

24 June 2022

Director
Portfolio Management and Strategic Projects
Department of Planning and Environment
4 Parramatta Square
12 Darcy Street
Parramatta NSW 2150

Via email [REDACTED]

RE: Bays West Stage 1 Master Plan Public Exhibition

Inner West Council appreciates the opportunity to comment on the exhibited draft Bays West – Stage 1 Master Plan for White Bay Power Station (and Metro) and Robert Street Sub-Precincts.

Please consider this letter and Attachment 1 as the Inner West Council submission. Attachment 1 is structured as follows and outlines areas of support, concern or where we do not support proposals:

- Section 1 – Inner West Council Priorities
- Section 2 – Key Elements as outlined in the Summary Stage 1 Master Plan and Urban Design Framework
- Section 3 – Other matters relevant to Stage 1 and not directly covered by the above.

As an overarching comment Council is of the view that the adopted *Bays West Place Strategy (2021)* is ambitious in its aims. While those ambitions were supported it was anticipated the next phase being the Stage 1 – draft Master Plan would demonstrate how those aspirations would be realised, including just to name a few:

- providing the required evidence – feasibility, detailed modelling, economic viability
- detailed design on essentials – the adjoining road network or habitat needs
- committing to identified needs analysis – indoor recreation facility among others
- commitment to an implementation plan – that would give certainty when key elements of the public domain, including the foreshore walk would be delivered
- firming up targets – affordable housing, sustainability (beyond tree canopy) or other mechanisms needed to realise proposals for example ‘carbon neutral’, and
- explaining the delivery vehicle intended to provide oversight, monitoring and review.

In addition to the above, given the exhibited documents failed to commit to an affordable housing target, Council does not support the master plan in its current form.

On this basis Council looks forward to reviewing the next phase in the planning process, the Rezoning Package and considers it essential that this package moves beyond land use zones and development standards to incorporate the level of information necessary to demonstrate realisation of Bays West intended outcomes.

Inner West Council aims to provide constructive comments and again we thank you for the opportunity to respond to the exhibition material. If you require any clarification or wish to discuss any of the matters raised, please contact Jennifer Gavin, Executive Planner on [REDACTED]

Regards



Daniel East

Strategic Planning Manager

Attachment 1: Inner West Council Submission

Inner West Council comments are provided under the following Sections and Topics:

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Topic	Stage 1 Master Plan proposals – summary relevant to IWC comments	Inner West Council Comments
Section 1 – Inner West Council Priorities		
1. World class public transport access	The sub-precinct is supported by the Sydney Metro Bays Station and will include routes via the station and on the adjacent road network – Victoria Road.	<p>Council supports the provision of the Sydney Metro West Bays Station. This will increase accessibility not only for new but existing nearby residents and workers.</p> <p>To support a world class public transport system, Bays West provides an opportunity to integrate digital infrastructure, including but not limited to real time data for public transport to enhance interconnectivity. The inclusion of digital infrastructure is not currently referenced in the draft master plan. The finalised master plan would benefit from establishing a standard of delivery for digital infrastructure aligned to world leading best practise.</p>
2. Re-opening Glebe Island Bridge to pedestrians and cyclists	<p>Subject of a separate sub-precinct being the Glebe Island Silos.</p> <p>Active transport links notes: <i>This could include Glebe Island Bridge subject to further detailed investigations, scoping, business case development investment decisions of NSW Government (Master Plan Summary, page 23).</i></p>	<p>Council acknowledges Glebe Island Bridge is subject to a separate sub-precinct master plan process. It is noted that discussion on active transport include the potential for Glebe Island Bridge to form a link within this network.</p> <p>Council strongly advocates for the NSW Government to re-open this historic bridge for active transport.</p>
3. Public access to the foreshore	The primary waterfront within this sub-precinct is to the northern side of White Bay and the full extent of this foreshore is identified as public open space in the form of White Bay Park and Foreshore Walk.	Council supports the prioritisation of foreshore land for public purposes and open space. We strongly support this approach being continued in future sub-precincts that adjoin the foreshore.

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<p>4. Affordable housing</p>	<p>The exhibited material reiterates the intent to include affordable housing by referencing:</p> <ul style="list-style-type: none"> • The <i>Master Plan Summary – Where are we now</i> (page 10) states <i>Master Planning – identifies affordable housing and sustainability targets</i> • Direction 2 of the Place Strategy relating to housing diversity, including affordable • Affordable housing as an opportunity for the sub-precinct • Noting that resulting draft planning controls would include affordable housing among other matters. 	<p>The <i>Bays West Place Strategy</i> (November 2021) includes an Implementation Plan (page 68). Action 4b of the plan states ‘<i>Master planning for each sub-precinct to facilitate the delivery of an appropriate amount of residential dwellings, ensuring diversity of types and tenure, including affordable housing in line with government policy.</i>’ In addition, the exhibited <i>Stage 1 Master Plan Summary</i> states this phase will identify affordable housing targets. Council’s review of the Stage 1 exhibition material finds no direct reference to housing numbers, only potential gross floor area, and no affordable rental housing targets.</p> <p>It is acknowledged this sub-precinct has an employment, community, cultural and open space focus and that future sub-precincts may provide further housing opportunities. Regardless, housing is identified as a land use, and the lack of detail on affordable rental housing targets is a missed opportunity to establish expected benchmarks across the broader area. This would set a positive precedent for this, and other sub-precincts.</p> <p>It is well established that feasibility impacts on the delivery of affordable housing, and this is largely due to the land value costs. The NSW Government owns the land and has the unique opportunity to demonstrate that affordable rental housing is a key deliverable.</p> <p>Council reiterates it’s expectation that the Bays West, given its location and Government ownership, should exceed Region Plan targets and deliver a minimum of 30% affordable rental housing. In addition, Council’s endorsed Policy requires affordable rental housing stock within the local government area (LGA) to be owned in perpetuity by Council and managed by the not-for-profit Community Housing sector.</p> <p>A copy of Council’s recently adopted <i>Inner West Affordable Housing Policy</i> is available here: Policies – Inner West Council (nsw.gov.au)</p>

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<p>5. New recreation facilities including an indoor sports centre and multiple outdoor sporting grounds</p>	<p>Across the entirety of Bays West, the exhibited <i>draft Social Infrastructure Needs Study (2022)</i> identifies the need for specific recreation facilities, in addition to other social infrastructure, including:</p> <ul style="list-style-type: none"> • Up to two district-level indoor sports centres • 6.3ha of open space (across the Bays West), with a 2ha park within Stage 1 • Four to six play spaces • Up to two sports fields, excluding those provided in Rozelle Parklands • A minimum of five outdoor courts • Up to two outdoor fitness stations • One skating area. <p>Locations for the recreation facilities within Stage 1 - White Bay Power Station and Robert Street sub-precincts are identified in the <i>draft Master Plan and Urban Design Framework</i> including:</p>	<p>The Council reflected on the submission from Shelter (NSW) and supports its position that 15% be applied to all economic land uses – residential, commercial and retail.</p> <hr/> <p>Council strongly supports the inclusion of a district level park and indoor recreation facility in Stage 1. We also support the well-considered variety of public open spaces and plazas, their inter-connectivity and appropriateness to their setting.</p> <p>Council welcomes the inclusion of an indoor recreation facility in Stage 1 particularly the <i>draft Bays West Social Infrastructure Needs Study</i> recommendation that it is located on the ground floor of a new building in Boiler Room 2 site adjoining the Power Station.</p> <p>Council's <i>draft Inner West Local Infrastructure Contribution Plan</i> (section 7.11 and 7.12 hybrid plan) applies to Bays West. It includes a works schedule item for the delivery a new indoor recreational facility. It is noted that the Bays West Needs Study recommends up to two district-level indoor sports centres. One within Stage 1 and another within Stage 2-3.</p> <p>The <i>Inner West Recreation Needs Study 2021</i> shows demand for a new indoor recreation facility as there are no existing facilities in the northern half of the LGA. New residents and workers in Bay West will increase the demand for this type of facility. Our evidence identifies the indoor recreation facility should include a minimum of 4 new multipurpose courts, as well as space for dance, yoga, gymnastics, and pilates. The estimated floorspace requirements of such a facility is approximately 5,300m². This may exceed the available space on the ground floor of the Boiler Room 2 site.</p> <p>As an alternative, and as noted in the Bays West Needs Study, the provision of two indoor facilities could be met in split site locations. One within Stage 1 and</p>

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	<ul style="list-style-type: none"> • a district park (1.82 ha) that extends from Roberts Street to the foreshore with a play space and outdoor fitness station among other uses, • a range of other public open space/plaza environments including Southern Entry Plaza that provides connection to the future Rozelle Parklands, Power Station Park, Power Station Plaza, West Gardens, Metro Plaza and park, Penstock Plaza along Robert Street and Foreshore Walk along extent of White Bay within the sub-precinct, • skate friendly areas, and • district indoor sports/recreation centre potentially within a new Boiler Room 2 building adjoining the Power Station. • The exhibited <i>draft Bays West Social Infrastructure Needs Study</i> notes: <i>'District indoor sports/recreation centre is recommended to be located within the ground floor of new building in Boiler Room 2 site. However, it should be noted that it</i> 	<p>another in a future sub-precinct. While Rozelle Parklands may have offered an opportunity to co-locate an indoor/outdoor court facility, the design of the park is well advanced, currently being in the detail construction design phase.</p> <p>Council requests a commitment is made on the location of the initial indoor facility within Stage 1 and that delivery of the second facility, as a base requirement, is co-located with outdoor courts in a future sub-precinct within the Bays West.</p> <p>In the interim, Council would welcome collaborating on feasibility studies and establishing funding arrangements, between the NSW Government and developers, to ensure delivery of these facilities. Council recommends the feasibility studies progress as soon as possible allowing it to be verified and included in the draft Rezoning Package as a deliverable.</p> <p>In addition, Council welcomes the range of recreational and sports infrastructure identified in the <i>draft Bays West Social Infrastructure Needs Study</i>. This includes:</p> <ul style="list-style-type: none"> • 6.3ha of open space across Bays West, excluding Rozelle Parklands and including 2ha within Stage 1. Council considers this necessary to maintain existing open space per person benchmarks to 2036 for this area of the Inner West. • provision of a district level cultural play space as part of Stage 1. Council's proximity benchmarking undertaken as part of the <i>Inner West Recreational Needs Study 2021</i> indicates that Bays West is further than 400m walk of a playground. Council supports the inclusion of this facility within the White Bay Park. • need for 1-2 sport fields of 4.5-5ha each across Bay West, and in addition to sports facilities delivered in Rozelle Parklands. • need 0.3 aquatic facilities with existing nearby aquatic facilities in Ultimo, Victoria Park and Leichhardt expected to subsume this demand. The

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	<p><i>can be located anywhere within 400 m of the new Metro Station’ (page 6).</i></p>	<p>Leichhardt Aquatic Centre and Dawn Fraser Baths are within proximity to Bays West. Dawn Fraser Baths were recently upgraded, and Leichhardt Park Aquatic Centre is scheduled in the short-term. While current need may be met, Council will continue to assess demand over the medium and long-term.</p> <p>Council anticipates recreation facilities, open spaces, plazas and streetscapes are on land that is likely, and should, remain in public ownership or under public management. While supported, it is essential that the next stage of planning being the Rezoning Package:</p> <ul style="list-style-type: none"> • embeds these through zoning and/or detailed provisions; and • includes a carefully considered Infrastructure Schedule and Staging Plan that provides certainty and transparency that these public spaces/facilities are costed, including ongoing maintenance, scheduled and will be delivered in a timely manner, either ahead of or alongside development. <p>See further comments under 18. Infrastructure Delivery and Funding of this submission.</p>

Section 2 – Key elements of the draft Summary of the Bays West Stage 1 Master Plan and Urban Design Framework

<p>6. Connecting with Country – ‘Water Country’ – Sweet to Sour to Salt</p>	<p>The draft master plan aligns with the Bays West Place Strategy to ensure the Bays West Connecting with Country Framework is implemented as the precinct evolves. The key principle is to reveal, express and celebrate the natural and cultural narratives and knowledge from custodians to reveal the richness of layers and stories of place. It connects people to the site in</p>	<p>Council supports the concept of ‘Water Country’ as a foundational approach to Connecting to Country in the sub-precincts. The concept is well expressed through features of the draft master plan.</p> <p>Aligned to the Heritage element discussed below, Council concurs with the recommendations of the exhibited <i>draft Heritage Interpretation Strategy (2022)</i>. These reinforce the importance of ensuring heritage, including the expression of Connecting to Country, not only influence structural elements of the masterplan but are carried through to detailed design of all aspects of the sub-precinct.</p>
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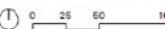
Topic	Stage 1 Master Plan proposals – summary relevant to IWC comments	Inner West Council Comments
	<p>a meaningful way to celebrate Country by informing the design of the urban structure, hardscapes, and built form.</p>	<p>The <i>draft Heritage Interpretation Strategy</i> advocates that implementation ‘be a shared responsibility but that a single body should oversee these activities to ensure interpretation is holistic and coordinated’. This is intrinsically linked to sub-precincts are delivered, and the broader Bays West, in the long term. At this time, it is unclear how this, and other non-built form related outcomes will be implemented. See further comments under 17. Delivery arrangements of this submission.</p> <p>Likewise, Council supports the integrated approach to sustainability and its intent to be guided by Connection with Country. The sub-precinct <i>draft Sustainability Framework</i> includes a range of ways Connecting with Country can be employed across the site and would benefit from being inter-related with items contained in the <i>draft Heritage Interpretation Strategy</i> such as wayfinding and signage using Aboriginal names for places and street and multi-lingual signage.</p>
<p>7. Proposed site layout</p>	<p>The overall vision for the White Bay Power Station (and Metro) and Robert Street sub-precincts is to provide a publicly accessible edge to parts of White Bay, anchored by the White Bay Park and White Bay Power Station.</p>	<p>Council supports:</p> <ul style="list-style-type: none"> • the overarching structure, specifically the public access to the foreshore, the public space offering and celebration of the Power Station. • fine grain access network. See further comments under 11. Traffic and Transport of this submission. • the grouping of built form to ensure retention of key view corridors are retained while noting the Metro over-station development conflicts with key view corridors committed through the Bays West Place Strategy. See further comments under 13. Built form of this submission. • the attention paid to ensuring future inter-connectivity between this sub-precinct with later stages of Bay West. <p>More broadly, Council is concerned that Bays West remains inward looking and disconnected from its surrounds including the centres in Rozelle and Balmain, and their communities. The finalised Master Plan should demonstrate what can</p>

