of foreshore building limited to RL35 in height with taller buildings permitted in this zone only where clear public benefit and waterfront amenity is demonstrated.

Focusing on high amenity places and taking advantage of harbour views by setting back from the Foreshore Walk to allow for access to sun light within open space and providing community and cultural facilities.

BWB Alignment

✓

✗

✗

✗

Comment

→ The proposed foreshore promenade is in line with the PPPS and government objectives as being part of the global waterfront from The Bays to Woolloomooloo.

→ The proposed foreshore setback and promenade of 10m is inadequate when compared to NSW Government Objectives as articulated in the PPPS, and references provided within the submitted reporting.

→ The INSW report cites the setback width as making developable lots unviable at 14m (30m waterfront promenade) and 24m (20m waterfront promenade). However, it is possible to design a single-loaded corridor residential buildings in these dimensions.

→ Airspace above western distributor motorway as an alternative to encroaching into waterfront promenade.

→ The proposed built form is a consistent wall at RL90 with inadequate building separation for the proposed land use.

→ The public benefits and waterfront amenity likely to be delivered as a result of the reduced foreshore setback, are unlikely to justify exceeding RL35.

→ The level of amenity proposed within Character Area C in particular is inadequate compared to benchmarks provided.

- ✓ Proposal is aligned with PPPS objectives
- Proposal could be aligned with PPPS subject to minor refinement
- ✗ Proposal is not aligned with PPPS objectives

WATERFRONT REVIEW

Height and setbacks

The bay interfaces are key areas within the Pyrmont Peninsula for recreation, gathering and celebration. They centre on the water which is used for civic and sporting events as well as other water-based activities. The waterfront should support gathering, viewing on-water activities and celebration, as well as providing opportunities to touch and experience the water. Improving the generosity and experience of the foreshore is critical and subject to:

- appropriate width
- high-quality design and programming
- good solar and wind amenity

The PPPS defines the following to ensure NSW Government's strategic objectives for the water front can be met:

- a foreshore setback of 20m must be provided as public open space exclusive of dining areas
- an additional 10m zone should be provided where the orientation and adjacent use is appropriate for dining areas associated with retail tenancies potentially within a colonnaded under-croft (min 9m clear height)
- a further 30m of foreshore building limited to RL35 in height with taller buildings permitted in this zone only where clear public benefit and waterfront amenity is demonstrated.

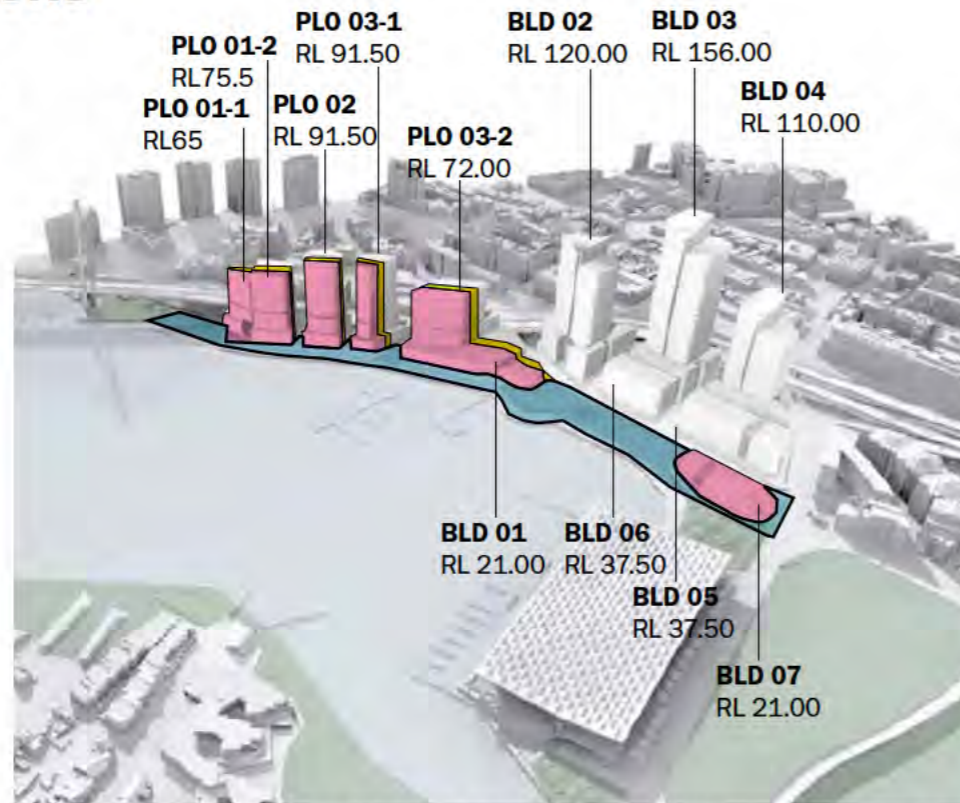


Figure 1.1.26 / 3d View of BWB SSP proposal noting bay interface area and areas of proposed building which do not align with the PPPS objectives (INSW with annotations by HASSELL)



Figure 1.1.27 / Plan of BWB SSP proposal noting bay interface area and areas of proposed building which do not align with the PPPS objectives (HASSELL)

Summary of BWB SSP Proposal:

- A foreshore setback of 10m is proposed to building podiums for properties north of Miller Street is 10m (Buildings PLO 01, PLO 02, PLO 03, BLD 01).
- A foreshore setback of 17m is indicated in illustrative sections to the ground floor on properties north of Miller Street however this is not a stated requirement of built form in the submitted documentation (Buildings PLO 01, PLO 02, PLO 03, BLD 01).
- A foreshore setback of 13m is indicated to tower forms on properties north of Miller Street however this is not a stated requirement of built form in the submitted documentation (Buildings PLO 01, PLO 02, PLO 03, BLD 01).
- A community building is proposed at the Wattle Street intersection which is entirely within the foreshore area and relies on land reclamation associated with the new Sydney Fish Market to enable a foreshore promenade. The exact setback to this building is unclear in the submitted documentation (BLD 07).
- 15m separation is proposed between towers above the podium creating a consistent wall of development on the waters edge for properties north of Miller Street (Buildings PLO 01, PLO 02, PLO 03).

PPPS Objective	BWB Alignment	Comment
A foreshore setback of 20m must be provided as public open space exclusive of dining areas	✗	→ The 10m setback to the foreshore is not considered an appropriate contextual response to the bay interface and is inconsistent with Sydney benchmarking.
Building setbacks demonstrate a sympathetic approach to local heritage and character by reflecting the urban grain of the Peninsula	✗	→ The proposed foreshore setback and promenade is not consistent with the generosity of open space required for a range of activities in this location
Transition heights between the Harbour interface zone and areas capped by maintaining amenity to open space	✗	→ Amenity impacts and enjoyment of the waterfront space are compromised by setbacks and overshadowing → Alternative built form options required for further testing
An additional 10m zone should be provided where the orientation and adjacent use is appropriate for dining areas associated with retail tenancies potentially within a colonnaded under-croft (min 9m clear height)	■	→ An additional setback of 7m is indicated in illustrative sections to the ground floor on properties north of Miller Street however this is not a stated requirement of built form in the submitted documentation (Buildings PLO 01, PLO 02, PLO 03, BLD 01). → The indicated clear height of 5.8m is inadequate but could be increased (Buildings PLO 01, PLO 02, PLO 03, BLD 01). → Whilst the specific metrics are not met, alignment may be possible subject to design development.
A further 30m of foreshore building limited to RL35 in height with taller buildings permitted in this zone only where clear public benefit and waterfront amenity is demonstrated.	✗	→ The proposed extent of towers above the podium creates a wall of development which is inconsistent with historical waterfront approvals within central Sydney of comparable foreshore setbacks. → The public benefits and waterfront amenity likely to be delivered as a result of the reduced foreshore setback, are unlikely to justify exceeding RL35.

WATERFRONT REVIEW

Solar Access

Solar access to the waterfront is essential for enabling and supporting a variety of uses, and to meet the ambition of the PPPS to create a world-class harbour foreshore walk.

The orientation of the waterfront promenade in Area 2, particularly at the pinch point of private land holdings, provides very poor solar access, with complete overshadowing on the winter solstice.

This area will be suitable for night time activation, boating and berthing, and other activities that are less reliant on solar access.

There is an opportunity in Character Area C to program specific activities that are appropriate for a location with limited solar access. The public offering must work with the specific site constraints to ensure the success of this portion of Blackwattle Bay.

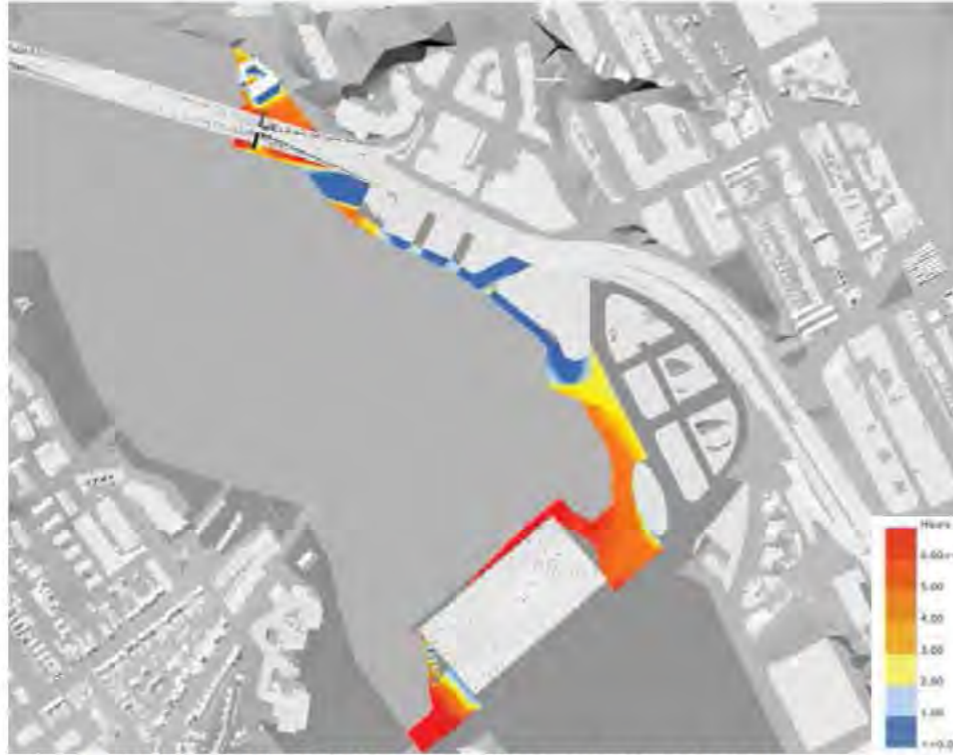


Figure 1.1.28 / Extract of BWB SSP Urban Design Statement analysing hours of direct sunlight to the foreshore and adjacent open space on the winter solstice (INSW)

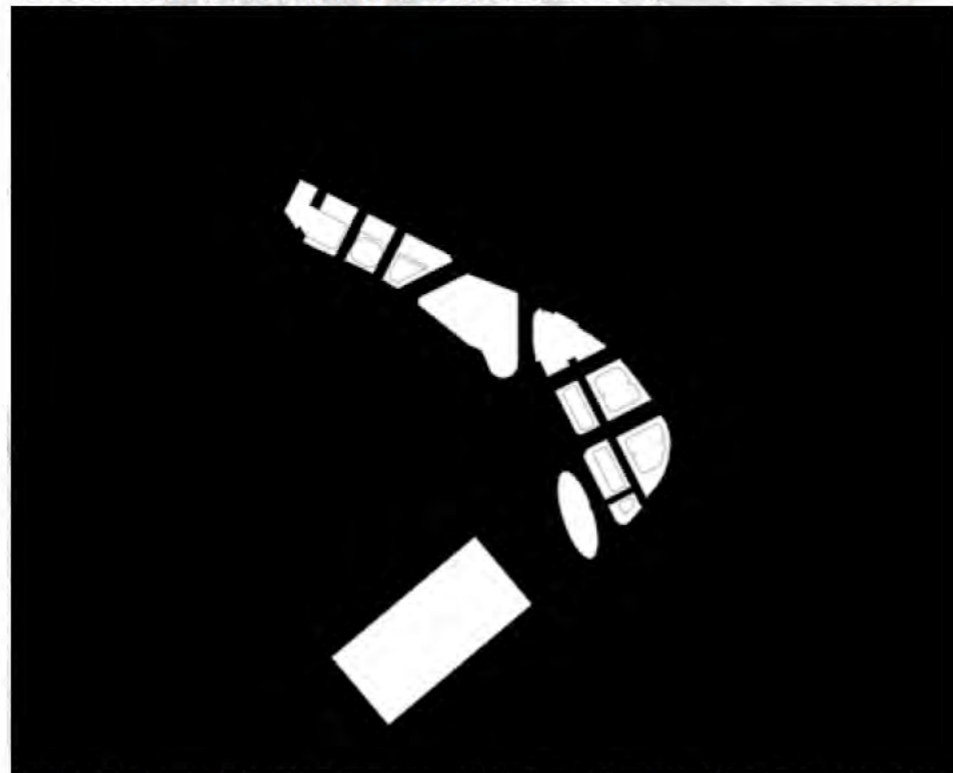


Figure 1.1.29 / Extract of BWB SSP Urban Design Statement showing plan of overhead shadows on the winter solstice as cast by proposed built form at 9am, 12pm and 3pm (INSW)

Summary of BWB SSP Proposal:

- DCP 2012 controls and SSP study requirements have lead to a full range of sun and overshadowing analysis for the site and surrounding residential, educational and recreational uses. Building envelopes and orientation have evolved to achieve minimum solar access on the 21st of June (winter solstice). Additional design controls have been set to minimise overshadowing and establish a best outcome street network and grid driven by solar access. A key principle for the renewal of Blackwattle Bay is minimising any overshadowing of the existing public domain and open space.
- The open space solar zones can be broken into 4 areas:
 1. The promenade, a minimum 10m wide continuous open space that connects the Study Area from the Glebe Foreshore and New Sydney Fish Market to the Pyrmont peninsula.
 2. Bank Street open space, the northern most open space situated under the Anzac Bridge.
 3. The Miller Street Reserve which includes a portion of the promenade in front of the Private Land Owner sites.
 4. The Waterside Park and Urban Park which are the principal open spaces that join the government site with the new Sydney Fish Market.

PPPS Objective	BWB Alignment	Comment
Ensure that increases to existing building height do not compromise the amenity of public open spaces identified as areas to be protected from additional overshadowing.	✓	Proposal is aligned with PPPS objectives
	-	Proposal could be aligned with PPPS subject to minor refinement
	✗	Proposal is not aligned with PPPS objectives
	✗	
Ensure that new development does not overshadow existing public space as indicated by the plan consistent with City of Sydney solar access plane controls.	✗	→ The aspect and orientation of Area 2 is highly constrained in relation to solar access, however, the waterfront promenade should receive sunlight between 9am-3pm on the winter solstice. The park and the waterfront are considerably overshadowed in mid-winter as a result of site orientation and proposed built form extents and configuration. → The current proposal for height, bulk and scale at the waterfront is creating a further compromise for solar access to the waterfront promenade.
Quality of the open space is supported by access to nature and sunlight, a sense of enclosure, diverse activities and enhanced connectivity.	✗	→ The proposed solar amenity to the waterfront is inadequate relative to NSW government's strategic objectives for the waterfront experience. → The proposed foreshore promenade width is not consistent with the generosity of open space required for a range of activities in this location.

WATERFRONT REVIEW

Activation and Programming

The waterfront promenade is designed for a range of uses, however, the solar access constraint will determine the usability of the spaces for a variety of year-round activities. The waterfront promenade must be prioritised and opportunities for activation should avoid conflict with active and passive promenade use.

Character Area C will always be challenging in relation to solar amenity. Therefore, the programming, waterfront width and building heights will be key to creating a successful space that is suitable for its use.

The fact that the waterfront is compromised in relation to solar access in this location is not a reason to reduce or compress the waterfront promenade. In fact, it is of paramount importance to maintain a high quality link in the greater foreshore walk from The Bays to Woolloomooloo. The future use will be a loop for active recreation that can be likened to two of Sydney's best loved walking loops:

- The Bay Run (City of Canada Bay)
- Narrabeen Lagoon (Northern Beaches Council)

It is an extremely valuable asset for Sydney and must be maintained for the future.

The corporate charter area could be relocated to the future expansion zone (marked as 16) which would create a clear water zone at Waterside Park. The water zone marked as 16 has compromised solar access which would be suitable for boating uses. The ground floor use of buildings 8, 9 or 10 may support a yacht club with night time activity.



Figure 1.1.30 / Detail of BWB SSP rendered master plan noting recommended relocation of uses to mitigate impacts of limited direct solar access to Character Area C (INSW)



Figure 1.1.31 / Detail of PPPS Waterfront Strategy noting recommended active recreation uses to mitigate impacts of limited direct solar access to Character Area C (Hassell)

Summary of BWB SSP Proposal:

- The waterfront promenade has a minimum width of 10m. The width is comprised of three movement zones and a zone for tree planting, seating, lighting and other street furniture.
- The 3.5m width directly adjacent the sea wall is a slow movement space for pedestrians to enjoy the outlook across the bay. This zone may include standing, walking with prams, young children and the elderly. Bicycles are not actively encouraged in this zone.
- A 1.5m wide planting and street furniture zone provides shade, amenity and places to sit and rest. This space buffers the slow movement zone from the central medium movement zone.
- The central 3m wide movement zone accommodates fitness walkers, joggers and low speed recreational cyclists.

