



Redacted Submissions with Attachments for Blackwattle Bay

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March 2022



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Acknowledgment of Country

The Department of Planning and Environment acknowledges the Traditional Owners and Custodians of the land on which we live and work and pays respect to Elders past, present and future.

Publishing Submissions

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

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

Submissions have been grouped and published in the following documents:

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

163416

[redacted]

2038

Dear Officer,

It is nice to see Infrastructure NSW has published the plans to redevelop the site of the old Sydney Fish Market in June 2021. However, the 45-storey high-rise building proposed in the plan will cause issues to local residents living in and around Blackwattle Bay area, especially having great impact on local area with post code 2037,2038,2040. It will indeed do harm to the interest of local residents, with respect to blocking nice city view, breaking this current quiet, relaxing and enjoyable living condition, and increasing the risk of economic loss for local residents. The enclosed is a full analysis of these issues mentioned.

Thank you for your review.

Issues re Blackwattle Bay Significant Precinct Study

published by Infrastructure NSW

Dear Officer,

It is nice to see Infrastructure NSW has published the plans to redevelop the site of the old Sydney Fish Market in June 2021. However, the 45-storey high-rise building proposed in the plan will cause issues to local residents living in and around Blackwattle Bay area, especially having great impact on local area with post code 2037,2038,2040. It will indeed do harm to the interest of local residents, with respect to blocking nice city view, breaking this current quiet, relaxing and enjoyable living condition, and increasing the risk of economic loss for local residents. The below is a full analysis of these issues mentioned.

Beautiful views blocked by 45-storeys high-rises

Views of many parts of Pyrmont and Glebe will be blocked by these high-rises. The government plan indicates it will be a 156 meters high building with 45 storeys, which cannot make us more agree to the description made to this tower by Lord Mayor Clover Moore as “A Trojan horse”, or as a “wall of high-rise” by locals. The wall of high-rise will reduce the attractiveness of Blackwattle-Bay, as residents who taking a walk along the pedestrian pathway of Blackwattle Bay will no-longer enjoy the view of Pyrmont, Glebe and some part of Barangaroo. Therefore, this “wall of high-rise” plan does not add any value or benefit to our local community. Instead, it even adversely will affect local residents’ original comfortable and enjoyable life style.

Quiet, relaxing and enjoyable living condition gone

People loving to live in this area is because it has been designed as and has always been a quiet area with medium size of population, surrounding by unique and beautiful harbor view. However, according to the published plan, the completion of 45-storey high rises will bring in 2800 more residents and 5600 jobs to this small and already dense-populated area. It is not hard to imagine that how crowded and busy this small bay area will be in the future, given that the Black-wattle Bay area has little space to broaden already-narrow pedestrian walkways. Under those extreme uncontrollable urgent situations, for example, a big crowd accidentally pushing and pulling each other at the narrow walkways next to the bay, some emergency events or accidents, for example drowning, may occur.

In addition, according to the plan, though residents and flowing population (on the occasion that 5600 jobs are fulfilled) is estimated to increase dramatically, public transport has not been projected enough to meet the increasing demand

of local people. Only ferry and a new route Bus 501 will be added or redirected to the Bay. It is very obvious that the inefficiency and high cost of ferry will not do much with meeting the requirements of local busy commuters. And one bus's redirection can not be able to transmit that many numbers of people (2800 residents plus 5600 workers in this area) everyday, given the existing tram located at Fish Market and Glebe and other buses like 433,431 have already been considered as running at its full capacity during peak time of the day.

Investors or home owners facing risk of economic loss

From political and economic perspective, an area's expansion should take into account of the demographic planning and current and future economic conditions. These few years, due to the spreading of COVID-19, the loss of overseas students has made city of Sydney area suffer from huge economic loss, with the vacancy rates climbing up quickly and rental yields dropping correspondently fast.

Thinking about Australian population as a whole, the population growth is largely dependent on overseas immigrants taking in. To city of Sydney area particularly, overseas students make great contribution to local flowing population growth and economic growth. However, what will the global economic condition be like after COVID-19 and how it will affect Australia are difficult to answer at this moment, given right now disputes take places more often in the global political environment than the past, which leads to uncertainty and instability to each nation in the world. As a result, whether we can still receive as many overseas students as before is a big question. Also, immigration policy has to take the interest of national security as top priority. It will not be an easy process as before, due to current unstable political environment, such as issues of Middle East refugee. Thus, this part may make contribution to demographic growth at a lower rate in practice than what government previously projected.

Too many apartments with lower than expected population growth will lead to economic loss of those property owners of the 45-storey high rise by dropping in property price, falling in weekly rental payment and in the end a probable debt crisis. Thus, the estimation parameter applied in this current published government plan should take the above changing factors into account and adjusting the growth rate parameter accordingly.

Conclusion

It is wonderful to know NSW government is trying to make the community of Blackwattle Bay more prosperous and attractive. However, the 45-storey high-rise plan does not hit the point. A medium tall building with less floors, say around 15 floors, is preferred to see. As Pymont Action residents' group convenor Elizabeth Elenius said "we'd be happy for it to be developed at an

intermediate scale of between CBD and Glebe, we don't want to see it as an extension of the CBD.", a too tall high-rise like those ones standing in Darling Square does not fit into the local environment of Blackwattle Bay.

Last but not the least, the outlook design of those proposed buildings is equally critical. As a nice architecture design adds attractiveness to the building. Simply tall high-rises like those ones standing in Burwood NSW do really look like "Trojan Horses", unfortunately.

I strongly hope the officer who is in charge of the assessment of the proposed plan to take those issues mentioned into account before making final approval.

Thank you very much.

A local resident who loves Blackwattle Bay

182431

[redacted]

2009

We strongly believe this redevelopment creates some concerns and negatively impact us (see attachment for details).

Below are the key concerns:

- New developments will lead to a much higher density of residents putting greater strain on already struggling infrastructure and facilities

- Upon closer inspection of the document Attachment 14: Draft Design Code Final (2) and Attachment 15: Visual Impact Assessment it is now understood that one of the mixed residential towers will be towards the right-hand side of the current Bank Street + Quarry Master Drive intersection. Currently, the proposal suggests this could be as high as 18 stories. And the adjacent tower to the left of the intersection is higher than 18 stories. This presents the following challenges for the residents & owners:

Â· Reduced property value & downgraded living: 18 story building along with the adjacent building (higher) will eliminate the view to the bay altogether and residents will stare into large towers. This will have a considerably high negative impact on the investment/ asset value of 150 owners and approximately 400 people residing in [redacted]. Many of the residents had based their investment decisions on the bay views. I have advised the project team that when new construction takes place of a house a due process is followed with DA submissions. Furthermore, it drastically downgrades the living experience of current/ future residents.

Â· Increase in Noise & Vibration: Attachment 18: Noise and Vibration Assessment advises that the buildings will be planned in accordance with the codes to ensure the occupants of new towers, are not impacted by noise with correct distance & height. However, the current plan fails to advise how the new construction will have an adverse impact on current residential towers along Bank Street. I have proposed that in addition to ensuring the building height does not adversely impact the views of [redacted] plans to remedy the noise pollution & vibration are understood by doing the following:

a) Assessment done for [redacted] now to ensure the current noise pollution is understood

b) take the above assessment into account when factoring in the new construction

c) provide noise & vibration reduction for current & future residents by putting large glass panels along the Anzac bridge to deflect the noise

d) provide appropriate noise reduction for [redacted] through Noise Abatement Programs such as Double-Glazing Door & Windows and Noise reduction curtains.(NSW Gov has done this before)

Regards,

[redacted]

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

As the owner of Bayview apartments [REDACTED] we had received notification of the development plans submitted for Blackwattle Bay redevelopment along with the technical documents as plans on display. The current plans call for significant mixed-use development along Bank street with towers close to 18 stories and adjacent buildings even higher.

As the owner of this building, we strongly believe that this development creates the following concerns and negatively impact us:

a) Character: While it is mentioned the current plans have been developed in consideration of the character of the neighbourhood the following attributes of the development negate that:

- Setbacks and building height: The proposed buildings reaching higher than 18 stories it does not consider the current building heights along Bank Street which is a major setback.
- Location and size of private open space: Consultations in the past advised the Department of Planning to increase the number of open spaces considering Pymont to be one of the highest density suburbs. The current plans overlook the recommendation. The large mixed-use towers will occupy what was intended to be allocated open space with only small land allocated for open space, thus compounding the current issue of the suburb density.

b) Overshadowing: The developments along the intersection of Quarry Master Drive and Bank Street will significantly overshadow the [REDACTED]. The positioning of new towers in the current plans does not provide an accurate assessment.

c) Overlooking/loss of privacy: The residential & commercial use of the tower along Quarry Master Drive and Bank Street will create overlooking and loss of privacy and have a negative impact on us and the residents. Bayview towers were created with many apartments with balcony doors and windows facing the bay and Bank Street. The loss of privacy will negatively impact the living often resulting in residents having to down their blinds or installing other mechanisms.

d) Visual bulk of building: The development of the intersection of Quarry Master Drive and Bank Street will result in large, bulky buildings impacting the outlook of neighbours and dominate private open space areas such as apartment balconies facing the bay. The proposed developments would discourage many residents to enjoy the outdoors and prevent them from enjoying access to sunlight as they do as a result of overshadowing.

e) Overdevelopment: The plans suggest the Department's view is to go for a balanced outlook; however, this is not accurate. The addition of hundreds of apartments and office space will be considered as overdevelopment of an already congested area. As highlighted above the current fish market and private land should have been opened for the residents to have better access to open land.

f) Residential noise and vibration: The current assessments advise the buildings will be planned in accordance with the codes to ensure the occupants of new towers, are not impacted by noise with correct distance & height. However, the current plan fails to advise how the new construction will have an adverse impact on residents of [REDACTED] along Bank Street. With the increased development the noise pollution & vibration must be understood by doing the following:

- o a) assessment done for [REDACTED] now to ensure the current noise pollution as per the standards incorporated into the development
- o b) ensure take the above assessment into account when factoring the building heights of the proposed construction
- o c) provide noise & vibration reduction for current & future residents by putting large glass panels along the Anzac bridge to deflect the noise
- o d) provide appropriate noise reduction for [REDACTED] through Noise Abatement Programs such as Double-Glazing Door & Windows and Noise reduction curtains

In consideration of the above concerns, I and residents of [REDACTED], Pymont believe the heights of the buildings must be reduced significantly to not have an adverse impact. Furthermore, great effort needs to be put into understanding how the proposed plans negatively impact an already noisy and densely populated Pymont and in the particular intersection of Quarry Master Drive and Bank Street.

Please also see further comments regarding this redevelopment on the following pages.

Looking forward to a favourable and considerate response.

Yours faithfully,

[REDACTED]

166426

[redacted]

2009

Reading this SSP study and proposed. It's so shocking. 12 buildings up 156m height = 45 storeys tower. Built on the Blackwattle Bay foreshore. Along western distributors. It Seems that a high rise towers wall along the harbour. Blocking all water from the rest of pyrmont residents. Bring more traffic, more noise and more pollution to the area. Overshadowing the public domain and neighbours. It's unacceptable.

When PPPS on exhibition. We already objected to the consideration height of 156m on this site. Because it directly impacts us.

Our building is located on [redacted] pyrmont. [redacted] Over looking at Blackwattle Bay and Anzac bridge. Have a beautiful sunset view. If this tower wall was built up. It will block all these wonderful views from us. Also block our sunlights for at least 3 hours.

Sunlights and views are very important to our residents. It offset western distributor noise and pollution. Give our residents peace and happiness. Keeping building value. We really need this to remain.

Always talk, listen to the local community and give more benefit to the public. But this proposal seems to be of very little benefit to the public. But a huge impact to pyrmont residents and community. Only see more benefit to the private developers and business.

From PPPS to this SSP study and proposed. We see clearly what infrastructure NSW is trying to do. Compared the CBD 300m high tower to this proposed site 156m high tower . This doesn't make any sense. Around Blackwattle Bay foreshore buildings only 2 storeys - 6 storeys high. Why not compare them?????

In order to transform, pyrmont becomes a CBD extension. Proposal high rise towers up 45 storeys on the lower storeys building permit land. It breaks the rules. Hard to accept.

Pyrmont is a special residential suburb. Have beautiful character. Different from CBD. As 20+years pyrmont residents. We really don't want to see pyrmont become a CBD extension. All over high rise commercial and residential towers into pyrmont. Can imagine how terrible it will be . Overshadowing. Reduce sunlights. More crowded. More noise. More traffic. Ruin pyrmont character. Damage pyrmont residents' living environment.

Transformation Blackwattle Bay foreshore from old to new upgrade is a good idea. We support more open space parks and community centres on harbour foreshore for the public to enjoy. Plant more trees along the western distributor. It's good for the environment. But transformation Blackwattle Bay foreshore surrounded by high rise buildings . That's unreasonable. The impact is huge. We are strongly against this proposal.

All waterfront foreshore public domain should remain more open space parks and low rise buildings. Can't break these rules by any excuse. Special leader of infrastructure NSW. It's the wrong example.

We strongly object to this bleaching rule high rise tower proposal.

Hopefully the proponents hear our pyrmont residents and community wishes. Complying with the rules.

[redacted]







168026

[redacted]

Glebe 2037

Views on Proposal:

â€¢ Concerns that the redevelopment of site doesnâ€™t capitalise on increasing access to Public Land and foreshore.

â€¢ Concerns about increased density

â€¢ Concerns involving increased traffic movement due to the increase in residential accommodation

â€¢ Very concerned by the visual impact and potential overshadowing of the Prymont and Glebe foreshore by allowing building heights above 12 Floors and up to 156 metres.

â€¢ Concerns that the current plans have not taken into consideration the provision for the public to social distance in common areas such as in the Public Recreation Zone and during Major events.

Reasons for View

â€¢ There is an opportunity to provide the community with improved access to the site. Given it is a congested site consideration to public amenity is paramount. There has been significant public concern given the impact of construction in the Barangaroo precinct.

Name: [redacted]
Address: [redacted]

Reference: Blackwattle Bay

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- Concerns about increased density
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- Concerns that the current plans have not taken into consideration the provision for the public to social distance in common areas such as in the Public Recreation Zone and during Major events.

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- There is an opportunity to provide the community with improved access to the site. Given it is a congested site consideration to public amenity is paramount. There has been significant public concern given the impact of construction in the Barangaroo precinct.

168761

[redacted]

Pymont 2009

See attached submission

1 August 2021

BLACKWATTLE BAY STATE SIGNIFICANT PRECINCT STUDY

We object to the proposals set out in the Blackwattle Bay State Significant Precinct Study for the following reasons:

1. Height of Buildings

The proposal to have a row of buildings ranging from 22 storeys to 45 storeys so close to the harbour foreshore and between the historic Glebe and Pyrmont precincts is aesthetically, socially, and environmentally unacceptable. Buildings should be limited to 5 storeys. The shadowing caused by the proposed buildings will have an adverse effect on all the surrounding areas, including Wentworth Park and the Glebe foreshore.

This photomontage demonstrates how out of place these proposed towers are. Apart from the CBD in the background, there is no comparable development in Glebe or Pyrmont.



Photomontage of the proposed view towards the Blackwattle Bay SSP

2. Buildings too close to edge of harbour

While the provision of a foreshore path is welcome, it needs to be wider, and the buildings should be set back at least 30 metres from the water's edge. The past 18 months have shown how much residents of these areas value and use the foreshore path. This in turn has shown how the narrow path around the Glebe foreshore has not been wide enough to allow the volume of people walking, running, cycling and using scooters and skateboards to travel safely. A path of at least 30 metres is required to avoid accidents and to prevent transmission of COVID-19.

3. Privatisation of Public Land

The current fish market site is publicly owned land. It should not be used to benefit private for-profit interests. Rather, this land should be used for public recreational space. To suggest that only 30,000 m² should be open space, especially when that includes areas that are not really usable recreational space, indicates a tokenistic approach to the provision of areas for the public to use. At least 60,000 m² and preferably more should be made available for the sake of the well-being of those who live nearby.

4. Density and Traffic

The proposal to have 12 buildings, of which eight are to be between 22 and 45 storeys high, on a foreshore frontage of some half a kilometre would result in an unacceptable density in an area already highly populated. The towers, existing and being built, at Barangaroo have already destroyed one harbour foreshore. We must not ruin another part of our beautiful harbour.

Another consequence of this development would be a huge increase in traffic in an area that is already severely congested for many hours a day.

173671

[redacted]

Rozelle 2039

To Planning, Infrastructure and Environment,

I write to make an objection to the State Significant Precinct Study.

The Fish Market area clearly needs to be updated however the proposed rezoning and suggested changes are totally unacceptable.

As an Aboriginal person who cares for Country, I am profoundly disturbed that the government is considering a crass overdevelopment of this site instead of creating much needed public access to green spaces for the community's health and wellbeing. This is a one-off opportunity to deliver to the community green spaces which will be used into the future by generations of Australians and international visitors.

I'm concerned that:

The over development of the site through constructing a large and imposing high density housing development will monopolise the whole area and result in a loss of local amenity for local community members. Clearly monetary greed is prioritized " how could one not think otherwise given the proposed 1,550 apartments with 45 storey towers. It is outrageous that the residential towers would be taller than the Anzac Bridge pylons!

The area can't cope with this type of development - it will become a cold, uninviting shadowed space. It is difficult to fathom how infrastructure NSW would condone a design that aims for minimum standards for solar access in public spaces. Where is the vision and ethical practice at this time in history when government should be modelling a gold standard in solar access.

Social and affordable housing

Socially just societies are developed by creating opportunities for people from a range of diverse, socio-economic communities to share housing infrastructure. This proposal is shameful as it does not provide enough affordable housing. This is public land so it is ethically bankrupt not to provide a good mix of social housing so that people from disadvantaged backgrounds can also access employment and study opportunities in the city.

Traffic and parking impacts.

The new Sydney Fish Market will bring 1000s of people into the area each week. The area can't cope with thousands of extra residents and their parking needs. This development will create parking and traffic chaos.

Transport access is inadequate with the light rail currently at capacity (pre-COVID) with minimal opportunity for expansion, the on-demand ferry to the Fish Market was a failure and the proposed Sydney Metro stop is a significant distance from the site, not to mention inhibited pedestrian access.

Reduced public access to the foreshore

This area does not need more shops, restaurants and cafes along the foreshore " green spaces that inspire community interaction, reflection and connection to Country are

essential. Please deliver us open, green spaces for people and our native animals that share this area.

This is Aboriginal land held in trust

There will be community uproar if this land is rezoned to deliver developers an unearned financial windfall.

I cannot support this rezoning proposal and urge the Department of Planning to reject Infrastructure NSW's application and ensure that the City of Sydney becomes the consent authority.

Consider the intergenerational legacy offered by the regeneration of Country. Learn from Aboriginal people and the experiences of Covid which demonstrate the human need for opportunities to connect with the natural environment. A low-rise development, foreshore access with green spaces is needed. This land is a gift that should be given back to the community not developers.

Yours sincerely,

[redacted]

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Yours sincerely,
[redacted]

175896

[redacted]

Pymont, 2009

Please refer to the attached file.

16 August 2021

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

Re: Submission to Blackwattle Bay State Significant Precinct Study

Dear Blackwattle Bay Precinct Team

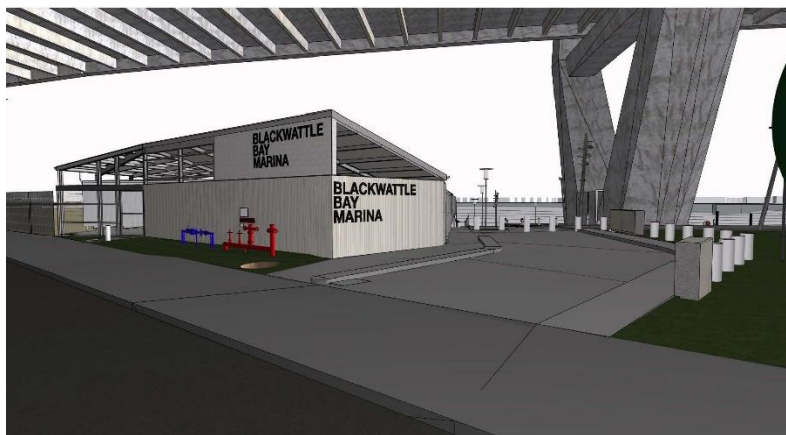
We write to provide our comments on your Blackwattle Bay Precinct Study.

1 Background

All Occasions Cruises (AOC) operates the Blackwattle Bay Marina at Bank Street, Pyrmont. The marina is a base for our own vessels, and for other government and private sector vessels operating on Sydney Harbour to which we provide berths and back of house support.

Operation of the site as a Marina is allowed under Project Approval MP 11_001 (MOD 3) (the consent), granted by NSW Department of Planning, Industry and Environment (DPIE) on 12 December 2018.

AOC holds a lease over the wetland, and a licence over the dryland, both from the landowner Transport for NSW. This present site for Blackwattle Bay Marina was nominated by Transport for NSW and Urban Growth, to allow the relocation of Blackwattle Bay Marina from its previous site, which was chosen by the NSW Government for the development of the new Sydney Fishmarkets.



Blackwattle Bay Marina at 5 Bank St Pyrmont

Maintenance of a working harbour within Blackwattle Bay is integral to the functioning of the wider Sydney Harbour given limited berth capacity and high demand, particularly from the vessels that service Sydney Harbour visitors.

Following our review of the Blackwattle Bay State Significant Precinct Study (SSPS), there is demonstrated alignment between the purpose and objectives of the SSPS and AOC's operations. We also identify an opportunity to improve this alignment.

The marina operations form an integral part of Blackwattle Bay. The site functions as a day-use charter and tourism boating facility, including associated land components (office, storage, car parking, public open space etc). The wharf serves as a berth for AOC’s own vessels, other private sector tourist vessels, and is also utilised for vessel storage by Sydney Harbour ferries. No passengers embark/disembark from the marina, in accordance with planning consent conditions.



Ferries berthed at Blackwattle Bay Marina

AOC’s operations are a key contributor to the Sydney Harbour economy and tourism industry. In a full year of operation, tens of thousands of visitors are taken by the vessels based at the marina for harbour cruises and events. The vessels also service high end visits to Australia, accommodating private tours for overseas dignitaries and celebrities.

The Blackwattle Bay marina is a space that serves the Sydney Harbour economy, the tourism industry and provides for public amenities and social infrastructure. This is elaborated on below.

AOC is grateful for the opportunity to make the following submission as part of the public consultation process associated with the Blackwattle Bay SSPS.

2 SSPS/AOC alignment

Guiding principles for the SSPS were established to align with community and stakeholder feedback. Demonstration of the alignment between AOC’s operations and the project objectives is shown in table 1.

Table 1 Project alignment

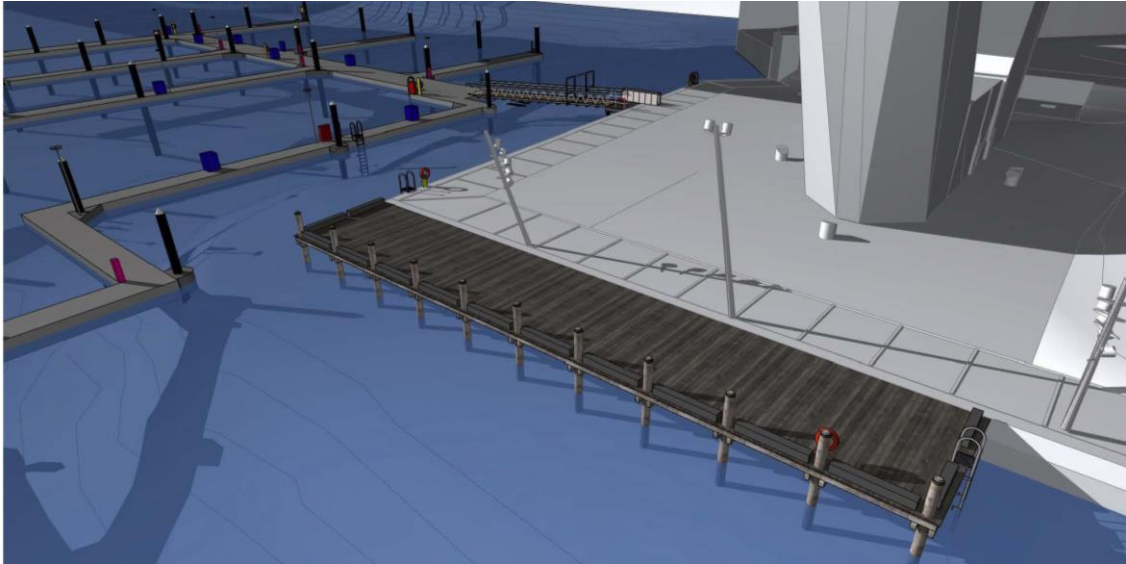
Objective

AOC alignment

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

AOC was relocated from the new fishmarket site, despite around twenty years to run on its lease. A negotiated relocation to its current site, and payment by AOC of the wetland marina construction costs, enabled the fishmarket redevelopment to go ahead.

2: Deliver a continuous foreshore promenade connecting Glebe foreshore to Pyrmont, which is activated, connected and resilient.	Construction of the new marina incorporated a publicly accessible foreshore walk at 5-11 Bank Street. This area can be immediately linked into the development of the proposed continuous waterfront promenade (uninterrupted 15km foreshore walk from Woolloomooloo to Rozelle), as detailed in the SSPS.
3: Design and deliver a high-quality public domain that links Blackwattle Bay to the foreshore and Wentworth Park and integrates with the wider public domain.	AOC have constructed a publicly accessible foreshore walk at 5-11 Bank Street. This area can be immediately linked into the development of the continuous waterfront promenade (uninterrupted 15km foreshore walk from Woolloomooloo to Rozelle), as detailed in the SSPS.
4: Provide a diverse range of land and water-based uses that are complementary to the new fish market and drive Blackwattle Bay's contribution to the Innovation Corridor and global Sydney.	<p>AOC's operations represent non-intrusive marina activities that complement the SSPS 'working harbour' objectives and contribute to the local economy.</p> <p>The location of the marina, at the northern entrance to Blackwattle Bay, avoids conflicts with other water-based activities, and provides the shortest journey to the main part of Sydney Harbour.</p>
5: Improve transport access to the surrounding area and ensure diverse customer needs are effectively managed	AOC operation provides on-site parking for staff, freeing up street parking for the general public. Should a ferry service be introduced as part of the development, the public board walk built as part of the marina would provide a suitable location for ferry passengers from adjoining residential apartments.
6: Deliver housing affordability and diversity consistent with government policy – Towards our Greater Sydney 2056 and the Eastern City District Plan	N/A
7: Implement sustainable initiatives that add to the resilience and liveability of the area including measured improvement of water quality in Blackwattle Bay	<p>The site water management system prevents contaminated discharge entering the harbour.</p> <p>Marina infrastructure is a known fish attractant, providing diverse habitat and growth in marine populations.</p> <p>Climate change and sea level rise monitoring is undertaken as part of operations.</p>
8: Provide social infrastructure including recreation and open space to support the overall population needs	Site development has allowed for public access to the foreshore, including the installation of a timber walkway. The area is frequented by walkers, joggers and fishers.
9: Optimise financial and economic benefits to NSW.	<p>The importance of commercial marinas is recognised in the SSPS (further detail is provided in Section 3).</p> <p>AOC operations are established and providing current and ongoing benefits to NSW.</p> <p>The site is utilised for vessel storage (ferries) by the NSW Government.</p>



The marina was designed to enhance public access and link to the foreshore walk

3 Site alignment

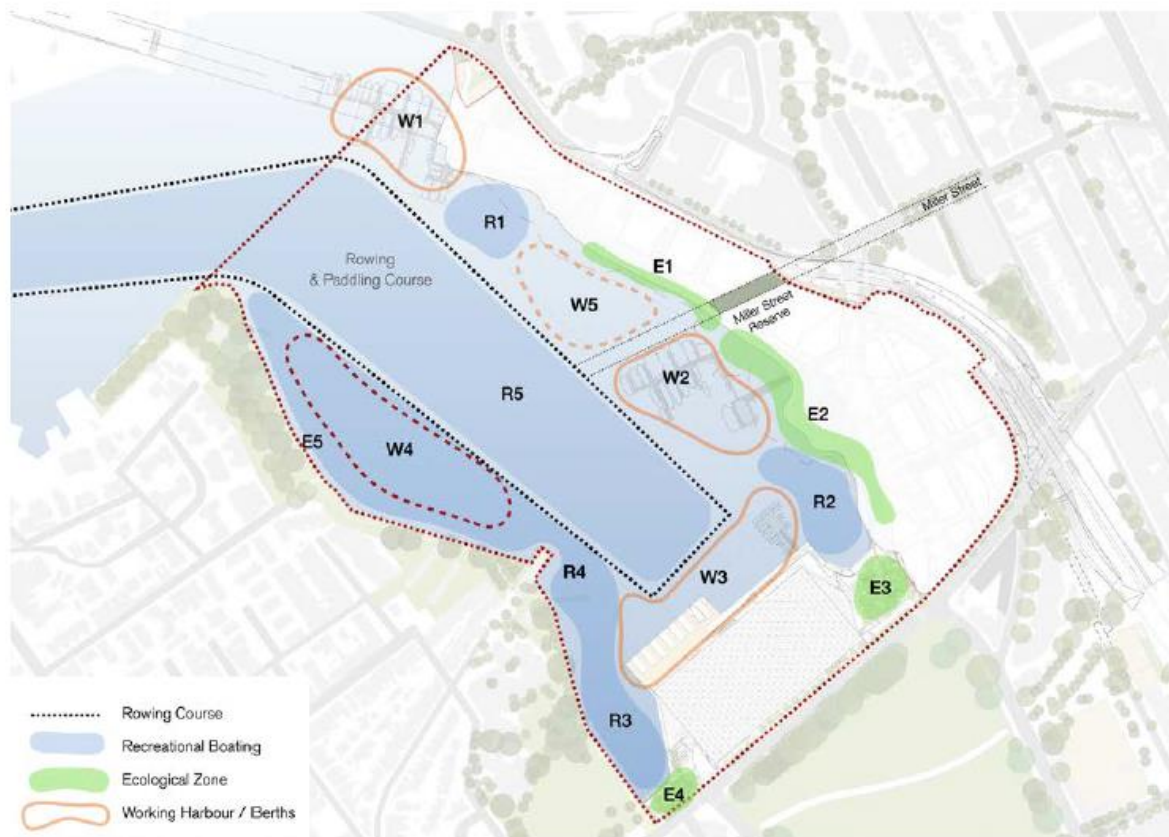
3.1 Precinct plan – identified working harbour activities

The development of the marina and public space is referenced in Section B3.6 of the SSPS¹. The current site is clearly located within the 'W1 – Proposed day charter marina' area, shown in the 'Indicative future water uses', image 1² below. This area is optimal for marina activities as it removes potential conflict with other water-based activities, such as recreational boating and kayaking, and provides the shortest route from Blackwattle Bay to the main part of Sydney Harbour. The operations of vessels in the marina co-exist happily with rowing in the Bay.

¹ Blackwattle Bay State Significant precinct Study, p 23, 14 July 2021.

² Blackwattle Bay Precinct Plan – Urban Design Statement Volume II, June 2021

Image 1: Indicative future water uses



/ Indicative Future Water Uses



Working Harbour

- W1 - Proposed day charter marina
- W2 - Proposed corporate charter marina
- W3 - Fish market and day visitor marina as proposed through new Sydney Fish Market DA
- W4 - Existing overnight moorings to remain
- W5 - Potential Future Marina

Recreational Harbour

- R1 - Existing Dragon-boat launch to remain
- R2 - Proposed Paddle craft access
- R3 - Existing Paddle craft launch to remain
- R4 - Existing Rowing craft launch to remain
- R5 - Rowing & paddling course (**Minor modification proposed through new Sydney Fish Market DA**)

Ecological Harbour

- E1 - Potential future living seawall
- E2 - Potential future living seawall & tidal pools
- E3 - Stormwater detention as proposed through new Sydney Fish Market DA
- E4 - Stormwater biofiltration as proposed through new Sydney Fish Market DA
- E5 - Potential future living seawall & tidal pools

The Urban Design Statement (SSPS attachment 3) supports the continuation of commercial marina functions as part of the Blackwattle Bay renewal:

“Commercial berth capacity in bays around Sydney Harbour is limited and demand is high. Studies indicate that Blackwattle Bay can maintain the current commercial vessel capacity whilst accommodating the new fish market and renewal of the lands in the Study Area.”³

The SSPS also supports the continuation of day charter marina functions in their current location:

³ Blackwattle Bay Precinct Plan – Urban Design Statement Volume II, p 116, June 2021

“The Bank Street marina is best suited to Day Charter functions with more frequent vessel movements able to be accommodated with minimal crossover with the passive craft movements in the rowing course.”⁴

It is clear that commercial marina functions at Bank Street are a part of Blackwattle Bays future. However, it is noted that the SSPS seems to currently identify open space on the current site of the AOC offices and back of house operations. The Bank Street open space proposal looks to enhance existing uses with additional sporting facilities and parkland. Reference is made to dry boat storage areas; however it is understood this is to support Dragonboat operations.⁵

3.2 Marina operating requirements

The Blackwattle Bay Marina site was designed and developed by Transport for NSW, to relocate All Occasion Cruises from the chosen site for the new Sydney Fishmarkets. Included in the development are

- Wharf facilities, including fixed piers, floating pontoons, three dolphins and a publicly accessible timber walkway;
- Architecturally designed, demountable office block area;
- Public space landscaping, including native fauna plantings;
- Storage and car-parking space; and
- Publicly accessible foreshore walk.

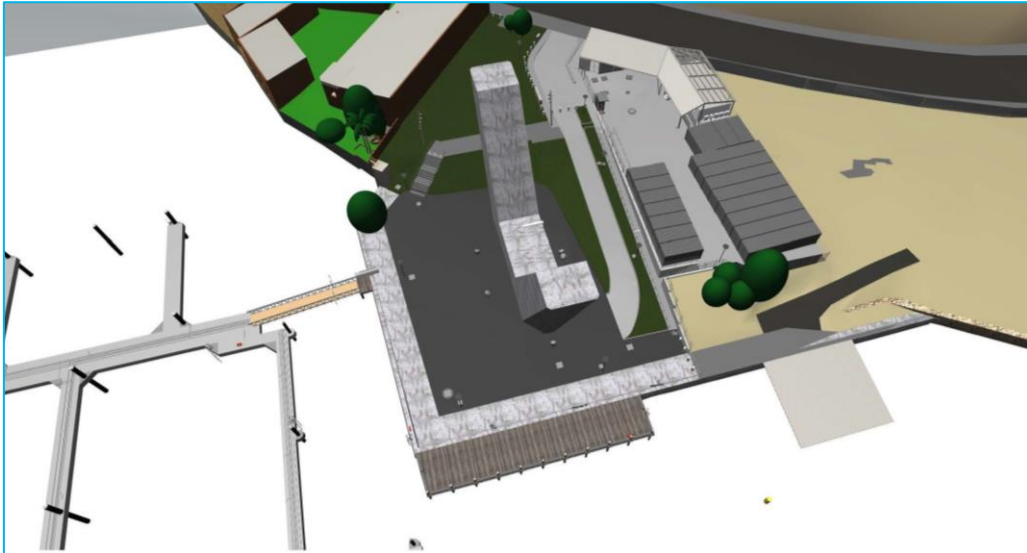
The development of the marina facilities has been at AOC’s expense, with a total of \$5M invested in the site to date by AOC, with further investment on the dryland construction by TfNSW. The marina berths and wharves require back of house facilities which are essential to the operation of the business, however it is unclear how the SSPS has allowed for continuation of the current office facilities or determined an alternate location for this aspect of the business.

However, it is noted that 1-3 Bank Street has been identified for ‘Marina Functions/Creative Arts’ within the SSPS⁶. This land parcel is currently vacant and owned by the NSW Government. The AOC operations have flexibility in the location of back of house facilities provided it is located adjacent to/in close proximity to the marina facility.

⁴ Blackwattle Bay Precinct Plan – Urban Design Statement Volume II, p 116, June 2021

⁵ Blackwattle Bay Precinct Plan – Urban Design Statement Volume II, p 161, June 2021

⁶ Blackwattle Bay State Significant precinct Study, p 89, 14 July 2021.



Back of house for the marina could be at 1-3 Bank St with re-orientation of the gangway (yellow)

AOC believes that a land-swap between 5-11 Bank Street and 1-3 Bank Street could allow for consolidation of public open space areas with the neighbouring dragon boat site and provide long-term surety for commercial marina operations. Access to the marina from another part of the foreshore is achievable with reorientation of the connecting gangway. The development of 1-3 Bank Street for back of house marina functions would further align AOC operations with SSPS objectives, including:

- Optimise land-use objectives by freeing up space at 5-11 Bank Street for public open space;
- Utilisation of an existing, dormant facility at 1-3 Bank Street;
- Allow for better designed and constructed marina storage space, integrating public amenities and social infrastructure requirements (eg – arts and creative space); and
- Provide essential security of tenure to allow AOC to further invest in its operations.

Importantly, AOC's current operations do not preclude the development scenarios put forward in the precinct study.

4 Summary

Commercial marina activities are clearly supported in the SSPS. The Urban Design Statement recognises that locations for commercial berths within Sydney Harbour are limited and that demand for berths is high. Accordingly, the Bank Street area is identified as the optimum location for commercial marina activities within Blackwattle Bay.

AOC has invested significantly in the creation of a site that aligns with the objectives of the SSPS. The established nature of the AOC operations provides a current and ongoing benefit to the Sydney Harbour and the NSW economy. Development of a publicly accessible foreshore area in front of the site allows for immediate linkage to the planned continuous waterfront promenade (Woolloomooloo to Rozelle).

Continuation of AOC operations align with the SSPS objectives and should be supported on an ongoing basis by NSW DPIE.

We would welcome the opportunity to meet with DPIE and discuss the issues raised in this submission to ensure the final plans for Blackwattle Bay align with and allow for the continuation of the AOC marina operations.

Yours sincerely

██████████

████████████████████

All Occasion Cruises

177326

[redacted]

2040

In summary, in addition to the proposed Dragonboat storage, the facilities should also cater for additional passive crafts storage.

We would like Outrigger Canoe storages (similar to the ones on the Glebe foreshore). Six 6-man outrigger canoes storage racks in additional to kayak storages would be recommended.



12 August 2021

To whom it may concern,

Blackwattle Bay State Significant Precinct Study

Thank you for the opportunity to submit a response to the Blackwattle Bay SSP Study. Bluefins Dragon Boat and Outrigger Canoe Club (BluefinsDBOCC) understands that our governing body, Dragon Boats NSW (DBNSW) has provided a comprehensive submission on behalf of all clubs who operate out of the 1-3 Bank Street site. We would like to support the submission from DBNSW and provide additional context specific to our club.

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Importance of Bank Street:

The site of 1-3 Bank Street has been the home of BluefinsDBOCC for over 20-years. BluefinsDBOCC has introduced hundreds to the sports of Dragon Boating, and Outrigger Canoeing over our 20 year history. BluefinsDBOCC has also trained corporate teams in preparation for the Lunar New Year festival regatta held at Darling Harbour, as well as run corporate team building activities out of Bank Street. The Bank Street site also holds much emotional importance to our members, many have met their life partner while training on dragon boats at the Bank Street, as well as made life-long friends.

The Bank Street Site is also used by many of our members who also represent in the NSW and Australia crew squad. The Bank Street site is the home of BluefinsDBOCC, and the soul of dragon boating in New South Wales.

Blackwattle Bay Precinct Study Position:

BluefinsDBOCC are supportive of the Blackwattle Bay SSP and are key supporters and advocates of The Bays precinct transformation. BluefinsDBOCC, through DBNSW, have been heavily involved with the community consultation and engagement process; relations with Infrastructure NSW have been excellent.

Bank Street Open Space:

Current Situation: BluefinsDBOCC and the 14 other clubs who reside at Bank Street exist with minimal facilities and access - Currently at the DBNSW Bank Street area there are:

- 24 x Dragon Boats 12.49m (L) 1.16m (W) 0.6m (H) and 250kg in weight
- 5 x racks capable of holding 30 boats
- 2 x 40ft storage containers - 12.192m (L), 2.438m (W), 2.952m (H)
- 1 x Boat Trailer
- 1 x Hand Trolley
- 48 Dragon Boat Heads and Tails

In addition to the above listed, Bluefins DBOCC, in agreement with NSW Heritage Fleet, has had additional equipment at the site for close to 15 years,

- 1x 40 foot shipping container - 12.192m (L), 2.438m (W), 2.952m (H) storing 8 single craft and other BFDDBCC equipment
- 6x 6-person outrigger canoes - 13.71m (L), 1.5m (W), 0.75m (H)



The Future of Dragon Boating and Outrigger Canoeing at Bank Street: As part of the redevelopment, BluefinsDBOCC believe now is the time to provide a permanent home for Dragon Boating in NSW together with the required facilities and access to ensure community engagement and growth of the sport continues. We believe facilities should be built to house of the sport of Dragon Boating and other paddle sports such as Outrigger Canoeing in a multidisciplinary complex, is complementary to the vision of the area's redevelopment as they are sports and recreational activities that has the ability to offer an extraordinary opportunity to reconnect the harbour, its surrounding neighbourhoods, and the city; showcasing Sydney's living culture and stories. Dragon Boating and other paddle sports like outrigger canoeing and stand-up paddleboarding plays a major part in achieving an accessible, inclusive and iconic waterfront destination that celebrates innovation, diversity and community.

Paddling, either on a Dragon Boat or on an Outrigger Canoe is a way to disconnect from the urban stress and hustle and appreciate our domain from the perspective of the water, at a cost a fraction of what it costs from aboard a yacht or tinny, making it an egalitarian sport of the many.

Positive Outcomes from the SSP:

- Proposed storage location and option for Dragon Boats as outlined in the study is a positive result for the redesign of the Bank Street Open Space.
- DBNSW is extremely encouraged by the potential opportunities to utilise the building of 1-3 Bank Street as a potential home for Dragon Boating and other community activities or organisations.
- Access to the launch ramp from the proposed storage facilities to ensure a safe and easy access to the water is positive outcome from the study.
- The creation of recreational space on the water is important to ensure active use of the area for sports and the community.

To achieve this Bluefins DBOCC believe it is vital that the redevelopment of the Bank Street Open Space encompasses:

- Safe and secure storage facilities to house 30 Dragon Boats (Current Storage capability) and scope to expand the storage facilities to house the increase in growth in boats and the sport of Dragon Boating and storage for other like-minded paddle sporting organisations such outrigger canoe clubs.
- Safe and secure storage facilities to house the gear and equipment currently stored in 3 shipping containers owned by DBNSW (2) and Bluefins DBOCC (1) at Bank Street
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- Accessibility that allows for proper usage of the facilities, amenities, and the water's edge
- High quality and inclusive community infrastructure are vital to healthy urban communities.
- More compact urban communities doesn't need to mean less access to open public space.
- Everyone wants to be safe on the water, but we need a comprehensive plan to properly manage this growth in maritime traffic.

SSP Omissions:

- While we understand the position the study has taken regarding parking. DBNSW asks the NSW Government to re-look at the needs for the area and allow for suitable parking to the area, especially for accessing the Bank Street Open Space for vehicles.
- The study does not appropriately address the need for adequate lighting to the area for users who use the area outside of daylight hours.
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- The study does not explicitly address the presence and storage of outrigger canoes (6) on the Bank street site, their stakeholders nor the future of Outrigger Canoeing at the Bank Street site.
- The relocation of the 15 DBNSW clubs during construction has not been addressed or discussed.



Bluefins DBOCC wishes to close by thanking the NSW government for the opportunity to put in a submission. We welcome the ongoing discussion and involvement of our parent association, DBNSW in the redevelopment of Blackwattle Bay. In addition, we hope our additional requests and requirements will be noted and addressed. Bluefins DBOCC works well with DBNSW and believes a multidisciplinary facility would maximise the utility, efficiency and money spent on a storage facility by having increased usage and availability to more people.

177346

[redacted]

2142

In summary, in addition to the proposed Dragonboat storage, the facilities should also cater for additional passive crafts storage.

We would like Outrigger Canoe storages (similar to the ones on the Glebe foreshore). Six 6-man outrigger canoes storage racks in additional to kayak storages would be recommended.



12 August 2021

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177831

[redacted]

Killara

Banks Street Pymont redevelopment

17 August 2021

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Blackwattle Bay State Significant Precinct Study

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Formed in 2002, Bluefins are a social & competitive Dragon Boat and Outrigger Canoeing Club based at 1-3 Bank Street, Pyrmont. We compete in events locally and abroad in events organised by DBNSW, and the Australian Outrigger Canoeing Association (AOCRA). Bluefins DBOCC achieved an outstanding record in corporate racing events and won many titles in the early years. In its 20 years, Bluefins DBOCC has continued to grow and expand - training and leading corporate teams in corporate events and also running outrigger canoe expeditions with our own 6-person outrigger canoes and single paddler canoes from our base in Pyrmont into Sydney Harbour up the Parramatta River towards Woolwich, and out towards the heads all the way to Manly Beach. Bluefins DBOCC has members all across metropolitan Sydney from St Ives, to Bonnyrigg, and from Centennial Park to West Pennant Hills. Covid-19 has hurt Bluefins DBOCC, reducing member numbers who train up to 4 days a week at the site, from our historical high of close to 60 members just before COVID-19 to 42 paddlers as at June 2021.

Importance of Bank Street:

The site of 1-3 Bank Street has been the home of Bluefins DBOCC for nearly 20-years. Our club had up to 60 paddlers, who train 3 days a week at the site in 2020. We also train corporate teams in preparation for the Lunar New Year festival, as well as run corporate team building activities. Many of our members also represent in the NSW and Australia crew squad and utilise the site for this training. The Bank Street site is our Club's home.

Blackwattle Bay Precinct Study Position:

Bluefins DBOCC are supportive of the Blackwattle Bay SSP and are key supporters and advocates of the The Bays precinct transformation. DBNSW and Bluefins DBOCC have been heavily involved with the community consultation and engagement process, relations with Infrastructure NSW have been excellent.

Bank Street Open Space:

Current Situation: Bluefins DBOCC and the 14 other clubs who reside at Bank Street exist with minimal facilities and access - Currently at our Bank Street area we have:

- 24 x Dragon Boats 12.49m (L) 1.16m (W) 0.6m (H) and 250kg in weight
- 5 x racks capable of holding 30 boats
- 2 x 40ft storage containers - 12.192m (L), 2.438m (W), 2.952m (H)
- 1 x Boat Trailer
- 1 x Hand Trolley
- 48 Dragon Boat Heads and Tails

In addition to the above listed, Bluefins DBOCC, in agreement with NSW Heritage Fleet, has had additional equipment at the site for close to 15 years,

- 1x 40 foot shipping container - 12.192m (L), 2.438m (W), 2.952m (H) storing 8 single craft and other Bluefins DBOCC equipment
- 6x 6-person outrigger canoes - 13.71m (L), 1.5m (W), 0.75m (H)

The Future of Dragon Boating at Bank Street: As part of the redevelopment, Bluefins DBOCC believe now is the time to provide a permanent home for Dragon Boating in NSW and the facilities and access to ensure community engagement and

growth of the sport continues. We believe the housing of the sport of Dragon Boating is complimentary to the vision of the development as it is a sport and recreational activity that has the ability to offer an extraordinary opportunity to reconnect the harbour, its surrounding neighbourhoods, and the city. Showcasing Sydney's living culture and stories. Dragon Boating can play a major part in achieving an inclusive and iconic waterfront destination that celebrates, innovates, diversity and community.

Positive Outcomes from the SSP:

- Proposed storage location and option for Dragon Boats as outlined in the study is a positive result for the redesign of the Bank Street Open Space.
- DBNSW is extremely encouraged by the potential opportunities to utilise the building of 1-3 Bank Street as a potential home for Dragon Boating and other community activities or organisations.
- Access to the launch ramp from the proposed storage facilities to ensure a safe and easy access to the water is positive outcome from the study.
- The creation of recreational space on the water is important to ensure active use of the area for sports and the community.

To achieve this Bluefins DBOCC believe it is vital that the redevelopment of the Bank Street Open Space encompasses:

- Safe and secure storage facilities to house 30 Dragon Boats and 6 outrigger canoes (Current Storage capability) and scope to expand the storage facilities to house the increase in growth in boats and the sport of Dragon Boating and storage for other likeminded paddle sporting organisations such as Outrigger Canoeing
- Safe and secure storage facilities to house the gear and equipment currently stored in the 3 shipping containers owned by DBNSW (2) and BluefinsDBOCC (1) and at Bank Street
- Toilets, Changerooms and Showers basic amenities to support recreational and sporting use of The Bays and to complement the home of Dragon Boating in NSW
- Club House and community space for all. Providing a real home to the sport and recreational activity of Dragon Boating and other paddling disciplines is a must for NSW and a must for community health
- Accessibility that allows for proper usage of the facilities, amenities, and water's edge
- High quality and inclusive community infrastructure are vital to healthy urban communities.
- More compact urban communities doesn't need to mean less access to open public space.
- Everyone wants to be safe on the water, so we need a comprehensive plan to properly manage the proposed growth in maritime traffic within Blackwattle Bay

SSP Omissions:

- While we understand the position the study has taken regarding parking. DBNSW ask the NSW Government to re-look at the needs for the area and allow for suitable parking to the area for vehicles, especially vehicles accessing the future Dragon Boat Storage and Bank Street Open Space.
- The study does not appropriately address the need for adequate lighting to the area for users who use the area outside of daylight hours, Outrigger paddlers currently use the site as early as 5.30am, and dragon boat users as late as 8pm.
- The study does not appropriately address the need for adequate security to the area to ensure all users who use the space feels safe and secure.
- The relocation of the 15 DBNSW clubs during construction has not been addressed or discussed.

I would like to thank NSW government for the opportunity to put in a submission and welcome the ongoing discussion and involvement of DBNSW in the redevelopment of the Blackwattle Bay area.

Yours sincerely



Bluefins DBOCC

178051

[redacted]

Pymont 2009

IN ADDITION TO THE ATTACHED DOCUMENT, CONSIDER APPROACHING THE STRATAS OF [redacted] TO PURCHASE THE BLOCKS OF LAND AND REBUILDING THIS AS PART OF THE REDEVELOPMENT PROPOSAL, AS AN INTERCONNECTED RETAIL SPACE.

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

As the owner of [redacted] we had received notification of the development plans submitted for Blackwattle Bay redevelopment along with the technical documents as plans on display. The current plans call for significant mixed-use development along Bank street with towers close to 18 stories and adjacent buildings even higher.

As a long-term owner and resident of this building, we strongly believe that this development creates the following concerns and negatively impact us:

a) Character: While it is mentioned the current plans have been developed in consideration of the character of the neighbourhood the following attributes of the development negate that:

- Setbacks and building height: The proposed buildings reaching higher than 18 stories it does not consider the current building heights along Bank Street which is a major setback.
- Location and size of private open space: Consultations in the past advised the Department of Planning to increase the number of open spaces considering Pymont to be one of the highest density suburbs. The current plans overlook the recommendation. The large mixed-use towers will occupy what was intended to be allocated open space with only small land allocated for open space, thus compounding the current issue of the suburb density.

b) Overshadowing: The developments along the intersection of Quarry Master Drive and Bank Street will significantly overshadow [redacted]. The positioning of new towers in the current plans does not provide an accurate assessment.

c) Overlooking/loss of privacy: The residential & commercial use of the tower along Quarry Master Drive and Bank Street will create overlooking and loss of privacy and have a negative impact on us and the residents. [redacted] were created with many apartments with balcony doors and windows facing the bay and Bank Street. The loss of privacy will negatively impact the living often resulting in residents having to down their blinds or installing other mechanisms.

d) Visual bulk of building: The development of the intersection of Quarry Master Drive and Bank Street will result in large, bulky buildings impacting the outlook of neighbours and dominate private open space areas such as apartment balconies facing the bay. The proposed developments would discourage many residents to enjoy the outdoors and prevent them from enjoying access to sunlight as they do as a result of overshadowing.

e) Overdevelopment: The plans suggest the Department's view is to go for a balanced outlook; however, this is not accurate. The addition of hundreds of apartments and office space will be considered as overdevelopment of an already congested area. As highlighted above the current fish market and private land should have been opened for the residents to have better access to open land.

f) Residential noise and vibration: The current assessments advise the buildings will be planned in accordance with the codes to ensure the occupants of new towers, are not impacted by noise with correct distance & height. However, the current plan fails to advise how the new construction will have an adverse impact on residents of [redacted] along Bank Street. With the increased development the noise pollution & vibration must be understood by doing the following:

- o a) assessment done for [redacted] now to ensure the current noise pollution as per the standards incorporated into the development

- b) ensure take the above assessment into account when factoring the building heights of the proposed construction
- c) provide noise & vibration reduction for current & future residents by putting large glass panels along the Anzac bridge to deflect the noise
- d) provide appropriate noise reduction for [redacted] through Noise Abatement Programs such as Double-Glazing Door & Windows and Noise reduction curtains

In consideration of the above concerns, I and residents of [redacted] believe the heights of the buildings must be reduced significantly to not have an adverse impact. Furthermore, great effort needs to be put into understanding how the proposed plans negatively impact an already noisy and densely populated Pymont and in the particular intersection of Quarry Master Drive and Bank Street.

The bank street section at the proposed planning site is often a source of income for the City of Sydney, as it is often privately hired out by various companies filming TV advertisements (Banks, Auto Manufacturers, etc).

One option for the benefit of all at [redacted] may in fact to be approach all of these owners (via the strata management companies) to ask whether purchasing all lots in these buildings would be possible. The purchase of these buildings would mean the buildings could be demolished and replaced with (as initially intended 25 years ago) retail space and mixed-use space. It would connect well with the rest of the redevelopment plans as it is in immediate proximity to the work and proposed blocks being developed.

Looking forward to a favourable and considerate response.

Yours faithfully,

[redacted]
[redacted]
[redacted]
[redacted]

178056

[redacted]

Pyrmont 2009

In document attached.

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Department of Planning, Industry and Environment
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Looking forward to a favourable and considerate response.

Yours faithfully,

[redacted]
[redacted]
[redacted]
[redacted]

178061

[redacted]

Pyrmont 2009

As attached.

SUBMISSION ON STATE SIGNIFICANT PRECINCT – BLACKWATTLE BAY

GLOBAL COMMENTS

1. Greater Sydney Commission and Planning Excellence

In one of the documents that I read when reviewing the *Blackwattle Bay State Significant Precinct Study*, I noted the concerns that the Greater Sydney Commission's concerns about the complexity of planning in the Blackwattle Bay area.

No-one can deny the amount of planning studies that the Pymont Peninsula has been subjected to. Unfortunately, I cannot believe that this most recent study would assuage the Commission's concerns. This study is perhaps the most repetitious, poorly structured/written, and hard to read document that I have had the displeasure of reading. Rather than a true planning study it is more of list of acronyms, tables and references to other studies and planning documents and what they require rather than advancing planning for the site and Pymont Peninsula and garnering support.

It also occurs to me that the report was developed to accord with the principles of the Yes Minister/Prime Minister TV series:

1. Get Rid of the Problem in the Title
 - this Study is not about Blackwattle Bay but less than 50% of it: only the portion you WANT to include in the Study
2. Is it the right weight? The report is
 - poorly structured, the report hides important comment deep in the document.
 - unbelievably repetitive and more a list of requirements from other documents and statements about "that" it responds rather than actually responding.
 - filled with numerous figures missing codes and which should have been amalgamated
 - missing all the documents frequently referred to as attachments, the contents of which should have been discussed properly in the report.

Having struggled through the report I am left with the impression that the report is intended to bore and confuse the reader to limit legitimate and reasoned response.

The number of times that the document refers to the need for future studies and decisions clearly makes it an inadequate report on which to move forward.

The report also repeatedly refers to the need for planning excellence. I have difficulty in accepting that this report represents "excellence" in any form. Just saying the words does not make it so.

2. The Precinct and Place-Based Planning

All sites or precincts exist within something of a higher order. As I commented in my submission on the new Sydney Fish market, that study sought to avoid significant issues by limiting the extent of the geographic space under consideration and sidelining the impact of that area on the surrounding. While this study report refers to the surrounding areas its treatment of them is inadequate and seems to adopt a "not our responsibility" and "somebody will look at that later" approach. How can that be planning excellence if a site is planned before its impacts on the surrounding area is known? For example, it takes 148 pages to acknowledge that further study of utilities such as water, sewerage, electricity and gas in the Pymont Peninsula is required and 154 pages to acknowledge that a Pymont Infrastructure Study is required yet seeks to develop the Blackwattle Bay Precinct as narrowly defined in advance. It is unsurprising that the Pymont community is not supportive and lacks confidence.

Rather, the Blackwattle Bay study, is myopic and essentially deals with the old Fish market site and the Bank Street foreshore – although that part of the site is primarily dependant on "future" decisions. Is this really good enough for a site of such significance and reflective of planning excellence?

My other general comments on the site are that it:

- ***Fails to address the gateway to the Bay – Glebe Island Bridge.*** This heritage item is too important to be largely ignored in a plan for Blackwattle Bay. Surely it cannot be planning excellence to deliberately ignore/defer this important but decaying heritage item to future decisions. Then, suddenly at p 134 there is an alarming statement slipped in that talks about “construction of a “new crossing” between Glebe Island and Pyrmont that “could support walking cycling and public transport”. What does this mean for the existing and much-loved Glebe Island Bridge and, if this structure or a new one is recommended it would totally change the need to funnel cycling and public transport through Pyrmont as the harbour foreshore would be a far more logical and acceptable route. This needs to be decided before the Blackwattle Bay infrastructure is constructed.
- Fails to properly deal with the roads and traffic issues that border the site. Decisions on major roads bounding the site need to be agreed before planning for the site is finalised.
- Fails to deal adequately deal with utilities infrastructure (water, sewerage, gas and electricity capacities) are properly assessed and, where necessary upgraded. Having only recently recovered from the disruption caused by the Darling Harbour redevelopment, residents of Pyrmont are rightfully concerned about future severe disruption while not only building works at Blackwattle Bay are undertaken but also a major upgrade of water and sewerage from the southern end of the Peninsula are upgraded/replaced.
- Treats surrounding areas of Pyrmont, Ultimo and Glebe differently with Pyrmont being the big loser when it comes to issues such and noise and solar impacts and the impacts being hidden and only fleetingly discussed in the latter parts of Study.
- Conflicts with previous studies such as the Pyrmont Peninsula and transport studies (the latter talking about closing and narrowing roads in Pyrmont and this study speaking about opening and widening them.
- Defines out the western foreshore of the Bay just as it does the bordering roads. I note the consultation with the Sydney College (owned and controlled by the State Government but if I was a resident of Glebe, I would fear that “Glebe is next”.
- Caves-in the commercial interests to the north of the current Fish market site including, but especially the Hymix site which is simply not congruent with the aims of the Study. Anyone who currently lives in the Miller Street area would be aware just how much concrete dust this facility spreads over the neighbouring areas. Its 24-hour operation also creates a lot of noise from trucks at night as well as its trucks being one of the major transport problems in the locality. Just because Hymix say its facility is essential does not mean it is so – it probably isn’t. It must go before the old Fish market site is redeveloped. Even the study indicates the problems it will create for the site let alone the surrounding areas.