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8. Public domain and open space	<p>The draft master plan aligns with the Bays West Place Strategy (finalised in November 2021) to incorporate public open space including green spaces, playgrounds and access to water within the sub-precincts.</p>	<p>occur outside its boundary to seamlessly interconnect nearby communities to the sub-precinct. This could include the potential scoping or the actual design of those connections by active transport and green infrastructure, in the same way these are anticipated for key road intersections. See further comments under 11. Traffic and Transport of this submission.</p> <p>Council supports more than 50% of the Stage 1 being dedicated as useable public space. As detailed in earlier comments, we welcome seeing this approach continue throughout the Bays West, specifically in relation to public foreshore access and the provision of evidenced infrastructure needs.</p> <p>We would also recommend public toilet facilities be included in White Bay Park.</p>



Figure 6: Public domain master plan (draft Master Plan Summary, page 17)

- | | | |
|--|--|--------------------|
| 1. White Bay Power Station | 5. Power Station Park | 9. Penstock Plaza |
| 2. White Bay Park | 6. White Bay Power Station West Gardens | 10. Foreshore Walk |
| 3. Southern Entry Plaza | 7. Open space adjacent to The Bays station - Metro Plaza | |
| 4. Public open space around White Bay Power Station (includes heritage and shoreline interpretation) | 8. Urban Plaza | |



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<p>9. Heritage</p>	<p>The draft master plan recognises the importance of the White Bay Power Station and seeks to ensure that it becomes a focal point of Bays West. The master plan will facilitate the retention and celebration of the significant heritage fabric of the site and maintain the identified key heritage views from surrounding locations.</p>	<p>Council supports the considered approach to the White Bay Power Station, other heritage listed items and the more subtle aspects such as interpretation methods to highlight the areas rich heritage. This includes its expression of ‘Water Country’, exposure of historic infrastructure, interpretation of rail lines and original foreshore, among others.</p> <p>In relation to Aboriginal Heritage, while there are no known archaeological attributes or artefacts, the <i>draft Heritage Interpretation Strategy</i> includes a quote from Bangawarra, authors of the <i>Bays West Connected to Country Framework</i> (2021), that “<i>It doesn’t matter how much you develop the land, change it or build upon it, Country is still here, and it is still vitally important to Aboriginal peoples and the future of our cultures.</i>” (page 42).</p> <p>The <i>draft Heritage Interpretation Strategy</i> proposes a range of ways the areas rich heritage, Aboriginal and European, can be expressed, as does the <i>draft Sustainability Framework</i>.</p> <p>This heritage of the draft master plan primarily focuses on European heritage and would benefit from bringing together key aspects of <i>Bays West Connected to Country Framework</i>, the <i>draft Sustainability Framework</i> and the <i>draft Heritage Interpretation Strategy</i>, each of which currently sit as separate rather than inter-related studies.</p> <p>In addition, Council advocates that the ‘Water Country’ approach continues through to the Glebe Island Silos sub-precinct to acknowledge the aptly named area was once an island. This could include an interpretation or reinstatement of a water feature connecting White Bay and Rozelle/Johnstons Bays. This would add value to the Connecting to Country story.</p>

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<p>10. Social (and community) infrastructure</p>	<p>There will be opportunities to build new social infrastructure to support residents, visitors and workers as the Bays West precinct grows.</p> <p>The draft Master Plan Summary states the identified social infrastructure:</p> <ul style="list-style-type: none"> • will support the future renewal of the wider precinct and a diverse range of users • will be updated as subsequent Bays West sub-precincts are delivered over time and the final land-use mix and density become known • is based on an indicative land-use mix and density for the wider Bays West precinct, which is subject to change. These include: <ul style="list-style-type: none"> ○ a multi-purpose community and library hub ○ cultural spaces such as maker spaces, local theatre and workshop spaces. 	<p>Council endorses the identified social and community infrastructure outlined in the <i>draft Bays West Social Infrastructure Needs Study (2022)</i>. While supported, we note that these facilities are identified as indicative and may change over time subject to future sub-precinct master planning and that locations are not fixed.</p> <p>It is appreciated Bays West is a long-term project and needs may change however current needs assessment has identified specific items that should be considered as fixed and incorporated early, preferably in Stage 1. This includes the district scale (2,800–3,200m²) community and library hub and cultural space (2000m²), such as maker spaces and flexible event spaces that are flexible multiple-purpose and accessible.</p> <p>Council would welcome collaborating on feasibility studies and establishing funding arrangements, between the NSW Government and developers, to ensure delivery of these facilities.</p> <p>Further, Council supports delivery of identified shortfalls in long day care places, outside school hours care places and health care services in the broader Bays West. It is noted that educational and health care services are a State-level consideration and Department of Planning and Environment (DPE) are facilitating ongoing consultation with the relevant authorities. Council would request to be informed on the consultation outcomes as it will have wider impacts on the local community.</p>
<p>11. Traffic and Transport</p> <p>This topic includes discussion on:</p>	<p><u>General approach</u></p>	<p>Council supports the draft masterplan’s aim to be a 5% ‘ultra-low’ private vehicle environment, and a modal hierarchy that prioritises walking, riding, public transport, freight logistics, port traffic, taxis and pool cars over private cars. This is generally consistent with the modal the <i>Inner West Integrated Transport Strategy</i>.</p>

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<ul style="list-style-type: none"> • General approach • Options – Road network and street hierarchy • Bus routes and facilities • Active transport and cycleways • Key intersections • Port Road duplication, and • Car parking rates 		<p>The final master plan can reinforce this approach by through designs that result in ultra-low speeds and creation of vehicle ‘access paths’ rather than a conventional ‘road network’. Design of the public domain can guide driver behaviour and identify movement routes, in doing so it reduces or eliminates the need for road infrastructure and clutter – signage, kerbs, road lines, bollards and signalised interventions etc.</p>
	<p><u>Options – Road network and street hierarchy</u></p> <p>The staged delivery of the broader Bays West precinct over the coming decades needs to ensure that future connectivity options and opportunities are not discounted at this stage. Given the long-term delivery timescale of the wider Bays West precinct, the draft master plan identifies two options for the road and street hierarchy.</p> <p>The two options proposed provide street networks that support the staged delivery of the initial sub-</p>	<p>Council concurs that that both proposed locations for the primary vehicle route have advantages and disadvantages. Option 1 is preferred by Council as:</p> <ul style="list-style-type: none"> • It would provide a greater sense of place, allowing better connections to the Power Station and facilitating a low-traffic environment in the southern part of the sub-precinct. • It would not result in the active built form areas of the precinct being divided into two, as would be the case in Option 2. • It facilitates co-locating taxi and kiss and ride facilities with the Metro streamlining this interchange. • Motor vehicle traffic between the Metro entry and White Bay Park would bring additional activity and surveillance making the street vibrant and safer at night. • This vibrancy would be in addition to the street’s other positive qualities such as significant foot traffic into and out of the station, its north-east aspect with

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	<p>precincts and will enable adequate traffic and transport connections to the wider precinct and existing local and arterial road network.</p> <p>These options, while similar, represent two different outcomes for the precinct. Both options have inherent strengths and weaknesses, which will be further tested as planning progresses (draft Master Plan Summary, page 24).</p>	<p>park and water views – raising the potential active uses such as for cafes and other retail to establish along this frontage.</p> <ul style="list-style-type: none"> Traffic would not blight the area, provided it is ultra-low speed, bi-directional and there are adequate pedestrian crossings to maintain the physical and perceptual connection from the Metro to the Park. <p>In making these points, the following are noted:</p> <ul style="list-style-type: none"> The primary street would not carry heavy vehicles and other through-traffic related to industrial port activities as these would use the James Craig Road route – giving further confidence that it would be a low volume street. See further comments below under Port Road Duplication. It is appropriate that the current diesel bus fleet do not use this primary street. This may change when the bus fleet is electric, subject to the street’s space constraints.

Option 1: Primary Street in front of the Metro Station



Option 2: Primary Street next to the Anzac Bridge approach



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	<p><u>Bus routes</u></p> <p>An indicative location of future bus routes and stops to service the new metro station has been identified as part of the draft master plan. The final location of bus stops is subject to change and is dependent on the final design of the street network. As the sub-precinct is likely to be delivered in a staged manner, the street network may need temporary bus stop locations to facilitate access for passengers to interchange at the future Bays Station.</p>	<p>Council requests consideration be given to the following future bus and light rail needs that would further support the sub-precinct.</p> <ul style="list-style-type: none"> • The <i>Inner West Council's Traffic and Transport Needs Study</i> supports further investigation of bus links between the Eastern Suburbs and Inner West. It also supports investigation of a loop from the existing Inner West Light Rail connecting North Leichhardt and Pyrmont via the Bays Precinct and Old Glebe Island Bridge. • In Council's 2020 submission on the then draft Urban Design and Landscape Plan for WestConnex Rozelle Interchange, it was requested that consideration be given to a future light rail link from the Inner West line (at the Rozelle Bay stop) to White Bay through the Rozelle Rail Yards sub-precinct. <p>The bus route and layover area within the sub-precinct appears to be a suitable arrangement. Elsewhere in this submission it has been noted that it may be possible in the future for buses to layover on the primary street next to the station entrance when the bus fleet is all electric. Whilst this would be desirable because it would further increase activity along the street and make bus/train interchanges more efficient, it is acknowledged that space constraints on the primary street may prevent this outcome.</p> <p>Bus routes are well established through the area and providing a direct connection via the interchange at the station is supported. The master plan would benefit from input from Transport for NSW to identify which existing, or potentially new, routes would interconnect with the Metro station.</p>
	<p><u>Active transport – walking and cycling</u></p> <p>The delivery of The Bays Metro Station is an opportunity to connect not only the precinct but also the existing community with broader Sydney.</p>	<p>Council supports multiple direct walk/cycle connections within the sub-precinct. These links are necessary to serve the significant increase in active transport movements that will be generated by the Metro and land uses within the the sub-precinct. It will also be necessary to create the desired 'ultra-low' private</p>

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	<p>Enhanced walking and cycling links will enable easier connection within the broader precinct and to neighbouring suburbs.</p> <p>Pedestrian and cycle movement within the sub-precincts will be comprised of a comprehensive pedestrian and bicycle network which includes a mixture of dedicated off-road routes, pedestrian and bicycle priority shareways and supported by end of trip facilities and bicycle parking (draft Master Plan Summary page 23)</p>	<p>car/speed environment and to alleviate traffic congestion at Robert Street intersections.</p> <p>While the cycleways within the sub-precinct are supported, most of the cycleways identified in the <i>draft Transport and Traffic Impact Report</i> (p.19) are external to the sub-precinct and are also identified as gaps in the regional cycleway network – Victoria Road by way of example. In particular, the following routes should be expanded to demonstrate connectivity in the local area:</p> <ul style="list-style-type: none"> • Robert Street / Mullens St - detail design of active transport access is required within the scope of the master plan. This should include removing traffic islands, implementing small kerb radii, installing traffic signals with bike lanterns and providing walking access on all approaches. See further comments below under key intersections. • Underpass pedestrian / cycle connection from the Rozelle parklands / south-west • Victoria Road as a key cycle / pedestrian link into the site from the west. <p>More broadly the arrangement of paths require clarification considering level changes and the various underpasses and flyovers.</p> <p>Elevated connections between Victoria Road and White Bay Power Station should be identified. A bridge currently exists providing level and direct access to the Power Station, this should be retained and depicted on all plans.</p> <p>The draft master plan shows most cycleways within the sub-precinct as dedicated, other than on Anzac Bridge Road where a shared pedestrian/bike lane is proposed. This road will form a key link between the Rozelle Parklands and Glebe Island Silos sub-precincts, the latter including Glebe Island Bridge. It should therefore be designed as a dedicated, rather than shared, cycleway.</p>

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		<p>Appropriate bicycle parking and end-of-trip facilities should be included in the parking plan for the sub-precinct. Of particular importance is the need for weather-protected bicycle parking at the Metro station.</p> <p>A wayfinding plan for the sub-precinct should identify and plan for provision of signage and information associated with walking and cycling routes.</p> <p>Regarding Part 4.8 of the draft master plan – <i>Public Space Typologies and Metrics</i> – the following are recommended:</p> <ul style="list-style-type: none"> • <i>PUBLIC DOMAIN TYPE 4 Public Open Space Footpaths</i> – footpaths should be at least 5m wide and should not be designated as shared paths with cycling • <i>PUBLIC DOMAIN TYPE 5 Public Shared Zone</i> – Shared Zones need to be part of well-designed low-speed streets with no kerbs, no asphalt surfacing, on-road planting, small kerb radii at intersections and ramp gradients between 1:2 and 1:4 on all raised crossings/thresholds • <i>PUBLIC DOMAIN TYPE 6 Public Vehicle Zone</i> – these need to be low-speed, with small kerb radii at intersections and ramp gradients between 1:2 and 1:4 on all raised crossings/thresholds • <i>PUBLIC DOMAIN TYPE 7 Active Transport</i> – physically separated bicycle lanes should be consistent with the <i>NSW Cycleway Design Toolbox</i>, including 3m uni-directional paths achieved by reducing traffic lane widths, reducing the number of traffic lanes, deleting turning/slip lanes and reducing car parking.
	<p><u>Key intersections</u></p> <ol style="list-style-type: none"> 1. Victoria Road and Robert Street 2. Robert and Mullens Streets 3. Robert Street intersection into the sub-precinct 	<p>Note: Intersection comments made by Council in its April 2022 submission on the Stage 3 EIS for the Sydney Metro West Station are shown in Appendix 1.</p> <p>Consultation with Transport for NSW (TfNSW) and Sydney Metro is required to ensure the design and delivery of these intersections are captured in the final master plan and be implemented.</p> <ol style="list-style-type: none"> 1. Victoria Road and Robert Street