PPPS Objective	BWB Alignment	Comment
Address potential impacts of 24-hour economy activities on amenity including noise, safety, traffic and transport, amongst others.	✓	<ul style="list-style-type: none"> → Supporting the social Infrastructure needs of the Events and Commercial Precinct anchored by ICC Sydney, Harbourside, the Maritime Museum, The Star and Sydney Fish Markets
Focusing on high amenity places and taking advantage of harbour views by setting back from the Foreshore Walk to allow for access to sun light within open space and providing community and cultural facilities	-	<ul style="list-style-type: none"> → Connecting these destinations and providing spaces recreational spaces for local and international visitors, employees and residents including event and gathering spaces, smaller spaces for relation, exercise, retail and dining
Formalise public boating facilities, including launch points and storage for kayaks, canoes and dragon boats to enhance public access and use of the water for recreational activities.	✗	<ul style="list-style-type: none"> → The proposed foreshore setback and promenade is not consistent with the generosity of open space required for a range of activities in this location
A consistent promenade width of 20 metres, allowing for movement of pedestrians and cyclists, as well as spaces for outdoor seating, shade, landscape and public art.	✓	<ul style="list-style-type: none"> → Provisions for retaining, relocating or expanding public boating facilities within the precinct. → Consider relocation of corporate charter to future position to free up the water interface at Waterside Park and pair ground floor building uses with boating facilities in this location
	✗	<ul style="list-style-type: none"> → The 10m width zoned for slow and medium pace movement including recreational cycling is not adequate for the waterfront promenade and does not offer allowance for congestion reduction and for cyclists and pedestrians to comfortably share the waterfront

1.2

HEIGHT REVIEW

PYRMONT PENINSULA PLACE STRATEGY (PPPS) HEIGHT STRATEGY OVERVIEW

BENCHMARKS FOR BLACKWATTLE BAY

PPPS Peninsula References

1. Cockle Bay (Sofitel Sydney Darling Harbour RL132)
2. Star Casino (RL110 proposed under PPPS)
3. Ultimo (UTS Tower RL120)

PPPS Immediate References

4. Anzac Bridge Pylon (RL120)
5. Distillery Hill (RL90)
6. Western Distributor Road Level (RL 21)
7. Developments Adjacent to the Western Distributor (RL35)
8. Wattle Street Heritage Warehouses (27-33m)
9. 2 Bowman St (RL 52)



Figure 1.2.1 / Aerial view of Pyrmont Peninsula noting contextual height references relevant to the Blackwattle Bay State Significant Precinct Master Plan (DPIE with annotations by Hassell)

PPPS HEIGHT STRATEGY

The Pyrmont Peninsula Place Strategy (PPPS) has been developed to enable future growth and renewal whilst protecting and enhancing the unique character and amenity of the Peninsula, including responding to the topography, heritage fabric and harbour and urban setting and character.

The PPPS has identified the following opportunities and considerations for maximising public benefit and amenity for future development:

- Built form should respond to and respect the relationship to topography and heritage
- Built form should reduce wind impacts for public spaces and private communal areas
- Built form should minimise view impacts
- Built form overshadowing should comply with solar access requirements for open space and residential dwellings
- Future built form should improve the streetscape experience through increased tree canopy cover, active frontages, increased footpaths and street furniture and amenity
- Future built form should integrate with surrounding context through alignment with street wall heights and upper level setbacks.
- Future development should align proposed land use with the objectives of the Economic Development Strategy (EDS)
- Future development should seek to achieve design excellence including application of sustainable design solutions, enhancement and expansion of the public domain
- Future development should seek to achieve public benefit including application of sustainable design solutions, enhancement and expansion of the public domain.

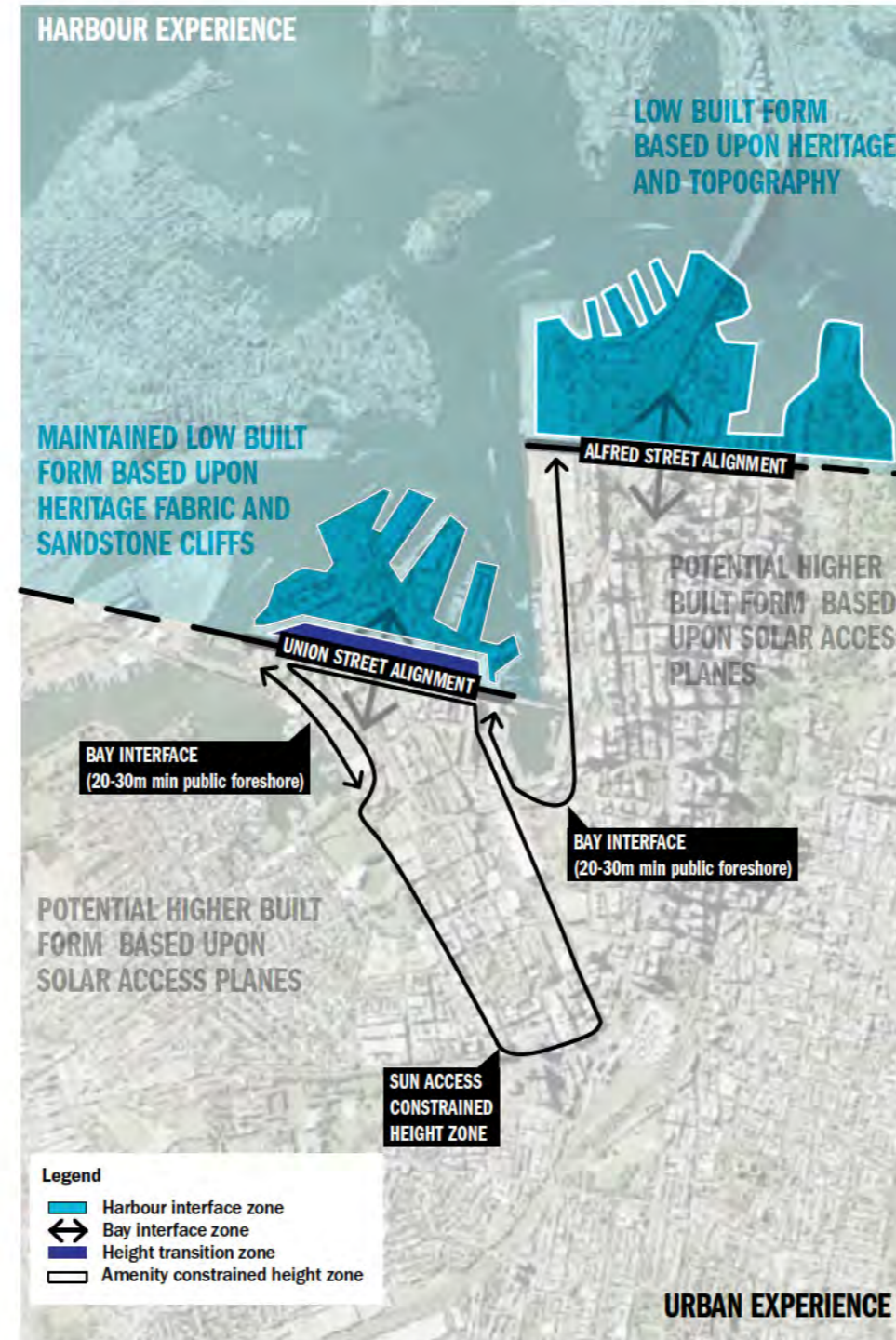


Figure 1.2.2 / Plan of Pyrmont Peninsula showing relationship of proposed PPPS height zones to existing Sydney CBD heights (Hassell)

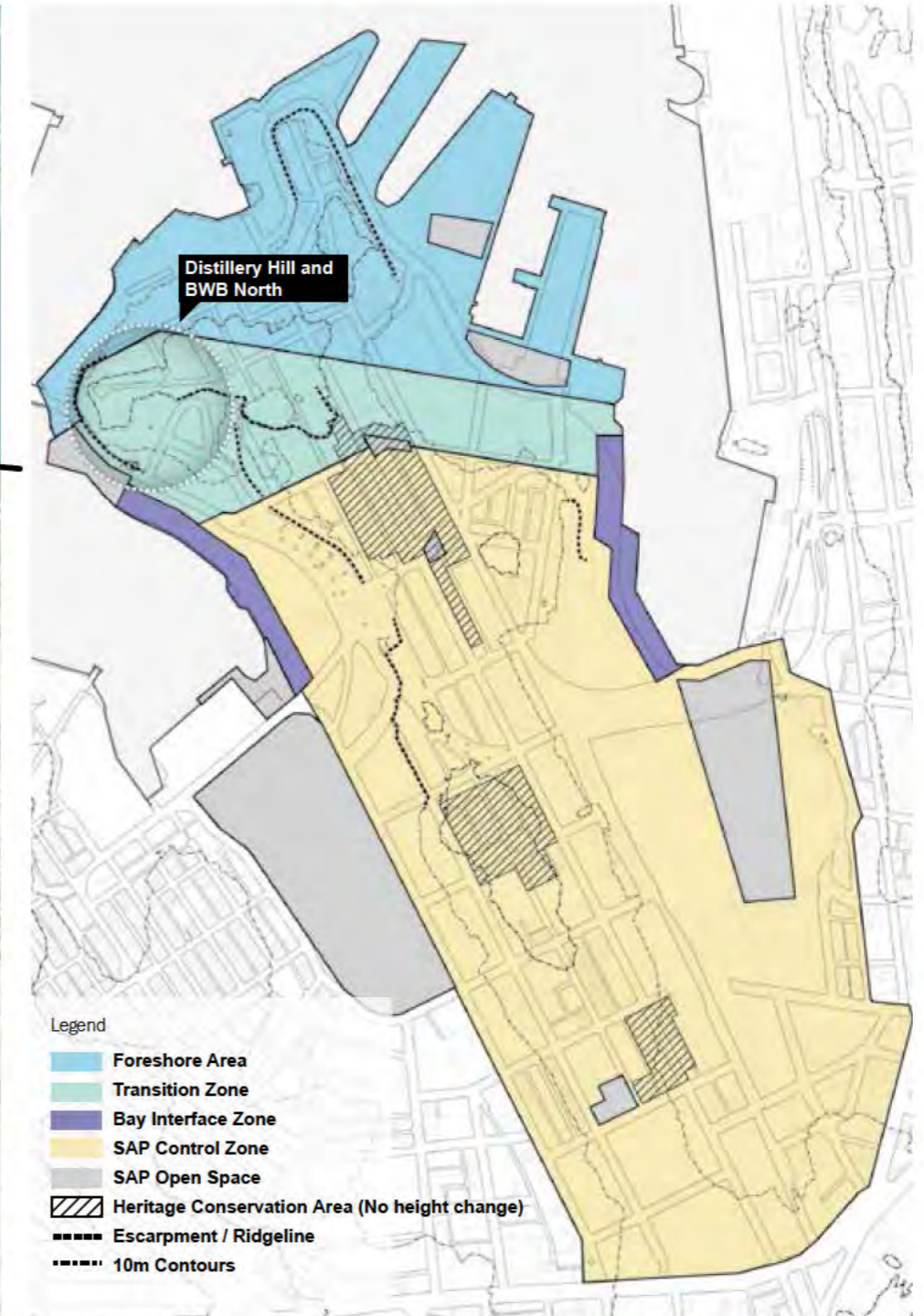


Figure 1.2.3 / Plan of Pyrmont Peninsula showing height areas under the PPPS height strategy (Hassell)

PPPS HEIGHT STRATEGY

Blackwattle Bay - Solar Protection (SAP)

In addition to the Bay Interface Zone, the amenity of streets and public open spaces are protected by sun access planes. Sun access planes are able to maintain sunlight to important places and allow spaces to not be negatively impacted upon by overshadowing by the adjacent built form through maximised amenity and enjoyment of the space for the community. There are two types of controls used within central Sydney for sun access, these being:

- 1. Sun Access Planes (SAP)
- 2. Overshadowing of Certain Public Places (No Additional Overshadowing - NAO)

The spaces of Bank Street Park, Sydney Fish Markets Square and Wentworth Park will be protected with sun access planes - both inclusive of winter solstice and equinox considerations.

Solar Protection 10am-2pm:

SUN ACCESS CONSIDERATION	Open Space #	Name	Approximate Average RL at ground
SAP	1	Banks Street Park	RL4.27
SAP	3	Wentworth Park	RL3.73

Solar Protection 12-2pm:

SUN ACCESS CONSIDERATION	Open Space #	Name	Approximate Average RL at ground
SAP	2	Sydney Fish Markets Square	RL1.73



Figure 1.2.4 / Plan of Pyrmont Peninsula showing key open spaces with amenity controls articulated under the PPPS affecting BWB SSP (Hassell)

PPPS HEIGHT STRATEGY

Blackwattle Bay - Bay Interface

The development of the BWB SSP site will contribute to the realisation of the Bay Interface Zones as identified in the PPPS Height Strategy. The Bay Interface Zone represents the former docks of Sydney. These docks will be renewed through a series of State Government approved developments which provide for a foreshore walk and a low rise building zone. The Bay Interface Zone assumes the following:

- A foreshore setback of 20m must be provided as public open space exclusive of dining areas
- An additional 10m zone should be provided where the orientation and adjacent use is appropriate for dining areas associated with retail tenancies potentially within a colonnaded under-croft (min 9m clear height)
- A further 30m of foreshore building limited to RL35 in height with taller buildings permitted in this zone only where clear public benefit and waterfront amenity is demonstrated.

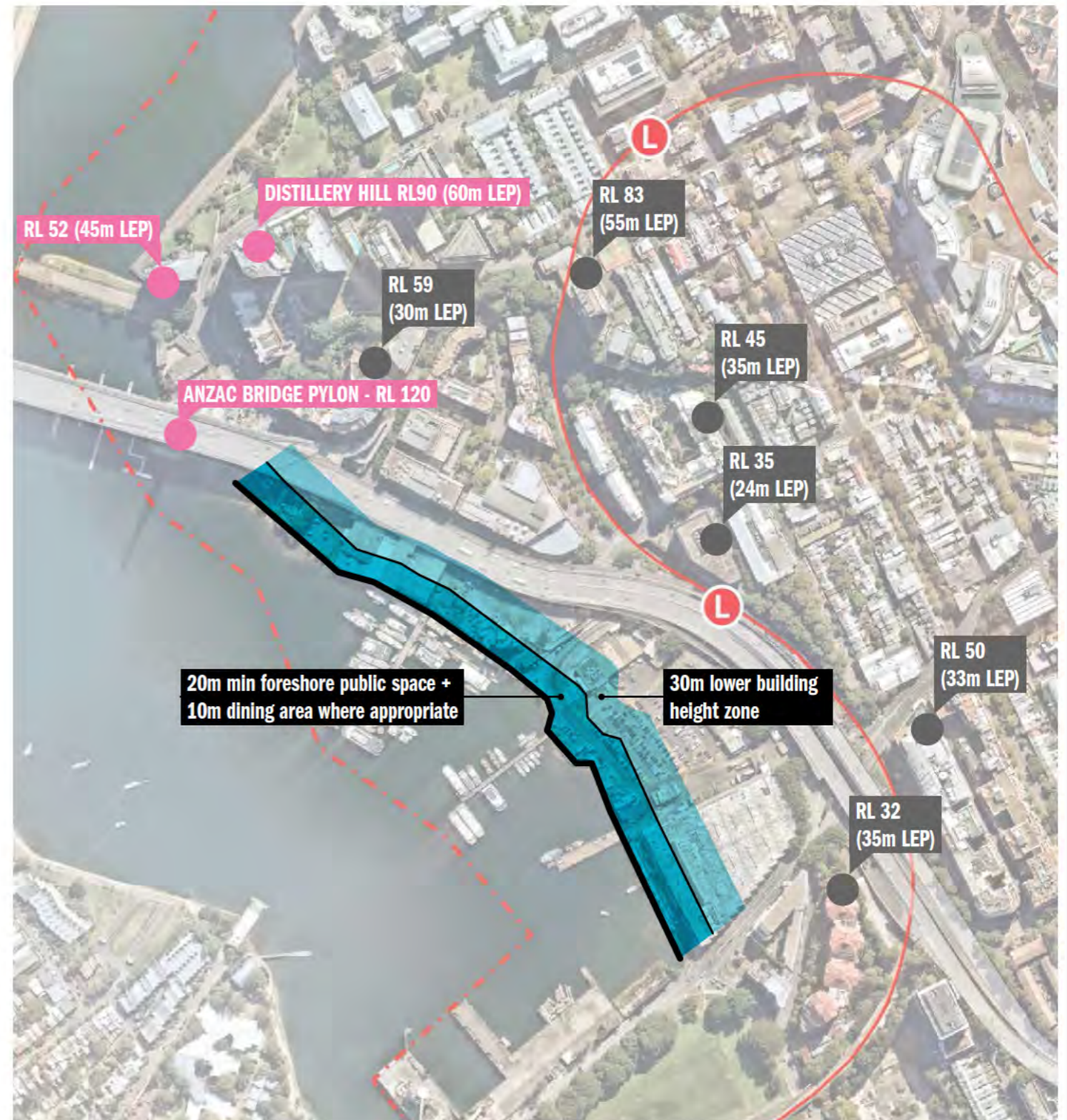


Figure 1.2.5 / Plan of Blackwattle Bay SSP showing extent of Bay interface zones articulated in the PPPS (Hassell)

BLACKWATTLE BAY - SOLAR PROTECTION (SAP)

Wentworth Park

Proposed SAP Control

Type	Sun Access Plane
Intended Period of Protection	10am - 2pm, all year
Primary Plane Date	21 June
Primary Plane Time	10, 12, 14.00

Legal description	Area
677/-/DP729635	57,216.22 m ²
8/-/DP1033151	5,688.70 m ²
678/-/DP729635	39,446.93 m ²
679/-/DP729635	29,574.07 m ²

Notes: Existing open space, light rail viaduct and greyhound race track

Description
TEXT IN PROGRESS

NOTE: SAP DEFINITION IS A GUIDE FOR MASTER PLANNING PURPOSES ONLY AND SUBJECT TO VERIFICATION, CONSULTATION AND MAY CHANGE

Legend

A1 Ray ascending edge

300m Contour

50m Contours

10m Contours

(ii) Plane numbers

Figure 1.2.6 / Potential Wentworth Park SAP developed to inform masterplan investigations under the PPPS (Hassell)

Bank Street Park

Proposed SAP Control

Type	Sun Access Plane
Intended Period of Protection	10am - 2pm, all year
Primary Plane Date	21 June
Primary Plane Time	10, 12, 14.00

Legal description	Area
19/-/DP803159	1597 m ²
20/-/DP803159	5623 m ²
5/6/-/DP803160	1869 m ²

Notes: Existing Jetty, boat storage and undeveloped open space under and around the Western Distributor and Pyrmont Bridge pylon

Description
TEXT IN PROGRESS

NOTE: SAP DEFINITION IS A GUIDE FOR MASTER PLANNING PURPOSES ONLY AND SUBJECT TO VERIFICATION, CONSULTATION AND MAY CHANGE

Legend

A1 Ray ascending edge

300m Contour

50m Contours

10m Contours

(ii) Plane numbers

Figure 1.2.7 / Potential Bank Street Park SAP developed to inform masterplan investigations under the PPPS (Hassell)



Boundary ref:	MGA 56 Coordinates		Estimated natural ground level	Associated HOB control
	Easting	Northing		
A	332329.05	6250806.44	RL 0.66	27m
B	332332.47	6250818.05	RL 0.71	27m
C	332334.45	6250846.65	RL 0.51	27m
D	332399.15	6250890.33	RL 5.59	27m
E	332422.35	6250858.07	RL 6.46	27m
F	332462.33	6250817.48	RL 4	45m
G	332501.75	6250797.49	RL 4.49	45m
H	332462.88	6250721.65	RL 0.65	22m

Based upon DPIE cadaster and City of Sydney 1m contour model. All to be confirmed by survey.