All “private land-used, if advised now should have plenty of time to relocate before the mid 2020s and the sites then compulsorily resumed as they are inconsistent with not only the site but surrounding residential areas.

3. The World has Changed Irrevocably – Catch Up!

While I note the numerous planning studies that have been conducted in the past and their predictions of housing, commercial space, and employment needs, are used, COVID has rendered these studies out of date.

Working from home is now a fact of life and it is highly unlikely former “office-based” will return. Work will return to anything like previous levels. Health Directions also inhibit the number of workers who can occupy any space and the demand for apartment living weakened. We will not be going back to previous models and your demands should be revised to reflect this and recognise the excess of space that now exists in the CBD. There are already

predictions of a glut of office space in the CBD and retail shops there are in desperate need of additional city workers. Building office space in Blackwattle Bay will only exacerbate that problem and should be reconsidered. It is highly likely that a lot of the “Innovation Corridor” requirements can be satisfied without Blackwattle Bay.

Similarly, apartment and inner-city living has lost a lot of its attraction as working from both home and moving to regional areas has been both feasible and desirable. Your arguments about “affordable housing are also badly diminished by your acknowledgement that only 1.7% of the residential floorspace on the site will be for that purpose (as opposed to 5-10% across Greater Sydney), your failure to identify where that will be and your arguments that it should not be mixed with medium and high-end housing. Essentially, therefore you are proposing a waterfront development for the rich.

4. Impact on Pymont

Throughout your report you downplay the impact of your proposals on the existing community of Pymont. Glebe and Ultimo feature far more prominently in your report than does Pymont and your proposals frequently conflict with previous studies. Ultimately, buried deep in the document, you admit that further work is required to properly understand the impact of the proposals on Pymont – a clear indication that the site area is considered more important than the remainder of the suburb.

Pymont residents are not opposed to development, but it needs to be appropriate development. We know that the Star tower proposal is not dead, and fear being squeezed into a sunless valley with the Star blocking our morning sun and Blackwattle Bay our afternoon sun. Leaving development approvals in the control of a Minister or a Departmental Secretary simply adds to that concern and mistrust.

5. Attachments

The Study refers to 41 Attachments stating that information can be found in them – it isn’t provided in the document under review.

However, the Attachments are not provided nor are there links to them? Why is that?

DETAILED COMMENTS ON THE STUDY/REPORT’S CONTENTS

Page	Issue	Comment
xi - xiii	Increase international visitor length of stay and expenditure	Wording reveals the truth about the proposed development as an adjunct to The Star and an as a “cash-cow for the NSW Government
xiv	Precinct Plan - comprehensive urban design visions and strategy	This is highly debatable. A comprehensive Plan would properly cover all of Blackwattle Bay not just select parts and even the Study show much planning is yet to be undertaken.
xv	Extension of Miller Street	The Study exhorts the through site roads and lanes but ignores the reality of the problems that the current Fish market creates for Miller and adjacent street. The plans for the street and laneways will add problems for surrounding areas Pymont does not improve the problems there. You even admit that the transport modal mix that you are espousing is aspirational and will be difficult to achieve. Referring to extending Miller Street Saunders Street as providing vistas is also grandiose.

xiv	Glebe Island Bridge	<p>Based on the report the old Glebe Island Bridge is THE MOST SIGNIFICANT heritage item (European or First Nations) in the vicinity.</p> <p>I cannot believe that a planning body claiming “planning excellence” in place-based planning could leave the gateway to Blackwattle Bay out of the Study. The Study is monotonous about the much trumpeted “world class Fish market that will be erected at the head of the Bay. Yest the Study cannot even bring itself to admit that the Glebe Island Bridge, the most important and much-loved heritage feature in the Pymont landscape actually exists. and lies rotting. It is not only “planned out” of the Blackwattle Study, it is referred to in Figure ES2 as “Future Connection to Glebe Island”. WHAT! How can a planning authority that touts itself as delivering planning excellence leave a small sliver between 1-3 Bank Street and Evolve as unresolved in this Study? Sham eon you!</p> <p>Then, buried incredibly deep in the Study at Page 135 the Study states <i>The construction of a new crossing between Glebe Island and Pymont could support new walking, cycling and public transport links.</i> This is extremely worrying to Pymont residents concerned about our heritage and would lead us to believe that the existing bridge is going to be left to rot until cannot be salvaged and is replaced by a new structure. This cannot be allowed to happen.</p> <p>Further, as hinted at in the report a Glebe Island connection could allow a huge volume of pedestrian and cycle movements (but perhaps not public transport) to be diverted out of residential Pymont and onto the harbour foreshore.</p> <p>This matter should be resolved before development of Blackwattle Bay is commenced and cannot wait for planning of Glebe Island to be undertaken and agreed.</p>
Xvi	138,000 sqm of space for employment.	For the reasons mentioned above, I believe this is now excessive and should be downsized significantly. Mixed use blocks should remain lowered by up to 10 storeys to enable primarily residential usage.
Xvii	16 Principles	I would contend that the Study fails against Principles 5,6,11, 13 and 16 and, as such fails the test of design excellence.
9	Precinct Plan	<p>The Study states <i>The current planning framework applying to Blackwattle Bay is complex, with controls contained within several different planning instruments. This is inconsistent with planning best practice and will not facilitate the realisation of the vision for a renewed Blackwattle Bay.</i></p> <p><i>The Blackwattle Bay SSP Study outcomes will establish a new planning framework to guide the future land uses, design and development of buildings and public domain in the Precinct.</i></p> <p>That may be the authors’ view. Put simply I do not accept it. For reasons I have explained above and below I believe that the Plan is inadequate and not a sufficient basis on which to proceed.</p>
9	9 Project Objectives	To my mind the Study fails Objectives 4, 5 and 6.

9	A2.4 Project Governance	I am opposed to the proposed Governance model which completely lacks local representation. It needs to be broadened to obtain community input because State Government agencies clearly do not understand/accept Pymont community views.
10	Study Key Principles	This is the clearest example (as if one was needed) that there is no interest in the existing residents and businesses (except perhaps The Star) of Pymont. Please remember that the future of casinos in Australia and Sydney and Melbourne in particular is now under a serious cloud.
21	Privately Owned Lands	<p>Does Hymix ACTUALLY own their site??? I recall being horrified some years ago at seeing media that their "lease" had been extended by 50 years.</p> <p>Either way:</p> <ol style="list-style-type: none"> 1. I would question that any site that relies all raw materials to be trucked in is essential (maybe the output is but it could be delivered from elsewhere just as when the Hanson's facility on the new fish market site has been 2. The report clearly indicates that the facility is inconsistent with the proposed development but fails to acknowledge both the adverse noise and cement dust problems that the site creates for surrounding areas of Pymont. 3. Of course Hymix will argue that the site is essential but that does not make it true. If Hymix were given its marching orders now they would be able to relocate before the new Fish market is opened. <p>For similar reasons, I cannot see why other privately-owned lands facilities could not be successfully relocated with three years notice.</p>
23	B3.6 Other Uses	<p>This discussion is not consistent with latter information which describes 1-3 Bank Street as a local heritage item.</p> <p>There is also no clear indication of what is proposed for the "new temporary 5-year maritime facility" and the Dragon Boats storage. Relocation of the dragon Boats is never discussed.</p>
27	Gradients	<i>The gradients along some footpaths on routes towards public transport stops and major transport hubs (Town Hall and Central stations) are steep. Are you serious? Have you even walked them?</i>
28	Light Rail	Figure 11 – are you not aware of the John Street Light Rail stop or do you just not want to admit to its existence?
29	Parking	This is a clear example of the authors' myopic approach to planning. The statements are ignorant in that they deal only with "on-site" parking and ignore the "off-site" parking volumes and issues created by the infestation of small buses from The Star and the Western Suburbs that are not catered for in either the old or new Fish markets. Drivers have, in the past told us that the Council allows them to park contrary to street signs. We have observed Council Rangers walk past/ignore illegally parked vehicles in the past and have no confidence that this will not occur in the future.

30	Heritage	<p><i>"There are no heritage items of local significance in the Blackwattle Bay Study Area".</i></p> <p>Clearly defining out the Glebe Island Bridge and the assists this argument as does the Kauri Foreshores Hotel that support my arguments about the site definition. However, the Study a lot later mentions the local heritage importance of the buildings on 1-3 Bank Street – so much for planning excellence. Also excluded seem to be the two on-site parcels of Aboriginal peoples' heritage and the in-cliff cave shelter at Jacksons Landing.</p>
37	5 Big Moves	<p>It could be reasonably argued that Pymont residents are not interested/in favour of Big Moves 2 and 3. Neither of which have benefit to us.</p> <p>It is also of interest that none of the 5 Big Moves mention housing or work – two of the big principles allegedly underpinning the study.</p> <p>It may be a worthy undertaking to request a local community panel of the [redacted] blocks (and adjacent blocks) as to whether they, too, would be open to selling the land for broader and more connected development. These buildings are outdated, and would only be covered from all sides by taller buildings that would, ultimately, block much of the views sky and solar access.</p>
54	Minister may waive requirement for a master plan	<p>If the Blackwattle Bay site is as significant as claimed, how can it be argued that development of a Master Plan is unwarranted. Doing this is tantamount to stifling legitimate and important debate and should be strongly criticised.</p>
55	SLEP Heights	<p>Figure 24 is intentionally confusing in that the heights indicated do not indicate whether they are metres or floors.</p>
62-64	Reconnecting The Bay To Its Surrounds	<p>The naming of the street and lanes (e.g. Gipps) is not explained as to its connection with Pymont.</p> <p>Further, the extension of streets such as Miller and Saunders seem to have far more to with movement through the site than connecting the neighbouring areas of Pymont. In fact, connecting Miller and Saunders Streets to the foreshore are likely to increase difficulties for the residents of those streets.</p> <p>The recently installed cycleway in Miller Street is a failure (most cyclists use the newly narrowed roadway instead of the cycleway) and hated by many residents because of the problems it has created.</p>
64	Community Consultation	<p>As evidence by the statements in the Study, the community consultation has not been with residents but with bodies that might be expected to support development proposals – it is "fake" consultation</p>
71	Hymix	<p>I view the comments here as an ambit defensive position by Hymix that could not be reasonably sustained. The Hanson's plant was removed for the new Fish market and despite pressure by Hanson's it was not relocated to Glebe Island. Pressure by Hymix to remain should be similarly refuted.</p>

73	Building Heights	<p>While a majority of people may have opted for Scenario 2 that does not mean that we like it. It is akin to being asked how you want to be executed – being electrocuted, being hot or having your head removed.</p> <p>None of the three scenarios are acceptable to most Pymont residents that I have spoken to who all believe that the heights of the buildings are excessive and that they will result in significant afternoon shadowing for significant parts of Pymont village.</p> <p>The study deals with avoiding morning shadowing of Glebe and Wentworth Park but remains silent when it comes to Pymont.</p> <p>If ever The Star Tower is built, we could be in shadow in both the morning and afternoon especially in winter.</p>
75	First Nations Culture	<p>Is this it? Is this all you could come up with despite First Nations supposedly being a significant component of your philosophy?</p>
81	Roads	<p>The current Gipps Street Pymont terminates on the Eastern side of Harris Street Pymont and there appears no intention to extend it to the current Fish market site. Why then are streets in project area being called Gipps Street and Gipps Street and Gipps Lane – just as the bisected Jones Street does. Also why is the nomenclature European and not based on Aboriginal words?</p> <p>I also strongly oppose any road system on the site than promotes vehicles from the site moving through or seeking parking in the residential streets of the remainder of Pymont.</p>
85	Proposed Road Hierarchy	<p>Figure 33 shows Miller Street as a ‘Major Road’. This is both unreasonable and unacceptable to Miller Street residents. Our street has always been a busy and heavily used road and is often a bottleneck in the weekday afternoon. The recent addition of the cycleway has reduced its carrying capacity and increased the danger for accidents between bicycle and vehicular traffic. It does not have the capacity to carry additional traffic generated by the proposed Blackwattle Bay development. Through traffic should instead be funnelled onto the largely not residential Pymont Bridge Road.</p>
86	Development sensitive to adjacent development.	<p>This is not correct. Your report concentrates on open space and sun planes for Glebe Foreshore, Sydney Secondary College and Wentworth Park. It totally ignores afternoon sun planes for Pymont Village which will be completely overshadowed in the afternoon. This is unacceptable.</p> <p>For the study to justify building heights on mirroring those on Distillery Hill is also laughable. Those building are constructed on a far higher elevation, and far less floor and create far less afternoon shadowing than will those proposed for Blackwattle Bay.</p> <p>As well as shadowing the existing residential areas of Pymont Village the proposed building will also cause a loss of both views and privacy for existing dwellings.</p> <p>Yet again I must object to the myopic views expressed in the report about the need for appropriate sun-planes on site but total disregard for the sun-planes of Pymont Village.</p>

88	138,000sqm employment floor space	As stated elsewhere, I do not accept that this minimum can be justified in the posit COVID environment especially when there is so much concern for excess floor space in the nearby CBD.
93	Maximum Building Heights	<i>The proposed maximum heights will ensure that appropriate solar access protection is afforded to existing and new open spaces.</i> This is another clear example of how myopic the authors are. Your concern is for the site and totally ignore the impact of your proposals on Pymont Village. How can this possibly be “planning excellence”?
94	Affordable Housing	Your admission that only 1.7% of residential space in the development will be for affordable housing compared with 5-10% across Greater Sydney makes a mockery of the other statements in the Study proudly espousing a mix of housing types. This is further evidenced by the fact that you argue for sperate buildings for affordable housing but do not indicate where that will be. No doubt you are intending that they be in the area of the Western Distributor that you have already stated will suffer noise issues.
110-112		DCP 2012 requirements and the shadowing overlay map on p 111 clearly demonstrate the callous disregard that this Study shows for Pymont and its residents. The study constantly looks West and never East unless it is to solve an on-site problem.
119-120	Indicative Staging Plan	This Plan is extremely disappointing and will compromise the success of any development on the Fish market site for many years. It is a sell-out to commercial interests and clearly indicates that the Study is all about getting maximum economic benefit out of the current Fish market site and that anything else is peripheral and of little, no interest.
122	Promenade Width	Again, choice of Option 3 promenade width demonstrates: 1. the desire to squeeze as much money as possible out of the site and forsaking public open space for extra building space. 2. Caving into the commercial interests in Development Zone 8
125	Figure 55	Ignores the Light Rail Stop at John Street Square which would be an important access link for the northern part of the site.
126	Glebe Island Bridge	The statements at p126 are cursory and do not satisfy the requirement of SR3.6 to identify “how” the plan connects to the former Glebe Island Bridge as a possible future active transport connection to the Bays. Planning access to and through the site and ignore the significant opportunities offered by a future transport link that could significantly alter the situation cannot be “planning excellence”.
133	SR4.13 Noise & Acoustic Compatibility	Your Study shows that the Hymix facility is not compatible with the proposed land uses – even ignoring the dust that Hymix creates yet the building planning studies show that proposed buildings are intended to be constructed so as to minimise the problem. Surely this is not acceptable. The Hymix site is a problem already for existing local residents from noise, dust and transport perspectives and will become even more of an issue when the current Fish market site is redeveloped. Hymix’s assertions that the facility is essential need to be seriously tested. I do not believe them. Hanson’s relocated to allow the new Fish market and construction in Sydney survived. The same would happen if the Hymix facility was forced elsewhere.

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ACCA Dragon Boat Racing Team Incorporated (ACCA) understands that our governing body, Dragon Boats NSW (DBNSW) has provided a comprehensive submission on behalf of all clubs who operate out of the 1-3 Bank Street site. We would like to support the submission from DBNSW and have provided additional context specific to our club.



18 August 2021

To whom it may concern

Blackwattle Bay State Significant Precinct Study

Thank you for the opportunity to submit a response to the Blackwattle Bay State Significant Precinct (**SSP**) Study. ACCA Dragon Boat Racing Team Incorporated (**ACCA**) understands that our governing body, Dragon Boats NSW (**DBNSW**) has provided a comprehensive submission on behalf of all clubs who operate out of the 1-3 Bank Street site. We would like to support the submission from DBNSW and provide additional context specific to our club.

About Us:

ACCA was founded in 1984 in collaboration with the Australian Chinese Communication Association and is a founding member of the Dragon Boat Community in Sydney. ACCA is one of Australia's top ranked Dragon Boat racing clubs and has achieved consistent results off the back of its inclusive and fitness minded culture. Currently, we have 60 racing members (over 100 members across recent seasons) from a diverse range of backgrounds, ages and fitness levels, resulting in a unique and inclusive community. We have almost 4,000 followers on social media (Facebook and Instagram).

Importance of Bank Street:

The site of 1-3 Bank Street has been the home of ACCA since the club was founded (over 35 years). Our Club trains 3 days a week at the site. We also train corporate teams (KPMG, Sydney Metro) in preparation for the Lunar New Year festival, as well as run corporate team building activities. Many of our members also represent in the NSW and Australia crew squads and utilise the site for this training.

Blackwattle Bay Precinct Study Position:

ACCA are supportive of the Blackwattle Bay SSP and are key supporters and advocates of The Bays Precinct transformation. DBNSW and ACCA have been heavily involved with the community consultation and engagement process, relations with Infrastructure NSW have been excellent.

Bank Street Open Space:

Current Situation: ACCA and the 14 other clubs who reside at Bank Street exist with minimal facilities and access. Currently at our Bank Street area we have:

- 24 x Dragon Boats 12.49m (L) 1.16m (W) 0.6m (H) and 250kg in weight
- 5 x racks capable of holding 30 boats
- 2 x 40ft storage containers - 12.192m (L), 2.438m (W), 2.952m (H)
- 1 x Boat Trailer
- 1 x Hand Trolley
- 48 Dragon Boat Heads and Tails

The Future of Dragon Boating at Bank Street: As part of the redevelopment, ACCA believes that now is the time to provide a permanent home for Dragon Boating in NSW and the facilities and access to ensure community engagement and growth of the sport continues.

We believe the housing of the sport of Dragon Boating strongly aligns with the vision of the development as it is a sport and recreational activity that has the ability to offer an extraordinary opportunity to reconnect the harbour, its surrounding neighbourhoods, and the city. Showcasing Sydney's living culture and stories. Dragon Boating can play a major part in achieving an inclusive and iconic waterfront destination that celebrates, innovates, diversity and community.

The ACCA Board has informed our members of the proposed developments at Bank Street. Our members are generally supportive of the proposed developments. They are excited at the prospect of continuing to have our community based at Bank Street and having access to significantly improved facilities at Bank Street.



Positive Outcomes from the SSP:

- Proposed storage location and option for Dragon Boats as outlined in the study is a positive result for the redesign of the Bank Street Open Space.
- DBNSW is extremely encouraged by the potential opportunities to utilise the building of 1-3 Bank Street as a potential home for Dragon Boating and other community activities or organisations.
- Access to the launch ramp from the proposed storage facilities to ensure a safe and easy access to the water is positive outcome from the study.
- The creation of recreational space on the water is important to ensure active use of the area for sports and the community.

To achieve this, ACCA believes it is vital that the redevelopment of the Bank Street Open Space encompasses:

- Safe and secure storage facilities to house 30 Dragon Boats (Current Storage capability) and scope to expand the storage facilities to house the increase in growth in boats and the sport of Dragon Boating and storage for other likeminded paddle sporting organisations.
- Safe and secure storage facilities to house the gear and equipment currently stored in 2 shipping containers at Bank Street
- Toilets, Changerooms and Showers basic amenities to support recreational and sporting use of The Bays and to complement the home of Dragon Boating in NSW
- Club House and community space for all. Providing a real home to the sport and recreational activity of Dragon Boating a must for NSW and a must for community health
- Accessibility that allows for proper usage of the facilities, amenities, and water's edge
- High quality and inclusive community infrastructure are vital to healthy urban communities.
- More compact urban communities does not need to mean less access to open public space.
- Everyone wants to be safe on the water, but we need a comprehensive plan to properly manage this growth in maritime traffic.

SSP Omissions:

- While we understand the position the study has taken regarding parking. DBNSW ask the NSW Government to re-look at the needs for the area and allow for suitable parking to the area for vehicles especially in accessing the Bank Street Open Space.
- The study does not appropriately address the need for adequate lighting to the area for users who use the area outside of daylight hours.
- The study does not appropriately address the need for adequate security to the area to ensure all users who use the space feels safe and secure.
- The relocation of the 15 DBNSW clubs during construction has not been addressed or discussed.

On behalf of ACCA, we thank the NSW Government for the opportunity to make a submission and welcome the ongoing discussion and involvement of DBNSW (acting on our behalf) in the redevelopment of the Blackwattle Bay area.

Sincerely

The ACCA Board

ACCA Dragon Boat Racing Team
E: board@accadbr.com

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[redacted]

Bankstown 2200

Attached.

6 September 2021

To whom it may concern,

Blackwattle Bay State Significant Precinct Study

Thank you for the opportunity to submit a response to the Blackwattle Bay SSP Study. I am a member of Bluefins Dragon Boat and Outrigger Canoeing Club (Bluefins DBOCC), and I understand that our governing body, Dragon Boats NSW (DBNSW) has provided a comprehensive submission on behalf of all clubs who operate out of the 1-3 Bank Street site. I would like to support the submission from DBNSW and provide additional context specific to our club.

About Us:

Formed in 2002, Bluefins are a social & competitive Dragon Boat and Outrigger Canoeing Club based at 1-3 Bank Street, Pyrmont. We compete in events locally and abroad in events organised by DBNSW, and the Australian Outrigger Canoeing Association (AOCRA). Bluefins DBOCC achieved an outstanding record in corporate racing events and won many titles in the early years. In its 20 years, Bluefins DBOCC has continued to grow and expand - training and leading corporate teams in corporate events and also running outrigger canoe expeditions with our own 6-person outrigger canoes and single paddler canoes from our base in Pyrmont into Sydney Harbour up the Parramatta River towards Woolwich, and out towards the heads all the way to Manly Beach. Bluefins DBOCC has members all across metropolitan Sydney from St Ives, to Bonnyrigg, and from Centennial Park to West Pennant Hills. Covid-19 has hurt Bluefins DBOCC, reducing member numbers who train up to 4 days a week at the site, from our historical high of close to 60 members just before COVID-19 to 42 paddlers as at June 2021.

Importance of Bank Street:

The site of 1-3 Bank Street has been the home of Bluefins DBOCC for nearly 20-years. Our club had up to 60 paddlers, who train 3 days a week at the site in 2020. We also train corporate teams in preparation for the Lunar New Year festival, as well as run corporate team building activities. Many of our members also represent in the NSW and Australia crew squad and utilise the site for this training. The Bank Street site is our Club's home.

Blackwattle Bay Precinct Study Position:

Bluefins DBOCC are supportive of the Blackwattle Bay SSP and are key supporters and advocates of the The Bays precinct transformation. DBNSW and Bluefins DBOCC have been heavily involved with the community consultation and engagement process, relations with Infrastructure NSW have been excellent.

Bank Street Open Space:

Current Situation: Bluefins DBOCC and the 14 other clubs who reside at Bank Street exist with minimal facilities and access - Currently at our Bank Street area we have:

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- 1 x Boat Trailer
- 1 x Hand Trolley
- 48 Dragon Boat Heads and Tails

In addition to the above listed, Bluefins DBOCC, in agreement with NSW Heritage Fleet, has had additional equipment at the site for close to 15 years,

- 1x 40 foot shipping container - 12.192m (L), 2.438m (W), 2.952m (H) storing 8 single craft and other Bluefins DBOCC equipment
- 6x 6-person outrigger canoes - 13.71m (L), 1.5m (W), 0.75m (H)

The Future of Dragon Boating at Bank Street: As part of the redevelopment, Bluefins DBOCC believe now is the time to provide a permanent home for Dragon Boating in NSW and the facilities and access to ensure community engagement and

growth of the sport continues. We believe the housing of the sport of Dragon Boating is complimentary to the vision of the development as it is a sport and recreational activity that has the ability to offer an extraordinary opportunity to reconnect the harbour, its surrounding neighbourhoods, and the city. Showcasing Sydney's living culture and stories. Dragon Boating can play a major part in achieving an inclusive and iconic waterfront destination that celebrates, innovates, diversity and community.

Positive Outcomes from the SSP:

- Proposed storage location and option for Dragon Boats as outlined in the study is a positive result for the redesign of the Bank Street Open Space.
- DBNSW is extremely encouraged by the potential opportunities to utilise the building of 1-3 Bank Street as a potential home for Dragon Boating and other community activities or organisations.
- Access to the launch ramp from the proposed storage facilities to ensure a safe and easy access to the water is positive outcome from the study.
- The creation of recreational space on the water is important to ensure active use of the area for sports and the community.

To achieve this Bluefins DBOCC believe it is vital that the redevelopment of the Bank Street Open Space encompasses:

- Safe and secure storage facilities to house 30 Dragon Boats and 6 outrigger canoes (Current Storage capability) and scope to expand the storage facilities to house the increase in growth in boats and the sport of Dragon Boating and storage for other likeminded paddle sporting organisations such as Outrigger Canoeing
- Safe and secure storage facilities to house the gear and equipment currently stored in the 3 shipping containers owned by DBNSW (2) and Bluefins DBOCC (1) and at Bank Street
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- High quality and inclusive community infrastructure are vital to healthy urban communities.
- More compact urban communities doesn't need to mean less access to open public space.
- Everyone wants to be safe on the water, so we need a comprehensive plan to properly manage the proposed growth in maritime traffic within Blackwattle Bay

SSP Omissions:

- While we understand the position the study has taken regarding parking. DBNSW ask the NSW Government to re-look at the needs for the area and allow for suitable parking to the area for vehicles, especially vehicles accessing the future Dragon Boat Storage and Bank Street Open Space.
- The study does not appropriately address the need for adequate lighting to the area for users who use the area outside of daylight hours, Outrigger paddlers currently use the site as early as 5.30am, and dragon boat users as late as 8pm.
- The study does not appropriately address the need for adequate security to the area to ensure all users who use the space feels safe and secure.
- The relocation of the 15 DBNSW clubs during construction has not been addressed or discussed.

We would like to thank you for the opportunity to make this submission and welcome the ongoing discussion and involvement of DBNSW with regards to the redevelopment of the Blackwattle Bay area.

Best regards,

[redacted]

[redacted]

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[redacted]

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Blackwattle Bay State Significant Precinct (SSP) Study

17 August 2021

To whom it may concern,

Blackwattle Bay State Significant Precinct (SSP) Study

I would like to thank the Infrastructure NSW team for the opportunity to provide feedback on the above-mentioned SSP. I am a member of Pacific Dragons Dragon Boat and Outrigger Canoe Club. Pacific Dragons is an affiliate founding member club of Dragon Boats NSW (DBNSW) and is also an affiliate member of Australian Outrigger Canoe Racing Association (AOCRA) and Paddle NSW.

Like Pacific Dragons, I support the revitalisation and the rehabilitation of The Bays and I am strongly advocating for a permanent home for the sport and recreational activity of Dragon Boating within the Bank Street Open Space and bay area.

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

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

Importance of Bank Street:

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

I would support this opportunity for DBNSW and other water sport clubs to have a permanent home, where boats can be stored safely and close to easy, accessible launching facilities. Additionally, simple amenities such as change rooms, showers and toilets that can be used by the community.

Positive Outcomes from the SSP:

- I see the proposed safe and secure undercover storage location for Dragon Boats and other paddling sports as outlined in the study as a positive result for the redesign of the Bank Street Open Space. I am a strong supporter of this initiative and believe the proposed location and design scope is fitting to for the needs for DBNSW and their members, and the whole community.
- I am extremely encouraged by the potential opportunities to utilise the existing buildings at 1-3 Bank Street as a potential home for Dragon Boating and other community water-based activities or organisations. Given the close proximity to the water, we believe the redesign of 1-3 Bank Street should be a multi-use space and include storage for equipment as well as toilets,

change rooms and showers. I would welcome the opportunity for this location to be a club house and permanent home for DBNSW.

- The topography of the entire site and location on the harbour provides a fantastic opportunity to ensure water sports on Sydney Harbour are accessible to those of all mobilities in the community. Of note, access to the launch ramp from the proposed boat storage facilities ensures safe and easy access to the water which is a critical win from the study.

SSP Omissions:

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

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

It is important to ensure that the end product is user friendly and meets the needs of all of the community. This is a once in a lifetime opportunity for the NSW Government to make a significant contribution to the Blackwattle Bay and Inner Sydney community.

Kind regards,

[redacted]

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submission

17 August 2021

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Kind regards,

[redacted]

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[redacted]

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Please find attached letter of submission

18 August 2021

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SSP Omissions:

- While we understand the position the study has taken regarding parking. DBNSW ask the NSW Government to re-look at the needs for the area and allow for suitable parking to the area for vehicles, especially vehicles accessing the future Dragon Boat Storage and Bank Street Open Space.
- The study does not appropriately address the need for adequate lighting to the area for users who use the area outside of daylight hours, Outrigger paddlers currently use the site as early as 5.30am, and dragon boat users as late as 8pm.
- The study does not appropriately address the need for adequate security to the area to ensure all users who use the space feels safe and secure.
- The relocation of the 15 DBNSW clubs during construction has not been addressed or discussed.

I would like to thank the NSW government for the opportunity to put in a submission and welcome the ongoing discussion and involvement of DBNSW in the redevelopment of the Blackwattle Bay area.

181051

[redacted]

MAROUBRA 2035

Please see attached document

17 August 2021

To whom it may concern,

Blackwattle Bay State Significant Precinct (SSP) Study

I would like to thank the Infrastructure NSW team for the opportunity to provide feedback on the above-mentioned SSP. I am a member of Pacific Dragons Dragon Boat and Outrigger Canoe Club. Pacific Dragons is an affiliate founding member club of Dragon Boats NSW (DBNSW) and is also an affiliate member of Australian Outrigger Canoe Racing Association (AOCRA) and Paddle NSW.

Like Pacific Dragons, I support the revitalisation and the rehabilitation of The Bays and I am strongly advocating for a permanent home for the sport and recreational activity of Dragon Boating within the Bank Street Open Space and bay area.

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

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

Importance of Bank Street:

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

I would support this opportunity for DBNSW and other water sport clubs to have a permanent home, where boats can be stored safely and close to easy, accessible launching facilities. Additionally, simple amenities such as change rooms, showers and toilets that can be used by the community.

Positive Outcomes from the SSP:

- I see the proposed safe and secure undercover storage location for Dragon Boats and other paddling sports as outlined in the study as a positive result for the redesign of the Bank Street Open Space. I am a strong supporter of this initiative and believe the proposed location and design scope is fitting to for the needs for DBNSW and their members, and the whole community.
- I am extremely encouraged by the potential opportunities to utilise the existing buildings at 1-3 Bank Street as a potential home for Dragon Boating and other community water-based activities or organisations. Given the close proximity to the water, we believe the redesign of 1-3 Bank Street should be a multi-use space and include storage for equipment as well as toilets,

change rooms and showers. I would welcome the opportunity for this location to be a club house and permanent home for DBNSW.

- The topography of the entire site and location on the harbour provides a fantastic opportunity to ensure water sports on Sydney Harbour are accessible to those of all mobilities in the community. Of note, access to the launch ramp from the proposed boat storage facilities ensures safe and easy access to the water which is a critical win from the study.

SSP Omissions:

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

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

It is important to ensure that the end product is user friendly and meets the needs of all of the community. This is a once in a lifetime opportunity for the NSW Government to make a significant contribution to the Blackwattle Bay and Inner Sydney community.

Kind regards,

[redacted]

181091

[redacted]

2009

1. Greater Sydney Commission and Planning Excellence

In one of the documents that I read when reviewing the Blackwattle Bay State Significant Precinct Study, I noted the concerns that the Greater Sydney Commission's concerns about the complexity of planning in the Blackwattle Bay area.

No-one can deny the amount of planning studies that the Pymont Peninsula has been subjected to. Unfortunately, I cannot believe that this most recent study would assuage the Commission's concerns. This study is perhaps the most repetitious, poorly structured/written, and hard to read document that I have had the displeasure of reading. Rather than a true planning study it is more of list of acronyms, tables and references to other studies and planning documents and what they require rather than advancing planning for the site and Pymont Peninsula and garnering support.

Having struggled through the report I am left with the impression that the report is intended to bore and confuse the reader to limit legitimate and reasoned response.

The number of times that the document refers to the need for future studies and decisions clearly makes it an inadequate report on which to move forward.

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

As the owner of [REDACTED] 2009 I have received notification of the development plans submitted for Blackwattle Bay redevelopment along with the technical documents as plans on display. The current plans call for significant mixed-use development along Bank street with towers close to 18 stories and adjacent buildings even higher.

I have owned the apartment of over 10 years and the re-development of the waterfront for public access in Bank street with walking access to Glebe has been on the table for over 10 years.

We have over this time put up with untidy illegal industrial work on this site. Looking over to Glebe the area is pristine and Bank street over the years has been a or-sore. The redevelopment of Bank street for Public access 1 -19 Bank Street is well over due.

As a owner of [REDACTED] resident I strongly believe that this development creates the following concerns and negatively impact us:

a) Character: While it is mentioned the current plans have been developed in consideration of the character of the neighbourhood the following attributes of the development negate that:

- Setbacks and building height: The proposed buildings reaching higher than 18 stories it does not consider the current building heights along Bank Street which is a major setback.
- Location and size of private open space: Consultations in the past advised the Department of Planning to increase the number of open spaces considering Pymont to be one of the highest density suburbs. The current plans overlook the recommendation. The large mixed-use towers will occupy what was intended to be allocated open space with only small land allocated for open space, thus compounding the current issue of the suburb density.

b) Overshadowing: The developments along the intersection of Quarry Master Drive and Bank Street will significantly overshadow the [REDACTED]. The positioning of new towers in the current plans does not provide an accurate assessment.

c) Overlooking/loss of privacy: The residential & commercial use of the tower along Quarry Master Drive and Bank Street will create overlooking and loss of privacy and have a negative impact on us and the residents. Bayview towers were created with many apartments with balcony doors and windows facing the bay and Bank Street. The loss of privacy will negatively impact the living often resulting in residents having to down their blinds or installing other mechanisms.

d) Visual bulk of building: The development of the intersection of Quarry Master Drive and Bank Street will result in large, bulky buildings impacting the outlook of neighbours and dominate private open space areas such as apartment balconies facing the bay. The proposed developments would discourage many residents to enjoy the outdoors and prevent them from enjoying access to sunlight as they do as a result of overshadowing.

e) Overdevelopment: The plans suggest the Department's view is to go for a balanced outlook; however, this is not accurate. The addition of hundreds of apartments and office space will be considered as overdevelopment of an already congested area. As highlighted above the current fish market and private land should have been opened for the residents to have better access to open land.

f) Residential noise and vibration: The current assessments advise the buildings will be planned in accordance with the codes to ensure the occupants of new towers, are not impacted by noise with correct distance & height.

We don't want another Mascot Towers and adjacent buildings and Anzac Bridge suffer for new construction.

The current plan fails to advise how the new construction will have an adverse impact on residents of [REDACTED] along Bank Street. With the increased development the noise pollution & vibration must be understood by doing the following:

- o a) assessment done for [REDACTED] now to ensure the current noise pollution as per the standards incorporated into the development
- o b) ensure take the above assessment into account when factoring the building heights of the proposed construction
- o c) provide noise & vibration reduction for current & future residents by putting large glass panels along the Anzac bridge to deflect the noise
- o d) provide appropriate noise reduction for [REDACTED] through Noise Abatement

Programs such as Double-Glazing Door & Windows and Noise reduction curtains

In consideration of the above concerns, I believe the heights of the buildings must be reduced significantly to not have an adverse impact. Furthermore, great effort needs to be put into understanding how the proposed plans negatively impact an already noisy and densely populated Pymont and in the particular intersection of Quarry Master Drive and Bank Street.

1,550 new apartments is excessive in a already highly densely populated Pymont which will add to extra traffic and delays on accessing Anzac bridge. Sometimes it takes 20 minutes to get on the Anzac bridge.

Looking forward to a favourable and considerate response.

Yours faithfully,

[REDACTED]

181141

[redacted]

Pyrmont 2009

Submission attached.

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

As the owner of [redacted] we had received notification of the development plans submitted for Blackwattle Bay redevelopment along with the technical documents as plans on display. The current plans call for significant mixed-use development along Bank street with towers close to 18 stories and adjacent buildings even higher.

As the resident of this building, we strongly believe that this development creates the following concerns and negatively impact us:

a) Character: While it is mentioned the current plans have been developed in consideration of the character of the neighbourhood the following attributes of the development negate that:

- Setbacks and building height: The proposed buildings reaching higher than 18 stories it does not consider the current building heights along Bank Street which is a major setback.

- Location and size of private open space: Consultations in the past advised the Department of Planning to increase the number of open spaces considering Pymont to be one of the highest density suburbs. The current plans overlook the recommendation. The large mixed-use towers will occupy what was intended to be allocated open space with only small land allocated for open space, thus compounding the current issue of the suburb density.

b) Overshadowing: The developments along the intersection of Quarry Master Drive and Bank Street will significantly overshadow [redacted]. The positioning of new towers in the current plans does not provide an accurate assessment.

c) Overlooking/loss of privacy: The residential & commercial use of the tower along Quarry Master Drive and Bank Street will create overlooking and loss of privacy and have a negative impact on us and the residents. [redacted] were created with many apartments with balcony doors and windows facing the bay and Bank Street. The loss of privacy will negatively impact the living often resulting in residents having to down their blinds or installing other mechanisms.

d) Visual bulk of building: The development of the intersection of Quarry Master Drive and Bank Street will result in large, bulky buildings impacting the outlook of neighbours and dominate private open space areas such as apartment balconies facing the bay. The proposed developments would discourage many residents to enjoy the outdoors and prevent them from enjoying access to sunlight as they do as a result of overshadowing.

e) Overdevelopment: The plans suggest the Department's view is to go for a balanced outlook; however, this is not accurate. The addition of hundreds of apartments and office space will be considered as overdevelopment of an already congested area. As highlighted above the current fish market and private land should have been opened for the residents to have better access to open land.

f) Residential noise and vibration: The current assessments advise the buildings will be planned in accordance with the codes to ensure the occupants of new towers, are not impacted by noise with correct distance & height. However, the current plan fails to advise how the new construction will have an adverse impact on residents of [redacted] along Bank Street. With the increased development the noise pollution & vibration must be understood by doing the following:

- o a) assessment done for [redacted] now to ensure the current noise pollution as per the standards incorporated into the development

- o b) ensure take the above assessment into account when factoring the building heights of the proposed construction
- o c) provide noise & vibration reduction for current & future residents by putting large glass panels along the Anzac bridge to deflect the noise
- o d) provide appropriate noise reduction for [redacted] through Noise Abatement Programs such as Double-Glazing Door & Windows and Noise reduction curtains

In consideration of the above concerns, I and residents of [redacted] believe the heights of the buildings must be reduced significantly to not have an adverse impact. Furthermore, great effort needs to be put into understanding how the proposed plans negatively impact an already noisy and densely populated Pymont and in the particular intersection of Quarry Master Drive and Bank Street.

Looking forward to a favourable and considerate response.

Yours faithfully,

[redacted]

[redacted]

181146

[redacted]

Pyrmont 2009

Submission attached.

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

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

As the resident of this building, we strongly believe that this development creates the following concerns and negatively impact us:

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b) Overshadowing: The developments along the intersection of Quarry Master Drive and Bank Street will significantly overshadow [REDACTED]. The positioning of new towers in the current plans does not provide an accurate assessment.

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- o b) ensure take the above assessment into account when factoring the building heights of the proposed construction
- o c) provide noise & vibration reduction for current & future residents by putting large glass panels along the Anzac bridge to deflect the noise
- o d) provide appropriate noise reduction for [REDACTED] through Noise Abatement Programs such as Double-Glazing Door & Windows and Noise reduction curtains

In consideration of the above concerns, I and residents of [REDACTED] Pymont believe the heights of the buildings must be reduced significantly to not have an adverse impact. Furthermore, great effort needs to be put into understanding how the proposed plans negatively impact an already noisy and densely populated Pymont and in the particular intersection of Quarry Master Drive and Bank Street.

Looking forward to a favourable and considerate response.

Yours faithfully,

[REDACTED]
[REDACTED]

181321

[redacted]

Pymont

Visual Impact

The view from the Glebe Foreshore will be dramatically impacted. The Glebe Foreshore is extremely popular for all sorts of recreation and is appealing due to the views across the bay and the CBD skyline and its unobstructed sunshine from early morning. All four viewpoints from the Glebe Foreshore have had High or Moderate/High visual impact rating (the two highest of 5 ratings), indicating that this proposed development would severely downgrade this important recreational space and it would also considerably impact all the residents in proximity of the foreshore. In view of the massive impact this proposal has it is essential that the maximal building height is lowered to the extent that no visual impact rating is higher than Low/Moderate.

Overshadowing and wind tunnels

The towers will create a wall of buildings blocking the surrounding area, overshadow large sections of the foreshore and surrounding streets on the foreshore walk, and produce wind tunnels between the buildings. This will make for a very unpleasant environment that will not be used and will fall well short of being a "world class" harbour. Distillery Drive Pymont is evidence of how tall structures create wind tunnels.

Overdevelopment

Pymont is already a highly densely populated suburb. An additional 2,800 residents will further increase the density and severely impact the current village atmosphere, create an overcrowded unpleasant and congested suburb.

Solar impact

The application states that "no additional solar impact will occur between 9 am and 3 pm at 21 June on the Glebe Foreshore or Wentworth Park". However, the Glebe Foreshore is extremely busy outside these times and particularly between 7-9 am and from 3-6 pm. The Foreshore will become an unappealing environment for residence and I envisage its usage will decline unless the building heights are lowered so that there is no "additional solar impact" from at least 7 am if not earlier.

Traffic and Transport

The proposal is based on a shift to "stretch mode share". This is a very unrealistic model based on the current situation. The proposal aims to encourage this model by "prioritising pedestrian and cyclists over private vehicles with road space reallocation". The new development will reallocate road space to cyclists and pedestrians. The existing driving congestion in and out of Pymont is already at gridlock, particularly in peak times.

The fact that currently only two of the seven investigated intersections in Pymont are below capacity according to table 3-9 (attachment 4) is another indication that this proposed plan is not realistic and if anything, dangerous once all new residents have moved in. Another issue is that the "stretch mode share"™ plan is based on a five-year-old census that only assesses travel to work for one specific day. This transpires as a very disingenuous attempt to provide data to promote the development and is not a true reflection of actual traffic movement. A study over a longer period, in a non-covid environment when residents are not in lockdown, is essential to enable a true analysis of current, and predict, future traffic movements.

Parking and Car Dependency

The planned provision of parking spaces is unrealistic with only 0.3 spaces per 1-bedroom and 0.7 spaces per 2-bedroom dwelling. I continually witness people waiting in cars for more than half an hour to get a parking spot in my street, usually in the morning peak hours and they do not depart until the beginning of afternoon peak hours. It is abundantly clear that office workers are driving to Pymont and NOT using public transport. 59% of City of Sydney residents had one or more cars in 2016 (table 3, attachment 5) but the modelling predicts that more than 70% of the Blackwattle Bay residents will not have a car. It is contradictory to assume that such a large proportion of residents will not own vehicles given the fact that the government actively promote car dependency and encourage the use of cars by continually expanding capacity on existing roads, WestConnex being a prime example.

Public Space current and future

The amount of public open space proposed is only 30%, and much of it is in shade under the Anzac Bridge approaches and deck.

The existing open space in area 1 in The Explanation of Intended Effects is currently occupied by a private lessee of the "Blackwattle Marina"™ and the minimal open space is predominantly hard surfaces and disused buildings. The space is an unpleasant and unappealing site that is mainly used by the Marina staff and guests for access to the watercrafts.

Pymont is predominantly apartments and residents do not have the benefit of enjoying the same private open space as traditional residential housing. The parks in Pymont are already heavily utilised and softer surface open space will be essential for new residents and businesses. There is a need for actual useable public open space and recreational areas, not just a calculation of unusable space that falls into an open space/recreational area equation.

1-3 Bank Street

The plans for 1-3 Bank Street are extremely vague, other than to indicate in The Explanation of Intended Effects which states:

• Area 1: 1-3 Bank Street & 5-19 Bank Street “ no change to existing RE1 zoning

• *a separate maximum height will be applied to areas of buildings under the Western Distributor

• Areas without a height indicated on the map will have nominal height applied to allow for structures in parks reserves and streets

There are no details of what the actual “separate maximum height” nor what the “nominal height” will be, which raises suspicion and concern about the future of the site.

Conclusion

I am opposed to the EXCESSIVE SIZE AND SCALE of the proposed development. It is a disproportionate overdevelopment that will severely impact the amenity of the foreshore and surrounding suburbs, create an overcrowded, overshadowed windy environment. It will not be used by residents nor encourage visitors to the area.

It is deeply concerning that the size and scale of the development appears to be driven by profit for developers who are driving the government’s decision making, as indicated by the premier on 5 October 2019 stating that “Pymont is open for business”. Communities should not be open for sale to the highest bidder.

Visual Impact

The view from the Glebe Foreshore will be dramatically impacted. The Glebe Foreshore is extremely popular for all sorts of recreation and is appealing due to the views across the bay and the CBD skyline and its unobstructed sunshine from early morning. All four viewpoints from the Glebe Foreshore have had High or Moderate/High visual impact rating (the two highest of 5 ratings), indicating that this proposed development would severely downgrade this important recreational space and it would also considerably impact all the residents in proximity of the foreshore. In view of the massive impact this proposal has it is essential that the maximal building height is lowered to the extent that no visual impact rating is higher than Low/Moderate.

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Pyrmont is predominantly apartments and residents do not have the benefit of enjoying the same private open space as traditional residential housing. The parks in Pyrmont are already heavily utilised and softer surface open space will be essential for new residents and businesses. There is a need for actual useable public open space and recreational areas, not just a calculation of unusable space that falls into an open space/recreational area equation.

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- *a separate maximum height will be applied to areas of buildings under the Western Distributor
- Areas without a height indicated on the map will have nominal height applied to allow for structures in parks reserves and streets

There are no details of what the actual "separate maximum height" nor what the "nominal height" will be, which raises suspicion and concern about the future of the site.

Conclusion

I am opposed to the **EXCESSIVE SIZE AND SCALE** of the proposed development. It is a disproportionate overdevelopment that will severely impact the amenity of the foreshore and surrounding suburbs, create an overcrowded, overshadowed windy environment. It will not be used by residents nor encourage visitors to the area.

It is deeply concerning that the size and scale of the development appears to be driven by profit for developers who are driving the government's decision making, as indicated by the premier on 5 October 2019 stating that "..... Pymont is open for business...". Communities should not be open for sale to the highest bidder.

182006

[redacted]

Parramatta

Attached



20 August 2021

Malcolm McDonald
Executive Director, Eastern Harbour City
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

Submitted via online portal

Dear Mr. McDonald,

Blackwattle Bay State Significant Precinct Study – Request for Feedback

Business Sydney is a leading advocate for Sydney as a competitive and global city. A division of Business NSW (formerly NSW Business Chamber), Business Sydney represents over 140 leading corporations. We identify, develop, and promote public policy to drive the economic growth and sustainability of our great city. Who we plan and build our city for, how we deliver great places and spaces, how we protect and enhance our urban environment, is core business for our organisation.

We welcome the opportunity to comment on the Blackwattle Bay State Significant Precinct (**SSP**) Study, and proposed, planning controls for the precinct. We support the Government's efforts to amend and simplify the current planning regulations, controlling new developments while improving quality and sustainability in NSW.

Business Sydney supports the planned renewal of the entire western harbour precinct, particularly the construction of the New Sydney Fish Market, as part of a broad Mixed Land Use model, including public dining, recreation and transport facilities to improve public access and usage, along with increased residential development and the resultant boost in economic activity in the precinct.

We broadly support the proposed planning controls as explained in the EIE, including the contained amendments to State Environmental Planning Policies, Sydney Regional Environment Plans and the Sydney Local Environment Plan.

In relation to the New Sydney Fish Market development, Business Sydney considers it necessary to ensure current Sydney Fish Market operations be fully maintained in perpetuity. This includes planning controls to ensure any future development approvals at Blackwattle Bay do not become a platform for objection to any of its necessary current operations, imperative to its long-term function and viability

This should be noted to include any new residential ownerships or tenancies in the Precinct or nearby, along with any new commercial or retail tenancies. This is crucial in ensuring the Fish Market can provide its necessary contribution to the development of Sydney's night time economy, appeal and contribution as a visitor destination. It is necessary therefore to prevent existing or future neighbours from objecting to or hindering operations of the market facility on a 24/7 basis to facilitate commercial activities, and cater for large numbers of visitors and special events.

There should also be allowances made for future expansion of Sydney Fish Market. Consideration must be given, both physically and in planning terms, for the Sydney Fish Market to expand into the future. It is important that allowance be made now, for what undoubtedly will be an expansion of the Fish Market in the decades to come.

In addition, consideration to facilitate adequate parking and access for private transport and active transport facilities, including cycleways and footpaths, as well as suitable public transport including ferry services need to be undertaken

Business Sydney also supports an integrated land use model for the SPP Study area that enables the retention and continuation of existing working harbour uses that occur in the SSP Study area, to coexist with the new surrounding land uses. This includes the importance of additional berthing capacity within Blackwattle Bay, particularly for commercial vessels, to support the ongoing demands of the working harbour, including the commercial activities of the New Fish Market.

We also support the Port Authority's recommendation that an overarching Maritime Risk Management Plan be developed for Blackwattle Bay.

Should you have any questions about this submission or would like to discuss in more detail, please feel free to contact me at [REDACTED]

Yours sincerely,

[REDACTED]

☺

[REDACTED]

[REDACTED]

on behalf of Business Sydney

Level 23, 45 Clarence Street, Sydney NSW 2000
Tel 02 9350 8119 | enquiries@businesssydney.com | businesssydney.com
ABN 63 000 014 504

182046

[redacted]

Annandale 2038

Please find attached submission file.

17 August 2021

To whom it may concern,

Blackwattle Bay State Significant Precinct (SSP) Study

I would like to thank the Infrastructure NSW team for the opportunity to provide feedback on the above-mentioned SSP. I am a member of Pacific Dragons Dragon Boat and Outrigger Canoe Club. Pacific Dragons is an affiliate founding member club of Dragon Boats NSW (DBNSW) and is also an affiliate member of Australian Outrigger Canoe Racing Association (AOCRA) and Paddle NSW.

Like Pacific Dragons, I support the revitalisation and the rehabilitation of The Bays and I am strongly advocating for a permanent home for paddling sports and non-motorised, water-based recreational activity, including Dragon Boating, within the Bank Street Open Space and Bay area.

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

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

Importance of Bank Street:

The site of 1-3 Bank Street has been the home of some of DBNSW's Premier Clubs along with the State and National Teams for nearly 20-years. Pacific Dragons have over 100 members who use the Bank St site for Dragon Boating three times a week at club sessions throughout the entire year. Our members also represent Dragon Boating at a State and National level, training at the site for those purposes regularly.

Pacific Dragons also have outrigger canoes that utilise the Bays precinct from the Glebe Foreshore three to four times a week throughout the whole year. Currently Pacific Dragons have several six man canoes, safety equipment (for example life jackets) and a trailer that does not have a permanent, safe and secure home.

Many of our members also enjoy accessing the harbour for recreation and training on personal canoes, surf skis and kayaks, with no near-water storage facilities or amenity.

I would support this opportunity for DBNSW, other water sport clubs, and passionate paddling individuals in the community, to have a permanent home, where boats can be stored safely and close to easy, accessible launching facilities. Additionally, I would support access to simple amenities such as change rooms, showers and toilets that can be used by the community.

Positive Outcomes from the SSP:

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

and design scope is fitting to for the needs for DBNSW and their members, and the whole community.

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

SSP Omissions:

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

I believe the housing of Dragon Boating and other water sports is complimentary to the vision of the development as paddling is a sport and recreational activity that has the ability to offer an extraordinary opportunity to reconnect people with the harbour, its surrounding neighbourhoods, and the city. It also provides health and wellbeing opportunities accessible to all segments of the community. And will activate the space in a unique way, not provided in other parts of the harbour.

It is important to ensure that the end product is user friendly and meets the needs of all of the community. This is a once in a lifetime opportunity for the NSW Government to make a significant contribution to the Blackwattle Bay and Inner Sydney community.

Kind regards,

██████████

182116

[redacted]

Pymont

I am writing to object to the proposed redevelopment of Blackwattle Bay.

I am concerned about the project's inconsistency with the Government's own Pymont Peninsula Place Strategy and the projected 3000 new residents that will overload existing infrastructure and amenities, including schools and health facilities.

The roads to and through Pymont are already have too much traffic, mostly heading to the Anzac Bridge or City, which makes it impossible for Pymont locals to get home through cars blocking the lanes heading into Pymont.

The towers along the foreshore exceed current allowable building heights and floor area. They are far too tall and dense and unsuitable for this location. They will block sunlight to Wentworth Park, Pymont and Ultimo. It will be unpleasant to walk between these buildings as they will be overshadowed wind tunnels.

The mean-proportioned foreshore boulevard, overshadowed and dominated by the towers, will not be an inviting, public space but a commercial retail precinct. The park proposed at the northern end of under the Anzac Bridge is an unpleasant leftover space with the least amount of real estate value, which is why it's proposed for the park. Generally the masterplan lacks much needed green space.

The incorporation of Hansen's concrete plant into the lower levels of one of the residential towers seems in inappropriate. How does a concrete plant co-exist with a residential building and green public space, especially when concrete trucks are required to enter and exit the site to transport the concrete?

There has been a lack of genuine community consultation; the previous round of feedback seems to have been largely ignored the aspirations and objections of the Pymont and Ultimo community. I also object to the commercialization of what is public land, land that belongs to the people of NSW.

[REDACTED]
[REDACTED]
Pymont, NSW, 2009

20 August 2021

Department of Planning, Industry and Environment

To Whom It May Concern,

Re: Blackwattle Bay redevelopment submission

I am writing to object to the proposed redevelopment of Blackwattle Bay.

I am concerned about the project's inconsistency with the Government's own Pymont Peninsula Place Strategy and the projected 3000 new residents that will overload existing infrastructure and amenities, including schools and health facilities.

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There has been a lack of genuine community consultation; the previous round of feedback seems to have been largely ignored the aspirations and objections of the Pymont and Ultimo community. I also object to the commercialization of what is public land, land that belongs to the people of NSW.

Your Sincerely,

[REDACTED]

182366

[redacted]

2009

We strongly believe that this development creates some concerns and negatively impact us (see attachment for details).

Below are the key concerns:

- New developments will lead to a much higher density of residents putting greater strain on already struggling infrastructure and facilities

- Upon closer inspection of the document Attachment 14: Draft Design Code Final (2) and Attachment 15: Visual Impact Assessment it is now understood that one of the mixed residential towers will be towards the right-hand side of the current Bank Street + Quarry Master Drive intersection. Currently, the proposal suggests this could be as high as 18 stories. And the adjacent tower to the left of the intersection is higher than 18 stories. This presents the following challenges for the residents & owners:

Â· Reduced property value & downgraded living: 18 story building along with the adjacent building (higher) will eliminate the view to the bay altogether and residents will stare into large towers. This will have a considerably high negative impact on the investment/ asset value of 150 owners and approximately 400 people residing in [redacted]. Many of the residents had based their investment decisions on the bay views. I have advised the project team that when new construction takes place of a house a due process is followed with DA submissions. Furthermore, it drastically downgrades the living experience of current/ future residents.

Â· Increase in Noise & Vibration: Attachment 18: Noise and Vibration Assessment advises that the buildings will be planned in accordance with the codes to ensure the occupants of new towers, are not impacted by noise with correct distance & height. However, the current plan fails to advise how the new construction will have an adverse impact on current residential towers along Bank Street. I have proposed that in addition to ensuring the building height does not adversely impact the views of [redacted] plans to remedy the noise pollution & vibration are understood by doing the following:

a) Assessment done for [redacted] now to ensure the current noise pollution is understood

b) take the above assessment into account when factoring in the new construction

c) provide noise & vibration reduction for current & future residents by putting large glass panels along the Anzac bridge to deflect the noise

d) provide appropriate noise reduction for 120 Saunders Street through Noise Abatement Programs such as Double-Glazing Door & Windows and Noise reduction curtains.(NSW Gov has done this before)

Regards,

[redacted]

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

As the owner of Bayview apartments [REDACTED] we had received notification of the development plans submitted for Blackwattle Bay redevelopment along with the technical documents as plans on display. The current plans call for significant mixed-use development along Bank street with towers close to 18 stories and adjacent buildings even higher.