Topic	Stage 1 Master Plan proposals – summary relevant to IWC comments	Inner West Council Comments
		<p>Modelling results within the <i>draft Traffic and Transport Impact Report</i> for this intersection show it is currently congested and will continue to be congested into the future. This is to be expected, but the modelling should include any future reductions in traffic along Victoria Road as a result of the Iron Cove Link as part of WestConnex. As a result of by-pass, it is Council’s ambition that the reduced traffic will make way for active transport, public transport and public domain improvements to enhance access and amenity along Victoria Road.</p> <p>2. Robert Street and Mullens Street Signalisation of the Robert\Mullens Street intersection should include missing footpaths and improve or widen footpaths along Robert Street. Street lighting also needs upgrading. Posted speed limits should reduce to 40 (or even 30) kph and traffic calming implemented to ensure pedestrians can cross safely. These measures will be essential to cater for increased pedestrian traffic attracted to the Metro station and other parts of the sub-precinct from surrounding areas.</p> <p>3. Robert Street intersection to the sub-precinct While it is accepted that an intersection is needed, Council is concerned that it will become congested along with the other two Robert Street intersections.</p> <p>Congestion at these intersections would be exacerbated not only by the additional general traffic generated by the Metro and new development, but by buses entering the sub-precinct. The short distance between the sub-precinct entry and the Robert/Mullens Street intersection would be another factor that would create congestion issues.</p> <p>Further detailed design and traffic modelling work is required to ensure traffic congestion issues are avoided and the intersections work well for all road users including pedestrians and cyclists.</p>

Topic	Stage 1 Master Plan proposals – summary relevant to IWC comments	Inner West Council Comments
	<p><u>Port Road Duplication</u> The draft Master Plan explores an option where a section of the existing Robert Street (between Buchanan Street and the existing warehouse buildings opposite the Ports land) could be utilised in the future by traffic from the new Bays West sub precinct travelling to the Cruise terminal on cruise days. Utilising Robert Street in this way would avoid duplicating road infrastructure and could reduce road network complexity and built form outcomes, particularly for the Robert Street Sub-precinct. It is acknowledged that any change would require further detailed investigation, traffic studies, community consultation and modification to the existing Conditions of Consent for the White Bay Cruise Terminal (draft Master Plan Summary, page 24).</p>	<p>Businesses on Robert Street have very little onsite parking, so retention of kerbside parking should be maintained as far as is possible to ensure these businesses remain viable into the future. Parked cars can also be used as a form of traffic calming and as a buffer for pedestrians.</p> <hr/> <p>As is discussed on p.24 of the <i>draft Master Plan Summary</i>, it is acknowledged there would be some advantages to enabling Robert Street to become the sole access road to the cruise terminal. It would negate the need to duplicate the road, which would reduce road space and barriers to active transport access from surrounding areas to the foreshore and into the sub-precinct.</p> <p>Regardless, Council remains concerned about congestion at the Victoria Road and Robert Street intersection, along with the Robert and Mullens Street intersection on cruise days. It is for this reason that access to the cruise terminal via Robert Street is not supported and it is necessary to maintain the two roads, as required by the cruise terminal’s existing conditions of approval. In this way, vehicle access to/from the cruise terminal would continue to be via James Craig Road (not Robert Street) where some spare road/intersection capacity is available.</p> <p>A disadvantage of maintaining this existing arrangement is that the cruise day terminal would add through-traffic to the White Bay Power Station and Robert Street sub-precincts. As outlined in <i>draft Master Plan Summary</i>, this issue requires further detailed traffic analysis.</p>

Topic	Stage 1 Master Plan proposals – summary relevant to IWC comments	Inner West Council Comments
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Figure 149 – Street Hierarchy and Pedestrian Connectivity (draft Master plan and urban design framework, page 95)

Car parking rates

The draft *Traffic and Transport Report* provides a table of parking requirements. This section also notes parking will include EV capable, car share and accessible, and for residential should be decoupled.

Council strongly supports the intent to deliver an ‘ultra-low’ car environment with a 5% mode share, reduced private parking rates and a focus on active and public transport’ (*draft Master Plan Summary, page 22*). Apart from sustainability considerations, a ‘low car’ approach will be necessary given the site is water-bound with limited access to already congested intersections. The proposed car parking rates will assist in achieving this.

Notwithstanding, Council requests:

- Information that shows there is a correlation between the proposed parking rates and desired mode share.
- Parking rates to be stated as maximums.

Topic	Stage 1 Master Plan proposals – summary relevant to IWC comments	Inner West Council Comments
		<ul style="list-style-type: none"> Inclusion of a high ratio of EV-ready spaces, with the charging infrastructure necessary to support 100% EV spaces for all land uses, rather than just for residential. <p>Delivery of the ambitions of the master plan, not only from a transport perspective, but also sustainability, will rely on these matters being clearly stated and carried through to the draft Rezoning Package. Council would encourage the inclusion of a summary of key targets/standards being included in the finalised plan as an evidence base to support the Rezoning Package.</p> <p>Limited information is provided on cycle storage and worker facilities (showers, change rooms etc.) to support those who participate in active transport or sport/recreation throughout the day. Electric charging facilities for micro mobility vehicles (electric bikes, electric scooters etc.) will also be required, beyond electric cars, buses and trucks.</p>

Table 6: Parking requirement

Land use		Units / GFA (m ²)	Parking rate	Parking requirement
Residential	Studio	67	0 per dwelling	0
	1-bed	134	0.25 per dwelling	33
	2-bed	401	0.5 per dwelling	201
	3+ bed	67	0.5 per dwelling	33
	Visitor	-	1 per 20 dwellings	33
Commercial		72,100	1 per 400m ² GFA	180
Retail		5,000	1 per 90m ² GFA	56
Total				536

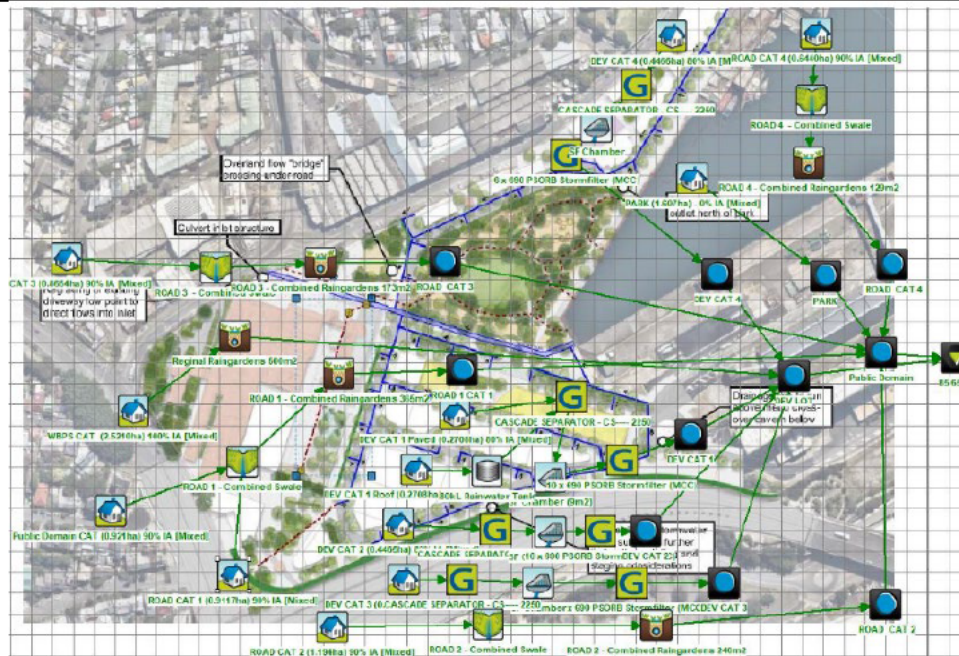
Draft Transport and Traffic Impact Report, page 38

Topic	Stage 1 Master Plan proposals – summary relevant to IWC comments	Inner West Council Comments
<p>12. Sustainability</p>	<p>The renewal of Bays West creates the opportunity to deliver a world-class sustainable precinct that is carbon neutral and delivers efficient management of energy and water, and the elimination of waste. This includes the opportunity to enhance biodiversity on land and water and improve water quality in the harbour while restoring and expanding the green and blue natural systems. Key aspects are framed by an overarching commitment to Connecting to Country and include:</p> <p>Place-based –</p> <ul style="list-style-type: none"> • Climate risk and resilience • Biodiversity and natural systems • Transport and mobility • Water resources and quality • Public health and community wellbeing <p>Embedded –</p> <ul style="list-style-type: none"> • Greenhouse gas emissions and energy • Circular economy, supply chain and materials • Governance and assurance 	<p>Council supports the <i>draft Stage 1 Sustainability Framework</i> objectives and initiatives including applying Green Star and NABERS performance measurement frameworks and targets; and Strategic Direction 7 – deliver a world class sustainable precinct. Council recommends that clear objectives and targets are elevated by bringing these to the front of the Sustainability Framework and Master Plan to reflect the aspiration.</p> <p>While many identified initiatives are considered best practice, there is a lack of analysis in terms of baseline assessment, the evidence base for various initiatives, and prioritisation of actions. It is noted that the sustainability strategy and climate adaption plan (Bays West Implementation Actions) is pending and should inform the final Master Plan.</p> <p>By way of example:</p> <ul style="list-style-type: none"> • Stage 1 is located above a Sydney Water pipeline and culvert draining a total catchment of approximately 55ha. This provides a substantial opportunity to pursue water harvesting and supply water services to the wider Bays West area, similar to Sydney Olympic Park which could include use of parts of the former power station. • The <i>draft Stormwater and Flooding Study</i> includes water quality targets and mechanisms such as bio-swales, rain gardens, tanks etc. We support the inclusion of such mechanisms, and the final master plan would benefit from including the water quality mapping proposed under the MUSIC model and ensuring the identified measures are achievable. Please note the existing Inner West targets cited are under review with the intention of enhancing these. <p>The governance framework for delivering, monitoring and reporting on sustainability initiatives and outcomes is unclear.</p>

Topic	Stage 1 Master Plan proposals – summary relevant to IWC comments	Inner West Council Comments
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The draft Master Plan Summary – *Where are we now* (page 10) states *Master Planning – identifies affordable housing and sustainability targets.*

Council would like to see the above points addressed in the final Master Plan and the draft Rezoning Package supported by delivery mechanisms. See further comments under 17. Delivery mechanism of this submission.



Draft Stormwater and Flooding Study Proposed Water Quality – MUSIC Model, Figure 3-2, page 20

13. Built form

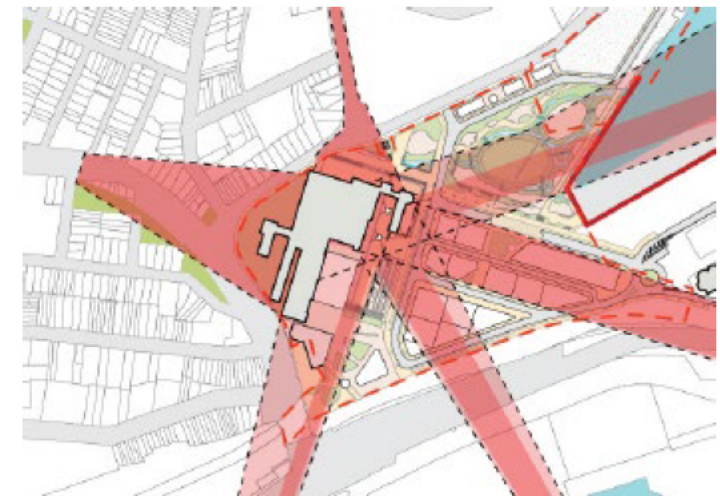
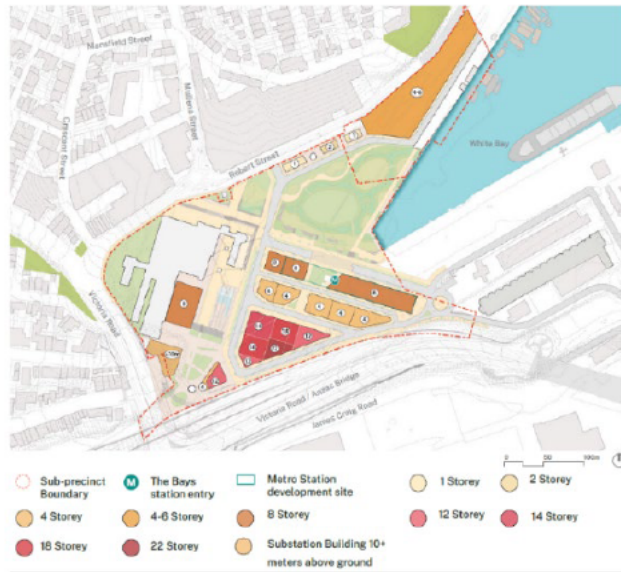
The draft master plan contains urban design principles that have helped to shape the built-form composition strategy, resulting in the proposed Stage 1 building heights.

Built form outcomes will be a key component of the draft Rezoning Package that typically includes provisions and controls relating to resulting development, generally only within the identified development sites. At this time Council comments are limited to the matters outlined in the draft master plan and only for the White Bay Power Station sub-precinct. Content for Robert Street sub-precinct is limited and appears incomplete. See further comments under 16. Robert Street sub-precinct of this submission.