Solar Protection Rays			
Date	Time	Sun Location	
		Azimuth	Altitude
Summer Solstice - 22 Dec	10am	74.55°	63.21°
Equinox - 23 Sept	10am	46.60°	45.48°
Winter Equinox - 21 June	10am	29.98°	26.34°
Winter Equinox - 21 June	12pm	359.16°	32.72°
Winter Equinox - 21 June	2pm	328.63°	25.69°
Equinox - 23 Sept	2pm	310.49°	44.16°
Summer Solstice - 22 Dec	2pm	282.25°	60.44°

Sydney Fish Markets Square

Proposed SAP Control

Type	Sun Access Plane
Intended Period of Protection	12pm - 2pm, all year
Primary Plane Date	21 June
Primary Plane Time	14.00

Legal description	Area
4/-/DP1064339	6520.13 m ²

Notes: Existing waterfront

Description
TEXT IN PROGRESS

NOTE: SAP DEFINITION IS A GUIDE FOR MASTER PLANNING PURPOSES ONLY AND SUBJECT TO VERIFICATION, CONSULTATION AND MAY CHANGE

Legend

A1 Ray ascending edge

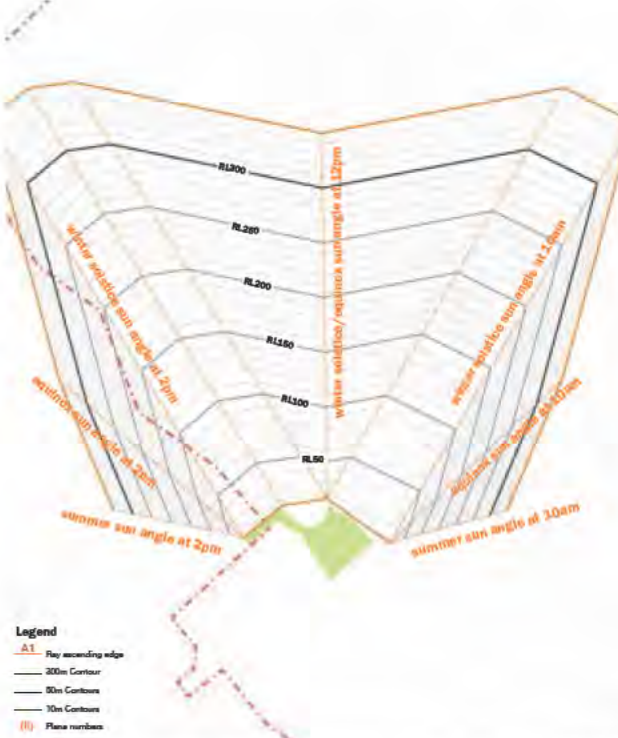
300m Contour

50m Contours

10m Contours

(ii) Plane numbers

Figure 1.2.8 / Potential Fish Markets Square SAP developed to inform masterplan investigations under the PPPS (Hassell)



Boundary ref:	MGA 56 Coordinates		Estimated natural ground level	Associated HOB control
	Easting	Northing		
A	332629.49	6250363.57	RL 0.99	15
B	332684.08	6250409.42	RL 0.97	15
C	332748.04	6250419.48	RL 1.34	15
D	332837.13	6250356.5	RL 1.77	6

Based upon DPIE cadaster and City of Sydney 1m contour model. All to be confirmed by survey.

Solar Protection Rays			
Date	Time	Sun Location	
		Azimuth	Altitude
Summer Solstice - 22 Dec	10am	74.55°	63.21°
Equinox - 23 Sept	10am	46.60°	45.48°
Winter Equinox - 21 June	10am	29.98°	26.34°
Winter Equinox - 21 June	12pm	359.16°	32.72°
Winter Equinox - 21 June	2pm	328.63°	25.69°
Equinox - 23 Sept	2pm	310.49°	44.16°
Summer Solstice - 22 Dec	2pm	282.25°	60.44°

**BLACKWATTLE BAY STATE SIGNIFICANT
PRECINCT STUDY (BWB SSP)
HEIGHT STRATEGY OVERVIEW**

BWB HEIGHT STRATEGY

As part of the BWB SSP a draft precinct plan was created that outlined potential building heights for the Blackwattle Bay Sub-Precinct.

The BWB SSP planning envelopes have guided the master plan proposal to define a potential built form approach including site structure and through site links, building separation and podium and tower heights.

It is important to note that there are no master plan drawings provided that clearly locate the building envelopes. As such verification of the proposed outcomes is heavily reliant on interpretation of provided illustrations and accompanying text.

The potential street wall heights are aligned to two scales. The lower 2-4 storey scale is aligned to the Harris Street spine, whereas the 8 storey scale is aligned to the existing warehouse development along Wattle Street. In addition to street wall heights, the potential mid-scale tower developments are aligned to the existing towers of Distillery Hill. In comparison, taller tower heights are noted in relation to the building heights of The Sofitel hotel, the future towers at Harbourside, The Star, future Pyrmont Metro station and indicative future developments adjacent to the Blackwattle Bay sub-precinct.

Based on these factors, the building height approach is on the following benchmarks:

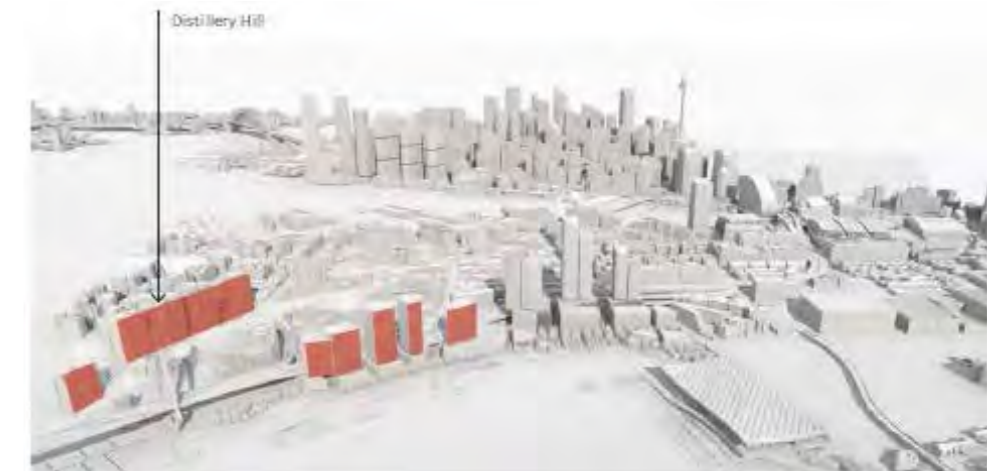
- 21m: Desired human-scale height immediately adjacent to harbour's edge, as well as framing primary streets and future open spaces. Referred to as Podium Scale it is approx. 6 storeys.
- 55m: Height of existing buildings just back from harbour's edge such as Evolve in Jackson Landing. Referred to as Waterfront Scale it is approx. 18 storeys.

- 90m: Height of existing buildings on the ridgeline of Jacksons Landing such as the Sugar Dock building. Referred to as Top of Distillery Hill it is approx. 30 storeys.
- 120m: Height of the Anzac Bridge pylons and the height of buildings at UTS and Central Park. It is approx. 40 storeys.
- 156m: Obstacle Limitation Survey (OLS) height for aircraft movement. Height above the OLS are subject to federal authority approval. Referred to as the OLS it is approx. 45 storeys.

Benchmark Approach:



Street Wall



Mid Scale



Setback Tower Form

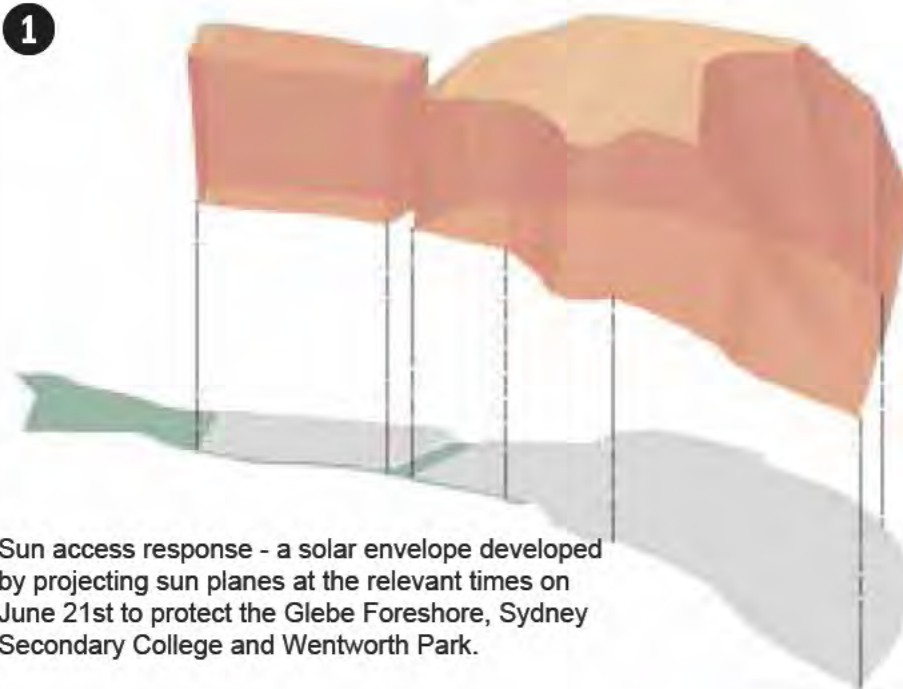
Figure 1.2.9 / Height Strategy Diagrams provided by INSW under the BWB SSP Urban Design Statement (FJMT)

BWB HEIGHT STRATEGY

The BWB SSP building height strategy has been developed through a 6-part process of generated planning envelopes

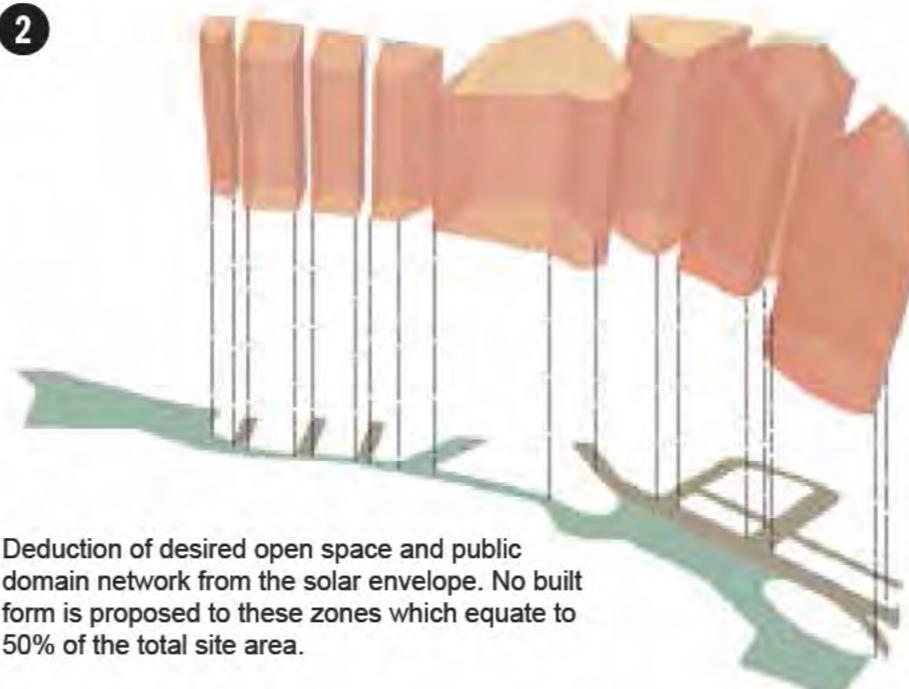
that identify the considerations of sun access, overshadowing, open spaces / public domain network, built form scale and response to surrounding built forms. The 6-part process was outlined as:

1



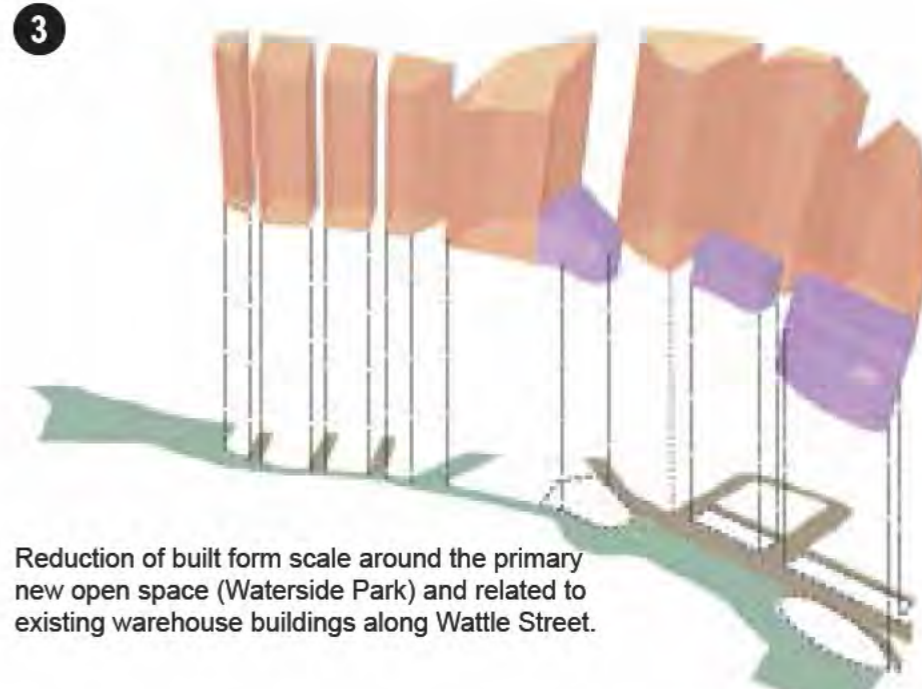
Sun access response - a solar envelope developed by projecting sun planes at the relevant times on June 21st to protect the Glebe Foreshore, Sydney Secondary College and Wentworth Park.

2



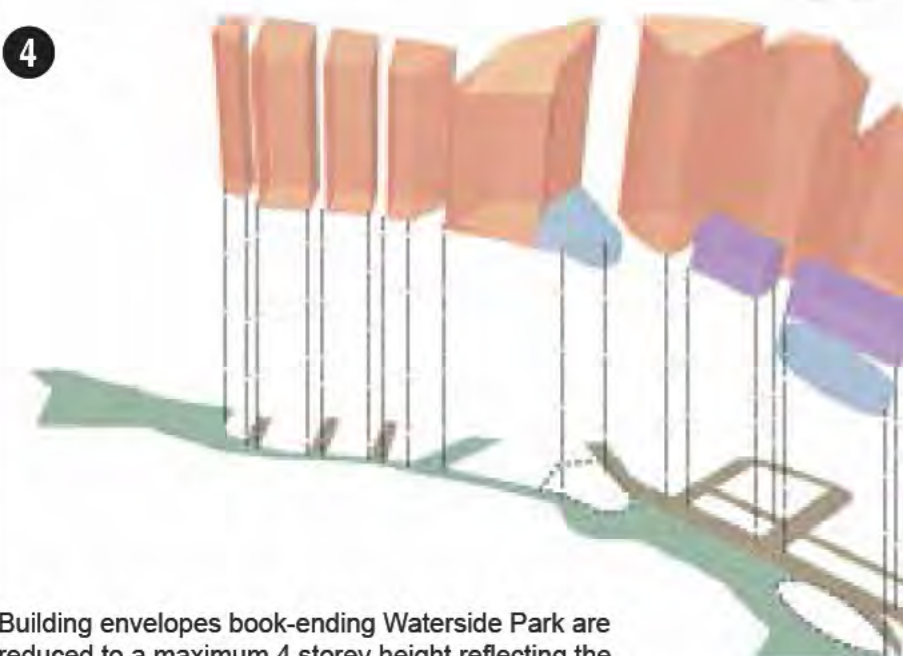
Deduction of desired open space and public domain network from the solar envelope. No built form is proposed to these zones which equate to 50% of the total site area.