As the owner of this building, we strongly believe that this development creates the following concerns and negatively impact us:

a) Character: While it is mentioned the current plans have been developed in consideration of the character of the neighbourhood the following attributes of the development negate that:

- Setbacks and building height: The proposed buildings reaching higher than 18 stories it does not consider the current building heights along Bank Street which is a major setback.
- Location and size of private open space: Consultations in the past advised the Department of Planning to increase the number of open spaces considering Pymont to be one of the highest density suburbs. The current plans overlook the recommendation. The large mixed-use towers will occupy what was intended to be allocated open space with only small land allocated for open space, thus compounding the current issue of the suburb density.

b) Overshadowing: The developments along the intersection of Quarry Master Drive and Bank Street will significantly overshadow the [REDACTED]. The positioning of new towers in the current plans does not provide an accurate assessment.

c) Overlooking/loss of privacy: The residential & commercial use of the tower along Quarry Master Drive and Bank Street will create overlooking and loss of privacy and have a negative impact on us and the residents. Bayview towers were created with many apartments with balcony doors and windows facing the bay and Bank Street. The loss of privacy will negatively impact the living often resulting in residents having to down their blinds or installing other mechanisms.

d) Visual bulk of building: The development of the intersection of Quarry Master Drive and Bank Street will result in large, bulky buildings impacting the outlook of neighbours and dominate private open space areas such as apartment balconies facing the bay. The proposed developments would discourage many residents to enjoy the outdoors and prevent them from enjoying access to sunlight as they do as a result of overshadowing.

e) Overdevelopment: The plans suggest the Department's view is to go for a balanced outlook; however, this is not accurate. The addition of hundreds of apartments and office space will be considered as overdevelopment of an already congested area. As highlighted above the current fish market and private land should have been opened for the residents to have better access to open land.

f) Residential noise and vibration: The current assessments advise the buildings will be planned in accordance with the codes to ensure the occupants of new towers, are not impacted by noise with correct distance & height. However, the current plan fails to advise how the new construction will have an adverse impact on residents of [REDACTED] along Bank Street. With the increased development the noise pollution & vibration must be understood by doing the following:

- o a) assessment done for [REDACTED] now to ensure the current noise pollution as per the standards incorporated into the development
- o b) ensure take the above assessment into account when factoring the building heights of the proposed construction
- o c) provide noise & vibration reduction for current & future residents by putting large glass panels along the Anzac bridge to deflect the noise
- o d) provide appropriate noise reduction for [REDACTED] through Noise Abatement Programs such as Double-Glazing Door & Windows and Noise reduction curtains

In consideration of the above concerns, I and residents of [REDACTED] believe the heights of the buildings must be reduced significantly to not have an adverse impact. Furthermore, great effort needs to be put into understanding how the proposed plans negatively impact an already noisy and densely populated Pymont and in the particular intersection of Quarry Master Drive and Bank Street.

Please also see further comments regarding this redevelopment on the following pages.

Looking forward to a favourable and considerate response.

Yours faithfully,

[REDACTED]

FURTHER SUBMISSION ON STATE SIGNIFICANT PRECINCT – BLACKWATTLE BAY

GLOBAL COMMENTS

1. Greater Sydney Commission and Planning Excellence

In one of the documents that I read when reviewing the *Blackwattle Bay State Significant Precinct Study*, I noted the concerns that the Greater Sydney Commission's concerns about the complexity of planning in the Blackwattle Bay area.

No-one can deny the amount of planning studies that the Pymont Peninsula has been subjected to. Unfortunately, I cannot believe that this most recent study would assuage the Commission's concerns. This study is perhaps the most repetitious, poorly structured/written, and hard to read document that I have had the displeasure of reading. Rather than a true planning study it is more of list of acronyms, tables and references to other studies and planning documents and what they require rather than advancing planning for the site and Pymont Peninsula and garnering support.

It also occurs to me that the report was developed to accord with the principles of the Yes Minister/Prime Minister TV series:

1. Get Rid of the Problem in the Title
 - this Study is not about Blackwattle Bay but less than 50% of it
: only the portion you WANT to include in the Study
2. Is it the right weight? The report is
 - poorly structured, the report hides important comment deep in the document.
 - unbelievably repetitive and more a list of requirements from other documents and statements about "that" it responds rather than actually responding.
 - filled with numerous figures missing codes and which should have been amalgamated
 - missing all the documents frequently referred to as attachments, the contents of which should have been discussed properly in the report.

Having struggled through the report I am left with the impression that the report is intended to bore and confuse the reader to limit legitimate and reasoned response.

The number of times that the document refers to the need for future studies and decisions clearly makes it an inadequate report on which to move forward.

The report also repeatedly refers to the need for planning excellence. I have difficulty in accepting that this report represents "excellence" in any form. Just saying the words does not make it so.

2. The Precinct and Place-Based Planning

All sites or precincts exist within something of a higher order. As I commented in my submission on the new Sydney Fish market, that study sought to avoid significant issues by limiting the extent of the geographic space under consideration and sidelining the impact of that area on the surrounding. While this study report refers to the surrounding areas its treatment of them is inadequate and seems to adopt a "not our responsibility" and "somebody will look at that later" approach. How can that be planning excellence if a site is planned before its impacts on the surrounding area is known. For example, it takes 148 pages to acknowledge that further study of utilities such as water, sewerage, electricity and gas in the Pymont Peninsula is required and 154 pages to acknowledge that a Pymont Infrastructure Study is required yet seeks to develop the Blackwattle Bay Precinct as narrowly defined in advance. It is unsurprising that the Pymont community is not supportive and lacks confidence.

Rather, the Blackwattle Bay study, is myopic and essentially deals with the old Fish market site and the Bank Street foreshore – although that part of the site is primarily dependant on "future" decisions. Is this really good enough for a site of such significance and reflective of planning excellence?

My other general comments on the site are that it:

- ***Fails to address the gateway to the Bay – Glebe Island Bridge.*** This heritage item is too important to be largely ignored in a plan for Blackwattle Bay. Surely it cannot be planning excellence to deliberately ignore/defer this important but decaying heritage item to future decisions. Then, suddenly at p 134 there is an alarming statement slipped in that talks about “construction of a “new crossing” between Glebe Island and Pyrmont that “could support walking cycling and public transport”. What does this mean for the existing and much-loved Glebe Island Bridge and, if this structure or a new one is recommended it would totally change the need to funnel cycling and public transport through Pyrmont as the harbour foreshore would be a far more logical and acceptable route. This needs to be decided before the Blackwattle Bay infrastructure is constructed.
- Fails to properly deal with the roads and traffic issues that border the site. Decisions on major roads bounding the site need to be agreed before planning for the site is finalised.
- Fails to deal adequately deal with utilities infrastructure (water, sewerage, gas and electricity capacities) are properly assessed and, where necessary upgraded. Having only recently recovered from the disruption caused by the Darling Harbour redevelopment, residents of Pyrmont are rightfully concerned about future severe disruption while not only building works at Blackwattle Bay are undertaken but also a major upgrade of water and sewerage from the southern end of the Peninsula are upgraded/replaced.
- Treats surrounding areas of Pyrmont, Ultimo and Glebe differently with Pyrmont being the big loser when it comes to issues such and noise and solar impacts and the impacts being hidden and only fleetingly discussed in the latter parts of Study.
- Conflicts with previous studies such as the Pyrmont Peninsula and transport studies (the latter talking about closing and narrowing roads in Pyrmont and this study speaking about opening and widening them.
- Defines out the western foreshore of the Bay just as it does the bordering roads. I note the consultation with the Sydney College (owned and controlled by the State Government but if I was a resident of Glebe, I would fear that “Glebe is next”.
- Caves-in the commercial interests to the north of the current Fish market site including, but especially the Hymix site which is simply not congruent with the aims of the Study. Anyone who currently lives in the Miller Street area would be aware just how much concrete dust this facility spreads over the neighbouring areas. Its 24-hour operation also creates a lot of noise from trucks at night as well as its trucks being one of the major transport problems in the locality. Just because Hymix say its facility is essential does not mean it is so – it probably isn’t. It must go before the old Fish market site is redeveloped. Even the study indicates the problems it will create for the site let alone the surrounding areas.

All “private land-used, if advised now should have plenty of time to relocate before the mid 2020s and the sites then compulsorily resumed as they are inconsistent with not only the site but surrounding residential areas.

3. The World has Changed Irrevocably – Catch Up!

While I note the numerous planning studies that have been conducted in the past and their predictions of housing, commercial space, and employment needs, are used, COVID has rendered these studies out of date.

Working from home is now a fact of life and it is highly unlikely former “office-based” will return. Work will return to anything like previous levels. Health Directions also inhibit the number of workers who can occupy any space and the demand for apartment living weakened. We will not be going back to previous models and your demands should be revised to reflect this and recognise the excess of space that now exists in the CBD. There are already

predictions of a glut of office space in the CBD and retail shops there are in desperate need of additional city workers. Building office space in Blackwattle Bay will only exacerbate that problem and should be reconsidered. It is highly likely that a lot of the “Innovation Corridor” requirements can be satisfied without Blackwattle Bay.

Similarly, apartment and inner-city living has lost a lot of its attraction as working from both home and moving to regional areas has been both feasible and desirable. Your arguments about “affordable housing are also badly diminished by your acknowledgement that only 1.7% of the residential floorspace on the site will be for that purpose (as opposed to 5-10% across Greater Sydney), your failure to identify where that will be and your arguments that it should not be mixed with medium and high-end housing. Essentially, therefore you are proposing a waterfront development for the rich.

4. Impact on Pyrmont

Throughout your report you downplay the impact of your proposals on the existing community of Pyrmont. Glebe and Ultimo feature far more prominently in your report than does Pyrmont and your proposals frequently conflict with previous studies. Ultimately, buried deep in the document, you admit that further work is required to properly understand the impact of the proposals on Pyrmont – a clear indication that the site area is considered more important than the remainder of the suburb.

Pyrmont residents are not opposed to development, but it needs to be appropriate development. We know that the Star tower proposal is not dead, and fear being squeezed into a sunless valley with the Star blocking our morning sun and Blackwattle Bay our afternoon sun. Leaving development approvals in the control of a Minister or a Departmental Secretary simply adds to that concern and mistrust.

5. Attachments

The Study refers to 41 Attachments stating that information can be found in them – it isn’t provided in the document under review.

However, the Attachments are not provided nor are there links to them? Why is that?

DETAILED COMMENTS ON THE STUDY/REPORT’S CONTENTS

Page	Issue	Comment
xi - xiii	Increase international visitor length of stay and expenditure	Wording reveals the truth about the proposed development as an adjunct to The Star and an as a “cash-cow for the NSW Government
xiv	Precinct Plan - comprehensive urban design visions and strategy	This is highly debatable. A comprehensive Plan would properly cover all of Blackwattle Bay not just select parts and even the Study show much planning is yet to be undertaken.
xv	Extension of Miller Street	The Study exhorts the through site roads and lanes but ignores the reality of the problems that the current Fish market creates for Miller and adjacent street. The plans for the street and laneways will add problems for surrounding areas Pyrmont does not improve the problems there. You even admit that the transport modal mix that you are espousing is aspirational and will be difficult to achieve. Referring to extending Miller Street Saunders Street as providing vistas is also grandiose.
xiv	Glebe Island Bridge	Based on the report the old Glebe Island Bridge is THE MOST SIGNIFICANT heritage item (European or First Nations) in the vicinity. I cannot believe that a planning body claiming “planning excellence” in place-based planning could leave the gateway to Blackwattle Bay out of the Study. The Study is monotonous about the much trumpeted “world class Fish market that will be erected at the head of the Bay. Yest the Study

		<p>cannot even bring itself to admit that the Glebe Island Bridge, the most important and much-loved heritage feature in the Pyrmont landscape actually exists. and lies rotting. It is not only “planned out” of the Blackwattle Study, it is referred to in Figure ES2 as “Future Connection to Glebe Island”. WHAT! How can a planning authority that touts itself as delivering planning excellence leave a small sliver between 1-3 Bank Street and Evolve as unresolved in this Study? Sham eon you!</p> <p>Then, buried incredibly deep in the Study at Page 135 the Study states <i>The construction of a new crossing between Glebe Island and Pyrmont could support new walking, cycling and public transport links.</i></p> <p>This is extremely worrying to Pyrmont residents concerned about our heritage and would lead us to believe that the existing bridge is going to be left to rot until cannot be salvaged and is replaced by a new structure. This cannot be allowed to happen.</p> <p>Further, as hinted at in the report a Glebe Island connection could allow a huge volume of pedestrian and cycle movements (but perhaps not public transport) to be diverted out of residential Pyrmont and onto the harbour foreshore.</p> <p>This matter should be resolved before development of Blackwattle Bay is commenced and cannot wait for planning of Glebe Island to be undertaken and agreed.</p>
Xvi	138,000 sqm of space for employment.	For the reasons mentioned above, I believe this is now excessive and should be downsized significantly.
Xvii	16 Principles	I would contend that the Study fails against Principles 5,6,11, 13 and 16 and, as such fails the test of design excellence.
9	Precinct Plan	<p>The Study states <i>The current planning framework applying to Blackwattle Bay is complex, with controls contained within several different planning instruments. This is inconsistent with planning best practice and will not facilitate the realisation of the vision for a renewed Blackwattle Bay.</i></p> <p><i>The Blackwattle Bay SSP Study outcomes will establish a new planning framework to guide the future land uses, design and development of buildings and public domain in the Precinct.</i></p> <p>That may be the authors’ view. Put simply I do not accept it. For reasons I have explained above and below I believe that the Plan is inadequate and not a sufficient basis on which to proceed.</p>
9	9 Project Objectives	To my mind the Study fails Objectives 4, 5 and 6.
9	A2.4 Project Governance	I am opposed to the proposed Governance model which completely lacks local representation. It needs to be broadened to obtain community input because State Government agencies clearly do not understand/accept Pyrmont community views.
10	Study Key Principles	This is the clearest example (as if one was needed) that there is no interest in the existing residents and businesses (except perhaps The Star) of Pyrmont. Please remember that the future of casinos in Australia and Sydney and Melbourne in particular is now under a serious cloud.
21	Privately Owned Lands	<p>Does Hymix ACTUALLY own their site??? I recall being horrified some years ago at seeing media that their “lease” had been extended by 50 years.</p> <p>Either way:</p>

		<p>1. I would question that any site that relies all raw materials to be trucked in is essential (maybe the output is but it could be delivered from elsewhere just as when the Hanson's facility on the new fish market site has been</p> <p>2. The report clearly indicates that the facility is inconsistent with the proposed development but fails to acknowledge both the adverse noise and cement dust problems that the site creates for surrounding areas of Pyrmont.</p> <p>3. Of course Hymix will argue that the site is essential but that does not make it true. If Hymix were given its marching orders now they would be able to relocate before the new Fish market is opened.</p> <p>For similar reasons, I cannot see why other privately-owned lands facilities could not be successfully relocated with three years notice.</p>
23	B3.6 Other Uses	<p>This discussion is not consistent with latter information which describes 1-3 Bank Street as a local heritage item.</p> <p>There is also no clear indication of what is proposed for the "new temporary 5-year maritime facility" and the Dragon Boats storage. Relocation of the dragon Boats is never discussed.</p>
27	Gradients	<p><i>The gradients along some footpaths on routes towards public transport stops and major transport hubs (Town Hall and Central stations) are steep. Are you serious? Have you even walked them?</i></p>
28	Light Rail	<p>Figure 11 – are you not aware of the John Street Light Rail stop or do you just not want to admit to its existence?</p>
29	Parking	<p>This is a clear example of the authors' myopic approach to planning. The statements are ignorant in that they deal only with "on-site" parking and ignore the "off-site" parking volumes and issues created by the infestation of small buses from The Star and the Western Suburbs that are not catered for in either the old or new Fish markets. Drivers have, in the past told us that the Council allows them to park contrary to street signs. We have observed Council Rangers walk past/ignore illegally parked vehicles in the past and have no confidence that this will not occur in the future.</p>
30	Heritage	<p><i>"There are no heritage items of local significance in the Blackwattle Bay Study Area".</i></p> <p>Clearly defining out the Glebe Island Bridge and the assists this argument as does the Kauri Foreshores Hotel that support my arguments about the site definition. However, the Study a lot later mentions the local heritage importance of the buildings on 1-3 Bank Street – so much for planning excellence. Also excluded seem to be the two on-site parcels of Aboriginal peoples' heritage and the in-cliff cave shelter at Jacksons Landing.</p>
37	5 Big Moves	<p>It could be reasonably argued that Pyrmont residents are not interested/in favour of Big Moves 2 and 3. Neither of which have benefit to us.</p> <p>It is also of interest that none of the 5 Big Moves mention housing or work – two of the big principles allegedly underpinning the study.</p>
54	Minister may waive requirement for a master plan	<p>If the Blackwattle Bay site is as significant as claimed, how can it be argued that development of a Master Plan is unwarranted. Doing this is tantamount to stifling legitimate and important debate and should be strongly criticised.</p>
55	SLEP Heights	<p>Figure 24 is intentionally confusing in that the heights indicated do not indicate whether they are metres or floors.</p>
62-64	Reconnecting The Bay To Its Surrounds	<p>The naming of the street and lanes (e.g. Gipps) is not explained as to its connection with Pyrmont.</p>

		<p>Further, the extension of streets such as Miller and Saunders seem to have far more to with movement through the site than connecting the neighbouring areas of Pymont. In fact, connecting Miller and Saunders Streets to the foreshore are likely to increase difficulties for the residents of those streets.</p> <p>The recently installed cycleway in Miller Street is a failure (most cyclists use the newly narrowed roadway instead of the cycleway) and hated by many residents because of the problems it has created.</p>
64	Community Consultation	As evidence by the statements in the Study, the community consultation has not been with residents but with bodies that might be expected to support development proposals – it is “fake” consultation
71	Hymix	I view the comments here as an ambit defensive position by Hymix that could not be reasonably sustained. The Hanson’s plant was removed for the new Fish market and despite pressure by Hanson’s it was not relocated to Glebe Island. Pressure by Hymix to remain should be similarly refuted.
73	Building Heights	<p>While a majority of people may have opted for Scenario 2 that does not mean that we like it. It is akin to being asked how you want to be executed – being electrocuted, being hot or having your head removed.</p> <p>None of the three scenarios are acceptable to most Pymont residents that I have spoken to who all believe that the heights of the buildings are excessive and that they will result in significant afternoon shadowing for significant parts of Pymont village.</p> <p>The study deals with avoiding morning shadowing of Glebe and Wentworth Park but remains silent when it comes to Pymont.</p> <p>If ever The Star Tower is built, we could be in shadow in both the morning and afternoon especially in winter.</p>
75	First Nations Culture	Is this it? Is this all you could come up with despite First Nations supposedly being a significant component of your philosophy?
81	Roads	<p>The current Gipps Street Pymont terminates on the Eastern side of Harris Street Pymont and there appears no intention to extend it to the current Fish market site. Why then are streets in project area being called Gipps Street and Gipps Street and Gipps Lane – just as the bisected Jones Street does. Also why is the nomenclature European and not based on Aboriginal words?</p> <p>I also strongly oppose any road system on the site than promotes vehicles from the site moving through or seeking parking in the residential streets of the remainder of Pymont.</p>
85	Proposed Road Hierarchy	Figure 33 shows Miller Street as a ‘Major Road’. This is both unreasonable and unacceptable to Miller Street residents. Our street has always been a busy and heavily used road and is often a bottleneck in the weekday afternoon. The recent addition of the cycleway has reduced its carrying capacity and increased the danger for accidents between bicycle and vehicular traffic. It does not have the capacity to carry additional traffic generated by the proposed Blackwattle Bay development. Through traffic should instead be funnelled onto the largely not residential Pymont Bridge Road.
86	Development sensitive to adjacent development.	<p>This is not correct. Your report concentrates on open space and sun planes for Glebe Foreshore, Sydney Secondary College and Wentworth Park. It totally ignores afternoon sun planes for Pymont Village which will be completely overshadowed in the afternoon. This is unacceptable.</p> <p>For the study to justify building heights on mirroring those on Distillery Hill is also laughable. Those building are constructed on a far higher elevation, and far less floor and create far less afternoon shadowing than will those proposed for Blackwattle Bay.</p>

		<p>As well as shadowing the existing residential areas of Pymont Village the proposed building will also cause a loss of both views and privacy for existing dwellings.</p> <p>Yet again I must object to the myopic views expressed in the report about the need for appropriate sun-planes on site but total disregard for the sun-planes of Pymont Village.</p>
88	138,000sqm employment floor space	As stated elsewhere, I do not accept that this minimum can be justified in the posit COVID environment especially when there is so much concern for excess floor space in the nearby CBD.
93	Maximum Building Heights	<p><i>The proposed maximum heights will ensure that appropriate solar access protection is afforded to existing and new open spaces.</i></p> <p>This is another clear example of how myopic the authors are. Your concern is for the site and totally ignore the impact of your proposals on Pymont Village. How can this possibly be “planning excellence”?</p>
94	Affordable Housing	Your admission that only 1.7% of residential space in the development will be for affordable housing compared with 5-10% across Greater Sydney makes a mockery of the other statements in the Study proudly espousing a mix of housing types. This is further evidenced by the fact that you argue for sperate buildings for affordable housing but do not indicate where that will be. No doubt you are intending that they be in the area of the Western Distributor that you have already stated will suffer noise issues.
110-112		DCP 2012 requirements and the shadowing overlay map on p 111 clearly demonstrate the callous disregard that this Study shows for Pymont and its residents. The study constantly looks West and never East unless it is to solve an on-site problem.
119-120	Indicative Staging Plan	This Plan is extremely disappointing and will compromise the success of any development on the Fish market site for many years. It is a sell-out to commercial interests and clearly indicates that the Study is all about getting maximum economic benefit out of the current Fish market site and that anything else is peripheral and of little, no interest.
122	Promenade Width	Again, choice of Option 3 promenade width demonstrates: 1.the desire to squeeze as much money as possible out of the site and forsaking public open space for extra building space. 2. Caving into the commercial interests in Development Zone 8
125	Figure 55	Ignores the Light Rail Stop at John Street Square which would be an important access link for the northern p[at of the site.
126	Glebe Island Bridge	The statements at p126 are cursory and do not satisfy the requirement of SR3.6 to identify “how” the plan connects to the former Glebe Island Bridge as a possible future active transport connection to the Bays. Planning access to and through the site and ignore the significant opportunities offered by a future transport link that could significantly alter the situation cannot be “planning excellence”.
133	SR4.13 Noise & Acoustic Compatibility	<p>Your Study shows that the Hymix facility is not compatible with the proposed land uses – even ignoring the dust that Hymix creates yet the building planning studies show that proposed buildings are intended to be constructed so as to minimise the problem. Surely this is not acceptable. The Hymix site is a problem already for existing local residents from noise, dust and transport perspectives and will become even more of an issue when the current Fish market site is redeveloped.</p> <p>Hymix’s assertions that the facility is essential need to be seriously tested. I do not believe them. Hanson’s relocated to allow the new Fish market and construction in Sydney survived. The same would happen if the Hymix facility was forced elsewhere.</p>

182476

[redacted]

glebe

My regret I had an It fail so this is only an early draft and rather unpolished.

In Summary:

A fish themed food hall is no justification for alienating part of the harbour.

The proposal should be rejected until it addresses all the impacts. Fobbing them off to some mythical "other" s poor planning.

I object to the proposal on the grounds that:

The exhibition has been insufficiently documented.

There has been no consideration of alternatives.

The proposed development does not justify changing the planning rules as they stand.

Insufficient exhibition

The state government is owner, developer and decision maker. This is a massive conflict of interest that would be illegal in any other circumstance. Genuine openness is essential to the creditability of the process. That work has started in the bay does not give me any confidence that this is a genuine consultation. Yet the documentation is minimal. Merely puff pieces to extol the best financial outcome. There are references to documents but they are not available.

For example where are the shadow diagrams? These are massive buildings that will throw long shadows all day long. Bridge road will become a concrete canyon, overshadowed all day long. There are lots of pretty pictures of how it will look from a helicopter over the water. Where are the images at street level from the aspect of the thousands that pass each day?

The documents say 1550 new dwellings will house 2800 new people. That is only 1.8 residents per dwelling. This seems low. Other priority precincts have recognized an average 2.6 persons per dwelling. This is not a statistical novelty. It will lead to dramatic undersupply of facilities.

The proposal fails to consider how public facilities will be delivered. There is a generally accepted standard of 28 square meters of **open space** per person. This translates to a demand for 15 Ha of open space. Where will that be found? This is a planning proposal – demand that do some planning, don't fob it off to some mythical "other". Your literature includes an aerial picture of the fish market site. Also in the picture are 4 brown blobs. These are sports fields that have been used, abused until they became bogs. There is an existing shortage of sports fields. The development of Jacksons Landing has injected thousands of people but where are the sports fields? Glebe has suffered multiple small rezonings, where is the new open space, community buildings or traffic improvements? Adding this development just makes it worse.

Where is the Voluntary Planning Agreement? The land owner will get a massive value uplift why not share that with the community that will be burdened. Putting this off to the builders is not reasonable. They will bleat about 'feasibility' and demand even more planning concessions.

Sharing the value uplift is essential because:

1. Development creates demand for services such as open space, community buildings, roads, and paths. How are these to be funded if the value uplift disappears into profit? Sections 7.11 and 7.12 of the EP&A Act generate some money but these have been capped for more than a decade. When the cap was put in place these contributions represented 4% of an average house price. Now they are around 2%. Meanwhile the cost of providing facilities has risen steadily. The cost of land acquisitions has doubled. Value uplift should at least compensate for the deficiency.
2. Development imposes costs that are difficult to price. The development might pay for a traffic light, but who pays for my time and petrol when I stand at a red light. If the street

trees are stunted or die will the development replace them? Where is the compensation for congestion not just adjoining the development but further away? Traffic does not just evaporate once it leaves the gate.

3. Value capture puts a dollar value on the burdens the development creates. If a project is not feasible when sharing value uplift then it is not feasible and should not be built.
4. The community owns the airspace. If a developer wants a bigger site horizontally he expects to pay for it. But if he goes up he expects it for free. There is no incentive to comply with planning rules when you can get a bigger site for free.

Affordable Housing

The proposal offers 5% affordable housing. This is disingenuous as it is dependent on concessions on other contributions. There is no merit in promising something someone else pays for.

It is also not enough. 5% represents about 78 dwellings, yet the retail component will generate some 5,000 low paid jobs in food service or retail who will need affordable housing. The residential will also generate demand. People who can afford a multi-million dollar apartment don't clean their own toilet. Don't be surprised if the final design included micro apartments with a view to the freeway. These are for the maid/cook/driver. We should not be cutting contributions for open space, community buildings or transport so that the rich can have their servants nearby 24/7.

The documents speak of releasing 6,000 meters of **water front**. This is a lie. Much of this frontage is free now, except for that spite fence they put up. The fish market design includes 2 bays at either end. These will discourage passing through the retail precinct – pushing people and bikes onto the Bridge Road footpath. Claiming credit for merely replacing what has been taken has no merit.

Consideration of alternatives

The proposal assumes that we need a new market and that it has to be here. This is not correct. At one community consultation I was told the existing market was built in an old printery. This is a lie. I watched it being built. It is a purpose built facility, with a refrigerated floor, bidder grandstand and material handling facilities. It is relatively new and does not need replacing. They also say the market is a tourist attraction. This too is a lie. To see the wholesale market in action you need to get up at 4 am and have booked a tour. The market is finished long before most tourists get out of bed. The Elton study found only 6% of respondents wanted to do a tour. The retail component is disgusting; rusty ironwork, mouldy umbrellas, potholed car park, garbage stored in public spaces and bird droppings everywhere. This does not mean they should be handed part of the harbour to despoil. If they cannot manage the site they have don't give them a bigger one. The proposal is not a fish market it is a food hall. How does a food hall justify taking part of the harbour.

No consideration is given to alternative uses. No consideration is given to the value of the shoreline. SREPP Sydney Harbour recognises the value of preserving views from and to the shoreline. Putting a 28 meter high concrete monolith between the people and the views is in breach of the SREPP. The brochure says this development will release the shorefront – this is a lie. The shorefront is available

now (except for that spite fence they have put up). At present there are views from the water to the row of trees along bridge road. How does concrete and glass improve that?

All of the public land should be reserved to address the open space shortfall already experienced by past bad decisions.

Built Form

If you look at any great waterfront city you see heights that step up away from the water's edge. Even the much hated Barrangaroo has a sleeve of low rise and a wide promenade. This proposal will overshadow and overbear the public spaces. It steals water views and natural light from the neighbours. The height limits proposed are neither explained nor justified. Making landowners rich is not a planning result.

The site

There is no site. The proposal is fully 'over water'. Elton says 68% liked the design. But this is not about design. It is about land use. Liking the design does not mean we want to sell off the harbour for a food hall. The community consultation does not provide any support for the harbour sell off. When Crown Casinos wanted part of the harbour for their casino the Sydney community said no. Recently there was a proposal for an 'Amalfi club' to be temporarily set up on a small part of Bondi Beach again the community said no. There is no community support for a harbour sell off.

And there is no need. The existing market has a substantial single level car park that could be redeveloped. No need to sell off the harbour. No need to do expensive over water construction and it is right by its own station.

Summary

The provision of a fish themed food hall is not justification enough to permanently alienate the waterfront.

The proposal must be rejected until all the impacts have been addressed.

182636

[redacted]

ANNANDALE 2038

20 August 2021

Infrastructure NSW

AON Tower, Level 27, 201 Kent Street,
Sydney NSW 2000

Nik Brcin

19 Trafalgar Street
Annandale NSW 2038

Dear Infrastructure NSW,

Thank you for the opportunity to comment on the State Significant Precinct (SSP) Study and proposed planning controls for the precinct of Blackwattle Bay including the redevelopment of the Sydney Fish Market Site and the reclamation of Blackwattle Bay.

As part of the Infrastructure NSW request for feedback I am writing to strongly object to the State Significant Precinct (SSP) Study and proposed planning controls. My reasons for objection include but are not limited to:

- The State Significant Precinct Study does not include a detailed Business Case to quantify the public benefit;
- The State Significant Precinct Study does not confirm how the proposed developments will meet Australia's 2030 Emission Reduction Target and other legal frameworks related to the climate crisis;
- The State Significant Precinct Study should not reclaim Blackwattle Bay;
- The State Significant Precinct Study does not provide for a publicly owned foreshore;
- The State Significant Precinct Study does not sufficiently address pedestrian and road safety along across the existing street network and public space;

- The State Significant Precinct Study proposes a building mass that is out of scale in height and bulk with the current and future desired character of the area;
- The State Significant Precinct Study proposes building designs that will create excessive shadows and loss of daylight to public space; and
- The State Significant Precinct Study will have a detrimental impact on the provision of public space for the residents of the City of Sydney and Inner West Council.

Should Infrastructure NSW wish to discuss any items further, please do not hesitate to contact me.

Kind regards,



20 August 2021

Infrastructure NSW
AON Tower, Level 27, 201 Kent Street,
Sydney NSW 2000

██████████
████████████████████
Annandale NSW 2038

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- The State Significant Precinct Study will have a detrimental impact on the provision of public space for the residents of the City of Sydney and Inner West Council.

Should Infrastructure NSW wish to discuss any items further, please do not hesitate to contact me.

Kind regards,

██████████

182671

[redacted]

2035

File attached re concerns over the development

Blackwattle Bay Development Proposal

The best planning outcomes occur when the public can provide input and when decisions are made by those who represent the affected communities and I am very concerned with the Blackwater Bay development proposals. The scale and mass of the building envelopes are excessive, both in relation to the Pyrmont peninsula and to the low scale of Glebe on the western side of the Bay.

The NSW Government planning department refers to good 'place making principles' yet this proposed development ignores these principles by not responding to the existing character and scale of the area.

Below are the concerns I have regarding this development proposal.

I list specific concerns as follows:

- 1. Concern that the mass of the building envelopes are excessive in relation to the Pyrmont peninsula and to the low scale of Glebe on the western side of the Bay.**

The proposal to allow 12 building envelopes, each of up to 45 storeys high, along the waterfront will create a wall of development, blocking the harbour from the rest of Pyrmont. This is higher than any other building west of Pyrmont Bridge at Darling Harbour. Please note that community surveys indicated that 92% surveyed felt that any new built form in the area should reflect the low-rise character of the Glebe and Pyrmont areas.

Development of buildings of this height and in this narrow space will visually dominate Blackwattle Bay, and result in the obstruction of views and vistas to and from the Pyrmont Peninsula, and create a wall of buildings that will alter the perception of the urban morphology and the remnant historic cultural landscape.

2. **The development ignores** good ‘placemaking principles’ and is not in keeping with the existing character and scale of the area.

Placemaking aims to build on existing character, meaning and identity – something that Pyrmont and adjacent Glebe have in abundance.

Any changes in building forms and public domain must be sympathetic to, or enhance, that character, rather than dominate the landscape.

A building of 45-51 storeys does not complement the Pyrmont Peninsula heritage character, or the overall low to medium rise character across the peninsula and nearby Glebe (with the noted recent intrusions and exceptions at Jacksons Landing and Darling Harbour).

Pyrmont Peninsula’s major commercial, entertainment, residential and retail buildings sit comfortably with terrace housing, smaller shops and heritage areas. They benefit from the area’s proximity to the CBD but also the character and charm of surrounding buildings and public terrain.

3. Concern that heritage considerations have been completely sidelined.

Despite earlier heritage studies in relation to this area, the Blackwattle Bay State Significant Planning Study's Masterplanning Principles include ZERO reference to the existing heritage and character of the area. One such study, the Pyrmont Peninsula Place Strategy's Heritage Study (GML Heritage, 2020) recommended that new development on Pyrmont Peninsula should not dominate or compete with the horizontal landform of the peninsula, and that it should be respectful and consistent with the character of the area in terms of its scale, form, rhythm and materiality.

The Heritage Impact Statement for the SSP proposal fails to adequately assess the cumulative impact of the development on the peninsula's overall heritage value. There is also a failure to assess the impact on nearby heritage conservation areas, it does not address the impact of the tower height on the landmark values of the ANZAC Bridge.

4. Concern about significant overshadowing cast by the towers across Wentworth Park, the Bay itself and the public areas.

The towers will cast shadows along the proposed public domain including the public waterfront promenade, making it unpleasant, especially in winter. This is a poor approach to place-based planning and is not what our iconic harbour and Pyrmont deserve. Good design should locate any tall buildings in locations on the Peninsula that optimise solar access in public spaces, in particular places for public recreation and the foreshore.

The excessive building envelopes and heights result in excessive shadowing of the bay and the proposed public spaces. Mornings are a key time for water sports on Blackwattle Bay, harbourside walks, and visits to the fish markets. Having towers that throw these areas into shadow is

bad urban design.

5. Concern that Sydney City Council will not be the determining authority

The best planning outcomes come when the public can provide input and these are made when planning decisions are made by those who represent affected communities. There is a proposal to declare Blackwattle Bay a public authority precinct like Barangaroo and Darling Harbour which would enable the state government to design and deliver public domain areas and manage future use of the site outside normal transparent and accountable planning processes. This approach undermines the purpose of determining areas of state significance, risking social licence for major development.

Blackwattle Bay must be subject to local government planning and management to ensure all decisions are open, transparent and accountable, and reflect community input.

Regards,

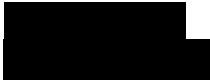


182706

[redacted]

Glebe 2037

I object to the Study and the Proposal for the reasons set out in the attached Submission dated 20 August 2021



Glebe,
NSW 2037

To:
Director, Eastern District (City of Sydney)
Re: Blackwattle Bay Submission
NSW Planning, Industry and Environment
Locked Bag 5022,
Parramatta, 2124
Email: eastern.harbourcity@planning.nsw.gov.au

Date: 20 August 2021

Submission

Re: Blackwattle Bay - The State Significant Precinct Study (the “Study”) and proposed planning controls for Revitalisation of Blackwattle Bay

I object to the planning control changes proposed by the Study and the Proposal referred to in Section F of the Study (the “**Proposal**”).

I do not want my name published.

I have not made any reportable political donations.

Preliminary Comments about the SSP Study Process

I would like to make some preliminary comments about the SSP Study.

Firstly, I find it arrogant and disrespectful to the community and all stakeholders that Infrastructure NSW is pressing on with this plan to overdevelop this small section of Pyrmont village as if it is part of the CBD or Barangaroo. This is despite for the almost universal objections to all 3 Scenarios proposed in the Revitalising Blackwattle Bay Brochure in 2020 (as acknowledged in Attachment 11 to the Study which summarises Community and Stakeholder feedback).

That 2020 brochure proposed 3 Scenarios, each of which proposed too many, too tall and too bulky podium buildings topped with too many, too tall towers with buildings up to 36 metres taller than the Anzac Bridge Pylons, standing shoulder-to-shoulder from Bridge Road to the Anzac Bridge. No lower height or less dense built form options consistent with the local area were proposed.

Despite some pretty outrageous push polling in the surveys used to feel out community preferences, Attachment 11 correctly identified **almost universal community opposition to the proposed building heights and density, a general feeling that all built form should reflect the existing built form of the local area, community demands for more and larger public greenspace and huge community concerns about the development adding to existing traffic congestion and parking problems.**

Despite this, Infrastructure NSW is pushing ahead with a proposal for a wall of towers (again with some 36 metres taller than the ANZAC Bridge Pylons) on top of huge shopping centre podiums that leave little more than a pathway for the public and a couple of token overshadowed parks and a fairy-tale proposal to solve the traffic congestion and parking shortages by a virtual ban on vehicles and a fantasy that everyone will use the, as yet unbuilt, unfunded and unconfirmed improved public transport, bike paths and walking paths.

Even the “missing link” promenade is a fake promise. It depends on private owners in the Precinct falling in with Infrastructure NSW plans and timeline. It is not guaranteed.

What is the point of Infrastructure NSW seeking community feedback if it is going to ignore it and the expert reports and merely pay lip service to having heard the community opposition but press ahead regardless with seeking to change the existing planning controls to permit buildings with bulk and scale essentially as proposed in those 3 Scenarios and which are clearly incompatible with the local area?

The Infrastructure NSW website states it is a development corporation established by the NSW Government to identify and then push public infrastructure. It is said to advise government, deliver projects and manage certain projects or precincts, such as Barangaroo, to ensure they are delivered on time and on budget. So, it is perhaps not surprising, with Barangaroo slowly creeping towards completion, that it is now looking for a new precinct to “manage” to justify its existence.

But I don't understand why the Department of Planning, Industry and Environment seems to be actively working with Infrastructure NSW to press ahead with such an inappropriate proposal.

The State Significant Development process is already on the nose with voters. It seems almost every project is now State Significant, removing them from the scrutiny of elected councils. The NSW Government can expect a revolt against the State Significant Development and State Significant Precinct loopholes and a strong push to return planning controls to locally elected Councils, particularly if it continues to ignore the local community.

The second point I'd like to make is, the Study is not transparent and is quite misleading.

On the Infrastructure NSW website it was impossible to find the Study and relevant supporting reports. I had to go to the Planning Portal where there is a link to the Study and to the Explanation of the Intended Effect (Attachment 10) but not to any of the other 41 Attachments. It was quite difficult to find any of the other Attachments as they are only accessible on the Planning Portal under a grey, non-bolded heading "View the Technical Studies" which does not appear to be a link and makes no mention of "Attachments" or the fact one may click on the heading. Did you not want us to find them?

Then it is not until page 78 of the Study that one can even find out what this new Proposal is. Talk about burying the lead.

I wanted to see the photomontages to see what the Proposal was about and whether the buildings in the 3 Scenarios had been reduced in bulk and scale. But the photomontages are extraordinarily difficult to find. Eventually I found a reference to them on Page 126 of Attachment 15 "The Visual Impact Assessment" as an Appendix B to that report but the Appendix was not attached. Again, did you not want us to find them?

The Visual Impact Assessment is probably the most important report to review but it was particularly unimpressive. There were meant to be 20 viewpoints, but I could only find 11. And even then, few of the 11 viewpoints selected were relevant. And many of the most relevant potential viewpoints were omitted entirely.

Rather than highlighting the bulk and scale of the built form and extent of visual impacts, the photomontages downplay the massive, inappropriate bulk and scale of the proposed buildings and their visual impact.

And the conclusions of the report are illogical. Despite finding many of the impacts to be HIGH, HIGH/MODERATE and MODERATE, the author finds a way to conclude the visual impacts would not hinder approval if certain, unspecified, "Alleviation" measures are taken.

As with many of the Attachments, this report shows all the signs of having been **over-workshopped by spin doctors** to the point it impacts on the logic, professional integrity and intellectual honesty of the report.

I comment further on the Visual Impact Assessment at point 4 below.

Thirdly, most of **the SSP Study looks like it has also been massaged by the spin doctors** to downplay, bury or remove any inconvenient outcomes. It is not a transparent, honest, professional, independent review of the Proposal.

Fourthly, the **volume of documents and length and complexity of each document referred to in the Study looks like they were prepared in such a way as to bury the facts** and daunt any layperson who may have wanted to lodge a submission. It reminds me of stories of tobacco companies in litigation who sent the plaintiff lawyers a warehouse full of documents in the hope the lawyers wouldn't find the damning evidence.

All in all, I found the Study to be non-transparent, unfair, intellectually dishonest and misleading.

I call on the Minister to reject the Study and the Proposal.

My Main Objections to the Study and the Proposal

The current Planning Controls should not be changed

There is a serious problem with the proposal to change the existing Planning Controls, at this time. It is too premature.

Infrastructure NSW is making a pre-emptive strike to change the Planning Controls now to ensure the community, the Independent Planning Commission (**IPC**) and other authorities will be powerless to rein in inappropriate future development applications for the Precinct.

When development applications were lodged in respect of the Star Casino and Harbourside Shopping Centre, the IPC was able to assess them on their merits and exercise independent judgement as to whether those applications should be granted or needed to be modified **BECAUSE OF THE EXISTING PLANNING CONTROLS**. But that will not be possible if Infrastructure NSW convinces the Minister to change the Planning Controls as proposed in the Study.

The community is not behind the Proposal and, as set out in point 5 below, there remain too many serious issues yet to be resolved in relation to the Proposal and the Precinct and too many solutions yet to be found for serious problems presented by the Proposal.

I call on the Minister to reject the Study and the Proposal and to decline to change the Planning Controls.

Failure to meet the goals of the Study

Although many of the stated principles and goals of the Study appear at first sight to be laudable, **this Proposal is not an example of good town planning** and is not a fair or genuine attempt to achieve those principles or goals. The goals can be achieved without massive podiums/street wall buildings and massive towers.

Sure, all the usual buzz words are sprinkled throughout the Study and supporting reports – *authentic, sustainable, vibrant, jobs hub, technology hub, export-oriented hub, innovation hub, revitalisation, active transport, connection, returning harbour to community, low emissions, missing link, inviting, unique, socially inclusive* etc., etc. - but this is mere smoke

and mirrors to disguise the obvious problems with this Proposal and the fact most of the goals cannot be guaranteed to be achieved.

Most locals I have spoken to strongly opposed all 3 Scenarios put forward in 2020. That opposition is well documented in Attachment 11 (the Revitalising Blackwattle Bay Community and Stakeholder Engagement Outcomes Report). The 3 Scenarios did not provide any real choice, were not considerate of the local community, did not even appear to genuinely seek to satisfy many of the principles set out in the 2020 Revitalising Blackwattle Bay Booklet and demonstrated poor town and urban planning. They each constituted over-development at a ridiculous scale and did not even consider any less dense solution as an option and would not be in the best interests of the health and amenity of the local community. This Proposal suffers from the same problems.

The real goal behind the Study is clearly for Infrastructure NSW to assist the NSW Government to extract maximum return from the sale of the public land in the Precinct with no regard for good town planning or the opinions, needs or best interests of the community and other stakeholders.

It is extremely disappointing the Department of Planning, Industry and Environment appears to be prepared to ignore its core planning responsibility and is enabling Infrastructure NSW to assist the NSW Government to exploit the Precinct by seeking pre-emptive changes to the Planning Controls to make it attractive to developers.

In the interests of the local community, the stakeholders, the tourist industry and the people of NSW a more skilful, thoughtful, respectful, integrated town planning solution is called for this Precinct and the whole Bays Precinct rather than this attempt at pre-emptive spot rezoning. There have already been too many projects pushed through in the Bays Precinct without an integrated Master Plan.

The Study raises more questions than it answers. It identifies, but glosses over, the many inherent difficulties with the Precinct and the Proposal. Rather than applying best practice town planning solutions, the Study objective seems to be to give legitimacy to this proposed overreach and to pull the wool over the eyes of the Department of Planning, Industry and Environment, the Minister, the community and other stakeholders so Infrastructure NSW can ram through its pre-emptive changes to the existing Planning Controls. If that happens then neither the community, the Land and Environment Court nor the IPC nor any other authority will be able to rein in the excesses of the developers in the Precinct.

Sure, Infrastructure NSW has done some surveys and consultation with the public, but the process was an obvious example of push polling and selective interpretation of answers. Even so, it had to admit **only 9%** of those surveyed **favoured buildings of 40 plus storeys** and **32% wanted 20 storeys or less**. But it still didn't reduce the number or size of the buildings but rather pushed ahead with this Proposal they claim to be 45 storeys, but **which is actually the equivalent of 53 residential storeys high - and 36 metres taller than the Anzac Bridge!** (see point 1 on page 8 below).

In short, the built form envisaged by the Proposal is far too tall, bulky and disrespectful of the needs and amenity of the current and future residents, workers, and visitors to the Precinct. And the green space proposed is woefully inadequate. This is not Barangaroo. And it is not the CBD.

Executive Summary of main problems with the Proposal

I will next summarise the specific problems with the Proposal that I have identified and then provide more detailed explanations of each of those problems below.

The Proposal suffers from the following problems:

1. **too many and too tall and bulky podiums and too many and too tall tower buildings** that would block the sky, dominate the skyline, dominate the largely low-rise, historic village of Pyrmont and dominate and overshadow the foreshore, the bay, the new Fish Markets and the Glebe foreshore.
(see *point 1* below for explanation)
2. **too dense built form covering too much of the Precinct** without sufficient open space between buildings and **the proposed podiums containing additional retail shops, restaurants and offices are superfluous.**
(see *point 2* below for explanation)
3. **too little public greenspace**, positioned in the wrong parts of the Precinct and too few and too narrow pathways/promenades are proposed **and too little solar access.**
(see *point 3* below for explanation)
4. no genuine consideration has been given to **the adverse visual impact of the too many and too tall and bulky podiums and the too many and too tall towers.**
(see *point 4* below for explanation)
5. **poor town planning solutions.** The Proposal is too focused on realising maximum value from Precinct.

A much less dense, thoughtful, integrated, best practice town and urban planning solution with more, better located open space with decent solar access is called for in the interests of the community, stakeholders and the people of NSW. The podiums should be discarded, and the towers limited to the height of the Western Distributor.

And too many important things are still up in the air and should be resolved before proceeding with any planning control changes.
(see *point 5* below for explanation)

6. **the planning is old thinking.** The Study and the Proposal do not recognise and respond to changes in how we will live, work and play in the future due to the Covid-

19 pandemic, working from home and the death of bricks and mortar retail due to internet shopping.

(see **point 6** below for explanation),

7. no genuine consideration has been given to the **many adverse effects on the community, tourists and visitors by the proposed gross overdevelopment** of the Precinct.
(see **point 7** below for explanation)
8. no genuine consideration has been given to **the effect of the view loss due to the impact of the Podiums and Towers on views of the Bay and the City skyline**.
(see **point 8** below for explanation)
9. no genuine consideration has been given to the **devastating effect of overshadowing** and no genuine consideration has been given to the devastating effect of the blocking of sunlight to Blackwattle Bay waterways, the promenades on the eastern and western sides of Blackwattle Bay, the promenade along Bridge Road and the deck and solar panels of the proposed new Sydney Fish Markets.
(see **point 9** below for explanation)
10. **the wrong type of housing is proposed**. The Proposal essentially envisages hotels and luxury apartments with water views for millionaires, whereas the real demand is for low-rise social housing and affordable housing.
(see **point 10** below for explanation)
11. **no realistic, achievable solution has been identified to solve the existing and future traffic congestion and parking problems**.
(see **point 11** below for explanation)
12. **the NSW Government has a serious conflict of interest** being both vendor of the largest part of the Precinct and the entity seeking to set the development controls.
(see **point 12** below for explanation)
13. no consideration appears to have been given to **the danger of creating a precedent for overdevelopment on the shores of Sydney Harbour**.
(see **point 13** below for explanation), and

I will explain these problems in more detail below.

Explanation of Problems listed in the Executive Summary

Explanation of the specific problems with the Proposal (adopting the same numbering as in the Executive Summary).

1. **The Towers are too tall and there are too many of them and the Podiums/Street wall buildings are too tall, too bulky and there are too many of them and the Towers and Podiums are not appropriate for the area**

The Proposal closely resembles the Homes Scenario 1 in the 2020 Revitalising Blackwattle Bay booklet, at least as to the bulk and scale of the proposed built form and the open space being restricted to 30,000 square metres. So, no compromise by Infrastructure NSW. This is hard to justify given the almost universal opposition to the height and bulk of the built form of all 3 Scenarios put forward in 2020 and the community's demand for more green space.

The Study proposes 12 new buildings standing pretty well shoulder-to-shoulder from Bridge Road to the Anzac Bridge.

On Area 2 it proposes:

5 x 4 storey podium blocks with 4 x towers above of between 14 and 20 storeys.

On Area 3 (owned by the NSW Government being the old Fish Markets) it proposes:

2 x 4 storey buildings, and
5 x 8 storey street wall buildings (or podiums) on top of which will be built 3 towers of heights varying from 21 to 34 storeys.

But let's examine the heights of the buildings.

Referring to the heights of the Podiums and the Towers separately is an attempt to mislead. It is the combined heights of the podiums and the towers that is important.

And expressing the heights as "storeys" is also misleading because **podium heights are much taller than normal residential storeys.**

Looking first at **Area 2**: At first glance, it looks like the top of the **tallest tower** on Area 2 will be 24 residential storeys high. That is **WRONG. It will be 91.5 metres** tall (see **Note *1** below) which is **equivalent to 31 residential storeys** (given one storey of an average residential apartment building is approximately 2.94m high. That would be a **massive 73.5 metres taller than what the current zoning permits which is 18 metres** (see **Note *2** below).

Looking next at **Area 3** (the old Fish Markets): the top of the **two taller towers on Area 3** will not be 42 residential storeys high as the Study suggests. They **will be 156 metres tall** (see **Note*1** below) which is **equivalent to 53 residential storeys**. That would be a **massive 123 metres taller than what the current zoning permits which is 33 metres** (See **Note*2** below).

These two towers would also be 36 metres taller than the Anzac Bridge Pylons! So tall as to potentially interfere with aircraft movements!

Such tall buildings would be crazy on this relatively small Precinct on the edges of the village of Pyrmont, so close to the foreshore of Blackwattle Bay and hard up against the Western Distributor

*[Note *1 The proposed heights of buildings in the Proposal are shown by Fig 35 on page 87 of the Study.]*

*[Note *2 The maximum building heights for buildings under the current SLEP 2012 zoning are shown on Fig 24 on page 56 of the Study.]*

As to the proposed Built Form, in Attachment 3.2 Urban Design Statement Volume 2 the artist's impression of the Indicative Built Form on page 76 is shown from an aerial perspective. This is also misleading, as it tends to downplay the height, bulk and visual impact of the proposed built form.

However, in this case, what the aerial view also shows (probably unintentionally) is how ridiculously out of place such huge, tall, bulky buildings would be in the village of Pyrmont. **No similar height buildings can be seen within Cooe! of the Precinct because it has never been zoned for such huge towers.** You can also see this by referring to Figure 24 that shows the currently permitted building heights for the area. So, these proposed towers would be completely out of place.

Contrary to the artist's impressions the **towers would be too tall, too bulky and too close together such that they would block views of the CBD skyline and the sky itself and overshadow significant areas of the Precinct, Bridge Road, the new Fish Markets and its solar panels, the Bay and the Glebe foreshore.**

This will adversely impact the health, amenity and lives of the residents, workers and visitors in the Precinct and surrounding areas.

Now let's examine the bulk of the podiums/street wall buildings.

The Study proposes there be bulky podiums of 4 to 8 storeys under the towers. As I said earlier Podium levels are much taller than the height of a storey in a normal residential apartment building. This is because they are usually used as mall type shopping centres. Plus, the first 9 storeys of each tower are to be used for unspecified non-residential uses.

So, it seems **the Study proposes huge podiums, suitable for shopping malls or similar uses, to take up the bulk of the prime land in the Precinct,** most of which just so happens to be owned by the NSW Government. But has anyone asked whether the community wants or needs a huge shopping mall taking up rare waterfront land in the Precinct?

These shopping malls are totally unnecessary particularly given the recently approved massive shopping centre to be built by Mirvac on the old Harbourside Shopping Centre site, the proximity of the new Fish Market complex, the CBD,

Tramsheds, Star City and Broadway Shopping Centre. If there is a need for a few cafés and restaurants in the Precinct, they could be accommodated on the ground floors of the residential buildings without the need for more shopping malls.

And what of the approaches to the Iconic, State Heritage listed Anzac Bridge Pylons? **It would be a terrible result if the approaches to this impressive landmark Anzac Bridge are turned into dark canyons by bulky Podiums and massive towers.**

In summary:

- There are no similarly tall buildings in this part of Pyrmont.
- Such tall buildings are out of place in this part of Pyrmont.
- The visual bulk of the very tall buildings (37 to 53 storey high towers) when seen against the sky would be **oppressive**.
- **Such tall and bulky buildings will block solar access, block views, overshadow, lack human scale, dominate the skyline, fail to respond to the local character of Pyrmont and be oppressive to the very community to which good town planning is meant to respond.**
- The podiums/street wall buildings and towers should be deleted and replaced with much lower residential accommodation.

I set out at point 5 below, a much more appropriate town planning solution, similar to what exists on the western side of Blackwattle Bay, which works very well.

2. Proposed Built Form is too dense and covers too much of the Precinct

The Proposal shows multiple towers standing on top of bulky podiums across most of the Precinct leaving little space between them.

No less dense built form options have been offered as alternatives.

Rather than returning the foreshore to the community this Proposal would hand this prime waterfront land to private developers, hoteliers and shopping centre owners and the multi-millionaire apartment owners. This would turn the waterfront into nothing more than **another cold, windy, soulless, shopping mall precinct with privately owned shops, restaurants and businesses taking up prime foreshore space with the public relegated to little more than a narrow path in the shadows of the podiums, towers, Anzac Bridge Pylons and Western Distributor.**

The Pyrmont area is already well-serviced by multiple retail and hospitality venues and, due to Covid-19 driven changes (see **points 5 and 6** below), the popularity of internet shopping, the “work from home” model and the challenging economic times ahead there will likely be falling demand for additional office, retail or restaurant

space. So, it is likely the bulky Podiums and first 9 non-residential storeys of the towers will become white elephants.

The proposed building envelopes are excessive in height, bulk and scale, cover too much of the Precinct, lack human scale, would be overly dominating and intimidating, do not relate to the character of the local area and are inconsistent with the height, bulk and scale of buildings in the surrounding area.

Photos of Barangaroo are scattered through the Study, leading one to believe Barangaroo is the inspiration for this Study. It would be a betrayal of the Pymont community and a wasted opportunity to try to replicate Barangaroo on this Precinct. Barangaroo is part of the CBD and has been overdeveloped to the point it is a soulless, concrete jungle which is not pleasant to visit for locals or tourists. This is to the detriment of the community and the struggling retail and hospitality venues which seem to only be busy on Friday and Saturday nights.

I suggest the footprint of the buildings in the Precinct be halved, the height of all the buildings be massively reduced to no higher than the adjoining Western Distributor, the Podiums be deleted entirely and the public greenspace and width of the public foreshore promenade greatly increased (see the alternative town planning solution at point 5 below).

3. Too little public greenspace and too little solar access

The Study states only 30,000 m² (allegedly 30 % of the Precinct) is set aside for open space. I assume that includes all the new roads, driveways, paths, promenade, access ways, gardens and open space of the multiple private apartment towers and shopping centre and commercial/office podiums. So, in the final **analysis I very much doubt the open green space usable by the public will be 30% of the Precinct.**

Another way of looking at it is **70% of this largely public land is to be sold off to private interests (shopping centre operators, hoteliers and developers)** who will be allowed to build huge, inappropriate buildings that will monster and overshadow the waterways and the existing and new open space.

And the Development Applications will probably seek to exceed the Proposal on the basis they are State Significant Developments.

It appears from the Study that only token **small parks** will be dedicated to the public, poked here and there into any spare space not occupied by buildings or poked under the Western Distributor and between pylons. Nothing of the scale of a proper park like Jubilee Park, Federal Park, Bicentennial Park, Waterfront Park or Wentworth Park is proposed.

Much of the public **open space proposed will be under or in the shadow of the Western Distributor, the approaches to the Anzac Bridge, the Pylons of the Anzac**

Bridge, the podiums/street wall buildings and towers. It is certainly nothing like the generous, open, sunlit parkland on the western side of Blackwattle Bay.

It would be an opportunity lost forever if only 30,000 m² of the Precinct was dedicated to public greenspace.

Lip service is paid in the Study to returning the Precinct to the community but that will be of little use if there is inadequate publicly accessible greenspace with solar access.

Rather than returning the foreshore to the community what is really proposed is to hand it over to developers, hoteliers and shopping mall owners. What the community is offered is **a path, some of which will only be 10 metres wide, which one day might be built if the owners of private lots in the Precinct co-operate.** This path will be **in shadow.** The path will wind through the Precinct connecting to a couple of **modest parks** between buildings, which **parks will also be mainly in shadow.** That will **not be in the best interests of the health and well-being of the community.**

A 10 metre-wide path is inadequate. Passive walking, cycling and jogging paths now need to be at least 16 to 20 metres wide to provide for separate bike, jogging and walking paths for people travelling in both directions and to maintain social distancing (see **point 6** below). Further, there is now, and will be in the future, much more demand for passive and active greenspace including more sporting facilities.

Any development on the Precinct that will greatly increase the local population as much as the Study suggests dictates that additional infrastructure, schools, childcare, sporting facilities and services must be incorporated. And the schools, childcare and sporting facilities should be in separate purpose-built buildings on ground level, not jammed into podiums.

I suggest the footprint covered by buildings in the Study be halved and the podiums deleted entirely. This would leave space for additional recreational and passive greenspace and amplification of services and reduce the overshadowing of public space. This would also allow for such things as access roads, new sporting facilities, schools, childcare, separate bike paths and jogging paths and space to widen the walking paths and promenades to allow for adequate social distancing.

4. Visual Impact

No genuine consideration seems to have been given to the **visual impact of the built form envisaged by the Proposal.**

The Proposal envisages 9 new buildings will be erected on the Precinct. It seems 6 of them will be erected on the old Sydney Fish Markets site. Most of the buildings will have tall bulky podiums with even taller towers on top of the podiums.

The **buildings will stand shoulder to shoulder from Bridge Road all the way to the Anzac Bridge! From some angles, it will appear to be a solid wall of buildings.**

The tallest of these buildings will be 156 metres tall which is roughly the equivalent of a 53 storey residential apartment buildings and would be 36 metres taller than the top of the Anzac Bridge.

Even the shortest building will be the equivalent to 22 residential storeys high. By anyone's reckoning these are **massive, tall structures to be erected in essentially a waterfront residential village that has never had any building of such height and bulk.**

The sheer number, height, bulk and scale of all these buildings, so close to the foreshore, would be intimidating, lack human scale and lack any connection with the surrounding buildings and suburb. They would dominate the skyline, block part of the sky and dramatically change the feel of the neighbourhood.

