

22 August, 2022

## Submission to NSW Department of Planning and Environment – Blackwattle Bay State Significant Project Response to Submissions

We have studied the documentation exhibited as Infrastructure NSW's Response to the unprecedented number of submissions on the draft Blackwattle Bay SS Precinct Study (numbering in excess of 2,400), the majority of which objected to the height, scale and placement of the proposed development, and lack of adequate public space along the foreshore walkway. These revised plans do not address the concerns expressed in submissions and we therefore reject them on the following grounds:

- 1.0 Scale – Whilst the maximum height of some buildings on the current Fish Markets site has been reduced to 35 storeys, the height of one building on a privately owned site in Bank Street has actually been increased thus overshadowing the residential apartments behind the commercial buildings fronting Saunders Street. The City of Sydney's revised plans further reduced the maximum heights of buildings on the publicly owned Fish Markets site but still presented as a wall of buildings totally out of scale with the adjacent developments including the row of heritage terraces in Bulwara Road, commercial buildings in Pyrmont Bridge Road, and residential and commercial buildings in Wattle Crescent, not to mention the new Sydney Fish Markets (SFM). Thus the proposed redevelopment does not meet Direction 2 of the Pyrmont Peninsula Place Strategy (PPPS).
- 2.0 Building Envelopes – Once again, we are presented with what has become the hackneyed tower on podium building envelopes. This has now become the standard rolled out across the CBD, and particularly around the edges of the Western Sydney waterfront, including at Barangaroo (the phallic Crown casino complex) and now the development proposed to the North on land set aside for foreshore parkland; and the recently approved Cockle Bay redevelopment, plus the Sofitel Hotel and the proposed Harbourside redevelopment at Darling Harbour. This building form walls off the harbour from many vantage points behind, and also denies views to significant buildings, including heritage buildings from the water and other harbourside precincts to the North and West.
- 3.0 Public Amenity – In addition to the visual impact of the proposed wall of buildings, the buildings themselves do not meet the standards of liveability for those occupying them. The Australian Institute of Architects has identified the proposed residential towers as unsuitable as residents will be exposed to dangerous vehicle emissions and noise from the Western Distributor, requiring windows to be kept closed. The Response also completely ignores the submission from Hymix which indicates its intention to keep



operating its concrete batching plant in Bank Street. This facility generates very loud noise and dust and is approved to operate 24/7.

- 4.0 Land Use – Prior to finalizing its initial draft Blackwattle Bay Precinct Strategy (BBPS), INSW sought public views on the preferred balance between Commercial and Residential space to be provided. Respondents had the choice of: Majority of space to be Commercial; majority of space to be residential; or an equal mix of Commercial and Residential space. Respondents overwhelmingly supported an equal balance between Commercial and Residential use. The RtS completely ignores this strong preference and proposes a significant reduction in Residential space, with the precinct now proposed to be overwhelmingly Commercial (840 fewer residents from the draft plans exhibited). We understand this mix is supported by the City of Sydney but it is rejected by Pyrmont Action members on the basis that all indications are that the trend to working from home will be permanent, resulting in empty office space throughout the CBD and nearby suburbs. The mix between residential and commercial usage in the first redevelopment of the Pyrmont Peninsula achieved a good balance and this should be perpetuated in Blackwattle Bay. There is also no mention of provision of Public/Affordable Housing in this revised strategy, even though there is a growing demand for such provision.

We note that the Indigenous Cultural Centre proposed in the draft BBPS has been removed. Attachments 27 and 28 provided excellent and detailed information and recommendations associated with the significance of Blackwattle (Tjerruing) Bay to First Nations people from around the Western and Northern Harbour lands and there must be a firm commitment to the establishment of such a centre developed in concert with appropriate First Nations representatives. Such a centre is now even more needed, with the government's decision to abandon plans for a First Nations museum in the Cutaway at Barangaroo.

- 5.0 Public Domain – We do not accept INSW's response to the criticism of the totally inadequate provision of open space along the foreshore, ie to build a boardwalk over Blackwattle Bay. This just enables more high-rise development close to the foreshore and covers more areas of the bay, already impacted by the new Sydney Fish Markets development. The same device has been used extensively in Darling Harbour the waters of which will be reduced significantly in area once the Cockle Bay and Harbourside redevelopments are constructed.

No additional public open space provision has been made in the RtS, with the 30% allocation remaining unchanged. Pyrmont remains poorly provided with usable green open spaces, noting the tendency of Governments to double count Wentworth Park in its open space allocations for both Glebe and Pyrmont. Accessible open space, especially in densely populated areas is essential for the health and well-being of residents, visitors and workers, as shown in the popularity of the local parks during Covid-19 lockdowns.

The proposed park off Bank Street has the potential to meet some of the open space and recreational needs of the Pyrmont community and other current users of the site. We reiterate our approval of the proposed removal of the temporary commercial



Blackwattle Bay Marina buildings, and our desire to be involved in the early planning for what we propose should be called Tjerruing Park. Other stakeholders which should be involved in early consultation are representatives of dragon boat clubs, the Pyrmont Heritage Boating Club, Pyrmont Ultimo Landcare, First Nations representatives and representatives from nearby residential stratas overlooking the site. We strongly support the redevelopment of the 1-3 Bank Street site as a community facility housing; an office for the public marina; toilet and changing room facilities for dragon boaters; space for artists' studios/exhibition space; café/bar.

It should be noted that the proposed redevelopment of the former City of Sydney depot site in nearby Fig/Wattle Streets is required to include an 80-place childcare centre and two informal tennis courts, duplication of which may not be necessary in the Blackwattle Bay redevelopment.

- 5.0 Access – Of particular concern is the lack of adequate public transport access to Blackwattle Bay. Currently, the Dulwich Hill light rail service is the only easily accessible public transport serving the precinct, although the notoriously unreliable 501 bus service between West Ryde and Central Station has a stop near the corner of Miller and Harris Streets. Pyrmont Action members have been advocating for provision of a new bus service which would travel from Pyrmont to Central, Broadway Shopping Centre, University of Sydney, RPAH (Missenden Rd), returning via Bridge Road with stops in Glebe, the new Sydney Fish Markets, Blackwattle Bay/Bank Street/Bowman Street. It should be noted that the proposed West Metro station in Pyrmont is some distance from the Blackwattle Bay/SFM and will take passengers to a new CBD station at the corner of George and Hunter Streets. There is currently no public transport providing direct access to the centre of the CBD, noting that the new George Street LR has stops at Town Hall and QVB with no stop north until Wynyard.

The new SFM has an inadequate provision of carparking spaces, instead promoting active transport which is unrealistic if buying any quantity of seafood which would need to be carried a considerable distance to the nearest convenient public transport. We continue to emphasise the need for a pedestrian tunnel linking the Western Pyrmont Metro station entry with Blackwattle Bay/new SFM precinct, thus avoiding long waits at many traffic lights, so far without success.

We also strongly urge the introduction of a ferry service between Barangaroo and Blackwattle Bay/new SFM, with a stop at the existing wharf at Pirrama Park.

I have tried to access our original submission on the draft BBSSPS via the Planning Portal (as I have recently lost all data on my old computer – now replaced) to attach to this submission without success. This outlines in more detail our recommendations for this important precinct most of which, to our dismay, have been ignored in INSW's RtS which merely tweaks some of the more egregious elements of the Strategy. This submission should be read in conjunction with our earlier submission on the draft. We ask that the Department of Planning reject this latest version and recommend that the proponent commence genuine engagement with all those whose sincere and genuine concerns have been ignored.

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