Topic	Stage 1 Master Plan proposals – summary relevant to IWC comments	Inner West Council Comments
	<p>The building heights were informed by a series of known constraints, including the significant heritage view corridors to the White Bay Power Station.</p> <p>Proposed heights are:</p> <ul style="list-style-type: none"> • 8 storeys for the metro station, services and over- station development • 4 storeys for the development immediately south of the metro station • 12 to 22 storeys for the buildings within the southern development precinct • approximately 10 metres above ground level for the substation • 1 to 2 storeys on the northern side of White Bay Park in Robert Street sub-precinct • 4 to 6 storeys for the northern component of the Robert Street sub-precinct. 	<p>Based on the high-level built form information provided, Council:</p> <ul style="list-style-type: none"> • Supports the approach taken to outline proposed building heights across the sub-precinct, specifically the 4 storeys south of the Metro station to retain views of the Power Station from Anzac Bridge. • Does not support the proposed 8 storeys for the Sydney Metro over station building. We reiterate Council comments provided on the Sydney Metro EIS Stage 3 package that – <i>building heights on the Metro Station site will impact on views to and from Anzac Bridge and to the Harbour Bridge. Further, the height of the station building as identified in Chapter 13 of the EIS is likely to exceed the maximum RL as specified in the endorsed Bays West Urban Design Framework (2021) being RL22.2. Chapter 13 of the EIS has assessed these impacts and particularly notes views of White Bay Power Station heritage item will be directly and permanently impacted. Mitigation measures largely rely on heritage design guidance however this is unlikely to overcome the proposed building height and building envelope (albeit limited information has been provided).</i> We recognise Sydney Metro is subject to a separate approval pathway and are concerned to see the draft master plan has reconfirmed building heights for the Metro site as 8 storeys, given this is inconsistent with the endorsed Urban Design Framework. • Supports the proposed active frontages and through site links, specifically through the taller building area that is a single built form block. • Supports ground floor setbacks noting further details are required on street walls, above ground setbacks, articulation etc. <p>While not outlined in the exhibited material, we are aware through DPE presentations, that the Rezoning Package will include detailed design guidelines</p>

Topic	Stage 1 Master Plan proposals – summary relevant to IWC comments	Inner West Council Comments
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and provide a design excellence process. We look forward to reviewing these in the next phase of consultation.



14. Uses and Yields

Given the inherent flexibility in the UDF the following yield scenario represents just one of many permutations of how the Sub-precincts may be realised over time and will be subject to detailed additional testing as part of the rezoning phase of the project. The draft Master Plan states:
The indicative range of yields and uses anticipated within the UDF are a total

Council supports the intent for Stage 1 to have a primarily employment, community, cultural focus and open space focus.

While acknowledging there may be some need for further analysis, Council is concerned that the outlined uses and yields ‘represent just one of many permutations’ (draft Master Plan, page 121).

The draft Master Plan document, and Community and Council Briefings, have consistently quoted a total GFA of 130,000m² and focus on employment, with some 20,000–25,000m² for residential purposes. However, Table 6 Parking Requirements outline a significantly different land use mix (draft Transport and Traffic Impact Report, page 38) being:

Topic	Stage 1 Master Plan proposals – summary relevant to IWC comments	Inner West Council Comments
	<p><i>of approximately 130,000m² Gross Floor Area (GFA) comprised of:</i></p> <ul style="list-style-type: none"> <i>105,000 to 110,000m² Gross Floor Area of commercial, community and retail uses with 15,000m² of the total GFA is located within the existing White Bay Power Station</i> <i>20,000 to 25,000m² Gross Floor Area of residential uses.</i> 	<ul style="list-style-type: none"> Commercial and retail – 77,100m² Residential – 66,900m² (based on 100m² per dwelling as advised by DPE). <p>It is anticipated that subject to minor adjustment the draft Rezoning Package will align with that contained in the draft Masterplan Summary and as advised by DPE, rather than result in a significant shift in land use intent.</p> <p>At this time land uses within the Power Station are very generalised. It is appreciated curating appropriate uses requires significant consideration. It would be beneficial if the draft Rezoning Package could expand on this matter.</p>
15. Housing		<p>As per previous comments – Council seeks clarity of the resulting land use mix and Affordable Rental Housing through evidenced delivery targets.</p>
Other matters		
16. Robert Street Sub-Precinct	<ul style="list-style-type: none"> At this point in time, the Robert Street Sub-precinct is not currently being considered for rezoning but forms part of the Master Plan (page 8) The timing for the rezoning of the Robert St Sub-precinct will be subject to further investigations by Government (page 18) 	<p>The draft master plan aims to include sufficient detail to inform future development controls and supporting infrastructure for the White Bay Power Station and Roberts Street sub-precincts.</p> <p>Based on the content provided, Council is unclear of the boundary and intent for the Robert Street sub-precinct. The sub-precinct boundaries vary between the adopted <i>Bays West Place Strategy</i> (November 2021) and the final <i>Bays West Strategic Place Framework</i> (August 2021). In the former the sub-precinct stretches from Buchanan Street in the north to just north of Mullens Street in the south. While the Strategic Place Framework has the same boundary as the draft Stage 1 master plan.</p> <p>The sub-precinct is within scope for Stage 1, however numerous references are made to rezoning not progressing at the same time as the White Bay Power Station sub-precinct. Given the existing maritime uses and lack of substantive detail Council recommends the sub-precinct be removed from Stage 1, other than the area required to supplement Penstock Plaza and White Bay Park.</p>

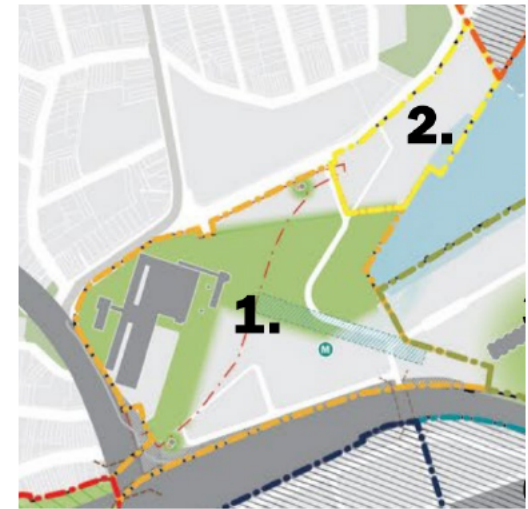
Topic	Stage 1 Master Plan proposals – summary relevant to IWC comments	Inner West Council Comments
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Possibly the White Bay Power Station boundary could be refined to include this area and thereby remove ambiguity of the status of the Robert Street sub-precinct.



Left - Bays Place Strategy – Robert Street sub-precinct, November 2021

Right - Bays West Strategic Place Framework, Final post exhibition, August 2021



Right: draft Stage 1 Master Plan

Topic	Stage 1 Master Plan proposals – summary relevant to IWC comments	Inner West Council Comments
17. Delivery approach	<p>The master plan in Section 3 – Where are we now includes reference to:</p> <ul style="list-style-type: none"> • Stage 4b – Rezoning • Stage 4c – Planning Approval • Stage 4d – Delivery – which includes reference to government led tender processes for development partners (Master Plan Summary, page 10). 	<p>Reference to next stages within the draft Master Plan Summary are brief, underestimating the importance and complexity of these phases.</p> <p>The draft Rezoning Package should provide clarity on the proposed planning approval process. It is anticipated these will follow the State Significant planning pathway and all aspects be subject to design excellence and State Design Review Panel as a minimum.</p> <p>Clarity on the delivery vehicle for the sub-precinct is essential to ensure intended outcomes are achieved. The area is of State importance, is a considerable size, proposes high standards and has very specific needs and ambitions. Importantly, and beneficially it is single ownership, the NSW Government.</p> <p>The <i>draft Master Plan Summary</i> refers to tendering for development partners. This is one approach and if adopted will require transparency on tender expectations to ensure oversight of outcomes are embedded and delivered.</p> <p>Likewise, we note the <i>Bays West Place Strategy Implementation Strategy Action 9</i> states ‘<i>Investigate and identify a lead delivery agency to oversee the renewal of Bays West.</i>’ If this approach is being considered, this should be stated and its legislative powers, role and responsibilities detailed.</p> <p>Numerous models exist and require careful consideration to determine how best to achieve intended outcomes. The draft Rezoning Package should make a commitment to a delivery model and explain it in some detail. It would also be beneficial to outline in some detail the planning approval process.</p>
18. Infrastructure funding and delivery	<p>Section 2.4.8 of the draft Master Plan highlights some key considerations. A range of opportunities and challenges are identified including, among others: Opportunities:</p>	<p>Council acknowledges the efficient and effective delivery of infrastructure for a precinct the scale of Bays West is a complex matter. We also note the Stage 1 draft master plan states ‘<i>Further detail for contributions will be explored at the rezoning stage.</i>’ (page 41) and Action 2c of the <i>Bays West Place Strategy</i> states: <i>The Bays West Supporting Infrastructure Plan will be developed to ensure that</i></p>

Topic	Stage 1 Master Plan proposals – summary relevant to IWC comments	Inner West Council Comments
	<ul style="list-style-type: none"> • Adopt an all-of-government approach to the Sub-precincts, conquering governmental and physical borders to maximise people and place-led outcomes. • Take a co-ordinated Precinct-wide approach to the resolution and delivery of key system/network infrastructure, including major project integration with site resilience and environmental management objectives including flooding, water quality, energy and waste. <p>Challenges</p> <ul style="list-style-type: none"> • Co-ordination of investment and funding mechanisms • Delivery mechanism to ensure proper provision of social infrastructure to support existing and new residents, workers, and visitors. 	<p><i>appropriate critical infrastructure is delivered in a timely manner to support new and existing communities’.</i></p> <p>Given the ambitions and identified needs for Bays West and specifically Stage 1, Council would welcome the establishment of a collaborative Infrastructure Delivery Working Group, including local and State Government. The group could collectively work towards identified opportunities and overcome challenges. This would ensure a realistic and achievable Stage 1 Infrastructure Plan, going beyond a list of items and clearly articulating timing, delivery and funding mechanisms in readiness for exhibition with the Rezoning Package later in 2022. This would also align with Ministerial Direction 1.17 Implementation of the Bays West Strategy, Objective (d) Guide growth and change balanced with character, Indigenous and European heritage, working harbour and infrastructure considerations across the Bays West precinct under the Place Strategy.</p> <p>In the interim, Council has a <i>draft Inner West Local Infrastructure Contribution Plan</i> (section 7.11 and 7.12 hybrid plan) that applies to the Bays West area. The draft plan is scheduled for public exhibition from 6 June to 14 July and we welcome DPE’s comments. Links to relevant documents: Draft Inner West Local Infrastructure Contribution Plan 2022 and supporting studies – Inner West Council (nsw.gov.au).</p>
<p>19. Flooding and stormwater management</p>		<p>The <i>draft Stormwater and Flooding Report</i> identifies risks to the existing White Bay Power Station and proposes diversionary walls and channels to carry water away from the heritage building. This is supported in principle however further detail of the civil design and future ownership details should be provided for Council review.</p>

Topic	Stage 1 Master Plan proposals – summary relevant to IWC comments	Inner West Council Comments
		<p>Regarding flood mitigation across the precinct, it is noted that the Metro Station will include work to upgrade the Sydney Water open channel passing through the site. The precinct redevelopment should build upon and further improve this capacity to provide greater protection to residents in the precinct, buildings, and occupants as well as provide for suitable evacuation routes.</p> <p>To this end, the <i>Leichhardt Floodplain Risk Management Plan (2017)</i> recommends additional pipes through the site and within Robert Street (Option WB-FM1 – see Appendix 2). Any sub-precinct work should include at minimum the construction of the recommended 2100x1800 culvert through the site and the 1500mm diameter pipeline in Robert Street. Any proposed alternative must be of equal capacity or greater to accommodate future upgrade of the upstream network.</p> <p>Consideration of Development Contributions for this area should also include a contribution towards the upstream components of this proposed upgrade to support reduced flood depths in Robert Street and improve evacuation of the sub-precinct.</p> <p>Further consultation with Council’s engineering team and Sydney Water should occur to determine funding and delivery options for drainage infrastructure.</p>
<p>20. Ecology and biodiversity</p>		<p>Council is supportive of Eco-Logical’s approach to nominate recommendations covering stormwater, vegetation, foreshore and waterway, as well as habitat. However, there is no specific indication of the as to the extent which the recommendations and projects will be incorporated into the final master plan. This makes it difficult to comment as to the actual adequacy of these measures as biodiversity improvements in an urban redevelopment precinct of such large scale.</p>

Topic	Stage 1 Master Plan proposals – summary relevant to IWC comments	Inner West Council Comments
		<p>Having regard to biodiversity, the site should not be viewed in isolation and should consider local and regional blue and green connections, including planned and existing connections – for example Council’s Greenway, the community proposal to create a Rozelle “eco-corridor” between Council and Bays precinct land, Council’s natural areas and open space program for the Leichhardt area and Council’s future planning for a Blue-Green grid across the Inner West.</p> <p>The <i>draft Ecology and Biodiversity Report</i> indicates that vulnerable bat species have been detected at the power station, further detail is required in this early stage of planning for bat habitat and protection.</p> <p>It is recommended that the planting strategy for the precinct improve its focus on increasing understorey vegetation and less narrowly on tree canopy. Traditional park environments consisting of lawn and trees (or concrete and trees) with little understorey vegetation favour non-native Common Mynas and native Noisy Miners. Council’s natural areas program focuses on restoring understorey vegetation to address this imbalance which is common in highly developed urban parts of Sydney. This is especially important as there has been a significant loss of weedy small bird habitat in the area due to WestConnex works.</p> <p>The plant communities in the Ecology and Biodiversity report are generally supported but should also include Freshwater Wetlands plant community species in bioretention basins, raingardens and vegetated swales. In addition, local native species of Sydney Basin provenance stock should be incorporated to protect native plantings in nearby Council natural areas.</p> <p>Waterway naturalisation and WSUD principles included in the draft Master Plan are supported. Better biodiversity outcomes and more detailed consideration in</p>

Topic	Stage 1 Master Plan proposals – summary relevant to IWC comments	Inner West Council Comments
		<p data-bbox="992 300 2076 488">this area is needed at the edge of White Bay. This could be achieved by maximising understorey vegetation in the riparian zone – rather than concrete or path treatment along entire length of the water’s edge as shown in the renderings and Figure 9 and Figure 11 in Site Appreciation and Opportunities section.</p> <p data-bbox="992 517 2047 826">Vertical drops at the water’s edge should be avoided and habitat features should be incorporated into sea wall infrastructure. For example, the tapered, naturalised treatments at restored river edge/ sea wall sites such as Carrs Park (whilst not at the same scale) may provide some cues for appropriate habitat and vegetation treatments. Components such as the “Seahorse Hotels” have significant merit but the finalised Master Plan should be more expansive and incorporate broad marine aquatic biodiversity treatments such as the SIMS “Living Seawalls” concept.</p> <p data-bbox="992 855 2040 1043">The Parramatta River Catchment Group has undertaken significant work along the river’s edge, in the areas of WSUD, vegetation, designing with country and active use of the foreshore. This work should be incorporated into the Ecology and Biodiversity strategy for the Bays and into the Master Plan more generally. More information can be found here - https://www.ourlivingriver.com.au/</p>

Appendix 1: Sydney Metro West EIS Stage 3 – Inner West comments on intersections

Proposed signalised intersection of Robert Street and new precinct street

- Parking needs and vehicular access to businesses along Robert Street should be carefully addressed, noting that a range of businesses operate in this area and as they are based on older factory units, where no or very limited on-site parking is available. On-street parking is already very limited and must cater for a wide range of parking needs. It is considered that the impact of reducing parking from 124 spaces to 52 spaces will be detrimental for nearby businesses. Consequently, it is considered that this loss of kerbside parking is unacceptable and must either be significantly improved or compensatory parking provided.
- The proposed traffic signals should include on-street bicycle facilities and pedestrian crossing legs on all approaches.