I was particularly unimpressed by both the methodology and the conclusions of the Visual Impact Assessment (Attachment 15).

The author found many of the visual impacts to be HIGH, HIGH/MODERATE and MODERATE but, despite that finding, concluded approval could be granted subject to finding some strategy to Alleviate the Visual Impact. Another way of putting that is **approval cannot be granted unless the Visual Impact can be alleviated** (which, of course, cannot be done without a magic wand).

Of the 11 viewpoints selected only viewpoints 1, 3, 4, 5, 7, 9 and 10 were relevant.

There are no photomontages from the viewpoints of watercraft on the Bay, the new Fish Markets, Bridge Road, Wattle Street, the Glebe Foreshore walkway near the historic Walter Burley Griffin Incinerator or the Western Distributor!

Some photomontages are taken from up the hill on Ferry Street from which the Precinct cannot be seen, which is completely useless.

Some photomontages are sprinkled through the Visual Impact Assessment, but they are from poorly selected viewpoints and the photomontages downplay the significant bulk and scale of the proposed development and their effect as the proposed **built form is shown as transparent, ghostlike buildings that blend into the white clouds in the background.** Surely they could have been outlined in black or even shown against a blue sky.

This is particularly so in the photomontages taken Viewpoints 1, 3, 4 and 5 along the Glebe foreshore.

There are a few **artists impressions in the report, but they are even more misleading** as the upper floors of the proposed buildings are blended away into the sky.

This report, as do many of the others reports in the Study, shows all the signs of having been **over-workshopped by spin doctors** to the point it impacts on the professional integrity and intellectual honesty of the report. Is that why there were some 9 iterations of the report before it was finalised?

In short, it is incomprehensible that the visual impact of buildings of such massive heights and bulk, so close to the foreshore of Blackwattle Bay, could be “alleviated” sufficiently to make the visual impact acceptable.

This dictates the need to dramatically reduce the bulk and height of the proposed buildings in the Precinct to a height and scale in conformity with other existing nearby buildings and to remove the Podiums and Towers.

5. The Study proposes poor town planning solutions but there are better alternatives

The Study proposes spot re-zoning and planning control changes specific only to this Precinct. They are **not well thought out and integrated into a comprehensive urban plan**, housing plan, infrastructure plan or traffic movement plan for the whole Bays Precinct or indeed, the Greater Sydney area. Nor are they consistent with the surrounding built form.

The Study seems to primarily be an exercise in foreseeing the maximum height and density of the built form that future purchasers/developers of each lot will want and then then **ram through new planning controls in advance to suit the developers**. No doubt this is because the NSW Government wishes to fast track the sale of the foreshore of Blackwattle Bay to private interests at the highest possible price and prevent the community or IPC or any other authority having any say in the development approval process. However, this does not promote good town planning outcomes.

And there remain too many unresolved issues.

One massive unresolved problem for the revitalisation of the Precinct is the Hymix concrete batching plant in the Precinct. Page 71 of the Study indicates Infrastructure NSW has been informed by **Hymix that it does not envisage ever closing or relocating the existing concrete batching plant**. It has discussed a modified concrete batching plant in the basement of a residential building that can operate 24/7. Given the trucks, heavy vehicles, noise, dust and dirt generated by the existing 24/7 operations of the concrete batching plant that seems ridiculous. This shows how desperate Infrastructure NSW is to gloss over unresolved problems to get the changes to development controls rammed through before the public becomes aware of the problems. A new Hymix solution needs to be devised and agreed before any changes proceed.

Another unresolved issue is we are **still awaiting the long promised, comprehensive, integrated strategic Master Plan for the Bays Precinct**. Nothing should be done until that is in place and all the other things that remain up in the air are resolved.

No development controls should be changed before the community's concerns are satisfied and an acceptable alternative Proposal is devised, and all the things identified in the Study that are up in the air are finally resolved, including:

- **the Bays Precinct Master Plan,**
- **the Pyrmont Peninsula Place Strategy,**
- **whether there will be a Pyrmont Metro Station and, if so, where and when,**
- **whether there will be a light rail stop and, if so, where and when,**
- **whether there will be an adequate ferry services to the Precinct and the new Fish Markets and, if so, where and when,**
- **whether a solution can be reached to move the HYMIX Concrete Batching plant out of the Precinct,**
- **whether "alleviation" measures can be devised to overcome the significant adverse visual impact issues,**
- **whether a realistic traffic plan can be devised for widening Bridge Road and the intersections and solving the present and future traffic congestion in Pyrmont generally and Bridge Road specifically and managing the too narrow underpass under the light rail line,**
- **whether a realistic plan for providing adequate parking for both the New Fish Markets and the Precinct can be devised,**
- **whether the NSW Government will commit to the restoration and re-opening of the Glebe Island Bridge,**
- **an investigation into the presence of any contamination in the Bay and the Precinct and a realistic Plan to remediate it,**
- **finalise the Infrastructure Delivery Plan and a funding plan referred to on page xviii of the Executive Summary,**
- **whether a solution can be devised to ensure the private owners within the Precinct develop their lots as per the Proposal within a short time frame and hence deliver the promised Promenade, parks and other facilities, and**
- **a Bays Precinct Housing Policy.**

Rushed, piecemeal solutions and spot re-zonings do not promote good town planning outcomes.

Much less dense scenarios need to be explored and put to the community for consideration.

If Infrastructure NSW was really taking the community's views seriously the Study would have proposed an alternative plan for the Precinct with development restricted to low-rise residential buildings consistent with the character of Pyrmont and a few small-scale cafes and restaurants, a plan that is much more focused on delivering to the community much needed public parks, playgrounds, schools,

childcare, sporting facilities, active and passive greenspace and solutions for the existing and forecasted future traffic congestion and parking problems which will be exacerbated by increasing exponentially the residential and workforce population of the Precinct and by moving the Sydney Fish Markets to its new position as the new Fish Market underground parking is already forecast to be inadequate for demand.

Also very concerning is the proposal to declare the Precinct a “public authority precinct” so future public domain works would be controlled by the NSW Government not the City of Sydney Council, even if carried out by private interests.

Also, a step too far is the proposed changes to development controls to make the design and delivery of open space and public domain “exempt development so there need be no public consultation or approvals.

Equally concerning is that the proposed changes would mean projects of more than \$10 million would automatically be State Significant, and hence beyond scrutiny and approval by the City of Sydney Council.

A suggested alternative town planning solution

I submit that good, thoughtful, best practice town and urban planning dictates that when developing the Blackwattle Bay Precinct and the Bays Precinct (and indeed around all of Sydney Harbour) the state and local governments should strive to:

- maintain a wide band of public greenspace at the harbour’s edge, incorporating passive greenspace and a public boardwalk or Promenade linking to other such harbourside boardwalks/promenades all with good solar access.
- Incorporate wide separate cycle, jogging and walking paths as well as large parks, playgrounds, schools, childcare and sporting facilities.
- behind this public greenspace permit low-rise (perhaps 2 storey) townhouse style residential buildings should be built.
- behind that, permit low rise (perhaps up to 5 storeys or the height of the Western Distributor) apartments.
- behind that, if space permits, then perhaps higher rise apartments of, say, 10 storeys could be permitted perhaps with some restaurants and cafes on the ground floor.
- Any other retail, commercial or office buildings should be behind the apartments and/or under the Western Distributor

There is no justification for changing the planning controls to permit any podiums/street wall buildings and no justification for any buildings taller than the height of the adjoining Western Distributor in this Precinct.

Any built form on this Precinct, if tiered back from the Bay and greenspace in this way, will facilitate better view sharing, solar access and avoid domineering, intimidating buildings overshadowing the Bay, the public greenspace, the proposed Promenade, the Western Distributor, Wentworth Park, Pyrmont village, Bridge Road, the new Fish Markets, Glebe foreshore, Anzac Bridge and other neighbouring

residential and commercial buildings. This would greatly improve the liveability and amenity of the area and the lives of the residents, workers and visitors.

This solution is not novel. Similar solutions have been applied extremely successfully on the western side of Blackwattle Bay, on both eastern and western sides of Darling Harbour at Cockle Bay and King Street Wharf, around Pirrama Park and in other Harbourside suburbs.

This solution is pleasant to the eye, encourages locals and tourists alike to visit the area and is respectful of the low rise and historic nature of the area and the proximity to the Iconic Sydney Harbour and Anzac Bridge.

6. Covid-19 will change the way we live, work and play

The current Proposal and the analysis in the Study is old thinking.

Premier Gladys Berejiklian has warned the residents of NSW that we will never get rid of Covid-19. We will have to learn to live with it.

Infrastructure NSW and the NSW Government need to re-visit their plans for this Precinct to take this into account. They need to apply less greedy and **more skilful, considerate and appropriate town planning and landscaping solutions to suit the times and the locality, in view of the current and future living, working and shopping preferences of the community.**

This is the wrong time and place for such dense, mixed-use, high-rise redevelopment.

It has been widely reported (and I can confirm from my own family's experience) that business, retail, hospitality and residential accommodation requirements and residents' recreational needs have, because of Covid-19, changed permanently. For instance:

- **Most workers will now spend far less time in offices and work from home at least 2 or 3 days per week.** Employers are already downsizing office space, many by around 50%, and this trend is likely to continue.
- **Most families will now need larger homes and apartments with outdoor courtyards** and/or larger balconies to accommodate at least one or two income earners in each household working from home. School and tertiary and other higher education students will also do more study from home.
- **Apartments in tall skyscrapers will not be popular** in the foreseeable future as the Delta strain of Covid-19 spreads quickly in apartment buildings and it is virtually impossible to maintain 1.5 m social distance in a lift. Anecdotally, during the Covid-19 pandemic some owners and tenants of high-rise

apartments have moved to alternative accommodation in the suburbs or regions because of this problem.

- Most people now **buy their daily necessities on-line so the need for bricks and mortar retail space will decline even further**. Indeed, many retailers during the pandemic have already reduced their retail footprint and begun concentrating more on securing decentralised warehouse premises for on-line sales. Retail travel and tourism needs will also likely take years to recover.
- Even **our eating habits have changed**. Our economy in NSW is likely to be in a recession for some time after Covid-19 ends (whenever that will be) and restaurants will likely suffer for years as families have rediscovered the health, convenience and cost-saving advantages of home cooking.
- During the Covid-19 pandemic many **restaurants transitioned to take-away only** and some will continue that trend. Even when restaurants re-open **customers will want to dine in the open air, not in shopping malls** and the old-fashioned food court will likely be obsolete
- And because office workers and students are no longer satisfying their daily exercise needs by commuting to their offices and educational institutions and using gyms, the community has enthusiastically turned to **local green spaces to play sport, walk, run, cycle, and exercise** and that can be expected to be a permanent change.
- Further, to maintain social distance whilst exercising, **parks will need additional sporting facilities, paths that are at least twice as wide as pre-pandemic paths** with separate pathways for walkers, joggers and cyclists.

So, what does all this mean? I venture to suggest, **the Podiums/street wall buildings and first 9 floors of the towers allocated for retail, hospitality and office accommodation in the Proposal are destined to become white elephants**, high rise apartments will be hard to sell and the green space in this precinct will need to be increased dramatically and redesigned to accommodate the community's post Covid-19 needs and exercise patterns.

7. No consideration of the effect of the Proposal on the local communities

The Proposal does not offer any realistic proposal to address the adverse effect on the community of **introducing approximately 1550 new dwellings and probably 3,000 plus new residents** and approx. **5,600 plus new workers**, plus their families, visitors, private vehicles, delivery and service vehicles, shoppers etc. into what is a small, heavily constrained, corner of the historic, low rise, already extremely densely populated village of Pymont with its chronic traffic and parking problems.

Even the Traffic Management and Accessibility Plan (Attachment 4.1) acknowledges at page 153, *“The road network surrounding the Blackwattle Bay SSP study area is congested and highly constrained”*.

How will this huge increase in the numbers of residents, workers and visitors in this Precinct realistically be managed? There is **no firm, funded, approved, realistic plan for increased infrastructure such as widened roads, bike lanes, public transport, parking, schools, day-care or sporting facilities.**

I say realistic because there is no way adding traffic lights to a couple of intersections and removing a slip lane at the intersection of Wattle and Bridge Roads is going to help traffic move better through Pyrmont, the Precinct and along Bridge Road. Even the Traffic Study Attachment 4.1 concedes this (see Tables 7-10 and 7-11 which **shows traffic delays will get worse despite all the proposed “solutions”**).

The only solution offered is the fairy-tale that they will adopt strategies to discourage private vehicles

Infrastructure NSW really is ‘away with the fairies’ if it thinks this will become the first successful “private vehicle free” Precinct in Sydney. Despite the “sustainability” rhetoric this never works. Sydneysiders love their cars. And they need them. Eventually the developers will steal space from somewhere (like they did at Barangaroo) to provide parking for all the new owners of the multi-million dollar, water view apartments, leaving the visitors, walkers, shoppers, workers, delivery vehicles, tradesmen, taxis, ride share vehicles, car share vehicles etc. with **NOWHERE TO PARK. And then the Pyrmont traffic and parking will become a worse nightmare. A vehicle free precinct didn’t eventuate at Barangaroo, and it will not eventuate here either.**

The local **Pyrmont roads are so congested already it is difficult to see how any additional bus or alternative public transport services, Ubers, taxis, service vehicles, bikes and private vehicles could be moved through the narrow, congested streets of Pyrmont and the Precinct** to service this significant jump in population. It seems unlikely roads of sufficient width can be accommodated within the Precinct given the constraints of the Precinct and its environs.

The NSW government has not funded and committed to any realistic, definite, additional public transport solutions and:

- **The Ferry trial on Blackwattle Bay is presently suspended** due to Covid-19, but even when operational it is only a very modest ‘on demand’ service on a very small ferry with limited destinations. And it appears from the Study **there seem to potentially insurmountable difficulties with proper ferries being able to service the Precinct due to the Bay being a low wash area.**
- **And the proposed Metro Station is still only that - “proposed”.**

- **Light rail services exist in Pymont, but already operate at up to 95% capacity in peak times and the current stops are too far away. And there is no plan for a light rail stop in the Precinct.**

No practical solutions have been offered for problems such as:

- **how the increased waste generation will be dealt with.**
- **Where the coaches servicing the new Fish markets will park.** There are to be **no on-site coach parking facilities proposed for the new Sydney Fish Markets** so the many tourist coach drivers will need to park in the already congested back streets of the Precinct, Pymont and Glebe. Perhaps a better use of part of the old Fish Markets site may be to designate some permanent coach parking spots (rather than unwanted bulky Podiums).
- **how the existing Pymont residents will be affected by the disruption caused by such a huge re-development on a Precinct hemmed in on all sides with all its challenges** as acknowledged in the Study. It is difficult to see how the NSW Government could mitigate the disruption over what would probably be several years of construction given Pymont's roads are already inadequate to deal with the existing traffic load and given the narrow profile of most of the Precinct. This Precinct has significantly more ingress and egress challenges for earth moving equipment, cranes and other construction vehicles than Barangaroo. The fact is, Bank Street cannot be closed for years to accommodate the developers, like Hickson Road was, as that would make it impossible to get around Pymont or to get on or off the Western Distributor.
- **Is there any contamination in the Bay or the Precinct (as there was at Barangaroo) and, if so, how will it be remediated?** We have all seen the disruption on Hickson Road caused by the Barangaroo re-development and the contamination that had to be remediated largely on-site and on Hickson Road.
- **the adverse impact of the Podiums and Towers on the views of Blackwattle Bay from Pymont, Wentworth Park and the Western Distributor** approaches to the Anzac Bridge.
- **the adverse impact due to the loss of the Sydney City skyline views by residents and visitors from the western side of Blackwattle Bay, the proposed new Fish Markets, Blackwattle Bay Park, the Sydney Secondary College, the Rowing Club, Wentworth Park, the proposed Promenade along Bridge Road and generally around Blackwattle Bay.**
- **the adverse effect and discomfort the Glebe community will suffer due to the glare from the western sun reflecting from the glass windows of the too bulky Podiums and too tall towers.**
- how to mitigate the **light pollution** and the effect of lighting and **sound travelling across Blackwattle Bay** and the blocking of the views of the city lights from Glebe.
- The **communities demand for more greenspace** than that shown in the 3 Scenarios in the Blackwattle Bay Revitalisation study booklet.

In the preparation of the Study there also seems to have been almost a total lack of genuine consideration for the effect of the Proposal on the extended local community including:

- the many **dragon boat rowers, kayakers, canoeists, scullers, stand-up-paddleboarders, outrigger rowers, sailors, boaties, fishermen and other recreational users of Blackwattle Bay,**
- the many **residents, walkers, joggers, cyclists, visitors, tourists and exercisers who frequent the Glebe foreshore paths and parks,**
- the **restaurateurs and their customers, the rowing club members, the hotel and café customers and the schoolteachers and pupils on Bridge Road and the Glebe foreshore,**

all of whom currently enjoy the sunshine and City skyline views which will be destroyed by the proposed high podiums and towers.

And it seems only lip service is given to preserving the character of this historically very significant working harbour area. It seems the **Proposal is to simply replicate Barangaroo at Blackwattle Bay.** This is despite all the hollow vision statements, spin and claims of acknowledging the important and varied indigenous and maritime history of the Precinct referred to in the Study.

8. View Loss

We live on the western side of Blackwattle Bay and we, like most of our neighbours, are aghast at the Proposal.

Amongst other things, the gross over-development envisaged by the **Proposal would block the existing much prized “Manhattan Skyline” style view of the Sydney CBD** from the western side of the Bay.

This would adversely impact the enjoyment and amenity of many residents of Glebe as well as the restaurants, businesses and clubs on the western side of Blackwattle Bay and all the recreational users of Blackwattle Bay waterways, Blackwattle Bay Park, Wentworth Park, Bicentennial Park, Jubilee Park, the Bridge Road promenade, the proposed new Sydney Fish Markets, the Glebe foreshore walkways and Sydney Secondary College who also prize this view.

The too tall **Podiums and Towers will also block views of Blackwattle Bay and the Anzac Bridge from parts of Pyrmont, Wentworth Park and from the Western Distributor approaches to Anzac Bridge.**

9. Overshadowing

The Study claims the towers and podiums have been positioned to allow solar access. Well, that would be a **stupendous magic trick, for sun rising in the East behind a barrier of shoulder-to-shoulder towers up to 53 residential storeys tall to somehow penetrate the towers to deliver adequate sunlight to the Precinct, the**

Bay, Wentworth Park, Bridge Road, the new Fish Markets (and its rooftop solar panels) and the western shore of Blackwattle Bay.

No matter how the spin doctors present it in the Study, one cannot seriously suggest the impact of overshadowing caused by these multiple, too tall towers can be satisfactorily mitigated. It is clear **they will cast significant shadows over the Precinct, the waterways of Blackwattle Bay and parts of Pyrmont and Glebe.**

What is the point of building a new state-of-the-art Sydney Fish Market with a huge outdoor deck and solar panels, only to then overshadow it?

And what is the point of constructing a harbourside Promenade along Bridge Road and the foreshore of the Precinct only to build massive Podiums and Towers that cast it in shadow and rob it of solar access at the main time of day when people will want to use it, namely early mornings and late afternoons?

10. Wrong Type of Housing - hotels and apartments for Multi-Millionaires

The Proposal essentially envisages developers constructing hotels and **multiple, extremely high-rise apartment towers with water views (and probably marinas) for multi-millionaires, whereas the real need in the inner west is for more social housing and affordable housing to help those wishing to get on the first rung of the home ownership ladder.**

And if you really think multi-millionaires will be happy not to bring 2 vehicles each to their new apartments and to have a concrete batching plant in the basement operating 24/7 then you are kidding yourself, no matter how nice the apartments are and what public transport you provide.

A whole generation has struggled to achieve the great Australian dream of home ownership. The NSW Government apparently needs to facilitate a minimum of 40,000 new dwellings per year to satisfy community demand.

This Precinct would be an ideal place to provide affordable low-rise housing for the inner west's young singles, young families, first home buyers and social housing for essential service workers. This would be consistent with the existing residential character of Pyrmont.

Any changes to planning controls for this Precinct needs to be postponed until it can be fully integrated with the new housing plan of the NSW Government and the proposed Bays Precinct Master Plan, after appropriate community consultation.

11. Traffic and Parking

The authors of the Study have identified the terrible traffic congestion in Pymont, particularly around Bridge Road, and the extreme shortage of parking within Pymont.

But instead of tackling the problem Infrastructure NSW has come up with the Fairy-tale solution of pretending they can add about 8,700 people into the mix at the Precinct without any substantial provision for their vehicles or the extra vehicular traffic they will generate to drive and park. And they attempt to justify it on “sustainability” grounds. What a cop out.

Infrastructure NSW knows big buildings = more people = more traffic + need for more parking. But it knows it cannot supply adequate roads and parking for such a massive increase in population, so it is hiding behind “sustainability” and proposing limiting vehicles. It won't work, and the community knows it. The only solution is to reduce the number and size of the buildings.

The Study argues the government can introduce policies and strategies such that the residents of the new towers, the retail and office workers, the visitors, the delivery drivers, the tradesmen etc. will walk, cycle or use public transport. Talk about away with the fairies!

The hard reality is local public transport is already at capacity and Sydneysiders love the convenience of having their own car.

And, so far, the new public transport strategies they refer to are a figment of someone's imagination. Ferries can't service the area due to low wash restrictions in the Bay, the proposed Pymont Metro station is still up in the air and the light rail stops are too far away and it already operates at 95% capacity.

This “sustainability” agenda is **another example of out-of-date thinking and grasping at straws to deny the obvious**. The petrol and diesel vehicles are the “bogey men” of the past. The **future of vehicles is clean electric, hydrogen and hybrid vehicles. You can no longer argue to keep vehicles out of cities and suburbs based on sustainability**. Plus, public transport and ride share services are now dangerous venues for catching Covid-19 and probably create greater pollutants than the cars of the future. It is obvious better roads and more parking is essential as is reducing the size of buildings and the number of residents and workers coming to the Precinct.

And, as for pinning your hopes on bicycles, residents and workers may be prepared to travel short distances by bike on a fine day, but on wet, cold days or when they must travel long distances or when they have children, pets or heavy items to transport they prefer their own private car.

As they found at Barangaroo, **it is a pipe-dream to hope a multi-millionaire will buy a water view apartment but will not want to bring his or her car with them.** Most will want parking for 2 cars per apartment. And they will have parties and functions so their friends and families will need adequate roads to drive on and adequate parking. It is well known that initially there was to be no residential parking at Barangaroo for “sustainability” reasons, but eventually parking had to be found for the buyers of the luxury residential apartments.

So, it can be safely assumed that the new residents of the proposed towers in this Precinct will also bring their vehicles, adding to the local traffic congestion and parking problems.

Peak hour traffic through Pyrmont is already at gridlock.

Most traffic heading west out of the CBD travels through Pyrmont. And during the afternoon peak hour there is a long queue of vehicles trying to get onto Harris Street and another long queue trying to get up the ramp from Pyrmont onto the Western Distributor and Anzac Bridge and traffic is also backed up from the Bridge Road underpass under the light rail all the way back to Wattle Road.

Pyrmont is bisected by the Western Distributor and the ramps and supporting columns of the Western Distributor approaches to the Anzac Bridge, making through traffic difficult and requiring diversions around the obstructions.

Add to this that the **number of visitors to the new Sydney Fish Markets on Bridge Road is forecast to double from 3 million to 6 million over 10 years** bringing added pressure to the congested roadways and lack of parking.

The DA for the new Sydney Fish Markets indicates **45% to 50% of all journeys to the current Sydney Fish Markets are by car.** For some reason that escapes me, the applicants forecast this will drop to 40% over 10 years. That would still **be 2.4million cars per year arriving and leaving along Bridge Road and Wentworth Park Road.**

The Glebe Society estimates that 70% of visitor arrivals will be by car and that seems more realistic to me. However, the plan for the new Sydney Fish Markets does **not provide for any increase in available car parking nor for coach parking** and **the applicant has already admitted weekend parking demand will exceed capacity on-site.**

Importantly, Bridge Road, the main thoroughfare leading from Pyrmont to Glebe, is already at breaking point. Traffic along Bridge Road must narrow to one lane under the light rail underpass near the Glebe Light Rail stop. This already causes extreme congestion in the morning and afternoon peak hours. This congestion will only get worse once visitors to the new Sydney Fish Markets double.

The combined effect of the new Sydney Fish Markets and the proposed redevelopment of the Precinct will result in significant extra traffic, more traffic delays and worse congestion problems:

- at the corner of Wattle Street and Bridge Road,
- on Banks Street in both directions,
- on the ramp to Anzac Bridge,
- at the corner of Wentworth Park Road and Bridge Road, and
- at the Bridge Road underpass beneath the light rail.

Also, I anticipate cyclists on Bridge Road will need their own dedicated bike lane thus likely removing one lane from Bridge Road.

In recent years many **parking stations in and around Pyrmont have been demolished**

All of this contributes to **terrible traffic congestion and a severe lack of parking in Pyrmont.**

These problems also extend to Glebe.

If a further 2,000 to 3,000 odd vehicles are added to the mix by the construction of 1550 new dwellings plus premises for businesses to employ 5,600 people within the Precinct, traffic on Bridge Road and surrounding streets will grind to a halt.

None of these problems are addressed in any realistic way in the Study. Apparently, **the spin doctor authors of the Study think by simply saying the goal is to have few vehicles in the Precinct this will make all the vehicles magically disappear** along with all the existing and future traffic and parking problems. That will not happen and by living in cloud cuckoo land the NSW Government would be abandoning its responsibilities to the people of NSW.

Infrastructure NSW needs to accept and grapple with these very real problems, and devise realistic solutions **before seeking to change development controls**

And all these problems reinforce the need to keep development in the Precinct to much less dense and lower rise residential buildings, without podiums and massive towers.

12. Conflict of Interest

Local councils and the NSW State Government are meant to be the gatekeepers, charged with restraining the natural inclination of developers to over-develop sites and requiring developers to comply with thoughtful, responsible town planning principles and design excellence.

However, this Proposal seems to be an exercise in foreshadowing the maximum built form any developer could wish for, and then change the existing planning controls in advance to suit those developers. Perhaps this is to fast track the sale of the foreshore to private interests at the highest possible price.

Certainly, it seems like a strategy designed to stymie any review of a future Development Application by the community, the Land and Environment Court, the IPC or any other body.

Recently, the worst ambit claims of developers in Pyrmont have been reined in by the IPC. But this can only be achieved where the developers' plans exceed the current planning controls. If the planning controls have already been cranked up to permit bulky podiums and massive towers so high, they could theoretically impede aircraft, then the sky is literally the limit, and the authorities (such as the IPC) will be powerless to rein in developers' excesses.

I realise state governments Australia-wide currently, have demands on them to help the community to overcome the problems caused by COVID-19 and the lockdowns and to provide jobs, additional housing and funds to cover the inevitable cost overruns of infrastructure projects. I also appreciate the cost of the Sydney Fish Market relocation continues to blow out. I understand it is now around \$750,000,000.

However, it would be unfair for the NSW Government to try to solve all these financial, housing and job problems by inappropriate development of this small, heavily constrained, corner of land, in the already densely populated village of Pyrmont. To do so would be terrible town planning, a gross over-development of the Precinct and a betrayal of the local community.

So, it seems **the NSW Government has a significant conflict of interest here.**

This conflict arises as it seems it will be both the owner/vendor of a significant portion of the Precinct (being the old Sydney Fish Markets site) as well as the entity being asked to approve the proposed changes to the existing development controls, which will determine the market value of the Precinct. This will not lead to good town planning decisions.

I look forward to hearing how the NSW Government proposes to overcome this conflict of interest and whether it would consider **returning planning controls for this Precinct to Sydney City Council to bring back transparency**, best practice town and urban planning and independence to the process.

13. Precedent

I am also very concerned that if the NSW Government were to press ahead with setting revised development controls in line with the Proposal this would set a terrible precedent that would be unwelcome by the communities of both Pymont and Glebe and ultimately lead to a fundamental change to the established character of the area.

Where to, from here

I call upon the Minister and the Premier to take a breath, pause any changes to development controls for the Precinct, listen to the voice of the community and send Infrastructure NSW and this Proposal back to the drawing board to come up with an alternative proposal that is respectful of the wishes of the community, reflects the context and character of the locality and truly honours the promise of returning this important stretch of the foreshore to the community.

Yours faithfully

A solid black rectangular redaction box covering the signature area.

182731

[redacted]

Glebe 2037

please find my submission attached

Blackwattle Bay – State Significant Precinct Study

Submission

Pymont is not the CBD or Barangaroo.

Pymont is not the CBD and is not an extension of Barangaroo. Its current village-like ambiance and low rise environment appears to complement its location and topography. This development should be in sympathy with Pymont- its history and previous good planning.

The Blackwattle Bay foreshore is an ‘Open Space’ jewel of Sydney

The western foreshore of the Bay is characterized by very accessible bright and sunny open space, with generous park areas and very well patronized walkways and cycle ways. This eastern shore development should be in sympathy with the western side of the Bay, as well as the existing Pymont foreshore from the Glebe Island bridge all the way around to the Pymont Bridge.

What is the Incremental Value?

Upon completion of the new Sydney fish market site, it is essential that the existing SFM site is then developed in a manner which delivers appropriate additional residential and commercial space and critically more open space along the foreshore of the Bay.

It is acknowledged that the key financial outcome of the proposed development must be the recovery of the costs of the new SFM. However, it is unclear what the justification is for any additional financial return – especially when compared to the apparent trade-off of reduced public amenity.

What additional incremental value and amenity for the local environment does this proposal offer, which would not be adequately delivered by fewer and lower buildings? – very little I suspect!

What additional value for the local environment would flow from more and better quality unshaded open space? – substantial I suspect!

Foreshore Inconsistency

The limited open space and narrow pathways of this proposal will create a noticeable blight (inconsistency) with the immediately adjacent open spaces and wide pathways along the western Bay / new fish market foreshore at one end and the Pymont point foreshore at the other end.

Height of the ‘Wall of Towers’

The towers are too high, too close to the foreshore and entirely inconsistent with the existing graduation of high rise from the extremes of the CBD, through the mid-heights of Pymont and onto the lower skyline of Glebe.

In the morning the proposed towers will cast a shadow over the eastern foreshore, Blackwattle Bay itself, and the new SFM precinct. Pymont will in turn suffer from material shading in the afternoon.

Visual Impact

In the Landscape Character and Visual Impact Assessment (LCVIA) prepared by Clouston Associates, 12 of 20 viewpoints demonstrate a moderate, moderate / high or high rating.

It is very relevant and it should be noted that all 12 of these viewpoints are located closest to and have the widest perspectives of the proposed development. It should also be noted that the remaining 8 viewpoints registering the least visual impacts provide only narrower and/or diminished and/or more distant views.

This imbalance of visual impacts emphasizes the inappropriateness of the proposed wall of towers.

Impact for Tourists

International tourists to Sydney typically expect and are impressed by Sydney's relatively low-density built form, our big sky and our fresh produce. However, a new world-class working fish market, adjacent to and over-shadowed by a high rise wall of towers, will deliver a severely disappointing experience – and totally inconsistent with virtually all other areas of the harbour foreshore.

What other international city in today's world would acquire a beautiful bright and open foreshore and destroy it by building a wall of towers driven totally by financial greed?

Inadequate Open Space and Narrow Pathways

At present, a relatively wide shared cycle way and walkway extends along the foreshore from Rozelle Bay to the new SFM site, and then from Pyrmont Point all the way around to the Finger Wharf in Woolloomooloo. The only existing gap in this amazing harbour-side thoroughfare is the proposed development site on the eastern shore of Blackwattle Bay.

The proposed development is characterised by narrow open space and a narrow walkway/cycleway. A "pedestrian and cyclist" traffic study is necessary for both the western and eastern sides of Blackwattle Bay, to forecast traffic volumes and the required magnitude of pathways and open space on the eastern side.

Narrow pathways will discourage visitors from walking/cycling to the new SFM site, thus encouraging additional road traffic.

182736

[redacted]

2009

We strongly believe that this development creates some concerns and negatively impact us (see attachment for details).

Below are the key concerns:

- New developments will lead to a much higher density of residents putting greater strain on already struggling infrastructure and facilities

- Upon closer inspection of the document Attachment 14: Draft Design Code Final (2) and Attachment 15: Visual Impact Assessment it is now understood that one of the mixed residential towers will be towards the right-hand side of the current Bank Street + Quarry Master Drive intersection. Currently, the proposal suggests this could be as high as 18 stories. And the adjacent tower to the left of the intersection is higher than 18 stories. This presents the following challenges for the residents & owners:

- Reduced property value & downgraded living: 18 story building along with the adjacent building (higher) will eliminate the view to the bay altogether and residents will stare into large towers. This will have a considerably high negative impact on the investment/ asset value of 150 owners and approximately 400 people residing in 120. Many of the residents had based their investment decisions on the bay views. I have advised the project team that when new construction takes place of a house a due process is followed with DA submissions. Furthermore, it drastically downgrades the living experience of current/ future residents.

- Increase in Noise & Vibration: Attachment 18: Noise and Vibration Assessment advises that the buildings will be planned in accordance with the codes to ensure the occupants of new towers, are not impacted by noise with correct distance & height. However, the current plan fails to advise how the new construction will have an adverse impact on current residential towers along Bank Street. I have proposed that in addition to ensuring the building height does not adversely impact the views of 120 Saunders plans to remedy the noise pollution & vibration are understood by doing the following:

- a) Assessment done for 120 Saunders Street now to ensure the current noise pollution is understood

- b) take the above assessment into account when factoring in the new construction

c) provide noise & vibration reduction for current & future residents by putting large glass panels along the Anzac bridge to deflect the noise

d) provide appropriate noise reduction for 120 Saunders Street through Noise Abatement Programs such as Double-Glazing Door & Windows and Noise reduction curtains.(NSW Gov has done this before)

Regards,



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

As the owner of Bayview apartments [REDACTED] we had received notification of the development plans submitted for Blackwattle Bay redevelopment along with the technical documents as plans on display. The current plans call for significant mixed-use development along Bank street with towers close to 18 stories and adjacent buildings even higher.

As the owner of this building, we strongly believe that this development creates the following concerns and negatively impact us:

a) Character: While it is mentioned the current plans have been developed in consideration of the character of the neighbourhood the following attributes of the development negate that:

- Setbacks and building height: The proposed buildings reaching higher than 18 stories it does not consider the current building heights along Bank Street which is a major setback.
- Location and size of private open space: Consultations in the past advised the Department of Planning to increase the number of open spaces considering Pyrmont to be one of the highest density suburbs. The current plans overlook the recommendation. The large mixed-use towers will occupy what was intended to be allocated open space with only small land allocated for open space, thus compounding the current issue of the suburb density.

b) Overshadowing: The developments along the intersection of Quarry Master Drive and Bank Street will significantly overshadow the [REDACTED]. The positioning of new towers in the current plans does not provide an accurate assessment.

c) Overlooking/loss of privacy: The residential & commercial use of the tower along Quarry Master Drive and Bank Street will create overlooking and loss of privacy and have a negative impact on us and the residents. Bayview towers were created with many apartments with balcony doors and windows facing the bay and Bank Street. The loss of privacy will negatively impact the living often resulting in residents having to down their blinds or installing other mechanisms.

d) Visual bulk of building: The development of the intersection of Quarry Master Drive and Bank Street will result in large, bulky buildings impacting the outlook of neighbours and dominate private open space areas such as apartment balconies facing the bay. The proposed developments would discourage many residents to

enjoy the outdoors and prevent them from enjoying access to sunlight as they do as a result of overshadowing.

e) Overdevelopment: The plans suggest the Department's view is to go for a balanced outlook; however, this is not accurate. The addition of hundreds of apartments and office space will be considered as overdevelopment of an already congested area. As highlighted above the current fish market and private land should have been opened for the residents to have better access to open land.

f) Residential noise and vibration: The current assessments advise the buildings will be planned in accordance with the codes to ensure the occupants of new towers, are not impacted by noise with correct distance & height. However, the current plan fails to advise how the new construction will have an adverse impact on residents of [REDACTED] along Bank Street. With the increased development the noise pollution & vibration must be understood by doing the following:

o a) assessment done for [REDACTED] now to ensure the current noise pollution as per the standards incorporated into the development

o b) ensure take the above assessment into account when factoring the building heights of the proposed construction

o c) provide noise & vibration reduction for current & future residents by putting large glass panels along the Anzac bridge to deflect the noise

o d) provide appropriate noise reduction for [REDACTED] through Noise Abatement Programs such as Double-Glazing Door & Windows and Noise reduction curtains

In consideration of the above concerns, I and residents of [REDACTED] believe the heights of the buildings must be reduced significantly to not have an adverse impact. Furthermore, great effort needs to be put into understanding how the proposed plans negatively impact an already noisy and densely populated Pymont and in the particular intersection of Quarry Master Drive and Bank Street.

There are further comments regarding this redevelopment on the following pages.

Looking forward to a favourable and considerate response.

Yours faithfully,

[REDACTED]

GLOBAL COMMENTS

1. Greater Sydney Commission and Planning Excellence

In one of the documents that I read when reviewing the *Blackwattle Bay State Significant Precinct Study*, I noted the concerns that the Greater Sydney Commission's concerns about the complexity of planning in the Blackwattle Bay area.

No-one can deny the amount of planning studies that the Pymont Peninsula has been subjected to. Unfortunately, I cannot believe that this most recent study would assuage the Commission's concerns. This study is perhaps the most repetitious, poorly structured/written, and hard to read document that I have had the displeasure of reading. Rather than a true planning study it is more of list of acronyms, tables and references to other studies and planning documents and what they require rather than advancing planning for the site and Pymont Peninsula and garnering support.

It also occurs to me that the report was developed to accord with the principles of the Yes Minister/Prime Minister TV series:

1. Get Rid of the Problem in the Title
 - this Study is not about Blackwattle Bay but less than 50% of it
: only the portion you WANT to include in the Study
2. Is it the right weight? The report is
 - poorly structured, the report hides important comment deep in the document.
 - unbelievably repetitive and more a list of requirements from other documents and statements about "that" it responds rather than actually responding.
 - filled with numerous figures missing codes and which should have been amalgamated
 - missing all the documents frequently referred to as attachments, the contents of which should have been discussed properly in the report.

Having struggled through the report I am left with the impression that the report is intended to bore and confuse the reader to limit legitimate and reasoned response.

The number of times that the document refers to the need for future studies and decisions clearly makes it an inadequate report on which to move forward.

The report also repeatedly refers to the need for planning excellence. I have difficulty in accepting that this report represents "excellence" in any form. Just saying the words does not make it so.

2. The Precinct and Place-Based Planning

All sites or precincts exist within something of a higher order. As I commented in my submission on the new Sydney Fish market, that study sought to avoid significant issues by limiting the extent of the geographic space under consideration and sidelining the impact of that area on the surrounding. While this study report refers to the surrounding areas its treatment of them is inadequate and seems to adopt a "not our responsibility" and "somebody will look at that later" approach. How can that be planning excellence if a site is planned before its impacts on the surrounding area is known. For example, it takes 148 pages to acknowledge that further study of utilities such as water, sewerage, electricity and gas in the Pymont Peninsula is required and 154 pages to acknowledge that a Pymont Infrastructure Study is required yet seeks to develop the Blackwattle Bay Precinct as narrowly defined in advance. It is unsurprising that the Pymont community is not supportive and lacks confidence.

Rather, the Blackwattle Bay study, is myopic and essentially deals with the old Fish market site and the Bank Street foreshore – although that part of the site is primarily dependant on "future" decisions. Is this really good enough for a site of such significance and reflective of planning excellence?

My other general comments on the site are that it:

- **Fails to address the gateway to the Bay – Glebe Island Bridge.** This heritage item is too important to be largely ignored in a plan for Blackwattle Bay. Surely it cannot be planning excellence to deliberately ignore/defer this important but decaying heritage item to future decisions. Then, suddenly at p 134 there is an alarming statement slipped in that talks about “construction of a “new crossing” between Glebe Island and Pyrmont that “could support walking cycling and public transport”. What does this mean for the existing and much-loved Glebe Island Bridge and, if this structure or a new one is recommended it would totally change the need to funnel cycling and public transport through Pyrmont as the harbour foreshore would be a far more logical and acceptable route. This needs to be decided before the Blackwattle Bay infrastructure is constructed.
- Fails to properly deal with the roads and traffic issues that border the site. Decisions on major roads bounding the site need to be agreed before planning for the site is finalised.
- Fails to deal adequately deal with utilities infrastructure (water, sewerage, gas and electricity capacities) are properly assessed and, where necessary upgraded. Having only recently recovered from the disruption caused by the Darling Harbour redevelopment, residents of Pyrmont are rightfully concerned about future severe disruption while not only building works at Blackwattle Bay are undertaken but also a major upgrade of water and sewerage from the southern end of the Peninsula are upgraded/replaced.
- Treats surrounding areas of Pyrmont, Ultimo and Glebe differently with Pyrmont being the big loser when it comes to issues such and noise and solar impacts and the impacts being hidden and only fleetingly discussed in the latter parts of Study.
- Conflicts with previous studies such as the Pyrmont Peninsula and transport studies (the latter talking about closing and narrowing roads in Pyrmont and this study speaking about opening and widening them.
- Defines out the western foreshore of the Bay just as it does the bordering roads. I note the consultation with the Sydney College (owned and controlled by the State Government but if I was a resident of Glebe, I would fear that “Glebe is next”.
- Caves-in the commercial interests to the north of the current Fish market site including, but especially the Hymix site which is simply not congruent with the aims of the Study. Anyone who currently lives in the Miller Street area would be aware just how much concrete dust this facility spreads over the neighbouring areas. Its 24-hour operation also creates a lot of noise from trucks at night as well as its trucks being one of the major transport problems in the locality. Just because Hymix say its facility is essential does not mean it is so – it probably isn’t. It must go before the old Fish market site is redeveloped. Even the study indicates the problems it will create for the site let alone the surrounding areas.

All “private land-used, if advised now should have plenty of time to relocate before the mid 2020s and the sites then compulsorily resumed as they are inconsistent with not only the site but surrounding residential areas.

3. The World has Changed Irrevocably – Catch Up!

While I note the numerous planning studies that have been conducted in the past and their predictions of housing, commercial space, and employment needs, are used, COVID has rendered these studies out of date.

Working from home is now a fact of life and it is highly unlikely former “office-based” will return. Work will return to anything like previous levels. Health Directions also inhibit the number of workers who can occupy any space and the demand for apartment living weakened. We will not be going back to previous models and your demands should be revised to reflect this and recognise the excess of space that now exists in the CBD.

There are already predictions of a glut of office space in the CBD and retail shops there are in desperate need of additional city workers. Building office space in Blackwattle Bay will only exacerbate that problem and should be reconsidered. It is highly likely that a lot of the “Innovation Corridor” requirements can be satisfied without Blackwattle Bay.

Similarly, apartment and inner-city living has lost a lot of its attraction as working from both home and moving to regional areas has been both feasible and desirable. Your arguments about “affordable housing are also badly diminished by your acknowledgement that only 1.7% of the residential floorspace on the site will be for that purpose (as opposed to 5-10% across Greater Sydney), your failure to identify where that will be and your arguments that it should not be mixed with medium and high-end housing. Essentially, therefore you are proposing a waterfront development for the rich.

4. Impact on Pyrmont

Throughout your report you downplay the impact of your proposals on the existing community of Pyrmont. Glebe and Ultimo feature far more prominently in your report than does Pyrmont and your proposals frequently conflict with previous studies. Ultimately, buried deep in the document, you admit that further work is required to properly understand the impact of the proposals on Pyrmont – a clear indication that the site area is considered more important than the remainder of the suburb.

Pyrmont residents are not opposed to development, but it needs to be appropriate development. We know that the Star tower proposal is not dead, and fear being squeezed into a sunless valley with the Star blocking our morning sun and Blackwattle Bay our afternoon sun. Leaving development approvals in the control of a Minister or a Departmental Secretary simply adds to that concern and mistrust.

5. Attachments

The Study refers to 41 Attachments stating that information can be found in them – it isn’t provided in the document under review.

However, the Attachments are not provided nor are there links to them? Why is that?

DETAILED COMMENTS ON THE STUDY/REPORT’S CONTENTS

Page	Issue	Comment
xi - xiii	Increase international visitor length of stay and expenditure	Wording reveals the truth about the proposed development as an adjunct to The Star and an as a “cash-cow for the NSW Government
xiv	Precinct Plan - comprehensive urban design visions and strategy	This is highly debatable. A comprehensive Plan would properly cover all of Blackwattle Bay not just select parts and even the Study show much planning is yet to be undertaken.
xv	Extension of Miller Street	The Study exhorts the through site roads and lanes but ignores the reality of the problems that the current Fish market creates for Miller and adjacent street. The plans for the street and laneways will add problems for surrounding areas Pyrmont does not improve the problems there. You even admit that the transport modal mix that you are espousing is aspirational and will be difficult to achieve. Referring to extending Miller Street Saunders Street as providing vistas is also grandiose.
xiv	Glebe Island Bridge	Based on the report the old Glebe Island Bridge is THE MOST SIGNIFICANT heritage item (European or First Nations) in the vicinity. I cannot believe that a planning body claiming “planning excellence” in place-based planning could leave the gateway to Blackwattle Bay out of the Study. The Study is monotonous about the much trumpeted “world

		<p>class Fish market that will be erected at the head of the Bay. Yest the Study cannot even bring itself to admit that the Glebe Island Bridge, the most important and much-loved heritage feature in the Pymont landscape actually exists. and lies rotting. It is not only “planned out” of the Blackwattle Study, it is referred to in Figure ES2 as “Future Connection to Glebe Island”. WHAT! How can a planning authority that touts itself as delivering planning excellence leave a small sliver between 1-3 Bank Street and Evolve as unresolved in this Study? Sham eon you!</p> <p>Then, buried incredibly deep in the Study at Page 135 the Study states <i>The construction of a new crossing between Glebe Island and Pymont could support new walking, cycling and public transport links.</i></p> <p>This is extremely worrying to Pymont residents concerned about our heritage and would lead us to believe that the existing bridge is going to be left to rot until cannot be salvaged and is replaced by a new structure. This cannot be allowed to happen.</p> <p>Further, as hinted at in the report a Glebe Island connection could allow a huge volume of pedestrian and cycle movements (but perhaps not public transport) to be diverted out of residential Pymont and onto the harbour foreshore.</p> <p>This matter should be resolved before development of Blackwattle Bay is commenced and cannot wait for planning of Glebe Island to be undertaken and agreed.</p>
Xvi	138,000 sqm of space for employment.	For the reasons mentioned above, I believe this is now excessive and should be downsized significantly.
Xvii	16 Principles	I would contend that the Study fails against Principles 5,6,11, 13 and 16 and, as such fails the test of design excellence.
9	Precinct Plan	<p>The Study states <i>The current planning framework applying to Blackwattle Bay is complex, with controls contained within several different planning instruments. This is inconsistent with planning best practice and will not facilitate the realisation of the vision for a renewed Blackwattle Bay.</i></p> <p><i>The Blackwattle Bay SSP Study outcomes will establish a new planning framework to guide the future land uses, design and development of buildings and public domain in the Precinct.</i></p> <p>That may be the authors’ view. Put simply I do not accept it. For reasons I have explained above and below I believe that the Plan is inadequate and not a sufficient basis on which to proceed.</p>
9	9 Project Objectives	To my mind the Study fails Objectives 4, 5 and 6.
9	A2.4 Project Governance	I am opposed to the proposed Governance model which completely lacks local representation. It needs to be broadened to obtain community input because State Government agencies clearly do not understand/accept Pymont community views.
10	Study Key Principles	This is the clearest example (as if one was needed) that there is no interest in the existing residents and businesses (except perhaps The Star) of Pymont. Please remember that the future of casinos in Australia and Sydney and Melbourne in particular is now under a serious cloud.
21	Privately Owned Lands	Does Hymix ACTUALLY own their site??? I recall being horrified some years ago at seeing media that their “lease” had been extended by 50 years.

		<p>Either way:</p> <ol style="list-style-type: none"> 1. I would question that any site that relies all raw materials to be trucked in is essential (maybe the output is but it could be delivered from elsewhere just as when the Hanson's facility on the new fish market site has been 2. The report clearly indicates that the facility is inconsistent with the proposed development but fails to acknowledge both the adverse noise and cement dust problems that the site creates for surrounding areas of Pymont. 3. Of course Hymix will argue that the site is essential but that does not make it true. If Hymix were given its marching orders now they would be able to relocate before the new Fish market is opened. <p>For similar reasons, I cannot see why other privately-owned lands facilities could not be successfully relocated with three years notice.</p>
23	B3.6 Other Uses	<p>This discussion is not consistent with latter information which describes 1-3 Bank Street as a local heritage item.</p> <p>There is also no clear indication of what is proposed for the "new temporary 5-year maritime facility" and the Dragon Boats storage. Relocation of the dragon Boats is never discussed.</p>
27	Gradients	<p><i>The gradients along some footpaths on routes towards public transport stops and major transport hubs (Town Hall and Central stations) are steep. Are you serious? Have you even walked them?</i></p>
28	Light Rail	<p>Figure 11 – are you not aware of the John Street Light Rail stop or do you just not want to admit to its existence?</p>
29	Parking	<p>This is a clear example of the authors' myopic approach to planning. The statements are ignorant in that they deal only with "on-site" parking and ignore the "off-site" parking volumes and issues created by the infestation of small buses from The Star and the Western Suburbs that are not catered for in either the old or new Fish markets. Drivers have, in the past told us that the Council allows them to park contrary to street signs. We have observed Council Rangers walk past/ignore illegally parked vehicles in the past and have no confidence that this will not occur in the future.</p>
30	Heritage	<p><i>"There are no heritage items of local significance in the Blackwattle Bay Study Area".</i></p> <p>Clearly defining out the Glebe Island Bridge and the assists this argument as does the Kauri Foreshores Hotel that support my arguments about the site definition. However, the Study a lot later mentions the local heritage importance of the buildings on 1-3 Bank Street – so much for planning excellence. Also excluded seem to be the two on-site parcels of Aboriginal peoples' heritage and the in-cliff cave shelter at Jacksons Landing.</p>
37	5 Big Moves	<p>It could be reasonably argued that Pymont residents are not interested/in favour of Big Moves 2 and 3. Neither of which have benefit to us.</p> <p>It is also of interest that none of the 5 Big Moves mention housing or work – two of the big principles allegedly underpinning the study.</p>
54	Minister may waive requirement for a master plan	<p>If the Blackwattle Bay site is as significant as claimed, how can it be argued that development of a Master Plan is unwarranted. Doing this is tantamount to stifling legitimate and important debate and should be strongly criticised.</p>
55	SLEP Heights	<p>Figure 24 is intentionally confusing in that the heights indicated do not indicate whether they are metres or floors.</p>
62-64	Reconnecting The Bay To Its Surrounds	<p>The naming of the street and lanes (e.g. Gipps) is not explained as to its connection with Pymont.</p>

		<p>Further, the extension of streets such as Miller and Saunders seem to have far more to with movement through the site than connecting the neighbouring areas of Pymont. In fact, connecting Miller and Saunders Streets to the foreshore are likely to increase difficulties for the residents of those streets.</p> <p>The recently installed cycleway in Miller Street is a failure (most cyclists use the newly narrowed roadway instead of the cycleway) and hated by many residents because of the problems it has created.</p>
64	Community Consultation	As evidence by the statements in the Study, the community consultation has not been with residents but with bodies that might be expected to support development proposals – it is “fake” consultation
71	Hymix	I view the comments here as an ambit defensive position by Hymix that could not be reasonably sustained. The Hanson’s plant was removed for the new Fish market and despite pressure by Hanson’s it was not relocated to Glebe Island. Pressure by Hymix to remain should be similarly refuted.
73	Building Heights	<p>While a majority of people may have opted for Scenario 2 that does not mean that we like it. It is akin to being asked how you want to be executed – being electrocuted, being hot or having your head removed.</p> <p>None of the three scenarios are acceptable to most Pymont residents that I have spoken to who all believe that the heights of the buildings are excessive and that they will result in significant afternoon shadowing for significant parts of Pymont village.</p> <p>The study deals with avoiding morning shadowing of Glebe and Wentworth Park but remains silent when it comes to Pymont.</p> <p>If ever The Star Tower is built, we could be in shadow in both the morning and afternoon especially in winter.</p>
75	First Nations Culture	Is this it? Is this all you could come up with despite First Nations supposedly being a significant component of your philosophy?
81	Roads	<p>The current Gipps Street Pymont terminates on the Eastern side of Harris Street Pymont and there appears no intention to extend it to the current Fish market site. Why then are streets in project area being called Gipps Street and Gipps Street and Gipps Lane – just as the bisected Jones Street does. Also why is the nomenclature European and not based on Aboriginal words?</p> <p>I also strongly oppose any road system on the site than promotes vehicles from the site moving through or seeking parking in the residential streets of the remainder of Pymont.</p>
85	Proposed Road Hierarchy	Figure 33 shows Miller Street as a ‘Major Road’. This is both unreasonable and unacceptable to Miller Street residents. Our street has always been a busy and heavily used road and is often a bottleneck in the weekday afternoon. The recent addition of the cycleway has reduced its carrying capacity and increased the danger for accidents between bicycle and vehicular traffic. It does not have the capacity to carry additional traffic generated by the proposed Blackwattle Bay development. Through traffic should instead be funnelled onto the largely not residential Pymont Bridge Road.
86	Development sensitive to adjacent development.	<p>This is not correct. Your report concentrates on open space and sun planes for Glebe Foreshore, Sydney Secondary College and Wentworth Park. It totally ignores afternoon sun planes for Pymont Village which will be completely overshadowed in the afternoon. This is unacceptable.</p> <p>For the study to justify building heights on mirroring those on Distillery Hill is also laughable. Those building are constructed on a far higher elevation, and far less floor and create far less afternoon shadowing than will those proposed for Blackwattle Bay.</p>

		<p>As well as shadowing the existing residential areas of Pymont Village the proposed building will also cause a loss of both views and privacy for existing dwellings.</p> <p>Yet again I must object to the myopic views expressed in the report about the need for appropriate sun-planes on site but total disregard for the sun-planes of Pymont Village.</p>
88	138,000sqm employment floor space	As stated elsewhere, I do not accept that this minimum can be justified in the posit COVID environment especially when there is so much concern for excess floor space in the nearby CBD.
93	Maximum Building Heights	<p><i>The proposed maximum heights will ensure that appropriate solar access protection is afforded to existing and new open spaces.</i></p> <p>This is another clear example of how myopic the authors are. Your concern is for the site and totally ignore the impact of your proposals on Pymont Village. How can this possibly be “planning excellence”?</p>
94	Affordable Housing	Your admission that only 1.7% of residential space in the development will be for affordable housing compared with 5-10% across Greater Sydney makes a mockery of the other statements in the Study proudly espousing a mix of housing types. This is further evidenced by the fact that you argue for sperate buildings for affordable housing but do not indicate where that will be. No doubt you are intending that they be in the area of the Western Distributor that you have already stated will suffer noise issues.
110-112		DCP 2012 requirements and the shadowing overlay map on p 111 clearly demonstrate the callous disregard that this Study shows for Pymont and its residents. The study constantly looks West and never East unless it is to solve an on-site problem.
119-120	Indicative Staging Plan	This Plan is extremely disappointing and will compromise the success of any development on the Fish market site for many years. It is a sell-out to commercial interests and clearly indicates that the Study is all about getting maximum economic benefit out of the current Fish market site and that anything else is peripheral and of little, no interest.
122	Promenade Width	Again, choice of Option 3 promenade width demonstrates: 1.the desire to squeeze as much money as possible out of the site and forsaking public open space for extra building space. 2. Caving into the commercial interests in Development Zone 8
125	Figure 55	Ignores the Light Rail Stop at John Street Square which would be an important access link for the northern p[at of the site.
126	Glebe Island Bridge	The statements at p126 are cursory and do not satisfy the requirement of SR3.6 to identify “how” the plan connects to the former Glebe Island Bridge as a possible future active transport connection to the Bays. Planning access to and through the site and ignore the significant opportunities offered by a future transport link that could significantly alter the situation cannot be “planning excellence”.
133	SR4.13 Noise & Acoustic Compatibility	<p>Your Study shows that the Hymix facility is not compatible with the proposed land uses – even ignoring the dust that Hymix creates yet the building planning studies show that proposed buildings are intended to be constructed so as to minimise the problem. Surely this is not acceptable. The Hymix site is a problem already for existing local residents from noise, dust and transport perspectives and will become even more of an issue when the current Fish market site is redeveloped.</p> <p>Hymix’s assertions that the facility is essential need to be seriously tested. I do not believe them. Hanson’s relocated to allow the new Fish market and construction in Sydney survived. The same would happen if the Hymix facility was forced elsewhere.</p>

182831

[redacted]

Ultimo 2007

Please see pdf file attached.

Thank you

20 August 2021

Infrastructure NSW

Re: Revitalising Blackwattle Bay Master Plan

Dear Sirs,

We have lived in Sydney all our lives and are proud to reside in Ultimo, within walking distance of the proposed revitalisation. As we looked across at the red-hued sunset from Fig Lane Park last night, we noticed the numerous towering cranes that pockmarked the splendourous vista, and wondered if in 7 years time we would even be able to see a sunset from here.

As the future rushes on and landscapes require enhancements, we are surrounded by families with young children, and celebrating new-borns in our neighbourhood. Even in these Covid19 lockdown times, we are a rapidly growing and thriving community. We are deeply concerned that the Master Plan may not be in the best interests or sympathetic to the nurturing of thriving communities.

We welcome the opportunity to provide feedback on the plan to revitalise Blackwattle Bay. Our comments and observations are outlined below.

Foreshore Public Space

We observe that public land, specifically water frontages, are highly valued by everyone for recreation and enjoyment. These foreshore areas should be kept as public open space, or where necessary built in the best interests of the community and the city and do NOT agree with the 10 metre wide promenade proposed is adequate, nor world class, as it is too narrow to adequately provide for the number and range of activities of people who use it and will use it in the future.

We strongly recommend that the foreshore promenade design must be set back enough for the anticipated amount of pedestrian and bicycle traffic, and should be predominately 30 metres wide with a minimum of 20 metre width in some places.

Trees

The beneficial qualities and value of tree canopies is scientifically and medically studied and proven. Urban heat and mental health impacts can be mitigated by biodiversity. Especially today, people looking up to majestic tree canopies exploding an array of vivid greens and birds in a world class Australian city waterfront walkway on a summer's day or winter drizzle feel connected to the land. Trees make it enjoyable to walk, play and explore. Australian trees and unique features are part of the tourist attraction.