3



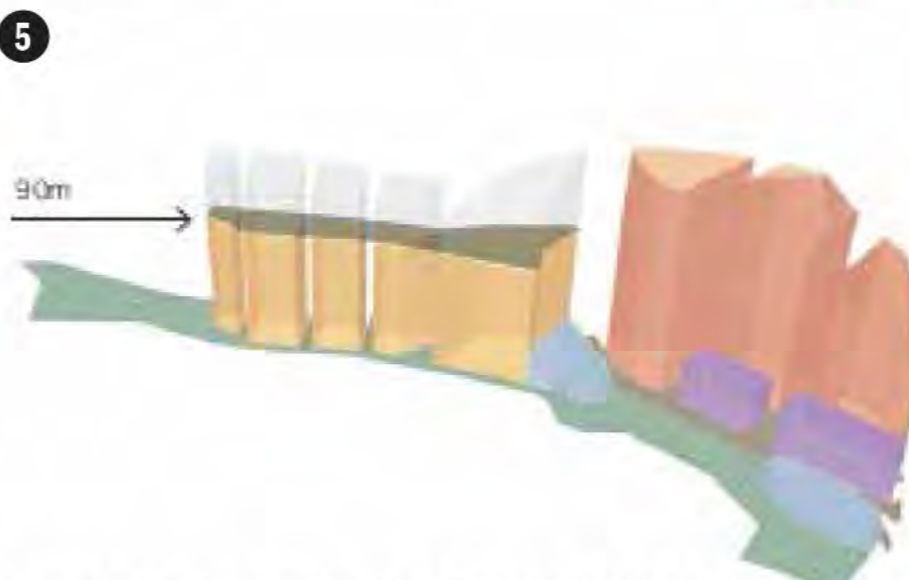
Reduction of built form scale around the primary new open space (Waterside Park) and related to existing warehouse buildings along Wattle Street.

4



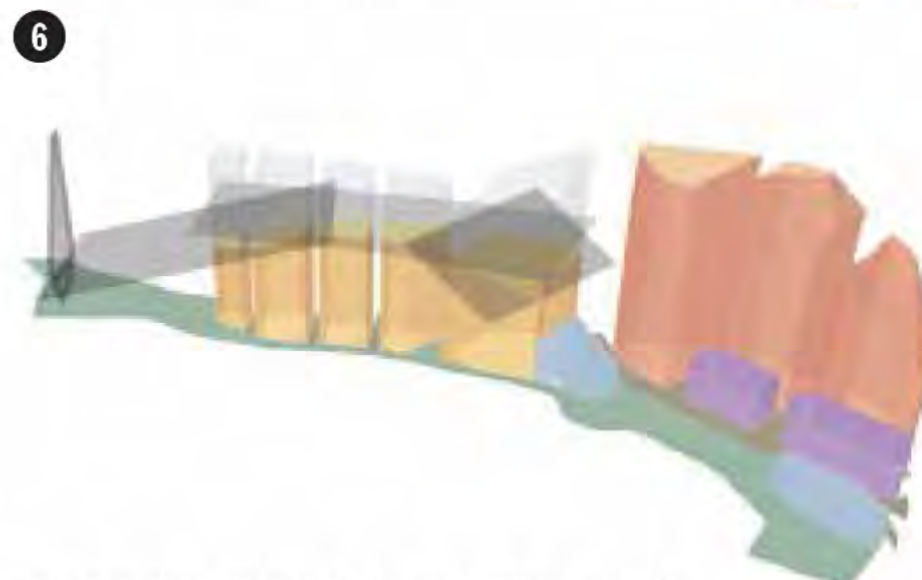
Building envelopes book-ending Waterside Park are reduced to a maximum 4 storey height reflecting the height of the new Sydney Fish Market and existing buildings along Miller Street and Bridge Road.

5



Private Land Owner sites (Area 2) is limited to RL 90m to align with existing towers in Distillery Hill, while maintaining the prominence of the Anzac Bridge Pylons and minimising overshadowing of the Glebe Foreshore before 9am on June 21st.

6



Area 2 envelope amended to step the built form down to the Bank Street open space and to Waterside Park. The adjustment is critical to improving the mid-winter solar performance of Waterside Park.

Figure 1.2.10 / Building envelope development diagrams provided by INSW under the BWB SSP Urban Design Statement (FJMT)

BWB HEIGHT STRATEGY

The NSW Government is planning for the renewal of Blackwattle Bay to deliver an authentic, vibrant and sustainable place connected to Sydney's iconic harbour.

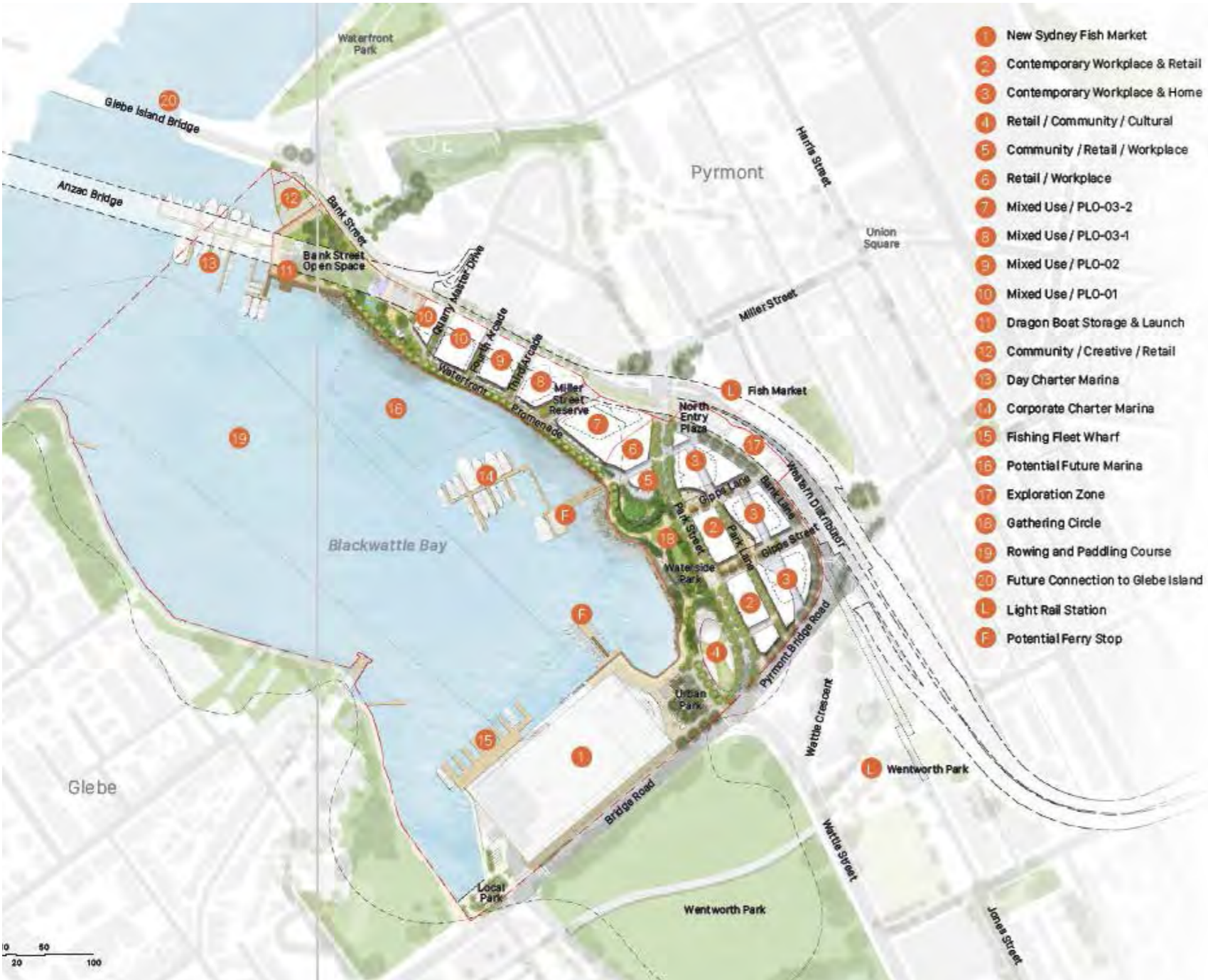


Figure 1.2.11 / BWB SSP Illustrative Masterplan provided by INSW under the BWB SSP Urban Design Statement (FJMT)

The BWB SSP proposal also includes potential development heights that range from +21.00 AHD to +156.00 AHD (capped by the Sydney OLS requirement) in this

proposal. Specifically, the potential tower developments range from +65.00 AHD up to the +156.00 AHD. The total GFA achieved is 234,100m2.

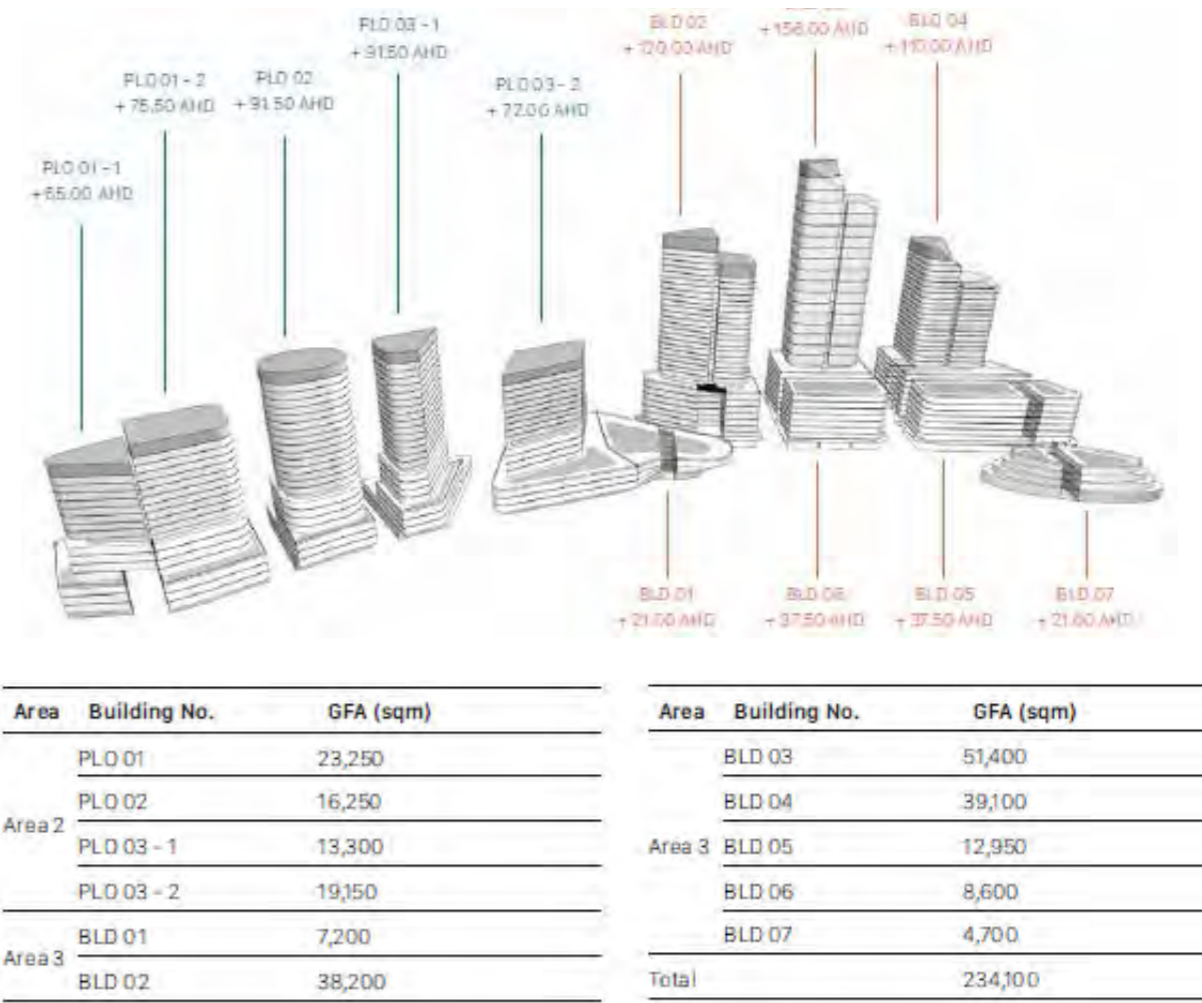


Figure 1.2.12 / BWB SSP proposed building envelopes, heights and floorspace provided by INSW under the BWB SSP Urban Design Statement (FJMT)

HEIGHT REVIEW

COMPARISON OF PPPS AND BWB SSP

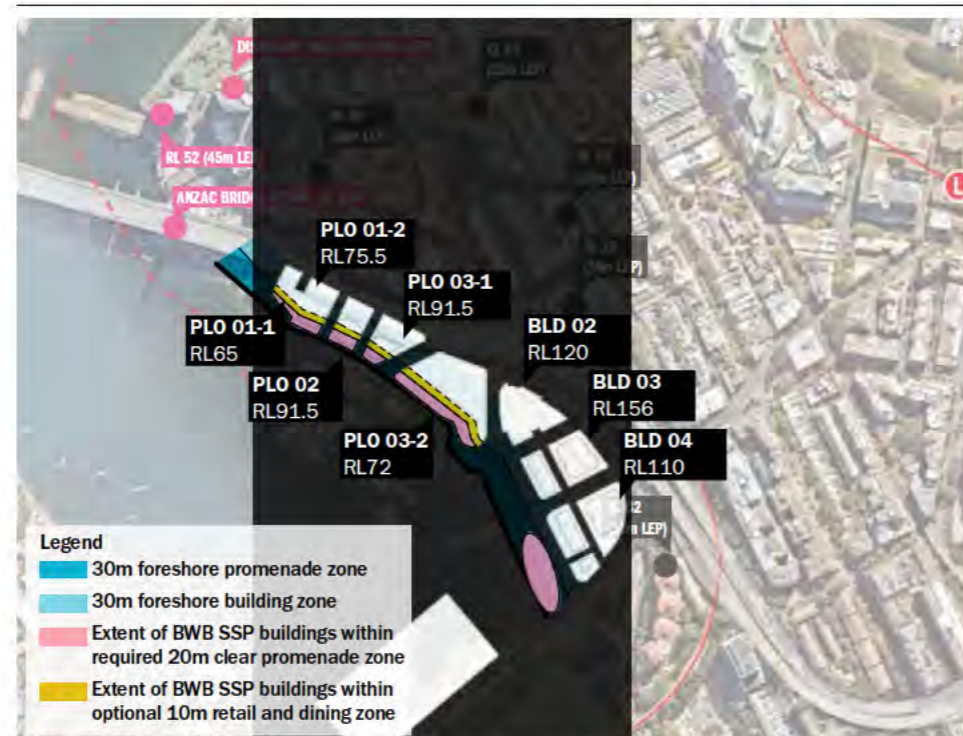
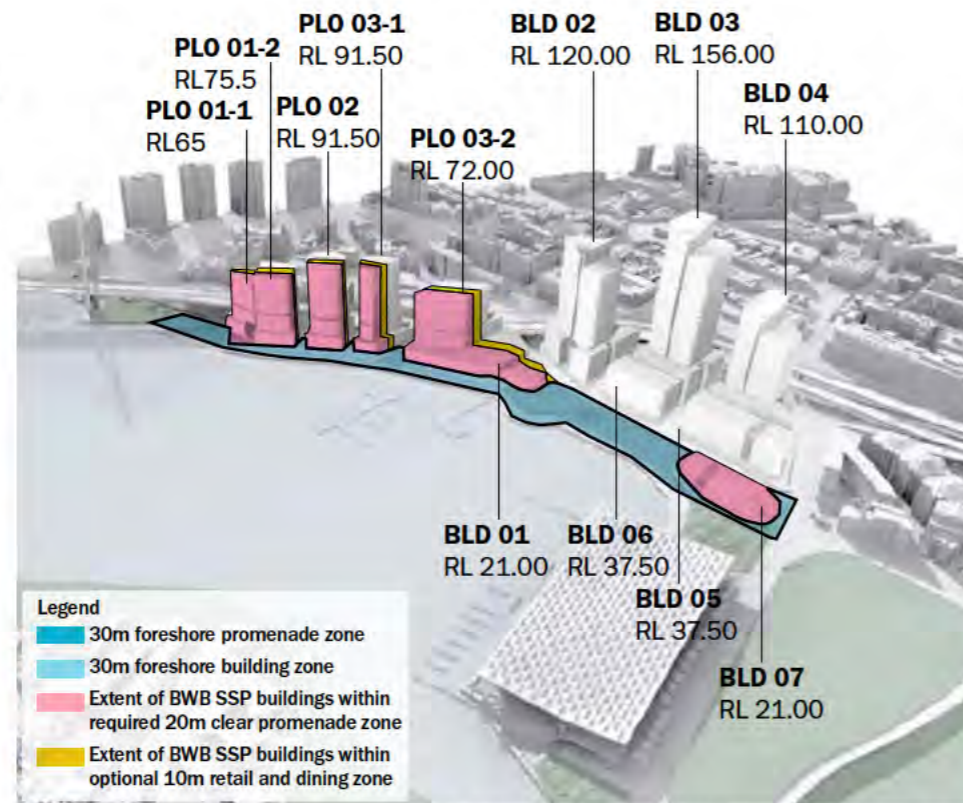
HEIGHT REVIEW

Bay Interface

The bay interfaces are key areas within the Pyrmont Peninsula of recreation, gathering and celebration that centre on the water which is actively used for civic and sporting events as well as other water based activities.

The PPPS defines the following expectations for the Bay Interface to ensure NSW Government's strategic objectives for the waterfront can be met:

- a foreshore setback of 20m must be provided as public open space exclusive of dining areas
- an additional 10m zone should be provided where the orientation and adjacent use is appropriate for dining areas associated with retail tenancies potentially within a colonnaded under-croft (min 9m clear height)
- a further 30m of foreshore building limited to RL35 in height with taller buildings permitted in this zone only where clear public benefit and waterfront amenity is demonstrated.



