

26 August 2022

INSW

Dear Sir/Madam

Re: State Significant Precinct Study Blackwattle Bay revisions to the masterplan and proposed planning controls for a final assessment

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

The Glebe Society strongly objected to the initial Blackwattle Bay State Significant Precinct Study. We objected to virtually every detail of the plan: the fact it is (largely) on publicly owned land; the massive overdevelopment of the site; the height of the buildings; the density; the narrowness of the foreshore walk; the percentage of public open space; the future impact of residents and business people on local transport and traffic infrastructure; and the impact on the aquatic environment.

While the revised plan includes welcome reductions in both density and building heights, the changes are manifestly inadequate. The widened foreshore walk is welcomed, but it will still be frequently overshadowed.

It does not have to be this way. On the other side of the Bay, the Bays West Stage 1 Master Plan proposes buildings of four to 20 storeys, with just one at 20 storeys, and most around eight storeys. It will have 4.16 hectares of open space. And it has an enviable Connecting with Country Framework which underpins the entire development, rather than just being an add-on, which is what the current Blackwattle Bay plan has.

The Bays West Stage 1 Draft Master Plan and Urban Design Framework is an incredibly comprehensive document, which records in detail the indigenous and colonial history of the site, as well as the environmental considerations. We in the Glebe Society can only look on in envy and wish the Blackwattle Bay site was studied with such attention to detail.

The reduction in the height of most, but not all, buildings is welcome. The first plan was to have a 45-storey building, one 32 storey, one 30 storey and two 25 storey buildings. The tallest buildings in the new plan, at 35 storeys, are still too high. Note, the tallest building proposed for Bays West Stage 1 is 20 storeys.

The height controls in the current Sydney City Council LEP are well considered and relate to the controls nearby. They provide for a maximum of 33 metres (nine storeys). Most of the proposed buildings exceed this, they are still too tall.

We believe that the Pyrmont peninsula should be planned as an integrated unit. To have very tall buildings in the State Significant precinct on the western edge of the peninsula is contrary to good urban design principles. Buildings of this height are only found in the CBD. There is no justification for having this height on this site.

We note that some buildings would be taller under the revised plan: PLO 1-2, which would be 20 storeys would be 5.9m taller; and PLO 2, 25 storeys would be 8.9 m taller. It should be noted that both of these are on privately held land. Indeed, one of the stranger aspects of the plan is that five of the proposed buildings – PLO 1-1, PLO 1-2, Building PLO 2, Building PLO 3-01 and Building PLO 3-02, which account for over half the planned GFA - are all on privately owned land. In the discussion on configuration in Attachment 3, Urban Design Statement Addendum, it states: “the Private Land Owners were clear when consulted that site consolidation was not supported and would delay renewal on the sites on the northern precinct” (authors’ capitalisation) p. 27. What does this mean? Are the private land owners reluctant, even refusing to sell? What does this mean for future development of the site as a whole?

The figure for the decrease in density in Attachment three varies between 13 and 15 per cent. We welcome the decrease but believe this is still far too high. (Note: there are a number of inconsistencies in figures including heights of buildings in Attachment 3).

The increase in public open space to 55.5% per cent of the site is welcomed, though it should be pointed out this includes roads and laneways.

The increase in the waterfront promenade to 30 metres meets a key demand of The Glebe Society, and our desire to extend the foreshore walk along the Glebe side of Blackwattle Bay. However, the current plan shows the walk to be a shared path (shared by both pedestrians and bicycles). This has been shown not to work on the Glebe foreshore walk. Combining those walking for leisure, walking with children, the elderly and tourists stopping to gaze at the view with cyclists intent on their commute does not work, and indeed poses a risk to pedestrians. There must be separate paths for pedestrians and cyclists.

The Glebe Society welcomes the increase in affordable housing from 5 to 7.5%, however this falls far short of the 25% recommended by the City of Sydney advocates for government owned land.

Many problems remain. For Glebe residents, the proposed development would still overshadow the suburb in the early morning. The buildings would tower over the Bay, destroying its natural amenity, and bring increased traffic pressure to our roads that will also have to cope with unacceptable increases in traffic and parking from the new Sydney Fish Markets.

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

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

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

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

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

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

The choice of trees for the parks must be reconsidered. Some, like *Angophora costata* (not costara) have proven successful on the Glebe foreshore walk. However *Celtis australis* is known locally as the Glebe Weed. It is a highly invasive species, listed as a weed by the NSW Department of Primary Industries. It should never be planted in the inner city.

Both *Koelreutaria paniculata* and *Populus simonii* are non-native trees.

How about honouring the commitment to the area's indigenous history and planting a grove of Tjerruing or blackwattle trees (*Callicoma serratifolia*)? It would be wonderful to see the plants growing in the place named for them again.

The Society cannot understand why INSW have not adopted the recommendations in the Council of Sydney's design review. It provides a similar yield but reconfigured with fewer and lower towers and a revised street layout and building envelope which results in greatly improved amenity.

We agree with the city that it is essential that the plans include:

- a new promontory park which has a minimum four hours of continuous sunlight in mid-winter to most of its area for grass to grow and people to sit in sunshine
- a foreshore promenade north of the park, with a minimum two hours of continuous sunlight at the equinox to support a continuous row of trees for summer shade, this is best provided with a wider, on land promenade

- a revised Miller Street intersection that provides safe and direct entry for people walking, even if Hymix and its concrete trucks remain, and a new intersection on Bank Street for vehicles connecting to the existing fish market site
- planning envelopes that protect future residents from the air and noise pollution of the Western Distributor and Hymix facility
- planning envelopes that minimise overshadowing of existing neighbouring residential apartments
- a quantum and arrangement of commercial uses on site that will attract and sustain commercial tenants
- planning controls that will deliver affordable rental housing on government owned land within the precinct
- a revised street layout with fewer, wider streets to enable a new connection to Bank Street, clear separation of commercial and residential buildings, and better arrangements for servicing and car parking, and
- more certain controls for less carbon intensive, and sustainable buildings.

We would prefer to see less dense development and greater opening of vistas to the harbour from the Pyrmont peninsula through the western distributor, however Council's scheme should be adopted as a minimum.

Yours sincerely

A handwritten signature in black ink that reads "Ian Stephenson". The signature is written in a cursive style and is positioned above a horizontal line.

Ian Stephenson  
President