Under this proposal few, if any, streets will have the sunlight or space required for good tree growth. We are concerned that the proposed revitalisation will be an arid wasteland akin to downtown Los Angeles, where the traffic pollution strangles all but the rat and ibis community.

We strongly recommend a greater emphasis on the unique Australian landscape that draws visitors to our foreshore.

Alignment with the Pyrmont Peninsula Place Strategy

The original plan boasts that the future renewal of Blackwattle Bay is "also consistent with the ten directions recently released by the NSW Department of Planning, Industry and Environment to shape the Pyrmont Peninsula Place Strategy". We emphasise the significance of a once in 100 year's opportunity to develop the waterfront and suggest that this proposal should not proceed before the Pyrmont Peninsula Place Strategy is finalised. The alignment with the Pyrmont Peninsula Place Strategy will ensure a collaborative voice of unified planning and development in the Peninsula area.

Buildings: Height and Form

We note that the rezoning proposes 12 building envelopes with towers of up to 45 storeys and lower buildings of 4-8 storeys.

We are concerned that the extraordinary building heights up to 45 storeys high is more than double the height of existing apartment buildings in Pyrmont and is inappropriate for the revitalisation. This would create wind tunnels and disastrous overshadowing as illustrated in the shadow diagram which clearly indicates that residences in the Wattle Crescent precinct, and in the Ultimo/Pyrmont precincts of Bulwara Road and Jones Street up to Fig Street will be in shadow for all but around 2 hours per day in midwinter.

As we have observed and experienced, Ultimo and Pyrmont has its own unique characteristics with a mix of terrace houses (some of them heritage listed), converted wool stores, and more modern residential and commercial buildings, and should not be made to conform to the building heights in Haymarket, Broadway, Barrangaroo and the CBD.

Furthermore, the proposed upper height limit does not align with the Pyrmont Peninsula Place Strategy, in particular Direction 2 which states "Any changes in building forms and public domain must be sympathetic to, or enhance, that character".

Overshadowing of Open Spaces and Buildings

We are concerned that this rezoning does not address overshadowing of existing dwellings south of Pyrmont Bridge Road (as illustrated in the shadow diagram), and in particular sunlight in new parks is restricted. Will these parks thrive with community activity and enjoyment in 10 years time?

Education Facilities

In 7 years Ultimo Public School, a newly built primary school, is expected to reach its capacity of 800 students. The obvious increase in high-rise dwellings will generate primary students in excess of that capacity.

The majority of Ultimo/Pyrmont public high school students attend Sydney Secondary College located on three campuses including the year 11-12 on Blackwattle Bay in Glebe. Within 7 years this campus may have to be repurposed and enlarged as a year 7-12 comprehensive high school. By that time as the 7-10 feeding campuses of the existing college (that are inconveniently located for Ultimo/Pyrmont students) in Balmain and Leichhardt will also be overfull with more local students.

We are dismayed that the report denies that the development will trigger demands for new schools. We strongly suggest that education needs must be addressed and that a new school be planned in the Ultimo Pyrmont Peninsula to cater for the increased demand in the years to come.

Social and Affordable Housing

We are concerned that the master plan for revitalisation does not take into account the ever growing numbers of homeless people and unemployment since Covid19 has shifted the scales of affordability and balanced communities. We strongly suggest that the master plan takes into consideration the City West model of setting rents according to their incomes which can help moderate financial support.

Furthermore, after the failure during the original grand plan to provide adequate housing in Ultimo and Pyrmont for nurses, police, teachers, ambulance, fire, delivery and community and city support staff (and in these contagious times - cleaners), the need to provide accommodation close to where such people are employed is greater than ever. In this, the most expensive city in the nation, these key workers require a far greater contribution. More will be required if private land must be purchased.


Developer Contributions

We also suggest that the developer contributions raised in Blackwattle Bay be reconsidered and dedicated to support infrastructure and affordable housing in the Pyrmont/Ultimo/Glebe/White Bay precinct.

We ask that you consider the thriving and ever growing communities that will be severely impacted by the current master plan, and hope that we can look forward to positive consideration of our feedback, and further engagement in community consultation in the development of Blackwattle Bay.

Your sincerely,


Ultimo NSW 2007


20/08/2021

183026

[redacted]

Pymont / Sydney

Submission file attached.

20 August 2021

Tjerruing Blackwattle Bay

Submission on Blackwattle Bay State Significant Precinct Study

Thank you for the opportunity to provide genuine feedback on the Blackwattle Bay State Significant Precinct Study.

We acknowledge planning scale at this level is significant for a Site, Particular Area of Interest, Local Government Area, District, Region, State, Nationally and Globally. As such our objections follow along with a call to Do Better!

Objections, considered feedback, concerns, proposals, and support for a number of features below with an evidence based approach.

Blackwattle Bay outdoor publicly accessible space must become greener. At present, the proposal offers up a deplorable minimum to protect the successful existing trees canopy's of the area, on and abutting the particular area of interest/site.

We are strongly opposed to the clearing/removal of the current successful mature tree canopy vegetation on the development site and adjacent to the study area. The current large canopy trees, native or not, are filled with a plethora of species, bats, flying fox and birds.

My daily morning pre-dawn/during dawn walk, includes being audience to the remarkable assembly of generations of small birds all singing as loud and well as they are able in the Ficus, Hills Weeping Fig trees which only have a 'Retention Value' of 'Consider for Retention'. These trees numbered 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38 and 39 run in a geographic straight line, at the rear of the current fish market, close to Anzac Bridge on ramp/Western Distributor. They are established despite the heavy pollution and are in good health, mature, high, and a genuine majestic thick canopy of Figs. Pre-dawn/during dawn and pre-sunset/during sunset literally schools of many small birds are competing in these trees.

Just on one day, at three different times during a space of 12 hours. I witnesses Ravens and Magpies perched and not moving any time soon, on the branches (all three visits) of the amazing, in good health, large Eucalyptus trees numbered 19, 21 & 22. These three Eucalyptus tress should not have a 'Retention Value' of 'Consider for Retention'. We ask that State Government retain these successful, majestic large Native trees. They are prime examples of Australian trees and obviously are magnets for Australian large birds.

The current mature trees surrounding the new Sydney Fish market, are an intrinsic part of the City of Sydneys public green space. Under this proposal the few offsets, where the State Government or Developers have suggested they will replace mature trees with X amount of new trees is flooded with obvious issues. The new trees are to be planted singularly in a lines or in little patches, even in between sky touching buildings in narrow alleyway wind tunnels, and beneath a major arterial road. With a lack of sunlight required for good tree growth. Or if the State Government only do the minimum they have too, the trees often never get planted and even if they do the wildlife from the removed mature trees is long gone/lost.

State, City wide and literally around this particular area of interest/site, we are losing trees at an alarming rate and the wildlife that live in them are competing for rapidly diminishing trees that are left. Once the wildlife is gone they won't return.

Australian magpies declined by 31 per cent in the East Coast region — including Sydney and Brisbane — between 1998 and 2013. Kookaburra's are declining faster.

These Magpies, Kookaburra's and Currawong to name some are excellent gatekeepers of our environment. They keep pests like mice and rats under control - Ultimo and Pyrmont has had ongoing issues with mice and rats for decades. Without these large birds we will upset the balance. Wildlife and trees are proven to improve mental health and that of children in their formation years.

We are fast heading toward leaving a legacy to our children and grandchildren void of wildlife.

Actions:

- Call for the Blackwattle Bay proposal to seize this once in our lifetime opportunity to show significant leadership on a National and International scale for the betterment of Mental Health and wellbeing for Sydney's current residents, workers, tourists and future generations. Increasing biodiversity / green spaces with tree canopy supports better mental health. Rising temperatures in cities have documented the links between heat exhaustion and mental health impacts
- The amazing, strong, large Eucalyptus trees numbered 19, 21 & 22 should not have a 'Retention Value' of 'Consider for Retention'. We ask that State Government retain these successful, in good health, majestic, large Native trees. They are prime examples of Australian trees and obviously are magnets for Australian large birds.
- The Ficus, Hills Weeping Fig trees numbered 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38 and 39 only have a 'Retention Value' of 'Consider for Retention'. These trees on the Blackwattle Bay site are host to a District or Diocese School Spectacular or Eisteddfod and Battle of the Bands all at once - It is an amazing twice daily bird singing festival! We ask that State Government to retain these Fig trees. As once wildlife from removed mature trees is long gone/lost they won't return.
- Blackwattle Bay outdoor publicly accessible space must become greener and improve air quality. These current tree canopy habitats need strong conservation to mitigate uncomfortable traffic pollution, urban heat (land & water), air pollution, destruction of animal viaducts/passageways and support foraging, breeding opportunities and the biodiversity of plant and animal species
- The City of Sydney needs to be the steward of Blackwattle Bay open park land. As our urban council is already using vegetation to help fight extreme heat in susceptible areas.
- Council does have excellent, highly educated staff, many with years of experience in open space and street tree planting. Some City of Sydney Council Staff are significantly expert in local ecology and commercial species: knowing which trees are available, when and where to plant them, and how much of council's budget needs to be stretched towards establishment watering (one to two summers in most areas). They are also strategic. They see that investment in trees now will bring big returns later and consider each park upgrade an opportunity to include more trees.
- In the first instance these mentioned trees should be retained. The worst case scenario should not be removal for these mentioned trees. Rather the City of Sydney Council in consultation with State Government work together to transplant the Eucalyptus trees numbered 19, 21 & 22 plus the Ficus, Hills Weeping Fig trees numbered 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38 and 39 that about the Western Distributor. As successfully occurred previously in Pyrmont's construction of the Jacksons Landing area. Where a number of mature Fig trees were relocated into new public spaces, Waterfront Park and Refinery Square. It can be done, it has been done in Pyrmont before, it should if need be happen again for the trees previously mentioned on the proposed Bank Lane area.
- We support the maximum number of habitat boxes to be included in the design code for terrestrial biodiversity. And low-spill lighting choices, near habitat vegetation to reduce disturbance to nocturnal animals.

Step up State Government and stop limiting and diminishing the City of Sydney’s residents and workers resilience against climate change, health and wellbeing.

We need to have a resilient City that at ground level plants thousands if not tens of thousands of diverse canopy trees and thousands of shrubs plus perennials belonging to hundred of species. Types of native plants that are salt and sun resilient plus in places offer visual appeal as seasons change.

Currently Blackwattle Bay’s planting plan lacks substance and is an embarrassment on a domestic level, let alone at a City, State, National or International attraction standard.

State Government we call for you to mandate state sites architects and designers to plan with vertical forest block buildings, buildings that incorporate garden terraces throughout and have plants cascading down all building sides.

Actions:

- ‘Tiny Urban forests could be a secret weapon against climate change and can be squeezed into new developments or along side roads. Japanese botanist Akira Miyawaki realised Japans woodland was largely non-native so he planted 1,700 pocket forests throughout Asia and the world. Europe is catching on with mini-forests being created by planting native species very close together. They grow 10 times faster than convention forests, generate 100 times more biodiversity and also store 40 times more carbon. The Netherlands has planted 85 Miyawaki forests, and 40 in Belgium and France. Density is the key, with a wide variety of native species required, which recreates the layers of a local natural forest. The young, open structure means sunlight can reach smaller plants. Which attracts local pollinators, butterflies, snails and amphibians and it is hoped the forests will form wildlife corridors, providing snacks for songbirds. Our city is facing a biodiversity crisis, with many species will be extinct within decades. Researchers have identified mass tree planting as a cheap and green way to lock carbon into the soil.’
- We have an expectation of urban renewal of tourist and local attracting parkland to include Australian bush foods and herbal medicine gardens, with community education available with ongoing funding. Medicine and Food is a way to take people through time to get an idea of how important the Sydney basin area is. “Australian Bush foods have high nutrient level when compared to global standouts.” (2) Blackwattle Bay with the new Sydney Fish Market and terrific Sydney restaurants need a neighbourhood Australian Bush food and herbal medicine garden. Evoke memories and return economy.
- For building design to actually promote health and wellbeing with natural ventilation when significant sources of noise and air pollution are a stones through away from heavy vehicles roads and batching plant in uncomfortable wind environments and overshadowing. State Government needs to look at Cairo’s new administrative capital area which shows exemplary planning, is future smart, focuses funds devoted to trees and plants as they will ensure air to be cleaner around the vertical forest, the buildings will provide their own energy and greenery will add insulating features. The Egyptian property developer MISR Italia Properties has previously designed building forests in Albania, the Netherlands and conceptual models for Mars.



Cairo’s new administrative capital area (3)

- Sydney’s Blackwattle Bay could be the face of Australia’s challenge on climate change and our Nations ecological reconversion. A minimum of 50% open space needs to be mandated.

Call for Blackwattle Bay proposal to seize this once in our lifetime opportunity to show significant leadership on a National and International scale for the betterment of Mental Health and wellbeing for Sydney's current residents, workers, tourists and future generations.

- Increasing biodiversity / green spaces with tree canopy's supports better mental health.
- Rising temperatures in cities have documented the links between heat exhaustion and mental health impacts.
- Trees make it cool to walk, run or ride, and sit beneath, all of which are good for mental health.
- Feeling restored and alert. As the vibrant colours, natural shapes and textures, fresh aromas, and rustling of leaves in the breeze all provide you with effortless distraction and relief from whatever it was you might have been thinking about, or even stressing over.
- Studies back this up, demonstrating 'walks through green space have been shown to reduce blood pressure' (4), improve mental acuity, boost memory recall, and reduce feelings of anxiety. The Japanese have a name for this type of experience, shinrin-yoku.
- Some research has found that tree cover, rather than green space more generally, is a predictor of social capital. Social capital, refers to the social networks and the associated norms of reciprocity and trustworthiness that may have important influences on our life chances and health.
- Green spaces with tree canopy are settings where communities can come together to watch birds and other animals, which can also be catalysts for new conversations and developing feelings of community belonging in the neighbourhoods where we live ... just ask dog owners.
- The preference is for green spaces with more complex/biodiverse more complex vegetation (not monoculture planting), such as parks that mix grass, undergrowth planting with tree canopy.
- Without tree canopy to shield from the midday sun, this may increase the likelihood of people using cars for short trips instead of walking through a park or along a footpath. The result is missed opportunities for physical activity, mental restoration, and impromptu chats with neighbours

Actions:

- Urban designer have a significant role to play in lowering the rates of mental illness and the data on how nature affects our brains are central to changing the way this Blackwattle Bay Precinct Study can to better!
- We acknowledge strict compliance regimes for roads, powerlines and underground utilities are needed. However, a recent report by the Greater Sydney Commission singles out urban heat as one of the four priority areas given our coming climate. Shade can be a lifesaver in heatwaves and all urban authorities plus all levels of Government, Council and Private owners, need to use vegetation and tree canopy's to help fight extreme heat. And urban forests can mitigate the urban heat island effect and significantly lower surface soil, water and ambient air temperatures.
- 'In our latest study, we asked if more of any green space will do? Or does the type of green space matter for our mental health? Our results suggest the type of green space *does* matter. Adults with 30% or more of their neighbourhood covered in some form of tree canopy had 31% lower odds of developing psychological distress. The same amount of tree cover was linked to 33% lower odds of developing fair to poor general health. We also found poorer mental and general health among adults in areas with higher percentages of bare grass nearby' (5)
- 'Engagement with nature is an important part of many people's lives, and the health and wellbeing benefits of nature-based activities are becoming increasingly recognised across disciplines from city planning to medicine. Despite this, urbanisation, challenges of modern life and environmental degradation are leading to a reduction in both the quantity and the quality of nature experiences. Nature-based health interventions (NBIs) can facilitate behavioural change through a somewhat structured promotion of nature-based experiences and, in doing so, promote improved physical, mental and social health and wellbeing.' (6)
- 'Since October 5, doctors in Shetland, Scotland have been authorized to prescribe nature to their patients. It's thought to be the first program of its kind in the U.K., and seeks to reduce blood pressure, anxiety, and increase happiness for those with diabetes, a mental illness, stress, heart disease, and more.' (7)
- 'A growing body of empirical evidence is revealing the value of nature experience for mental health. With rapid urbanization and declines in human contact with nature globally, crucial decisions must be made about how to preserve and enhance opportunities for nature experience.' (8)

- ‘Engagement with nature is an important part of many people’s lives, and the health and wellbeing benefits of nature-based activities are becoming increasingly recognised across disciplines from city planning to medicine. Despite this, urbanisation, challenges of modern life and environmental degradation are leading to a reduction in both the quantity and the quality of nature experiences.’ (9)
- ‘Growing urbanisation is a threat to both mental health and biodiversity. Street trees are an important biodiversity component of urban green space, but little is known about their effects on mental health. Here, we analysed the association of street tree density and species richness with antidepressant prescribing for 9751 inhabitants of Leipzig, Germany. The study suggests that unintentional daily contact to nature through street trees close to the home may reduce the risk of depression, especially for individuals in deprived groups. This has important implications for urban planning and nature-based health interventions in cities.’ (10)
- ‘The United Nations General Assembly created the United Nations Sustainable Development Goals (UN SDG) to improve the quality of life for people. These broad goals outline the greatest challenges of our time. An effective strategy to assist in meeting these goals is to plant and protect trees, especially in cities where the majority of people live. This paper serves as a critical review of the benefits of trees. Trees promote health and social well-being by removing air pollution, reducing stress, encouraging physical activity, and promoting social ties and community. Children with views of trees are more likely to succeed in school. Trees promote a strong economy and can provide numerous resources to the people that need them. While cities are getting hotter, trees can reduce urban temperatures. They provide habitat and food for animals. Finally, trees are valuable green infrastructure to manage stormwater. Money spent on urban forestry has a high return on investment. The overwhelming evidence from the scientific literature suggests that investing in trees is an investment in meeting the UN SDG, and ultimately an investment for a better world.’ (11)
- ‘The most promising environmental and health impacts of urban trees are those that can be realized with well-stewarded tree planting and localized design interventions at site to municipal scales. Tree planting at these scales has documented benefits on local climate and health, which can be maximized through targeted site design followed by monitoring, adaptive management, and studies of long-term eco-evolutionary dynamics.’ (12)
- A study of Residential proximity to major roads and term low birth weight: the roles of air pollution, heat, noise, and road-adjacent trees concluded: ‘An increased risk of term LBW associated with proximity to major roads was partly mediated by air pollution and heat exposures.’ (13)
- Under this proposal the Government working with the City of Sydney and Community, must prioritise the expansion of public green space diversity. Large canopy trees are a welcomed relief against hard surfaces, glass structures and large advertisements all competing for attention in the public domain. People looking up to majestic tree canopies exploding an array of vivid greens and birds in a world class Australian city waterfront walkway on a summer's day. Trees make it cool to walk, run or ride plus sit beneath, all of which are good for mental health. ‘Those who do not find time every day for health must sacrifice a lot of time one day for illness’ Father Sebastian Kneipp.

NSW Government’s Blackwattle Bay proposal’s infrastructure contributions are anti-community and anti-local residents next-door to major developments.

The infrastructure contributions as they currently stand, ensures developers can continue to carve up the spoils of growth while minimising their obligations to the communities they disrupt. Leaving council trying to tackle and pay for the flow-on impacts of huge new developments. Rate-pegging should cease as it sets an arbitrary limit to raising funds and is a barrier to investment in local services and allows developers to forgo investing into the community and residents are negatively impacted by massive developments.

Action:

- Review NSW Infrastructure contributions looking to implement a levy to share land-value windfalls that are created by new development decisions.

Shiny new overly tall and wide buildings do nothing to address the problem of increased pressure on the City of Sydney residents. The Blackwattle Bay area needs to do better! As there is an increased and desperate need for more open spaces and tree canopy spaces to better support the people that are the glue for our City - nurses, police, paramedics and teachers, all overworked and underpaid.

We reject the rezoning proposed towers of up to 45 stories, more than double the height of existing apartment buildings in Pymont and is inappropriate for the revitalisation. The 12 building envelopes will create adverse wind tunnels and overshadowing for people and planting.

The city and Country relies on its core workers, many of which reside in the Pymont Peninsula and work in adjacent employment centres, in Sydney's CBD core as well is close by health and education institutions. The overwork and underpaid army of our City's carers, do not need Blackwattle Bay to become a Harbourside version of Pitt Street Mall or Barangaroo where semi-private space is overwhelmed by adjacent retail and hospitality precincts. Wentworth Park is already pushed for space to share with Ultimo, Pymont, Glebe residents plus the Ultimo School, a pop up school and the Greyhound race track. The Blackwattle Bay proposal does not address the provision for more or better activated public spaces, liveability, productivity, good public transport connections or sustainability in the area.

Actions:

- The upper height building limits must align with the Pymont Peninsula Place Strategy, in particular Direction 2 which states "Any changes in building forms and public domain must be sympathetic to, or enhance, that character."
- Affordable Housing developer contributions should be used to provide such accommodation and more, better activated public spaces, within the Pymont Peninsula not elsewhere in Sydney or NSW.

This Blackwattle Bay proposal mandates over development, overwhelming traffic, poor amenity and lack of public spaces, it does not support the realisation or health and well-being of an Emerging Technology and Harbour City Innovation Corridor.

More imposing high-rise development and the majority of allocated public space on an enormous waterfront site is staged to be underneath a highway overpass, bombarded by traffic noise, smacked by high winds due to wind tunnels, permanently in shade and beneath air pollution drop. This is not the way to attract and deliver connected and prosperous business to what is to be a Harbour City Innovation Corridor.

Actions:

- Public access to great quality green open spaces and blue open spaces, access to morning and afternoon sunlight, a peninsula of mature tree lined streets and plentiful biodiverse green pockets of tree canopies will support high value knowledge-based jobs, generate a successful neighbourhood of long term corporate stayers, economic growth, tourism and mentally healthier residents.
- Add improved walking and cycling connectivity to a cohort of great public water services, metro, light rail and EV charged public mini busses to ensure the peninsular is entirely accessible by public transport will be an exemplar to other Australian cities. And be honey for global corporate technology and innovation giants plus tourists to be drawn to.

Blackwattle Bay should not be rezoned (through the SSP process), it should not be a Public authority precinct, or managed by the NSW Government.

As it currently stands this proposal shows little to no respect for Place Strategy requirements for residential health, wellbeing, comfort and safety. The Pyrmont, Glebe and Blackwattle Bay residential community should not be compromised by a 24 hour precincts noise from traffic and transport or community and commercial events in the public domain. Which as per this proposal are to be held, exempt from requiring approval.

This gross misuse of public land is clearly designed to delivery event profits to State Government with minimising their obligations for the health, safety, comfort and wellbeing of community, open parkland, open water, or direct residential neighbours they disrupt. Leaving council trying to tackle and pay for the flow-on impacts of huge events and parties.

This proposal is to be held accountable for respecting the peninsular community of Pyrmont, by way of educating locals and visitors to its past, present with meaningful signage.

The current plans are a design failure for Sydney, Nationally and Internationally. With a world-class harbour foreshore walk planned to be thin slivers of public walkways by the water that will be wind tunnelled, overshadowed and human scale towered over by blocks of towers.

In a global warming crisis, this proposal fails to address the urgent need for sustainability which should be a top priority.

Where is the community signage making it easier to move around, an element of Direction 7. This proposal continues current signage pointing only to parking stations, The Star, the Fish Markets and Darling Harbour.

Actions:

- City of Sydney should be the authority and management of Sydney Public Spaces. The community must be consulted before any plan for the distribution of contributions is finalized and the agreed with the City of Sydney and the Pyrmont, Glebe & Ultimo communities.
- For this proposal to deliver a high amenity, highly walkable and safe space, open space development needs the installation of CCTV cameras as a deterrent. Ensuring the safety and security of residents workers and visitors to the area and enable improved investigation of bad behaviour. Additionally, Pyrmont needs the reinstatement of a Police station, preferred location, being at the Pyrmont Metro station.
- We recommend the inclusion of Welcome to Pyrmont signs, with knowledge sharing signs: Historical maps with European buildings and changes in waterline, creeks and uses, Industrial Heritage, Community Centre, Parklands, local Maritime information, local Aboriginal culture, story and history, stories of Country, Fire Station, Flora and Fauna of the Area. By working with local Aboriginal groups and community groups.
- Support for the area to be renamed, Tjerruing Blackwattle Bay.
- We request the Government ensure a minimum of 50% open space is mandated.
- We propose the Blackwattle Bay site installs Australian bush foods and herbal medicine gardens, with community education available with ongoing funding from Tourism. Medicine and Food is a way to take people through time to get an idea of how important the Sydney basin area is. Australian Bush foods have high nutrient levels when compared to global standouts. Blackwattle Bay with the new Sydney Fish Market and terrific Sydney restaurants need a neighbourhood Australian Bush food and herbal medicine garden.
- What this Community, Sydney City, the East coast of Australia needs is a visionary approach to foreshore management that priorities public access to the Bay (land and water) and replicates the success of the four Glebe Foreshore Parks and not another Chatswood by the sea. Additionally, a foreshore walk that is predominantly 30m wide compared to the 10m proposed.

- Trees make our city more beautiful and liveable by providing cleaner air, reducing heat and creating habitat for wildlife. Retain the Eucalyptus trees numbered 19, 21 & 22 plus the Ficus, Hills Weeping Fig trees numbered 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38 and 39 that abut the Western Distributor.
- Safety by Trees, a lesson for Blackwattle Bay safety for our Urban developers, Government and Council needs to include: 'Urban green spaces have been shown to benefit residents' physical and mental health as well as strengthen social ties. Some studies have found that presence of vegetation also might reduce crime. We examined whether an association exists between two forms of green space—(1) tree canopy and (2) public parks—and crime rates in the city of Chicago. Using publicly available data, we calculated percent tree canopy, percent acreage parks, and crime rate for assault, battery, burglary, homicide, narcotics, and robbery between years 2009–2013 for each of Chicago's 801 census tracts.' Results showed 'An inverse association was found between percent tree canopy and crime rates for assault, battery, robbery, and narcotics.' (14) Which highlights Highlights, a 10% increase percent tree canopy was associated with 10.3% decrease in battery rate. And 10% more tree canopy was associated with 11.3% less assault, robbery, narcotics.
- We propose the Blackwattle Bay site and adjoining New Sydney Fish Market shared a Publicly Visible Tree Removal Register for this area. Such a register will mitigate oversight and so avoid corruption, so agencies cannot hide behind each other when it comes to tree removal. We see the register maintained by City of Sydney. This register would show: The location, type and size/maturity of the tree. Accountability, by naming who, be it corporate or one of the many government sub agencies/departments and contractors is requesting the tree removal. Do Note: There are a plethora of sub contractors doing this work. The chain of approvals. City council tree removals, currently needs to place a notice on a tree 14 days prior to removal. They already have their own internal database which has all these details of the 32,000 trees in Sydney. Since they already attach the 14 day notice to trees we are not asking for anything that is not already done. We simply want this data online. This way we increase transparency and due diligence to the process. Some may argue that attaching removal notices to trees gives local residence proper notice. In the current times of lockdowns this is not always the case. Residence could be locked down and some may not feel comfortable venturing outside or as per health advice, they stay at home. In any case being able to see the details online is very important and a logical progression. Just like watching City Council meetings online and not going into Town Hall House. If an objection is lodged or a request for further information the tree removal should be delayed until the issues have been addressed. There should also be an option for residence to seek a second opinion from an independent arborist. The process would be online is very easy to track and transparent.

Thank you for accepting feedback, we look forward to engaging in community consultations going forward for the development of Blackwattle Bay area. We genuinely hope you and your team find the time for a pre-dawn to visit the current Fig trees along Bank Lane /Western Distributor area, previously mentioned and enjoy the symphony of diverse birds in this tree canopy green space to support better mental health.

Regards

We do not give permission for our names or any personal details to be disclosed.

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163431

[redacted]

Pyrmont & 2009

I have uploaded my submission and would be grateful if you reviewed and took it into consideration .

If my upload has not been successful please reach out as I am keen for my submission to be considered.

Regards

[redacted]

[redacted]

Submission on Blackwattle Bay State Significant Precinct Development

To whom it may concern

I wish to provide a number of material concerns and issues around his proposed development and would be grateful if they were taken into consideration.

Pymont is not the CBD or Barangaroo.

Pymont is not the CBD and is not an extension of Barangaroo. Its current village like ambiance and low rise environment appears to complement its location and topography. This development should be in sympathy with Pymont- its history and previous good planning.

PPPS

I am confused why this development does not align to the Directions of the Pymont Peninsula Place Strategy and in particular Direction 2.

More so – why has this development not waited till the PPPS is released later in the year – surely one of the past criticisms has been the piecemeal approach to development – the PPPS was attempting to set an overarching strategy. This development appears to be piecemeal and should await the PPPS release.

Master Plan

This development needs to follow due process and establish a Master Plan to provide certainty and transparency such as required for The Star Key site. If this development is perceived as a world class extension to the new Fish Market building then please ensure it establishes and consults around a master plan.

Social Infrastructure

All developers should pay a social infrastructure levy that is used directly towards improvements in Pymont –e.g. redevelopment of Maybanke Community Centre and or a Police Station and necessary costs associated.

Towers, building scale and closeness of the podiums.

The towers are too close to the harbour and are way too tall. I also consider the podiums to be too bulky. The towers will cast shadows widely impacting Pymont residential and public space amenity and reaching as far as Glebe.

Additionally and of material concern is the podiums that are too close to each other – this will also impact wind, sun access and also increase noise.

Proximity to Anzac Bridge

I object to buildings being so close to Anzac Bridge and even more so when they are envisaged as residential. This represents a health hazard as this major roadway should not have residential towers so close.

Wind and Sun

The current build form will materially change this area and will create significant over shadowing and shading of Blackwattle Bay as well as the new Fish Markets and due to the sheer scale and height of these buildings will create wind tunnels, as experienced elsewhere in Pymont.

Community Engagement

In particular and having established a master plan, the community should be genuinely engaged at the commencement of detailed planning to ensure areas such as promenade board walk, parks, affordable housing, transport and social infrastructure. All current concerns by the community are being ignored as expressed in several surveys – this should not happen and genuine input as well as necessary compromise should occur to establish a master plan. Jacksons landing appeared to follow a master plan and is an excellent successful example.

As an example – a promenade of only 10 metres in parts is not wide enough particularly based on existing foot traffic around Pymont.

Schooling

Wentworth Park should be seen as an opportunity to build a school campus in support of the 1600 families who are envisaged to live in this new area.

Health and Safety

There is nothing in these documents that considers the health of the existing community or that of the increased population. More so there is no consideration for increased levies especially to pay for additional police or other first responders.

I also ask that CCTV be installed that can be used by the City and Police as well as adequate lighting within parks again for safety and security.

Overall Disappointment

Sydney is a wonderful city with a beautiful harbour and this proposed development is a poor example of how we should plan and grow our city. The scale, density and dismissive approach to planning and the existing local residents and community needs is beyond disappointing.

Recommendations

I ask that **all my key issues above are included in significant changes to the existing documents** and approach to this once in a generation planning opportunity.

I am happy to discuss and expand on any of my comments above.

Regards

[Redacted signature]

182121

[redacted]

2000

Submission file attached.

20 August 2021

Attn: Ms. Alex O'Mara,

Deputy Secretary, Place, Design and Public Spaces
Department of Planning, Industry and Environment,
Locked Bag 5022,
PARRAMATTA NSW 2124

Dear Ms. O'Mara,

RE: BLACKWATTLE BAY STATE SIGNIFICANT PRECINCT STUDY

This submission is made on behalf of the Mirvac Group. In addition to the below, Broadway Shopping Centre is also making a separate submission on behalf of the centre.

Thank you for the opportunity to make a submission on the exhibited Blackwattle Bay State Significant Precinct Study (**Study**). The Study represents a highly sophisticated proposal for the precinct and the Department of Planning, Industry, and Environment (**DPIE**) should be commended for the comprehensive approach taken to the rezoning plan of the Blackwattle Bay precinct.

Mirvac supports the principles and objectives of the Study including:

1. The proposed mix of commercial, retail, open space, and residential uses.
2. The proposed area staging.
3. The orientation and location of residential density.

The proposal is a clear and succinct example of good planning and lends itself to great urban design outcomes. The mix of public open areas, retail activation, commercial space, and residential density will ensure the future vibrancy of the area from a tourism, job creation, economic growth, and liveability perspective.

Through future investigation phases of the Study, Mirvac respectfully suggest that some additional consideration be given to the following minor items.

Contributions

Mirvac respectfully requests clarity on any additional infrastructure contributions beyond the existing City of Sydney statutory contribution framework, if proposed, and outline a specific framework for how they are to be paid/delivered. If this is via a VPA, then the works and cost associated with construction and dedication would need to be further investigated.

Affordable housing contributions for the precinct are to be calculated based on *total floor area* or *gross floor area* of residential at a rate of 5%. The Explanation of Intended Effects (EIE) and

the Housing Diversity and Affordability Study (HDAS) are conflicted in their explanation between gross floor area and total floor area.

The EIE outlines that the quantum of the affordable housing financial contribution rate is yet to be determined. The HDAS assumes that the current rate of \$3,987.50/sqm is to be applied. Mirvac requests clarity on this matter as it has a significant impact on assumptions made in feasibility studies.

Car Parking

The proposed car parking allowance for the precinct is sought to be reduced from the Category B maximum parking rates to the Category A maximum parking rates. Mirvac requests City of Sydney LEP Category B rates apply given the context of the site, distance from mass transit, and precedent from other developments in the area.

Timeline

Clarity on the proposed staging and timeline for the precinct as identified in the Urban Design Statement is beneficial. Mirvac request more detail on the proposed time frames for all planning processes to completion of rezoning.

We would welcome the opportunity to discuss the above items further with you.

Yours sincerely,

A handwritten signature in black ink, consisting of a stylized 'R' followed by a star-like flourish.Two thick black horizontal bars redacting contact information, likely a phone number and an email address.

182136

[redacted]

2000

Please find attached on behalf of [redacted].

ETHOS URBAN

Poulos Bros. Bank Street

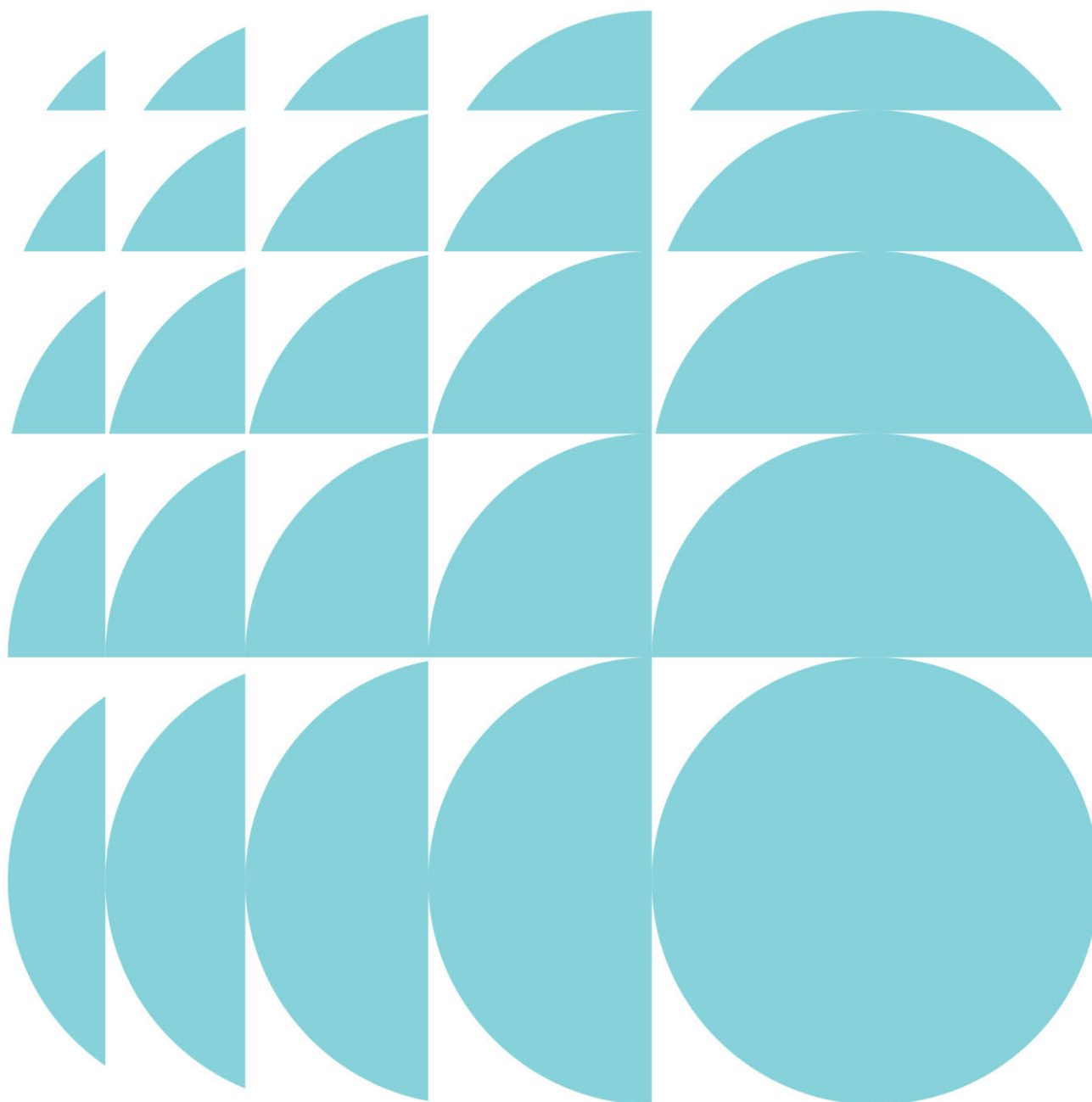
21-29 Bank Street, Pyrmont

Blackwattle Bay SSP - Submission

Submitted to NSW Department of Planning,
Infrastructure & Environment

On behalf of Poulos Bros.

20 August 2021 | 15695



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Ethos Urban
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Renzo Tonin
- D** Air Quality Assessment
RWDI

1.0 Executive Summary

This submission has been prepared on behalf of Poulos Brothers Seafood, a private landowner in the Bays Market District, who have been working closely with Infrastructure NSW ('INSW') since 2017 on the redevelopment and renewal of this strategically important land.

Poulos Bros have worked closely with INSW (formerly Urban Growth NSW) over the last five years on the master planning of the precinct. Their position has not changed - redevelopment needs to be commercially viable to facilitate a relocation to an alternate site in reasonable proximity to the new Sydney Fish Market. To date the proposed reasoning does not facilitate a relocation of Poulos Bros.

Specifically, the key concerns are:

- Structure planning: the height limit on the Government Site is over 140m, whereas the private landowners is nearly a third of that at 50m. The Government land is proximate the key road infrastructure, the light rail, and the key activity node of the Sydney Fish Markets. The land is far better suited to accommodate commercial uses than the private land holdings.
- The building heights allocated to the sites are inequitable and are inconsistent with the design principles established early in the process. There is little evidence to support the significantly lower heights on the private landholdings than that of the current Fish Markets site.
- INSW have taken an 'equitable FSR' approach across all sites. This is not a sound planning and design approach. FSR is a final output of a design process
- The FSRs proposed are retrograde, and less than the comparable sites in Jacksons Landing – which were master planned in the 1990s.
- The land use mix proposed is unfeasible. The proportionately high non- residential FSR in this location has not been tested from a viability perspective, nor has it considered the delivery of commercial floor space in the remaining Pyrmont Peninsula and wider Sydney CBD, is not commercially viable..
- The SSP sets prescriptive controls based on questionable assumptions. Independent air and noise assessments show that there is little basis for the land use mix and design outcomes that have been prescribed.
- As a result of the above, we question the ability of this site – a key site in the context of the urban renewal precinct that connects the Fish Market precinct to the important headland park – to be redeveloped and therefore enable the delivery of the Big Move 1 of the Draft Pyrmont Peninsula Place Strategy (July 2020) to *“secure the final links of the Sydney Harbour foreshore link at Blackwattle Bay and Darling Island”* and deliver a *“World Class Harbour Foreshore Walk”*.

The site presents an opportunity for urban renewal in response to the strategic direction for new housing and jobs within a '30-minute city' as established by the GSC and DPIE. Further, this site holds high strategic value; positioned adjacent to Blackwattle Bay and the future open space proposed in the Plan – being the last private landholding on the western part of the land that forms the Bays Market District. To enable this, we seek the following amendment to the SSP:

- Reduce the quantum of non-commercial floor space to refocus the Government site for the main delivery of commercial space.
 - It is considered that a minimum requirement of 2-3 storey of non-residential uses to provide for possible street level activation such as food and beverage as well as two levels of local employment, business or maritime related uses is suitable.
- Delete specific maximum GFA requirements.
- Reconsider building height to allow buildings up RL90 (30 storeys) akin to the Jacksons Landing RLs and more balanced with the Government lands.
- Delete specific built form provisions as they relate to the shape and form of the buildings.

2.0 Introduction

This submission has been prepared by Ethos Urban on behalf of Poulos Bros, owners of the site at 21-28 Bank Street, Pyrmont. The site context and comprised lots is illustrated in **Figure 1** below.

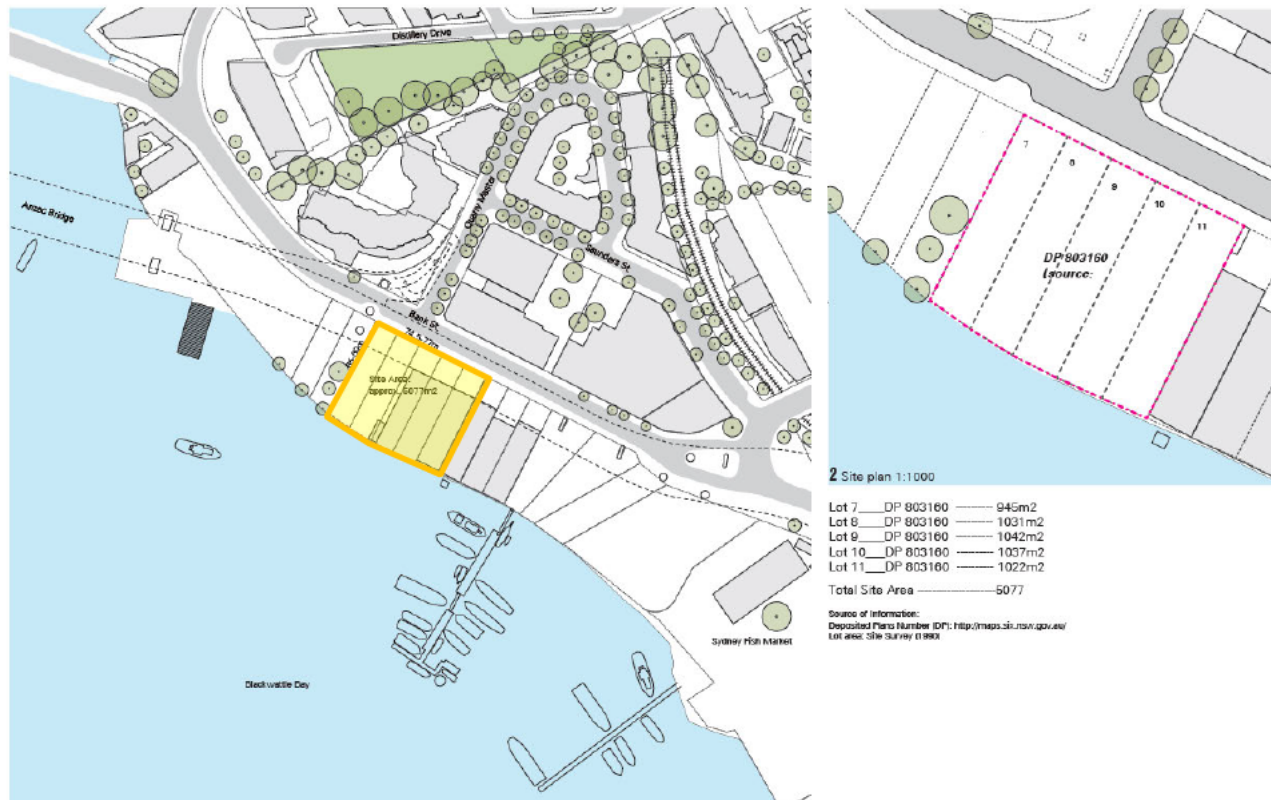


Figure 1 Site context
Source: Ethos Urban

Poulos Bros welcome the release of the State Significant Precinct after over five years of engagement w INSW. They seek to work with the DPIE in finalisation of the rezoning to ensure that 5 years of planning does not amount to nothing – and the plans realise the latent opportunity for this Poulos Site.

2.1 Background to Poulos Bros

Poulos Bros. Group is a family owned and operated business established in 1967. Their operations have been primarily based at the Bank Street site when it was purchased in 1985 prior to the construction of the Anzac Bridge. The Poulos Bros Group business includes:

- Headquarters and distribution centre at the Bank Street site;
- Two wholesale operations in the Sydney Fish Market; and
- A processing and distribution centre in Brisbane and Melbourne.

The business is among the largest independent wholesaler of fish in Australia, operating a fleet of 30 vehicles with around 150 vehicle movements daily. It is a major contributor to the local economy, supplying to restaurants, hotels and the casino in Sydney’s CBD and employs over 100 people on site. Poulos Bros operate at the Bank Street site as they rely on access to the harbour foreshore and the surrounding arterial road network to distribute supplies.

Importantly for the context of this submission, Poulos Bros. are a shareholder in Sydney Fish Market Pty Ltd and as such, the synergies between the Bank Street site and the Fish Markets for the group are considerable. There is strategic benefit in Poulos Bros being at the site and as such, the viability of any redevelopment of the site must consider the significant sunk costs of relocating their operations away from this Precinct. However, Poulos are mindful of the impact to operations that will result in the wider renewal of the area.

3.0 Background

Various documents have been released over this period guiding a development vision for the area which is now known as the Bays Market District. Poulos Bros have been involved with the Urban Growth and Infrastructure NSW planning process for a number of years.

Throughout the process of planning for the wider Bays precinct, plans prepared by the INSW / Urban Growth have changed little as they relate to the Poulos site since the original concept was presented in 2017. However, the site's context has.

The strategic direction for growing a Global City established by the GSC has evolved greatly since this time – as outlined in the Eastern City District Plan. In addition, the DPIE have released the Pyrmont Place Strategy which seeks to “*plan for the continuing evolution in ways that maximise its economic and social potential, while protecting the area’s unique heritage, liveability and long-term sustainability*”.

Pyrmont Peninsula was identified in the 1988 Central Sydney Planning Strategy as a suitable place for mixed residential and commercial uses. In the late 1990’s, the Pyrmont peninsula underwent significant urban renewal of the former working harbour.

The City West Development Corporation was constituted in 1992 under the Growth Centres Act to redevelop 300 Ha of land, funded through the Building Better Cities Programme whereby the overall purpose was “*to promote improvements in the efficiency, equity and sustainability of Australian cities*” and critically, the objectives were economic growth, ecologically sustainable development, improved urban environments and more liveable cities. The Commonwealth Government provided around \$816 million towards the program between 1991 and 1996 to meet these objectives. The area resulted in a substantial increase in the local population through the delivery of high-density residential buildings. It was clearly a residential precinct, proximate the Global CBD of Sydney.

Since this period, planning for the subject site and wider Bays precinct has evolved over time with the NSW Government creating greater focus on the strategic direction of Global Sydney. In addition, these lands are unique: underutilised, urban fringe lands that are part of a greater urban renewal focus for the NSW State Government.

3.1 Blackwattle Bay Precinct Planning Process (INSW)

In June 2020, after three years of engagement with Infrastructure NSW and the steering committee including the City of Sydney, Poulos Bros made a submission to the draft Precinct Plan.

The submission acknowledged the works to date, and welcomed the collaborative, place-based, approach to deliver a solution that responded to the site’s potential that was appropriate in both local and state contexts – particularly in light of the work by the DPIE on the Pyrmont Peninsula Place Strategy and broader city-shaping work by the GSC that reinforces the Sydney CBD as Australia’s only Global City. Further, Poulos Brothers agreed with the vision for the site as a vibrant, mixed use precinct, however, believed that the Precinct Plan did not go far enough on many aspects. Their concerns were:

- A strategic opportunity lost. the Bays Market District is part of a broader Bays Precinct renewal and part of the Pyrmont Place strategy which is currently under consideration for greater renewal and redevelopment in the Precinct. The Precinct Plan should consider the site in its context – which will likely consider high rise redevelopment of lands further west of the Precinct at Glebe Island and Bays West. Building Heights should not be scaled down to the west and should consider 30+ storeys for the entire precinct.
- Adhere to the principles established and endorsed by the Project Working Group and stakeholders in the initial stages of the project. Critically, there was never a principle based on ‘FSR equity’ – which clearly benefits the Government site. The key design objective as it related to height was based on “*minimise additional overshadowing to Wentworth Park and the Glebe Foreshore in mid-winter*”. This would allow buildings far greater than that currently envisaged.
- Building Heights: in addition to the above, the plan now references the pylon for Anzac Bridge as a height datum. This has never been an established principle and is immediately flawed when considering the heights of buildings already established in Jacksons Landing to the immediate north. The established principle of Glebe

Foreshore solar access should drive building height. We are of the opinion that 35+ storeys at these sites is supportable.

- Floor Space Ratios and proposed land use mixes do not appear to be justified with any supporting market commentary. Particularly in the current economic context, flexibility in design and land use mix should be sought if the Plan is to be an achievable one.
- Commercial floor space: again, there seems little in terms of justification for the quantum of proposed commercial floor space. In light of the Poulos Brothers site that is the furthest from the only public transport and allied key activity node of the Fish Markets site, we believe there is little justification for this level of non-residential floor space.
- Establish an Infrastructure Contributions plan or framework to aid in the funding of critical infrastructure such as the Metro West and other key transport initiatives.
- Formalise TfNSW's position for Sydney Metro West's future presence within Pyrmont, mindful of TfNSW's plans for improved multimodal transport connectivity to the precinct, including light rail, ferries, buses, and active transport with a specific focus on the role of a future Metro West project and station in Pyrmont. This Plan provides the opportunity to consider and pursue wider reforms in terms of public transport and accessibility for the Peninsula.
- Consider Pyrmont more broadly as a State Significant Precinct, whereby development of a specified capital investment value (i.e. \$10 million) is classified as State significant development under *SEPP (State and Regional Development) 2011*.
- Finally, Poulos Bros. are a shareholder in Sydney Fish Market Pty Ltd and as such, the synergies between the Bank Street site and the Fish Markets are considerable. Therefore, the viability of any redevelopment of the site must consider the significant sunk cost – and opportunity costs of additional transportation and operation costs of relocating their operations away from this Precinct. At present, the redevelopment metrics for Poulos do not 'stack up'.

It is evident from a review of the above in light of the comments in the following sections that despite years of engagement – little has changed.

3.2 The Pyrmont Place Strategy (DPIE)

The draft Pyrmont Peninsula Place Strategy, released in December 2020, established a clear vision for Pyrmont Peninsula:

In 2041, the Pyrmont Peninsula will be an innovative, creative and cultural precinct and an engine room of the Eastern Harbour CBD. It will connect to the Innovation Corridor and other innovation and job precincts via Sydney Metro and complement the Sydney CBD.

The 10 Directions identified to guide growth to 2041 had the intent of addressing matters of strategic economic, social and environmental significance in the Pyrmont Peninsula are all supported. These are supplemented by 5 Big Moves that are seen as broader and more strategic in their delivery that are again supported at a high level.

The Poulos Bros site is located in the Blackwattle Bay sub-precinct. In response to the strategic directions established by DPIE, Poulos Bros raised the following concerns, which are still held.

3.2.1 Big Move #1 and Strategic directions for a harbour foreshore walk

Under Big Move 1, DPIE focuses on achieving “a world class harbour foreshore walk”. As the most western lot in the Blackwattle Bay area immediately adjacent the future open space, achieving a continuous harbour foreshore walk will require access to the Poulos Bros site, otherwise the vision cannot be achieved.

Urban renewal of the Poulos Bros site, including the delivery of a harbour foreshore walk, will increase visual and physical links to the wider Bays precinct and Sydney Harbour, enhancing connections to nearby residential locations, widening access to the labour catchment and a strategic opportunity for the Innovation Corridor. It will also create immense tourism benefits for the NSW Government and the local economy.

As shown in **Figure 2**, should redevelopment of the Poulos Bros site not occur, any hope of a continuous and connected harbour foreshore walk may not be achieved. If a feasible outcome is not reached, Poulos Bros will continue to operate at the site.

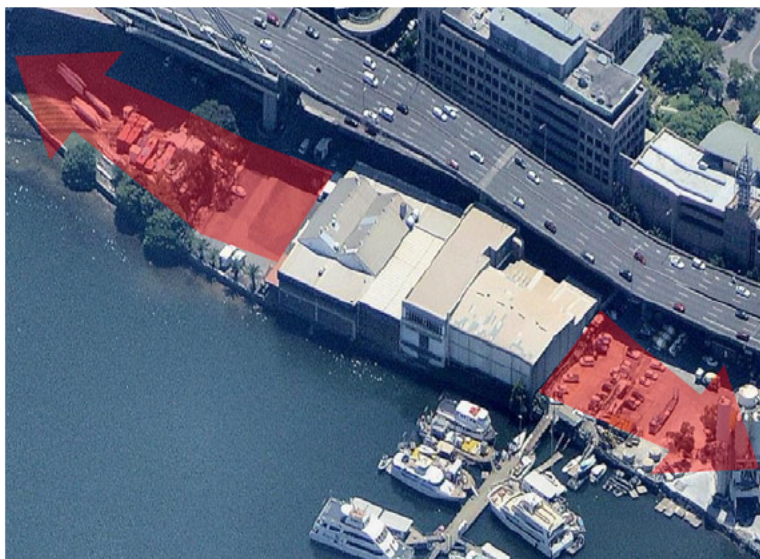


Figure 2 The Poulos Bros site harbour interface

Source: Nearmap, Ethos Urban

Further, Poulos Bros understand that INSW are investigating a floating pontoon as an alternative to a foreshore walkway link. This is clearly an indication of Government's tacit recognition of the questionable viability of the Poulos Bros site.

3.2.2 Framework for Key Sites

The Framework for Key Sites identifies the Star, Harbourside Shopping Centre, UTS Ultimo/Haymarket and Blackwattle Bay as Key Sites. These sites have been selected by DPIE under the assumption they will experience the greatest growth and change over the next 20 years.

The identified Blackwattle Bay Key Site includes the Poulos Bros site. DPIE note the principles of transparency, equity and probity have formed the basis for developing the Framework for Key Sites.

The draft framework outlines the following opportunities for additional public benefits for Blackwattle Bay Key Site:

- deliver 'low-line' beneath the Anzac Bridge pylons and the Western Distributor overpass
- a ribbon of activated, public open and recreational space, including formalised recreational boat facilities for Dragon Boats delivery of cultural and/or entertainment floorspace for recreation, meetings, events and new attractions.

The Poulos Site can deliver public benefit to the precinct through the potential of incorporating the Dragon Boat facility into any development, therefore freeing up much valued public open space. This has been discussed with INSW.

The following special considerations are identified for Blackwattle Bay, including:

- Sun access plane not breached, diversity of building heights with upper ranges limited to RL120-RL 156
- Prioritisation of the delivery of employment floorspace.

Importantly, the site is not affected by any heritage or character overlays and, as such, is relatively unencumbered to deliver greater GFA.

3.2.3 Tower clusters

The Urban Design technical report undertaken by Hassell (July 2020) has informed DPIE’s position on opportunities for tower clusters the draft Pymont Peninsula Place Strategy (2020). **Figure 3** illustrates that the Poulos Bros site has been identified as a site capable of change and this aligns with the vision for Blackwattle Bay as a media hub, tourist destination and new mixed use quarter as outlined in the Structure Plan.

Given the draft Strategy (2020) intends to deliver high rates of growth across Pymont Peninsula by 2041, there is clear opportunity for the Poulos Bros site, as recognised as a site capable of change, to accommodate some of this demand given the high strategic value and foreshore amenity.

However, the capability to accommodate change has not translated to the opportunity areas for taller building clusters (**Figure 3**). The taller building cluster excludes the Poulos Bros site, including land immediately opposite, on the northern boundary of Bank Street. There is no technical evidence that supports this direction. The northern part of Bank Street upholds the same level of strategic value and is exposed to the same accessibility constraints as the Poulos Bros site. This land is also within the vicinity of the Anzac Bridge pylons and therefore should be treated equally in terms of respect for heritage.

It is evident that this is not the case and therefore Poulos Bros question why their site has been excluded from the tower cluster when DPIE have recognised the site is capable of change.

Poulos Bros note that the harbour foreshore walk has been included in the tower cluster opportunity map. Again, if a feasible outcome is not reached, Poulos Bros will continue to operate at the site and a harbour foreshore walk cannot be delivered. Further, the under-bridge activation sought in the plan, as well as the activation of the foreshore will not be delivered if adequate GFA is not allowed at the site.