Summary of BWB SSP Proposal:

- A foreshore setback of 10m is proposed to building podiums for properties north of Miller Street is 10m (Buildings PLO 01, PLO 02, PLO 03, BLD 01).
- A foreshore setback of 17m is indicated in illustrative sections to the ground floor on properties north of Miller Street however this is not a stated requirement of built form in the submitted documentation (Buildings PLO 01, PLO 02, PLO 03, BLD 01).
- A foreshore setback of 13m is indicated to tower forms on properties north of miller street however this is not a stated requirement of built form in the submitted documentation (Buildings PLO 01, PLO 02, PLO 03, BLD 01).
- A community building is proposed at the Wattle Street intersection which is entirely within the foreshore area and relies on land reclamation associated with the new Sydney Fish Markets to enable a foreshore promenade. The exact setback to this building is unclear in the submitted documentation (BLD 07).
- 15m separation is proposed between towers above the podium creating a consistent wall of development on the waters edge for properties north of Miller Street (Buildings PLO 01, PLO 02, PLO 03).

PPPS Objective

A foreshore setback of 20m must be provided as public open space exclusive of dining areas

An additional 10m zone should be provided where the orientation and adjacent use is appropriate for dining areas associated with retail tenancies potentially within a colonnaded under-croft (min 9m clear height)

A further 30m of foreshore building limited to RL35 in height with taller buildings permitted in this zone only where clear public benefit and waterfront amenity is demonstrated.

BWB Alignment

- ✓ Proposal is aligned with PPPS objectives
- Proposal could be aligned with PPPS subject to minor refinement
- ✗ Proposal is not aligned with PPPS objectives

X

-

X

Comment

- The proposed foreshore setback and promenade of 10m is inadequate when compared to NSW Government Objectives as articulated in the PPPS.
- The proposed foreshore setback and promenade of 10m is inadequate when compared to the foreshore references provided within the submitted urban design report by FJMT.
- An additional setback of 7m is indicated in illustrative sections to the ground floor on properties north of Miller Street however this is not a stated requirement of built form in the submitted documentation (Buildings PLO 01, PLO 02, PLO 03, BLD 01).
- The indicated clear height of 5.8m is inadequate but could be increased (Buildings PLO 01, PLO 02, PLO 03, BLD 01).
- Whilst the specific metrics are not met, alignment may be possible subject to design development.
- The proposed extent of towers above the podium creates a wall of development which is inconsistent with historical waterfront approvals within central Sydney of comparable foreshore setbacks.
- The proposed amenity to the waterfront is inadequate relative to the strategic objectives articulated in the PPPS for the waterfront experience.
- The public benefits and waterfront amenity likely to be delivered as a result of the reduced foreshore setback, are unlikely to justify exceeding RL35.

HEIGHT REVIEW

Height Transition Zone

This zone provides for a transition in heights between the Foreshore Area and Sun Access Plane Control Zone.

It commences at Union Street and Miller Street alignments and extends 120m north from, and parallel to, the centre line of Union Street to Bowman Street and Banks Street.

The extents of this zone are governed by existing towers at Distillery Hill to the West (bounded by Bowman and Banks Streets/Western Distributor) and the street block depths between Union Street and Pirrama Road to the east.

It recognises:

- a maximum height of RL90 along the northern boundary parallel with Union Street
- a maximum height of RL90 along Bowman Street reflecting the existing built heights at Distillery Hill
- a maximum height of RL90 along Banks Street between Bowman Street and Quarry Master Drive
- a potential progressive increase in height as the distance from Union Street and Miller Street reduces from the specified maximum.

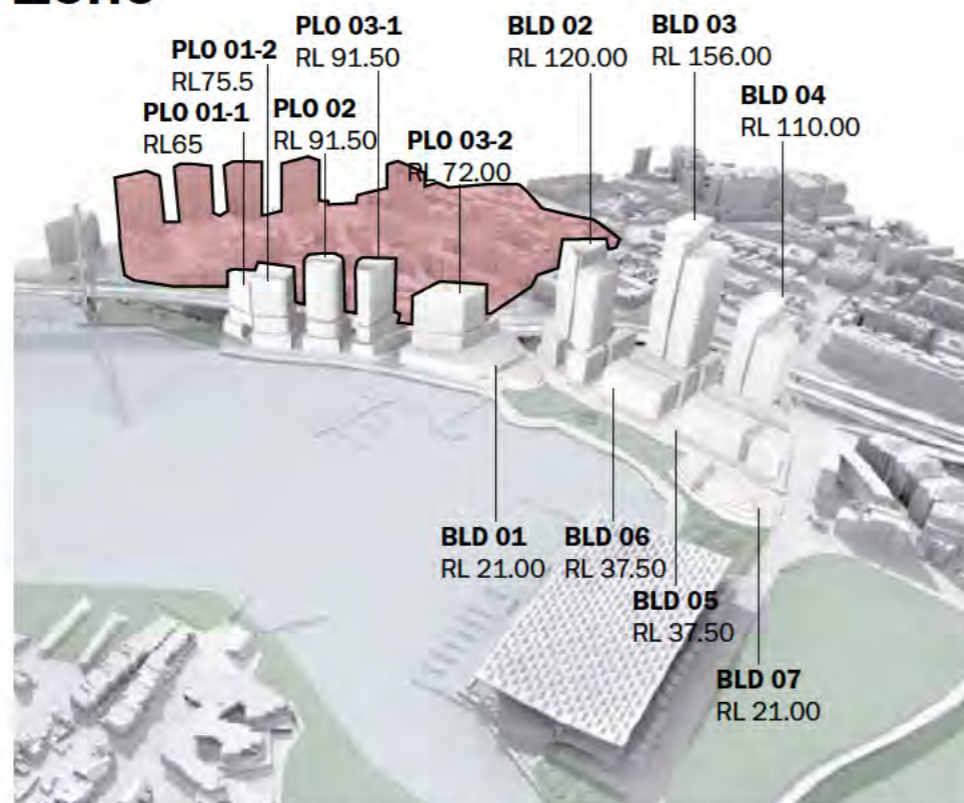


Figure 1.2.28 / 3d View of BWB SSP proposal noting height transition area defined under the PPPS Height Strategy (INSW with annotations by HASSELL)

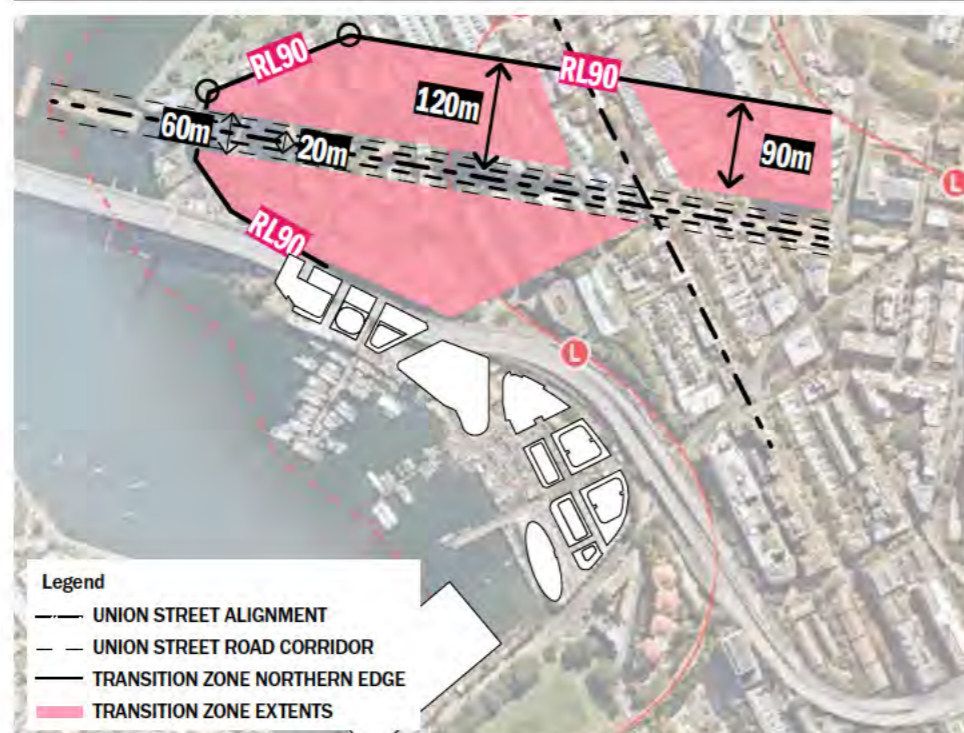


Figure 1.2.29 / Plan of BWB SSP proposal noting height transition zone area defined under the PPPS Height Strategy (HASSELL)

Summary of BWB SSP Proposal:

- BWB Urban Design Statement notes that taller buildings shall be located in the deeper sections of the Study Area with greater setback and transition to the waters edge.
- BWB Urban Design Statement provides heights on the waters edge north of Miller Street between RL65-RL91.5 referencing Distillery Hill (which has a greater setback from the waters edge) as a reference.

PPPS Objective

A maximum height of RL90 along the northern boundary parallel with Union Street

BWB Alignment

- ✓ Proposal is aligned with PPPS objectives
- Proposal could be aligned with PPPS subject to minor refinement
- ✗ Proposal is not aligned with PPPS objectives

Comment

✗

→ The Blackwattle Bay SSP sites is not located in the transition zone extents as it is substantially closer to the water's edge than existing taller buildings at Distillery Hill. Relevant benchmark heights are provided at 2 Bowman Street being RL52.

A maximum height of RL90 along Bowman Street reflecting the existing built heights at Distillery Hill

✗

→ Refer comments above.

A maximum height of RL90 along Banks Street between Bowman Street and Quarry Master Drive

✗

→ Refer comments above.

A potential progressive increase in height as the distance from Union Street and Miller Street reduces from the specified maximum.

-

→ A progressive increase of height from North to South is broadly provided within the proposal with the challenge being specific heights and extent and location of taller building mass proposed as opposed to absolute heights.
→ Alignment could be reached subject to further detailed interrogation.

HEIGHT REVIEW

Amenity to existing and committed open space

Maintaining sunlight to important public parks and places is a critical objective to maximise amenity and enjoyment of the city by the community.

Survey and analysis indicates that people's use and enjoyment of parks and places has a direct relationship with the extent of direct sunlight. People typically seek out the sun throughout most of the year, only seeking out shade in public places for a short period within summer.

There are two types of controls used within central Sydney which have been explored within the peninsula being:

1. Sun Access Planes (SAP)
2. Overshadowing of Certain Public Places (No Additional Overshadowing - NAO)

Since development of the PPPS in 2020, the Central Sydney Planning Framework has been exhibited which has extended the period of protection to open space beyond the winter solstice to throughout the year. This recognises that the times of greatest overshadowing to open space occurs between the equinox and Winter Solstice. This study has adopted this position in developing a potential outcome for a future peninsula experience.

There are three open spaces identified under the place strategy which have direct implications for potential height in Blackwattle Bay as follows:

Name	Hours of protection
1 Banks Street Park	10am-2pm
2 Sydney Fish Markets Square	12pm-2pm
3 Wentworth Park	10am-2pm

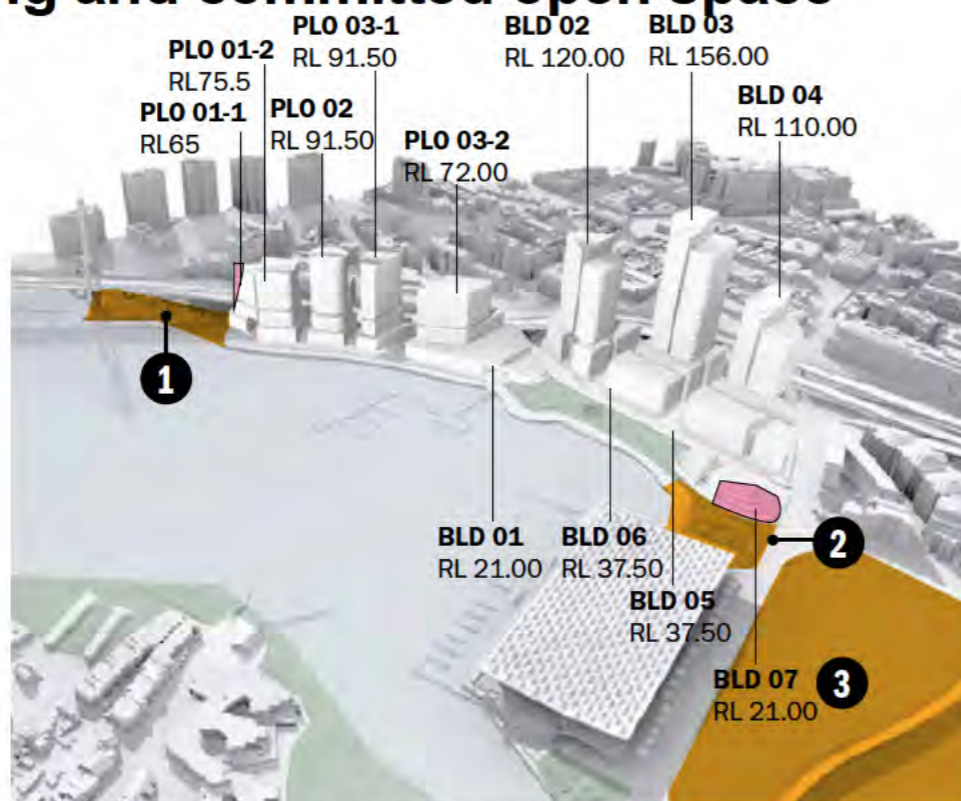


Figure 1.2.30 / 3d View of BWB SSP proposal noting open spaces with defined amenity requirements under the PPPS Height Strategy (INSW with annotations by HASSELL)



Figure 1.2.31 / Plan of BWB SSP with overlay of projected maximum heights to ensure protection of amenity to identified open spaces under the PPPS and noting areas of concern (HASSELL)

Summary of BWB SSP Proposal:

- BWB SSP urban design report notes a requirement to ensure no new overshadowing to Wentworth Park, Glebe Foreshore or Sydney Secondary College.
- No reference is made to overshadowing of the future Sydney Fish Markets Square.
- No reference is made to overshadowing of Banks Street Park.

PPPS Objective

No additional overshadowing beyond current permitted LEP heights to Banks Street Park between 10am-2pm

No additional overshadowing beyond current permitted LEP heights to future Sydney Fish Markets Square between 12pm-2pm

No additional overshadowing beyond current permitted LEP heights to Wentworth Park between 10am-2pm

BWB Alignment

- ✓ Proposal is aligned with PPPS objectives
- Proposal could be aligned with PPPS subject to minor refinement
- ✗ Proposal is not aligned with PPPS objectives

Comment

- Northern edge of proposed building PLO-01-1 is likely to cause additional overshadowing in the controlled hours of 10am-2pm on all days except the Winter Solstice
- Minor shaping of envelope in this zone will avoid increased overshadowing

- Proposed BLD 07 will cause additional overshadowing to future Sydney Fish Markets Square throughout the year.
- Reconfiguration of BLD 07 location or footprint will avoid projected overshadowing.

- Proposed building heights are not likely to cause additional overshadowing within the hours of control.

HEIGHT REVIEW

Amenity to proposed open space

Maintaining sunlight to important public parks and places is a critical objective to maximise amenity and enjoyment of the city by the community.

Survey and analysis indicates that people's use and enjoyment of parks and places has a direct relationship with the extent of direct sunlight. People typically seek out the sun throughout most of the year, only seeking out shade in public places for a short period within summer.

No controls were considered under the PPPS for future open spaces within BWB SSP area and so the following three criteria could be considered based upon Sydney LEP and DCP 2012 controls and the publicly exhibited Central Sydney Planning Strategy:

- Minimum sun access as per the PPPS of 10am-2pm throughout the year (4 hours minimum)
- Minimum sun access as per publicly advertised provision of the Central Sydney Planning Framework being 9am-3pm throughout the year (6 hours minimum)
- Minimum sun access per Sydney DCP section 3.1.4

It is important to recognise the proposed character of the open spaces, in particular waterside park. As landscaped open spaces:

- A minimum of 2 hours sunlight to tree canopies is necessary to support growth
- A minimum of 4 hours sunlight to grass is necessary to support growth.