Intersection of Robert Street and Mullens Street

- There is a need to signalise the intersection of Mullens Street and Robert Street, to accommodate the expected traffic flows. The existing dedicated right turn lane, from Robert Street northbound to Robert Street eastbound, will also need to be lengthened. While carrying out this work the opportunity should be taken to realign and reconfigure the intersection, taking into consideration likely bus, taxi and private vehicles movements from Victoria Road to the Bays Station pickup locations. Additionally, the operation of the White Bay Cruise Terminal will generate movements through and to the end of Robert Street.
- The existing kerb and gutter should be realigned along the south side of Robert Street to provide a continuation of a wider shared path from Victoria Road.
- The signalisation should include pedestrian and cycle crossing legs on all approaches at this intersection.

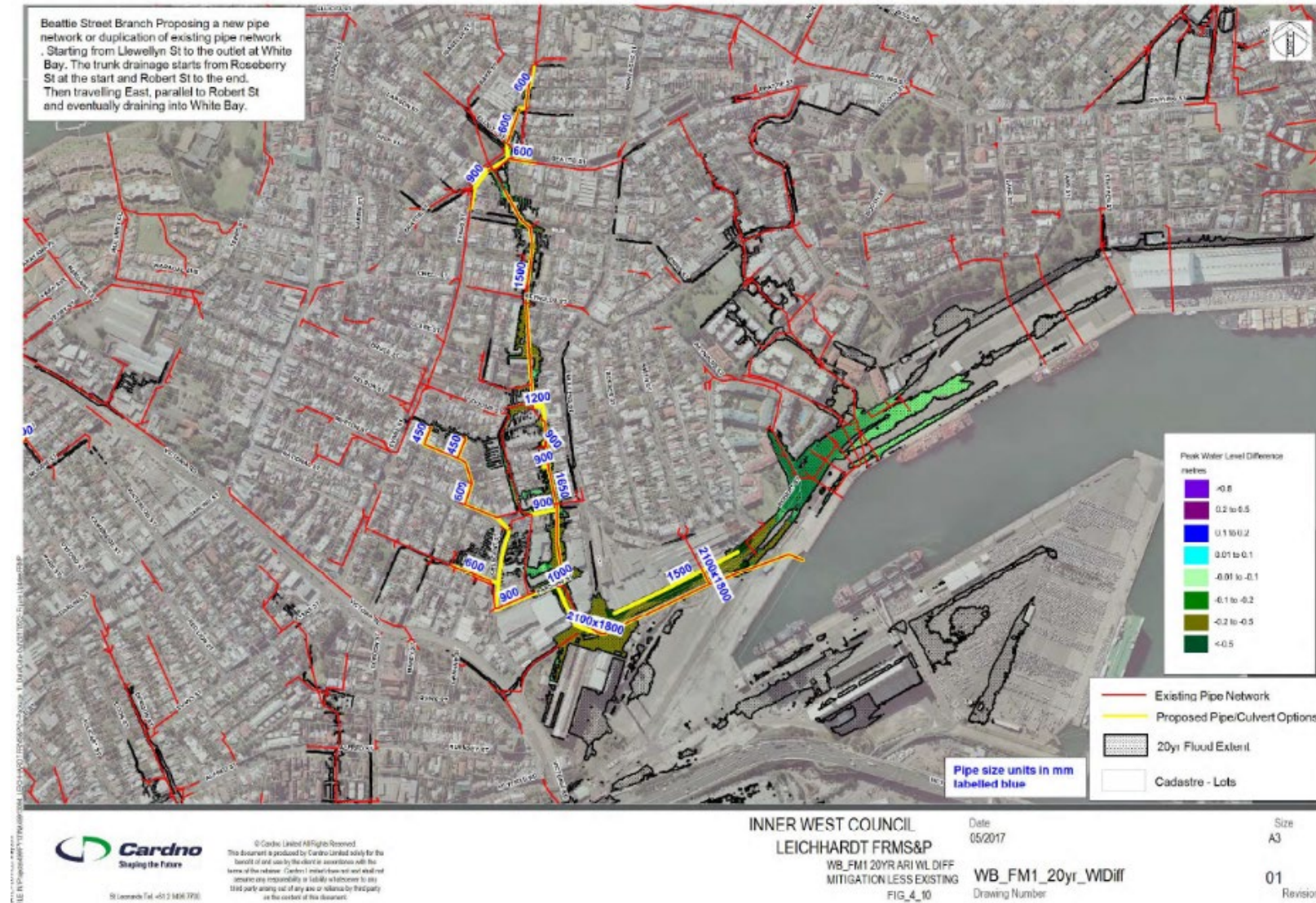
Robert Street

- Currently, there is no footpath along the south side of Robert Street and, in response to the anticipated high pedestrian and cycle volumes, it will be essential to upgrade all existing (and provide new where not existing) footpaths and lighting.
- Smooth connection to existing and future active paths through the Rozelle Railyard Parklands and to Victoria Road is essential.
- Connecting bicycle paths to the east along Buchanan Street is also required as these roads are identified as existing cycle routes.
- The footpath along the north side is currently substandard with angle parking and at times vehicle overhang into the footpath areas. These areas should be reviewed to ensure a balance between walking, vehicle loading and on-street parking for businesses.
- It is also essential to improve substandard road and footpath lighting at night.
- In response to the anticipated high levels of pedestrian and cycle activity, mixing with public and private transport, consideration should be given to reducing the speed limit on Robert Street 40 km/hr or even 30 km/hr.

Intersection of Robert Street and Victoria Road

- The current shared path width along the White Bay Power Station frontage creates a bottleneck for bicycle riders from Anzac Bridge and Council express the safety concerns regarding the 90m of exposed section east of Robert Street where there is no separation between riders and four oncoming lanes of traffic in Victoria Road. It is requested that the shared path be widened, or ideally, as separated cycleway be constructed.
- The continued poor intersection level of service for Robert Street at Victoria Road traffic signals is a concern for Balmain Peninsula residents experiencing delays entering and exiting Victoria Road during the AM and PM peak hours. The part-time operation of the right turn phase from Robert Street to Victoria Road should be re-examined as part of the traffic signal upgrade, and any opportunities to improve intersection performance should be considered.
- With the anticipated increase in pedestrian end cycle use to the station it is considered essential that a bicycle lantern be provided across Robert Street and that the existing, sub-standard, pedestrian crossing leg be repositioned further away from the Victoria Road carriageway.

Appendix 2 – Stormwater and flood infrastructure requirements within and upstream of the sub-precinct



Mr Grant Knoetze
Executive Director
Program Delivery
Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

Dear Mr Knoetze

I write in response to a call for submissions relating to the Bays West Stage 1 Draft Master Plan and Urban Design Framework. The Sydney Local Health District welcomes the opportunity to provide comments on the Master Plan and Urban Design Framework. While generally supporting the development, it is considered that further information is required on the broader Bays West proposals, especially to determine the cumulative impacts of the development on the population's health and wellbeing.

The following outlines some of the specific concerns of the District in respect of the potential health impacts of this development.

1. Social and affordable housing

- It is noted that the proposal does not define a proportion of social and affordable housing within the redevelopment. The District recommends that 15% be considered for affordable housing, as per the Inner West Council policies and that a significant social housing component be considered for this publicly owned site.
- For the Sydney Local Health District, a major employer in this area, access to locally available affordable housing is a critical recruitment issue. Enabling our employees to live closer to work would be of huge benefit to the District.
- Ensuring the provision of affordable housing would also support the aspirations associated with the Tech Central Innovation Precinct, which has identified the lack of affordable housing, having talent and a pipeline of talent for technology related jobs and industries as a key issue. Increased affordable housing close to a Metro station would be very beneficial to the Innovation Precinct.
- The District frequently notes that access to housing, both social and affordable housing, particularly for our most vulnerable communities is critical to mental and social health.

2. Car Parking

- The District is supportive of a low parking environment with reduced residential parking rates and recommends that these could potentially be even lower than is currently proposed. Only 62% of households in the adjacent suburb of Pyrmont (which has no heavy rail station) reported owning a motor vehicle in the 2016 Census, indicating strong and growing market demand for dwellings without parking. The addition of parking can add up to \$100,000 to the cost of new dwellings and promoting car-free developments will reduce the growth in traffic and congestion which generally accompanies these large developments.

- Parking space could potentially be more efficiently utilised (e.g., a space could be used by a visitor/visiting trade during the day and by a resident overnight, rather than being empty much of the time). Unbundling parking spaces from units may also make it easier to repurpose parking space in future with the expected decline in private vehicle ownership. We note recommendation 7.1 of the NSW Productivity Commission White Paper 2021: "Review apartment design regulations to ensure benefits justify costs and accommodate consumer choice".
- In addition to improving housing and transport affordability, an ultra-low parking environment will not increase identified traffic constraints further within the precinct and will not add to any of the associated health impacts (traffic noise, road trauma, and ambient air pollution).

3. Density and height of the proposed redevelopment

- The Bays West draft Master Plan proposes a particularly dense residential area (12-22 storeys) adjacent to the White Bay Power Plant, representing a major density change in this area.
- The proposed residences that face south will be especially impacted by pollution and noise and should be oriented north where applicable.
- The District recommends a reduction in height of the three largest towers, due to concerns for potential wind tunnels, noise and shadowing that may minimise sunlight on the streetscapes below.

4. Access to health care, social care and community infrastructure

- The proposal does not clearly identify the number of people proposed to be living within the 250 dwellings in this area of the Bays West Precinct.
- The people living within the precinct will require access to public and primary health care, including GPs.
- Community facilities will need to be considered for the site, including meeting rooms and spaces that health services could utilise on a sessional basis.

5. Movement and place

- The Stage 1 Masterplan does not fully embrace the vision of the Bays West Place Strategy nor the principles of the NSW Government's Movement and Place Framework, with the proposed road/street network prioritising car movements over both people movement and place.
- It is noted that both main road options cut off the Robert Street sub-precinct and the Power Station from the waterfront and the White Bay Park. The homes and food and beverage outlets in the Robert Street sub-precinct would be surrounded by main roads, exposing residents and customers to traffic noise and air pollution. Option 1 would also cut off the Metro station from the waterfront and White Bay Park.
- Consistent with the aspiration to create an ultra-low traffic environment, it is considered that there should be no through-traffic within the Power Station and Robert St sub-precincts. There is existing road access to the White Bay Cruise Terminal via Robert St, and to Glebe Island via James Craig Rd.
- It is noted that there is no modelling of pedestrian and bicycle level of service/delay.
- The existing and proposed signalised intersections and crossings will impose significant delays on people walking and cycling, thereby discouraging healthy,

active mobility and encouraging traffic. Consideration should be given to redesigning intersections as protected roundabouts (i.e., with pedestrian/bicycle priority on all arms). In line with walkability guidelines, mid-block crossings should be located at least every 80 metres, and give priority to pedestrians (e.g. raised wombat crossings, not signalised crossings). This would eliminate delay for pedestrians and bicycles, as well as help to slow and discourage traffic.

- To further improve walking safety and comfort, all side roads should have continuous footpath treatments.
- The Sydney Local Health District supports the proposed 30 km/h speed limit on roads. This will help to limit road trauma and traffic noise generation, as well as improve amenity.

6. Health Impacts

- The draft Master Plan outlines, broad potential health impacts and the potential mitigation measures to limit these impacts. However little detail or certainty is provided regarding these mitigation measures, nor an evaluation of residual impacts after mitigation. It is assumed that such planning and assessment will be undertaken during the more detailed design and planning phase for the project, however this is not confirmed within the draft Master Plan
- It is considered that an environmental impact statement and a Human Health Risk Assessment (HHRA) or equivalent should be included as a part of the EIS be completed and made publically available for comment.

Potentially, the most concerning health impacts could include:

Contaminated Land

- The land in this area is contaminated with known and unknown contaminants due to extensive historical industrial past usages. For the proposed significant development, excavation of the contaminated land will be required, most notably to construct the foundations for significantly sized new towers and buildings.
- Although the draft Master Plan acknowledges that the contaminated land (and by extension, possibly some local water) is an issue, where excavation is necessary, it will be 'managed as it is produced and provides a broad plan to cap that contamination. Details on how the contaminants will be managed during excavation are not provided.
- The District would seek to be advised when more detailed plans for significant excavation of contaminated land are available to provide appropriate comment.