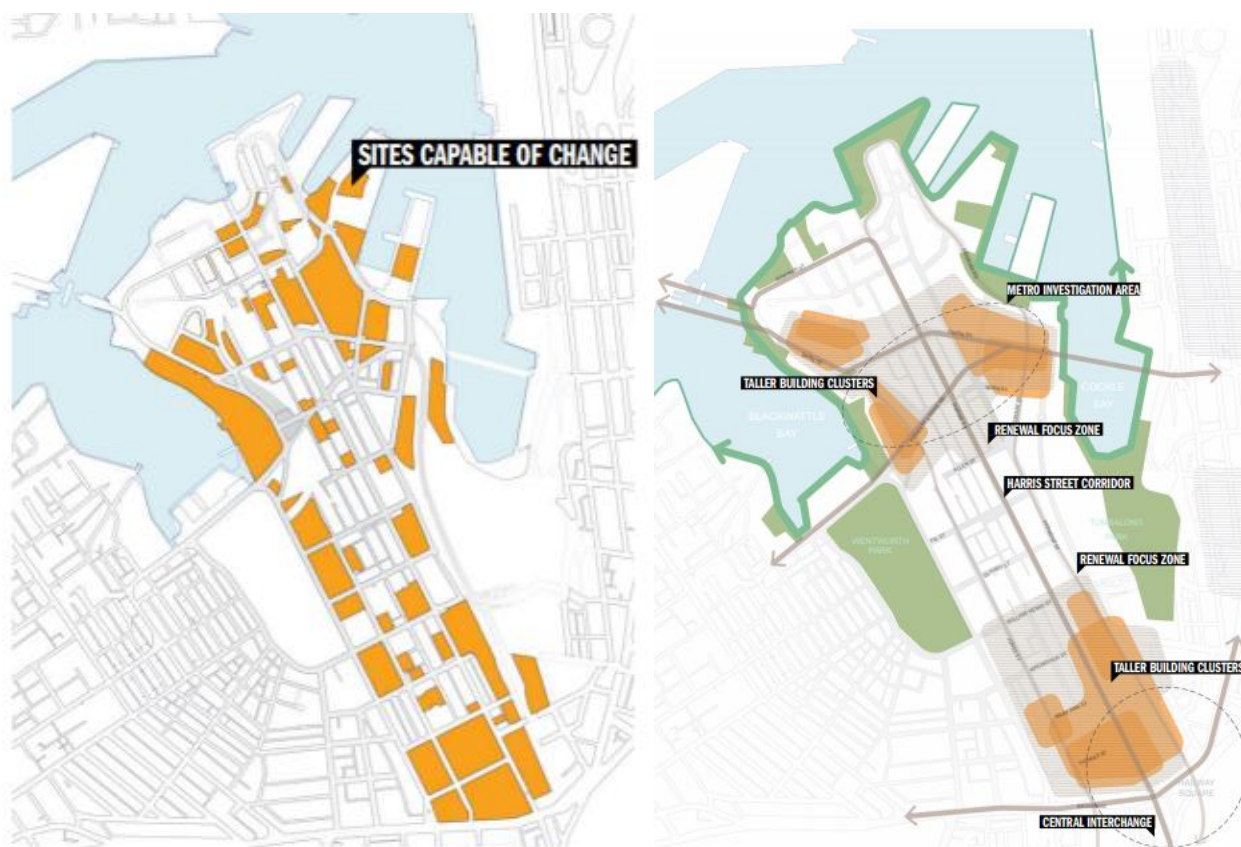


Figure 3 Sites capable of change & Taller Building clusters
 Source: Hassell, July 2020

4.0 Summary of key issues

The Blackwattle Bay SSP is currently on exhibition and there are a number of key issues associated with the Poulos Bros land identified as PLO 1-1 and PLO 1-2 in **Figure 4** below.

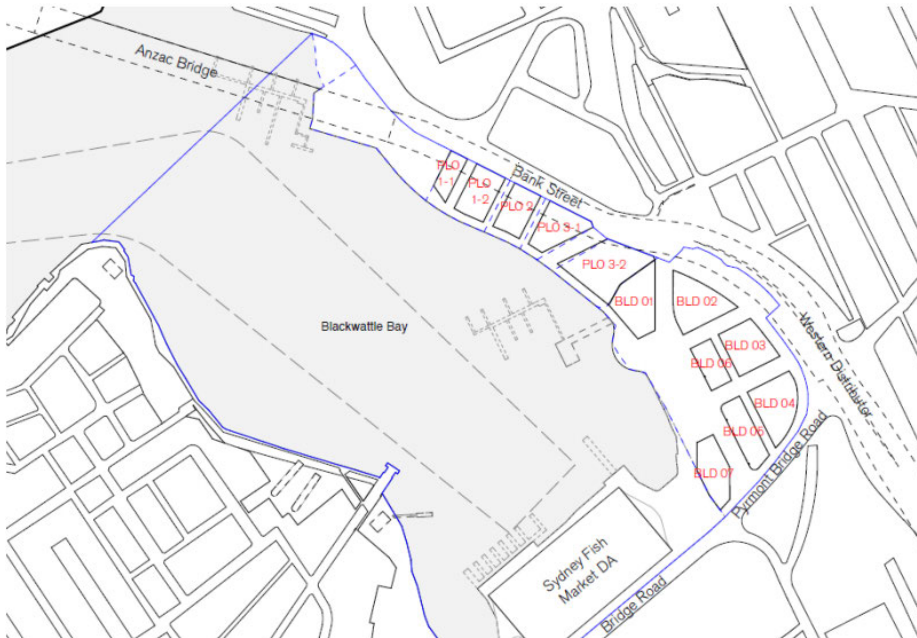


Figure 4 Proposed Development Blocks
Source: *Explanation of Intended Effect, DPIE, June 2021*

The key issues of concern regarding the proposed scheme for Blackwattle Bay SSP include:

- Structure planning;
- Building height;
- Floorspace;
- Land use mix;
- Prescriptive planning controls;
- Delivery of the Pyrmont Place Strategy Key Move #1.

4.1 Structure Planning

The SSP Study correctly identifies thematic precincts within the Study area. Simply, it can be broken down into the Government land, and the non-Government (private landowners) land. The Government land is identifiable as being larger, of wider dimensions and more centrally located. Contrastingly, the private landowner's land is smaller, thinner and locationally more remote. **Figure 5** below shows the character areas identified in the Study.

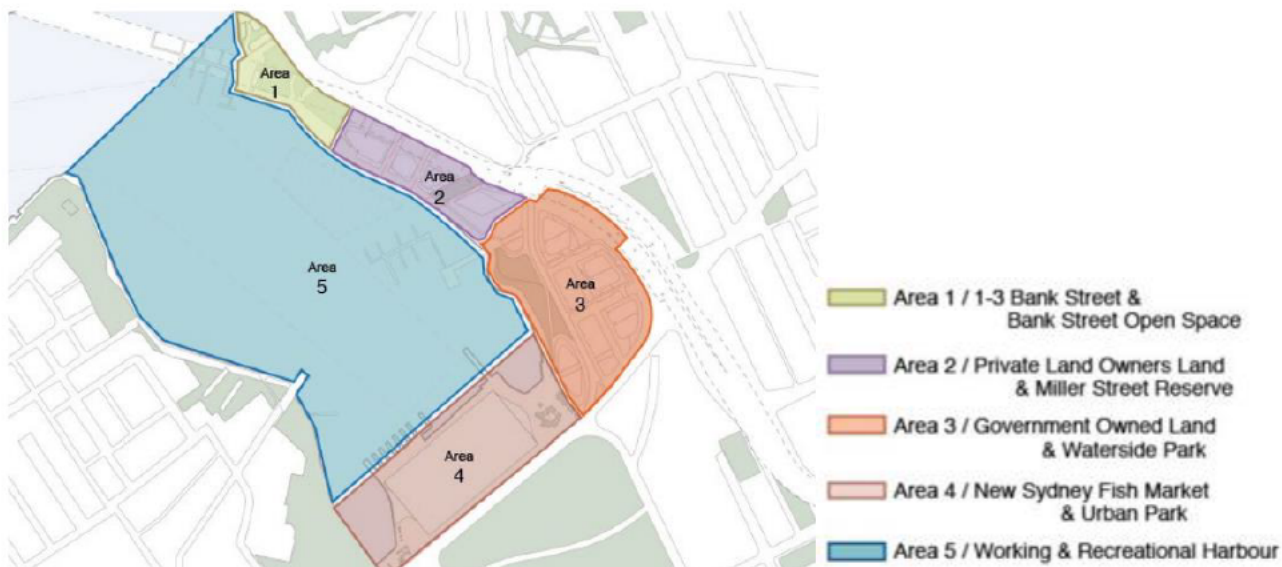


Figure 5 Precinct Plan Character Areas
 Source: Blackwattle Bay SPP Study, DPIE, June 2021

Despite the identification of areas of differing character, the plan then implements a 'one size fits all' approach to the master planning. Effectively, every site is to be zoned B4 Mixed Use as per **Figure 6** below, and then floor space allocated as per **Figure 7**.

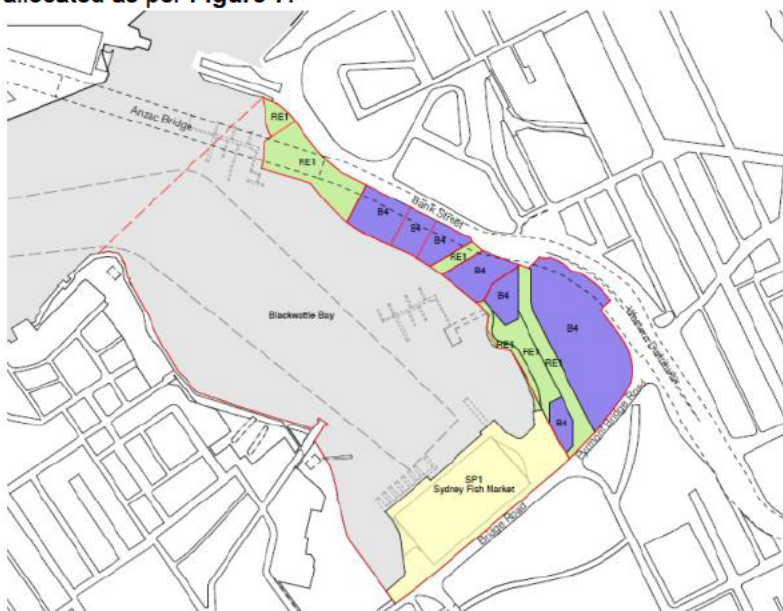


Figure 6 Precinct Plan Proposed Zoning
 Source: SSP Study, DPIE, June 2021

	New SFM	Poulos	Celestino	Hymix 1	Hymix 2	Exist SFM	TOTAL
Retail GFA (sqm)	11,105m ²	1,334m ²	804m ²	1,058m ²	334m ²	7,283m ²	21,918m ²
Office GFA (sqm)	15,646m ²	11,680m ²	6,235m ²	5,706m ²	10,357m ²	50,790m ²	100,414m ²
Hotel / Serviced Apts GFA		0m ²	0m ²	0m ²	0m ²	9,000m ²	9,000m ²
Residential GFA (sqm)		10,064m ²	8,910m ²	6,394m ²	8,505m ²	94,169m ²	128,042m ²
No. of Apartments*	0	124	110	79	105	1,163	1,581
Total GFA (sqm)	26,751m ²	23,078m ²	15,949m ²	13,158m ²	19,196m ²	161,242m ²	259,374m ²
Site Area (sqm)	38,450m ²	5,073m ²	2,971m ²	3,024m ²	4,667m ²	41,863m ²	96,048m ²
FSR	0.7	4.5	5.4	4.4	4.1	3.9	2.7
Residential as % of total	0%	44%	56%	49%	44%	58%	49%
Employment Uses % total	100%	56%	44%	51%	56%	42%	51%
No. of Jobs (FTE)**	725	701	377	354	598	3,152	5,907
No. of Residents***	0	224	199	143	190	2,099	2,854

Source: * Based on an assumed average dwelling size of 81sqm GFA

Source: ** Assumes 32sqm GLAR per worker in retail (assuming 60% of GLAR is food, groceries and food services) and 16sqm GLA per worker in the office space (sourced from City of Sydney Floor Space and Employment Survey 2017)

Also includes jobs in hotel at 0.75 per room and serviced apartments at 1 job per 3.5 rooms

Source: *** Assumes 2.09 residents per apartment (Forecast.ID) and 94% occupancy.

Figure 7 Land Use Mix

Source: Hill PDA, June 2021

As can be seen from Figure 7, the Poulos site provides more employment uses as a percentage of the total gross floor area than particularly the Government site.

We therefore question the basis for the urban structure for the following critical reasons.

- Commercial floor space should be centralised to establish 'precincts' or centres.
 - This can be accommodated on the larger footprint of the Government site, which is well suited to delivery of sought-after large floorplate offices, rather than 'strung out' between the Western Distributor and the water's edge along the private landholdings, which can only fit smaller floorplates.
 - Further, the western part of Pyrmont is residential in nature – with Jacksons Landing populating the western part of the peninsula proximate the private landholdings. Conversely, the Government land is proximate the future tourism and retail destination of the Sydney Fish Markets – one of Australia's most visited tourist destinations.
- Commercial land uses should be located proximate transport linkages. This is a long standing and undisputed integrated land use and transport planning principle. The Government land is nearer the planned Metro at Union Street and the existing Light Rail stops as well as the planned ferry and existing major road network. This is demonstrated in **Figure 8** below.

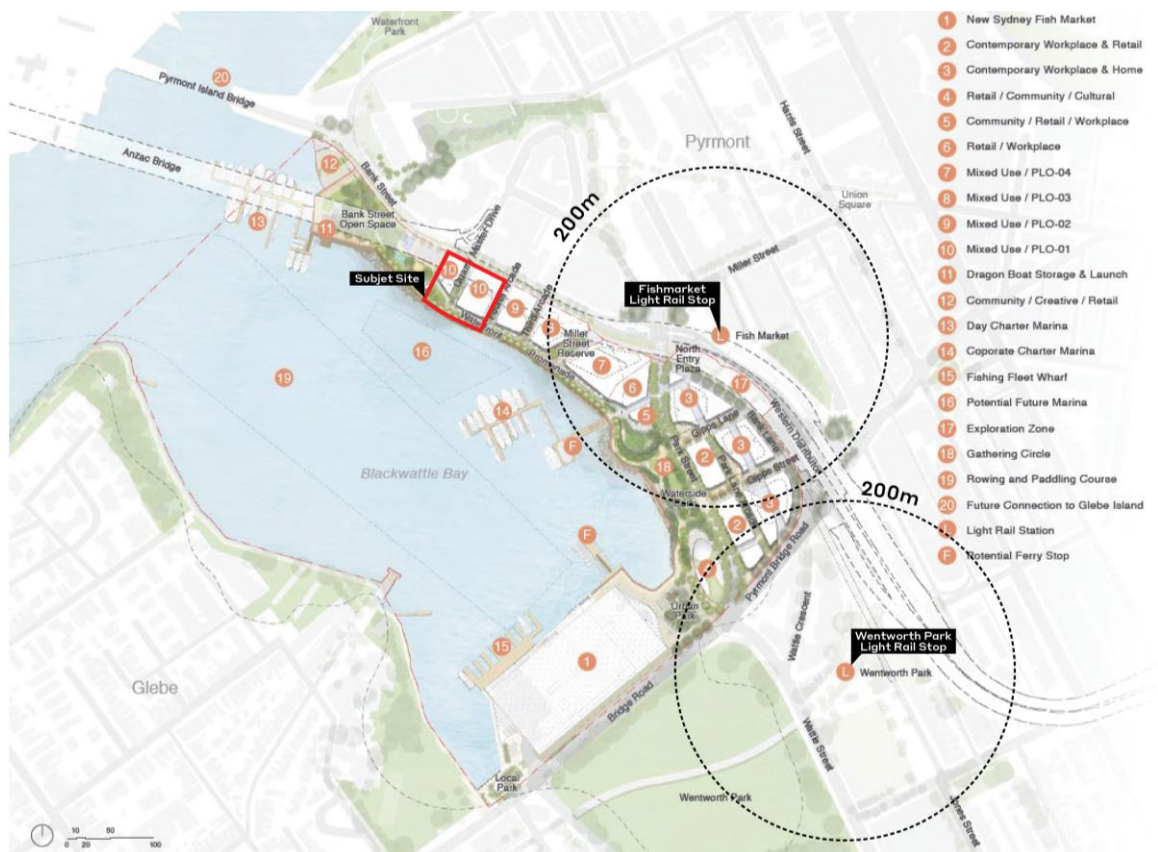


Figure 8 Light Rail proximity
 Source: Ethos Urban

- Finally, the larger Government site has a greater ability to accommodate large footprint buildings required for commercial land uses (refer Ethos Urban Property Economics Report as **Appendix B**), additionally Government is better placed to attract commercial tenants to its sites. Conversely, the private landowner sites are not as deep and therefore better suited to taller, slender towers as sought by the City of Sydney.
 - This is shown in the below **Figure 9**, which shows that the Government site is up to 140m deep, with the ability to therefore accommodate larger footprint buildings, as well as the associated break out and circulation spaces required of a commercial precinct. Conversely, the private landholdings are only 50m deep (approx.) which makes the provision of a viable commercial floorplate, plus outdoor areas and the new promenade difficult.

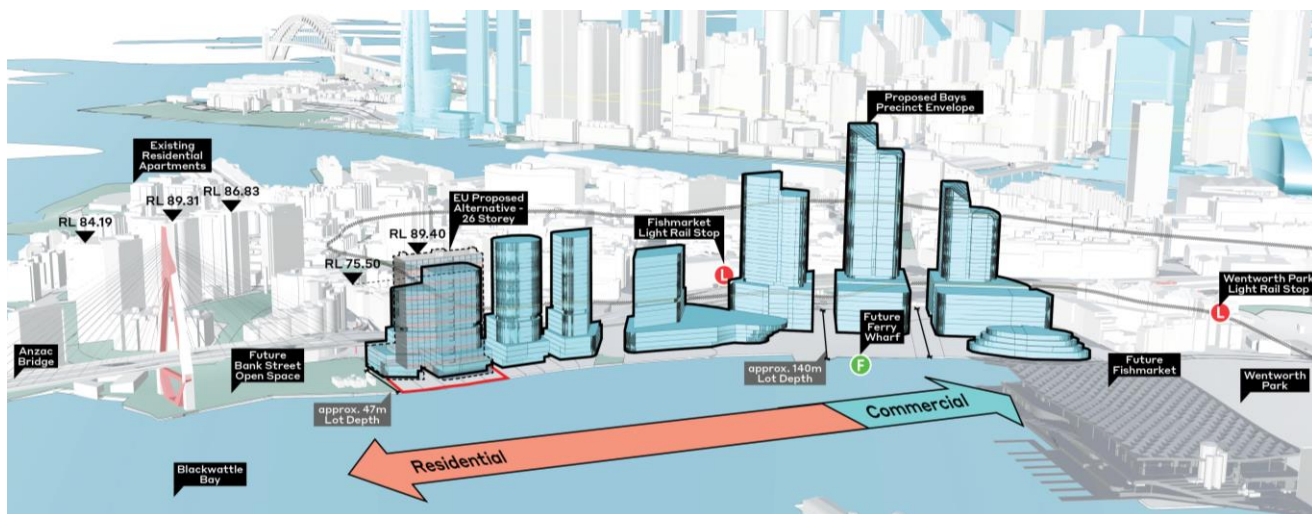


Figure 9 Suggested Master Plan approach to land use
 Source: Ethos Urban

4.2 Building heights

The building heights allocated to the sites are inequitable and inconsistent with the starting design principles established early in the process. There is little evidence to support the significantly lower heights on the private landholdings than that of the current fish markets site.

4.2.1 Building Height Principles

The original principle of no overshadow to the foreshore/parks seems to have been reinvented. **Figure 10** below is taken from the June 2020 INSW document “Revitalising Blackwattle Bay”, which again put forward the key principle guiding height being to ‘Minimise additional overshadowing to Wentworth Park and Glebe Foreshore between 9am and 3pm on the winter solstice’



Figure 10 Height Study: Revitalising Blackwattle Bay

Source: Infrastructure NSW

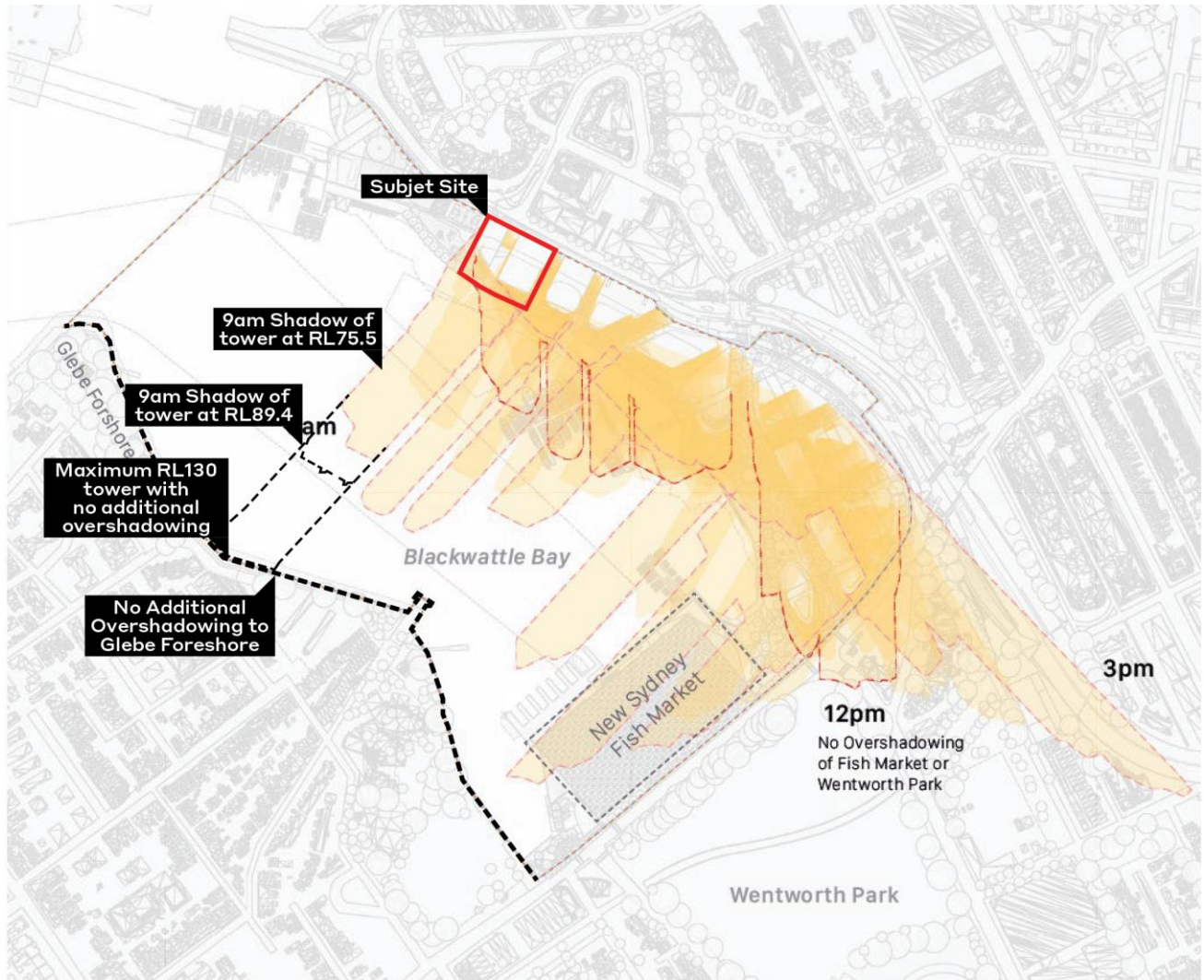
The height strategy developed by Hassell in the urban design analysis (July 2020) underpinning the Pyrmont Place Strategy considers the following attributes:

- Reinforcing the special historic character of the peninsula
- Protecting the amenity of key spaces and streets
- Recognising that many sites across the peninsula are unlikely to undergo renewal.

The site is not encumbered by any of these issues.

4.2.2 Shadow Impact

Based on this agreed principle, the site could accommodate a building up to RL130, as shown in **Figure 11** below.



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

Figure 11 Shadow Analysis

Source: Ethos Urban, FJMT

4.2.3 Height Profile

Further, there is little or no consideration of the emerging context for waterfront renewal in Sydney. For example, recent development approvals and proposals on the other side of the Pyrmont Peninsula, at Barangaroo, and on the Cockle Bay and Harbourside sites at Darling Harbour have much larger towers located very close to the waterfront. These towers are set on approximately six storey podiums, which are aiming to reduce the impact of the height of the towers on the amenity at ground level.

These principles could translate, with some adjustments, appropriately to the other side of the very same peninsula – to Blackwattle Bay. This is relevant as this whole area is classified by the Greater Sydney Commission as being part of the Eastern Harbour CBD, formerly known as Global Sydney, and the ability of this area to cater for the growth and change in Sydney’s most important centre is key to the economic, social and environmental success of the whole city.

Importantly, in terms of ‘height profile’, the private landowner’s sites can accommodate comfortably additional height without affecting the height profile of the precinct at a micro-level – even when considering the RLs of the Pyrmont Bridge pylons (a new concept introduced late in the design iterations of INSW) and adjoining development, but also at a macro scale when considering the broader Sydney skyline beyond the site as shown in **Figure 12**, which also shows the increasing height profile of Barangaroo as development nears the public open space areas. We note that INSW have chosen the opposite height profile to support the objective of greater height on the Government lands.

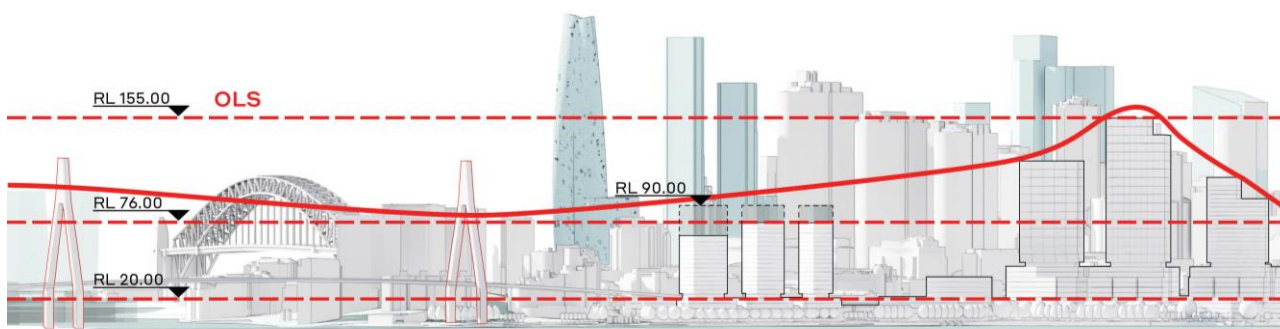


Figure 12 Height Profile
Source: Ethos Urban

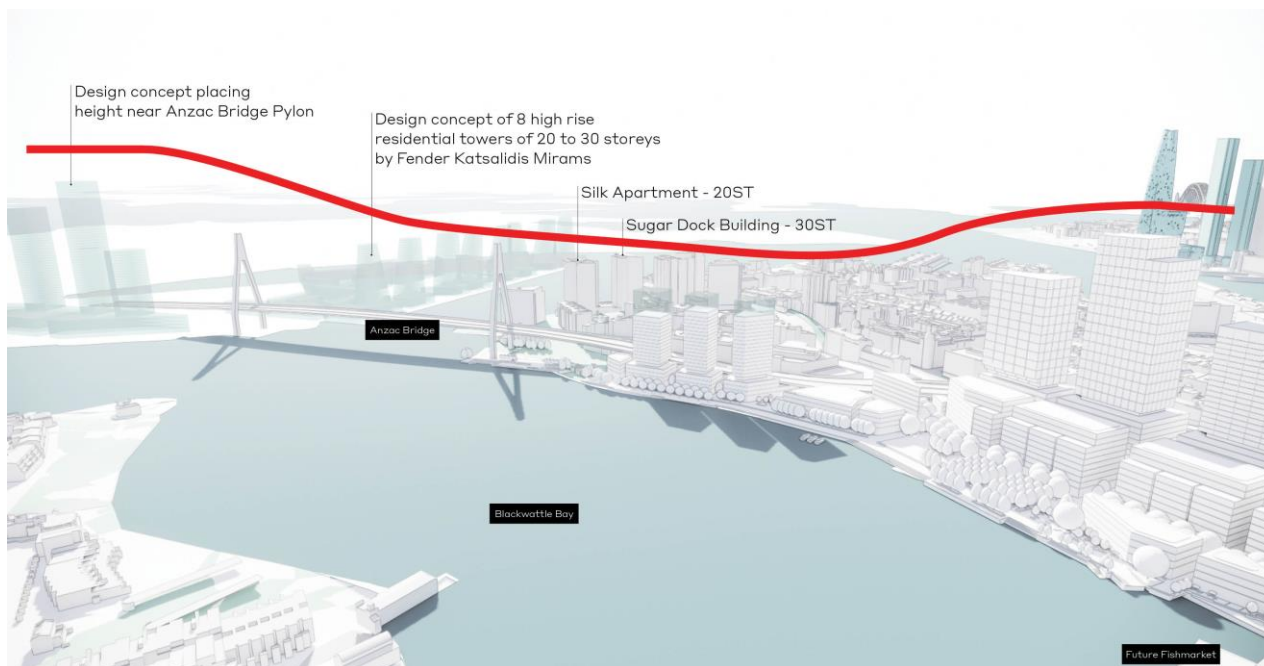


Figure 13 Height Profile considering further Bays renewal
Source: Ethos Urban

4.2.4 Local Context for Height

As discussed, there is no adequate justification for the reduction in height for the Poulos site. In terms of local context, the site can accommodate RL90 and comfortably sit amongst the tall building cluster of Jacksons Landing. It is worth noting that these buildings were approved some 30 years ago – and that an evolving international City such as Sydney would anticipate greater heights than those approved 30 years ago. This is shown clearly in **Figure 14** and **Figure 15** below.

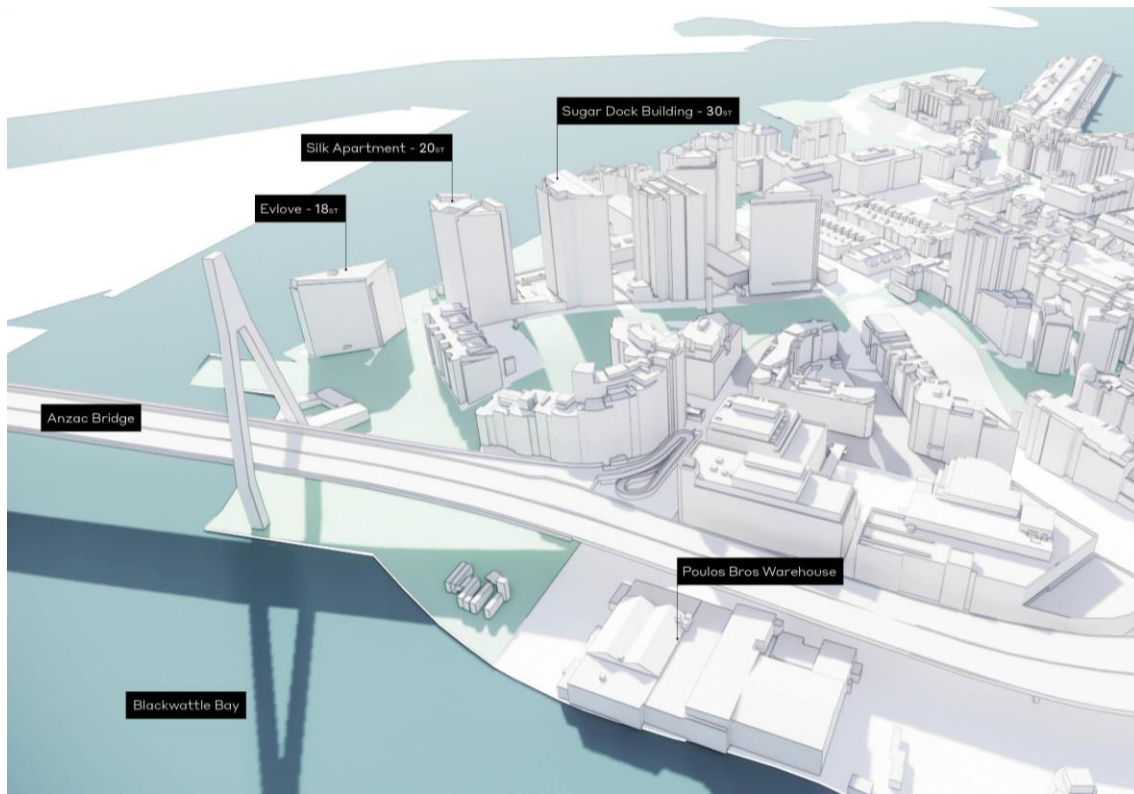


Figure 14 Jacksons Landing height reference
Source: Ethos Urban

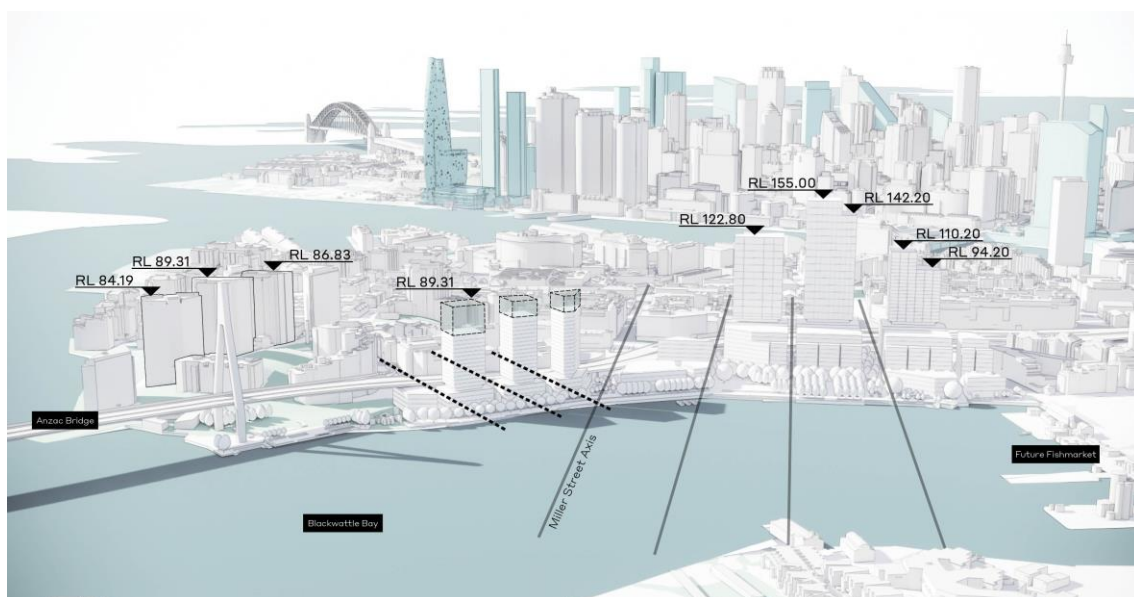


Figure 15 Jacksons Landing height reference
Source: Ethos Urban

Considering the height profile of the buildings beyond the site, being Barangaroo and the Crown Tower, as well as the buildings proposed for the former Fish Markets site, a building of minimum 30+ storeys for the site would:

- Achieve better context with the building heights on the Government land;
- Provide suitable development feasibility to enable renewal;
- Activate the foreshore and adjacent park and activate the (lesser) non-residential uses such as commercial and retail activities within and surrounding the site;
- Be in context with other tower sites across the peninsula, as well as other waterfront sites from Circular Quay, Barangaroo, Cockle Bay and Darling Harbour.
- Allow additional social and affordable housing that could be delivered in the scheme;
- Result in a far lesser car park generation than the three options presented by INSW in terms of land use mix.

Achieving this growth is consistent with recent urban renewal precincts within the vicinity of Blackwattle Bay, and mindful of the site's position as part of the Eastern Gateway

4.3 Floorspace

4.3.1 Prescriptive Controls

Having such stringent controls on development blocks completely disregards the opportunity for merit based on detailed assessment and analysis of all aspects of this complex site. Broadly however, the proposed yields are retrograde, and less than the comparable sites in Jacksons Landing – which were master planned in the 1990s.

Further, our client objects to the 'micro' level of planning proposed for each site that has been put forward for the private landowners by INSW, including Block controls prepared for development lots in a new draft Design Code for Blackwattle Bay (refer Attachment 14 of SSP Study). The block controls specify maximum heights, podium heights, setbacks and gross floor area (GFA) for each development lot.

Having such stringent controls on blocks, as well as total maximum GFAs for each land use completely disregards the opportunity for a merit assessment based on new or more detailed information. For example, Poulos Bros have engaged independent reviews of both the Acoustic Assessment and Air Quality Assessment which have shown that residential uses can be supported below Level 8 in the podium subject to certain mitigation measures. This is discussed more in **Section 0**, however the proponent seeks the deletion of prescriptive GFA controls by land use.

4.3.2 Equitable FSR as a Principle

The landowner raises the inequality of the FSR approach put forward by INSW in their detailed master planning. It appears that there has been an introduced guiding principle for equity of floor space ratio (FSR) applied across all sites. There is also concern at the ratio of residential to non-residential FSRs for each site. This is discussed in **Section 0** below.

This is far from a sound approach to an integrated or holistic master planning process for a renewal precinct such as the Bays Market District for a number of reasons:

- It does not follow a sound planning and design-based approach. FSR controls should be a result of a first principles, design led process that firstly allocates heights, building forms and land uses that respond, on merit, to each site's unique attributes. The FSR is then an output of well-considered master planning.
- Given the size of the former Fish Markets site, an equitable FSR results in a disproportionate amount of gross floor area allocated to that site. Conversely, it results in unviable – and incongruous – building forms on the remaining, smaller sites held in private ownership.

4.4 Land use mix

The land use mix proposes a high proportion of non-residential FSR however floorspace demand modelling has not considered planned growth or future demand in competitive fringe locations, particularly the broader Pyrmont Peninsula, the Sydney CBD, the Central SSP, Central to Eveleigh and nor has it quantified the COVID-19 demand implications.

The SSP Study Requirements did not request the feasibility of future development, only testing ability to contribute towards local, state and regional infrastructure. This is a short sighted approach, as project viability is a key driver to a long term landholder such as Poulos Bros, but also for the delivery of the requisite public benefits anticipated from this renewal.

TASK		Section in Report
18. Feasibility and Economic Benefits		
18.1.	Provide an analysis of the market demand for the proposal	Sec. 5
18.2.	Demonstrate that the development can be delivered in the context of prevailing market demand and supply trends, achievable uptake rates relating to development staging and product mix.	Sec. 5
18.3.	Provide an economic assessment of the proposal, including the likely wider economic benefits.	Sec. 8
18.4.	Provide an assessment of the likely economic impacts of the rezoning of industrial and maritime related land.	Sec. 8
18.5.	Undertake an economic analysis testing feasibility of future development to contribute towards local, State and regional infrastructure.	Sec. 8.6
18.6.	Investigate the potential for visitor accommodation within the precinct and consider an appropriate target, taking into account access and connectivity to existing and planned nearby visitor accommodation including in the wider Bays Precinct.	Sec. 5.4 and 8.4

Figure 16 SSP Study Requirements

In short, the Poulos Site is identified to accommodate 11,680sqm of commercial floorspace, which accounts for 12% of the total 1000,000sqm proposed commercial floorspace for Blackwattle Bay SSP. This is significantly greater than the other private landowners, Celestino (6,235sqm or 6% of total), Hymix 1 (5,706sqm or 6% of total) and Hymix 2 (10,357sqm or 10% of total) as well as the Government site.

The Executive Summary of the Hill PDA Economic Development Study highlights that Blackwattle Bay has the capacity to accommodate the NSW Government’s proposed 100,000sqm of commercial floorspace, yet the body of the report does not demonstrate that there is demand, nor has market feasibility testing been undertaken. The Ethos Urban Economics Assessment attached as **Appendix B** notes the considerable headwinds facing commercial development at this location.

For example, The Pyrmont Place Strategy alone intends to increase the supply of commercial buildings across Pyrmont, identifying that an additional 600,000–800,000 sqm of floorspace will be required across the Peninsula by 2041 with the City’s CSPA adding a further 2,900,000sqm of floor space. With the unknowns of the long term impact of COVID-19, we request that the Department consider a reduction in the non-residential GFA proposed.

Hill PDA note the Sydney Fringe market achieved a net absorption rate of almost 8,900sqm per annum over the past ten years and 17,800sqm over the past five years. Assuming a rate of 13,500sqm per annum, the amount of office space planned for Blackwattle Bay meets 40% of the Sydney fringe. At this rate, it would take 17 years to absorb that space. However, Hill PDA report 20-25 years is a more likely timeframe. Therefore, redevelopment is unlikely in the short to medium term and the renewal of the precinct unrealistic and items such as the foreshore boardwalk undeliverable. We question the justification of a plan with a 25 year delivery timeframe.

Despite reporting in the Executive Summary that Blackwattle Bay can accommodate 100,000sqm of commercial floorspace, the report notes there are opportunities to retain some of the working harbour uses that occur in Blackwattle Bay and integrate these with office-based uses. This suggests acknowledgement demand is not as high

as reported and non-commercial floorspace uses would be appropriate. In summary, the Economic Development Study does not present a strong case for 100,000sqm of commercial floorspace demand. The SSP study shows no consideration of equity. None of the technical studies demonstrate why the Poulos Bros site contains the greatest proportion of overall commercial floorspace.

Further, feasibility testing shows that non-residential floorspace on the site is unviable and will therefore inhibit the funding of infrastructure and rejuvenation of the waterfront promenade. This is referred to in Section 4.6, which discusses the delivery of the Place Strategy Key Move 1: Delivery of a World Class Harbour Foreshore Walk.

Finally, in terms of car parking and traffic and considering the location of the site that is furthest from the main road network and public transport nodes, residential uses would result in far less car parking demand and traffic generation than commercial uses. We believe the decision to install this quantum of commercial floorspace is questionable and will require greater levels of car parking to make up for this poor public transport accessibility. This will result in poor urban outcomes, namely:

- Higher traffic generation and impact on the pedestrian and cycle environment, as well as Green Links sought in the draft Place Strategy design principles.
- Exacerbation of the current traffic issues facing the area – resulting in a further perverse impact on the viability of the commercial floorspace.

Basement car parking will be highly costly considering the location of the site, and likely be required to be delivered above ground (sleaved) which is troublesome when needing to deliver large amounts of car parking and results in a poor urban outcome.

We refer you to **Appendix B** attached that provides an independent assessment of the Economic Market and Impacts anticipated. It does not support the proposed development as currently before the Department.

4.5 Over-Prescriptive controls

The proponent has serious concern with the nature of the prescriptive controls put forward by INSW over the private landowner sites, without their input or ability to feed into. These controls are at a level of Concept DA and not suitable for higher level rezoning purposes.

Specifically, the basis for these controls is questioned.

In response, Ethos Urban have prepared alternative design options that were tested by industry leading experts for suitability.

4.5.1 Alternative options considered

Ethos Urban designers have prepared an alternative scenario in consultation with the technical experts in air quality and acoustic impact. These are provided as **Appendix A** however reproduced in the below

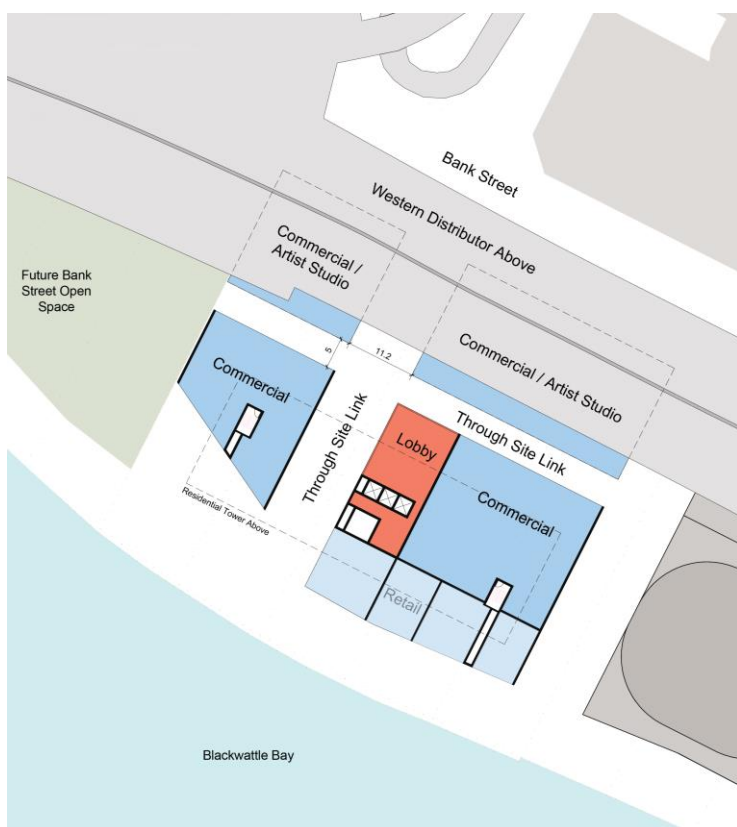


Figure 17 Proposed Alternative – Ground Floor Plan
Source: Ethos Urban

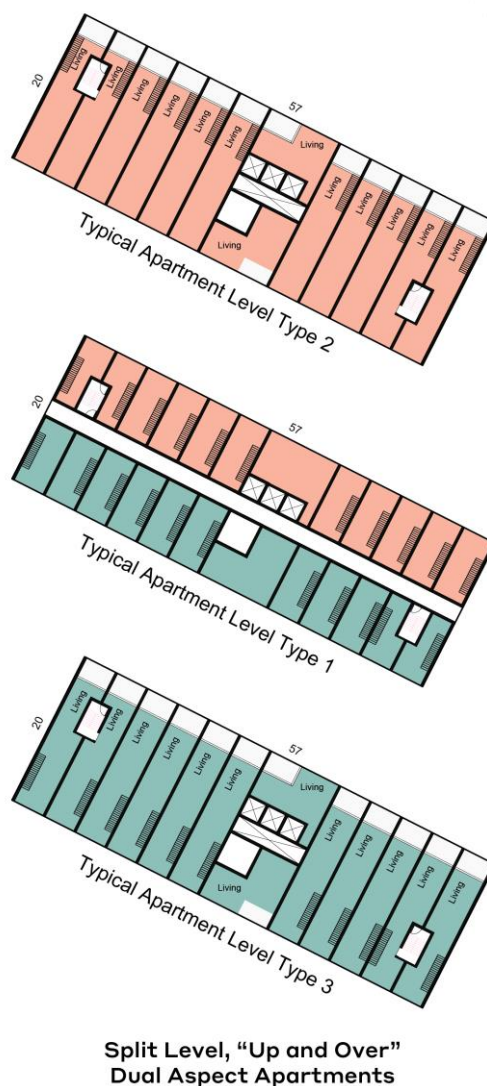
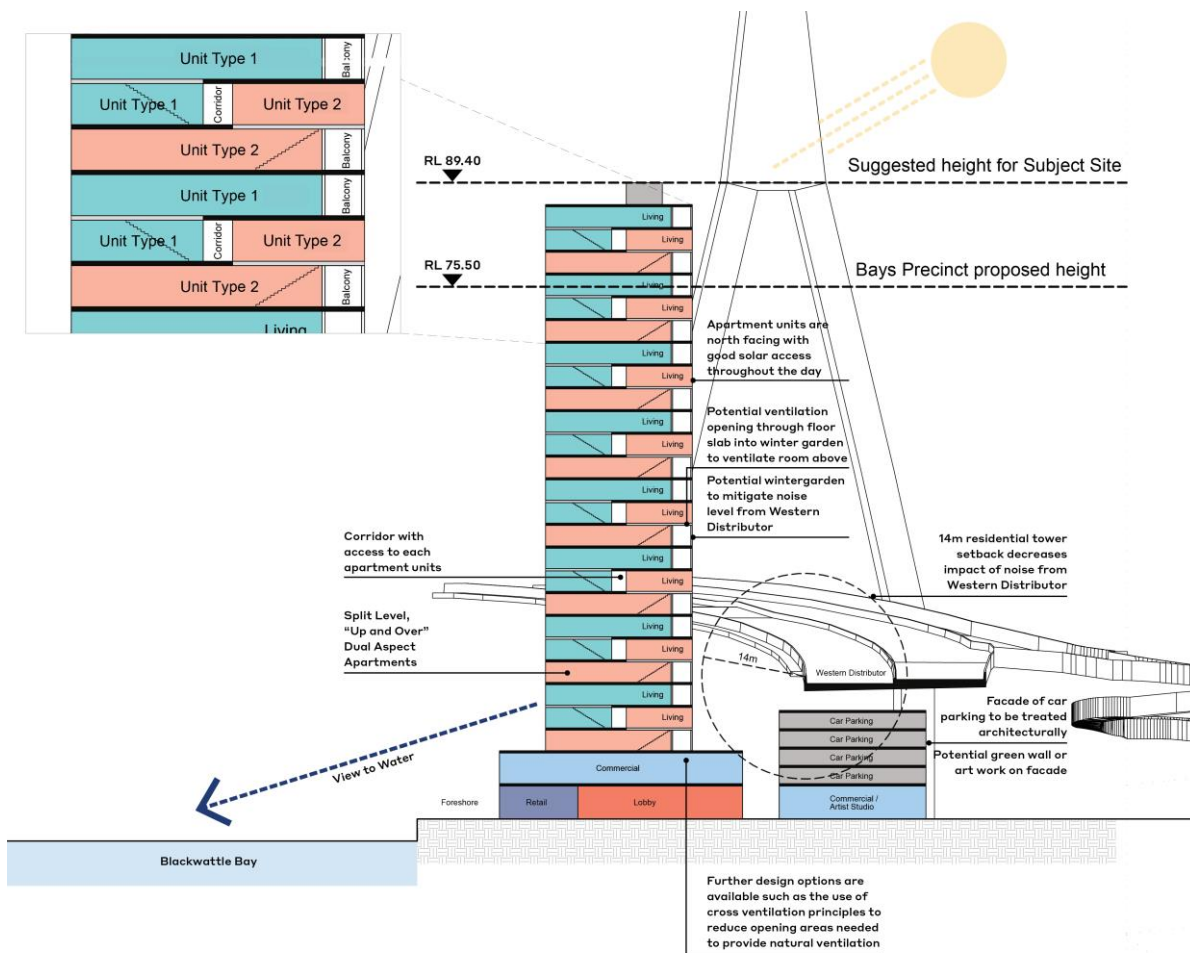


Figure 18 Proposed Alternative – Apartment layout



Indicative Section of Split Level, "Up and Over" Dual Aspect Apartments

Figure 19 Proposed Alternative – Section
Source: Ethos Urban

4.5.2 Acoustic Impacts

The Proponent has engaged Renzo Tonin and Associates to peer review the work undertaken by INSW in relation to acoustic impact and provide advice on possible alternatives. The report is attached as **Appendix C**.

The report found that there are in fact alternative means of achieving the requisite standards at the Poulos Site and that the measures put forward in the INSW scheme are but one way of achieving suitable amenity. The alternative means include:

- Set Backs, Apartment Layout and Building Orientation.
- Winter Gardens and Sliding Door Design.
- Balcony Design.
- Passive Acoustic Ventilators.
- Use of Cross Ventilation to Reduce Window Opening Sizes.
- A combination of treatments.

Further, Renzo Tonin provided advice on the Ethos Urban design alternatives considered above and were able to support these from an acoustic impact perspective. Specifically, Renzo Tonin can support residential uses below Level 8 – which we were advised by INSW as not achievable.

4.5.3 Air Quality

The Proponent has engaged RWDI to peer review the work undertaken by INSW and provide advice in relation to air quality and advise on possible alternatives. The report is attached as **Appendix D**.

The report found:

- There are no impediments to delivering residential uses below L8 – as long as openings are oriented away from the Western Distributor – under current modelling forecasts, however:
 - There are discrepancies in the weather simulation that impacts on the results for the Poulos site
 - There is a lack of consideration of motor vehicle emissions – which are decreasing considerably. The modelling considers outdated data.
- There are alternative design approaches that will result in achievable air quality measures.

Further, RWDI provided advice on the Ethos Urban design alternatives considered above and were able to support these from a noise quality perspective. Specifically, RWDI can support residential uses below Level 8 – which we were advised by INSW as not achievable.

4.6 Delivery on the Pyrmont Place Strategy Big Moves

Big Move 1 of the Draft Pyrmont Peninsula Place Strategy (July 2020) is to “*secure the final links of the Sydney Harbour foreshore link at Blackwattle Bay and Darling Island*”. A World Class Harbour Foreshore Walk.

Poulos Bros supported this key action of the draft Plan; acknowledging that it is part of Government’s broader initiatives for coastal access and connections, as well as well consider public spaces. However, achieving a continuous waterfront promenade will require access to the privately held sites; otherwise the vision simply cannot be achieved.

As such, the proposed planning controls for the sites must be viable in the short term to enable activation.

The Place Strategy recognises that “*this represents a significant placemaking outcome that can only be secured through collaborative partnership between NSW Government, the City of Sydney, landowners, businesses and community*”. To date, the collaborative partnership has not been evident. There has been many meetings and workshops, however there is little evidence to suggest that the current INSW proposal is a viable outcome for the private landowners, despite a consistent message being put forward by the landowners – that this is not a viable proposition. The landholders have not seen any viability testing undertaken by INSW.

In response, we understand that INSW have put forward a floating pontoon as an alternative to a foreshore walkway link. This is clearly an indication of Government’s tacit recognition of the questionable viability of the private landholdings and a sub-optimal outcome when considering the existing operations it wishes to circumvent.

This is a far cry from the regionally significant placemaking opportunity sought in the Plan and is clearly counter to the intent for this to be “*a new global destination for Greater Sydney*”.

5.0 Amendments Sought

As discussed, the position of Poulos Bros has varied little since the initial engagement with INSW.

This submission, and those previous, seeks the following amendment to the SSP:

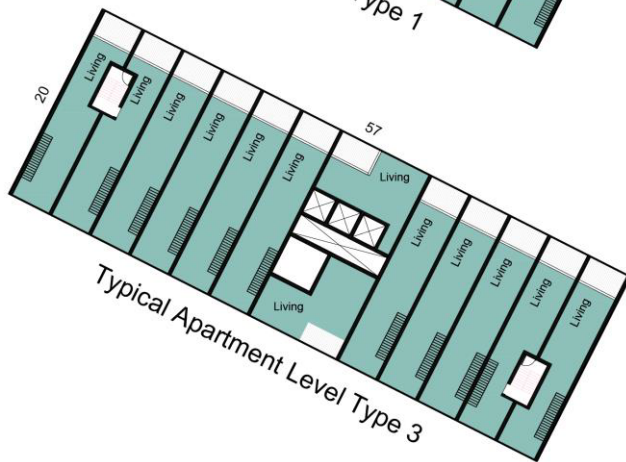
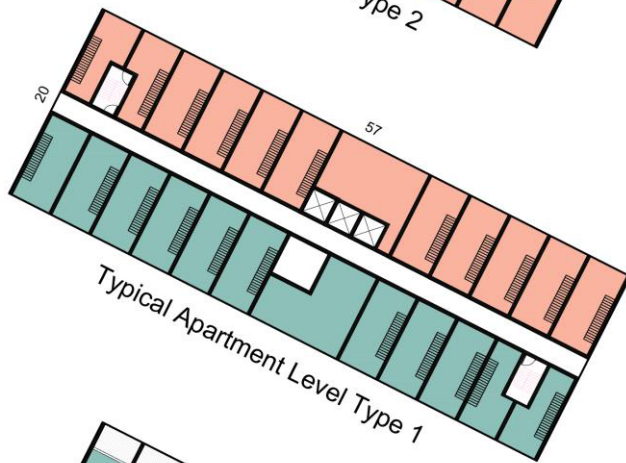
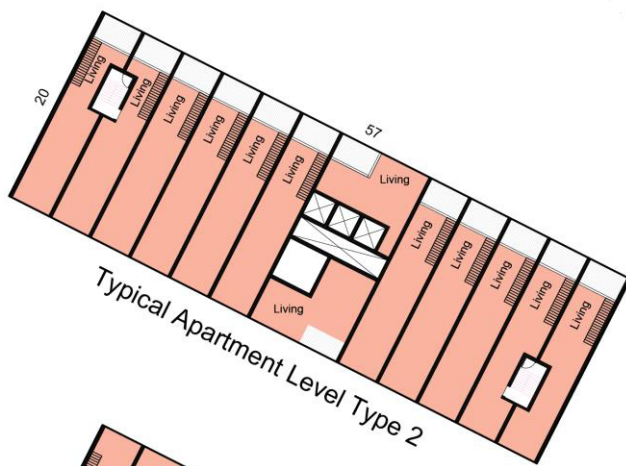
- Reduce the quantum of non-commercial floor space to refocus the Government site for the main delivery of commercial space.
 - It is considered that a minimum requirement of 2-3 storey of non-residential uses to provide for possible street level activation such as food and beverage as well as two levels of local employment, business or maritime related uses is suitable. If it proves feasible to provide more, then the minimum non-residential floor space requirement allows more to be delivered.
- Delete specific maximum GFA requirements.
- Reconsider building height to allow buildings up RL90 (30 storeys) akin to the Jacksons Landing RLs and more balanced with the Government lands.
- Delete specific built form provisions as they relate to the shape and form of the buildings.

We thank the NSW Department of Planning, Industry and Environment for the opportunity to engage on the draft SSP for the Blackwattle Bay precinct. Considering that Poulos Bros have been involved in the planning process since its inception, we would welcome the opportunity to meet and discuss the concerns raised in this submission in a face to face meeting.

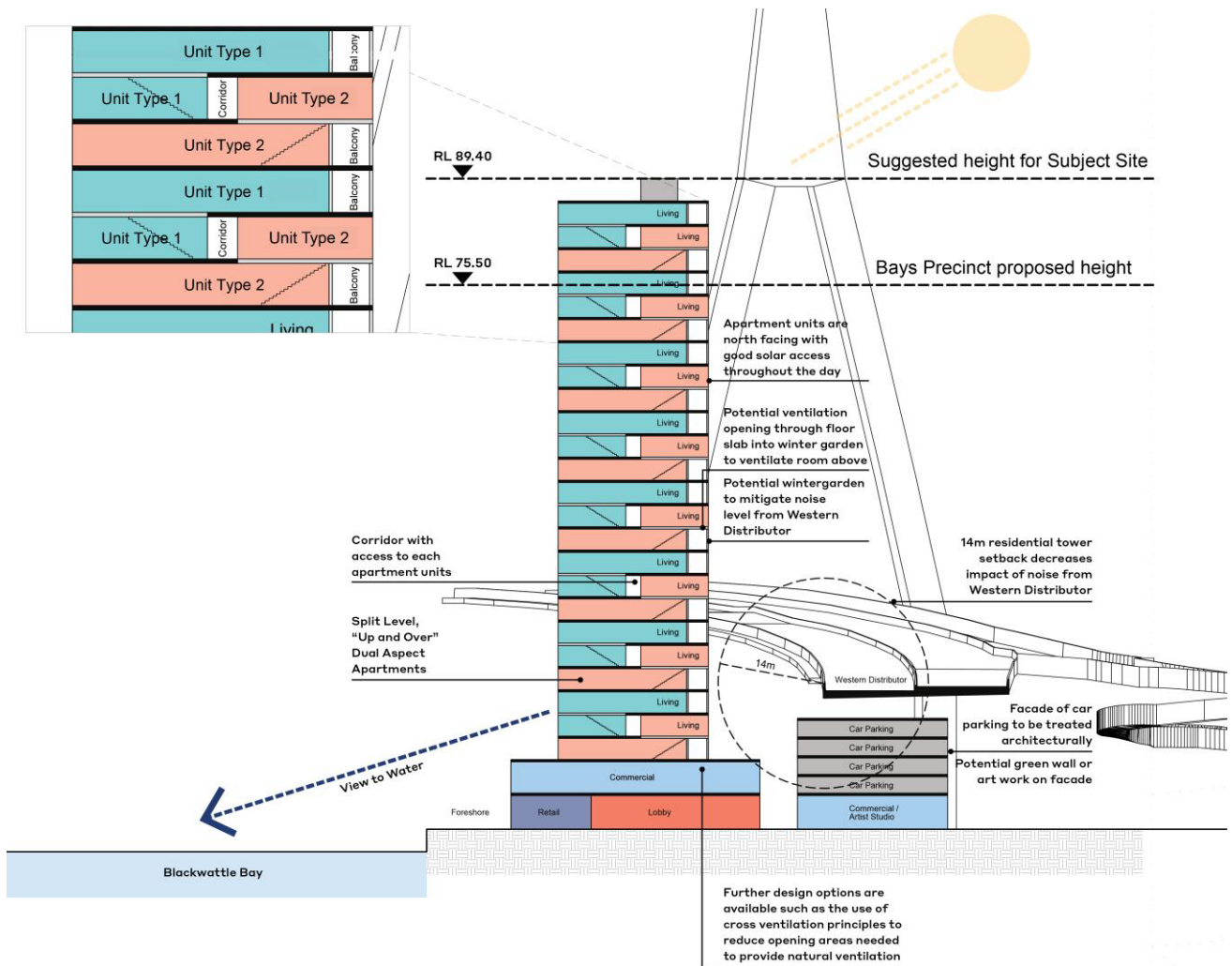
Please contact Tom Goode at tgoode@ethosurban.com or on 0406428465 to arrange a suitable time to meet.