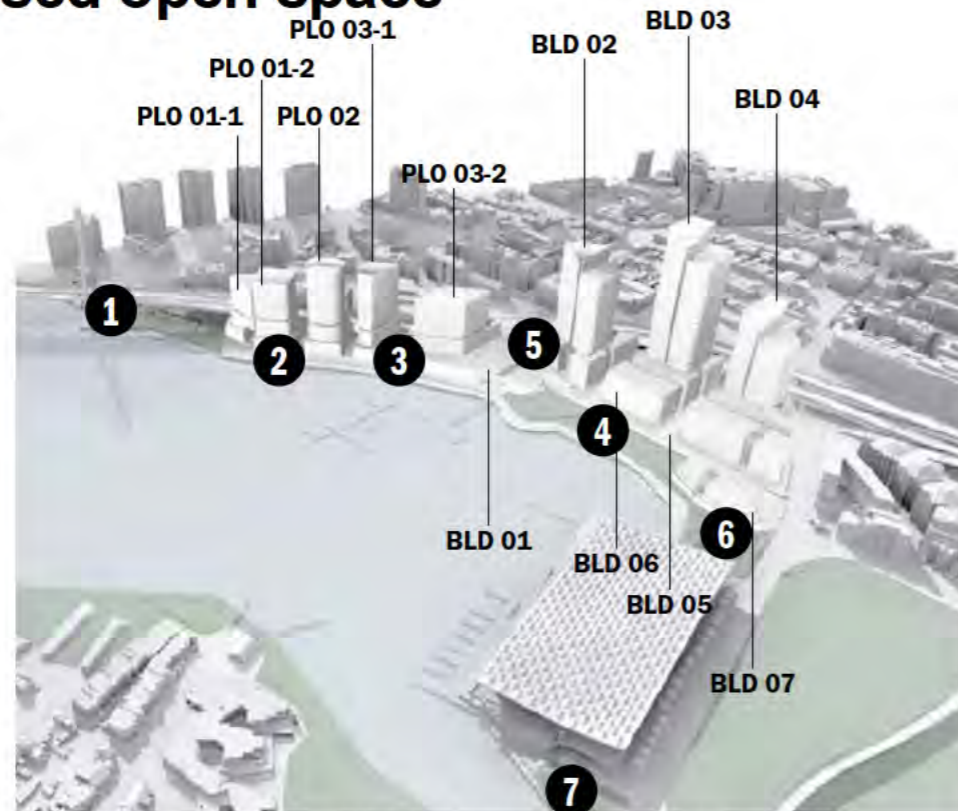


Figure 1.2.32 / 3d View of BWB SSP proposal identify proposed open spaces (INSW with annotations by HASSELL)

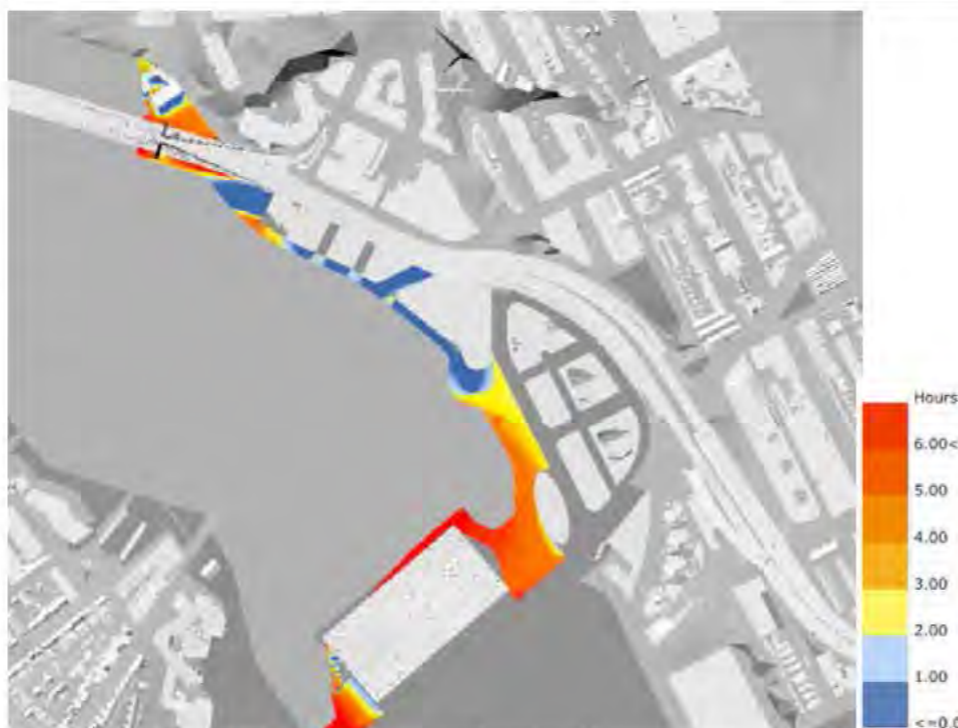


Figure 1.2.33 / Plan of BWB SSP with analysis of number of hours sunlight to open space as a result of proposed built form and open space arrangement (FJMT)

Summary of BWB SSP Proposal:

- Implementation of a ribbon of parks/open spaces with distinct characters linked by the waterfront promenade and street network.
- The ribbon identifies 7 open spaces all with different characters. These open spaces are:
 1. Bank Street Open Space
 2. Waterfront Promenade
 3. Miller Street Reserve
 4. Waterside Park
 5. North Entry Plaza
 6. Urban Park (Designed and delivered under separate SFM proposal)
 7. Local Park (Designed and delivered under separate SFM proposal)

- BWB SSP provides an assessment against the Sydney DCP provisions under 3.1.4 being:

"In relation to parks (i.e. non-linear public open space):

- (a) 50% of the total area is to receive sunlight for 4 hours from 9am to 3pm on 21 June;
- (b) protection from direct sun is to be available on 21 December for a minimum of 20% of the area used for passive recreation; and
- (c) protection from strong winds is to be provided, where practicable."

- The graphs provided on page 79 of Volume 2 of the BWB SSP Urban Design Statement indicates the minimum required hours of direct sunlight to open space are not achieved.

PPPS Objective

Minimum sun access as per PPPS of 10am-2pm throughout the year

Minimum sun access as per CSPS of 9am-3pm throughout the year

Minimum sun access per Sydney DCP section 3.1.4

BWB Alignment

- ✓ Proposal is aligned with PPPS objectives
- Proposal could be aligned with PPPS subject to minor refinement
- ✗ Proposal is not aligned with PPPS objectives

Comment

- Solar analysis is only provided for winter solstice. The exact boundaries of the open space are unclear and the categorisation of spaces that should receive the minimum hours of daylight are similarly ambiguous.
- Projected amenity for open space within the SSP boundaries will not meet the minimum 4 hours sunlight

- refer comments above

- Solar analysis is only provided for winter solstice. The exact boundaries of the open space are unclear and the categorisation of spaces that should receive the minimum hours of daylight are similarly ambiguous.
- The calculation of performance relies on the inclusion of open space approved under SSD-8925 and not part of the open space and built form approval being sought under the SSP.
- Projected amenity for open space within the SSP boundaries will not meet the minimum provisions particularly when excluding open space approved under SSD-8925

HEIGHT REVIEW

Wind Impacts

Comfortable wind conditions at the ground plane are critical for supporting safety of cyclists and pedestrians as well as supporting activation of building edges at the ground plane and the use of podium rooftops.

The PPPS adopts the minimum setbacks for towers under the Sydney DCP 2012 being minimum 6m, maximum 10m and an average of 8m in recognition of poor wind environments at ground level as a result of taller exposed built form.

No specific criteria are provided under the PPPS for wind comfort criteria however it is reasonable to expect the following:

- All active retail frontages and open spaces should be able to support outdoor dining.
- All local streets should be able to support pedestrian sitting.
- All major roads should be able to meet pedestrian walking.

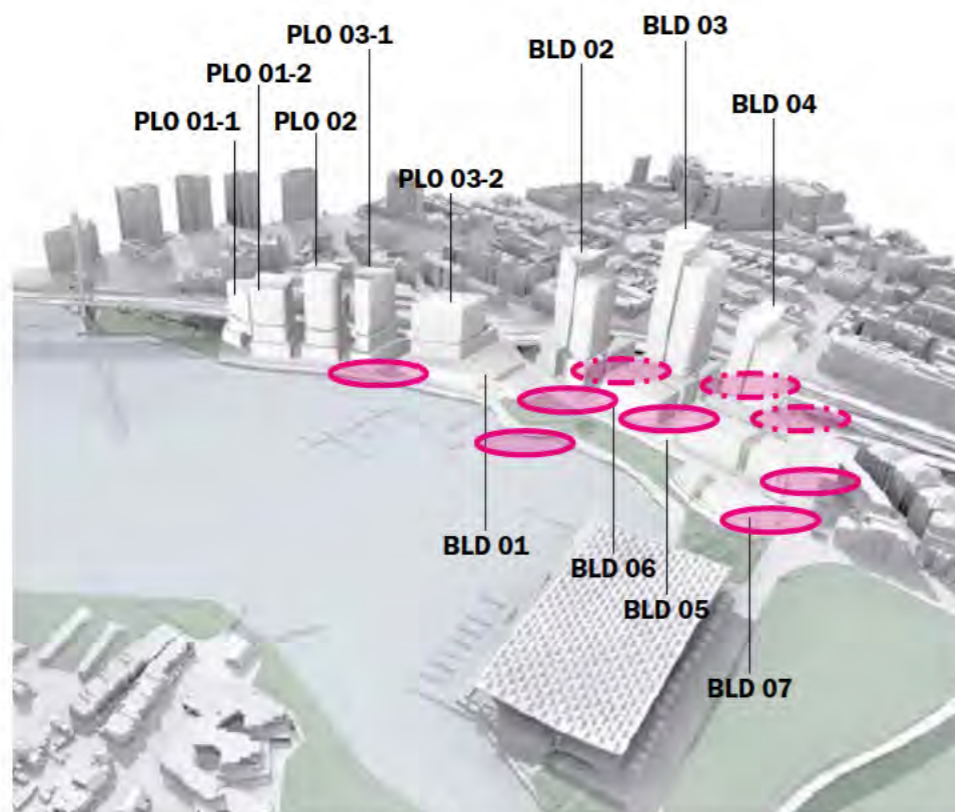


Figure 1.2.34 / 3d View of BWB SSP proposal identify zones of concern identified in the submitted wind report (INSW with annotations by HASSELL)

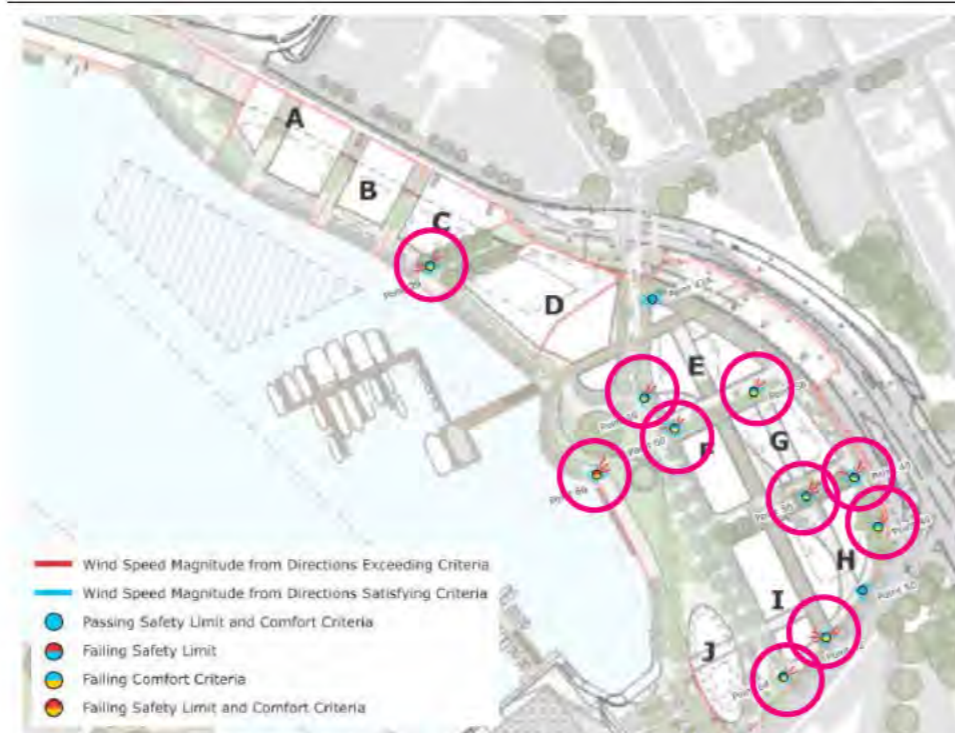


Figure 1.2.35 / Plan of BWB SSP showing outcomes of wind analysis following application of treatments highlighting areas where performance criteria are not met (INSW with annotation by HASSELL)

Summary of BWB SSP Proposal:

- The assessment undertaken by Windtech notes on Figure 5 that target criteria for all points are in accordance with "Draft Sydney DCP 2012 - Central Sydney Planning Review Amendment" as follows:
 1. Wind Comfort Standard for Walking Criterion of 8 m/s (5% exceedence) for walking
 2. Safety criterion of 24 m/s (gust - 0.1% exceedence) for safety.
- The assessment undertaken by Windtech on the proposed design with modifications for wind notes under Table 7 and Figure 8 multiple points which do not meet the identified comfort criteria for walking at multiple locations within and around the SSP and aligned to key pedestrian routes and unsafe wind conditions at the waterfront park.
- No locations are identified for sitting or outdoor dining under the minimum criteria to be met by the master plan design.

PPPS Objective	BWB Alignment	Comment
Minimum setbacks above street wall height in accordance with Sydney LEP and DCP 2012	X	<ul style="list-style-type: none"> → Proposed tower setbacks are consistently smaller than minimums and averages outlined by the Sydney LEP 2012 and DCP 2012.
All active retail frontages and open spaces should be able to support outdoor dining.	X	<ul style="list-style-type: none"> → The minimum criteria for all locations has been set at pedestrian walking which is not deemed appropriate. → The comfort of open spaces and active retail frontages has not been identified however based upon provided assessment it is not expected to meet a desired wind environment that would support outdoor dining.
All local streets should be able to support pedestrian sitting	X	<ul style="list-style-type: none"> → The minimum criteria for all locations has been set at pedestrian walking which is not deemed appropriate. → The comfort of local streets has been analysed according to pedestrian walking only and is not expected to meet a desired wind environment that would support pedestrian sitting.
All major roads should be able to meet pedestrian walking.	X	<ul style="list-style-type: none"> → The analysis provided indicates the interface with Pyrmont Bridge Road, Banks Street and primary pedestrian routes into the precinct will not meet minimum comfort criteria for pedestrian walking based upon the modified built form.

HEIGHT REVIEW

Relationship to topography and heritage

Pyrmont Peninsula is a place strongly defined by the sandstone escarpments left over from extensive quarrying.

The strong presence of the landscape is further layered with evidence of heritage from all stages of Sydney's development and with multiple typologies including:

- Sandstone rock faces exposed through historical quarrying
- Sandstone rock faces exposed through tunnelling for rail infrastructure servicing the historical wharfs along Darling Harbour
- Mid scale heritage warehouses
- Low scale heritage terraces, shops and pubs.

The site is adjacent to and will be highly visible from the adjacent 'Pyrmont Heritage Conservation Zone' which is described under Sydney DPC 2012 as follows:

"The area dates from one of the key period of layers for the development of Pyrmont as a direct result of subdivision of the Harris and Macarthur Estates. It is a good example of a mid to late Victorian working class community consisting of both residential and commercial buildings which are largely intact and make a positive contribution to the streetscape."

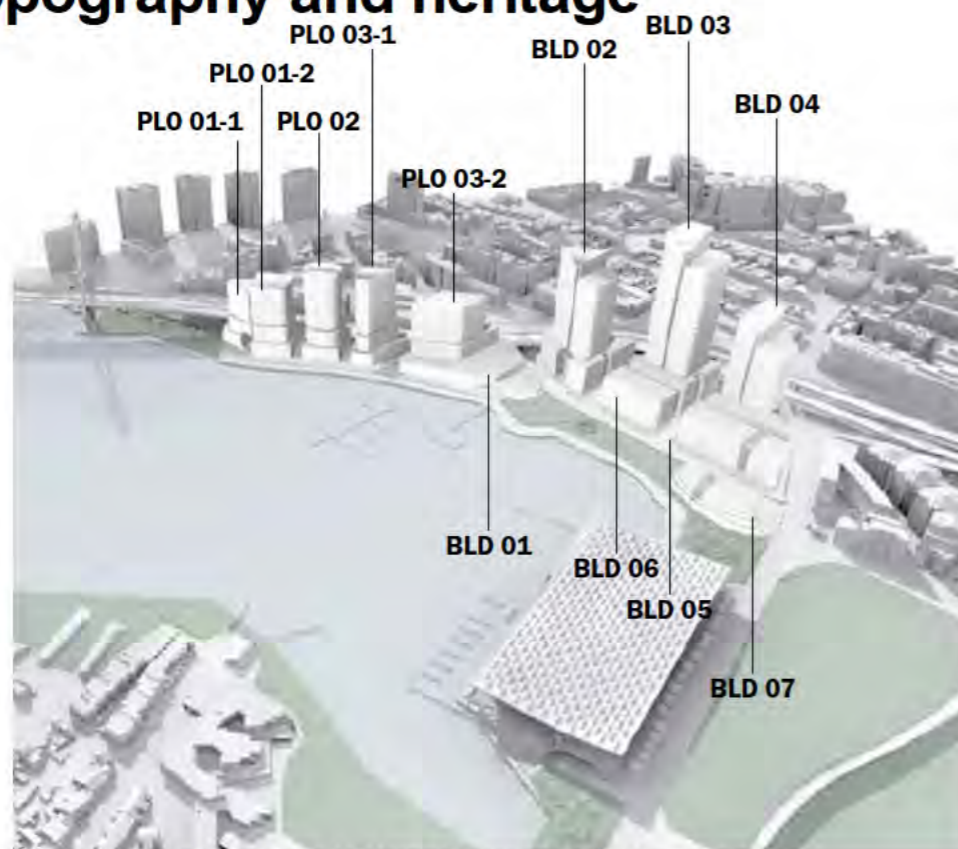


Figure 1.2.36 / 3d View of BWB SSP Master Plan proposal (INSW)



Figure 1.2.37 / Plan of BWB SSP overlaid on contour plan of the peninsula and highlighting environmental heritage (HASSELL)

Summary of BWB SSP Proposal:

- The BWB SSP Urban Design Report provides a series of observations on land form within the peninsula including:
 - Landform characterised by sandstone bluffs to the north.
 - Erosion by coastal streams, swamps, marshland, has created a landscape of deep cliffs and remnant plateaus
 - The topography was characterised by harbour edges and platforms
 - Headland landform wraps around from the north to south east.
 - Behind Wentworth Park slope gradients became more gentle, leading down to the estuarine mouth where reclaimed land exists.
 - Opportunity to create areas of open space sheltered by landform.
 - Site offers access to water
 - Elements of moulded sandstone are utilised to create landform to further structure and subdivide the development and its individual programs.
- Specific discussion of eroded forms is provided in justifying the form of BLD01
- Heritage is regularly noted within the site analysis only.

PPPS Objective

Respond to topography in the development of new built form and assessment of appropriate heights

Respond to heritage context in the development of new built form and assessment of appropriate heights

BWB Alignment

- ✓ Proposal is aligned with PPPS objectives
- Proposal could be aligned with PPPS subject to minor refinement
- ✗ Proposal is not aligned with PPPS objectives

Comment

- The majority of the SSP Area is located on reclaimed land with substantial distance to existing sandstone escarpments.
 - No response to the topography is evident within the proposed design with the exception of a specific discussion of an eroded form to BLD01.
- X**
- Reference is made only to the scale of heritage warehouses along Wattle Street at some distance from the site in defining the low rise building heights and podium level.
 - No reference is made to the adjacent heritage conservation zone and heritage items.
 - No drawings are provided which show the sectional relationship between proposed buildings and adjacent low scale residential dwellings.