Air and Noise Pollution

- The net effect of exposure to the negative impacts of road traffic and ports (air pollution, noise, injuries) in the area, both within these proposed sub-precincts and at adjacent and surrounding locations is not clear at this stage of the planning.
- It is noted that the volumes of traffic are large and may become increasingly frequent (if WBCT receives more frequent berths as expected). Exposure to

traffic related air pollution has been shown in epidemiological and clinical studies to be associated with a range of cardiovascular and respiratory health outcomes. There is no evidence of a threshold below which exposure to traffic related air pollution are not associated with adverse health effects. The potential health impact of not addressing this issue adequately include increased local and regional air and noise pollution, increased risk of injuries from vehicle collisions with other road users, and decreased amenity and quality of life impacts for residents of the broader area.

- The draft Master Plan indicates that residential dwellings are currently being considered primarily for the southern and south-western faces of the southernmost buildings within the precincts. The buildings would directly face and be above the major road where Victoria Road transitions into Anzac Bridge. This road will carry significant traffic at almost all hours, and consideration should be given to placing residential dwellings further away from the exposure to high levels of air pollution and noise generated by this road, for example on the north and north-east facing aspects of the same group of proposed buildings.
- The District strongly recommends shore to ship power be embedded within the Port prior to construction in Bays West to reduce polluting emissions, noise and vibration in ports by connecting vessels to the port electricity grid and allowing them to shut down the onboard power generation units while at berth. Measures to limit community exposure to noise are important to protect public health given the growing evidence of the health impacts of environmental noise, with the most significant impacts on cardiovascular disease and sleep disturbance.

Construction and development fatigue

- This large project will entail significant and protracted construction, which in turn will impact the local community. The surrounding communities in Rozelle, Balmain and Annandale have already experienced, and continue to experience, significant cumulative impacts from the concurrent and consecutive construction of WestConnex (and associated Rozelle Railyards), the Western Harbour Tunnel, Sydney Metro West, changes to Victoria Road and City West link, various projects on Glebe island, and the long-standing local community issues related to WBCT. The existing population of this area should be considered particularly vulnerable to construction impacts and construction fatigue.
- To mitigate the broader impacts of construction and development fatigue in this area, consideration should be given to impact mitigation measures beyond those that would normally be applied to this project were it occurring in isolation.

Water-Related Issues

- The impact on the site of significant flooding during storms requires further consideration particularly along the Northern frontage of the White Bay Power Station.
- The District supports the water sensitive design plans for this area that will slow and filter storm water runoff including those focussed on establishing an urban wetland, revealing, naturalising and improving the health of original natural waterways, naturalising river verges and stormwater canals, and constructing

water sensitive urban features such as swales, rain gardens, and green roofs and walls.

- It is also recommended that ongoing planning considers strategies to reduce, control and monitor potential mosquito breeding habitats when planning these features due to the potential for mosquito-borne disease, particularly in the setting of climate change.
- The Sydney Local Health District supports the use of recycled water where possible. However, public health risks from using recycled water will need to be managed appropriately, including approval by the appropriate regulatory authority. All recycled water sourced from sewage, greywater, and stormwater is to comply with the Phases 1 and 2 of the Australian Guidelines for Water Recycling: Managing Health and Environmental Risks (2006) as well as Australian Guidelines for Water Recycling. The licensing of proposed water recycling infrastructure (sewage, greywater and stormwater) would need to comply with the requirements of the Independent Pricing and Regulatory Tribunal (IPART) under the Water Industry completion Act 2006.

In summary, the District would support:

- Increased component of affordable housing and the addition of social housing.
- Reducing the height of the largest towers.
- Recognition of the need for healthcare.
- The impact of noise and air pollution from the ports and Victoria Road/Anzac Bridge on residents.
- Development approaches that mitigate traffic congestion.
- The appropriate management of contaminated lands.
- Further comprehensive health impact studies including traffic studies, future ports uses and environmental impacts of the redevelopment on the health of the population.

Thank you once again for the opportunity to provide feedback to the planning for our Bays West community.

Should you require any further information, please contact Dr Pamela Garrett, Director Planning, Sydney Local Health District at either [REDACTED]

Yours sincerely



Dr Teresa Anderson
Chief Executive

Date: 31.8.22



Our ref: DOC22/383236

Mr Grant Knoetze
Executive Director
Portfolio Management and Strategic Projects
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124
Email: grant.knoetze@planning.nsw.gov.au

Dear Mr Knoetze

Bays West Precinct – Stage 1 Master Plan

Thank you for your presentation on 9 May 2022 to the Heritage Council of NSW about the Bays West Precinct – Stage 1 Master Plan. My apologies for the delay in getting back to you after the presentation, however, we wanted to include in this letter our submission to the master plan's public exhibition.

The Heritage Council welcomes the reinvention of Bays West as mixed-use precinct that embraces continued working-harbour activities and port facilities. The Council strongly supports the adaptive reuse of the White Bay Power Station as a focal point and key driver for an activated Bays West precinct.

Future proofing the meaningful inclusion of the Power Station as an integral part of the wider precinct is not limited by its ongoing conservation works. There is an opportunity for the planning and design of its future use to occur concurrently with the current strategic planning for Stage 1 - White Bay Power Station and Metro sub-precinct. An integrated approach will optimise the opportunities for good heritage outcomes. This includes its sympathetic future use and managed change, and the conservation of significant fabric, settings, views and vistas.

The Glebe Island Bridge is an important link in the connection of the precinct to the city. The bridge is a rare and existing opportunity to facilitate active transport from Rozelle directly to Pyrmont and the city beyond. The Council encourages the activation of the swing-bridge and the exploration of innovative share solutions that would allow pedestrian and cycle use of the bridge and reliable access for boats to Rozelle Bay and the Fish Markets.

We are concerned about the potential impact of the higher towers on the setting and landmark values of the White Bay Power Station, in particular the 12 to 22 storey buildings within the southern development precinct. Limiting building heights so that it is visibly below the height of the stacks will better retain the visual prominence of the Power Station. Maintaining clear significant view lines to the Power Station will also reinforce its landmark status.

White Bay Power Station is the only coal based industrial structure, dependent on a waterside location to survive adjacent to Sydney Harbour. Maintaining this unimpeded visual connection

between the Power Station and Sydney Harbour is important. It is also important that the connection to Rozelle is retained as this is where the Power Station's workers lived.

Significant historical archaeological values associated with the Power Station's use are also present within the precinct. The master plan's proposed Penstock Plaza development will involve excavation of large portions of the Beattie Street Stormwater Channel No. 15, the Inlet Canal and the Northern Penstock. Some *in situ* conservation and public interpretation of these features is also described in the master plan. Understanding these values and the location of the archaeology, will provide opportunities to avoid and manage potential impacts to ensure good long-term conservation outcomes for this significant archaeology.

An important outcome for the precinct is the delivery of interpretation of the site through integrated storytelling. Sharing the stories of Country is addressed in the Bays West Connecting with Country Framework. This includes embracing opportunities to value the continually living, breathing and evolving nature of culture and heritage, and through ongoing engagement with D'harawal, Dharug, Eora, Gai-mariagal and Gundungara custodians.

The former and current industrial and port uses of the site are other key historic layers within the precinct. The Council encourages the retention of significant fabric and its interpretation in the precinct to provide a better understanding of the site's historic functions and its high significance to NSW.

The Heritage Council welcomes ongoing engagement with the Department of Planning and Environment on the Bays West Precinct Stage 1 Master Plan to deliver better heritage outcomes for the precinct.

Yours sincerely



The Hon Robyn Parker
A/Chair, Heritage Council of NSW

31/05/2022

7 June 2022

Our Ref: 2022/308819
File No: X031102

Department of Planning and Environment
Bays West draft Place Strategy Submission
Locked Bag 5022, Parramatta NSW 2124

Attention Belinda Morrow at [REDACTED]
CC: David McNamara at [REDACTED]
Adrian Melo at [REDACTED]

Dear Belinda

Bays West Stage 1 Draft Masterplan

The City of Sydney (the City) welcomes the opportunity to make a submission on the Bays West Stage 1 Draft Masterplan.

Whilst the Bays West precinct is not in the City's local government area, it is the largest remaining area of industrial service land in the Eastern City District earmarked for redevelopment and borders our local area.

The site's size, harbour setting, position in the NSW Government's Innovation Corridor and access to a new metro station as part of Sydney Metro West presents a real opportunity to position Bays West as a city shaping project for the people of metropolitan Sydney.

The City provides feedback below on the exhibited documents and highlights the following as key considerations:

- The City generally supports the proposal, particularly the new park and foreshore reserve, conservation and adaptive reuse of the White Bay Power Station, creation of a commercial centre at the Metro station to serve wider precinct development and the economic potential of the Metro line.
- The City supports a low-level crossing from Bays West to Pyrmont to create more convenient and direct active transport connections. The redevelopment of Bays West must directly facilitate the refurbishment, upgrade and adaptation of the historic Glebe Island Bridge swing bridge as an urgent priority. There is a real concern that the ongoing uncertainty and failure to commit to the bridge's refurbishment, upgrade and adaptation amounts to demolition by neglect.
- The City supports the provision of non-residential uses in the precinct and notes that achieving a critical mass of commercial and retail development is vital for the centre's viability.
- The location of any residential floor space, including the need for affordable housing floor space, should be carefully considered to ensure people's health by protecting future residents from noise and air pollution.

- The City asks that the Department facilitate a discussion with School Infrastructure NSW, the City, Inner West Council and the Department on the issue of planned population growth in the area and the need to ensure that public schools are supporting community needs and continue to be appropriately resourced to respond to changes in student population. This is an issue consistently raised by community and requires a transparent response, particularly given the expense of land and access Bays West offers for a new school if required.

Connecting to Country

The City generally supports the Masterplan's initiatives for Connection to Country. Aboriginal and Torres Strait Islander consultation should guide the development of the Bays West to achieve tangible outcomes beyond place naming and public art projects. We note that reopening Glebe Island Bridge for active transport would provide an opportunity for the Bays West Precinct to link with the City's Eora Journey and Harbour Walk Project.

The City requests that specific provision be made for accommodating Aboriginal and Torres Strait Islander enterprises within the cultural spaces located in the precinct. Dedicating maker spaces, theatre and workshop spaces for these communities will be an empowering move that will ensure the precinct's strategy for Connecting to Country is expressed in all aspects of the development.

Public Domain and Open Spaces

Providing a network of public open spaces and streets with high levels of amenity will be key in supporting the large numbers of future workers, visitors and residents expected in the precinct.

The City supports the delivery of over half of the site area as public open space, including the provision of the 1.8-hectare White Bay Park and connected foreshore reserve areas. This move is key to the precinct's role in contributing to a world class foreshore walk in Sydney Harbour.

The park is well-positioned for maximum sunlight needed to support healthy tree and grass cover. Future development of the masterplan should ensure that the proposed solar access targets are maintained.

Similarly, future development of the street network should aim to optimise sunlight available at street level to support the 30% tree canopy target established by the Masterplan.

Transport

The City supports the objective for active transport to be a key aspect of the precinct's mobility strategy.

Glebe Island Bridge will play a major role in connecting Bays West into the neighbourhoods of Balmain, Pyrmont/Ultimo, the city and beyond. Restoring the bridge as a dedicated link for people walking and cycling to and from the precinct is central to ensuring the early success of Bays West. Accordingly, we request that this component be brought forward to align with the completion of Bays West Stage 1.

Consideration should be given to how the Bays Metro station, its surrounding precinct, services, and facilities can provide a unique supplement to the activities located at other stations along the line, supporting patronage across the future Metro network.

The City also supports the objective of making Bays West a high public transport and low private vehicle precinct. In developing this aspect of the mobility strategy consideration should be given to universal access at key points of mode interchange.

The City notes the precinct needs to support access and servicing for the White Bay Cruise Terminal. However, a low vehicle environment to the proposed street bordering the southern edge of White Bay Park will provide the most successful interface between the Metro station entry and park. An option that allows for active transport, public buses, and point-to-point transport to access the Metro station, while directing heavier tour buses and private vehicles accessing the terminal around the southern edge of the precinct, could balance these priorities.

Built Form

The City supports the location of taller built forms along the southern edge of the precinct to protect from the harsh environment of the Anzac Bridge approach and south westerly winds.

The City encourages further exploration of this strategy that considers the potential for higher built form running along the length of the bridge approach, to provide a more continuous barrier between the motorway edge and the interior of the precinct. However, as discussed below, we are of the view that these barrier buildings should be non-residential.

Proposed Land Uses

The City supports the objective for land uses to be primarily commercial, retail, community, and cultural together with some residential including affordable residential. The Greater Sydney Region Plan identifies Bays West within the Innovation Corridor, and the Stage 1 area is the ideal location to accommodate employment growth. It is important that the final land use mix attains a critical mass of commercial and retail floor space to support the viability of the new centre. We recommend that an economic and employment strategy be developed at this early stage to provide further clarity in terms of employment and dwelling targets.

In deciding the proportion and location of residential floor space, careful consideration must be given to the challenging environmental conditions of the Victoria Road/Anzac Bridge approach. The Masterplan suggests residential floor space be located at the southern edge of the precinct adjacent to the bridge approach. It is important that people in apartments be protected from noise and pollution from the major traffic artery by locating commercial floor space against this edge to act as a buffer to residential buildings in the interior of the precinct. If residential uses are located as indicated, specific design guidance must be provided to respond to conditions of noise and pollution, e.g. noise barrier building forms that support healthy living environments for people with natural ventilation and protection from noise.

It is critical that a future stage of the Masterplan provide for the development of a reference design to establish and test key performance criteria for the precinct's floor space strategy.

Housing

The City supports the Masterplan's recognition of the opportunity for this new precinct on government owned land to maximise the provision of social and affordable housing. The Masterplan does not articulate specific targets for the provision of this housing. The City strongly advocates that a minimum of 25 percent of residential floor space be delivered as affordable housing in perpetuity at the initial (to 2030) and later stages (to 2040). A minimum percentage of any affordable rental housing should be delivered as housing for Aboriginal and Torres Strait Islander communities in line with Country Framework competed by Bangawarra in support of the initial Place Strategy. This is critical to enable the Bays Precinct to be a truly inclusive redevelopment that respects and celebrates Country.