Appendix A. Architectural Concepts



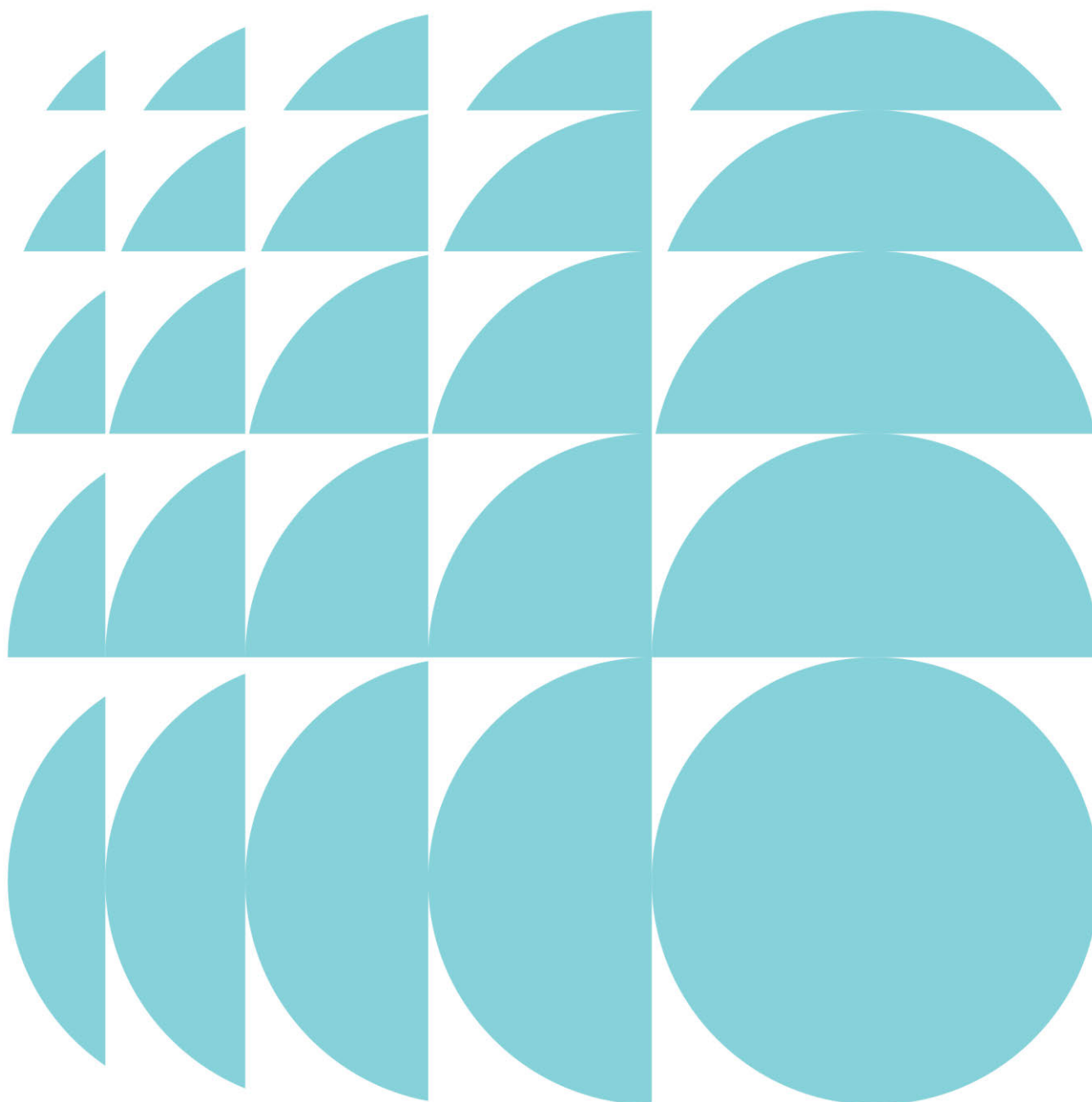


**Split Level, "Up and Over"
Dual Aspect Apartments**



Indicative Section of Split Level, "Up and Over" Dual Aspect Apartments

Appendix B. Economic Assessment



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1.0 Introduction

This report has been prepared on behalf of Poulos Brothers (Poulos Bro's), a private landowner in the Bays Market Precinct, and forms part of the broader planning submission for 21-29 Bank Street, Pyrmont (the Site) in response to the public exhibition of the Blackwattle Bay State Significant Precinct (SSP) Study.

The Site is situated within the Bays Market Precinct, a strategic area identified for renewal under the broader Bays Precinct renewal and Pyrmont Place Strategy. The Bays Market Precinct is positioned within a relatively enclosed part of Pyrmont, west of Bank Street. The newly announced Pyrmont Metro Station is located some 800m east of the Precinct.

The Bays Precinct renewal strategy is ultimately planned to deliver a mix of residential, community and business uses, incorporating around 1,550 dwellings and 138,000m² of non-residential floorspace. This non-residential floorspace is planned to comprise commercial, retail and community uses, and is estimated to support around 5,600 new jobs within the precinct.

In relation to private landholdings within the precinct (including the Site), the SSP Study requires a land use mix for any future development to allocate no more than 44% of floorspace to residential uses and at least 56% of floorspace to non-residential uses. The non-residential uses have been outlined to primarily comprise commercial office, along with smaller retail uses. Adopting the recommended mix at the Site would result in the following composition:

- Total Gross Floor Area (GFA) of just over 23,000m²
- Of the total GFA, a minimum non-residential GFA of 13,000m² is required. The majority for commercial office use, along with a small provision of retail floorspace.
- The remaining 10,000m² can be allocated to residential uses.

Private landowners within the Bays Market Precinct, including the Poulos Bros are concerned over the commercial viability associated with the proposed allocation of uses proposed in the SSP, particularly in relation to the minimum provision of non-residential floorspace required. Under the proposed requirements the Poulos Bros site is required to deliver the equal highest amount of non-residential floorspace out of all sites within the precinct. This is despite the fact that even larger, more central landholdings, such as the Government controlled site at the Fish Markets allows for 58% residential in comparison.

This report provides a high-level review and commentary on the likely viability for non-residential uses (and specifically commercial uses) at 21-29 Bank Street, Pyrmont having regard to the market context and economic conditions.

This report sets out the following:

- Office market overview, including a review of the existing size and performance of relevant commercial office markets.
- Market outlook, providing commentary on contemporary office tenant requirements, locational success factors and implications of COVID-19.
- Summary, highlighting key findings and the implications for the 21-29 Bank Street, Pyrmont site.

2.0 Office Market Overview

2.1 Office Market Summary

Metropolitan office markets are continually changing, characterised by increasing demand requirements for high-quality stock, supply challenges, and changing workspace requirements. This is particularly evident within the context of Greater Sydney, which has seen further changes in the past year in response to COVID-19 and the implications for commercial office uses.

A summary of office market performance and key market indicators across the Sydney CBD are highlighted below:

- Existing stock:** An overview of existing levels of office stock by market is shown below in **Table 1**.

Over 5,100,000m² of office stock is provided within the Sydney CBD as at July 2021. This represents an increase from 4,977,938m² in July 2020, following an increase in supply.

Increasing office supply in the past 12 months has been a consistent trend across most Sydney markets, with close to +100,000m² of additional supply added in North Sydney, and around +70,000m² in Parramatta. These established office markets will continue to evolve in the coming years.

With an estimated 270,000m² of commercial office floorspace Pyrmont represents a small office market as compared to other commercial centres across Sydney, including Sydney CBD, North Sydney, Parramatta and Macquarie Park - with each of these markets being between 4-20 times larger than Pyrmont.

It is worth noting that the majority of Pyrmont office floorspace is supported at the northern peninsula of Pyrmont, close to the Sydney CBD at Darling Island, Jones Bay Wharf, and John Street. These precincts are located some distance from the planned Bays Market District.
- Vacancy:** As at July 2021, the vacancy rate within Sydney CBD was 9.2%, this represents a solid increase from the previous year of 5.6%, reflecting impacts of COVID-19 on occupancy rates. Other major commercial markets in Sydney are also recording vacancy rates of between 9%-17%. This high level of vacancy, representing an increase in office vacancy over the past year, has been a consistent trend across all office markets, driven by work from home (WFH) requirements following the public health response to COVID-19. Rising vacancy has also been attributed to new supply additions that have been completed in the past year in centres including North Sydney, Sydney CBD and Parramatta which are yet to be absorbed by the weaker demand conditions
- Net absorption:** Demand for commercial office floorspace has been subdued, reflecting challenging economic conditions associated with the COVID-19 pandemic. Net absorption across the Sydney CBD office market was recorded at -24,402m² over the year to July 2021. Negative net absorption was also recorded in Macquarie Park and Chatswood, while markets like North Sydney and Parramatta experienced mildly positive net absorption figures, reflecting the completion of new developments that were leased pre-COVID.

A review of net absorption figures shows that demand is strongest in prime grade stock (stock classified as Premium or A grade). This demand for prime grade stock is driven by evolving modern office tenant requirements for high quality office spaces that provide large and efficient floorplate designs, and premium office amenities and services to enhance user experiences.
- Rents:** CBD rents have increased significantly over the past decade, particularly within the core commercial markets. As of January 2021, Sydney CBD rents for prime spaces were at \$1,385/m², with average rents for secondary stock at \$1,017/m². While face rents have remained relatively stable during COVID-19, incentives being offered to tenants have increased substantially, resulting in a decline in net effective rent in the order of -15 to -20% (*Knight Frank March 2021*).

Property Council Australia – Office Market Report July 2021

Table 1 Office Stock and Vacancy Rate – Key Markets July 2021

Office Market	Office Stock (m ²)	Total Vacancy (%)
Sydney CBD	5,149,548	9.2%
North Sydney	922,793	16.4%
Macquarie Park	904,710	9.7%
Parramatta	836,026	10.2%
St Leonards/Crow's Nest	338,435	15.1%
Chatswood	273,454	15.2%
Pymont	270,000	N/A

Source: Ethos Urban, Knight Frank, PCA OMR July 2021

2.2 Future Competition

Government strategy indicates that Pymont will continue to grow and remain a key employment destination in the future. The Pymont Peninsula Place Strategy indicates that by 2041 the Peninsula will support 60,000 workers, representing an increase of around 23,000 workers over the period from 2017 to 2041.

It is important to consider this employment target against others across central Sydney, where a number of existing and future precincts are also projected to accommodate large levels of future employment. Some of these precincts include the CBD but also emerging corridors and precincts such as Central to Eveleigh and Botany Road Corridor.

The City of Sydney Local Strategic Planning Statement indicates that over 100,000 jobs are planned within Central Sydney over the period to 2036 (Central Sydney encompasses the CBD and extends south and west to include Darling Harbour, Central and UTS). In total, the Eastern City District Plan has identified targets for the City of Sydney to deliver at least 165,000 jobs and up to 266,000 jobs by 2036.

With regard to commercial office floorspace, based on known developments and future projects, it is estimated that there is around 1,000,000m² of commercial office supply either planned or underway within the Sydney CBD, that is due to complete over the next 10 years. This includes a large proportion of development focused around Barangaroo, Circular Quay and Central Station. These developments will support significant jobs growth within Central Sydney, in addition to other emerging markets.

The Pymont Peninsula Place Strategy outlines that around 23,000 jobs are planned to be provided, with the Pymont Peninsula Economic Development Strategy (EDS) indicating that up to 823,000m² of additional Net Lettable Area (NLA) floorspace would be required, of which around 377,000m² is suggested to be designated for office use.

In the longer term, additional commercial development is likely to be associated in close proximity to the future Metro West station developments, including around the future Pymont Metro Station, which is planned to be located around Union Street and Edward Street. This infrastructure is seen as a catalyst for additional commercial office development within the region including the Bays Market Precinct and the subject site. While the precinct will support additional commercial uses, research associated with the proposed commercial office space requirements for the precinct appear largely untested; this includes results from the Pymont Peninsula EDS as well as the study undertaken by HillIPDA which investigated floorspace requirements in Blackwattle Bay (which includes the subject site).

The HillIPDA Economic Development, Local Retail and Services Study, which was prepared in early 2021, does not include a thorough commercial market assessment to justify the quantum and mix of uses allocated to the various sites across Blackwattle Bay. The Study notes that demand in Pymont is largely from small to medium-sized businesses, attracted to the lower rents offered in fringe-CBD markets and outlines this is a driver for future demand in the precinct. However, this is not considered against commercial viability of development, which often requires securing larger anchor tenants, at a moderate rent, to reduce leasing risk and secure a future income stream before commencing development. In determining the quantum and composition of commercial floorspace the Study has not adequately considered the implications of new supply planned in fringe locations (e.g. Central to Eveleigh and Botany Road Corridor) combined with the subdued conditions post COVID-19 (despite referencing these factors). Furthermore, while highlighting the potential appeal of the precinct to small to medium-sized innovation tenants, the Study also notes the 'weak' potential for

Blackwattle Bay to attract anchor institutions or firms – which it notes is a key success factor for innovation precincts and ‘would be critical for the precinct’s success’.

As a result, while it is clear that Pyrmont will support a level of future employment growth and commercial floorspace in the future, the Sydney CBD and Central Precinct will remain the key focus areas for major commercial office development based on the substantial provision of future supply. Government policy and market demand will continue to support growth in in these key precincts, along with other emerging office and innovation precincts on the fringe of the CBD.

Market conditions within the commercial office sector are challenging, and while the long term implications of COVID-19 are yet to fully understood, it is likely that the high profile, well connected, CBDs and core commercial markets will remain the key destinations for the majority of commercial occupiers in the future. This is particularly true for major anchor tenants who are often required to be secured prior to commencement of a major development.

While there is likely to be some demand for commercial office uses in Pyrmont in the longer term, it is clear that commercial floorspace in Pyrmont will operate within a highly competitive market, whereby future developments will attempt to attract small to medium occupiers from other larger CBD markets, including the Sydney CBD and other emerging fringe locations. This will be particularly difficult in subdued market conditions, or against the planned wave of future supply. As such, it is likely that commercial office stock in Pyrmont may remain challenging, with long term delays or vacancies likely until such time as stock in the CBD and other emerging fringe locations is development and absorbed.

3.0 Market Outlook

3.1 Market Outlook Modern Office Tenant Requirements

Tenant demands and requirements within the commercial office market are continually evolving. In recent times, there has been a move towards more open plan, flexible spaces that provide collaborative workspaces, seamless integration with technology and incorporate sustainability initiatives.

Market sounding and research undertaken by this office across Sydney metropolitan office markets relating to tenant and occupier requirements indicate the following:

- Occupiers have a preference for prime quality buildings with available space that provides large contiguous floorplates with efficient building layouts and high quality design.
- Preferred floorplates for major occupiers are whole floors with large floorplates of at least 1,500m² or larger.
- Occupiers seek high-quality spaces that typically achieve sustainable and wellness outcomes including NABERS, Green Star and WELL ratings.
- Tenants want flexible spaces that allow for up and down scaling, active working spaces that enable collaboration internally and externally, and 24-hour access.
- Co-location and clustering benefits are important, including being within activated spaces that offer retail amenities, outdoor open space, and accessibility to public transport.
- There is a strong need for flexibility including:
 - Floorplates that are efficient and flexible – enabling more collaborative spaces
 - Adjustable spaces based on changing requirements
 - Best in class technology to support a mobile workforce
- Need for sustainability and wellness initiatives.

A key demand driver in metropolitan office markets is the provision of prime office stock across large contiguous floorplates. This is due to requirements of modern occupiers and businesses that typically prefer large contiguous spaces, allowing a company to locate on one, or more interconnected floors rather than across multiple levels. This is beneficial for corporate headquarters and major occupiers who seek to establish a head office and seek improved connectivity, collaboration as well as workplace flexibility that appeals to their broad workforce. This is evident at Google's Australian Headquarters, located at 'Workplace 6' in Pyrmont across multiple levels with a typical floor area of 3,600m².

In metropolitan office markets the benefits offered to tenants include large floorplates to enable 'campus style' corporate facilities, including customised fit-outs and experiences that align with the desired corporate culture and vision, all for a more affordable price point. In the Sydney CBD and North Sydney, typical floorplates for modern developments are in the order of 1,300-1,500m². For commercial office uses at the Bays Market Precinct, this will mean providing facilities that can compete with other metropolitan office markets and emerging technology precinct such as South Eveleigh and Tech Central, where larger floorplates are provided. In the case of Macquarie Park and South Eveleigh, floorplates can be in excess of 3,000m², and are aimed at attracting large businesses seeking 'campus' style facilities in a fringe or suburban market. This is evident through the establishment of Commonwealth Bank as the anchor tenant at South Eveleigh, which consolidated a number of offices across Sydney into a single location and leased around 90,000m² at the precinct.

There is a requirement to attract and retain occupiers and employee talent from across Sydney, not just within Pyrmont. A review of recent major tenant precommitments across Sydney office markets suggest the following trends and requirements:

- Need for large, efficient floorplates (open plan and flexible spaces) to support a central headquarters for business over fewer but larger contiguous levels.
- Need for excellent access and amenity in the building and immediate area in order to attract and retain occupiers and staff.

- A unique built form and physical environment provides a key attractor and point of difference for some businesses.

These attributes are even more important in a post-COVID environment where larger, flexible floorplates will enable businesses to create safe 'return to work' environments and enable maximum flexibility for workspace layouts and collaboration areas.

The implication for the subject site, which incorporates a smaller land area compared to other locations throughout Sydney (and Pyrmont), is that the ability to secure a major anchor tenant would be substantially diminished. This would have significant implications on the delivery and overall development viability of the site in the future.

3.2 Location requirements

There are a range of locational drivers and attributes that act as key success factors for commercial development including:

- Proximity to public transport
- Proximity to other businesses for clustering/knowledge hubs
- Proximity to retail and amenities
- Proximity to public open space
- Proximity to workforce

While Pyrmont responds positively to the majority of these attributes, the Sydney CBD provides higher appeal in a large number of areas, further highlighting the attraction of centrally located markets such as the Sydney CBD as compared to fringe markets such as Pyrmont.

Overtime Pyrmont has transitioned away from commercial uses towards a true mixed-use precinct including a higher provision of residential dwellings. This shift is reflective of Pyrmont's role as an important inner-city destination that supports the live, work and play objectives outlined by a range of government policies and strategies.

Creative and technology companies form a large component of tenant demand in Sydney fringe markets such as Pyrmont, with these types of occupiers often seeking large 'campus' style offices including existing tenants such as Google. These types of occupiers can prioritise establishing a 'hub' in a central location for their workforce rather than focus on clustering benefits with other businesses.

It is noted that the location of the Pyrmont Metro Station was recently announced at 37-69 Union Street. While this will significantly improve Pyrmont's accessibility and locational attributes more broadly, it will still remain secondary to other core commercial office markets such as Sydney CBD, and North Sydney. Commercial office floorspace has been identified within the Bays Market Precinct as a key use in the longer term, with much of the justification for this use due to the improved transport infrastructure associated with the future metro. The State Government controls land to the south of the subject site and has also announced plans to accommodate a substantial provision of commercial office floorspace on this land in the future.

In relation to the Poulos Bros site, this will be further from public transport links including the future Pyrmont Metro Station, and the main intersection and activity node to the south that is situated on Government landholdings.

In its current proposed form, the subject site is also more constrained by its physical position and layout and as such, the ability to deliver larger floorplates that are able to accommodate "campus" style facilities will be compromised. This compares to the larger size and high profile location of the adjoining Government landholdings which is considered a more desirable commercial office destination due to stronger locational attributes, including closer and more direct access to the future metro station.

The Government owned landholdings are more appropriate to offer the required office design and configuration that appeals to major occupiers in this type of location. This is due to the larger site area and therefore capability to offer large campus style facilities on these sites, as well as the stronger locational attributes, including positioning on a high-profile corner, close to open space, excellent site accessibility and within close walking distance to Pyrmont Metro Station. As such, a more flexible floorplate use, design and configuration should be considered at the subject site in order to attract and appeal to the types of residents and occupiers more likely to locate in Pyrmont in the future.

3.3 COVID-19 Implications

Office tenant requirements in the post-COVID-19 environment remain uncertain. However, several trends are unlikely to change, including the importance of technology enabled workspaces and the ability to provide a safe and healthy work environment, which will remain more important than ever in the post-COVID world.

The current global pandemic has had a significant impact and transformation on commercial office working environments. COVID-19 has resulted in the requirement to work from home for many industries, particularly during the height of the pandemic, with impacts to commercial office market demand.

The result of COVID-19 will mean that the way businesses and office tenants use their space will continue to evolve. In response to the pandemic, commercial office buildings will play a central role in the recovery and enhance opportunities to improve the way we work in a safe environment.

A review of key changes and future tenant requirements resulting from COVID-19 are now highlighted. Data has been sourced with reference to industry publications including a recent tenant survey conducted by CBRE in July 2021 which focused on the future of office spaces and tenant requirements.

Key findings include:

- More companies are adopting hybrid working, where close to 50% of respondents indicated that they will encourage employees to work in the office, however allow them to work from home if desired.
- Less employees are wanting to work in the office 'all the time', down from 37% in 2020 to 26% in 2021, with many of these respondents wanting to work from home 1-2 days per month.
- Flexible workspaces are at the forefront of office design, with many tenants seeking to increase use of flexible office spaces (30-35%) or seek a 'flight to quality' for more prime grade building spaces (20-25%).
- Around 10% of respondents indicated a desire to relocate to CBD fringe markets and decentralised locations to diversify portfolios by establishing 'satellite' offices.
- Physical workplaces are outlined as more important than remote working for productivity, collaboration, company culture and engagement, innovation and employee learning. Remote working is considered 'better' for employee health and wellbeing. This lends itself to a 'hybrid' model in the future.
- Tenants are seeking changes to physical workspaces, including more collaborative and communal spaces for informal communication and socialising, meeting rooms for five people or less, and dedicated team areas.
- Despite short term changes to workspace densities from social distancing, anecdotal evidence suggests that office space densities per capita will remain similar to existing levels, however, the same space will be used differently. . In the City of Sydney LGA, workspace densities were as low as 10.1m² per worker for open plan and partitioned office space pre-COVID (*City of Sydney Floor Space and Employment Survey 2017*).
- Australian based companies are seeking more open plan offices, with "hot desking" and different work settings throughout, highlighting the demand for flexible and collaborative workspaces.
- Increased focus on technology, wellness and sustainability to enhance user experiences within a building are a key driver.

Results sourced from CBRE July 2021 Future of Office Survey

These changing tenant requirements highlight that hybrid models, including remote working are likely to be the way of the future. Higher quality, prime spaces that offer high levels of flexibility, amenity and services to occupiers are critically important in attracting workers back to physical workspaces. Creating destination workspaces that seamlessly integrate technology, sustainability, collaboration and tenant wellness under one roof will be critical. The importance of large floorplates that offer workspace efficiency and flexibility in an office are increasingly important in achieving a modern office environment that is sought by major occupiers.

Market uncertainty associated with COVID-19 is also evident through recent occupier activity, with some examples in Sydney over the last 18 months including investigations or actions by larger corporate occupiers such as Westpac, Telstra, QBE, Norton Rose and Ashurst to consolidate offices, or reduce their floorspace requirements by subletting space.

The results from the above indicate that the subject site within the Bays Market Precinct is less likely to be able to deliver the large campus style floorplates required in Pymont and in order to adequately secure major anchor tenants or compete with other markets and new supply. When combined with uncertainty associated with COVID-19 and the implications on current and future market conditions, imposing a minimum requirement for commercial office floorspace on the Poulos Bros site would appear to represent a real risk to future development of the site.

4.0 Summary

This high level economic review of the potential for commercial office floorspace at the Poulos Bros site outlines a number of key implications associated with a strict requirement of commercial floorspace at the site proposed under the Bays Market Precinct SSP. These are summarised as follows:

- The Bays Market Precinct is positioned within a relatively isolated precinct, west of Bank Street and with limited nearby commercial office hubs nearby. The newly announced Pymont Metro Station is located some 800m east of the precinct.
- Pymont is a small office market, with around 270,000m² of commercial office floorspace estimated to be provided. The majority of this floorspace is supported at the northern peninsula of Pymont, close to the Sydney CBD, with smaller hubs are located at Darling Island, Jones Bay Wharf, and John Street. It is worth noting that these precincts are located some distance from the planned Bays Market District. The current Place Strategy proposes significant amounts of additional commercial office floorspace in the future, however, the viability and justification for this future requirement, and the allocation across sites in Blackwattle Bay, is largely untested.
- Over the past 12 months, metropolitan office markets including within Greater Sydney have deteriorated in response to ongoing public health orders to 'work from home' due to the COVID-19 crisis. The first two quarter of 2021 in Sydney resulted in some respite within the office market as workers returned to physical office spaces, however the latest lockdown in NSW coupled with major supply completions has seen an increase in vacancy which is approaching 10% in the Sydney CBD. Similarly, across other fringe markets, vacancy remains elevated.
- Established and emerging office markets across Sydney will continue to play a prominent role in the delivery of employment and economic recovery post COVID, and will be key in bringing people back to physical workspaces. Several major markets have strong employment growth targets and large development pipelines, particularly within the Central to Eveleigh Corridor and the Sydney CBD, which combined account for around 1,000,000m² of proposed commercial office floorspace. These markets will remain key competitors for Pymont and specifically for future office development within the Bays Market Precinct.
- While the long term implications of COVID-19 are yet to be fully understood, it is clear that the pandemic has emphasised the evolution of traditional workplaces, with an increased desire by modern occupiers for flexible workspaces that enable hybrid working models, with a key focus on collaboration, open plan working, technology and staff wellness.
- The Poulos Bros site is unlikely to represent a key location for commercial office floorspace. This is attributed to the fact that the site does not align as strongly as other sites or markets with typical success factors for commercial office space, including locational requirements of being close to an established workforce, public transport and in fringe and suburban markets that cater for large "campus" style facilities.
- The Government owned landholdings within the precinct, to the south of the subject site, would appear to have stronger locational attributes, including being in a higher profile location, closer to the future Pymont Metro Station, and therefore more capable of providing larger floorplates across the site. Accordingly, a greater proportion of overall commercial office space within the Bays Market Precinct could be considered for this landholding, which could provide higher levels of amenity and more effectively appeal to future occupiers compared to the subject site.
- Imposing a restrictive floorspace requirement on the subject site may impact on the future redevelopment potential of the site due to limited commercial tenant interest (particularly in the short to medium term) and therefore limited commercial viability. The result may be an underutilised site, or undeveloped site, in the longer term. A more flexible range of uses and approach should be considered whereby private landowners will be able to adapt and respond to market demand in order to deliver future development that aligns with the government vision for the precinct in the longer term.

The Bays Market Precinct plan represents a visionary project for Pymont that will embody a contemporary non-CBD precinct, delivering not only commercial office floorspace, but also supporting community uses and housing that will create an active, vibrant destination for a range of users and residents. However, as highlighted in this report, there remains ongoing uncertainty and instability in Sydney's commercial office market, and at a broader level, Pymont represents a relatively small commercial office market in a highly competitive sector.

As such, there is a need for greater flexibility at the subject site in order to allow the site to adapt and respond to market demand as it continues to evolve over time, particularly in a post-COVID environment. Imposing a 56%

floorspace requirement for non-residential uses at the site will increase commercial risk and the viability of any future redevelopment due to the challenge of successfully leasing commercial office floorspace, including to major occupiers. Such a requirement would have implications on the broader targets and success of the Bays Market Precinct.

Reflecting the uncertainty in the commercial office market, and the location of the Site in a non-CBD market, adding flexibility in terms of uses will ensure the development has a greater chance of being delivered sooner, and remaining viable over the longer term, for the benefit of strengthening the role of this strategic location. By providing greater flexibility of uses at the Site, the development will have the ability to provide commercial office floorspace that is aligned to inner-city fringe market demand and tenant needs at any given time, while also enabling the delivery of other uses that may better respond to market demand as required.

The review outlines that the future of the Sydney commercial office market remains uncertain and is evolving, and that more flexibility in terms of uses at the Site would be better suited to respond to occupier needs over time, or enable the effective delivery of other uses that align with market demand, particularly in the short to medium term. Providing flexibility in terms of uses at the site will ensure better longevity and viability into the long term for both the Site and the precinct, creating enhanced built form and community outcomes that align with the strategic vision for the Bays Market Precinct.

Appendix C. Acoustic Assessment

BAYS MARKET PRECINCT REDEVELOPMENT (POULOS BUILDING)

Acoustic Advice Regarding Land Use

20 August 2021

Ethos Urban

TM263-01F01 Acoustic Advice Regarding Residential Use (r1)

Document details

Detail	Reference
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Prepared for:	Ethos Urban
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Attention:	Tom Goode

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We have derived data in this report from information sourced from the Client (if any) and/or available in the public domain at the time or times outlined in this report. The passage of time, manifestation of latent conditions or impacts of future events may require further examination and re-evaluation of the data, findings, observations and conclusions expressed in this report.

We have prepared this report in accordance with the usual care and thoroughness of the consulting profession, for the sole purpose described above and by reference to applicable standards, guidelines, procedures and practices at the date of issue of this report. For the reasons outlined above, however, no other warranty or guarantee, whether expressed or implied, is made as to the data, observations and findings expressed in this report, to the extent permitted by law.

The information contained herein is for the purpose of acoustics only. No claims are made and no liability is accepted in respect of design and construction issues falling outside of the specialist field of acoustics engineering including and not limited to structural integrity, fire rating, architectural buildability and fit-for-purpose, waterproofing and the like. Supplementary professional advice should be sought in respect of these issues.

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1 Introduction

Renzo Tonin & Associates was engaged to provide acoustic advice with respect to the Poulos Building within the Bays Market District redevelopment project.

Specifically, we have been asked to comment on whether a residential use can be accommodated on lower levels (below level 9) without resulting in unacceptable adverse impact on the acoustic amenity of a future occupant. (At present, we understand that any floor level below Level 9 will be required to have a non-residential use).

In short:

- The purpose of this letter is to demonstrate that there will be design options available for the Ground to Level 8 spaces that can enable some degree of residential use without excessive noise impact. Design options such as building footprint shape, orientation of windows, wintergarden/balcony design and setback all can be used to address road traffic noise to meet appropriate residential acoustic standards.
- Most importantly, these standards can be met without relying simply on a “windows closed/air-conditioning on” design. There are design options available that consider both the noise impact and the provision of natural ventilation to the apartments.
- That being the case, residential use should be included as a potential permissible use from ground floor to level 8 (with a detailed design to be determined at Stage 2 Development Application). It should be open to the proponent to include residential uses on these levels provided that issues of acoustic amenity are addressed suitable at stage 2 Development Application.

This report also provides commentary on a concept plan for the site by Ethos Urban

2 Site Description

The Poulos Building lies on the northern edge of the Bays Market Precinct (Blackwattle Bay, Pyrmont). It is the western most of a series of proposed towers that will lie adjacent to the Western Distributor.

Being a major arterial road, the Western Distributor generates high levels of road traffic noise and will impact the northern (and to a lesser degree eastern and western facades of the Poulos Building).

To the south of the site lies Blackwattle Bay, and includes both a fish market (proposed to be developed) and marina, which will also have operational noise impacts, but to a much lesser degree.

At present, we understand that any floor level below Level 9 will be required to have a non-residential use.

Location of Poulos Building and its precinct context is shown below:

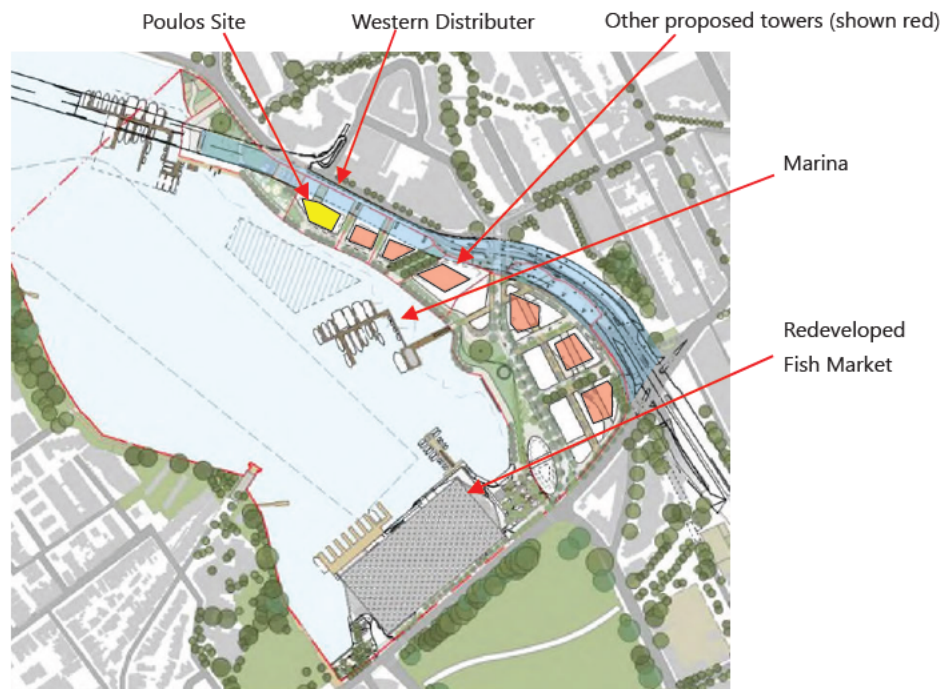


Figure 1 – Poulos Building/Site Context

3 External Noise Intrusion Criteria

The following acoustic standards and guidelines will be considered:

- State Environment Planning Policy (Infrastructure) 2007 ('ISEPP') and Department of Planning (DoP) publication "*Development Near Rail Corridors & Busy Roads – Interim Guideline*" 2008 ('DoP Guideline')
- Sydney Council Development Control Plan 2012 (effective 14 December 2012).
- The Apartment Design Guideline.

These documents provide standards and guidance for residential development in areas affected by external noise, including road traffic.

3.1 ISEPP/ DoP Guideline

Given the average daily traffic volume on the Western Distributor exceeds 40,000, the requirements set out by the ISEPP are applicable to the site.

Table 1: ISEPP Internal Noise Criteria

Condition	Occupancy	Design Internal Noise Level
Windows closed	Bedroom (10pm – 7am)	35dB(A) _{Leq(9hr)}
	Living / Dining /Kitchen (24 hours)	40dB(A) _{Leq(15hr)}

In addition, Department of Planning Guideline identifies internal noise goals under window open conditions. In the event that this noise goal is exceeded when windows are left open, supplementary ventilation (natural or provided by fan) should be provided.

Table 2: Department of Planning Trigger for Provision of Supplementary Ventilation

Condition	Occupancy	Design Internal Noise Level
Trigger for provision of supplementary ventilation	Bedroom (10pm – 7am)	45dB(A) _{Leq(9hr)}
	Living / Dining /Kitchen (24 hours)	50dB(A) _{Leq(15hr)}

3.2 Apartment Design Guideline

The Apartment Design Guideline (Section 4J) provides significant design guidance with respect to the design of buildings in noise affected areas.

With respect to the application of the ADG:

- Although there are sections in the ADG that set numerical performance targets, there is no numerical performance requirement with respect to noise levels in section 4J. This must be considered a deliberate decision.
- The introduction of the ADG states that demonstration of compliance for sections not containing numerical targets is shown through adopting the Design Guidance. The fact that the introduction to the ADG explains how to demonstrate compliance for sections that do not set performance requirements is further evidence that not applying a numerical performance requirement was a deliberate decision, and not an omission.
- To apply a numerical target for an internal noise level that is based on a DCP or some other document is clearly not consistent with the ADG. Pursuant to clause 6A of SEPP65:

6A Development control plans cannot be inconsistent with the Apartment Design Guide.

(1) This clause applies in respect to the objectives, design criteria and design guidance set out in Parts 3 and 4 of the Apartment Design Guide for the following...

(g) natural ventilation

(2) If a development control plan contains provisions that specify requirements, standards of controls in relation to a matter to which this clause applies, those provisions are of no effect

Specific design guidance is summarised below.

Objective 4J1 – Design Guidance and Response:

To minimise impacts the following design solutions may be used:

- *Physical separation between buildings and the noise or pollution source.* This could include set back or a physical obstacle (noise screen).
- *Residential uses are located perpendicular to the noise source and where possible buffered by other uses.*
- *Non-residential buildings are sited to be parallel with the noise source to provide a continuous building that shields residential uses and communal open space.*
- *Non-residential uses are located at lower levels vertically separating the residential component from the noise or pollution source.*
- *Buildings should respond to both solar access and noise. Where solar access is away from the noise source, dual aspect apartments with shallow building depths are preferable.*

- *Landscape design reduces the perception of noise and acts as a filter for air pollution generated by traffic and industry.*

Objective 4J2 – Design Guidance and Response:

Design solutions to mitigate noise include:

- *Limiting the number and size of openings facing noise sources.*
- *Providing seals to prevent noise transfer through gaps.*
- *Using double or acoustic glazing, acoustic louvres or enclosed balconies.*
- *Using materials with mass and or sound insulation or absorption properties eg solid balcony balustrades, external screens and soffits.*

3.3 City of Sydney

Given the project is a State Significant Development, the Local Council (City of Sydney) is not the consent authority.

Relevant sections in the Sydney City Council DCP (section 4.2.3.11) are presented below for information purposes (the ISEPP, Department of Planning Guidelines and ADG would be considered to be higher order documents).

Relevant acoustic criteria from the City of Sydney DCP are as follows:

Table 3: City of Sydney Internal Noise Criteria

Condition	Occupancy	Design Internal Noise Level
Windows closed	Bedroom (10pm – 7am)	35dB(A) _{Leq worst 1hr}
	Living / Dining /Kitchen (24 hours)	45dB(A) _{Leq worst 1hr}
Windows open	Bedroom (10pm – 7am)	45dB(A) _{Leq worst 1hr}
	Living / Dining /Kitchen (24 hours)	55dB(A) _{Leq worst 1hr}
Windows closed and air-conditioning on*	Bedroom (10pm – 7am)	38dB(A) _{Leq worst 1hr}
	Living / Dining /Kitchen (24 hours)	48dB(A) _{Leq worst 1hr}

*Applies in the event that the “windows open” noise goal cannot be met at a particular site.

3.4 Proposed Design Approach

Proposed approach for any design relating to residential use below level 8 in order to address the above standards is as follows:

- Façade design (glass thicknesses) must be sufficient to ensure that internal noise levels with windows closed complies with the ISEPP (table 1).

- Acoustic design should adopt *design guidance* from the Apartment Design Guideline, where feasible.
- Acoustic design should be conducted with a view to providing a natural/passive ventilation path to apartments while minimising external noise transmission.
- An internal noise goal of 45dB(A) (bedrooms) and 50dB(A) (living areas) under naturally ventilated conditions will be targeted (being consistent with the *Development Near Rail Corridors and Major Roads* trigger level for supplementary ventilation). This is adopted as a "natural ventilation" noise target as implicitly the DoP trigger level implies that it is acceptable to have internal noise levels of up to 45/50dB(A) in situations where a natural fresh air source is provided. However, this is a guideline, but not an enforceable criteria. (To make a numerical (noise level) outcome mandatory cannot be enforceable pursuant to SEPP 65 clause 6A).
- Apartments would also be provided with mechanically supplied supplementary mechanical ventilation.

Not all design ADG guidance options would be applied in all instances. Appropriate design guidance items would be adopted where appropriate. At the subject site:

- The most pertinent item will be that window orientation and use of wintergardens designs will be far more effective than a simple prohibition on residential use below Level 9.
- This is because window orientation/winter garden designs can provide more 10dB(A) benefit, where as a simple restriction on levels where residential use is permitted will provide a 2-3dB(A) improvement at most (as noise level does not decay very quickly with building height).
- A commercial podium design (as effectively becomes required by prohibiting residential development below level 9) is less effective at sites where the noise source is elevated (as is the case at the subject site). Other acoustic design options are more appropriate at this site.

4 Noise Level Survey

An acoustic survey of existing and future noise impacts within the precinct was undertaken as part of a *State Significant Precinct Study* (June 2021). An acoustic report was included in Attachment 18 of that report – the *Noise and Vibration Assessment* (SLR report, dated 31/5/2021). Key findings in the *Noise and Vibration Assessment* were as follows:

Table 4: External Noise Levels

Condition	Noise Source	Noise Level	
		Day (dB(A) _{L_{eq}(15hr)})	Night (dB(A) _{L_{eq}(9hr)})
North Façade (approx. 7m from nearest lane)	Road Traffic	75 – above Western distributor deck level*	72 – above Western distributor deck level*
		71 – below Western distributor deck level*	67 – below Western distributor deck level*
South Façade	Road Traffic.	50-69**	50-66**
	Marina Noise, Fish Market Operational Noise	50-63**	<50**

*Refer to noise logging data in pdf page 110 of SLR Report (extracted, Appendix 1, also Figures C1, C3 in Appendix B).

**Refer Figures C5, C7, C10 and C12 in SLR report (extracted in Appendix C).

These noise levels are used in the assessment of the viability of residential uses for the lower levels of the Poulos Building, discussed below.

5 Commentary / Discussion

Strictly speaking, there is no planning control prohibiting a design where the building façade is provided with a level of acoustic treatment to ensure that there are suitable internal noise levels (double glazed system):

- With windows closed, façade glass/materials would be provided such that an internal noise level of 40dB(A) in living rooms and 35dB(A) in sleeping areas will be achieved.
- Precise glass thicknesses to meet acoustic requirements depend on window size and position in the building, and would be determined at Sage 2 DA.
- Fresh air is provided by a mechanical ventilation system. The occupant would still be free to open a window, at which time they would become noise impacted.

However in addition to this, consideration will be made with respect to the provision of natural ventilation and its acoustic impact. The Stage 2 design would be conducted reduce reliance on a “windows closed/air-conditioner on” design and provide the occupants with both natural provided fresh air without excessive road noise impacts.

Design options are detailed below. The discussion below is broken into two sections:

- Firstly, some general design principals are outlined. These relate to set back, balcony design, acoustic/passive ventilators, and use of cross ventilation in order to more efficiently ventilate apartments using small window opening sizes (and therefore getting acoustic benefit as a result of the small window opening size).
- Secondly, the general design principles are then applied to the site to demonstrate their viability specifically to the Poulos Building.

5.1 General Design Options.

Typically, there is a 10dB(A) noise reduction between the outside noise level and the inside noise level (assuming the window is open to naturally ventilate the apartment). This will be referred to as the “open window” design.

This 10dB(A) outside/inside noise reduction can be improved through additional design elements such as set back, building/window orientation and balcony design.

Given the high external noise levels at the site, more than 10dB(A) noise reduction between outside and inside is needed in order to maintain reasonable acoustic amenity when still providing window openings for natural ventilation. The following sections indicate how the further improvement achieved through good acoustic design.

5.1.1 Set Back, Apartment Layout and Building Orientation

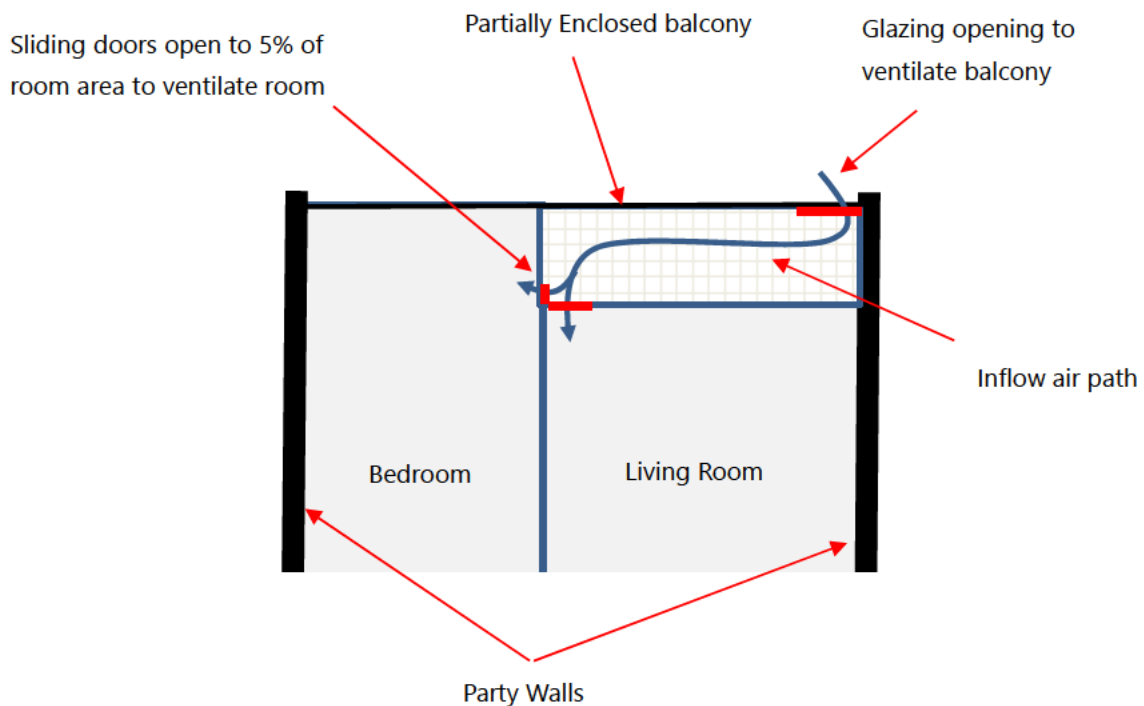
Set back provides a small acoustic benefit. Typically, there will be a 2-3dB(A) improvement achieved by doubling the setback from road to building façade.

Building shape plays an important role in noise screening. Facades perpendicular to the road typically experience 3dB(A) less noise exposure compared to one directly incident to the road. As the orientation turns further away than 90 degree (ie – it is facing slightly away from the road), the benefit gets even more pronounced (3-10dB(A), depending on angle).

Finally, apartment layout is important. Locating rooms such as bathrooms or storage on the noise affected façade and locating noise sensitive spaces on the more protected facades can provide significant acoustic benefit. For a site such as this, where there is only one primary noise source, this simple design measure will be very effective.

5.1.2 Winter Garden and Sliding Door Design.

Having a wide (4-5m) shallow balcony outside an apartment living room creates a natural ventilation opportunity. Passive ventilation in this scenario is provided by having the wintergarden to external window open at one end of the balcony, and the sliding door from living room to balcony open at the opposite end of the balcony area. An indicative sketch for a one-bedroom apartment is shown below. Design such as this will provide a further 5-7dB(A) benefit compared to a simple “open window” design.



5.1.3 Balcony Design

Using the balcony balustrade to act as a noise screen and providing ventilation via a low height window to the room (below balustrade level) is a further design option. This can be used for apartments with a relatively deep balcony (more than 2m). The design requires use of a solid balustrade (no gaps), a noise absorptive lining to underside of balcony over (50mm Echosoft) and a low level openable window to the room (below balustrade height for the purpose of ventilating). Typically, this approach can be used for apartments 6 levels or further above road deck and is of limited use for apartments on Levels 0 to 8.

5.1.4 Passive Acoustic Ventilators

A passive acoustic ventilator allows fresh airflow into an apartment without relying on a fan. By incorporating noise absorptive elements into the ventilator, the airflow can be provided while still reducing noise from outside to inside.

An acoustic ventilator (often called an acoustic plenum) will often consist of a length of internally insulated ducting or similar running from a façade opening and into the apartment ceiling space (allowing airflow from outside to inside). The longer the plenum, the more noise it removes (however the greater the spatial problems to incorporate it, and the greater the necessity to ensure that the airflow through the plenum is not restrained to the degree that natural airflow stops occurring).

This requires coordination with a ventilation consultant, however plenums provide up to 12dB(A) improvement compared to a simple "window open" solution (meaning a 22dB(A) outside/inside noise reduction).

5.1.5 Use of Cross Ventilation to Reduce Window Opening Sizes

Typically an apartment bedroom will require an open window area of approximately 5% of the floor area of the room. However, in the event that apartment is cross ventilated, the size of this opening can be reduced while maintaining suitable airflow to ventilate the room. Commonly, this open area will become approximately 1.25% of the floor area of the room. This provides 6dB(A) benefit compared to a "window open" scenario.

5.1.6 Combination of Treatments

Both the most part – the above treatments can be combined to provide further benefit. A winter garden + acoustic ventilator design in particular can provide very significant acoustic benefit (approximately 30dB(A) outside inside/noise reduction).

5.2 Design Options Appropriate for This Site.

With windows closed, façade glass/materials would be provided such that an internal noise level of 40dB(A) in living rooms and 35dB(A) in sleeping areas will be achieved (as required by ISEPP). Precise glass thicknesses to meet acoustic requirements depend on window size and position in the building, and would be determined at Sage 2 DA.

Natural ventilation design options are reviewed below.

5.2.1 South, East and Western Facades - Apartment layout and building form design.

The noise level incident on the southern façade (overlooking the Market Precinct) is significantly less compared to the northern façade (overlooking the Western Distributor). See below. For the purpose of discussion, the noise levels discussed below are Daytime noise levels. Night time noise levels will be approximately 3dB(A) quieter again,

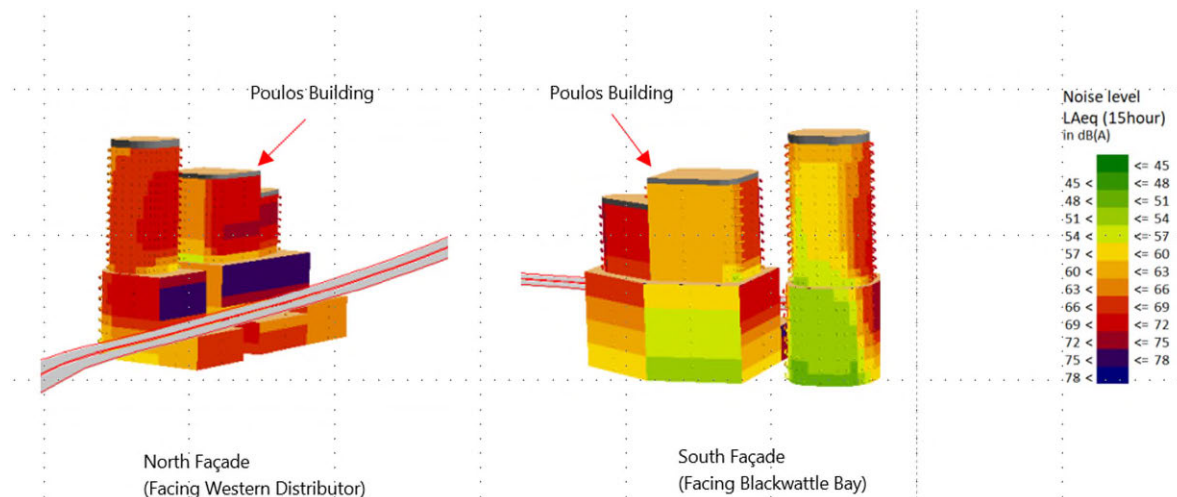
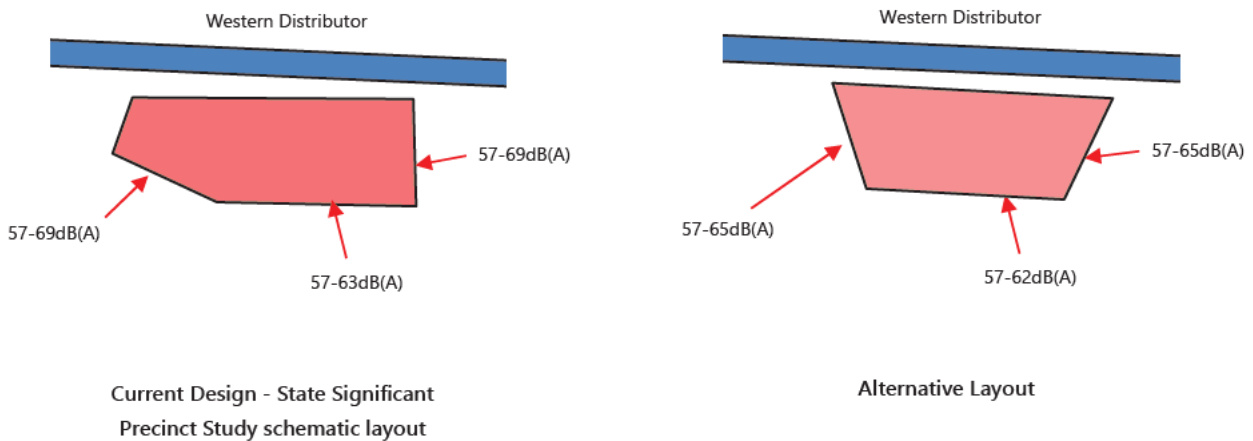


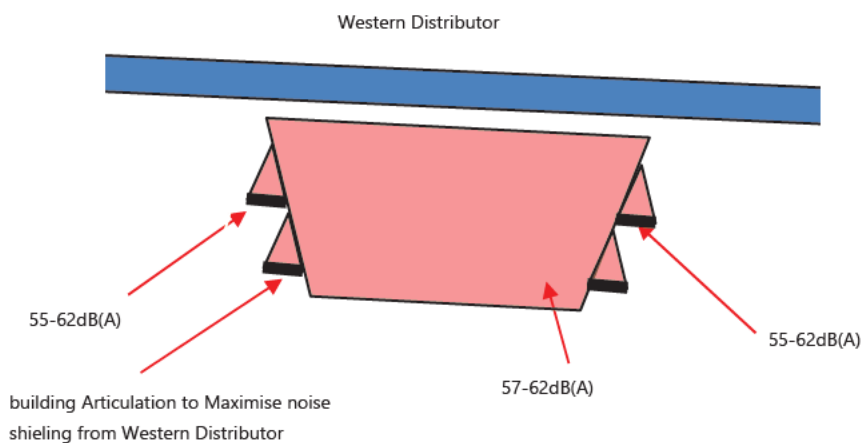
Figure 1 – Façade Noise Map (Extracted from SLR *Noise and Vibration Assessment* dated 31/5/2021.

As shown, noise levels on the southern façade range between 51-69dB(A) (daytime levels). ON the southern façade, the higher noise levels (shown in red) are arise primarily as a result of the angled building form (creating a greater degree of exposure to Western Distributor noise. The more shielded parts of the southern façade have much lower noise level 51-63dB(A), *with the quieter areas being below level 9*. At 51dB(A), a simple “open window” design becomes feasible (ie – suitable internal noise levels are achieved even if windows are just left open in order to ventilate the apartment)

An amended building footprint can be used to improve natural ventilation opppurtunities:



Further, the design of the east and west façades can further mitigate external noise:



Articulation Design to East/West Facades

With respect to the above:

- The noise level identified above change depending on the level within the building. The lower the level within the building, the lower the noise level.
- For apartments on Level 8 or below, noise levels of below 60dB(A) are anticipated through changes in building foot print design. This means a “windows open” solution (ie – ventilation via standard window opening, and no acoustic plenum and achieving an internal noise level of no more than 50dB(A)) is likely to be viable.
- There also remains further design options such as use of winter gardens, use of cross ventilation to reduce open window areas or acoustic plenums if necessary.

5.2.2 Northern Façade - Set back, Winter Garden and Acoustic Plenums

This façade faces the Western Distributor (both above and below road deck level).

At present, the noise levels indicated in table 1 are based on a 7-8m setback from road edge to building façade. It is proposed to increase this setback to 14m. While this is by no means a complete solution:

- It will provide approx. 2dB(A) benefit.
- More importantly, it will provide a setback similar to other residential towers in the Bay Market Precinct where the restriction on residential use from Level 9 and above is not applied.

With respect to the northern façade:

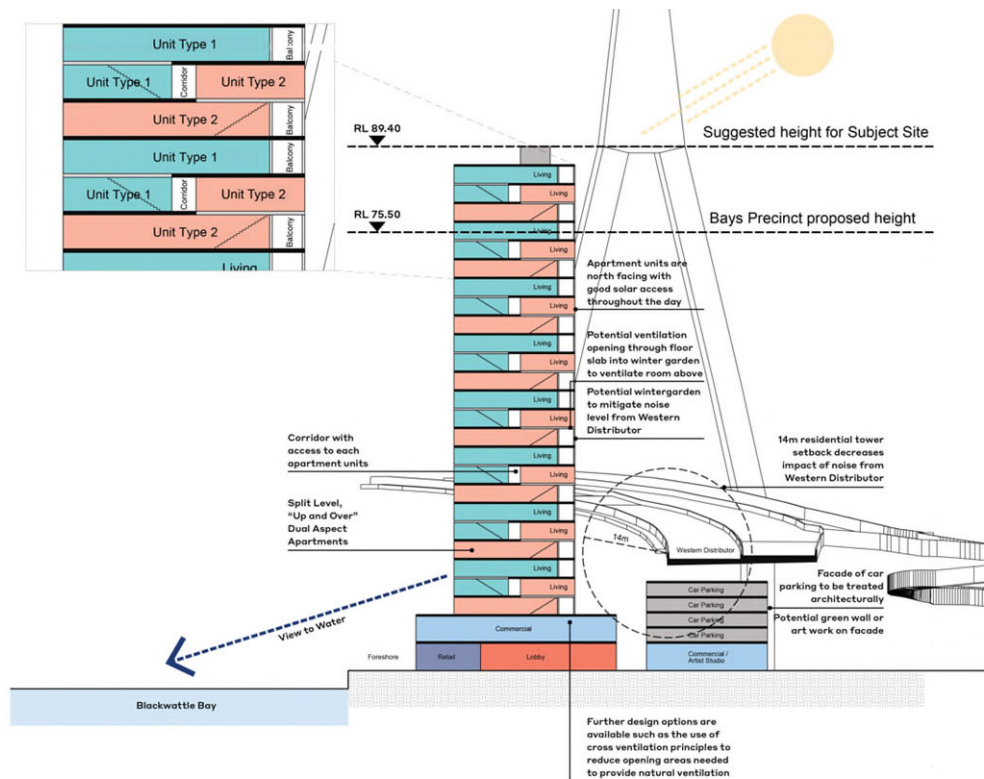
- Obviously one design option will be to simply locate apartment amenity or storage areas (or common areas) on this façade and have bedroom and living areas located on the eastern, western or southern facades. A residential use below level 9 is obviously feasible if this is adopted.
- However, it is not necessary to restrict rooms on the northern façade to residential amenities, storage or common spaces on the northern façade.