HEIGHT REVIEW

Overshadowing on adjacent residential

The PPPS recognises NSW Government policy for protection of amenity to residential dwellings as specified under the NSW apartment design guidelines which requires:

- Living rooms and private open spaces of at least 70% of apartments in a building receive a minimum of 2 hours direct sunlight between 9am and 3pm at mid winter [the “2 hours of sun” category];
- A maximum of 15% of apartments in a building receive no direct sunlight between 9am and 3pm at mid winter [the “no sun” category]; and
- Developments achieve a minimum of 50% direct sunlight to the principal usable part of the communal open space for a minimum of 2 hours between 9pm and 3pm on 21 June (mid winter)

A process for assessing impact and minimising overshadowing is set out under the City of Sydney's DRAFT Minimising Overshadowing of Neighboring Apartments - Documentation Guide.

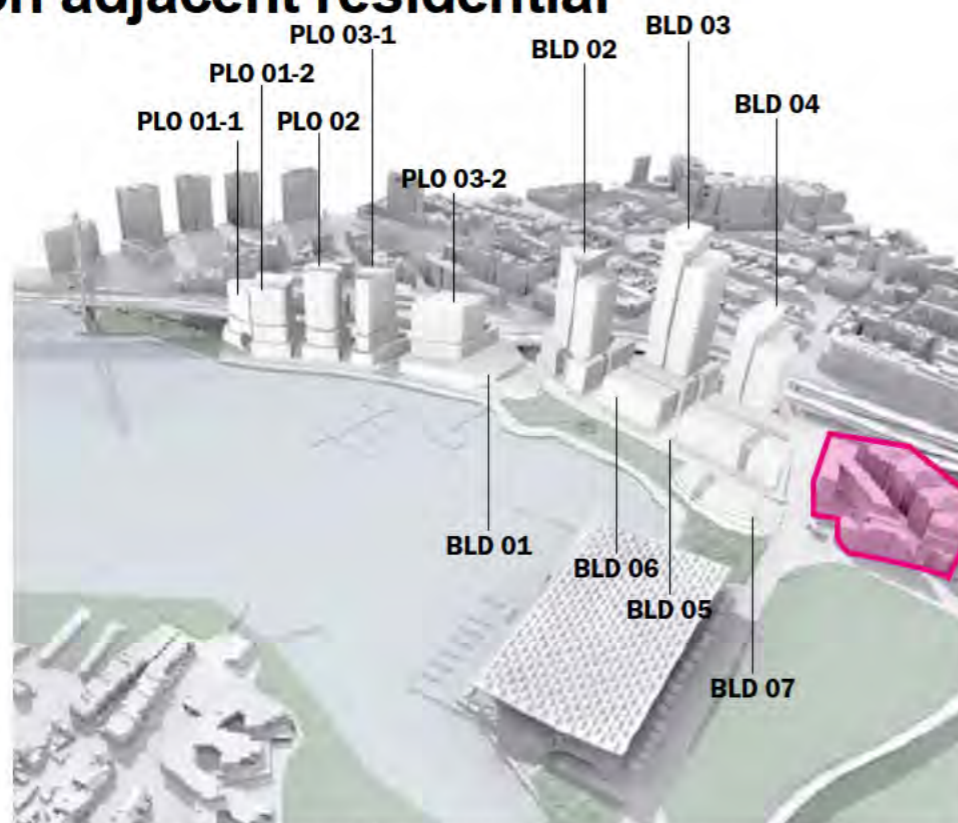


Figure 1.2.38 / 3d View of BWB SSP Master Plan proposal noting key residential properties impacted by the master plan proposal (INSW)

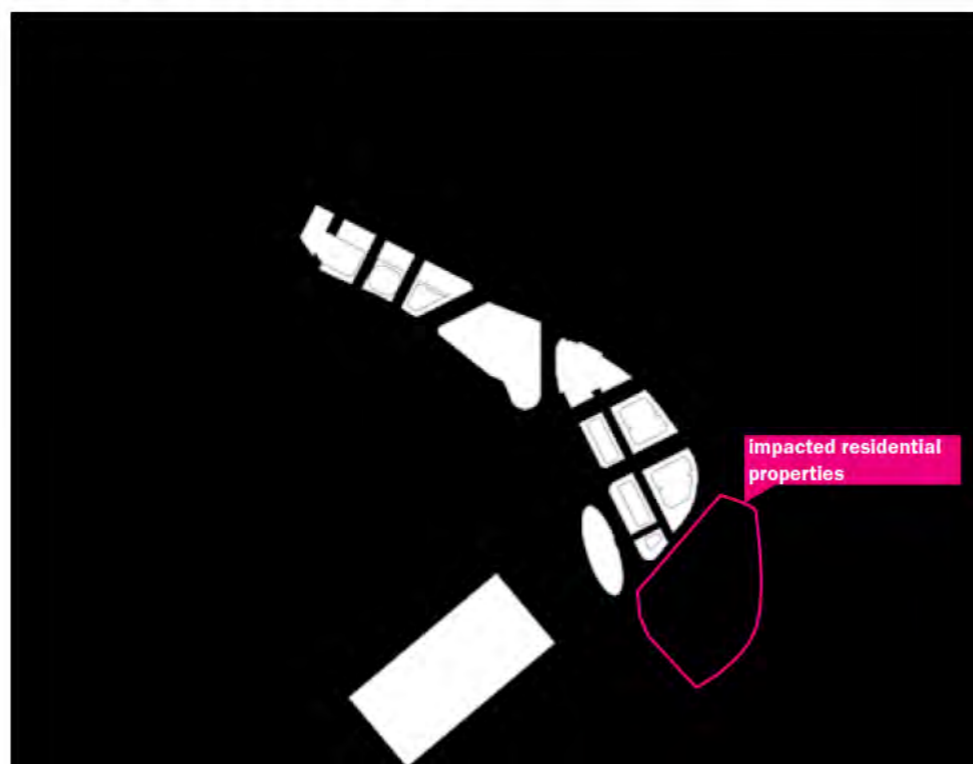


Figure 1.1.39/ Extract of BWB SSP Urban Design Statement showing plan of overlaid shadows on the winter solstice as cast by proposed built form at 9am, 12pm and 3pm (INSW)

Summary of BWB SSP Proposal:

- The analysis cited in the BWB SSP indicates that neighbouring residential properties can maintain good solar amenity without unduly constraining the opportunity for an employment hub and mixed use quarter in Blackwattle Bay.
- No analysis of existing compliance of individual dwellings with minimum solar access requirements set out under ADG is provided.
- No analysis of future compliance of individual dwellings with minimum solar access requirements set out under ADG is provided.

PPPS Objective

Living rooms and private open spaces of at least 70% of apartments in a building receive a minimum of 2 hours direct sunlight between 9am and 3pm at mid winter [the “2 hours of sun” category];

A maximum of 15% of apartments in a building receive no direct sunlight between 9am and 3pm at mid winter [the “no sun” category]; and

Developments achieve a minimum of 50% direct sunlight to the principal usable part of the communal open space for a minimum of 2 hours between 9pm and 3pm on 21 June (mid winter)

BWB Alignment

- ✓ Proposal is aligned with PPPS objectives
- Proposal could be aligned with PPPS subject to minor refinement
- ✗ Proposal is not aligned with PPPS objectives

Comment

→ Overshadowing analysis of impacted residential facades are shown from a single view point only. These indicate a substantial increase in overshadowing of existing residential developments with large portions of the illustrated facades not achieving 2hrs direct sunlight.

→ No analysis is provided of existing number of apartments which achieve the minimum required amenity, total number of affected apartments and change in performance.

→ No analysis is provided of existing number of apartments which achieve the minimum required amenity, total number of affected apartments and change in performance.

→ No analysis is provided locating existing communal open spaces on adjacent residential developments,

HEIGHT REVIEW

View Impacts

The PPPS recognises the importance of views in reinforcing the unique local experience through supporting:

- Visibility of prominent landmarks;
- Visibility to open spaces and water at the end of streets
- Supporting wayfinding
- Enhancing the experience of public open space and providing an appropriate level of visual enclosure

The view corridors identified under the original City West master plan have been reconfirmed under the PPPS as well as highlighting the importance of making visible water and open space at the termination of streets which lead from the ridge to the valley.

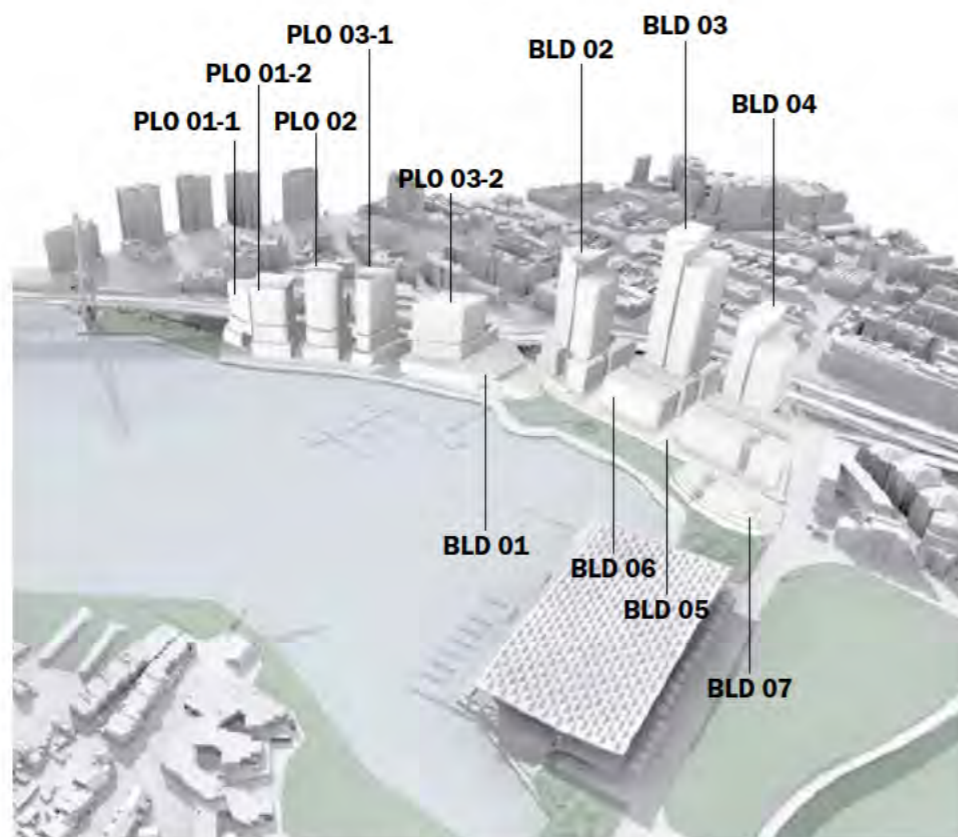


Figure 1.2.40 / 3d View of BWB SSP Master Plan proposal (INSW)



Figure 1.2.41 / Plan of BWB SSP noting views and level of impact assessed for identified views in the submitted visual impact assessment report (INSW)

Summary of BWB SSP Proposal:

- A visual impact assessment was undertaken by Clouston Associates which found that of the 20 viewpoints selected:
 - One viewpoint with a negligible rating
 - One viewpoint with a low rating
 - Six viewpoints with a moderate/low rating
 - Three viewpoints with a moderate rating
 - Six viewpoints with a high/moderate rating
 - Three viewpoints with a high rating.
- The report concludes that the view impacts are acceptable based upon implementation in the design stage of:
 - Reduction: through providing a range of building heights
 - Alleviation: through future building articulation and specialist input on reflectivity and building lighting.
 - Alleviation: through landscape planting which will obscure or improve the setting of the proposed built form from certain views.

PPPS Objective	BWB Alignment	Comment
Visibility of prominent landmarks	-	→ The proposed development has maintained the view corridors identified under the original City West Master Plan however further consideration of the visibility of the Anzac Bridge Pylon and suspension wires is required including the proposed height and mass of building of PLO 01-01.
Visibility to open spaces and water at the end of streets	✓	→ The proposed development maintains views to open spaces and vistas to water at the end of streets.
Supporting wayfinding	-	→ Height is generally greatest at key entries into the site. → Further development of the Miller Street interface to recognise the importance of movement either along banks street to Glebe Island Bridge and White Bay or towards the Sydney Fish Markets should be undertaken.
Enhancing the experience of public open space and providing an appropriate level of visual enclosure	X	→ The street experience on local streets and foreshore promenade appears out of scale in most locations with very narrow streets relative to the proposed building heights and tower setbacks.

- ✓ Proposal is aligned with PPPS objectives
- Proposal could be aligned with PPPS subject to minor refinement
- X Proposal is not aligned with PPPS objectives

HEIGHT REVIEW

Alignment with EDS for Proposed Land Use

To enable the potential economic development strategy and population projections to be realised, a broad approach to land use has been defined which informs the types of development to be enabled in different areas of the Peninsula.

In addition to containing successful high density residential communities, the Peninsula has a role in enabling the innovation corridor, and connecting the employment zones between the Sydney CBD and the future Bays West.

To do this it is important that key employment clusters are maintained and expanded by intensifying and diversifying floor space and building types around the future Metro Station and Ultimo/Central Station.

In between these zones, a range of mixed uses support the Tourism, Entertainment, Professional and Knowledge Services to enhance and expand the visitor economy, the innovation cluster that supports creative and cultural industries and premium quality office accommodation for professional services. These spaces are along the Peninsula edges and connected by the Active Transport Loop to provide a balanced outcome with the adjacent residential zones.

BWB SSP and the overall Blackwattle Bay Sub-precinct is key to delivering a critical mass of employment floor space and supporting a continuous employment corridor between Sydney CBD and White Bay.

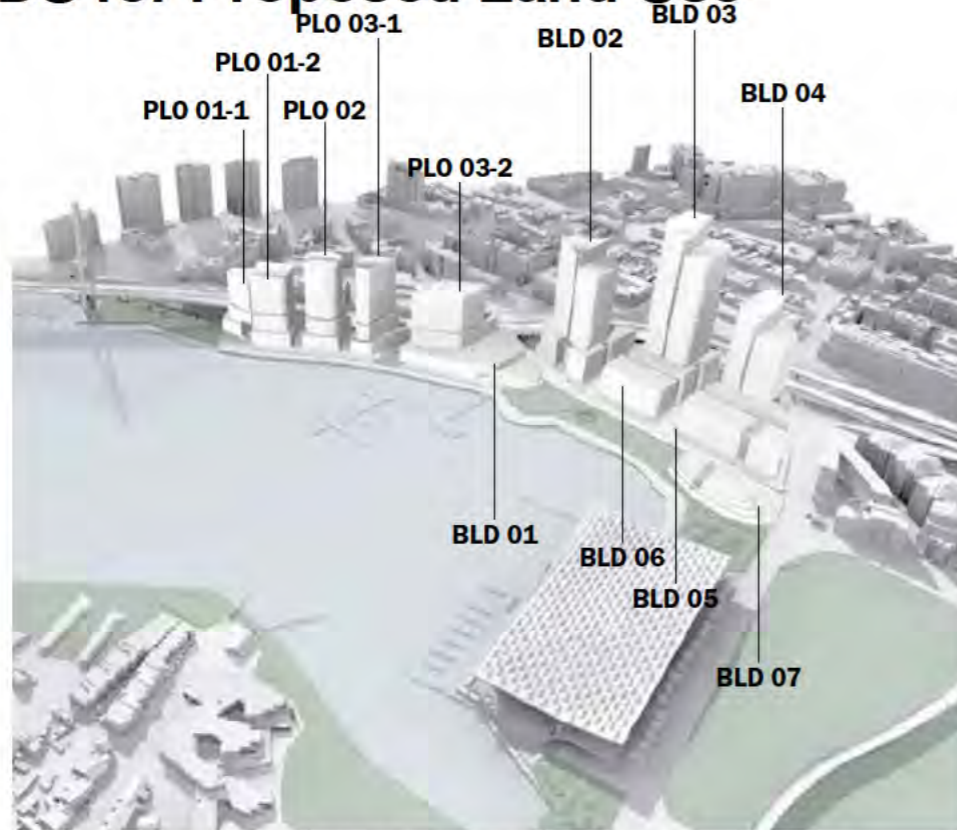


Figure 1.2.40 / 3d View of BWB SSP Master Plan proposal (INSW)

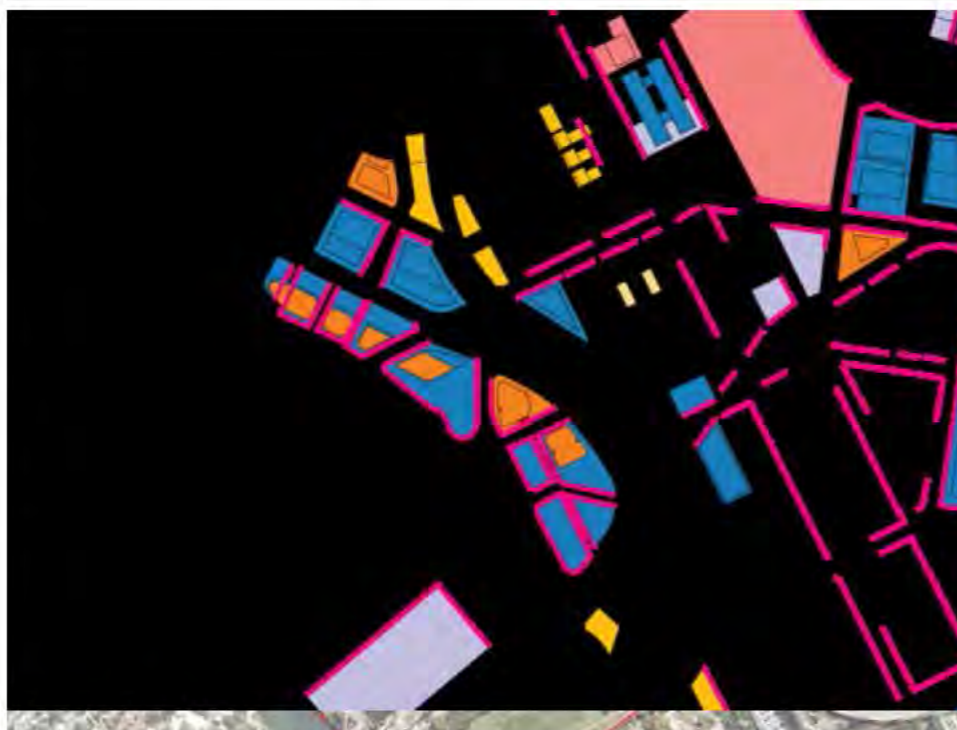


Figure 1.2.41 / Plan of BWB SSP and immediate context identifying land use and building typologies (HASSELL)

Summary of BWB SSP Proposal:

- The Pyrmont Peninsula Economic Development Strategy (EDS) or the Blackwattle Bay State Significant Precinct Economic Development, Local Retail and Services Study is not mentioned in the Urban Design Report or master plan response.
- A proposed floor space mix of 55% residential and 45% non-residential is proposed with all commercial floorspace being low level podium buildings.