The City supports the objective to develop a mechanism by which these affordable housing targets can be embedded in the statutory controls for the precinct.

Social and community infrastructure and adaptive re-use of White Bay Power Station

The City supports the conservation and adaptive reuse of the White Bay Power Station complex and related infrastructure to provide for cultural, community, commercial and retail spaces.

The location and commissioning of these spaces in the White Bay Power Station as part of Stage 1 is critical for the early success of the precinct. The Masterplan identifies the power station as the preferred location for these uses and the City supports this prioritisation to ensure necessary services are in place early to support the community as subsequent sub-precincts develop.

The City supports the provision of social infrastructure at the heart of the Bays West precinct to ensure its success as a catalyst for subsequent sub-precincts. The City advocates for the location of the multi-purpose community and library hub and cultural spaces in the White Bay Power Station and agrees with their activation in the early stages of the development.

Sustainability

It is essential that the precinct is developed in a sustainable manner that reduces the development's ecological and carbon impacts at all stages of the development, and ensures the future community is resilient to the impacts of climate change.

The draft Stage 1 Sustainability Framework is supported; however, it remains unclear how the aspirations contained within the Framework are proposed to be delivered.

Further information is required to convey how the measures contained within the framework are to be translated into targets, principles, guidelines and controls, and how development will be monitored and assessed to ensure sustainability targets are ultimately delivered.

Glebe Island Silos Advertising

The ongoing use of the Glebe Island Silos for the purpose of advertising has long been opposed by the City as a blight on the Sydney skyline.

The signage is presently permitted to be externally illuminated until 1am each day, which will be incompatible with any future residential development within the precinct and are inconsistent with the aspiration to deliver a world class precinct.

While we acknowledge that the proposal for ongoing use of the Glebe Island Silos is separate to this process, further extensions may stymie the delivery of development within Bays West. Consideration must be given to bringing third-party advertising on the silos (which began as a temporary proposal to support the NSW Government's bid for the 2000 Olympic bid) to an end.

Should you wish to speak with a Council officer about the above, please contact Christopher Ashworth, Senior Planner, on [REDACTED] or at [REDACTED]

Yours sincerely,

A handwritten signature in black ink, appearing to read 'G Jahn', written in a cursive style.

Graham Jahn AM LFRIA Hon FPIA
Director
City Planning | Development | Transport



DOC22/421641-1

Bays West Precinct Team
NSW Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Dear Bays West Precinct Team

Thank you for providing the NSW Environment Protection Authority (**EPA**) an opportunity to comment on the *Bays West Stage 1 draft Master Plan (draft Master Plan)*.

The EPA understands that the NSW Department Planning and Environment (**DPE**) has prepared the draft Master Plan to inform development and planning controls for the area around the White Bay Power Station and the future Bays Metro station.

The EPA previously provided comments on the Bays West Place Strategy in early 2021 (**DOC21/279382-1**), where we raised issues over potential land use conflict by introducing new mixed-use developments in the area. Specifically, the EPA licenses several activities in Bays West, predominantly in the Glebe Island and White Bay areas, under the *Protection of the Environment Operations Act 1997 (POEO Act)*.

The EPA strongly recommends that the draft Master Plan has clear air, noise and water quality considerations and requirements that reduce the risk of land use conflict as well as consideration of the cumulative impacts from industry, infrastructure, and other land uses to ensure future developments are approved within a broader Bays West area context. **Annexure 1** provides more detailed comments to assist in finalising the draft Master Plan.

Please contact Anthony Knox on [REDACTED] if you require further information or wish to discuss any of the comments.

Yours sincerely,

A handwritten signature in blue ink that reads 'J. Pulkinen'.

JACQUELINE PULKKINEN
Unit Head
Strategic Land Use Planning
31/5/2022

Enclosure

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Annexure A

General Context

The EPA notes that the draft Master Plan proposes to increase development adjacent to existing industrial areas, which will increase the risk of land use conflict by introducing more sensitive land uses such as mixed use development. There are already existing sources of potential land use conflict for Bays West residents, including the Glebe Island and White Bay Port, which operates 24/7, and a Multi User Facility (MUF) at Glebe Island. There is also infrastructure construction projects occurring within Bays West including West Connex, Metro West and Western Sydney Harbour Tunnel.

The port and construction activities in Bays West generate considerable noise and air emissions, and often there are limited mitigation options available to operators. As a result, the EPA receives a significant number of complaints from the residents of Pyrmont and Rozelle regarding the impacts of noise and air emissions. Complainants often report sleep disturbance and irritation, in particular when there is a ship at berth.

As both residential development and the working harbour development are proposed to increase, existing and prospective residents will be exposed to the related noise and air impacts of these surrounding port and construction activities unless these issues are adequately acknowledged and addressed in the draft Master Plan.

Air Quality, Noise and Water Quality considerations and requirements

Similar to Heritage in Section 4 “Urban design framework”, the draft Master Plan would benefit from clear considerations and requirements for air, noise and water quality. Below are some suggestions for DPE to consider.

Air Quality

The high intensity of activities in the Bays West area, including from the construction and operation of port, rail and road infrastructure, is likely to impact air quality in the area, including dust and odour. For example, the ships that deliver materials to Glebe Island and White Bay can be in port for up to week to unload, running their engines continuously whilst at berth as they need their auxiliary generator on to support liveable conditions for the crew onboard (e.g. for lighting, air conditioning, refrigeration and other onboard systems). During such periods, these ships continuously burn fuel in their engines and generate exhaust fumes.

Increasing the development in and around in the Bays West area increases the likelihood of land use conflict. Careful planning will be needed to minimise the public health impacts that can arise from co-locating sensitive developments near port, road and rail infrastructure that have the potential for significant air emissions.

Some basic requirements could be included in the Draft Master Plan that ensure new and existing facilities use suitable and cost-effective control equipment if necessary to reduce air pollution impacts. Proponents of new facilities should incorporate industry best-recognised management practice for the particular type of industry involved from the outset to limit the potential for air pollution problems. Operators of existing facilities should employ all practical means to prevent or minimise air pollution impacts.

Noise

The draft Master Plan provides an opportunity for DPE to avoid land use conflict by separating high noise generating activities, such as the existing port facilities, from more sensitive land uses, such as residential developments. The noise mitigation options available to the port operators are limited; if these land use conflicts are not avoided during this planning process, it will be difficult and costly for these issues to be addressed later. This will rely on residential treatments such as double-glazed

windows and insulating building elements, such as doors, walls, windows, floors, roofs and ceilings. The occupants of these new developments will have the expectation that they will be able to use any outdoor spaces without having their amenity impacted by the activities at the port.

Noise impact minimisation is best achieved by applying the following hierarchical approach to noise control:

1. Spatial separation of incompatible land use through appropriate zoning and placement of activities to minimise noise-related land use conflicts.
2. Minimising noise emissions at source through best practice selection, design, siting, construction and operation as appropriate.
3. Reducing noise impacts at receivers through best practice design, siting and construction.

The draft Master Plan could include the consideration and requirement of noise control measures into the precinct and building design to manage unavoidable noise impacts. Further information is available in the *Infrastructure SEPP* and the *Noise Guide for Local Government* (EPA, 2013). Part 3 of the *Noise Guide for Local Government* provides useful information in determining appropriate requirements.

Water Quality

Building on what is currently in the draft Master Plan, the following goals could be added as requirements in section 4.13.1:

- development that maintains or restores waterway health to support the community's values and uses of waterways, such as aquatic health and recreation; and,
- encourage integrated water cycle management that includes sustainable water supply, wastewater and stormwater management and reuse and recycling initiatives where it is safe and practicable to do so and provides the best environmental outcome.

The *Eastern City District Plan* includes actions to improve the health of catchments and waterways through a risk-based approach to managing the cumulative impacts of development. Implementation of this action is supported through application of the OEH/EPA *Risk based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions*. The draft Master Plan provides an opportunity to recognise this risk-based framework to help inform the design of water management and associated infrastructure needs and identify practical, cost-effective management actions for supporting waterway health outcomes that reflect community expectations as set out in the *NSW Water Quality and River Flow Objectives*.

SID 711



BAYS WEST STAGE ONE DRAFT MASTERPLAN

SUBMISSION FROM PORT AUTHORITY OF NSW

MAY 2022



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About Port Authority of NSW

Port Authority of New South Wales ('Port Authority') manages the navigation, security, and operational safety needs of commercial shipping in New South Wales. It is the owner and operator of the port at Glebe Island and White Bay ('Bays Port'), a key and significant part of Bays West.

Introduction

We welcome the opportunity to make a submission to the Bays West Stage One draft Master Plan 2022 ('the Master Plan'), led by the NSW Department of Planning and Environment (DPE).

As a member of DPE's Bays West Steering Committee and Project Working Groups, we broadly support the Public Domain Concept Master Plan and Urban Design Framework of the Master Plan. We appreciate the opportunity to collaborate and acknowledge the progress of the Steering Committee, Project Working Groups, and the Master Plan to date.

Port Authority supports the principles and key elements outlined in the Master Plan and accompanying documents and agree that in principle these will help transform Bays West as a place that is admired and enjoyed by people. Port Authority welcomes the recognition of the critical importance of supporting the ongoing working port and the retention of maritime industries in the Precinct, as unique assets and businesses, job creators and significant contributors to the NSW economy. The NSW Government has committed through various plans including the NSW Freight and Ports Plan and the Bays West Place Strategy to supporting these industries and integrating the land/water interface requirements through the staged delivery of the Precinct's redevelopment.

As cruise, working harbour, and port use will continue to play an ongoing role within Bays West for the foreseeable future, Port Authority believes the integration of port and working harbour uses with urban renewal presents a real long-term opportunity for ambitious innovation. We look forward to working with government agencies and stakeholders in the development of a Bays Port Innovation and Integration Plan. This Plan, as noted in the Bays West Master Plan Summary (page 33), will ensure future detailed planning of the White Bay and Glebe Island sub-precincts fully considers current and future port, maritime and working harbour uses and their integration with the future Bays West.

Respectful of adjoining stakeholders and the diverse needs of different groups, this submission draws attention to specific elements of the Master Plan and Bays West Place Based Transport Strategy (Draft), and we provide the following comments to help ensure the successful integration of land uses in Bays West.

Key Comments – Stage 1 draft Master Plan and supporting documents

Robert Street Sub-Precinct

- We note the Master Plan is for the initial stage of Bays West, being the White Bay Power Station (and Metro) and Robert Street sub-precincts and will inform requirements for rezoning, development controls and supporting infrastructure as it pertains only to the White Bay Power Station (and Metro) sub-precinct. As outlined in Section 1.1 of the Master Plan, the Robert Street Sub-precinct is not currently being considered for rezoning but forms part of the Master Plan with a focus on access and transport considerations only.
- We wish to highlight the strategic importance of the Robert Street sub-precinct between the proposed Metro Station and existing and future Ports operations, including White Bay Cruise Terminal. Whilst we support active transport links into and within the precinct, careful consideration must be made to the location and design of these networks to ensure port traffic can efficiently traverse the sub-precinct whilst ensuring safety and minimising future amenity and land use conflicts with pedestrian activity and port operations. As stated in the Section 6.6.3 of the Bays West Place Based Transport Strategy (draft) cruise, working harbour, and port use will continue to play an ongoing role for the foreseeable future, and access for private vehicles, light and heavy vehicles must be maintained in a safe and efficient manner to support the continuation of working harbour and cruise activities.
- The Bays West Stage 1 draft master plan proposes future uses that envisage an employment-led precinct with limited opportunities for residential development. We support the acknowledgement that the southern part of the Stage 1 precinct adjacent to Victoria Road and Anzac Bridge may be an appropriate location for residential uses. Whilst we are an advocate for an integrated port and the broader mix of uses across Bays West, Port Authority does not support residential uses in the Robert Street sub-precinct. Significant concern exists for both the need and appropriateness of co-locating new residential apartments directly adjacent to a 24-hour working port. Of particular importance, we note the issues of amenity, potential security requirements and potential risk to public safety associated with the location of residential buildings adjacent and directly across from freight vessels and port activities. Non-residential uses that support a blue economy are best suited as these types of uses coexist better with working harbour and port activities, minimising conflicts between different land uses.

Creating a Foreshore Access/Promenade

- We support new open spaces and foreshore access, including the introduction of new public parks, paths and cycleways. As stated in the Master Plan Summary (page 18), public domain areas around the water adjoining port and maritime uses will need to balance public access and operational requirements of port and maritime uses. Safe and managed foreshore access integrated with current and future port and working harbour land uses is therefore supported and encouraged. This will add social value and drive innovation through integration, whilst allowing for essential port and working harbour operations safe access to the waterfront and water.

Bays Port Innovation and Integration Plan

- Port Authority looks forward to leading a co-creation process with DPE and other key parts of Government, and stakeholders to shape an ambitious future for Ports land as part of Bays West. This process will consider port operations, including the ability to evolve and intensify over time, opportunities for innovation and integration with urban renewal, and the importance of providing

confidence and certainty to Port Authority stakeholders and businesses whose growth relies on the movement of people and goods through Sydney Harbour and proximity to market and supply chains that they service.

Draft Stage 1 Traffic and Transport Impact Report

- The draft Report details the hierarchy of prioritisation of movement through the Stage 1 sub-precincts. Port Authority considers that the efficient flow of cruise ship traffic and major events traffic at the White Bay Cruise Terminal (WBCT) through the White Bay Power Station and Robert Street sub-precincts is in the best interests of the desired place-based and amenity outcomes for these sub-precincts as well as the cruise industry and the customers and public accessing WBCT. Not prioritising the peaks of this traffic, when it occurs, will likely lead to local gridlock and very poor outcomes for all. Port Authority therefore advocates for through-traffic to be prioritised during peak times and suggests that a smart and flexible approach to prioritisation of movement could be taken and designed for.
- Similarly, Port Authority has no issue with either the “round the front” or “round the back” options for cruise terminal traffic to move within the White Bay Power Station (and Metro) sub-precinct. Port Authority’s main concern is ensuring that this traffic movement is undertaken efficiently with minimal impact on the flow of the traffic and to amenity and place outcomes for the sub-precinct.
- Port Authority notes the Master Plan explores an option to use a section of Robert Street for traffic from the new Bays West town centre to the White Bay Cruise Terminal (WBCT) on cruise days. Port Authority has significant concerns about this proposed road realignment and welcomes the acknowledgement in the Master Plan that any change requires further detailed investigation including the existing Conditions of Consent for WBCT.