The SLR report documented noise level for the Western Distributor was 75dB(A)_{Leq(15hr)} during the daytime and 72dB(A)_{eq(9hr)} at night (pdf page 110 of the SLR report). With respect to this:

- This measured noise level was recorded approximately 7-8m from the edge of the nearest lane.
- In the event that the Poulos Building is set back 14m from the nearest lane, the noise level will reduce to approximately 73dB(A)_{Leq(15hr)} (day) and 70dB(A)_{Leq(9hr)} (night).
- If then incorporating a semi-enclosed winter garden *and* an acoustic plenum design (as discussed in sections 5.1.2 and 5.1.4) the noise level would then become approximately:
 - 43dB(A)_{Leq(15hr)} in living areas and
 - 40dB(A)_{eq(9hr)} in sleeping areas.
- This is compliant with the mechanical ventilation trigger in the *Development Near Rail Corridors and Busy Roads* guideline (45dB(A) in bedrooms, 50dB(A) in living rooms). As discussed in sections 3.1 and 3.4 and table 2, a naturally ventilated apartment complying with these noise levels is implicitly considered quiet enough to not warrant supplementary ventilation. This is a reasonable standard to adopt when considering the acoustic amenity of the apartment under naturally ventilated conditions.
- If needed, there would also remain further design options available, such as using cross ventilation principles to reduce the opening areas needed to provide natural ventilation.

5.3 Ethos Urban Concept Plans.

A section drawing of a concept plan for the site is shown below.



With respect to the Ethos Urban concept plans:

- The apartments are double fronted. All apartments have a south facing façade. As discussed above, the south facing façade is significantly less noise impacted, and provision of natural ventilation on the southern façade without excessive noise impact is readily viable. Further, the more orthogonal building footprint (as opposed to the tapered footprint design in the *State Significant Precinct Study*) means the southern façade will be less noise impacted in the Ethos Urban concept design.
- With respect to the northern façade (adjacent to Western Distributor):
 - The setback of the tower is increased to 14m, making it consistent with other residential towers in the precinct where residential use at podium levels is expected to be permitted.
 - Being dual fronted, there will be cross ventilation opportunities. As discussed in the sections above, this creates an opportunity to utilise reduced open window sizes while still meeting suitable airflow requirements (due to pressure differential between one side of the building and the other). This reduced open window size provides acoustic benefit – a smaller window opening means less noise ingress even though the necessary air volume is still achieved.

- The apartments have balconies facing the Western Distributor. As discussed above, a winter garden or semi-enclosed balcony design creates further opportunities to reduce noise impact on north facing apartments.
- There will also remain the opportunity to incorporate acoustic plenums to draw air from balcony areas to internal spaces of apartments.
- These four acoustic design measures have a cumulative benefit – all of the measures can be incorporated to provide benefit to the apartments when operating under naturally ventilated conditions. The acoustic benefit that would be provided will be very high such that the apartment could be used under naturally ventilated conditions while maintaining reasonable acoustic amenity for the occupant.

The Ethos Urban design adopts the design guidance from section 4J that will provide the most acoustic benefit at the subject site and demonstrates that a residential use below level 8 is feasible from an acoustic viewpoint.

6 Closure

Looking at the above, permitting residential land use on Levels 0 to 8 should be permitted from an acoustic viewpoint, as opposed to only from Level 9 and above:

- Façade glass can be selected such that ISEPP compliant noise levels are achieved when apartment windows are closed.
- For Levels 0-8 on the the south façade, these areas are in fact the quietest locations in the building. It is illogical that these spaces be considered unacceptable for residential use from an acoustic viewpoint when it is considered acceptable for Level 9 and above. Similarly, the lower levels on the northern façade (below deck level on the Western Distributor) are quieter than levels about deck level (where residential use is permitted).
- Most critically, there are acoustic design options such that typically adopted acoustic performance requirements under naturally ventilated conditions (Department of Planning, ADG etc) can be achieved on Levels 0-8.

Provided that a suitable acoustic design is adopted as part of Stage 2 DA documentation, there is no reason from an acoustic viewpoint that residential use on Levels 0-8 be prohibited on the site.

APPENDIX A Glossary of terminology



The following is a brief description of the technical terms used to describe noise to assist in understanding the technical issues presented.

Adverse weather	Weather effects that enhance noise (that is, wind and temperature inversions) that occur at a site for a significant period of time (that is, wind occurring more than 30% of the time in any assessment period in any season and/or temperature inversions occurring more than 30% of the nights in winter).
Ambient noise	The all-encompassing noise associated within a given environment at a given time, usually composed of sound from all sources near and far.
Assessment period	The period in a day over which assessments are made.
Assessment point	A point at which noise measurements are taken or estimated. A point at which noise measurements are taken or estimated.
Background noise	Background noise is the term used to describe the underlying level of noise present in the ambient noise, measured in the absence of the noise under investigation, when extraneous noise is removed. It is described as the average of the minimum noise levels measured on a sound level meter and is measured statistically as the A-weighted noise level exceeded for ninety percent of a sample period. This is represented as the L90 noise level (see below).
Decibel [dB]	The units that sound is measured in. The following are examples of the decibel readings of every day sounds: 0dB The faintest sound we can hear 30dB A quiet library or in a quiet location in the country 45dB Typical office space. Ambience in the city at night 60dB CBD mall at lunch time 70dB The sound of a car passing on the street 80dB Loud music played at home 90dB The sound of a truck passing on the street 100dB The sound of a rock band 115dB Limit of sound permitted in industry 120dB Deafening
dB(A)	A-weighted decibels. The A-weighting noise filter simulates the response of the human ear at relatively low levels, where the ear is not as effective in hearing low frequency sounds as it is in hearing high frequency sounds. That is, low frequency sounds of the same dB level are not heard as loud as high frequency sounds. The sound level meter replicates the human response of the ear by using an electronic filter which is called the "A" filter. A sound level measured with this filter switched on is denoted as dB(A). Practically all noise is measured using the A filter.
dB(C)	C-weighted decibels. The C-weighting noise filter simulates the response of the human ear at relatively high levels, where the human ear is nearly equally effective at hearing from mid-low frequency (63Hz) to mid-high frequency (4kHz), but is less effective outside these frequencies.
Frequency	Frequency is synonymous to pitch. Sounds have a pitch which is peculiar to the nature of the sound generator. For example, the sound of a tiny bell has a high pitch and the sound of a bass drum has a low pitch. Frequency or pitch can be measured on a scale in units of Hertz or Hz.
Impulsive noise	Having a high peak of short duration or a sequence of such peaks. A sequence of impulses in rapid succession is termed repetitive impulsive noise.
Intermittent noise	The level suddenly drops to that of the background noise several times during the period of observation. The time during which the noise remains at levels different from that of the ambient is one second or more.
L _{Max}	The maximum sound pressure level measured over a given period.
L _{Min}	The minimum sound pressure level measured over a given period.

L ₁	The sound pressure level that is exceeded for 1% of the time for which the given sound is measured.
L ₁₀	The sound pressure level that is exceeded for 10% of the time for which the given sound is measured.
L ₉₀	The level of noise exceeded for 90% of the time. The bottom 10% of the sample is the L90 noise level expressed in units of dB(A).
L _{eq}	The "equivalent noise level" is the summation of noise events and integrated over a selected period of time.
Reflection	Sound wave changed in direction of propagation due to a solid object obscuring its path.
SEL	Sound Exposure Level (SEL) is the constant sound level which, if maintained for a period of 1 second would have the same acoustic energy as the measured noise event. SEL noise measurements are useful as they can be converted to obtain Leq sound levels over any period of time and can be used for predicting noise at various locations.
Sound	A fluctuation of air pressure which is propagated as a wave through air.
Sound absorption	The ability of a material to absorb sound energy through its conversion into thermal energy.
Sound level meter	An instrument consisting of a microphone, amplifier and indicating device, having a declared performance and designed to measure sound pressure levels.
Sound pressure level	The level of noise, usually expressed in decibels, as measured by a standard sound level meter with a microphone.
Sound power level	Ten times the logarithm to the base 10 of the ratio of the sound power of the source to the reference sound power.
Tonal noise	Containing a prominent frequency and characterised by a definite pitch.

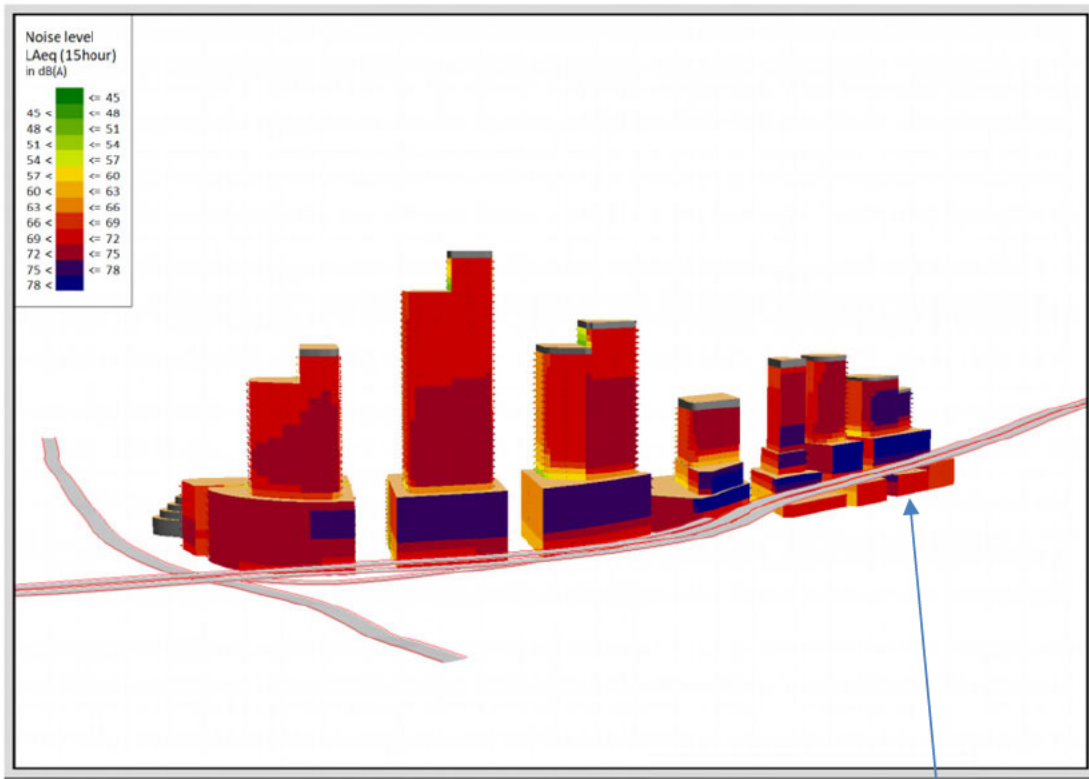
APPENDIX B Extract from SLR Noise and Vibration Assessment, 41/5/2021 – Noise Logging Result Summary (Western Distributor)

L.01 – Ambient Noise Monitoring Results Report 610.17565-R01 Page 1

<p>Noise Monitoring Location: L.02</p> <p>Noise Monitoring Address: 132 Bank Street</p> <p>Logger Device Type: Brüel and Kjær 2250, Logger Serial No: 3005908 Sound Level Meter Device Type: Brüel and Kjær 2250, Sound Level Meter Serial No: 2487418</p> <p>Ambient noise logger deployed at commercial address 132 Bank Street, Pyrmont. Logger located at Goodman, Level 2, in line with the height of the Western Distributor.</p> <p>Attended noise measurements indicate the ambient noise environment at this location is dominated by continuous road traffic noise from Western Distributor with intermittent operational noise emissions from nearby industrial premises at ground level also contributed to the LAeq at this monitoring position.</p> <p>Recorded Noise Levels: (LAmax): 15/02/18: Light-vehicle traffic (Bank Street): 72 - 73 dBA, Heavy-vehicle traffic (Bank Street): 78 dBA, Light-vehicle traffic (Western Distributor): 75 - 82 dBA, Heavy-vehicle traffic (Western Distributor): 81 - 82 dBA, Operational noise: 75 76 dBA</p>	<p style="text-align: center;">Map of Noise Monitoring Location</p> 																																																
<p>Ambient Noise Logging Results – NPfl Defined Time Periods</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Monitoring Period</th> <th colspan="4">Noise Level (dBA)</th> </tr> <tr> <th>RBL</th> <th>LAeq</th> <th>L10</th> <th>L1</th> </tr> </thead> <tbody> <tr> <td>Daytime</td> <td>70</td> <td>75</td> <td>76</td> <td>79</td> </tr> <tr> <td>Evening</td> <td>70</td> <td>74</td> <td>75</td> <td>78</td> </tr> <tr> <td>Night-time</td> <td>61</td> <td>72</td> <td>72</td> <td>76</td> </tr> </tbody> </table> <p>Ambient Noise Logging Results – RNP Defined Time Periods</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Monitoring Period</th> <th colspan="2">Noise Level (dBA)</th> </tr> <tr> <th>LAeq(Period)</th> <th>LAeq(1hour)</th> </tr> </thead> <tbody> <tr> <td>Daytime (7am-10pm)</td> <td>74</td> <td>76</td> </tr> <tr> <td>Night-time (10pm-7am)</td> <td>72</td> <td>76</td> </tr> </tbody> </table> <p>Attended Noise Measurement Results</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Date</th> <th rowspan="2">Start Time</th> <th colspan="3">Measured Noise Level (dBA)</th> </tr> <tr> <th>LA90</th> <th>LAeq</th> <th>LAmax</th> </tr> </thead> <tbody> <tr> <td>15/02/2018</td> <td>7:40am</td> <td>67</td> <td>71</td> <td>82</td> </tr> </tbody> </table>	Monitoring Period	Noise Level (dBA)				RBL	LAeq	L10	L1	Daytime	70	75	76	79	Evening	70	74	75	78	Night-time	61	72	72	76	Monitoring Period	Noise Level (dBA)		LAeq(Period)	LAeq(1hour)	Daytime (7am-10pm)	74	76	Night-time (10pm-7am)	72	76	Date	Start Time	Measured Noise Level (dBA)			LA90	LAeq	LAmax	15/02/2018	7:40am	67	71	82	<p style="text-align: center;">Photo of Noise Monitoring Location</p> 
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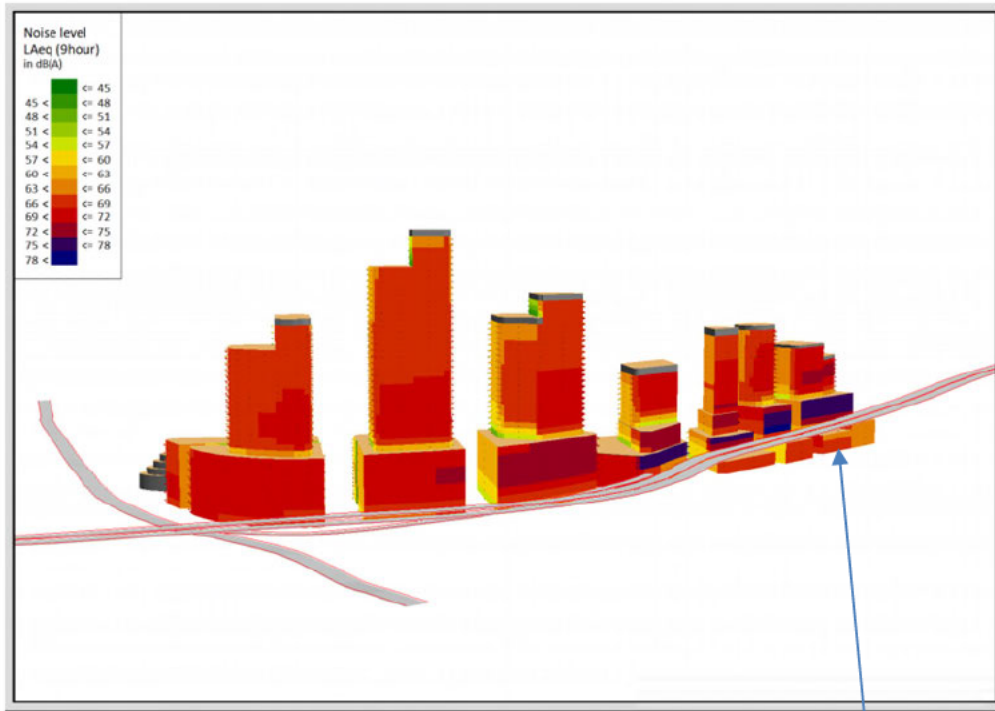
APPENDIX C Extract from SLR Noise and Vibration Assessment, 31/5/2021 (Façade Noise Mapping)

Figure C1 Eastern/North-eastern Façade Road Traffic Façade Noise Map – Daytime (Hymix site redeveloped)



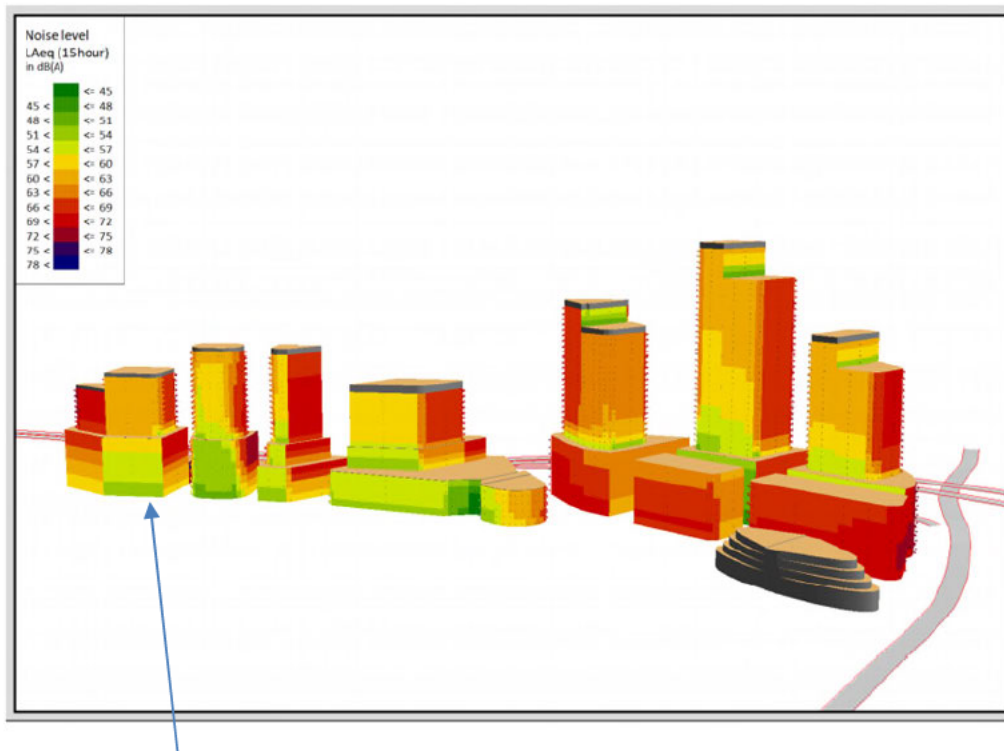
Poulos Site – Viewed from North

Figure C3 Eastern/North-eastern Facade Road Traffic Façade Noise Map – Night-time (Hymix site redeveloped)



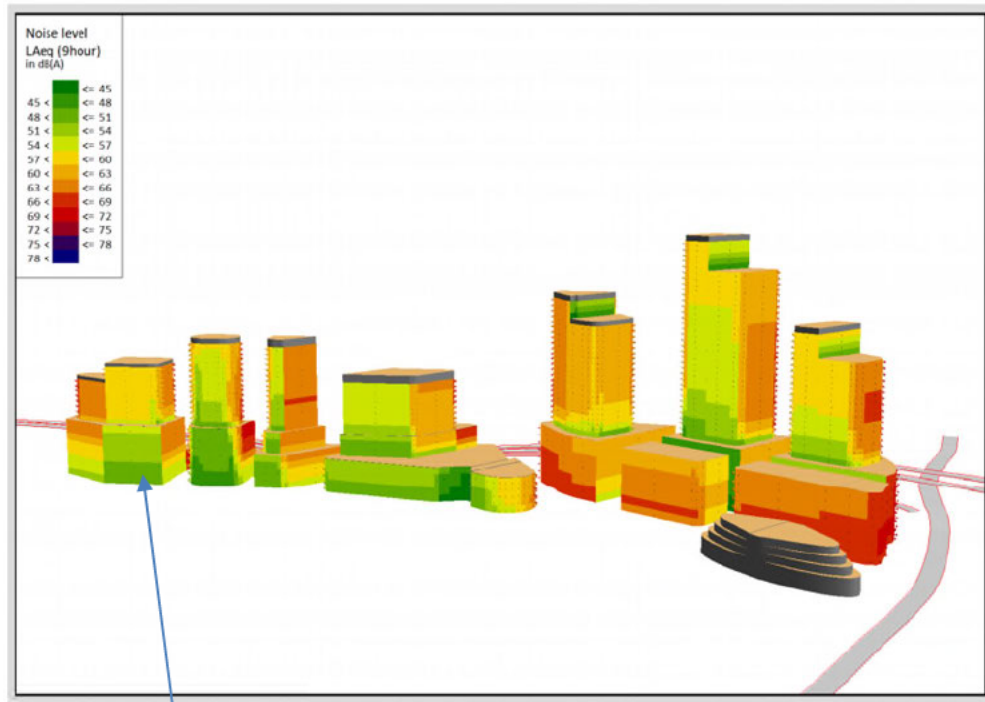
Poulos Site – Viewed from North

Figure C5 Western/South-western Facade Road Traffic Façade Noise Map – Daytime (Hymix site redeveloped)



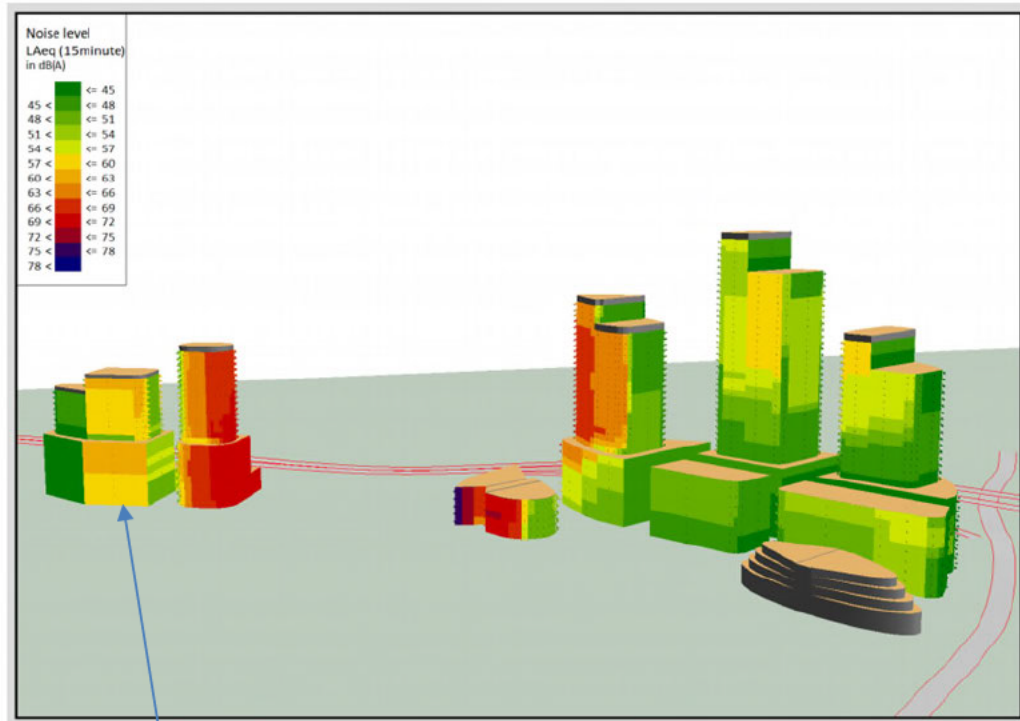
Poulos Site – Viewed from South

Figure C7 Western/South-western Facade Road Traffic Façade Noise Map – Night-time (Hymix site redeveloped)



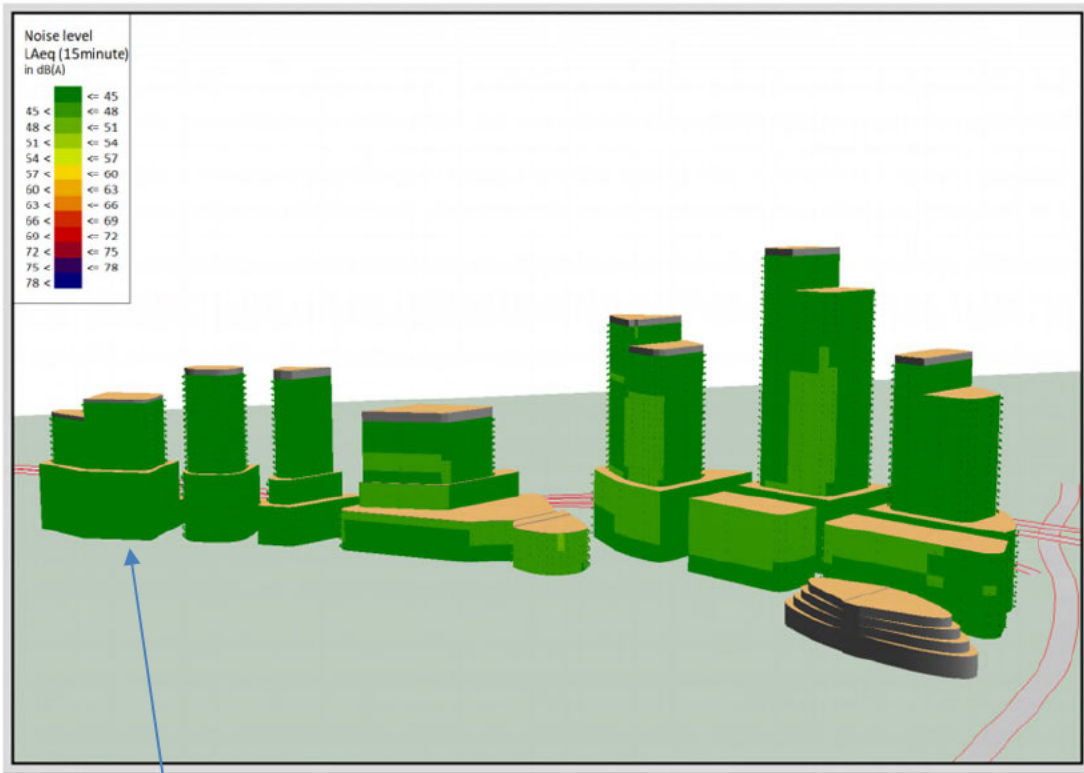
Poulos Site – Viewed from South

Figure C10 Western/South-western Facade Industrial Façade Noise Map – Night-time (Hymix & New Sydney Fish Market)



Poulos Site – Viewed from South

Figure C12 Western/South-western Facade Industrial Façade Noise Map – Night-time (New Sydney Fish Market only)



Poulos Site – Viewed from South

Appendix D. Air Quality Assessment



DATE:	August 19, 2021	RWDI REFERENCE #: 2105734
TO:	Con J. Liaros	Poulos Bros Seafoods
CC:	Tom Goode	Ethos Urban
FROM:	Kevin Peddie	Email: kevin.peddie@rwdi.com
	Michael Pieterse	michael.pieterse@rwdi.com
	Mike Lepage	mike.lepage@rwdi.com
RE:	Poulos Bros Bank Street Site – Bays Market District Building Air Quality	

RWDI has reviewed the report entitled “Blackwattle Bay State Significant Precinct, Attachment 17: Air Quality Assessment”, which is dated June 2021. The report was produced to support development of a new planning framework for Blackwattle Bay.

1 Precinct Plan

The Precinct Plan building layout on which the study was based consists of 11 buildings (BLD01 to BLD07, PL01-Poulos, PL02-Celestine, PL03-Hymix 1 and PL03-Hymix 2), of which 7 are podium-mounted, high-rise towers. The Precinct Plan is stated to include the following mitigation measures for air quality:

- Stepped-back design to minimize urban street canyon effects;
- No sensitive receptors within 20m of major roadways;
- No residential uses on the lower 8 floors of the buildings, except for BLD02, which has residential uses on all floors except the ground floor.

2 Assessment Approach

2.1 Overall Approach

The overall approach to the assessment was consistent with widespread practice in the field of air quality. It consisted of the following components.

- Numerical weather simulation for one representative year.
- Published emissions factors and databases to estimate emissions from significant emission sources.
- Numerical simulation of pollutant dispersal for the significant sources, as a function of meteorological conditions.
- Use of historical air quality monitoring data to represent background air pollutant levels.
- Integration of the monitoring data and the numerical simulation output.

- Comparison of cumulative pollutant levels to relevant standards and/or assessment goals.

2.2 Emission Sources in the Assessment

The significant emission sources included in the simulation were traffic on the Western Distributor, traffic on other local roads with AM peak-hour traffic flow greater than 500 vehicles, and the Hymix concrete batching plant. Emissions from more distant industries, port operations, marine traffic and lesser roads in the Blackwattle Bay area were not included in the simulation and, instead, were assumed to be accounted for in the historical monitoring data. The report assessed the Sydney Fish Market as a source of odours, by a separate assessment. The fish market was not included as a source of air emissions in the numerical simulations. The above approach is reasonable and appropriate.

Due to limitations of the computer programme used to calculate motor vehicle emissions on the modelled sections of roadways, the emissions were based on 2010 fleet characteristics. However, fleet-averaged motor vehicle emissions in Australia have declined since 2010 and are expected to decline further in the future. This approach, therefore, overestimates the roadway emissions that will be experienced by the development once it is completed. To address this issue, the report includes a section dealing with the effect of future vehicle emission reductions. This approach is satisfactory with further modelling during the design phase to understand this difference.

The assessment was carried out for two scenarios: (1) full development of Precinct Plan, with the Hymix facility replaced by mixed-use development; and (2) partial development of the Precinct Plan, with the Hymix facility still in place and operating.

2.3 Weather Simulation

The development of 3-dimensional weather data was accomplished using CSIRO's prognostic weather model, TAPM, whose output was fed into the US EPA's diagnostic weather model, CALMET, and from there to a mesoscale meteorological model known as GRAMM, developed by GRAZ University of Technology, Austria. The latter model generates the 3-dimensional meteorological output in a suitable format for the dispersion model, GRAL. This approach appears to be reasonable and appropriate although does not appear to align with local meteorological weather stations or the wind rose noted in the wind report for the precinct. The effect of this difference should be investigated in further detail and refined to focus on the Poulos Bros Bank Street Site.

2.4 Simulation of Pollutant Dispersal and Selected Air Pollutants

The GRAL dispersion model is understood to have been selected as it has the capability to account for the localised effects of buildings and obstacles, and low wind speed conditions, making it a suitable choice for modelling the urban environment.

The simulation was performed only for oxides of nitrogen (specifically NO₂) and airborne particulate matter. Other air pollutants (VOC species, SO₂) were not simulated as the historical monitoring data indicated a very low likelihood for exceedances of relevant air quality criteria for these pollutants. This approach is sufficient.

2.5 Comments on the Approach

The approach meets or exceeds general practice in the field of air quality. The selection of sources, sensitive receptors, representative meteorological year, air pollutant species and the simulation software all appears to be appropriate to the situation. Two issues were identified that bear further examination:

1. No comparison was made of the simulated weather fields to actual weather observations made at one or more weather stations in the surrounding area. This would give a sense of the suitability of the simulated weather fields and whether, for instance, wind speeds might be generally overestimated or underestimated, etc..
2. In the pictorial results (e.g., in Figures 26, 27, 28, and 29), the results for the lower levels of building BLD02 are out of line with those for adjacent buildings and with the tabular results for BLD02.

3 Results

The results indicate acceptable air quality conditions for sensitive uses at levels above the first 8 floors on facades that have a line of sight to the major roadways, and at all levels on facades that face away from the roadways. The main exception occurs for fine particulate matter (PM_{2.5}), in which case the long-term exposure criteria are exceeded on all facades within the first 8 floors, even those facing away from the roadways. However, it is likely that the degree of the exceedance is small on facades facing away from the freeway.

On the lower levels of facades with a line of sight to the highway, the air quality conditions improve with increasing setback from the freeway, with the results being more favourable on the freeway-facing facades of BLD02 through BLD04, which have a larger setback from the highway than PLO01 through PLO03.

Overall, the results appear to be credible. They indicate that having commercial and retail uses in the lower 8 floors is an appropriate mitigation measure for facades with a line of sight to the major roadways. However, residential uses on lower floors appear to be generally appropriate at sides of the buildings that face away from the roadways and may also be appropriate if suitable setbacks or other mitigation measures are achieved on sides facing the major roadways. This could be confirmed during detailed assessments that the air quality report recommends be undertaken on final building configurations.

A preliminary indicative plan and sectional view (Image 1) have been reviewed of a design being developed for the Poulos Brothers site on Bank Street. The preliminary

design consists of residential units starting at the second level of the tower, which is below the level of the freeway deck. On the other hand, the air quality study of the Precinct Plan was based on 8 levels of commercial, with the lowest residential levels being several levels above the level freeway deck. In addition, the lower residential units in the preliminary plan appear to be separated from the freeway by less than 20m, which means they are within the area where the NSW interim guideline on Development Near Rail Corridors and Busy Roads recommends air quality be a design consideration.

This does not necessarily mean that residential uses are not feasible below the 9th floor level. However, for these residential units, it would be desirable to avoid balconies and operable windows on the freeway side of the apartments. Fresh air for ventilation of the apartments should be provided from openings at the water side or, if a central air system is to be used for ventilation, it could be provided from louvres on a mechanical floor located higher up on the building. As noted, the air quality levels can be confirmed during a detailed assessment for the final building configuration which could also capture the comments noted in Section 2.5.

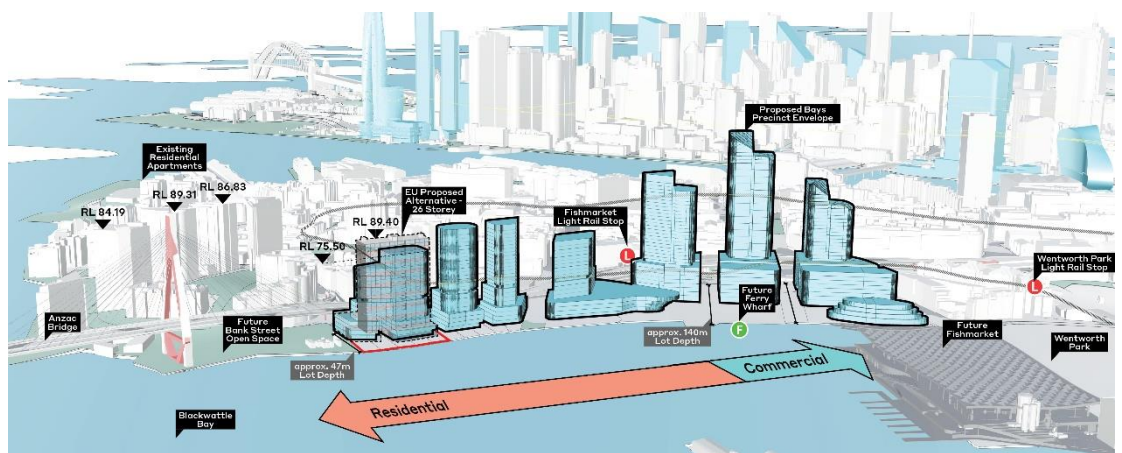


Image 1: Blackwattle Bay Development Precinct

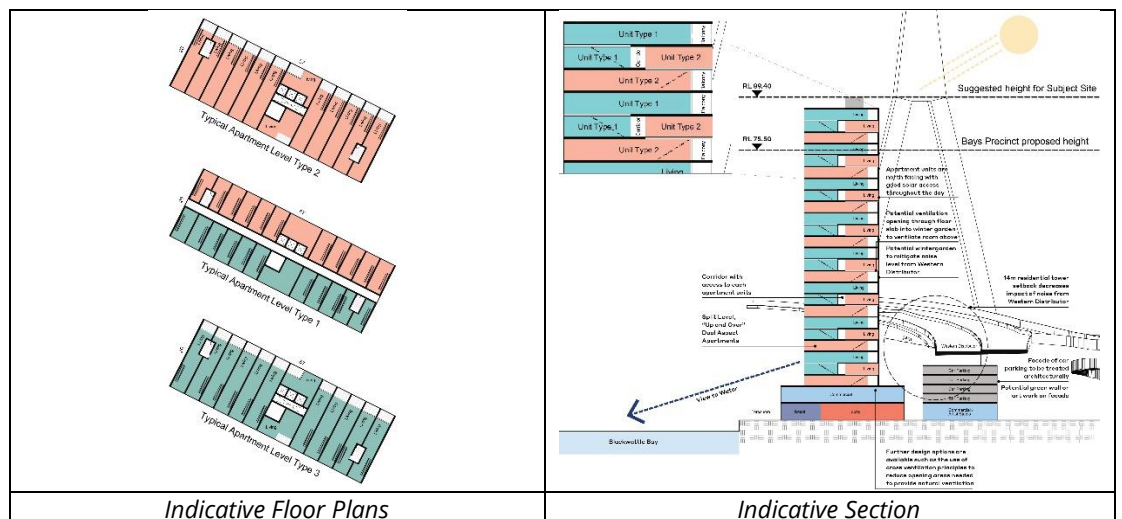


Image 2: Indicative Floor Plans and Section of the Poulos Bros Bank Street Site

182766

[redacted]

Pymont

This proposal should not proceed before the Pymont Peninsula Place Strategy is finalised.

The proposal to develop Blackwattle Bay has many attractive features.

Sydney Harbour is one of the finest harbours in the world, and it is the government's intention to create a world-class fish market precinct. This will not be achieved by this Precinct Plan. The overall impression created by the plan is that the government needs to maximise its income by enabling developers to build massive towers on the foreshore and sell this property to the highest bidder. The towers will create a wall of buildings blocking the surrounding area, overshadow much of the foreshore and surrounding streets, and produce wind tunnels on the foreshore walk and between the buildings.

The proposals to amend existing planning legislation will enable these towers to be built without further community consultation, and deny affected community members any role in future plans for the precinct.

**A collective local voice on Blackwattle Bay State Significant Precinct Study
Council of Ultimo/Pymont Associations (CUPA)**

'First Nations peoples globally are of country we are not just from country. We are the traditional owners of the air, water and sky we are a people that come from many nations and clans. We are the custodians and stewards of the lands.'

Indigenous history, heritage and culture and tradition must be honoured

The plan calls for a significant representation of indigenous history, heritage, culture and tradition. This will only be achieved by including housing for Aboriginal, Torres Strait and their kin Australian South Sea Islanders (ASSI). Koori history requires respectful engagement with the local community, and contribute to the proposed activities, for example in the gathering circle. We also need a cultural/learning centre in a proper place for students and the community to show where they belong in reinforcing the cultural heritage and shared history of the precinct. To not honour traditional owners of the lands of which this construction is to take place on is to add insult to injury for an already displaced peoples. There must be a permanent Indigenous presence throughout the development of the precinct. Social and economic opportunities are paramount in providing equal access for existing and new businesses to connection with people who can afford luxury apartments in high-rise buildings on the harbour foreshore. To deny this level of engagement and opportunity is to deliberately reinforce existing marginalisation these communities face within the CBD.

Tribal Warrior has been a central part of the seafaring community for over two decades in building Indigenous and broader community connection through Aboriginal culture, tradition and family. To be meaningfully consulted and included as part of the Blackwattle Bay Precinct in establishing the first Indigenous Marina operators on the waterside for a project of this calibre would bring a significant community culture and genuine history as part of the shared space for existing and new residents.

We need to be at the table throughout all negotiations and request that the points outlined in this document are respectfully negotiated.

All parties involved are reminded that Indigenous community sustainability and local knowledge with lived experience we draw on over 60,000 years of caring for country. Our peoples and strong cultures and traditions have survived over 200 years of displacement and desecration as we rebuild our communities in working together with harmony and respected for a shared space.

History to be reflected:

1. Prior occupation of Indigenous Australians at the site. It had a key source of fresh water and used for fishing, boating, ceremony in the presettlement years, prior to industrialisation of the area. This history could be reflected in some way in the redevelopment plan that partners with local community representative organisation from the area.

2. The industrialisation era brought the establishment of the CSR a very prosperous sugar refinery that imported brown sugar from across NSW and Queensland refineries and then distributed the bagged white sugar (via horse and cart initially, then trucks to other parts of Sydney for export). The sugar from our states was sourced from the labours of 62,500

indentured South Sea Islander men from Pacific Islands who were treated as slaves across agriculture, pastoral, fishing and railway industries. These people were denied citizenship after Australia Federated on 1 January 1901. The sugar arrived in boats manned by South Pacific Islanders. This history could be reflected in some way in the redevelopment plans again working in with local Indigenous, Historical Groups, Maritime and Australian Museums and as well as descendants of this trade the Australian South Sea Islander organisations and collective community groups.

This proposal should not proceed before the Pyrmont Peninsula Place Strategy is finalised.

The proposal to develop Blackwattle Bay has many attractive features.

Sydney Harbour is one of the finest harbours in the world, and it is the government's intention to create a world-class fish market precinct. **This will not be achieved by this Precinct Plan.** The overall impression created by the plan is that the government needs to maximise its income by enabling developers to build massive towers on the foreshore and sell this property to the highest bidder. The towers will create a wall of buildings blocking the surrounding area, overshadow much of the foreshore and surrounding streets, and produce wind tunnels on the foreshore walk and between the buildings.

The proposals to amend existing planning legislation will enable these towers to be built without further community consultation, and deny affected community members any role in future plans for the precinct.

Blackwattle Bay needs a master plan

Why is there no Master Plan for the area - including future use of the Glebe Island Bridge for pedestrians and active transport? Glebe Island Bridge is a critical asset it needs to be brought back to life for cycling and pedestrians. The Pyrmont Peninsula Place Strategy assured us of a planned strategy for the whole area. Now we are asked to accept piecemeal planning without considering increased traffic and parking, no indication of how better public transport will be introduced, and no reference to public infrastructure like educational, medical and aged care facilities, a men's shed, a women's shelter.

Blackwattle Bay should not be an extension of the CBD

The assumption that Blackwattle Bay should be an extension of the CBD is unreasonable and inappropriate. Pyrmont and Ultimo are primarily residential, and already among the most densely populated suburbs in Australia; and Blackwattle Bay forms a bridge to Glebe. All have a long history as residential suburbs: changing the planning regulations to enable the bay to accommodate enormous commercial and residential towers is much more about allowing developers to exploit the harbour foreshore than any public benefit. Planners have developed Darling Harbour as a wall between the city and these suburbs.

Local residents should not have to pay for a Sydney/NSW-wide facility

The huge towers are presumably to help pay for the new fish market. This development will benefit the whole of Sydney, support the entire seafood industry of New South Wales, and provide great opportunities for interstate and international tourism, boosting the state's economy. Pyrmont residents should not suffer loss of views of the harbour, overshadowing and wind tunnels between towers as they walk around the harbour foreshore. Benefits for the State's economy should be paid for by the whole State.

Developer contributions are needed for vital local infrastructure

The proposal that developer contributions go into the state coffers will jeopardise community benefit. Increased number of residents and workers will require more social infrastructure,

including community facilities, schools and medical facilities. Developer contributions should not be directed to other areas, but will be needed by our community, and expenditure of these funds must be transparent and accountable.

The community facilities described in the plan are completely unfunded.

Over-tall towers will form a wall between Pyrmont/Ultimo and the harbour and between Pyrmont and Glebe

A principle of the Pyrmont Peninsula Place Strategy is that new buildings should respect the character of the surrounding area. At most towers should be no higher than the tallest buildings in Jacksons Landing. They will also create a wall between Glebe and Pyrmont. View sharing is an equitable principle in residential areas. These towers will prevent sharing views of Blackwattle Bay from surrounding areas.

Exposure to air and noise pollution

The proposal recognises that the proximity to a busy road network and the Anzac Bridge will involve extreme vibration, noise and air pollution. Windows will need to be closed to manage noise, ruling out natural ventilation.

Overshadowing and wind in parks, walkways and surrounding area

Sunlight in new parks is less than the City of Sydney's requirements. Few, if any, streets will have the sunlight required for tree growth. Overshadowing of existing dwellings south of Pyrmont Bridge Road is not adequately addressed. Excessive wind between tall towers will make walkways unsafe and seating uncomfortable. Wind and overshadowing throughout the precinct will inhibit tree growth. Trees are vital for purifying air, cooling the ambient temperature, and contributing to people's mental health. The promenade will be in shade from 6.30-10am hardly a "world-class" harbour foreshore promenade!

2,800 more residents should not be added to an already dense population

Excessive height and girth of residential towers will bring too many new residents. Traffic on surrounding roads will be increased in a network leading to the Anzac Bridge, which traffic engineers say is already at capacity.

Residents are entitled to see Blackwattle Bay

Blackwattle Bay is a tranquil and beautiful cove, with a long indigenous and settler history. Plans should enable as many residents as possible to enjoy their proximity to Sydney Harbour. The proposed towers will steal this outlook from most of the surrounding area, for the benefit of new residents who can afford to buy into these towers. Not only will they block views, but they will also block sunlight for much of the day for large stretches of nearby land, including the proposed foreshore walkway and community open space, and create wind tunnels between them.

Traffic will increase to unmanageable levels

Traffic in this road network is already very congested. There are no proposals to increase public transport. The Pyrmont Metro station is years away and at a distance; no more light rail stations are being considered; there are no current plans for a ferry service; and the plan for parking is to have no more than the existing number of spaces. Most visitors to the fish market come to buy seafood. Very few will want to carry their seafood esky home on the light rail, the metro, the ferry or the bus, so the surrounding streets will have to accommodate increased parking, creating further congestion and denying parking for residents.

Private landowners will benefit disproportionately

Once the land along Bank Street is rezoned, Poulos Bros Seafoods Pty Limited, Celestino/Baiada Poultry Pty Ltd. and Hanson Australia Holdings Proprietary Limited will benefit hugely from sale of their land. The higher the new buildings on this stretch of land, the more disadvantaged the current residents. How does this fit the approach advocated in the plan: "... development potential to be distributed fairly & impartially"?

More open space and sports facilities are needed

Pymont has several parks, but no full-size courts for any team sport. Apart from building fitness, team sports build a sense of belonging, working together, adherence to rules. Maybanke Recreation Centre must be developed into a purpose-built sport and active recreation centre, which will serve the community and the wider Inner West. Developer contributions from Blackwattle Bay should be dedicated to this much needed facility. 94% of housing in Pymont is apartments, needing much more outdoor space for children than families who live in houses with backyards. We cannot just rely on Wentworth Park which is shared by Pymont, Ultimo and Glebe. As soon as the current greyhound lease expires, it should be devoted to local sporting activities, with the possibility of including a high school, and perhaps extending the Ultimo Primary School when this is needed.

What is the health benefit to our community?

This development should provide an excellent net health benefit. The proposal promises a world class, 5 star precinct to benefit residents, workers and visitors. But overshadowing and wind will prevent it reaching its potential for those wanting to walk, run, cycle, sit or relax, whether for physical or mental health.

Some urban heat and mental health impacts can be mitigated by biodiversity - trees make it cool to walk. With proper planning we could have majestic tree canopies with birds beside a world class Australian city foreshore walkway.

Proposals to amend planning legislation deny democratic planning

The state government undertook to return planning powers to the people! What is proposed is diametrically opposed. Current legislation in the Sydney Regional Environmental Plan:

SREPP Section 25 Foreshore and waterways scenic quality

- (a) The scale, form, design and siting of any building should be based on an analysis of:
 - (i) The land on which it is to be erected, and
 - (ii) The adjoining land, and
 - (iii) The likely future character of the locality.
- (b) Development should maintain, protect and enhance the unique visual qualities of Sydney Harbour and its islands, foreshores and tributaries.
- (c) The cumulative impact of water-based development should not detract from the character and adjoining foreshores.

SREPP Section 26 Maintenance, protection and enhancement of views

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

The Department's aim is to repeal existing legislation so as to permit creation of excessively large buildings along the foreshore of Blackwattle Bay. This will contravene much of the established requirements for planning in Sydney, and especially around Sydney Harbour.

It also proposes to limit the approval of major development proposals (>\$10 million) to the control of a single Planning Secretary. This may speed up decisions about significant developments, but opens the door for influence by vested interests, and denies citizens the right to participate in any consultation and decision-making.

Foreshore promenade must be 30m wide

Completion of the foreshore promenade around the harbour - one of the most important tourist facilities in Sydney. It must be 30m wide all the way. Given the anticipated number of visitors and the need for residents in surrounding suburbs for more open space - pedestrians, cyclists, dog-walkers, families with prams, kids on bikes and scooters squeezing the walkway back to 10m at some stages will create serious congestion and not allow for physical distancing at times like the present pandemic. The lack of separated cycleways and walkways is already a problem along the Glebe foreshore. Some Glebe residents are currently avoiding the Jubilee Park foreshore walk out of concern for overcrowding.

Consider and respect our history:

In 1831 under Governor Darling, the Surveyor-General of the colony of NSW Thomas Mitchell introduced Clause 14 to the NSW Land Regulations [Syd Gaz 4 Aug 1831]: "No land within one hundred feet of the high water mark on the sea coast, harbours, bays, or inlets, is to be considered open to purchase, unless for the purposes of commerce or navigation."

Genuine commitment to public and affordable housing

Key workers need to be close to the city. The plan proposes 5% of the housing for nurses, teachers, community support workers, police, ambulance and emergency officers, delivery personnel and cleaners. This is 78 apartments and will not accommodate all the key workers who are needed. Further the plan suggests that funds could be diverted to other places, effectively removing the government's commitment to this essential housing. Many other jurisdictions have much greater commitments to housing key workers eg the City of Sydney advocates 25% of housing to be affordable on government-owned land. We support the City West Housing model whereby tenancies enable people of different income levels to stay in the same place.

The provision to allow monetary contributions in lieu of direct investment in affordable housing offers no guarantee of affordable housing in Blackwattle Bay.

More public open space needed

The amount of public open space proposed is only 30%, and much of it is in shade under the approaches to the Anzac Bridge. Planning for Barangaroo allocated 50% open space. Pyrmont is 94% apartments. Ultimo is getting more high-rise. School-age children attend a high-rise primary school. Wentworth Park is shared between 3 suburbs. There is a much greater need for active playing space. Kids and young adults need space to kick a ball, run around vital for their mental and physical health.

Community consultation

The documentation includes this statement:

The principles for a future Blackwattle Bay were formed through extensive community consultation in August 2017. These were further developed in 2019, together with a vision for the precinct. These have guided the development of the Precinct Plan and will continue to guide future development proposals within the Study Area.

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

2. Minimise additional shadowing to Wentworth Park and Glebe Foreshore (in mid-winter) and create new places with comfortable conditions for people to enjoy.
3. Pursue leading edge sustainability outcomes including climate change resilience, improved water quality and restoration of natural ecosystems.
4. Prioritise movement by walking, cycling and public transport.
5. Balance diverse traffic movement and parking needs for all users.
6. Link the Blackwattle Bay precinct to the City, Glebe Island and White Bay and other surrounding communities and attractors.
7. Mandate Design Excellence in the public and private domain.
8. Integrate housing, employment and mixed uses to create a vibrant, walkable, mixed use precinct on the city's edge.
9. Maintain and enhance water uses and activities.
10. Allow for co-existence and evolution of land uses over time.
11. A place for everyone that is inviting, unique in character and socially inclusive.
12. Expand the range of recreational, community and cultural facilities.
13. Plan for the future community's education, health, social and cultural needs.
14. Deliver development that is economically, socially, culturally and environmentally viable.
15. Embed and interpret the morphology, heritage and culture of the site to create an authentic and site responsive place.
16. Foster social and cultural understanding and respect to heal and grow relationships.

As we have shown, most of these principles have been abandoned. We urge the government to go back to the drawing board, and create a master plan for Blackwattle Bay that respects the above principles, and proposes a genuine world class precinct that will accommodate the needs of our community and build a Blackwattle Bay precinct of which Sydney and New South Wales can be proud.

Local communities that have contributed to this discussion paper:

- Tribal Warrior E: [REDACTED]
- Scarred Tree Indigenous Ministries
- Bowman Street Action Group
- Pyrmont History Group
- Australian South Sea Islanders (Port Jackson) E: [REDACTED]

182971

[redacted]

Pymont

Concerns relating to the current plans proposed, Blackwattle Bay redevelopment.

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

As the resident/ owner of Bayview apartments [REDACTED] we had received notification of the development plans submitted for Blackwattle Bay redevelopment along with the technical documents as plans on display. The current plans call for significant mixed-use development along Bank street with towers close to 18 stories and adjacent buildings even higher.

As the resident of this building, we strongly believe that this development creates the following concerns and negatively impact us:

a) Character: While it is mentioned the current plans have been developed in consideration of the character of the neighbourhood the following attributes of the development negate that:

- Setbacks and building height: The proposed buildings reaching higher than 18 stories it does not consider the current building heights along Bank Street which is a major setback.
- Location and size of private open space: Consultations in the past advised the Department of Planning to increase the number of open spaces considering Pyrmont to be one of the highest density suburbs. The current plans overlook the recommendation. The large mixed-use towers will occupy what was intended to be allocated open space with only small land allocated for open space, thus compounding the current issue of the suburb density.

b) Overshadowing: The developments along the intersection of Quarry Master Drive and Bank Street will significantly overshadow the [REDACTED]. The positioning of new towers in the current plans does not provide an accurate assessment.

c) Overlooking/loss of privacy: The residential & commercial use of the tower along Quarry Master Drive and Bank Street will create overlooking and loss of privacy and have a negative impact on us and the residents. Bayview towers were created with many apartments with balcony doors and windows facing the bay and Bank Street. The loss of privacy will negatively impact the living often resulting in residents having to down their blinds or installing other mechanisms.

d) Visual bulk of building: The development of the intersection of Quarry Master Drive and Bank Street will result in large, bulky buildings impacting the outlook of neighbours and dominate private open space areas such as apartment balconies facing the bay. The proposed developments would discourage many residents to enjoy the outdoors and prevent them from enjoying access to sunlight as they do as a result of overshadowing.

e) Overdevelopment: The plans suggest the Department's view is to go for a balanced outlook; however, this is not accurate. The addition of hundreds of apartments and office space will be considered as overdevelopment of an already congested area. As highlighted above the current fish market and private land should have been opened for the residents to have better access to open land.

f) Residential noise and vibration: The current assessments advise the buildings will be planned in accordance with the codes to ensure the occupants of new towers, are not impacted by noise with correct distance & height. However, the current plan fails to advise how the new construction will have an adverse impact on residents of [REDACTED] along Bank Street. With the increased development the noise pollution & vibration must be understood by doing the following:

a) assessment done for [REDACTED] now to ensure the current noise pollution as per the standards incorporated into the development

- b) ensure take the above assessment into account when factoring the building heights of the proposed construction
- c) provide noise & vibration reduction for current & future residents by putting large glass panels along the Anzac bridge to deflect the noise
- d) provide appropriate noise reduction for [REDACTED] through Noise Abatement Programs such as Double-Glazing Door & Windows and Noise reduction curtains

In consideration of the above concerns, I and residents of [REDACTED] believe the heights of the buildings must be reduced significantly to not have an adverse impact. Furthermore, great effort needs to be put into understanding how the proposed plans negatively impact an already noisy and densely populated Pymont and in the particular intersection of Quarry Master Drive and Bank Street.

Looking forward to a favourable and considerate response.

Sincerely,

[REDACTED]

182976

[redacted]

Pymont

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Looking forward to a favourable and considerate response.

Sincerely,

[REDACTED]

183201

[redacted]

Glebe

To Whom This May Concern,

The renewal of the Sydney Fish Markets is a welcomed change to the outdated current facilities; bringing new life into one of Sydney's most iconic industries while also providing local employment opportunities to the area. The webinars were extremely informative and provided great insight into the repurposing of the current Fish Markets site and demonstrating the consideration for design elements is well thought out.

However, what seems completely out of place in comparison to the well-thought-out plan, is the unnecessarily large apartment buildings planned for the former site. The harbour foreshore should be prioritised for public space and greenery, embracing the surrounds. The scale of these proposed apartment buildings is benchmarked with Darling Harbor Sofitel and Barangaroo style buildings – both examples dissimilar to the Sydney Fish Markets area, being situated in areas that are located within the CBD and heights in-line with surrounding like-buildings.

The proposed apartment buildings at the current Fish Markets site have not been designed with the local community's best interest, consuming the visible CBD skyline, casting a shadow over majority of the public spaces while also putting unrealistic pressure on already densely populated roads and transportation infrastructure.

The area has enormous potential, and while majority of the design has a balanced approach to employment, public space and natural preservation, design improvements are needed to bring all elements in line to a more sustainable and synchronised outcome. An approach that can accommodate the increased foot-traffic that new markets will inevitably bring, while also acting in the best interest of the surrounding residents. A much more in-lined approach would be to preserve the already limited foreshore for public space and parklands, maximising the waterfront and skyline access for this international tourist destination. The proposed skyscrapers works against this, and does not act in the best interest of the new development plan.

Thankyou,

Blackwattle Bay State Significant Precinct – Personal Submission

Submitter: [REDACTED]

Location: Resident of Glebe, 2037

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