PPPS Objective

Provide a diversity of floorspace aligned to the Pyrmont Peninsula Economic Development Strategy which supports the innovation economy

BWB Alignment

- ✓ Proposal is aligned with PPPS objectives
- Proposal could be aligned with PPPS subject to minor refinement
- ✗ Proposal is not aligned with PPPS objectives

Comment

- The proposed development generally provides only two types of floorspace, high rise residential and low rise large footprint commercial floorspace.
- Height is allocated to residential towers above a commercial podium which reduces the requirements for cross-ventilation of residential apartments and reduces residential interfaces with the motorway.
- Alternative floorspace and building typologies should be explored including commercial office towers

Legend - Proposed Land Use

- High Rise Commercial
- Low Rise Commercial
- Tourism and Entertainment
- Education / Commercial Campus
- Mixed Use - High Rise
- Mixed Use Low Rise
- Low Rise Residential
- Medium Rise Residential
- High Rise Residential
- Active Frontage

HEIGHT REVIEW

Streetscape Experience

In developing the PPPS, an extensive study of existing street elevations was undertaken along with projected street amenity for enclosure (sky view factor) and solar access based upon:

- existing built form
- existing LEP permitted heights
- 1:1 street width to street wall height
- 35m street wall height
- 45m street wall height

The result of this study found that:

- 1:1 street width to street wall height generally provides optimum amenity throughout the peninsula
- areas where there is already limited amenity because of infrastructure (including Banks Street) could accommodate a greater street wall height
- 45m street wall height to Banks street would support podium level commercial floorspace
- Asymmetrical street setbacks should be explored to optimise street amenity and building potential due to NorthWest/SouthEast orientation of the peninsula
- Strengthen the existing condition of a similar maximum RL in height for small buildings on the ridge and taller buildings on the edge as a result of the changing topography.
- All setbacks above the identified street wall heights would be consistent with Central Sydney controls of 6-10m based upon wind conditions at street level.

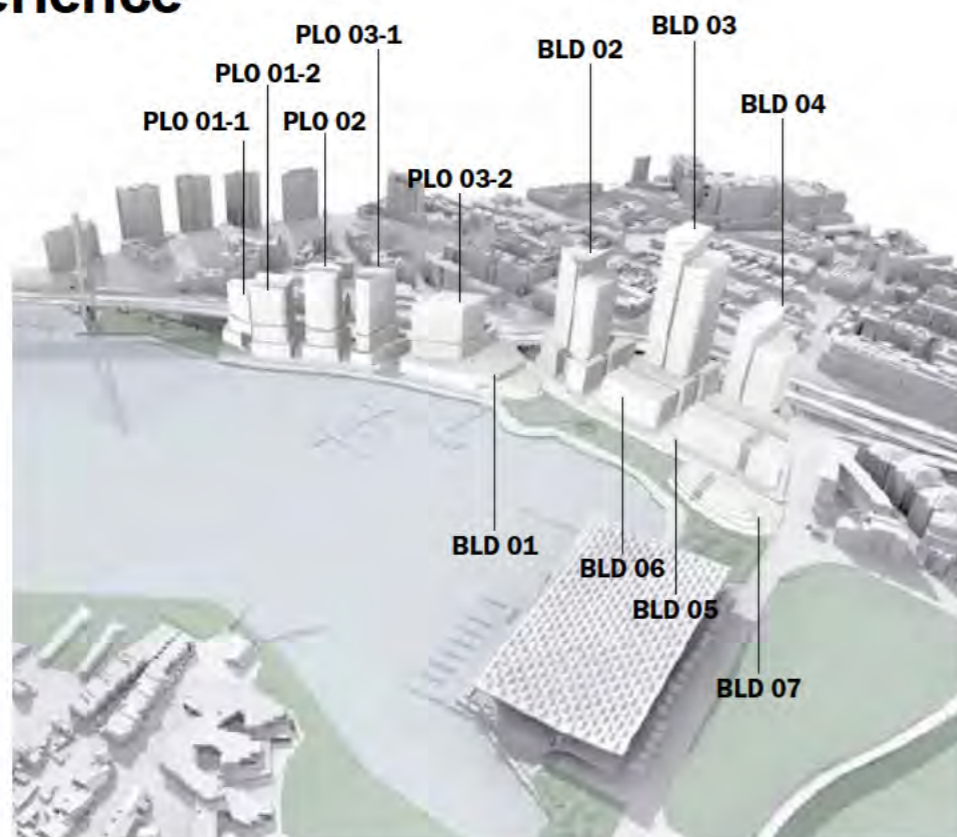


Figure 1.2.42 / 3d View of BWB SSP Master Plan proposal (INSW)



Figure 1.2.43 / Existing sky view factor and direct solar access in mid-winter to streets around BWB SSP (HASSELL)

Summary of BWB SSP Proposal:

- There is no analysis or discussion of future street amenity

PPPS Objective

1:1 street width to street wall height generally

BWB Alignment

- ✓ Proposal is aligned with PPPS objectives
- Proposal could be aligned with PPPS subject to minor refinement
- ✗ Proposal is not aligned with PPPS objectives

Comment

✗

- Some streets comply though most streets appear to have a 1:2 ratio. Good human scale in the street is achieved with a width ratio of 1-1.5:1 according to the CSPF.
- Street widths are generally narrow and less than 20m width on average which creates a poor street experience with narrow and canyon like environments throughout the SSP area.

45m street wall height to banks street

✓

- Street wall heights to commercial podiums are aligned to Wattle Street warehouse building heights and allocated to commercial uses

Strengthen the existing condition of a similar maximum RL in height for small buildings on the ridge and taller buildings on the edge as a result of the changing topography.

-

- no analysis is provided of the streetscapes within the precinct or along streets to the precinct

All podium setbacks above the identified street wall heights would be consistent with Central Sydney controls of 6-10m based upon wind conditions at street level.

✗

- Setbacks are generally less than the central sydney standards contributing to streets which have a high degree of enclosure as well as limited sun access.

HEIGHT REVIEW

Integration with Context

The Pymont Peninsula Place Strategy identifies a diverse mix of interfaces between the Blackwattle Bay SSP and adjacent areas including:

- modern high rise apartment towers as part of recent master plan renewals at Jacksons Landing
- modern low and medium rise apartments to the south on Pymont Bridge Road
- low scale heritage terraces to the east between Banks Street and Harris Street

In addition to the immediate interfaces, the SSP will be highly visible from most locations within the peninsula which will change the setting and experience of places further away.

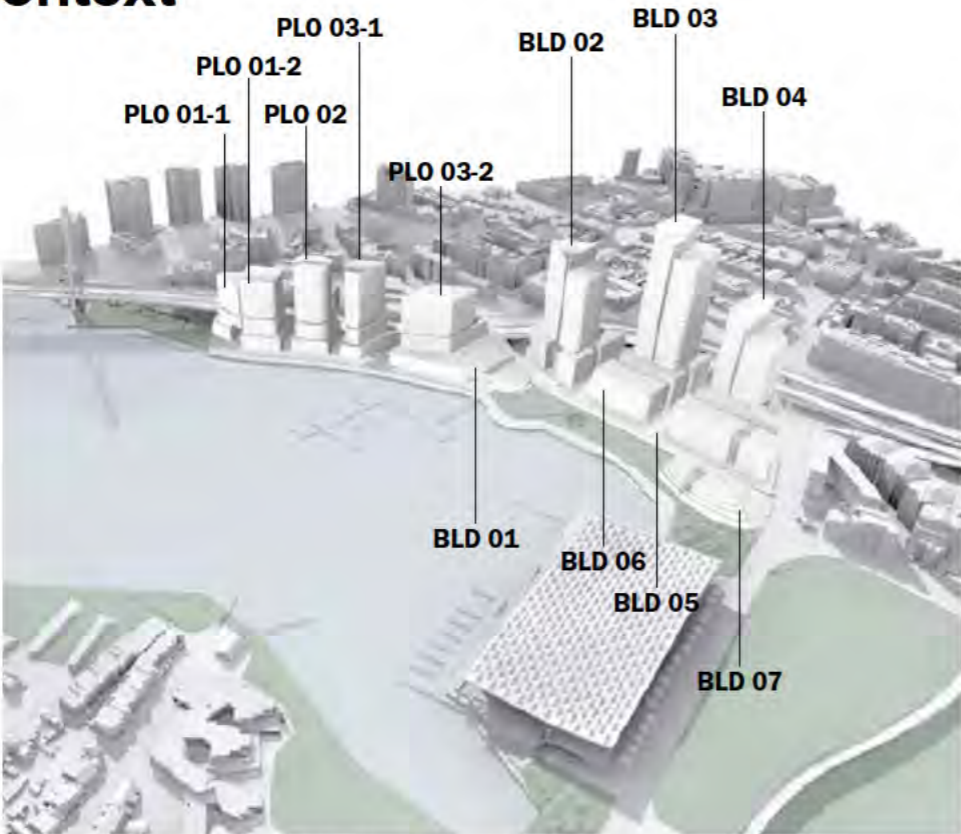


Figure 1.2.44 / 3d View of BWB SSP Master Plan proposal (INSW)



Figure 1.2.45 / Detail of Black Wattle Bay Sub-Precinct Structure Plan under the PPPS (HASSELL)

Summary of BWB SSP Proposal:

→ The BWB SSP provides no documentation that shows the relationship between the proposed master plan envelopes and adjacent existing buildings.

PPPS Objective

Development that complements or enhances the area - New or upgraded buildings fit with the Peninsula's evolving character

BWB Alignment

X

Comment

→ The submitted documentation in the Urban Design Report and accompanying documentation does not show the relationship between the proposed built form and adjacent areas. Based upon submitted aerial renders a positive outcome is not currently demonstrated.

- ✓ Proposal is aligned with PPPS objectives
- Proposal could be aligned with PPPS subject to minor refinement
- X Proposal is not aligned with PPPS objectives

HEIGHT REVIEW

Design Excellence

The PPPS recognises the City of Sydney and GANSW's existing policies for design excellence being relevant for guiding the implementation of future development within the peninsula.

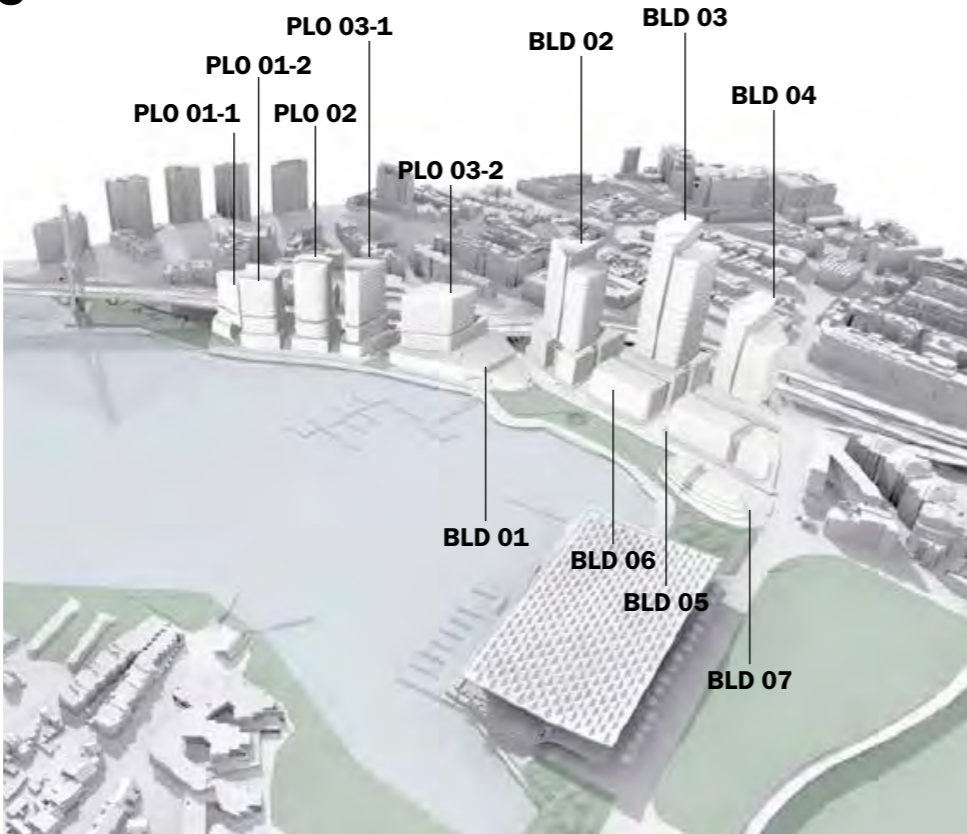


Figure 1.2.46 / 3d View of BWB SSP Master Plan proposal (INSW)

Summary of BWB SSP Proposal:

→ BWB SSP provides a draft design code which states "all buildings within the precinct are to be the subject of a competitive design process in accordance with the applicable guidelines of the Government Architect NSW or the City of Sydney Competitive Design Policy".

→ BWB SSP provides a draft design code which states "a design excellence strategy for the public domain must be prepared to inform the preparation of the Public Domain Plan. The design excellence strategy is to be prepared in consultation with the NSW Government Architect".

PPPS Objective	BWB Alignment	Comment
GANSW or City of Sydney Guidelines will be guide the quality of future development	✓	→ The submitted Design Code specifically references the use of either GANSW or City of Sydney Design Excellence strategies.

- ✓ Proposal is aligned with PPPS objectives
- Proposal could be aligned with PPPS subject to minor refinemen
- ✗ Proposal is not aligned with PPPS objectives

HEIGHT REVIEW

Public Benefit

The PPPS has identified a series of future outcomes and infrastructure schedule which has been developed in consultation with the City of Sydney and should be referred to in assessing the adequacy of proposed public benefit

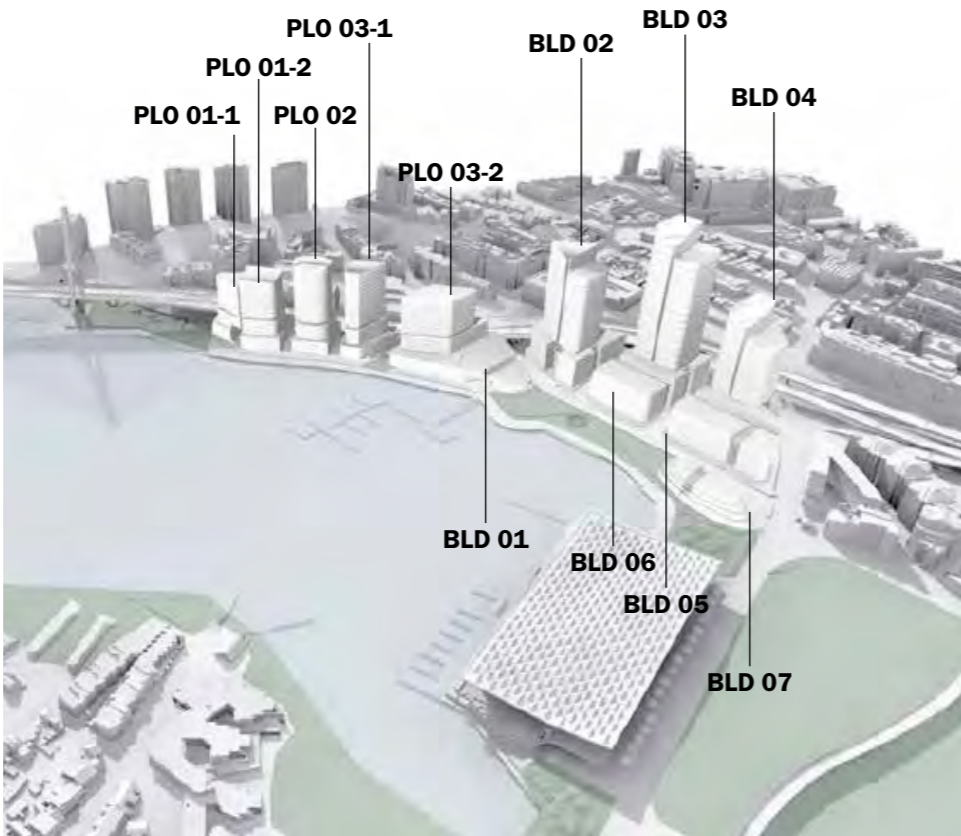


Figure 1.2.47 / 3d View of BWB SSP Master Plan proposal (INSW)



Figure 1.2.48 / Plan of proposed social and community infrastructure under the BWB SSP (FJMT)

Summary of BWB SSP Proposal:

→ The BWB SSP proposes a series of open spaces and potential community facilities under the Urban Design Statement drawing upon findings of the submitted Social and Sustainability Assessment.

PPPS Objective

Refer to separate infrastructure schedule for alignment

BWB Alignment

- ✓ Proposal is aligned with PPPS objectives
- Proposal could be aligned with PPPS subject to minor refinemen
- ✗ Proposal is not aligned with PPPS objectives

Comment

→ Refer to separate infrastructure schedule for alignment