Draft Stage 1 Bays West Sustainability Framework

- Port Authority supports the ambitions and concepts of the Sustainability Framework and looks forward to being included as a partner in future sustainability discussions. Our participation will help ensure the best outcomes for the White Bay Power Station (and Metro) and Robert Street sub-precincts, as well as enable sustainability concepts and Whole-of-Precinct outcomes. Port Authority is particularly interested in, and believes we can be a key contributor to, the following elements of the Framework:

Transport and mobility

- prioritising and enabling active mobility to the site (pedestrian and bicycle) for improved health and wellbeing
- provision for the electrification of road mobility options including infrastructure to prepare for a high degree of parking to have EV charging capability
- supporting emerging transitions in the freight network, including the electrification of logistics systems.

Climate risk and resilience

- provision of space for future energy storage (electrical and/or thermal batteries)

Public Health & Community Wellbeing

- improving local air quality by transport electrification, large-scale urban greening and eliminating on-site combustion with particular focus on arterial road interfaces
 - electric vehicle use.
- Port Authority supports the embedded concepts of GHG Emissions & Energy and Circular Economy, Supply Chain & Material. Port Authority aims to lead by example and has demonstrated our commitment by recently announcing our Net Zero target of 2040 with 100% renewable power in the Bays Port (Glebe Island and White Bay sub-precincts) by the end of 2022. Furthermore, in a world first for a dry-bulk precinct and a first in the Southern Hemisphere for a cruise terminal, Port Authority

of NSW will be installing and supplying Shore Power in the Bays Port. Port Authority will be investing nearly \$60 million for the development of a landside electricity supply for ships at 5 berths, powered by 100% certified renewable energy, set for launch of the first berth in 2024.

Draft Stage 1 Bays West Heritage Interpretation Strategy

- Port Authority broadly supports the recommendations of the draft Heritage Interpretation Strategy and looks forward to being included as a partner in the stages outlined in Section 10.1 (Implementation Process). As the major landowner in Bays West and the owner of several heritage items (both inside and outside the two sub-precincts) our partnership will help ensure that future heritage interpretation in other sub-precincts owned by Port Authority is considered holistically and in the context of the two subject sub-precincts.
- We wish to clarify that the following heritage items are on Port Authority of NSW' Section 170 Heritage and Conservation Register:
 - White Bay Power Station (Inlet) Canal – on land owned by Port Authority
 - White Bay Power Station (Outlet) Canal – partly on land owned by Port Authority
 - Glebe Island Wheat Silos – owned by Port Authority
 - Glebe Island Dyke Exposure – land owned by Port Authority.

Key Comments – Bays West Place Based Transport Strategy (Draft)

General

- Port Authority wishes to reiterate, as stated in the draft Strategy that cruise, working harbour, and port use will continue to play an ongoing role within Bays West for the foreseeable future. As a major landowner within Bays West there are confirmed uses, leases and licences across Bays Port until at least 2040 with demand for port land beyond that. Therefore, access for private vehicles, light and heavy vehicles must be maintained in a safe and efficient manner, whilst balancing the competing needs of movement and place.
- There are well acknowledged traffic and transport constraints to, through and within Bays West. These include limited access points, a constrained road network, and poor connectivity and permeability. With these constraints in mind it is important that efficient freight and ports traffic is maintained as the port supports the critical supply chain for trade and the associated construction and infrastructure industries, as well as being a key cruise destination.
- As highlighted in the NSW Freight and Ports Plan, the Precinct is home to the only remaining deep-water land-interface for commercial and coastal shipping in Sydney Harbour. It should not be underestimated that the Port's operations and strategic location makes a significant contribution to managing the movement of heavy vehicles on roads throughout the City and region, and a subsequent contribution to the management of congestion and emissions. If port operations did not exist this would amount to approximately 14.6 million additional truck kilometers.

Conclusion

We thank DPE for the opportunity to provide further comment on the Master Plan, its supporting documents and the Bays West Place Based Transport Strategy (Draft) and look forward to continued collaboration in the next phase of the process.

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Submission on Bays West Stage 1 draft Master Plan and Urban Design Framework

I write to make a submission to the Bays West Stage 1 draft Master Plan and Urban Design Framework.

I note that the Bays West precinct has been a highly contested site over the past 40 years and I acknowledge the longstanding contribution by community groups including the Glebe Society and the Balmain Association who have worked over decades to defend this site from sell-off and protect its unique heritage.

The Bays Precinct provides a unique opportunity to create a destination of national significance on Sydney's beautiful harbour. Unfortunately, the current proposal falls short of realising that vision.

This is prime publicly-owned waterfront land and public benefit should be the absolute priority for the redevelopment of this site.

That being said, the community acknowledges some of the positive aspects of the proposal which I strongly support, including plans to:

- Restore the White Bay Power Station;
- Provide open space and the required infrastructure for the Metro Station;
- Include some connected public open space along the waterfront.

This submission is informed in part by feedback from the community provided to my office during a public meeting held at Balmain Town Hall on Sunday 29 May, attended by well over 300 local residents. It is also informed by a large amount of correspondence from residents, planners, architects, ecologists and heritage professionals in the area.

One of the key issues raised which has enjoyed widespread support is to consult and consider supporting an Indigenous place name to be used instead of 'Bays West'.

Encourage a visionary approach

The Bays Precinct provides a unique opportunity to create a destination of national significance on Sydney's beautiful harbour. The Master Plan currently falls short of describing a bold vision for genuinely creative transformation.

We should be mirroring the ambition of other global cities like London's Tate Modern that has been transformed into a world-class destination through thoughtful reuse, rather than imposing on the former power station which should be the key visual element of the site. It is not even clear how much of the former power station will be used for a community use with varying gross floor area (GFA) numbers in the traffic report and the Master Plan.

The risk with this and future Master Plans is that Transport for NSW and the Department of Planning, Industry and Environment will deliver little more than a maximum-capacity real estate deal for this part of the Master Plan in order to offset the cost of the Metro project and public infrastructure, rather than an integrated bold offering that mirrors the success of internally successful waterfront regenerations.

Future modifications

The Stage 1 Master Plan contains a proposal for 130,000 sqm of GFA development. It is essential that the government provide guarantees to the community that this Master Plan will not be subject to future modifications that will massively increase this floor space.

This has been the case in similar projects including at Barangaroo where modifications had the combined effect of increasing floor space from 330,00 sqm in 2005 to 681,008 sqm in the final design. This effectively increased the size of the development by 70%, entirely outside of the strategic planning framework. What guarantees can the government provide to ensure that we won't see the same creeping modifications that undermine the intent of the original project?

Retention of the White Bay Power Station

I am pleased to see the retention of the White Bay Power Station with plans to make it a focal point of the precinct. There are many ambitious proposals for adaptive reuse of the Power Station as a significant indigenous or non-indigenous cultural centre, and our community looks forward to exploring the opportunities presented as we restore this iconic building.

I note that Table 13 in the Transport and Traffic Impact Report includes a reference to 5,100 sqm of social infrastructure even though the Power Station contains around 15,000 sqm of GFA. This implies that two thirds of the Power Station will be dedicated to non-community use and risks this heritage site becoming a glorified office building that will not realise its public benefit potential.

Our community strongly encourages the final Master Plan to dedicate the entire Power Station site to community use and social infrastructure. Can the government confirm how much of the former Power Station will be committed to what uses? The Master Plan refers to a maximum of 5,200 sqm for a multipurpose community and library hub and cultural spaces. Can we assume therefore that the remaining two thirds of the site is for a commercial purpose?

Scale of proposed development

I strongly object to the scale of proposed development in the south-western corner of the precinct, which is out of scale with Rozelle and Balmain and will dominate the heritage Power Station which should be the key visual element.

At 22 storeys, the proposed commercial building heights will be taller even than the chimneys of the Power Station and will block views from Glebe Point Road. The Power Station should remain the main landmark here and all new buildings should be subservient to the Power Station building.

Residential yields and public infrastructure

The government should be upfront with the community and clearly communicate the intentions of the site. Drip-feeding the Master Plan in stages intentionally provides incomplete information. It is only in Table 13 of the Transport and Traffic Impact Report that it describes total yield for the entire site. Substantially larger than even Barangaroo, the table reveals 829,918 sqm of development including 350,377 sqm residential and 407,108 sqm commercial, as well as 56,000 sqm for a tertiary education use and a miserable 5,100 sqm for cultural infrastructure.

The government should be honest with the public and outline their plans for a university campus as well and very large towers to accommodate commercial uses.

Almost 830,000 sqm of GFA would represent a gross overdevelopment of the site without the necessary increases in social infrastructure and services including schools, hospitals and green open space.

In addition, given the current housing crisis in NSW, government needs to actively intervene into the market to ensure affordability. Multimillion-dollar apartments overlooking the harbour would do nothing to address the affordability crisis. Considering this is publicly-owned land, the focus of any development should be on social and affordable housing.

There are currently over 50,000 applications for social housing in NSW and the developments associated with these sub-precincts provide a great opportunity to help reduce the shortfall of such housing and, at the same time, enable social integration with private residential development. The fact that there is no ambitious social or affordable housing target is a major shortcoming of this project.

I also note a discrepancy in the land use divisions provided in the Transport and Traffic Impact Report and the Urban Design Framework. Table 13 in the Transport and Traffic Impact Report details land use for the 130,000 sqm development as:

- 53,500 sqm residential
- 72,100 sqm commercial
- 5,000 sqm retail

Conversely, page 121 of the Master Plan Urban Design Framework details the land use as:

- 105,000 – 110,00 sqm commercial, community and retail
- 22,000 – 25,000 sqm residential

What are the proposed land uses in the 130,000 sqm total?

When will the government release the Bays West Strategic Master Plan Scheme Options – Yield Studies (Terroir, 2021)? It is critical that the public be able to examine this document to understand the development potential the government is considering.

Public open space

I am pleased to see the focus given to open public space, including the park, open spaces and foreshore walk, although I note the proposed park will be situated on area with flood issues which would not easily accommodate more intensive use.

Places for residents and visitors to relax and enjoy must be prioritised for the area, with spaces to allow for and encourage both active and passive recreation. In addition, there needs to be provision for sporting fields to address the chronic shortage of soccer and other sporting facilities in the inner west.

Traffic and transport

I am seriously concerned at the predicted increases in traffic to the area, which will be serviced by only a single road with two entry and exit points.

The assumptions made in the underpinning documents underplay traffic volumes and provide an incomplete picture of traffic impacts. The 5% private vehicle (PV) mode share quoted in the traffic study is frankly unachievable without a radical rethink of parking and access on-site. If the parking assumptions are replicated across the precinct there will be several thousand car parking spaces which would not allow even the 15% PV mode share to be realistic.

Even if 5% mode share was achieved it still predicts a totally unacceptable increase in local traffic including almost 1km queues on the north approach along Victoria Rd/Robert St and over 300m queues on approach from Mullens St and The Crescent/James Craig Road.

If it is not achieved, the Transport and Traffic Impact Study correctly predicts that the surrounding transport network will no longer function effectively. This will have impacts across the local area for car users but importantly also for public transport users who are dependent on buses given there is no heavy or light rail nearby.

A further traffic study is needed, accounting for the cumulative impacts of this proposal along with further plans for:

- Future stages of Bays West
- Bunnings Warehouse Rozelle
- The new Sydney Fish Markets, and
- The group of buildings bounded by Mullens St, Mansfield St and Robert St which is owned by a single landholder and has already seen several proposals for redevelopment

If the latter site is not considered at this stage, the Bays West project could consume the entire 'traffic budget' for the local area and undermine development potential of the surrounding area. The obvious way to ameliorate the traffic impact is to reduce density across the whole site and this is strongly supported.

Finally, looking within the footprint of the project, I prefer the primary road to be next to the Anzac Bridge approach as this will encourage greater pedestrian activity across the residential precinct, the Metro Station and the proposed open spaces. Further efforts to prioritise pedestrian activity and cycling across the precinct will be critical, including the absolutely essential reopening of the Glebe Island Bridge as an active transport link.

The importance of light rail

Many residents have noted that light rail is an obvious way to disperse people from the Metro Station further into Balmain or to White Bay Cruise Terminal. This would reduce the reliance on buses which contribute significantly to local traffic and ameliorate the inevitable traffic chaos this development will create. I have strongly supported an extension of the light rail to White Bay and continue to press for its adoption. Adoption of light rail can ameliorate the cruise ship traffic impact and make a significant impact on reducing PV use.

Biodiversity

Local biodiversity is under pressure from increasing urban density and competition for public open space in our parks and reserves for sporting and active recreation uses. This and future Master Plans should prioritise areas for native vegetation landscaping with the goal of attracting and promoting wildlife and birdlife.

The Master Plan presents a critical opportunity to strengthen biodiversity corridors along the harbour foreshore and adjacent precincts. All plantings in parks and public areas should be local Australian natives to provide food and shelter for native birds and animals. All efforts should be made to liaise with neighbouring authorities such as the Port Authority, Transport for NSW and Inner West Council to ensure this work is prioritised.

I strongly support the recommendations given in the White Bay Eco-Corridor Prefeasibility Study which has been provided to the relevant agencies by my office. In addition, the Master Plan should also set clear targets to improve marine and land-based biodiversity and ecological health

Ensure high street businesses are not impacted adversely

The proposed development is relatively close to Darling Street, Balmain and Rozelle's local village high street, which is home to a huge number of longstanding locally owned businesses. It is critical that this location acts to complement rather than compete with the existing high street which is critical to the success of the local suburbs.

I encourage you to consider the contents of this submission closely. If I can be of any further assistance, please do not hesitate to contact me.

Yours sincerely,



Jamie Parker MP
Member for Balmain, Parliament of NSW